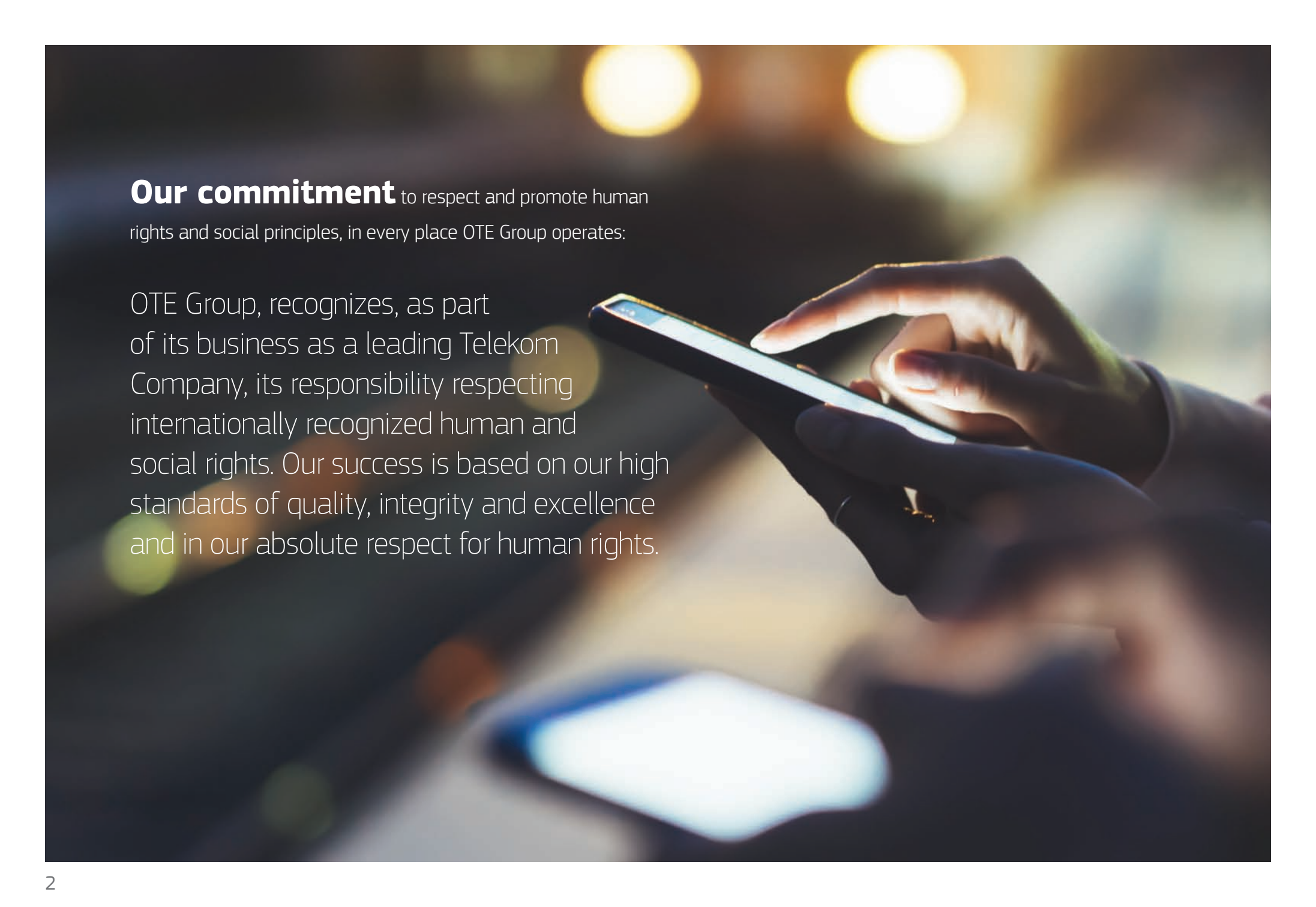




Code of Human Rights & Social Principles OTE Group



Our commitment to respect and promote human rights and social principles, in every place OTE Group operates:

OTE Group, recognizes, as part of its business as a leading Telekom Company, its responsibility respecting internationally recognized human and social rights. Our success is based on our high standards of quality, integrity and excellence and in our absolute respect for human rights.



OTE Group, bearing in mind its responsibility, as a large International Group of Companies:

- Respects the cultural, ethical, social, political and legislative diversity of the nations and societies in which it operates,
- Is aware of the necessity to satisfy contemporary needs in a socially, economically and ecologically well-balanced manner that takes into account the protection of the living and working conditions of future generations,
- As an ICT Company is committed to abide by and promote human and social rights with regard to responsibilities emerging from technological change and digitalization.



OTE Group complies with internationally recognized norms, directives, standards and in particular those of:

1. The International Bill of Human Rights (United Nations)
2. The Core Conventions of International Labor Organization (ILO)
3. The OECD Guidelines
4. The Global Compact of United Nations
5. The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) and
6. The Guiding Principles on Business and Human Rights (United Nations).

