



TOWARDS A
BETTER WORLD FOR ALL



GROUP OF COMPANIES

**INTEGRATED
REPORT**
2022

TABLE OF CONTENTS

ABOUT THIS REPORT	03	1. ENVIRONMENT	69	2.3 SOCIAL COMMITMENT	148	APPENDIX	208
Message from the Chairman and CEO	03	1.1 Environmental Strategy	70	2.3.1 Overall Social Contribution	149	2022 Performance	209
Report Profile	05	1.2 Energy and Climate Change	74	2.3.2 Digital Inclusion for All	151	Accountability Principles Standards	
		1.3 Circular Economy	84	2.3.3 Social Initiatives	161	AA1000 Index	211
OTE GROUP	07	1.4 Electromagnetic Fields	92	2.3.4 Employee Volunteering	163	United Nations Global Compact -	
Group Presentation	08	1.5 Other Environmental Aspects	93			Communication of Progress (CoP)	212
Products and Services Portfolio	11			3. GOVERNANCE	165	ATHEX Guide Index	214
Sustainable Business Model	14	2. SOCIETY	96	3.1 Corporate Governance		SASB Index	216
Key Achievements and Targets	31	2.1 EMPLOYEES	97	Structure and Members	166	Greek Sustainability Code –	
Risks & Uncertainties for the Next Year	35	2.1.1 Human Resources Management	98	3.2 Board of Directors	171	Declaration of Conformity	218
Stakeholder Management		2.1.2 Employment	103	3.3 Audit Committee	173	Global Reporting Initiative	
& Engagement	44	2.1.3 Fair Employment and Equal		3.4 Remuneration and Nomination		Content Index	220
Sustainability Indices and Ratings	48	Opportunities	104	Committee	175	Additional information for	
Awards	49	2.1.4 Health and Safety	107	3.5 Compliance, Enterprise, Risks and		GRI Indicators	230
Financial and Operational Highlights	50	2.1.5 Employee Selecting, Attracting		Corporate Governance Committee	177	Human Resources Performance Data	241
Financial Position Statements	53	and Retaining	113	3.6 Sustainability Governance	178	Environmental Performance Data	249
Income Statements	55	2.1.6 Employee Training and Skills		3.7 Enterprise Risk Management	180	Task Force on Climate Related	
Changes in Equity Statements	57	Development	116	3.8 Compliance Management	182	Financial Disclosures (TCFD) Index	255
Cash Flow Statements	59	2.1.7 Employee Communication,		3.9 Human Rights Management	190	Independent Assurance Report	257
Economic Value Distribution	60	Engagement and Satisfaction	119	3.10 Responsible Purchasing and			
Taxonomy-Related Disclosures	61			Supply Chain Management	194		
		2.2 CUSTOMERS	125	3.11 Business Security and			
		2.2.1 Connectivity for All	126	Data Privacy	197		
		2.2.2 Products and Services for		3.12 Business Continuity	203		
		Sustainability	132	3.13 Integrated Management System	207		
		2.2.3 Safe and Responsible Use					
		of Technology	139				
		2.2.4 Communication with Customers	141				
		2.2.5 Customer Service & Satisfaction	143				

MESSAGE FROM THE CHAIRMAN & CEO

In the ‘permacrisis’ era, citizens, societies, states and businesses are faced with a difficult reality of constant challenges that they are called upon to manage with clarity, composure, and adaptability, in order to not jeopardise the future of the coming generations.

In 2022 -for yet another year- there were many such challenges: inflation, the energy crisis, problems in the global supply chain, natural disasters, and devastating environmental scenarios.

We have before us a great opportunity, but also enormous responsibility. An opportunity to capitalise on technology to provide solutions for urgent issues such as climate change, uncontrolled consumption of natural resources, the energy crisis. And a responsibility to do even more than our share to ensure our children's future.

At OTE Group, we take on our share of responsibility and we capitalise on technology, with a focus on sustainable development. We are creating the network infrastructure the country needs for the next decade, digitalising the public sector and enterprises and responding to the needs of modern societies and the contemporary lifestyle.

Simultaneously, we are shaping our operations and actions based on four priorities of the sustainable development strategy: climate neutrality, circular economy throughout the value chain, inclusion and equal opportunities at the workplace, and digital society for all. In 2022, we strengthened our positive impact on economy, society, and the environment by implementing our strategy – which is harmonised with that of the Deutsche Telekom Group.

In our course to climate neutrality, we achieved an 89% reduction – with 2017 as our base year– in direct and indirect greenhouse gas emissions from the consumption of energy at our facilities. The electricity we consume comes from 100% renewable energy sources. We remain firm in our commitment to achieving zero carbon footprint from our operations by 2025, and throughout the value chain by 2040.

Implementing the principles of circular economy for conservation and more efficient use of natural resources, we achieved the goal of 100% sustainable management of our ICT waste. We also collected over 550,000 pieces of terminal equipment and 155,000 devices for upcycling or recycling.

The values of Diversity, Equality, and Inclusion characterise our work culture. At the end of the year, 32% of responsibility positions were held by women -who account for 41% of all our employees. For the 4th consecutive year, OTE was included in the Bloomberg Gender Equality Index.



**WE HAVE BEFORE US A
GREAT OPPORTUNITY,
BUT ALSO ENORMOUS
RESPONSIBILITY**

MESSAGE FROM THE CHAIRMAN & CEO

With the aim of creating a digital society for all, at OTE Group we have set the priorities for digitalising the country and creating a digital society in which everyone can participate equally. Our actions for digital inclusion in 2022, such as Grow Your Business and Educational Robotics with STEM, in combination with the social contribution of OTE Group amounting to €3.7m, reached a total of 8.2m beneficiaries.

In 2022, once again, we were the country's largest telecommunications investor, implementing over 60% of the sector's investments, mainly for the development of next generation networks. Our goal for 2023 is for 5G coverage to reach 90% and FTTH to be available at 1.4m homes and businesses.

Monitoring and recording our performance is extremely important, but it is not an end in itself. Above all, it is a compass for our future course, guiding us so that we can adapt our strategy to the real needs of society and take actions.

There is no time to waste. To create a better world for all, we have to do more than the bare minimum. We are conscious of OTE's vital role for the country and society, and we have the passion and commitment of the management and all of our people. We shall continue, with all our power, to try and make a difference, with sustainable development at the centre of our operations and actions.

Michael Tsamaz
Chairman & CEO of OTE Group

**WE SHALL CONTINUE,
WITH ALL OUR POWER,
TO TRY AND MAKE A
DIFFERENCE, WITH
SUSTAINABLE
DEVELOPMENT AT
THE CENTRE OF OUR
OPERATIONS AND
ACTIONS**

REPORT PROFILE

The 2022 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 2022 (unless otherwise stated) and is addressed to all OTE Group stakeholder groups.

This is OTE Group's fourth 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 2021.
- 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, the business strategy and the sustainability strategic priorities.
- The outcomes of the stakeholders' dialogue.
- The most significant sustainability issues that arose from the new Materiality Analysis conducted in 2022 considering the Double Materiality concept.

- The stakeholders' feedback for the 2021 Integrated Report for OTE Group companies.

The 2022 Integrated Report was approved by the Board of Directors. 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 2021

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. Supplementary information regarding the process of data collection is also included in the Non Financial Report section of the Annual Financial Report 2022.

Regarding revenue restatements, in light of the IFRS Interpretations Committee's agenda decision published in May 2022, principal vs agent assessment was revised, resulting in changes in the recognition of gross vs. net revenues. Prior-year comparatives were adjusted retrospectively. For more information regarding statements of financial data, please visit the [Annual Financial Report 2022](#). With respect to environmental information, energy and GHG emissions have been recalculated due to harmonization of parameters used at DT Group level (calorific value of natural gas).

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

REPORT PROFILE

Interpretations Committee, as adopted by the European Union.

OTE Group's complete financial activity for 2022 is presented in the [2022 Annual Financial Report](#).

Compilation in accordance with GRI guidelines

The Report has been written in accordance with the 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 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.

In this section:

Group Presentation

Product and Service Portfolio

Sustainable Business Model

Key Achievements and Targets

Risks & Uncertainties for the Next Year

Stakeholder Management & Engagement

Sustainability Indices and Ratings

Awards

Financial and Operational Highlights

Financial Position Statements

Income Statements

Changes in Equity Statements

Cash Flow Statements

Economic Value Distribution

Taxonomy-Related Disclosures

OTE Group

4%

INCREASE IN
ADJ. EBITDA (AL)

~€5bn

IN NEW TECHNOLOGIES & INFRASTRUCTURE
OVER THE PAST DECADE

>€783m

TAXES & INSURANCE CONTRIBUTION



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. It also pursued its expansion into adjacent territories with the launch of **Payzy**, an e-transaction and mobile payment platform. 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 Products and Services 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.

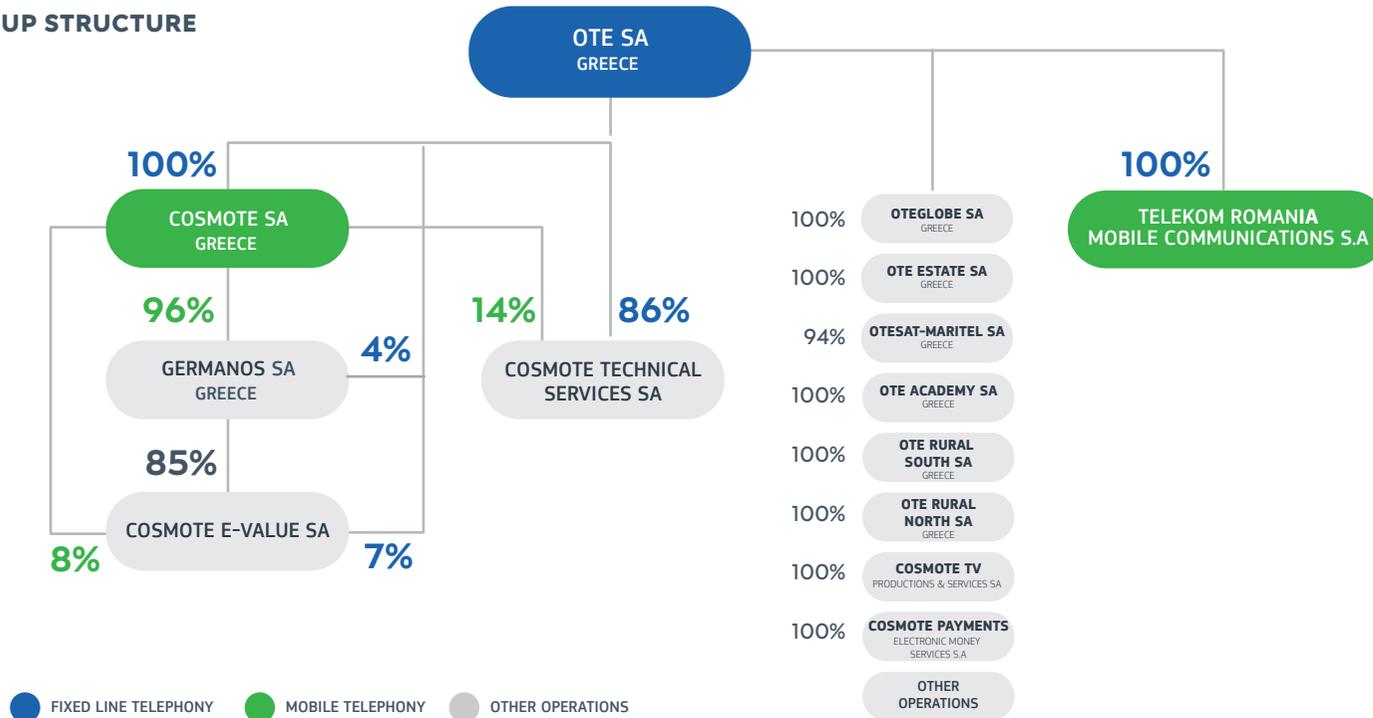
OTE was incorporated as a société anonyme in Athens, Greece in 1949 and is listed on the Athens Stock Exchange. Until September 19, 2010, OTE ADRs (American Depositary Receipts) were also listed on the New York Stock Exchange. Following OTE's delisting from NYSE, OTE ADRs now trade in the US OTC (Over 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

GROUP STRUCTURE



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 247 GERMANOS and 117 COSMOTE stores.

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 (TKRM) is a dynamic brand, offering mobile innovative communication services to a broad customer community. Its mission is to provide customers with the experience they want, taking care of them and putting their interests first. The slogan "Mobile as you want it" is the

guiding principle. TKRM simplifies customers' lives by giving them unlimited mobility to stay connected anywhere, anytime, from any device, hassle-free and worry-free. At a fair price, with no hidden clauses. Telekom is a brand of Deutsche Telekom, one of the world's leading integrated telecommunications companies.

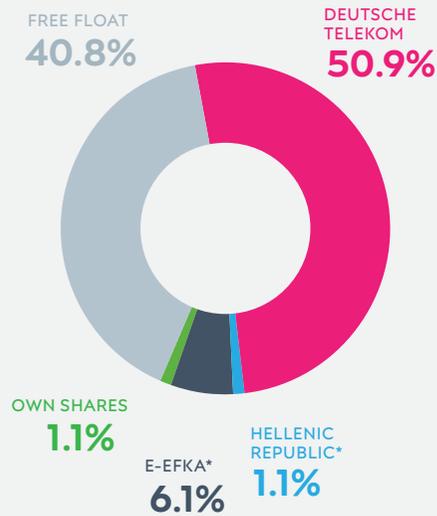
Agreement for the Spin-Off of the business sector Facility and Space Management

The Extraordinary General Meetings of Shareholders of OTE and COSMOTE of November 1, 2022, approved the Draft Demergers Agreement through Spin-Off of the business sector Facility and Space Management and its absorption by the OTE Group 100% subsidiary, OTE Estate Société Anonyme. The agreement was concluded on December 1, 2022.

Developments in respect to OTE Globe

In July 2022, the Boards of Directors of OTE and OTE GLOBE approved the initiation of the merger procedure by absorption of 100% subsidiary company OTE GLOBE by its parent company OTE SA. The companies' Boards of Directors approved the Draft Merger Agreement between OTE and OTE GLOBE in October 2022.

Already after the end of the fiscal year 2022, specifically on January 2, 2023, the merger was completed with the registration in the General Commercial Register of the decision of the competent authority that approved the merger.

**GROUP OWNERSHIP
AS OF 31/12/2022**


*The stake of e-E.F.K.A includes 19,606,015 shares transferred by Hellenic Republic in 2009



For more information regarding the Shareholders Structure of OTE please see [website](#).

OTE GROUP SUBSIDIARIES
**GROUP'S OWNERSHIP
INTEREST**

ENTITY NAME	LINE OF BUSINESS	COUNTRY	GROUP'S OWNERSHIP INTEREST	
			2022	2021
COSMOTE MOBILE TELECOMMUNICATIONS SINGLE MEMBER S.A. ("COSMOTE")	Mobile telecommunications services	Greece	100.00%	100.00%
COSMO-ONE HELLAS MARKET SITE S.A. ("COSMO-ONE")	E-commerce services	Greece	-	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 SINGLE MEMBER 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 MOBILE COMMUNICATIONS S.A. ("TELEKOM ROMANIA MOBILE")	Mobile telecommunications services	Romania	100.00%	100.00%
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 NOTIFICATION 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 & 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 & MANAGEMENT OF BROADBAND INFRASTRUCTURE S.A. ("OTE RURAL SOUTH")	Wholesale broadband and infrastructure services	Greece	100.00%	100.00%
UltrafastOTE SINGLE MEMBER SOCIETE ANONYME S.P.V. ("UltrafastOTE")	Wholesale broadband and infrastructure services	Greece	100.00%	-
COSMOTE PAYMENTS - ELECTRONIC MONEY SERVICES SINGLE MEMBER S.A. ("COSMOTE PAYMENTS")	Electronic money services	Greece	100.00%	100.00%
COSMOTE GLOBAL SOLUTIONS N.V.	ICT services	Belgium	100.00%	100.00%

PRODUCTS AND SERVICES 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 86.5% of the market, while TV for 4.6% and equipment accounts for the remaining 8.9% 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 €5 billion over the past decade. Furthermore, the Group implements an investment plan which will exceed €3 billion by 2027, to offer even higher speeds and wider coverage in fixed and mobile telephony.



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.

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							●

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/GPRS, 3G, 4G/LTE, 4G+/LTE-A

TV Services and Content

OTE Group provides television services over both xDSL (IPTV and OTT TV) and satellite. As of 31 December 2022, COSMOTE TV had 642,687 TV subscribers.

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, delivering business process and customer experience outsourcing with solutions that meet the challenges of the constant changing digital world. Its services range from sales growth and loyalty, customer care and support engagement & excellence and consulting solutions. 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 Shops and GERMANOS

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 smartwatches, 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, as well as business approach and 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

OTE Globe, 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.

OTE Globe 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.

OTE Group's vision is to be the leading sustainable digital service provider. Sustainability is a key priority, and it is integrated into the Group's business strategy and operations.

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, while always promoting fair employment practices. 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.

Customers

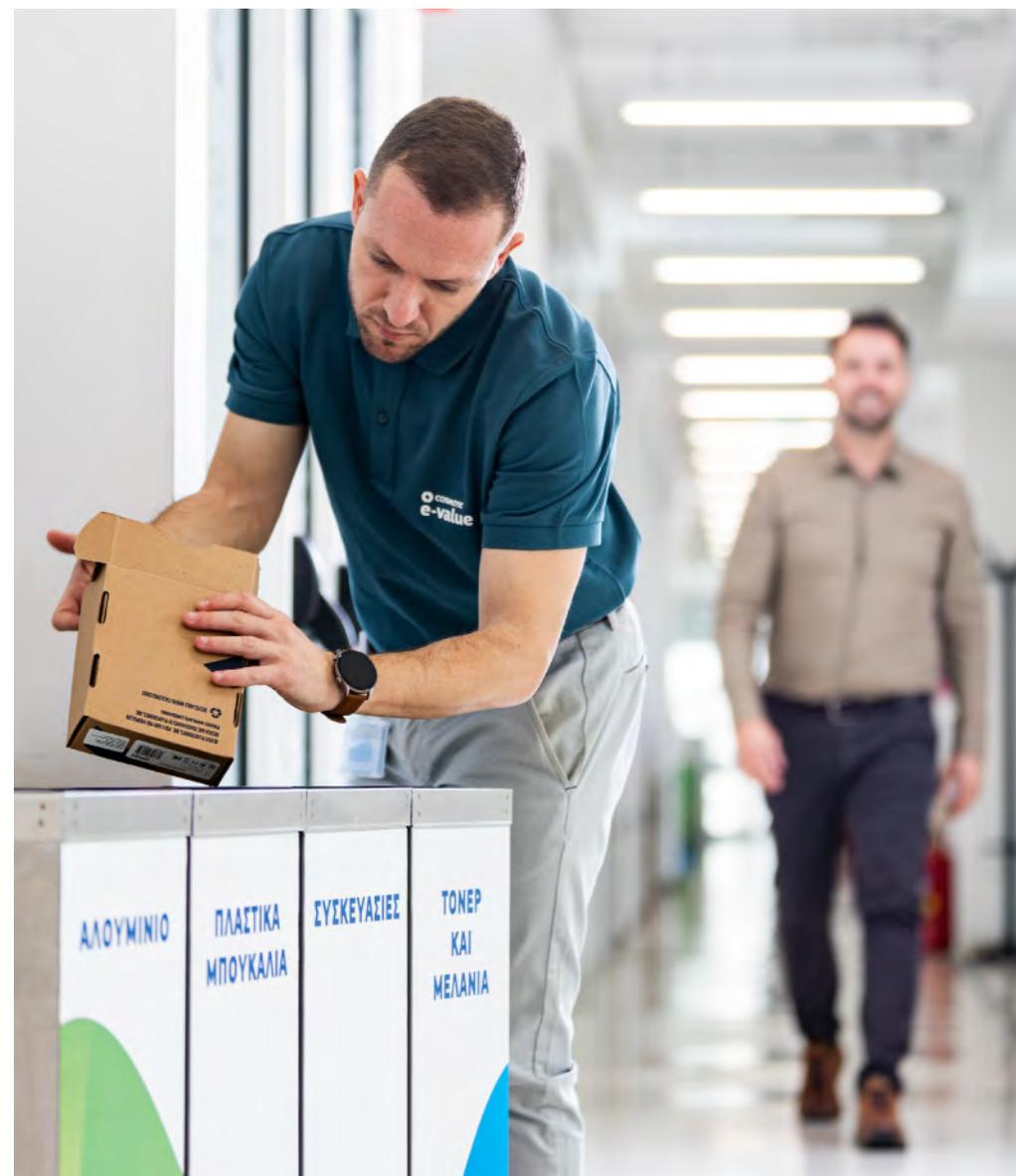
Customer experience, in every touch point with the company, their service and satisfaction are key priorities for OTE Group. The Group connects people, within a world of unlimited digital possibilities, aiming to improve everyone’s quality of life. Through the Group’s network and technological infrastructure, people can communicate and be entertained, while its digital products and services make their everyday life simpler and easier. OTE Group 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 everyone, 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 (such as energy and emissions management) 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.





SUSTAINABILITY STRATEGIC PRIORITIES

OTE Group's efforts, actions and commitments on sustainability issues focus on **four strategic priorities**, aligned with these of Deutsche Telekom Group:



CLIMATE NEUTRALITY

Reducing CO₂ emissions from own operations and across the value chain usage of Renewable Energy Sources and increasing energy efficiency.



CIRCULAR ECONOMY

Conserving natural resources and promoting circular economy principles throughout the value chain.



INCLUSION & EQUAL OPPORTUNITIES IN THE WORKPLACE

The Group's corporate culture and daily practices promote the values of Diversity, Equity & Inclusion.



DIGITAL SOCIETY FOR ALL

Decisive contribution of OTE Group to Greece's digital transformation, while ensuring equal participation in the digital world for all.





SUSTAINABILITY STRATEGIC PRIORITIES:
CLIMATE NEUTRALITY

OVERVIEW

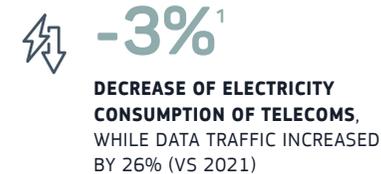
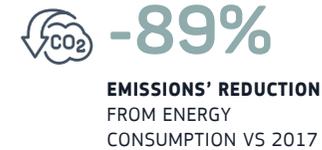
Climate is changing, global temperature is increasing, and urgent global action is needed. OTE Group is committed to minimizing the negative impact of its business activities on the climate, but also to grasp the opportunities offered by digitalisation to address the issue. In this context, the Group has in place a climate change strategy with ambitious targets to tackle climate change, across its value chain. The strategy comprises of the key pillars: emissions from the value chain; renewable energy, energy efficiency and enablement- positive climate protection effects on the customers.

KEY COMMITMENTS

OTE Group contributes to Deutsche Telekom Group's climate change targets:

- **Net Zero emissions from energy consumption (scope 1 & scope 2)** including up to 95% reduction by 2025
- **100% Renewable electricity** (2021 onwards)
- **25% reduction of emissions per customer for value chains emissions (scope 3)** (2017-2030)
- **Net Zero emissions across the value chain (scope 1, 2 & 3)** by 2040

2022 HIGHLIGHTS



¹ Data refer to OTE Group Greece
² Plug-in Electric Vehicles
³ Battery Electric Vehicles



SUSTAINABILITY STRATEGIC PRIORITIES:
CIRCULAR ECONOMY

OVERVIEW

OTE Group considers resource efficiency and conservation as a key priority. A holistic approach is applied by the Group which integrates the 6 fundamental principles of circular economy: design, production, use, repair, reuse and recycling. The approach covers the Group's own operations (telecom network, data centers, fleet, offices and shops) and its value chain as well. The initiatives and actions implemented concern issues from product design, sustainable products and packaging, to sustainable ICT and residual waste management.

KEY COMMITMENTS

- **Zero ICT¹ waste** to landfill
- **Collection of ~400,000 pcs of mobile devices² collected through take back schemes** from 2022 to 2024
- **100% sustainable packaging³** for: a) newly launched own branded devices⁴ since mid 2022 & b) 3rd party smartphones sold by the company by 2025.
- **25% paper-use reduction** (2020-2023)⁵

2022 HIGHLIGHTS



100%

OF ICT¹ WASTE
SUSTAINABLY MANAGED



>730,000

PCS OF CPES⁴ & MOBILE DEVICES²
COLLECTED AND SUSTAINABLY MANAGED
(REFURBISHED/ RECYCLED)



~4.4m

PAPER SHEETS (22t OF PAPER)⁵
REDUCED VS 2020



>1.1m

PCS OF SINGLE-USE⁶ PLASTIC AVOIDED
IN GROUP'S MAJOR BUILDINGS IN GREECE



1st

SUSTAINABLY PACKAGED OWN
BRANDED - COSMOTE CPE
LAUNCHED

1. Waste generated from telecom & retail network, buildings and datacenters
 2. Smartphones, Mobile Phones, Fixed Phones (wired and cordless), Notebooks/Laptops, Tablets, Wearables, Chargers/Powerbanks & Accessories
 3. Updated target in alignment with the relevant of DT Group
 4. Eg routers & TV decoders
 5. Commitment & data refers to OTE, COSMOTE, CTS, COSMOTE E-Value, GERMANOS
 6. Plastic bottles, cups straws, food containers & single use cutleries



SUSTAINABILITY STRATEGIC PRIORITIES:

INCLUSION & EQUAL OPPORTUNITIES IN THE WORKPLACE

OVERVIEW

OTE Group provides a sustainable, efficient, and technologically advanced working environment for its people. The Group has formed a corporate culture that embraces and promotes the values of Diversity, Equity and Inclusion, while safeguarding zero tolerance for discrimination. Its holistic approach includes fair employment, remuneration and benefits, collaborative relationship with its employees, the trade unions and employee representatives, as well as targeted and awareness- raising initiatives. To this end, policies and actions touch on all aspects of employees' daily lives, embedding DE&I in all labour practices.

KEY COMMITMENTS

- **At least 30% women** at top and senior managers' positions by 2024*
- **Further promote Diversity, Equity & Inclusion within OTE Group**, through targeted actions for all employees and leaders (Mentoring Program for Women, dedicated e-learnings for all employees)

2022 HIGHLIGHTS



*Refers to Directors ,Ex. Directors, Chief Officers of OTE, COSMOTE, GERMANOS, CTS, COSMOTE E-Value, OTE Academy companies



SUSTAINABILITY STRATEGIC PRIORITIES:

DIGITAL SOCIETY FOR ALL**OVERVIEW**

OTE Group is constantly improving its footprint in the society and sets the basis for sustainable development, with the power of technology. With a vision of a digital society for all, it invests in state-of-the-art networks and implements small and large ICT projects, making a significant contribution to the country's digital transformation. Moreover, by implementing targeted actions and providing the relevant tools, it plays a key role in the digital inclusion of all citizens. In this way, the Group provides the appropriate means, contributes to the development of digital skills, while promoting the responsible use of technology.

KEY COMMITMENTS

- **90% 5G nationwide population coverage** by 2023
- **1.4m homes and businesses with access to FTTH** infrastructure by 2023
- **3m homes and businesses** with access to FTTH infrastructure by 2027
- **~15m beneficiaries** from digital inclusion initiatives by 2024

2022 HIGHLIGHTS**910,000****HOUSEHOLDS AND BUSINESSES**
HAD ACCESS TO FTTH INFRASTRUCTURE**99%****4G NATIONWIDE**
POPULATION COVERAGE**>80%****5G NATIONWIDE**
POPULATION COVERAGE**~6.5m****BENEFICIARIES** FROM DIGITAL
INCLUSION INITIATIVES**>200,000****CHILDREN & TEACHERS DEVELOPED**
DIGITAL SKILLS THROUGH EDUCATIONAL
ROBOTICS INITIATIVES SINCE 2014**>59,000****PROFESSIONALS DEVELOPED**
NEW DIGITAL SKILLS THROUGH
THE #GROWYOURBUSINESS
INITIATIVE SINCE 2017



**OTE GROUP
ACKNOWLEDGES
AND RESPECTS
DIVERSITY AMONGST
ALL EMPLOYEES**

**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.

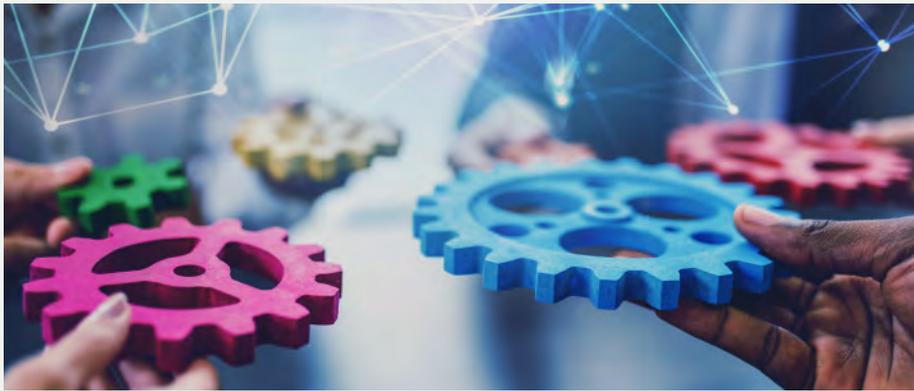
It has been developed in accordance with internationally recognized standards, guidelines, directives, norms and rules such as the International Bill of Human Rights and the Core Conventions of the International Labor Organization, the Organization for Economic Cooperation and Development (OECD) Guidelines, 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.

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 the 9 strategic priorities - scheme.

Among these 9 strategic priorities, Sustainability has been placed in the focus.

In this context, in 2021, within the two focus areas "Digital Inclusion" and "Protecting the Environment", a common framework, certain ambitions and commitments were defined, accompanied by specific key performance indicators, along with qualitative and quantitative targets for the DT EU Segment companies.

In 2022, the strategy's implementation continued, while the respective commitments and targets were monitored and enhanced, in addition to further alignment measures that were adopted during the year.

SDGs WITH SIGNIFICANT CONTRIBUTION BY OTE GROUP



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.



Digital Transformation

OTE Group aspires to be the leading Digital Services company in Greece. To achieve this goal, a holistic 360° Digital Transformation Program has been implemented and embedded in the company in the last years, addressing the key activities of 3 areas: Customer, Network and Company.



CUSTOMERS

- Each one of the customers has a Mobile app and Digital ID to access and manage all their accounts and services with OTE Group (incl. e-bill, e-sales).
- Numerous "non-core" digital services via the digital touchpoints for customers (COSMOTE Insurance, Box Food Delivery, etc.).
- A new e-payments service, Payzy by COSMOTE, has been successfully launched in 2022.
- "COSMOTE NEO": an innovative end-to-end digital telecommunications product, offering also digital customer onboarding.
- Omni-channel strategy, offering customer service journeys with unique experience through all touchpoints.
- 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 internal processes and functions.
- Creation of unified workflows without "digital gaps" to reduce paper and bureaucracy at work.
- Lean and efficient ways of work eliminating organizational complexity; introduction of Agile methodology in several areas of the organization
- Lifelong employee training - as technology evolves, the needs and scope of work change.
- Growth and innovation mindset.

NETWORK

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

INDICATIVE ACHIEVEMENTS 2022

GREECE

98%

PENETRATION OF COSMOTE MOBILE APP, WITH >3.7m users

79%
USE ELECTRONIC E-BILL

44%
USE E-TOP UP SERVICES

New experience with interactive capabilities and user-friendly interface.

ROMANIA

600k

USERS OF THE OneApp

80%

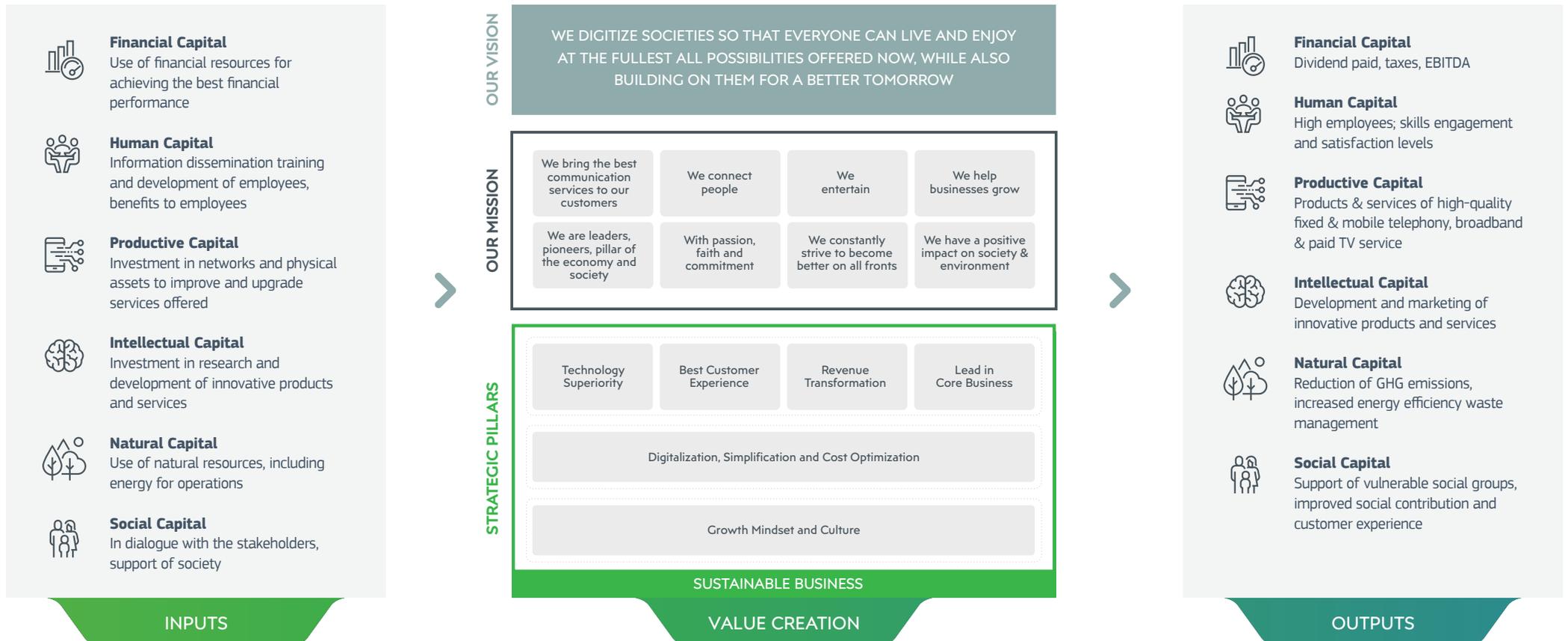
USE ELECTRONIC BILL

while 50% 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, its employees, the society and the environment. The Group continuously improves its products and services, offers new job opportunities when available, cooperates with a large number of suppliers, pays taxes to the state and contributes (financially and in kind) to the 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, through the products and services provided, customers are able to reduce their environmental impact as well. The Group's efficient operation and high competitiveness lead to positive economic results, allowing the reinvestment in the business, to create shared value for all its stakeholders in the short, medium and long term. At the same time, through its products and services, OTE Group supports its customers in reducing their environmental footprint.

GOVERNANCE



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.

OTE GROUP STRATEGIC PILLARS

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 €3 billion investment plan until 2027, a drastic increase in order to bring FTTH to 3 million 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 over 80% nation-wide coverage by the end of 2022. 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 uninterrupted service, as well as we inform them about the safe and responsible use of technology.

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 responsible and efficient use of natural resources, and the reduction of waste generated. At the same time, we launch “non-core” digital services, like e-payments, e-insurance and food ordering and delivery.

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 improving the loyalty of our customers. 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 promoting an equal, diverse and inclusive work environment and by testing and evaluating new working models (remote, agile, etc).

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.



2022 Value Highlights

In 2022, 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 2022

4,847 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.

>1,130 EMPLOYEES

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

~17,097 HOURS

of training programs on health & safety issues.

1,104 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 2022

14,629 PARTICIPATIONS

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

11.8 HOURS

of training per Group employee.

€508,750

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

5,798 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 2022

100% RES ELECTRICITY
(Guarantees of Origin and Direct Purchase).

30.6 GWH
of energy conserved.

11.3 kt CO₂ eq
of GHG emissions avoided through energy conservation measures.

21% IMPROVEMENT
of energy consumption per volume of data transferred.



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 2022

1,480 INTEGRITY CHECKS
on suppliers, consultants and partners were carried out.

4.5% PAY GAP
between men and women at the four of the largest companies of OTE Group in Greece (OTE, COSMOTE, GERMANOS and CTS).

97% OF EMPLOYEES
working at OTE Group, are covered by Collective Labor Agreements.

80% AND 78%
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 2022

910,000 FIBER-TO-THE-HOME (FTTH) LINES

have been installed throughout Greece.

80% OF GREEK POPULATION

is covered by COSMOTE 5G network.

99%/4G

population coverage in Greece.

>100 PARTICIPATIONS

in research programs since 2009.



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 2022

88% OF TOTAL WASTE GENERATED (5,633t)

was recycled or reused.

195,500 END DEVICES

were refurbished at OTE Group refurbishment plant (Greece).

1.1m SINGLE USE PLASTIC ITEMS

were refused (Greece).

25t MOBILE DEVICES

were collected and recycled.

8% 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 2022

89% DECREASE

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

30.6 GWh

energy conservation.

100% ELECTRICITY

from Renewable Energy Sources.

21% IMPROVEMENT

of data traffic energy intensity.

KEY ACHIEVEMENTS AND TARGETS

OTE REMAINS COMMITTED TO SUSTAINABLE AND PROFITABLE GROWTH

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.

- 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 2023

OTE remains committed to sustainable and profitable growth. For 2023, the Group besides achieving the annual business targets will also seek to enable its long-term evolution. Special focus will be put on the execution of its accelerated FTTH plan, the advancement of its 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.





KEY STRATEGIC PILLARS AND ACTIONS FOR 2023

TECHNOLOGY SUPERIORITY

- Accelerate FTTH Optical Fiber Networks deployment
- Expand coverage and introduce new capabilities in 5G network
- Construct optical network for UFBB project

BEST CUSTOMER EXPERIENCE

- Digital Transformation @Customer:
 - Omni-channel
 - Extended functionalities in apps
 - Service enhancements in sales and fault management processes
- Push Online Sales
- Load Reduction in front-line
- Digital predictive maintenance @Network

REVENUE TRANSFORMATION

- ICT projects
 - Public & Private sectors; EU projects
 - Cloud solutions
 - IoT - Smart Cities - Verticals
- Develop non-core digital services
COSMOTE Insurance, BOX, Payzy by COSMOTE Payments

LEAD IN CORE BUSINESS

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

DIGITALIZATION, SIMPLIFICATION AND COST OPTIMIZATION

- Lean, efficient and agile operating model; introduction of Agile methodology
- Digital Transformation @Company and @Network
- Cost efficiency programs
- Synergies with Deutsche Telekom Group

GROWTH MINDSET AND CULTURE

- Introduction and evaluation of new working models (Agile, Work from home)
- Re-skilling/ Upskilling in new digital skills of employees
- Establish a culture of growth and innovation
- Continue to drive ESG activities in order to achieve targets
- Adopting policies for improving equality, diversity, and inclusion in our workplace

SUSTAINABLE BUSINESS

2022 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 objectives 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 2021 Integrated Report, **29 annual targets were presented for OTE Group companies**. The objectives were qualitative and quantitative, covering different functions, and were subsequently implemented by the competent units. Of these objectives, 96.5% 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](#).

2023 ESG TARGETS



ENVIRONMENT

Climate neutrality

OTE Group contributes to DT Climate Change Targets:

- Net Zero for direct and indirect energy consumption including up to 95% reduction by 2025 (2017-2025).
- 100% Renewable electricity (2021 onwards).
- 25% Emission reduction per customer for value chains emissions (2017-2030).
- Net Zero emissions across the value chain by 2040.

Circular economy

Sustainable Waste Management

OTE Group: Zero ICT waste¹ to landfill (2022 onwards).

OTE Group Greece: Reach 400,000 pcs of mobile devices² from take-back programs (2022-2024).

OTE Group Greece: CPEs' take back schemes: retain sustainable management (2022 onwards).

Sustainable Packaging³

OTE Group: 100% sustainable packaging for

- Own branded newly launched own branded devices⁴ (since mid 2022).
- 3rd party smartphones sold by the company by 2025.

Paper Reduction

OTE Group Greece: 25% paper reduction (2020-2023).

Zeroplastic

OTE Group Greece: Retain single use plastic⁵ culture in major buildings.

Other Environmental

COSMOTE: Installation of 1 additional EMF measurement station.

1. Waste generated from telecom & retail network, buildings and data centers
 2. Smartphones, Simple Phones, Fixed Phones (wired and cordless), Notebooks/Laptops, Tablets, Wearables Chargers/Powerbanks & Accessories
 3. Updated target in alignment with the relevant of DT Group. Non-applicable target for Telekom Romania Mobile Communications
 4. Eg routers & TV decoders
 5. Plastic bottles, cups, straws, food containers & single use cutleries

SOCIAL

Employees

OTE, COSMOTE, GERMANOS, CTS, COSMOTE E-Value, OTE Academy:

At least 30% women at top and senior managers' positions by 2024¹.

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

OTE Group: Aim to bring the Group-wide health rate² up to 98% by 2023.

OTE, COSMOTE, CTS, GERMANOS: Aim to reduce the total number of work-related accidents (vs 2022).

OTE Group - Greece: Further promote Diversity, Equity & Inclusion within OTE Group, through targeted actions for all employees and leaders:

a) Mentoring Program for Women: The design of the Mentoring Program for women has been completed, and it is expected to be launched by the end of 2023.

b) Join Women's Empowerment Principles (WEPIs), established by UN Global Compact and UN Women.

OTE-COSMOTE: Complete the Agile Transformation, by the end of 2024 (in scope Commercial functions):

a) Design the agile organization, define the respective Roles & Interconnections.

b) Create an agile working culture and adapt the people model to the agile operating model.

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 Group Greece: Enhance training programs for improvement of STEM skills for children within 2023. For 2023, the Museum targets at approximately 1,200 beneficiaries (Elementary and Junior high school students and children between 6 to 12 years old) for its STEM training programs.

GOVERNANCE



Enterprise Risk & Compliance

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 in 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: Increase awareness of employees and business partners on compliance issues (e-learnings on Basic Knowledge Compliance/ Anticorruption/ Handling Conflicts of Interest, Top Management Compliance Training, awareness to business partners on OTE Group Principles, the OTE Group Compliance Management System and the related Codes) by 2024.

OTE Group: An affiliated company to apply for the "World's Most Ethical Companies" award and OTE to apply for an ICA award within 2023.

OTE Group: Confirmation, by an independent certification body, that OTE, COSMOTE, GERMANOS, eValue and CTS implement the corporate governance guidelines according to ISO 37000:2021 "Governance of Organizations" by 2023.

OTE Group: Update the requirements of Third Party management Policies & processes in OTE Group, by 2024.

OTE Group: Update, within 2023, the related OTE Group Policies & processes according to the guidelines of ISO 37002:2021 "Whistleblowing Management Systems".

OTE Group: Implementation, by 2023, of an electronic register of all the artificial intelligence systems that each company uses either in the context of consumer profiling or in the context of the evaluation of all types of employees or natural persons cooperating with it (requirement of Law 4961/2022).

OTE Group: Enhancement, by 2024, of Human Rights Due Diligence Program regarding the supply chain.

1.Refers to Directors ,Ex. Directors, Chief Officers of companies
2.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

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 2022, OTE Group conducted a materiality analysis taking into account the double materiality perspective and in accordance with the Group's unified Enterprise Risk Management methodology, according to best practices. Key issues

were identified with the participation of the OTE Group's Senior Management and the company's stakeholders, considering relevant risks and opportunities, as well as positive and negative impacts related to the material issues. The materiality analysis constitutes an important component of the stakeholder dialogue and the process of

understanding stakeholders' expectations. The materiality analysis results are used in the Group's planning actions and operations strategic planning. Furthermore, the material issues are included in the company's risk map.

More information in the section [Materiality Analysis](#).

The Board of Directors and the Management of 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, 2022.

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 [2022 Annual Financial Report](#).

Pandemic Crisis; COVID-19

In the first half of 2022, the COVID-19 pandemic fluctuated, showing an aggravation in the beginning of the year and a reduction in May and June 2022, while, the ever-increasing vaccination coverage among the population was a protection shield. During the first four months of 2022, an increase in the number of coronavirus cases was observed due to

the wide spread of mutations of the Omicron strain of SARS-CoV-2, which began during the previous Christmas period. Therefore, the implementation of restrictive measures in Greece continued, for the protection of the population against the pandemic. The second half of 2022 was characterized by the gradual lifting of restrictive measures, returning to normality. Towards the end of the year, COVID-19 status seems to be passing into the endemic phase, via combination of vaccination, antiviral drugs, widespread circulation of tests and immunity (due to previous illness). In full compliance with the orders of the State, OTE Group of Companies continued to implement and develop its targeted action plan, aiming at ensuring the health of its employees and the uninterrupted continuity of its operation. The official measures were gradually lifted from mid-May 2022, with the reduction of the percentage of employees who work remotely. Since then, teleworking is no longer considered as a measure against the pandemic. OTE Group, however, throughout the semester maintained a higher percentage of teleworking than required. Today the percentage of teleworking in the Group amounts to 20%. Frontline units (stores and field technicians)

were still working at full capacity, and Logistics/Warehouse employees work on shifts. Regarding the confirmed cases of COVID-19, the company implemented an updated protocol, based on legislation, for the quarantine and isolation of employees and followed specific recommendations in accordance with the National Public Health Organization (NPHO). Throughout the pandemic, the Company continually acts based on the instructions and decisions of all relevant bodies, respecting the requirements and the action plan adopted by the Greek authorities.

Hence, the Company continued to use all the digital channels and took all the necessary precautionary measures, concerning remote work scheme, operational modification of stores in high exposure regions, provision of healthcare supplies, provision of specialized Personal Protective Equipment (PPEs) for technicians and activation of direct communication which could be used by all the employees for consultation on health issues and psychological support (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 were not verified.

Macroeconomic conditions in Greece

Currently prevailing economic risks arising globally, as a result of sharply rising interest rates, energy market turbulence driving upwards prices for raw materials, as well as severe geopolitical tensions have negatively affected macroeconomic conditions globally, including Greece.

Management continually assesses the possible impact of any changes in the macroeconomic and financial environment in Greece taking into consideration global economic developments, so as to ensure that all necessary measures are taken in order to minimize any impact on the Group's Greek operations. Rising inflation and increased energy prices have affected Group's financial and operational performance. Management is closely monitoring macroeconomic developments and financial outlook in order to mitigate uncertainties and risks.

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, 2022.

Risk from the Russian invasion of Ukraine

The Group has no operational exposure in Ukraine and Russia. However, the geopolitical uncertainty has resulted in higher inflation and increased volatility in the energy market affecting the general economic environment, which is likely to continue. Furthermore, there is an increased risk from the disruption in the global supply chain.

Financial Risks

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

a) 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 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.



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.

b) 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 as at December 31, 2022 amount to €590.1m and €163.7m respectively and their short-term borrowings and their short-term portion of long-term borrowings amount to €173.1m and €96.5m, respectively.

The full list of financial risks together with their mitigation practices are outlined in the **2022 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 Department OTE Group, in cooperation with Network Automation, Security and Operations Support Department Fixed & Mobile and IT Architecture Department OTE Group test and rehearse the recoverability and 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, Fiber to the Home and digital wallets.

The increasing degree of digitalization and interconnectedness in our society, along with the rising number of cyber-attacks at global level, introduced new, more complex challenges to companies and paved the way for a significant change in mindset regarding institutional and regulatory approach to cybersecurity. OTE Group provides a wide range of products and services, including integrated ICT solutions, to well-established customers and public organizations, keeping cybersecurity at the forefront. The Company embraces a holistic approach to cybersecurity, balancing the need to protect itself from cyber risks and ensure that right levels of protection are in place with the need for business innovation.

To maintain a high level of security throughout its network and information systems, OTE Group Information Security

and Telecommunication Fraud Prevention Division delivers a resilient security strategy, demonstrating its commitment and the key actions it takes to stay ahead of the cyber threat landscape. By taking a risk-based approach to cybersecurity, the Division establishes and implements the required set of security policies, procedures and practices, oversees their implementation, builds robust security mechanisms, secure and reliable systems and infrastructure, and evaluates their operating effectiveness (e.g. via periodic system audits). In addition, the 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.

Ensuring security of network and information 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 **Business 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 [Business 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 impact.

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 and to become climate neutral by 2050 (European Green Deal). Both targets are legally binding with the adoption of the EU Climate Law.

The European Commission released (2021) a series of legislative proposals (Fit for 55) setting out how it intends to achieve its climate targets. Moreover, the EU Taxonomy Regulation and its delegated acts define 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, Greece has put into force the Greek Climate Law (May 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.

Tackling climate change is an essential element of OTE Group’s environmental strategy and one of OTE Group’s strategic priorities for sustainable development. With a view to achieve climate neutrality, OTE Group plans and implements actions to reduce greenhouse gas emissions throughout its value chain, uses Renewable Energy Sources and increases energy efficiency.

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

OTE GROUP | RISKS AND UNCERTAINTIES FOR THE NEXT YEAR

- 100% use of Renewable Energy Sources for electricity consumption from 2021 onwards.
- Net-zero GHG emissions from energy consumption (scope 1 and scope 2 emissions) by 2025 (up to 95% reduction of emissions from energy consumption by 2025 compared with 2017 and neutralization of the residual emissions).
- 25% reduction of indirect emissions (scope 3) per customer by 2030 compared with 2017 (base year).
- Net-zero carbon footprint (scope 1, 2 and 3) by 2040 at the latest.

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.

In addition, low environmental performance could affect the Group’s reputation and market share, as surveys indicate that climate change is a matter of concern for stakeholders, while investors seek to engage with companies that have an effective environmental policy in place.

On the long term, telecommunications infrastructure could be affected by extreme weather events (physical impacts) and there could be impacts on network operation and the availability of the telecommunication services provided.

At the same time, the enabling role of Information and Communication Technology (ICT) in tackling climate change generates opportunities for the further development of OTE Group.

Taking into consideration all the above, OTE Group:

- Prepares GHG emissions inventories on an annual basis covering all its activities across the value chain (scope #1, #2 and #3).
- Reduces greenhouse gas emissions to the extent technically and economically feasible. The emissions that cannot be reduced will be neutralized by means of high-quality compensation and carbon

capture projects in accordance with the established framework.

- Implements energy conservation measures across its activities (telecom network, data centers, buildings) with emphasis on the fixed and mobile telecom network.
- Makes use of Renewable Energy Sources to cover by 100% its electricity consumption.
- Invests in the electrification of vehicles’ fleet, considering the maturity of the market and the technology, as well as the availability of vehicle charging infrastructure.
- Addresses the electricity consumption of broadband equipment by participating, voluntarily, in the "Code of Conduct for Broadband Equipment".
- Implements a certified Business Continuity Management System to prevent and promptly deal with situations that may affect the operation of the telecommunications network and the uninterrupted provision of telecommunications services.

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](#) 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, 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

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; refrigerants; 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.

The evaluation of work - related risks and hazards and their consequences, conducted by Health & Safety Business Unit, has



revealed that the category of employees who is exposed to the most significant hazards is the technical staff. These hazards could be the following:

- Improper use of Personal Protective Equipments ("PPE") Correct use 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 of PPEs properly.
- Work on poles, can also lead to accidents, especially if the worker uses his PPEs improperly or not at all.
- Use of ladders, which have been located wrongly, for repair or maintenance purposes.
- 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.
- Domestic Animal attacks (such as dogs).

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



Compliance, Corruption, Bribery and Human Rights

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, 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, in which a communication channel for the violations of human rights is included.

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, the Policy on

Insider Trading, the Prevention and Combatting Violence and Harassment in the Workplace Policy and the Digital Ethics Guidelines on Artificial Intelligence.

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

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.

STAKEHOLDER MANAGEMENT & ENGAGEMENT

Stakeholder engagement is of strategic importance to OTE Group since it enables the Group to regularly grasp societal changes in order to mitigate relevant emerging risks as well as being proactive in identifying opportunities arising from them.

OTE Group recognizes that its stakeholders have a direct impact and influence on its sustainable development, its operation and 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 stakeholders 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. The stakeholders of the Group are identified by taking into consideration the stakeholders of DT, while also consulting the Top Management and the Group's Divisions. The final stakeholder groups are approved by the CEO of OTE.

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

- Shareholders, Bondholders, Investors and Analysts.
- Customers and prospective customers.
- Business.
- Organizations of 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. The communication channels and frequency of communication with stakeholders are adapted according to the group of stakeholders and their needs, in order to ensure effective communication and response from OTE Group.

In this context, 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 2022, the Group participated in a number of sustainability-related working groups, taskforces, fora and events, some of them presented below:

- Greece Country Council of the **Sustainable Markets Initiative** (SMI).
- 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.
- **Corporate Governance Committee**, of the American Hellenic Chamber of Commerce.
- 12th Annual Capital Link Sustainability Forum - "Can Sustainability Prevail Over Geopolitics?".
- Outreach event on the EFRAG draft of European Sustainability Reporting Standards (ESRS), organized by CSR Hellas & EFRAG: participation in panel.
- "Sustainable business models: Best practices for corporate reporting of non-financial information", organized by CSR Hellas: key speech.
- Corporate Sustainability & Responsibility School 2022, organized by CSR HELLAS: key speech on OTE Group's materiality analysis.
- Global Sustain Brunch, organized by Global

Sustain: key speech on "Sustainability Basics & Essentials".

- ESG Universe Forum 2022 organized by Smart Press: key speech on Circular Economy best practices.
- "4th Diversity in Business Conference", organized by Boussias Communications, Diversity Charter Greece: participation in panel on "Diversity & inclusion as a strategic choice".
- "Diversity, Equity & Inclusion Leadership Conference", organized by KPMG.
- 5th Compliance Conference "Seeking certainties in uncertain times", organized by Association of Compliance Officers in Greece (ASCO/SEKASE), which also included the topic "Shaping the Ethical Corporate Culture".
- Online workshops entitled "The Internal Control System: a key to corporate governance", organized by SEV (in cooperation with SEKASE, H.A.RI.MA and IIA Greece).
- Business Integrity Forum of Transparency International Greece: participation in a) the 11th Round Table (Webcast) entitled "Contemporary Challenges of Corporate Interest", b) the seminar on "The protection of whistleblowers in the corporate environment" and c) the 12th Round Table entitled "Strengthening the efforts against corruption".
- ACFE Greece Annual Conference "Managing the Business Risk of Fraud: There is a way".

- 2nd Annual Conference 2022 "Operating in a Risk Environment", organized by H.A.R.I.M.A and Cleon Conferences & Communications.

The stakeholders' feedback is considered by the relevant operational bodies, including the Board of Directors, for the formulation of strategy, commitments and actions, and it is also utilized as an input in the Group's materiality analysis process. In this framework, the outcomes of the stakeholder dialogue contribute to the implementation of strategic actions and to the validation and improvement of the sustainability strategy of the OTE Group, which is approved by the OTE's Board of Directors, as defined in the OTE Group Sustainability Policy.

In 2022, OTE Group stakeholders were invited to participate in OTE Group's Materiality Analysis process, where they were asked to assess a list of sustainability issues regarding the impact of the Group on the economy, the society and the environment.

See **Materiality Analysis** section for more information.

More information related to stakeholders is presented in the **Appendix**.

MEMBERSHIPS

OTE Group companies actively participate in associations and are informed about the trends and developments on Corporate Responsibility and Sustainability issues. In 2022, OTE Group companies maintained their voluntary participation, through their membership in a number of strategically important national and international bodies.



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

METHODS OF STAKEHOLDER ENGAGEMENT WITH PRIMARY STAKEHOLDER GROUPS



AA1000 ACCOUNTABILITY PRINCIPLES STANDARD

OTE Group companies comply with the principles of the "AA1000 AccountAbility Principles" Standard, namely Inclusivity, Materiality, Responsiveness and Impact.

OTE GROUP | STAKEHOLDER MANAGEMENT & ENGAGEMENT

1. Energy, Emissions and Climate Change
2. Circular Economy
3. Biodiversity
4. Water Management
5. Electromagnetic Field (EMF) Safety and Management
6. Fair Employment and Employee Management
7. Employee Training and Skills Development
8. Employee Health, Safety and Wellness
9. Community Engagement and Impact
10. Sustainable Products and Services for a Digital Society
11. Safe and Responsible Products and Services
12. Customer Communication and Satisfaction
13. Economic Performance and Impact
14. Governance and Management
15. Risk Management and Business Continuity
16. Ethical Business Practices
17. Human Rights Management
18. Data Security and Privacy
19. Responsible Procurement and Supply Chain



rated above the "significant" threshold, while the "Employee training and skills development" issue was de-prioritized. The first issue is an integral part of the Group's responsible business approach, while the latter remains a crucial aspect of the Human Resources' management and it is treated accordingly.

The issues in the matrix above, have been selected after a diligent consideration of various sources such as the Compliance Risk Assessment, previous materiality analysis results, sector issues, applicable ESG/sustainability standards etc. In the preliminary due diligence process the Group identified indicative risks and opportunities, potential and actual impacts on the

environment, economy, people and society connected with its own activities (operations, products, services) and business relationships across its operations and value chain, to the applicable extent.

The process of materiality assessment by the Group's Senior Management included the consideration of risks and opportunities as well as positive and negative impacts.

The 2022 Integrated Report refers to all 19 issues, with special focus on the 9 issues identified as the most material (i.e. significant and most significant issues in the matrix).

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

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, meets the requirements and is included in the FTSE4Good Index Series, which evaluates and monitors in detail listed companies in terms of their performance on Environmental, Social and Governance issues.

