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2020 GOALS

2020 PERFORMANCE

OTE Group

OTE Group: Further integrate sustainability principles in OTE Group's strategy and business activities

F See [Sustainable Business Model](#)

OTE Group: Assess climate change impact on OTE Group in line with the TCFD recommendations

IP OTE Group strives to incorporate TCFD recommendations and provide comprehensive and transparent climate-related information. For more information see Task Force on Climate Related Financial Disclosures (TCFD) Index.

OTE Group: Assess OTE Group's performance against the requirements of the Dow Jones Sustainability Index (DJSI)

F OTE actively participated in the 2020 Corporate Sustainability Assessment, issued by S&P Global, in the framework of the Group's continuous effort of improvement in sustainability / ESG issues and transparency in these matters.

OTE Group: Revise and conduct materiality analysis by engaging with external stakeholders and senior management

F See [Stakeholder Dialogue](#)

OTE-COSMOTE: Achieve e-Bill penetration to 70% of customer base

F See [Sustainable Business Model](#)

OTE-COSMOTE: Achieve mobile app penetration of 78% of the smartphone customers

F See [Sustainable Business Model](#)

OTE-COSMOTE: Achieve 35% penetration of e-top up services

F See [Sustainable Business Model](#)

Responsible Business

OTE Group: Further deploy Risk Appetite and Key Risk Indicators (KRIs) / establishment of tolerance levels.

IP The establishment of KRIs and their tolerance levels is an ongoing process, in collaboration with each risk's owner(s).

OTE-COSMOTE: Align the risk assessment methodology, which is conducted by the Business Units, with the unified risk assessment methodology, Collection of the assessments' results and incorporation of them into the OTE Group Corporate Risk Register.

IP The collection of risk assessments is ongoing and takes place on ad-hoc basis, depending on the Business Unit's needs. OTE Group ERM advises on the methodology and incorporates the results to the Corporate Risk Register. 2020 risk assessments will be completed in Q4 of 2021.

OTE Group: Establish new e-learning topics for mandatory modules (e.g. "Ethical leadership", "Antitrust").

F See [Compliance Management](#)

OTE Group Companies in Greece: Launch Human Rights' e-learning program, focusing on enhancing involvement and understanding of Human Rights issues.

F See [Human Rights Management](#)

OTE-COSMOTE: Conduct readiness assessment for ISO 27701:2019 Certification (Extension to ISO 27001 for privacy information management)

F See [Security and Data Privacy](#)

OTE-COSMOTE: Carry out compliance monitoring on data protection activities internally and in third parties

F See [Security and Data Privacy](#)

OTE-COSMOTE: Publish data protection guidelines

F See [Security and Data Privacy](#)



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2020 GOALS				2020 PERFORMANCE
Employees				
OTE Group: Become a digital company where people have impact and grow			F	See Human Resources Management See Employee Training and Skills Development
OTE Group: Create a growth mindset culture that embraces lifelong learning			F	See Employee Training and Skills Development
OTE Group: Enhance the capabilities of our employees through upskilling and re-skilling and build on the right attitude			F	See Employee Training and Skills Development
OTE Group: Design the future of work: organizational redesign and agile business set up (agile teams, mobile work)			F	See Human Resources Management
Customers				
OTE-COSMOTE: Offer the capability to sell our services remotely through our digital channels, without physical human interaction			F	In 2020, targeted projects were implemented that prepared OTE-COSMOTE to achieve fully automated sales through digital channels (such as mobile applications and their website) without physical interaction. At the same time, applications were developed (Digital on Boarding) which helped selling products and services remotely, as well assisting in customer identification process by eliminating the use of paper.
OTE-COSMOTE: Minimize the time to activate services (Voice, Internet and TV) for our customers			F	In 2020, with the upgrade of the customer support tools, a 30% and 13% reduction of the sales time for new connections and the fixed services upgrades was respectively achieved. In addition, the total average activation time for fixed and internet services was reduced by 35% for new connections and by 13% for fixed service upgrades.
OTE-COSMOTE: "Liberate internet" by increasing significantly mobile data in all tariffs, upgrading home connectivity and expanding the Fiber Optic network to provide high speeds to even more customers			F	See Connectivity for All

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



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2020 GOALS		2020 PERFORMANCE
Society		
<p>OTE-COSMOTE: > 1,600 elderly people to participate in face to face training programme to obtain primary digital skills</p> <p>OTE-COSMOTE: >1,600 students will develop Engineering skills in Greek Junior High Schools</p> <p>OTE-COSMOTE: > 3,000 technological solutions created by students (16-18 years old) based on community needs within the context of Panhellenic Robotics Competitions and STEM initiatives</p> <p>>16,000 people (students, teachers, trainers) will benefit from Educational Robotics Competitions, STEM initiatives and webinars within the 2019-2021.</p> <p>OTE-COSMOTE: Enhance the participation of professionals and entrepreneurs in programs for the development of their small – medium enterprises and entrepreneurial skills</p>	<p>N</p> <p>IP</p> <p>IP</p> <p>F</p>	<p>Due to the COVID-19 outbreak, OTE and COSMOTE suspended the face-to-face training program in order to safeguard the participants' health and prevent the spread of the COVID-19 virus among participants and program coordinators.</p> <p>See Digital Skills for All</p> <p>The program is currently in progress and will be completed in 2021.</p> <p>See Digital Skills for All</p>
Climate & Environment		
<p>OTE Group: OTE Group member of the DT Group, plans and implements measures for energy conservation and CO₂ emissions reduction to contribute toward achieving the CO2 emissions reduction target set for 2020 at DT Group level (20% reduction compared to 2008) and is committed to achieving the revised Science Based DT Group-wide targets for the post-2020 period.</p> <ul style="list-style-type: none"> • 100% coverage of its electricity consumption with electricity generated from renewable energy sources by 2021 • 90% reduction of scope 1 and scope 2 GHG emissions by 2030, compared with 2017 (base year) • 25% reduction of the most important scope 3 emissions (purchased goods and services, capital goods, and sold and leased products) per customer by 2030, compared with 2017 (base year) <p>OTE Group: Zero waste to landfill deriving from ICT services</p> <p>OTE-COSMOTE: Minimization of single use plastic items (Greece)</p> <ul style="list-style-type: none"> • Zero use of plastic bottles in buildings with restaurants and canteens • Zero use of plastic cutleries and plastic food packaging • Reduction of glass bottles use <p>COSMOTE: Installation of 2 additional EMF measurement stations</p>	<p>F</p> <p>F</p> <p>IP</p> <p>IP</p> <p>F</p> <p>F</p> <p>N</p>	<p>See Energy and Climate Change</p> <p>The RES target has been fully achieved in Greece. See Energy and Climate Change</p> <p>See Energy and Climate Change</p> <p>See Energy and Climate Change</p> <p>See Circular Economy</p> <p>See Circular Economy</p> <p>See Electromagnetic Fields</p>

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



PRINCIPLE APPLIED	METHODS	REPORT LOCATION
Inclusivity	Identification of key stakeholders and dialogue to understand key issues	Sustainable Business Model / Stakeholder Dialogue / Additional Information for GRI Indicators / Corporate Governance Structure and Members / Sustainability Governance / Risks and Uncertainties for the Next Year / 2020 Performance
Materiality	Identification of issues which are important to the company and its stakeholders	Sustainable Business Model / Stakeholder Dialogue / Additional Information for GRI Indicators / Corporate Governance Structure and Members / Sustainability Governance / Risks and Uncertainties for the Next Year / 2020 Performance
Responsiveness	Responsiveness to key issues and transparency on performance	Sustainable Business Model / Stakeholder Dialogue / Additional Information for GRI Indicators / Sustainability Governance / About this Report / Appendix
Impact	Analysis of direct and indirect impact of the company's actions.	Sustainable Business Model / Key Achievements and Targets / Stakeholder Dialogue / Sustainability Governance / Global Reporting Initiative Content Index / Additional Information for GRI Indicators / 2020 Performance / About this Report / Appendix



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

Michael Tsamaz
CHAIRMAN AND CEO OF OTE GROUP

Since 2008, OTE Group companies support the UN Global Compact, the largest voluntary corporate citizenship initiative in the world, and abide by its ten universal values in the areas of human rights, labor standards, the environment and anti-corruption. The annual Communication on Progress presents the key sections of the 2020 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 <ul style="list-style-type: none"> 1 The COP describes mainstreaming into corporate functions and business units 2 The COP describes value chain implementation 	Sustainable Business Model / Sustainability Governance Responsible Purchasing and Supply Chain Management
Robust Human Rights Management Policies & Procedures <ul style="list-style-type: none"> 3 The COP describes robust commitments, strategies or policies in the area of human rights 4 The COP describes effective management systems to integrate the human rights principles 5 The COP describes effective monitoring and evaluation mechanisms of human rights integration 	Human Rights Management Human Rights Management Human Rights Management
Robust Labour Management Policies & Procedures <ul style="list-style-type: none"> 6 The COP describes robust commitments, strategies or policies in the area of labour 7 The COP describes effective management systems to integrate the labour principles 8 The COP describes effective monitoring and evaluation mechanisms of labour principles integration 	Human Resources Management / Fair Employment Policy Framework and Equal Opportunities Human Resources Management / Fair Employment Policy Framework and Equal Opportunities Human Resources Management / Fair Employment Policy Framework and Equal Opportunities



CRITERIA	REPORT LOCATION
Robust Environmental Management Policies & Procedures	
9 The COP describes robust commitments, strategies or policies in the area of environmental stewardship	Climate and Environment
10 The COP describes effective management systems to integrate the environmental principles	Climate and Environment
11 The COP describes effective monitoring and evaluation mechanisms for environmental stewardship	Climate and Environment
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	Social Contribution
17 The COP describes advocacy and public policy engagement	Compliance Management / Connectivity for All
18 The COP describes partnerships and collective action	Awards and Memberships / Additional Information for GRI Indicators
Corporate Sustainability Governance and Leadership	
19 The COP describes CEO commitment and leadership	Corporate Governance Structure and Members / About this Report, Message from the Chairman and CEO / Sustainability Governance
20 The COP describes Board adoption and oversight	Corporate Governance Structure and Members / Sustainability Governance
21 The COP describes stakeholder engagement	Stakeholder Dialogue / Additional Information for GRI Indicators



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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 second year, OTE Group reports its ESG disclosures and practices in line with the Guide's recommendations. Detailed information can be found in the table below.

