

## G3.1 Content Index

Application Level		A	
<b>STANDARD DISCLOSURES PART I: Profile Disclosures</b>			
<b>1. Strategy and Analysis</b>			
Profile Disclosure	Description	Reported	Cross-reference/Direct answer
1.1	Statement from the most senior decision-maker of the organization.	Fully	See Sustainability Report page 5
1.2	Description of key impacts, risks, and opportunities.	Fully	See Financial Annual Report pages 8-9
<b>2. Organizational Profile</b>			
Profile Disclosure	Description	Reported	Cross-reference/Direct answer
2.1	Name of the organization.	Fully	Heracles General Cement Company
2.2	Primary brands, products, and/or services.	Fully	See Sustainability Report pages 4, 36 and 37
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	Fully	See Sustainability Report report page 4
2.4	Location of organization's headquarters.	Fully	19.3 km Markopoulou Avenue, 19002 Paiania Attica, Greece (as of 26.07.2011)
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Fully	One. The company operates in Greece only.
2.6	Nature of ownership and legal form.	Fully	Limited company registered under Greek law
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	Fully	See Sustainability Report pages 12, 13, 36 and 37

<b>2.8</b>	Scale of the reporting organization.	Fully	See Sustainability Report page 4. Number of employees is 1,268. Total assets: €815,978k; capital structure €628,062k; for beneficial ownership see Sustainability Report page 13.
<b>2.9</b>	Significant changes during the reporting period regarding size, structure, or ownership.	Fully	None. See Sustainability Report pages 4 and 7 description of changes since end of reporting period.
<b>2.10</b>	Awards received in the reporting period.	Fully	Two Lafarge Cement Awards: for the Road Transportation & Port Safety Program (See Sustainability Report page 16) and use of separate grinding (see Sustainability Report page 24). Bravo 2011 - Sustainability Dialogue awarded by QualityNet Foundation (with distinction in the following categories: Environmental performance, Employment conditions and practices, Market Approach to Economy – Society – Environment / Sustainability Context.
<b>3. Report Parameters</b>			
<b>Profile Disclosure</b>	<b>Description</b>	<b>Reported</b>	<b>Cross-reference/Direct answer</b>
<b>3.1</b>	Reporting period (e.g., fiscal/calendar year) for information provided.	Fully	1st January 2011 - 31st December 2011.
<b>3.2</b>	Date of most recent previous report (if any).	Fully	2010 Sustainability Report published July 2011
<b>3.3</b>	Reporting cycle (annual, biennial, etc.)	Fully	annual
<b>3.4</b>	Contact point for questions regarding the report or its contents.	Fully	Costas Giannaros: <a href="mailto:giannarosc@lafarge.gr">giannarosc@lafarge.gr</a>
<b>3.5</b>	Process for defining report content.	Fully	See Sustainability Report pages 8, 9 and 40.
<b>3.6</b>	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	Fully	The report covers the business of Heracles General Cement Company and its affiliate companies in Greece.
<b>3.7</b>	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	Fully	See Sustainability Report page 4.

3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	Fully	Same coverage of the business of Heracles General Cement Company as in previous years.
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	Fully	See Lafarge Group Sustainability Report 2011, page 73
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	Fully	No such re-statements have been necessary.
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	Fully	No significant changes. See Sustainability Report page 4 regarding changes which have occurred since end of reporting period and which will be relevant to the 2012 report.
3.12	Table identifying the location of the Standard Disclosures in the report.	Fully	See Sustainability Report pages 42-49.
3.13	Policy and current practice with regard to seeking external assurance for the report.	Fully	Heracles is part of the Lafarge Group. Much of the data used in the Heracles Sustainability Report is subject to Lafarge Group internal and external (Ernst and Young) verification and assurance. (See page 73 of the Lafarge Group Sustainability Report 2011 and page 40 of the Lafarge Greece Sustainability Report). We do not consider that additional assurance at company level is necessary.

