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ARTICLE 1

Preamble

This Operating Regulation aims to define the terms of operation and use of the existing infrastructure and of the services rendered by the Thessaloniki Business Park Type B (TBP), the rights and obligations of the Established Undertakings (EUs), the fees charged to cover the administration and management costs of the Park, including the additional modernization-related infrastructures and facilities, as appropriate, aiming to ensure the smooth operation of the undertakings established therein, within a perfectly organized and modern business action and development environment, according to the terms and conditions subject to which approval was given for the establishment of the Park. The undertakings established in the TBP must declare explicitly and unreservedly that they have agreed to comply with the provisions of Law 3982/2011, as currently in force, and the delegated acts adopted on the basis of that Law, as well as the provisions hereof.

1. Definitions

- **ETAD:** Environmental Terms Approval Decision
- **VIPATHE SA:** Distinctive title of the Société Anonyme with the name “INDUSTRIAL PARK OF KATO GEFYRA, THESSALONIKI SA” or “**THESSALONIKI INDUSTRIAL PARK SA**”.
- **BPDC:** Business Park Development Company, i.e. the company with the name “THESSALONIKI INDUSTRIAL PARK SA”, or “VIPATHE SA”
- **BPM:** Business Park Manager, i.e. the company with the name “THESSALONIKI BUSINESS PARK MANAGER SA” and the distinctive title “TBPM SA”.
- **CSR:** Corporate Social Responsibility
- **TBP:** The statutory type B Business Park at Kato Gefyra, Agios Athanasios, in the Municipality of Chalkidona, Thessaloniki.
- **EUs:** Established Undertakings. These are all the undertakings which have concluded an Establishment Agreement or had owned properties in the TBP as of the date of publication of Joint Ministerial Decision 14723/807/6-8-2003 (Government Gazette, Series II, No 1234/1-9-2003) and the ones which have concluded contracts in rem or in personam with a view to establishing their undertakings in or transferring them to the TBP up until the date of publication hereof.
- **EnCo:** The Environmental Committee is the main collective body responsible for handling environmental issues relating to the TBP, where collective consultation is required for decision making purposes.

- **INFRASTRUCTURE PROJECTS:** the road, water supply, sewerage, rainwater drainage, telecommunications or broadband networks, fire fighting network, green areas irrigation network, electric lighting networks, public utility network connection works, sewage treatment plant, sewage disposal and water supply pipelines, landscaping works, surroundings formation works, any railway connecting works and any works intended to provide services relating to the key functions of the established undertakings or to protect the environment.
- **AC:** Administration Center. This is the Central Administration building erected by the BPDC to house all TBP Operating Departments and to make available or lease out individual spaces used to house various support services, such as a fire station, a first aid station, a day-care station, restaurants, product display facilities, presentation/conference rooms, employee training rooms or other spaces intended for educational activities, facilities intended for quality control purposes or other similar activities, on condition that the relevant legal requirements are satisfied.
- **JOINTLY-USED SPACES AND FACILITIES:** the green areas, squares, parking lots, roads, pavements, sports facilities, infrastructure areas and installations, including the infrastructures of the future railway interconnection which may be constructed in the jointly-used areas based on Design No 4.414.888/20.06.2008, as ratified by the National Railway Infrastructure Manager, and all the facilities lying in jointly-used areas and intended to provide services to the EUs.
- **EMR:** Environmental Management Regulation. This is the special regulation that sets out explicitly the general and specific obligations on the protection of the environment by each undertaking which is, or will be, installed in the TBP.
- **CWTDP:** Central Waste Treatment and Disposal Plant
- **JMD:** Joint Ministerial Decision
- **STP:** Sewage Treatment Plant
- **PPE:** Personal Protective Equipment
- **EIA:** Environmental Impact Assessment
- **PAT:** Prefectural Authority of Thessaloniki
- **BSP:** Grid Street Plan
- **HSP:** Health and Safety Plan
- **EP:** Emergency Plan
- **Consent / Approval / Permit / Certificate of Compatibility:** Any permit, approval, consent, opinion or license granted by the BPDC or the BPM in response to any written requests filed by the EUs concerning exercise/performance of their mutual rights and obligations under this regulation and the applicable legislation as in force each time. Such opinion shall be

binding on the EUs and shall supersede, but not substitute, any other permit that needs to be obtained by the EUs from State Agencies and bodies.

- **Establishment Agreement:** A relevant contract in rem or in personam concerning the establishment of an undertaking in or transfer thereof to the TBP.
- **HSF:** Health and Safety File
- **Landfill:** A site used for the disposal of waste materials.

2. Development and Management - Administration of the TBP

2.1. Business Park Development Company The TBP is a statutory type B Business Park made subject to Law 3982/11, which was established initially and delimited on the basis of Law 2545/97 by JMD 14723/807/06-08-2003 (Government Gazette, Series II, No 1234/01-09-2003) of the State Secretaries for Development and for the Environment, Physical Planning and Public Works, as amended by JMD Φ/A.6/1/30827/2733 (Government Gazette, Series II, No 1223/17-07-2007) of the Ministers for Development and for the Environment, Physical Planning and Public Works. The BPDC of the TBP is the Société Anonyme with the name “INDUSTRIAL PARK OF KATO GEFYRA, THESSALONIKI SA” and the distinctive title “**VIPATHE SA**” or “**THESSALONIKI INDUSTRIAL PARK SA**”, hereinafter referred to as “**BPDC**” or “**VIPATHE SA**”. Type B Business Park means the area defined, delimited, town planned and organized according to the provisions of Part III of Law 3982/11, to host activities causing medium- and low-level disturbance. VIPATHE SA means the body that took the initiative to **organize and develop** the TBP and undertook the elaboration and implementation of the initial Operating Regulation as well as the management and administration of the Business Park up until such management and administration are transferred to the BPM of the TBP.

2.2. Business Park Manager: This Regulation governs the management, administration and overall operation of the TBP, by setting the rules of operation and use of the existing infrastructures and services rendered, the rights and obligations of the EUs and how to cover the management and administration costs incurred in connection with any existing jointly-used infrastructures and facilities, to ensure the smooth operation of the Park and, therefore, the smooth and unhindered operation of all EUs, according to the terms and conditions subject to which approval was given for the establishment of the TBP. In this Regulation the **TBP Manager** will also be referred to, for the sake of brevity, as “**TBP BPM**” or “**BPM**” or “**TBP Manager**” or “**TBPM**”. The BPM will have to carry out all the actions relating to the **operation** of the TBP, **maintenance** of the infrastructure and **rendering of services**, as described in this TBP Operating Regulation. The BPM will aim to ensure the rights and obligations of all EUs and regulate the relations between the EUs and the BPM, to prevent any actions and behaviors on the part of the EUs which would be incompatible with

both the legislation in force and the provisions hereof, as this could cause problems to other EUs. The BPM will also have to ensure that all EUs obey the law and perform their obligations, thus ensuring the smooth and unhindered operation of the Business Park, aiming to deal with all EUs on a non-discrimination basis and protect the environment.

3. Implementation of the Operating Regulation - Responsibilities of the BPDC and the BPM.

3.1. After transfer of the management and administration by the BPDC to the BPM, the latter took over all the management and administration responsibilities and the former was relieved of all its duties and obligations relating to the implementation of the Operating Regulation up to that date. The BPDC will no longer perform any management and administration duties over the TBP. However, it will still be a shareholder of the BPM due to its being the owner of plots, and will remain, at discretion, a member of its Board of Directors (BoD) even after all its properties are disposed of.

3.2. By way of derogation from paragraph 3.1 above, even after transfer of the management and administration by the BPDC to the BPM, the provisions of Articles 3 and 4 will be implemented by the BPDC for each one of the properties it owns only up until the initial transfer of said property by the BPDC. After the initial transfer of said property by the BPDC, the BPM will be the sole body meant in Articles 3 and 4.

3.3. This Regulation will be binding, as regards adherence thereto, on each legal or natural person that concludes a contract in rem or in personam with the TBP or is linked to the TBP in any other way, including but not limited to the BPDC and the BPM, the EUs the owners and the undertakings deriving rights from the owners. According to Decision No 5839/2008 of the Secretary-General of the Region of Central Macedonia ratifying Implementing Act No 7726/2.10.2007 of the approved amended town planning design of the TBP, the TBP Building Blocks on which buildings are to be erected are the ones shown in Table 1 of Article 21(3) hereof, of which, as of the date of ratification of the above Implementing Act, Building Blocks Nos 2 and 5 were owned by MEL SA and rest of the Building Blocks were owned by the "INDUSTRIAL PARK OF KATO GEFYRA, THESSALONIKI SA" (VIPATHE SA).

CHAPTER I
TERMS AND CONDITIONS FOR THE ESTABLISHMENT AND OPERATION
OF UNDERTAKINGS IN THE TBP

ARTICLE 2

Permitted activities

1. Pursuant to Article 43(1) of Law 3982/2011, activities causing medium- and low-level disturbance will be established in or transferred to the TBP.
2. The type of activity and the operation of an EU must be compatible with the environmental conditions and the general terms on the establishment of the TBP, according to the provisions of JMD Φ/A.6/1/30827/2733 (Government Gazette, No. 1223/03-07-2007) in conjunction with Articles 41(1-b) and 43(1) of Law 3982/11. And the classification of an undertaking under a low- or medium-level disturbance category, as required by the JMD referred to above, must be substantiated by evidence from the competent departments.
3. The establishment, transfer and operation of the undertakings falling under the scope of Law 3325/2005 on the establishment and operation of industrial-handicraft premises and Part II of Law 3982/2011 on the simplification of the authorization procedure for manufacturing activities, will always be implemented in accordance with the provisions of the above laws and in compliance with the legislation in force each time.
4. The BPDC may, among other things, reject an expression of interest for the establishment of undertakings if the activity of these undertakings causes risks of explosion, escape of asphyxiating/toxic gases, or leak of corrosive, toxic or caustic liquids or of substances in general which, at such concentrations as expected from the usual functioning of the undertaking, may cause harm to people or property.
5. It should be stressed, that the above requirements will apply both during the construction and operation of an EU at all the stages relating to the production, packaging, storage, transfer of raw and auxiliary materials or finished products, as well as disposal of gaseous, liquid and solid waste.
6. The AC will be used for the establishment of the required public utility and support companies, which will render services to the EUs and/or the wider area, in the latter case only if there is sufficient space to be made available for the relevant services.

Following are some of the services to be rendered and co-housed in the AC:

- The offices of the BPM headquarters
- Bank
- Post office

- Secretarial support, printing, photocopying, etc. office
- Park security office
- Maintenance and repair shop
- Fire Department office
- Infirmary - First Aid center
- Office operating a workers/technicians database or making available employees
- Machinery and vehicle rental service, transportation, etc. service providers' office
- Technical & financial consultant's office
- All-purpose room
- Restaurant - cafeteria
- Mini market
- Books, stationary and office supplies store
- Police Station
- Any other support activity, as appropriate

7. Any contract for the establishment, transfer and overall development of a public utility activity by a public agency, a legal person governed by public law or an individual on/in/to a plot or building which is jointly-used or jointly-owned will be entered into by the BPM, at discretion and with a view to securing the rights of the TBP and ensuring the optimal organization and provision of public utility services to land owners and EUs.

8. The BPM may, at the initiative of the BoD or at the request of the EUs, conduct a tender for the supplies/services to be rendered to all or part of the EUs, aiming to ensure that their different needs are dealt with in a uniform manner and economies of scale are created to the benefit of the EUs. Each individual EU shall have the discretion to accept the results of such procedures or not.

9. Following submission of a special technical & financial study and an environmental impact assessment to the BPDC and after the latter has accepted the above study and assessment, the competent Authority may allow the establishment of a power plant causing up to medium-level disturbance in one or more of BPDC's plots, which will be transferred by the BPDC solely for this purpose.

10. The BPM may develop and/or operate a guarded parking facility in a jointly-used area of the TBP and provide relevant support services.

11. The property owners and/or EUs may see to it that photovoltaic systems are installed on the rooftops of the TBP buildings, after approval is given by the competent bodies.

12. Any "mandatory", as defined in Article 16, service that was not rendered by the BPDC may be developed by the BPM.

13. The BPM may have a telecommunications antenna installation operated by third parties, by leasing out a specific area in the TBP.

ARTICLE 3

Establishment procedure and requirements

1. For an EU to be established in or transferred to the TBP on the basis of an Establishment Agreement, it must express its interest to the BPM or the BPDC using a dedicated form, in which it will provide the necessary economic, technical and environmental information.

a. The interested party must necessarily include in that form, which will constitute a Solemn Declaration pursuant to Law 1599/1986, the following information:

- the type of activity, using the code assigned by the National Statistical Service of Greece (NSSG), the production capacity and the relevant technical data;
- the disturbance level classification, based on the relevant JMD;
- the estimated investment amount;
- the type and estimated daily quantity of solid waste generated by the activity concerned;
- the BOD type and load, as well as the estimated daily supply of liquid waste (sewage) from the activity concerned to be channeled into the central drainage network, which must be compatible with the CWTDP specifications;
- the type and estimated daily supply of gaseous waste generated by the activity concerned.

b. As regards specific activity categories which the BPDC or the BPM feels that do not fall under the usual production process for the manufacture and movement-storage of raw materials or products, e.g. generation of energy, production of biofuels, recycling centers, vehicle dismantling centers, etc., the form used for the expression of interest must necessarily be accompanied by a technical & financial report and an environmental impact assessment.

2. If the interested party is not the land owner, the expression of interest must be co-signed by the owner, also stating the key conditions of the contract in rem or in personam entered into by and between them. For the BPM to consider the relevant request, the required proof of payment must be submitted for all the sums owed by the owner to the BPDC, the BPM, PUO organizations, the Municipality, etc. In that case, a positive reply from the BPM to the expression of interest in establishing/transferring an undertaking shall be deemed to constitute also acceptance of the contract concluded by and between the owner and the third party, subject to the additional condition that the future EU will be jointly and severally liable to pay the joint and other expenses charged on the property up until the Establishment Agreement is signed.

3. The BPM will, at its absolute discretion, make a reasoned decision within a deadline of one (1) month, which may be extended by not more than one (1) more month, of the date of submission of the expression of interest and any other required documentation, taking into account, among other things, the compatibility of the overall establishment of the above undertaking with the legal framework that governs the TBP, the suitability of the establishment/transfer location of the

interested undertaking in/to the TBP and of the plot concerned each time, the adequacy of the relevant infrastructure networks, the resulting traffic burden on the road network in the TBP and the wider area, the volume and type of the required raw materials, the environmental impact from the functioning of the existing and future EUs, as well as the health and safety of the TBP employees and the residents in the wider area.

4. The reasoned reply, as per the above, on the establishment/transfer of an undertaking should be communicated to the undertaking concerned. The undertaking concerned must come and sign the Establishment Agreement, pursuant to Article 4 hereof, within such a deadline as specified in the above reply.

5. The TBP property will be delivered to the relevant beneficiary each time after the requirements for accepting the expression of interest are satisfied and the contracts required by law and hereby are signed.

6. The establishment/transfer of undertakings in/to the TBP will take place after the owner has transferred to the party being established the ownership of the all or part of the plot and/or building concerned, as located in the TBP, by establishing a right in rem thereupon or by leasing it out or by entering into a different contractual relationship.

7. The Establishment Agreements should, on pain of annulment, always take the form of a notarial deed. The EUs must state explicitly and unreservedly in the Establishment Agreement that they have accepted all the provisions of the Operating Regulation, to which they will become parties.

8. As regards erection of its building facilities and its overall establishment and operation in the TBP, an EU must have obtained all required Permits from the competent Public Departments and must comply with the requirements laid down in the TBP Town Planning Design - Grid Street Plan, pursuant to Article 5 hereof.

9. Each EU must have its facilities insured by entering into one or more insurance policies with a recognized and solvent insurance company. A copy of the insurance policy must be submitted to the BPM, pursuant to Article 17.

10. The provisions hereof will also apply to and be binding on the EUs if the ownership of the properties is transferred to third parties or if the properties are leased out or their use is ceded to third parties in any way whatsoever.

11. The fact that the BPM becomes aware of and/or consents to and/or approves and/or accepts requests, applications, declarations, etc. submitted by the EUs or third parties to the BPM will not release these parties of the responsibility or obligation they have towards the competent authorities, departments or bodies to obtain any required permits, approvals, etc. neither will it make the BPM jointly liable towards such authorities, departments or bodies.

12. Each EU submitting, for any reason whatsoever (e.g. for approval, information or other purposes) to the BPM any documents, attestations, applications from and to the authorities,

departments and bodies will be held exclusively liable for the accuracy, validity and completeness of the documentation submitted and will bear any costs resulting from the above documents, attestations or applications.

13. Any fines and/or sanctions and/or surcharges and/or remedial measures imposed by the competent authorities, departments and bodies on the BPM and/or the BPDC for actions or omissions which were due to the fault of the owner / the EUs / the user will be borne and paid in full by the liable party, irrespective of whether other fines or sanctions or surcharges or remedial measures have also been imposed on that party for the same reason, and the liable party shall fully indemnify the BPM and/or the BPDC for any cost or loss arising on that account.

ARTICLE 4

Establishment Agreements

1. The BPM will, on pain of annulment, also be a third contracting party to each **Establishment Agreement** that is entered into as regards the rights and obligations of the EU relating to the management and administration of the TBP, and the notarial deed drafted will be declared a clear and enforceable title for satisfying the monetary claims raised by the BPM against the EU, given its obligations, according to this Operating Regulation. The Establishment Agreement must necessarily include:

- the terms of establishment and operation of the undertakings to be established;
- the arrangements concerning the deadlines for commencement and completion of construction works;
- an explicit and unreserved declaration concerning the undertaking to be established/transferred to the effect that it has accepted the application of the provisions of Law 3982/11 and has agreed to become subject to such provisions, the implementing acts adopted on the basis thereof, the applicable JMD on the establishment of the TBP, the provisions hereof and of the Statutes, as well as the decisions of the competent bodies of the BPM, as in force after any amendments made thereto;
- the rights and obligations of the BPM to the established undertaking if it fails to comply with the terms laid down in said Establishment Agreement and the Operating Regulation. These may include, but not be limited to, the irrevocable authorization granted to the BPM to suspend or terminate the provision of public utility services to the offender-undertaking, the BPM's right to appeal to the authorities and/or departments responsible for terminating the operation of the EU, the BPM's right to lift the infringement committed at the cost of the offender-undertaking, etc.

2. An undertaking established in the TBP may not change its intended production activity without written consent from the BPM. That prohibition will also apply to the universal and specific successors of the initial owners or lessees. Any change made to the intended

production activity of an undertaking despite the prohibition and without the above consent will be void and null to the BPM, the latter being under obligation to take all legal action before the issuing authority to revoke the EU's operating authorization. It is also prohibited to increase the total capacity of an EU in the TBP and/or to change its production method without consent from the BPM, as this might infringe the terms of establishment in the TBP or lead to exceeding the limits imposed on the TBP in its entirety.

3. To ensure compliance with the conditions of establishment of an undertaking in the TBP, the BPM will be entitled to carry out ordinary or extraordinary audits both at the time of establishment and during the operation of the undertaking, and if it is found that these conditions have been infringed, the BPM will be entitled to inform and urge the healthcare and other competent authorities and/or departments to impose such sanctions as required by law.

4. No Establishment Agreement needs to be signed by the undertakings already established in the TBP prior to publication of this Regulation, which will become, ipso jure, subject to the provisions hereof, thus enjoying the relevant rights and being required to adhere to its provisions.

5. For an undertaking to start its operation, it must have completed the facades of its buildings and the planting and landscaping works in its surroundings to such a degree that will ensure safe and unhindered access and departure of vehicles and pedestrians to and from the its surroundings and the buildings.

6. The provisions of this Article will also apply to all the universal and specific successors of the initial owners or lessees.

CHAPTER II

BUILDING REQUIREMENTS, RIGHTS AND OBLIGATIONS OF PROPERTY OWNERS AND ESTABLISHED UNDERTAKINGS

ARTICLE 5

Building Requirements - Grid Street Plan

1. The Town Planning Design - Grid Street Plan and the Building Requirements and restrictions are specified in Decision ref. 1709/13-8-2002 (Government Gazette, Series IV, No 848/1-10-2002) of the Secretary-General of the Region of Central Macedonia, as amended by Decision ref. 10261πε/22-03-2006 (Government Gazette, Series IV, No 308/14-4-2006) of the Secretary-General of the Region of Central Macedonia and then by Decision ref. 7726/2-10-2007 (Government Gazette, Series for Expropriations and Town Planning, No 476/26-10-2007) of the Secretary-General of the Region of Central Macedonia.
2. The owners and the undertakings established in the TBP will be under obligation to comply with the provisions of this Article, as referred to in JMD 14723/807/06-08-2003 (Government Gazette, Series II, No 1234/01-08-2003), JMD Φ/A.6/1/30827/2733/3-7-2007 (Government Gazette, Series II, No 1223/03-07-2007) and the Town Planning Regulation for the area in which the TBP is located (Decision No. 7726/2-10-2007 [Government Gazette, Series for Expropriations and Town Planning, No 476/26-10-2007] of the Secretary-General of the Region of Central Macedonia).

ARTICLE 6

Rights and obligations for established undertakings

1. Each work carried out in the TBP must conform to the construction and safety terms and conditions laid down in the town planning and other legislation in force. Before construction works are started, the buyer or the holder of the legal right to use the plot on the basis of any lawful arrangement will be bound and required to submit to the BPM the main part of the building permit, the approved Coverage Diagram and the approved side views, as well as to notify the contractor appointed to construct the project when the awarding contract is signed.
During the execution of works, the BPM may request submission of the designs relating to the infrastructure works or those that might affect adjacent properties.
The construction company chosen as the general contractor appointed to erect the facilities must have obtained certification according to ISO 14001: 2005 concerning environmental protection and OHSAS 18001 of 2007 concerning health and safety. Moreover, all the provisions of the applicable Greek legislation on occupational health and safety must be complied with. A copy of the Health

and Safety Plan (HSP) and of the Health and Safety File (HSF) must also be submitted to the BPM.

All the worksites must, in addition to adhering to the health and safety and environmental protection measures contemplated in the legislation in force, take special care as regards the organization of the required worksite support facilities, e.g. changing rooms, toilets, car parks intended for private cars, trucks, project machinery, etc. in their privately-owned plots.

The BPM must see to it that a uniform information sign is put up at the entrance to the worksite, dimensioned 2.00x1.00, which will be used at all worksites in the TBP. The signs will show the details of the Project Owner, the Project title, the details of the Designers, the Supervising Engineers and the contracting companies involved, the building permit number, the telephone number used to contact the Project Owner's representatives and the telephone numbers used to contact the worksite health and safety engineers.

2. The owners/users of the plot in the TBP must, within three years of signature of the Establishment Agreement obtain a building permit for erecting the facilities and must, within four (4) years of issuance of the building permit, complete the construction of building facilities of a surface area equal to not less than thirty per cent (30%) of the approved coverage, all the facades to the jointly-used areas and the wall around the plot, as well as to develop in the property the business activity contemplated in the Establishment Agreement. The BPM is hereby authorized to grant the required extensions, upon submission of a reasoned request by the EUs.

3. No EU is permitted to drill a water supply borehole or open absorptive and septic cesspools in a privately-owned plot.

4. The water supplied in the TBP will be drawn from boreholes.

The water management (update of water, measurement of the quantity of water, supply of water to the plants, network maintenance and allocation of costs) will be done by the BPM.

5. Any connection of an EU's facility to the hydraulic infrastructure networks (water supply, sewerage and stormwater drainage) and the telecommunications network will be constructed with consent from the BPM.

6. The EUs must become thoroughly acquainted with and apply and adhere to all the provisions laid down in the applicable JMD on the approval of the environmental conditions of the TBP, as well as those laid down in the applicable health and safety legislation. Based on these provisions, terms and restrictions will be imposed as necessary, to be complied with during construction and when the established activities are carried out, with a view to protecting the environment from all types of pollution (noise and vibrations, gaseous, liquid and solid waste).

Where there is liquid waste (sewage) generated by an EU which needs special pre-treatment, it must prepare an appropriate waste pre-treatment study, which is a prerequisite for obtaining consent from the BPM for connecting the plant to the sewerage network. Stormwater will be drained via an extensive drainage network (gratings, drains, trenches, channels, pipelines, etc.) and

channeled into a final collecting facility through two stormwater pumping stations. Generally, stormwater from the EUs will be collected and channeled into the existing infrastructure via a suitable network connected to the closest stormwater drains after a relevant design is submitted to the BPM for approval. Channeling stormwater freely into jointly-used roads or walkways is forbidden.

7. Users of the TBP sewerage network must pay a one-off connection fee (which will be fixed by decision of the BPM's BoD and will not exceed EUR 0.20 per square meter of building surface area), and their pro rata share in the waste treatment and disposal costs, which will be allocated as part of the joint expenses.

8. The EUs must, for aesthetic reasons, keep the buildings they use, and in particular their facades and unsheltered areas, in good condition and neatly trimmed, according to the requirements laid down in the Establishment Agreement.

9. The EUs must construct and maintain recesses on the fences of their plots, to be used for placing at least five (5) municipal waste bins, to allow waste collection and removal by the competent operator. The bins will be in different colors, to make possible the collection of different recyclable materials, will be suitable for use by municipal waste collection vehicles employing mechanical lifting systems and will conform to such specifications and certifications (ISO, DIN, etc.) as specified by the BPM, or will be at least compatible with the systems used by the Municipalities. The EU will be responsible for procuring and making available these bins, and their number will be proportionate to the volume of waste generated by each undertaking. The BPM may propose a specific type of bins to be chosen and procured for all the EUS, following a tender procedure. The BPM will also consider the possibility of making arrangements for the Municipality or a different municipal waste collection service provider to supply the bins and/or render the relevant services.

10. The waste will be collected and removed by competent operators using suitable equipment (transportation vehicles) and staff and will be disposed of at duly authorized municipal waste disposal sites. If there is bulky or hazardous industrial waste, the EU concerned must have it collected at its own cost.

11. The EUs must faithfully adhere to the above requirements, as well as all the applicable regulations adopted by the competent health authorities and must obey all the instructions given by the competent authorities.

12. If the BPM establishes that any of the above provisions have been infringed, it must take appropriate steps, including but not limited to urging the offender to remedy the infringement. If the offender fails to comply, the BPM must proceed to remedy the infringement at the offender's cost, report the infringement to the competent authorities and/or departments, request the competent authorities and/or departments to suspend the rendering of relevant services or revoke the operating authorization issued to the offender's undertaking until the latter complies.

13. The EUs will, upon completion of the construction or remodeling of buildings, infrastructures and connections, deliver to the BPM a folder including a set of the 'as built' drawings in electronic

format, as well as a hard copy thereof, which the BPM must keep on a database with a view to making sure that there is a full mapping of the aboveground and underground interventions made in the TBP. The folder with the 'as built' drawings to be delivered will also include the main part of the building permit, the approved coverage diagram, the topographic diagram and the surroundings drawing, the fire protection study and the plan views, as well as a technical description of the installations in relation to the load-carrying structure, the side covers, coatings, insulations, and the E/M installations in relation to the fuel tanks.

