

G3 CONTENT INDEX

Application Level

STANDARD DISCLOSURES PART I: Profile Disclosures

1. Strategy and Analysis

Profile Disclosure	Description	Reported	Cross-reference/Direct answer
1.1	Statement from the most senior decision-maker of the organization.		See this Report, page 5
1.2	Description of key impacts, risks, and opportunities.		See Annual Report pages 8-9

2. Organization Profile

Profile Disclosure	Description	Reported	Cross-reference/Direct answer
2.1	Name of the organization.		Heracles General Cement Company
2.2	Primary brands, products, and/or services.		See this Report page 4
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.		See this Report page 4
2.4	Location of organization's headquarters.		49-51 Sophocli Venizelou str, 141 23 Lycovrissi, Attica
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.		One. The company operates in Greece only.
2.6	Nature of ownership and legal form.		Limited company registered under Greek Law
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).		See this Report page 4
2.8	Scale of the reporting organization.		See this Report page 4, total number of employees: 1318, total asset:€884390k, beneficial ownership: €1434K ; capital structure: €673619K
2.9	Significant changes during the reporting period regarding size, structure, or ownership.		None
2.10	Awards received in the reporting period.		European Good Practice Awards 2010/11, Commended entry, See this Report page 19 Four Lafarge Cement Awards:Plant Mastery and POM Implementation, See this Report page 19. Talent Development Implementation, See this Report page 25. Best Initiative to Reduce our Environmental Footprint See this Report page 30. Special Prize for Cost Reduction and Cash Management concerning Fixed Cost.

3. Report Parameters

Profile Disclosure	Description	Reported	Cross-reference/Direct answer
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.		1st January 2010 - 31st December 2010
3.2	Date of most recent previous report (if any).		2009 Sustainability Report published in June 2010
3.3	Reporting cycle (annual, biennial, etc.)		Annual
3.4	Contact point for questions regarding the report or its contents.		Costas Giannaros, GiannarosC@lafarge.gr
3.5	Process for defining report content.		See this Report page 13,38
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers).		Report covers the activities of Heracles Cement Company only
3.7	State any specific limitations on the scope or boundary of the report.		No such limitations identified. See 3.6 and 3.8
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.		Same coverage as in Sustainability Report 2009
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.		See Lafarge Group Sustainability Report pages 36-37.
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).		None
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.		None
3.12	Table identifying the location of the Standard Disclosures in the report.		See this Report page 39-46

3.13	Policy and current practice with regard to seeking external assurance for the report.		Heracles is part of the Lafarge Group. Much of the data used in the Heracles Sustainability Report is subject to Lafarge Group internal and external (Ernst and Young) verification and assurance. (See page 36 of the Lafarge Group Sustainability Report 2010). At this stage in our development of sustainability reporting we do not consider that additional assurance at company level is necessary.
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4. Governance, Commitments, and Engagement

Profile Disclosure	Description	Reported	Cross-reference/Direct answer
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.		See this Report, pages 6-7. The Managing Director reports to the Board on matters relating to economic, social and environmental performance.
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.		The Chair of the Board is not an executive officer. See this Report page 6.
4.3	For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.		See this Report, page 6. Our Corporate Internal Regulation prescribes that independent and non executive board members shall have no other responsibilities apart from participation in the audit committee.
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.		We uphold the rights of shareholders, including minority shareholders, as specified in Greek law. Internal mechanisms are in place for employees to make suggestions to the Management via unions and the Management meets periodically with trade union representatives
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).		Personal targets for both safety and sustainability are included in key managers' performance targets. See this Report page 8.
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.		The Charter for the Board of Directors includes a paragraph on conflict of interest. It states that a Board member should notify the Board in a timely manner if a conflict of interest arises. Board members, Executive Committee and operational management state their compliance with our conflict of interest policies in an annual certification letter.
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics.		The General Assembly of shareholders assesses the performance of the Board. They take into account the balance of the Board's composition. They ensure that each Director possesses the necessary qualities, experience and competence (including on strategy, economic, environmental and social topics) thereby enabling the Board to perform its duties effectively. They implement corporate governance requirements according to Greek legislation and take into account the balance of the Board's composition
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.		See this Report, pages 6-7, 24.
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.		See this Report, page 7.
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.		The General Assembly of Shareholders assesses the performance of the Board.
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.		See Lafarge Group Sustainability Report page 8 referring to commitment to limiting climate change. Heracles is part of the Group and shares this commitment. See also Heracles Environmental Policy, paragraph 1, commitment to sustainable development principles.
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.		See this Report, page 9