<b>4. Governance, Commitments, and Engagement</b>			
<b>Profile Disclosure</b>	<b>Description</b>	<b>Reported</b>	<b>Cross-reference/Direct answer</b>
<b>4.1</b>	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	Fully	See Sustainability Report pages 6 and 7.
<b>4.2</b>	Indicate whether the Chair of the highest governance body is also an executive officer.	Fully	The Chair of the Board is not an executive officer. See Sustainability Report page 7.
<b>4.3</b>	For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.	Fully	See Sustainability Report, page 7. Our Corporate Internal Regulation prescribes that independent and non executive board members shall have no other responsibilities apart from participation in the audit committee.
<b>4.4</b>	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Fully	We uphold the rights of shareholders, including minority shareholders, as specified in Greek law. Internal mechanisms are in place for employees to make suggestions to the Management via unions and the Management meets periodically with trade union representatives
<b>4.5</b>	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).	Fully	Personal targets for both safety and sustainability are included in key managers' performance targets. See Sustainability Report page 8.

4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Fully	The Charter for the Board of Directors includes a paragraph on conflict of interest. It states that a Board member should notify the Board in a timely manner if a conflict of interest arises. Board members, Executive Committee and operational management state their compliance with our conflict of interest policies in an annual certification letter.
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	Fully	The General Assembly of shareholders assesses the performance of the Board. They take into account the balance of the Board's composition. They ensure that each Director possesses the necessary qualities, experience and competence (including on strategy, economic, environmental and social topics) thereby enabling the Board to perform its duties effectively. They implement corporate governance requirements according to Greek legislation and take into account the balance of the Board's composition
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	Fully	See Sustainability Report pages 6, 7, 8, and 9.
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	Fully	See Sustainability Report pages 6, 7, 8, and 9, and also page 11 in respect of Lafarge Group.
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	Fully	The General Assembly of Shareholders assesses the performance of the Board.

<b>4.11</b>	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	Fully	See Lafarge Group Sustainability Report 2011 page 9 and pages 48-50 referring to commitment to limiting climate change. Heracles is part of the Group and shares this commitment. See also Heracles Environmental Policy, paragraph 1 "commitment to sustainable development principles".
<b>4.12</b>	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	Fully	See Sustainability Report page 9.
<b>4.13</b>	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	Fully	See Sustainability Report page 9.
<b>4.14</b>	List of stakeholder groups engaged by the organization.	Fully	Categories of stakeholder groups are identified;see Sustainability Report pages 22 and 23. Identification of individuals and groups by name is not appropriate.
<b>4.15</b>	Basis for identification and selection of stakeholders with whom to engage.	Fully	See Sustainability Report pages 22 and 23
<b>4.16</b>	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	Fully	See Sustainability Report pages 22 and 23
<b>4.17</b>	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	Fully	See Sustainability Report pages 22, 23 and 40.

## STANDARD DISCLOSURES PART II: Disclosures on Management Approach (DMAs)

G3.1 DMAs	Description	Reported	Cross-reference/Direct answer
<b>DMA EC</b>	<b>Disclosure on Management Approach EC</b>		
<b>Aspects</b>	Economic performance	Fully	See Annual Report , page 4 and pages 28-32
	Market presence	Fully	See Annual Report, page 5 and Sustainability Report, pages 12 and 13.
	Indirect economic impacts	Fully	See Sustainability Report page 23.
<b>DMA EN</b>	<b>Disclosure on Management Approach EN</b>		
<b>Aspects</b>	Materials	Fully	See Environmental Policy and Sustainability Report, page 34.
	Energy	Fully	See Environmental Policy and Sustainability Report, page 25.
	Water	Fully	See Environmental Policy and Sustainability Report, page 33.
	Biodiversity	Fully	See Environmental Policy and Sustainability Report, pages 30 and 31.
	Emissions, effluents and waste	Fully	See Environmental Policy and Sustainability Report, pages 28, 29, 34 and 35.
	Products and services	Fully	See Annual Report page 5, Environmental Policy and Sustainability Report pages 36 and 37.
	Compliance	Fully	See Environmental Policy and Sustainability Report, page 9.
	Transport	Fully	See Sustainability Report page 25
	Overall	Fully	See Environmental Policy