ISS ESG



Since 2018, OTE has been awarded with the "Prime" status. This title is awarded to companies if the overall ESG Corporate Rating letter grade meets or exceeds the industry-specific Prime threshold defined by ISS ESG's Industry Classification Matrix, which reflects the overall magnitude of an industry's risk exposure and footprint.

MSCI ESG RATINGS



OTE has been upgraded to 'A' from 'BBB' in MSCI ESG Ratings assessment as of November 2022, according to its ESG performance. MSCI ESG Research provides in-depth research, ratings and analysis of the environmental, social and governance-related business practices of thousands of companies worldwide.

CDP



Since 2010, OTE has been participating in the CDP on Climate Change by communicating the required information to its platform. In the 2022 evaluation, OTE scored a "B" (Management) rating.

BLOOMBERG GEI



As of January 2023, OTE has been included, for the fourth consecutive year, in the Bloomberg LP Gender-Equality Index (GEI). Bloomberg GEI tracks the performance of public companies committed to disclosing their efforts to support gender equality through policy development, representation, and transparency.

ATHEX ESG



OTE is included in the ATHEX ESG Index, since July 2021. Initially, in 2021, 35 companies were included in the Index, which monitors the stock market performance of Athens Stock Exchange listed companies that adopt and promote ESG practices.

AWARDS

In 2022, OTE Group companies received several awards and distinctions for their sustainability/ ESG performance and actions, some of which are:

GREECE



HELLENIC RESPONSIBLE BUSINESS AWARDS 2022

ORGANIZED BY BOUSSIAS COMMUNICATIONS

OTE Group received **Bronze** award for its initiative "A better world for all, without discrimination!" in the Diversity, Inclusion, Equal Opportunities category.

BRAVO SUSTAINABILITY AWARDS 2022

ORGANIZED BY QUALITYNET FOUNDATION

OTE Group received:

- **Award** in the "Market" category for the "#GrowYourBusiness - The Digital Sessions" aiming at the digitalization of SMEs.
- **Award** in the "Society" category for the "you.grow" internal talent development program for young employees.

IMPACT BUSINESS IT EXCELLENCE (BITE) AWARDS 2022

ORGANIZED BY BOUSSIAS COMMUNICATIONS

Among the **9 awards** that OTE and COSMOTE received - including the "Network & Communications" **Gold** award that OTE Group received - the "#GrowYourBusiness-The Digital Sessions", earned the **Gold** Award in the "Employment, Education, Inclusion & Diversity" category.

SUSTAINABILITY PERFORMANCE DIRECTORY

OF QUALITYNET FOUNDATION

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

CHANGE THE WORLD LIST 2022

BY FORTUNE GREECE

OTE Group is included for the "Waste Management Programs".

HR AWARDS 2022

Platinum awards in "Learning & Development" and "Health & Well-Being"

ROMANIA



CST INDEX 2022

Telekom Romania Mobile was awarded in the "Gold" category, for its 2021 sustainability reporting.

COMMUNITY INDEX 2022

Telekom Romania Mobile received the Silver Prize in the "Education for Career" category, for the "Futureproof" project.

Overall, OTE Group has received several awards in 2022 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 2022 is 10,714.

OTE Group's consolidated revenues totaled €3,455.3m in 2022, up 3.6% compared to prior year, on positive momentum in Greece.

In Greece, total revenues posted a solid increase of 3.6% to €3,155.4m, benefiting from the positive performances in Mobile, ICT, TV and Broadband. Total service revenues were up 1.2%, supported by

ongoing investments in network infrastructure and customer experience, while ICT segment recorded a solid growth of 26.4%.

In Romania mobile, total revenues reached €306.4m in 2022, down 2.9% compared to prior year, largely affected by significant drops in mobile termination rates (MTR).

Total Group Operating Expenses, excluding depreciation, amortization, impairment and charges related to voluntary leave schemes and other restructuring costs amounted to €2,035.1m in 2022, up 3.6% compared to 2021, mainly reflecting higher topline activity and the rise in energy costs caused by the current crisis.

The Group's Adjusted EBITDA After Lease (AL) amounted to €1,348.0m up 4.0%, yielding a margin of 39.0% compared to 38.8% in 2021, on positive performances in both Greece and Romania. In Greece, Adjusted EBITDA After Lease (AL) increased by 3.5% to €1,310.0m, resulting in a margin of 41.5%, mainly due to higher top-line performance. Romania Mobile achieved a significant increase in Adjusted EBITDA After Lease (AL), up 24.6% to €38.0m compared to €30.5m in 2021, mainly reflecting cost-containment initiatives implemented throughout the year.

Group expenses for depreciation, amortization and impairment stood at €795.1m, compared to €667.6m in 2021. During 2022, an impairment test was performed for TELEKOM ROMANIA MOBILE with respect to its carrying value. As a result of the impairment test, an impairment loss of €115.9m was charged in the 2022 consolidated income statement and is included in "Depreciation, amortization and impairment" line (details in Note 9 of the Annual Financial Statements).

The Group reported **Operating profit** before financial and investing activities of €590.5m, compared to €812.3m in 2021. The decrease of 27.3% reflects the aforementioned impairment in Romania as well as a €133.5m reversal of a provision in 2021, related to OTE's pension fund for voluntary leave schemes of past years.

Interest and related expenses stood at €39.9m, down 11.3%, mainly reflecting the favorable evolution in average cost of debt.

The Group's income tax expense stood at €166.2m in 2022, decreased compared to 2021, following lower profit before tax. In the respective period of 2021, the Group had also recorded the negative impact on the deferred tax asset base resulting from the corporate income tax rate reduction from 24% to 22%.



Adjusted Profit from continuing operations (attributable to owners of the parent) stood at €540.7m in 2022 an increase of 9.8%, compared to €492.4m in the same period of 2021.

In 2022, Adjusted Free Cash Flow After Lease (AL) stood at €654.2m up 10.9% compared to 2021, while reported Free Cash Flow stood at €597.1m up 23.8%, mainly reflecting lower income tax paid, higher profitability, working capital improvements, and lower payments for voluntary exit schemes.

The Group's Net Debt stood at €726.7m at December 31, 2022, down 7.0% compared

to December 31, 2021. The Group's ratio of Net Debt to Adjusted EBITDA (AL) stood at 0.5x. Repayment during 2022 of a maturing €374.6m, 2.375% bond, together with refinancing at lower rates, led to a decrease in OTE's weighted average interest rate compared to 2021. As OTE's next significant bond maturity is due in September 2026, the Group has little medium-term exposure to the global rise in interest rates.

Shareholder Remuneration Policy

On February 22, 2023, the Board of Directors of OTE revised its Shareholders Remuneration Policy, 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. Starting from 2023, the cash dividend will account for at least 50% of total shareholder remuneration and the remaining part will be allocated to share buybacks."

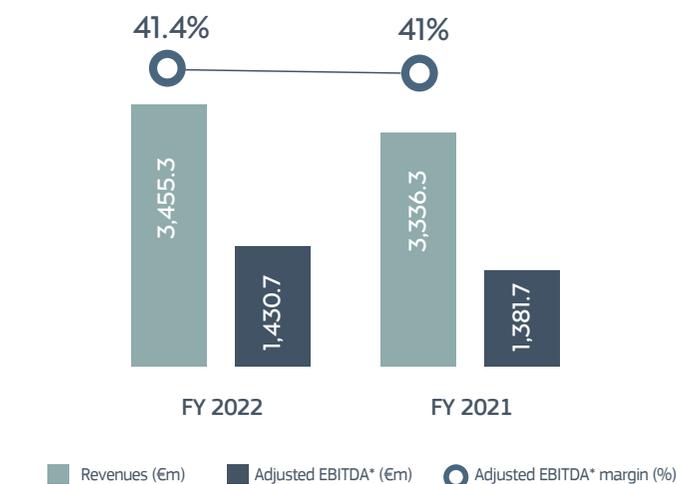
"The Board will examine the use of any cash flow reserves which may be accumulated in the medium term, together with past surpluses.

"The implementation of the revised Shareholder Remuneration Policy will start in 2023 and will take into account the net free cash flow projections for the current year, i.e. 2023, 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 shareholder remuneration in 2024 will take into account the

OTE GROUP | FINANCIAL AND OPERATIONAL HIGHLIGHTS

	OTE	COSMOTE	Other activities in Greece	Telekom Romania Mobile Comm.
Revenue	€1,613.3m	€1,246.3m	€1,201.5m	€306.4m
EBITDA	€741.2m	€531.8m	€110.1m	€59.2m
CAPEX investments (incl. Spectrum charges)	€414.8m	€132.7m	€52.0m	€40.0m
Subscribers	2,701,453 fixed telephony	7,370,105 mobile telephony		4,165,629 mobile telephony
	2,318,241 broadband connections, of which 945,088, fiber service ¹			
	642,687 COSMOTE TV subscribers			
Adj EBITDA AL	€715.7m	€486.6m	€108.6m	€38.0 m

OTE GROUP FINANCIAL PERFORMANCE IN €M



*Excluding the impact of costs related to voluntary leave schemes and other restructuring costs

projections of net free cash flow for 2024 and so on.”

Based on the current projection for 2023, the net free cash flow is estimated to reach approximately the amount of €500m. The total Shareholder Remuneration amount (dividends and share buybacks) will reach approximately €425m.

For the part of the Shareholder remuneration corresponding to dividend distribution, it is proposed that a dividend of

€0.5765 per share or a total amount of €250m be distributed. It is noted that the amount of €0.5765 per share (a) exceeds the minimum dividend payable as required by article 161 of Law 4548/2018 and (b) corresponds to 433,664,596 shares into which the share capital of the Company is divided.

It is noted that own shares owned by the Company at the ex-dividend date are not entitled to dividend. Therefore, the dividend

that will be approved by General Shareholders Meeting that will take place in 2023 corresponding to such own shares, will increase the dividend payable to the other shareholders according to the law.

It is further noted that, the remaining amount, i.e. approximately €175m (amount to vary within a 2% range depending on market conditions and execution) or c.41% of the total amount to be allocated under the Shareholders Remuneration for 2023,

will be allocated for the buyback of Company’s shares under the existing Share Buyback Program.

This proposed distribution is subject to the provisions of law 4548/2018 and the current tax legislation.

OTE Group’s complete financial activity for 2022 is presented in its **2022 Annual Financial Report**.

FINANCIAL POSITION STATEMENTS

STATEMENTS OF FINANCIAL POSITION (CONSOLIDATED AND SEPARATE)

The accompanying notes of the Annual Financial Report 2022 on pages 115-181 form an integral part of these financial statements presented in the tables below.

(Amounts in millions of Euro)	NOTES	GROUP		COMPANY	
		2022	2021	2022	2021
ASSETS					
Non-current assets					
Property, plant and equipment	4	2,081.1	2,080.3	1,323.5	1,250.2
Right-of-use assets	5	266.6	264.7	132.6	150.2
Goodwill	6	376.6	376.6	-	-
Telecommunication licenses	7	296.1	348.9	2.4	1.7
Other intangible assets	8	335.1	387.7	242.9	275.5
Investments	9	0.1	0.1	3,105.1	3,158.8
Loans to pension funds	20	64.7	68.6	64.7	68.6
Deferred tax assets	23	178.2	197.9	4.7	22.7
Contract costs	22	30.2	24.3	10.8	9.8
Other non-current assets	10	75.3	75.9	45.5	45.8
Total non-current assets		3,704.0	3,825.0	4,932.2	4,983.3
Current assets					
Inventories	11	54.0	38.0	11.6	5.0
Trade receivables	12	471.2	504.4	296.3	304.1
Other financial assets	13	4.8	5.6	2.8	3.0
Contract assets	22	49.6	34.6	6.1	3.4
Other current assets	14	123.7	176.9	75.8	164.8
Restricted cash		1.8	1.8	-	-
Cash and cash equivalents	15	590.1	630.7	163.7	274.0
Total current assets		1,295.2	1,392.0	556.3	754.3
TOTAL ASSETS		4,999.2	5,217.0	5,488.5	5,737.6
EQUITY AND LIABILITIES					
Equity attributable to owners of the Parent					
Share capital	16	1,227.3	1,292.6	1,227.3	1,292.6
Share premium	16	438.9	462.6	438.9	462.6
Treasury shares	16	(73.5)	(157.1)	(73.5)	(157.1)
Statutory reserve	17	440.7	440.7	440.7	440.7
Foreign exchange and other reserves	17	(138.8)	(168.6)	(20.5)	(32.8)
Changes in non-controlling interests		(3,314.1)	(3,314.1)	-	-
Retained earnings	17	3,267.9	3,414.4	1,215.4	1,192.6
Total equity attributable to owners of the Parent		1,848.4	1,970.5	3,228.3	3,198.6

OTE GROUP | FINANCIAL POSITION STATEMENTS

(Amounts in millions of Euro)	NOTES	GROUP		COMPANY	
		2022	2021	2022	2021
Non-controlling interests	9	0.5	1.7	-	-
Total equity		1,848.9	1,972.2	3,228.3	3,198.6
Non-current liabilities					
Long-term borrowings	19	881.5	753.7	846.9	797.6
Provision for staff retirement indemnities	20	96.7	139.9	33.4	50.8
Provision for youth account	20	86.1	98.4	86.1	98.4
Contract liabilities	22	40.8	33.2	48.9	48.2
Lease liabilities	5	182.1	189.2	103.7	126.5
Deferred tax liabilities	23	0.4	3.3	-	-
Other non-current liabilities	21	55.7	89.3	73.7	115.8
Total non-current liabilities		1,343.3	1,307.0	1,192.7	1,237.3
Current liabilities					
Trade accounts payable		874.0	818.5	489.5	468.2
Short-term borrowings	19	150.0	-	40.0	-
Short-term portion of long-term borrowings	19	23.1	397.3	56.5	374.2
Income tax payable	23	92.3	44.0	39.4	7.9
Contract liabilities	22	136.1	132.5	83.0	85.4
Lease liabilities	5	76.1	71.7	34.2	25.3
Dividends payable	18	2.4	2.3	2.4	2.3
Other current liabilities	24	453.0	471.5	322.5	338.4
Total current liabilities		1,807.0	1,937.8	1,067.5	1,301.7
TOTAL EQUITY AND LIABILITIES		4,999.2	5,217.0	5,488.5	5,737.6

INCOME STATEMENTS

INCOME STATEMENTS (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro except per share data)	NOTES	GROUP		COMPANY	
		2022	2021 ¹	2022	2021 ¹
Revenue					
Fixed business:					
Retail services revenues		933.4	950.8	930.0	948.2
Wholesale services revenues		590.2	585.3	345.1	339.6
Other revenues		342.6	270.0	282.9	241.6
Total revenues from fixed business		1,866.2	1,806.1	1,558.0	1,529.4
Mobile business:					
Service revenues		1,189.0	1,164.1	-	-
Handset revenues		283.8	270.1	2.1	1.7
Other revenues		29.6	24.3	-	-
Total revenues from mobile business		1,502.4	1,458.5	2.1	1.7
Miscellaneous other revenues		86.7	71.7	53.2	46.8
Total revenues		3,455.3	3,336.3	1,613.3	1,577.9
Other operating income	25	10.5	9.2	32.1	28.9
Operating expenses					
Interconnection and roaming costs		(442.7)	(441.4)	(87.5)	(85.1)
Provision for expected credit losses	12	(48.0)	(67.6)	(25.2)	(26.0)
Personnel costs		(442.3)	(430.6)	(90.4)	(91.2)
Costs related to voluntary leave schemes	20	(39.4)	121.8	(10.7)	129.9
Commission costs		(82.6)	(85.0)	(56.8)	(47.4)
Merchandise costs		(358.7)	(311.3)	(55.0)	(44.2)
Maintenance and repairs		(77.5)	(74.1)	(38.7)	(38.8)
Marketing		(69.9)	(66.0)	(22.1)	(18.9)
Other operating expenses, out of which:		(519.1)	(511.4)	(517.8)	(536.3)
<i>Facility and other lease related costs</i>		(122.1)	(107.7)	(71.1)	(62.6)
<i>Third party fees and services</i>		(219.1)	(172.4)	(360.6)	(338.9)
<i>Other taxes and regulatory charges</i>		(68.3)	(73.6)	(26.0)	(33.6)
<i>Construction cost network</i>		(0.4)	(0.2)	-	-
<i>Other sundry operating expenses</i>		(109.2)	(157.5)	(60.1)	(101.2)
Total operating expenses before depreciation, amortization and impairment		(2,080.2)	(1,865.6)	(904.2)	(758.0)
Operating profit before financial & investing activities, depreciation, amortization & impairment		1,385.6	1,479.9	741.2	848.8
Depreciation, amortization and impairment	4,5,7,8,9	(795.1)	(667.6)	(383.7)	(364.8)
Operating profit before financial and investing activities		590.5	812.3	357.5	484.0
Income and expense from financial and investing activities					
Interest and related expenses		(39.9)	(45.0)	(27.0)	(30.9)
Interest income		2.7	1.0	1.3	1.1
Foreign exchange differences, net		1.6	1.5	0.3	1.7
Dividend income	9	-	-	395.5	200.9
Gains / (losses) from investments and other financial assets - Impairment	9,10,13	-	(50.4)	(82.3)	42.5
Total profit / (loss) from financial and investing activities		(35.6)	(92.9)	287.8	215.3
Profit before tax		554.9	719.4	645.3	699.3

OTE GROUP | INCOME STATEMENTS

(Amounts in millions of Euro except per share data)	NOTES	GROUP		COMPANY	
		2022	2021 ¹	2022	2021 ¹
Income tax	23	(166.2)	(233.6)	(87.5)	(135.6)
Profit for the year from continuing operations		388.7	485.8	557.8	563.7
Profit from discontinued operations		-	103.9	-	-
Profit for the year		388.7	589.7	557.8	563.7
Attributable to:					
Owners of the parent		388.6	557.6	557.8	563.7
From continuing operations		388.6	487.0	557.8	563.7
From discontinued operations		-	70.6	-	-
Non-controlling interests		0.1	32.1	-	-
Profit for the year		388.7	589.7	557.8	563.7
Earnings per share attributable to owners of the parent from continuing operations					
Basic earnings per share	26	0.8873	1.0720	-	-
Diluted earnings per share	26	0.8873	1.0720	-	-
Total basic earnings per share attributable to owners of the parent	26	0.8873	1.2274	-	-

1. In light of the IFRS Interpretations Committee's agenda decision published in May 2022, principal vs agent assessment was revised, resulting in changes in the recognition of gross vs. net revenues. Prior-year comparatives were adjusted retrospectively. See Note 2 in the Annual Financial Report 2022.

STATEMENTS OF COMPREHENSIVE INCOME (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro)	NOTES	GROUP		COMPANY	
		2022	2021	2022	2021
Profit for the year		388.7	589.7	557.8	563.7
Other comprehensive income:					
Items that will not be reclassified subsequently to profit or loss					
Actuarial gains / (losses)	20	39.0	(6.2)	15.8	(5.2)
Deferred taxes on actuarial gains / (losses)		(8.5)	1.3	(3.5)	1.1
Deferred taxes on actuarial gains / (losses) due to change in tax rate		-	(0.8)	-	(0.8)
Total items that will not be reclassified subsequently to profit or loss		30.5	(5.7)	12.3	(4.9)
Items that may be reclassified subsequently to profit or loss					
Foreign currency translation		(0.7)	(4.2)	-	-
Total items that may be reclassified subsequently to profit or loss		(0.7)	(4.2)	-	-
Reclassification of foreign currency translation reserve related to operations disposed		-	41.9	-	-
Other comprehensive income / (loss) for the year		29.8	32.0	12.3	(4.9)
Total comprehensive income / (loss) for the year		418.5	621.7	570.1	558.8
Attributable to:					
Owners of the parent		418.4	590.6	570.1	558.8
Non-controlling interests		0.1	31.1	-	-
		418.5	621.7	570.1	558.8

OTE GROUP | CHANGES IN EQUITY STATEMENTS

(Amounts in millions of Euro)	GROUP		COMPANY	
	2022	2021	2022	2021
Total comprehensive income attributable to owners of the parent arises from:				
Continuing operations	418.4	520.7	570.1	558.8
Discontinued operations	-	69.9	-	-
	418.4	590.6	570.1	558.8

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		
Balance as at January 1, 2021	1,330.6	476.4	(132.2)	440.7	(201.6)	(3,314.1)	3,396.0	1,995.8	144.0	2,139.8
Profit for the year	-	-	-	-	-	-	557.6	557.6	32.1	589.7
Other comprehensive income / (loss)	-	-	-	-	33.0	-	-	33.0	(1.0)	32.0
Total comprehensive income	-	-	-	-	33.0	-	557.6	590.6	31.1	621.7
Cancellation of treasury shares	(38.0)	(13.6)	168.1	-	-	-	(116.5)	-	-	-
Net change of participation in subsidiaries	-	-	-	-	-	-	3.5	3.5	(173.4)	(169.9)
Dividend distribution	-	-	-	-	-	-	(426.2)	(426.2)	-	(426.2)
Acquisition of treasury shares	-	-	(193.0)	-	-	-	-	(193.0)	-	(193.0)
Share option plans	-	(0.2)	-	-	-	-	-	(0.2)	-	(0.2)
Balance as at December 31, 2021	1,292.6	462.6	(157.1)	440.7	(168.6)	(3,314.1)	3,414.4	1,970.5	1.7	1,972.2
Balance as at January 1, 2022	1,292.6	462.6	(157.1)	440.7	(168.6)	(3,314.1)	3,414.4	1,970.5	1.7	1,972.2
Profit for the year	-	-	-	-	-	-	388.6	388.6	0.1	388.7
Other comprehensive income	-	-	-	-	29.8	-	-	29.8	-	29.8
Total comprehensive income	-	-	-	-	29.8	-	388.6	418.4	0.1	418.5
Cancellation of treasury shares (Note 16)	(65.3)	(23.3)	373.6	-	-	-	(285.0)	-	-	-
Expenses related to subsidiary's share capital increase	-	-	-	-	-	-	(0.1)	(0.1)	-	(0.1)
Subsidiary's share capital reduction (Note 9)	-	-	-	-	-	-	-	-	(0.8)	(0.8)
Sale of subsidiary (Note 9)	-	-	-	-	-	-	-	-	(0.5)	(0.5)
Dividend distribution (Note 18)	-	-	-	-	-	-	(250.0)	(250.0)	-	(250.0)
Acquisition of treasury shares (Note 16)	-	-	(290.0)	-	-	-	-	(290.0)	-	(290.0)
Share option plans	-	(0.4)	-	-	-	-	-	(0.4)	-	(0.4)
Balance as at December 31, 2022	1,227.3	438.9	(73.5)	440.7	(138.8)	(3,314.1)	3,267.9	1,848.4	0.5	1,848.9

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
Balance as at January 1, 2021	1,330.6	476.4	(132.2)	440.7	(27.9)	1,171.6	3,259.2
Profit for the year	-	-	-	-	-	563.7	563.7
Other comprehensive income / (loss)	-	-	-	-	(4.9)	-	(4.9)
Total comprehensive income / (loss)	-	-	-	-	(4.9)	563.7	558.8
Cancellation of treasury shares	(38.0)	(13.6)	168.1	-	-	(116.5)	-
Dividend distribution	-	-	-	-	-	(426.2)	(426.2)
Acquisition of treasury shares	-	-	(193.0)	-	-	-	(193.0)
Share option plans	-	(0.2)	-	-	-	-	(0.2)
Balance as at December 31, 2021	1,292.6	462.6	(157.1)	440.7	(32.8)	1,192.6	3,198.6
Balance as at January 1, 2022	1,292.6	462.6	(157.1)	440.7	(32.8)	1,192.6	3,198.6
Profit for the year	-	-	-	-	-	557.8	557.8
Other comprehensive income	-	-	-	-	12.3	-	12.3
Total comprehensive income	-	-	-	-	12.3	557.8	570.1
Cancellation of treasury shares (Note 16)	(65.3)	(23.3)	373.6	-	-	(285.0)	-
Dividend distribution (Note 18)	-	-	-	-	-	(250.0)	(250.0)
Acquisition of treasury shares (Note 16)	-	-	(290.0)	-	-	-	(290.0)
Share option plans	-	(0.4)	-	-	-	-	(0.4)
Balance as at December 31, 2022	1,227.3	438.9	(73.5)	440.7	(20.5)	1,215.4	3,228.3

CASH FLOW STATEMENTS

STATEMENTS OF CASH FLOWS (CONSOLIDATED AND SEPARATE)

(Amounts in millions of Euro)	NOTES	GROUP		COMPANY	
		2022	2021	2022	2021
Cash flows from operating activities					
Profit before tax		554.9	719.4	645.3	699.3
Adjustments for:					
Depreciation, amortization and impairment	4,5,7,8,9	795.1	667.6	383.7	364.8
Costs related to voluntary leave schemes	20	39.4	(121.8)	10.7	(129.9)
Provision for staff retirement indemnities	20	3.9	(5.0)	1.5	5.6
Provision for youth account	20	(0.9)	(1.7)	(0.9)	(1.7)
Foreign exchange differences, net		(1.6)	(1.5)	(0.3)	(1.7)
Interest income		(2.7)	(1.0)	(1.3)	(1.1)
Dividend income	9	-	-	(395.5)	(200.9)
(Gains) / losses from investments and other financial assets – Impairment	9,10,13	-	50.4	82.3	(42.5)
Interest and related expenses		39.9	45.0	27.0	30.9
Working capital adjustments:					
Decrease / (increase) in inventories		(16.0)	(11.3)	(6.6)	(1.7)
Decrease / (increase) in receivables		18.7	(66.6)	11.0	(71.0)
(Decrease) / increase in liabilities (except borrowings)		45.6	89.2	(1.5)	64.0
Plus / (Minus):					
Payment for voluntary leave schemes	20	(45.6)	(56.3)	(14.5)	(44.6)
Payment of staff retirement indemnities & youth account, net of empl. contributions	20	(9.2)	(10.3)	(8.6)	(9.7)
Interest and related expenses paid (except leases)		(24.9)	(27.7)	(21.7)	(24.0)
Interest paid for leases	5	(8.7)	(15.4)	(5.6)	(6.4)
Income tax paid		(70.7)	(115.5)	(5.0)	(7.3)
Net cash flows from operating activities of discontinued operations		-	86.7	-	-
Net cash flows from operating activities		1,317.2	1,224.2	700.0	622.1
Cash flows from investing activities					
Return of capital invested in subsidiary	9	-	-	0.7	1.0
Investment in subsidiaries	9	-	-	(29.5)	(61.9)
Sale or maturity of financial assets	13	0.7	0.3	-	-
Purchase of financial assets	10	(0.6)	-	(0.6)	-
Repayment of loans receivable	20	7.2	7.2	7.2	7.2
Repayment of loans granted to subsidiary	10	-	-	4.5	-
Purchase of property, plant and equipment and intangible assets		(639.5)	(586.0)	(414.8)	(317.5)
Proceeds / (payments) related to disposal of subsidiaries / investments	9	(8.3)	288.3	(9.1)	288.3
Cash and cash equivalents of subsidiaries disposed	9	(0.7)	(89.3)	-	-
Movement in restricted cash		-	0.5	-	-
Interest received		2.7	1.0	1.3	1.1
Dividends received	28	-	-	435.5	311.8
Net cash flows from investing activities of discontinued operations		-	(57.5)	-	-
Net cash flows from/ (used in) investing activities		(638.5)	(435.5)	(4.8)	230.0

OTE GROUP | CASH FLOW STATEMENTS

(Amounts in millions of Euro)	NOTES	GROUP		COMPANY	
		2022	2021	2022	2021
Cash flows from financing activities					
Acquisition of treasury shares	16	(293.6)	(190.3)	(293.6)	(190.3)
Subsidiary's share capital reduction to minority shareholders	9	(0.8)	-	-	-
Expenses related to subsidiary's share capital increase	9	(0.1)	-	-	-
Proceeds from loans	19	300.0	350.0	190.0	451.5
Repayment of loans	19	(397.7)	(404.4)	(419.6)	(446.2)
Lease repayments	5	(83.3)	(70.0)	(32.1)	(37.2)
Financial liabilities related to wallets	24	4.0	-	-	-
Dividends paid to Company's owners	18	(249.9)	(426.1)	(249.9)	(426.0)
Net cash flows from financing activities of discontinued operations		-	(5.7)	-	-
Net cash flows used in financing activities		(721.4)	(746.5)	(805.2)	(648.2)
Net increase / (decrease) in cash and cash equivalents		(42.7)	42.2	(110.0)	203.9
Cash and cash equivalents, at the beginning of the year		630.7	516.2	274.0	105.5
Net foreign exchange differences		2.1	(1.0)	1.1	-
Transfer to spin-off activities	9	-	-	(1.4)	(35.4)
Cash and cash equivalents of disposal group classified as held for sale		-	73.3	-	-
Cash and cash equivalents, at the end of the year	15	590.1	630.7	163.7	274.0

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 2022 (IN MILLIONS €) WHERE...			
		OTE GROUP	OTE
GENERATED	Total revenues	3,455.3	1,613.3
	Operating costs*	1,598.5	803.1
	Employee wages and benefits**	481.7	101.1
DISTRIBUTED	Dividends paid to company's owners	249.9	249.9
	Income tax paid	70.7	5
	Social contribution	3.7	1.3
RETAINED		1,050.8	452.9

OTE GROUP 2022
TAXES & INSURANCE
CONTRIBUTION IN GREECE



€783.03m

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

**Personnel costs and costs related to voluntary leave schemes

TAXONOMY-RELATED DISCLOSURES

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

It aims to create 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. In 2021, the first taxonomy environmental targets "climate change mitigation" and "climate change adaptation" were supported by relevant criteria in the EU legislation. In July 2022, further criteria for specific forms of energy production were added.

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 disclosures 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).

According to the Taxonomy Regulation, the first step is to identify the taxonomy-eligible economic activities of a company. These are activities that are covered by the EU Taxonomy and thus potentially contribute significantly to achieving the environmental objectives. As a second step, these activities must be assessed for their taxonomy alignment. An eligible economic activity is considered taxonomy-aligned if it meets the technical screening criteria set out in Annexes I and II of Delegated Regulation (EU) 2021/2139. Specifically, to be considered taxonomy-aligned, an activity makes a substantial contribution to at least one of the environmental objectives, while also doing no significant harm to any other environmental objectives and meeting the Minimum Safeguards set out in the Taxonomy Regulation (EU) 2019/2088, which require, in particular, compliance with human and labour rights.

OTE Group offers a wide range of services: fixed and mobile telephony, broadband services, pay television and integrated ICT solutions. In this context, regarding the Group's core business, two of the economic activities currently listed in the EU taxonomy



are relevant (taxonomy-eligible) for the environmental objective "climate change mitigation" (Annex I of Delegated Regulation (EU) 2021/2139) due to its affiliation with the information and telecommunications sector:

- Data processing, hosting and related activities (8.1).
- Data-driven solutions for GHG emissions reductions (8.2).

Economic activities that contribute significantly to the environmental objective "climate change adaptation" were not identified for the financial year 2022.

The EU Taxonomy does not yet include criteria related to the economic activity "provision and operation of a network infrastructure for telecommunications". Consequently, the essential part of the

Group's business model is not yet covered by the taxonomy, so that it cannot present the majority of its core business as taxonomy-eligible aligned. Therefore, there are also no suitable EU taxonomy criteria with which the Group could identify its contribution to climate protection in the area of network infrastructure as taxonomy aligned.

On the other hand, the EU taxonomy lists cross-cutting activities outside our core business that are relevant to the Group's general business infrastructure, such as fleet management. The "Transport by motorbikes, passenger cars and light commercial vehicles (6.5) "cross-cutting activity for the environmental objective "climate change mitigation" is relevant for OTE Group.

OTE GROUP | TAXONOMY-RELATED DISCLOSURES

The following table provides an overview of OTE Group’s taxonomy-aligned economic activities for the reporting year 2022, breaking down both absolute values and their respective percentage share of total Group turnover, capital expenditure and operating expenditures.

TURNOVER KPI OF THE EU TAXONOMY | TAXONOMY ALIGNMENT OF ECONOMIC ACTIVITIES

	Turnover		Significant contribution to environmental objectives				*DNSH criteria scope ("Does Not Significantly Harm")						
			Climate change mitigation	Climate change adaptation	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Category "enabling activity"	Category "transition activity"
			in %	in %	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/No	E/-	T/-
Relevant total values of the Group	3,455.3	100.0											
of which: taxonomy-eligible	23.3	0.7											
of which: taxonomy aligned activities													
8.1. Data processing, hosting and related activities	0.0	0.0	100	0	N.A.	Yes	Yes	Yes	N.A.	N.A.	Yes	-	T
8.2 Data-driven solutions for GHG emissions reductions	0.0	0.0	100	0	N.A.	Yes	N.A.	Yes	N.A.	N.A.	Yes	E	-
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	0.0	0.0	100	0	N.A.	Yes	N.A.	Yes	Yes	N.A.	Yes	-	(T)
Total	0.0	0.0											
of which: not taxonomy aligned activities													
8.1. Data processing, hosting and related activities	5.3	0.2											
8.2 Data-driven solutions for GHG emissions reductions	18.0	0.5											
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	0.0	0.0											
Total	23.3	0.7											
of which: taxonomy-non-eligible	3,432.0	99.3											

*Yes: for cases criteria are set in the EU Taxonomy

OTE GROUP | TAXONOMY-RELATED DISCLOSURES

CAPITAL EXPENDITURES KPI OF THE EU TAXONOMY | TAXONOMY ALIGNMENT OF ECONOMIC ACTIVITIES

	Capital Expenditures		Significant contribution to environmental objectives				*DNSH criteria scope ("Does Not Significantly Harm")					Minimum safeguards	Category "enabling activity"	Category "transition activity"
			Climate change mitigation	Climate change adaptation	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems				
	in €	in %	in %	in %	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/No	E/-	T/-	
Relevant total values of the Group	697.0	100.0												
of which: taxonomy-eligible	18.5	2.7												
of which: taxonomy aligned activities														
8.1. Data processing, hosting and related activities	0.0	0.0	100	0	N.A.	Yes	Yes	Yes	N.A.	N.A.	Yes	-	T	
8.2 Data-driven solutions for GHG emissions reductions	0.0	0.0	100	0	N.A.	Yes	N.A.	Yes	N.A.	N.A.	Yes	E	-	
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	0.0	0.0	100	0	N.A.	Yes	N.A.	Yes	Yes	N.A.	Yes	-	(T)	
Total	0.0	0.0												
of which: not taxonomy aligned activities														
8.1. Data processing, hosting and related activities	8.5	1.2												
8.2 Data-driven solutions for GHG emissions reductions	0.0	0.0												
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	10.0	1.4												
Total	18.5	2.7												
of which: taxonomy-non-eligible	678.5	97.3												

*Yes: for cases criteria are set in the EU Taxonomy

OTE GROUP | TAXONOMY-RELATED DISCLOSURES

OPERATING EXPENDITURES KPI OF THE EU TAXONOMY | TAXONOMY ALIGNMENT OF ECONOMIC ACTIVITIES

	Operating Expenditures		Significant contribution to environmental objectives				*DNSH criteria scope ("Does Not Significantly Harm")					Minimum safeguards	Category "enabling activity"	Category "transition activity"
			Climate change mitigation	Climate change adaptation	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems				
	in €	in %	in %	in %	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/N.A.	Yes/No	E/-	T/-	
Relevant total values of the Group	2,080.2	100.0												
of which: taxonomy-eligible	21.2	1.0												
of which: taxonomy aligned activities														
8.1. Data processing, hosting and related activities	0.0	0.0	100	0	N.A.	Yes	Yes	Yes	N.A.	N.A.	Yes	-	T	
8.2 Data-driven solutions for GHG emissions reductions	0.0	0.0	100	0	N.A.	Yes	N.A.	Yes	N.A.	N.A.	Yes	E	-	
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	0.0	0.0	100	0	N.A.	Yes	N.A.	Yes	Yes	N.A.	Yes	-	(T)	
Total	0.0	0.0												
of which: not taxonomy aligned activities														
8.1. Data processing, hosting and related activities	11.6	0.6												
8.2 Data-driven solutions for GHG emissions reductions	9.5	0.5												
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	0.0	0.0												
Total	21.2	1.0												
of which: taxonomy-non-eligible	2,059.0	99.0												

*Yes: for cases criteria are set in the EU Taxonomy

Procedure for determining taxonomy eligibility and alignment

In determining the taxonomy eligibility of economic activities with which the Group generates revenues, all the companies of OTE Group are considered. As cross-cutting activities are very broad, only those activities exceeding the threshold of 0.5% of the Group's capital expenditure or 0.5% of its operating expenditure were included here. The exception is activity 6.5, as in the context of the OTE Group's climate-related commitments, seeks its fleet transformation to increase electrification. For all taxonomy-eligible activities, we look at Group level, hence the alignment followed this trend. Climate risks are managed centrally at Group level. Moreover, the Group ensures compliance with minimum safeguards through a Group-wide management system.

In order to avoid significant impacts on the environmental objective "climate change adaptation", the taxonomy alignment assessment requires an analysis of potential physical climate risks for all aforementioned economic activities. As part of the Groups "Business Continuity Management", its critical infrastructure is regularly examined for physical climate risks and takes climate adaptation

measures to minimise any such risks. In the near future, the scenario-based climate risk analysis is planned to be implemented and it will be integrated into the "Business Continuity Management".

Minimum safeguards require a management system to comply with the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights, including the declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO), the eight fundamental conventions of the ILO and the International Bill of Human Rights. The OTE Group is explicitly committed to adhere to the aforementioned principles and fulfil its human rights due diligence obligation, which derives from the UN Guiding Principles on Business and Human Rights; risk assessment that covers the Group is performed and with which it monitors compliance with social and environmental standards. To this end, suppliers are obligated 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.

The Group also maintains a constant dialogue with employee representatives and trade unions. To avoid corruption and

ensure fair competition, the Group has an extensive Compliance Management System (CMS). The Compliance Management System, which mainly focuses on prevention measures, addresses the compliance of all - employees and Management - with current legislation, the Code of Conduct and internal Policies. The key elements of the CMS are:

- The prevention of misconduct in parallel with compliance with the policies provided for by the CMS. In this way, both the Group and its employees are protected from any legal consequences due to misconduct, while the reputational risks of the Group are reduced.
- The detection of compliance violations and the response to them. In order to provide the ability of reporting any violations of Policies, regulations and the legislation in force, the Company has established the relevant **communication channels**.

The Compliance Management System is certified with **ISO 37001:2016** (Anti-Bribery Management Systems) and **ISO 37301:2021** (Compliance Management Systems) by an independent certification body.

For more information more about minimum safeguards, please visit the following

sections of the 2022 Annual Financial Report: **D. RISKS AND UNCERTAINTIES FOR THE NEXT YEAR** ("Supply Chain" & "Compliance, Corruption, Bribery and Human Rights' risks"), **D. Board of Directors and Committees that consist of members of the Board of Directors – Remuneration of the Board Members/ Remuneration of executive Board Members - Other administrative, managerial or supervising corporate bodies or committees** ("1.10 (I) Management of conflicts of interest situations), (II) Management of transactions with related parties, (III) Education Policy, (IV) Suitability Policy"), **E. NON FINANCIAL REPORT** ("Systems & Policies") and **F. CORPORATE GOVERNANCE STATEMENT** ("C. Internal Control System").

Economic activities relevant to turnover

The taxonomy-eligible economic activity "Data processing, hosting and related activities" (8.1) covers the "Storage, manipulation, management, movement, control, display, switching, interchange, transmission or processing of data through data centres, including edge computing". In addition to data centre spaces under the Group's care, partial spaces of external providers ("operated on co-locations") were also included in the evaluation.

OTE GROUP | TAXONOMY-RELATED DISCLOSURES

To be considered taxonomy-aligned, data centres must comply with the European Code of Conduct for Data Centre Energy Efficiency. In addition, the Global Warming Potential of the cooling agents used must not exceed the value of 675 kgCO₂e. The OTE Group has not signed the Code of Conduct for Data Centre Energy Efficiency, even though it follows the practices that derive from the Code in its Data Centers. Concerning the cooling infrastructure, the Group follows the EU regulation on fluorinated greenhouse gases, but refrigerants with global warming potential GWP value that exceeds the limit of 675 kgCO₂e are used. For aligning with the taxonomy, major air condition system renovation is required which could be considered in case of site renovation in the future.

The solutions and products of the Group which, according to the provisions of the EU taxonomy, are "predominantly aimed at the provision of data and analytics enabling GHG emission reductions", are assigned to the economic activity "Data-driven solutions for GHG emissions reductions" (8.2). These are solutions and products that have a clear potential to save CO₂ emissions on the user side. Within the Group-wide business activities, the following taxonomy-eligible services were identified:



- Web and video conferencing (saving travel-related CO₂ emissions).
- Workplace and cloud solutions (increasing energy efficiency through improved server utilization).
- IoT/mobility solutions (saving CO₂ emissions through route optimization).

As proof of the taxonomy alignment of the solutions, the technical screening criteria require a life cycle analysis. This analysis must demonstrate that the solution causes "significantly fewer greenhouse gas

emissions" over the entire life cycle than comparable solutions available on the market whose greenhouse gas balance is considered "best in class". The technical screening criteria do not specify a concrete threshold for "significant" greenhouse gas savings measured against the alternative solution. Since greenhouse gas balances of specific solutions offered on the market were not available on the market for competitive reasons, a relevant examination was not possible nor practical.

Cross-cutting activities

OTE Group leases and operates vehicles fleet, mainly consisting of passenger cars and light commercial vehicles. These kind of functions are identified to fall within the economic activity of "Transport by motorbikes, passenger cars and commercial vehicles" (activity 6.5). Moving forward to reach OTE Group's climate related commitments, it implements activities that contribute to the EU environmental objective of Climate Change Mitigation, whilst ensures that the same activities will not do significantly harm to any of the other environmental objectives and goals defined. OTE Group conducts a comprehensive plan for the transformation of its fleet vehicles towards sustainability, consistent with sectoral and national adaptation plans and strategies in the areas of vehicle electrification and charging infrastructures. In this context, at every vehicle tender we pursue, we request the procurement of a significant proportion of low and zero direct (tailpipe) CO₂ emissions vehicles, such as chargeable hybrid electric vehicles (plug-in hybrid, PHEV) and battery electric vehicles (BEV) being powered by electricity from renewable energy sources.

Calculation of the taxonomy KPIs

For the year under review, the total values of the Group on which the calculation according to the EU taxonomy is based amounted to €3.5 billion for turnover, €0.7 billion for capital expenditure and €2.1 billion for operating expenditure. The turnover according to the EU taxonomy corresponds to the turnover in the consolidated profit and loss account. The relevant capital expenditure was determined on the basis of the consolidated balance sheet and results from the sum of additions and changes in the scope of consolidation of property, plant and equipment, intangible assets (excluding goodwill) and rights of use. In accordance with the regulations of the EU taxonomy, the information on capital expenditure is not part of a capital expenditure plan. Relevant operating expenses are defined by EU taxonomy as expenses for research and development, building refurbishment, short-term lease, maintenance and repair and other direct expenses relating to the day-to-day servicing of assets of property, plant and equipment. They are reported in the consolidated income statement as operating expenses.

The data/information on turnover, capital expenditure and operating expenditure

shown below as taxonomy-eligible or taxonomy aligned are directly allocated to the operation of data centres in accordance with the economic activity 8.1 or with the provision of ICT solutions according to economic activity 8.2 at product Group level. No turnover was generated with the cross-cutting activity 6.5.

The taxonomy-eligible turnover for economic activity 8.1 can be transparently and unambiguously allocated to the operation of specific data centres by means of a suitable key. The key is calculated from the number of network components operated at each data centre location in relation to the total number of components used in the Data Processing business segment. Capital expenditure with a clear reference to a data centre is allocated directly to that data centre.

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 2022. 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). Total Capex consists of additions to tangible and intangible assets during the financial year, before depreciation, amortisation and any re-measurements, including those resulting from revaluations and impairments. It includes additions to tangible and intangible assets, right-of-use assets and additions resulting from business combinations.

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, 2022 and for the year then ended" within the Annual Financial Report 2022: The line "Additions and transfers" including the line "Disposals and transfers-cost" of categories "Construction in progress" and

"Investment supplies" of **"Property, plant and equipment"** (Note 4), and the line "Additions" **"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, short-term lease, 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

OTE GROUP | TAXONOMY-RELATED DISCLOSURES

Separate) as of December 31, 2022. 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 contracts with customers is recognized when control of the goods or services is transferred to the customer at an amount that reflects the consideration to which the Group or the Company expects to be entitled in exchange for those goods or services.

Since the EU taxonomy does not yet adequately cover the Group's core business,

concerning telecom network operation, an aggregated view of the taxonomy eligibility of all economic activities results in only a small taxonomy-eligible proportion of turnover (0.7%), capital expenditure (2.7%) and operating expenditure (1.0%) for OTE Group for the 2022 financial year as well.

The largest proportion of taxonomy-eligible turnover is accounted for by economic activity 8.2 "Data-driven solutions for GHG emissions reductions". In relation to the relevant Group total turnover, the taxonomy eligible turnover of the 8.2 "Data-driven solutions for GHG emissions reductions data processing and hosting" amounts to 0.5%. In second place with 0.2% turnover is the taxonomy-eligible turnover of the economic

activity 8.1 "Data processing, hosting and related activities".

The largest proportion of taxonomy-eligible operating expenses is accounted for by economic activity "Data processing, hosting and related activities" (8.1), which amounts to 0.6% of the Group's total operating expenses. In second place with 0.5% operating expenditure is the taxonomy eligible operating expenditure for economic activity 8.2 "Data-driven solutions for GHG emissions reductions".

As 6.5 "Transport by motorbikes, passenger cars and light commercial vehicles" is a cross-cutting activity and not part of OTE Group's core business, it doesn't generate turnover, while the percentage of the

taxonomy eligible capital expenditure amounts to 1.4%. Moreover, the taxonomy eligible capital expenditure for the 8.1 "Data processing, hosting and related activities" amount to 1.2% of total capital expenditure.

In the 2022 financial year, there was no taxonomy-aligned proportion of turnover, capital expenditure and operating expenditure of the Group's taxonomy eligible economic activities.



In this section:

- 1.1 Environmental Strategy
- 1.2 Energy and Climate Change
- 1.3 Circular Economy
- 1.4 Electromagnetic Fields
- 1.5 Other Environmental Aspects



Environment

-89%

DIRECT & INDIRECT
(FROM ENERGY)
GHG EMISSIONS VS 2017

100%

USE OF RENEWABLE
ENERGY SOURCES FOR
ELECTRICITY CONSUMPTION

0

ICT WASTE¹

>730,000

OF CPEs² & MOBILE DEVICES³
COLLECTED & SUSTAINABLY MANAGED
(REFURBISHED/ RECYCLED)

¹ Sustainable management of waste generated from telecom & retail network, buildings and datacenters
² Customer premises equipment eg routers & TV decoders
³ Smartphones, Mobile Phones, Fixed Phones (wired and cordless), Notebooks/Laptops, Tablets, Wearables, Chargers/Powerbanks & Accessories

1.1 ENVIRONMENTAL STRATEGY



OTE Group fully understands that there are environmental impacts associated with the value chain of the Information & Communication Technologies 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.

OTE group is committed to integrating sustainability across its value chain, thus contributing to addressing environmental challenges such as climate change and overconsumption of natural resources.

In this context, the OTE Group's environmental strategic priorities, aligned with the ones of DT Group and taking into consideration the materiality analysis results, are: Climate Neutrality and Circular Economy throughout the value chain.

OTE GROUP IS COMMITTED TO:



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.

For both areas, ambitious targets, at DT Group level, have been set, concrete measures, related to core business, are designed and implemented and necessary resources are being secured.

To this end, making progress toward the climate change targets is, as of 2022, a

performance-related component of Top Management **remuneration**. Details on performance, commitments and measures implemented are presented in the relevant sections of this report.

To achieve its commitments, the Group acts at different levels to:

1. ENVIRONMENT | 1.1 ENVIRONMENTAL STRATEGY

- Analyze environmental risks and opportunities.
- Monitor environmental performance in a timely and transparent manner.
- Address climate change through energy efficiency improvements and Renewable Energy Sources use.
- Enable the electrification of our transportation activities, considering the maturity of the market and the technology, as well as the availability of vehicle charging infrastructure.
- Integrate the principles of circular economy into its activities to improve resources efficiency in own operations but also on upstream (suppliers) and downstream (customers) activities.
- Recycle the majority of the waste generated.
- Increase the lifetime and decrease the footprint of the products sold/leased to customers while ensuring recycling at the end of their lifetime.
- 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)
- Secure high ratings by international sustainability and SRI analysts.

Aiming at effective environmental management along the entire value chain, companies of OTE 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 conditions brought about by the pandemic crisis and the response to it (lockdown, mobility restrictions, teleworking) as well as the volatility of the energy markets (loosening pandemic restrictions and war in Ukraine), 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.

The sustainability governance structure, the decision-making process within the company (key decisions are made or approved by the BoD) but also the established procedures in the context of the integrated management system ensure the consistency between our engagement with stakeholders including policy makers (e.g., in the context of public consultation processes) and our sustainability strategy and commitments.

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

1. ENVIRONMENT | 1.1 ENVIRONMENTAL STRATEGY

(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.

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 and national mid-term and long-term climate change targets, 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.
- The European Commission has released a series of legislative proposals ("Fit for 55") setting out how it intends to achieve its revised and more ambitious climate targets. For example, the European Council agreed to set a binding EU-level target of 40% of energy from renewable sources in

- the overall energy mix by 2030 (from at least 32% that is the current EU-level target). Negotiations for the legislative proposals are in progress. 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, Greece has put into force the Greek Climate Law (May 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 2022, revenues from ICT products and services continued to increase (+26.4% compared to 2021).

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

1. ENVIRONMENT | 1.1 ENVIRONMENTAL STRATEGY

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, investors seek to engage with companies that have an effective environmental policy in place, as shown by private sector initiatives (e.g., TCFD, Science-Based Targets initiative).

With respect to physical impacts, telecom infrastructure could be affected by extreme weather events that may affect network operation and the availability of the telecommunication services provided. 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**.

ENVIRONMENTAL AWARENESS ACTIVITIES: DT EU GOOD CAUSE ENVIRONMENTAL INITIATIVE



In 2022, OTE Group collected more than 155,000 old devices. Taking this positive environmental impact one step further, COSMOTE in collaboration with ENALEIA contributed in the Mediterranean Clean Up project, by facilitating the removal of more than 8,000 kg of waste- most of which plastic- from the seas and beaches in four Greek islands: Corfu, Kefalonia, Skiathos, and Crete. 100% of the collected waste was sustainably managed and more than 55 percent of the plastic collected was sent for recycling by ENALEIA’s certified partners. It will be returned to the economy after conversion into new recycled products.

Telekom Romania Mobile Communications collected almost 9,000 mobile devices and collaborated with the Mai Mult Verde (“more green”) Association for the reforestation of a riverbank in the Giurgiu area. At least 5,000 trees were planted on one hectare near the Danube riverbank. Employees could volunteer to take part in the reforestation. This initiative is also part of a pilot project (launched in fall 2022) run by the Mai Mult Verde Association to plant the first community forest in the municipality of Giurgiu, Romania. This is a unique concept in Romania, which has the potential to become an example of best practice in establishing urban forests directly involving the communities and local authorities they serve.

These collaborations were launched as part of the common Good Cause environmental initiative that was adopted by all 10 National Companies in the DT EU segment, planning to give an additional positive environmental dimension to the take-back schemes for used mobile devices.

1.2 ENERGY AND CLIMATE CHANGE



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 2022](#)).



Climate is changing, global temperature is increasing, and urgent global action is needed. As noted by UN Secretary General, “Countries must re-prioritise climate change or the world faces catastrophe”.

Climate change represents a priority within the OTE Group Sustainability Strategy and as a result OTE Group has in place a climate change strategy with ambitious targets that addresses mitigation activities across its value chain, while allowing for its adaptation to a new “environment” (climate, regulation, economy).

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. In addition, the energy crisis stresses the need to intensify efforts towards climate neutrality. OTE Group has developed an integrated climate change strategy that is aligned with its business strategy and is putting in place all necessary tools to enable the successful implementation of the strategy.

In line with the DT Group, the climate change strategy is structured along 4 main pillars:



CLIMATE CHANGE STRATEGY PILLARS



VALUE CHAIN EMISSIONS

Monitoring and defining appropriate performance indicators are key elements of the strategy as they allow for the transparent disclosure of OTE Group progress against its commitments, defining key emissions sources and the early identification of potential delays. 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, together with the necessary resources, to achieve them. The approach is to reduce emissions to the extent technically and economically feasible and emissions that cannot be reduced will be neutralized by means of high-quality compensation and carbon capture projects in accordance with the established framework.



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 2022 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.



ENABLEMENT: POSITIVE CLIMATE PROTECTION EFFECTS ON CUSTOMERS

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 not only invests in New Generation Networks, creating infrastructure which will boost the Greek economy and create growth potential but is also developing products and services to realize this potential.

1. ENVIRONMENT | 1.2 ENERGY AND CLIMATE CHANGE



OTE GROUP CONTRIBUTES TO DT GROUP-WIDE CLIMATE CHANGE STRATEGY 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.

In March 2023, DT adopted a more ambitious interim target, based on the Science Based Targets initiative's (SBTi) Net-Zero Standard, on the way to becoming climate neutral. The target is to reduce Scopes 1–3 GHG emissions by 55% with respect to 2020 levels. More details [here](#).

Value Chain Emissions

Monitoring energy consumption

Total energy consumption of OTE Group in 2022 amounted to 585.2 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 2.9% compared to 2021, as there was a reduction in almost all activities (except for road transportation that consumption remained at 2021 levels). Data centers and electricity generators contributed the most to this change, presenting a decrease of 14% and 17% respectively, compared to 2021. With respect to 2017, energy consumption decreased by 6% at OTE Group level (10% in Greece).

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 24% or the number of subscribers (e.g., in Greece fiber service subscribers increased by 26% and TV subscribers increased by 3%, compared to 2021). 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 and Direct Purchase) GHG emissions from energy consumption in 2022, amounted to 15,258 t CO₂ eq, that is 89% lower compared to 2017 levels, while emissions in **Greece were about 86% lower than 2017 levels.**

Following the location-based approach for Scope 2 emissions (i.e., using an average grid emission factor), energy consumption emissions are estimated at 201,081 t CO₂ eq, down by 25% compared to 2021. The further integration of RES in the national electricity generation systems has made a major contribution to this change.

Total GHG emissions (including f-gases fugitive emissions, Scope 1 from energy consumption and market-based scope 2 emissions) were estimated at 23,209 t CO₂ eq, which is a **10% decrease compared to 2021.**

For 2022, indirect (scope 3) GHG emissions were estimated at about 420 kt CO₂ eq at Group level (excluding indirect use of sold services), and at 670 kt CO₂ eq with indirect

use of sold services included. About 77% of scope 3 emissions (both at Group level and Greece) 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 (excluding indirect use of sold services) decreased by 22%.

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 (e.g., CDP supply chain program). Emphasis is given to working with suppliers of end-use telecom devices and telecom

infrastructure that account for the majority of emissions from categories 1 and 2 of scope 3 emissions.

Energy efficiency is the main priority for reducing customers' emissions (i.e., from electricity consumption). In this, all energy-related requirements of the ecodesign regulations for the products sold or leased are met. To further improve efficiency, 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 CO₂ eq (Greece). This estimation takes into account paper recycling, reduction of paper, roof-top photovoltaics 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 and available options for sourcing “green” electricity are examined.

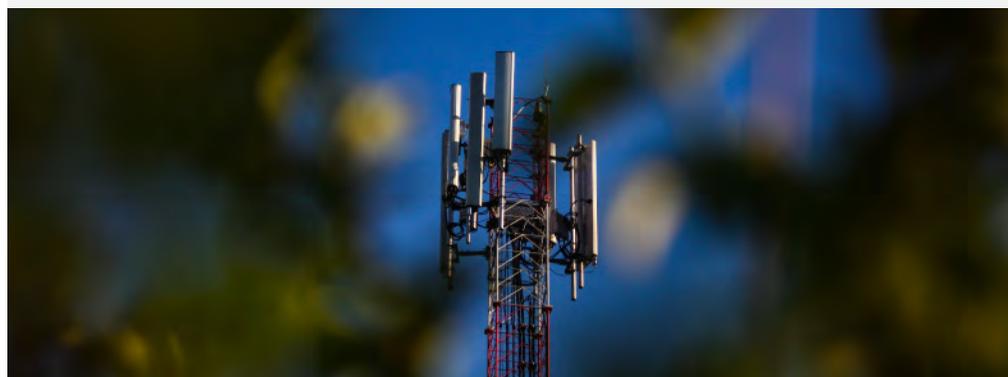
OTE Group has secured (for the 12th consecutive year for Greece), from its electricity providers for 2022, Guarantees of Origin (GOs), assuring that the listed amount of electricity consumption has been produced from Renewable Energy Sources. **The GOs secured (Greece and Romania) and the Direct Purchase of RES electricity (Romania) cover 100% of the 2022 electricity consumption of the Group.** In terms of total energy consumption, this corresponds to 90% at Group level (88% in Greece).

RES electricity generation (autonomous photovoltaic units in 15 base stations, small wind turbine systems in 2 base stations and 2 roof-top photovoltaic systems of 222 kWp installed capacity) in 2022 amounted to about 540 MWh in Greece.

In Romania, OTE Group RES electricity generation is estimated at 990 MWh. Telekom Romania Mobile Communications is implementing an ambitious plan for connecting its base stations to solar panels

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 22 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 6% 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 the aim of replacing the current power sources with renewable energy. In 2022, more than 500 base stations were equipped with photovoltaic panels. This is an investment that contributes to ensuring a greener future for Romania, while it will

considerably reduce the company’s carbon footprint in upcoming years.