	ESG METRIC ID	METRIC TITLE	SECTION / COMMENTS
ATHEX ESG Metrics			
Environmental			
Core Metrics	C-E1	Scope 1 emissions	Energy and Climate Change / Environmental Performance Data - Energy
	C-E2	Scope 2 emissions	Energy and Climate Change / Environmental Performance Data - Energy
	C-E3	Energy consumption within the organisation	Energy and Climate Change / Environmental Performance Data - Energy
Advanced Metrics	A-E1	Scope 3 emissions	Energy and Climate Change
	A-E2	Climate change risks and opportunities	Risk and Uncertainties for the Next Year / Environmental Strategy 2020 Annual Financial Report / Task Force on Climate Related Financial Disclosures (TCFD) Index / Information on climate change risks and opportunities identified, can be found in the latest response of OTE to CDP (Section C2).
Sector-specific	SS-E8	Critical materials	Global Reporting Initiative Content Index (GRI 301)
Social			
Core Metrics	C-S1	Female employees	Employment / Human Resources Performance Data
	C-S2	Female employees in management positions	Fair Employment Policy Framework and Equal Opportunities / Human Resources Performance Data
	C-S3	Turnover rates	Employment / Human Resources Performance Data
	C-S4	Employee training	Employee Training and Skills Development / Human Resources Performance Data
	C-S5	Human rights policy	Human Rights Management
	C-S6	Collective bargaining agreements	Fair Employment Policy Framework and Equal Opportunities
	C-S7	Supplier assessment	Responsible Purchasing and Supply Chain Management
Advanced Metrics	A-S1	Stakeholder engagement	Stakeholder Dialogue
	A-S2	Employee training expenditure	Employee Training and Skills Development / Human Resources Performance Data
	A-S3	Gender pay gap	Fair Employment Policy Framework and Equal Opportunities
Sector-specific	SS-S2	Customer privacy	Security and Data Privacy
	SS-S3	Legal requests of user data	Security and Data Privacy
	SS-S5	Data security and privacy fines	Security and Data Privacy



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

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 2020 Sustainability Report

CRITERIA	REPORT LOCATION
<p>Strategy</p> <ul style="list-style-type: none"> 1. Strategic analysis and action 2. Materiality 3. Objectives 4. Value chain management 	<p>Sustainable Business Model</p> <p>Stakeholder Dialogue</p> <p>Key Achievements and Targets / 2020 Performance</p> <p>Responsible Purchasing and Supply Chain Management</p>
<p>Process Management</p> <ul style="list-style-type: none"> 5. Responsibility 6. Rules and procedures 7. Monitoring 8. Rewarding schemes and motives for sustainable development 9. Stakeholders engagement 10. Responsible products and innovation 	<p>Corporate Governance Structure and Members</p> <p>Enterprise Risk Management / Compliance Management / Integrated Management System</p> <p>Sustainable Business Model / Key Achievements and Targets / Corporate Governance Structure and Members</p> <p>Integrated Management System / Independent Assurance Report</p> <p>Corporate Governance Structure and Members / Board of Directors</p> <p>Employee Selection, Attracting and Retaining Talented Employees</p> <p>Stakeholder Dialogue / Additional Information for GRI Indicators / Stakeholders</p> <p>Products and Service for Sustainability / Energy and Climate Change</p>
<p>Environment</p> <ul style="list-style-type: none"> 11. Use of natural resources 12. Management of resources 13. Climate relevant emissions 	<p>Energy and Climate Change / Circular Economy</p> <p>Energy and Climate Change / Circular Economy / Environmental Performance Data - Waste</p> <p>Energy and Climate Change / Other Environmental Aspects / Environmental Performance Data - Energy</p>

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CRITERIA	REPORT LOCATION
Society	
14. Employment rights	Human Rights Management / Fair Employment Policy Framework and Equal Opportunities / Human Resources Performance Data OTE Group Code of Human Rights and Social Principles / OTE Group Policy on Employee Relations
15. Equal opportunities	Human Rights Management / Fair Employment Policy Framework and Equal Opportunities / Health and Safety OTE Group Code of Human Rights and Social Principles
16. Qualifications	Human Resources Management / Employment / Employee Selection, Attracting and Retaining Talented Employees 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 / Social Contribution
19. Initiatives and political influence	Awards and Memberships / Compliance Management
20. Corruption prevention and fighting	Compliance Management

Global Reporting Initiative Content Index



The OTE Group 2020 Integrated Report is “in accordance” with the GRI Standards at “core” level.

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

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GRI STANDARDS	DISCLOSURE	SECTION
	102-12 External initiatives	Awards and Memberships Additional Information for GRI Indicators / Memberships Compliance Management / Stakeholder Dialogue
	102-13 Membership of associations	Awards and Memberships Additional Information for GRI Indicators / Memberships
	Strategy	
	102-14 Statement from senior decision-maker	Message from the Chairman and CEO
	Ethics and integrity	
	102-16 Values, principles, standards, and norms of behaviour	Sustainable Business Model Compliance Management Integrated Management System Additional Information for GRI Indicators / Integrated Management System
	Governance	
	102-18 Governance structure	Corporate Governance Structure and Members
	Stakeholder engagement	
	102-40 List of stakeholder groups	Stakeholder Dialogue Additional Information for GRI Indicators / Stakeholders
	102-41 Percentage of employees covered by collective bargaining agreements	Fair Employment Policy Framework and Equal Opportunities
	102-42 Identifying and selecting stakeholders	Stakeholder Dialogue Additional Information for GRI Indicators / Stakeholders
	102-43 Approach to stakeholder engagement	Report Profile Sustainable Business Model Stakeholder Dialogue Customer Service and Satisfaction Employee Communication, Engagement and Satisfaction Additional Information for GRI Indicators / Stakeholders
	102-44 Key topics and concerns raised by stakeholders	Additional Information for GRI Indicators / Stakeholders



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GRI STANDARDS	DISCLOSURE	SECTION
	<p>Reporting practice</p> <p>102-45 Entities included in the consolidated financial statements</p> <p>102-46 Process for defining report content</p> <p>102-47 Material topics</p> <p>102-48 Re-statements of information</p> <p>102-49 Significant changes in reporting</p> <p>102-50 Reporting period</p> <p>102-51 Date of most recent report</p> <p>102-52 Reporting cycle</p> <p>102-53 Contact point</p> <p>102-54 Claims of reporting in accordance with the GRI Standards</p> <p>102-55 GRI content index</p> <p>102-56 External assurance policy</p>	<p>Report Profile</p> <p>Group Presentation</p> <p>Report Profile</p> <p>Stakeholder Dialogue</p> <p>Stakeholder Dialogue</p> <p>Additional Information for GRI Indicators / Materiality Analysis</p> <p>Report Profile</p> <p>Report Profile</p> <p>Report Profile</p> <p>The most recent published report covers the period from January 1 to December 31, 2019.</p> <p>Annual Report</p> <p>Report Profile</p> <p>Report Profile</p> <p>Global Reporting Initiative Content Index</p> <p>Independent Assurance Report</p>
Topic-Specific Standards		
Material Issue: Economic Performance		
<p>GRI 103 Management Approach 2016</p>	<p>103-1 Explanation of the material topic and its Boundary</p> <p>103-2 The management approach and its components</p> <p>103-3 Evaluation of the management approach</p>	<p>Sustainable Business Model</p> <p>Key Achievements and Targets</p> <p>Additional Information for GRI Indicators / Materiality Analysis</p>
<p>GRI 201 Economic Performance 2016</p>	<p>201-1 Direct economic value generated and distributed</p> <p>201-2 Financial implications and other risks and opportunities due to climate change</p> <p>201-4 Financial assistance received from government</p>	<p>Key Achievements and Targets</p> <p>Products and Service for Sustainability</p> <p>Energy and Climate Change</p> <p>OTE Group companies do not receive any government financial subsidies (except from co-funding contributions from the Greek State and the European Commission for developmental or competitive projects), special tax relief or other government financial support.</p>



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

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GRI STANDARDS	DISCLOSURE	SECTION
Material Issue: Corporate compliance policies		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	Compliance Management Additional Information for GRI Indicators / Materiality Analysis
GRI 205 Anti-corruption 2016	205-1 Operations assessed for risks related to corruption 205-2 Communication and training about anti-corruption policies and procedures 205-3 Confirmed incidents of corruption and actions taken	Compliance Management Compliance Management Compliance Management
GRI 419 Socioeconomic Compliance 2016	419-1 Non-compliance with laws and regulations in the social and economic area	Compliance Management Safe, Branded Customer Products Security and Data Privacy
Anti-competitive Behavior		
GRI 206 Anti-competitive behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Compliance Management

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GRI STANDARDS	DISCLOSURE	SECTION
Materials		
GRI 301 Materials 2016	301-1 Materials used by weight or volume	<p>Circular Economy</p> <p>OTE Group companies are not actually manufacturing any products themselves but provide telecommunications services and therefore their use of materials is restricted to paper, packaging materials (for the products placed in the market).</p>
	301-2 Recycled input materials used	<p>OTE Group, as described in the OTE Group Supplier Code of Conduct, requires its suppliers to take a precautionary approach towards environmental challenges, use resources responsibly and to limit, or avoid where possible, the use of rare resources. Conflict minerals are also addressed in the OTE Group Supplier Code of Conduct.</p>
	301-3 Reclaimed products and their packaging materials	<p>Circular Economy</p> <p>Quantities collected (and forwarded for recycling) in Groups' retail network are not limited to OTE Group products, while OTE Group products are also collected in collection points established within other retail outlets, and therefore it is not possible to estimate the percentage of products sold that are actually reclaimed.</p> <p>OTE Group companies are implementing a product packaging monitoring program for their products distributed in the market, and participate in systems for the management of packaging materials waste, as foreseen by national and European legislation. Therefore, it is not possible for OTE Group companies to know the actual quantities of their packaging materials reclaimed and recycled, as it is the responsibility of these systems to do so.</p>



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GRI STANDARDS	DISCLOSURE	SECTION
Energy		
GRI 302 Energy 2016	302-1 Energy consumption within the organization	<p>Energy and Climate Change Environmental Performance Data - Energy</p>
	302-3 Energy intensity	<p>Energy and Climate Change Environmental Performance Data - Energy</p>
	302-4 Reduction of energy consumption	<p>Energy and Climate Change Environmental Performance Data - Energy</p>
	302-5 Reductions in energy requirements of products and services	<p>Energy and Climate Change Environmental Performance Data - Energy</p>
Water		
GRI 303 Water 2016	303-1 Water withdrawal by source	Circular Economy
	303-2 Water sources significantly affected by withdrawal of water	<p>Water consumed is acquired solely from public water companies which are responsible not only for water supply but also for the sustainable uptake of water from the available water resource systems. Thus, water sources are not significantly affected by OTE Group activities.</p>
	303-3 Water recycled and reused	Circular Economy



GRI STANDARDS	DISCLOSURE	SECTION
Biodiversity		
<p>GRI 304 Biodiversity 2016</p>	<p>304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas</p> <p>304-2 Significant impacts of activities, products, and services on biodiversity</p> <p>304-3 Habitats protected or restored</p> <p>304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations</p>	<p>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.

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



GRI STANDARDS	DISCLOSURE	SECTION
Environmental Compliance		
GRI 307 Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	The fines (related to the environment) imposed in 2020 amounted to € 7,941, 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.
Supplier Environmental Assessment		
GRI 308 Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria 308-2 Negative environmental impacts in the supply chain and actions taken	Responsible Purchasing and Supply Chain Management Responsible Purchasing and Supply Chain Management
Employment		
GRI 401 Employment 2016	401-1 New employee hires and employee turnover 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees 401-3 Parental leave	Employment / Human Resources Performance Data Employee Selection, Attracting and Retaining Talented Employees Additional Information for GRI Indicators Employee Benefits All employees, female and male, returned to their normal duties.
Labor/Management Relations		
GRI 402 Labor/Management Relations	402-1 Minimum notice periods regarding operational changes	For any significant change in their operation (e.g. reorganization, outsourcing operation, business interruption, expansions, new job positions, acquisitions, sale of all or part of the company, or mergers), OTE Group companies inform or consult the most representative trade unions as appropriate, applying each time the current legislative framework.

