



ENVIRONMENT



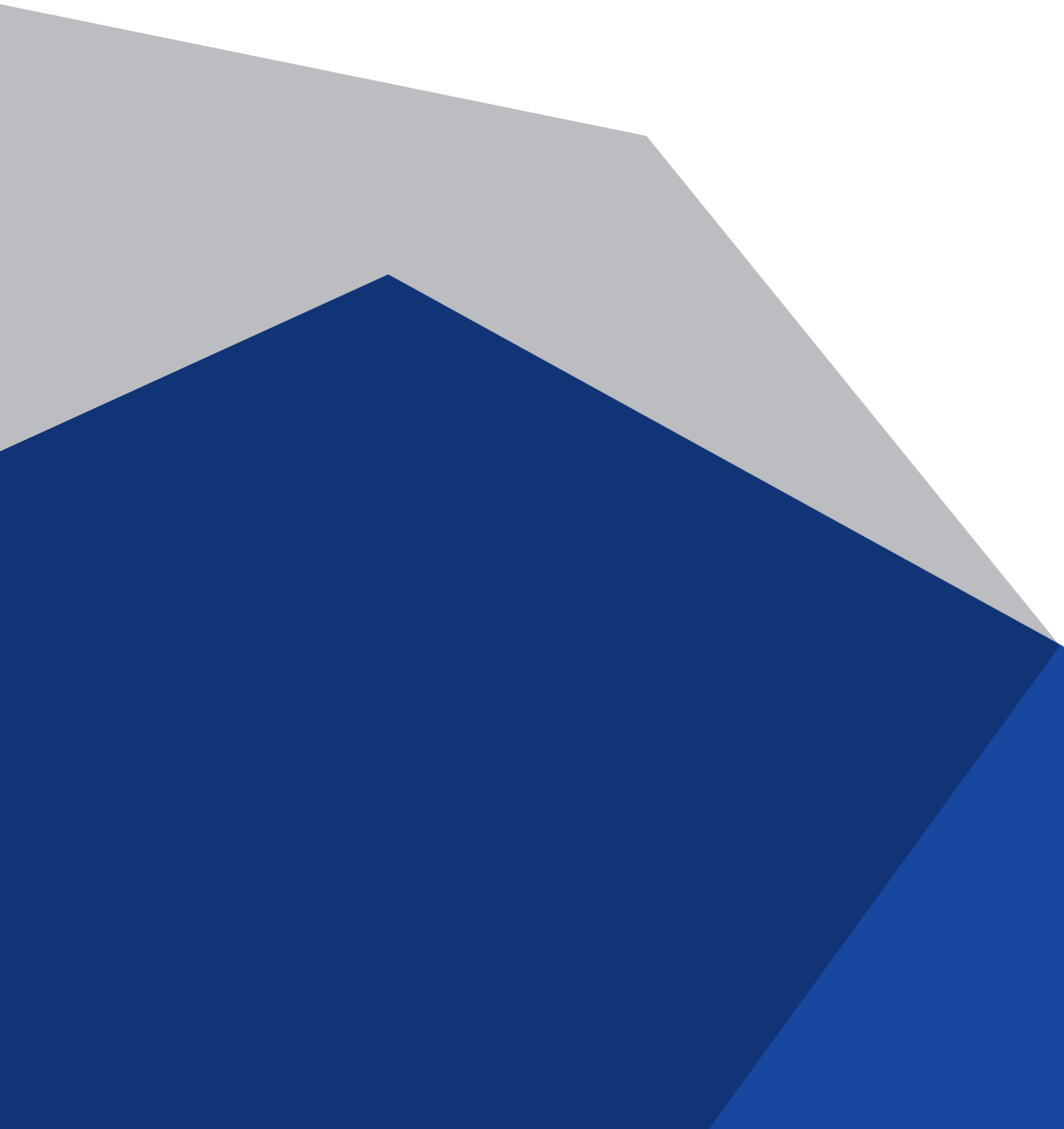
DEVELOPMENT



SOCIETY

CORPORATE  
SOCIAL  
RESPONSIBILITY  
REPORT

**2015**



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at a glance

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**ROAD SAFETY**

Road Safety Management System certified in accordance with ISO 39001: 2012

**6** Variable Message Signs (VMS)

**62** **CAMERAS**  
24-hour surveillance

**1075** 4-digit emergency telephone number

24-hour Motorway Traffic Management Center

**24h** 24-hour road safety patrols

**SOS** Emergency (SOS) phones located along the motorway

**EN** Pilot installation of Weight Measurement in Motion EN

**6.753** INVESTED IN AWARENESS CAMPAIGNS

Average response time per incident type **9,5'**

**5.078,54** **HOURS** ROAD MAINTENANCE

**1.596** **HOURS** INVESTED IN ROAD INFRASTRUCTURE INSPECTIONS

**CARING FOR THE ENVIRONMENT**

Environmental Management System certified in accordance with ISO 14001:2004

**€839.377,6** invested in Environmental protection and Health & Safety

Ongoing action to protect biodiversity

**QUALITY IN SERVICES**

Quality Management System certified in accordance with ISO 9001:2008

**1** DEDICATED CUSTOMER SERVICE AND CUSTOMER CARE CALL CENTER

**4** MOTORIST SERVICE STATIONS (M.S.S)

OPINION SURVEYS

CUSTOMER CALL SERVICE

EMAIL CUSTOMER SERVICE

INFORMATION LEAFLETS

3 METHODS OF TOLL PAYMENT

**HUMAN RESOURCES**

**300** EMPLOYEES

**57%** WOMEN **44%** YOUNG PEOPLE 26-35 YEARS OLD

Health and Safety Management System certified in accordance with OHSAS 18001: 2007

**75%** Very high levels of employee engagement

Adoption of the international methodology of Development Centres

**48,3%** of employees attended at least 1 training

**90%** of employees received performance appraisals

**2.962,5** training hours

**1.059,5** training hours on Health & Safety

**COOPERATION WITH LOCAL COMMUNITIES AND SOCIAL CONTRIBUTION**

**51%** of our suppliers are local

**INVESTMENT 528.311,28** Fast Pass discount program

Welfare and Social Solidarity Actions: **€35.881**

Initiatives to support education: **€15.680**

In Kind Donations: Free pass to people with disabilities

**INVESTMENT € 202.905,41**

Annual contribution to social development "Social Product" **€302.003.720,00**

**BUSINESS**

**0** INCIDENTS OF > non compliance with regulations on health and safety of users

> non compliance with regulations on signage on motorways

> non compliance with principles of responsible communication - or corruption

Member of the non-profit organisation "HELLASTRON" for road transport

## Message from the CEO



The document that you hold in your hands constitutes the 2nd Corporate Social Responsibility Report of Nea Odos.

True to our commitment for complete transparency we present to you for the second consequent year, the priorities, the practices and the outcomes of our business activities. The current report constitutes the continuation of our first effort in Sustainability reporting and aims to clearly showcase the company's strategy for issues related to Corporate Responsibility.

The first Report acted as our promise that we will continue to fashion, implement and upgrade our social and environmental endeavors. The second Report proves we can keep our commitments. We demonstrate in practice the stability of our decisions and our ability to create relationships of value and of mutual benefit.

We act fairly towards our stakeholders. We take care of our employees, we support our partners and endorse the local communities through those our highways are traversing. We acknowledge those who actively contribute to the development of our company and support the vision to become exemplar for our segment.

The entire business community came across immense structural issues in 2015 that have dazed its stability and ability to create value consistently. We continue to operate based on the values that support our vision, based on substantial value capital that our employees create day by day. We continue to upgrade the national road transport infrastructure and contribute to local, regional and national development.

It became clear from our first Report, that the awareness of the seriousness and criticality of road safety issue concerns everyone. But it is our responsibility to overcome the narrow limits of our business activities and with our expertise to care for future generations.

There is no doubt that the future is promising for companies that have built solid foundations, have a clear vision, are focused on specific objectives and evaluate their results.

I am optimistic, that you fellow travelers, will support us in our mission for safe road transport.

Thank you

Stelios Pentheroudakis

## In 2015 we continued to:

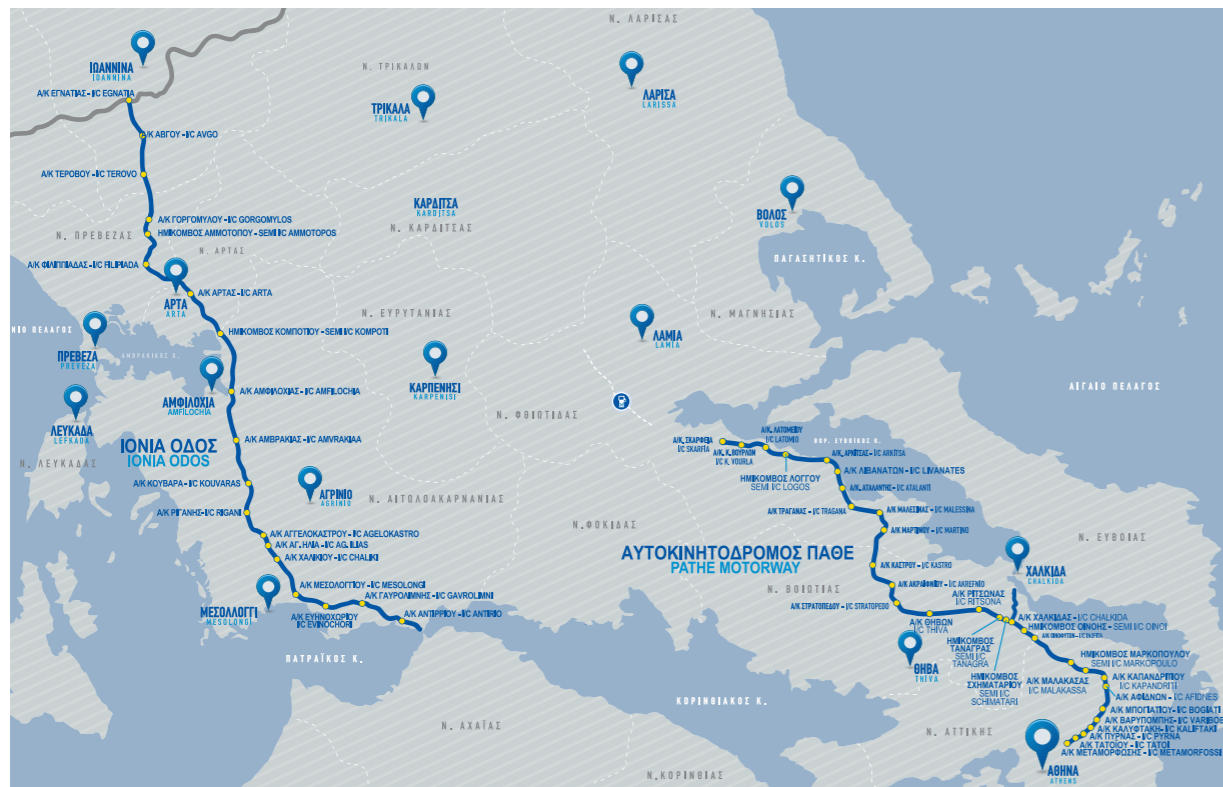
- **Implement**  
scientific interventions  
in dangerous places
- **Offer**  
traffic monitoring  
services and incident  
and accident management
- **Contribute**  
to the modernization  
of road safety's  
regulations on
- **Invest**  
in equipment and new  
technology services for  
information, warning  
and guidance
- **Apply**  
up to date road  
infrastructure  
management methods
- **Focus**  
our actions on  
young people

# Who we are



Nea Odos SA Concession (Nea Odos) is the company that constructs, maintains, operates, and manages modern motorways of European standards. It contributes to the development of the national economy and to the enhancement of life quality of the broader society as a whole, while it ensures the protection of the environment.

Nea Odos was established in 2008 and it has undertaken the concession project of "Ionia Odos" of total budget €1.1 bn.



## An inspired project

With a total length of approximately 380 km, Ionia Odos, as a concession project includes:

- > Ionia Odos motorway of a length of 196 km from Antirrio to Ioannina (Egnatia Odos I/C).
- > Part of the PATHE motorway, of a length of 173 km, from the Metamorfosi I/C to Skarfia, after Kamena Vourla;
- > PATHE connecting branch Schimatari - Chalkida, of a length of 11 km.

Nea Odos is the Concession Company which has undertaken the study, design, construction, operation, exploitation and maintenance of the "Ionia Odos" Concession Project. This long-term project, with a total length of 380 km, includes the following main sections:

**A) "Ionia Odos" motorway of an approximate length of 196 km. from Antirrio to Ioannina (Egnatia Odos I/C). This motorway is of paramount importance, both at social and development level, since:**

- It connects Western Greece upgrading urban and rural centers such as Ioannina, Arta and Agrinio.
- It adequately serves and connects the ports of Patra, Astakos, and Igoumenitsa.
- It contributes to the overall development of the area by improving the access to major tourist and archaeological sites since, upon completing its construction, the trip from Antirrio to Ioannina will take 1 hour and 40 minutes instead of 3 hours and 30 minutes that it takes today.
- This is a project that passes through two regions and four counties, thus meeting a long-existing demand and giving a new impetus for growth.

Technical features of the project include among others:



**B) PATHE motorway of an approximate length of 172,5 km** from Metamorfosi I/C (area of Attiki Odos) to Skarfia, Prefecture of Fthiotida, after Kamena Vourla. In order to make PATHE a modern and safe motorway, significant changes are scheduled and implemented. We aim at transforming the 172,5 km part from Metamorfosi to Skarfia to a reference model according to both Greek and international standards.

Works already in progress, include road widening works, guardrail replacement, interchange reconstruction, upgrading of existing parking spaces and creation of new ones, upgrading of horizontal and vertical signage, etc.

PATHE section passes through two regions and three counties and some of its technical features include:



**C) PATHE connecting branch Schimatari – Chalkida of a total length of 11 km** under construction.

**Nea Odos  
is responsible  
directly or  
through its  
partners for:**

- ▶ **The study:**  
The preparation of all the necessary studies (environmental, road-construction, geotechnical etc.)
- ▶ **The design:**  
Of all new sections
- ▶ **The construction:**  
Of all new sections
- ▶ **The operation:**  
Control and traffic monitoring, emergency event management, routine tasks (i.e. road cleaning)
- ▶ **The maintenance:**  
Of the premises, motorway, relevant equipment, vehicles
- ▶ **The management:**  
Collection of tolls and management of motorway service stations (M.S.A)

**Our mission**

We offer the highest standards of safety in combination with top quality services. We pursue excellence in the operation and maintenance of our motorways. We embrace the imperative need for protecting the environment, fostering our people and providing sustainable growth.

**Our values**

- ▶ **Efficiency and effectiveness:**
  - We work daily toward a goal of development, balancing risks with opportunities.
  - We strive for innovation and the continuous improvement of our performance.
  - We optimize the use of our resources, providing value to shareholders and stakeholders.
- ▶ **Responsibility:**
  - We work in the interest of public well-being and environmental protection.
  - We are fully committed to meeting our responsibilities towards our customers.
  - We encourage our people to take on responsibilities to further our organization's success.
- ▶ **The strength of our people:**
  - We acknowledge effort, recognize talents and support their development.
  - We operate as a team, united with common goals.
  - We appreciate different viewpoints and support constructive arguments as a means of effective cooperation.
  - We respect, care about and support our team members.
- ▶ **Integrity:**
  - We focus on building and maintaining bonds of trust with our customers and partners.
  - We encourage sincere cooperation and communication with all our partners.
  - We operate in a fair and transparent way, with a focus on business ethics.

**Our vision**

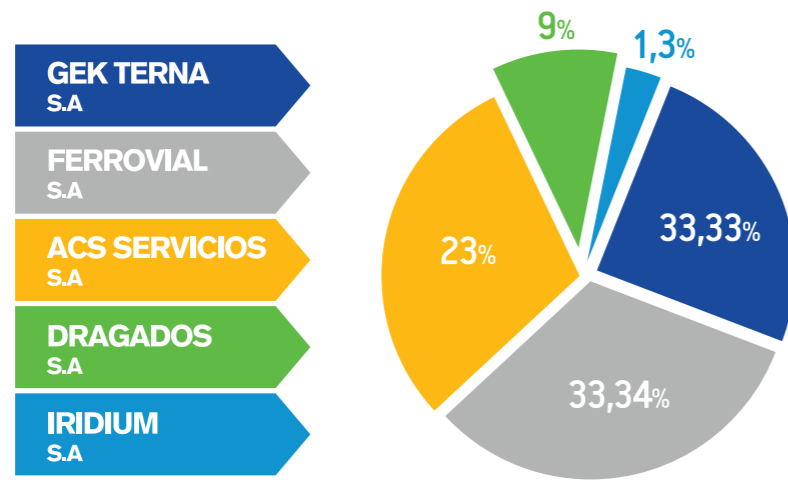
We are determined to change the map of Greece and set the standards for our sector. We create value for the country, the local communities and our shareholders, using as main vehicle our people's commitment, expertise and knowledge.

## Shareholder line-up

The shareholder line-up of Nea Odos, constitutes a major advantage and guarantees company's success. One of the major construction groups in the country, the GEK TERNA Group has joined forces with two of the largest construction groups in the world, Ferronial and ACS. We have achieved the exemplar combination of Greek reality's utter knowledge and international experience and expertise.

The following figure shows in detail shareholders line-up.

