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Preface by the President of AKTOR

In the rapid changing world that we live in, we believe that the **protection** and the **preservation** of the environment are prerequisites for the survival of mankind thus they constitute part of the general philosophy and business policy of AKTOR.

The compliance with the legal requirements, prevention of environmental pollution in which AKTOR activates and the continual improvement of our environmental performance, are the basic axes of our environmental strategy aiming at the overall **sustainable development** and the improvement quality of life of the entire society.

The Chairman and General Director
of AKTOR S.A.

Dimitrios Koutras

Night view of Attiki Odos



1. INTRODUCTION

AKTOR has developed and implements an Environmental Management System (EMS), according to the guidelines of the **European Regulation (EC) No. 761/2001 EMAS «Eco Management and Audit Scheme»** and has been upgraded by the new Legislation EMAS III / EC 1221 / 2009. The EMS is under annual audits by an independent Certification Body.

Under the requirements of EMAS III and verification of EMS from the independent Certification Body, author the nonce Environmental Statement, to provide environmental information of AKTOR in all interested parties.

The nonce Environmental Statement includes the period June 2009 – December 2010. This arose because of the new Regulation EMAS III and the need of AKTOR to adapt its requirements, but also for practical business reasons for presenting the results along with the financial results and preparing of the annual Sustainability Reports. Henceforth the environmental performance results will be presented and to the Sustainability Reports, integrated.

Within this technical change, environmental performances will relate to periods Jan – Dec. each year and the charts from 2009 and now will be presented separately from previous reporting periods.

The data included in this Environmental Statement concern the environmental policy, the environmental impacts and performance, as well as the results based on the environmental objectives and targets that the company has set.

View of the new Acropolis Museum



2. INFORMATION ON AKTOR S.A.

AKTOR is a leading construction company in Greece. AKTOR possesses dynamic management, employs a large number of engineers and other specialized personnel that constitute the most significant asset on which AKTOR bases its development course.

AKTOR constructs the most significant and modern infrastructure and development projects as well as private works in Greece, while it is also activated in the rest of Europe and in the Middle East.

The construction sectors in which AKTOR is activated are:

Roads and technical infrastructure projects, Tunnels, Hydraulic projects, Building and industrial projects, Port projects, Electromechanical projects, Energy and power generation plants, B.O.T. Projects (co-financed projects), Environmental, landscape restoration and other projects, as well as Building Maintenance.

3. ENVIRONMENTAL POLICY

The respect and protection of environment are part of the broad philosophy of AKTOR's business policy, representing the basic principles on which the long term, environmentally friendly planning of the development of the company is based.

Focusing at the protection of environment the management of AKTOR commits itself to:

- **the compliance with all current national and European legislative and other regulatory requirements**
- **the continual improvement of the environmental performance and contribution to the sustainable development**
- **prevention of pollution with the application of constantly friendlier environmental technologies and construction methods**

The targets of the Environmental Policy are:

- **the minimization of waste** through recycling, reuse and control of generated waste
- **the minimization of noise, vibrations and other nuisances** through integrated planning of project's implementation, in order to decrease the impacts general on society, traffic, public networks, the protected areas, etc.
- **the protection of archaeological sites and monuments of our cultural heritage**
- **the rehabilitation of green sites and the landscape of the projects in general** through environmental programs according to the approved environmental studies and environmental conditions of each project
- **the proper management of raw materials** for the construction of projects and the wise use of the natural resources in general, such as energy, water etc.
- **the aesthetic upgrade and harmonic integration** of the worksites in the immediate and wider environment in which the projects of AKTOR are implemented
- **the protection of the employees** and the assurance of conditions that contribute to the balanced management of problems due to the interaction between the working and broader environment
- **the reinforcement of the environmental awareness** of the employees, through continuous informing and training

4. ENVIRONMENTAL MANAGEMENT SYSTEM

The Environmental Management System (EMS) of AKTOR constitutes an integrated system for the overall and proper management of environmental issues regarding the construction activity of the company.

The construction activity in general and the parameters that may have an impact on the environment are analyzed and approached through the EMS, while preventive measures and actions are defined and taken.

The EMS that AKTOR applies consists of three dossiers, besides this present Environmental Statement. These dossiers are:

DOSSIER I: Environmental Management Folder (EMF - 01), regarding the general EMAS requirements, the Environmental Policy and the targets, the structure and organization of the company, the responsibilities and duties of relevant personnel and, finally, the environmental issues of the construction activity and operation of buildings.

DOSSIER II: Environmental Management Procedures (EMP - 02), in which the procedures required by EMAS, are included.

DOSSIER III: Environmental Management Directives (EMD - 03), regarding the environmental implementation of the projects at the worksites.

The EMS, that the personnel of AKTOR implements, is based on the guidelines of EMAS aiming at the compliance. Aims keeping the Environmental Policy during construction activity and with the belief that the application of this System upgrades the level of AKTOR, ensures the implementation of the Policy, while achieves a continual improvement of the environmental performance benefiting the environment and the society as a whole.

View of west peripheral Ymmitos Highway



The EMS that AKTOR applies is based on certain Structure and Organization of the company, as well as on accustomed procedures for control, monitoring, measuring and recording the environmental impacts to the immediate and broader environment in which the projects, that the company undertakes, are implemented.

It is in this framework, that the Top Management of the company has developed during the past years the Department of Sustainable Development (DSD) concerning the environment and the company's corporate responsibility to society.

The Department of Sustainable Development employs expert and competent personnel on issues of environment, to whom specific responsibilities have been assigned while the communication with the Top Management, the other Departments, and the worksites of AKTOR is presented in the general organizational chart of the company (Annex I) as well as in the organizational chart of the Department of Sustainable Development (Annex II). The responsibilities and duties are elaborated in detail inside the EMS as in directives or procedure separately.

Furthermore, in the EMS of AKTOR there is a typical organizational chart that is applied in the worksites and in other activities of the company. In this typical organizational chart the basic personnel in the worksites, its position in the company hierarchy and the way of communication with the chief of the project, are defined.

The Project Manager of each project, in direct cooperation with DSD of the company, has the full responsibility for the promotion and application of the Environmental Policy and the EMS of AKTOR in every level of the worksite.

In this respect, the work site engineer responsible on environmental issues, the engineers of the project and anyone else deemed necessary are properly authorized with tasks, bearing the responsibility for the implementation of the policy and the environmental rules of the company.

Meanwhile, the current director or worksite manager provides policy makers with the full support in carrying out their duties.

However the responsibility for the implementation of the Policy and the EMS in every level of the project and by all employees lies with the General project manager or worksite manager of every project.

A basic element of the environmental management system is the informing and training of the human resources of the company on issues regarding the protection of the environment and the improvement of the environmental awareness of the employees.