<b>DMA LA</b>	<b>Disclosure on Management Approach LA</b>		
<b>Aspects</b>	Employment	Fully	See Code of Business Conduct page 7 and Sustainability Report pages 18 and 19.
	Labor/management relations	Fully	See Code of Business Conduct, introduction and page 7. Heracles is also a signatory to the Global Compact: see principles 3,4,5 and 6 of the Compact.
	Occupational health and safety	Fully	See Code of Business Conduct page 7 and Sustainability Report pages 15, 16 and 17.
	Training and education	Fully	See Sustainability Report pages 15, 16 and 17.
	Diversity and equal opportunity	Fully	See Code of Business Conduct page 7 and Sustainability Report pages 15, 16 and 17.
	Equal remuneration for women and men	Fully	See Code of Business Conduct page 7 and Sustainability Report pages 15, 16 and 17.
<b>DMA HR</b>	<b>Disclosure on Management Approach HR</b>		
<b>Aspects</b>	Investment and procurement practices	Not material	This is not a material issue for us, given the high standards of human rights in Greece and the fact that our operations and almost all of our suppliers are based in Greece.
	Non-discrimination	Fully	See Code of Business Conduct page 7
	Freedom of association and collective bargaining	Not material	These are not material issues for us, given the high standards of human rights in Greece and the fact that our operations and almost all of our suppliers are based in Greece.
	Child labor	Not material	
	Prevention of forced and compulsory labor	Not material	
	Security practices	Not material	
	Indigenous rights	Not material	

	Assessment	Not material	<b>This is not a material issue for us, given the high standards of human rights in Greece and the fact that our operations and almost all of our suppliers are based in Greece</b>
	Remediation	Not material	<b>This is not a material issue for us, given the high standards of human rights in Greece, in line with EU legislation, and the fact that our operations and almost all of our suppliers are based in Greece or the EU</b>
<b>DMA SO</b>	<b>Disclosure on Management Approach SO</b>		
<b>Aspects</b>	Local communities	Fully	<b>See Environmental Policy and Sustainability Report pages 22 and 23.</b>
	Corruption	Fully	<b>See Code of Business Conduct pages 2 and 4 and Sustainability Report page 6.</b>
	Public policy	Fully	<b>See Code of Business Conduct page 6 and Lafarge Lobbying Charter</b>
	Anti-competitive behavior	Fully	<b>See Code of Business Conduct pages 3 and 4 and Sustainability Report page 6.</b>
	Compliance	Fully	<b>See Code of Business Conduct, Environmental Policy and Sustainability Report pages 6 and 7.</b>
<b>DMA PR</b>	<b>Disclosure on Management Approach PR</b>		
<b>Aspects</b>	Customer health and safety	Fully	<b>See Code of Business Conduct page 7 and Sustainability Report page 37.</b>
	Product and service labelling	Fully	<b>See Code of Business Conduct page 2 and Sustainability Report pages 36 and 37.</b>
	Marketing communications	Fully	<b>See Code of Business Conduct page 3</b>
	Customer privacy	Fully	<b>See Code of Business Conduct page 3</b>
	Compliance	Fully	<b>See Code of Business Conduct page 2</b>

## STANDARD DISCLOSURES PART III: Performance Indicators

Economic			
Performance Indicator	Description	Reported	Cross-reference/Direct answer
<b>Economic performance</b>			
<b>EC1</b>	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	Fully	See Sustainability Report , page 13.
<b>EC2</b>	Financial implications and other risks and opportunities for the organization's activities due to climate change.	Fully	See Lafarge Group Sustainability Report 2011 page 10 (strategy for transition to sustainable economy in light of climate change). Heracles is a participant in this strategy.
<b>EC3</b>	Coverage of the organization's defined benefit plan obligations.	Fully	Heracles relies on the public pension system for its employees, not on private pension companies. However, the Company compensates retiring staff with the equivalent of 100% of the compensation in case of dismissal, and recognizes the cost of these expected payments in its financial reporting. No other significant benefit plan is run by the Company.
<b>EC4</b>	Significant financial assistance received from government.	Not material	No significant financial assistance received
<b>Market presence</b>			
<b>EC5</b>	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	Fully	Minimum wage is 118% of standard entry level. Gender is not a variable for wage calculation.

