



# 2021

INTEGRATED REPORT

**E**NVIRONMENT | **S**OCIETY | **G**OVERNANCE

towards a better world for all



GROUP OF COMPANIES



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# Message from the Chairman & CEO



“

TOGETHER, WE CAN  
MAKE SURE A  
BRIGHTER FUTURE IS  
STILL AHEAD OF US

MICHAEL TSAMAZ

Dear Readers,

2021 was another extraordinary year. Extraordinary because of the challenges we faced but also because of the achievements we accomplished. Thanks to our people and OTE Group's strategy, we managed once again to turn challenges to opportunities. Opportunities to do something remarkable. To fulfill our purpose for creating a better world for all. Because we strongly believe that brands with purpose grow and companies with purpose last.

As a technology company, we take on responsibility for finding answers to the most pressing challenges of our time through innovation and sustainable products and services. It is clear to us that sustainable entrepreneurship and profitable growth are mutually dependent, rather than mutually exclusive.

That is why sustainability is at the core of our strategy for more than a decade and into all of our value chain. ESG criteria, embedded in our business, help us measure our performance and be evaluated by Social Responsibility Indices.

We are forging ahead for a sustainable business model and a sustainable world for all, by focusing on:

**Developing an inclusive digital world for all and enhancing Greece's digital future**

In 2021 the OTE Group continued delivering strong financial results, with revenues going up,

a 6% increase in adjusted EBITDA, and low net debt. Our solid financial performance enabled us to announce a radical increase in our investment plan, committing to invest more than €3bn by 2027 focusing on the expansion of Greece's Fiber-To-the-Home (FTTH) and 5G networks, so that more people have access to higher internet speeds. This initiative upgrades Greece's connectivity and secures its digital future.

**Tackling climate change and protecting the environment**

Climate change raises environmental, social, and economic crises on a whole new level. Wild fires like those we witnessed last summer in Greece will likely be seen much more frequently in the future.

The world seems to need all the ingenuity it can muster, moonshot thinking, and collaboration between governments, business and individuals to help the planet.

The OTE Group has undertaken its share of responsibility in committing, along with Deutsche Telekom, to be climate neutral, for its own operation, by as early as 2025.

To that end, in 2021 we managed to achieve 85% of our climate neutrality target for 2025. We already power our COSMOTE Green Network with electricity from 100% renewable sources. In addition, we are committed to applying the principles of circularity in our business and properly manage resource efficiencies.

As a leading technology provider, COSMOTE stands ready to support its customers, partners, and the country in their move towards a net zero, environmentally sustainable future.

**Creating an inclusive and prosperous world**

In 2021 OTE Group's social contribution exceeded €2.7m with 4.1m beneficiaries. Along with an inclusive digital society, we strive to support society's other major needs for its welfare and the improvement of people's quality of life.

These little of bigger steps by each and every one of us can add up to a big impact for a more sustainable world. Our planet and its people deserve nothing less. It's what the world needs us all to do.

Together, we can make sure a brighter future is still ahead of us. We won't stop to act in accordance with what we think needs to be done today to ensure a better world for all in the future.

This report charts our progress and share insights and areas of growth for the future.

I hope you enjoy reading.

Stay well and safe,

**Michael Tsamaz**

OTE Group Chairman & CEO

# Report Profile

The 2021 OTE Group Integrated Report refers to the Group's companies' activities.

## Report scope and boundary

This Integrated Report covers the period from 1st January to 31st December 2021 (unless otherwise stated) and is addressed to all OTE Group stakeholder groups. This is OTE Group's third Integrated Report, drafted in line with the principles of the International Integrated Reporting Council (IIRC), which presents consolidated data for the Group.

Financial information refers to all companies of the Group, unless otherwise stated.

Non-financial information has been collected from the following companies that contribute around 99% of OTE Group revenues:

- OTE, COSMOTE, GERMANOS, CTS, OTE Globe, OTE Academy and COSMOTE e-Value (all with headquarters in Greece), and
- Telekom Romania Mobile Communications (with headquarters in Romania).

## Report content definition

The content of the Report is defined according to the following principles, guidelines and directives:

- The Global Reporting Initiative's Sustainability Reporting Guidelines, GRI Standards.
- The AccountAbility AA1000AP Principles on Inclusivity, Materiality, Responsiveness and Impact.
- The United Nation's Global Compact Principles.
- The Athens Stock Exchange (ATHEX) ESG Reporting Guide (version 2022).
- The criteria of the Greek Sustainability Code.

- The Telecommunications Sustainability Accounting Standard issued by SASB (Sustainability Accounting Standards Board).

In addition, the guidelines of the Task Force on Climate-related Financial Disclosures (TCFD) were also considered.

The index tables for each of these standards are provided in the [Appendix](#).

In addition, the companies took into account:

- The Group's vision, strategic pillars and sustainability principles.
- The outcomes of the stakeholders' dialogue.
- The most significant sustainability issues that arose from the Materiality Analysis as well as its re-evaluation which took place in 2021.
- The stakeholders' feedback for the 2020 Integrated Report for OTE Group companies.

The Integrated Report is subject to external assurance, covering the Principles of Standard AA1000AP and specific performance indicators of OTE Group companies (see [Independent Assurance Report](#)).

## Report data

As part of the report development process, all relevant ESG (Environmental, Social and Governance) data have been collected and presented in accordance with the guidelines of the international sustainability reporting principles.

The data in the Report derive from the OTE Group's reporting systems and indicatively include aggregated financial and personnel data, aggregated data on customer service and summary data on regulatory actions. They also include environmental data that are calculated according to internationally accepted methods,

based on information provided by the Operational Divisions of the companies. The collection and presentation of the data were undergone by following the definitions and parameters of the GRI guidelines and Standards, as well as internal guidelines. Further information on measurement techniques and methods for the assessment of data is included in the Report.

No major re-statement of information, provided in earlier sustainability reports, has been included.

## Compilation in accordance with IFRS

The separate and consolidated financial statements have been prepared in accordance with International Financial Reporting Standards (IFRS) as issued by the International Accounting Standards Board (IASB) and interpretations issued by the IFRS Interpretations Committee, as adopted by the European Union.

OTE Group's complete financial activity for 2021 is presented in the [2021 Annual Financial Report](#).

## Compilation in accordance with GRI guidelines

The Report has been written in accordance with the core option of GRI Standards.

Full information on the fulfillment of GRI Standards requirements is provided in the [Global Reporting Initiative Content Index](#).

## Compilation in accordance with the ATHEX ESG Reporting Guide

Leveraging on ATHEX's mission to empower

Greek-listed companies to improve their ESG performance and effectively communicate it with investors, OTE Group discloses its performance with respect to the core, advanced and sector-specific metrics outlined in the Guide.

Full information on the fulfillment of ATHEX ESG Reporting guidelines is provided in the [ATHEX Guide Index](#).

## Compilation in accordance with the TCFD guidelines

OTE Group has a strong and clear climate change strategy which stipulates to minimize the Group's operation's negative impacts on the environment and create opportunities for environmentally friendly products and services towards a carbon neutral economy.

As in the previous report Integrated Report, to complement its climate strategy, OTE Group improved its climate-related disclosures by following the TCFD guidelines. The Report includes disclosures that are in line with all four (4) pillars of TCFD (Governance, Strategy, Risk Management, and Metrics).

Full information with respect to OTE Group's approach is provided in the [Task Force on Climate Related Financial Disclosures \(TCFD\) Index](#).

## Report Feedback

The Report is published exclusively on-line, in electronic form. Any opinion and comments regarding the Integrated Report are welcome. Please send your feedback to the e-mail address: [otegroup.cr@ote.gr](mailto:otegroup.cr@ote.gr).





# OTE Group

## 6%

INCREASE IN ADJ. EBITDA (AL)

## >€908m

TAXES & INSURANCE CONTRIBUTION

## ~€5bn

IN NEW TECHNOLOGIES & INFRASTRUCTURE  
OVER THE PAST DECADE

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## Group Presentation



### OTE GROUP IS THE LARGEST TECHNOLOGY COMPANY IN GREECE

It offers a wide range of services: fixed and mobile telephony, broadband services, pay television and integrated ICT solutions. In addition to its core telecommunications activities, the Group in Greece is also involved in maritime communications and real-estate. Abroad, the Group operates in the telecommunications market of Romania. Details on the Group's products and services are available on its companies' websites and the [Product and Service Portfolio](#) and [Products and Services for Sustainability](#) sections.

#### Greece

Hellenic Telecommunications Organization S.A. ("OTE") is the parent company of the OTE Group and the main fixed telephony operator in Greece. It offers broadband, ICT services, fixed-line telephony, television, data and leased lines.

OTE was incorporated as a société anonyme in Athens, Greece in 1949 and is listed on the Athens Stock Exchange. Until September 19, 2010, OTE

ADRs (American Depositary Receipts) were also listed on the New York Stock Exchange. Following OTE's delisting from NYSE, OTE ADRs now trade in the US OTC (Over the Counter) market. OTE GDRs (Global Depositary Receipts) are also listed on the London Stock Exchange.

The OTE Group includes other than the parent Company, all the entities which OTE controls directly or indirectly. The financial statements of the consolidated non-listed entities, which

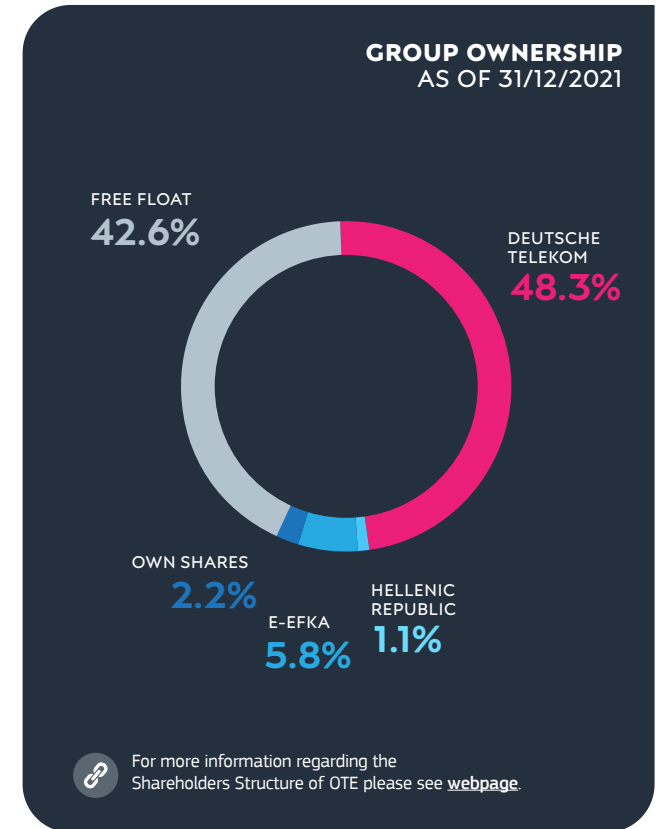
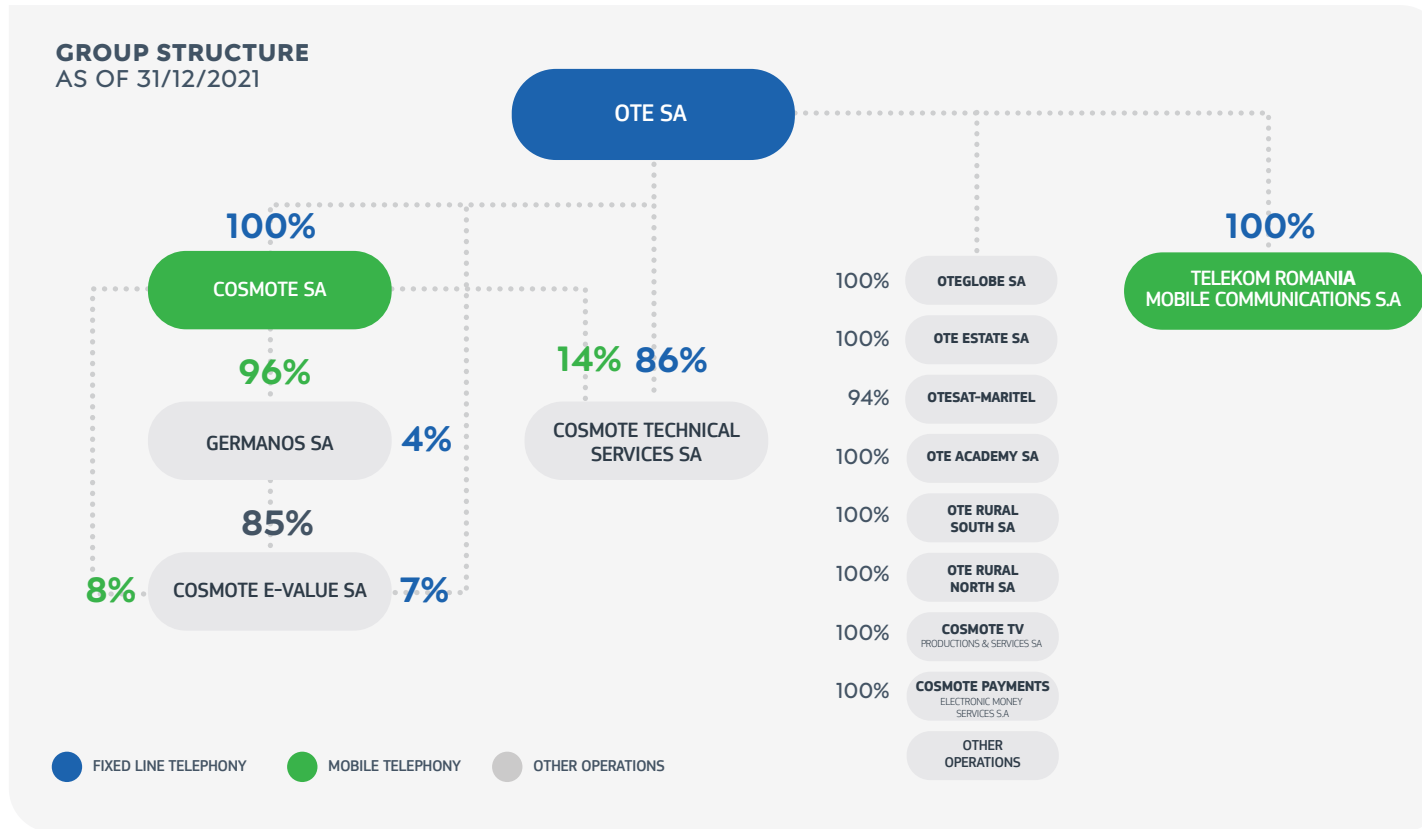
cumulatively represent more than 5.0% of the consolidated total revenues, or consolidated total assets, or consolidated total net profit excluding non-controlling interest, are presented in the following table and are available in the parent Company's [website](#).

COSMOTE S.A., a subsidiary of OTE, is the leading mobile service provider in Greece.

OTE Group also established COSMOTE as the single commercial brand for all fixed, mobile, internet and television products in the Greek market, so that all customers can enjoy an integrated communication and entertainment world with ease, speed and simplicity.

The Group's branch network in Greece comprises of 253 GERMANOS and 118 COSMOTE stores.

OTE GROUP | GROUP PRESENTATION



**OTEGLOBE** operates as a provider of international wholesale telecommunications services. It offers a complete portfolio of services for transfer, voice, mobile and corporate services to other international providers and multinationals.

**OTE ESTATE** is active in the management and commercialization of the OTE Group real estate.

**OTEACADEMY** provides innovative educational

services, contributing to the development of human resources.

**OTESAT\_MARITEL** is a leader in the provision of satellite telecommunications services to the Greek shipping industry and one of the faster growing providers of these services to the global shipping market.

### Romania

Telekom Romania Mobile Communications (TRMC) is a dynamic brand, offering mobile innovative communication services to a broad customer community. Its mission is to enrich people's lives, by offering them mobile integrated services and the latest technologies in mobile communications.

TRMC network is bringing together people, machines and content, connecting them for a better, safer, simpler future. Telekom is a brand of Deutsche Telekom, one of the world's leading integrated telecommunications companies.

**OTE GROUP SUBSIDIARIES**

ENTITY NAME	LINE OF BUSINESS	COUNTRY	GROUP'S OWNERSHIP INTEREST	
			2021	2020
COSMOTE MOBILE TELECOMMUNICATIONS S.A. ("COSMOTE")	Mobile telecommunications services	Greece	100.00%	100.00%
OTE INTERNATIONAL INVESTMENTS LTD	Investment holding entity	Cyprus	-	100.00%
COSMO-ONE HELLAS MARKET SITE S.A. ("COSMO-ONE")	E-commerce services	Greece	61.74%	61.74%
OTE PLC	Financing services	U.K.	100.00%	100.00%
OTESAT-MARITEL S.A. ("OTESAT-MARITEL")	Satellite telecommunications services	Greece	94.09%	94.09%
COSMOTE TECHNICAL SERVICES S.A. ("CTS")	Technical support services	Greece	100.00%	100.00%
OTE ESTATE S.A. ("OTE ESTATE")	Real estate	Greece	100.00%	100.00%
OTE INTERNATIONAL SOLUTIONS S.A. ("OTE GLOBE")	Wholesale telephony services	Greece	100.00%	100.00%
OTE INSURANCE AGENCY S.A. ("OTE INSURANCE")	Insurance brokerage services	Greece	100.00%	100.00%
OTE ACADEMY S.A. ("OTE ACADEMY")	Training services	Greece	100.00%	100.00%
TELEKOM ROMANIA COMMUNICATIONS S.A. ("TELEKOM ROMANIA")	Fixed and mobile telecommunications services	Romania	-	54.01%
NEXTGEN COMMUNICATIONS SRL ("NEXTGEN")	Telecommunications services	Romania	-	54.01%
TELEKOM ROMANIA MOBILE COMMUNICATIONS S.A. ("TELEKOM ROMANIA MOBILE")	Mobile telecommunications services	Romania	100.00%	86.20%
GERMANOS S.A. ("GERMANOS")	Retail services	Greece	100.00%	100.00%
COSMOTE E-VALUE	Marketing services	Greece	100.00%	100.00%
MOBILBEEEP LTD	Retail services	Greece	100.00%	100.00%
COSMOTE TV PRODUCTIONS	TV productions and services	Greece	100.00%	100.00%
E-VALUE DEBTORS AWARENESS ONE PERSON LTD ("E-VALUE LTD")	Overdue accounts management	Greece	100.00%	100.00%
COSMOHOLDING INTERNATIONAL B.V.	Investment holding entity	Netherlands	100.00%	100.00%
E-VALUE INTERNATIONAL S.A.	Marketing services	Romania	100.00%	100.00%
OTE RURAL NORTH SPECIAL PURPOSE DEVELOPMENT AND MANAGEMENT OF BROADBAND INFRASTRUCTURE S.A. ("OTE RURAL NORTH")	Wholesale broadband and infrastructure services	Greece	100.00%	100.00%
OTE RURAL SOUTH SPECIAL PURPOSE DEVELOPMENT AND MANAGEMENT OF BROADBAND INFRASTRUCTURE S.A. ("OTE RURAL SOUTH ")	Wholesale broadband and infrastructure services	Greece	100.00%	100.00%
COSMOTE PAYMENTS - ELECTRONIC MONEY SERVICES S.A. ("COSMOTE PAYMENTS")	Electronic money services	Greece	100.00%	100.00%
COSMOTE GLOBAL SOLUTIONS S.A.	ICT services	Belgium	100.00%	100.00%



## Agreement for the Sale of Telekom Romania

On November 9, 2020 the Group announced that it has entered into an agreement to sell to Orange Romania, its 54.01% stake in TELEKOM ROMANIA.

On September 30, 2021, the transaction was completed for a total consideration of €295.6m.

The transaction was executed through the sale of OTE's interest in OTE INTERNATIONAL INVESTMENTS LTD

## Agreement for the spin-off of the business sectors customer service, shops and technical field operations

On December 4, 2020 the Extraordinary General Meetings of Shareholders of OTE and COSMOTE approved the Draft Demergers Agreement through spin-off of the business sectors of Customer Service, Shops and Technical Field Operations and their absorption by the Group's subsidiaries COSMOTE E-Value, Germanos and CTS, respectively.

The spin-off procedure has been completed on January 4, 2021 upon registration in the Greek General Commercial Registry (Γ.Ε.ΜΗ.).

Following the completion of the spin-off process, the shareholders' structure of the entities COSMOTE E-Value, Germanos and CTS has changed, with no effect on the Group's ownership interest.





# Product and Service Portfolio

## Technology market characteristics

OTE Group as a full-service Digital Telco provides fixed-line voice telephony, internet access services, mobile telephony, and subscription television services, as well as television and integrated ICT solutions in Greece. Abroad, the Group operates in the telecommunications market of Romania.

According to the latest [market review of the Electronic Communications and Postal Services sector, carried out by the Hellenic Telecommunications and Post Commission \(EETT\)](#), in Greece, the Telecommunications services is the leading category in the telecom sector and accounts for 86.8% of the market, while TV for 4.8% and equipment accounts for the remaining 8.4% of the turnover. Moreover, the telecommunication sector's contribution to Greece's GDP amounted to 2.9% in 2020.

OTE Group invests heavily in New Generation Networks, creating infrastructure which will boost the Greek economy and create growth potential. It is the largest investor in new technologies and infrastructure in Greece, having invested approximately €5bn over the past decade. Furthermore, the Group implements an investment plan which will exceed €3bn by 2027, to offer even higher speeds and wider coverage in fixed and mobile telephony.

PRIMARY TELECOM PRODUCTS AND SERVICES							
	FIXED TELEPHONY	MOBILE TELEPHONY	TV SERVICES & CONTENT	CONVERGED SERVICES	BUSINESS IT SOLUTIONS	CUSTOMER & RETAIL SERVICES	WHOLESALE SERVICES
COSMOTE	●	●	●	●	●	●	●
Germanos						●	
COSMOTE e-Value						●	
CTS						●	
OTEGLOBE							●
OTE RURAL							●

## Primary telecom products and services

COSMOTE has been assigned as the brand ambassador for OTE Group's primary telecom products and services, to ensure their uninterrupted provision to all OTE Group customers.

### Fixed telephony

OTE Group provides local, long-distance and international fixed-line telecommunications services in Greece offering internet access services and fully integrated internet protocol (IP) based

telecommunications solutions over Vectoring / Super vectoring and Fiber-To-The-Home (FTTH) infrastructure.

In addition, it offers a wide range of other telecommunications services, including value-added services, Intelligent Network services, IP-based hosting services, leased lines, public telephone services, operator assistance services, sales of fixed equipment and directory services.

### Mobile telephony

OTE Group offers mobile telephony and data services through COSMOTE in Greece and Telekom Romania Mobile Communications in Romania:

- **Greece**, using GSM/GPRS, 4G/LTE, 4G+/LTE-A, 5G and local multipoint distribution service technology.
- **Romania**, using GSM 900, GSM 1800, 3G and 4G technology, as well as using 3G 2100 MHz, through Telekom Romania Mobile Communications.

### TV Services and Content

OTE Group provides television services over both xDSL (IPTV and OTT TV) and satellite. As at 31 December 2021, COSMOTE TV had 624,195 TV subscribers.

**OTE GROUP | PRODUCT AND SERVICES PORTFOLIO****Converged services**

COSMOTE is developing converged (FMC) services bundling fixed, mobile and TV packages in order to address holistic household communication and entertainment needs, enabling both single and family households to experience and share more, wherever they are.

**Business IT solutions**

OTE Group provides to its enterprise and business customers comprehensive Business IT solutions such as: Infrastructure as a Service (“IaaS”) cloud services, cloud servers, cloud storage, Platform as a Service (“PaaS”) and many more. For more details on the specific products and services offered, please refer to the company’s [website](#).

These services are integrated with mainstream connectivity services i.e.: IP virtual private networks (VPN), Ethernet services, leased lines, dedicated internet access, ATM, streaming and radio transmission services, as well as value added services, such as service level agreement services (SLA), quality guarantees with Class of Service (CoS), and managed network services (MNS).

**Customer and Retail Services****COSMOTE e-Value**

COSMOTE e-Value has been providing integrated Contact Center services, since 1999. With more than 20 years of experience in the contact center services field and with around 7,000 specialized agents employed, COSMOTE e-value fully utilizes

all the options provided by digital technology, offering telephone support services, on a 24/7 basis. Its services range from sales growth, customer care, Help Desk and consulting services. The last years, the company has undertaken important projects for domestic and international customers, offering services to over 20 countries in South East Europe in 16 different languages.

**COSMOTE & Germanos Shops**

COSMOTE and Germanos shops are designed to offer a unique experience in terms of design and technology-oriented product range, significantly contributing towards the loyalty and increase of OTE Group’s customer base.

Germanos and COSMOTE retail network leverage on their salesperson expertise and technological orientation and offer OTE and COSMOTE mobile and fixed telephony products and services, Internet and TV plans as well as a wide range of technology products (including smart watches, wearables, smartphones, tablets, laptops, TV sets, game consoles).

**COSMOTE Technical Services (CTS)**

COSMOTE Technical Services (CTS), a subsidiary of OTE Group, is the largest provider of technological support services to residential and business customers in Greece. It has a team of specialized technicians and technology consultants across the country, covering a wide range of expertise: fixed and mobile telephony, broadband services, pay-TV, home or business connectivity and electromechanical services. In addition, it provides process optimization and data analytics consulting services to businesses and organizations.

**Wholesale Services**

Focused on customer experience excellence, as part of the OTE Group growth mindset, OTE Wholesale provides high-quality support and business approach/methods.

OTE Group offers Telcos in Greece, the opportunity to easily create and expand their own portfolio, by choosing from the wide range of available services. More specifically, the services offered are Next Generation Access services (fiber optics and 5G connectivity), Copper access, Data, Voice, Value Added Services (call blocking) and Mobile.

Collaboration with providers creates sustainable growth in the Greek Telco industry, which leads to beneficial end-results in favor of residential and business customers. Long-term synergies of mutual interest provide healthy competition and strengthen the conditions of equity and market’s financial development.

**Global Telecom services**

OTEGLOBE provides international wholesale telephony services and international wholesale data capacity/IP services to telecommunication providers and to multinational companies outside Greece, with a particular focus on the region of South-Eastern Europe.

OTEGLOBE focuses on:

- Important collaborations with customers that take place during the year to serve the increased needs for data traffic; and
- Maintenance of high profitability margin of voice services by serving international traffic through an IP network that ensures quality at competitive prices.

**Fixed infrastructure**

OTE Rural North and South (both 100% OTE Special Purpose subsidiaries) are the Group’s Private Partners for the Project “Development of Broadband NGA Infrastructure in “White” Rural Areas” in Greece providing wholesale telecommunications services via this infrastructure to remote and dispersed residential departments of Greece, mostly mountainous or insular.

The implementation of the project follows the Public-Private Partnership (PPP) scheme, between OTE Rural North and South, OTE and Information Society. Both companies develop and manage a network of telecommunications infrastructure, which supports the provision of wholesale broadband services from third party telecommunication providers to end-users (citizens and businesses) in over 2,000 “white” settlements.

## Sustainable Business Model



OTE GROUP USES TECHNOLOGY AND ITS CAPABILITIES TO CREATE A BETTER WORLD FOR ALL.

At the same time, it enhances its sustainable entrepreneurship, while, contributing to the economy, the society, and the environment.

Sustainability is an integral component of OTE Group's business strategy and its Sustainability Principles are integrated into its operation.

### Responsible Business

OTE Group operates responsibly throughout its value chain, aiming to stand as an example. In this framework, it applies and develops procedures, policies, tools, systems and mechanisms to manage issues regarding risks and compliance, human rights, business continuity, security and data privacy, as well as responsible procurement and supply chain.

### Employees

OTE Group provides a sustainable, efficient and technologically advanced working environment. It fosters a culture of growth, recognizes high productivity and offers equal and unlimited opportunities for development, while utilizing the potential of technology in education. The vision for an equal society for all and the values of Equality, Diversity and Inclusion, shape the Group's human resources policies and actions, contributing to the company's vision to create a better world for all. The Group encourages collaboration, open communication and the creation of a culture of innovation and growth, while putting in the center of its actions customer experience excellence. At the same time, the health, safety and well-being of its people remain a non-negotiable value for OTE Group. For this reason, it acts proactively, demonstrating competent reflexes, in order to quickly activate flexible response mechanisms in times of disruption (such as in the Covid-19 pandemic).



## Customers

The Group connects people, within a world of unlimited digital possibilities, aiming to increase everyone's quality of life. It is the largest investor in new technologies and infrastructure in Greece and the largest technology company in the country. At the same time, it develops innovative products and services, which contribute to the sustainable development, with environmental and social benefits for all.

## Society

OTE Group contributes to the development of digital skills of people of all ages, providing equal access to new technologies for all. OTE Group aims to make technology accessible to all, so as to reduce the digital divide and to gain equal access to the opportunities of the digital era. It conducts various social contribution and corporate volunteering initiatives, aiming to support vulnerable social groups, children, education, local communities, entrepreneurship, culture and sports.

## Climate and Environment

The Group aims for financial growth in accordance with environmental responsibility in all aspects of its performance. The most important objectives of the Group's environmental strategy are its contribution to climate change and the continuous integration of the circular economy principles into its activities.

The targets seek to minimize the environmental impact of its activities, on the development and provision of products and services, which allow the enhancement of productivity and protection of the environment in other sectors and on informing and raising awareness for its stakeholders.

## OTE Group & DT EU Strategy on Digital Inclusion and Environmental Protection

OTE Group Chairman and CEO Michael Tsamaz, took a leading role within the implementation of 2021-2024 DT Europe Segment ESG Strategy. With the vision to win in the market by becoming the customer centric and digital leader in Europe, DT Europe initiated 9 strategic priorities - scheme.

Among these 9 strategic priorities, sustainability has been placed in the focus. With the belief that sustainability on all levels (ESG) attracts not only investors and employees, but most definitely customers to the brand, it has been chosen as one of DT Europe strategic priorities.

OTE Group Chairman and CEO Michael Tsamaz, leads the way forward for DT Europe in making a "positive impact to society" in two main aspects: Digital Inclusion and Protecting the Environment.

In 2021, for the two focus areas of the DT EU ESG strategy, a common framework was set, certain ambitions and commitments were defined, accompanied by specific key performance indicators and qualitative & qualitative targets for the 2021-2024 timeframe.

### OTE GROUP CODE OF HUMAN RIGHTS AND SOCIAL PRINCIPLES

The OTE Group Code of Human Rights and Social Principles defines the behavioral rules in relation to human and social rights that all Group employees, investors and suppliers must abide and adhere to. By adopting it, OTE Group acknowledges and respects the diversity of all employees in terms of gender, age, culture, religion, competencies and sexual orientation, the right to freedom of association and collective bargaining, the prohibition of all kinds of forced labor and protects the health and safety of the workforce.

It has been developed in accordance with internationally recognized standards, guidelines, directives, norms and rules such as the International Bill of Human Rights and the Core Conventions of the International Labor Organization (ILO), the Organization for Economic Cooperation and Development (OECD) Guidelines, the UN Global Compact, the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) of the International Labor Organization and the guiding principles of the United Nations on Business and Human Rights.

### OTE GROUP SUSTAINABILITY POLICY

The OTE Group Sustainability Policy sets out OTE and its affiliates companies' management approach on sustainability/ ESG issues, as well as the areas which are impacted by relevant OTE Group requirements. This Policy defines the framework of the overall action plan implemented by the Group, taking into consideration current and future economic, social and environmental conditions, priorities and challenges. It lays out the sustainability governance structure within the Group by specifying the areas of responsibility and individual tasks and forms of cooperation among the Group's relevant sustainability bodies. The OTE Group Sustainability Policy was adopted in 2015, and was amended in 2022, in order to reflect the current national and international regulations, priorities and stakeholder's expectations concerning sustainability/ ESG issues.





### CONTRIBUTION TO THE UNITED NATIONS' SUSTAINABLE DEVELOPMENT GOALS

OTE Group companies participate in the UN Global Compact, a United Nations' initiative on sustainable development.

In September 2015, the United Nations adopted the 17 Sustainable Development Goals (SDGs). OTE Group has analyzed its impact to the SDGs throughout its value chain and has identified 7 SDGs that it mostly contributes to. These priority SDGs were linked to the Group's sustainability strategic pillars and actions.

SDGs WITH SIGNIFICANT CONTRIBUTION BY OTE GROUP





## Digital Transformation

OTE Group aspires to become the Digital Transformation leader in Greece and a role-model in South-East Europe. To achieve this goal, a holistic 360 Digital Transformation Program has been implemented and operates in the company, addressing the key areas of 3 activities: Customer, Network, Company, and an additional Simplification program launched as a key enabler for Digitalization.

### CUSTOMERS

- Each customer has a Mobile app and Digital ID to access and manage all his/her accounts and services with OTE Group.
- Numerous digital services via the digital touchpoints for customers (COSMOTE Insurance, Box, etc.).
- "COSMOTE NEO": Pure digital customer onboarding
- New customer service journeys which offer unique experience through all touchpoints (omnichannel).
- Personalized content tailored to the needs and wishes of customers.



### COMPANY

- Digital tools accessible from any device, anywhere to facilitate work and collaboration online.
- Simplification, unification, automation and cloudification of processes and functions.
- Creation of unified workflows without "digital gaps" to reduce paper and bureaucracy at work.
- Lean and agile ways of work.
- Lifelong employee training - as technology evolves, the needs and scope of work change.
- Growth and innovation mindset.

### NETWORK

- Decommissioning of legacy platforms resulting in more efficient energy use.
- Field technicians equipped with digital tools, for enhanced capabilities, reduced paperwork and improved scheduling.
- Predictive maintenance for minimizing service outages.
- Network workloads moving to the Cloud.



#### GREECE INDICATIVE ACHIEVEMENTS 2021

# 96%

PENETRATION OF COSMOTE MOBILE APP, WITH >3.7m USERS

# 75%

OF CUSTOMER BASE USING ELECTRONIC E-BILL, NEW EXPERIENCE WITH INTERACTIVE CAPABILITIES AND USER-FRIENDLY INTERFACE

# 43%

PENETRATION OF E-TOP UP SERVICES



#### ROMANIA INDICATIVE ACHIEVEMENTS 2021

# ~1m

USERS OF THE ONEAPP

# 75%

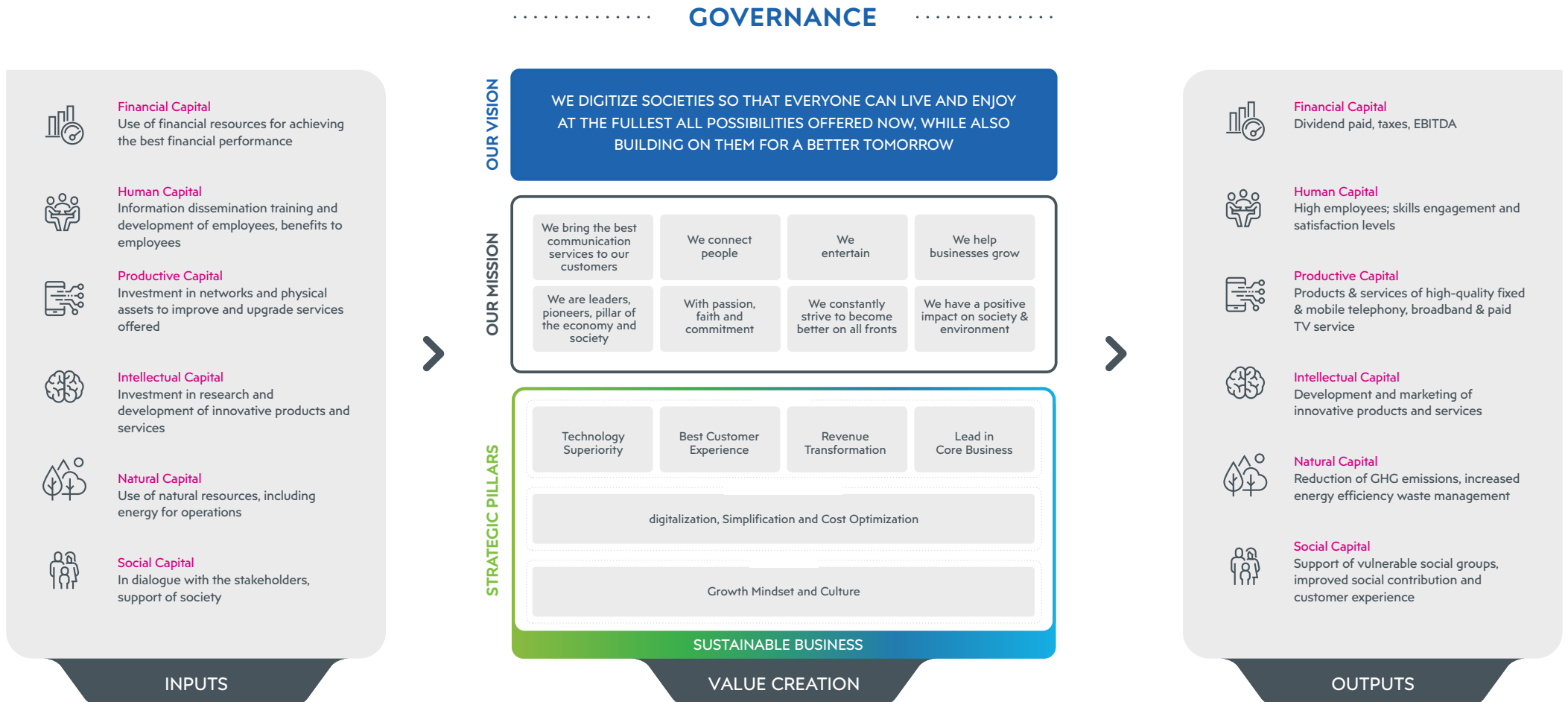
OF RESIDENTIAL CUSTOMER BASE ARE USING ELECTRONIC E-BILL

# 44%

OF THE B2B CLIENTS HAVE THE E-BILL ACTIVATED

## Business Model

The OTE Group business model aims to create value for its shareholders, its customers, the society, its employees and the environment. The Group continuously improves its products and services, offers new job opportunities, cooperates with a large number of suppliers, pays taxes to the state and contributes (financially and in kind) to society. In addition, it provides equal opportunities, facilitates access of vulnerable social groups to the digital world and takes measures to reduce its environmental footprint. At the same time, its products and services help customers reduce their environmental impact. The Group's efficient operation and high competitiveness lead to positive economic results, a fact that allows it to reinvest in the business so as to create more value for all its stakeholders in the short, medium and long term.



## OTE Group Strategy

OTE Group has set the path to transform into a modern Digital Telco by investing in Gigabit infrastructure and technology and becoming a digital leader in the ICT sector. The Group looks to make this transition by strongly embracing its strategic pillars, which encompass the Group's core sustainability principles, serving our purpose of creating a better world for all through technology.

### STRATEGIC PILLARS AND SUSTAINABILITY PRINCIPLES

#### TECHNOLOGY SUPERIORITY

We invest in the technological excellence of our networks and IT systems. We provide reliable fiber-optic connectivity to our customers through our Fiber-to-the-Home programs at Gigabit speeds. In 2021, OTE announced its €3bn investment plan until 2027, a drastic increase in order to bring FTTH to 3m households and businesses, leading Greece into a new, digital era. We are the first operator in Greece to launch 5G services at speeds exceeding 1Gbps, reaching 60% nation-wide coverage by the end of 2021. Through our networks, we foster the socio-economic development of the countries we operate in, assisting the transition to digital society and bridging the digital divide.

#### BEST CUSTOMER EXPERIENCE

Having our customers always at the center of our actions, we offer superior customer experience and make their everyday life digital, with more data and more digital solutions. Therefore, we strive to expand our digital, omni-channel solutions to address customer service requests, we cater for best-in-class uninterruptible service, as well as we inform them about the safe and responsible use of technology.

#### INNOVATION AND REVENUE TRANSFORMATION

The digital transformation of businesses and the public sector is one of our top priorities. We offer sustainable ICT products and services, enabling customers to improve their business's operation, competitiveness and prosperity, while reducing their environmental footprint. Our products and services contribute to climate change mitigation, the rational and efficient use of natural resources, and the reduction of waste generated.

#### LEAD IN CORE BUSINESS

We leverage on our strong brand, our fully fledged product portfolio and our sales network. We provide combined services, thus extending our customer base and safeguarding our customers from possible disruptors. We are able to achieve our leadership status by adopting responsible operation and business practices, capitalizing on our strong data security and corporate compliance policies, engaging with our stakeholders, as well as by embracing proactive governance and responsible supply chain management practices.

#### DIGITALIZATION, SIMPLIFICATION AND COST OPTIMIZATION

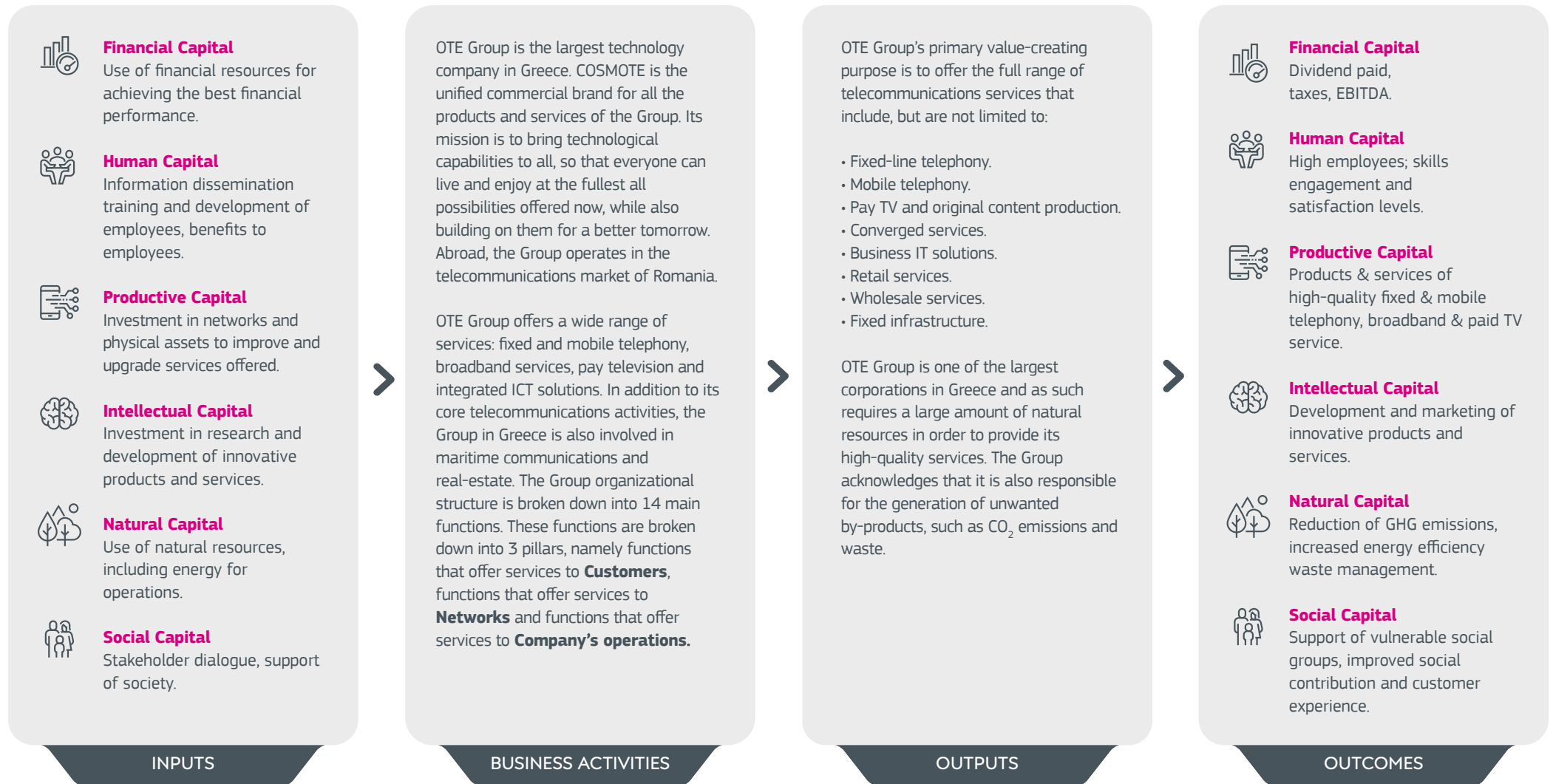
We transform our company into a modern, digital provider, by simplifying our products and IT architecture, optimizing our operating model, as well as by digitalizing our internal operations, thus fostering a sustainable lifestyle in a digital world. Through our efforts, we seek to reduce our environmental footprint and improve our energy efficiency.

#### GROWTH MINDSET AND CULTURE

We create an environment where people have impact and grow. To that end, we foster a culture of growth and innovation and we continuously upgrade our employees' digital skills through training programs leveraging the Group's digital e-learning platforms. We create a sustainable future for all, by creating a diverse and inclusive work environment, evaluating new working models (remote, agile, etc) and adapting to the new Corona new normal.

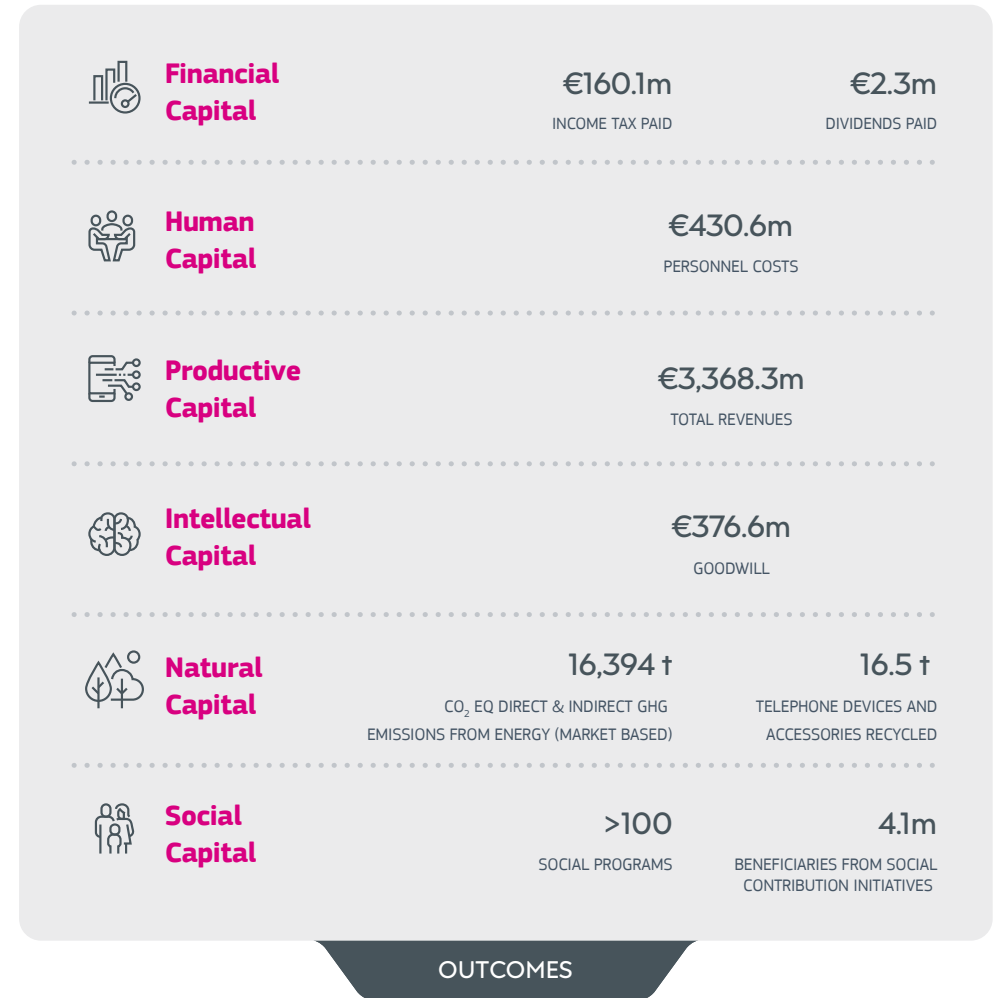
## Value Creation

OTE Group integrates its six capitals into its value creation process, developing smart, high-quality and inclusive ICT products and services, leveraging its innovative and leading technologies and practices. The Group capitalizes on its assets, skills and relationships, creating value for both external and internal stakeholders and laying the foundations for the Group's transformation into inclusive, responsible and sustainable Digital Telco.



## 2021 Value Highlights

In 2021, OTE Group achieved great success, recording remarkable results. Presented below are the Group's key figures, which showcase its performance



Note: The main categories of intangible assets are brand name, franchise agreements, software, TV broadcasting rights, concession rights



**Contribution to the United Nations' Sustainable Development Goals****GOOD HEALTH AND WELL-BEING**

Relevant key targets: 3.8, 3.c

**OTE Group's commitment**

To develop solutions for the more effective operation of nursing homes and e-Health, to participate in research projects relevant with health issues and support initiatives aiming at the improvement of the Greek health system. To support information and awareness-raising actions for responsible use of mobile phones while driving and ensuring a safe and healthy working environment, which promotes a culture of well-being.

**Key impact in 2021****3,575 EMPLOYEES**

trained on health/wellbeing and Safety issues, as part of the Group's efforts to safeguard its employees' well-being and prevent any form of mental and physical harm.

**>780 EMPLOYEES**

had the opportunity to be supported or receive helpful counseling from psychologists.

**~11,579 HOURS**

of training programs on health & safety issues.

**912 HOURS**

of psychological support consulting services were offered to the companies' employees and their family members who were experiencing mental problems inside or outside the workplace.

**QUALITY EDUCATION**

Relevant key targets: 4.1, 4.4, 4.b

**OTE Group's commitment**

To support education and digital skills' development programs for people of all ages and continue to invest in internal employee development, by offering access to digital learning platforms and designing custom made upskilling & reskilling programs.

**Key impact in 2021****19,459 PARTICIPATIONS**

of employees as part of OTE Group's training programs.

**17.74 HOURS**

of training per employee.

**€505,000**

awarded to 30 first year university students with financial and social difficulties as part of COSMOTE Scholarships program which has been running since 2002.

**5,552 PEOPLE**

participated in the Museum's educational programs and guided tours digitally and in-house at the Museum premises.

**Contribution to the United Nations' Sustainable Development Goals****AFFORDABLE AND CLEAN ENERGY**

Relevant key targets: 7.2, 7.3

**OTE Group's commitment**

To improve energy efficiency across its activities and especially in the provision of ICT services. To use 100% renewable energy sources for own electricity consumption.

**Key impact in 2021****100% OF ELECTRICITY CONSUMPTION**

covered by Guarantees of Origin

**€2.8m**

saved through energy conservation measures

**17.8 GWH**

of energy conserved

**30% IMPROVEMENT**

of energy consumption per volume of data transferred

**8.6 kt CO<sub>2</sub> eq**

of GHG emissions avoided through energy conservation measures

**DECENT WORK AND ECONOMIC GROWTH**

Relevant key targets: 8.2, 8.3, 8.5

**OTE Group's commitment**

To support its employees' professional development, provide equal remuneration to all employees without discriminating against race, gender or religion and support the development of new SMEs in Greece and Romania.

**Key impact in 2021****1,538 INTEGRITY CHECKS**

on suppliers, consultants and partners were carried out

**96% OF EMPLOYEES**

working at OTE Group, are covered by Collective Labor Agreements

**3% PAY GAP**

between men and women at the four of the largest companies of OTE Group in Greece (OTE, COSMOTE, GERMANOS and CTS)

**83 % AND 80%**

of OTE Group procurement from domestic suppliers in Greece and Romania respectively.

**Contribution to the United Nations' Sustainable Development Goals****INDUSTRY, INNOVATION AND INFRASTRUCTURE**

Relevant key targets: 9.4, 9.5, 9.C

**OTE Group's commitment**

To leverage on the Group's technological superiority, in order to create infrastructure that will provide internet and telecommunication services to the residents of the countries where it operates and foster growth in the local economies. To promote research and innovation, thus offering multiple benefits for its customers, employees and society.

**Key impact in 2021**

**560,000 FIBER-TO-THE-HOME (FTTH) LINES**

have been installed throughout Greece

**60% OF GREEK POPULATION**

is covered by COSMOTE 5G network

**99%/4G**

population coverage in Greece

**>90 PARTICIPATIONS**

in research programs

**RESPONSIBLE CONSUMPTION AND PRODUCTION**

Relevant key targets: 12.2, 12.5, 12.6

**OTE Group's commitment**

To integrate the principles of circular economy in its operations across its value chain. To develop products and services that contribute to the rational and efficient use of natural resources and the reduction of waste generated.

**Key impact in 2021**

**78% OF TOTAL WASTE GENERATED (3,619t)**

was recycled or reused

**261,500 END DEVICES**

were refurbished at OTE Group refurbishment plant (Greece)

**1.35m SINGLE USE PLASTIC ITEMS**

were refused (Greece)

**16.5t MOBILE DEVICES**

were collected and recycled

**18% REDUCTION**

in paper consumption per employee

**CLIMATE ACTION**

Relevant key targets: 13.2, 13.3

**OTE Group's commitment**

To contribute to the global efforts for climate change mitigation and adaptation. To reduce own carbon footprint and to develop products and services that that can tackle climate change.

**Key impact in 2021**

**88% DECREASE**

in Scope 1 and Scope 2 GHG emissions from energy consumption of OTE Group, compared to 2017

**17.8 GWh**

energy conservation

**100% ELECTRICITY**

from Renewable Energy Sources

**85% IMPROVEMENT**

of data traffic emissions intensity (market based)

## Key Achievements and Targets

Management's continuous goal for OTE Group, is to remain the market leader and pioneer, a modern, high-performance Digital Leader who offers best customer experience based on its technological superiority.

More specifically, the aspiration of OTE Group is to:

- Remain the undisputable market leader in Fixed, Mobile and Convergent markets.
- Safeguard its leading position in Broadband (both Fixed and Mobile), ICT and Pay-TV services in the Greek market.
- Further grow in adjacent markets (COSMOTE Insurance, BOX, COSMOTE Payments) and enter new ones, capitalizing on its strong digital capabilities and ecosystem.
- Deliver best services to customers, leveraging on the technological superiority of its Next Generation Networks (FTTH, 4G+/ 5G).
- Offer superior customer experience, utilizing modern digital channels (App, COSMOTE NEO, etc.).
- Advance with the transformation of its own operating model towards a leaner and more agile structure, capitalizing on digital transformation and the flexibility of its new spin-off subsidiaries.
- Be the best place to work in the Greek market, develop its personnel and attract digital talents.

- Increase the value of its shareholders.
- Maximize synergies as a member of Deutsche Telekom Group.
- Have a positive impact on the society and the environment, by mitigating climate change and promoting circular economy and digital inclusion.

### Key Objectives of 2022

OTE remains committed to sustainable and profitable growth. For 2022, the Group besides achieving the annual business targets will also seek to enable its long term evolution. Special focus will be put on the proper execution of its accelerated FTTH plan, the advancement of its 360° Digital Transformation plan (for Customer-facing and intra-Company processes), the continuous enhancement of Customer Experience, the transformation towards a leaner, more flexible and agile operating model, as well as the operationalization of Group synergies within the Deutsche Telekom Group.



OTE REMAINS COMMITTED  
TO SUSTAINABLE AND  
PROFITABLE GROWTH

**KEY STRATEGIC PILLARS AND ACTIONS FOR 2022****TECHNOLOGY SUPERIORITY**

- Accelerate Optical Fiber Networks deployment ~1m HH passed by 2022YE.
- Reach 80% population coverage in 5G
- Digitalize Network Field tasks
- Improve IT systems

**BEST CUSTOMER EXPERIENCE**

- Digital Transformation @Customer:
  - Omni-channel
  - Extended functionalities in apps
  - Service enhancements in O2B and F2R.
- Push Online Sales
- Load Reduction in front-line
- Digital predictive maintenance @Network

**INNOVATION AND REVENUE TRANSFORMATION**

- ICT projects
  - Public & Private sectors; EU projects
  - Cloud solutions
  - IoT - Smart Cities - Verticals
- Develop COSMOTE Insurance, BOX, COSMOTE Payments

**LEAD IN CORE BUSINESS**

- Leverage COSMOTE brand superiority
- Upgrade customers to double speeds in Fixed Broadband, offer more data on Mobile
- Enhance FMC and FMCC propositions
- Develop COSMOTE TV OTT
- Wholesale Fiber Monetization

**DIGITALIZATION, SIMPLIFICATION AND COST OPTIMIZATION**

- Lean, efficient and agile operating model (spin-offs, outsourcing)
- Digital Transformation @Company and @Network
- Cost efficiency programs
- Synergies with Deutsche Telekom Group

**GROWTH MINDSET AND CULTURE**

- Evaluation of new working models (Agile, Work from home)
- Re-skilling/ Upskilling in new digital skills
- Establish a culture of growth and innovation

**SUSTAINABLE BUSINESS**



## OTE GROUP | KEY ACHIEVEMENTS AND TARGETS

**2021  
ESG TARGETS**

OTE Group companies set goals to improve their operations, develop programs and actions in order to achieve them, monitor their progress, and communicate their performance.

The strategic targets are approved by the top management and are then distributed throughout the Group, in the form of individual objectives for each organizational unit and activity.

In the 2020 Integrated Report, **27 annual targets were presented for OTE Group companies**. The targets were qualitative and quantitative, covering different functions, and were subsequently implemented by the competent units. Of these, 93% have been fully or partially achieved or are in progress of doing so, reflecting the ongoing effort to improve the Group's sustainability performance.

.....

The companies' performance per target is presented in the [Appendix](#).

**2022  
ESG TARGETS****ENVIRONMENTAL****Energy and Climate Change**

**OTE Group:** OTE Group is committed to participate fully towards the achievement of the DT Group wide net zero targets that aim at:

- 100% coverage of electricity consumption with electricity generated from renewable energy sources from 2021.
- Net zero scope 1 and scope 2 GHG emissions from energy consumption by 2025, including up to 95% reduction of emissions from energy consumption by 2025 compared with 2017 (base year).
- 25% reduction of value chain (scope 3) emissions per customer by 2030, compared with 2017 (base year).
- Net zero GHG emissions (scope 1, 2 and 3) at the latest by 2040.

**Resource Efficiency****Sustainable Waste Management**

**OTE Group:** Zero ICT waste<sup>1</sup> to landfill (2022 onwards).

**OTE Group Greece:** Reach 400,000 mobile devices<sup>2</sup> from take-back schemes by 2024.

**Sustainable Packaging<sup>3</sup>**

**OTE Group:** 100% sustainable packaging for own branded newly launched (by the 2nd semester 2022) end devices.

**Zeroplastic**

**OTE Group Greece:** Retain the elimination of single use plastic items<sup>4</sup> in major buildings in 2022.

**Paper Reduction**

**OTE Group Greece:** 25% reduction of paper use in 2023 vs to 2020.

**Other Environmental**

**COSMOTE:** Installation of 2 additional EMF measurement stations.

1. Waste generated from telecom & retail network, buildings and datacenters

2. Smartphones, Simple Phones, Fixed Phones (wired and cordless), Notebooks/Laptops, Tablets, Wearables, Chargers/Powerbanks & Accessories

3. Non- applicable target for Telekom Romania Mobile Communications

4. Plastic bottles, cups, straws, food containers & single use cutleries

OTE GROUP | KEY ACHIEVEMENTS AND TARGETS

**SOCIAL**

Employees

**OTE Group Greece:** Focus on skill transformation and developing a digital learning culture - Digital Learning Quota YE 2022: 70%

**OTE, COSMOTE, CTS, GERMANOS:** Focus on skill transformation and developing a digital learning culture - Introduce Future Skill Management within 2022

**OTE Group:** Bring the Group-wide health rate<sup>1</sup> up to 98% by 2022

**OTE, COSMOTE, CTS, GERMANOS:** Reduce the total number of work-related accidents (vs 2021).

**OTE Group Greece:** Further promote Diversity, Equity & Inclusion within OTE Group, through targeted actions for all employees and leaders (Mentoring Program for Women, dedicated e-learning for all employees)

**OTE- COSMOTE:** Design the agile organization, define the respective Roles & Interconnections. Create an agile working culture and adapt the people model to the agile operating model by 2023 (in scope Commercial functions).

Customers

**OTE-COSMOTE:** Offer the capability to sell our services remotely through our digital channels, without physical human interaction by 2023.

**OTE-COSMOTE:** Increase Digital Self-Care Penetration in order to provide an interactive and effortless Customer Experience that would enable customers maximize the value they get from our products/services (customer success) by 2023.

Society

**OTE Group Greece:** Impact approximately 15m peoples' lives through digital inclusion initiatives by 2024 (from 2021).

**OTE-COSMOTE:** Enhance training programs for improvement of STEM skills for children within 2022.

**GOVERNANCE**

Responsible Business

**OTE Group:** Development of KRIs (Key Risk Indicators) in order to define tolerance levels by 2024.

**OTE Group:** Increase awareness of employees via e-learning on Risk Culture / Risk Management by 2023.

**OTE Group:** Integration of Business Units' Risk Assessments results into the TRMS Tool (Telekom Risk Management Solution), aiming at a systematic analysis and structured monitoring of corporate risks, and within the framework of the Integrated Management System (IMS) by 2027.

**OTE Group:** OTE (and / or an affiliated company) to apply for the "World's Most Ethical Companies" award within 2022.

**OTE Group:** Increase awareness of employees and business partners on compliance issues (eLearnings on Code of Conduct and Anticorruption, Top Management Compliance Training, awareness to business partners on OTE Group Principles, the OTE Group Compliance Management System and the related Codes) by 2023.

**OTE Group:** Conduct human rights risk and impact analysis at OTE/COSMOTE affiliated companies within 2022.

Security and Data Privacy

**OTE-COSMOTE:** Completion of Phase 2 of the Schrems II project within 2022

**GERMANOS:** Completion of external audit for ISO 27701 within 2022.

**OTE-COSMOTE:** Completion of data deletion implementation review within 2022.



1. Health rate: The ratio of the percentage of working days when no absences due to illness need to be recorded in relation to the target working days in the analysis period. Includes all sicknesses (excluding pregnancy, including sickness due to accidents)

## Risks and Uncertainties for the Next Year



OTE GROUP CONTINUALLY ASSESSES THE POSSIBLE IMPACT OF ANY CHANGES IN THE MACROECONOMIC AND FINANCIAL ENVIRONMENT IN GREECE

so as to ensure that all necessary actions and measures are taken in order to minimize any impact on the Group's operations in Greece.

OTE Group has developed and applies an Enterprise Risk Management System, which is certified as per ISO 31000:2018, and supports Management in its strategic decision-making, in order to safeguard its smooth operation and future corporate success. This is achieved by identifying, evaluating, communicating and addressing enterprise risks, including sustainability and conflicts of interest risks, utilizing all strategic and operational risk mitigation, and monitoring relevant measures

taken by the Group, in order to avoid risks and seize future opportunities.

In 2020, OTE Group conducted a new materiality analysis in order to identify the Group's most significant sustainability issues with the participation of OTE Group's Senior Management and the engagement of its stakeholders. The materiality analysis constitutes an important component of the stakeholder dialogue and of understanding stakeholders' expectations. At the same time it contributes to identifying and

analyzing current and future developments, trends, opportunities, risks and stakeholder requirements relating to sustainability and ESG matters by taking into account the Group's unified Enterprise Risk Management methodology. The compliance risk assessment process was integrated in the materiality analysis process.

The materiality analysis is conducted periodically, it is an analysis of material issues and is based on the unified Enterprise Risk Management methodology on significant strategic, financial, operational, environmental, reputational and social aspects, which may have influence on (and/or may be influenced by) the decisions of the

**OTE GROUP | RISKS AND UNCERTAINTIES FOR THE NEXT YEAR**

Group, taking into account the expectations of the Group's stakeholders.

The Board of Directors and the Management of the OTE Group continually assess the possible impact of any changes in the macroeconomic and financial environment in the countries where the Group operates, so as to ensure that all necessary actions and measures are taken in order to minimize any impact on the Group's operations. Based on its current assessment, it has concluded that no additional impairment provisions are required with respect to the Group's financial and non-financial assets as of December 31, 2021.

This section outlines the key risks and uncertainties for the next year. A full list of OTE Group's identified risks and their respective detailed mitigation practices are presented in the [2021 Annual Financial Report](#).

**Pandemic Crisis; COVID-19**

The Covid-19 pandemic continued in 2021 as well. During the first quarter of 2021, due to the rise of corona virus cases that began from Christmas holiday period of the previous year, the application of restrictive measures in Greece continued being active. So, OTE Group continued to implement a targeted action plan in order to ensure avoiding unpleasant consequences from Covid-19 pandemic. Official measures began to be lifted gradually from mid-April 2021. In early May, a gradual relaxation of the quarantine's restriction measures began. During summer period, office occupancy rate extended to 70% on rotation and



based on business needs and 30% teleworking from home. Front Line Units (Shops and Field Technicians) were working at full capacity, as well as Logistics/Warehouse employees in shifts and employees with health issues were working full time remotely. In December, OTE taking into account the upcoming rapid spread of SARS-CoV-2 Omicron variant applied an updated protocol regarding quarantine and isolation of employees and followed specific recommendations in accordance with National Public Health Organization (NPHO). Throughout the pandemic, the Company continually operates according to the guidelines and decisions of all relevant agencies, adhering to the requirements and action plan endorsed by the Greek authorities.

OTE continued using all digital channels and taking a series of precautionary measures. These measures concerned remote work scheme, provision of healthcare supplies, provision of specialized Personal Protective Equipment for technicians and activation of immediate communication channels for consultation on health issues and psychological support at all

employees' disposal (for more information, please refer to section "Health and Safety in the workplace" below).

Despite the particularly increased daily data traffic in fixed and mobile networks, OTE's networks continued responding to the higher demand. Moreover, the Company's risk assessments on potential stock shortages of devices/equipment detected no exposure.

The extent to which OTE will be affected by Covid-19 in the upcoming quarters will largely depend on future developments of the pandemic.

**Macroeconomic conditions in Greece**

Management continually assesses the possible impact of any changes in the macroeconomic and financial environment in Greece so as to ensure that all necessary measures are taken in order to minimize any impact on the Group's Greek operations. Based on its current assessment, it has concluded that no additional impairment provisions are required with respect to the Group's financial and non-financial assets as of December 31, 2021.

**Financial Risks**

The below stated risks are significantly affected by the macroeconomic and financial environment in Greece.

**Credit risk**

Credit risk is the risk of financial loss to the Group and the Company if a counterparty fails to meet its contractual obligations.

The carrying value of financial assets at each reporting date is the maximum credit risk to which the Group and the Company are exposed in respect of the relevant assets.

Financial instruments classified as fair value through profit or loss include mutual funds. These financial assets are not considered to expose the Group and the Company to a significant credit risk.

Defaulted payments of trade receivables could potentially adversely affect the liquidity of the Group and the Company. However, due to the large number of customers and the diversification of the customer base, there is no concentration of credit risk with respect to these receivables. Concentration of risk is however considered to exist for amounts receivable from other telecommunication service providers, due to their relatively small number and the high volume of transactions they have with the Group and the Company. For this category the Group and the Company assess the credit risk following the established policies and procedures and recognizes the appropriate provision for impairment.

The Group and the Company have established specific credit policies under which customers are analyzed for creditworthiness and there is an effective management of receivables in place both before and after they become overdue and doubtful. In monitoring credit risk, customers are

**OTE GROUP | RISKS AND UNCERTAINTIES FOR THE NEXT YEAR**

grouped according to their business group, their credit risk characteristics, aging profile and existence of previous financial difficulties, also adjusted for forward-looking factors specific to the customers and the economic environment.

Taking into consideration the impact of COVID-19, the Group and the Company have also incorporated in the provision for expected credit losses the increase in credit risk for customers whose business is negatively affected and for those whose payment profile indicated a greater risk.

Group's cash and cash equivalents are mainly invested in highly rated counterparties and with a very short term tenor.

Loans include loans to employees, which are collected either through the payroll or are netted-off with their retirement indemnities, and loans to the pension fund related to prior years voluntary leave schemes. The latter loans are exposed to credit risk related to the debt servicing capacity of the pension fund.

**Liquidity risk**

Liquidity risk is the risk that the Group or the Company will not be able to meet their financial obligations as they fall due. Liquidity risk is kept at low levels by ensuring that there is sufficient cash on demand and / or credit facilities to meet the financial obligations falling due in the next 12 months. The Group's and the Company's cash and cash equivalents and other financial assets as at December 31, 2021 amount to €636.3m and €277.0m respectively and their short-term portion of long-term borrowings amounts to €397.3m and €374.2m, respectively.

The full list of financial risks together with their mitigation practices are outlined in the [2021 Annual Financial Report](#).

**Critical infrastructure failure**

For all telecom operators, the Information and Communication Technologies (ICT) infrastructure is considered as the backbone of their operations. Given the variety and diversity of contemporary services provided by all telecom operators, the complexity of the ICT infrastructure and the interdependencies between various network nodes and service platforms, are unprecedented. Thus, technical infrastructure outages, due to either external factors (e.g. earthquake, flooding, etc.) or internal factors (e.g. power and air-conditioning outages, human error, etc.) cannot be ruled out. Consequently, service disruptions might appear that could result in potential revenue losses, increased rehabilitation and/or potential customer compensation costs, and consequential effects on customer base and Company's reputation.

OTE Group, in order to ensure the seamless continuation of its business operation, has already established processes, Continuity & Recovery plans as a robust Business Continuity Management System demands and has been certified by ISO 22301:2019. In this context, recovery programs for both the telecommunications network and the IT infrastructure are already in place. Business Continuity Subdivision OTE Group, in cooperation with Network Automation, Security & Operations

Support Subdivision Fixed & Mobile and IT Service Continuity & Risks Subdivision Fixed & Mobile test and rehearse the recoverability & operability of the critical business processes. The resilience of the telecommunications network has been further enhanced through the gradual introduction of new technologies.

Furthermore, power availability at critical sites is constantly monitored and enhanced. Two of the main Network and IT Data Centers were awarded with a Tier III-category certification by the Uptime Institute. Improvement works of Electro-Mechanical infrastructure ("Dual Feed" project) of network critical infrastructure sites took place.

Uninterrupted provision, to DT Group, of Value Added services is safeguarded by critical infrastructure's high availability along with application switch over or diversion to alternative Data Center.

See [Business Continuity](#) section for more details on the Group's actions.

**Information security**

Being faithful to the commitment of adapting swiftly to the evolving needs of the new digital era, OTE Group places emphasis on new strategy and business models, utilizes digital capabilities to the benefit of its customers, employees, partners and suppliers, and continuously innovates, providing a wide range of services and cutting-edge technology, such as 5G and Fiber to the Home.

The ever-changing technological environment and the increased regulatory requirements towards the security of network and information systems, reinforce the existing cybersecurity challenges and create new ones, by growing in complexity and risk. OTE Group provides a wide range of products and services, and delivers integrated ICT solutions, including services to well-established customers and public organizations, keeping cybersecurity at the forefront. The Company embraces a holistic approach to cyber security, balancing the need to protect itself from risks and ensure that right levels of protection are in place with the need for business innovation.

To maintain a high level of network and information security across the Company and ensure that cybersecurity touches all facets of its activities, OTE Group, through the Information Security and Telecommunication Fraud Prevention Division, implements a robust security strategy, demonstrating its commitment and the key actions it takes to stay ahead of the threat landscape. By applying a structured approach to security risk management, the Division establishes and implements the required set of security policies, procedures and practices, oversees their implementation, designs robust security mechanisms, systems and infrastructure, and evaluates their effectiveness (e.g. via periodic system audits). In addition, the OTE Group Cyber Defense Center of the Division collects and analyzes data from corporate systems on a 24/7 basis, in order to timely detect security incidents (e.g. cyber-attacks) and respond effectively.



## OTE GROUP | RISKS AND UNCERTAINTIES FOR THE NEXT YEAR

Ensuring security of information and communication systems is always one of OTE Group's top priorities. It is more than just an obligation to meet statutory and regulatory requirements; it is also part of the Company's culture and enhances its competitive advantage in maintaining the trust of its customers, partners and suppliers.

See [Security and Data Privacy](#) section for more details on the Group's actions.