It is a belief of the management that the success of the effort to implement such an environmental management system goes through with the awareness of the basic principles of protection and respect of the environment, resulting in an active personal contribution of every employee.

View of geothermic application



5. ENVIRONMENTAL ASPECTS AND IMPACTS

Environmental aspect defined as any element of activities or products or services of an organization that can interact with the environment.

As environmental impact is any change to the environment, whether adverse or beneficial wholly or partially resulting from the construction activity.

In AKTOR the environmental aspects from the entire construction activity have been identified and the relevant environmental impacts have been assessed, in order to evaluate the significance or relevant environmental impacts, so as to determine the environmental objectives of the company.

The significant environmental aspects during construction or operation phase of the projects are the following:

- emissions to air
- releases to water
- pollution and contamination of land
- solid, special and hazardous waste
- excavation and demolition products
- waste of used oils, batteries and tyres of vehicles
- specific issues such as archaeological sites, cultural heritage, sensitive and/or protected areas
- local issues such as noise, vibrations, dust, visual nuisance, social nuisances etc.

All these aspects are important for the entire construction activity of AKTOR, while for each project they give rise to the significance of the environmental impacts, according to the construction or operation phase, the immediate and broad environment, the different special conditions, the legal requirements, the environmental terms etc.

View of Highway Korinthos-Tripoli



6. ENVIRONMENTAL OBJECTIVES AND TARGETS

The environmental objectives and targets regarding the environmental aspects of the construction activity are:

OBJECTIVES	TARGETS
Minimization of dust and air pollution	Prevention and settlement of dust through drenching, covering of all the transported loads and frequent maintenance of machinery and vehicles regarding their air emission levels as stated by the legislation
Minimization of water pollution	Collection and management of worksite wastewater and prohibition of disposal of waste into water recipients
Minimization of soil and landscape degradation	Scheduled and integrated management of the following chain: “Land – excavation products – raw materials – disposal – land restoration” to each project
Solid and other waste management	Prevention, minimization, recycling, reuse of materials
Special and hazardous waste management	Delivery to specialized companies, approved by the state, for the disposal and management of hazardous waste and issuance of certificates for their proper management
Used oils, used oil packaging, batteries and tyres waste management	Collection of used oils, used oil packaging, old batteries and tyres and delivery for regeneration and recycling to the licensed, by the government, bodies – issuance of certificate.
Electric and electronic equipment	Collection of equipment and delivery for recycling to the licensed, by the government, body – issuance of certificate.
Minimization of noise, vibrations, nuisances and protection of the cultural heritage	Use of project machinery with “CE” certificate and labelling regarding noise, installation of noise barriers, compliance with the vibration levels, respect for the society, aesthetic upgrading, harmonic integration of projects into the immediate and broader environment, and cooperation with archaeological authorities
Excavation and demolition products management	Proper management of these products and reuse or integration into the construction
Energy and natural resources management	Saving energy and conserving natural resources

The following results or performances given below in chapter (7), have resulted through a collective effort to achieve the basic objectives and targets of AKTOR.

7. SUMMARY OF ENVIRONMENTAL PERFORMANCE

AKTOR maintains aggregated environmental performance data from the worksites and the main offices. Based on the initial environmental certification of AKTOR, in June 2004, as annual cycle of inspections was in fact round from June to May each year.

As already mentioned, it was decided that from now on the Environmental Statement covers the period from January to December each year, following all the other economic, sustainability, and etc. cycles. Therefore, this Environmental Statement will refer to the data and the performance period January - December 2009 and January – December 2010, because, as already mentioned in Chapter 1, was not presented last June 2010, for the period June 2009 – June 2010.

However, it is stated that the EMS is applied consistently and fully, while last June was inspected based only on ISO 14001:2004, due to an extension of the new EMAS III (update – extend from YPEKA from 16.07.2010).

The performance for the period of January - December 2009 is summarized as followed:

ENVIRONMENTAL PERFORMANCE OF 2009	QUANTITIES	UNITS	MANAGEMENT METHOD
Paper	30.630	Kg	Collection and delivery for recycling
Toner, ink cartridges	232	Pieces	Collection and delivery for reuse
Used oils	100.500	Kg	Collection and delivery for regeneration
Packing bins of used oils	454	Pieces	Collection and delivery for recycling
Electric and electronic equipment waste	4.390	kg	Collection and delivery for recycling
Old batteries of vehicles and Project Machinery - with office batteries	16.031	kg	Collection and delivery for recycling
Old metals (scrap)	596.910	Kg	Collection and delivery for recycling
Tires	773	Pieces	Collection and delivery for recycling
End-of-life vehicles	20	Pieces	Delivery for alternative management
Liquid - solid waste	2.100	Kg	Receiving and management of the liquid waste by the supplier
Fluorescence lamps	100	Kg	Collection and delivery for recycling
Cultural heritage			Continuous measurements of noise and vibrations, air emissions control, aesthetic fencing – panels, nuisances minimization etc. Fencing with special panels of the new Museum of Acropolis.
Special natural beauty areas			Nuisances minimization, prevention of land and nature alteration etc
Traffic arrangements and interventions			Integrated, scheduled and prompt notification of the public, proper labelling, communication with interested parties, etc

While performance for the period January – December 2010, are as follows:

ENVIRONMENTAL PERFORMANCE OF 2010	QUANTITIES	UNITS	MANAGEMENT METHOD
Paper	48.850	Kg	Collection and delivery for recycling
Toner, ink cartridges	738	Pieces	Collection and delivery for reuse
Used oils	75.000	Kg	Collection and delivery for regeneration
Packing bins of used oils	560	Pieces	Collection and delivery for recycling
Batteries	6.819	kg	Collection and delivery for recycling
Electric and electronic equipment waste	5.555	kg	Collection and delivery for recycling
Old metals (scrap)	1.140.060	Kg	Collection and delivery for recycling
Tires	571	Pieces	Collection and delivery for recycling
End-of-life vehicles	5	Pieces	Delivery for alternative management
Liquid - solid waste	2.900	Kg	Receiving and management of the liquid waste by the supplier
Fluorescence lamps	388	Kg	Collection and delivery for recycling
Cultural heritage			Continuous measurements of noise and vibrations, air emissions control, aesthetic fencing – panels, nuisances minimization etc. Fencing with special panels of the new Museum of Acropolis.
Special natural beauty areas			Nuisances minimization, prevention of land and nature alteration etc
Traffic arrangements and interventions			Integrated, scheduled and prompt notification of the public, proper labelling, communication with interested parties, etc

For the above quantifiable environmental performance AKTOR keeps all the ecological management certificates of the waste from issued from officially licensed bodies.

The results of the total environmental performance of the company for the management period January 2009 – December 2010 are presented and commented accordingly.