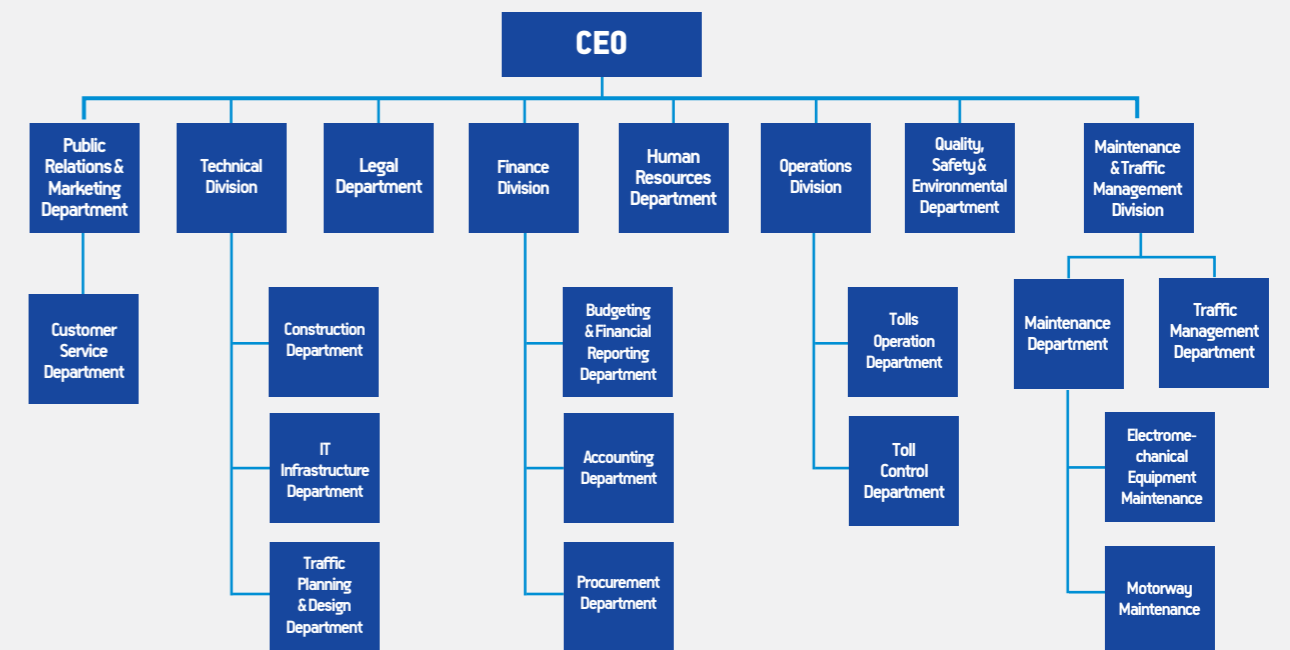
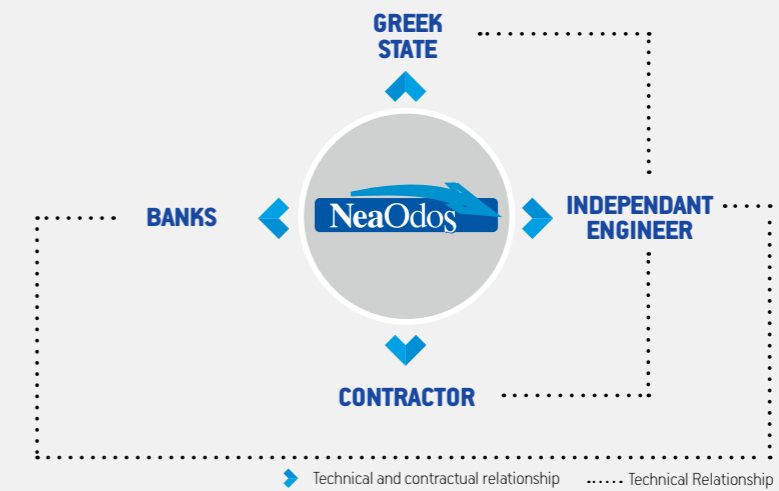
### Shareholder line-up of Nea Odos



## Organizational structure

The organizational structure of the company is at the core of all its activities. Our structure fully covers the business activities we are responsible for and further ensures consistency in disseminating our corporate vision, strategy and values that we represent.

As regards our organizational structure we have set distinct limits, clear roles and areas of responsibility to each function and segment in order to achieve smooth and efficient operation. This design enhances our joint efforts and allows us to promote and defend successfully the principles of responsible entrepreneurship and the legitimate interests of our shareholders.



ORGANIZATIONAL CHART OF NEA ODOS

## Financial Performance

The financial figures of the company present significant differences compared to 2014. This is attributed to the transition of the company to the Greek Generally Accepted Accounting Principles (GAAP). Changes in accounting treatments have led to variations of the financial data. All data in this Report, regardless of the date to which they refer, are under the Greek GAAP.

Financial information (in thousand euro €)	2015	2014
Net Sales	306.624,86	340.773,85
Other operating income	323,56	50,07
Revenue from financial investments	1.947,09	764,55
Total income	308.895,51	341.588,47
Operating cost	279.714,02	308.909,13
Employee salaries and benefits	7.648,36	6.162,73
Payments to providers of capital	6.984,83	6.331,45
Net profit/ (loss) before taxes	14.582,72	18.851,41
Net profit/ (loss) after taxes	17.067,87	19.174,32
Net profit/ (loss) per share (in €)	0,23	0,26
Total payments to state bodies (taxes paid)	9.977,93	11.644,92
Company investments	259.709,19	229.521,68
Company investments	589.411,76	589.394,64
Equity	205.207,14	188.091,16
Total liabilities	690.694,66	913.347,64
Total assets ((in million €)	898.460,72	1.103.406,70

Net sales (in th. €)	2015 (31 Dec)	2014 (31 Dec)
Exploitation segment of Ionia Odos – PATHE motorway	75.133.223,76	72.665.901,72
Construction segment of Ionia Odos Motorway	231.491.632,13	268.107.945,20
Total	306.624.855,89	340.773.846,92

### Total Passes for 2015:

**23.583.401**



Climate change affects our activities in various ways however we have not observed any significant risks or opportunities that stem from the effects of climate change on our business activity.

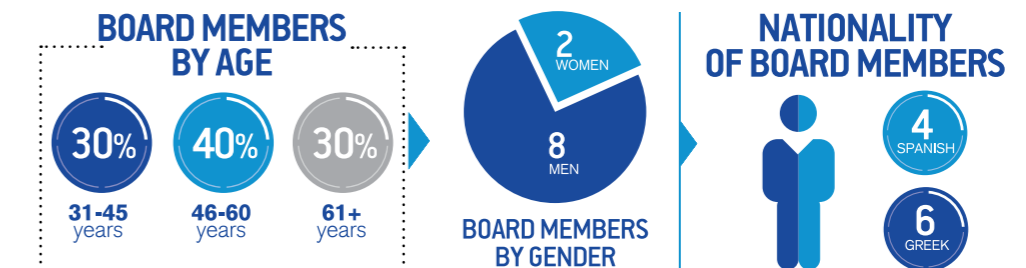
## Corporate Governance

At Nea Odos, responsible corporate governance is a prerequisite for the proper implementation of corporate strategy. At the same time It creates value for employees, shareholders and society. Absolute transparency and accountability serve our operation, our business behavior and our long-term vision for sustainable development.

### Our Board of Directors for 2015 comprised of the following 10 members:

- Emmanouil Moustakas – BoD Chairman, (Non-executive Member)
- Andres Sacristan Martin – Vice-Chairman, (Non-executive Member)
- Emmanouil Vrailas - CEO, (Executive Member)
- Antonio de la Llama – Member, (Non-executive Member)
- Juan Ramon Perez – Member, (Non-executive Member)
- Sofia Dimitrakopoulou – Member, (Non-executive Member)
- Maria Isabel Hernandez – Member, (Non-executive Member)
- Vasileios Delikaterinis– Member, (Non-executive Member)
- Alexandros Iosif Aligizakis– Member, (Non-executive Member)
- Christos Zaribas - Member, (Non-executive Member)

Executive members are entrusted with daily management responsibilities of the company, while the non-executive members provide support and advice on the strategic issues of the company. No significant changes in the composition and responsibilities of the Board of Directors were noted during 2015.



## The importance of Compliance

We operate in accordance with the Greek and European legislation, the relevant regulations as well as according to our values and business ethics that govern our business actions. Complying with the formal proceedings of the company, Nea Odos monitors closely and implements fully the environmental legislation, the legal requirements and all new regulations concerning its operation. Whenever feasible, the company surpasses the regulatory framework and implements best practices that are consistent with its vision, mission and values.

We conduct audits and analysis of legal and other requirements related to the company operation systematically, and at least once every six months.

The aforementioned audits form integral part of the management system applied by the company. No fines or other penalties related to violations of environmental legislation and other regulations were imposed in 2015 due to our effective compliance with all procedures.

During 2015 there were no incidents of non-compliance with laws and regulations concerning user's safety on motorways, or the signage on motorways. In addition, there were no incidents of non-compliance with regulations on communications, marketing, advertising and sponsorship.

The constant monitoring by our patrols have ensured the early identification and resolution of all cases with respect to the smooth vehicle traffic and motorway operation.

In 2015 no incident of corruption was noted internally and we did not cease our cooperation with partners because of incidents of corruption.

Nea Odos has yet to develop a comprehensive Code of Ethics for its suppliers. However, its policies are communicated and notified in a number of ways to its partners, suppliers and subcontractors, due to the nature and scope of the project. Especially regarding the cooperation with contractors, in order for them to undertake on site work, they are required to sign a declaration of conformity to the environmental requirements of the project. Contractors are formally bound to comply with the environmental protection requirements, take all precautionary measures for the environmental protection and they ought to have relevant certificates and valid licenses. Major company subcontractors, especially those in operation and maintenance, are undergoing regular environmental inspections and audits based on our management system, as well as through ISO 14001: 2004 systems that they comply with. It should be noted that no significant negative environmental performance of subcontractors has been observed. In 2015 no new suppliers were audited as to their compliance with the environmental criteria.

**Nea Odos monitors closely and implements fully the environmental legislation, the legal requirements and all new regulations concerning its operation.**

## Strategic approach

The technically accurate, timely and effective implementation of the concession project has been our top priority. To serve its purpose, **the company has developed and implemented a Quality Management System certified by the internationally renowned organization Bureau Veritas, in accordance with the principles of the Standard ISO 9001: 2008.** The system sets objective and measurable goals that are achieved through the implementation of specific processes throughout project implementation and operation.

All activities and functions of the company are subject to the accurate implementation and constant improvement of the Quality System. The obligation for the implementation of the Quality System is mentioned explicitly and clearly in the Concession Agreement and its related documents. This obligation is conveyed by contract to the Independent Engineer, constructor and any subcontractor involved in the project, who are bound to apply the highest possible quality standards in compliance with the system.

Furthermore, in 2015, Nea Odos was for the **first time certified** in accordance to **ISO 39001: 2012**, the standard which assesses the **Road Safety Management System** applied by the company. The standard describes the fundamental requirements of a Road Safety Management System and covers all the necessary requirements and aspects of road safety, including speed, condition of the fleet, and education - awareness of the driver. The standard aims to improve the company performance in the field of road safety through the reduction of road accidents and related impacts on human health and the environment. Its certification by the prestigious accreditation body TUV HELLAS, lends the required credibility and enhances users' confidence in company's services and infrastructure.



## Promoting Road Safety

Aiming at continuously improving its infrastructure and practices, Nea Odos actively supports the non-profit organisation **HELLENIC ASSOCIATION of TOLL ROAD NETWORK, which operates under the distinctive name "HELLASTRON"**. HELLASTRON was founded in late 2014 with the participation of all modern motorways and toll infrastructures operating in Greece. HELLASTRON was created with the aim to promote road transport in Greece.

The new entity aims to:

- The continuous improvement of the road infrastructures and the services provided to the users
- The promotion of road safety
- The promotion of research on transport issues through partnerships with relevant Organisations and Institutes in Greece and abroad
- The development of the science of construction and management of road infrastructures, the creation of skilled and informed personnel and the exchange of relevant know-how
- The exchange of relevant expertise and best practices with appropriate international associations
- The international promotion of Greece as road transportation hub due to its geographic and economic position

Road safety offers a ground where fruitful dialogue and synthesis of ideas can be accomplished. It requires the involvement, mobilization and cooperation of many different bodies, in order to shape and achieve an effective and comprehensive legal and regulatory framework in our country.

In this context, in 2015 a company representative participated as a keynote speaker at the **6th National Conference on Road Safety**, organized by the Hellenic Institute of Transportation and the National Technical University. At the conference, the actions and the scientific study on **"Use and development of modern recording tools of road traffic accidents on the PATHE highway"** were presented.

In February 2015, the company also took part with a speech in a technical seminar organized by the **European Road Federation**.

## Corporate Responsibility

### Our approach

Nea Odos listens carefully, understands and integrates in its planning policies that contribute to social stability, development and environmental protection. In this way, Nea Odos proves itself a responsible company that acts beyond its narrow business confines.

At Nea Odos we fully recognize and embrace this responsibility, just as it befits a responsible corporate citizen. We continue our efforts to delimit, organize, document and communicate all those parameters that constitute for us the concept of Corporate Responsibility. Within this context we have designed a comprehensive Corporate Responsibility strategy that aims to enhance gradually our active role, and at the same time to demonstrate how responsibility governs and determines our management approach and our business conduct.

By applying internationally recognized methodologies and a structured process, we defined the five pillars that configure our Corporate Responsibility strategy: Road Safety, Quality of Service, Human Resources, Environment, Cooperation with Local Communities and Social Contribution. A comprehensive action plan including an analysis of the current situation, goal setting and reporting followed. Since we published our first Report last year, we have strengthened our fundamental approach, we have enhanced our approach to Corporate Responsibility and expanded our portfolio of actions.

Main pillars of the management framework of Sustainable Development issues:



## Material Issues

Responding to our stakeholders' needs, limiting our company operation negative effects and capitalizing on future opportunities is our priority.

Our approach is being adjusted and enhanced. It is constantly evolving so as to incorporate new topics where deemed necessary and deepen on the existing ones.

***We remain loyal to the protection and promotion of sustainable development in the road transport sector.***

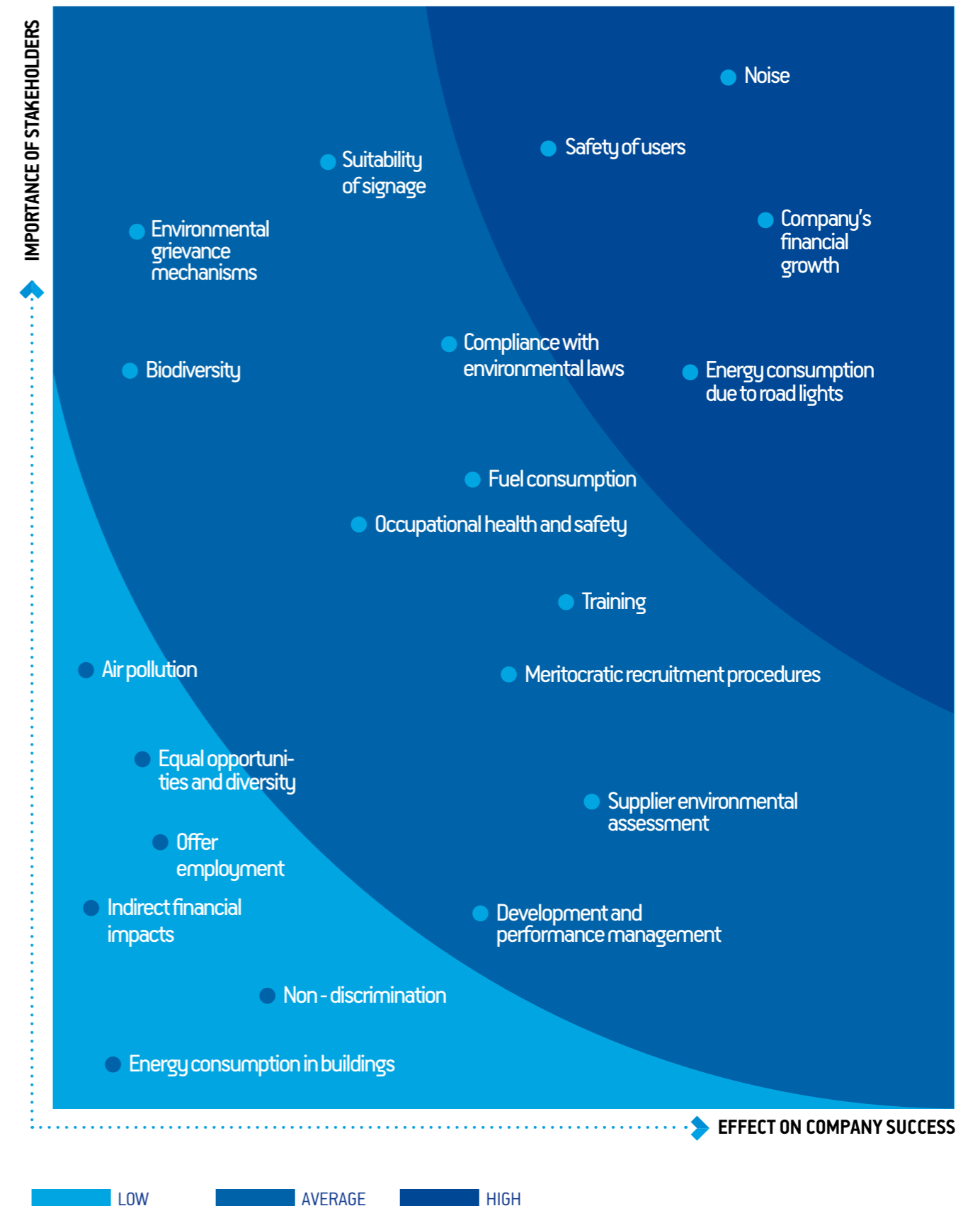
According to the principle of materiality, Corporate Responsibility key issues are those that have the potential to cause significant impact to the company. These issues can positively or negatively affect our relationship with our stakeholders, can create significant value or are associated with high risk areas for us.

