

**Sustainability Report 2017**

**Appendix**

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## 2017 Performance

2017 Goals	2017 Performance	
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### Sustainability

<b>OTE Group:</b> Publication of the OTE Group Sustainability Report.	F	See <a href="#">Report Profile</a> .
<b>OTE Group:</b> Material Issues Analysis.	F	See <a href="#">Materiality Analysis</a> .
<b>OTE Group:</b> Further incorporation of the Sustainable Development Goals of the United Nations in the business strategy.	F	See <a href="#">Sustainability Strategy and Contribution to the United Nations' Sustainable Development Goals</a> .

### Responsible Business

<b>OTE Group:</b> Strengthening the risk culture within the organization by identifying and implementing risk appetite over a two-year horizon.	IP	The "Risk Appetite Approach" has been adopted by the OTE Group GRC Committee. See <a href="#">Policies and Management of Enterprise Risk and Compliance</a> .
<b>OTE-COSMOTE:</b> Certification of the Compliance Management System in accordance with the IDW Assurance Standard 980 "Principles for the Proper Performance of Reasonable Assurance Engagements Relating to Compliance Management Systems".	F	See <a href="#">Policies and Management of Enterprise Risk and Compliance</a> .
<b>OTE-COSMOTE:</b> Certification of the Compliance Management Systems in accordance with ISO 37001:2016 "Anti-Bribing Management Systems", as well as, in accordance with ISO 19600: 2014 (attestation) "Compliance Management System".	F	See <a href="#">Policies and Management of Enterprise Risk and Compliance</a> .
<b>OTE-COSMOTE:</b> Updating of the enterprise risks and optimization of Business Continuity Program.	F	The enterprise risks were updated through the extensive Business Impact Analysis (BIAs) performed in all companies. The optimization of the Business Continuity Program was achieved by the update and production of BCM plans covering the majority of the critical processes and services. See <a href="#">Business Continuity</a> .
<b>OTE-COSMOTE:</b> Increase of mobile apps users by 50%.	F	See <a href="#">Digital Transformation</a> .
<b>OTE-COSMOTE:</b> 1.3 million customers make use of electronic billing.	F	See <a href="#">Digital Transformation</a> .
<b>OTE-COSMOTE:</b> Implementation and installation of an information security compliance monitoring system.	F	The information security compliance monitoring system aims to the continuous or ad-hoc verification of security level of the systems. The implementation phase of this system was completed in December 2017 followed by the testing phase.
<b>OTE-COSMOTE:</b> Preparation for the implementation of the new European Guidelines for the Protection of Personal Data (GDPR).	F	See <a href="#">Security and Data Privacy</a> .
<b>OTE Group:</b> New registry of suppliers with data on the existing and potential ones.	F	A new vendor registry was introduced in 2017. The new registry allows new vendors to express their interest to cooperate with OTE Group, by registering and sharing their corporate profile. Vendors who have collaborated with OTE Group in the past may update their profile, when necessary.
<b>OTE-COSMOTE:</b> Evaluation of suppliers who account for 80% and 90% respectively of OTE and COSMOTE purchases.	P	In 2017, 171 suppliers, who account for 78% of the annual procurement value of OTE were evaluated and 148 suppliers, who account for 91% of the annual procurement value of COSMOTE. See <a href="#">Responsible Procurement and Supply Chain Management</a> .

## 2017 Goals

## 2017 Performance

### Responsible Employment and Development

<p><b>OTE-COSMOTE:</b> Create a digital working environment, where digital tools will support the systems and HR processes, improving employees' experience.</p>	F	<p>Implementation of HR DigiFile; a sophisticated HR document management system for OTE, COSMOTE, GERMANOS and COMOTE E-value (soon available for the rest of the companies of OTE Group in Greece), which involves the digitization of human resources files, i.e. the individual files of employees, one by one.</p> <p>Implementation of the HR DigiFlow Platform for OTE, COSMOTE and GERMANOS employees for electronic approval, storage and retrieval of any type of HR document. The design of HR DigiFlow provides the ability of approvals via mobile and the interface with other IT systems.</p> <p>Employees have access to a corporate digital job search platform named HR Suite, where they can apply for positions within OTE Group and explore international career opportunities within Deutsche Telekom Group.</p> <p>See <a href="#">Digital Transformation</a> and <a href="#">Approach (Responsible Employment and Development)</a></p>
<p><b>OTE-COSMOTE:</b> Design development programs for employees' digital skills.</p>	F	<p>OTE Group invests in alternative training methods with emphasis on Digital Learning. – Platforms that provide to all employees opportunities to develop their Business, Office and IT skills.</p> <p>See <a href="#">Employee Training and Skills Development</a>.</p>
<p><b>OTE-COSMOTE:</b> Design and implement a common Job Families model for employees.</p>	F	<p>In 2017, the design of the integrated Job Family Model in fixed and mobile telecom activities for all employee positions was completed and it was complemented by the identification and analysis of all discrete roles within all Business Units.</p> <p>See <a href="#">Approach. (Responsible Employment and Development)</a></p>

### Digital Society

<p><b>OTE-COSMOTE:</b> Provision of IoT solutions to the marketplace.</p>	F	<p>In 2017, new services were launched, e.g. e-Fuel Management. See <a href="#">Products and Services for Sustainability</a>.</p>
<p><b>OTE-COSMOTE:</b> Extension of research activities to new leading edge technologies.</p>	F	<p>Participation in 7 new 5G EU funded projects (on top of the 4 5G projects of Phase I), and internal development of an innovative IoT Testbed. See <a href="#">Research and Innovation</a>.</p>

### Better World for All

<p><b>OTE-COSMOTE:</b> Enhancement of initiatives for the development of children and young people's digital skills.</p>	F	<p>See <a href="#">Social Contribution</a>.</p>
<p><b>OTE-COSMOTE:</b> Enhancement of initiatives for the development of the digital skills of elderly people.</p>	F	<p>See <a href="#">Social Contribution</a>.</p>
<p><b>OTE-COSMOTE:</b> Continue to support actions that meet major and current needs of the society.</p>	F	<p>See <a href="#">Social Contribution</a>.</p>

### Sustainable Environment for All

<p><b>OTE-COSMOTE:</b> Contribution to the achievement of the CO<sub>2</sub> emissions reduction target set for 2020 at DT Group level (20% reduction compared to 2008), by planning and implementing measures for energy conservation and CO<sub>2</sub> emissions reduction .</p>	F	<p>See <a href="#">Energy and Climate Change Environmental Performance Data – Energy</a></p>
<p><b>OTE-COSMOTE:</b> Reduction of CO<sub>2</sub> emissions (scope 1 and scope 2) by 3% compared to 2008 levels.</p>	F	<p>See <a href="#">Energy and Climate Change</a></p>

2017 Goals	2017 Performance	
<b>OTE-COSMOTE:</b> Expanding the scope of the Energy Management System, according to the provisions of the ISO 50001:2011, to at least 5 buildings and 5 base stations, and certification.	F	See <a href="#">Approach</a>
<b>OTE:</b> Stabilization of electricity consumption in the telecom network at 2016 levels.	N	See <a href="#">Energy and Climate Change</a>
<b>COSMOTE:</b> Restriction of the increase of electricity consumption in the telecom network at 5% compared to 2016.	N	See <a href="#">Energy and Climate Change</a>
<b>OTE-COSMOTE:</b> Improvement of energy performance of vehicles fleet by 1%.	F	Total energy consumption decreased by 2.4% while unit consumption (in kWh/km) decreased by 1.5%.
<b>OTE-COSMOTE:</b> Expansion of the integrated recycling program for packaging materials in 2 additional buildings.	N	It was decided not to further extend the recycling program, but to implement improvements in the 17 buildings already in the scope of the program, instead.
<b>OTE-COSMOTE:</b> Recycling of 100% of hazardous and technical waste withdrawn	F	See <a href="#">Circular Economy</a>
<b>COSMOTE:</b> Installation of 7 additional EMF measurement stations.	F	See <a href="#">Electromagnetic Fields</a>

INDEX KEY: F = Fully P = Partially IP = In Progress N = Not achieved

## Accountability Principles Standard AA1000 Index

Principle Applied	Methods	Report Location
<b>Inclusivity</b>	Identification of key Stakeholders and dialogue to understand key issues	<a href="#">Sustainability Strategy</a> <a href="#">Stakeholders</a> <a href="#">Materiality Analysis</a> <a href="#">Additional Information for GRI Indicators</a>
<b>Materiality</b>	Identification of issues which are important to the company and its stakeholders	<a href="#">Sustainability Strategy</a> <a href="#">Stakeholders</a> <a href="#">Materiality Analysis</a> <a href="#">Additional Information for GRI Indicators</a>
<b>Responsiveness</b>	Responsiveness to key issues and transparency on performance	<a href="#">Sustainability Strategy</a> <a href="#">Stakeholders</a> <a href="#">Materiality Analysis</a> <a href="#">Additional Information for GRI Indicators</a>

## United Nations Global Compact – Communication on Progress (CoP)

For the protection of human rights and society's needs, during these challenging times, adhering to the 10 Principles of the UN Global Compact by the enterprises is of critical importance. OTE Group, the leading technology company in Greece and one of the major telecom providers in SE Europe, with these Principles as a guide and through social contribution and technology, has as a vision to contribute to a better world for all.

### Michael Tsamaz

Chairman and CEO of OTE Group

Since 2008, OTE Group companies support the UN Global Compact, the largest voluntary corporate citizenship initiative in the world, and abide by its ten universal values in the areas of human rights, labor standards, the environment and anti-corruption.

The 2017 Sustainability Report includes a detailed presentation of the companies' priorities, activities, goals and outcomes, responding to all 21 criteria of Advanced CoP.