OTE Group embraces the following Fundamental Human Rights & Social Principles:

- 1.** Acknowledges and respects the cultural, social, political and legislative diversity of all nations and societies and is committed to respecting and promoting internationally recognized human rights, in the context of its activity.
- 2.** Recognizes the fundamental right to the freedom of association and the right to collective bargaining within the scope of national legislation and existing agreements, and also declares its support for cooperation in an open and constructive social dialog with a relationship of mutual trust with the legitimately elected employee representatives, with the aim of reciprocal benefit.
- 3.** Is in favor of prohibiting all kinds of forced labor, human trafficking and modern slavery;
- 4.** Is committed to contributing to the abolishment of exploitative child labor and guarantees that, at least the minimum age for admittance to employment is observed within the OTE Group, in accordance with the applicable laws of each country;
- 5.** Rejects every form of discrimination in the workplace and declares itself in favor of the promotion of equal opportunities as well as diversity of all employees in terms of gender, age, culture, religion, competencies and sexual orientation;
- 6.** Is committed to treat all employees with respect without using any form of corporal punishment, mental or physical coercion, abuse or harassment, or the threat of such treatment;
- 7.** Respects the right to reasonable contractual remuneration, according to the respective national labor market, providing at least the minimum wages according to law and guarantees the compliance with the relevant national laws on working hours and on regular paid leave;
- 8.** Supports skills' development for the benefit of both the employees and the OTE Group, in order to achieve permanently high standards of performance and high service quality, and at the same time, emphasizes and fosters the personal responsibility that employees have to maintain and improve their employability;
- 9.** Sees the health of its employees of major value and aims to protect the health and safety of its employees, ensuring at least the compliance to national health and safety standards at its buildings and by supporting their further development to improve the working environment.
- 10.** Is committed, in the context of its activities, to environmental protection and fostering the positive impact of business sustainability.

Purpose, scope of implementation and amendment

1. OTE Group complies with the applicable laws and strives to comply with the international standards so as not to violate human rights.
2. OTE Group declares the observance and application of this Code of Human Rights & Social Principles as binding on all Group companies.
3. This Code is periodically reviewed in light of national and international developments and, in this context; it may be amended (if it is deemed necessary).

Implementation

1. OTE Group ensures the group-wide communication of the Code of Human Rights & Social Principles and provides training of the Code of Human Rights and Social Principles to its employees, relevant stakeholders and its suppliers and expects them to observe, respect and apply the above mentioned principles throughout their operations and business relationships.
2. Further, OTE has designated on a corporate level, the Executive Director Compliance, ERM and Insurance OTE Group, as the responsible Officer for managing Human

Rights issues, to whom, together with the designated persons in the group companies, internal and external inquiries as well as any relevant tip offs are addressed.

3. OTE Group assesses and monitors the adherence to the Code of Human Rights and Social Principles in its business activities through "Compliance Review", along with regular impact assessments across its organizational units.
4. The Board of Directors of OTE Group companies are responsible for the observance of the Code of Human Rights & Social Principles and define the designated persons to whom business associates, customers and employees may address their relevant concerns whenever it is necessary.
5. OTE Group undertakes an annual review to verify compliance with the Code of Human Rights and Social Principles by all Group companies and publishes the results of this review in the "Annual Sustainability Report OTE Group".
6. OTE Group further reserves the right to check the compliance with the Code of Human Rights & Social Principles in a suitable manner by carrying out spot checks whether there is a well-founded suspicion, or not, when it is deemed necessary.





Communication & Transparency

With respect to the principle of Transparency, OTE Group is committed to communicate its progress on the observation and implementation of the Code of Human Rights & Social Principles in all its activities, to the internal and external stakeholders of the Group.

“ASK ME!” COMMUNICATION CHANNEL

For questions regarding the compliance with the Code of Human Rights and Social Principles or in case of doubt, you can consult the Compliance Office via the “Ask me!” communication channel.

Contact information for “Ask me!”

E-Mail: askmecompliance@ote.gr

“TELL ME!” COMMUNICATION CHANNEL

Information concerning possible violations of the Code of Human Rights and Social Principles can be reported via “Tell me!” communication channel.

Contact information for “Tell me!”

Hellenic Telecommunications Organization S.A. (OTE S.A.)
OTE Group Compliance Office,
99 Kifissias Ave., 15124 Maroussi, Athens, Greece

or

Hellenic Telecommunications Organization S.A. (OTE S.A.)
OTE Group Compliance Office,
P.O. BOX 61368 / GR-15104 Maroussi, Athens, Greece
Phone: +30 2106112345

E-Mail: tellmecompliance@ote.gr, whistleblowing@ote.gr

Internet: <https://www.cosmote.gr/en/compliance/tell-me-channel>

For any other issues related to the Code of Human Rights and Social Principles, you can contact the Compliance Office, via the communication channel: humanrights@ote.gr