<b>EC6</b>	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	Fully	See Sustainability Report pages 38 and 39.
<b>EC7</b>	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	Fully	The majority of our staff are local hires. 15% of senior and executive management are expatriates. We recruit employees with the skills that best meet the needs of our business
<b>Indirect economic impacts</b>			
<b>EC8</b>	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	Fully	See Sustainability Report pages 22, 23 and 24.
<b>EC9</b>	Understanding and describing significant indirect economic impacts, including the extent of impacts.	Fully	See Sustainability Report page 23.
<b>Environmental</b>			
<b>Performance Indicator</b>	<b>Description</b>	<b>Reported</b>	<b>Cross-reference/Direct answer</b>
<b>Materials</b>			
<b>EN1</b>	Materials used by weight or volume.	Fully	6,542 kt of raw materials and 308 kt of fuels
<b>EN2</b>	Percentage of materials used that are recycled input materials.	Fully	9.3% of our cement raw materials are from recycling (fly ash, slag and calamine)
<b>Energy</b>			
<b>EN3</b>	Direct energy consumption by primary energy source.	Fully	2,115,473 GJ coal, 6,268,707 GJ petcoke, 103,210 GJ oil, 43,173 GJ natural gas, 138,153 GJ biomass and 34,538 GJ other alternatives. In total 8,703,254 GJ
<b>EN4</b>	Indirect energy consumption by primary source.	Fully	352,703 MWh or 1,269,731 GJ. All electrical energy is purchased by the PPC (Public Power Corporation) with the following energy mix for 2011: c.46% lignite, c.8% diesel, c.25% natural gas, c.7% hydropower, c.8% other renewables and c.6% imports.

EN5	Energy saved due to conservation and efficiency improvements.	Fully	See Sustainability Report pages 25, 26 and 27.
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	Fully	See Sustainability Report page 25 (alternative fuels, innovation in grinding), 36 and 37 (our products, ATHLOS TM) and 39 (combined deliveries)
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	Fully	See Sustainability Report page 35 (Think before you ink)
<b>Water</b>			
EN8	Total water withdrawal by source.	Fully	See Sustainability Report page 33.
EN9	Water sources significantly affected by withdrawal of water.	Not material	No such water sources are affected.
EN10	Percentage and total volume of water recycled and reused.	Fully	49,500 m3 is from rainwater harvesting (4% of consumed water) and 795,761 m3 from desalination (22% of withdrawn water)
<b>Biodiversity</b>			
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Fully	<p>1. Milos island  Pozolane quarry which consists of:  227,000 m2 land owned  439,000 m2 land leased  The quarry area is in a protected area of the "red viper" as well as adjacent to Natura 2000 protected zone</p> <p>2. Hornstone quarries (two) in Anavra Volos. Both quarries are leased  i) The first is 135,000 m2 and  ii) the other 230,000 m2  both are inside the Natura 2000 protected zone</p>

<b>EN12</b>	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	Fully	Our main impact on biodiversity is that caused by quarrying (in quarries that supply cement plants and the quarries of LAVA). This causes alteration in the landscape, loss of habitat (temporary or permanent), habitat creation and associated changes.
EN13	Habitats protected or restored.	Fully	See Sustainability Report pages 30 and 31.
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	Fully	See Lafarge Group Sustainability Report pages 62-64 and Sustainability Report pages 30 and 31.
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	Fully	Two: Vipera scwheizeri and the Mediterranean seal (monachus monachus) at the pozzolan quarry on Milos island.
<b>Emissions, effluents and waste</b>			
<b>EN16</b>	Total direct and indirect greenhouse gas emissions by weight.	Fully	2,137,724 metric tons according to the methodology specified in EU directive 2007/589
<b>EN17</b>	Other relevant indirect greenhouse gas emissions by weight.	Fully	This is estimated to be 45,000 tn CO2
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Fully	See Sustainability Report pages 25, 26 and 27 (alternative fuels, separate grinding, fly ash substitute for clay) and 39 (combined deliveries)
<b>EN19</b>	Emissions of ozone-depleting substances by weight.	Fully	0
<b>EN20</b>	NOx, SOx, and other significant air emissions by type and weight.	Fully	See Sustainability Report pages 28 and 29.
<b>EN21</b>	Total water discharge by quality and destination.	Fully	See Sustainability Report page 33.
<b>EN22</b>	Total weight of waste by type and disposal method.	Fully	See Sustainability Report page 35.
<b>EN23</b>	Total number and volume of significant spills.	Fully	0

EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	Fully	No hazardous waste is transported, imported, exported or treated by us. In 2011, 2 tn of hazardous construction waste (asbestos cement) coming from one of our cement plants were exported through an authorized subcontractor. Also see Sustainability Report page 35
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	Fully	No wetland or water body is significantly affected by water discharges. See Sustainability Report pages 30 and 31.
<b>Products and services</b>			
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	Fully	See Sustainability Report pages 36, 37, 38 and 39.
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	Fully	100% of packaging materials used for bagged cement are reclaimed. Packaging materials are not an issue for bulk cement sales.
<b>Compliance</b>			
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Fully	1 monetary fine of 30,000€, 0 non monetary sanctions for cement. For LAVA quarries 29,961€
<b>Transport</b>			
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	Fully	These are not identified as key impacts for our business but see Sustainability Report page 39 for actions being taken.
<b>Overall</b>			
EN30	Total environmental protection expenditures and investments by type.	Fully	See Sustainability Report page 9.

<b>Social: Labor Practices and Decent Work</b>			
<b>Performance Indicator</b>	<b>Description</b>	<b>Reported</b>	<b>Cross-reference/Direct answer</b>
<b>Employment</b>			
<b>LA1</b>	Total workforce by employment type, employment contract, and region, broken down by gender.	Fully	See Sustainability Report pages 18, 19, 20 and 21. Of the 1,268 employees, 1,130 are men and 138 women. 100 % are on full time contracts. The vast majority of our employees are based in Greece.
<b>LA2</b>	Total number and rate of new employee hires and employee turnover by age group, gender, and region.	Fully	The turnover rate is 1% for men and 36% for women, while it is 1% for the ages below 30, 1% for the ages 31-50 and 10% for the ages above 50.
<b>LA3</b>	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	Fully	This is not applicable as all our employees are full time.
<b>LA15</b>	Return to work and retention rates after parental leave, by gender.	Fully	Under Greek law, 3 women were entitled to 6 months unpaid leave and 2 took it. 29 people (5 women and 24 men) were entitled to another 4 months (available to both parents until the child is 6), of which 2 men took it.
<b>Labor/management relations</b>			
<b>LA4</b>	Percentage of employees covered by collective bargaining agreements.	Fully	All, as per applicable law in Greece
<b>LA5</b>	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	Fully	As per applicable law. Notice period is not specified in Collective Agreements.

<b>Occupational health and safety</b>			
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	Fully	All employees are covered by Health and Safety Committees, with elected representatives in the plants
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender.	Partially	For rates of injury see page 17. No occupational diseases. No fatal, 1 lost time accident involving a male. Lost days due to accidents: 61 involving a male Absenteeism rate--> 2.06 %
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	Fully	The comprehensive Heracles General Cement Company occupational health program includes educational and preventive measures
LA9	Health and safety topics covered in formal agreements with trade unions.	Fully	European Social Dialogue agreement NePSi on the protection of workers of Respiratory Crystalline Silica
<b>Training and education</b>			
LA10	Average hours of training per year per employee by gender, and by employee category.	Fully	<u>Cement</u> Managers: 44.8h and Non Managers: 12.8h Male: 17.9h and Female: 19.6h
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	Fully	See Sustainability Report pages 18, 19, 20 and 21.
LA12	Percentage of employees receiving regular performance and career development reviews, by gender.	Fully	See Sustainability Report page 20. 100% of our cadre population receives annual and mid year performance reviews and there is no difference by gender.
<b>Diversity and equal opportunity</b>			
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	Fully	On the Executive Committee 22.3% are female and 77.7% male. Age 31-50= 77.7%, 50+=22.2%, Nationality: Impatriates: 22.2% Employees: See Sustainability Report pages 20 and 21.

<b>Equal remuneration for women and men</b>			
<b>LA14</b>	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	Fully	Heracles has a gender-neutral pay system which is compliant with Greek and EU pay equality legislation.
<b>Social: Human Rights</b>			
<b>Performance Indicator</b>	<b>Description</b>	<b>Reported</b>	<b>Cross-reference/Direct answer</b>
<b>Investment and procurement practices</b>			
<b>HR1</b>	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening.	Not material	This is not a particularly material issue for us, given the high standards of human rights in Greece. All of our investments are in Greece.
<b>HR2</b>	Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken.	Not material	This is not a particularly material issue for us, given the high standards of human rights in Greece, the fact that 64% of our supplies are sourced from Greece and the majority of the rest is EU based. Consequently we do not track data on this matter.
<b>HR3</b>	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	Not material	This is not a particularly material issue for us, given the high standards of human rights in Greece.
<b>Non-discrimination</b>			
<b>HR4</b>	Total number of incidents of discrimination and corrective actions taken.	Fully	No incidents related to breach of the Code of Business Conduct principles concerning discrimination were reported through the business in Greece.
<b>Freedom of association and collective bargaining</b>			
<b>HR5</b>	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	Not material	Not applicable. Freedom of association is guaranteed in Greece.