This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.

Criteria	Report Location
<b>Implementation of the Ten Principles into Strategies &amp; Operations</b>	
1 The COP describes mainstreaming into corporate functions and business units	<a href="#">Sustainability Strategy</a>
2 The COP describes value chain implementation	<a href="#">Approach (Responsible Business), Responsible Procurement and Supply Chain Management</a>
<b>Robust Human Rights Management Policies &amp; Procedures</b>	
3 The COP describes robust commitments, strategies or policies in the area of human rights	<a href="#">Human Rights Management</a>
4 The COP describes effective management systems to integrate the human rights principles	<a href="#">Human Rights Management</a>
5 The COP describes effective monitoring and evaluation mechanisms of human rights integration	<a href="#">Human Rights Management</a>
<b>Robust Labour Management Policies &amp; Procedures</b>	
6 The COP describes robust commitments, strategies or policies in the area of labour	<a href="#">Responsible Employment and Development</a>
7 The COP describes effective management systems to integrate the labour principles	<a href="#">Responsible Employment and Development</a>
8 The COP describes effective monitoring and evaluation mechanisms of labour principles integration	<a href="#">Responsible Employment and Development</a>

Criteria	Report Location
<b>Robust Environmental Management Policies &amp; Procedures</b>	
9 The COP describes robust commitments, strategies or policies in the area of environmental stewardship	<a href="#">Sustainable Environment for All</a>
10 The COP describes effective management systems to integrate the environmental principles	<a href="#">Sustainable Environment for All</a>
11 The COP describes effective monitoring and evaluation mechanisms for environmental stewardship	<a href="#">Sustainable Environment for All</a>
<b>Anti-Corruption Management Policies &amp; Procedures</b>	
12 The COP describes robust commitments, strategies or policies in the area of anti-corruption	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>
13 The COP describes effective management systems to integrate the anti-corruption principle	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>
14 The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>
<b>Taking Action in Support of Broader UN Goals and Issues</b>	
15 The COP describes core business contributions to UN goals and issues	<a href="#">Contribution to the United Nations' Sustainable Development Goals</a>
16 The COP describes strategic social investments and philanthropy	<a href="#">Social Contribution</a>
17 The COP describes advocacy and public policy engagement	<a href="#">Responsible Competition, Connectivity for All</a>
18 The COP describes partnerships and collective action	<a href="#">Memberships, Ratings and Awards, Additional Information for GRI Indicators</a>
<b>Corporate Sustainability Governance and Leadership</b>	
19 The COP describes CEO commitment and leadership	<a href="#">Sustainability Governance</a>
20 The COP describes Board adoption and oversight	<a href="#">Sustainability Governance</a>
21 The COP describes Stakeholder engagement	<a href="#">Stakeholders, Additional Information for GRI Indicators</a>



## Greek Sustainability Code – Declaration of Conformity

OTE Group, a Sustainability Ambassador of the initiative “Sustainable Greece 2020”, participated, in 2015, in the development process of the Greek Sustainability Code that was launched in April 2016. The OTE Group declaration of conformity with the 20 criteria of the Code is presented hereafter.

### The 20 criteria of the Greek Sustainability Code: Actions recorded in 2017 Sustainability Report

Theme	Criteria	Report Location
<b>Strategy</b>	1. Strategic analysis and action	<a href="#">Sustainability Strategy</a>
	2. Materiality	<a href="#">Materiality Analysis</a>
	3. Objectives	<a href="#">2017 Performance and 2018 Targets</a> <a href="#">2017 Performance</a>
	4. Value chain management	<a href="#">Responsible Procurement and Supply Chain Management</a>
<b>Process Management</b>	5. Responsibility	<a href="#">Sustainability Governance</a>
	6. Rules and procedures	<a href="#">Policies and Management of Enterprise Risk and Compliance</a> <a href="#">Integrated Management System</a>
	7. Monitoring	<a href="#">Group Presentation</a> <a href="#">Sustainability Governance</a> <a href="#">Integrated Management System</a> <a href="#">Independent Limited Assurance Report to the Management of OTE Group</a>
	8. Rewarding schemes and motives for sustainable development	<a href="#">Sustainability Governance</a> <a href="#">Employee Selection, Attracting and Retaining Talented Employees</a>
	9. Stakeholders engagement	<a href="#">Stakeholders</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a>
	10 Responsible products and innovation	<a href="#">Products and Service for Sustainability</a> <a href="#">Research and Innovation</a> <a href="#">Energy and Climate Change</a>

Theme	Criteria	Report Location
<b>Environment</b>	11. Use of natural resources	<a href="#">Energy and Climate Change</a> <a href="#">Circular Economy</a>
	12. Management of resources	<a href="#">Energy and Climate Change</a> <a href="#">Circular Economy</a>
	13. Climate relevant emissions	<a href="#">Energy and Climate Change</a> <a href="#">Other Environmental Aspects</a>
<b>Society</b>	14. Employment rights	<a href="#">Human Rights Management</a> <a href="#">Fair Employment Policy Framework and Equal Opportunities</a> <a href="#">Human Resources Performance Data</a> <a href="#">OTE Group Social Charter</a> <a href="#">OTE Group Policy on Employee Relations</a>
	15. Equal opportunities	<a href="#">Human Rights Management</a> <a href="#">Fair Employment Policy Framework and Equal Opportunities</a> <a href="#">Health and Safety</a> <a href="#">OTE Group Social Charter</a>
	16. Qualifications	<a href="#">Approach (Responsible Employment and Development)</a> <a href="#">Employment</a> <a href="#">Employee Selection, Attracting and Retaining Talented Employees</a> <a href="#">Employee Training and Skills Development</a> <a href="#">Human Resources Performance Data</a>
	17. Human rights in the supply chain	<a href="#">Human Rights Management</a> <a href="#">Responsible Procurement and Supply Chain Management</a> <a href="#">OTE Group Social Charter</a>
	18. Corporate citizenship	<a href="#">Group Presentation</a> <a href="#">Connectivity for All</a> <a href="#">Social Contribution</a>
	19. Initiatives and political influence	<a href="#">Memberships, Ratings and Awards</a> <a href="#">Responsible Competition</a>
	20. Corruption prevention and fighting	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>

## Global Reporting Initiative Content Index

The OTE Group 2017 Sustainability Report is “in accordance” with the GRI G4 Guidelines at “core” level.

### General Standard Disclosures

General Standard Disclosures	Report Location / Notes	External Assurance	Index Summary Description
<b>Strategy and Analysis</b>			
<b>G4-1</b>	<a href="#">Message from the Chairman and CEO</a>	✓	Statement from the most senior decision-maker of the organization
<b>Organizational Profile</b>			
<b>G4-3</b>	<a href="#">Report Profile</a>	✓	Name of organization
<b>G4-4</b>	<a href="#">Group Presentation</a>	✓	Brands, products, and services
<b>G4-5</b>	<a href="#">Report Profile</a>	✓	Headquarters location
<b>G4-6</b>	<a href="#">Group Presentation</a>	✓	Countries of operation
<b>G4-7</b>	<a href="#">Group Presentation</a>	✓	Ownership and legal form
<b>G4-8</b>	<a href="#">Group Presentation</a> <a href="#">Connectivity for All</a>	✓	Markets served
<b>G4-9</b>	<a href="#">Group Presentation</a>	✓	Scale of the reporting organization
<b>G4-10</b>	<a href="#">Employment</a> <a href="#">Human Resources Performance Data</a>	✓	Employees by contract, region and gender
<b>G4-11</b>	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>	✓	Employees covered by collective bargaining agreements
<b>G4-12</b>	<a href="#">Responsible Procurement and Supply Chain Management</a>	✓	Supply chain of the organization
<b>G4-13</b>	No significant changes in the reporting period.	✓	Significant changes in reporting period

General Standard Disclosures	Report Location / Notes	External Assurance	Index Summary Description
<b>G4-14</b>	<a href="#">Sustainability Strategy</a> <a href="#">Policies and Management of Enterprise Risk and Compliance</a> <a href="#">Integrated Management System</a> <a href="#">Health and Safety</a> <a href="#">Approach (Sustainable Environment for All)</a>	☑	Precautionary approach
<b>G4-15</b>	<a href="#">Report Profile</a> <a href="#">Memberships, Ratings and Awards</a> <a href="#">Additional Information for GRI Indicators / Memberships</a>	☑	Externally developed economic, environmental and social charters, principles, or other initiatives
<b>G4-16</b>	<a href="#">Memberships, Ratings and Awards</a> <a href="#">Responsible Competition</a> <a href="#">Additional Information for GRI Indicators / Memberships</a>	☑	Memberships of associations and national or international advocacy organizations

#### Identified Material Aspects and Boundaries

<b>G4-17</b>	<a href="#">Report Profile</a> <a href="#">Group Presentation</a>	☑	List all entities included in the organization's consolidated financial statements or equivalent documents
<b>G4-18</b>	<a href="#">Report Profile</a> <a href="#">Materiality Analysis</a>	☑	Process for defining report content and aspect boundaries
<b>G4-19</b>	<a href="#">Materiality Analysis</a> <a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>	☑	Materiality aspects
<b>G4-20</b>	<a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>	☑	Material aspects boundary within the organization
<b>G4-21</b>	<a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>	☑	Material aspects boundary outside the organization
<b>G4-22</b>	<a href="#">Report Profile</a>	☑	Effects and reasons of restated information
<b>G4-23</b>	<a href="#">Report Profile</a>	☑	Significant changes in Report scope, boundary, methods

#### Stakeholder Engagement

<b>G4-24</b>	<a href="#">Stakeholders</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a>	☑	Stakeholder groups engaged by the organization
<b>G4-25</b>	<a href="#">Stakeholders</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a>	☑	Stakeholder identification and selection for engagement