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 is ongoing and conversion to a hybrid status making use of RES is 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)

1. ENVIRONMENT | 1.2 ENERGY AND CLIMATE CHANGE

and cabling infrastructure. Efforts to reduce Power Usage Efficiency (PUE) values (in 2022 PUE remained at about 2021 levels) and improve efficiency are on-going as this would allow compensation for the increasing data traffic. Efforts include not only the implementation of measures mentioned above but also the testing of innovative solutions such as Immersion Cooling that allow servers and IT components to be submerged inside a non-conductive cooling liquid. COSMOTE Datacenter Teams are the first teams in Greece to test this technology that creates a sustainable ‘Green Datacenter’. Air-conditioning units are not necessary, resulting in up to 90% energy savings on cooling, an overall increase in productivity and reduction of up to 30% in terms of carbon footprint.

With regard to buildings and stores, renovations and day-to-day operation are carried out in such a way as to reduce energy consumption and CO₂ emissions. Four OTE Group buildings have already received **LEED** environmental certifications (GOLD level). The certification of two other iconic buildings (OTE Headquarters and NYMA) that are currently being renovated, is on the way.

Additionally, stores are renovated with recyclable and environmentally friendly materials and equipment to improve energy performance and reduce emissions while enhancing customers’ awareness.

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

The goal is to create, considering market and technology maturity, as well as the availability of vehicle charging infrastructure, an eco-friendly fleet of vehicles, with capacity for battery charging of PHEVs and BEVs on a daily basis. By the end of 2022, 300 corporate vehicles have been replaced by PHEV, while 33 BEV were recently leased in Greece. 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. By 2023, the construction of 215 charging stations at the Group’s buildings/facilities will also have been completed.

- Aiming at promoting sustainable urban mobility COSMOTE launched a pilot program for the use of electric bicycles (e-bikes), in order for technicians from COSMOTE Technical Services to respond quickly and flexibly to its customer needs in urban centers. The program facilitates technicians’ transportation in crowded urban centers where parking is difficult. E-bikes have already started being used in four Greek bike-friendly cities (i.e., with cycle lanes, pedestrian paths, and morphologies that favor cycling). Bikes are used by volunteer technicians of COSMOTE Technical Services. They are provided with the necessary safety equipment (helmets, gloves, reflectors) and have been through special training.

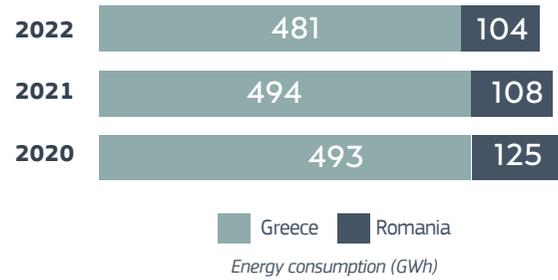
In 2022, the energy efficiency projects implemented resulted in an energy conservation of 30.6 GWh (~5% of energy consumption in 2022), while avoided GHG emissions are estimated at 11.3 kt CO₂ eq. As a result of the measures implemented, the efficiency of energy use in the telecom companies of the Group (i.e., total energy consumption per volume of data transferred) improved by about 40% compared to 2020, reaching a value of 66 kWh/TB in 2022 (56 kWh/TB in 2022 for



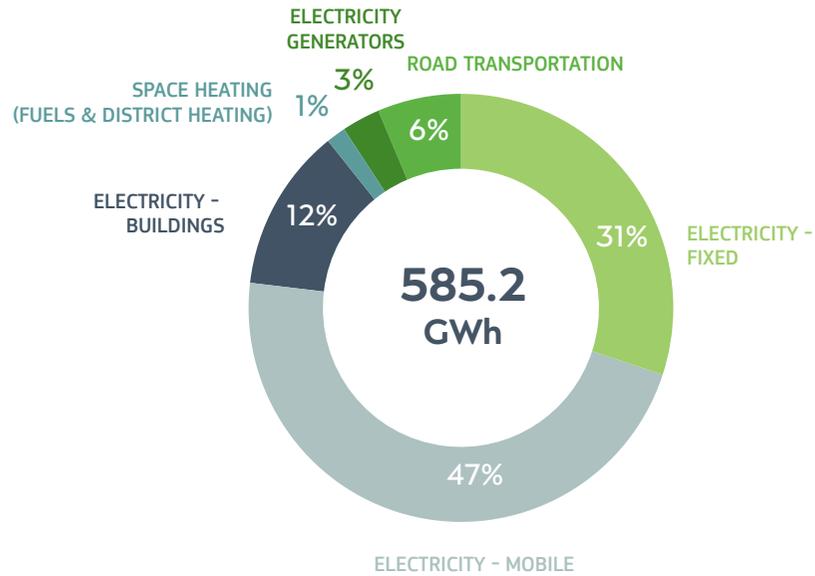
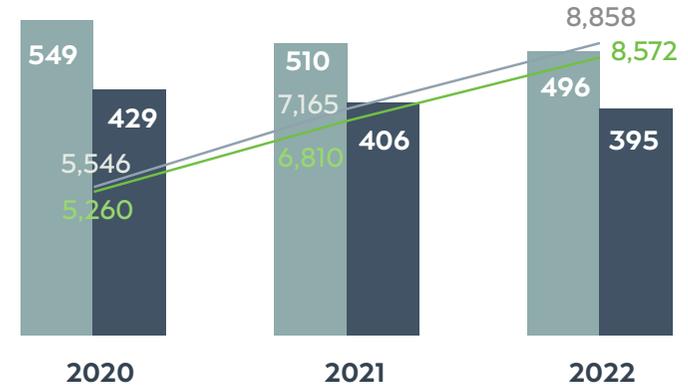
300 CORPORATE VEHICLES HAVE BEEN REPLACED BY PHEV

Greece). The data traffic emissions intensity (location-based) reached a value of 23 kg CO₂ eq/TB (from 53 kg CO₂ eq/TB in 2020), while the market-based intensity (i.e., including the effect of the GOs secured) is estimated at 2 kg CO₂ eq/TB. Energy and GHG emissions intensities have also improved.

1. ENVIRONMENT | 1.2 ENERGY AND CLIMATE CHANGE

ENERGY CONSUMPTION OTE GROUP
PER COUNTRY

PER ACTIVITY

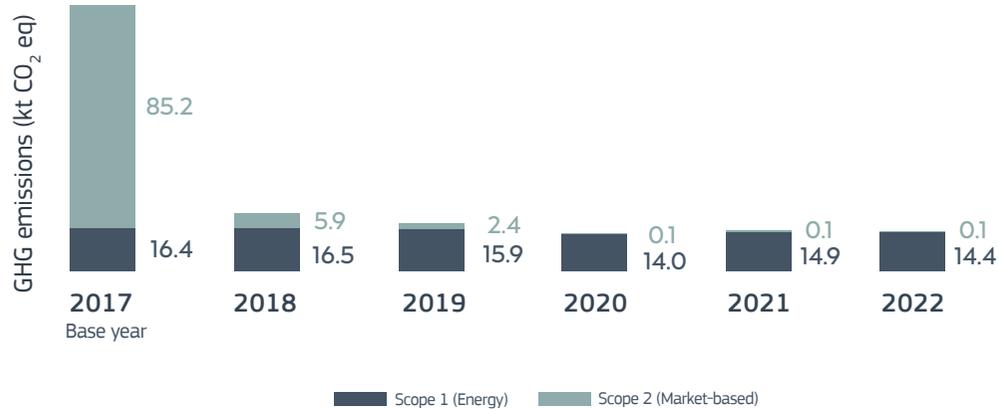
ENERGY CONSUMPTION
& DATA TRAFFIC (GREECE)

Energy (GWh)
 Energy Greece (GWh)
 Data Traffic (Pbyte)
 Data Traffic Greece (Pbyte)

1. ENVIRONMENT | 1.2 ENERGY AND CLIMATE CHANGE

GHG EMISSIONS FROM ENERGY

OTE GROUP (GREECE) 2017-2022

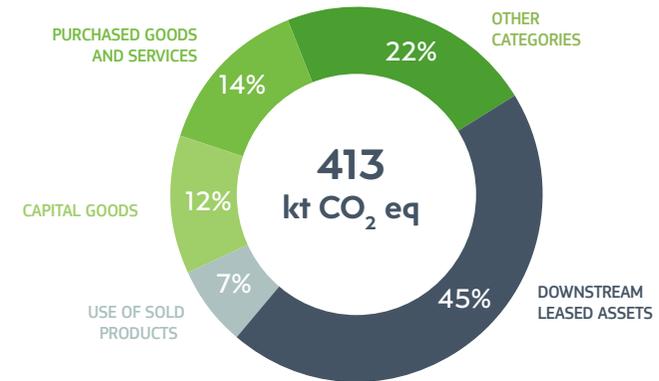


100% RES ELECTRICITY SINCE 2020
(GUARANTEES OF ORIGIN AND DIRECT PURCHASE)



SCOPE 3 EMISSIONS PER CATEGORY

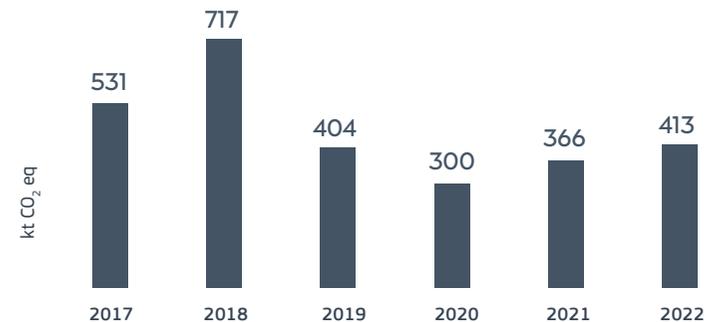
OTE GROUP (GREECE) 2022



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
3. Indirect use of sold services is excluded

SCOPE 3 EMISSIONS

OTE GROUP (GREECE) 2017-2022



1. ENVIRONMENT | 1.2 ENERGY AND CLIMATE CHANGE

ENERGY CONSERVATION
OTE GROUP 2022

ENERGY CONSERVATION
30.6 GWh

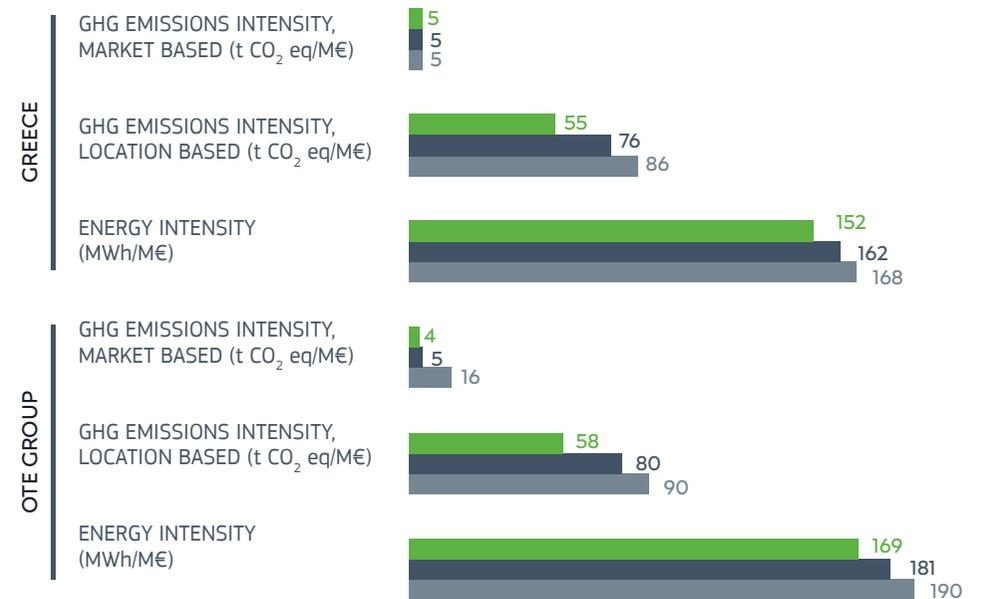
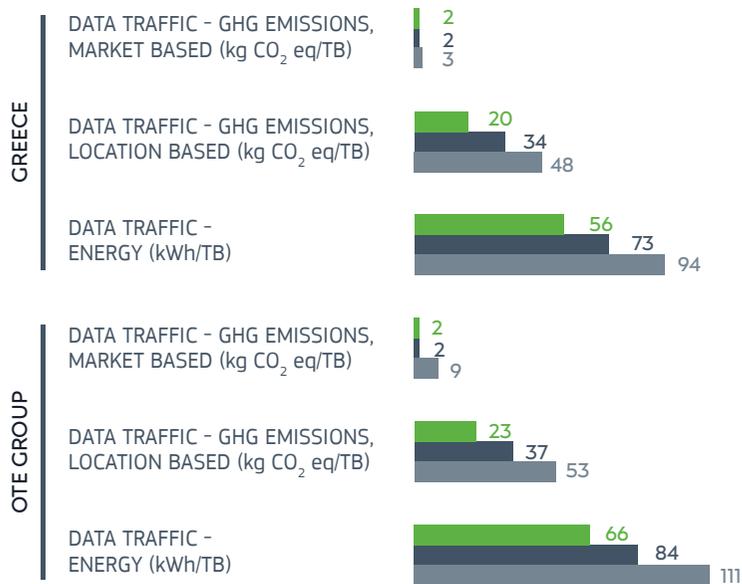


DATA TRAFFIC INTENSITIES

■ 2022 ■ 2021 ■ 2020

ENERGY AND GHG EMISSIONS INTENSITIES

■ 2022 ■ 2021 ■ 2020



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

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

A detailed list of the measures implemented in 2022 is presented in the Appendix: [Environmental Performance Data – Energy](#).



1. ENVIRONMENT | 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. At the same time, 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 necessary 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. However, current national projections and commitments globally, show a lack of expected progress in reducing GHG emissions and leave the world in a path towards a temperature rise far above the Paris Agreement goal of well below 2°C, as noted by the **Emission Gap Report 2022** prepared by the UN Environmental Programme (UNEP).

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 increase of the footprint of the sector in a business-as-usual scenario. This translates into an abatement potential of 668 Mt CO₂ 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.

Information and Communications Technologies (ICT) have an enabling role in making the difference in the climate change, by providing opportunities for its further enhancement. Under this scope, OTE Group is developing products and services that address this strategy towards a more sustainable future (see more on **Products and Services for Sustainability** and **Research and Innovation** sections). In this:

- (a) Connectivity services contribute to the reduction of transportation needs, substitution of emissions-intensive products, processes, etc. (dematerialization), and to the development of e-commerce and e-governance. Additionally, they can enhance safety and productivity.
- (b) Services and solutions 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 adaption of smart cities solutions by the municipalities, thus improving and protecting the urban environment. The solutions can contribute to the better use of the municipalities resources, from car parking and street lighting to air quality monitoring, waste and water management.
- The monitoring and management of energy consumption.
- The monitoring and management of vehicle fleets as well as of driving behavior and performance.
- The reduction of business travels by using advanced collaboration tools.
- The interconnection of systems and the better utilization of information.

*It is noted that the EU Taxonomy does not yet include criteria related to the economic activity "provision and operation of a network infrastructure for telecommunications". Consequently, the essential part of the Group's business model is not yet covered by the taxonomy, so that it cannot present the majority of its core business as taxonomy-eligible aligned. Therefore, there are also no suitable EU taxonomy criteria with which the Group could identify its contribution to climate protection in the area of network infrastructure as taxonomy aligned. Services described above, as well as data center services, have been reported in the **NFR part** of the OTE Group Annual Financial Report 2022.*



According to the **latest IPCC report** "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."

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. Circular economy is one of the four priorities of the OTE Group Sustainability Strategy and policies are in place (OTE Group Suppliers Code of Conduct, Sustainability Policy, Integrated Management System Policy) that provide the basis for the implementation of circular economy in OTE Group activities. A holistic approach is applied that integrates principles of circular economy (5R: Refuse, Reduce, Repair, Reuse, Recycle), and covers own operations (telecom network, data centers, fleet, offices and shops), suppliers and customers.

In line with the DT strategy on circular economy and the [DT EU ESG strategy](#), initiatives and actions in place concern the design, the manufacturing specifications and the use phase of the products/equipment used internally or sold, allow for the repairability of products and

equipment, aim at reuse to the extent that is technical feasible and ensure, as a final option, the recycling of waste generated. The initiatives in place contribute to the increase of materials recovery and the decrease of waste generated and disposed.

At the same time, services and initiatives developed, such as eco-rating, e-bills or the take-back scheme for mobile devices, are expected to increase public awareness on issues related to resources efficiency, recycling practices, etc.

Circularity in the supply chain

OTE Group companies do not actually manufacture any products themselves but provide telecommunications services as well as end devices under their brand name. Aiming at environmental protection and 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](#)). Issues related to hazardous substances and conflict minerals are addressed. These requirements are described in the [OTE Group Supplier Code](#)

[of Conduct](#) as well as in the OTE Group [Code of Human Rights and Social Principles](#).

Setting appropriate technical specifications is a major tool in introducing circular economy requirements in products (end

devices or telecom equipment). Specifications range from eco-design requirements, restrictions on the use of hazardous substances and EMF-related requirements (see section [Responsible Marketing](#)) to repairability requirements,



1. ENVIRONMENT | 1.3 CIRCULAR ECONOMY

sustainable packaging, use of FSC certified paper, etc. The aim is to provide (or use internally) products and equipment that are energy efficient, can last long, are safe to use, can be easily repaired and reused (fully or partially), or eventually recycled with maximum recovery of constituent materials.

Circularity for products and services

Eco Rating

Eco Rating is an industry driven initiative launched by a consortium of leading mobile telecom providers (Deutsche Telekom, Orange, Telefónica - operating under the O2, Vivo and Movistar brands -, Telia Company and Vodafone). The scope is to evaluate the environmental impact of new mobile phones from production, transportation to use and final disposal. By the end of 2022 there are more than 20 mobile suppliers that support this initiative and provide raw data about their device models that is then assessed through the Eco Rating methodology.

By end of 2022 more than 300 devices had been assessed. The assessed devices can be found on the eco rating [website](#) and in the shops (physical and online) of the participating mobile operators.

The criteria considered in the Eco Rating

evaluation concern durability, repairability, recyclability, resource efficiency and climate efficiency. A harmonized approach is followed, which results in an overall score on a scale from 1 to 100. The closer the score is to 100, the better the sustainability performance of the device.

The Eco Rating scheme provides information to customers to take more sustainable decisions on selecting a device, is expected to motivate manufacturers towards more sustainable products and increased transparency within the industry.

For 2022, about 1% of mobile phones sold receive an Eco Rating evaluation of more than 85 points, that is devices with a more sustainable profile.

Sustainable Packaging

Products need packaging to be protected during transportation from manufacturing site to consumer, but packaging has a significant environmental impact, as natural resources are consumed while packaging waste pollutes air and soil and accounts for about half of marine litter. The amount of packaging waste generated is growing faster than the recycling, even though recycling rates have increased (in EU).

OTE Group, as a member of DT Group, aims at reducing packaging materials and is

SUSTAINABLE PACKAGING TARGET 


100%

FOR OWN BRANDED NEWLY LAUNCHED DEVICES
(SINCE MID 2022)

FOR 3rd PARTY SMARTPHONES SOLD BY THE COMPANY
(BY 2025)

converting own branded products packaging materials to sustainable alternatives following the DT Group packaging guideline. In 2022, COSMOTE launched the Speedport Plus 2 router that was sustainably packaged (and more energy efficient compared to the one replaced). Packaging is plastic-free, the majority of the device housing is made of recycled plastic (about 95%), while paper used is by 80% recycled paper and the rest 20% is FSC certified paper. As a result, there is an avoided virgin plastic and paper production of 4 g and 76 g per device, respectively. If device housing is also considered, then the avoided virgin

plastic production is estimated at 340 g per device.

Sustainable product packaging is also required for non-COSMOTE-branded devices that are sourced from third-party providers. By the end of 2022 about 85% of mobile phones sold (smartphones and simple phones) were sustainably packaged.

The use of packaging materials for the refurbished end devices is also reduced (compared to those received from suppliers) as plastic is only used for the IR control and the power supply unit.

e-bill for customers in Greece

Considering that OTE Group companies are not actually manufacturing any products themselves but provide telecommunications services, paper is among the materials directly used. Paper use covers the needs of office operations but also of communications with customers (e.g., bills for the services provided).

To address the latter, customers have the option to choose to receive their bills exclusively online (e-bill). In 2022 the use of the e-bill option resulted in paper savings of 524 t (Greece). For customers who still receive their bills in hard copy, all bills are printed on FSC certified paper (Greece).

1. ENVIRONMENT | 1.3 CIRCULAR ECONOMY

ICT for circularity

In 2022, OTE Group launched and developed services targeting the smart waste management at municipality level. The solution utilizes Narrow-Band Internet of Things (NB-IoT) technology that requires a small amount of data to interconnect devices over the mobile network, in order to achieve remarkable results in reduction of energy and cost consumption.

COSMOTE will install telematics devices in 5,300 mechanical waste collection bins operated by a major Municipality in Attica (Greece), allowing its cleaning service to monitor, remotely and in real time, how full they are and their status, while also dynamically planning for their placement to match demand, through a data analysis and evaluation platform run by a specialized Digitalization of Things (DoT) company. Additionally, tablets with a drivers' navigation App will be installed in all of the Municipality's waste disposal trucks, for targeted routing of collection vehicles based on actual collection needs.

The advantages of the solution include reduction of collection operating costs (up to 50%) by streamlining routes, emissions reduction, savings on fuel and human resources, prevention of overfilling, and protection from damage.

Circularity in own operations

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 covering all activities nationwide.

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 and 2022 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

cutleries. The above-mentioned items were replaced with paper or biodegradable ones. Overall, the use of more than 1.1m single-use plastic items was avoided in 2022. 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 1.4 mil pieces of plastic was avoided in 2022.

Reduce paper use

Paper consumption at OTE Group level amounted to 121 t or 11.3 kg per employee showing a decrease of about 10% compared to 2021. Paper consumption of the companies within the scope of the Paperless office target decreased by 20% with respect to 2020. The Digital Transformation project but also the pandemic crisis with the increased teleworking rates have both contributed to the observed reduction.

The utilization of IT applications in the context of the broader digital transformation program of OTE Group, resulted, in 2022, in paper savings of 532 t in Greece (including the effect of e-bill).

To reduce the environmental impact of printing, on top of initiatives to reduce paper consumption, refilled cartridges (60% of total consumption) are used.



**2023
#ZEROPLASTIC
TARGET**



**RETAIN
SINGLE USE PLASTIC CULTURE
IN MAJOR BUILDINGS**



**PAPERLESS
OFFICE TARGET**



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

The target refers to OTE, COSMOTE, CTS, COSMOTE E-Value, GERMANOS

1. ENVIRONMENT | 1.3 CIRCULAR ECONOMY

Packaging materials

Paper, cardboard and plastic are the main packaging materials used, with plastic accounting for about 11% of total consumption that reached 642 t, including all logistic processes. Initiatives are in place to reduce the use of packaging materials allowing at the same time for the safe transportation of products and to move towards sustainable alternatives to cover the relevant needs.

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 2022, amounted to 136,825 m³ (about 12.8 m³ per employee), showing a decrease of 16% compared to 2021.
- 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 11,118 m³ of wastewater, of which about 76% is reused for irrigation purposes.

No planned or unplanned water discharges to the environment as well as no significant spills occurred during 2022.

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 2022, about 195,500 end devices were refurbished, while about 99,000 devices were recycled. Avoided GHG emissions are estimated at 6 kt CO₂ eq, while avoided plastic use is about 31 t.

Shops & Sustainable Development

OTE Group reduces its environmental impact and demonstrates its commitment to sustainability by focusing on materials, resource efficiency and social responsibility in its shops. To achieve these objectives, the Group has in place initiatives for: a. Shops & Resources, b. Products & Circularity, and c. Social Responsibility.

SHOPS & SUSTAINABLE DEVELOPMENT



SHOPS & RESOURCES

OTE Group use sustainable and organic materials for all new or renovated shops. The flooring is eco-certified, made from renewable and environmentally friendly materials. Green walls and vertical gardens are integrated, which not only provide an aesthetically pleasing look but also contribute to the shops' biophilic design. Employees' clothing is made from sustainable fabrics and fair production. Shopping bags are FSC Mix-certified, meaning that are made from materials sourced from responsibly managed forests and recycled paper. There is use of recyclable LED lights, energy-saving LCD screens and the 100% of electricity is green.



PRODUCTS & CIRCULARITY

All the new and renovated shops are designed to promote the circular economy and encourage sustainable consumption. Special recycling bins have been installed which encourage our customers to recycle their devices. OTE Group select products that are designed for durability, reparability and reuse, also offering repair service in store, extending the product's lifetime. There are take back programs for old devices, ensuring that the old devices are properly recycled or repurposed. Eco-friendly packaging materials are used, in order to minimize packaging waste. Paper waste is reduced by using paperless receipts or offering digital receipts.



SOCIAL RESPONSIBILITY

All the new or renovated shops are designed with accessibility in mind, ensuring that they are physically accessible to persons with disabilities. This include providing ramp access, wide entrances, and wide aisles to accommodate wheelchair users and individuals with mobility issues. Additionally, the shops provide assistive technology to help persons with visual or hearing impairments. Charging stations for portable devices are also provided offering several benefits to customers and contributing to a positive shopping experience.

1. ENVIRONMENT | 1.3 CIRCULAR ECONOMY

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).

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.

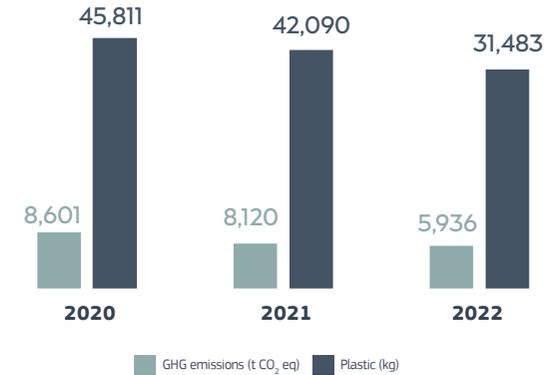
A take-back scheme is implemented in the Group retail network (for phones and accessories, tablets, home batteries and ink cartridges) to facilitate the recycling of mobile devices sold / leased at the end of their useful lifetime. **In 2022, about 25 t of**

mobile devices were collected and forwarded for recycling, of which 21.4 t in Greece (about 155,000 mobile devices).

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 2022, the program covers 25 office buildings nationwide, serving approximately 9,000 employees. Recycled quantities include 101 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](#).

END DEVICES REFURBISHMENT
ENVIRONMENTAL IMPACT



SUSTAINABLE
WASTE MANAGEMENT TARGETS



ZERO

ICT WASTE*
TO LANDFILL

~400,000

MOBILE DEVICES** TAKE-BACK
FOR THE PERIOD 2022-2024 (GREECE)

* 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

WASTE MANAGEMENT 2022

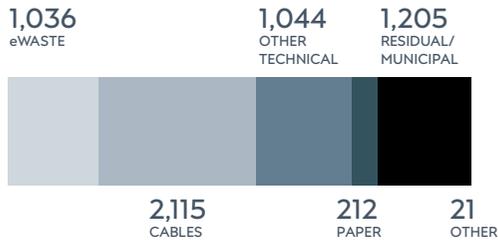
5,633t WASTE GENERATED
(GR: 89%, RO: 11%)

88% RECYCLED OR REUSED

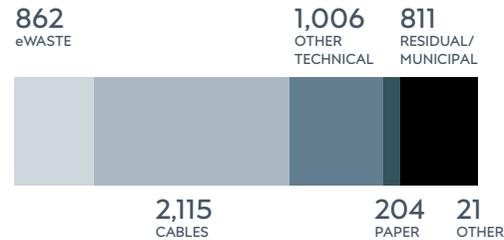
94% RECYCLED OR REUSED IN GREECE

0 ICT WASTE WAS LANDFILLED

OTE GROUP



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.). Technical waste are further disaggregated to eWaste (Waste Electrical & Electronic Equipment, WEEE), Cables and Other technical waste.

RESIDUAL/MUNICIPAL WASTE

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).

LANDFILL

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

CIRCULARITY FOR PRODUCTS & SERVICES RECYCLING AT OTE GROUP RETAIL NETWORK

Commitment: Circular economy is a key element of the transition towards a more efficient use of resources and climate neutrality. In acknowledging this, circular economy is one of the four priorities of the OTE Group Sustainability Strategy, and a holistic approach is applied that covers own operations, suppliers and customers. Ambitious targets have been set and concrete measures are designed and implemented to achieve them. Focusing on customers, OTE Group is committed to reach a take-back of approximately 400,000 mobile devices for the period 2022-2024 (Greece).

Since 2013, the company has been encouraging recycling at its retail network, where customers can bring phone devices with their accessories, tablets, household batteries and ink cartridges for recycling. Collected equipment is then processed for recycling through the authorized entities with which the Group cooperates. This would result in the minimization of the impacts on the environment, health and ecosystems from uncontrolled solid waste disposal, while raising public awareness.

By the end of 2022, collection points for recycling were in operation in more than 370 shops of the retail network, and in 25 office buildings in Greece. During the last two years €66,000 was invested in more than 4,200 recycling bins (including maintenance and replacement when necessary), which were subsequently placed in all collection points. 500 employees were involved in the operation of the recycling scheme. To support its operation a detailed management plan has been established for personnel training, raising public awareness, monitoring and record keeping as well as for the oversight of all necessary steps from collection to recycling.

The operation of the scheme has had a positive impact on energy and natural resources conservation, as mobile phones contain metals and plastics that when recycled save energy and resources that would otherwise be required to be mined and/or manufactured.

The above-mentioned recycled quantities of mobile phones contain, indicatively, 87.5 kg silver, 8.5 kg gold, 3,250 kg copper and 5 kg palladium, making them an “urban mine” for metal recovery.

Mobile devices contain hazardous substances that if not managed appropriately can contaminate soil and drinking water.

The recycling of home appliances batteries prevented the pollution of about 612 million m³ of water resources, while an energy conservation of 36,100 lt diesel is attributed to the recycling of ink cartridges.



COLLECTED & RECYCLED IN 2022

>25t
OF MOBILE DEVICES

~20.4t
OF HOME APPLIANCES BATTERIES

4,885
UNITS OF INK CARTRIDGES

Key Targets

12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.

12.6 Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle

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.

In this, a series of actions are in place to ensure compliance with EMF safety limits and foster safety in local communities while supporting them by offering competitive compensation for base stations' installation. Incidents are carefully addressed to avoid contributing to EMF "pollution" and any potential impact as well as causing visual nuisance and unrest/protests to the surrounding (to base stations') local communities.

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 2022, 248 measurement stations were in operation (two additional measurement station were implemented in 2022), while about 95 million measurements have been conducted since the beginning of the program. 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 (5 measurements), 17 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.

To improve outreach, an email address for questions regarding electromagnetic fields information is available (emfinfo@cosmote.gr).

Activities in Romania

In 2022, there were 5 EMF measurements performed by ANCOM (National Authority for Management and Regulation in Communications) on Telekom Romania 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 2022 is equivalent to GHG emissions of about 8 kt CO₂ eq (down by 12% compared to 2021). These emissions account for about 34% 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. Increasing land use by human activities is one of the causes of biodiversity loss. Land use requirements for telecom companies are lower compared to other economic activities, though 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 addition, activities across the value chain may have an impact on biodiversity.

OTE Group addresses biodiversity preservation across its value chain, to the extent possible, through:

- The OTE Group Supplier Code of Conduct, according to which the suppliers shall take a precautionary approach towards environmental challenges, including biodiversity. The Code also sets the

framework for social, environmental and compliance audits.

- The design, installation and operation of telecom installations in compliance with the approved environmental terms of operation that aim to minimize any associated potential environmental impact.

Lake Stymfalia, Natura 2000 site in Peloponnese



QUANTITIES OF REFRIGERANTS REPLENISHED (KG)

	2020	2021	2022
R407C (kg)	3,776.80	3,768.50	3,008.76
R410A (kg)	818.40	736.50	1,334.10
R134a (kg)	280.00	144.00	23.30
R417A (kg)	921.70	627.50	613.71
R422D (kg)	40.50	-	-

1. ENVIRONMENT | 1.5 OTHER ENVIRONMENTAL ASPECTS

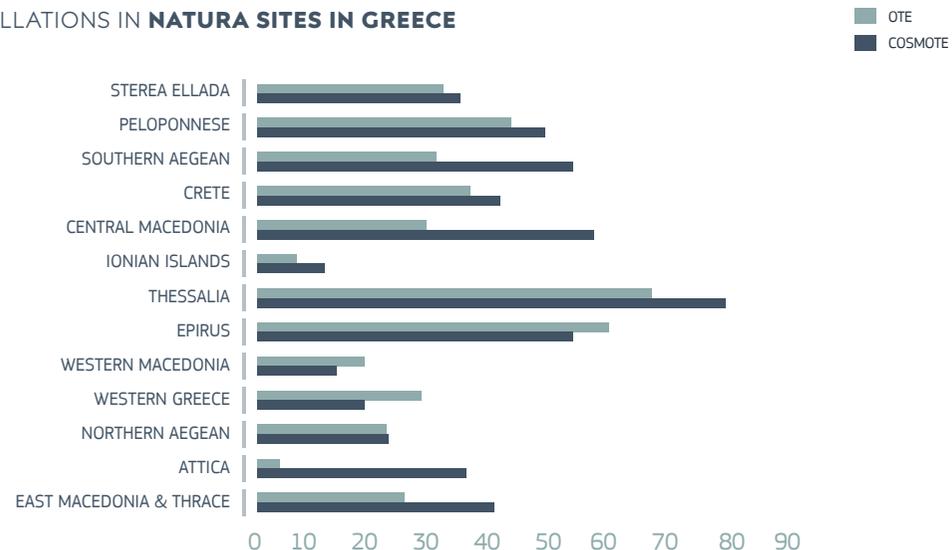
- The climate change strategy in place, as climate change has a high impact on ecosystems and biodiversity.
- The policy on circular economy, in the context of which the lifetime of end devices is extended, the use of natural resources is reduced, and valuable materials are returning back to the market through recycling.
- The development of ICT solutions that can have a positive impact on biodiversity preservation, such as those implemented in the context of the LIFE Safe-Crossing project.

In Greece, in 2022 there were 540 COSMOTE base stations and 413 OTE base stations installed in 198 and 141 Natura sites, covering areas of 23.3 and 22.4

hectares, respectively. In Romania there were 34 base stations in Natura sites, covering an area of 0.96 hectares (2022). 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.

INSTALLATIONS IN NATURA SITES IN GREECE



ICT SERVICES FOR BIODIVERSITY: THE LIFE SAFE-CROSSING PROJECT

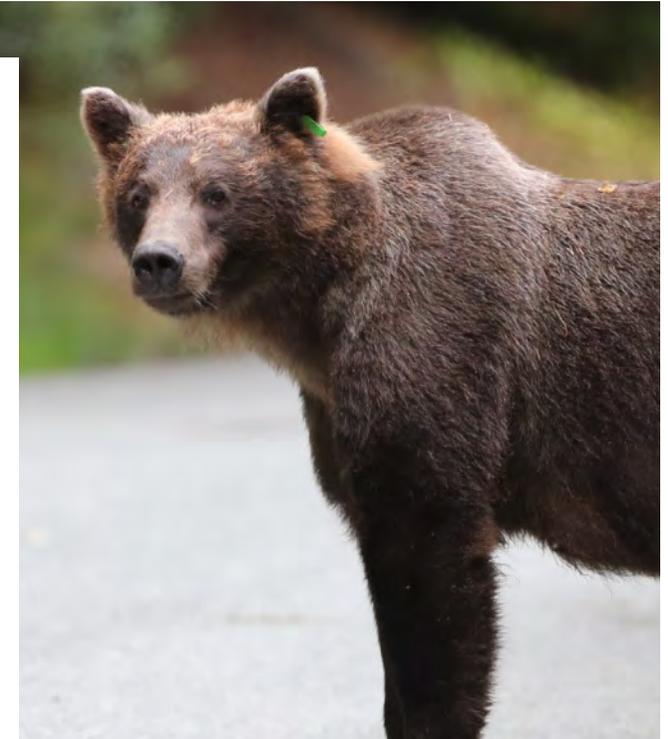
LIFE SAFE-CROSSING

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 percent reduction in vehicle speeds and a 50 percent 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:

- (a) species recognition and categorization using Artificial Intelligence techniques,
- (b) creation of animal-crossing statistics and
- (c) data visualization including underpass information, photos, videos, and statistics.



IN 2022, MORE THAN

30,000

PHOTOS AND VIDEOS
WERE COLLECTED

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.

Since mid-2021 (and up to mid-2022), the interventions planned were carried out (e.g., 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) and as a result new multimedia material was not generated. Since mid-2022 and by the end of 2022, more than 30,000 new photos and videos were collected. The analysis of the material collected is expected to finalize by the end of June 2023 and a final

evaluation will be made on the effectiveness of interventions and the improvements on the living conditions of the wild fauna in the area.

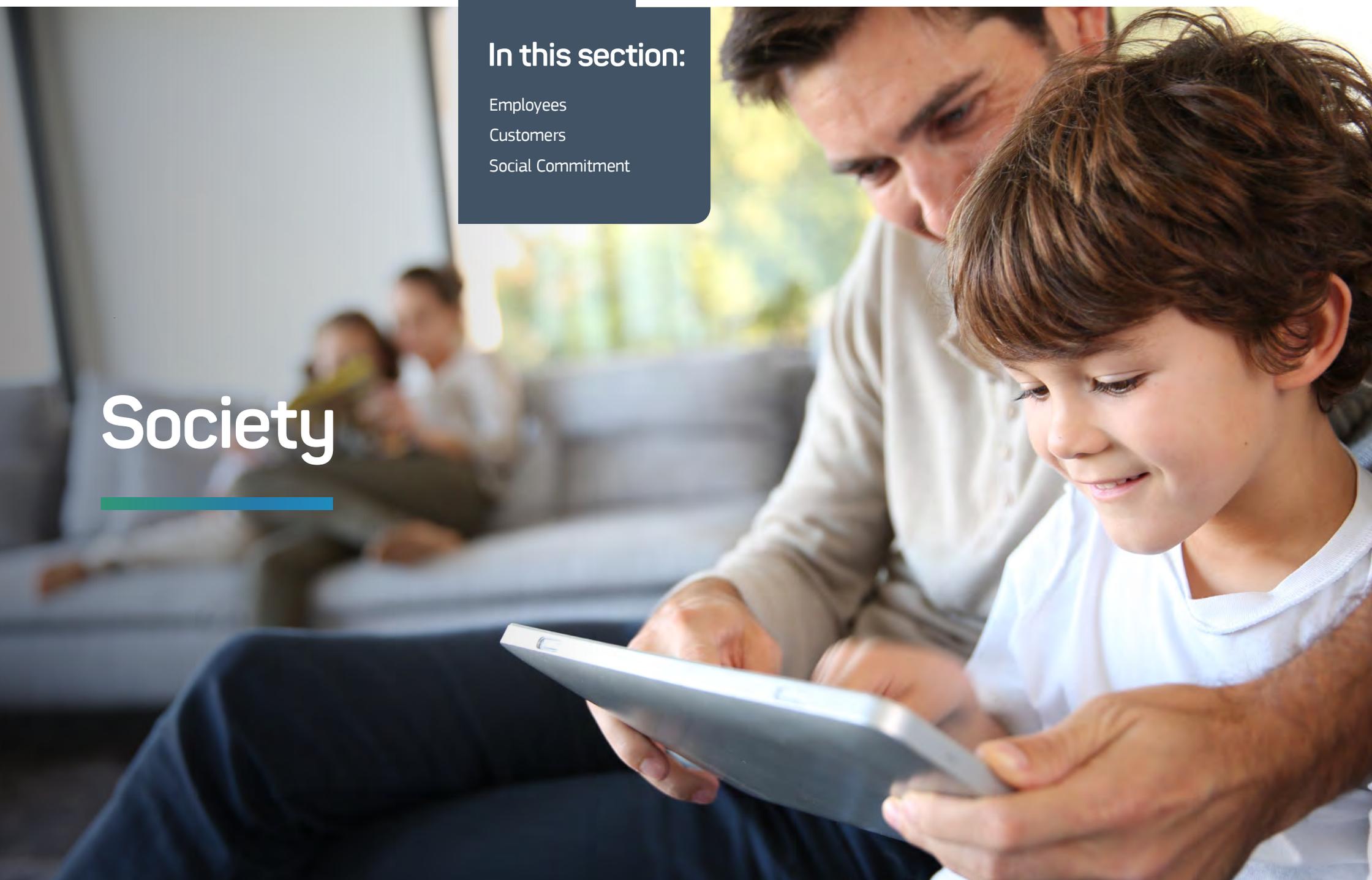
Thirteen (13) partners drawn from NGOs, private companies, and public bodies in four countries (Italy, Greece, Spain, and Romania) are participating in the LIFE SAFE-CROSSING project that will be running until August 2023.



In this section:

- Employees
- Customers
- Social Commitment

Society



- 2.1.1 Human Resources Management
- 2.1.2 Employment
- 2.1.3 Fair Employment and Equal Opportunities
- 2.1.4 Health and Safety
- 2.1.5 Employee Selecting, Attracting and Retaining
- 2.1.6 Employee Training and Skills Development
- 2.1.7 Employee Communication, Engagement and Satisfaction

Employees

41%

OF EMPLOYEES
ARE WOMEN

97%

OF EMPLOYEES ARE
COVERED BY COLLECTIVE
LABOR AGREEMENTS

124,516

TRAINING HOURS



2.1.1 HUMAN RESOURCES MANAGEMENT



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

OTE Group recognizes and endorses efficient performance and quality of work, while fostering a culture of continuous personal and professional growth.

This is achieved by offering equal and unlimited opportunities to employees and by utilizing technology as a tool to upgrade the educational resources available, as well as the impact on the employees training and expertise.

In this context, OTE Group invests in digital tools to enhance the skills and improve the digital literacy of its employees, encourages collaboration, promotes open communication and innovation, and finally, following the quickly evolving modern norms, adopts new working models (remote, agile, etc.) to best serve its employees.

For OTE Group, the aim to support an equitable society and uphold the values of Diversity, Equity, and Inclusion, provide the foundation for the Group's Human Resources policies and actions, which contribute to the company's vision to create a better world for all.

2.1 EMPLOYEES | 2.1.1 HUMAN RESOURCES MANAGEMENT

Through the **Diversity, Equity and Inclusion Policy**, established in 2021, OTE Group ensures the holistic and integrated management of diversity and the provision of equal opportunities towards all employees. With this Policy, OTE Group has committed to at least 30% women at top and senior managers' positions (Directors, Ex. Directors, Chief Officers) by 2024. All the procedures, initiatives and actions towards the achievement of a diverse, equitable and inclusive environment are aligned with OTE Group's strategy and corporate culture aiming to incorporate diversity into the core business model and the day-to-day operations.

The first and foremost priority for OTE Group is to protect its employees and their families, its partners and customers, especially when a disruption of any kind emerges, such as the COVID-19 pandemic, and the adaption to changing conditions, while ensuring business continuity and compliance with appropriate safety measures in place. In the midst of the financial and social difficulties that arose during the third year of the COVID-19 pandemic and with a high sense of responsibility towards society and its people, in 2022, OTE Group implemented a coordinated plan, for the new post-pandemic circumstances in alignment with the relevant national guidelines.

In 2022, Human Resources' (HR) digital tools and systems were further upgraded to incorporate new OTE Group subsidiaries and DT Group companies, while new advanced functionalities were introduced. This includes the Team & Peer Feedback developmental tool, which was modified to effectively support the demands of the new legal framework related to the Digital Employee Card. The use of robotic process automation (RPA) was extended to new HR processes, which enabled the performance of high-volume repetitive tasks with minimum risk.

Furthermore, in 2022, the People Analytics platform was enhanced with new dashboards and KPIs, offering a valuable overview of HR data and supporting the decision making of the management and the HR Department.

Even before the outburst of the COVID-19 pandemic, OTE Group had already set the basis for virtual collaboration and communication between cross functional teams, and all digital channels and platforms for communication, collaboration, work management and training (digital learnings) were upgraded and made available for all employees, both when working from home and office.



OTE GROUP ENSURES THE HOLISTIC AND INTEGRATED MANAGEMENT OF DIVERSITY AND THE PROVISION OF EQUAL OPPORTUNITIES TOWARDS ALL EMPLOYEES.



2.1 EMPLOYEES | 2.1.1 HUMAN RESOURCES MANAGEMENT

Furthermore, a series of job rotation programs were implemented in 2022, encouraging OTE Group employees who have showcased great growth potential, to take on 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, collaborate with different groups of people, experience a variety of work environments, as well as develop new skills through the use of practices, tools and tasks in order to grow personally and professionally. In addition, a total of 396 job rotations took place in 2022.

Operational Framework

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

The framework setting out the responsibilities and duties for the Business Unit of the Group’s Chief Human Resources Officer, which is a member of the Group’s Management Team includes:

- **HR Competency Centers:**
 - Compensation and Benefits, HR Controlling, Organizational Effectiveness
 - HRD: 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.

Organizational Transformation and Effectiveness

Amid a continuously changing market and business environment, OTE Group prioritizes and focuses on an optimized operating model and organizational structure to secure modern, customer-oriented and effective business practices.

After the successful spin-off implementation for Call Centers, Shops and Field Technicians, in December 2022, the spin-off of CREM (real estate management and facility services) to the autonomous OTE Group subsidiary OTE Estate (100%) has been successfully completed, aiming at higher flexibility in the competitive real estate environment.

Furthermore, the acquisition of OTE GLOBE, a 100% subsidiary of OTE S.A., by its parent company was in progress throughout 2022 and the merger was completed on January 2, 2023, aiming at:

- The simplification of OTE Group portfolio and operations, through the consolidation of all wholesale activities within the same entity and the elimination of the intercompany agreements and transactions, as well as the reinforcement of OTE Group’s competitiveness in the International Wholesale business.
- The reduction of the operational cost by means of utilization of OTE S.A. supporting functions.
- The improved end-to-end management and monitoring of customers’ broadband experience, given that OTE GLOBE was responsible for providing international internet connectivity/service to OTE/COSMOTE retail broadband customers.

In addition to these changes and aiming to establish a simple and flexible organizational model, in November 2022 the agile organization concept was implemented within the IT and Marketing Departments, with the creation of two Tribes. Another 12 Tribes/Centers of Excellence (CoEs) have been identified in the areas of B2C, B2B, IT and NT,

and are under preparation, in order to be launched within 2023.

Recognizing the importance of embedding modern and effective working practices, two of OTE Group’s largest subsidiaries, COSMOTE e-Value and CTS, have radically reformed their operating model, in order to provide more flexible ways of working and faster responses to customers and offer more developmental opportunities for its people.

Additionally, within 2022, the preparation of an intensive restructuring towards a more clear-cut and flexible organization began, across all Group’s functions and Business Units, affecting almost 500 managerial positions. Managers with critical know-how, experience and good performance will now be considered a part of the Professional/ Expert management level. OTE Group provided all necessary communication and clarification to its employees, to ensure a smooth transition to the new structure at the beginning of 2023.

Job Family Model (JFM) further expansion

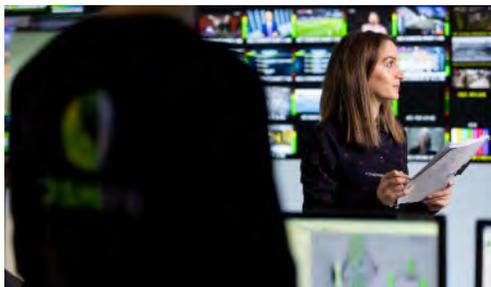
OTE group adapts to the rapid changes of the business environment, by taking advantage of modern challenges, optimizing the operating model and implementing new

2.1 EMPLOYEES | 2.1.1 HUMAN RESOURCES MANAGEMENT

trends into the organizational structure.

The Job Family Model (JFM) was introduced and applied to additional OTE Group subsidiaries, such as COSMOTE Payments and OTE Estate. The Executives were informed of the concept and functionalities of the Model, while employees were allocated to their respective role and one-to-one communication roll-out has been completed.

The Job Family Model is a valuable tool that serves as the backbone for the changes in the operating model of COSMOTE e-Value and CTS, as well as the CREM spin-off for OTE Estate.



OTE GROUP CONSIDERS FLEXIBILITY AND ADAPTABILITY AS INTEGRAL ELEMENTS OF ITS CORPORATE CULTURE AND ADOPTS AN AGILE ORGANIZATIONAL STRUCTURE.

called THE GRID. It aims to welcome OTE Group and its stakeholders to a new era.

THE GRID: New era of agile structures in OTE Group

In order to follow the continuously evolving social and economic landscape and to remain competitive, OTE Group considers flexibility and adaptability as integral elements of its corporate culture and adopts an agile organizational structure.

OTE Group's new agile organization structure serves the following vision and goal: "To be the leading digital provider, creating growth and providing an excellent customer experience, a true love brand for customers and employees".

The agile structure is mainly applied to the units that deal with the development of products and services and are at the forefront of the customer experience. Both organizational structures, the existing and the agile, are equally important and necessary to achieve the Group's goal.

The agile transformation journey began in 2020, by initially creating two pilot tribes: What's Up Tribe and Digital CX Tribe. Having already built a foundation, and through the experience gained from the two pilot Tribes, in 2022, OTE Group was able to accelerate the transition towards a more agile model.

Following a product-based approach, the new Tribes created in November 2022, are related to product and technology development. Thus, in 2022, two new Tribes were created, one from Commercial and one from IT (B2C Mobile & Household and IT DigiTech) community, including 10 agile teams (Squads). The new teams include employees from Marketing, IT, Technology and Customer Operations. The goal for 2023, is the integration of additional teams from different functions of the Group to the agile organization structure.

The agile structure development project is

OTE Group HR Consulting Services within DT Group – A Success Story

OTE Group has undertaken the provision of HR Services within DT Group and, in particular, DT Cloud Services EPE (DTCS) in Greece, since 2017. The provided services focus on all HR issues (Administrative and Consulting), including support with the customized SAP system of the OTE Group "SmartHR".

In March 2022, the DT Management Board decided to relocate DT IT Russia's employees to other European countries. The aim was to create a new DT IT HUB in

2.1 EMPLOYEES | 2.1.1 HUMAN RESOURCES MANAGEMENT

Thessaloniki, in Northern Greece. As a result, more than 450 employees selected Greece as their new country of residence together with their family members. The relocation of approximately 750 people was to be completed by 30/6/2022, within a period of around 3.5 months, in order for the relocated employees to acquire favorable tax regime. The process involved the coordination of a variety of actions that entailed not only OTE Group’s HR Team, but also the contribution of various governmental institutions with complex and bureaucratic processes, given that it involved citizens outside the EU. The project was successfully implemented within the requested time frame by the experienced and skilled OTE Group HR Team.

The new DT IT HUB is considered a success story for DT Group and will surely be used as a future reference to best practices within the Group.

Diversity, Equity and Inclusion (DE&I) in OTE Group

OTE Group approaches the issue of diversity, equity, and inclusion holistically. To this end, the policies and actions it designs and implements, during the last 3 years, touch on all aspects of employees’ daily lives: embedding diversity in all labour practices

2022 HR AWARDS & DISTINCTIONS

OTE Group companies received a total of 15 awards & distinctions in 2022, reflecting their high level of performance in human resources issues. The awards were presented by leading institutions and organizations in Greece, which evaluate and reward achievements and best human resources practices. The topics awarded cover a wide range of human resources management issues, from training & development, to health & safety and DE&I.

Be-flexi
HR AWARDS: MOST EFFECTIVE TOTAL REWARD STRATEGY | SILVER

you.grow
HR AWARDS: MOST EFFECTIVE TALENT RETENTION INITIATIVES | GOLD

BRAVO SUSTAINABILITY DIALOGUE & AWARDS: DISTINCTION IN THE CATEGORY” EDUCATION - LIFELONG LEARNING | SOCIETY

OTE Group Future Skilling Academies
HR AWARDS: MOST EFFECTIVE UPSKILLING AND RESKILLING INITIATIVES | SILVER

KPMG | Fortune Greece
 2nd MOST ADMIRE COMPANY IN GREECE

#asto_pano_mou
HR AWARDS: LEARNING & DEVELOPMENT | PLATINUM

HR AWARDS: BEST CHANGE MANAGEMENT STRATEGY | GOLD

2021 EUROPEAN CONTACT CENTER & CUSTOMER SERVICES AWARDS | GOLD

H&S Roadmap for “Living Better”

HR AWARDS: HEALTH & WELL-BEING | PLATINUM

HR AWARDS: EXCELLENCE IN WORKPLACE WELL-BEING | GOLD

HR AWARDS: COVID-19 - LIVING WITH THE PANDEMIC BEST CRISIS MANAGEMENT STRATEGY | BRONZE

HEALTH & SAFETY AWARDS: HEALTH & WELLNESS INITIATIVES | GOLD
 BEHAVIORAL RISK INITIATIVE | GOLD
 H&S IN TELECOMMUNICATIONS | WINNER

Diversity @OTE Group

HELLENIC RESPONSIBLE BUSINESS AWARDS: DIVERSITY, INCLUSIVENESS, EQUAL OPPORTUNITIES | BRONZE



(recruitment, remuneration, leave, etc.), creating of a formal DE&I policy, adopting of initiatives aimed at further promoting diversity in the company (Mentoring Program), strengthening awareness and knowledge (through e-learnings, digital events, communication campaigns), and receiving feedback to plan the next actions but also to proceed, if necessary, with corrective ones.

The employees’ response to the promotion of diversity is considered very positive. At the beginning of 2022, a new chapter with seminars on the enhancement of diversity

and the elimination of unconscious bias, was included in the educational resource list for employees. In addition, two new questions were added to the employee satisfaction survey, carried out throughout the Group twice a year, in order to receive feedback from employees on the provision of equal opportunities, as well as the existence of a safe and supportive working environment. Furthermore, in 2022, a short quiz was conducted through the corporate Intranet to increase employee awareness and knowledge, with 2,155 employee participations, who responded that they are

familiar with the principles and the concept of DE&I.

OTE Group commits and invests in DE&I, by offering equal opportunities, promoting diversity and anti-discrimination in the work environment, as well as increasing satisfaction of employees. The Group’s vision is to continuously evolve to better match the employees’ expectations and contribute to the development of an inclusive and fair society, which does not exclude anyone, neither in the digital nor in the physical world.

2.1.2 EMPLOYMENT

On December 31st, 2022, the number of OTE Group employees was 10,714¹.

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

Women constitute 41% of the Group's employees. CTS and Telekom Romania Mobile Communications employ a large number of technical personnel, the majority of whom are men.

Always prioritizing the improvement of the employee experience, in 2022, OTE Group remodeled and enhanced 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 2022, voluntary exit programs with financial incentives were adopted in a number of OTE Group companies in Greece, aiming at the enhanced rationalization of human resources and respective labor costs. In total, 340 employees in Greece, applied for the scheme and accepted the incentives offered, which were designed in a socially responsible manner. Overall, in 2022, 317 employees left the Group.

SIGNIFICANT DATA 2022

10,714
EMPLOYED AT OTE GROUP



6% VOLUNTARY TURNOVER RATE



1% INVOLUNTARY TURNOVER RATE

GREECE SIGNIFICANT DATA 2022

9,835 EMPLOYEES 39% WOMEN

99.5% WITH DEPENDENT EMPLOYMENT ON INDETERMINATE PERIOD OF TIME CONTRACTS 76% BETWEEN 31 AND 50 YEARS OLD

170 RECRUITMENTS (EXCL. WITHIN OTE GROUP) 612 DEPARTURES (INCL. VOLUNTARY EXIT SCHEMES)

ROMANIA SIGNIFICANT DATA 2022

879 EMPLOYEES 63% WOMEN

99% WITH DEPENDENT EMPLOYMENT ON INDETERMINATE PERIOD OF TIME CONTRACTS 80% BETWEEN 31 AND 50 YEARS OLD

64 RECRUITMENTS 169 DEPARTURES

RECRUITMENTS

413 EMPLOYEES 40% WOMEN 25% UNDER 30 YEARS OLD 43% EMPLOYED INTERNALLY WITHIN OTE GROUP

DEPARTURES

781 EMPLOYEES 29% OVER 51 YEARS OLD 41% THROUGH VOLUNTARY EXIT SCHEMES

¹ OTE Group HR information 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 AND EQUAL OPPORTUNITIES



WHY IT MATTERS

OTE Group 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 employees.



Recognizing that poor labour practices can increase the negative impact of OTE Group and can lead to the violation of individual rights, the discrimination or harassment of employees, the Group works towards promoting a healthy and decent working environment throughout its operations. The respect of labour rights, the promotion of diversity and equality and the provision of benefits make up part of the foundations of OTE Group. This foundation contributes not only to a positive corporate culture, but also to the overall prosperity of society and the respect of human rights. Through decent work environment, the Group can achieve increased positive impact, reduced inequalities, high employee satisfaction and

improved living conditions of employees. The OTE Group Fair Employment Framework 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**.

In 2021, OTE Group adopted the Diversity, Equity and Inclusion (DE&I) Policy for all

Group employees, delivering on the commitment of creating a corporate culture that will embrace and promote the values of Diversity, Equality and Inclusion. The **DE&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.

The companies' induction programs for new employees include a separate section on Compliance issues, on the Code of Ethics, Sustainability, 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 ones until December 31st, 2022 were signed.

97%

OF OTE GROUP EMPLOYEES ARE COVERED BY COLLECTIVE LABOR AGREEMENTS

2.1 EMPLOYEES | 2.1.3 FAIR EMPLOYMENT AND EQUAL OPPORTUNITIES

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. The terms of the two collective agreements remained in force until 31/3/2023.