## Data protection

The Company collects, stores and uses personal data, in the ordinary course of its operations, and protects them according to the data protection legislation and the Binding Corporate Rules Privacy (BCRP) for the protection of personal rights in the handling of personal data within the Group, which have been adopted by the BoD of the Company. Although technical and organizational measures are implemented to protect personal data, measures may fail and certain personal data may be lost as a result of human error or technological failure or otherwise be used inappropriately. Data breach by the Company or one of its partners or suppliers may result in fines, reputational harm and subscriber churn and could have a material adverse effect on the business and its financial condition.

Data protection is one of OTE Group's top priorities; it's more than just an obligation to meet legal and regulatory requirements, it's also an integral part of the Company's culture. In this context, OTE Group has established the Data Privacy unit OTE Group, headed by the Data



Protection Officer, who is operationally supervised by the Audit Committee.

Technical and organizational measures implemented by the Company include, inter alia, measures to prevent unauthorized persons from accessing data processing systems, measures to ensure the confidentiality of data at rest and in transit (e.g. encryption, pseudonymization), measures to ensure that personal data processed by third parties / contractors are processed only in accordance with the Company's instructions, as well as periodic employee awareness and training activities.

See [Security and Data Privacy](#) section for more details on the Group's actions

## Climate protection

Climate change is a global environmental issue, the impacts of which affect the whole range of economic activities as well as numerous other aspects of life on the planet and could lead to emerging risks, due to its severe and long-term impacts. On the one hand, low environmental performance could affect the Group's reputation and market share, as surveys indicate that consumers and investors tend to engage with companies that have an effective environmental policy in place. On the other hand, in the long term, telecommunications infrastructure could be affected by extreme weather events (physical impacts) that can lead to network disruptions.

Aiming at climate change mitigation, EU has set its target the reduction of Greenhouse Gas (GHG) emissions by at least 55% by 2030, compared to 1990 levels. In the context of the European Green Deal, EU aims at zero net emissions by 2050, which is now legally binding with the adoption of the EU Climate Law.

In July 2021 the European Commission released a series of legislative proposals (Fit for 55) setting out how it intends to achieve its climate targets. Moreover, the European Commission is in the process of establishing through its Taxonomy Regulation and its delegated acts criteria for determining whether an economic activity qualifies as environmentally sustainable for the purposes of establishing the degree to which investing in it is also environmentally sustainable. Following along these lines, in November 2021, a public consultation process was initiated on the Greek Climate Law that aims to provide the framework for Greece to also achieve an 80% reduction by 2040 on the way to a net-zero emissions target by 2050.

Addressing climate change is fully in line with OTE Group's overall environmental strategy which comprises three areas, namely:

- minimizing the environmental impact of its activities,
- developing and providing products and services that enable increased productivity and environmental protection in other sectors of economic activity, and
- reinforcing its stakeholders' environmental awareness.



**OTE GROUP | RISKS AND UNCERTAINTIES FOR THE NEXT YEAR**

To this end, OTE Group is committed to participate fully towards the achievement of the DT Group wide net zero targets (climate neutrality), announced in early 2021, of:

- Net-zero of direct and indirect GHG emissions (scope 1&2) from energy consumption by 2025, including up to 95% reduction of emissions from energy consumption by 2025 compared with 2017.
- 100% coverage of electricity consumption with electricity generated from renewable energy sources by 2021 and onwards.
- 25% Emission reduction per customer for value chains emissions (scope 3) by 2030 compared with 2017.
- Net zero GHG emissions (scope 1, 2 and 3) at the latest by 2040.

Energy consumption is a major source of GHG emissions in OTE Group contributing to climate change (and air pollution), and affects the operational cost of OTE Group, which is also directly related to the regulated charges of the national electricity transmission and distribution system, and may also be influenced by:

- Increases due to the fees / levies / burdens imposed on the electricity generation sector in the context of the EU emissions trading scheme (indirect regulatory risk).
- Stricter environmental regulations with mandatory provisions (e.g. energy audits of activities, heating / cooling systems, etc.).
- Increases in fossil fuel prices.

Taking into consideration all the above, OTE Group inventories annually all direct and indirect

emissions (scope #1, #2 and #3) arising from its operation and endeavors to reduce them. In this, OTE Group has initiated a number of actions for the reduction of energy consumption (and corresponding emissions), thus minimizing relevant risks and enabling, in the long term, its adaptation to climate change. These actions, among others, include:

- Air-Condition temperature set-point / Automation.
- Telecom Rooms Consolidation.
- Legacy Networks Power off.
- Infrastructure Modernization / Optimization.
- Free Cooling.
- Energy Audits at Telecom Rooms.
- Mobile Modernization.
- RAN Energy Features – Deactivation of capacity layers in low traffic periods.
- Fuel saving measures, with hybrid solutions at off grid sites.
- Measures to improve the efficiency in data centers.
- Energy upgrade of buildings' shell.
- Energy-efficient design of renovated buildings and shops and installation of new energy-efficient equipment and LED lighting systems.
- Automation in lighting systems, air conditioning, generators etc. and monitoring of energy consumption.
- Energy audits to identify measures to improve the performance of the equipment installed.
- Office space consolidation.
- BMS/ BEMS systems and energy management of installations in accordance with the ISO 50001 Standard.

- Environmental certification of building installations according to internationally recognized standards.
- Fleet upgrading with new technology vehicles of lower emissions and improved energy efficiency engines.

See **Energy and Climate Change** section for more details on the Group's actions.

### Supply chain

OTE Group believes that the diffusion of key values and standards in the supply chain is an important feature of responsible business conduct. The development and maintenance of a value-added supply chain for the Group, with economic, environmental and socially responsible methods and practices, in line with the Group's vision, is a continuous target for improvement.

However, there are risks that may potentially cause business operational failures, revenue losses, reputational damage as a result of third party/vendor actions (environmental damages, inadequate working conditions, child labor, fraud, etc.).

See **Responsible Purchasing and Supply Chain Management, Stakeholder Management & Engagement** section for more details on the Group's actions.

### Health risks related to Electromagnetic fields (EMF)

The potential health effects of man-made sources of electromagnetic radiation fields (EMF) have attracted particular attention in recent years. For this reason, international scientific organizations have established safe limits of exposure to non-ionizing (EMF) radiation and a relevant legislative framework has been developed.

Research carried out and evaluated by the World Health Organization does not show any correlation between health and impact of electromagnetic emissions from telecommunication stations operating below the established EMF exposure safety limits. Furthermore according to measurements by independent organizations, the values of EMF attributed to telecommunications base stations, contribute less than 30% of the total electromagnetic background in the residential areas. The electromagnetic field levels in all OTE Group base stations comply with the limits recommended by the World Health Organization and the International Commission for the Protection of the Non Ionizing Radiation Protection (ICNIRP), as well as with the limits set by law 4635/2019, which are at 60-70% of the ICNIRP limits [establishing the limits, the scientific community has set a safety factor of fifty (50), considering that some population groups may be more vulnerable] at free public access points. In general, OTE Group's policy is based on the application of the Precautionary Principle, which incorporates also the principles of Transparency,

**OTE GROUP | RISKS AND UNCERTAINTIES FOR THE NEXT YEAR**

Information, Participation and Promotion of Science, for all its products and services.

In 2020, ICNIRP published the new guidelines for protection against exposure to electromagnetic radiation. According to ICNIRP's new international guidelines, after more than 20 years of research, the security of mobile networks is confirmed for everyone, including children, when the recommended exposure limits are met. ICNIRP notes that: "The most important thing for people to remember is that 5G technologies will not be able to cause harm when these new guidelines are adhered to".

See **Communication with Customers** and **Electromagnetic Fields** sections for more details on the Group's actions.

## Health and Safety in the workplace

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Multiple work – related risk factors are considered to be hazardous for the Health and Safety of employees, especially for the technical staff (such as Field, Net and PCP technicians; linemen; electricians; warehouse personnel; etc.). An unsafe working environment, may burden the Company with compensation liabilities and other legal costs, while hurting the Company's reputation and business continuity.

According to the inspections of the risk assessments conducted by the Health and Safety business unit and regarding the consequences of the existing hazards is revealed that the most significant

workplace hazards are that the technical staff is exposed to the following:

- Improper use of Personal Protective Equipment (P.P.E.), which aims to reduce the severity of injuries.
- Underground work, which is performed for the purposes of repair or maintenance of equipment. An underground construction site is a narrow space with stagnant (dirty) water, and it could be a source of infections, especially if the worker does not use his P.P.E. properly.
- Work on poles, can also lead to accidents, especially if the worker uses his P.P.E. improperly or not at all.
- Use of ladders for repair or maintenance purposes, which are located wrongly.
- Improper or unsafe use of hand tools, which are used during work.
- Non – continuous implementation of the guidelines for safe works, which are communicated in multiple ways for each individual work.

See **Health and Safety** section for more details on the Group's actions.

## Compliance, Corruption, Bribery and Human Rights

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Compliance stands for a solid commitment to the principles of integrity, transparency, justice, professionalism, team spirit, and of respect to the rules, principles which are essential to govern the functions of the Company.

Compliance violations [e.g. fraud, corruption, bribery, embezzlement, theft, money laundering,

falsification of financial statements (company/ separate and consolidated), unfair competition, workplace discrimination, human rights violations and any misconduct which could harm the Company's reputation, or any attempts to conceal the above] which are committed either within the Company or outside the Company involving business partners (e.g. customers, suppliers or distributors) who are doing business with the Company, could have an adverse impact on the Company's financial position and reputation and might lead to fines, sanctions and limitations in business operations. We note that the OTE Group companies take all the required measures in order to ensure that the whistle-blowers who report incidents of misconduct by providing accurate information that is plausible, will be protected from any retaliation resulting in personal, professional or financial damage.

In order to avoid risks of non-compliance with the legislation in force as well as other legal consequences for the Company and its Employees, the Management has adopted and implemented a Compliance Management System (CMS), in the framework of which the Management has also adopted a Whistleblowing Process ("Tell Me") and the relevant communication channels.

Moreover, in the context of the System's implementation, OTE Group Codes and Compliance Policies have been adopted in order to cover important operations and procedures of the Company, including, inter alia, the Code of Conduct, the Code of Human Rights and Social Principles, the Diversity, Equity and Inclusion



Policy, the Supplier Code of Conduct, the Policy on Avoiding Corruption and other Conflicts of Interest, the Anti-Fraud Policy, the Policy on Accepting and Granting of Benefits, the Donation Policy, the Sponsoring Policy, the Policy on Anti-Trust Law as well as the Policy on Insider Trading.

Failing to adopt and implement adequate and robust processes that prevent corruption, bribery and human rights issues and violation can result in harming OTE Group's reputation, thus possibly subsequently affecting its financial position as well as its employees' commitment and loyalty.

## OTE GROUP | RISKS AND UNCERTAINTIES FOR THE NEXT YEAR

Therefore, OTE Group recognizes corruption, bribery and human rights violations as an emerging risk, given the uptake of domestic and international regulation on these issues. As such, OTE Group has established effective policies and procedures (such as whistleblower procedures) for the prevention, identification and handling of possible cases.

See [Compliance Management](#) section for more details on the Group's actions.

### Critical Enterprise Contracts and Business Resilience

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Associated advances and continuous changes in technology make telecommunications services even more critical for small, medium and large businesses (e.g. cloud, mobile, fixed technologies and solutions). This market segment requests from telecom providers a higher level of customer service in order to support these advanced and personalized solutions. Competition is focused

mostly on innovative services and it depends heavily on the ability to deliver products and services in a reliable and timely manner.

OTE Group aims to ensure the maintenance and improvement of existing networks and installations, upgrade existing systems and adapt new technologies, in a manner that minimizes business interruption and contributes to business resilience, in order to provide customers with high quality and innovative services. In addition, OTE Group has adopted and implemented proactive

and reactive mitigation measures in order to ensure the continuation of operations. A failure to deliver these high-value and complex services on a continuous and uninterrupted basis may lead to revenue reduction and increase of restoration costs (e.g. ICT disruptions, Network and IT infrastructure failures, etc.). Each of these events might have an adverse impact on the level of customer experience and satisfaction as well as on the company's reputation.

See [Business Continuity](#) section for more details on the Group's actions.

# Resilience & Response to COVID-19



## Business Model

In the midst of the financial and social difficulties that arose during the second year of the pandemic, and with a high sense of responsibility towards society and its people, OTE Group proceeded in 2021 to the implementation of a coordinated plan for this new reality, while implementing the state guidelines.

The Group's main priority, from the very first moment, remained the safeguarding of the health safety of its people, and their families,

especially those with health issues, with emphasis on employees who work in the front line (shops and field technicians). At the same time, despite the adverse conditions created by the pandemic, the company's goal remains the uninterrupted operation of the telecommunications network and the continuous and seamless customer service.

When returning to the new normal, while ensuring business continuity and compliance with the safety measures in place, teleworking remained in 2021 at approximately 30%, where the nature

of the role allowed it. For the employees who, due to their work role, continued to come into contact with customers (employees in stores and in the field), the Group took all the necessary protection measures and provided, at all times, the necessary equipment, such as protective masks and gloves, as well as special protective suits, when required.

Finally, both the Legal and the Data Security department, ensured the resolution of any issues that may arise regarding access to systems, network security and company data.

## Employees

During the second year of the COVID-19 pandemic, OTE Group maintained strong reflexes, taking advantage of the mechanisms it had developed and implemented since the beginning of the health crisis, in order to safeguard the health, the safety and the well-being of its people.

Through various actions, the company maintained the appropriate working conditions and safeguarded the well-being of his people. Indicatively:

- Health & Safety department developed specialized programs, so as to provide updated and valid information, support, prevention and protection to all employees. For their most part, these programs were conducted digitally. The benefits were multiple, since all employees

nationwide, as well as their family members, could participate.

- The company also provided improved digital learning programs, through digital learning platforms, offering unlimited and flexible participation to all OTE Group employees.
- Finally, upgraded mobile packages were provided to all employees, with zero charges to all destinations.

The "COVID-19 OTE Group Crisis Management Team", which was created at the beginning of the pandemic, for the optimal coordination of all necessary actions during the health crisis, continued to operate in 2021. Furthermore, the company implemented an internal "COVID-19 Case Management Process", so as to address all suspicious or positive COVID-19 cases, which occurred within OTE Group. The aforementioned process is adapted according to the circumstances, taking into account the continuous changes in the epidemiological data (disease levels, vaccinations, mutations of the virus etc.).

The dedicated Health & Safety hotline, which operated since the beginning of the pandemic in March 2020, received, throughout 2021, more than 21,500 calls from employees, nationwide.

Finally, OTE Group put special emphasis on continuous communication to all employees (through direct emails, posters, articles on the company's intranet), with updated info for COVID-19.

# Stakeholder Management & Engagement

## OTE GROUP RECOGNIZES THAT ITS STAKEHOLDERS HAVE A DIRECT IMPACT AND INFLUENCE

on its sustainable development, its operation and on the attainment of its business objectives, while at the same time they are affected by the Group's activities. The Group is continuously engaged with the stakeholders' representatives without exclusions and discrimination.

Aiming to establish a mutual and effective communication with its stakeholders, OTE Group identifies the stakeholders who significantly affect and/or are affected by its business activities, in accordance with its values, principles, strategy, and activities and taking into consideration society as a whole.

OTE Group has identified 9 primary stakeholder groups as presented as follows:

- Shareholders, Bondholders, Investors and Analysts.
- Customers and prospective customers.
- Business.
- Science, Research and Education.
- Media.
- Employees, prospective employees and their representatives.
- Suppliers.

- NGOs and interest groups.
- State / Government agencies.

As part of its sustainability management approach, OTE Group has established strong communication channels with all stakeholders to actively engage with them, understand their expectations and help shape the Group's Sustainability Policy.

OTE Group has established a three-tier engagement framework as part of its stakeholder dialogue, whereby three different methods of communication, i.e. Participation, Dialogue and Information, are employed depending on the type of stakeholder and the specificities of the issues that are most relevant to them.

In 2021, the Group participated in a number of sustainability-related working groups, taskforces, foras and events, some of which include:

- ETNO Working Groups for Sustainable Development and for the Green Deal
- **Women in Business (WIB) Committee**, of the American Hellenic Chamber of Commerce.
- **Circular Economy Committee**, of the American Hellenic Chamber of Commerce.
- **Board of Directors of CSR Hellas**
- CSR Hellas Working Group for the reduction of "Zero single-use plastics"
- 11th Annual Capital Link Sustainability Forum entitled "Tackling Social & Economic Transformation / Sustainable Growth: Environment - Economy - Society", organized by Capital Link: participation in panel on "New Technologies and Development".
- "ESG: Winning in the long run" event, organized by the Athens Exchange Group: key speech on "ESG in action".
- "Most Powerful Women Summit", organized by

- Fortune Greece: participation in panel on "How Good Boards Operate".
- "3rd Diversity in Business Conference", organized by Boussias Communications: participation in panel on "Diversity & Inclusion".
- Corporate Sustainability & Responsibility School 2021, organized by CSR HELLAS: key speeches for OTE Group's materiality analysis and human rights management.
- Business Integrity Forum, organized by Transparency International Greece: key speech on "How Compliance and Ethics Officers can actively support ESG criteria and the Sustainability goals of the organizations".
- 4th Compliance Conference "Building the Compliance Function of the New Era", organized by SEKASE: key speech on "When Compliance and Ethics meet ESG".

Stakeholders' feedback is also utilized as an input in the Group's materiality analysis process, which subsequently assists the validation and improvement of the Group's sustainability strategy. In 2020, OTE Group stakeholders were invited to participate in OTE Group's Materiality Analysis process, where they were asked to evaluate the significance of a list of issues with respects to their decisions. See **Materiality Analysis** for more information

More information is presented in the **Appendix**.



### METHODS OF STAKEHOLDER ENGAGEMENT WITH PRIMARY STAKEHOLDER GROUPS



#### PARTICIPATION

Stakeholder Survey  
Materiality Assessment  
Intranet: information, discussion and awareness raising  
Strengthening our corporate culture, encouraging a speak-up culture  
Sustainability & CR Networks and Forums



#### DIALOG

Sustainability Report questionnaire  
CSR Hellas Working Group for the reduction of "Zero single-use plastics"  
Climate Change Target DT working group  
Circular Economy committee of AMCHAM  
SRI Roadshows



#### INFORMATION

Internal newsletter for employees  
Zero plastic internal campaign  
Management Team Meeting  
Collaboration & awareness raising on safe use of the internet  
Corporate website and social media

### Memberships

OTE Group companies actively participate in associations and are informed about the trends and developments on ESG, Corporate Responsibility and Sustainability issues. In 2021, OTE Group companies maintained their voluntary participation, through their membership in a number of strategically important national and international bodies.



**United Nations**  
Global Compact



More information is presented in the [Appendix](#).

OTE GROUP | STAKEHOLDER MANAGEMENT & ENGAGEMENT

### Materiality Analysis

The OTE Group companies identify the most important issues of their sustainable development through the “Analysis of material issues” carried out in accordance with the Group's unified Enterprise Risk Management methodology.

In 2020, OTE Group conducted a materiality analysis through the participation of OTE Group's Senior Management and engagement of its stakeholders and as a result identified key risks and opportunities. The compliance risk assessment process was integrated in the materiality analysis process. OTE Group has merged its sustainability, compliance and risk management procedures, developing a holistic approach, according to best practices.

Senior Management members took part in the evaluation by assessing the likelihood of occurrence and the impact of all the listed issues for OTE Group. In addition, stakeholders were invited to submit their opinions by rating each issue (using a 5-grade scale) through an online questionnaire. The aim of the questionnaire was to capture each issue's importance with respect to the stakeholder's decisions regarding OTE Group.

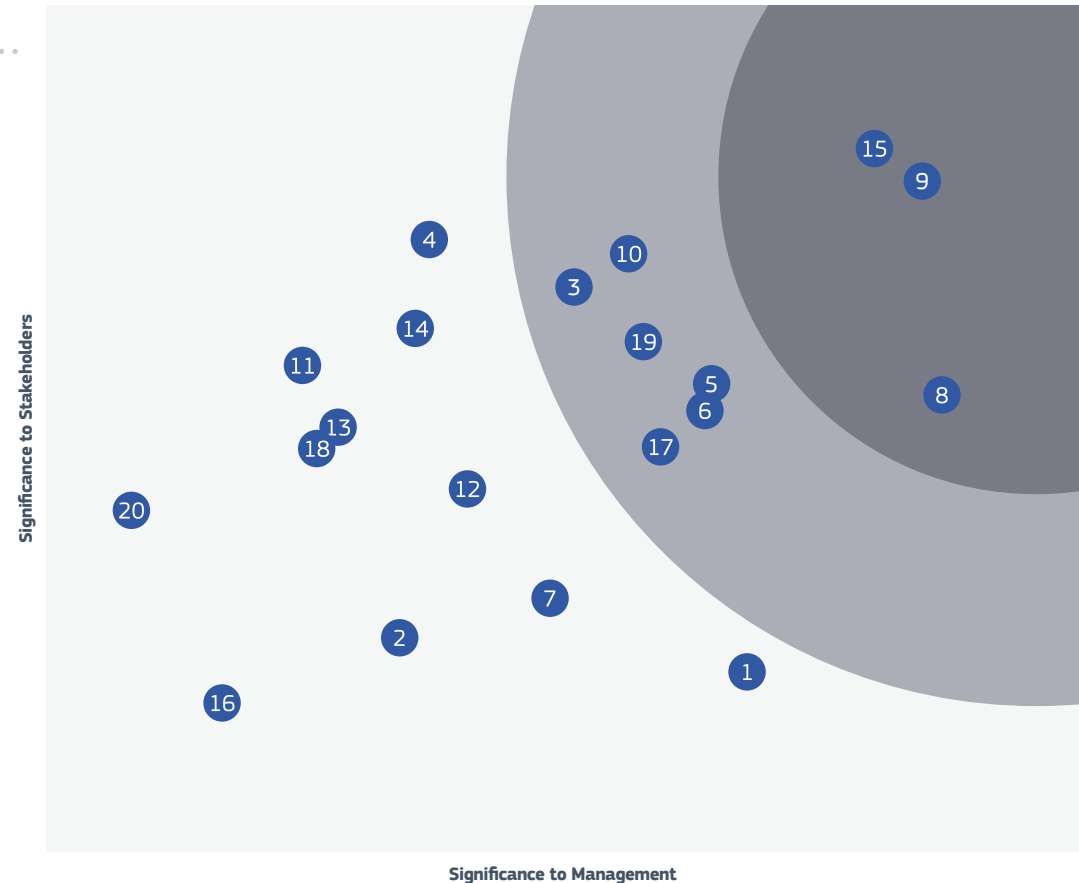
The results of the materiality analysis are used in the planning of the Group's strategy and actions, while the most important issues are included in the Group's risk map. In order to ensure that the results of the materiality analysis reflect the current most important sustainability issues of the Group, they were re- evaluated in 2021, by the OTE Group Compliance, Enterprise Risks and Corporate Governance Committee (GRC Committee). Specifically, new developments in the internal and external environment triggered the process of re-evaluating the results of the materiality analysis in order to maintain its validity and dynamic nature in accordance with ISO31000 element of a “Dynamic” system.

All available data were evaluated in order to be used in the Group's operations planning and strategy. The key issues and their handling / mitigation were included in its [risk map](#).

The 2021 Integrated Report refers to all 20 issues, with special focus on the 9 issues identified as the most material.

More information presented in the [Appendix](#).

- |   |  |   |  |
|---|--|---|--|
| 1 Economic performance                    | 6 Employee Training and Skills Development | 11 Digital Society                          | 16 Community Engagement and Impact from the Group's Operations |
| 2 Governance and management               | 7 Responsible Supply Chain                 | 12 Products and Services for Sustainability | 17 Energy and Climate Change                                   |
| 3 Ethical Business Practices              | 8 Business Continuity                      | 13 Safe and Responsible Use of Technology   | 18 Circular Economy  |
| 4 Human Rights                            | 9 Data Security and Privacy                | 14 Responsible Communication with Customers | 19 Electromagnetic Fields (EMF)                                |
| 5 Fair Employment and Employee Management | 10 Employee Health, Safety and Wellness    | 15 Customer Service and Satisfaction        | 20 Other Environmental Aspects                                 |



## MATERIAL ISSUES SUMMARY BASED ON ESG CRITERIA



### Energy and Climate Change

OTE Group recognizes that climate change is a global environmental challenge, the impacts of which affect its operation and stakeholders, and the whole range of economic activities, as well as life on the planet. OTE Group has in place a climate change strategy with ambitious targets that addresses mitigation activities across its value chain. OTE Group is committed to participate fully towards the achievement of the DT Group wide net zero targets: Net zero scope 1 and scope 2 GHG emissions from energy consumption by 2025, including up to 95% reduction of emissions from energy consumption by 2025 compared with 2017 (base year), 100% coverage of electricity consumption with electricity generated from renewable energy sources from 2021, 25% reduction of value chain (scope 3) emissions per customer by 2030, compared with 2017 (base year) and net zero GHG emissions (scope 1, 2 and 3) at the latest by 2040.

In 2021, there was significant progress towards the achievement of these targets as: scope 1 and scope 2 GHG emissions from energy consumption decreased by 88% compared to 2017 levels, 100% of electricity consumption was sourced from Renewable Energy Sources and scope 3 emissions (Greece) were about 40% lower than 2017 levels.

More information in the [Energy and Climate Change](#) chapter.

### Electromagnetic Fields (EMF)

Potential health effects of man-made electromagnetic fields (EMF) have received particular attention during the last 50 years and have been researched extensively. OTE Group pays particular attention to complying with national and international safety guidelines and providing products and services that not only meet the increasing needs of their customers, but are also safe and manufactured in accordance with international conventions and standards. Due to the increased global concern of the safety of electromagnetic fields, OTE Group has taken action to ensure the safety of its operations in this respect. In this context, OTE Group has adopted and implements an EMF Policy in which it is committed to applying the precautionary principle for the whole range of the products and services provided and contributing to public protection through actions aiming to increase transparency, awareness, participation and scientific knowledge. Such actions include the constant support of initiatives such as the “Pedion24” program of continuous electromagnetic fields

measurements, operating COSMOTE’s Environmental Electromagnetic Fields Measurement Laboratory (accredited according to EN ISO / IEC 17025) which covers measurements regarding 5G services, conducting additional measurements by the COSMOTE laboratory and in conjunction with other independent institutions (Universities, Greek Atomic Energy Commission) to ensure public safety. In 2021, 10 measurements were carried out by COSMOTE lab and 13 by third parties at COSMOTE’s request. Also, 13 EMF measurements were performed by ANCOM (National Authority for Management and Regulation in Communications) on Telekom Romania Mobile Communications sites at the request of external stakeholders. Recognizing the responsibility to maintain the safety of its products and services to its stakeholders, OTE Group aims to build and install 2 additional EMF measurement stations in 2022.

More information in the [Electromagnetic Fields](#) chapter

## Employee Training and Skills Development

A core part of OTE Group's strategy is to empower its employees and support them to develop the necessary skills to succeed within the Group, grow personally and professionally and make progress in their professional career. Acknowledging the value of investing in its own employees, OTE Group aims to further promote their skill transformation whilst integrating a digital learning culture. For this reason, for 2022 the Group aspires to continue conducting 70% of the trainings through digital platforms, while committing to the introduction of Future Skill Management for which a new skill management process and tool have already been prepared in 2021. This plan was set following a great success in 2021, where an amount of €4m was invested in employee training in Greece, 54% of the Group's employees participated in training, reaching 18.93 of training hours per OTE Group employee, and 50,358 training hours conducted via digital platforms. In order to offer a more personal approach to all virtual classrooms and adjusting to the COVID-19 conditions, an in-house Learning studio was created in 2021, fully equipped and capable to provide live streaming, trainings, team events, video recordings etc. During the same year,

more than 95% of total training hours were held in digital classrooms, with the use of various modern digital training and interaction tools, significantly enhancing the training experience of employees.

More information in the [Employee Training and Skills Development](#) chapter

## Employee Health, Safety and Wellness

Health and Safety is an important pillar of OTE Group's operations and strives to safeguard the occupational safety and health of all employees, as well as the safety of customers, contractors and suppliers. Since ensuring Health, Safety and Wellness of employees is of utmost importance while being an integral component of the Group's operations, a commitment to maintain the Group-wide health rate<sup>1</sup> up to 98% is set for 2022, along with the goal to further reduce the total number of work-related accidents compared to 2021. Human health matters the most for OTE Group, therefore in 2021, the annual awareness action plan was designed, while



taking into account the restrictions against COVID-19 pandemic and focused on actions for protection, awareness and motivation of a self-care culture in all employees' daily life. During 2021, the implementation of long-term Health & Safety training programs for safety at work continued, the total number of work-related accidents has been decreased per 21.12% compared to the value of last year and there were no fatal work accidents. Furthermore, additional actions to prevent COVID-19 spread continued and during this year, such as the implementation of an integrated COVID-19 case management procedure, in collaboration with the State by Occupational Physicians' Team of the Group.

More information in the [Health and Safety](#) chapter

## Fair Employment and Employee Management

Understanding that its employees have the utmost significance on its business, OTE Group aims to deliver on the commitment of creating a corporate culture that will embrace and

promote the values of Diversity, Equality and Inclusion. Consequently, OTE Group is vigilant with ensuring that it fosters a working environment that offers fair and equal opportunities to all, independent of gender, age, race and/or religion, sexual orientation etc.

In this regard, in 2021, the Group adopted the Diversity, Equity & Inclusion Policy for all its employees, employed 99% of OTE Group employees on indeterminate term contracts, covered 96% of employees by Collective Labor Agreements, provided 318 women and 280 men with parental leave, achieved a 12% voluntary turnover rate and reached a 3% pay gap between men and women always aspiring to further improve it through the implementation of its relevant policies.

With this in mind, in 2022, OTE Group commits to further promote Diversity, Equity & Inclusion, through targeted actions for all employees and leaders through -amongst other initiatives- a mentoring program for women and dedicated e-learning for all employees in conjunction to designing an agile organization and creating a relevant working culture.

More information in the [Human Resources Management](#) and [Fair Employment Policy Framework and Equal Opportunities](#) chapters

1. Health rate: The ratio of the percentage of working days when no absences due to illness need to be recorded in relation to the target working days in the analysis period. Includes all sicknesses (excluding pregnancy, including sickness due to accidents).

## Customer Service and Satisfaction

COSMOTE operates with a customer-centric approach, striving to make its customers' lives better. Client satisfaction is indisputably the essence of OTE Group's products and services, hence in 2021, the Group retained its strategy for superior customer experience across customer journeys and channels, while emphasizing in digital experience, an imperative need due to COVID-19 environment and internet increased needs. In respect to

maintaining customer satisfaction to high levels, in 2021, COSMOTE continued the collection of customer feedback via a wide range of customer surveys with regards to customer relationships, products and services, as well as their overall experience from contacting COSMOTE touchpoints. High scores were achieved on the TRI\*M Loyalty Index,



showcasing strong customer loyalty. Additionally, high scores were achieved in other questions showcasing the Group's consistent and ever-growing strong customer satisfaction. Overall, customers are satisfied with their experience in call centers, stores, and the website. According to the 2021 Customer Survey Results, 85% of customers in

Greece have rated the overall company's performance as Excellent, Very Good or Good. Similarly, in Romania the percentage was 80%. In order to safeguard customer satisfaction but also expand the Group's services, the Group is committed to offer the services remotely through digital channels, without human interaction by 2023 and at the same time, increase the Digital Self-Care Penetration to ensure interactive and convenient Customer Experience by 2023.

More information in the [Customer Service and Satisfaction](#) chapter.

## Ethical Business Practices

OTE Group's business conduct is guided and defined by the principles of Ethical Business. OTE Group's Management and its stakeholders require the Group to comply with laws and regulations and to bear zero tolerance in the areas of fraud, corruption, illegal acts, and misconduct, as well as to ensure that employees comply with the Group's Code of Conduct and that they do not act on their own vested interests. Consequently, Compliance is one of the Group's top priorities presenting a solid commitment to the principles of integrity, transparency, fairness, professionalism, team spirit, as well as of the respect for the rules

and principles, which are essential to govern the operation of the Group. As OTE Group constantly evaluates the ethical culture of its operations, in 2021, a Compliance Risk Assessment was conducted. At the same time, more than 4,600 employees participated in the Compliance Training program. Additionally, for 2022, the Group plans to review and implement new Compliance Policies and Codes, as well as to develop a human rights due diligence program according to the UN Guiding Principles on Business and Human



Rights. Awareness raising and trainings will be continued and expanded to cover multiple ethical compliance topics, while the enterprise's business partners will also be involved in trainings regarding OTE Group Principles, the OTE Group Compliance Management System and the related Codes. In 2021, 8 fraud incidents and serious violations of OTE Group Code of Conduct by employees were identified, from which the five resulted in the termination of contract of employees, there were no court convictions for

corruption issues against OTE Group or its employees in relation to their professional activities and no incidents of corruption regarding contracts with business partners, which resulted in the termination of the contract or its non-renewal. Consequently, the Group is committed to further invest in risk assessment and proactive controls by developing a set of Key Risk Indicators to define its tolerance levels and by applying qualitative risk analysis on business projects using statistical risk analysis.

More information in the [Compliance Management](#) and [Enterprise Risk Management](#) chapters.



## Business Continuity

Customers require uninterrupted high-quality products and services provision and it is OTE Group's commitment to progress towards meeting this expectation. Therefore, OTE Group strives for high caliber Customer Experience and invests in the development of mechanisms for the timely recognition and treatment of incidents that affect or are likely to affect the business continuity of critical products and services. Therefore, OTE Group aims to achieve a maximum degree of resilience and ability to cope with adverse and extraordinary circumstances, to ensure the uninterrupted provision of quality products and services. The sweeping passage of the COVID-19 pandemic and the lockdowns of the last 2 years have left a strong imprint in all areas of business activity. These unprecedented conditions underlined the importance of Business Continuity to ensure the resilience within organizations and society in general. Recognizing the vital role of readiness and emergency preparedness, in 2021, Group companies had their Business Continuity Management Systems successfully recertified according to ISO 22301:2019 requirements. Moreover, during 2021, the Group continued investing in the technology hardening and network expansion to

accommodate telecommunication needs during the pandemic whilst updating all Business Continuity Plans to cover the critical processes of all key COSMOTE products and services, as well as its Disaster Recovery Plans by IT and Network to reflect existing and new technologies. Last but not least, in context of continuously safeguarding Business Continuity, the Group continued the development of an automated and structural methodology for Network Impact Analysis, implemented risk assessment studies in critical services - either for COSMOTE or its ICT Customers - and critical buildings all over Greece and enhanced fire protection measures for critical Telecommunication Data Centers.

More information in the [Business Continuity](#) chapter.



## Data Security and Privacy

Maintaining and enhancing customers' trust is hugely important for the success of OTE Group and Business Security and Data Privacy are fundamental for this purpose.

These aspects of the Group's operation are more than just an obligation to comply with legal and regulatory requirements and they are heavily reflected in the quality of the services offered.

To ensure and maximize data security and privacy, the Group has committed to initiate the implementation of Phase II of the Schrems II project<sup>1</sup>, to increase the number of ISO27001/27701 certifications and to implement a new Security and Privacy risk management framework in 2022. In this framework, and under the principles of Business Security and Data Privacy which formulate the cornerstone of the Group's activity, in 2021, the Privacy and Security Assessment (PSA) was re-executed for 63 critical systems and completed for 50 new systems/projects, while the scope of

ISO27001 for OTE and COSMOTE was expanded to ISO 27701 covering the Privacy Information Management System. At the same time and aiming to achieve a holistic approach, 8,857 employees participated in data privacy e-learning. Finally, in fulfilling the standing commitment to handle all complaints and requests with effectiveness and respect, OTE and COSMOTE handled 1,435 data subject requests, while Telekom Romania Mobile handled 828 requests. Several other cases have also been investigated in 2021 and amongst others, OTE and COSMOTE reported 37 incidents to the DPA and the ADAE, by adhering to GDPR and L3471/2011 for the protection of personal data and privacy in the electronic telecommunications sector. Many of those incidents were classified as low-risk incidents.

More information in the [Security and Data Privacy](#) chapter.

1. Schrems II is a project that covers the fulfilment of EDPB Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data and the transition to the new Standard Contractual Clauses.

## Sustainability Indices and Ratings

The OTE Group responds to sustainability & ESG analysts' questions and assessments.

OTE is included in several national and international sustainability/ESG indices, rankings and ratings.



FTSE4Good

OTE, since 2008, fulfills all requirements and is a member of the FTSE4Good Index Series. OTE is one of the seven companies in Greece, included in the FTSE4Good Emerging Index, as of June 2021.



OTE, as of July 2021, is included in the Vigeo-Eiris Best Emerging Market Performers Ranking, part of Moody's ESG Solutions, for the third consecutive year. A total of 843 companies from 36 sectors in 31 countries were assessed, of which the 100 with the highest score were included in this list. OTE is one of 4 companies in Greece included in this ranking.



In 2021, OTE kept its status as a "Prime" company, a title awarded to companies-leaders of each sector by ISS ESG, in recognition of OTE's negotiable bonds and shares qualify for responsible investment. OTE was also ranked amongst the top 10% of Telecommunications companies in terms of performance.



In 2021, following MSCI ESG Research's assessment, OTE maintained "BBB" ESG rating.



Since 2010, OTE has been participating in the CDP on Climate Change by communicating the required information to its platform. In the 2021 evaluation, OTE improved its rating which led to inclusion in the CDP's "Leadership A/A-" category. This score placed OTE well above the European average and that of the media, telecommunications and data center services sector in which it operates.



As of January 2022, OTE has been included, for the third consecutive year, in the Bloomberg LP Gender-Equality Index (GEI), which is one of the most profound business indexes, in terms of equality and initiatives promoting the position of women in the work environment. OTE is among the 418 companies representing a combined market capitalization of USD16 Trillion and headquartered in 45 countries and regions which are included in the 2022 Bloomberg Gender-Equality Index (GEI).



ATHEXGROUP  
Athens Exchange Group

OTE, since July 2021, was included in the Athens Stock Exchange's new Athex ESG Index, along with 34 other listed companies. The Index monitors the stock market performance of ASE listed companies that adopt and promote ESG practices.

# Awards

In 2021, OTE Group companies received several awards and distinctions for their sustainability/ ESG performance and actions, some of which are:



### CR REPORTING AWARDS 2021 (CRRA'21)

ORGANIZED BY CORPORATE REGISTER

The Group is the **winner** in the “Creativity in Communications” category and the first **runner-up** in the “Best Integrated Report” category, for the 2019 OTE Group Integrated Report.

### HELLENIC RESPONSIBLE BUSINESS AWARDS 2021

ORGANIZED BY BOUSSIAS COMMUNICATIONS

OTE Group received:

- **Gold** award in the “Sustainable Development – Natural Resources Management” category for the “Refurbishment & Reuse of Terminal Equipment” program,
- **Silver** award in the “Technology for the common good – CSR Apps” category for the Missing Alert App, and
- **Bronze** awards in the “Sustainable Development Green Buildings / Structured Environment” category for the COSMOTE TV Studios – LEED GOLD Certification.

### “BRAVO” SUSTAINABILITY AWARDS 2021

ORGANIZED BY QUALITYNET FOUNDATION

The Group received:

- **Award** in the “Market” category for the “Grow your business initiative” aiming at the digitalization of SMEs.
- **Distinction** for Management of the COVID-19 crisis in the category “Actions COVID-19”.

### IMPACT BUSINESS IT EXCELLENCE (BITE) AWARDS 2021

ORGANIZED BY BOUSSIAS COMMUNICATIONS

Among the **9 awards** that OTE and COSMOTE received – including the “ICT Company of the decade” award that OTE Group received – the “Missing Alert App”, earned the **Gold** Award in the “Social Contribution” category.

### “CHANGE THE WORLD LIST”

OF FORTUNE GREECE

OTE Group is included in 2021 for its #GrowYourBusiness initiative.

### “SUSTAINABILITY PERFORMANCE DIRECTORY”

OF QUALITYNET FOUNDATION

OTE Group is included in the “The Most Sustainable Companies in Greece 2022” list.

### ANNUAL SUSTAINABILITY SUMMIT

ORGANIZED BY THE MBA INTERNATIONAL OF ATHENS UNIVERSITY OF ECONOMICS AND BUSINESS (AUER), IN COLLABORATION WITH THE CENTER FOR SUSTAINABILITY AND EXCELLENCE (CSE)

OTE Group received a distinction for the “100% coverage of electricity consumption with electricity generated from renewable energy sources, in 2020” environmental initiative.

### CST INDEX 2021

Telekom Romania Mobile in the “**Gold Winner**” category, with a top position.

Overall, OTE Group has received several awards in 2021 and as such respective references to the award-winning initiatives and programs are included throughout the Report, where relevant and applicable.

# Financial and Operational Highlights



## TRANSPARENT PERFORMANCE INFORMATION ENABLES OTE GROUP TO COMMUNICATE SUCCESSES AND FUTURE EXPECTATIONS

to investors and foster strategic decisions regarding expansion and efficient operation management.

The **total number of OTE Group employees** as of 31st December 2021 is 11,038.

OTE Group's **consolidated revenues** totaled €3,368.3m in 2021, up 3.4% compared to the prior year, supported by solid performances in Greek operations and a substantial recovery from the impact of the pandemic in 2020.

On a country basis, total revenues in Greece posted a solid increase of 4.7% to €3,078.1m on

positive momentum throughout the year, fueled by strong growth in broadband, mobile, and ICT, as well as a recovery in tourism. Service revenues were up 1.4% in the fixed segment and 4.4% in mobile, supported by ongoing investments in network infrastructure and customer experience.

In Romania mobile, total revenues reached €315.5m in 2021, down 10.0% from a high comparison base in 2020, when certain ICT

projects had been recorded. In addition, a drop in service revenues, notably in prepaid, as well as lower interconnection revenues, impacted the 2021 total.

**Total Group Operating Expenses**, excluding depreciation, amortization, impairment and charges related to voluntary leave schemes, other

restructuring costs and non-recurring litigations amounted to €1,995.8m in 2021, up 1.9% compared to 2020. The beneficial impact of the voluntary exit schemes implemented in 2020 was mainly offset by higher variable costs and the impact of global price hikes on energy costs.

In 2021, the **Group's Adjusted EBITDA After Lease**

OTE GROUP | FINANCIAL AND OPERATIONAL HIGHLIGHTS

(AL) amounted to €1,295.9m, up 5.9%, yielding a margin of 38.5% compared to 37.5% in 2020, on positive performances in both Greece and Romania. In Greece, Adjusted EBITDA After Lease (AL) increased by 5.5% to €1,265.4m, resulting in a margin of 41.1%, mainly due to higher top-line performance and savings in personnel costs. Romania Mobile achieved a significant increase in Adjusted EBITDA After Lease (AL), up 24.5% to €30.5m compared to €24.5m in 2020, reflecting cost-containment initiatives implemented throughout the year.

**Group expenses** for depreciation, amortization and impairment stood at €667.6m, compared to €833.2m in 2020, mainly due to the impairment loss of €160.0m recognized in 2020, as a result of the impairment test performed for TELEKOM ROMANIA MOBILE.

The Group reported **Operating profit** before financial and investing activities of €812.3m, compared to €331.4m in 2020. In addition to the improved performances in both Greece and Romania, the increase reflects the €133.5m reversal in 2021 of a provision related to OTE's pension fund for voluntary leave schemes of past years, higher costs for voluntary exit schemes in 2020, and lower depreciation, amortization and impairment charges as a result of the aforementioned 2020 impairment.

Interest and related expenses stood at €45.0m, down 19.9%, mainly reflecting the favorable evolution in average cost of debt.

The Group's income tax expense stood at €233.6m in 2021, increased compared to 2020, mainly reflecting the tax effect from deductible

investment losses recorded in 2020, higher profitability in the year and the impact on the deferred tax asset base of the reduction in corporate income tax rate from 24% to 22%.

Profit for the year from continuing operations (attributable to owners of the parent) stood at €487.0m in 2021, compared to €263.4m recorded in 2020.

In 2021, Adjusted Free Cash Flow After Lease (AL) stood at €590.1m, down 10.0% compared to 2020, mainly reflecting higher income tax paid along with working capital changes in the year.

The Group's Adjusted Net Debt stood at €775.6m at December 31, 2021, down 25.0% compared to December 31, 2020. The Group's ratio of Adjusted Net Debt to Adjusted EBITDA (AL) stood at 0.6x.

### Revised Shareholders Remuneration Policy

On February 23, 2022, the Board of Directors approved the revised Shareholders Remuneration Policy. The Policy has been defined as follows:

Provided the external and the macroeconomic environment remain stable, the Company intends to distribute to its shareholders, through a combination of dividend payout and Share Buyback Programs (whereby acquired shares will be cancelled), between 70% and 100% of net free cash flow generated every year. In the coming years, the total shareholders remuneration payout will be split by 50% between dividends and share buybacks.

The Board will examine the use of any cash flow reserves which may be accumulated in the medium term, together with past surpluses.

The implementation of the revised Shareholders Remuneration Policy will start in 2022 and will take into account the net free cash flow projections for the current year, i.e. 2022, as the basis for calculating the aggregate shareholder payout. In the same way, the Remuneration Policy will be applied in the forthcoming years, i.e. the basis for calculating total shareholders' remuneration in 2023 will take into account the projections of net free cash flow for 2023 and so on.

Based on the current projection for 2022, the net free cash flow is estimated to reach approximately the amount of €600m. The total Shareholder Remuneration amount (dividends and share buy backs) will reach approximately €500m.

For the part of the Shareholder remuneration corresponding to dividend distribution, it is proposed that a dividend of €0.558 (in absolute amount) per share or a total amount of €250m be distributed from intragroup dividends and prior years' earnings. It is noted that the amount of €0.558 (in absolute amount) per share (a) exceeds the minimum dividend payable as required by article 161 of Law 4548/2018 and (b) corresponds to 448,100,608 shares into which the share capital of the Company is divided following the cancellation of 8,638,512 own shares according to the relevant decision of the Extraordinary General Meeting of Shareholders on January 18, 2022.

It is noted that the dividend that will be approved by General Shareholders Meeting that will take place in 2022 and will correspond to own shares



that will be owned by the Company at the ex-dividend date, will increase the dividend of the other shareholders according to the law.

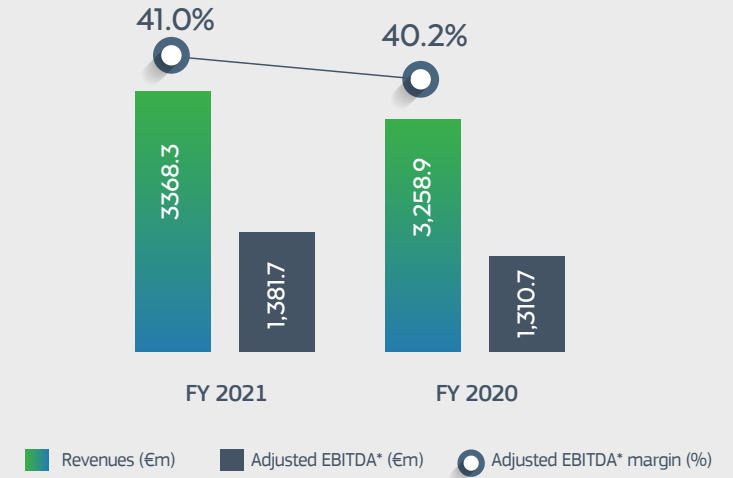
It is further noted that, the remaining amount, i.e. approximately €250m (amount to vary within a 3% range depending on market conditions and execution) or 50% of the total amount to be allocated under the Shareholders Remuneration for 2022, will be used for the buyback of Company's shares under the Share Buyback Program as approved by the Extraordinary General Shareholders' Meeting held on January 18, 2022.

OTE Group's complete financial activity for 2021 is presented in its [2021 Annual Financial Report](#).



## OTE GROUP | FINANCIAL AND OPERATIONAL HIGHLIGHTS

	OTE	COSMOTE	Other activities in Greece	Telekom Romania Mobile Communications
Revenue	€1,600.7m	€1,202.1m	€1152.6m	€315.5m
EBITDA	€848.8m	€509.0m	€146.9m	€47.5m
CAPEX investments (incl. Spectrum charges)	€317.5m	€164.2m	€35.1m	€69.2m
Subscribers	2,715,939 fixed telephony	7,098,290 mobile telephony		3,688,430 mobile telephony
	2,255,703 broadband connections, of which 945,088, fiber service <sup>1</sup>			
	624,195 COSMOTE TV subscribers			
Adj EBITDA AL	<b>€694.6m</b>	<b>€451.1m</b>	<b>€121.6m</b>	<b>€30.5m</b>

**OTE GROUP FINANCIAL PERFORMANCE IN €M**


\* Excluding the impact of costs related to voluntary leave schemes, other restructuring costs and non-recurring litigations

# Financial Position Statements

STATEMENTS OF FINANCIAL POSITION (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro)	GROUP		COMPANY	
	2021	2020	2021	2020
<b>ASSETS</b>				
<b>Non-current assets</b>				
Property, plant and equipment	2,080.3	2,060.6	1,250.2	1,250.3
Right-of-use assets	264.7	362.1	150.2	235.5
Goodwill	376.6	376.6	-	-
Telecommunication licenses	348.9	361.0	1.7	2.5
Other intangible assets	387.7	408.0	275.5	282.3
Investments	0.1	0.1	3,158.8	3,083.8
Loans to pension funds	68.6	72.3	68.6	72.3
Deferred tax assets	197.9	364.0	22.7	185.4
Contract costs	24.3	24.6	9.8	5.5
Other non-current assets	75.9	75.7	45.8	72.4
<b>Total non-current assets</b>	<b>3,825.0</b>	<b>4,105.0</b>	<b>4,983.3</b>	<b>5,190.0</b>
<b>Current assets</b>				
Inventories	38.0	26.9	5.0	7.6
Trade receivables	504.4	433.1	304.1	250.4
Other financial assets	5.6	5.4	3.0	2.8
Contract assets	34.6	28.7	3.4	0.4
Other current assets	176.9	143.8	164.8	251.2
Restricted cash	1.8	2.3	-	-
Cash and cash equivalents	630.7	516.2	274.0	105.5
<b>Total current assets</b>	<b>1,392.0</b>	<b>1,156.4</b>	<b>754.3</b>	<b>617.9</b>
Assets of disposal group classified as held for sale	-	606.5	-	148.7
<b>TOTAL ASSETS</b>	<b>5,217.0</b>	<b>5,867.9</b>	<b>5,737.6</b>	<b>5,956.6</b>
<b>EQUITY AND LIABILITIES</b>				
<b>Equity attributable to owners of the Parent</b>				
Share capital	1,292.6	1,330.6	1,292.6	1,330.6
Share premium	462.6	476.4	462.6	476.4
Treasury shares	(157.1)	(132.2)	(157.1)	(132.2)
Statutory reserve	440.7	440.7	440.7	440.7
Foreign exchange and other reserves	(168.6)	(201.6)	(32.8)	(27.9)
Changes in non-controlling interests	(3,314.1)	(3,314.1)	-	-
Retained earnings	3,414.4	3,396.0	1,192.6	1,171.6
<b>Total equity attributable to owners of the Parent</b>	<b>1,970.5</b>	<b>1,995.8</b>	<b>3,198.6</b>	<b>3,259.2</b>

## OTE GROUP | FINANCIAL POSITION STATEMENTS | STATEMENTS OF FINANCIAL POSITION (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro)	GROUP		COMPANY	
	2021	2020	2021	2020
Non-controlling interests	1.7	144.0	-	-
<b>Total equity</b>	<b>1,972.2</b>	<b>2,139.8</b>	<b>3,198.6</b>	<b>3,259.2</b>
<b>Non-current liabilities</b>				
Long-term borrowings	753.7	974.8	797.6	894.1
Provision for staff retirement indemnities	139.9	145.7	50.8	120.1
Provision for youth account	98.4	109.2	98.4	109.2
Contract liabilities	33.2	25.4	48.2	44.1
Lease liabilities	189.2	290.6	126.5	195.3
Deferred tax liabilities	3.3	9.8	-	-
Other non-current liabilities	89.3	107.8	115.8	141.1
<b>Total non-current liabilities</b>	<b>1,307.0</b>	<b>1,663.3</b>	<b>1,237.3</b>	<b>1,503.9</b>
<b>Current liabilities</b>				
Trade accounts payable	818.5	719.8	468.2	371.5
Short-term borrowings	-	205.9	-	270.8
Short-term portion of long-term borrowings	397.3	231	374.2	-
Income tax payable	44.0	76.2	7.9	7.9
Contract liabilities	118.4	121.8	76.7	74.3
Lease liabilities	71.7	61.2	25.3	44.8
Provision for voluntary leave schemes	-	178.9	-	178.9
Dividends payable	2.3	2.2	2.3	2.1
Other current liabilities	485.6	364.5	347.1	243.2
<b>Total current liabilities</b>	<b>1,937.8</b>	<b>1,753.6</b>	<b>1,301.7</b>	<b>1,193.5</b>
Liabilities of disposal group classified as held for sale	-	311.2	-	-
<b>TOTAL EQUITY AND LIABILITIES</b>	<b>5,217.0</b>	<b>5,867.9</b>	<b>5,737.6</b>	<b>5,956.6</b>

# Income Statements

## INCOME STATEMENTS (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro except per share data)	GROUP		COMPANY	
	2021	2020	2021	2020
<b>Revenue</b>				
<b>Fixed business:</b>				
Retail services revenues	950.8	938.1	948.2	938.2
Wholesale services revenues	585.3	574.1	339.6	330.5
Other revenues	293.9	294.0	264.4	258.3
<b>Total revenues from fixed business</b>	<b>1,830.0</b>	<b>1,806.2</b>	<b>1,552.2</b>	<b>1,527.0</b>
<b>Mobile business:</b>				
Service revenues	1,172.2	1,138.8	-	-
Handset revenues	270.1	229.6	1.7	22.9
Other revenues	24.3	18.9	-	-
<b>Total revenues from mobile business</b>	<b>1,466.6</b>	<b>1,387.3</b>	<b>1.7</b>	<b>22.9</b>
Miscellaneous other revenues	71.7	65.4	46.8	64.4
<b>Total revenues</b>	<b>3,368.3</b>	<b>3,258.9</b>	<b>1,600.7</b>	<b>1,614.3</b>
<b>Other operating income</b>	<b>9.2</b>	<b>10.4</b>	<b>28.9</b>	<b>8.7</b>
<b>Operating expenses</b>				
Interconnection and roaming costs	(447.1)	(437.9)	(89.2)	(82.8)
Provision for expected credit losses	(67.6)	(78.1)	(26.0)	(27.5)
Personnel costs	(430.6)	(481.3)	(91.2)	(242.0)
Costs related to voluntary leave schemes	121.8	(132.6)	129.9	(117.8)
Commission costs	(85.0)	(77.8)	(47.4)	(24.2)
Merchandise costs	(325.0)	(305.5)	(57.9)	(78.7)
Maintenance and repairs	(74.1)	(68.7)	(38.8)	(36.5)
Marketing	(66.0)	(63.5)	(18.9)	(21.2)
Other operating expenses, out of which:	(524.0)	(459.3)	(541.3)	(342.5)
<i>Facility and other lease related costs</i>	(107.7)	(95.4)	(62.6)	(57.9)
<i>Third party fees and services</i>	(177.6)	(164.5)	(343.1)	(193.8)
<i>Other taxes and regulatory charges</i>	(73.6)	(64.2)	(33.6)	(23.2)
<i>Construction cost network</i>	(0.2)	(0.3)	-	-
<i>Other sundry operating expenses</i>	(164.9)	(134.9)	(102.0)	(67.6)
<b>Total operating expenses before depreciation, amortization and impairment</b>	<b>(1,897.6)</b>	<b>(2,104.7)</b>	<b>(780.8)</b>	<b>(973.2)</b>
<b>Operating profit before financial &amp; investing activities, depreciation, amortization &amp; impairment</b>	<b>1,479.9</b>	<b>1,164.6</b>	<b>848.8</b>	<b>649.8</b>
Depreciation, amortization and impairment	(667.6)	(833.2)	(364.8)	(363.0)
<b>Operating profit before financial and investing activities</b>	<b>812.3</b>	<b>331.4</b>	<b>484.0</b>	<b>286.8</b>
<b>Income and expense from financial and investing activities</b>				
Interest and related expenses	(45.0)	(56.2)	(30.9)	(47.6)
Interest income	1.0	1.7	1.1	2.2
Foreign exchange differences, net	1.5	(3.6)	1.7	(1.0)
Dividend income	-	-	200.9	331.0
Gains / (losses) from investments and other financial assets - Impairment	(50.4)	9.8	42.5	(90.4)
<b>Total profit / (loss) from financial and investing activities</b>	<b>(92.9)</b>	<b>(48.3)</b>	<b>215.3</b>	<b>194.2</b>
<b>Profit before tax</b>	<b>719.4</b>	<b>283.1</b>	<b>699.3</b>	<b>481.0</b>

## OTE GROUP | INCOME STATEMENTS | INCOME STATEMENTS (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro except per share data)	GROUP		COMPANY	
	2021	2020	2021	2020
Income tax	(233.6)	(45.9)	(135.6)	31.1
<b>Profit for the year from continuing operations</b>	<b>485.8</b>	<b>237.2</b>	<b>563.7</b>	<b>512.1</b>
Profit from discontinued operations	103.9	138.5	-	-
<b>Profit for the year</b>	<b>589.7</b>	<b>375.7</b>	<b>563.7</b>	<b>512.1</b>
Attributable to:				
Owners of the parent	557.6	359.9	563.7	512.1
<i>From continuing operations</i>	487.0	263.4	563.7	512.1
<i>From discontinued operations</i>	70.6	96.5	-	-
Non-controlling interests	32.1	15.8	-	-
<b>Profit for the year</b>	<b>589.7</b>	<b>375.7</b>	<b>563.7</b>	<b>512.1</b>
<b>Earnings per share attributable to owners of the parent from continuing operations</b>				
Basic earnings per share	1.0720	0.5659	-	-
Diluted earnings per share	1.0720	0.5659	-	-
<b>Total basic earnings per share attributable to owners of the parent</b>	<b>1.2274</b>	<b>0.7732</b>	-	-

## STATEMENTS OF COMPREHENSIVE INCOME (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro)	GROUP		COMPANY	
	2021	2020	2021	2020
Profit for the year	589.7	375.7	563.7	512.1
<b>Other comprehensive income:</b>				
<b>Items that will not be reclassified subsequently to profit or loss</b>				
Actuarial gains / (losses)	(6.2)	(10.0)	(5.2)	(7.3)
Deferred taxes on actuarial gains / (losses)	1.3	2.3	1.1	1.8
Deferred taxes on actuarial gains / (losses) due to change in tax rate	(0.8)	-	(0.8)	-
<b>Total items that will not be reclassified subsequently to profit or loss</b>	<b>(5.7)</b>	<b>(7.7)</b>	<b>(4.9)</b>	<b>(5.5)</b>
<b>Items that may be reclassified subsequently to profit or loss</b>				
Foreign currency translation	(4.2)	(9.3)	-	-
<b>Total items that may be reclassified subsequently to profit or loss</b>	<b>(4.2)</b>	<b>(9.3)</b>	-	-
Reclassification of foreign currency translation reserve related to operations disposed	41.9	-	-	-
<b>Other comprehensive income / (loss) for the year</b>	<b>32.0</b>	<b>(17.0)</b>	<b>(4.9)</b>	<b>(5.5)</b>
<b>Total comprehensive income / (loss) for the year</b>	<b>621.7</b>	<b>358.7</b>	<b>558.8</b>	<b>506.6</b>
Attributable to:				
Owners of the parent	590.6	345.8	558.8	506.6
Non-controlling interests	31.1	12.9	-	-
	<b>621.7</b>	<b>358.7</b>	<b>558.8</b>	<b>506.6</b>



## OTE GROUP | INCOME STATEMENTS | STATEMENTS OF COMPREHENSIVE INCOME (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro)	GROUP		COMPANY	
	2021	2020	2021	2020
<b>Total comprehensive income attributable to owners of the parent arises from:</b>				
Continuing operations	520.7	251.8	558.8	506.6
Discontinued operations	69.9	94.0	-	-
	<b>590.6</b>	<b>345.8</b>	<b>558.8</b>	<b>506.6</b>

## Changes in Equity Statements

## STATEMENT OF CHANGES IN EQUITY (CONSOLIDATED)

(Amounts in millions of Euro)	Attributed to equity holders of the parent								Non-controlling interests	Total equity
	Share capital	Share premium	Treasury shares	Statutory reserve	Foreign exchange and other reserves	Changes in non-controlling interests	Retained earnings	Total		
<b>Balance as at January 1, 2020</b>	<b>1,358.2</b>	<b>486.6</b>	<b>(110.3)</b>	<b>415.1</b>	<b>(187.5)</b>	<b>(3,314.1)</b>	<b>3,404.0</b>	<b>2,052.0</b>	<b>131.1</b>	<b>2,183.1</b>
Profit for the year	-	-	-	-	-	-	359.9	359.9	15.8	375.7
Other comprehensive income / (loss)	-	-	-	-	(14.1)	-	-	(14.1)	(2.9)	(17.0)
<b>Total comprehensive income / (loss)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(14.1)</b>	<b>-</b>	<b>359.9</b>	<b>345.8</b>	<b>12.9</b>	<b>358.7</b>
Cancellation of treasury shares	(27.6)	(10.0)	121.3	-	-	-	(83.7)	-	-	-
Dividend distribution	-	-	-	-	-	-	(258.6)	(258.6)	-	(258.6)
Transfer to statutory reserve	-	-	-	25.6	-	-	(25.6)	-	-	-
Acquisition of treasury shares	-	-	(143.2)	-	-	-	-	(143.2)	-	(143.2)
Share option plans	-	(0.2)	-	-	-	-	-	(0.2)	-	(0.2)
<b>Balance as at December 31, 2020</b>	<b>1,330.6</b>	<b>476.4</b>	<b>(132.2)</b>	<b>440.7</b>	<b>(201.6)</b>	<b>(3,314.1)</b>	<b>3,396.0</b>	<b>1,995.8</b>	<b>144.0</b>	<b>2,139.8</b>
<b>Balance as at January 1, 2021</b>	<b>1,330.6</b>	<b>476.4</b>	<b>(132.2)</b>	<b>440.7</b>	<b>(201.6)</b>	<b>(3,314.1)</b>	<b>3,396.0</b>	<b>1,995.8</b>	<b>144.0</b>	<b>2,139.8</b>
Profit for the year	-	-	-	-	-	-	557.6	557.6	32.1	589.7
Other comprehensive income / (loss)	-	-	-	-	33.0	-	-	33.0	(1.0)	32.0
<b>Total comprehensive income</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>33.0</b>	<b>-</b>	<b>557.6</b>	<b>590.6</b>	<b>31.1</b>	<b>621.7</b>
Cancellation of treasury shares (Note 16)	(38.0)	(13.6)	168.1	-	-	-	(116.5)	-	-	-
Net change of participation in subsidiaries (Note 9)	-	-	-	-	-	-	3.5	3.5	(173.4)	(169.9)
Dividend distribution (Note 18)	-	-	-	-	-	-	(426.2)	(426.2)	-	(426.2)
Acquisition of treasury shares (Note 16)	-	-	(193.0)	-	-	-	-	(193.0)	-	(193.0)
Share option plans	-	(0.2)	-	-	-	-	-	(0.2)	-	(0.2)
<b>Balance as at December 31, 2021</b>	<b>1,292.6</b>	<b>462.6</b>	<b>(157.1)</b>	<b>440.7</b>	<b>(168.6)</b>	<b>(3,314.1)</b>	<b>3,414.4</b>	<b>1,970.5</b>	<b>1.7</b>	<b>1,972.2</b>

## OTE GROUP | CHANGES IN EQUITY STATEMENTS

## STATEMENT OF CHANGES IN EQUITY (SEPARATE)

(Amounts in millions of Euro)	Share capital	Share premium	Treasury shares	Statutory reserve	Foreign exchange and other reserves	Retained earnings	Total equity
<b>Balance as at January 1, 2020</b>	<b>1,358.2</b>	<b>486.6</b>	<b>(110.3)</b>	<b>415.1</b>	<b>(22.4)</b>	<b>1,027.4</b>	<b>3,154.6</b>
Profit for the year	-	-	-	-	-	512.1	512.1
Other comprehensive income / (loss)	-	-	-	-	(5.5)	-	(5.5)
<b>Total comprehensive income / (loss)</b>	-	-	-	-	(5.5)	512.1	506.6
Cancellation of treasury shares	(27.6)	(10.0)	121.3	-	-	(83.7)	-
Transfer to statutory reserve	-	-	-	25.6	-	(25.6)	-
Dividend distribution	-	-	-	-	-	(258.6)	(258.6)
Acquisition of treasury shares	-	-	(143.2)	-	-	-	(143.2)
Share option plans	-	(0.2)	-	-	-	-	(0.2)
<b>Balance as at December 31, 2020</b>	<b>1,330.6</b>	<b>476.4</b>	<b>(132.2)</b>	<b>440.7</b>	<b>(27.9)</b>	<b>1,171.6</b>	<b>3,259.2</b>
<b>Balance as at January 1, 2021</b>	<b>1,330.6</b>	<b>476.4</b>	<b>(132.2)</b>	<b>440.7</b>	<b>(27.9)</b>	<b>1,171.6</b>	<b>3,259.2</b>
Profit for the year	-	-	-	-	-	563.7	563.7
Other comprehensive income / (loss)	-	-	-	-	(4.9)	-	(4.9)
<b>Total comprehensive income / (loss)</b>	-	-	-	-	(4.9)	563.7	558.8
Cancellation of treasury shares (Note 16)	(38.0)	(13.6)	168.1	-	-	(116.5)	-
Dividend distribution (Note 18)	-	-	-	-	-	(426.2)	(426.2)
Acquisition of treasury shares (Note 16)	-	-	(193.0)	-	-	-	(193.0)
Share option plans	-	(0.2)	-	-	-	-	(0.2)
<b>Balance as at December 31, 2021</b>	<b>1,292.6</b>	<b>462.6</b>	<b>(157.1)</b>	<b>440.7</b>	<b>(32.8)</b>	<b>1,192.6</b>	<b>3,198.6</b>

# Cash Flow Statements

STATEMENTS OF CASH FLOWS (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro)	NOTES	GROUP		COMPANY	
		2021	2020	2021	2020
<b>Cash flows from operating activities</b>					
Profit before tax		719.4	283.1	699.3	481.0
Adjustments for:					
Depreciation, amortization and impairment	4,5,7,8	667.6	833.2	364.8	363.0
Costs related to voluntary leave schemes	20	(121.8)	132.6	(129.9)	117.8
Provision for staff retirement indemnities	20	(5.0)	3.0	5.6	1.7
Provision for youth account	20	(1.7)	1.3	(1.7)	1.3
Foreign exchange differences, net		(1.5)	3.6	(1.7)	1.0
Interest income		(1.0)	(1.7)	(1.1)	(2.2)
Dividend income	9	-	-	(200.9)	(331.0)
(Gains) / losses from investments and other financial assets – Impairment	9,13	50.4	(9.8)	(42.5)	90.4
Interest and related expenses		45.0	56.2	30.9	47.6
Working capital adjustments:					
Decrease / (increase) in inventories		(11.3)	10.2	(1.7)	1.0
Decrease / (increase) in receivables		(66.6)	54.5	(71.0)	35.1
(Decrease) / increase in liabilities (except borrowings)		89.2	51.3	64.0	(29.9)
Plus / (Minus):					
Payment for voluntary leave schemes	20	(56.3)	(109.1)	(44.6)	(94.7)
Payment of staff retirement indemnities & youth account, net of empl. contributions	20	(10.3)	(12.4)	(9.7)	(11.6)
Interest and related expenses paid (except leases)		(27.7)	(46.7)	(24.0)	(43.7)
Interest paid for leases	5	(15.4)	(19.0)	(6.4)	(13.4)
Income tax paid		(115.5)	(88.2)	(7.3)	(74.6)
Net cash flows from operating activities of discontinued operations		86.7	105.8	-	-
<b>Net cash flows from operating activities</b>		<b>1,224.2</b>	<b>1,247.9</b>	<b>622.1</b>	<b>538.8</b>
<b>Cash flows from investing activities</b>					
Return of capital invested in subsidiary	9	-	-	1.0	0.4
Investment in subsidiaries	9	-	-	(61.9)	(4.0)
Sale or maturity of financial assets	13	0.3	0.3	-	-
Repayment of loans receivable	20	7.2	7.2	7.2	7.2
Loans granted to subsidiary		-	-	-	(6.0)
Repayment of loans granted to subsidiary		-	-	-	6.2
Purchase of property, plant and equipment and intangible assets		(586.0)	(667.8)	(317.5)	(338.9)
Proceeds from disposal of subsidiaries / investments	9	288.3	-	288.3	-
Cash and cash equivalents of subsidiaries disposed	9	(89.3)	-	-	-
Movement in restricted cash		0.5	(0.1)	-	-
Interest received		1.0	1.7	1.1	2.2
Dividends received	28	-	-	311.8	260.7
Net cash flows from investing activities of discontinued operations		(57.5)	(71.4)	-	-
<b>Net cash flows from/ (used in) investing activities</b>		<b>(435.5)</b>	<b>(730.1)</b>	<b>230.0</b>	<b>(72.2)</b>

## OTE GROUP | CASH FLOW STATEMENTS | STATEMENTS OF CASH FLOWS (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro)	NOTES	GROUP		COMPANY	
		2021	2020	2021	2020
<b>Cash flows from financing activities</b>					
Acquisition of treasury shares	16	(190.3)	(142.3)	(190.3)	(142.3)
Proceeds from loans granted and issued	19	350.0	367.4	451.5	420.8
Repayment of loans	19	(404.4)	(874.3)	(446.2)	(894.6)
Lease repayments	5	(70.0)	(63.5)	(37.2)	(47.7)
Dividends paid to Company's owners	18	(426.1)	(257.9)	(426.0)	(257.9)
Net cash flows from financing activities of discontinued operations		(5.7)	(13.2)	-	-
<b>Net cash flows used in financing activities</b>		<b>(746.5)</b>	<b>(983.8)</b>	<b>(648.2)</b>	<b>(921.7)</b>
<b>Net increase / (decrease) in cash and cash equivalents</b>		<b>42.2</b>	<b>(466.0)</b>	<b>203.9</b>	<b>(455.1)</b>
<b>Cash and cash equivalents, at the beginning of the year</b>		516.2	1,058.3	105.5	560.6
Net foreign exchange differences		(1.0)	(2.8)	-	-
Transfer to sectors	9	-	-	(35.4)	-
Cash and cash equivalents of disposal group classified as held for sale		73.3	(73.3)	-	-
<b>Cash and cash equivalents, at the end of the year</b>	<b>15</b>	<b>630.7</b>	<b>516.2</b>	<b>274.0</b>	<b>105.5</b>

## Economic Value Distribution

OTE Group strives to create value through its operations for its shareholders, investors, employees, government authorities and local communities and subsequently allocate its created wealth to them accordingly.

### DIRECT ECONOMIC VALUE IN 2021 (IN MILLIONS €) WHERE...

		OTE GROUP	OTE
GENERATED	<b>Total revenues</b>	<b>3,368.3</b>	<b>1,600.7</b>
	Operating costs*	1,588.8	819.5
	Employee wages and benefits**	308.8	(38.7)
DISTRIBUTED	Dividends paid to company's owners	426.1	426.0
	Income tax paid	115.5	7.3
	Social contribution	2.7	1.1
RETAINED		<b>926.4</b>	<b>385.5</b>

\* Excluding employee wages and benefits, Depreciation, Amortization and Impairments

\*\* Personnel costs and costs related to voluntary leave schemes

OTE GROUP 2021  
TAXES & INSURANCE  
CONTRIBUTION IN GREECE



€908.84m

# Taxonomy-Related Disclosures

The scope of the EU Taxonomy Regulation (EE) 2020/852 (“Regulation”) is to establish a common set of criteria for determining whether an economic activity qualifies as environmentally sustainable.

It aims to create a common criteria and understanding on sustainable activities and investments in view of the EU Green Deal and the targets/ goals set. The Taxonomy Regulation is a key component of the European Commission’s action plan to redirect capital flows towards a more sustainable economy.