While mapping our material aspects we also defined how important they are for Nea Odos. Our material issues were identified in 2014 during a series of dedicated exercises. In 2015 we continue to focus our activity on the same issues, while reinforcing our approach via systematic actions and measurable results:

- Company's financial growth
- Indirect financial impacts
- Fuel consumption
- Energy consumption in buildings
- Energy consumption due to road lights
- Waste management
- Noise
- Air pollution
- Biodiversity
- Compliance with environmental laws
- Environmental evaluation of suppliers
- Environmental grievance mechanisms
- Offer of employment
- Meritocratic recruitment procedures
- Training
- Development and performance management
- Equal opportunities and diversity
- Non-discrimination
- Occupational health and safety
- Safety of users
- Suitability of signage

**In 2015 we gave top priority to further analyze our stakeholders so that we could effectively respond to challenges related to our company operation.**

Via a methodical approach we were able to verify and cross-check the degree of influence our significant issues had both internally and externally. Since last year there has not been any change in our material issues. The impact on the internal and external environment by topic, is presented in detail in Annex A.



## The stakeholders of Nea Odos

### Mapping, Communication and Consultation

At Nea Odos we identified, analyzed and formally mapped our stakeholders as part of the process of developing and drafting the first Corporate Responsibility Report. All entities that are directly or indirectly related to our company, are affected by and may affect our actions, our policies and our overall business performance, are defined as stakeholders.

Being responsible means listening to and appreciating the needs of our stakeholders. Stakeholder mapping constitutes an important and essential tool that allows us to configure our Corporate Responsibility strategy on an accurate base.

The communication, the systematic dialogue and the cultivation of trustworthy relationships with stakeholders is a process in which we have invested heavily and is now inseparable from our operation. We consider the communication, the systematic dialogue and the cultivation of trustworthy relationships with stakeholders an integral part of our operation in which we have heavily invested in.

Our next steps involve strengthening these communication channels with our stakeholders and further promoting effective dialogue with them. We are convinced that through open and two-way communication we will be able to look deeper into our performance. At the same time we will be able to increase the positive impact of our business operations and Corporate Responsibility strategy.

Within this context, stakeholder analysis for 2015 was substantially enriched and strengthened. Our new approach on the systematic recording of our relationship with each key stakeholder is clearly reflected in the following graph. In this Report we present the frequency of communication with our stakeholders and the outcomes stemming from our 2015 engagement.



Main stakeholders	Communication mechanisms	Expectations/Main issues	Frequency of communication	Communication Results
EMPLOYEES	<ul style="list-style-type: none"> <li>Meetings between staff and management representatives</li> <li>Satisfaction surveys</li> <li>Email correspondence</li> <li>Prospectuses</li> </ul>	Development of skills/career prospects Regular communication between Employees management Informing employees about organisational changes and anything related to the company Emphasis on Health and Safety Additional benefits and remuneration system	Daily	Improvement of employees' development process through the establishment of Development Centers  Actions for the improvement of the working environment
USERS	<ul style="list-style-type: none"> <li>Customer service department</li> <li>Customer satisfaction surveys</li> <li>Complaint handling department</li> <li>Awareness campaigns</li> <li>Company website</li> <li>Emergency number</li> </ul>	Safe passage Quality, satisfaction and reliability Immediate response to incidents Immediate response to requests or complaints Private data protection	Daily	Interventions on the road network Improvement of signage
LOCAL COMMUNITIES	<ul style="list-style-type: none"> <li>Meetings with representatives of local communities</li> <li>Consultation with local associations and bodies of residents</li> <li>Partnership in volunteer actions</li> </ul>	Comprehensive information regarding effects from the company's operation on a local level and measures to address them Support of local economy – indirect financial effects  Sponsorships - charity actions and social investments	On regular time intervals/ Daily	More targeted support for the local community
SHAREHOLDERS	<ul style="list-style-type: none"> <li>Monthly Board of Directors meetings</li> <li>Regular reporting</li> <li>Company website</li> </ul>	Financial performance Regular and correct information/reporting Effective governance mechanisms	On regular time intervals/ Monthly	Mapping of environmental and social impacts of the company and communication through the Corporate Responsibility Report
NGOs/ACTIVISTS/LOBBIES	<ul style="list-style-type: none"> <li>According to company policies</li> </ul>	Reduction of toll rates as described in the Concession Agreement, which is ratified by the Greek Parliament and constitutes a State Law.	When deemed necessary	Interventions where possible to ensure smooth user service
MINISTRY OF INFRASTRUCTURE	<ul style="list-style-type: none"> <li>Events and fora of the transportation sector</li> <li>Consultation with institutions</li> </ul>	Law-abiding policy strict compliance with Greek and European laws Support of programs and initiatives of the Ministry at the level of national transportations Participation in public dialogue on road transportation	When deemed necessary	Full compliance with the law
MOTORWAY TRAFFIC POLICE	<ul style="list-style-type: none"> <li>Scheduled and unscheduled meetings with Traffic Police representatives</li> </ul>	Compliance with laws Support to Traffic Police work Cooperation and consultation	When deemed necessary	Intensification of readiness exercises
FINANCIAL INSTITUTIONS	<ul style="list-style-type: none"> <li>Ongoing communication</li> <li>Meetings</li> <li>3 and 6-month reports</li> </ul>	Comprehensive information on company performance Financial effectiveness Consistency in its financial obligations Compliance with laws and good governance Risk management and company growth prospects	On regular time intervals	Full compliance with the law Analysis of social and environmental risks
SUPPLIERS/ASSOCIATES	<ul style="list-style-type: none"> <li>Procurement department</li> <li>Ongoing communication with partners in the implementation of projects</li> </ul>	Transparency in procurements Meritocracy in selecting suppliers and partners Compliance with agreed partnership terms Transparent governance mechanisms	Daily	Compliance with deadlines Application of supplies' manuals

# Road Safety

## Responsible Road Behavior

Road safety is a major issue in our country with far reaching implications, both at a social and an economic level. According to official comparative figures of the recent World report on road traffic injury prevention (2015, data 2013) of the World Health Organization, officially about 850 people are killed each year, while unofficially victims exceed 1.000. At the same time, the cost of road accidents ranges from 1,5 to 5% of GDP. This high cost justifies the need to evaluate it in relation to national economy.



Travel and road safety cannot be approached unilaterally, as they form part of a complex equation, with factors including the user (driver, passenger, cyclist, pedestrian), the vehicle, the road infrastructure (roads, signage, signaling, lighting) and the control (monitoring, policing, prevention, care, maintenance).

We acknowledge that solutions are complex and that numerous parallel actions by different bodies are required. At Nea Odos we work systematically 365 days a year, to assure the safety and quality of the road environment; we invest in increasing drivers' awareness as regards proper road behavior and abide to a holistic framework which exceeds legal and regulatory requirements.



**Road safety is placed at the core of our philosophy.**

*Our greatest responsibility lies in promoting its principles and establishing a safe driving culture. In our strategy, actions and initiatives, we have given prominence to the issue of road safety. We have assumed responsibility for road safety both towards our motorway users and the society as a whole.*

In 2015, Nea Odos **was certified for the first time** in accordance with **ISO 39001:2012**, the standard that assesses the **Road Safety management** systems applied. The standard provides state-of-the-art inputs for all the aspects of road safety, including speed, condition of the vehicle fleet as well as driver education - awareness.

We focus on securing a safe and high quality motorway, improving driving behavior, namely addressing incidents of aggressive and high speed driving. As part of our certified management system, a series of operational procedures have been established and adopted in order to protect the safety of the motorway users. These procedures define the framework of actions and the necessary arrangements that ensure safe and uninterrupted traffic flow.

## Promoting Road Safety

On a daily basis, we strive for optimal maintenance of the motorways that are under our responsibility, while at the same time We make constant efforts to offer accurate information and excellent service to all users.

To a considerable extent road safety is a matter of education, therefore a drastic behavior and mentality adjustment is required. Considering this, we aim at cultivating early driving awareness and safe driving behavior. We want to actively contribute to the establishment of a road safety culture in order to achieve, a drastic reduction in traffic accidents and fatality rates in our society.

In 2015 we implemented several campaigns to raise motorways users' awareness. More specifically, we distributed leaflets to drivers with tips for safe driving in extreme weather conditions and in tunnels. In collaboration with the **Road Safety Institute "Panos Mylonas" – I.O.A.S.**, and other Greek concessionaire companies, we participated in a large scale awareness campaign during the European Day of Courtesy on the Road.

It is worth mentioning two additional campaigns that were undertaken as part of our participation in the association HELLASTRON; one focusing on the safety of our employees on the motorway and the drivers' awareness as regards motorway employees, and the second focusing on the proper use of emergency lanes (E.L.).

Through our ongoing annual initiatives and our participation in road safety campaigns we aim to increase the percentage of drivers that apply and respect road safety regulations and encourage them to improve their driving behavior. In 2015 our total financial investment in awareness campaigns reached € 6.753.



## Ensuring User Safety

Human life is a non-negotiable value and the safety of the drivers and passengers of the vehicles travelling on the highways managed by us is very important to us.

At Nea Odos we tirelessly work in order to protect human life and we focus on three main axes:



More specifically, since we apply measures in order to continuously improve the existing infrastructure and retain the high quality construction, we focus on the following:

- Redesign and construction of interchanges
- Improvement of vertical and horizontal signage
- Replacement of safety barriers
- Study and construction of works related to road safety (drainage, irrigation, etc.)

**We contribute to the reduction of accidents by taking all the necessary measures for the prevention of primary and secondary incidents, placing emphasis on construction specifications, operational readiness and use of new technologies.**

The company has designed and applied systems which offer updated traveler information and timely incident response. Systems utilize modern technology, the internet and drivers can receive further assistance via the Emergency Call Centres.

### Variable Message Signs (VMS)



6 signs are currently in operation. In 2014 we set a target of 4 new billboards and in 2015 we completed the required study. Their placement will be completed in 2016

### Internet



Information is provided about traffic and alternative routes, in case of traffic rearrangements and diversions, possible obstacles and extreme weather conditions

### Emergency Call Centre Services



The 4-digit emergency telephone number 1075 is available on a 24-hour basis

## Road Safety Management

At Nea Odos we are proud that since assuming the responsibility for the section of the PATHE motorway, the incident and accident rates have dropped by 62,6%. This success is also attributed to the holistic Road Infrastructure Management and Maintenance System implemented by the company for the purpose of strategic management, assessment and maintenance of the motorway. The system includes:

**MAPPING**  
of the existing infrastructure

**MONITORING SYSTEM**  
of road behavior, maintenance and improvement of the road network

**PERMANENT MAINTENANCE**  
(REGULAR OR AD HOC) of the motorway

**REDUCTION**  
**62,6%**  
INCIDENT AND ACCIDENT RATES

Nea Odos applies specific measures in regards to road safety management and takes responsibility for the following:

- Statistical traffic accident data analysis and identification study of hazardous locations in urban and interurban network where the company operates
- Implementation of measures for the improvement of safety at the statistically identified hazardous locations
- Systematic monitoring of the evolution of road safety indicators

## The Role of Signage

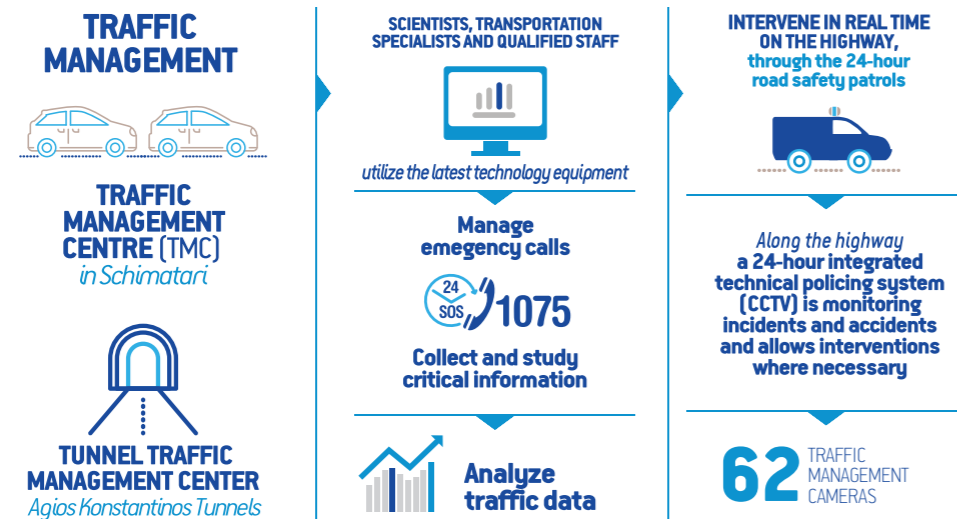
Highways signage is a decisive factor in road safety, and for this reason the parts that are under Nea Odos' responsibility, are in full compliance with the relevant provisions of national and European legislation and other relevant regulatory frameworks.

Our company trains road safety patrol drivers and engineers and ensures they are well aware of the signage plans included in the Concession Project. During the daily technical inspections conducted at each shift, the drivers and the engineers check and monitor all the signage located along the motorway and proceed to the necessary interventions/ adjustments.

The signage on the motorway follows the obligations stipulated in the Concession Agreement and the approved study of the Independent Engineer (DAC0596B certification number). The Independent Engineer is responsible for monitoring the studies, the Operation and Maintenance Manuals, ensuring execution of work according to the contractor's Quality System and the relevant legislation Ensuring that the motorway will remain open and safe for the users is the ultimate goal.

## Traffic Management

Road safety is located at the centre of our attention. This becomes evident by the actions we design. The coordination for the entire highway is conducted through the well-equipped Traffic Management Centre (TMC) in Schimatari, which operates 24 hours a day, 365 days a year. A special Tunnel Traffic Management Center covers the Agios Konstantinos Tunnels.



We have reached the conclusion that the severity of accidents occurring in tunnels requires both an upgrade of the existing system and the tightening of the 24-hour monitoring system. The company currently operates 62 24-hour surveillance cameras, while 19 more cameras are scheduled to be added to PATHE motorway. All the required additional equipment and applications' installation studies for the most vulnerable sections of the motorway were completed within 2015.

## Operation and maintenance

As a living organism in continuous operation, the highway requires constant maintenance. Since Nea Odos's main objective is to ensure the safe and fast transport of the users, it runs an extensive preventive and corrective maintenance schedule.

The preventive maintenance program includes:

- Restoration of roadway damages
- Maintenance of channeling islands, of vegetation, and maintenance of all structures,
- Motorway cleaning
- All maintenance of electromechanical installations, safety equipment and motorway protection, irrigation and fire extinction system etc.

The improvement maintenance program includes:

- Roadway replacements
- Major interventions in technical works and buildings
- All the investments necessary for the modernization of the electrical and mechanical installations and electronic equipment

## Special Winter Maintenance Program

Especially during winter time, when adverse weather conditions usually occur, the company implements a specially designed winter maintenance program.

This special program includes the provision of sufficient salt quantity, salt filling stations, maintenance of snow-removal equipment, the cleaning of manholes and drainage infrastructure, and the improvement of horizontal and vertical signage' reflectivity.

The winter maintenance program includes regular alert exercises with all involved authorities, for the safe transport of vehicles, control of delays due to extreme weather conditions and the safe and uninterrupted execution of maintenance work.

## Extreme weather conditions

Ensuring the safe vehicle traffic on motorway is particularly important during winter months, when extreme weather events are more frequent. The effective response to extreme weather conditions, such as heavy snowfall or frost on the road, requires excellent coordination and abiding by specific procedures related to unscheduled traffic disruptions. Our certified processes guarantee effective prevention, response and remedy of potential issues.

### Prevention Actions

- Consultation with the Police, Fire Dpt, Emergency Ambulances, and necessary extrernal bodies
- Open communication channels with responsible personnel for the implementation of security procedures and intervention in emergency situation
- Continuous training of personel involved
- Ensuring availability of human and material resources required in case of crisis

### Immediate Response Actions

- Early detection and confirmation of incidents on the motorway
- Notification / update of the external bodies (Police, Fire Dprt, Emergency Ambulances, Collection Units)
- Mobilisation of road safety patrols for quick intervention
- Implementation of security and intervention procedures in emergency situation
- Contribution of the Police for the safe management of traffic on the mororway and the maintenance of a safe environment for motorway's users
- Restoration of normal traffic conditions
- Management of Media and commercial issues (Service Stations, Toll stations)

### Actions of Immediate Restoration

- Assessment and implementation of replacements / repairs to the motorway infracture or equipment
- Consultation with the Police and authorities
- Active support and physical and mental rehabilitation of the personnel involved an the emergency incident

## Management of Emergency incidents

To Nea Odos the efficient management of emergency incidents is the sine qua non of effective highway management. Emergencies are those situations that require broad range of actions, ranging from the removal of debris as a result of a road incident, to responding to natural disasters.