USED OILS

The used oils are stored as special waste in sealed barrels that are stored and secured in confinement sites or in special collection tanks that are constructed for this purpose. The majority of the quantities of used oils are collected to the Mechanical Equipment Maintenance Center of AKTOR in Magoula of Attica where all the equipment of the company is distributed. But also large quantities moving from the big active worksites.

In the following chart we observe that the performance in regenerating oils follows the fluctuation of the construction activity. During the period of the fall of the construction activity the quantities were reduced due to the small number of active worksites, while in the recovery periods an increase in the environmental performance of the company is depicted.

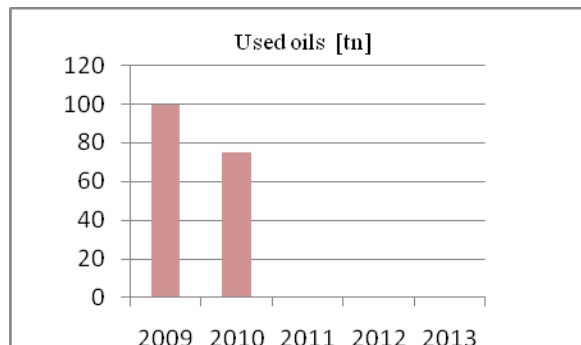
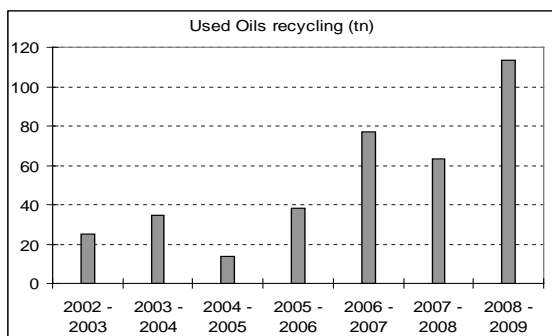
Thus for example the quantities of used oils that were sent for regeneration in the period 2005-2006 almost tripled in comparison to the previous period 2004-2005, while in the period 2006 – 2007 the quantities of collection and recycling present an important increase due to the increase of projects undertaken.

During the period 2007 – 2008 there is a certain decrease of the used oils and this is mainly due to the existence of a large proportion of construction machinery of new best available technology.

During the period 2008-2009 there is a remarkable increase of regenerated oils and this is due to the increased number of substructure projects, and mainly because of the improved environmental performance of the personnel with the environmental duties in the projects.

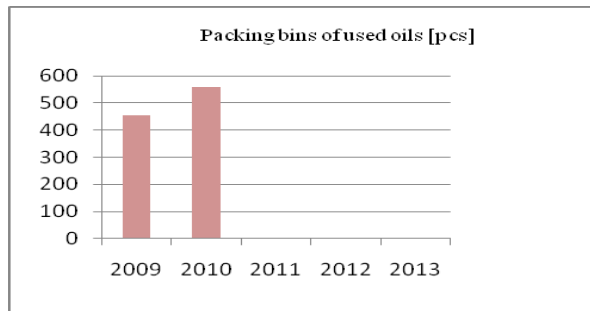
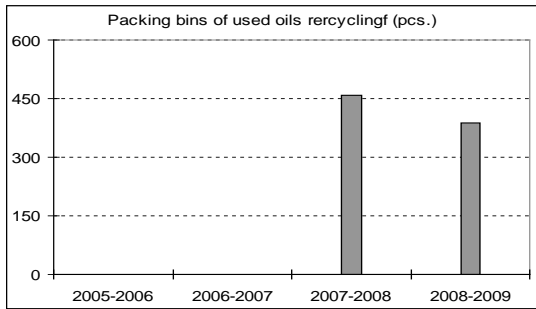
The slight decline recorded in the period January – December 2009 due to signs of influence of global economic crisis, in the construction industry of Greece also.

All the quantities of used oils are collected by the officially licensed body “Elliniki Technologia Perivallontos S.A.”, which issues to AKTOR a certificate for their regeneration. The downturn in 2010 due to economic crisis and a sharp drop in construction activity, leading to a slowdown in the works



PACKING BINS OF USED OILS

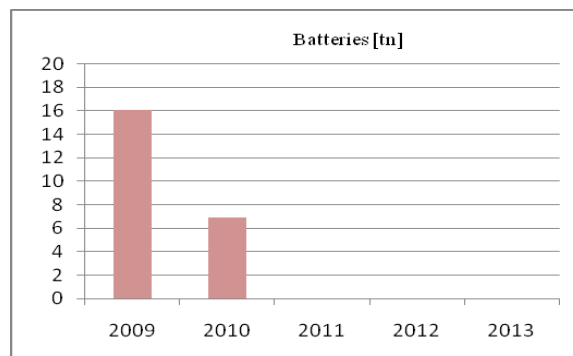
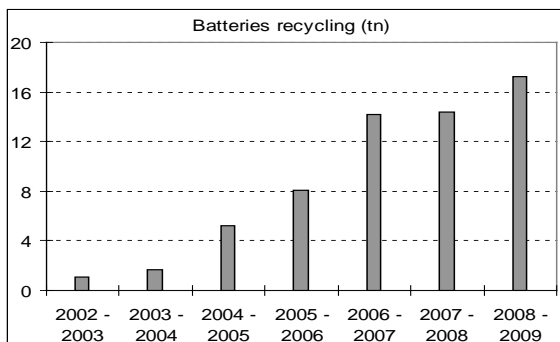
During the year 2007 the recycling of used oils’ packing bins began. The quantity of bins that have been recycled is presented in the nonce chart. There is a discrepancy in the curve and oil tanks. The explanation given at the moment is that many sites completed their work and therefore areas where cleaned. The curves will be monitored and will be further assessments if necessary.



