

# **Sustainability Report 2016**

## **Appendix**

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## 2016 Performance

2016 Goals	2016 Performance	
<b>Sustainability</b>		
<b>OTE-COSMOTE:</b> Maintain the participation in International Sustainable Development Indicators (SRI)	F	See <a href="#">Memberships, Ratings and Awards</a>
<b>OTE-COSMOTE:</b> Further improvement of the communication of the on-line version of the Corporate Sustainability Report.	F	OTE Group Sustainability Report 2015, was presented through an innovative and interactive way through the website <a href="http://www.otegroupsustainability2016.gr">www.otegroupsustainability2016.gr</a> . In addition, stakeholders can have an easy and faster access on the website, in order to get further informed about the strategy and performance of the OTE Group on Sustainability issues for 2016.
<b>OTE-COSMOTE:</b> Association of the Group's Corporate Strategy with the Sustainable Development Goals of the United Nations	F	See <a href="#">Contribution to Achieving the Sustainable Development Goals of the United Nations</a> .
<b>OTE-COSMOTE:</b> Participation in the Advanced CoP of the Global Compact	F	See <a href="#">United Nations Global Compact – Communication on Progress (CoP)</a> .
<b>Responsible Business</b>		
<b>OTE-COSMOTE:</b> Attestation of the Enterprise Risk Management System in accordance with the standard ISO 31000 – Principles and Guidelines	F	Full achievement of the target, the scope of which was expanded with the certification in 2016 of two subsidiaries in Romania, Telekom Romania and Telekom Romania Mobile.
<b>OTE-COSMOTE:</b> Enhancement of risk culture through training and information initiatives for all business units	IP	Actions for the enhancement of risk culture, through training and information initiatives for all business units, are implemented throughout the Group with a two-year horizon.
<b>OTE-COSMOTE:</b> GAP Analysis of the existing Compliance Management System (CMS) in accordance with the ISO 19600 Guidelines	N	Instead, it was considered appropriate, that the Compliance System be certified in accordance with the requirements of IDW Assurance Standard 980 "Principles for the Proper Performance of Reasonable Assurance Engagements Relating to Compliance Management Systems",.
<b>OTE-COSMOTE:</b> Updating corporate risks and Implementation of Business Continuity program.	IP	The goal of updating corporate risks has been partially achieved (relevant studies and actions will be ongoing in 2017). The goal of Business Continuity program optimization has been fully achieved and is part of the constant objectives of Business Continuity (and for 2017).
<b>OTE-COSMOTE:</b> Extension of a system for the logging of actions and Database Activity Monitoring with the addition of a system to deter website attacks.	F	See <a href="#">Security and Data Privacy</a>
<b>OTE-COSMOTE:</b> Extension of the ISO27001certification of the Information Security System	F	See <a href="#">Security and Data Privacy</a>
<b>OTE:</b> Installation of access control system in at least 4,000 outdoor line distribution cabinets (KV) and cabins	IP	See <a href="#">Security and Data Privacy</a>
<b>OTE-COSMOTE:</b> Extending security services to other companies	F	See <a href="#">Security and Data Privacy</a>
<b>OTE-COSMOTE:</b> Implementation of encryption in corporate electronic communications	IP	The implementation of the project is in progress.
<b>OTE:</b> Application of solution against piracy for COSMOTE TV	F	See <a href="#">Security and Data Privacy</a>
<b>OTE-COSMOTE:</b> Setting up of system for information security compliance monitoring	IP	The installation of the system is in progress. The commission has been completed.
<b>OTE-COSMOTE:</b> Strengthening of physical security measures (structural interventions / security systems) in 23 stores	F	See <a href="#">Security and Data Privacy</a>
<b>OTE-COSMOTE:</b> Strengthening of physical security measures (structural interventions / security systems) in 25 buildings	Π	See <a href="#">Security and Data Privacy</a>

2016 Goals	2016 Performance	
<b>OTE:</b> Installation of a new management system and a new access control system in 50 outdoor line distribution cabinets (KV) and cabins	F	See <a href="#">Security and Data Privacy</a>
<b>COSMOTE:</b> Installation of Video Verification solution in 25 Base Stations to provide the corresponding service from external ARC	IP	See <a href="#">Security and Data Privacy</a>
<b>OTE-COSMOTE:</b> Developing initiatives in order to promote responsible and safe use of mobile phones, while driving	F	See <a href="#">Safe and Responsible Technology Use</a>
<b>OTE-COSMOTE:</b> Consolidation of OTE and COSMOTE Supplier Code of Conducts	IP	It is in progress
<b>OTE-COSMOTE:</b> Integration in supplier contracts of the requirement to comply with the Social Charter of the OTE Group	IP	It is in progress
<b>OTE-COSMOTE:</b> Evaluation of OTE and COSMOTE suppliers representing 80% and 90% of the annual supply volume respectively	P	See <a href="#">Responsible Procurement and Supply Chain Management</a>
<b>OTE-COSMOTE:</b> Assurance that 100% of Suppliers with contracts above € 50,000 are checked for integrity	F	See <a href="#">Responsible Procurement and Supply Chain Management</a>
<b>Better World for All</b>		
<b>COSMOTE:</b> Continue the contribution to the humanitarian crisis, due to the refugee flows	F	See <a href="#">Social Contribution</a>
<b>OTE-COSMOTE:</b> New initiative for the education of children to improve technological skills	F	See <a href="#">Social Contribution</a>
<b>OTE-COSMOTE:</b> Strengthening supportive actions related to the improvement of child care conditions in hospitals	F	See <a href="#">Social Contribution</a>
<b>OTE-COSMOTE:</b> Strengthening corporate voluntary activities	IP	See <a href="#">Social Contribution</a>
<b>Responsible Employment and Development</b>		
<b>OTE-COSMOTE:</b> One HR: harmonization, simplification and digitization of HR processes	IP	See <a href="#">Approach (Responsible Employment and Development)</a>
<b>OTE-COSMOTE:</b> Talent management and development	F	See <a href="#">Employee Selection, Attracting and Retaining Talented Employees</a>
<b>OTE-COSMOTE:</b> Leadership Skills Enhancement for all hierarchical levels	IP	See <a href="#">Employee Training and Skills Development</a>
<b>OTE-COSMOTE:</b> Design of Job Families Model	IP	See <a href="#">Approach (Responsible Employment and Development)</a> The project is expected to be completed by 2017. This includes the detailed description of the Job Families Model, the identification of the desirable capabilities and attributes for each role in Job families and the internal communication of the Model
<b>OTE-COSMOTE:</b> Strengthening of interdepartmental mobility (Job Rotation) of workers with a view to their professional development	IP	In 2016, a Job Rotation program, aiming at the professional development of employees, was launched.
<b>OTE-COSMOTE:</b> Digitizing of basic Health and Safety activities	F	See <a href="#">Health and Safety</a>