General Standard Disclosures	Report Location / Notes	External Assurance	Index Summary Description
<b>G4-26</b>	<a href="#">Report Profile</a> <a href="#">Sustainability Strategy</a> <a href="#">Stakeholders</a> <a href="#">Materiality Analysis</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a> <a href="#">Customer Service and Satisfaction</a> <a href="#">Employee Communication, Commitment and Satisfaction</a>	☑	Approaches to stakeholder engagement
<b>G4-27</b>	<a href="#">Additional Information for GRI Indicators / Stakeholders</a>	☑	Topics and concerns raised by stakeholders

#### Report Profile

<b>G4-28</b>	<a href="#">Report Profile</a>	☑	Reporting period
<b>G4-29</b>	The most recent published report covers the period from January 1 to December 31, 2016.	☑	Date of most recent report
<b>G4-30</b>	Annual	☑	Reporting cycle
<b>G4-31</b>	<a href="#">Report Profile</a>	☑	Contact point about the Report
<b>G4-32</b>	<a href="#">Global Reporting Initiative Content Index</a>	☑	GRI Content Index
<b>G4-33</b>	<a href="#">Independent Limited Assurance Report to the Management of OTE Group</a>	☑	External assurance policy

#### Governance

<b>G4-34</b>	<a href="#">Corporate Governance</a> <a href="#">Sustainable Development Governance</a> <a href="#">Approach (Sustainable Environment for All)</a>	☑	Governance structure
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#### Ethics and Integrity

<b>G4-56</b>	<a href="#">Sustainability Strategy</a> <a href="#">Policies and Management of Enterprise Risk and Compliance</a> <a href="#">Integrated Management System</a> <a href="#">Additional Information for GRI Indicators / Integrated Management System</a>	☑	Organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics
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## Specific Standard Disclosures

Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
<b>ECONOMIC</b>				
<b>Material Issue: Economic Performance</b>				
<b>G4-DMA</b>	<a href="#">Group Presentation Sustainability Strategy</a>		☑	Disclosure on Management Approach
<b>G4-EC1</b>	<a href="#">Group Presentation</a>		☑	Direct economic value generated and distributed
<b>G4-EC2</b>	<a href="#">Products and Service for Sustainability Energy and Climate Change</a>			Financial implications and other risks and opportunities for the organization's activities due to climate change
<b>G4-EC4</b>	OTE Group companies do not receive any government financial subsidies (except from co-funding contributions from the Greek State and the European Commission for developmental or competitive projects), special tax relief or other government financial support			Financial assistance received from government
<b>Market Presence</b>				
<b>G4-EC5</b>	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>			Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation
<b>G4-EC6</b>	Although OTE Group does not have an officially formulated policy for hiring people from local communities, in practice, locality is taken into account in an effort to further support local communities and promote employee wellbeing. It should also be noted that 75% of Chief Officers and Executive Directors are local citizens.			Proportion of senior management hired from the local community at significant locations of operation
<b>Indirect Economic Impacts</b>				
<b>G4-EC7</b>	<a href="#">Connectivity for All Social Contribution Electromagnetic Fields Other Environmental Aspects</a>			Development and impact of infrastructure investments and services supported
<b>G4-EC8</b>	<a href="#">Products and Service for Sustainability Affordable Prices for All Access to All Social Contribution</a>			Significant indirect economic impacts, including the extent of impacts

Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
<b>Procurement Practices</b>				
<b>G4-EC9</b>	<u>Responsible Procurement and Supply Chain Management</u>			Proportion of spending on local suppliers at significant locations of operation
<b>ENVIRONMENTAL</b>				
<b>Materials</b>				
<b>G4-EN1</b>	<u>Circular Economy</u> OTE Group companies are not actually manufacturing any products themselves, but provide telecommunications services and therefore their use of materials is restricted to paper, packaging materials (for the products placed in the market).			Materials used by weight or volume
<b>G4-EN2</b>				Percentage of materials used that are recycled input materials
<b>Energy</b>				
<b>G4-EN3</b>	<u>Energy and Climate Change</u> <u>Environmental Performance Data - Energy</u>		☑	Energy consumption within the organization
<b>G4-EN5</b>	<u>Energy and Climate Change</u>		☑	Energy intensity
<b>G4-EN6</b>	<u>Energy and Climate Change</u> <u>Environmental Performance Data - Energy</u>			Reduction of energy consumption
<b>G4-EN7</b>	<u>Energy and Climate Change</u>			Reductions in energy requirements of products and services
<b>Water</b>				
<b>G4-EN8</b>	<u>Circular Economy</u>			Total water withdrawal by source
<b>G4-EN9</b>	<u>Circular Economy</u>			Water sources significantly affected by withdrawal of water
<b>G4-EN10</b>	<u>Circular Economy</u>			Percentage and total volume of water recycled and reused

Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
<b>Biodiversity</b>				
<b>G4-EN11</b>	<u>Other Environmental Aspects</u> OTE Group companies are committed to minimizing any potential impact that their activities (fixed and mobile telecommunication installations and offices) might have on biodiversity. In this vein it should be noted that:			Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas
<b>G4-EN12</b>	<ul style="list-style-type: none"> <li>Potential impacts are mainly related to the operation of installations in isolated areas necessary for the reliable provision of telecommunication services (energy consumption, EMF emissions) and infrastructure works for upgrading / maintaining telecommunication network (waste generation).</li> <li>All potential impacts are addressed in the Environmental Impact Assessment studies carried out and submitted for approval to the designated authorities as foreseen by national legislation in force. In these studies, special reference is made to protected areas (NATURA, SPA, RAMSAR, CORINE, IBA) and areas of high biodiversity value that are near to the activities of OTE Group companies. The contents of these studies and the approval process, that includes a public consultation phase, are specified in the relevant legislative acts. These studies, on the basis of current scientific knowledge, conclude that impacts on biodiversity are not material, and therefore there are no protected and / or restored habitat areas that are affected by the operation of OTE Group.</li> <li>The majority of the installations are small, without permanent personnel and with limited transportation activities at the operational stage.</li> </ul>			Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas
<b>G4-EN13</b>				Habitats protected or restored
<b>G4-EN14</b>				Total number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk
<b>Emissions</b>				
<b>G4-EN15</b>	<u>Energy and Climate Change</u> <u>Other Environmental Aspects</u> <u>Environmental Performance Data - Energy</u>		☑	Direct greenhouse gas (GHG) emissions (Scope 1)
<b>G4-EN16</b>	<u>Energy and Climate Change</u> <u>Environmental Performance Data - Energy</u>		☑	Energy indirect greenhouse gas (GHG) emissions (Scope 2)
<b>G4-EN17</b>	<u>Energy and Climate Change</u>			Other indirect greenhouse gas (GHG) emissions (Scope 3)
<b>G4-EN18</b>	<u>Energy and Climate Change</u>		☑	Greenhouse gas (GHG) emissions intensity
<b>G4-EN19</b>	<u>Energy and Climate Change</u> <u>Environmental Performance Data - Energy</u>			Reduction of greenhouse gas (GHG) emissions



Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
<b>G4-EN20</b>	<a href="#">Other Environmental Aspects</a>			Emissions of ozone-depleting substances (ODS)
<b>G4-EN21</b>	<a href="#">Additional Information for GRI Indicators / Direct Non-GHG Emissions</a>			NO <sub>x</sub> , SO <sub>x</sub> , and other significant air emissions
<b>Effluents and Waste</b>				
<b>G4-EN22</b>	<a href="#">Circular Economy</a>			Total water discharge by quality and destination
<b>G4-EN23</b>	<a href="#">Circular Economy</a> <a href="#">Environmental Performance Data - Waste</a>		☑	Total weight of waste by type and disposal method
<b>G4-EN24</b>	<a href="#">Circular Economy</a> There were no significant spills during the management of batteries and lubricants			Total number and volume of significant spills
<b>G4-EN25</b>	<a href="#">Circular Economy</a>			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
<b>G4-EN26</b>	<a href="#">Circular Economy</a>			Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the organization's discharges of water and runoff
<b>Products and Services</b>				
<b>G4-EN27</b>	<a href="#">Electromagnetic Fields</a> <a href="#">Additional Information for GRI Indicators / Noise and Visual Impact</a>			Extent of impact mitigation of environmental impacts of products and services
<b>G4-EN28</b>	Quantities collected (and forwarded for recycling) in Groups' retail network are not limited to OTE Group products, while OTE Group products are also collected in collection points established within other retail outlets, and therefore it is not possible to estimate the percentage of products sold that are actually reclaimed.  OTE Group companies are implementing a product packaging monitoring program for their products distributed in the market, and participate in systems for the management of packaging materials waste, as foreseen by national and European legislation. Therefore, it is not possible for OTE Group companies to know the actual quantities of their packaging materials reclaimed and recycled, as it is the responsibility of these systems to do so.			Percentage of products sold and their packaging materials that are reclaimed by category


Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
<b>Compliance</b>				
<b>G4-EN29</b>	The fines (related to the environment) imposed in 2017 amounted to € 15,736.4, while no non-monetary sanctions or complaints were brought before dispute resolution mechanisms. The aforementioned amount of fines is expected to decrease, due to available judicial procedures.			Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations
<b>Transport</b>				
<b>G4-EN30</b>	<a href="#">Energy and Climate Change Additional Information for GRI Indicators / Direct Non-GHG Emissions Environmental Performance Data - Energy</a>			Significant environmental impacts of transporting products and other goods and materials for the organization's operations, and transporting members of the workforce
<b>Overall</b>				
<b>G4-EN31</b>	Environmental protection expenditures for 2017 amounted to € 997,195 and cover waste treatment, management and disposal, environmental impact assessment studies, external certification of environmental management systems and measurements on electromagnetic fields.			Total environmental protection expenditures and investments by type
<b>Supplier Environmental Assessment</b>				
<b>G4-EN32</b>	<a href="#">Responsible Procurement and Supply Chain Management</a>			Percentage of new suppliers that were screened using environmental criteria
<b>G4-EN33</b>	<a href="#">Responsible Procurement and Supply Chain Management</a>			Significant actual and potential negative environmental impacts in the supply chain and actions taken
<b>Environmental Grievance Mechanisms</b>				
<b>G4-EN34</b>	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>			Number of grievances about environmental impacts filed, addressed, and resolved through formal grievance mechanisms

## SOCIAL: LABOR PRACTICES AND DECENT WORK

<b>Employment</b>				
<b>G4-LA1</b>	<a href="#">Employment Human Resources Performance Data</a>			Total number and rates of new employee hires and employee turnover by age group, gender, and region

Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
G4-LA2	<a href="#">Additional Information for GRI Indicators / Employee Benefits</a>			Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation
G4-LA3	All employees, female and male, returned to their normal duties			Return to work and retention rates after parental leave, by gender
<b>Labor/Management Relations</b>				
G4-LA4	For any significant change in their operation (e.g. reorganization, outsourcing operation, business interruption, expansions, new job positions, acquisitions, sale of all or part of the company, or mergers), OTE Group companies inform or consult the most representative trade unions as appropriate, applying each time the current legislative framework.			Minimum notice periods regarding operational changes, including whether these are specified in collective agreements
<b>Occupational Health and Safety</b>				
G4-LA6	<a href="#">Additional Information for GRI Indicators / Health and Safety Performance</a> <a href="#">Human Resources Performance Data</a>		☑	Type of injury and rates of injury, occupational diseases, lost days and absenteeism, and total number of work-related fatalities
<b>Material Issue: Training and Education</b>				
G4-DMA	<a href="#">Employee Training and Skills Development</a>		☑	Disclosure on Management Approach
G4-LA9	<a href="#">Employee Training and Skills Development</a> <a href="#">Human Resources Performance Data</a>		☑	Average hours of training per year per employee by gender, and by employee category
G4-LA10	<a href="#">Employee Selection, Attracting and Retaining Talented Employees</a> <a href="#">Employee Training and Skills Development</a>			Programs for skills management and lifelong learning
G4-LA11	<a href="#">Employee Selection, Attracting and Retaining Talented Employees</a>			Percentage of employees receiving regular performance and development reviews, by gender and by employee category
<b>Diversity and Equal Opportunity</b>				
G4-LA12	<a href="#">Employment</a> <a href="#">Fair Employment Policy Framework and Equal Opportunities</a> <a href="#">Human Resources Performance Data</a> <a href="#">OTE Group Social Charter</a> <a href="#">OTE Group Policy on Employee Relations</a> Minority group membership is not a material issue for the operation of OTE and COSMOTE in Greece			Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity

Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
<b>Equal Remuneration for Women and Men</b>				
<b>G4-LA13</b>	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>			Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation
<b>Supplier Assessment for Labor Practices</b>				
<b>G4-LA14</b>	<a href="#">Responsible Procurement and Supply Chain Management</a>			Percentage of new suppliers that were screened using labor practices criteria
<b>G4-LA15</b>	<a href="#">Responsible Procurement and Supply Chain Management</a>			Significant actual and potential negative impacts for labor practices in the supply chain and actions taken
<b>Labor Practices Grievance Mechanisms</b>				
<b>G4-LA16</b>	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>			Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms
<b>SOCIAL: HUMAN RIGHTS</b>				
<b>Investment</b>				
<b>G4-HR2</b>	<a href="#">Human Rights Management</a>			Employee training on human rights policies
<b>Non-discrimination</b>				
<b>G4-HR3</b>	<a href="#">Human Rights Management</a>			Total number of incidents of discrimination and corrective actions taken
<b>Freedom of Association and Collective Bargaining</b>				
<b>G4-HR4</b>	<a href="#">Human Rights Management</a> <a href="#">Fair Employment Policy Framework and Equal Opportunities</a> <a href="#">Responsible Procurement and Supply Chain Management</a> <a href="#">OTE Group Social Charter</a> <a href="#">OTE Group Policy on Employee Relations</a>			Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights

Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
<b>Child Labor</b>				
<b>G4-HR5</b>	<a href="#">Human Rights Management</a> <a href="#">Responsible Procurement and Supply Chain Management</a> <a href="#">OTE Group Social Charter</a> <a href="#">OTE Group Policy on Employee Relations</a>			Operations and suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor
<b>Forced or Compulsory Labor</b>				
<b>G4-HR6</b>	<a href="#">Human Rights Management</a> <a href="#">Responsible Procurement and Supply Chain Management</a> <a href="#">OTE Group Social Charter</a>			Operations and suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor
<b>Supplier Human Rights Assessment</b>				
<b>G4-HR10</b>	<a href="#">Responsible Procurement and Supply Chain Management</a>			Percentage of new suppliers that were screened using human rights criteria
<b>G4-HR11</b>	<a href="#">Responsible Procurement and Supply Chain Management</a>			Significant actual and potential negative human rights impacts in the supply chain and actions taken
<b>Human Rights Grievance Mechanisms</b>				
<b>G4-HR12</b>	<a href="#">Human Rights Management</a> <a href="#">Policies and Management of Enterprise Risk and Compliance</a>			Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms
<b>SOCIAL: SOCIETY</b>				
<b>Local Communities</b>				
<b>G4-S01</b>	<a href="#">Social Contribution</a>			Percentage of operations with implemented local community engagement, impact assessments, and development programs
<b>G4-S02</b>	<a href="#">Social Contribution</a> <a href="#">Electromagnetic Fields</a> <a href="#">Other Environmental Aspects</a>			Operations with negative impacts on local communities
<b>Material Issue: Anti-corruption</b>				
<b>G4-DMA</b>	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>			Disclosure on Management Approach

Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
<b>G4-S03</b>	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>		☑	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified
<b>G4-S04</b>	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>			Communication and training on anti-corruption policies and procedures
<b>G4-S05</b>	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>		☑	Confirmed incidents of corruption and actions taken
<b>Public Policy</b>				
<b>G4-S06</b>	According to the OTE Group Code of Conduct, and the relevant policies, OTE Group companies neither donate money to political parties and elected officials, nor do they grant them any monetary value-added benefits. In addition, the use of OTE Group resources and assets for political reasons is not allowed.			Total value of political contributions by country and recipient/beneficiary
<b>Anti-competitive Behavior</b>				
<b>G4-S07</b>	<a href="#">Responsible Competition</a>		☑	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes
<b>Material Issue: Compliance</b>				
<b>G4-DMA</b>	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>		☑	Disclosure on Management Approach
<b>G4-S08</b>	<a href="#">Policies and Management of Enterprise Risk and Compliance</a> <a href="#">Human Rights Management</a> <a href="#">Responsible Competition</a>		☑	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations
<b>Supplier Assessment for Impacts on Society</b>				
<b>G4-S09</b>	<a href="#">Responsible Procurement and Supply Chain Management</a>			Percentage of new suppliers that were screened using criteria for impacts on society
<b>G4-S010</b>	<a href="#">Responsible Procurement and Supply Chain Management</a>			Significant actual and potential negative impacts on society in the supply chain and actions taken
<b>Grievance Mechanisms for Impacts on Society</b>				
<b>G4-S011</b>	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>			Number of grievances about impacts on society filed, addressed, and resolved through formal grievance mechanisms

Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
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**SOCIAL: PRODUCT RESPONSIBILITY**

<b>Customer Health and Safety</b>				
<b>G4-PR1</b>	<a href="#">Responsible Communication with Customers Electromagnetic Fields</a>		✓	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement
<b>G4-PR2</b>	<a href="#">Responsible Communication with Customers Electromagnetic Fields</a>		✓	Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes
<b>Material Issue: Product and Service Labeling</b>				
<b>G4-DMA</b>	Information on customer service and satisfaction is presented as it is a material issue that is related product and service labeling. <a href="#">Customer Service and Satisfaction</a>		✓	Disclosure on Management Approach
<b>G4-PR3</b>	<a href="#">Responsible Communication with Customers</a>			Information regarding products and services
<b>G4-PR4</b>	<a href="#">Responsible Communication with Customers</a>			Non-compliance with regulations and voluntary codes concerning product and service information and labeling
<b>G4-PR5</b>	<a href="#">Customer Service and Satisfaction</a>		✓	Results of surveys measuring customer satisfaction
<b>Marketing Communications</b>				
<b>G4-PR6</b>	<a href="#">Responsible Communication with Customers</a>			Sale of banned or disputed products
<b>G4-PR7</b>	<a href="#">Responsible Communication with Customers</a>			Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes

Specific Standard Disclosures	Report location / Notes	Omissions	External Assurance	Index Summary Description
<b>Material Issue: Customer Privacy</b>				
<b>G4-DMA</b>	<u>Security and Data Privacy</u>		☑	Disclosure on Management Approach
<b>G4-PR8</b>	<u>Security and Data Privacy</u>		☑	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data
<b>Compliance</b>				
<b>G4-PR9</b>	<u>Responsible Communication with Customers</u>			Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services