4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.		See this Report, page 9
4.14	List of stakeholder groups engaged by the organization.		Categories of stakeholder groups are identified; See this Report page 13, Identification of individuals and groups by name is not appropriate.
4.15	Basis for identification and selection of stakeholders with whom to engage.		See this Report page 12-13
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.		See this Report page 12-13
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.		See this Report page 12-13, 34-35

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

G3 DMA	Description	Reported	Cross-reference/Direct answer
DMA EC	Disclosure on Management Approach EC		
Aspects	Economic performance		See Annual Report , page 8 and pages 28-32
	Market presence		See Annual Report, page 8 and this Report, page 4
	Indirect economic impacts		See this Report, page 23
DMA EN	Disclosure on Management Approach EN		
Aspects	Materials		See Environmental Policy and this Report, page 31
	Energy		See Environmental Policy and this Report, page 25
	Water		See Environmental Policy and this Report, page 30
	Biodiversity		See Environmental Policy and this Report, page 32
	Emissions, effluents and waste		See Environmental Policy and this Report, pages 28 and 31.
	Products and services		See Annual Report page 8, Environmental Policy and this Report pages 16 and 34
	Compliance		See Environmental Policy and this Report, page 24
	Transport		See this Report page 25
Overall		See Environmental Policy	
DMA LA	Disclosure on Management Approach LA		
Aspects	Employment		See Code of Business Conduct page 7 and this Report page 20
	Labor/management relations		See Code of Business Conduct, introduction and page 7. Heracles is also a signatory to the Global Compact: see principles 3,4,5 and 6 of the Compact
	Occupational health and safety		See Code of Business Conduct page 7 and this Report page 18
	Training and education		See this Report page 20
	Diversity and equal opportunity		See Code of Business Conduct page 7 and this Report page 21
DMA HR	Disclosure on Management Approach HR		
Aspects	Investment and procurement practices		This is not a material issue for us, given the high standards of human rights in Greece and the fact that our operations and almost all of our suppliers are based in Greece. We are however signatories to the UN Global Compact.
	Non-discrimination		See Code of Business Conduct page 7
	Freedom of association and collective bargaining		This is not a material issue for us, given the high standards of human rights in Greece and the fact that our operations and almost all of our suppliers are based in Greece. We are however signatories to the UN Global Compact.
	Child labor		
	Forced and compulsory labor		
	Security practices		
Indigenous rights			
DMA SO	Disclosure on Management Approach SO		
Aspects	Community		See Environmental Policy and this Report page 22
	Corruption		See Code of Business Conduct pages 2 and 4 and this Report page 7
	Public policy		See Code of Business Conduct page 6 and Lafarge Lobbying Charter
	Anti-competitive behavior		See Code of Business Conduct pages 3 and 4 and this Report pages 6 and 7
	Compliance		See Code of Business Conduct, Environmental Policy and this Report page 22

DMA PR	Disclosure on Management Approach PR		
Aspects	Customer health and safety		See Code of Business Conduct page 7 and this Report page 34
	Product and service labelling		See Code of Business Conduct page 2 and this Report page 35
	Marketing communications		See Code of Business Conduct page 3
	Customer privacy		See Code of Business Conduct page 3
	Compliance		See Code of Business Conduct page 2

STANDARD DISCLOSURES PART III: Performance Indicators

Economic

Performance Indicator	Description	Reported	Cross-reference/Direct answer
Economic performance			
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.		See this Report, page 17
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.		See Lafarge Group Sustainability Report 2010 page 8 (strategy for transition to sustainable economy in light of climate change). Heracles is a participant in this strategy; see this Report page 34 (sustainable construction).
EC3	Coverage of the organization's defined benefit plan obligations.		Heracles relies on the public pension system for its employees, not on private pension companies. However, the Company compensates retiring staff with the equivalent of 100% of the compensation in case of dismissal, and recognizes the cost of these expected payments in its financial reporting. No other significant benefit plan is run by the Company.
EC4	Significant financial assistance received from government.		No significant financial assistance received
Market presence			
EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation.		The Heracles G.C.Co minimum salary is 129% % of the statutory minimum
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.		See this Report page 23, 36-37
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.		The majority of our staff are local hires. 15% of senior and executive management are expatriates. We recruit employees with the skills that best meet the needs of our business
Indirect economic impacts			
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.		See this Report, page 23
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.		See this Report, page 23

