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2019 Performance

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2019 GOALS	2019 PERFORMANCE	
<p>OTE Group</p> <p>OTE – COSMOTE: e-Bill penetration to 60% of customer base (2.34 mil customers)</p> <p>OTE – COSMOTE: usage of mobile apps by 75% of the smartphone customers</p> <p>OTE – COSMOTE: 17% of e-payments for the Group's services to take place through the Group's digital touchpoints</p>	F	See Digital Transformation
	F	See Digital Transformation
	P	See Digital Transformation
<p>Responsible Business</p> <p>OTE Group: Further deployment of Risk Appetite and Key Risk Indicators/ tolerance levels establishment</p> <p>OTE Group: Successful pilot implementation of IRMA (International Risk Management Application)</p> <p>OTE – COSMOTE – Germanos, COSMOTE E-Value, OTE Globe, Telekom Romania, Telekom Romania Mobile: “Compliance Corporate Culture Survey” 2019 – analysis of results and opportunities identified</p> <p>OTE-COSMOTE-Telekom Romania: Preparation for “External review” of CMS (Compliance, Procurement, Human Resources, Sales, Communication). Review of controls to verify proper implementation</p> <p>OTE Group: Human Rights trainings (e-learning and classroom) and workshops to enhance involvement and understanding for Human Rights issues.</p> <p>OTE Group: Enhance cyber-security incident response capabilities by implementing a Security Orchestration and Automation platform</p> <p>OTE Group: Introduce a new zero-trust architecture for flexible and secure network access.</p> <p>OTE Group: Data privacy e-learning</p>	IP	See Enterprise Risk Management
	F	See Enterprise Risk Management
	F	The results of the of the survey were successfully analyzed by the competent department and relevant opportunities were identified. See Compliance Management
	F	The implementation of CMS was reviewed and successfully externally reviewed for OTE, COSMOTE and Telekom Romania. See Compliance Management
	P	See Human Rights Management
	IP	See Security and Data Privacy
	P	See Security and Data Privacy
	F	See Security and Data Privacy
<p>Employees</p> <p>OTE Group: Create the future of work with agile teams and lean structures</p> <p>OTE Group: Ensure that our employees are ready to meet the challenges of the digital era by investing in upskilling and re-skilling</p> <p>OTE Group: Develop a culture of continuous growth</p>	F	See Human Resources Management and Employee Training and Skills Development
	F	See Employee Training and Skills Development
	F	See Human Resources Management and Employee Training and Skills Development

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

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2019 GOALS	2019 PERFORMANCE	
<p>Customers</p> <p>OTE – COSMOTE: Digitization, personalization and simplification of processes and interactions with customers in all customer service areas, while building a common digital culture</p> <p>OTE – COSMOTE: Empower Self Care through AI. Increase number of self-service options and improve effectiveness of transactions (% of transactions deflected in services without human intervention) through advanced dialogues using AI and natural language understanding (NLU).</p> <p>OTE – COSMOTE: Support growth and value development initiatives, via household / FMC (fixed/mobile convergence) approach, VSE (Very Small Enterprises) segment personalization and further built in B2B customer service</p>	<p>F</p> <p>F</p> <p>IP</p>	<p>See Customer Service and Satisfaction</p> <p>See Customer Service and Satisfaction</p> <p>See Customer Service and Satisfaction</p>
<p>Society</p> <p>OTE – COSMOTE: > 12,000 student participations in STEM and Educational Robotics initiatives and train-the-trainers programs for >3,000 teachers, for the next 2 years (2019-2020)</p> <p>OTE – COSMOTE: Enhance the participation of professionals and entrepreneurs in programs for the development of their small – medium enterprises and entrepreneurial skills for < 1,000 people</p> <p>OTE Group: Support of vulnerable Social Groups and programs that contribute to Society</p> <p>OTE Group: >15,000 visitors at the OTE Group Telecommunications Museum annually (2019-2020)</p>	<p>F</p> <p>F</p> <p>F</p> <p>IP</p>	<p>See Digital Skills for All</p> <p>See Digital Skills for All</p> <p>See Social Contribution</p> <p>See Digital Skills for All</p>
<p>INDEX KEY: F= Fully, P= Partially, IP= In Progress, N= Not achieved</p>		

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2019 GOALS	2019 PERFORMANCE	
<p>Climate and Environment</p> <p>OTE Group: Contribution to the achievement of the CO₂ emissions reduction target set for 2020 at DT Group level (20% reduction compared to 2008), by planning and implementing measures for energy conservation and CO₂ emissions reduction.</p> <p>OTE-COSMOTE: Reduction of CO₂ emissions (scope 1 and scope 2) by 20% compared to 2008 levels.</p> <p>OTE Group: Stabilization of electricity consumption in the telecom network at 2018 levels.OTE-COSMOTE: Improvement of energy performance of vehicles fleet by 5%.</p> <p>OTE Group: Recycling of 100% of hazardous and technical waste withdrawn.</p> <p>OTE-COSMOTE: Minimization of plastic use (Greece) by:</p> <ul style="list-style-type: none"> • Reducing the use of plastic bottles by 50% compared to 2018 • Reducing the use of disposable plastic cups (offices and restaurants) by 100% • Abolishing the use of plastic bags in the retail network by the end of 2019 <p>COSMOTE: Installation of 3 additional EMF measurement stations</p>	<p>F</p> <p>N</p> <p>N</p> <p>F</p> <p>F</p> <p>F</p> <p>N</p>	<p>See Energy and Climate Change Environmental Performance Data – Energy</p> <p>Scope 1 and scope 2 CO₂ emissions from energy consumption of OTE and COSMOTE decreased by 17%, compared to 2008. See Energy and Climate Change</p> <p>See Energy and Climate Change</p> <p>Energy performance of vehicles fleet improved by 4.9%</p> <p>See Circular Economy</p> <p>See Circular Economy</p> <p>In 2019, the “Pedion24” program was upgraded to include in its scope measurements on 5G frequencies. The installation of the planned measurement stations was postponed until completion of the upgrade. These measurement stations will be installed in 2020.</p>
<p>INDEX KEY: F= Fully, P= Partially, IP= In Progress, N= Not achieved</p>		

Accountability Principles Standard AA1000 Index

PRINCIPLE APPLIED	METHODS	REPORT LOCATION
Inclusivity	Identification of key stakeholders and dialogue to understand key issues	Sustainable Business Model Stakeholder Dialogue Additional Information for GRI Indicators
Materiality	Identification of issues which are important to the company and its stakeholders	Sustainable Business Model Stakeholder Dialogue Additional Information for GRI Indicators
Responsiveness	Responsiveness to key issues and transparency on performance	Sustainable Business Model Stakeholder Dialogue Additional Information for GRI Indicators
Impact	Analysis of direct and indirect impact of the company's actions.	Sustainable Business Model Key Achievements and targets Stakeholder Dialogue Employee Training and Skills Development Digital Skills for All Circular Economy

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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, 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 2019 Integrated Report includes a detailed presentation of the companies’ priorities, activities, goals and outcomes, responding to all 21 criteria of Advanced CoP.



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

We welcome feedback on its contents.

CRITERIA	REPORT LOCATION
<p>Implementation of the Ten Principles into Strategies & Operations</p> <p>1 The COP describes mainstreaming into corporate functions and business units 2 The COP describes value chain implementation</p>	<p>Sustainable Business Model Responsible Purchasing and Supply Chain Management</p>
<p>Robust Human Rights Management Policies & Procedures</p> <p>3 The COP describes robust commitments, strategies or policies in the area of human rights 4 The COP describes effective management systems to integrate the human rights principles 5 The COP describes effective monitoring and evaluation mechanisms of human rights integration</p>	<p>Human Rights Management Human Rights Management Human Rights Management</p>
<p>Robust Labour Management Policies & Procedures</p> <p>6 The COP describes robust commitments, strategies or policies in the area of labour 7 The COP describes effective management systems to integrate the labour principles 8 The COP describes effective monitoring and evaluation mechanisms of labour principles integration</p>	<p>Employees Employees Employees</p>
<p>Robust Environmental Management Policies & Procedures</p> <p>9 The COP describes robust commitments, strategies or policies in the area of environmental stewardship 10 The COP describes effective management systems to integrate the environmental principles 11 The COP describes effective monitoring and evaluation mechanisms for environmental stewardship</p>	<p>Climate and Environment Climate and Environment Climate and Environment</p>

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CRITERIA	REPORT LOCATION
<p>Anti-Corruption Management Policies & Procedures</p> <p>12 The COP describes robust commitments, strategies or policies in the area of anti-corruption</p> <p>13 The COP describes effective management systems to integrate the anti-corruption principle</p> <p>14 The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption</p>	<p>Compliance Management</p> <p>Compliance Management</p> <p>Compliance Management</p>
<p>Taking Action in Support of Broader UN Goals and Issues</p> <p>15 The COP describes core business contributions to UN goals and issues</p> <p>16 The COP describes strategic social investments and philanthropy</p> <p>17 The COP describes advocacy and public policy engagement</p> <p>18 The COP describes partnerships and collective action</p>	<p>Sustainable Business Model, Key Achievements and Targets</p> <p>Social Contribution</p> <p>Policies and Management of Regulatory, Compliance Management, Connectivity for All</p> <p>Awards and Memberships, Additional Information for GRI Indicators</p>
<p>Corporate Sustainability Governance and Leadership</p> <p>19 The COP describes CEO commitment and leadership</p> <p>20 The COP describes Board adoption and oversight</p> <p>21 The COP describes stakeholder engagement</p>	<p>Corporate Governance Structure and Members</p> <p>Corporate Governance Structure and Members</p> <p>Stakeholder Dialogue, Additional Information for GRI Indicators</p>