Moreover, in March 2023, two new three-year Collective Labor Agreements of OTE and COSMOTE employees, were signed, bringing additional benefits, since all the employees will see an improvement in their income. The new Collective Labor Agreements lay the foundations for a modern pay and benefits framework that is beneficial for all OTE and COSMOTE employees.

In particular, with the new Agreements:

- A modern and uniform remuneration framework is provided in line with the role of each employee. The starting salary of the new salary categories exceeds the current statutory salary by up to 54%.
- The salaries of low-wage employees are increased by an average of 12%, in line with the company's strategy with regard to boosting the income of young people.

- A flexible “Be-Flexi” benefit package is introduced for all employees, amounting to €850 per year. Each employee chooses from the list of benefits offered by the company according to his/her needs.

- A Group Pension Plan for all employees is also introduced for the first time at OTE.

At the same time, the provision of coverage of expenses for childcare and nursery costs is maintained, and facilitation (special leaves, reduced working hours) is provided for parents, single-parent families, people with health problems, and people with disabilities.

Furthermore, 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 December 31st, 2023.

Similarly, a two-year Collective Labor Agreement of Telekom Romania Mobile Communications employees is valid for two years, from July 2022 until 15th of June 2024.

All signed agreements regulate payroll issues, leave, benefits, compensation, employees working hours, as well as health and safety issues.

In 2022, two strikes took place, regarding

general claims of Greek employees due to the national economic circumstances, lasting two days in total.

Combating Discrimination and Promoting Equal Opportunities and Diversity

The culture of inclusion and the absence of discrimination are the fundamental principles of the company's operation, as defined by the Group's Code of Conduct and Code of Human Rights and Social Principles. Reinforcing its position as an inclusive 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 mean 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.

Moreover, in 2021 OTE Group established its own DE&I 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 related to DE&I, available to all employees.



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

Non-discriminatory Compensation

The OTE Group does not support any form of gender discrimination in compensation policies.

Employees' salary is determined by the level of the position they hold, their level of education or role 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 until 31/3/2023, at €866.12 (31/12/2021), 21% higher than the national minimum wage in Greece (€713), at that time.

The pay gap between men and women based on the analysis at the same level of positions is very small. Overall, taking into

2.1 EMPLOYEES | 2.1.3 FAIR EMPLOYMENT AND EQUAL OPPORTUNITIES

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 4.5%.

At different management levels, the ratio varies between 1% to 5%, namely:

- Top management: 3.5% (CEO, Chief Officers, Executive Directors)
- Middle management: 5% (divisional heads of the Company, i.e. Directors)
- All other positions: 1%

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.

Employee Benefits

OTE Group considers its employees the most important asset and a key factor for the company’s prosperity, sustainability, and growth. Therefore, creating and providing a modern and sustainable working environment of high standards for its people, is a top priority for OTE Group. In this

context, the company provides them with a wide range of benefits, aiming to significantly upgrade their quality of life, while contributing to balancing their personal and professional needs and strengthening their family planning. At the same time, an appealing benefits scheme serves as a safe and efficient way to promote employees’ job satisfaction, and increase their loyalty to the company.

The existing benefits schemes vary per company within OTE Group, to better fit the different employees’ profiles and needs. They consist of the core benefits, available to all employees, such as medical and life insurance, mobile and fixed phone services, and optional or status benefits, based on the family profile and the business role of each employee. In November 2022, OTE Group implemented for the first time cafeteria benefits, which are available in two of the Group’s subsidiaries, CTS and GERMANOS.

OTE Group’s goal for the future, is to align the benefits for the employees of all Group companies.

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 higher, 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 Collective Labor Agreement of OTE and COSMOTE in force until 31/3/2023, 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.



2.1.4 HEALTH AND SAFETY



WHY IT MATTERS

For OTE Group, ensuring employees' health, safety and overall well-being, remains a key priority. In this direction, integrated practices and actions related to those issues are implemented every year, and are considered vital for the successful and sustainable future of the Group. This integration, along with the monitoring of daily issues, have a direct impact on employee's satisfaction, well-being, work quality and corporate culture.



OTE Group acknowledges the positive impact that health and safety culture can have, not only on the Group's operations, but also on its employees, customers, contractors, suppliers and business associates, as well as the society. With the promotion of safe working conditions and the implementation of health and wellness programs, the Group can eliminate fatalities and injuries, while supporting the mental health of its employees, better quality of life and respect of human rights. Unaddressed work-related incidents, injuries and risks could potentially increase the negative impact, through a high frequency of injuries, threatening the safety of employees, the

company's reputation and its compliance with relevant regulations.

Taking into consideration the current legislation, the management systems (ISO 45001:2018) in place and the international best practices, the Health and Safety Unit developed the "Live Better..." program. This is an annual program, which includes targeted and specific activities related to health, aiming to provide all necessary knowledge to the Group's employees to protect their health, adopt healthy daily habits and ensure their mental well-being. Furthermore, by taking advantage of the digital environment, employees and their

families can easily access the offerings of the program, regardless of their location and increase their participation in it. The program achieved:

- Positive results in the health and work-life balance performance indicators (mental well-being, emotional exhaustion/recovery, physical well-being, presenteeism), as derived from the employee satisfaction survey distributed within DT Group.
- Adoption of healthy daily habits and strong physical condition of employees, resulting in positive overall experience of the program, as employees mentioned in the health and safety survey.

Additionally, with the aim to further promote the mental health of all employees, OTE Group enhanced the existing psychological support and enriched the 24-hour hotline. Through these initiatives, the Group provides support related to violence and harassment incidents, by offering guidance on how to deal with disrespectful or violent behavior in the workplace or at home, while also raising awareness regarding the respect of human rights.

In relation to safety, the Group has established robust policies, procedures and systems that identify and prevent workplace injuries and occupational diseases.

Health and Safety Policy

OTE Group's Health and Safety Policy aims to assure 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 stores, field technicians, climbers, employees in warehouses, offices, Call Centers, e.tc.).

Prevention of accidents in the workplace, assessment of occupational risk, prompt response to emergency cases and

2.1 EMPLOYEES | 2.1.4 HEALTH AND SAFETY

continuous trainings for the employees are fundamental for the preparedness of Health and Safety in the Company. The technical and medical inspections, which are conducted on an every-day frequency, contribute to this effort.

The identification of risks arising in the workplace, are reported in the Occupational Risk Assessment by Safety Engineers and Occupational Physicians, according to the requirements of Greek legislation. The Occupational Risk Assessment file is included in a systematic process. This process aims to identify the sources of risk and determine 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 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 safety trainings and awareness programs on a regular basis, to ensure the correct use of PPE.

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 the Health and Safety Unit to relevant authorities within 24 hours, via submission of an accident report form.
- Collection of medical history of the 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 specific case to a digital file that lists workplace accidents per year.
- Inspections of the accident's place and conditions from the Safety Engineer, who

submits a report that describes the situation, as well as propose preventive measures and good practices for the avoidance of similar incidents in future. Meanwhile, the responsible Occupational Physician examines the "suffering" employee and evaluates their ability to continue their 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 employees' needs, in particular with regards to the configuration of jobs' description or the choice of equipment.

It should be emphasized that if an employee considers a pending risk while conducting a work-related task, they are granted the discretion to pause their work and call the supervisor and/or Safety Engineer, without any repercussions inflicted on the employee's performance.



2.1 EMPLOYEES | 2.1.4 HEALTH AND SAFETY

Furthermore, OTE Group health services proactively support the improvement of the working environment, taking into consideration 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 the relevant accident-prevention issues, on a regular basis, and respond to any kind of emergencies that may occur. In addition, the medical team implements multiple wellbeing programs aimed towards preventing and promoting the health of employees or even targeted groups of employees as needed.

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' capability 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 teams with regular evacuation drills.
- Implementing the hygiene standards model (HACCP) on all employees' dining areas and managing 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 the development and review of processes, stay 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 AND SAFETY AWARDS 2022



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

WINNER OF TELECOMMUNICATION

in **Companies and Organizations** category of Health & Safety Awards 2022

PLATINUM AWARD

in **Health & Well-Being** category of HR Awards 2022

THREE GOLD AWARDS

in **Excellence in Workplace Well-being** category of HR Awards 2022 and in **“Health & Wellness Initiatives”** and **“Behavioral Risk Initiatives”** in Health & Wellbeing Activities category of Health & Safety Awards 2022

BRONZE AWARD

in **Best Crisis Management Strategy** category of HR Awards 2022

Health and Safety Performance

In 2022, there were no fatal work accidents.

In order to prevent workplace accidents, OTE Group ensures that technical staff is well trained on the use of PPE, provided by the company. All PPE used is certified to meet all relevant and appropriate standards.

Moreover, OTE Group continuously conducts

trainings, in order to raise awareness among technical staff (e.g. webinars for working safely at heights while using ladders).

2.1 EMPLOYEES | 2.1.4 HEALTH AND SAFETY



Health Promotion Initiatives

In 2022, with the return to normality after the COVID-19 pandemic restrictions, the Health and Safety Unit implemented new health-related initiatives, specifically focused on frontline people, such as:

- Health Day events in 18 premises nationwide.
- Vaccination program to prevent seasonal influenza in 313 facilities.
- First aid seminars (over 400 employees trained).
- Awareness Webinars focused on empowerment, self-care and balance in daily life (e.g., emotions management,

hypertension, menopause).

- Enrichment of existing sports activities with new ones (e.g., padel).

Furthermore, with responsibility towards society and people, OTE Group’s long-established voluntary blood donation program continued in 2022, in collaboration with KEDMOP (Center for Information and Attracting Volunteer Bone Marrow Donors) for the registration of volunteers.

All actions were implemented either with physical presence –in several cities of Greece– and/or digitally. All employees had the opportunity to get in touch with

specialized partners to ask about health and well-being concerns and receive recommendations, for themselves and their families.

Awareness and Prevention

“Live better...” is OTE Group’s long standing health, safety and wellness program, which provides a variety of actions and events for employees every year.

This year, the awareness action plan focused on the promotion of employees’ wellness, by raising awareness and supporting self-care culture in daily life. Indicative actions of this year’s “Live better...” program include:

- **Health Days** targeted in physical and mental health. Employees had the opportunity to visit booths, each one dedicated to an issue related to:
 - **Physical Health**, where Medical Checkup was carried out by a medical team, (live measurements of sugar, cholesterol, and blood pressure) and examination by a cardiologist (electrocardiogram) aiming at evaluating the cardiovascular risk.
 - **Mental Health**, where counseling guidance was provided by OTE Group psychologists team on issues that may concern employees or any member of their family, such as resilience, self-care.
 - **Wellness in daily life**, where guidance from a specialized psychologist, was provided on the benefits of quality sleep. At the same time, brief neck massage sessions were carried out by specialized physiotherapists and advice was provided by a Nutritionist performing a lipometry or oxidative stress measurement, according to the needs of each employee.
 - In addition, **Work Safety** short trainings were carried out (in technical departments and other facilities) for safe work at height, for use of ladders, as well as for fire safety.

2.1 EMPLOYEES | 2.1.4 HEALTH AND SAFETY



- **Asthma checkups**, conducted by expert pneumonologist via personalized sessions in 7 premises nationwide, on occasion of the celebration of World Asthma Day.
- **Osteoporosis checkups** and evaluation of bone density results from experts, aiming to inform about prevention and treatment.
- **Webinars for the promotion of health in daily life and handling specialized health issues** (topics related to hypertension, menopause, breast cancer).
- **“Stop smoking” call-to-action**, via encouraging employees’ contact with specialized advisors of NEXT TO YOU 24hour hotline about their psychological empowerment for continuing of not smoking.
- **Actions targeted in dealing with emergency situations** such as First Aid trainings and Fire Extinguishing - Evacuation and Rescue Techniques.
- To raise employee’s awareness against the **COVID-19 spread** and the **Monkey Pox epidemic**, two live webinars were conducted by an infectious disease expert physician, using the updated per period health data.

In 2022, the **supply of personal protective equipment** against COVID-19 continued as needed, along with the provision of COVID-19 PCR (Polymerase Chain Reaction)/ Rapid Tests at work. Furthermore, OTE Group continued to offer preferential prices to employees and their families for PCR tests, in cooperation with specific diagnostic centers.

2.1 EMPLOYEES | 2.1.4 HEALTH AND SAFETY



TRAINING ON SAFETY ISSUES



3,990 employee participations in **safety training programs** which were carried out in 2022:

- Work with safety at height – Use of portable ladders - Webinars.
- Training program for work at height 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, earthquake preparedness, 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**, in topics such as:

- "Resilience" and "Emotion management", aimed at well-being, self-improvement and maintaining work-life balance
- "Behavioral Risk Assessment", aimed at the identification and management of deviant behavior in workplace.
- "Violence and harassment", aimed at raising advocacy and protecting of human rights (raising awareness on how to deal with such behaviors both in work and domestic environment).

• Over **1,130** 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** conducted by specialized nutritionists and psychologists for all employees nationwide focusing on better nutrition and healthy eating habits.
- **Team sport activities:** 5x5 football, basketball, volleyball, tennis games, running team and outdoor training. In 2022, a new sport called padel was added to the team sport activities.
- **Indoor activities** such as the provision of a Gym in OTE Group's Paiania premises and mild physical exercise training groups in central premises via personal e-booking reservation.

2.1.5 EMPLOYEE SELECTING, ATTRACTING AND RETAINING



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 DE&I Policy introduced KPIs for diverse gender candidates of all managerial roles. More specifically, the gender quota to be achieved within three years from the adoption of the Policy in 2021, is 25% of Board members and 30% of Top and Senior Managers to be women respectively.

The Group systematically and strategically creates positive impact to its employees, not only by ensuring the provision of best labour practices, but also by establishing a healthy working environment, where employees feel safe, confident and satisfied. The Group works towards establishing a transparent recruitment process, with equal treatment and respect towards all candidates. Furthermore, the continuous investment in personal and professional growth along with the performance evaluation, can contribute to the development of a solid career path for all OTE Group's employees, achieving high retention rates and good brand reputation. In this way, the Group eliminates the potential negative impact associated with poor employee management practices, increasing its positive effect on its employees, the local job market, the youth employment rates and the society.

2.1 EMPLOYEES | 2.1.5 EMPLOYEE SELECTING, ATTRACTING AND RETAINING

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 OTE Group companies conduct an annual performance evaluation of employees on all hierarchical levels. The performance management system, which enables employees to achieve high performance and continuous development, 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.

Employees moving into positions of

managerial responsibility for the first time, undergo dedicated training on how to evaluate their teams and create individual development plans for their people. In 2022, 70 newly appointed managers attended the relevant Performance Management training.

Employee Selection

OTE Group seeks to enhance its potential to work with suitable candidates for agile structures and demanding projects, both inside and outside the countries of operation. The aim is to attract specialized professionals, who will be able to cater to the Group's transforming operations and high level 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

EMPLOYEE PERFORMANCE EVALUATION IN 2022



100%

EMPLOYEES AT OTE GROUP COMPANIES

final selection. It is supplemented by an assessment exam, which, if required, takes place in collaboration with an external consultant. In 2022, 179 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 2022, 234 employees were hired by the Group's companies.

It is worth mentioning that more than 25,000 candidates submitted their CV to the OTE Group's database, expressing their interest to join the Group.

In 2022, the Group actively participated in

INTERNSHIPS GREECE



624

university and technical school students completed an internship in 2022 at OTE Group companies in Greece

~4,000

young men and women selected OTE Group internship programs in the period 2015-2022

more than 50 career events and job fairs, organized by public and private institutions (educational and other organizations), thus enhancing its employer of choice profile and attracting new candidates. The Group focuses on building strong relationships with the University community, in Greece and abroad, aiming to attract top talent with specialized know-how.

As of 2022, external candidates can apply to job postings on the company's corporate page on LinkedIn and via its career site. In order to improve recruitment effectiveness, the Group has collaborated with "SmartCV", a Greek cloud-based applicant tracking tool. Through "SmartCV", candidates can easily apply to job posts, get automated notifications and feedback regarding their

2.1 EMPLOYEES | 2.1.5 EMPLOYEE SELECTING, ATTRACTING AND RETAINING

application and come in direct contact with the company's Recruitment Team.

In a comprehensive and modern working environment, opportunities are offered to students, such as interns, in order to apply the knowledge that they have gained from their academic course in a working environment. 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 sector, contributing to and accelerating the transition of businesses to the digital age. OTE Group recently was awarded as 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 talented candidates who stand out for their great achievements, high potential and ambition as lifelong learners.

In this context, contemporary talent management programs have been developed, each addressed to a different audience.



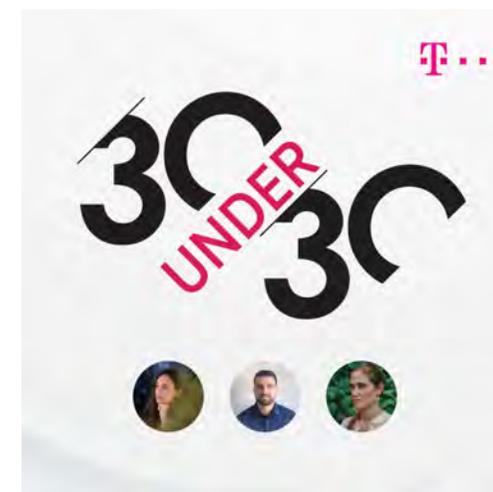
The Group's internal talent program for young employees is called "you.grow". The program provides participants with the opportunity to gain insight into all key business operations, through an 18-month on-the-job, rotational developmental journey. Upon successful journey completion, participants take on job roles. The 2nd cycle of "you.grow" was successfully completed in November 2022, when the 11 participants took on their new challenging roles according to their profile, their personal preferences, and their career aspirations.

Another talent program, addressed to employees within the GERMANOS Franchise

Retail Stores Network, is "G-Talent Review". The program, which runs in cycles every 2 years, aims to identify a "pool" of high potential talents within the retail network, who have the drive and ambition to join OTE Group in a role that matches their profile and preferences. The program's 5th cycle started in September 2022.

Moreover, as part of the Deutsche Telekom Group talent management initiatives, OTE Group employees in Greece can apply to participate in a variety of **global talent initiatives** that 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. **One of these initiatives is the new global leadership development program called "30 Under 30", which started in September 2022 and targets leadership high potential employees under the age of 30.** The program provides participants with the opportunity to experience an 18-month international journey full of different developmental and learning activities. Upon successful journey completion, participants will be able to take on new challenging leadership job roles while fostering the age diversity in leadership positions.



2.1.6 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. 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 culture and constantly encourages its people to take advantage of every opportunity to develop that is offered to them.

The COVID-19 pandemic was a great challenge, affecting not only the way of working, but also the way of learning and growing within the organization. Nevertheless, investing in new, digital ways of conducting training programs created the space to experiment and combine learning methods, e.g. face-to-face, virtual, or hybrid, and to deliver efficient learning experiences to the Group’s employees.

After a whole year of exclusively conducting virtual training, 2022 was warmly greeted, as the decrease in COVID-19 cases and ease of governmental restrictions, allowed for training to also be conducted in person.

Nevertheless, in an attempt to maintain balance, as well as to ensure that all employees remain safe, this year 83% of total training hours were held in digital classrooms, with the use of various modern digital training and interaction tools, which significantly enhance the training experience of employees.

All the upskilling and reskilling programs were designed and implemented periodically, throughout the year, in accordance with the needs of the Group. The ultimate goal of the trainings was to build strong capabilities across the organization. To identify the necessary capabilities, during 2022, OTE Group focused on the creation and launch of a new skill management process and tool, where employees will be able to see the required skillset, professional and social, for their business role, and follow a more focused and customised journey of learning.

Digital Learnings

Self-directed learning through digital learning platforms has become part of employees’ everyday life, mainly because it provides flexibility and ownership with unlimited access to thousands of training topics, in the form of digital courses. Moreover, online courses and learning material are great sources of rich and up-to-date content, which

able to address a wide range of learning needs and solve daily work issues, at any time, from all digital devices.

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, and is constantly enriched with new, more specialized thematic modules, available to all OTE Group employees.

Agile Learning

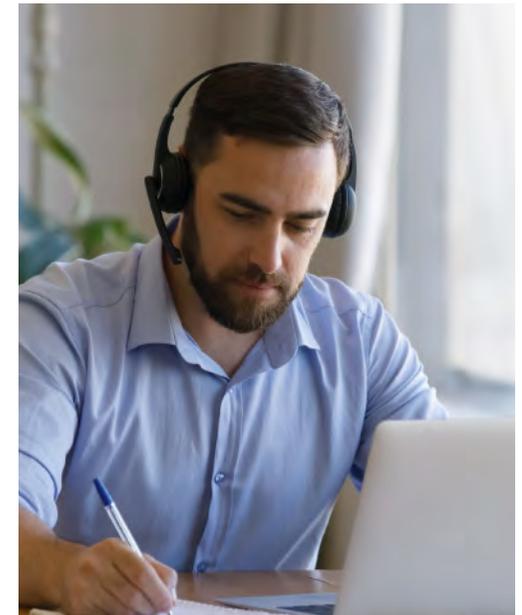
In 2022, OTE Group focused on the new topic of **Agile working and living**. Building cross-functional and self-organized teams capable of agile working, is a never-ending challenge in a huge organization. Taking into consideration the strategic priorities and the changes to its operating model, the Group implemented several training programs aimed at supporting, empowering, and leading employees to adopt new, innovative, and agile ways of working and thinking. The Group puts a great focus on understanding the needs, skills, and competencies of each agile role, based on new responsibilities. Following this, dedicated learning journeys were created, with the input of subject

DIGITAL LEARNINGS
GREECE



40,321

TRAINING HOURS
through digital platforms



matter experts to ensure the appropriateness of chosen learning initiatives. During 2022, **323 employees**, members of agile tribes and teams, participated in agile courses.

2.1 EMPLOYEES | 2.1.6 EMPLOYEE TRAINING AND SKILLS DEVELOPMENT

TRAINING
IN 2022

4,044

EMPLOYEES OF OTE, COSMOTE, GERMANOS & TELEKOM ROMANIA MOBILE COMMUNICATIONS ATTENDED ONLINE COURSES THROUGH DIGITAL PLATFORMS

 124,516
HOURS OF TRAINING

 58%
OF EMPLOYEES WERE TRAINED

14,629
PARTICIPATIONS
IN TRAINING PROGRAMS

€4,120,717
INVESTED IN
EMPLOYEE TRAINING IN GREECE

11.38

AVERAGE TRAINING HOURS PER OTE GROUP EMPLOYEE

9
TRAINING HOURS PER OTE GROUP EMPLOYEE IN THE TOP 10% OF EMPLOYEES BY TOTAL COMPENSATION

12
TRAINING HOURS PER OTE GROUP EMPLOYEE IN THE BOTTOM 90% OF EMPLOYEES BY TOTAL COMPENSATION



2022 TRAINING PROGRAMS IN GREECE

Large Scale Programs and Learning & Development Business Academies



1,502

B2B NEW BUSINESS ERA ACADEMY

This program is an extensive tailor-made training program of high value, covering all aspects of contemporary B2B areas such as Customer centric culture, Technology acumen, self-awareness and collaboration courses.

THE GRID ACADEMY

THE GRID Academy represents a continuous learning journey for the new Agile teams, where everyone becomes acquainted with the values, mindset and practices that follow an Agile culture. As part of this journey, Agile Bootcamp includes tailor-made and integrated learning experiences, through which agile team members acquire the necessary soft and hard agile skills, to contribute to the success of their team, build strong relationships and create an environment of continuous learning and development. Additionally, advanced training and certifications, suitable for each Agile role have been incorporated to support and empower specialized roles.

258

IT NEXT GEN ACADEMY

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 career. Participants have the opportunity to be trained in various topics, starting from basic concepts of new IT Architecture and continuing to more specialized areas.

486

CTS ACADEMY 4^{THE} FUTURE

This program is aimed to create the next generation of COSMOTE Technical Academy, by providing a tailor-made long-term learning program for COSMOTE Technical Services employees, aiming at enhancing participants' professional skills and knowledge on current tech developments, future technological trends

3,863

2022 TRAINING PROGRAMS
IN GREECE

#ASTO_PANO_MOU ACADEMY

This is a culture change Academy for Customer Operations, i.e., for the call centers and stores. Inspired by the strong vision of the management of Customer Operations, namely, to achieve the excellent service and satisfaction of OTE Group's customers, different projects were created, in four pillars, that support the change of culture and the empowerment of the employees. It includes a specialized leadership program "Coach for growth" for all executives, the "mpes sti thesi mou", which is a voluntary 2-day rotation program with individual development centers for supervisors and training programs to empower front line employees.

SHOP QUALIFICATION PROGRAM (SQP)

SQP is a reskilling program for employees who want to take on the role of Sales Representative. The training aims to present all the telecommunications products and services and to ensure trainees acquire the required sales skills that will ensure excellent customer experience. In addition, it is an introductory program for new employees of the Stores.

TECHNICAL QUALIFICATION PROGRAM (TQP)

This program includes all the main knowledge and skills required for roles in the technical field and gives participants the opportunity to receive an intensive training in network architecture, copper and fiber optics, along with new generation technological services provided through them.



548

CORE LEARNING PILLARS

GROWTH MINDSET

This program expresses the will to broaden employees' horizons as people and professionals, to evolve and improve their habits, to face new challenges that extend their boundaries by giving them new experiences, knowledge and skills. This revolutionary soft skill program summarizes the concept of "Growth mindset" and highlights the importance of focusing on effort and not on difficulties, embraces challenges as a way to move forward, points out learning by mistakes, and underlines the value of feedback when it is seen as an opportunity for improvement.

DIVERSITY & INCLUSION

This program is an experiential educational program with the purpose to create a working environment that respects and defends diversity. Through the activities of the program, employees obtain a common understanding on the basic concepts of diversity, share their thoughts on stereotypes, beliefs, discrimination and finally, receive multiple stimuli to undertake actions that will support diversity and inclusion within the work environment.

POSTGRADUATE PROGRAMS

Postgraduate programs offer learning experience, completely focused on professional expectations, expanding employees' knowledge and enriching their skills. Nominated by their line managers, professional employees with potential and passion for personal growth, may apply to a Postgraduate Program of their choice, granted 50% of the cost by OTE.



134

109

6

2.1.7 EMPLOYEE COMMUNICATION, ENGAGEMENT AND SATISFACTION



GROWTH MINDSET, CROSS FUNCTIONAL COLLABORATION & OPEN COMMUNICATION ACT AS 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

CEO Business Talks and other strategy/business information formats

For the first time in June 2022, a new strategy cascade communication process was introduced, called "CEO Business Talks". The talks included a brief CEO input on topics such as strategy, company performance, market competition status, etc.

The event was digital, open to all OTE Group companies in Greece. More than 7,600 employees watched the event via livestreaming.

This strategy cascade was also supported via events with similar scope, targeted at specific OTE Group audiences (e.g. Directors meetings). Furthermore, employees had the opportunity to watch via livestreaming other selected external events, such as the press conferences "Sustainability at OTE Group", as well as "Payzy app commercial launch", viewed by over 500 and 600 employees, respectively.

COSMOTE Awards

COSMOTE Awards initiative was designed and implemented for the first time in 2018, with the aim of highlighting employees' contribution to important company projects that are fully aligned with the Group's strategy. In 2022, the teams submitted their participations according to four categories: Customer Obsession, Innovation & Startup Mindset, Digital Company and Shaping Our Culture and A Sustainable Future For All. Two more categories were included, highlighting the best projects and practices. The "Employees' Choice Award", which resulted from the vote OTE Group's employees, and the "Large Scale Awards"

2.1 EMPLOYEES | 2.1.7 EMPLOYEE COMMUNICATION, ENGAGEMENT AND SATISFACTION

that referred to projects of high importance and impact on both OTE Group and Greek society.

In total, 39 projects were submitted. Fourteen of these projects stood out, with first and second place participants being awarded €5,000 and €2,000 respectively, at the annual awards' ceremony.

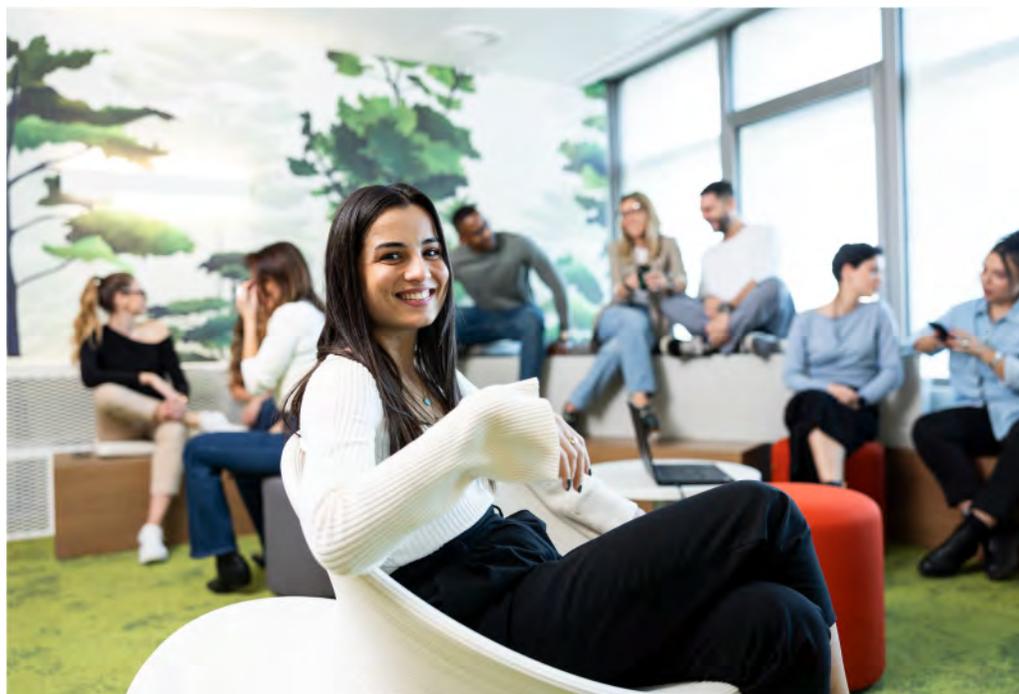
Employee Satisfaction

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

OTE Group¹, asks twice per year -on May and November- its employees, to give feedback about how satisfied they are with their work, in order to identify and address potential weaknesses and develop practices to eliminate them. The employee responses on the questions of "satisfaction", "employer attractiveness", "brand identity" and "inspiration" are used to calculate the engagement score, a gauge for employee satisfaction.

For November 2022, the employee survey showed a value of 77 on a scale of 0 to 100 at OTE Group level.



A total of 89%² of employees throughout the Group took part in the November 2022 employee survey. This high participation percentage was a record, corresponding to more than 8,600 employees throughout the Group, showcasing a clear engagement and interest of employees in the Group's strategy and contribution to success.

Digitization, innovation, learning, trust culture, 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 environments.

Moreover, the employee surveys included sustainability related topics, with gratifying results. More specifically, 90%² of the participants stated that they agree with OTE Group's environmental and social commitment, while a total of 90%² believes that OTE Group acts responsibly towards the

environment and society. Additionally, in 2022, two new questions were introduced regarding equal opportunities, non-discrimination and safe space. A 75% of participants believes that all employees are offered the same opportunities for hiring and career development within the Group, and 87%² believe that OTE Group provides a safe and supportive work environment for all.

All results are presented and discussed within OTE Group teams and an action plan is developed, along with corrective measures depending on the survey findings.

The Employee Survey is a dynamic and reliable diagnostic tool, and it evolves to reflect elements of the strategy and the objectives of OTE Group, as well as trends that dominate the external environment.

Modern Work Environment

A modern work environment and a digital employee experience contribute to increased employee satisfaction.

In recent years, OTE Group has been systematically investing in upgrading its building infrastructure, by renovating the headquarter building. The new office spaces follow the LEED and WELL standards, are of high aesthetics, and a new philosophy, with

1 Refers to the companies: OTE, COSMOTE, CTS, COSMOTE e-Value, GERMANOS, OTE Globe, COSMOTE Payments, OTE Estate

2 Data from November 2022 Survey

2.1 EMPLOYEES | 2.1.7 EMPLOYEE COMMUNICATION, ENGAGEMENT AND SATISFACTION



open spaces and collaboration spaces, while focusing on wellness, flexibility, and seamless communication between teams.

Additionally, the company provides modern equipment to all employees (laptops, collaboration tools etc.), has increased the use of automations, and has created digital channels at every point of contact with its people. In addition, it adopts the agile way of working in some functions (Commercial and IT), which enhances initiative, fast decision-making and collaboration, creating value for the company and its customers.

Team & Peer Feedback

Team & Peer Feedback is a new developmental tool designed to enhance engagement, driven by the excellent customer experience and development culture, two main pillars of COSMOTE Technical Services' (CTS) strategy.

It is a feedback system, specifically adapted to CTS' needs, which enables giving and

receiving constructive feedback on how colleagues and direct partners perceive each other's strengths and areas for improvement. At the same time, it enables employees to express their opinion about themselves, aiming towards further personal and professional development.

Initially CTS' employees at Section Manager level and above, participated in the Team & Peer Feedback process. By receiving feedback, from their team members, colleagues or direct partners (team and peer feedback), as well as providing self-evaluations, an individual report is produced in which only the participants and their direct manager have access. Based on the report, a personal feedback session is conducted with the direct manager so that customized, developmental plans can be designed. It is noted that the system ensures that all responses are anonymous and confidential.

INDICATIVE INTERNAL COMMUNICATIONS CAMPAIGNS AND PROGRAMS FOR EMPLOYEE ENGAGEMENT



VARIOUS CORPORATE CAMPAIGNS AND VOLUNTARY ACTIONS

were carried out to support the companies' social initiatives and employees' engagement. For example, in collaboration with "ENALEIA" regarding its "Mediterranean Cleanup" project, an initiative related to the cleaning of seas and coasts from plastic pollution in Greek islands, a communication campaign was launched. This campaign aimed to promote recycling in the company's buildings and retail network, but also involved beach cleanup actions. Furthermore, the "Recycling at home campaign", the "Blood and Bone Narrow donation programs", the employee participation for a good cause in the "Athens Authentic Marathon", along with goods' collection activities (children's books, food, medicines, etc.), were some of OTE Group's campaign and voluntary initiatives.

DURING THE CHRISTMAS PERIOD

a set of actions were carried out, with games, gifts, treats and activities, to enhance the holiday spirit.

FOR THE FIRST TIME, A LARGE SCALE ENGAGEMENT EVENT CALLED "MEET UP"

was implemented, after two years of social restrictions due to the COVID-19 pandemic. A party was organized for OTE Group employees in Athens, with more than 3,000 participations, as a great opportunity for them to meet again.

GREECE SIGNIFICANT DATA 2022

44

WEEKLY NEWSLETTERS

were sent to approximately **10,000 EMPLOYEES**

762

NEWS TOPICS

were communicated via OTE Group intranet
and mobile app to employees.

COSMOTE E-VALUE INTERNAL COMMUNICATION CHANNEL

In March 2020, COSMOTE e-Value launched the “Yasou” microsite, which is an informative and entertaining internal communication online platform, addressed to the Group’s 6,000 call center employees. Its aim is to sustain employee engagement during teleworking.

In 2022, taking into account that 60% of the employees of the call center industry work from home, “Yasou” microsite continues to be a relevant and useful communication tool.

The microsite informs, entertains, and maintains the interest of employees, with various content. The goal was, and remains, for every employee to feel like an active member of a big team.

The initiative received in total four awards at the PR Awards 2022.

- **1 Gold Award** in the category: Website/Microsite
- **3 Bronze Awards** in the categories:
 - Internal Communications/Employee Engagement,
 - Storytelling/Creative Content
 - Internal Communications & Employee Engagement

HIGHLIGHTS FOR "YASOU" MICROSITE:

11,116
article readings

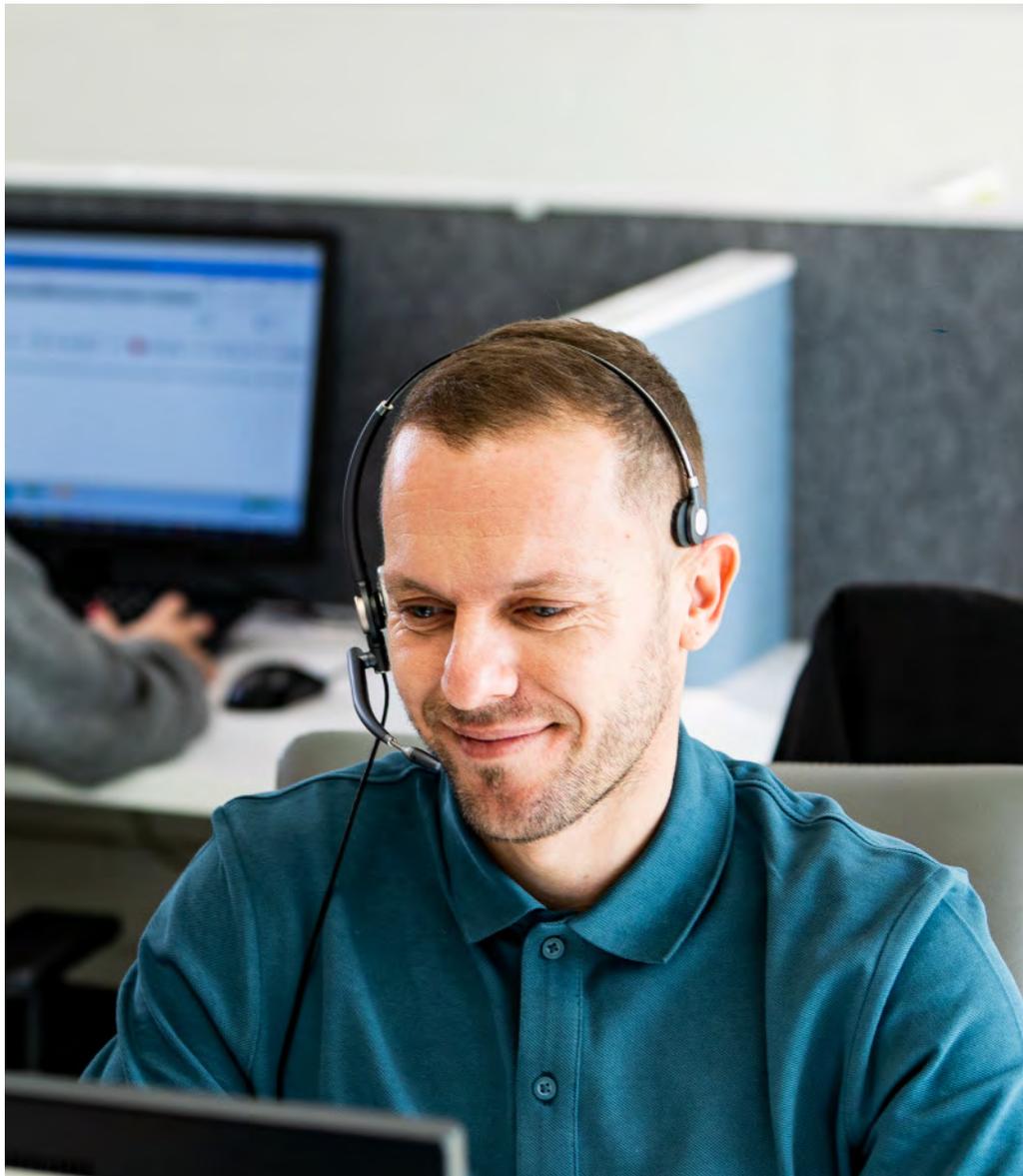
48
newsletters in 1 year

252
articles

71%
female visitors

29%
male visitors





COSMOTE E-VALUE **#ASTO_PANO_MOU**

A program focusing on front line employees aiming at ensuring Customer Excellence and strengthening the customer-centric philosophy. The vision is a team where all members share the same culture, the same values and the same passion for excellent customer service. Immediate, easy and unique service for each of the customers, at every point, upon every contact.

#asto_pano_mou is for 8,000 employees at the Call Centers of COSMOTE e-Value, COSMOTE, GERMANOS and COSMOTE shops.

The program received a Gold award at the European Contact Center and Customer Service Awards and 7 awards (two Gold, two Silver, three Bronze) at the PR Awards 2022.

Combined with the action #mpes_sti_thesi_mou, the program gave the opportunity for a two-day job rotation within the different Customer Operations business units (Call Centers and Retail Stores).

The 2,969 employees in 12 cities who participated in the action had the opportunity to:

- Experience first-hand how other roles interact with customers.
- Further understand the customer's journey and experience from within critical Customer Operation's touchpoints.
- Leave their comfort zone and experience other front facing units' day to day processes and operations.
- Widen their network of contacts and strengthen their collaboration with colleagues.
- Exchange and suggest ideas and proposals on best practices and optimizations.

#asto_pano_mou is calling you

COSMOTE e-Value, with the aim to enhance the #asto_pano_mou program and boost an idea-generation culture, encouraged its employees to submit their ideas, in the spirit of achieving and maintaining customer excellence at every step of the process. The timeframe for this initiative was from August to September 2022 and the target group was all Customer Operations' employees. Approximately 200 employees submitted their ideas and 10 ideas were selected for implementation/further evaluation.

- 2.2.1 Connectivity for All
- 2.2.2 Products and Services for Sustainability
- 2.2.3 Safe and Responsible Use of Technology
- 2.2.4 Communication with Customers
- 2.2.5 Customer Service and Satisfaction

Customers

910k

FTTH LINES IN GREECE

>€3bn

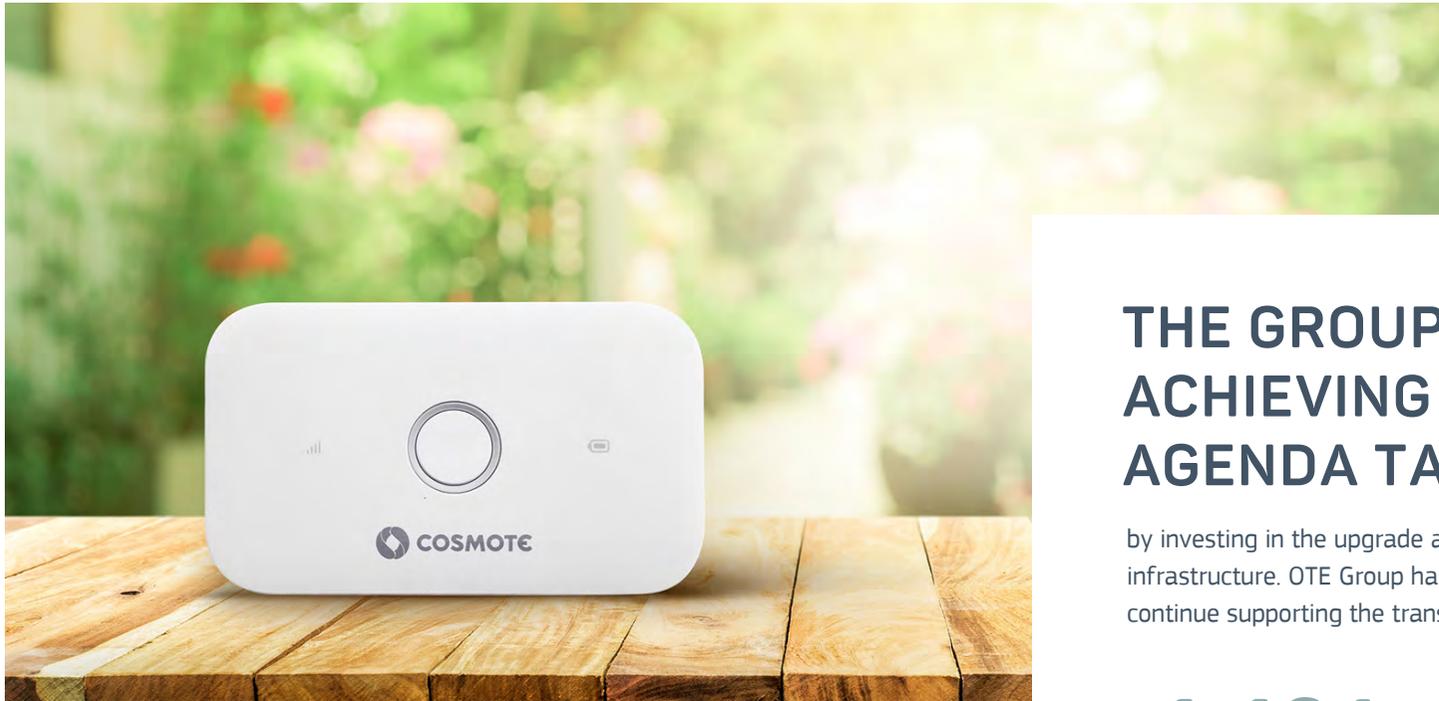
INVESTMENT PLAN
UNTIL 2027

80%

NATIONWIDE
COSMOTE 5G COVERAGE



2.2.1 CONNECTIVITY FOR ALL



THE GROUP CONTRIBUTES TO ACHIEVING THE 2022 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 supporting the transformation of Greece into a digital country.

The Group is the largest investor in new technologies and technological infrastructure in Greece, making significant investments in new generation networks, which will stimulate the Greek economy and facilitate 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.

Broadband penetration in total fixed lines reached 86% while the percentage of subscribers enjoying speeds 100Mbps or higher has reached 44% of fiber connections. This percentage was reinforced by the company's initiative regarding the provision of free speed upgrade for customers of residential and business fixed broadband internet, in areas where the fiber to the home (FTTH) is not available yet.

44%

OF FIBER CONNECTIONS WITH SPEEDS OF 100MBPS OR HIGHER IN GREECE

86%

OVERALL USE THE FIXED BROADBAND SERVICES

2.2 CUSTOMERS | 2.2.1 CONNECTIVITY FOR ALL

Greece

As a result of its extensive investments, the Group currently holds the largest fiber optic network in Greece. In 2022, OTE continued the roll out of its FTTH network, across Greece’s mainland and islands, launching for the first-time guaranteed internet speeds of 300Mbps, 500Mbps and 1Gbps.

By the end of 2022, access to FTTH unlimited capabilities was available to more than 910,000 households and businesses across Greece. OTE Group is aiming to reach 3m by the end of 2027.

COSMOTE, within just two years since the launch of the 5th generation network that was first to deploy in Greece, exceeded the target of **80% Greece-wide population** coverage of COSMOTE 5G.

Today, COSMOTE 5G is the largest fifth generation network in the country with coverage already exceeding 90% in **Athens, Thessaloniki and 37 other cities across Greece**. COSMOTE 5G is expanding rapidly throughout Greece, aiming to reach 90% population coverage by 2023.

Additionally, COSMOTE, the largest 4G network in Greece, with population coverage* approximately at 99% is continuously expanded and upgraded, in order to ensure seamless connectivity and communication even in the most remote parts of Greece.

In 2022, COSMOTE mobile network was declared by Ookla, as the "Fastest Mobile Network" in Greece for the 6th consecutive year. Furthermore, the "Best in Test" certification for mobile internet and voice services overall, as well as for individual benchmarking tests, was received from the internationally recognized network benchmarking company umlaut, part of Accenture, for the 8th consecutive time.

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. In the last year, Telekom Romania Mobile's network quality has improved in 1,200 localities with 10.6 million inhabitants. In the first half of the year, upgrades resulted in better coverage in over 440 urban and rural areas with a total of 345,000 inhabitants, while 4G coverage exceeded 98% of the population. In addition, in August 2022, Telekom Romania Mobile introduced VoLTE (4G) voice calls. As a result, customers can enjoy a better mobile voice experience and higher data transfer speeds. 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, while the average values recorded were approximately 150 Mbps.

GREECE

> 3.4m

HOUSEHOLDS & BUSINESSES THROUGHOUT GREECE HAVE ACCESS TO SPEEDS UP TO 200MBPS VIA **COSMOTE FIBER**



~3m

FIBER-TO-THE-HOME (FTTH) LINES THROUGHOUT GREECE, UNTIL 2027



POPULATION COVERAGE* BY **COSMOTE 5G NETWORK**; 90% BY THE END OF 2023



POPULATION COVERAGE* BY **4G NETWORK**

OTE GROUP'S SHARP INCREASE OF TOTAL FUTURE INVESTMENTS, SET TO EXCEED

€3BN BY 2027

COSMOTE'S MOBILE NETWORK CERTIFICATIONS



"GREECE'S FASTEST MOBILE NETWORK" award for the 6th consecutive year **BY OOKLA**



"BEST IN TEST" for mobile internet and voice services for the 8th consecutive time **BY UMLAUT**



* Population coverage refers to Outdoor Coverage.

2.2 CUSTOMERS | 2.2.1 CONNECTIVITY FOR ALL

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 are available, at different prices, aiming at making them affordable for everyone and tailored to their needs.

Greece

Residential customers could 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.

Moreover, more than **€630,000** discounts in fixed telephony and internet services were given to people with disabilities, in Greece during 2022. This translates to more than **6,000 people**.

OTE Group was the one and only telco that implemented the innovative project of free upgrade of broadband speeds for existing Double Play Subs. So gradually, our customers from March 2022 enjoyed higher Internet speed connection after being



automatically transferred to the immediate next commercially available Internet speed, while maintaining the same price.

In September 2022, OTE S.A. announced the availability of COSMOTE Fiber 300Mbps, 500Mbps and 1Gbps programs via FTTH infrastructure, in order to offer the ultimate Internet experience to eligible clients. The programs offer 100% guaranteed speeds and optical fiber to every home, covering all domestic needs and customer demands.

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 Wi-Fi access to **COSMOTE WiFi**, which is the largest Wi-Fi network in Greece.

Additionally, COSMOTE Double Play SIM was further utilized in order to provide solutions

for the customers in remote areas, who are not able to acquire a fixed broadband line due to the unavailability of fixed network.

More specifically, two new COSMOTE Double Play SIM rate plans were launched, offering unlimited data via the 4G, 5G mobile network and up to unlimited minutes for national and mobile calls. Moreover, the digital customer experience in COSMOTE App for all customers of COSMOTE Double Play SIM was enhanced, enabling customers to easily control their DP SIM asset.

In 2022, COSMOTE granted to all existing and new subscribers of COSMOTE GIGAMAX and COSMOTE BUSINESS GIGAMAX, mobile contracts unlimited talk to all national networks at no extra charge. At the same time, COSMOTE GIGAMAX and COSMOTE BUSINESS GIGAMAX have mobile data options that reach up to unlimited, without any speed limitation, through COSMOTE's leading 4G and 5G networks. The renewed plans of COSMOTE are designed for all customers, with options starting from €24, so that subscribers have the plan that suits them.

In terms of subscription TV, COSMOTE offers its customers its own new service product of COSMOTE TV where subscribers are able to:

2.2 CUSTOMERS | 2.2.1 CONNECTIVITY FOR ALL

- 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 multiple options and service combinations. There are also available packages without any financial commitment for customers who want to watch the specific content, for a limited time period or selected events.

In 2022, **COSMOTE Neo**, the first 100% digital mobile plan, enhanced its benefits by doubling the offered data and increasing the voice time, offering more flexibility to the customers, at the same price.

During 2022, COSMOTE, launched a series of dedicated offers for all customers throughout the year, such as free unlimited data for five consecutive weekends during the Holy Spirit long weekend for both prepaid and postpaid customers. Free unlimited calls from fixed line telephones to all fixed and mobile devices, BOX special offers and one-month

free TV entertainment pack to all customers during Christmas period.

Especially, taking into consideration the various and immediate communication needs, COSMOTE offered throughout the year:

- 15 days free unlimited data (Easter offer for postpaid subscribers)
- Free unlimited data for 3 days (During national holidays: Clean Monday 7th of March, 25th of March, Holy Spirit 13th of June, 28th of October)
- One-month unlimited data, only €9.90 (Summer offer)
- Free unlimited data for 15 days (Back to school offer)
- 15GB for free, for 7 days (Christmas offer)
- Unlimited minutes free talk time to customers for 7 days (Christmas offer)
- 30GB data for free, for 7 days (Christmas offer)
- Free unlimited data for 15 days (Christmas offer)
- Free unlimited data for 7 days for FMC customers

In 2022, What's Up (Youth prepaid brand of COSMOTE):

- Continued promoting DIY and student DIY packages to prepaid What's Up customers,

exclusively through the What's Up application, allowing customers to create an affordable package that fully covers their own needs. In 2022, the DIY packages reached approximately a 15% penetration in monthly combo voice/data packs.

- Introduced new Reload-it reward scheme exclusively through What's Up application, offering better recharge bonuses (tokens), free gifts in user's birthday and network anniversary and even in random occasions (mystery tokens).
- Offered double GB at the same price for the most popular data packs (gigamonth, and several short period data packs).
- Launched new monthly packs with abundant voice to all and unlimited minutes to all voice pack in prepaid.
- Offered new affordable unlimited data options for day, weekend, nights, week and 4 weekends options.
- Launched WHATSUPIA. This service offers free data to all What's Up Student subscribers, every day, when they are in Greek Public University campuses. The service is available exclusively from What's Up app, it is GPS enabled and is offered to 140 locations in 64 cities all over Greece. Since its launch in November 2022, approximately 60,000 users have

benefited from this service by enjoying free data while at their universities.

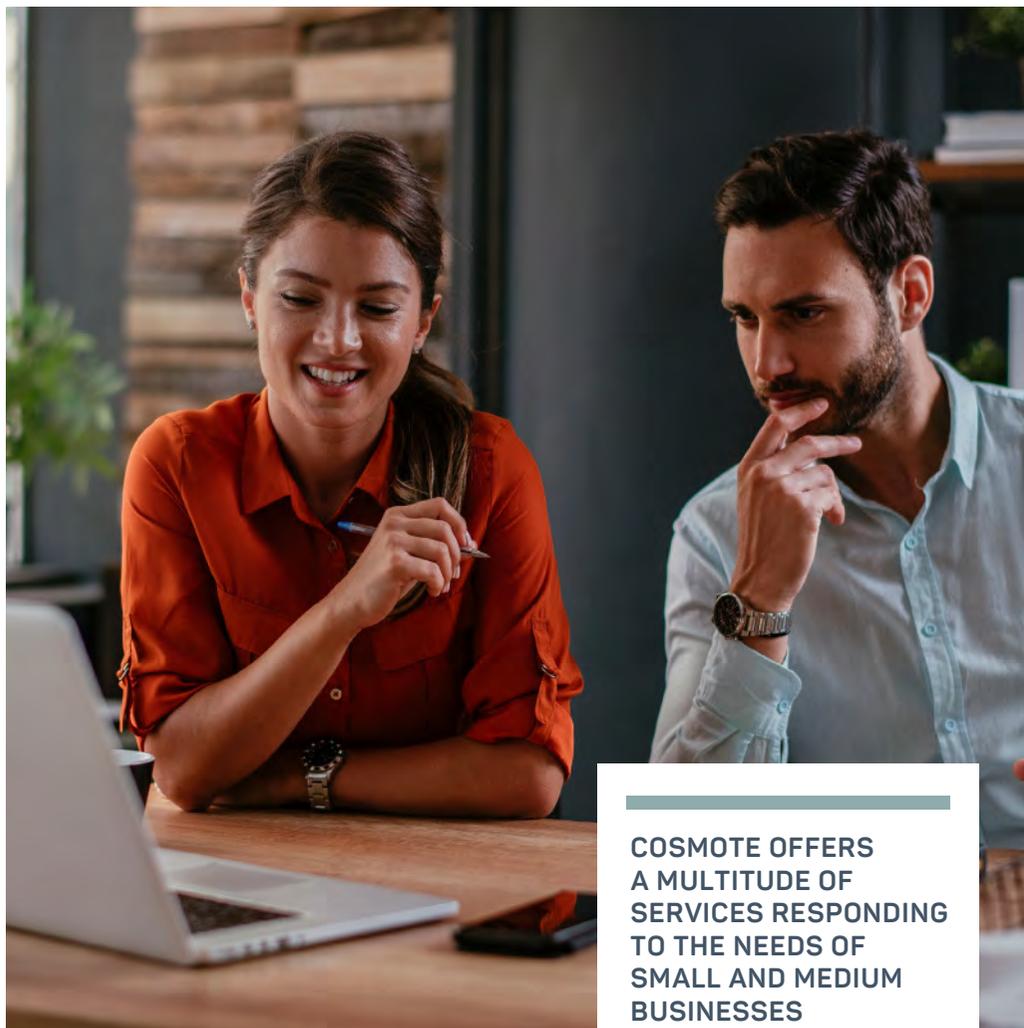
COSMOTE One, the COSMOTE loyalty scheme for subscribers who combine at least one fixed line and one mobile line, further enhanced its benefits by offering:

- Triple data for Family rate plans and continued to offer double data for all customers to Gigamax Individual and Family rate plans
- 2GB instead of 1GB for prepaid customers
- 2GB instead of 1GB for customers with COSMOTE Mobile hybrid rate plans.

At the same time, COSMOTE One improved the digital customer experience of COSMOTE App for all household members. **Business customers**, similarly to the residential ones, could acquire FTTH at a basic rate plan by using the government's subsidy (**SFBB Coupon**). Moreover, existing **COSMOTE Business Double Play and COSMOTE Dedicated Internet Access subscribers** enjoyed a free upgrade of internet access speeds, as from March 2022 they were gradually being automatically transferred to the immediate next commercially available Internet speed while maintaining the same price.

COSMOTE Business One program enables businesses to operate more efficiently

2.2 CUSTOMERS | 2.2.1 CONNECTIVITY FOR ALL



COSMOTE OFFERS A MULTITUDE OF SERVICES RESPONDING TO THE NEEDS OF SMALL AND MEDIUM BUSINESSES

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). In 2022, the programs have been enriched with 2GB extra (up to 10 connections) and double number of "Data Boosts" (The latter offers unlimited data for 24 hours for the business mobile programs.) In addition to that, a "value basket" has been introduced where they can pick the offering they consider best suited to their needs. Customers can choose between a €50 gift card and double the data on the COSMOTE GIGAMAX Mobile Internet Plan, free extra 600 minutes to mobile or €5 discount on the COSMOTE Internet Backup service.