2016 Goals	2016 Performance	
<b>Sustainable Environment for All</b>		
<b>OTE-COSMOTE:</b> Contribution to the achievement of the CO <sub>2</sub> emissions reduction target set for 2020 at DT Group level, by planning and implementing measures for energy conservation and CO <sub>2</sub> emissions reduction.	F	See <a href="#">Energy and Climate Change Environmental Performance Data – Energy</a>
<b>OTE:</b> Reduction of CO <sub>2</sub> emissions (scope 1 and scope 2) by 19% compared to 2008 levels.	N	See <a href="#">Energy and Climate Change</a> CO <sub>2</sub> emissions (scope 1 and scope 2) in 2016 were around 10% lower than emissions in 2008
<b>COSMOTE:</b> Restriction of the increase of CO <sub>2</sub> emissions (scope 1 and scope 2) to 6% compared to 2008.	F	See <a href="#">Energy and Climate Change</a> CO <sub>2</sub> emissions increase (scope 1 and scope 2) was at 5.7% compared to 2008
<b>OTE-COSMOTE:</b> Certification of Energy Management System according to the provisions of the ISO 50001: 2011.	F	See <a href="#">Approach (Sustainable Environment for All)</a>
<b>OTE:</b> Reduction of electricity consumption in the telecom network by 1.5% compared to 2015.	N	See <a href="#">Energy and Climate Change</a>
<b>COSMOTE:</b> Restriction of the increase of electricity consumption in the telecom network at 3% compared to 2015.	N	See <a href="#">Energy and Climate Change</a>
<b>OTE:</b> Energy performance of service vehicles at about 8 lt/100 km (gasoline) and at 10 lt/100 km (diesel).	P	The specific energy consumption of diesel service vehicles was estimated at about 9 lt/100 km. The goal for gasoline service vehicles was not achieved as there was an extensive use of aged vehicles for urban transportation.
<b>COSMOTE:</b> Improvement of energy performance of vehicles fleet by 5%.	F	The average efficiency of the vehicle fleet improved by 11%.
<b>OTE-COSMOTE:</b> Expansion of the integrated recycling program for packaging materials in 2 additional buildings.	F	See <a href="#">Circular Economy</a>
<b>OTE-COSMOTE:</b> Recycling of 100% of hazardous and technical waste withdrawn.	F	See <a href="#">Circular Economy</a>
<b>COSMOTE:</b> Installation of 9 additional measurement stations.	M	The 9 measurement stations were available but only 4 were not registered in the “Pedion24” program due to software changes (by the universities) because of metering equipment upgrades.

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

## Accountability Principles Standard AA1000 Index

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

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

Adhering to the 10 Principles of the UN Global Compact by the enterprises is of critical importance for the protection of human rights and society's needs, during these challenging times. With these Principles as a guide and through technology and innovation, OTE Group, the largest telecoms investor in the country, has as a vision to create a better world for all.

Since 2008, both OTE and COSMOTE 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 2016 Sustainability Report includes a detailed presentation of the Companies' priorities, activities, goals and outcomes, responding to all 21 criteria of Advanced CoP.



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

We welcome feedback on its contents.

Michael Tsamaz

Chairman and CEO of OTE Group

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

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



## Greek Sustainability Code – Declaration of Conformity

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

### The 20 criteria of the Greek Sustainability Code: Actions recorded in 2016 Sustainability Report

Theme	Criteria	Report location
<b>Strategy</b>	1. Strategic analysis and action	<a href="#">Sustainability Strategy</a>
	2. Materiality	<a href="#">Materiality Analysis</a>
	3. Objectives	<a href="#">2016 Performance and 2017 Targets</a> <a href="#">2016 Performance</a>
	4. Value chain management	<a href="#">Responsible Procurement and Supply Chain Management</a>
<b>Process Management</b>	5. Responsibility	<a href="#">Sustainability Governance</a>
	6. Rules and procedures	<a href="#">Policies and Management of Enterprise Risk and Compliance</a> <a href="#">Integrated Management System</a>
	7. Monitoring	<a href="#">Sustainability Governance</a> <a href="#">Corporate Responsibility Performance 2016</a> <a href="#">Integrated Management System</a> <a href="#">Independent Assurance Report</a>
	8. Rewarding schemes and motives for sustainable development	<a href="#">Sustainability Governance</a> <a href="#">Employee Selection, Attracting and Retaining Talented Employees</a>
	9. Stakeholders engagement	<a href="#">Stakeholders</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a>
	10. Responsible products and innovation	<a href="#">Products and Services for Sustainability</a> <a href="#">Research and Innovation</a> <a href="#">Energy and Climate Change</a>

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

## Global Reporting Initiative Content Index

The OTE Group Sustainability Report 2016 is “in accordance” with the GRI G4 Guidelines at “core” level.

### General Standard Disclosures

General Standard Disclosures	Report location / Notes	External Assurance	Index summary description
<b>Strategy and Analysis</b>			
G4-1	<a href="#">Message from the Chairman and CEO</a>	☑	Statement from the most senior decision-maker of the organization
<b>Organizational Profile</b>			
G4-3	<a href="#">Report Profile</a>	☑	Name of organization
G4-4	<a href="#">Greece</a>	☑	Brands, products, and services
G4-5	<a href="#">Report Profile</a>	☑	Headquarters location
G4-6	<a href="#">Group General Presentation</a>	☑	Countries of operation
G4-7	<a href="#">Group General Presentation Greece</a>	☑	Ownership and legal form
G4-8	<a href="#">Group General Presentation Connectivity for All</a>	☑	Markets served
G4-9	<a href="#">Group General Presentation Greece Corporate Responsibility Performance 2016</a>	☑	Scale of the reporting organization
G4-10	<a href="#">Employment Human Resources Performance Data</a>	☑	Employees by contract, region and gender
G4-11	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>	☑	Employees covered by collective bargaining agreements
G4-12	<a href="#">Responsible Procurement and Supply Chain Management</a>	☑	Supply chain of the organization
G4-13	No significant changes in reporting period.	☑	Significant changes in reporting period

General Standard Disclosures	Report location / Notes	External Assurance	Index summary description
G4-14	<a href="#">Sustainability Strategy</a> <a href="#">Policies and Management of Enterprise Risk and Compliance</a> <a href="#">Integrated Management System</a> <a href="#">Health and Safety</a> <a href="#">Approach (Sustainable Environment for All)</a>	☑	Precautionary approach
G4-15	<a href="#">Report Profile</a> <a href="#">Memberships, Ratings and Awards</a> <a href="#">Additional Information for GRI Indicators / Memberships</a>	☑	Externally developed economic, environmental and social charters, principles, or other initiatives
G4-16	<a href="#">Memberships, Ratings and Awards</a> <a href="#">Responsible Competition</a> <a href="#">Additional Information for GRI Indicators / Memberships</a>	☑	Memberships of associations and national or international advocacy organizations
<b>Identified Material Aspects and Boundaries</b>			
G4-17	<a href="#">Report Profile</a> <a href="#">Group General Presentation</a>	☑	List all entities included in the organization's consolidated financial statements or equivalent documents
G4-18	<a href="#">Report Profile</a> <a href="#">Materiality Analysis</a>	☑	Process for defining report content and aspect boundaries
G4-19	<a href="#">Materiality Analysis</a> <a href="#">Additional Information for GRI Indicators</a>	☑	Materiality aspects
G4-20	<a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>	☑	Material aspects boundary within the organization
G4-21	<a href="#">Additional Information for GRI Indicators / Materiality Analysis</a>	☑	Material aspects boundary outside the organization
G4-22	<a href="#">Report Profile</a>	☑	Effects and reasons of restated information
G4-23	<a href="#">Report Profile</a>	☑	Significant changes in Report scope, boundary, methods
<b>Stakeholder Engagement</b>			
G4-24	<a href="#">Stakeholders</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a>	☑	Stakeholder groups engaged by the organization
G4-25	<a href="#">Stakeholders</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a>	☑	Stakeholder identification and selection for engagement