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GRI STANDARDS	DISCLOSURE	SECTION
Material Issue: Occupational Health and Safety		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Health and Safety
	103-2 The management approach and its components	Health and Safety
	103-3 Evaluation of the management approach	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
GRI 403 Occupational Health and Safety 2018 Topic-specific disclosures	403-9 Work-related injuries	Health and Safety / Health and Safety in the workplace Additional Information for GRI Indicators / Health and Safety Performance Human Resources Performance Data The main types of work-related injuries included employee slips and falls (mainly outside of the corporate premises), contact with objects and equipment, and motor vehicle accidents (mostly on the way to/after work). The data for "employees who are not employees but whose work and / or workplace is controlled by the organization - first level of cooperation and / or according to the terms of the agreements" are not available for OTE Group, as the corresponding collection process data has not been created. However, OTE Group has started the creation of such kind of process, which may concern the collection of data from contractors/companies of first level of cooperation in technology field (not including subcontractors) in order to launch the reporting within the next year.

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GRI STANDARDS	DISCLOSURE	SECTION
Material Issue: Employee training and skills development		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	Employee Training and Skills Development Additional Information for GRI Indicators / Materiality Analysis
GRI 404 Training and Education 2016	404-1 Average hours of training per year per employee 404-2 Programs for upgrading employee skills and transition assistance programs 404-3 Percentage of employees receiving regular performance and career development reviews	Employee Training and Skills Development Human Resources Performance Data Employee Selection, Attracting and Retaining Talented Employees Employee Training and Skills Development Employee Selection, Attracting and Retaining Talented Employees
Diversity and Equal Opportunity		
GRI 405 Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Employment Fair Employment Policy Framework and Equal Opportunities Human Resources Performance Data OTE Group Code of Human Rights and Social Principles OTE Group Policy on Employee Relations Minority group membership is not a material issue for the operation of OTE Group in Greece
Equal Remuneration for Women and Men		
GRI 405 Diversity and Equal Opportunity 2016	405-2 Ratio of basic salary and remuneration of women to men	Fair Employment Policy Framework and Equal Opportunities



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

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GRI STANDARDS	DISCLOSURE	SECTION
Investment		
GRI 412 Human Rights Assessments 2016	412-1 Operations that have been subject to human rights reviews or impact assessments 412-2 Employee training on human rights policies or procedures 412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Human Rights Management Human Rights Management Human Rights Management
Local Communities		
GRI 413 Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs 413-2 Operations with significant actual and potential negative impacts on local communities	Social Contribution Social Contribution Electromagnetic Fields Other Environmental Aspects Environmental protection expenditures for 2020 amounted to € 1.58 million and cover waste treatment, management and disposal, environmental impact assessment studies, external certification of environmental management systems and measurements on electromagnetic fields.
Supplier Social Assessment		
GRI 414 Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria 414-2 Negative social impacts in the supply chain and actions taken	Responsible Purchasing and Supply Chain Management Responsible Purchasing and Supply Chain Management

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GRI STANDARDS	DISCLOSURE	SECTION
Public Policy		
GRI 415 Public Policy	415-1 Political contributions	According to the OTE Group Code of Conduct, and the relevant policies, OTE Group companies neither donate money to political parties and elected officials, nor do they grant them any monetary value-added benefits. In addition, the use of OTE Group resources and assets for political reasons is not allowed.
Customer Health and Safety		
GRI 416 Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Communication with Customers Electromagnetic Fields Communication with Customers Electromagnetic Fields
Marketing Communications		
GRI 417 Marketing and Labelling 2016	417-1 Requirements for product and service information and labelling 417-2 Incidents of non-compliance concerning product and service information and labelling 417-3 Incidents of non-compliance concerning marketing communications	Communication with Customers Communication with Customers Communication with Customers

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GRI STANDARDS	DISCLOSURE	SECTION
Material Issue: Data Security and Privacy		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	Security and Data Privacy Additional Information for GRI Indicators / Materiality Analysis
GRI 418 Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Security and Data Privacy
Material Issue: Customer Service and Satisfaction		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach Results of surveys measuring customer satisfaction	Customer Service and Satisfaction Additional Information for GRI Indicators / Materiality Analysis Customer Service and Satisfaction
Material Issue: Business Continuity		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its Boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	Business Continuity Additional Information for GRI Indicators / Materiality Analysis
Material Issue: Electromagnetic Fields (EMF)		
Material Issue: Electromagnetic Fields (EMF)	103-1 Explanation of the material topic and its Boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	Electromagnetic Fields Additional Information for GRI Indicators / Materiality Analysis

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Additional Information for GRI Indicators

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

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 Globe	Member since 2014.
The Sustainable Greece 2020 Initiative	OTE Group	Participation as "Ambassadors of Sustainability", since 2014. The Sustainable Greece 2020 initiative aims to create a structured dialogue and develop methodologies and tools that will support Greece's course towards sustainable development at both micro- and macro-economic level.
Corporate Responsibility Institute, Greece	OTE	Member since 2008.
Global Sustain	OTE Group	Member since 2007.
Hellenic Institute of Entrepreneurship and Sustainable Development	OTE Group	Member since 2013.
Greek Diversity Charter	OTE Group	Founding member, since 2019.
Transparency International Greece	OTE Group	Member of Business Integrity Forum of Transparency International, since 2017.
Road Safety Institute "Panos Mylonas" and Roads to the Future"	COSMOTE	Member and sponsor since 2009.
Alliance for safety and courtesy on the road		
Code of Conduct for value-add-ed services provided through mobile phones and for the protection of juvenile users	COSMOTE	Participant since 2006. In 2008, the Code was adjusted to European Standards.
Association of Mobile Telephony Companies (EEKT)	COSMOTE	Founding member since 2008.
Federation of Hellenic Information Technology and Communications, Enterprises (SEPE)	OTE	Member since 1998.
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 / COSMOTE / Telekom Romania Mobile Communications	Participation since 2013, as member of Deutsche Telekom Group.
European Memorandum for Safer Mobile Use by children and younger teenagers	COSMOTE	Participant since 2007.



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ORGANIZATION / INITIATIVE	COMPANY	PARTICIPATION TYPE
International		
UN Global Compact (UNGC)	<p>OTE</p> <p>Telekom Romania Mobile Communications</p>	<p>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.</p> <p>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.</p>
GSM Association (GSMA)	<p>COSMOTE</p> <p>Telekom Romania Mobile Communications</p>	<p>Member of the World Association of Mobile Communications Services since 1997. COSMOTE actively participates in many of its workgroups.</p> <p>Member.</p>
Association of Certified Fraud Examiners (ACFE)	OTE	Member, since 2020, of Corporate Alliance Program.



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

MOST IMPORTANT ISSUES FOR MANAGEMENT & STAKEHOLDERS	DEMARCATIION (INSIDE / OUTSIDE COMPANIES)
3 Ethical Business Practices	The issue is primarily internal, has an impact on the operation of the companies and their employees.
5 Fair Employment and Employee Management	The issue is primarily internal, has an impact on the operation of the companies and their employees.
6 Employee Training and Skills Development	The issue is primarily internal, has an impact on the operation of the companies and their employees.
8 Business Continuity	The issue is primarily internal, has an impact on the operation of the companies, and may affect their shareholders, employees, suppliers and customers.
9 Data Security and Privacy	The issue is primarily external and has an impact on their customers.
10 Employee Health, Safety and Wellness	The issue is primarily internal, has an impact on the operation of the companies and their employees.
15 Customer service and satisfaction	The issue is internal, has an impact on the operation of the companies and their employees, and external as it directly affects their customers.
19 Electromagnetic Fields (EMF)	The issue is internal, as it has an impact on the operation of the company, and external as it directly affects customers and the general public.



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Stakeholder

	SHAREHOLDERS, BONDHOLDERS, INVESTORS & ANALYSTS	CUSTOMER & PROSPECTIVE CUSTOMERS	EMPLOYEES AND THEIR REPRESENTATIVES	BUSINESS	ORGANIZATIONS OF SCIENCE, RESEARCH AND EDUCATION	NGOs AND INTEREST GROUPS	MEDIA	STATE/ GOVERNMENT ISSUES	SUPPLIERS
ECONOMIC PERFORMANCE	●						●		
ETHICAL BUSINESS PRACTICES						●		●	●
HUMAN RIGHTS	●		●		●	●			●
FAIR EMPLOYMENT & EMPLOYEE MGT			●					●	
EMPLOYEE TRAINING & SKILLS DEVELOPMENT			●						
BUSINESS CONTINUITY									●
DATA SECURITY AND PRIVACY	●	●	●	●	●	●			●
EMPLOYEE HEALTH, SAFETY AND WELLNESS	●	●	●	●				●	●
DIGITAL SOCIETY							●	●	
PRODUCTS & SERVICES FOR SUSTAINABILITY							●		
RESPONSIBLE COMMUN. WITH CUSTOMERS		●		●			●		
CUSTOMER SERVICE AND SATISFACTION	●	●		●	●		●	●	
ENERGY AND CLIMATE CHANGE					●				
CIRCULAR ECONOMY						●			
ELECTROMAGNETIC FIELDS (EMF)		●		●	●	●			

Issue

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



Primary Stakeholders (Relevant for GRI Standards 102-40, 102-42, 102-43, 102-44)

PRIMARY STAKEHOLDERS OTE AND COSMOTE

Customers and prospective customers

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

NGOs and interest groups

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

Employees and their representatives

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

Business

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

Media

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

Suppliers

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

Organizations of science, research & education

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

State / Government entities

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

Shareholders, bondholders, investors and analysts

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



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PRIMARY STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
Science, research and education	Meetings Conference calls E-mails Dissemination activities (workshops, conferences, etc.) Conferences Surveys Sustainability Report	Frequently Ongoing Ongoing Frequently Ongoing Ongoing Annual	<ul style="list-style-type: none"> • New technology products and services • Communication safety • Technology awareness 	<p>Products and Services for Sustainability</p> <p>Safe and Responsible Use of Technology</p> <p>Social Contribution</p>
NGOs and interest groups	Meetings Sustainability surveys Conferences E-mails Working groups Consultation Sustainability Report	Bi-annually Annual Ongoing Ongoing Ongoing Ongoing Annual	<ul style="list-style-type: none"> • Importance of adopting CR • Internet Safety public education • Support for vulnerable groups and charities • Social Contribution • EMF, Biodiversity • Environmental performance 	Integrated Report (all sections)
Media	Announcements / Press releases Informational material Events / Press conferences Other media contacts Sustainability surveys Sustainability Report	Ongoing Ongoing Ongoing Ongoing Annual Annual	<ul style="list-style-type: none"> • Management • HR issues • Industry developments and market structure • Technology advances/network infrastructure • New product launches • TV market • Technology and telecommunications • Business and finance policies • Culture • CR 	Integrated Report (all sections)



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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 	<ul style="list-style-type: none"> OTE Group Compliance Management Connectivity for All Communication with Customers Social Contribution Environmental Strategy Corporate Governance Structure and Members
	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		
Employees, prospective employees and their representatives	Sustainability Report	Annual		
	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, worklife 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 	<ul style="list-style-type: none"> Sustainable Business Model Human Rights Management Security and Data Privacy Employees Employee Volunteering
	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			