## Additional Information for GRI Indicators

### Memberships (Relevant for GRI Indicators G4-15, G4-16)

Organization / Initiative	Company	Participation Type
<b>Greece</b>		
Hellenic Network for Corporate Social Responsibility	OTE Group	Member since 2001.
Hellenic branch of UN Global Compact (UNGC)	<u>OTE / COSMOTE</u>	Members since 2008. OTE and COSMOTE have committed, through their CEO, to implement, disclose, and promote the 10 universal principles of UNGC and to release a Communication on Progress (CoP) report annually.
Federation of Hellenic Enterprises (SEV) Council for Sustainable Development	OTE Globe	Member since 2014.
The Sustainable Greece 2020 Initiative	<u>OTE Group</u>	Participation since 2014, as “Ambassadors of Sustainability”. Initiative Sustainable Greece 2020 aims to develop a structured dialogue and the creation of methodologies and tools that will support Greece’s course towards sustainable development at both the microeconomic and macro level.
Corporate Responsibility Institute, Greece	OTE	Member since 2008.
Global Sustain	<u>OTE Group</u>	Member since 2007.
Road Safety Institute «Panos Mylonas» and Roads to the Future» Alliance for safety and courtesy on the road	<u>COSMOTE</u>	Member and sponsor since 2009.
Code of Conduct for value-add-ed services provided through mobile phones and for the protection of juvenile users	COSMOTE	Participant since 2006. In 2008, the Code was adjusted to European Standards.
Association of Mobile Telephony Companies (EECT)	<u>COSMOTE</u>	Founding member since 2008.
Transparency International Romania	Telekom Romania Mobile Communications	Partner since 2010.
United Nations Global Compact - Global Compact Network Romania	<u>Telekom Romania Mobile Communications</u>	Partner since 2015, Vice-President in the Steering Committee. Telekom Romania has committed, through its CEO, to implement, disclose, and promote the 10 universal principles of UNGC and to release a Communication on Progress (CoP) report annually.

Organization / Initiative	Company	Participation Type
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### Europe

European Telecommunications Network Operators' Association (ETNO)	<a href="#">OTE</a>	Founding member of ETNO since 1992 and member of Sustainability Working Group since 2007. OTE signed the Sustainability Charter in 2011.
	<a href="#">Telekom Romania Communications</a>	Member.
European Telecommunications Standards Institute (ETSI)	<a href="#">COSMOTE</a>	Member since 1998.
	<a href="#">Telekom Albania</a>	Member.
ICT Coalition for the Safer Use of Connected Devices And Online Services by Children and Young People in the EU	<a href="#">OTE</a>	Participation, since 2013, as members of Deutsche Telekom Group.
	<a href="#">COSMOTE</a>	
	<a href="#">Telekom Romania Mobile Communications</a>	
	<a href="#">Telekom Romania Mobile Telecommunications</a>	
European Memorandum for Safer Mobile Use by children and younger teenagers	COSMOTE	Participant since 2007.

### Internationally

GeSI (Global e-Sustainability Initiative)	OTE	Member from 2010 up until December 2017.
GSM Association (GSM)	<a href="#">COSMOTE</a>	Member of the World Association of Mobile Communications Services since 1997. COSMOTE actively participates in many of its workgroups.
	<a href="#">Telekom Romania Mobile Communications</a>	Full member.
	<a href="#">Telekom Albania</a>	Member.
International Telecommunication Union (ITU)	<a href="#">OTE</a>	Associated member (OTE has been following ITU activities since the beginning of 1990).
	<a href="#">Telekom Romania</a>	Partner since 2015.
CFSI (Conflict-Free Sourcing Initiative)	<a href="#">OTE</a>	Member from 2010 up until December 2017.

## Materiality Analysis (Relevant for GRI Indicators G4-19, G4-20, G4-21)

Most Important Issues for Management and Stakeholders	Related GRI G4 Issue	Demarcation (Inside / Outside Companies)
1 Economic Performance	Economic Performance	The issue is primarily internal, has an impact on the operation of the companies, and may affect their shareholders, employees, suppliers and customers
3 Corporate Compliance Policies	Anti-corruption, Compliance	The issue is primarily internal, has an impact on the operation of the companies and their employees
6 Business Resilience	-	The issue is primarily internal, has an impact on the operation of the companies, and may affect their shareholders, employees, suppliers and customers
7 Data Security and Privacy	Customer Privacy	The issue is primarily internal and has an impact on the operation of the companies and is likely to affect all their stakeholders.
8 Safe and Responsible Use of Technology	-	The issue is primarily external and has an impact on their customers.
13 Employee Training and Skills Development	Training and Education	The issue is primarily internal, has an impact on the operation of the companies and their employees
18 Customer Service and Satisfaction	Product and Service Labeling	The issue is internal, has an impact on the operation of the companies and their employees, and external as it directly affects their customers

Issue Stakeholder	Corporate Compliance Policies	Employees' Compliance and Grievance Mechanisms	Human Rights	Data Security and Privacy	Safe and Responsible Use of Technology	Employee Health, Safety and Wellness	Employee Training and Skills Development	Research and Innovation	Responsible Communication With Customers	Customer Service and Satisfaction	Electromagnetic Fields (Emf)
Shareholders, Bondholders, Investors and Analysts											
Customers and Prospective Customers											
Employees, Prospective Employees and Their Representatives											
Business											
Science, Research and Education Organizations											
Non Profit Organizations / Ngos											
Media											
State / Government Entities											
Suppliers											

NOTE: The 5 most 'material' issues as identified by stakeholder group. The most important topic for each group is presented in a darker color.

## Stakeholders (Relevant for GRI Indicators G4-24, G4-25, G4-26, G4-27)

### OTE Group Stakeholders

Customers and prospective customers	Business	Science, research and education
<ul style="list-style-type: none"> <li>• Youngsters and young adults</li> <li>• Families</li> <li>• Middle-aged people</li> <li>• Senior citizens</li> <li>• Small and medium-sized enterprises</li> <li>• Large corporations</li> <li>• Telecommunications Service Providers</li> <li>• Public authorities</li> <li>• Consumer organizations and interest groups</li> </ul>	<ul style="list-style-type: none"> <li>• ATHEX-listed companies</li> <li>• Other large corporations</li> <li>• Small and medium-sized enterprises</li> <li>• Trade and industry associations</li> <li>• Co-operation partners, subsidiaries</li> <li>• Competitors</li> </ul>	<ul style="list-style-type: none"> <li>• CR and sustainability research institutions</li> <li>• Public Policy and business research institutions</li> <li>• Universities</li> <li>• Schools</li> <li>• Student organizations and university associations</li> <li>• Technology and Innovation Research Institutions</li> <li>• ICT SMEs</li> </ul>
NGOs and interest groups	Media	State / Government entities
<ul style="list-style-type: none"> <li>• Humanitarian organizations and charities</li> <li>• Business ethics groups</li> <li>• Foundations</li> <li>• Environmental protection organizations</li> <li>• Business non-governmental organizations</li> <li>• CR related organizations</li> </ul>	<ul style="list-style-type: none"> <li>• Daily and weekly newspapers</li> <li>• Newswires and press agencies</li> <li>• TV and radio</li> <li>• Internet, news sites and other interest</li> <li>• Social media and blogs</li> <li>• Journalist associations / media groups</li> <li>• Ownership and media commercial executives</li> </ul>	<ul style="list-style-type: none"> <li>• State institutions</li> <li>• Embassies and consulates</li> <li>• Supervisory and regulatory authorities</li> <li>• Communities, local authorities and their representatives</li> <li>• International organizations</li> <li>• EU level entities</li> </ul>
Employees, prospective employees and their representatives	Suppliers	Analysts and investors
<ul style="list-style-type: none"> <li>• Employees</li> <li>• Board of Directors</li> <li>• Management Board</li> <li>• Management Team</li> <li>• Unions and work councils</li> <li>• Applicants and prospective employees</li> <li>• Scholars and trainees / interns</li> <li>• Universities / students</li> </ul>	<ul style="list-style-type: none"> <li>• First-tier suppliers</li> <li>• Sub-suppliers</li> <li>• Auditors and certification bodies</li> <li>• Consultants</li> </ul>	<ul style="list-style-type: none"> <li>• Shareholders</li> <li>• Bondholders</li> <li>• Financial institutions</li> <li>• Private investors</li> <li>• Funds, asset managers and analysts</li> <li>• Rating agencies</li> <li>• Analyst organizations and associations</li> <li>• Institutional investors</li> </ul>

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE Goup's Responsiveness
<b>Customers and prospective customers</b>	Customer satisfaction surveys	Annual	<ul style="list-style-type: none"> <li>• Activation of products, quality of services (in relation to costs)</li> <li>• Technical support (e.g. web hosting, DNS services, IPVPN)</li> <li>• Commercial and billing issues</li> <li>• Mobile telephony operations</li> <li>• Improving the way customer complaints are handled</li> <li>• Safe use of services</li> <li>• EMF</li> <li>• Responsible Marketing (e.g. consumer rights)</li> <li>• Introduction of new technologies</li> <li>• Data security and privacy</li> <li>• Road reconstructions, retaining walls etc.</li> </ul>	<a href="#">Digital Society</a> <a href="#">Better World for All</a> <a href="#">Electromagneric Fields</a>
	CR surveys	Annual		
	Tracking studies	Quarterly		
	Call centers	Ongoing		
	Customer account managers	Ongoing		
	Social media	Ongoing		
	Sales network	Ongoing		
	Companies' websites	Ongoing		
	Key account managers	Ongoing		
	Presentations on OTE systems	Ongoing		
	Companies' mail boxes	Ongoing		
	Press releases	Ongoing		
	Corporate announcements	Ongoing		
	Business Conferences	Ongoing		
	Business Customer Events	Ongoing		
Advertisements	Ongoing			
Sustainability Report	Annual			