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 stay connected to the Internet, ensuring, in this way, its efficient operation at all times. In December 2022, a

new enhanced portfolio was launched, with unlimited voice time to Fixed & Mobile, extra voice (time) to international destinations and OnNet Security services. Last but not least, the new plans continue to include useful tools, such as PBX services, web hosting etc.

COSMOTE provides a wide range of **Business Cloud applications** which offer direct and easy access to cloud applications that meet their operational needs, while reducing their costs. Namely:

- **Microsoft 365**, which provides businesses with tools required for flexibility and continuous cooperation from anywhere. In 2022, COSMOTE offered the service at a lower price, guaranteed for a whole year.
- **COSMOTE Business Cloud Servers**

In October 2022, COSMOTE launched new **COSMOTE Business GIGAMAX mobile portfolio** to meet increasing business needs of B2B customers for **uninterrupted connectivity, work from everywhere options and business continuity**.

New tariffs offer further **data liberation**, with **no limitation in internet speed, free calls without limit and productivity tools** through the biggest mobile network in Greece and the **broadest 5G network experience**. Customers

2.2 CUSTOMERS | 2.2.1 CONNECTIVITY FOR ALL

can choose among five different rate plans depending on their needs. Tariffs differ on the data allowance, international minutes and roaming Travel Passes available. For the first time, high value tariffs (Advanced, Ultimate, Ultimate plus) offer **Microsoft 365 licenses for free** to enhance B2B customers' options for collaboration and productivity.

Furthermore, with the new **COSMOTE Business GIGAMAX**, and on top of increased data allowance offered in tariffs, subscribers have also the option to receive unlimited data, for specific days during the month, by activating the exclusively integrated Data Boost service, via My COSMOTE App. In addition, COSMOTE offers affordable mobile data add-ons, which provide customers with a faster and more affordable mobile Internet service. Same as 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 125 countries all over the world at a low daily cost. Moreover,

COSMOTE also provides **COSMOTE Roaming Now** additional data packages for Prepaid and Cost Control subscribers.

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 Your Business**, a new online service that enables B2B customers create an e-shop or website on their own, in a few steps. The service is offered free of charge for the first six months.
- **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 or unwanted charges. The service provides real-time information of the available GB, sends instant notifications when the available GB run out, and gives the users the option to decide how they want to continue navigating. The service is offered free of charge for all B2B customers (postpaid and COSMOTE Business Mobile Cost Control).



Romania

In 2022, Telekom Romania Mobile continued to deliver on its brand promise, "Mobile as you want it. Simple and fair", with a focus on customer experience. Its offers enjoyed very good feedback: 80% of customers who interacted with Telekom were very happy with the services they received, according to the survey conducted using the "Voice of the Customer" monitoring platform on a sample of 200,000 Telekom Romania Mobile Communications S.A. customer respondents between January and August 2022.

The company continued to provide mobile postpaid and prepaid services with unlimited benefits to its mobile customers at a great value for money, and its Nelimitat WiFi service, offering unlimited portable internet anywhere, anytime, on any device: smartphone, smart TV, laptop, tablet.

The company marked the four million customer milestone in the first half of August 2022.

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 2022, 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**, additionally, with 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
 - Microsoft Azure Services
 - Assessment Services
 - Modern Workplace Solutions
 - SAP on Azure
 - Data and Analytics
 - Hybrid Data Center

In 2022, the Business Cloud and Applications service line generated remarkable results, namely:

- **22% increase** in total COSMOTE Public Cloud SaaS revenues in Greece compared to 2021.

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 2022, the Fleet Management service line generated remarkable results, namely:

- **29% increase** in fleet management revenues in Greece compared to 2021 revenues
- **19% increase** in number of commercial vehicles using the fleet management service in Greece compared to 2021.

ENERGY MANAGEMENT



Solutions for better energy management consumption by businesses, to reduce their operating costs and build an "environmentally responsible" profile.

- **e-Energy**

INTERNET OF THINGS



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, and the Municipalities save on valuable resources and reduce spending.



The Municipality of Vari, Voula, Vouliagmeni selected COSMOTE, for the procurement and implementation of a smart waste collection bin system. The solution utilizes Narrow-Band Internet of Things (NB-IoT) technology, as it requires a small amount of data to interconnect devices over the mobile network, thus drastically reducing energy consumption and cost. In this context telematics devices will be installed in 5,300 medical waste collection bins of the Municipality, allowing its cleaning service to monitor, remotely and in real time, how full they are and their condition, while also dynamically planning for their placement according to demand, through a data analysis and evaluation platform. Additionally, tablets with drivers' navigation app will be installed in all of the Municipality's waste disposal trucks, for the targeted routing of collection vehicles in accordance with the actual collection needs. Smart waste management helps municipalities reduce their carbon footprint and adopt more environmentally friendly collection routes, helping to reduce gas emissions in cities.



2.2 CUSTOMERS | 2.2.2 PRODUCTS AND SERVICES FOR SUSTAINABILITY

CONNECTIVITY AROUND THE GLOBE



OTE Group's Satellite Teleport in Nemea was selected by Kongsberg Satellite Services (KSAT), a leading provider in satellite & earth observation services, for the -first of its kind- optical ground station for commercial use. Operating state-of-the-art infrastructure, KSAT provides earth observation data and images to global organizations of the environmental monitoring sector.

For the needs of the project, OTE Group installed and incorporated KSAT's specialized equipment at the Satellite Centre in Nemea. With cutting edge satellite infrastructure and excellent know-how, OTE Group has undertaken the provision of infrastructure-as-a-service, the connection satellite-to-earth, as well as 24x7 operational support of the service by specially trained personnel.

The use of optical signal instead of radio frequencies, allows for the collection of a greater volume of data from space via laser at every pass of the satellite. As optical satellite communications require clear, cloud-free weather conditions, the Nemea region was proven to be an ideal choice, with up to 95% clear-sky probability in summer.



THE FIRST CAMPUS NETWORK IN GREECE, 300 METERS UNDERGROUND



COSMOTE designed and installed an innovative campus network (private network) with mobile network at the underground mine of Olympias, operated and developed by Hellas Gold in the Halkidiki Peninsula. This is a very technologically complex project, unique in Greece, at a depth of 300 meters underground, covering underground adits extending over an area of approximately 10 km. This innovative technological solution achieves enhanced safety and productivity, creating the conditions for complete digitisation of the mine.

More specifically, the campus mobile network, which is fully adapted to and specially designed for the operational needs of Hellas Gold, ensures coverage and guaranteed capacity for the daily operations of the mine. Using tablets, workers underground can communicate more directly with transport operators, with their colleagues on the surface, and especially with the company's state-of-the-art Control Centre. Production time is also increased, as shifts, production and fleet management are organized more efficiently. The benefits of this campus network include direct transfer of critical data (weight of ore during loading, type of material to be transported, machinery failures, etc.).

The Company plans to further develop the campus network by creating new applications and technologies that will enable remote mining, remote loading and vehicle telemetry (remote data collection). Safety will also be enhanced with the future real-time monitoring of the number of employees in each section of the mine, providing critical information in case of emergency. Furthermore, through the appropriate sensors for measuring the concentration of particles or hazardous gases in the atmosphere (gas monitoring), the Control Centre will be able to remotely regulate the supply and quality of air (ventilation on demand), or even preventively evacuate employees, protecting them.



CONNECTIVITY SOLUTIONS



COSMOTE contributes to the digital transformation of MOTOR OIL through the SD-WAN solution

In 2022, COSMOTE provided MOTOR OIL with the innovative, integrated SD-WAN solution, upgrading its telecommunications network in terms of efficiency, safety and reliability. SD-WAN, in combination with connectivity services and the high-end ICT solutions provided by COSMOTE, makes a decisive contribution to the digital transformation of the MOTOR OIL Group. The need for uninterrupted and secure communication between the MOTOR OIL Group's 35 points of presence throughout Greece, as well as the option for independent and secure access to the internet and to Cloud services, with a guaranteed high level of service and availability (SLA), both at the network level and at the level of applications and services, were the reasons behind the adoption of SD-WAN by the modern energy group, which plays a leading role in Greece and the wider Eastern Mediterranean region. The solution runs vertically through the four main pillars of the strategic development of the MOTOR OIL Group, guaranteeing successful progress in the projects that are under way. The MOTOR OIL points of presence were interconnected in the most secure manner, which was important for the Group, ensuring high availability by utilizing all circuits in the network, as well as potential for expansion. At the same time, the performance of company applications increased, and the overall experience of users/employees was improved, thus increasing productivity for the MOTOR OIL Group.

COSMOTE implements SD-WAN network for Euromedica

In 2022, COSMOTE implemented a state-of-the-art Software - Defined Wide Area Network (SD-WAN) for Euromedica. This is a complete WAN virtual architecture solution, designed for companies with multiple points of presence. Euromedica's SD-WAN will enable it to centrally and securely manage 30 points of presence, modernizing its operations and increasing its efficiency. With the implementation of an SD-WAN network, Euromedica dynamically promotes its digital transformation, by investing in a reliable, fast and secure network that provides: high-quality connectivity services, optimal utilization of its applications, central management, high security and protection of its operational data. Thanks to the central management of its diagnostic centers and clinics, Euromedica will increase its competitiveness and productivity, while at the same time providing faster and safer service to its customers.

OTE GROUP DIGITIZING THE NATIONAL HEALTH SYSTEM OF CYPRUS



The National Health System of Cyprus is entering the new digital age with the implementation of an integrated health information system, a project undertaken by the OTE Group through an open international tender. This is an emblematic project of the Cypriot Ministry of Health and the State Health Services Organisation (SHSO), designed to upgrade, streamline and automate the procedures and health services provided to the citizens of Cyprus, with the assistance of technology. The project includes the functional, operational and technological modernisation of all Public

Health Units (hospitals and health centres). The integrated health information system to be implemented by the OTE Group will include all the functions of a modern hospital. Management of patients' medical files and the entire hospitalisation procedure, from admission to discharge, including prescriptions, will be carried out electronically. The system will also include the operational functions of health units – such as management of clinical laboratories, intensive care units, blood banks – as well as administrative functions, including human resources management, cost control, stock and facility management, etc.

This will upgrade the level of health services that patients enjoy, and public hospitals and health centres will increase their productivity while seeing a reduction in workload. At the same time, information will be more readily available, enabling faster decision-making and more efficient management.



INFORMATION SECURITY



Services for the increasing needs of businesses' security while they are using the Internet.

- **COSMOTE Business e-Secure**
- **Mobile Device Management**
- **COSMOTE Mobile Security Anti DDos**

In 2022, COSMOTE launched the new service **COSMOTE OnNet Security** which allows users to protect all devices connected to a broadband Internet connection automatically, detects malicious websites and automatically blocks their access on a DNS level. The service is provided in all the new **COSMOTE Business Double Play** programs.

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 applications are **My COSMOTE App** and **cosmote.gr** portal, especially the area of **My COSMOTE**, which have been enriched with new functionalities in 2022, aiming to reach a broader audience of Business customers. This has been achieved by enhancing e-sales capabilities, introducing a new integrated approach for mobile renewals offering customers a complete offer. Upselling capabilities have also been boosted by giving fixed line customers the ability to purchase **COSMOTE Internet Backup** through digital channels, offering an end-to-end digital experience. Moreover, a special self-care portal has been created (KA/LA Portal) to better serve large customers, as well as the creation and management of the new **COSMOTE Business One** proposition.

Moreover, OTE Group is moving rapidly towards meeting the demands for digital transformation. In this context, more than 72% of B2B clients are using the e-bill platform to pay their bills; an 12% increase compared to 2021. In addition, 1/2 of e-top ups are being steadily performed electronically, through the Group's channels.

Plenty developments in COSMOTE App were deployed in 2022 aiming at enhancing end-to-end digital self-service and self-support without the need to contact Customer Service.

Find more details in section **Customer Service and Satisfaction**.

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.

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.

In 2022, a new service has been launched, enabling digital presence for small and medium-sized enterprises. **COSMOTE Your Business** online allows users to create a site and/or e-shop free of charge for the first 6 months and configure it as they wish, with a few simple steps.

COSMOTE Digital Marketing4U

A digital advertising consulting service, provided by certified campaign specialists for the design, creation, execution and monitoring of digital campaigns on Social Media platforms targeted towards Small & Medium Business Customers.

COSMOTE New Site 4U

A service provided by experienced web designers & developers for the design and creation of custom-made web sites targeted to Small & Medium 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, (NLP, ML, Machine Vision) Interactive Technologies and Robotic platforms (Drones, Mobile/HRI) are carried out. These experiments

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**



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

2022, the IT Innovation Center Team got in contact or/and reviewed over 190 new startup companies.

- 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.



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, AI/ML, 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 companys 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).

2009-2022

PARTICIPATION IN

>100 RESEARCH PROJECTS

COOPERATION WITH

>800 PARTNERS / ORGANIZATIONS SUCH AS ENTERPRISES, UNIVERSITY AND RESEARCH CENTERS IN GREECE AND OTHER EUROPEAN COUNTRIES



PARTICIPATION IN



31

research projects in total co-funded by the European Commission, regarding programs/initiatives, like the Horizon 2020, Horizon Europe and CEF (Connecting Europe Facility). Thus, contributing actively to shaping and evaluating of future 5G/6G technologies, infrastructures, services and novel business models in various vertical markets.

All research projects aim at Sustainable Development with benefits to society and the environment.

13

new research projects were approved, in 2022, for €6.4m funding up to 2025.

Indicatively, the following projects focus on the protection of the environment with continuous reduction of energy consumption: [aerOS](#), [NEMO](#), [PHOENi2X](#), [Smart5Grid](#), [DAEMON](#), [OCTAPUS](#), [Int5Gent](#), [5G-MOBIX](#), [5G-VICTORI](#), [InterConnect](#).

In addition, all the projects refer to innovative applications with benefits to society (transportation – public transport, air-quality, public safety, privacy protection, health – health care, nutrition, technology etc); indicatively: [aerOS](#), [NEMO](#), [PHOENi2X](#), [LIFE - SAFE CROSSING](#), [C-ROADS](#) Greece, [AEOLUS](#), [MARSAL](#), [VITAL-5G](#), [5G-INDUCE](#), [5G-ERA](#), [UNIQORN](#), [SLICES-SC](#), [EVOLVED-5G](#), [5G-COMPLETE](#), [LOCUS](#), [MonB5G](#), [RECOMBINE](#), [FASTER](#), [DataPorts](#), [5G HEART](#), [5G!DRONES](#), [5G-TOURS](#)



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



OTE Group, apart from delivering top quality products and services, aims to continuously raise awareness, inform and educate its customers and the public on the safe and responsible use of its products and services, in order for everyone to benefit from the unlimited possibilities that technology offers.



Acknowledging the rapid development of new technologies and interactive media, and driven by the conviction that prevention and proper information can ensure the appropriate use of those means and minimize potential negative impacts, the Group has developed a holistic approach on this matter. Starting from the Group's responsible operation and the incorporation of regulatory requirements, moving to the provision of specialized products & services, implementing awareness and prevention initiatives, the collaboration with recognized bodies and the participation to self-regulatory initiatives.

Safe Use of the Internet

The Group has developed programs and initiatives to contribute to the safe use of the internet by minors in order to prevent relevant negative impacts such as the access to webpages with inappropriate content, cyberbullying, excessive use of the internet.

Products and services for safe use

OTE Group offers 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 2022, COSMOTE continued 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 15 GB 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 one, apply Web Filtering, restricting children to only visit certain website categories, activate cyberbullying alert if their child has been verbally abused on social media, set time limits and activate Geo-location. Parents can manage their children's activity in all types of devices (mobile, tablet, laptop, PC) through their own device of choice.

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, 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,

2.2 CUSTOMERS | 2.2.3 SAFE AND RESPONSIBLE USE OF TECHNOLOGY

it offers browsing protection to smartphones when surfing online via Wi-Fi or on COSMOTE's network and secures phones against malware, and phishing attempts. Personal data cannot be hacked, and online purchases and transactions are 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 TV channels of their choice.

Informing and educating the public

- **Sessions at OTE Group Telecommunications Museum:** Since 2010, **informative meetings** for safe internet navigation have been carried out at the OTE Group Telecommunications Museum. In 2022, the awareness raising sessions on how to avoid and respond to the risks associated with new technologies were held by the Cyber Crime Division of the Hellenic Police and addressed to primary and secondary school students.
- **Safer Internet for Kids:** Telekom Romania Mobile developed an educational

campaign in social media through the educational project "Online, being informed is being protected". The campaign is built around celebrating the international Child Online Safety Initiative. The educational campaign Safer Internet for Kids targeted parents and their children on the assumption that parents are primarily responsible for children's education. The campaign run on the Facebook and LinkedIn pages of Telekom Romania Mobile during February and March 2022, reaching more than 1mil people. It consisted of six video tutorials and a poll supporting the topic. Each video incorporated subject-related facts and data along with useful advice from an expert – psychotherapist Simona Nicolaescu. The campaign topics include prevention of cyberbullying, online security, internet safety, online-time reduction, handling online ads and negative messages.

Collaboration with recognized bodies

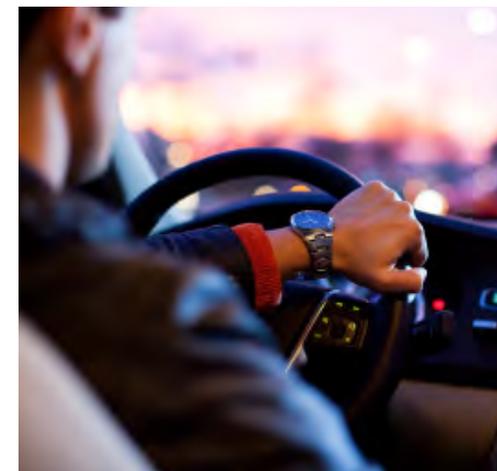
- **The Smile of the Child:** COSMOTE and GERMANOS are supporting, the 1st Mobile Laboratory of Education, Technology and Information in Greece, "ODYSSEAS", which is an initiative introduced by the organization "The Smile of the Child" and

operates under the auspices of the Ministry of Education, Research and Religious Affairs. The main goal of the initiative is for students, parents and teachers to be informed about important issues, such as internet safety, bullying, cyber bullying, abuse etc.

- **Cyber Security International Institute (CSII):** In 2022, COSMOTE, in collaboration with the CSII launched a series of informative and advisory short "How to" videos, aiming to raise the awareness of Internet and social media users on how to prevent and what steps to follow in order to deal with potential security threats during online navigation.

Participation in self-regulatory initiatives

OTE Group is participating in the **"ICT Coalition for the Safer Use of Connected Devices and Online Services by Children and Young People in the EU"** as a member of Deutsche Telekom Group. DT Group is a founding member of the Coalition which brings together many major companies from the digital economy and aims to help younger internet users across Europe to make the most of the online world and deal with the potential challenges and risks



Mobile Phone and Road Safety

COSMOTE aims to safeguard people's safety and facilitate the prevention of relevant negative impacts affecting road safety (e.g. automobile accidents). In this context, the company supports actions to educate the public and raise awareness on this matter about the responsible use of mobile phones while driving.

Specifically, 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". For yet another year, COSMOTE supported the "Iaveris" School of Road Behavior, enhancing its awareness activities on responsible road behavior.

2.2.4 COMMUNICATION WITH CUSTOMERS



OTE Group aims to systematically identify and manage the impacts, positive or negative, related to the communication with its customers. It recognizes that the responsible marketing practices, the compliance with regulations for the provision of services and the use of devices, as well as the provision of clear and transparent information can have a positive impact on customers and society.

In this way, it eliminates any societal confusion and distrust related to or the services offered by the Group's companies and their communication. Our internal policies, as mentioned below, safeguard our commitment to the public to operate responsibly in respect to marketing communications and safety signaled customer products.

Responsible Marketing

OTE Group conforms to the applicable laws and regulations regarding communication and advertising.

All promotional materials are reviewed prior to their release, in order to ensure that they abide with applicable laws and are suitable, impartial, genuine and that they respect diversity.

The Group's companies in Greece follow the Hellenic Code of Advertising and Communication Practice by the Advertising Self-Regulation Council (SEE).

In 2022, regarding non-compliance with the Code, the SEE issued, at first and appellate level, **0 decisions involving OTE, 3 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 2022, RAC issued no complaint for advertising campaigns.



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. The

webpage of 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 is regulated by the Hellenic Telecommunications and Post

2.2 CUSTOMERS | 2.2.4 COMMUNICATION WITH CUSTOMERS

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 a more regulated spending. 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.

Safe, Branded Customer Products

Particular importance is placed upon the supply of safety products that comply with the applicable directives and regulations, eliminating the distribution of 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, both in Greece and Romania. More specifically, among others, it is in accordance with 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 Directive 94/62/EC on packaging and packaging waste. In addition,



COSMOTE equipment for ADSL / VDSL/FTTH and TV services complies with the eco-design requirements of Directive 2009/125/EC. Apart from CE labeling, the compliance of the devices 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 includes 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

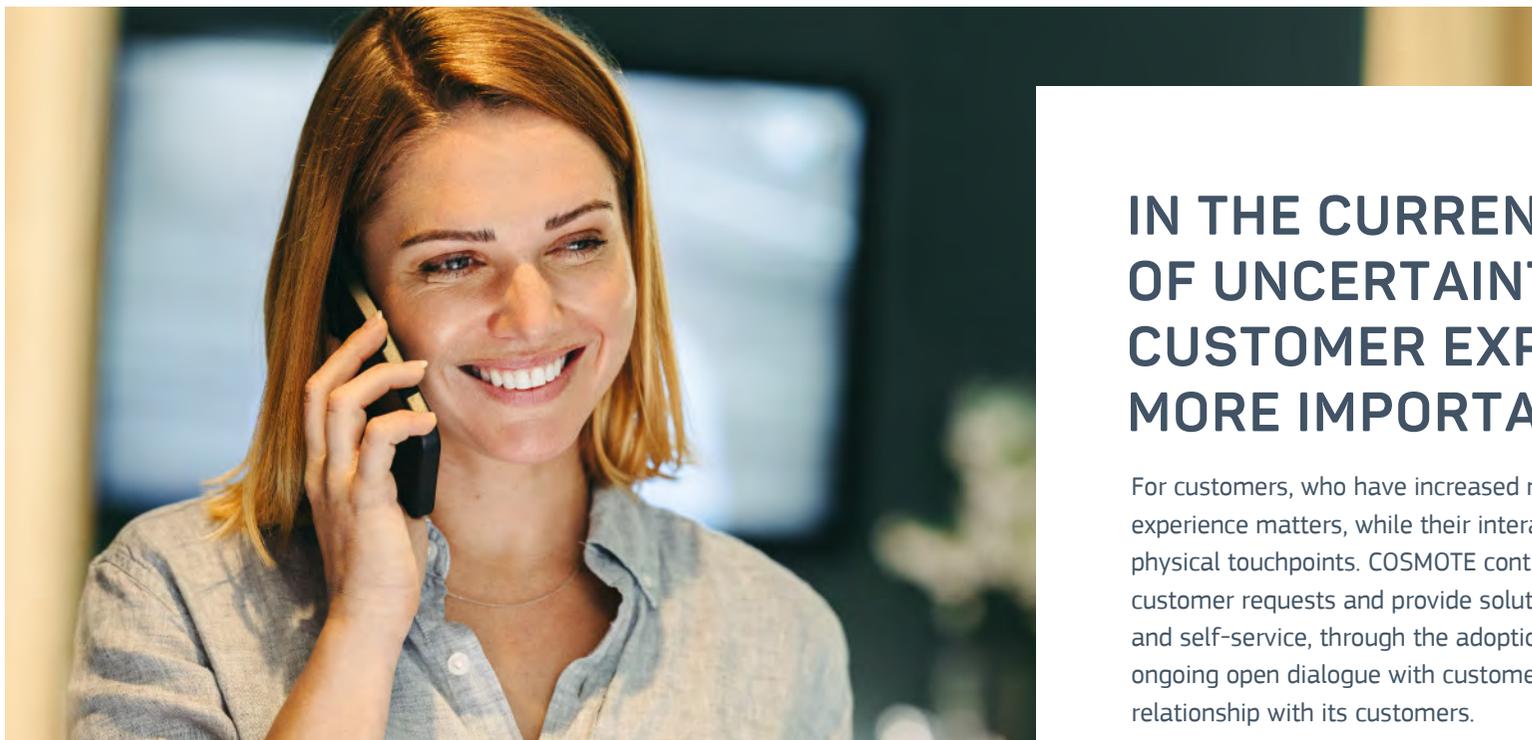
available to the customers inside product packages and upon request at the Group's retail network. Furthermore, suppliers are obliged to attach the required certification of their products and pay compensation for any damages, due to non-compliance with European and national legislation.

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 either 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.

In 2022, no financial penalties were imposed to OTE or COSMOTE for non-compliance cases associated with the aforementioned issues.

2.2.5 CUSTOMER SERVICE AND SATISFACTION



IN THE CURRENT ENVIRONMENT OF UNCERTAINTY AND CHANGES, CUSTOMER EXPERIENCE IS NOW MORE IMPORTANT THAN EVER.

For customers, who have increased needs for constant connectivity, every experience matters, while their interactions are mixed between digital and physical touchpoints. COSMOTE continuously maintains high priority to fulfil customer requests and provide solutions fast, with a high degree of automation and self-service, through the adoption of responsible practices, as well as with an ongoing open dialogue with customers, building a trustful, loyal and long-lasting relationship with its customers.

During 2022, COSMOTE continued to place into highest priority the customer experience and loyalty. For this reason, it systematically collected customer feedback and deployed improvements in products, journeys and channels and grew its digital tools for customer self-support.

Specifically, the volume of customers that use mobile application grew by 11% on annual basis while customers' satisfaction

rating remained in high levels, with over 4,5 stars in both Android and Apple application stores. COSMOTE customers continued to take advantage of the digital capabilities offered, such as accessing and paying their bills online, renewing their prepaid balance, activating packages and services, managing fixed services' router and technical issues, discovering news and offers, as well as renewing their tariff plans. COSMOTE App

and COSMOTE website transactions increased compared to 2021 with total bill e-payments by 14%, and e-sales transactions by 57%, indicating a growing consumer trust and willingness to use COSMOTE digital self-service channels.

To further promote customer loyalty and

satisfaction, throughout 2022, multiple reward and recovery initiatives took place, offering customers free voice minutes, data or TV day passes and BOX discount coupons via COSMOTE and What's Up applications or automatically. Moreover, COSMOTE continued the established policy of offering free mobile

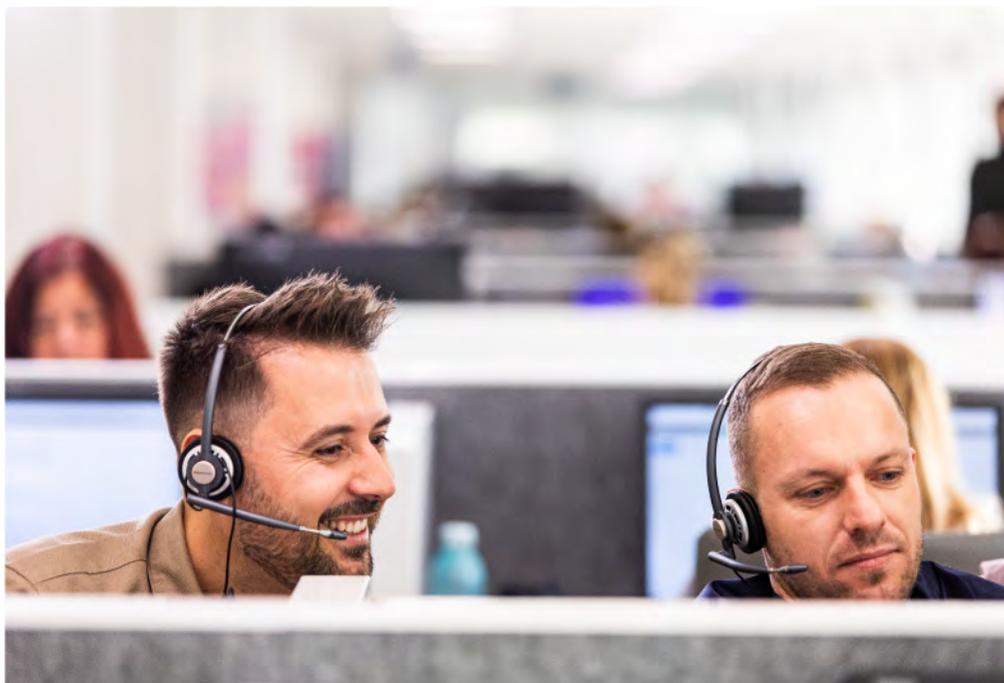
2.2 CUSTOMERS | 2.2.5 CUSTOMER SERVICE AND SATISFACTION

data and voice bundles to customers affected by natural disasters such as earthquakes, floods and wildfires aiming to facilitate their connectivity and support them during difficult times.

COSMOTE's competent teams work towards its vision to improve customers' lives, and ensure a best-in-class user experience, with high quality products, transparent pricing and improved real-time customer support via digital and physical channels.

Updates in My COSMOTE App via new or improved capabilities, such as:

- The "Contract expiry", where COSMOTE customers can easily identify the expiry date of their contracts and make an informed decision on whether renewing or changing their plan, which can also be managed through the App. This feature has been well received by customers, as it proactively informs them on the expiry and eliminates the need to manually check their contracts.
- The "New digital shop experience", which allows customers to easily access, browse and purchase the products and services offered, on a user-friendly environment.
- The "Order status", which allows customers to track the status of their orders real-time, with ease and convenience.



- The "Login with Biometric", which allows users to easily and securely access their account, through biometric parameters, such as the fingertip or face recognition. This feature has received positive feedback from customers as it enhances the security and convenient access of the app.
- The "Bill Clarity and Bill Issue Management", which involved the redesigned bill section in My COSMOTE to improve bill transparency and display the cost of bill in real-time, while facilitating the bill settlement and reducing customer

- enquiries and disputes. Additionally, new self-care capabilities are now available, such as payment due date extension (payment promise), line reconnection after suspension, payment settlements activation and monitoring, acquisition of basic Internet access after suspension etc.
- The "Fault Management", which allows users to perform individual fault checks and end-to-end fault management and resolution of no signal and no synchronization. The development of self-care capabilities is one of the

cornerstones in the Fault-to-repair program. In 2022, over 20% of individual Internet no sync faults and more than 20% of individual telephony no signal faults were reported via the mobile App.

- The "Help and Support Section", which was enhanced with a search engine and a list of solutions for users' enquiries, directing them to the self-care capabilities of the App, such as video content, weblinks or text screens. Finally, frequently asked questions' (FAQs) knowledge was added, while the chatbot entry-point was also redesigned.

Moreover, COSMOTE continued to run customer experience and loyalty programs that drive transformation in both culture and process improvements such as;

- In 2022 COSMOTE operationalized its "**Voice of the Customer Program**", which is based on a survey platform that captures customer feedback not only on transactions and journeys, but also in regard to relationship and product experience. In addition to capturing metrics of NPS (Net Promoter Score), Effort Score and Customer Satisfaction, we established a process of calling back customers with high dissatisfaction level (detractors) in order to dive deeper into customers' story and further identify Customer Experience (CX) pain points. The improvement actions

2.2 CUSTOMERS | 2.2.5 CUSTOMER SERVICE AND SATISFACTION

of **customer journeys'** management contributed in increasing customer satisfaction and reducing their effort.

- The **Customer Experience Ambassadors** continued to actively participate in the product development process effectively representing customers. With 1,300 participations in user-friendly tests and design workshops, COSMOTE's talented employees contributed to achieving product experience excellence. The success of this culture transformation program is reflected in its high NPS of 90 points.
- The "**COSMOTE DEALS for YOU**" program, which includes a platform that offers exclusive privileges and offers for third party leading brands to COSMOTE customers, contributed significantly to the increase of customer loyalty and satisfaction. In 2022, COSMOTE increased the number of unique users (customers) who have benefited from COSMOTE DEALS for YOU offers and additionally increased the amount of partnerships of the program, as well as the respective benefits for COSMOTE customers.
- **Gesture communication gifts** as well as the **recovery communication gifts** were provided to Group customers in 2022, 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. **COSMOTE rewarded its customers** by offering **free GBs** in many occasions, such as contract anniversary, contract renewal and many other. **DATA ME NOW**, a customer-driven self-care gift, was highly used via My COSMOTE App at the times that customers needed unlimited GB. Aiming to support customers even during difficult times, the recovery communication gifts were provided to approximately 300,000 customers affected by natural disasters.

Handling of Complaints and Requests

Driven by the Group's commitment to challenge the way it operates and strive in the direction of improving customer experience, the Group achieved the re-organization of its complaint management structure. The Group's purpose was to eliminate the multiple levels of request handling, thus aiming to reduce the end-to-end (e2e) management of complaints to the shortest possible time. In 2022, 66% of the complains were resolved in the same day. 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 requests are constantly changing, creating the need for a faster, easier, simpler and above all more personalized 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 (First Contact Resolution FCR) 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 2022, 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. It is installed in all customer service channels, such as

call centers, My COSMOTE App and physical 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 service.

- **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.
- **Video call in sign language via portal**. The customer service team personalizes its contacts through the 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 Home Connect**, where 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 Home Connect is continuously growing in order to provide state-of-the-art support and best internet special solutions and mesh networks.

2.2 CUSTOMERS | 2.2.5 CUSTOMER SERVICE AND SATISFACTION

- **COSMOTE UFixIt**, where 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.
- **A 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).
- **A social media team**, dedicated to manage all customer comments that are posted on the social media accounts (Facebook, Twitter, Instagram, LinkedIn etc.) of the Group's companies.
- **Just Digital**, where a Customer Care (CC) Agent may send an SMS to customers, containing a deep link and a brief description of the self-care action they need to perform. Selecting the link takes them to the webpage or the App, where they can complete their request. Over 180 use cases are already available
- **Voice Of Customer Journey**, where the insights collected from customer contacts with the detractors, through a dedicated team, help to determine the requirements,

GREECE
HIGHLIGHTS 2022



Automated Speech Recognition (ASR)

The OTE-COSMOTE Customer Care Interactive Voice Response (IVR) applications were merged 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 2022, more than 30 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, aiming to educate them on how to use the features of My COSMOTE App, as well as the COSMOTE webpage. In 2022, more than 120 self-service cases have been recorded (instructions, deep links, back end integrations etc.).

RVM (Resolution Verification Mechanism)

Enriched the monitoring mechanism for the performance of a landline in order to detect any irregularities and trigger proactive and preemptive actions, not only in faults but also in activations.

YouTube

Provided meaningful, effective and easy-to-understand guidance to customers through YouTube videos, to address their needs and resolve their inquiries. In 2022, COSMOTE's Hints & Tips playlist reached more than 1.25m views.

Digital On Boarding

Enriched with new order types, the functionality 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) takes place online through this feature, thus offers an integrated and fully digital experience. In 2022, the usage of this feature reached 70% of total number of requests.

Customer Identification Process and OTP Authentication

Introduced a mechanism for the authentication and identification of incoming calls, through Interactive Voice Response (IVR) based in a series of automatic checks. With this first we ensure the connection between the caller and the asset and second that the call isn't spoof. With this functionality we reduce the customer's service time.

ROMANIA
HIGHLIGHTS 2022



In 2022, Telekom Romania Mobile continued to deliver on its promise to make offers based on what customers want - Mobile as you want it, simple and fair - by launching a holiday offer with a variety of smartphones included in the price of subscriptions or in low rates starting at €1 per month.

In order to be closer to their loved ones, Telekom Romania Mobile offered its customers smartphones included in Nelimitat 7, 9, 14 or 18 subscriptions, with unlimited benefits (internet, minutes and sms) in Romania and roaming in the European Economic Area. The communication campaign ran under the slogan "How are you?" encouraging Romanians to be closer to their loved ones and make sure they are well.

The company continued its approach launched last year: the same subscriptions for residential (B2C) and business (B2B) customers.

2.2 CUSTOMERS | 2.2.5 CUSTOMER SERVICE AND SATISFACTION

needs, expectations and preferences of the customers. By examining all existing journeys of VOC, emphasis is given to the relationships with customers and the ability to determine the key factors that lead to customer acquisition, satisfaction, loyalty and retention, and as a result to business expansion and sustainability.

Customer Surveys

In 2022, COSMOTE continued 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 2022 COSMOTE continued to work on and improved its "Voice of the Customer Program" with the use of the survey platform that captures customer feedback after transactions in call center, stores and technical service customer journeys, and with regards to relationship and product experience. Along with measuring Customer Satisfaction and Effort scores, NPS remains the common KPI across surveys, while highlighting any customer comments so that relevant action can be taken.

Indicatively, in 2022, high scores were achieved on the TRI*M Loyalty Index¹, showcasing strong customer loyalty. Additionally, the high score of 83% was reported answering the question "How would you evaluate the company as to: whether the company makes me feel like I am in good hands?", since the majority of customers responded "Excellent, Very Good or Good".

According to the 2022 Customer Survey Results², 85% of customers in Greece have rated the overall company's performance as Excellent, Very Good or Good. In 2022, based on Voice of the Customer platform, 81% of customers who interacted with Telekom Romania Mobile are Promoters, increasing 5pp vs. previous year. In the same time, 81% of customers interacting with Telekom mentioned that they solved their issue in the first interaction.

2022 CUSTOMER SURVEY RESULTS²

THE OVERALL COMPANY'S PERFORMANCE IS **EXCELLENT, VERY GOOD OR GOOD**



THE COMPANY MAKES YOU FEEL LIKE **YOU ARE IN GOOD HANDS**



AWARDS 2022

COSMOTE RECEIVED:

GOLD AWARD

at the **Sales Excellence Awards** in the category Telesales (13888: One – Stop – Shop)

GOLD AWARD

at the **IMPACT BITE Awards** in the category Best Telecom Application for My COSMOTE App

CUSTOMER SERVICE AWARDS

in the **Best Customer Service Training** and the **Customer Service Organisation of the Year** categories



1. TRI*M Loyalty Survey, designed at an international level, measures and monitors customer loyalty across countries with DT's presence.

2. Results from TRI*M Loyalty Survey 2022, Evaluation of overall performance and evaluation of driver feeling in good hands

- 2.3.1 Overall Social Contribution
- 2.3.2 Digital Inclusion for All
- 2.3.3 Social Initiatives
- 2.3.4 Employee Volunteering

Social Commitment

€3.69m

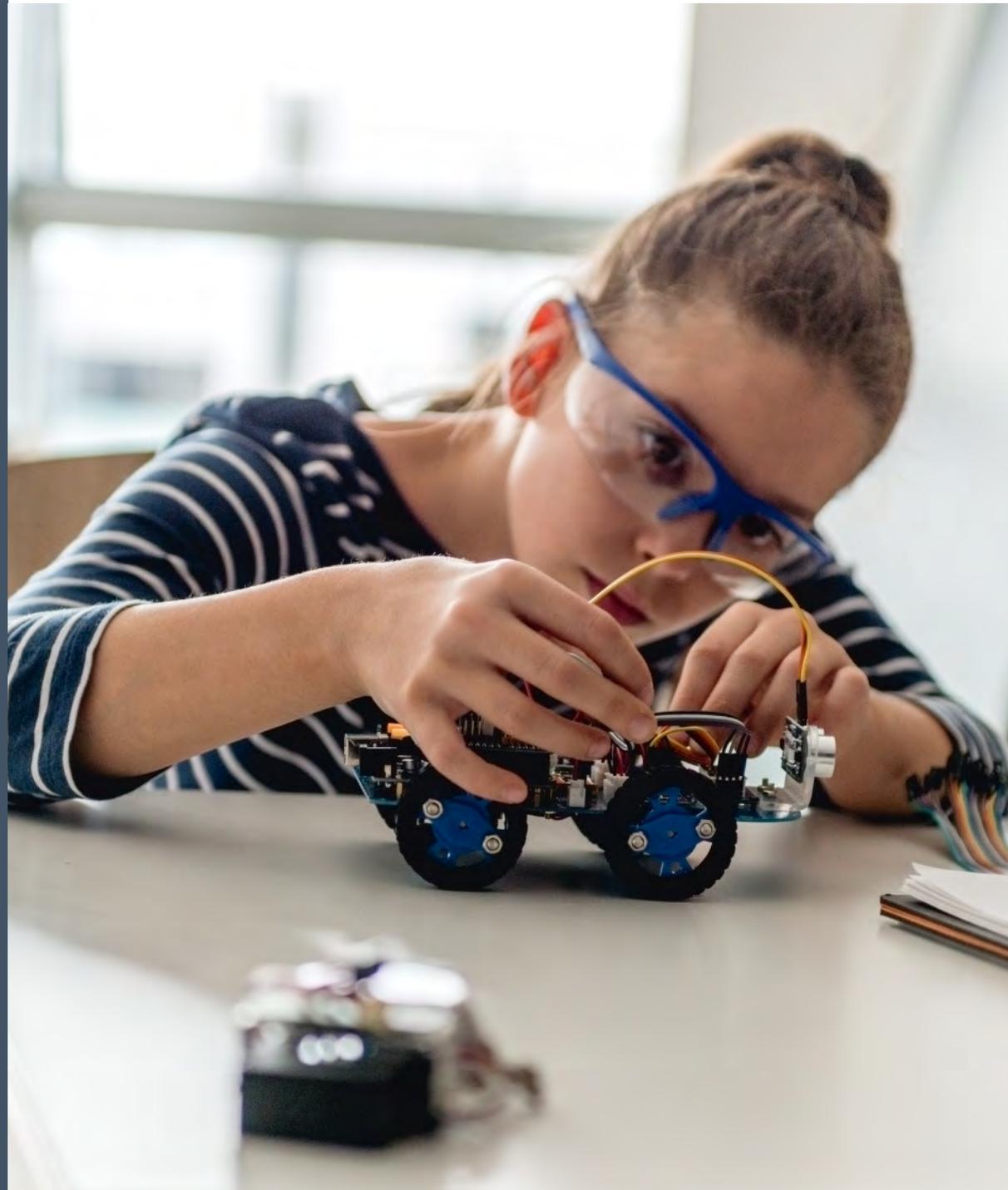
SOCIAL CONTRIBUTION IN 2022

8.2m

BENEFICIARIES

6.7m

OF WHICH, FROM
DIGITAL INCLUSION
INITIATIVES



2.3.1 OVERALL SOCIAL CONTRIBUTION



OTE GROUP CONTRIBUTES TO CREATING A BETTER WORLD FOR ALL, THROUGH THE USE OF TECHNOLOGY

The Group aims to meet core and current social needs through a spectrum of long-term programs and innovative initiatives. It places technology at the center of social contribution by providing essential tools to support an equal and inclusive digital society, while at the same time, promoting societal welfare and improving 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 & Oversight of Social Contribution programs

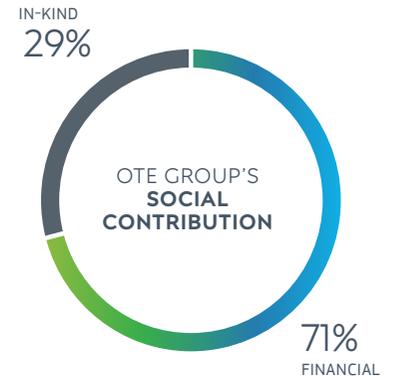
To achieve the optimal management for all of its social programs and initiatives, OTE Group systematically develops internal mechanisms and processes. Indicatively:

- The Chairman and CEO, as well as the Senior Management, oversee the goals and strategy of the Group’s major social activities and are continuously informed about the programs implemented.
- The Chairman and CEO approves all social sponsorships and donations, following the review and approval from the Executive Director Corporate Communications & Sustainability OTE Group and the Executive Director of Compliance, Enterprise Risk Management and Insurance of OTE Group (in Greece) or the Compliance responsible, and Chief Human Resources, Legal and External Affairs Officer (in Romania).
- Systematic dialogue with stakeholders is carried out and new social initiatives are proposed after taking into consideration the needs of interested parties. At the same time data is collected to measure and monitor the impact of OTE Group’s programs on society.

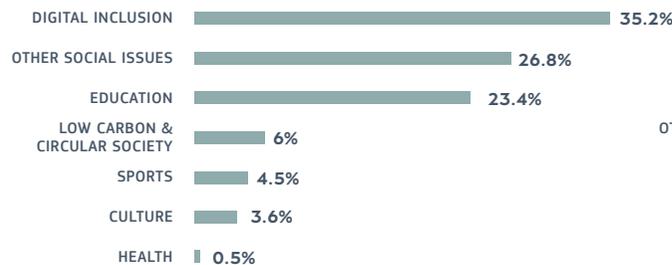
The evaluation of OTE Group’s social contribution is based on the measurement model for inputs, outputs and impacts of the Business for Societal Impact framework (formerly known as LBG). This model is in line and compatible with international standards and initiatives for sustainable development, such as the Dow Jones Sustainability Index (DJSI), the guidelines of the Global Reporting Initiative guidelines (GRI) and the Social Return on Investment methodology (SROI).

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 and improve its future planning.

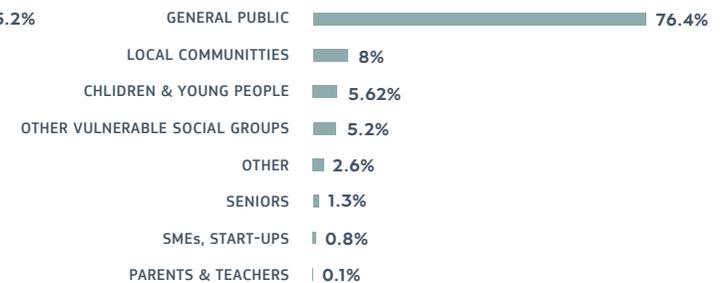
SOCIAL CONTRIBUTION 2022



BY CATEGORY



BY FOCUS GROUP



* 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 and inclusive 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.

The 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 three-fold 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.

With this in mind, the Group designs and implements initiatives catered to people of all ages and socio-economic backgrounds, with the goal to impact ~15 mil. 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 8 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 200,000 children and teachers.

Initiatives and Highlights:

- **National Educational Robotics Competition for kindergarten, primary, junior high and high school students.** After two years of restrictions due to the pandemic, in 2022, 986 teams of students came together to participate in the 2022 National Educational Robotics Competition. In alignment with the theme "Primary Sector – Agricultural Production", they presented innovative ideas and various robotic solutions in different categories of the local and final events, which were attended by 5,500 people.

In the last 8 years, there have been more than 30,000 student participations in the competitions.

- **Train-the-trainers sessions:** Specialized train the trainers sessions and webinars were conducted, 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 8 years, over 8,500 teachers have been trained and the educational material has been downloaded over 4,000 times.

2.3 SOCIAL COMMITMENT | 2.3.2 DIGITAL INCLUSION FOR ALL

- **Equipment and Educational materials:** COSMOTE provides schools with educational robotics kit packages and supports the development and distribution of educational materials by WRO Hellas. COSMOTE, in the last 8 years, has provided approximately 850 educational robotics kits to schools in Greece as well as specialized educational materials related to robotics and programming for teachers and children which has achieved over 4,000 downloads.
- **Junior Engineer Academy (JEA) in Greece:** JEA is an educational program organized by the Deutsche Telekom 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 teacher trainings conducted accordingly in order to deliver engineering - focused lessons to students. The program started in 2020 and was completed in 2022 due to COVID-19, with the participation of more than 1,500 junior high school students in Greece who were trained to improve their skills in subjects such as engineering, physics, and mathematics.

- **STEM training sessions at OTE Group Museum:** The museum conducts STEM

educational workshops for school groups (all grades of elementary and junior high school) as well as for children 6 to 12 years old. In 2022, online and in house STEM training programs were conducted for programming and coding, with the use of Scratch Junior and Scratch 3.0 programs. A total of 650 children 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 produced by COSMOTE. The movies, with over 7 million views, are available on COSMOTE's YouTube channel.



EDUCATIONAL PROGRAMS AND DIGITAL EXPERIENCE IN THE OTE GROUP TELECOMMUNICATIONS MUSEUM



The Museum in 2022 offered in house and online educational programs for school groups and families. The programs for school groups included **guided tours, STEM programs, art workshops and information events about safe internet browsing**. For the second year, 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 **art workshops, educational 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, respective educational **videos on-demand** were available on the Museum's web site for visitors to download and watch whenever they choose.

In 2022, **5,798 people** participated in the Museum's educational programs and guided tours digitally and in-house at the Museum premises, and **170 educational programs were carried out in total** for schools, families and other groups.

#GROWYOURBUSINESS



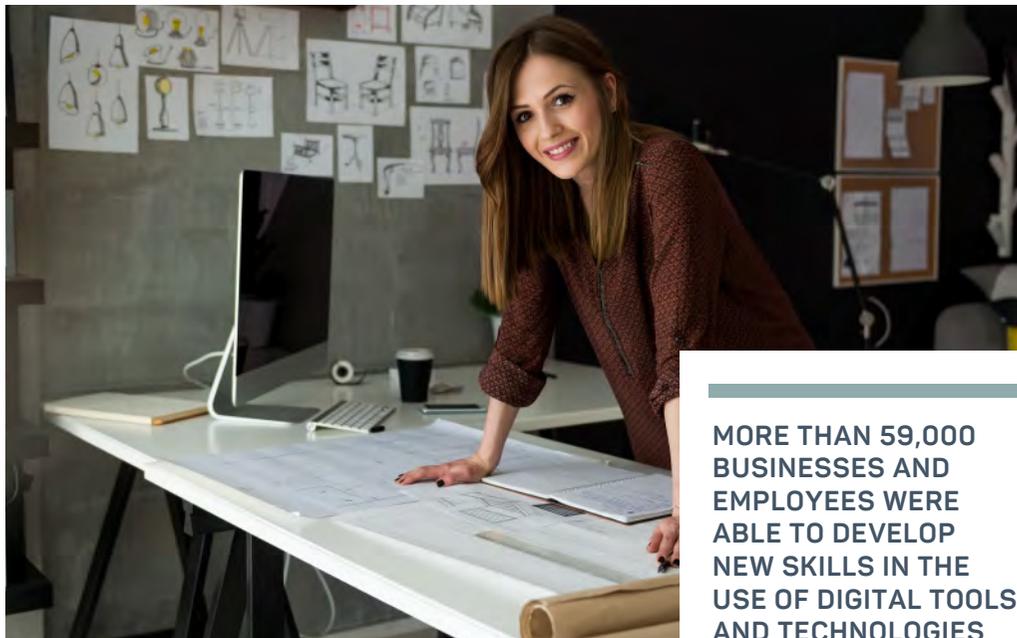
COSMOTE values a world where all businesses are able to grow and take advantage of technological potential and supports the growth of small and medium – sized businesses in the digital era through the #GrowYourBusiness program.

Since 2017, the #GrowYourBusiness initiative has been very popular in the business community, attracting thousands of participants and professionals from different business sectors and cities throughout Greece to participate in daily seminars and workshops.

In 2021, COSMOTE transferred #GrowYourBusiness to the digital environment, enabling everyone to access the free online seminar series #GrowYourBusiness – The Digital Sessions at their own pace, via computer or smartphone.

The seminars are being hosted on COSMOTE’s YouTube channel, aiming to support participants to become acquainted with the tools and tactics that will help their business growth, through the use of technology.

At the same time, each online seminar was followed by a Live "Q&A" session 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 the program, the following digital online seminars were



MORE THAN 59,000 BUSINESSES AND EMPLOYEES WERE ABLE TO DEVELOP NEW SKILLS IN THE USE OF DIGITAL TOOLS AND TECHNOLOGIES

uploaded to the COSMOTE YouTube channel (latest seminar was launched in January 2023):

- Digital Presence
- Digital Marketing
- E-Commerce
- Remote Collaboration
- **Business Organization Digital Solutions**

More than 59,000 businesses and employees were able to develop new skills related to the use of digital tools and technologies, highlighting the initiative’s strong

uptake from the business community.

In October 2022, the current phase of the initiative was launched. In collaboration with the e-Business Research Center (ELTRUN) of the Athens University of Economics and Business (AUEB), the #GrowYourBusiness Certification Program was developed. For the first time, the new free training program is offering Greek SMEs/VSEs, the opportunity to obtain a Training Certificate from the Vocational Training and Lifelong Learning Center (KEVIDIM) of the Athens University of

Economics and Business. The program is designed for all Greek SMEs, their employees and everyone who wants to develop their digital and entrepreneurial skills, as well as to enhance their personal and professional growth.

The #GrowYourBusiness Certification Program is free of charge and is conducted exclusively online. The program consists of 10 thematic courses – with a total of 118 hours of teaching by university professors – and focuses on digital skills in various business operation sectors. The courses include: Digital Skills I & II, eCommerce Plan Development, Logistics & Pricing, Digital Marketing Plan Design, Social Media, Search Engines, Content Marketing, ERP & CRM and Analytics, IoT & AI. The first course started in the beginning of December 2022 and is expected to be completed by July 2023. Participants who attend all the courses will receive a Training Certification from the Vocational Training and Lifelong Learning Center of the Athens University of Economics and Business.

Last but not least, in collaboration with ANT1 TV station, during the channel’s nightly news broadcast, COSMOTE’s small and medium-sized businesses’ clients present their own success stories while showcasing how the digital tools and new technologies contribute to their overall business development.

DIGITALIZATION OF THE “SAFE TOUCHES” PROGRAM BY THE NGO ELIZA



educational material provided on the digital platform.

Support for the launch of the "ELIZA 10454" Help line

In 2022, COSMOTE supported the NGO ELIZA in launching the help line "ELIZA 10454", which provides specialized support and guidance for parents, educators and workers who are close to children, and happen to perceive or suspect that a child is being neglected and/or mentally and physically abused. Callers are offered support and encouragement for the investigation of an incident as well as legal and procedural guidance on proper reporting of alleged incidents of neglect and/or abuse.

"Safe Touches", implemented by the NGO ELIZA, is an innovative program with a nationwide impact for the prevention of abuse of children between the ages of 5-9. In 2021, COSMOTE supported the digitalization of the program, which resulted in the creation of a digital platform that includes informational and educational material to raise awareness on this issue. During 2022, 389 teachers and 590 parents registered and watched the

TELEKOM ROMANIA MOBILE SCHOLARSHIPS



Telekom Romania Mobile continued the support it gives to students with a call for applications to win scholarships in 2022-2023. **Ten students** with exceptional academic results in STEM subjects and an impressive commitment to extracurricular projects and volunteer activities receive a **monthly scholarship** worth RON 3,000 (approximately €600), in the six-month period from January to June 2023.

The program was launched in 2010 and over the years has supported outstanding students with excellent results in their studies. To date, 120 scholarship holders, who are students at prestigious universities in Romania, have benefited from financial support provided by Telekom Romania Mobile.

SPECIALIZED TELECOMMUNICATIONS PRODUCTS, SERVICES & OFFERS

%

People with Disabilities



€630,437 discounts in fixed telephony services were given to people with disabilities, in Greece.

6,378 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 mobile telephony services fee.

Students



What's Up Student offers (mobile offers, double play, mobile internet), fully cover the needs of students, with innovative and exceptionally competitive services.

WHATSUPIA - Free Data at Universities:

The service offers free data to all What's Up Student subscribers, while they are in the campus. The service is available exclusively from What's Up app, it is GPS enabled and is offered to 140 locations in 64 cities all over Greece. Since its launch in November 2022, approximately 60,000 users have benefited from this service by enjoying free data while at University.

OTHER VULNERABLE GROUPS



A special discount is offered to phone card devices of Correctional Facilities in Greece in addition to 3,000 pre-paid telephone cards with a total value of over €120,000 which were donated to Correctional Facility inmates in 2022.

DIGITAL CARE II PROGRAM

COSMOTE and GERMANOS actively supported the "Digital Care II" program, which offered a €200 subsidy to teachers, pupils and university students from Greece's fire-affected areas to be used for the purchase of a tablet or laptop. The program aims to contribute to the strengthening of the digital skills of young people and at the same time to the digital transformation of educational processes. Additionally, beneficiaries who purchased their tablet or laptop at COSMOTE or GERMANOS also got free 12GB COSMOTE Mobile Internet for 1 year. 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.

Over 854 PCs have been donated to more than 745 schools, through the "PC Donation Program", running continuously for 16 years. Apart from making a social contribution, this action also supports 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



3,445,681

CALLS WERE RECEIVED THROUGH THE EUROPEAN EMERGENCY NUMBER 112

of which

132,399

WERE RE-DIRECTED TO THE EMERGENCY NUMBERS 100, 199, 166, 108, 197 AND 1056

FACILITATION OF COMMUNICATION IN EMERGENCY SITUATIONS



In 2022, COSMOTE retained its strategy to **support customers communicate at the times they need it due to critical events and disasters**. Upon Ukraine war, fires, earthquakes and extreme weather conditions like snow or floods temporary initiatives were established to help customers communicate and use mobile internet, 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:

- Due to war, COSMOTE provided free international calls from Greece to Ukraine and free roaming packages to customers who were in Ukraine from 24/2 till 30/5.
- Customers in Greece who were affected by fires (Peloponnese, Samos, Evia, Attica, Megara, Lesvos, Evros, Thasos, Peramos) and extreme weather (Crete, Attica, Evia, Kalymnos, Skyros) received the above benefits.

At the same time OTE Group's technical teams worked intensively to restore the technical issues caused.

DIGITAL INCLUSION IN LOCAL COMMUNITIES

In 2022, COSMOTE supported a wide range of digital inclusion initiatives for local communities, including the coverage of 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 specific needs of municipalities.