PRIMARY STAKEHOLDERS	TYPE OF ENGAGEMENT (Participation, Dialogue & Information)	FREQUENCY	MAIN TOPICS RAISED	OTE GROUP'S RESPONSIVENESS
Suppliers	Consultation and dialogue on procurement policy / supplier code of conduct issues Attendance in sector-based unions Meetings Sustainability surveys Suppliers' evaluation Negotiations Presentation of new products Consultation and dialogue on technical issues Sustainability Report	Ongoing Ongoing Ongoing Annual Ongoing Ongoing Ongoing Periodic Annual	<ul style="list-style-type: none"> • Tender criteria and competitions • Communication on supplies issues • Transparency • Market Policy • Economic growth • Inserting CR criteria, including environmental criteria • Procurement best practices • Procurement trends 	OTE Group Responsible Purchasing and Supply Chain Management
Analysts and investors	Investor Relations Department communication Annual General Shareholders Meeting Annual, Corporate governance report and Sustainability Report Sustainability surveys Participation in corporate responsibility ratings Private meetings Conference Calls Meetings of executives Adoption and implementation of policies and principles Daily collaboration Conferences arranged by brokers Dedicated Website (www.otewholesale.gr) Sales Department OTE Systems presentations to telecom provider Special mail box (otewholesale@ote.gr) Press Releases Corporate announcements	Ongoing Annual Annual Annual Ongoing Ongoing Quarterly Ongoing Ongoing Ongoing Regularly Ongoing Ongoing Ongoing Ongoing Ongoing	<ul style="list-style-type: none"> • Financial performance • Short and longer term outlook • Competitive environment • Cashflow • Debt issuance and repayment • Dividends • Group strategy and results • Outlook on labor relations, regulatory decisions, economic conditions • Climate change policy 	Integrated Report (all sections)



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

MANAGEMENT SYSTEM CERTIFICATIONS	OTE GROUP				
	OTE	COSMOTE	COSMOTE e- Value	OTE Academy	Telekom Romania Mobile Communications
Integrated Management System, as per PAS99	•	•			
Quality Management System, as per ISO 9001	•	•	•	•	•
Environmental Management System, as per ISO 14001	•	•			•
Occupational Health & Safety Management System, as per ISO 45001 (OTE – COSMOTE) / OHSAS 18001 (Telekom Romania)	•	•			•
Information Security Management System, as per ISO 27001	•	•	•		•
Information Technology- Service Management, as per ISO 20000-1	•	•			•
Business Continuity Management System, as per ISO 22301	•	•			•
Energy Management System, as per ISO 50001	•	•			
Risk Management System, as per ISO 31000	•	•			•
Anti-bribery Management System, as per ISO 37001	•	•			•
Compliance Management System, as per ISO 19600	•	•			•
General Requirements for the Competence of Testing and Calibration Laboratories, as per ISO 17025		•			
Principles and Guidelines for Good Distribution Practice of Medical Devices, acc. to Decision 1348/04	•	•			
Industrial Safety Certification (EKBA) Greek Legislation "Government Gazette B 336 - 16.03.2005"	•	•			
"Assurance reports on controls at a service organization" as per ISAE 3402 Type 2 Report and "Assurance Engagements other than Audits or Reviews of Historical Financial Information" as per ISAE 3000 Type 2 Report	•	•			



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Employee Benefits (Relevant for GRI Standard 401-2)

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

MAIN BENEFITS TO OTE GROUP EMPLOYEES PER CATEGORY IN 2020

Insurance

- Health insurance program for all employees and dependents.
- Life insurance program for all employees.
- 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 for OTE and COSMOTE employees.

Other benefits

- Provision of special prices for goods and services of other companies.
- Offering, through a draw, of tickets to sporting and cultural events.
- Issuing of Food Vouchers.
- Staff bus for transportation of personnel to and from subway stations and commuter rail.
- Provision of multi-trip card or e-PASS, for employees in the Paiania building.
- Ability to use dining services in restaurants / coffee 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 work commuting.
- Medical services for employees.
- Provision of special payment has been granted to all non-Executive employees of OTE Group's companies, as a special recognition and appreciation for their performance during the time COVID-19 pandemic.

Family

- Allowance for child care and nursery costs.
- Saving program through the "Youth Account" program.
- Wedding gift.
- Financial support of employees.
- Financial rewards for graduation with high honors of employees' children from public institutions of higher education or language training.
- Financial rewards for employees' children, who excel in institutions of higher education.
- Implement special policies for working mothers and people with disabilities.
- Special support for large families.
- Financial support through "Fund for Mutual Help" for health expenses.
- Christmas gifts to employees' children.
- Privileged mobile program for employees' children who are students.
- Pregnancy and maternity leave for child care.



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MAIN BENEFITS TO OTE GROUP EMPLOYEES PER CATEGORY IN 2020

Free time - Vacation

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

Athletics – Wellness facilities

- Ability to participate in team sport activities in Athens:
 - Outdoor training in accordance with all legislation rules on COVID-19 prevention.
- Ability to participate in Wellness programs:
 - Wellness@home: A series of short videos, posted on the Group's internal intranet with tips and suggestions on nutrition, exercise and musculoskeletal health issues.
 - Wellness Reloaded: Live Training Sessions with expert personal trainers for gentle physical activity from home.
 - e-Appointment with nutritionist: Virtual personal meetings with expert nutritionists in order to adopt right eating habits.
 - Training at the Indoor Gym in Paiania premises by making personal e-booking reservation meetings and following all legislation rules about concerning covidCOVID-19 prevention.
- Provision of special price offers that can be accessed through various sport and wellness providers.

Employee support and counseling

- 24/7 anonymous and confidential helpline called NEXT TO YOU developed to empower and support OTE, COSMOTE and GERMNAOS employees and their families, in every aspect of their everyday life, while contributing to maintaining their wellness at high levels.
- Informative **live webinars**, for well-being, self-improvement and maintaining work-life balance (topics related to parental role and resilience).



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Human Resources Performance Data



Performance Indicators on Human Resources		Unit	GREECE			ROMANIA			OTE GROUP		
			2018	2019	2020	2018	2019	2020	2018	2019	2020
Total workforce (headcount on 31st of December)			12,419	12,016	11,162	1,754	1,127	999	14,173	13,143	12,161
Employment type											
Full - time dependent employment with indeterminate term contracts	Number (%)		11,781 (94.9%)	11,533(96.0%)	10,815 (96.9%)	1,528 (87%)	1,091 (97%)	977 (97.8%)	13,309 (93.9%)	12,624 (96.1%)	11,792 (97%)
Part - time dependent employment with indeterminate term contracts	Number (%)		564 (4.5%)	419 (3.5%)	308 (2.8%)	1 (0.1%)	3 (0.3%)	0 (0%)	565 (4.0%)	422 (3.2%)	308 (2.5%)
Dependent employment, on fixed-term	Number (%)		74 (0.6%)	64 (0.5%)	39 (0.3%)	225 (12.8%)	33 (2.9%)	22 (2.2%)	299 (2.1%)	97 (0.7%)	61 (0.5%)
Gender											
Male	Number (%)		7,635 (61.5%)	7,334 (61.0%)	6,894 (62%)	736 (42%)	413 (36.6%)	364 (36%)	8,371 (59%)	7,747 (58.9%)	7,258 (60%)
Female	Number (%)		4,784 (38.5%)	4,682 (39.0%)	4,268 (38%)	1,018 (58%)	714 (63.4%)	635 (64%)	5,802 (41%)	5,396 (41.1%)	4,903 (40%)
Age											
Under 30 years	Number (%)		588 (4.7%)	396 (3.3%)	434 (4%)	657 (37.5%)	312 (27.7%)	213 (21%)	1,245 (9%)	708 (5.4%)	647 (5%)
Between 31 and 50 years	Number (%)		9,456 (76.1%)	9,157 (76.2%)	8,470 (76%)	1,024 (58.4%)	766 (68%)	729 (73%)	10,480 (74%)	9,923 (75.5%)	9,199 (76%)
Over 51 years	Number (%)		2,375 (19.1%)	2,463 (20.5%)	2,258 (20%)	73 (4.2%)	49 (4.3%)	57 (6%)	2,488 (17%)	2,512 (19.1%)	2,315 (19%)
Number of employees - by employee seniority											
Total no of employees included in the top 10% of empl. by total compensation	Number			1,201	1,112		113	100		1,314	1,212
Male	Number (%)			839 (69.9%)	786 (71%)		65 (57.5%)	36 (36%)		904 (68.8%)	822 (68%)
Female	Number (%)			362 (30.1%)	326 (29%)		48 (42.5%)	64 (64%)		410 (31.2%)	390 (32%)
Total no of employees incl. in the bottom 90% of empl. by total compensation	Number			10,815	10,050		1,014	899		11,829	10,949
Male	Number (%)			6,495 (60.1%)	6,107 (61%)		348 (34.3%)	328 (36%)		6,843 (57.8%)	6,435 (59%)
Female	Number (%)			4,320 (39.9%)	3,943 (39%)		666 (65.7%)	571 (64%)		4,986 (42.2%)	4,514 (41%)
Responsibility level											
Employees with position of responsibility ¹	Number (%)		1,633 (13.1%)	1,586 (13.2%)	1,474 (13%)	114 (6%)	73 (6.5%)	69 (7%)	1,747 (12%)	1,659 (12.6%)	1,543 (13%)
Male	Number (%)		1,150 (70.4%)	1,119 (70.6%)	1,036 (70%)	70 (61.4%)	42 (57.5%)	43 (62%)	1,220 (69.8%)	1,161 (70%)	1,079 (70%)
Female	Number (%)		483 (29.6%)	467 (29.4%)	438 (30%)	44 (38.6%)	31 (42.5%)	26 (38%)	527 (30.2%)	498 (30%)	464 (30%)
Employees without position of responsibility	Number (%)		10,786 (86.9%)	10,430 (86.8%)	9,688 (87%)	1,640 (94%)	1,054 (93.5%)	930 (93%)	12,426 (88%)	11,484 (87.4%)	10,618 (87%)
Male	Number (%)		6,485 (60.1%)	6,215 (59.6%)	5,858 (60%)	666 (40.6%)	371 (35.2%)	321 (35%)	7,151 (57.5%)	6,585 (57.3%)	6,179 (58%)
Female	Number (%)		4,301 (39.9%)	4,215 (40.4%)	3,830 (40%)	974 (59.4%)	683 (64.8%)	609 (65%)	5,275 (42.5%)	4,898 (42.7%)	4,439 (42%)

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



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Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2018	2019	2020	2018	2019	2020	2018	2019	2020
Total workforce (headcount on 31st of December)		12,419	12,016	11,162	1,754	1,127	999	14,173	13,143	12,161
Type of Work										
Office	Number (%)	7,036 (56.7%)	7,053 (58.7%)	6,964 (62%)	693 (39.5%)	421 (37.4%)	357 (36%)	7,729 (54.5%)	7,474 (56.9%)	7,321 (60%)
Retail	Number (%)	1,203 (9.7%)	1,156 (9.6%)	1,042 (9%)	880 (50.2%)	605 (53.7%)	556 (56%)	2,083 (14.7%)	1,761 (13.4%)	1,598 (13%)
Fieldwork/other	Number (%)	4,180 (33.7%)	3,807 (31.7%)	3,156 (28%)	181 (10.3%)	101 (9.0%)	86 (9%)	4,361 (30.8%)	3,908 (29.7%)	3,242 (27%)
Employees with special needs										
Employees with special needs	Number (%)	305 (2%)	335 (2.8%)	300 (2.7%)	0 (0.0%)	3 (0.3%)	3 (0.3%)	305 (2%)	338 (2.6%)	303 (2.5%)
Employees covered by enterprise collective labor agreements (%)		10,115 (81.4%)	9,773 (81.3%)	9,027 (81%)	1,754 (100.0%)	1,127 (100.0%)	999 (100%)	12,156 (85.8%)	10,900 (82.9%)	10,026 (82%)
Headcount (Yearly) Average	Number	12,606	12,190	11,605	1,816	1,436	1,062	14,422	13,626	12,666
Male	Number (%)	7,766 (61.6%)	7,459 (61.2%)	7,082 (61%)	761 (41.9%)	586 (40.8%)	388 (37%)	8,527 (59%)	8,045 (59%)	7,470 (59%)
Female	Number (%)	4,840 (38.4%)	4,731 (38.8%)	4,523 (39%)	1,055 (58.1%)	851 (59.2%)	673 (63%)	5,895 (41%)	5,581 (41%)	5,196 (41%)
Total hours worked	Number			21,405,720			1,898,619.64			23,304,339.64



