Environmental Statement

2023

VOLUNTARY ENVIRONMENTAL STATEMENT

ACCORDING TO EUROPEAN REGULATIONS

1221/2009 EMAS (Eco-Management and Audit Scheme)

(EU) 2017/1505 (amending Annexes of 1221/2009/EC)

(EU) 2018/2026 (amending of annex IV of 1221/2009/EC)

MAY 2024

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Management Message

It is with utmost pleasure to preface 2023 edition of the Environmental Statement of MOTOR OIL, prepared in accordance with the European Regulations 1221/2009/EC, (EU) 1505/2017 and (EU) 2018/2026, for EMAS (Eco Management and Audit Scheme) Environmental Management System.

At MOTOR OIL, as a leading energy group, we recognize our responsibility, as well as the importance of our commitment to lead towards a sustainable future. Within this context, we have adapted our strategic planning to a sustainable development, actively contributing to the protection of the planet and addressing climate change through investments in alternative fuel technologies, in renewable energy sources, in the development of low-carbon hydrogen infrastructure, in the implementation of carbon capture and storage projects and in the development and implementation of circular economy solutions.

Moreover, it shall be noted that at MOTOR OIL we recognize the importance of balanced development of the economic, social, and environmental aspects of the business, with emphasis on the triptych "Society - Environment - Economy". We strongly consider that creating value for our shareholders must be accompanied by caring for society, employees, partners, and the environment. On the pillars of Society and Corporate Governance, MOTOR OIL Group has trained and has raised the awareness of more than 11,500 employees and contractors on Health & Safety issues.

Following the implementation of Environmental and Energy Management Systems MOTOR OIL has implemented a substantial number of investments to improve environmental and energy performance. The results of this endeavor are illustrated in the diagrams presented in this Environmental Statement. A significant improvement in performance has been achieved.

Indicatively, the following critical indicators are mentioned:

- carbon dioxide emissions per unit of product, have been reduced from 0.192 in 2012, to 0.171 MT / MT in 2023.
- the quantity of treated wastewater per unit of product, has been reduced from 0.393 in 2012, to 0.312 m^3 / MT in 2023.

MOTOR OIL's dedication to the following commitments is reconfirmed by:

- Full compliance with the requirements of relevant Greek and European legislation
- Investing significant amounts in environmental protection, pollution prevention, and implementation of environmentally sound business practices.

- Integration of methods, procedures and strict modern international standards and technologies (Best Available Techniques) to protect the environment.
- Design and implementation of programs to improve environmental and energy performance, aiming at the optimal management of natural resources, energy conservation, more efficient management of all by-products from the production activity and continuous control of environmental parameters related to the operation of the Refinery.
- Identification and evaluation of environmental impact throughout the production stages according to determined criteria including legislative requirements and stakeholders' point of view.

In this Environmental Statement, you may find information about the Refinery's production processes, our policy on the management of our Environmental Footprint, an assessment of our Environmental Performance over the past years up to 2023, as well as our new targets.

The implementation of measures for environmental protection and continuous vigilance for the health and safety of employees constitute the highest commitment and duty for the Refinery Management team.

This Environmental Statement aims not only to provide information but also to create a channel of communication with all stakeholders regarding the company's actions and objectives.

It is our pleasure to receive your comments, as well as any questions or clarifications requested.

I. Kioufis

Refinery General Manager

1. COMPANY PRESENTATION

1.1 General Information

MOTOR OIL is a leading Company in the oil refining industry supplying its customers with a wide range of high quality products. The Company has evolved to one of the main pillars of the national economy, while, at the same time, it maintains and expands its key role in the wider area of South Eastern Europe.

MOTOR OIL started operating in 1972 as a company engaged in refining and trading of oil products and has been responsibly functioning ever since, aiming at sustainable profitability and socially responsible growth. The Company's Vision and Mission define the context which drives the planning and implementation of its dynamic growth. In addition, company operation is based on a set of strict Principles and Values, which comprise the constituent elements of its business practices.

MOTOR OIL's Vision and Mission are based on three basic principles:

- Respect for our Employees
- Respect for the Environment
- Transparency

Materializing the Corporate Vision and Mission is based on three corporate values:

- Integrity
- Effectiveness
- Social Accountability

It should be noted that MOTOR OIL Group, beyond its activity as a refining and petroleum products trading company, in the recent years it has expanded its activity into Renewable Energy Sources, operating wind and photovoltaic parks, as well as in the sector of circular economy and particularly in the management of solid materials and waste.

Regarding the Company's Refinery, it is located in Agioi Theodoroi, Corinth, approximately 70 km from the center of Athens, covering a total area of 1,557.26 acres, as depicted by a detailed topographical survey (Biodiversity Index). Along with its auxiliary premises and its fuel distribution premises, the Refinery constitutes the largest private

industrial complex in Greece and is considered as one of the most modern and flexible refineries across Europe, with Nelson Complexity Index of 12.61.

It can process different types of crude oil, producing a wide spectrum of oil products that meet the strictest international standards, which makes it able to serve the supply requirements of large customers both in Greece and abroad.

At the same time, it is the only Refinery in Greece that has a lubricants production complex. Apart from the basic units, (atmospheric distillation, catalytic reforming and hydrotreating) the refinery includes conversion units as well (thermal, catalytic cracking, and hydrocracking).

The industrial plant of the Company has an operating license which has been granted by Y.P.A.N (Hellenic Republic Ministry of Development / Department of Energy / Department of Oil Installations / section A: D.3/A/6841 – 16.08.2007, while for the Atmospheric Distillation unit U-7100 the operating license is granted by ΥΠΕΚΑ – Ministry of Environment, Energy & Climate Change/Department of energy and climate change / Department of Oil Installations / section A: D.3/A./14094, date 12-11-2010).
The Environmental permit of the refinery according to the Approved Environmental Terms as described in the decision of Ministry of Environment and Energy/ DIPA/ 63069/ 3774/01-07-2020, ΑΔΑ : 9Ω6Π4653Π8-ΔΗΛ and amended by the decisions of Ministry of Environment and Energy/ DIPA /36103/2502/14-04-2021 ,ΑΔΑ: Ψ3ΛΠ4653Π8-037, DIPA /25072/1621/04-04-2022, ΑΔΑ: ΨΣΖΩ4653Π8-Χ1Η, DIPA /40204/2869/05-05-2022, ΑΔΑ: ΨΒΓ24653Π8-ΕΛΙ, DIPA /99490/6746/09.12.2022, ΑΔΑ: ΨΑΜΘ4653Π8-4ΟΡ, DIPA/41003/2849/12.04.2023 ΑΔΑ: 6Α0Ψ4653Π8-Ζ52, DIPA/67759/ 4490/24.07.2023 ΑΔΑ: Ψ5ΟΥ4653Π8-Ρ7Γ and DIPA/94624/6221/23.11.2023 ΑΔΑ: 9ΚΟΙ4653Π8-2ΟΩ fully complies with the European and Greek legislation and is governed by the integrated prevention and control of emissions to air, water ,soil, waste management, energy efficiency and accident prevention in normal and abnormal operation by the use of Best Available Techniques and modern operating methods.

Also, the Refinery has a Greenhouse Gases Emissions license (Ministry of Environment and Energy/ DKAPA/114882/2219 – 30/11/2020) for the period 2021-2030, which is accompanied with the approved emissions monitoring plan (Ministry of Environment and Energy /DKAPA/104307/1875 date 17-12-2020), and the last approval of the monitoring plan MEP/DKAPA/25135/456/22-06-2023.

The refinery's current licenses are listed below, with reference to the expiration date of the respective license.

#	Legal Document	Protocol Number	Expiration Date
1	Operating license for Industrial Installations	D3/A/6841 – date. 16.08.2007	indefinite duration
2	Operating license for atmospheric distillation unit M-7100	D3/A/14094 - date. 12.11.2010	indefinite duration
3	Decision on the Approved Environmental Terms (and its amendments)	63069/3774 – date. 01.07.2020	01.07.2035
4	Greenhouse Gas Emissions Permit (GHG emissions)	114882/2219 – date. 30.11.2020	31.12.2030

The following table summarizes the company data.

Statistical Codification of Economic Activity:	232
NACE Code	DF.19.20 - Manufacture of refined petroleum products
Premises:	Agioi Theodoroi, Corinth
Installed Power :	Main electric motors power 99.86 MW Back up electric motors power 58.51 MW Thermal Power (Steam, Engines internal combustion) 50.43 MW
Postal Address :	71st km of Old National Road Athens – Corinth, position «Soussaki»
Contact Person for EMAS and Integrated Management System	S. J. Sofos
Telephone number :	(+30) 27410-48602
Fax:	(+30) 27410-48255
E-mail:	sofossp@moh.gr
Environment & Energy Optimization Section Head	Zouridaki Eleni

Vardinoyannis Group is the major shareholder of MOTOR OIL. In 2001 the Company listed its shares on the Athens Exchange following a share capital increase by the means of an Initial Public Offering (IPO).

The following table shows the Company's shareholder structure (shareholders with a stake in excess of 5% and the Treasury Stock portfolio) as of 31.12.2023.

SHAREHOLDERS	%
PETROVENTURE HOLDINGS LIMITED	40.00
MOTOR OIL HOLDINGS LTD*	0.97
Treasury Stock	2.25
Free Float	56.78
TOTAL	100.00

(*) MOTOR OIL HOLDINGS LTD is the controlling shareholder of Petroventure Holdings Limited.

1.2 Timeline of Company's Growth

MOTOR OIL commenced its operations in 1972 and since then took significant steps regarding the improvement, expansion and upgrading of the Company Refinery. These steps are concisely presented in the following chronological table.

1972	Foundation and beginning of operation of the refinery comprised of a crude oil refining unit, a base lubricants production unit and port facilities.
1975	Construction of an Atmospheric Distillation Unit, with a capacity of 100,000 barrels/ day and tanks with a capacity of 1.5 million m^3.
1978	Construction of a Catalytic Reforming Unit (further processing of naphtha for gasoline production).
1980	Installation of a Fuel Catalytic Cracking Unit (processing of fuel oil into high added value products).
1984	Construction of a Power Plant that uses flue gas as raw material. License to sell electric power to the national grid.
1993	Quality Management System certification according to ISO 9002 standard, concerning all the activities of the Company
1996	Purchase of 50% of the Company's shares by Aramco Overseas Company BV, 100% subsidiary of Saudi Arabian Oil Company (Saudi Aramco). Relocation of Company Headquarters to a modern building in Marousi, Attica.
2000	Manufacture of products according to European Union standards for the year 2000, by constructing new units and converting the naphtha reformer to a continuous 103 octane reformation unit (CCR). New Central Control Room and installation of a Distributed Control System (DCS). Environmental Management System certification according to ISO 14001:1996 standard.
2001	Share capital increase by the means of an Initial Public Offering (IPO) and listing of Company shares on the Athens Exchange. Installation of

	the new gas turbine at the Power Plant. Upgrade of lubricants' vacuum unit.
2002	100% acquisition of AVIN OIL, a domestic retail marketing oil company
2003	Development of a Quality Management System according to ISO 9001:2000 standard, which was certified on January 2003
2004	Re-certification of the Environmental Management System according to ISO 14001:2004 for three more years. Beginning of operation of the Truck Loading Terminal at the Refinery.
2005	Beginning of operation of a Hydrocracker unit that enables the production of clean fuels according to 2005 and 2009 European Union specifications. Acquisition of the stake of Aramco Overseas Company B.V. in the Company by Motor Oil Holdings S.A.
2006	Re-certification according to ISO 9001:2000 for three more years (until 2009). Accreditation of the Refinery Laboratory according to ISO 17025:2005.
2007	Re-certification of the company Environmental Management System according to ISO 14001:2004, valid until 2010.
2008	Certification of the Occupational Health and Safety Management System according to OHSAS 18001:2007. Safe implementation of the largest in company history refinery shut down program for periodic maintenance work. Start of construction of the New Crude Distillation Unit. The non-governmental organization "Ecocity" awards our company, for the second consecutive year, the "OIKOPOLIS 2008 - Environmental Investment" prize
2009	Re-certification of the Integrated Management System according to the new ISO 9001:2008 standard, valid until 2012. At the same time some significant strategic initiatives were taken: Agreement with Shell International Petroleum Company for acquiring its downstream operations in Greece (except for Lubricants), start of

	the construction of the KORINTHOS POWER S.A. natural gas power plant, acquisition by MOTOR OIL Group of an additional 64.06% stake in OFC Aviation Fuel Services SA, with which the total Group share reached 92.06%.
2010	Beginning of operation of the new 60,000 barrels per day atmospheric distillation complex. Beginning of the installation of a fifth gas turbine at the Power Plant (17 MW natural gas unit). Re-accreditation of the Refinery Chemical Laboratory according to ISO 17025:2005, with validity until 2014. Re-certification of the Environmental Management System according to ISO 14001:2004 with validity until 2013. Successful completion of the acquisition of Shell downstream operations in Greece.
2011	Re-certification of the Occupational Health and Safety Management System according to OHSAS 18001:2007, valid until 2014. Certification CE marking of Bitumen and bituminous binders in accordance with European Directive 89/106/EEC Construction Products, as amended by 93/68/EEC and in accordance with the requirements of the European Standard EN 12591:2009. Completion of the construction of the fifth Gas Turbine unit (GT#5). With the addition of this Gas Turbine unit, the installed power of the Refinery Cogeneration Power Plant amounts to 85MW and ensures for the Refinery full energy self-sufficiency, due to the addition of CDU.
2012	Re-certification of the Integrated Management System according to ISO 9001:2008 standard, valid until 2015. Extending the scope of accreditation of the Refinery Chemical Laboratory according to ISO / IEC 17025:2005.
2013	CE Marking certification of Bitumen and bituminous binders, in accordance with the European Construction Products Directive 305/2011/EEC and the requirements of European Standard EN 12591:2009, valid until the year 2017.
2014	Re-certification of the Integrated Management System according to ISO 9001:2008 standard, of the Environmental Management System according to ISO 14001:2004, and of the Occupational Health and

	Safety Management System according to OHSAS 18001:2007, with validity until 2017. Re-accreditation of the Refinery Chemical Laboratory according to ISO 17025:2005, with validity until 2018. Completion of the acquisition of 100% of the share capital of the listed on the Athens Exchange company CYCLON HELLAS S.A. through a mandatory tender offer submitted by MOTOR OIL.
2015	Approval of the separation of activities of CYCLON HELLAS by the relevant Competent Authorities (Piraeus Chamber of Commerce & Industry). Transfer of the retail fuel business to AVIN OIL and of the lubricants & marketing business to the newly established L.P.C. S.A.
2016	By decision of the Annual Ordinary General Meeting of 8 June 2016, the participation of MOTOR OIL with a percentage of 65% in MOTOR OIL VEGAS UPSTREAM (MVU) LIMITED was approved. MVU engages in the exploration and production (E & P) of potential new oil resources (upsteam). MOTOR OIL has developed, implemented and maintains a Sustainability Management System of Biofuel that procures and markets in accordance with the 2BSvs standard. The System fully complies with the requirements of the standard and the applicable national legislation as established by the adoption of the European Directive 2009/28/EC (RED) as it was amended and is in force.
2017	During 2017, the MOTOR OIL Integrated Management System was re-certified according to the two revised standards, ISO 9001:2015 (Quality Management System) and ISO 14001:2015 (Environmental Management System). At the same time, the Refinery was certified according to two new standards, ISO 50001:2011 (Energy Management System) and ISO 18788: 2015 (Refinery Plant Security Management System).
2018	MOTOR OIL has achieved record sales (14.4 million MT) for an eleventh year running. Acquisition of 90% of the share capital of the electricity company NRG TRADING HOUSE ENERGY SA.

Within 2018, the refinery was audited, for the first time, by a certified Auditor in accordance with the requirements of the standard EI / JIG 1530, with successful results.

In addition, MOTOR OIL won the following awards:

INSTITUTION	CATEGORY	THEME	DISTINCTION
ENVIRONMENTAL AWARDS	Management of Hazardous and Medical waste	Contaminated soil treatment plant	GOLD
GREEK BUSINESS AWARDS FOR THE ENVIRONMENT (ΠΑΣΕΠΠΕ)	Organization and Administration for medium and large companies	Energy Management System according to standard ISO 50001	1st PRIZE

2019

MOTOR OIL Group entered the market of renewable energy with the acquisition of three (3) new, under construction, wind power plants with total power generation of 10 MW. The operation phase of these wind power plants began in 2020

2020

Establishment of MOTOR OIL presence in the renewable power generation with the acquisition of a portfolio of operating and under construction Solar and Wind power plants. The total energy output of the new portfolio is approximately 115 MW.

Certification of MOTOR OIL in accordance with the SAFEGUARD standard of Bureau Veritas. The control criteria of this certification concern the compliance and the performance of the Company to cope with the management of COVID – 19 and pandemics in general, including the compliance of existing procedures and Business Continuity Plans. With this certification it is confirmed that the Company complies with all existing regulatory measures concerning hygiene, heath as well as establishing good and safe practices for the reduction of the SARS-Cov–2 spread. MOTOR OIL is adapting and applying protective measures according to the pandemic spread, the local authorities, and the internal evaluation of risk.

Moreover, MOTOR OIL was certified in accordance with the ISO 45001:2018 for occupational health and safety to replace the

	corresponding certificate of OHSAS 18001 and also was certified according to the new upgraded standard ISO 50001: 2018 for the energy management.
2021	The Company in 2021 proceeded with two bond issuances of total 600 million € with particularly low interest rates confirming the shareholders' trust towards MOTOR OIL. Particularly in March 2021, through public offering the Company raised 200 million € by issuing a 7-year bond (till 2028) of 1.90% interest annually. The bonds entered the Athens Stock Exchange and have been traded since 24.03.2021. In July 2021 the Company issued a 400 million € face value Eurobond with a duration of 5 years (till 2026) and 2.125% interest annually. The bonds are traded in Global Exchange Market (GEM) of Euronext Dublin, the Irish Stock Exchange plc. At Group level, in 2021 further expansion of business activity in liquid fuel retail was met with success with the takeover, through its subsidiary CORAL, of 75% equity capital of APIOS D.O.O. headquartered in Croatia and has 27 gas stations and market share of approximately 3%. APIOS D.O.O has been renamed to CORAL CROATIA D.O.O. whereas its gas stations will operate under the SHELL trademark based on the contract agreement with SHELL BRANDS INTERNATIONAL B.V. Additionally, the Group, in 2021 through the subsidiary MOTOR OIL RENEWABLES ENERGY SINGLE MEMBER PC acquired 6 firms that possess a portfolio of eleven (11) operating wind parks with 220 MW capacity. Thereby, MOTOR OIL Group of Companies established its presence in the Renewable Energy Sources sector by providing in 31.12.2021 a portfolio of 280 MW capacity instead of 124 MW in 31.12.2020
2022	In May 2022 MOTOR OIL (HELLAS) S.A. acquired 29.87% of the share capital of the listed company ELLAKTOR S.A. for a total consideration amount of Euro 182 million. Following the above mentioned acquisition, the MOTOR OIL (HELLAS) S.A. subsidiary under the legal name MORE contributed the amount of

Euro 370 million becoming the majority shareholder with a 75% stake (the minority shareholder is ELLAKTOR S.A. with a 25% stake) in the company ANEMOS RES HOLDINGS S.A. which was founded in December 2022 and is in possession of a portfolio of operating wind parks of 493MW total capacity and additional RES projects of total capacity 1,616 MW in various licensing stages.

As a result of the above developments, the MOTOR OIL (HELLAS) S.A. Group, through its MORE subsidiary, has a portfolio of wind and photovoltaic parks in operation of total capacity 772 MW (compared to 280 MW at the end of 2021), while parks of 84MW capacity are under construction and the licensed capacity of the RES portfolio to be developed exceeds 2GW.

In December 2022 and in the context of the implemented strategy for revenue diversification, MOTOR OIL (HELLAS) S.A. completed the acquisition of all shares of the company VERD which owns a biodiesel production plant located at the B' Industrial area of Volos.

2023

In January 2023 MOTOR OIL and PPC establish the HELLENIC HYDROGEN S.A. The corporate objective of the said company is the development, operation and construction of infrastructure for the installation of green hydrogen electrolysis units in Greece including their supporting infrastructure as well as other related activities in relation to said projects including production, storage, commercial promotion and marketing of the green hydrogen produced by the said units. MOTOR OIL participates in HELLENIC HYDROGEN S.A. with a 51% stake having contributed as seed capital the amount of Euro 6,732,000.

In the second quarter of 2023 a revamping of the major topping unit takes place which leading to an increase of the MOTOR OIL Refinery throughput to 200,000 barrels per day (b/d) from 185,000 b/d previously.

In April 2023 the Group of MOTOR OIL expands its activities in the sector of Circular economy and in particular the solid waste treatment, water and liquid waste treatment having completed, through a

subsidiary company, the acquisition of the company under the legal name THALIS ENVIRONMENTAL SERVICES S.A.

In December 2023 the Group of MOTOR OIL, through its subsidiary MORE, submits an offer of Euro 123.5 million for the acquisition of the remaining 25% of the share capital of ANEMOS RES S.A. As a result of the said acquisition, the Group of MOTOR OIL, through MORE, achieves further penetration and consolidation in the Renewable Energy Sources (RES) Sector and manages a portfolio of wind and photovoltaic parks in full operation with a total capacity of 839 MW compared to 280 MW at the end of 2021, while there are significant prospects for expansion and development as MORE has a portfolio of licenses for development with a total capacity of 2.2 GW.

During 2023, MOTOR OIL was certified according to the following standards:

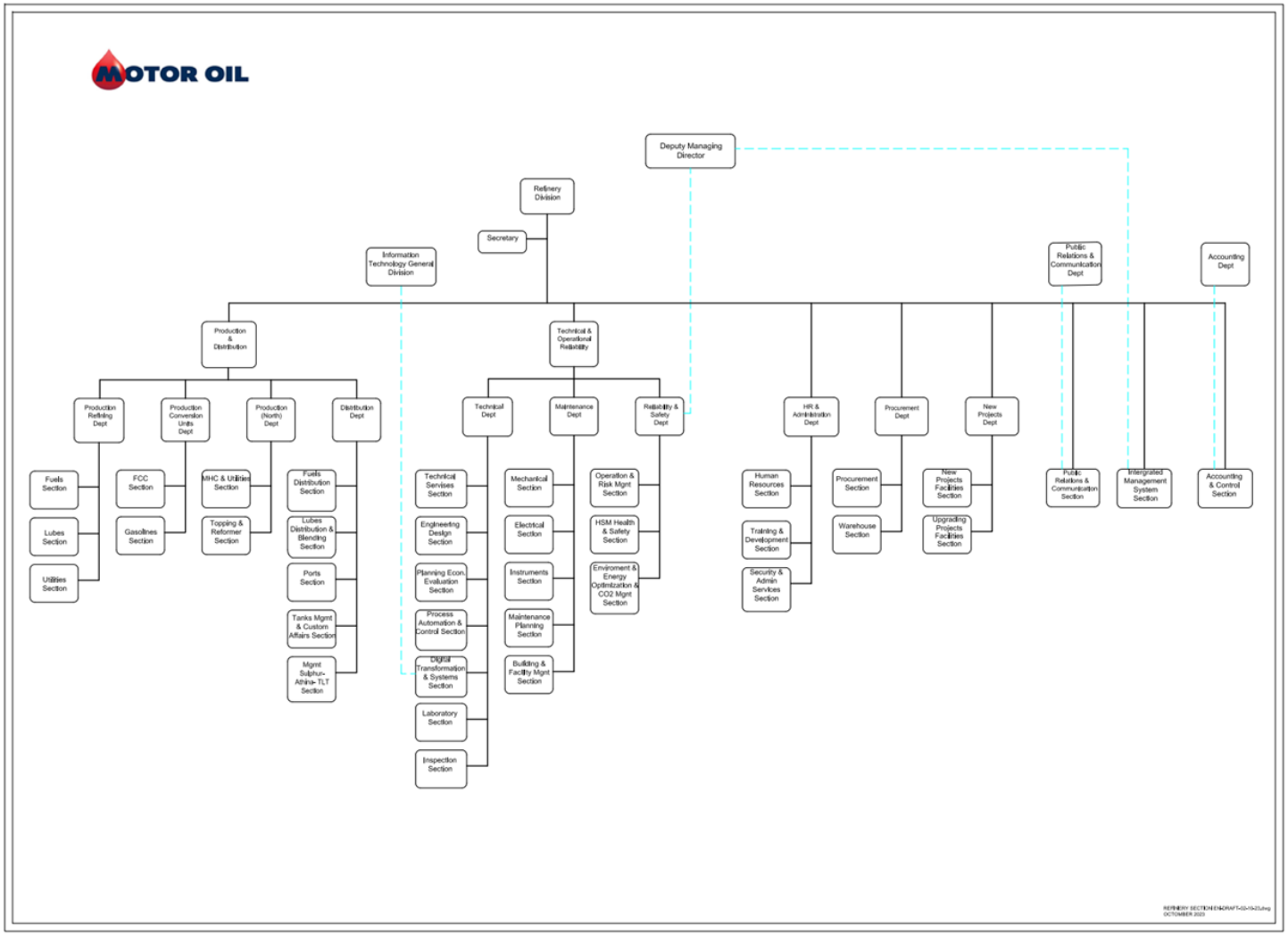
- ISO 22301:2019 (BCP) Business Continuity Management System, which is applied across the entire company and concerns the implementation, maintenance and improvement of the management system to protect, reduce the likelihood of occurrence, prepare, respond and recover from disruptions that may arise in the company.
- ISO/IEC 27001:2013 Information Security Management System, which is applied in the Company's Refinery and relates to the security of information systems, cybersecurity, and protection of personal data.

Additionally, MOTOR OIL was re-certified according to the following standards:

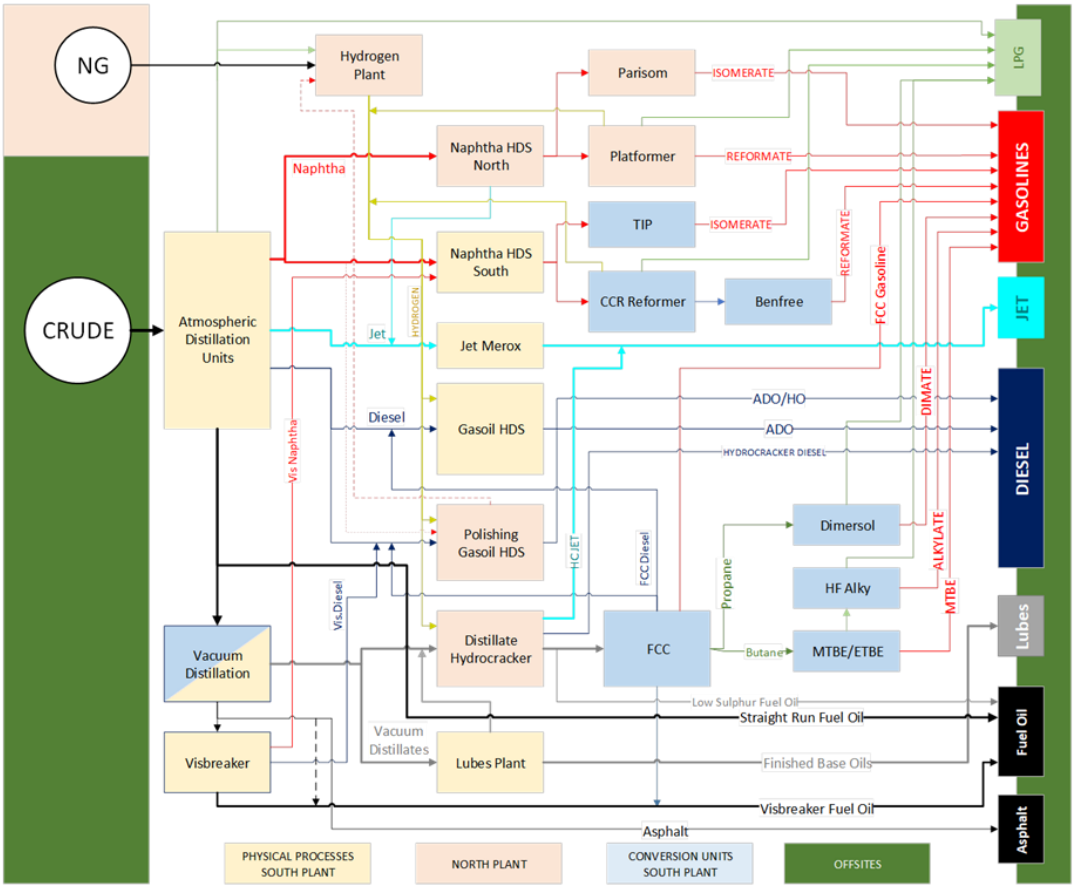
- ISO 50001:2018 Energy Management System
- ISO 18788:2015 Security Management System of the Refinery's facilities
- ISO 45001:2018 Occupational Health and Safety Management System
- ISO 14001:2015 Environmental Management System
- ISO 9001:2015 Quality Management System
- CE Marking according to EN 12591:2009 Bitumen and Bituminous Binders - Specifications for paving grade bitumens.

The certificates of the Management System implemented by the Refinery, according to the international standards, are attached to Appendix III of the present Environmental Statement.

1.3. Refinery’s Organization Chart



1.4 Refinery Process Flow Chart



Aerial view of the wider area of the Refinery

1.5 Activities – Products

MOTOR OIL Refinery processes several types of crude oil, producing a wide range of oil products that fulfill the strictest international specifications, which makes it able to serve the supply requirements of large customers both in Greece and abroad.