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ATHEX Guide Index

	ESG METRIC ID	METRIC TITLE	SECTION / COMMENTS
ATHEX ESG Metrics			
Environmental			
Core Metrics	C-E1	Scope 1 emissions	Energy and Climate Change Environmental Performance Data - Energy
	C-E2	Scope 2 emissions	Energy and Climate Change Environmental Performance Data - Energy
	C-E3	Energy consumption within the organization	Energy and Climate Change
Advanced Metrics	A-E1	Scope 3 emissions	Energy and Climate Change
	A-E2	Climate change risks and opportunities	Risk and Uncertainties for the Next Year Energy and Climate Change 2019 Annual Financial Report Detailed information concerning climate change risks and opportunities identified, can be found in the latest response of OTE to CDP
Sector-specific	SS-E8	Critical materials	Global Reporting Initiative Content Index (GRI 301-2)
Social			
Core Metrics	C-S1	Female employees	Employment Human Resources Performance Data
	C-S2	Female employees in management positions	Fair Employment Policy Framework and Equal Opportunities Human Resources Performance Data
	C-S3	Turnover rates	Employment Human Resources Performance Data
	C-S4	Employee training	Employee Training and Skills Development Human Resources Performance Data
	C-S5	Human rights policy	Human Rights Management
	C-S6	Collective bargaining agreements	Fair Employment Policy Framework and Equal Opportunities
	C-S7	Supplier assessment	Responsible Purchasing and Supply Chain Management
Advanced Metrics	A-S1	Stakeholder engagement	Stakeholder Dialogue
	A-S2	Employee training expenditure	Employee Training and Skills Development Human Resources Performance Data
	A-S3	Gender pay gap	Fair Employment Policy Framework and Equal Opportunities
Sector-specific	SS-S2	Customer privacy	Security and Data Privacy
	SS-S3	Legal requests of user data	Security and Data Privacy
	SS-S5	Data security and privacy fines	Security and Data Privacy

ATHEX Guide Index

	ESG METRIC ID	METRIC TITLE	SECTION / COMMENTS
ATHEX ESG Metrics			
Governance			
Core Metrics	C-G2	Business ethics policy	Human Rights Management
	C-G3	Data security policy	Security and Data Privacy
Advanced Metrics	A-G1	Business model	Sustainable Business Model
	A-G2	Materiality	Stakeholder Dialogue
	A-G3	ESG targets	Key Achievements and Targets
Sector-specific	A-G5	External assurance	Independent Assurance Report

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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 2019 Sustainability Report

CRITERIA	REPORT LOCATION
Strategy 1. Strategic analysis and action 2. Materiality 3. Objectives 4. Value chain management	Sustainable Business Model Stakeholder Dialogue Key Achievements and Targets 2019 Performance Responsible Purchasing and Supply Chain Management
Process Management 5. Responsibility 6. Rules and procedures 7. Monitoring 8. Rewarding schemes and motives for sustainable development 9. Stakeholders engagement 10. Responsible products and innovation	Corporate Governance Structure and Members Enterprise Risk Management Compliance Management Integrated Management System Sustainable Business Model Key Achievements and Targets Corporate Governance Structure and Members Integrated Management System Independent Assurance Report Corporate Governance Structure and Members Employee Selection, Attracting and Retaining Talented Employees Stakeholder Dialogue Additional Information for GRI Indicators / Stakeholders Products and Service for Sustainability Energy and Climate Change
Environment 11. Use of natural resources 12. Management of resources 13. Climate relevant emissions	Energy and Climate Change Circular Economy Energy and Climate Change Circular Economy Environmental Performance Data - Waste Energy and Climate Change Other Environmental Aspects Environmental Performance Data - Energy
Society 14. Employment rights 15. Equal opportunities 16. Qualifications 17. Human rights in the supply chain 18. Corporate citizenship 19. Initiatives and political influence 20. Corruption prevention and fighting	Human Rights Management Fair Employment Policy Framework and Equal Opportunities Human Resources Performance Data OTE Group Code of Human Rights and Social Principles OTE Group Policy on Employee Relations Human Rights Management Fair Employment Policy Framework and Equal Opportunities Health and Safety OTE Group Social Charter Human Resources Management Employment Employee Selection, Attracting and Retaining Talented Employees Employee Training and Skills Development Human Resources Performance Data Human Rights Management Responsible Purchasing and Supply Chain Management OTE Group Code of Human Rights and Social Principles Group Presentation Key Achievements and Targets Connectivity for All Social Contribution Awards and Memberships Compliance Management Compliance Management

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Global Reporting Initiative Content Index

The OTE Group 2019 Sustainability Report is “in accordance” with the GRI Standards at “core” level

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

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GRI STANDARDS	DISCLOSURE	SECTION
	Strategy 102-14 Statement from senior decision-maker	Message from the Chairman and CEO
	Ethics and integrity 102-16 Values, principles, standards, and norms of behaviour	Sustainable Business Model Compliance Management , Integrated Management System Additional Information for GRI Indicators / Integrated Management System
	Governance 102-18 Governance structure	Corporate Governance Structure and Members
	Stakeholder engagement 102-40 List of stakeholder groups	Stakeholder Dialogue Additional Information for GRI Indicators / Stakeholders Fair Employment Policy Framework and Equal Opportunities
	102-41 Percentage of employees covered by collective bargaining agreements 102-42 Identifying and selecting stakeholders 102-43 Approach to stakeholder engagement	Stakeholder Dialogue Additional Information for GRI Indicators / Stakeholders Report Profile Sustainable Business Model Stakeholder Dialogue Customer Service and Satisfaction Employee Communication, Engagement and Satisfaction Additional Information for GRI Indicators / Stakeholders Additional Information for GRI Indicators / Stakeholders
	102-44 Key topics and concerns raised by stakeholders	Additional Information for GRI Indicators / Stakeholders

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GRI STANDARDS	DISCLOSURE	SECTION
	<p>Reporting practice</p> <p>102-45 Entities included in the consolidated financial statements</p> <p>102-46 Process for defining report content</p> <p>102-47 Material topics</p> <p>102-48 Re-statements of information</p> <p>102-49 Significant changes in reporting</p> <p>102-50 Reporting period</p> <p>102-51 Date of most recent report</p> <p>102-52 Reporting cycle</p> <p>102-53 Contact point</p> <p>102-54 Claims of reporting in accordance with the GRI Standards</p> <p>102-55 GRI content index</p> <p>102-56 External assurance policy</p>	<p>Report Profile</p> <p>Group Presentation</p> <p>Report Profile</p> <p>Stakeholder Dialogue</p> <p>Additional Information for GRI Indicators / Materiality Analysis</p> <p>Stakeholder Dialogue</p> <p>Report Profile</p> <p>Report Profile</p> <p>Report Profile</p> <p>The most recent published report covers the period from January 1 to December 31, 2018.</p> <p>Annual Report</p> <p>Report Profile</p> <p>Report Profile</p> <p>Global Reporting Initiative Content Index</p> <p>Independent Assurance Report</p>
Topic-Specific Standards		
Material Issue: Economic Performance		
GRI 103 Management Approach 2016	<p>103-1 Explanation of the material topic and its Boundary</p> <p>103-2 The management approach and its components</p> <p>103-3 Evaluation of the management approach</p>	<p>Sustainable Business Model</p> <p>Key Achievements and Targets</p> <p>Additional Information for GRI Indicators / Materiality Analysis</p>
GRI 201 Economic Performance 2016	<p>201-1 Direct economic value generated and distributed</p> <p>201-2 Financial implications and other risks and opportunities due to climate change</p> <p>201-4 Financial assistance received from government</p>	<p>Key Achievements and Targets</p> <p>Products and Service for Sustainability</p> <p>Energy and Climate Change</p> <p>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</p>



GRI STANDARDS	DISCLOSURE	SECTION
Market Presence		
GRI 202 Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage 202-2 Proportion of senior management hired from the local community	Fair Employment Policy Framework and Equal Opportunities 85% of Chief Officers and Executive Directors are local citizens
Indirect Economic Impacts		
GRI 203 Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported 203-2 Significant indirect economic impacts	Connectivity for All Social Contribution Electromagnetic Fields Other Environmental Aspects Key Achievements and Targets Products and Service for Sustainability Connectivity for All Social Contribution Access to Digital Society
Procurement Practices		
GRI 204 Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Responsible Purchasing and Supply Chain Management



GRI STANDARDS	DISCLOSURE	SECTION
Material Issue: Corporate compliance policies		
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	Compliance Management Additional Information for GRI Indicators / Materiality Analysis
GRI 205 Anti-corruption 2016	205-1 Operations assessed for risks related to corruption 205-2 Communication and training about anti-corruption policies and procedures 205-3 Confirmed incidents of corruption and actions taken	Compliance Management Compliance Management Compliance Management
GRI 419 Socioeconomic Compliance 2016	419-1 Non-compliance with laws and regulations in the social and economic area	Compliance Management
Anti-competitive Behavior		
GRI 206 Anti-competitive behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Compliance Management

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GRI STANDARDS	DISCLOSURE	SECTION
Materials		
GRI 301 Materials 2016	301-1 Materials used by weight or volume 301-2 Recycled input materials used	<p>Circular Economy</p> <p>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). OTE Group, as described in the OTE Group Supplier Code of Conduct, requires its suppliers to take a precautionary approach towards environmental challenges, use resources responsibly and to limit, or avoid where possible, the use of rare resources. Conflict minerals are also addressed in the OTE Group Supplier Code of Conduct.</p>
	301-3 Reclaimed products and their packaging materials	<p>Circular Economy</p> <p>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.</p>
	Energy	
GRI 302 Energy 2016	302-1 Energy consumption within the organization	Energy and Climate Change
	302-3 Energy intensity	Environmental Performance Data - Energy
	302-4 Reduction of energy consumption	Energy and Climate Change
	302-5 Reductions in energy requirements of products and services	Environmental Performance Data - Energy
	302-5 Reductions in energy requirements of products and services	Energy and Climate Change



