



GROUP OF COMPANIES



Augmented and virtual reality  
at OTE Group Telecommunications Museum

# Appendix

## Sustainability Report 2018

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## 2018 Performance

2018 Goals	2018 Performance	
<b>OTE Group</b>		
OTE Group: Sustainability Report according to new GRI standards	F	See <a href="#">Report Profile</a> and <a href="#">Global Reporting Initiative Content Index</a>
OTE Group: Enhance Stakeholder approach	F	See <a href="#">Stakeholder Dialogue</a>
OTE-COSMOTE: Promote further Sustainability Team role	F	See <a href="#">Governance</a>
OTE-COSMOTE: COSMOTE One App and What's up App to exceed 2 million monthly active users	F	See <a href="#">Sustainability Business Model</a>
OTE-COSMOTE: e-Bill penetration to 50% of customer base	IP	By the end of 2018, 44.5% of the customers received their bills electronically. See <a href="#">Sustainability Business Model</a>
OTE-COSMOTE: OTE-COSMOTE: Introduce digital workplace features for companies' employees (Mobile App, Collaboration tools and platforms)	F	See <a href="#">Sustainability Business Model</a>
<b>Responsible Business</b>		
OTE Group: Maintain the attestations according to ISO 31000:2009 "Risk Management - Principles and Guidelines" standard	F	See <a href="#">Enterprise Risk Management</a>
OTE Group: Further enhance compliance awareness within the company	F	See <a href="#">Policies and Management of Regulatory Compliance</a>
OTE Group: New Code on Human Rights and Social Principles, OTE Group	F	See <a href="#">Human Rights Management</a>
OTE Group: Redesign Business Continuity and Disaster Recovery plans and validate them	F	See <a href="#">Business Continuity</a>
OTE-COSMOTE: Compliance with the General Data Protection Regulation (GDPR)	F	See <a href="#">Security and Data Protection</a>
OTE-COSMOTE: Usage of User Behavior Analytics (UBA) to analyze and detect malicious user actions	IP	Installation and usage of a User Behavior Analytics (UBA) tool. The fine tuning of the tool will be completed in the 2019.
<b>Employees</b>		
OTE-COSMOTE: Develop a culture of ongoing learning, sharing knowledge and best practice	F	See <a href="#">Human Resources Management</a> and <a href="#">Employee Training and Skills Development</a>
OTE-COSMOTE: Develop employees by enhancing Digital Skills and providing Rotation programs	F	See <a href="#">Employee Training and Skills Development</a>
OTE-COSMOTE: Set the basis for virtual collaboration and matrix teams and simplify internal processes	F	See <a href="#">Human Resources Management</a>
<b>INDEX KEY:</b> F = Fully, P = Partially, IP = In Progress, N = Not achieved		

## 2018 Goals

## 2018 Performance

### Customers

OTE-COSMOTE: Internal development on IoT and testing of 5G technologies	F	OTE Group performed enhancements on IoT testbed functionalities, deployed the IoT solution internally to the Group (energy management and automation) and participated in 5G experimentation during the 5G-PPP projects.
OTE-COSMOTE: Contribution to technology superiority for a better world for all	F	OTE Group participated in 26 pioneering EU funded research projects dealing with a wide range of emerging technologies (5G, IoT, quantum computing, security, etc.). See <a href="#">Products and Services for Sustainability</a>
OTE-COSMOTE: Handling of at least 70% of complaints within 2 days	P	See <a href="#">Customer Service and Satisfaction</a>

### Society

OTE-COSMOTE: Educational programs for the enhancement of Digital Skills for all ages	F	See <a href="#">Digital Skills for All</a>
OTE-COSMOTE: Development of programs for the enhancement of entrepreneurial skills of small-medium enterprises and young entrepreneurs	F	See <a href="#">Digital Skills for All</a>
OTE-Group: Support of vulnerable Social Groups and programs that contribute to Society	F	See <a href="#">Access to Digital Society and Social Programs</a>

### Climate and Environment

OTE Group: 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.	F	See <a href="#">Energy and Climate Change Environmental Performance Data – Energy</a>
OTE Group: Implementation of the revised environmental risk assessment methodology in telecom companies.	F	See <a href="#">Environmental Strategy</a>
OTE-COSMOTE: Reduction of CO <sub>2</sub> emissions (scope 1 and scope 2) by 10% compared to 2008 levels.	F	Scope 1 and scope 2 CO <sub>2</sub> emissions from energy consumption of OTE and COSMOTE decreased by 18%, compared to 2008. See <a href="#">Energy and Climate Change</a>
OTE-Group: Stabilization of electricity consumption in the telecom network at 2017 levels.	N	See <a href="#">Energy and Climate Change</a>
OTE-COSMOTE: Improvement of energy performance of vehicles fleet by 5%.	N	Energy performance of vehicles fleet remained at 2017 levels.
OTE-Group: Recycling of 100% of hazardous and technical waste withdrawn.	F	See <a href="#">Circular Economy</a>
COSMOTE: Installation of 4 additional EMF measurement stations.	F	See <a href="#">Electromagnetic Fields</a>
OTE: Relocation and operational upgrade of the new OTE plant for the refurbishment of end devices (ADSL & VDSL modems, TV decoders).	F	See <a href="#">Circular Economy</a>

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

## Accountability Principles Standard AA1000 Index

Principle Applied	Methods	Report Location
Inclusivity	Identification of key stakeholders and dialogue to understand key issues	<a href="#">Sustainability Business Model</a> <a href="#">Materiality and Stakeholder Dialogue</a> <a href="#">Additional Information for GRI Indicators</a>
Materiality	Identification of issues which are important to the company and its stakeholders	<a href="#">Sustainability Business Model</a> <a href="#">Materiality and Stakeholders</a> <a href="#">Additional Information for GRI Indicators</a>
Responsiveness	Responsiveness to key issues and transparency on performance	<a href="#">Sustainability Business Model</a> <a href="#">Materiality and Stakeholders</a> <a href="#">Additional Information for GRI Indicators</a>
Impact	Analysis of direct and indirect impact of the company's actions.	<a href="#">Sustainability Business Model</a> <a href="#">Performance and Targets</a> <a href="#">Materiality and Stakeholder Dialogue</a> <a href="#">Digital Skills for All</a> <a href="#">Circular Economy</a>

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

OTE Group, Greece's largest technology organization, has incorporated the 10 Principles of the UN Global Compact to its operations and everyday activities. Adhering to key principles regarding human rights, labor, environmental protection and anti-corruption is key to our vision to create a better world for all, through technology and innovation.

**Michael Tsamaz**  
Chairman and CEO of OTE Group

Since 2008, both 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 2018 Sustainability Report includes a detailed presentation of the companies' priorities, activities, goals and outcomes, responding to all 21 criteria of Advanced CoP.



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 Business Model</a>
2 The COP describes value chain implementation	<a href="#">Responsible Purchasing 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="#">Employees</a>
7 The COP describes effective management systems to integrate the labour principles	<a href="#">Employees</a>
8 The COP describes effective monitoring and evaluation mechanisms of labour principles integration	<a href="#">Employees</a>
<b>Robust Labour Management Policies &amp; Procedures</b>	
9 The COP describes robust commitments, strategies or policies in the area of environmental stewardship	<a href="#">Climate and Environment</a>
10 The COP describes effective management systems to integrate the environmental principles	<a href="#">Climate and Environment</a>
11 The COP describes effective monitoring and evaluation mechanisms for environmental stewardship	<a href="#">Climate and Environment</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 Regulatory Compliance</a>
13 The COP describes effective management systems to integrate the anti-corruption principle	<a href="#">Policies and Management of Regulatory Compliance</a>
14 The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption	<a href="#">Policies and Management of Regulatory 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="#">Sustainability Business Model, Performance and Targets</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="#">Policies and Management of Regulatory, Compliance, Connectivity for All</a>
18 The COP describes partnerships and collective action	<a href="#">Awards and Memberships, Additional Information for GRI Indicators</a>
<b>Corporate Sustainability Governance and Leadership</b>	
19 The COP describes CEO commitment and leadership	<a href="#">Governance</a>
20 The COP describes Board adoption and oversight	<a href="#">Governance</a>
21 The COP describes stakeholder engagement	<a href="#">Stakeholder Dialogue, 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 2018 Sustainability Report