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE Goup's Responsiveness
<b>Business</b>	Press releases	Ongoing	<ul style="list-style-type: none"> <li>• Corporate governance</li> <li>• Economic performance</li> <li>• Market Presence</li> <li>• Procurement Practices</li> <li>• Employment</li> <li>• Joint actions to improve the competitive environment and influence the Greek state policies</li> <li>• Actions to reduce cost and optimize coverage</li> </ul>	<u>OTE Group</u> <u>Digital Society</u> <u>Responsible Employment and Development</u>
	Economic Results Releases	Quarterly		
	Roadshows	Ongoing		
	Meetings	Ongoing		
	Conference calls	Ongoing		
	Annual reports	Annual		
	Presentations	Ongoing		
	Trainings	Ongoing		
	Sustainability Report	Annual		
<b>Science, research and education</b>	Meetings	Frequently	<ul style="list-style-type: none"> <li>• New technology products and services</li> <li>• Communication safety</li> <li>• Technology awareness</li> </ul>	<u>Safe and Responsible Technology Use</u> <u>Research and Innovation</u> <u>Social Contribution</u>
	Conference calls	Ongoing		
	E-mails	Ongoing		
	Dissemination activities (workshops, conferences, etc.)	Frequently		
	Conferences	Ongoing		
	Surveys	Ongoing		
	Sustainability Report	Annual		

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE Goup's Responsiveness
<b>NGOs and interest groups</b>	Meetings	Bi-annually	<ul style="list-style-type: none"> <li>• Importance of adopting CR</li> <li>• Internet Safety public education</li> <li>• Support for vulnerable groups and charities</li> <li>• Social Contribution</li> <li>• EMF, Biodiversity</li> <li>• Environmental performance</li> </ul>	<u>Sustainability Report (all sections)</u>
	CR surveys	Annual		
	Conferences	Ongoing		
	E-mails	Ongoing		
	Working groups	Ongoing		
	Consultation	Ongoing		
	Sustainability Report	Annual		
<b>Media</b>	Announcements / Press releases	Ongoing	<ul style="list-style-type: none"> <li>• Management</li> <li>• HR issues</li> <li>• Industry developments and market structure</li> <li>• Technology advances/network infrastructure</li> <li>• New product launches</li> <li>• TV market</li> <li>• Technology and telecommunications</li> <li>• Business and finance policies</li> <li>• Culture</li> <li>• CR</li> </ul>	<u>Sustainability Report (all sections)</u>
	Informational material	Ongoing		
	Events / Press conferences	Ongoing		
	Other media contacts	Ongoing		
	CR surveys	Annual		
	Sustainability Report	Annual		



Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE Goup's Responsiveness
<b>State / Government entities</b>	Consultations on proposed laws and regulatory frameworks for telecommunication markets	Ongoing	<ul style="list-style-type: none"> <li>• Implementation of regulatory measures applying to OTE</li> <li>• Issues of effective regulatory adjustment</li> <li>• Specialized national goals for European Digital Agenda Strategy</li> <li>• Transparency</li> <li>• Governance</li> <li>• Economic growth</li> <li>• Energy and environment</li> <li>• Infrastructure construction and maintenance</li> <li>• Social security</li> </ul>	<a href="#">Corporate Governance</a> <a href="#">Policies and Management of Enterprise Risk and Compliance</a> <a href="#">Responsible Competition</a> <a href="#">Connectivity for All</a> <a href="#">Responsible Communication with Customers</a> <a href="#">Social Contribution</a> <a href="#">Sustainable Environment for All</a>
	Written or verbal communication with regulatory and public sector bodies	Ongoing		
	Dialogue with representatives of national and local authorities	Ongoing		
	CR surveys	Annual		
	Attendance in associations and unions	Ongoing		
	Systematic liaison with local authorities (mostly regional)	Ongoing		
	Sustainability Report	Annual		

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE Goup's Responsiveness
<b>Employees, prospective employees and their representatives</b>	OTE Group companies' Intranets	Ongoing	<ul style="list-style-type: none"> <li>• Labor cost rationalization and alignment</li> <li>• Organizational effectiveness</li> <li>• Collective Labour Agreements</li> <li>• Fair employment policy (diversity, work-life balance, non-discrimination, equal opportunities)</li> <li>• Health and Safety</li> <li>• Employee development</li> <li>• Leadership</li> <li>• Training</li> <li>• Performance management</li> <li>• Recruitment</li> <li>• Talent management</li> <li>• Engagement and satisfaction</li> <li>• Employees benefits</li> <li>• Corporate volunteerism</li> <li>• Strategy and all corporate information dissemination</li> <li>• Compliance issues</li> <li>• Security matters</li> </ul>	<a href="#">Sustainability Strategy</a> <a href="#">Security and Data Privacy</a> <a href="#">Responsible Employment and Development</a> <a href="#">Employee Volunteering</a>
	Decisions on all important Company issues	Ongoing		
	Meetings with employees	Ongoing		
	Negotiations with unions and work councils	Periodic		
	Emails from the CEO-Chairman and General Directors	Periodic		
	Employee satisfaction surveys	Biennial		
	Employee surveys results roll out and follow up process	Periodic		
	CR surveys	Annual		
	Events	Periodic		
	Performance appraisal system	Annual		
	Trainings	Ongoing		
	Feedback tools	Ongoing		
	Other surveys	Annual		
	Workshops / labs	Periodic		
	Formal company policies / processes	Ongoing		
	Newsletter (electronic))	Bi-weekly		
Internal Communication Campaigns	Ongoing			
Sustainability Report	Annual			

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE Goup's Responsiveness
<b>Suppliers</b>	Consultation and dialogue on procurement policy / supplier code of conduct issues	Ongoing	<ul style="list-style-type: none"> <li>• Tender criteria and competitions</li> <li>• Communication on supplies issues</li> <li>• Transparency</li> <li>• Market Policy</li> <li>• Economic growth</li> <li>• Inserting CR criteria, including environmental criteria</li> <li>• Procurement best practices</li> <li>• Procurement trends</li> </ul>	<u>OTE Group</u> <u>Responsible Procurement and Supply Chain Management</u>
	Attendance in sector-based unions	Ongoing		
	Meetings	Ongoing		
	CR surveys	Annual		
	Suppliers' evaluation	Ongoing		
	Negotiations	Ongoing		
	Presentation of new products	Ongoing		
	Consultation and dialogue on technical issues	Periodic		
	Sustainability Report	Annual		

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE Goup's Responsiveness
<b>Analysts and investors</b>	Investor Relations Department communication	Ongoing	<ul style="list-style-type: none"> <li>• Financial performance</li> <li>• Short and longer term outlook</li> <li>• Competitive environment</li> <li>• Cashflow</li> <li>• Debt issuance and repayment</li> <li>• Dividends</li> <li>• Group strategy and results</li> <li>• Outlook on labor relations, regulatory decisions, economic conditions</li> <li>• Climate change policy</li> </ul>	<u>Sustainability Report (all sections)</u>
	Annual General Shareholders Meeting	Annual		
	Annual, Corporate governance report and Sustainability Report	Annual		
	CR surveys	Annual		
	Participation in corporate responsibility ratings	Ongoing		
	Private meetings	Ongoing		
	Conference Calls	Quarterly		
	Meetings of executives	Ongoing		
	Adoption and implementation of policies and principles	Ongoing		
	Daily collaboration	Ongoing		
	Conferences arranged by brokers	Regularly		
	Dedicated Website ( <a href="http://www.otewholesale.gr">www.otewholesale.gr</a> )	Ongoing		
	Sales Department	Ongoing		
	OTE Systems presentations to telecom provider	Ongoing		
	Special mail box ( <a href="mailto:otewholesale@ote.gr">otewholesale@ote.gr</a> )	Ongoing		
Press Releases	Ongoing			
Corporate announcements	Ongoing			

## Integrated Management System (Relevant for GRI Indicator G4-56)

Standard Certification in 2017	OTE Group								
	OTE	COSMOTE	GERMANOS	COSMOTE e Value	OTE Academy	Telekom Romania Communications	Telekom Romania Mobile Communications	e Value International	Telekom Albania
Integrated Management System, as per PAS99	●	●							
Quality Management, as per ISO 9001	●	●	●*	●	●	●	●	●	●
Environmental Management, as per ISO 14001	●	●	●*			●	●		●
Health & Safety at work, as per OHSAS 18001	●	●	●*			●	●		●
Information Security, as per ISO 27001	●	●	●			●	●		
IT Service Management, as per ISO 20000		●				●	●		
Business Continuity Management, as per ISO 22301	●	●				●	●		
Energy Management, as per ISO 50001	●	●							
Risk Management, as per ISO 31000	●	●				●	●		
Anti-bribery Management, as per ISO 37001	●	●				●	●		●
Compliance Management, as per ISO 19600	●	●				●	●		●
Laboratory Measurements of the Electromagnetic Radiation, as per ISO 17025		●							
Assurance Reports on Controls at a Service Organization, as per ISAE 3402 (SOC 1 TYPE II) and ISAE 3000 (SOC 2 TYPE II and SOC 3)	●	●							
Principles and Guidelines for Good Distribution Practice of Medical Devices, acc. to Decision 1348/04 of the Greek Ministry for Health and Welfare	●	●							

\* Owned stores only

## Employee Benefits (Relevant for GRI Indicator G4-LA2)

A number of employee benefits are offered to OTE Group employees. The benefits vary per company. The following table presents the main benefits offered to OTE Group employees.