General Standard Disclosures	Report location / Notes	External Assurance	Index summary description
G4-26	<a href="#">Report Profile</a> <a href="#">Sustainability Strategy</a> <a href="#">Stakeholders</a> <a href="#">Materiality Analysis</a> <a href="#">Additional Information for GRI Indicators / Stakeholders</a> <a href="#">Customer Service and Satisfaction</a> <a href="#">Employee Communication, Engagement and Satisfaction</a>	☑	Approaches to stakeholder engagement
G4-27	<a href="#">Additional Information for GRI Indicators / Stakeholders</a>	☑	Topics and concerns raised by stakeholders
<b>Report Profile</b>			
G4-28	<a href="#">Report Profile</a>	☑	Reporting period
G4-29	The most recent published report covers the period from January 1 to December 31, 2015	☑	Date of most recent report
G4-30	Annual	☑	Reporting cycle
G4-31	<a href="#">Report Profile</a>	☑	Contact point about the Report
G4-32	<a href="#">Global Reporting Initiative Content Index</a>	☑	GRI Content Index
G4-33	<a href="#">Independent Assurance Report</a>	☑	External assurance policy
<b>Governance</b>			
G4-34	<a href="#">Corporate Governance</a> <a href="#">Sustainability Governance</a>	☑	Governance structure
<b>Ethics and Integrity</b>			
G4-56	<a href="#">Sustainability Strategy</a> <a href="#">Policies and Management of Enterprise Risk and Compliance</a> <a href="#">Integrated Management System</a>	☑	Organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics

## Specific Standard Disclosures

Specific Standard Disclosures	Report location / Notes	Omissions	External assurance	Index summary description
<b>ECONOMIC</b>				
<b>Material Issue: Economic Performance</b>				
G4-DMA	<a href="#">Greece Sustainability Strategy</a>		☑	Disclosure on Management Approach
G4-EC1	<a href="#">Greece</a>		☑	Direct economic value generated and distributed
G4-EC2	<a href="#">Products and Services for Sustainability Energy and Climate Change</a>			Financial implications and other risks and opportunities for the organization's activities due to climate change
G4-EC4	OTE and COSMOTE do not receive any government financial subsidies (except from co-funding contributions from the Greek State and the European Commission for developmental or competitive projects), special tax relief or other government financial support			Financial assistance received from government
<b>Market Presence</b>				
G4-EC5	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>			Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation
G4-EC6	OTE and COSMOTE operate throughout Greece. Although the Group does not have an officially formulated policy for hiring people from local communities, in practice, locality is taken into account in an effort to further support local communities and promote employee wellbeing. It should also be noted that almost 100% of Chief Officers and Executive Directors are Greek citizens.			Proportion of senior management hired from the local community at significant locations of operation
<b>Indirect Economic Impacts</b>				
G4-EC7	<a href="#">Connectivity for All</a> <a href="#">Social Contribution</a> <a href="#">Electromagnetic Fields</a> <a href="#">Other Environmental Aspects</a>			Development and impact of infrastructure investments and services supported
G4-EC8	<a href="#">Products and Services for Sustainability Affordable Prices for All</a> <a href="#">Access to All</a> <a href="#">Social Contribution</a>			Significant indirect economic impacts, including the extent of impacts
<b>Procurement Practices</b>				
G4-EC9	<a href="#">Responsible Procurement and Supply Chain Management</a>			Proportion of spending on local suppliers at significant locations of operation

Specific Standard Disclosures	Report location / Notes	Omissions	External assurance	Index summary description
<b>ENVIRONMENTAL</b>				
<b>Materials</b>				
G4-EN1	<a href="#">Circular Economy</a>			Materials used by weight or volume
G4-EN2	<a href="#">Circular Economy</a>			Percentage of materials used that are recycled input materials
<b>Energy</b>				
G4-EN3	<a href="#">Energy and Climate Change</a> <a href="#">Environmental Performance Data - Energy</a>		☑	Energy consumption within the organization
G4-EN5	<a href="#">Energy and Climate Change</a>		☑	Energy intensity
G4-EN6	<a href="#">Energy and Climate Change</a> <a href="#">Environmental Performance Data - Energy</a>			Reduction of energy consumption
G4-EN7	<a href="#">Energy and Climate Change</a>			Reductions in energy requirements of products and services
<b>Water</b>				
G4-EN8	<a href="#">Circular Economy</a>			Total water withdrawal by source
G4-EN9	<a href="#">Circular Economy</a>			Water sources significantly affected by withdrawal of water
G4-EN10	<a href="#">Circular Economy</a>			Percentage and total volume of water recycled and reused

Specific Standard Disclosures	Report location / Notes	Omissions	External assurance	Index summary description
<b>Biodiversity</b>				
G4-EN11	<u>Other Environmental Aspects</u> OTE Group is committed to minimizing any potential impact that its activities (fixed and mobile telecommunication installations and offices) might have on biodiversity. In this vein it should be noted that:			Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas
G4-EN12	<ul style="list-style-type: none"> <li>Potential impacts are mainly related to the operation of installations in isolated areas necessary for the reliable provision of telecommunication services (energy consumption, EMF emissions) and infrastructure works for upgrading / maintaining telecommunication network (waste generation).</li> </ul>			Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas
G4-EN13	<ul style="list-style-type: none"> <li>All potential impacts are addressed in the Environmental Impact Assessment studies carried out and submitted for approval to the designated authorities as foreseen by national legislation in force. In these studies, special reference is made to protected areas (NATURA, SPA, RAMSAR, CORINE, IBA) and areas of high biodiversity value that are near to OTE and COSMOTE activities. 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 and COSMOTE.</li> </ul>			Habitats protected or restored
G4-EN14	<ul style="list-style-type: none"> <li>The majority of the installations are small, without permanent personnel and with limited transportation activities at the operational stage.</li> </ul>			Total number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk
<b>Emissions</b>				
G4-EN15	<u>Energy and Climate Change</u> <u>Other Environmental Aspects</u> <u>Environmental Performance Data - Energy</u>		☑	Direct greenhouse gas (GHG) emissions (Scope 1)
G4-EN16	<u>Energy and Climate Change</u> <u>Environmental Performance Data - Energy</u>		☑	Energy indirect greenhouse gas (GHG) emissions (Scope 2)
G4-EN17	<u>Energy and Climate Change</u>			Other indirect greenhouse gas (GHG) emissions (Scope 3)
G4-EN18	<u>Energy and Climate Change</u>		☑	Greenhouse gas (GHG) emissions intensity
G4-EN19	<u>Energy and Climate Change</u> <u>Environmental Performance Data - Energy</u>			Reduction of greenhouse gas (GHG) emissions
G4-EN20	<u>Other Environmental Aspects</u>			Emissions of ozone-depleting substances (ODS)
G4-EN21	<u>Additional Information for GRI Indicators / Direct Non-GHG Emissions</u>			NO <sub>x</sub> , SO <sub>x</sub> , and other significant air emissions