Theme	Criteria	Report Location
Strategy	1. Strategic analysis and action	<a href="#">Sustainability Business Model</a>
	2. Materiality	<a href="#">Stakeholder Dialogue</a>
	3. Objectives	<a href="#">Performance and Targets, 2018 Performance</a>
	4. Value chain management	<a href="#">Responsible Purchasing and Supply Chain Management</a>
Process Management	5. Responsibility	<a href="#">Governance</a>
	6. Rules and procedures	<a href="#">Enterprise Risk Management</a>
		<a href="#">Policies and Management of Regulatory Compliance</a>
		<a href="#">Integrated Management System</a>
	7. Monitoring	<a href="#">Sustainability Business Model</a>
		<a href="#">Performance and Targets</a>
		<a href="#">Governance</a>
		<a href="#">Integrated Management System</a>
	8. Rewarding schemes and motives for sustainable development	<a href="#">Independent Assurance Report</a>
		<a href="#">Governance</a>
9. Stakeholders engagement	<a href="#">Employee Selection, Attracting and Retaining Talented Employees</a>	
	<a href="#">Stakeholder Dialogue</a>	
10 Responsible products and innovation	<a href="#">Additional Information for GRI Indicators / Stakeholders</a>	
	<a href="#">Products and Services for Sustainability</a>	
	<a href="#">Energy and Climate Change</a>	
Environment	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>		
<a href="#">Environmental Performance Data - Waste</a>		
13. Climate relevant emissions	<a href="#">Energy and Climate Change</a>	
	<a href="#">Other Environmental Aspects</a>	
	<a href="#">Environmental Performance Data - Energy</a>	

## The 20 criteria of the Greek Sustainability Code: Actions recorded in 2018 Sustainability Report

Theme	Criteria	Report Location
Society	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 Code of Human Rights and Social Principles</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 Code of Human Rights and Social Principles</a>
	16. Qualifications	<a href="#">Human Resources Management</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 Purchasing and Supply Chain Management</a> <a href="#">OTE Group Code of Human Rights and Social Principles</a>
	18. Corporate citizenship	<a href="#">Group Presentation</a> <a href="#">Performance and Targets</a> <a href="#">Connectivity for All</a> <a href="#">Social Contribution</a>
	19. Initiatives and political influence	<a href="#">Awards and Memberships</a> <a href="#">Policies and Management of Regulatory Compliance</a>
	20. Corruption prevention and fighting	<a href="#">Policies and Management of Regulatory Compliance</a>



## Global Reporting Initiative Content Index

The OTE Group 2018 Sustainability Report is “in accordance” with the GRI Standards at “core” level.

GRI Standards	Disclosure	Section
<b>GRI 101 Foundation 2016</b>		
<b>General Disclosures</b>		
	<b>Organisational Profile</b>	
	102-1 Name of the organisation	<a href="#">Report Profile</a>
	102-2 Activities, brands, products, and services	<a href="#">Group Presentation</a>
	102-3 Location of headquarters	<a href="#">Report Profile</a>
	102-4 Location of operations	<a href="#">Group Presentation</a>
	102-5 Ownership and legal form	<a href="#">Group Presentation</a>
	102-6 Markets served	<a href="#">Group Presentation</a> <a href="#">Performance and Targets</a> <a href="#">Connectivity for All</a>
<b>GRI 102 General Disclosures 2016</b>	102-7 Scale of the organisation	<a href="#">Group Presentation</a> <a href="#">Performance and Targets</a>
	102-8 Information on employees and other workers	<a href="#">Employment</a> <a href="#">Human Resources Performance Data</a>
	102-9 Supply chain	<a href="#">Responsible Purchasing and Supply Chain Management</a>
	102-10 Significant changes to the organization and its supply chain	<a href="#">Report Profile</a>
	102-11 Precautionary Principle or approach	<a href="#">Sustainability Business Model</a> <a href="#">Enterprise Risk Management</a> <a href="#">Policies and Management of Regulatory Compliance</a> <a href="#">Integrated Management System</a> <a href="#">Health and Safety</a> <a href="#">Environmental Strategy</a>
	102-12 External initiatives	<a href="#">Report Profile</a> <a href="#">Awards and Memberships</a> <a href="#">Additional Information for GRI Indicators / Memberships</a>
	102-13 Membership of associations	<a href="#">Policies and Management of Regulatory Compliance</a> <a href="#">Awards and Memberships</a> <a href="#">Additional Information for GRI Indicators / Memberships</a>

GRI Standards	Disclosure	Section
GRI 102 General Disclosures 2016	<b>Strategy</b>	
	102-14 Statement from senior decision-maker	<a href="#">Message from the Chairman and CEO</a>
	<b>Ethics and integrity</b>	
	102-16 Values, principles, standards, and norms of behaviour	<a href="#">Sustainability Business Model</a> <a href="#">Policies and Management of Regulatory Compliance</a> , <a href="#">Integrated Management System</a> <a href="#">Additional Information for GRI Indicators / Integrated Management System</a>
	<b>Governance</b>	
	102-18 Governance structure	<a href="#">Governance</a>
	<b>Stakeholder engagement</b>	
	102-40 List of stakeholder groups	<a href="#">Stakeholder Dialogue</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a>
	102-41 Percentage of employees covered by collective bargaining agreements	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>
	102-42 Identifying and selecting stakeholders	<a href="#">Stakeholder Dialogue</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a>
102-43 Approach to stakeholder engagement	<a href="#">Report Profile</a> <a href="#">Sustainability Business Model</a> <a href="#">Stakeholder Dialogue</a> <a href="#">Customer Service and Satisfaction</a> <a href="#">Employee Communication, Engagement and Satisfaction</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a>	
102-44 Key topics and concerns raised by stakeholders	<a href="#">Additional Information for GRI Indicators / Stakeholders</a>	

GRI Standards	Disclosure	Section
	<b>Reporting practice</b>	
GRI 102 General Disclosures 2016	102-45 Entities included in the consolidated financial statements	<a href="#">Report Profile</a> <a href="#">Group Presentation</a>
	102-46 Process for defining report content	<a href="#">Report Profile</a> <a href="#">Stakeholder Dialogue</a>
	102-47 Material topics	<a href="#">Stakeholder Dialogue</a> <a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>
	102-48 Re-statements of information	<a href="#">Report Profile</a>
	102-49 Significant changes in reporting	<a href="#">Report Profile</a>
	102-50 Reporting period	<a href="#">Report Profile</a>
	102-51 Date of most recent report	The most recent published report covers the period from January 1 to December 31, 2017
	102-52 Reporting cycle	<a href="#">Annual</a>
	102-53 Contact point	<a href="#">Report Profile</a>
	102-54 Claims of reporting in accordance with the GRI Standards	<a href="#">Report Profile</a>
	102-55 GRI content index	<a href="#">Global Reporting Initiative Content Index</a>
	102-56 External assurance policy	<a href="#">Independent Assurance Report</a>

## Topic-Specific Standards

### Material Issue: Economic Performance

GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary	<a href="#">Sustainability Business Model</a>
	103-2 The management approach and its components	<a href="#">Performance and Targets</a>
	103-3 Evaluation of the management approach	<a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>
GRI 201 Economic Performance 2016	201-1 Direct economic value generated and distributed	<a href="#">Performance and Targets</a>
	201-2 Financial implications and other risks and opportunities due to climate change	<a href="#">Products and Services for Sustainability</a> <a href="#">Energy and Climate Change</a>
	201-4 Financial assistance received from government	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.

GRI Standards	Disclosure	Section
<b>Market Presence</b>		
GRI 202 Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>
	202-2 Proportion of senior management hired from the local community	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 79% of Chief Officers and Executive Directors are local citizens.
<b>Indirect Economic Impacts</b>		
GRI 203 Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	<a href="#">Connectivity for All</a> <a href="#">Social Contribution</a> <a href="#">Electromagnetic Fields</a> <a href="#">Other Environmental Aspects</a>
	203-2 Significant indirect economic impacts	<a href="#">Performance and Targets</a> <a href="#">Products and Services for Sustainability</a> <a href="#">Connectivity for All</a> <a href="#">Social Contribution</a> <a href="#">Access to Digital Society</a>
<b>Procurement Practices</b>		
GRI 204 Procurement Practices 2016	204-1 Proportion of spending on local suppliers	<a href="#">Responsible Purchasing and Supply Chain Management</a>
<b>Material Issue: Corporate compliance policies</b>		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary	<a href="#">Policies and Management of Regulatory Compliance</a>
	103-2 The management approach and its components	<a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>
	103-3 Evaluation of the management approach	
GRI 205 Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	<a href="#">Policies and Management of Regulatory Compliance</a>
	205-2 Communication and training about anti-corruption policies and procedures	<a href="#">Policies and Management of Regulatory Compliance</a>
	205-3 Confirmed incidents of corruption and actions taken	<a href="#">Policies and Management of Regulatory Compliance</a>

GRI Standards	Disclosure	Section
<b>Material Issue: Corporate compliance policies</b>		
GRI 419 Socioeconomic Compliance 2016	419-1 Non-compliance with laws and regulations in the social and economic area	<a href="#">Policies and Management of Regulatory Compliance</a>
<b>Anti-competitive Behavior</b>		
GRI 206 Anti-competitive behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	<a href="#">Policies and Management of Regulatory Compliance</a>
<b>Materials</b>		
GRI 301 Materials 2016	301-1 Materials used by weight or volume	<a href="#">Circular Economy</a>
	301-2 Recycled input materials used	<a href="#">Circular Economy</a> 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).
	301-3 Reclaimed products and their packaging materials	<a href="#">Circular Economy</a> 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.