GRI STANDARDS	DISCLOSURE	SECTION
Water		
GRI 303 Water 2016	303-1 Water withdrawal by source 303-2 Water sources significantly affected by withdrawal of water 303-3 Water recycled and reused	<p>Circular Economy Water consumed is acquired solely from public water companies which are responsible not only for water supply but also for the sustainable uptake of water from the available water resource systems. Thus, water sources are not significantly affected by OTE Group activities.</p> <p>Circular Economy</p>
Biodiversity		
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 304-2 Significant impacts of activities, products, and services on biodiversity 304-3 Habitats protected or restored 304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	<p>Other Environmental Aspects 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 style="list-style-type: none"> • 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). • All potential impacts are addressed in the Environmental Impact Assessment studies carried out and submitted for approval to the designated authorities as foreseen by national legislation in force. In these studies, special reference is made to protected areas (NATURA, SPA, RAMSAR, CORINE, IBA) and areas of high biodiversity value that are near to the activities of OTE Group companies. The contents of these studies and the approval process, that includes a public consultation phase, are specified in the relevant legislative acts. These studies, on the basis of current scientific knowledge, conclude that impacts on biodiversity are not material, and therefore there are no protected and / or restored habitat areas that are affected by the operation of OTE Group. • In the case of smaller base stations installed in protected areas, an Environmental Impact Assessment is not required. In these cases, a Statement of Standard Environmental Commitments is submitted to the Hellenic Telecommunications & Post Commission accompanied by a Special Environmental Assessment' • The majority of the installations are small, without permanent personnel and with limited transportation activities at the operational stage.

GRI STANDARDS	DISCLOSURE	SECTION
Emissions		
GRI 305 Emissions 2016	305-1 Direct (Scope 1) GHG emissions 305-2 Energy indirect (Scope 2) GHG emissions 305-3 Other indirect (Scope 3) GHG emissions 305-4 GHG emissions intensity 305-5 Reduction of GHG emissions 305-6 Emissions of ozone-depleting substances (ODS) 305-7 Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Energy and Climate Change Other Environmental Aspects Environmental Performance Data - Energy Energy and Climate Change Environmental Performance Data - Energy Energy and Climate Change Energy and Climate Change Energy and Climate Change Environmental Performance Data - Energy Other Environmental Aspects Additional Information for GRI Indicators / Direct Non-GHG Emissions
Effluents and Waste		
GRI 306 Effluents and Waste 2016	306-1 Water discharge by quality and destination 306-2 Waste by type and disposal method 306-3 Significant spills 306-4 Transport of hazardous waste 306-5 Water bodies affected by water discharges and/or runoff	Circular Economy Circular Economy Environmental Performance Data - Waste Circular Economy There were no significant spills during the management of batteries and lubricants Circular Economy Circular Economy
Environmental Compliance		
GRI 307 Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	The fines (related to the environment) imposed in 2019 amounted to € 11,366, 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.



GRI STANDARDS	DISCLOSURE	SECTION
Supplier Environmental Assessment		
GRI 308 Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Responsible Purchasing and Supply Chain Management
	308-2 Negative environmental impacts in the supply chain and actions taken	Responsible Purchasing and Supply Chain Management
Employment		
GRI 401 Employment 2016	401-1 New employee hires and employee turnover	Employment Human Resources Performance Data
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Additional Information for GRI Indicators / Employee Benefits
	401-3 Parental leave	All employees, female and male, returned to their normal duties
Labor/Management Relations		
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
Occupational Health and Safety		
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	Health and Safety Additional Information for GRI Indicators / Health and Safety Performance Human Resources Performance Data



GRI STANDARDS	DISCLOSURE	SECTION
Material Issue: Employee training and skills development		
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	Employee Training and Skills Development Additional Information for GRI Indicators / Materiality Analysis
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	Employee Training and Skills Development Human Resources Performance Data Employee Selection, Attracting and Retaining Talented Employees Employee Training and Skills Development Employee Selection, Attracting and Retaining Talented Employees
Diversity and Equal Opportunity		
GRI 405 Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Employment Fair Employment Policy Framework and Equal Opportunities Human Resources Performance Data OTE Group Code of Human Rights and Social Principles OTE Group Policy on Employee Relations Minority group membership is not a material issue for the operation of OTE Group in Greece
Equal Remuneration for Women and Men		
GRI 405 Diversity and Equal Opportunity 2016	405-2 Ratio of basic salary and remuneration of women to men	Fair Employment Policy Framework and Equal Opportunities
Non-discrimination		
GRI 406 Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Human Rights Management

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GRI STANDARDS	DISCLOSURE	SECTION
Freedom of Association and Collective Bargaining		
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	Human Rights Management Fair Employment Policy Framework and Equal Opportunities Responsible Purchasing and Supply Chain Management OTE Group Code of Human Rights and Social Principles OTE Group Policy on Employee Relations
Child Labor		
GRI 408 Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Human Rights Management Responsible Purchasing and Supply Chain Management OTE Group Code of Human Rights and Social Principles OTE Group Policy on Employee Relations
Forced or Compulsory Labor		
GRI 409 Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Human Rights Management Responsible Purchasing and Supply Chain Management OTE Group Code of Human Rights & Social Principles
Investment		
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	Human Rights Management Human Rights Management Human Rights Management

GRI STANDARDS	DISCLOSURE	SECTION
Local Communities		
GRI 413 Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs 413-2 Operations with significant actual and potential negative impacts on local communities	Social Contribution Social Contribution Electromagnetic Fields Other Environmental Aspects Environmental protection expenditures for 2019 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.
Supplier Social Assessment		
GRI 414 Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria 414-2 Negative social impacts in the supply chain and actions taken	Responsible Purchasing and Supply Chain Management Responsible Purchasing and Supply Chain Management
Public Policy		
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.
Customer Health and Safety		
GRI 416 Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Communication with Customers Electromagnetic Fields Communication with Customers Electromagnetic Fields

GRI STANDARDS	DISCLOSURE	SECTION
Marketing Communications		
GRI 417 Marketing and Labelling 2016	417-1 Requirements for product and service information and labelling	Communication with Customers
	417-2 Incidents of non-compliance concerning product and service information and labelling	Communication with Customers
	417-3 Incidents of non-compliance concerning marketing communications	Communication with Customers
Material Issue: Data Security and Privacy		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Security and Data Privacy, Additional Information for GRI Indicators / Materiality Analysis
	103-2 The management approach and its components	
	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	Security and Data Privacy
Material Issue: Customer Service and Satisfaction		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Customer Service and Satisfaction Additional Information for GRI Indicators / Materiality Analysis
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach Results of surveys measuring customer satisfaction	
GRI 418 Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Customer Service and Satisfaction
Material Issue: Safe and Responsible Use of Technology		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Safe and Responsible Use of Technology Additional Information for GRI Indicators / Materiality Analysis
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	

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GRI STANDARDS	DISCLOSURE	SECTION
Material Issue: Business Resilience		
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	Business Continuity Additional Information for GRI Indicators / Materiality Analysis

Additional Information for GRI Indicators

Memberships (Relevant for GRI Standards 102-12, 102-13)

ORGANIZATION / INITIATIVE	COMPANY	PARTICIPATION TYPE
Greece / Romania		
Hellenic Network for Corporate Social Responsibility	OTE Group	Member since 2001.
UN Global Compact (UNGC)	OTE	OTE and COSMOTE has been a member of the Hellenic branch UN Global Compact since 2008. From 2018, OTE participates directly in the international UN Global Compact according to the new implemented policy.
Global Compact Network Hellas (GCNH)	OTE	Founding member as of 2018 (according to the new implemented policy of UNGC)
Hellenic Federation of Enterprises (SEV) Council for Sustainable Development	OTEGLOBE	Member since 2014
The Sustainable Greece 2020 Initiative	OTE Group	Participation as "Ambassadors of Sustainability", since 2014. The Sustainable Greece 2020 initiative aims to create a structured dialogue and develop methodologies and tools that will support Greece's course towards sustainable development at both micro- and macro-economic level.
Corporate Responsibility Institute, Greece	OTE	Member since 2008
Global Sustain	OTE Group	Member since 2007
Hellenic Institute of Entrepreneurship and Sustainable Development	OTE Group	Member since 2013
Road Safety Institute "Panos Mylonas" and Roads to the Future" Alliance for safety and courtesy on the road	COSMOTE	Member and sponsor since 2009
Code of Conduct for value-add-ed services provided through mobile phones and for the protection of juvenile users	COSMOTE	Participant since 2006 In 2008, the Code was adjusted to European Standards
Association of Mobile Telephony Companies (EEKT)	COSMOTE	Founding member since 2008
Association of Romanian Mobile Operators	Telekom Romania Mobile Communications	Partner since 2010
United Nations Global Compact - Global Compact Network Romania	Telekom Romania Mobile Communications	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.