Our employees are adequately trained and have access to the necessary equipment. At the same time we offer the services of below to our users in order to help them deal with emergencies:

- A 4-digit emergency telephone number (1075)**  
 that drivers can call either from their cell phone or from the emergency phones placed along the motorway or the tunnels.
- The Motorway Traffic Management Center and the Tunnel Traffic Management Center**  
 using cutting-edge equipment and therefore ensure safe circulation and address all incidents in a timely and effective manner.
- 24 hour Patrol & Intervention units**  
 that continuously monitor the entire length of motorway. In cooperation with the Traffic Management Centre, the 4-digit emergency telephone number and the competent State services, the Nea Odos patrol units can assist all drivers.
- The emergency (SOS) phones**  
 located along the motorway where drivers can contact directly the Traffic Management Centre at no cost.
- Free road assistance to immobilized vehicles**  
 to ensure their transfer to a safe place avoiding the creation of obstructing traffic situations.

## Patrols and Safety inspections

The road safety patrols are conducted by the patrol drivers on a daily basis, 24 hours per day, including weekends and public holidays.

The road safety patrols have a number of important responsibilities, including:

- Road incidents/ accidents management
- Conducting emergency intervention patrols / road safety
- Check for any damage to infrastructure (roads, fencing, guardrails, lighting)
- Identification of emergencies
- Removal of foreign objects from the road
- Assistance to immobilized vehicles
- Signage of emergencies
- Assistance for removal of immobilized vehicles
- Assistance to public authorities
- Assistance in extinguishing fires, until Fire Department intervenes
- Escorts for oversized loads when deemed necessary
- Escorts for vehicles with hazardous loads through tunnels when deemed necessary
- Inspections of infrastructure and highway equipment
- Identification of upcoming risks for users

The technical road inspections are performed regularly by the Engineers of the Maintenance Department.

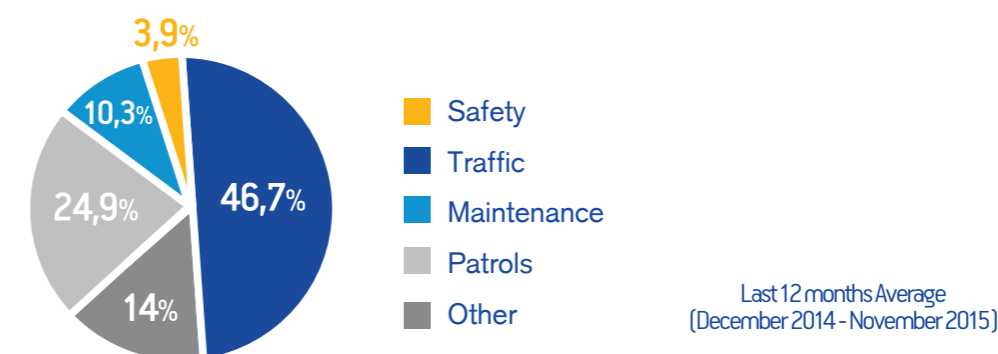
## Pilot installation of Weight Measurement in Motion EN

In 2015 Nea Odos proceeded in a pilot installation of EN Weight Measuring in motion (WEIGH-IN-MOTION) at Sirius. The aim of this initiative is to collect information about the excess weight vehicles under category 3 and 4.

The adoption of the dynamic weighing systems technology and the establishment of permanent stations will help in monitoring the traffic of vehicles.

The company aims at installing an extensive network of weight measurement in motion within the next two years, since overweight vehicles are associated with serious accidents which increase the likelihood of serious injury and high maintenance costs of road network.

### ISSUES PER CATEGORY (Motorway Traffic Management Center)



NEA ODOS AVERAGE RESPONSE TIME PER INCIDENT TYPE (in MINUTES)	December 2015	Last 12 months Average (December 2014 - November 2015)	
Accidents and Crashes	9,9	9,2	+8%
Vehicles breakdown	6,9	7,7	-9,4%
Abandoned Vehicles	13,4	15,7	-14,6%
Obstacles – Spillage - Moving Hazard	9,3	9,5	-2,1%
Other types	8	11,5	-30,4%

▶ ROAD MAINTENANCE LABOUR HOURS PER CATEGORY <small>Last 12 months Average (December 2014 - November 2015)</small>	
Green Areas and Trees	1.989,25
Motorway drainage system	950,09
Cleanliness	654,26
Tunnels, Cut and Cover, Landfills and Trenches	249,17
Shoulder, traffic islands, kerbs-gutters and sidewalks	242,17
Road Surface	225,15
Motorway Safety and Protection Equipment	207,21
Motorway Signage	187,62
Common and Special Bridges	123,90
Support walls and avalanche retaining walls	86,05
Other (material transportation, tidiness, training, etc)	59,00
Winter Maintenance	50,60
Fire safety	32,69
Buildings	21,54

▶ MAN HOURS SPENT IN ROAD INFRASTRUCTURE INSPECTIONS PER CATEGORY <small>Last 12 months (Total) (December 2014 - November 2015)</small>		
Winter Maintenance	1.033	64,7%
Tunnels, Cut and Cover, Landfills and Trenches	342	21,4%
Support walls and avalanche retaining walls	132	8,3%
Motorway Safety and Protection Equipment	67,1499	4,2%
Motorway drainage system	21,7001	1,4%
Signage bridges	0,3167	0%
Motorway Signage	0,0167	0%
<b>Total</b>	<b>1.596,1834</b>	<b>100%</b>

## Quality in services

### Quality is our Top Priority

**Our main concern is to make every single user feel that Nea Odos is the best possible travelling companion!**

Loyal to our values and vision and true to our mission, we constantly seek to improve the quality of our services.

We apply consistently our internal processes and quality standards as imposed by national and European legislation without hesitating to implement even stricter policies where necessary.

Our **Quality Management System** implemented since 2009 is certified according to **ISO 9001: 2008** and is regularly upgraded in order to meet the rising demands and requirements of the motorways' users. In addition, it helps to improve the quality of our partners and suppliers' services. This way we ensure:

- Continuous improvement of our processes' effectiveness
- Continuous improvement of our quality and efficiency
- Maximum compliance with the concession terms



### Customer-driven Approach

At Nea Odos we focus on the safety of the users of the motorways we operate and maintain. We strive to keep our customers satisfied not only through concrete actions, but also through the road safety and customer support services we have designed and offer. Ideally, every user will feel that we are the best traveling companion for them!

With a view to constantly improving our services we stay in in close contact with the users of our motorways. Without exception, all of our stakeholders can contribute to the upgrade of our services and thus we listen carefully and offer immediate, responsible and reliable service. The design and implementation of a fully people- centered service system constitutes our conscious strategy which we strongly believe it contributes to our social responsibility.

## Continuous Communication

Our strategy for continuous two-way and meaningful communication is based on a specific channel system, structured in a way that:

- **Takes into consideration** the opinion of the stakeholders affected by our operation and services
- **Includes** all stakeholder groups along our motorways
- **Collects** periodically stakeholder views and opinions in order to outline trends
- **Records** holistically the issues that occur and seeks solutions
- **Prevents** and resolves imminently arising issues
- **Urges** stakeholders to indicate any oversights
- **Informs** about the strategies, actions and outcomes

To this end, we adapt and evaluate our procedures, collecting and analyzing every comment or suggestion.

### Our main tools include:

1) **Opinion surveys** that help us collect critical information about the satisfaction of our users. The company has established a relevant procedure and conducts every 18 months a customer satisfaction survey regarding their demands and expectations. The next survey is scheduled for 2016. According to survey results for 2014 on a sample of approximately 3,000 drivers, over 90% of surveyed drivers maintain a favourable opinion (very and quite satisfied) of our entire personnel and the various services we offer.

2) **Customer Care Call Centre** that has been set up to provide responsible and comprehensive information about our services, and to ask of questions, to submit complaints or suggestions. Alongside with the surveys, our company encourages drivers to identify any omission or submit any question to the appropriate department of the company. Those interested can call the number 22950-26900 during weekdays and Saturday (08.00-20.00) and Sunday (10.00-18.00).

### 3) **Email Customer Service**

Nea Odos has an email account solemnly dedicated to customer service. All users can send an email to [customer-care@neaodos.gr](mailto:customer-care@neaodos.gr).

### 4) **Four-digit emergency call number 1075**

Users can call from a mobile phone or from the emergency phones places along the motorway or tunnel to alert for emergencies.

### 5) **Emergency (SOS) phones**

Users can use the emergency phones located along the motorway to communicate free of charge, with the Traffic Management Centers (TMC).

### 6) **Customer Care Centre (CCC)**

The CCC of Nea Odos is available to any user seeking information regarding any of the services provided, or a planned itinerary, or wishing to give customer feedback thus contributing to the continuous improvement of our services. The Customer Care Center is located in Afidnes, towards Lamia, before the Afidnes toll station. (33 km. New NR, Afidnes) and operates weekdays and Saturday (08.00-20.00) and Sunday (10.00-18.00).

### 7) **Motorist Service Stations (M.S.S)**

At Nea Odos 4 MSS located along the highway, at Varibobi, Kapandriti, Malakasa and Schimatari provide 24 hours a day refueling and catering services. Additional commercial and other services are available during working days and hours.

### 8) **Newsletters**

Nea Odos systematically informs drivers on road safety issues and provides advice on safe, fuel efficient and environment friendly driving. The leaflets are available to download from the Nea Odos website.

**A fundamental principle of Nea Odos' Corporate Responsibility is the effective communication with the stakeholders affected by our operations and services, and especially with customers-users of our motorways.**

The excellent relationship we have built with our customers and our stakeholders, and in which we invest daily, has led to zero grievances and complaints regarding major environmental impacts.

In 2015 we received, managed and resolved only one complaint in Kamena Vourla related to noise levels. After measurements and according to the necessary control procedures, the installation of noise barriers was approved at that respective point in order to resolve the issue. The installation will be completed within 2016.

## Personal data privacy policy

Our principles, business ethics as well as the utmost respect for the identity of each user, require the protection of privacy and security of our subscribers' personal data. We comply with the Hellenic Data Protection Authority guidelines, and constantly invest in upgrading our information and data collection management system.

At Customer Care Call Centre all calls are recorded so that we can improve the quality of our services. Relevant files are kept for no more than 15 days. Relevant message during all calls informs customers of our practices.

The cameras that are installed along the motorway serve exclusively as their sole aim the regulation of traffic, the identification of emergencies and the safety of the users. Numerous information signs have been installed to inform drivers regarding security cameras.

The closed circuit television and computer screens located at the control centers of the Traffic Management Center, provide access to information and visual material. The management of this material is governed by the Data Protection Law and by the relevant «Instruction for CCTV» of the Hellenic Data Protection Authority. Nea Odos strictly prohibits the use of closed circuit television for observing any use not pertinent to the safety and smooth operation of the motorway.

The company has taken all necessary measures to ensure maximum security in online transactions. The security is achieved through a specialised safety certificate that ensures the high level of content encryption. At the same time this certificate verifies that the website content stems directly from the company ensuring that no third party intercepts or interferes with the communication.

In any case, in compliance with the provisions of the relevant legislation, the users of Nea Odos can always exercise both the rights to access to information that concerns them and the right to object to the use of this information.

## Toll fares

Ongoing investments are required in order to maintain the quality features of any contemporary motorway. The toll revenues are one of the most effective methods of financing construction, maintenance and continuous upgrade of both the infrastructure and the services offered.

The toll rates and their adjustments are described in detail in the Concession Agreement, which was ratified by the Greek Parliament and constitutes a State Law. The toll rates are not determined only by the Concessionaire.

The regulatory framework of Nea Odos defines three toll payment zones:



The toll fee value for each station is determined as follows:

- At each frontal toll station and per direction, the toll rate is determined based on the total length of the zone to which it belongs
- When exiting the motorway from a lateral toll station, the toll rate corresponds to the length travelled from the beginning of the zone where the station belongs, up to the station. When entering the motorway from a lateral toll station, the toll rate corresponds to the length of the road to be travelled by the user from the toll station to the end of the zone
- The height of the vehicle and the number of axes

The payment of the tolls has been designed in a fair way so as to ensure that **under no circumstances will the user be charged twice for the same journey.**

## Methods of Tolls Payment



### Cash payment to the toll collector

It is the most popular method for toll payment. This refers to physical cash payment to the toll collector in all lanes that bear the relevant sign.



**Fast Pass** is a new payment method, implemented by Nea Odos for the first time in our country. All toll plazas run by Nea Odos have electronic lanes, available for use by the subscribers to the new electronic toll payment service, Fast Pass.

Through the electronic transponder, **provided free of charge**, the system “reads” the device, detects the bill, pays the equivalent of toll fee and the boom gate opens automatically.



### Special Automatic Toll Payment Machines: Innovation in Toll Payment

Nea Odos **was the first to launch in 2011** in Greece the Automated Payment Machines, a new and innovative payment method. The machines are located in each frontal and lateral toll station offering additional payment methods.

Users follow a very simple and quick procedure. The user places in the special basket the price of toll fee, the traffic light turns on green, the machine issues the proof of payment and the boom gate opens! In case any issue arises during the transaction, the user is automatically connected to a company representative. This service is available on a 24-hour basis.

## Responsible Supply Chain

Our commitment to quality and safety of the highways extends to our commercial partnerships. The safety of our motorways' users requires careful selection of our partners with regard to the services and products provided to us. Prerequisite for entering and maintaining our trade partnerships is the compliance of the partners with the requirements, standards and principles that we abide by.

The procedure applied for the selection of our suppliers meet the requirements of our Quality Management System:

- **Supplier and contractor selection process commences as an open competition**
- **The procedures require bids from at least three different vendors**
- **The material specifications are always pre-defined by Nea Odos**
- **The optimal offer provides the best relation between price and quality. The main selection criteria within this framework are: responsible management of the partner, quality specifications, service level, availability, after sales support, economic terms**

Existing suppliers are assessed annually on their performance according to a specific process that takes account of the level of compliance and adequacy based on the established company criteria.

Our supply chain includes both operational and management services and therefore we collaborate with a variety of subcontractors. The construction of Ionian Road and the maintenance of PATHE, have been assigned to third parties (contractors). As a result, these contractors are directly responsible for supplying the necessary materials, required for the construction and the maintenance activities.

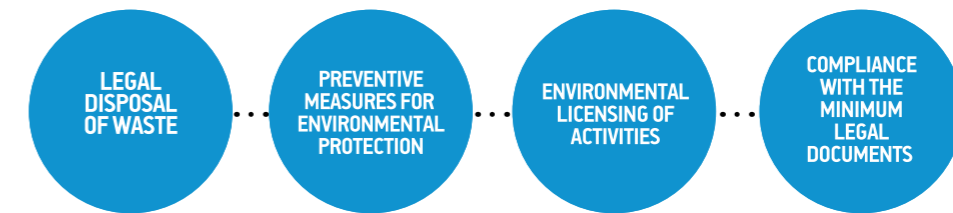
The bulk of the material supplied to the Nea Odos mainly refers to maintenance of electrical installations of the motorway and includes electronic/ electrical components/ materials, electromechanical components/ products, industrial equipment (generators, tools, paint, asphalt, etc.), building materials, signage types, tissues, thermal rolls. Moreover, we source directly products related to personal safety and security, clothing, technology equipment (server, PC, laptop, tablet, mobile, etc.), consumables and pharmaceutical.

The main groups of Nea Odos suppliers are:

- **The construction J/V**
- **The planners**
- **The suppliers employed exclusively for the construction of the project**
- **The subcontractors mainly involved in the maintenance of PATHE (maintenance, snow removal, maintenance of E/M installations, etc.)**
- **The suppliers of consumables who contribute to the maintenance of the motorway and the function of management teams**
- **The service providers supporting the company's administrative management (attorneys, certified auditors, etc.)**
- **Suppliers of other consumables not related to the maintenance, construction and operation of the motorway**

Apart from the above criteria used in the suppliers' selection process, Nea Odos records the official certifications of the suppliers, related to their business activity. These certificates serve as a guarantee of the quality of services and products of our suppliers. In this way we can ensure and maintain the quality that we seek and we are committed to offer to our motorways' users. Our most important suppliers have achieved one or more of the following certifications: **ISO 9001: 2008, ISO 14001: 2004, ISO 22000: 2005 EN 361: 2002, EN 358: 1999.**

This way we ensure (depending on the nature of the partner):



As far as operation and maintenance works are concerned, continuous audits for compliance with the relevant environmental legislation and project conditions are conducted.

In its supplier selection or assessment criteria, the company does not address issues related to basic human rights (other than health and safety). Our company does not carry out audits for this purpose; however, because of our close relationship with our suppliers no illegal or unethical behavior has come to our attention. There was no recorded case of no selection of partners due to non-compliance with basic human rights criteria.

When analyzing potential risk areas for suppliers and the company, we examined the possibility of child labor or forced or compulsory labor incidents. Given the nature of our business and manual labor requirements we do not consider that our or our partners' activities bear a significant risk of such incidents.

In 2015 an incident of low quality products from one of our supplier, concerning office supplies was recorded. Since the respective supplier had not sent us the required certifications referring to the production process and environmental protection, we terminated the co-operation.

## Local Economy and Suppliers

The relationship that we develop with our suppliers is of major importance to us, as it allows us to contribute to the effective development of the local communities in which we operate, and goes beyond any formal partnership terms. By strengthening local suppliers we strengthen the economic stability and social prosperity of the areas our highways pass through.

It is due to the valued relationship we have established with our local suppliers that we hold and sometimes exceed our payment policies to support them.