Products produced in the Refinery include:

FUELS	○ *Liquefied Petroleum Gas (LPG)* ○ *Naphtha* ○ *Gasoline* ○ *Jet fuels* ○ Biofuels ○ *Diesel Oil* ○ *Fuel Oil*
LUBRICANTS	○ *Base lubricants* ○ *Automotive lubricants* ○ *Gear Oils* ○ *Industrial lubricants* ○ *Marine lubricants*
OTHER PRODUCTS	○ *Asphalt* ○ *Paraffin* ○ *sulfur*

The annual production capacity of the main production units is as follows and is determined by the Approved Environmental Operating Terms – Nr. YPEN/DIPA/ 41003/2849 / 12.04.2023 (ΑΔΑ: 6Α0Ψ4653Π8-Ζ52):

Atmospheric Distillation Units	9,283,279 MT
Visbreaker	1,638,120 MT
Vacuum Distillation Unit/ Lubricants	1,511,100 MT
Heavy Hydrocarbons Desulphurization Unit	1,314,000 MT
Naphtha Desulphurization Units	1,741,462 MT
Naphtha Catalytic Reforming Units	1,056,065 MT
Benzene Hydrogenation Unit (Benfree unit)	444,815 MT
Vacuum Distillation Unit/ FCC	2,741,880 MT
Fluid Catalytic Cracking	1,533,600 MT
Mild Hydrocracker Unit	2,014,800 MT

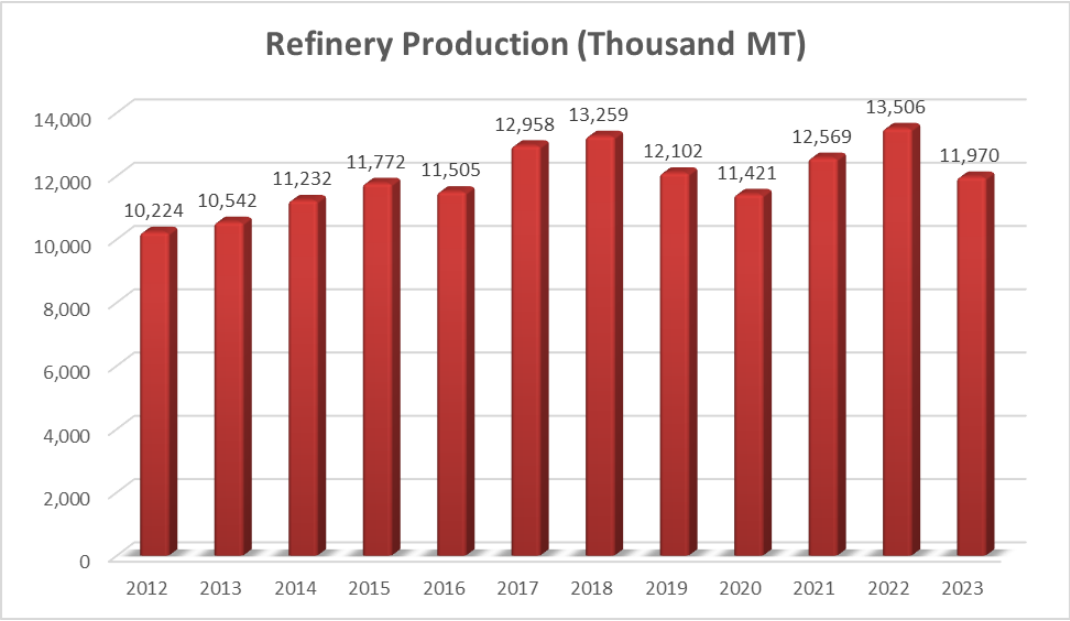
Storage and distribution premises include:

6 tanks for crude oil storage	*720,000 m^3*
134 tanks for intermediate and final product storage	*1,881,450 m^3*
Docks for tankers loading and unloading	
Pipelines for transferring raw materials and products	
Truck Loading Terminals	

During the last years, the sales volume of the Company's products shows a steady upward trend, apart from some of the recent years, due to the special circumstances prevailing, namely:

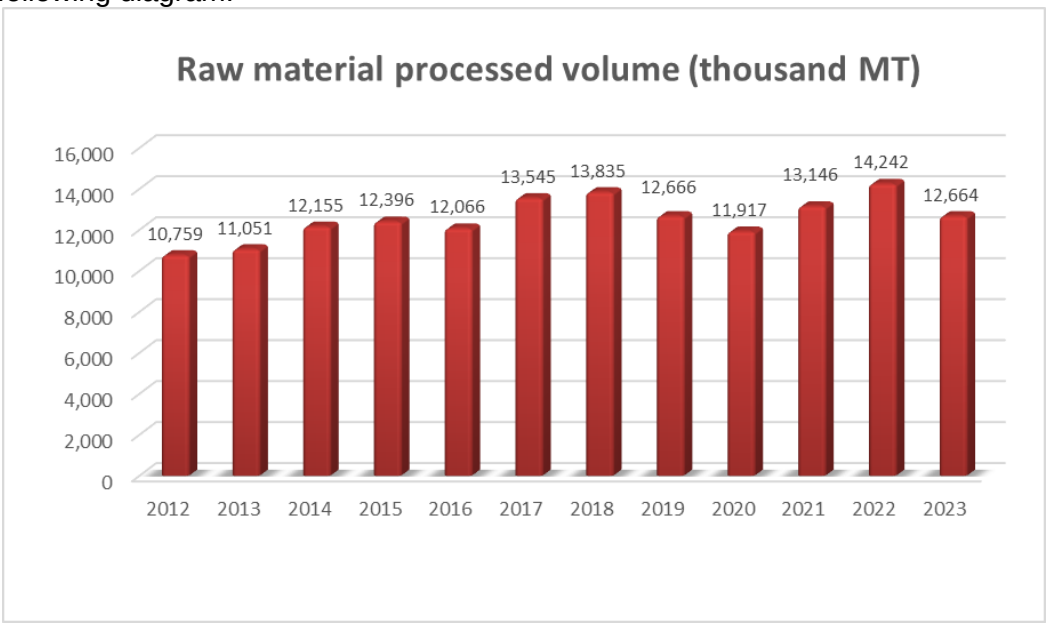
- in the year 2020 the decline in sales volume is due to the adverse conditions worldwide caused by the COVID-19 pandemic,
- in the year 2022 there was a slight decline in sales volume but remaining at the high levels of recent years, and
- in the year 2023 the decline in sales volume is due to the reduced refinery production, due to the need to implement extensive maintenance work, as part of a periodic maintenance program, which took place during the period May - July 2023 and involved almost all units of the refinery.

The total Refinery production volume for the years 2012 to 2023 is shown in the diagram below:



Similarly, the reduced refinery production for the year 2023 is reflected in the above diagram, due to the implementation of extensive maintenance work as part of a periodic maintenance program, which took place during the period May - July 2023 and involved almost all units of the refinery.

The amount of raw materials that the Company processed over the last years is shown in the following diagram:



2. ENVIRONMENTAL MANAGEMENT

2.1 Environmental and Energy Management System

MOTOR OIL has developed and implemented an Integrated Management System that includes:

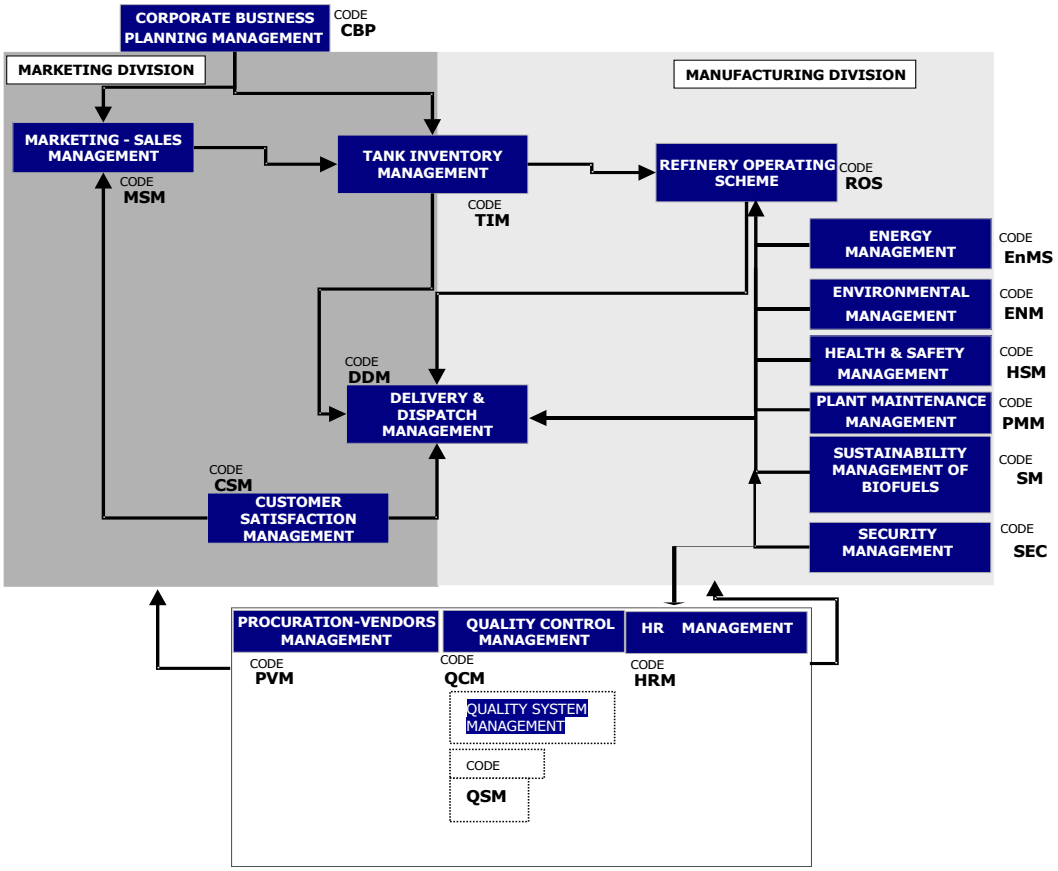
- Quality (according to the requirements of ISO 9001:2015 and ISO 17025:2017),
- Environment (according to the requirements of ISO 14001:2015),
- Energy (according to the requirements of ISO 50001:2018),
- Health and Safety (according to the requirements of ISO 45001:2018)
- Business continuity and recovery from disruptions (according to the requirements of ISO 22301:2019)
- Information system for security, cybersecurity, and personal data protection (according to the requirements of ISO 27001:2013)
- Security Management System for the Refinery (according to the requirements of ISO 18788:2015)
- CE mark certification for bitumen and bituminous binders according to the European Construction Products Directive 305/2011/EC and in accordance to the requirements of the European Standard EN 12591:2009
- Certification for biofuels production according to the 2BSvs standard
- Certification for aviation fuel production according to the revised standard EI/JIG 1530.

In regards with the pandemic of COVID–19 and the actions required by local authorities (NPHO – National Public Health Organization), MOTOR OIL (HELLAS) S.A. had developed and applied relevant instructions and for that MOTOR OIL has been certified by Bureau Veritas according to the SAFEGUARD standard. By this certification is confirmed that MOTOR OIL (HELLAS) S.A. complies with the regulatory requirements concerning hygiene and heath standards as well as with the best and safe practices, which help to mitigate the spread of the SARS- Cov-2 (the cause of the pandemic of COVID-19).

The scope of the management system concerns the manufacturing, trading and distribution of fuels, biofuels, lubricants, waxes, bitumens, sulphur and special mineral oil derivatives.

The Management System consists of a series of mutually interacting processes as it is depicted in the Interrelation Process Diagram, including the production processes, the critical processes as well as the supporting ones.

Integrated Management System: Interrelation Process Diagram



The explanation of the Integrated Management System acronym terms in the previous diagram of the Integrated Management System are given and categorized as follows:

Business Processes

CBP	Corporate Business Planning
MSM	Marketing Sales Management
TIM	Tank Inventory Management
ROS	Refinery Operating Scheme
DDM	Delivery & Dispatch Management
CSM	Customer Satisfaction Management

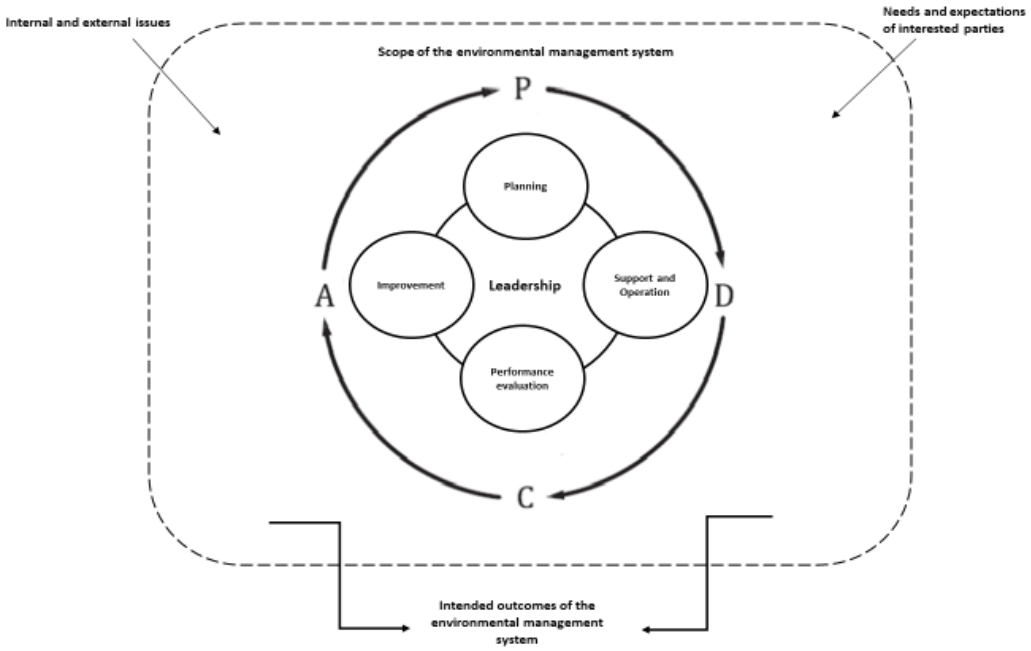
Supporting Processes

ENM	Environmental Management
HSM	Health & Safety Management
PMM	Plant Maintenance Management
PVM	Procurement Vendors Management
QCM	Quality Control Management
HRM	Human Resources Management

QSM	Quality System Management
EnMS	Energy Management
SM	Sustainability Management of Biofuels
SEC	Security Management

The Environmental and Energy Management System aims to comply with the current Greek and European legislation and to achieve the energy optimization and environmental impact minimization from the Refinery's operation

The System structure follows the steps of a dynamic cyclical process, as depicted in the following diagram.



MOTOR OIL's Environmental and Energy Management System includes the following levels of documentation:

- A Manual of the Integrated Management System, which constitutes a guide for the implementation, maintenance and improvement of the Environmental and Energy Management System.
- Procedures – Guidelines, which describe the sequence of actions and the assignment of responsibilities.
- Files – Forms and Documents.

One of the main points in planning and implementing the Environmental Management System, is the identification of environmental aspects and the evaluation of the environmental impacts.

The identification of the environmental aspects and the relevant impacts, is accomplished according to the procedure ‘’ENM-07 Identification and Evaluation of Environmental Impacts’’ by a wide group of company staff and executives, by the Refinery General Manager leadership. This wide group, also includes the Reliability and Safety Manager, the Environment & Energy Optimization Section Head, the Environmental Engineers as well as the Section Heads and the employee representatives, in order to ensure a multilateral approach to the identification and control of the environmental aspects.

The identification of the impacts is accomplished, based on the lifecycle approach of MOTOR OIL's products and services, through:

- Inspection of the Refinery process units and other premises
- Investigation of the environmental documentation (manuals, procedures, forms and archives)
- The regular / scheduled or unscheduled (as required) internal audits

The investigation of the environmental impacts takes into account the following:

- Current regulatory requirements and their modifications
- The opinion of stakeholders and related parties
- The operation of the Refinery under
  - ❖ normal conditions
  - ❖ irregular conditions
  - ❖ probable emergency conditions

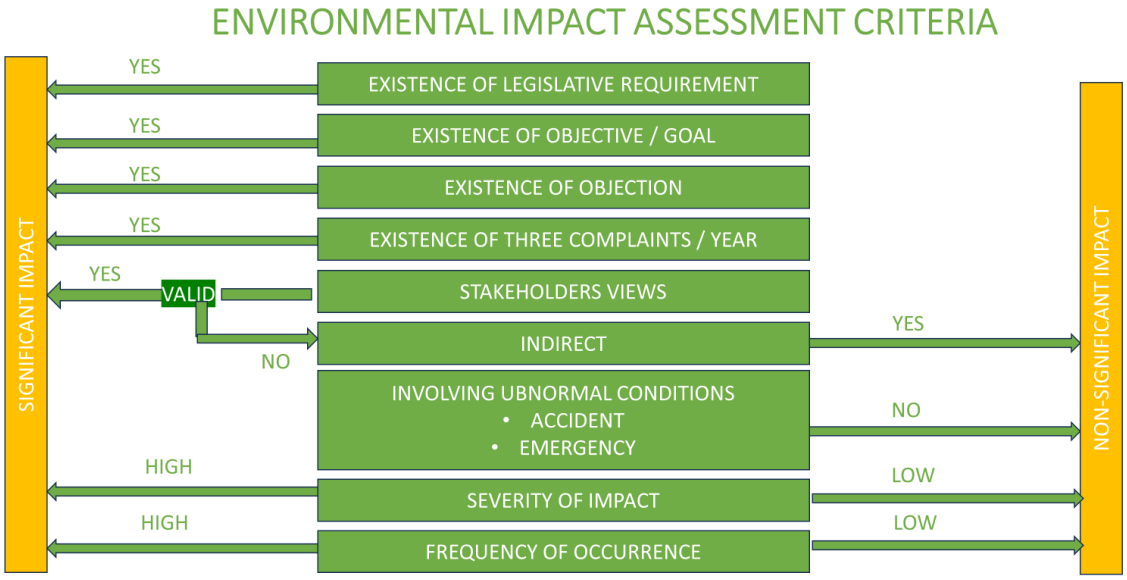
It is important to note that the team responsible for the identification of the environmental aspects, examines at regular intervals and in case of new activities or changes, the environmental records of the company in order to identify any new environmental aspects / impacts arising from:

- new activities / products / services or changes of the existing ones
- new compliance obligations due to changes in legislation
- stakeholders' views
- unusual / emergency operating conditions that had not taken into account

The environmental impacts are assessed according to a series of criteria; more specifically:

- every legislatively regulated impact is considered important
- every impact related with the environmental policy and/or an already established target / objective of the company is considered important
- every impact for which an objection or a complaint has been raised, or is viewed as significant by relevant stakeholders, is considered important

The assessment method of the environmental impacts is shown on the following diagram, from which the most important environmental impacts are extracted.



2.2 Health, Safety and Environmental Policy (HSE Policy)

Motor Oil operates with respect to Health, Safety and the Environment. To achieve that, Motor Oil is committed to:

- Upgrade continuously its process safety through the detailed consideration of its weaknesses and the implementation of whatever is needed to convert them to a permanent advantage of its future operation.
- Set objectives and realistic HSE targets, support them by reorganizing its operating procedures and accomplish a continuous improvement of its safety performance, in practice.
- Implement any initiative to remove the causes that can compromise the safety and health of employees and other people in its operational areas.
- Follow refining industry trends and adopt new technology for the optimization of its daily activities
- Meet or exceed legal and other requirements in respect to its assets and society needs.
- Manufacture quality products using raw materials, energy and technology efficiently.
- Make all efforts to minimize its environmental impact improving the quality and the treatment of waste, discharges and emissions.
- Report its performance, good or bad, as a responsible corporate citizen.
- Maintain and test emergency preparedness and response systems keeping all involved personnel completely aware and active.
- Integrate Health, Safety and Environmental considerations into all business decisions, plans and operations in the framework of the Integrated Management System.
- Provide consultation, information and training to employees, contractors and other staff working on its behalf in order to ensure their commitment to safety and awareness.
- Cooperate with all stakeholders in order to develop balanced Health, Safety and Environmental programs, that are reviewed whenever they are becoming inefficient.

At Motor Oil whatever we conceive, plan or do, we do it in safe, environmentally friendly and cost-effective manner.

“Sparing no resources we strive for excellence and HSE leadership to achieve an incident free workplace”.

2.3 Environmental Programs, Objectives and Improvements

During the years 2020 - 2023 the company has implemented numerous programs aiming at the minimization of the environmental impacts of its operations, while reducing losses, recovering raw material residues and reducing production cost. The programs implemented and their time of completion is shown in the following table:

	2020	2021	2022	2023
AIR				
- Reduction of CO_2 emissions / MT of feedings by 20% due to furnaces renovation / refurbishment of vacuum distillation unit U200.	●			
-Air pollutants emissions reduction/MT of feeding, by modernizing unit M-200		●		
SOIL				
- Soil study of the new tanks T790/T792 installation area in order to certify the soil for land use change.	●			
-Separate collection of recyclable municipal waste at the Refinery (paper, cardboard, paper packaging, metal and plastic packaging)			●	●
- Search / determination of at least one additional way to manage the sludge from the bottom of the tanks after the proper treatment in the decanter and from the wastewater treatment units.	●			
- Construction of new bed at the contaminated soil treatment plant by the method of bioremediation, aiming in increase the unit capacity by 5%	●			

	2020	2021	2022	2023
ENERGY				
- Improving of energy efficiency of the U-200 furnaces	●			
- Improving the energy efficiency of the water desalination plant	●			
-Overhaul of the Catalytic Cracking Unit, thus improving its energy efficiency	●			
-Overhauls of the Hydrogen Production Unit, thus improving its carbon footprint	●			
-Overhaul of Furnace H-351N, thus improving its efficiency	●			
-Installation of advanced process control systems (APC) with analyzers in the vacuum distillation unit (U-200) and in alkylation unit (U-3700) as well as the installation of a Diesel Optimizer for productions with minimum energy consumption configurating the individual units.	●			
-Improvement of the energy efficiency of unit U-7830 by modifying the turbine for HPS/MPS operation mode, thus saving 11 TJ	●	●		
-Installation of an Energy Consumption Optimization Operating System for the Refinery				●
-Installation of a heat exchanger to recover heat from the visbreaker residue stream				●

2.4 Environmental Aspects and Impacts

The environmental impacts are classified as follows:

- Direct or indirect: This depends on whether the company has or has not the responsibility of their direct handling, taking into account the existing legal context, contracts with clients or suppliers, as well as the feasibility for the company to control the impacts.
- Major or minor depending on whether handling these impacts is controlled by the Environmental Management System.

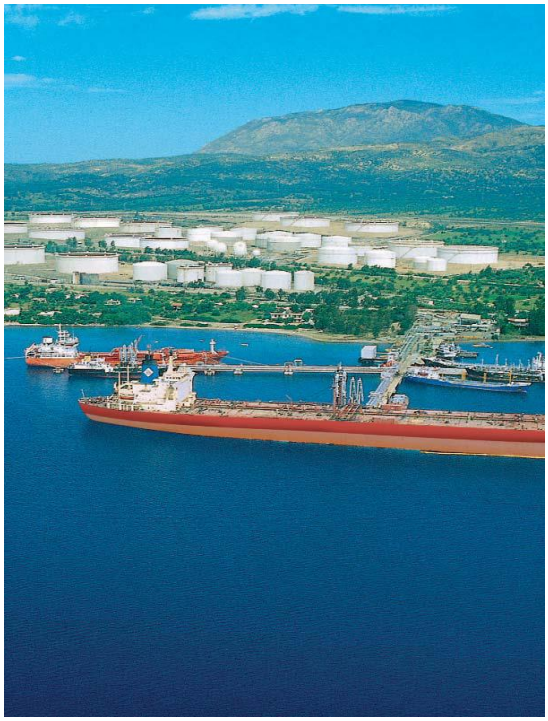
All the environmental impacts related to the operation of the Refinery have been evaluated according to their significance and among them the following are characterized as important:

- Air emissions from point and diffuse sources from refinery production processes
- Industrial and Sanitary waste water
- Solid waste, hazardous or not
- Energy and water consumption
- Noise

All the above environmental impacts are monitored and recorded on a regular basis, in order the Company to act appropriately and to optimize its environmental performance. A similar evaluation of impacts is also carried out during the construction of new projects. In addition, threats / risks connected to the environmental impacts or arising from them are identified and evaluated.

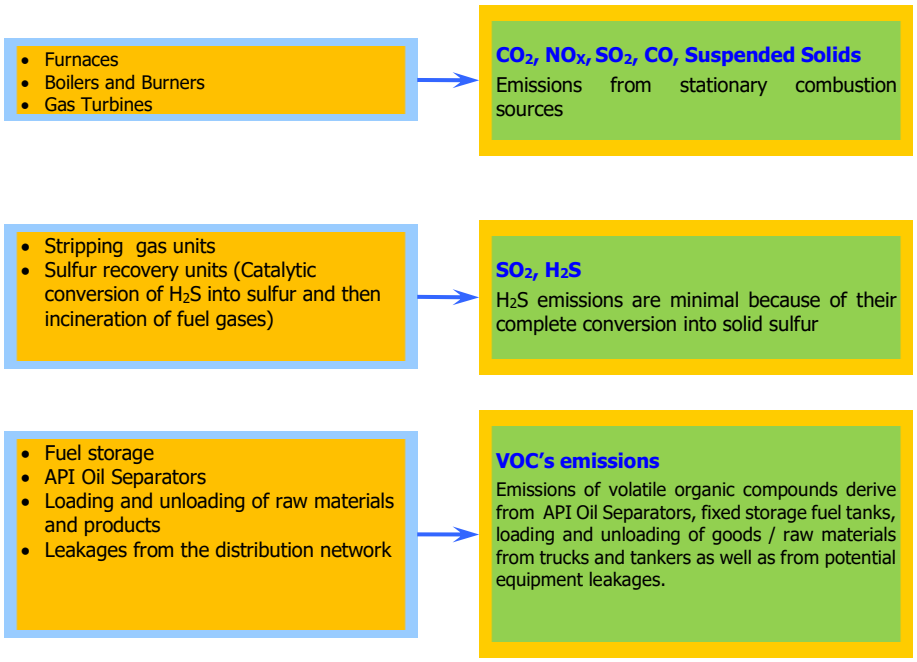
At the same time, the Company has evaluated the indirect environmental impacts resulting from the interaction with third parties, products and services over which the Company does not have any administrative control.

The main environmental aspects associated with air emissions, liquid and solid waste, and the indirect environmental impacts are described in the following sections.



2.4.1 Waste Gas

Air emissions due to the operation of the Refinery units, as well as their sources are shown at the following diagram.



In order to reduce emissions of air pollutants into the atmosphere, the following Best Available Techniques are applied in accordance with Decision 2014/738/EU, which include minimization measures either during the design of new projects or during the production process. The main Best Available Techniques for minimizing of the air pollutants applied to the refinery, are:

- Treatment of sour and liquid gases before their storage, or their use as a self-consumption fuel, aiming at removing hydrogen sulfide.
- Operation of sulfur recovery units aiming to convert the produced hydrogen sulfide into solid sulfur, which is environmentally friendly.
- Operation of electrostatic filter (ESP) at Catalytic Cracker Unit stack in order to reduce the suspended solid emissions
- Gradual replacement of burners by equivalent with low-NOx emissions.
- Maximising natural gas usage, in the refinery fuel mixture
- Reduction and control of hydrocarbon emissions by taking several measures, such as the installation of closed circuits in gas processing operations, the routing of gases from safety valves to flares, secondary seals in floating roof tanks, floating covers in oil separators and a Vapor Recovery Unit (VRU) in the Truck Loading Terminal. Additionally, the new Vapor Recovery Unit for loading and unloading of tanker ships is at the implementation phase.
- Performance control of burners and boilers.
- Monitoring of air emissions through continuous and periodic measurements.

Annex II of the present Environmental Declaration contains the lists of refinery vehicles, from which air emissions arise, and the Company takes all necessary measures to reduce them, such as regular vehicle maintenance, vehicle technical inspection, valid exhaust fumes control card.

2.4.2 Waste Water

Wastewater produced in the refinery is distinguished in two categories:

- Industrial wastewater
- Sanitary wastewater

Industrial wastewater, which includes process water, tank drainage, ballast water, rainwater coming from refinery areas potentially contaminated with oil is directed either directly, or after some pre-treatment process, to the Industrial Wastewater Treatment plant (primary and secondary treatment), where the pollutant load is reduced, and the water is discharged, according to the environmental provisions and terms.

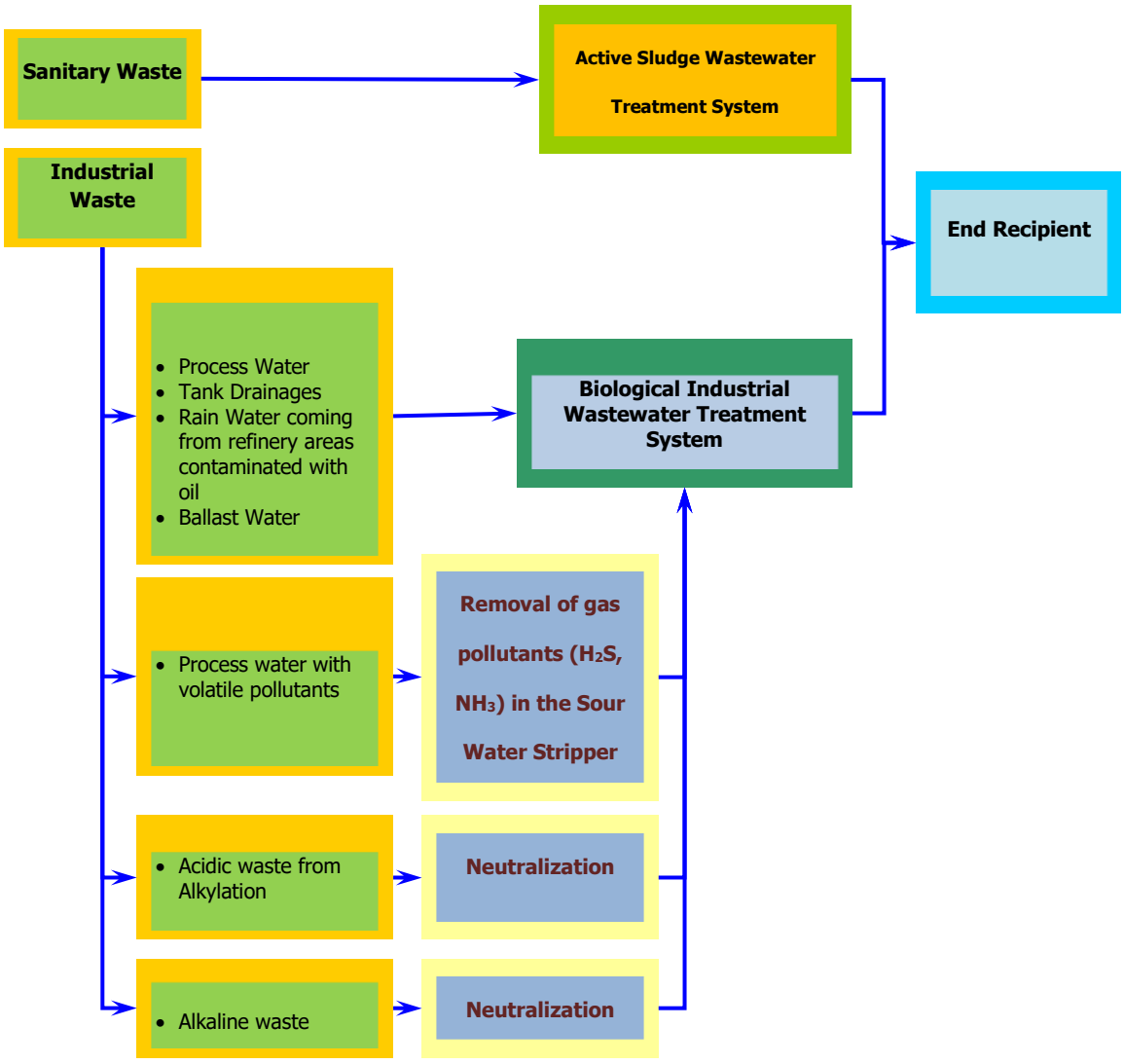
Sanitary wastewater coming from personnel catering and hygiene areas is treated in the sanitary wastewater treatment plant. The qualitative characteristics of the treated wastewater are within the defined legislative limits.

The Best Available Techniques applied to minimize liquid waste to the ecosystem in accordance with Decision 2014/738/EU, mainly concern the reduction of the volume of wastewater and its treatment before being disposed to the waste water treatment plant. Briefly presented below:

- To reduce water consumption or reduce the volume of liquid waste, the following are observed:
    - Part of the stripped acid water is taken to the desalination of the crude oil distillation plants
    - The complex of mild hydrocracking units (M-7500) operates with a closed cooling circuit (cooling tower)
- In the refinery the water management is carried out in the best possible way, where each flow is subjected to the appropriate treatment:
    - the acidic water of all production units (sour water) are stripped in sour water stripping unit and then the maximum possible amount of stripped water is led to the desalinators of crude oil.
    - The wastewater of the alkylation unit after its treatment within the refinery's unit is led to the refinery's wastewater treatment plant.
    - Alkaline solutions are neutralized at waste water neutralization unit before being driven to Refinery's Waste Water Treatment Plant.
    - Ballast water is driven through closed pipelines to a suitable tank where part of the hydrocarbons are separated by gravity. The separated liquid phase is heading to the wastewater treatment plant, while the separated oil phase is driven to the crude oil tanks for re-refining
- In case the wastewater to be treated exceeds the capacity of the plant, the excess volume is led to containment basins, so that the exceeded wastewater can be treated in a control manner.