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Performance Indicators on Human Resources		Unit	GREECE			ROMANIA			OTE GROUP		
			2018	2019	2020	2018	2019	2020	2018	2019	2020
Total workforce on indeterminant term contracts			12,345	11,952	11,123	1,529	1,094	977	13,874	13,046	12,100
Employment type											
Full- time	Number (%)		11,781 (95.4%)	11,533 (96.5%)	10,815 (97%)	1,528 (100%)	1,091 (99.7%)	977 (100%)	13,309 (96%)	12,624 (96.8%)	11,792 (97%)
Part- time	Number (%)		564 (4.6%)	419 (3.5%)	308 (3%)	1 (0%)	3 (0.3%)	0 (0%)	565 (4%)	422 (3.2%)	308 (3%)
Gender											
Male	Number (%)		7,600 (61.6%)	7,300 (61.1%)	6,861 (62%)	647 (42.3%)	399 (36.5%)	352 (36%)	8,247 (59%)	7,699 (59%)	7,213 (60%)
Female	Number (%)		4,745 (38.4%)	4,652 (38.9%)	4,262 (38%)	882 (57.7%)	695 (63.5%)	625 (64%)	5,627 (41%)	5,347 (41%)	4,887 (40%)
Responsibility level											
Employees with position of responsibility ¹	Number (%)		1,630 (13.2%)	1,582 (13.2%)	1,473 (13%)	109 (7.1%)	71 (6.5%)	67 (7%)	1,739 (12.5%)	1,653 (12.7%)	1,540 (13%)
	Male	Number (%)	1,147 (70.4%)	1,116 (70.5%)	1,035 (70%)	66 (60.6%)	40 (56.3%)	41 (61%)	1,213 (69.8%)	1,156 (69.9%)	1,076 (70%)
	Female	Number (%)	483 (29.6%)	466 (29.5%)	438 (30%)	43 (39.4%)	31 (43.7%)	26 (39%)	526 (30.2%)	497 (30.1%)	464 (30%)
Employess without position of responsibility	Number (%)		10,715 (86.8%)	10,370 (86.8%)	9,650 (87%)	1,420 (92.9%)	1,023 (93.5%)	910 (93%)	12,135 (87.5%)	11,393 (87.3%)	10,560 (87%)
	Male	Number (%)	6,453 (60.2%)	6,184 (59.6%)	5,826 (60%)	581 (40.9%)	359 (35.1%)	311 (34%)	7,034 (58%)	6,543 (57.4%)	6,137 (58%)
	Female	Number (%)	4,262 (39.8%)	4,186 (40.4%)	3,824 (40%)	839 (59.1%)	664 (64.9%)	599 (66%)	5,101 (42%)	4,850 (42.6%)	4,423 (42%)
Type of Work											
Office	Number (%)		7,013 (56.8%)	7,033 (58.8%)	6,938 (62%)	635 (41.5%)	404 (36.9%)	342 (35%)	7,648 (55.1%)	7,437 (57%)	7,280 (60%)
Retail	Number (%)		1,198 (9.7%)	1,154 (9.7%)	1,042 (9%)	719 (47%)	590 (53.9%)	550 (56%)	1,917 (13.8%)	1,744 (13.4%)	1,592 (13%)
Fieldwork/other	Number (%)		4,134 (33.5%)	3,765 (31.5%)	3,143 (28%)	175 (11.4%)	100 (9.1%)	85 (9%)	4,309 (31.1%)	3,865 (29.6%)	3,228 (27%)
Total workforce on full- time indeterminant term contracts		Number	11,781	11,533	10,816	1,528	1,091	977	13,309	12,624	11,793
Gender											
Male	Number (%)		7,477 (63.5%)	7,224 (62.6%)	6,801 (63%)	647 (42.3%)	397 (36.4%)	352 (36%)	8,124 (61%)	7,621 (60.4%)	7,153 (61%)
Female	Number (%)		4,304 (36.5%)	4,309 (37.4%)	4,015 (37%)	881 (57.7%)	694 (63.6%)	625 (64%)	5,185 (39%)	5,003 (39.6%)	4,640 (39%)
Total workforce on part-time indeterminant term contracts		Number	564	418	308	1	3	0	565	421	308
Gender											
Male	Number (%)		123 (21.8%)	76 (18.2%)	60 (19%)	0 (0%)	2 (66.7%)	0 (0%)	123 (21.8%)	78 (18.5%)	60 (19%)
Female	Number (%)		441 (78.2%)	342 (81.8%)	248 (81%)	1 (100%)	1 (33.3%)	0 (0%)	442 (78.2%)	343 (81.5%)	248 (81%)

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



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Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2018	2019	2020	2018	2019	2020	2018	2019	2020
Recruitment		175	166	116	342	64	44	517	230	160
Gender										
Male	Number (%)	110 (62.9%)	117 (70.5%)	89 (77%)	144 (42.1%)	31 (48.4%)	24 (55%)	254 (49.1%)	148 (64.3%)	113 (71%)
Female	Number (%)	65 (37.1%)	49 (29.5%)	27 (23%)	198 (57.9%)	33 (51.6%)	20 (45%)	263 (50.9%)	82 (35.7%)	47 (29%)
Age										
Under 30 years	Number (%)	70 (40.0%)	60 (36.1%)	52 (45%)	253 (74%)	42 (65.6%)	20 (45%)	323 (62.5%)	102 (44.3%)	72 (45%)
Between 31 and 50 years	Number (%)	104 (59.4%)	95 (57.2%)	64 (55%)	87 (25.4%)	19 (29.7%)	21 (48%)	191 (36.9%)	114 (49.6%)	85 (53%)
Over 51 years	Number (%)	1 (0.6%)	11 (6.6%)	0 (0%)	2 (0.6%)	3 (4.7%)	3 (7%)	3 (0.6%)	14 (6.1%)	3 (2%)
Recruitment within OTE Group										
Recruitment within OTE Group	Number (%)	10 (5.7%)	12 (7.2%)	22 (19%)	22 (6%)	4 (6.3%)	4 (9%)	32 (6.2%)	16 (7%)	26 (16%)
Departures	Number	505	580	1,084	417	682	170	922	1,262	1,254
Gender										
Male	Number (%)	340 (67.3%)	411 (70.9%)	614 (57%)	181 (43.4%)	350 (51.3%)	73 (43%)	521 (56.5%)	761 (60.3%)	687 (55%)
Female	Number (%)	165 (32.7%)	169 (29.1%)	470 (43%)	236 (56.6%)	332 (48.7%)	97 (57%)	401 (43.5%)	501 (39.7%)	567 (45%)
Age										
Under 30 years	Number (%)	46 (9.1%)	30 (5.2%)	57 (5%)	265 (63.5%)	297 (43.5%)	47 (28%)	311 (33.7%)	327 (25.9%)	104 (8%)
Between 31 and 50 years	Number (%)	239 (47.3%)	251 (43.3%)	526 (49%)	146 (35%)	347 (50.9%)	114 (67%)	385 (41.8%)	598 (47.4%)	640 (51%)
Over 51 years	Number (%)	220 (43.6%)	301 (51.9%)	501 (46%)	6 (1.4%)	38 (5.6%)	9 (5%)	226 (24.5%)	339 (26.9%)	510 (41%)
Voluntary Exit Programs										
Departures in the context of voluntary exit programs	Number (%)	282 (55.8%)	321 (55.3%)	695 (64%)	339 (81.3%)	191 (28%)	9 (5%)	621 (67%)	512 (40.6%)	704 (56%)
Type of Departure										
Voluntary turnover	Percentage %		4.4%	9%		36.7%	15%		7.8%	9%
Involuntary turnover	Percentage		0.3%	1%		10.8%	1%		1.4%	1%



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Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2018	2019	2020	2018	2019	2020	2018	2019	2020
Total workforce on fixed-term contracts		74	64	39	225	33	22	299	97	61
Gender										
Male	Number (%)	35 (47.3%)	34 (53.1%)	32 (82%)	89 (39.6%)	14 (42.4%)	12 (55%)	124 (41.5%)	48 (49.5%)	44 (72%)
Female	Number (%)	39 (52.7%)	30 (46.9%)	7 (18%)	136 (60.4%)	19 (57.6%)	10 (45%)	175 (58.5%)	49 (50.5%)	17 (28%)
Members of the Board of Directors	Number	10	10	10				10	10	10
Gender										
Male	Number (%)	8 (80.0%)	9 (90.0%)	8 (80%)				8 (80.0%)	9 (90.0%)	8 (80%)
Female	Number (%)	2 (20.0%)	1 (10.0%)	2 (20%)				2 (20.0%)	1 (10.0%)	2 (20%)
Age										
Under 30 years	Number (%)	0	0	0 (0%)				0	0	0 (0%)
Between 31 and 50 years	Number (%)	5 (50.0%)	4 (40.0%)	3 (30%)				5 (50.0%)	4 (40.0%)	3 (30%)
Over 51 years	Number (%)	5 (50.0%)	6 (60.0%)	7 (70%)				5 (50.0%)	6 (60.0%)	7 (70%)
Members of OTE Group Management Team	Number	15	15	14				15	15	14
Gender										
Male	Number (%)	12 (80.0%)	12 (80.0%)	11 (79%)				12 (80.0%)	12 (80.0%)	11 (79%)
Female	Number (%)	3 (20.0%)	3 (20.0%)	3 (21%)				3 (20.0%)	3 (20.0%)	3 (21%)
Age										
Under 30 years	Number (%)	0	0	0 (0%)				0	0	0 (0%)
Between 31 and 50 years	Number (%)	7 (46.7%)	4 (26.7%)	3 (21%)				7 (46.7%)	4 (26.7%)	3 (21%)
Over 51 years	Number (%)	8 (53.3%)	11 (73.3%)	11 (79%)				8 (53.3%)	11 (73.3%)	11 (79%)



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Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2018	2019	2020	2018	2019	2020	2018	2019	2020
Health and Safety Issues										
Fatalities ² (number of employees)	Number	0	1	0	0	0	0	0	1	0
No of recordable work-related injuries (incl. fatalities)	Number			79			1			80
Male	Number (%)			61 (78%)			0 (0%)			61 (76%)
Female	Number (%)			18 (22%)			1 (100%)			19 (24%)
Number of employees injured	Number	93	114	78	3	3	1	96	117	79
Male	Number (%)	64 (68.8%)	83 (72.8%)	60 (77%)	1 (33.3%)	0 (0%)	0 (0%)	65 (68.0%)	83 (70.9%)	60 (76%)
Female	Number (%)	29 (31.2%)	31 (27.2%)	18 (23%)	2 (66.7%)	3 (100%)	1 (100%)	31 (32.0%)	34 (29.1%)	19 (24%)
Number of high-consequence work-related injuries	Number			0			0			0
Injury rate ³	Number	0.79	1.01	0.73	0.17	0.24	0.11	0.71	0.93	0.68
Male	Number	0.88	1.20	0.98	0.13	0.00	0.00	0.81	1.12	0.93
Female	Number	0.65	0.70	0.34	0.19	0.40	0.17	0.57	0.66	0.32
Recordable work-related injuries (including fatalities) rate ⁴	Number			0.74			0.11			0.69
Male	Number			0.93			0.00			0.88
Female	Number			0.43			0.17			0.40
Occupational disease rate ⁵	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 ⁶	Number	24.17	29.26	21.21	2.93	7.22	0.00	21.33	27.03	19.48
Male	Number	28.82	37.11	28.56	2.51	0.00	0.00	26.34	34.51	27.13
Female	Number	16.55	17.05	9.56	3.24	12.17	0.00	14.00	16.34	8.35
Rate of high-consequence work-related injuries (excluding fatalities)	Number			0			0			0
Absentee rate ⁷	Number	767.93	761.85	662.64	380.32	350.22	1,023.51	719.63	722.87	689.77

² Fatal work accidents do not contain incidents from strictly natural causes.