Categorisation of suppliers	2014		2015	
	NUMBER OF SUPPLIERS	INVESTMENT (€)	NUMBER OF SUPPLIERS	INVESTMENT (€)
Local	273	2.167.423	236	2.085.539,29
National	190	243.893.941	211	280.931.983,61
International	22	1.359.090	18	2.235.606,46
<b>Total</b>	<b>485</b>	<b>247.420.454</b>	<b>465</b>	<b>285.253.129,36</b>

### Analysis of suppliers per category/origin and expense

Based on certified processes, the evaluation of the supplier is carried out by the responsible managers on an annual basis. The minimum criteria the main suppliers and subcontractors are assessed for are:

- Meeting deadlines
- Quality of relationships
- Ability to respond
- Product/ Service Availability
- Product/ service compliance to standards
- Compliance with safety and hygiene regulations
- Price
- After Sales Service

Achieving a low score may lead to non-renewal of the contact with the respective supplier.

**Supporting our local suppliers is a matter of responsibility.**

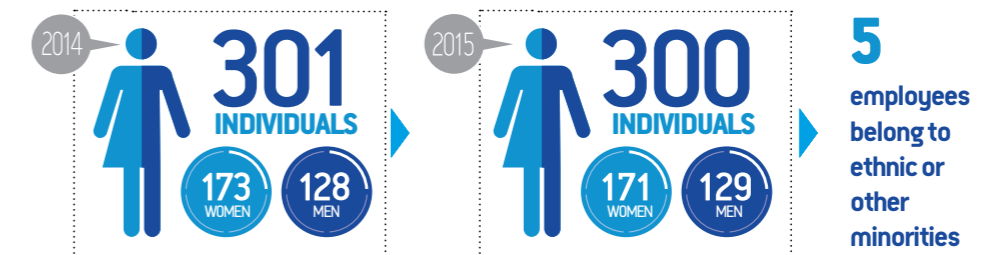
## Human resources

At Nea Odos we acknowledge and recognize that our people are the driving force behind our company as they are the determining factor in our success. Without our capable people no goal is achieved and no strategy is implemented. Having faith in the vision and values of Nea Odos, our people work hard and consistently in order to satisfy every single customer.

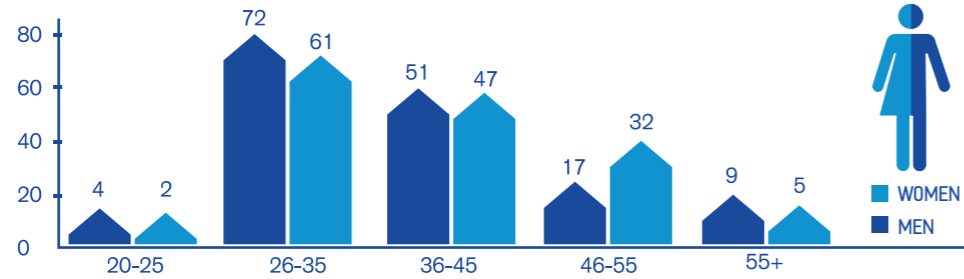
All the departments of the company are staffed with remarkable employees, trained staff, experienced technicians and ambitious young people who start their career at our company. Nea Odos offers its employees the opportunity to work for a company with an important role in our country's development. Within this context they can benefit from the expertise of the large multinationals that constitute our shareholders.

We utilize the knowledge, skills and talents of our people and we support them by offering them equal opportunities and a safe working environment. With the performance evaluation system being our key tool, we ensure fairness and honest communication; we reward the effort, identify talents, cultivate the skills and support the development of our people.

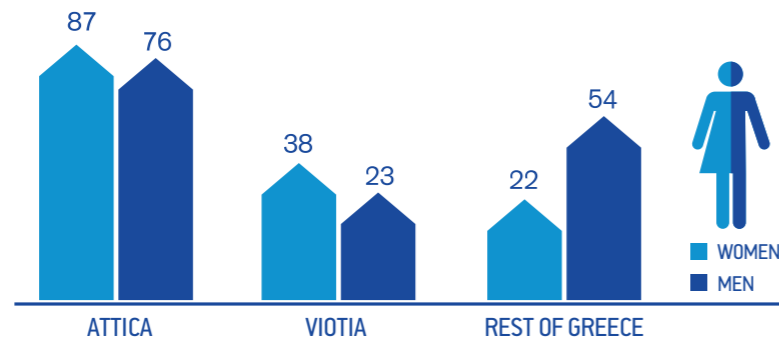
In 2015, Nea Odos employed 300 individuals, 129 men and 171 women. Of the 300 individuals, 5 employees (3 men and 2 women) belong to ethnic or other minorities.



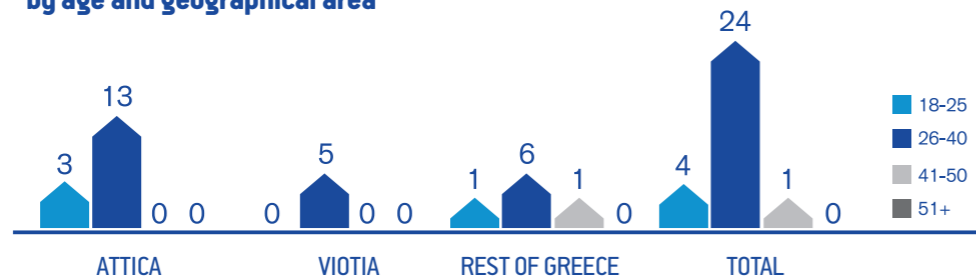
► **Distribution of human resources by age and gender**



► **Distribution of human resources by geographical area and gender**



► **Total new employee hires by age and geographical area**



**All our employees work on a full-time basis.**

The majority of our employees (94%) are covered by individual indefinite term contracts. The 5,33% of all staff is covered by project contracts, while individual fixed-term employment contracts cover 0,67% of our staff.

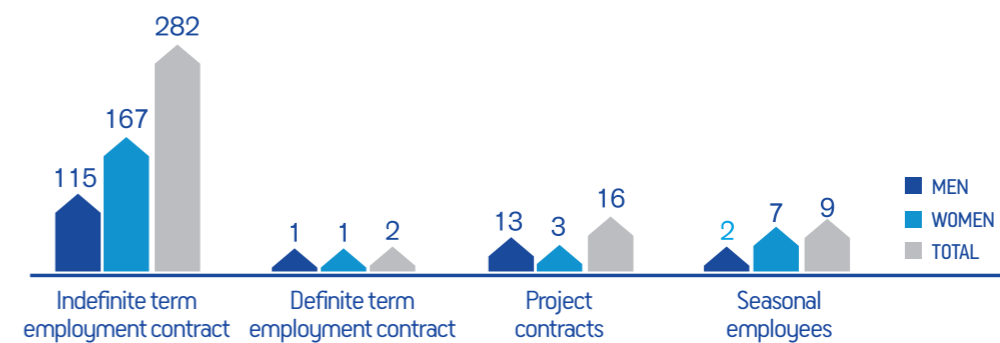


It was deemed appropriate to include the project-contracts as a new category in our 2015 analysis, in order to present a more complete picture of Nea Odos.

Additional seasonal workers are employed at Nea odos via employment agencies we co-operate with on a permanent basis. They cover defined ad-hoc or seasonal needs of the company, including maternity leaves.

	► 2015			► 2014		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Total Staff	129	171	300	128	173	301
Indefinite term employment contract	115	167	282	113	167	280
Definite term employment contract	1	1	2	2	1	3
Project contracts	13	3	16	13	5	18
Seasonal employment contract	2	7	9	1	8	9

► **Human resources by type of employment, employment contract and gender**

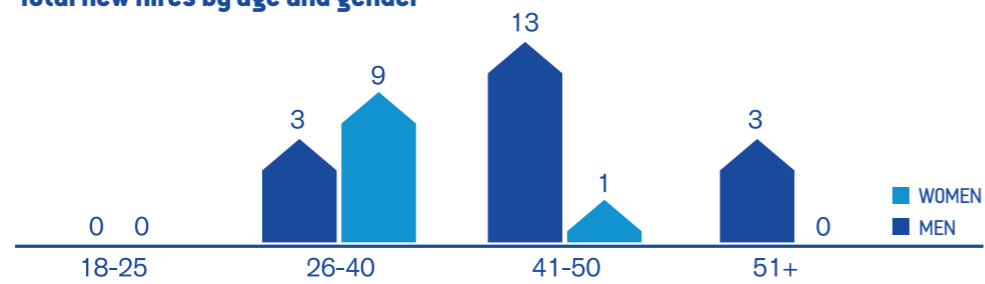


## Employee turnover

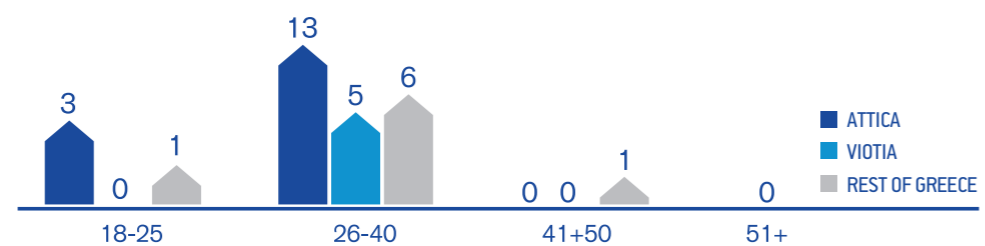
Although we are going through difficult times in both the economy and business affairs, we have managed to maintain a healthy balance between recruitment and employee turnover. More specifically, in 2015 30 people left the company (due to retirement or due to termination of the employment contract) while 29 were recruited. We are proud to create a comfortable and pleasant working environment where people are valued, recognized and appreciated.

▶ Total new employee hires per age and gender		▶ 18-25	▶ 26-40	▶ 41-50	▶ 51+
Total new employee hires per age and gender	MEN	0	3	13	3
	WOMEN	0	9	1	0
	<b>TOTAL</b>	<b>0</b>	<b>12</b>	<b>14</b>	<b>3</b>
Total new employee hires per age and geographical area	ATTICA	3	13	0	0
	VIOTIA	0	5	0	0
	REST OF GREECE	1	6	1	0
	<b>TOTAL</b>	<b>4</b>	<b>24</b>	<b>1</b>	<b>0</b>

### ▶ Total new hires by age and gender

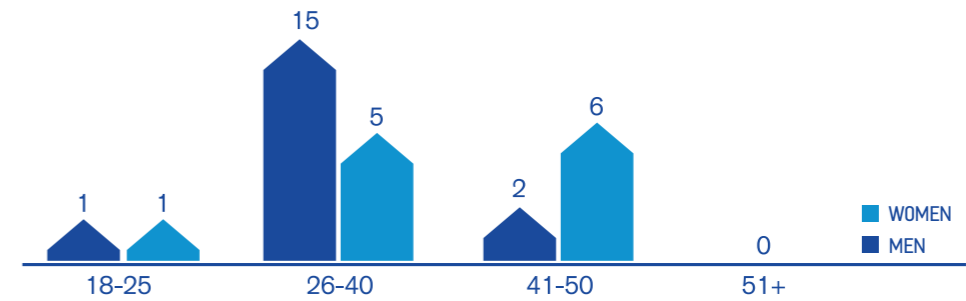


### ▶ Total new hires by age and geographical area

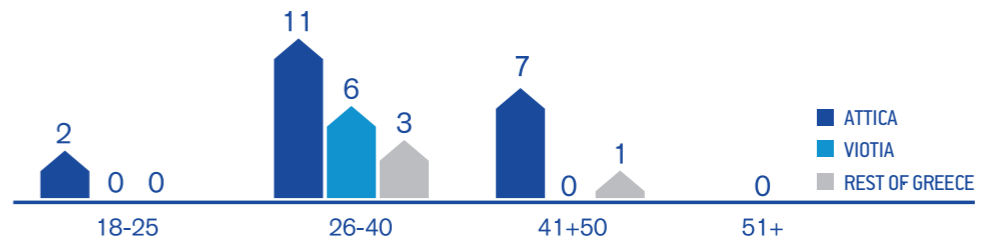


▶ Total employee turnover		▶ 18-25	▶ 26-40	▶ 41-50	▶ 51+
Total employee turnover per age and gender	MEN	1	15	2	0
	WOMEN	1	5	6	0
	<b>TOTAL</b>	<b>2</b>	<b>20</b>	<b>8</b>	<b>0</b>
Total employee turnover per age and geographical	ATTICA	2	11	7	0
	VIOTIA	0	6	0	0
	REST OF GREECE	0	3	1	0
	<b>TOTAL</b>	<b>2</b>	<b>20</b>	<b>8</b>	<b>0</b>

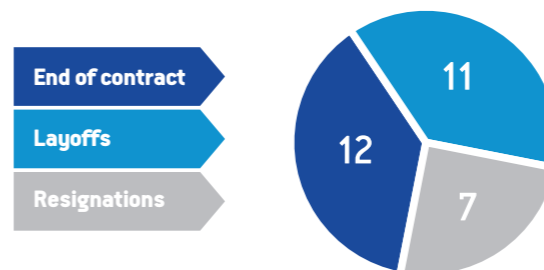
### ▶ Employee turnover by age and gender



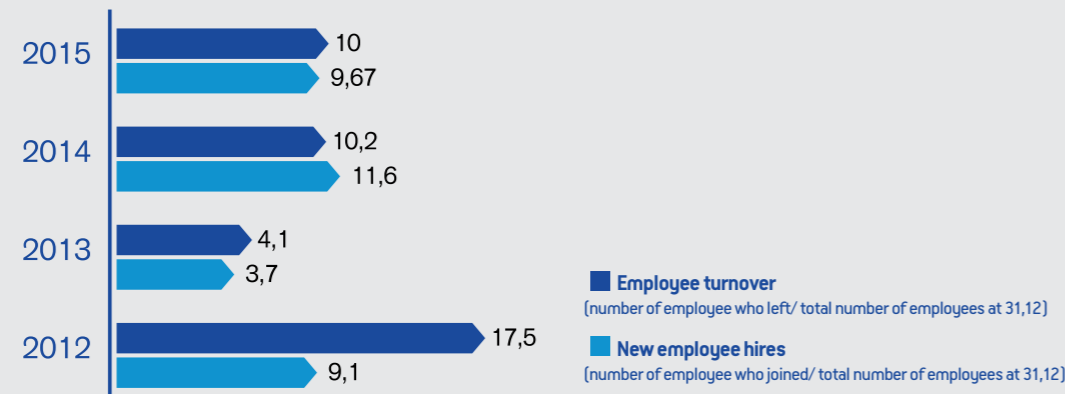
### ▶ Employee turnover by age and geographical area



### ▶ Employee turnover



### Employee mobility rates



### Equal opportunities

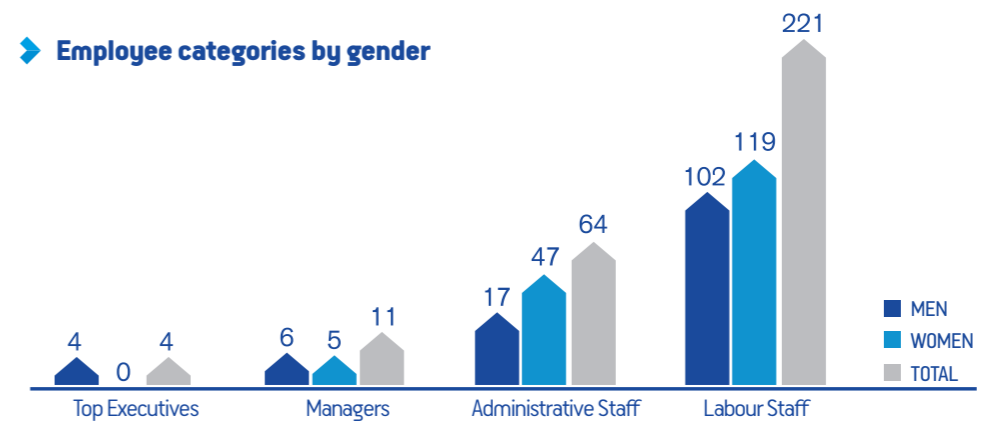
At Nea Odos our **equal opportunities** policy applies to everyone across the board and **no discrimination at any basis is permitted**. Respect for diversity and the human value is fundamental to our corporate culture. Gender equality and a balanced gender representation apply to the entire company and remain our targets. We can now demonstrate that women employees at Nea Odos outnumber men.

There is no discrimination on the basis of gender or other criteria not directly linked to performance. On the contrary, Nea Odos seeks to foster a workplace that offers development opportunities to those who are aligned with the principles of the company and seek to improve their knowledge, skills and performance.

The recruitment and employee evaluations are based on merit and conform to the formal corporate procedures. There is no discrimination of any kind in the employees' compensation, as we ensure equal pay for equal work and work of equal value. The company offers competitive compensation packages which are higher compared to the minimum salary threshold as defined by the Collective Bargaining Agreements.

During 2015 **no incident of discrimination occurred**, and **there were no grievances or complaints by employees** and/ or third parties regarding discrimination in the workplace.

### Employee categories by gender



**Analyzing the representation rates of women in positions of responsibility, it is evident that women hold more posts under "Administrative staff" and "Labour Staff" (73% and 54% respectively). The percentage of women "Executives" is 45% (5 out of 11 employees are women) while no senior executive is woman.**

We aim to secure for our employees a positive work-life balance. Our company encourages employees to keep work and personal life in balance so that work does not put a burden on their personal and family life. We acknowledge our employees' efforts and we show our concern by supporting them and their families whenever possible.