BATTERIES

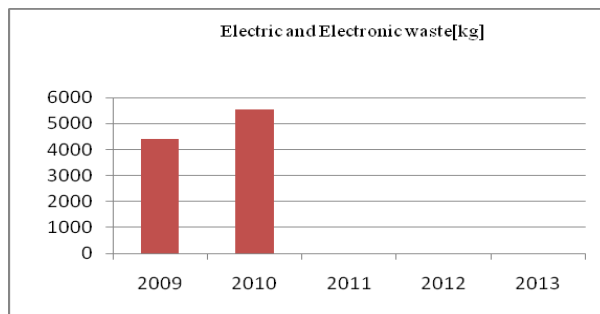
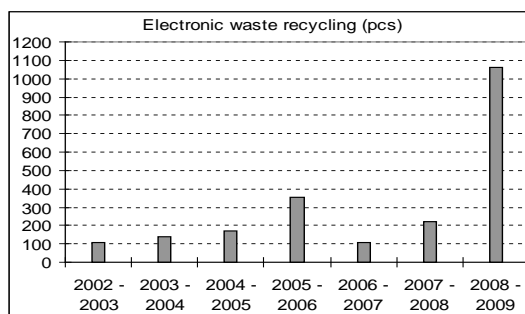
The old batteries of vehicles and project machinery of the worksites and at the Mechanical Equipment Maintenance Center of AKTOR are collected and placed in special bins from where they are collected by the official recycling body “SYDESYS S.A.”. In this way any leakages and environmental pollution are prevented. Thus with the more organized capacity of collection and recycling of batteries, but also with the improvement of environmental awareness in the company, the better application of environmental directives and rules, the possibility to rent a special bin from the recycling body and the collection from each worksite in Greece, a high percentage of recycling of batteries was possible. In the following graph we observe that the performance in batteries recycling is constantly improving, after the formal being of the management body. During the first three years the amount of recycling from year to year almost doubled, following the last upward course of undertaking projects, while the last three years show steady upward trend all the quantities of batteries arise from the activities of the company since 2005 are received and collected for recycling from the officially licensed body SY.DE.SYS, which issues a recycling certificate to AKTOR. For the quantities before 2005 there are also recycling certificates from an officially licensed company for batteries collection and recycling.

The downturn in 2010 due to economic crisis and a sharp drop in construction activity, leading to a slowdown of the woks.



ELECTRIC AND ELECTRONIC WASTE

During the period 2005-2006 a program for the upgrading of electronic equipment took place, which resulted in the existence of large quantities of electronic waste that were sent for recycling. In the chart of electric and electronic waste a decrease of the quantities that were sent for recycling in 2006 – 2007 is observed, due to the preceding recycling. During the period 2007 – 2009 the recycled waste doubled. The reason is the renewal of the equipment with the relocation of the company to its new headquarters building, and the fact that a number of projects (EGNATIA / PATHE / METRO etc.) were completed sending the old equipment they used for recycling. The recycling of the equipment is done in cooperation with the officially licensed body “Electrocycle S.A.” and with the issuance of a recycling certificate to AKTOR.

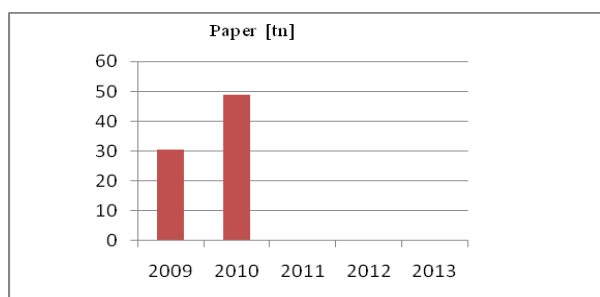
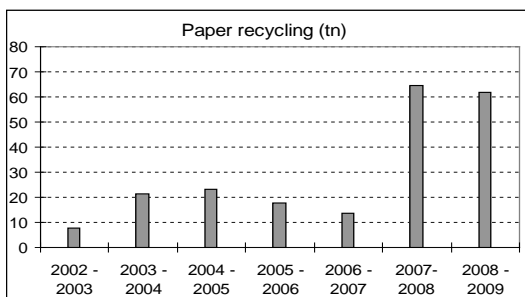


Note: it is found that the number of items (eg. very small waste, cable, memory, mouse, etc.) do not reflect an objective picture of waste recycled, etc. For this reason, we decided in the future the electronic and electrical waste is presented in pounds.

PAPER

The great increase of recycling paper, during the following years 2007-2008, is attributed to the installation of the company in the new offices, which accompanied the destruction of files and as well as the assignment of the new concession projects and the studies concerning the projects.

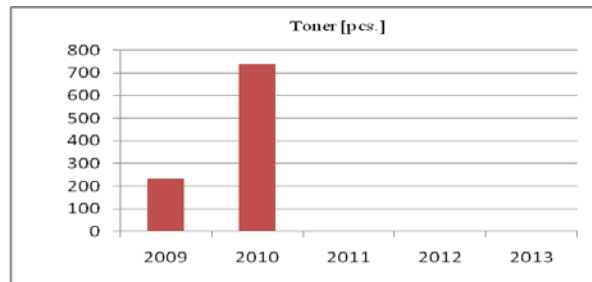
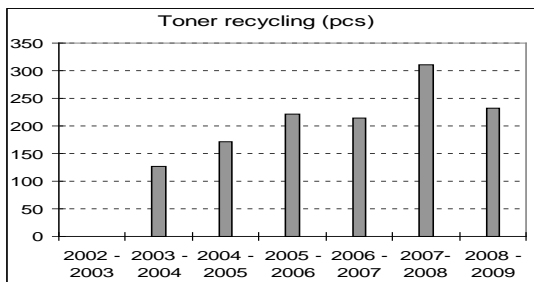
The observed decrease in 2009 is due to the completion of many projects and worksites diminishing because of the crisis. The increase in 2010 is due to increased interest and other events in the final completion of projects. The recycling is implemented in cooperation with the licensed company “Recycling Tziliaskopoulos Giorgos”.



TONER, INK CARTRIDGES

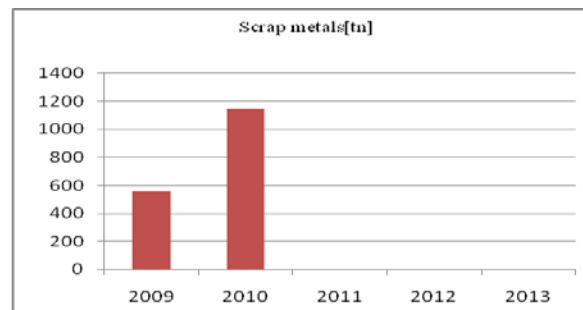
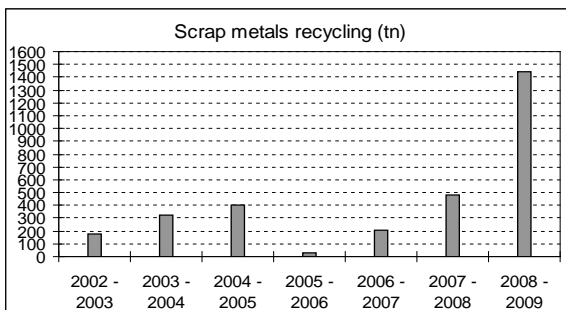
As shown in the following chart, the environmental performance in ink and toner cartridges generally follows an improving trend. These wastes are generated mainly from the operation of electric and electronic equipment primarily in the headquarters of the company, which is maintained and repaired by specific personnel that have fully understood the environmental requirements of the company. The recycling rate of these materials, especially in the main offices of AKTOR is very high and we hope that it will soon reach 100%. The quantities increased in 2010 due to shipment for recycling toner from worksites that completed their work and parallel the material recycling.

The recycling is implemented in cooperation with the licensed company “Recycling Tziliaskopoulos Giorgos”.