14. The EUs must, also in accordance with the EMR below, submit to the BPM and keep up-to-date "Emergency Plans" (EPs) and fire safety plans. They must also appoint an environmental officer and an emergency officer, who will notify the BPM's contact person immediately to coordinate their actions.

ARTICLE 7

Yard area of Established Undertakings

1. The yard area of the EUs may not be used to store and load/unload products and raw materials which might cause atmospheric pollution or block/contaminate the sewerage and stormwater drainage networks (e.g. storage or loading/unloading in each undertaking's yard area of all types of bulk materials or materials packaged in paper or plastic bags or chemicals in liquid/solid form contained in small or large packages).
2. The EUs may not set up unsheltered disposal areas for garbage or useless objects inside or outside the buildings. The EU must, if so required, specifically arrange storage areas in the plot to store temporarily industrial waste and bulky or municipal industrial waste. Such temporary storage must not cause any environmental impacts, leaks and odors. For example, the storage equipment used will include containers, standard wheeled bins, a specifically arranged area, presses and all other approved storage equipment, depending on the type and quantity of waste. Each EU must see to it that all the waste and useless materials that may be accumulated in unsheltered areas of the undertakings, as well as all used packaging and transportation materials are taken outside the TBP area at least once a week. Generally, the EUs must keep their plant areas clean and in good condition, in compliance with the health and safety rules and aesthetic requirements.
3. Creating a green area is mandatory and must be done at least in accordance with an approved planting design included in the building permit, which must stipulate, among other things, that trees and bushes should be planted in the perimeter of each building block, also specifying the relevant density, number of rows and linking plants.
4. Building a wall around the plot is mandatory and must be done in accordance with such drawings and specifications as approved by the BPM. The type of fence to be used is shown in Figure 1 below. The dimensions may vary subject to the limits permitted by the General Building Regulation. If the EU wishes

to construct a different type of perimeter wall, it must submit a request to the BPM and obtain the BPM's consent before the building permit is issued. This provision pertains to the walls built around the plots after this Regulation is published.

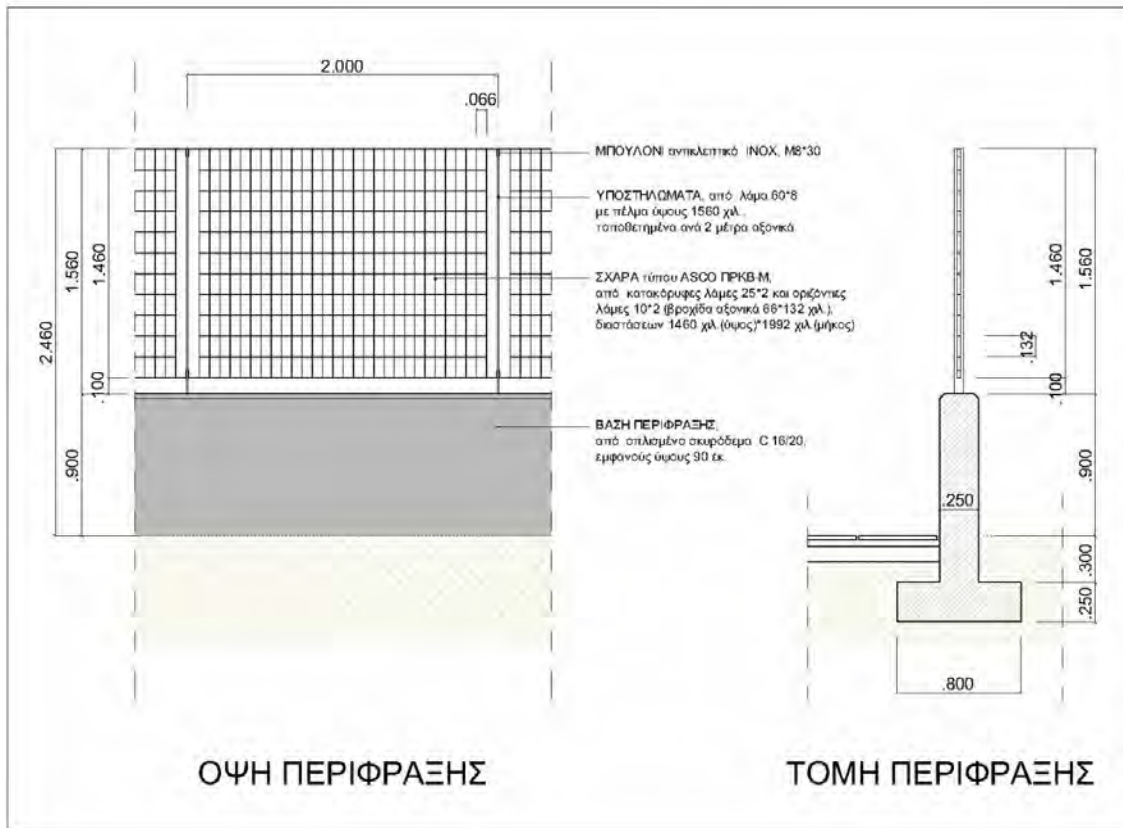


Figure 1 Type of fence used for industrial plots

ARTICLE 8

Promotion of Established Undertakings

1. The BPM reserves the right to specify where and how the EUs will put up promotional messages in the jointly-used areas and to put up information signals or signs in the various areas of the TBP, the cost of which will be borne jointly by the EUs.
2. The BPM may suspend the promotion of the EUs if the latter fail to pay the joint expenses charged on them. In that event, the BPM may remove the EUs' promotional signs.
3. Signs or messages with the EU names may be put up only in the privately-owned areas of each EU. The signs will be put up on the facades of the buildings and on the perimeter wall of the plots. As regards the entrances to the EUs in particular, it is mandatory to put up on the perimeter wall a sign dimensioned approximately 3.00x1.00 m indicating the EU name and address (building block and street). The EUs must put up signs with their respective names and an 'arrow' directing to the entrance to their facilities at the corners of their plots and on the perimeter wall, to provide

visitors to their undertakings with effective information. These will be one-piece signs with black fonts against a white background, dimensioned 80x20 cm, in accordance with such specifications as set out by the BPM. It is also permitted to put up promotional signs on poles erected on the Grid Street Lines or in their yard areas.

4. The BPM may decide to authorize, for a fee and after concluding a relevant contract, third parties to promote their products and/or undertakings in jointly-used areas, including pavements. The relevant revenue will be collected by the BPM to set up a reserve to be used for improving the management and administration infrastructures and the organization of the TBP.

ARTICLE 9

Protection of jointly-used facilities

1. The EUs must take all possible care to prevent damages to the jointly-used areas (roads, parking lots, green areas, sewerage pipelines, culverts, water supply pipelines, street lights, signs, etc.) of the TBP and must indemnify the BPM and the competent Public Utility Organization for any damage that they may have caused due to negligence to the electricity and telecommunications installations and networks, etc.

2. The following procedure will be used for any work to be carried out by an EU in the jointly-used areas with the consent of the BPM, e.g. connecting to the TBP networks:

2.1. The undertakings will file a request with the BPM for carrying out the work concerned, along with the relevant drawings and budgeted expenditure and will deposit a sum of money as collateral or will submit a Letter of Guarantee amounting to not less than 50% of the expenditure involved. Should the BPM disagree with the amount of the expenditure, such amount will be determined on the basis of the unit prices used for Public Works.

2.2. Prior to commencement of the works, the BPM's technician in charge will be notified, to attend the commencement of the works and, at discretion, the execution of such works.

2.3. Upon completion of the works, the technician in charge will, within ten (10) days of the relevant work completion notice, draw up a relevant report certifying that the construction was completed in a workmanlike manner.

2.4. After the above actions are completed, the sum of money deposited as collateral will be refunded (without interest) or the Letter of Guarantee will be handed back to the undertaking.

2.5. If there are construction defects or damages identified during execution of such works, the EU will be instructed to remedy them immediately, or the relevant remedial works will be carried out by the BPM on behalf of the EU and the relevant costs will be deducted from the sum of money deposited as collateral. If the sum of money deposited as collateral is insufficient, the EU will be the sole party liable to cover the relevant expenditure.

2.6. The above procedure may be circumvented only in emergencies, where a failure needs to be corrected or a risk must be prevented urgently.

CHAPTER III

RIGHTS AND OBLIGATIONS ON JOINTLY-USED PROPERTIES, FACILITIES, ETC.

ARTICLE 10

Use and maintenance of jointly-used areas, things and facilities

1. No objects, raw and auxiliary materials, machinery or other installations may be placed on pavements, roads, squares and jointly-used areas in general.
2. The green areas will be formed in accordance with such mandatory specifications as laid down by the BPM and at least in accordance with the JMD concerning the TBP. It is mandatory to retain, maintain and take care of the green areas in the TBP.
3. The putting up of lights in the jointly-used areas and information or advertising signs falls under the exclusive responsibility of the BPM. The functioning of road lights is mandatory.
4. The use of jointly-used areas for purposes other than those provided for herein (pedestrian and vehicle traffic, vehicle parking, green areas, special facilities) and those specified in the approved Town Planning Design is forbidden.
5. No EU or third party is permitted to occupy or fence, permanently or temporarily, any roads, pavements or jointly-used areas.
6. It is strictly forbidden for the EUs to put up any type of signs in the jointly-used areas (pavements, roads, etc.).
7. Infringing any of the above provisions will enable the BPM to instruct the offender to remedy the infringement and, if the latter fails to comply, the BPM will have the right to lift the infringements at the offender's cost and to report them to the competent authorities.

ARTICLE 11

Traffic arrangements

1. The BPM reserves the exclusive right to regulate the direction of pedestrian and vehicle traffic in the TBP areas and to take care of any traffic-related problems that may arise, in cooperation with the competent authorities.
2. The EUs must update and submit traffic arrangement drawings/designs for the entry/exit points of their properties, for the BPM to appoint expert designers to prepare and/or update the relevant traffic arrangement designs with a view to ensuring the smooth flow of traffic in the TBP. The BPM will have the right to request that the EUs' traffic arrangements be amended, to ensure the smooth and safe flow of traffic in the TBP.

- 3.** Where the EUs need to apply temporary changes to the traffic arrangements in the TBP (e.g. when constructing or repairing buildings, bringing in equipment, etc.), they will contact the BPM, submitting the proposed traffic arrangement drawing/design and specifying how for long the temporary change needs to be in place. The BPM will, in consultation with the EU, approve the temporary change or suggest an alternative arrangement, with a view to both making sure that the EU's needs are met and the TBP remains easily accessible and safe. Where space is needed for the worksite employees to park their vehicles in the TBP areas during construction of the project, the EU will have to request permission from the BPM.
- 4.** The Traffic Code, as in force each time, will apply in the TBP too.
- 5.** Vehicles may be parked for a fee only where parking is permitted by the road signage design and provided that the relevant facilities are constructed and the relevant services are provided (e.g. security) in specifically designed areas (parking lots). Products or raw materials must be loaded/unloaded only in the undertaking's privately-owned areas, and both the loading/unloading and transportation of products, materials, etc. must be carried out in such a way that will ensure cleanliness in the jointly-used areas.
- 6.** No vehicles may be left on the roads and jointly-used areas of the TBP. Vehicles may be parked temporarily in accordance with the signs put up in the roads and other areas.
- 7.** Putting up traffic or information signs is permitted only on poles and supports specifically erected by the BPM.

CHAPTER IV

**CONDITIONS AND RESTRICTIONS FOR ENVIRONMENTAL PROTECTION PURPOSES,
CORPORATE SOCIAL RESPONSIBILITY, AND ADHERENCE TO SAFETY AND HEALTH
RULES**

The BPM recognizes that a significant factor for the long-term success of the TBP and the EUs is the ability to promote the interests of the society and establish dynamic relations with the local community, to handle responsibly complex environmental and social issues and to contribute towards the growth of the local and national economy. In the context of this understanding of Corporate Social Responsibility, the BPM will promote the use of socially responsible practices. The BPM will support the community of the EUs using creating methods for exchanging and disseminating best practices, initiatives and tools to be used by the businessmen, and will assist with the development of partnerships aimed at taking into account social and environmental concerns relating to the operation of their businesses and developing environmental innovation, with particular emphasis placed on green performance and energy savings.

ARTICLE 12

Conditions and restrictions for environmental protection purposes

Each EU must comply with the conditions laid down in the Decision on the Approval of Environmental Conditions in force each time for the TBP (JMD Φ/A.6/1/30827/2733/2007 [Government Gazette, Series II, No 1223/3-7-2007] is currently in force), its own environmental conditions and the national legislation in force concerning organized host areas for industrial plants (Law 3982/2011 is currently in force).

If the conditions laid down in the JMD, as currently in force, are infringed, the BPM must take all appropriate measures, including the right to lodge an appeal before any competent department or authority against the operation of the offender-EU.

The BPM will fulfill its obligation to prepare a Special Environmental Management Regulation, which will set out, among other things, general obligations for each established undertaking or any plant to be established in the TBP. The Special Environmental Management Regulation may be certified as an Environmental Management System by a duly authorized certification organization operating lawfully in Greece.

ARTICLE 13

Corporate Social Responsibility

Corporate Social Responsibility (CSR) means the actions taken by undertakings aiming to contribute towards dealing with environmental and social issues.

More specifically, undertakings are entities inseparably linked to the community in which they are carrying out their activities, thus affecting and being affected by the conditions prevailing at the time and in the area of their activity.

They must, therefore, assume their relevant responsibility to the society and the environment. That is, they must respect our key cultural principles and values, and in particular:

- respect for the human being, human dignity and provision of equal opportunities;
- respect for the environment, which is our heritage;
- improvement of living standards and quality of life.

Social Corporate Responsibility is important, as it reflects the fundamental values of the society in which we want to live and lays a foundation for future generations to live in a world that respects human beings and the environment.

In view of the above, both the BPM and the EUs of the TBP are bound to apply Social Corporate Responsibility principles as best they can.

ARTICLE 14

Obligations to adhere to safety and health rules in project worksites for BPMs and EUs

The obligations to adhere to safety and health rules in project worksites for the BPMs and EUs clearly specify all the duties and responsibilities of the contractors and construction companies as regards worksite health and safety matters. The relevant article is an integral part of this Operating Regulation.

1. General

The works carried out by the EUs in the TBP may include the erection of buildings, execution of electromechanical works, installation of equipment, formation of surroundings, special transfer/modernization works, etc. While each type of work is carried out, care must be taken not only to comply with the provisions laid down in the health and safety legislation for the private areas in which the works are carried out, but also to take into account the situation in adjacent properties. The smooth operation of a neighboring EU should not be prevented under any circumstances, and all necessary safety measures must be implemented in accordance with the type and location of the neighboring EU's facilities.

The EUs must see to it that the contracts concluded for awarding a project to construction companies clearly lay down all the obligations and responsibilities of both parties as regards occupational health and safety.

The “EU Project Contractor” must, during construction of the project, implement all necessary health and safety measures, as required by the legislation in force and must also be aware and apply all the procedures provided for by the BPM and this Regulation. It must also adhere to all the legal provisions on health and safety matters and all the BPM’s internal procedures adopted during construction of the project.

The “EU Project Contractor” must comply with any instructions given by the BPM’s representatives concerning health and safety matters. The “EU Project Contractor” must, at its own cost, take such health and safety measures as required each time to prevent any accident or dangerous incident during execution of the works. The project awarding contract must state explicitly that the Project Contractor will be responsible and bear all civil and criminal liability for any incident that may occur due to its own fault or due to the fault of its agents, or as may be caused by the tools and machinery used for the construction of the Project, or by third parties, e.g. subcontractors, visitors.

Without prejudice to the BPM’s rights, the “EU Project Contractor” has the right, as well as the obligation (following formal consultation with the BPM’s competent bodies), to forbid access to the work areas for any person who is not duly authorized to be present in the Project worksites. In that case the Contractor must notify immediately to the BPM’s Administration the visit of any person who has not obtained authorization from the BPM.

The “EU Project Contractor” must secure and guard all work areas, warehouses, etc.

It will be responsible for taking all necessary health and safety measures both for its own staff and the EU, BPM and third parties’ representatives, to prevent accidents and/or losses that may be caused by the works carried out.

The “EU Project Contractor” will be responsible for the supply, construction, maintenance and operation of all worksite lighting, fencing, security, safety equipment, sanitary area and other installations, as may be required to ensure the proper and safe execution of works or as may be reasonably requested by the BPM’s representatives for safety purposes.

The “EU Project Contractor” and the EU must propose safety measures to be implemented for the neighboring properties, to avoid affecting their smooth functioning or posing any risk. The BPM will examine the proposal submitted and will, after approval is given, communicate it to the adjacent EUs. Each interested EU may request all information concerning a neighboring worksite, as included in the BPM’s files.

If, during execution of the works, emergency measures need to be implemented to prevent an accident or leak or destruction, or to ensure safety and restoration after such an incident, the “EU Project Contractor” will be responsible for taking all necessary actions. The above obligation of the Project Contractor will not prejudice the BPM’s right to give orders/instructions on how to carry out the necessary works, or to block access to the TBP worksites for any staff members, visitors, machinery, etc. that do not comply with the provisions hereof and of the legislation in force each time.

2. Obligations relating to the EU Project Contractors' Health and Safety Organization or the BPM's Maintenance Works

The "EU Project Contractor" must, according to Presidential Decree 305/1996, prepare a Health and Safety Plan (HSP) and a Health and Safety File (HSF).

Even if there are no HSP and HSF included in the final design, either because the final design was prepared by a different body or because it was prepared by the EU itself, the construction Contractor will be the sole party responsible for preparing the HSP and HSF during the construction phase, taking into account the information provided in the final design.

The project HSP and HSF should be kept in the worksite, to be made available to the audit authorities (e.g. Hellenic Labor Inspectorate) and the BPM's representatives.

The HSP will be updated by the Contractor whenever this is deemed necessary in accordance with the progress of the works, to make sure that it is kept up-to-date throughout construction of the project.

Generally, the BPM may verify the Contractor's safety measures, in particular where adjacent areas might be affected, including the HSP and HSF and may request the taking of additional or alternative measures, at discretion. The above will apply without prejudice to the "employer's responsibility" principle, which is as follows according to Circular No 130297/15-7-96 and Presidential Decree 17/1996: "The employer shall be responsible for the safety and health of its employees and shall not be relieved of such responsibility even if the employees fail to fulfill their obligations or if the employer has assigned protection and occupational risk prevention duties to a Safety Engineer and/or an Occupational Physician or to competent External Protection and Prevention Service Providers.

3. Safety Management System for EU worksites

The "EU Project Contractor" appointed by each EU must develop a Safety Management System (SMS) providing for administrative actions to be taken for the implementation of the project, taking into account all other activities carried out in the TBP.

The minimum requirements/sections which must be covered by the Safety Management System include the Contracting Company's Safety Policy Declaration, which must be drawn up specifically for the project concerned. The Safety Policy Declaration will set out goals and commitments made by the Contractor as regards health and safety matters and will take into account any neighboring worksites or operating facilities.

It must also describe the Health and Safety duties of the Worksite Superintendent, the project Engineers, the Health and Safety Coordinator, the Safety Engineer and the Occupational Physician, and the relevant names must be notified to the BPM.

4. Health and Safety File for the construction an EU's project

The HSF should include the project register (i.e. its drawings and technical description), as well as instructions and useful information on safety matters, as need to be taken into account while carrying out any subsequent works throughout the construction of the project (e.g. maintenance, conversion, cleaning, etc. works) and should aim to prevent risks during the execution of such works.

5. Health and Safety Organization for Contractors implementing EUs' projects

The organization relates to the staffing and specific procedures. Based on the legislation in force, the Contractor implementing an EU's project must make the following appointments for the project:

- Safety Engineer;
- Health and Safety Coordinator during preparation of the project design;
- Health and Safety Coordinator during construction of the project;
- Occupational Physician, if so required by law (e.g. if there are more than 50 persons employed, if hazardous materials are used for the project, etc.).

The above persons must provide advisory services and will report to the Worksite Superintendent. The qualifications, duties and obligations of the Safety Engineer, Occupational Physician and Health and Safety Coordinator are detailed in the legislation. The Contractor must notify the appointment of the above persons to the competent Labor Directorate, as per the legislation, and to the BPM's representatives.

6. Duties of the Health and Safety Officers of the BPM and of the EUs' projects and facilities:

- To organize the Health and Safety (H&S) procedures, in accordance with the projects needs and the legal provisions.
- To take all required H&S measures that might affect adjacent EUs.
- To organize inspections/audits at the work fronts, with a view to enforcing and retaining the safety procedures and measures.
- To set out the types and technical specifications for the Personal Protective Equipment (PPE) to be provided/used in each case, before the works are started.
- To make sure that each employee is provided with and uses appropriate PPE.
- To keep a file of and notify to the Competent Authorities (as appropriate) and the Supervisors information on the accidents, near-misses and other dangerous incidents that may have occurred during the execution of works.
- To coordinate the training of employees on H&S issues.
- To coordinate third parties entering the worksite (e.g. subcontractors, visitors).

7. Obligations of the “EU Project Coordinator” concerning the construction, remodeling and addition of buildings, electromechanical installations, special works, etc.

The Contractor must keep the following:

7.1. A Safety Measures Logbook (SML).

The SML will be provided by the competent authority (Hellenic Labor Inspectorate), and the Contractor will see to it that it is kept at the project site, is available to anybody having a legitimate interest and any audit authority (Hellenic Labor Inspectorate, Project Owner, etc.). The SML should be kept up-to-date by the project Contractor’s staff members who are duly authorized and approved by the EU and the competent bodies of audit authorities.

7.2. Accident Logbook and List

The Contractor must keep an Accident Logbook for recording all the accidents that may occur at the project, along with the causes and a description of each accident. The Logbook must be made available to any audit/competent authority.

7.3. Staff Training/Information

The Safety Engineer must see to it that training programs are prepared and implemented for all employees concerning health and safety and the prevention of accidents and losses. The staff hired must be trained before being appointed to carry out their duties, to prevent any actions that might pose risks to themselves and third persons.

7.4. Safety Engineer and Occupational Physician Recommendations Logbook

The Recommendations Logbook must be ratified by the competent authority (the competent Occupational Risk Prevention Center). It will be used to record the written recommendations from the Contractor’s Safety Engineer and Occupational Physician. The Contractor must prepare an Emergency Plan / Escape and Rescue Plan for the workplaces, which must be put up at suitable locations at the workplaces and must be tested regularly by conducting drills, to make sure that the employees are able to find the emergency exits and rescue themselves in case of risk or destruction. The Contractor must also keep a Visitors’ Logbook, to record the details of each visitor, as well as the time of his/her entry to and exit from the project.

7.5. First Aid and Sanitary Facilities in the EUs’ worksites

The Contractor must see to it that:

- There are a sufficient number of first aid kits in the worksite area.
- There are trained persons capable of providing first aid in emergencies. The details of the above persons must be made known to all worksite staff.

- There is an Occupational Physician, if so required by law (e.g. if there are more than 50 persons employed on average, if there are underground works carried out, if hazardous materials are used, etc.).
- There is a properly equipped Infirmary, if so required by law.
- Employees are provided with drinking water.

7.6. Fire safety for the EUs' projects

To prevent and fight fires in the worksites, the Fire Department's Fire Safety Regulations must be complied with.

Following are some of the matters that need to be taken care of by the Contractor:

- A suitable and adequate fire-fighting system must be installed and maintained both in the office area and at the worksites.
- All fire extinguishers must be subject to maintenance procedures, in accordance with the manufacturer's instructions, and must be checked regularly.
- Fire safety must be ensured and the employees must be provided with relevant training.
- A trained team must be set up to deal with emergencies.
- Smoking must be strictly banned in hazardous areas.

7.7. Hazardous materials - Storage and use in the EUs' worksites

The Contractor must see to it that:

- A file of Product Safety Sheets must be kept for each hazardous material used at the project (e.g. chemical concrete admixtures, solvents, etc.).
- All safeguards are used when the above materials are transported, used and stored (in accordance with the instructions contained in the Product Safety Sheet).
- There is suitable labeling (in Greek) on containers with hazardous materials used in the worksite area. Where a large number of the employees are foreign nationals, it is desirable to have the above labeling printed in their language too.
- Where, during the execution of a work, asbestos-containing materials are used, the relevant legal provisions must be complied with.

7.8. Worksite electrical installations for the EUs' projects

All worksite electrical installations in general must comply with the provisions of the Indoor Electrical Installations Regulation in force. The same applies to (portable and fixed) power appliances and machinery used in the worksite (Presidential Decree 1073/1981).

7.9. Using machinery and tools for the EUs' projects

All project machinery and tools used for the project must bear the "CE" mark and must comply with the applicable legal requirements. More specifically: Any project machine and tool must be used for its intended purpose.

- Machinery must be used by licensed operators, or by assistant operators only in the presence of the licensed operator.
- Before any project tool, appliance or machine is switched on, care must have been taken to ensure that no persons are put at risk by its use.
- During the use of machinery, particular care must be taken where underground and aboveground PUO networks are installed. If infringements are identified relating to the implementation of appropriate safety measures by the Supervisors, the Contractor must put up specific compliance signs.
- Project machinery must be fitted with a back-up beeper, and a revolving warning light must be constantly on during movement thereof.
- The Contractor must see to it that the subcontractors' project vehicles and machinery also conform to legal requirements.
- The traffic of crawler project machinery in the TBP road network and the jointly-used areas is strictly forbidden.
- The parking of project machinery, trucks and passenger cars used by the worksite staff or visitors on the TBP roads is forbidden. These will park only in specifically designed areas in the worksites.

7.10. Emergency - EP

The Contractor responsible for the implementation of an EU's project will be responsible for applying an Emergency Plan (EP) in the worksite, in particular where underground works are carried out as part of the project. The EP must specify any possible emergencies, the equipment/methods/procedures used to deal with them, the contact persons in case of emergency and the telephone numbers to be used to contact the competent officials both inside and outside the worksite (Hospitals, Police, etc.).

The EP must be notified to all staff. Alert drills must be conducted for the staff of the contractor implementing the BPM's project and of the adjacent facilities, in cooperation with their Management, provided that there is a specific plan in place to ensure immediate protection in case of risk.

7.11. Hot work operations carried out the employees at the EUs' projects

Hot work operation means any work that involves the use of flame or generates heat or sparks (e.g. welding, gas welding, cutting, grinding). The Contractor must see to it that:

- The above works are carried out by licensed welders.

- Gas cylinders are stored safely (in an upright position, secured with a belt, protected from the sunlight/heat, separated per type as well as per filled and empty cylinders, in well-ventilated areas, etc.).
- Gas cylinders must be accompanied by a certificate of proper operation issued by the supplier.

7.12. Personal Protective Equipment at the EUs' worksites

The Contractor must provide its staff, the BPM's staff and visitors with such Personal Protective Equipment (PPE) as required each time, e.g. hard hats, safety boots, gloves for protection from mechanical, chemical, thermal or electric risks, ordinary masks or masks fitted with a filter for protection from dust, smoke, hazardous gases, ear plugs or ear muffs, reflective vests, etc.

The Contractor must provide visitors with the necessary PPE, inform them of the safety rules and systems applied/used in the workplaces and have them escorted during the visit. The BPM may prevent any employee or visitor who is not using PPE from entering in the TBP or may have him/her removed therefrom.