- The facility operates two independent collection networks for different quality of liquid wastes (oily aqueous waste, non-oily aqueous waste). The separation of non-polluted water flows is achieved as follows:
    - Urban wastewater is treated in an independent plant with a total capacity of 60 m^3/h
    - the remaining wastewater of the seawater desalination plants are, together with the return of the cooling water led to a common pipeline and then through the main pipeline to the end recipient.

The diagram of the total wastewater treatment at the refinery, is given below:



WASTEWATER TREATMENT

The whole/sum of the Refinery's oily water waster is processed in the Industrial Wastewater Treatment Plant, which includes primary and secondary treatment stages.
In this facility result the:

- Acidic wastewater from all production units that has been stripped in the steam stripping unit. The maximum feasible quantity of stripped water is guided to the crude oil desalination facility, whereas the remaining quantity results in the Industrial Wastewater Treatment Plant.
- Acidic wastewater produced by the alkylation unit after its neutralization in dedicated tanks within the facility.
- Alkaline solutions from production units following oxidization / neutralization in the neutralization unit. In case of malfunction in the neutralization unit, the alkaline wastewater is temporarily stored into a tank, until the malfunction is restored. Consequently, the alkaline solutions are either led for treatment in the above-mentioned neutralization unit, or, if the latter is not feasible (e.g., accumulation and storage of great volumes) the alkaline solutions are at the disposal of licensed waste management companies
- The remaining wastewater of the production units that are not included in the above-mentioned categories
- Tank drainage
- The polluted rainwater, rinsing water, occasional leakages, and the water from the safety basins of the firefighting tanks
- The oil products and the ballast water of the serviced tanker ships are guided through closed pipelines to a tank, where a part of the hydrocarbons is separated by gravity. The separated liquid phase results in the Industrial Wastewater Treatment Plant, while the separated oil phase results in the crude oil tanks for re-refining.
- The rainwater from the Refinery's oil contaminated areas. In case the rainwater for treatment exceeds the capacity of the plant, the redundant volume deviates into containment tanks, so that the capability of controlled treatment is given.
- The leachates and any weighted rainwater that are not re-used by the treatment / polluted soil and sludge biodegradation facilities and by the sludge stabilization unit.
- The rainwater of the port facility, following their collection into a local, complete and independent collection system.

The recovered hydrocarbons from the Industrial Wastewater Treatment Plant are led for re-refining.

The urban wastewater (sewage) undergoes a multistage processing in an independent Urban Wastewater Treatment Unit.

The oil and urban wastewater after their treatment, the effluent cooling water (saltwater) and the remaining wastewater from seawater desalination facilities by reverse osmosis are led into a central shared undersea pipeline towards the end recipient (Saronic Gulf)

The aforementioned wastewater currents undergo, contextually, monitoring and testing according to the environmental terms of the Refinery.

The non-polluted rainwater that comes from areas apart the production and from areas without industrial activity result with free stream outside the facilities

The aforementioned, regarding wastewater treatment, are mentioned analytically in the following procedures of the Environmental Management System:

- COP (Communication Procedure) ENM-02 Wastewater – Wastewater Treatment
- COP (Communication Procedure) ROS-30 Acidic Water Draw-off Treatment towards U-4950
- OPP (Operations Procedure) 80009651- Biological Wastewater Treatment Operation (M-4000)
- OPP (Operations Procedure) 80009652- Biological Sanitary Wastewater Treatment Operation
- OPP (Operations Procedure) 80009653- Oil Separators Operation (API Separators)
- OPP (Operations Procedure) 94006301- Caustic Neutralization Unit (M-6300)
- OPP (Operations Procedure) 96004902- Water Purification Unit Operation U-4950 (Sour_Water_Stripper)

2.4.3 Solid Waste

Solid waste generated in the Refinery consists of domestic waste resulting from human activities (consisting of household solid waste) and of industrial solid waste (such as scrap materials, spent catalysts, etc.) which is produced during the different stages of the production process.

In order to ensure safe environmental management of solid waste and to prevent or reduce the negative consequences on the environment and the human health and safety risk, the Company implements an environmental integrated plan including the waste collection, transportation and temporary storage or treatment, until the final management. The final management is performed by licensed companies, depending on the nature of the materials, while the ultimate goal is waste recovery.

The company annually submits the type and quantity of solid waste resulting from the activities of the facilities as well as the way of their management (disposal or recovery) to the Electronic Waste Register (EWR) of the Ministry of Environment and Energy.
In the table below, the main types of solid waste produced by the company facilities are presented.

SOLID WASTE MANAGEMENT

At the table below, there is a description of the solid waste / recyclable materials as well as the corresponding EWC Code and the management method. The table includes all solid wastes / recyclable materials that have been produced, delivered and managed by the refinery the last 10 years.

Type of Waste	EWC Code	Management Method
Bitumen	05 01 17	Disposal / Recovery
Wastes not otherwise specified	05 01 99	Recovery
Waste printing toner containing hazardous substances	08 03 17*	Recovery (Recycling)
Welding wastes	12 01 13	Recovery (Recycling)
Waste blasting material, other than those mentioned in 120116	12 01 17	Recovery (Recycling)
Other hydraulic oils	13 01 13*	Recovery (Reprocessing)
Other engine, gear and lubricating oils	13 02 08*	Recovery (Reprocessing)
Paper and cardboard packaging	15 01 01	Recovery (Recycling)
Plastic packaging	15 01 02	Recovery (Recycling)
Wooden packaging	15 01 03	Recovery (Recycling)
Metallic packaging	15 01 04	Recovery (Recycling)
Composite packaging	15 01 05	Recovery
Mixed Packaging	15 01 06	Recovery (Recycling)
Glass packaging	15 01 07	Recovery (Recycling)
Packaging containing residues of or contaminated by dangerous substances	15 01 10*	Recovery
Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances	15 02 02*	Disposal / Recovery
End-of-life tyres	16 01 03	Recovery
End-of-life vehicles	16 01 04* / 16 01 06	Recovery
Transformers and capacitors containing PCBs	16 02 09*	Disposal
Discarded equipment containing hazardous components	16 02 13*	Recovery
Organic wastes containing hazardous substances	16 03 05*	Recovery

Type of Waste	EWC Code	Management Method
Gases in pressure containers (including halons) containing hazardous substances	16 05 04*	Disposal / Recovery
Laboratory chemicals, consisting of or containing hazardous substances, including mixtures of laboratory chemicals	16 05 06*	Disposal
Lead batteries	16 06 01*	Recovery (Recycling)
Ni-Cd batteries	16 06 02*	Recovery (Recycling)
Wastes containing oil	16 07 08*	Recovery
Spent catalysts	16 08 02*	Recovery
Spent fluid catalytic cracking catalysts	16 08 04	Recovery (Recycling)
Spent catalysts contaminated with hazardous substances	16 08 07*	Disposal / Recovery
Linings and refractories from non-metallurgical processes containing hazardous substances	16 11 05*	Recovery (Recycling)
Glass, plastic and wood containing or contaminated with dangerous substances	17 02 04*	Recovery
Copper, bronze, brass	17 04 01	Recovery
Aluminium	17 04 02	Recovery (Recycling)
Iron and Steel	17 04 05	Recovery (Recycling)
Mixed Metals	17 04 07	Recovery (Recycling)
Cables other than those mentioned in 17 04 10	17 04 11	Recovery (Recycling)
Soil and stones containing dangerous substances	17 05 03*	Bioremediation and disposal / Recovery
Soil and stones other than those mentioned in 17 05 03	17 05 04	Recovery / Disposal
Insulation materials other than those mentioned in 17 06 01 and 17 06 03	17 06 04	Recovery
Construction materials containing asbestos	17 06 05*	Disposal
Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	17 09 04	Recovery

Type of Waste	EWC Code	Management Method
Wastes whose collection and disposal is subject to special requirements in order to prevent infection	18 01 03*	Disposal
Sludges from physico/chemical treatment containing dangerous substances	19 02 05*	Recovery / Disposal
Stabilised wastes other than those mentioned in 190304	19 03 05	Recovery / Disposal
Solid wastes from soil remediation other than those mentioned in 19 13 01	19 13 02	Recovery / Disposal
Paper and Cardboard	20 01 01	Recovery (Recycling)
Fluorescent tubes and other mercury-containing waste	20 01 21*	Recovery (Recycling)
Edible oil and fat	20 01 25	Recovery / Disposal
medicines other than those mentioned in 20 01 31	20 01 32	Recovery / Disposal
Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries	20 01 33*	Recovery / Disposal
Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components	20 01 35*	Recovery (Recycling)
Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	20 01 36	Recovery (Recycling)
Plastics	20 01 39	Recovery (Recycling)
Metals	20 01 40	Recovery (Recycling)
Bulky waste	20 03 07	Recovery (Recycling)

SOLID WASTE MANAGEMENT

Solid waste management in the Refinery is conducted according to the current legislation requirements. All waste is delivered, with respective contract agreements, to appropriate collectors / carriers responsible for the transfer to licensed end recipient prioritizing material retrieval.

It should be noted that the Refinery continuously evaluates improvement opportunities regarding waste management, with the aim of implementing the most environmentally friendly practices. Specifically, waste prevention is the most preferred option, followed by reuse, recycling, recovery including energy recovery, and as a last option, safe disposal of waste.

It undergoes a synergy with the cement industry, so that a significant quantity of the Refinery's nonhazardous waste is channeled to this specific industrial sector for utilization / retrieval (industrial symbiosis):

- Used sandblast and specific type exhausted catalysts are absorbed as alternative raw material
- Used activated carbon utilized as alternative fuel

Packaging waste, mixed packaging, and wood are guided for recycling. Following the same approach, produced scrap, paper / carton, and specific quantities of bitumen are processed likewise.

All hazardous waste is promptly delivered by licensed collection - transfer handlers towards the licensed end recipients, by completing in parallel the Electronic Waste Registry (EWR), according to procedure ENM-04 Solid Waste – Solid Waste Treatment. When storing is required, pending collection / transfer, then this takes place in appropriate areas for hazardous waste storage.

Waste treatment that is subject to specific treatment protocols is implemented by approved alternative management systems (AMS) or appropriate licensed carriers that collaborate with AMS:

- Oil waste results in a collection center for regeneration by a licensed collector that collaborates with the relevant AMS and through usage of appropriate transfer vehicles
- Waste batteries are recycled by a local facility through the collective system COMBATT S.A.
- Waste of electrical and electronic equipment (WEE) is transferred to certified collection centers by the approved Collective System for the alternative management of WEE APPLIANCES RECYCLING S.A.

Polluted soils could undergo biodegradation in the Refinery's treatment / bioremediation facility using the biopiling method or be directed directly to appropriate recipients. Furthermore, clothing and textiles that have been contaminated with hazardous substances are collected into special big bags inside specific metal bins located in specified points

throughout the Refinery, and then they are removed by a licensed hazardous solid waste treatment handler.

Hazardous contaminating waste from the Refinery's medical treatment services is led for sterilization.

Various hazardous waste (packaging with hazardous substances, sludge, organic waste, oil-containing waste, absorbing materials) is processed according to specific contract agreements.

Transborder transportations are accomplished according to the current national and communal legislation, taking into consideration the Basel Convention:

The exhausted catalysts are directly led to processing facilities abroad for usable metals retrieval or are led to appropriate recipients in Greece.

The execution of works for removing asbestos traces is implemented by companies that comply with specific requirements against the legislation and by ensuring all the necessary measures are taken. Asbestos waste is placed in appropriate packaging and then transferred for disposal abroad.

The aforementioned, regarding solid waste treatment, are mentioned analytically in the following procedures of the Environmental Management System:

- COP (Communication Procedure) ENM-04 Solid Waste – Solid Waste Treatment
- COP (Communication Procedure) ENM-04 SYN. 1 Solid Waste HWC Codes & Management Works
- COP (Communication Procedure) ENM-11 Catalysts – Inactive Solid Waste Management
- OPP (Operations Procedure) 8000009- Polluted Soils Bioremediation Unit Operation
- OPP (Operations Procedure) 8000009 SYN.1 Rule of Operations for the Polluted Soils Bioremediation Unit
- OPP (Operations Procedure) 8000011 Sludge Biodegradation Unit Operation
- OPP (Operations Procedure) 8000011 SYN. 1 Rule of Operations for the Sludge Biodegradation Unit
- OPP (Operations Procedure) 80009501- Sludge Treatment Unit Operation (LIFE-SORU)

2.4.4 Indirect Environmental Aspects

The indirect environmental impacts are mainly related to the air pollution caused by vehicles (a list of vehicles is provided in Appendix II of this Environmental Declaration), the nuisance coming from tank truck traffic and vessel stopover in anchorages, as well as the side impacts in case of an accident during the transport of products to and from the refinery either from suppliers or to customers.

Within the framework of the Integrated Management System, the Company evaluates its environmental performance and trains its suppliers, contractors and subcontractors, on several environmental issues and continuously gives information to its customers regarding the usage and distribution of the products. At the same time, it investigates new, environmentally mild solutions to its transportation needs and attends to the effective organization of its raw material and product transport.

2.4.5 Environmental Incidents

Having set as main priorities the prevention of the undesirable effects of the operation of the units and the minimization of hazards during operations, the Company aims at the elimination of environmental incidents / accidents.

For that purpose:

- Emergency response plans, fully compliant to local and national plans are compiled in order to provide the necessary directions for the appropriate decisions and actions taken.
- Has submitted to the competent authorities an Environmental Risk Assessment (nr Ministry of Environment and Energy/DIPA/99511/6234/31-10-2019) in cases of major accident and natural disasters according to JMD 1915/2018. The study has identified and evaluated the environmental impacts in case of major accidents and natural disasters, while the measures to avoid and mitigate them are analyzed.
- Systematically conducts preparedness drills and organizes employee trainings to ensure the correct response in case of emergency

The effectiveness of the above activities is attested by a record of no environmental incidents / accidents during 2023, as well as in previous years.

2.5 Understanding the context, the stakeholders' expectations and the identification of threats and opportunities for improvement

During the phase of understanding of refinery's operating context and the stakeholders' expectations, the team responsible for the identification of risks and opportunities defines the external and internal issues related to the purpose of the company, which can affect company's ability to achieve the desired results of the Environmental Management System.

The team responsible takes into account company's strategic priorities and identify:

- The interested parties, which are related to the Environmental Management System and their relative needs and expectations and which of these needs and expectations are becoming compliance obligations. In order to address these issues a mechanism has been created so as to handle complaints and grievance of interested parties / neighborhoods, in order to ensure that the grievances / complaints has been identified and resolved in time. During the year 2023, 22 complaints from residents / local community have been issued and resolved timely and successfully. It shall be noted that most of the complaints from residents were made during the period when the refinery maintenance work was carried out (11 out of 22 during the period from May to July).
- the external business environment (e.g. availability of resources, land use, technological environment, competition, market, economic environment, social and political environment, existing environmental status, air quality in the region of operation) and internal issues (e.g. culture, know-how, resources).

Based on the above, threats and opportunities are identified, related to:

- the expectations of interested parties
- the internal and external operating environment of the Company
- the environmental aspects and
- the compliance obligations.

After identifying the threat and opportunities, according to the above phases, improvement actions are identified.

In any case, the Refinery plans:

- to take actions on issues related to:
    - significant environmental issues
    - Compliance obligations

- risks and opportunities
- how to integrate and implement these actions in the Environmental and Energy Management System or in other business processes.

3. RESULTS of YEAR 2023

3.1 Environmental Performance of 2023

3.1.1 Waste Gas Management

Aiming at the minimizing of air emissions (point and diffuse) and within the frame of the in force Environmental Terms (YPEN/DIPA/63069/3774/01-07-2020, ΑΔΑ: 9Ω6Π4653Π8 and its amendments) and Decision 2014/738/EU, there is fully and constantly monitoring of the air emissions through continuous and periodic measurements within the Refinery and also the air quality in the wider area.

The industrial premises of MOTOR OIL utilize modern equipment for monitoring air quality at the wider area and point emissions coming from the production process.

The Monitoring network of Air Quality consists of a mobile station (A), which is near to the port facilities, and has the capability to measure and record continuously pollutants such as hydrogen sulfide (H_2S), sulfur dioxide (SO_2), suspended solids (PM_{10} and $PM_{2.5}$) nitrogen oxides (NO, NO_2, NO_x), hydrocarbons (methane, non-methane, and total hydrocarbons), benzene (C_6H_6), carbon monoxide (CO), as well as, meteorological parameters (wind speed and direction, temperature and relative humidity of air). In addition there are three permanent stations for measuring hydrogen sulfide (H_2S) and sulfur dioxide (SO_2). Two out of three permanent stations are located within the refinery premises (B, C), and the third one at the area of Agioi Theodoroi (see map).

Air emissions are controlled by a network of Continuous measuring devices, which are connected to the Refinery Control System (DCS) as well as periodic measurements by an Independent accredited third party.

Continuous measurements are performed to:

- Oxygen in all combustion plants in order to control combustion,
- Sulfur dioxide (SO_2), suspended solids, nitrogen oxides (NOx), carbon monoxide (CO) and operational parameters (flow, oxygen, pressure, humidity and temperature of flue gases) at the Large Combustion Plants of fuels, lubricants and MHC units and the power generation plants S7001/2, S7003/4 and S7005 (stacks with rated thermal input >50MW).

Noteworthy that the installation phase of the measuring devices of CO/H_2O in LCP of Fuel, Lubricants and MHC stacks has been completed.

Within the control and the measurements quality assurance program, the emission measuring devices (SO_2, NOx, suspended solids) of the Large Combustion plants are calibrated using parallel measurements in accordance with the EN 14181 Standard.

- Sulfur dioxide (SO_2), suspended solids, nitrogen oxides (NOx), carbon monoxide (CO) and operating parameters (flow, oxygen, pressure, humidity and temperature of flue gases) at the Catalytic Cracker Unit (FCC).
- Sulfur dioxide (SO_2), oxygen and temperature at Sulfur production Claus Units outlet.

The emissions monitoring of the remaining stacks is carried out every six months.

The results of the above measurements are compared with the pollutants' limit values, as set in the Approval of the Environmental Terms and in the following laws:

JMD 14122/549/E103/11 (Government Gazette 488B)

JMD 22306/1075/E103/07 (Government Gazette 920/08.06.07)

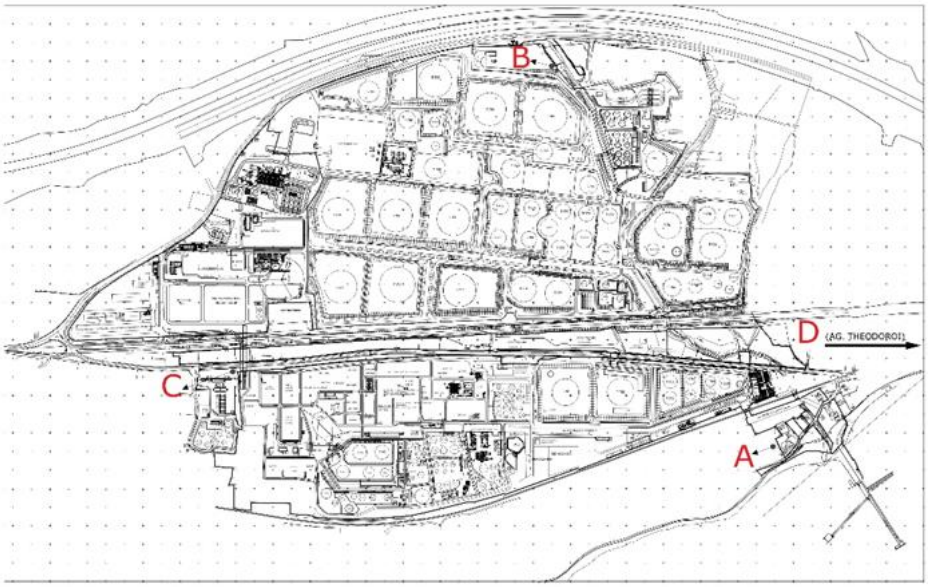
JMD 36060/1155/E103/2013 (Government Gazette 1450/B/14.06.2013)

A list of Environmental Legislation items that concern the company is offered in Annex I of this Environmental Statement.

Company compliance with the requirements of the Legislation is audited on both a regular and an ad hoc basis. The regular audits are made via the Internal Audits of the Environmental Management System (relevant procedure QSM-02 «Management Evaluations») at least once a year.

The ad hoc audits are made after a decision of the Refinery General Manager, or the Reliability and Safety Manager, or the Integrated Management System Section Head, depending on the factual elements contained in the information that is continuously provided to them.

Map depicting the locations of air quality monitoring stations



Air Quality:

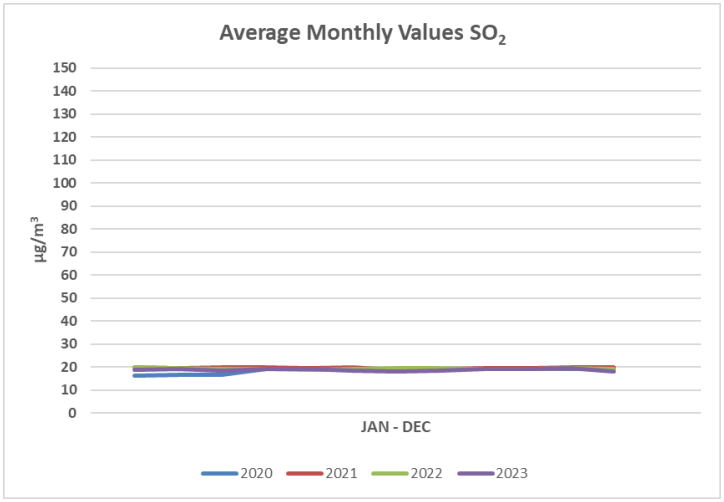
In 2023 there were no exceedances in the statutory limit values due to the operation of the refinery.

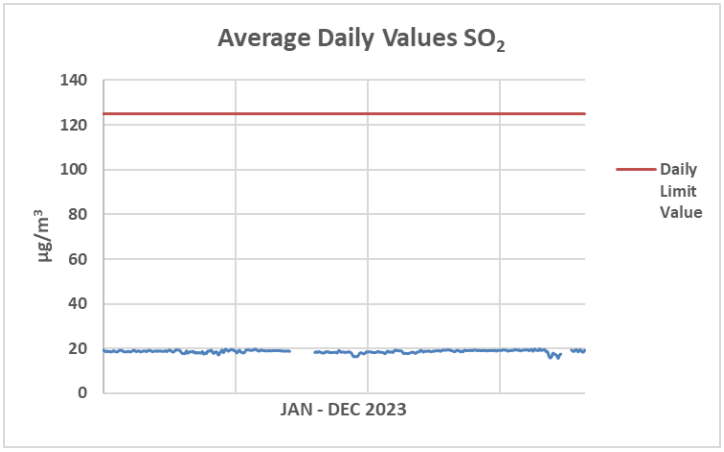
Port mobile air quality metering station:

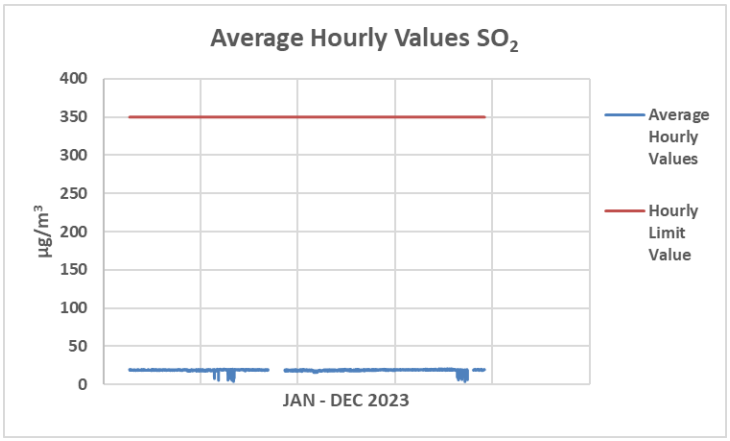
At the following table the average monthly values are presented and at the corresponding diagrams, the average hourly, daily and monthly values of pollutants, measured by the mobile station, which is located near the port facilities, for the year 2023, are presented.

2023	H_2S	SO_2	NO_2	NO_x	CH_4	NMHC	THC	CO	PM_{10}	$PM_{2,5}$	Benzene
	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	ppm	ppm	ppm	mg/m^3	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$
JANUARY	9.1	18.8	19.9	21.4	2.1	1.1	3.3	0.3	20.4	10.5	1.5
FEBRUARY	8.9	19.0	20.2	21.4	2.0	1.0	3.0	0.3	20.8	10.1	1.7
MARCH	8.4	18.3	19.9	21.2	2.0	1.1	3.1	0.3	21.1	9.6	1.8
APRIL	9.0	19.1	20.0	21.8	2.1	1.2	3.3	0.3	20.1	10.3	1.7
MAY	9.0	19.0	19.8	21.1	2.1	1.1	3.2	0.4	20.6	9.6	1.6
JUNE	8.7	18.4	19.4	20.6	2.1	1.2	3.3	0.4	20.8	10.5	1.8
JULY	8.7	18.1	19.6	20.9	2.4	1.3	3.7	0.5	20.6	9.4	1.7
AUGUST	9.4	18.5	19.4	20.8	2.0	1.1	3.1	0.4	20.2	10.0	1.9
SEPTEMBER	9.3	19.0	19.3	20.6	2.2	1.0	3.2	0.3	21.6	9.5	2.3
OCTOBER	9.2	19.2	19.3	20.9	2.2	1.1	3.2	0.3	20.8	9.3	2.1
NOVEMBER	8.8	19.3	19.4	21.1	2.1	1.5	3.6	0.4	21.7	8.3	2.0
DECEMBER	8.4	18.1	19.8	21.3	2.1	1.3	3.4	0.3	19.8	9.2	1.3
YEAR AVERAGE	**8.9**	**18.8**	**19.7**	**21.1**	**2.1**	**1.2**	**3.3**	**0.4**	**20.8**	**9.7**	**1.8**
Limit Values											
Period of Average											
1 hour		350	200								
8 hours								10			
1 day		125							50		
YEAR			40						40	20	5