SCRAP METALS

During the period 2002-2004 the company applied an integrated program of equipment recycling that resulted in the increasing rate of scrap metals recycling. Apart from these, the steel from worksites that emerges as scrap is also included in the quantities. During the period 2005 – 2006 a limited recycling quantity arose due to the new equipment was purchased by AKTOR, but the finished projects instead, considering that there had been the Olympic season with big projects. During 2006 – 2007 the projects are in full operation and thus there is an increase in the quantities which also continues during the period 2007 – 2008. During the period 2008-2010 there is a rapid increase because of the consciousness to conclude data of wastes that can not be characterized as dangerous wastes.

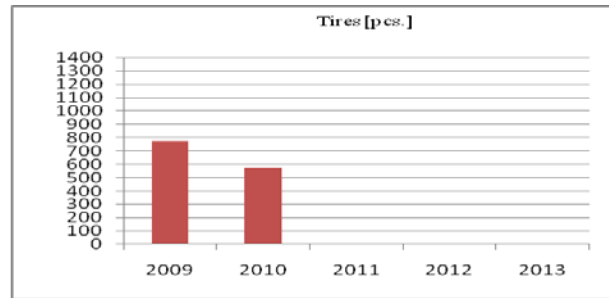
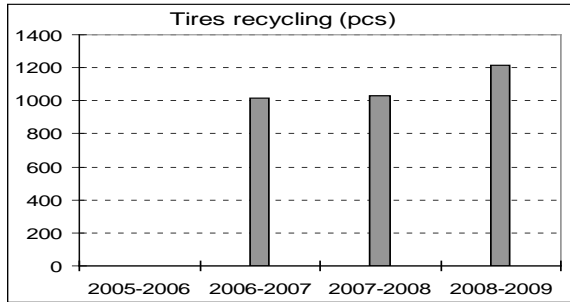


The quantities of old scrap metals mentioned above are sent by the worksites directly to the steel works, while documents – shipping bill are in the accounting records of the worksites. Steel is not characterized as a dangerous waste, although the recycling procedure provides an economic benefit recorded on worksites and there are records of the quantities.

TIRES

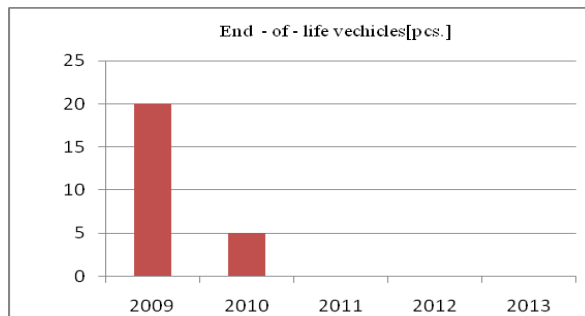
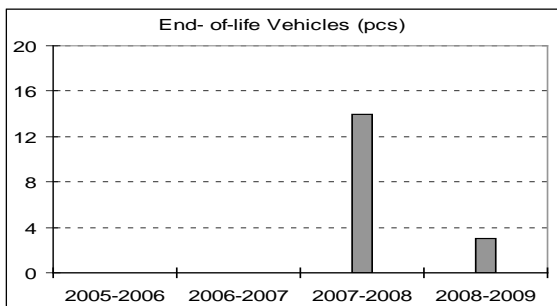
Although the company recycles any type of waste, concerning tires there was a legislative problem, as no official body existed for the alternative management of used tires.

With the commencement of operation of the tires management body ECOELASTIKA, AKTOR signed a cooperation contract and during the period 2006-2010 has sent the tires presented in the chart.



END-OF-LIFE VEHICLES

End-of-life vehicles are those old cars and light trucks whose owners have decided to not use them anymore and want to hand in their license plates permanently. During the period 2007 – 2010, 42 vehicles were sent to the body EDOE (Alternative Vehicle Treatment of Greece), which destroys – recycles vehicles since 2004.



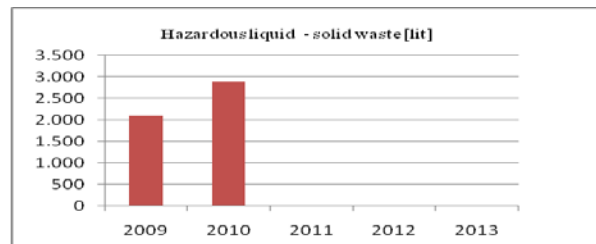
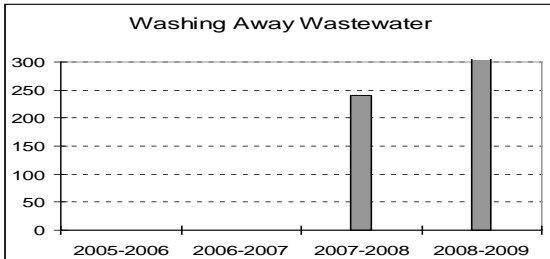
AKTOR possesses mainly equipment above 3,5 tn of mixed load, that due to the above mentioned limitation by EDOE, are send for recycling as scrap.

HAZARDOUS LIQUID – SOLID WASTE

During the implementation of repair and maintenance works of equipment parts, a special technology of washing with (SPW) proper liquids is being used.

AKTOR has a contract with a company that collects the washing away wastes and manages them appropriately. In hazardous waste and wastewater are added. The large increase is due to the quantities neutralization mission from hazardous waste of worksites reimbursements.

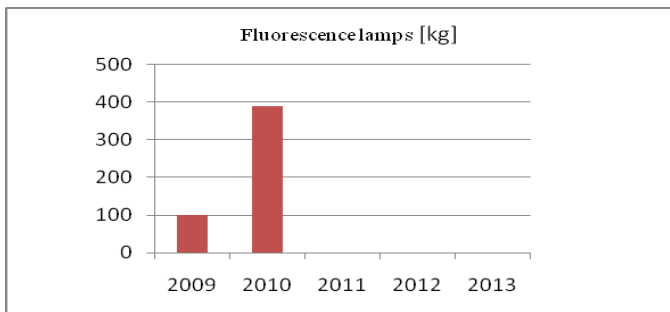
There are also other solid hazardous waste ex. rags, oil filters etc. are collected and send for recycling or elimination. The following table includes different amounts of hazardous waste.



FLUORESCENCE LAMPS

AKTOR in promoting sustainable development strategy promotes the use of fluorescent lamps / energy saving, at worksites and projects that maintain and operate. Also helps to recycle the bulbs, with their collection in appropriate containers from the incumbent management (APPLIANCES RECYCLING) at the local collection points.

In this effort what is important is the implementation of relevant guidelines and procedures for environmental management of waste, electrical waste that ensure compliance with the legal framework governing the electrical and electronic waste (L. 2939/01, EMD 117/2004 and 15/2006).