GRI Standards	Disclosure	Section
<b>Energy</b>		
GRI 302 Energy 2016	302-1 Energy consumption within the organization	<a href="#">Energy and Climate Change</a> <a href="#">Environmental Performance Data - Energy</a>
	302-3 Energy intensity	<a href="#">Energy and Climate Change</a>
	302-4 Reduction of energy consumption	<a href="#">Energy and Climate Change</a> <a href="#">Environmental Performance Data - Energy</a>
	302-5 Reductions in energy requirements of products and services	<a href="#">Energy and Climate Change</a>
	<b>Water</b>	
GRI 303 Water 2016	303-1 Water withdrawal by source	<a href="#">Circular Economy</a>
	303-2 Water sources significantly affected by withdrawal of water	<a href="#">Circular Economy</a>
	303-3 Water recycled and reused	<a href="#">Circular Economy</a>
<b>Biodiversity</b>		
GRI 304 Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	<p data-bbox="1301 762 2145 798"><a href="#">Other Environmental Aspects</a></p> <p data-bbox="1301 802 2145 938">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:</p> <ul data-bbox="1301 943 2145 1265" style="list-style-type: none"> <li data-bbox="1301 943 2145 1121">• 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 data-bbox="1301 1126 2145 1265">• 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.</li> </ul>

GRI Standards	Disclosure	Section
<b>Biodiversity</b>		
<b>GRI 304 Biodiversity 2016</b>	304-2 Significant impacts of activities, products, and services on biodiversity	<p>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.</p> <ul style="list-style-type: none"> <li>• The majority of the installations are small, without permanent personnel and with limited transportation activities at the operational stage.</li> </ul>
	304-3 Habitats protected or restored	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	
<b>Emissions</b>		
<b>GRI 305 Emissions 2016</b>	305-1 Direct (Scope 1) GHG emissions	<a href="#">Energy and Climate Change</a> <a href="#">Other Environmental Aspects</a> <a href="#">Environmental Performance Data - Energy</a>
	305-2 Energy indirect (Scope 2) GHG emissions	<a href="#">Energy and Climate Change</a> <a href="#">Environmental Performance Data - Energy</a>
	305-3 Other indirect (Scope 3) GHG emissions	<a href="#">Energy and Climate Change</a>
	305-4 GHG emissions intensity	<a href="#">Energy and Climate Change</a>
	305-5 Reduction of GHG emissions	<a href="#">Energy and Climate Change</a> <a href="#">Environmental Performance Data - Energy</a>
	305-6 Emissions of ozone-depleting substances (ODS)	<a href="#">Other Environmental Aspects</a>
	305-7 Nitrogen oxides (NO <sub>x</sub> ), sulfur oxides (SO <sub>x</sub> ), and other significant air emissions	<a href="#">Additional Information for GRI Indicators / Direct Non-GHG Emissions</a>



GRI Standards	Disclosure	Section
<b>Effluents and Waste</b>		
GRI 306 Effluents and Waste 2016	306-1 Water discharge by quality and destination	<a href="#">Circular Economy</a>
	306-2 Waste by type and disposal method	<a href="#">Circular Economy</a> <a href="#">Environmental Performance Data - Waste</a>
	306-3 Significant spills	<a href="#">Circular Economy</a> There were no significant spills during the management of batteries and lubricants.
	306-4 Transport of hazardous waste	<a href="#">Circular Economy</a>
	306-5 Water bodies affected by water discharges and/or runoff	<a href="#">Circular Economy</a>
<b>Environmental Compliance</b>		
GRI 307 Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	The fines (related to the environment) imposed in 2018 amounted to € 19,152, 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.
<b>Supplier Environmental Assessment</b>		
GRI 308 Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	<a href="#">Responsible Purchasing and Supply Chain Management</a>
	308-2 Negative environmental impacts in the supply chain and actions taken	<a href="#">Responsible Purchasing and Supply Chain Management</a>
<b>Employment</b>		
GRI 401 Employment 2016	401-1 New employee hires and employee turnover	<a href="#">Employment</a> <a href="#">Human Resources Performance Data</a>
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	<a href="#">Additional Information for GRI Indicators / Employee Benefits</a>
	401-3 Parental leave	<a href="#">All employees, female and male, returned to their normal duties</a>

GRI Standards	Disclosure	Section
<b>Labor/Management Relations</b>		
GRI 402 Labor/Management Relations	402-1 Minimum notice periods regarding operational changes	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.
<b>Occupational Health and Safety</b>		
GRI 403 Occupational Health and Safety 2016	403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	<a href="#">Health and Safety</a> <a href="#">Additional Information for GRI Indicators / Health and Safety Performance</a> <a href="#">Human Resources Performance Data</a>
<b>Material Issue: Employee training and skills development</b>		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	<a href="#">Employee Training and Skills Development</a> <a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>
GRI 404 Training and Education 2016	404-1 Average hours of training per year per employee 404-2 Programs for upgrading employee skills and transition assistance programs 404-3 Percentage of employees receiving regular performance and career development reviews	<a href="#">Employee Training and Skills Development</a> <a href="#">Human Resources Performance Data</a> <a href="#">Employee Selection, Attracting and Retaining Talented Employees</a> <a href="#">Employee Training and Skills Development</a> <a href="#">Employee Selection, Attracting and Retaining Talented Employees</a>
<b>Diversity and Equal Opportunity</b>		
GRI 405 Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	<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 Code of Human Rights and Social Principles</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

<b>GRI Standards</b>	<b>Disclosure</b>	<b>Section</b>
<b>Equal Remuneration for Women and Men</b>		
GRI 405 Diversity and Equal Opportunity 2016	405-2 Ratio of basic salary and remuneration of women to men	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>
<b>Non-discrimination</b>		
GRI 406 Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	<a href="#">Human Rights Management</a>
<b>Freedom of Association and Collective Bargaining</b>		
GRI 407 Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	<a href="#">Human Rights Management</a> <a href="#">Fair Employment Policy Framework and Equal Opportunities</a> <a href="#">Responsible Purchasing and Supply Chain Management</a> <a href="#">OTE Group Code of Human Rights and Social Principles</a> <a href="#">OTE Group Policy on Employee Relations</a>
<b>Child Labor</b>		
GRI 408 Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	<a href="#">Human Rights Management</a> <a href="#">Responsible Purchasing and Supply Chain Management</a> <a href="#">OTE Group Code of Human Rights and Social Principles</a> <a href="#">OTE Group Policy on Employee Relations</a>
<b>Forced or Compulsory Labor</b>		
GRI 409 Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	<a href="#">Human Rights Management</a> <a href="#">Responsible Purchasing and Supply Chain Management</a> <a href="#">OTE Group Code of Human Rights &amp; Social Principles</a>
<b>Investment</b>		
GRI 412 Human Rights Assessments 2016	412-1 Operations that have been subject to human rights reviews or impact assessments 412-2 Employee training on human rights policies or procedures 412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	<a href="#">Human Rights Management</a>  <a href="#">Human Rights Management</a> <a href="#">Human Rights Management</a>

GRI Standards	Disclosure	Section
<b>Local Communities</b>		
GRI 413 Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	<a href="#">Social Contribution</a>
	413-2 Operations with significant actual and potential negative impacts on local communities	<a href="#">Social Contribution</a> <a href="#">Electromagnetic Fields</a> <a href="#">Other Environmental Aspects</a> Environmental protection expenditures for 2018 amounted to € 1.6 million and cover waste treatment, management and disposal, environmental impact assessment studies, external certification of environmental management systems and measurements on electromagnetic fields.
<b>Supplier Social Assessment</b>		
GRI 414 Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	<a href="#">Responsible Purchasing and Supply Chain Management</a>
	414-2 Negative social impacts in the supply chain and actions taken	<a href="#">Responsible Purchasing and Supply Chain Management</a>
<b>Public Policy</b>		
GRI 415 Public Policy	415-1 Political contributions	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.
<b>Customer Health and Safety</b>		
GRI 416 Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	<a href="#">Communication with Customers</a> <a href="#">Electromagnetic Fields</a>
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	<a href="#">Communication with Customers</a> <a href="#">Electromagnetic Fields</a>