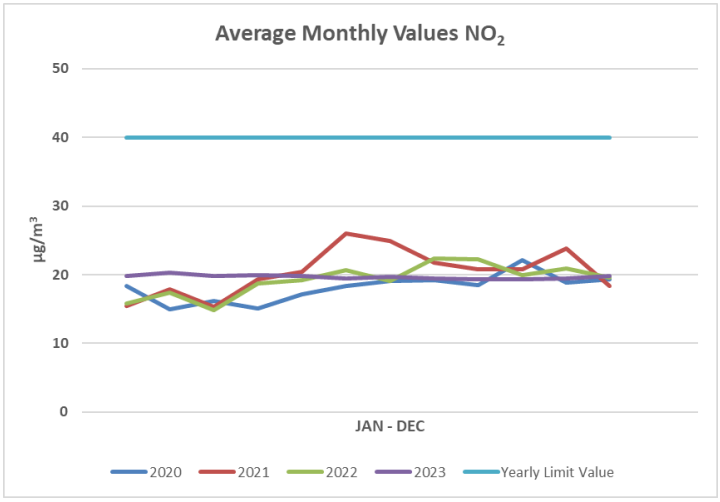
Sulfur Dioxide

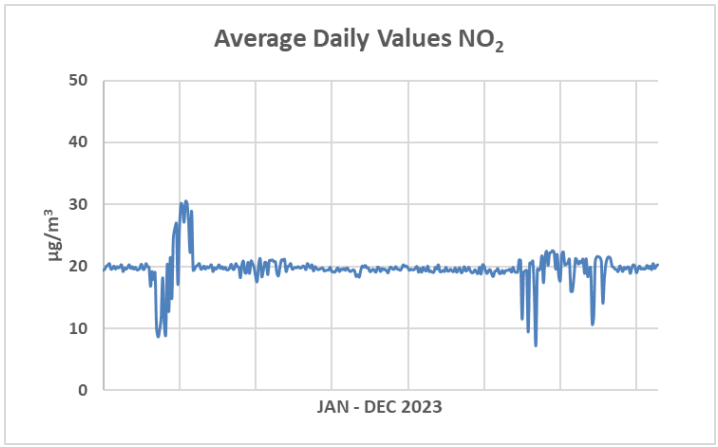


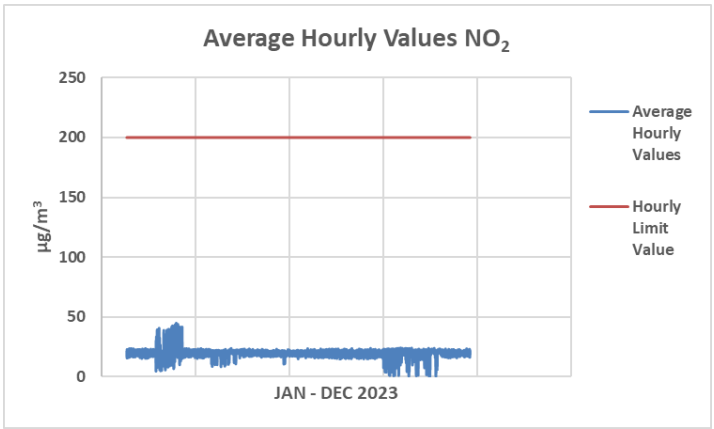




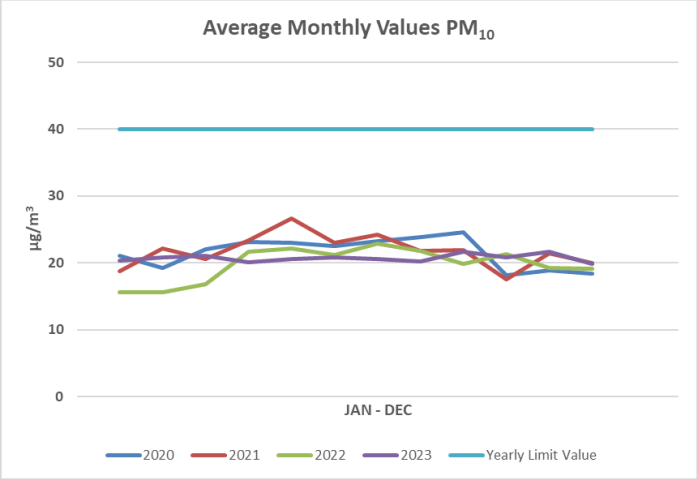
Nitrogen Oxides

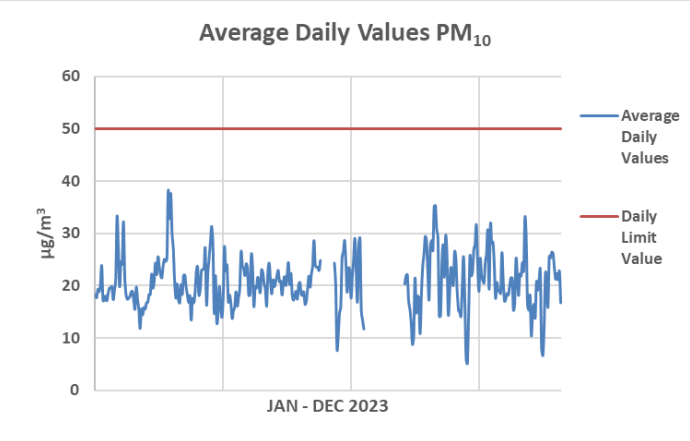




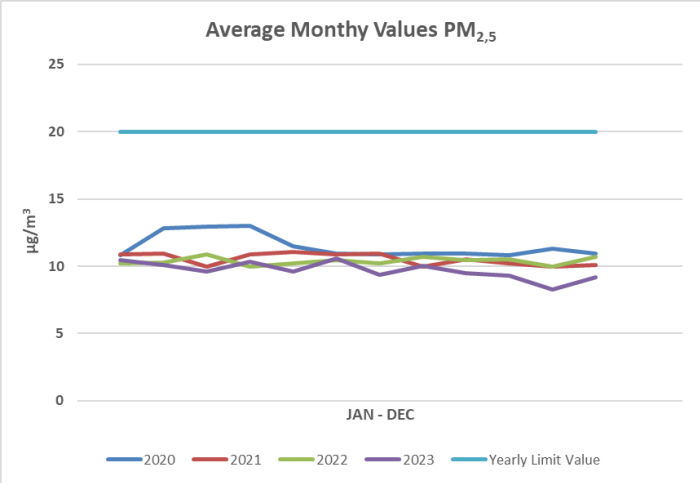


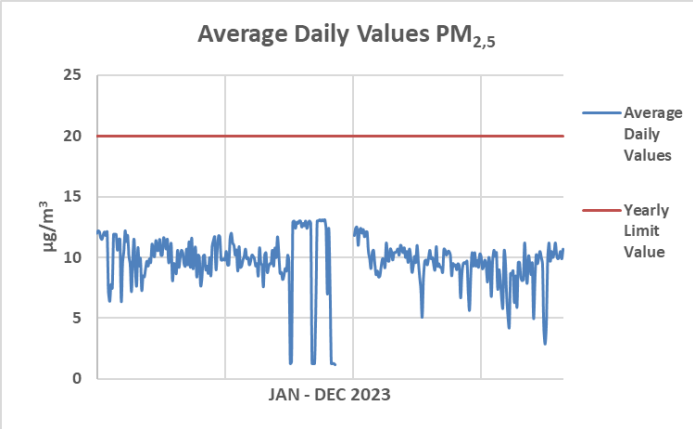
PM_{10} Suspended Solids



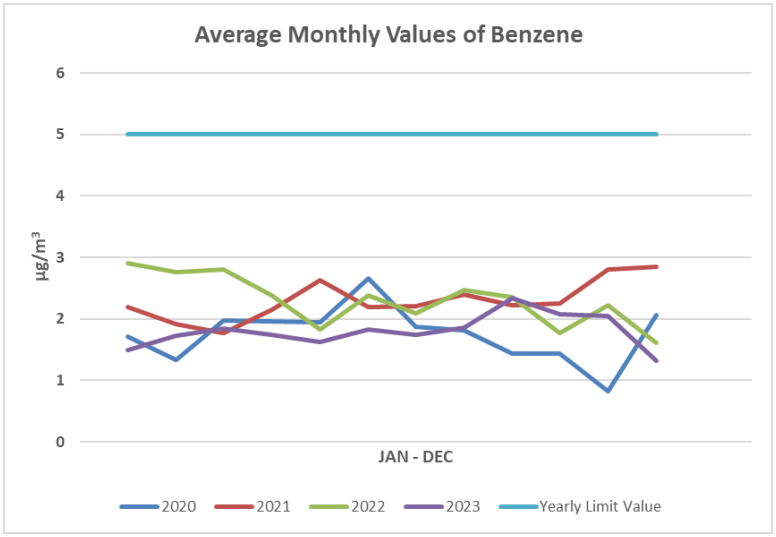


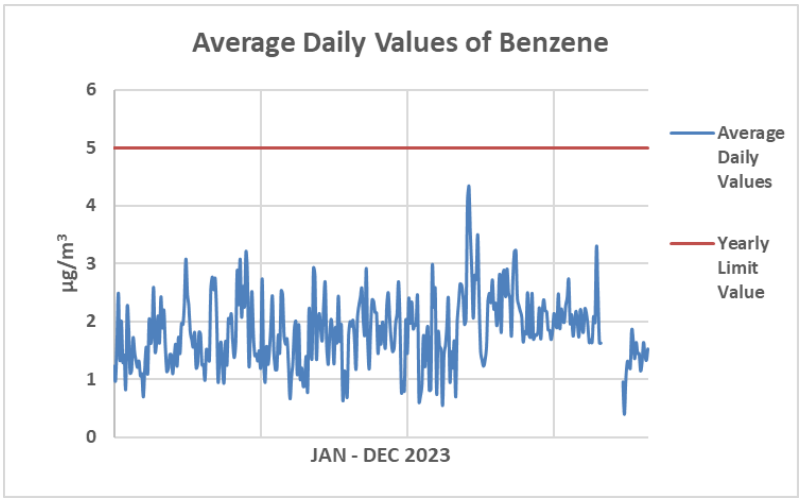
$PM_{2.5}$ Suspended Solids





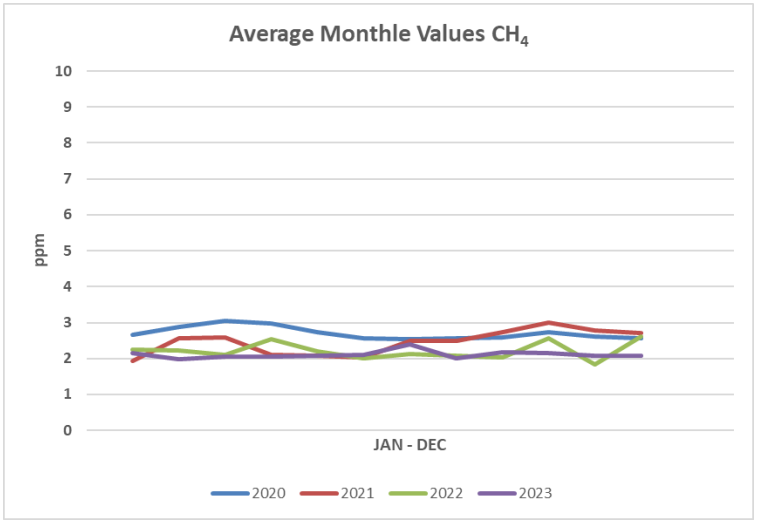
Benzene

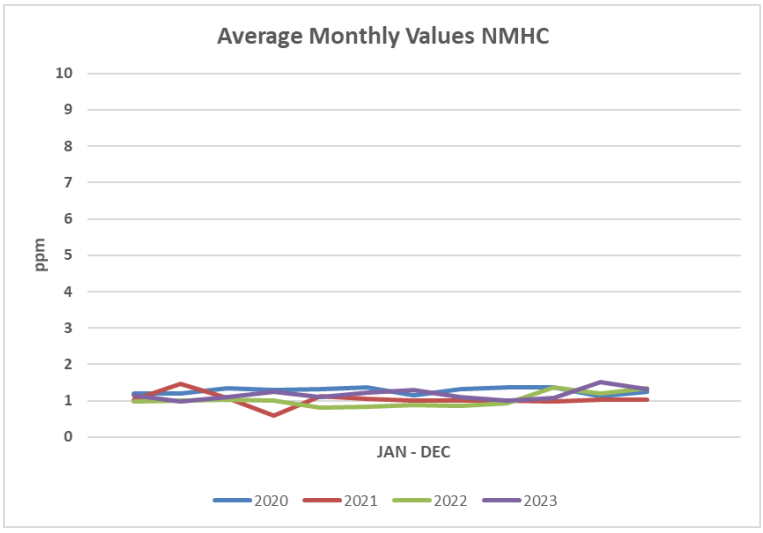


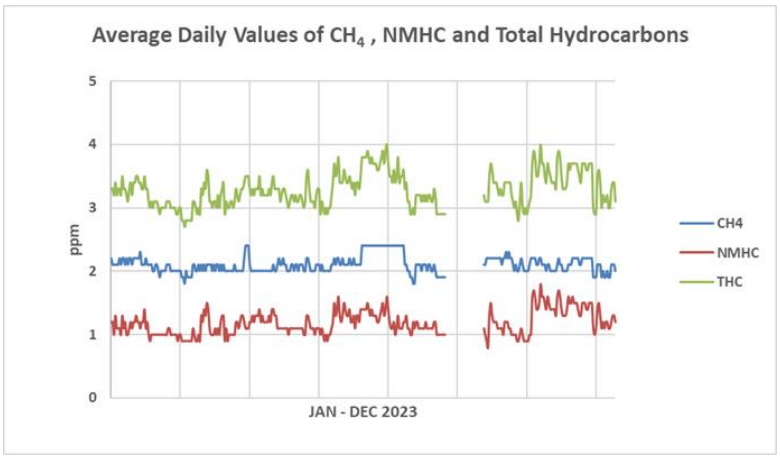


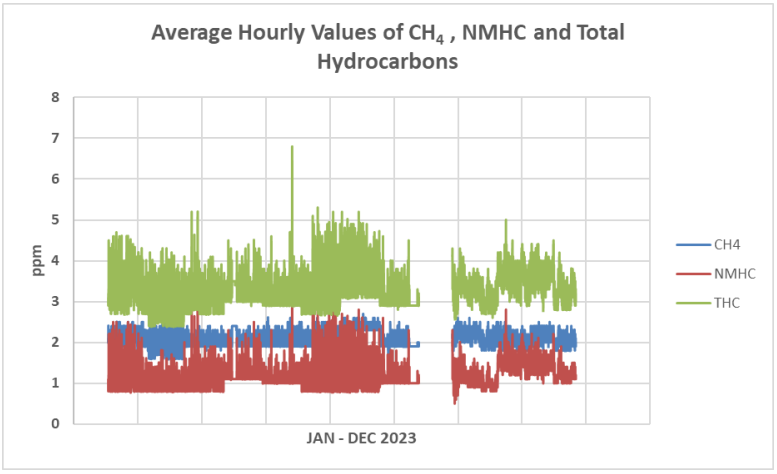
It must be noted that the Refinery is not the only source of air pollutants in the wider area of the installations. Other sources of air pollutants are the road traffic (National road Athens – Corinth), the presence of various Industrial Plants and the railway network.

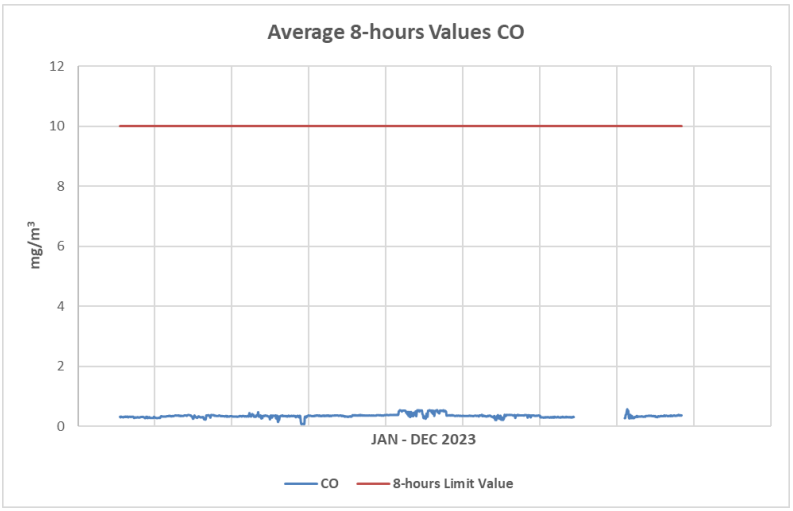
In the diagrams below the concentrations of methane (CH_4), non-methane hydrocarbons (NMHC), total hydrocarbons and carbon monoxide are shown.


Average Monthle Values CH_4
10
9
8
7
6
5
4
3
2
1
0
ppm
JAN - DEC
2020
2021
2022
2023


Average Monthly Values NMHC
10
9
8
7
6
5
4
3
2
1
0
ppm
JAN - DEC
2020
2021
2022
2023


Average Daily Values of CH_4 , NMHC and Total Hydrocarbons
5
4
3
2
1
0
ppm
JAN - DEC 2023
CH4
NMHC
THC





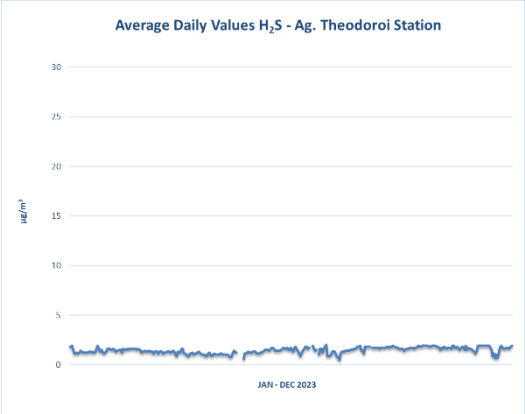
Air Quality : H_2S

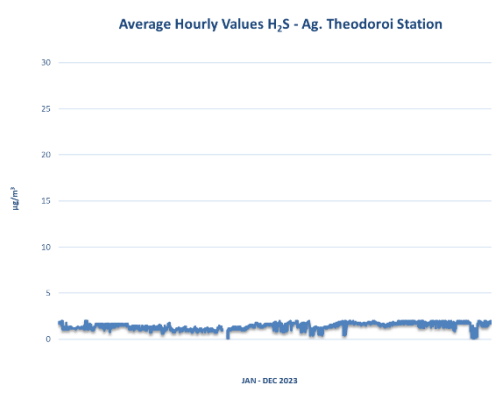
The refinery has achieved minimization of hydrogen sulfide emissions by upgrading the sour gas processing units as well as the sulfur recovery units.

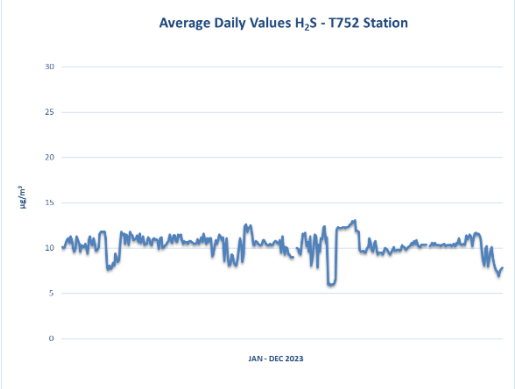
H_2S concentration is monitored continuously in all of the four stations of the Air Quality Monitoring Network.

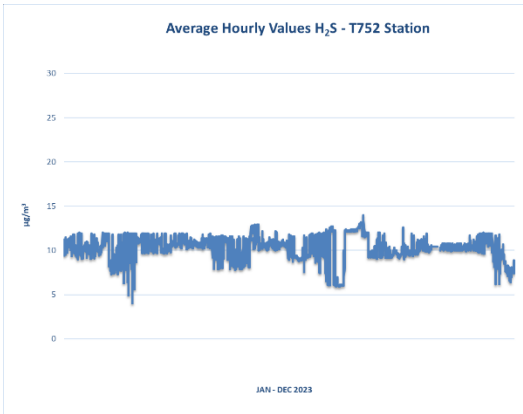
Based on the results of the measurement of air quality station in the nearest residential area (Ag. Theodoroi) and the regional stations around the area of the refinery is concluded that H_2S concentration in the wider refinery area is remarkably low.

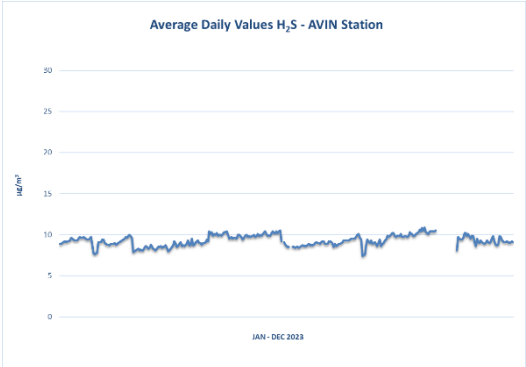
The following diagrams reflect the average daily and average hourly concentration H_2S for the stations located around the perimeter of the Refinery.

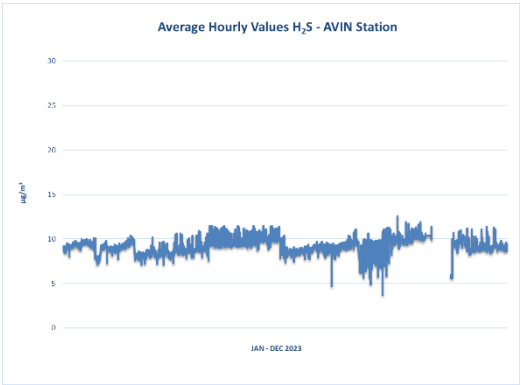






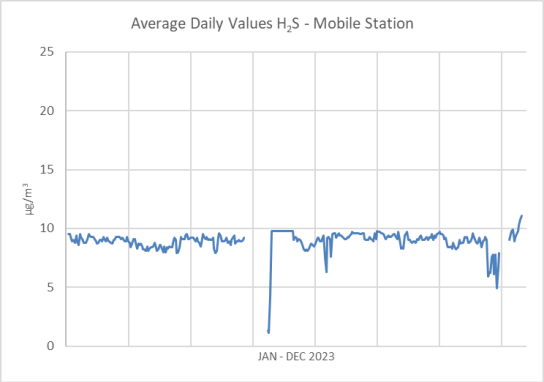


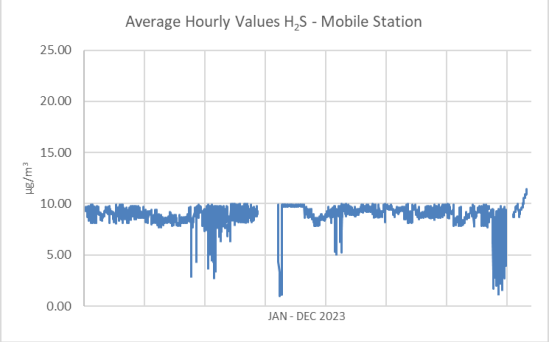




The values were not recorded due to malfunctions or maintenance of the measurement devices. It is noted that the competent authorities are informed in any case of malfunction or equipment maintenance, as well as for restoring its operation, within the timeframe of 60 days, as required by the Approved Environmental Terms.

The following diagrams illustrate the average daily and average hourly concentration of H_2S, from the Mobile Station of the Refinery.



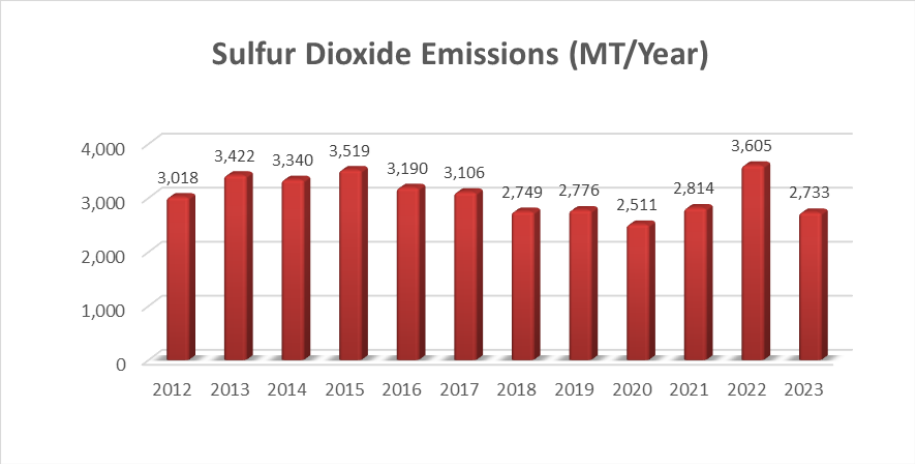


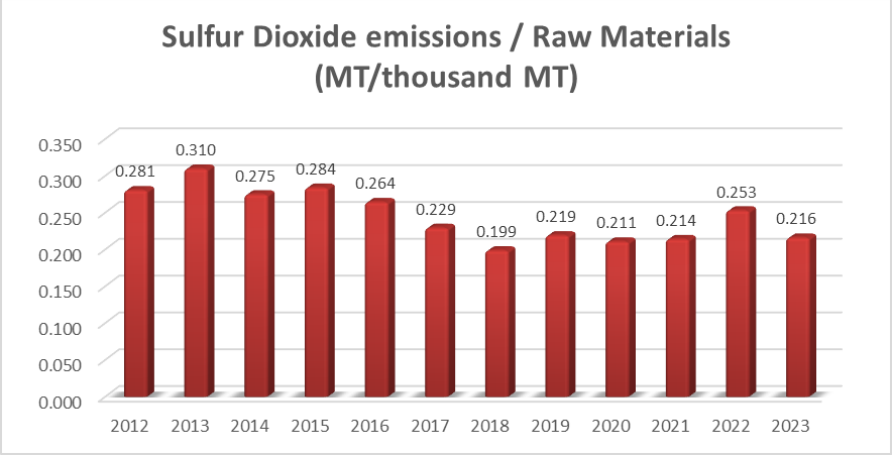
Sulfur dioxide and Nitrogen oxides emissions

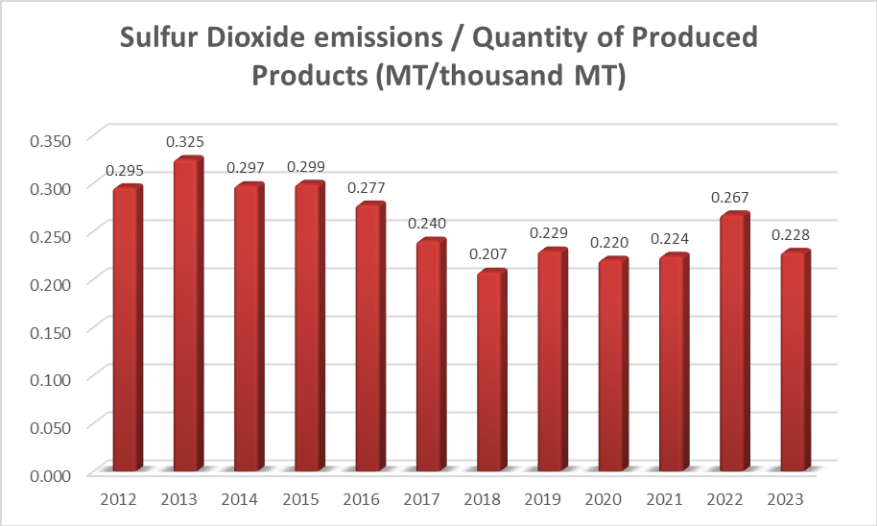
As depicted in the following diagrams, the sulfur dioxide emissions are fluctuating within the same magnitude during the last few years, despite the expansion of the production facilities and the production increase.

As presented in the diagrams below, sulfur dioxide and nitrogen oxides emissions show a downward trend either in absolute value or in normalized value per raw material and product produced, despite the expansion of industrial facilities and the increase in production (apart from the year 2022 due to reduced use of natural gas caused by geopolitical conditions prevailing in Europe). This is caused mainly from the reduced amount of sulfur in the self-consumed fuels and the increased amount of gas fuel in the blend of burnt fuels, as well as the continuously improved emission control technology used by the refinery (sour gas treatment units and sulfur recovery units). The below diagrams present the Sulfur dioxide

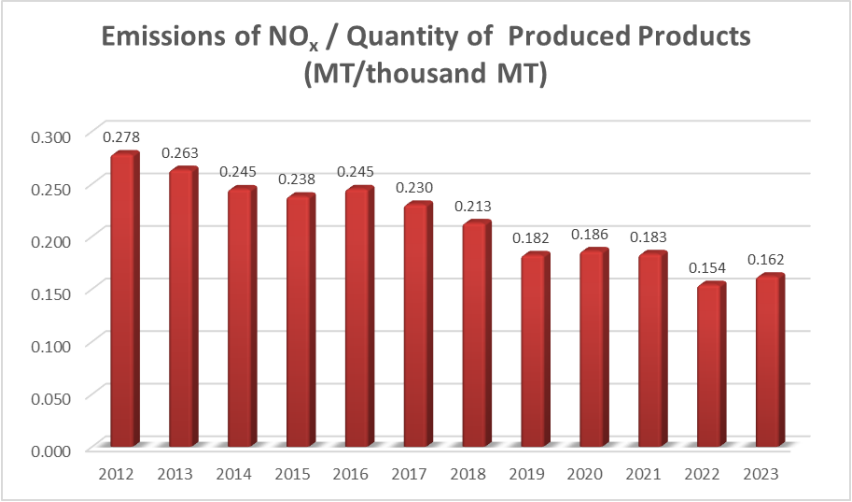
emissions and the specific indexes of sulfur dioxide emissions per quantity of raw material and produced products.

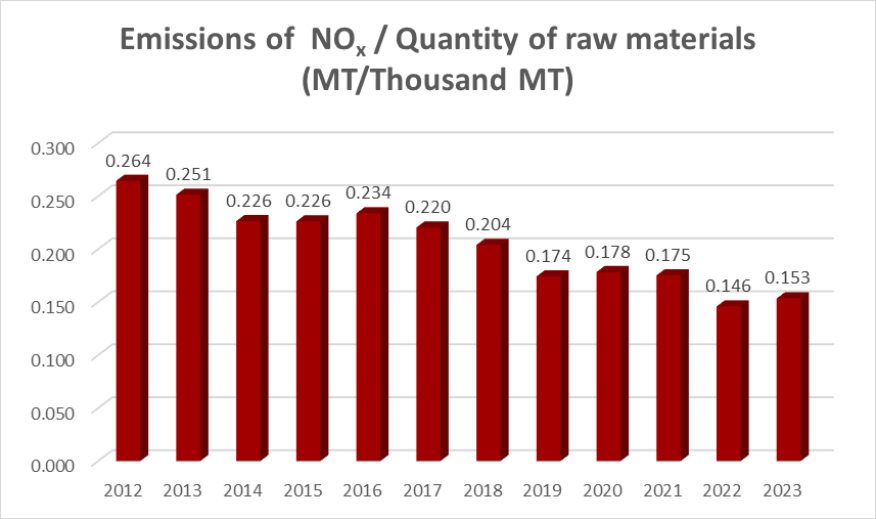






The emissions of Nitrogen Oxides (NOx) for year 2023 are 1,943 MT. The adjusted indices per products produced and per raw materials reflect consistent improvement, as depicted in the following diagrams.





Greenhouse Gases emissions

In regards with the emission of gases that contribute to the greenhouse effect, MOTOR OIL participates to the ETS: Emissions Trading System, according to Directive EU 2003/87. This European Scheme for greenhouse gas emission trading (EU ETS) is the cornerstone of the EU policy against climate change and is the key tool for reducing greenhouse gas emissions in a cost-effective way.

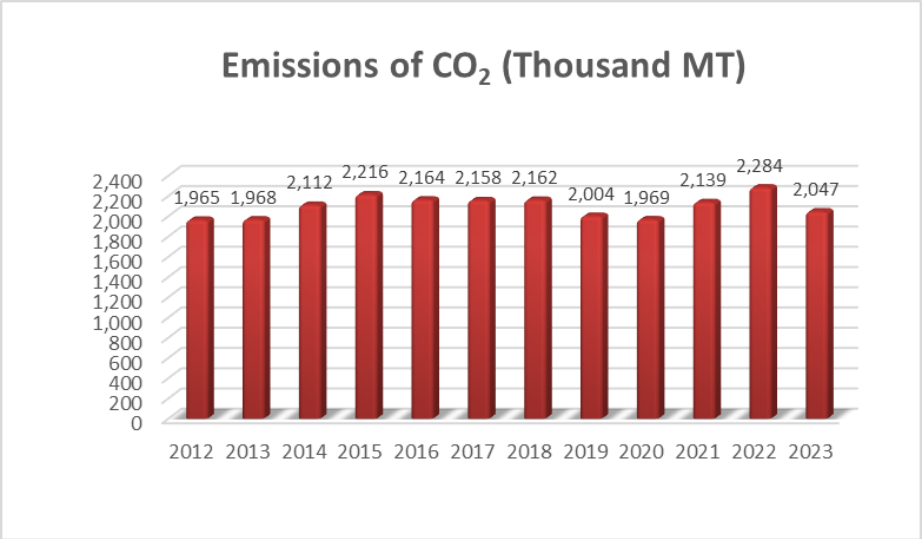
According to these legal provisions, Refinery monitors and reports the annual CO_2 emissions according to an approved Monitoring plan, by the competent authorities. The monitoring plan establishes the framework for the calculation of CO_2 emissions for each process, targeting to an accurate calculation of emissions as possible.

In the ETS context the refinery:

- reports the emissions annually, after verification by an accredited certification body,
- uses calculation methodology based on either European standards or in the analytical results as created by the accredited refinery laboratory according to ISO 17025: 2017.

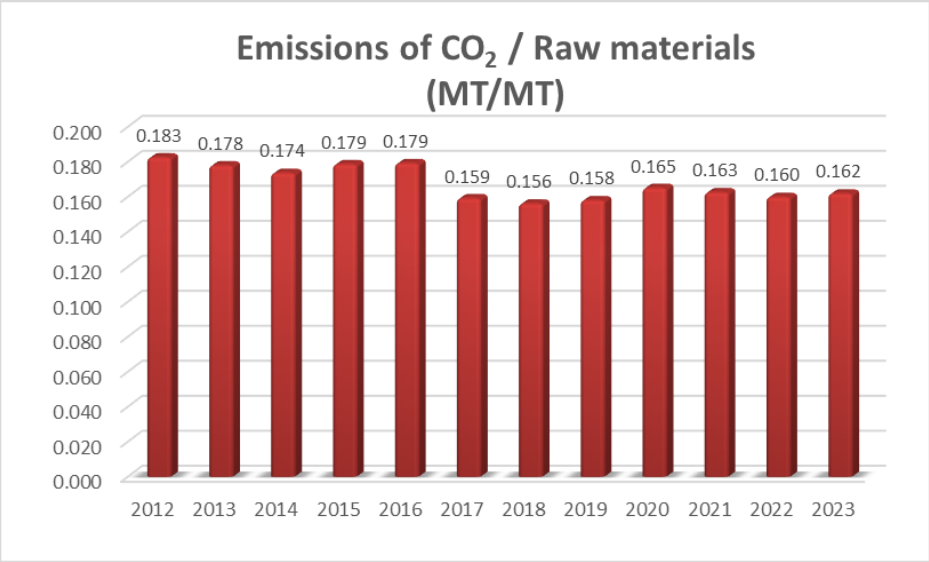
In addition to reporting its emissions, the refinery has faced the challenge of planning its strategy for the next decade, where the European Union has submitted a plan to further reduce emissions, from all productive sectors by at least 55% by 2030, compared to 1990, as well as climate neutrality by 2050.

Based on the above the total Carbon dioxide emissions for 2023 were 2,047,197 tones. The annual emissions of carbon dioxide over the last years are shown at the diagram below.