Memberships (Relevant for GRI Standards 102-12, 102-13)

ORGANIZATION / INITIATIVE	COMPANY	PARTICIPATION TYPE
Europe		
European Telecommunications Network Operators' Association (ETNO)	OTE Telekom Romania Communications	Founding member of ETNO since 1992 and member of Sustainable Development Working Group since 2007. OTE signed the Sustainability Charter in 2011 Member
European Telecommunications Standards Institute (ETSI)	COSMOTE	Member since 1998
ICT Coalition for the Safer Use of Connected Devices and Online Services by Children and Young People in the EU	OTE COSMOTE Telekom Romania Mobile Communications	Participation since 2013, as member of Deutsche Telekom Group
European Memorandum for Safer Mobile Use by children and younger teenagers	COSMOTE	Participant since 2007
Internationally		
GSM Association (GSM)	COSMOTE Telekom Romania Mobile Communications	Member of the World Association of Mobile Communications Services since 1997. COSMOTE actively participates in many of its workgroups. Member
International Telecommunication Union (ITU)	OTE Telekom Romania Communications	Associated member (OTE has been following ITU activities since the beginning of 1990) Partner since 2015

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

MOST IMPORTANT ISSUES FOR MANAGEMENT & STAKEHOLDERS	DEMARCATIION (INSIDE / OUTSIDE COMPANIES)
<p>1. Economic Performance</p> <p>3. Corporate compliance policies</p> <p>6. Business Resilience</p> <p>7. Data security and privacy</p> <p>8. Safe and responsible use of technology</p> <p>13. Employee training and skills development</p> <p>18. Customer service and satisfaction</p>	<p>The issue is primarily internal, has an impact on the operation of the companies, and may affect their shareholders, employees, suppliers and customers</p> <p>The issue is primarily internal, has an impact on the operation of the companies and their employees</p> <p>The issue is primarily internal, has an impact on the operation of the companies, and may affect their shareholders, employees, suppliers and customers</p> <p>The issue is primarily internal and has an impact on the operation of the companies and is likely to affect all their stakeholders</p> <p>The issue is primarily external and has an impact on their customers</p> <p>The issue is primarily internal, has an impact on the operation of the companies and their employees</p> <p>The issue is internal, has an impact on the operation of the companies and their employees, and external as it directly affects their customers</p>

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Issue

	Corporate compliance policies	Employees' compliance & grievance mechanisms	Human rights	Data security and privacy	Safe and responsible use of technology	Employee health, safety & wellness	Employee training and skills development	Research & innovation	Responsible communication with customers	Customer service and satisfaction	Electromagnetic fields (EMF)
SHAREHOLDERS, BONDHOLDERS, INVESTORS AND ANALYSTS	●			●	●				●	●	
CUSTOMERS AND PROSPECTIVE CUSTOMERS			●	●					●	●	●
EMPLOYEES, PROSPECTIVE EMPLOYEES AND THEIR REPRESENTATIVES			●	●		●	●			●	
BUSINESS		●		●	●				●	●	
SCIENCE, RESEARCH AND EDUCATION ORGANIZATIONS	●		●	●					●	●	
NON PROFIT ORGANIZATIONS / NGOs	●		●	●		●				●	
MEDIA		●		●				●	●	●	
STATE / GOVERNMENT ENTITIES				●	●			●	●	●	
SUPPLIERS	●		●	●	●					●	

Stakeholder

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

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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 ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
Customers and prospective customers	Customer satisfaction surveys CR surveys Tracking studies Call centers Customer account managers Social media Sales network Companies' websites Key account managers Presentations on OTE systems Companies' mailboxes Press releases Corporate announcements Business Conferences Business Customer Events Advertisements Sustainability Report	Annual Annual Quarterly Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Ongoing Annual	<ul style="list-style-type: none"> • Activation of products, quality of services (in relation to costs) • Technical support (e.g. web hosting, DNS services, IPVPN) • Commercial and billing issues • Mobile telephony operations • Improving the way customer complaints are handled • Safe use of services • EMF • Responsible Marketing (e.g. consumer rights) • Introduction of new technologies • Data security and privacy • Road reconstructions, retaining walls etc. 	Customers Society Electromagnetic Fields
Business	Press releases Economic Results Releases Roadshows Meetings Conference calls Annual reports Presentations Trainings Sustainability Report	Ongoing Quarterly Ongoing Ongoing Ongoing Annual Ongoing Ongoing Ongoing Annual	<ul style="list-style-type: none"> • Corporate governance • Economic performance • Market Presence • Procurement Practices • Employment • Joint actions to improve the competitive environment and influence the Greek state policies • Actions to reduce cost and optimize coverage 	OTE Group Customers Employees
Science, research and education	Meetings Conference calls E-mails Dissemination activities (workshops, conferences, etc.) Conferences Surveys Sustainability Report	Frequently Ongoing Ongoing Frequently Ongoing Ongoing Annual	<ul style="list-style-type: none"> • New technology products and services • Communication safety • Technology awareness 	Products and Services for Sustainability Safe and Responsible Use of Technology Social Contribution

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STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
NGOs and interest groups	Meetings Sustainability surveys Conferences E-mails Working groups Consultation Sustainability Report	Bi-annually Annual Ongoing Ongoing Ongoing Ongoing Annual	<ul style="list-style-type: none"> Importance of adopting CR Internet Safety public education Support for vulnerable groups and charities Social Contribution EMF, Biodiversity Environmental performance 	Sustainability Report (all sections)
Media	Announcements / Press releases Informational material Events / Press conferences Other media contacts Sustainability surveys Sustainability Report	Ongoing Ongoing Ongoing Ongoing Annual Annual	<ul style="list-style-type: none"> Management HR issues Industry developments and market structure Technology advances/network infrastructure New product launches TV market Technology and telecommunications Business and finance policies Culture CR 	Sustainability Report (all sections)
State / Government entities	Consultations on proposed laws and regulatory frameworks for telecommunication markets Written or verbal communication with regulatory and public sector bodies Dialogue with representatives of national and local authorities Sustainability surveys Attendance in associations and unions Systematic liaison with local authorities (mostly regional) Sustainability Report	Ongoing Ongoing Ongoing Annual Ongoing Ongoing Annual	<ul style="list-style-type: none"> Implementation of regulatory measures applying to OTE Issues of effective regulatory adjustment Specialized national goals for European Digital Agenda Strategy Transparency Governance Economic growth Energy and environment Infrastructure construction and maintenance Social security 	<p>OTE Group Compliance Management</p> <p>Connectivity for All</p> <p>Communication with Customers</p> <p>Social Contribution</p> <p>Environmental Strategy</p> <p>Corporate Governance</p> <p>Structure and Members</p>

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STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
<p>Employees, prospective employees and their representatives</p>	<p>OTE Group companies' Intranets Decisions on all important Company issues Meetings with employees Negotiations with unions and work councils Emails from the CEO-Chairman and General Directors Employee satisfaction surveys Employee surveys results roll out and follow up process Sustainability surveys Events Performance appraisal system Trainings Feedback tools Other surveys Workshops / labs Formal company policies / processes Newsletter (electronic) Internal Communication Campaigns Sustainability Report</p>	<p>Ongoing Ongoing Ongoing Periodic Periodic Biennial Periodic Annual Periodic Annual Ongoing Ongoing Annual Periodic Ongoing Bi-weekly Ongoing Annual</p>	<ul style="list-style-type: none"> • Labor cost rationalization and alignment • Organizational effectiveness • Collective Bargaining Agreements • Fair employment policy (diversity, work/life balance, nondiscrimination, equal opportunities) • Health and safety • Employee development • Leadership • Training • Performance management • Recruitment • Talent management • Engagement and satisfaction • Employees benefits • Corporate volunteerism • Strategy and all corporate information dissemination • Compliance issues • Security matters 	<p>Sustainable Business Model Human Rights Management Business Security and Data Privacy Employees Employee Volunteering</p>
<p>Suppliers</p>	<p>Consultation and dialogue on procurement policy / supplier code of conduct issues Attendance in sector-based unions Meetings Sustainability surveys Suppliers' evaluation Negotiations Presentation of new products Consultation and dialogue on technical issues Sustainability Report</p>	<p>Ongoing Ongoing Ongoing Annual Ongoing Ongoing Ongoing Ongoing Periodic Annual</p>	<ul style="list-style-type: none"> • Tender criteria and competitions • Communication on supplies issues • Transparency • Market Policy • Economic growth • Inserting CR criteria, including environmental criteria • Procurement best practices • Procurement trends 	<p>OTE Group Responsible Purchasing and Supply Chain Management</p>

STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
Analysts and investors	Investor Relations Department communication Annual General Shareholders Meeting Annual, Corporate governance report and Sustainability Report Sustainability surveys Participation in corporate responsibility ratings Private meetings Conference Calls Meetings of executives Adoption and implementation of policies and principles Daily collaboration Conferences arranged by brokers Dedicated Website (www.otewholesale.gr) Sales Department OTE Systems presentations to telecom provider Special mailbox (otewholesale@ote.gr) Press Releases Corporate announcements	Ongoing Annual Annual Annual Ongoing Ongoing Quarterly Ongoing Ongoing Ongoing Regularly Ongoing Ongoing Ongoing Ongoing Ongoing	<ul style="list-style-type: none"> • Financial performance • Short and longer term outlook • Competitive environment • Cashflow • Debt issuance and repayment • Dividends • Group strategy and results • Outlook on labor relations, regulatory decisions, economic conditions • Climate change policy 	Sustainability Report (all sections)

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Integrated Management System (Relevant for GRI Standard 102-16)

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 System, as per ISO 9001	•	•	•	•	•	•
Environmental Management System, as per ISO 14001	•	•			•	•
Occupational Health & Safety Management System, as per ISO 45001 (OTE – COSMOTE) / OHSAS 18001 (Telekom Romania)	•	•			•	•
Information Security Management System, as per ISO 27001	•	•	•		•	•
Information Technology- Service Management, as per ISO 20000-1	•	•			•	•
Business Continuity Management System, as per ISO 22301	•	•			•	•
Energy Management System, as per ISO 50001	•	•				
Risk Management System, as per ISO 31000	•	•			•	•
Anti-bribery Management System, as per ISO 37001	•	•			•	•
Compliance Management System, as per ISO 19600	•	•			•	•
General Requirements for the Competence of Testing and Calibration Laboratories, as per ISO 17025		•				
Principles and Guidelines for Good Distribution Practice of Medical Devices, acc. to Decision 1348/04	•	•				
Industrial Safety Certification (EKBA) Greek Legislation “Government Gazette B 336 - 16.03.2005”	•	•				
“Assurance reports on controls at a service organization” as per ISAE 3402 Type 2 Report and “Assurance Engagements other than Audits or Reviews of Historical Financial Information” as per ISAE 3000 Type 2 Report	•	•				

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Employee Benefits (Relevant for GRI Standard 401-2)

A number of employee benefits are offered to OTE Group employees. The benefits vary per company.