GRI Standards	Disclosure	Section
<b>Marketing Communications</b>		
GRI 417 Marketing and Labelling 2016	417-1 Requirements for product and service information and labelling	<a href="#">Communication with Customers</a>
	417-2 Incidents of non-compliance concerning product and service information and labelling	<a href="#">Communication with Customers</a>
	417-3 Incidents of non-compliance concerning marketing communications	<a href="#">Communication with Customers</a>
<b>Material Issue: Data Security and Privacy</b>		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary	<a href="#">Security and Data Privacy</a>
	103-2 The management approach and its components	<a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>
	103-3 Evaluation of the management approach	
GRI 418 Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	<a href="#">Security and Data Privacy</a>
<b>Material Issue: Customer Service and Satisfaction</b>		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary	<a href="#">Customer Service and Satisfaction</a>
	103-2 The management approach and its components	<a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>
	103-3 Evaluation of the management approach	
	Results of surveys measuring customer satisfaction	<a href="#">Customer Service and Satisfaction</a>
<b>Material Issue: Safe and Responsible Use of Technology</b>		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary	<a href="#">Policies and Management of Regulatory Compliance</a>
	103-2 The management approach and its components	<a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>
	103-3 Evaluation of the management approach	
<b>Material Issue: Business Resilience</b>		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary	<a href="#">Business Continuity</a>
	103-2 The management approach and its components	<a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>
	103-3 Evaluation of the management approach	

## Additional Information for GRI Indicators

### Memberships

Organization / Initiative	Company	Participation Type
<b>Greece</b>		
Hellenic Network for Corporate Social Responsibility	<a href="#">OTE Group</a>	Member since 2001.
Hellenic branch of UN Global Compact (UNGC)	<a href="#">OTE / COSMOTE</a>	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	<a href="#">OTE Globe</a>	Member since 2014.
The Sustainable Greece 2020 Initiative	<a href="#">OTE Group</a>	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	<a href="#">OTE</a>	Member since 2008.
Global Sustain	<a href="#">OTE Group</a>	Member since 2007.
Road Safety Institute "Panos Mylonas" and Roads to the Future" Alliance for safety and courtesy on the road	<a href="#">COSMOTE</a>	Member and sponsor since 2009.
Code of Conduct for value-add-ed services provided through mobile phones and for the protection of juvenile users	<a href="#">COSMOTE</a>	Participant since 2006. In 2008, the Code was adjusted to European Standards.
Association of Mobile Telephony Companies (EEKT)	<a href="#">COSMOTE</a>	Founding member since 2008
Transparency International Romania	<a href="#">Telekom Romania Mobile Communications</a>	Partner since 2010.
United Nations Global Compact - Global Compact Network Romania	<a href="#">Telekom Romania Mobile Communications</a>	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.
<b>Europe</b>		
European Telecommunications Network Operators' Association (ETNO)	<a href="#">OTE</a> <a href="#">Telekom Romania Communications</a>	Founding member of ETNO since 1992 and member of Sustainability Working Group since 2007. OTE signed the Sustainability Charter in 2011. Member.
European Telecommunications Standards Institute (ETSI)	<a href="#">COSMOTE</a>	Member since 1998.
ICT Coalition for the Safer Use of Connected Devices And Online Services by Children and Young People in the EU	<a href="#">OTE</a> <a href="#">COSMOTE</a> <a href="#">Telekom Romania Communications</a> <a href="#">Telekom Romania Mobile Communications</a>	Participation, since 2013, as members of Deutsche Telekom Group

Organization / Initiative	Company	Participation Type
<b>Europe</b>		
European Memorandum for Safer Mobile Use by children and younger teenagers	<u>COSMOTE</u>	Participant since 2007
<b>Internationally</b>		
GeSI (Global e-Sustainability Initiative)	<u>OTE</u>	Participation, as member of Deutsche Telekom Group.
GSM Association (GSM)	<u>COSMOTE</u>	Member of the World Association of Mobile Communications Services since 1997. COSMOTE actively participates in many of its workgroups.
	<u>Telekom Romania Mobile Communications</u>	Full member.
International Telecommunication Union (ITU)	<u>OTE</u> <u>Telekom Romania</u>	Associated member (OTE has been following ITU activities since the beginning of 1990). Partner since 2015.
CFSI (Conflict-Free Sourcing Initiative)	<u>OTE</u>	Participation since, as member of Deutsche Telecom Group.



## Materiality Analysis

(Relevant for GRI Standards 102-47, 103-1)

### Most important issues for management and stakeholders Demarcation (inside / outside companies)

1	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	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	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	The issue is primarily internal, has an impact on the operation of the companies and their employees
18	Customer service and satisfaction	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	Light Green	White	White	Dark Green	Medium Green	White	White	White	Light Green	Dark Green	White
Customers and prospective customers	White	White	Medium Green	Dark Green	White	White	White	White	Medium Green	Dark Green	Light Green
Employees, prospective employees and their representatives	White	White	Medium Green	Dark Green	White	Medium Green	Light Green	White	White	Dark Green	White
Business	White	Light Green	White	Dark Green	Light Green	White	White	White	Medium Green	Dark Green	White
Science, research and education organizations	Light Green	White	Medium Green	Dark Green	White	White	White	White	Medium Green	Dark Green	White
Non Profit Organizations / NGOs	Yellow	White	Dark Green	Dark Green	White	Light Green	White	White	White	Light Green	White
Media	White	Light Green	White	Dark Green	White	White	White	Light Green	Medium Green	Dark Green	White
State / Government entities	White	White	White	Dark Green	Yellow	White	White	Dark Green	Light Green	Yellow	White
Suppliers	Medium Green	White	Light Green	Dark Green	Light Green	White	White	White	White	Medium Green	White

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 Standards 102-40, 102-42, 102-43, 102-44)

## Stakeholders OTE and COSMOTE

### Customers and prospective customers

Youngsters and young adults  
Families  
Middle-aged people  
Senior citizens  
Small and medium-sized enterprises  
Large corporations  
Telecommunications Service Providers  
Public authorities  
Consumer organizations and interest groups

### NGOs and interest groups

Humanitarian organizations and charities  
Business ethics groups  
Foundations  
Environmental protection organizations  
Business non-governmental organizations  
CR related organizations

### Employees, prospective employees and their representatives

Employees  
Board of Directors  
Management Board  
Management Team  
Unions and work councils  
Applicants and prospective employees  
Scholars and trainees / interns  
Universities / students

### Business

ATHEX-listed companies  
Other large corporations  
Small and medium-sized enterprises  
Trade and industry associations  
Co-operation partners, subsidiaries  
Competitors

### Media

Daily and weekly newspapers  
Newswires and press agencies  
TV and radio  
Internet, news sites and other interest  
Social media and blogs  
Journalist associations / media groups  
Ownership and media commercial executives

### Suppliers

First-tier suppliers  
Sub-suppliers  
Auditors and certification bodies  
Consultants

### Science, research and education

CR and sustainability research institutions  
Public Policy and business research institutions  
Universities  
Schools  
Student organizations and university associations  
Technology and Innovation Research Institutions  
ICT SMEs

### State / Government entities

State institutions  
Embassies and consulates  
Supervisory and regulatory authorities  
Communities, local authorities and their representatives  
International organizations  
EU level entities

### Analysts and investors

Shareholders  
Bondholders  
Financial institutions  
Private investors  
Funds, asset managers and analysts  
Rating agencies  
Analyst organizations and associations  
Institutional investors

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE Group's Responsiveness
Customers and prospective customers	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>	<u>Customers</u> <u>Society</u> <u>Electromagnetic Fields</u>
	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			
Business	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>Customers</u> <u>Employees</u>
	Economic Results Releases	Quarterly		
	Roadshows	Ongoing		
	Meetings	Ongoing		
	Conference calls	Ongoing		
	Annual reports	Annual		
	Presentations	Ongoing		
	Trainings	Ongoing		
	Sustainability Report	Annual		
Science, research and education	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>Products and Services for Sustainability</u> <u>Safe and Responsible Use of Technology</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 Group's Responsiveness
NGOs and interest groups	Meetings	Frequently	- Importance of adopting CR	<a href="#">Sustainability Report</a> (all sections)
	CR surveys	Annual	- Internet Safety public education	
	Conferences	Ongoing	- Support for vulnerable groups and charities	
	E-mails	Ongoing	- Social Contribution	
	Working groups	Ongoing	- EMF, Biodiversity	
	Consultation	Ongoing	- Environmental performance	
	Sustainability Report	Annual		
Media	Announcements / Press releases	Ongoing	- Management	<a href="#">Sustainability Report</a> (all sections)
	Informational material	Ongoing	- HR issues	
	Events / Press conferences	Ongoing	- Industry developments and market structure	
	Other media contacts	Ongoing	- Technology advances/network infrastructure	
	CR surveys	Annual	- New product launches	
	Sustainability Report	Annual	- TV market	
			- Technology and telecommunications	
			- Business and finance policies	
			- Culture	
			- Sustainability	
State / Government entities	Consultations on proposed laws and regulatory frameworks for telecommunication markets	Ongoing	- Implementation of regulatory measures applying to OTE	<a href="#">OTE Group Policies and Management of Regulatory Compliance</a> <a href="#">Connectivity for All</a> <a href="#">Communication with Customers</a> <a href="#">Social Contribution</a> <a href="#">Climate and Environment</a>
	Written or verbal communication with regulatory and public sector bodies	Ongoing	- Issues of effective regulatory adjustment	
	Dialogue with representatives of national and local authorities	Ongoing	- Specialized national goals for European Digital Agenda Strategy	
	CR surveys	Annual	- Transparency	
	Attendance in associations and unions	Ongoing	- Governance	
	Systematic liaison with local authorities (mostly regional)	Ongoing	- Economic growth	
	Sustainability Report	Annual	- Energy and environment	
			- Infrastructure construction and maintenance	
			- Social security	