### Benefits

Nea Odos offers a range of additional benefits to its employees, beyond the minimum statutory benefits required by law. **It provides to all employees group private medical care insurance.**

As a proof of acknowledging employees' contribution, Nea Odos offers additional benefits which include cell phone, car, productivity bonuses based on the employee position.

The company covers the social insurance contributions for each employee in accordance with the law whereas employees receive upon retirement their pension from the Greek government. The company does not offer any additional private pension plan.

### Parental leave

At Nea Odos we to offer our employees a balance between work and family. In 2015, 6 female employees requested and received maternal leave, while it is worth noting that, according to our data, 100% of the staff who returned to work after their parental leave ended is still employed by the company 18 months after their return to work.

## Employee survey

At Nea Odos we cultivate and promote open and honest communication between the company and the employees in order to build a culture of mutual trust and understanding.

Aiming at recording the opinion of all employees, the human resources department initiated in 2012 an employee commitment and satisfaction survey. The survey is conducted every 18 months and is addressed to all company employees while the results are presented both to the management and the employees. In this way the company management will consider any improvement that may be needed and the employees can access the results for transparency reasons. The employee survey is a valuable tool which allows us to confirm or revise our decisions, but mainly to identify the strengths and the areas we need to develop further at company and employee level.

The survey included a structured questionnaire with the following sections: quality of work environment, quality and customer service, performance management, training and development, working conditions and working environment, work structure and resources.

300 employees participated in 2015 while the participation rate reached 89%. Key results:

### OVERALL RESULTS



The results of the survey, contribute to goal and objective setting, and also verify the investment, continuous support and effort Nea Odos is putting into improving its human capital.

The research is based on international methodologies with the support of an external independent consultant. This enables us to achieve a reliable analysis while it also allows us to benchmark our results against similar international indices.



## Employee Development

At Nea Odos, we offer to all our staff training and development opportunities, as well as excel and make their professional vision come true. We invest and aim at creating an excellent working environment where emphasis is placed on the safety of the employees and the recognition of their talents.

In 2015 we made the strategic decision to implement the internationally recognized methodology of development centers. This methodology is considered the most accurate and objective assessment method for staffing of key positions and predicting work performance. It is expected to improve the overall operation of the human resources department, and particularly the recruitment, promotion, training and staff evaluations.

## Development Centers

The methodology of development centers is widespread and considered as the most reliable methodology for identifying the behaviors required for the success of any role. It is considered as the most appropriate method for reducing time and evaluation cost of candidates and employees. It enhances staffing procedures, succession planning in critical roles and the creation of individual development plans within the company.

The objective of the Nea Odos is to identify and outline the strengths and areas of improvement for each employee, to complete the outline of his/her profile in order to design a personalized and efficient development plan.

Based on the above, during the last quarter of 2015 we started mapping the strengths and areas for improvement of all the group leaders /managers of the motorway. Within 2016, 25 more group leaders /managers will take part in this process with the aim to examine their talents and prospects. Upon completion of the above program, the company will deploy the methodology in order to improve other roles.

The human resources director and the head of staffing development were trained and certified as assessors/ observers in order to design, adapt and carry out the entire program based on the needs of the participants and the company.

*The procedures of the development centre (duration of 8 hours) include the following:*

- **Personality Questionnaire**
- **Structured Interview**  
(interview totally focused on the requirements of the participants' role within the company)
- **Individual Written Exercise**
- **Team Exercise**
- **Role Simulation**

Upon completion of each development centre each participant receives feedback on his/her results, in order to gain greater self-awareness, necessary for further improvement and development. The results are confidential and are managed by the evaluators/ observers with discretion for the sole purpose of highlighting the strengths and the areas for improvement of the participants.

As it is understood, the methodology of development centers is an ongoing process for Nea Odos aiming at ensuring the professional qualities required for each role, in order to meet the long-term recruiting needs and achieve the strategic goals of the company. Our goal is to apply the methodology in all levels of the organization, to strengthen our structure and establish a reliable and widely accepted fair evaluation method.

## Employee Training

Given the rapid progress of the construction projects and in view of the upcoming staffing needs for the motorway's new sections that will be opened to traffic, training of the employees is one of our strategic priorities. The learning and development policy we follow consists of six distinct stages (Analysis - Identification - Development - Implementation - Evaluation - Efficiency Rating) and is applicable to all employees at all levels.

The aim is:

- i. **To support corporate strategy**
- ii. **To prepare employees for their professional career within the company**
- iii. **To equip employees with the necessary tools and skills in order to perform their daily tasks in the most efficient manner**

The total hours of training offered in 2015 reached 2.962,5. A total 145 employees took part in the 32 training courses that were offered (internally, externally and e-learning) during the year.



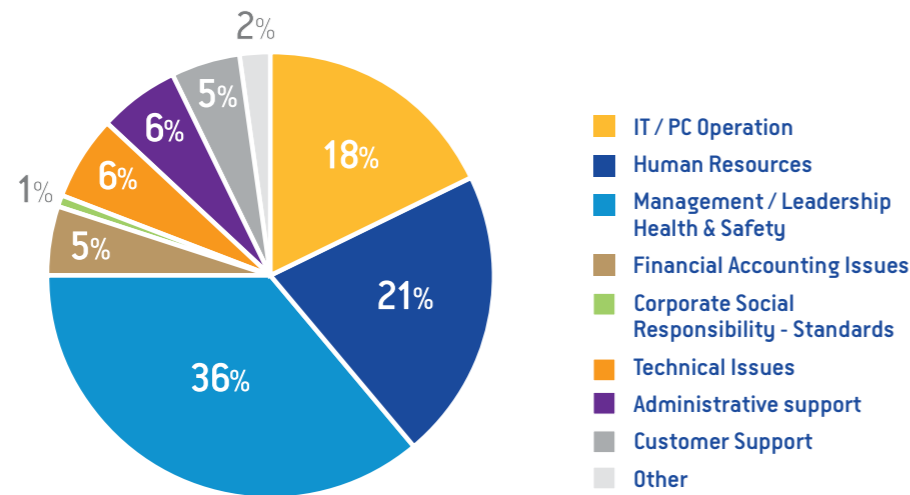
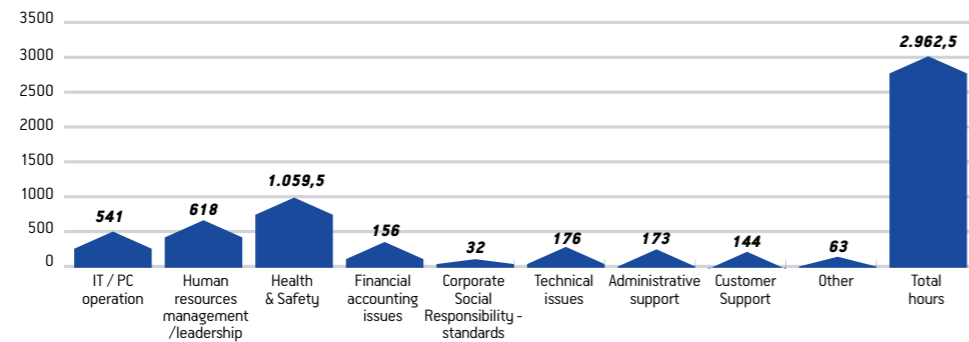
### ▶ Training data per employee category and gender

Training data per employee category and gender	Total training hours			Average training hours/ category		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Top executives	0	0	0	0	0	0
Managers	259	157	416	43,2	31,4	37,8
Administrative staff	809	873,5	1.682,5	47,6	18,6	26,3
Labour staff	746	118	864	7,3	1	3,9
<b>Total</b>	<b>1.814</b>	<b>1.148,5</b>	<b>2.962,5</b>	<b>14,1</b>	<b>6,7</b>	<b>9,9</b>

In 2015, we included customer service training in our training programs portfolio in order to improve the experience of our customers.

At Nea Odos we systematically support 3-month and 6-month internship programs through Educational Institutions, in order to prepare recent graduates for the labour market. Since 2012 we have placed 5 students in the departments of Quality, Safety and Environment and in the department of Intelligent and Electromechanical Systems. Apart from that, we have hired one student following his internship completion.

► **Distribution of training hours per topic**



Official awareness or training sessions for employees (including security personnel) on human rights issues corruption or corporate governance issues are not yet included in our training curriculum.

## Employees Performance Management

Our annual performance management process offers employees the opportunity to analyze and assess the achievements of the previous year, and to set clear objectives for the near future. With the introduction of the development centers' methodology, the performance management process becomes more valuable as it takes into account the overall career development path of the employees.

In 2015 we completed the employee performance evaluation of the year 2014. Eligible employees are considered those who have completed 8 months of working with the company and during the evaluation period were not on a long term leave (pregnancy, maternity, sick, etc.). 99% of men and 82% of women participated in the performance evaluation exercise. All participants have access to the evaluation results.

### Employee evaluation



## Health and Safety at the Workplace

Our people are our most valuable asset, therefore ensuring their health and safety is a non-negotiable priority. The policies and procedures we follow as well as the high standards we have set, aim at effectively strengthening our strategic plan for health and safety for all our employees.

The protection of employees' health and safety is closely intertwined with Responsible Business and the Principle of Respecting and Protecting Human Life. According to this principle, we have taken on the commitment to comply with a Health and Safety system that emphasizes on the protection of health and prevention of harm, and fully safeguards the employees and the company from the consequences of undesirable incidents.

Within this context, we manage Health and Safety issues in accordance with the provisions as set out by the current Greek and European legislation. Since 2013, Nea Odos implements a Health and Safety management system, certified according to the requirements of International Standard **OHSAS 18001: 2007**.



In order to make the strategic Health and Safety plan succeed and to enhance the established management system, we place particular emphasis on the education and development of the human resources employees. At Nea Odos we aspire to cultivate a culture of Health and Safety and work systematically in order to achieve it. All employees receive the necessary training on Health and Safety issues in accordance with the job and risk as defined by the relevant Occupational Risk Assessment Study.



With the support of independent consultants on Health and Safety issues, Nea Odos offers all the necessary support through Safety Technicians and Occupational Doctors, thus ensuring the continuous monitoring of the health and work conditions of all the employees.

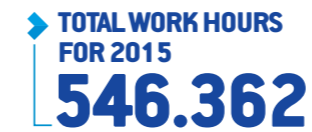
In order to protect employees and prevent any kind of occupational hazard, both the Security Technicians and the Occupational Doctors make regular visits to all facilities of our company. During these visits they assess the current situation, indicate the areas that need improvement, while at the same time they inform, guide and provide employees with safe working instructions.

It is worth noting that Nea Odos exhibits particular care about our employees' health. Therefore in cases of serious medical problems related to the employees themselves and their families, the company acts at once. Such actions may include psychological empowerment by certified psychologists and therapists, specialized medical monitoring, the purchase of specialized medical equipment for the patient's treatment or recovery as well as the provision of financial support and paid leave during illness or recovery.

Moreover, Nea Odos offers to all employees free Medical Exams based on the job position and risk category as defined in the Occupational Risk Assessment Study. We provide an annual free check-up to all employees and we have the maintenance department employees vaccinated against tetanus, Hepatitis A and B.

Health and Safety Indices	2012	2013	2014	2015
Injury or accident rate of total staff (%)	1,52%	1,53%	0,85%	3,67%
Hours of absence/ total work hours (%)	0,03%	0,33%	0,06%	0,42%
Accident frequency indicator	7,64	8,18	4,76	20,13
Accident severity indicator	50,43	505,52	88,76	636,94
Number of fatal accidents	0	0	0	0
Lost work days due to accident	33	309	56	348
Incidents without days of absence	1	1	0	4
Injury rate (IR)	1,53	1,64	0,95	4,03
Lost Day Rate (LDR)	10,09	101,10	17,75	849,68
Absence rate (AR)	67,55	662,90	118,56	127,39
Total work accidents	5	5	3	13
Work accidents with days of absence from work	3	4	3	9

Work related accident under the Health and Safety system is defined as: The incident that evolved into an injury, illness or death. Any violent incident occurring in the course of work (or transport to and from work as defined by law), which results in temporary or permanent incapacity for work.



Ensuring the Health and Safety of all employees, is for us an enduring goal, commitment and decisive factor of effective operation. Creating a safe and healthy working environment where no accidents or injuries occur, is our daily concern.

In order to ensure health and safety for all employees and achieve effective monitoring of relevant issues, a Health and Safety Committee was formed. This committee represents more than 75% of the employees and consists of:

- Head of Traffic Management
- Winter Maintenance and Equipment Engineer
- Head of Toll Collection
- Security Officer – Tunnels
- Technical Support Officer

The department heads communicate to the management of Nea Odos information and data relating to Health and Safety issues and at the same time inform the employees about the direction and management decisions.

**Health and safety issues covered by collective bargaining agreements include:**

- Personal protective equipment
- Committees on health and safety issues with participation of representatives of the management and employees
- Participation of employees' representatives in health and safety inspections in the audits and accidents' investigations
- Training and development
- Complaint filing mechanisms
- Right to refuse to perform unsafe work
- Periodic inspections
- Compliance with the International Labor Organization (ILO)
- Arrangements or issue resolution committees
- Commitments on performance objectives or level of practice standards

Within the scope of the Health and Safety Management System, the company seeks to minimize or eliminate risks for the sake of its employees, the motorway users and any third parties affected by its business activity.

# Caring for the environment

8

We acknowledge the great environmental responsibility that derives from our business activity. For this reason we commit to responding to the social demands for the environment. Constructing, operating and maintaining highways fully integrated with the natural environment, protecting biodiversity and highlighting the natural resources of each region are part of our social role and one of our goals.

We have proceeded to analyzing and identifying potential environmental impacts and we now focus on minimizing negative effects and eliminating any damage that may occur. Continuously enhancing our employees' and partners' environmental awareness is part of our objectives and a key value of our corporate culture.

Nea Odos implements a comprehensive environmental monitoring program which includes:

- Internal Inspections plan to verify that the Approved Environmental Terms are met
- Audits and compilation of checklists related to the implementation of the Approved Environmental Terms
- Environmental risk assessment and appropriate risk management planning in order to achieve continuous improvement
- Full compliance with the environmental legislation in every section of the motorway that is currently in operation
- Implementation of an annual plan to monitor road traffic noise
- Implementation of an annual program to assess air quality through the installed measurement stations
- Regular briefing of all employees about environmental management issues
- Suggestions, announcements and guidelines through specialised reports
- Annual and semi-annual compliance report of the Approved Environmental Terms and other contractual obligations related to environmental protection

## Our goal

**Constructing, operating and maintaining motorways fully integrated with the natural environment, protecting biodiversity and highlighting the natural resources of each region are part of our social role and one of our goals.**

## Environmental Management System

Effective monitoring, analysis and mapping of our environmental performance is achieved also through the implementation of the Environmental Management System. In 2015 the Environmental Management System of Nea Odos was certified by an international accredited body according to the requirements defined by the international standard ISO 14001: 2004

Under the Environmental Management System we have implemented:

- **Monitoring of our compliance with Environmental Legislation**
- **Monthly audits plan regarding the compliance with environmental terms**
- **Environmental objectives' monitoring program**
- **Recycling program (equipment, bulbs, batteries, paper)**
- **Analysis of environmental aspects and implications**
- **Materials and waste management program**

## Fuels

For the operational needs of Nea Odos, fuels are consumed mainly by the car fleet. In 2015 the company undertook a series of actions in order to improve the efficient fuel use. These actions include:

- The renewal of its vehicles fleet and shifting its fleet from petrol to diesel
- Awareness and training campaigns addressed to drivers regarding the benefits of environmentally friendly driving

Fuel consumption (lt)	2013	2014	2015
Diesel (fleet)	184.629	309.254	298.737
Diesel (generators)	-	4.000	7.590
Gasoline	57.876	22.736	150

Conversion factors:: Diesel: 36,4 MJ/Lt, Gasoline: 44 MJ/ Lt

our corporate fleet travelled  
**2.194.925 Km**

our patrols travelled  
**1.960.528 Km**

## Energy

Electricity is the main source of energy consumed to meet the heating need of company buildings and facilities. During 2015 the company redesigned the building located in Varibobi according to bioclimatic architecture principles and renewable energy standards.

Energy Consumption (buildings, toll stations, road lighting etc)	2014	2015
Electrical energy for street lighting and buildings	16.906.849	15.945.961
Solar energy for Emergency Telephones (ERT)	876	1576,8

41.963,056Kw  
Electrical Energy / road km

0,357Lt  
Fuel/patrol km

Due to their nature, the services offered by Nea Odos do not consume energy.

The increase in the solar energy consumption for Emergency Telephones is due to the increase in the number of telephone booths from 100 in 2014 to 180 in 2015. Since there is no measuring device installed, energy consumption is measured based on manufacturer's official guidelines and the average annual duration of sunshine.

## Use of materials and supplies

Nea Odos is under an obligation to respect the Approved Environmental Terms of the Concession Project regarding the preservation, protection and conservation of natural resources. The materials and raw materials required for the operation and maintenance of the motorways, form part of our partners and subcontractors' responsibilities, who must comply with the approved material specifications for the construction project. Nea Odos is responsible for relatively small quantities or raw materials, which are presented in the table below.