CHAPTER V
MANAGEMENT AND ADMINISTRATION OF THE THESSALONIKI BUSINESS PARK -
SERVICES PROVIDED AND FINANCIAL OBLIGATIONS

ARTICLE 15
Business Park Manager

1. The Management and Administration of the TBP includes all actions aiming to achieve its objective, ensure the smooth operation of the Park, utilize the jointly-used areas and facilities, take initiatives for improving and developing their infrastructures, developing new support services and initiatives, as well as ensure more effective environmental protection from the manufacturing activities to be carried out therein, as well as create and manage a special reserve for covering TBP improvement and upgrade expenses. The Management and Administration of the TBP will be carried out by the BPM in accordance with the legislation in force, this Regulation and its Statutes.
2. All land owners in the TBP must have a holding in the BPM's share capital. The land owners who lease out a plot or building for not less than fifteen (15) years may also transfer to the lessee their right to have a holding in the BPM's share capital for as long as the lease agreement is in force. If the lease agreement expires earlier, the lessee will lose the right to have a holding in the BPM's share capital, which will devolve on the owners on an ipso jure basis.
3. The BPM will inform the land owners of when they must acquire a holding in the BPM's share capital. The BPM and its departments will have their headquarters in the TBP Administration Center (AC), and its initial share capital will be the minimum required by law. The sum to be contributed by each land owner will be proportionate to the land owned, to cover the relevant shares. Said sum will be deposited to a dedicated bank account in the name of the BPM after the Establishment Agreement is signed. The TBP land owners will retain their holdings in the BPM's share capital for as long as own that land. In the event of change of owner and/or termination of a long-term lease agreement, the BPM shares must be transferred to the owner.
4. The BPM will be governed by its Board of Directors (BoD). The BoD of the BPM will comprise 11 members, possibly including a representative of the local Municipality to be appointed by decision of the Municipal Council after a written request is sent to the Municipality for this purpose three (3) months prior to the anticipated date of election of the new BoD members. If there is change of Municipal Authority, the Municipality's representative may be replaced within three (3) months of the date of assumption of duty by the new Municipal Authority. Up to two (2) persons of recognized status from various bodies, authorities and/or agencies (e.g. Chambers, Universities, etc.) may also be elected as BoD members. The BoD members who are employed by the BPM, the EUs or companies providing services to the TBP will receive no remuneration. The remuneration paid to the salaried BoD members will be specified for each meeting, but will under no circumstances exceed, for each month and irrespective of the number of meetings held, the

basic salary specified in the current National Collective Bargaining Agreement for persons employed by technical undertakings as Licensed Engineers holding a University degree and having ten years of experience.

5. The decisions of the BPM's BoD will be binding on all TBP owners and users irrespective of whether they have a holding in the BPM Company or not, or whether they have agreed with the decision concerned or not. The BoD decisions will be notified in writing to all the EUs within fifteen (15) days of adoption of each BoD decision.

6. By decision of its BoD, the BPM will decide on how to use the special reserve for making improvements to the jointly-used areas and facilities and for procuring and modernizing the Administration Center equipment and services. On an extraordinary basis and provided that the reserve is more than sufficient to make any possible improvements to the jointly-used areas and facilities, the BPM's BoD may decide to use the surplus amount to cover current costs and expenses.

7. The BPM will be supervised by the Ministry of Development, Competitiveness, Infrastructure, Transport And Networks, or as specified by the legislation in force each time.

ARTICLE 16

Business Park Manager's duties and obligations

1. The Business Park Manager's duties and obligations include primarily the following:

1.1. Ensuring in all respects the smooth functioning of the TBP and of the services rendered to the EUs.

1.2. Making decisions, pursuant to Article 3 hereof, while considering and accepting/rejecting expressions of interest submitted by various undertakings wishing to get established in or transferred to the TBP.

1.3. To consent to a change to the production activity of an EU, pursuant to Article 4 hereof.

1.4. To consent to the design relating to the disposal of liquid waste (sewage) by the EUs, pursuant to Article 8(6) hereof.

1.5. To operate, maintain and restore failures in the jointly-used and jointly-owned facilities, the road network, the water supply, electricity, telecommunications, stormwater drainage and sewerage networks, provided that no different provision has been made concerning some of them in the contracts entered into with the relevant organizations or service providers.

1.6. To outsource or prepare designs and drawings for improving the functionality of the TBP, e.g. traffic arrangement design, emergency plan study, energy savings study, etc.

1.7. To hire and pay the necessary workers and technicians, as well as the necessary scientists and administrative staff, consultants, etc., based on employment relations of any form and duration and based on a work contract or a contract for the provision of independent services.

- 1.8.** To ensure the security of the TBP either by organizing and operating a dedicated department for this purpose, or by outsourcing the security duties to a private company, or by using any other appropriate method.
- 1.9.** To have the municipal waste removed from the TBP.
- 1.10.** To see to it that the jointly-used areas of the TBP are kept clean, well-lit and tidy.
- 1.11.** To take and enforce environmental protection measures.
- 1.12.** To regulate the traffic of vehicles and pedestrians in the TBP roads, to put up the relevant signs, to specify the vehicle parking lots and to address any traffic problems, upon authorization from the competent authorities.
- 1.13.** To approve or amend the traffic arrangement designs at the request of the EUs, aiming to put in place a temporary or more permanent traffic arrangement from and to their respective properties or in the wider region during the construction period.
- 1.14.** To specify, at the request of any party concerned, the location and conditions for putting up advertising signs in the jointly-used of the TBP.
- 1.15.** To exploit the jointly-used facilities, with the possibility of promoting third undertakings.
- 1.16.** To specify the location and method of promotion of the EUs, pursuant to Article 8 hereof, as well as to suspend the authorization granted for promoting them.
- 1.17.** The beautification, planting and maintenance of green areas in the jointly-used areas of the TBP.
- 1.18.** To audit and approve each joint expense according to the procedures to be specified in each case, to allocate the expenses to the different plot owners or users in the TBP, as well as to secure, using all lawful means, collection of the relevant sums of money pursuant to Articles 18 and 19 below.
- 1.19.** To sign the Establishment Agreements as a third contracting party concerning the BPM's rights and obligations hereunder.
- 1.20.** To take ordinary and extraordinary measurements to verify compliance with the environmental conditions that govern the operation of each EU and of the TBP in its entirety.
- 1.21.** Where biomass is used as fuel, the BPM will be entitled to conduct sampling checks to verify that the fuel used is biodegradable, and the EUs will be under obligation to provide the BPM with all necessary assistance and facilities.
- 1.22.** To see to it that the jointly-used areas and facilities are protected, to lodge lawsuits, complaints or any other appeals before the Competent Authorities against any owner or third party for any unlawful act that comes to its knowledge.
- 1.23.** To force an EU found to have infringed the conditions hereof to take the necessary measures to lift or prevent these infringements, as provided for in the previous articles.
- 1.24.** To notify/report to the competent authorities any infringement committed by the EUS and take all necessary measures for remedying said infringement, as provided for in the previous articles.

1.25. To ban any actions on the part of the EUs or third parties and to lift any omissions on their part which might cause disturbance, risk, damage or loss to persons or things, resulting primarily from the defective operation of the facilities and from failure of the undertakings to take appropriate measures for preventing the risk or disturbance concerned.

1.26. To negotiate and enter into agreements for the provision of services by the local Municipality, in exchange for payment of the corresponding municipal fees.

1.27. The BPM may authorize persons to provide all or part of the above services, aiming to ensure the interests of the EUs.

2. The EUs will have to accept the services provided as per the above and pay to the BPM the corresponding joint expenses, as allocated by the latter with a view to covering the costs incurred for rendering its services.

3. The BPM will regulate on a case-by-case basis the operating procedures for the railway loading/unloading operations, aiming to ensure the provision of the best possible services to the EUs and in accordance with such utilization of the network as approved by the Hellenic Railway Organization (OSE), which has the power to approve the relevant procedures and permits or not.

4. The BPM may also organize and offer to the EUs, in addition to the above “mandatory services”, optional “value added services”, to utilize the economy of scale created by the concentration of EUs in the TBP to the benefit of these EUs. These services may include, but not be limited to, transportation services (railway services, staff transportation, etc.), shuttle and connecting services to transport hubs (e.g. ports, airports, etc.), programming contracts and coordination of the services needed by the EUs at their facilities, such as technical support and preventive maintenance, cleaning and sanitary services, industrial waste collection and removal services, recycling, disinfection and disinsectisation services, gardening, security, energy resources management, consumable supply services, etc. The services provided may also include making available specialized personnel, such as an occupational physician, a safety engineer, specialized technicians, quality assurance officers, etc. Finally, the AC may be used to organize jointly-used support services, such as reception and control, acceptance and forwarding of mail, telecommunication services, printing services, catering services, etc. The BPM may negotiate the provision of services for all or some of the EUs, to secure the best financial offer as well as the best possible quality of service, following a relevant agreement reached with each EU.

5. The BPM’s responsibilities also include adopting and applying highly credible and transparent procedures and actions, irrespective of whether services are provided by its own staff or through partnerships established with third parties. As regards each procedure, the provision of quality services must be ensured in conjunction with the optimal financial solution. These procedures pertain to the award of projects relating to maintenance, failure restoration,

modernization, designs/studies, recruitment, supply of materials, spare parts, equipment, etc. All procedures must be approved by the BPM's BoD.

ARTICLE 17

Fiscal year

1. The BPM's fiscal year will last for twelve months, from 1 January to 31 December each year. Exceptionally, the first fiscal year will begin as of the date of publication of the Statutes in the Series for Sociétés Anonymes and Limited Liability Companies of the Government Gazette and will expire on 31 December of the following year.
2. The BPM must appoint an Internal Auditor to evaluate and record the internal procedures in practice, identify weaknesses and derogations in the system and give advice and recommend adjustments.

ARTICLE 18

Insurance of facilities, buildings and jointly-used areas

Obtaining insurance against the risk of fire, flood, explosion, etc. for the building facilities in the TBP is mandatory. The relevant cost will be borne by the owners and/or lessees of the relevant facilities. The compensation for damages suffered by a building facility will be used to restore the damage and ensure the smooth operation of the EU. In the event of total destruction, the user will have to complete the reconstruction works within three (3) years, pursuant to Article 6(2), subject to the obligations under Articles 2, 3, 4, 5 and 6. Should there be an impending change of activity and/or of the establishment conditions, the procedure contemplated in Articles 3, 4 and 5 must be repeated as regards approving the changes that are subject to consent from the BPM.

The insurance coverage obtained to cover the possible risks that an undertaking may have to face will be considered sufficient if the protection ensured enables the undertaking to continue its activity in the event of occurrence of the insured risk. The criterion used to verify the adequacy of the insurance will be the ability to cover the damages listed below, with reference to values that reflect the actual cost of erection of each EU's building facilities. There must be covered damages resulting from the following causes: Fire, direct lightning, smoke, extensive explosion, short-circuiting followed by fire, terrorist acts, insurrection, strike, uproar, political upheaval, malicious damage, aircraft crash or objects falling therefrom, third party vehicle collision, flood, tempest, storm, tornado, geological phenomena, subsidence, snow, hail, frost, breakage, water supply, heating, cooling, fire-fighting pipe leak, civil liability, debris removal and clearing costs, earthquake and/or fire caused by an earthquake.

All Risks Insurance for worksites As regards insurance coverage during construction, remodeling, modernization and other works, a similar sufficient insurance policy must be in place to provide all risks coverage for civil engineering, erection/assembly works relating to material damage and civil liability, covering all possible risks with objectively sufficient coverage limits.

If the property owners or lessees fail to submit an insurance policy, the BPM is hereby authorized by said property owners or lessees to take all lawful actions to revoke the building permit on grounds that obtaining sufficient insurance for the worksites is a necessary prerequisite for the execution of works. The BPM will be under obligation to obtain insurance coverage for the jointly-used areas and facilities.

ARTICLE 19

Administrative structure of the Business Park Manager

1. The administrative structure and staffing of the BPM will be determined in accordance with the needs of the TBP. The BPM will be governed by its Board of Directors, which will specify the structure of its various departments, including its administrative, financial and technical departments.
2. In any event, the BPM, or any service providers duly authorized by the BPM, will represent the BPM in its relations with third parties, will verify that the TBP operates smoothly and all obligated parties comply with and apply the provisions hereof accurately, will identify any infringements, will pursue the necessary procedures or impose sanctions, and will also take all kinds of measures as necessary to ensure the organization and smooth operation of the TBP.
3. To ensure the rational organization and operation of the TBP, the BPM may set up, as appropriate, advisory and/or executive committees to promote the operation, control and development of the TBP. The makeup and operating method of these committees will be specified by decision of the BPM's BoD.
4. The BPM will function using the minimum number of staff required, who will have to coordinate, control and supervise own or third-party crews, subcontractors and each undertaking rendering permanent services based on a contract or extraordinary services to the TBP. The contractor appointed to render services or carry out works will be chosen in compliance with all the required selection and award procedures.
5. The Internal Audit will serve as a mechanism aiming to supervise the required procedures and apply corporate governance principles, thus contributing considerably to protecting the BPM and ensuring the interests of shareholders with a view to developing and establishing the BPM's culture among the TBP executives and users and to ensuring that the BPM adapts to the institutional framework in place each time. The Internal Audit will assure the BPM's BoD that all the required procedures are complied with. The audit will cover, in addition to the

accounting and financial functions, all other functions carried out by the BPM, as this affects all organizational activities.

6. Security Regulation for the TBP area and responsibility of the Security and Safety Service Provider

6.1. The BPM will provide security services for the TBP by entering into a partnership contract with a Security Provider to be selected on condition that it meets the quality criteria set by the BPM. The Security Provider will take note of the TBP's needs, will design and elaborate the security plan using the capabilities of the facilities and taking into account their requirements, and will render the above services using its own trained staff and suitably equipped vehicles.

The BPM's Security and Safety Department will be informed of the plan and verify that the Service Provider is capable of rendering reliable services. The Security Provider will be responsible for implementing the facilities security plan in the TBP and will, in particular, ensure the security/safety of the EUs, employees and visitors, as well as their properties in the TBP. However, it will survey only the perimeters of the privately-owned plots and the jointly-used and public areas and facilities. The Security Provider will, in cooperation with its Supervisors and Chief Guards, verify that its security measures are implemented effectively and that the Security Staff perform their duties properly, by conducting ordinary checks on its measures and procedures as well as inspections and unannounced visits at all guarded areas on a 24-hour basis. The ordinary and extraordinary check reports and the corrective or preventive actions will be recorded in a logbook, which will be made available to the BPM and the police.

6.2. The minimum security services to be rendered on a mandatory basis will include making available two (2) guards (per shift) and one patrol vehicle on a 24-hour basis. One guard will be posted at the central gate and the other will carry out checks on the outdoor areas, as these are to be specified in the Security Regulation. The security systems used, such as cameras, signal receiving center, patrols, control, etc., will be specified in the Security Regulation, along with all the security services to be provided, in addition to the minimum mandatory services, as determined by relevant optional consultation with all the EUs.

6.3. Support security services for the EUs The BPM will record each EU's requirements and will carry out an overall negotiation and reach an agreement with all EUs. Any such cost will be borne by the EUs provided that it relates to services rendered only inside the EUs' properties. The aim of the BPM will be to create an economy of scale as regards the cost of such services by securing the best possible aggregate offer and assuming the responsibility for carrying out central control of all guards with a view to ensuring the best possible control and coordination and, therefore, protection of the EUs.

6.4. The BPM's BoD will decide following relevant consultation with the EUs on further developing the safety and security procedures and technological systems for the jointly-used areas of the properties.

7. Facility maintenance, greenery, cleanliness, etc. services All the support services for the TBP will be rendered by organized crews consisting of BPM or third party (subcontractor) staff, in compliance with all required procedures, whereas the BPM will be responsible for the organization, supervision and control of such procedures.

8. Selection of Contractors The services rendered by providers of security, maintenance and support services in general for the operation of the TBP will be decided by the BPM's BoD. The contractors to provide the relevant services will be selected using clear and transparent tender procedures, with not less than three (3) bidders, and the evaluation and final selection will be done either by the BoD or by the TBP departments based on a relevant BoD decision, or by a certain committee, where such a committee needs to be set up. All tenders will be conducted on the basis of strict evaluation criteria for all bidders and will ensure the optimum results in terms of finances and quality.

ARTICLE 20

Decisions of the Business Park Manager

1. The decisions made by the BPM's bodies on matters falling within their scope of responsibility will be binding on all TBP plot owners and users, the latter having to comply with such decisions, irrespective of whether they are BPM shareholders or not.

2. The BPM's decisions will be communicated in writing to all TBP plot owners and users within fifteen (15) days.

ARTICLE 21

Joint expenses (allocation and collection)

1. "Joint expenses" means all kinds of costs incurred to ensure the smooth operation of the TBP and in particular those relating to the maintenance, functioning and utilization of the jointly-used areas, facilities and buildings and the provision of services and benefits to the EUs. These expenses include mainly the costs incurred to supply electricity to the jointly-used areas, to operate, maintain and repair the jointly-used facilities, and in particular the CWTD, to collect and remove the waste, to pay the BPM's staff, to provide security services for the TBP, etc., as well as all other joint expenses that are not explicitly referred to, which relate to keeping the TBP tidy, functional and secure. Such costs include staff fees, supply of materials, insurance contributions and all other relevant costs.

2. The amount of joint expenses will be determined and allocated to the TBP plot owners and users by the BPM on a quarterly basis. A relevant list will be made publicly available and communicated to the plot owners and users in writing. The EUs will be under obligation to fully pay the relevant sums owed within fifteen (15) days of receipt of such communications.

3. More specifically, the joint expenses will be allocated to the EUs on a pro rata basis, in accordance with the ratio of each undertaking's plot surface area to the total surface area of the TBP and/or in accordance with the level of use of a jointly-used service. The allocation of the expenses that are determined in proportion to the surface area of the plots, per group of properties making up a single building block, is shown in Table 1 below:

Table 1 - TBP property ratio

BUILDING BLOCK NO. - DISTURBANCE LEVEL	BUILDING BLOCK SURFACE AREA (sq.m.)	THOUSANDTHS OF THE TOTAL SURFACE AREA OF ALL PROPERTIES
1 – AC	8,613.31	12.42
2 – LD	8,390.69	12.10
3 – LD	37,979.55	54.76
4 – LD	32,998.63	47.58
5 – MD	209,467.27	302.04
7 – MD	37,272.61	53.74
8 – MD	20,277.97	29.24
9 – MD	38,838.68	56.00
10 – MD	37,447.15	54.00
11 – MD	144,434.32	208.27
12 – MD	117,792.01	169.85
TOTAL	693,512.19	1,000.00

4. The participation quotas will be further broken down into the individual properties in each building block, depending on the number of plots to be demarcated in the different building blocks. Each owner in the TBP will be directly responsible for paying all the expenses charged on its property in accordance herewith, irrespective of whether he uses the plot himself or has ceded it, regardless of the form of concession, to a third legal or natural person, the latter being held severally and jointly liable with the owner.

5. In addition to the joint expenses that correspond to each EU, the latter must, as of execution of the Establishment Agreement, pay a one-off sum of money for creating a reserve

to be used as working capital and for dealing with emergencies. The reserve will amount to EUR 0.15 per square meter of the plot and will be adjusted in accordance with the consumer price index on 1 January of the following year. The relevant sum will be deposited to a dedicated account. The existing TBP plot owners who have made a contribution for the reserve on the basis of the previous Operating Regulation must adjust their contribution on the basis of this Operating Regulation by the date of commencement of operations of their undertakings.

6. A TBP plot owner and user will be severally and jointly obligated to pay the sum of money that corresponds to their property for the joint expenses, as well as the one-off sum of money for creating the reserve within fifteen (15) days of receipt of the relevant document. If that sum is paid after expiry of the above deadline, the BPM will be entitled to pursue collection of the sum using all legal means at its disposal in accordance with the law and this Operating Regulation, and at the same time to suspend temporarily, at discretion, the provision of services to the debtor.

7. The BPM will be responsible for determining the joint expenses, allocating them to the EUs and ensuring that the relevant sums of money are collected in due time by using all legal means at its disposal, possibly by suspending temporarily the provision of services to the debtor and the right to use the jointly-used facilities and infrastructures, e.g. water supply, waste disposal in the network and provision of public utility services. Concerning the above suspension, the BPM must send a relevant notice and set a deadline of ten (10) business days before the services are suspended. The EU will not have the right to pursue any legal action against the BPM.

8. The total sum of the expenses referred to in paragraph 1 of this Article will be estimated in advance in the first half of December by decision of the BPM's BoD, following a written recommendation from its competent department, and will constitute the approved budget for the following year's expenses.

9. No EU will have the right to refuse to pay these expenses due to any reason and cause whatsoever, given that each EU undertakes a relevant obligation on the basis hereof and by signing the Establishment Agreement. It should be noted that the bills issued by the BPM and their copies will constitute full proof of the sums owned by the EUs.

10. Any economic profit resulting from the utilization of jointly-used areas in the TBP will be spent on creating the special reserve, to further improve the infrastructures or as specified in Article 14(9).

11. The users of the areas included in Building Block No 1 (stores, offices, outdoor areas, etc.) will not participate in the joint expenses, which will actually constitute part of the concession, lease or other agreement, this being an incentive for attracting small-size undertakings or service providers, as described in Article 2(6), to provide services to the EU employees and the visitors to the TBP. The AC joint expenses, representing 12.42 thousandths according to the Table of Article 20(3) will be taken into account as individual expenses out of the total expenses.

12. The BPDC will have to pay no joint expenses for the plots it owns, which have not been sold yet, up until they are transferred to third parties, exclusive of the costs incurred for the provision of general security/safety, cleanliness, street lighting and administrative services.

ARTICLE 22

Allocation of expenses relating to various networks

1. Charges will be made on each EU for its property for connection to and use of the Public Utility Organization networks (electricity, telecommunications, etc.).
2. Water supply and drainage networks will be made available by the BPM to each EU in the TBP, and the cost for the water consumed by each EU will be determined on the basis of the water meter installed in each property. The unit price of the water consumed will be determined by allocating only the operating and maintenance costs of the water supply system (i.e. boreholes, pumping stations, water supply networks, etc.).
3. The cost of using the sewerage network and operating the sewage treatment plant, including the relevant direct maintenance and operating costs thereof, will also be determined in proportion to the quantity of water consumed by each EU, such consumption being defined as a contractual parameter used to determine the quantities of sewage channeled into the CWTDP. The BPM will be entitled to change the method used to determine the amounts of liquid waste channeled into the sewerage networks, if another more accurate method can be used.
4. As regards the EUs using steam, the annual quantity of water used to generate steam will be agreed upon following submission and approval of a relevant approximation study, to which the factory-defined technical specifications of the machinery used will be attached. The BPM must, within 10 days of submission thereof, request additional information or approve the study. If no relevant request is submitted or if the study is incomplete and up until the quantities of water used to generate steam are approved by the BPM, the total quantity of water consumed will be measured. Upon definitive determination of the quantity of water used to generate steam, this quantity will be deducted from the EU's total quantity of water already consumed. However, it will under no circumstances exceed 70% of the total quantity consumed.
5. Each EU will pay the contribution/fee required by law for the disposal of treated sewage and of the stormwater channeled into a nearby controlled trench, either directly to the Local Land Improvement Organization of Agios Athanasios, or through the BPM following allocation of the total relevant expenditure paid by the BPM for the TBP. In the event of connecting to the stormwater drainage and sewerage networks of the Thessaloniki Water Supply and Sewerage Company or other similar organizations in the future, the relevant cost will be paid to the Thessaloniki Water Supply and Sewerage Company or the other similar organizations instead of the Local Land Improvement Organization of Agios Athanasios for any services or benefits no

longer provided by the latter, also either directly by the EUs, or through the BPM following allocation of the total relevant expenditure paid by the BPM for the TBP.

The allocation of the contributions paid to the Local Land Improvement Organization of Agios Athanasios and other public utility or local government organizations providing services or benefits directly or indirectly to the EUs or the TBP, if these are not paid directly by each EU but are paid by the BPM, will be made to each EU using the same charging method, i.e. in accordance with the ratio of the plot surface area to the total surface area of all plots in the TBP.

CHAPTER VI
RAILWAY STATION

ARTICLE 23

General

In addition to the other infrastructures available at the TBP, there is also a railway line crossing the Park. By installing two additional parallel railway lines in the TBP, the standard Railway Station of the Park was formed.

To make sure that the railway station will function properly and without any hindrances, it will be governed by the provisions laid down herein. The applicable provisions of the Ministry of Transport relating to the operation of the railway network and the railway stations will supersede the provisions laid down herein. This chapter:

- sets out the operating framework of the railway station;
- specifies the types of rail cars to be used and the materials to be carried by each car;
- specifies the types of machinery required for carrying out product loading and unloading operations in the station;
- explains how to handle the goods concerned;
- specifies any safety issues relating to the protection of staff and goods;
- suggests maintenance methods for the facility, to keep it in good working order.

The railway station will be part of the TBP and will be included in its jointly-used areas. Its key mission is to provide the EUs with services in the TBP. However, services may be provided to any company, even those established outside the TBP, after a request is filed and the station officers are notified, in the context of a bilateral management agreement that must have been concluded by and between the party concerned and the BPM, always on condition that this will not prevent the services rendered by the railway station to the EUs operating in the TBP.

The relevant pricing policy will be determined by the BPM. The policy will, depending on the handling method, type and duration, specify the cost incurred for the EUs to receive railway station services and use the railway station. The cost incurred for undertakings established outside the TBP to receive railway station services and use the railway station may also be determined by bilateral agreements.

The railway station will be able to handle containers, large amounts of cargoes and goods on rail cars, whether arranged on pallets or not.

The railway station area is crossed by the Axios Connecting line, which is broken down into two auxiliary tracks, approximately 150m in length, in the Park. This allows for the simultaneous

loading/unloading of two trains - Point A in Figure 2. The trains may be loaded/unloaded onto/from a truck parked in the inner roads constructed next to the railway line – Points B in Figure 2. The area includes a storage lot where 36 40ft containers (12.19m x 2.44m) can be placed on the ground – Point C in Figure 2. The trucks will reach the unloading area via Aristotelous Avenue, i.e. the central road of the Park, and using a road that has been constructed – Point D in Figure 2.

The railway station will be capable of handling:

- (A) closed rail cars used to transport goods, whether arranged on pallets or not;
- (B) containers on rail cars;
- (C) goods which are cargo units in themselves, e.g. agricultural machinery.

ARTICLE 24

Services rendered, types of rail cars that can be used

Following are the services rendered using the railway station:

- (A) loading/unloading of cargoes arranged on pallets from a rail car to a truck;
- (B) loading/unloading of cargoes which are not arranged on pallets from a rail car;
- (C) loading/unloading of containers.

The railway station will not be capable of handling:

- hazardous cargoes e.g. explosives, toxic materials, chemicals, flammable materials, etc.);
- cargoes in bulk (except in exceptional cases, with consent from the BPM).

All the above must be transported on appropriate rail cars, as there is an appropriate type of rail car for each type of cargo. Table 2 below describes all types of rail cars. Only the first 3 of the 5 types of rail cars used to transport cargoes to the TBP railway station.