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE Group's Responsiveness
<b>Employees, prospective employees and their representatives</b>	OTE Group companies' Intranets	Ongoing	- Labor cost rationalization and alignment	<a href="#">Sustainability Business Model</a> <a href="#">Human Rights Management</a> <a href="#">Security and Data Privacy</a> <a href="#">Employees</a> <a href="#">Employee Volunteering</a>
	Decisions on all important Company issues	Ongoing	- Organizational effectiveness	
	Meetings with employees	Ongoing	- Collective Bargaining Agreements	
	Negotiations with unions and work councils	Periodic	- Fair employment policy (diversity, worklife balance, nondiscrimination, equal opportunities)	
	Emails from the CEO-Chairman and General Directors	Periodic	- Health and safety	
	Employee satisfaction surveys	Biennial	- Employee development	
	Employee surveys results roll out and follow up process	Periodic	- Leadership	
	CR surveys	Annual	- Training	
	Events	Periodic	- Performance management	
	Performance appraisal system	Annual	- Recruitment	
	Trainings	Ongoing	- Talent management	
	Feedback tools	Ongoing	- Engagement and satisfaction	
	Other surveys	Ongoing	- Employees benefits	
	Workshops / labs	Annual	- Corporate volunteerism	
	Formal company policies / processes	Periodic	- Strategy and all corporate information dissemination	
Newsletter (electronic)	Ongoing	- Compliance issues		
Internal Communication Campaigns	Bi-weekly	- Security matters		
Sustainability Report	Ongoing			
	Annual			
<b>Suppliers</b>	Consultation and dialogue on procurement policy / supplier code of conduct issues	Ongoing	- Tender criteria and competitions	<a href="#">OTE Group</a> <a href="#">Responsible Purchasing and Supply Chain Management</a>
	Attendance in sector-based unions	Ongoing	- Communication on supplies issues	
	Meetings	Ongoing	- Transparency	
	CR surveys	Ongoing	- Market Policy	
	Suppliers' evaluation	Annual	- Economic growth	
	Negotiations	Ongoing	- Inserting CR criteria, including environmental criteria	
	Presentation of new products	Ongoing	- Procurement best practices	
	Consultation and dialogue on technical issues	Ongoing	- Procurement trends	
	Sustainability Report	Periodic		
	Annual			

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE Goup's Responsiveness
Analysts and investors	Investor Relations Department communication	Ongoing	- Financial performance	Sustainability Report (all sections)
	Annual General Shareholders Meeting	Annual	- Short and longer term outlook	
	Annual, Corporate governance report and Sustainability Reports	Annual	- Competitive environment	
	CR surveys	Annual	- Cashflow	
	Participation in SRI/ESG' ratings	Ongoing	- Debt issuance and repayment	
	Private meetings	Ongoing	- Dividends	
	Conference Calls	Quarterly	- Group strategy and results	
	Meetings of executives	Ongoing	- Outlook on labor relations, regulatory decisions, economic conditions	
	Adoption and implementation of policies and principles	Ongoing	- Climate change policy	
	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 Standard 102-16)

Integrated Management System Certifications	OTE Group					
	OTE	COSMOTE	COSMOTE e- Value	OTE Academy	Telekom Romania Communications	Telekom Romania Mobile Communications
• Integrated Management System, as per PAS99	○	○				
• Quality Management, as per ISO 9001	○	○	○	○	○	○
• Environmental Management, as per ISO 14001	○	○			○	○
• Occupational Health & Safety, as per OHSAS 18001	○	○			○	○
• Information Security, as per ISO 27001	○	○	○		○	○
• IT Service Management, as per ISO 20000-1		○			○	○
• 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)	○	○				
• Principles and Guidelines for Good Distribution Practice of Medical Devices, acc. to Decision 1348/04 of the Greek Ministry for Health and Welfare	○	○				
• Regulation of Industrial Safety "Government Gazette B 336 - 16.03.2005"		○				

## Employee Benefits

### (Relevant for GRI Standard 401-2)

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 2018

##### 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

##### Free time - Vacation

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

## Main Benefits to OTE Group employees per category in 2018

### 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

### Employee support and counseling

- Psychological support consulting services through a 24/7 anonymous and confidential helpline called NEXT TO YOU, to empower and support employees and their families, in every aspect of their everyday life, while contributing to maintaining their wellness at high levels

## Health and Safety Performance

(Relevant for GRI Standard 403-2)

### 2018 Health and Safety Performance

	OTE	COSMOTE	OTE Group
<b>Fatalities</b>			
Employee Fatalities	None	None	None
Contractor Fatalities	N/A	N/A	N/A
<b>Work Related Accidents (employees)</b>			
Number of Employees Injured	<b>69</b>	<b>14</b>	<b>103</b>
Men	59	1	70
Women	10	13	33
Injury Rate <sup>1</sup>	<b>0.90</b>	<b>0.70</b>	<b>0.57</b>
Men	1.08	0.10	0.64
Women	0.45	1.30	0.46
Occupational Disease Rate <sup>2</sup>	<b>0</b>	<b>0</b>	<b>0</b>
Men	0	0	0
Women	0	0	0
Lost Day Rate <sup>3</sup>	<b>30.69</b>	<b>16.65</b>	<b>18.84</b>
Men	35.25	13.74	23.31
Women	19.51	19.56	12.05
Absentee Rate <sup>4</sup>	<b>643.92</b>	<b>777.96</b>	<b>639.16</b>

Notes: <sup>1</sup> 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

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> 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 Standard 305)

### 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

### Visual Impact

Telecommunications companies have relatively small visual impact on the environment.

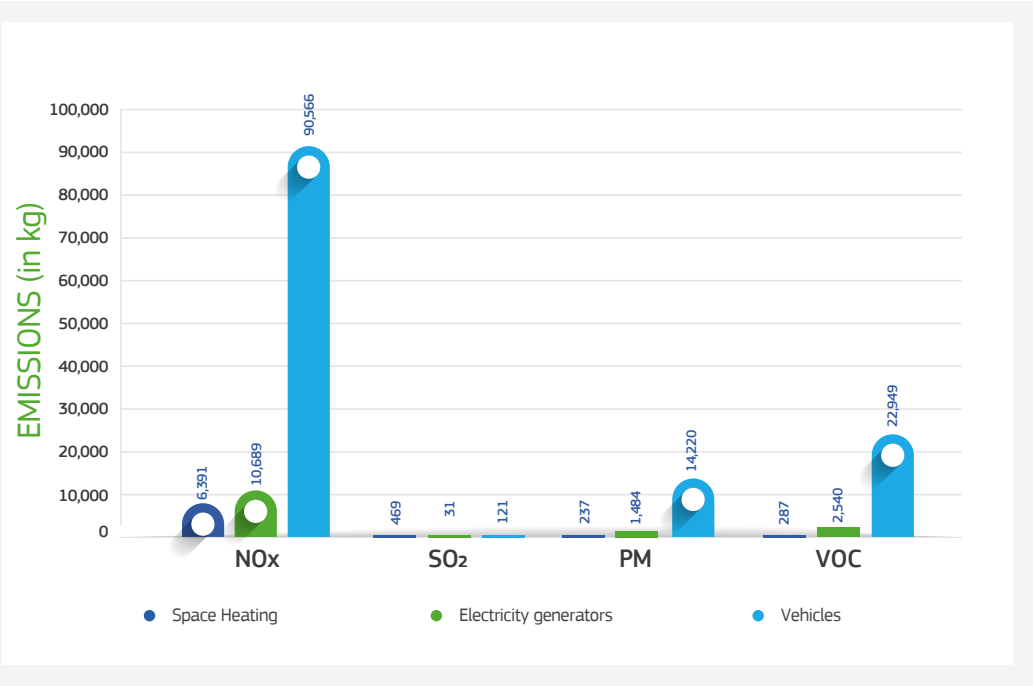
However, to minimize whatever impact may exist:

- 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 (2 collocation cases in Greece; 28 collocation cases in Romania).
- 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 (165 special constructions in Greece).
- Appropriate modifications are also applied to existing telecommunication infrastructure (3 special constructions in Greece).