Enviromental

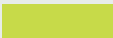


Performance Indicator	Description	Reported	Cross-reference/Direct answer
Materials			
EN1	Materials used by weight or volume.		Raw materials and fuels: 7,083.5 kt; Clinker: 3,508 kt; Cement: 4,190 kt
EN2	Percentage of materials used that are recycled input materials.		8.9% of our material are from recycling (fly ash, styra bauxite, slag and calamine)
Energy			
EN3	Direct energy consumption by primary energy source.		4772 MJ coal, 7238 MJ petcoke; 98 MJ oil; 61 MJ gas; 110 MJ biomass
EN4	Indirect energy consumption by primary source.		1748790 MJ (485775 Mwh). Electricity purchased from the public grid in Greece is generated using coal (c. 60%), oil (c.15%), gas (c.13%) hydro (c. 8%) with the balance comprising other sources including other renewables.
EN5	Energy saved due to conservation and efficiency improvements.		See this Report , page 25, 27
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.		See this Report page 25 (Alternative fuels) and 34 (our products)
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.		See this Report, page 25,27

Water			
EN8	Total water withdrawal by source.		2,842,971 m ³ /year ground water; 306,625 m ³ /year surface water; 276,065 m ³ /year other
EN9	Water sources significantly affected by withdrawal of water.		See this Report page 30
EN10	Percentage and total volume of water recycled and reused.		See this Report page 30
Biodiversity			
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.		1. Milos island Pozolane quarry which consists of: 227.000 m ² land owned 439.000 m ² land leased The quarry area is in a protected area of the red viper (vipera scwheizeri) as well as adjacent to Natura 2000 protected zone. Hornstone quarries (two) in Anavra Volos. Both quarries are leased i) The first is 135.000 m ² and ii) the other 230.000 m ² both are inside the Natura 2000 protected zone.
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.		Our main impact on biodiversity is related to our quarry activity. All of our quarries have had in the past an impact on the original habitat of flora and fauna due to disturbance and change in topography. These impacts are now being mitigated through rehabilitation plans (see page 32). Potential for ongoing impacts due to offsite effects (dust, noise, lighting etc) exists but is mitigated through site management and audits (see page 24) and through the conduct of environmental assessments at each quarry as part of the permitting process. Three quarries are in or adjacent to protected areas. (see EN11).
EN13	Habitats protected or restored.		During 2010, 102,000 m ² were restored according to the plan submitted and authorized by the authorities. Environmental inspectors as well as mining inspectors often visit the quarries to certify that rehabilitation programme is progressing in line with the environmental and mining terms.
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.		In conjunction with WWF the Lafarge Group has worked on a set of guidelines for biodiversity management in quarries. The substance of the guidelines has been incorporated into the agreed methodology recommended by the WBCSD Cement Sustainability Initiative. Heracles is committed to achieving full implementation by the end of 2012; See this Report page 11
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.		The Pozolane quarry on Milos island is in a protected area of ecological value. In particular, the area has two protected species, the vipera scwheizeri and the Mediterranean seal (monachus monachus).
Emissions, effluents and waste			
EN16	Total direct and indirect greenhouse gas emissions by weight.		2997000 metric tons according to the methodology specified in EU directive 2007/589
EN17	Other relevant indirect greenhouse gas emissions by weight.		This is estimated to be c. 40,000 metric tons.
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.		See this Report page 11,25-26
EN19	Emissions of ozone-depleting substances by weight.		0
EN20	NOx, SOx, and other significant air emissions by type and weight.		See this Report page 29
EN21	Total water discharge by quality and destination.		See this Report page 30
EN22	Total weight of waste by type and disposal method.		See this Report page 31
EN23	Total number and volume of significant spills.		0
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.		0 total; 0% shipped
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.		No wetland or water body is significantly affected by water discharges. A study of the Gulk of Aliveri is underway and recommendations are being followed. See this Report page 30.
Products and services			
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.		See this Report page 16, 25 (Innovation) and 34;
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.		100% of packaging materials used for bagged cement are reclaimed. Packaging materials are not an issue for bulk cement sales.