The EU Taxonomy is a classification system for environmentally sustainable economic activities.

Currently, criteria have been established for the environmental goals of climate change mitigation and adaptation. The Regulation, among others, defines specific reporting requirements and this section provides information for OTE Group activities according to these requirements. The below consolidated disclosure are provided for the purposes of the simplified reporting requirements pursuant to Art. 10 (2) of the Art. 8 Delegated Act (Commission Delegated Regulation (EU) 2021/2178).

OTE Group offers a wide range of services: fixed and mobile telephony, broadband services, pay television and integrated ICT solutions.

Taxonomy-eligible economic activity means an economic activity that is described in the delegated acts supplementing the Taxonomy Regulation. Considering the activities defined in the Regulation for “the Information and

Communication” economic activity sector, the taxonomy eligible activities of OTE Group fall under the category 8.1 (Data processing, hosting and related activities) for climate change mitigation and adaptation goals, and category 8.2 (Data-driven solutions for GHG emissions reductions) for the climate change mitigation goal.

In selecting solutions / services under the above-mentioned categories, emphasis has been given to the ones that have the potential for emissions reductions at the user side. Category 8.1 includes projects offering storage, management, control, transmission and processing of data through physical co-location data centers or cloud applications such as smart / digital office and “one email”. The activities included in Category 8.2 are related to “Smart City” solutions offered for more efficient use of public lighting, parking control or “IoT” (Internet of

Things) for fleet management and asset management.

It is noted that the Regulation does not include an activity related to telecom network operation and therefore OTE Group core business activity cannot be presented as a taxonomy eligible activity.

The below table presents the share of the Group’s turnover, capital expenditure (Capex) and operating expenditures (Opex) for the reporting period 2021, which are associated with Taxonomy-eligible economic activities, in accordance with Art. 8 Taxonomy Regulation and Art. 10 (2) of the Art. 8 Delegated Act.

The Group determined the Taxonomy-eligible KPIs in accordance with the legal requirements and describe its accounting policy in this regard as follows:

## Turnover KPI

The proportion of Taxonomy-eligible economic activities in the total turnover has been calculated as the part of net turnover derived from services associated with Taxonomy-eligible economic activities (numerator) divided by the net turnover (denominator), both for the financial year 2021. The denominator of the turnover KPI is based on the consolidated net turnover in accordance with IAS 1.82(a). Specifically, the total amount of OTE Group’s Turnover can be reconciled with “Total revenues” in the **Income Statements (Consolidated and Separate)** section of the Annual Financial Statements (Consolidated and Separate).

## Capex KPI

It is defined as Taxonomy-eligible Capex (numerator) divided by total Capex (denominator).

		Turnover		Capital Expenditure		Operating Expenditures	
		€	%	€	%	€	%
<b>OTE Group</b>		<b>3,368.3</b>	<b>100%</b>	<b>665.0</b>	<b>100%</b>	<b>1,897.6</b>	<b>100%</b>
<b>of which: taxonomy eligible economic activities</b>	8.1. Data processing, hosting and related activities*	9.6	0.3%			6.5	0.3%
	8.2. Data-driven solutions for GHG emissions reductions	9.1	0.3%			3.6	0.2%
	<b>Total</b>	<b>18.7</b>	<b>0.6%</b>	<b>0.0</b>	<b>0%</b>	<b>10.1</b>	<b>0.5%</b>
<b>of which: taxonomy non eligible economic activities</b>		3,349.6	99.4%	665.0	100%	1,887.5	99.5%

\* T-Systems is covered by Deutsche Telekom Group relevant reporting. OTE Group reports on 8.1 due to national relevance.



OTE GROUP | TAXONOMY-RELATED DISCLOSURES

Total Capex consists of additions to tangible and intangible fixed assets during the financial year, before depreciation, amortisation and any re-measurements, including those resulting from revaluations and impairments. It includes additions to fixed assets, intangible assets and right-of-use assets and additions resulting from business combinations. Taxonomy-eligible Capex is not applicable as these services are sold to third parties and are not used for own use.

The total amount of Capital Expenditure is determined based on the Consolidated Balance Sheet and result from the sum of the following key items in the “Notes to the annual financial statements as of December 31, 2021 and for the year then ended”: The line “Additions and transfers” including the line “Disposal and transfers –cost” of categories “Construction in progress” and “Investment supplies” of **“Property, plant and equipment”** (Note 4), and the line “Additions” in **“Leases”** (Note 5), **“Telecommunication licenses”** (Note 7), and **“Other intangible assets”** (Note 8).

**Opex KPI**

This KPI is defined as Taxonomy-eligible Opex (numerator) divided by total Opex (denominator). The EU taxonomy’s definition of relevant operating expenditures includes expenses for research and



development, building refurbishment, maintenance and repair and other direct expenses relating to the day-to-day servicing of assets of property, plant and equipment.

The related cost items can be found in various line items in the Income Statements (Consolidated and Separate) section of the Annual Financial

Statements (Consolidated and Separate).

The total amount of OTE Group’s Operating Expenditures is presented as “Total operating expenses before depreciation, amortization and impairment” in the **Income Statements (Consolidated and Separate)** section of the Annual Financial Statements (Consolidated and Separate).

The accounting policies related to the compilation of the table above are presented in the Note 3 **“Significant Accounting Policies”** of the Annual Financial Statements (Consolidated and Separate) as of December 31, 2021. The financial statements have been prepared in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union (EU). The Group uses various information systems and internal control checks to ensure a comprehensive accounting framework for revenue recognition. Revenue from customer contracts is recognized when the customer acquires control of the goods or services to a degree that reflects the price that the Group or the Company expects to be entitled to in respect of those goods or services.

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*This section was included for the first time in the Non-Financial Report, as foreseen by Regulation (EU) 2020/852. The information presented, follows the requirements defined by the Regulation and the delegated acts issued. The relevant guidance leaves room for interpretation and is evolving, and as a result OTE Group will monitor the developments and will adjust its approach regarding the assumptions and the methodology it applies.*

# 2021 ESG Highlights

## E

### Environmental

Recognizing that environmental issues are increasingly at the forefront of global sustainability agenda, OTE Group has consistently aimed to appropriately manage and address any potential impacts on the environment which may be caused by its business and operations. Especially within the telecommunications industry, there has been a growing focus on environmental aspects such as energy consumption, compliance with environmental standards and regulatory requirements, life-cycle of technology products, etc. OTE Group fully comprehends that climate change and environmental issues are a global challenge which requires the collective contribution of multiple stakeholders to achieve the ambitious set goals. Aiming to further minimize the potential negative impacts associated with its operations, while also building on its strategic vision and contributing to digitalization, OTE Group has increased its focus in the environmental arena, highlighted within this year's report. Energy and Climate Change, Circular Economy and Electromagnetic fields are the most prominent aspects of OTE Group's approach to environmental excellence.



-88%

**TOTAL DIRECT AND  
INDIRECT (FROM  
ENERGY) GHG  
EMISSIONS, COMPARED  
TO 2017**



A/A-

**LEADERSHIP A/A-  
CATEGORY IN THE CDP  
ON CLIMATE CHANGE**



>2m

**PIECES OF SINGLE  
USE PLASTIC ITEMS  
WAS AVOIDED  
(GREECE)**



Zero

**ICT WASTE<sup>1</sup>**

1. Sustainable management of waste generated from telecom & retail network, buildings and datacenters



## 2021 ESG Highlights

**Social**

OTE Group places a strong emphasis on its ability to contribute to a better world for all through technology. Highlighting its efforts to positively contribute to the society in which it operates, this year, the Group's societal contribution has been presented in three pillars (Employees, Customers, Society) each one relating to the stakeholder groups benefitting from OTE Group's commitment to contributing to a better world for all. OTE Group provides a safe, positive, and technologically advanced working environment for all its employees fostering a culture of growth, recognizing talent, and offering fair, equal and unlimited opportunities for development whilst cultivating a mindset of lifelong learning. Regarding customers, OTE Group continuously enhances the digitalization capabilities and technology solutions offered to its customers aiming to increase access to technological infrastructure for all, always prioritizing on the safe and responsible use of technology as well as the satisfaction of its customers. Last but not least, OTE Group strives to meet the contemporary core societal needs through its broad range of ongoing programs and new initiatives. With technology at the centre of everything it does, and specifically as the foundation of its social contribution, OTE Group is able to provide the enablers towards an equal digital society.



€2.7m

**SOCIAL CONTRIBUTION**

~4.1m

**BENEFICIARIES**

2.6m

**FROM DIGITAL  
INCLUSION INITIATIVES**

€908.84m

**TAXES & INSURANCE  
CONTRIBUTION**

~€5bn

**IN NEW TECHNOLOGIES &  
INFRASTRUCTURE\***

&gt;€3bn

**INVESTMENT PLAN  
UNTIL 2027**

560k

**FTTH LINES**

60%

**NATIONWIDE  
5G COVERAGE**

11,038

**EMPLOYEES  
AT OTE GROUP**

19,459

**PARTICIPATIONS IN  
EDUCATIONAL PROGRAMS**

4

**EMPLOYEE SURVEYS  
IN 2021**

\* Over the past decade





## 2021 ESG Highlights

## G

**Governance**

As the foundational driver of its business and operations, OTE Group aims to consistently exemplify strong corporate governance in the context of a solid Internal Control System. Beyond compliance with all relevant legislation and regulatory requirements, OTE Group has set up a comprehensive governance structure, including all relevant controls, management systems and mechanisms to ensure the smooth and effective management of its operations. Sustainability is an inherent element of OTE Group's governance model, business strategy and organizational structure. Sound corporate governance, responsible business and ethical conduct encapsulating a multitude of aspects such as risk and compliance management, business continuity, responsible purchasing and supply chain, human rights, security and data privacy formulate OTE Group's integrated approach to Governance.



1st

**COMPANY IN GREECE RECOGNIZED AS ONE OF "WORLD'S MOST ETHICAL COMPANIES" BY THE ETHISPHERE INSTITUTE, FOR A SECOND CONSECUTIVE YEAR.**



1

**RISK MANAGEMENT TOOL (TELEKOM RISK MANAGEMENT SOLUTION/TRMS) FOR ALL OTE GROUP COMPANIES.**



0

**COURT CONVICTIONS FOR CORRUPTION ISSUES AGAINST OTE GROUP OR ITS EMPLOYEES IN RELATION TO THEIR PROFESSIONAL ACTIVITIES.**



100%

**OF PROSPECTIVE CONSULTANTS WERE CHECKED, REGARDLESS OF THE PURCHASE VALUE. 1,538 INTEGRITY CHECKS OF SUPPLIERS, CONSULTANTS AND PARTNERS**



&gt;4,600

**GROUP EMPLOYEES PARTICIPATED IN THE COMPLIANCE TRAINING PROGRAM**







# Environment

A/A-

LEADERSHIP CATEGORY IN THE CDP ON CLIMATE CHANGE

>2m

PIECES OF SINGLE-USE PLASTIC ITEMS WERE AVOIDED (GREECE)

-88%

TOTAL DIRECT AND INDIRECT (FROM ENERGY) GHG EMISSIONS, COMPARED TO 2017

ZERO

ICT WASTE\*

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*\*Sustainable management of waste generated from telecom & retail network, buildings and datacenters*



# 1.1 Environmental Strategy



OTE GROUP FULLY UNDERSTANDS THAT, THOUGH LOW, THERE ARE ENVIRONMENTAL IMPACTS ASSOCIATED WITH INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT) ACTIVITIES

At the same time, it is commonly acknowledged that digitalization is a key tool to achieve UN Sustainability Goals, mitigate GHG emissions and address environmental challenges at local, regional and global level.

The OTE Group Environmental Strategy, aligned with its business strategy, aims at:

- The minimization of the environmental impacts from its activities across its value chain.
- The development and provision of products and services that enable protection of the environment and increase productivity in other sectors of economic activity.
- Raising its stakeholders' awareness on acting more responsibly on all aspects of environmental protection.

To achieve these objectives, the Group acts at different levels to:

- Analyze environmental risks and opportunities.
- Address climate change through energy efficiency improvements and Renewable Energy Sources use.
- Integrate the principles of circular economy into its activities to improve resources efficiency.
- Develop specialized ICT products and services that meet customers' needs while contributing to environmental protection.

- Ensure that the levels of electromagnetic fields of its base stations comply with the public exposure safety limits.
- Develop awareness initiatives for its stakeholders and implement environmental sponsorship programs through strategic partnerships.
- Contribute / participate, autonomously or as a member of DT Group, in initiatives addressing

- sustainability and climate change (e.g., UN Global Compact, RE100, Race to Zero campaign, Global Sustain)
- Secure high ratings by international sustainability and SRI analysts.

Aiming at effective environmental management along the entire value chain, companies of OTE



## 1. ENVIRONMENTAL | 1.1 ENVIRONMENTAL STRATEGY

Group (see [Appendix](#) for more information) implement, in the context of the **Integrated Management System**, Environmental Management Systems (EMS) certified according to ISO 14001 standard and Energy Management Systems certified according to ISO 50001 standard (Greece). The systems share similar structure, approach and **policy**, in which the commitment of OTE Group companies to environmental protection is fully incorporated.

The recent unprecedented conditions brought about by the pandemic crisis and the response to it (lockdown, mobility restrictions, teleworking), did not affect noticeably the performance of the EMS.

Utilizing the framework of the Environmental Management System, the Companies:

- Analyze all activities, products and services with reference to applicable legislative requirements and to their impact on the environment (energy consumption, emissions, waste, electromagnetic radiation, etc.).
- Set goals and specify appropriate key quantitative performance indicators (KPIs).
- Take cost-effective actions to improve environmental performance.

### Governance of Environmental Management System

Governance of Environmental Management System is part of the Sustainability Governance Model which is reflected in the current OTE Group Sustainability Policy. The OTE Board of Directors, reaffirming the importance of sustainability to the OTE Group, approves the Group-wide Sustainability

Strategy on ESG issues and is updated on the Company and Group's performance, exercising relevant supervision. The OTE Board of Directors has tasked the Chairman and CEO, the Company's supreme executive body, to ensure the Group's commitment to Sustainability. OTE Group' goal for sustainable development binds all subsidiaries throughout the Group. More information is available in the section **Sustainability Governance**.

Environmental Management Representatives are appointed by Decisions of the CEO in each country. The Executive Director Corporate Communications & Sustainability OTE Group is responsible for the operation of the EMS in Greece.

The Group's executives are systematically informed by the EMS' representatives about its actions, objectives and programs.

### Environmental Risk Assessment

The Group activities have an impact on the environment and are affected by environmental challenges (e.g. climate change). Environmental risk assessment (following a life-cycle perspective) is a tool for the early identification of risks and opportunities associated with the activities of the companies and their effective management. To ensure consistency among all types of enterprise risks and opportunities evaluated, the **OTE Group Enterprise Risk Management** methodology is applied. The Group's Risk Landscape environmental risk assessment, together with the materiality analysis, provide input the Group's Risk Landscape and the Enterprise Risk Management reporting.

### ENVIRONMENTAL STRATEGY



## 1. ENVIRONMENTAL | 1.1 ENVIRONMENTAL STRATEGY

In the context of the assessment, electricity consumption, Greenhouse gas (GHG) emissions and waste management (especially hazardous) along the value chain, as well as EMF have been recognized as significant environmental issues. In addition, climate change impacts were ranked high as risk and opportunity factors albeit with varying timeframe (from “already happening” to long-term).

Current legislation affects the operation of the OTE Group through increased energy prices and operational cost to ensure compliance with more advanced regulations. In view of the EU Green Deal, it is expected that climate regulation in EU would provide additional restrictions to achieve GHG emissions reduction at the levels required.

- Aiming at climate change mitigation, EU has set as its target the reduction of GHG emissions by at least 55% by 2030, compared to 1990 levels, and aims at zero net emissions by 2050. Both targets are now legally binding with the adoption of the EU Climate Law.
- In July 2021 the European Commission released a series of legislative proposals (“Fit for 55”) setting out how it intends to achieve its climate targets. Moreover, the European Commission is in the process of establishing through its Taxonomy Regulation and its delegated acts criteria for

determining whether an economic activity qualifies as environmentally sustainable for the purposes of establishing the degree to which investing in it is also environmentally sustainable.

- Following along these lines, in November 2021, a public consultation process was initiated on the Greek Climate Law (ended on 28.01.2022) that aims to provide the framework for Greece to also achieve an 80% reduction by 2040 on the way to a net-zero emissions target by 2050.

At the same time, climate regulation is expected to introduce incentives to enable the transition to a low / zero carbon economy. The EU Taxonomy is a tool towards this direction. In this context, Technology is mainly an opportunity factor since ICT services (e.g., energy management, dematerialization, smart grids, etc.) can be utilized to increase resources efficiency and reduce carbon emissions of clients. In 2021, revenues from ICT products and services continued to increase (+9.2% compared to 2020).

The transition to a low carbon economy

- Requires significant changes in established production and consumption patterns. This could result in higher procurement prices as the suppliers will try to shift higher costs for product development and production to their customers. Scope 3 emissions provide an indication of the

exposure to risks associated with the supply chain.

- May also affect reputation as Society is becoming more concerned with the problem of climate change. The climate change strategy of a company, including its supply chain management, the footprint of products and services provided, the integration of climate change aspects in planning (e.g., telecom network development and availability) are gradually shaping the overall image of an enterprise. Additionally, the climate change strategy of a company and the footprint of products and services provided are gradually considered an important selection criterion among similar products / services.

With respect to physical impacts, telecom infrastructure could be affected by extreme weather events (e.g., floods) and forest fires that may lead to network disruption. The increased temperature, as foreseen by climate models, would result in increased cooling needs and therefore increased energy (electricity) consumption especially in buildings but also in technical facilities, while existing equipment may need to be replaced earlier than expected (e.g., due to the change of outdoor temperatures vs. design temperatures). At the same time, early warning systems and advanced information and management systems based on telecom services

can help in effectively addressing climate change impacts and developing adaptation capacity.

Environmental and climate change risks and opportunities are influencing business strategy as well as financial planning. To manage risks and opportunities, OTE Group has put in place, a number of policies – measures – actions that include, among others, the Business Continuity Management System, revenues transformation towards ICT solutions, the suppliers’ Code of Conduct, engagement with its suppliers, the adoption of ambitious emission reduction targets, energy conservation measures targeting all activities, waste management practices following circular economy principles and participation in the Code of Conduct for Broadband Equipment. In addition, and in order to consolidate its technological superiority, OTE Group systematically supports research and promotes innovation, with multiple benefits for society, customers and employees.



Detailed information on climate change risks and opportunities identified, following **TCFD** (Task force on Climate-related Financial Disclosures) recommendations, is available in the latest response of OTE to **CDP**.

# 1.2 Energy and Climate Change

## WHY IT MATTERS

OTE Group recognizes that climate change is a global environmental problem, the impacts of which affect its operation and stakeholders, and the whole range of economic activities as well as life on the planet (see [Annual Financial Report 2021](#)). Climate is changing, global temperature is increasing, and urgent global action is needed. OTE Group has in place a climate change strategy with ambitious targets that addresses mitigation activities across its value chain.

The EU Green Deal sees digital technologies as a critical enabler for a zero-carbon economy and at the same time calls the ICT sector to put sustainability at its heart.

OTE Group has developed an integrated climate change strategy that is aligned with its business strategy. In line with the DT Group, the climate change strategy is structured along 4 main pillars:

## CLIMATE CHANGE STRATEGY PILLARS



### VALUE CHAIN EMISSIONS

OTE Groups monitors energy consumption across its operations and calculates value chain GHG emissions according to the Greenhouse Gas Protocol. The majority of emissions from own operations comes from electricity consumption, while upstream and downstream activities are the main sources of total value chain emissions. The climate change strategy of OTE Group addresses all potential sources of emissions (own operations, upstream and downstream activities). Ambitious emissions reduction targets are in place together with appropriate measures to achieve them.



### RENEWABLE ENERGY

Renewable Energy Sources (RES) are a key tool for the decarbonization of the economy. OTE Group (Greece) acted early and is securing, for more than 10 years, from its electricity providers, Guarantees of Origin (GOs), assuring that the listed amount of electricity consumption has been produced from Renewable Energy Sources. In 2021 OTE Group sourced 100% of its electricity consumption from RES.



### ENERGY EFFICIENCY

The majority of OTE Group energy requirements come from operating its telecom network infrastructure. To handle growing amounts of data and improve the speed and quality of data transmission, the capacity and performance of the network is continuously increased. To ensure that energy consumption grows much less than the amounts of data transmitted (decoupling), appropriate metrics are monitored, and various measures are implemented targeting all energy consuming activities but with an emphasis on network operation (e.g., updating network infrastructure, improving energy management practices, and using more energy-efficient technology). This would allow OTE Group to be better prepared to operate in a zero-carbon economy.



### ICT PRODUCTS AND SERVICES

Global warming of 1.5°C would require not only greater but also faster emission reductions. For example, the EU Green Deal aims at climate neutrality by 2050 and has enhanced ambition for 2030, by increasing emissions reduction to at least 55% (from 40%) below 1990 levels. OTE Group is fully aware of the ICT enabling role in tackling climate change and the opportunities this role offers for its further development and is developing products and services to realize this potential.



## DT GROUP-WIDE **CLIMATE PROTECTION TARGETS**

### **NET-ZERO EMISSIONS FROM ENERGY CONSUMPTION BY 2025**

Including up to 95% reduction of emissions from energy consumption by 2025 compared with 2017 (base year). This includes direct emissions from the consumption of natural gas, diesel and petrol, as well as indirect emissions from electricity consumption.

### **100% USE OF RENEWABLE ENERGY SOURCES**

For electricity consumption, from 2021 onwards.

### **25% REDUCTION OF INDIRECT EMISSIONS PER CUSTOMER BY 2030**

This includes indirect emissions from production of products (supplier emissions) and the use of products by customers.

### **NET-ZERO CARBON FOOTPRINT BY 2040**

This includes emissions from production of products (supplier emissions), to our operations and the use of products by customers.

OTE Group is committed to participate fully towards the achievement of the DT Group wide net zero targets.

## 1. ENVIRONMENTAL | 1.2 ENERGY AND CLIMATE CHANGE

## Value Chain Emissions

### Monitoring energy consumption

Total energy consumption of OTE Group in 2021 amounted to 604.1 GWh, with electricity consumption accounting for almost 90% of total consumption. In line with the distribution of revenues per country of operation, Greece accounts for 82% of total energy consumption and Romania accounts for the rest 18%.

Energy consumption decreased by 2.5% compared to 2020, mainly due to the decrease of energy consumption in the telecom network at Group level (about 3% compared to 2020). This decrease is partially offset by the increase in energy consumption for stand-alone or stand-by electricity generators (19% compared to 2020) and vehicles (2.5% compared to 2020).

The expansion and modernization of the telecom network together with energy efficiency improvements in its operation counterbalance the increased traffic activity, as depicted in the volume of data transferred which increased by 29% or the number of subscribers (e.g., in Greece fiber service subscribers increased by 21.6% and TV subscribers increased by 8.5%, compared to 2020). Decoupling of services' growth and energy consumption is in progress with positive results and emphasis is given to achieve high implementation rates of energy conservation measures towards this direction.

### Greenhouse gas emissions

OTE Group direct (scope 1) and indirect (scope 2, market-based i.e., by taking into account the

Guarantees of Origin secured) GHG emissions from energy consumption in 2021, amounted to 16,394 t CO<sub>2</sub> eq, that is 88% lower compared to 2017 levels, while emissions in **Greece were about 85% lower than 2017 levels**. The significant decrease of emissions at OTE Group level in 2021 (in 2020 the decrease compared to 2017 was about 60%) is mainly attributed to Guarantees of Origin secured by Telekom Romania Mobile Communications that cover for the first time 100% of its electricity consumption.

Following the location-based approach for Scope 2 emissions (i.e., using an average grid emission factor), energy consumption emissions are estimated at 268,114 t CO<sub>2</sub> eq, down by 9% compared to 2020.

Total GHG emissions (i.e., including f-gases fugitive emissions and considering market-based scope 2 emissions) were estimated at 25,453 t CO<sub>2</sub> eq, which is a **60% decrease compared to 2020**.

For 2021, indirect (scope 3) GHG emissions were estimated at about 750 kt CO<sub>2</sub> eq at Group level, with operations in Greece accounting for 78% of total scope 3 emissions. More than 90% of scope 3 emissions are associated with suppliers' emissions during production of end devices, equipment, etc. (categories 1 and 2 according to GHG Protocol) and customers' emissions during the use of products and services (categories 11 and 13 according to GHG Protocol). These four categories are addressed under the DT Group-wide targets for GHG emissions reduction. Since 2017 scope 3 emissions in Greece decreased by almost 40%.

As a result of the distribution of emissions between the scope 3 categories (as defined by the GHG Protocol), measures to reduce the footprint of OTE Group activities across its value chain focus on suppliers (emissions associated with the Purchase of goods and services and the Capital goods acquired by OTE Group) and Customers (emissions from the use of products sold or leased).

To address suppliers' emissions, OTE Group, as a member of DT Group, makes use of initiatives led by DT (with which it shares common major suppliers) concerning supplier engagement to GHG emissions reduction targets. Emphasis is given to working with suppliers of end-use telecom devices and telecom infrastructure.

Energy efficiency is the main priority for reducing customers' emissions (i.e., from electricity consumption). In this, OTE voluntarily participates (since September 2010) in an initiative established by the European Commission for maximizing energy efficiency of broadband equipment ("Code of Conduct on Energy Consumption of Broadband Equipment", BB CoC) both on the customer and the network side. Signatories of the BB CoC agree to make all reasonable efforts to achieve the power consumption targets for an at least 90% reduction in the new-model items introduced to the market. Signatories cooperate with the European Commission and Member State authorities in an annual review of the scope of the BB CoC and the power consumption targets for future years.

Avoided Scope 3 GHG emissions are estimated at

9,600 t CO<sub>2</sub> eq (Greece). This estimation takes into account paper recycling, reduction of paper, use of teleconferences for internal operational needs and the impact of the refurbishment of end use devices.

## Renewable Energy Sources

OTE Group considers Renewable Energy Sources (RES) a key tool for the decarbonization of its operations.

OTE Group has secured (for the 11<sup>th</sup> consecutive year for Greece), from its electricity providers for 2021, Guarantees of Origin (GOs), assuring that the listed amount of electricity consumption has been produced from Renewable Energy Sources. **The GOs secured coverage of 100% of the 2021 electricity consumption of the Group**. That means that the relevant target of the climate change strategy **has been achieved at OTE Group level, while for Greece it has been achieved one year earlier**.

RES electricity generation (autonomous photovoltaic units in 16 base stations, small wind turbine systems in 5 base stations and 2 roof-top photovoltaic systems of 222 kWp installed capacity) in 2021 amounted to about 580 MWh in Greece. In Romania, OTE Group RES electricity generation is estimated at 1,054 MWh.



## 1. ENVIRONMENTAL | 1.2 ENERGY AND CLIMATE CHANGE

## Energy Efficiency

Priorities for improving energy efficiency concern:

- **Telecom networks**, aiming at the transition to a more energy efficient network.

Measures to increase energy efficiency in telecom networks include, among others, the removal of unused equipment in the fixed network, the increase/automation of the air-conditioning temperature set point, the replacement of equipment with new, more efficient ones, the deactivation of capacity layers in low traffic periods. Emphasis is also given to the electricity generators, especially those covering the needs of stand-alone base stations (24-hour operation). Grid connection as well as conversion to a hybrid status making use of RES are under consideration, while an annual maintenance program is in place.

- **Buildings, data centers and stores**, with emphasis on envelope upgrade and on the proper use and the efficient operation of the equipment installed.

There are initiatives in place to improve data centers efficiency. A bundle of measures is implemented targeting IT equipment (consolidation, virtualization, rack orientation, etc.), but also sites infrastructure (UPS systems, HVAC systems, automation and BMS systems) and cabling infrastructure. In 2021 the average Power Usage Efficiency (PUE) was improved by 7.7% compared to 2017. Efforts to reduce PUE values and improve efficiency are on-going as this would allow compensation for the increasing data traffic.



### ISO 50001 ENERGY MANAGEMENT SYSTEM IN GREECE

ISO 50001 Energy Management System, in combination with the existing ISO 14001 EMS, is a major tool for the implementation of energy conservation measures and the improvement of energy efficiency. The scope of the System is gradually expanded and in 2021, was implemented in 21 building complexes (including technology and office buildings, data centers, call centers, shops and the head office of the OTE Group) and 59 mobile telephony base stations. Results are encouraging since energy savings exceed 5% in buildings / shops, 10% in data centers and 15% in mobile base stations. The strategic aim of OTE Group, is to further enrich its portfolio with facilities certified according to ISO 50001.

With respect to buildings, emphasis is given in the design and implementation of major renovation in several critical buildings that aim at high-level environmental certification. At present 3 buildings have already achieved **LEED** certification at GOLD level.

- **Road transportation**, focusing on the fleet renewal with energy efficient vehicles, including plug-in hybrid electric vehicles (PHEV) or battery electric vehicles (BEV), but also on the monitoring and control of transportation activity.

The goal is to create, considering market and technology maturity, an eco-friendly fleet of vehicles, with capacity for battery charging of PHEVs and BEVs on a daily basis. In this context, more than 300 company vehicles are planned to be replaced with models with PHEV technology. By the end of 2021, 123 plug-in vehicles have been already incorporated in the fleet. In parallel a corporate charging network at the OTE Group's facilities is being developed, so that all vehicles can be charged. There is also provision for additional parking spaces for vehicle charging for the visitors of the Group facilities.

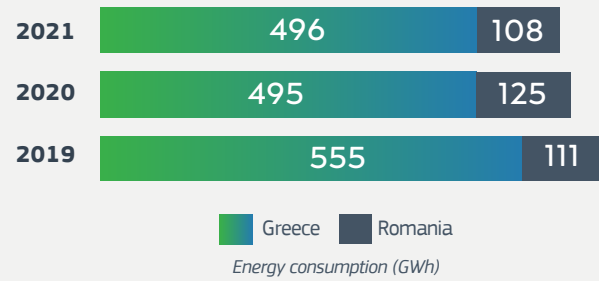
In 2021, the energy efficiency projects implemented resulted in an energy conservation of 17.8 GWh (3% of energy consumption in 2021), while avoided GHG emissions are estimated at 8.6 kt CO<sub>2</sub> eq.

As a result of the measures implemented, the efficiency of energy use in the telecom companies of the Group (i.e., total energy consumption per volume of data transferred) improved by about 58% compared to 2019, reaching a value of 76 kWh/TB in 2021 (64 kWh/TB in 2021 for Greece). The data traffic emissions intensity (location-based) reached a value of 34 kg CO<sub>2</sub> eq/TB (from 85 kg CO<sub>2</sub> eq/TB in 2019), while the market-based intensity (i.e., including the effect of the GOs secured) is estimated at 2 kg CO<sub>2</sub> eq/TB. Energy and GHG emissions intensities have also improved.

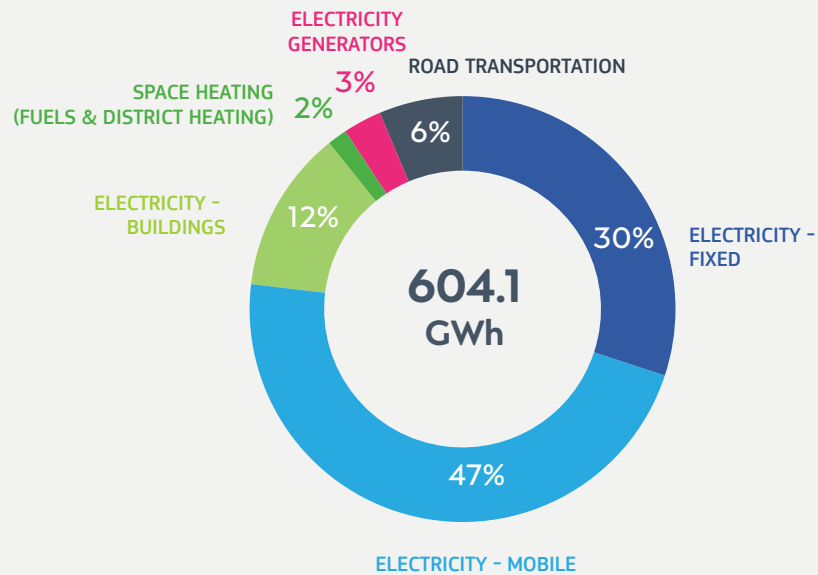
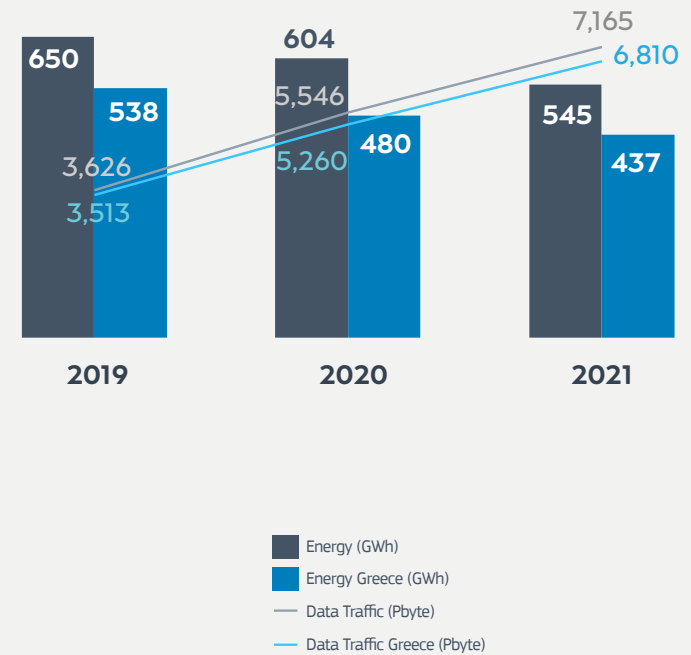
A detailed list of the measures implemented in 2021 is presented in the Appendix: **Environmental Performance Data – Energy**.



## 1. ENVIRONMENTAL | 1.2 ENERGY AND CLIMATE CHANGE

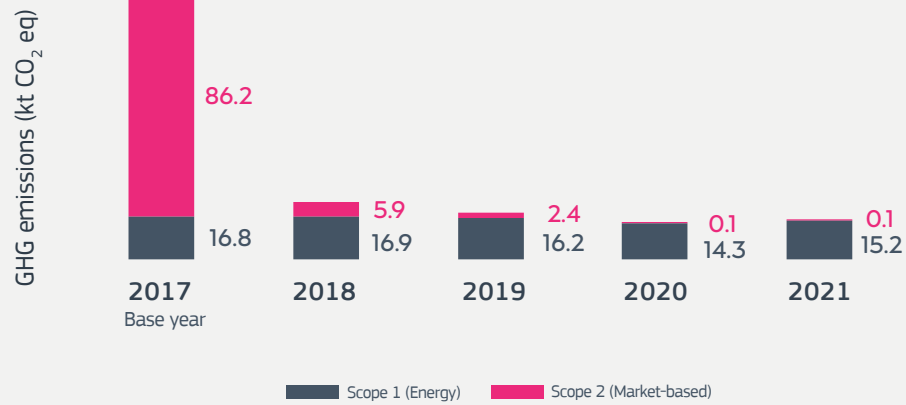
ENERGY CONSUMPTION OTE GROUP  
PER COUNTRY

## PER ACTIVITY

ENERGY CONSUMPTION  
& DATA TRAFFIC (GREECE)

1. ENVIRONMENTAL | 1.2 ENERGY AND CLIMATE CHANGE

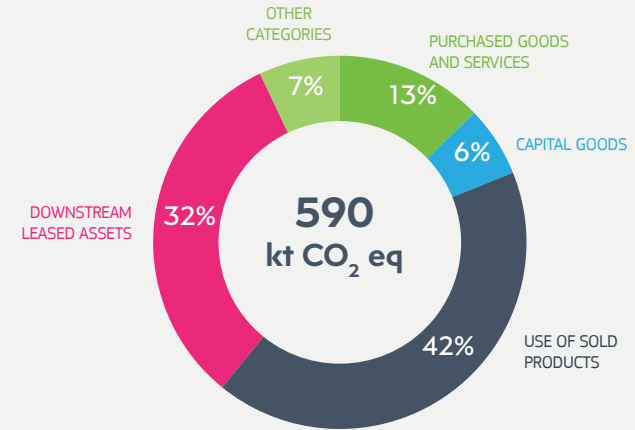
**GHG EMISSIONS FROM ENERGY**  
OTE GROUP (GREECE)



**GUARANTEES OF ORIGIN  
FOR 100% OF ELECTRICITY  
SECURED SINCE 2020**

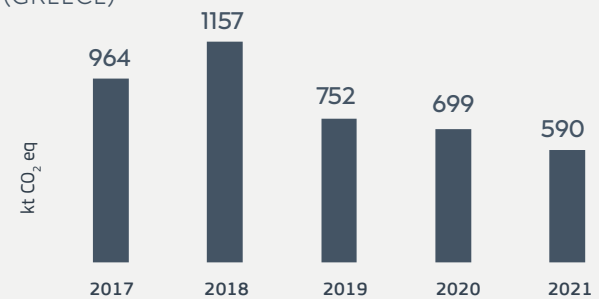


**SCOPE 3 EMISSIONS PER CATEGORY**  
OTE GROUP (GREECE)



1. Downstream leased assets concerns new and existing contracts for routers and receivers
2. "Other categories" include Fuel- and energy-related activities, business travel, waste generated in operations, employee commuting, upstream / downstream transportation & distribution and the End of life treatment of sold products

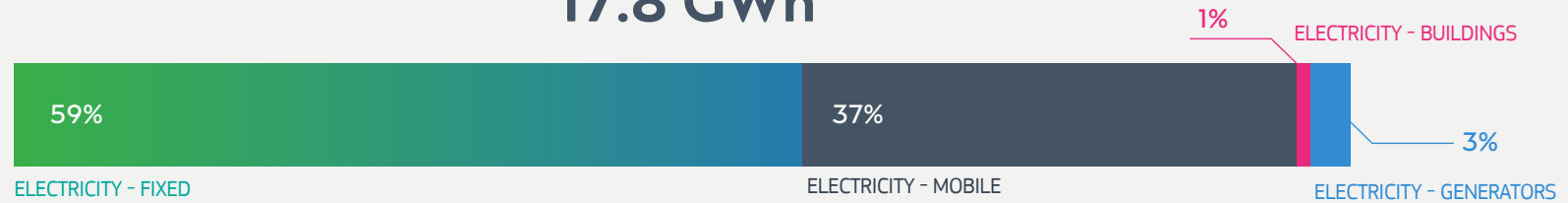
**SCOPE 3 EMISSIONS**  
OTE GROUP (GREECE)



1. ENVIRONMENTAL | 1.2 ENERGY AND CLIMATE CHANGE

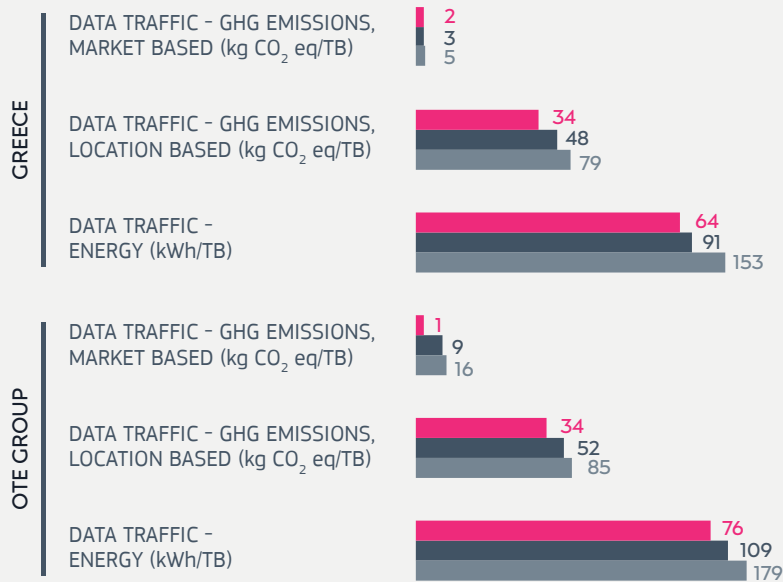
**ENERGY CONSERVATION**  
OTE GROUP

ENERGY CONSERVATION  
**17.8 GWh**



**DATA TRAFFIC INTENSITIES**

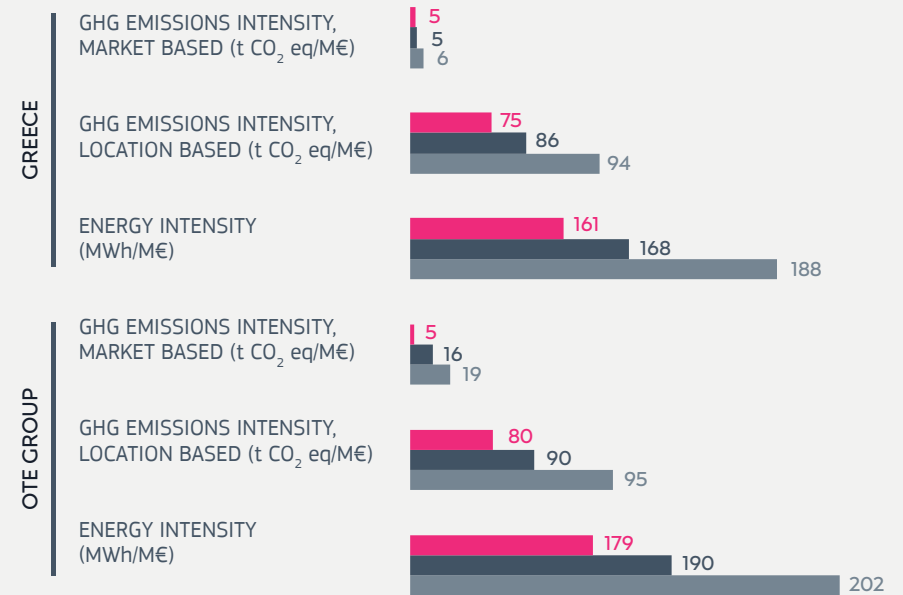
■ 2021 ■ 2020 ■ 2019



Data traffic intensity - Energy: Total energy per data transferred  
Data traffic intensity - Emissions: Scope 1 & 2 GHG emissions from Energy per data transferred

**ENERGY AND GHG EMISSIONS INTENSITIES**

■ 2021 ■ 2020 ■ 2019



Energy intensity: Total energy consumption per revenues  
GHG emissions intensity: GHG emissions from Energy per revenues

## 1. ENVIRONMENTAL | 1.2 ENERGY AND CLIMATE CHANGE



### ICT Products and Services

Holding the increase in the global average temperature to well below 2°C (Paris Agreement, December 2015), requires substantial emission reductions at global level. A global warming of 1.5°C would require not only greater but also faster emission reductions. The **Glasgow Climate Pact** notes that the impacts of climate change will be much lower at the temperature increase of 1.5°C (extreme events to double vs today) compared with 2°C (extreme events to triple), and it is therefore decided to pursue efforts to limit the temperature increase to 1.5 °C. To this end, it is necessary to reduce greenhouse gas emissions globally by 45%

by 2030 (with respect to 2010) and reach net zero emissions by mid-century in order to limit global warming to 1.5°C.

The EU Green Deal aims at climate neutrality by 2050 and has increased ambition for 2030, i.e., emissions reduction to at least 55% (from 40%) below 1990 levels. In this context, exploiting the available ICT potential becomes imperative. According to the GeSI **Digital with a Purpose** report, the ICT sector can enable GHG emissions reduction that are 7 times higher than the footprint of the sector in a business-as-usual scenario. This translates into an abatement potential of 668 Mt CO<sub>2</sub> eq in 2030 (about 1.3% of global emissions in 2030). Fiber services and 5G technologies have a

key role to play in this digital transformation.

OTE Group is fully aware of the ICT enabling role in tackling climate change and the opportunities this role offers for its further enhancement and is developing products and services that address this strategy (for further information see sections **Products and Services for Sustainability** and **Research and Innovation**). In this:

- Broadband services (broadband & mobile broadband) enhance connectivity while contributing to the reduction of transportation needs, to substitution of emissions-intensive products, processes, etc. (dematerialization), and to the development of e-commerce and e-governance.
- ICT services developed in collaboration with specialized companies and based on Internet of Things (IoT), Cloud and Big Data allow for:

- The utilization of fully customized computational resources without requiring investments in IT infrastructure.
- The management of a wide range of issues related to municipal operations, from car parking and street lighting to energy, waste and water management, and air quality monitoring.
- The monitoring and management of energy consumption.
- The monitoring and management of vehicle fleets as well as of driving behavior and performance.
- The smooth and efficient operation of hotels and hospital units (energy equipment, IT systems, services offered to customers etc.).



### GLOBAL TEMPERATURE IS INCREASING

According to the **IPCC report (2021)** "Each of the last four decades has been successively warmer than any decade that preceded it since 1850. Global surface temperature in the first two decades of the 21st century (2001–2020) was 0.99 °C higher than 1850–1900. Global surface temperature was 1.09°C higher in 2011–2020 than 1850–1900."

- The development of smart electricity grids (transmission and distribution) that will facilitate the large-scale penetration of RES electricity.
- The restriction of business travels by using the advanced telepresence infrastructure available (tele-/video-conference)

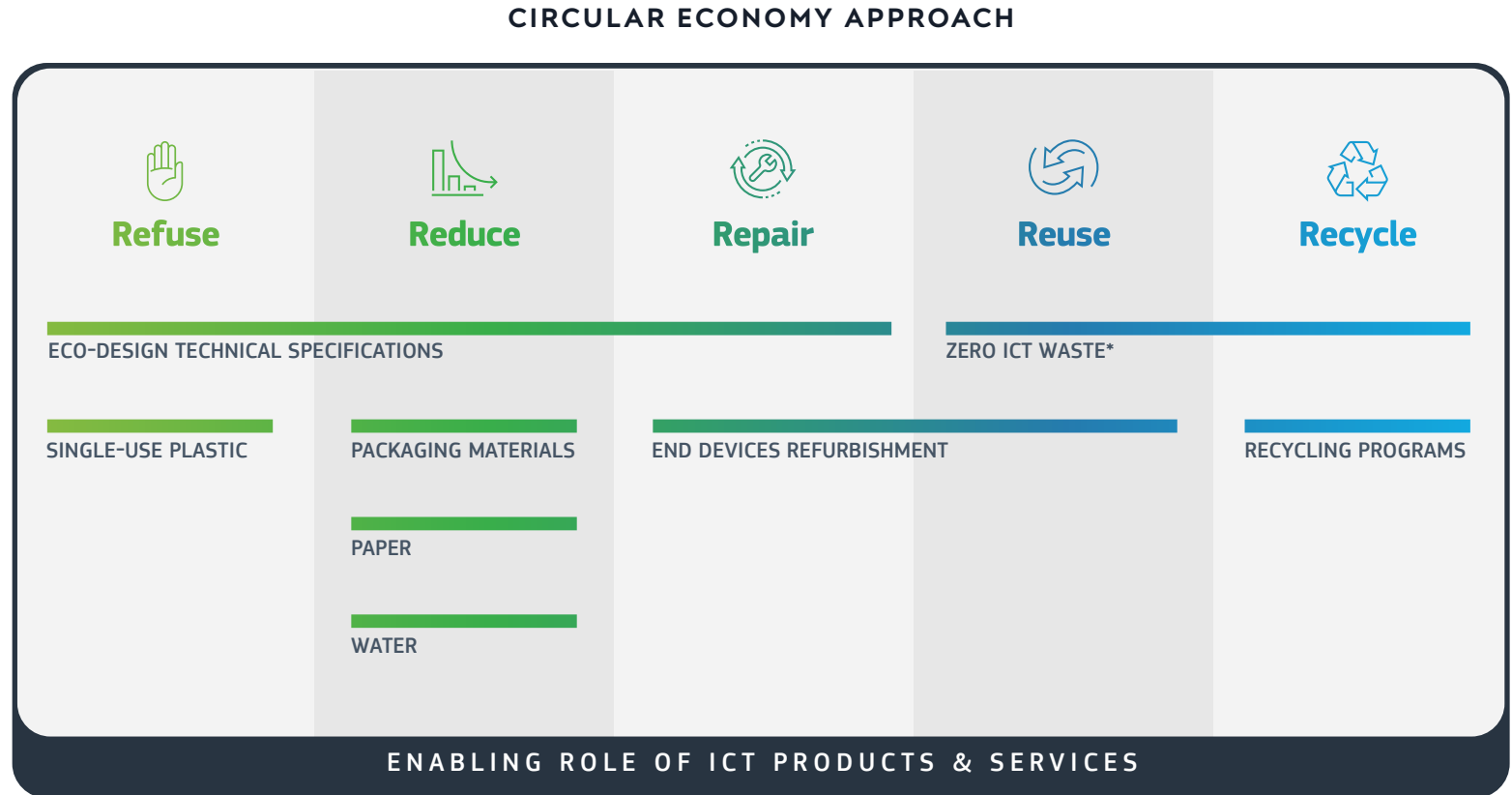
*It is noted that the EU Taxonomy Regulation does not include an activity related to telecom network operation and therefore OTE Group core business activity cannot be presented as a taxonomy eligible activity. Services described above, as well as data center services, have been reported in the **NFR part** of the OTE Group Annual Financial Report 2021.*

# 1.3 Circular Economy

Circular economy is a key element of the transition towards climate neutrality.

As noted in the [EU Circular Economy Action Plan](#), the target of the European Green Deal for climate neutrality by 2050 cannot be achieved without transitioning to a fully circular economy. OTE Group recognizes the scarcity of natural resources and considers a more efficient use of these resources a priority for sustainable development. To achieve this, principles of circular economy (5R: Refuse, Reduce, Repair, Reuse, Recycle) are integrated in its operations across its value chain.

Aiming at the efficient use of materials and natural resources that are necessary for the provision of ICT services, procurement processes incorporate sustainability criteria to the suppliers of OTE Group (see section [Responsible Purchasing and Supply Chain Management](#)) and eco-design technical specifications for the products provided are set (see section [Responsible Marketing](#)). Internally, natural resources conservation is addressed through the efficient operation and maintenance of the telecom network (see section [Energy and Climate Change](#)) as well as initiatives like the digitization of internal processes, the refurbishment of end devices that expand the lifetime and overall utilization of the equipment provided to customers, and the development of waste management practices. These initiatives contribute to the increase of materials recovery and the decrease of waste disposed. Digital



technologies are a critical enabler for optimizing resources consumption and management and OTE Group uses technology to develop services that contribute to the dematerialization and

decarbonization of the economy as well as to its sustainable growth (see section [Products and Services for Sustainability](#)). At the same time, services and initiatives developed (such as e-bills

or the take-back scheme for mobile phones) are expected to increase public awareness on issues related to resources efficiency, recycling practices, etc.

\* Sustainable management of waste generated from telecom & retail network, buildings and datacenters

## 1. ENVIRONMENTAL | 1.3 CIRCULAR ECONOMY

**Refuse** single-use plastic

OTE Group takes a stand in favor of the global movement to tackle plastic waste and its impacts by taking drastic measures for the reduction of single-use plastics and for addressing the problem at its source.

The #ZEROPLASTIC initiative, launched in 2019, continued in 2021 with more ambitious goals, even during the pandemic crisis, that comprise the elimination of single-use plastic bottles, cups, cutlery, and food containers.

The project is implemented in 8 buildings (hosting restaurants and coffee shops) and is addressed to about 6,400 employees in total.

By the end of 2021, OTE Group achieved zero use of plastic bottles, plastic cups & straws, plastic food containers & single use cutlery. The above-mentioned items were replaced with paper or biodegradable ones. Overall, the use of more than 800,000 single-use plastic items was avoided. The goal of the elimination of plastic bags in the retail network has already been achieved since 2019 and as a result, the distribution of more than 1.35m pieces of plastic was avoided in 2021.

**Reduce** materials use**Paper**

Paper consumption at OTE Group level amounted to 135 t or 12.3 kg per employee showing a decrease of about 18% compared to 2020. The Digital Transformation project but also the pandemic crisis with the increased teleworking rates have both contributed to the observed reduction.

**TARGETS 2022****RETAIN:**

**ZERO USE**  
of plastic bottles



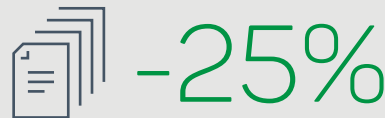
**ZERO USE**  
of plastic cups



**ZERO USE**  
of plastic straws



**ZERO USE**  
of plastic food containers & single use cutlery

**PAPERLESS OFFICE TARGET**

**DECREASE OF PAPER USE IN 2023 WITH RESPECT TO 2020 (GREECE)**

The utilization of IT applications in the context of the broader digital transformation program of OTE Group, resulted, in 2021, in paper savings of 488 t in Greece and 135 t in Romania. For customers who still receive their bills in hard copy, all bills are printed on FSC certified paper (Greece).

**SUSTAINABLE PACKAGING TARGET**

**SUSTAINABLE PACKAGING FOR OWN BRANDED NEWLY LAUNCHED END DEVICES BY H1/2022**

To reduce the environmental impact of printing, on top of initiatives to reduce paper consumption, refilled cartridges (41.5% of total consumption) are used.

**Packaging materials**

Paper, cardboard and plastic are the main packaging materials used, with plastic accounting for about 11% of total consumption that reached 631 t, including all logistic processes.

- The Half Sim initiative started in 2017 and since 2018 all SIM cards put in the market use the half-size holder, resulting in reduced plastic use (about 10 t of plastic avoided in total). The increased adoption of e-sim in the future (currently relevant only for high end devices) is expected to decrease further plastic use.
- In 2021, a new packaging solution has been introduced for the Android TV box that resulted in an additional (compared to the one already achieved in 2020) reduction of paper (1.7 t) and plastic (210 kg) use.
- The use of packaging materials for the refurbished end devices is reduced (compared to those received from suppliers) as plastic is only used for the IR control and the power supply unit.



## 1. ENVIRONMENTAL | 1.3 CIRCULAR ECONOMY

## Water

Telecommunications operations have no specific need for water use and water consumption has not been identified as a material issue for the sustainable development of the Group (see section **Materiality Analysis**). Water consumption concerns employees' hygiene, plant irrigation, HVAC needs and office / stores cleaning. Thus, water sources are not significantly affected by OTE Group activities.

- Water consumption, in 2021, amounted to 162,500 m<sup>3</sup> (about 14.7 m<sup>3</sup> per employee), showing a decrease of 1.6% compared to 2020.
- Measures considered aim at improving monitoring of consumption and data quality to get better insight on how much water is used and where. Currently, the installation or the systematic utilization of hydrometers is examined for buildings with significant AC load in order to address this part of the consumption. In addition, unused water supply points (in the context of space consolidation) are deactivated to avoid any unintended water use or potential leakage issues.
- In renovation of buildings, especially those under the LEED scheme, emphasis is given in introducing appropriate water conservation practices ranging from low-rate water supply to rainwater management, where applicable.

Wastewater generated from OTE Group operations refers to domestic wastewater, which is directed to the available wastewater networks and is then treated according to area-specific processes in the municipal wastewater facilities. In Greece, there

are three cases of main buildings and warehouses where the companies operate own wastewater treatment plants that handle 20,593 m<sup>3</sup> of wastewater, of which about 82% is reused for irrigation purposes. No planned or unplanned water discharges to the environment as well as no significant spills occurred during 2021.

## Repair end devices

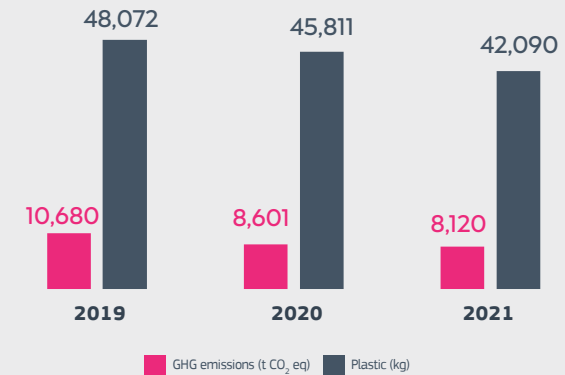
The OTE Group was the first company in Greece to implement refurbishment processes for end devices (ADSL, VDSL, VoIP modems, routers, and TV decoders), and so far, it remains the only company to have adopted this approach. As a result, the OTE Group is facilitating the prolongation of lifetime and overall utilization of the equipment supplied to its customers. Proper end-of-life management of end devices that cannot be refurbished is also being implemented.

In 2021, about 261,500 end devices were refurbished, while about 195,000 devices were recycled. Avoided GHG emissions are estimated at 8.1 kt CO<sub>2</sub> eq, while avoided plastic use is about 42 t.

## Reuse and Recycle (Waste Management)

Solid waste generated by the OTE Group activities derive from the development, maintenance and operation of the telecom networks and equipment, from offices and stores operation as well as from the management of the corporate vehicle fleet. In addition, products sold / leased at the end of their lifetime represent another, indirect, source of solid waste (downstream).

## END DEVICES REFURBISHMENT ENVIRONMENTAL IMPACT (GREECE)



## SUSTAINABLE WASTE MANAGEMENT TARGETS

ZERO ~400,000

ICT WASTE\* TO LANDFILL

MOBILE DEVICES\*\* TAKE-BACK BY THE END OF 2024

\* ICT Waste is waste generated from telecom & retail network, buildings and datacenters

\*\* Mobile devices: Smartphones, Simple Phones, Fixed Phones (wired and cordless), Notebooks/Laptops, Tablets, Chargers/Powerbanks, Wearables & Accessories

1. ENVIRONMENTAL | 1.3 CIRCULAR ECONOMY

Aiming at the effective management of waste generated, an extensive network of collection, monitoring, storage and management/recycling, which covers all activities nationwide, has been developed. In this context, the Group companies work with certified / authorized companies to ensure (a) the proper management of waste generated (including cross-border transportation) and (b) the recovery of the materials contained (e.g., copper, iron and steel, etc.) and the conservation of natural resources. Information on the methods applied, is provided by the above-mentioned companies.

A take-back scheme is implemented in the Group retail network (for phones and accessories, tablets, home batteries and ink cartridges) to facilitate the recycling of mobile devices sold / leased at the end of their useful lifetime. **In 2021, about 16.5 t of mobile devices were collected and forwarded for recycling.**

An internal recycling program in buildings is in place (Greece). The program is based on the principle of "sorting-at-source" with centralized waste collection and management. Streams covered are paper, packaging materials, ink cartridges, phones, other small electric and electronic appliances, and batteries. **In 2021, the program covers 25 buildings nationwide, serving approximately 9,000 employees. Recycled quantities include 82 t of paper and 12 t of packaging materials.**

More information on the quantities of waste generated/recycled is provided in the section [Environmental Performance Data-Waste](#).

**WASTE MANAGEMENT 2021**

**3,619t**

WASTE GENERATED  
(GR: 85%, RO: 15%)



**78%**

RECYCLED  
OR REUSED

**OTE GROUP**

**926**

HAZARDOUS

**1,402**

TECHNICAL

**180**

PAPER

**1,105**

RESIDUAL

**5**

OTHER



**GREECE**

**926**

HAZARDOUS

**1,284**

TECHNICAL

**167**

PAPER

**701**

RESIDUAL

**5**

OTHER



**87.5%**

RECYCLED OR REUSED  
IN GREECE

**HAZARDOUS**

Waste that according to legislation require specific treatment (e.g. stationary engine batteries, lubricants, telephone poles impregnated with creosote oil).

**TECHNICAL**

Materials and equipment used for the provision of telecom services (e.g. cables, metals, etc.) and products that make use of the telecom services provided (e.g. phones and related accessories, portable batteries, etc.).

**RESIDUAL**

Typical municipal solid waste from buildings, packaging materials and waste related to office operation (e.g. ink cartridges).

**OTHER**

Waste streams not included in the above-mentioned categories (e.g. end of life vehicles).

**DISPOSAL**

concerns Municipal Solid Waste from offices as well as waste from Warehouses that cannot be managed otherwise.

*WEEE are classified according to the established procedures for collection/ transportation.*

## 1. ENVIRONMENTAL | 1.3 CIRCULAR ECONOMY

## SMART CITIES: CREATING THE CITIES OF TOMORROW

Global temperature is increasing, climate is changing, and urgent global action is needed. OTE Group has in place a climate change strategy with ambitious targets that addresses mitigation activities across its value chain. OTE Group is committed in developing products and services that enable climate change mitigation and adaptation, generating benefits for the society, the environment, and its development.

According to the European Commission “A smart city goes beyond the use of digital technologies for better resource use and less emissions. It means smarter urban transport networks, upgraded water supply and waste disposal facilities and more efficient ways to light and heat buildings. It also means a more interactive and responsive city administration, safer public spaces and meeting the needs of an ageing population.” OTE Group supports the transition of current urban infrastructures into new, Smart City structures. Via innovative technologies Internet of Things (IoT), it proposes a wide range of **applications and solutions** related to cities operation (from car parking and street lighting to energy, waste and water management, and air quality monitoring). Through these technologies, real-time, transparent information becomes available to the users to assist them in taking better decisions, contributing to a better quality of life.

COSMOTE implemented smart cities solutions in the municipalities of Monemvasia and Chania, utilizing the Narrow-Band Internet of Things (NB-IoT) technology. Smart Water Management in Monemvasia and Smart Parking in Chania make citizens’ daily lives easier, enabling the municipalities to save valuable resources and reduce spending. The implementation was based on NB-IoT technology, requiring a small amount of data to interconnect devices over the mobile network, drastically reducing energy consumption and cost.



### IN MONEMVASIA, SMART METERS WERE INSTALLED ON THE MUNICIPALITY’S WATER SUPPLY NETWORK FOR REMOTE MONITORING AND MANAGEMENT OF WATER SUPPLY AND CONSUMPTION, IN REAL TIME AND WITH PRECISION.

The Smart Water Management solution, which was based on the “ARTEMIS-water” solution, achieves savings of water resources, stabilization of water pressure, quality control and leak detection, while significantly reducing energy consumption and municipal spending. **Sixteen (16) water supply connections** with potential abnormal water consumption, **55** with almost zero consumption and **33** with increased consumption especially during summer were detected, and corrective actions were designed.

### A SMART PARKING SOLUTION WAS IMPLEMENTED IN CHANIA FOR PEOPLE WITH DISABILITIES.

The project involved the installation of special sensors in existing municipal parking spots for local and visiting persons with disabilities. Using a special mobile app, drivers can instantly find available parking spaces and how to get to them, while with special portable cards at their disposal, they automatically validate their eligibility to use the parking space. This project, which is already being used by more than **300 eligible drivers**, encourages equal participation for everyone – locals, visitors and tourists – in the life of the city, while also facilitating the work of the traffic police.

#### Key Targets

**11.6** By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management

## 1.4 Electromagnetic Fields

### WHY IT MATTERS

Potential health effects of man-made electromagnetic fields (EMF) have received particular attention during the last 50 years and have been researched extensively. In this context, international scientific organizations have issued guidelines regarding exposure to EMF, including 5G technology, and a relevant legislative framework has been developed. OTE Group pays particular attention to complying with national and international safety guidelines and providing products and services that not only meet the increasing needs of their customers but are also safe and manufactured in accordance with international conventions and standards.

OTE Group has adopted and implements an **EMF policy** in which it is committed to:

- Applying the precautionary principle for the whole range of the products and services provided
- Contributing to public protection through actions aiming to increase transparency, awareness, participation and scientific knowledge.

### Activities in Greece

COSMOTE supports the “Pedion24” program of continuous electromagnetic fields measurements, the results of which are readily accessible to the public at the program’s website. In 2021, 246 measurement stations were in operation (due to COVID-19 limitations, the installation of only one additional measurement station was implemented in 2021), while about 72m measurements have been conducted since the beginning of the program. The installation of two more stations is in progress and is expected to be

completed as soon as the associated base stations become operational. In addition, COSMOTE operates the COSMOTE Environmental Electromagnetic Fields Measurement Laboratory (accredited according to EN ISO / IEC 17025). Since 2018, the scope of the laboratory accreditation expanded to cover measurements regarding 5G services.

In 2021, in addition to the measurements made in the context of the “Pedion24” program and by the COSMOTE laboratory (10 measurements), 13 more measurements were conducted by independent institutions (Universities, Greek Atomic Energy Commission) at COSMOTE’s request. Public exposure safety limits were not found to be exceeded in points of free public access, while the measurements made by the Greek Atomic Energy Commission (to a sample of at least 20% of the base stations operating in urban areas each year) led to the same result except for one case where the micro base station was removed because of non-compliance with

Greek EMF limits due to ex-post structural changes in an adjacent building.

To improve outreach, an e-mail address for questions regarding electromagnetic fields information is available ([emfinfo@cosmote.gr](mailto:emfinfo@cosmote.gr)).

### Activities in Romania

In 2021, there were 13 EMF measurements performed by ANCOM (National Authority for Management and Regulation in Communications) on Telekom Romania Mobile sites at the request of external stakeholders. Public exposure safety limits, as set by the Order of the Minister of Public Health no. 1193/2006, were not found to be exceeded in points of free public access.

Through fixed monitoring sensors installed in urban centers, ANCOM makes measurement results available to the public in real time. In addition, ANCOM performs measurements with mobile equipment which are also publicly available.

More about EMF Continuous monitoring in Romania can be found [here](#).



### APPLYING THE PRECAUTIONARY PRINCIPLE

The levels of electromagnetic fields, in all Base Stations, comply with the suggested limits of the **World Health Organisation** and the **International Commission on Non-Ionizing Radiation Protection (ICNIRP)**, as well as with the latest national limits which are only 60–70% of the ICNIRP limits, in all points with free public access.

For every wireless telecommunication station and mobile Base Station, a radio emission study and an electromagnetic background study (in some cases) is conducted, for an area of up to a radius of 50 meters and 300 meters respectively to ensure that all stations operate within legal limits.

All products placed in the retail network bear all necessary labels foreseen by national and EU legislation while all mobile phones sold operate within appropriate electromagnetic field safety limits (see section **Communication with Customers**).

# 1.5 Other Environmental Aspects

## Ozone

OTE Group companies implement all appropriate procedures for the management of ozone-depleting substances used as refrigerants and in line with regulations and national legislation in force. These procedures include replacement of legacy equipment or replacement of the refrigerant in legacy equipment. Fire suppression systems already use suppressants with zero ozone depleting potential (ODP). The quantity of hydrofluorocarbons (HFC) replenished for 2021 is equivalent to GHG emissions of about 9 kt CO<sub>2</sub> eq (down by 11% compared to 2020).

These emissions account for about 35% of scope 1 GHG emissions. With a view to repair any potential leakages, monitoring and maintenance programs are in place.

## Biodiversity

OTE Group is aware of the high value of biodiversity in the countries it operates and recognizes the close relationship between biodiversity, sustainable development and human well-being. At the same time, the provision of high-quality services everywhere and at any time necessitates the operation of a geographically

extensive network of telecommunication installations (base stations and wireless communication stations) including, inevitably, in NATURA 2000 sites, RAMSAR and other protected areas.

In Greece, in 2021 there were 533 COSMOTE base stations and 425 OTE base stations installed in 198 and 142 Natura sites, covering areas of 25.7 and 23.2 hectares, respectively. In Romania there were 33 installations (32 base stations and 1 building) in Natura sites, covering an area of 1.73 hectares (2021). More information on the protected areas (e.g. location, maps, area, protected species, etc.) is available on

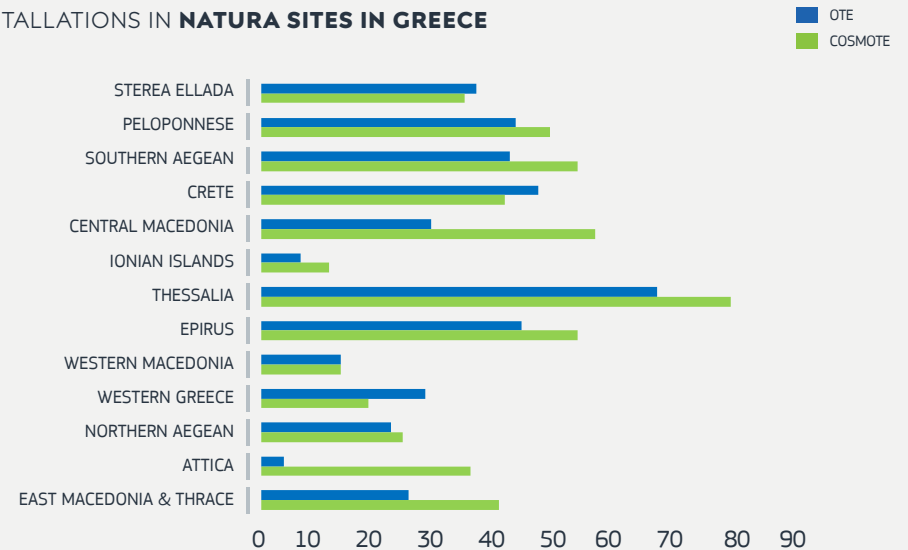
the relevant website of the [European Commission](#) (NATURA 2000 sites) and the [RAMSAR convention](#).

All installations operating in NATURA sites are fully licensed by regulatory authorities in Greece ([Hellenic Telecommunications and Posts Committee](#)) and Romania ([National Authority for Management and Regulation in Communications](#)). All buildings / installations / telecom lines that are currently in use and / or installed by OTE Group are also registered and relevant information is available.

### QUANTITIES OF REFRIGERANTS REPLENISHED (KG)

	2019	2020	2021
<b>R407C (kg)</b>	3,545.85	3,776.80	3,768.50
<b>R410A (kg)</b>	603.00	818.40	736.50
<b>R134a (kg)</b>	400.00	280.00	144.00
<b>R417A (kg)</b>	1,310.00	921.70	627.50
<b>R422D (kg)</b>	71.00	40.50	-

### INSTALLATIONS IN NATURA SITES IN GREECE





## 1. ENVIRONMENTAL | 1.5 OTHER ENVIRONMENTAL ASPECTS

LIFE SAFE-CROSSING aims to implement actions geared to reducing the impact of roads on a number of priority species (brown bear, wolf, lynx) in four European countries (Italy, Spain, Romania, and Greece).

Innovative technologies and best practices are used to prevent collisions ("Animal-Vehicle Collisions" prevention system, virtual fence), increase driver attention (e.g., neuroscience applications) and facilitate the movements of animals and hence contribute to protecting biodiversity. It is estimated that the LIFE SAFE-CROSSING solutions will achieve a 30% reduction in vehicle speeds and a 50% reduction in fatalities for the protected animals in the four countries.

OTE Group R&D has developed a holistic solution for monitoring and automatic processing of a large volume of wildlife photos/videos collected from 45 underpasses along 55 kilometers of the Egnatia Motorway. The solution includes low-consumption wireless (4G) cameras (powered by solar panels), cloud infrastructure for data storage (photos, videos, statistics), and tools for automated:

- Species recognition and categorization using Artificial Intelligence techniques.
- Creation of animal-crossing statistics.
- Data visualization including underpass information, photos, videos, and statistics.

The solution exhibits great advantages such as low cost, ease of installation, drastic reduction of labor-intensive and time-consuming procedures, and significant reduction of on-site visits to monitoring locations. It therefore results in major environmental benefits and cost savings.



DURING 2021,

 72,000

VIDEOS AND PHOTOGRAPHS WERE RECORDED, PROCESSED, AND STATISTICALLY ANALYZED IN AN AUTOMATED WAY.

The analysis significantly facilitated understanding the living conditions and preferences of the region's fauna, so that the impact of human intervention (road infrastructure) could be mitigated through actions for the protection of animals and the environment (reforestation, fence expansion, signposting, etc.).

The results of the statistical analysis have already led to designing suitable interventions (creating / planting vegetation to

attract animals, improving fencing, pruning, removal of debris, creation of dry corridors, etc.) at specific passage points, with priority given to those preferred by brown bear populations.

Thirteen partners drawn from NGOs, private companies, and public bodies in four countries (Italy, Greece, Spain, and Romania) are participating in the LIFE SAFE-CROSSING project that will be running until August 2023.