# Direct Non-GHG Emissions

(Relevant for GRI Standard 305-7)

- Emissions of typical air pollutants (NOx, 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.



## Human Resources Performance Data

Performance Indicators on Human Resources	GREECE		ROMANIA		OTE GROUP	
<b>Total workforce (headcount on 31st of December)</b>	<b>12,419</b>		<b>6,211</b>		<b>18,630</b>	
<b>Employment type</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Full - time dependent employment with indeterminate term contracts	11,781	94.9 %	5,810	93,5%	17,591	94.4%
Part- time dependent employment with indeterminate term contracts	564	4.5 %	10	0,2%	574	3.1%
Dependent employment, on fixed-term	74	0.6%	391	6,3%	465	2.5%
<b>Gender</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Male	7,635	61%	3,528	57%	11,163	60%
Female	4,784	39%	2,683	43%	7,467	40%
<b>Age</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Under 30 years	588	5%	1,153	19%	1,741	9%
Between 31 and 50 years	9,456	76%	3,916	63%	13,372	72%
Over 51 years	2,375	19%	1,142	18%	3,517	19%
<b>Responsibility level</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
<b>Employees with position of responsibility<sup>1</sup></b>	<b>1,633</b>	<b>13%</b>	<b>461</b>	<b>7%</b>	<b>2,094</b>	<b>11%</b>
Male	1,150		302		1,452	
Female	483		159		642	
<b>Employees without position of responsibility</b>	<b>10,786</b>	<b>87%</b>	<b>5,750</b>	<b>93%</b>	<b>16,536</b>	<b>89%</b>
Male	6,485		3,226		9,711	
Female	4,301		2,524		6,825	
<b>Type of Work</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Office	7,036	57%	2,928	47%	9,964	53%
Retail	1,203	10%	1,031	17%	2,234	12%
Fieldwork/other	4,180	34%	2,252	36%	6,432	35%
<b>Employees with special needs</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Employees with special needs	305	2%	0	0%	305	2%
<b>Headcount (Yearly) Average</b>	<b>12,606</b>		<b>6,372</b>		<b>18,978</b>	
Male	7,766	62%	3,629	57%	11,395	60%
Female	4,840	38%	2,743	43%	7,583	40%

Performance Indicators on Human Resources	GREECE		ROMANIA		OTE GROUP	
<b>Total workforce on indeterminant term contracts</b>	<b>12,345</b>		<b>5,820</b>		<b>18,165</b>	
<b>Employment type</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Full- time	11,781	95%	5,810	100%	17,591	97%
Part- time	564	5%	10	0%	574	3%
<b>Gender</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Male	7,600	62%	3,343	57%	10,943	60%
Female	4,745	38%	2,477	43%	7,222	40%
<b>Responsibility level</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
<b>Employees with position of responsibility<sup>1</sup></b>	<b>1,630</b>	<b>13%</b>	<b>450</b>	<b>8%</b>	<b>2,080</b>	<b>11%</b>
Male	1,147	70%	292	65%	1,439	69%
Female	483	30%	158	35%	641	31%
<b>Employess without position of responsibility</b>	<b>10,715</b>	<b>87%</b>	<b>5,370</b>	<b>92%</b>	<b>16,085</b>	<b>89%</b>
Male	6,453	60%	3,051	57%	9,504	59%
Female	4,262	40%	2,319	43%	6,581	41%
<b>Type of Work</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Office	7,013	57%	2,750	47%	9,763	54%
Retail	1,198	10%	840	14%	2,038	11%
Fieldwork/other	4,134	33%	2,230	38%	6,364	35%
<b>Total workforce on full-time indeterminant term contracts</b>	<b>11,781</b>		<b>5,810</b>		<b>17,591</b>	
<b>Gender</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Male	7,477	63%	3,342	58%	10,819	62%
Female	4,304	37%	2,468	42%	6,772	38%
<b>Total workforce on part-time indeterminant term contracts</b>	<b>564</b>		<b>10</b>		<b>574</b>	
<b>Gender</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Male	123	22%	1	10%	124	22%
Female	441	78%	9	90%	450	78%



Performance Indicators on Human Resources	GREECE		ROMANIA		OTE GROUP	
<b>Total workforce on fixed term contracts</b>	<b>74</b>		<b>391</b>		<b>465</b>	
<b>Gender</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Male	35	47%	185	47%	220	47%
Female	39	53%	206	53%	245	53%
<b>Recruitment</b>	<b>175</b>		<b>792</b>		<b>967</b>	
<b>Gender</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Male	110	63%	398	50%	508	53%
Female	65	37%	394	50%	459	47%
<b>Age</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Under 30 years	70	40%	491	62%	561	58%
Between 31 and 50 years	104	59%	290	37%	394	41%
Over 51 years	1	1%	11	1%	12	1%
<b>Recruitment within OTE Group</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Recruitment within OTE Group	10	6%	131	17%	141	15%
<b>Departures</b>	<b>505</b>	<b>4%</b>	<b>954</b>	<b>16%</b>	<b>1,459</b>	<b>8%</b>
<b>Gender</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Male	340	67%	505	53%	845	58%
Female	165	33%	449	47%	614	42%
<b>Age</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Under 30 years	46	9%	473	50%	519	36%
Between 31 and 50 years	239	47%	429	45%	668	46%
Over 51 years	220	44%	52	5%	272	19%
<b>Voluntary Exit Programs</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Departures in the context of voluntary exit programs	282	56%	743	78%	1,025	70%
<b>Employees covered by collective labor agreements (%)</b>	<b>10,115</b>	<b>81%</b>	<b>6,211</b>	<b>100%</b>	<b>16,326</b>	<b>88%</b>

Performance Indicators on Human Resources	GREECE		ROMANIA		OTE GROUP	
<b>Members of the Board of Directors</b>	<b>10</b>			<b>100%</b>	<b>10</b>	
<b>Gender</b>	<b>Number</b>	<b>%</b>			<b>Number</b>	<b>%</b>
Male	8	80%			8	80%
Female	2	20%			2	20%
<b>Age</b>	<b>Number</b>	<b>%</b>			<b>Number</b>	<b>%</b>
Under 30 years	0	0%			0	0%
Between 31 and 50 years	5	50%			5	50%
Over 51 years	5	50%			5	50%
<b>Members of OTE Group Management Team</b>	<b>15</b>				<b>15</b>	<b>%</b>
<b>Gender</b>	<b>Number</b>	<b>%</b>			<b>Number</b>	<b>%</b>
Male	12	80%			12	80%
Female	3	20%			3	20%
<b>Age</b>	<b>Number</b>	<b>%</b>			<b>Number</b>	<b>%</b>
Under 30 years	0	0%			0	0%
Between 31 and 50 years	7	47%			7	47%
Over 51 years	8	53%			8	53%
<b>Health and Safety Issues</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
<b>Fatalities (number of employees)</b>	<b>0</b>		<b>0</b>		<b>0</b>	
<b>Number of employees injured</b>	<b>93</b>		<b>10</b>		<b>103</b>	
Male	64	69%	6	60%	70	68%
Female	29	31%	4	40%	33	32%
<b>Injury rate<sup>2</sup></b>	<b>0.79</b>		<b>0.16</b>		<b>0.57</b>	
Male	0.88		0.17		0.64	
Female	0.65		0.15		0.46	
<b>Occupational disease rate<sup>3</sup></b>	<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	
Male	0.00		0.00		0.00	
Female	0.00		0.00		0.00	