MAIN BENEFITS TO OTE GROUP EMPLOYEES PER CATEGORY IN 2019

Insurance

- Health insurance program for all 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 OTE TV for all employees, but also ability to purchase company products at special prices
- 30% discount at mobile phone fees offered to employees family members
- Ability to purchase products through the Group's shops with special discounts for OTE and COSMOTE employees

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 & quick food canteens, through central premises of the company
- Settlement of expenses for work commuting
- Medical services for employees

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
- Financial support through "Fund for Mutual Help" for health expenses
- Christmas gifts to employees' children
- Privileged mobile program for employees' children who are students
- Easter money gift for all employees
- Pregnancy and maternity leave for child care

Free time - Vacation

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

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
- Outdoor training

Ability to participate in Wellness & fitness programs:

- Daily training at an integrated gym on Paiania premises
- Physical exercise programs at Headquarters
- Nutrition care programs at Headquarters & Paiania premises
- Psychotherapist expert sessions at Headquarters

Provision of special price offers that can be accessed through various sport and wellness providers.

Employee support and counseling

- 24/7 anonymous and confidential helpline called NEXT TO YOU developed to empower and support OTE, COSMOTE and GERMNAOS employees and their families, in every aspect of their everyday life, while contributing to maintaining their wellness at high levels

Human Resources Performance Data

Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2017	2018	2019	2017	2018	2019	2017	2018	2019
Total workforce (headcount on 31st of December)		12,768	12,419	12,016	6,373	6,211	4,874	19,141	18,630	16,890
Employment type										
Full - time dependent employment with indeterminate term contracts	Number (%)	11,981 (93.8%)	11,781 (94.9%)	11,533(96.0%)	5,799(91.0%)	5,810(93.5%)	4,756 (97.6%)	17,780 (92.9%)	17,591 (94.4%)	16,289 (96.4%)
Part - time dependent employment with indeterminate term contracts	Number (%)	704 (5.5%)	564 (4.5%)	419 (3.5%)	14 (0.2%)	10 (0.2%)	10 (0.2%)	718 (3.8%)	574 (3.1%)	429 (2.5%)
Dependent employment, on fixed-term	Number (%)	83 (0.7%)	74 (0.6%)	64 (0.5%)	560 (8.8%)	391 (6.3%)	108 (2.2%)	643 (3.4%)	465 (2.5%)	172 (1.0%)
Gender										
Male	Number (%)	7,866 (61.6%)	7,635 (61.5%)	7,334 (61.0%)	3,634 (57.0%)	3,528 (56.8%)	2,815 (57.8%)	11,500 (60.1%)	11,163 (59.9%)	10,149 (60.1%)
Female	Number (%)	4,902 (38.4%)	4,784 (38.5%)	4,682 (39.0%)	2,739 (43.0%)	2,683 (43.2%)	2,059(42.2%)	7,641 (39.9%)	7,467 (40.1%)	6,741 (39.9%)
Age										
Under 30 years	Number (%)	760 (6.0%)	588 (4.7%)	396 (3.3%)	1,106 (17.4%)	1,153 (18.6%)	628 (12.9%)	1,866 (9.7%)	1,741 (9.3%)	1,024 (6.1%)
Between 31 and 50 years	Number (%)	9,818 (76.9%)	9,456 (76.1%)	9,157 (76.2%)	4,403 (69.1%)	3,916 (63.0%)	3,051 (62.6%)	14,221 (74.3%)	13,372 (71.8%)	12,208 (72.3%)
Over 51 years	Number (%)	2,190 (17.2%)	2,375 (19.1%)	2,463 (20.5%)	864 (13.6%)	1,142 (18.4%)	1,195 (24.5%)	3,054 (16.0%)	3,517 (18.9%)	3,658 (21.7%)
Number of employees - by employee seniority										
Total no of employees included in the top 10% of empl. by total compensation	Number			1,201			488			1,689
Male	Number (%)			839 (69.9%)			300 (61.5%)			1,139 (67.4%)
Female	Number (%)			362 (30.1%)			188 (38.5%)			550 (32.6%)
Total no of employees incl. in the bottom 90% of empl. by total compensation	Number			10,815			4,386			15,201
Male	Number (%)			6,495 (60.1%)			2,515 (57.3%)			9,010 (59.3%)
Female	Number (%)			4,320 (39.9%)			1,871 (42.7%)			6,191 (40.7%)
Responsibility level										
Employees with position of responsibility ¹	Number (%)	2,048 (16.0%)	1,633 (13.1%)	1,586 (13.2%)	460 (7.2%)	461 (7.4%)	396 (8.1%)	2,508 (13.1%)	2,094 (11.2%)	1,982 (11.7%)
Male	Number (%)	1,374 (67.1%)	1,150 (70.4%)	1,119 (70.6%)	307 (66.7%)	302 (65.5%)	269 (67.9%)	1,681 (67.0%)	1,452 (69.3%)	1,388 (70.0%)
Female	Number (%)	674 (32.9%)	483 (29.6%)	467 (29.4%)	153 (33.3%)	159 (34.5%)	127 (32.1%)	827 (33.0%)	642 (30.7%)	594 (30.0%)
Employee without position of responsibility	Number (%)	10,720 (84.0%)	10,786 (86.9%)	10,430 (86.8%)	5,913 (92.8%)	5,750 (92.6%)	4,478 (91.9%)	16,633 (86.9%)	16,536 (88.8%)	14,908 (88.3%)
Male	Number (%)	6,492 (60.6%)	6,485 (60.1%)	6,215 (59.6%)	3,327 (56.3%)	3,226 (56.1%)	2,546 (56.9%)	9,819 (59.0%)	9,711 (58.7%)	8,761 (58.8%)
Female	Number (%)	4,228 (39.4%)	4,301 (39.9%)	4,215 (40.4%)	2,586 (43.7%)	2,524 (43.9%)	1,932 (43.1%)	6,814 (41.0%)	6,825 (41.3%)	6,147 (41.2%)

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

Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2017	2018	2019	2017	2018	2019	2017	2018	2019
Total workforce (headcount on 31st of December)		12,768	12,419	12,016	6,373	6,211	4,874	19,141	18,630	16,890
Type of Work										
Office	Number (%)	7,147 (56.0%)	7,036 (56.7%)	7,053 (58.7%)	2,986 (46.9%)	2,928 (47.1%)	2,261 (46.4%)	10,133 (52.9%)	9,964 (53.5%)	9,314 (55.1%)
Retail	Number (%)	1,263 (9.9%)	1,203 (9.7%)	1,156 (9.6%)	1,036 (16.3%)	1,031 (16.6%)	712 (14.6%)	2,299 (12.0%)	2,234 (12.0%)	1,868 (11.1%)
Fieldwork / other	Number (%)	4,358 (34.1%)	4,180 (33.7%)	3,807 (31.7%)	2,351 (36.9%)	2,252 (36.3%)	1,901 (39.0%)	6,709 (35.1%)	6,432 (34.5%)	5,708 (33.8%)
Employees with special needs										
Employees with special needs	Number (%)	268 (2.1%)	305 (2.0%)	335 (2.8%)	29 (0.0%)	0 (0.0%)	20 (0.4%)	297 (1.6%)	305 (2.0%)	355 (2.1%)
Empl. covered by enterprise collective labor agreements (%)	Number (%)	10,276 (80.5%)	10,115 (81.4%)	9,773 (81.3%)	6,373 (100.0%)	6,211 (100.0%)	4,874 (100.0%)	16,649 (87.0%)	16,326 (87.6%)	14,646 (86.7%)
Headcount (Yearly) Average	Number	12,933	12,606	12,190	6,805	6,372	5,524	19,738	18,978	17,713
Male	Number (%)	7,980 (61.7%)	7,766 (61.6%)	7,459 (61.2%)	3,912 (61.4%)	3,629 (57.0%)	3,171 (57.4%)	11,892 (62.1%)	11,395 (60.0%)	10,630 (60.0%)
Female	Number (%)	4,953 (38.3%)	4,840 (38.4%)	4,731 (38.8%)	2,893 (45.4%)	2,743 (43.0%)	2,353 (42.6%)	7,846 (41.0%)	7,583 (40.0%)	7,083 (40.0%)