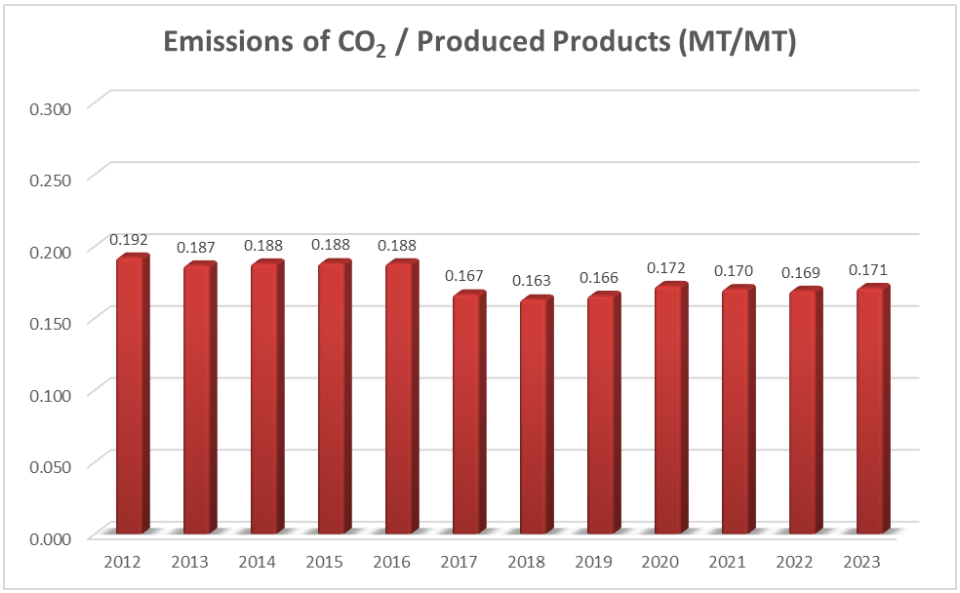


The reduced quantities of carbon dioxide emissions in 2023 compared to the previous two years are due to the relatively lower quantities of products produced by the Refinery in 2023.

The specific carbon dioxide emissions (MT CO_2 / MT of raw materials) for the last years are shown at the following diagram.

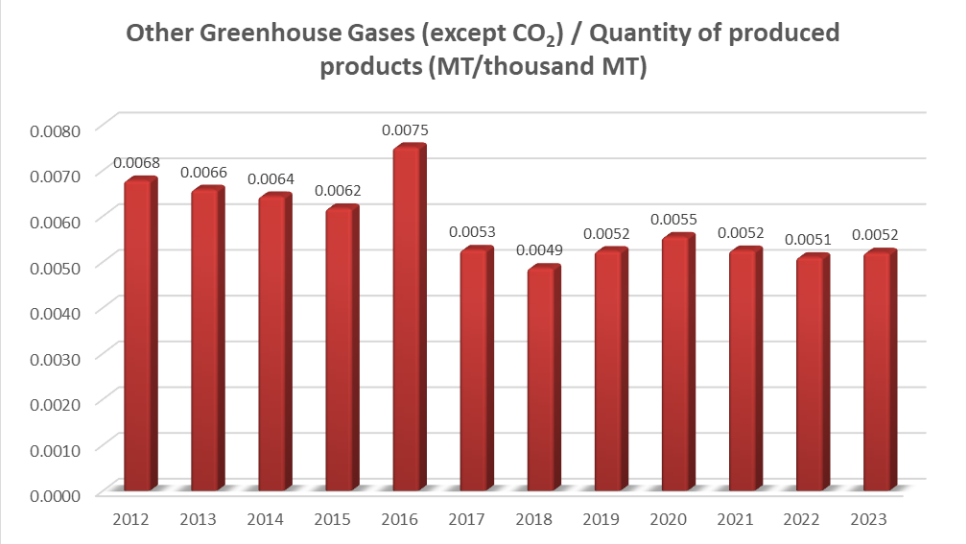


The specific carbon dioxide emissions (MT CO_2 / MT of produced products) for the last years are shown at the following diagram.



Regarding the CO_2 emissions, there is a stabilization of the specific index of CO_2 / quantities of raw materials and final products, and this is due to the operation of the environmental protection and energy optimization projects and investments, which has been completed, as well as to the improved control and monitoring of emissions from the various sources.

It should also be noted that the quantities of greenhouse gas emissions except CO_2 (concerning emissions of CH_4, HCFCs, SF_6, HFCs and N_2O) for 2023 were 62.61 MT and the specific index per quantity of produced products are shown at the table below.



In particular, the emissions of greenhouse gases other than CO_2 during the last years, are shown in the table below:

	2017	2018	2019	2020	2021	2022	2023
CH_4 (kg)	47,213	46,356	45,471	45,689	47,348	48,259	45,146
HFCs (kg)	0	0	0	0	0	0	0
N_2O (kg)	18,969	18,133	17,876	17,630	18,612	19,968	17,460
SF_6 (kg)	0	0	0	0	0	0	0
HCFCs (kg)	0	0	0	0	0	0	0
Dioxins and Furans (kg)	$2.49*10^{-5}$	$2.42*10^{-5}$	$2.20*10^{-5}$	$2.17*10^{-5}$	$2.14*10^{-5}$	$2.62*10^{-5}$	$3.52*10^{-5}$
Total kg	66,182	64,489	63,346	63,319	65,960	68,227	62,606
Total MT	66.18	64.49	63.35	63.32	65.96	68.28	62.61

Emissions of Volatile Organic Compounds (VOCs)

With the target of reduction and control of Volatile Organic Compounds, the Company has implemented amongst other a series of actions that include the reduction of diffused emissions coming from different sources.

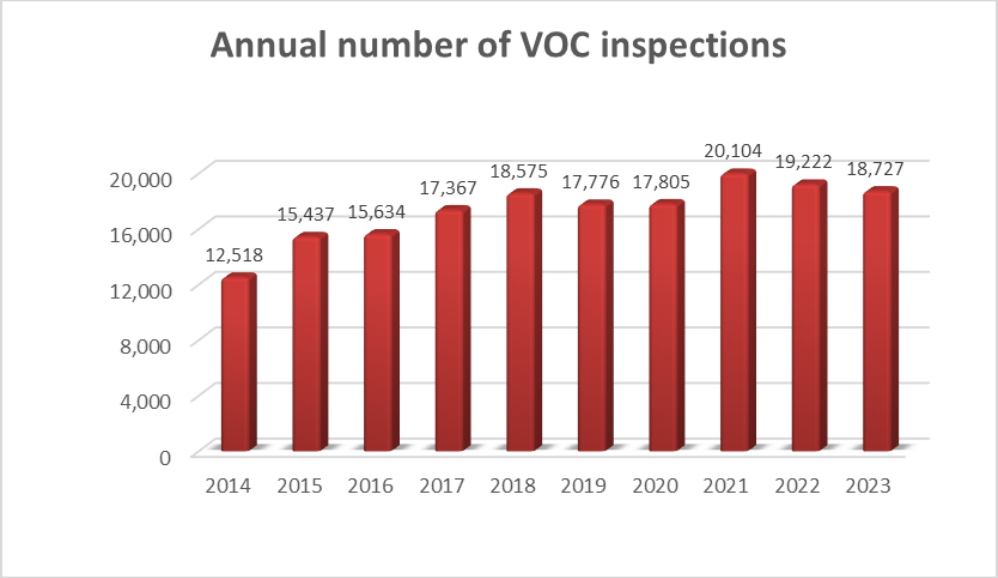
Diffused emissions of Volatile Organic Compounds, is a chemical and oil industry characteristic that is not only a source of pollution but also a cause of forgone profits and loss of products for the industry. Thus, the goal of reducing such emissions is dual. The anti-pollutant measures taken in order to reduce the emissions coming from oil product storage and distribution units, include the best available techniques in the design phase of equipment for product handling and storage, as well as regular inspections and maintenance of all units, which is very crucial in emissions control. In order to reduce the emissions arising from the loading of tank trucks, a vapour recovery unit has been installed, in conformity with current legislation, which is the most effective and globally accepted measure for minimizing such emissions. Also, a new Vapor Recovery Unit (VRU) at the docking area, is at the construction phase.

In accordance with the requirements of Decision 2014/738/EU, a Leak Detection And Repair (LDAR) program is implemented for the monitoring of diffuse emissions in order to limit them. Within the framework of the program, a significant number of points of equipment in which there is a possibility of leakage (e.g. valves, flanges, etc.) is periodically checked according to the EPA 21 standard with portable equipment.

Additionally, the leakage detection has been enhanced with the new method of optical gas imaging (OGI). In case a leakage is detected then it is restored promptly. For the year 2023 no leakage of volatile organic compounds (VOCs) has been discovered, as set out in EPA 21 standard and the current Approved Environmental Terms.

In addition to this, new equipment is being operated for the detection of leaks by the method of optical gas imaging (OGI).

The number of inspections, within the LDAR program, for the year 2023 is 18,727. The following diagram shows the annual number of inspections for the last years.



The monthly distribution of the above inspections, per refinery unit are shown in the following table.

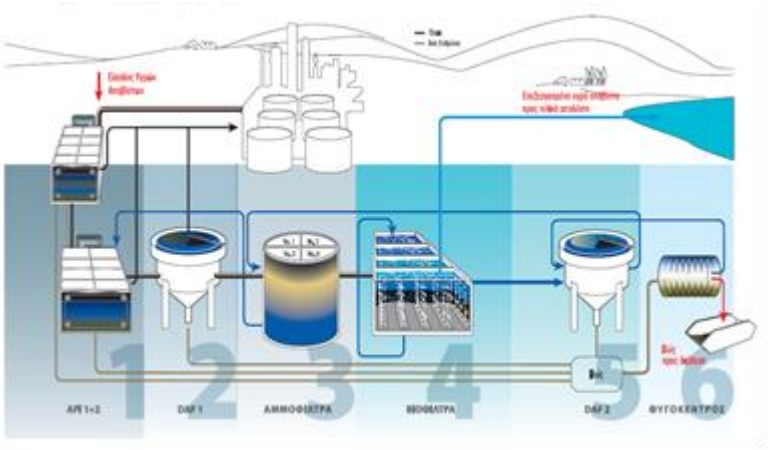
Month / DPT	Jan-23	Feb-23	Mar-23	Apr-23	May-23	June-23	July-23	Aug-23	Sept-23	Oct-23	Nov-23	Dec-23	TOTAL 2023
FUELS	407	407	407	407	407	0	407	407	407	408	407	407	4,478
GASOLINES	425	425	457	319	425	413	445	533	425	473	445	336	5,121
FCC	104	104	104	104	104	104	104	104	104	104	104	104	1,248
LUBES	36	34	35	35	35	36	17	35	35	53	36	34	421
OFFSITES	90	87	87	84	84	65	78	85	76	107	70	81	994
JETTY	35	47	25	34	14	24	35	24	47	34	14	24	357
MHC	0	0	867	0	0	867	0	0	867	0	0	867	3,468
NNC/U7100	0	350	168	200	150	168	200	150	168	200	150	168	2,072
TRUCK LOADING	0	0	0	284	0	0	0	0	0	0	284	0	568
TOTAL	1,097	1,454	2,150	1,467	1,219	1,677	1,286	1,338	2,129	1,379	1,510	2,021	
											Grand Total		18,727

3.1.2 Waste Water Treatment

Industrial wastewater produced by the Refinery's production units is routed, into the industrial wastewater treatment plant, where it is subjected to a sequence of treatment steps that are depicted on the diagram that follows (API Oil Separators, Dissolved Air Floatation (DAF) units, sand filters, biofilters, sludge treatment). At the same time, sanitary wastewater is treated in the sanitary wastewater treatment plant.

The goal of industrial and sanitary wastewater treatment systems is the full treatment of wastewater so that the treated effluent is in compliance with the requirements of current legislation. Wastewater effluents are monitored on a daily basis, within the framework of Approved Environmental Terms, whereas a number of programs are implemented aiming at efficiently dealing with the effects of malfunctioning of the treatment units, the automation of their functioning and the optimization of their performance. The quality characteristics of the effluents are shown in the table that follows, where the measured values are much lower than the limit values defined by the legislation.

The results of the measurements are in conformance with the corresponding threshold limits of the parameters, as they are set in the Approved Environmental Terms of the Refinery



Concentration of polluting parameters at the outlet of the industrial wastewater treatment plant:

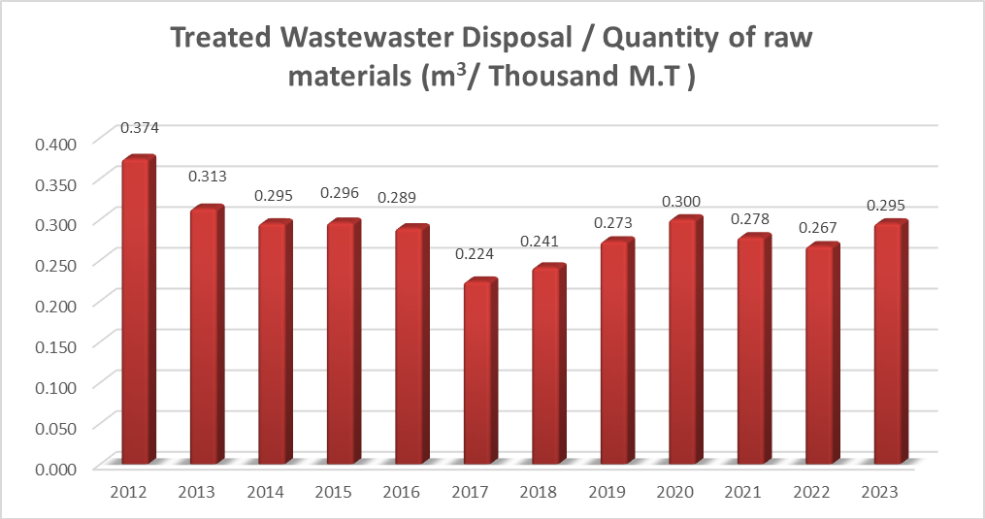
As far as the results of Industrial Waste of the Waste Water Treatment Plant, are shown below:

A/A	Parameter	Yearly Average Values 2023	Limit Values (Environmental terms)
1	pH Indicator	7.3	6.0-9.0
2	Temperature (°C)	30.5	35
3	BOD_5 (mg/l) - Biochemical Oxygen Demand	24.3	40
4	COD (mg/l) - Chemical Oxygen Demand	109.8	125
5	Total NH_3 (mg/l)	13.5	15
6	Sulfides (mg/l)	1.2	2
7	Suspended solids (mg/l)	18,6	25

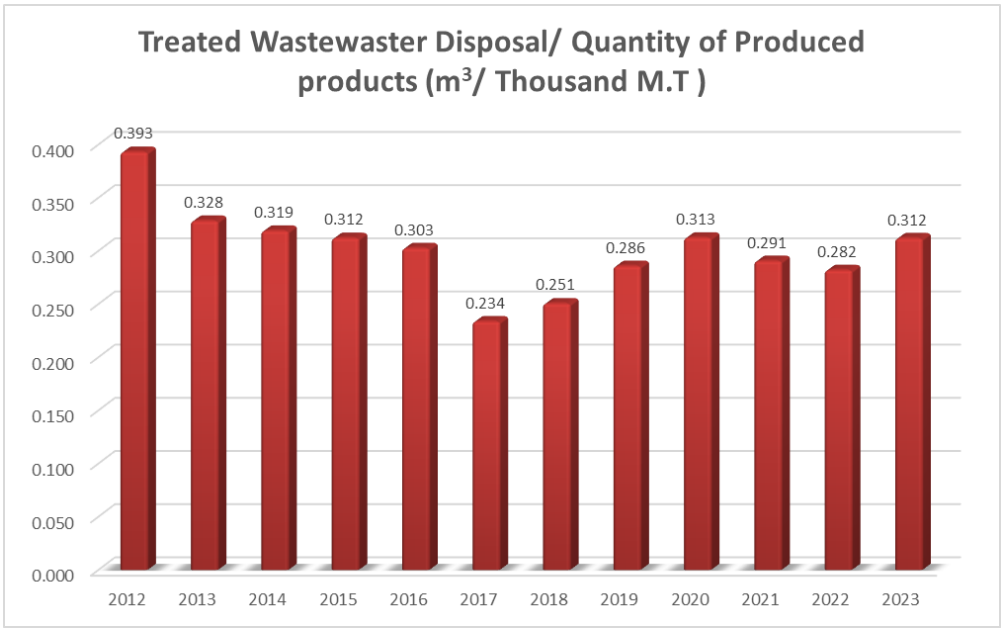
Hydraulic and polluting load of the industrial wastewater treatment plant is as follows:

A/A	Parameter	Average values 2016	Average values 2017	Average values 2018	Average values 2019	Average values 2020	Average values 2021	Average values 2022	Average values 2023
1	Discharge (m^3/day)	9,592	8,323	9,133	9,479	9,752	10,009	10,438	10,340
2	BOD_5 (kg/day)	236	203	224	237	242	234	256	248
3	Suspended solids (kg/day)	188	167	193	209	209	199	193	193

In the following diagram, is shown the specific volume of treated wastewater (m^3/ MT of raw materials) for the last years.



Furthermore, the specific volume of treated wastewater per quantity of finished products for the last years, is as follows:



At the following table the results of BTEX in the output of industrial wastewater treatment plant for the year 2023, are presented.

Parameter	Threshold Limits	2023 Average Values
	mg /l	mg/l
Benzene	0.05	<0.005
Toluene	-	<0.04
Xylene	-	<0.01
Ethyl benzene	-	<0.01

Sanitary Wastewater Treatment Plant Outlet

A/A	Parameter	Average 2018 values	Average 2019 values	Average 2020 values	Average 2021 values	Average 2022 values	Average 2023 values	Threshold Limits
1	pH	7.5	7.6	7.5	7.5	7.6	7.5	6-9
2	BOD5 (mg/l)	20	21	22	18	19	27.1	40
3	COD (mg/l)	48	60	56	52	54	83.5	150
4	Suspended solids (mg/l)	13.6	13.7	12.1	10.8	11.5	12.7	40.0

3.1.3 Solid Waste Management

Solid waste produced during the refinery's operation is collected and processed according to the relevant legislation:

- Non-hazardous solid waste is managed according to L.4685/2020, as applicable.
- Hazardous waste is managed according to the Ministerial Decision 13588/725/06 (O.G.G. 383/B), Ministerial Decision 24944/1159/2006 (O.G.G. B/791), Ministerial Decision 62952/5384/2016 (O.G.G. B/4326) and Law 4819/2021 (O.G.G. A/129), as applicable
- Waste that falls under the alternative management category comply with Law No.4819/2021 (O.G.G A129) and the regulatory requirements issued under the Law 2939/2001 (O.G.G A179)

The Refinery is aiming at the increase of recycling and re-usage of the produced waste. The amount of solid waste that was disposed and managed outside the refinery premises, over the last years, is shown in the following table.

Solid waste Management (MT / year)

Code	Description	2017	2018	2019	2020	2021	2022	2023
050117	Bitumen	3.03		10.49	7.32	31.43		20.19
050199	Waste not otherwise specified	422.736	347.365	402.347	331.659	334.17	278.22	131.355
080317*	Waste printing toner containing hazardous substances		0.37					0.020
120113	Welding wastes							0.24
120117	Waste blasting material other than those mentioned in 120116	791.71	700.68	1,315.57	318.03	536.76	442.37	578.57
130208*	Other engine, gear and lubricating oils	201.078	33.00	4.72	29.51	9.31	3.63	7.98
150101	Paper and cardboard packaging	14.84	15.09	26.56	19.96	27.4	23.0	16.61
150102	Plastic packaging							1.29
150103	Wooden packaging	35.98	169.30	203.78	191.79	402.67	360.94	267.44
150104	Metallic Packaging		2.805					0.17
150106	Mixed Packaging	919.49	824.30	1,073.98	1,021.29	834.96	828.56	938.88
150110*	Packaging containing residues of or contaminated by dangerous substances	27.05	6.94	5.26	5.09	7.82	16.26	49.57
150202*	Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protecting cloths contaminated by dangerous substances	84.2	40.73	250.259	10.39	18.9	13.55	24.83
160104*	End-of-life vehicles				4.24			

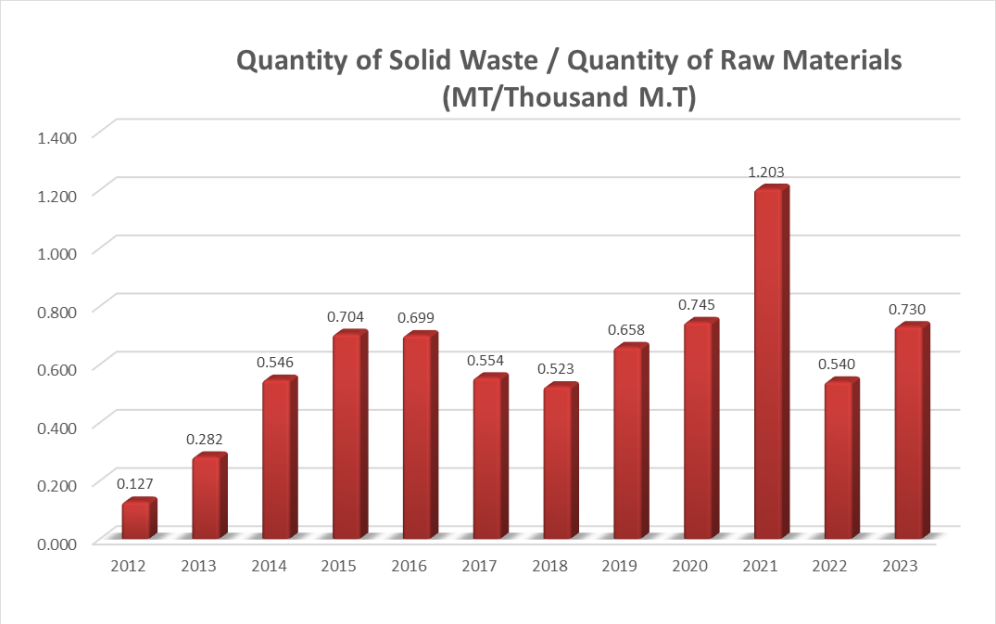
Code	Description	2017	2018	2019	2020	2021	2022	2023
160213*	Discarded equipment containing hazardous components			0.763		0.883		
160305*	Organic wastes containing hazardous substances			8.24	7.1		12.87	
160504*	Gases in pressure containers (including halons) containing hazardous substances				0.796			
160506*	Laboratory chemicals, consisting of or containing hazardous substances, including mixtures of laboratory chemicals		0.15	0.07		0.07	0.07	
160601*	Lead batteries	5.56		14.92	25.37	6.87	5.91	7.96
160602*	Batteries Ni, Cd			4.28		0.61		
160708*	wastes containing oil				6.12			
160802*	Spent catalysts		52.57	7.7	878.66			494.25
160804	Spent fluid catalytic cracking catalysts (except 160807)	2,344.79	1,962.636	2,679.74	3,173.67	2,773.81	2,948.91	2,643.186
160807*	spent catalysts contaminated with hazardous substances				278.93	2.51		57.71
161105*	linings and refractories from non-metallurgical processes containing hazardous substances	67.16	90.77					11.91
170401	Copper, bronze, brass							1.64
170402	Aluminium	4.01	1.15	0.47	0.6		5.65	18.92
170405	Iron and Steel	1,710.38	1,374.32	1,296.12	1,062.81	1,726.95	1,313.87	2,026.42
170411	Cables other than those mentioned in 17 04 10	4.86	86.89	3.22	15.1	40.16	19.69	5.24

Code	Description	2017	2018	2019	2020	2021	2022	2023
170604	Insulation materials other than those mentioned in 17 06 01 and 17 06 03						36.43	121.76
170605*	Construction materials containing asbestos		7.76	7.95	5.28	14.12		30.70
170904	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03						39.97	322.71
180103*	Waste whose collection and disposal is subject to special requirements in relation to prevent infection	0.095	0.083	0.01	0.04	0.057	0.111	0.034
190205*	Sludges from physico/chemical treatment containing dangerous substances	474.96	1,069.38	187.35	386.6	182.53	1,341.63	1,462.13
190305	Stabilised wastes other than those mentioned in 19 03 04			455.05	109.62	8,640.98		
191302	Solid wastes from soil remediation other than those mentioned in 19 13 01	371.51	451.22	379.03	982.61	150.32		
200101	Paper and Cardboard	13.59						
200121*	Fluorescent tubes and other mercury-containing waste	0.62	0.37	0.87	0.3	0.28	0.44	0.43
200125	Edible oil and fat						0.98	0.743
200132	Medicines other than those mentioned in 20 01 31							0.014

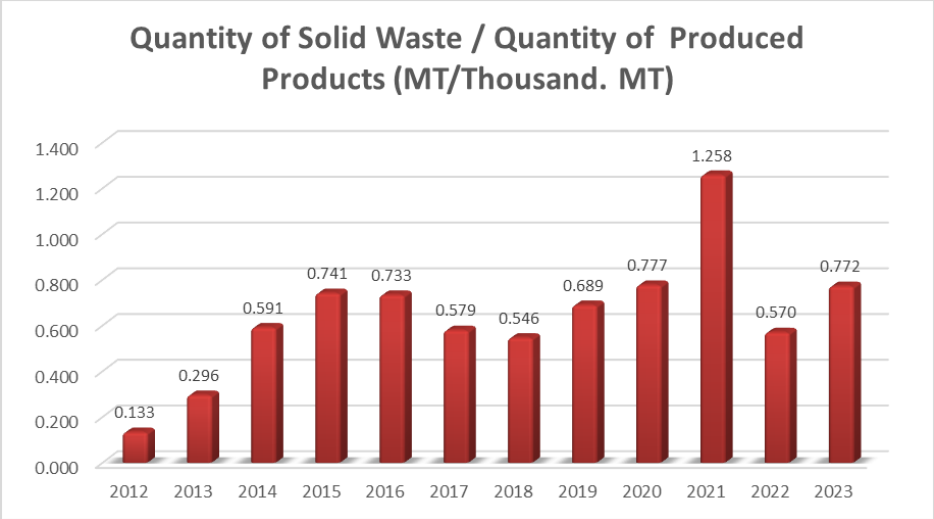
Code	Description	2017	2018	2019	2020	2021	2022	2023
200133*	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries			0.37		0.12	0.17	0.25
200135*	Discarded electrical and electronic equipment	6.79	3.405	1.116		4.907		
200136	Discarded electrical and electronic waste	0.64		0.007	0.02	0.15	0.005	
200139	Plastics					65.01		
200307	Bulky wastes			0.49				

The total quantity of solid waste handled by MOTOR OIL via appropriately licensed companies in 2023 is 9,243.152 tons.

The specific quantity of solid waste per quantity of raw materials for the last years is as follows:



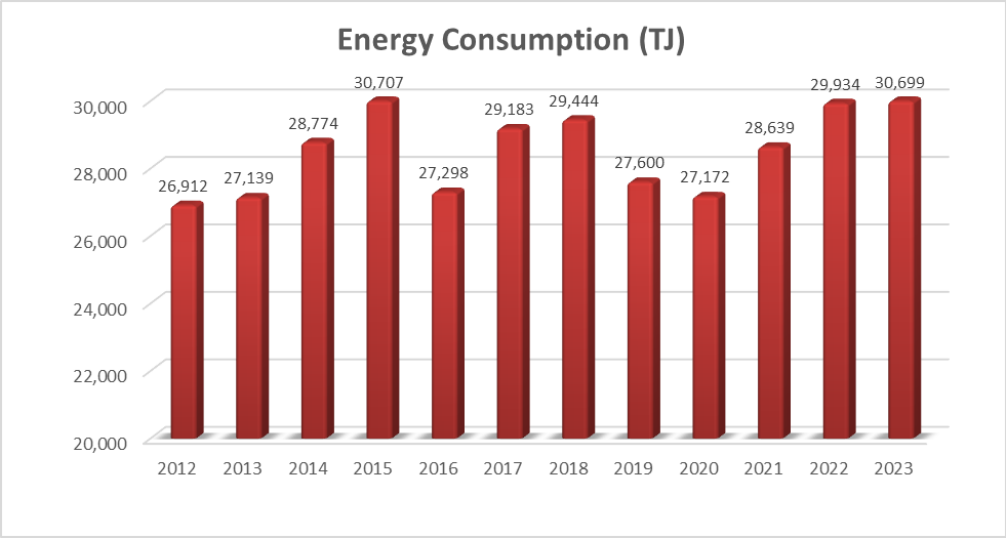
The specific quantity of solid waste in relation to the production (MT / thousand MT of produced products), is shown below:



3.1.4 Energy Consumption

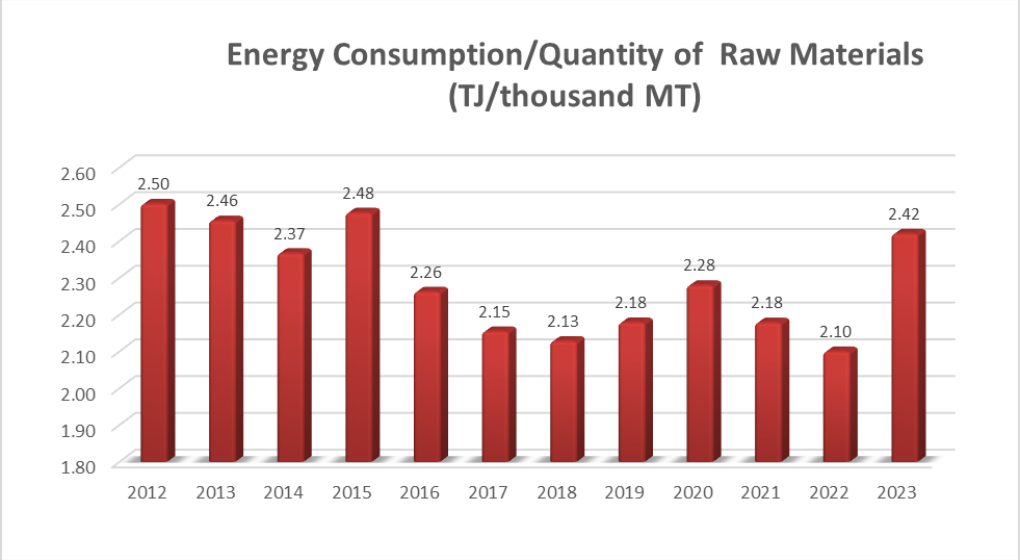
The energy consumption of the refinery includes the fuel used in combustion processes and the electric power for the operation of mechanical equipment, part of which is produced by the Power and Steam co-Generation Plant. The refinery fuel mixture includes liquid (fuel oil), with the possibility of adding biomass / co-processed renewable diesel, and gaseous fuels mixture that consists of self-produced gas fuel, natural gas and liquified gas.

The projects that were completed in the previous years, (mainly the introduction of natural gas in the refinery fuel mixture in 2008, the extensive maintenance of gas turbines, the upgrade of the preheating furnaces, the increase of the recovery level of condensates, the installation of an Advanced Control System, the installation of an Advanced Control System as well as an Energy Optimization system, the use of hot streams to preheat cold streams, the maximization of refinery gas usage, the procurement of more energy-efficient equipment etc), combined with the systematic monitoring of energy efficiency and the preventive maintenance schedules, contributed to the significant reduction of the refinery energy consumption over the last years, confirming the optimal energy management. Thus, the energy consumption by the refinery's processes in 2023 is 30,699 TJ.