Specific Standard Disclosures	Report location / Notes	Omissions	External assurance	Index summary description
<b>Material Issue: Effluents and Waste</b>				
G4-DMA	<u>Approach (Sustainable Environment for All)</u> <u>Circular Economy</u>		☑	Disclosure on Management Approach
G4-EN22	<u>Circular Economy</u>			Total water discharge by quality and destination
G4-EN23	<u>Circular Economy</u> <u>Environmental Performance Data - Waste</u>		☑	Total weight of waste by type and disposal method
G4-EN24	<u>Circular Economy</u> There were no significant spills during the management of batteries and lubricants		☑	Total number and volume of significant spills
G4-EN25	<u>Circular Economy</u>			Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally
G4-EN26	<u>Circular Economy</u>			Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the organization's discharges of water and runoff
<b>Products and Services</b>				
G4-EN27	<u>Electromagnetic Fields</u> Additional Information for GRI Indicators / Noise and Visual Impact			Extent of impact mitigation of environmental impacts of products and services
G4-EN28	Quantities collected (and forwarded for recycling) in Groups' retail network are not limited to COSMOTE products, while COSMOTE 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 and COSMOTE 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 and COSMOTE to know the actual quantities of their packaging materials reclaimed and recycled, as it is the responsibility of these systems to do so.			Percentage of products sold and their packaging materials that are reclaimed by category

Specific Standard Disclosures	Report location / Notes	Omissions	External assurance	Index summary description
<b>Compliance</b>				
G4-EN29	The fines (related to the environment) imposed in 2016 amounted to € 20,792, while no non-monetary sanctions or complaints were brought before dispute resolution mechanisms. The aforementioned amount of fines is expected to decrease, due to available judicial procedures.			Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations
<b>Transport</b>				
G4-EN30	<a href="#">Energy and Climate Change</a> <a href="#">Additional Information for GRI Indicators / Direct Non-GHG Emissions</a> <a href="#">Environmental Performance Data - Energy</a>			Significant environmental impacts of transporting products and other goods and materials for the organization's operations, and transporting members of the workforce
<b>Overall</b>				
G4-EN31	Environmental protection expenditures for 2016 amounted to € 610,000 and cover waste treatment, management and disposal, environmental impact assessment studies, external certification of environmental management systems and measurements on electromagnetic fields.			Total environmental protection expenditures and investments by type
<b>Supplier Environmental Assessment</b>				
G4-EN32	<a href="#">Responsible Procurement and Supply Chain Management</a>			Percentage of new suppliers that were screened using environmental criteria
G4-EN33	<a href="#">Responsible Procurement and Supply Chain Management</a>			Significant actual and potential negative environmental impacts in the supply chain and actions taken
<b>Environmental Grievance Mechanisms</b>				
G4-EN34	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>			Number of grievances about environmental impacts filed, addressed, and resolved through formal grievance mechanisms
<b>SOCIAL: LABOR PRACTICES AND DECENT WORK</b>				
<b>Employment</b>				
G4-LA1	<a href="#">Employment</a> <a href="#">Human Resources Performance Data</a>			Total number and rates of new employee hires and employee turnover by age group, gender, and region
G4-LA2	<a href="#">Additional Information for GRI Indicators / Employee Benefits</a>			Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation
G4-LA3	All employees, female and male, returned to their normal duties			Return to work and retention rates after parental leave, by gender

Specific Standard Disclosures	Report location / Notes	Omissions	External assurance	Index summary description
<b>Labor/Management Relations</b>				
G4-LA4	For any significant change in their operation (e.g. reorganization, outsourcing operation, business interruption, expansions, new job positions, acquisitions, sale of all or part of the company, or mergers), OTE and COSMOTE inform or consult the most representative trade unions as appropriate, applying each time the current legislative framework.			Minimum notice periods regarding operational changes, including whether these are specified in collective agreements
<b>Material Issue: Occupational Health and Safety</b>				
G4-DMA	<a href="#">Health and Safety</a> <a href="#">OTE Group Social Charter</a> <a href="#">OTE Group Policy on Employee Relations</a>		☑	Disclosure on Management Approach
G4-LA6	<a href="#">Additional Information for GRI Indicators / Health and Safety Performance</a> <a href="#">Human Resources Performance Data</a>		☑	Type of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities
<b>Training and Education</b>				
G4-LA9	<a href="#">Employee Training and Skills Development</a> <a href="#">Human Resources Performance Data</a>		☑	Average hours of training per year per employee by gender, and by employee category
G4-LA10	<a href="#">Employee Selection, Attracting and Retaining Talented Employees</a> <a href="#">Employee Training and Skills Development</a>			Programs for skills management and lifelong learning
G4-LA11	<a href="#">Employee Selection, Attracting and Retaining Talented Employees</a>			Percentage of employees receiving regular performance and development reviews, by gender and by employee category
<b>Diversity and Equal Opportunity</b>				
G4-LA12	<a href="#">Employment</a> <a href="#">Fair Employment Policy Framework and Equal Opportunities</a> <a href="#">Human Resources Performance Data</a> <a href="#">OTE Group Social Charter</a> <a href="#">OTE Group Policy on Employee Relations</a> Minority group membership is not a material issue for the operation of OTE and COSMOTE in Greece			Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity
<b>Equal Remuneration for Women and Men</b>				
G4-LA13	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>			Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation

Specific Standard Disclosures	Report location / Notes	Omissions	External assurance	Index summary description
<b>Supplier Assessment for Labor Practices</b>				
G4-LA14	<a href="#">Responsible Procurement and Supply Chain Management</a>			Percentage of new suppliers that were screened using labor practices criteria
G4-LA15	<a href="#">Responsible Procurement and Supply Chain Management</a>			Significant actual and potential negative impacts for labor practices in the supply chain and actions taken
<b>Labor Practices Grievance Mechanisms</b>				
G4-LA16	<a href="#">Policies and Management of Enterprise Risk and Compliance</a>			Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms
<b>SOCIAL: HUMAN RIGHTS</b>				
<b>Investment</b>				
G4-HR2	<a href="#">Human Rights Management</a>			Employee training on human rights policies
<b>Non-discrimination</b>				
G4-HR3	<a href="#">Human Rights Management</a>			Total number of incidents of discrimination and corrective actions taken
<b>Freedom of Association and Collective Bargaining</b>				
G4-HR4	<a href="#">Human Rights Management</a> <a href="#">Fair Employment Policy Framework and Equal Opportunities</a> <a href="#">Responsible Procurement and Supply Chain Management</a> <a href="#">OTE Group Social Charter</a> <a href="#">OTE Group Policy on Employee Relations</a>			Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights
<b>Child Labour</b>				
G4-HR5	<a href="#">Human Rights Management</a> <a href="#">Responsible Procurement and Supply Chain Management</a> <a href="#">OTE Group Social Charter</a> <a href="#">OTE Group Policy on Employee Relations</a>			Operations and suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor
<b>Forced or Compulsory Labor</b>				
G4-HR6	<a href="#">Human Rights Management</a> <a href="#">Responsible Procurement and Supply Chain Management</a> <a href="#">OTE Group Social Charter</a>			Operations and suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor

Specific Standard Disclosures	Report location / Notes	Omissions	External assurance	Index summary description
<b>Security Practices</b>				
G4-HR7	<u>Human Rights Management</u>			Percentage of security personnel trained in the organization's human rights policies or procedures that are relevant to operations
<b>Supplier Human Rights Assessment</b>				
G4-HR10	<u>Responsible Procurement and Supply Chain Management</u>			Percentage of new suppliers that were screened using human rights criteria
G4-HR11	<u>Responsible Procurement and Supply Chain Management</u>			Significant actual and potential negative human rights impacts in the supply chain and actions taken
<b>Human Rights Grievance Mechanisms</b>				
G4-HR12	<u>Human Rights Management</u> <u>Policies and Management of Enterprise Risk and Compliance</u>			Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms
<b>SOCIAL: SOCIETY</b>				
<b>Local Communities</b>				
G4-S01	<u>Social Contribution</u>			Percentage of operations with implemented local community engagement, impact assessments, and development programs
G4-S02	<u>Social Contribution</u> <u>Electromagnetic Fields</u> <u>Other Environmental Aspects</u>			Operations with negative impacts on local communities
<b>Material Issue: Anti-corruption</b>				
G4-DMA	<u>Policies and Management of Enterprise Risk and Compliance</u>		☑	Disclosure on Management Approach
G4-S03	<u>Policies and Management of Enterprise Risk and Compliance</u>		☑	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified
G4-S04	<u>Policies and Management of Enterprise Risk and Compliance</u>			Communication and training on anti-corruption policies and procedures
G4-S05	<u>Policies and Management of Enterprise Risk and Compliance</u>		☑	Confirmed incidents of corruption and actions taken

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

Specific Standard Disclosures	Report location / Notes	Omissions	External assurance	Index summary description
<b>SOCIAL: PRODUCT RESPONSIBILITY</b>				
<b>Material Issue: Customer Health and Safety</b>				
G4-DMA	Information on EMF is presented as it is a material issue that is related to customer health and safety <u>Electromagnetic Fields</u>		☑	Disclosure on Management Approach
G4-PR1	<u>Responsible Communication with Customers</u> <u>Electromagnetic Fields</u>		☑	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement
G4-PR2	<u>Responsible Communication with Customers</u> <u>Electromagnetic Fields</u>		☑	Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes
<b>Product and Service Labeling</b>				
G4-PR3	<u>Responsible Communication with Customers</u>			Information regarding products and services
G4-PR4	<u>Responsible Communication with Customers</u>			Non-compliance with regulations and voluntary codes concerning product and service information and labeling
G4-PR5	<u>Customer Service and Satisfaction</u>			Results of surveys measuring customer satisfaction
<b>Marketing Communications</b>				
G4-PR6	<u>Responsible Communication with Customers</u>			Sale of banned or disputed products
G4-PR7	<u>Responsible Communication with Customers</u>			Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes
<b>Material Issue: Customer Privacy</b>				
G4-DMA	<u>Security and Data Privacy</u>		☑	Disclosure on Management Approach
G4-PR8	<u>Security and Data Privacy</u>		☑	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data
<b>Compliance</b>				
G4-PR9	<u>Responsible Communication with Customers</u>			Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services

## GRI Index - Additionan information

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

Organization / Initiative	Company	Participation Type
<b>National level</b>		
CSR Hellas Network	<u>OTE Group</u>	Members. OTE is a member since 2001 and COSMOTE since 2005.
Hellenic branch of UN Global Compact (UNGC)	<u>OTE / COSMOTE</u>	Members since 2008. OTE and COSMOTE have committed, through their CEO, to implement, disclose, and promote the 10 universal principles of UNGC and to release a Communication on Progress (CoP) report annually.
Federation of Hellenic Enterprises (SEV) Council for Sustainable Development	<u>OTE Group</u>	Member since 2014.
Initiative Sustainable Greece 2020	<u>OTE Group</u>	Participation since 2014, as «Ambassadors of Sustainability». Initiative Sustainable Greece 2020 aims to develop a structured dialogue and the creation of methodologies and tools that will support Greece's course towards sustainable development at both the microeconomic and macro level.
Corporate Responsibility Institute, Greece	<u>OTE</u>	Member since 2008.
Global Sustain	<u>OTE Group</u>	Members since 2007.
Road Safety Institute «Panos Mylonas»	<u>COSMOTE</u>	Member and sponsor since 2009.
«Roads to the Future» Alliance for safety and courtesy on the road	COSMOTE	Member and sponsor since 2009. A Memorandum of Cooperation has been signed.
<b>European level</b>		
European Telecommunications Network Operators' Association (ETNO)	<u>OTE</u>	Founding member of ETNO since 1992 and member of Sustainability Working Group since 2007. OTE signed the Sustainability Charter in 2011.
European Telecommunications Standards Institute (ETSI)	<u>COSMOTE</u>	Member since 1998.
<b>International level</b>		
GeSI (Global e-Sustainability Initiative)	<u>OTE</u>	Member since 2010.
GSM Association (GSM)	<u>COSMOTE</u>	Member of the World Association of Mobile Communications Services since 1997. COSMOTE actively participates in many of its workgroups.
International Telecommunication Union (ITU)	<u>OTE</u>	Associated member, since the beginning of the 90's.
CFSI (Conflict-Free Sourcing Initiative)	<u>OTE</u>	Member since 2010.



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

Most important issues for management and stakeholders	Related GRI G4 Issue	Demarcation (inside / outside companies)
3 Data security and privacy	Customer Privacy	The issue is primarily internal and has an impact on the operation of the companies, and is likely to affect all their stakeholders.
9 Employees health, safety and wellness	Employees Health and Safety	The issue is primarily internal and has an impact on the operation of the companies, their employees and their suppliers.
17 Responsible Competitiveness	Anti-Competitive Behavior	The issue is primarily internal, has an impact on the operation of the companies, and may affect their shareholders, employees, suppliers and customers.
18 Economic Performance	Financial Performance	The issue is primarily internal, has an impact on the operation of the companies, and may affect their shareholders, employees, suppliers and customers.
19 Business resilience	-	The issue is primarily internal, has an impact on the operation of the companies, and may affect their shareholders, employees, suppliers and customers.
20 Compliance, anti-corruption and bribery	Combating corruption and bribery, Compliance	The issue is primarily internal, has an impact on the operation of the companies, and may affect their shareholders, employees, suppliers and customers.
25 Electromagnetic radiation	Customer Health and Safety	The issue is internal as it is dependent upon and affects the operation of enterprises, and external as its potential impact could affect shareholders, employees, suppliers and customers.
28 Waste Management	Waste and Wastewater	The issue is internal as it is dependent upon and affects the operation of enterprises, and external as any potential impact can particularly affect employees, suppliers and customers.