### Main Benefits to OTE Group employees per category in 2017

#### Insurance

Health insurance program for employees and dependents  
Life insurance program for all employees  
Pension plan

#### Group products and services

Corporate mobile phone and handset subsidy  
Fixed telephony packages, internet and COSMOTE TV for employees, but also ability to purchase company products at special prices  
Ability to purchase products through the Group's stores with special discounts

#### Other benefits

Provision of special prices for goods and services of other companies  
Offering, through a draw, of tickets to sporting and cultural events  
Issuing of food vouchers  
Staff bus for transportation of personnel to and from subway stations and commuter rail  
Provision of multi-trip card or e-PASS, for employees in the Paiania building  
Ability to use dining services in restaurants / coffee and quick food canteens, through central Group premises

#### Family

Allowance for child care and nursery costs  
Saving program through the "Youth Account" program  
Wedding gift  
Financial support of employees  
Financial rewards for graduation with high honors of employees' children from public institutions of higher education or language training  
Financial rewards for employees' children, who excel in institutions of higher education  
Implement special policies for working mothers and people with disabilities  
Special support for large families  
Financial support through "Fund for Mutual Help" for health expenses  
Christmas and easter gifts to employees' children  
Privileged mobile program for employees' children who are students  
Gift for new born babies  
Medical examination for family members

## Main Benefits to OTE Group employees per category in 2017

### Free time - Vacation

Through OPAKE, OTE offers its employees stay in privately owned resorts and at selected hotels in Greece and abroad

### Athletics – Wellness facilities

Ability to participate in team sport activities in Athens:

- Internal championship in 5x5 football and external corporate championships in basketball and volleyball
- Tennis games between employees of our company
- Running training team for 5/10/42 km

Ability to participate in wellness and fitness programs:

- Daily training at an integrated gym at Paiania premises
- Soft physical exercise programs at Headquarters
- Nutrition care programs at Headquarters and Paiania premises
- Sport club membership card

## Health and Safety Performance (Relevant for GRI Indicator G4-LA6)

### 2017 Health and Safety Performance

	OTE	COSMOTE	OTE Group
<b>Fatalities</b>			
Employee Fatalities	None	None	1
Contractor Fatalities	Not available data	Not available data	Not available data
<b>Work Related Accidents (employees)</b>			
<b>Number of Employees Injured</b>	<b>54</b>	<b>9</b>	<b>87</b>
Men	45	3	57
Women	9	6	30
<b>Injury Rate <sup>1</sup></b>	<b>0.69</b>	<b>0.44</b>	<b>0.48</b>
Men	0.81	0.29	0.52
Women	0.39	0.59	0.42
<b>Occupational Disease Rate <sup>2</sup></b>	<b>0</b>	<b>0</b>	<b>0</b>
Men	0	0	0
Women	0	0	0
<b>Lost Day Rate <sup>3</sup></b>	<b>25.50</b>	<b>15.54</b>	<b>14.52</b>
Men	25.24	19.59	17.00
Women	26.14	11.48	10.71
<b>Absentee Rate <sup>4</sup></b>	<b>654.26</b>	<b>697.53</b>	<b>647.51</b>

NOTES:

1 Injury rate = (Total number of injuries / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks for 40 hours per 100 employees. The data do not include minor (first-aid level) injuries

2 Occupational diseases rate = (Total number of occupational diseases cases / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks for 40 hours per 100 employees.

3 Lost day rate = (Total number of lost calendar days / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks for 40 hours per 100 employees. Lost days count begins on the day of the injury or the next day, depending on the time of the day that the injury occurs.

4 Absentee rate = (Total number of missed absentee days / Total number of workforce days worked) x 25,000. The factor 25,000 is derived from 50 working weeks for 5 days per 100 employees. This rate is not monitored per gender.



## Noise and Visual Impact (Relevant for GRI Indicator G4-EN27)

### Noise

In general, the noise impact from the activities of OTE Group companies is insignificant, as it is restricted to (a) the operation of electricity generators that are necessary in cases of power outage or when there is no reliable electricity supply, (b) ventilation systems (e.g. supply and exhaust units) and (c) the outdoor air-conditioning units located in building roofs, facades and open spaces (e.g. cooling towers).

- The operation of electricity generators in urban areas is in line with the provisions foreseen by legislation. In special cases, where sound levels from generators should be reduced, soundproofing constructions or hybrid systems are installed, to reduce the operating hours of the generators, or replace old units with new, more advanced ones that operate at lower noise levels.
- In order to reduce noise levels from ventilation and/or cooling systems to the levels foreseen by legislation, soundproofing constructions are placed or old units are replaced with new, more advanced ones that operate at lower noise levels.

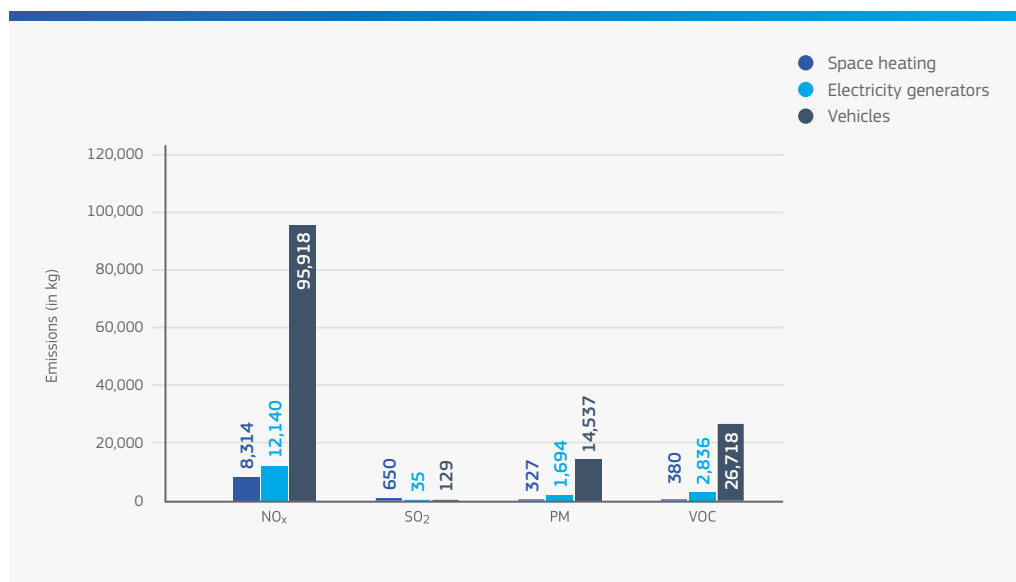
### Visual Impact

Telecommunications companies have relatively small visual impact on the environment. However, to minimize whatever impact may exist:

- The size of new Base Stations being built now has been decreased
- Efforts are made to collocate Base Stations in common installations with the other telephony companies so as to reduce all potential impacts, including overall visual impact of mobile Base Stations (6 collocation cases in Albania)
- For the installation of new telecommunication infrastructure necessary for the provision of communication services, all efforts are made, to the extent that is technically feasible, to minimize the visual intrusion produced, especially in urban areas by appropriate arrangements and constructions that blend well with the surrounding environment (150 special constructions in Greece).
- Appropriate modifications are also applied to existing telecommunication infrastructure (2 special constructions in Greece).

## Direct Non-GHG Emissions (Relevant for GRI Indicator G4-EN21)

- Emissions of typical air pollutants (NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub> and VOCs) are mainly related to road transportation and the use of electricity generators to support the operation of the telecom network.
- Emissions of Persistent Organic Pollutants (POP) and Hazardous Air Pollutants (HAP) are of minor importance as:
  - Transformers and capacitors which could have been a significant source of PCB (Polychlorinated biphenyls) emissions due to leakage, have been decommissioned, disposed of and replaced by new ones that do not contain PCB, in line with the provisions of legislation in force.
  - The vehicles fleet of OTE Group companies do not include vehicles using leaded gasoline.



## Independent Assurance Report

### Independent Limited Assurance Report to the Management of OTE Group

KPMG Advisors A.E. was engaged by OTE Group, and in particular by Hellenic Telecommunications Organization S.A. (further referred to as “OTE”) and COSMOTE Mobile Telecommunications S.A. (further referred to as “COSMOTE”) to provide limited assurance over selected aspects of the English version of the OTE Group sustainability report 2017 titled “OTE Group Sustainability Report 2017” (further referred to as the “Report”) for the reporting period 1 January 2017 - 31 December 2017.

### Scope of our assurance engagement

Our engagement was designed to provide limited assurance in accordance with ISAE 3000<sup>1</sup> and the requirements for a Type 2 assurance engagement under AA1000AS (2008)<sup>2</sup> on the following aspects of the Report (assurance scopes) for OTE, COSMOTE and selected OTE Group entities’ data on a sample basis:

1. The application of AA1000APS (2008)<sup>3</sup> principles, as described in the section titled “Accountability Principles Standard AA1000 Index” of the Appendix of the Report.
2. The reliability of the General Standard Disclosures required by GRI G4 for the “Core” option marked with the symbol “√” in the GRI Content Index table of the Appendix of the Report.

3. The reliability of the following Specific Standard Disclosures for the “Material Aspects”, as they have been identified by OTE Group and their stakeholders, marked with the symbol “√” in the GRI Content Index table of the Appendix of the Report:

- Economic Performance (Disclosure on Management Approach –“DMA”- and Indicator G4-EC1),
- Training and Education (DMA and Indicator G4-LA9),
- Anti-Corruption (DMA and Indicators G4-SO3, G4-SO5),
- Compliance (DMA and Indicator G4-SO8),
- Product Service and Labeling (DMA and Indicator G4-PR5),
- Customer Privacy (DMA and Indicator G4-PR8).

4. The reliability of the following Specific Standard Disclosures marked with the symbol “√” in the GRI Content Index table of the Appendix of the Report: G4-EN3, G4-EN5, G4-EN15, G4-EN16, G4-EN18, G4-EN23, G4-LA6, G4-SO7, G4-PR1 (referring to EMF issues), G4-PR2 (referring to EMF issues).

5. The reliability of the consolidation method used to include OTE Group quantitative data into the Report for the above mentioned Specific Standard Disclosures.