Compliance			
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.		Monetary value 138825; no non-monetary sanctions
Transport			
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.		These are not identified as key impacts for our business but see this Report page 25 for actions being taken.
Overall			
EN30	Total environmental protection expenditures and investments by type.		€ 6,275,121 capex; € 321,588 wastes management; € 434,938 cleaning and watering of plants areas; € 552,818 environment restoration; € 136,093 recycling and utilizing expenses.
Social: Labor Practices and Decent Work			
Performance Indicator	Description	Reported	Cross-reference/Direct answer
Employment			
LA1	Total workforce by employment type, employment contract, and region.		For Heracles General Cement Company the figure is 1318 as of 31 December. 100% are on full time permanent contracts. All our employees are located in Greece so there is no breakdown by regions.
LA2	Total number and rate of employee turnover by age group, gender, and region.		See Sustainability Report page 21. The turnover rate is 23% (264) per men and 15% (22) per women, while it is 2% (2) for the ages below 30, 2% (18) for the ages 31-50 and 63% (266) for the ages above 51. All our employees are located in Greece so there is no breakdown by regions.
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.		This is not applicable as all our employees are full time.
Labor/management relations			
LA4	Percentage of employees covered by collective bargaining agreements.		All, as per applicable law in Greece
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.		As per applicable law. Notice period is not specified in Collective Agreements.
Occupational health and safety			
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.		All employees are covered by Health and Safety Committees, with elected representatives in the plants
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region.		See this Report page 18 and 19. All data refers to Greece. Absenteeism rate was 0,025 - 2,5% of the total working time, due to sickness and lost time incidents (60 days).
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.		The comprehensive Heracles General Cement Company occupational health program includes educational and preventive measures
Training and education			
LA10	Average hours of training per year per employee by employee category.		See this Report page 21
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.		See this Report page 21
LA12	Percentage of employees receiving regular performance and career development reviews.		See this Report page 21. 100% of our cadre population receives annual and mid year performance reviews
Diversity and equal opportunity			
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.		Board of Directors: Age: 31-50: 25%, 50+: 75%, Gender: M 100%, Nationality: Impatriates --> 50% Executive Committee: Gender F --> 25%, M --> 75% Age 31-50 --> 100% Nationality Impatriates --> 25% Employees: See this Report page 21
LA14	Ratio of basic salary of men to women by employee category.		This is not material issue for us. Heracles has a gender-neutral pay system which follows the Greek and EU pay equality legislation.

Social: Human Rights			
Performance Indicator	Description	Reported	Cross-reference/Direct answer
Investment and procurement practices			
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.		This is not a particularly material issue for us, given the high standards of human rights in Greece. All of our investments are in Greece.
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.		This is not a particularly material issue for us, given the high standards of human rights in Greece and that 73% of our supplies are sourced from Greece. Consequently we do not track data on this matter.
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.		This is not a particularly material issue for us, given the high standards of human rights in Greece.
Non-discrimination			
HR4	Total number of incidents of discrimination and actions taken.		No incidents related to breach of the Code of Business Conduct principles concerning discrimination were reported through the business in Greece.
Freedom of association and collective bargaining			
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.		Not applicable. Freedom of association is guaranteed in Greece.
Child labor			
HR6	Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor.		Not material issue for us. Child labor not a material issue in Greece
Forced and compulsory labor			
HR7	Operations identified as having significant risk for incidents of forced or compulsory labor, and measures taken to contribute to the elimination of forced or compulsory labor.		Not material issue for us. Forced and compulsory labor not lawful in Greece.
Security practices			
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.		This is not a particularly material issue for us, given the high standards of human rights in Greece.
Indigenous rights			
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.		
Social: Society			
Performance Indicator	Description	Reported	Cross-reference/Direct answer
Community			
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.		Each of our sites, as part of their local integration plans, assesses the primary and secondary value created by our operations. See this Report page 12, 22-23
Corruption			
SO2	Percentage and total number of business units analyzed for risks related to corruption.		100% of Heracles Cement Company.
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.		See this Report page 6 (41% of employees, 95% of contractor drivers)
SO4	Actions taken in response to incidents of corruption.		None. There have been no such incidents.
Public policy			
SO5	Public policy positions and participation in public policy development and lobbying.		See Lafarge Group Sustainability Report 2010, page 8 and Lafarge Lobbying Charter. These public policy positions are adopted on behalf of the Lafarge Group of which Heracles is part.
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.		0
Anti-competitive behavior			
SO7	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.		None
Compliance			
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.		Nil

Social: Product Responsibility			
Performance Indicator	Description	Reported	Cross-reference/Direct answer
Customer health and safety			
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.		The company assesses the impact of products and services on health and safety during their production, transport and use. Products are labeled accordingly and safe instructions are provided to users.
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.		None
Product and service labelling			
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.		Material Safety Data Sheets (MSDS) are available for all types of cement produced. These are provided to our clients and any cement user and are also posted on our website
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.		None
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.		See this Report page 3
Marketing communications			
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.		Members of the Communication Control Council
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.		None
Customer privacy			
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.		None
Compliance			
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.		0

	Fully Reported
	Partially Reported
	Not Material Factor