Table 2 Types of rail cars

Type of rail car	Type of products transported	Examples
Boxcar	Materials that need protection from the environment and/or vandalism or theft	paper, electronic equipment, hospital materials
Flatcar	Materials that do not need protection from the environment Additional materials that do not fit in another transportation vehicle	vehicles, bulky cargoes, containers
Gondola car	Materials that do not need protection from the environment The sides of the car will only prevent the products from moving	metal bars, scrap
Hopper car	Materials that may be blown away by the wind and need protection from the environment	gravel, coal, sand, wheat
Tank	Liquids in bulk	water, chemicals, beer

ARTICLE 25

Loading and unloading equipment and machinery

The TBP will not make available cargo handling machinery for the management of the station. The customers or the company responsible for the management of the railway station must have the required machinery at their disposal. The machinery required for these operations are:

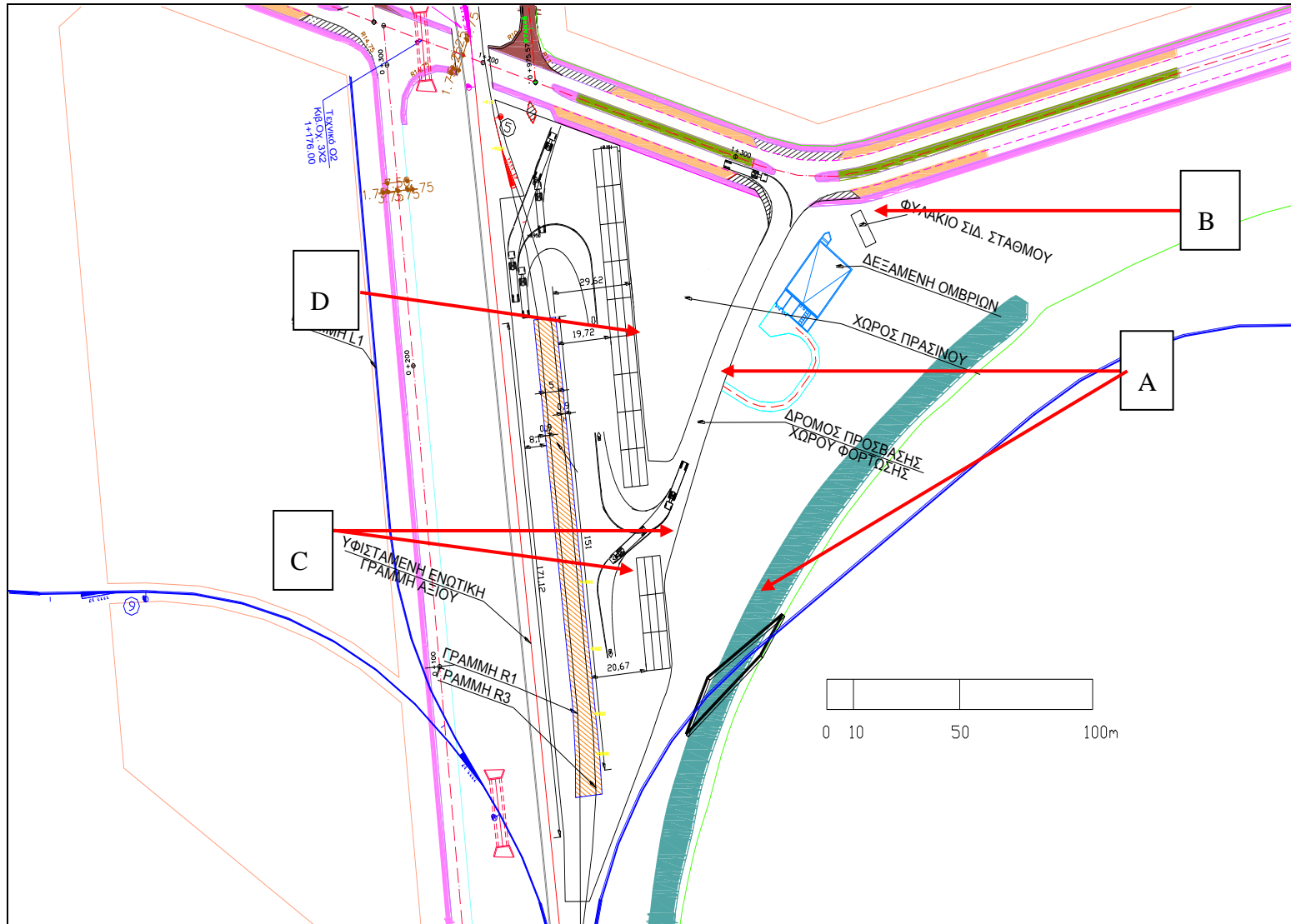


Figure 2 Plan view of the railway station

(A) Diesel (or gas) forklift

This type of machinery will be used for loading/unloading pallets onto/from the rail cars.

Table 3 Technical characteristics of diesel (or gas) forklifts

TECHNICAL CHARACTERISTICS		
1.	Forklift lifting capacity with a 600mm center of load at a height of 3000mm:	1500kg (min)
2.	Maximum height of forks:	3000mm (min)
3.	Extended mast height when the pallet is placed at a height of 3000	3900 (max)
4.	Side movement of forks, right - left	+/- 50mm (min)
5.	Working aisle with 1000 or 800mm deep pallets, i.e. with the pallet on (europallet, 800*1200mm, or industrial pallet 1000*1200mm):	3600mm (max)
6.	Lower mast height (minimum door clearance height):	2200mm (max)
7.	Maximum gradeability, with a 1500kg load:	8% (min)
8.	Forward or backward movement - rotation of mast or forks	2/5 degrees (max)
9.	Length of forks	1150mm

(B) Manual pallet lifts

This type of machinery will be used to move the pallets inside the rail cars and closed trucks. They will have a lifting capacity of 2000kg.

(C) Special container handler.

Technical information and specifications are provided in Table 4 below:

Table 4 Key characteristics of special container handlers

KEY CHARACTERISTICS	
1.	Working aisle: 15m (max)
2.	Maximum load handled: 42tn
3.	Maximum gradeability, with a 42tn load: 8% (min)
4.	Stacking height: 5 containers
5.	The containers will be handled from their upper part (with special lifting grabs)
6.	The machinery will be used to stack empty and laden containers
7.	The machinery will be used to unload and load containers from/onto trains

ARTICLE 26

Work scheduling and “customer time” allocation procedure

Due to the special handling of trains, the parties interested in using the Railway Station must follow a strictly specified procedure, to ensure that the station runs smoothly.

Firstly, the interested party must notify the railway station operating center, specifying:

1. The train arrival time

2. The type of rail car
3. The type of goods
4. The quantities involved
5. The station usage time
6. A request for placing the goods in the asphalt-coated area for a specific period of time, if it is impossible to load the goods onto a truck immediately.
7. A commitment that the machinery and staff required for loading/unloading will be made available.
8. A commitment that the number of trucks required for loading will be dispatched within such specific period of time as designated in accordance with the discretion granted.

Then, after the interested parties obtain approval from the Station, they must see to it that the train is dispatched, to arrive on the agreed time. They must provide in time the machinery required to carry out the works, as well as the staff and vehicles needed. The scheduling aims to book specific periods of time for each customer.

ARTICLE 27

Cargo handling method

27.1 ENTRY-EXIT OF TRUCKS

Given the layout of the area, the railway station area has one common point of entry and exit for trucks. The facility officers must manage the trucks in an orderly and smooth manner, to prevent traffic problems caused by trucks trying to enter and others trying to exit the station. The access road is wide enough, approximately 7.5m, for the trucks entering the station to wait until they are allowed to move on. There is an area where parking is permitted on the central road too (Aristotelous Avenue), before the entrance to the railway station, at the road side. As regards longer waiting times, there is also a dedicated truck park in the TBP (Figure 3).

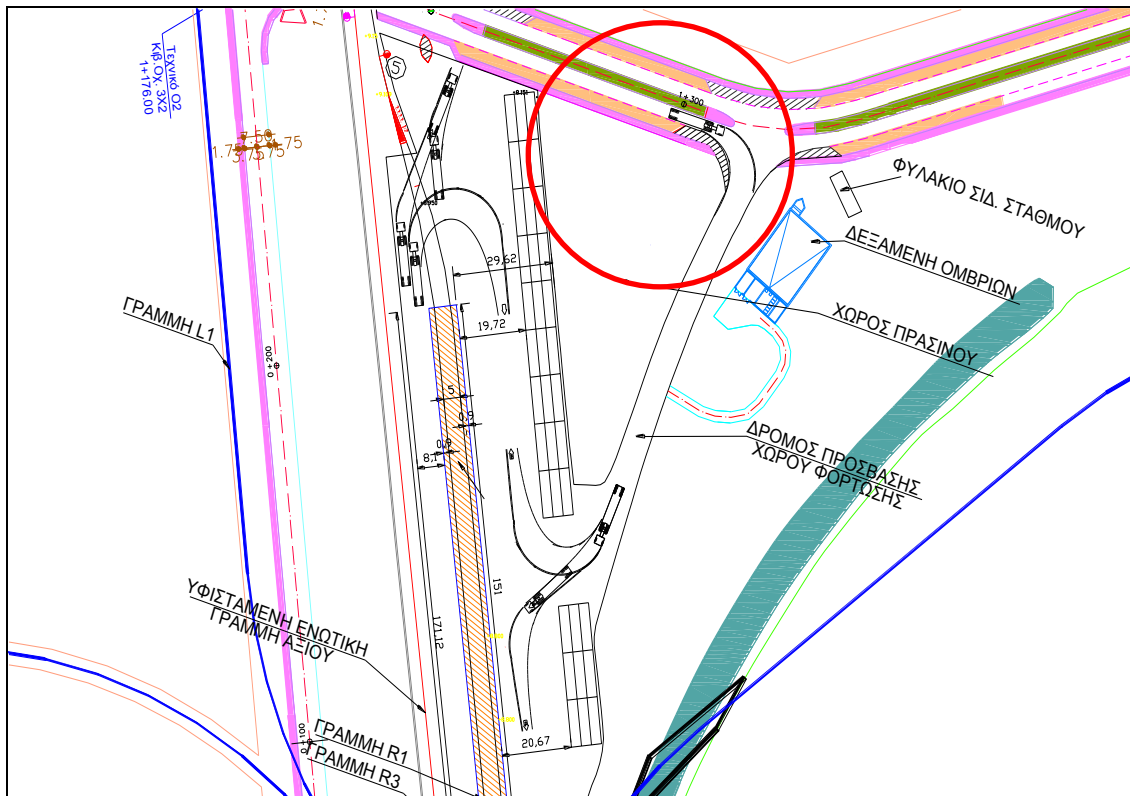


Figure 3 Entry-exit of trucks to/from the railway station

27.2 HANDLING CONTAINERS

27.2.1 To ensure that the Station functions better, when there are two trains in the station, the one carrying containers must, if at all possible, be on the container stacking side, whereas trains with closed cars must park on the other side.

The main reason for this is that the container handler needs a minimum maneuvering space. The space needed for the handler to make a complete turning circle is 15m. The free space in the railway station between the dedicated container stacking area and the train is approximately 19m. This allows for using the handler and having a truck temporarily parked, to load the container onto the truck trailer or unload it therefrom.

27.2.2 Management of the container stacking area:

1. Three (3) containers will be placed one behind the other, and the rest will be stacked one on top of the other, depending on the needs and their weight. Figure 4 below shows how to handle the containers using the handler. The handler will load and unload containers from two rail cars and will then place them at their appropriate locations. It will also be possible to rotate the containers if the space available is limited.

2. The key idea concerning the loading/unloading of containers is to use 9 container locations per customer, which means 3 rows with 3 containers each.

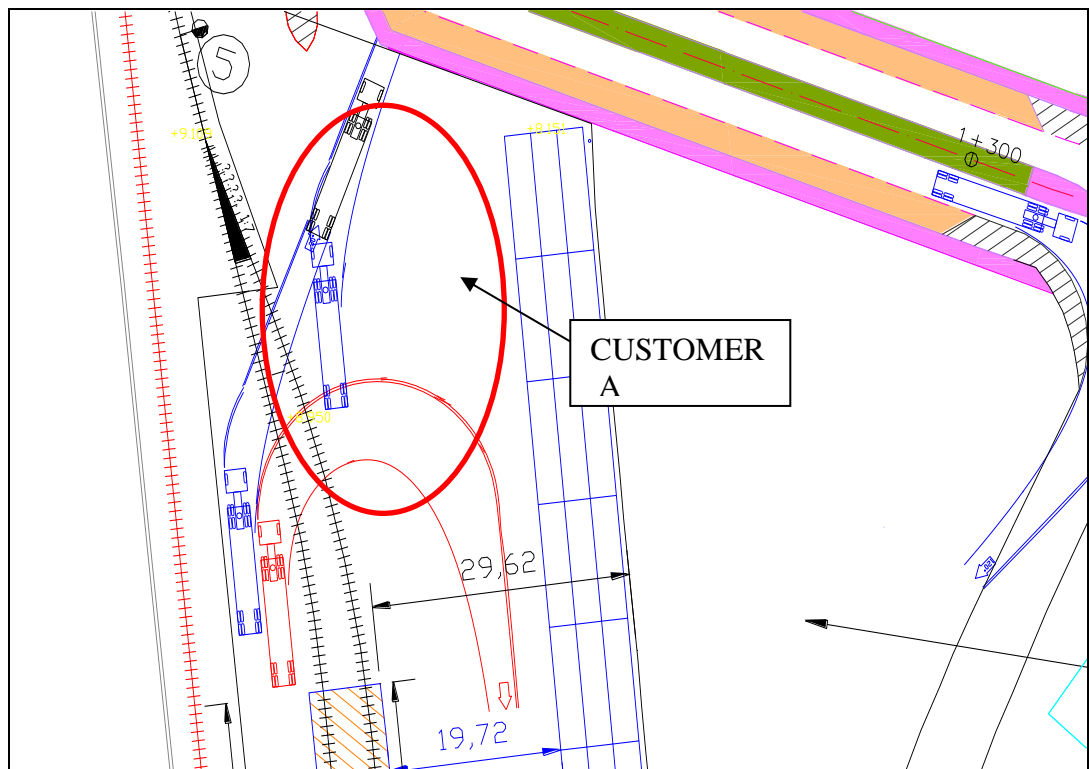


Figure 4 Container placement per customer

It is possible to place 3 containers, one behind the other, in each space.

Furthermore, two auxiliary lines have been drawn in front of the storage area, to demarcate the area and help the forklifts during placement.

In emergencies or in the case of “small-size customers” as regards the number of containers handled, it is possible to define a row consisting of 3 containers relating to one (1) particular customer. Another row may be defined for another customer, etc. Figure 5 below shows an example.

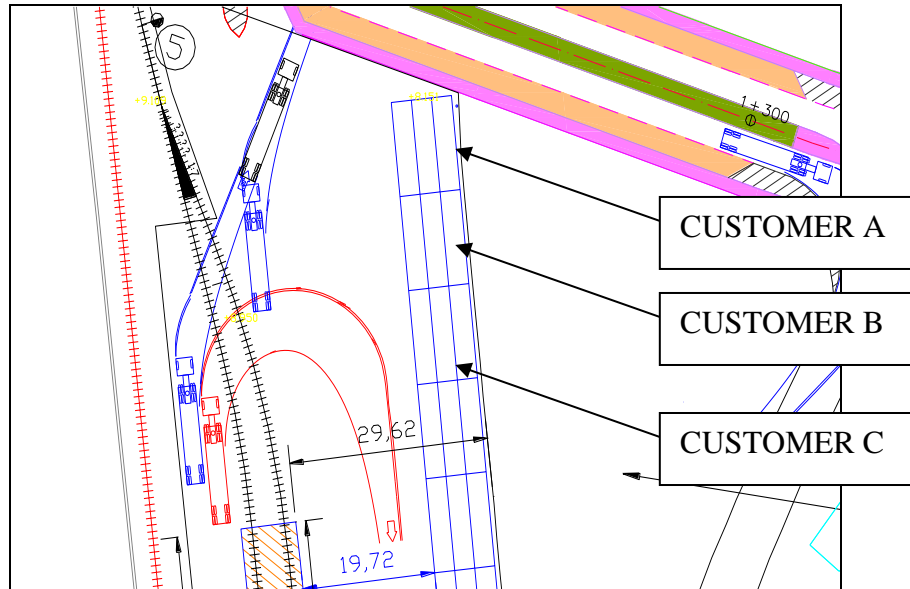


Figure 5 Alternative container placement per customer

3. **One of the rows (facade) must be used for placing empty containers**, and the other two (2) rows must be used for placing laden containers. In this way, the same customer will always be able to use the same space allocated to him, to place empty or laden containers.

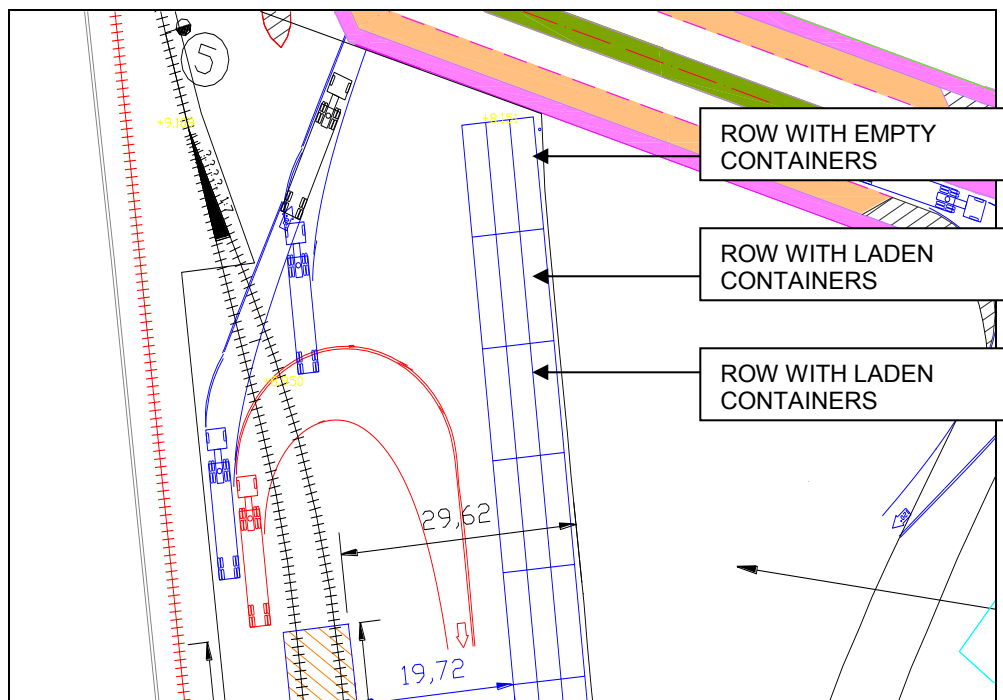


Figure 6 Detail of a container placement arrangement

4. If third parties are allowed to use the railway station area, allocating each storage area to a different customer will contribute towards better management and control.

5. Where containers are to be loaded directly onto a truck, this will be made possible by having the truck approach the road used for movement and then using the handler to grab the container off the train and place it onto the truck trailer.

There are two key container types in terms of dimensions: 20ft containers and 40ft containers Table 5 below shows the technical characteristics of these containers.

Table 5 Container dimensions and technical characteristics

	20ft		40ft	
SPECIFICATIONS				
INTERNAL CAPACITY	32.8m ³		67.2m ³	
CARGO WEIGHT	21,640kg		26,500kg	
TARE WEIGHT	2,360kg		3,980kg	
DIMENSIONS	EXTERNAL	INTERNAL	EXTERNAL	INTERNAL
Length	6.05m	5.90m	12.19m	12.01m
Width	2.44m	2.35m	2.44m	2.35m
Height	2.59m	2.38m	2.59m	2.38m
DOOR DIMENSIONS				
Height	2.28m		2.28m	
Width	2.33		2.33	

The maximum number of laden containers that can be stacked one on top of the other must be approved in consultation with the Station administrator, taking into account the specifications relating to the maximum permissible pressure applied on the station floor. Account must be taken of the fact that a full 40ft container applies a pressure of approximately 1000 kg/m² on the ground.

27.3 HANDLING CARGOES ON RAIL CARS

Where the handling needs to take place in a **closed rail car**, there are two alternatives depending on the type of cargo.

27.3.1 If the cargo is **not arranged on pallets**, workers need to enter the rail car. The truck must park right next to the rail car and the goods must be taken manually from the car to the truck. To ensure better handling and for safety reasons, metal ramps must be used to fill the gap between the car and the truck.

27.3.2 This is what needs to be done if the cargo is **arranged on pallets**. In this case, workers will take the goods up to the rail car door using a manual pallet lift and will then use a diesel (or gas) forklift to lift and place them onto the truck.

Figure 7 below shows how to load/unload goods from the side.

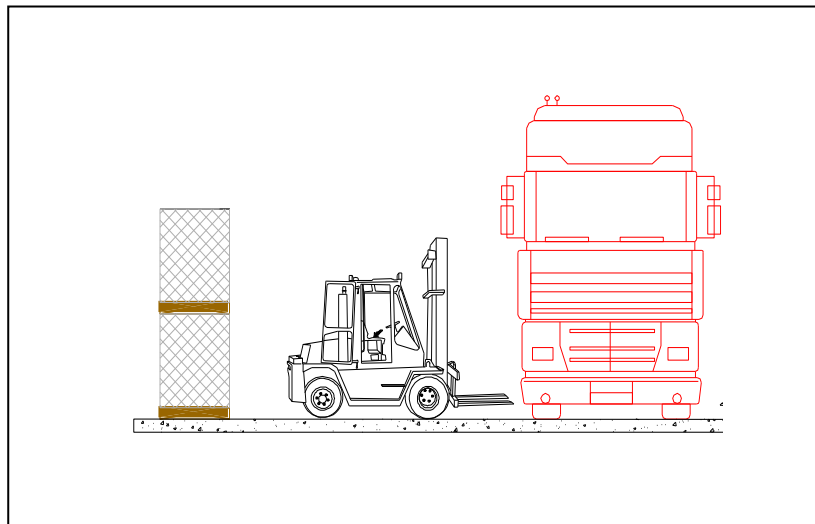


Figure 7 Loading trucks from the side

27.3.3 Finally, if the cargo on a rail track is a **large piece of machinery or a bulky material** which cannot be moved by a forklift, the recipient must have a special type of machinery brought in to unload it.

27.4 RECORDING THE DETAILS OF TRUCKS - TRAINS

To ensure that the railway station functions properly and to be able to provide information to any interested party, the railway station administrator must keep a file of all the customers served, the types of products moved, the rail cars that entered in the railway station, the trucks used to bring the products in or out and the containers placed on the ground.

The above information must be arranged in tables. It is suggested that these tables should have at least the following fields to be completed:

- The following information must be included concerning the movement of trains: No, Date, Customer, Rail Car Type, Entry Time, Exit Time, Platform Number, Comments.
- The following information must be included concerning the containers stored: No, Customer's Name, Container Number, Container Location, Entry Date & Time, Exit Date & Time, Comments.
- The following information must be included concerning the trucks that entered the station: No, Date, Truck Registration Number, Driver's Name, Name of the Customer for whom the transportation took place, Entry Time, Exit Time.

ARTICLE 28

Safety rules

To ensure the unhindered operation of the station, safety rules must be adhered to.

- (1) The railway tracks must be handled by qualified and properly licensed staff only.
- (2) There must be a steady flow of trucks, which should move towards the loading/unloading area only after being instructed to do so by the station officers. All trucks must stop at the entrance to the station to state the purpose of their arrival. The employee stationed at the entrance must then decide and direct the trucks, as to how and where they will be moving.
- (3) Where containers are to be stacked one on top of the other, the pressure applied on the ground must not exceed the floor strength specified by its manufacturer, which has been calculated at 100 kN/m².
- (4) There must be no non-workers moving in the station area, e.g. visitors and waiting drivers.
- (5) Any people moving in the area must not be under suspended cargoes. Signs must be put up to remind them of this prohibition (Figure 8).
- (6) Machinery operators must have obtained the required operator licenses from the competent authorities. Forklifts must not be used to carry any people other than the driver. Signs must be put up to remind them of this prohibition (Figure 8).

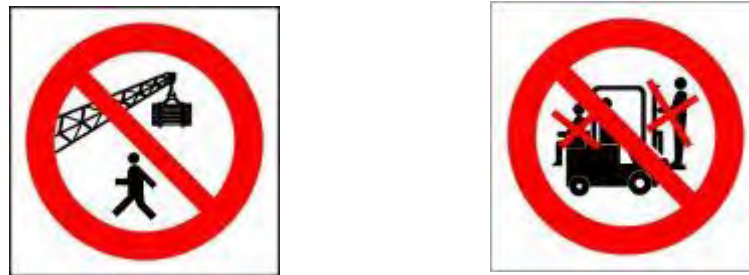


Figure 8 Warning signs

(7) Employees must wear a work uniform bearing the mark “Railway Station - Cargo terminal” and the required protective equipment, e.g. hard hats, safety boots, reflective vests, gloves. Otherwise, the TBP’s BPM may prevent them from entering the station.

Signs must be put up in the station to denote that using the above protective equipment is mandatory (Figure 9).



Figure 9 Signs concerning the mandatory use of protective equipment

- (8) No works will be carried out after expiry of the time specified by the facility officers.
- (9) The (road and rail) signs and the lines, as put up and drawn in the railway station area, must be strictly obeyed, to prevent risks.
- (10) The fire-fighting equipment, as specified and installed by the manufacturing company, must be checked regularly and must be accessible, to be used as necessary. Some of these items of equipment are: dry powder fire extinguisher, carbon dioxide fire extinguisher, wheeled fire extinguisher, fire station, fire cabinet, fire hydrant.
- (11) Garbage needs be collected and removed from the surroundings, to reduce the risk of fire, which could pose risks to the facilities, machinery and stored containers.
- (12) If there is a diesel or gas tank installed to supply the forklift with fuel, it must comply with all the safety specifications, and it must be sheltered and checked regularly to detect any problems. The surroundings must be clean and fitted with the necessary fire-fighting material.
- (13) All moving machinery must be fitted with amber signal lights and the required back-up beepers.
- (14) Any trucks exceeding the 40 km/h speed limit, as specified for the traffic carried out in all TBP roads, will not be allowed to enter the Station area.
- (15) All staff, visitors, operators and drivers must be able to use the jointly-used host and sanitary areas and the AC of the TBP.
- (16) Whether trucks and machinery can park in the controlled Truck Park will be decided on the basis of an agreement reached with the BPM.
- (17) An agreement must be reached with the BPM concerning the security of equipment, vehicles or containers in the railway station area.

ARTICLE 29

Maintenance of facilities

To make sure that the railway station functions properly, particular care needs to be taken for its maintenance aiming to ensure the smooth operation of the facility.