# Society

**CUSTOMERS**

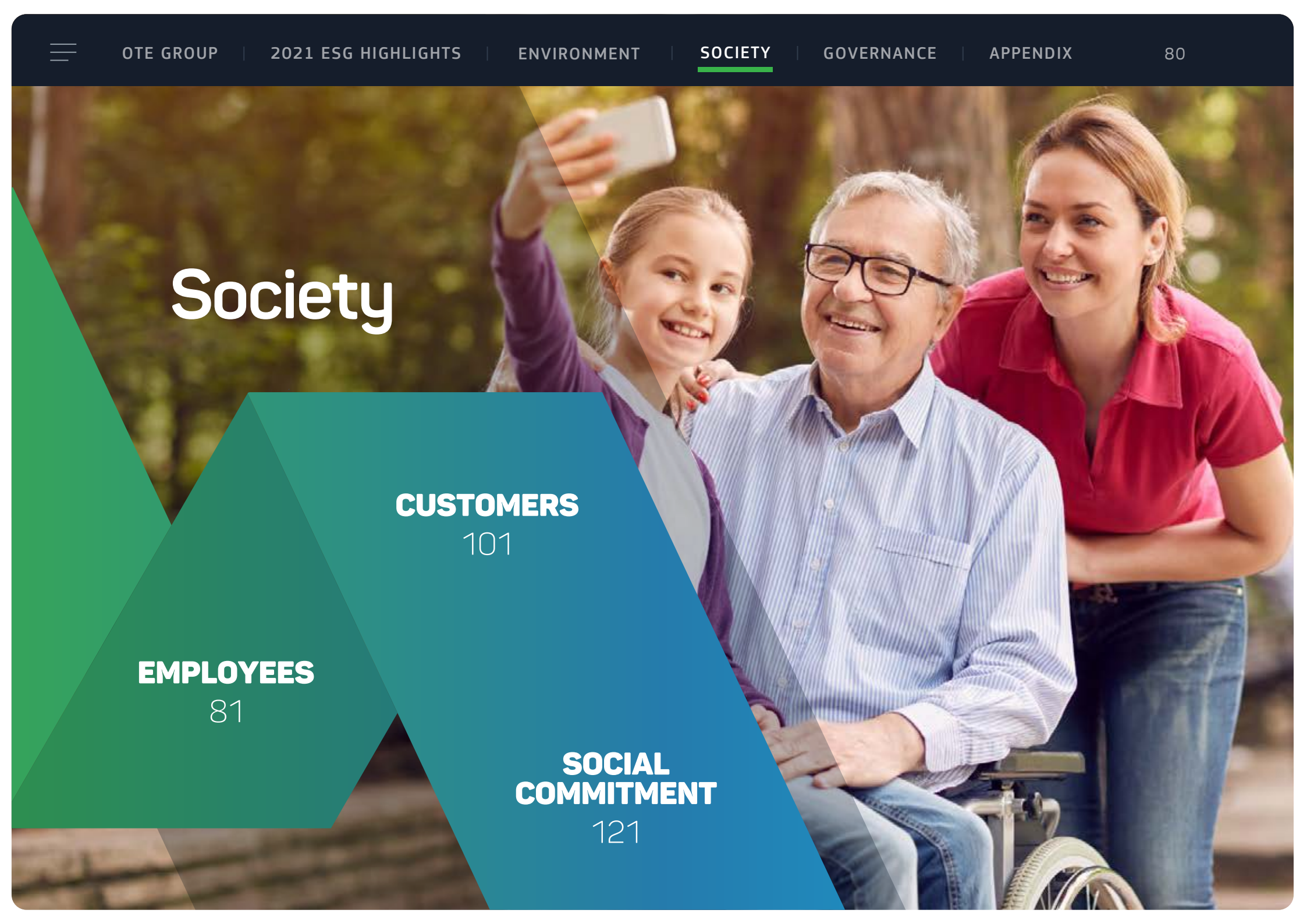
101

**EMPLOYEES**

81

**SOCIAL  
COMMITMENT**

121





SOCIETY  
**Employees**

**11,038**

EMPLOYEES AT OTE GROUP

**4**

EMPLOYEE SURVEYS  
IN 2021

**19,459**

PARTICIPATIONS IN  
EDUCATIONAL PROGRAMS

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## 2.1.1 Human Resources Management



OTE GROUP PROVIDES A SUSTAINABLE, EFFICIENT, AND TECHNOLOGICALLY ADVANCED WORKING ENVIRONMENT FOR ITS PEOPLE.

OTE Group fosters a culture of growth, recognizes high performance, and offers equal and unlimited opportunities for development.

It also cultivates an attitude of growth mindset and lifelong learning, while utilizing the potential of technology in education. In this context, OTE Group invests in digital tools to enhance skills and digital literacy for its employees, encourages collaboration, open communication and innovation, and evaluates new working models (remote, agile, etc), while putting customer experience excellence, in the center of its actions. For OTE Group, the vision for an equal society for all and the values of Diversity, Equity, and Inclusion, shape the Group's Human Resources policies and actions, contributing to the company's vision to create *a better world for all*.

In 2021, OTE Group established its own **Diversity, Equity and Inclusion Policy**, which ensures the holistic and integrated management of the concept of diversity and aligns with the Group's business objectives and strategy. It also encourages cross - functional collaboration and interaction between groups, addressing customer needs and achieving an excellent customer experience. With this Policy, OTE Group has committed that the percentage of women in senior management positions will reach 30% within the next three years.

## 2.1 EMPLOYEES | 2.1.1 HUMAN RESOURCES MANAGEMENT

For OTE Group, first and foremost priority is to protect its employees, partners, their families, and its customers, especially when disruption of any kind emerges, such as the COVID-19 pandemic and the adaptation to the new normal, while ensuring business continuity and compliance with the safety measures in place. In the midst of the financial and social difficulties that arose during the second year of the COVID-19 pandemic, and with a high sense of responsibility towards society and its people, OTE Group proceeded, in 2021, to the implementation of a coordinated plan, for this new reality, while implementing the state guidelines. At the same time, despite the adverse conditions created by the pandemic, the OTE Group's goal remains the uninterrupted operation of the telecommunications network and the continuous and seamless customer service.

In this era of constant changes and disruptions, where digitization is already an industry standard in the workplace, the role of Human Resources (HR) in OTE Group, remains fully aligned with the company's strategic objectives.

In 2021, HR digital tools and systems were upgraded to support the new Collective Labor Agreements signed in the Spin-Off entities, to incorporate new OTE Group subsidiaries, as well as, to support effectively the demands created by the continuing COVID-19 pandemic, enabling large scale teleworking practices and assisting the implementation and monitoring of the necessary health and safety measures. The use of e-signature platform was extended to employment contracts, creating a totally paperless experience for the employees. Furthermore,



robotic process automation (RPA) was applied to new HR processes, which enabled the performance of high-volume repetitive tasks, with the minimum risk.

Also, in 2021, the People Analytics platform was firstly introduced, a tool that brought HR reporting capabilities to a new level, offering a valuable insight to HR data and supporting HR and line management decision making.

Although, during the previous years, OTE Group set the basis for virtual collaboration and communication between cross functional teams, all digital channels and digital platforms for communication, collaboration, work management and training (digital learnings) were upgraded and made available for all employees, when working from home.

Furthermore, a series of job rotation programs were implemented in 2021, encouraging OTE



Group employees who have showcased great growth potential, to engage in new roles, participate in new projects and gain valuable experience for the new digital era. Through job rotation, employees are able to carve their own professional paths, come in contact with different groups of people and become exposed to work environments, practices, tools and tasks, develop new skills and eventually, grow both personally and professionally. A total of 302 job rotation moves took place in 2021.

### Operational Framework

Within OTE Group's Policy on Employee Relations, principles, such as respect for human rights, fair labor, abatement of discrimination, equal treatment for men and women, and combating child or forced labor are of great importance.

The scope of responsibilities and duties framework of the Group's Chief Human Resources Officer Business Unit comprises:

- **HR Competency Centers:**
  - Compensation and Benefits, HR Controlling, Organizational Effectiveness
  - HRD: Talent and Performance Management, Learning and Skills Development, Recruitment, Change Management and HR Communication
  - HRM and Shared Services: HR Digitization, Labor Issues, Employee's Contact Management
- **HR Business Partners:** contact point between human resources unit and all other business units

OTE Group Chief Human Resources Officer is a member of the Group's Management Team.

## 2.1 EMPLOYEES | 2.1.1 HUMAN RESOURCES MANAGEMENT

**Organizational Transformation and Effectiveness**

In a modern, highly competitive, and rapidly changing business environment, OTE Group strives to adjust to the increasing external demands by taking steps to restructure, upsize and downsize its organization. This is the only way to guarantee healthy and sustainable business practices that best serve the needs of the customers. This translates in meaningful changes of our business activities, operating model, organizational structure, and ways of working.

In January 2021 the spin-off of three OTE and three COSMOTE business sectors (Call Centers, Shops and Field Technicians), to existing as autonomous OTE Group subsidiaries (100%), has been successfully completed, aiming at empowered and more flexible customer phasing units.

By the end of 2021, Collective Labour Agreements have been signed amongst three spin-off entities, for the second time historically since the beginning of OTE's transformation journey in 2011, ensuring the change from outdated salary systems and old-fashioned policies to modern and flexible compensation and institutional frameworks that will attract and retain new talent. New employment and remuneration policies, new variable pay schemes

and cafeteria benefits were introduced, the full implementation of which will take place in 2022 in the respective entities.

In the framework of the optimization of OTE Group assets' portfolio, optimization of capital deployment and the enhancement of the value of the Group, the sale of Telekom Romania (TKR), OTE Group subsidiary in Romania has been completed in October 2021. The examination of strategic alternatives, relative to the future of various OTE Group subsidiaries will continue in the following years.

Furthermore, within 2021, COSMOTE Payments, a modern electronic money institution, has been set in action, looking forward to facilitating customers' major digital payment needs.

On top of these changes, the agile organization concept has been introduced in the Marketing organization, setting the pace for further radical changes in our structure and working practices.

Finally, a new project fostering optimal leadership, organizational and cultural change and a cost-effective structure has been initiated. All managerial positions were classified within three categories based on the nature of their activities and connected to a specific management span ratio. The project was concluded within October 2021 and results will be regularly updated, towards the improvement of respective KPIs and targeting at a lean and flexible organization across the Group.

**Job Family Model (JFM) expansion**

Job Family Model (JFM) is in full use in OTE, COSMOTE, GERMANOS and CTS. Within 2021 the Model has also been introduced to other

subsidiaries such as COSMOTE e-Value. Top and middle management executives were informed of the concepts and functionalities of the JFM. The majority of employees' allocation to roles has been completed. Next step includes alignment across OTE Group and one-to-one communication roll-out to all COSMOTE e-Value employees.

JFM has also provided the basis for the development of OTE Career Coach. This platform for skillset and career paths is gradually enriched with additional roles and updated skills. First sprint of 150 roles has been successfully completed within 2021. Career Coach is expected to launch within 2022.

OTE GROUP ADJUSTS TO THE RAPIDLY CHANGING BUSINESS ENVIRONMENT BY IMPLEMENTING MEANINGFUL CHANGES OF ITS BUSINESS ACTIVITIES, OPERATING MODEL, ORGANIZATIONAL STRUCTURE AND WAYS OF WORKING.



## RESILIENCE AND RESPONSE TO COVID-19

During the second year of the COVID-19 pandemic, OTE Group maintained strong reflexes, taking advantage of the mechanisms it had developed and implemented since the beginning of the health crisis, in order to safeguard the health, the safety and the well-being of its people.

Through various actions, the company maintained the appropriate working conditions and safeguarded the well-being of its people. Indicatively:

- Health & Safety department developed specialized programs, so as to provide updated and valid information, support, prevention and protection to all employees. For their most part, these programs were conducted digitally. The benefits were multiple, since all employees nationwide, as well as their family members, could participate.
- The company also provided improved digital learning programs, through digital learning platforms, offering unlimited and flexible participation to all OTE Group employees.
- Finally, upgraded mobile packages were provided to all employees, with zero charges to all destinations.



The "COVID-19 OTE Group Crisis Management Team", which was created at the beginning of the pandemic, for the optimal coordination of all necessary actions during the health crisis, continued to operate in 2021. Furthermore, the company implemented an internal "COVID-19 Case Management Process", so as to address all suspicious or positive COVID-19, which occurred within OTE Group. The aforementioned process is adapted

according to the circumstances, taking into account the continuous changes in the epidemiological data (disease levels, vaccinations, mutations of the virus etc.).

The dedicated Health & Safety hotline, which operated since the beginning of the pandemic in March 2020, received, throughout 2021, more than 30,000 calls from employees, nationwide.

Finally, OTE Group puts special emphasis on continuous communication to all employees

(through direct emails, posters, articles on the company's intranet), with updated info for COVID-19.

The specialized Health and Safety Team and the medical staff of the Group are in direct contact with the National Organization of Public Health (EODY) and apply all the necessary measures for the protection and safety of the Group's employees. Whenever a suspicious or positive COVID-19 case is identified in the Group, all prescribed procedures are followed, in direct

contact with EODY and the General Secretariat for Civil Protection.

Throughout the pandemic, OTE Group puts special emphasis on continuous communication to all employees (through direct emails, posters, articles on the company's intranet), on a daily basis, of any outcome related to the protection and safeguarding of their health and carries on all necessary actions with consistency, sensitivity, and responsibility.

## 2.1.2 Employment

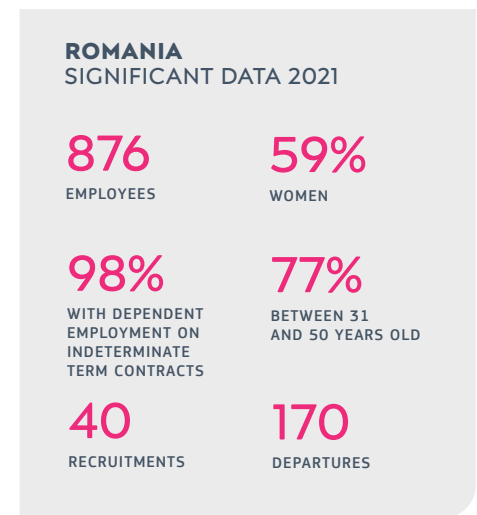
On December 31st, 2021, OTE Group employees numbered 11,038\*.

99% of OTE Group employees were employed on indeterminate term contracts.

Women constitute 40% of the Group's employees. CTS and Telekom Romania Mobile Communications employ a large number of technical personnel, the vast majority of whom are men.

Having always as a priority to improve its employee experience, OTE Group remodels and enhances the operation of the OTE Group Employees Service Center, "MyHR", which was launched in 2015. "MyHR" manages queries on issues and processes regarding human resources, while its services are regularly updated and enhanced to provide prompt and quality service to all employees.

In 2021, voluntary exit programs with financial incentives were enacted in a number of OTE Group companies in Greece, aiming at further rationalization of human resources and the respective labor cost. In total 127 employees in Greece, applied for the scheme and accepted the incentives offered, which were designed in a socially responsible manner. Overall, 63 employees left the Group within the first three quarters of 2021 and the rest are expected to depart by 01.04.2022, with the majority of the remaining voluntary departures taking place on 01.01.2022.



\* OTE Group HR activities and data presented in this Chapter refer to OTE, COSMOTE, GERMANOS, OTE Globe, OTE Academy, COSMOTE e-value, CTS, and Telekom Romania Mobile Communications employees unless otherwise specified.

## 2.1.3 Fair Employment Policy Framework and Equal Opportunities

### WHY IT MATTERS

OTE Group is vigilant with ensuring that it fosters a working environment that offers fair and equal opportunities to all, independent of gender, age, race and/or religion, sexual orientation etc. OTE Group has established due diligence processes that prevent, identify and eliminate discrimination and harassment against any employee.

The OTE Group Fair Employment Policy is based on the respect of human rights, in accordance with the following:

- The national regulatory frameworks in countries of operation and the EU
- The United Nations Global Compact
- The [OTE Group Code of Conduct](#).
- The [OTE Group Policy on Employee Relations](#).
- The [OTE Group Code of Human Rights and Social Principles](#).
- The [OTE Group Diversity, Equity and Inclusion Policy](#).

OTE Group delivering on the commitment of creating a corporate culture that will embrace and promote the values of Diversity, Equality and Inclusion, adopted in 2021 the Diversity, Equity & Inclusion Policy for all group employees. The D, E & I Policy provides a framework of more specific guidelines that supplement the provisions of the Code of Conduct, the Guiding Principles, and the

Code of Human Rights and Social Principles and is aligned with the Group's business objectives and strategy.

### Companies' induction programs for new employees include a separate section on Compliance issues, on the Code of Conduct, Sustainable Development, as well as on internal policies, Freedom of Association and Collective Labor Agreements

In March 2018, two new two-year Collective Labor Agreements of OTE and COSMOTE employees, were signed with similar terms, valid from 1 January 2018 until 31 July 2021. In 2021, two Collective Labor Agreements of OTE and COSMOTE that prolonged the validity of the previous one until 31-12-2022 were signed. For any significant change in their operation (e.g. reorganization, outsourcing operation, business interruption, expansions, 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.

Similarly, in October 2021 the Collective Labor Agreements of CTS and GERMANOS employees and in November 2021 of COSMOTE e-Value employees were signed, valid until 31-12-2022.

Similarly, a two-year Collective Labor Agreement of Telekom Romania Mobile Communications

employees was signed in February 2020, valid until 1 March 2022.

All signed Agreements regulate payroll issues, leaves, benefits, compensation, employees working hours and health and safety issues.

Moreover, in CTS, GERMANOS and COSMOTE e-VALUE transition terms were included in order to assure the smooth transition in new companies of ex OTE & COSMOTE employees.

In 2021, three strikes took place, regarding general claims of Greek employees due to the financial situation of the country, lasting 3 days in total.

96% of OTE Group employees, are covered by Collective Labor Agreements.

### Combating Discrimination, Equal Opportunities and Diversity

The culture of inclusion and the absence of discrimination are the fundamental principles for the operation of the company, as defined by the Group's Code of Conduct and Code of Human Rights and Social Principles. Reinforcing its position as an inclusive and equal employer, the Group, in 2019, became a founding member of the Diversity Charter in Greece; an initiative of the European Commission, which aims to act as a means of commitment towards equal opportunities and diversity in every working environment in Europe. It has been supported by Heads of State, Institutions, State Bodies, Ministries and Business Associations.

# 96%

OF OTE GROUP EMPLOYEES  
ARE COVERED BY  
COLLECTIVE LABOR AGREEMENTS



Moreover, in 2021 OTE Group has established its own Diversity, Equity and Inclusion Policy, which ensures the holistic and integrated management of the concept of diversity and aligns with the Group's business objectives and strategy. The Training Catalogue for 2022 includes a new chapter with Diversity, Equity and Inclusion, available to all employees.



More information can be found on the [company's website](#).

## 2.1 EMPLOYEES | 2.1.3 FAIR EMPLOYMENT POLICY FRAMEWORK AND EQUAL OPPORTUNITIES

**Non-discriminatory Compensation**

There is no gender discrimination in compensation policies. As such OTE Group, has determined the remuneration ratio between its male and female employees, at different management levels, taking into consideration their base salaries.

Employees' salary is determined by the level of the position they hold, their level of education or Role and years of employment. According to new CLAs in CTS, Cosmote e-Value and GERMANOS the salary is determined by the Role of the employee and the years of employment. The minimum (basic) salary is adjusted according to the salary category the employee belongs to.

Indicatively, the minimum (basic) salary for secondary education graduates is set by the applicable collective labor agreements, at €866,12 (31/12/2021), 33% higher than the national minimum wage in Greece (€650).

The pay gap between men and women based on the analysis at the same levels of positions is very small. Overall, taking into consideration the employees of four of the largest companies of OTE Group in Greece (OTE, COSMOTE, GERMANOS and CTS), the pay gap between men and women is 3%.

At different management levels as described above, the ratio varies between 2% to 7%, namely:

- Top management: 2% (CEO, Chief officers, Executive Directors)

- Middle management: 7% (divisional heads of the Company, i.e. Directors)
- All other positions: 0%

The additional severance payment, after the conclusion of the latest Collective Labor Agreement (CLA), is granted to OTE employees under the same terms and conditions (based on the years of service and the hiring date) without discrimination based on gender.

**Parental Leave for Childcare and Family Protection**

The Group provides parental leave for childcare, which is above the minimum leave set by law. More specifically, OTE offers an additional 5 months of paid leave, while COSMOTE, CTS and GERMANOS offer an additional 3 months of paid leave. Parental leave is provided to working mothers or fathers, immediately after the end of maternity leave.

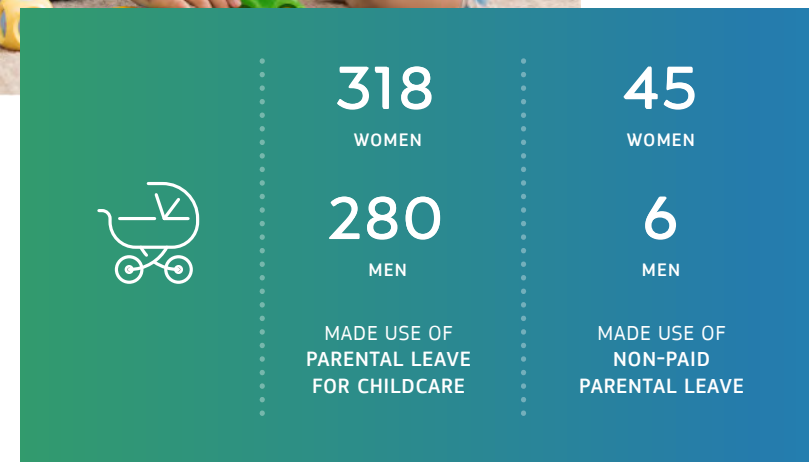
Moreover, OTE, COSMOTE, CTS and GERMANOS employees, who have children with a disability of 67% or more, receive additional days from those provided by the law (a total of 12 days), for the monitoring of the performance of children. The days are granted to both mothers and fathers.

**Additional Days of Sick Leave in Case of Serious Diseases**

In the latest Collective Labor Agreement of OTE and COSMOTE, it is stated that in case of serious diseases, the employees are entitled to 60 working days (instead of 30 days) of paid sick leave.



*The Group provides parental leave for childcare, which is above the minimum leave set by law.*





## 2.1.4 Health and Safety

### WHY IT MATTERS

Health and Safety is an important pillar of OTE Group's operations and strives to safeguard the occupational safety and health of all employees, as well as the safety of customers, contractors, and suppliers.

In 2021, the difficulties and the restrictions faced due to the COVID-19 pandemic were taken into account and OTE Group created a roadmap of Health and Safety initiatives, which focused on the following categories: promotion of health, mental wellbeing, balance and counselling. Most of these initiatives were conducted digitally, which offered to all employees nationwide and also to the members of their families, the opportunity to participate in them, achieving for one more year high performance results towards a healthier lifestyle and a balanced culture in daily life.

This year, OTE Group continued providing guidelines for the prevention and protection against the pandemic. The implementation of a carefully well-organized action plan, targeted in the new daily way of life, supported employees to return to normalcy, by adopting all measures, according to the current health and safety protocols issued by the relevant authorities.

In addition, OTE Group holds appropriate systems, policies and procedures that identify and prevent

workplace injuries and occupational diseases.

Last, but not least, OTE Group gives special emphasis on mental health issues of its people. Towards this end, it enhanced the existing psychological support and enriched the 24-hour hotline, so as to provide support for COVID-19 pandemic, as well as for daily issues.

### Health and Safety Policy

OTE Group's Health and Safety Policy aims at assuring that all operational units implement procedures related to the promotion of Health and Safety in the workplace. The main priority of OTE Group is the compliance with all requirements of the relevant legislation, the international standard ISO 45001:2018, and their implementation in all premises and activities nationwide (salespersons in our stores, field technicians, climbers, employees in warehouses, offices, Call Centers, e.tc.).

Prevention of the accidents in workplace, assessment of occupational risk, prompt response to emergency cases and continuous trainings for the employees are fundamental for the preparedness of Health & Safety in our Company. The technical and medical inspections, with every-day frequency, contribute to this direction.

The identification of risks arising in workplace, are reported in Occupational Risk Assessment by Safety Engineers and Occupational Physicians. The Occupational Risk Assessment file is included in a systematic process. This process aims at identifying the sources of risk and determining

how these risks can be eliminated or avoided, listing preventive measures already implemented or the additional measures which must be taken to protect employees. Risk Assessments include Risk Analysis, Risk Evaluation based on impact, frequency, probability and residual risk.

Throughout OTE Group, depending on the nature of work and the related risks arising from it, appropriate Personal Protection Measures (PPM) are applied, where this is necessary. Personal Protective Equipment (PPE) includes equipment, systems or tools, which are delivered to employees, in order to protect them during the performance of their duties. Furthermore, OTE Group conducts on a regular basis, safety trainings and awareness programs for correct use of PPEs. Especially in case of COVID-19 pandemic period, trainings were carried out via webinars.

With regards to workplace accidents, OTE Group follows the steps described in detail below, according to the company's policy.

- Immediate announcement to the employee's supervisor. The "suffering" employee (or if not possible, a colleague of the employee) informs immediately his direct supervisor (by phone, via email, e.tc.) and he/she informs Health and Safety Unit, by calling an emergency five-digit hotline (13111).
- Immediate reporting of the accident to the top management via group e-mail "Workplace Accidents".
- Announcement of the accident from Health and Safety Unit to relevant authorities within 24 hours, via submission of an accident report form.
- Collection of medical history of employee and

relevant files of absence days for the monitoring due to workplace accident.

- Creation of a digital folder for each employee and including the case into a digital file that lists workplace accidents per year.
- Inspections of accident's place and conditions take place from the Safety Engineer who submits a report that describes the situation, proposed preventive measures and good practices for the avoidance of similar incidents in future. Meanwhile, the responsible Occupational Physician examines employee and decides about his/her ability to continue his/her work.

The need for any corrective actions is evaluated, in order to enhance Health and Safety in the workplace. In this context, the following actions are taken:

- Evaluating the possibility of updating the Occupational Risk Assessment, in accordance with relevant procedure.
- Conducting relevant trainings to employees.
- Issuing special Work Instructions, where required.
- Adopting additional means and measures of personal protection.
- Adapting work issues due to employee's needs, in particular with regards to the configuration of jobs' description or the choice of usage equipment.

It should be emphasized that if an employee considers a pending risk while conducting a work-related task, he/she can pause his/her job and call the supervisor and / or Safety Engineer, without any repercussions inflicted on the employee's employment.



## 2.1 EMPLOYEES | 2.1.4 HEALTH AND SAFETY

Furthermore, OTE Group health services act preventively towards the continuous improvement of the working environment, following the relevant provisions of Greek legislation and international health and safety standards. The occupational medical team which consists of Doctors and Nurses has an advisory role on occupational health and preventive issues, on a regular basis, responding to any kind of emergencies may occur. In addition, the medical team implements multiple wellbeing programs aimed at preventing and promoting health of employees or targeted group of employees.

The role of the Occupational Physician includes:

- Supervising health factors, conducting preventive medical examinations (periodic health check) and performing vaccination programs.
- Issuing advisory reports in cases of recruitment, change or reform of job role (e.g. for health reasons) as well as in cases of employees' reintegration in the production process after a serious illness or accident.
- Evaluating the employees' ability for each job and helping to deal with an emergency, accident, or sudden illness.
- Educating employees on multiple emergencies, such as First Aid and heart strain avoidance.
- Providing advice on ergonomics, work hygiene, job placement, workplace environment etc.

Additional Health and Safety duties that take place on a yearly basis include:

- Supervising Emergency Incident Response groups with regular evacuation drills.



- Implementing the hygiene standards model (HACCP) on all employees' dining areas and management of OTE Group's Blood Donation Union.

Moreover, OTE Group ensures that all Health and Safety information is communicated to employees and other stakeholders. Employees and their representatives are involved in development and review of processes, informed of the occupational risks and have the opportunity to express their opinion. They have access on information of workplace accidents and relevant forms. In this context, meetings are held

on a regular basis between Health and Safety representatives, Safety Engineers, Occupational Physicians and the elected employee committees. Finally, employees are encouraged to report each positive or negative comment related to Occupational Safety and Health (OSH), by sending an e-mail to the Health and Safety Unit.

## HEALTH &amp; SAFETY AWARDS 2021



OTE Group Human Resources Health and Safety Unit received several awards concerning its practices. Namely:

**WINNER OF TELECOMMUNICATION**

in the category of **Health & Safety Awards 2021 / Companies and Organizations**

**GOLD AWARD**

in "Preventing the Spread of COVID-19", in the category of **Health & Safety Awards 2021 / Preventing the Spread of COVID-19**

**EXCELLED IN "ACTIONS AGAINST COVID-19"**

in the category of **BRAVO Sustainability Dialogue & Awards 2021 / Actions against COVID-19**

## 2.1 EMPLOYEES | 2.1.4 HEALTH AND SAFETY

## Health and Safety Performance

The implementation of Health and Safety supervision and inspections for employees had to be adapted, according to the restrictive measures imposed by the COVID-19 pandemic.

In 2021, there were no fatal work accidents.

Health and Safety training programs were conducted in 2021 via webinars (instead of physical participation) due to COVID-19 pandemic restrictions. In this way, employees' training remains frequent and continues uninterrupted, regardless of the external factors.

In order to prevent workplace accidents, OTE Group ensures that technical staff is well trained for using the PPEs, which are provided by the company. All PPEs used are certified so as to meet appropriate standards. Moreover, OTE Group continuously conducts trainings, so as to raise awareness among technical staff (e.g. webinars for working safely at heights while using ladders).

## Health Promotion Initiatives

In 2021, OTE Group developed multiple communication channels so as to support all employees during the health crisis, which arose from the COVID-19 pandemic.

Health and Safety Unit strived to provide detailed and **continuous information** to all employees (posting instructions on the corporate intranet, sending direct emails and sms, and answering **>30,000 calls** via the **emergency medical hotline**).

Furthermore, the Unit organized a nationwide livestreaming digital conference for COVID-19 pandemic with a distinguished professor of Health Policy as guest speaker, who analyzed the progression of the pandemic nationally and internationally. The employees had the opportunity to ask the professor questions relevant to COVID-19 such as about the importance and need of vaccination for them, their children etc.

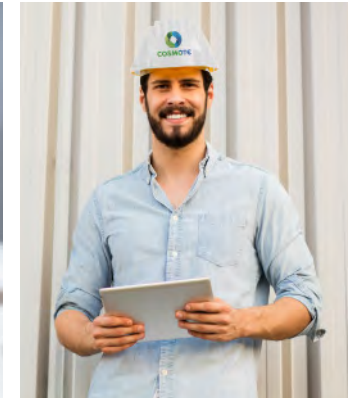
Finally, OTE Group conducted an anti-flu vaccination program in 208 premises nationwide, and 2,458 employees were vaccinated.

## Awareness and Prevention

"Live better..." is OTE Group's long-term health, safety and wellness program, which, every year, includes a pallet of actions and events for employees.

This year, the annual awareness action plan was designed, while taking into account the restrictions against COVID-19 pandemic (**digitally** during all year or with **physical presence, whenever possible, and with all protection measures in place**) and focused on actions for protection, awareness and motivation of a self-care culture in all employees' daily life. Indicative actions of this year's "Live better" program where:

- **Webinars for the promotion of health and wellness in daily life** (topics related to health, sleep, ergonomics for employees and their kids).
- **One-to-one sessions** in central premises with expert occupational physiologist, dietician and



physiotherapist aiming to inform, support and encourage employees in their daily life.

- **Webinars targeted in handling specialized health issues** (e.g. topics related to infertility or children with special needs).
- **Actions targeted in dealing with emergency situations** such as Protection from Earthquakes and First Aid trainings (a nationwide livestreaming digital event related to Earthquakes and Protection, with the participation of distinguished professor of Natural Disaster Management, and First Aid informative webinars for child injury emergencies nationwide added extra of the timeless first aid training program for adults).

Furthermore, additional actions to **prevent COVID-19 spread** continued and during this year, such as:

- Implementing **tailor-made actions** for all units (e.g., front line, back office, on call etc.), basing decisions on the local epidemiological data.
- Implementing an integrated **COVID-19 case**

**management procedure**, in collaboration with the State by Occupational Physicians' Team of the Group.

- **Supplying large quantities of personal protective equipment** against COVID-19 (gloves, masks, e.t.c.). OTE Group procured almost 460,000 masks (surgical, FFP2, fabric e.t.c.), over 4,100 packages of gloves, 276 special uniforms and over 3,100 self - tests for COVID - 19 detection and mobilized all the necessary mechanisms for immediate delivery to all OTE Group buildings and stores throughout Greece.
- The customer information process for arranging appointments in shops or with technicians, in order to maximize protection of employees, continued in 2021 (e.g., ventilation of space before the visit of the Technician, etc.).

Finally, OTE Group continued to offer preferential prices to employees and their family members for PCR (Polymerase Chain Reaction) tests, in cooperation with specific diagnostic centers.

## 2.1 EMPLOYEES | 2.1.4 HEALTH AND SAFETY

### TRAINING ON SAFETY ISSUES



Approximately **4,560 hours** of **safety training programs** were carried out in 2021:

- Work with safety at heights – Use of portable ladders - Webinars.
- Training program for work at heights for climbers and extra training slots for the approach of telecommunication towers under adverse weather conditions.
- Risks and Hazards in Workplace - Prevention of Workplace Accidents.
- Trainings for technicians in distributors.
- Training on fire safety and earthquake preparedness and response for safe evacuation (Incident Response Teams-IRT) and extra training slots especially for employees living in high earthquake activity areas.

### PSYCHOLOGICAL SUPPORT CONSULTING SERVICES

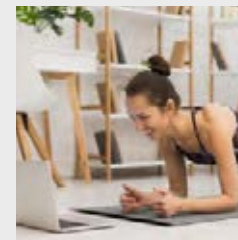


- **24-hour telephone support line NEXT TO YOU**, for mental and emotional counselling.
- **Individual sessions with specialized mental health counselors** via face-to-face meetings (with all the necessary protective measures against COVID-19) or online, for all employees.
- In collaboration with distinguished professionals of Hellas EAP, OTE Group carried out specially designed informative **live webinars**, aimed at well-being, self-improvement and maintaining work-life balance (e.g. Parental role for all ages, Resilience, Salesmen Empowerment and Support for customers' best handling on special cases).
- Over **780** employees have been supported and received helpful advice and counselling from psychologists.

### WELLNESS INITIATIVES



A new digital dimension of wellness was given to Health and Safety actions **because of the restrictions in place, during the pandemic period**. Wellness programs based on enhancing fitness, well-being, and work-life balance (physically or digitally) included the following:



- **The Coach Wellness platform** (dance, Pilates, yoga, training). Free for all employees and their families, access from any device, 24/7.
- **Mind and Nourishment live webinars:** with specialized nutritionists and psychologists for all employees nationwide for better nutrition and healthy eating habits. Extra, tailor-made sessions took place for store employees.
- **Team sport activities:** 5x5 football, basketball, volleyball, tennis games, running training team and outdoor training. Furthermore, this year, 110 employees participated in 3rd World Company Sports Games which took place for the first time in Athens. OTE Group won 13 awards in 6 sports.
- **Indoor activities:** Gym in Paiania premises of OTE Group and mild physical exercise training groups in central premises via personal e-booking reservation meetings.

## 2.1.5 Employee Selection, Attracting and Retaining Talented Employees



### OTE GROUP INVESTS IN ITS STRONGEST ASSET, ITS HUMAN CAPITAL

in order to fulfill its highest purpose: to create “a better world for all” through technology and innovation. Its people stand out for their excellent know-how, professional experience, sense of responsibility and growth mindset. The human resources development approach is based on the Guiding Principle “Stay curious and grow”.

The profile of a modern and attractive employer lies in successful practices concerning performance management, recruitment, and selection of suitable candidates for the right positions, retention and talent management.

The new Diversity, Equity and Inclusion Policy introduced KPIs for diverse gender candidates for all managerial roles. More specifically, the gender quota to be achieved within 3 years, is 25% of Board members to be women and 30% of Senior and Senior Managers respectively.

#### Performance Management

Performance management is a fundamental tool, not only for identifying the work output and contribution of employees and executives, but also for initiating and supporting the creation of solid individual development plans.

All companies of OTE Group conduct an annual performance evaluation of employees on all hierarchical levels. The performance management

system, which enables employees to achieve high performance and continuously develop, is:

- Modern, flexible and reliable.
- Objective and transparent.
- Based on both targets and competency elements.
- Aligned with the Group’s Guiding Principles.

Moreover, the sustainability principle relating to the treatment of employees with respect and integrity,

is part of the Group’s Guiding Principles and employees’ performance evaluation.

To ensure a common understanding and enable employees’ evaluation, a dedicated digital platform, where employees can reach for relevant information and training material, is available to all OTE Group employees.



## 2.1 EMPLOYEES | 2.1.5 EMPLOYEE SELECTION, ATTRACTING AND RETAINING TALENTED EMPLOYEES

Employees taking up for the first-time positions with managerial responsibility, undergo dedicated training on how to evaluate their teams and create individual development plans for their people. In 2021, 94 newly appointed managers attended the relevant Performance Management training.

### Employee Selection

OTE Group seeks to enhance its potential with candidates suitable for joining agile structures and working in demanding projects, both inside and outside the countries of operation. The aim is to attract specialized professionals, who will be able to cater for the Group's transforming operations and demanding customer needs. At the same time, the Group seeks to attract people who wish to work in an international, modern, and ever-evolving working environment.

#### Internal recruitment process

As of 2017, employees have access to the corporate digital job search platform "HR-Suite", where they can apply for positions within the Group and explore international career opportunities at DT Group. "HR-Suite" is based on a cloud system which combines and interconnects different HR products in one HR IT System.

The recruitment process for internal positions involves the internal announcement of job openings, a subsequent interview, and the final selection. It is supplemented by an assessment exam, which, if required, takes place in collaboration with an external consultant. In



2021, 79 positions were internally filled within OTE Group.

#### External recruitment process

The new recruitment process for non-executive positions involves interviews and corresponding assessment activities, with input from external consultants, where necessary. In 2021, 256 employees were hired by the Group's companies.

It is worth mentioning that more than 20,000 candidates submitted their CV to the OTE Group's database, expressing their interest to join the Group.

In 2021, the Group actively participated in more than 38 career events and job fairs, organized by public and private institutions (educational and other entities), thus enhancing its employer of choice profile and attracting new candidates. The Group focuses on building strong relationships

#### INTERNSHIPS GREECE

23

university and technical school students completed an internship in 2021 at OTE Group companies in Greece

3,318

young men and women selected OTE Group internship programs in the period 2015-2021

with the University community, in Greece and abroad, aiming at attracting top talent with specialized know-how.

In a comprehensive and modern working environment, opportunities are offered to students, such as to interns, in order to apply in practice, the knowledge that they have gained from their academic course. Cooperation with educational institutions, strengthens the Group's relationship with young people, facilitating their transition to the requirements of the labor market.

OTE Group designs and implements high-tech ICT projects for the private and public sectors, contributing to and accelerating the transition of businesses to the digital age. OTE Group recently being awarded the best "ICT Provider of the decade" resulting in new job opportunities arising for specialized profiles.

### Talent Management

OTE Group systematically invests in identifying and developing young talents. In this context, contemporary internal and external talent management programs have been developed, each addressed to a different audience.

The Group's internal talent program for young employees is entitled "you.grow". The program provides participants with the opportunity to gain an insight of all key business operations, through an 18-month on-the-job, rotational developmental journey. Upon successful journey completion, participants take on job roles consistent with their qualifications, their personal preferences and the company's needs.

The Group's external talent program is entitled "COSMOTE Graduate Trainee Program". The program targets talented young university graduates, who have ambition, passion and are willing to develop their career within OTE.

Another talent program, addressed to employees within the GERMANOS Franchise Retail Stores Network, is "G-Talent Review". The program aims at identifying a "pool" of high potential talents within the retail network, who have the drive and ambition to join OTE Group in a job role, which matches their profile and preferences.

Finally, as part of the Deutsche Telekom Group talent management initiatives, OTE Group employees in Greece can apply to participate in **Global Talent Initiatives**. These initiatives provide the opportunity to create a wide international network of professional contacts, participate in contemporary learning / training initiatives and, if internationally mobile, undertake a short project or job exchange, or take on a new role.



## 2.1.6 Employee Training and Skills Development

### WHY IT MATTERS

A core part of OTE Group's strategy is to empower its employees and support them to develop the necessary skillset to succeed within the Group, grow personally and professionally and make progress in their professional career. In this context, it offers a plethora of online and in-class upskilling and reskilling training courses, available for all employees.

OTE Group, considers learning as a life attitude and constantly encourages its people to take advantage of every opportunity of development being offered to them.

In 2021, due to the new conditions regarding COVID-19 pandemic, most of OTE Group training activity was conducted digitally. In order to offer a more personal approach to all virtual classrooms, an in-house Learning studio had been created, fully equipped and capable to provide live streaming, trainings, team events, video recordings etc.

This year, more than 95% of total training hours were held in digital classrooms, with the use of various modern digital training and interaction tools, significantly enhancing the training experience of employees.

At the same time, OTE Group intensively focuses on continuous learning via the digital learning

platforms Percipio and Coursera, which are available to all employees.

In accordance with the needs of the Group, upskilling and reskilling programs were designed and implemented periodically, throughout the year. Moreover, leadership skill-development tools are provided to executives with team management responsibilities.

All required actions for the design, implementation and evaluation of employee training programs are described in the "Managing Human Resource Training" process, which is available to all employees through the companies' intranet.

OTE Group, believes in an open and continuous development learning culture for all, therefore it has prepared a new skill management process and tool, to be announced within 2022, where employees will be able to see the required skillset, professional and social, for their role and follow a more focused and dedicated journey of learnings.

### Digital Learnings

By investing in digital learning platforms, employees have boundless and at the same time, equal opportunities not only to improve their existing skills, but also develop new skills that are needed in the new digital era, so as to maintain their competitive advantage and be able to face any professional challenge.

In 2021, the total hours of digital education increased significantly compared to 2020.



50,358 training hours through digital platforms

28,616 training hours through digital platforms Coursera and Percipio; 24% increase compared to 2020.

**Click2Learn:** A smart learning guide designed to encourage the participation of digital courses in the Percipio and Coursera learning platform. The guide offers **different learning paths** per function/role such as Marketing, B2B and Agile. The guide is constantly enriched with new, more specialized thematic modules, available to all OTE Group employees. Click2Learn offers a great opportunity to take learning into employees' own hands.

### Agile Learning

In a continuously changing business environment, OTE offers new training courses on Agile topics. These agile programs empower employees to become acquainted with the agile way of working and different agile methodologies (i.e. **Scrum**) and to incorporate them to the Group's business environment. In 2021, 281 employees participated in such courses.

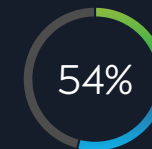
### TRAINING IN 2021

>4,600

EMPLOYEES OF OTE, COSMOTE AND GERMANOS ATTENDED ONLINE



213,277  
HOURS OF TRAINING



OF EMPLOYEES WERE TRAINED (55% OF MALE & 45% OF FEMALE EMPLOYEES)

19,459

PARTICIPATIONS IN TRAINING PROGRAMS

€4,012,198

INVESTED IN EMPLOYEE TRAINING IN GREECE

18.93

TRAINING HOURS PER OTE GROUP EMPLOYEE

13.52

TRAINING HOURS PER OTE GROUP EMPLOYEE IN THE TOP 10% OF EMPLOYEES BY TOTAL COMPENSATION, IN GREECE

17.39

TRAINING HOURS PER OTE GROUP EMPLOYEE IN THE BOTTOM 90% OF EMPLOYEES BY TOTAL COMPENSATION, IN GREECE

## 2.1 EMPLOYEES | 2.1.6 EMPLOYEE TRAINING AND SKILLS DEVELOPMENT

## 2021 TRAINING PROGRAMS IN GREECE

### B2B NEW BUSINESS ERA

Extensive tailor-made training program of high value, covering all aspects of contemporary B2B areas such as Customer centric culture, Technology acumen and self-awareness and collaboration courses.

### THE GRID

A learning journey for new agile teams, supporting them in learning the agile methodologies, in order to contribute to the success of their agile team. For specialized roles we offer additional advanced trainings and certification.

### MINDSET

This program took place both digitally and physically. This revolutionary soft skill e-learning program summarizes the concepts of "GROWTH MINDSET" and aims to expand employees' educational and personal perspectives.

### CX. YOU TRAINING PROGRAM

OTE Group's strategy training program for Customer Experience was redesigned, in terms of digital era challenges focusing on Customer journey mapping. This program was digitally implemented due to the evolving situation associated with the COVID-19 pandemic.

### SHOP QUALIFICATION PROGRAM (SQP)

SQP offers participants the opportunity to take a comprehensive training course in Telecommunication Products and Services, providing them with the requisite sales-related skills and expertise, enabling them to provide a high customer experience.



450

60

164

1,776

208

### TECHNICAL QUALIFICATION PROGRAM (TQP)

This program provides employees with the skills needed for a technical role and offers participants the ability to undergo comprehensive training in the fields of network engineering, copper and fiber optics.

### NETWORK ARCHITECTURE AND FIBER TO THE HOME (FTTH)

The program's goal is to strengthen employees' skills in the field, providing them with the necessary knowledge for wholesale and retail networks as well as problem solving. In addition to the theoretical part, the participants apply practice their acquired skills through the use of virtual reality (VR).

### IT NEXT GEN MASTERCLASS SERIES

The IT Next Gen Academy - a cutting edge reskilling and upskilling program - is addressed to OTE Group IT employees to help them acquire new technology and digital skills and further stimulate their professional career. Participants have the opportunity to be trained in various topics, starting from basic concepts of new IT Architecture and continue to more specialized areas.

### POSTGRADUATE PROGRAMS

Postgraduate programs offer learning experience, completely focused on professional expectations, expanding employees' knowledge and enriching their skills.

Nominated by their business, professionals with potential and love for personal growth, may apply to a Postgraduate Program of their choice, granted 50% by OTE.



84

439

173

12



## 2.1.7 Employee Communication, Engagement and Satisfaction



### GROWTH MINDSET CULTURE, CROSS FUNCTIONAL COLLABORATION AND OPEN COMMUNICATION

is the cornerstone of OTE Group's employee work culture. Employees are systematically informed on strategic, technological, and commercial issues, through internal communication channels, as well as through programs and workshops which are organized in an experiential and interactive manner.

#### Programs for Employee Commitment, Engagement and Change Management

##### COSMOTE Awards

This initiative was designed and implemented for the first time in 2018, with the aim of highlighting employees' contribution to important company's projects that are fully aligned with the Group's strategy. In 2021, team submitted their

participations to the four following categories: digital company, customer obsession, the new normal and innovation and startup mindset. In total, 32 projects were submitted. Thirteen of these projects stood out, with 1st and 2nd place participants being awarded €5,000 and €2,000 respectively, at the annual awards' digital ceremony. An "Employees' Choice Award" was introduced for the first time and a special award was given to the winning team.

#### Employee Satisfaction

OTE Group aims to maintain transparent and interactive communication with its employees, utilizing a wide range of communication platforms. The aim is to promote knowledge, teamwork, participation, and a two-way communication channel.

#### Employee Surveys

Employee surveys have been established as part of the Group's workplace culture. The "Pulse" Survey, which includes 25 questions, is conducted twice per year and a more elaborate Employee Survey, which includes approximately 80 questions, once every two years.

2.1 EMPLOYEES | 2.1.7 EMPLOYEE COMMUNICATION, ENGAGEMENT AND SATISFACTION

In 2021, 2 additional surveys were conducted ("Europe Pulse"), with 5 questions, which focused on Employee's Satisfaction and the company's strategy.

Participation numbers remain high throughout the Group. In 2021, the average participation rate of all 4 Surveys in Greece was 80%. In Romania, 85% of Telekom Romania Mobile Communications employees participated in the most recent (2020) Employee Pulse Survey.

The Employee Survey is a dynamic and reliable diagnostic tool, which identifies possible improvement actions and helps the units design their future plans. It evolves to reflect elements of the strategy and the objectives of OTE Group, as well as trends that dominate the external environment. It is utilized to determine and analyze trends regarding cultural and strategic topics.

The high participation rate reflects employees' strong interest to engage and express their views on important issues which affect their working environment. Digitization, innovation, engagement, customer centricity and people development are some of the key survey topics, which reflect the Group's vision and give direction for changes that will be launched in the future working environment.

INDICATIVE INTERNAL COMMUNICATIONS CAMPAIGNS AND PROGRAMS **FOR THE EMPLOYEES' ENGAGEMENT**



- **Motivational campaigns** inducing corporate volunteering actions and supporting the companies' social initiatives, such as the Blood donation program, the Athens Authentic Marathon participation for a good cause and the bone marrow donation program.
- **"Cosmotel" and the brand new "Cosmopop"**, two engagement programs addressed to Customer Operations, bring together about 7,000 employees of COSMOTE e-Value call centers and COSMOTE and GERMANOS shops, giving them the opportunity to have fun, play and gain prizes. For the second consecutive time, due to the pandemic, those programs ran digitally.
- **Year-round and ongoing engagement program "ICE"** addressed to retail network employees (@COSMOTE shops).
- **Awareness/call to action campaign "#ZEROPLASTIC"** for drastic reduction of plastic. Through #ZEROPLASTIC program COSMOTE educate employees apart from plastic reduction, to apply in their daily lives the 3 basic principles of Circular Economy: Refuse, Reduce, Reuse, and to adopt environmentally friendly habits, putting in their daily lives' reusable objects.
- **Christmas Activations:** A multi-dimensional set of activations, which includes digital games, raffle prizes, treats and heartening community activities, aiming to keep employees' spirit high during Christmas period, which was very different from previous years, due to the pandemic.

INTERNAL COMMUNICATION **DURING COVID-19**



Communication acted as a catalyst during the COVID-19 pandemic. COVID-19 disrupted and changed the way OTE Group employees' work and everyday life. The objective was to build clear messages and ensure the information is disseminated to all Group employees. The Group strived to provide credibility and trust, as well as maintain employees' attention and engagement.

More specifically, the Internal Communication team:

- Capitalized on its specialization and know-how creating a solid COVID-19 communications strategy that created key messages and disseminated information (guidelines, measures, etc.) to engage with employees, as well as to contribute to the Group's effort and need to safeguard employees' morale, feeling of trust, and belongingness.
- Managed the internal communication channels and used them efficiently, maximizing the messages' dissemination and acceptance.
- Capitalized on its "helicopter" company view ability, regarding the communicational needs and opportunities of numerous units within the Group and Top Management, by acting as their strategic communication partner. This resulted to better alignment, calibration, and higher quality of the overall internal communication activity.

## 2.1 EMPLOYEES | 2.1.7 EMPLOYEE COMMUNICATION, ENGAGEMENT AND SATISFACTION

## COSMOTE E-VALUE NEW INTERNAL COMMUNICATION CHANNEL

In March 2020, during the outbreak of the COVID-19 pandemic in Greece, COSMOTE e-Value launched the “Yasou” microsite. The microsite is an informative and entertaining internal communication online platform, addressed to the Group’s 6,000 call center employees, aiming to sustain employee engagement, during lockdown and teleworking.

In 2021, taking into account that 70% of the employees of the call center industry works from home, “Yasou” microsite continues still to be a relevant and vivid communication tool. “Yasou” is here to stay. At a time when everyone needed an even more direct, modern and up-to-date contact on the issues that concern them, the microsite covered the needs that arose, offered a different way of daily communication with COSMOTE e-Value employees.

The microsite informs, entertains, and keeps the interest of employees alive, with fresh content for all tastes. The goal was, and remains, for every employee to feel like an active member of a big team.

The initiative has been named a finalist in the European Contact Centre and Customer Service Awards 2021 in the Best Employee Engagement Program category. “Yasou”, in 2020 received in total 4 awards in the Digital Media Awards (Dime Awards).

In order to celebrate one year of “Yasou”, a digital party was organized with the participation of the Management Team. In April 2021, about 2,000 employees connected via mix cloud and had the opportunity to play games online, win big prizes and chat with their colleagues.



### SOME INTEREST HIGHLIGHTS OF THE “YASOU” MICROSITE INCLUDE:

**12,413**

ARTICLE READINGS WERE RECORDED

**41**

NEWSLETTERS IN 1 YEAR

**2**

CONTESTS FOR COSMOTE INSURANCE AND BOX WITH GIFTS FOR THE PARTICIPANTS

**71%**

FEMALE VISITORS

**29%**

MALE VISITORS

**340**

ARTICLES

**1**

ONLINE PARTY ON MIX CLOUD





## 2.1 EMPLOYEES | 2.1.7 EMPLOYEE COMMUNICATION, ENGAGEMENT AND SATISFACTION

**NEW “HEALTHY ME”**

VIRTUAL COMMUNITY IN ROMANIA



In 2020, following the outbreak of the COVID-19 pandemic, the “HEALTHY ME” program was created, and the program ran also in 2021. The program was created by company employees, whose mission was to identify volatile mental health issues that employees suffered during isolation in the COVID-19 lockdown. As part of the program, a common virtual space was provided, offering employees the opportunity to improve their health in all its aspects, by participating in sports, training or learning events and providing recommendations and other resources around well-being. The program consisted of 5 streams: Healthy Body, Healthy Mind, Healthy Learning, Healthy Community and Healthy Lead.

**ROMANIA**

SIGNIFICANT DATA 2021



&gt;25

ISSUES OF WEEKLY NEWSLETTERS  
WERE SENT TO APPROXIMATELY

1,000 EMPLOYEES

&gt;300

INTERNAL ANNOUNCEMENTS  
WERE COMMUNICATED TO EMPLOYEES

&gt;100

INTERNAL CAMPAIGNS AND OTHER SUPPORT ACTIVITIES  
FOR THE EMPLOYEES WERE DEVELOPED



SOCIETY  
**Customers**

**>€3bn**

INVESTMENT PLAN  
UNTIL 2027

**560k**

FTTH LINES

**60%**

NATIONWIDE  
COSMOTE 5G COVERAGE

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## 2.2.1 Connectivity for All



### THE GROUP CONTRIBUTES TO ACHIEVING THE 2021 DIGITAL AGENDA TARGETS

by investing in the upgrade and expansion of its telecommunications infrastructure. OTE Group has the ability, know-how, and financial base to continue to support the transformation of Greece into a Digital Country.

The Group is the largest investor in new technologies and infrastructure in Greece, making significant investments in New Generation Networks, which will stimulate the Greek economy and enhance the highest growth potential. **With approximately €5bn in investments over the last decade and through a sharp increase in future investments that will exceed €3bn by 2027**, OTE Group is moving towards offering higher data speeds and greater coverage in fixed and mobile telephony.

Even though there is wide availability of broadband services for fixed and mobile telephony covering almost **100% of households in Greece**, only 77% overall use the fixed broadband services.

#### Greece

As a result of its extensive investments, the Group currently holds the largest fiber optic network in Greece. In 2021, OTE continued the roll out of its Fiber-to-the-Home (FTTH) network, offering

~100%

AVAILABILITY OF BROADBAND SERVICES FOR FIXED & MOBILE TELEPHONY IN GREECE

77%

OVERALL USE THE FIXED BROADBAND SERVICES

## 2.2 CUSTOMERS | 2.2.1 CONNECTIVITY FOR ALL

guaranteed internet speeds of 100Mbps and 200Mbps, with the potential of future upgrade to 1Gbps.

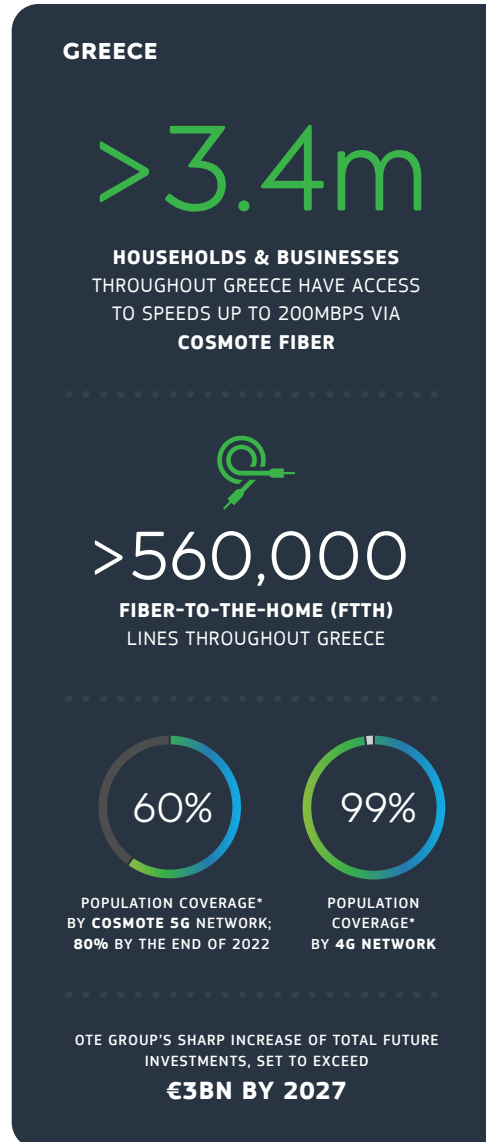
By the end of 2021, access to FTTH unlimited capabilities was available to 560,000 households and businesses across Greece. OTE Group is aiming to reach 1,000,000 FTTH lines by the end of 2022 and 3,000,000 by 2027.

COSMOTE, within just one year since the launch of the 5th generation network that was first to deploy in Greece, achieved the target of 60% Greece-wide population coverage of COSMOTE 5G.

Today, COSMOTE 5G is the largest 5th generation network in the country with coverage in Athens and Thessaloniki already exceeding 97% and 90%, respectively. Network maximum speeds exceed 1Gbps in specific areas. COSMOTE 5G is expanding rapidly throughout Greece, with the aim of reaching 80% population coverage by 2022.

Additionally, COSMOTE, the largest 4G network in Greece, with population coverage\* approximately at 99% continues to develop and upgrade in order to ensure seamless connectivity and communication even in the most remote parts of Greece.

In 2021, COSMOTE mobile network was declared by Ookla, the global leader in broadband, 99% coverage network intelligence, as the "Fastest Mobile Network" in Greece for the 5<sup>th</sup> consecutive year. It also received from the internationally recognized network benchmarking company Umlaut, the "Best in Test" certification for mobile internet and voice services overall and in the individual benchmarking tests, for the 7<sup>th</sup> consecutive time.



#### COSMOTE'S MOBILE NETWORK CERTIFICATIONS



**GREECE'S FASTEST  
MOBILE NETWORK**  
award for the 5<sup>th</sup>  
consecutive year  
**BY OOKLA**



**BEST IN TEST**  
for voice and data  
services for the 7<sup>th</sup>  
consecutive time  
**BY UMLAUT**

#### Romania

With respect to the priority of providing reliable mobile voice coverage for all Romanians, the 2G / GSM network exceeds the 99% population coverage threshold. All infrastructure has been upgraded to support 4G/LTE data services. The 4G coverage exceeds 98% of the population, approaching the voice services percentage. In addition, Telekom Romania Mobile has already tested 5G antennas from Bucharest International Airport to the center of Bucharest and the results

showed top reception speeds of over 260 Mbps download speed, while the average values recorded were at approximately 150 Mbps.

#### Affordable Prices for All

Through its brands, the Group offers packages covering a wide range of different residential and business needs concerning the use of internet, mobile internet data, voice calls and additional ICT services, at competitive prices, offering the best customer experience. A variety of products and services at different prices, aiming at making them affordable for everyone and tailored to their needs.

#### Greece

**Residential customers** can acquire FTTH at a basic rate plan by using the Government's subsidy (**SFBB Coupon**).

Especially for students, COSMOTE reduced the price of existing fixed programs Double Play 50Mbps and launched new price for Double Play Fiber speed 100Mbps.

In terms of customer experience and cost control scope, COSMOTE also created a functionality in My COSMOTE App & Portal where the fixed line customer can be constantly aware of its remaining talk time with no cost.

Furthermore, a new portfolio of fixed programs combined with a new TV content service was launched, offering high Internet speeds and personalized TV content at competitive prices.

Households with COSMOTE Double Play or Fixed Mobile Convergence services are able to get free

\* Population coverage refers to Outdoor Coverage.



2.2 CUSTOMERS | 2.2.1 CONNECTIVITY FOR ALL

WiFi access to **COSMOTE WiFi**, which is the largest WiFi network in Greece.

Additionally, COSMOTE Double Play SIM was further utilized in order to offer a solution for those customers in remote areas who are not able to acquire a fixed broadband line due to fixed network unavailability. This solution offers customers Internet via the 4G mobile network plus a fixed-line phone number.

In terms of subscription TV, COSMOTE offers its customers its own new service product of COSMOTE TV where subscribers are able to:

- Connect via the internet without a satellite receiver and enjoy its rich content wherever they are.
- Enjoy personalized content based on their use and interests.
- Download their favorite content and watch it offline.
- Watch On-Demand and Live TV content in the same menu and enjoy a great viewing experience.

COSMOTE TV Streaming service is commercially available with a multitude of options and combinations. There are also available packages without commitment for those customers that want to watch the content they wish for limited time period or even for a day to watch only the sports match they prefer.

In 2021, COSMOTE launched **COSMOTE Neo**, the first 100% digital mobile plan that subscribers can acquire and activate exclusively through their mobile phones. Subscribers can build their own plan based on their needs with excess GB and voice minutes starting at €20. There is flexibility to change GB and voice minutes every month and in addition, there is no commitment since subscribers



can end their plan whenever they want and activate it again at any time, they need it. All these functionalities are exclusively present at My COSMOTE App.

During 2021, COSMOTE, taking into consideration the numerous communication needs of its customers in Greece made a series of dedicated offers for all customers throughout the year:

- Free Unlimited data during Easter for postpaid customers.
- Free Unlimited Data for five consecutive weekends during Holy Spirit period for both prepaid and postpaid customers. Free Unlimited calls from fixed line telephones to all fixed and

mobile devices, Unlimited data for all prepaid and postpaid customers, BOX special offers and one-month free TV entertainment pack to all customers during Christmas period.

- Extra mobile data bundles at low price for bank holidays and/or special occasions.

Additionally, COSMOTE acknowledging the unusual and disruptive situation due to covid-19, while supporting its role as the digital enabler, made a series of dedicated offers for fixed and mobile customers. Especially, taking into consideration the different and immediate communication needs, COSMOTE offered throughout the year:

- 10 days free unlimited data (Easter offer for postpaid subscribers)
- 10 days unlimited data, only €4.90 (Easter offer for prepaid & cost control subscribers)
- Free unlimited data for all weekends between the 22nd of May and the Holy Spirit holiday, 21st of June.
- One-month unlimited data, only €9.90 (Summer offer)
- Free UNLIMITED data for 7 days (Fall offer)
- 10GB for free, for 7 days (Xmas offer).
- 1500 minutes free talk time to all for 7 days (Xmas offer).
- Free UNLIMITED data for a fortnight (Xmas offer).

In 2021, further improved DIY and new student DIY packages were offered to prepaid **What's Up** customers, exclusively through the What's Up application, allowing customers to create the package that fully covers their own needs. DIY packages combine voice minutes, SMS and data packages, with options of abundant mobile data for social and chat apps as well for streaming purposes, at an attractive price.

• At the same time **COSMOTE One** - the COSMOTE loyalty scheme for subscribers who combine at least one fixed line and one mobile line – further enhanced its benefits by offering double data for all customers to Gigamax Individual and Family rate plans and at the same time improved the digital customer experience in COSMOTE App for all Household's members.

**Business customers**, similarly, to the residential ones, can acquire FTTH at a basic rate plan by using the Government's subsidy (**SFBB Coupon**). Moreover, **COSMOTE Business One** program



2.2 CUSTOMERS | 2.2.1 CONNECTIVITY FOR ALL

enables businesses to operate more efficiently and cost-effectively. The program includes communication solutions for each one of the businesses' employees, including extremely fast Internet speeds via the largest fiber optic network in Greece (**COSMOTE Fiber**), as well as advanced Private Branch Exchange (PBX) services per employee, security services for both fixed and mobile devices, Internet Backup and File Backup, as well as cloud services such as Business Email (100GB/15 email accounts).

**COSMOTE Business Double Play** along with COSMOTE Internet Backup, (a service provided in a competitive price along with Business Double Play) offers to every Business the opportunity to be always connected to the Internet, thus ensuring its efficient operation at all times.

COSMOTE provides a wide range of **Business Cloud applications** which offer direct and easy access to cloud applications that meet their operational needs and reduce their operational costs. Namely:

- **Hoteliga**, offers hotel owners a useful tool to manage their procedures (e.g. bookings, facilities, services etc.) remotely.
- **Microsoft 365**, provides businesses with tools required for flexibility and continuous cooperation from anywhere. Microsoft 365 is offered with 12% discount for installing 15 licenses or more.
- **COSMOTE Business Cloud Servers**

The mobile portfolio **COSMOTE Business GIGAMAX Unlimited** offers unlimited data to B2B customers, with absolutely no limitation in speeds, as well as

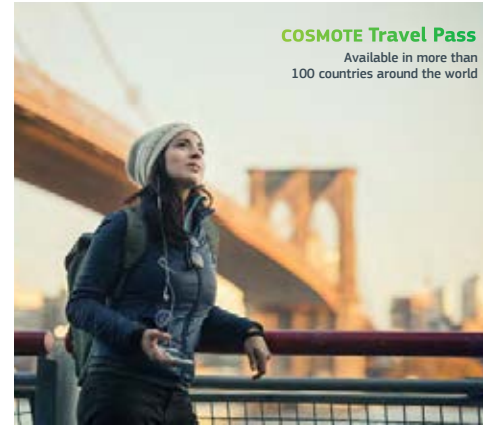
unlimited national voice minutes through the biggest mobile network in Greece. Furthermore, with the new **COSMOTE Business GIGAMAX** subscribers get abundant data, and have the option to receive unlimited data, by activating the exclusively integrated Data Boost service, via My COSMOTE App.

Business subscribers can choose between six different rate plans, to determine which one best suits their business needs. In addition, COSMOTE offers affordable mobile data add-ons, which provide customers with a faster and more affordable mobile internet service. Similar to residential customers, business customers can renew their COSMOTE program with either a discount in a mobile phone purchase or with a reduction in their contract's fixed cost.

COSMOTE also extended its cooperation with foreign networks to offer reliable roaming services to both business and residential travelers. In addition to that, the roaming service **COSMOTE Travel Pass**, enabled subscribers to use their national tariff plan abroad in more than 100 countries all over the world at a low daily cost.

Responding to the needs of small and medium businesses for solutions which will help them evolve and grow in an efficient and cost-effective manner, COSMOTE offers a multitude of suitable services, namely:

- **COSMOTE Asset Tracker**, a service through which all mobile equipment of a business, such as machinery, tools, trailers, cranes etc, can be managed and monitored remotely.



- **COSMOTE Digital Marketing4U** helps businesses promote their website or social media accounts on Google and social media platforms.
- **COSMOTE Fleet Tracker** through which fleet managers can manage all of their vehicles and monitor easily and effectively their business fleet at a low cost.
- **COSMOTE Click & Site** allows B2B customers to turn their professional Facebook page into a website with e-shop, if they choose to, which can support unlimited number of products.
- **COSMOTE My Internet** protects B2B customers from any additional/unwanted charges. The service provides real-time information of the available GB, sends instant notifications when the available GB runs out, and gives the user the option to decide how he/she wants to continue navigating. The service is offered free of charge for all B2B customers (postpaid & COSMOTE Business Mobile Cost Control).

Romania

In 2021, Telekom continued to offer innovative services with unlimited benefits to its mobile customers at a great value for money.

In November Telekom Romania Mobile Communications announced major changes for customers with a new brand promise that puts the customer at the heart of all the company's initiatives: "Mobile as you want. Simple and fair".

As one of the biggest wishes of the Romanian customers is to get fair treatment from their telecommunications operators and to have smooth access to the most attractive promotions, Telekom Mobile took the first step and abolished the gap between attraction offers for new clients and retention offers for current subscribers.

In the spirit of the new brand promise, Telekom also launched the new Nelimitat WiFi service, offering unlimited portable internet anywhere, anytime, on any device: smartphone, smart TV, laptop, tablet.

## 2.2.2 Products and Services for Sustainability



### OTE GROUP OFFERS INTEGRATED & INNOVATIVE TECHNOLOGY SOLUTIONS

to enhance business and sustainable development. Through products and services, customers make the most of the benefits of using broadband services to improve their operation, environmental performance and prosperity.

In 2021, **COSMOTE's B2B portfolio** has been enriched to meet business needs and increase their competitiveness in a sustainable way. Indicatively, some of these solutions facilitating sustainable development are described in this section.

#### BUSINESS CLOUD AND APPLICATIONS



OTE Group provides cloud services for businesses, in order to help them improve their operations and flexibility, while reducing their operating costs at the same time. Some of which include:

- **COSMOTE Business Cloud Servers**
- **Microsoft 365**, which has been enriched with the Premium Support service. With the Premium Support service, a Microsoft-certified COSMOTE technician configures business emails remotely, quickly, and securely.
- **Enterprise Cloud Services** in partnership with Microsoft, that enhance productivity and accelerate the digital transformation of businesses:
  - Azure Services
  - Assessment Services
  - Modern Workplace Solutions
  - SAP to Cloud
  - Data and Analytics

In 2021, the Business Cloud and Applications service line generated remarkable results, namely:

- **59.7% increase** in total COSMOTE Public Cloud SaaS revenues in Greece compared to 2020.

## 2.2 CUSTOMERS | 2.2.2 PRODUCTS AND SERVICES FOR SUSTAINABILITY

### FLEET MANAGEMENT



Fleet tracking and management, to ensure "green" and safe driving, as well as reduce operating costs, through the use of machine-to-machine communication, enabled by IoT.

- COSMOTE Fleet Tracker
- Driving Performance
- COSMOTE e-Track
- e-Fuel Management

In 2021, the Fleet Management service line generated remarkable results, namely:

- **65% increase** in fleet management revenues in Greece compared to 2020 revenues
- **48% increase** in number of commercial vehicles using the fleet management service in Greece compared to 2020.

### INTERNET OF THINGS (IoT)



Interconnection of devices, systems and equipment within a business contributes to better management of resources, important reduction in operational costs, as well as highlighting a "green" profile.

**COSMOTE Asset Tracker** service allows remote monitoring and management of a business' equipment. Using a GPS device with built-in temperature, humidity, barometric pressure and light-exposure sensors, it allows businesses to always maintain the environmental conditions required. Moreover, by utilizing the new network, **Narrowband IoT (NB-IoT)**, which COSMOTE has developed throughout Greece, COSMOTE Asset Tracker offers high battery autonomy and strong coverage everywhere.

### SMART CITIES



Smart Cities Solutions allow Municipalities to offer better services to their citizens and improve their everyday life, while at the same time protect the urban environment.



In the **Municipality of Monemvasia**, smart meters were installed on the municipality's water supply network for remote monitoring and management of water supply and consumption, in real time and with precision, via the COSMOTE NB-IoT network. The **Smart Water Management** solution achieves savings of water resources, stabilization of water pressure, quality control and leak detection, while significantly reducing energy consumption and municipal spending. This is the first water metering project in Greece carried out using an NB-IoT network.



A **Smart Parking** solution was implemented in the Municipality of **Chania** for People with Disabilities, utilizing the COSMOTE NB-IoT network. The project involved the installation of special sensors in existing municipal parking spots for local and visiting persons with disabilities. Using a special **mobile app**, drivers can instantly find available parking spaces and how to get to them, while with special portable cards at their disposal, they automatically validate their eligibility to use the parking space. This project, which is already being used by more than 300 eligible drivers, encourages **equal participation** for everyone – locals, visitors and tourists – in the life of the city, while also facilitating the work of the traffic police.

### ENERGY MANAGEMENT



Solutions for better energy management consumption by businesses, to reduce their operating costs and build an "environmentally responsible" profile.

- e-Energy

## 2.2 CUSTOMERS | 2.2.2 PRODUCTS AND SERVICES FOR SUSTAINABILITY

**CONNECTIVITY**  
AROUND THE GLOBE

The OTE Group's Satellite Teleport in Thermopylae was selected by leading content connectivity satellite-based solutions provider SES as a Gateway site for its O3b mPOWER system, enabling the delivery of connectivity services to underserved and under-connected regions across the globe. Leveraging its satellite infrastructure and considerable know-how, OTE Group will provide SES with integrated Gateway services for the interconnection between satellites and the ground segment, 24-hour support and management of satellite ground infrastructure under a 10-year contract.