³ 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.

⁴ Recordable work-related injuries (including fatalities) rate³ = (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.

⁵ 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.

⁶ 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. Last day count begins on the day of the injury or the next day, depending on the time of the day.

⁷ Absentee rate = (Total number of missed absentee days / Total number of workforce days worked) x 25,000. The factor 25,000 is derived from 50 working weeks of 5 days per 100 employees. This rate is not monitored per gender.



Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2018	2019	2020	2018	2019	2020	2018	2019	2020
Health and Safety Issues										
Hours of psychological support consulting services	Hours	1,921	0	1,451	0	0	0	1,921	1,522	1,451
Training on Health and Safety issues	Hours	22,887	9,286	3,540	9,286	6,278	5,536	32,173	24,001	9,076
Training on Health and Safety issues	Hrs per employee	1.81	5.11	0.31	5.11	4.37	5.21	2.23	1.76	0.72
Training on Safety issues (total employee participations)				283			1,937			2,220
Male	Number (%)			270 (95%)			848 (44%)			1,118 (50%)
Female	Number (%)			13 (5%)			1,089 (56%)			1,102 (50%)
Training on Safety issues (total number of employees)				242			1,047			1,289
Male	Number (%)			227 (94%)			446 (43%)			673 (52%)
Female	Number (%)			15 (6%)			601 (57%)			616 (48%)
Training on Health/Wellbeing issues (total employee participations)				2,358			372			2,730
Male	Number (%)			1,680 (71%)			35 (9%)			1,715 (63%)
Female	Number (%)			678 (29%)			337 (91%)			1,015 (37%)
Training on Health/Wellbeing issues (total number of employees)				1,922			62			1,984
Male	Number (%)			1,523 (79%)			17 (27%)			1,540 (78%)
Female	Number (%)			399 (21%)			45 (73%)			444 (22%)
Training on Health/Wellbeing & Safety issues (total number of participations)				2,641			2,309			4,950
Male	Number (%)			1,950 (74%)			883 (38%)			2,833 (57%)
Female	Number (%)			691 (26%)			1,426 (62%)			2,117 (43%)
Training on Health/Wellbeing & Safety issues (total number of employees)				2,164			1,109			3,273
Male	Number (%)			1,750 (81%)			463 (42%)			2,213 (68%)
Female	Number (%)			414 (19%)			646 (58%)			1,060 (32%)



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Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2018	2019	2020	2018	2019	2020	2018	2019	2020
Employee training										
Total participations	Number	9,314	13,765	9,163	4,007	6,131	4,291	13,321	19,896	13,454
Gender										
Male	Number (%)	6,050 (65.0%)	7,445 (54.1%)	5,152 (56%)	1,724 (43%)	2,253 (36.7%)	1,846 (43%)	7,774 (58.4%)	9,698 (48.7%)	6,998 (52%)
Female	Number (%)	3,264 (35.0%)	6,320 (45.9%)	4,011 (44%)	2,283 (57%)	3,878 (63.3%)	2,445 (57%)	5,547 (41.6%)	10,198 (51.3%)	6,456 (48%)
Responsibility level										
Employees with position of responsibility ¹	Number (%)	2,533 (27.2%)	2,504 (18.2%)	1,222 (13%)	316 (7.9%)	249 (4.1%)	486 (11%)	2,849 (21.4%)	2,753 (13.8%)	1,708 (13%)
Employees without position of responsibility	Number (%)	6,781 (72.8%)	11,261 (81.8%)	7,941 (87%)	3,691 (92.1%)	5,882 (95.9%)	3,805 (89%)	10,472 (78.6%)	17,143 (86.2%)	11,746 (87%)
Type of Work										
Office	Number (%)	6,231 (66.9%)	10,683 (77.6%)	8,012 (87%)	901 (22.5%)	1,450 (23.7%)	1,179 (27%)	7,132 (53.5%)	12,133 (61%)	9,191 (68%)
Retail	Number (%)	62 (0.7%)	2,542 (18.5%)	441 (5%)	2,812 (70.2%)	4,339 (70.9%)	3,059 (72%)	2,874 (21.6%)	6,881 (34.6%)	3,500 (26%)
Fieldwork/other	Number (%)	3,021 (32.4%)	541 (3.9%)	708 (8%)	294 (7.3%)	342 (5.6%)	53 (1%)	3,315 (24.9%)	883 (4.4%)	761 (6%)
Total employees who participated in training	Number (%)	5,869 (46.6%)	6,886 (56.5%)	5,229 (45%)	1,677 (92%)	1,436 (100%)	780 (73%)	7,546 (52%)	8,322 (61.1%)	6,009 (47%)
Gender										
Male	Number (%)	4,068 (69.3%)	4,104 (59.6%)	2,867 (55%)	693 (41.3%)	586 (40.8%)	312 (40%)	4,761 (63.1%)	4,690 (56.4%)	3,179 (53%)
Female	Number (%)	1,801 (30.7%)	2,782 (40.4%)	2,362 (45%)	984 (58.7%)	851 (59.2%)	468 (60%)	2,785 (36.9%)	3,633 (43.6%)	2,830 (47%)
Total training hours	Number	127,086	153,271.1	143,007	23,654	19,964	17,646	150,740	173,235	160,653
Gender (hours)										
Male	Hours (%)	88,267 (69.5%)	107,377 (70.1%)	75,127 (53%)	9,519 (40.2%)	7,361 (36.9%)	9,602 (54%)	97,786 (64.9%)	114,738 (66.2%)	84,729 (53%)
Female	Hours (%)	38,819 (30.5%)	45,894 (29.9%)	67,880 (47%)	14,135 (59.8%)	12,603 (63.1%)	8,044 (46%)	52,954 (35.1%)	58,497 (33.8%)	75,924 (47%)
Type of work (hours)										
Office	Hours (%)	84,925 (66.8%)	115,953 (75.6%)	127,404 (89%)	569 (2.4%)	3,377 (16.9%)	8,706 (49%)	85,494 (56.7%)	119,330 (68.8%)	136,110 (85%)
Retail	Hours (%)	1,475 (1.2%)	32,117 (21.0%)	6,027 (4%)	21,859 (92.4%)	15,970 (80%)	8,849 (50%)	23,334 (15.5%)	48,087 (27.8%)	14,876 (9%)
Fieldwork/other	Hours (%)	40,686 (32.0%)	5,201 (3.4%)	9,576 (7%)	1,226 (5.2%)	618 (3.1%)	91 (1%)	41,912 (27.8%)	5,819 (3.4%)	9,667 (6%)
Training hours average (on the basis of headcount average)	Hours per employee	10.08	12.57	12.32	13.03	13.90	16.62	10.45	12.71	12.68
Training per employee by gender (on the basis of headcount average)										
Male	Hours per employee	11.37	14.40	10.61	12.51	12.56	24.73	11.47	14.26	11.34
Female	Hours per employee	8.02	9.70	15.01	13.40	14.82	11.95	8.98	10.48	14.61

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



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Performance Indicators on Human Resources	Unit	GREECE			ROMANIA			OTE GROUP		
		2018	2019	2020	2018	2019	2020	2018	2019	2020
Employee training										
Training per employee by type of work (on the basis of headcount on 31st December)										
Office	Hours per employee	12.07	16.44	18.29	0.82	8.02	24.39	11.06	15.97	18.59
Retail	Hours per employee	1.23	27.78	5.78	24.84	26.40	15.92	11.20	27.31	9.31
Fieldwork/other	Hours per employee	9.73	1.37	3.03	6.77	6.12	1.06	9.61	1.49	2.98
Total training hours by employee seniority										
Average training hours for employees included in the top 10% of employees by total compensation	Hours per employee		20.92	14.66		17.66	17.65		20.64	14.91
Average training hours for employees included in the bottom 90% of employees by total compensation	Hours per employee		11.60	12.61		17.72	17.67		12.13	13.02
Total employee training expenditure	Euros (€)		4,341,209.5	3,263,027		N/A	N/A		4,341,209.5	3,263,027

Other data										
Internships										
University and technical school students who carried out their internship at OTE Group	Number	578	606	395	0	9	12	578	615	407
Parental leave										
Employees who made use of parental leave for childcare		562	552	680	104	77	59	666	629	739
Male	Number	282	315	342	4	8	2	286	323	344
Female	Number	280	237	338	100	69	57	380	306	395
Employees who made use of parental leave without pay		52	154	39	3	1	1	55	155	40
Male	Number	4	2	4	1	0	0	5	2	4
Female	Number	48	152	35	2	1	1	50	153	36
Employees who made use of parental leave for child upbringing at 1/3 pay		3	1	0	0	0	0	3	1	0
Male	Number	0	0	0	0	0	0	0	0	0
Female	Number	3	1	0	0	0	0	3	1	0
Employees who returned to work after the use of parental leave		286	445	561	88	99	82	370	544	643
Male	Number	78	280	337	3	9	5	81	289	342
Female	Number	208	165	224	85	90	77	289	255	301



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Environmental Performance Data



Noise and Visual Impact (Relevant for GRI Standard 305)

NOISE

In general, the noise impact from the activities of OTE Group companies is insignificant, as it is restricted to (a) the operation of electricity generators that are necessary in cases of power outage or when there is no reliable electricity supply, (b) ventilation systems (e.g. supply and exhaust units) and (c) the outdoor air-conditioning units located in building roofs, facades and open spaces (e.g. cooling towers).

- The operation of electricity generators in urban areas is in line with the provisions foreseen by legislation. In special cases, where sound levels from generators should be reduced, soundproofing constructions are placed or hybrid systems are installed, to reduce the operating hours of the generators, or old units are replaced with new, more advanced ones that operate at lower noise levels.
- In order to reduce noise levels from ventilation and/or cooling systems to the levels foreseen by legislation, soundproofing constructions are placed, or old units are replaced with new, more advanced ones that operate at lower noise levels.

VISUAL IMPACT

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

- The size of new Base Stations being built now has been decreased
- Efforts are made to collocate Base Stations in common installations with the other telephony companies so as to reduce all potential impacts, including overall visual impact of mobile Base Stations
- For the installation of new telecommunication infrastructure necessary for the provision of communication services, all efforts are made, to the extent that is technically feasible, to minimize the visual intrusion produced, especially in urban areas by appropriate arrangements and constructions that blend well with the surrounding environment (61 special constructions in Greece).
- Appropriate modifications are also applied to existing telecommunication infrastructure (2 special construction in Greece).