This effort is consistent with improving environmental conscience and awareness of the employees. Information and awareness of the reality wants to carry lamps for aggravating the environmental components (mercury, fluorescent powder) on the other made of valuable recyclable materials (glass, metals), is crucial for improvement in this environmental indicator.

A comparison of the amounts collected proves its upward trend. In this way the company records the effective contribution to a cleaner environment characterized by savings in energy consumption and recycling materials.

OVERALL TABLE OF WASTES 2002-2010

ENVIRONMENTAL PERFORMANCE 2002-2010	QUANTITIES	UNITS	MANAGEMENT METHODS
Paper	290	tn	Collection and delivery for recycling
Toner, ink cartridges	2.246	Pieces	Collection and delivery for reuse
Used oils	540	tn	Collection and delivery for regeneration
Packing bins of used oils	1.861	Pieces	Collection and delivery for recycling
Old batteries	85	tn	Collection and delivery for recycling
Electric and electronic equipment waste	31.845	kg	Collection and delivery for recycling
Old metals (scrap)	4.800	tn	Collection and delivery for recycling
Tires	4.808	Pieces	Collection and delivery for recycling
End-of-life vehicles	42	Pieces	Delivery for alternative management
Liquid - solid waste	6.045	kg	Receiving and management of the liquid waste by the supplier
Fluorescence lamps	488	kg	Collection and delivery for recycling

OTHER TYPES OF WASTE MANAGEMENT

The foam substance, resulting from the Center Wastewater Treatment Psitalia (CWTP), sent for eliminate to AVG Germany through ENVIROCHEM HELLAS.

Hazardous waste of worksites gathered regular, non annual, internal in the Center Equipment AKTOR – Magoula and sent aggregated for management in POLYECO.

Excavation and demolition products recorded aiming to the performance of such information to the authorities concerned.

Worksites plastic and cables are sent for recycling.

TABLE OTHER TYPES OF WASTE MANAGEMENT		
TYPE OF WASTE	QUANTITIES 2009	QUANTITIES 2010
FOAM SUBSTANCE	9.940 kg	27.090 kg
DANGEROUS CONSTRUCTION WASTE	24.400 kg	-
EXCAVATION PRODUCTS	1.508.000 m3	909.980 m3
DEMOLITION PRODUCTS	1.700 m3	6.710 m3
CABLES	-	800 kg
PLASTIC	-	1.260 kg

GREEN FORMULATION

SUBJECT	Green surface	Trees	Shrubs	Earthworks	Irrigation systems
QUANTITIES 2010	144.979 m2	32.388 τεμ.	177.207 τεμ.	35.465 m3	501.700 m

RECYCLING AND ENVIRONMENTAL BENEFITS

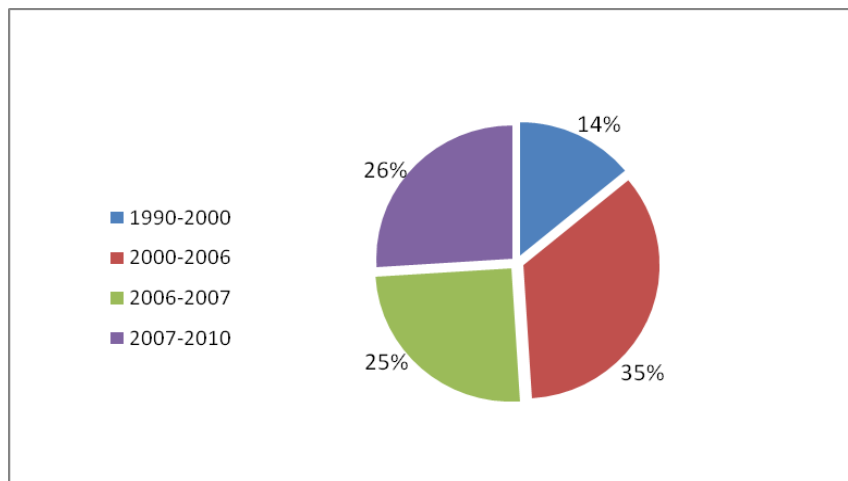
According to international estimation (source www.ecorec.gr) of the waste management benefits emerges that:

- by recycling 1 tn of paper saves 17 trees and 48.380 liters of water. AKTOR from the begging (2002) with the implementation of the environmental management (EMS) and recycling materials has saved 290.000 kg of paper and therefore has protected – saved more than 4.900 trees, has saved about 14.000 tn of water because of the recycling paper.
- Recycling 1 kg of scrap metals saves 4 kg of chemicals and 14 KWh energy. AKTOR based on the recycling of 4.800.000 kg scrap metals saved 19.200.000 kg of chemicals and 67.200.000 kWh energy totally from 2002 till now.

ANTIPOLLUTION TECHNOLOGY EQUIPMENT

In the context of the broad development strategy, as well as its environmental-friendly orientation, AKTOR has proceeded in the gradual renewal of its construction mechanical equipment.

In this context the equipment during the period 1990-2000 has been decreased (due to withdrawal and reuse) and the opposite number of 2007-2010 has been increased due to new equipment purchasing especially until 2009.



AKTOR has invested 3.000.000,0 € in a new, environmentally friendly, high quality technology for substructure projects, which is being used for applying the asphalt roadway and for recycling – reusing old asphalted, thus saving valuable natural resources and energy . This new generation equipment includes the company's new asphalt mixers with motor EURO 5- this technology outmatches the minimum 2008 requirements of the law - as well as the renewal of the fleet of vehicles and pick-up cars, with a percentage greater than 50% etc.

AKTOR consumed in 2009 and 2010 for the operation of vehicles and worksites about 2 million liters of gasoline fuels and 22 million liters of diesel fuel per year.

INFORMATION, AWARENESS AND TRAINING OF THE PERSONNEL

Despite the decrease of the construction activity, it is important to notice that an improvement of the interest of the personnel is observed in the protection of the environment. This is accomplished mainly through the continuous effort of awareness and training of the employees in all the chain of command of the company.

Training seminar cycles are organized in the company, while all internal audits are accompanied by awareness and training of the worksite engineers on issues and developments regarding environment, health and safety.

Thus in the period of June 2008 – May 2010, more than 50 engineers and personnel of AKTOR were informed and trained (seminars – meetings) for subjects about the environment, organization and management, while the employees are informed by these trained engineers on a daily basis, at the worksites and at other working areas.

ENVIRONMENTAL PERFORMANCE AND LEGAL REQUIREMENTS

The environmental impacts from the construction activity are directly dependant on the type of project and the construction methods.

Thus, for example, in a port project there could be significant impacts on the sea environment, while a building project, which is constructed inside an urban area, has mainly social nuisances from the operation of the worksite.