For the needs of the project, OTE Group prepared the appropriate infrastructure in Thermopylae in record time, successfully mitigating the difficulties caused by the pandemic. SES will subsequently install satellite antennae and equipment which form the ground network-gateway to communicate with its O3b mPOWER constellation operating in the medium earth orbit. The data will be transmitted via the Gateway installation towards and from the satellites, with the data rapidly reaching the terminals of telecommunication providers across parts of the globe.

**CAMPUS**  
NETWORKS**First cellular Campus Network in Greece for Smart Manufacturing**

COSMOTE designed and deployed the **first cellular Campus Network in Greece** (a pilot project) in partnership with **Ericsson**, at **Calpak's** fully automated solar water heater production facility in Loutraki, Greece. The goal of this pioneering technological solution is to increase the factory's productivity and enhance the company's competitiveness in the global arena.

The cellular campus network provides excellent security and stability, as it utilizes licensed spectrum, thus delivering top quality, high-reliability services without interference. Also, it supports full mobility of people and machines inside and outside the factory, while it provides unmatched flexibility for any future rearrangement of the production lines. Cellular Campus networks are an innovative connectivity solution that can contribute decisively to the digital transformation of Greece's businesses, accelerating the transition to 'Industry 4.0' and smart manufacturing, as well as the digital transformation of key sectors of the economy, such as tourism, logistics, transport, infrastructure management (ports, airports), etc.

**The first 5G Campus Network in Greece for the Athens Intl. Airport**

The **5G campus network** was created by COSMOTE, for the implementation of a pilot use case for incident management and indoor or outdoor area physical security. This is the first private network in Greece with 5th generation mobile telephony infrastructure and it was based on the live COSMOTE 5G network at the airport. Utilising the 5G campus network and through special equipment installed on a "follow me"-type vehicle, high resolution video was transmitted to the airport's Air Support Operation Centre (ASOC) from areas of high operational interest or with limited access (aircraft maneuvering areas, aprons, runway systems). Thanks to the 5G infrastructure, video transmission took place in real-time, with zero delays, and secure transmission.

This demanding pilot use case is just one characteristic example of how the 5G campus network can be used. It can also ensure the uninterrupted operation of critical importance advanced applications that concern the organisation and operation of airport infrastructure, it can facilitate air transport, and it can drastically contribute to the improvement of the experience and service of customers, visitors, and businesses that are active in the airport community.



## 2.2 CUSTOMERS | 2.2.2 PRODUCTS AND SERVICES FOR SUSTAINABILITY

DIGITAL TRANSFORMATION PROJECTS  
FOR THE PUBLIC SECTOR**myHealth app: the “e-prescription” system on the mobile phone by the OTE Group for e-Government Center for Social Security**

The myHealth application, which gives citizens access to their health profile from their mobile phone, was implemented by the OTE Group in co-operation with Byte Computer. The new mobile app enables citizens to easily, quickly, safely view and manage pharmaceutical prescriptions, examination referrals and medical certificates issued via the “e-prescription” system and will soon be enriched with new medical data. The app is the next step in the multidimensional e-prescription project, which has been implemented with the input of the OTE Group.

Through the application, citizens can receive push notifications for every new prescription or examination referral issued to their Social Security Number (AMKA) and have immediate access to information on medicines they are receiving or have received, as well as doctors’ notes. At the same time a history of all prescriptions for medicines and referrals registered with the e-Prescription System since January 1st, 2012, is being provided. The app also enables parents to manage and monitor the e-prescriptions and referrals of indirectly insured family members, i.e., minors.

The goal is for the app to be constantly enriched with new features, so that it evolves into a complete “e-Health record” through which citizens can access all of their health data.

**The 5G ambulance that saves the most critical minutes**

COSMOTE presented the first 5G ambulance in Greece, in collaboration with EKAB (National Emergency Assistance Centre) and Ericsson, in a use case that demonstrated in practice how fifth-generation networks will contribute to the rapid evolution of medicine and the enhancement of Health services. The pilot implementation included remote patient examination via COSMOTE 5G by a doctor in Thessaloniki, during transportation by an EKAB ambulance located on the National and Kapodistrian University of Athens (NKUA) campus. The NKUA has an important contribution to the development of 5G infrastructure and applications and a long-time collaboration with COSMOTE on research projects.

During the pilot implementation, a simulation of transporting a patient to hospital by an EKAB ambulance, was conducted. The ambulance and the hospital were equipped with 5G equipment, which utilized the special 5GSA infrastructure, created by COSMOTE and the DT Group in collaboration with Ericsson and allows impressively low network latency. The EKAB emergency medical technician (EMT) had an ultrasound device, a tactile glove with sensors, a monitor and headphones for high-definition video and audio on board the ambulance. Wearing the glove and holding the ultrasound wand, the EMT began examining the patient during transport. The hospital doctor in Thessaloniki had at his disposal a monitor, headphones, and a special joystick controller that sent a signal to the EMT’s glove sensors. Using the controller, the doctor could direct the EMT’s hand as if he were examining the patient himself in the ambulance. Communication between the controller and the glove, the transfer of video and audio, and the ultrasound imaging took place in real time via COSMOTE 5G, in complete synchronisation, with absolutely no lag.



## 2.2 CUSTOMERS | 2.2.2 PRODUCTS AND SERVICES FOR SUSTAINABILITY

**INFORMATION SECURITY**

Services for the increasing needs of businesses' security while they are using the Internet.

- **COSMOTE Business e-Secure**
- **COSMOTE Mobile Security**
- **Mobile Device Management**
- **Anti DDos**

**DEVELOPMENT OF APPLICATIONS**

Development and improvement of applications, digital self-care functionalities and on-line services, which contribute to efficient resource management and the reduction of paper consumption.

Examples of digital functionalities and applications are **My COSMOTE App** and **My COSMOTE**, e-invoice, e-payment, online submission of telecommunication providers' requests "**Your business.gr**" and "**Check for technical issue**".

Moreover, OTE Group is moving rapidly towards meeting the demands for digital transformation. In this context, more than 60% of B2B clients are using the e-bill platform to pay their bills; an 8% increase compared to 2020. In addition, 1/3 of e-top ups are being steadily performed electronically, through the Group's channels.

**e-Tourism**

Services aimed to upgrade the operation of tourist enterprises. They are used in hotel energy management, infrastructure management and maintenance of information systems and digital signage, as value added services to guests, teleconferencing services, etc.

Among other services, **hoteliga** is offered to small hotels as an integrated solution of a Property Management System (PMS) with extended channel capabilities for all worldwide booking platforms (Booking, Airbnb, Expedia, TripAdvisor etc.) and a standalone booking engine for directly booking arrangements.

**SERVICES THAT EMPOWER DIGITAL PRESENCE AND HELP BUSINESSES GROW**

The digital era is offering numerous growth opportunities for Greek SMEs. OTE Group's vision is to support their growth and help companies transition to the new digital era. As a result, OTE Group develops services that increase productivity and cooperation as well as tools which will enable their digital transformation.

**COSMOTE Digital Marketing4U**

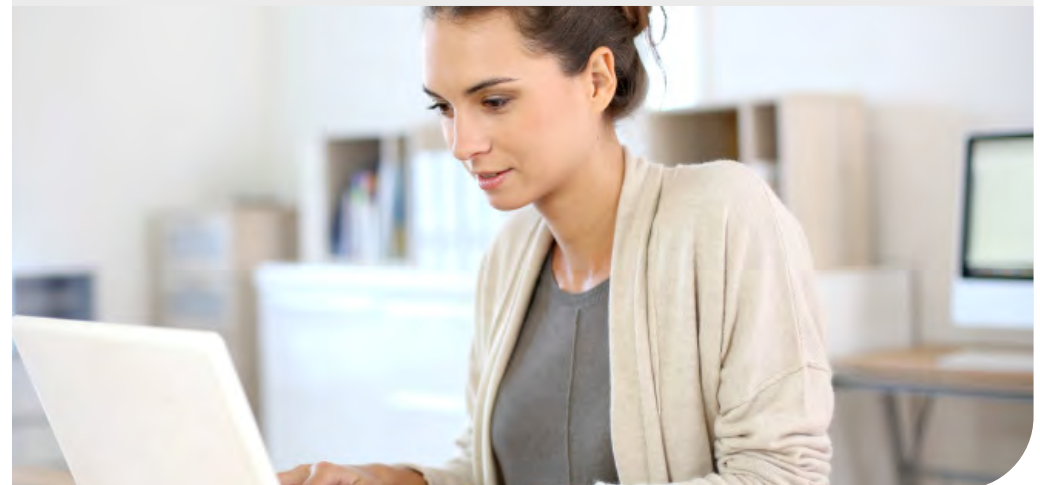
A consulting service, provided by certified digital campaign managers for the design, creation, execution and monitoring of digital campaigns on Google and Facebook platforms targeted towards Small Business Customers.

**COSMOTE New Site 4U**

A consulting service provided by experienced web designers for the design and creation of custom-made new web sites targeted to Small Business Customers.

**COSMOTE Click & Site**

A service targeted to small business offering an easy (Do It Yourself) upgrade of their digital presence from a simple professional Facebook page to a standalone web site with e-shop capabilities and live synchronization with the Facebook page.



## 2.2 CUSTOMERS | 2.2.2 PRODUCTS AND SERVICES FOR SUSTAINABILITY

## Research and Innovation

To consolidate its technological superiority, OTE Group systematically promotes research and innovation, with multiple benefits for society, customers and employees. The Group participates in research projects, finances internal activities (such as developing tools / applications / products and test infrastructures), evaluates new technologies and equipment, collaborates with educational institutions, etc.

### Innovation

OTE Group strives to deliver innovation to its customers, in order to improve people's lives and enhance the technological brand of the company.

In 2016, OTE Group created the IT Innovation Center, aiming to promote innovation in all of its business operations and activities. In the IT Innovation Center, new technologies are tested, through Proof of Concepts (POCs) in real life use cases, either using the Group's own innovation technology experts or in collaboration with startups / scaleups, research centers and universities.

The IT Innovation Center hosts OTE Group's proprietary Innovation Lab where experiments and developments of new technologies such as Artificial Intelligence (AI) and Big Data Analytics, Virtual Reality, Augmented Reality and Mixed Reality, Human and Robot Interactions are carried out. These experiments are conducted to explore their potential applications to support OTE Group business goals, such as test event driven

applications (e.g. chatbots) and progressive web applications.

OTE Group looks to create bridges between itself and the startup ecosystem of Greece and abroad. In that context, OTE Group:

- Seeks to collaborate with startups that stand out and examine possible synergies in POCs, with the aim of experimenting with new technologies in real life cases to create solutions for OTE Group internal needs and solutions for its customers. Till the end of 2021, the IT Innovation Center Team got in contact or/and reviewed over 182 startups.
- Scouts the best startups and is in constant contact with incubators / accelerators and funds that have a presence in ecosystem events or organizes events with the startup ecosystem.
- Participates in innovation competitions, having a supporting and guiding role in startup teams,

providing them a business-related insights and know-how, in order to help them develop their idea in a way that it is sustainable, efficient and attracts more future customers.

- Participates in events to showcase to the general public OTE Group's approach to new innovative technologies.
- Organizes Innovation Contests for external audiences (Teams and Startups) and internal audience (Group employees) to foster an innovation culture and mindset among its workforce.

**The Missing Alert app was generated** at COSMOTE's 1st Internal Hackathon. The app's purpose focuses on the recovery of missing children and adults by a group of young employees who also had a missing case in their family. The Missing Alert app, a mobile application



designed and developed by COSMOTE for the NGO "The Smile of the Child", was launched in 2020. The innovative mobile app is added to the tools available to "The Smile of the Child" and other institutional competent bodies, to prevent and manage cases involving missing people. The app is managed by the NGO's specialized team, which is responsible for any information regarding missing persons, enabling them to make the most of the potential for the immediate identification of the person being sought.

## MAIN VALUES



**ENVISION**  
THE FUTURE  
AND CREATE IT



SEE **CHANGE AS AN OPPORTUNITY**  
AND NOT AS A THREAT



CONTINUE  
**OVERCOMING**  
OBSTACLES



**DISCOVER NEW IDEAS** THAT WILL  
SIMPLIFY PEOPLES' DAILY LIVES AND  
WILL CREATE **A BETTER WORLD FOR ALL**

## 2.2 CUSTOMERS | 2.2.2 PRODUCTS AND SERVICES FOR SUSTAINABILITY

**Research & Development (R&D)**

In 2009, OTE Group created the R&D to consolidate technology superiority. Since then, a dedicated specialized team has been actively participating in R&D funded projects which aim at the design and deployment of advanced infrastructures and the demonstration of innovative solutions and services. Through this activity, OTE Group:

- Contributes to the shaping and assessment of next generation technologies in multiple domains (5G/6G, IoT, ITS/C-ITS/CCAM, smart energy, smart city, m/e-health, cloud computing, critical infrastructures, federated testbeds, network performance, security and privacy, quantum computing, etc.), while acquiring knowhow and expertise from the early stages of the new technologies.
- Proactively identifies new business opportunities (vertical markets, adaptation of business processes, collaboration with new/existing market players, exploitation of project results, etc.) and creates potential for offering innovative products and adopting emerging technology approaches.

- Finances internal activities tailored to the company's internal needs and/or the research projects' needs, including developing tools / solutions / applications (network performance tools, energy monitoring/management, automations, physical security solutions, NB-IoT modules/apps, etc.) and test/lab infrastructures of (beyond) state-of-the-art technologies (NSA/SA 5G network testbed, Cloud infrastructure, IoT platform, FTTH lab).

- Collaborates with educational institutions in Greece and Europe with mutual benefits (knowledge exchange, common trials, shared infrastructures, etc.

- Remains at the forefront of the technological evolution while strengthening its innovative profile and brand name.

- Impacts on its digitalization transformation and business sustainability.

For its participation in research and innovation projects, the Group receives external funding (by the EC) and each year secures additional funding for the next 3 years (without considering new projects to come).

2009-2021

PARTICIPATION IN

&gt;90

RESEARCH PROGRAMMES

COOPERATION WITH

&gt;800

PARTNERS / ORGANIZATIONS SUCH AS ENTERPRISES, UNIVERSITY AND RESEARCH CENTERS IN GREECE AND OTHER EUROPEAN COUNTRIES



PARTICIPATION IN

37

research projects in total co-funded by the European Commission, regarding programs/initiatives, like the Horizon 2020 Research Program and 5G-PPP (5G Infrastructure Public Private Partnership).

29

EU funded 5G-PPP research projects and 5 Marie Curie projects; thus, contributing actively to shaping and evaluation of future 5G technologies, infrastructures and services and novel business models in various vertical markets.

34

research projects aim at Sustainable Development with benefits to society and the environment.

The following projects focus on the protection of the environment with continuous reduction of energy consumption: SMART5GRID, DAEMON, Int5Gent, 5G-PHOS, 5G-EVE, 5GENESIS, 5G-MOBIX, 5G-DRIVE, 5G-VICTORI, TESTBED 2, InterConnect.

In addition, the projects below refer to innovative applications with benefits to society (transportation – public transport, air-quality, public safety, privacy protection, health – health care, nutrition, technology etc): All 5G-PPP projects, BigQ, RESISTO, UNIQORN, CyberTrust, LIFE - SAFE CROSSING, C-ROADS Greece, AEOLUS



More detailed information about the EU projects that OTE Group has participated in can be found on the [Group's webpage](#).



## 2.2.3 Safe and Responsible Use of Technology

### Safe Use of the Internet

The Group has developed programs and actions to provide information and raise awareness about the safe use of the Internet by children.

#### Products and services for safe use

A wide range of products and services specifically designed for a more controlled and safe use by minors.

#### **COSMOTE Family solutions:**

A series of products and services for parents to facilitate the safe navigation of their children in the digital world.

- **COSMOTE Mobile Family rate plans:** In 2021 COSMOTE continue to offer an even more affordable mobile solution for families. With the new COSMOTE Family GIGAMAX series all family members benefit from unlimited voice communication to all Greek Mobile and Fixed networks and large data bundle sharing ranging from 10GBs to Unlimited Data. Along with new family services that allow family's cost control and member control for mobile communication, COSMOTE Family GIGAMAX rate plans are a trustworthy and affordable solution for all Greek families.
- **COSMOTE Family Safety application:** An advanced parental control application that enables the safe navigation of children on the Internet and on social media. COSMOTE Family Safety application allows parents to monitor the time children spend online and on which



activities, control which mobile applications their children can use and the time they spend on each, apply Web Filtering restricting children to only visit certain website categories, activate anti-cyberbullying alert if their child has been verbally abused or spoken bad on social media, set time limits, activate Geo Location. Parents can manage their children's activity in all type of devices (mobile, tablet, laptop, PC) through their device.

- **COSMOTE Total Security:** This service focuses on the protection of the user's computer, smartphone and tablet. It includes Anti-Virus, Anti-Spam, Firewall, Banking Protection, Browsing Protection, and Parental Controls, which provide safety while surfing the Internet. It can be accessed regardless of whether the user is

connected to the Internet or not. Also, it offers browsing protection to smartphones when surfing online via Wi-Fi or on COSMOTE's network and secures phones against malware, viruses, and phishing attempts. Personal data cannot be hacked, and online purchases and transactions can be carried out safely.

**Parental Control Services from COSMOTE TV,** for Satellite and Streaming service subscribers. With these services, subscribers can set their preferred parental control level and restrict access to specific programs based on the degree of suitability. Additionally, subscribers can restrict access to the Television channels of their choice.

#### Informing and educating the public

##### **Informative Meetings for Safe Internet Navigation at the OTE Group Telecommunications Museum:**

Since 2010, educational programs have been carried out for the safe use of the Internet at the OTE Group Telecommunications Museum.

In the period September 2020 - August 2021, an educational program for the safe internet browsing was offered on demand for primary and secondary school students.

#### Collaboration with recognized bodies

- **The Smile of the Child:** COSMOTE and GERMANOS supported, the 1st Information Education and Technology Mobile Laboratory in



## 2.2 CUSTOMERS | 2.2.3 SAFE AND RESPONSIBLE USE OF TECHNOLOGY

Greece, "ODYSSEAS", which is an initiative introduced by the organization "The Smile of the Child" and operates under the auspices of the Ministry of Education, Research and Religious Affairs. The main goal of this initiative is for students, parents and teachers to be informed about major issues, such as the safe use of the internet. In 2021, the social-distancing due to the COVID-19 pandemic imposed a temporary postponement on in-person educational activities. At the same time, the critical shortages in blood reserves of the National Health System brought to surface the need for more intense blood donations. Right from the outbreak of the pandemic "The Smile of the Child" joined forces with the institutions and the competent bodies and made "ODYSSEAS" available to the Public Health System, by preparing the vehicle appropriately to host blood donations adhering to all prescribed Covid-19 health protocols, as defined by the National Blood Donation Center (EKEA), with extra caution to ensure smooth and safe conduct. In 2021, "ODYSSEAS" hosted 27 blood donation actions on a nationwide scale and

collected 1.067 blood units in support of the Public Health System.

- **Notice and Take Down (NTD) process:** NTD is a process that is operated by the National hotline Organization (ORAdE.NET), Law Enforcement agencies, Network Operators and Service Providers. Telekom Romania's NTD process is linked with ORAdE.NET. More specifically, the process involves the collection and assessment of reports that refer to illegal or harmful internet material for children. For all relevant complaints received through the different company channels, the respective Telekom Romania divisions follow the NTD procedure. The issuer of the complaint is then redirected to the OradeNet.

### Participation in self-regulatory initiatives

OTE Group participated in the **"ICT Coalition for the Safer Use of Connected Devices and Online Services by Children and Young People in the EU"** through Deutsche Telekom.



### Mobile Phone and Road Safety

COSMOTE, in the context of its commitment to contribute to people's safety, supports actions to inform the public and raise awareness about the responsible use of mobile phones while driving.

COSMOTE is a member of the Road Safety Institute "Panos Mylonas" and its alliance on Safety and Culture on the Road "Roads in the Future". Also, for yet another year, COSMOTE supported the "Iaveris" School of Road Behavior, enhancing its awareness actions on road behavior.



## 2.2.4 Communication with Customers

### Responsible Marketing

OTE Group conforms to the applicable laws and regulations regarding communication and advertising.

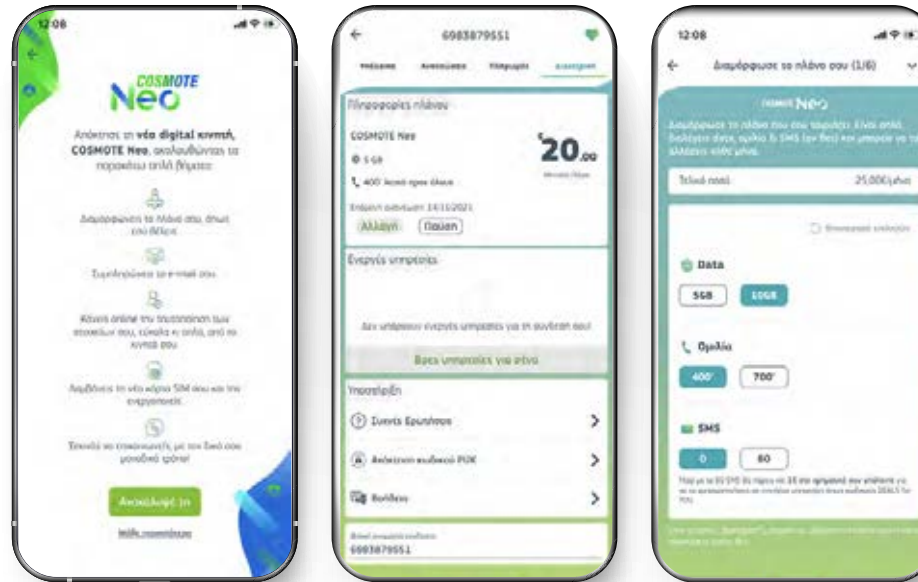
All promotional materials prior to their release are reviewed in order to ensure that they abide with applicable laws and are suitable, impartial, genuine and respect diversity.

In Greece, companies follow the Code of Responsible Marketing by the Committee of Communication Control (CCC). They implement the Greek Code of Conduct for advertising and communication, in line with the CCC guidelines

In 2021, regarding non-compliance with the Code, the CCC issued, at first and appellate level, **0 decisions involving OTE and 2 involving COSMOTE**, and minor amendments to the advertising messages were required.

In addition, no financial penalties were imposed for responsible marketing and unfair commercial practices by the Greek General Secretariat for Consumers.

In Romania, the company follows the Romanian Advertising Council (RAC) Code of Conduct for advertising and communication. In 2021, RAC issued 1 complaint for advertising campaigns, where the Code's instructions were not adhered. RAC suggested Telekom Romania Mobile Communications to review the campaigns' communication content and modify it in line with the Code.



### Customers' Rights

Customer Service is accessible via phone, application platforms, e-mail or social media as well as through the retail network. Information is available on the service contract and general terms are provided in printed form or they are sent to customers via e-mail. Additionally, through the companies' official websites, existing and prospect customers can be informed about the Terms of Use of all services and about their rights, at any point in time. Each page, for each service, contains, among others, the application forms, as well as the terms and conditions.

### Transparency in Pricing

OTE Group, in accordance with the current regulatory framework, is committed to address its pricing issues in a concise, simple and transparent manner, as well as to provide a high level of service to its customers.

In Greece, OTE's product pricing and / or services are regulated by the Hellenic Telecommunications and Post Commission. In Romania, Telekom Romania's product pricing and / or services are regulated by the National Authority for Management and Regulation in Communications (ANCOM).

The transparency of pricing policies includes the disclosure of billing information within the set timeframes defined by the regulatory framework. Pricing information is available on the webpages of the companies, through their customer service centers and brochures.

Customers are also informed about billing details and any abrupt changes through their accounts. Moreover, the various solutions, in view of the current economic conditions, provide cost control, as a response to the increased customer needs for spending regulation. In order to meet its customers' needs, OTE Group has:

- Developed apps to enable better account handling. The apps inform customers through messages and provide detailed description of their bills.
- Provided cost control services to enable customers to manage their funds and expenditures.
- Developed numerous services (e.g. Multimedia Information Service (MIS) Billing Update, COSMOTE Mobile Split Bill etc.) to prevent its customers from being overcharged.
- Introduced an innovative e-bill that is simple, comprehensive, and easy to use. The e-bill platform makes use of new technologies, offering customers greater transparency and better understanding of bill charges.

2.2 CUSTOMERS | 2.2.4 COMMUNICATION WITH CUSTOMERS

**Safe, Branded Customer Products**

Particular importance is placed upon the supply of safety products that comply with the applicable Directives and Regulations. It does not distribute products or services to the market that are subject to prohibitions actions.

The equipment that is sold in the Group's retail stores, carries the statutory CE labeling (mandatory in the EU) and complies with national and the applicable EU regulations (in Greece and Romania), such as the Presidential Decree 98/2017 (harmonization of Greek legislation to the Radio Equipment Directive 2014/53/EU (RED) – in Greece, the Waste Electrical and Electronic Equipment (WEEE) Directive 2012/19/EU, the Restriction of Hazardous Substances (RoHS) Directive 2011/65/EU, the Delegated Regulation (EU) 2021/340 of 17 December 2020 regarding the energy labelling of electronic displays, the EU packaging and packaging waste legislation Directive 94/62/EC . In addition, COSMOTE equipment for ADSL / VDSL and TV services complies with the eco-design requirements of Directive 2009/125/EC (Ecodesign). Apart from CE labeling, the compliance of the device with the European Regulations is also declared with the EU



declaration of conformity. The device must be accompanied by a copy of the declaration or by a simplified declaration which will include the internet link where the full text can be obtained.

Mobile phones comply with the International Commission on Non-Ionizing Radiation Protection

(ICNIRP) regulations and EU Recommendation 1999/519/EC on the restraint of public exposure to electromagnetic fields (0 Hz to 300 GHz).

For mobile telephony devices, OTE Group requests from its suppliers Specific Absorption Rate (SAR) data. The data are available to its customers

inside product packages and upon request at the Group's retail network.

The equipment is also checked for the efficient use of the spectrum allocated to terrestrial radio communications and for the avoidance of harmful interferences, in accordance with the RED and Directives 2014/30 / EU (EMC) and 2014/35 / EU (LVD) for fixed telephony terminal equipment.

The products include a detailed installation manual in their packaging or provide a web link to easily download the user guide and the manual of the device. Manuals, for the safe use and installation of COSMOTE and Telekom Romania's equipment, are also made available on COSMOTE's and Telekom Romania's websites.

Suppliers are obligated to attach the required certification of their products and pay compensation for any damages, due to non-compliance with European and national legislation.

In 2021, no financial penalties were imposed in 2021 for OTE and COSMOTE for a non-compliance case for any of the above issues.

## 2.2.5 Customer Service and Satisfaction



### WHY IT MATTERS

## COSMOTE IN 2021 RETAINED ITS STRATEGY FOR SUPERIOR CUSTOMER EXPERIENCE

across customer journeys and channels, while emphasizing in digital experience, an imperative need due to COVID-19 environment and internet increased needs.

Mobile application users grew by 14% on annual basis while maintaining a high satisfaction rating in the Android and Apple stores of 4,5 stars. COSMOTE customers enjoy more selfcare capabilities such as easy access to their bills and e-payment, activating mobile connections, managing fixed services' quality issues and controlling their usage, managing their data privacy permissions, renewing and upgrading their tariff plans and other. COSMOTE App and COSMOTE website transactions increased

compared to 2020 with total bill e-payments growing by 29%, and e-sales transactions by 74%, indicating a growing consumer trust and willingness to use COSMOTE digital channels for self-service.

Particular attention was paid to rewarding and staying by customers in time of need. Throughout 2021 multiple reward initiatives took place, offering customers free mobile voice minutes, data and TV day passes via COSMOTE and What's Up applications or automatically. Moreover,

COSMOTE offered free mobile data and voice bundles to 1,1m customers affected by natural disasters such as earthquakes, floods and wildfires aiming to facilitate people's connectivity and support them during difficult times.

COSMOTE operates with a customer-centric approach, striving to make our customers' lives better. In 2021, COSMOTE's competent teams

provided a best-in-class usage experience with high quality products and transparent pricing, while quickly responding to customer needs and supporting them with their inquiries.

- In 2021 COSMOTE redesigned and improved its "Voice of the Customer Program" with the introduction of a new survey platform that captures customer feedback not only after

## 2.2 CUSTOMERS | 2.2.5 CUSTOMER SERVICE AND SATISFACTION

transactions and journeys, but also in regard to relationship and product experience. In addition to Satisfaction and effort scores, NPS (Net Promoter Score) became the common KPI across surveys, while bringing customer comments to employees' attention empowered customers' voice. Improvement actions addressed to **customer journeys** management helped to increase customer satisfaction from their journey experience and reduce their effort.

- **Customer Experience Ambassadors** continued to actively participate in the product development process, though COVID 19 pandemic, effectively representing customers. With 918 participations in friendly user tests and design workshops, COSMOTE's talented employees contributed to product experience excellence. The success of this culture transformation Program is reflected in Program's high NPS of 77 points.
- The **"COSMOTE DEALS for YOU"** program, which includes a platform that lists exclusive privileges and offers for third party leading brands to COSMOTE customers, contributed significantly to the increase of customer loyalty and satisfaction. In 2021, COSMOTE increased the number of partnerships at COSMOTE DEALS for YOU program, as well as the respective benefits for COSMOTE customers. In addition, it provided customers with relevant online offers and solutions during lock-down periods.
- **Gesture communication gifts** as well as **recovery communication gifts** were provided to Group customers in 2021, via campaigns My COSMOTE app or front-line representatives. Through this initiative, OTE Group aims to

facilitate customers' needs for constant communication and reward their loyalty. **DATA ME NOW**, a customer-driven self-care gift, was highly used via My COSMOTE App at the times that customers needed unlimited GB. Being proactively relevant and helping customers to recover from a difficult situation, results in enhancing customer's feeling of being in good hands.

### Handling of Complaints and Requests

Driven by the Group's commitment to challenge the way it works and strive in the direction of improving the experience it provides to its customers, the Group achieved the re-organization of its complaint management structure. The Group's purpose was to eliminate the multiple levels of requests handling, thus aiming to reduce the end-to-end (e2e) management of complaints to the shortest possible time. Accordingly, customer complaints are assigned and e2e handled solely by the Customer Care Front-line. This decision demanded the additional empowerment of Front-line people with the necessary tools and skills.

Additionally, in the new digital age, customer requirements are constantly changing, creating the need for a faster, easier, simpler and above all more personal service.

Embracing this new era, with **#asto\_pano\_mou** as our moto, the Group sets as its absolute priority to offer an effortless experience (Zero Effort) to customer requests on both physical and digital channels (Omni-Channel Customer Experience). Understanding different customer needs, the Group responded with flexibility and insight and offered



high quality service, in order to make everyday life better, by providing solutions at first contact (FCR- First Contact Resolution) and when these were insufficient, by monitoring requests and confirming their resolution with responsibility and consistency, thus assuring fewer complaints and excited and loyal customers.

In 2021, COSMOTE customer service efficiently handled customer inquiries related to fixed, mobile and TV services. Indicatively:

- The unique ticketing system, **ONE Ticket**, enables customers to submit and handle all possible requests. ONE Ticket applies to both technical support inquiries and commercial support requests.

ONE Ticket is installed in all customer service channels: i.e. call centers, MyCOSMOTE App and shops ensuring commonality of information and transparency across touch points and functions. As a result, ONE Ticket contributed to the improvement of customer experience by enabling a unified and omni-channel customer experience.

- **Live chat** via portal and mobile app for instant and interactive communication.
- **Live e-store**: A new digital channel that combines live video streaming, chat and voice which helps increase digital sales and the quality of online leads.



2.2 CUSTOMERS | 2.2.5 CUSTOMER SERVICE AND SATISFACTION

- **Video call in sign language via portal:** The customer service team personalizes its contacts through video call functionality for customers that need assistance via sign language. Moreover, it allows people with hearing disabilities gain greater autonomy regarding their personal transactions.
- **COSMOTE@YourService:** COSMOTE@YourService is an additional level of technical support. Customer service experts and certified partners provide solutions to all household and business needs either remotely or on customers' premises. The services' portfolio of COSMOTE@YourService is growing continuously in order to provide state-of-the-art support. Indicatively, COSMOTE@YourService offers improved internet connectivity solutions, mesh networks and smart home solutions.
- **COSMOTE UFixIt:** Customer service experts resolve issues by obtaining access to the customers' camera and guide end users step-by-step through problem resolution and do-it-yourself installations.
- **Team of experts,** who work to cover every need that customers have by providing instant, complete, and unified customer service. Their mission is to serve all demanding issues in one contact, providing flexibility and exceptional experience to the customers (both internal and external).
- **Social media,** dedicated team that manages all customer comments that are posted on Group of Companies' Social Media pages (Facebook, twitter, Instagram, LinkedIn etc.)

**GREECE**  
HIGHLIGHTS 2021



**ASR (Automated Speech Recognition)**

Merged the OTE-COSMOTE Customer Care Interactive voice response (IVR) applications into a unified voice application using a conversational AI self-service solution. The new application includes everything that is required to address the companies' omni-channel Customer Experience (CX) strategy, demonstrating significant cost-savings and improved CX across voice and digital channels. In 2021, more than 25 self-service cases have been recorded.

**AI Chatbox**

Introduced a digital assistant application that conducts online conversation via free text chat with the Group's customers. It was designed to convincingly simulate the way a human would behave as a conversational partner, educating customers to use the features of My COSMOTE App and webpage. In 2021, more than 100 self-service cases have been recorded (instructions, deep links etc.)

**RVM (Resolution Verification Mechanism)**

Introduced a monitoring mechanism for the performance of a landline as soon as Fault Resolution has been completed in order to

detect any irregularities and triggers proactive and preemptive actions.

**YouTube**

Provided meaningful, effective and easy-to-understand guidance to customers through YouTube videos, which looked to address customers' needs and resolve their inquiries. In 2021, COSMOTE's Hints & Tips playlist achieved more than 1,060,000 views.

**F2R@App**

Enriched the self-care capabilities in the end2end fault management and technical support process; indicatively: individual fault checks, Wi-Fi management, fault resolution status etc. The development of self-care capabilities is one of the cornerstones in the Fault-to-repair program.

**Digital On Boarding**

Enabled customers to submit a wide range of requests as well as orders, via an instant paperless process, through their smartphone. All necessary actions for a sales transaction (customer identification, sign of supporting documents and contracts) took place online through this feature, thus offering an integrated and full-digital experience.

**ROMANIA**  
HIGHLIGHTS 2021



In order for more and more Romanians to be able to enjoy unlimited internet, unlimited national minutes and SMS and a quality-price ratio that will satisfy them, Telekom Romania announced the commercial offers dedicated to the "love season". Thus, those who ported into the company's network, starting February 8th, 2021, were able to purchase the Nelimitat M subscription with a 50% discount in the first 12 months, for which they paid only €3/month, VAT included.

Customers could have also opted for the purchase of a mobile phone in installments on the Telekom bill, without bank credit, without interest and without downpayment. They could choose, for example, between Samsung Galaxy A21s and Huawei P smart 2021, with installments of only €6/month, VAT included, available together with the Nelimitat M subscription, for which they benefited from a 50% discount in the first 12 months.



## 2.2 CUSTOMERS | 2.2.5 CUSTOMER SERVICE AND SATISFACTION

### Customer Surveys

In 2021, COSMOTE continued its focus collecting customer feedback via a wide range of customer surveys with regards to customer relationships, products and services, as well as their overall experience from contacting COSMOTE touchpoints.

In 2021 COSMOTE redesigned and improved its “Voice of the Customer Program” with the introduction of a new survey platform that captures customer feedback not only after transactions in touch points (i.e. call center, stores and technical service) and customer journeys (i.e. buy service, technical issue, pay etc), but also in regards to relationship and product experience. Along with measuring Customer Satisfaction and Effort scores, NPS became the common KPI across surveys, while bringing customer comments to employees’ attention empowered customers’ voice. Overall combining survey responses and CRM data brought improvement initiatives across customer journeys and helped to increase customer satisfaction.

Indicatively, in 2021, high scores were achieved on the **TRI\*M Loyalty Index**<sup>1</sup>, showcasing strong customer loyalty. Additionally, high scores were achieved on the question "How would you evaluate the company as to: whether the company makes me

#### 2021 CUSTOMER SURVEY RESULTS<sup>2</sup>

THE OVERALL COMPANY'S PERFORMANCE IS **EXCELLENT, VERY GOOD OR GOOD**

GREECE

85%

ROMANIA

80%

THE COMPANY MAKES YOU FEEL LIKE **YOU ARE IN GOOD HANDS**

GREECE

82%

ROMANIA

77%

feel like I am in good hands?”, since the majority of customers responded “Excellent, Very Good or Good” (-2 points compared to last year).

According to the 2021 Customer Survey Results, 85% of customers in Greece have rated the overall company's performance as Excellent, Very Good or Good. Similarly in Romania the percentage is 80%.

In regards to whether the company makes customers feel like they are in good hands, 82% of customers in Greece and 77% of customers in Romania responded Excellent, Very Good or Good.

<sup>1</sup> TRI\*M Loyalty Survey, designed at an international level, measures and monitors customer loyalty across countries with DT's presence.

<sup>2</sup> Results from TRI\*M Loyalty Survey 2021, Evaluation of overall performance and evaluation of driver feeling in good hands.



#### AWARDS 2021

**IN 2021, COSMOTE E-VALUE RECEIVED:**

#### **GOLD AWARD**

at the **Mobile Excellence Awards** in the category **Improve Customer Service and Retention** for its new “My Personal Assistant”.



SOCIETY  
**Social  
Commitment**

**€2.7m**

SOCIAL CONTRIBUTION  
IN 2021

**4.1m**

BENEFICIARIES

**2.6m**

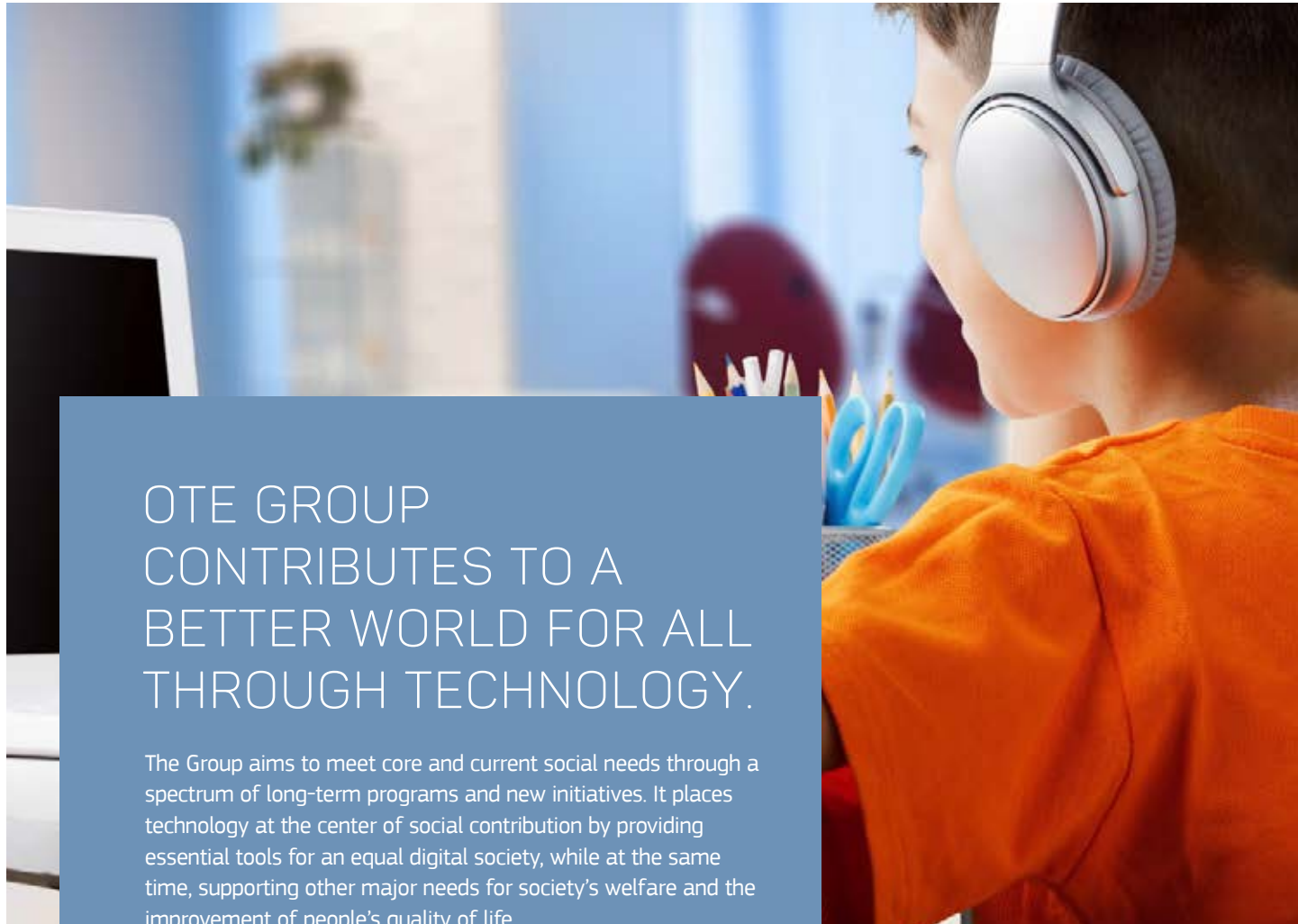
OF WHICH, FROM  
DIGITAL INCLUSION INITIATIVES

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## 2.3.1 Overall Social Contribution



OTE GROUP  
CONTRIBUTES TO A  
BETTER WORLD FOR ALL  
THROUGH TECHNOLOGY.

The Group aims to meet core and current social needs through a spectrum of long-term programs and new initiatives. It places technology at the center of social contribution by providing essential tools for an equal digital society, while at the same time, supporting other major needs for society's welfare and the improvement of people's quality of life.

SOCIAL CONTRIBUTION  
CONSISTS OF 3 AREAS



DIGITAL  
INCLUSION  
ACTIONS



SOCIAL  
INITIATIVES



CORPORATE  
VOLUNTEERING

2.3 SOCIAL COMMITMENT | 2.3.1 OVERALL SOCIAL CONTRIBUTION

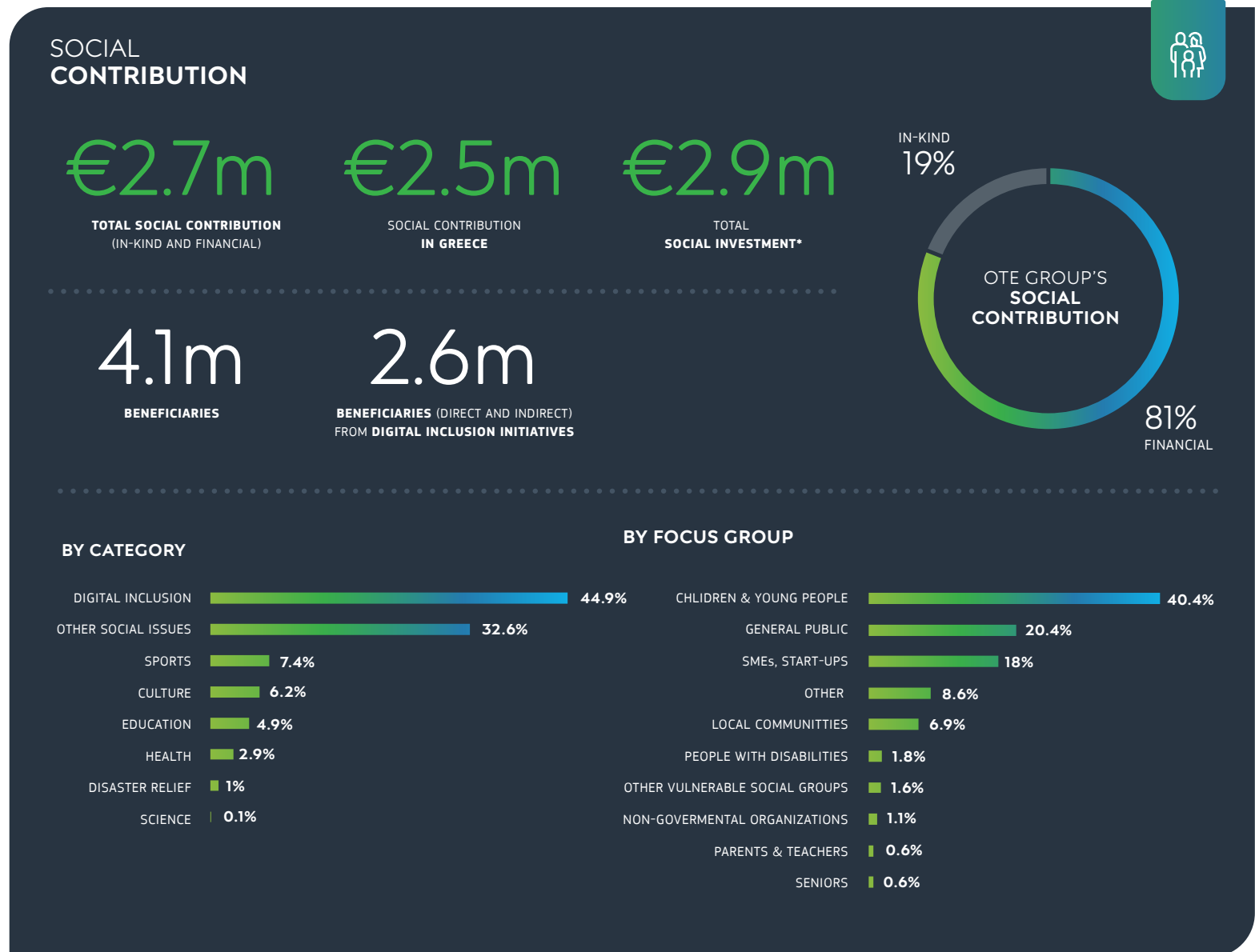
### Management and Oversight of Social Contribution programs

To achieve optimal management for all of its social programs and initiatives, OTE Group systematically develops internal mechanisms and processes. Indicatively:

- The Chairman and CEO, as well as the Senior Management, oversee the goals and strategy of the major social activities and are systematically informed about the social programs implemented.
- The Chairman and CEO approves all social sponsorships and donations, following their review and approval by the Executive Director of Compliance, Enterprise Risk Management and Insurance OTE Group (in Greece) or the Compliance Manager (in Romania)
- There is systematic dialogue with stakeholders. New social initiatives are proposed after taking into consideration the needs of interested parties, while data are collected to measure the programs' impact on society.

The evaluation of OTE Group's social contribution is based on the measurement model for inputs, outputs and impacts of the Business for Societal Impact framework (formerly known as LBG). This model is in line and compatible with international indicators and initiatives for sustainable development, such as the Dow Jones Sustainability Index (DJSI), the guidelines of the Global Reporting Initiative guidelines (GRI) and the Social Return on Investment methodology (SROI) for measuring social return on investment.

It is a continuous goal of OTE Group to quantify, where possible, the results of these programs in order to evaluate and review its social contribution for the future.



\* Including the cost for the implementation of actions and voluntary participation of employees.



## 2.3.2 Digital Inclusion for All



THE GROUP EMBRACES  
THE SHIFT TOWARDS AN  
EQUAL DIGITAL SOCIETY.

a society that adopts and integrates information and communication technologies, while making the most out of the endless possibilities that technology has to offer.

OTE Group aims to make technology accessible to all, promote digital inclusion and grant equal access to the opportunities of the digital era. Offering technological capabilities to all, overcoming inequalities and obstacles, so that everyone can benefit from today's opportunities and build a better and sustainable future is a top priority.

The Group is committed to enabling digital inclusion for all, by providing digital skills and means, while promoting the responsible use of technology. More specifically, the Group's threefold approach on society's digital inclusion, consists of:

- **Ability:** development and promotion of digital skills, while ensuring the safe and responsible use of the technological means.
- **Access:** free provision of essential ICT infrastructure, products, and services.
- **Affordability:** make ICT services affordable, through specialized tariffs and discounts addressed to specific social groups.

In this direction, the Group designs and implements initiatives addressed to people of all ages and socio-economic backgrounds, envisioning to impact ~15m. peoples' lives through digital inclusion initiatives by 2024.

### Educational Robotics and STEM

COSMOTE is one of the first companies to systematically invest in the dissemination of educational robotics and STEM (Science,

Technology, Engineering, Mathematics) educational methodology in Greek schools, over the past 7 years. The company has implemented a series of actions, in partnership with the not-for-profit organization for educational robotics and science "WRO Hellas", contributing to the development of digital skills of over **170,000** children & teachers.

### Highlights and Initiatives:

- **National Educational Robotics Competition for kindergarten, primary, junior high and high school students.** Despite the year's challenges, more than 500 teams of students registered to participate in the 2021 National Educational Robotics Competition. Under the theme "The 21st century: People, networks, artificial intelligence" they presented innovative ideas and various robotic solutions in the different categories during the finals, which were viewed by 5,000 people through online streaming.

In the last 7 years there have been more than 25,000 student's participations in the competitions.

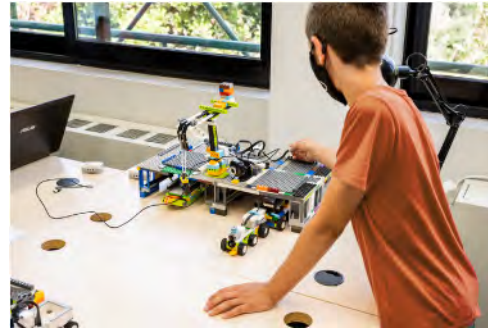
- **Train-the-trainers sessions:** Specialized train the trainers sessions and webinars have been realized, in the framework of the National Educational Robotics competitions, aiming to disseminate educational robotics and STEM in schools all over the country. Moreover, educational material on programming and educational robotics are available online for teachers and students. In the last 7 years, more than 7,000 teachers have been trained and the educational material have had more than 4,000 downloads.



## 2.3 SOCIAL COMMITMENT | 2.3.2 DIGITAL INCLUSION FOR ALL

- **Equipment and Educational materials:**

COSMOTE provides schools with educational robotics packages and supports the development and distribution of educational materials by WRO Hellas. COSMOTE, in the last 7 years, has provided approximately 600 educational robotics kits to schools in Greece and there have been 4,000 downloads of specialised educational materials in robotics and programming for teachers and children.



- **Junior Engineer Academy (JEA) in Greece:**

JEA is an educational program organized by the Deutsche Telecom Foundation, established in the Greek Educational System in collaboration with COSMOTE's strategic partner STEM Education. 16 Junior High Schools were selected which had specific equipment installed and teachers were trained accordingly, in order to deliver engineering-focused lessons to students. In 2020, 640 children from 16 junior high schools were trained in the framework of JEA. Due to COVID-19, the program will be completed in 2022, with the participation of 1,500 junior high school students in Greece for the improvement of their skills in subjects such as engineering, physics, and mathematics.

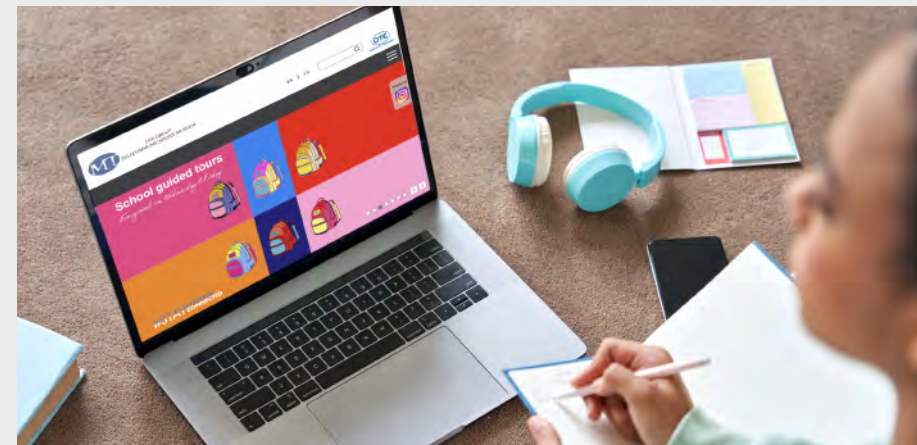
programs. 344 people participated in the aforementioned programs.

- **Movies for educational robotics and STEM:** The first fictional movie "ROBOGIRL", and the first documentary on educational robotics "THE REAL ROBOKIDS" in Greece were created by COSMOTE. In 2021, the documentary "The Real Robokids" won a Silver Lion at Cannes Lions 2020/2021 in the 'Non-fiction Film Over 30 minutes' category of the Entertainment Lions. The movies, with over 7m views, are available in COSMOTE's YouTube channel.

- **STEM training sessions @ OTE Group museum:**

The museum conducts STEM educational workshops for school groups (all grades of elementary and junior high school) and for children 6 to 12 years old. In 2021, due to COVID-19, it conducted online and in house STEM training programs for programming and coding, addressed to children 6 - to 12 years old, with the use of Scratch Junior and Scratch 3.0

## EDUCATIONAL PROGRAMS AND DIGITAL EXPERIENCE IN THE OTE GROUP TELECOMMUNICATIONS MUSEUM



### 11th consecutive year of Educational programs

The Museum in 2021 offered mostly digital educational programs due to the conditions of the pandemic covid-19. The programs for school groups included online **guided tours, robotics, STEM programs, and recorded videos with information about safety on the internet**. It was the first time that the Museum held online art workshops addressed to the remote primary schools of Greece focused on the important topics of recycling and environmental protection. For **families**, the Museum offered **outdoor art workshops, live activities, STEM programs and guided tours** at the Museum's permanent exhibition hall using new digital applications (audiovisual material, Augmented and Virtual Reality). In addition, **videos on demand with activities** that visitors can download and watch wherever they choose were available at the Museum's web site.

In 2021, **5,552 people** participated in the Museum's educational programs and guided tours **digitally** and **in-house** at the Museum premises, and **105 educational programs** carried out in total for schools, families, individuals and other groups.

## #GrowYourBusiness

COSMOTE values a world where all businesses will be able to grow by utilizing technology's potential and supports the growth of small and medium – sized businesses in the digital era through the #GrowYourBusiness program, with various actions and initiatives.

Since 2017, #GrowYourBusiness initiative has been very popular in the business community, attracting thousands of participants/professionals from different business sectors and cities throughout Greece to participate in daily seminars and workshops. The goal of the first two cycles was to learn about the use of new digital tools and technologies, share new ideas and practical tips and to be inspired to take the next step for their business.

In 2021, COSMOTE transferred #GrowYourBusiness to the digital environment, enabling everyone to access at their own pace, via their pc or smartphone the 3rd cycle of the initiative and attend the free online seminar series #GrowYourBusiness - The Digital Sessions.

The seminars were hosted on COSMOTE's YouTube channel, aimed at helping participants become acquainted with the tools and tactics that will help them grow, through the use of technology.

At the same time, each online seminar was followed by a Live "Q&As" where participants had the opportunity to meet with experts in areas related to each topic, who answered their questions and guided them with practical advice. During this 3rd cycle of the initiative, four digital online seminars were uploaded to the COSMOTE YouTube channel:

- Digital Presence
- Digital Marketing
- E-Commerce
- Remote Collaboration

**More than 54,000 businesses and employees were able to develop new skills** in the use of new digital tools and technologies, highlighting its strong uptake from the business community. Last but not least, in collaboration with ANT1 TV station, during the channel's nightly news broadcast, COSMOTE small and medium-sized businesses clients describe their own success stories and point out how much specific digital tools and technologies have contributed to their business development.



## 2.3 SOCIAL COMMITMENT | 2.3.2 DIGITAL INCLUSION FOR ALL

### DIGITALIZATION OF THE “SAFE TOUCHES” PROGRAM BY THE NGO ELIZA



“Safe Touches”, implemented by the NGO ELIZA, is an innovative program with a nationwide impact for the prevention of sexual abuse of children between the ages of 5-9. COSMOTE supported the digitalization of the program, which resulted in the creation of a digital platform that includes all the educational materials. Through this platform all teachers in Greece, can be trained in it and then educate their students. The digital program has 3 main pillars: the program “Safe Touches” for first, second and third grade of primary school students, the educational video for teachers, and the informative video for parents.

### TELEKOM ROMANIA SCHOLARSHIPS



Telekom Mobile supports and encourages young people in education through the social responsibility program “Telekom Scholarships”. Since the scholarships were launched in 2010, over 2,500 students with notable performances have entered the competition, and 125 of them have benefited from scholarships conferred by Telekom. The company offered more than €440,000 in financial support to the winners of the eleven editions of the program. Please refer to the Internet for more information about the “Telekom Scholarships” program [www.burseletelekom.ro](http://www.burseletelekom.ro).

The company offered scholarships to the ten winners of the eleventh edition of the social responsibility program “Telekom Scholarships”. Ten students received a monthly scholarship worth 2,230 lei between January-June and October-December in 2021. They had achieved exceptional academic results in key subjects and they stood out by virtue of their extracurricular projects and volunteering activities.

### CODER DOJO IN ROMANIA



**Coder Dojo** is an international movement, launched in Ireland in 2011, which main goal is to create an informal space for kids who are interested in discovering the world of programming, through regular sessions outside school. At CoderDojo, children learn to code, develop websites, applications, programs, games, and much more. The specialists trained like this will be able to integrate more easily in the labor market, while at the same time responding to the growing demand for labor in the field of IT services. CoderDojo Bucharest, supported by Telekom Romania and Telekom Romania Foundation, is one of the first CoderDojo concepts organized in Romania.

In the 2020–2021 school year, more than 300 children aged between 8 and 17 learned about programming during the CoderDojo workshops. They are free of charge and now run online due to the restrictions of the COVID-19 pandemic. The students were able to choose one of three categories: “**Explorer**”, “**Adventurer**” and “**Master**”, depending on their age and level of education. Based on the level of difficulty a series of workshops with different programming languages and technologies was offered. Due to the great demand for introductory workshops in Algorithmics, Java Script and Python, the organizers have expanded the capacity to accommodate more students. The curriculum has been developed by volunteer mentors, specialists in programming, robotics and the latest technologies.

## 2.3 SOCIAL COMMITMENT | 2.3.2 DIGITAL INCLUSION FOR ALL

## SPECIALIZED TELECOMMUNICATIONS PRODUCTS, SERVICES &amp; OFFERS



€913,592 discounts in fixed telephony services were given to elders and to people with disabilities, in Greece.

## People with Disabilities

8,266 people received discounts on fixed telephony and internet services, in Greece.

Mobile telephony offer is specially adjusted to the increased communication needs of people with disabilities in Romania. The offer combines plenty of usage (Mobile Data, SMS, Video call mins) and personalized customer service.

## Unemployed and Pensioners

COSMOTE, since 2010, has been supporting unemployed people and pensioners, by providing a discount on their monthly fee on their mobile telephony service.

## Students



What's Up Student offers (mobile offers, double play, mobile internet), fully cover the needs of students, with innovative and exceptionally competitive services.

## OTHER VULNERABLE GROUPS



Special discount is offered to the card phone devices of Correctional Facilities in Greece, additionally to 30,000 prepaid telephone cards with total value of >€120,000 that were donated in 2021 to Correctional Facilities' Inmates.

## DIGITAL CARE PROGRAM

COSMOTE and GERMANOS actively supported the "Digital Care" program, which offered a €200 subsidy to pupils and university students for the purchase of a Tablet or Laptop, with the aim of contributing to the strengthening of the digital skills of young people and at the same time to the digital transformation of the educational process. Additionally, beneficiaries who purchased their tablet or laptop at COSMOTE or GERMANOS also got free 12GB COSMOTE Mobile Internet for 1 year and could take advantage of the special offer on COSMOTE 4G Pocket Wi-Fi with 20% discount, including a SIM with 50GB for 6 months and simultaneous connections of up to 16 devices. The program was implemented by the Ministries of Education and Religious Affairs, Finance, Development and Investments, Labor and Social Affairs and Digital Governance in cooperation with the Information Society.

## PC DONATION PROGRAM

COSMOTE offers refurbished PCs, that have been previously used by OTE Group employees, to schools and non-profit organizations.

>729 PCs have been donated to more than 679 schools, through the "PC Donation Program" that has run for 15 years. Apart from making a social contribution, this action also contributes towards the protection of the environment, as the re-use of the computers conserves raw materials and reduces electronic waste.

## EUROPEAN EMERGENCY NUMBER 112 OPERATED BY OTE IN GREECE



3,281,042

CALLS WERE RECEIVED THROUGH THE EUROPEAN EMERGENCY NUMBER 112

of which

150,889

WERE RE-DIRECTED TO THE EMERGENCY NUMBERS 100, 199, 166, 108, 197 AND 1056



## 2.3 SOCIAL COMMITMENT | 2.3.2 DIGITAL INCLUSION FOR ALL

### FACILITATION OF COMMUNICATION IN EMERGENCY SITUATIONS



In 2021 COSMOTE continued to act fast and **facilitated customers to communicate freely and use internet, each time they needed it the most, due to critical events.** Upon fires, earthquakes and extreme weather conditions a variety of temporary initiatives were established to help customers across Greece, including:

- Activation of free calls and GB mobile internet to affected customers' mobile phones.
- Postponing the suspension of services (mobile, fixed and TV) due to unpaid bills & reconnecting any suspended services.
- Replacing damaged internet and TV equipment.

Within the year, emergency support was provided to customers who were affected by fires (Attica, Evia, Korinthos, Ahaia, Mesinia, Iliia, Arkadia, Lakonia, Fokida, Fthiotida, Rodos, Kos, Grevena, Kalavrita), earthquakes (Larisa, Tirnavos, Elassona, Farkadona, Iraklio Crete, Lasithi Crete) and extreme weather -snowfall (Attica, Evia). At the same time OTE Group's technical teams worked intensively to restore the damage caused.

### MISSING ALERT APP



Missing Alert App is a mobile application designed and developed by COSMOTE for the NGO "The Smile of the Child". The innovative mobile app has been added to the tools available both to "The Smile of the Child" and other institutional competent bodies, to prevent and manage any case involving missing people. The users of the app can contribute to the location of missing people across Greece by:

- Getting alerts on their mobile involving missing persons' cases in the area they are located each time.
- Participating in searches by sending information via chat.
- Mobilizing other volunteers in the same area via social media.

### HELP LINES



OTE Group continues to provide telecommunications infrastructure and financial support for the operation of hotlines supporting vulnerable groups, and especially children in need. Indicatively, the Group supports the operation of the following help lines:

- **SOS 1056, 'The Smile of the Child'** (24 years of support), **190,153** calls.
- **European Hotline 116000** for missing children, 'The Smile of the Child' (14 years of support), **11,028** calls.
- **European Helpline for Children 116111**, 'The Smile of the Child', **2,437** calls.
- **11525 Advice Helpline** 'Together for Children' (12 years of support), **3,117** calls.

### DIGITAL INCLUSION IN LOCAL COMMUNITIES

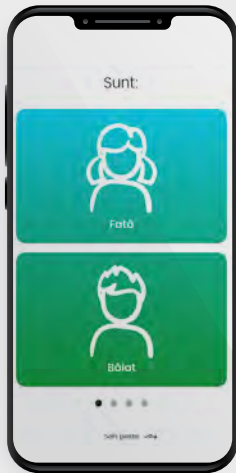
In 2021, COSMOTE supported a wide range of digital inclusion for local communities. Covered digital support, equipment, and access to our 5G network for: communities devastated by earthquakes, schools in remote areas, forests and national parks protection, cultural events, health centers in rural areas, scientific research facilities for climate change in remote islands and the specific needs for municipalities.

### TELECOMMUNICATION PRODUCTS & SERVICES PROVISION TO "THE SMILE OF THE CHILD"

OTE Group is the main telecommunication provider of the NGO "The Smile of the Child". For over a decade, it has covered all the telecommunications needs (fixed, mobile, internet TV), the operation of the "1056" Support Line, the "116000" European Emergency Line for missing children, as well as the Instant Social Intervention Centers and Daycare Homes. The support of the OTE Group contributes to the essential work of the NGO, at all stages of prevention, intervention and treatment for a child.



## 2.3 SOCIAL COMMITMENT | 2.3.2 DIGITAL INCLUSION FOR ALL

THE FIGHT AGAINST  
CYBERBULLYING

Telekom Romania and the Child's Phone Association continued the campaign against cyberbullying with messages adapted to the context of the pandemic. This project facilitates the reporting of child abuse cases, including online grooming and physical abuse. The campaign platform [www.116111.ro](http://www.116111.ro) is an educational platform that gathers useful information on how cases of child abuse can be reported, as well as ways to seek specialized counselling for such cases.

**Happy Graff** is a mobile application that works like a diary in which teenagers can record their emotions whenever they feel

the need and have access to useful tips on how to manage different situations with difficult emotional conditions. The mobile application can be accessed on phones equipped with an Android operating system and is available for free download in Google Play. The application can also be downloaded from the campaign website.

ANY HELP BEGINS  
WITH AN INITIATIVE

Learn more about how you can prevent online abuse by contacting 116 111, the European children's telephone line, managed by the Romanian Children's Phone Association. Through 116 111, you can also report digital abuse such as online harassment, exposing children to illegal content on the internet, or online exploitation of children. You can also seek free legal advice from the organization's specialists. The information can also be sent to the e-mail address: [telefonulcopilului@telefonulcopilului.ro](mailto:telefonulcopilului@telefonulcopilului.ro)

Visit [www.116111.ro](http://www.116111.ro) for relevant information about aggression / intimidation.

You can also find information on the OradeNet portal (<http://oradenet.salvaticopiii.ro/>), a portal related to a European program that promotes the use of the Internet by children and adolescents in a creative, useful and safe way in Romania.

CHILDREN'S SECURITY  
IN THE ONLINE ENVIRONMENT

Telekom Mobile ensures that through its services it offers suitable content for all age groups. In order to make access to this content as easy to manage and secure as possible, we have taken steps to ensure that the information provided by third parties is based on and in accordance with Romanian law. An important aspect to keep in mind is that, in many cases, children adapt to technology much faster than their parents. As a result, their parents need to be well-informed about services facilitated by technological advances (such as voice calls and SMS, image sharing, internet access, and social media browsing).

The need is urgent, especially since, according to statistics, the vast majority of children surf the internet unsupervised and many of them disseminate vulnerable personal data. By accepting and being aware of these threats, parents could implement technological measures and educate their children about the responsible use of technology. By accepting and being aware of these threats, parents could apply technological measures and educate their children about the responsible use of technology.

## EXECUTIVE COALITION FOR CHILDREN

Telekom Mobile is a member of the OTE Group, and the Deutsche Telekom Group is part of the "Coalition at CEO level (CEO) to make the Internet a better place for children". This self-regulatory platform was launched by the European Commission in December 2011 and aims to make the internet a safer place for children. In January 2013, Deutsche Telekom committed to a set of 25 measures to further increase the online safety of children. These apply to each company within the Deutsche Telekom Group, including Telekom Mobile.

## 2.3 SOCIAL COMMITMENT | 2.3.2 DIGITAL INCLUSION FOR ALL

**FREE WI FI**  
IN ARCHAEOLOGICAL SITES

Free WiFi is available to visitors at major archaeological sites, as a result of the partnership between COSMOTE and the Ministry of Culture and Sports for the provision of free WiFi at significant archaeological sites and museums in Greece. With the extension of the memorandum of cooperation between the two parties, the

Ministry of Culture and Sports added another five (5) sites to the initial 20 sites, included in the memorandum, which have a major cultural and historical interest to offer free WiFi to its visitors.

The additional five new sites that have been added, include:

- Archeological site of Palamidi Nayplio
- Archeological site of Mistras
- Archeological site and Museum of Eleftherna
- Archeological site and Museum of Ancient Nemea
- New Archeological Museum of Chania

COSMOTE already offers free broadband services at 17 sites of cultural interest, while continuing with the creation of infrastructure at the remaining sites, with the company's total investment exceeding €3m.

In 2021, most archeological sites and museums were closed to public and third parties due to Covid safety restrictions for several months. As such, OTE Group managed to provide

free Wi-Fi in the following archaeological sites:

- Archeological site of Dodoni
- Archeological site of Sounio
- Archeological site and Museum of Epidaurus
- Archeological site and Museum of Olympia
- Archeological site of Akrotiri (expansion of coverage)
- Archeological site of Spinalonga (expansion of coverage)

Within 2022, COSMOTE looks to expand and improve its internet coverage in the following archaeological sites:

- Archeological site and Museum of Eleftherna
- Archeological site and Museum of Ancient Nemea
- New Archeological Museum of Chania
- New Archeological Museum and Archeological site of Vergina
- Archeological site of Acropolis (expansion of coverage)
- Archeological site of Delos (expansion of coverage)

**FREE WI FI**  
IN THE NATIONAL GALLERY OF ATHENS

In addition to the Free WiFi offered by COSMOTE at the Archaeological sites, OTE Group aims to promote our country, our cultural heritage and our history through the development of new interactive and modern means of touring and presenting the exhibits. Free access to a broadband network at archeological sites and museums allows visitors to easily search for information about the monuments, to share their experience via the internet and social networks, but also for the relevant cultural institutions to develop new ways for guided tours and visitors' hospitality.

In 2021, OTE Group managed to provide free Wi-Fi access to the NATIONAL GALLERY in Athens, which reopened its doors to more than 150,000 visitors following 8 years of renovation.



## 2.3 SOCIAL COMMITMENT | 2.3.2 DIGITAL INCLUSION FOR ALL

**KEROS ISLAND:**

## TELECOMMUNICATION SUPPORT FOR ARCHAEOLOGICAL EXCAVATIONS



The excavation in Keros island is a research project conducted by the British School in Athens and carried out under the permission of the Ministry of Culture and Sports. The new excavations unearthed a multitude of imposing and heavily dense structures. The scale of these structures proved that Keros was one of the most important locations in the Aegean during the Early Bronze Age (3rd millennium BC).

Over the past few years, COSMOTE has been providing the necessary technological equipment that helped the archaeological teams at the Keros and Daskalio excavations sites cover their daily recording and documentation needs. Furthermore, COSMOTE enhanced its 4G capabilities in the

region, to provide high internet speeds and continuous connectivity to the archaeologists, capitalizing on COSMOTE's 4G network power the largest 4G network in Greece.

In 2021, COSMOTE was the premier sponsor of the Athens exhibition "Look Across: A Settlement on Keros 4,500 Years Ago" at the Athens Municipal Gallery. The exhibition comprises finds from Daskalio, an islet off the coast of Keros which, 4,500 years ago, was a promontory of the bigger island. Daskalio today is regarded as one of the most important prehistoric archaeological sites in the world, and the Athens show presents finds such as bronze tools and casts for making them, which illustrate daily life at the time.

**COSMOTE HISTORY CHANNEL**

The COSMOTE History Channel is the most popular documentary channel on the COSMOTE TV platform, promoting Greek history, culture, and civilization. **The Group's vision for the COSMOTE HISTORY Channel is to be the place for entertainment and education.**

2021 was a special year for Greece.

COSMOTE HISTORY celebrated 200 Years of the Greek Revolution with more than 11 premieres about the Greek Independence.

The channel offers:

- >150 original documentaries or documentary series (own productions and co-productions)
- >600 documentaries of prominent Greek and foreign artists

The content consists mainly of:

- Own Productions and co- productions dealing with the Greek legacy.
- Documentaries from foreign media companies and channels, like BBC, National Geographic, Arte, A&E, RAI, Deutsche Welle, TVF, etc., dedicated to Greece.
- Documentaries from cultural institutions and other Greek foundations, independent Greek producers, etc.

The channel continues to collaborate with various organizations and institutions, such as the War Museum, and the American School of Classical Studies, and the Benaki Museum for the preservation, digitization and airing of rare film archives and videos of historical value.

Moreover, following the Group's target to provide an alternative educational vehicle, COSMOTE offers the programs of the COSMOTE HISTORY Channel for free to Greece's schools.