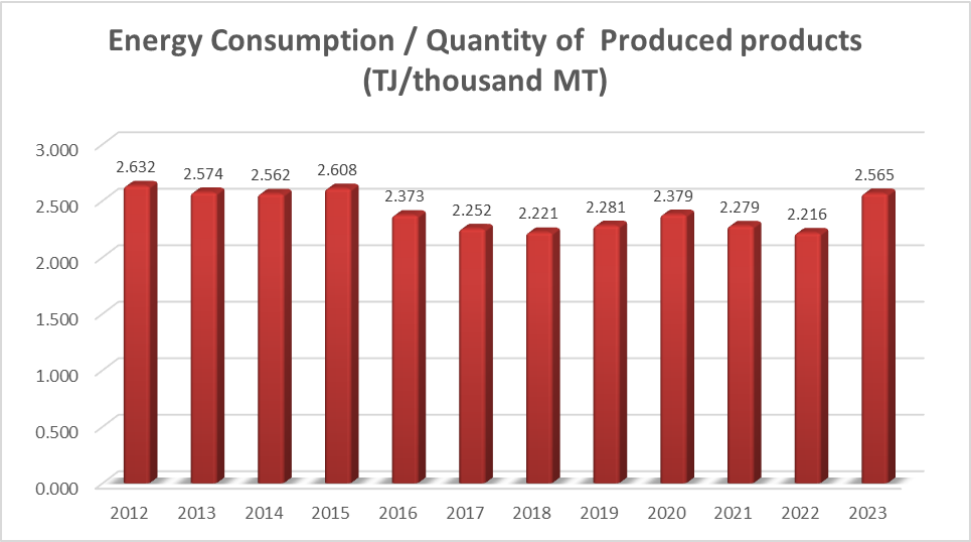
The increase in energy consumption for the year 2023 is mainly due to the start-up of the new gasoline production complex.

In following diagram, it is shown the specific index of Energy consumption per quantity of raw materials.



It must be noted that the usage of raw material volume (instead of end product volume) as a comparison basis is justified since this measure is commonly and internationally acceptable as benchmark for the assessment of the impact on the environment from crude refining premises (bref: IPPC reference document on best available techniques for mineral oil and gas refineries) and at the same time allows the correct interpretation and timeliness evaluation of the environmental efficiency of the refinery.

The specific index of Energy / thousand MT of produced products is shown below:

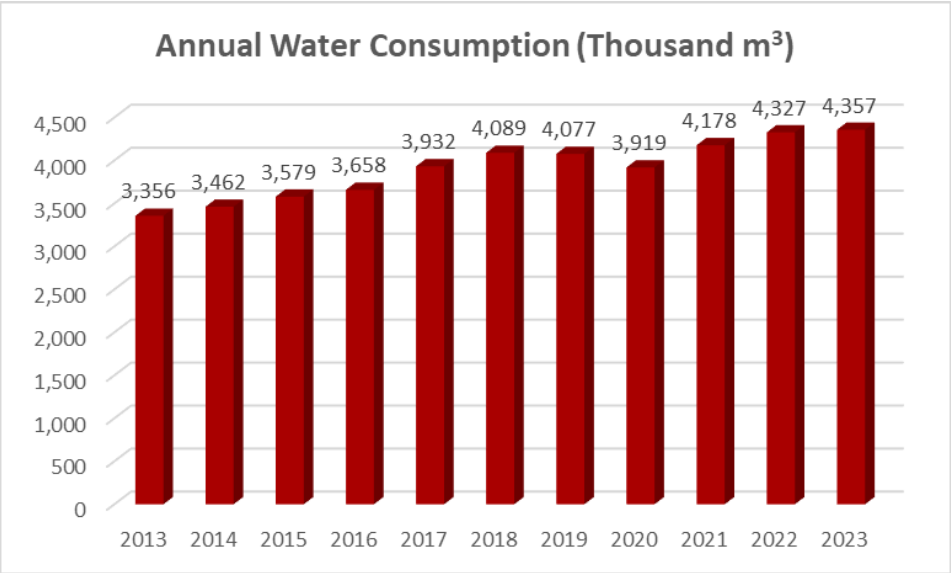


Also, in 2023 the energy losses were kept at a relatively low level as shown in the bellow diagram.

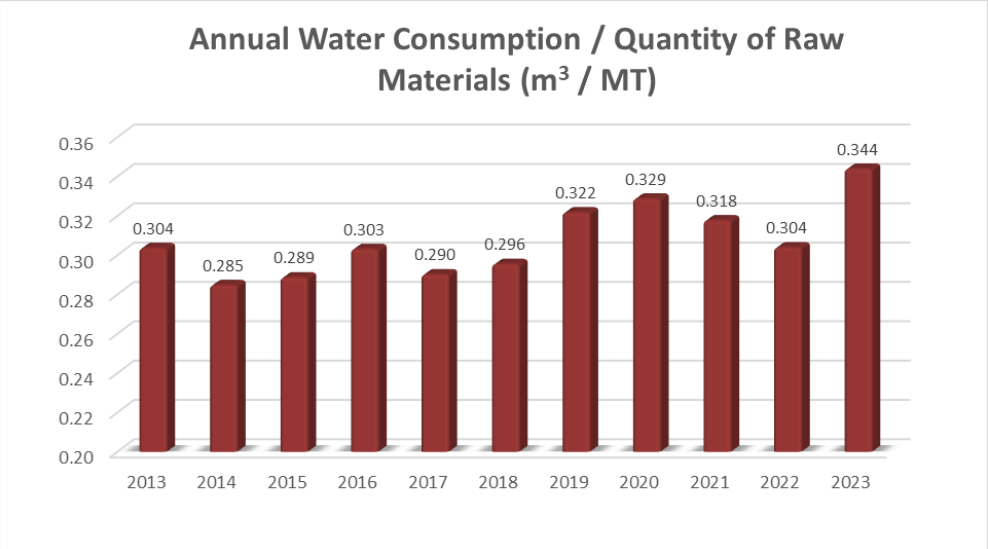
3.1.5 Water Consumption

The water used for the Refinery's various operations is obtained from the treatment of seawater at the desalination plants.

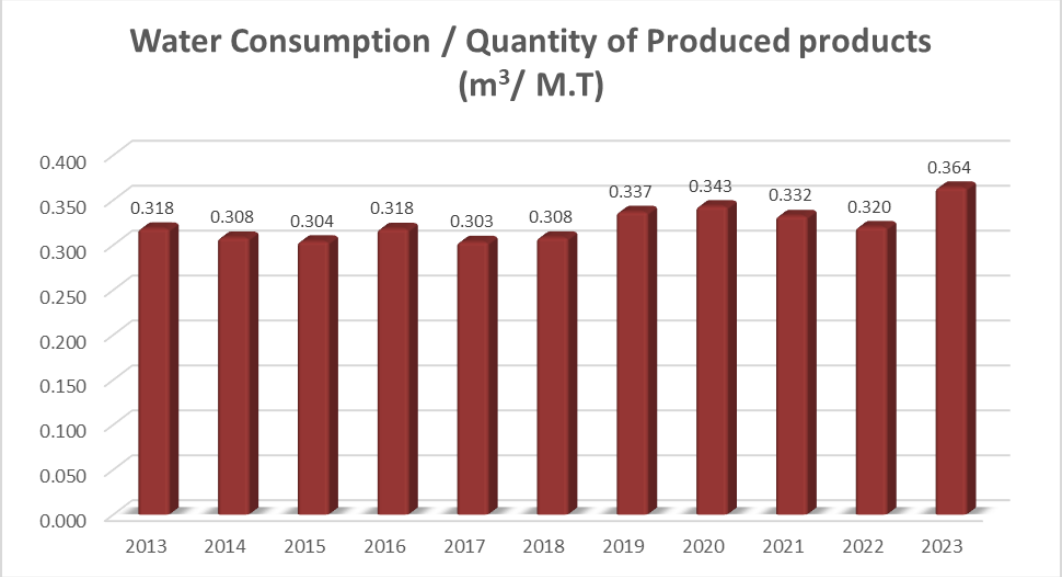
The quantity of water consumed during the last years, is shown at below diagram.



The specific index of water consumption per quantity of raw materials for the last years is shown at the diagram below and is an indicator of efficient use of resources.



The specific index of water consumption per unit of produced products (m^3 / thousand M.T), is shown at the following diagram.



It should be emphasized that the water being used in the manufacturing process comes exclusively from the returns of the refinery's cooling water, and consequently, there is no negative impact on the natural resources of the area whatsoever.
It is also pointed out that, in the context of the company's social contribution, amounts of water covering the water supply needs of nearly two hundred neighboring residences are granted free of charge.

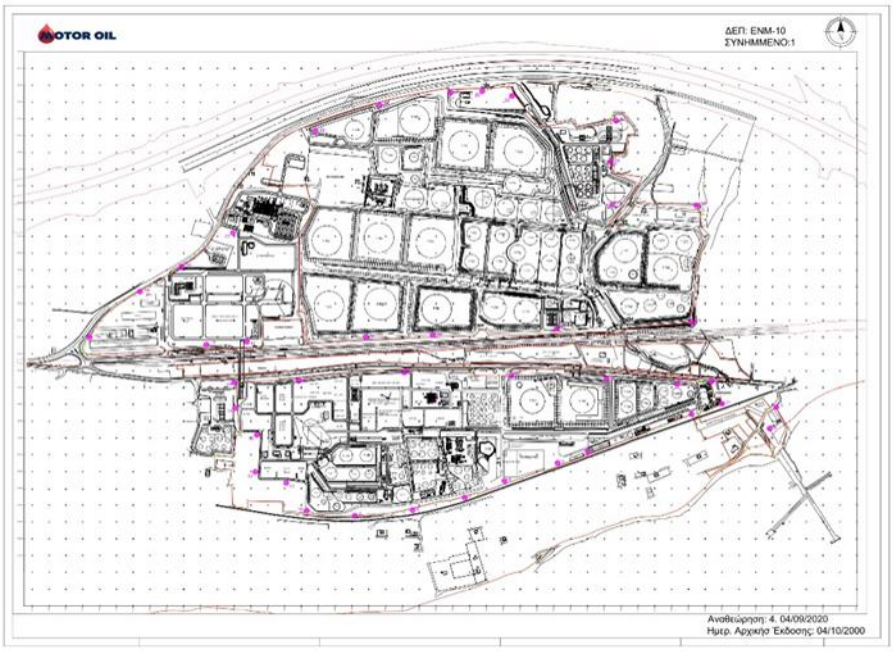
3.1.6 Noise

Having set as a goal the reduction of environmental noise levels at refinery boundaries and in compliance with the current Environmental Terms, the following Best Available Techniques are applied in accordance with Decision 2014/738/EU:

- Noise levels are monitored on a regular basis by conducting measurements at multiple locations around the Refinery.
- The use of equipment that produces excessive noise is limited to separate structures / units either in the design phase of new units, or in case of noise detection that exceeds the legislative limits on the perimeter of the installation.
- Use of sound barriers after evaluation of noise levels during the installation. It is noted that in the context of reducing noise emissions, sound barriers have been installed in

the ventilation units of the wastewater treatment plant, in the blowers of M7700 and in the gas turbine GT5.

The positions of the noise monitoring program are presented in the following map:



The results of the noise monitoring program for the year 2023 are presented in the following table and it is proven that they do not exceed the legal limit of 65 dB (A), at the boundaries of the facility.

It shall be noted that the threshold value according to clause 3.3 of the amendment to the AEPO YPEN/DIPA/94624/6221/23-11-2023 is 65 dBA around the entire perimeter of the refinery, due to changes in the land use map in the area (industrial zone with high noise levels).

Locations	**Average Measurements January 2023 (dBA)**	**Average Measurements June 2023 (dBA)**	**Average Measurements October 2023 (dBA)**	**Threshold Limits (dBA)**
Perimeter of the refinery	56.2	56.1	55.9	65.0
South perimeter (points 1 to 15)	53.2	53.5	52.6	65.0

4. OBJECTIVES

4.1 New objectives and programs

MOTOR OIL constantly implements new programs and actions aiming at improving its environmental performance, while setting new objectives for the future. The objectives and programs that are planned for the following years are presented in the following table.

OBJECTIVES AND PROGRAMS	2024	2025	2026
AIR			
Reduction of air emissions (SO_2, NO_x, suspended solids, CO) per MT of feeding raw materials by 25% following the modernization of the furnaces of the vacuum distillation unit U200	●		
Reduction of air emissions (SO_2 by 10% and NO_x by 19%) through upgrade of F1501	●		
CO_2 emissions reduction (1,260 MT/y) from electricity production through photovoltaic panels installation (2.19 MW)	●		
Reduction of CO_2 emissions from the operation of the new M-8600 isomerism unit following its design without clave. Deflection of 7.500 MT CO_2/year in comparison with the current unit M-2500.	●	●	
ENERGY			
Improvement of the energy efficiency of the atmospheric distillation unit by rearranging the heat exchangers and replacing the clave's fan with an improved energy efficiency class one.	●		
Continuous monitoring and replacement program for the stream traps	●		
Gradual replacement of motors with energy class IE4 and higher	●	●	
Condensate routing for the building heating thus saving ≥300MW per year, i.e., 60 MT of CO_2 per year	●		

Installation of the Energy Optimizer by a globally renowned third party for the optimal energy operation of the Refinery's equipment.	●		
Conducting Energy Project with energy improvement proposal for the whole Refinery	●		
Provision of new heat exchangers for superheated high pressure steam production from hot fumes of 11 TJ approximately, decreasing to this effect the usage of fuel in hot-water tanks for steam production.	●		
Fuel saving in conventional boilers by 58 kMT/year and reduction of total CO_2 emissions by 7.5% due to the installation and operation of a new High-Efficiency Combined Heat and Power (CHP) Unit with an energy efficiency of approximately 90% using natural gas as fuel.	●	●	●

REGISTRATION INFORMATION / NEXT ENVIRONMENTAL STATEMENT

The present Environmental Statement concerns the year 2023. The next Environmental Statement for the year 2024 will be edited, verified and issued in May 2025.

Mr. Spyros J. Sofos, Integrated Management System Section Head is responsible for issuing the Environmental Statements.

1. ORGANIZATION	
Company name	MOTOR OIL (HELLAS) - CORINTH REFINERIES S.A.
Address	Agioi Theodoroi, P.O BOX 23, 20100
City	Corinth
Postal Code	20100
Country	GREECE
Contact Person	S. J. Sofos
Telephone	+30 27410 - 41800
Fax	+30 27410 - 48255
e-mail address	sofossp@moh.gr
Company website	www.moh.gr

Public access to the environmental statement or the updated environmental statement	
a) printed form	YES
b) electronic form	YES
Registration number	
Registration date	
Suspension date	
Deletion date	
Date of the next verification of environmental statement	May 2025
Date of the next updating of environmental statement	May 2025
Application for deviation according to article 7	NO
Code of activities NACE	DF.19.20
Personnel headcount	1,096
Turnover or Total Assets	9,320,638,000 €
2. LOCATION OF ACTIVITIES	
Company name	MOTOR OIL (HELLAS) - CORINTH REFINERIES S.A.
Address	Agioi Theodoroi, P.O BOX 23
City	Corinth
Postal code	20100
Country	Greece
Contact Person	S. J. Sofos

Telephone	+30 27410 - 41800
Fax	+30 27410 - 48255
e-mail address	sofossp@moh.gr
Company website	www.moh.gt
Public access to the environmental statement or the updated environmental statement	
a) printed form	YES
b) electronic form	YES
Registration number	
Registration date	
Suspension date	
Deletion date	
Date of the next verification of environmental statement	May 2025
Date of the next updating of environmental statement	May 2025
Application for deviation according to article 7	NO
Code of activities NACE	DF.19.20
Personnel headcount	1,096
Turnover or Total Assets	9,320,638,000 €
3. ENVIRONMENTAL CERTIFICATOR	
Name	BUREAU VERITAS HELLAS S.A
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City	Pireas
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e-mail address	grc_scscer@gr.bureauveritas.com
Number of registration or accreditation	EL-V-0007 (246-10)
NACE codes	NACE 19
Accreditation or Certification institution	Ε.ΣΥ.Δ
Athens, 07/06/2024	
Organization Representative Signature	

Corinth 05 June 2024

Spyros J. Sofos

Integrated Management System Section Head

ANNEX I - LEGISLATION LIST

Subject	National and European Legislation	Description	Amendments
Environmental Permissions	Law 1650/86 (Gazette No-160 A')	For the protection of the environment.	L. 5037/2023 (GG 58/A` 28.3.2023) L. 4964 (GG 150/B` 30.07.2022) L. 4819/2021 (GG 129/A` 23.7.2021) L. 4610/2019, (GG 70/A/7.5.2019) L. 4492/2017, (GG 156/A/18.10.2017) L. 4411/2016, (GG 142/A/3.8.2016) L. 4409/2016, (GG 136/A/28.7.2016) L. 4042/2012, (GG 24/A/13.2.2012) L. 4014/2011, (GG 209/A/21.9.2011) L. 3536/2007, (GG 42/A/23.2.2007) L. 3164/2003, (GG 176/A/2.7.2003) L. 3010/2002, (GG 91/A/25.4.2002) L. 2947/2001, (GG 228/A/9.10.2001) L. 2742/1999, (GG 207/A/7.10.1999)

Subject	National and European Legislation	Description	Amendments
	Ministerial Decree 69269/5387/90 (Gazette No 678/B 25.10.90), as amended and is in force	Categorization of activities and projects. Content of study for the Environmental Impacts, determination of content for special environmental studies and other relevant provisions according to the law 1650/86.	MD 11014/703/Φ104/2003, (GG 332/B/20.3.2003) MD 15393/2332/2002, (GG 1022/B/5.8.2002) MD 84230/1996, (GG 906/B/24.9.1996) MD 30557/1996, (GG 136/B/6.3.1996) MD 1661/1994, (GG 786/B/20.10.1994)
Environmental Permissions	Law 3325/2005 (Gazette No 68A/2005)	Foundation and operation of industrial – manufacture installations in the frame of a sustainable growth and other provisions.	L. 5069/2023 (GG 193/A` 28.11.2023) L. 4605/2019 (GG 52/A` 1.4.2019) L. 4549/2018, (GG 105/A/14.6.2018) L. 4530/2018, (GG 58/A/30.3.2018) L. 4442/2016, (GG 230/A/7.12.2016) L. 4403/2016, (GG 125/A/7.7.2016) L. 4254/2014, (GG 85/A/7.4.2014) L. 4155/2013, (GG 120/A/29.5.2013) L. 4072/2012, (GG 86/A/11.4.2012) L. 3982/2011, (GG 143/A/17.6.2011)

Subject	National and European Legislation	Description	Amendments
	Ministerial Decree 1958/2012 (Gazette No 209/A/2011)	Categorization of public and private projects and activities according to the article 1 of law 4014/21.09.2011.	MD. 92108/1045/Φ.15/2020 (GG 3833/B` 9.9.2020) MD ΔΙΠΑ/οικ.37674/2016, (GG 2471/B/10.8.2016) MD. 173829/2014, (GG 2036/B/25.7.2014) MD 65150/1780/2013, (GG 3089/B/4.12.2013) MD 166476/2013, (GG 595/B/14.3.2013) MD 20741/2012, (GG 1565/B/8.5.2012)
Environmental Permissions	MD 21697/2012 (Gazette No 224/YODD/--/3.5.2012)	Establishing of a Central Council environmental permitting (KESPA) in accordance with paragraph 1 for article 13 of Law 4014/2011 (209 / A).	
	JMD 1649/45 / Gazette 45B / 15-01-2014	Specialization of processes about receiving opinions and information ways and participation of the public concerned to the public consultation during the environmental licensing of projects and activities of Class A Decision of the Minister of Environment, Energy and Climate Change no. 1958/2012 (Government Gazette A 21), as defined	

Subject	National and European Legislation	Description	Amendments
		in Article 19, paragraph 9 of law. 4014/2011 (Government Gazette A 209), and any other relevant detail.	
Environmental Permissions	MD 170225 (Gazette 135V/27-01-2014)	Specialized of File contents for environmental permitting projects and activities of the Class A, of the Minister Decision of Environment, Energy and Climate Change No. 1958/2012 (B 21) as applicable, in accordance with Article 11 of Law 4014/2011 (A 209), as well as any other relevant detail.	MD. 1915/2018, (GG 304/B/2.2.2018)
	Law 4685/2020 (Gazette 92/A 7/5/2020)	Modernization of environmental legislation, incorporation into Greek legislation of Directives 2018/844 and 2019/692 of the European Parliament and of the Council and other provisions	L. 5106/2024 (GG 63/A` 1.5.2024) L. 5069/2023 (GG 193/A` 28.11.2023) L. 5037/2023 (GG 58/A` 28.3.2023) L. 4964/2022 (GG 150/A` 30.7.2022) L. 4819/2021 (GG 129/A` 23.7.2021) L. 4710/2020 (GG 142/A` 23.7.2020)
	Joint Ministerial Decision 3122.3-15/71164/2021 (O.G.G. 4790/B/18.10.2021	Amendment of the Greek legislation to the Directive (EU) 2019/883 of the European Parliament and of the Council of 17 April 2019 on port reception facilities for the delivery of waste from	

Subject	National and European Legislation	Description	Amendments
		ships, amending Directive 2010/65/EU and repealing Directive 2000/59/EC	
	Ministerial Decision, Ministry of the Environment and Energy/Inspectorate Body/13582/2021 (O.G.G 689/B/22.02.2021)	Methodology for planning regular environmental inspections – Risk assessment and classification in degrees of risk of economic activities that fall under Categories A and B of Article 1, Law 4014/2011, as applicable	
Environmental Permissions	MD RIS/DIPA/17185/1069/2022 (O.G.G 841/B` 24.2.2022)	Amendment and codification of the Ministerial Decision 37674/27-7-2016 "Amendment and codification of the Ministerial Decision 1958/2012 - Classification of public and private projects and activities into categories and subcategories in accordance with par. 4 of article 1 of Law 4014/21.9.2011 (A΄ 209), as amended and in force" (B΄ 2471)	MD ΥΠΕΝ/ΔΙΠΑ/53510/3616/2023 (GG 3327/B` 19.5.2023) MD ΥΠΕΝ/ΔΙΠΑ/64712/4464/2022 (GG 3636/B` 11.7.2022)
	Directive 2011/92/EU	Assessment of the effects of certain public and private projects on the environment	

Subject	National and European Legislation	Description	Amendments
EMAS Regulations (Eco-Management and Audit Scheme)	Regulation (EC) no. 1221/2009 of the European Parliament and of the Council of 25 November 2009	On the voluntary participation of organizations in a Community Eco-Management and Audit Scheme (EMAS) and repealing Regulation (EC) no. 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC.	Regulation (EU) 2017/1505 Regulation (EU) 2018/2026
Air pollution	Presidential Decree 1180/81 (Gazette No 293 A)	«About regulation of issues related to the foundation and operation of industries, manufactures, all nature of mechanical installations and storages for the insurance of the environment».	MD 69269/5387/1990, (GG 678/B/25.10.1990) L. 1650/1986, (GG 160/A/16.10.1986)
	Ministerial Decree 11294/93 (Gazette No 264/B)	Terms of operation and approved limits of gas waste emissions from the industrial boilers.	
	M.D. 10245/713/1997	Measures and conditions for the control of volatile organic compounds emissions (VOCs) arising from the petrol storage and its disposal from the terminal installations to the fuel distribution stations	

Subject	National and European Legislation	Description	Amendments
Air pollution	MD 22306/1075/E103/2007 (Gazette No 920B/07)	Establishment of Objectives and limits assessment of concentrations of arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air, in compliance with the provisions of Directive 2004/107/EC about "Relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air "of the Council of 15 December 2004".	MD 174505/607/2017, (GG 1311/B` 13.4.2017) MD. 14122/549/E.103/2011, (GG 488/B/30.3.2011)
	Ministerial Decree 37411/1829/E103 (Gazette No B 1827/11 September 2007)	«Determination of the appropriate values, meters and procedures for the application of the Regulation 2037/2000 of the European Parliament and of the Council of 29 June 2000 «on substances that deplete the ozone layer».	
	MD 10735/651/2012 (Gazette No 2656/B/28.9.12)	Installation, Operation and Control of Steam Boilers.	MD 136860/1673/Φ15/2018, (GG 6210/B/31.12.2018)

Subject	National and European Legislation	Description	Amendments
Air pollution	JMD 36060/115/E.103 (Gazette 1450/V/14.6.2013)	Definition guidelines, measures and procedures for the prevention and control of pollution from industrial activities, in conformity with the provisions of Directive 2010/75/EE ''about industrial emissions (integrated pollution prevention and control)" of the European Parliament and of the Council of 24 November 2010.	MD. ΥΠΕΝ/ΔΔΕΔ/46424/1134/2021 (GG 2185/B` 26.5.2021) MD ΥΠΕΝ/ΥΠΡΓ/56257/7231/2019, (GG 2646/B/1.7.2019) MD. ΥΠΕΝ/ΥΠΡΓ/82568/11912/2018, (GG 5301/B/26.11.2018) MD 181627/1185/2016 (GG 2494/B` 12.8.2016) L. 4342/2015, (GG 143/A/9.11.2015) MD. 34062/957/E103/2015, (GG 1793/B/20.8.2015) MD. 44105/1398/E.103/2013, (GG 1890/B/1.8.2013)
	Directive 92/42/EEC Of the Council at 21.05.1992	On efficiency requirements for new hot-water boilers fired with liquid or gaseous fuels.	
	Directive 2010/75/EU and Executive Committee's decision of 09.10.2014	About determination of the conclusions on best available techniques under Directive 2010/75 / EU of the European Parliament and the Council on the oil and gas refining	

Subject	National and European Legislation	Description	Amendments
Climate change	M.D 11535/1993	Permitted types of fuel in the industrial and related installations, in the hospital incinerators and measures for the open combustion hotspots	
	M.D 11294/1993	Operating conditions and permissible emission limits of air emissions from industrial boilers, steam generators, oil heaters and air heaters operating with fuel oil, diesel, or gas fuel.	
	Law 3054/2002	Organization of the oil market and other provisions	L. 5037/2023 (ΦΕΚ 58/Α` 28.3.2023) L. 4796/2021 (ΦΕΚ 63/Α` 17.4.2021) L. 4685/2020 (ΦΕΚ 92/Α` 7.5.2020) L. 4546/2018, (GG 101/A/12.6.2018) L. 4447/2016, (GG 241/A/23.12.2016) L. 4409/2016, (GG 136/A/28.7.2016) L. 4361/2016 (GG 10/A/1.2.2016) L. 4254/2014, (GG 85/A/7.4.2014) L. 4233/2014, (GG 22/A/29.1.2014) L. 4093/2012, (GG 222/A/12.11.2012) L. 4072/2012, (GG 86/A/11.4.2012) L. 3897/2010, (GG 208/A/10.12.2010) L. 3335/2005, (GG 95/A/20.4.2005)

Subject	National and European Legislation	Description	Amendments
Climate change	JMD 284/2006/2007 (Gazette 1736B)	Harmonization of the Greek legislation with the Directive 1999/32/EC on the reduction of the content of sulfur in certain fuels and about the amendment of the Directive 93/12 / EEC and the Directive 2005/33 / EC of the European Parliament and of the Council amending Directive 1999/32 / EC about the sulfur content of marine fuels.	
	Law 4062/2012	Exploitation of former Greek Airport - SUN Project - Promoting the use of energy from renewable sources (Integration Directive 2009/28/EC) - Sustainability Criteria for Biofuels and bioliquids (Incorporation Directive 2009/30/EC)	
	JMD 175700/2016	Biofuel sustainability system and bioliquids.	

Subject	National and European Legislation	Description	Amendments
Climate change	M.D. Ministry of energy / ΔΚΑΠΑ / 105040/2297	Amendment of the joint ministerial decision 181478/965/2017 (Β΄3763), as in force, in compliance with the Directive (EU) 2018/410 “on the amendment of the directive 2003/87 / EC with a view to enhancing cost-effective emissions reductions and promoting low-carbon investments and Decision (EU) 2015/1814 ”of the European Parliament and of the Council of 14 March 2018.	JMD 181478/965/2017 (GG Β΄3763)
	Law No. 4936/2022 (O.G.G 105/A` 27.5.2022)	National Climate Law - Transition to climate neutrality and adaptation to climate change, emergency provisions to address the energy crisis and protect the environment.	
	JMD YPEN/D HE/35549/731/06.04.2023	Support for businesses in sectors and sub-sectors exposed to significant carbon leakage risk due to the cost of emissions trading system allowances of the EU, which is passed on to electricity prices (support for indirect emissions costs), in accordance with the provisions of Directive 2003/87/EC as amended in force, as well as Commission Communication 2020/C 317/04/25.09.2020 (Guidelines on certain State aid measures within the	

Subject	National and European Legislation	Description	Amendments
		framework of the ghg emissions trading system after 2021). Procedure for granting the support by the D.A.P.E.E.P S.A, for the period 2021-2030, beneficiaries, maximum amount of support, and methodology for granting the support.	
Climate change	Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009	On the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC	
	Regulation (EU) 1005/2009	On substances that destroy the ozone layer	
	Regulation (EU) 517/2014 of the European Parliament and of the Council of 16 April 2014	On fluorinated greenhouse gases and repealing Regulation (EC) No 842/2006	
	IMPLEMENTING DECISION 2014/738 / EU	Definition of the conclusions on best available techniques (BAT), based on Directive 2010/75 / EU of the European Parliament and of the Council about oil and gas refining	

Subject	National and European Legislation	Description	Amendments
Climate change	Directive (EU) 2015/1513 of the European Parliament and of the Council of 9 September 2015	Amending Directive 98/70/EC relating to the quality of petrol and diesel fuels and amending Directive 2009/28/EC on the promotion of the use of energy from renewable sources	
	IMPLEMENTING DECISION (EU) 2018/1135.	Definition of the type, format, and frequency of information to be made available by Member States for reporting on the implementation of Directive 2010/75 / EU of the European Parliament and of the Council on Industrial air Emissions	
	Directive (EU) 2018/410 of the European Parliament and of the Council of 14 March 2018	Amending Directive 2003/87 / EC targeting to enhancing cost-effective emissions reductions and promoting low-carbon investments and the Decision (EU) 2015/1814.	
	Implementing Regulation (EU) 2018/2066	About the monitoring and reporting of greenhouse gas emissions in accordance to Directive 2003/87 / EC of the European Parliament and of the Council amending Regulation (EC) No 601/2012.	