Performance Indicators on Human Resources	GREECE		ROMANIA		OTE GROUP	
<b>Lost day rate<sup>4</sup></b>	<b>24.17</b>		<b>8.99</b>		<b>18.84</b>	
Male	28.82		12.20		23.31	
Female	16.55		4.73		12.05	
<b>Absentee rate<sup>5</sup></b>	<b>767.93</b>		<b>381.33</b>		<b>639.16</b>	
<b>Hours of psychological support consulting services</b>	<b>1,921</b>		<b>0</b>		<b>1,921</b>	
<b>Training on Health and Safety issues (total hours)</b>	<b>22,887</b>		<b>60,372</b>		<b>83,259</b>	
<b>Training on Health and Safety issues (hours per employee on the basis of headcount average)</b>	<b>1.82</b>		<b>9.47</b>		<b>4.39</b>	
<b>Employee training</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
<b>Total participations</b>	9,314		17,378		26,692	
<b>Gender</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Male	6,050	65%	9,146	53%	15,196	57%
Female	3,264	35%	8,232	47%	11,496	43%
<b>Responsibility level</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Employees with position of responsibility <sup>1</sup>	2,533	27%	789	5%	3,322	12%
Employees without position of responsibility	6,781	73%	16,589	95%	23,370	88%
<b>Type of Work</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Office	6,231	67%	2,237	13%	8,468	32%
Retail	62	1%	5,318	31%	5,380	20%
Fieldwork/other	3,021	32%	9,823	57%	12,844	48%
<b>Total employees who participated in training</b>	<b>5,869</b>	<b>47%</b>	<b>6,275</b>	<b>98%</b>	<b>12,144</b>	<b>64%</b>
<b>Gender</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Male	4,068	69%	3,564	57%	7,632	63%
Female	1,801	31%	2,711	43%	4,512	37%
<b>Total training hours</b>	<b>127,086</b>		<b>142,745</b>		<b>269,831</b>	
<b>Gender (hours)</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Male	88,267	69%	102,236	72%	190,503	71%
Female	38,819	31%	40,509	28%	79,328	29%

Performance Indicators on Human Resources						
	GREECE		ROMANIA		OTE GROUP	
Type of work (hours)	Number	%	Number	%	Number	%
Office	84,925	67%	4,541	3%	89,466	33%
Retail	1,475	1%	40,165	28%	41,640	15%
Fieldwork/other	40,686	32%	98,039	69%	138,725	51%
<b>Training hours average (on the basis of headcount average)</b>	<b>10.08</b>		<b>22.40</b>		<b>14.22</b>	
Training per employee by gender (on the basis of headcount average)	Number	%	Number	%	Number	%
Male	11.37		28.17		16.72	
Female	8.02		14.77		10.46	
Training per employee by type of work of (on the basis of headcount on 31st December)	Number	%	Number	%	Number	%
Office	12.07		1.55		14	
Retail	1.23		38.96		40	
Fieldwork/other	9.73		43.53		53	
<b>Other data</b>						
Internships	Number	%	Number	%	Number	%
University and technical school students who carried out their internship at OTE Group	578		44		622	
Parental leave	Number	%	Number	%	Number	%
Employees who made use of parental leave for childcare	<b>562</b>		<b>167</b>		<b>729</b>	
Male	282		19		301	
Female	280		148		428	
Employees who made use of parental leave without pay	<b>52</b>		<b>5</b>		<b>57</b>	
Male	4		1		5	
Female	48		4		52	
Employees who made use of parental leave for child upbringing at 1/3 pay	<b>3</b>		<b>0</b>		<b>3</b>	
Male	0		0		0	
Female	3		0		3	

Performance Indicators on Human Resources	GREECE		ROMANIA		OTE GROUP	
<b>Employees who returned to work after the use of parental leave</b>	<b>286</b>		<b>159</b>		<b>445</b>	
Male	78		17		95	
Female	208		142		350	

<sup>1</sup> Management position: e.g. Chief Officers, Executive Directors, Heads of Divisions, Heads of Departments, Heads of Sections etc.

<sup>3</sup> Occupational diseases rate = (Total number of occupational diseases cases / Total number of hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees.

<sup>4</sup> 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 of 40 hours per 100 employees. Lost day count begins on the day of the injury or the next day, depending on the time of the day.

<sup>5</sup> 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 of 5 days per 100 employees. This rate is not monitored per gender.

## OTE Group Environmental Performance Data Waste

Category	Materials / Waste streams [1]	GREECE			ROMANIA			OTE GROUP		
		2016	2017	2018	2016	2017	2018	2016	2017	2018
<b>Materials / Resources consumption</b>										
	Water (m³)	162,654	216,773	223,986	105,296	83,468	73,661	267,950	300,241	297,647
	Paper	249,150	241,655	178,558	126,265	150,486	158,513	375,415	392,141	337,071
	Packaging materials	222,423	247,878	750,733	338,546	216,595	47,353	560,969	464,473	798,086
<b>Hazardous</b>										
	<b>Technical - Hazardous</b>									
	Lead batteries	391,783	640,685	574,088	47,949	94,577	117,230	439,732	735,262	691,318
	Various [2]	140,380	274,895	411,135	203,314	117,880	70,600	343,694	392,775	481,735
	<b>Non technical - Hazardous</b>									
	Lubricants	11,580	5,477	6,965	365	1,199	195	11,944	6,676	7,160
	Refrigerants and various chemicals	908	324	2,150	Not Available			908	324	2,150
<b>Technical</b>										
	<b>Telecom network</b>									
	Metals	623,376	1,245,372	1,369,307	152,508	133,641	97,202	775,884	1,379,013	1,466,509
	Cables	3,217,130	528,202	542,171	755,393	556,859	843,014	3,972,523	1,085,061	1,385,185
	WEEE [3]	87,496	190,678	154,346	1,266,044	315,421	513,092	1,353,540	506,099	667,439
	<b>Shops</b>									
	Phones and accessories	23,971	20,652	42,653	80	32	611	24,051	20,684	43,264
	Home batteries	36,345	30,034	26,427	30	69	0	36,375	30,103	26,427
	Obsolete merchandise [4]	0	0	47,793	Not Applicable			10,952	0	58,745
<b>Paper</b>										
	Solid waste disposal sites	333,378	332,822	151,713	42,377	63,847	146,256	375,754	396,669	297,969
	Recycling	103,605	82,231	178,892	89,150	86,639	12,257	192,755	168,870	191,149

Category	Materials / Waste streams [1]	GREECE			ROMANIA			OTE GROUP		
		2016	2017	2018	2016	2017	2018	2016	2017	2018
<b>Residual</b>		669,037	679,365	1,203,595	2,032,638	1,868,415	1,453,264	2,701,675	2,547,780	2,656,859
	<b>Packaging materials</b>									
	Offices	5,472	6,111	7,718	18,224	38,707	2,619	23,695	44,818	10,337
	Warehouses	207,210	239,825	316,460	65,140	86,942	89,704	272,350	326,767	406,164
	<b>Municipal Solid Waste [5]</b>									
	Offices	222,252	221,882	219,884	1,948,722	1,742,101	1,360,046	2,170,974	1,963,983	1,579,930
	Warehouses	229,431	207,285	655,333				229,431	207,285	655,333
	<b>Ink-cartridges</b>									
	Offices [6]	3,614	3,361	2,827	552	665	895	4,166	4,026	3,722
	Customers (take-back)	1,059	902	1,373		Not Applicable		1,059	902	1,373
<b>Other</b>		624,686	493,580	16,893	2,892	699	0	627,578	494,278	16,893
	End of life vehicles	624,465	476,935	1,090		Not Applicable		624,465	476,935	1,090
	Tires and other waste	221	16,645	15,803	2,892	699	0	3,113	17,343	15,803

[1] All quantities in kg, unless otherwise stated. Quantities forwarded to solid waste disposal sites are estimates.

[2] Telephone poles, products out of specification, packaging with hazardous substances that are not produced on a permanent basis.

[3] Quantities of waste fluorescent lamps and electrical appliances are included.

[4] Quantities included are not restricted to shops.

[5] Quantity of paper disposed is not included.

[6] Quantities from warehouses are included.

## OTE Group Environmental Performance Data Energy

			GREECE [1]			ROMANIA			OTE GROUP		
		Units	2016	2017	2018	2016	2017	2018	2016	2017	2018
<b>Energy consumption [2]</b>		GWh	509.15	532.50	556.55	280.86	271.05	262.31	790.01	803.56	818.87
	<b>Electricity</b>										
	Telecom network	GWh	377.89	395.18	419.92	177.02	172.34	173.49	554.92	567.51	593.41
	Buildings [3]	GWh	67.26	70.06	69.64	33.63	31.56	29.85	100.89	101.61	99.49
	<b>Stationary installations</b>										
	Heating oil	GWh	3.00	3.57	2.56	0.00	0.00	0.00	3.00	3.57	2.56
	Natural gas	GWh	5.72	7.08	5.51	17.37	20.81	16.20	23.09	27.89	21.70
	District heating	GWh	0.34	0.42	0.34	11.91	7.38	7.75	12.26	7.80	8.09
	Liquid fuels for electricity generators [4]	GWh	14.01	15.70	17.82	0.77	0.75	0.66	14.78	16.45	18.48
	<b>Road transportation</b>										
	Unleaded gasoline	GWh	18.13	14.84	12.78	3.41	1.39	0.21	21.54	16.24	12.99
	Diesel	GWh	22.79	25.66	27.98	36.75	36.82	34.16	59.54	62.48	62.15
<b>GHG emissions [5]</b>		t CO <sub>2</sub> eq	325,911	301,879	284,914	87,324	89,697	83,147	413,236	391,576	368,061
	<b>Direct emissions</b>										
	Space heating [6]	t CO <sub>2</sub> eq	1,964	2,391	1,802	3,455	4,215	3,280	5,419	6,607	5,083
	Electricity generators [6]	t CO <sub>2</sub> eq	3,760	4,213	4,782	206	201	175	3,966	4,413	4,957
	Vehicles [6]	t CO <sub>2</sub> eq	10,269	10,205	10,274	10,012	9,786	8,813	20,281	19,991	19,087
	HFCs - AC systems [7]	t CO <sub>2</sub> eq	10,430	12,245	12,412	5,016	4,214	3,710	15,446	16,459	16,122
	<b>Indirect (scope 2) emissions [8]</b>										
	Telecom network	t CO <sub>2</sub> eq	254,174	231,664	219,214	56,943	58,884	55,863	311,117	290,548	275,078
	Buildings	t CO <sub>2</sub> eq	45,315	41,162	36,429	11,692	12,396	11,306	57,007	53,558	47,735