Categories	Material	Quantity	
		Partners & subcontractors	Nea Odos
Raw materials (kg)	Salt	6.503.700,00	-
	Sawdust	2.794	-
	Printing paper	24.000	301
Associate processes materials (lt)	Cleaning materials (Items)	15	-
	Fuels (Gasoline) (lt)	65.295	150
	Fuels (Diesel) (lt)	336.904	298.737
	Fuels (Natural Gas) (lt)	840	-
	Water consumption (Buildings and Facilities) (lt)	300	-
	Water (for washing - EYDAP) (lt)	100.900	-
Semi-manufactured goods or parts	Spare parts (cables) (meters)	-	2.850
	Computers (Items)	-	50
	Lightbulbs (Items)	7	800
Materials for packaging purposes (m3)	Timber	-	9
Other (kg)	Cuts residues	450.000	-

## Natural resources, materials and waste management

The smooth and harmonious integration of the motorways into the natural environment has always been our ultimate goal. We make decisions driven primarily by environmental and social requirements of sustainability and sustainable development.

We analyze and monitor the potential environmental impacts of the motorway operation and maintenance in order to minimize the negative impacts and eliminate any damage to the environment. The amount of our waste is limited due to the nature of our business activities.

As regards the operation and maintenance activities of the motorway, Nea Odos compiles an annual waste management report in accordance with the relevant legislation. The report lists the quantities of waste, the transportation methods to the approved Alternative Waste Management System As well as information regarding waste disposal through licensed partners

Waste category	Type	Quantity	
		Partners & subcontractors	Nea Odos
Raw materials (barriers, signs)	Iron and steel (Kg)	75.958	-
	Plastic (Kg)	473	-
Semi-manufactured goods or parts	Plastic (Kg)	10.650	-
	Batteries (Kg)	-	620
Other	Animal tissue waste (Road Kill) (Kg)	2.080	-
	Mixed municipal waste (Kg)	134.589	-
	Engine gear box and lubrication oils (Lt)	3.830	-

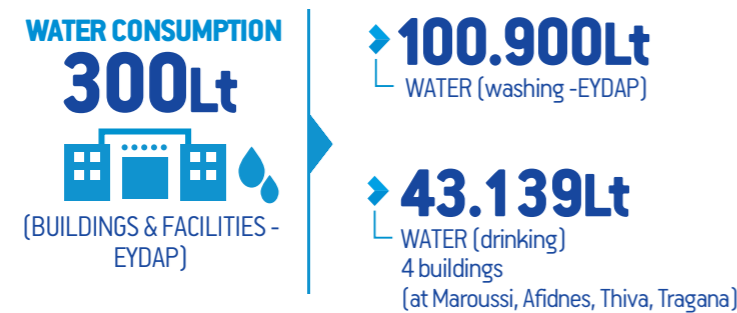
Nea Odos does not import, export or process hazardous waste. According to its operating procedures, Nea Odos does not discharge water into water bodies. During 2015 no leaks have been observed.

## Water management

Nea Odos takes all precautionary measures aiming at efficient water management across its premises and business activities.

Namelly, the company:

- Collaborates with a certified Environmental Management System (ISO 14001: 2004) subcontractor, for the planting and maintenance of greenery in the facilities along the highway
- Uses optimal water saving irrigation system of plantings within the boundaries of the Concession Project
- Abides by the Concession Agreement, the approved environmental terms and the applicable legislation



## Air Pollution management

According to our Environmental Policy our primary objective is to continuously improve our environmental performance. Monitoring the air pollution is a requirement of both the concession contract and the relevant studies on the environmental impacts. In this way the project is examined as a potential source of air pollution. In case it is found to be such a source, its contribution to the air pollution is additionally examined. Gases are emitted due to the combustion of fossil fuels required for the motorway travel needs of our vehicles.

We continuously monitor the air pollution levels caused by the motorway operation, as it forms part of our standard environmental procedures and is in compliance with the European strategy for air pollution recording and the approved environmental terms.

To monitor the air pollution generated by the operation of the motorway, the company has installed three air quality assessment stations in Varibobi, Schimatari and Arkitsa. Measurement of pollutants is recorded on a continuous basis throughout the day.

According to legislation, the recording system installed in each station is connected with the relevant devices that record potential exceedance of pollution limits in relation to values of CO, NO, NO2, SO2, O3, PM10, PM2.5, C6H6, C7H8 and xylene (or xylene).

Average annual values 2015	Arkitsa	Schimatari	Varibobi
NO2	32	29	38
C6H6 (Benzene)	0,42	0,64	0,92
Suspended Particles AΣ10 (Average annual price in mg/m3)	18,2	21,7	16,1
Suspended Particles AΣ2,5 (Average annual price in mg/m3)	13,1	15,3	10,8



These stations have been in operation since 2012. The company applies annual air pollution monitoring programs in collaboration with the Civil Engineering department of Thessaly University and submits its annual Atmospheric Pollution reports to the relevant public services.

A single case of limit value exceeding pollution limits was recorded at Varibobi station. This station is significantly influenced by local traffic to and from Kifissia (collateral network) and the recorded value exceeding pollution limits was caused by the congestion of the collateral network at the moment of measurement.

Our six-month progress reports on the implementation of the environmental terms during operation and maintenance of the project are available on the company website.

## Noise Management

The construction and operation of a motorway inevitably generates noise. Nea Odos has taken precautions to minimize any disturbance in the areas our motorways pass through. This way we ensure residents' quality of life and at the same time respect the permitted traffic noise limits as defined by law. Within this context, we have established an Annual Road Traffic Noise Monitoring Program in order to measure noise at sensitive locations approved by the competent public agency along the highway.

According to the results of the program, or following complains for excess noise, further sound measurements are carried out, appropriate protection measures are applied and corrective actions are taken wherever necessary.

## Protection of Biodiversity

The original design of the Concession Project was based on the main Environmental Impact Studies on the layout and alignment of the motorway. At that stage the biodiversity of each transit area was examined, the environmental terms for its protection were set and the necessary measures for its protection were identified.

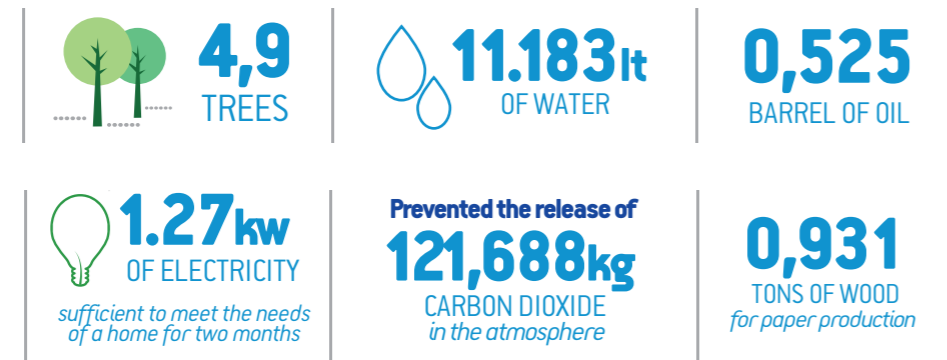
Thus, there are wildlife crossings constructed in habitat areas, motorway fencing along the motorway to deter entry and passing of wildlife, closed sewage systems for the protection of sensitive areas (i.e. Yliki lake and surrounding environmental habitats, natural resources), planting and preserving indigenous species, harmonization of the project with the natural environment, construction of pollutant retention tanks, implementation of action plans to prevent accidental pollution, implementation of noise prevention measures, design of pilot programs for the recording and monitoring of microflora development.

The Messolonghi-Aitolikou wetlands, the Ozeros lake, the Achelous river, the Arachthos river, the Louros river, Lakes Yliki and Paralimni – Boiotikos Kifissos System" the "Wetland and islands of Atalante bay", " Kato Rous and estuaries of Sperchios River" are included in the **Natura 2000 Network**, constitute broad areas where the concession project shares a border with or passes through.

## Recycling

In 2015 we implemented a pilot recycling system at our headquarters. We collected and recycled 301 kilos of paper, plastic and high quality aluminum and prevented recyclable materials from being diverted to landfills and polluting the environment and groundwater.

According to data received from the recycling company, we saved:



Nea Odos has signed agreements with Alternative Management System recycling companies for paper, plastic, batteries, used electrical and electronic equipment. Regarding paper, our corporate practice is to use environmentally friendly printing paper which is sourced from sustainably managed and certified forests. The printing paper that we use meets international certification standards, therefore allowing us to actively contribute to reducing our environmental impact.

Environment Protection and Health and Safety	€
Maintenance of the company building's fire safety system (Sorou 13)	149,10
Environmental Studies (MPE, TEPEM, Recycling Studies EPO, Environmental Licensing of Escorting projects and activities, etc.)	32.000
Motorway Health and Safety Monitoring Program	12.300
Occupational Health Protection and Prevention Service for Security Officers & Occupational Doctors (HR Department Responsibility)	6.445,50
Protection and maintenance of green spaces	650.000
Traffic Noise Monitoring Program	36.000
Environmental consultants Staff monitor the application of Environmental Terms.	45.000
Air Pollution Plants Operation and Meteorological data and Gas Pollution monitoring	53.000
Certifications ISO 39001:2012	2.750
Certifications OHSAS 18001 / ISO 9001:2008 / ISO 14001:2004	1.733
<b>TOTAL</b>	<b>839.377,6</b>

In 2015 the company ran a workshop on safe driving and energy saving where participants:

- Developed their knowledge on basic practical and economical driving taking advantage of the engine's "ideal" operating range and the traffic conditions in order to minimize fuel consumption and emission of pollutants into the environment.
- Participated in practical exercises of economical driving routes based on simulations of different traffic conditions (i.e. uphill - downhill, closed and open curves, forced postures, constant velocity path etc.) in order to become aware of more modern, efficient and smart driving that helps us to protect the environment.

## Cooperation with Local Communities and Social Contribution

### Our positive Contribution to Social Development

Nea Odos was founded in 2008 and since then it has been growing in a responsible manner and at the same time has been actively supporting the Greek economy. Through its business activities it actively contributes to the development of the country and local communities.

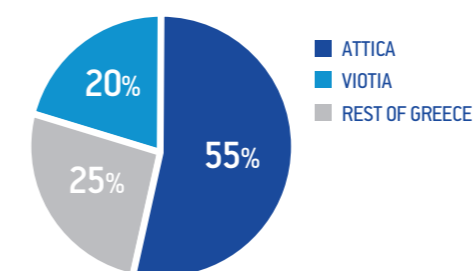


Annual contribution to social development - "Social Product" (in thousand euro)	2015	2014
Payments to suppliers (except materials and intercompany transactions)	27.661,34	46.125,87
Employee salaries and benefits (including insurance contributions)	7.648,36	6.162,73
Payments to providers of capital	6.984,83	6.331,45
Company investments	259.709,19	229.521,68
<b>TOTAL</b>	<b>302.003,72</b>	<b>288.141,73</b>

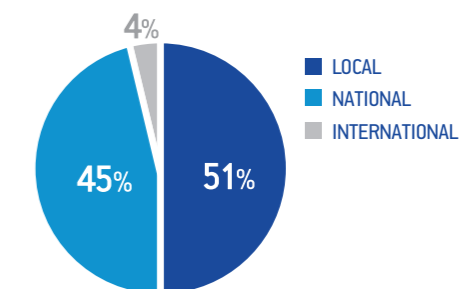
Nea Odos constitutes an integral part of the Greek society and contributes substantially in strengthening the Greek economy. With our services we ensure safety and speed in both the travel of people and the transfer of goods and services. This way our company contributes to prosperity and sustainable development.

We act as a responsible corporate citizen, therefore we consciously strive to make a positive impact on society. Particular emphasis is placed on the local communities with which we continually interact, in order to identify local needs and support individuals in any way we can, mainly through direct and indirect employment opportunities that we offer.

#### Employees by geographical area



#### Suppliers Distribution



## Pricing Policy

### for Permanent Residents and Frequent Users



Going one step further, we recognize the need of the Oropos' wider area permanent residents for daily passes from the section Athens-Lamia. We have therefore developed the Fast Pass Oropos discount program. This program is for Nea Odos an annual investment amounting to **€279.908,40**.



Similarly, we designed the **Fast Pass Frequent** program aimed at all frequent users of the Metamorphosi - Oinofyta section. It offers significant discounts up to 50% to the frequent users. The Fast Pass Frequent program constitutes an **annual investment of €248.410,83**.

## Welfare and Social Solidarity Actions

The economic circumstances have significantly affected vulnerable social groups and therefore the need to take initiatives focusing on social welfare activities has increased dramatically. At Nea Odos, through our well designed Corporate Social Responsibility program we respond to social needs. In our efforts we have the full support and assistance of the company's employees and motorway's users. We choose carefully our initiatives and the people/ organizations with whom we collaborate to ensure successful implementation. Examples of our actions include:

**Fundraising:** Our employees organized a fundraising activity, and collected 20 boxes of high priority items (food, toys, clothes) that were offered to the association "Together for Children". The association distributed part of the items to the Association of "Caritas", as well as to the Kindergarten and Elementary school of Volakas in Drama. Athens Caritas is a member of the International Non-Government Organization "Caritas", which operates in more than 200 countries. It is a recognized non-profit Association, with a view, among others, to providing food, clothing and social support to people in need.

**Sponsorship to the "Observatory of Road Axes Western Greece and Peloponnese" of the University of Patra:** In 2015, Nea Odos, in collaboration with Olympia Odos, Moreas and Gefyra SA proceeded to a joint sponsorship of the civil non-profit company "Observatory of Road Axes Western Greece and Peloponnese". The sponsorship amounted to € 48,000 (€ 16,000 each). This initiative aims at supporting the systematic monitoring, recording and evaluation of the above road network as regards its financial, social, developmental, planning, transportation and environmental impacts. These impacts concern Rio-Antirio Bridge in southern and western Greece, Peloponnese as well as the areas where these roads extend to or terminate.

**Support to NGO "DIAZOMA":** Nea Odos supported the mission of DIAZOMA for the promotion of ancient theatres with the amount of € 13.000. The purpose of the sponsorship is to conduct a study for the development of a "cultural route" which will connect the Ionian Motorway with the ancient monuments located in areas that the motorway passes through

**Donation of Medals:** Nea Odos donated 230 commemorative prizes (medals) to the Association Kastro Viotia, for the needs of the 5th marathon race of 10 km entitled "2015 KOPAIA". The value of the offer was €396

**Financial Donations :** To the Family Education and Child Care Training Centre (KEMOP) "PLATON" in Naupaktos with € 750 direct financial donation. An additional € 1.050 donation came from battery recycling cashback. In response to the refugee crisis, at Christmas we supported the Greek Council for Refugees with € 1.500

**Sponsorship to Traffic police stations:** Christmas sponsorships and in kind donations to the local Traffic police stations by our employees

**SMS donation mechanism:** To "The Smile of the Child", on leaflets to enable users to assist the organization's work

**Donation of PC:** A fully equipped computer system (pc, monitor, mouse, keyboard) to the Motorway Traffic Police Station in Fthiotida

**Donation of patrol vehicles:** 5 old patrol SCODA brand OCTAVIA TFSI 1.8 type vehicles were donated to the Motorway traffic police department B and additional 5 to the Motorway traffic police in Viotia to support their work

**Money Boxes - anonymous donations:** Money Boxes - anonymous donations to the "Smile of the Child" from motorway users at service points, amounting to € 185,42

**Building maintenance & equipment:** We supported the branches of NGO " Smile of the Child " in Agrinio and Halkida in order to meet building and equipment needs of shelter facilities offering each € 1.500.

**Offer of visual material:** We supported the Elementary school in Volaka with donation of training related equipment

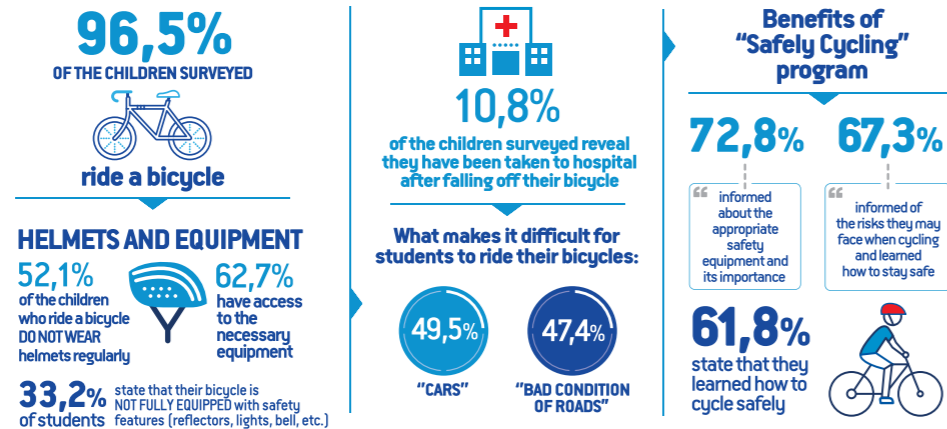
## Education actions

The company recognizes the need for training in various areas and for people at different age groups. For this purpose it supports the following initiatives through its Corporate Social Responsibility program:

- **Educational programs:** In 2015 it supported educational programs for children with pervasive developmental disorders, disabilities. It also supported other programs of ELEPAP (Rehabilitation for the Disabled), offering monetary donations to the NGO branches in Agrinio and Halkida, amounting each to € 1,500.
- **Action "Safely Cycling":** In cooperation with the Institute for Road Safety (IOAS) Panos Mylonas (I.O.A.S) we implemented training activities for 54 schools at regions from which PATHE motorway project passes through. Overall, 2014 elementary students were informed and trained on road safety. Their bicycle was employed for this purpose! "Safely Cycling" is a program approved by the The Ministry of Education, Research and Religious Affairs and the Institute of Educational Policy. Our total investment in this activity reached € 11.180 and it is expected to have long-term positive effect children that participated.