Subject	National and European Legislation	Description	Amendments
Climate change	Commission Regulation (EU) 2019/331	laying down Union transitional rules for the harmonized allocation of allowances in accordance with Article 10a of Directive 2003/87 / EC of the European Parliament and of the Council.	
	Commission Regulation (EU) 2019/1842	laying down rules for the implementation of Directive 2003/87 / EC of the European Parliament and of the Council as regards further arrangements for adjusting the free allocation of allowances due to changes in activity level.	
	Commission Regulation (EU) 2020/2085	Amending and correcting Implementing Regulation (EU) 2018/2066 on monitoring and reporting on greenhouse gas emissions pursuant to Directive 2003/87 / EC of the European Parliament and of the Council European Parliament and of the Council.	
	IMPLEMENTING REGULATION (EU) 2021/447 of 12 March 2021	Determining revised benchmark values for free allocation of emission allowances for the period from 2021 to 2025 pursuant to Article 10a(2) of Directive 2003/87/EC of the European Parliament and of the Council	

Subject	National and European Legislation	Description	Amendments
Climate change	DIRECTIVE (EU) 2023/959 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 10 May 2023	Amending Directive 2003/87/EC establishing a system for greenhouse gas emission allowance trading within the Union and Decision (EU) 2015/1814 concerning the establishment and operation of a market stability reserve for the Union greenhouse gas emission trading system.	
	IMPLEMENTING REGULATION (EU) 2023/2122 of 17 October 2023	Amending Implementing Regulation (EU) 2018/2066 as regards updating the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council.	
	DELEGATED REGULATION (EU) 2023/2772 of 31 July 2023	Supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards	

Subject	National and European Legislation	Description	Amendments
Sustainable development	DIRECTIVE 2013/34/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 26 June 2013	On the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC	Directive 2014/95/EU Directive 2014/102/EU του Συμβουλίου Directive (EU) 2021/ Directive (EU) 2022/2464
	DIRECTIVE 2014/95/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 22 October 2014	Amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups	
	DIRECTIVE (EU) 2022/2464 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 December 2022	Amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting	Regulation (EU) 537/2014 Directive 2004/109/EC Directive 2006/43/EC Directive 2013/34/EU
Hazardous waste	Ministerial Decree 13588/725/2006 (Gazette No 383/B/28.03.2006)	«Measures, terms and restrictions for handling hazardous wastes according to the Directive 91/689/EEC for hazardous waste» Replacement of the Ministerial Decree 19396/1546/1997	MD. 62952/5384/2016, (GG 4326/B/30.12.2016) L. 4042/2012, (GG 24/A/13.2.2012)

Subject	National and European Legislation	Description	Amendments
			MD. 146163/2012, (GG 1537/B/8.5.2012) MD. 8668/2007, (GG 187/B/2.3.2007)
Hazardous waste	Ministerial Decree 24944/1159 (791 B / 2006)	Approval of the General Technique Specifications for handling the hazardous wastes according to the article 5 (paragraph B) of the 13588/725 common ministerial decision «Measures, terms and restrictions for handling the hazardous wastes etc» (B' 383) and in conformity with the provisions of the article 7 (paragraph 1) of the Directive 91/156/EEC of the 18 March 1991 Council».	MD. 62952/5384/2016, (GG 4326/B/30.12.2016) MD. 146163/2012, (GG 1537/B/8.5.2012) MD. 8668/2007, (GG 187/B/2.3.2007)
	MD 52167/4683/2012 (Gazette No 37/B'/20.01.2012)	Adaptation of Greek legislation to the provisions of Directive 61/2010/EE of 2nd September 2010 adapting to scientific and technical progress of the Annexes of Directive 2008/68/EC of the European Parliament and of the Council about the internal transport of hazardous goods.	MD Γ1/20655/2897/2015, (GG 1495/B/16.7.2015)

Subject	National and European Legislation	Description	Amendments
Hazardous waste	MD 39200/15 (GG-2057 B / 18.09.15)	Amendments No. 41624/2057/2010 JMD (B1625), in compliance with the provisions of Directive 2013/56 / EU "for amending Directive 2006/66 / EC of the European Parliament and of the Council on batteries and accumulators as regards the placing on the market of portable batteries and accumulators containing cadmium	
	MD 43942/4026/2016 (19.09.2016)	Organization and operation of the electronic waste register in accordance with the provisions of Article 42 of Law 4042/2012(A'24)	MD. 26303/1483/2017, (GG 2037/B/13.6.2017) MD. 1/1/2017, (GG 1/B/4.1.2017)
	MD 181504/2016 (Government Gazette 2454 / B '/ 9.10.2016)	Training, content and management system of the National Producer Register - Establishment of procedure for the registration of producers under the alternative management of packaging and other products, in accordance with Articles 7 and 17 of Law 2939/2001 (A 179) as applicable	MD 175216/2018, (GG 1892/B/24.5.2018) MD. 892/2017, (GG 538/B/22.2.2017)

Subject	National and European Legislation	Description	Amendments
Hazardous waste	M.D. YPEN/DNEP/31068/1952/2018, (GG 2783/B/12.7.2018)	«Amendment of Annex II of Article 18 of Presidential Decree 116/2004 (A' 81), as in force, in compliance with the provisions of Commission Directive (EU) 2017/2096 of 15 November 2017 'amending Annex II to Directive 2000/53/EC of the European Parliament and of the Council on end-of-life vehicles».	MD. ΥΠΕΝ/ΔΔ Α/41531/626/2023 (GG 2654/Β` 21.4.2023)
	Regulation (EU) No 1357/2014 of 18 December 2014	Replacing Annex III to Directive 2008/98/EC of the European Parliament and of the Council on waste and repealing certain Directives	
General Waste	Ministerial Decree 114218/97 (Gazette No B 1016)	«Creation of a frame with the specifications and general programs for managing the solid waste».	MD. 56366/4351/2014, (GG 3339/B/12.12.2014)
	L. 3854/2010 (Gazette No 94/A/10)	Amendment of legislation for alternative management of packaging and other products, and the National Organization of Alternative Packaging Management and Other Products and other provisions.	L. 4530/2018, (GG 58/A/30.3.2018) L. 4315/2014, (GG 269/A/29.12.2014) L. 4071/2012, (GG 85/A/11.4.2012) L. 4042/2012, (GG 24/A/13.2.2012)

Subject	National and European Legislation	Description	Amendments
General Waste	JMD 36259/1757/E103 (O.G.G 1312/24.08.10)	Measures, conditions and program for the alternative management of waste from excavations, constructions and demolitions (AEKK)	L. 4030/2011, (GG 249/A/25.11.2011) MD. Δ17α/50/2/ΦΝ 444.1/27.3.2013 MD. 4834/25.1.2013
	Explanatory Circular 24040/2590/2013	Implement legislation on cross-border transportation of non - hazardous waste.	
	L. 4496/2017 (GG 170/A`/8.11.2017)	Amendment of Law 2939/2001 on alternative management of packaging and other products, adaptation to Directive 2015/720/EU, regulation of issues of Hellenic Recycling Organization and other provisions	L. 4843/2021 (GG 193/A' 20.10.2021)
	M.D. Act 39 of 31.8.2020	Approval of the National Waste Management Plan (ESDA).	
	Joint Ministerial Decision 3122.3-15/71164/2021 (O.G.G. 4790/B/18.10.2021)	Amendment of the Greek legislation to the Directive (EU) 2019/883 of the European Parliament and of the Council of 17 April 2019 on port reception facilities for the delivery of waste from ships, amending Directive 2010/65/EU and repealing Directive 2000/59/EC	

Subject	National and European Legislation	Description	Amendments
General Waste	Directive 94/62/EC of 20.12.1994	Packaging and packaging waste.	
	REGULATION (EC) No 1013/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 June 2006	Waste transportation.	
	Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008	Waste and repealing certain Directives	
	Decision 2014/955 / EC of 18.12.2014 amending Decision 2000/532 / EC	List of wastes	
	REGULATION (EU) no. 2022/92 of 21 January 2022	Establishing rules for the implementation of Directive (EU) 2019/883 of the European Parliament and of the Council regarding the methods of monitoring data and the format for the submission of passively fished waste.	

Subject	National and European Legislation	Description	Amendments
Electrical and Electronic equipment	Presidential Decree 117 of 5.04.2004	«Measurements, terms and programs for alternative management of the waste which result from the electric and electronic equipment», in conformity with the provisions of the Directive 2002/95 «on the restriction of the use of certain hazardous substances in electrical and electronic equipment».	MD. 23615/651/E.103/2014, (GG 1184/B/9.5.2014) P.D.. 114/2013, (GG 147/A/17.6.2013) MD. 133480/2011, (GG 2711/B/15.11.2011) P.D. 15/2006, (GG 12/A/3.2.2006)
	M.D. YPEN / DNEP / 36928/2227/2018 (Government Gazette 5459 / B '/ 6.12.2018)	Amendment of the Joint Ministerial Decision Η.Π. 23615/651 / Ε.103 / 8-5-2014 on "Establishment of rules, terms and conditions for the alternative management of waste electrical and electronic equipment (WEEE) in compliance with the provisions of the Directive 2012/19 / EC (WEEE)" of the European Parliament and of the Council of 4 July 2012 and other provisions' (B 1184)	
	M.D. YPEN/DDA/81490/1650/2021 (GG 4382/B` 22.9.2021)	Integration of Directive (EU) 2018/849 of the European Parliament and of the Council of 30 May 2018 amending Directives 2000/53/EC on end-of-life	

Subject	National and European Legislation	Description	Amendments
		vehicles, 2006/66/EC on batteries and accumulators and waste batteries and accumulators, and 2012/19/EU on waste electrical and electronic equipment (L 150) in so far as it concerns the amendment of Directive 2012/19/EU on waste electrical and electronic equipment - amendment of Directive H. P. 23615/651/E.103 /2014 (B' 1184) Joint Decision of the Ministers of Development and Competitiveness and Environment, Energy and Climate Change' Determination of terms, and conditions for the alternative management of waste electrical and electronic equipment (WEEE), in compliance with the provisions of Directive 2012/19/EC "on waste electrical and electronic equipment (WEEE)" of the European Parliament and of the Council of 4 July 2012 and other provisions". (B' 1184)	

Subject	National and European Legislation	Description	Amendments
Lead Batteries and Accumulators	Presidential Decree 115/2004 (Gazette No 80A / 2004)	«Replacement of Ministerial Decree 73537/1438/95 “For the electrical columns and accumulators which consist certain hazardous substances” (B781) and 19817/2000 Ministerial Decree «Modification of 73537/1438/95 Ministerial Decree etc» (B’ 963) Measurements, terms and program for alternative management of electrical columns and accumulators».	
	Ministerial Decree 41624/2057/E103(Gazette No 1625 B/2010)	Measurements, terms and program for alternative management of the waste, electrical columns and accumulators in conformity with the provision of the Directives, 2006/66/EC and 2008/103/EC of the European Parliament and Council.	MD. ΥΠΕΝ/ΔΔΑ/81492/1651/2021 (GG 4382/B` 22.9.2021) MD. 39200/2015, (GG 2057/B/18.9.2015)
	Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023	Concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC (Text with EEA relevance)	

Subject	National and European Legislation	Description	Amendments
Tyres	Directive 94/62/EC of 20.12.1994	Packaging and packaging waste.	
	MD YPEN/DDA/36464/547/2023 (G.G 2217/B` 6.4.2023)	Extended Producer Responsibility Program for vehicle tires in accordance with paragraph 4 of Article 72 of Law 4819/2021.	
Noise	Presidential Decree 1180/81 (Gazette No 293 A)	«About regulation of issues related to the foundation and operation of industries, manufactures, all nature of mechanical installations and storages for the insurance of the environment».	MD 69269/5387/1990, (GG 678/B/25.10.1990) L. 1650/1986, (GG 160/A/16.10.1986)
	Ministerial Decree 37393/2028/2003 (Gazette No 1418B)	Measurements and terms for the noise emission in the environment by equipment for use outdoors.	MD. Η.Π. 9272/471/2007, (GG 286/B/2.3.2007)
	Ministerial Decree 13586/724/2006 (Gazette No 384B)	«Determination of measurements, terms and methods for assessment of the management of noise in the environment, in conformity with the provision of the Directive 2002/49/EC «related to the assessment and management of environmental noise» of the Council of 25.06.2002.	MD. ΥΠΕΝ/ΔΚΑΠΑ/13757/255/2022 (GG 710/B` 16.2.2022) MD. ΥΠΕΝ/ΔΝΕΠ/27136/1793/2018, (GG 6108/B/31.12.2018)

Subject	National and European Legislation	Description	Amendments
Noise	Directive 2000/14/EC	On the approximation of the laws of the Member States relating to the noise emission in the environment by equipment for use outdoors.	
	Directive 2002/49/EC of the European Parliament and of the Council of 25 June 2002	Relating to the assessment and management of environmental noise.	
Chemical Substances	MD 388/2001/2002 (Gazette No 170/B/02)	Harmonization of national legislation with the regulation 2000/21/E.K, 2000/32/EC, 2000/33/EC of Commission of the European Communities.	
	MD 52167/4683/2012 (Gazette No 37/B/12)	Adaptation of Greek legislation to the provisions of Directive 61/2010/EE of 2 September 2010 adapting to scientific and technical progress of the Annexes of Directive 2008/68/EC of the European Parliament and of the Council on the internal transport of hazardous goods.	MD. Γ1/20655/2897/2015, (GG 1495/B/16.7.2015)

Subject	National and European Legislation	Description	Amendments
Chemical Substances	PD 52/2015 (17.07.2015)	Harmonization with Directive 2014/27 / EU For the Amendment of the Council Directives 1992/58 / EEC, 1992/85 / EEC, 1994/33 / EC, 1998/24 / EC and Directive 2004/37 / EC of the European Parliament and of the Council in order to be aligned with the Regulation (EC) No 1272/2008 on classification, labeling and packaging of substances and mixtures - Amendment of Presidential Decrees 105/1995, 176/1997, 62/1998, 338/2001 and 399/1994	MD. 34829/962/30.7.2015
	JMD No. 111/2017	Amendment - Supplement to No. 3015811/2663 (Government Gazette 1410 / BD / 6.9.2010) joint ministerial decision about control measures and sanctions for the implementation of Regulation No. 1272/2008/EC of the European Parliament and of the Council and Repeal of Ministerial Decision 265/2002, (Government Gazette 1214 / BD / 19.9.2002) on the classification, labeling and packaging of hazardous substances and Joint Ministerial Decision No. 378/1994 (Government Gazette 705 / BD / 20.9 .1994) on the classification, labeling, packaging and dangerous substances.	

Subject	National and European Legislation	Description	Amendments
	COMMISSION REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006	Concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), establishing a European Chemicals Agency and the amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Regulation (EC) No 1488/94 and Council Directive 76/769/EEC and Directives Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC, as amended and in force.	Regulation (EU) 2015/830 Regulation (EU) 2018/588 Regulation (EU) 2020/878 Regulation (EU) 2020/1435
Chemical Substances	COMMISSION REGULATION (EC) No 1272/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 December 2008	Classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006, as amended and is in force.	Regulation (Eu) 2020/1677

Subject	National and European Legislation	Description	Amendments
Solid Waste	M.D. 54461/1779 / E.103 / 2013 (Government Gazette 2500 / B / 4.10.2013)	"Replacement of Annex I of article 4 of the joint ministerial decision no. 9268/469/2007 (286 / B), in accordance with provisions of Directive 2013/2 / EU "amending Annex I to Directive 94/62 / EC of the European Parliament and of the Council on packaging and packaging waste" of the European Commission of 7 February 2013.	
	Law 4819/2021 (O.G.G. 129/A/23.07.2021)	Integrated framework for waste management - Transposition of the Directive 2018/851 and 2018/852 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste and Directive 94/62/EC of 20 December 1994 on packaging and packaging waste, organization framework of the Hellenic Recycling Agency, provisions for plastic products and the natural environment protection, urban planning – city planning, energy and pertinent exigent provisions	MD. ΥΥΠΕΝ/ Δ ΜΕΑΑΠ/ 125261 /1546/2023 (GG 7210/B` 21.12.2023) L. 5069/2023 (GG 193/A` 28.11.2023) L. 5037/2023 (GG 58/A` 28.3.2023) L. 4964/2022 (GG 150/A` 30.7.2022) L. 4936/2022 (GG 105/A` 27.5.2022) L. 4843/2021 (GG 193/A' 20.10.2021)
	Circular YPEN/DDA/34045/501 /29.03.2023	Environmental Management Systems in production and waste management facilities - obligations of waste producers	

Subject	National and European Legislation	Description	Amendments
Solid Waste	Cabinet Act 5 of 18.4.2023	Approval of amendments to the National Waste Management Plan (ESDA)- Amendment of no. 39/31.8.2020 Act of the Council of Ministers (A' 185)	
Energy	Law 3054/2002 (O.G.G. 230/A/02.10.2002)	«Organization of the petroleum market and other provisions»	L. 5037/2023 (GG 58/A` 28.3.2023) L. 4796/2021 (GG 63/A` 17.4.2021) L. 4685/2020 (GG 92/A` 7.5.2020) L. 4546/2018, (GG 101/A/12.6.2018) L. 4447/2016, (GG 241/A/23.12.2016) L. 4409/2016, (GG 136/A/28.7.2016) L. 4361/2016 (GG 10/A/1.2.2016) L. 4254/2014, (GG 85/A/7.4.2014) L. 4233/2014, (GG 22/A/29.1.2014) L. 4093/2012, (GG 222/A/12.11.2012) L. 4072/2012, (GG 86/A/11.4.2012) L. 3897/2010, (GG 208/A/10.12.2010) L. 3769/2009, (GG 105/A/1.7.2009) L. 3335/2005, (GG 95/A/20.4.2005)

Subject	National and European Legislation	Description	Amendments
Energy	Law 3468/2006	Production of Electricity from Renewable Energy Sources and Cogeneration of Heat and Power High Performance and other provisions	
	Law 3661/2008 (Gazette No 89A / 2008)	Measurements for the reduction of the energy consumption into the buildings and other provisions.	L.4122/2013 - GG 42/A/19-2-2013 L.4111/2013 - GG 18/A/25-1-2013 L.4030/2011 - GG 249/A/25-11-2011 L.3851/2010 - GG 85/A/4-6-2010
	Law 3855/10 (Gazette No 95 A / 23.06.2010)	Measurements for the improvement of the energy efficiency during the final use, energy services and other provisions.	
	Ministerial Decree D6/B/5825 (Gazette No 407/09-09-2010)	Regulation of Energy Efficiency of Buildings.	MD. ΔΕΠΕΑ/οικ.178581/2017, (GG 2367/B/12.7.2017) L. 4342/2015, (GG 143/A/9.11.2015)

Subject	National and European Legislation	Description	Amendments
	Joint Ministerial Decision 44105/1398/E.103/2013 (O.G.G. 1890/B/01.08.2013)	«Amendment of the No. 29459/1510/2005 Joint Ministerial Decision «Defining National emission ceilings for certain atmospheric pollutants…» (992/B) and (1131/B), as amended by the No.14849/853/2008 Joint Ministerial Decision (645/B) and the No.33318/3028/1998 Joint Ministerial Decision «Defining measures and procedures for the conservation of natural habitats μέτρων as well as wild fauna and flora» (Β΄1289), as amended by the No.14849/853/2008 Joint Ministerial Decision (645/B), in compliancy with the provisions of the Directive 2013/17/EU of the Council of 13 May 2013 of the European Union and other provisions»	
Energy	Joint Ministerial Decision 34062/957/E103/2015 (O.G.G. 1793/B/20.8.2015)	«Approval of the Transitional National plan on Emissions Reduction, according to Article 28 of the No. 36060/1155/2013 Joint Ministerial Decision (1450/B) «Defining a framework of regulations, measures and procedures for the integrated prevention and control of environmental pollution from industry emissions, in compliance with the provisions of the Directive 2010/75/EU « on industrial emissions (integrated pollution	

Subject	National and European Legislation	Description	Amendments
		prevention and control)» of the European Parliament and the Council 24 November 2010», as applicable.	
Energy	Law 4342	Pension arrangements and incorporation into Greek law of Directive 2012/27 / EU of the European Parliament and of the Council of 25 October 2012 'about energy efficiency, amendments of Directives 2009/125 / EC and 2010/30 / EU and abolishment of Directives 2004/8 / EC and 2006/32 / EC.	L. 4843/2021 (GG 193/A' 20.10.2021) L. 4808/2021 (GG 101/A` 19.6.2021) L. 4685/2020 (GG 92/A` 7.5.2020) L. 4610/2019, (GG 70/A/7.5.2019) L. 4495/2017, (GG 167/A/3.11.2017) L. 4447/2016, (GG 241/A/23.12.2016) L. 4425/2016, (GG 185/A/30.9.2016) L. 4409/2016, (GG 136/A/28.7.2016) L. 4403/2016, (GG 125/A/7.7.2016)
	JMD 178679/2017 (GG 2337 / 10.07.2017)	Qualification and Certification Systems for Energy Auditors. Register of Energy Auditors and Energy Audit Archive	
	M.D. 175275/2018 (Government Gazette 1927 / B '/ 30.5.2018)	Qualification and Certification Systems for Energy Auditors. Energy Auditors Register and Energy Audit Archive	ΜΔ. ΥΠΕΝ/ΔΕΠΕΑ/97536/326/2018, (ΦΕΚ 6136/Β/31.12.2018)
	Ministerial Decision, Directorate of Energy Policies and Energy Efficiency/Our Ref. 170472/2018 (O.G.G. 181/B/26.1.2018)	Amendment of Directorate of Energy Policies and Energy Efficiency/Our Ref. 178581/30.06.2017 Joint Ministerial	

Subject	National and European Legislation	Description	Amendments
		Decision «Approval of Energy Performance in Buildings Regulation»	
Energy	Law 4643/2019 (O.G.G. 193/A/3.12.2019)	«Liberalization of the energy market, modernization of. PPC, privatization of DEPA and support of R.E.S. and other provisions.»	L. 4819/2021 (GG 129/A` 23.7.2021) L. 4759/2020 (GG 245/A` 9.12.2020)
	Ministerial Decision, Ministry of the Environment and Energy/Mnstr/56257/7231/2019 (O.G.G. 2646/B/01.07.2019)	«Amendment of the No. 36060/1155/E.103/13.6.2013 decision of Development, Competitiveness, Infrastructure, Transport and Networks Minister and Environment, Energy and Climate Change Minister - «Defining a framework of regulations, measures and procedures for the integrated prevention and control ofenvironmental pollution from industry emissions, in compliance with the provisions of the Directive 2010/75/EU « on industrial emissions (integrated pollution prevention and control)» of the European Parliament and the Council 24 November 2010», as applicable	ΜΔ. ΥΠΕΝ/ΔΔΕΔ/46424/1134/2021 (ΦΕΚ 2185/Β` 26.5.2021)

Subject	National and European Legislation	Description	Amendments
Energy	Ministerial Decision 4/2019 (O.G.G. 4893/B/31.12.2019)	«National Energy and Climate Plan (NECP)»	
	Law 4843/2021 (O.G.G. 193/A/20.10.2021)	Transposition of the Directive (EU) 2018/2002 of the European Parliament and of the Council of 11 December 2019 amending Directive 2012/27/EC on energy efficiency, amendment to the Regulation 2019/1999/EU of the European Parliament and of the Council of 11 December 2019 on the on the governance of the energy union and climate action and Commission Delegated Regulation (EU) 2019/826 of 4 March 2019 amending Annexes VIII and IX to Directive 2012/27/EU of the European Parliament and of the Council on the contents of comprehensive assessments of the potential for efficient heating and cooling, pertinent regulations on energy efficiency in the building sector, as well as on strengthening renewable energy sources and competition in the electricity market network, and other exigent provisions	L. 4964/2022 (GG 150/A` 30.7.2022)

Subject	National and European Legislation	Description	Amendments
	MD YPEN/DEPEA/51153/387/2023 (G.G 3187/B/15-5-2023)	Qualification and Certification Systems for Energy Auditors. Register of Energy Auditors and Energy Audits Archive.	
Energy	Directive 2002/91/EC of the European Parliament and of the Council of 16 December 2002	On the energy performance of buildings.	
Treatment of waste- Protection of the water sources	Prefecture Decision 17823/79 (Gazette No 1132/B/79)		
	Prefecture Decision A3/6533/81 (Gazette No 477/B/81)		
	Law 1739/87 (Gazette No 201 A / 20.11.87)	Management of water sources and other provisions.	
	Law 3199/2003 (Gazette No 280 A / 09-12-2003)	Protection and management of water – conformity with Directive 2000/60/EC.	L. 5106/2024 (GG 63/A` 1.5.2024) L. 5037/2023 (GG 58/A` 28.3.2023) L. 4519/2018, (GG 25/A/20.2.2018) L. 4315/2014, (GG 269/A/29.12.2014) L. 3621/2007 (GG 279/A/20.12.2007) L. 3481/2006, (GG 162/A/2.8.2006)

Subject	National and European Legislation	Description	Amendments
	Ministerial Decree D. YG2 / G.P. 133551/2008 (Gazette No 2089/ B'/ 09.10.2008)	Modification of case (γ) of paragraph 1, article 8, E1b/221/65 Sanitary provision.	
Treatment of waste- Protection of the water sources	Law 4042/2012 (Gazette 24/A/13.02.2012)	Criminal law environmental protection – Harmonization with the directive 2008/99/EEC – Framework for the production and management of waste- Regulation of provisions of Environmental Ministry.	L. 4819/2021 (GG 129/A` 23.7.2021) L. 4685/2020 (GG 92/A` 7.5.2020) L. 4495/2017, (GG 167/A/3.11.2017) MD. 181627/1185/2016, (GG 2494/B/12.8.2016) L. 4409/2016, (GG 136/A/28.7.2016) L. 4447/2016, (GG 241/A/23.12.2016) L. 4280/2014, (GG 159/B/8.8.2014) L. 4277/2014, (GG 156/A/1.8.2014)
	MD 191002/2013 (Gazette 2220/B/09.09.2013)	Amendment of JMD 145116/2011 "Specifying measures, conditions and procedures for the reuse of treated wastewater (354/B) and related provisions''.	

Subject	National and European Legislation	Description	Amendments
Fire Protection	Presidential Decree 71/1988 (Gazette No 32A/17-2-1988)	Regulation of fire protections of buildings.	PD. 41/2018. (GG 80/A/7.5.2018) MD. 31856/2003, (GG 1257/B/3.9.2003) MD. 33940/7590/1998, (GG 1316/B/31.12.1998) MD. 5905/Φ15/839/1995, (GG 611/B/12.7.1995) MD. 54229/2498/1994, (GG 312/B/22.4.1994) MD. 81813/5428/1993, (GG 647/B/30.8.1993) MD. 58185/2474/1991, (GG 360/B/28.5.1991) PD. 374/1988, (GG 168/A/12.8.1988)
	MD 34458/1990 (Gazette No 846/B/90)	Establishment of technical specifications, configuration, design, construction, safe operation of refineries and other oil industries.	
	Ministerial Decree 50292/3549/08/2009 (Gazette No 272/B'/16-2-2009)	Supply the vehicles with portable fire extinguisher.	

Subject	National and European Legislation	Description	Amendments
Fire Protection	Fire Department provision 13α/2010	Modification of the 13/2008 Fire Department provision about «determination of the procedure for giving certificate of fire protection in enterprises which are in buildings.	
	Decision 12/2012 (Gazette No 1794/B/98)	Introduction of the maintenance book for control and proper operation of the means of active fire protection of facilities.	Fire Department provision 13/2013
	No. 15/2014 Fire-fighting Provision	"Specifications of studying, designing and installing portable, permanent and other preventive and repressive measures and ways of the existing fire protection legislation.	MD. 24738 Φ.701.2/2017, (GG 2089/B/19.6.2017)
	MD /2014 (Government Gazette 2434/B/09.12.2014)	Organize, training and staff informing on fire protection issues	MD. 24738 Φ.701.2/2017, (ΦΕΚ 2089/B/19.6.2017)
	M.D 3275 F.700.17/2016 (GG 388/B' /19.2.2016)	Fire Fighting Provision 17/2016 - Measures and ways of Fire Protection of offices	
	MD 29321 F.700.19/2022 (O.G.G 2833/B` 7.6.2022)	Amendment of decision no. 23083 Φ.700.19/11.6.2020 by the Deputy Ministers of Finance and Citizen Protection regarding the approval of Fire Order no. 19/2020 on the "Procedure for imposing administrative fines for violations of regulatory provisions on fire protection legislation" (B' 2233).	
	MD YPEN/DAOKA/55904/2019/2023 (G.G 3475/B` 24.5.2023)	Fire Protection Regulation for Properties within or near Forested Areas	MD. ΥΠΕΝ/ΔΑΟΚΑ/38701/1172/2024 (GG 2194/B` 10.4.2024)

Subject	National and European Legislation	Description	Amendments
Environmental Responsibility	Presidential Provision 148 (Gazette No 190/29-09-2009)	Environmental Responsibility for prevention and repairing the damages to the environment – Conformity with the Directive 2004/35/EC of the European Parliament and of the Council of 21 April 2004.	L. 4409/2016, (GG 136/A/28.7.2016) MD. Η.Π. 48416/2037/Ε.103/2011, (GG 2516/B/7.11.2011)
Usage of Water	Joint Ministerial Decision 51354/2641/E103 (O.G.G. 1909/B/08.12.2010)	Defining Environmental Quality Standards for the concentration of certain pollutants and priority substances in surface waters, in compliance with the provisions of the Directive 2008/105/EU of the European Parliament and the Council of 16 December 2008 «on environmental quality standards in the field of water policy, amending and subsequently repealing Council Directives 82/176/EEC, 83/513/EEC, 84/156/EEC, 84/491/EEC and 86/280/EEC amending Directive 2000/60/EC of the European Parliament and of the Council», as well as the concentrations of specific pollutants in inland surface waters and other provisions.	MD. οικ. 170766/2016, (GG 69/B/22.1.2016)
	MD 182314/1241/2016 (Government Gazette 2888 / B '/ 12.9.2016)	Amendment of Annex II of Article 8 of No 39626/2208/2009 Joint Ministerial decision (B'2075), in compliance with the	

Subject	National and European Legislation	Description	Amendments
		provisions of Directive 2014/80 / EU “amending Annex II of Directive 2006/118 / EC of the European Parliament and of the Council on the protection of groundwater against pollution and Degradation " of the European Commission on 20 June 2014	

ANNEX II – REFINERY VEHICLES

Category: Owned Vehicles

Brand	Model	Vehicle category	Type of fuel	taxation horsepower	CO_2	Engine displacement
TEMARED	Trailer	Construction machinery (CM)				
HYUNDAI	30D-9V	CM	Diesel	65		
CATERPILLAR	950E	CM	Diesel	167		
CASE	321B	CM	Diesel	73		
MERCEDES	930.03	Truck for Private Use (TPU)	Diesel	72		11946
HYUNDAI	30D-9V KLARK	CM	Diesel	65		
MITSUBISHI		TPU	Diesel	17		
MERCEDES	S300	Private Vehicle (PV)	Diesel	15	110	2143
BMW	650GS	PV	Petrol	8		652
HYUNDAI	KONA	PV	Petrol	11		1598
CATERPILLAR	950H	CM	Diesel	199		
CATERPILLAR	272C	CM	Diesel	91		
CATERPILLAR	950GII	CM	Diesel	183		
LINDE	H40D	CM	Diesel	71		
MAN	L2007.46.001	CM	Diesel	430		
DAF	FAV2300	CM	Diesel	190		
MAN		CM	Diesel	430		
SUZUKI	DL 650	PV	Petrol	8		645
MERCEDES	6352	TPU	Diesel	25		4249
MAZDA	LN1212	TPU	Diesel	17		2500
COLES	ΓΕΡΑΝΟΣ	CM	Diesel	145		
CATERPILLAR	ΦΟΡΤΩΤΗΣ	CM	Diesel	170		
CATERPILLAR	ΦΟΡΤΩΤΗΣ	CM	Diesel	170		
MITSUBISHI	ΠΕΡΟΝΟΦΟΡΟ	CM	Diesel	60		
COLES	ΓΕΡΑΝΟΣ	CM	Diesel	145		
MERCEDES	ΠΥΡΟΣΒΕΣΤΙΚΟ	CM	Diesel	230		
JCB	ΕΣΚΑΦΕΑΣ-ΦΟΡΤΩΤΗΣ	CM	Diesel	51		
MITSUBISHI	ΠΕΡΟΝΟΦΟΡΟ	CM	Diesel	60		
CATERPILLAR	ΠΕΡΟΝΟΦΟΡΟ	CM	Diesel	55		
MITSUBISHI	ΠΕΡΟΝΟΦΟΡΟ	CM	Diesel	59		
GINIE	ΚΑΛΑΘΟΦΟΡΟ	CM	Diesel	41		
MAN	ΠΥΡΟΣΒΕΣΤΙΚΟ	CM	Diesel	192		