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

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

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

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE's and COSMOTE's Responsiveness
<b>Business</b>	Press releases	Ongoing	<ul style="list-style-type: none"> <li>• Corporate governance</li> <li>• Economic performance</li> <li>• Market Presence</li> <li>• Procurement Practices</li> <li>• Employment</li> <li>• Joint actions to improve the competitive environment and influence the Greek state policies</li> <li>• Actions to reduce cost and optimize coverage</li> </ul>	<a href="#">OTE Group</a> <a href="#">Digital Society</a> <a href="#">Responsible Employment and Development</a>
	Economic Results Releases	Quarterly		
	Roadshows	Ongoing		
	Meetings	Ongoing		
	Conference calls	Ongoing		
	Annual reports	Annual		
	Presentations	Ongoing		
	Trainings	Ongoing		
	Sustainability Report	Annual		
<b>Science, research and education</b>	Meetings	Frequently	<ul style="list-style-type: none"> <li>• New technology products and services</li> <li>• Communication safety</li> <li>• Technology awareness</li> </ul>	<a href="#">Safe and Responsible Technology Use</a> <a href="#">Research and Innovation</a> <a href="#">Social Contribution</a>
	Conference calls	Ongoing		
	E-mails	Ongoing		
	Dissemination activities (workshops, conferences, etc.)	Frequently		
	Conferences	Ongoing		
	Surveys	Ongoing		
	Sustainability Report	Annual		
<b>NGOs and interest groups</b>	Meetings	Bi-annually	<ul style="list-style-type: none"> <li>• Importance of adopting CR</li> <li>• Internet Safety public education</li> <li>• Support for vulnerable groups and charities</li> <li>• Social Contribution</li> <li>• EMF, Biodiversity</li> <li>• Environmental performance</li> </ul>	<a href="#">Sustainability Report</a> (all sections)
	CR surveys	Annual		
	Conferences	Ongoing		
	E-mails	Ongoing		
	Working groups	Ongoing		
	Consultation	Ongoing		
	Sustainability Report	Annual		

Stakeholders	Type of Dialogue	Frequency	Main Topics Raised	OTE's and COSMOTE's Responsiveness
<b>Media</b>	Announcements / Press releases	Ongoing	<ul style="list-style-type: none"> <li>• Management</li> <li>• HR issues</li> <li>• Industry developments and market structure</li> <li>• Technology advances/network infrastructure</li> <li>• New product launches</li> <li>• TV market</li> <li>• Technology and telecommunications</li> <li>• Business and finance policies</li> <li>• Culture</li> <li>• CR</li> </ul>	<a href="#">Sustainability Report</a> (all sections)
	Informational material	Ongoing		
	Events / Press conferences	Ongoing		
	Other media contacts	Ongoing		
	CR surveys	Annual		
	Sustainability Report	Annual		
<b>State / Government entities</b>	Consultations on proposed laws and regulatory frameworks for telecommunication markets	Ongoing	<ul style="list-style-type: none"> <li>• Implementation of regulatory measures applying to OTE</li> <li>• Issues of effective regulatory adjustment</li> <li>• Specialized national goals for European Digital Agenda Strategy</li> <li>• Transparency</li> <li>• Governance</li> <li>• Economic growth</li> <li>• Energy and environment</li> <li>• Infrastructure construction and maintenance</li> <li>• Social security</li> </ul>	<a href="#">Corporate Governance Policies and Management of Enterprise Risk and Compliance</a> <a href="#">Responsible Competition</a> <a href="#">Connectivity for All</a> <a href="#">Responsible Communication with Customers</a> <a href="#">Social Contribution</a> <a href="#">Sustainable Environment for All</a>
	Written or verbal communication with regulatory and public sector bodies	Ongoing		
	Dialogue with representatives of national and local authorities	Ongoing		
	CR surveys	Annual		
	Attendance in associations and unions	Ongoing		
	Systematic liaison with local authorities (mostly regional)	Ongoing		
	Sustainability Report	Annual		

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

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

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



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

Main Benefits to OTE employees per category in 2016	Main Benefits to COSMOTE employees per category in 2016
<b>Insurance</b>	
<ul style="list-style-type: none"> <li>• Health insurance program for all employees and dependents</li> <li>• Life insurance program for all employees</li> </ul>	<ul style="list-style-type: none"> <li>• Health insurance program for all employees and dependents</li> <li>• Life insurance program for all employees</li> <li>• Pension Plan</li> </ul>
<b>Group products and services</b>	
<ul style="list-style-type: none"> <li>• Corporate mobile phone and handset subsidy</li> <li>• Fixed telephony packages, internet and COSMOTE TV for all employees, but also ability to purchase company products at special prices</li> <li>• Ability to purchase products through the Group's shops with special discounts for OTE employees</li> </ul>	<ul style="list-style-type: none"> <li>• Corporate mobile phone and handset subsidy</li> <li>• Fixed telephony packages, internet and COSMOTE TV for all employees, but also ability to purchase company products at special prices</li> <li>• Ability to purchase products through the Group's shops with special discounts for COSMOTE employees</li> </ul>
<b>Other benefits</b>	
<ul style="list-style-type: none"> <li>• Provision of special prices for goods and services of other companies</li> <li>• Offering, through a draw, of tickets to sporting and cultural events</li> <li>• Issuing of Food Vouchers</li> <li>• Staff bus for transportation of personnel to and from subway stations and commuter rail</li> <li>• Provision of multi-trip card or e-PASS, for employees in the Paiania building</li> <li>• Operation of restaurants / canteens in central buildings of the company</li> </ul>	<ul style="list-style-type: none"> <li>• Provision of special prices for goods and services of other companies</li> <li>• Offering, through a draw, of tickets to sporting and cultural events</li> <li>• Issuing of Food Vouchers</li> <li>• Staff bus for transportation of personnel to and from subway stations and commuter rail</li> <li>• Provision of multi-trip card or e-PASS, for employees in the Paiania building</li> <li>• Operation of restaurants / canteens in central buildings of the company</li> </ul>
<b>Family</b>	
<ul style="list-style-type: none"> <li>• Allowance for child care and nursery costs</li> <li>• Saving program through the "Youth Account" program</li> <li>• Wedding gift</li> <li>• Financial support of employees</li> <li>• Financial rewards for graduation with high honors of employees' children from public institutions of higher education or language training</li> <li>• Financial rewards for employees' children, who excel in institutions of higher education</li> <li>• Implement special policies for working mothers and people with disabilities</li> <li>• Special support for large families</li> <li>• Financial support through "Fund for Mutual Help" for health expenses</li> <li>• Christmas gifts to employees' children</li> <li>• Privileged mobile program for employees' children who are students</li> <li>• School supplies - books - games at preferential prices through Cosmotebooks</li> </ul>	<ul style="list-style-type: none"> <li>• Allowance for child care and nursery costs</li> <li>• Implement special policies for working mothers and people with disabilities</li> <li>• Financial support of employees</li> <li>• Financial rewards for employees' children who excel in institutions of higher education</li> <li>• Christmas gifts to employees' children</li> <li>• Privileged mobile program for employees' children who are students</li> <li>• School supplies - books - games at preferential prices through Cosmotebooks</li> </ul>
<b>Free time - Vacation</b>	
<ul style="list-style-type: none"> <li>• Through OPAKE, OTE offers its employees stay in privately owned resorts and at selected hotels in Greece and abroad</li> </ul>	<ul style="list-style-type: none"> <li>• Through OPAKE, OTE offers its employees stay in privately owned resorts and at selected hotels in Greece and abroad</li> </ul>
<b>Athletics</b>	
<ul style="list-style-type: none"> <li>• Conducting internal championships in team sport football 5x5 and participation in external corporate championships (regarding basketball and volleyball)</li> <li>• Operation of fitness facilities in the Paiania building</li> </ul>	<ul style="list-style-type: none"> <li>• Conducting internal championships in team sport football 5x5 and participation in external corporate championships (regarding basketball and volleyball)</li> <li>• Operation of fitness facilities in the Paiania building</li> </ul>