The term "Maintenance" includes the following:

1. To carry out checks and preventive maintenance aiming to ensure the ongoing and proper operation of the facility.
2. To implement the required corrections and improvements and to restore failures, to ensure that the facility functions properly.
3. Upon completion of any preventive or emergency maintenance operation, the competent technician will record the maintenance works carried out in a special form.
4. Maintenance will be carried out in accordance with the relevant instructions and the technical manuals provided by the equipment manufacturers, with the relevant regulations and standards (Technical Guidelines from the Technical Chamber of Greece, ELOT, etc.), as well as with the various provisions and guidelines included in the project construction designs/studies.
5. To maintain the fire-fighting equipment, which falls under the responsibility of the station administrator.
6. To redraw the lines, whenever it is found that they are no longer clearly noticeable.
7. To make sure that the road deck is always kept in good condition.
8. To have the rail track maintained in accordance with the Hellenic Railway Organization's specifications.

CHAPTER VII
AUDIT - SPECIAL PROVISIONS - RESOLUTION OF DISPUTES

ARTICLE 30

Audit of Established Undertakings

The BPM has the right to carry out a preventive audit on the EUs at least once a year. The audit will aim to verify compliance with this Regulation, performance of the EUs' contractual obligations and implementation of the applicable legislation on Industrial Areas, and must alert the EUs' Managements to any weaknesses identified. The above audit may not hinder the operation of the EUs.

ARTICLE 31

Special provisions on the Established Undertakings before adoption of JMD 14723/807/06-08-2003 (Government Gazette, Series II, No 1234/01-09-2003)

1. This Regulation also applies fully to the already established undertaking, which is currently in operation in the TBP, 'MEL - MAKEDONIKI ETAIRIA CHARTOU SA' (MEL SA) (VAT Registration No 094009018), engaging in the manufacture of and trade in cardboard, subject to the following derogations:

(a) MEL SA is not connected to the TBP water supply network and therefore it needs not participate in covering the costs associated with the functioning of the water supply installations and network. The water required for its operation is obtained from the existing boreholes Nos 1, 2 and 4, given that it is the sole party entitled to draw water from these boreholes.

The equipment and machinery used for the above boreholes belong, by full ownership, possession and occupancy, to MEL SA, the latter being under obligation to see to it that they are maintained at its own cost and to bear any expenditure incurred for the operation thereof, as well as to implement any required health and safety measures. The borehole areas must be fenced and kept in perfect condition both in terms of security and in terms of aesthetics and constant care and maintenance thereof.

If MEL SA or the TBP needs more water, either party will address a relevant request to the other party. If so permitted by the needs of the party to which the request is addressed, it may choose to allow the requesting party to draw the quantities of water needed. In that case, the sum charged for the quantity of water supplied will be calculated so as to be equal to the relevant operating cost. Otherwise, whenever it is not permissible to make available water from boreholes other than the above, both MEL and the other users of the water drawn will pay the relevant cost on the basis of the pricelist applicable to all EUs.

(b) MEL SA has set up a private sewage treatment plant. Therefore it needs not participate in covering the costs associated with the maintenance and functioning of the sewerage network and the sewage treatment plant as long as it does not use them. MEL has constructed and been using a full-blow industrial waste treatment and disposal plant for its industrial production needs. The plant has been authorized on a definitive basis by Decision No 30/6837/7.12.2004 of the Prefect of Thessaloniki, which must be complied with strictly. Given that all the sewage and industrial waste from the TBP is subject to all environmental conditions adopted and the ones laid down in JMD Φ/A.6/1/30827/2733/3-7-2007 specifying the operator, location, surface area and limits of the Industrial Park of Kato Gefyra, Thessaloniki (Government Gazette, Series II, No 1223/17-7-2007), or the ones to be adopted in the future on the basis of any relevant arrangement, MEL SA must and has to comply with all the provisions in force. In addition to the provisions laid down in the above Decision, MEL SA must, at its own cost, maintain and operate a full-blown and complete pre-treatment and treatment plant for its industrial sewage and to check the quality and performance of the plant, as well as to take remedial measures when the permissible limits are exceeded. Special care must be taken by MEL SA concerning any odors or sludge, etc. leaks into the adjacent trench located between the railway tracks and Building Block No 5, which belongs to MEL SA. No sewage sludge may be disposed of and/or stored in the plots or jointly-used areas, except temporarily within the boundaries of the plot in which the sewage treatment plant is established. MEL SA must also treat and then dispose of its industrial sewage making sure that the relevant values are always within the permissible limits, as specified in the above Decision and/or as may be modified in the future and apply to the sewage treatment plant established in the TBP. If it is duly established at any time that the plant operated by MEL SA is not functioning in accordance with the above, MEL SA will have to see to it that immediate action is taken, at its own cost, to remodel/improve the plant with a view to making sure that the above requirements are met. All the costs incurred for the functioning, remodeling, improvement of the sewage treatment plant operated by MEL SA will be borne solely by MEL SA. If MEL SA fails to comply immediately, in addition to incurring all the sanctions provided for in the provisions in force, it will have to pay all the fines that may be imposed on MEL SA, or on the BPM on account of MEL SA, as well as to pay all the compensations required by law for any direct/indirect losses suffered by the BPDC or the BPM. As for the rest, the procedures and checks to be carried out by the BPM, as provided for in the regulation, will apply.

(c) For as long as MEL SA owns non-built plots, the temporal restrictions laid down in Article 6(2) will not apply.

(d) MEL SA will have the discretion to choose whether Article 6(14) will apply or not to its building facilities that existed prior to publication of this Operating Regulation.

2. MEL SA must implement all health and safety measures at its existing electricity supply and pumping/tank facilities. All the above areas must be kept in perfect condition, in line with the general aesthetics of the TBP and must be safely fenced.

3. MEL SA will have a holding in BPM's share capital by such a ratio that corresponds to land it owns in the total area of the TBP.

4. MEL SA will not have any voting rights in the General Assembly or the BoD, either directly or through the members it has recommended for election in the BPM's BoD, as regards the water supply and sewerage networks and the CWTDP.

ARTICLE 32

Resolution of disputes

Any disputes arising between the BPM and the EUs relating to the interpretation and implementation of this Regulation or to possible gaps thereof will be resolved only by the courts seating in the area of Thessaloniki

CHAPTER VIII
MISCELLANEOUS

ARTICLE 33
Final Provisions

If, due to objective reasons, it is impossible to apply some of the provisions of the Regulation, the resulting issues will be regulated accordingly by decisions of the BPM's BoD.

ARTICLE 34
Amending the Operating Regulation

This Operating Regulation may be amended at any time upon proposal from the BPM's BoD and by resolution of the BPM's General Assembly to be adopted by a quorum of 2/3 and a majority of 2/3 of the attending shareholders. The amendment procedure will be the same as that used for the ratification of the Regulation, unless otherwise specified by law.

This decision will enter into force as of its signing date.

This decision will be published in the Government Gazette of the Hellenic Republic.

PART II

STATEMENTS OF CONFORMITY

in accordance with Ministerial Decision No Φ A.15/3/925/76

(Government Gazette, Series II, No 355, 2012)

The attached documents are adapted to the relevant applicable laws.

**CERTIFICATE OF CONFORMITY FOR ESTABLISHMENT & COMPLIANCE WITH
COVERAGE RATIO under Article 43 paragraph 2 of Law 3982/2011**

BPDC: VIPATHE SA

THESSALONIKI BUSINESS PARK, TYPE B (TBP)

Kato Gefyra, Agios Athanasios, Municipality of Chalkidona
23rd km of the Thessaloniki-Edessa National Road Thessaloniki, 570 03

T: 2310 715880 – 2106969436

F: 2310 715882- 210 6968025

E: eppathe@vipathe.gr

To:

Details of the undertaking to be established

Mailing address

Tel.

Fax

e-mail

VAT Reg. No

Cc.:

Ministry of Development, Competitiveness and Shipping

General Secretariat for Industry Directorate for the Environment & Spatial Planning

119 Mesogeion Ave., 11526 Athens

**CERTIFICATE - STATUTORY DECLARATION OF CONFORMITY
FOR ESTABLISHMENT OF THE UNDERTAKING IN THE TYPE B TBP & COMPLIANCE
WITH COVERAGE RATIO under Article 43 paragraph 2 of Law 3982/2011**

This certificate is deemed to be a Statutory Declaration under Article 8(4) of Law
1599/1986.

The BPDC “VIPATHE SA”, having regard to:

1. Law 3982/ 2011 (Government Gazette, Series I, No 143, 2011) “Simplification of the authorisation procedure for technical professional and processing activities and business parks, and other provisions”.
2. Article 8(4) and Article 22(6) of Law 1599/1986 (Government Gazette, Series I, No 75/1968) “State-citizen relations, establishing a new identity card and other provisions”.

3. Joint Ministerial Decision 3137/191/Φ. 15 (Government Gazette, Series II, 1048/2012) "Matching of the categories of industrial and handicraft activities based on the nuisance grades referred to in town planning ordinances"
4. Decision No Φ A.15/3/925/76 (Government Gazette, Series II, No 355/2012) of the Deputy Minister for Development, Competitiveness and Shipping "Determination of the process for complying with the maximum coverage ratio for the activities laid down in the second part of Law 3982/2011, and the type and content of the certificate of conformity of the activity of the undertaking to be installed with the type of the Business Park".
5. The Operating Regulation of the Thessaloniki Business Park.
6. Your company's application dated ... / ... /

Being in full knowledge of the criminal consequences laid down in Article 22(6) of Law 1599/1986⁽¹⁾ and the administrative penalties of Ministerial Decision No Φ A.15/3/925/76 (Government Gazette, Series II, No 355/2012, it is certified that:

- (a) the activity of your business is of medium/low disturbance, is compatible with the type of the Thessaloniki Business Park, complies with the provisions of Article 43 of Law 3982/2011 or with the provisions of Article 2 of Law 2545/1997, and its establishment is permitted, and
- (b) the establishment of this activity in the plot with a surface area of sqm., with topographical referencelies within the maximum coverage ratio limits laid down in Article 43(2) of Law 3982/2011, as determined Article 47(2) of the aforementioned Law (JMD 14723/807/ 06.08.2003 (Government Gazette, Series II, No 1234/01.09.03) as amended by JMD Φ/A.6/1/30827/2733/3-7-2007 (Government Gazette, Series II, No 1223/ 07.17.07)

Date,

Signature

(1) Any person who submits knowingly a written solemn declaration as per Article 8 assuming the presence of inexistent facts or denying or concealing the presence of existing ones will be sentenced to at least three months imprisonment. If the person liable for such actions had intended to acquire a material advantage for himself/herself or another person by harming a third party, he/she is punished with 10 years imprisonment.

**CERTIFICATE OF CONFORMITY FOR BUSINESS MODERNISATION/EXPANSION
WITHOUT EXCEEDING THE NUISANCE LIMIT**

BPDC: VIPATHE SA

THESSALONIKI BUSINESS PARK, TYPE B (TBP)

Kato Gefyra, Agios Athanasios, Municipality of Chalkidona

23rd km of the Thessaloniki-Edessa National Road Thessaloniki, 570 03

T: 2310 715880 – 210 6969436

F: 2310 715882 – 210 6968025

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e-mail.....

VAT Reg. No

Cc.:

Ministry of Development and Competitiveness

General Secretariat for Industry Directorate for the Environment & Spatial Planning

119 Mesogeion Ave., 11526 Athens

**CERTIFICATE - STATUTORY DECLARATION OF CONFORMITY FOR BUSINESS
MODERNISATION/EXPANSION IN THE TBP TYPE B**

This certificate is deemed to be a Statutory Declaration under Article 8(4) of Law
1599/1986

The BPDC “VIPATHE SA”, having regard to:

1. Law 3982/2011 (Government Gazette, Series I, No 143, 2011) “Simplification of the authorisation procedure for technical professional and processing activities and business parks, and other provisions”.
2. Article 8(4) and Article 22(6) of Law 1599/1986 (Government Gazette, Series I, No 75/1968) “State-citizen relations, establishing a new identity card and other provisions”.

3. Joint Ministerial Decision 3137/191/Φ.15 (Government Gazette, Series II, 1048/2012) "Matching of the categories of industrial and handicraft activities based on the nuisance grades referred to in town planning ordinances"
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5. The Operating Regulation of the Thessaloniki Business Park.
6. Your company's application dated ... / ... /

Being in full knowledge of the criminal consequences laid down in Article 22(6) of Law 1599/1986⁽¹⁾, and the administrative penalties of Ministerial Decision No Φ A.15/3/925/76 (Government Gazette, Series II, No 355/2012, certifies that the modernisation/expansion of your business and the increase of its authorised daily installed capacity by ...% does not lead to a change in nuisance category and is compatible with the type of the Thessaloniki Business Park.

Date,

Signature

(1) Any person who submits knowingly a written solemn declaration as per Article 8 assuming the presence of inexistent facts or denying or concealing the presence of existing ones will be sentenced to at least three months imprisonment. If the person liable for such actions had intended to acquire a material advantage for himself/herself or another person by harming a third party, he/she is punished with imprisonment of up to 10 years.

**CERTIFICATE OF CONFORMITY FOR ESTABLISHMENT & COMPLIANCE WITH
COVERAGE RATIO under Article 43 paragraph 2 of Law 3982/2011**

BPM: Thessaloniki Business Park Manager SA (TBPM SA)

THESSALONIKI BUSINESS PARK, TYPE B (TBP)

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WITH COVERAGE RATIO under Article 43 paragraph 2 of Law 3982/2011**

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1599/1986.

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Date,

Signature

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**CERTIFICATE OF CONFORMITY FOR BUSINESS MODERNISATION/EXPANSION
WITHOUT EXCEEDING THE NUISANCE LIMIT**

BPM: Thessaloniki Business Park Manager SA (TBPM SA)

THESSALONIKI BUSINESS PARK, TYPE B (TBP)

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Date,

Signature

(1) Any person who submits knowingly a written solemn declaration as per Article 8 assuming the presence of inexistent facts or denying or concealing the presence of existing ones will be sentenced to at least three months imprisonment. If the person liable for such actions had intended to acquire a material advantage for himself/herself or another person by harming a third party, he/she is punished with imprisonment of up to 10 years.

PART III

ENVIRONMENTAL MANAGEMENT REGULATION

in accordance with Joint Ministerial Decision 14723/807/2003

(Government Gazette, Series II, No 1234/01-09-2003)

Applicable as brought into line with the Ministerial Decision on placing the TBP under the provisions of Law 3982/11 on Business Parks (Government Gazette, Series II, No 2335/2013 and as will be changed for any legitimate future adaptation.

ENVIRONMENTAL MANAGEMENT REGULATION

INTRODUCTION: SCOPE - SUMMARY

This Environmental Management Regulation contains general and specific obligations as regards environmental protection, both for the Business Park Manager (BPM) of the TBP and the industrial and craft undertakings which have been, or are currently being, established in the TBP (established undertakings - EUs), as deriving mainly from relevant legislation.

The Regulation was designed with a view not to substituting legal texts, but to providing a wider context to be used by the BPM to ensure, in harmonious cooperation with the EUs, the smooth operation of the TBP, always with respect for the environment.

The purpose of the Regulation is to establish in a clear and understandable way the requirements and the organisational and operating procedures related to proper environmental management, both for the BPM of the TBP and the undertakings to be established therein.

To achieve this objective, the Regulation is broken down into 10 main thematic sections, which cover with the utmost thoroughness all environmental management aspects and parameters related to the operation of the TBP. The structure of the regulation and the choice of sections were based, as far as possible, on the rationale of standard ELOT EN ISO 14001: 2004 (Environmental Management Systems) to ensure an integrated, comprehensive and systematic addressing of environmental management issues. It should be noted that greater emphasis has been placed certainly on the elaboration of the sections laying down the formal requirements and several more practical environmental management issues.

It is clarified that the said Environmental Management Regulation is a dynamic and flexible “tool” which may be subject to appropriate amendments and changes, if deemed appropriate in the future, in order to ensure its continuous improvement.

It should be noted that the need for preparing this Environmental Management Regulation, as a legal obligation, derives from the applicable Environmental Terms Approval Decision for the TBP (Joint Ministerial Decision Φ/A.6/1/30827/2733/2007), as amended and in force until 17.09.2017, and from the applicable national legislation on the Development of Business Parks (Law 3982/2011), and is an integral complement of the Operating Regulation of the TBP.

Finally, it is underlined that this Environmental Management Regulation is an integral part of the Operating Regulation of the TBP.

SCOPE

The Environmental Management Regulation covers all activities, main or auxiliary, taking place at the premises of the TBP, Kato Gefyra district, the TBP, at Kato Gefyra, Agios Athanasios, Chalkidona, Thessaloniki.

Compliance with the rules laid down therein is obligatory for all employees, no matter their rank, class or position. This obligation is validated by the commitment of the Business Park Manager (BPM) to comply with and implement the Environmental Management Regulation (through the environmental policy).

Environmental Management Regulation of the TBP

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1. ENVIRONMENTAL POLICY



GENERAL

The environmental policy is the driving force for implementation and continuous improvement of the Special Environmental Management Regulation of the TBP. It reflects BPM's commitment to comply with regulatory environmental protection requirements and keep on improving in this direction.

This includes in a concise, yet clear and understandable, manner the key environmental management principles governing the operation of the TBP and are binding, except for the BPM, on all industrial and craft undertakings and logistics establishments which are already operating, or will operate, in the TBP.

The BPM shall have the responsibility to disclose the environmental policy in the TBP. Said policy will be made available to the public (interested parties, services, local government, etc.) and company partners, including any contractors/subcontractors working on site.

By applying the Special Environmental Management Regulation, as described in this article, the BPM and the EUs will implement TBP's environmental policy on a day-to-day basis.

The environmental policy of the TBP is as follows:

Environmental policy of the BPM and the EUs

The BPM and the EUs will constantly try to improve the level of activities and services, in such a way as to contribute to sustainable development and environmental protection.

In this context they are committed to continuously reduce the negative environmental impact, to comply fully with applicable environmental legislation and all relevant and widely accepted best practices, aimed at saving natural resources and preventing pollution.

To achieve this, the BPM and the EUs are committed:

1.1 To hold all required authorisations relating to environmental protection

1.2 To ensure compliance with relevant Greek and EU environmental legislation and other legal or non-legal requirements relating to environmental protection

1.3 To delegate management of environmental issues to a natural or legal person with the appropriate expertise and experience

1.4 To see that the EUs comply with the environmental terms approval decisions and, generally, to make sure that they operate in such a way as to minimise environmental impact and achieve energy efficiency while saving natural resources

1.5 To take account of new scientific and technological data, aiming to reduce the environmental impact

1.6 To inspect periodically all the equipment and procedures to ensure that the measures taken to protect the environment are effective

1.7 To evaluate periodically the management of environmental issues in order to achieve continuous improvement of environmental performance

1.8 To always communicate BPM's environmental policy to plant operators, contractors, suppliers and partners

1.9 To ensure that each EU provides education, training and motivation to its staff on an ongoing basis, in order to foster a sense of environmental awareness and accountability

1.10 To promote and encourage the exchange of environmental knowledge and experience with local authorities and other relevant entities in order to achieve the best possible result for society

1.11 To make sure that information is exchanged with the social community in a spirit of sincere dialogue and mutual respect

2. ORGANISATIONAL STRUCTURE AND RESPONSIBILITIES

2.1. Head of Environmental Management

The Head of Environmental Management is appointed and dismissed by the BPM and may be a natural or legal person with appropriate expertise and experience.

The duties of the Head of Environmental Management, *inter alia*, include:

- ✧ monitoring compliance with the Environmental Management Regulation by the BPM and the EUs;
- ✧ communicating with the EUs on issues pertaining to environmental management and compliance with their environmental conditions associated with the environmental performance of the TBP;
- ✧ communicating with external competent bodies (services, local government, etc.) concerning the environmental issues of the TBP;
- ✧ monitoring the functioning of pollution control systems (e.g. wastewater treatment plant), as provided for by the Environmental Terms Approval Decision (ETAD) of the TBP and relevant legislation;
- ✧ delegating and organising the conduct of measurements/analyzes of environmental parameters set out in the ETAD of the TBP and relevant legislation;
- ✧ collecting environmental data and information from the EUs to monitor their performance in terms of environmental protection, and the environmental performance of the TBP;
- ✧ informing the BPM and the EUs of the overall environmental performance of the TBP and achievement of relevant objectives;
- ✧ monitoring/updating the relevant environmental legislation and licenses;
- ✧ providing education and training to the BPM staff in environmental management issues or issues related to the EUs, if such a cooperation is so decided.

2.2 Environmental Committee

The Environmental Committee is the main collective body, which is responsible for managing environmental issues of the TBP when collective consultation is required for decision making purposes.

The Environmental Committee consists of the following five members:

- ☞ 1. Representative of the BPM BoD (presiding)
- ☞ 2. Head of Environmental Management (of the BPM or third contractor-partner), and
- ☞ 3. Representatives of the EUs (e.g. rotating annually) appointed or elected by the BPM.

Depending on the issues to be discussed, the relevant officers in charge of ensuring compliance with the environmental conditions of the EUs employed in the TBP, and other staff may, where appropriate, either be invited or request themselves to take part in the Committee's meetings.

The Environmental Committee meets periodically, and may be convened urgently if necessary. Its members are not paid.

The Committee's role is executive and decisions made at meetings are binding on all members.

The responsibilities of the Environmental Committee include:

- ✧ conducting consultation on issues of environmental concern relating to the operation of the TBP;
- ✧ establishing the Environmental Policy;
- ✧ discussing the BPM's environmental management decisions;
- ✧ reviewing the Environmental Management Regulation;
- ✧ managing major non-conformities, etc.

- ✧ providing opinions on disputes between the BPM and the EUs and proposals for the resolution of issues.

It is noted that in addition to the above issues described in paragraphs 2.1 and 2.2, all employees of the TBP are obliged to follow the key rules of sound environmental management (e.g. orderliness, cleanliness, etc.). For this reason, their job description must set out, among their other duties, their clear obligations as regards environmental protection.

3. SIGNIFICANT ENVIRONMENTAL ISSUES

3.1. General

Based on its environmental policy, the TBP plans and implements the necessary actions to identify and effectively address the environmental issues associated with its activities.

- *Environmental issue* is any information that results from the activities of the TBP and can have an impact on the environment.
- *Environmental impact* is any change to the environment, either positive or negative, reversible or permanent, due in whole or in part to any environmental issue resulting from the activities of the TBP.

This Environmental Management Regulation, taking into account the laws and any other requirements (European legislation, permits, studies, codes of practice, etc.), including the TBP's policy, identifies and analyses the environmental issues arising from the productive activities of the EUs and the overall operation of the TBP.

In addition, it identifies and analyses the environmental issues that emerge from the remaining (non-productive) activities taking place within the TBP, such as maintenance of equipment/facilities, staff activities and other environmental issues.

Environmental impact is examined and recorded, where appropriate, for every environmental issue, under both normal and emergency operating conditions. In this context, all activities carried out in the premises, both productive and supporting, as well as other activities that have an environmental impact (e.g. activities of suppliers and contractors/subcontractors), are reviewed.

Thereafter, the importance of each environmental issue is evaluated based on selected criteria, such as:

- impact on the local environment;

- toxicity;
- impact on natural resources;
- legal and other requirements.

Significance is characterised as low, medium or high, as appropriate.

A table is compiled (see Section 3.3) based on all the above criteria to describe and analyse the key environmental issues of the TBP.

Monitoring of environmental issues, possible revisions of the table of analysis of environmental issues, as described in this Regulation, in the ETAD of the TBP, and in the individual ETADs of the EUs, and other similar issues are examined in the meetings conducted by the Environmental Committee, and on an *ad hoc* basis, in case of significant changes in equipment, operating conditions, legislation, etc.

In addition to the environmental issues pertaining to the premises, this Regulation addresses any environmental issues that may arise from the activities of suppliers/contractors/subcontractors in the TBP. Therefore, before initiating cooperation with a main supplier/contractor/subcontractor and depending on the type of service/material, it is advisable to assess its environmental awareness. In this context, and if deemed advisable, a letter is sent to describe the main environmental effects of its operations and the appropriate measures proposed to address them. The supplier/contractor/subcontractor must take account of the recommendations and, if necessary, notify the BPM of the actions made or to be made, and the results. In the event that a supplier/contractor/subcontractor fails to comply with the requirements of the Environmental Management Regulation, then Section 6 (Non-conformities/Corrective and preventive actions) shall apply.

3.2. Environmental objectives and targets

Environmental objectives and targets are defined as follows:

- Environmental objective is an overall environmental aim that is set to be met by the TBP, with a view to addressing environmental issues, in line with the environmental policy. For each environmental issue one or several environmental objectives can be set.

- *Environmental target* is any specific and, where possible, quantified requirement, which is set to meet the respective environmental objective. For each environmental objective several environmental targets can be determined, along with their respective time frames.

To address an environmental issue that has been identified, as has been mentioned previously, one or more environmental objectives are set, which are recorded properly and monitored by the Head of Environmental Management or by each competent officer designated by the Environmental Committee.

The main environmental objectives for the TBP are:

- ✧ rational management and reduction of solid waste, where possible;
- ✧ conservation of natural resources (water, energy, etc.);
- ✧ rational management of any hazardous waste;
- ✧ rational management of wastewater and rainwater;
- ✧ reducing greenhouse gas emissions in the air;
- ✧ reducing noise and odour emissions in the air;
- ✧ avoiding emergencies and minimising their consequences.

Furthermore, specific quantitative and qualitative indicators are set, where possible, regarding environmental issues through which performance in the TBP's environmental management, is monitored.

The environmental performance indicators are determined taking into account the policy and objectives of the TBP, reduction in the consumption of natural resources and energy, reduction in pollutants and waste, inspection reports, and the relevant meetings of the Environmental Committee.

The indicators selected must:

- give an accurate appraisal of the environmental performance of the TBP;
- be understandable and unambiguous;
- allow for year on year comparison to assess the environmental performance of the TBP;
- allow for comparison with sector, national or regional benchmarks as appropriate;
- allow for comparison with regulatory requirements as appropriate.

The indicators may be reviewed by the BPM through the Head of Environmental Management at the regular meetings of the Environmental Committee.

Monitoring of the implementation of environmental objectives and targets set together with any new information arising from major changes in equipment, operating conditions, legislation, or other reasons, will be considered by the Head of Environmental Management and discussed at the regular meetings to be held by the Environmental Committee.