MERCEDES	ΠΥΡΟΣΒΕΣΤΙΚΟ	CM	Diesel	216		
MERCEDES	ΠΥΡΟΣΒΕΣΤΙΚΟ	CM	Diesel	279		
MITSUBISHI	ΠΕΡΟΝΟΦΟΡΟ	CM	Diesel	59		
NISSAN	ΠΕΡΟΝΟΦΟΡΟ	CM	Diesel	59		
DATSUN	ΠΕΡΟΝΟΦΟΡΟ	CM	Diesel	60		
HYUNDAI	ΠΕΡΟΝΟΦΟΡΟ	CM	Diesel	67		
HYUNDAI	ΠΕΡΟΝΟΦΟΡΟ	CM	Diesel	88		
MAN	ΠΥΡΟΣΒΕΣΤΙΚΟ	CM	Diesel	420		
NISSAN	PICK UP	TPU	Petrol	16		
MERCEDES	612 D	TPU	Diesel	20		2148
MAZDA	B 2200	TPU	Petrol	15		
FORD		TPU	Petrol	14		
MERCEDES	214	TPU	Petrol	16		
MERCEDES	314	TPU	Petrol	16		
MERCEDES	214	TPU	Petrol	16		
FORD	RANGER	TPU	Diesel	15		2198
MERCEDES		TPU	Diesel	15		
NISSAN		TPU	Diesel	17		2488
RENAULT		Bus	Diesel	17		2464
MERCEDES	SPRIDER	Bus	Diesel	15		2148
MERCEDES		TPU	Diesel	88		14618
MERCEDES		TPU	Diesel	38		6374
MERCEDES	1827	TPU	Diesel	57		9558
MERCEDES	1619	TPU	Diesel	57		9506
MERCEDES		TPU	Diesel	72		11946
MERCEDES		TPU	Diesel	25		4249
MERCEDES	704	TPU	Diesel	34		
MAZDA	B 2200	TPU	Petrol	15		
MERCEDES	DAIMLER	TPU	Diesel	72		11939
TOYOTA		TPU	Diesel	17		
NISSAN	D40	TPU	Diesel	16		2488
MITSUBISHI	L200	TPU	Diesel	17		2477
NISSAN	NAVARA	TPU	Diesel	17		2488
V W	AMAROK	TPU	Diesel	14		1968
V W	TRANSPORTER	TPU	Diesel	13		
V W	TRANSPORTER	TPU	Petrol	14		1968
V W	TRANSPORTER	TPU	Petrol	14		1968
MERCEDES	614 D	TPU	Diesel	25		4249
MERCEDES		TPU	Diesel	25		4249
MERCEDES		TPU	Diesel	25		4249
NISSAN	NAVARA	TPU	Diesel	17		2488
NISSAN	NAVARA	TPU	Diesel	17		2488
NISSAN		TPU	Diesel	18		2953
V W	TRANSPORTER	TPU	Petrol	14		1984
V W	TRANSPORTER	TPU	Petrol	14		1968
V W	TRANSPORTER	TPU	Petrol	14		1968
V W	TRANSPORTER	TPU	Petrol	14		1968
PEUGEOT	BOXER	TPU	Diesel	14		1997

PEUGEOT	BOXER	TPU	Diesel	14		1997
PEUGEOT	BOXER	TPU	Diesel	14		1997
MAZDA	B 2200 STD	TPU	Petrol	15		
MITSUBISHI	L200009	TPU	Diesel	17		
FIAT	DUCATO	TPU	Petrol	14		1998
FORD	RANGER	TPU	Diesel	15		2198
NISSAN	NAVARA	TPU	Diesel	17		2488
MERCEDES		TPU	Diesel	88		14618
NISSAN	NAVARA	TPU	Diesel	14		2298
NISSAN	D 22	TPU	Diesel	17		2488
NISSAN	NAVARA DOUBLE CAB	TPU	Diesel	17		2488
NISSAN	YD 25 N1	TPU	Diesel	17		2488
MAZDA	UN 1212	TPU	Diesel	17		2500
NISSAN	D40	TPU	Diesel	17		2488
MERCEDES 2435 L		TPU	Diesel	88		14618
MITSUBISHI CANTER		TPU	Diesel	20		3298

Category: Leased Vehicles

Brand	Model	Vehicle category	Type of fuel	Engine displacement
CINTROEN	C3	PV	Petrol	1199
OPEL	MOVANO	TPU	Diesel	2179
NISSAN	QASHQAI	PV	Petrol	1332
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CUPRA - SEAT	FRMENTOR 1.5	PV	Petrol	1498
SEAT	ARONA	PV	Petrol	999
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
PEUGEOT	208	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
ALFA ROMEO	GIULIA	PV	Petrol	1995
MERCEDES	GLC 200 4MATIC	PV	Petrol	1999
CINTROEN	JUMPY	TPU	Diesel	1499
VOLVO	V40	PV	Petrol	1498
NISSAN	NAVARA	TPU	Diesel	2298
FIAT	DOBLO	TPU	Diesel	1598
MITSUBISHI	SPACE	PV	Petrol	1193
OPEL	CORSA	PV	Petrol	1199
OPEL	CORSA	PV	Petrol	1199
OPEL	CORSA	PV	Petrol	1199
MAZDA	MAZDA 2	PV	Petrol	1490
PEUGEOT	208	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
SKODA	FABIA	PV	Petrol	999

PEUGEOT	208	PV	Petrol	1199
SKODA	KAROQ	PV	Petrol	1498
CINTROEN	C3 S	PV	Petrol	1199
CINTROEN	C3 S	PV	Petrol	1199
MERCEDES	GLC 200 4 MATIC	PV	Petrol	1999
V W	T-CROSS	PV	Petrol	999
ISUZU		TPU	Diesel	1898
MERCEDES	GLC 200 MATIC AUTO 4X4	PV	Petrol	1999
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
FORD	TRANZIT	TPU	Diesel	1499
FIAT	DOBLO	TPU	Diesel	1598
ISUZU	D MAX	TPU	Diesel	1898
PEUGEOT	208	PV	Petrol	1199
MERCEDES	GLA AMG 35	PV	Petrol	1991
MERCEDES	GLC 300 E 4MATIC	PV	Petrol	1999
FORD	TRANSIT	TPU	Diesel	1995
SUZUKI	VITARA	PV	Petrol	1373
SUZUKI	VITARA	PV	Petrol	1373
AUDI	Q5	PV	Diesel	1968
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
BMW	330E	PV	Petrol	1998
RENAULT	CLIO	PV	Diesel	1461
CINTROEN	C3	PV	Diesel	1499
MERCEDES	E200	PV	Petrol	1991
MERCEDES	GLC 200 4 MATIC	PV	Petrol	1991
ISUZU		TPU	Diesel	1898
HYUNDAI	TUCSON	PV	Petrol	1588
SUZUKI	IGNIS	PV	Petrol	1197
FIAT	TIPO	PV	Diesel	1598
V W	CADDY	PV	Petrol	1395
FIAT	FIORINO	TPU	Diesel	1248
SUZUKI	IGNIS	PV	Petrol	1197
ISUZU	BTF	TPU	Diesel	1898
V W	CADDY	PV	Petrol	999
AUDI	Q3	PV	Petrol	1984
SUZUKI	JIMNY	TPU	Petrol	1462
SUZUKI	JIMNY	TPU	Petrol	1462
SUZUKI	JIMNY	TPU	Petrol	1462
SUZUKI	JIMNY	TPU	Petrol	1462
SUZUKI	JIMNY	TPU	Petrol	1462
ISUZU		TPU	Diesel	1898
ISUZU		TPU	Diesel	1898
BMW	X4 XORIVE 20I	PV	Petrol	1998
SUZUKI	JIMNY	TPU	Petrol	1462

SUZUKI	JIMNY	TPU	Petrol	1462
SUZUKI	JIMNY	TPU	Petrol	1462
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
FORD	TOURNEO	PV	Diesel	1995
CINTROEN	C3	PV	Diesel	1499
RENAULT	CLIO	PV	Petrol	1332
BMW	330E	PV	Petrol	1998
ISUZU		TPU	Diesel	1898
ISUZU		TPU	Diesel	1898
ISUZU		TPU	Diesel	1898
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
AUDI	A6	PV	Petrol	1984
PEUGEOT	PARTNER	TPU	Diesel	1560
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
CINTROEN	C3	PV	Petrol	1199
ISUZU		TPU	Diesel	1898
ISUZU		TPU	Diesel	1898
TOYOTA	YARIS ΥΒΡΙΔΙΚΟ	PV	Petrol	1407
CINTROEN	C3	PV	Petrol	1199
ISUZU		TPU	Diesel	1898
ISUZU		TPU	Diesel	1898
ISUZU		TPU	Diesel	1898
FORD	TPANZIT	TPU	Diesel	1995
FIAT	DUCATO	TPU	Diesel	2287
NISSAN	NAVARA	TPU	Diesel	2298
TOYOTA	AURIS	PV	Diesel	1364
KIA	STONIC	PV	Petrol	1248
PEUGEOT	3008	PV	Diesel	1499
CINTROEN	C3	PV	Petrol	1199
OPEL	VIVARO	TPU	Diesel	1598

Category: Leased Management Vehicles

Brand	Model	Vehicle category	Type of fuel	Engine displacement
ALFA ROMEO	TONALE	PV	Petrol	1469
MERCEDES	GLA 250 E	PV	Petrol	1332
DACIA	DUSTER	PV	Diesel	1461
ALFA ROMEO	TONALE	PV	Petrol	1469
SKODA	KODIAQ	PV	Petrol	1498
VOLVO	XC 40	PV	Petrol	1477
BMW	X2	PV	Petrol	1499
VOLVO	XC 40	PV	Petrol	1477
BMW	X1	PV	Petrol	1499
MERCEDES	C 180	PV	Petrol	1496
MERCEDES	GLA 200	PV	Petrol	1595
SKODA	ENYAQ 80	PV	Electric Vehicle	
SKODA	KODIAQ	PV	Petrol	1498
V W	TIGUAN	PV	Petrol	1498
MERCEDES	C 180	PV	Petrol	1496
BMW	X2	PV	Diesel	1496
SUZUKI	VITARA	PV	Petrol	1373
AUDI	Q3	PV	Petrol	1498
BMW	X2	PV	Petrol	1499
VOLVO	XC40	PV	Petrol	1477
VOLVO	XC40	PV	Petrol	1477
MERCEDES	C 180	PV	Petrol	1496
BMW	X1	PV	Petrol	1499
JEEP	COMPASS	PV	Petrol	1332
MERCEDES	CLA180	PV	Petrol	1332
AUDI	Q3 SPORTBACK	PV	Petrol	1498
PEUGEOT	5008	PV	Diesel	1499
HONDA	CR-V	PV	Petrol	1498
BMW	X1	PV	Petrol	1499
MERCEDES	A 200	PV	Petrol	1332
BMW	X1	PV	Petrol	1499
HYUNDAI	TUCSON	PV	Diesel	1598
VOLVO	XC40	PV	Petrol	1477
HONDA	CIVIK	PV	Petrol	1498
V W	ARTEON	PV	Petrol	1498
JEEP	COMPASS	PV	Petrol	1368
PEUGEOT	3008	PV	Diesel	1499
VOLVO	XC40	PV	Petrol	1477

ANNEX III – REFINERY MANAGEMENT SYSTEM CERTIFICATES OF COMPLIANCE WITH INTERNATIONAL STANDARDS

BUREAU VERITAS

Bureau Veritas Certification

MOTOR OIL (HELLAS) CORINTH REFINERIES S.A.

Agioi Theodori, Corinth, 20 100, Hellas

Bureau Veritas Certification Holding SAS – UK Branch certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below

ISO/IEC 27001:2013

Scope of certification

IT Operations of MOH's Corinth Refinery.

Statement of Applicability Version number and release date: v.0.03 - 03/10/2022

Original cycle start date:	**21-January-2023**
Expiry date of previous cycle:	**NA**
Certification / Recertification Audit date:	**NA**
Certification / Recertification cycle start date:	**21-January-2023**

Subject to the continued satisfactory operation of the organization's Management System, this certificate expires on: 31-October-2025

Certificate No. *IND.23.3003/IS/U* *Version:* ***No.*** *1* *Issue date:* ***21-January-2023***

Certification body address: ***5th Floor, 66 Prescot Street, London E1 8HG, United Kingdom***
Local office: ***23, Etolikou Str., 18545 Piraeus, Greece***

UKAS MANAGEMENT SYSTEMS
0008

Further clarifications regarding the scope and validity of this certificate, and the applicability of the management system requirements, please call: **+30-210-4063.000**

UKAS Certificate Template single site rev 3.10 1 / 1 October 22, 2021

MOTOR OIL

TÜVNORD

Certificate

Management system as per

ISO 22301 : 2019

The Certification Body TÜV HELLAS (TÜV NORD) S.A. hereby confirms as a result of the audit, assessment and certification decision according to ISO/IEC 17021-1:2015, that the organization

MOTOR OIL (HELLAS) CORINTH REFINERIES S.A.
Headquarters: 12A, Irodou Attikou Str.
151 24 Marousi
Refinery: Agioi Theodoroi
201 00 Corinth
Hellas

operates a management system in accordance with the requirements of ISO 22301 : 2019 and will be assessed for conformity within the 3 year term of validity of the certificate.

Scope

- **Production, Trading, Supply and Handling of Fuels, Biofuels, Lubricants, Base Lubricants, Paraffins, Asphalt, Sulfur and Special Mineral Products which are carried out at the Corinth Refinery**
- **Administrative Activities performed at the Head Offices**

Certificate Registration No. 054 23 0003
Audit Report No. BS-0058/2023

Valid from 2023-10-18
Valid until 2026-05-07
Initial certification 2023

Athens, 18.10.2023

TÜV HELLAS (TÜV NORD) S.A. Certification Body

TÜV HELLAS (TÜV NORD) S.A.
282, Mesogeion Ave.
155 62 Athens, Greece
tuvhellas.gr

ESYD
MS Certification
No of Certificate 185

TÜV ®

TÜVNORDGROUP

Certificate of Conformity of Factory Production Control

This certificate is issued to:

Manufacturer: **Motor Oil (Hellas) Corinth Refineries SA,**
Agioi Theodoroi, Corinth,
Greece

In compliance with *Regulation 305/2011/EU of the European Parliament and of the Council of 9 March 2011* (the Construction Products Regulation or CPR), this certificate applies to the construction product:

Bituminous mixtures

This certificate attests that all provisions concerning the assessment and verification of constancy of performance and the performances described in Annex ZA of the standard(s)

EN 12591:2009 – Bitumen and bituminous binders – Specifications for paving grade bitumen.

under system 2+, are applied and that the factory production control is assessed to be in conformity with the applicable requirements.

The attached Schedule, of the same date, details the manufacturing location(s), harmonised product standard and product parameters and shall form a part of this certificate.

This Certificate will remain valid as long as the test methods and/or factory production control requirements included in the harmonised standard, used to assess the performance of the declared characteristics, do not change, and the product, and the manufacturing conditions in the plant are not modified significantly.

Certificate No:	**0094/CPR/MAD/1107426/A ENG**
Original Approval:	31 December 2020
Current Certificate:	23 January 2023
Expiry Date:	23 January 2026

LRQA Inspection Iberia, S.A. Notified Body 0094

Teresa Souto LRQA Inspection Iberia TQM

Certificate of Conformity of Factory Production Control No.: 0094/CPR/ MAD/ 1107426/A ENG Schedule

Manufacturer: **Motor Oil (Hellas) Corinth Refineries SA,**
Agioi Theodoroi, Corinth, Greece

Standard	Product name and grade	Manufacturing Plant
EN 12591: 2009	Paving Grade Bitumen: 20 – 30	Agioi Theodoroi, Corinth,Greece
EN 12591: 2009	Paving Grade Bitumen: 30 - 45	
EN 12591: 2009	Paving Grade Bitumen: 35 - 50	
EN 12591: 2009	Paving Grade Bitumen: 40 - 60	
EN 12591: 2009	Paving Grade Bitumen: 50 - 70	
EN 12591: 2009	Paving Grade Bitumen: 70 - 100	
EN 12591: 2009	Paving Grade Bitumen: 100 - 150	
EN 12591: 2009	Paving Grade Bitumen:160 - 220	

Schedule Issue: 02

Date of Schedule Issue: 23 January 2023

LRQA Inspection Iberia, S.A. Notified Body 0094

Teresa Souto LRQA Inspection Iberia TQM

Bureau Veritas Certification

MOTOR OIL (HELLAS)
CORINTH REFINERIES S.A.

12A, Irodou Attikou Str., 151 24 Maroussi, Greece

This is a multi-site certificate, additional site(s) are listed on the next page(s)

Bureau Veritas Certification Holding SAS - UK Branch certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below

ISO 9001:2015

Scope of certification

MANUFACTURING, TRADING AND DITRIBUTION OF FUELS, BIOFUELS, LUBRICANTS, BASE OILS, WAXES, BITUMENS, SULPHUR AND SPECIAL MINERAL OIL DERIVATIVES.

Original cycle start date:	10-12-1993
Expiry date of previous cycle:	NA
Certification / Recertification Audit date:	09-11-2023
Certification / Recertification cycle start date:	29-11-2023
Subject to the continued satisfactory operation of the organisation's Management System, this certificate expires on:	23-12-2026

Certificate No.: GR004281 Version: 1 Issue date: 29-11-2023

UKAS MANAGEMENT SYSTEMS 0008

Signed on behalf of BVCH SAS UK Branch

Certification Body Address: 5th Floor, 66 Prescot Street, London, E1 8HG, United Kingdom

Local Office: 23, Etolikou Str., Piraeus, 185 45, Greece

Further clarifications regarding the scope and validity of this certificate, and the applicability of the management system requirements, please call: +30 210 4063 000

UKAS Certificate Template Multi Site Rev.4.1 28 Aug 2023

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Bureau Veritas Certification

MOTOR OIL (HELLAS)
CORINTH REFINERIES S.A.

12A, Irodou Attikou Str., 151 24 Maroussi, Greece

This is a multi-site certificate, additional site(s) are listed on the next page(s)

Bureau Veritas Certification Holding SAS - UK Branch certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below

ISO 14001:2015

Scope of certification

MANUFACTURING, TRADING AND DITRIBUTION OF FUELS, BIOFUELS, LUBRICANTS, BASE OILS, WAXES, BITUMENS, SULPHUR AND SPECIAL MINERAL OIL DERIVATIVES.

Original cycle start date:	14-12-2000
Expiry date of previous cycle:	NA
Certification / Recertification Audit date:	09-11-2023
Certification / Recertification cycle start date:	29-11-2023
Subject to the continued satisfactory operation of the organisation's Management System, this certificate expires on:	23-12-2026

Certificate No.: GR004282 Version: 1 Issue date: 29-11-2023

UKAS MANAGEMENT SYSTEMS
0008

Signed on behalf of BVCH SAS UK Branch

Certification Body Address: 5th Floor, 66 Prescot Street, London, E1 8HG, United Kingdom

Local Office: 23, Etolikou Str., Piraeus, 185 45, Greece

Further clarifications regarding the scope and validity of this certificate, and the applicability of the management system requirements, please call: +30 210 4063 000

UKAS Certificate Template Multi Site Rev.4.1 28 Aug 2023

1/2

Bureau Veritas Certification

MOTOR OIL (HELLAS)

CORINTH REFINERIES S.A.

12A, Irodou Attikou Str., 151 24 Maroussi, Greece

This is a multi-site certificate, additional site(s) are listed on the next page(s)

Bureau Veritas Certification Holding SAS - UK Branch certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below

ISO 45001:2018

Scope of certification

MANUFACTURING, TRADING AND DITRIBUTION OF FUELS, BIOFUELS, LUBRICANTS, BASE OILS, WAXES, BITUMENS, SULPHUR AND SPECIAL MINERAL OIL DERIVATIVES.

Original cycle start date:	30-11-2020
Expiry date of previous cycle:	NA
Certification / Recertification Audit date:	09-11-2023
Certification / Recertification cycle start date:	29-11-2023
Subject to the continued satisfactory operation of the organisation's Management System, this certificate expires on:	29-11-2026

Certificate No.: GR004283 Version: 1 Issue date: 29-11-2023

UKAS MANAGEMENT SYSTEMS 0008

Signed on behalf of BVCH SAS UK Branch

Certification Body Address: 5th Floor, 66 Prescot Street, London, E1 8HG, United Kingdom

Local Office: 23, Etolikou Str., Piraeus, 185 45, Greece

Further clarifications regarding the scope and validity of this certificate, and the applicability of the management system requirements, please call: +30 210 4063 000

UKAS Certificate Template Multi Site Rev.4.1 28 Aug 2023

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Hellenic Accreditation System

ACCREDITATION CERTIFICATE

No. 297-6

The Hellenic Accreditation System (ESYD), as the national accreditation body of Greece in accordance with the Law 4468/2017,

ACCREDITS

the
Chemical Laboratory of Agii Theodori
of
MOTOR OIL (HELLAS)
Corinth Refineries S.A.

in Agii Theodori, Corinth, Greece

under the terms of the ELOT EN ISO/IEC 17025:2017 Standard and the ESYD Criteria, to carry out tests, as specified in the attached Scope of the Accreditation, which may be revised by decisions of ESYD.

The initial assessment was issued on September 19th, 2006. This Certificate is valid until September 18th, 2026, provided that the accredited body will comply with the above Standard and the ESYD Criteria.

Athens, 18.07.2022

Christos Nestoras
Chairman of ESYD

ESYD is a signatory of the European co-operation for Accreditation (EA) Multilateral Agreement for the activities covered by this certificate.

Bureau Veritas Certification

Bureau Veritas Certification France
Le Triangle de l'Arche
9, cours du Triangle
92937 Paris-la-Défense cedex-Puteaux
Tél. : + 33 (0)1 41 97 00 60

CERTIFICAT

Number: 2BS010292
Numéro :

Bureau Veritas Certification certifies that the company:
Bureau Veritas Certification certifie que l'entreprise :

MOTOR OIL (HELLAS) CORINTH REFINERIES S.A.
12 A Irodou Attikou str., 15124 Maroussi, Greece

complies with the applicable standards and procedures requirements accordingly, to the version as published in the 2BS internet

which is approved by the European Commission as a Voluntary Scheme for demonstrating compliance with the sustainability criteria under Directive 2018/2001 (RED II) of the European Parliament and of the Council

For the **sites listed in Annex I**

Concerning **the materials, and products listed in Annex II**

The certified system user is a **Biofuel Trader.**
Blending and trading of fossil fuels with biofuels.
ETBE Plant, MTBE Plant, HVO Plant

This certificate is valid for a 5 years period, according to the rules established in the document "Requirements for the verification Process 2BS-PRO-02 version 2.1"
Le présent certificat est valable pour une durée de 5 ans, selon les règles définies dans le document concernant le système de vérification 2BSvs "Procedure for the Verification Process 2BSvs -PRO-02 version 2.1»

Start date certificate:	**18/10/2021**
Expiration date certificate:	**17/10/2026**
Date of first certification:	**18/10/2016**

Date/*date : 21/03/2022*

For the President, Laurent CROGUENNEC

BIOMASS BIOFUELS SUSTAINABILITY 2BSvs voluntary scheme

Issuing Office : Bureau Veritas Certification France
Le Triangle de l'Arche - 9, cours du Triangle - 92937 Paris-la-Défense cedex – Puteaux

The certified economic operators are listed on www.2BSvs.org
Liste des opérateurs économiques certifiés sur www.2BSvs.org

* The 2BSvs voluntary scheme (Biomass Biofuels Sustainability voluntary scheme) was recognized by the European Commission by the decision (UE 2016:1433 of 26 august 2016, effective on 28 august 2016"

* *Le schéma volontaire 2BSvs (Biomasse Biocarburants Schéma volontaire sur la durabilité a été reconnue par la Commission Européenne par la décision* UE 2016:1433 *du 26 août de la Commission entrée en vigueur le 28 août 2016*

Bureau Veritas Certification

Annex I - List of sites within the scope of the certificate number 2BS010292

Date de mise à jour /*date of update : 21/03/2022*

This annex may not be presented or reproduced without the certificate to which it relates.
Cette annexe ne peut être ni présentée ni reproduite sans le certificat auquel elle se rattache

Site identification *Identification du site*	**Site Activity**	**Address** *Adresse*	**Postal Code** *Code Postal*	**Town** *Ville*	**Country Code** *Code Pays*
MOTOR OIL (HELLAS) CORINTH REFINERIES S.A. (Head Office)	Trading with storage	12 A, Irodou Attikou str.	15124	Maroussi, Athens	Greece
MOTOR OIL (HELLAS) CORINTH REFINERIES S.A. (Site)	Blending unit Other Treatment / Processing Plant	Agioi Theodoroi	20100	Corinth	Greece

Bureau Veritas Certification

MOTOR OIL (HELLAS) CORINTH REFINERIES S.A.

Agioi Theodoroi, P.O.Box 23, 20100 Corinth, Greece

Bureau Veritas Hellas M.A.E. certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below

Standard

ISO 50001:2018

Scope of certification

MANUFACTURING, TRADING AND DISTRIBUTION OF FUELS, BIOFUELS, LUBRICANTS, BASE OILS, WAXES, BITUMENS, SULPHUR AND SPECIAL MINERAL OIL DERIVATIVES.

Original Cycle Start Date:	07-11-2017
Expiry date of previous cycle:	NA
Certification / Recertification Audit date:	02-11-2023
Certification/Recertification Cycle Start Date:	06-11-2023
Subject to the continued satisfactory operation of the organization's Management System, this certificate expires on:	06-11-2026

Certificate No.: GR004229 Version: 1 Issue date: 06-11-2023

ΕΣΥΔ
Πιστοποίηση ΣΔ
Αρ. Πιστ. 204-7

Certification Body Address: 23, Etolikou Str., 185 45 Piraeus, Greece

Further clarifications regarding the scope and validity of this certificate and the applicability of the management system requirements, can be obtained by consulting the organization. To confirm the validity of this certificate, please contact the number +30-210-4063.000

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Bureau Veritas Certification

Motor Oil (HELLAS)

CORINTH REFINERIES S.A.

Agioi Theodoroi, P.O.Box 23, 20100 Corinth, Greece

Bureau Veritas Hellas M.A.E. certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below

Standard

ISO 18788:2015

Scope of certification

MANUFACTURING, TRADING AND DISTRIBUTION OF FUELS BIOFUELS, LUBRICANTS, BASE OILS, WAXES, BITUMENS, SULPHUR AND SPECIAL MINERAL OIL DERIVATIVES.

Original Cycle Start Date:	29-11-2017
Expiry date of previous cycle:	NA
Certification / Recertification Audit date:	06-10-2023
Certification/Recertification Cycle Start Date:	27-10-2023
Subject to the continued satisfactory operation of the organization's Management System, this certificate expires on:	28-11-2026

Certificate No.: GR004201 Version: 1 Issue date: 27-10-2023

Certification Body Address: 23, Etolikou Str., 185 45 Piraeus, Greece

Further clarifications regarding the scope and validity of this certificate and the applicability of the management system requirements, can be obtained by consulting the organization. To confirm the validity of this certificate, please contact the number +30-210-4063.00

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BUREAU VERITAS

ΒΕΒΑΙΩΣΗ ΤΟΥ ΠΕΡΙΒΑΛΛΟΝΤΙΚΟΥ ΕΠΑΛΗΘΕΥΤΗ ΣΧΕΤΙΚΑ ΜΕ ΤΙΣ ΔΡΑΣΤΗΡΙΟΤΗΤΕΣ ΕΠΑΛΗΘΕΥΣΗΣ ΚΑΙ ΕΠΙΚΥΡΩΣΗΣ

Ο Φορέας Bureau Veritas Hellas M.A.E., με αριθ. μητρώου περιβαλλοντικού επαληθευτή EMAS EL-V-0007 (Αρ. 246-10), διαπιστευμένος για την έκταση δραστηριοτήτων 17.22, 19, 24.42(μερικώς), 25.9, 26.3, 27.12, 31.03, 32.4, 32.99(μερικώς), 38.1, 38.2, 84.11 (κωδικός NACE), δηλώνω ότι επαλήθευσα αν ο χώρος δραστηριοτήτων του οργανισμού ΜΟΤΟΡ ΟΪΛ, Άγιοι Θεόδωροι, Τ.Θ.23, 20100 Κόρινθος, Ελλάδα που αναφέρεται στην περιβαλλοντική δήλωση του οργανισμού ΜΟΤΟΡ ΟΪΛ, Άγιοι Θεόδωροι, Τ.Θ.23, 20100 Κόρινθος, Ελλάδα, ανταποκρίνεται σε όλες τις απαιτήσεις του κανονισμού (ΕΚ) αριθ. 1221/2009 του Ευρωπαϊκού Κοινοβουλίου και του Συμβουλίου, της 25ης Νοεμβρίου 2009, περί της εκούσιας συμμετοχής οργανισμών σε κοινοτικό σύστημα οικολογικής διαχείρισης και οικολογικού ελέγχου (EMAS), όπως τροποποιήθηκαν από τους Κανονισμούς (ΕΕ) 2017/1505 και (ΕΕ) 2018/2026 της Επιτροπής.

Υπογράφοντας την παρούσα βεβαίωση, δηλώνω τα ακόλουθα:

- η επαλήθευση και η επικύρωση διενεργήθηκαν σύμφωνα με τις απαιτήσεις του κανονισμού (ΕΚ) αριθ. 1221/2009, όπως τροποποιήθηκαν από τους Κανονισμούς (ΕΕ) 2017/1505 και (ΕΕ) 2018/2026 της Επιτροπής.
- η επαλήθευση και η επικύρωση επιβεβαιώνουν ότι δεν προέκυψαν στοιχεία μη συμμόρφωσης με τις εφαρμοστέες νομικές απαιτήσεις που αφορούν το περιβάλλον,
- τα δεδομένα και οι πληροφορίες που περιέχονται στην περιβαλλοντική δήλωση του οργανισμού ΜΟΤΟΡ ΟΪΛ, Άγιοι Θεόδωροι, Τ.Θ.23, 20100 Κόρινθος, Ελλάδα παρέχουν έγκυρη, αξιόπιστη και ακριβή εικόνα όλων των δραστηριοτήτων που τελούνται στον οργανισμό ΜΟΤΟΡ ΟΪΛ, Άγιοι Θεόδωροι, Τ.Θ.23, 20100 Κόρινθος, Ελλάδα, εντός της έκτασης που αναφέρεται στην περιβαλλοντική δήλωση.

Το παρόν έγγραφο δεν είναι ισοδύναμο με καταχώρηση EMAS. Μόνον ένας αρμόδιος φορέας δυνάμει του κανονισμού (ΕΚ) αριθ. 1221/2009, μπορεί να παράσχει καταχώρηση EMAS. Το παρόν έγγραφο δεν μπορεί να δημοσιοποιείται παρά μόνο σε συνδυασμό με άλλα έγγραφα.

Πειραιάς, 13.07.2023

BUREAU VERITAS HELLAS M.A.E.
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Μαρία Χαχάλη
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THIS IS TO CERTIFY THAT

Motor Oil Hellas Corinth Refineries S.A.

IS A MEMBER OF JOINT INSPECTION GROUP LTD

MEMBER SINCE	MEMBER UNTIL
January 2019	31st December 2024

MEMBERSHIP NUMBER

24/120

CERTIFICATE ISSUE DATE

February 2024

MARK NEWSTEAD
GENERAL MANAGER

ANGEL MARTINEZ
JIG COUNCIL CHAIR

Joint Inspection Group Ltd
Registered Address: 9 Caxton House, Broad Street, Cambourne, Cambridgeshire CB23 6JN