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

- Emissions of typical air pollutants (NO_x, SO₂, PM₁₀ and VOCs) are mainly related to road transportation and the use of electricity generators to support the operation of the telecom network
- Emissions of Persistent Organic Pollutants (POP) and Hazardous Air Pollutants (HAP) are of minor importance as:

- Transformers and capacitors which could have been a significant source of PCB (Polychlorinated biphenyls) emissions due to leakage, have been decommissioned, disposed of and replaced by new ones that do not contain PCB, in line with the provisions of legislation in force.
- The vehicles fleet of OTE Group companies do not include vehicles using leaded gasoline

NO_x



PM₁₀



SO₂



VOCs



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



OTE Group Environmental Performance Data - Waste

OTE WASTE		GREECE			ROMANIA			OTE GROUP		
Category	Materials / Waste streams ¹	2018	2019	2020	2018	2019	2020	2018	2019	2020
Materials / Resources consumption										
	Water (m ³)	223,986	174,501	160,084	10,075	9,088	4,972	234,062	183,589	165,056
	Paper	188,226	164,189	110,714	100,500	99,500	73,590	288,726	263,689	184,304
	Packaging materials	750,733	208,210	166,628	45,954	27,052	8,779	796,687	235,262	175,407
Hazardous		985,799	1,629,397	1,432,101	91,384	0	82,520	1,077,183	1,629,397	1,514,621
	Technical - Hazardous									
	Lead batteries	565,526	793,272	735,027	91,384	0	82,520	656,910	793,272	817,547
	Various ²	411,135	827,950	685,705	N/A	N/A	N/A	411,135	827,950	685,705
	Non technical - Hazardous									
	Lubricants	6,988	6,368	5,468	N/A	N/A	N/A	6,988	6,368	5,468
	Refrigerants and various chemicals	2,150	1,807	5,901	N/A	N/A	N/A	2,150	1,807	5,901
Technical		2,182,697	2,376,322	3,061,343	34,908	123,205	73,466	2,217,604	2,499,526	3,134,809
	Telecom network									
	Metals	1,369,307	966,066	1,328,848	17,991	29,400	22,594	1,387,298	995,466	1,351,442
	Cables	542,171	1,147,123	1,402,736	2,479	2,560	200	544,650	1,149,683	1,402,936
	WEEE ³	154,346	162,271	212,928	10,155	63,425	43,783	164,501	225,696	256,711
	Shops									
	Phones and accessories	42,653	35,001	26,795	338	22	1	42,991	35,023	26,796
	Home batteries	26,427	29,571	21,253	0	0	44	26,427	29,571	21,297
	Obsolete merchandise ⁴	47,793	36,291	68,784	3,945	27,798	6,844	51,738	64,089	75,628
Paper		330,605	293,746	183,844	100,500	99,500	73,590	431,105	393,246	257,434
	Solid waste disposal sites	151,713	160,617	109,676	91,298	74,552	59,978	243,011	235,169	169,654
	Recycling	178,892	133,129	74,168	9,202	24,948	13,612	188,094	158,077	87,780



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OTE WASTE		GREECE			ROMANIA			OTE GROUP		
Category	Materials / Waste streams ¹	2018	2019	2020	2018	2019	2020	2018	2019	2020
Residual		1,203,595	621,392	643,375	195,673	205,394	190,622	1,399,268	826,786	833,997
	Packaging materials									
	Offices	7,718	7,431	12,370	2,176	1,436	1,647	9,894	8,867	14,017
	Warehouses	316,460	202,250	360,695	14,337	35,039	13,919	330,797	237,289	374,614
	Municipal Solid Waste⁵									
	Offices	219,884	204,146	108,517				399,044	373,001	283,550
	Warehouses	655,333	204,960	160,224	179,160	168,855	175,034	655,333	204,960	160,224
	Ink-cartridges									
	Offices ⁶	2,827	1,621	840	0	64	23	2,827	1,685	862
	Customers (take-back)	1,373	984	729	N/A	N/A	N/A	1,373	984	729
Other		16,893	66,237	42,714	0	0	0	16,893	66,237	42,714
	End of life vehicles									
	Tires and other waste	1,090	66,237	42,714	N/A	N/A	N/A	1,090	66,237	42,714
		15,803	0	0	0	0	0	15,803	0	0

1. All quantities in kg, unless otherwise stated. Quantities forwarded to solid waste disposal sites are estimates
 2. Telephone poles, products out of specification, packaging with hazardous substances that are not produced on a permanent basis
 3. Quantities of waste fluorescent lamps and electrical appliances are included
 4. Quantities included are not restricted to shops
 5. Quantity of paper disposed is not included
 6. Quantities from warehouses are included



OTE Group Environmental Performance Data - Energy

Category	Units	GREECE			ROMANIA			OTE GROUP		
		2018	2019	2020	2018	2019	2020	2018	2019	2020
Energy consumption¹	GWh	556.55	554.54	494.64	94.61	111.28	124.61	651.16	665.82	619.25
Electricity										
Telecom network	GWh	419.92	418.58	370.71	73.65	91.59	110.00	493.57	510.17	480.71
Buildings ²	GWh	69.64	71.61	67.37	12.05	12.12	10.52	81.69	83.73	77.89
Stationary installations										
Heating oil	GWh	2.56	2.84	3.03	-	-		2.56	2.84	3.03
Natural gas	GWh	5.51	5.00	4.46	1.15	1.12	0.58	6.66	6.12	5.04
District heating	GWh	0.34	0.38	0.31				0.34	0.38	0.31
Diesel for electricity generators	GWh	17.82	17.29	14.70	0.14	0.29	0.11	17.96	17.58	14.81
Road transportation										
Unleaded gasoline	GWh	12.78	12.24	9.88	0.09	0.03	0.01	12.87	12.28	9.90
Diesel	GWh	27.98	26.59	24.17	7.54	6.13	3.39	35.52	32.73	27.56
GHG emissions³										
Direct emissions										
Space heating ⁴	t CO ₂ eq	1,802	1,775	1,717	292	227	118	2,094.50	2,001.76	1,834.78
Electricity generators ⁴	t CO ₂ eq	4,782	4,639	3,944	38	77	30	4,819.86	4,715.99	3,974.12
Vehicles ⁴	t CO ₂ eq	10,274	9,788	8,594	1,955	1,581	873	12,228.72	11,368.87	9,467.46
HFCs - AC systems ⁵	t CO ₂ eq	12,412	10,401	10,133	N/A	N/A	N/A	12,412.14	10,401.33	10,133.33
Indirect (scope 2) emissions, location-based⁶										
Telecom network	t CO ₂ eq	219,214	223,239	202,373	23,715	31,489	36,839	242,929.15	254,728.69	239,211.93
Buildings	t CO ₂ eq	36,429	38,273	36,844	3,879	4,167	3,522	40,308.31	42,440.32	40,366.17
Indirect (scope 2) emissions, market-based⁶	t CO ₂ eq	5,867	2,358	66	36,506	41,753	37,599	42,373.14	44,110.22	37,664.98



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Category	Units	GREECE			ROMANIA			OTE GROUP		
		2018	2019	2020	2018	2019	2020	2018	2019	2020
Transport	GWh									
Service vehicles										
Unleaded gasoline vehicles	#	716	734	760	11	6	1	727	740	761
Diesel vehicles	#	2,093	2,059	2,010	464	372	340	2,557	2,431	2,350
Distance covered	km	39,789,152	38,550,353	28,950,064	9,940,039	8,318,611	4,524,218	49,729,191	46,868,964	33,474,282
Company vehicles										
Unleaded gasoline vehicles	#	206	196	196	3	4	2	209	200	198
Diesel vehicles	#	162	152	145	78	66	43	240	218	188
Distance covered	km	7,150,740	7,196,788	5,052,504	1,521,154	1,100,313	649,832	8,671,894	8,297,101	5,702,336

1. Energy consumption is based on actual consumption data for most months of a year, which is extrapolated to the end of that year due to data provision arrangements within the DT group, where relevant
2. The term "Buildings" describes Offices, Data Centers, Warehouses and Shops
3. GHG emissions calculated include CO₂, CH₄, N₂O and F-gases from AC systems. To ensure harmonized reporting among DT Group companies, Global Warming Potential (GWP) values used, are those included in the 5th Assessment Report (AR) of IPCC. Past values (originally estimated with AR4 GWP values) have been recalculated
4. Direct GHG emissions from energy consumption are calculated on the basis of the emission factors suggested by the Greenhouse Gas Protocol and the 2005 IPCC Guidelines
5. Emissions are calculated on the basis of data concerning replenished quantities
6. Location-based 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.



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	Switching off unused telecom equipment
Infrastructure Modernization / Optimization	Telecom network	Greece	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	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	Mobile telecom equipment modernization using lower power consumption hardware.
RAN Energy Features	Telecom network	Greece	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. In 2020, the building area used by OTE decreased by about 7% compared to 2019.
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.



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ENERGY CONSERVATION MEASURES	SCOPE	COUNTRY	RESULT
Energy measures in Data Centers	Data Centers	Greece	Energy conservation measures aiming to improve the PUE of data centers
Energy management	All types of installations	Greece	Perform Energy Audits and detect measures that should be taken in order to improve the energy efficiency of the installed equipment, Apply Energy Management System according to ISO 50001 standard, Installation of BEMS systems in critical sites.
Teleconferences	Mobility	Greece	In 2020, 11,006 audio-conferences were held



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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
<p>A) Describe the board's oversight of climate-related risks and opportunities.</p>	<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>
<p>B) Describe management's role in assessing and managing climate-related risks and opportunities.</p>	<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
<p>A) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.</p>	<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>
<p>B) Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.</p>	<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>
<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>	<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. More advanced use of climate scenarios is expected in the forthcoming years.</p>



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PILLAR 3 – RISK MANAGEMENT	COMMENTS/SECTIONS
<p>A) Describe the organization's processes for identifying and assessing climate-related risks.</p>	<p>Stakeholder Dialogue Enterprise Risk Management Environmental Strategy 2020 Annual Financial Report (p. 15-24, 56-57)</p>
<p>B) Describe the organization's processes for managing climate-related risks.</p>	<p>Responsible Purchasing and Supply Chain Management Business Continuity Environmental Strategy Energy and Climate Change</p>
<p>C) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.</p>	<p>Stakeholder Dialogue Enterprise Risk Management 2020 Annual Financial Report (p. 15-24, 56-57)</p>
PILLAR 4 – METRICS AND TARGETS	COMMENTS/SECTIONS
<p>A) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.</p>	<p>Energy and Climate Change Environmental Performance Data – Energy Metrics related to green revenues are currently not disclosed</p>
<p>B) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.</p>	<p>Environmental Strategy Energy and Climate Change Environmental Performance Data – Energy</p>
<p>C) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.</p>	<p>Key Achievements and Targets Energy and Climate Change</p>



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Independent Limited Assurance Report to the Management of OTE Group



The 2020 OTE Group Integrated Report (“IR 2020”) has been prepared by OTE Group’s Management, which is responsible for the collection and presentation of the information contained therein. Our responsibility is limited in carrying out a limited assurance engagement on specific scope of the IR 2020. The IR 2020 relates to the OTE Group. OTE Group and the entities comprising it is defined in the IR 2020.