MISSING ALERT APP



The "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'** (23 years of support).
- **European Hotline 116000** for missing children, 'The Smile of the Child' (13 years of support).
- **European Helpline for Children 116111**, 'The Smile of the Child'.
- **National Hotline for Missing Adults 1017. 197,548 calls in total.**
- **11525 Advice Helpline** 'Together for Children' (12 years of support). **>3,000 calls.**

TELECOMMUNICATION PRODUCTS AND SERVICES FOR "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 affected children.

CHILDREN'S SECURITY IN THE ONLINE ENVIRONMENT



Telekom Romania 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.

SAFER INTERNET FOR SENIORS 2022-2023



Telekom Romania Mobile is committed to the Group mission of ensuring that everyone takes part in the digital society. Everybody should have access to the multifaceted opportunities afforded by digitalization. In this framework, Telekom Romania Mobile implemented the "Online, being informed is being protected" campaign for safe internet usage of the internet by seniors. It aims at offering educational digital pills for seniors: short video tutorials to be published on Youtube, Facebook, and LinkedIn targeted to reach audiences aged over 55 years.

Topics:

1. Password and data safety (personal information shared on unknown websites).
2. Clicking links (email, messages) and safe downloads.
3. Identify and avoid scams.
4. Online health and wellbeing information.
5. Fake news.
6. Being mobile savvy (sharing content/information, permissions given to Apps, share location, etc.).

Additionally, seminars are held with participants at centers for seniors belonging to DGASPC (General Directorate of Social Assistance and Child Protection) in Bucharest. The campaign was developed in 2022 and it will be deployed online, in social media, and on-site in 2023.

EXECUTIVE COALITION FOR CHILDREN

Telekom Romania 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 Romania Mobile.

#WHATWEVALUE CAMPAIGN IN ROMANIA, PART OF DEUTSCHE TELEKOM'S GLOBAL CAMPAIGN



Deutsche Telekom developed **#WhatWeValue**, a free-to-access global digital platform where socially engaged Gen Z communities could connect, learn from experienced social action leaders, amplify their own volunteer projects, discover opportunities, and have the chance to access additional personalized and individualized support from Telekom. The platform uses NFT technology to turn digital connectivity into real value.

The **#WhatWeValue** Campaign 2022 was deployed in Romania and targeted individuals between the ages of 18 and 30 who were socially engaged and could present their social projects in the areas of environment, mental health and wellbeing, animal welfare, migration, education, and equality. DT developed a dedicated App (whatwevalue.telekom.com) for project enrolment and casting votes.

Each month, two winners were selected on the basis of the votes cast on the platform. In July 2022, the Aluziva Association from Romania won first place and is receiving financial aid in the amount of €35,000 to implement its project. The aim of the organization is to support disadvantaged communities, especially mothers and children from vulnerable backgrounds, education in rural areas, and any other causes that cannot change the world, but can change someone's life. They intend to build libraries in some disadvantaged areas of Romania.

Over 2.5m unique viewers were reached through the digital media campaign and more than 417,000 unique viewers from Romania accessed the WWV platform:

<https://whatwevalue.telekom.com/ro-RO/>.



DIGITAL MEDIA CAMPAIGN
UNIQUE VIEWERS

>2,500,000

WEB PLATFORM UNIQUE VISITORS
FROM ROMANIA

417,000

FREE WI-FI IN ARCHAEOLOGICAL SITES



As a result of the partnership between COSMOTE and the Ministry of Culture and Sports, free Wi-Fi is available at significant archaeological sites and museums in Greece.

With the extension of the memorandum of cooperation between the two parties, a total of 25 sites of significant cultural and historical interest have been selected by the Ministry of Culture and Sports.

This partnership enables visitors to easily search for information about the monuments, to share their experience through the internet and social networks, and for the relevant cultural institutions to develop new ways of guiding and hosting the public.

COSMOTE already offers free broadband services at 18 sites of cultural interest, while continuing with the creation of infrastructure at the remaining sites, with the company's total investment exceeding €3m.

In 2022, OTE Group expanded the free Wi-Fi coverage in the following archaeological sites:

- New Archeological Museum of Chania.
- Archeological site of Akrotiri (expansion of coverage).
- Archeological site of Spinalonga (expansion of coverage).
- Archeological site of Delos (expansion of coverage).
- Archeological site of Acropolis (expansion of coverage).

Within 2023, 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 site of Lindos.
- Archeological site of Palamidi.
- Archeological site and Museum of Mistra.
- Archeological site of Acropolis (expansion of coverage at Ancient Agora).



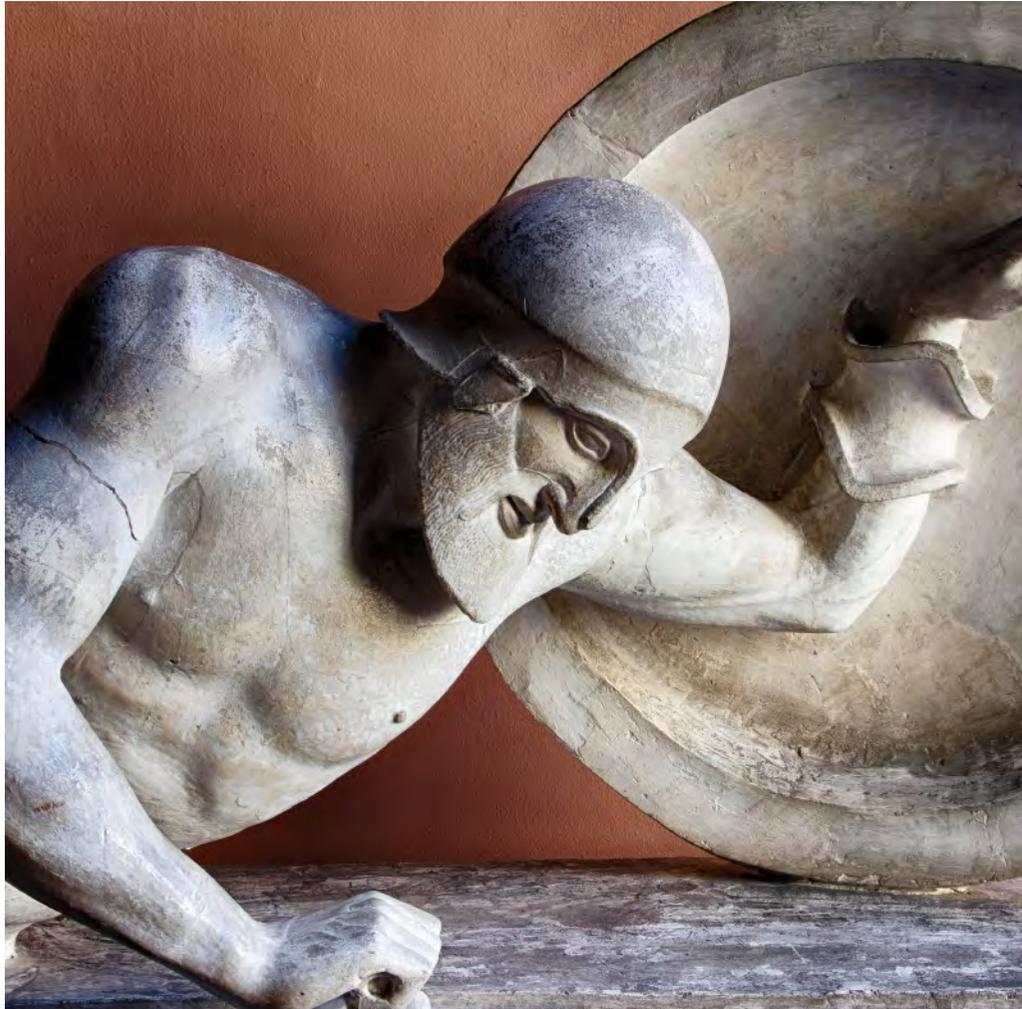
FREE WI-FI IN THE NATIONAL GALLERY OF ATHENS



In addition to the Free Wi-Fi 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 media, as well as to enable the relevant cultural institutions to develop new ways for guided tours and visitors' hospitality.

In 2022, OTE Group provided free Wi-Fi access to the newly renovated National Gallery of Athens, with more than 180,000 visitors annually.

COSMOTE HISTORY HD



COSMOTE HISTORY is the most popular documentary channel of COSMOTE TV, promoting Greek history, culture, religion and science. The Group's vision for **COSMOTE HISTORY** is to be a reference point for entertainment and education.



2022 was a special year for Greece and COSMOTE HISTORY helped to commemorate 100 years since the Asia Minor Catastrophe with 18 documentary films and docu-series about the tragic events of the time.

The channel offers:

>160 original documentaries and docuseries (own productions and co-productions).

>1,000 documentaries signed by acclaimed Greek and foreign creators.

The content consists mainly of:

- Own Productions and co-productions dealing with the Greek legacy.
- Documentaries from international TV networks and distributors, like BBC, Arte, A&E, TVF, etc.
- Documentaries from Greek cultural institutions and foundations, independent Greek producers, etc.

Moreover, following the Group's vision to provide an alternative educational platform, COSMOTE offers COSMOTE HISTORY's programs for free to schools all over Greece.

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 **18 charitable organizations** that provide care for children in Greece.

3 OF THE ORGANIZATIONS

derived from the internal voting process among OTE Group employees.

~€9.5M

have been offered to **over 65 NGOs**, over the past 22 years.

LOCAL COMMUNITIES' ACTIONS

OTE Group supported approximately

78 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 2022, OTE Group along with the non-profit organization "Pediatric Trauma Care", contributed to the medical equipment of two hospitals' children units in the Greek region.

>€600,000

have been allocated for the purchase of medical equipment, supporting **22 hospital units** for children nationwide over the last **11 years**, helping

~100,000

children every year.

DONATIONS BY TEXT MESSAGE



Telekom Romania 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, which is managed by Asociația pentru Relații Comunitare.

SUPPORTING THE HELLENIC NATIONAL DEFENSE GENERAL STAFF



COSMOTE donated 60 brand new laptops valued at

€38,000

to the Hellenic Army General Staff for the coverage of the academic needs of the Hellenic Army Academy (SSE) freshmen Cadets. This initiative falls under COSMOTE's actions for supporting the work of the Greek Armed Forces by providing essential technological tools that secure equitable access to the digital society.

COSMOTE 2022 SCHOLARSHIP PROGRAM



€508,750

was awarded to 30 first-year university students with financial and social difficulties. Additionally, the scholars were offered a complete package of telecommunications products and services, including fixed line mobile, internet throughout their studies, and COSMOTE TV for free.

Specifically, for the academic year 2021-2022, COSMOTE offered **29 scholarships of €15,000 and €18,750**, out of which:

- 16 Scholarships of €15,000 were awarded to first-year students pursuing a 4-year degree program.
- 13 Scholarships of €18,750 were awarded to first-year students pursuing 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 the context of the 20th anniversary of the COSMOTE Scholarship Program, 20 scholarship holders gained valuable work experience through their paid internships at OTE Group in the summer of 2022. These university students had the opportunity to participate in demanding projects, receive detailed feedback on their work and enrich their knowledge of new technologies by working in various sectors of the Group, such as the IT Innovation Center, Network Management Center, IT Security, ICT, etc.

>€7.5M HAVE BEEN AWARDED TO 784 UNIVERSITY STUDENTS

IN THE 21 YEARS THAT THE PROGRAM HAS BEEN RUNNING

2.3.4 EMPLOYEE VOLUNTEERING

EMPLOYEE VOLUNTEERING AND PARTICIPATION IN SUSTAINABILITY INITIATIVES FORM A MAJOR PART OF THE GROUP'S OVERALL SOCIAL CONTRIBUTION.

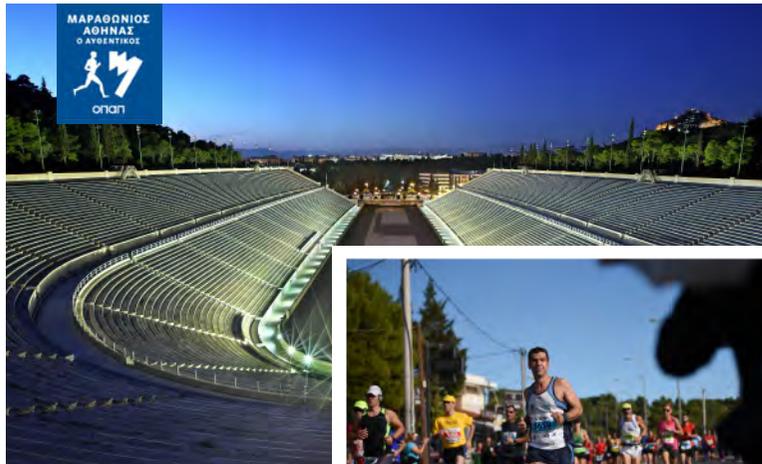
This also offers to employees the opportunity to actively express their support towards society.



>1,500

EMPLOYEE PARTICIPATIONS IN SOCIAL CONTRIBUTION INITIATIVES

ATHENS AUTHENTIC MARATHON



In 2022, more than 550 employees participated in the Athens Authentic Marathon promoting the message of "Running for a better world for all". The OTE Group sponsored the runners and raised money according to the kilometers they ran, with the aim of supporting the following NGOs:

Margarita VTC: to buy equipment for people with intellectual disabilities.

Life Evolution: to help young people which grow up child protection institutes to strength their professional identity and self-empowerment.

Emphasis Foundation: to cover the costs of mobile internet provision in the 4 mobile homeless support units. The provision of this service can cover the needs of job search, access to digital government services, information and entertainment of approximately 1,000 homeless beneficiaries yearly.

COLLECTION OF FOOD & CHILDREN'S BOOKS



Employees from all over Greece, in cooperation with the "Food Bank", collected food which was distributed to soup kitchens and families in need. Also, in partnership with the "Library 4 all", the employees collected children's books to support the libraries of primary schools.



BLOOD DONATION PROGRAM



The Blood Donation Program of OTE Group in Greece has been running for more than 46 years and has since become a part of the Group's culture. In 2022, a total of **1,382 units of blood** were collected from OTE Group employees. 435 units were made available to meet the needs of employees and their families, while the remaining 947 were given to cover social needs throughout Greece. Since 1976, OTE Group has collected more than 33,214 units of blood.



1,382
UNITS COLLECTED IN 2022

>33,214
IN THE LAST 46 YEARS

BONE MARROW DONATION



COSMOTE in collaboration with the NGO "Choose Life" and the University of Patra's program "KEDMOP - Give life" created a program where employees can donate bone marrow and give hope to people in need of a transplant. The program ran throughout 2022 with a call-to-action campaign, and employees were encouraged to visit the company's buildings and participate in the bone marrow program. In 2022, 60 COSMOTE employees made a bone marrow donation. Since the launch of the initiative, more than 627 COSMOTE employees have contributed to this remarkable effort with their donation.



60
DONATIONS IN 2022

>627
EMPLOYEES SINCE LAUNCH



In this section:

- 3.1 Corporate Governance Structure and Members
- 3.2 Board of Directors
- 3.3 Audit Committee
- 3.4 Remuneration and Nomination Committee
- 3.5 Compliance, Enterprise, Risks and Corporate Governance Committee
- 3.6 Sustainability Governance
- 3.7 Enterprise Risk Management
- 3.8 Compliance Management
- 3.9 Human Rights Management
- 3.10 Responsible Purchasing and Supply Chain Management
- 3.11 Business Security and Data Privacy
- 3.12 Business Continuity
- 3.13 Integrated Management System

Governance

1st 1,480 0

COMPANY IN GREECE
RECOGNIZED AS ONE
OF "WORLD'S MOST
ETHICAL COMPANIES"

INTEGRITY CHECKS
OF SUPPLIERS,
CONSULTANTS
AND PARTNERS

COURT CONVICTIONS
FOR CORRUPTION
ISSUES

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 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 2022 (which is included in the **Annual Financial Report for 2022**).

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.

Meet the Board of Directors (31 December 2022)



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).



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



Dimitrios Georgoutsos

Member

Independent
Non-executive member

TENURE: 2019-2024 NATIONALITY: Greek

BOARD COMMITTEES::

- Audit Committee.

3. GOVERNANCE | 3.1 CORPORATE GOVERNANCE STRUCTURE AND MEMBERS

**Grigorios Zarifopoulos**

Member

Non-executive member

TENURE: 2021-2024
NATIONALITY: Greek**Daniel Daub**

Member

Non-executive member

TENURE: 2022-2024
NATIONALITY: German**Melinda Szabo**

Member

Non-executive member

TENURE: 2022-2024
NATIONALITY: Hungarian**Konstantinos Gkravas**

Member

Independent non-executive member

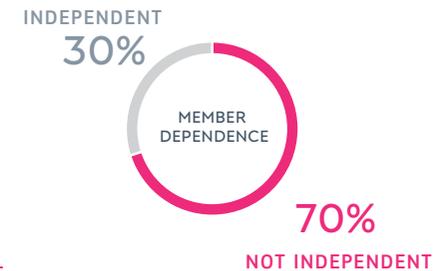
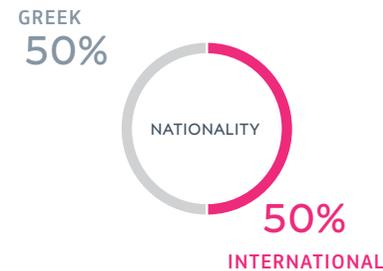
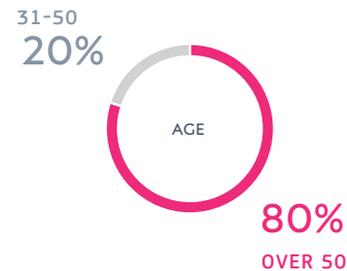
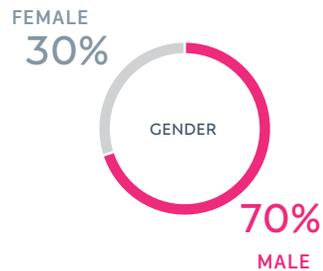
TENURE: 2022-Until next GSM
NATIONALITY: Greek

BOARD COMMITTEES:

- Audit Committee
- Remuneration & Nomination Committee



The full CV's of the current members of the Board of Directors can be found in the [Annual Financial Report 2022](#) and on the Company's [website](#).

BOARD OF DIRECTORS
IN NUMBERS

Meet the Management Team (31 December 2022)**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**Irimi 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**Executive Director
COSMOTE TV**Deppie Tzimea**OTE Group Executive Director
Corporate Communications
and Sustainability

3. GOVERNANCE | 3.1 CORPORATE GOVERNANCE STRUCTURE AND MEMBERS

**Konstantinos Vasilopoulos**OTE Group Executive Director
Internal AuditMANAGEMENT TEAM
IN NUMBERS**Aristodimos Dimitriadis**OTE Group Executive Director
Compliance, ERM and Insurance

FEMALE

21%



GENDER

79%

MALE

31-50

14%



AGE

86%

OVER 50



The full CV's of the current members of the Management Team can be found in the [Annual Financial Report 2022](#) and on the Company's [website](#).

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 2022, 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, in accordance with articles 110-111 of Law 4548/2018.

Furthermore, the General Assembly of 2022 examined the **Remuneration Report for the year 2021**, which the Board of Directors submitted for consultation pursuant to Article 112 of Law 4548/2018.

ESG criteria (e.g. energy consumption and reduction of CO₂ emission), are amongst other performance criteria defined for the provision of the Annual Variable Reward to the Executive Members of the BoD. The variable part of the annual compensation of the executive members of the BoD is the Annual Variable Reward (annual performance bonus or annual short term incentive or special performance bonus) which is related to the set targets, for all levels of employees including the levels of

the positions of the executives in the organizational structure of the Company. The Annual Variable Reward is provided to the Executive Members of the BoD, for the attainment of predefined quantitative and qualitative targets which are related to the performance of the Company, of OTE Group and/or of DT Group, and to the strategic corporate targets. More information is included in the **Annual Financial Report 2022**.

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

3. GOVERNANCE | 3.2 BOARD OF DIRECTORS

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.

Board of Directors – Members and meeting attendance

During 2022 the Board of Directors held twenty two (22) meetings. The attendance of each member of the Board of Directors during 2022, as per the above mentioned, 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	22	21	-
Eelco Blok	22	21	1
Daniel Daub	4*	3	-
Dominique Leroy	22	16	6
Kyra Orth	22	20	2
Melinda Szabo	4*	3	-
Dimitrios Georgoutsos	22	22	-
Grigorios Zarifopoulos	22	21	1
Konstantinos Gkravas	3*	3	-
Charalampos Mazarakis	22	21	-
Rodrigo Diehl	18	16	2
Robert Hauber	18	12	6
Catherine de Dorlodot	19	18	1



* Including the minutes for their election

3.3 AUDIT COMMITTEE

Overview

The Audit Committee is required to be formed by at least three (3) non-executive members from the Board of Directors. The majority of the members (including the Chairman) should be independent. On 31 December 2022, 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 2022, 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

3. GOVERNANCE | 3.3 AUDIT COMMITTEE

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 2022.

- 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.
- 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 2022 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 2022 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	14	14	-
Dimitrios Georgoutsos	14	14	-
Konstantinos Gkravas	2	2	-
Catherine de Dorlodot	12	12	-

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 aforementioned purpose, are described in its **Regulation of Operations**.

Within the framework of its responsibilities, the Committee during 2022 dealt with issues summarized as follows:

- Approval of the process for the formation of the Succession Plan for the Managing Director and the senior executives of OTE S.A. (i.e. the Chief Executive Officers / CxOs).
- Overview of the Results of the process of (a) Self-Assessment of the Board of Directors and (b) Evaluation of the Effectiveness of the Board of Directors and its Committees, following the decision taken by the Committee in December 2021 to entrust an external consultant with the task of providing advisory support in the

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 2022, which were eleven (11) 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	11	11	-
Kyra Orth	11	10	1
Konstantinos Gkravas	1	1	-
Catherine de Dorlodot	9	8	1

Committee regarding the assessment in question (for the year 2021) – Information to the Board of Directors.

- Procedure for finding candidates to replace two non-executive members of the Board of Directors / Submission of a proposal to the Board of Directors regarding suitable candidates to fill the above positions.

- Procedure for finding a candidate/candidates to replace an independent non-executive member of the Board of Directors, of the Audit Committee and of the Remuneration and Nomination Committee. / Assignment of the task for his/their assessment to an external consultant / Submission of a proposal to



3. GOVERNANCE | 3.4 REMUNERATION AND NOMINATION COMMITTEE

the Board of Directors regarding the suitable candidate to fill the position of the independent non-executive member of the Board of Directors who will also be a member of the Audit Committee and the Remuneration and Nomination Committee.

- Submission of 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).

- Submission of a proposal to the Board of Directors for the revision of the Remuneration Policy for the members of the Board of Directors, in accordance with

articles 110-111 of Law 4548/2018, and respective amendment of the agreement of the Managing Director, executive member of the Board of Directors, which the Board of Directors subsequently submitted for discussion to the 70th Annual General Meeting of Shareholders of 25-5-2022.

- Examination of the annual Remuneration Report which the Board of Directors subsequently submitted for discussion to the 70th Annual General Meeting of Shareholders of 25-5-2022 in accordance with article 112 of law 4548/2018.

3.5 COMPLIANCE, ENTERPRISE RISKS AND CORPORATE GOVERNANCE COMMITTEE

Overview

The 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 competent executives of the Company on Compliance, Enterprise Risks, Corporate Governance and Human Rights issues, considers any relevant issues arising and proposes the issuance of relevant decisions and the adoption of relevant measures.

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.

Members of the Committee are:

- The Executive Director Compliance, Enterprise Risk Management and Insurance OTE Group (Committee's Chairman),



- The General Counsel - Chief Legal and Regulatory Affairs Officer OTE Group,
- The Chief Financial Officer OTE Group,
- The Chief Human Resources Officer OTE Group,
- The Chief Information Technology Officer OTE Group,
- The Executive Director Internal Audit OTE Group (without voting rights),
- The Executive Director Corporate Communications & Sustainability OTE Group,

- The Executive Director Business Security and Continuity OTE Group,
- The Mergers, Acquisitions & Investor Relations Director OTE Group and
- The Data Privacy Officer (DPO) OTE Group.

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, Group-wide sustainability policies in response to important sustainability/ESG issues and significant strategic actions, as well as the annual Integrated Report. Moreover, the BoD monitors the Group's sustainability/ESG performance and the relevant risk management, identifies the Company's stakeholders, depending on its characteristics and strategy, understands their collective interests and how they interact with its strategy, and binds and monitors the executive administration on matters relating to new technologies and environmental issues. In this context, the BoD is regularly informed on sustainability issues. Indicatively, in 2022, the BoD was updated on the strategy, priorities, commitments, performance, strategic actions, important current and future requirements, as well as on the materiality assessment and its results. All of the above, along with the rest of the provisions of the Sustainability Policy, also contribute to the understanding of the stakeholders' priorities

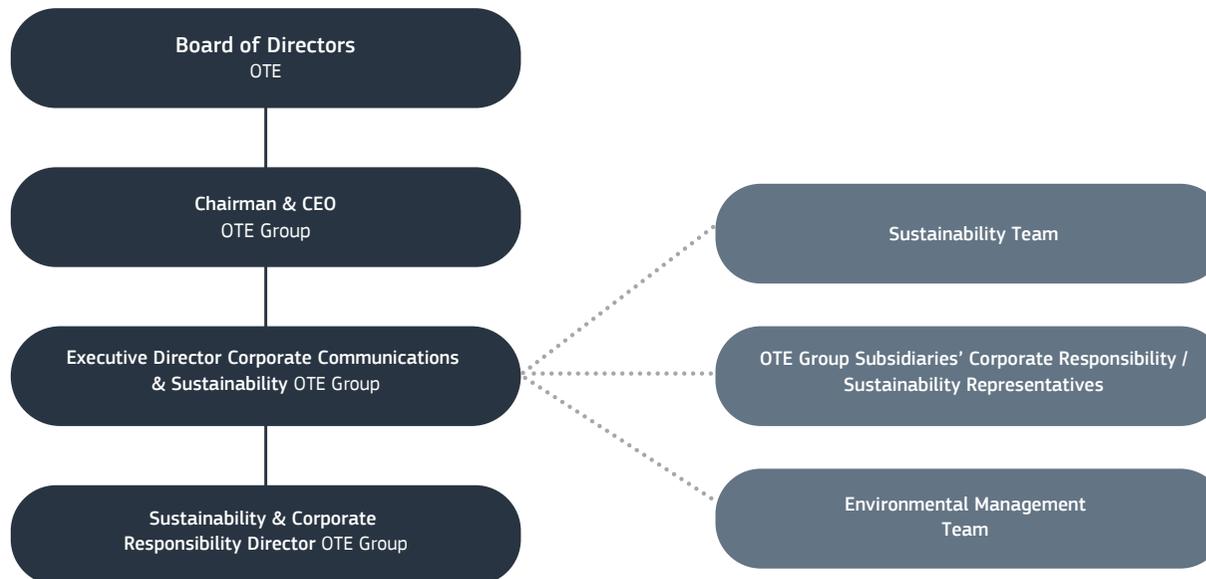
and expectation, so as they are taken into account by the BoD when discussing and making relevant decisions.

The BoD has tasked the Chairman and CEO, the Company's supreme executive body, to ensure the Group's commitment to sustainability. 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 (e.g. 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.

ORGANIZATION STRUCTURE



3. GOVERNANCE | 3.6 SUSTAINABILITY GOVERNANCE

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 sustainability and the ESG criteria in their areas of responsibility and the 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.

ESG Targets in Remuneration

Further promoting sustainability as a key business priority and integrating it into OTE

Group's business strategy, ESG targets are set as a performance-related component of top management's remuneration, as of 2022. Specifically, climate related goals (e.g. energy consumption and reduction of CO2 emissions) are components of the variable part of the annual compensation, giving additional priority to the Group's efforts for climate change mitigation. Other indicative performance-related components of top management's remuneration are the revenues, the EBITDA (financial targets), success factors related to specific products or services, the change management, the modernization / transformation of the Company, the loyalty / satisfaction of the customers and of the employees, the compliance with the guiding principles of corporate behavior and of leadership principles.

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. The objectives of the sustainability team, among others, are 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 actions to the various business units of OTE and to the

affiliates of the OTE Group, as well as the improvement of the Group's sustainability/ ESG performance.

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.

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 & Sustainability 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 of the 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 & Sustainability 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 Selecting, Attracting and Retaining** section.

3.7 ENTERPRISE RISK MANAGEMENT



OTE Group, in order to safeguard the continuous provision of its products and services, has developed enterprise risk management procedures to proactively and timely identify negative or positive, actual or potential risks and impacts associated with its business operations. In this context, the Group can ensure its preparedness and business continuity, take advantage of the opportunities to capitalize on potential risks or disruptions, while maintaining its competitive advantage. A solid risk management approach has a positive impact on the business' overall performance, since it plays a key role in the strategic development and decision-making of the Group. On the other hand, the lack of appropriate risk management can have a negative impact, resulting in high dissatisfaction of stakeholders, especially shareholders and investors, leading to distrust and reputational issues.

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 that 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



3. GOVERNANCE | 3.7 ENTERPRISE RISK MANAGEMENT

deadlines for their implementation.

The Executive Director Compliance, ERM & Insurance OTE Group submits the OTE Group Enterprise Risk Management Report four times a year, to the OTE Group Compliance, Enterprise Risks and Corporate Governance Committee for its evaluation. Following this evaluation, the report is submitted to the Audit Committee and to the OTE Board of Directors.

In the section **Risks and Uncertainties for the Next Year**, a list of OTE Group's identified risks and their respective mitigation practices are presented.

Major achievements in 2022, include:

- Implementation of the 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.
- Certification on ISO 31000:2018 "Risk Management – Guidelines", obtained by OTE, COSMOTE, TKRM, GERMANOS, CTS and for the first time the attestation also concerns COSMOTE e-Value.
- Update 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 first 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 2023.
- Development of the Risk and Opportunity Assessment Tool for business units or

projects according to the common ERM Methodology.

- Submission of four 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.
- Successful 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 for fraud, corruption, illegal acts, and misconduct. This presumes, inter alia, the adherence of employees and business partners to the Group's Code of Conduct, the Supplier Code of Conduct and the Code of Human Rights and Social Principles. Furthermore, in cases where employees are exposed to conflicting interests or loyalty relationships, the Group addresses and ensures the appropriate management of such instances.

principles of integrity, transparency, fairness, professionalism, team spirit as well as respect for the corporate rules. These principles, which are essential to govern the operation of the Group, contribute to the positive impact that the Group has on its employees, business partners, suppliers and society. This involves the promotion of a fair and competitive market resulting from responsible and ethical business practices of the Group, strong relationships with business partners as well as increased employee and stakeholder satisfaction. Furthermore, the Group supports a positive corporate culture and encourages the principles of "speak up" and "listen up" within the workplace. At the same time, the establishment of processes to ensure ethical business conduct, remediates the potential negative impacts associated with misconduct and non-compliance, which could include unfair business practices, increased fines and legal actions from regulatory bodies, reduced profitability and reputational risks.

OTE Group Compliance Policies are approved by the competent corporate bodies of the affiliated companies and are communicated to employees and business partners, through the appropriate communication channels (companies' intranet, website, etc.),

OTE Group's commitment to ethical business practices refers, inter alia, to its approach, policies and initiatives to ensure that the Group safeguards its operations while maintaining high standards of accountability, transparency, integrity and compliance. Ensuring compliance is one of the Group's top priorities. For OTE Group, Compliance stands for commitment to the

COMPLIANCE MANAGEMENT SYSTEM (CMS)

GOVERNANCE

COMPLIANCE RISK ASSESSMENT



AWARENESS & PREVENTION

Policies
Consultation (Ask Me!)
Trainings
Third Party Due Diligence



DETECTION

Tip-Off-Portal (Tell Me!)
Compliance Reviews
Compliance Assessments



RESPONSE

Case Management
Consequence Management
Remediation

REPORTING

COMMUNICATION

CERTIFICATION

available in both English and the local language.

In order to track the effectiveness of the actions taken related to compliance matters, the Group amongst others, has established internal and external review and evaluation

procedures. For example, the annual assessment of the Compliance Management System (CMS Assessment), the certification of management systems, the annual Compliance Risk Assessment (CRA) and the internal audits. In the context of the aforementioned actions, the Group engages

3. GOVERNANCE | 3.8 COMPLIANCE MANAGEMENT

with various internal stakeholders to receive feedback on the procedures, the grievance mechanisms, their effectiveness and the associated corrective measures.

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 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 Code of Conduct 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. 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.



In cases where employees are uncertain on how to handle certain work issues related to the implementation of the organization's policies and practices for responsible business conduct, they may seek advice via the "Ask me" communication channel. This is part of a specific process for handling these inquiries, which has been communicated to all employees of the Group ("Ask me process").

Also, employees and/or third parties (customers, vendors, partners, etc.) may raise concerns about the organization's business conduct via the "Tell me" channels, i.e. reporting (eponymously or anonymously) inappropriate conduct, or any concerns or

complaints about potential violations of corporate policies or current legislation, to the **Compliance communication channels**. In such an event, relevant processes are in place and have been communicated to them ("Tell me process" and "Case Management process") which include plausibility check and, if necessary, investigation of the compliance violation and the implementation of appropriate measures.

Furthermore, in case of a compliance violation by an employee with regards to OTE Group's internal policies is confirmed as a result of the investigation, a disciplinary procedure is initiated and the appropriate measures are decided per case, indicatively:

strict warning letter, removal from position of responsibility, disciplinary fine or employment contract termination, as well as implementation of new controls or revision of existing ones.

All **Codes** and **Policies**, which are mentioned on the company's **website**, are regularly updated to ensure continuous compliance with the 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), by independent Certification Bodies, for OTE, COSMOTE, COSMOTE Technical Services (CTS), COSMOTE e-Value, GERMANOS and Telekom Romania Mobile Communications.

Also, the whistleblowing management system (part of the CMS) applied at OTE, COSMOTE, CTS, COSMOTE e-Value, GERMANOS has been attested according to the international standard ISO 37002:2021 (Whistleblowing Management Systems), by an independent Certification Body.

Moreover, in 2021, a Compliance Management System (CMS) Certification on Anti-Corruption (according to Assurance Standard 980) was obtained by OTE and COSMOTE.

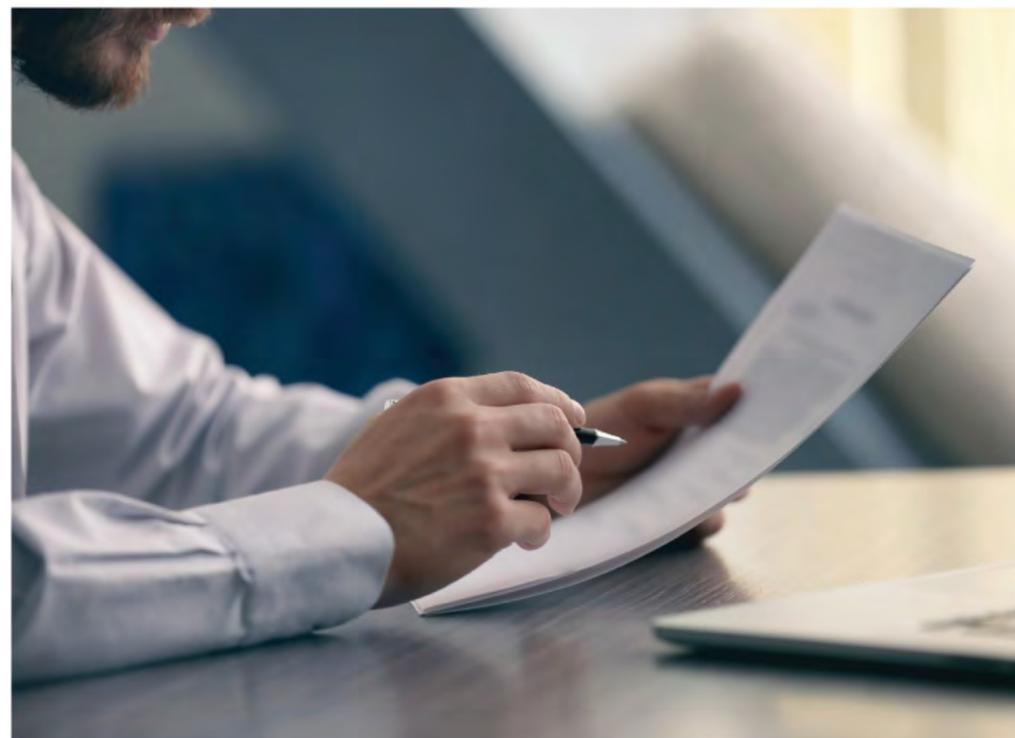
3. GOVERNANCE | 3.8 COMPLIANCE MANAGEMENT

Major achievements in 2022 include:

- A **Compliance Risk Assessment** was conducted along with the OTE Group Materiality Analysis (see "**Materiality Analysis**"). The Chief Officers and Executive Directors' representatives who participated in this analysis represented 100% of the Group functions (15 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 COVID-19 pandemic. As a result, a Compliance Measure Plan for 2023 was drafted.
- **20 Compliance Management System (CMS) Assessments** were conducted at OTE Group companies.
- The **procedure of the Compliance Annual Statements**, i.e. the Conflicts of Interest Statements and the Compliance Statements, 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 Diversity, Equity and Inclusion Policy of 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 or corruption incidents and to human rights violations.
- OTE participated, for the third consecutive year, in the evaluation of Ethisphere Institute's "**World's Most Ethical Companies**" award, where it was recognized as one of the 2023 World's Most Ethical Companies. In 2023, 135 honorees were recognized spanning 19



countries and 46 industries. OTE is the only honoree from Greece and one of the 2 honorees from the telecommunications sector globally. "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 the commitment to advancing business integrity, globally.

- OTE, for the first time, participated in the International Compliance Association (ICA) Awards. These Awards are open to all compliance and financial crime teams – across all industry sectors operating within Europe and recognize and celebrate the outstanding achievements, innovation and collaboration in financial crime and compliance. OTE participated in the "Compliance Team of the Year – Non

3. GOVERNANCE | 3.8 COMPLIANCE MANAGEMENT

Financial Services" category and was one of the eight finalists.

- The Executive Director Compliance, ERM and Insurance OTE Group received the Manager of the Year 2022 award at the category "Ethics and Compliance".
- OTE Group Compliance Department's members **participated in various conferences and events**, including:
 - Online workshops entitled "The Internal Control System: a key to corporate governance", organized by SEV (in cooperation with SEKASE, H.A.R.I.MA and IIA Greece).

- AIIA Forum 2022 "Democratizing the Power of AI", organized by Artificial Intelligence In Action (AIIA): participation in panel on "The strategic landscape of AI and the need of democratization".
- Web-Conference on "Artificial Intelligence and Internet of things, opportunities for small and medium enterprises", organized by Ministry of Digital Governance: participation in panel "Emerging technology solutions available for small and medium enterprises".
- Business Integrity Forum of Transparency International Greece: participation in a) the 11th Round Table

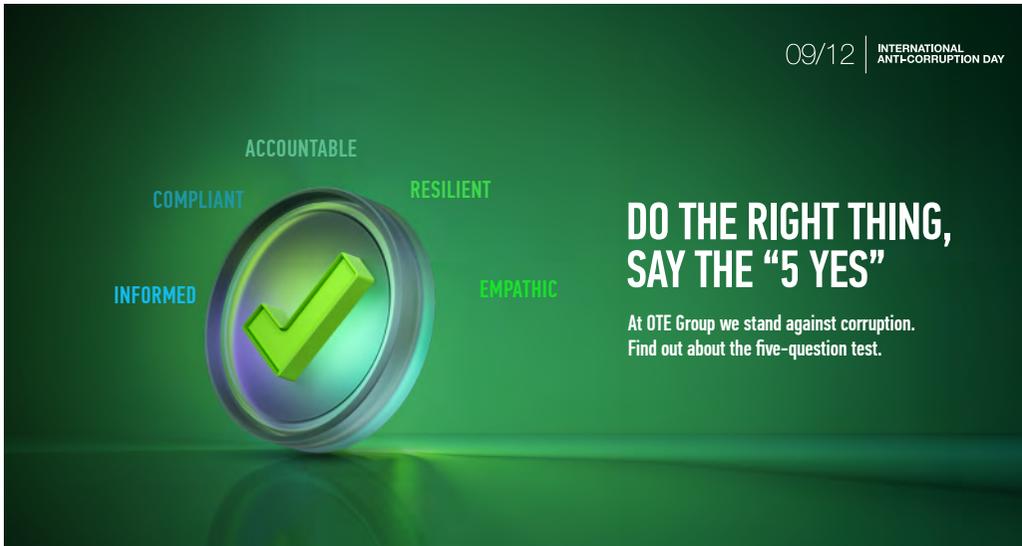
(Webcast) entitled "Contemporary Challenges of Corporate Interest", b) the seminar on "The protection of whistleblowers in the corporate environment" and c) the 12th Round Table entitled "Strengthening the efforts against corruption".

- ACFE Greece Annual Conference "Managing the Business Risk of Fraud: There is a way".
- 5th Compliance Conference "Seeking certainties in uncertain times", organized by Association of Compliance Officers in Greece (ASCO/SEKASE), which included the topic "Shaping the Ethical Corporate Culture".
- Law and Integrity International Days (18-20.5.2022, organized by T-Mobile Polska): the Executive Director Compliance, ERM and Insurance OTE Group, gave a speech on "Compliance Certification Standards", focusing on our experience from ISO 37301 "Compliance Management Systems" certification.

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 Policy on Concluding Transactions with Related Parties" .
 - The "OTE Group Code of Conduct"
- Also:
- GERMANOS, CTS, COSMOTE e-Value, OTE GLOBE and Telekom Romania Mobile Communications (as OTE's primary subsidiaries) have adopted Regulations of Operations, in compliance with the requirements of Law 4706/2020 on Corporate Governance.
 - The "OTE Group Policy on the Prevention and Combating Violence and Harassment in the Workplace" and the "OTE Group Digital Ethics Guidelines on Artificial Intelligence" have been adopted.

- **Four 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



3. GOVERNANCE | 3.8 COMPLIANCE MANAGEMENT

related, but not limited to, sponsoring/ donation approvals, conflicts of interest and accepting/granting of benefits.

- In the context of the **Compliance Training program**, Group employees participated in training seminars (face-to-face and digital) on anti-corruption and other issues, introductory training for new entrants, on-site awareness trainings, and e-learning courses in Greece and Romania.
 - Within the context of our culture of zero tolerance towards bribery and corruption, the governance body members at OTE Group Greece are required to complete (within their term of office), inter alia, online courses that include training on types of anticorruption. Moreover, when a new board member is appointed, an induction training course takes place: in 2022, **one governance body member attended induction training within the first month of its appointment.**
 - **More than 1,500 newly hired employees** in Greece were trained in

2022, as part of the **“Welcome on Board” program** and **“Customer Care induction” program**, which include a specific module on anti-corruption and other compliance issues. More specifically, total number of trained employees in “Welcome on Board” program: 31 (72%), “Customer Care induction” program: 1,475 employees (100%).

- On-site trainings on Compliance topics including the anti-corruption policy (bribery, conflicts of interest types etc.) took place in **GERMANOS owned shops** (COSMOTE shops). Total number of trained employees: 26 (96.30%), managers: 3 (100%). The trainings will continue in 2023.
- **Two e-learning courses, on Compliance Fundamentals and Human Rights**, were rolled out, anew, in 2021 after the spin-offs, and continued in 2022, in order to cover any OTE Group companies’ employees not included in the previous

year. Furthermore, the first e-learning course on **Code of Conduct** was launched in 2022 at Group level and will continue in 2023. Compliance Fundamentals and Code of Conduct e-learning courses provide training on OTE Group Policies with an emphasis on anti-corruption policy (types of corruption, including bribery) and the respective guidance to employees. Indicatively:

- **Compliance Fundamentals: 2,414** employees (including managers) completed training in 2022 (47.41%), 397 managers in Greece.
- **Code of Conduct: 4,732** employees (including managers) completed training in 2022 (47.58 %), 618 managers in Greece.
- A training on compliance issues, including anticorruption policy, to **shop partners/ franchisees** was also rolled out in early October and was completed in 2022 via the training portal **“Sales**



Training”. Of the employees assigned the training: 1,582 completed (participation rate achieved: 91.29%).

- The e-learning course on **Code of Conduct** was launched in 2022 for **TKRM** employees and is currently in progress. Of those assigned the training, 451 employees have already participated (55.13%). An awareness campaign on Conflicts of Interests was also launched.

SIGNIFICANT DATA

2022



- **Fraud incidents and serious violations by employees regarding the OTE Group Code of Human Rights and Social Principles and OTE Group Code of Conduct:**
 - 4 cases occurred, which resulted in the termination of employee contracts
 - 2 cases occurred, for which final disciplinary sanctions were imposed by the competent 1st and 2nd degree disciplinary bodies.
- **No incidents of corruption or bribery** were reported via internal channels in 2022.
- **No incidents of corruption regarding contracts with business partners**, which resulted in the termination of the contract or its non-renewal.
- **One case due to fine imposed by the Competition Committee** occurred concerning two suppliers leading to their exclusion from the 2022 tender procedures.
- **No court convictions for corruption issues** against OTE Group or its employees in relation to their professional activities occurred in 2022.
- **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, in 2022.

383

TIP OFFS/COMPLAINTS

received at the relevant compliance communication channels in 2022,
with an average rate of 17 customers' complaints per month

53

TIP OFFS / COMPLAINTS

12

GENERAL INFORMATION
FROM **THIRD PARTIES**

318

CUSTOMER COMPLAINTS ON
TECHNICAL/COMMERCIAL MATTERS

16

NOT
PLAUSIBLE

33

PLAUSIBLE

4

UNDER
INVESTIGATION

Appropriate measures per case 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 2022, the average time spent on customer complaints was **7 working days** on an annual basis for Greece and approximately **2 days** 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 2022](#).

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 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. Furthermore, 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 and a new Code of Conduct for the provision of electronic communications to the customers. 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, holds Significant Market Power (SMP) 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 hold SMP, OTE's control of retail prices by the HTPC is maintained, as a remedy in

the context of the wholesale markets' regulation. Following a new market analysis for the relevant markets in 2022 by HTPC, OTE will continue to hold SMP and will be subject to regulatory obligations. The draft measures were endorsed by the EC in December 2022 and the decision by HTPC is expected to be published in Q1 2023.

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 2022 refer to relevant actions for OTE, COSMOTE and Telekom Romania Mobile Communications.

With regard to OTE there were zero number of fines, appeals resulting in €0 cost of fines. One non-pecuniary penalty (warning) was imposed upon OTE.

Concerning COSMOTE there were €0 cost of fines, appeals, resulting in 0€ Cost of fines. One non-pecuniary penalty (warning) was imposed upon COSMOTE.

Telekom Romania Mobile Communications reported in the regulatory field 20 fines and 1 non-pecuniary penalty, with the cost of fines amounting to €92,666.

Contribution, Formulation and Operation of a Responsible Market

The new telecommunication technologies are critical for future economic growth, social welfare and sustainability. In this context, 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 on 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



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.

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 in line with the UN Guiding Principles on Business and Human Rights.

In 2018, after the approval of OTE BoD, 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 as set out in: The International Bill of Human Rights (United Nations), The Core Conventions of International Labor Organization (ILO), The OECD Guidelines, The Global Compact of United Nations, The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) and The Guiding Principles on Business and Human Rights (United Nations). It applies and is communicated to all OTE Group employees in all countries of operation (the word "employees", refers to all people who work at the OTE Group: Board members, managing directors, executives, employees,

3. GOVERNANCE | 3.9 HUMAN RIGHTS MANAGEMENT

who offer their services at the OTE Group under any form of contract e.g. full time agreement, independent services agreement, project agreement, retainer fee-mandate). Additionally, 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 and personal responsibility. These rules establish a model of operation and lead to the adoption of a common "Corporate Culture".

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 **Business Security and Data Privacy**).

Particular attention is paid to the rights of its employees, freedom of association and collective bargaining, diversity, inclusion and equal opportunities (see section **Fair Employment and Equal Opportunities** and the **OTE Group Diversity Equity and Inclusion Policy** which was approved by OTE BoD and it applies to all OTE Group employees). The Group declares that it is in favor of banning all forms of forced labor, human trafficking, modern slavery and

strives to abolish child labor. Furthermore, the rights of the Group's customers and local communities are also of high priority.

As an ICT company, OTE Group is committed to abide by and promote human and social rights with regard to responsibilities emerging from technological change and digitalization. To this end, in December 2022 OTE BoD approved the "**Digital Ethics Guidelines on Artificial Intelligence OTE Group**".

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** 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.

The Human Rights Risk and Impact analysis is performed according to the ERM Methodology, and includes the following: 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 conducted for the first time 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 the assessment 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 second Human Rights Risk and Impact analysis was initiated, for all OTE Group Companies, at the end of December 2021 and was finalized during the fourth quarter of 2022. The areas of the assessment were: Adherence to Company Codes and Grievance Mechanisms, Human Rights Management in Business, Fair Employment and Employee Management, Employee Health Safety and Wellness, Responsible Supply Chain, Safe and Responsible Use of Technology and Data Security, Privacy (Customers / Employees), Community

Engagement and Impact, Digital Inclusion, Energy and Climate Change.

Furthermore, in order to ensure compliance with the provisions of the Code of Human Rights and Social Principles and the effectiveness of the respective controls:

- OTE Group companies are surveyed annually via an automated tool. The managing directors or HR managers confirm, by signing the respective Statements, that there were no violations of the Code during 2022.
- The OTE Group Internal Audit Department commenced during the first quarter of 2022, the audit "OTE Group Policies on Avoiding Sexual Harassment, on Human Rights & Social Principles, and on Diversity, Equity and Inclusion" and the results confirmed that sufficient controls are in place and the overall environment generally conforms with the relevant requirements.

Considering that the diffusion of key values and standards in the supply chain is an important feature of responsible business conduct, OTE adopted the **Suppliers Code of Conduct**. Based on OTE Group core values addressing business ethics, social and environmental commitments, OTE Group requires the Supplier to adhere to the

3. GOVERNANCE | 3.9 HUMAN RIGHTS MANAGEMENT



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QUESTIONS RELATED TO DISCRIMINATION ISSUES

were received via the "Ask Me" channels (see [Compliance Management](#)).

28

COMPLAINTS WERE FILED VIA "TELL ME" CHANNELS

regarding allegations for breaches of the Code of Human Rights. Indicatively, twenty-one (21) tip-offs were filled by employees and twenty (20) concerned allegations for employees' improper behaviour. Following relevant investigations by the OTE Group Compliance office, the appropriate procedures were applied.

100%

OF SIGNIFICANT INVESTMENT AGREEMENT/CONTRACTS

that were concluded during 2022 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 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.

Principles listed in the [OTE Group Supplier Code of Conduct](#) and act in accordance with OTE Group Code of Conduct and Code of Human Rights & Social Principles. These Principles are attached to the relevant Contract entered between the Company of OTE Group and the Supplier. The Supplier shall do its utmost to implement these Principles throughout its whole supply chain and all suppliers are asked to respect and safeguard human rights. Moreover, 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 2023. Additionally, Deutsche Telekom participates in the [CFSI initiative](#) (Conflict-Free Sourcing Initiative), to prevent the use of conflict minerals.

Important components of the Group's integrated approach to managing human rights have also been stakeholder

involvement, raising awareness, trainings and participating in respective networks.

In 2022 a new OTE Group's Materiality Analysis was conducted and Human Rights was one of the topics highlighted by the stakeholders, therefore recognising that the responsibility to respect and protect Human Rights should be instilled among the Group's strategic targets and efforts. The Human Rights topic, referred to the integration of human rights management practices throughout the strategy and all aspects of

an organization. The following aspects are included:

- Understanding and assessing human rights impacts that can result through the Group's actions and operations, as well as through its interactions and relationships with its stakeholders, including governments, local communities and suppliers, and its investments.
- Facilitation of accessibility (people with disabilities) in Group's properties.

3. GOVERNANCE | 3.9 HUMAN RIGHTS MANAGEMENT

- Human rights due diligence.
- Policy commitments with respect to human rights.
- Human rights are considered in significant investment decisions (e.g. mergers and acquisitions) and contracts.
- Recognition of the importance of Freedom of Expression which encompasses the freedom to seek, receive and impart information and ideas through any media and regardless of frontiers. Companies respect and protect the freedom of expression of their users by seeking to avoid or minimize the impact of government restrictions on freedom of expression, except in narrowly defined circumstances based on internationally recognized standards and principles.

In May 2022 an awareness webinar was conducted, open to all OTE Group employees, regarding the new Policy on "**Prevention and Combatting Violence and harassment in**

the workplace" which was adopted in May 2022 in the context of the law 4808/2021 and it applies to all OTE Group employees.

The Training Catalogue for 2022 includes a chapter related to Diversity, Equity and Inclusion, available to all employees.

On the International Human Rights Day, OTE Group launched an internal campaign focusing: on the Human Rights of all and the protection from any form of Violence and Harassment, based on the new Policy on "**Prevention and Combatting Violence and harassment in the workplace**". This and every relevant communication campaign, mentions the Code of Human Rights and Social Principles.

1,532 employees (as these are mentioned in the **Compliance Management** section) **participated in the Compliance trainings** ("Welcome on Board" program, "Customer Care induction" program and on-site awareness trainings for OTE Group

employees in GERMANOS owned shops - COSMOTE Shops) and were trained in aspects concerning Human Rights, considering that OTE Group Code of Human Rights and Social Principles along with Policies related to Human Rights are also included in all Compliance training material.

CTS and COSMOTE e-Value employees participated in the **e-learning training on Human Rights** issues, which has been rolled out anew in 2021. Of those assigned the training in late 2021:

- **CTS:** 1,814 employees completed training in 2022 (percentage: 54.82%). In 2021, 342 employees participated. Among the employees completed in 2022, 93 are in management positions (vs 33 employees in 2021).
- **COSMOTE E-Value:** 860 employees completed training in 2022 (percentage: 58.90%). Among them, 53 employees (30%) are in management positions.

OTE Group is committed to fulfilling its human rights responsibilities. To this end, in 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 2022, OTE Group participated in the second Diversity Month in May 2022, where employees were informed about the principles of Diversity, Equity and Inclusion through a communication campaign.

Visit for more information the corporate **website**.

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 ensure the timely payment of their suppliers, as defined in their procurement contracts. In 2022, payments made to our suppliers ranged from 0 (immediate) to 120 days, based on the type and value of the procurement.



Supply Chain

The development and maintenance of a value-adding supply chain for the Group, in alignment with economic, environmental and socially responsible standards and practices and the Group's vision, is a continuous target for improvement.

All lists of suppliers have been renewed.

Indicatively, in 2022, the lists consisted of¹:

- 1,076 suppliers for OTE
- 542 for COSMOTE
- 174 for GERMANOS
- 70 for COSMOTE E-Value
- 109 for CTS and
- 207 for Telekom Romania Mobile Communications.

The lists include both multinational and local companies for the purchase of materials and equipment and/or for the provision and lease of services. Moreover, all OTE Group suppliers supply goods, materials and/or services (i.e. "Tier 1" suppliers) directly to OTE Group since the latter has a contractual relationship with these suppliers and not with their subcontractors (if any). All existing OTE Group suppliers as well as potential future suppliers need to register in the OTE Group Supplier Portal and accept the provisions of the **OTE Group Supplier Code of Conduct**.

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**.

1. Suppliers that are common for more than one companies have been counted separately for each Company.

3. GOVERNANCE | 3.10 RESPONSIBLE PURCHASING AND SUPPLY CHAIN MANAGEMENT

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 suppliers 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 suppliers to comply with the **OTE Group Supplier Code of Conduct, OTE Group Code of Conduct** and **OTE Group Code of Human Rights and Social Principles**.

All the above are mandatory for business cooperation with the Group.

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 2022, the selection of suppliers for evaluation was based on all orders issued between 1/10/2020 - 30/9/2021, 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



1,480 **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 E-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 E-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 and services related to the Group Consolidated Management System.
- Certain suppliers who did not meet the above criteria but were proposed for evaluation.

Suppliers evaluated are asked to complete a self-assessment questionnaire regarding their performance on sustainability issues. This questionnaire aims to promote awareness on social and corporate responsibility. It includes questions related to corporate responsibility, sustainable development, employment, human rights, business continuity, health and safety, quality and the environment. Questions refer to the suppliers' performance, as well as to their suppliers' and sub-contractors' performance.

During 2022, supplier evaluation for the largest 3 OTE Group Companies is as follows:

- OTE evaluated 191 suppliers, representing 87.85% of the annual procurement value.
- COSMOTE evaluated 127 suppliers, amounting to 93.7% of the annual procurement value.
- Telekom Romania Mobile Communications evaluated 21 suppliers, amounting to 98.7% 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 or tellmecompliance@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. The group conducts monitoring of the suppliers and any subcontractors to effectively evaluate their 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 identified by OTE Group, a dedicated improvement plan is developed and implemented within a specific schedule.

Visit for more information the corporate [web page](#).

3.11 BUSINESS SECURITY AND DATA PRIVACY

MATERIAL ISSUE

WHY IT MATTERS

Protecting the personal data of customers, employees and other stakeholders of OTE Group, is a top priority. The Group recognizes that its overall success and sustainable development depend not only on networking of information flows and ensuring business security but also, above all, on the trustworthy and safe handling of personal data.



OTE Group is very conscious about identifying and managing the positive or negative, actual or potential impacts related to security and data privacy. This is achieved by establishing a variety of policies, initiatives and internal systems, as well as by ensuring compliance with relevant laws and regulations. These series of actions are continuously monitored, evaluated and updated to track the effectiveness and improve the overall performance of the Group in this area. By safeguarding customers' data, OTE Group can have a positive impact on the society and the economy by advocating and protecting human rights in relation to privacy and achieving customer and community satisfaction. On the other hand, data breach

incidents and weaknesses of the established systems are carefully addressed by the Group, since they can lead to dissatisfaction or even the involvement of law authorities, potentially affecting not only the brand's reputation but also its trustworthiness. OTE Group is committed to preventing and respectfully managing such cases to ensure the protection of data and personal information for all of its stakeholders and engages with them, where possible, for the resolution of incidents affecting them.