## 2.3 SOCIAL COMMITMENT | 2.3.2 DIGITAL INCLUSION FOR ALL

**FIRST GREEN SPACE IN ROMANIA WITH SOLAR BENCHES AND FREE WIFI**

Telekom Mobile supports the first green space in Romania with solar benches and free WiFi, since 2019, this has been an area in the Bucharest Botanical Gardens where nature and technology come together. The space offers visitors the wonders of botany, along with two benches with solar panels that allow phones to be charged with USB and contact ports, together with free WiFi Internet access. This is the first facility of its kind to be installed in a green space in Romania.



The benches allow visitors to charge their phone using USB ports on the side or by direct contact, using a special surface. Anybody who wants to upload pictures from the Botanical Gardens on social networks or simply wants to be online can do this by accessing the free WiFi network provided by

Telekom Mobile (Wifi Botanica by Telekom). The benches can also be used during cloudy periods since they have the capacity to store solar energy on days when the weather is sunny. The project was developed in collaboration with Asociatia TeamWork and the Bucharest Botanical Gardens.

**TECH PREMIERE: TELEKOM ROMANIA ANNOUNCED AN APPLICATION THAT PREVENTS IDENTITY THEFT IN THE ONLINE ENVIRONMENT**

In March 2021, Telekom Romania introduced a new measure to protect customers in the digital environment and prevent fraud through identity theft, an absolute first in the Romanian telecommunications market, but also in the Deutsche Telekom Group.

This measure enables Telekom Romania to prevent one of the most widespread frauds in the internet environment. This includes subscribing to real names but using stolen photos and IDs. With the new application by Telekom, it is impossible to upload an image from the phone to the subscription form

because the photo is taken live and online. The user does not need to download any application to use this feature.

If customers want to purchase a subscription with or without a phone by accessing [telekom.ro](https://www.telekom.ro) from a cellphone, they are asked to take a selfie and a picture of their ID card. The application does not support uploading any documents. If the purchase is made from a computer, the users receive a link by text to access the online application and follow the procedure described above.

## 2.3.3 Social Initiatives

OTE Group implements and supports a spectrum of programs and actions, in order to meet society's core needs.

### SUPPORT OF ORGANIZATIONS FOR CHILDREN



~€470,000

was donated to 17 charitable organizations that provide care for children in Greece

#### 3 ORGANIZATIONS

derived from the participation of OTE Group employees in the internal voting process.

>€9M

have been offered to over 60 NGOs, over the past 21 years

### LOCAL COMMUNITIES' ACTIONS

OTE Group supported approximately

#### 88 PROGRAMS

for local communities in Greece, with the aim to improve the living conditions of inhabitants that live in the countryside and sustain the viability of the local cultural identity.

### CHILDREN'S HOSPITAL EQUIPMENT



In 2021, OTE Group along with the non-profit organization "Pediatric Trauma Care", contributed to medical equipment of 3 hospitals' children units in the Greek region.

>€570,000

have been allocated for the purchase of medical equipment, supporting 19 hospital units for children nationwide over the last 10 years, helping

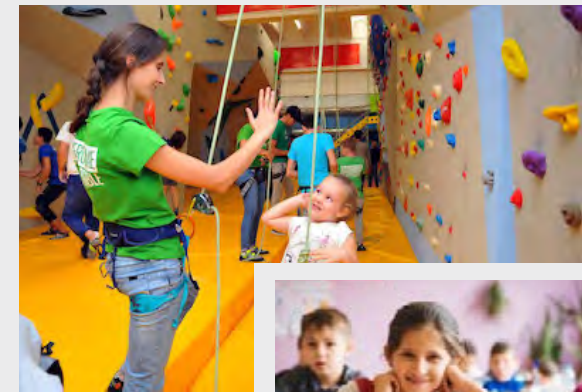
~100,000

children every year.

### TELEKOM SKATING ARENA

In 2021, Telekom Romania continued to support the Telekom Skating Arena operated by the Ion Tiriac Foundation. The company supported the only existing rink in the Bucharest Ilfov district with the aim of encouraging sports among children, young people, and support for sports teams.

### DONATIONS BY TEXT MESSAGE



Telekom Mobile helped vulnerable people by supporting Romanian NGOs in their fundraising, opening text message lines where customers can send text messages and contribute financially to various humanitarian causes. Every year, the company provides operational services for good causes and facilitates the help for thousands of people. Organizations interested in applying for a text message donation line, can access the website [www.donatie.ro](http://www.donatie.ro), which is managed by Asociatia pentru Relatii Comunitare.



## 2.3 SOCIAL COMMITMENT | 2.3.3 SOCIAL INITIATIVES

COSMOTE 2021  
SCHOLARSHIP PROGRAM

€505,000

was awarded to 30 first year university students with financial and social difficulties. Additionally, telecommunications products and services and COSMOTE TV were provided for free for all the years of their studies.

Specifically, for the academic year 2020-2021, COSMOTE offered **29 scholarships of €15,000 and €18,750**, out of which:

- 17 Scholarships of €15,000 were awarded to first-year students who will pursue a 4-year degree program.
- 12 Scholarships of €18,750 were awarded to first-year students who will pursue a 5-year degree program.

In addition, COSMOTE offered the **honorary scholarship “Zacharias Piperidis” (€25,000)** to first-year students that have been accepted into specific higher education institutions such as the School of Electrical Engineering and

Computer Engineering at the National Technical University of Athens and who are also facing economic and social difficulties.

In 2021, COSMOTE Scholarship Program for its **20 years**, gave the opportunity to 20 scholarship holders who continue to receive financial support from the Scholarship Program and have successfully completed the second year of their studies to gain experience and get to know the modern OTE Group and a dynamic work environment.

**>€7m** have been awarded to **754 university students**, in the 20 years that the program has been running.

SUPPORTING THE HELLENIC  
NATIONAL DEFENSE GENERAL STAFFCOSMOTE donated  
€185,000

to the Hellenic National Defense General Staff for the coverage of the operational needs. This initiative falls under COSMOTE's actions for supporting the work of the Greek Armed Forces, which in cooperation with the Hellenic Armed Forces and the Coast Guard protect the country's land and sea borders.

SUPPORTING THE HELLENIC  
COAST GUARDOTE Group donated  
€50,000

to the Hellenic Coast Guard for the coverage of its operational needs. Specifically, in 2021, OTE Group offered €50,000 for the repair and maintenance of the Hellenic Coast Guard's vessels. In the last 6 years, **more than €1,050,000** has been provided by OTE Group for the repair and maintenance of the Coast Guard's vessels, as well as for rescue and survival equipment such as life jackets, blankets, first-aid kits, gloves, masks, tents and isothermal suits, which are used by frontline rescuers on a daily basis and that have helped the coast guard rescue 347,512 people at sea.

## 2.3.4 Employee Volunteering

EMPLOYEE VOLUNTEERING AND PARTICIPATION IN SUSTAINABILITY INITIATIVES FORM A MAJOR PART OF THE GROUP'S OVERALL SOCIAL CONTRIBUTION.

This also offers to employees the opportunity to actively express their solidarity towards society.

>1,000

EMPLOYEE PARTICIPATIONS IN SOCIAL CONTRIBUTION INITIATIVES

>5 NGOs

FOR CHILDREN AND VULNERABLE SOCIAL GROUPS WERE SUPPORTED THROUGH EMPLOYEES' PARTICIPATIONS IN SOCIAL INITIATIVES

### ATHENS MARATHON THE AUTHENTIC



In 2021, more than 700 employees participated in the Athens Authentic Marathon - on its return after a year of absence due to the pandemic - sending the message "We run for good". The runners of COSMOTE and COSMOTE e-value gave their best, as for each kilometer they ran, the OTE Group raised money to equip 41 Primary Schools on the border islands of the Cyclades and the Dodecanese and supported 1,800 students with technological educational equipment of robotics in order to become familiar with computer science, coding, and computational thinking.

At the same time, COSMOTE, with the support of STEM Education, undertakes the training of the teachers of the 41 Schools with the aim of the best use of the equipment and the introduction of the students in the world of robotics.

## 2.3 SOCIAL COMMITMENT | 2.3.4 EMPLOYEE VOLUNTEERING

**EMPLOYEES SUPPORTED WITH TOYS  
3 NGOS FOR CHILDREN**

Employees donated more than **400 toys** at 3 NGOs for children. Specifically, COSMOTE organized during Christmas, the toy collection, the transfer and distribution to the 3 NGOs “Elefsina Love Center”, the “Hatzikonsta Foundation” and the “Children’s Village in Filiro”.

**BLOOD DONATION  
PROGRAM**

The Blood Donation Program of OTE Group in Greece has been running for more than 45 years and has since become a part of the Group’s culture. In 2021, a total of

**1,594**  
**units of blood**

were collected from OTE Group employees. 484 units were made available to meet the needs of employees and their families, while the remaining 1,110 were given to cover social needs throughout Greece.

Since 1976, OTE Group has collected more than 32,267 units of blood.

**BONE MARROW  
DONATION**

COSMOTE in collaboration with the NGO “Choose Life” and the University of Patra’s program “KEDMOP - Give life” created the program where employees can donate bone marrow and give hope to people who need a transplant. The program ran throughout 2021 and employees were able to come to the company’s walk-in clinics following all health and safety protocols.

In 2021, due to Covid 19 restrictions, there was limited sampling as a result of the reduced attendance of employees in the building facilities, thus **7 COSMOTE employees made a bone marrow donation**. Since the launch of the initiative, more than 567 COSMOTE employees have made a bone marrow donation.

# Governance

1<sup>ST</sup>

COMPANY IN GREECE RECOGNIZED  
AS ONE OF "WORLD'S  
MOST ETHICAL COMPANIES"

1

RISK MANAGEMENT TOOL  
FOR ALL GROUP COMPANIES

0

COURT CONVICTIONS  
FOR CORRUPTION ISSUES

## In this chapter:

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## 3.1 Corporate Governance Structure and Members



OTE GROUP OF COMPANIES  
COMPLIES WITH THE PROVISIONS  
OF THE LEGISLATION IN FORCE  
ON CORPORATE GOVERNANCE

and adopts relevant applicable international practices and standards.

OTE S.A. (hereinafter “OTE” or the “Company”) is a large capitalization company, listed on the Athens and London Stock Exchanges, and as such complies with current legislation on corporate governance, incorporating regulations and compliance practices into its operations. At the same time, aiming at transparency, efficient administration and optimum operating performance, OTE complies with the **2021 Hellenic Corporate Governance Code** (HCG Code) for Listed Companies and according to applicable legislation publishes its Corporate Governance Statement, as a special section of the Annual Report of the Board of Directors to the General Meeting of Shareholders and justifies any

deviations in its operation from the principles of the HCG Code (principle of “comply or explain”). Beyond legal requirements, OTE has also adopted a Compliance Management System (CMS).

Relevant obligations and practices are, in their majority, incorporated in the **Articles of Incorporation**, the Internal Regulation of Operations, the **OTE Group Code of Conduct** and other internal Regulations and Policies or best practices adopted by the competent corporate bodies and apply to OTE’s operations.

Moreover, OTE has established the necessary mechanisms to periodically update the aforementioned Regulations and Policies in order

to ensure OTE’s compliance with existing legislation and international best practices.

The fundamental principles of OTE’s Corporate Governance system relate mainly to:

- Two-way communication between stakeholders and the Company’s Management
- Transparency and control of Management
- Assurance of operational effectiveness.

More information is provided in OTE “**Corporate Governance**” website and in the Annual Report of the Board of Directors for the fiscal year 2021 (which is included in the **Annual Financial Report for 2021**).

### Committees

The activity of the Board of Directors of OTE is supported by:

- The Audit Committee.
- The Remuneration and Nomination Committee.

In addition to the foregoing, the activity of OTE’s Board of Directors is supported by the OTE Group Compliance, Enterprise Risks and Corporate Governance Committee (GRC Committee), which operates in accordance with the CEO’s decision for its formation and operation. For more information on the above-mentioned Committees, you may refer to the relevant Sections below.



## 3. GOVERNANCE | 3.1. CORPORATE GOVERNANCE STRUCTURE AND MEMBERS

**Meet the Board of Directors (31 December 2021)****Michael Tsamaz**

Chairman and CEO

Executive member

---

TENURE: 2010 -2024      NATIONALITY: Greek

**Eelco Blok**

Vice Chairman

Independent  
Non-executive member

---

TENURE: 2019 -2024      NATIONALITY: Dutch

BOARD COMMITTEES:

- Audit Committee (Chairman).
- Remuneration & Nomination Committee (Chairman).

**Robert Hauber**

Member

Non-executive member

---

TENURE: 2017-2024      NATIONALITY: German

**Kyra Orth**

Member

Non-executive member

---

TENURE: 2018-2024      NATIONALITY: German

BOARD COMMITTEES:

- Remuneration & Nomination Committee

**Dominique Leroy**

Member

Non-executive member

---

TENURE: 2020-2024      NATIONALITY: Belgian

**Charalampos Mazarakis**

Member

Executive member

---

TENURE: 2012-2024      NATIONALITY: Greek

## 3. GOVERNANCE | 3.1. CORPORATE GOVERNANCE STRUCTURE AND MEMBERS

**Grigorios Zarifopoulos**

Member

Non-executive member

TENURE:  
2021-2024      NATIONALITY:  
Greek**Rodrigo Diehl**

Member

Non-executive member

TENURE:  
2021-2024      NATIONALITY:  
German**Catherine de Dorlodot**

Member

Independent  
Non-executive memberTENURE:  
2021-2024      NATIONALITY:  
Belgian

BOARD COMMITTEES::

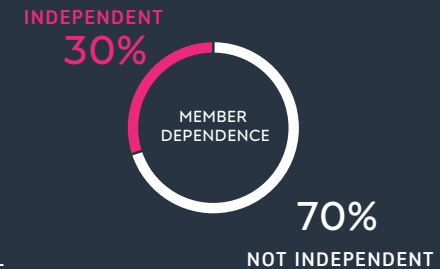
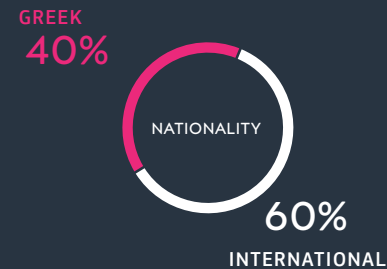
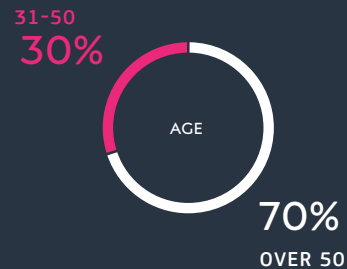
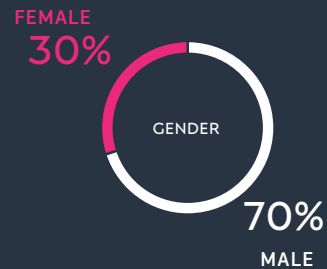
- Audit Committee.
- Remuneration & Nomination Committee.

**Dimitrios Georgoutsos**

Member

Independent  
Non-executive memberTENURE:  
2019-2024      NATIONALITY:  
GreekBOARD COMMITTEES::  
• Audit Committee.

The full CV's of the current members of the Board of Directors can be found in the [Annual Financial Report 2021](#) and on the Company's [website](#).

**BOARD OF DIRECTORS  
IN NUMBERS**

## 3. GOVERNANCE | 3.1. CORPORATE GOVERNANCE STRUCTURE AND MEMBERS

**Meet the Management Team (31 December 2021)**

**Michael Tsamaz**  
OTE Group Chairman  
and CEO



**George Athanasopoulos**  
OTE Group Chief Information  
Technology Officer



**Panayiotis Gabrielides**  
OTE Group Chief Marketing  
Officer Consumer Segment



**Stefanos Theocharopoulos**  
OTE Group Chief Technology  
and Operations Officer



**Ioannis Konstantinidis**  
OTE Group Chief Strategy,  
Transformation and Wholesale Officer



**Charalampos Mazarakis**  
OTE Group  
Chief Financial Officer



**Iri Nikolaidi**  
OTE Group Legal Counsel -  
Chief Legal and Regulatory  
Affairs Officer



**Elena Papadopoulou**  
OTE Group Chief  
Human Resources Officer



**Athanasios Stratos**  
OTE Group Chief  
Customer Operations Officer



**Grigoris Christopoulos**  
OTE Group Chief Commercial Officer  
Business Segment



**Dimitris Michalakis**  
COSMOTE TV  
Executive Director



**Deppie Tzimea**  
OTE Group Corporate  
Communications and  
Sustainability Executive Director

## 3. GOVERNANCE | 3.1. CORPORATE GOVERNANCE STRUCTURE AND MEMBERS

**Konstantinos Vasilopoulos**

OTE Group Internal Audit  
Executive Director

**Aristodimos Dimitriadis**

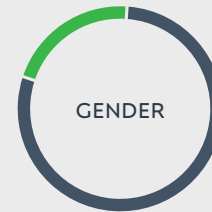
OTE Group Compliance, ERM  
and Insurance Executive Director



The full CV's of the current members of the Management Team can be found in the [Annual Financial Report 2021](#) and on the Company's [website](#).

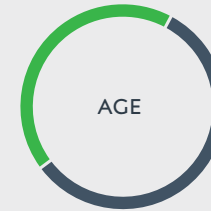
**MANAGEMENT TEAM  
IN NUMBERS**

FEMALE  
21%



79%  
MALE

31-50  
43%



57%  
OVER 50

## 3.2 Board of Directors

The Board of Directors (BoD) of OTE constitutes the top administrative body of the Company, without prejudice to the General Assembly's exclusive powers under applicable legislation. Its duty is to safeguard the general interests of the Company and ensure its operational efficiency.

The General Assembly of OTE's Shareholders is the highest corporate body in terms of hierarchy and elects the Board members, including the Independent - Non Executive members, in accordance with the requirements of legislation.

The General Assemblies of other OTE Group Companies, also elect their Board of Directors members. However, the necessity to designate the BoD members' competencies as executive, non-executive and independent non-executive, is applicable only to OTE, due to the fact that it is a Company with shares listed on a regulated market.

In respect of OTE Corporate Responsibility, it is noted that during the approval process of the annual Company Strategy by the Board of Directors, a discussion takes place between the BoD members, among others, with regard to OTE Corporate Responsibility strategic objectives, included therein.

The **OTE Board of Directors**, on 31 December 2021, was comprised of ten (10) members, two (2) executive and eight (8) non-executive, of whom three (3) were independent. Furthermore, out of the ten (10) OTE Board of Directors members, seven (7) were male and three (3) female.

The Annual General Assembly of 2020 approved a **Remuneration Policy** for the members of the Board of Directors (executive and non-executive, including the independent non-executive members), which is valid until 31/12/2023 (unless during this period the General Assembly decides to amend it or there is a substantial change in the conditions under which it was drawn up), in accordance with articles 110-111 of Law 4548/2018. Furthermore, the Annual General Assembly of 2021 examined the **Remuneration Report for the year 2020**, which the Board of Directors submitted for consultation pursuant to Article 112 of Law 4548/2018.

### Main Responsibilities

The Board of Directors, according to the **Company's Articles of Incorporation** and as part of its responsibilities:

- Convenes Annual or Extraordinary General Meetings of shareholders and proposes on their agenda.
- Prepares and approves the Company's annual financial reports and submits them to the General Meeting of shareholders.
- Approves the Company's strategy and decides upon the establishment of subsidiaries or upon the Company's participation in the share capital of other companies (domestic or foreign) as well as the establishment of branches or offices (domestic or foreign).
- Is informed systematically on the course of the Company's business and the implementation of

its plan with a view to protecting the Company's broader interests.

- Decides upon share capital increases through the issuance of new shares and convertible bonds, following the authorization granted by the General Meeting of shareholders.
- Decides upon the issue of convertible or exchangeable bonds.

### Managing Director

The Company's Managing Director, is appointed by the Board of Directors, following the election by the General Meeting as a member of the Board. He is the chief executive officer of the Company, heads all the departments of the Company, directs their work, adopts the necessary decisions within the context of the provisions governing the operation of the Company, of the programs, the budgets and strategic plans approved by the Board. The Board of Directors at its discretion may delegate to the Managing Director, the authority and power, at his discretion to decide and represent the Company, either in person or by proxy on any matter pertaining to administration of the Company affairs other than: (i) the matters reserved to the General Meeting of the Shareholders or the Board of Directors as provided by Law 4548/2018 any other applicable legislation and the Company's Articles of Incorporation and (ii) the Special Matters pursuant Article 8 paragraph 4 of the Company's Articles of Incorporation.

The Managing Director represents the Company in courts, extrajudicial proceedings and before

every Authority for every act, be it under his own authority or the authority of the Board of Directors, acting in person or by granting proxy rights to third persons to represent the Company.



3. GOVERNANCE | 3.2 BOARD OF DIRECTORS

**Board of Directors – Members and meeting attendance**

During 2021 the Board of Directors held twenty one (21) meetings. The attendance of each member of the Board of Directors during 2021, appears in the following table:

BOARD OF DIRECTORS MEMBERS AND MEETING ATTENDANCE			
NAME	NUMBER OF MEETINGS DURING THE TERM	NUMBER OF MEETINGS BEING PRESENT	NUMBER OF MEETINGS BEING REPRESENTED
Michael Tsamaz	21	21	-
Eelco Blok	21	21	-
Rodrigo Diehl	5	5	-
Catherine de Dorlodot	14	14	-
Robert Hauber	21	18	3
Dominique Leroy	21	19	2
Kyra Orth	21	16	5
Dimitrios Georgoutsos	21	21	-
Grigorios Zarifopoulos	14	14	-
Charalampos Mazarakis	21	21	-
Michael Wilkens	15	11	4
Vasilios Vassalos	7	7	-
Srinivasan Gopalan	-	-	-



## 3.3 Audit Committee

### Overview

The Audit Committee is required to be formed by at least three (3) independent non-executive members from the Board of Directors. The majority of the members (including the Chairman) should be independent. On 31 December 2021, the Committee consisted of three (3) independent non-executive members of the Board of Directors, including the Committee's Chairman.

The main purpose of the Audit Committee is to support the Company's Board of Directors in its duties to ensure the adequate and efficient operation of the Company's Internal Control System, i.e. all internal control mechanisms and procedures (especially in terms of financial reporting, risk management, internal audit, compliance and the monitoring of the statutory audit), which covers on a continuous basis the activities of the Company and contributes to its safe and efficient operation.

### Main Responsibilities

The following AC responsibilities are indicative in the sense that ad hoc Audit Committee needs or a new legislative and regulatory framework or the principles of corporate governance may lead to the modification of such responsibilities. In this context, the Audit Committee, inter alia:

- Examines and appraises the adequacy, effectiveness and efficiency of the policies, procedures, safety nets and in general internal

auditing mechanisms of the Internal Control System (ICS), covering the Company's activities and contributing to its safe and efficient operation;

- Monitors the effectiveness of the Internal Control System mainly through the work of the Internal Audit Unit, the Compliance Unit, the Enterprise Risk Management Unit and the work of the statutory auditors;
- Investigates and evaluates the independence of the Internal Audit Unit, as determined by the current legal and regulatory framework and the Company's internal procedures and ensures its unhindered access to all core information and records of the Company. Additionally, it monitors and inspects the proper functioning of the Internal Audit Unit in accordance with professional standards as well as the applicable legal and regulatory framework and evaluates its work, adequacy and effectiveness, without affecting its independence;
- Supervises the proper functioning of the Enterprise Risk Management Unit and ensures the effective functioning thereof;
- Supervises the proper operation of the Compliance Unit and ensures its efficient operation;
- Monitors, examines and evaluates the process of drafting financial information, including the OTE Group ICS safeguard system;
- Monitors, examines and evaluates the process of statutory audit and the independence of the statutory auditors;
- Supervises the OTE Group Data Privacy Officer;
- Monitors, examines and evaluates the

- procedures for the prevention, detection and suppression of conflict of interest situations;
- Confirms or not the evaluation carried out by the competent business units in relation to the intended transactions with related parties as "ordinary", in accordance with the "Policy for concluding transactions with related parties";
- Reviews the information disclosed in relation to the financial reporting;
- Supervises the selection process for the candidates who will carry out the periodic evaluation of the Internal Control System, proposes such candidates to the Board of Directors and is the recipient of the relevant Evaluation Report;
- Informs the Board of Directors on its findings as to the above and submits proposals for corrective actions if this is deemed appropriate.

Information regarding the responsibilities of the Audit Committee is available in the [Audit Committee Regulations](#).

### Actions

In 2021, the Audit Committee dealt with issues, summarized as follows:

- Monitoring and appraisal of the adequacy, effectiveness and efficiency of the policies, procedures and safety nets in relation to both the Internal Audit System and the assessment of the risk management in relation to financial reporting.
- Approval and monitoring of the Company's

Internal Audit business unit activities.

- Approval and monitoring of the activities of the Compliance, Enterprise Risk Management and Insurance business unit.
- Monitoring and evaluation of the process of compiling financial information, as well as of the statutory auditors' services.
- Assessment of the accuracy and consistency of the Financial Statements.
- Assurance of the statutory auditors' independence, in relation to the services provided by the latter to the companies of the OTE Group and approval of the budget for the statutory auditors' fees for the fiscal year 2021.
- Submission of a recommendation to the Board of Directors for the selection of an audit firm for the statutory audit of the financial statements for the fiscal year 2021.
- Submission of a justified recommendation to the Board of Directors regarding the preferred as well as the alternative option for the election of an audit firm for the statutory audit of the year 2022 following a relevant tender procedure, in accordance with Regulation (EU) 537/2014 and Article 44 of Law 4449/2017.
- Confirmation on whether the conditions for the assessment made by the competent Business Units for intended transactions of the Company with related parties as "ordinary", are fulfilled, based on the information provided to the Committee by the competent Business Units which are responsible for providing complete and accurate information to the Committee.
- Approval and oversight of activity of the Data Protection Officer of OTE Group.

## 3. GOVERNANCE | 3.3 AUDIT COMMITTEE

- Provision of information to the Board of Directors and submission of proposals on issues falling within the context of the Committee's responsibilities.

Furthermore, within the context mentioned above, in 2021 the Audit Committee, dealt with the review and assessment of the completeness, accuracy and precision of the Periodic OTE Group Compliance Reports - which include, among others, information on the handling and the results thereof, of complaints and accusations - as well as the OTE Group Enterprise Risk Management Reports. The OTE Group Compliance Reports and the OTE Group Enterprise Risk Management Reports are submitted at first to the OTE Group Compliance, Enterprise Risks and Corporate Governance Committee, which reviews and assesses these Reports, and, subsequently, to the competent corporate bodies, i.e. the Audit Committee and the Board of Directors.

### Audit Committee – Members and meeting attendance

In regard to the Audit Committee, the attendance of its Chairman and its members in the Committee meetings during 2021 is presented below:

#### AUDIT COMMITTEE MEMBERS AND MEETING ATTENDANCE



NAME	NUMBER OF MEETINGS DURING THE TERM	NUMBER OF MEETINGS BEING PRESENT	NUMBER OF MEETINGS BEING REPRESENTED
Eelco Blok	15	15	-
Dimitrios Georgoutsos	15	15	-
Catherine de Dorlodot	10	10	-
Vasilios Vassalos	5	5	-

## 3.4 Remuneration and Nomination Committee

The Remuneration and Nomination Committee is a committee of the Board of Directors which was established in July 2021, in accordance with Law 4706/2020 on corporate governance and the Hellenic Corporate Governance Code 2021, following a decision of the Board of Directors of the Company for the unification of its two separate -until then- committees (namely, the Compensation & Human Resources Committee that was established in 2004 and the BoD Nomination Committee that was established in 2019) in a joint committee and delegating to this joint Committee both the responsibilities provided for in the legislation in force for the remuneration committee and those provided for the nomination committee.

The Remuneration and Nomination Committee has three members and consists exclusively of non-executive members of the Board of Directors, in their majority independent.

The Chairman and the members of the Committee are appointed by the Company's Board of Directors.

The purpose of the Remuneration and Nomination Committee is to provide support and assistance to the Board in its duties regarding:

- The remuneration of Board members and key management personnel of the Company, especially the head of the internal audit unit.
  - Ensuring the adequate staffing and the appropriate succession and continuity of the Board in order to effectively fulfill its role for the benefit of the Company and all stakeholders.
- The particular responsibilities of the Committee and the relevant procedures for the fulfilment of its

forementioned purpose, are described in its **Regulation of Operations.**

Within the framework of its responsibilities, the Committee during 2021 dealt with issues summarized as follows:

- Procedure for finding a candidate to fill the position of a non-executive member of the Board of Directors to replace a resigned non-executive member (in particular, determining the criteria of individual and collective suitability for filling the position in question and assignment to an external consultant to identify and evaluate executives, for the support of the Committee in its work, approval of the initial list of candidates and submission of a proposal to the Board of Directors regarding the predominant candidate).
- Approval of the assignment to an external consultant of the task of providing advisory support to the Remuneration and Nomination Committee for the evaluation of the Board of Directors and the Committees of the Board of Directors of the Company.
- Submission of a proposal to the Board of Directors for the revision of the Suitability Policy of the members of the Board of Directors of the Company.
- Submission of a proposal to the Board of Directors for the renewal of the term of the agreement entered into between the Company and the Managing Director.
- Submission of a proposal to the Board of Directors in relation to the remuneration of the Company's executives (calculation of legal indemnity).

### Remuneration and Nomination Committee – Members and meeting attendance

The attendance of the Chairman and the members of the Remuneration and Nomination Committee in the Committee meetings during 2021 (following its establishment in July 2021), which were six (6) meetings in total, appears in the following table:

REMUNERATION AND NOMINATION COMMITTEE MEMBERS AND MEETING ATTENDANCE			
NAME	NUMBER OF MEETINGS DURING THE TERM	NUMBER OF MEETINGS BEING PRESENT	NUMBER OF MEETINGS BEING REPRESENTED
Eelco Blok	6	6	-
Catherine de Dorlodot	6	6	-
Kyra Orth	6	5	1

As mentioned above, until July 2021 the following two Committees operated separately: the Compensation and Human Resources Committee and the Board of Directors Nomination Committee.

### Compensation and Human Resources Committee

According to the Regulation of its Operation, the Compensation and Human Resources Committee held at least two (2) meetings every year.

### Actions

Concisely, in 2021, the Committee, within the framework of its responsibilities, dealt, among others, with the issues below:

- Submitted proposals to the Board of Directors, inter alia, on issues of remuneration of the executive members of the Board of Directors and other executives (such as Head of Internal Audit, Head of Compliance).

3. GOVERNANCE | 3.4. REMUNERATION AND NOMINATION COMMITTEE

• Also examined the annual Remuneration Report which the Board of Directors subsequently submitted for discussion to the 69th Annual General Meeting of Shareholders of 9-6-2021 in accordance with article 112 of law 4548/2018.

The attendance of the Chairman and the members of the Compensation and Human Resources Committee in the Committee meetings during 2021 (until 14/7), which were four (4) meetings in total, appears in the following table:

COMPENSATION AND HUMAN RESOURCES COMMITTEE  
MEMBERS AND MEETING ATTENDANCE (UNTIL 14/7/21)



NAME	NUMBER OF MEETINGS DURING THE TERM	NUMBER OF MEETINGS BEING PRESENT	NUMBER OF MEETINGS BEING REPRESENTED
Eelco Blok	4	4	-
Kyra Orth	4	3	1
Catherine de Dorlodot	1	1	-
Dominique Leroy	3	1	2
Srinivasan Gopalan	-	-	-

**Board of Directors Nomination Committee**

The Board of Directors Nomination Committee (BoD Nomination Committee) was established on June 12, 2019 by decision of the Company's Board of Directors for the purpose of an effective and transparent procedure for the nomination of candidates as Independent non-executive members of the Board of Directors.

**Actions**

The Committee, within the framework of its responsibilities, in 2021 (until 14/7) dealt with the following issues:

- Submitted a proposal to the Board of Directors for the approval of the Suitability Policy for the

members of the Board of Directors in accordance with L.4706/2020 and Circular No. 60/18.9.2020 of the Hellenic Capital Market Commission, which the Board of Directors subsequently submitted for discussion to the 69th Annual General Meeting of Shareholders held on 9-6-2021.

- Determined the procedure and criteria for finding a candidate for the position of independent non-executive member of the Board of Directors and member of the Audit Committee, assigned to an external consultant to identify candidates who meet the specified criteria and submitted a proposal to the Board of Directors regarding the predominant candidate for the position to be filled.

The attendance of the Chairman and the members of the BoD Nomination Committee in the Committee meetings during 2021 (until 14/7), which were five (5) meetings in total, appears in the following table:

BOARD OF DIRECTORS NOMINATION COMMITTEE  
MEMBERS AND MEETING ATTENDANCE (UNTIL 14/7/21)



NAME	NUMBER OF MEETINGS DURING THE TERM	NUMBER OF MEETINGS BEING PRESENT	NUMBER OF MEETINGS BEING REPRESENTED
Eelco Blok	5	5	-
Kyra Orth	5	4	1
Catherine de Dorlodot	1	1	-
Dominique Leroy	4	2	2
Srinivasan Gopalan	-	-	-



## 3.5 Compliance, Enterprise Risks and Corporate Governance Committee

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### Overview

---

OTE Group Compliance, Enterprise Risks and Corporate Governance Committee's primary mission is to support, review and monitor the implementation of the Compliance and Risk Management Systems (CMS and RMS) and the issues of Corporate Governance at OTE Group level.

### Main Responsibilities

---

The Committee supports the Executive Director Compliance, Enterprise Risk Management and Insurance OTE Group on Compliance, Enterprise Risk Management, Corporate Governance and Human Rights issues.

The Committee, inter alia:

- Designates the strategic issues regarding Corporate Governance, Compliance, Enterprise Risks and Human Rights, keeping abreast of international best practices.

- Monitors and reviews the implementation of programs for the effective operation of the Compliance Management (CMS), Enterprise Risk Management (RMS) and Corporate Governance Systems, as well as for the development of the Action Plan on Human Rights issues.
- Supports business units in their risk analysis, ensuring efficient communication between employees and Management about the implementation of the RMS and CMS Programs.
- Proposes the appropriate measures/procedures and policies to the competent corporate bodies to be approved on the issues of its competences

and supports the design of the implementation of these measures.

- Reviews the reports and the results of Compliance and Enterprise Risks procedures, assesses the completeness, accuracy and precision of the reports that are being submitted to the competent corporate bodies and submits, in its discretion, briefings/reports to the competent corporate bodies regarding Compliance, Enterprise Risks, Corporate Governance & Human Rights issues.

## 3.6 Sustainability Governance

The governance structure, through which sustainability issues are embedded in the key business processes, is reflected in the current OTE Group Sustainability Policy.

The OTE Board of Directors (BoD) represents OTE's interests in sustainability issues regarding the entire Group and is responsible for its sustainability performance. Specifically, among others, the BoD approves the Sustainability strategy, approves Group-wide sustainability policies in response to important sustainability/ESG issues and significant strategic actions, monitors the Group's sustainability/ESG performance and the relevant risk management, identifies the stakeholders that are important to the Company, depending on its characteristics and strategy, and understands their collective interests and how they interact with its strategy. Binds and monitors the executive administration on matters relating to new technologies and environmental issues. Approves the annual Integrated Report.

The CEO of OTE proposes the Group's Sustainability strategy to the BoD and its amendments, proposes Group-wide sustainability policies in response to important sustainability/ESG issues and significant strategic actions for submission to the BoD for approval, proposes to the BoD the annual Integrated Report, as well as the content of other publicly available sustainability/ESG reports- when required (eg non-financial report), oversees the implementation of the sustainability strategy and the Group's sustainability/ESG performance, and

the overall sustainability/ESG issues for informing the BoD.

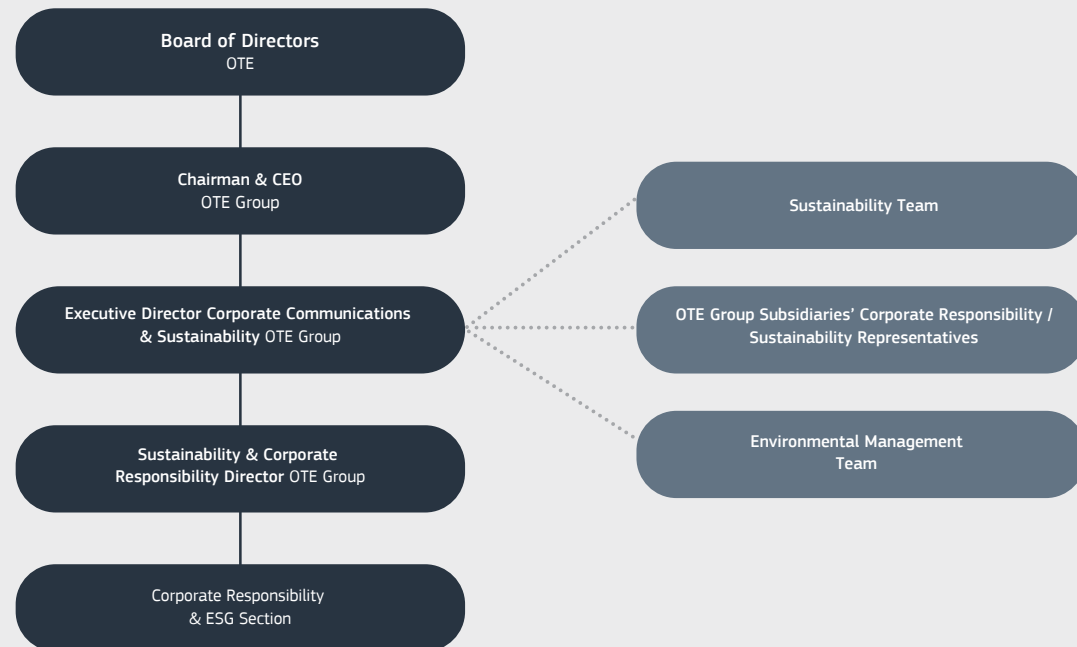
The Executive Director Corporate Communications & Sustainability OTE Group designs and contributes to the implementation and further development of the OTE Group's sustainability strategy and environmental strategy. Develops

and implements measures to incorporate sustainability/ESG into the Group's business strategy, procedures and activities, as well as cooperates with the competent executives to efficiently implement the sustainability strategy and embed ESG criteria into the Group's operation and activities. Contributes to the identification of

material sustainability issues, as well as collaborates and informs OTE's competent executives and- where applicable- executives from affiliate companies of the Group.

The Group Executives must integrate the BA and the ESG criteria in their areas of responsibility.

### ORGANIZATIONAL STRUCTURE



## 3. GOVERNANCE | 3.6 SUSTAINABILITY GOVERNANCE

OTE Group subsidiaries shall integrate sustainability and ESG criteria into their business strategy, operations and activities. They are required to implement OTE Group's sustainability strategy, adhere to relevant standards and meet the Group's sustainability/ESG requirements and targets, at a corporate individual level.

OTE Group's Sustainability Team consists of representatives from several companies' business units. The Head of the team is the Executive Director Corporate Communications & Sustainability OTE Group. Among others the Sustainability Team has as goal the alignment of all the Company's business units and affiliates of the Group with the Group's sustainability strategy and the dissemination of the sustainability strategy and activities to the various business units of OTE and to the affiliates of the OTE Group.

It should be noted that in the Company's Regulation of Operations, and the Audit Committee's "Annual Activities Report", which the Audit Committee submits to the Annual General Meeting of the Shareholders of the Company, the description of the sustainable development policy, that the Company follows, is included.

The Sustainability & Corporate Responsibility Director coordinates the implementation of social and environmental actions of the companies, though the operation of the Corporate Responsibility & ESG Section.

### Sustainability Team

OTE Group's Sustainability Team, consisting of more than 50 representatives from all business units, is responsible for the management of sustainability and corporate responsibility issues. The Head of the team is the Executive Director Corporate Communications OTE Group.

Team Goals:

- Alignment of all the Company's business units and affiliates of the Group with the Group's sustainability strategy.
- Dissemination of the sustainability strategy and activities to the various business units of OTE and to the affiliates of the OTE Group.
- Improvement of the Group's sustainability and ESG performance.
- Raise awareness and motivation Group's employees around sustainability issues
- Contribution to the definition and achievement of the Group's sustainability/ESG objectives and targets.
- Collection of sustainability and ESG-related data and information
- Contribution to the stakeholder dialogue and engagement.

Sustainability indices have been integrated in the self- assessment goals and the individual operational objectives of the members of the Business Unit of the Executive Director Corporate

Communications OTE Group and the Sustainability Team. All members of the Sustainability Team have a "badge" assigned to their profile, which is displayed on the companies' intranet. The "badge" outlines their membership in the Sustainability Team, giving them recognition throughout the Group.

Corporate responsibility principles are taken into account in the annual performance evaluation process of all employees, as described in the **Employee Selection, Attracting and Retaining Talented Employees** section.

## 3.7 Enterprise Risk Management

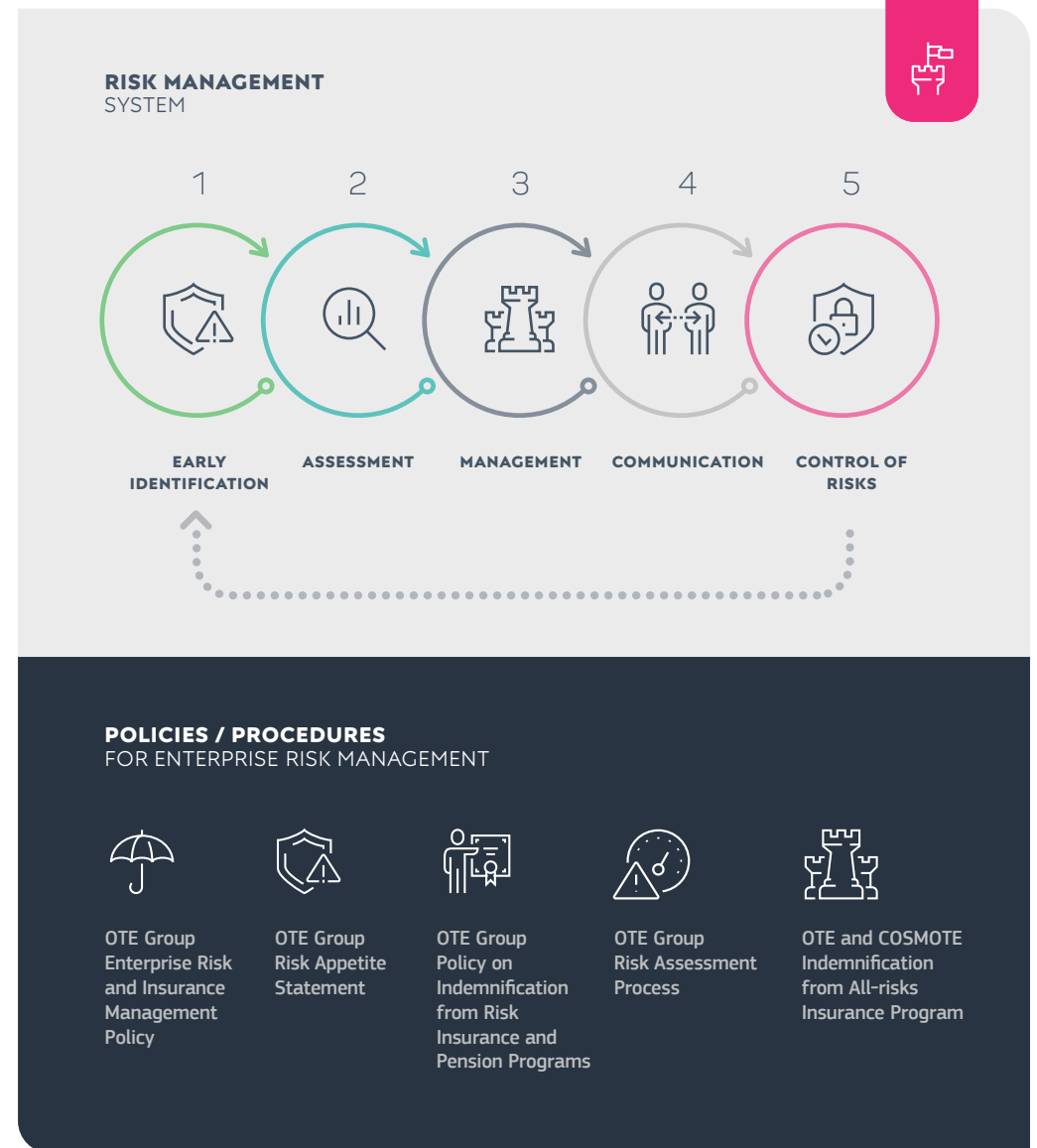
Business activities are subject to uncertainty, due to internal and external events, that may affect corporate objectives and cause deviations from the expected outcome. By systematically tracking uncertainty, it is possible to undertake appropriate measures early on and reduce risks, by minimizing, to the extent possible, the deviations from planned goals. For this reason, a functioning risk management system, which supports efforts to secure corporate success in a sustainable way, is a core element of value-based corporate governance.

OTE Group has developed and implements a robust Risk Management System (RMS), aiming to safeguard the Group's future business success. More specifically, the RMS supports OTE Group's Management in strategic decision-making by identifying, evaluating, communicating, and addressing corporate risks. It is based on the COSO ERM Framework and the ISO 31000:2018 Standard on Risk Management. OTE, COSMOTE and Telekom Romania Mobile Communications have been attested according to the above standard.

Through the RMS, the enterprise risks are identified, systematically assessed, and monitored with regards to their mitigation actions and their implementation. The risk landscape of the RMS consists of strategic, financial, operational, regulatory, compliance and legal risks. All enterprise risks are included in the OTE Group Corporate Risk Register, with detailed information for each one of them, including the description of the risk, the changes of the current reporting period, the name of the risk and mitigation owner(s), as well as the measures taken for the risk mitigation, their status, and deadlines for their implementation.

Major achievements in 2021, include:

- Implementation of the new Risk Management Tool TRMS (Telekom Risk Management Solution) for OTE Group and its affiliates (15 Risk Reports in total).
- Conducting TRMS (Telekom Risk Management Solution) Tool training to risk reporters of OTE Group affiliates.
- Confirmation on ISO 31000:2018 "Risk Management – Guidelines", obtained by OTE, COSMOTE and CTS. Germanos is scheduled in Q1 2022.
- Updating the OTE Group "Risk Appetite Statement" which was first adopted in 2018.
- Integration of Business Units' Risk Assessments results, which were conducted, based on a common enterprise risk methodology, to the OTE Group Risk Register.
- Conducting the 1st OTE Group e-Learning on Risk Management. The first phase was directed to managers and a second phase will be organized for all employees in 2022.
- Development of Risk Assessment Tool "Risk Score Calculator" for ICT projects, in order to support decision making.
- Submitting four (4) **Enterprise Risk Management Reports** to the OTE Group Compliance, Enterprise Risks and Corporate Governance Committee (GRC Committee). The reports were reviewed, evaluated, and subsequently submitted to the OTE Audit Committee and the OTE Board of Directors.
- Successfully received approval for the **annual self-assessment** by the OTE Audit Committee, regarding the implemented Risk Management System at OTE, COSMOTE and Telekom Romania Mobile Communications.



## 3.8 Compliance Management

### WHY IT MATTERS

Compliance of an organization with the applicable ethical business practices and regulations is an essential obligation for responsible business. OTE Group Management and its stakeholders effectively require the Group to comply with laws and regulations and to bear zero tolerance in the areas of fraud, corruption, illegal acts, and misconduct as well as to ensure that OTE Group employees comply with the Group's Code of Conduct and that they do not act on their own vested interests.

The assurance of compliance is one of the Company's top priorities. Compliance stands for a solid commitment to the principles of integrity, transparency, fairness, professionalism, team spirit as well as of respect for the rules; principles, which are essential to govern the operation of the Group. In this respect, the **Compliance Management System (CMS)**, which mainly focuses on prevention measures, addresses the compliance of all - employees and Management - with current legislation, the Code of Conduct and internal Policies.

To this end, all OTE Group employees, upon hiring and on an annual basis, are required to digitally or manually sign that they are aware of and comply with the Group's Code of Conduct, as well as with all other Compliance policies. The Code of Conduct applies to all OTE affiliated companies, which have all adopted the Code through their competent Bodies. On that basis as well, suppliers are contractually obliged to adhere to the Code of Conduct, the Supplier Code of Conduct and the Code of Human Rights and Social Principles.

Any employee and/or third parties (customers, vendors, partners, etc.) may report (eponymously or anonymously) inappropriate conduct or any concern or complaint about potential violations of corporate Policies or current legislation, to **Compliance communication channels**. In such an event, plausibility check and, if necessary, investigation of the compliance violation takes place and the appropriate measures are decided, whenever it is required.

Furthermore, in case of a compliance violation by an employee with regards to OTE Group's internal Policies, a disciplinary fine on employee remuneration or a reduction of the annual performance bonus is imposed.

All **Codes** and **Policies**, which are mentioned on the Company's **website**, are regularly updated to ensure continued compliance with applicable legislation and best international practices.

The CMS has been certified according to the international standards ISO 37001:2016 (Anti-Bribery Management Systems) and ISO



37301:2021 (Compliance Management Systems), for OTE, COSMOTE, COSMOTE TECHNICAL SERVICES (CTS), Germanos and Telekom Romania Mobile Communications. Moreover, in 2021, a

Compliance Management System (CMS) Certification on Anti-Corruption (Assurance Standard 980) was obtained by OTE and COSMOTE.



3. GOVERNANCE | 3.8 COMPLIANCE MANAGEMENT

Major achievements in 2021 include:

- A **Compliance Risk Assessment** was conducted. The business units' representatives represented 100% of the functions (14 functions). Risks assessed included, amongst others: corruption, violation of the Procurement Policy, third-party risks, embezzlement, theft, fraud, conflicts of interest, violation of anti-money laundering legislation, breaches of anti-trust, misuse of personal data, etc. One of the aspects taken into consideration during this assessment was the pandemic. As a result, a Compliance Measure Plan for 2022 was drafted.
- **20 Compliance Management System (CMS) Assessments** were conducted at OTE Group companies.
- **More than 4,600 Group employees participated in the Compliance Training program** (training seminars on anti-corruption and other issues (face-to-face and virtual), introductory training for new entrants, on-site awareness trainings, and e-learning programs).
- **The procedure of the Compliance Annual Statements**, i.e. the Conflicts of Interest Statements and the Compliance Statements, which are submitted by the OTE Group employees, in order to confirm that they comply with the values of the OTE Group Code of Conduct and they abide by the terms and guidelines included in the Compliance Policies, was successfully completed for all OTE Group companies. Also, the majority of OTE Group companies have digitized the procedure.



- **Annual Statements were signed by the Senior Financial Officers** regarding their compliance with the applicable Code of Ethics for Senior Financial Officers, aiming at honest and ethical professional conduct.
- **Group-wide digital communication campaigns focused on raising awareness on Anti-corruption, Anti-fraud, Human Rights issues, Submission of Compliance Statements, Guiding Principles** as well as the **Adoption of the Policy for Diversity, Equity and Inclusion in the OTE Group** were addressed to all OTE Group companies in collaboration with Corporate Communications and HR Departments accordingly. The first three of the aforementioned campaigns were focused on the "zero tolerance"

approach i.e., zero tolerance to fraud/corruption incidents and to human rights violations.

- OTE participated in the evaluation of Ethisphere Institute's **"World's Most Ethical Companies"** award, where it was recognized as one of the 2022 World's Most Ethical Companies. OTE is the first company with such recognition in Greece for the second consecutive year and amongst few in Europe. "World's Most Ethical Companies' Award" is one of the most significant recognition and reward programs at company level with regards to corporate governance and commitment to advancing business integrity, globally.
- **The requirements of Law 4706/2020 on Corporate Governance, of the related Decisions**

of the Hellenic Capital Market Commission' BoD and of the provisions of the Hellenic Corporate Governance Code 2021 were implemented, in a joint effort by the Compliance and Legal departments. In this context, the following, inter alia, have been implemented:

- The OTE BoD Regulation of Operations was amended.
- A new OTE BoD Committee entitled Remuneration and Nomination Committee was established (in replacement of the existing Compensation & Human Resources Committee and the BoD Nomination Committee).
- The Remuneration and Nomination Committee's Regulation of Operations was adopted, the OTE Regulation of Operations was amended and a new COSMOTE Regulation of Operations (as one of OTE's primary subsidiaries) was adopted.
- New Policies were adopted as well i.e. the Suitability Policy for the members of OTE Board of Directors, the Education Policy for the members of the Board of Directors, the key management personnel, as well as the other executives of OTE S.A. (especially those involved in internal audit, risk management, compliance and IT systems), the Policy on the Evaluation of the Internal Control System and the application of the corporate governance provisions of L. 4706/2020, the OTE Group Diversity, Equity and Inclusion Policy.
- OTE Group Compliance Department's members participated in various conferences and events, including:

3. GOVERNANCE | 3.8 COMPLIANCE MANAGEMENT

- The 10th BIF Round Table with title “ESG Criteria & Sustainable Corporate Decisions” virtual panel held by Transparency International on 17.12.2021.
- The virtual panel “Compliance Programs against Bribery: Adoption, Application & Monitoring” held by the National Transparency Authority on 15.12.2021.
- The 4th Compliance Conference held by the Association of Compliance Officers in Greece on 05.11.2021.
- The event titled “How to cure procurement fraud” held by ACFE Greece on 10.06.2021.
- The event titled “The final straight before the implementation of the new Law on Corporate Governance: Conclusions deriving from the SEV-KPMG-Union of Listed Companies-HCGC survey on the enterprises’ readiness” held by SEV on 02.06.2021.
- The meeting titled “The Hellenic Capital Market Commission discusses with Internal Auditors” held by the Hellenic Institute of Internal Auditors (HIIA), in collaboration with NED Club Hellas on 25.02.2021.
- Four (4) **OTE Group Compliance Reports** were presented to the OTE Group Compliance, Enterprise Risks and Corporate Governance Committee (OTE Group GRC Committee). The reports were reviewed, evaluated, and subsequently submitted to the OTE Audit Committee and the OTE Board of Directors.
- The **annual self-assessment** was approved by the OTE Audit Committee, regarding the implemented Compliance Management System at OTE, COSMOTE and Telekom Romania Mobile Communications.
- The following Principles/Policies of corporate code of conduct and compliance were amended:
  - The “OTE Group Guiding Principles”. Despite its amendment in 2020, it was further deemed necessary to add, per Guiding Principle, anchors for persons holding positions of responsibility in the Company. Consequently, the updated OTE Group Guiding Principles entered into force on 01/01/2021. It is noted that the OTE Group Guiding Principles are integrated in the OTE Group Employee performance appraisal Policy and in the Employee Annual Evaluation Form, as it is a prerequisite for the Group’s Human Resources functions. Specifically, the Principle “Act with Respect and Integrity” is linked to the main Compliance values and, according to the respective guidelines, OTE Group employees have to strive for success without compromising respect and integrity and further foster with their actions an open, collaborative and rewarding culture.
  - The OTE Group Policy on Avoiding Corruption and Other Conflicts of Interest.
  - The Policy on Insider Trading (as a distinct policy for OTE and a distinct policy for COSMOTE).
  - Also, the OTE Group Diversity, Equity and Inclusion Policy has been adopted.
- **1,298 new employees** were trained in 2021, as part of the “**Welcome on Board**” program and “**Customer Care induction**” program, which include a specific module on Compliance issues.
- **515 employees from Internal Audit, Mergers and Acquisitions and Investor Relations, Large**



- **Enterprises and SME Direct Sales, Marketing functions, OTE Globe, OTE Academy and the rest of OTE Group companies in scope** were trained on anti-corruption and other compliance issues, via digital classroom.
- **Four e-learning training programs on Compliance Fundamentals and Anti-trust** (for OTE, COSMOTE, GERMANOS and COSMOTE E-value) and on **Human Rights and Ethical Leadership issues** (for the OTE Group companies in Greece), that have started in 2020, continued to run throughout 2021. Furthermore, **new launches of Compliance Fundamentals and Human Rights** took place for the OTE Group companies’ employees which were not included in the 2020’s launch.
- A training on compliance issues to shop partners/ franchisees was also launched at the end of 2020 and ran in 2021 via the training portal “**Sales Training**”.
- **Two e-learning programs on Compliance Fundamentals and Ethical Leadership** that have started in 2020 are in progress, in Romania. Moreover, **one e-learning on Anti-Corruption and Anti-Fraud** has been launched in 2021 and is in progress.

## 3. GOVERNANCE | 3.8 COMPLIANCE MANAGEMENT

**SIGNIFICANT DATA**  
2021

- **Fraud incidents and serious violations of OTE Group Code of Conduct by employees:**
  - 5 cases occurred, which resulted in the termination of contract of employees.
  - 3 cases occurred, for which final disciplinary sanctions were imposed by the competent 1st and 2nd degree disciplinary bodies.
- **No incidents of corruption regarding contracts with business partners**, which resulted in the termination of the contract or its non-renewal.
- **No incidents of anti-competitive behavior** reported (via internal channels) in 2021.
- No case occurred concerning a supplier leading to its exclusion from the 2021 tender procedures.
- No court convictions for corruption issues against OTE Group or its employees in relation to their professional activities.
- No fine or non-pecuniary penalty (e.g. a recommendation) for corruption or fraud violations (including tax fraud and manipulation of financial reporting) was imposed on OTE Group companies.

**681**

TIP OFFS/COMPLAINTS

received at the relevant compliance communication channels in 2021,  
with an average rate of 25 customers' complaints per month

**28**

TIP OFFS- COMPLAINTS

**35**GENERAL INFORMATION  
FROM **THIRD PARTIES****618**CUSTOMER COMPLAINTS ON  
**TECHNICAL/COMMERCIAL MATTERS****7**NOT  
PLAUSIBLE**18**

PLAUSIBLE

**3**UNDER  
INVESTIGATION

Appropriate per case measures were adopted i.e., strict warning letter, removal from position of responsibility, employment contract termination, disciplinary fine, establishment / implementation of new controls or revision of existing ones.

In 2021, the average time spent on consumer complaints was **9.75 working days** on an annual basis for Greece and approximately **5.41 days** (for B2B and B2C) for Romania.

The effectiveness and efficiency of the above systems (RMS and CMS) are monitored by the OTE Group GRC Committee, the Audit Committee, and the Board of Directors.

Additional information regarding Compliance Management and Enterprise Risk Management can be found in the [Annual Financial Report 2021](#).

## 3. GOVERNANCE | 3.8 COMPLIANCE MANAGEMENT

## CODE OF CONDUCT

OTE Group Commitment: The Code of Conduct of OTE Group Companies represents the principles and values they believe in and apply, the culture they seek to cultivate, and their vision for the future.

The existing Code of Conduct, which was updated in 2017, is the guide of the Group's corporate culture and reflects the common values and rules of conduct in the workplace and in its business relationships. Integrity, ethics and personal responsibility are without a doubt, priorities for all teams of the Group.

More than 15 employees of the OTE Group in Greece, from the business unit of the Executive Director Compliance, ERM and Insurance OTE Group and three more Directorates collaborated to update the Code of Conduct.

In 2021, a series of actions were conducted, such as training seminars and communication campaigns addressed to employees, to enhance the understanding and enable proper implementation of the Code of Conduct.

In addition, the Group has specialized communication channels in place, for the procedures: a) "Ask-me" for support in matters related to the Code of Conduct and Compliance Policies /Procedures and b) "Tell me / Whistleblowing", for reporting complaints/grievances regarding possible violations of the Code of Conduct, the Compliance Policies and current legislation.



In 2021, 13,271 employees (87.10%), submitted the annual Compliance Statements and, therefore acknowledged the Code of Conduct, while, at the same time, 144 training courses for employees (e-learning, digital classroom / classroom) were conducted, which covered the Code of Conduct principles. Furthermore, more than 4,000 employees were trained on the principles of OTE Group Code of Conduct. In addition, every year 100% of new employees are informed about the Code of Conduct.

# 77%

OF EMPLOYEES<sup>1</sup> STATED THAT THE CODE OF CONDUCT IS THE BASIS FOR EVERYTHING THEY DO IN THEIR DAILY WORK.

# 84%

OF EMPLOYEES<sup>2</sup> STATED THAT THEIR IMMEDIATE SUPERVISORS OPERATE IN ALIGNMENT BETWEEN WORDS AND DEEDS.

# 19%

INCREASE IN THE QUERIES RECEIVED THROUGH THE "ASK-ME" PROCESS regarding issues that fall under the OTE Group Code of Conduct, and as a result directions that strengthen the culture of compliance and reduce the Compliance risks (e.g. conflicts of interest, active / passive bribery, etc.) were given.

### Key Targets

16.5 Substantially reduce corruption and bribery in all their forms

1. Refers to employees of OTE, Cosmote, CTS, COSMOTE E-Value, OTE Globe, who participated in the Employee Satisfaction Survey, conducted in November 2021.
2. Refers to employees of OTE, Cosmote, CTS, COSMOTE E-Value, OTE Globe, who participated in the Employee Pulse Survey, conducted in May 2021.



## 3. GOVERNANCE | 3.8 COMPLIANCE MANAGEMENT

**Responsible Competition**

OTE Group promotes a truly responsible competition approach, with respect to consumer protection, complying with the laws of free competition and applying transparent business practices.

The Group complies firmly with all national and European telecoms, audiovisual media services and content regulations in Greece, as well as in all countries where it has commercial activities. Also it's the Groups priority to cooperate with governments, national agencies, authorities and other stakeholders, in order to formulate a regulatory framework that fosters competition which contributes to the overall social welfare.

The Group has developed internal policies to inform employees about the importance of compliance with the competition rules and systematically promoting the appropriate Codes of Conduct. OTE Group Policy on Anti-Trust Law, established in 2013, sets out the framework of operation for all companies and employees within the Group, regarding their compliance with the relevant legislation on the regulation of anti-competitive conduct.

**Regulatory Framework**

The provision of electronic communication networks and services is subject to national laws and regulations, in all countries of its operation. In September 2020, law 4727/2020 was published, transposing the European Electronic Communication Code (Directive EU 2018/1972)

into national law. Following the issuance of the abovementioned Law, Hellenic Telecommunications and Post Commission (HTPC) issued a new Regulation of General Authorizations. The new Law and the new Regulation update the framework for the provision of electronic communications products and services in Greece.

Accordingly, the provision of OTE's pay TV services under the name COSMOTE TV is regulated by the National Council for Radio and Television and is subject to national and EU laws and legislation. In February 2021, law 4779/2021 was published, transposing the Audiovisual Media Services Directive (EU) 2018/1808 into national law updating the audiovisual legal framework in Greece.

OTE, according to relevant Hellenic Telecommunications and Post Commission's (HTPC) decisions, issued at the end of December 2016, continues to have Significant Market Power and is subject to regulatory obligations in the wholesale local access market at a fixed location (market 3a/ 2014) and the wholesale central access market at a fixed location for mass-market products (market 3b/2014). Although the retail market for access to the fixed telephone network on a fixed location via PSTN, ISDN BRA, managed VoIP and ISDN PRA (market 1/2007) has been deregulated and OTE does not have Significant Market Power, OTE's control of retail prices by the HTPC is maintained, as a remedy in the context of the wholesale markets' regulation. OTE views that ex-ante price control of its retail services should be re-examined to reflect the market dynamics and competition in the retail markets.

OTE, according to relevant HTPC decision, issued in May 2020, has Significant Market Power and is subject to regulatory obligations in the wholesale high-quality access market (M4/2014) and in the market of wholesale trunk segments of leased lines (M14/2003). OTE's wholesale call termination rates are defined by EETT in line with the EU Regulation setting single maximum Union-wide voice termination rates.

The Regulatory Litigations for 2021 refers to relevant actions for OTE, COSMOTE and Telecom Romania Mobile Communications.

With regard to OTE there were 0 number of fines, appeals and non-pecuniary penalties resulting in €0 Cost of fines.

Concerning COSMOTE there were 0 number of fines, 1 appeals and 0 non-pecuniary penalties, resulting in €0 Cost of fines.

Telekom Romania Mobile Communications reported in the regulatory field 8 fines, 1 appeal and 2 non-pecuniary penalties, with the cost of fines amounting to €168,745.

**Contribution, Formulation and Operation of a Responsible Market**

The new telecommunication technologies are critical for future economic growth, social welfare and sustainability. In this framework, the Group plays an important role in sector-specific and multi-stakeholder forums, associations and initiatives, at national and EU level, in order to enhance responsible competition, self-regulation and cooperation on social welfare.

The Group's objective is the promotion of a fair regulatory environment which ensures a level-playing field and regulatory predictability for investments, as well as the creation of a positive environment and the establishment of trusting relationships. The Group's positions on electronic communications at national and EU level, as well as its commercial, financial and regulatory strategy, are communicated to stakeholders.

The Chief Legal and Regulatory Affairs Officer of OTE Group is responsible for shaping the strategy for ensuring a fair regulatory environment.

OTE is registered in the EU Transparency Register and thus has committed to comply with the Transparency Register Code of Conduct.



## 3.9 Human Rights Management



IN 2018, THE GROUP  
ADOPTED THE CODE OF  
HUMAN RIGHTS AND  
SOCIAL PRINCIPLES

in which it recognizes its responsibility to respect  
internationally recognized human and social rights.

The integrated approach to managing human rights is based on the United Nations Principles and Guidelines for Business and Human Rights and is aligned with the approach of the Deutsche Telekom Group.

Also, the **OTE Group Code of Conduct** includes basic rules of conduct, principles and values, such as equality, respect for diversity, trust, credibility, integrity, morality, transparency, personal responsibility. These rules establish a model of operation and lead to the adoption of a common "Corporate Culture".

3. GOVERNANCE | 3.9 HUMAN RIGHTS MANAGEMENT

Amongst others, the Group:

- Respects the right to freedom of expression.
- Protects the confidentiality of data.
- Operates in accordance with the legal framework currently in force (see section [Security and Data Privacy](#)).

Particular attention is paid to the rights of its employees, freedom of association and collective bargaining, diversity and equal opportunities (see section [Fair Employment Policy Framework and Equal Opportunities](#)). The Group declares that it is in favour of banning all forms of forced labour and strives to abolish child labour.

In 2018, the Group strengthened its efforts, by developing and implementing a Human Rights' Action Plan. Since then, the Human Rights Due Diligence Programme has been developed. Human Rights Risk and Impact analysis was conducted according to the ERM Methodology, and included: risk mapping, potential risk scenarios, the likelihood of risk occurrence, the main business aspects impacted, implemented measures and proposed measures. The Human Rights Risk and Impact analysis was initiated in the fourth quarter of 2018 and was successfully completed in 2019 for all OTE Group Companies. The areas/business activities that were subject to Reviews in the value chain were the following: Human Rights Management in Business, Employees' Human Rights Management, Labour Management Relations and Human Rights, Employees' Health/Safety and Wellness, Suppliers' Human Rights Management, Privacy (Customers / Employees) and Freedom of Expression and Customers' Health and Safety. The Human Rights

Risk and Impact analysis was again initiated, for all OTE Group Companies, at the end of December 2021 and will be finalized during the first quarter of 2022. The group that has been assessed so far is the employees while the assessment of the suppliers is in progress.

Furthermore, to ensure compliance with the provisions of the Human Rights and Social Principles, OTE Group companies are surveyed annually via an automated tool. The managing directors or HR managers confirmed, by signing the respective Statements, that there were no violations of the Code during 2021. This year, special reference was made to the [OTE Group Diversity, Equity and Inclusion Policy](#).

In the context of taking action to prevent and mitigate negative impacts from possible Human Rights violations in the company, a dedicated Human Rights e-learning was conducted during 2021, mandatory Compliance trainings which include Human Rights topics are annually offered and an annual awareness campaign has been launched (see below).

Moreover, considering that the diffusion of key values and standards in the supply chain is an important feature of responsible business conduct, an awareness raising communication on both Compliance and Human Rights topics was addressed to all major OTE Group business partners (in total 260 business partners), at the end of 2019 and beginning of 2020. The awareness communication is to be repeated during 2022. In order to protect Human Rights, even beyond the limits of its own operation, all suppliers are asked to respect and safeguard

Human Rights by integrating relevant requirements into contracts with suppliers. Additionally, Deutsche Telekom participates in the CFSI initiative (Conflict-Free Sourcing Initiative), to prevent the use of conflict minerals.

In 2020, as part of OTE Group's Materiality Analysis, the Group's stakeholders were involved and identified Human Rights as a significant issue, therefore recognising that the responsibility to respect and protect Human Rights should be instilled among the Group's strategic targets and efforts. The re- evaluation of the Materiality Analysis results which has taken place in 2021, by the OTE Group Compliance, Enterprise Risks and Corporate Governance Committee (GRC Committee), did not affect the Human Rights issue importance. Examples of Human Rights topics assessed within the company and its supply chain during the Materiality Analysis were the following: Non-discrimination, Freedom of Association and Collective Bargaining, Child Labor, Forced or Compulsory Labor, Security personnel's awareness of Human Rights, Employees' awareness of Human Rights and Conflicts Minerals.

OTE Group is committed to fulfilling its Human Rights responsibilities. To this end, on May 2019 the Greek Diversity Charter, a European Commission initiative to promote Diversity and Equal Opportunities in the workplace, was launched and OTE Group was a founding member. This collaboration constitutes an inspiration, commitment and at the same time development of actions in order to create an inclusive work environment open to all.



In 2021, for the first time OTE Group participated in the 1st Diversity Month (May 2021), and through a communication campaign, our employees became acquainted with the principles of Diversity, Equity and Inclusion.

The Executive Director Compliance, Enterprise Risk Management and Insurance OTE Group is designated as the Officer responsible for managing Human Rights issues. Any Human Rights inquiries or complaints/tip-offs are addressed to the existing [Compliance communication channels](#). For any other issues related to the Code of Human Rights and Social Principles, the [humanrights@ote.gr](mailto:humanrights@ote.gr) channel is also available. In the same direction, the OTE Group Sustainability Policy refers to the Human Rights issues, according to the provisions of the Code of Human Rights and Social Principles.

Relevant [web page](#)



0

**TOLERANCE**

On the International Human Rights Day, OTE Group launched an internal campaign focused on Zero Tolerance to Human Rights Violations, the Code of Human Rights and Social Principles and the new **OTE Group Diversity, Equity and Inclusion Policy** which was adopted on August 2021.

744

**OTE GROUP EMPLOYEES' QUERIES**

were received through the "Ask Me" process. The categories of inquiries were about, but not limited to sponsorship/donation approvals, conflicts of interest, secondary employment and accepting/offering benefits. None of the questions was related to discrimination issues.

1,813

**EMPLOYEES**

(as these are mentioned in the relevant Table on Trainings of section Compliance Management) **participated in the Compliance trainings** ("Welcome on Board" program, "Customer Care induction" program and digital classroom trainings) and were trained in aspects concerning Human Rights, considering that OTE Group Code of Human Rights and Social Principles along with Policies concerning Human Rights are also included in all Compliance training material.

34

**COMPLAINTS WERE FILED VIA "TELL ME" CHANNELS**

channels by employees. Indicatively, eleven (11) tip-offs concerned allegations of improper behaviour. Following relevant investigations by the OTE Group Compliance office, the appropriate procedures were applied.

476

**EMPLOYEES**

participated in an **e-learning program dedicated to Human Rights** issues, which has started for the first time at Group level in December 2020 and continued throughout 2021. The e-learning program is expected to continue to run throughout 2022, also including CTS & COSMOTE e-Value employees.

100%

**OF SIGNIFICANT INVESTMENT AGREEMENT/CONTRACTS**

that were concluded during 2021 included a Human Rights clause. The above-mentioned agreements were identified as significant, due to the contract amount and objective, which is related to critical corporate functions, the service of strategic goals, as well as the health and safety of the employees of the Group's companies.

0

**CONVICTIONS****NO CONVICTIONS WERE ISSUED AGAINST OTE GROUP**

by the judiciary authorities concerning any discrimination in the workplace. In addition, there was no financial or non-pecuniary penalty imposed with regards to the violation of human rights issues.

## 3.10 Responsible Purchasing and Supply Chain Management

OTE Group believes that the diffusion of key values and standards in the supply chain is an important feature of responsible business conduct.

### Procurement Policy

All procurement practices are carried out according to the OTE Group Procurement Policy, which sets out all the terms and regulations under which purchases of products, materials/equipment, services or works by vendors (suppliers) are made. The main objectives of the Procurement Policy are:

- Optimization of value added in terms of cost, quality and time.
- Ensuring transparency.
- Compliance with Deutsche Telekom's International Procurement Policy.