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

2015 Health and Safety Performance		
	OTE	COSMOTE
<b>Fatalities</b>		
Employee Fatalities	None	None
Contractor Fatalities	N/A	N/A
<b>Work Related Accidents (employees)</b>		
<b>Number of Employees Injured</b>	<b>52</b>	<b>9</b>
Men	41	3
Women	11	6
<b>Injury Rate <sup>1</sup></b>	<b>0.66</b>	<b>0.45</b>
Men	0.73	0.31
Women	0.48	0.60
<b>Occupational Disease Rate <sup>2</sup></b>	<b>0</b>	<b>0</b>
Men	0	0
Women	0	0
<b>Lost Day Rate <sup>3</sup></b>	<b>27.87</b>	<b>10.64</b>
Men	33.50	10.95
Women	13.98	10.33
<b>Absentee Rate <sup>4</sup></b>	<b>600.57</b>	<b>643.14</b>

### NOTES:

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

weeks for 40 hours per 100 employees. Lost days for OTE are calculated as calendar days, while for COSMOTE lost days are calculated as scheduled work days. Lost days count begins on the day of the injury or the next day, depending on the time of the day that the injury occurs.

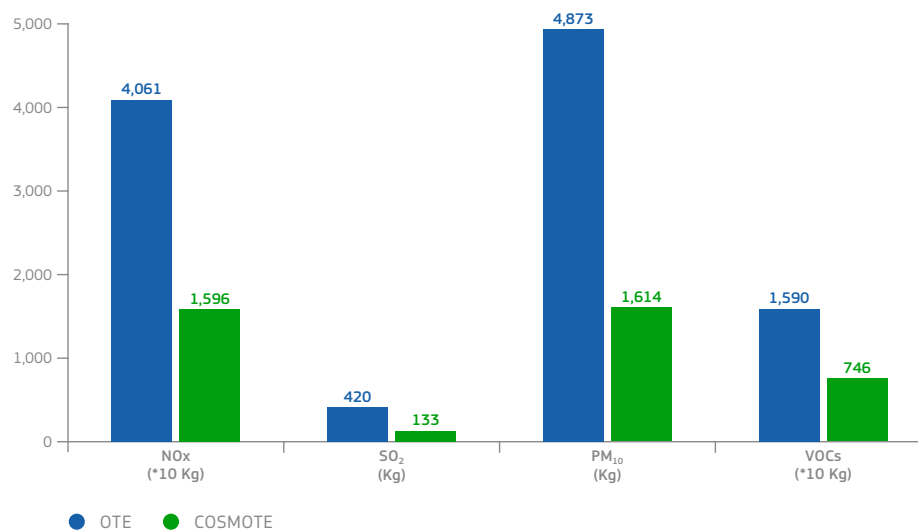
4. Absentee rate = (Total number of missed absentee days / Total number of workforce days worked) x 25,000. The factor 25,000 is derived from 50 working weeks for 5 days per 100 employees. This rate is not monitored per gender.

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

Noise	Visual Impact																																									
<p>In general, the noise impact from OTE and COSMOTE activities 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).</p> <ul style="list-style-type: none"> <li>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, OTE and COSMOTE make soundproofing constructions or install hybrid systems, to reduce the operating hours of the generators, or replace old units with new, more advanced ones that operate at lower noise levels.</li> <li>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.</li> </ul>	<p>Telecommunications companies have relatively small visual impact on the environment. However, to minimize whatever impact may exist:</p> <ul style="list-style-type: none"> <li>The size of new Base Stations being built now has been decreased</li> <li>Efforts are made to collocate Base Stations in common installations with the other two mobile telephony companies so as to reduce overall visual impact of mobile Base Stations</li> <li>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</li> <li>Appropriate modifications are also applied to existing telecommunication infrastructure</li> </ul>																																									
<table border="1"> <thead> <tr> <th data-bbox="1133 520 1532 564">Number</th> <th data-bbox="1541 520 1653 564">2012</th> <th data-bbox="1662 520 1774 564">2013</th> <th data-bbox="1783 520 1895 564">2014</th> <th data-bbox="1904 520 2016 564">2015</th> <th data-bbox="2024 520 2136 564">2016</th> </tr> </thead> <tbody> <tr> <td data-bbox="1133 571 1532 616">New base stations</td> <td data-bbox="1541 571 1653 616">119</td> <td data-bbox="1662 571 1774 616">107</td> <td data-bbox="1783 571 1895 616">145</td> <td data-bbox="1904 571 2016 616">166</td> <td data-bbox="2024 571 2136 616">211</td> </tr> <tr> <td data-bbox="1133 622 1532 667">New base stations collocations</td> <td data-bbox="1541 622 1653 667">0</td> <td data-bbox="1662 622 1774 667">2</td> <td data-bbox="1783 622 1895 667">1</td> <td data-bbox="1904 622 2016 667">0</td> <td data-bbox="2024 622 2136 667">0</td> </tr> <tr> <td data-bbox="1133 673 1532 718"><b>Special constructions</b></td> <td data-bbox="1541 673 1653 718"></td> <td data-bbox="1662 673 1774 718"></td> <td data-bbox="1783 673 1895 718"></td> <td data-bbox="1904 673 2016 718"></td> <td data-bbox="2024 673 2136 718"></td> </tr> <tr> <td data-bbox="1133 724 1532 769">OTE</td> <td data-bbox="1541 724 1653 769">2</td> <td data-bbox="1662 724 1774 769">4</td> <td data-bbox="1783 724 1895 769">4</td> <td data-bbox="1904 724 2016 769">4</td> <td data-bbox="2024 724 2136 769">1</td> </tr> <tr> <td data-bbox="1133 775 1532 820">COSMOTE</td> <td data-bbox="1541 775 1653 820">82</td> <td data-bbox="1662 775 1774 820">70</td> <td data-bbox="1783 775 1895 820">114</td> <td data-bbox="1904 775 2016 820">150</td> <td data-bbox="2024 775 2136 820">167</td> </tr> </tbody> </table>							Number	2012	2013	2014	2015	2016	New base stations	119	107	145	166	211	New base stations collocations	0	2	1	0	0	<b>Special constructions</b>						OTE	2	4	4	4	1	COSMOTE	82	70	114	150	167
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## Direct Non-GHG Emissions (Relevant for GRI Indicator G4-EN21)