► **“Safely cycling” survey results:**

Alongside the training, we conducted a survey, which revealed the extent of the road safety issue



○ **Action “HERMES”:**

An educational program aimed at young offenders of traffic regulations that took place at the Youth and Juvenile Prison at Avlona, Municipality of Oropos. In collaboration with I.O.AS 25 young people who had violated, traffic regulations were trained on road safety.



The Paralympian swimmer Mr. Yiannis Kostakis, joined our training event and shared his personal experience, since a road accident was the cause of his disability. Our total investment for this activity amounted to €1.500



## Environmental Awareness

In 2015 we undertook initiatives to raise public awareness on environment issues, and support our company’s priorities in relation to environmental protection.

○ **Distribution of brochures for forest fires:**

In collaboration with the General Secretariat for Civil Protection, during the summer anti-fire season, we distributed at all our tollbooths, brochures with tips on fire prevention, as well as instructions on how to address a fire incident.

○ **Distribution of biodegradable bags:**

In collaboration with the TV and radio station SKAI we distributed 60.000 biodegradable bags to drivers. The initiative which was part of the campaign “All Together we can- for the environment” took place during Easter holidays and summer. It aimed at enabling drivers to collect the trash they accumulate during their journey and dispose of it at their final destination.

## In Kind Donations

True to our strategy to support people with special needs (disabled), we met the demands for free passage, we granted 72.952 free passes in 2015, an investment of € 202.905,41



Permanent entrance passes were granted to a variety of purposes that proven serve disabled people, vulnerable groups or charitable purposes such as the:

- Italian and Croatian mission that participated in Readiness Exercise of Policy protection PROMITHEUS 2015
- Group of cyclists of the Cancer Patients Athens Association “K.E.F.I.”
- Mixed centre of day care, employment and training “The Spring Kids”
- Roundtrip of the Disabled Athletic Association “THE ARGONAFTES”
- Mobile Educational Unit of I.O.AS
- Volunteer teachers for female prisons, second chance school, at Eleonas Thiva
- Experiential mobile education unit of I.O.AS for 2nd consecutive year

As regards our corporate communication policy, we comply with the highest standards and commit to communication and marketing ethics and beliefs consistent with the principles and values of our company. More specifically in all forms of commercial and social communication we abide by the professional code of conduct as defined by the Greek Code of Advertising-Communication, of the Communication Control Council (CCC).

### REDUCTION OF THE AVERAGE TRIP TIME

**ATHENS-SKARFIA**  
from **2:00h** to **1:15h**

**ANTIRIO-GIANNENA**  
from **3:30h** to **1:40h**

**SOCIO-ECONOMIC BENEFIT**  
(trip time saving and vehicle cost)  
**€ 3.750.000**  
(prices 2006)

### ROAD SAFETY

ACCIDENTS RATES

**5**

TIMES LOWER

FATAL ACCIDENTS

reduced up to

**65%**

**SOCIO-ECONOMIC BENEFIT**  
(prices 2006)  
**€ 575.509.125**  
(prices 2006)

### CONTRIBUTION TO EMPLOYMENT



**241** JOBS  
every year for the next 30 years

**SOCIO-ECONOMIC BENEFIT**  
(prices 2006)  
**€ 3.361.542,416**  
(prices 2006)

# Goals for 2016

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## ▶ Road Safety-Quality Services

Topic	Goals 2016
Traffic monitoring	19 new cameras along PATHE motorway
Installation of additional equipment	The studies for the installation of additional equipment concluded in 2015. Installation is planned for 2016
Variable Message Signs	Install 4 new signs in 2016
Weight Measurement in Motion	Develop an extended network of Weight Measurement in Motion
Customer satisfaction survey	Improvement/retention of rankings

## ▶ Human Resources

Topic	Goals 2016
Development Centres	14 additional Team leaders to take part in the process
Performance management system	Performance management system improvement according to the development centres methodology
Road Safety	Train all employees on safe driving issues
Stray animals	Train and certify all road safety patrol units on collecting and managing stray animals

## ▶ Caring for the Environment

Topic	Goals 2016
Monthly audit plan for compliance with Environmental Terms	>12
Monthly audit plan for Health & Safety during operation and maintenance activities	>12
Identification and assessment of environmental impacts Process	Improvement and update of the Environmental impact recording system
Environmental Risk management Process	Process Improvement and update
Natural resources, material, and waste management Process	Process Improvement and update
Motorway Operation and maintenance	Maintain zero environmental fines
Employee training	Conduct at least 150 training hours on Health&Safety aimed at middle and high ranks Conduct at least 40 training hours on Environmental issues aimed at middle and high ranks
Measure low frequencies electromagnetic radiation at company premises	Project Assignment and completion within 2016
Measure of CO <sub>2</sub> emissions (office)	The tender was completed in 2015. The 1st CO <sub>2</sub> emissions measurement to be completed in 2016

## ▶ Cooperation with local communities and Social contribution

Topic	Goals 2016
Recycling	Pilot recycling program at toll stations
In kind donations	Audiometer supplies for Universities and Educational institutions
Kilometres of SOLIDARITY	Establishment of the "Kilometres of SOLIDARITY" in partnership with Gefyra SA and Olympia Odos
Blood bank	Establish corporate blood bank with the support of employees and partners
Stakeholder engagement	Survey on Corporate responsibility aimed at motorway users
Participation to Global Initiatives	Member of GRI GOLD Community
Stray animals management System	Develop an integrated management system for stray animals entering the motorway in cooperation with the non profit organization "Elliniki Filozoiiki Etairia"



# Report profile

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Faithful to our commitment for transparency we present for the second consequent year, with facts and figures, the actions and the outcomes of our business activities.

This report constitutes a continuation of our first effort and aims at clearly reflecting the strategy of our company on issues related to Corporate Responsibility.

The 2015 Corporate Responsibility Report of Nea Odos covers all key and material aspects which Nea Odos has recognized and focuses on. The report refers to year 2015, from 01/01/2015 to 31/12/2015 while our first Report concerned 2014 from 1/1/2014 to 31/12/2014.

We continue to follow the principles and guidelines of the Global Reporting Initiative (GRI) and structure the Report and our approach in accordance with the instructions and directions provided by the standard. Our Report meets the requirements of the "in accordance" option Core and has been prepared in accordance with the GRI-G4 guidelines.

Data is based on five CSR pillars, covering the risks, opportunities and strategies for the future

- **Road Safety**
- **Quality of Services**
- **Human resources**
- **Caring for the Environment**
- **Work with local communities and Social Contribution**

In some cases we present data from previous years in order to provide in a more holistic way insights of our journey to Sustainability.

*It is useful to quote some clarifications:*

#### **Accidents**

The number of accidents excludes accidents involving seasonal employees who are directly employed by the company. We do not record data on absenteeism. Since 2015, the Injury Index (IR) is renamed Labor Accidents Index (IR)

#### **Suppliers**

Local suppliers do not relate exclusively to the maintenance and operation of the motorway. National suppliers include suppliers from related parties, most important of which is the manufacturer EUROIONIA. The remaining related suppliers focus on the maintenance and operation of the motorway (power supply, maintenance E/U installations, etc.). The amount of related parties was € 261,572,642 while international suppliers include some related parties amounting to €1,756,174.

#### **Financial data**

Salaries and employees' benefits include employer contributions. Payments to capital providers have been interpreted as interest payments to banks for loans taken and repaid. Payments to suppliers (other than materials and intercompany transactions) include all payments made to suppliers other than related parties (including VAT and withholding taxes). All other payments include consumables and services provision.

#### **Employees and training**

In the 2014 Report we presented the employee and trainee data which referred to Nea Odos and Kentriki Odos, in order to provide a more complete picture of the company and its operations. Since Kentriki Odos will publish a separate Corporate Responsibility Report in 2015, the information included in this report refers exclusively to Nea Odos.

For our 2015 Report we have not conducted external assurance as our first concern is to strengthen our internal structures and data collection mechanisms. This will enable us to meet our future target to develop an "in accordance" option comprehensive Sustainability report.

**|| We are very proud of our second Report as we can actively communicate our commitment to responsible business. The entire company contributed to the development of the report content.**

#### **CSR TEAM**

A number of executives from different Departments and Directorates of the company cooperated for the collection of data, in particular:

- **Material Moderators:** Fotini Lamprou, Gerasimos Monokrousos
- **Departments / Divisions' Representatives - material responsible:** Vaso Voulgaraki, Panagiotis Galanopoulos, Fotis Gonos, Vasiliki Zoulomitaki, Babis Daskalakis, Evangelos Kareklas, Nikos Katapodis, Fotini Lamprou, Natalia Manara, Giannis Marinopoulos, Gerasimos Monokrousos, Giannis Bouli-eris, Eleni Nianiou, Anastasia Pneumatikou, Eugenia Soufi, Panagiota Stasinou, Ioanna Tsakatoura

#### **SUPPORT**

The 2015 Corporate Responsibility Report was developed with the guidance and support of Sustainability Knowledge Group.

#### **CONTACT POINT**

Your opinion is essential for us, especially as it gives us the opportunity to improve. You can contact us for comments, opinions, questions or suggestions.

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# Annex A

## BOUNDARIES OF MATERIAL ISSUES

	Material issues of Corporate Responsibility	Boundary of issues		Stakeholder Groups											
		Inside N.O	Outside N.O	EMPLOYEES	USERS	LOCAL COMMUNITIES - MUNICIPALITIES	MANAGEMENT AND SHAREHOLDERS	MINISTRY OF INFRASTRUCTURE	NGOs / ACTIVISTS/ LOBBIES	MOTORWAY TRAFFIC POLICE	FINANCIAL INSTITUTIONS	SUPPLIERS AND ASSOCIATES			
FINANCIAL ISSUES	Company's financial growth	○		○	○	○	○	○	○	○	○	○	○	○	○
	Indirect financial impacts from Nea Odos operations	○	○	○	○	○	○	○	○	○	○	○	○	○	○
ENVIRONMENTAL ISSUES	Fuel Consumption	○	○	○	○	○	○	○	○	○	○	○	○	○	○
	Energy consumption in buildings	○		○	○	○	○	○	○	○	○	○	○	○	○
	Energy consumption due to road lights	○		○	○	○	○	○	○	○	○	○	○	○	○
	Waste management	○	○	○	○	○	○	○	○	○	○	○	○	○	○
	Noise Management	○	○	○	○	○	○	○	○	○	○	○	○	○	○
	Air pollution	○	○	○	○	○	○	○	○	○	○	○	○	○	○
	Biodiversity	○	○	○	○	○	○	○	○	○	○	○	○	○	○
	Compliance with environmental laws	○	○	○	○	○	○	○	○	○	○	○	○	○	○
	Environmental evaluation of suppliers	○		○	○	○	○	○	○	○	○	○	○	○	○
	Environmental grievance mechanisms	○		○	○	○	○	○	○	○	○	○	○	○	○
SOCIAL ISSUES	Offer of employment	○		○	○	○	○	○	○	○	○	○	○	○	○
	Meritocratic recruitment procedures	○		○	○	○	○	○	○	○	○	○	○	○	○
	Training	○		○	○	○	○	○	○	○	○	○	○	○	○
	Equal opportunities and diversity	○		○	○	○	○	○	○	○	○	○	○	○	○
	Non-discrimination	○		○	○	○	○	○	○	○	○	○	○	○	○
	Occupational health and safety	○		○	○	○	○	○	○	○	○	○	○	○	○
	Safety of users	○		○	○	○	○	○	○	○	○	○	○	○	○
	Suitability of signage	○		○	○	○	○	○	○	○	○	○	○	○	○

- EMPLOYEES
- USERS
- LOCAL COMMUNITIES - MUNICIPALITIES
- MANAGEMENT AND SHAREHOLDERS
- MINISTRY OF INFRASTRUCTURE
- NGOs / ACTIVISTS/ LOBBIES
- MOTORWAY TRAFFIC POLICE
- FINANCIAL INSTITUTIONS
- SUPPLIERS AND ASSOCIATES



## GRI INDEX TABLE

The Corporate Social Responsibility Report of Nea Odos is developed according to GRI G4 and meets the requirements of the GRI Content Index for the "In Accordance" - Core Option.

GENERAL STANDARD DISCLOSURES	PAGE	EXTERNAL ASSURANCE
<b>Strategy and Analysis</b>		
G4-1	6	-
<b>Organizational Profile</b>		
G4-3	8	-
G4-4	8, 9, 10, 38	-
G4-5	73	-
G4-6	8, 9, 10	-
G4-7	8, 12, 13	-
G4-8	8, 9, 10	-
G4-9	8, 9, 10, 13, 14, 43 Financial Statements www.neodos.gr	-
G4-10	43, 44, 45	-
G4-11	45	-
G4-12	40, 41, 42	-
G4-13	14, 72, 73	-
G4-14	17, 26, 29, 30, 58,	-
G4-15	18, 66, 67, 68, 69	-
G4-16	18, 27, 69	-
<b>Identified Materials Aspect and Boundaries</b>		
G4-17	14	-
G4-18	19, 20, 21	-
G4-19	20, 21	-
G4-20	74	-
G4-21	74	-
G4-22	14, 72, 73	-
G4-23	72, 73	-
<b>Stakeholder Engagement</b>		
G4-24	24, 25	-
G4-25	22	-
G4-26	22, 23, 24, 36, 37	-
G4-27	23, 24	-
<b>Report profile</b>		
G4-28	72	-
G4-29	72	-
G4-30	72	-
G4-31	73	-
G4-32	75, 76	-
G4-33	73	-
<b>Governance</b>		
G4-34	13, 15	-
<b>Ethics and Integrity</b>		
G4-56	10, 11, 16, 69	-

## Specific Standard Disclosures

Material Aspects	Specific standard disclosures and indicators	Page number/link	Omissions	External assurance
<b>CATEGORY: FINANCE</b>				
Economic Performance	G4-DMA	12, 13, 14, 15, 16, 65, 69		
	G4-EC1	14, 65, 69		
	G4-EC2	14		
	G4-EC3	49, 65		
Indirect Economic Impacts	G4-EC4	Financial Statements www.neaodos.gr		
	G4-DMA	9, 10, 42, 65, 69		
	G4-EC7	8, 9, 26, 27, 28, 33, 24, 69		
	G4-EC8	40, 41, 42, 65, 66, 67, 68, 69		
<b>CATEGORY: ENVIRONMENT</b>				
Energy	G4-DMA	16, 17, 58, 59, 60		
	G4-EN3	59, 60		
	G4-EN5	60		
	G4-EN6	59, 60		
	G4-EN7	59, 60		
Biodiversity	G4-DMA	16, 17, 58, 63,		
	G4-EN11	64		
	G4-EN12	41, 63		
	G4-EN13	63, 64		
Emissions	G4-DMA	16, 17, 58, 59, 62, 63		
	G4-EN15	62, 63		
	G4-EN21	62, 63		
Effluents and Waste	G4-DMA	16, 17, 58, 59, 60, 61, 62, 64		
	G4-EN22	60, 62		
	G4-EN23	60, 61, 62		
	G4-EN24	60, 61, 64		
	G4-EN25	61		
	G4-EN26	61		
Products and Services	G4-DMA	40, 41, 58, 59, 60		
	G4-EN27	58, 59, 60, 61, 62		
	G4-EN28	-	Due to the nature of the business activity, there are no product returns	
Compliance	G4-DMA	16, 17		
	G4-EN29	16		
Transport	G4-DMA	16, 17, 41, 58, 59		
	G4-EN30	32, 59, 60		
Overall	G4-DMA	16, 17, 58, 59, 64		
	G4-EN31	4, 5, 64		
Supplier Environmental Assessment	G4-DMA	16, 17, 35, 40, 41, 42		
	G4-EN32	16, 40, 41		
	G4-EN33	16, 40, 41, 42		
Environmental Grievance Mechanism	G4-DMA	16, 17, 58, 59		
	G4-EN34	16		

Material Aspects	Specific standard disclosures and indicators	Page number/link	Omissions	External assurance
<b>CATEGORY: SOCIETY</b>				
<b>SUB-CATEGORY: LABOR PRACTICES AND DECENT WORK</b>				
Employment	G4-DMA	43, 52		
	G4-LA1	46, 47, 48		
	G4-LA2	49, 56		
	G4-LA3	49		
Occupational Health and Safety	G4-DMA	43, 54, 55, 56, 67		
	G4-LA5	55, 56, 57		
	G4-LA8	55, 56, 57		
Training and Education	G4-DMA	43, 48, 52, 53, 54		
	G4-LA9	53, 54, 56		
	G4-LA10	52, 53		
	G4-LA11	55		
Diversity and Equal Opportunity	G4-DMA	11, 43, 55		
	G4-LA12	15, 43, 44		
<b>SUB-CATEGORY: HUMAN RIGHTS</b>				
Non-discrimination	G4-DMA	11, 43, 48, 55		
	G4-HR3	43, 48		
<b>SUB-CATEGORY: SOCIETY</b>				
Local Communities	G4-DMA	42, 44, 65, 66		
	G4-S01	24, 25, 65, 66, 67, 68, 69		
	G4-S02	42, 62		
<b>SUB-CATEGORY: PRODUCT RESPONSIBILITY</b>				
Customer Health and Safety	G4-DMA	28, 29, 30, 32, 36, 37		
	G4-PR1	18, 26, 27, 28, 29, 30, 32, 69		
	G4-PR2	16		
Product and Service Labeling	G4-DMA	26, 27, 28, 29, 30		
	G4-PR3	28, 29, 30		
	G4-PR4	16		
	G4-PR5	36, 37		



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