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

Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2017	2018	2019	2017	2018	2019	2017	2018	2019
Total workforce on indeterminant term contracts	Number	12,685	12,345	11,952	5,813	5,820	4,766	18,498	18,165	16,718
Employment type										
Full- time	Number (%)	11,981 (94.5%)	11,781 (95.4%)	11,533 (96.5%)	5,799 (99.8%)	5,810 (99.8%)	4,756 (99.8%)	17,780 (96.1%)	17,591 (96.8%)	16,289 (97.4%)
Part- time	Number (%)	704 (5.5%)	564 (4.6%)	419 (3.5%)	14 (0.2%)	10 (0.2%)	10 (0.2%)	718 (3.9%)	574 (3.2%)	429 (2.6%)
Gender										
Male	Number (%)	7,816 (61.6%)	7,600 (61.6%)	7,300 (61.1%)	3,336 (57.4%)	3,343 (57.4%)	2,751 (57.7%)	11,152 (58.3%)	10,943 (60.2%)	10,051 (60.1%)
Female	Number (%)	4,869 (38.4%)	4,745 (38.4%)	4,652 (38.9%)	2,477 (42.6%)	2,477 (42.6%)	2,015 (42.3%)	7,346 (38.4%)	7,222 (39.8%)	6,667 (39.9%)
Responsibility level										
Employees with position of responsibility ¹	Number (%)	2,044 (16.1%)	1,630 (13.2%)	1,582 (13.2%)	449 (7.7%)	450 (7.7%)	387 (8.1%)	2,493 (13.5%)	2,080 (11.5%)	1,969 (11.8%)
Male	Number (%)	1,371 (67.1%)	1,147 (70.4%)	1,116 (70.5%)	298 (66.4%)	292 (64.9%)	261 (67.4%)	1,669 (66.9%)	1,439 (69.2%)	1,377 (69.9%)
Female	Number (%)	673 (32.9%)	483 (29.6%)	466 (29.5%)	151 (33.6%)	158 (35.1%)	126 (32.6%)	824 (33.1%)	641 (30.8%)	592 (30.1%)
Employess without position of responsibility	Number (%)	10,641 (83.9%)	10,715 (86.8%)	10,370 (86.8%)	5,364 (92.3%)	5,370 (92.3%)	4,379 (91.9%)	16,005 (86.5%)	16,085 (88.5%)	14,749 (88.2%)
Male	Number (%)	6,445 (60.6%)	6,453 (60.2%)	6,184 (59.6%)	3,038 (56.6%)	3,051 (56.8%)	2,490 (56.9%)	9,483 (59.3%)	9,504 (59.1%)	8,674 (58.8%)
Female	Number (%)	4,196 (39.4%)	4,262 (39.8%)	4,186 (40.4%)	2,326 (43.4%)	2,319 (43.2%)	1,889 (43.1%)	6,522 (40.7%)	6,581 (40.9%)	6,075 (41.2%)
Type of Work										
Office	Number (%)	7,916 (62.4%)	7,013 (56.8%)	7,033 (58.8%)	2,732 (47.0%)	2,750 (47.3%)	2,176 (45.7%)	10,648 (57.6%)	9,763 (53.7%)	9,209 (55.1%)
Retail	Number (%)	3,616 (28.5%)	1,198 (9.7%)	1,154 (9.7%)	826 (14.2%)	840 (14.4%)	697 (14.6%)	4,442 (24.0%)	2,038 (11.2%)	1,851 (11.1%)
Fieldwork / other	Number (%)	1,153 (9.1%)	4,134 (33.5%)	3,765 (31.5%)	2,255 (38.8%)	2,230 (38.3%)	1,893 (39.7%)	3,408 (18.4%)	6,364 (35.0%)	5,658 (33.8%)
Total workforce on full- time indeterminant term contracts	Number	11,981	11,781	11,533	5,799	5,810	4,756	17,780	17,591	16,289
Gender										
Male	Number (%)	7,637 (63.7%)	7,477 (63.5%)	7,224 (62.6%)	3,333 (57.5%)	3,342 (57.5%)	2,747 (57.8%)	10,970 (61.7%)	10,819 (61.5%)	9,971 (61.2%)
Female	Number (%)	4,344 (36.3%)	4,304 (36.5%)	4,309 (37.4%)	2,466 (42.5%)	2,468 (42.5%)	2,009 (42.2%)	6,810 (38.3%)	6,772 (38.5%)	6,318 (38.8%)
Total workforce on part-time indeterminant term contracts	Number	704	564	418	14	10	10	718	574	428
Gender										
Male	Number (%)	179 (25.4%)	123 (21.8%)	76 (18.2%)	3 (21.4%)	1 (10.0%)	4 (40.0%)	182 (25.3%)	124 (21.6%)	80 (18.7%)
Female	Number (%)	525 (74.6%)	441 (78.2%)	342 (81.8%)	11 (78.6%)	9 (90.0%)	6 (60.0%)	536 (74.7%)	450 (78.4%)	348 (81.3%)

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Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2017	2018	2019	2017	2018	2019	2017	2018	2019
Recruitment	Number	430	175	166	936	792	211	1,366	967	377
Gender										
Male	Number (%)	232 (54.0%)	110 (62.9%)	117 (70.5%)	457 (48.8%)	398 (50.3%)	99 (46.9%)	689 (50.4%)	508 (52.5%)	216 (57.3%)
Female	Number (%)	198 (46.0%)	65 (37.1%)	49 (29.5%)	479 (51.2%)	394 (49.7%)	112 (53.1%)	677 (49.6%)	459 (47.5%)	161 (42.7%)
Age										
Under 30 years	Number (%)	99 (23.0%)	70 (40.0%)	60 (36.1%)	525 (56.1%)	491 (62.0%)	119 (56.4%)	624 (45.7%)	561 (58.0%)	179 (47.5%)
Between 31 and 50 years	Number (%)	320 (74.4%)	104 (59.4%)	95 (57.2%)	397 (42.4%)	290 (36.6%)	88 (41.7%)	717 (52.5%)	394 (40.7%)	183 (48.5%)
Over 51 years	Number (%)	11 (2.6%)	1 (0.6%)	11 (6.6%)	14 (1.5%)	11 (1.4%)	4 (1.9%)	25 (1.8%)	12 (1.2%)	15 (4.0%)
Recruitment within OTE Group										
Recruitment within OTE Group	Number (%)	51 (11.9%)	10 (5.7%)	12 (7.2%)	126 (13.5%)	131 (16.5%)	16 (7.6%)	177 (13.0%)	141 (14.6%)	28 (7.4%)
Departures	Number	394	505	580	1,586	954	1,543	1,980	1,459	2,123
Gender										
Male	Number (%)	247 (62.7%)	340 (67.3%)	411 (70.9%)	890 (56.1%)	505 (52.9%)	808 (52.4%)	1,137 (57.4%)	845 (57.9%)	1,219 (57.4%)
Female	Number (%)	147 (37.3%)	165 (32.7%)	169 (29.1%)	696 (43.9%)	449 (47.1%)	735 (47.6%)	843 (42.6%)	614 (42.1%)	904 (42.6%)
Age										
Under 30 years	Number (%)	36 (9.1%)	46 (9.1%)	30 (5.2%)	522 (32.9%)	473 (49.6%)	476 (30.8%)	558 (28.2%)	519 (35.6%)	506 (23.8%)
Between 31 and 50 years	Number (%)	211 (53.6%)	239 (47.3%)	249 (42.9%)	758 (47.8%)	429 (45.0%)	831 (53.9%)	969 (48.9%)	668 (45.8%)	1,080 (50.9%)
Over 51 years	Number (%)	147 (37.3%)	220 (43.6%)	301 (51.9%)	306 (19.3%)	52 (5.5%)	236 (15.3%)	453 (22.9%)	272 (18.6%)	537 (25.3%)
Voluntary Exit Programs										
Departures in the context of voluntary exit programs	Number (%)	201 (51.0%)	282 (55.8%)	321 (55.3%)	601 (38.0%)	743 (77.9%)	571 (37.0%)	802 (40.5%)	1,025 (70.3%)	892 (42.0%)
Type of Departure										
Voluntary turnover	Percentage %			4.4%			23.7%	/ (0.0%)	/ (0.0%)	10.4%
Involuntary turnover	Percentage %			0.3%			4.2%	/ (0.0%)	/ (0.0%)	1.5%

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Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2017	2018	2019	2017	2018	2019	2017	2018	2019
Total workforce on fixed-term contracts	Number	83	74	64	560	391	108	643	465	172
Gender										
Male	Number (%)	50 (60.2%)	35 (47.3%)	34 (53.1%)	298 (53.2%)	185 (47.3%)	64 (59.3%)	348 (54.1%)	220 (47.3%)	98 (57.0%)
Female	Number (%)	33 (39.8%)	39 (52.7%)	30 (46.9%)	262 (46.8%)	206 (52.7%)	44 (40.7%)	295 (45.9%)	245 (52.7%)	74 (43.0%)

Members of the Board of Directors	Number	9	10	10				9	10	10
Gender										
Male	Number (%)	9 (100.0%)	8 (80.0%)	9 (90.0%)				9 / (100.0%)	8 (80.0%)	9 (90.0%)
Female	Number (%)	0	2 (20.0%)	1 (10.0%)				0	2 (20.0%)	1 (10.0%)
Age										
Under 30 years	Number (%)	0	0	0				0	0	0
Between 31 and 50 years	Number (%)	4 (44.4%)	5 (50.0%)	4 (40.0%)				4 (44.4%)	5 (50.0%)	4 (40.0%)
Over 51 years	Number (%)	5 (55.6%)	5 (50.0%)	6 (60.0%)				5 (55.6%)	5 (50.0%)	6 (60.0%)
Members of OTE Group Management Team	Number	10	15	15				10	15	15
Gender										
Male	Number (%)	7 (70.0%)	12 (80.0%)	12 (80.0%)				7 (70.0%)	12 (80.0%)	12 (80.0%)
Female	Number (%)	3 (30.0%)	3 (20.0%)	3 (20.0%)				3 (30.0%)	3 (20.0%)	3 (20.0%)
Age										
Under 30 years	Number (%)	0	0	0				0	0	0
Between 31 and 50 years	Number (%)	4 (40.0%)	7 (46.7%)	4 (26.7%)				4 (40.0%)	7 (46.7%)	4 (26.7%)
Over 51 years	Number (%)	6 (60.0%)	8 (53.3%)	11 (73.3%)				6 (60.0%)	8 (53.3%)	11 (73.3%)

Health and Safety Issues										
Fatalities (number of employees)	Number	0	0	1	1	0	1	1	0	2
Number of employees injured	Number	80	93	114	7	10	11	87	103	125
Male	Number (%)	51 (63.8%)	64 (68.8%)	83 (72.8%)	6 (85.7%)	6 (60.0%)	6 (54.5%)	57 (65.5%)	70 (68.0%)	89 (71.2%)
Female	Number (%)	29 (36.3%)	29 (31.2%)	31 (27.2%)	1 (14.3%)	4 (40.0%)	5 (45.5%)	30 (34.5%)	33 (32.0%)	36 (28.8%)