The Procurement Policy does not distinguish between local and non-local suppliers. However, it is common practice for the Group Companies to support domestic suppliers.

OTE Group Companies aim to reimburse their suppliers, as defined in their procurement contracts, in due time. For 2021, the payment time ranged from 0 (immediate) to 120 days, depending on the type and value of the procurement.

### Supply Chain

The development and maintenance of a value-added supply chain for the Group, with economic, environmental and socially responsible methods and practices, in line with the Group's vision, is a continuous target for improvement.

All lists of suppliers (Vendor Register) have been renewed. For instance, in 2021, the list consisted of:

- 1,075 suppliers for OTE
- 540 for COSMOTE
- 169 for GERMANOS
- 69 for COSMOTE E-Value
- 106 for CTS and
- 270 for Telekom Romania Mobile Communications<sup>1</sup>.

The lists include both multinational and local companies for the purchase of materials and equipment or for the provision/lease of services. Moreover, all OTE Group suppliers directly supply goods, materials or services (i.e. "Tier 1" suppliers) to OTE Group since the latter has the contractual relationship with these suppliers and not with their subcontractors (if any). All existing OTE Group suppliers as well as suppliers wishing to cooperate with OTE Group in the procurement of materials / services must register in the Supplier Register tool and accept the provisions of the **OTE Group Supplier Code of Conduct**.



### SUPPLY CHAIN COVID-19 RESPONSE

Due to the COVID-19 pandemic, the supply of devices/equipment incurred minor disruptions.

Risk assessments were performed focusing on potential stock shortages. For business continuity reasons, preparedness plans were drawn, additional measures were applied in order to ensure products availability and relevant communication to the vendors was undertaken. Stock levels increased in critical commodities whose production was influenced by the pandemic. A Dual Vendor policy was introduced to safeguard critical commodities.

As far as the labor related services are concerned, additional control points were introduced in order to confirm the vendors' compliance with the measures against COVID-19 (masks in the premises, distances, etc).

New suppliers were quickly introduced to cover high demand in categories related to COVID-19 prevention equipment, such as masks, gloves and antiseptic gel.

1. Vendors that are common for more than one companies and have been counted separately for each Company.

## 3. GOVERNANCE | 3.10 RESPONSIBLE PURCHASING AND SUPPLY CHAIN MANAGEMENT

### Supplier Selection

Specific criteria related to corporate responsibility and sustainability can be added to each procurement notice, in accordance with the specifications required and defined by the business unit that initiates the procurement process. All prospective suppliers are required to declare that they explicitly agree with the **OTE Group Supplier Code of Conduct**, which reflects the intention of the OTE Group companies to collaborate with socially and environmentally responsible suppliers. This intention of the Group is reinforced by the **OTE Group Code of Human Rights and Social Principles**.

Legal documents of prospective suppliers are reviewed during the procurement process and prior to contract signing in order to determine prospective suppliers' good legal standing and solvency.

The contract (or the Purchase Order Terms), which contractors sign, includes special clauses on health and safety issues, environmental compliance, anti-corruption, security and confidentiality. In addition, signing the contract (or the Purchase Order Terms), obliges the contractors to comply with the **OTE Group Supplier Code of Conduct**, **OTE Group Code of Conduct** and **OTE Group Code on Human Rights and Social Principles**.

All the above are mandatory for the business cooperation with the Group.

#### % OF PROCUREMENT FROM DOMESTIC SUPPLIERS

GREECE

82.6%

ROMANIA

79.6%

### Supplier Evaluation

OTE Group active suppliers are evaluated on a yearly basis. Suppliers are selected based on the purchase orders issued within a 12-month period. More specifically, in 2021, the selection of suppliers for evaluation was based on all orders issued between 1/10/2019 - 30/9/2020, on behalf of OTE, COSMOTE, GERMANOS, Rural North, Rural South, COSMOTE e-Value SA, e-Value Ltd, e-Value International and Telekom Romania Mobile Communications.

#### INTEGRITY CHECK AND COMPLIANCE BUSINESS ASSESSMENT OF PROSPECTIVE SUPPLIERS



1,538

**INTEGRITY CHECKS**

OF SUPPLIERS, CONSULTANTS AND PARTNERS.

100%

OF PROSPECTIVE SUPPLIERS -FOR ALL PURCHASES EQUAL OR EXCEEDING €200,000 FOR OTE, COSMOTE, GERMANOS, CTS AND COSMOTE-VALUE, AND €10,000 FOR TELEKOM ROMANIA MOBILE COMMUNICATIONS WERE REVIEWED AND CHECKED, UNLESS THEY HAD BEEN CHECKED WITHIN THE LAST 2 YEARS.

100%

OF PROSPECTIVE CONSULTANTS WERE CHECKED, REGARDLESS OF THE PURCHASE VALUE, UNLESS THEY HAD BEEN CHECKED WITHIN THE LAST 2 YEARS (THIS APPLIES TO OTE, COSMOTE, GERMANOS, CTS AND COSMOTE-VALUE).



## 3. GOVERNANCE | 3.10 RESPONSIBLE PURCHASING AND SUPPLY CHAIN MANAGEMENT

Supplier evaluation included:

- All suppliers with orders of more than €2m (for all the companies mentioned above).
- All suppliers providing important types of supply (i.e. products and services that have a significant effect on the products and services provided to customers) worth over €500,000.
- All suppliers of products/services related to the Group Consolidated Management System, and
- Certain suppliers who did not meet the above criteria but were proposed for evaluation.

Suppliers evaluated are asked to complete a self-assessment questionnaire on their performance regarding sustainability issues. This questionnaire aims to promote awareness of social and corporate responsibility. It includes questions related to corporate responsibility, sustainable development, employment, human rights, environment, health and safety, quality and business continuity. Questions refer to the suppliers' performance, as well as to their suppliers' and sub-contractors' performance.

During 2020, supplier evaluation for the largest 3 OTE Group Companies is as follows:

- OTE evaluated 184 suppliers with an annual procurement value of 88.75%.
- COSMOTE in turn evaluated 128 suppliers amounting to 92% of the annual procurement value.
- Telekom Romania Mobile Communications evaluated 48 suppliers resulting in 82.36% of the annual procurement value.

### Classification and Development of Suppliers

The ratings of suppliers by the Company's operational units involved in the process, as well as the self-assessment questionnaires completed by the suppliers, feed the Supplier's Vendor Evaluation System to produce a quantitative performance score for each supplier. The performance of each vendor on corporate responsibility and sustainability issues corresponds to 10% of the total score. The results of the ranking are presented to the Group's Management.

For low-rated suppliers, Management decides whether they should remain on the Group's list of eligible suppliers, whether they need to show improvement in their performance (in which case some remedial action plans need to be agreed with the suppliers), or for the collaboration with the Group to cease (where upon the relevant Directorates of the Group are informed).

In addition, the Group takes into account the results of Deutsche Telekom's assessments and audits for each joint vendor in the framework of the /Eco Vadis/self-assessments and JAC (Joint Audit Cooperation).

It should be noted that OTE Group has established specific communication channels (e.g. emails: [whistleblowing@ote.gr](mailto:whistleblowing@ote.gr) or [tellme@compliance@ote.gr](mailto:tellme@compliance@ote.gr), P.O. box, regular post and telephone line) to enable everyone to submit information concerning possible violations of legal obligations or internal policies and regulations. It is also possible to file a report anonymously via the Electronic Compliance Form. Any information provided is treated as strictly confidential and is checked for plausibility by specially trained

employees who are obligated to confidentiality.

Finally, the **OTE Group Supplier Code of Conduct** sets the framework for social, environmental and compliance audits. Monitoring activities on the supplier and its subcontractors are conducted to effectively evaluate the suppliers' and subcontractors' actual conformity with the Code's Principles. This includes the right for OTE Group and/or its authorized representative to perform audits, including on-site inspections and carry out questionnaires and/or interviews with selected employees at supplier's premises, construction sites and/or other locations where work is performed on behalf of the supplier. The supplier acknowledges that OTE Group has the right to request and receive further information (e.g. through the OTE Group evaluation systems), if deemed necessary. If any non-conformity with the Principles is notified to OTE Group, the supplier or subcontractor bears the obligation to cooperate and provide to the authorized representative of OTE Group with all necessary information and, subsequently a dedicated improvement plan has to be filed to be implemented in due course.



Relevant [web page](#)

## 3.11 Security and Data Privacy

### WHY IT MATTERS

Maintaining and enhancing customers' trust is hugely important for the success of OTE Group. Business Security and Data Privacy are fundamental for this purpose.

### Business Security and Data Privacy

Business security and data privacy are more than just an obligation to comply with legal and regulatory requirements and are heavily reflected in the quality of the Group's services.

Business security and data privacy are subject to the Binding Corporate Rules Privacy (BCRP) of Deutsche Telekom Group and the Group Security Policy. BCRP contains the basic principles regarding the protection of customers', employees', and associates' personal data, according to the data protection legislation. BCRP is binding with regard to the processing of personal data, applies to all types of personal data processing, and defines the information life cycle practices (collection, usage, retention, transfer). OTE and COSMOTE process customer data for secondary purposes, according to the legislation. Relevant information is provided to the customers in the respective data privacy notices. For example, customer furtherservice

improvement purposes, in order to draw useful statistical conclusions on the use of the services and the level of the customer service. Data are processed for commercial purposes (customer profiling) subject to specific consent of the customers, who can revoke at any time. Customer profiling enables the formulation and communication of personalized offers that best meet customers' preferences and interests. The Group Security Policy meets the compliance and security requirements of Deutsche Telekom Group and applicable regulatory frameworks.

The Group Data Privacy Officer (DPO) reports to the highest level of management and is oversighted by the Audit Committee, which constitutes a Committee of the Company's Board of Directors (BoD). The DPO is responsible for advising the individual organizational units of the Company on the statutory and internal requirements for data privacy, monitoring compliance with data privacy requirements, and raising awareness on data protection. The DPO provides quarterly reporting on data privacy status to the Audit Committee.

The Group Security Officer reports to the CEO and is responsible for driving the security strategy and overseeing the security program and initiatives. Security program management is an ongoing requirement, which serves to protect the organization's information assets, address and mitigate risk, meet regulatory obligations and minimize potential legal exposures, while providing opportunities to support business directions and maximize value to the

stakeholders. It embeds good security practices into business processes, establishes awareness training programs, and places particular emphasis on managing risk as a continuous process. Risk is assessed in the light of changing threats and new or enhanced controls are designed and implemented to tackle these threats, enabling the organization to focus the security activities on issues that have the greatest significance and impact. Proactive approach to assessing and monitoring risk, detection, timely and proper response to events, in alignment with security laws and regulations, is integral part of the organization's security program. A culture of continuous improvement is in place, raising recommendations or further mitigations, where necessary, to ensure the organization's layered controls are operating effectively. Methodologies and standards, such as ISO/IEC 27001 and 27002, Capability Maturity Model, publications from the National Institute of Standards and Technology (NIST) and the European Union Agency for Cybersecurity (ENISA) are also utilized to gauge comprehensiveness.

Staying ahead of the curve in responding to unconventional cyber threats, the Security Operations Center operates on a 24/7 basis. The networks and telecommunication infrastructure are constantly being monitored, by analyzing and searching for unusual activity or vulnerabilities that could be indicative of a compromise. In such case, the expert personnel overseeing the security operations, ensure that a potential event will be promptly identified, analyzed, responded to, and reported, within the Group risk tolerance level.

The adopted Privacy and Security Assessment framework is the cornerstone for performing Data Privacy Impact Assessments and ensuring the implementation of security and privacy requirements on a risk-based approach. In 2021, the Privacy and Security Assessment (PSA) was re-executed for 63 critical systems and completed for 50 new systems/projects.

OTE and COSMOTE apply an enterprise information security management system according to ISO/IEC 27001:2013 requirements, certified, on an annual basis from an independent body. In 2021, the scope was expanded to ISO 27701 which covers the Privacy Information Management System. The ISO27001 certification includes, amongst others, a set of different activities and tests (e.g. security risk assessments, vulnerability assessments and penetration tests, etc.) as they are part of the control statements being audited.

Customers communicate their data subject requests to a dedicated channel established for every Company. In 2021, OTE and COSMOTE handled 1,435 data subject requests, while Telekom Romania Mobile handled 828 requests.

OTE and COSMOTE investigated 6 customer requests, regarding confidentiality of communications/security of customer data, and 35 complaints from the Hellenic Authority for Communications Security and Privacy (ADAΕ). In none of these cases, any suspected finding was detected. OTE and COSMOTE also handled 15 complaints that were submitted to the Hellenic Data Protection Authority (DPA).

3. GOVERNANCE | 3.11 SECURITY AND DATA PRIVACY

Compliance monitoring activities are critical to ensure compliance within the data privacy and security framework. Security, data privacy, and internal audit functions perform audits and assessments, covering data privacy and security areas.

Compliance monitoring activities included among others:

- Organizational privacy assessments in subsidiaries (OTE SAT, OTE Globe, and e-Value).
- Assessment for big data system regarding data retention & anonymization process.
- Review & update of General Data Privacy Notice for OTE and COSMOTE.
- Data Privacy Notice (DPN) availability assessment for sites and aps.
- User access rights review and certification.
- Verification of access to communications data. In 2021, 177,261 (approximately 100%) authorized user accesses in data processing systems were checked.

Moreover, other relevant data privacy projects /activities that took place include:

- Implementation of Consent management platform.
- Development of new security and privacy risk management framework.
- Planning of a 2nd phase of the Schrems II project that covers the fulfillment of EDPB Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data and the transition to the new Standard Contractual Clauses.
- Review of more than 368 Commissioned Data

Processing Agreements (CDPAs).

- Conducting external audit for ISO 27701 for OTE, COSMOTE, and CTS.
- Provision of consultation on data protection issues for more than 182 internal and ICT projects/requests.

Aiming at continuous improvement on the level of security, OTE and COSMOTE carried out the following actions:

- Ongoing project for the redesign and replacement of the entire infrastructure (core MS Windows Domains).
- Expanded the Mobile Device Management Platforms, by covering S/MIME certificate delivery as well as remote access for core applications.
- Deployment of a Privileged Account Management (PAM) tool covering the entire OTE-COSMOTE IT infrastructure.
- Deployed MS LAPS solution across user domain.
- Participated in national and international cyber-attack defense exercises.
- Ongoing project for redesign and upgrade of the Identity Management System.
- Ongoing project for security performance management and third-party risk management.
- Security self-assessments carried out for OTE, COSMOTE, COSMOTE e-Value, and CTS.
- Revised the Privacy and Security Risk Management framework.

Timely response to security incidents is paramount for OTE Group. A security and privacy hotline is in place to support employees in reporting any security and privacy-related incidents to the Security Operations Center. In

2021, OTE and COSMOTE reported 37 incidents to the DPA and the ADAE, by adhering to GDPR and L.3471/2011 for the protection of personal data and privacy in the electronic telecommunications sector. Many of those incidents were classified as low-risk incidents.

In addition, OTE, COSMOTE, and Telekom Romania Mobile Communications successfully had their Information Security Management Systems recertified according to ISO 27001 requirements.

Based on the existing legislation, all Group companies process privacy waiving requests to the judicial and police authorities provided that they present the required legal orders.

Every year since 2016, OTE, COSMOTE, and Telekom Romania Mobile have been publishing data regarding the type and amount of information disclosed to security agencies in the **transparency report**.

In Greece, the legal basis for processing requests of lawful interception and data provisioning is Article 19 of the Greek Constitution (Law 3115/2003 on the Establishment of ADAE, Presidential Decree 47/2005 on the Procedures, Technical and Organizational Guarantees for the confidentiality of communications, Law 2225/1994 and Law 3917/2011.

Specifically, in 2021, OTE and COSMOTE processed requests for:

- Lawful interception on 7,184 telephone lines.
- Provisioning of:
  - External communication data on 12,863 telephone numbers,
  - Subscribers' personal data from 12,000

telephone numbers,

- Subscriber personal information from 3,022 IP addresses.

These requests are forwarded to ADAE, who in turn includes them in its Annual Activity Report.



3. GOVERNANCE | 3.11 SECURITY AND DATA PRIVACY

**Physical Security**

Physical security is the protection of personnel, hardware, software, networks, and data from physical actions and events that could cause serious loss or damage to an enterprise. In that respect, the following actions were implemented in 2021:

**Security Hardening**

- New Access Control System for KV/Cabinets: Approximately another 6,000 installations of the new access control system took place raising the total amount of sites monitored by the new system to around 26,000.
- Marousi HQ security redesign/hardening due to extensive building renovation – phase A.
- “Agia Paraskevi” security redesign/enhancement after renovation to host Cosmote E-Value personnel & services.
- Security enhancement (structural/electronic) at 25 buildings, 6 shops, and 10 base stations.

**Guarding services and Cash safe/CIT**

- Cash Safe: Successful rollout and operation of new agreements for Cash Safe and CIT services (more than 70% Operating Expenditure –OPEX- reduction compared to the previous contract).

**Systems, Integration, and Process Improvement**

- COVID Checks: Integration between Human Resources and Access Control Systems for the automation of the Covid-19 certificates verification via access cards to reduce queuing and manual scanning at the entry gates of the main buildings.

- Expansion of centralized VMS/CCTV remote supervision and management for critical locations.
- Expansion of the custom intermediate security database (iDB):
  - Design and implementation of a new module for the management and invoicing of guarding services.
  - Design and implementation of a new module for shops security management.

**Security and Data Privacy Awareness and Training**

In 2021, awareness and training programs were carried out on Information Security, Data Privacy, and Physical Security topics, and included:

- Briefing regarding Physical Security, Information Security, and Data Privacy during the introductory training of all newly recruited employees.
- Briefing guidelines regarding Physical Security, Information Security, and Data Privacy delivered to all newly insourced and outsourced employees.
- “Commitment to Data and Information Protection 2021” E-learning, delivered to all employees.
- Physical Security Training and Difficult customer handling via Saba platform delivered to shop employees.
- Awareness material for data protection guidelines during working from home addressed to all employees
- Short Security awareness videos on different cybersecurity topics such as Passwords,



- Phishing, Man-In-The-Middle attacks, Ransomware, Over-sharing/safe media, Safe Use of Mobile and Portable Storage Devices, Insider Threat, Physical Access, Documents’ Disposal, Clean Desk Policy, Cloud Sharing delivered to all employees
- Customized data privacy e-learning training for customer service, shop employees, and field technicians.
- Privacy and Security Assessment training to specific commercial and technical groups.
- Data Protection Awareness delivered to targeted groups.
- NITAI – Network and IT Architecture Inventory awareness delivered to targeted groups.

- Special Data Privacy and Information security awareness campaign addressed to all employees. Informing them on:
  - Rules for the Extraction of Personal Data from IT / NT systems.
  - Rules for the Proper Use of Communication Media, Systems, Access & Control of Corporate Computers.
- Education of employees on the classification of emails and MS Office files.
- Implementation of an electronic survey related to Business Security and Continuity issues, that was addressed to a sample of employees to improve OTE Group’s security practices.

## 3. GOVERNANCE | 3.11 SECURITY AND DATA PRIVACY



- Issuing articles in OTE Group newsletters and Intranet (myNet and YaM). Relevant articles and useful guidelines were posted or updated to strengthen security awareness.
- Data Privacy Day Quiz.
- Commitment to data privacy and information protection training (e-learning – 8,857 participants).
- Awareness campaign regarding rules for the handling of data exports and rules for acceptable use of systems and communication means.
- PSA training sessions for IT and NT.
- Focused data protection awareness sessions for various departments.

### GREECE

#### SIGNIFICANT DATA 2021

**112**

physical security incidents were recorded and managed, 65 of which referred to Base Stations, 31 to KVs, 8 to buildings, 4 to shops, and 4 others (for example, fire in a service vehicle).

**3,474**

access control cards were issued.

**4,217**

entrance permits to OTE Group Premises were issued.

**4,014**

requests for access rights were processed.

**1,350** keys and **9,840** access rights for the new access control system at KV/Cabs were processed.

 **160**

Access Rights by mobile (mynetGo app) were processed

**975,743**

alarms in outdoor connection cabinets and cabins, and 28 events-personal protection were managed.

**120**

checks of guarding stations and buildings, 160 preventive checks for the detection of explosives were conducted.

**28**

inspections in Group stores nationwide, 320 checks of premises and 14 checks of vehicles for privacy assurance, 35 retrievals of stores' Closed-Circuit TV of video surveillance recordings (CCTV), 393 studies of physical safety in stores and emergency security guards in 187 stores due to COVID-19 were performed.

**20**

building retrievals of Closed-Circuit TV of video surveillance recordings (CCTV) were performed.



### ROMANIA

#### SIGNIFICANT DATA 2021

**0**

physical security incidents were recorded<sup>1</sup>

**592**

access control cards and 2 corporate badges were issued<sup>1</sup>

**36**

physical security risk assessments were carried out.

**5**

on-site physical security inspection visits were performed.

**1,219**

data subject requests were handled.

1. Since October 1<sup>st</sup>, 2021



## 3.12 Business Continuity



### CUSTOMERS REQUIRE UNINTERRUPTED HIGH-QUALITY PRODUCTS AND SERVICES PROVISION.

OTE Group strives for high caliber Customer Experience and invests in the development of mechanisms for the timely recognition and treatment of incidents that affect or are likely to affect the business continuity of critical Products and Services.

OTE Group aims to achieve a maximum degree of resilience and ability to cope with adverse and extraordinary circumstances, to ensure the uninterrupted provision of quality products and services. For 2021, the System average interruption frequency was approximately 0.147 times per month and the customer average interruption duration was estimated to about 6.2 minutes.

The sweeping passage of the Covid-19 pandemic and the lockdowns of the last 2 years have left a strong imprint in all areas of business activity.

These unprecedented conditions underlined the importance of Business Continuity to ensure the resilience within organizations and society in general.

OTE Group Business Continuity team in close cooperation with Incident Directors and all involved business units, including our Subsidiaries, responded effectively to the challenging demands set by the state and Deutsche Telekom (DT), enhancing Business Continuity Management (BCM) culture in OTE Group. The Business Continuity team of OTE Group implemented the operational

plans that ensured the uninterrupted operation of the OTE Group and continue to adjust them according to the conditions of the pandemic and the state instructions.

Today, OTE Group operates fully adapted to the new regularity and has successfully adjusted its operational models by rapidly incorporating the

principles of Business Continuity Management into its business culture. Both Covid-19 containment guidelines set by the state and remote work (“work from home”) have been seamlessly integrated into daily operation, allowing the same or in some cases higher levels of productivity than in the pre-pandemic period.

## 3. GOVERNANCE | 3.12 BUSINESS CONTINUITY

In 2021, Group Companies successfully had their Business Continuity Management Systems recertified according to ISO 22301:2019 requirements.

Other major achievements in 2021 include:

- Technology hardening and network expansion to accommodate telecommunication needs during the pandemic.
- Public safety communication campaigns with the use of Cell Broadcast Service.
- Collaboration with the General Secretariat for Civil Protection.
- Update of all Business Continuity Plans to cover the critical processes of all key COSMOTE products and services.
- Digital validation, testing, and exercise of all Business Continuity Plans.
- Update of Disaster Recovery Plans by IT and Network to reflect existing and new technologies.
- Continuous development of an automated and structural methodology for Network Impact Analysis. The sustainability and environmental constraints during the development of the aforementioned methodology were considered.
- Enhancements on fire protection measures for critical Telecommunication Data Centers. Automated controls have already been put in place.
- Design and development of fully customized evacuation plans for most Critical Buildings all over Greece.
- Implementation of risk assessment studies in critical services - either for COSMOTE or its ICT Customers - and critical buildings all over Greece.

COSMOTE has designed and implemented its network exercising geo diversity across its

operational region for its critical network infrastructures, utilizing cloud based technologies and high availability nodes.

Critical telecommunication and electronic services run uninterrupted during disaster events. A number of resilient infrastructure is also available to be utilized:

#### Network Power Generators (COSMOTE Network)

- Fixed Network: ~ 1600.
- Mobile Network: ~800.

#### Mobile Generators (On Demand)

- 3 Signed agreements with external providers for Mobile Generator Services. (Provision + Installation).

#### Extra Battery Backup for Access Network

- 16106 DSLAM Cabinets with battery Backup (Q4 2021).
- Extensive Power Plan with Base Station Battery Autonomy based on predefined criteria.

#### Power in Critical Buildings

Extensive Power Plan for 108 Critical Telecom Buildings:

- 1 Transmission Shelter on wheels (TRN).
- 3 Mobile BTS's for mobile access networks recovery.
- 2 Mobile Vans for fixed network recovery.
- 1 Tetra Van
- 2 Predefined Locations to be used as (Technology Network Crisis Room)
- Multiple NOC's across Greece for Network Incidents handling (Virtual Teams available).
- 2 Terrestrial Satellite Teleports ( Act-Act Operation).



### IN 2021, THROUGH THE GROUP REPORTING BUSINESS CONTINUITY INCIDENTS PROCESS:

**24** EVENTS OF BUSINESS CONTINUITY WERE EVALUATED.

**8** POTENTIAL AND MINOR EVENTS, WHICH COULD HAVE IMPACTED THE GROUP'S BUSINESS CONTINUITY, WERE INVESTIGATED.

**3** OUTBOUND NOTIFICATIONS WERE SENT TO DEUTSCHE TELEKOM'S SITUATION CENTER.

**86** SMS NOTIFICATIONS WERE SENT INTERNALLY TO TARGETED GROUPS PROVIDING INFORMATION ABOUT BUSINESS CONTINUITY INCIDENTS.

## 3. GOVERNANCE | 3.12 BUSINESS CONTINUITY

## Awareness and Training

.....

In 2021, several awareness and training programs were carried out that, among others, included:

- Briefing regarding Business Continuity during the introductory training of all newly recruited employees.
- Communication Campaign Newsletter and Intranet (myNet and YaM) presence about Business Continuity Awareness Week to raise awareness of the resilience and demonstrate the value and significance of effective Business Continuity Management to the organization. This year's theme was "Business Continuity Starts with You" and focused on the idea that business continuity is not just a plan, but a collaborative process that involves everyone within an organization. This message was reinforced by a quiz following the campaign, about how Business Continuity relates to the actions

employees should take during the pandemic, to contribute to the continuation of business operations under adverse conditions.

- Issuing articles in OTE Group newsletters and Intranet (myNet and YaM), to strengthen the Group's business continuity awareness.
- On-site and remote awareness sessions in OTE Group Shops, about Information Security and Data Privacy Issues. Particular attention was paid to an interdepartmental cooperative action on Physical Safety issues in store emergencies (e.g. robbery, involvement, etc.), with the collaboration of a specialist psychologist. The aim was to inform employees about practices related to effective dealing with difficult clients at work.

Participation in the Electronic Awareness Survey organized by DT, which is conducted every 2 years to demonstrate the level of awareness and clarify strategic awareness goals.



## 3.13 Integrated Management System

### THE INTEGRATED MANAGEMENT SYSTEM (IMS) IS BASED ON THE CORPORATE PROCESS MODEL

and its systematic assessment, documentation, and improvement. The IMS comprises of certified management systems implemented within OTE Group, based on a multitude of international and national standards.

An overview of the certified PAS99 Integrated Management Systems (IMS) are depicted in the graph.

The OTE Group Management team is systematically informed by the Management Systems' representatives regarding the IMS' objectives, programs and actions.

For OTE and COSMOTE, the IMS, apart from ISO Certifications, also includes:

- ISAE 3402 Type 2 Report and ISAE 3000 Type 2 Report that are issued by an external Auditing Company in accordance with the instructions of the International Auditing and Assurance Standards Board. The goal of ISAE Reports is to help the Organization implement the necessary technical & organizational measures for the benefit of its customers, in order to protect the information and data it manages in the

provision of ICT services. While ISAE 3402 (SOC 1) focuses on the effectiveness of existing measures related to an organization's financial reporting, including IT General Controls, ISAE 3000 (SOC 2) focuses on Information Security and requirements are determined by any of the five Trust Services Criteria (AICPA TSP section 100) on Security, Availability, Integrity, Confidentiality and Privacy.

- Authorized approval from the Greek Defense Ministry according to Regulation of Industrial Safety, ("Government Gazette B 336 - 16.03.2005") and
- Attestation according to the Principles and Guidelines for Good Distribution Practice of Medical Devices (Decision No. 1348/04 of the Greek Ministry for Health and Welfare), which also applies to GERMANOS.

Existing certifications, their expansion and any new certifications demonstrate OTE Group's continuous efforts to implement international standards and practices.

An overview of the available certifications for the largest companies of OTE Group is depicted in the [Appendix](#).



Relevant [web page](#)

#### PAS99 INTEGRATED MANAGEMENT SYSTEMS





2021

INTEGRATED REPORT

# Appendix



# 2021 Performance

2021 GOALS	2021 PERFORMANCE
<b>Responsible Business</b>	
<p><b>OTE-COSMOTE:</b> Obtain Certification IDW PS 980 (anti-corruption area)</p> <p><b>OTE:</b> Participate at the “World’s Most Ethical Company Award”</p> <p><b>OTE:</b> Implement of Law 4706/2020 on compliance and risk management systems</p> <p><b>OTE Group-Greece:</b> Conduct human rights risk and impact analysis</p> <p><b>OTE Group:</b> Introduce new mandatory E-learnings on:</p> <ul style="list-style-type: none"> <li>• “Code of Conduct”</li> <li>• Risk Management Culture</li> </ul> <p><b>OTE Group:</b> Launch the new Risk Management tool (Corporater), where OTE Group plays a key role in its development and testing</p> <p><b>OTE-COSMOTE:</b> Become certified in accordance with the ISO 27701 management system</p> <p><b>OTE-COSMOTE:</b> Launch data privacy e-learning program</p> <p><b>OTE-COSMOTE-GERMANOS:</b> Implement the required changes and adjustments in the Business Continuity Management Systems (BCMS) in order to be certified in line with the ISO 22301: 2019 management standard</p>	<p><b>F</b> See <a href="#">Compliance Management</a></p> <p><b>F</b> See <a href="#">Compliance Management</a></p> <p><b>F</b> See <a href="#">Compliance Management</a></p> <p><b>IP</b> See <a href="#">Compliance Management</a></p> <p>The Human Rights Risk and Impact analysis was again initiated, for all OTE Group Companies, at the end of December 2021 and will be finalized in 2022.</p> <p><b>N</b> Due to other business needs, e-learning was not introduced in 2021 and is in scope for 2022.</p> <p><b>IP</b> See <a href="#">Compliance Management</a></p> <p>The 1st phase for Managers completed in 2021 and the 2nd phase for Employees will start in 2022.</p> <p><b>F</b> Implementation of the new Risk Management Tool TRMS (Telekom Risk Management Solution) for OTE Group and its affiliates (15 Risk Reports in total).</p> <p><b>F</b> See <a href="#">Security and Data Privacy</a></p> <p><b>F</b> See <a href="#">Security and Data Privacy</a></p> <p><b>F</b> Data privacy e-learning (commitment to data privacy and information protection training) was completed and 8,857 employees of OTE group companies participated.</p> <p>See <a href="#">Business Continuity</a></p> <p>In 2021, Group Companies successfully had their Business Continuity Management Systems recertified according to ISO 22301:2019 requirements.</p>
<b>Employees</b>	
<p><b>OTE Group - Greece:</b> 70% Digital Learning Quota YE 2021<sup>1</sup></p> <p><b>OTE-COSMOTE-CTS-GERMANOS:</b> Introduce Future Skill Management by 2022</p> <p><b>OTE-COSMOTE-CTS-GERMANOS:</b> Health rate up to 98% by 2021</p> <p><b>OTE-COSMOTE-CTS-GERMANOS:</b> Reduce the total number of work-related accidents (vs 2020)</p> <p><i>1. Goal rephrased in respect to 2020 Integrated Report in the interest of better understanding and accuracy</i></p>	<p><b>F</b> See <a href="#">Employee Training and Skills Development</a></p> <p><b>IP</b> See <a href="#">Employee Training and Skills Development</a></p> <p>In 2021 a new skill management process and tool have been prepared, to be announced within 2022.</p> <p><b>F</b> See <a href="#">Health and Safety</a> and <a href="#">Appendix</a>. The average health rate for 2021 was 98%.</p> <p><b>F</b> In 2021 the implementation of long-term Health and Safety training programs for safety at work continued. The total number of work-related accidents has been decreased per 21,12%, compared to the value of last year. Noted that, the number of accidents per company was adjusted according to the new distribution of employees. Another important reason for reducing occupational accidents is the reduced number of employees on premises due to teleworking which was up to 70% for some periods of time. Thus, the accidents during the arrival and departure but also during the working hours were significantly reduced.</p>

APPENDIX | 2021 PERFORMANCE

2021 GOALS	2021 PERFORMANCE
<b>Employees</b>	
<p>OTE-COSMOTE-GERMANOS-OTEGLOBE-COSMOTE E-Value-OTE Academy-CTS: 30% of all managerial positions to be held by women</p> <p>OTE Group - Greece: Introduction of Diversity Policy within OTE Group and promote a diverse and inclusive work environment for all, through targeted actions for all employees and leaders</p>	<p><b>F</b> See <a href="#">Employee Selection, Attracting and Retaining Talented Employees</a> 34% achieved for 2021.</p> <p><b>F</b> See <a href="#">Fair Employment Policy Framework and Equal Opportunities</a></p>
<b>Customers</b>	
<p>OTE-COSMOTE: Offer the capability to sell our services remotely through our digital channels, without physical human interaction</p> <p>OTE-COSMOTE: Increase Digital Self-Care Penetration in order to provide an interactive and effortless Customer Experience that would enable customers maximize the value they get from our products/services (customer success)</p>	<p><b>F</b> In 2021, critical projects were launched that offered a fully automated sales experience through digital channels (i.e. Cosmote Neo). Additionally digital on boarding functionalities were more than tripled during the year, enabling sales of products and services through physical remote channels, contributing to the elimination of paper usage and maximizing of digital customer experience</p> <p><b>F</b> In 2021, self-care capabilities in customer services increased in number covering aspects from the whole range of customer inquiries. Indicatively, in IVR more than 20 self-care services are available to customers while in AI Chatbot self-care services are more than 100. In MyCOSMOTE App more self-care functionalities were introduced that improved the channel's relevance as customer service point. App's growing importance for customer support is illustrated in the increased usage i.e. the number of landline technical checks performed through the app were tripled in 2021 (December 2020 vs December 2021). Development of self-care is an ongoing process that has provided significant results so far, nevertheless encompasses still great potential.</p>
<b>Society</b>	
<p>OTE: Develop 3 new Telecommunications museum's digital tools, and achieve 13,000 digital visits</p> <p>OTE-COSMOTE: &gt;3,000 technological solutions created by students (16-18 years old) based on community needs within the context of Panhellenic Robotics Competitions and STEM initiatives</p> <p>OTE-COSMOTE: &gt;16,000 people (students, teachers, trainers) will benefit from Educational Robotics Competitions, STEM initiatives and webinars (2020-2021)</p>	<p><b>P</b> The last digital tool (virtual tour) will be shortly completed and released. The delay is due to its further content enrichment</p> <p><b>N</b> Not achieved due to the special circumstances caused by the COVID in the last two years, which affected the rates of active participation in the Robotics competitions, as well as the implementation of new STEM initiatives</p> <p><b>F</b> Over-achievement of the target, since through STEM &amp; educational robotics more than 30,000 students and teachers were benefited. See <a href="#">Digital Inclusion for All</a></p>

APPENDIX | 2021 PERFORMANCE

2021 GOALS	2021 PERFORMANCE
<b>Climate and Environment</b>	
<p><b>OTE Group:</b> OTE Group, member of the DT Group, is committed to the achievement of DT Group-wide targets for the post-2020 period. Specifically, OTE Group is committed to achieve:</p> <ul style="list-style-type: none"> <li>• 100% use of renewable energy resources for electricity consumption from 2021 onwards</li> <li>• Net zero emissions from energy consumption by 2025, including up to 95% reduction of emissions from energy consumption by 2025 compared with 2017 (base year)</li> <li>• 25% reduction of indirect emissions (purchased goods and services, capital goods, and use of sold products, rented or leased equipment) per customer by 2030, compared with 2017 (base year)</li> <li>• Net zero carbon footprint by 2040</li> </ul>	<p><b>F</b> The RES target is fully achieved</p> <p><b>IP</b> See <a href="#">Energy and Climate Change</a></p>
<p><b>OTE Group:</b> Zero technology waste<sup>1</sup></p>	<p><b>F</b> See <a href="#">Circular Economy</a></p>
<p><b>OTE Group:</b> 100% use of FSC certified bags in retail network (Greece)</p>	<p><b>F</b> See <a href="#">Circular Economy</a></p>
<p><b>OTE-COSMOTE:</b> Minimization of single use plastic items (applicable to 7 main buildings with restaurants &amp; canteens, Greece):</p> <ul style="list-style-type: none"> <li>• Retain zero use of single use plastic bottles, cups and straws</li> <li>• Zero use of single use plastic cutleries and food containers</li> </ul>	<p><b>F</b> See <a href="#">Circular Economy</a></p>
<p><b>COSMOTE:</b> Installation of 3 additional EMF measurement stations</p>	<p><b>IP</b> See <a href="#">Electromagnetic Fields</a></p>

1.Sustainable management of waste generated from telecom & retail network, buildings and datacenters

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

# Accountability Principles Standard AA1000 Index

PRINCIPLE APPLIED	METHODS	REPORT LOCATION
Inclusivity	Identification of key stakeholders and dialogue to understand key issues	Sustainable Business Model / Stakeholder Management & Engagement / Additional Information for GRI Indicators / Corporate Governance Structure and Members / Sustainability Governance / Risks and Uncertainties for the Next Year / 2021 Performance
Materiality	Identification of issues which are important to the company and its stakeholders	Sustainable Business Model / Stakeholder Management & Engagement / Additional Information for GRI Indicators / Corporate Governance Structure and Members / Sustainability Governance / Risks and Uncertainties for the Next Year / 2021 Performance
Responsiveness	Responsiveness to key issues and transparency on performance	Sustainable Business Model / Stakeholder Management & Engagement / Additional Information for GRI Indicators / Sustainability Governance / Report Profile / Appendix
Impact	Analysis of direct and indirect impact of the company's actions.	Sustainable Business Model / Key Achievements and targets / Stakeholder Management & Engagement / Additional Information for GRI Indicators / Sustainability Governance / Report Profile / Appendix / Compliance Management / Health and Safety / Social Initiatives / Environmental

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



OTE Group, Greece’s largest technology organization, has incorporated and embraces the 10 Principles of the UN Global Compact, the largest voluntary corporate citizenship initiative in the world, to its operations and everyday activities. The Group reaffirms its support to these key principles in the areas of human rights, labor standards, environmental protection and anti-corruption, which are 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 and report on their efforts to adhere to its Principles. This annual Communication on Progress presents the key sections of its 2021 Integrated Report as they relate to the Global Compact’s principles.

In addition, the report includes a detailed presentation of the companies’ priorities, activities, goals and outcomes, responding to all 21 criteria of Advanced CoP.



This is our Communication on Progress in implementing the principles of the United Nations Global Compact and supporting broader UN goals. We welcome feedback on its contents.

CRITERIA	REPORT LOCATION
<b>Implementation of the Ten Principles into Strategies &amp; Operations</b>	
1 The COP describes mainstreaming into corporate functions and business units	<a href="#">Sustainable Business Model</a> / <a href="#">Sustainability Governance</a> <a href="#">Responsible Purchasing and Supply Chain Management</a>
2 The COP describes value chain implementation	
<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> <a href="#">Human Rights Management</a> <a href="#">Human Rights Management</a>
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	
<b>Robust Labour Management Policies &amp; Procedures</b>	
6 The COP describes robust commitments, strategies or policies in the area of labour	<a href="#">Human Resources Management</a> / <a href="#">Employees</a> / <a href="#">Fair Employment Policy Framework and Equal Opportunities</a> <a href="#">Human Resources Management</a> / <a href="#">Employees</a> / <a href="#">Fair Employment Policy Framework and Equal Opportunities</a> <a href="#">Human Resources Management</a> / <a href="#">Employees</a> / <a href="#">Fair Employment Policy Framework and Equal Opportunities</a>
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	



APPENDIX | UNITED NATIONS GLOBAL COMPACT – COMMUNICATION ON PROGRESS (COP)

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

# ATHEX Guide Index

Since the launch of the Athens Stock Exchange ESG Reporting Guide in 2019, OTE Group took immediate action to support the Stock Exchange’s actions to facilitate the provision of comparable, high-quality and transparent ESG disclosures among Greek companies. For the third year, OTE Group reports its ESG disclosures and practices in line with the Guide’s recommendations (version 2022). Detailed information can be found in the table below.

ATHEX ESG METRICS	ESG METRIC ID	METRIC TITLE	SECTION / COMMENTS
Environmental Core Metrics	C-E1	Scope 1 emissions	<a href="#">Energy and Climate Change / Environmental Performance Data - Energy</a> GHG intensity of scope 1 emissions: 4.84 t CO <sub>2</sub> eq per million €
	C-E2	Scope 2 emissions	<a href="#">Energy and Climate Change / Environmental Performance Data - Energy</a> GHG intensity of scope 2 emissions: 0.02 t CO <sub>2</sub> eq per million € (market-based)
	C-E3	Energy consumption and production	<a href="#">Energy and Climate Change / Environmental Performance Data - Energy</a> Total amount of energy produced: 1,634 MWh Total percentage of energy produced from RES: 100%
Advanced Metrics	A-E1	Scope 3 emissions	<a href="#">Energy and Climate Change</a> GHG intensity of scope 3 emissions: 223 t CO <sub>2</sub> eq per million €
	A-E2	Climate change risks and opportunities	<a href="#">Risk and Uncertainties for the Next Year / Environmental Strategy / Energy and Climate Change / 2021 Annual Financial Report</a> Detailed information concerning climate change risks and opportunities identified, can be found in the latest response of OTE to CDP.
	A-E3	Waste management	<a href="#">Environmental Strategy / Circular Economy - Reuse and Recycle / OTE Group Environmental Performance Data - Waste</a>
	A-E4	Effluent discharge	<a href="#">Circular Economy - Water</a>
	A-E5	Biodiversity sensitive areas	<a href="#">Other Environmental Aspects (Biodiversity) / Global Reporting Initiative Content Index (GRI 304-1, 304-2, 304-3, 304-4)</a>
Sector-specific	SS-E7	Critical materials	<a href="#">Global Reporting Initiative Content Index (GRI 301-2)</a>
Social Core Metrics	C-S1	Stakeholder engagement	<a href="#">Stakeholder Management &amp; Engagement / OTE Group Internal Regulation of Operations / Article 36: Communication Channels</a>
	C-S2	Female employees	<a href="#">Employment / Human Resources Performance Data</a>
	C-S3	Female employees in management positions	<a href="#">Fair Employment Policy Framework and Equal Opportunities / Human Resources Performance Data</a>
	C-S4	Employee turnover	<a href="#">Employment / Human Resources Performance Data</a>
	C-S5	Employee training	<a href="#">Employee Training and Skills Development / Human Resources Performance Data</a>
	C-S6	Human rights policy	<a href="#">Human Rights Management</a>
	C-S7	Collective bargaining agreements	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>
	C-S8	Supplier assessment	<a href="#">Responsible Purchasing and Supply Chain Management</a>

APPENDIX | ATHEX GUIDE INDEX

ATHEX ESG METRICS	ESG METRIC ID	METRIC TITLE	SECTION / COMMENTS
Social Advanced Metrics	A-S1	Sustainable economic activity	Taxonomy Related Disclosures
	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
	A-S4	CEO pay ratio	Annual Financial Report 2021 / Remuneration Report for the Members of the Board of Directors for the fiscal year 2020
Sector-specific Metrics	SS-S3	Legal requests of user data	Security and Data Privacy
	SS-S5	Data security and privacy fines	Security and Data Privacy
Governance Core Metrics	C-G1	Board composition	Governance / Corporate Governance Structure and Members / Board Of Directors / Performance Indicators on Human Resources
	C-G2	Sustainability oversight	Sustainability Governance
	C-G3	Materiality	Stakeholder Management & Engagement
	C-G4	Sustainability policy	Sustainable Business Model / OTE Group of Companies Compliance Policies / OTE Group Internal Regulation of Operations / Article 35: Sustainability Policy
	C-G5	Business ethics policy	Human Rights Management
	C-G6	Data security policy	Security and Data Privacy
Advanced Metrics	A-G1	Business model	Sustainable Business Model
	A-G2	Business ethics violations	Compliance Management
	A-G3	ESG targets	Key Achievements and Targets
	A-G4	Variable pay	Annual Financial Report 2021 / Remuneration Report for the Members of the Board of Directors for the fiscal year 2020
	A-G5	External assurance	Independent Assurance Report
Sector-specific Metrics	SS-G3	Systemic risk management	Business Continuity / Enterprise Risk Management / Risks & Uncertainties for the next year

# SASB Index

The table below presents the response of OTE Group in relation to the sector-specific criteria of the Telecommunications Sustainability Accounting Standard (version 2018-10) issued by SASB (Sustainability Accounting Standards Board).

TOPIC	TELECOMMUNICATION SERVICES SASB METRIC	CATEGORY	DISCLOSURE	UNIT OF MEASURE	CODE
Environmental Footprint of Operations	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	Quantitative	See <a href="#">Energy and Climate Change</a> See <a href="#">Environmental Performance Data – Energy</a>	Gigajoules (GJ), Percentage (%)	TC-TL-130a.1
Data Privacy	Description of policies and practices relating to behavioral advertising and customer privacy	Discussion & Analysis	See <a href="#">Security and Data Privacy</a> See <a href="#">Communication with Customers</a>	n/a	TC-TL-220a.1
	Number of customers whose information is used for secondary purposes	Quantitative	See <a href="#">Security and Data Privacy</a> Quantitative data not publicly available.	Number	TC-TL-220a.2
	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Quantitative	See <a href="#">Security and Data Privacy</a>	Reporting currency	TC-TL-220a.3
	(1) Number of law enforcement requests for customer information, (2) number of customers whose information was requested, (3) percentage resulting in disclosure	Quantitative	See <a href="#">Security and Data Privacy</a>	Number, Percentage (%)	TC-TL-220a.4
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected	Quantitative	See <a href="#">Security and Data Privacy</a> 37 incidents, 100% involving personally identifiable information (PII), 113 customers affected	Number, Percentage (%)	TC-TL-230a.1
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Discussion & Analysis	See <a href="#">Security and Data Privacy</a>	n/a	TC-TL-230a.2
Product End-of- life Management	(1) Materials recovered through take back programs, percentage of recovered materials that were (2) reused, (3) recycled, and (4) landfilled	Quantitative	See <a href="#">Circular Economy - Reuse and Recycle</a> See <a href="#">OTE Group Environmental Performance Data – Waste</a>	Metric tons (t), Percentage (%)	TC-TL-440a.1
Competitive Behavior & Open Internet	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	Quantitative	No fine imposed during 2021, as a result of anticompetitive behavior See <a href="#">Responsible Competition</a>	Reporting currency	TC-TL-520a.1
	Average actual sustained download speed of (1) owned and commercially associated content and (2) non-associated content	Quantitative	Mobile Average Download speed: Semester 1 2021: 58.01Mbps Semester 2 2021: 60.68Mbps  No distinction is made between associated and non-associated content. Data on fixed download speed not publicly available.	Megabits per second (Mbps)	TC-TL-520a.2

APPENDIX | SASB INDEX

TOPIC	TELECOMMUNICATION SERVICES SASB METRIC	CATEGORY	DISCLOSURE	UNIT OF MEASURE	CODE
Competitive Behavior & Open Internet	Description of risks and opportunities associated with net neutrality, paid peering, zero rating and related practices	Discussion & Analysis	See <a href="#">Compliance Management / Code of Conduct for E-Commerce / Connectivity for All / Digital Inclusion for All / Products and Services for Sustainability / Risks and Uncertainties for the Next Year</a>	n/a	TC-TL-520a.3
Managing Systemic Risks from Technology Disruptions	(1) System average interruption frequency and (2) customer average interruption duration	Quantitative	See <a href="#">Business Continuity</a>	Disruptions per customer, Hours per customer	TC-TL-550a.1
Technology Disruptions	Discussion of systems to provide unimpeded service during service interruptions	Discussion & Analysis	See <a href="#">Business Continuity</a>	n/a	TC-TL-550a.2

ACTIVITY METRICS	CATEGORY	DISCLOSURE	UNIT OF MEASURE	CODE
Number of wireless subscribers	Quantitative	See <a href="#">Annual Financial Report 2021</a> (p.9, 11)	Number	TC-TL-000.A
Number of wireline subscribers	Quantitative	See <a href="#">Annual Financial Report 2021</a> (p.9, 11)	Number	TC-TL-000.B
Number of broadband subscribers	Quantitative	See <a href="#">Annual Financial Report 2021</a> (p.9, 11)	Number	TC-TL-000.C
Network traffic	Quantitative	OTE 6.396 PB COSMOTE 414 PB	Petabytes	TC-TL-000.D



# 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 the 2021 Integrated Report

CRITERIA	REPORT LOCATION
<p><b>Strategy</b></p> <ul style="list-style-type: none"> <li>1. Strategic analysis and action</li> <li>2. Materiality</li> <li>3. Objectives</li> <li>4. Value chain management</li> </ul>	<p><a href="#">Sustainable Business Model</a>  <a href="#">Stakeholder Management &amp; Engagement</a>  <a href="#">Key Achievements and Targets / 2021 Performance</a>  <a href="#">Responsible Purchasing and Supply Chain Management</a></p>
<p><b>Process Management</b></p> <ul style="list-style-type: none"> <li>5. Responsibility</li> <li>6. Rules and procedures</li> <li>7. Monitoring</li> <li>8. Rewarding schemes and motives for sustainable development</li> <li>9. Stakeholders engagement</li> <li>10. Responsible products and innovation</li> </ul>	<p><a href="#">Corporate Governance Structure and Members</a>  <a href="#">Enterprise Risk Management / Compliance Management / Integrated Management System</a>  <a href="#">Sustainable Business Model / Key Achievements and Targets / Corporate Governance Structure and Members</a>  <a href="#">Integrated Management System / Independent Assurance Report</a>  <a href="#">Corporate Governance Structure and Members / Board of Directors / Employee Selection, Attracting and Retaining Talented Employees</a>  <a href="#">Stakeholder Management &amp; Engagement / Additional Information for GRI Indicators / Stakeholders</a>  <a href="#">Products and Service for Sustainability / Energy and Climate Change</a></p>
<p><b>Environment</b></p> <ul style="list-style-type: none"> <li>11. Use of natural resources</li> <li>12. Management of resources</li> <li>13. Climate relevant emissions</li> </ul>	<p><a href="#">Energy and Climate Change / Circular Economy</a>  <a href="#">Energy and Climate Change / Circular Economy / Environmental Performance Data - Waste</a>  <a href="#">Energy and Climate Change / Other Environmental Aspects / Environmental Performance Data - Energy</a></p>

APPENDIX | GREEK SUSTAINABILITY CODE – DECLARATION OF CONFORMITY

CRITERIA	REPORT LOCATION
<p><b>Society</b></p> <p>14. Employment rights</p> <p>15. Equal opportunities</p> <p>16. Qualifications</p> <p>17. Human rights in the supply chain</p> <p>18. Corporate citizenship</p> <p>19. Initiatives and political influence</p> <p>20. Corruption prevention and fighting</p>	<p>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</p> <p>Human Rights Management / Fair Employment Policy Framework and Equal Opportunities / Health and Safety            OTE Group Code of Human Rights and Social Principles</p> <p>Human Resources Management / Employment / Employee Selection, Attracting and Retaining Talented Employees            Employee Training and Skills Development / Human Resources Performance Data</p> <p>Human Rights Management / Responsible Purchasing and Supply Chain Management            OTE Group Code of Human Rights and Social Principles</p> <p>Group Presentation / Key Achievements and Targets / Connectivity for All / Overall Social Contribution</p> <p>Awards / Stakeholder Management &amp; Engagement / Compliance Management</p> <p>Compliance Management</p>

# Global Reporting Initiative Content Index

The OTE Group 2021 Integrated Report is “in accordance” with the GRI Standards at “core” level.

GRI STANDARDS	DISCLOSURE	SECTION
GRI 101 Foundation 2016		
General Disclosures		
<b>GRI 102 General Disclosures 2016</b>	<b>Organizational Profile</b> 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	<b>Report Profile</b> <b>Group Presentation</b> <b>Report Profile</b> <b>Group Presentation</b> <b>Group Presentation</b>  <b>Group Presentation</b> <b>Key Achievements and Targets</b> <b>Connectivity for All</b>  <b>Group Presentation</b> <b>Key Achievements and Targets</b> <b>Financial &amp; Operational Highlights</b> <b>Annual Financial Report</b>  <b>Employment</b> <b>Human Resources Performance Data</b>  <b>Responsible Purchasing and Supply Chain Management</b>  <b>Responsible Purchasing and Supply Chain Management</b>  <b>Sustainable Business Model</b> <b>Enterprise Risk Management</b> <b>Compliance Management</b> <b>Integrated Management System</b> <b>Health and Safety</b> <b>Environmental Strategy</b>

APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS	DISCLOSURE	SECTION
	102-12 External initiatives	Report Profile / Stakeholder Management & Engagement Additional Information for GRI Indicators / Memberships
	102-13 Membership of associations	Compliance Management / Stakeholder Management & Engagement Awards / Additional Information for GRI Indicators / Memberships
	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 Management & Engagement Additional Information for GRI Indicators / Stakeholders
	102-41 Collective bargaining agreements 102-42 Identifying and selecting stakeholders	Fair Employment Policy Framework and Equal Opportunities Stakeholder Management & Engagement Additional Information for GRI Indicators / Stakeholders
	102-43 Approach to stakeholder engagement	Report Profile / Sustainable Business Model / Stakeholder Management & Engagement Customer Service and Satisfaction / Employee Communication, Engagement and Satisfaction Additional Information for GRI Indicators / Stakeholders
	102-44 Key topics and concerns raised	Additional Information for GRI Indicators / Stakeholders

APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS	DISCLOSURE	SECTION
	Reporting practice	
	102-45 Entities included in the consolidated financial statements	Report Profile
	102-46 Defining report content and topic Boundaries	Group Presentation
	102-47 List of material topics	Report Profile
	102-48 Restatements of information	Stakeholder Management & Engagement
	102-49 Changes in reporting	Stakeholder Management & Engagement
	102-50 Reporting period	Additional Information for GRI Indicators / Materiality Analysis
	102-51 Date of most recent report	Report Profile
	102-52 Reporting cycle	Report Profile
	102-53 Contact point for questions regarding the report	Report Profile
	102-54 Claims of reporting in accordance with the GRI Standards	The most recent published report covers the period from January 1 to December 31, 2020.
	102-55 GRI content index	Annual Report
	102-56 External assurance	Report Profile
		Report Profile
		Global Reporting Initiative Content Index
		Independent Assurance Report
<b>Material Issues</b>		
<b>Ethical Business Practices</b>		
<b>GRI 103 Management Approach 2016</b>	103-1 Explanation of the material topic and its boundary	
	103-2 The management approach and its components	Additional Information for GRI Indicators / Materiality Analysis / Key Achievements and Targets
	103-3 Evaluation of the management approach	
<b>GRI 205 Anti-corruption 2016</b>	205-1 Operations assessed for risks related to corruption	Compliance Management
	205-2 Communication and training about anti-corruption policies and procedures	Compliance Management
	205-3 Confirmed incidents of corruption and actions taken	Compliance Management



APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS	DISCLOSURE	SECTION
<p><b>GRI 206 Anti-competitive behavior 2016</b></p>	<p>206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices</p>	<p>Compliance Management</p>
<p><b>GRI 419 Socioeconomic Compliance 2016</b></p>	<p>419-1 Non-compliance with laws and regulations in the social and economic area</p>	<p>Compliance Management Safe, Branded Customer Products Security and Data Privacy</p>
<p><b>Energy and Climate Change</b></p>		
<p><b>GRI 103 Management Approach 2016</b></p>	<p>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</p>	<p>Energy and Climate Change / Environmental Strategy / Additional Information for GRI Indicators / Materiality Analysis Key Achievements and Targets Energy and Climate Change / Environmental Strategy / Additional Information for GRI Indicators / Materiality Analysis Key Achievements and Targets Energy and Climate Change / Environmental Strategy / Additional Information for GRI Indicators / Materiality Analysis Key Achievements and Targets</p>
<p><b>GRI 302 Energy 2016</b></p>	<p>302-1 Energy consumption within the organization 302-3 Energy intensity 302-4 Reduction of energy consumption 302-5 Reductions in energy requirements of products and services</p>	<p>Energy and Climate Change / Environmental Performance Data - Energy Energy and Climate Change / Environmental Performance Data - Energy Energy and Climate Change / Environmental Performance Data - Energy Energy and Climate Change / Environmental Performance Data - Energy</p>
<p><b>GRI 305 Emissions 2016</b></p>	<p>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</p>	<p>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</p>

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GRI STANDARDS	DISCLOSURE	SECTION
Employee Health, Safety and Wellness		
<p><b>GRI 103 Management Approach 2016</b></p>	<p>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</p>	<p><a href="#">Health and Safety / Additional Information for GRI Indicators / Materiality Analysis / Key Achievements and Targets</a>  <a href="#">Health and Safety / Additional Information for GRI Indicators / Materiality Analysis / Key Achievements and Targets</a>  <a href="#">Health and Safety / Additional Information for GRI Indicators / Materiality Analysis / Key Achievements and Targets</a></p>
<p><b>GRI 403 Occupational Health and Safety 2018 Management approach disclosures</b></p>	<p>403-1 Occupational health and safety management system                      403-2 Hazard identification, risk assessment, and incident investigation                      403-3 Occupational health services                      403-4 Worker participation, consultation, and communication on occupational health and safety                      403-5 Worker training on occupational health and safety                      403-6 Promotion of worker health                      403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</p>	<p><a href="#">Health and Safety</a>  <a href="#">Health and Safety</a>  <a href="#">Health and Safety</a>  <a href="#">Health and Safety</a>  <a href="#">Health and Safety</a>  <a href="#">Health and Safety</a>  <a href="#">Health and Safety</a></p>
<p><b>GRI 403 Occupational Health and Safety 2018 Topic-specific disclosures</b></p>	<p>403-9 Work-related injuries</p>	<p><a href="#">Health and Safety / Additional Information for GRI Indicators / Health and Safety Performance / Human Resources Performance Data / Risks and uncertainties for the next year / Health and Safety in the workplace</a>                      The main types of work-related injuries included employee slips and falls (mainly outside of the corporate premises), contact with objects and equipment, and motor vehicle accidents (mostly on the way to/after work).                      The data for "employees who are not employees but whose work and / or workplace is controlled by the organization - first level of cooperation and / or according to the terms of the agreements" are not available for OTE Group, as the corresponding collection process data has not been created. However, OTE Group has started the creation of such kind of process, which may concern the collection of data from contractors/companies of first level of cooperation in technology field (not including subcontractors) in order to launch the reporting within the next year.</p>

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GRI STANDARDS	DISCLOSURE	SECTION
<b>Employee training and skills development</b>		
<b>GRI 103 Management Approach 2016</b>	103-1 Explanation of the material topic and its boundary	<a href="#">Employee Training and Skills Development / Additional Information for GRI Indicators / Materiality Analysis Key Achievements and Targets</a>
	103-2 The management approach and its components	<a href="#">Employee Training and Skills Development / Additional Information for GRI Indicators / Materiality Analysis Key Achievements and Targets</a>
	103-3 Evaluation of the management approach	<a href="#">Employee Training and Skills Development / Additional Information for GRI Indicators / Materiality Analysis Key Achievements and Targets</a>
<b>GRI 404 Training and Education 2016</b>	404-1 Average hours of training per year per employee	<a href="#">Employee Training and Skills Development / Human Resources Performance Data</a>
	404-2 Programs for upgrading employee skills and transition assistance programs	<a href="#">Employee Selection, Attracting and Retaining Talented Employees / Employee Training and Skills Development</a>
	404-3 Percentage of employees receiving regular performance and career development reviews	<a href="#">Employee Selection, Attracting and Retaining Talented Employees</a>
<b>Fair Employment and Employee Management</b>		
<b>GRI 103 Management Approach 2016</b>	103-1 Explanation of the material topic and its boundary	<a href="#">Fair Employment Policy Framework and Equal Opportunities / Additional Information for GRI Indicators / Materiality Analysis Key Achievements and Targets</a>
	103-2 The management approach and its components	<a href="#">Fair Employment Policy Framework and Equal Opportunities / Additional Information for GRI Indicators / Materiality Analysis Key Achievements and Targets</a>
	103-3 Evaluation of the management approach	<a href="#">Fair Employment Policy Framework and Equal Opportunities / Additional Information for GRI Indicators / Materiality Analysis Key Achievements and Targets</a>
<b>GRI 405 Diversity and Equal Opportunity 2016</b>	405-1 Diversity of governance bodies and employees	<a href="#">Employment / Fair Employment Policy Framework and Equal Opportunities / Human Resources Performance Data</a> <a href="#">OTE Group Code of Human Rights and Social Principles / OTE Group Policy on Employee Relations</a> Minority group membership is not a material issue for the operation of OTE Group in Greece
	405-2 Ratio of basic salary and remuneration of women to men	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a>
<b>GRI 401 Employment 2016</b>	401-1 New employee hires and employee turnover	<a href="#">Employment / Human Resources Performance Data</a>
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	<a href="#">Additional Information for GRI Indicators / Employee Benefits</a>
	401-3 Parental leave	<a href="#">Fair Employment Policy Framework and Equal Opportunities</a> All employees, female and male, returned to their normal duties.

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GRI STANDARDS	DISCLOSURE	SECTION
<b>Data Security and Privacy</b>		
<b>GRI 103 Management Approach 2016</b>	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	<a href="#">Security and Data Privacy / Additional Information for GRI Indicators / Materiality Analysis / Key Achievements and Targets</a> <a href="#">Security and Data Privacy / Additional Information for GRI Indicators / Materiality Analysis / Key Achievements and Targets</a> <a href="#">Security and Data Privacy / Additional Information for GRI Indicators / Materiality Analysis / Key Achievements and Targets</a>
<b>GRI 418 Customer Privacy 2016</b>	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	<a href="#">Security and Data Privacy</a>
<b>Customer Service and Satisfaction</b>		
<b>GRI 103 Management Approach 2016</b>	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 Results of surveys measuring customer satisfaction	<a href="#">Customer Service and Satisfaction / Additional Information for GRI Indicators / Materiality Analysis / Key Achievements and Targets</a> <a href="#">Customer Service and Satisfaction</a>
<b>Business Continuity</b>		
<b>GRI 103 Management Approach 2016</b>	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	<a href="#">Business Continuity / Additional Information for GRI Indicators / Materiality Analysis / Key Achievements and Targets / Risks and Uncertainties for the Next Year / Critical infrastructure failure</a>
<b>Electromagnetic Fields (EMF)</b>		
<b>GRI 103 Management Approach 2016</b>	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	<a href="#">Electromagnetic Fields / Additional Information for GRI Indicators / Materiality Analysis / Key Achievements and Targets</a>
<b>GRI 416 Customer Health and Safety 2016</b>	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	<a href="#">Communication with Customers / Electromagnetic Fields</a> <a href="#">Communication with Customers / Electromagnetic Fields</a>

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GRI STANDARDS	DISCLOSURE	SECTION
<b>Other Issues</b>		
<b>Economic Performance</b>		
<b>GRI 201 Economic Performance 2016</b>	201-1 Direct economic value generated and distributed 201-2 Financial implications and other risks and opportunities due to climate change 201-4 Financial assistance received from government	<b>Economic Value Distribution / Key Achievements and Targets</b> <b>Products and Services for Sustainability / Environmental Strategy / Energy and Climate Change</b>  OTE Group companies do not receive any government financial subsidies (except from co-funding contributions from the Greek State and the European Commission for developmental or competitive projects), special tax relief or other government financial support.
<b>Human Rights Assessment</b>		
<b>GRI 412 Human Rights Assessments 2016</b>	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	<b>Human Rights Management</b>  <b>Human Rights Management</b> <b>Human Rights Management</b>
<b>Marketing Communications</b>		
<b>GRI 417 Marketing and Labelling 2016</b>	417-1 Requirements for product and service information and labelling 417-2 Incidents of non-compliance concerning product and service information and labelling 417-3 Incidents of non-compliance concerning marketing communications	<b>Communication with Customers</b> <b>Communication with Customers</b>  <b>Communication with Customers</b>



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GRI STANDARDS	DISCLOSURE	SECTION
<b>Market Presence</b>		
<b>GRI 202 Market Presence 2016</b>	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	<b>Fair Employment Policy Framework and Equal Opportunities</b>  <b>Employee Selection, Attracting and Retaining Talented Employees</b> 91% of Chief Officers and Executive Directors are local citizens.
<b>Indirect Economic Impacts</b>		
<b>GRI 203 Indirect Economic Impacts 2016</b>	203-1 Infrastructure investments and services supported           203-2 Significant indirect economic impacts	<b>Connectivity for All</b> <b>Overall Social Contribution</b> <b>Electromagnetic Fields</b> <b>Other Environmental Aspects</b>   <b>Key Achievements and Targets</b> <b>Products and Service for Sustainability</b> <b>Connectivity for All</b> <b>Overall Social Contribution</b> <b>Digital Inclusion for all</b>
<b>Procurement Practices</b>		
<b>GRI 204 Procurement Practices 2016</b>	204-1 Proportion of spending on local suppliers	<b>Responsible Purchasing and Supply Chain Management</b>

## APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS	DISCLOSURE	SECTION
<b>Materials</b>		
<b>GRI 301 Materials 2016</b>	301-1 Materials used by weight or volume	<p><b>Circular Economy</b></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).</p> <p>OTE Group, as described in the <b>OTE Group Supplier Code of Conduct</b>, 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 <b>OTE Group Supplier Code of Conduct</b>.</p>
	301-3 Reclaimed products and their packaging materials	<p><b>Circular Economy</b></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 with other retail outlets, and therefore it is not possible to estimate the percentage of products sold that are actually reclaimed.</p> <p>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>
<b>Water</b>		
<b>GRI 303 Water 2016</b>	303-3 Water withdrawal	<p><b>Circular Economy</b></p> <p>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>
	303-4 Water discharge	
	303-5 Water consumption	

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GRI STANDARDS	DISCLOSURE	SECTION
<b>Biodiversity</b>		
<p><b>GRI 304 Biodiversity 2016</b></p>	<p>304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas</p> <p>304-2 Significant impacts of activities, products, and services on biodiversity</p> <p>304-3 Habitats protected or restored</p> <p>304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations</p>	<p><b>Other Environmental Aspects</b></p> <p>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"> <li>• Potential impacts are mainly related to the operation of installations in isolated areas necessary for the reliable provision of telecommunication services (energy consumption, EMF emissions) and infrastructure works for upgrading / maintaining telecommunication network (waste generation).</li> <li>• All potential impacts are addressed in the Environmental Impact Assessment studies carried out and submitted for approval to the designated authorities as foreseen by national legislation in force. In these studies, special reference is made to protected areas (NATURA, SPA, RAMSAR, CORINE, IBA) and areas of high biodiversity value that are near to the activities of OTE Group companies. The contents of these studies and the approval process, that includes a public consultation phase, are specified in the relevant legislative acts. These studies, on the basis of current scientific knowledge, conclude that impacts on biodiversity are not material, and therefore there are no protected and / or restored habitat areas that are affected by the operation of OTE Group.</li> <li>• 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 &amp; Post Commission accompanied by a Special Environmental Assessment'</li> </ul> <p>The majority of the installations are small, without permanent personnel and with limited transportation activities at the operational stage.</p>
<b>Waste</b>		
<p><b>GRI 306 Waste 2020</b></p>	<p>306-3 Waste generated</p> <p>306-4 Waste diverted from disposal</p> <p>306-5 Waste directed to disposal</p>	<p><b>Circular Economy / Environmental Performance Data – Waste</b></p> <p>There were no significant spills during the management of batteries and lubricants.</p> <p><b>Circular Economy / Environmental Performance Data – Waste</b></p> <p><b>Circular Economy / Environmental Performance Data – Waste</b></p>

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GRI STANDARDS	DISCLOSURE	SECTION
<b>Environmental Compliance</b>		
<b>GRI 307 Environmental Compliance 2016</b>	307-1 Non-compliance with environmental laws and regulations	The fines (related to the environment) imposed in 2021 amounted to € 21,300, while no non-monetary sanctions or complaints were brought before dispute resolution mechanisms. The aforementioned amount of fines is expected to decrease, due to available judicial procedures.
<b>Supplier Environmental Assessment</b>		
<b>GRI 308 Supplier Environmental Assessment 2016</b>	308-1 New suppliers that were screened using environmental criteria 308-2 Negative environmental impacts in the supply chain and actions taken	<b>Responsible Purchasing and Supply Chain Management</b> <b>Responsible Purchasing and Supply Chain Management</b>
<b>Labor/Management Relations</b>		
<b>GRI 402 Labor/Management Relations 2016</b>	402-1 Minimum notice periods regarding operational changes	For any significant change in their operation (e.g. reorganization, outsourcing operation, business interruption, expansions, new job positions, acquisitions, sale of all or part of the company, or mergers), OTE Group companies inform or consult the most representative trade unions as appropriate, applying each time the current legislative framework.
<b>Non-discrimination</b>		
<b>GRI 406 Non-discrimination 2016</b>	406-1 Incidents of discrimination and corrective actions taken	<b>Human Rights Management</b>
<b>Freedom of Association and Collective Bargaining</b>		
<b>GRI 407 Freedom of Association and Collective Bargaining 2016</b>	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	<b>Human Rights Management / Fair Employment Policy Framework and Equal Opportunities</b> <b>Responsible Purchasing and Supply Chain Management / OTE Group Code of Human Rights and Social Principles / OTE Group Policy on Employee Relations</b>

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GRI STANDARDS	DISCLOSURE	SECTION
<b>Child Labor</b>		
GRI 408 Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	<ul style="list-style-type: none"> <li>Human Rights Management</li> <li>Responsible Purchasing and Supply Chain Management</li> <li>OTE Group Code of Human Rights and Social Principles</li> <li>OTE Group Policy on Employee Relations</li> </ul>
<b>Forced or Compulsory Labor</b>		
GRI 409 Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	<ul style="list-style-type: none"> <li>Human Rights Management</li> <li>Responsible Purchasing and Supply Chain Management</li> <li>OTE Group Code of Human Rights &amp; Social Principles</li> </ul>
<b>Local Communities</b>		
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	<ul style="list-style-type: none"> <li>Overall Social Contribution</li> <li>Overall Social Contribution</li> <li>Electromagnetic Fields</li> <li>Other Environmental Aspects</li> </ul> <p>Environmental protection expenditures for 2021 amounted to about € 2 million and cover waste treatment, management and disposal, environmental impact assessment studies, external certification of environmental management systems and measurements on electromagnetic fields.</p>
<b>Supplier Social Assessment</b>		
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	<ul style="list-style-type: none"> <li>Responsible Purchasing and Supply Chain Management</li> <li>Responsible Purchasing and Supply Chain Management</li> </ul>





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GRI STANDARDS	DISCLOSURE	SECTION
Public Policy		
GRI 415 Public Policy 2016	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.

# Additional Information for GRI Indicators

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

ORGANIZATION / INITIATIVE	COMPANY	PARTICIPATION TYPE
<b>Greece</b>		
Hellenic Network for Corporate Social Responsibility (CSR Hellas)	OTE Group	Member since 2001.
Global Compact Network Hellas (GCNH)	OTE	Founding member as of 2018.
Federation of Hellenic Enterprises (SEV) Council for Sustainable Development	OTE Globe	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.
Greek Diversity Charter	OTE Group	Founding member, since 2019.
Transparency International Greece	OTE Group	Member of Business Integrity Forum of Transparency International, since 2017.
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.
Federation of Hellenic Information Technology and Communications, Enterprises (SEPE)	OTE	Member since 1998.
<b>Europe</b>		
European Telecommunications Network Operators' Association (ETNO)	OTE	Founding member of ETNO since 1992 and member of Sustainable Development Working Group since 2007. OTE signed the Sustainability Charter in 2011.
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.

APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

ORGANIZATION / INITIATIVE	COMPANY	PARTICIPATION TYPE
International		
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.
	Telekom Romania Mobile Communications	Telekom Romania Mobile Communications has been a partner of United Nations Global Compact (Global Compact Network Romania) since 2015. Telekom Romania Mobile Communications 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.
GSM Association (GSMA)	COSMOTE	Member of the World Association of Mobile Communications Services since 1997. COSMOTE actively participates in many of its workgroups.
	Telekom Romania Mobile Communications	Member.
Association of Certified Fraud Examiners (ACFE)	OTE	Member, since 2020, of Corporate Alliance Program.

APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

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

MOST IMPORTANT ISSUES FOR MANAGEMENT & STAKEHOLDERS	DEMARCATIION (INSIDE / OUTSIDE COMPANIES)
3 Ethical Business Practices	The issue is primarily internal, has an impact on the operation of the companies and their employees.
5 Fair Employment and Employee Management	The issue is primarily internal, has an impact on the operation of the companies and their employees.
6 Employee Training and Skills Development	The issue is primarily internal, has an impact on the operation of the companies and their employees.
8 Business Continuity	The issue is primarily internal, has an impact on the operation of the companies, and may affect their shareholders, employees, suppliers and customers.
9 Data Security and Privacy	The issue is primarily external and has an impact on their customers.
10 Employee Health, Safety and Wellness	The issue is primarily internal, has an impact on the operation of the companies and their employees.
17 Energy and climate change	The issue is internal, as it has an impact on the operation of the companies, and external as it directly and indirectly affects the general public.
15 Customer service and satisfaction	The issue is internal, has an impact on the operation of the companies and their employees, and external as it directly affects their customers.
19 Electromagnetic Fields (EMF)	The issue is internal, as it has an impact on the operation of the company, and external as it directly affects customers and the general public.



APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

		Stakeholder								
		SHAREHOLDERS, BONDHOLDERS, INVESTORS & ANALYSTS	CUSTOMER & PROSPECTIVE CUSTOMERS	EMPLOYEES AND THEIR REPRESENTATIVES	BUSINESS	ORGANIZATIONS OF SCIENCE, RESEARCH AND EDUCATION	NGOs AND INTEREST GROUPS	MEDIA	STATE/ GOVERNMENT ISSUES	SUPPLIERS
Issue	ECONOMIC PERFORMANCE	●						●		
	ETHICAL BUSINESS PRACTICES						●	●	●	
	HUMAN RIGHTS	●		●		●	●		●	
	FAIR EMPLOYMENT & EMPLOYEE MANAGEMENT			●				●		
	EMPLOYEE TRAINING & SKILLS DEVELOPMENT			●						
	BUSINESS CONTINUITY								●	
	DATA SECURITY AND PRIVACY	●	●	●	●	●	●		●	
	EMPLOYEE HEALTH, SAFETY AND WELLNESS	●	●	●	●			●	●	
	DIGITAL SOCIETY							●	●	
	PRODUCTS & SERVICES FOR SUSTAINABILITY							●		
	RESPONSIBLE COMMUNICATION WITH CUSTOMERS		●		●			●		
	CUSTOMER SERVICE AND SATISFACTION	●	●		●	●		●	●	
	ENERGY AND CLIMATE CHANGE					●				
	CIRCULAR ECONOMY							●		
	ELECTROMAGNETIC FIELDS (EMF)		●		●	●	●			

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



**Primary Stakeholders (Relevant for GRI Standards 102-40, 102-42, 102-43, 102-44)**

## PRIMARY 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 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

**Organizations of science, research & 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

**Shareholders, bondholders, investors and analysts**

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

APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

PRIMARY STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
<p><b>Customers and prospective customers</b></p>	<ul style="list-style-type: none"> <li>Customer satisfaction surveys</li> <li>CR surveys</li> <li>Tracking studies</li> <li>Call centers</li> <li>Customer account managers</li> <li>Social media</li> <li>Sales network</li> <li>Companies' websites</li> <li>Key account managers</li> <li>Presentations on OTE systems</li> <li>Companies' mail boxes</li> <li>Press releases</li> <li>Corporate announcements</li> <li>Business Conferences</li> <li>Business Customer Events</li> <li>Advertisements</li> <li>Sustainability Report</li> </ul>	<ul style="list-style-type: none"> <li>Annual</li> <li>Annual</li> <li>Quarterly</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Annual</li> </ul>	<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>	<ul style="list-style-type: none"> <li>Customers</li> <li>Society</li> <li>Electromagnetic Fields</li> </ul>
<p><b>Business</b></p>	<ul style="list-style-type: none"> <li>Press releases</li> <li>Economic Results Releases</li> <li>Roadshows</li> <li>Meetings</li> <li>Conference calls</li> <li>Annual reports</li> <li>Presentations</li> <li>Trainings</li> <li>Sustainability Report</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> <li>Quarterly</li> <li>Ongoing</li> <li>Ongoing</li> <li>Ongoing</li> <li>Annual</li> <li>Ongoing</li> <li>Ongoing</li> <li>Annual</li> </ul>	<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>	<ul style="list-style-type: none"> <li>OTE Group</li> <li>Customers</li> <li>Employees</li> </ul>

APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

PRIMARY STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
<b>Science, research and education</b>	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"> <li>• New technology products and services</li> <li>• Communication safety</li> <li>• Technology awareness</li> </ul>	<b>Products and Services for Sustainability</b> <b>Safe and Responsible Use of Technology</b> <b>Overall Social Contribution</b>
<b>NGOs and interest groups</b>	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"> <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>	Integrated Report (all sections)
<b>Media</b>	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"> <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>	Integrated Report (all sections)

APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

PRIMARY STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
<p><b>State / Government entities</b></p>	<p>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</p>	<p>Ongoing                      Ongoing                      Ongoing                      Annual                      Ongoing                      Ongoing                      Annual</p>	<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>	<p><b>OTE Group</b>                      Compliance Management                      Connectivity for All                      Communication with Customers                      Overall Social Contribution                      Environmental Strategy                      Corporate Governance Structure and Members</p>
<p><b>Employees, prospective employees and their representatives</b></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                      Annual                      Ongoing                      Ongoing                      Ongoing                      Bi-weekly                      Ongoing                      Annual</p>	<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>	<p><b>Sustainable Business Model</b>                      Human Rights Management                      Security and Data Privacy                      Employees                      Employee Volunteering</p>

APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

PRIMARY STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
Suppliers	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	Ongoing  Ongoing Ongoing Annual Ongoing Ongoing Ongoing Periodic Annual	<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>	OTE Group Responsible Purchasing and Supply Chain Management
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 ( <a href="http://www.otewholesale.gr">www.otewholesale.gr</a> ) Sales Department OTE Systems presentations to telecom provider Special mail box ( <a href="mailto:otewholesale@ote.gr">otewholesale@ote.gr</a> ) Press Releases Corporate announcements	Ongoing Annual Annual  Annual Ongoing Ongoing Quarterly Ongoing Ongoing Ongoing Regularly Ongoing Ongoing Ongoing 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>	Integrated Report (all sections)



APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

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

MANAGEMENT SYSTEM CERTIFICATIONS	OTE GROUP							
	OTE	COSMOTE	Cosmote Technical Services (CTS)	GERMANOS	COSMOTE e- Value	OTE Globe	OTE Academy	Telekom Romania Mobile Communications
Integrated Management System, as per PAS99	•	•	•	•				
Quality Management System, as per ISO 9001	•	•	•	•	•		•	•
Environmental Management System, as per ISO 14001	•	•	•	•				•
Energy Management System, as per ISO 50001	•	•						
Occupational Health & Safety Management System, as per ISO 45001	•	•	•	•				•
Business Continuity Management System, as per ISO 22301	•	•	•					•
Information Security Management System, as per ISO 27001	•	•	•		•			•
Privacy Information Management as per ISO 27701	•	•	•					
Information Technology- Service Management, as per ISO 20000-1	•	•						
Risk Management System, as per ISO 31000	•	•	•					•
Anti-bribery Management System, as per ISO 37001	•	•	•	•				•
Compliance Management System, as per ISO 37301	•	•	•	•				•
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"	•	•						
SOC / ISAE 3402 Type 2 Report & ISAE 3000 Type 2 Report	•	•						

**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 2021**

**Insurance**

- Health insurance program (can include medical subscription) for employees and dependents.
- Life insurance program.
- Pension Plan.
- Preferential prices for employees and their protected family members for COVID-19 molecular diagnostic tests, in cooperation with specific diagnostic centers.

**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.

**Other benefits**

- Provision of special prices for goods and services of other companies.
- Offering, through a draw, of tickets to sporting and cultural events.
- Issuing of Food Vouchers.
- Staff bus for transportation of personnel to and from subway stations and commuter rail.
- Provision of multi-trip card or e-PASS, for employees in the Paiania building.
- Ability to use dining services in restaurants / coffee and quick food canteens, through central premises of the company.
- Ability to use dining services via delivery app in OTE Headquarters and Paiania premises.
- Settlement of expenses for commuting to work.
- Medical services for employees.
- Flexi Benefits, according to a list offered by the company to all non-Executive employees for CTS and Germanos employees.
- Provision of special payment has been granted to all non-Executive employees of OTE Group's companies, as a special recognition and appreciation for their performance during the COVID-19 pandemic.

**Family**

- Allowance for child care and nursery costs.
- Saving program through the "Youth Account" program.
- Wedding income support (e.g. 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.
- Special policies for working mothers and people with disabilities.
- Special support for large families.
- Financial support through "Fund for Mutual Help" for health expenses.
- Christmas gifts to employees' children.
- Privileged mobile program for employees' children who are students.
- Pregnancy and maternity leave for child care.
- Financial rewards for retirees' children, who excel in institutions of higher education.
- Financial support through "Fund of Mutual Help" to the employees in order to face difficulties for the care of elderly parents.
- Preferential prices for employees and their Family members for fertility services and for egg-freezing.

## MAIN BENEFITS TO OTE GROUP EMPLOYEES PER CATEGORY IN 2021

### Free time - Vacation

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- Through OPAKE, OTE offers its employees stay in privately owned resorts and at selected hotels in Greece and abroad.
- Holiday, Christmas and Easter bonus.
- **Extra-benefits applicable:**
  - Expenses claim for Travel Services 1 - Employees have the right to opt for this benefit in the flexible individual benefit model provided by the company.
  - Holiday Tickets - Employees have the right to opt for this benefit in the flexible individual benefit model provided by the company.

### Athletics – Wellness facilities

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- Ability to participate in Wellness programs:
  - The **Coach Wellness Platform** (dance, Pilates, yoga, training) that is free for all employees and their families, access from any device, 24/7.
  - **Healthy Me program** providing Wellness@home short videos with tips and suggestions on nutrition, exercise and musculoskeletal health issues and Wellness Reloaded Live Training Sessions with expert personal trainers for gentle physical activity from home.
- Ability to participate in **Team Sport Activities:**
  - **Football** 5x5 (internal championship).
  - **Basketball** (external corporate championships).
  - **Volleyball** (external corporate championships).
  - **Tennis** games (between employees of our company).
  - **Running team** (for 5/10/42 km).
  - **Outdoor training.**  
Extra slot: Participation in 3rd World Company Sports Games, which took place in Athens.
- Ability to participate in **Fitness programs:**
  - **Gym** in Paiania premises and **Mild Physical Exercise training groups** in Central Premises via personal e-booking reservation meetings.
- Ability to participate in **Wellness Days:**
  - **Mind and Nourishment** care webinars with expertise nutritionists and psychologists for all employees.
  - Webinars for **health and wellness promotion** in daily life (topics related to health, sleep, ergonomics, first aid for child injuries).
  - **Personal sessions** in central premises with expert occupational physiologist, dietician and physiotherapist aiming to inform, support and encourage employees for the adoption of daily health habits.
  - Webinars targeted in **handling specialized health issues** (topics related to infertility or children with special needs in daily life).
- Provision of special price offers that can be accessed through various sport and wellness providers.

### Employee support and counseling

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- **24/7 helpline** called **NEXT TO YOU**, anonymous and confidential, developed to empower and support all employees and their families, in every aspect of their daily life.
- **Individual sessions** with specialized mental health counselors provided physically presence (under conditions) or online for all employees.
- **Live webinars**, aimed at well-being, self-improvement and maintaining work-life balance (eg. Parental role for all ages, Resilience, Salesmen Empowerment and Support for customers best handling on special cases).

# Human Resources Performance Data

Performance Indicators on Human Resources		Unit	GREECE			ROMANIA			OTE GROUP		
			2019	2020	2021	2019	2020	2021	2019	2020	2021
<b>Total workforce (headcount on 31st of December)</b>		<b>Number</b>	<b>12,016</b>	<b>11,162</b>	<b>10,162</b>	<b>1,127</b>	<b>999</b>	<b>876</b>	<b>13,143</b>	<b>12,161</b>	<b>11,038</b>
<b>Employment type</b>											
Full - time dependent employment with indeterminant term contacts	Number (%)		11,533 (96.0%)	10,815 (96.9%)	9,859 (97%)	1,091 (97%)	977 (97.8%)	859 (98.1%)	12,624 (96.1%)	11,792 (97%)	10,718 (97.1%)
Part - time dependent employment with indeterminant term contracts	Number (%)		419 (3.5%)	308 (2.8%)	242 (2.4%)	3 (0.3%)	0 (0%)	2 (0.2%)	422 (3.2%)	308 (2.5%)	244 (2.2%)
Dependent employment, on fixed-term	Number (%)		64 (0.5%)	39 (0.3%)	61 (0.6%)	33 (2.9%)	22 (2.2%)	15 (1.7%)	97 (0.7%)	61 (0.5%)	76 (0.7%)
<b>Gender</b>											
Male	Number (%)		7,334 (61.0%)	6,894 (62%)	6,262 (62%)	413 (36.6%)	364 (36%)	356 (41%)	7,747 (58.9%)	7,258 (60%)	6,618 (60%)
Female	Number (%)		4,682 (39.0%)	4,268 (38%)	3,900 (38%)	714 (63.4%)	635 (64%)	520 (59%)	5,396 (41.1%)	4,903 (40%)	4,420 (40%)
<b>Age</b>											
Under 30 years	Number (%)		396 (3.3%)	434 (4%)	196 (2%)	312 (27.7%)	213 (21%)	131 (15%)	708 (5.4%)	647 (5%)	327 (3%)
Between 31 and 50 years	Number (%)		9,157 (76.2%)	8,470 (76%)	7,920 (78%)	766 (68%)	729 (73%)	673 (77%)	9,923 (75.5%)	9,199 (76%)	8,593 (78%)
Over 51 years	Number (%)		2,463 (20.5%)	2,258 (20%)	2,046 (20%)	49 (4.3%)	57 (6%)	72 (8%)	2,512 (19.1%)	2,315 (19%)	2,118 (19%)
<b>Number of employees - by employee seniority</b>											
Total no of employees included in the top 10% of empl. by total compensation	Number		1,201	1,112	1,017	113	100	88	1,314	1,212	1,105
Male	Number (%)		839 (69.9%)	786 (71%)	731 (72%)	65 (57.5%)	36 (36%)	56 (64%)	904 (68.8%)	822 (68%)	787 (71%)
Female	Number (%)		362 (30.1%)	326 (29%)	286 (28%)	48 (42.5%)	64 (64%)	32 (36%)	410 (31.2%)	390 (32%)	318 (29%)
Total no of employees incl. in the bottom 90% of empl. by total compensation	Number		10,815	10,050	9,145	1,014	899	788	11,829	10,949	9,933
Male	Number (%)		6,495 (60.1%)	6,107 (61%)	5,531 (60%)	348 (34.3%)	328 (36%)	300 (38%)	6,843 (57.8%)	6,435 (59%)	5,831 (59%)
Female	Number (%)		4,320 (39.9%)	3,943 (39%)	3,614 (40%)	666 (65.7%)	571 (64%)	488 (62%)	4,986 (42.2%)	4,514 (41%)	4,102 (41%)
<b>Responsibility level</b>											
Employees with position of responsibility <sup>1</sup>	Number (%)		1,586 (13.2%)	1,474 (13%)	1,696 (17%)	73 (6.5%)	69 (7%)	89 (10%)	1,659 (12.6%)	1,543 (13%)	1,785 (16%)
Male	Number (%)		1,119 (70.6%)	1,036 (70%)	1,110 (65%)	42 (57.5%)	43 (62%)	47 (53%)	1,161 (70%)	1,079 (70%)	1,157 (65%)
Female	Number (%)		467 (29.4%)	438 (30%)	586 (35%)	31 (42.5%)	26 (38%)	42 (47%)	498 (30%)	464 (30%)	628 (35%)
Employess without position of responsibility	Number (%)		10,430 (86.8%)	9,688 (87%)	8,466 (83%)	1,054 (93.5%)	930 (93%)	787 (90%)	11,484 (87.4%)	10,618 (87%)	9,253 (84%)
Male	Number (%)		6,215 (59.6%)	5,858 (60%)	5,152 (61%)	371 (35.2%)	321 (35%)	309 (39%)	6,585 (57.3%)	6,179 (58%)	5,461 (59%)
Female	Number (%)		4,215 (40.4%)	3,830 (40%)	3,314 (39%)	683 (64.8%)	609 (65%)	478 (61%)	4,898 (42.7%)	4,439 (42%)	3,792 (41%)

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

APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources		Unit	GREECE			ROMANIA			OTE GROUP		
			2019	2020	2021	2019	2020	2021	2019	2020	2021
Type of Work											
Office	Number (%)	7,053 (58.7%)	6,964 (62%)	5,871 (58%)	421 (37.4%)	357 (36%)	159 (18%)	7,474 (56.9%)	7,321 (60%)	6,030 (55%)	
Retail	Number (%)	1,156 (9.6%)	1,042 (9%)	811 (8%)	605 (53.7%)	556 (56%)	442 (50%)	1,761 (13.4%)	1,598 (13%)	1,253 (11%)	
Fieldwork/other	Number (%)	3,807 (31.7%)	3,156 (28%)	3,480 (34%)	101 (9.0%)	86 (9%)	275 (31%)	3,908 (29.7%)	3,242 (27%)	3,755 (34%)	
Employees with special needs		Number (%)	335 (2.8%)	300 (2.7%)	207 (2%)	3 (0.3%)	3 (0.3%)	2 (0.2%)	338 (2.6%)	303 (2.5%)	209 (1.9%)
Employees covered by enterprise collective labor agreements		Number (%)	9,773 (81.3%)	9,027 (81%)	9,729 (96%)	1,127 (100%)	999 (100%)	876 (100%)	10,900 (82.9%)	10,026 (82%)	10,605 (96%)
Headcount (Yearly) Average		Number	<b>12,190</b>	<b>11,605</b>	<b>10,416</b>	<b>1,436</b>	<b>1,062</b>	<b>853</b>	<b>13,626</b>	<b>12,666</b>	<b>11,268</b>
Male	Number (%)	7,459 (61.2%)	7,082 (61%)	6,386 (61%)	586 (40.8%)	388 (37%)	346 (41%)	8,045 (59%)	7,470 (59%)	6,732 (60%)	
Female	Number (%)	4,731 (38.8%)	4,523 (39%)	4,030 (39%)	851 (59.2%)	673 (63%)	507 (59%)	5,581 (41%)	5,196 (41%)	4,537 (40%)	
Total hours worked		Number		21,405,720	19,803,126		1,898,620	1,693,004		23,304,340	21,496,130
Total workforce on indeterminant term contracts		Number	<b>11,952</b>	<b>11,123</b>	<b>10,101</b>	<b>1,094</b>	<b>977</b>	<b>861</b>	<b>13,046</b>	<b>12,100</b>	<b>10,962</b>
Employment type											
Full- time	Number (%)	11,533 (96.5%)	10,815 (97%)	9,859 (98%)	1,091 (99.7%)	977 (100%)	859 (99.8%)	12,624 (96.8%)	11,792 (97%)	10,718 (98%)	
Part- time	Number (%)	419 (3.5%)	308 (3%)	242 (2%)	3 (0.3%)	0 (0%)	2 (0.2%)	422 (3.2%)	308 (3%)	244 (2%)	
Gender											
Male	Number (%)	7,300 (61.1%)	6,861 (62%)	6,215 (62%)	399 (36.5%)	352 (36%)	349 (41%)	7,699 (59%)	7,213 (60%)	6,564 (60%)	
Female	Number (%)	4,652 (38.9%)	4,262 (38%)	3,886 (38%)	695 (63.5%)	625 (64%)	512 (59%)	5,347 (41%)	4,887 (40%)	4,398 (40%)	
Responsibility level											
Employees with position of responsibility <sup>1</sup>		Number (%)	1,582 (13.2%)	1,473 (13%)	1,696 (17%)	71 (6.5%)	67 (7%)	76 (9%)	1,653 (12.7%)	1,540 (13%)	1,772 (16%)
	Male	Number (%)	1,116 (70.5%)	1,035 (70%)	1,111 (66%)	40 (56.3%)	41 (61%)	43 (57%)	1,156 (69.9%)	1,076 (70%)	1,154 (65%)
	Female	Number (%)	466 (29.5%)	438 (30%)	585 (34%)	31 (43.7%)	26 (39%)	33 (43%)	497 (30.1%)	464 (30%)	618 (35%)
Employess without position of responsibility		Number (%)	10,370 (86.8%)	9,650 (87%)	8,405 (83%)	1,023 (93.5%)	910 (93%)	770 (89%)	11,393 (87.3%)	10,560 (87%)	9,175 (84%)
	Male	Number (%)	6,184 (59.6%)	5,826 (60%)	5,104 (61%)	359 (35.1%)	311 (34%)	300 (39%)	6,543 (57.4%)	6,137 (58%)	5,404 (59%)
	Female	Number (%)	4,186 (40.4%)	3,824 (40%)	3,301 (39%)	664 (64.9%)	599 (66%)	470 (61%)	4,850 (42.6%)	4,423 (42%)	3,771 (41%)
Type of Work											
Office	Number (%)	7,033 (58.8%)	6,938 (62%)	5,835 (58%)	404 (36.9%)	342 (35%)	135 (16%)	7,437 (57%)	7,280 (60%)	5,970 (54%)	
Retail	Number (%)	1,154 (9.7%)	1,042 (9%)	811 (8%)	590 (53.9%)	550 (56%)	513 (60%)	1,744 (13.4%)	1,592 (13%)	1,324 (12%)	
Fieldwork/other	Number (%)	3,765 (31.5%)	3,143 (28%)	3,455 (34%)	100 (9.1%)	85 (9%)	304 (35%)	3,865 (29.6%)	3,228 (27%)	3,759 (34%)	
Total workforce on full- time indeterminant term contracts		Number	<b>11,533</b>	<b>10,816</b>	<b>9,859</b>	<b>1,091</b>	<b>977</b>	<b>859</b>	<b>12,624</b>	<b>11,793</b>	<b>10,718</b>
Gender											
Male	Number (%)	7,224 (62.6%)	7,153 (61%)	6,170 (63%)	397 (36.4%)	352 (36%)	349 (41%)	7,621 (60.4%)	7,153 (61%)	6,519 (61%)	
Female	Number (%)	4,309 (37.4%)	4,640 (39%)	3,689 (37%)	694 (63.6%)	625 (64%)	510 (59%)	5,003 (39.6%)	4,640 (39%)	4,199 (39%)	

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





## APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2019	2020	2021	2019	2020	2021	2019	2020	2021
<b>Total workforce on part-time indeterminant term contracts</b>	<b>Number</b>	<b>418</b>	<b>308</b>	<b>242</b>	<b>3</b>	<b>0</b>	<b>2</b>	<b>421</b>	<b>308</b>	<b>244</b>
<b>Gender</b>										
Male	Number (%)	76 (18.2%)	60 (19%)	45 (19%)	2 (66.7%)	0 (0%)	0 (0%)	78 (18.5%)	60 (19%)	45 (18%)
Female	Number (%)	342 (81.8%)	248 (81%)	197 (81%)	1 (33.3%)	0 (0%)	2 (100%)	343 (81.5%)	248 (81%)	199 (82%)
<b>Recruitment</b>	<b>Number</b>	<b>166</b>	<b>116</b>	<b>875</b>	<b>64</b>	<b>44</b>	<b>40</b>	<b>230</b>	<b>160</b>	<b>915</b>
<b>Gender</b>										
Male	Number (%)	117 (70.5%)	89 (77%)	348 (40%)	31 (48.4%)	24 (55%)	12 (30%)	148 (64.3%)	113 (71%)	360 (39%)
Female	Number (%)	49 (29.5%)	27 (23%)	527 (60%)	33 (51.6%)	20 (45%)	28 (70%)	82 (35.7%)	47 (29%)	555 (61%)
<b>Age</b>										
Under 30 years	Number (%)	60 (36.1%)	52 (45%)	102 (12%)	42 (65.6%)	20 (45%)	11 (28%)	102 (44.3%)	72 (45%)	113 (12%)
Between 31 and 50 years	Number (%)	95 (57.2%)	64 (55%)	621 (71%)	19 (29.7%)	21 (48%)	26 (65%)	114 (49.6%)	85 (53%)	647 (71%)
Over 51 years	Number (%)	11 (6.6%)	0 (0%)	152 (17%)	3 (4.7%)	3 (7%)	3 (8%)	14 (6.1%)	3 (2%)	155 (17%)
<b>Recruitment within OTE Group</b>	<b>Number (%)</b>	<b>12 (7.2%)</b>	<b>22 (19%)</b>	<b>692 (79%)</b>	<b>4 (6.3%)</b>	<b>4 (9%)</b>	<b>0 (0%)</b>	<b>16 (7%)</b>	<b>26 (16%)</b>	<b>692 (76%)</b>
<b>Departures<sup>2</sup></b>	<b>Number</b>	<b>580</b>	<b>1,084</b>	<b>1,325</b>	<b>682</b>	<b>170</b>	<b>170</b>	<b>1,262</b>	<b>1,254</b>	<b>1,495</b>
<b>Gender</b>										
Male	Number (%)	411 (70.9%)	614 (57%)	848 (64%)	350 (51.3%)	73 (43%)	66 (39%)	761 (60.3%)	687 (55%)	914 (61%)
Female	Number (%)	169 (29.1%)	470 (43%)	477 (36%)	332 (48.7%)	97 (57%)	104 (61%)	501 (39.7%)	567 (45%)	581 (39%)
<b>Age</b>										
Under 30 years	Number (%)	30 (5.2%)	57 (5%)	80 (6%)	297 (43.5%)	47 (28%)	45 (26%)	327 (25.9%)	104 (8%)	125 (8%)
Between 31 and 50 years	Number (%)	251 (43.3%)	526 (49%)	677 (51%)	347 (50.9%)	114 (67%)	119 (70%)	598 (47.4%)	640 (51%)	796 (53%)
Over 51 years	Number (%)	301 (51.9%)	501 (46%)	568 (43%)	38 (5.6%)	9 (5%)	6 (4%)	339 (26.9%)	510 (41%)	574 (38%)
<b>Voluntary Exit Programs</b>										
Departures in the context of voluntary exit programs	Number (%)	321 (55.3%)	695 (64%)	739 (56%)	191 (28%)	9 (5%)	0 (0%)	512 (40.6%)	704 (56%)	739 (49%)
<b>Type of Departure</b>										
Voluntary	Percentage	4.4%	9%	12%	36.7%	15%	19%	7.8%	9%	12%
Involuntary	Percentage	0.3%	1%	1%	10.8%	1%	1%	1.4%	1%	1%

2. Not included: Expiration of Contracts, Deaths &amp; Retirements

APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources		Unit	GREECE			ROMANIA			OTE GROUP		
			2019	2020	2021	2019	2020	2021	2019	2020	2021
Total workforce on fixed-term contracts		Number	64	39	61	33	22	15	97	61	76
<b>Gender</b>											
Male	Number (%)	34 (53.1%)	32 (82%)	47 (77%)	14 (42.4%)	12 (55%)	7 (47%)	48 (49.5%)	44 (72%)	54 (71%)	
Female	Number (%)	30 (46.9%)	7 (18%)	14 (23%)	19 (57.6%)	10 (45%)	8 (53%)	49 (50.5%)	17 (28%)	22 (29%)	
Members of the Board of Directors		Number	10	10	10				10	10	10
<b>Gender</b>											
Male	Number (%)	9 (90.0%)	8 (80%)	7 (70%)				9 (90.0%)	8 (80%)	7 (70%)	
Female	Number (%)	1 (10.0%)	2 (20%)	3 (30%)				1 (10.0%)	2 (20%)	3 (30%)	
<b>Age</b>											
Under 30 years	Number (%)	0 (0%)	0 (0%)	0 (0%)				0 (0%)	0 (0%)	0 (0%)	
Between 31 and 50 years	Number (%)	4 (40.0%)	3 (30%)	3 (30%)				4 (40.0%)	3 (30%)	3 (30%)	
Over 51 years	Number (%)	6 (60.0%)	7 (70%)	7 (70%)				6 (60.0%)	7 (70%)	7 (70%)	
Members of OTE Group Management Team		Number	15	14	14				15	14	14
<b>Gender</b>											
Male	Number (%)	12 (80.0%)	11 (79%)	11 (79%)				12 (80.0%)	11 (79%)	11 (79%)	
Female	Number (%)	3 (20.0%)	3 (21%)	3 (21%)				3 (20.0%)	3 (21%)	3 (21%)	
<b>Age</b>											
Under 30 years	Number (%)	0 (0%)	0 (0%)	0 (0%)				0	0 (0%)	0 (0%)	
Between 31 and 50 years	Number (%)	4 (26.7%)	3 (21%)	3 (21%)				4 (26.7%)	3 (21%)	3 (21%)	
Over 51 years	Number (%)	11 (73.3%)	11 (79%)	11 (79%)				11 (73.3%)	11 (79%)	11 (79%)	

APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2019	2020	2021	2019	2020	2021	2019	2020	2021
Health and Safety Issues										
Fatalities <sup>3</sup> (number of employees)	Number	1	0	0	0	0	0	1	0	0
Number of recordable work-related injuries (incl. fatalities)	Number		79	62		1	1		80	63
Male	Number (%)		61 (78%)	47 (76%)		0 (0%)	1 (100%)		61 (76%)	48 (76%)
Female	Number (%)		18 (22%)	15 (24%)		1 (100%)	0 (0%)		19 (24%)	15 (24%)
Number of employees injured	Number	114	78	59	3	1	1	117	79	60
Male	Number (%)	83 (72.8%)	60 (77%)	45 (76%)	0 (0%)	0 (0%)	1 (100%)	83 (70.9%)	60 (76%)	46 (77%)
Female	Number (%)	31 (27.2%)	18 (23%)	14 (24%)	3 (100%)	1 (100%)	0 (0%)	34 (29.1%)	19 (24%)	14 (23%)
Number of high-consequence work-related injuries	Number		0	0		0	1		0	1
Injury rate <sup>4</sup>	Number	1.01	0.73	0.00	0.24	0.11	0.12	0.93	0.68	0.59
Male	Number	1.20	0.98	0.00	0.00	0.00	0.30	1.12	0.93	0.74
Female	Number	0.70	0.34	0.00	0.40	0.17	0.00	0.66	0.32	0.35
Recordable work-related injuries (including fatalities) rate <sup>5</sup>	Number		0.74	0.63		0.11	0.12		0.69	0.59
Male	Number		0.93	0.77		0.00	0.30		0.88	0.74
Female	Number		0.43	0.40		0.17	0.00		0.40	0.35
Occupational disease rate <sup>6</sup>	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 rate <sup>7</sup>	Number	29.26	21.21	14.25	7.22	0.00	4.73	27.03	19.48	13.50
Male	Number	37.11	28.56	18.94	0.00	0.00	11.83	34.51	27.13	18.57
Female	Number	17.05	9.56	6.59	12.17	0.00	0.00	16.34	8.35	5.81
Rate of high-consequence work-related injuries (excluding fatalities)	Number		0	0		0	0		0	0
Absentee rate <sup>8</sup>		761.85	662.64	414.55	350.22	1,023.51	534.33	722.87	689.77	423.58

<sup>3</sup> Fatal work accidents do not contain incidents from strictly natural causes.

<sup>4</sup> Recordable work-related injuries (including fatalities) rate = (Total number of recordable work-related injuries (including fatalities) / 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.

<sup>5</sup> 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.

<sup>6</sup> Occupational diseases rate = (Total number of occupational diseases cases / Total number of hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees.

<sup>7</sup> Lost day rate = (Total number of lost calendar days / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees. Lost day count begins on the day of the injury or the next day, depending on the time of the day.

<sup>8</sup> Absentee rate = (Total number of missed absentee days / Total number of workforce days worked) x 25,000. The factor 25,000 is derived from 50 working weeks of 5 days per 100 employees. This rate is not monitored per gender.

APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2019	2020	2021	2019	2020	2021	2019	2020	2021
<b>Health and Safety Issues</b>										
Hours of psychological support consulting services	Hours	1,522	1,451	912	0	0	0	1,522	1,451	912
Training on Health and Safety issues (total hours)	Hours	17,723	3,540	5,615	6,278	5,536	5,964	24,001	9,076	11,579
Training on Health and Safety issues (on the basis of headcount avg)	Hrs per employee	1.45	0.31	0.54	4.37	5.21	7.00	1.76	0.72	1.03
Training on Safety issues (total employee participations)	Number		283	968		1,937	2,354		2,220	3,322
Male	Number (%)		270 (95%)	861 (89%)		848 (44%)	900 (38%)		1,118 (50%)	1,761 (53%)
Female	Number (%)		13 (5%)	107 (11%)		1,089 (56%)	1,454 (62%)		1,102 (50%)	1,561 (47%)
Training on Safety issues (total number of employees)			242	896		1,047	939		1,289	1,835
Male	Number (%)		227 (94%)	789 (88%)		446 (43%)	365 (39%)		673 (52%)	1,154 (63%)
Female	Number (%)		15 (6%)	107 (12%)		601 (57%)	574 (61%)		616 (48%)	681 (37%)
Training on Health/Wellbeing issues (total employee participations)			2,358	3,062		372			2,730	3,062
Male	Number (%)		1,680 (71%)	1,105 (36%)		35 (9%)			1,715 (63%)	1,105 (36%)
Female	Number (%)		678 (29%)	1,957 (64%)		337 (91%)			1,015 (37%)	1,957 (64%)
Training on Health/Wellbeing issues (total number of employees)			1,922	1,781		62			1,984	1,781
Male	Number (%)		1,523 (79%)	713 (40%)		17 (27%)			1,540 (78%)	713 (40%)
Female	Number (%)		399 (21%)	1,068 (60%)		45 (73%)			444 (22%)	1,068 (60%)
Training on Health/Wellbeing & Safety issues (total number of participations)			2,641	4,030		2,309	2,354		4,950	6,384
Male	Number (%)		1,950 (74%)	1,966 (49%)		883 (38%)	900 (38%)		2,833 (57%)	2,866 (45%)
Female	Number (%)		691 (26%)	2,064 (51%)		1,426 (62%)	1,454 (62%)		2,117 (43%)	3,518 (55%)
Training on Health/Wellbeing & Safety issues (total number of employees)			2,164	2,636		1,109	939		3,273	3,575
Male	Number (%)		1,750 (81%)	1,470 (56%)		463 (42%)	365 (39%)		2,213 (68%)	1,835 (51%)
Female	Number (%)		414 (19%)	1,166 (44%)		646 (58%)	574 (61%)		1,060 (32%)	1,740 (49%)

## APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources		Unit	GREECE			ROMANIA			OTE GROUP		
			2019	2020	2021	2019	2020	2021	2019	2020	2021
<b>Employee training</b>											
Total participations	Number	13,765	9,163	9,467	6,131	4,291	9,992	19,896	13,454	19,459	
<b>Gender</b>											
Male	Number (%)	7,445 (54.1%)	5,152 (56%)	5,685 (60%)	2,253 (36.7%)	1,846 (43%)	2,598 (26%)	9,698 (48.7%)	6,998 (52%)	8,283 (43%)	
Female	Number (%)	6,320 (45.9%)	4,011 (44%)	3,782 (40%)	3,878 (63.3%)	2,445 (57%)	7,394 (74%)	10,198 (51.3%)	6,456 (48%)	11,176 (57%)	
<b>Responsibility level</b>											
Employees with position of responsibility <sup>8</sup>	Number (%)	2,504 (18.2%)	1,222 (13%)	1,695 (18%)	249 (4.1%)	486 (11%)		2,753 (13.8%)	1,708 (13%)	1,695 (9%)	
Employees without position of responsibility	Number (%)	11,261 (81.8%)	7,941 (87%)	7,772 (82%)	5,882 (95.9%)	3,805 (89%)		17,143 (86.2%)	11,746 (87%)	7,772 (40%)	
<b>Type of Work</b>											
Office	Number (%)	10,683 (77.6%)	8,012 (87%)	7,401 (78%)	1,450 (23.7%)	1,179 (27%)		12,133 (61%)	9,191 (68%)	7,401 (38%)	
Retail	Number (%)	2,542 (18.5%)	441 (5%)	411 (4%)	4,339 (70.9%)	3,059 (72%)		6,881 (34.6%)	3,500 (26%)	411 (2%)	
Fieldwork/other	Number (%)	541 (3.9%)	708 (8%)	1,655 (17%)	342 (5.6%)	53 (1%)		883 (4.4%)	761 (6%)	1,655 (9%)	
Total employees who participated in training	Number (%)	6,886 (56.5%)	5,229 (45%)	5,202 (50%)	1,436 (100%)	780 (73%)	853 (100%)	8,322 (61.1%)	6,009 (47%)	6,055 (54%)	
<b>Gender</b>											
Male	Number (%)	4,104 (59.6%)	2,867 (55%)	3,094 (59%)	586 (40.8%)	312 (40%)	222 (26%)	4,690 (56.4%)	3,179 (53%)	3,316 (55%)	
Female	Number (%)	2,782 (40.4%)	2,362 (45%)	2,108 (41%)	851 (59.2%)	468 (60%)	631 (74%)	3,633 (43.6%)	2,830 (47%)	2,739 (45%)	
Total training hours	Number	153,271	143,007	172,816	19,964	17,646	40,461	173,235	160,653	213,277	
<b>Gender (hours)</b>											
Male	Hours (%)	107,377 (70.1%)	75,127 (53%)	94,867 (55%)	7,361 (36.9%)	9,602 (54%)	10,520 (26%)	114,738 (66.2%)	84,729 (53%)	105,387 (49%)	
Female	Hours (%)	45,894 (29.9%)	67,880 (47%)	77,949 (45%)	12,603 (63.1%)	8,044 (46%)	29,941 (74%)	58,497 (33.8%)	75,924 (47%)	107,890 (51%)	
<b>Type of work (hours)</b>											
Office	Hours (%)	115,953 (75.6%)	127,404 (89%)	142,085 (89%)	3,377 (16.9%)	8,706 (49%)		119,330 (68.8%)	136,110 (85%)	142,085 (71%)	
Retail	Hours (%)	32,117 (21.0%)	6,027 (4%)	7,767 (5%)	15,970 (80%)	8,849 (50%)		48,087 (27.8%)	14,876 (9%)	7,767 (4%)	
Fieldwork/other	Hours (%)	5,201 (3.4%)	9,576 (7%)	22,964 (14%)	618 (3.1%)	91 (1%)		5,819 (3.4%)	9,667 (6%)	22,964 (11%)	
Training hours average (on the basis of headcount average)	Hours per employee	12.57	12.32	16.59	13.90	16.62	47.46	12.71	12.68	18.93	
<b>Training per employee by gender (on the basis of headcount average)</b>											
Male	Hours per employee	14.40	10.61	14.85	12.56	24.73	30.44	14.26	11.34	15.65	
Female	Hours per employee	9.70	15.01	19.34	14.82	11.95	59.06	10.48	14.61	23.78	

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



APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources		Unit	GREECE			ROMANIA			OTE GROUP		
			2019	2020	2021	2019	2020	2021	2019	2020	2021
<b>Employee training</b>											
Training per employee by type of work (on the basis of headcount on 31st December)											
Office	Hours per employee	16.44	18.29	24.20	8.02	24.39		15.97	18.59	23.56	
Retail	Hours per employee	27.78	5.78	9.58	26.40	15.92		27.31	9.31	6.20	
Fieldwork/other	Hours per employee	1.37	3.03	6.60	6.12	1.06		1.49	2.98	6.12	
Total employee training expenditure	Euros (€)	<b>4,341,209.5</b>	<b>3,263,027</b>	<b>4,012,198</b>				<b>4,341,210</b>	<b>3,263,027</b>	<b>4,012,198</b>	
Total training hours by employee seniority											
Average training hours for employees included in the top 10% of employees by total compensation	Hours per employee	<b>20.92</b>	<b>14.66</b>	<b>13.52</b>	<b>17.66</b>	<b>17.65</b>		<b>20.64</b>	<b>14.91</b>	<b>13.52</b>	
Average training hours for employees included in the bottom 90% of employees by total compensation	Hours per employee	<b>11.60</b>	<b>12.61</b>	<b>17.39</b>	<b>17.72</b>	<b>17.67</b>		<b>12.13</b>	<b>13.02</b>	<b>17.39</b>	
<b>Other data</b>											
Internships											
University and technical school students who carried out their internship at OTE Group	Number	606	395	23	9	12	2	615	407	25	
Parental leave											
Employees who made use of parental leave for childcare		<b>552</b>	<b>680</b>	<b>589</b>	<b>77</b>	<b>59</b>	<b>9</b>	<b>629</b>	<b>739</b>	<b>598</b>	
Male	Number	315	342	280	8	2	0	323	344	280	
Female	Number	237	338	309	69	57	9	306	395	318	
Employees who made use of parental leave without pay		<b>154</b>	<b>39</b>	<b>51</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>155</b>	<b>40</b>	<b>51</b>	
Male	Number	2	4	6	0	0	0	2	4	6	
Female	Number	152	35	45	1	1	0	153	36	45	
Employees who made use of parental leave for child upbringing at 1/3 pay		<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	
Male	Number	0	0	0	0	0	0	0	0	0	
Female	Number	1	0	0	0	0	0	1	0	0	
Employees who returned to work after the use of parental leave		<b>445</b>	<b>561</b>	<b>474</b>	<b>99</b>	<b>82</b>	<b>7</b>	<b>544</b>	<b>643</b>	<b>481</b>	
Male	Number	280	337	273	9	5	0	289	342	273	
Female	Number	165	224	201	90	77	7	255	301	208	

# Environmental Performance Data

## 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.
- 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 (57 special constructions in Greece).
- Appropriate modifications are also applied to existing telecommunication infrastructure (2 special constructions in Greece).

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

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

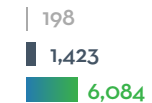
### NO<sub>x</sub>



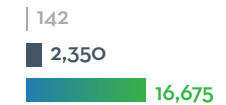
### SO<sub>2</sub>



### PM<sub>10</sub>



### VOCs



Emissions (in kg)

Space heating

Electricity generators

Vehicles

APPENDIX | ENVIRONMENTAL PERFORMANCE DATA

OTE Group Environmental Performance Data - Waste

OTE WASTE		GREECE			ROMANIA			OTE GROUP		
Category	Materials / Waste streams <sup>1</sup>	2019	2020	2021	2019	2020	2021	2019	2020	2021
<b>Materials / Resources consumption</b>										
	Water (m <sup>3</sup> )	174,501	160,084	158,535	9,088	4,972	3,961	183,589	165,056	162,496
	Paper	164,189	110,714	121,551	99,500	73,590	13,775	263,689	184,304	135,326
	Packaging materials	208,210	166,628	631,494	27,052	8,779	2,025	235,262	175,407	633,519
<b>Hazardous<sup>7</sup></b>		<b>1,629,397</b>	<b>1,432,101</b>	<b>926,254</b>	<b>0</b>	<b>82,520</b>	<b>122</b>	<b>1,629,397</b>	<b>1,514,621</b>	<b>926,376</b>
	Technical - Hazardous									
	Lead batteries	793,272	735,027	301,575	0	82,520	0	793,272	817,547	301,575
	Various <sup>2</sup>	827,950	685,705	620,575	0	0	0	827,950	685,705	620,575
	Non technical - Hazardous									
	Lubricants	6,368	5,468	3,159	0	0	122	6,368	5,468	3,281
	Refrigerants and various chemicals	1,807	5,901	945	0	0	0	1,807	5,901	945
<b>Technical<sup>7</sup></b>		<b>2,376,322</b>	<b>3,061,343</b>	<b>1,284,384</b>	<b>123,205</b>	<b>73,466</b>	<b>117,171</b>	<b>2,499,526</b>	<b>3,134,809</b>	<b>1,401,555</b>
	Telecom network									
	Metals	966,066	1,328,848	950,161	29,400	22,594	54,950	995,466	1,351,442	1,005,111
	Cables	1,147,123	1,402,736	0	2,560	200	0	1,149,683	1,402,936	0
	WEEE <sup>3</sup>	162,271	212,928	241,275	63,425	43,783	61,924	225,696	256,711	303,199
	Shops									
	Phones and accessories	35,001	26,795	28,774	22	1	69	35,023	26,796	28,843
	Home batteries	29,571	21,253	21,569	0	44	228	29,571	21,297	21,797
	Obsolete merchandise <sup>4</sup>	36,291	68,784	42,606	27,798	6,844	0	64,089	75,628	42,606
<b>Paper</b>		<b>293,746</b>	<b>183,844</b>	<b>166,515</b>	<b>99,500</b>	<b>73,590</b>	<b>13,775</b>	<b>393,246</b>	<b>257,434</b>	<b>180,290</b>
	Solid waste disposal sites	160,617	109,676	62,586	74,552	59,978	11,531	235,169	169,654	74,117
	Recycling	133,129	74,168	103,929	24,948	13,612	2,244	158,077	87,780	106,173

APPENDIX | ENVIRONMENTAL PERFORMANCE DATA

OTE WASTE		GREECE			ROMANIA			OTE GROUP		
Category	Materials / Waste streams <sup>1</sup>	2019	2020	2021	2019	2020	2021	2019	2020	2021
<b>Residual</b>		<b>621,393</b>	<b>643,375</b>	<b>700,734</b>	<b>205,394</b>	<b>190,622</b>	<b>404,364</b>	<b>826,787</b>	<b>833,997</b>	<b>1,105,098</b>
	Packaging materials, recycled									
	Offices	7,431	12,370	11,711	1,436	1,647	1,515	8,867	14,017	13,226
	Warehouses	202,250	360,695	365,200	35,039	13,919	920	237,289	374,614	366,120
	Municipal Solid Waste <sup>5</sup>									
	Offices	204,146	108,517	97,033				373,001	283,550	498,962
	Warehouses	204,960	160,224	225,224	168,855	175,034	401,929	204,960	160,224	225,224
	Ink-cartridges, recycled									
	Offices <sup>6</sup>	1,622	840	939	64	23	0	1,686	862	939
	Customers (take-back)	984	729	627	0	0	0	984	729	627
<b>Other</b>		<b>66,237</b>	<b>42,714</b>	<b>5,255</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>66,237</b>	<b>42,714</b>	<b>5,255</b>
	End of life vehicles, recycled	66,237	42,714	5,255	0	0	0	66,237	42,714	5,255
	Tires and other waste	0	0	0	0	0	0	0	0	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

7. For 2021, hazardous waste is 33% recycled & 67% is managed by other recovery operations, while for technical waste is 100% recycled and reused.

APPENDIX | ENVIRONMENTAL PERFORMANCE DATA

OTE Group Environmental Performance Data - Energy

Category		Units	GREECE			ROMANIA			OTE GROUP			
			2019	2020	2021	2019	2020	2021	2019	2020	2021	
<b>Energy consumption<sup>1</sup></b>		<b>GWh</b>	<b>554.54</b>	<b>494.64</b>	<b>495.58</b>	<b>111.28</b>	<b>124.61</b>	<b>108.47</b>	<b>665.82</b>	<b>619.25</b>	<b>604.05</b>	
	<b>Electricity</b>											
		Telecom network	GWh	418.58	370.71	369.42	91.59	110.00	94.90	510.17	480.71	464.32
		Buildings <sup>2</sup>	GWh	71.61	67.37	65.69	12.12	10.52	9.03	83.73	77.89	74.72
	<b>Stationary installations</b>											
		Heating oil	GWh	2.84	3.03	2.41				2.84	3.03	2.41
		Natural gas	GWh	5.00	4.46	5.42	1.12	0.58	0.78	6.12	5.04	6.20
		District heating	GWh	0.38	0.31	0.36				0.38	0.31	0.36
		Diesel for electricity generators	GWh	17.29	14.70	17.56	0.29	0.11	0.09	17.58	14.81	17.65
	<b>Road transportation</b>											
		Unleaded gasoline	GWh	12.24	9.88	10.98	0.03	0.01	0.91	12.28	9.90	11.89
	Diesel	GWh	26.59	24.17	23.74	6.13	3.39	2.77	32.73	27.56	26.51	
<b>GHG emissions<sup>3</sup></b>												
	<b>Direct emissions</b>											
		Space heating <sup>4</sup>	t CO <sub>2</sub> eq	1,775	1,717	1,745	227	118	157	2,002	1,835	1,902
		Electricity generators <sup>4</sup>	t CO <sub>2</sub> eq	4,639	3,944	4,711	77	30	24	4,716	3,974	4,735
		Vehicles <sup>4</sup>	t CO <sub>2</sub> eq	9,788	8,594	8,751	1,581	873	931	11,369	9,467	9,682
		HFCs - AC systems <sup>5</sup>	t CO <sub>2</sub> eq	10,401	10,133	9,060	0	0	0	10,401	10,133	9,060
	<b>Indirect (scope 2) emissions, location-based<sup>6</sup></b>											
		Telecom network	t CO <sub>2</sub> eq	223,239	202,373	183,548	31,489	36,839	32,395	254,729	239,212	215,943
		Buildings	t CO <sub>2</sub> eq	38,273	36,844	32,660	4,167	3,522	3,116	42,440	40,366	35,776
	<b>Indirect (scope 2) emissions, market-based<sup>6</sup></b>											
			t CO <sub>2</sub> eq	2,358	66	76	41,753	37,599	0	44,110	37,665	76
<b>Scope 3 emissions</b>												
		t CO <sub>2</sub> eq	751,978	699,445	589,610	N.A.	N.A.	161,965	968,193	1,045,940	751,575	



APPENDIX | ENVIRONMENTAL PERFORMANCE DATA

Category	Units	GREECE			ROMANIA			OTE GROUP		
		2019	2020	2021	2019	2020	2021	2019	2020	2021
<b>Transport</b>	<b>GWh</b>									
<b>Service vehicles</b>										
Unleaded gasoline vehicles	#	734	760	745	6	1	113	740	761	858
Diesel vehicles	#	2,059	2,010	1,997	372	340	275	2,431	2,350	2,272
Distance covered	km	38,550,353	28,950,064	36,339,077	8,318,611	4,524,218	5,120,778	46,868,964	33,474,282	41,459,855
<b>Company vehicles</b>										
Unleaded gasoline vehicles	#	196	196	214	4	2	2	200	198	216
Diesel vehicles	#	152	145	119	66	43	20	218	188	139
Distance covered	km	7,196,788	5,052,504	5,241,423	1,100,313	649,832	348,604	8,297,101	5,702,336	5,590,027

1. 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
2. The term "Buildings" describes Offices, Data Centers, Warehouses and Shops
3. GHG emissions calculated include CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O and f-gases from AC systems. To ensure harmonized reporting among DT Group companies, Global Warming Potential (GWP) values used, are those included in the 5th Assessment Report (AR) of IPCC. Past values (originally estimated with AR4 GWP values) have been recalculated
4. 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
5. Emissions are calculated on the basis of data concerning replenished quantities
6. Location-based CO<sub>2</sub> emissions are estimated on the basis of the emission factors developed by the International Energy Agency (IEA), while market-based emissions are estimated according to the AIB European Residual Mixes. The non-CO<sub>2</sub> (i.e. CH<sub>4</sub> and N<sub>2</sub>O) emission factors for electricity derive from IEA

APPENDIX | ENVIRONMENTAL PERFORMANCE DATA

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 have been installed (COSMOTE). Smart metering systems are already installed in 32 locations (Romania).
Air-Condition Temperature Set-Point / Automation	Telecom network	Greece	An algorithm which takes as input the telecom equipment temperature and gives as output the optimum air-condition set point for telecom rooms.
Telecom Rooms Consolidation	Telecom network	Greece	Air-condition power off in telecom & rectifier rooms with low heat load.
Legacy Network Power off	Telecom network	Greece, Romania	Switching off unused telecom equipment
Infrastructure Modernization / Optimization	Telecom network	Greece, Romania	Improvement of cooling air flow. Improve Room thermal insulation. Rectifiers replacement with new high efficiency. Redimensioning of rectifiers and batteries.
Free Cooling & Site Survey Teams	Telecom network	Greece, Romania	Free cooling systems are used for cooling telecom rooms by the use of low external air temperature from the environment, thus reducing the energy consumption of the compressor-based air conditioning unit. Site surveys are conducted in order to identify energy efficiency measures.
Mobile Modernization	Telecom network	Greece, Romania	Mobile telecom equipment modernization using lower power consumption hardware.
RAN Energy Features	Telecom network	Greece, Romania	Deactivation of capacity layers in low traffic periods.
Rational use of buildings and space consolidation	Telecom network - Buildings	Greece	Consolidation (geographical and spatial) of the hardware necessary for network management.
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 measures in buildings and shops	Buildings / Shops	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"> <li>• Buildings envelope energy upgrade.</li> <li>• Modernization of HAVC systems improving energy efficiency.</li> <li>• Energy Design of Constructural Works in buildings and selection of highly efficient E/M Equipment.</li> <li>• LED lighting systems in renovated buildings.</li> <li>• Smart metering devices and automation in lighting, air-conditioning, generators and other systems for better supervision and improvement of operational efficiency.</li> </ul>



## APPENDIX | ENVIRONMENTAL PERFORMANCE DATA

ENERGY CONSERVATION MEASURES	SCOPE	COUNTRY	RESULT
Energy measures in Data Centers	Data Centers	Greece, Romania	Energy conservation measures aiming to improve the PUE of data centers.
Energy management	All types of installations	Greece, Romania	Perform Energy Audits and detect measures that should be taken in order to improve the energy efficiency of the installed equipment, Apply Energy Management System according to ISO 50001 standard, Installation of BEMS systems in critical sites.
Teleconferences	Mobility	Greece	In 2021, 2,845 audio-conferences were held.

# Task Force on Climate Related Financial Disclosures (TCFD) Index

OTE Group fully recognizes the importance of the TCFD recommendations with respect to effective and transparent climate-related disclosures as well as promoting more informed investment decisions. As such, OTE Group discloses its practices against the TCFD recommendations, enabling its stakeholders to better understand the Groups actions with regards to tackling climate change as well as its exposure to climate-related risks and their subsequent financial implications. Detailed information can be found in the table below.



PILLAR 1 – GOVERNANCE	COMMENTS/SECTIONS
A) Describe the board’s oversight of climate-related risks and opportunities.	<p><b>Compliance Enterprise Risks and Corporate Governance Committee</b>  <b>Sustainability Governance</b>                      Relevant information can be found in the latest response of OTE to CDP (Section C1)</p>
B) Describe management’s role in assessing and managing climate-related risks and opportunities.	<p><b>Compliance Enterprise Risks and Corporate Governance Committee</b>  <b>Sustainability Governance</b>                      Relevant information can be found in the latest response of OTE to CDP (Section C1)</p>
PILLAR 2 – STRATEGY	COMMENTS/SECTIONS
A) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	<p><b>Environmental Strategy</b>  <b>Energy and Climate Change</b>                      Information concerning climate change risks and opportunities identified, can be found in the latest response of OTE to CDP (Section C2)</p>
B) Describe the impact of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning.	<p><b>Environmental Strategy</b>  <b>Energy and Climate Change</b>                      Information concerning climate change risks and opportunities identified, can be found in the latest response of OTE to CDP (Section C3)</p>
C) Describe the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	<p>Business strategy is not formally making use of climate scenarios, though scenarios results (e.g. RCP scenarios as defined in the 5th Assessment Report of IPCC) have been used to provide inputs to the environmental risk assessment process, especially with respect to expected physical impacts. At the moment, business strategy is more related to official policy targets as announced by the European Union and state authorities in the countries OTE Group operates. The climate risk assessment related to different climate scenarios for OTE Group operations is in progress.</p>

APPENDIX | TASK FORCE ON CLIMATE RELATED FINANCIAL DISCLOSURES (TCFD) INDEX

PILLAR 3 – RISK MANAGEMENT	COMMENTS/SECTIONS
A) Describe the organization’s processes for identifying and assessing climate-related risks.	<ul style="list-style-type: none"> <li>Stakeholder Management &amp; Engagement</li> <li>Enterprise Risk Management</li> <li>Environmental Strategy</li> <li>2021 Annual Financial Report (p. 15-25, 38-39)</li> </ul>
B) Describe the organization’s processes for managing climate-related risks.	<ul style="list-style-type: none"> <li>Responsible Purchasing and Supply Chain Management</li> <li>Business Continuity</li> <li>Environmental Strategy</li> <li>Energy and Climate Change</li> </ul>
C) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management.	<ul style="list-style-type: none"> <li>Stakeholder Management &amp; Engagement</li> <li>Enterprise Risk Management</li> <li>2021 Annual Financial Report (p. 15-25, 38-39)</li> </ul>
PILLAR 4 – METRICS AND TARGETS	COMMENTS/SECTIONS
A) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	<ul style="list-style-type: none"> <li>Energy and Climate Change</li> <li>Environmental Performance Data – Energy</li> <li>2021 Annual Financial Report (p. 15-25, 38-39)</li> <li>(Initial estimate of green revenues according to EU Taxonomy principles)</li> </ul>
B) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	<ul style="list-style-type: none"> <li>Environmental Strategy</li> <li>Energy and Climate Change</li> <li>Environmental Performance Data – Energy</li> </ul>
C) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	<ul style="list-style-type: none"> <li>Key Achievements and Targets</li> <li>Energy and Climate Change</li> </ul>



# Independent Assurance Report

The 2021 OTE Group Integrated Report (“IR 2021”) has been prepared by OTE Group’s Management, which is responsible for the collection and presentation of the information contained therein. Our responsibility is limited in carrying out a limited assurance engagement on specific scope of the IR 2021. The IR 2021 relates to the OTE Group, OTE Group and the entities comprising it is defined in the IR 2021.

## Scope of Work

Our engagement was designed to provide limited assurance on a specific scope of the IR 2021 for OTE, COSMOTE and selected OTE Group entities’ data, as specified below:

1. The provision of Type 2 Moderate Assurance, in accordance with AA1000 Assurance Standard v3, on the adherence of the IR 2021 to AA1000 AccountAbility Principles (2018), as described in the section titled “Accountability Principles Standard AA1000 Index” in the Appendix of the IR 2021.
2. The provision of limited assurance on the reliability of the quantitative data and the reasonability of statements related to the Global Reporting Initiative (“GRI”) General Disclosures (2016) that are required as a minimum prerequisite for the “In accordance – Core” option, as indicated in the section titled “Global Reporting Initiative Content Index” in the Appendix of the IR 2021.
3. The provision of limited assurance on the

reliability of quantitative data and the reasonability of statements that correspond to the following nine (9) material topics, that were identified by OTE Group through the re-evaluation of FY2020 materiality analysis’ results, for OTE and COSMOTE MOBILE TELECOMMUNICATIONS S.A. (“COSMOTE”), against the requirements of the respective GRI Standards for the Specific Disclosures and the requirements of GRI 103 Standard “Management Approach (2016)” (“MA”), as indicated in the section titled “Global Reporting Initiative Content Index” in the Appendix of the IR 2021:

- Ethical Business Practices (MA, GRI 205-1 (2016), GRI 205-3 (2016), GRI 206-1 (2016), GRI 419-1 (2016))
- Fair Employment and Employee Management (MA, GRI 401-1 (2016), GRI 405-1 (2016))
- Employee training and skills development (MA and GRI 404-1 (2016))
- Employee Health, Safety and Wellness (MA, GRI 403-1 (2018)–GRI 403-7 (2018) and GRI 403-9 (2018))
- Data security and privacy (MA and GRI 418-1 (2016))
- Customer service and satisfaction (MA and Results of surveys measuring customer satisfaction (2021 Customer survey results on the question- “How would you evaluate the company as to: whether the company makes me feel like I am in good hands)
- Business continuity (MA, No GRI Topic Specific Disclosure available)

- Electromagnetic fields (MA, GRI 416-1 (2016) and 416-2 (2016))
  - Energy and climate change (MA, GRI 302-1 (2016), GRI 302-3 (2016), GRI 305-1 (2016), GRI 305-2 (2016), GRI 305-4 (2016))
4. The provision of limited assurance on the reliability of quantitative data and the reasonability of statements that correspond to the following four (4) additional Topic Specific Disclosures, for OTE and COSMOTE, against the requirements of the respective GRI Standards for the Specific Disclosures, as indicated in the section titled “Global Reporting Initiative Content Index” in the Appendix of the IR 2021: GRI 306-2 (2020), 306-3 (2020),306-4 (2020), 306-5 (2020).
  5. The provision of limited assurance on the reliability of the consolidation method used to report Group quantitative data for all the above mentioned GRI Topic Specific Disclosures.
  6. The provision of limited assurance on the adherence of the IR 2021 to the Athens Stock Exchange ESG Reporting Guide 2022. In particular, we evaluated the reliability of the disclosed ATHEX ESG metrics, regarding environmental, social and governance issues, as disclosed in the section titled “ATHEX Guide Index” in the Appendix of the IR 2021.
  7. The provision of limited assurance on the adherence of the IR 2021 to the United Nations Global Compact (UNGC) Communication on Progress (CoP) requirements, against the requirements of the criteria for the “Advanced” level, mentioned in the “GC Advanced COP

Self-assessment” document, as disclosed in the section titled “United Nations Global Compact - Communication on Progress (CoP)” in the Appendix of the IR 2021.

8. The provision of limited assurance on the alignment between the United Nations’ (UN) Sustainability Development Goals and OTE Group’s sustainability strategy.
9. The provision of limited assurance on the reliability of the quantitative data for OTE, COSMOTE, GERMANOS S.A. (“GERMANOS”), OTE INTERNATIONAL SOLUTIONS S.A. (“OTEGLOBE”), OTE ACADEMY S.A. (“OTE Academy”), COSMOTE E-VALUE SERVICES CONTACT CENTER S.A. (“COSMOTE e-Value), COSMOTE TECHNICAL SERVICES S.A. (“CTS”) and TELEKOM ROMANIA MOBILE COMMUNICATIONS S.A. (“Telekom Romania Mobile Communications”), relating to the following non-financial indicators:

- Employees covered by collective bargaining agreements (%)
- Women employees (%)
- Fatalities (number of employees)
- Number of employees injured
- 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 (location-based) CO<sub>2</sub> emissions from energy (t)
- Direct and indirect (market-based) CO<sub>2</sub> emissions from energy (t)

## APPENDIX | INDEPENDENT ASSURANCE REPORT

- Recycling of phone devices and accessories (t)
- EMF measurements (number of measurements)
- Suppliers evaluated (% of the annual procurement value)

The quantitative data on the above non-financial indicators are included within the IR 2021. Certain non-financial indicators form part of the relevant GRI General or Topic-Specific Disclosures. For certain non-financial indicators, which are not covered by a relevant GRI General or Topic-Specific Disclosure, OTE has developed the methods of calculation of these non-financial indicators. The disclosure of these methods of calculation can be found in the OTE Group of Companies Annual Financial Report 2021 (“Annual Report 2021”).

Our work was related to assurance on data and information for the period 1 January 2021 – 31 December 2021 and we do not provide assurance over any prior reporting period data or information presented in the IR 2021.

We performed assurance services in accordance with the provisions of “International Standard on Assurance Engagements ISAE 3000– Assurance Engagements Other than Audits or Reviews of Historical Financial Information” (“ISAE 3000”), issued by the International Auditing and Assurance Standards Board (IAASB) and the requirements for a Type 2 Moderate assurance under AA1000 Assurance Standard v3. Our procedures for collecting evidence were designed in order to obtain a limited level of assurance.

The procedures in a limited assurance engagement in accordance with ISAE 3000, vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained, had a reasonable assurance engagement been performed. The moderate level of assurance in AA1000 Assurance Standard v3 is consistent with limited assurance in ISAE 3000.

### Our key assurance procedures

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In order to form our conclusions, we undertook the following procedures:

- Reviewed the processes of OTE Group for identifying and determining material topics to be included in the IR 2021 and the coverage of these material topics within the IR 2021. Also, we performed a media review for topics relevant to OTE and COSMOTE regarding issues of corporate responsibility and sustainable development and we compared the results from the media review with the material topics identified by OTE Group;
- Performed interviews with employees from various organisational levels of OTE Group with regards to stakeholder inclusivity, materiality, responsiveness and impact;
- Assessed adherence to the AA1000 AccountAbility Principles (2018) and reviewed the reliability and quality of information disclosed, based on relevant supporting documentation and inquiries performed for OTE Group;

- Performed interviews with personnel of OTE Group responsible for managing, collecting and processing data relating to the GRI General and Specific Disclosures, under the scope of our engagement, in order to obtain an understanding of the processes applied for the preparation of the relevant Disclosures of the IR 2021;
- Performed analytical review procedures on the quantitative data related to the GRI General and Specific Disclosures, under the scope of our engagement, and made pertinent inquiries to responsible personnel. In addition, we tested, on a sample basis, the accuracy of the quantitative data against corresponding supporting documentation;
- Performed interviews with the relevant personnel in order to obtain an understanding of OTE Group corporate responsibility and sustainable development policies and activities for the reporting period and the statements related to the GRI General and Specific Disclosures, under the scope of our engagement. We also assessed the reasonability of the statements related to the GRI General and Specific Disclosures, under the scope of our engagement, by obtaining for a sample of statements, corresponding supporting documentation;
- Reviewed the IR 2021 for the appropriate presentation of the GRI General and Specific Disclosures, under the scope of our engagement, including discussions with the relevant personnel about limitations and assumptions relating to the way these data are presented;

- Reviewed, on a sample basis, the consolidation method used to include OTE Group quantitative data into the IR 2021 for the GRI Topic-Specific Disclosures under the scope of our engagement;
- Reviewed, on a sample basis, the reliability of the disclosed ATHEX ESG metrics, regarding environmental, social and governance issues, as disclosed in the section titled “ATHEX Guide Index” in the Appendix of the IR 2021;
- Reviewed the adherence of the IR 2021 to the United Nations Global Compact (UNGC) Communication on Progress (CoP) requirements, against the requirements of the criteria for the “Advanced” level, mentioned in the “GC Advanced COP Self-assessment” document, as disclosed in the section titled “United Nations Global Compact – Communication on Progress (CoP)” in the Appendix of the IR 2021;
- Reviewed the alignment between the United Nations’ (UN) Sustainability Development Goals and OTE Group’s sustainability strategy;
- Performed interviews with responsible personnel and obtained, on a sample basis, relevant supporting documentation for the quantitative data reported for OTE, COSMOTE, GERMANOS, OTEGLOBE, OTE Academy, COSMOTE e-Value, CTS and Telekom Romania Mobile Communications for the following non-financial indicators:
  - Employees covered by collective bargaining agreements (%)
  - Women employees (%)
  - Fatalities (number of employees)
  - Number of employees injured (number of employees)
  - Court convictions for corruption against the

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company or its employees in relation to their professional activities (number of convictions)

- Social contribution (€)
- Electricity consumption (GWh)
- Direct and indirect (location-based) CO<sub>2</sub> emissions from energy (t)
- Direct and indirect (market-based) CO<sub>2</sub> emissions from energy (t)
- Recycling of phone devices and accessories (t)
- EMF measurements (number of measurements)
- Suppliers evaluated (% of the annual procurement value)

### Limitations

- Our assurance services were limited to the English version of the IR 2021. In the event of any inconsistency between the English and Greek versions, as far as our conclusions are concerned, the English version prevails.
- Where, under the scope of our engagement, financial information was used from the Annual Report 2021 and other published information of OTE Group entities included in IR 2021, our work was limited to check the accuracy of the transfer of the relevant information to the IR 2021.
- Our assurance procedures did not include testing the Information Technology systems from which data was extracted and aggregated by OTE Group for the IR 2021.
- The scope of our work did not include any procedures on the accuracy of the survey results assigned to third parties, nor Information

Technology systems used by third parties, but was instead limited to the proper transposition of the final results to the IR 2021.

- We do not provide any assurance relating to future performance, such as estimates, expectations or targets, or their achievability.

### Our independence and quality control

- Deloitte applies International Standard on Quality Control 1 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, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. We have maintained our independence and objectivity and, in particular, there were no events or prohibited services provided which could impair our independence and objectivity.

### Our team

Our team consisted of professionals with assurance qualifications and a combination of environmental, sustainability and stakeholder

engagement experience, including an extensive experience in providing sustainability assurance.

### Roles and responsibilities

OTE

OTE Group's Management is responsible for the preparation of the IR 2021 in accordance with the following principles, guidelines and directives:

- The GRI Sustainability Reporting Standards ("GRI Standards")
- The AA1000 AccountAbility Principles (2018) of Inclusivity, Materiality, Responsiveness and Impact
- The United Nation's Global Compact Principles
- The Athens Stock Exchange (ATHEX) ESG Reporting Guide 2022
- The criteria of the Greek Sustainability Code.
- In addition, the guidelines of the Task Force on Climate-related Financial Disclosures (TCFD) were also considered.

In addition, OTE Group's Management is responsible for the information and statements contained within the IR 2021 and for establishing and maintaining appropriate performance management and internal control systems used for the production of the reported information.

Deloitte

Our responsibility is to independently express our conclusion to OTE's Management in relation to the assurance services defined in the Scope of Work above, in accordance with our letter of engagement. Our work has been undertaken in

order to inform OTE's Management on the results of the limited assurance engagement and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than OTE for our work, for this statement or for the conclusions we have reached.

### Key observations in relation to AA1000

Based on the work described above, the key observations regarding the principles of Inclusivity, Materiality, Responsiveness and Impact set out in the AA1000AS v3 are as follows:

- **Inclusivity:** OTE Group is committed towards being accountable to its stakeholders. The Group has implemented a comprehensive and efficient stakeholder engagement process, is well aware of its stakeholder concerns and expectations and consistently integrates the views of stakeholders at all levels.
- **Materiality:** OTE Group has established a process for determining materiality that is applied across the organization on an ongoing basis. In particular, the Group identifies the most important issues of its sustainable development through the materiality assessment process carried out in accordance with the Group's unified Enterprise Risk Management methodology.
- **Responsiveness:** OTE Group has established a process for responding to the topics raised by its stakeholders. The Group's responses were found

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to be related to the stakeholders' concerns and issues and were conducted in a timely, fair and appropriate manner.

- **Impact:** OTE Group has robust processes in place for understanding, measuring and managing its impacts, including risk management and development of action plans. A wide range of sustainability impacts are presented in the Integrated Report, both qualitatively and quantitatively, in alignment with the Group's strategy. It is recommended OTE Group to continue to report on the progress against its sustainability impacts as well as monitor and measure the social changes that result from its activities and the long-term impacts on its stakeholders and on business itself.

## Our conclusions

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Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that:

- The IR 2021 does not adhere, in all material respects, to the AA1000 AccountAbility Principles (2018) and that the relevant information disclosed is materially misstated.
- The GRI General and Specific Disclosures, under the scope of our engagement, are materially misstated.
- The consolidation method used to report Group quantitative data, for all the GRI Topic Specific Disclosures under the scope of our engagement, is materially misstated.
- The IR 2021 does not adhere, in all material

respects, to the Athens Stock Exchange ESG Reporting Guide 2022.

- The IR 2021 does not adhere, in all material respects, to the United Nations Global Compact (UNGC) Communication on Progress (CoP) requirements, against the requirements of the criteria for the "Advanced" level.
- OTE Group's sustainability strategy as disclosed in the IR 2021, is not in alignment with the United Nations' (UN) Sustainability Development Goals.
- The quantitative data disclosed in the IR 2021, for OTE, COSMOTE, GERMANOS, OTEGLOBE, OTE Academy, COSMOTE e-Value, CTS and Telekom Romania Mobile Communications for specific non-financial indicators, as described in point (9) of the Scope of Work above, are materially misstated.

Athens, 27 May 2022

The Certified Public Accountant

### Dimitris Katsibokis

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