			GREECE [1]			ROMANIA			OTE GROUP		
		Units	2016	2017	2018	2016	2017	2018	2016	2017	2018
<b>Transport</b>											
	<b>Service vehicles</b>										
	Unleaded gasoline vehicles	#	1,111	921	716	141	60	18	1,252	981	734
	Diesel vehicles	#	1,726	1,949	2,093	2,485	2,573	2,632	4,211	4,522	4,725
	Distance covered	km	31,609,629	38,758,962	39,789,152	53,473,733	50,468,295	48,411,624	85,083,362	89,227,257	88,200,776
	<b>Company vehicles</b>										
	Unleaded gasoline vehicles	#	271	219	206	34	31	11	305	250	217
	Diesel vehicles	#	95	179	162	282	287	251	377	466	413
	Distance covered	km	5,064,374	8,116,042	7,150,740	4,987,647	4,983,467	4,237,439	10,052,021	13,099,509	11,388,179

[1] Data for OTE Globe and OTE Academy are not available for 2016.

[2] Energy consumption is based on actual consumption data for most months of a year, which is extrapolated to the end of that year due to data provision arrangements within the DT group, where relevant.

[3] The term "Buildings" describes Offices, Data Centers, Warehouses and Shops.

[4] Diesel oil and gasoline (for Romania only) consumption is included.

[5] "GHG emissions calculated include CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O and f-gases from AC systems.

To ensure harmonized reporting among DT Group companies, Global Warming Potential (GWP) values used, are those included in the 5th Assessment Report (AR) of IPCC. Past values (originally estimated with AR4 GWP values) have been recalculated."

[6] Direct GHG emissions from energy consumption are calculated on the basis of the emission factors suggested by the Greenhouse Gas Protocol and the 2005 IPCC Guidelines.

[7] Emissions are calculated on the basis of data concerning replenished quantities.

[8] "For consistency reasons among the DT Group companies, CO<sub>2</sub> emissions are estimated on the basis of the emission factors developed by the International Energy Agency. The non-CO<sub>2</sub> (i.e. CH<sub>4</sub> and N<sub>2</sub>O) emission factors for electricity derive from the latest National GHG emissions inventory and EUROSTAT data on gross electricity generation."

## Energy Conservation Measures

Energy conservation measures	Scope	Country	Result
Smart metering systems in base station sites with large energy consumption	<u>Telecom network</u>	Greece, Romania	420 systems were installed by the end of 2018 (COSMOTE). Smart metering systems are already installed in 32 locations (Romania)
Free cooling systems	<u>Telecom network</u>	Greece	The total number of free cooling systems already installed is 2,046 (COSMOTE).
Replacement of old equipment	<u>Telecom network</u>	Greece	In 2018 OTE and COSMOTE replaced 507 and 159 old rectifier units respectively. On average, efficiency improved from 80% to 92% for OTE and from 88% to 96% for COSMOTE.
Indoor Power Supply Units with A/C direct to battery cabinet	<u>Telecom network</u>	Greece	The installation of these systems aims to reduce energy consumption through the increase of internal temperature of Base Station (set point from 26°C to 30°C). Up to now, 245 systems have been already installed (COSMOTE)
Modernization of fixed telecom network	<u>Telecom network</u>	Greece	The transformation of the fixed network to VDSL, the removal of PSTN ports and the deactivation of associated equipment including AC units is in progress. Although the switch to VDSL will initially increase electricity consumption, a positive net benefit is expected after the deactivation of unused installations.
Hybrid systems	<u>Telecom network</u>	Greece	Installation of 4 new hybrid system (PV and batteries) in base stations with 24-hour electricity generator (COSMOTE).
Rational use of buildings and space consolidation	<u>Telecom network - Buildings</u>	Greece	Consolidation (geographical and spatial) of the hardware necessary for network management. In 2018, the building area used by OTE was reduced by about 5% compared to 2017.
Maintenance of electricity generators	<u>Telecom network</u>	Greece	A maintenance program covering more than 2,000 generators (for both 24-hour and emergency operation) was implemented. The program for the electrification of remote base stations is ongoing.
Energy retrofit of buildings	<u>Buildings / Stores</u>	Greece	Renovation activities are carried out in important buildings and shops where (a) smart metering devices are installed and (b) materials and equipment with significantly better energy performance are selected.
Energy retrofit of Data Centers	<u>Data Centers</u>	Greece	Energy conservation measures aiming to improve the performance of the equipment supporting IT load
Fleet renewal	<u>Road transport</u>	Greece, Romania	A tendering process for the purchase of 329 new service vehicles (gasoline and diesel) started in 2018 and is in progress
Teleconferences	<u>Mobility</u>	Greece	In 2018 9,877 audio-conferences and 19,654 video-conferences were held

# Independent Assurance Report

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

KPMG Advisors Single Member S.A. 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 2018 titled “OTE Group Sustainability Report 2018” (further referred to as the “Report”) for the reporting period 1 January 2018 - 31 December 2018.

### 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) 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 AA1000AP (2018)<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 Disclosures required by GRI Standards for the “Core” option which are mentioned in the GRI Content Index of the Appendix of the Report.

3 The reliability of the following Topic-Specific Disclosures for the “Material Topics” as they have been identified by OTE Group and its stakeholders, which are mentioned in the GRI Content Index of the Appendix of the Report:

- Economic Performance (GRI 103 Management Approach –“MA”- and Disclosure/ Indicator GRI 201-1).
- Corporate compliance policies (MA and Indicators GRI 205-1, GRI 205-3 and GRI 419-1).
- Employee training and skills development (MA and Indicator GRI 404-1).
- Data security and privacy (MA and Indicator GRI 418-1).
- Customer service and satisfaction (MA and relevant indicator: Results of surveys measuring customer satisfaction).
- Safe and responsible use of technology (MA).
- Business resilience (MA).

4 The reliability of the following Topic-Specific Disclosures which are mentioned in the GRI Content Index of the Appendix of the Report: GRI 206-1, GRI 302-1, GRI 302-3, GRI 305-1, GRI 305-2, GRI 305-4, GRI 306-2, GRI 403-2, GRI 416-1(referring to EMF issues), GRI 416-2 (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 Topic-Specific 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 AA1000AP (2018) criteria for the four principles of inclusivity, materiality, responsiveness and impact as described in the section titled “Accountability Principles Standard AA1000 Index” of the Appendix of the Report.

For the Report, OTE Group applies the GRI Standards 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 2018 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 2018 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 AA1000AP (2018), but also evaluates the reliability of selected sustainability performance information.

<sup>1</sup> 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.

<sup>2</sup> AA1000 Assurance Standard (AA1000AS, 2008) with 2018 Addendum, issued by AccountAbility.

<sup>3</sup> AA1000 Accountability Principles (2018), issued by AccountAbility.

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 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 Disclosures and the Topic-Specific 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, GERMANOS A.V.E.E., OTE Globe S.A., OTE Academy, Cosmote E-Value S.A., Telekom Romania Communications S.A. and Telekom Romania Mobile Communications 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 Topic-Specific 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 Topic-Specific 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 AA1000AP principles of Inclusivity, Materiality, Responsiveness and Impact (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 AA1000AP (2018) 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.

- In relation to the principle of impact, OTE Group could further enhance their approach by ensuring that the impacts identified continuously reflect the current societal trends and/or stakeholders' needs through the frequent implementation of a materiality analysis.

**Assurance Scopes 2, 3 and 4: On the reliability of the General Disclosures and the Topic-Specific 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 General Disclosures and the Topic-Specific Disclosures which are mentioned in the "Scope of our assurance engagement" above (as "Assurance Scopes" 2,3,4), 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 Topic-Specific 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 Topic-Specific 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 Single Member S.A.



George Raounas  
Partner  
Athens, June 10, 2019



<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.

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