Approved environmental terms exist for the construction of each project, which are issued according to the legislation aiming at the protection of the immediate and broader environment, in which each project is implemented.

Therefore, the compliance with the environmental terms during the projects implementation equals with legal compliance, while resulting in the environmental performance of each project.

Thus the observances of environmental conditions during the execution of works means legislative compliance, and lead the environmental performance of each project, quantified or not. Moreover, compliance with legislative requirements and compliance with legislation are a commitment for the Management of AKTOR and a basic axis of its environmental policy.

AKTOR possesses a special in-house electronic webpage for the environmental legislation concerning the construction activity, as well as the other activities of the company. This webpage is accessible by the personnel, the worksites, the affiliated companies of AKTOR, ELLAKTOR Group and its subsidiaries.

GREENBUILDING PROGRAM FOR ENERGY EFFICIENCY OF BUILDINGS

According to investigations by the European Commission, the building sector is recognized as the scope for making significant improvement in energy performance. The building sector is assigned according to the same surveys, over 40% of total energy requirements of the European Union.

For these reasons came into effect in 2006, the European GreenBuilding voluntary program through the Green Paper on Energy Efficiency. The program sets framework GreenBuilding actions to improve the energy efficiency of buildings.

The ultimate goal of the program is to promote and implement energy technologies oriented to "green" applications relating to economic efficiency. In addition to the organizations undertake to implement the requirements GreenBuilding provided informational support, public recognition and visibility to an example for the wider abortion of energy efficiency measures.



AKTOR, in the philosophy of promoting sustainable development implemented the GreenBuilding program requirements in the new offices of the Group from the construction phase. These actions contribute to energy saving in buildings and the classification of AKTOR category GreenBuilding Partner. AKTOR promotes with responsibility the principles of sustainable development in construction and in particular the GreenBuilding program to interested parties.



ENERGY IDENTITY OF BUILDINGS

ACTION	ENERGY SAVING KWh/year
Water cooled chillers of high performance	113.795
Artificial lighting – using T5 lamps and electronic ballasts	276.805
Pumps – full inverter controller	8.136
Underground garage ventilation – system for measuring and controlling the air quality, according to pollution levels	44.932
BEMS – controlling the operation of HVAC, façade shading, etc.	387.000
Passive systems: Atrium 200m ² , the automatically controlled shading system, low e glass, low U- values, etc.	150.000
ENERGY SAVING 980.669 KWh/year	

COST	BENEFITS
Actions [number]	7
Cost of investment [€]	585.000
Energy savings [kWh/year]	980.669
Energy efficiency [%]	26,4
Annual energy benefit [€]	98.670
Simple payback [years]	6

ENERGY CONSUMPTION 2009	Consumption / year	
	2009	2010
Heating (electrical energy)	63.386 kwhe	12.022 kwhe
Heating (heat energy)	523.035 kwth	608.989 kwth
Cooling	453.043 kwhe	364.550 kwhe
Electric energy	3.255.840 kwhe	2.755.185 kwhe
Total primary energy consumption	9.991.124 kwh	8.629.474 kwh
Total water consumption	14.700 m ³	11.965 m ³

Reducing emissions CO₂ : 1.365 tn (around / year)

(source conversion: Greenhouse Protocol Initiative – GPI Protocol
1 kwh = 1,002533 kg GHG CO₂ / kwh)



View Metro Station: Ag. Antonios

8. ENVIRONMENT AND CORPORATE SOCIAL RESPONSIBILITY

AKTOR has implemented significant programs that contribute to the environment and the society in the broader framework of its Corporate Social Responsibility.

The actions that have been implemented are:

- Protection of the environment with the implementation, certification and continuous improvement of the Environmental Management System according to EMAS and ISO 14001:2004
- Protection of the employees with the implementation, certification and continuous improvement of the Occupational Health and Safety Management System according to OHSAS 18001
- Sponsoring the organization of the international exhibition and conference of TEE
- Donation of computers to financially weak organizations
- Financial support of sport activities and promotion of sports through the employees
- Donations to municipalities where projects are implemented, such as concrete paving of roads, upgrading squares, etc.
- Support of the public authorities with provision of equipment and personnel in emergencies, such as fires, flooding, snow etc
- Creation of a blood bank for the employees and their families.
(more information in Sustainability Report 2009)

AKTOR is a member of the UN Global Compact (GC), local Network, for Corporate Social Responsibility and contributes with the elaboration of reports of Sustainability Reports, along with ELLAKTOR group, according to the principles of GRI (Global Reporting Initiative) G3.

The ten basic principles of UN Global Compact, which AKTOR adopts, are:

- ✓ Support and respect the protection of internationally proclaimed human rights
- ✓ Not being complicit in human rights abuses
- ✓ Uphold the freedom of association and the effective recognition of the right to collective bargaining
- ✓ Elimination of all forms of forced and compulsory labour
- ✓ Effective abolition of child labour
- ✓ The elimination of discrimination in respect of employment and occupation
- ✓ Support a precautionary approach to environmental challenges
- ✓ Undertake initiatives to promote greater environmental responsibility
- ✓ Encourage the development and diffusion of environmentally friendly technologies
- ✓ Work against corruption in all its forms, including extortion and bribery.

9. AKTOR ENVIRONMENTAL AWARD

AKTOR in 2009 participated in the third (as in the previous two) Greek Competition Award for the Environment, held in Greece in line with the European Business Awards for the Environment organized in all Member States of the European Union.

These awards are a European practice since 1987 and aim at recognizing and nominating corporate environmental practices in protecting the environment as well as raising awareness of businesses in environmental issues.

Under the 2009 contest, AKTOR presented an Integrated Sustainable Development Strategy and won the First Prize for the environmental management by the company in manufacturing, while maintaining the advantages of environmentally friendly businesses in the construction of Greece. AKTOR aims with all the transition from the stage to "sustainable construction", a work beneficial to the environment, society and economic prosperity.



Aesthetic intervention on the landscape –Ymmitos

10. VALIDATION OF ENVIRONMENTAL STATEMENT

After on-site audits, which have been implemented in both Headquarters and worksites, representational of the construction sectors in which AKTOR is activated, and after having checked all relevant data and information, I verify that:

The Environmental Policy, the Environmental Program, the Environmental Management System, the Environmental Statement and the Environmental Performance of the company «AKTOR S.A.» with headquarters in 25, Ermou street, P.C. 14564, Kifisia, Athens, Greece, fulfils the requirements of the European Regulation EC 1221/2009 of the European Parliament and of the Council of 25th November 2009 for the voluntary participation by organisations in the Community Eco-Management and Audit Scheme (EMAS III).

AKTOR's Environmental Management System according to EMAS is implemented at the Central Offices and to the construction sectors: Road, building, tunnel and pipe, port, hydraulic, electromechanical and energy projects, self-financed projects and landscape restoration projects.