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Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2017	2018	2019	2017	2018	2019	2017	2018	2019
Injury rate¹	Number	0.66	0.79	1.01	0.12	0.16	0.23	0.49	0.57	0.77
	Male Number	0.69	0.88	1.20	0.17	0.17	0.21	0.52	0.64	0.92
	Female Number	0.62	0.65	0.70	0.04	0.15	0.24	0.43	0.46	0.55
Occupational disease rate²	Number	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Male Number	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Female Number	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lost day rate³	Number	20.31	24.17	29.26	3.43	8.99	13.62	14.84	18.84	24.55
	Male Number	22.95	28.82	37.11	5.02	12.20	18.90	17.23	23.31	31.85
	Female Number	16.09	16.55	17.05	1.04	4.73	6.50	11.09	12.05	13.69
Absentee rate⁴	Number	671.56	767.93	761.85	617.99	381.33	419.75	655.07	639.16	664.19
Hours of psychological support consulting services	Hours	2,055	1,921	1,522	0	0	0	2,055	1,921	1,522
Training on Health and Safety issues	Hours	6,801	22,887	17,723	89,760	60,372	66,536	96,561	83,259	84,259
Training on Health and Safety issues	Hours per employee	0.53	1.82	1.45	13.19	9.47	12.05	4.89	4.39	4.76

Employee training										
Total participations	Number	7,905	9,314	13,765	23,419	17,378	18,579	31,324	26,692	32,344
Gender										
Male	Number (%)	5,471 (69.2%)	6,050 (65.0%)	7,445 (54.1%)	13,583 (58.0%)	9,146 (52.6%)	9,998 (53.8%)	19,054 (60.8%)	15,196 (56.9%)	17,443 (53.9%)
Female	Number (%)	2,434 (30.8%)	3,264 (35.0%)	6,320 (45.9%)	9,836 (42.0%)	8,232 (47.4%)	8,581 (46.2%)	12,270 (39.2%)	11,496 (43.1%)	14,901 (46.1%)
Responsibility level										
Employees with position of responsibility ¹	Number (%)	2,280 (28.8%)	2,533 (27.2%)	2,504 (18.2%)		789 (4.5%)	1,280 (6.9%)		3,322 (12.4%)	3,784 (11.7%)
Employees without position of responsibility	Number (%)	5,200 (65.8%)	6,781 (72.8%)	11,261 (81.8%)		16,589 (95.5%)	17,299 (93.1%)		23,370 (87.6%)	28,560 (88.3%)
Type of Work										
Office	Number (%)	5,011 (63.4%)	6,231 (66.9%)	10,683 (77.6%)		2,237 (12.9%)	7,394 (39.8%)		8,468 (31.7%)	18,077 (55.9%)
Retail	Number (%)	262 (3.3%)	62 (0.7%)	2,542 (18.5%)		5,318 (30.6%)	5,097 (27.4%)		5,380 (20.2%)	7,639 (23.6%)
Fieldwork / other	Number (%)	2,632 (33.3%)	3,021 (32.4%)	541 (3.9%)		9,823 (56.5%)	6,088 (32.8%)		12,844 (48.1%)	6,629 (20.5%)

1. Injury rate = (Total number of injuries / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees. The data do not include minor (first-aid level) injuries.
2. Occupational diseases rate = (Total number of occupational diseases cases / Total number of hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees.
3. Lost day rate = (Total number of lost calendar days / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks 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.
4. Absentee rate = (Total number of missed absentee days / Total number of workforce days worked) x 25,000. The factor 25,000 is derived from 50 working weeks of 5 days per 100 employees. This rate is not monitored per gender.

Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2017	2018	2019	2017	2018	2019	2017	2018	2019
Total employees who participated in training	Number (%)	5,285 (41.3%)	5,869 (46.6%)	6,886 (56.5%)	6,805 (107.0%)	6,275 (98.5%)	5,524 (100.0%)	12,090 (63.2%)	12,144 (64.0%)	12,410 (70.1%)
Gender										
Male	Number (%)	3,709 (70.2%)	4,068 (69.3%)	4,104 (59.6%)	3,912 (57.5%)	3,564 (56.8%)	3,171 (57.4%)	7,621 (63.0%)	7,632 (62.8%)	7,275 (58.6%)
Female	Number (%)	1,576 (29.8%)	1,801 (30.7%)	2,782 (40.4%)	2,893 (42.5%)	2,711 (43.2%)	2,353 (42.6%)	4,469 (37.0%)	4,512 (37.2%)	5,135 (41.4%)
Total training hours	Number	117,502	127,086	153,271	224,376	142,745	47,911	341,878	269,831	201,182
Gender (hours)										
Male	Hours (%)	83,589 (71.1%)	88,267 (69.5%)	107,377 (70.1%)	130,138 (58.0%)	102,236 (71.6%)	23,060 (48.1%)	213,727 (62.5%)	190,503 (70.6%)	130,437 (64.8%)
Female	Hours (%)	33,913 (28.9%)	38,819 (30.5%)	45,894 (29.9%)	94,238 (42.0%)	40,509 (28.4%)	24,851 (51.9%)	128,151 (37.5%)	79,328 (29.4%)	70,745 (35.2%)
Type of work (hours)										
Office	Hours (%)	74,064 (63.0%)	84,925 (66.8%)	115,953 (75.7%)		4,541 (3.2%)	16,830 (35.1%)		89,466 (33.2%)	132,783 (66.0%)
Retail	Hours (%)	4,203 (3.6%)	1,475 (1.2%)	32,117 (21.0%)		40,165 (28.1%)	19,321 (40.3%)		41,640 (15.4%)	51,438 (25.6%)
Fieldwork / other	Hours (%)	39,235 (33.4%)	40,686 (32.0%)	5,201 (3.4%)		98,039 (68.7%)	11,761 (24.5%)		138,725 (51.4%)	16,962 (8.4%)
Training hours average (on the basis of headcount avg)	Hours per employee	9.09	10.08	12.57	32.97	22.40	8.67	17.32	14.22	11.36
Training per employee by gender (on the basis of HC avg)										
Male	Hours per employee	10.48	11.37	14.40	33.27	28.17	7.27	17.97	16.72	12.27
Female	Hours per employee	6.85	8.02	9.70	32.57	14.77	10.56	16.33	10.46	9.99
Training per empl by type of work (on the basis of HC on 31/12)										
Office	Hours per employee	10.36	12.07	16.44		1.55	7.44		13.62	23.88
Retail	Hours per employee	3.33	1.23	27.78		38.96	27.14		40.18	54.92
Fieldwork / other	Hours per employee	9.00	9.73	1.37		43.53	6.19		53.27	7.55
Total training hours by employee seniority										
Avg. training hrs for employees incl. in the top 10% of empl. by total compensation	Hours per employee			20.92			9.82			17.71
Avg. training hrs for employees incl. in the bottom 90% of empl. by total compensation	Hours per employee			11.60			9.83			11.09
Total employee training expenditure	Euros (€)			4,341,210						4,341,210

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Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2017	2018	2019	2017	2018	2019	2017	2018	2019
Other data										
Internships										
University & tech. school students who carried out their internship at OTE Group	Number	553	578	606	33	44	79	586	622	685
Parental leave										
Employees who made use of parental leave for childcare	Number	605	562	552	156	167	138	761	729	690
Male	Number	233	282	315	10	19	21	243	301	336
Female	Number	372	280	237	146	148	117	518	428	354
Employees who made use of parental leave without pay	Number	31	52	154	3	5	6	34	57	160
Male	Number	1	4	2	0	1	0	1	5	2
Female	Number	30	48	152	3	4	6	33	52	158
Empl. who made use of par. leave for child upbringing at 1/3 pay	Number	4	3	1	0	0	0	4	3	1
Male	Number	0	0	0	0	0	0	0	0	0
Female	Number	4	3	1	0	0	0	4	3	1
Empl. who returned to work after the use of parental leave	Number	19	286	445	101	159	170	120	445	615
Male	Number	0	78	280	4	17	22	4	95	302
Female	Number	19	208	165	97	142	148	116	350	313

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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 are placed or hybrid systems are installed, to reduce the operating hours of the generators, or old units are replaced with new, more advanced ones that operate at lower noise levels
- In order to reduce noise levels from ventilation and/or cooling systems to the levels foreseen by legislation, soundproofing constructions are placed, or old units are replaced with new, more advanced ones that operate at lower noise levels

VISUAL IMPACT

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

- The size of new Base Stations being built now has been decreased
- Efforts are made to collocate Base Stations in common installations with the other telephony companies so as to reduce all potential impacts, including overall visual impact of mobile Base Stations (4 collocation cases in Greece; 32 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 (52 special constructions in Greece)
- Appropriate modifications are also applied to existing telecommunication infrastructure (1 special construction in Greece)

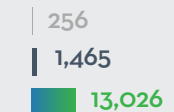
Direct Non-GHG Emissions (Relevant for GRI Standard 305-7)

- Emissions of typical air pollutants (NO_x, SO₂, PM₁₀ 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