Data Security and Privacy

Data security and 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.

Data security and 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 data are further

processed for service improvement purposes, in order to draw useful statistical conclusions on the use of the services and the level of customer satisfaction. Data are processed for commercial purposes (customer profiling) subject to the 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

3. GOVERNANCE | 3.11 BUSINESS SECURITY AND DATA PRIVACY

oversight 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 of 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. A proactive approach to assessing and monitoring risk, detection, and timely and proper response to events, in alignment with security laws and regulations, is an integral part of the organization's security program. A culture of continuous improvement is in place, raising recommendations or further measures, where necessary, to ensure the organization's layered controls are operating effectively. Methodologies and standards, such as ISO/IEC 27001 and 27002, the 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 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 2022, the Privacy and Security Assessment (PSA) was re-executed for 48 critical systems and completed for 36 new systems/projects.

OTE's patching management procedure allows the identification, classification, and prioritization of potential vulnerabilities. To support that, in 2022 101 penetration tests were performed on various systems, and the development of a "Purple Security Team" that will simulate threats, tactics, and procedures was completed.

OTE Group Companies (OTE, COSMOTE, e-Value, CTS, and GERMANOS) apply an enterprise information security management system according to ISO/IEC 27001:2013 requirements and a privacy information management system based on ISO 27701, certified on an annual basis from an independent body. The ISO 27001 certification includes, amongst others, a set of different activities and tests (e.g. security risk assessments, vulnerability assessments, penetration tests, etc.) as they are part of the control statements being audited.

OTE's IT infrastructure and information security management systems are audited by external auditors on a yearly basis. For 2022, Deloitte performed the relative analysis and the results are expected soon.

Customers communicate their data subject requests to a dedicated channel established for each Company. In 2022, OTE and COSMOTE handled 1,798 data subject requests, while Telekom Romania Mobile handled 412 requests.

In 2022 OTE and COSMOTE investigated 11 customer requests, regarding the confidentiality of communications/security of customer data, and 34 requests from the Hellenic Authority for Communication Security and Privacy (ADAE). OTE and COSMOTE also handled 19 complaints that were submitted to the Hellenic Data Protection Authority (DPA).

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 (COSMOTE Payments, OTE Insurance, OTE Rural, GERMANOS Service).

3. GOVERNANCE | 3.11 BUSINESS SECURITY AND DATA PRIVACY



TIMELY RESPONSE TO SECURITY INCIDENTS IS PARAMOUNT FOR OTE GROUP

- Third-party data processing self-assessment. The assessment is performed through an online questionnaire that covers the requirements deriving from the data processing agreements signed with data processors. In 2022, 63 data processors completed the assessment.
- Group Data Protection Audit (GDPA) at OTE, COSMOTE, e-Value, CTS, GERMANOS, OTE Globe, and COSMOTE Payments. GDPA is performed through a questionnaire sent biannually to approximately 15% of employees and aims to monitor the data protection awareness level in the Company. The **Data Protection Award**

Index for the OTE group is 86/100.

- Data deletion audit in order to confirm the effectiveness of data deletion mechanism in specific systems.
- Review of General Data Privacy Notice for OTE and COSMOTE, and 19 other data privacy notices.
- User access rights review and certification.
- Verification that the access to communication data is justified. In 2022, approximately 200,000 justified access to communication data events were performed.

Moreover, other relevant data privacy projects/activities that took place include:

- Development of a new tool for Privacy & Security Risk Management.
- The second phase of the Schrems II project, which 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 was completed.
- Review of 511 Commissioned Data Processing Agreements (CDPAs).
- Provision of consultation on data protection issues for 270 internal and ICT projects/requests.

Aiming at continuous improvement on the level of security, OTE and COSMOTE carried out the following actions:

- Participated in national and international cyber-attack defense exercises.
- Ongoing project for the redesign and replacement of the entire infrastructure (core MS Windows Domains).
- Completion of deployment of a Privileged Account Management (PAM) tool covering the entire OTE-COSMOTE IT infrastructure.

- Completion of the redesign and the upgrade of the Identity Management System.
- Participated in the ongoing project for security performance management and third-party risk management.
- Conducted an annual Security Maturity Assessment for OTE and all subsidiaries.
- Finalized the revision of 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 2022, OTE and COSMOTE reported 23 incidents to the DPA and the ADAE, by adhering to GDPR and L.3471/2006 for the protection of personal data and privacy in the electronic telecommunications sector. 100% of those incidents involved personally identifiable information, with a total number of 25 customers affected. All of those incidents were classified as low-risk incidents.

During the year, a €9.25m fine was imposed by DPA and €3.2m fine from ADAE for a cyber incident that took place in September 2020. Moreover, €500k total fines were imposed by ADAE and €150k from DPA for

3. GOVERNANCE | 3.11 BUSINESS SECURITY AND DATA PRIVACY

SIM Swapping incidents that took place in 2020.

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 2022, OTE and COSMOTE processed requests for:

- Lawful interception on 7,947 telephone lines,
- Provisioning of:
 - External communication data on 18,451 telephone numbers,
 - Subscribers’ personal data from 10,548 telephone numbers,
 - Subscribers’ personal information from 5,886 IP addresses.

These requests are forwarded to ADAE, who in term includes them in its Annual Activity Report.

SIGNIFICANT DATA
2022



10,548

UNIQUE USERS
WHOSE INFORMATION WAS REQUESTED BY
GOVERNMENT OR LAW ENFORCEMENT AGENCIES

6,975

PERSONS
HAVE PARTICIPATED IN VARIOUS
AWARENESS SESSIONS

100%

**OF GOVERNMENT
AND LAW ENFORCEMENT REQUESTS**
WERE DISCLOSED TO THE REQUESTING PARTY

1,798

DATA SUBJECT REQUESTS
WERE HANDLED

86/100

THE DATA PROTECTION AWARD INDEX
OF GROUP DATA PROTECTION AUDIT

64

SUPPLIERS
PERFORMED A DATA PROTECTION
SELF-ASSESSMENT

3. GOVERNANCE | 3.11 BUSINESS SECURITY AND DATA PRIVACY

Physical Security

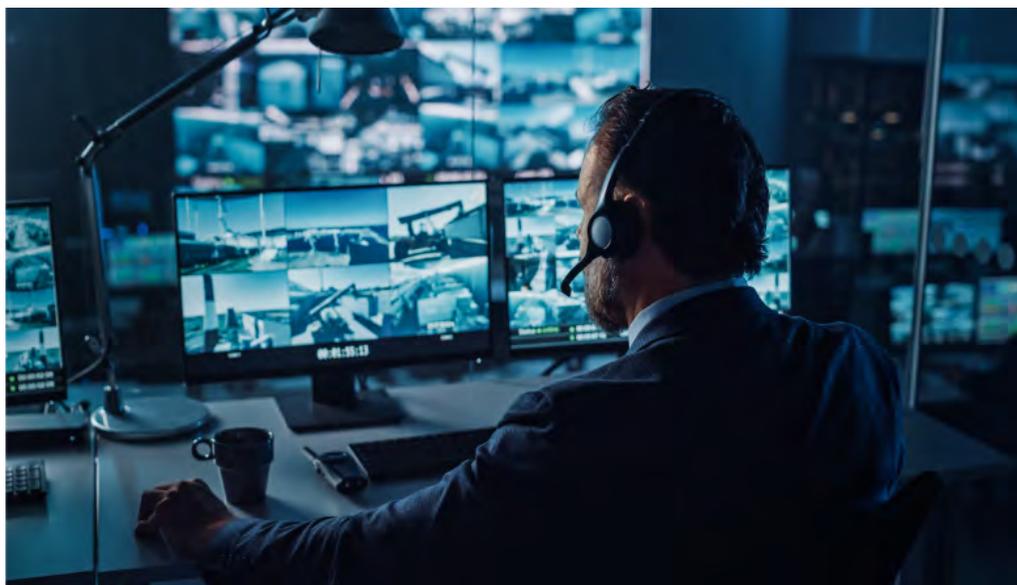
Physical security is the protection of personnel, hardware, software, networks, and data from physical actions and events that could cause serious loss or damage to an enterprise. In that respect, the following actions were implemented in 2022:

Security Hardening

- New Access Control System for KV/Cabinets: Approximately another 6,500 installations of the new access control system took place raising the total amount of sites monitored by the new system to around 32,000.
- Marousi HQ security redesign/hardening due to extensive building renovation – phase B.
- Expansion of centralized VMS/CCTV remote supervision and management at 15 critical buildings
- Security hardening (structural/electronic) at 13 buildings and 10 shops

Systems, Integration, and Process Improvement

- Expansion of the custom integrated database (iDB): Centralized access rights management and automated propagation to connected access control platforms significantly improving the day2day operations from a single point and audit capabilities.



Business Security and Data Privacy Awareness and Training

In 2022, 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.
- Basic guidelines regarding Physical Security, Information Security, and Data Privacy delivered to all newly insourced and outsourced employees.

by a quiz at the end of each season.

- Phishing e-mail awareness exercise: Test phishing email was sent to all employees for awareness-raising purposes.
- Data Privacy & Information Security awareness session addressed to special groups.
- Awareness Campaign for data encryption, data exports and acceptable rules rolled out to subsidiaries.

- E-learning for shop employees is completed, with 2,293 participations.
- E-learning for customer service (e-Value) is completed, with 3,051 participations.
- E-learning for field technicians was launched to 1,483 employees.
- E-learning for newcomers in Customer Service, Shops and field technicians attended by 3,205 new employees.
- Security Awareness Series: A 4-season series covering Social Engineering, Cyberattacks and Ransomware was available to all employees, accompanied



3. GOVERNANCE | 3.11 BUSINESS SECURITY AND DATA PRIVACY

GREECE
SIGNIFICANT DATA 2022



103

PHYSICAL SECURITY INCIDENTS

WERE RECORDED AND MANAGED, 58 OF WHICH REFERRED TO BASE STATIONS, 30 TO KVS, 12 TO BUILDINGS, 2 TO SHOPS, AND 1 OTHER (FIRE IN A CORPORATE SERVICE VEHICLE).



3,211

ACCESS CONTROL CARDS WERE ISSUED



4,216

ENTRANCE PERMITS TO OTE GROUP PREMISES WERE ISSUED



4,906

REQUESTS FOR ACCESS RIGHTS WERE PROCESSED



1,950

ELECTRONIC KEYS AND 10,630 ACCESS RIGHTS FOR THE NEW ACCESS CONTROL SYSTEM AT KV/CABS WERE PROCESSED



370

ACCESS RIGHTS BY MOBILE (MYNETGO APP) WERE PROCESSED



1,037,597

ALARMS IN OUTDOOR CONNECTION CABINETS AND CABINS AND 15 EVENTS-PERSONAL PROTECTION WERE MANAGED.



150

CHECKS OF GUARDING STATIONS AND BUILDINGS, 145 PREVENTIVE CHECKS FOR THE DETECTION OF EXPLOSIVES WERE CONDUCTED.



45

INSPECTIONS IN GROUP STORES NATIONWIDE, 330 CHECKS OF PREMISES AND 30 CHECKS OF VEHICLES FOR PRIVACY ASSURANCE, 60 RETRIEVALS OF STORES' CLOSED-CIRCUIT TV OF VIDEO SURVEILLANCE RECORDINGS (CCTV), 10 STUDIES OF PHYSICAL SAFETY IN STORES AND EMERGENCY SECURITY GUARDS IN 63 STORES WERE PERFORMED.



35

BUILDING RETRIEVALS OF CLOSED-CIRCUIT TV OF VIDEO SURVEILLANCE RECORDINGS (CCTV) WERE PERFORMED.



50

CABINS DIRECT INTERVENTIONS WERE MANAGED

ROMANIA
SIGNIFICANT DATA 2022



4

PHYSICAL SECURITY INCIDENTS

WERE RECORDED AND MANAGED,



122

ACCESS CONTROL CARDS AND 122 CORPORATE BADGES WERE ISSUED



101

PHYSICAL SECURITY RISK ASSESSMENTS WERE CARRIED OUT



2

ON-SITE PHYSICAL SECURITY INSPECTION VISITS WERE PERFORMED



412

DATA SUBJECT REQUESTS WERE HANDLED

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 continuity of critical Products and Services.

To ensure the continuous and stable provision of products and services, OTE Group systematically identifies, evaluates, and assesses the impacts related to its business continuity. By providing sound risk management practices and effective business continuity planning to minimize the impacts of uncertainties and disruptions, the Group can achieve stakeholders' satisfaction, while enhancing the overall confidence of the public regarding telecommunications. At the

same time, incidents that threaten the continuity of operations or pose a risk to the business could provoke a disruption to society and economy due to downtime in ICT services, affecting companies and individuals. Moreover, the inadequate management of crises related to the business, the Group's operations and assets could potentially damage people or communities, affecting the society, the economy and even the environment.

The Business Continuity Management System (BCMS) provides a consistent and structured systematic method for identifying threats to protect against, reduce the likelihood of, timely respond to, and recover from adverse events and disruptions. Through the implementation of this Management System, OTE Group is committed to enhance the organization's resilience and minimize the potential impact of threats on business operations.



OTE Group continues to successfully adjust its operational models by incorporating the principles of Business Continuity Management into its business culture. Flexible business models and ways of working have been seamlessly integrated into daily operations, using disruption as an advantage for growth and innovation.

As part of this method, the OTE Group Business Continuity team implements and maintains a systematic process to assess the risk of disruption and analyze the business impacts, using a newly developed digital tool. Based on the Business Impact Analysis, it designs specific strategies and Business Continuity Plans (BCPs) to be implemented when dealing with disruptive incidents. Besides maintaining critical operations during a crisis and resuming to normal business quickly, BCPs allow the organisation to adapt effectively to the changing environmental, economic, and social conditions. The BCPs are regularly monitored and improved based on lessons learned and arising needs.

A dedicated operational structure is in place to prioritize the necessary actions and define who should be involved in incident management. The OTE Group Business Continuity team participates in several interdepartmental and international working

3. GOVERNANCE | 3.12 BUSINESS CONTINUITY

groups, engaging in projects related to both the aftermath of the COVID-19 pandemic and the ongoing climate change and energy crisis, driving resilience enhancement across the Organization. The team retains close cooperation with public and local authorities involved in incident management.

Performance Monitoring Indicators Metrics (KPIs) are established to track the effectiveness and to evaluate the progress of specific areas covered by Business Continuity Plans and Risk Assessments (critical services and buildings). The performance of the BCMS is measured and monitored, using the in-house developed BCMS Maturity report. In addition, the effectiveness of the Network Recovery Program is evaluated on an annual basis, taking into account updates on the system's documentation, specific KPIs related, as well as results from the readiness exercises.

A downtime in telecommunication services may disrupt the continuous provision of products and services, adversely affecting both stakeholders' satisfaction and Customers' confidence. For 2022, the system average interruption frequency was approximately 0.08 times per month and the customer average interruption duration was estimated to about 5.56 minutes.

The Business Continuity Management System of the major OTE Group Companies¹ are fully certified according to ISO 22301:2019 requirements. The certification process for the companies GERMANOS and e-Value completed in 2022.

Major achievements in 2022 include:

- HR Awards 2022: OTE Group's response to the COVID-19 pandemic received the bronze award in the "Best Crisis Management Strategy" category.

- Update of all the Business Continuity Plans to cover the critical processes of all key COSMOTE products and services.
- Implementation of risk assessment studies in critical services – either for COSMOTE or its ICT customers – and critical buildings all over Greece.
- Digital validation, testing, and exercise of all Business Continuity Plans.
- Contribution to the survey of the Ministry for Climate Crisis and Civil Protection

"Questionnaire to record roles and responsibilities of entities involved in risk management and disaster response", as part of the collaboration between the OTE Group Business Security & Continuity team and the Local Authorities.

- Provision of Guidelines for extreme weather phenomena to define and prioritize the necessary actions in order to minimize the impact on the Group's infrastructure and services.
- Enhancements on winter power outages and fire protection measures for critical Telecommunication Data Centers. Automated controls have already been put in place.
- Optimize the BCM arrangements and alternative workplaces operational readiness with monthly tests.
- Validation of the essential contact details data and test the preparedness of the BCM operational team's response time due to alternative communication channels tests.
- Exercising the Situation Center's tools (the channels of bulk sms).
- Technology Networks (Fixed and Mobile) strengthening, by utilizing resilient and more efficient technologies.
- Update of Disaster Recovery Plans by IT and



1 OTE, COSMOTE, CTS, GERMANOS, COSMOTE e-Value

3. GOVERNANCE | 3.12 BUSINESS CONTINUITY

Network to reflect existing and new technologies.

- Continuous development of an automated and structural methodology for Network Impact Analysis, taking into consideration Sustainability and environmental constraints.
- TCFD study was undertaken at Group level to yield future enhancements of Critical Infrastructure as a result of climate change.

COSMOTE has designed and implemented its network exercising geo-redundancy across its operational region for its critical network infrastructures, utilizing cloud-based technologies and high availability nodes.

Critical telecommunication and electronic services run uninterruptedly during disaster events. Several resilient infrastructures are 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 and Installation).

Extra Battery Backup for Access Network

- All DSLAM Cabinets were enhanced with battery backup.
- Extensive Power Plan with Base Station Battery Autonomy based on predefined criteria.

Power in Critical Buildings

- Extensive Power Plan for 108 Critical Telecom Buildings.
 - Due to the fuel and energy crisis, extra precautions were taken for refueling Critical Building Power Infrastructures by reserving extra fuel tanks. Fuel transportation redundancy is also implemented to guarantee deliveries.
 - 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).



OTE GROUP SITUATION CENTER



IN 2022, THROUGH THE GROUP'S BUSINESS CONTINUITY INCIDENTS REPORTING PROCESS:

24 EVENTS OF BUSINESS CONTINUITY WERE EVALUATED.

6 POTENTIAL AND MINOR EVENTS, WHICH COULD HAVE IMPACTED THE GROUP'S BUSINESS CONTINUITY, WERE INVESTIGATED.

2 OUTBOUND NOTIFICATIONS WERE SENT TO DEUTSCHE TELEKOM'S SITUATION CENTER.

97 SMS NOTIFICATIONS WERE SENT INTERNALLY TO TARGETED GROUPS PROVIDING INFORMATION ABOUT BUSINESS CONTINUITY INCIDENTS.

3. GOVERNANCE | 3.12 BUSINESS CONTINUITY

Awareness and Training

In 2022, several awareness and training programs were carried out that, among others, included:

- Briefing about Business Continuity during the introductory training of all newly recruited employees.
- OTE Group, adjusting to the new conditions enforced by the COVID-19 pandemic, adopted a new, hybrid working model that relies on both the physical presence of the employees in the office, but also takes advantage of the flexibility offered by technology. In this year's Global Business Continuity Week, organized by the Business Continuity Institute (BCI) the theme was

"Building Resilience in the Hybrid World", aiming to promote healthy communication and collaboration between employees, working teams and departments, even remotely, to ensure the resilience of the organization and society in general. The awareness campaign included BCM e-learning and was communicated to employees via newsletter and with a dedicated article in the organization's intranet.

- Relevant articles and useful guidelines were posted in OTE Group's newsletters and intranet (myNet) to strengthen the Business Continuity Awareness mindset.



3.13 INTEGRATED MANAGEMENT SYSTEM

THE INTEGRATED MANAGEMENT SYSTEM (IMS) IMPLEMENTED AT OTE GROUP IN GREECE IS BASED ON A CORPORATE PROCESS MODEL.

The Top Management’s commitment is reflected in OTE Group’s Policy on the Integrated Management System.

Certifications

The certified management systems at OTE Group, supported by representatives from various business units throughout OTE Group subsidiaries, are presented below.

- Integrated Management System, as per PAS99.
- Quality Management System, as per ISO 9001.
- Environmental Management System, as per ISO 14001.
- Occupational Health & Safety Management System, as per ISO 45001.
- Information Security Management System, as per ISO 27001.
- Privacy Information Management System, as per ISO 27701.
- Business Continuity Management System, as per ISO 22301.
- Information Technology - Service Management, as per ISO 20000-1.
- Energy Management System, as per ISO 50001.

- Risk Management System according to ISO 31000.
- Anti-Bribery Management System, as per ISO 37001.
- Compliance Management System, as per ISO 37301.
- Whistleblowing Management System, as per ISO 37002.
- Road Traffic Safety Management System, as per ISO 39001.
- Educational Organizations Management System, as per ISO 21001.
- General Requirements for the Competence of Testing and Calibration Laboratories, as per ISO 17025.
- System of Principles and Good Practice Guidelines for the Distribution of Medical Devices.
- National Industrial Security Certification (EKBA).
- OTE Group Certifications, also incorporate ISAE 3402 Type 2 Report ("Assurance reports on controls at a service

organization") and ISAE 3000 Type 2 Report ("Assurance Engagements other than Audits or Reviews of Historical Financial Information"), which are being issued by international auditing company in accordance with the International Standard on Assurance Engagements of the International Auditing and Assurance Standards Board. These reports are related to the design and operational effectiveness of controls and the respective control environment of ICT services delivered to customers.

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](#).

Visit for more information the corporate [web page](#).



APPENDIX

2022 Performance	209
Accountability Principles Standards - AA1000 Index	211
United Nations Global Compact - Communication of Progress (CoP)	212
ATHEX Guide Index	214
SASB Index	216
Greek Sustainability Code – Declaration of Conformity	218
Global Reporting Initiative Content Index	220
Additional information for GRI Indicators	230
Human Resources Performance Data	241
Environmental Performance Data	249
Task Force on Climate Related Financial Disclosures (TCFD) Index	255
Independent Assurance Report	257

2022 PERFORMANCE

2022 GOALS		2022 PERFORMANCE	
Responsible Business			
OTE Group: Development of KRIs (Key Risk Indicators) in order to define tolerance levels by 2024.	IP	See Compliance Management	
OTE Group: Increase awareness of employees via e-learning on Risk Culture/Risk Management by 2023.	IP	See Compliance Management	
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.	IP	See Compliance Management	
OTE Group: OTE (and / or an affiliated company) to apply for the "World's Most Ethical Companies" award within 2022.	F	See Compliance Management	
OTE Group: Increase awareness of employees and business partners on compliance issues (e-learnings 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.	IP	See Compliance Management The Code of Conduct e-learning was implemented during 2022.	
OTE Group: Conduct human rights risk and impact analysis at OTE/COSMOTE affiliated companies within 2022.	F	See Compliance Management and Human Resources Management	
OTE Group: Completion of Phase 2 of the Schrems II project within 2022	F	See Business Security and Data Privacy	
OTE Group: Completion of external audit for ISO 27701 within 2022.	F	See Business Security and Data Privacy In 2022, Group Companies successfully had their Information Security Management Systems recertified according to ISO 27001:2013 requirements	
OTE Group: Completion of data deletion implementation review within 2022.	F	See Business Security and Data Privacy	
Employees			
OTE Group - Greece: Focus on skill transformation and developing a digital learning culture - Digital Learning Quota YE 2022: 70%	F	See Employee Training and Skills Development	
OTE-COSMOTE-CTS-GERMANOS: Focus on skill transformation and developing a digital learning culture - Introduce Future Skill Management within 2022.	P	See Employee Training and Skills Development . Design of the tool was completed. Launch will be decided at a later stage due to other prioritization.	
OTE Group: Bring the Group-wide health rate ¹ up to 98% by 2022.	F	See Health and Safety and Appendix . The average health rate for 2022 was 98%.	
OTE, COSMOTE, CTS, GERMANOS: Reduce the total number of work-related accidents (vs 2021).	N	The increase in the number of accidents is related to the reduction of teleworking in 2022 compared to 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-learnings for all employees).	F	See Human Resources Management , Employee Selecting, Attracting and Retaining and Employee Training and Skills Development The design of the Mentoring Program for women has been completed and expected to be implemented in 2023.	
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).	F	See Human Resources Management , Employee Training and Skills Development and Employee Communication, Engagement and Satisfaction	

APPENDIX | 2022 PERFORMANCE

2022 GOALS		2022 PERFORMANCE
Customers		
OTE-COSMOTE: Offer the capability to sell our services remotely through our digital channels, without physical human interaction by 2023.	IP	In 2022 there was an increasing trend in sales through digital channels. e-sales ratio yearly average reached 10.9% in 2022 vs 7.1% 2021. Moreover, digital on boarding functionalities were expanded to additional sales use cases, through physical remote channels and also shops, contributing to the elimination of paper usage and maximization of digital customer experience. A new capability to use Digital ID at point of sales has been developed in cooperation with Public authorities and launched in 2022.
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.	IP	As a company, we have invested heavily in providing exceptional customer service through our IVR and chatbot systems. In 2022, more self-care capabilities were developed to cover customer inquiries. Over 100 self-service options are in place to ensure our customers are fully informed and satisfied. In 2022, our IVR deflection rate was 34%, while our chatbot deflection rate was 60%. For 2023, we have set an ambitious target of 13% of chat share in our inbound contacts. Our Net Promoter Score (NPS) currently sits at an impressive 50, which is a testament to the quality of service we provide.
Society		
OTE Group-Greece: Impact approximately 15m peoples' lives through digital inclusion initiatives by 2024 (from 2021).	IP	See Overall Social Contribution Between 2021 and 2022, a total of 10.2m people were benefited from digital inclusion initiatives.
OTE-COSMOTE: Enhance training programs for improvement of STEM skills for children within 2022.	F	Within 2022, we provided Elementary & Junior High Schools students and children aged 6-12 with three different Stem training programs for educational robotics, programming, and coding giving more children the opportunity to enhance their Stem Skills.
Environment		
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.	F	The RES target is fully achieved
• 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).	IP	See Energy and Climate Change
• 25% reduction of value chain (scope 3) emissions per customer by 2030, compared with 2017 (base year).	IP	See Energy and Climate Change
• Net zero GHG emissions (scope 1, 2 and 3) at the latest by 2040.	IP	See Energy and Climate Change
OTE Group: Zero ICT waste ² to landfill (2022 onwards).	F	See Circular Economy
OTE Group Greece: Reach 400,000 mobile devices ³ from take-back schemes by 2024.	IP	See Circular Economy
OTE Group: 100% sustainable packaging ⁴ for own branded newly launched (by the 2nd semester 2022) and devices.	F	See Circular Economy
OTE Group Greece: Retain the elimination of single use plastic items ⁵ in major buildings in 2022.	F	See Circular Economy
OTE Group Greece: 25% reduction of paper use in 2023 vs to 2020.	IP	See Circular Economy
COSMOTE: Installation of 2 additional EMF measurement stations.	F	See Electromagnetic Fields

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).

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

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

4 Non-applicable target for Telekom Romania Mobile Communications.

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

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 / Risks and Uncertainties for the Next Year / Stakeholder Management & Engagement / Corporate Governance Structure and Members / Sustainability Governance / 2022 Performance / Additional Information for GRI Indicators
Materiality	Identification of issues which are important to the company and its stakeholders	Sustainable Business Model / Risks and Uncertainties for the Next Year / Stakeholder Management & Engagement / Corporate Governance Structure and Members / Sustainability Governance / 2022 Performance / Additional Information for GRI Indicators
Responsiveness	Responsiveness to key issues and transparency on performance	Report Profile / Sustainable Business Model / Stakeholder Management & Engagement / Sustainability Governance / Appendix
Impact	Analysis of direct and indirect impact of the company's actions.	Report Profile / Sustainable Business Model / Key Achievements and Targets / Stakeholder Management & Engagement / Environment / Fair Employment and Equal Opportunities / Health and Safety / Employee Selecting, Attracting and Retaining / Safe and Responsible Use of Technology / Communication with Customers / Social Initiatives / Sustainability Governance / Enterprise Risk Management / Compliance Management / Business Security and Data Privacy / Business Continuity / Appendix

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 2022 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
Implementation of the Ten Principles into Strategies & Operations	
1 The CoP describes mainstreaming into corporate functions and business units	Sustainable Business Model / Sustainability Governance
2 The CoP describes value chain implementation	Responsible Purchasing and Supply Chain Management
Robust Human Rights Management Policies & Procedures	
3 The CoP describes robust commitments, strategies or policies in the area of human rights	Human Rights Management
4 The CoP describes effective management systems to integrate the human rights principles	Human Rights Management
5 The CoP describes effective monitoring and evaluation mechanisms of human rights integration	Human Rights Management
Robust Labour Management Policies & Procedures	
6 The CoP describes robust commitments, strategies or policies in the area of labour	Employees
7 The CoP describes effective management systems to integrate the labour principles	Employees
8 The CoP describes effective monitoring and evaluation mechanisms of labour principles integration	Employees
Robust Environmental Management Policies & Procedures	
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



APPENDIX | UNITED NATIONS GLOBAL COMPACT – COMMUNICATION ON PROGRESS (COP)

CRITERIA	REPORT LOCATION
Anti-Corruption Management Policies & Procedures	
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
Taking Action in Support of Broader UN Goals and Issues	
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	Connectivity for All, Compliance Management
18 The CoP describes partnerships and collective action	Awards / Additional Information for GRI Indicators
Corporate Sustainability Governance and Leadership	
19 The CoP describes CEO commitment and leadership	About this Report - Message from the Chairman and CEO / Corporate Governance Structure and Members / 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	Energy and Climate Change / Environmental Performance Data - Energy GHG intensity of scope 1 emissions: 4.40 t CO ₂ eq per million €
	C-E2	Scope 2 emissions	Energy and Climate Change / Environmental Performance Data - Energy GHG intensity of scope 2 emissions: 0.02 t CO ₂ eq per million € (market-based)
	C-E3	Energy consumption and production	Energy and Climate Change / Environmental Performance Data - Energy Total amount of energy produced: 1,526 MWh Total percentage of energy produced from RES: 100%
Advanced Metrics	A-E1	Scope 3 emissions	Energy and Climate Change GHG intensity of scope 3 emissions: 122 t CO ₂ eq per million €
	A-E2	Climate change risks and opportunities	Risks and Uncertainties for the Next Year / Energy and Climate Change / Annual Financial Report 2022 (D. RISKS AND UNCERTAINTIES FOR THE NEXT YEAR, p. 16-26) Detailed information concerning climate change risks and opportunities identified, can be found in the latest response of OTE to CDP.
	A-E3	Waste management	Circular Economy - Reuse and Recycle / OTE Group Environmental Performance Data - Waste
	A-E4	Effluent discharge	Circular Economy - Water
	A-E5	Biodiversity sensitive areas	Other Environmental Aspects (Biodiversity) / Global Reporting Initiative Content Index (GRI 304-1, 304-2, 304-3, 304-4)
Sector-specific	SS-E7	Critical materials	Global Reporting Initiative Content Index (GRI 301-1, 301-2)
Social			
Core Metrics	C-S1	Stakeholder engagement	Stakeholder Management & Engagement / OTE Group Internal Regulation of Operations / Article 36: Communication Channels
	C-S2	Female employees	Employment / Human Resources Performance Data
	C-S3	Female employees in management positions	Fair Employment and Equal Opportunities / Human Resources Performance Data
	C-S4	Employee turnover	Employment / Human Resources Performance Data
	C-S5	Employee training	Employee Training and Skills Development / Human Resources Performance Data
	C-S6	Human rights policy	Human Rights Management
	C-S7	Collective bargaining agreements	Fair Employment and Equal Opportunities / Human Resources Performance Data
	C-S8	Supplier assessment	Responsible Purchasing and Supply Chain Management



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 and Equal Opportunities
	A-S4	CEO pay ratio	Annual Financial Report 2022 (1.9. Compensation of executive Members of the Board of Directors for year 2022, p. 57) / Remuneration Report for the Members of the Board of Directors for the fiscal year 2021
Sector-specific Metrics	SS-S3	Legal requests of user data	Business Security and Data Privacy
	SS-S5	Data security and privacy fines	Business Security and Data Privacy
Governance			
Core Metrics	C-G1	Board composition	Corporate Governance Structure and Members / Board Of Directors / Human Resources Performance Data / Annual Financial Report 2022
	C-G2	Sustainability oversight	Sustainability Governance / Annual Financial Report 2022
	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	Business 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 2022 (1.9. Compensation of executive Members of the Board of Directors for year 2022, p. 57) / Remuneration Report for the Members of the Board of Directors for the fiscal year 2021
	A-G5	External assurance	Independent Assurance Report
Sector-specific Metrics	SS-G3	Systemic risk management	Risks & Uncertainties for the Next Year / Enterprise Risk Management / Business Continuity

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 Energy and Climate Change See Environmental Performance Data – Energy	Gigajoules (GJ), Percentage (%)	TC-TL-130a.1
Data Privacy	Description of policies and practices relating to behavioral advertising and customer privacy	Discussion & Analysis	See Business Security and Data Privacy See Communication with Customers	n/a	TC-TL-220a.1
	Number of customers whose information is used for secondary purposes	Quantitative	See Business Security and Data Privacy 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 Business Security and Data Privacy	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 Business Security and Data Privacy	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 Business Security and Data Privacy	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 Business Security and Data Privacy	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 Circular Economy - Reuse and Recycle See OTE Group Environmental Performance Data - Waste	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	See Responsible Competition No fine imposed during 2022, as a result of anticompetitive behavior	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 of 2022: 82.94Mbps Semester 2 of 2022: 76.73Mbps 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
	Description of risks and opportunities associated with net neutrality, paid peering, zero rating and related practices	Discussion & Analysis	See Risks and Uncertainties for the Next Year / Compliance Management / Code of Conduct for E-Commerce / Connectivity for All / Products and Services for Sustainability / Digital inclusion for All / Compliance Management / Code of Conduct for E-Commerce	n/a	TC-TL-520a.3



APPENDIX | SASB INDEX

TOPIC	TELECOMMUNICATION SERVICES SASB METRIC	CATEGORY	DISCLOSURE	UNIT OF MEASURE	CODE
Managing Systemic Risks from Technology Disruptions	(1) System average interruption frequency and (2) customer average interruption duration	Quantitative	See Business Continuity	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 Business Continuity	n/a	TC-TL-550a.2

ACTIVITY METRICS	CATEGORY	DISCLOSURE	UNIT OF MEASURE	CODE
Number of wireless subscribers	Quantitative	See Annual Financial Report 2022 (p.9, 11)	Number	TC-TL-000.A
Number of wireline subscribers	Quantitative	See Annual Financial Report 2022 (p.9, 11)	Number	TC-TL-000.B
Number of broadband subscribers	Quantitative	See Annual Financial Report 2022 (p.9, 11)	Number	TC-TL-000.C
Network traffic	Quantitative	OTE Group 8,858 PB OTE Group in Greece 8,572 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 2022 Integrated Report

CRITERIA	REPORT LOCATION
Strategy	
1. Strategic analysis and action	Sustainable Business Model
2. Materiality	Stakeholder Management & Engagement
3. Objectives	Key Achievements and Targets / 2022 Performance
4. Value chain management	Responsible Purchasing and Supply Chain Management
Process Management	
5. Responsibility	Corporate Governance Structure and Members
6. Rules and procedures	Enterprise Risk Management / Compliance Management / Integrated Management System
7. Monitoring	Sustainable Business Model / Key Achievements and Targets / Corporate Governance Structure and Members Integrated Management System / Independent Assurance Report
8. Rewarding schemes and motives for sustainable development	Corporate Governance Structure and Members / Board of Directors / Employee Selecting, Attracting and Retaining
9. Stakeholders engagement	Stakeholder Management & Engagement / Additional Information for GRI Indicators / Materiality Analysis and Stakeholders
10. Responsible products and innovation	Energy and Climate Change / Products and Service for Sustainability
Environment	
11. Use of natural resources	Energy and Climate Change / Circular Economy
12. Management of resources	Energy and Climate Change / Circular Economy / Environmental Performance Data - Waste
13. Climate relevant emissions	Energy and Climate Change / Other Environmental Aspects / Environmental Performance Data - Energy



APPENDIX | GREEK SUSTAINABILITY CODE – DECLARATION OF CONFORMITY

CRITERIA	REPORT LOCATION
Society	
14. Employment rights	Human Rights Management / Fair Employment and Equal Opportunities / Human Resources Performance Data / OTE Group Code of Human Rights and Social Principles / OTE Group Policy on Employee Relations
15. Equal opportunities	Human Rights Management / Fair Employment and Equal Opportunities / Health and Safety OTE Group Code of Human Rights and Social Principles
16. Qualifications	Human Resources Management / Employment / Employee Selecting, Attracting and Retaining / Employee Training and Skills Development / Human Resources Performance Data
17. Human rights in the supply chain	Human Rights Management / Responsible Purchasing and Supply Chain Management / OTE Group Code of Human Rights and Social Principles
18. Corporate citizenship	Group Presentation / Key Achievements and Targets / Connectivity for All / Overall Social Contribution
19. Initiatives and political influence	Awards / Stakeholder Management & Engagement / Compliance Management
20. Corruption prevention and fighting	Compliance Management

GLOBAL REPORTING INITIATIVE CONTENT INDEX

The OTE Group has reported in accordance with the GRI Standards for the period from 1 January 2022 to 31 December 2022.

GRI 1 used: GRI 1: Foundation 2021 | **Applicable GRI Sector Standard(s):** No finalized GRI Sector Standard is applicable to OTE Group.

GRI STANDARDS	DISCLOSURE	SECTION
General Disclosures		
GRI 2 General Disclosures 2021	The organization and its reporting practices	
	2-1 Organizational details	Report Profile / Group Presentation
	2-2 Entities included in the organization's sustainability reporting	Report Profile / Group Presentation
	2-3 Reporting period, frequency and contact point	Report Profile / Annual Report / June 2023
	2-4 Restatements of information	Report Profile
	2-5 External assurance	Report Profile / Independent Assurance Report
	Activities and workers	
	2-6 Activities, value chain and other business relationships	Group Presentation / Key Achievements and Targets / Risks & Uncertainties for the Next Year / Financial and Operational Highlights / Connectivity for All / Responsible Purchasing and Supply Chain Management
	2-7 Employees	Sustainable Business Model / Key Achievements and Targets / Financial and Operational Highlights / Employment / Human Resources Performance Data
	2-8 Workers who are not employees	Employment / Human Resources Performance Data External workforce who are not employees but whose workplace controlled by the OTE Group: 5,004 external workforce of Group companies. This external workforce are not employees of OTE Group, but of a) 2 specific companies collaborating with the Group in Greece and b) relevant companies collaborating with the Group in Romania. This external workforce undertakes several duties for the Group companies (eg call centers, office services).
	Governance	
	2-9 Governance structure and composition	Corporate Governance Structure and Members / Board of Directors / Annual Financial Report 2022 (D. Board of Directors and Committees that consist of members of the Board of Directors – Remuneration of the Board Members/ Remuneration of executive Board Members – Other administrative, managerial or supervising corporate bodies or committees, p.47)
	2-10 Nomination and selection of the highest governance body	Remuneration and Nomination Committee / Suitability Policy / Board of Directors / Annual Financial Report 2022
2-11 Chair of the highest governance body	Corporate Governance Structure and Members	
2-12 Role of the highest governance body in overseeing the management of impacts	Corporate Governance Structure and Members / Board of Directors / Sustainability Governance	
2-13 Delegation of responsibility for managing impacts	Corporate Governance Structure and Members / Board of Directors / Sustainability Governance / Annual Financial Report 2022 (D. Board of Directors and Committees that consist of members of the Board of Directors – Remuneration of the Board Members/ Remuneration of executive Board Members – Other administrative, managerial or supervising corporate bodies or committees, p. 47)	
2-14 Role of the highest governance body in sustainability reporting	Report Profile / Sustainability Governance	
2-15 Conflicts of interest	Annual Financial Report 2022 (1.10 (I) Management of conflicts of interest situations, p. 62)	



GRI STANDARDS	DISCLOSURE	SECTION
General Disclosures		
	2-16 Communication of critical concerns	Corporate Governance Structure and Members / Board of Directors / Annual Financial Report 2022 (2. Board of Directors' Committees – Composition – Responsibilities – Remuneration – Evaluation of effectiveness, p. 64)
	2-17 Collective knowledge of the highest governance body	Sustainability Governance / Annual Financial Report 2022 (1. Board of Directors (Suitability Policy of the members - Role - Composition - Operation), p. 47)
	2-18 Evaluation of the performance of the highest governance body	Corporate Governance Structure and Members / Board of Directors / Annual Financial Report 2022 (2. Board of Directors' Committees – Composition – Responsibilities – Remuneration – Evaluation of effectiveness, p. 64) / Remuneration Policy / Remuneration Report for the Members of the Board of Directors for the fiscal year 2021 / Remuneration and Nomination Committee
	2-19 Remuneration policies	Remuneration and Nomination Committee / Remuneration Policy / Board of Directors
	2-20 Process to determine remuneration	Remuneration and Nomination Committee / Remuneration Policy
	2-21 Annual total compensation ratio	Annual Financial Report 2022 (1.9. Compensation of executive Members of the Board of Directors for year 2022, p. 57) / Remuneration Report for the Members of the Board of Directors for the fiscal year 2021 Median annual total compensation not publicly available.
	Strategy, policies and practices	
	2-22 Statement on sustainable development strategy	Message from the Chairman and CEO
	2-23 Policy commitments	Key Achievements and Targets / Fair Employment and Equal Opportunities / Employee Selecting, Attracting and Retaining / Health and Safety / Sustainability Governance / Compliance Management / Business Security and Data Privacy / Responsible Purchasing and Supply Chain Management / Integrated Management System / Annual Financial Report 2022 (C. Internal Control System, p. 41)
	2-24 Embedding policy commitments	Enterprise Risk Management / Compliance Management / Integrated Management System / Annual Financial Report 2022 (C. Internal Control System, p. 41)
	2-25 Processes to remediate negative impacts	Compliance Management / Business Security and Data Privacy / Business Continuity
	2-26 Mechanisms for seeking advice and raising concerns	Compliance Management
	2-27 Compliance with laws and regulations	Communication with Customers - Safe, Branded Customer Products / Compliance Management / Business Security and Data Privacy The fines (related to the environment) imposed in 2022 amounted to €27,396, 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.
	2-28 Membership associations	Stakeholder Management & Engagement / Awards / Compliance Management / Additional Information for GRI Indicators - Memberships



APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS	DISCLOSURE	SECTION
	Stakeholder engagement	
	2-29 Approach to stakeholder engagement	Report Profile / Sustainable Business Model / Stakeholder Management & Engagement / Employee Communication, Engagement and Satisfaction / Customer Service and Satisfaction / Additional Information for GRI Indicators – Primary Stakeholders
	2-30 Collective bargaining agreements	Fair Employment and Equal Opportunities / Human Resources Performance Data
		Approx. 97% of the employees are covered by collective agreements. The Company respects the minimum requirements set by relevant law. For employees that are not in scope of the collective agreements (Chief Officers, Directors, Senior Managers & in-house lawyers), their working conditions are determined by a) their individual employment agreement and b) Company decisions and policies.
Material topics		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Stakeholder Management & Engagement
	3-2 List of material topics	Stakeholder Management & Engagement
Material Issue: Ethical Business Practices		
GRI 3: Material Topics 2021	3-3 Management of material topics	Key Achievements and Targets / Stakeholder Management & Engagement - Materiality Analysis / Compliance Management / Additional Information for GRI Indicators - Materiality Analysis
GRI 205 Anti-corruption 2016	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
GRI 206 Anti-competitive behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Compliance Management



APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS	DISCLOSURE	SECTION
Material issue: Energy, Emissions and Climate Change		
GRI 3: Material Topics 2021	3-3 Management of material topics	Energy and Climate Change / Environmental Strategy / Key Achievements and Targets / Stakeholder Management & Engagement - Materiality Analysis / Additional Information for GRI Indicators
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Energy and Climate Change / Environmental Performance Data - Energy
	302-3 Energy intensity	Energy and Climate Change / Environmental Performance Data - Energy
	302-4 Reduction of energy consumption	Energy and Climate Change / Environmental Performance Data - Energy
	302-5 Reductions in energy requirements of products and services	Energy and Climate Change / Environmental Performance Data - Energy
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Energy and Climate Change / Other Environmental Aspects / Environmental Performance Data - Energy
	305-2 Energy indirect (Scope 2) GHG emissions	Energy and Climate Change / Environmental Performance Data - Energy
	305-3 Other indirect (Scope 3) GHG emissions	Energy and Climate Change
	305-4 GHG emissions intensity	Energy and Climate Change
	305-5 Reduction of GHG emissions	Energy and Climate Change / Environmental Performance Data - Energy
	305-6 Emissions of ozone-depleting substances (ODS)	Other Environmental Aspects
	305-7 Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Additional Information for GRI Indicators / Direct Non-GHG Emissions
Material Issue: Fair Employment and Employee Management		
GRI 3: Material Topics 2021	3-3 Management of material topics	Stakeholder Management & Engagement - Materiality Analysis / Fair Employment and Equal Opportunities
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Fair Employment and Equal Opportunities / Human Resources Performance Data The organization is examining the collection and incorporation of further numerical data on employee hires and turnover in the next report.
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Additional Information for GRI Indicators - Employee Benefits
	401-3 Parental leave	Fair Employment and Equal Opportunities / Human Resources Performance Data
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Fair Employment and Equal Opportunities / Employment / Human Resources Performance Data The organization is examining the collection and incorporation of further numerical data on gender and age group by type of work in the next report.
	405-2 Ratio of basic salary and remuneration of women to men	Fair Employment and Equal Opportunities



APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS		DISCLOSURE	SECTION
Material issue: Employee Health, Safety and Wellness			
GRI 3: Material Topics 2021	3-3 Management of material topics	Key Achievements and Targets / Stakeholder Management & Engagement - Materiality Analysis / Health and Safety	
GRI 403: Occupational Health and Safety 2018 Management approach disclosures	403-1 Occupational health and safety management system	Health and Safety	
	403-2 Hazard identification, risk assessment, and incident investigation	Health and Safety	
	403-3 Occupational health services	Health and Safety	
	403-4 Worker participation, consultation, and communication on occupational health and safety	Health and Safety	
	403-5 Worker training on occupational health and safety	Health and Safety	
	403-6 Promotion of worker health	Health and Safety	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Health and Safety / Responsible Purchasing and Supply Chain Management	
GRI 403: Occupational Health and Safety 2018 Topic-specific disclosures	403-9 Work-related injuries	<p>Risks and uncertainties for the next year - Health and Safety in the workplace / Health and Safety / 2022 Performance / Human Resources Performance Data</p> <p>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). Concerning the data for "the external workforce whose work and / or workplace is controlled by the organization- first level of cooperation and / or according to the terms of the agreements", for 2022, data are collected and presented for the external/outsourced employees of companies of the OTE Group. Moreover, 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. The total number of fatalities, of high-consequence work-related injuries, the fatality rate, the rate of high-consequence work-related injuries (excluding fatalities) and the occupational disease rate of workers who are not employees for OTE Group in 2022 is zero (0). The total number of workers who are not employees injured is 17, while the injury rate and the recordable work-related injuries (including fatalities) rate is 0.44, and the lost day rate is 5.07. The assumptions and calculation methods used are the same as the ones for OTE Group's own employees</p>	
Material issue: Data Security and Privacy			
GRI 3: Material Topics 2021	3-3 Management of material topics	Stakeholder Management & Engagement - Materiality Analysis / Business Security and Data Privacy	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Business Security and Data Privacy	
Material issue: Risk Management and Business Continuity			
GRI 3: Material Topics 2021	3-3 Management of material topics	Stakeholder Management & Engagement - Materiality Analysis / Enterprise Risk Management / Business Continuity	



APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS	DISCLOSURE	SECTION
Material issue: Electromagnetic Field (EMF) Safety and Management		
GRI 3: Material Topics 2021	3-3 Management of material topics	Key Achievements and Targets / Stakeholder Management & Engagement - Materiality Analysis / Electromagnetic Fields / Additional Information for GRI Indicators
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Electromagnetic Fields / Communication with Customers
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Electromagnetic Fields / Communication with Customers
Material Issue: Customer Communication and Satisfaction		
GRI 3: Material Topics 2021	3-3 Management of material topics Results of surveys measuring customer satisfaction	Stakeholder Management & Engagement - Materiality Analysis / Communication with Customers / Customer Service and Satisfaction
Material Issue: Safe and Responsible Products and Services		
GRI 3: Material Topics 2021	3-3 Management of material topics	Stakeholder Management & Engagement - Materiality Analysis / Safe and Responsible Use of Technology / Communication with Customers
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	Communication with Customers
	417-2 Incidents of non-compliance concerning product and service information and labeling	Communication with Customers
	417-3 Incidents of non-compliance concerning marketing communications	Communication with Customers
Other issues		
Economic Performance		
GRI 201 Economic Performance 2016	201-1 Direct economic value generated and distributed	Key Achievements and Targets / Economic Value Distribution
	201-2 Financial implications and other risks and opportunities due to climate change	Environmental Strategy / Energy and Climate Change / Products and Services for Sustainability



APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS	DISCLOSURE	SECTION
Market Presence		
GRI 202 Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Fair Employment and Equal Opportunities
	202-2 Proportion of senior management hired from the local community	Employee Selecting, Attracting and Retaining 97% of Chief Officers and Executive Directors are local citizens.
Indirect Economic Impacts		
GRI 203 Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Electromagnetic Fields / Other Environmental Aspects / Connectivity for All / Overall Social Contribution
	203-2 Significant indirect economic impacts	Key Achievements and Targets / Products and Service for Sustainability / Connectivity for All / Overall Social Contribution / Digital Inclusion for all
Procurement Practices		
GRI 204 Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Responsible Purchasing and Supply Chain Management
Tax		
GRI 207: Tax 2019	207-1 Approach to tax	Annual Financial Report 2022 (23. INCOME TAXES – DEFERRED TAXES, p.158)
	207-2 Tax governance, control, and risk management	
	207-4 Country-by-country reporting	
Materials		
GRI 301 Materials 2016	301-1 Materials used by weight or volume	Circular Economy OTE Group companies are not actually manufacturing any products themselves but provide telecommunications services and therefore their use of materials is restricted to paper, packaging materials (for the products placed in the market). OTE Group, as described in the OTE Group Supplier Code of Conduct, requires its suppliers to take a precautionary approach towards environmental challenges, use resources responsibly and to limit, or avoid where possible, the use of rare resources. Conflict minerals are also addressed in the OTE Group Supplier Code of Conduct.
	301-2 Recycled input materials used	
	301-3 Reclaimed products and their packaging materials	Circular Economy Quantities collected (and forwarded for recycling) in Groups' retail network are not limited to OTE Group products, while OTE Group products are also collected in collection points established within other retail outlets, and therefore it is not possible to estimate the percentage of products sold that are actually reclaimed. OTE Group companies are implementing a product packaging monitoring program for their products distributed in the market, and participate in systems for the management of packaging materials waste, as foreseen by national and European legislation. Therefore, it is not possible for OTE Group companies to know the actual quantities of their packaging materials reclaimed and recycled, as it is the responsibility of these systems to do so.



APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS		DISCLOSURE	SECTION
Water			
GRI 303 Water 2016	303-3 Water withdrawal	<p>Circular Economy Water consumed is acquired solely from public water companies which are responsible not only for water supply but also for the sustainable uptake of water from the available water resource systems. Thus, water sources are not significantly affected by OTE Group activities.</p>	
	303-4 Water discharge		
	303-5 Water consumption		
Biodiversity			
GRI 304 Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	<p>Other Environmental Aspects</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"> • Potential impacts are mainly related to the operation of installations in isolated areas necessary for the reliable provision of telecommunication services (energy consumption, EMF emissions) and infrastructure works for upgrading / maintaining telecommunication network (waste generation). • All potential impacts are addressed in the Environmental Impact Assessment studies carried out and submitted for approval to the designated authorities as foreseen by national legislation in force. In these studies, special reference is made to protected areas (NATURA, SPA, RAMSAR, CORINE, IBA) and areas of high biodiversity value that are near to the activities of OTE Group companies. The contents of these studies and the approval process, that includes a public consultation phase, are specified in the relevant legislative acts. These studies, on the basis of current scientific knowledge, conclude that impacts on biodiversity are not material, and therefore there are no protected and / or restored habitat areas that are affected by the operation of OTE Group. • In the case of smaller base stations installed in protected areas, an Environmental Impact Assessment is not required. In these cases, a Statement of Standard Environmental Commitments is submitted to the Hellenic Telecommunications & Post Commission accompanied by a Special Environmental Assessment’. • The majority of the installations are small, without permanent personnel and with limited transportation activities at the operational stage. 	
	304-2 Significant impacts of activities, products, and services on biodiversity		
	304-3 Habitats protected or restored		
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations		
Waste			
GRI 306 Waste 2020	306-3 Waste generated	<p>Circular Economy / Environmental Performance Data – Waste There were no significant spills during the management of batteries and lubricants.</p>	
	306-4 Waste diverted from disposal		
	306-5 Waste directed to disposal		



APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS	DISCLOSURE	SECTION
Supplier Environmental Assessment		
GRI 308 Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Responsible Purchasing and Supply Chain Management
	308-2 Negative environmental impacts in the supply chain and actions taken	Responsible Purchasing and Supply Chain Management
Labor/Management Relations		
GRI 402 Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	Fair Employment and Equal Opportunities
Employee training and skills development		
GRI 404 Training and Education 2016	404-1 Average hours of training per year per employee	Employee Training and Skills Development / Human Resources Performance Data
	404-2 Programs for upgrading employee skills and transition assistance programs	Employee Selecting, Attracting and Retaining / Employee Training and Skills Development
	404-3 Percentage of employees receiving regular performance and career development reviews	Employee Selecting, Attracting and Retaining
Non-discrimination		
GRI 406 Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Human Rights Management
Freedom of Association and Collective Bargaining		
GRI 407 Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Fair Employment and Equal Opportunities / Human Rights Management / Responsible Purchasing and Supply Chain Management / OTE Group Code of Human Rights and Social Principles / OTE Group Policy on Employee Relations



APPENDIX | GLOBAL REPORTING INITIATIVE CONTENT INDEX

GRI STANDARDS	DISCLOSURE	SECTION
Child Labor		
GRI 408 Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Human Rights Management / Responsible Purchasing and Supply Chain Management / OTE Group Code of Human Rights and Social Principles / OTE Group Policy on Employee Relations
Forced or Compulsory Labor		
GRI 409 Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Human Rights Management / Responsible Purchasing and Supply Chain Management / OTE Group Code of Human Rights & Social Principles
Local Communities		
GRI 413 Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Overall Social Contribution
	413-2 Operations with significant actual and potential negative impacts on local communities	Electromagnetic Fields / Other Environmental Aspects / Overall Social Contribution Environmental protection expenditures for 2022 amounted to about € 2.1 million and cover waste treatment, management and disposal, environmental impact assessment studies, external certification of environmental management systems and measurements on electromagnetic fields.
Supplier Social Assessment		
GRI 414 Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Responsible Purchasing and Supply Chain Management
	414-2 Negative social impacts in the supply chain and actions taken	Responsible Purchasing and Supply Chain Management
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 2-28)

ORGANIZATION / INITIATIVE	COMPANY	PARTICIPATION TYPE
Greece		
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 Academy	Member since 2014.
The Sustainable Greece 2020 Initiative	OTE - COSMOTE	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 (EECT)	COSMOTE	Founding member since 2008.
Federation of Hellenic Information Technology and Communications, Enterprises (SEPE)	OTE	Member since 1998.
Romania		
Association of Mobile Operators in Romania	Telekom Romania Mobile Communications	Founding member since 2008
American Chamber of Commerce in Romania	Telekom Romania Mobile Communications	Member since 2022
German-Romanian Chamber of Industry and Commerce	Telekom Romania Mobile Communications	Member since 2022
Foreign Investors Council	Telekom Romania Mobile Communications	Member since 2017



APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

ORGANIZATION / INITIATIVE	COMPANY	PARTICIPATION TYPE
Europe		
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	Participation since 2013, as member of Deutsche Telekom Group.
	COSMOTE	
	Telekom Romania Mobile Communications	
European Memorandum for Safer Mobile Use by children and younger teenagers	COSMOTE	Participant since 2007.
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.