The sites that have been audited are:

Audited worksite – project	Activity	Audit	Status of Projects
Main offices of AKTOR : Athens	Company management	2004, 2005, 2006, 2007, 2008,2010	In progress
Mechanical Equipment Maintenance Center of AKTOR: Magoula Attica	Equipment maintenance	2004, 2005, 2006, 2007, 2008,2009,2010	In progress
ATTIKO METRO, Votanikos worksite – Line 3	Tunnel construction	2004, 2005	Completed
ATTIKO METRO, Agios Antonios worksite – Line 3	Electromechanical project	2004	Completed
ATTIKO METRO, worksite – Line 3 Ag. Dimitrios – Elliniko - Kriezidaki	Construction of tunnels, embarkation stations, terminal stations, electromechanical etc	2007, 2008,2010	In progress
PATHE Highway, worksite Agios Konstantinos	Road, tunnels	2004, 2005	Completed
Lamia Hospital worksite	Building project	2004	Completed
“Meizonos Ellinismou” worksite	Building project	2005	Completed
New museum of Acropolis worksite	Building project	2006	Completed
EGNATIA Highway, worksite Beroia – Asomaton	Road, tunnels, bridges, electromechanical	2006	Completed
EGNATIA worksites: Peristeri, Anilio	Road, technical works, electromechanical project	2007	Completed
EGNATIA worksites: Anilio / Metsovo bridge	Road, tunnels, bridges, electromechanical project	2007	Completed
POTA ROMANOU worksite - PYLOS	Building project	2007,2009	Completed
Concession Project: MOREAS JOINT VENTURE	Korinthos - Tripoli-Kalamata - Sparti	2008	In progress
Worksite: MALIAKOS-KLEIDI	Road, tunnels, electromechanical project	2009	In progress
Worksite: Eleusina - Patra	Road, tunnels, electromechanical project	2010	In progress

The information that is stated in this present Environmental Statement is clear and accurate, the Environmental Aspects of the audited projects have been identified and the relevant Environmental Impacts have been evaluated.

11. DECLARATION OF ENVIRONMENTAL VERIFIER

The Dr. Chem. Engineer Panagiotis Ahladas/TÜV HELLAS S.A., with Reg. number of environmental verifier EMAS 183-3 accredited or licensed for the scope: 7 (with exception 7.21), 8.1, 8.91, 10, 11, 13, 14.3, 16, 18.1, 19, 20 (partially 20.59), 21, 22, 23, 24 (with exception 24.46), 25 (with exception 25.61 and 25.99), 26.8, 27 (with exception 27.9), 28 (with exception 28.23, 28.29, 28.96 and 28.99), 31, 32,3, 36, 37, 38.1, 38.2, 38.32, 41, 42, 43, 45, 46 (with exception 46.52 and 46.65), 47, 49.42, 49.5, 52, 53, 55, 56, 58.1, 59.2, 61, 77.32, 79, 84.11, 85, 95.2, 96 with exception 96.09), I declare that I verified the activities of AKTOR mentioned in this environmental statement registered as No. EL 000012, in the headquarters and active worksites mentioned in the nonce Environmental Statement meets all the requirements of Regulation (EC) No. 1221/2009 of the European Parliament and the Council of 25 November 2009, on the voluntary participation of organizations in a community eco-management and audit scheme (EMAS).

Signing this notice, I declare the following:

- verification and validation performed in accordance with the requirements of Regulation (EC) No. 1221/2009,
- verification and validation confirms that no evidence of non-compliance with applicable legal requirements regarding the environment,
- data and information contained in this environmental statement for the organization and site provide valid, reliable and accurate picture of the committed field within the headquarters and worksites referred to in this environmental statement.

Athens: 24.01.2011

Dr. Chem. Engineer Panagiotis Ahladas
TÜV HELLAS S.A. El. Venizelou Str 24,
15341, Ag. Paraskevi

12. INFORMATIONS ON REGISTRATION

(information to be provided when applicable)

1. ORGANIZATION	
Name	AKTOR S.A.
Address	25 Ermou Str
Town	Kifisia - Athens
Postal code	145 64
Country / Land / Region / Autonomous Community	GREECE
Contact person	Dr. – Ing Niki Siouta Director of Sustainable Department
Telephone	210-8184444
FAX	210-8184956
E-mail	nsiouta@aktor.gr
Website	www.aktor.gr
Public access to the environmental statement or the updated environmental statement	-
a) printed form	-
b) electronic form	YES
Registration number	EL 000012
Registration date	27.06.2005
Suspension date of registration	-
Deletion date of registration	-
Date of the next environmental statement	-
Date of the next updated environmental statement	JAN. 2012
Request for derogation pursuant to Article 7 YES - NO	NO
NACE Code of activities	41, 42 , 43
Number of Employees	AKTOR : 2.013 , J/ V: 1.273
Turnover or annual balance sheet	672 mil. €
2. SITE	
Name	Headquarters and active worksites
Address	
Postal code	
Town	
Country / Land / Region / Autonomous Community	
Contact person	
Telephone	
FAX	

E-mail	
Website	
Public access to the environmental statement or the updated environmental statement	
a) printed form	
b) electronic form	
Registration number	
Registration date	
Suspension date of registration	
Deletion date of registration	
Date of the next environmental statement	
Date of the next updated environmental statement	
Request for derogation pursuant to Article 7 YES - NO	NO
NACE Code of activities	
Number of Employees	
Turnover or annual balance sheet	
3. ENVIRONMENTAL VERIFIER	
Name of the environmental verifier	Dr. Chem. Engineer Panagiotis Ahladas TÜV HELLAS S.A.
Address	El. Venizelou 24
Town	Ag. Paraskeui
Postal code	15341
Country / Land / Region / Autonomous Community	GREECE
Telephone	210 6540195
FAX	2106528025
Website	www.tuvhellas.gr
Registration number of accreditation or licensing	183-3
Scope of accreditation or licensing (Code NACE)	7 (with exception 7.21), 8.1, 8.91, 10, 11, 13, 14.3, 16, 18.1, 19, 20 (partially 20.59), 21, 22, 23, 24 (with exception 24.46), 25 (with exception 25.61 and 25.99), 26.8, 27 (with exception 27.9), 28 (with exception 28.23, 28.29, 28.96 and 28.99), 31, 32,3, 36, 37, 38.1, 38.2, 38.32, 41, 42, 43, 45, 46 (with exception 46.52 and 46.65), 47, 49.42, 49.5, 52, 53, 55, 56, 58.1, 59.2, 61, 77.32, 79, 84.11, 85, 95.2, 96 (with exception 96.09)
Accreditation or Licensing body	ΕΣΥΔ
Done at ATHENS on 24.01.2011	Dr. – Ing. Niki Siouta
Signature of the representative of the organization	