1.1 Analysis of the TBP environmental issues

*1: Impact on the local environment *2: Toxicity *3: Impact on natural resources *4: Yes or No *S: Significance

H: High S: Medium L: Low

TABLE OF ANALYSIS OF the TBP ENVIRONMENTAL AFFAIRS

Activity	Environmental issue	Impact	Criteria-significance					Legal & other requirements	S*	Purpose	Response measure	Indicator (Measured parameter)	Objective
			1*	2*	3*	4*	Requirement						
Productive activity of facilities within the TBP	Industrial solid waste (hazardous and non-hazardous)	Soil and aquifer pollution	M S	M S	M S	YES	JMD Φ/A.6/1/30827/2733/2007 JMD 50910/2727/2003 JMD 29407/3508/2002 JMD 22912/1117/2005 Regulation 259/1993 JMD 13588/725/2006 JMD 24944/1159/2006 PD 82/2004 JMD 11535/1993 License for solid waste treatment ETAD for the establishments	M S	Rational solid waste management	Collection, transportation, storage and management of solid waste/sludge in accordance with applicable law. Determination of a secure storage space for industrial waste within the TBP, based on the relevant study Safe disposal alternative outside the TBP by certified operators Preparation and submission of a specific solid waste management plan to the Directorate for the Control of Air Pollution and Noise (EARTH) of the Ministry of the Environment, Energy and Climate Change. Prohibition of any deposition of solid waste at the discharge points of streams and torrents, inside and outside Business Parks Type B. Immediate removal of any existing deposits inside or in the perimeter of Business Parks Type B.	Quantity in tn/yr		

OPERATING & ENVIRONMENTAL MANAGEMENT REGULATION

Activity	Environmental issue	Impact	Criteria-significance					Legal & other requirements	S*	Purpose	Response measure	Indicator (Measured parameter)	Objective
			1*	2*	3*	4*	Requirement						
			Productive activity of facilities within the TBP	Hazardous industrial solid waste	Soil and aquifer pollution	H S	H S						
Operation of establishments and activities of TBP staff Activity of contractors/subcontractors in the TBP	Urban solid waste	Soil and aquifer pollution	M S	LS	LS	YES	JMD φ/A.6/1/30827/2733/2007 JMD 50910/2727/2003 ETAD for the establishments	LS	Rational solid waste management	Collection of urban solid waste in large containers and transport to landfills serving the local authorities of the wider locality.	Quantity in tn/yr		
Operation of establishments and activities of TBP staff Activity of contractors/subcontractors in the TBP	Recyclable solid waste and packaging (metals, paper, glass, etc.)	Soil pollution Consumption of natural resources	M S	LS	M S	YES	JMD φ/A.6/1/30827/2733/2007 JMD 50910/2727/2003 Law 2939/2001 JMD 9268/2007 ETAD for the establishments	M S	Reduction of solid waste Conservation of natural resources	Recycling of solid and recyclable waste. Delivery of collected packaging (metal, glass, paper, etc.) to appropriate licensed contractors for recovery. Preparation and submission for approval by the competent department of the Ministry of Environment, Energy and Climate Change of a special recyclable waste collection plan and installation of special buckets for the collection of materials by type.	Recycling rate (%)	Increase	
Operation of establishments and staff activities of	Special waste streams	Soil and aquifer pollution	H S	M S	H S	YES	JMD φ/A.6/1/30827/2733/2007 JMD 50910/2727/2003	H S	Reduction of solid waste	Alternative management of special waste streams according to the provisions in relevant legislation.	Utilisation rate (%)	Increase	

OPERATING & ENVIRONMENTAL MANAGEMENT REGULATION

Activity	Environmental issue	Impact	Criteria-significance					Purpose	Response measure	Indicator (Measured parameter)	Objective	
			1*	2*	3*	Legal & other requirements						S*
						4*	Requirement					
Business Parks Type B Activity of contractors/subcontractors in the TBP		Consumption of natural resources					Law 2939/2001 PD 82/2004 JMD 98012/2001/1996 PD 117/2004 PD 15/2006 PD 115/2004 PD 109/2004 ETAD for the establishments	Conservation of natural resources	Management of waste lubricating oil from each plant (e.g. change of engine oil), taking care of each facility and in accordance with the procedures laid down by relevant legislation. Where possible, delivery of waste, through an appropriate licensed waste collector, to an approved alternative management system for further processing, with priority given to regeneration. The uncontrolled discharge into the environment or with any other waste from the plant, is prohibited.			
								Collection of end of life electrical and electronic equipment, waste batteries/accumulators and used tires of vehicles through approved alternative management systems, in accordance with the applicable provisions.				

OPERATING & ENVIRONMENTAL MANAGEMENT REGULATION

Activity	Environmental issue	Impact	Criteria-significance					Purpose	Response measure	Indicator (Measured parameter)	Objective
			1*	2*	3*	Legal & other requirements	S*				
						4*					
<p>Productive activity of facilities within the TBP</p> <p>Activity of contractors/subcontractors in the TBP</p>	Liquid waste	Pollution of water discharges and the aquifer	H S	H S	M S	YES	<p>Decision No ΔY/22374/91/11-01-1994 of the Prefect of Thessaloniki</p> <p>JMD Φ/A.6/1/30827/2733/2007</p> <p>Decision No 30/6164/19-09-2006 of the Prefecture of Thessaloniki</p> <p>Circular No A5/950/16-04-1984 of the Ministry of Health, Welfare and Social Security</p> <p>License for liquid waste treatment</p> <p>ETAD for the establishments</p> <p>JMD 14723/807/03</p> <p>JMD E1β 221/22-1-1965</p> <p>JMD 82/2004</p>	H S	Rational liquid waste management	<p><u>EXIT OF FACILITIES</u></p> <p>Temperature pH BOD₅ COD Suspended Solids (SS) Fats-oils (of animal/vegetable origin) Fats-oils (of synthetic/mineral origin) Detergents (80% biodegradable) Ammonia Nitrites Nitrites Phosphates (P) Total sulphite (SO₃) Total sulphates (SO₄) Total hydrogen sulfide (H₂S) Cyanides (CN) Arsenic Chromium (III) Chromium (VI) Copper (Cu) Zinc Iron Aluminium Nickel Mercury Cobalt Cadmium Antimony Barium Beryllium Boron Bromine Fluorine Manganese Molybdenum Silver</p>	<p><u>EXIT OF FACILITIES</u></p> <p>Temperature ≤28o C pH: 6-9 BOD₅ ≤500 mg/l COD ≤1000 mg/l Suspended solids (SS) ≤500 mg/l Fats-oils (of animal/vegetable origin) ≤40 mg/l Fats-oils (of synthetic/mineral origin) ≤15 mg/l Detergents (80% biodegradable) ≤20 mg/l Ammonia ≤25 mg/l Nitrites ≤4 mg/l Nitrites ≤20 mg/l Phosphates (P) ≤10 mg/l Total sulphites (SO₃) ≤1 mg/l Total sulphates (SO₄) ≤500 mg/l Total hydrogen sulfide (H₂S) ≤1 mg/l Cyanides (CN) ≤0.1 mg/l Arsenic ≤0.5 mg/l Chromium (III) ≤1 mg/l Chromium (VI) ≤0.2 mg/l Copper (Cu) ≤0.2 mg/l Zinc ≤ 20.5 mg/l Iron ≤ 2 mg/l Aluminium ≤1 mg/l Nickel ≤0.5 mg/l Mercury ≤0.01 mg/l Cobalt ≤2 mg/l Cadmium ≤0.05 mg/l Antimony ≤0.5 mg/l Barium ≤2 mg/l Beryllium ≤2 mg/l Boron ≤2 mg/l Bromine ≤1 mg/l Fluorine ≤2 mg/l Manganese ≤1 mg/l Molybdenum ≤2 mg/l</p>

OPERATING & ENVIRONMENTAL MANAGEMENT REGULATION

Activity	Environmental issue	Impact	Criteria-significance					S*	Purpose	Response measure	Indicator (Measured parameter)	Objective
			1*	2*	3*	Legal & other requirements						
						4*	Requirement					
									<p>Discharge in the Thermaic Gulf (through trenches 1-T.9 and 1-T) after adequate treatment in the Central Waste Treatment and Disposal Plant (KMEDA). Processing includes the following steps:</p> <ul style="list-style-type: none"> ▪ screening/desanding/oil collection ▪ pre-aeration-equalisation tank ▪ mechanical separation of solids ▪ flocculation-precipitation ▪ bioselector ▪ biological treatment (aeration) ▪ liquid separation of sludge ▪ discharge measurement ▪ disinfection (chlorination) ▪ sludge digestion ▪ sludge thickening-dewatering 	<p>Tin Titanium Lead Phenols Precipitating solids</p>	<p>Silver ≤0.5 mg/l Tin ≤1 mg/l Titanium ≤2 mg/l Lead ≤ 0.5 mg/l Phenols ≤0.5 mg/l Precipitating solids ≤10 mg/l</p>	
								<p>Automatic Monitoring and Control System for the operation of the CWTDP The automatic control system detects faults and produces alarms for the responsible operator of the facility to intervene.</p> <p>Performing inspections in cooperation with the competent departments (Environmental Protection Directorate of the Thessaloniki Prefecture) for detecting any infringements.</p>	<p>EXIT OF KMEDA</p>	<p>EXIT OF KMEDA</p> <p>pH: 6.0 - 9.5 BOD₅ ≤ 40 mg/l SS ≤ 50 mg/l Temperature ≤ 28 oC Dissolved oxygen ≥ 3 mg/l Electric conductivity ≤ 750 μS/cm (20 °C) Chlorides ≤ 120 mg/l Floating or precipitating solids, sludge deposition, pectins, oils, fats: No Other provisions: in accordance with the applicable provisions</p>		
								<p>Developing a specific emergency response plan (e.g. power failure, technical failure, etc.)</p>	<p>pH BOD₅ SS Temperature Dissolved oxygen</p>			
								<p>Collecting screenings, sands and fats on a regular and timely basis, so as to avoid odours and insect outbreaks</p>	<p>Electrical conductivity Chlorides Floating or precipitating solids, sludge deposition, pectins, oils, fats</p>			
								<p>Frequent cleaning of deposits (tartar) on pressure and physical flow ducts. Keeping a registry of repairs, obstructions and other work in the wells and piping of the network.</p>	<p>Other parameters</p>			

OPERATING & ENVIRONMENTAL MANAGEMENT REGULATION

Activity	Environmental issue	Impact	Criteria-significance					S*	Purpose	Response measure	Indicator (Measured parameter)	Objective
			1*	2*	3*	Legal & other requirements						
						4*	Requirement					
									<p>Conducting chemical analyzes (two samples per month minimum) in an appropriate laboratory from KMEDA outflow. Listing of analysis results in a special register certified by the competent Environmental Protection Directorate of the Thessaloniki Prefecture.</p> <p>Notifying promptly the competent environmental departments of the Thessaloniki Prefecture in case of fault or failure of the establishments and reporting the required recovery time. More specifically:</p> <p>In case of short-term failures, planning the provision of an appropriate number of bypass pipelines with safety valves to channel raw sewage into storage - equalisation tanks until the failure is restored (a few hours).</p> <p>In case of longer failures, planning the construction of a tank for storing an amount of at least two days.</p>			
Treatment of the TBP liquid waste (KMEDA)	Produced sludge	Soil and aquifer pollution	M S	M S	M S	YES	<p>JMD 50910/2727/2003</p> <p>JMD НΠ 13588/725/2006</p> <p>JMD Φ/Α.6/1/30827/2733/2007</p> <p>ETAD for the establishments</p>	M S	Rational solid waste management	<p>Conducting regular inspections of the quality of processed sludge discharged from KMEDA. Verifying classification of waste as hazardous/non-hazardous, depending on the results, and handling waste as appropriate, in accordance with the provisions in relevant legislation.</p> <p>Temporary storage of produced sludge for up to one year</p> <p>Disposal of sludge by authorised operators, depending on the hazard potential of the material.</p> <p>Proper licensing for carriage of sludge by transportation means of the Business Park Type B.</p>	Quantity in tn/yr	

OPERATING & ENVIRONMENTAL MANAGEMENT REGULATION

Activity	Environmental issue	Impact	Criteria-significance					Legal & other requirements	S*	Purpose	Response measure	Indicator (Measured parameter)	Objective
			1*	2*	3*	4*	Requirement						
Operation of establishments in the TBP, in general	Rainwater	Soil and aquifer pollution	LS	LS	LS	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments	LS	Rational rainwater management	Discharge of rainwater from each establishment in the rainwater network of the Business Park Type B. Weak load waste water (e.g. condensation water, air-conditioning, etc.) may be evacuated into the rainwater network, subject to a special permission from the competent department. Cleaning and maintenance of the rainwater network (cleaning wells to remove debris or solid waste of any kind) and the bed of the drainage ditches that serve the surface runoff of water, water streams and engineering structures			
Productive activity of facilities within the TBP Activity of contractors/subcontractors in the TBP	Suspended particulates (TSP, PM ₁₀)	Air pollution	H S	M S	LS	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments PD 1180/1981	M S	Reducing emissions in the air	Operation of dedusting systems (filters) in all the establishments, where required under applicable legislation and the relevant licence. Taking appropriate measures to address the dust emissions from establishments with associated emissions (e.g. from aggregates): <ul style="list-style-type: none"> ▪ in storage areas (e.g. indoor facilities, wetting systems) ▪ in the material handling areas (e.g. covered transport trucks) Tree planting within the limits of the plot of each establishment and the perimeter of the Business Park Type B.	Concentration of suspended particulates emitted	<100 mg/Nm ³	
Productive activity of facilities within the TBP	Asbestos emissions	Air pollution	H S	H S	LS	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments JMD 8243/1113/1991	H S	Reducing emissions in the air	Implementation of the measures set out in relevant legislation	Asbestos emissions	Asbestos emissions ≤ 0.1 mg/Nm ³ for discharged flue gases ≥ 5000 m ³ and asbestos load emitted in the air ≥ 0.5 gr/hour	

OPERATING & ENVIRONMENTAL MANAGEMENT REGULATION

Activity	Environmental issue	Impact	Criteria-significance					Legal & other requirements	S*	Purpose	Response measure	Indicator (Measured parameter)	Objective
			1*	2*	3*	4*	Requirement						
Productive activity of facilities within the TBP	Emissions of other gaseous pollutants (SO ₂ , NO ₂ , Pb, O ₃ , CO)	Air pollution	H S	H S	LS	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments Council of Ministers Act No 34/2002 (Directive 1999/30/EC) Directive 85/203/EEC JMD 38638/2016/2005 (Directive 2002/3/EC) JMD 9238/332/2004 (Directive 2000/69/EC)	M S	Reducing emissions in the air	Implementation of the measures set out in relevant legislation	Concentration of gaseous pollutants emitted	Within the limits prescribed by law	
Use of industrial boilers (for gaseous, liquid and solid fuels)	Gaseous pollutants (CO ₂ , carbon black, temperature)	Air pollution	M S	M S	LS	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments JMD 11294/1993 JMD 11535/1993	M S	Reducing emissions in the air	Implementation of the measures set out in relevant legislation Proper setup of industrial burners using solid or liquid fuel to ensure proper combustion and that emissions are within the permitted limits.	Concentration of gaseous pollutants emitted	Within the limits prescribed by law	
Operation of fixed furnaces/boilers for heating of buildings and water	Gaseous pollutants (CO ₂ , carbon black, temperature)	Air pollution	LS	LS	M S	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments JMD 10315/1993	LS	Reducing emissions in the air	Implementation of the measures set out in relevant legislation Proper setup and maintenance of burners-boilers	Concentration of gaseous pollutants emitted	Within the limits prescribed by law	
Productive activity of the Large Combustion Plants in the TBP	Gaseous pollutants (SO ₂ , NO _x , particulates)	Air pollution	H S	H S	LS	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments JMD 58751/2370/1993 & JMD 29457/1511/2005	H S	Reducing emissions in the air	Implementation of the measures set out in relevant legislation	Concentration of gaseous pollutants emitted	Within the limits prescribed by law	
Productive activity of establishments emitting VOCs in the TBP	Volatile organic compounds (VOCs)	Air pollution	H S	H S	LS	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments JMD 437/2005/2006	H S	Reducing emissions in the air	Operation of properly designed activated carbon filters to capture any VOC emissions from establishments with associated emissions (alone or together with other neighbouring establishments).	Concentration of emitted VOCs	Within the limits prescribed by law	
Operation of establishments in the TBP, in general	Gaseous pollutants, in general	Air pollution	H S	H S	LS	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments	H S	Reducing emissions in the air	Installation of at least two air pollutants measuring stations in the premises of the Business Park Type B and in the wider region, in consultation with the Environmental Protection Directorate of the Thessaloniki Prefecture.	Concentration of gaseous pollutants emitted	Within the limits prescribed by law	

OPERATING & ENVIRONMENTAL MANAGEMENT REGULATION

Activity	Environmental issue	Impact	Criteria-significance					S*	Purpose	Response measure	Indicator (Measured parameter)	Objective
			1*	2*	3*	Legal & other requirements						
						4*	Requirement					
Productive activity of facilities within the TBP	Odours	Air pollution Odor nuisance	H S	LS	LS	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments	M S	Reducing odours in the air	Avoiding release of odours from the operation of establishments to the environment Ensuring that each establishment within the Business Park Type B takes appropriate measures to mitigate any odours from their operation		

OPERATING & ENVIRONMENTAL MANAGEMENT REGULATION

Activity	Environmental issue	Impact	Criteria-significance					Legal & other requirements	S*	Purpose	Response measure	Indicator (Measured parameter)	Objective
			1*	2*	3*	4*	Requirement						
			Productive activity of facilities within the TBP Activity of contractors/subcontractors in the TBP	Noise	Noise pollution	M S	LS						

OPERATING & ENVIRONMENTAL MANAGEMENT REGULATION

Activity	Environmental issue	Impact	Criteria-significance					Legal & other requirements	S*	Purpose	Response measure	Indicator (Measured parameter)	Objective
			1*	2*	3*	4*	Requirement						
Operation of establishments and staff activities inside the TBP, in general	Water	Consumption of natural resources	LS	LS	H S	YES	JMD Φ/A.6/1/30827/733/2007 JMD 43504/2005 Water usage license ETAD for the establishments JMD ΔΙΠΑΔ/Β/606/12-11-02 Circular 2000/60 E.E	M S	Rational consumption/water management	Implementation of the measures set out in relevant legislation Installing a water meter in the new drilling to record the discharges. Conducting regular measurements of the still water-pumping level using automatic recording meter and of the quality characteristics of water, and listing the results in a special register.	Monthly water consumption in m ³	Reduction	
Storing chemicals inside the TBP, in general	Possible leakage of chemicals	Soil and aquifer pollution	H S	H S	M S	YES	JMD Φ/A.6/1/30827/2733/2007 ETAD for the establishments	H S	Avoiding emergencies Minimising impact	Storing chemicals safely in confined areas. More specifically: <ul style="list-style-type: none"> ▪ appropriate labelling of chemicals, waste and storage space ▪ storage in secure locations under appropriate storage conditions ▪ provision of information to employees on the storage and safe handling of chemicals ▪ providing appropriate materials and instruments for cleaning any spilled chemicals on the floor. ▪ procurement of the necessary first aid equipment. 			

*1: Impact on the local environment *2: Toxicity *3: Impact on natural resources *4: Yes or No *S: Significance

HS: High Significance MS: Medium Significance LS: Low Significance

4. LEGISLATIVE AND OTHER REQUIREMENTS

4.1 Monitoring of legislative requirements relating to the environment

the BPM must systematically monitor, through the Head of Environmental Management, all developments and changes relating to Greek and EU environmental laws and other regulatory texts. The following sources of information are listed:

Greek law, either through the legal information database or another legal source - Greek Government Gazette - Official Journal of the European Union - The Bulletin of the European Union - Various specialised Greek law journals, publications and the daily Press - Internet search - Contacts with ministries and other government bodies

Environmental legislation related to the TBP activity is identified, evaluated, categorised and filed under the responsibility of the Head of Environmental Management. Categorisation of environmental legislation may follow the one used by the European Union, which comprises the following sections: General issues, air pollution, natural environment, noise, solid waste, water management, toxic - hazardous waste, other issues.

The Head of Environmental Management transmits the relevant information to the appropriate staff to be informed and to act appropriately, as well as to the Environmental Committee.

Apart from the BPM, the EUs are also required to be informed and continuously follow the current legal and other requirements concerning their activity in the TBP.

4.2. Monitoring of other requirements relating to the environment

Under the responsibility of the Head of Environmental Management, other requirements relating to environmental protection are systematically monitored, which may arise from:

- operating - exploitation licenses;
- Environmental Impact Studies and the approved environmental conditions;
- consultation with local authorities or other bodies;
- care and effort for optimal implementation of corporate social responsibility;
- agreements with non-governmental organisations;
- public commitments of the TBP;

- potential internal requirements.

4.3. Assessment of compliance with legal requirements relating to the environment

The Head of Environmental Management verifies compliance with laws and other requirements relating to the environment, periodically, using an appropriate checklist where all documents setting out the requirements are listed.

When performing the assessment, the Head of Environmental Management monitors and records the effective date of each document (such as a license), and whether it needs to be renewed. He then verifies compliance with the requirements and, in case where a discrepancy is found, he records his observations or draws a Non-Compliance Report (NCR), when there is a need for corrective-preventive actions (see Section 6).

It should be noted that the Head of Environmental Management is responsible for verifying compliance with legal and other environmental requirements related to the operation of the TBP. The respective employees of the EUs are responsible for assessing compliance and adherence to their environmental conditions.

4.4. Key obligations of the BPM and the EUs in the TBP

Below are listed the key environmental protection obligations of the BPM and the enterprises established/under establishment in the TBP, as set out primarily in the relevant Environmental Terms Approval Decision (JMD Φ/A.6/1/30827/2733/2007), and relevant environmental legislation.

4.4.1. Basic environmental management obligations of the BPM

4.4.1.1. Solid waste management

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/20 07 <i>(para. A.3.3, section a)</i> JMD 50910/2727/2003 JMD 29407/3508/2002	Determination of a secure storage space for industrial waste within the TBP, based on the relevant study and applicable legislation. Implementation of another safe disposal alternative outside the TBP by certified operators.	STUDY IMPLEMENTATION
2	JMD Φ/A.6/1/30827/2733/20 07 <i>(para. A.3.3, section b)</i> JMD 50910/2727/2003	Collection of urban solid waste in large containers and transport to landfills serving the local authorities of the wider locality. Overall responsibility for cleaning the premises of the TBP.	IMPLEMENTATION
3	JMD Φ/A.6/1/30827/2733/20 07 <i>(para. A.3.3, section c)</i> JMD 50910/2727/2003	Obtaining the final solid waste disposal licence by the competent department of the Thessaloniki Prefecture.	LICENSING

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
4	<p>JMD Φ/A.6/1/30827/2733/20 07 <i>(para. A.3.3, section d)</i></p> <p>JMD 50910/2727/2003 Law 2939/2001 JMD 9268/2007</p>	<p>Recycling of solid and recyclable waste and packaging (metals, glass, paper, etc.).</p> <p>Preparation and submission for approval by the competent department of the Ministry of Environment, Energy and Climate Change of a special recyclable waste collection plan and installation of special buckets for the collection of materials by type.</p>	<p>STUDY IMPLEMENTAT ION</p>
5	<p>JMD Φ/A.6/1/30827/2733/20 07 <i>(para. A.3.3, section e)</i></p> <p>JMD 50910/2727/2003 JMD 29407/3508/2002 JMD 22912/1117/2005 PD 82/2004 Regulation 259/1993 JMD ΗΠ 13588/725/2006 JMD ΗΠ 24944/1159/2006 JMD 11535/1993</p>	<p>Collection, transportation, storage and, on the whole, management of solid waste/sludge in accordance with applicable law.</p>	<p>IMPLEMENTAT ION</p>

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
6	<p>JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.3, section g)</i> JMD 50910/2727/2003</p>	<p>Prohibition of any deposition of solid waste at the discharge points of streams and torrents, inside and outside the TBP. Immediate removal of any existing deposits inside or in the perimeter of the TBP.</p>	<p>COMPLIANCE IMPLEMENTATION</p>
7	<p>JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.3, section f)</i> Law 2939/2001 JMD 9268/2007 PD 82/2004 PD 117/2004 PD 15/2006 PD 115/2004 PD 109/2004</p>	<p>Alternative management of packaging and other waste streams according to the provisions in relevant legislation. More specifically:</p> <ul style="list-style-type: none"> ➤ Delivery of collected packaging (metal, glass, paper, etc.) to appropriate licensed contractors for recovery (see point 4). ➤ Collection of waste oils from each plant and delivery, through an appropriate licensed waste collector, to an approved alternative management system for further processing, with priority given to their regeneration. ➤ Collection of end of life electrical and electronic equipment, waste batteries/accumulators and used tires of vehicles, in accordance with the applicable provisions. 	<p>IMPLEMENTATION</p>

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
8	<p>JMD Φ/A.6/1/30827/2733/20 07 <i>(para. A.3.3, section h)</i></p> <p>JMD 50910/2727/2003</p> <p>JMD ΗΠ 13588/725/2006</p> <p>JMD ΗΠ 24944/1159/2006</p>	<p>Development of solid and/or hazardous waste management infrastructure to serve industrial-craft enterprises located therein.</p> <p>Preparation and submission of a specific solid waste management plan to the Directorate for the Control of Air Pollution and Noise (EARTH) of the Ministry of the Environment, Energy and Climate Change (as part of which it will be considered whether there is a need for an additional EIA and modification of the ETAD).</p>	<p>STUDY IMPLEMENTATION</p>

4.4.1.2. Liquid waste management

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	<p>Decision No ΔΥ/22374/91/11-01-1994 of the Prefect of Thessaloniki</p> <p>JMD Φ/A.6/1/30827/2733/2007 (para. A.2.1)</p> <p>Decision No 30/6164/19-09-2006 of the Prefecture of Thessaloniki</p> <p>Circular No A5/950/16-04-1984 of the Ministry of Health, Welfare and Social Security</p>	<p>Discharge in the Thermaic Gulf (through trenches 1-T.9 and 1-T) after adequate treatment in the Central Waste Treatment and Disposal Plant (CWTDTP), with the following allowable limits:</p> <ul style="list-style-type: none"> ▪ pH: 6.0 - 9.5 ▪ BOD₅ ≤ 40 mg/l ▪ SS ≤ 50 mg/l ▪ Temperature ≤ 28 oC ▪ Dissolved oxygen ≥ 3 mg/l ▪ Electric conductivity ≤ 750 μS/cm (20 °C) ▪ Chlorides ≤ 120 mg/l ▪ Floating or precipitating solids, sludge deposition, pectins, oils, fats: No ▪ Other provisions: in accordance with the applicable provisions 	COMPLIANCE
2	<p>JMD Φ/A.6/1/30827/2733/2007 (para. A.3.2, section a)</p>	<p>Proper construction and functioning of KMEDA.</p>	IMPLEMENTATION COMPLIANCE
3	<p>JMD Φ/A.6/1/30827/2733/2007 (para. A.3.2, section b & B.4.3 section b)</p>	<p>Monitoring the overall functioning of the liquid waste management system with the automatic control system, and making appropriate interventions in case of failures.</p> <p>Performing inspections in cooperation with the competent departments</p>	FOLLOW-UP VERIFICATION

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
		(Environmental Protection Directorate of the Thessaloniki Prefecture) for detecting any infringements.	
4	JMD Φ/A.6/1/30827/2733/2007 (para. A.3.2, section c)	Obtaining the final liquid waste disposal licence from the competent departments of the Thessaloniki Prefecture for the entire liquid waste management and disposal system.	LICENSING
5	JMD Φ/A.6/1/30827/2733/2007 (para. A.3.2, section d)	Discharge of industrial waste from KMEDA: 855 m ³ /day	COMPLIANCE
6	JMD Φ/A.6/1/30827/2733/2007 (para. A.3.2, section e)	The CWTDP should include the following steps/operations: <ul style="list-style-type: none"> ▪ screening/desanding/oil collection ▪ pre-aeration-equalisation tank ▪ mechanical separation of solids ▪ flocculation-precipitation ▪ bioselector ▪ biological treatment (aeration) ▪ liquid separation of sludge ▪ discharge measurement ▪ disinfection (chlorination) ▪ sludge digestion ▪ sludge thickening-dewatering 	IMPLEMENTATION
7	JMD Φ/A.6/1/30827/2733/2007 (para. A.3.2, section f)	Collecting screenings, sands and fats on a regular and timely basis, so as to avoid odours and insect outbreaks	IMPLEMENTATION COMPLIANCE
8	JMD Φ/A.6/1/30827/2733/2007	Application of a monitoring system for the operation of KMEDA. In case where a	FOLLOW-UP VERIFICATION