Primary Stakeholders (Relevant for GRI Standards 2-29)

PRIMARY STAKEHOLDERS OTE AND COSMOTE		
Customers and Prospective Customers	Business	Organizations of science, research & education
Youngsters and young adults	ATHEX-listed companies	CR and sustainability research institutions
Families	Other large corporations	Public Policy and business research institutions
Middle-aged people	Small and medium-sized enterprises	Universities
Senior citizens	Trade and industry associations	Schools
Small and medium-sized enterprises	Co-operation partners, subsidiaries	Student organizations and university associations
Large corporations	Competitors	Technology and Innovation Research Institutions
Telecommunications Service Providers		ICT SMEs
Public authorities	Media	
Consumer organizations and interest groups	Daily and weekly newspapers	State / Government entities
	Newswires and press agencies	State institutions
NGOs and interest groups	TV and radio	Embassies and consulates
Humanitarian organizations and charities	Internet, news sites and other interest	Supervisory and regulatory authorities
Business ethics groups	Social media and blogs	Communities, local authorities and their representatives
Foundations	Journalist associations / media groups	International organizations
Environmental protection organizations	Ownership and media commercial executives	EU level entities
Business non-governmental organizations		
CR related organizations	Suppliers	Shareholders, bondholders, investors and analysts
	First-tier suppliers	Shareholders
Employees and Their Representatives	Sub-suppliers	Bondholders
Employees	Auditors and certification bodies	Financial institutions
Board of Directors	Consultants	Private investors
Management Board		Funds, asset managers and analysts
Management Team		Rating agencies
Unions and work councils		Analyst organizations and associations
Applicants and prospective employees		Institutional investors
Scholars and trainees / interns		
Universities / students		



APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

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



APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

PRIMARY STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
Science, research and education	Meetings	Frequently	<ul style="list-style-type: none"> • New technology products and services • Communication safety • Technology awareness 	<p>Products and Services for Sustainability</p> <p>Safe and Responsible Use of Technology</p> <p>Overall Social Contribution</p>
	Conference calls	Ongoing		
	E-mails	Ongoing		
	Dissemination activities (workshops, conferences, etc.)	Frequently		
	Conferences	Ongoing		
	Surveys	Ongoing		
	Sustainability Report	Annual		
NGOs and interest groups	Meetings	Bi-annually	<ul style="list-style-type: none"> • Importance of adopting CR • Internet Safety public education • Support for vulnerable groups and charities • Social Contribution • EMF, Biodiversity • Environmental performance 	Integrated Report (all sections)
	Sustainability surveys	Annual		
	Conferences	Ongoing		
	E-mails	Ongoing		
	Working groups	Ongoing		
	Consultation	Ongoing		
	Sustainability Report	Annual		
Media	Announcements / Press releases	Ongoing	<ul style="list-style-type: none"> • Management • HR issues • Industry developments and market structure • Technology advances/network infrastructure • New product launches • TV market • Technology and telecommunications • Business and finance policies • Culture • CR 	Integrated Report (all sections)
	Informational material	Ongoing		
	Events / Press conferences	Ongoing		
	Other media contacts	Ongoing		
	Sustainability surveys	Annual		
	Sustainability Report	Annual		

APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

PRIMARY STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
State / Government entities	Consultations on proposed laws and regulatory frameworks for telecommunication markets	Ongoing	<ul style="list-style-type: none"> • Implementation of regulatory measures applying to OTE • Issues of effective regulatory adjustment • Specialized national goals for European Digital Agenda Strategy • Transparency • Governance • Economic growth • Energy and environment • Infrastructure construction and maintenance • Social security 	<p>OTE Group Compliance Management Connectivity for All Communication with Customers Overall Social Contribution Environmental Strategy Corporate Governance Structure and Members</p>
	Written or verbal communication with regulatory and public sector bodies	Ongoing		
	Dialogue with representatives of national and local authorities	Ongoing		
	Sustainability surveys	Annual		
	Attendance in associations and unions	Ongoing		
	Systematic liaison with local authorities (mostly regional)	Ongoing		
	Sustainability Report	Annual		
Employees, prospective employees and their representatives	OTE Group companies' Intranets	Ongoing	<ul style="list-style-type: none"> • Labor cost rationalization and alignment • Organizational effectiveness • Collective Bargaining Agreements • Fair employment policy (diversity, work life balance, nondiscrimination, equal opportunities) • Health and safety • Employee development • Leadership • Training • Performance management • Recruitment • Talent management • Engagement and satisfaction • Employees benefits • Corporate volunteerism • Strategy and all corporate information dissemination • Compliance issues • Security matters 	<p>Sustainable Business Model Human Rights Management Business Security and Data Privacy Employees Employee Volunteering</p>
	Decisions on all important Company issues	Ongoing		
	Meetings with employees	Ongoing		
	Negotiations with unions and work councils	Periodic		
	Emails from the CEO-Chairman and General Directors	Periodic		
	Employee satisfaction surveys	Biennial		
	Employee surveys results roll out and follow up process	Periodic		
	Sustainability surveys	Annual		
	Events	Periodic		
	Performance appraisal system	Annual		
	Trainings	Ongoing		
	Feedback tools	Ongoing		
	Other surveys	Annual		
	Workshops / labs	Periodic		
	Formal company policies / processes	Ongoing		
	Newsletter (electronic)	Bi-weekly		
	Internal Communication Campaigns	Ongoing		
Sustainability Report	Annual			



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	Ongoing	<ul style="list-style-type: none"> • Tender criteria and competitions • Communication on supplies issues • Transparency • Market Policy • Economic growth • Inserting CR criteria, including environmental criteria • Procurement best practices • Procurement trends 	<p>OTE Group Responsible Purchasing and Supply Chain Management</p>
	Attendance in sector-based unions	Ongoing		
	Meetings	Ongoing		
	Sustainability surveys	Annual		
	Suppliers' evaluation	Ongoing		
	Negotiations	Ongoing		
	Presentation of new products	Ongoing		
	Consultation and dialogue on technical issues	Periodic		
	Sustainability Report	Annual		
Analysts and investors	Investor Relations Department communication	Ongoing	<ul style="list-style-type: none"> • Financial performance • Short and longer term outlook • Competitive environment • Cashflow • Debt issuance and repayment • Dividends • Group strategy and results • Outlook on labor relations, regulatory decisions, economic conditions • Climate change policy 	<p>Integrated Report (all sections)</p>
	Annual General Shareholders Meeting	Annual		
	Annual, Corporate governance report and Sustainability Report	Annual		
	Sustainability surveys	Annual		
	Participation in corporate responsibility ratings	Ongoing		
	Private meetings	Ongoing		
	Conference Calls	Quarterly		
	Meetings of executives	Ongoing		
	Adoption and implementation of policies and principles	Ongoing		
	Daily collaboration	Ongoing		
	Conferences arranged by brokers	Regularly		
	Dedicated Website (www.otewholesale.gr)	Ongoing		
	Sales Department	Ongoing		
	OTE Systems presentations to telecom provider	Ongoing		
	Special mail box (otewholesale@ote.gr)	Ongoing		
	Press Releases	Ongoing		
	Corporate announcements	Ongoing		



APPENDIX | ADDITIONAL INFORMATION FOR GRI INDICATORS

Integrated Management System (Relevant for GRI Standard 2-23)

MANAGEMENT SYSTEM CERTIFICATIONS	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 System, 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	●	●	●	●	●			●
Whistleblowing Management System, as per ISO 37002	●	●	●	●	●			
Road Traffic Safety Management System, as per ISO 39001	●	●						
Educational Organizations Management System, as per ISO 21001				●				
General Requirements for the Competence of Testing and Calibration Laboratories, as per ISO 17025		●						
System of Principles and Good Practice Guidelines for the Distribution of Medical Devices	●	●		●				
National Industrial Security Certification (EKBA)	●	●						
ISAE 3402 Type 2 Reports (Assurance reports on controls at a service organization') and ISAE 3000 Type 2 Reports (Assurance Engagements other than Audits or Reviews of Historical Financial Information)	●	●						

* OTE GLOBE, OTE Academy & Telekom Romania Mobile Communications are not included in the Integrated Management System

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 2022

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
- Issuance 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

Family

- Allowance for childcare 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
- 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 parental leave for childcare
- 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 2022

Free Time - Vacation

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

Wellness programs

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

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)
- **Padel games** (between employees of our company)
- **Running team** (for 5/10/42 km)
- **Outdoor training**

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:**

- **Health Days** targeted in physical and mental health. Employees had the opportunity to visit booths for Medical Checkup, consultation by psychologists on issues that may concern them in daily life (resilience, self-care, sleep), stress relief via Neck Massage sessions and lipometry or oxidative stress measurements by expert Nutritionists.
- **Mind and Nourishment** care webinars with expertise nutritionists and psychologists for all employees
- Webinars targeted in **handling specialized health issues** (topics related to Covid-19, Monkey pox, Menopause or Breast Cancer)
- Provision of special price offers that can be accessed through various sport and wellness providers

Employee Support and Counseling

- **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 (e.g. Resilience, Emotions management, Behavioral Risk Assessment, Violence and harassment).

HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources	Unit	Greece			Romania			OTE Group		
		2020	2021	2022	2020	2021	2022	2020	2021	2022
Total Workforce (Headcount on 31st of December)	Number	11,162	10,162	9,835	999	876	879	12,161	11,038	10,714
Employment Type										
Full - time dependent employment with indeterminant period of time contracts	Number (%)	10,815 (96.9%)	9,859 (97%)	9,610 (97.7%)	977 (97.8%)	859 (98.1%)	866 (99%)	11,792 (97%)	10,718 (97.1%)	10,476 (97.8%)
Part - time dependent employment with indeterminant period of time contracts	Number (%)	308 (2.8%)	242 (2.4%)	174 (1.8%)	0 (0%)	2 (0.2%)	2 (0.2%)	308 (2.5%)	244 (2.2%)	176 (1.6%)
Dependent employment, on fixed-term	Number (%)	39 (0.3%)	61 (0.6%)	51 (0.5%)	22 (2.2%)	15 (1.7%)	11 (1.3%)	61 (0.5%)	76 (0.7%)	62 (0.6%)
Gender										
Male	Number (%)	6,894 (62%)	6,262 (62%)	6,040 (61%)	364 (36%)	356 (41%)	323 (37%)	7,258 (60%)	6,618 (60%)	6,363 (59%)
Female	Number (%)	4,268 (38%)	3,900 (38%)	3,795 (39%)	635 (64%)	520 (59%)	556 (63%)	4,903 (40%)	4,420 (40%)	4,351 (41%)
Age										
Under 30 years	Number (%)	434 (4%)	196 (2%)	187 (2%)	213 (21%)	131 (15%)	103 (12%)	647 (5%)	327 (3%)	290 (3%)
Between 31 and 50 years	Number (%)	8,470 (76%)	7,920 (78%)	7,516 (76%)	729 (73%)	673 (77%)	700 (80%)	9,199 (76%)	8,593 (78%)	8,216 (77%)
Over 51 years	Number (%)	2,258 (20%)	2,046 (20%)	2,132 (22%)	57 (6%)	72 (8%)	76 (9%)	2,315 (19%)	2,118 (19%)	2,208 (21%)
Number of Employees - By Employee Seniority										
Total no of employees included in the top 10% of empl. by total compensation	Number	1,112	1,017	984	100	88	81	1,212	1,105	1,065
Male	Number (%)	786 (71%)	731 (72%)	710 (72%)	36 (36%)	56 (64%)	45 (56%)	822 (68%)	787 (71%)	755 (71%)
Female	Number (%)	326 (29%)	286 (28%)	274 (28%)	64 (64%)	32 (36%)	36 (44%)	390 (32%)	318 (29%)	310 (29%)
Total no of employees incl. in the bottom 90% of empl. by total compensation	Number	10,050	9,145	8,851	899	788	798	10,949	9,933	9,649
Male	Number (%)	6,107 (61%)	5,531 (60%)	5,330 (60%)	328 (36%)	300 (38%)	278 (35%)	6,435 (59%)	5,831 (59%)	5,608 (58%)
Female	Number (%)	3,943 (39%)	3,614 (40%)	3,521 (40%)	571 (64%)	488 (62%)	520 (65%)	4,514 (41%)	4,102(41%)	4,041 (42%)
Responsibility level										
Employees with position of responsibility ¹	Number (%)	1,474 (13%)	1,696 (17%)	1,434 (15%)	69 (7%)	89 (10%)	87 (10%)	1,543 (13%)	1,785 (16%)	1,521 (14%)
Male	Number (%)	1,036 (70%)	1,110 (65%)	982 (68%)	43 (62%)	47 (53%)	47 (54%)	1,079 (70%)	1,157 (65%)	1,029 (68%)
Female	Number (%)	438 (30%)	586 (35%)	452 (32%)	26 (38%)	42 (47%)	40 (46%)	464 (30%)	628 (35%)	492 (32%)
Employess without position of responsibility	Number (%)	9,688 (87%)	8,466 (83%)	8,401 (85%)	930 (93%)	787 (90%)	792 (90%)	10,618 (87%)	9,253 (84%)	9,193 (86%)
Male	Number (%)	5,858 (60%)	5,152 (61%)	5,058 (60%)	321 (35%)	309 (39%)	276 (35%)	6,179 (58%)	5,461 (59%)	5,334 (58%)
Female	Number (%)	3,830 (40%)	3,314 (39%)	3,343 (40%)	609 (65%)	478 (61%)	516 (65%)	4,439 (42%)	3,792 (41%)	3,859 (42%)



APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources	Unit	Greece			Romania			OTE Group		
		2020	2021	2022	2020	2021	2022	2020	2021	2022
Type of Work										
Office	Number (%)	6,964 (62%)	5,871 (58%)	5,692 (58%)	357 (36%)	159 (18%)	167 (19%)	7,321 (60%)	6,030 (55%)	5,859 (55%)
Retail	Number (%)	1,042 (9%)	811 (8%)	811 (8%)	556 (56%)	442 (50%)	555 (63%)	1,598 (13%)	1,253 (11%)	1,366 (13%)
Fieldwork/other	Number (%)	3,156 (28%)	3,480 (34%)	3,332 (34%)	86 (9%)	275 (31%)	157 (18%)	3,242 (27%)	3,755 (34%)	3,489 (33%)
Employees with special needs	Number (%)	300 (2.7%)	207 (2%)	196 (2%)	3 (0.3%)	2 (0.2%)	5 (1%)	303 (2.5%)	209 (1.9%)	201 (2%)
Employees covered by enterprise collective labor agreements	Number (%)	9,027 (81%)	9,729 (96%)	9,499 (97%)	999 (100%)	876 (100%)	879 (100%)	10,026 (82%)	10,605 (96%)	10,378 (97%)
Headcount (Yearly) Average	Number	11,605	10,416	10,100	1,062	853	844	12,666	11,268	10,944
Male	Number (%)	7,082 (61%)	6,386 (61%)	6,199 (61%)	388 (37%)	346 (41%)	338 (40%)	7,470 (59%)	6,732 (60%)	6,537 (60%)
Female	Number (%)	4,523 (39%)	4,030 (39%)	3,900 (39%)	673 (63%)	507 (59%)	506 (60%)	5,196 (41%)	4,537(40%)	4,407 (40%)
Total hours worked (on the basis of headcount avg)²	Number	21,405,720	19,803,126	19,422,465	1,898,620	1,693,004	1,457,712	23,304,340	21,496,130	20,880,177
Total workforce on indeterminant period of time contracts	Number	11,123	10,101	9,784	977	861	868	12,100	10,962	10,652
Employment type										
Full- time	Number (%)	10,815 (97%)	9,859 (98%)	9,610 (98%)	977 (100%)	859 (100%)	866 (99.8%)	11,792 (97%)	10,718 (98%)	10,476 (98%)
Part- time	Number (%)	308 (3%)	242 (2%)	174 (2%)	0 (0%)	2 (0%)	2 (0.2%)	308 (3%)	244 (2%)	176 (2%)
Gender										
Male	Number (%)	6,861 (62%)	6,215 (62%)	5,998 (61%)	352 (36%)	349 (41%)	316 (36%)	7,213 (60%)	6,564 (60%)	6,314 (59%)
Female	Number (%)	4,262 (38%)	3,886 (38%)	3,786 (39%)	625 (64%)	512 (59%)	552 (64%)	4,887 (40%)	4,398 (40%)	4,338 (41%)
Responsibility level										
Employees with position of responsibility¹	Number (%)	1,473 (13%)	1,696 (17%)	1,433 (15%)	67 (7%)	76 (9%)	87 (10%)	1,540 (13%)	1,772 (16%)	1,520 (14%)
Male	Number (%)	1,035 (70%)	1,111 (66%)	981 (68%)	41 (61%)	43 (57%)	47 (54%)	1,076 (70%)	1,154 (65%)	1,028 (68%)
Female	Number (%)	438 (30%)	585 (34%)	452 (32%)	26 (39%)	33 (43%)	40 (46%)	464 (30%)	618 (35%)	492 (32%)
Employess without position of responsibility	Number (%)	9,650 (87%)	8,405 (83%)	8,351 (85%)	910 (93%)	770 (89%)	781 (90%)	10,560 (87%)	9,175 (84%)	9,132 (86%)
Male	Number (%)	5,826 (60%)	5,104 (61%)	5,017 (60%)	311 (34%)	300 (39%)	269 (34%)	6,137 (58%)	5,404 (59%)	5,286 (58%)
Female	Number (%)	3,824 (40%)	3,301 (39%)	3,334 (40%)	599 (66%)	470 (61%)	512 (66%)	4,423 (42%)	3,771 (41%)	3,846 (42%)
Type of Work										
Office	Number (%)	6,938 (62%)	5,835 (58%)	5,655 (58%)	342 (35%)	135 (16%)	167 (19%)	7,280 (60%)	5,970 (54%)	5,822 (55%)
Retail	Number (%)	1,042 (9%)	811 (8%)	811 (8%)	550 (56%)	513 (60%)	551 (63%)	1,592 (13%)	1,324 (12%)	1,362 (13%)
Fieldwork/other	Number (%)	3,143 (28%)	3,455 (24%)	3,318 (34%)	85 (9%)	304 (35%)	150 (17%)	3,228 (27%)	3,759 (34%)	3,468 (33%)
Total workforce on full- time indeterminant period of time contracts	Number	10,816	9,859	9,610	977	859	866	11,793	10,718	10,476
Gender										
Male	Number (%)	7,153 (61%)	6,170 (63%)	5,968 (62%)	353 (36%)	349 (41%)	315 (36%)	7,153 (61%)	6,519 (61%)	6,283 (60%)
Female	Number (%)	4,640 (39%)	3,689 (37%)	3,642 (38%)	635 (64%)	510 (59%)	551 (64%)	4,640 (39%)	4,199 (39%)	4,193 (40%)

APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources	Unit	Greece			Romania			OTE Group		
		2020	2021	2022	2020	2021	2022	2020	2021	2022
Total workforce on part-time indeterminant period of time contracts	Number	308	242	174	0	2	2	308	244	176
Gender										
Male	Number (%)	60 (19%)	45 (19%)	30 (17%)	0 (0%)	0 (0%)	1 (50%)	60 (19%)	45 (18%)	31 (18%)
Female	Number (%)	248 (81%)	197 (81%)	144 (83%)	0 (0%)	2 (100%)	1 (50%)	248 (81%)	199 (82%)	145 (82%)
Recruitment³	Number	116 (1%)	875 (8%)	349 (3%)	44 (4%)	40 (5%)	64 (8%)	160 (1%)	915 (8%)	413 (4%)
Gender										
Male	Number (%)	89 (77%)	348 (40%)	218 (62.5%)	24 (55%)	12 (30%)	31 (48%)	113 (71%)	360 (39%)	249 (60%)
Female	Number (%)	27 (23%)	527 (60%)	131 (37.5%)	20 (45%)	28 (70%)	33 (52%)	47 (29%)	555 (61%)	164 (40%)
Age										
Under 30 years	Number (%)	52 (45%)	102 (12%)	87 (25%)	20 (45%)	11 (28%)	18 (28%)	72 (45%)	113 (12%)	105 (25%)
Between 31 and 50 years	Number (%)	64 (55%)	621 (71%)	255 (73%)	21 (48%)	26 (65%)	38 (59%)	85 (53%)	647 (71%)	293 (71%)
Over 51 years	Number (%)	0 (0%)	152 (17%)	7 (2%)	3 (7%)	3 (8%)	8 (13%)	3 (2%)	155 (17%)	15 (4%)
Recruitment within OTE Group	Number (%)	22 (19%)	692 (79%)	179 (51%)	4 (9%)	0 (0%)	0 (0%)	26 (16%)	692 (76%)	179 (43%)
Departures⁴	Number (%)	1,084 (9%)	1,325 (13%)	612 (6%)	170 (16%)	170 (20%)	169 (20%)	1,254 (10%)	1,495 (13%)	781 (7%)
Gender										
Male	Number (%)	614 (57%)	848 (64%)	401 (66%)	73 (43%)	66 (39%)	70 (41%)	687 (55%)	914 (61%)	471 (60%)
Female	Number (%)	470 (43%)	477 (36%)	211 (34%)	97 (57%)	104 (61%)	99 (59%)	567 (45%)	581 (39%)	310 (40%)
Age										
Under 30 years	Number (%)	57 (5%)	80 (6%)	30 (5%)	47 (28%)	45 (26%)	39 (23%)	104 (8%)	125 (8%)	69 (9%)
Between 31 and 50 years	Number (%)	526 (49%)	677 (51%)	368 (60%)	114 (67%)	119 (70%)	114 (67%)	640 (51%)	796 (53%)	482 (62%)
Over 51 years	Number (%)	501 (46%)	568 (43%)	214 (35%)	9 (5%)	6 (4%)	16 (9%)	510 (41%)	574 (38%)	230 (29%)
Voluntary Exit Programs										
Departures in the context of voluntary exit programs	Number (%)	695 (64%)	739 (56%)	317 (52%)	9 (5%)	0 (0%)	0 (0%)	704 (56%)	739 (49%)	317 (41%)
Type of Departure										
Voluntary	Percentage	9%	12%	5%	15%	19%	18%	9%	12%	6%
Involuntary ⁴	Percentage	1%	1%	1%	1%	1%	2%	1%	1%	1%

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

2. In order to have a common basis for all Group Companies concerning the total working hours and to have comparable data for all reported years, the indicator has been calculated based on standard hours of work.

3. The percentage (rate of new employee hires) is calculated by dividing the number of hires during the year by the headcount yearly average.

4. The percentage (rate of employee turnover) is calculated by dividing the number of departures during the year by the headcount yearly average. Involuntary Departures incl. fixed-term contracts ended, dismissals, retirements, deaths.



APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources	Unit	Greece			Romania			OTE Group		
		2020	2021	2022	2020	2021	2022	2020	2021	2022
Total workforce on fixed-term contracts	Number	39	61	51	22	15	11	61	76	62
Gender										
Male	Number (%)	32 (82%)	47 (77%)	42 (82%)	12 (55%)	7 (47%)	7 (64%)	44 (72%)	54 (71%)	49 (79%)
Female	Number (%)	7 (18%)	14 (23%)	9 (18%)	10 (45%)	8 (53%)	4 (36%)	17 (28%)	22 (29%)	13 (21%)
Members of the Board of Directors	Number	10	10	10				10	10	10
Gender										
Male	Number (%)	8 (80%)	7 (70%)	7 (70%)				8 (80%)	7 (70%)	7 (70%)
Female	Number (%)	2 (20%)	3 (30%)	3 (30%)				2 (20%)	3 (30%)	3 (30%)
Age										
Under 30 years	Number (%)	0 (0%)	0 (0%)	0 (0%)				0 (0%)	0 (0%)	0 (0%)
Between 31 and 50 years	Number (%)	3 (30%)	3 (30%)	2 (20%)				3 (30%)	3 (30%)	2 (20%)
Over 51 years	Number (%)	7 (70%)	7 (70%)	8 (80%)				7 (70%)	7 (70%)	8 (80%)
Members of OTE Group Management Team	Number	14	14	14				14	14	14
Gender										
Male	Number (%)	11 (79%)	11 (79%)	11 (79%)				11 (79%)	11 (79%)	11 (79%)
Female	Number (%)	3 (21%)	3 (21%)	3 (21%)				3 (21%)	3 (21%)	3 (21%)
Age										
Under 30 years	Number (%)	0 (0%)	0 (0%)	0 (0%)				0 (0%)	0 (0%)	0 (0%)
Between 31 and 50 years	Number (%)	3 (21%)	3 (21%)	2 (14%)				3 (21%)	3 (21%)	2 (14%)
Over 51 years	Number (%)	11 (79%)	11 (79%)	12 (86%)				11 (79%)	11 (79%)	12 (86%)

APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources	Unit	Greece			Romania			OTE Group		
		2020	2021	2022	2020	2021	2022	2020	2021	2022
Health and Safety Issues										
Fatalities ⁵ (number of employees)	Number	0	0	0	0	0	0	0	0	0
Number of recordable work-related injuries (incl. fatalities)	Number	79	62	77	1	1	1	80	63	78
Male	Number (%)	61 (77%)	47 (76%)	63 (82%)	0 (0%)	1 (100%)	1 (100%)	61 (76%)	48 (76%)	64 (82%)
Female	Number (%)	18 (23%)	15 (24%)	14 (18%)	1 (100%)	0 (0%)	0 (0%)	19 (24%)	15 (24%)	14 (18%)
Number of employees injured	Number	78	59	73	1	1	1	79	60	74
Male	Number (%)	60 (77%)	45 (76%)	62 (85%)	0 (0%)	1 (100%)	1 (100%)	60 (76%)	46 (77%)	63 (85%)
Female	Number (%)	18 (23%)	14 (24%)	11 (15%)	1 (100%)	0 (0%)	0 (0%)	19 (24%)	14 (23%)	11 (15%)
Number of high-consequence work-related injuries	Number	0	0	0	0	1	1	0	1	1
Injury rate ⁶	Number	0.73	0.00	0.79	0.11	0.12	0.14	0.68	0.59	0.75
Male	Number	0.98	0.00	1.04	0.00	0.30	0.34	0.93	0.74	1.01
Female	Number	0.34	0.00	0.38	0.17	0.00	0.00	0.32	0.35	0.34
Recordable work-related injuries (including fatalities) rate ⁷	Number	0.73	0.63	0.79	0.11	0.12	0.14	0.68	0.59	0.75
Male	Number	0.98	0.77	1.04	0.00	0.30	0.34	0.93	0.74	1.01
Female	Number	0.34	0.40	0.38	0.17	0.00	0.00	0.32	0.35	0.34
Occupational disease rate ⁸	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 ⁹	Number	21.21	14.25	15.10	0.00	4.73	8.92	19.48	13.50	14.66
Male	Number	28.56	18.94	21.44	0.00	11.83	22.28	27.13	18.57	21.48
Female	Number	9.56	6.59	4.51	0.00	0.00	0.00	8.35	5.81	4.02
Rate of high-consequence work-related injuries (excluding fatalities)	Number	0	0	0	0	0.00	0	0	0.00	0
Absentee rate ¹⁰	Number	662.64	414.55	443.44	1,023.51	534.33	647.83	689.77	423.58	624.45

5. Fatal work accidents do not contain incidents from strictly natural causes.

6. 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.

7. 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.

8. 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.

9. 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.

10. 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		
		2020	2021	2022	2020	2021	2022	2020	2021	2022
Health and Safety Issues										
Hours of psychological support consulting services	Hours	1,451	912	1,104	0	0	0	1,451	912	1,104
Training on Health and Safety issues (total hours)	Hours	3,540	5,615	9,595	5,536	5,964	7,502	9,076	11,579	17,097
Training on Health and Safety issues (on the basis of headcount avg)	Hrs per employee	0.31	0.54	0.95	5.21	7.00	8.89	0.72	1.03	1.56
Training on Safety issues (total employee participations)	Number	283	968	1,269	1,937	2,354	2,721	2,220	3,322	3,990
Male	Number (%)	270 (95%)	861 (89%)	320 (35%)	848 (44%)	900 (38%)	1,141 (42%)	1,118 (50%)	1,761 (53%)	1,461 (37%)
Female	Number (%)	13 (5%)	107 (11%)	949 (75%)	1,089 (56%)	1,454 (62%)	1,580 (58%)	1,102 (50%)	1,561 (47%)	2,529 (63%)
Training on Safety issues (total number of employees)		242	896	1,146	1,047	939	838	1,289	1,835	1,984
Male	Number (%)	227 (94%)	789 (88%)	883 (77%)	446 (43%)	365 (39%)	345 (41%)	673 (52%)	1,154 (63%)	1,228 (62%)
Female	Number (%)	15 (6%)	107 (12%)	263 (23%)	601 (57%)	574 (61%)	493 (59%)	616 (48%)	681 (37%)	756 (38%)
Training on Health/Wellbeing issues (total employee participations)		2,358	3,062	5,497	372			2,730	3,062	5,497
Male	Number (%)	1,680 (71%)	1,105 (36%)	2,470 (45%)	35 (9%)			1,715 (63%)	1,105 (36%)	2,470 (45%)
Female	Number (%)	678 (29%)	1,957 (64%)	3,027 (55%)	337 (91%)			1,015 (37%)	1,957 (64%)	3,027 (55%)
Training on Health/Wellbeing issues (total number of employees)		1,922	1,781	3,097	62			1,984	1,781	3,097
Male	Number (%)	1,523 (79%)	713 (40%)	1,742 (56%)	17 (27%)			1,540 (78%)	713 (40%)	1,742 (56%)
Female	Number (%)	399 (21%)	1,068 (60%)	1,355 (44%)	45 (73%)			444 (22%)	1,068 (60%)	1,355 (44%)
Training on Health/Wellbeing & Safety issues (total number of participations)		2,641	4,030	6,766	2,309	2,354	2,721	4,950	6,384	9,487
Male	Number (%)	1,950 (74%)	1,966 (49%)	2,790 (41%)	883 (38%)	900 (38%)	1,141 (42%)	2,833 (57%)	2,866 (45%)	3,931 (41%)
Female	Number (%)	691 (26%)	2,064 (51%)	3,976 (59%)	1,426 (62%)	1,454 (62%)	1,580 (58%)	2,117 (43%)	3,518 (55%)	5,556 (59%)
Training on Health/Wellbeing & Safety issues (total number of employees)		2,164	2,636	4,009	1,109	939	838	3,273	3,575	4,847
Male	Number (%)	1,750 (81%)	1,470 (56%)	2,434 (61%)	463 (42%)	365 (39%)	345 (41%)	2,213 (68%)	1,835 (51%)	2,779 (57%)
Female	Number (%)	414 (19%)	1,166 (44%)	1,575 (39%)	646 (58%)	574 (61%)	493 (59%)	1,060 (32%)	1,740 (49%)	2,068 (43%)



APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources	Unit	Greece			Romania			OTE Group		
		2020	2021	2022	2020	2021	2022	2020	2021	2022
Employee training										
Total participations	Number	9,163	9,467	11,323	4,291	9,992	3,306	13,454	19,459	14,629
Gender										
Male	Number (%)	5,152 (56%)	5,685 (60%)	7,608 (67%)	1,846 (43%)	2,598 (26%)	1,124 (34%)	6,998 (52%)	8,283 (43%)	8,732 (60%)
Female	Number (%)	4,011 (44%)	3,782 (40%)	3,715 (33%)	2,445 (57%)	7,394 (74%)	2,182 (66%)	6,456 (48%)	11,176 (57%)	5,897 (40%)
Responsibility level										
Employees with position of responsibility ¹	Number (%)	1,222 (13%)	1,695 (18%)	1,902 (17%)	486 (11%)			1,708 (13%)	1,695 (9%)	1,928 (13%)
Employees without position of responsibility	Number (%)	7,941 (87%)	7,772 (82%)	9,421 (83%)	3,805 (89%)			11,746 (87%)	7,772 (40%)	12,701 (87%)
Type of Work										
Office	Number (%)	8,012 (87%)	7,401 (78%)	5,610 (50%)	1,179 (27%)			9,191 (68%)	7,401 (38%)	6,557 (45%)
Retail	Number (%)	441 (5%)	411 (4%)	954 (8%)	3,059 (71%)			3,500 (26%)	411 (2%)	2,993 (20%)
Fieldwork/other	Number (%)	708 (8%)	1,655 (17%)	4,759 (42%)	53 (1%)			761 (6%)	1,655 (9%)	5,079 (35%)
Total employees who participated in training	Number (%)	5,229 (45%)	5,202 (50%)	5,739 (57%)	780 (73%)	853 (100%)	648 (77%)	6,009 (47%)	6,055 (54%)	6,387 (58%)
Gender										
Male	Number (%)	2,867 (55%)	3,094 (59%)	3,811 (66%)	312 (40%)	222 (26%)	233 (36%)	3,179 (53%)	3,316 (55%)	4,044 (63%)
Female	Number (%)	2,362 (45%)	2,108 (41%)	1,928 (34%)	468 (60%)	631 (74%)	415 (64%)	2,830 (47%)	2,739 (45%)	2,343 (37%)
Total training hours	Number	143,007	172,816	117,214	17,646	40,461	7,302	160,653	213,277	124,516
Gender (hours)										
Male	Hours (%)	75,127 (53%)	94,867 (55%)	80,504 (69%)	9,602 (54%)	10,520 (26%)	2,454 (34%)	84,729 (53%)	105,387 (49%)	82,958 (67%)
Female	Hours (%)	67,880 (47%)	77,949 (45%)	36,710 (31%)	8,044 (46%)	29,941 (74%)	4,848 (66%)	75,924 (47%)	107,890 (51%)	41,558 (33%)
Type of work (hours)										
Office	Hours (%)	127,404 (89%)	142,085 (89%)	70,147 (60%)	8,706 (49%)		2,094 (29%)	136,110 (85%)	142,085 (71%)	72,241 (58%)
Retail	Hours (%)	6,027 (4%)	7,767 (5%)	4,297 (4%)	8,849 (50%)		4,570 (63%)	14,876 (9%)	7,767 (4%)	8,867 (7%)
Fieldwork/other	Hours (%)	9,576 (7%)	22,964 (14%)	42,770 (36%)	91 (1%)		638 (9%)	9,667 (6%)	22,964 (11%)	43,408 (35%)
Training hours average (on the basis of headcount average)	Hours per employee	12.32	16.59	11.61	16.62	47.46	8.65	12.68	18.93	11.38
Training per employee by gender (on the basis of headcount average)										
Male	Hours per employee	10.61	14.85	12.99	24.73	30.44	7.26	11.34	15.65	12.69
Female	Hours per employee	15.01	19.34	9.41	11.95	59.06	9.58	14.61	23.78	9.43



APPENDIX | HUMAN RESOURCES PERFORMANCE DATA

Performance Indicators on Human Resources	Unit	Greece			Romania			OTE Group		
		2020	2021	2022	2020	2021	2022	2020	2021	2022
Employee training										
Training per employee by type of work (on the basis of headcount on 31st December)										
Office	Hours per employee	18.29	24.20	12.32	24.39		12.54	18.59	23.56	12.33
Retail	Hours per employee	5.78	9.58	5.30	15.92		8.23	9.31	6.20	6.49
Fieldwork/other	Hours per employee	3.03	6.60	12.84	1.06		4.06	2.98	6.12	12.44
Total employee training expenditure	Euros (€)	3,263,027	4,012,198	4,120,717	NA			3,263,027	4,012,198	4,120,717
Total training hours by employee seniority										
Average training hours for employees included in the top 10% of employees by total compensation	Hours per employee	14.66	13.52	9.65	17.65		0.49	14.91	12.45	8.95
Average training hours for employees included in the bottom 90% of employees by total compensation	Hours per employee	12.61	17.39	12.17	17.67		9.10	13.02	16.01	11.92
Other data										
Internships										
University and technical school students who carried out their internship at OTE Group	Number	395	23	624	12	2	0	407	25	624
Parental leave										
Employees who made use of parental leave for childcare	Number	680	589	546	59	9	72	739	598	618
Male	Number	342	280	254	2	0	4	344	280	258
Female	Number	338	309	292	57	9	68	395	318	360
Employees who made use of parental leave without pay	Number	39	51	119	1	0	0	40	51	119
Male	Number	4	6	19	0	0	0	4	6	19
Female	Number	35	45	100	1	0	0	36	45	100
Employees who made use of parental leave for child upbringing at 1/3 pay	Number	0	0	0	0	0	0	0	0	0
Male	Number	0	0	0	0	0	0	0	0	0
Female	Number	0	0	0	0	0	0	0	0	0
Employees who returned to work after the use of parental leave	Number	561	474	504	82	7	46	643	481	550
Male	Number	337	273	255	5	0	2	342	273	257
Female	Number	224	201	249	77	7	44	301	208	293

ENVIRONMENTAL PERFORMANCE DATA

Noise and Visual Impact (Relevant for GRI Standard 305)

NOISE	VISUAL IMPACT
<p>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).</p> <ul style="list-style-type: none"> 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. 	<p>Telecommunications companies have relatively small visual impact on the environment. However, to minimize whatever impact may exist:</p> <ul style="list-style-type: none"> 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 (42 special constructions in Greece). Appropriate modifications are also applied to existing telecommunication infrastructure.

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

<ul style="list-style-type: none"> Emissions of typical air pollutants (NOx, SO2, PM10 and VOCs) are mainly related to road transportation and the use of electricity generators to support the operation of the telecom network Emissions of Persistent Organic Pollutants (POP) and Hazardous Air Pollutants (HAP) are of minor importance as: <ul style="list-style-type: none"> 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 	<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>NOx</p> <p>1,935 8,768 45,363</p> </div> <div style="text-align: center;"> <p>PM10</p> <p>183 1,277 5,566</p> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 20px;"> <div style="text-align: center;"> <p>SO2</p> <p>389 26 61</p> </div> <div style="text-align: center;"> <p>VOCs</p> <p>122 2,028 18,672</p> </div> </div> <p style="font-size: small; margin-top: 10px;">Emissions (in kg) ■ Space heating ■ Electricity generators ■ Vehicles</p>
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ENVIRONMENTAL PERFORMANCE DATA - WASTE

OTE WASTE		Greece			Romania			OTE Group		
Category	Materials / Waste streams ¹	2020	2021	2022	2020	2021	2022	2020	2021	2022
Materials / Resources consumption										
	Water (m ³)	160,084	158,535	136,825	4,972	3,961	3,637	165,056	162,496	140,462
	Paper	110,714	121,551	112,690	73,590	13,775	8,190	184,304	135,326	120,880
	Packaging materials	166,628	631,494	640,080	8,779	2,025	2,233	175,407	633,519	642,313
Total Waste²		5,363,377	3,083,142	5,019,132	420,198	535,432	613,730	5,783,575	3,618,574	5,632,862
	Hazardous	1,432,101	926,254	1,307,840	82,520	122	173,560	1,514,621	926,376	1,481,400
	Non-Hazardous	3,931,276	2,156,888	3,711,292	337,678	535,310	440,170	4,268,954	2,692,198	4,151,462
Technical		4,483,644	2,208,100	3,983,414	156,009	117,171	211,310	4,639,653	2,325,271	4,194,724
	Telecom network									
	Metals	1,328,848	950,161	563,995	22,594	54,950	37,480	1,351,442	1,005,111	601,475
	Cables	1,402,736	0	2,115,194	200	0	0	1,402,936	0	2,115,194
	WEEE ³	212,928	241,275	294,450	43,783	61,924	0	256,711	303,199	294,450
	Lead batteries	735,027	301,575	511,416	82,520	0	169,961	817,547	301,575	681,377
	Various ⁴	685,705	620,575	438,362	0	0	0	685,705	620,575	438,362
	Shops									
	Phones and accessories	26,795	28,774	25,248	1	69	3,599	26,796	28,843	28,847
	Home batteries	21,253	21,569	20,409	44	228	270	21,297	21,797	20,679
	Obsolete merchandise ⁵	68,784	42,606	12,783	6,844	0	0	75,628	42,606	12,783
	Ink-cartridges	1,569	1,566	1,558	23	0	0	1,592	1,566	1,558
Paper		74,168	103,929	204,236	13,612	2,244	8,190	87,780	106,173	212,426
	Recycling	74,168	103,929	204,236	13,612	2,244	8,190	87,780	106,173	212,426



APPENDIX | ENVIRONMENTAL PERFORMANCE DATA

OTE WASTE		Greece			Romania			OTE Group		
Category	Materials / Waste streams ¹	2020	2021	2022	2020	2021	2022	2020	2021	2022
Residual/Municipal waste		751,482	761,754	810,924	250,578	415,895	394,230	1,002,059	1,177,649	1,205,154
	Packaging materials									
	Offices	12,370	11,711	839	1,647	1,515	0	14,017	13,226	839
	Warehouses	360,695	365,200	528,091	13,919	920	0	374,614	366,120	528,091
	Municipal Solid Waste									
	Offices	218,193	159,619	109,849	235,012	413,460	394,230	453,204	573,079	504,079
	Warehouses	160,224	225,224	172,145				160,224	225,224	172,145
Other		54,083	9,359	20,558	0	122	0	54,083	9,481	20,558
	Lubricants	5,468	3,159	5,461	0	122	0	5,468	3,281	5,461
	Refrigerants and various chemicals	5,901	945	2,803	0	0	0	5,901	945	2,803
	End of life vehicles	42,714	5,255	0	0	0	0	42,714	5,255	0
	Tires and other waste	0	0	12,294	0	0	0	0	0	12,294

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

2. For 2022, hazardous waste is 70.47% recycled & 29.53% is managed by thermal recycling, while for technical waste is 100% recycled. Municipal Solid Waste are landfilled, while the remaining waste categories are recycled

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

4. Telephone poles, products out of specification, packaging with hazardous substances that are not produced on a permanent basis, photovoltaic panels

5. Quantities included are not restricted to shops

ENVIRONMENTAL PERFORMANCE DATA - ENERGY

Category		Unit	Greece			Romania			OTE Group		
			2020	2021	2022	2020	2021	2022	2020	2021	2022
Energy consumption¹		GWh	493.43	494.13	480.93	124.61	108.47	104.25	618.05	602.60	585.18
Electricity											
	Telecom network	GWh	370.71	369.42	360.50	110.00	94.90	94.66	480.71	464.32	455.17
	Buildings ²	GWh	67.37	65.69	63.03	10.52	9.03	6.27	77.89	74.72	69.30
	Vehicles	GWh			0.18						0.18
Stationary installations											
	Heating oil	GWh	3.03	2.41	2.27				3.03	2.41	2.27
	Natural gas ³	GWh	3.26	3.97	3.56	0.58	0.78	0.88	3.84	4.75	4.44
	District heating	GWh	0.31	0.36	0.35				0.31	0.36	0.35
	Diesel for electricity generators	GWh	14.70	17.56	15.07	0.11	0.09	0.15	14.81	17.65	15.22
Road transportation											
	Unleaded gasoline	GWh	9.88	10.98	12.77	0.01	0.91	1.27	9.90	11.89	14.04
	Diesel	GWh	24.17	23.74	23.20	3.39	2.77	1.01	27.56	26.51	24.21
GHG emissions⁴											
Direct emissions											
	Space heating ⁵	t CO ₂ eq	1,469	1,447	1,327	117	157	178	1,587	1,604	1,504
	Electricity generators ⁵	t CO ₂ eq	3,933	4,699	4,034	30	24	40	3,964	4,722	4,074
	Vehicles ⁵	t CO ₂ eq	8,595	8,751	9,044	873	931	569	9,468	9,682	9,613
	HFCs - AC systems ⁶	t CO ₂ eq	10,133	9,060	7,951	N.A.	N.A.	N.A.	10,133	9,060	7,951
Indirect (scope 2) emissions, location-based⁷											
	Telecom network	t CO ₂ eq	202,373	183,548	134,782	36,839	32,395	25,676	239,212	215,943	160,458
	Buildings	t CO ₂ eq	36,844	32,736	23,647	3,522	3,116	1,718	40,366	35,853	25,365
	Vehicles	t CO ₂ eq	N.A.	N.A.	67	N.A.	N.A.	N.A.	N.A.	N.A.	67
Indirect (scope 2) emissions, market-based⁷		t CO ₂ eq	66	76	68	37,599	0	0	37,665	76	68
Scope 3 emissions⁸		t CO ₂ eq	699,445	589,610	412,503	N.A.	161,965	7,981	699,445	751,575	420,484



APPENDIX | ENVIRONMENTAL PERFORMANCE DATA

			Greece			Romania			OTE Group		
Category		Unit	2020	2021	2022	2020	2021	2022	2020	2021	2022
Transport		GWh									
	Service vehicles										
	Unleaded gasoline vehicles	#	760	745	737	1	113	96	761	858	833
	Diesel vehicles	#	2010	1997	1998	340	275	104	2,350	2,272	2,102
	Distance covered	km	28,950,064	36,339,077	37,480,266	4,524,218	5,120,778	3,015,946	33,474,282	41,459,855	40,496,212
	Company vehicles										
	Unleaded gasoline vehicles	#	196	214	259	2	2	2	198	216	261
	Diesel vehicles	#	145	119	41	43	20	19	188	139	60
	Distance covered	km	5,052,504	5,241,423	5,091,667	649,832	348,604	456,901	5,702,336	5,590,027	5,548,568

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. Recalculation of 2020 and 2021 values for Greece, due to harmonization of parameters used (calorific value for natural gas) at DT Group level

4. GHG emissions calculated include CO₂, CH₄, N₂O and f-gases from AC systems. Global Warming Potential (GWP) values used, are those included in the 5th Assessment Report (AR) of IPCC.

5. 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

6. Emissions are calculated on the basis of data concerning replenished quantities

7. Location-based CO₂ 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-CO₂ (i.e. CH₄ and N₂O) emission factors for electricity derive from IEA

8. Emissions from Indirect use phase of services sold in not included in the 2022 scope 3 emissions



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	<ul style="list-style-type: none"> 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"> Buildings envelope energy upgrade Modernization of HAVC systems improving energy efficiency Energy Design of Constructural Works in buildings and selection of highly efficient E/M Equipment LED lighting systems in renovated buildings Smart metering devices and automation in lighting, air-conditioning, generators and other systems for better supervision and improvement of operational efficiency
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 (Greece only), Installation of BEMS systems in critical sites.

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>Compliance Enterprise Risks and Corporate Governance Committee Sustainability Governance 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>Compliance Enterprise Risks and Corporate Governance Committee Sustainability Governance 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>Environmental Strategy Energy and Climate Change 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>Environmental Strategy Energy and Climate Change 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.	Stakeholder Management & Engagement Enterprise Risk Management Environmental Strategy Annual Financial Report 2022 (p. 16-26, 42-44)
B) Describe the organization's processes for managing climate-related risks.	Responsible Purchasing and Supply Chain Management Business Continuity Environmental Strategy Energy and Climate Change
C) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	Stakeholder Management & Engagement Enterprise Risk Management Annual Financial Report 2022 (p. 16-26, 42-44)
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.	Energy and Climate Change Environmental Performance Data – Energy Annual Financial Report 2022 (p. 16-26, 42-44) (Initial estimate of green revenues according to EU Taxonomy principles)
B) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	Environmental Strategy Energy and Climate Change Environmental Performance Data – Energy
C) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	Key Achievements and Targets Energy and Climate Change

INDEPENDENT ASSURANCE REPORT

Independent Limited Assurance Report by Deloitte Certified Public Accountants S.A. (“Deloitte”) to the Management of Hellenic Telecommunications Organization S.A. (“OTE” or the “Company”) on specific scope of the Integrated Report 2022 (“IR 2022”) for the reporting year ended 31 December 2022.

Our assurance conclusion

Based on our procedures described in this report, and evidence we have obtained, nothing has come to our attention that causes us to believe that:

- The GRI General and Topic Disclosures, under the scope of our work, are materially misstated.
- The IR 2022 is not prepared, in all material respects, in accordance with the GRI 1: Foundation 2021 (Section 4: Reporting Principles), relating to the GRI Disclosures under the scope of our work.
- The consolidation method used to report OTE Group quantitative data, for all the GRI Topic Disclosures under the scope of our work, where applicable, is materially misstated.
- The IR 2022 does not adhere, in all material respects, to the AA1000 Account

Ability Principles (2018) and that the relevant information disclosed is materially misstated.

- The ATHEX ESG metrics, regarding environmental, social and governance (“ESG”) issues, as disclosed in the section titled “ATHEX Guide Index” in the Appendix of the IR 2022, are materially misstated, against the requirements of the Athens Stock Exchange ESG Reporting Guide 2022.
- OTE Group’s sustainability strategy as disclosed in the IR 2022, is not in alignment with the United Nations’ (UN) Sustainability Development Goals.
- The IR 2022 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.
- The quantitative data disclosed in the IR 2022, for OTE, COSMOTE, CTS, OTE GLOBE, OTE Academy, GERMANOS, COSMOTE e-Value and Telekom Romania Mobile Communications for specific non-financial indicators, as described in point (10) of the scope of work below, are materially misstated.

Scope of our work

The Company has engaged us to provide independent limited assurance on a specific scope of the IR 2022 for OTE, COSMOTE MOBILE TELECOMMUNICATIONS SINGLE MEMBER S.A. (“COSMOTE”) and selected OTE Group entities’ data, as specified below, in accordance with International Standard on Assurance Engagements 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 our agreed terms of engagement.

1. The accuracy of quantitative data and the reasonability of statements related to the GRI 2: General Disclosures (2021), as required for the “Reporting in accordance with the GRI Standards” option
2. The accuracy of quantitative data and the reasonability of statements that correspond to the following nine (9) material topics identified by OTE Group, for OTE and COSMOTE, through the materiality analysis conducted for OTE Group for FY2022, against the requirements of the respective GRI Topic Disclosures and the disclosures, indicated by the GRI Disclosure 3-3 “Management of material topics 2021”, as presented in the section titled “Global Reporting

Initiative Content Index” in the Appendix of the IR 2022:

- Ethical Business Practices (GRI 3-3 (2021), GRI 205-1 (2016), GRI 205-3 (2016), GRI 206-1 (2016))
 - Fair Employment and Employee Management (GRI 3-3 (2021), GRI 401-1 (2016) and GRI 405-1 (2016))
 - Employee Health, Safety and Wellness (GRI 3-3 (2021), GRI 403-1 (2018) – GRI 403-7 (2018) and GRI 403-9 (2018))
 - Data Security and Privacy (GRI 3-3 (2021) and GRI 418-1 (2016))
 - Customer Communication and Satisfaction (GRI 3-3 (2021) and Results of surveys measuring customer satisfaction)
 - Risk Management and Business Continuity (GRI 3-3 (2021))
 - Electromagnetic Field (EMF) Safety and Management (GRI 3-3 (2021), GRI 416-1 (2016) and 416-2 (2016))
 - Energy, Emissions and Climate Change (GRI 3-3 (2021), GRI 302-1 (2016), GRI 302-3 (2016), GRI 305-1 (2016), GRI 305-2 (2016), GRI 305-4 (2016))
 - Safe and Responsible Products and Services (GRI 3-3 (2021), 417-2 (2016))
3. The accuracy of quantitative data and the reasonability of statements that correspond to the following four (4)

additional GRI Topic Disclosures, for OTE and COSMOTE, against the requirements of the respective GRI Topic Disclosures, as indicated in the section titled “Global Reporting Initiative Content Index” in the Appendix of the IR 2022: GRI 306-2 (2020), 306-3 (2020), 306-4 (2020), 306-5 (2020)

4. The adherence of the IR 2022 with the GRI 1: Foundation 2021 (Section 4: Reporting Principles) relating to the GRI Disclosures under the scope of our work, as indicated in (1) to (3) above.

5. The provision of limited assurance on the accuracy of the consolidation method used to report OTE Group quantitative data for all the above mentioned GRI Topic Disclosures, where applicable.

6. The provision of Type 2 Moderate Assurance, in accordance with AA1000 Assurance Standard v3, on the adherence of the IR 2022 to AA1000 Account Ability Principles (2018), as described in the section titled “Accountability Principles Standard AA1000 Index” in the Appendix of the IR 2022.

7. The accuracy of the ATHEX ESG metrics, regarding environmental, social and governance issues, as disclosed in the section titled “ATHEX Guide Index” in the

Appendix of the IR 2022, against the requirement of the Athens Stock Exchange ESG Reporting Guide 2022.

8. The alignment of OTE sustainability strategy with the United Nations’ Sustainability Development Goals (SDGs)

9. The Adherence of the IR 2022 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 2022.

10. The accuracy of the quantitative data for OTE, COSMOTE, GERMANOS S.A. (“GERMANOS”), OTE INTERNATIONAL SOLUTIONS S.A. (“OTE GLOBE”), 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 (%)
- Fatal work accidents (number of employees)
- Non-fatal work accidents (number of employees)
- Court convictions for corruption against the company or its employees in relation to their professional activities (number of convictions)
- Social contribution (€)
- Electricity consumption (GWh)
- Direct and indirect CO2 emissions from energy (t)
- Recycling of mobile 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 described in (10) are included within the IR 2022. Certain non-financial indicators form part of the relevant GRI General or Topic Disclosures. For certain non-financial indicators, which are not covered by a relevant GRI General or Topic 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 2022 (“Annual Report 2022”).

Our work was related to assurance on data and information for the period 1 January 2022 – 31 December 2022 and we do not provide assurance over any prior reporting period data or information presented in the IR 2022.

Inherent limitations of the IR 2022

- Any internal control structure, no matter how effective, cannot eliminate the possibility that fraud, errors or irregularities may occur and remain undetected and because we use selective testing in our engagement, we cannot guarantee that errors or irregularities, if present, will be detected.
- We did not evaluate the design of particular internal control activities, nor obtained evidence about their implementation or tested their operating effectiveness.
- Our assurance services were limited to the English version of the IR 2022. In the event of any inconsistency between the English and Greek versions, as far as our conclusions are concerned, the English version of the IR 2022 prevails.

APPENDIX | INDEPENDENT ASSURANCE REPORT

- Where, under the scope of our engagement, financial information was used from the Annual Report 2022 and other published information of OTE Group entities included in IR 2022, our work was limited to check the accuracy of the transfer of the relevant information to the IR 2022.
- Our assurance procedures did not include testing the Information Technology systems from which data was extracted and aggregated by OTE Group for the IR 2022.
- 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 2022.
- We do not provide any assurance relating to future performance, such as estimates, expectations or targets, or their achievability.

Management responsibilities

OTE Group’s Management is responsible for the collection of the information contained within the IR 2022 and the preparation of the IR 2022 in accordance with the following principles, guidelines and directives, related to the scope of our work:

- The GRI Sustainability Reporting Standards 2021 (“GRI Standards 2021”)
- The AA1000 Account Ability Principles (2018) of Inclusivity, Materiality, Responsiveness and Impact
- The United Nation’s Global Compact Principles
- The Athens Stock Exchange (ATHEX) ESG Reporting Guide 2022

Also, OTE Group’s Management is responsible for being satisfied that the IR 2022, taken as a whole, is fair, balanced and understandable.

The Management of OTE Group is also responsible for:

- Designing, implementing, and maintaining internal processes and controls over information relevant to the preparation of the IR 2022 to ensure that they are free from material misstatement, including whether due to fraud or error.
- Providing sufficient access and making available all necessary records, correspondence, information and explanations to allow the successful completion of our work.
- Confirming to Deloitte through written representations that you have provided Deloitte with all information relevant to our work of which OTE is aware.

Deloitte’s responsibilities

Deloitte is responsible for:

- Planning and performing procedures to obtain sufficient appropriate evidence in order to express an independent limited assurance conclusion on specific scope of the IR 2022.
- Communicating matters that may be relevant to the IR 2022 to the Management of OTE including identified or suspected non-compliance with laws and regulations, fraud or suspected fraud, and bias in the preparation of the IR 2022.
- Reporting our conclusion in the form of an independent limited Assurance Report to the Company’s Management.

Our independence and competence

In conducting our engagement, we complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) related to assurance engagements issued by the International Ethics Standards Board. This code is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior. The fundamental principles of ethics establish the standard of

behavior expected of a professional accountant. Deloitte applies International Standard on Quality Management (“ISQM”) 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.

Key procedures

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the description of activities undertaken in respect of the IR 2022 is likely to arise. The procedures we performed were based on our professional judgment. In carrying out our limited assurance engagement on the description of activities undertaken in respect of the IR 2022, we performed the following procedures:

- Through inquiries of employees from various organizational levels and management of OTE Group, obtained an understanding of the Company, its environment, processes, internal controls and information systems relevant to the preparation of the IR 2022 sufficient to identify and assess risks of material misstatement in the IR 2022, and provide

- a basis for designing and performing procedures to respond to assessed risks and to obtain limited assurance to support a conclusion;
 - Reviewed the processes of OTE Group for identifying and determining material topics to be included in the IR 2022 and the coverage of these material topics within the IR 2022. Also, we performed a media review for topics relevant to OTE and COSMOTE regarding corporate responsibility and sustainable development issues and we compared the results from the media review with the material topics identified by OTE Group;
 - Performed interviews with employees from various organizational levels of OTE Group with regards to stakeholder inclusivity and, materiality, responsiveness and impact;
 - Assessed adherence to the AA1000 Account Ability Principles (2018) and reviewed the reliability and quality of information disclosed, based on relevant supporting documentation and inquiries performed for OTE Group, in accordance with AA1000 Assurance Standard v3 (Type 2 Moderate Assurance);
 - Performed analytical review procedures on the quantitative data, under the scope of our work, and made pertinent inquiries to responsible personnel;
 - 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 Topic Disclosures, under the scope of our work;
 - Inspected selected documents on a sample basis to verify the accuracy and the reasonability of statements of the disclosures included within the IR 2022, under the scope of our work;
 - Inspected, on a sample basis, the relevant formulae used in manual calculations of quantitative data under the scope of our work and assessed through recalculations whether the data has been appropriately consolidated;
 - Reviewed the reasonability over the management’s assumptions and the accuracy of estimates used in the calculations of specific Topic Disclosures;
 - Reviewed the IR 2022 for the appropriate presentation of the GRI General and Topic Disclosures 2021, under the scope of our work, including discussions with the relevant personnel about limitations and assumptions relating to the way these data are presented;
 - Reviewed the accuracy 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 2022, through inquiries, recalculations and/or inspection of supporting documents, on a sample basis;
 - Reviewed the adherence of the IR 2022 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 2022;
 - Reviewed the alignment between the United Nations’ (UN) Sustainability Development Goals and OTE Group’s sustainability strategy;
- The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.
- 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 proceeded with a Double Materiality Assessment to assess both its impact on the defined Environmental, Social and Governance (“ESG”) issues and the impact of the defined issues on the Groups’ operations and sustainability performance. The Double Materiality assessment process was carried out in accordance with the Group’s unified Enterprise Risk Management methodology, it follows international trends and best practices and it takes into consideration the European Sustainability Reporting Standards.

Responsiveness: OTE Group has established a process for responding to the topics raised by its stakeholders. The Group’s responses were found to be related to the stakeholders’ concerns and issues and were conducted in a timely, fair and appropriate manner.

Impact: OTE Group has 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 IR 2022, both qualitatively and quantitatively, in alignment with the Group’s strategy. It is recommended that OTE Group continues 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.

Use of our report

This report is made solely to OTE’s Management in accordance with ISAE 3000 and our agreed terms of engagement. Our work has been undertaken so that we might state to the Management of OTE those matters we have agreed to state to them in this report and for no other purpose.

To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company’s Management, for our work, for this report, or for the conclusions we have formed.

Athens, 23 May 2023

The Certified Public Accountant

Dimitris Katsibokis

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