- Emissions of typical air pollutants (NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub> and VOCs) are mainly related to road transportation (main source for OTE) and the use of electricity generators to support the operation of the telecom network (main source for COSMOTE)
- Emissions of Persistent Organic Pollutants (POP) and Hazardous Air Pollutants (HAP) are of minor importance for OTE and COSMOTE 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.
  - Lead emissions decreased from 22.4 kg in 2008 to 6.7 kg in 2016, as a result of the gradual renewal of the vehicle stock.



## Independent Assurance Report

### Independent Limited Assurance Report to the Management of OTE S.A. and COSMOTE S.A.

KPMG Advisors A.E. was engaged 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 Greek version of their joint sustainability report 2016 titled “OTE Group Sustainability Report 2016” (further referred to as the “Report”) for the reporting period 1 January 2016 - 31 December 2016.

### Scope of our assurance engagement

Our engagement was designed to provide limited assurance in accordance with ISAE 3000<sup>1</sup> and the requirements for a Type 2 assurance engagement under AA1000AS (2008)<sup>2</sup> on the following aspects of the Report (assurance scopes):

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

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

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

<sup>3</sup> AA1000 Principles Standard (2008), issued by AccountAbility.

Appendix of the Report.

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

- Economic Performance (Disclosure on Management Approach –“DMA”- and Indicator G4-EC1)
- Effluents and Waste (DMA and Indicators G4-EN23, G4-EN24)
- Occupational Health and Safety (DMA and Indicator G4-LA6)
- Anti-Corruption (DMA and Indicators G4-SO3, G4-SO5)
- Anti-Competitive behavior (DMA and Indicator G4-SO7)
- Compliance (DMA and Indicator G4-SO8)
- Customer Health and Safety referring to EMF issues (DMA and Indicators G4-PR1, G4-PR2)
- Customer Privacy (DMA and Indicator G4-PR8)

4. The reliability of the following Specific Standard Disclosures for the “Non Material Aspects” marked with the symbol “√” in the GRI Content Index table of the Appendix of the Report: G4-EN3, G4-EN5, G4-EN15, G4-EN16, G4-EN18, G4-LA9.

5. 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.

Our work for the above scopes concerned the operations and activities of the parent companies OTE and COSMOTE in Greece. 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 and COSMOTE

OTE and COSMOTE apply the AA1000APS (2008) criteria for the three principles of inclusivity, materiality and responsiveness as described in section titled «Accountability Principles Standard AA1000 Index» of the Appendix of the Report.

For the Report, OTE and COSMOTE apply the Sustainability Reporting Guidelines (G4) of the GRI as declared in the section of the Report titled «Report Profile» as well as relevant internal guidelines.

In addition, OTE and COSMOTE 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 and COSMOTE 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 2016 of OTE and COSMOTE to the relevant –within our agreed scope– sections of the Report. To obtain a thorough understanding of OTE’s and COSMOTE’s financial results and financial position, the 2016 audited financial statements should be consulted.

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

### Assurance standards we used

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

As explained in more detail at the section “Responsibilities”, we conducted our engagement in accordance with the Code of Ethics for Professional Accountants issued by the Internal Ethics Standards Board for Accountants (IESBA) which requires, among other things, the independence of the members of the assurance team and of the assurance organization, including not being involved in writing the Report.

The Code contains detailed requirements regarding the integrity, objectivity, confidentiality and professional competence and behavior. KPMG has internal systems and processes to monitor compliance with this Code and to prevent potential conflicts regarding independence. Our engagement was conducted by a multidisciplinary team with extensive experience in sustainability (including environmental, social and financial aspects) and sustainability assurance.

### Work performed to reach our conclusions

We planned and performed our work to obtain all the evidence, relevant documentation, information and explanations that we considered necessary in relation to the above scope. Our work 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's and COSMOTE's processes for determining the material issues for its key stakeholder groups inclusive of an evaluation of the results of OTE and COSMOTE stakeholder consultation processes and their methodology.
- Interviews with senior management and relevant managerial staff of OTE and COSMOTE concerning sustainability strategy and policies for material issues and the implementation of these across the business.
- Interviews with relevant OTE and COSMOTE staff responsible for providing information in the Report, during which we also reviewed on a sample basis, systems and/ or processes for information management, internal control and processing of the qualitative

and quantitative information, at the Company level (OTE, COSMOTE). In this context, we tested on sample basis, the reliability of the underlying text and/ or data references mentioned in the General Standard Disclosures and the Specific Standard Disclosures of our agreed assurance scope.

- Review on a sample basis, of the table in the section titled "United Nations Global Compact-Communication on Progress (CoP)" of the Appendix of the Report in relation to the relevance of its cross-references within the Report with the respective United Nations Global Compact Advanced level criteria.
- Enquiring, on a sample basis, about OTE's and COSMOTE'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 and COSMOTE 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 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.

### Our conclusions

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

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

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

- In relation to the principle of inclusivity, OTE and COSMOTE could further enhance their current approach to stakeholder engagement by considering the introduction of focus groups in conjunction with the materiality analysis, in the context of maximizing their capacity to engage.
- In relation to the principle of materiality, OTE and COSMOTE should maintain the current procedures capitalizing on the investment they have already made regarding the incorporation of Enterprise Risk Management principles into sustainability materiality assessment.
- In relation to the principle of responsiveness, OTE and COSMOTE could further communicate in the sustainability report, their approach of addressing different expectations and/ or conflicting stakeholder interests.

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

Based on the procedures performed, as

described above, nothing has come to our attention to suggest that the General Standard Disclosures and the Specific Standard Disclosures (for the "Material Aspects" and the "Non Material Aspects") marked with the symbol "√" in the GRI Content Index table of the Appendix of the Report, are not fairly stated in all material respects.

### Assurance scope 5: 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 their Report, OTE and COSMOTE 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 and COSMOTE management with an internal memo presenting in more detail specific findings and areas for improvement.

### Responsibilities

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

Our responsibility is to carry out a limited assurance engagement and to express a conclusion based on the work performed for the agreed scope, as described above. We conducted our engagement in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS (2008). ISAE 3000 standard requires that we plan and perform the engagement to obtain limited assurance about whether selected aspects of the Report are free from material misstatement. KPMG applies ISQC 1<sup>4</sup> and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

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

Telecommunications S.A. for our work, for this assurance report, or for the conclusions we have reached.

KPMG Advisors A.E.



George Raounas  
Partner  
Athens, June 12 2017



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

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