NO_x



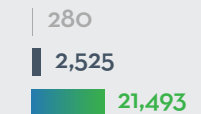
PM₁₀



SO₂



VOC



Emissions (in kg) ■ Space heating ■ Electricity generators ■ Vehicles

OTE Group Environmental Performance Data - Waste

OTE WASTE		GREECE			ROMANIA			OTE GROUP		
Category	Materials / Waste streams ¹	2017	2018	2019	2017	2018	2019	2017	2018	2019
Materials / Resources consumption										
	Water (m³)	216,773	223,986	174,501	83,468	73,661	53,142	300,241	297,647	227,643
	Paper	241,655	188,226	164,189	150,486	158,513	157,055	392,141	346,738	321,244
	Packaging materials	247,878	750,733	208,210	216,595	47,353	27,210	464,473	798,086	235,420
Hazardous		921,381	994,339	1,629,397	213,656	188,025	201,812	1,135,038	1,182,363	1,831,209
	Technical - Hazardous									
	Lead batteries	640,685	574,088	793,272	94,577	117,230	20,065	735,262	691,318	813,337
	Various ²	274,895	411,135	827,950	117,880	70,600	181,531	392,775	481,735	1,009,481
	Non technical - Hazardous									
	Lubricants	5,477	6,965	6,368	1,199	195	216	6,676	7,160	6,584
	Refrigerants and various chemicals	324	2,150	1,807	N/A	N/A	N/A	324	2,150	1,807
Technical		2,014,938	2,182,697	2,376,322	1,006,021	1,464,870	1,716,460	3,020,960	3,647,567	4,092,782
	Telecom network									
	Metals	1,245,372	1,369,307	966,066	133,641	97,202	84,262	1,379,013	1,466,509	1,050,328
	Cables	528,202	542,171	1,147,123	556,859	843,014	1,103,502	1,085,061	1,385,185	2,250,625
	WEEE ³	190,678	154,346	162,271	315,421	513,092	497,561	506,099	667,439	659,832
	Shops									
	Phones and accessories	20,652	42,653	35,001	32	611	185	20,684	43,264	35,186
	Home batteries	30,034	26,427	29,571	69	0	0	30,103	26,427	29,571
	Obsolete merchandise ⁴	0	47,793	36,291	N/A	10,952	30,950	0	58,745	67,241
Paper		415,053	330,605	293,746	150,486	158,513	157,055	565,539	489,118	450,801
	Solid waste disposal sites	332,822	151,713	160,617	63,847	146,256	129,142	396,669	297,969	289,759
	Recycling	82,231	178,892	133,129	86,639	12,257	27,913	168,870	191,149	161,042

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OTE WASTE		GREECE			ROMANIA			OTE GROUP		
Category	Materials / Waste streams ⁴	2017	2018	2019	2017	2018	2019	2017	2018	2019
Residual		679,365	1,203,595	621,393	1,868,415	1,453,264	1,432,161	2,547,780	2,656,859	2,053,553
	Packaging materials									
	Offices	6,111	7,718	7,431	38,707	2,619	1,886	44,818	10,337	9,317
	Warehouses	239,825	316,460	202,250	86,942	89,704	142,609	326,767	406,164	344,859
	Municipal Solid Waste⁵									
	Offices	221,882	219,884	204,146	1,742,101	1,360,046	1,286,427	1,963,983	1,579,930	1,490,573
	Warehouses	207,285	655,333	204,960				207,285	655,333	204,960
	Ink-cartridges									
	Offices ⁶	3,361	2,827	1,622	665	895	1,238	4,026	3,722	2,860
	Customers (take-back)	902	1,373	984	N/A	N/A	N/A	902	1,373	984
Other		493,580	16,893	66,237	699	0	0	494,278	16,893	66,237
	End of life vehicles	476,935	1,090	66,237	N/A	N/A	N/A	476,935	1,090	66,237
	Tires and other waste	16,645	15,803	0	699	0	0	17,343	15,803	0

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

Category	Units	GREECE ¹			ROMANIA			OTE GROUP		
		2017	2018	2019	2017	2018	2019	2017	2018	2019
Energy consumption²	GWh	532.50	556.55	554.54	271.05	262.31	279.29	803.56	818.87	833.83
Electricity										
Telecom network	GWh	395.18	419.92	418.58	172.34	173.49	194.15	567.51	593.41	612.74
Buildings ³	GWh	70.06	69.64	71.61	31.56	29.85	30.41	101.61	99.49	102.02
Stationary installations										
Heating oil	GWh	3.57	2.56	2.84	0.00	0.00	0.00	3.57	2.56	2.84
Natural gas	GWh	7.08	5.51	5.00	20.81	16.20	14.79	27.89	21.70	19.79
District heating	GWh	0.42	0.34	0.38	7.38	7.75	8.55	7.80	8.09	8.92
Liquid fuels for electricity generators ⁴	GWh	15.70	17.82	17.29	0.75	0.66	0.97	16.45	18.48	18.26
Road transportation										
Unleaded gasoline	GWh	14.84	12.78	12.24	1.39	0.21	0.09	16.24	12.99	12.34
Diesel	GWh	25.66	27.98	26.59	36.82	34.16	30.33	62.48	62.15	56.92
GHG emissions⁵										
Direct emissions										
Space heating ⁶	t CO ₂ eq	2,391	1,802	1,775	4,215	3,280	2,996	6,607	5,083	4,771
Electricity generators ⁶	t CO ₂ eq	4,213	4,782	4,639	201	175	259	4,413	4,957	4,898
Vehicles ⁶	t CO ₂ eq	10,205	10,274	9,788	9,786	8,813	7,801	19,991	19,087	17,589
HFCs - AC systems ⁷	t CO ₂ eq	12,245	12,412	10,401	4,214	3,710	2,297	16,459	16,122	12,699
Indirect (scope 2) emissions, location-based⁸										
Telecom network	t CO ₂ eq	231,664	219,214	223,239	58,884	55,863	66,754	290,548	275,078	289,993
Buildings	t CO ₂ eq	41,162	36,429	38,273	12,396	11,306	12,276	53,558	47,735	50,549
Indirect (scope 2) emissions, market-based	t CO ₂ eq	86,199	5,867	2,358	81,337	88,315	92,229	167,535	94,182	94,587

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OTE Group Environmental Performance Data - Energy

Category	Units	GREECE ¹			ROMANIA			OTE GROUP			
		2017	2018	2019	2017	2018	2019	2017	2018	2019	
Transport											
Service vehicles											
Unleaded gasoline vehicles	#	921	716	734	60	18	15	981	734	749	
Diesel vehicles	#	1,949	2,093	2,059	2,573	2,632	2,526	4,522	4,725	4,585	
Distance covered	km	38,758,962	39,789,152	38,442,221	50,468,295	48,411,624	43,218,681	89,227,257	88,200,776	81,660,902	
Company vehicles											
Unleaded gasoline vehicles	#	219	206	104	31	11	12	250	217	116	
Diesel vehicles	#	179	162	180	287	251	192	466	413	372	
Distance covered	km	8,116,042	7,150,740	6,880,479	4,983,467	4,237,439	2,659,648	13,099,509	11,388,179	9,540,127	

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 CO₂, CH₄, N₂O 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 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, CO₂ emissions are estimated on the basis of the emission factors developed by the International Energy Agency. The non-CO₂ (i.e. CH₄ and N₂O) 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	Telecom network	Greece, Romania	420 systems were installed by the end of 2019 (COSMOTE) Smart metering systems are already installed in 32 locations (Romania)
Free cooling systems	Telecom network	Greece	The total number of free cooling systems already installed is 2,050 (COSMOTE)
Replacement of old equipment	Telecom network	Greece	In 2019, OTE and COSMOTE replaced 18 and 105 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	Telecom network	Greece	The installation of these systems aims to reduce energy consumption through the increase of internal temperature of Base Station (set point from 26oC to 30oC). Up to now, 245 systems have been already installed (COSMOTE)
Modernization of fixed telecom network	Telecom network	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.
Rational use of buildings and space consolidation	Telecom network - Buildings	Greece	Consolidation (geographical and spatial) of the hardware necessary for network management In 2019, the building area used by OTE remained at 2018 levels
Maintenance of electricity generators	Telecom network	Greece	A maintenance program covering more than 2000 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	Buildings / Stores	Greece	Renovation activities are carried out in important buildings and shops. Some indicative measures with positive energy impact are the following: <ul style="list-style-type: none"> • Buildings envelope energy upgrade • Modernization of HAVC systems improving energy efficiency • Energy Design of Constructural Works in buildings and selection of highly efficient E/M Equipment • LED lighting systems in renovated buildings • Smart metering and automation in lighting, air-conditioning, generators and other systems for better supervision and improvement of operational efficiency
Energy retrofit of Data Centers	Data Centers	Greece	Energy conservation measures aiming to improve the power usage effectiveness coefficient
Fleet renewal	Road transport	Greece	A Vehicle Tender, started at the end of 2018 and fully completed in 2019, concerning the replacement of 314 leasing service (gasoline and diesel) vehicles with equal number of low emission and improved energy efficiency new ones (OTE 274, COSMOTE 36, GERMANOS 1, COSMOTE-EVALUE 3)
Teleconferences	Mobility	Greece	In 2019, 9,724 audio-conferences were held

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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 report 2019 titled “OTE Group 2019 Integrated Report” (further referred to as the “Report”) for the reporting period 1 January 2019 - 31 December 2019.

Scope of our assurance engagement

Our engagement was designed to provide limited assurance in accordance with ISAE 3000¹ and the requirements for a Type 2 assurance engagement under AA1000AS (2008)² 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)³ 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 Global Reporting Initiative (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 2019 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 2019 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.

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

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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 CO₂ 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 implementing a materiality analysis for this year, aiming to maximize the capacity to engage of the involved stakeholder groups.
- In relation to the principle of materiality, OTE Group should maintain the current procedures that are characterized by the frequent implementation of a materiality analysis which incorporates Enterprise Risk Management principles.
- In relation to the principle of responsiveness, OTE Group could further invest on the climate change responsiveness area by implementing the already planned initiative of conducting a climate change impact assessment across its entire business.
- 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 taking into account the valuable feedback/ results of the climate change impact assessment initiative mentioned above.



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ABOUT THIS REPORT



OTE GROUP



FINANCIALS



RESPONSIBLE BUSINESS



EMPLOYEES



CUSTOMERS



SOCIETY



CLIMATE & ENVIRONMENT



GOVERNANCE



APPENDIX

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 1⁴ 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 12th, 2020



1. International Standard on Assurance Engagements (ISAE) 3000: Assurance Engagements other than Audits or reviews of Historical Financial Information, issued by the International Auditing and Accounting Standards Board.
2. AA1000 Assurance Standard (AA1000AS, 2008) with 2018 Addendum, issued by AccountAbility.
3. AA1000 Accountability Principles (2018), issued by AccountAbility.
4. 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.



GROUP OF COMPANIES

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