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
	<i>(para. A.3.2, section g)</i>	change in the characteristics of incoming wastewater is found, the necessary adjustments/actions are carried out by qualified personnel.	
9	JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.2, section h)</i>	Developing a specific emergency response plan (e.g. power failure, technical failure, etc.)	STUDY IMPLEMENTATION
10	JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.2, section i)</i>	Keeping a record of sewer manholes (numbers, location, year of manufacture etc.) and inspection and recording of their condition periodically.	FOLLOW-UP VERIFICATION
11	JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.2, section j)</i>	Frequent cleaning of deposits (tartar) on pressure and physical flow ducts. Keeping a registry of repairs, obstructions and other work in the wells and piping of the network.	IMPLEMENTATION
12	JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.2, section k)</i>	Provision of backup equipment to ensure continued and uninterrupted operation of the system.	IMPLEMENTATION
13	Decision No ΔΥ/22374/91/11-01-1994 of the Prefect of Thessaloniki JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.2, section l)</i>	Conducting chemical analyzes (two samples per month minimum) in an appropriate laboratory from KMEDA outflow. Listing of analysis results in a special register certified by the competent Environmental Protection Directorate of the Thessaloniki Prefecture.	FOLLOW-UP VERIFICATION
14	JMD 50910/2727/2003	Conducting regular inspections of the quality of processed sludge discharged	FOLLOW-UP

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
JMD ΗΠ 13588/725/2006 JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.2, section m)</i>	from KMEDA. Verifying classification of waste as hazardous/non-hazardous, depending on the results, and handling waste as appropriate, in accordance with the provisions in relevant legislation.	VERIFICATION	
15 JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.2, section n)</i>	Temporary storage of produced sludge for up to one year	COMPLIANCE	
16 JMD Φ/A.6/1/30827/2733/2007 <i>(para. EA.3.2, section o)</i>	Disposal of sludge by authorised operators, depending on the hazard potential of the material. Proper licensing for carriage of sludge by transportation means of the TBP.	IMPLEMENTATION LICENSING	
17 JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.2, section p)</i>	Notifying promptly the competent environmental departments of the Thessaloniki Prefecture in case of fault or failure of the establishments and reporting the required recovery time. More specifically: ➤ In case of short-term failures, planning the provision of an appropriate number of bypass pipelines with safety valves to channel raw sewage into storage - equalisation tanks until the failure is restored (a few hours). ➤ In case of longer failures, planning the construction of a tank for storing an amount of at least two days.	COMMUNICATION IMPLEMENTATION	

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
18	JMD Φ/A.6/1/30827/2733/2007 (<i>para. B.4.3, section b</i>)	Discharge of industrial wastewater or sewage from establishments operating within the Business Park Type B in open water bodies inside or in contact with it, or in the rainwater network of the TBP, is prohibited. Performing the necessary inspections in cooperation with the Environmental Protection Directorate of the Thessaloniki Prefecture for detecting any infringements.	FOLLOW-UP VERIFICATION

4.4.1.3. Rainwater management

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/2007 (<i>para. A.3.1, section a</i>)	Cleaning and maintenance of the rainwater network (cleaning wells to remove debris or solid waste of any kind) and the bed of the drainage ditches that serve the surface run-off of water, water streams and engineering structures	IMPLEMENTATION FOLLOW-UP VERIFICATION
2	JMD Φ/A.6/1/30827/2733/2007 (<i>para. A.3.2, section b</i>)	Examination/licensing of weak load wastewater discharge (e.g. steam boilers extraction) in the rainwater network from establishments, as long as there are special reasons for doing so.	STUDY IMPLEMENTATION

4.4.1.4. Gaseous pollutants

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.1, section a)</i>	Installation of at least two air pollutants measuring stations in the premises of the TBP and in the wider region, in consultation with the Environmental Protection Directorate of the Thessaloniki Prefecture.	IMPLEMENTATION FOLLOW-UP VERIFICATION

4.4.1.5 Noise

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD 37393/2028/2003 JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.1.1)</i>	Implementation of the provisions contained in relevant legislation	COMPLIANCE
2	Presidential Decree 1180/1981 JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.1.2)</i>	Total sound level in the perimeter of the TBP < 70 dB(A).	COMPLIANCE
3	JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.1, section a)</i>	Noise monitoring stations should be installed inside the TBP	IMPLEMENTATION

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
4	JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.4.2, section b)</i>	Conducting regular noise measurements by the operator of the Business Park Type B inside the boundaries of the establishments. Reporting of the competent departments of cases where the limits allowed are exceeded, and recommending the imposition of additional protection measures and/or administrative penalties.	FOLLOW UP VERIFICATION

4.4.1.6 Water use

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.3.4)</i> JMD 43504/2005 JMD ΔΙΠΑΔ/Β/606/12-11-02	Obtaining a licence from the Directorate for Water of the Region of Central Macedonia to implement a water resources utilisation project for the borehole to be drilled and an industrial water use licence for the existing borehole.	LICENSING
2	JMD Φ/A.6/1/30827/2733/2007 <i>(para. C.1.2, section d-vi)</i>	Installing a water meter in the new drilling to record the discharges. Conducting regular measurements of the still water-pumping level using automatic recording meter, and listing the results in a special register.	FOLLOW UP VERIFICATION

4.4.1.7 Tree planting

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, section c</i>)	<p>Elaboration of a landscaping design along with a special landscape architecture design for all planting in the peripheral and internal vegetation cover of the TBP within one year of the entry into force of the DIEC, according to the recommendations of the Directorate for Forestry and the Forest Service of the Prefecture of Thessaloniki.</p> <p>This design should include as a minimum:</p> <ul style="list-style-type: none"> ➤ planting of trees and shrubs in the vicinity; ➤ planting in clusters or individually, with a planting arrangement of 3x3m or 3x2m; ➤ carrying out the necessary work for the growth of plants, such as irrigation (using a drop irrigation system for water economy), fertilising and hoeing for at least three years. Success rate of plantings at least 80% and repetition of failed plantings. Origin of the required irrigation water from the used boreholes or other sources, and calculation alongside water from the supply system to serve the TBP needs. ➤ Protection of vegetation cover with suitable fencing 	STUDY IMPLEMENTATION
2	JMD Φ/A.6/1/30827/2733/2007	Peripheral vegetation cover of the Business Park Type B with trees and	IMPLEMENTATION

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
	<i>(para. D, section d)</i>	bushes, in a 2:1 ratio and at a depth of at least three rows.	
3	JMD Φ/A.6/1/30827/2733/2007 <i>(para. D, section e)</i>	<p>Development, as far as possible, of all planned green areas in the TBP giving priority to the boundaries adjoining residential areas.</p> <p>Examination of the possibility of creating a plant nursery in the proper position within the green areas, to serve the TBP needs.</p> <p>Planting of trees and shrubs with a density, number of rows and planting arrangement as set out in the landscaping design, around each block, with priority to those where industrial/craft enterprises are operating,</p>	IMPLEMENTATION

4.4.1.8 Other obligations

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, section h</i>)	Making sure that SMEs are grouped, as far as possible, by similar activities, so as to facilitate the joint installation of pollution control systems, where these are required.	ORGANISATION
2	JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, section l</i>)	Determining appropriate scientific personnel to monitor the proper implementation of the ETAD	ORGANISATION
3	JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, section m</i>)	Storing chemicals safely in confined areas. More specifically: <ul style="list-style-type: none"> ▪ isolation of incompatible chemicals; ▪ appropriate labelling of chemicals, waste and storage space ▪ storage in secure locations under appropriate storage conditions ▪ provision of information to employees on the storage and safe handling of chemicals ▪ providing appropriate materials and instruments for cleaning any spilled chemicals on the floor. ▪ procurement of the necessary first aid equipment. 	IMPLEMENTATION COMPLIANCE
4	JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, sections n & s</i>)	Obtaining all required licences provided for by applicable law	LICENSING

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
5	JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, section o</i>)	Drafting a special regulation which shall explicitly include, <i>inter alia</i> , the general environmental protection obligations of the establishments within the Business Park Type B	STUDY (this Regulation)
6	JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, section p</i>)	Creating an environmental record for all industrial/crafts enterprises operating within the Business Park Type B, to monitor and to control any air, soil and water pollution caused by each one of them individually, by recording data referring to the quantity and quality of liquid and solid waste	FOLLOW-UP VERIFICATION

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
7	JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, section q</i>)	<p>Submission of a detailed annual report on the implementation of the ETAD to the Environmental Protection Directorate of the Thessaloniki Prefecture within the first two months of each year. The report shall include at least the following:</p> <ul style="list-style-type: none"> ▪ any licences issued for the operation of the TBP; ▪ Data on water use (origin, destination, quantities, etc.), electricity, fuel, etc. ▪ Data on sewage treatment (origin, quality, quantity, etc.) ▪ Data from the air/environment quality monitoring network ▪ Accidents and adverse environmental events ▪ Environmental restoration operations ▪ Environmental management methods applied ▪ Cost of environmental protection measures 	REPORT

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
8	JMD Φ/A.6/1/30827/2733/2007 <i>(para. D, section r)</i>	As part of mutual social responsibility requirements, existence of: <ul style="list-style-type: none"> ▪ communication with the public ▪ system for information and availability of data ▪ recording and managing complaints from organisations and individual residents of the greater area ▪ charitable and other activities that serve the common good of the local community 	COMMUNICATION
9	JMD Φ/A.6/1/30827/2733/2007 <i>(Article 6, section a)</i> JMD ΗΠ 11014/703/Φ104	Submission of a file every five years in order to assess whether revision of the ETAD is required	LICENSING
10	JMD Φ/A.6/1/30827/2733/2007 <i>(para. D, section b)</i>	Contact with dispersed establishments and activities in Thessaloniki causing significant environmental problems to examine the possibility of establishment within the TBP, depending on availability of land.	COMMUNICATION

4.4.2 Key environmental management obligations of the industrial and craft enterprises in the TBP

4.4.2.1 Solid waste management

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	<p>JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.4.4, which refers to para. A.3.2 m, n, o & para. A.3.3)</i></p> <p>ETAD for the establishments</p> <p>JMD 50910/2727/2003</p> <p>JMD 29407/3508/2002</p> <p>JMD 22912/1117/2005</p> <p>PD 82/2004</p> <p>Regulation 259/1993</p> <p>JMD ΗΠ 13588/725/2006</p> <p>JMD ΗΠ 24944/1159/2006</p> <p>JMD 11535/1993</p>	<p>Collection, transportation, storage and, on the whole, management of solid waste/sludge in accordance with applicable law.</p>	<p>IMPLEMENTATION</p>

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
2	<p>JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.4.4, which refers to para. A.3.2 m, n, o & para. A.3.3)</i></p> <p>ETAD for the establishments JMD 50910/2727/2003</p>	<p>Collection of urban type solid waste in large containers</p>	IMPLEMENTATION
3	<p>JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.4.4, which refers to para. A.3.2 m, n, o & para. A.3.3)</i></p> <p>ETAD for the establishments Law 2939/2001 JMD 9268/2007</p>	<p>Recycling of solid and recyclable waste and packaging (metals, glass, paper, etc.).</p>	IMPLEMENTATION
4	<p>JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.4.4, which refers to para. A.3.2 m, n, o & para. A.3.3)</i></p> <p>ETAD for the establishments JMD 50910/2727/2003</p>	<p>Prohibition of any deposition of solid waste at the discharge points of streams and torrents, inside and outside the TBP.</p>	COMPLIANCE

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
5	<p>JMD Φ/A.6/1/30827/2733/2007 (<i>para. B.4.4, which refers to para. A.3.2 m, n, o & para. A.3.3</i>)</p> <p>ETAD for the establishments</p> <p>Law 2939/2001</p> <p>JMD 9268/2007</p> <p>PD 82/2004</p> <p>PD 117/2004</p> <p>PD 15/2006</p> <p>PD 115/2004</p> <p>PD 109/2004</p>	<p>Alternative management of packaging and other waste streams according to the provisions in relevant legislation. More specifically:</p> <ul style="list-style-type: none"> ➤ Delivery of collected packaging (metal, glass, paper, etc.) to appropriate licensed contractors for recovery (see point 3). ➤ Collection of waste oils and delivery thereof, through an appropriate licensed waste collector, to an approved alternative management system for further processing, with priority given to regeneration. ➤ Collection of end of life electrical and electronic equipment, waste batteries/accumulators and used tires of vehicles, in accordance with the provisions of applicable law. 	IMPLEMENTATION
6	<p>JMD Φ/A.6/1/30827/2733/2007 (<i>para. B.4.3, section c</i>)</p> <p>ETAD for the establishments</p> <p>JMD 98012/2001/1996</p>	<p>Management of waste oil deriving from changes of engine oil, taking care of each facility and in accordance with the procedures laid down by relevant legislation.</p> <p>The uncontrolled discharge into the environment or with any other waste from the plant, is prohibited.</p> <p>(see also point 2)</p>	IMPLEMENTATION COMPLIANCE

4.4.2.2 Liquid waste management

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
JMD Φ/A.6/1/30827/2733/20 07 ETAD for the establishments Decision No ΔΥ/22374/91/11-01- 1994 of the Prefect of Thessaloniki		<p>Drainage of industrial waste and urban wastewater from all types of industrial-manufacturing plants in the liquid waste (sewage) collection network of the TBP.</p> <p>The above will be carried out with the permission of the operator of the Business Park Type B and under the conditions established by the operator and listed in the approved study on the treatment and disposal of waste that every industrial/crafts enterprise should have. This requires the construction of wells connecting each establishment with the wastewater (sewerage) collection system of the Business Park Type B for monitoring the quality of wastewater.</p> <p>Pretreatment of liquid waste (e.g. methodology to retain sediment using a sand separator, method of removing grease and oil using a grease separator or DAF, possible chemical precipitation to remove heavy metals, removal of cyanide, hexavalent chromium, any biological step, etc.), where appropriate, before disposal into the network.</p>	IMPLEMENTAT ION COMPLIANCE

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
2	Specifications of KMEDA manufacturer	<p>The thresholds of the physicochemical and biological characteristics of the wastewater coming from the establishments and may enter the CWTDP for processing, without causing any sort of problem, are the following:</p> <ul style="list-style-type: none"> ➤ Temperature $\leq 28^{\circ} \text{C}$ ➤ pH: 6-9 ➤ BOD₅ $\leq 500 \text{ mg/l}$ ➤ COD $\leq 1000 \text{ mg/l}$ ➤ Suspended solids (SS) $\leq 500 \text{ mg/l}$ ➤ Fats-oils (of animal/vegetable origin) $\leq 40 \text{ mg/l}$ ➤ Fats-oils (of synthetic/mineral origin) $\leq 15 \text{ mg/l}$ ➤ Detergents (80% biodegradable) $\leq 20 \text{ mg/l}$ ➤ Ammonia $\leq 25 \text{ mg/l}$ ➤ Nitrites $\leq 4 \text{ mg/l}$ ➤ Nitrates $\leq 20 \text{ mg/l}$ ➤ Phosphates (P) $\leq 10 \text{ mg/l}$ ➤ Total sulphites (SO₃) $\leq 1 \text{ mg/l}$ ➤ Total sulphates (SO₄) $\leq 500 \text{ mg/l}$ ➤ Total hydrogen sulfide (H₂S) $\leq 1 \text{ mg/l}$ ➤ Cyanides (CN) $\leq 0.1 \text{ mg/l}$ ➤ Arsenic $\leq 0.5 \text{ mg/l}$ ➤ Chromium (III) $\leq 1 \text{ mg/l}$ ➤ Chromium (VI) $\leq 0.2 \text{ mg/l}$ ➤ Copper (Cu) $\leq 0.2 \text{ mg/l}$ ➤ Zinc $\leq 20.5 \text{ mg/l}$ ➤ Iron $\leq 2 \text{ mg/l}$ ➤ Aluminium $\leq 1 \text{ mg/l}$ ➤ Nickel $\leq 0.5 \text{ mg/l}$ ➤ Mercury $\leq 0.01 \text{ mg/l}$ ➤ Cobalt $\leq 2 \text{ mg/l}$ ➤ Cadmium $\leq 0.05 \text{ mg/l}$ ➤ Antimony $\leq 0.5 \text{ mg/l}$ ➤ Barium $\leq 2 \text{ mg/l}$ ➤ Beryllium $\leq 2 \text{ mg/l}$ ➤ Boron $\leq 2 \text{ mg/l}$ ➤ Bromine $\leq 1 \text{ mg/l}$ ➤ Fluorine $\leq 2 \text{ mg/l}$ ➤ Manganese $\leq 1 \text{ mg/l}$ ➤ Molybdenum $\leq 2 \text{ mg/l}$ ➤ Silver $\leq 0.5 \text{ mg/l}$ ➤ Tin $\leq 1 \text{ mg/l}$ ➤ Titanium $\leq 2 \text{ mg/l}$ ➤ Lead $\leq 0.5 \text{ mg/l}$ ➤ Phenols $\leq 0.5 \text{ mg/l}$ ➤ Precipitating solids $\leq 10 \text{ mg/l}$ ➤ 	COMPLIANCE

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
3	<p>JMD Φ/A.6/1/30827/2733/20 07 <i>(para. B.4.3, sections a and b)</i></p> <p>ETAD for the establishments</p>	<p>Discharge of sludge with liquid waste is not allowed.</p> <p>Discharge of industrial wastewater or sewage from establishments operating within the Business Park Type B in open water bodies inside or in contact with it, or in the rainwater network of the Business Park Type B, is prohibited.</p>	COMPLIANCE
4	<p>JMD Φ/A.6/1/30827/2733/20 07 <i>(para. B.4.3, section d)</i></p> <p>ETAD for the establishments</p>	<p>Conducting laboratory analyses for each establishment discharging liquid waste at least once a month, unless otherwise described in its operating licence, to verify the characteristics and discharge of liquid waste.</p> <p>Listing the results in a special register certified by the competent prefectural department, which must be available and be presented at each inspection by the competent inspection authorities, if requested.</p>	FOLLOW UP VERIFICATION
5	<p>JMD Φ/A.6/1/30827/2733/20 07 <i>(para. B.4.4, which refers to para. A.3.2 m, n, o & para. A.3.3)</i></p> <p>ETAD for the establishments</p> <p>JMD 50910/2727/2003</p> <p>JMD ΗΠ</p>	<p>The treated sludge will be subject to regular quality controls.</p> <p>Verifying classification of waste as hazardous/non-hazardous, depending on the results, and handling waste as appropriate, in accordance with the provisions in relevant legislation.</p>	FOLLOW UP VERIFICATION

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
	13588/725/2006		
6	<p>JMD Φ/A.6/1/30827/2733/20 07</p> <p><i>(para. B.4.4, which refers to para. A.3.2 m, n, o & para. A.3.3)</i></p>	<p>Temporary storage of produced sludge for up to one year</p>	COMPLIANCE
	ETAD for the establishments		
7	<p>JMD Φ/A.6/1/30827/2733/20 07</p> <p><i>(para. B.4.4, which refers to para. A.3.2 m, n, o & para. A.3.3)</i></p>	<p>Disposal of sludge by authorised operators, depending on the hazard potential of the material.</p>	<p>IMPLEMENTAT ION COMPLIANCE</p>
	ETAD for the establishments		

4.4.2.3 Rainwater management

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.4.3, section e)</i> ETAD for the establishments	Discharge of rainwater from each establishment in the rainwater network of the TBP. Exceptionally, weak load wastewater discharge (e.g. steam boilers extraction) in this network is allowed only with the permission of the TBP operator and as long as there are special reasons for doing so.	IMPLEMENTATION LICENSING

4.4.2.4 Gaseous pollutants

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.1.1)</i> ETAD for the establishments PD 1180/1981	Maximum allowable limit of particulate emissions: 100 mg/Nm ³	COMPLIANCE
2	JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.1.2)</i> ETAD for the establishments JMD 8243/1113/1991	Asbestos emissions ≤ 0.1 mg/Nm ³ for discharged flue gases ≥ 5000 m ³ and asbestos load emitted in the air ≥ 0.5 gr/hour	COMPLIANCE

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
3	JMD Φ/A.6/1/30827/2733/2007 (<i>para. B.1.3</i>)	Other gaseous pollutants: according to what is stated in Presidential Decree 1180/1981	COMPLIANCE
	ETAD for the establishments PD 1180/1981		
4	JMD Φ/A.6/1/30827/2733/2007 (<i>para. B.1.4</i>)	Concerning the use of industrial boilers (gaseous, liquid and solid fuels), the provisions of relevant legislation shall apply	COMPLIANCE
	ETAD for the establishments JMD 11294/1993 JMD 11535/1993		
5	JMD Φ/A.6/1/30827/2733/2007 (<i>para. B.1.5</i>)	Concerning Large Combustion Plants (LCPs), the provisions of relevant legislation shall apply	COMPLIANCE
	ETAD for the establishments JMD 58751/2370/1993 & JMD 29457/1511/2005		

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
6	<p>JMD Φ/A.6/1/30827/2733/2007 (<i>para. B.1.6 and B.4.1, section c</i>)</p> <p>ETAD for the establishments</p>	<p>Avoiding release of odours from the operation of establishments to the environment</p> <p>Ensuring that each establishment within the Business Park Type B takes appropriate measures to mitigate any odours from their operation</p>	COMPLIANCE
7	<p>JMD Φ/A.6/1/30827/2733/2007 (<i>para. B.2.1</i>)</p> <p>ETAD for the establishments</p> <p>Council of Ministers Act No 34/2002 (Directive 1999/30/EC)</p> <p>Directive 85/203/EEC</p> <p>JMD 38638/2016/2005 (Directive 2002/3/EC)</p> <p>JMD 9238/332/2004 (Directive 2000/69/EC)</p>	<p>Emissions to air:</p> <p>Emissions of sulphur dioxide (SO₂), particulate matter (PM₁₀), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃) and carbon monoxide (CO), as set out in relevant legislation.</p>	COMPLIANCE
8	<p>JMD Φ/A.6/1/30827/2733/2007 (<i>para. B.4.1, section a</i>)</p> <p>ETAD for the establishments</p> <p>Operation license of facilities</p>	<p>Operation of systems for removing dust, smoke and other special gaseous pollutants in all the establishments, where required under applicable legislation and the relevant licence (ETAD, operating licence)</p>	IMPLEMENTATION

No	LEGISLATIVE & OTHER REQUIREMENTS	OBLIGATIONS	ACTION
9	<p>JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.4.1, section b)</i></p> <p>ETAD for the establishments</p>	<p>Operation of properly designed activated carbon filters to capture any VOC emissions from establishments with associated emissions (alone or together with other neighbouring establishments).</p>	IMPLEMENTATION
10	<p>JMD Φ/A.6/1/30827/2733/2007 <i>(para. A.4.1, section f)</i></p> <p>ETAD for the establishments</p>	<p>Taking appropriate measures to address the dust emissions from establishments with associated emissions (e.g. from aggregates):</p> <ul style="list-style-type: none"> ▪ in storage areas (e.g. indoor facilities, wetting systems) ▪ in the material handling areas (e.g. covered transport trucks) 	IMPLEMENTATION
11	<p>JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.4.1, section g)</i></p> <p>ETAD for the establishments</p>	<p>Proper setup of industrial burners that use solid fuel (e.g., pomace wood) or fuel oil to ensure proper combustion and that emissions are within the permitted limits.</p>	IMPLEMENTATION

4.4.2.5 Noise

No	LEGISLATIVE REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.3.1)</i> ETAD for the establishments JMD 37393/2028/2003	Implementation of the provisions contained in relevant legislation	IMPLEMENTATION COMPLIANCE
2	JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.3.2 & B.4.2 section b)</i> ETAD for the establishments Presidential Decree 1180/1981	Noise level from the operation of installed plants ≤ 70 dB(A) measured at the boundaries of the plot of each establishment. Total sound level in the perimeter of the Business Park Type B < 70 dB(A), similarly.	COMPLIANCE
3	JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.4.2, section a)</i> ETAD for the establishments	Housing enterprises engaged in noisy activities inside buildings with adequate insulation. Placing of machinery producing high noise (e.g. compressors) or vibrations (e.g. presses) inside appropriate soundproof cages or on anti-vibration floor, respectively.	IMPLEMENTATION

4.4.2.6 Tree planting

No	LEGISLATIVE REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/2007 <i>(para. B.4.2, section c)</i>	Proper development of a green zone around the plot of every industrial/crafts enterprise.	IMPLEMENTATION
	ETAD for the establishments		

4.4.2.7 Other obligations

No	LEGISLATIVE REQUIREMENTS	OBLIGATIONS	ACTION
1	JMD Φ/A.6/1/30827/2733/2007 <i>(para. D, section g)</i>	The plants to be installed within the Business Park Type B must first have obtained an ETAD in accordance with relevant legislation, stating the specific obligations and environmental protection measures that they must observe.	LICENSING
	ETAD for the establishments Law 3010/2002 JMD 69269/538/1990		
2	JMD Φ/A.6/1/30827/2733/2007 <i>(para. D, section i)</i>	Consideration of the alternative to use natural gas for existing and newly established plants	STUDY IMPLEMENTATION
	ETAD for the establishments		

No	LEGISLATIVE REQUIREMENTS	OBLIGATIONS	ACTION
3	<p>JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, section j</i>)</p> <p>ETAD for the establishments JMD 10315/1993</p>	<p>Concerning space heating boilers, the provisions of relevant legislation shall apply</p>	<p>IMPLEMENTATION COMPLIANCE</p>
4	<p>JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, section k</i>)</p> <p>ETAD for the establishments</p>	<p>It is desirable to adopt clean technologies and techniques in the production process of industrial and crafts enterprises to be established, and techniques for recycling or energy recovery, where economically and operationally feasible.</p>	<p>IMPLEMENTATION</p>
5	<p>JMD Φ/A.6/1/30827/2733/2007 (<i>para. D, section m</i>)</p> <p>ETAD for the establishments</p>	<p>Storing chemicals safely in confined areas. More specifically:</p> <ul style="list-style-type: none"> ▪ isolation of incompatible chemicals; ▪ appropriate labelling of chemicals, waste and storage space ▪ storage in secure locations under appropriate storage conditions ▪ provision of information to employees on the storage and safe handling of chemicals ▪ providing appropriate materials and instruments for cleaning any spilled chemicals on the floor. ▪ procurement of the necessary first aid equipment. 	<p>IMPLEMENTATION COMPLIANCE</p>

5. FOLLOW UP AND VERIFICATION

5.1. General

the BPM monitors the key characteristics of the operations and activities carried out in the TBP and may have an impact on the environment. This Regulation addresses the activities within the TBP that may have an environmental impact, presents a table on environmental issues, lists the effects on the environment and sets the environmental objectives relevant to each issue, which will be updated and will be subject to review by the BPM through the Head of Environmental Management, in cooperation with the Environmental Committee, where necessary.