Scope of Work

Our engagement was designed to provide limited assurance on a specific scope of the IR 2020 for OTE, COSMOTE and selected OTE Group entities’ data, as specified below:

- The provision of Type 2 Moderate Assurance on the adherence of the IR 2020 to AA1000 AccountAbility Principles (2018), as described in the section titled “Accountability Principles Standard AA1000 Index” in the Appendix of the IR 2020.
- The provision of limited assurance on the reliability of the quantitative data and the reasonability of statements related to the Global Reporting Initiative (“GRI”) General Disclosures that are required as a minimum prerequisite for the “In accordance – Core” option, as indicated in the section titled “Global Reporting Initiative Content Index” in the Appendix of the IR 2020.
- The provision of limited assurance on the reliability of quantitative data and the reasonability of statements that correspond to the following eight (8) material topics, that were identified by OTE Group through the materiality analysis, for OTE and COSMOTE MOBILE TELECOMMUNICATIONS S.A. (“COSMOTE”), against the requirements of the respective GRI Standards for the Specific Disclosures and the requirements of GRI 103 Standard “Management Approach” (“MA”), as indicated in the section titled “Global Reporting Initiative Content Index” in the Appendix of the IR 2020:
 - Ethical Business Practices (MA, GRI 205-1, GRI 205-3, GRI 206-1, GRI 419-1)
 - Fair Employment and Employee Management (MA, GRI 401-1, GRI 405-1)
 - Employee training and skills development (MA and GRI 404-1)
 - Employee Health, Safety and Wellness (MA, GRI 403-1-GRI 403-7 and GRI 403-9)
 - Data security and privacy (MA and GRI 418-1)
 - Customer service and satisfaction (MA and Results of surveys measuring customer satisfaction (TRI*M Index, NG ICCA Program))
 - Business continuity (MA)
 - Electromagnetic fields (MA, GRI 416-1 and 416-2)
- The provision of limited assurance on the reliability of quantitative data and the reasonability of statements that correspond to the following seven (7) additional Topic Specific Disclosures, for OTE and COSMOTE, against the requirements of the respective GRI Standards for the Specific Disclosures, as indicated in the section titled “Global Reporting Initiative Content Index” in the Appendix of the IR 2020: GRI 302-1, GRI 302-3, GRI 305-1, GRI 305-2, GRI 305-4, GRI 306-2.
- The provision of limited assurance on the reliability of the consolidation method used to report Group quantitative data for all the above mentioned GRI Topic Specific Disclosures.
- The provision of limited assurance on the adherence of the IR 2020 to the Athens Stock Exchange ESG Reporting Guide. In particular, we evaluated the reliability of the disclosed ATHEX ESG metrics, regarding environmental, social and governance issues, as disclosed in the section titled “ATHEX Guide Index” in the Appendix of the IR 2020.
- The provision of limited assurance on the adherence of the IR 2020 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 2020.
- The provision of limited assurance on the alignment between the United Nations’ (UN) Sustainability Development Goals and OTE Group’s sustainability strategy.
- The provision of limited assurance on the reliability of the quantitative data for OTE, COSMOTE, GERMANOS S.A. (“GERMANOS”), OTE INTERNATIONAL SOLUTIONS S.A. (“OTEGLOBE”), OTE ACADEMY S.A. (“OTE Academy”), COSMOTE E-VALUE SERVICES CONTACT CENTER S.A. (“COSMOTE e-Value), 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 phone devices and accessories (t)
 - EMF measurements (number of measurements)
 - Suppliers evaluated (% of the annual procurement value)

The quantitative data on the above non-financial indicators are included within the IR 2020. Certain non-financial indicators form part of the relevant GRI General or Topic-Specific Disclosures. For certain non-financial indicators, which are not covered by a relevant GRI General or Topic-Specific Disclosure, OTE has developed the methods of calculation of these non-financial indicators. The disclosure of these methods of calculation can be found in the OTE Group of Companies Annual Financial Report 2020 (“Annual Report 2020”).

Our work was related to assurance on data and information for the period 1 January 2020 – 31 December 2020 and we do not provide assurance over any prior reporting period data or information presented in the IR 2020.

We performed assurance services in accordance with the provisions of “International Standard on Assurance Engagements ISAE 3000 (Revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information” (“ISAE 3000”), issued by the International Auditing and Assurance Standards Board (IAASB) and the requirements for a Type 2 Moderate assurance under AA1000 Assurance Standard v3. Our procedures for collecting evidence were designed in order to obtain a limited level of assurance. The procedures in a limited assurance engagement in accordance with ISAE 3000, vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained, had a reasonable assurance



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engagement been performed. The moderate level of assurance in AA1000 Assurance Standard v3 is consistent with limited assurance in ISAE 3000.

Our key assurance procedures

- Reviewed the processes of OTE Group for identifying and determining material topics to be included in the IR 2020 and the coverage of these material topics within the IR 2020. Also, we performed a media review for topics relevant to OTE and COSMOTE regarding issues of corporate responsibility and sustainable development, a review of sustainability reports of selected peers and we compared the results from the media and peers' review with the material topics identified by OTE Group;
- Reviewed the accuracy and completeness of quantitative data related to the results from the materiality analysis conducted by OTE Group and the reasonability of statements that pertain to the application of the Materiality Principle;
- Performed interviews with employees from various organisational levels of OTE Group with regards to stakeholder inclusivity, materiality, responsiveness and impact;
- Assessed adherence to the AA1000 AccountAbility Principles (2018) and reviewed the reliability and quality of information disclosed, based on relevant supporting documentation and inquiries performed for OTE Group;
- Performed interviews with personnel of OTE Group responsible for managing, collecting and processing data relating to the GRI General and Specific Disclosures, under the scope of our engagement, in order to obtain an understanding of the processes applied for the preparation of the relevant Disclosures of the IR 2020;
- Performed analytical review procedures on the quantitative data related to the GRI General and

- Specific Disclosures, under the scope of our engagement, and made pertinent inquiries to responsible personnel. In addition, we tested, on a sample basis, the accuracy of the quantitative data against corresponding supporting documentation;
- Performed interviews with the relevant personnel in order to obtain an understanding of OTE Group corporate responsibility and sustainable development policies and activities for the reporting period and the statements related to the GRI General and Specific Disclosures, under the scope of our engagement. We also assessed the reasonability of the statements related to the GRI General and Specific Disclosures, under the scope of our engagement, by obtaining for a sample of statements, corresponding supporting documentation;
- Reviewed the IR 2020 for the appropriate presentation of the GRI General and Specific Disclosures, under the scope of our engagement, including discussions with the relevant personnel about limitations and assumptions relating to the way these data are presented;
- Reviewed, on a sample basis, the consolidation method used to include OTE Group quantitative data into the Report for the GRI Topic-Specific Disclosures under the scope of our engagement;
- Reviewed, on a sample basis, the reliability of the disclosed ATHEX ESG metrics, regarding environmental, social and governance issues, as disclosed in the section titled "ATHEX Guide Index" in the Appendix of the IR 2020;
- Reviewed the adherence of the IR 2020 to the United Nations Global Compact (UNG) 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 2020;
- Reviewed the alignment between the United Nations' (UN) Sustainability Development Goals and OTE Group's sustainability strategy;
- Performed interviews with responsible personnel and obtained, on a sample basis, relevant supporting documentation for the quantitative data reported for OTE, COSMOTE, GERMANOS, OTEGLOBE, OTE Academy, COSMOTE e-Value and Telekom Romania Mobile Communications for 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 phone devices and accessories (t)
 - EMF measurements (number of measurements)
 - Suppliers evaluated (% of the annual procurement value)

Limitations

- Our assurance services were limited to the English version of the IR 2020. In the event of any inconsistency between the English and Greek versions, as far as our conclusions are concerned, the English version prevails.
- Where, under the scope of our engagement, financial information was used from the Annual Report 2020 and other published information of

- OTE Group entities included in IR 2020, our work was limited to check the accuracy of the transfer of the relevant information to the IR 2020.
- Our assurance procedures did not include testing the Information Technology systems from which data was extracted and aggregated by OTE Group for the IR 2020.
- 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 2020.
- We do not provide any assurance relating to future performance, such as estimates, expectations or targets, or their achievability.

Our independence and quality control

- Deloitte applies International Standard on Quality Control 1 and, accordingly, maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.
- We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. We have maintained our independence and objectivity and, in particular, that there were no events or prohibited services provided which could impair our independence and objectivity.



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Our team

Our team consisted of professionals with assurance qualifications and a combination of environmental, sustainability and stakeholder engagement experience, including an extensive experience in providing sustainability assurance.

Roles and responsibilities

OTE

OTE Group's Management is responsible for the preparation of the IR 2020 in accordance with the following principles, guidelines and directives:

- The GRI Sustainability Reporting Standards ("GRI Standards")
- The AA1000 AccountAbility Principles (2018) of Inclusivity, Materiality, Responsiveness and Impact
- The United Nation's Global Compact Principles
- The Athens Stock Exchange (ATHEX) ESG Reporting Guide
- The criteria of the Greek Sustainability Code.
- In addition, the guidelines of the Task Force on Climate-related Financial Disclosures (TCFD) were also considered.

OTE Group's Management is responsible for the information and statements contained within the IR 2020 and for establishing and maintaining appropriate performance management and internal control systems used for the production of the reported information.

Deloitte

Our responsibility is to independently express our conclusion to OTE's Management in relation to the assurance services defined in the Scope of Work above, in accordance with our letter of engagement. Our work has been undertaken in

order to inform OTE 's Management on the results of the limited assurance engagement and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than OTE for our work, for this statement or for the conclusions we have reached.

Key observations in relation to AA1000

Based on the work described above, the key observations regarding the principles of Inclusivity, Materiality, Responsiveness and Impact set out in the AA1000AS v3 are as follows:

- **Inclusivity:** OTE Group is committed towards being accountable to its stakeholders. The Group has implemented a comprehensive and efficient stakeholder engagement process, is well aware of its stakeholder concerns and expectations and consistently integrates the views of stakeholders at all levels.
- **Materiality:** OTE Group has established a process for determining materiality that is applied across the organization on an ongoing basis. In particular, the Group identifies the most important issues of its sustainable development through the materiality assessment process carried out in accordance with the Group's unified Enterprise Risk Management methodology.
- **Responsiveness:** OTE Group has established a process for responding to the topics raised by its stakeholders. The Group's responses were found to be related to the stakeholders' concerns and issues and were conducted in a timely, fair and appropriate manner.
- **Impact:** OTE Group has robust processes in place for understanding, measuring and managing its impacts, including risk

management and development of action plans. A wide range of sustainability impacts are presented in the Integrated Report, both qualitatively and quantitatively, in alignment with the Group's strategy. It is recommended OTE Group to continue to report on the progress against its sustainability impacts as well as monitor and measure the social changes that result from its activities and the long-term impacts on its stakeholders and on business itself.

Our conclusions

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that:

- The IR 2020 does not adhere, in all material respects, to the AA1000 AccountAbility Principles (2018) and that the relevant information disclosed is materially misstated.
- The GRI General and Specific Disclosures, under the scope of our engagement, are materially misstated.
- The consolidation method used to report Group quantitative data, for all the GRI Topic Specific Disclosures under the scope of our engagement, is materially misstated.
- The IR 2020 does not adhere, in all material respects, to the Athens Stock Exchange ESG Reporting Guide.
- The IR 2020 does not adhere, in all material respects, to the United Nations Global Compact (UNGC) Communication on Progress (CoP) requirements, against the requirements of the criteria for the "Advanced" level.
- OTE Group's sustainability strategy as disclosed in the IR 2020, is not in alignment with the United Nations' (UN) Sustainability Development Goals.

- The quantitative data disclosed in the IR 2020, for OTE, COSMOTE, GERMANOS, OTEGLOBE, OTE Academy, COSMOTE e-Value and Telekom Romania Mobile Communications for specific non-financial indicators, as described in point (9) of the Scope of Work above, are materially misstated.

Athens, 03 June 2021

The Certified Public Accountant

Dimitris Katsibokis

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