6. The Report has been developed taking into account the United Nations Global Compact Advanced level criteria as described in the respective table of the section titled “United Nations Global Compact – Communication on Progress (CoP)” of the Appendix of the Report.

The nature, timing and extent of evidence-gathering procedures for limited assurance is less than for reasonable assurance, and therefore a lower level of assurance is provided for the data and objectives under the limited assurance scope. Readers should note that

moderate level of assurance in AA1000AS (2008) is consistent with limited assurance in ISAE 3000.

OTE Group and the entities comprising it, is defined within the Report. Our work for the above scopes concerned primarily the operations and activities of OTE and COSMOTE in Greece as well other OTE Group entities as defined in the Report as OTE Group. We have not been engaged to provide assurance over any prior reporting period data or information presented in the Report.

### Reporting criteria used by OTE Group

OTE Group applies the AA1000APS (2008) criteria for the three principles of inclusivity, materiality and responsiveness as described in the section titled “Accountability Principles Standard AA1000 Index” of the Appendix of the Report.

For the Report, OTE Group applies the Sustainability Reporting Guidelines (G4) of the GRI as declared in the section of the Report titled “Report Profile” as well as relevant internal guidelines.

In addition, OTE Group companies follow the United Nations Global Compact Advanced criteria taking them into account for the development of the Report as described and declared in the section titled “United Nations Global Compact – Communication on Progress (CoP)” of the Appendix of the Report.

Our conclusions are based on the appropriate application of the abovementioned criteria.

### Exclusions from the scope of our assurance engagement

The scope of our work did not include the financial data of OTE Group nor of any of its consolidated entities contained in the Report, which are subject to the statutory auditor’s responsibility. Where financial information (text and/ or data) subject to the statutory auditor’s scope has been utilized within the scope of

our work, KPMG’s work was limited to the reliability check of the transfer of these text/ data from the audited and published Financial Statements 2017 of OTE Group to the relevant –within our agreed scope- sections of the Report. To obtain a thorough understanding of OTE Group’s financial results and financial position, the relevant 2017 audited financial statements (separate and consolidated) should be consulted.

The scope of our work did not include the review / testing of the operating effectiveness of the information systems used to collect and aggregate data in relation to the agreed assurance scope.

### Assurance standards we used

We conducted our engagement in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS (2008). A Type 2 Assurance Engagement covers not only the nature and extent of the organization’s adherence to the AA1000APS (2008), but also evaluates the reliability of selected sustainability performance information.

As explained in more detail at the section “Responsibilities”, we conducted our engagement in accordance with the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA) which requires, among other things, the independence of the members of the assurance team and of the assurance organization, including not being involved in writing the Report. The Code contains detailed requirements regarding the integrity, objectivity, confidentiality and professional competence and behavior. KPMG has internal systems and processes to monitor compliance with this Code and to prevent potential conflicts regarding independence. Our engagement was conducted by a multidisciplinary team with extensive experience in sustainability (including

1 International Standard on Assurance Engagements (ISAE) 3000: Assurance Engagements other than Audits or reviews of Historical Financial Information, issued by the International Auditing and Accounting Standards Board.

2 AA1000 Assurance Standard (2008), issued by AccountAbility.

3 AA1000 Principles Standard (2008), issued by AccountAbility.

environmental, social and financial aspects) and sustainability assurance.

## Work performed to reach our conclusions

We planned and performed our work to obtain all the evidence, relevant documentation, information and explanations that we considered necessary in relation to the above scope. Our work primarily concerned OTE and COSMOTE in Greece and included the following procedures using a range of evidence gathering activities which are further explained below:

- Inquiries of management to gain an understanding of OTE Group's processes for determining the material issues for its key stakeholder groups inclusive of an evaluation of the results of OTE Group's stakeholder consultation processes and their methodology.
- Interviews with senior management and relevant managerial staff of OTE Group concerning sustainability strategy and policies for material issues and the implementation of these across the business.
- Interviews with relevant OTE Group representatives and staff responsible for providing information in the Report, during which we also reviewed on a sample basis, systems and/ or processes for information management, internal control and processing of the qualitative and quantitative information, at the company level (OTE, COSMOTE). In this context, we tested on sample basis, the reliability of the underlying text and/ or data references mentioned in the General Standard Disclosures and the Specific Standard Disclosures of our agreed assurance scope.
- Review on a sample basis, of the table in the section titled "United Nations Global Compact – Communication on Progress (CoP)" of the Appendix of the Report in

relation to the relevance of its cross-references within the Report with the respective United Nations Global Compact Advanced level criteria.

- Enquiring, on a sample basis, about OTE Group's assertions within our agreed assurance scope through evidence collection, covering internal and external documentation such as correspondence, minutes of meetings, reports, presentations and research and survey results.
- Visits to the central offices of OTE Group in Athens, which were selected on the basis of a risk analysis including the consideration of both quantitative and qualitative criteria.
- A media analysis and an internet search for references to OTE Group selected companies (OTE and COSMOTE) during the reporting period.
- Review of the Report and in relation to the assurance scope mentioned above, to ensure there are no material disclosures that are misrepresented or inconsistent with our findings.
- Review, on a sample basis, of the quantitative data reported for the following indicators by OTE, COSMOTE, Telekom Romania Communications S.A., Telekom Romania Mobile Communications S.A. and Telekom Albania S.A.:
  - Employees covered by collective bargaining agreements (%).
  - Women employees (%).
  - Fatal work accidents (number of employees).
  - Non-fatal work accidents (number of employees).
  - Court convictions for corruption against the company or its employees in relation to their professional activities (number of convictions).
  - Social contribution (€).
  - Electricity consumption (GWh).

- Direct and indirect CO<sub>2</sub> emissions from energy (t).
- Recycling of phone devices and accessories (t).
- EMF measurements (number of measurements).
- Suppliers evaluated (% of the annual procurement value).

These data are included within the Report as part of the relevant GRI General or Specific Standard disclosures.

- Review, on a sample basis, of the consolidation method (e.g. spreadsheets, etc.) used to include OTE Group quantitative data into the Report for the GRI Specific Standard Disclosures within our assurance scope.

## Our conclusions

The following conclusions should be read in conjunction with the work performed and scope of our assurance engagement described above.

### Assurance scope 1: On the AA1000APS principles of Inclusivity, Materiality and Responsiveness (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that OTE Group's description of its alignment with the AA1000APS (2008) principles in the section titled "Accountability Principles Standard AA1000 Index" of the Appendix of the Report, is not fairly stated in all material respects. Without affecting our conclusion, the following are recommended:

- In relation to the principle of inclusivity, OTE Group could further enhance their current approach to stakeholder engagement by considering the introduction of focus groups in conjunction with the materiality analysis, in the context of maximizing their capacity to engage.
- In relation to the principle of materiality,

OTE Group should maintain the current procedures capitalizing on the investment they have already made regarding the incorporation of Enterprise Risk Management principles into sustainability materiality assessment.

- In relation to the principle of responsiveness, OTE Group could further communicate in the sustainability report, their approach of addressing different expectations and/ or conflicting stakeholder interests.

### Assurance scopes 2, 3 and 4: On the reliability of the General Standard Disclosures and the Specific Standard Disclosures marked with the symbol "√" in the GRI Content Index table of the Appendix of the Report (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that the General Standard Disclosures and the Specific Standard Disclosures marked with the symbol "√" in the GRI Content Index table of the Appendix of the Report, are not fairly stated in all material respects.

### Assurance scope 5: On the reliability of the consolidation method used to include OTE Group quantitative data into the Report for the GRI Specific Standard Disclosures within our assurance scope (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that the consolidation method (e.g. spreadsheets, etc.) used to include OTE Group quantitative data into the Report for the GRI Specific Standard Disclosures within our assurance scope, is not fairly applied in all material respects.

### Assurance scope 6: The Report has been developed taking into account the United Nations Global Compact Advanced level criteria (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that in the development of the Report, OTE Group companies have not taken into account the criteria of the Global Compact Advanced level in all material respects, as described in the respective table of the section titled “United Nations Global Compact – Communication on Progress (CoP)” of the Appendix of the Report.

Without prejudice to our conclusions for all the assurance scopes, as presented above, we provide OTE Group management with an internal memo presenting in more detail specific findings and areas for improvement.

### Responsibilities

OTE Group’s Management are responsible for preparing the Report, and the information and statements within it. They are responsible for the identification of stakeholders and material issues, for defining objectives with respect to sustainability performance and for establishing and maintaining appropriate performance management and internal control systems from which reported information is derived.

Our responsibility is to carry out a limited assurance engagement and to express a conclusion based on the work performed for the agreed scope, as described above. We conducted our engagement in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS (2008). ISAE 3000 standard requires that we plan and perform the engagement to obtain limited assurance about whether selected aspects of the Report are free from material misstatement. KPMG applies ISQC 1<sup>4</sup> and accordingly

maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

Our assurance report is made solely to OTE Group in accordance with the terms of our engagement. Our work has been undertaken so that we might state to OTE and COSMOTE those matters we have been engaged to state in this assurance report and for no other purpose. We do not accept or assume responsibility to anyone other than Hellenic Telecommunications Organization S.A. and COSMOTE Mobile Telecommunications S.A. for our work, for this assurance report, or for the conclusions we have reached.

KPMG Advisors A.E.



George Raounas  
Partner  
Athens, June 7 2018



<sup>4</sup> International Standard on Quality Control 1 (ISQC 1): Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements, issued by the International Auditing and Assurance Standards Board.

Hellenic Telecommunications Organisation S.A.  
99, Kifissias Ave., 15124 Maroussi, Athens, Greece  
[cosmote.gr](http://cosmote.gr)