<b>Child labor</b>			
<b>HR6</b>	Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor.	Not material	Not applicable. Child labor not a material issue in Greece
<b>Prevention of forced and compulsory labor</b>			
<b>HR7</b>	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor.	Not material	Not applicable. Forced and compulsory labor not lawful in Greece.
<b>Security practices</b>			
<b>HR8</b>	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	Not material	This is not a particularly material issue for us, given the high standards of human rights in Greece.
<b>Indigenous rights</b>			
<b>HR9</b>	Total number of incidents of violations involving rights of indigenous people and actions taken.	Not material	This is not a material issue in Greece.
<b>Assessment</b>			
<b>HR10</b>	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	Not material	This is not a particularly material issue for us, given the high standards of human rights in Greece.
<b>Remediation</b>			
<b>HR11</b>	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.	Not material	This is not a particularly material issue for us, given the high standards of human rights in Greece.

<b>Social: Society</b>			
<b>Performance Indicator</b>	<b>Description</b>	<b>Reported</b>	<b>Cross-reference/Direct answer</b>
<b>Local communities</b>			
<b>SO1</b>	Percentage of operations with implemented local community engagement, impact assessments, and development programs.	Fully	Each of our sites, as part of their local integration plans, assesses the primary and secondary value created by our operations. See Sustainability Report pages 22 and 23.
<b>SO9</b>	Operations with significant potential or actual negative impacts on local communities.	Fully	Our cement plants and quarries have this potential; our distribution centres have limited potential. Measures for minimising negative impacts and maximising positive ones are described in the Sustainability Report pages 22 and 23. Also all sites are subject to strict environmental terms attached to their operational licences.
<b>SO10</b>	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	Fully	See Sustainability Report pages 22, 23 and 24.
<b>Corruption</b>			
<b>SO2</b>	Percentage and total number of business units analyzed for risks related to corruption.	Fully	100% of Heracles Cement Company
<b>SO3</b>	Percentage of employees trained in organization's anti-corruption policies and procedures.	Fully	See Sustainability Report pages 6 and 7; percentage trained so far is 44%
<b>SO4</b>	Actions taken in response to incidents of corruption.	Fully	There was one such incident. Two of the employees involved left the company, without compensation. The company filed a criminal complaint in respect of the third employee involved. The criminal investigation is ongoing.

<b>Public policy</b>			
<b>SO5</b>	Public policy positions and participation in public policy development and lobbying.	Fully	See Lafarge Group Sustainability Report 2011, pages 9-11, and Lafarge Lobbying Charter. These public policy positions are adopted on behalf of the Lafarge Group of which Heracles is part.
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	Fully	0
<b>Anti-competitive behavior</b>			
SO7	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	Fully	0
<b>Compliance</b>			
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	Fully	0
<b>Social: Product Responsibility</b>			
<b>Performance Indicator</b>	<b>Description</b>	<b>Reported</b>	<b>Cross-reference/Direct answer</b>
<b>Customer health and safety</b>			
<b>PR1</b>	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	Fully	The company assesses the impact of products and services on health and safety during their production, transport and use. Products are labeled accordingly and safe instructions are provided to users. The 3 bagged products and the 2 small bags products are subject to the European Directive for hexavalent chromium limitation and have controlled expiration date. All packed products are labeled accordingly and safe instructions are provided to users.

PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	Fully	None
<b>Product and service labelling</b>			
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	Fully	Material Safety Data Sheets (MSDS) are available for all types of our products. These are provided to our clients and users and are also posted on our website
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	Fully	None
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	Fully	See Sustainability Report page 36.
<b>Marketing communications</b>			
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	Fully	Members of the Communication Control Council
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	Fully	None
<b>Customer privacy</b>			
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	Fully	None
<b>Compliance</b>			
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	Fully	None