To monitor the correct function and performance in terms of the TBP environmental management, appropriate qualitative and quantitative indicators are defined, monitored, processed and reviewed.

The key environmental indicators related to the TBP environmental management mainly result from the legislative requirements and are described in detail by activity and environmental issue in section 3.

All activities of the TBP are inspected with respect to their environmental impact as part of the internal audits and are reviewed at the regular meetings of the Environmental Committee.

Moreover, the environmental management measuring equipment of the TBP, whenever required (e.g. for monitoring air emissions) should be checked, maintained and calibrated regularly so that measurement results be reliable and give the true picture of the operations carried out.

5.2. Inspections

Appropriate inspections are conducted to determine the effective functioning of the TBP environmental management procedures. Inspections include:

- internal inspections, when performed by an authorised officer of the BPM or expert contractors
- inspections by third parties, when performed by external bodies (mainly competent inspection authorities/agencies)

The Head of Environmental Management has the overall responsibility for monitoring the proper implementation of the Environmental Management Regulation and undertakes, to that end, the preparation of internal inspections. Internal inspections are scheduled annually and are recorded appropriately, while informing the officers in charge of the operations that will be inspected.

In terms of programming, internal inspections are separated into:

- ordinary, which are scheduled internal inspections carried out in the TBP
- extraordinary, which are carried out on an unplanned basis when there is a specific problem or change that creates suspicions of improper implementation of the Environmental Management Regulation.

In carrying out inspections, it is desirable to use appropriate forms for recording the results, which will be filed by the Head of Environmental Management. If non-conformities are found, the procedure described in Section 6 shall apply.

In case of inspections carried out by third parties (e.g. competent inspection departments), the Head of Environmental Management notifies the appropriate personnel of the inspection, accompanies the inspector and records his observations. If serious observations are made, the Head of Environmental Management prepares a non-compliance report (NCR), as described in Section 6.

5.3. Specific follow up/verification obligations of the BPM as part of the follow up and verification of the operations aimed at ensuring environmental protection. As set out in the relevant legislative requirements (see Section 4), the BPM is responsible for:

LIQUID WASTES

- Monitoring the overall functioning of the liquid waste management system, by making appropriate interventions in case of failures.
- Ensuring that the Automatic Monitoring and Control System for the operation of KMEDA is applied. The automatic control system detects faults and produces alarms for the responsible operator of the facility to intervene. In case where a change is found in the characteristics of incoming sewage or in the performance of a specific

operation stage, the necessary adjustments/actions should be performed by qualified personnel.

- Keeping a record of sewer manholes (numbers, location, year of manufacture etc.) and inspecting and recording its condition periodically.
- Ensuring that regular checks are performed and a relevant record of repairs, obstructions and other work in the wells and piping of the network, is kept.
- Conducting chemical analyzes (two samples per month minimum) in an appropriate laboratory from KMEDA outflow. Listing of analysis results in a special register certified by the competent Environmental Protection Directorate of the Thessaloniki Prefecture.
- Performing regular checks on the quality of the processed sludge removed from KMEDA (at least twice a year), so that it is classified, depending on the results, as hazardous/non-hazardous, and handling it as appropriate, in accordance with the provisions set out in relevant legislation.
- Performing the necessary checks in cooperation with the Environmental Protection Directorate of the Thessaloniki Prefecture to identify any infringements relating to the discharge of industrial wastewater and sewage from the plants operating within the TBP in open water bodies within or in contact with it or in the rainwater network of the TBP.

GAS EMISSIONS

- Monitoring gas emissions from at least two air pollutant measuring stations in the TBP and the wider area

NOISE

- Monitoring noise levels at the noise measurement stations
- Conducting regular noise measurements at the boundaries of establishments and in the perimeter of the TBP.

WATER MANAGEMENT

- Recording water supplies from drilling wells and performing regular still water-pumping level measurements with automatic recording meters and listing the results in a special register. Performing periodic analyzes of drilling water (once a month). The above method of monitoring the quantity and quality of water may also be applied in cases where other sources of water are used.

OTHER OBLIGATIONS

- Creating an environmental record for all industrial/crafts enterprises operating within the TBP, to monitor and to control any air, soil and water pollution caused by each one of them individually, by recording data referring to the quantity and quality of liquid and solid waste
- Recording and addressing any grievances/complaints from entities and individual residents of the wider area

5.4. Specific follow up/verification obligations of the EUs in the TBP

As set out in the relevant legal provisions (see Section 4), all industrial and craft undertakings which have been, or are currently being, established in the TBP (established undertakings - EUs), are required:

- to fulfil all specific follow-up and verification obligations concerning the environmental and other aspects referred to in the Environmental Terms Approval Decisions, and other, where appropriate, legal provisions governing the operation of each establishment;
- to cooperate with and to facilitate the BPM during inspections on environmental aspects related to their activity;
- to inform the BPM immediately (within 24 hours) of any problem/failure detected in relation to the environmental management of their operations;

- to provide the BPM, promptly and accurately, with all the information and data required on the quantity and quality of solid, liquid and gaseous waste they produce in carrying out their operations;
- to designate a duly authorised officer who will be the contact with the BPM on environmental issues.

More specifically,

LIQUID WASTES

- Conducting laboratory analyses, if they have liquid waste, at least once a month, unless otherwise described in their operating licence, to verify the characteristics and discharge of liquid waste. Listing the results in a special register certified by the competent prefectural department, which must be available and be presented at each inspection by the competent inspection authorities, if requested.

GAS EMISSIONS

- Monitoring greenhouse gas emissions and disposing of the appropriate measuring systems or conducting regular measurements in cooperating with appropriate certified third parties, if so provided for by the ETAD and relevant legislation.

NOISE

- Cooperating with the BPM for conducting regular noise measurements within the boundaries of their plot.

6. NON-CONFORMITIES / CORRECTIVE AND PREVENTIVE ACTIONS

Although, all necessary steps are taken by the BPM to properly apply the Environmental Management Regulation and to ensure that the obligations of the EUs in the TBP with respect to the protection of the environment, are met, as described therein, it may not be excluded that problems arise due to non-conformities.

6.1. Non-conformities

Generally speaking, *non-conformity* means the non-satisfaction of the stated requirements. Specifically, according to the Environmental Management Regulation, non-conformity means any deviation identified as regards the following:

- failure to implement or misapplication of the reported sound environmental management obligations by the EUs in the TBP,
- failure to comply with the legal and other requirements that govern the operation of the TBP,
- failure to meet the defined environmental objectives and targets.

In serious cases where it is required to record and monitor the effects of a non-conformity, the appropriate form can be used (Non-Compliance Report - NCR).

A non-conformity report may be submitted by the person who identifies the non-conformity or, if he is a person outside the TBP, the Head of Environmental Management.

6.2. Actions to be taken when identifying a non-conformity

All the aspects related to the non-conformity must be listed in the non-conformity report, and any evidence must be enclosed therein.

The description must mention:

- the operation in which the non-conformity was identified;
- the problem associated with the non-conformity;
- any other relevant information at the author's discretion.

The author of a non-conformity report, whether from the BPM or from the TBP, after having filled in the report and specified its recipient, informs the Head of Environmental Management, who follows up its progress.

The non-conformity report is forwarded to the recipient, who after examining the problem and exploring its causes, proposes the corrective and/or preventive actions to be taken to resolve the problem and prevent its recurrence. If necessary, the recipient contacts the appropriate officers or

staff. Then, the recipient fills in the time in which he estimates or seeks that the corrective - preventive actions be completed, as well as the person responsible for their implementation.

Then, the non-conformity report is sent to the person responsible for its implementation, who after considering the suggested corrective-preventive actions, implements them in the way shown in the non-conformity report or otherwise. After the actions are implemented, he lists them along with their results on the same form.

Finally, the report is delivered to the Head of Environmental Management, who verifies/ confirms completion and effectiveness of the corrective/preventive actions. If his findings are negative, he may complete a new non-conformity report. A record of non-conformity reports is kept under the responsibility of the Head of Environmental Management.

It should be noted that in case a non-conformity is identified with respect to a specific EU, the operator of the undertaking is responsible to inform the BPM through the Head of Environmental Management, to draft the relevant report and to take corrective actions.

6.3. Corrective-Preventive actions

A corrective-preventive action is one taken to resolve a problem and to avoid its recurrence.

Corrective are considered to be the actions taken immediately and are necessary to remedy disorders occurring during the implementation of the environmental management regulation.

Preventive are considered to be the actions taken to prevent potential future problems or to meet a number of specific corrective actions that have not yielded any results.

Preventive actions can also be implemented, regardless of the occurrence of non-conformities in order to effectively implement the Environmental Management Regulation.

Such actions may be determined, without limitation, based on the following:

- a detailed examination of the working and monitoring ways and methods;
- the results of internal inspections;
- a review the Environmental Management Regulation;
- a review of environmental records;

- external communication;
- staff training problems, etc.

Any requests, suggestions or proposals from TBP employees for improving the functioning of the Environmental Management Regulation, may also be considered preventive actions, if aimed at minimising possible future non-conformities.

6.4. Further actions

In the extreme case of major environmental problems, which for some reason cannot be resolved internally following the above described procedure (non-conformities/ corrective-preventive actions) and that give rise to substantial penalties for the TBP, the BPM is required to inform in writing the competent inspection department, which will then take appropriate action.

To this end, the Head of Environmental Management of the BPM keeps an endorsed record of significant environmental incidents, where the major non-conformities concerning violations of environmental management legislation are entered under a specific registry number. This record should be at all times available to the competent authorities for examination and for their information.

Moreover, in case of a significant environmental violation which can also mean a financial loss for the TBP and/or cause trouble in the proper functioning of the TBP, and if the violator fails to comply with the recommendations of the BPM, the BPM itself may proceed:

- to the remedy of the violation at the violator's expense;
- to impose the measure of temporary closure of the violator's undertaking until the latter demonstrates compliance;

It is clarified that the above measures may be imposed in addition to any penalties and other liability incurred by the violator under applicable law.

7. PREPAREDNESS AND RESPONSE TO EMERGENCIES

With the cooperation of the BPM and the EUs in the TBP, appropriate Emergency Plans should be developed and implemented, where necessary, to effectively address any emergencies. Emergencies are cases in which an undesirable event occurs that causes significant adverse effects on the environment and/or human health and/or the assets of the BPM.

7.1 Emergencies

The BPM, in cooperation with the EUs, must examine the operations carried out in the TBP to identify cases which may lead to situations that could possibly:

- cause accidents or events that could adversely affect the environment;
- affect the normal operation of the TBP;
- cause intervention of various State and local agencies;
- damage the public image and reputation of the TBP, and BPDC or the BPM.

The cases identified as above are characterised as emergencies.

Emergencies with respect to the operation of the TBP may include, depending on the extent of the incident, the following cases:

- industrial accidents (within the EUs);
- natural disasters (earthquake, flood, etc.);
- road accidents;
- accidents in infrastructure and networks;
- extraneous accidents;
- terrorist acts.

Note that these accidents can take various forms, such as fire, explosion, leakage of chemicals/fuel, failure/shutdown of anti-pollution systems (e.g. due to hardware failure, technical failure, power failure), etc.

7.2 Emergency plans

Emergency Plan is defined as a set of predefined and duly prepared actions to prevent, address and manage an emergency and its consequences.

The preparation of the Plan may be delegated to a qualified member of the BPM, the EUs or a contractor of the BPM or the EUs, as appropriate, who cooperates with the respective competent officers to establish the means and actions necessary for its implementation, staff training requirements, etc. The Plan must determine the strategy to be followed and the objectives that need to be achieved in order to minimise both the duration and the impact of the event. This strategy forms the basis to determine the modalities and the general coordinator of each Plan, including the person responsible for the various actions.

The Plans also lay down the actions to be taken in cases of different types of events and information on hazardous materials and their impacts in case of leakage/escape.

The relevant EU is responsible for preparing and implementing appropriate Emergency Plans concerning its operating and response procedures based on the ETAD and applicable legislation. It is clarified that the specific obligations of the EUs in the TBP to prepare Emergency Plans depend on the type, activity and risk of each one of them.

In any case, each EU established within the TBP must submit to the BPM, in addition to the relevant Fire Protection Design, the Emergency Plans concerning its operation that it should have prepared, and notify it of any changes that may be brought to these plans in the future. These Plans should at least specify in a clear and comprehensible way the remedial measures/actions, the response process (persons in charge, replacements, etc.), and the degree of involvement of the BPM.

The Emergency Plans should describe each action and determine:

- the time in which the action should be completed;
- the person responsible for the action;
- the contact person with the BPM and everyone involved;
- expected results;

The Emergency Plans (EPs) must stipulate that in case of an emergency, the EUs established in the TBP must first notify the BPM. Moreover, the Plans must set out the way to notify staff and other persons involved of the events.

The EPs must also provide for the possibility and methods of communication with public authorities (both from central and local government) and designate the corresponding persons in charge from the BPM and the EUs.

Proper training of staff, who should know who to contact and how to perform the predetermined tasks, is crucial for the proper implementation of each Plan.

After finalisation and approval of each Plan, a training course should be offered to the persons involved in the Plan (see Section 9).

7.3 Emergency events

In the event of an emergency, the relevant Plan, drawn up on the basis of the principles mentioned above, should be applied with the utmost accuracy and speed (depending on the circumstances).

Where emergency events occur within the TBP (e.g. industrial accidents), the EUs are themselves directly responsible for addressing them, with the help and assistance of the BPM, to the extent this is possible and/or required by law or the authorities and according to the procedures set up to implement any decisions made by the BoD of the BPM.

Where an emergency event occurs within the scope/area of responsibility of the BPM, the BPM will be directly responsible for addressing it, assisted by the EUs to the extent possible, and/or and as required by law or the Authorities.

In all cases, the overall responsibility for coordinating the implementation of Emergency Plans is borne by the person in charge for addressing emergencies.

7.4. Review of Emergency Plans

After an emergency is addressed and the TBP resumes normal operation, the officer in charge of the overall coordination lists in a special record the events and all relevant information, and informs the BPM.

Then, the Environmental Committee of the TBP is convened to examine the facts and to determine whether the event was addressed effectively. When the Committee is convened, the officer in charge informs its members and, after taking stock of the results, the Contingency Plan is discussed again and, if necessary, a file containing improvements in the approach of treatment is attached therein.

7.5 Emergency preparedness drills and review of Emergency Plans

The officers in charge of the EUs, in consultation with the BPM, shall periodically examine the preparedness of staff to deal with emergencies by conducting drills to test the relevant Plan and to verify its effectiveness. The results shall be commented on, and shall be listed by the officer in charge in a special record. In case of unsatisfactory results or failure of the Plan, the latter should be revised.

The responsibility for the periodic review of Emergency Plans lies with the operators of the EUs, according to the ETAD of the facilities and applicable legislation. Should the need arise for any changes or modifications, the BPM should first be informed to provide its opinion.

8. DOCUMENTATION/CONTROL OF DOCUMENTS

8.1 Categories of documents

Written documentation, i.e. all printed material that is part of the daily operation of the TBP, and related to environmental management, includes:

- Documents of permanent nature (or reviewed infrequently), having a regulatory status and provide guidance to staff in the various activities related to environmental management. These documents essentially describe *what should be done* (Environmental Terms Approval Decision of the TBP, Operating Regulation, Environmental Management Regulation), and
- Environment Records which are forms used by the Head of Environmental Management and other officers in charge of implementing the Environmental Management Regulation. These

forms are described, supplemented and kept in accordance with what is stated in the Regulation and actually record *what was actually done* in executing the respective activity.

These documents used in the daily operation of the TBP, may have a standard format, if this is deemed appropriate. They specify the officers in charge of their preparation and approval, as well as the document's identification (e.g. title, code, date etc.).

8.2 Permanent documents

The Environmental Management Regulation (EMR) annexed to the Operating Rules is the principal environmental management document - tool of the TBP and is an integral part of the Park's Operating Regulation, describing the requirements, the terms and procedures relating to the installation and operation of a business in the Park and the rights and obligations of the parties (EUs & BPM) concerning environmental protection.

Along with the ETAD, they should be retained by the Head of Environmental Management and the BPM's officers in charge, together with all other accompanying permanent documents, such as the liquid/solid waste disposal licence, the drilling licence, the water use licence, the facilities' ETAD, etc.

Any other permanent document that should be retained under the Environmental Management Regulation, should be appropriately labelled as such. The Head of Environmental Management ensures monitoring of such documents, communicating any update thereto and their distribution to the relevant recipients.

Such documents include:

- National law
- Community law (applicable regulations, legislation to be implemented in the near future)
- International standards and regulations
- safety data sheets (MSDS), etc.

8.3 Environmental Records

The Environmental Records are an important part of the documentation relating to environmental management in the TBP. They are the actual evidence, in case of inspection, either internal or external, that the Environmental Management Regulation is applied and are intended to monitoring the environmental performance of the TBP, including the provisions of the relevant legislation.

Based mainly on the applicable ETAD of the TBP (JMD Φ/A.6/1/30827/2733/2007) as updated and valid until 17-09-2017, the Environmental Records to be kept under the responsibility of the BPM include, *inter alia*, the following:

- Record of sewer manholes (numbers, location, year of manufacture, etc.)
- Record of repairs, obstructions and other work in the wells and piping of the network.
- Log of chemical analyses of samples from the output of KMEDA (certified by the Environmental Protection Directorate of the Thessaloniki Prefecture).
- Log of inspections of the quality of processed sludge discharged from KMEDA.
- Log of the results from air pollutants measuring stations in the premises of the TBP and in the wider region, in consultation with the Environmental Protection Directorate of the Thessaloniki Prefecture.
- Log of noise measurements at the boundaries of establishments and in the perimeter of the TBP.
- Log of water supply as shown by the installed meter at the new drilling.
- Log of measurement results of the still water-pumping level using automatic recording meter.
- An environmental record for all EUs operating within the TBP to monitor and control any air, soil and water pollution from each one of them, detailing the quantity and quality of liquid and solid waste.
- Log of any reports/complaints from operators and citizens (individual or collective) of the wider region.
- Log of any significant environmental events / non-conformities (certified by the competent authority, if required).

Based on the applicable ETAD of the TBP (JMD Φ/A.6/1/30827/2733/2007) as updated and valid until 17-09-2017, the Environmental Records to be kept under the responsibility of the EUs include, *inter alia*, the following:

- Log of chemical analyses of samples and outflow of liquid waste discharged from the facilities in KMEDA (certified by the competent prefectural department), if required by applicable law.
- Log to monitor emissions of gaseous pollutants and/or periodic measurements, in cooperation with appropriate certified external entities, as provided for by relevant legislation.
- Records provided for in the facilities' ETAD.

Many of the records relating to the implementation of the Environmental Management Regulation (e.g. for ongoing information or statistical processing purposes) may be kept in electronic form. To avoid any manipulation, loss or falsification of data, the records shall be kept by the recipients in a read-only format, and shall not be accessible to persons not authorised to access System records. Instructions may be issued to regulate matters concerning electronic records (backup copies, etc.).

8.4 Issue, revision and handling of documents

Under the responsibility of the Head of Environmental Management, documents may be checked periodically and revisions may be made, where necessary. It is also possible to adopt new ones or to revise the existing ones, upon reasoned request of the officer in charge and approval by the Head of Environmental Management.

When documents are revised, older versions shall be returned by the recipients to the Head of Environmental Management, who shall destroy them and keep on file a single copy of each version of the revised documents.

The person in charge of handling the documents is the Head of Environmental Management who has the overall responsibility for the documents issued under the Environmental Management Regulation. The Head of Environmental Management maintains a list of current versions of the standard documents and the recipients to whom the documents have been distributed.

8.5 Documents in electronic form

Documents can also be handled, as an alternative, in electronic form. In this case, approval of electronic documents should be in print. The person in charge of archiving all versions of approved documents and the contents of electronic documents is the Head of Environmental Management.

Electronic documents are not sent electronically and are stored in a point of the network, accessible to all recipients. Access to these documents is only possible with a password and allows the recipient to have read-only access to the latest version of the document, not its initial one.

Informing recipients whenever an existing document is revised or a new one is drafted is the responsibility of the Head of Environmental Management and is made by email. Receipt of documents in electronic form is documented by sending an automatic confirmation to all recipients.

Recipients are not allowed to store locally, to modify or to send electronic documents or to disclose passwords to anyone, and there is no such possibility. The only person responsible for handling and modifying controlled documents is the Head of Environmental Management.

In all cases, the operating, handling and archiving procedure of electronic documents and data in general, will be decided by the Board of the BPM and will depend on the degree of development of the information systems that will be installed.

9. TRAINING, INFORMATION AND QUALIFICATION OF STAFF

The EUs should employ staff as necessary for their operation; their selection, training and evaluation should be made as appropriate, according to reasonable criteria.

The staff working within the TBP for the purposes of this Regulation, is divided into two categories:

- staff directly involved in the management of environmental issues (e.g. officers in charge of compliance with the ETAD), and
- staff indirectly involved in the management of environmental issues (e.g. technical maintenance staff).

In all cases, selection of inhouse or freelance staff, directly or indirectly involved with environmental management in the TBP, should be based on the required skills, knowledge and qualifications that are essential for the job, as defined in the policy, the strategy and objectives set by the BPM.

The staff employed by the EUs should be informed by their supervisor of the tasks assigned to them, and they should be trained appropriately in environmental management issues by the relevant officer in charge of the EUs. After identifying staff training needs clearly, the relevant environmental management training programmes should be implemented. These are mainly aimed at providing information/training to the staff on:

- the importance of complying with the environmental policy, the requirements of environmental management regulation and each one's responsibilities/competences;
- the environmental effects of the activities of the job held by each one of them and the improvement of the overall environmental performance, which can be achieved by improving each one's performance;
- the possible negative consequences of non-compliance with certain environmental obligations.

Furthermore, the objective of environmental training programmes for staff directly involved with environmental management is their technical training on environmental issues, such as the operation and maintenance of equipment for environmental protection, the conduct of measurements, handling, control and calibration of environmental measuring instruments, etc.

The preparation, organisation, monitoring of their implementation and, generally, all procedural aspects of each educational programme are coordinated and performed by the relevant officer of the EUs, by keeping updated the Head of Environmental Management of the TBP.

Alongside educational programs implemented, the EUs should maintain a "library" with training and information material on environmental issues, which should be available to staff.

At the end of each training seminar, if necessary, both the seminar and the instructor(s) are evaluated by the participants.

A record should be kept for each employee that contains all their training details.

Staff may be assessed on an annual basis by their supervisors, and a record should be kept with their assessment results.

It should be noted that under the above described environmental management training procedure, joint training programmes may be conducted by the EUs and the BPM (e.g. implementation of emergency plans), where appropriate, and always by prior consultation and agreement between the BPM and the relevant EU.

10. COMMUNICATION

Communication on environmental management issues in the TBP may be internal or external.

10.1 Internal communication

Internal communication comprises:

- communication between agencies/departments under the responsibility of the BPM;
- communication between the BPM and the EUs;
- communication between the BPM and selected associates/contractors/subcontractors.

Internal communication may be performed in various ways, but must always be in writing (electronic or print form) where information need to be recorded and archived.

Appropriate, dedicated forms may be used for specialised internal communication, and staff notices for general matters. These forms may also be used for announcements/notifications to staff (e.g. posting on bulletin boards).

Specifically, communication with selected associates/contractors/subcontractors should be entered in a logbook and assigned a special registry number.

Minutes should be taken of all meetings relating to major environmental management issues (e.g. meetings of the Environmental Committee), which should then be archived and distributed to participants or other interested parties for their information. The responsibility for organising meetings and taking the minutes is assigned each time to a specific officer, selected based on their competence in the topics discussed. An appropriate form should be used for taking minutes which, at a minimum, should list:

- the participants;
- the topics discussed (a list of key points);

- the steps decided, the person responsible and the date of implementation;
- any important comments and observations;
- other issues, such as review of the actions decided in previous meetings and results.

The minutes are distributed to participants and to any other person, as appropriate, and are filed by the meeting coordinator.

In all cases, the EUs must keep the BPM constantly updated of environmental management issues in a timely, effective and reliable manner in order to avoid creating any problems in the daily operation of the TBP.

10.2 External communication

External communication on environmental management issues with interested individuals/groups/bodies or authorities, is mainly performed by the Head of Environmental Management of the TBP.

The Environmental Policy of the TBP is also available to interested parties upon request to the Head of Environmental Management.

Incoming requests or complaints on environmental issues or incoming information that needs to be identified, examined and monitored, are recorded in an appropriate form. Relevant information (e.g. any form of complaint or lawsuit, contact with the authorities or printed publication on the environmental effects of TBP operations), must also be attached.

The BPM, through the Head of Environmental Management, shall communicate to the parties involved, as appropriate, any information on the management of environmental issues arising from their operations in the following ways:

- by organising information meetings with staff or third parties;
- by issuing press releases;
- by posting advertisements;
- by making publications to the Press, etc.

LEGEND

ABBREVIATION	EXPLANATION
ETAD	Environmental Terms Approval Decision
TBP	Thessaloniki Business Park
EU(s)	Established Undertaking(s)
KMEDA	Central Liquid Waste Treatment Unit
JMD	Joint Ministerial Decision
EIA	Environmental Impact Assessment
PAT	Prefectural Authority of Thessaloniki
BPM	Business Park Manager
LS	Landfill Site



HELLENIC REPUBLIC
Ministry of Development, Competitiveness,
Infrastructure, Transport and Networks

Athens, 21-12-2012
Ref. No: Φ/A.6.1/οικ/15090/944

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SUBJECT: Request for renewal of the environmental terms approval for the Industrial Park in Kato Gefyra, Municipality of Chalkidona, Thessaloniki Region

Ref.: (a) Your request No 323/ΑΣΠ/ασπ/29-06-2012

(b) Article 2(8)(c) of Law 4014/2011 (Government Gazette, Series I, No 209) "Environmental licences for projects and operations, regulations concerning unauthorised building works alongside the establishment of environmental balance and other provisions falling under the jurisdiction of the Ministry of Environment".

(c) Letter No 212926/28-11-2012 of the Directorate for the Control of Air Pollution and Noise (EARTH) of the Ministry of Environment, Energy and Climate Change.

In response to your request in reference (a) above, we inform you that according to the provisions of Law referenced (b), the validity of the existing, upon publication of this Act, approved environmental terms is extended for ten years from their approval, provided that no substantial change has been brought to the data based on which they were approved.

Therefore, given that the approved environmental terms concerning the Industrial Park of Kato Gefyra, Thessaloniki, were in force at the time when Law referenced (b) was adopted, and there have been, as you claimed in your request ref. 323/ΑΣΠ/ασπ/29-06-2012, no substantial changes in the data based on which said environmental terms were determined in Joint Ministerial Decision No 14723/807/2003/ (Government Gazette, Series II, No 1234/01-09-2003), which is accepted by the Directorate for the Control of Air Pollution and Noise (EARTH) of the Ministry of Environment, Energy and Climate Change, their effect is extended until 17-09-2017, subject to Article 6 of Law referenced (b) above (Procedure for the amendment of environmental terms).

The Head of Directorate

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- Office of the Secretary General for Industry
- Office of the Director General for Industry Support - Directorate for the Environment & Spatial Planning
- Chronological Record

A. Mourtsiadi

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