

WIND

Sustainability Report

2019 > 2020





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01

MESSAGE FROM THE CHAIRMAN OF THE BOARD & CEO

Dear Friends,

This open letter is an opportunity for me to speak on behalf of our entire organization and to share with you the vision shared by our people and the value that our Company brings to Greek society.

The pandemic has changed our world radically and permanently. Economic and social inequalities have become increasingly pervasive worldwide. Climate change has ceased to be a matter of academic study and high politics, and we have all become aware that the planet is suffering. Science and technology have been called upon to expand their boundaries in record time so that we can return to economic and social normalcy.

I am in awe of what we have achieved during this time and greatly optimistic about the next steps. The battle was fought by all of us. From scientists, doctors and nurses, to employees, students, families and friends.

Especially for us working in technology, the responsibility has been extraordinary. Never before in the history of telecommunications, has it been so critical to respond to the needs of humanity and offer our services and connectivity to the people.

I am proud that we have supported our subscribers with the capabilities of our networks with empathy and care during this crisis and safeguarding the well-being of our employees, putting their health and safety first. I want to thank all WIND Hellas employees who responded with determination, strength, courage and high spirits to this enormous challenge.

This effort brought results in terms of business operations. In this challenging environment, WIND Hellas maintained strong financial figures that clearly demonstrate that we have effectively absorbed the tremors of the COVID-19 pandemic.

Armed with our strategic advantages, the tireless efforts of our people and our commitment to our values, we have remained on a steady path of growth. Overcoming the extremely difficult conditions, we continued to contribute with investments and innovative services to the digital transformation of our country.

WIND Hellas, having as its legacy the lessons and achievements of the pandemic, is able to once again pursue the acceleration of its growth. Operating with vision, prudence and determination, our Company will intensify its investments in both 5G and fiber optic networks and digital platforms, in order to offer excellent technology and communication services.



Corporate Responsibility is now identified with Business Excellence. We have one choice: to be a great and modern organization that meets the challenges of the present and the future with faith in the exciting possibilities of technology and with an emphasis on Sustainable Development.

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The Sustainability Report for the years 2019-2020 that you hold in your hands continues the tradition of transparency and accountability. A milestone for the next 5 years is to achieve 25 Sustainable Development Goals by 2025 and in the pages that follow you can read in detail the policies, methodology, commitments and actions we are implementing to create long-term value for all our stakeholders, society and the environment.

Nassos Zarkalis
Chairman & CEO, WIND Hellas



02

WIND HELLAS

We invest in development

At WIND Hellas we put digital transformation into practice and contribute with the new generation networks to the development of innovative applications that create social value for every one of us. Our aim is to provide new possibilities, for everyone, regardless of where we are, so that we can all participate equally in the digital society of tomorrow.

The Company & Milestones

WIND Hellas was founded in 1992. In June 1993, the first mobile phone call was made from our network in Greece.

Throughout all these years, WIND Hellas has established itself as a pioneer in mobile telephony technology and introduced innovative products that changed the status quo in the field of communications. Today WIND Hellas has a total of 4.2 million subscribers in mobile telephony, fixed telephony and pay TV.

The Company continues to invest in new generation infrastructures in both mobile and fixed telephony and the Internet and develops a proprietary fiber optic network with speeds up to 1 Gbps. In 2018, the Company entered the field of pay TV by introducing WIND VISION. In 2020, its 5G pilot network started operating in Athens and Thessaloniki, with the aim of achieving a population coverage of more than 60% in the first three years.

Products & Services

WIND Hellas, offers mobile and fixed telephony services, broadband Internet and pay TV.

Our basic products in 2019 and 2020 were:

Individuals

Mobile & Fixed Telephony Bundles:

- ▶ WIND ONE Prepaid
- ▶ WIND ONE 2GB (and 50 MBPS, 100FTTH)
- ▶ WIND ONE 5GB (and 50/100/200MBPS, 100/200FTTH)
- ▶ WIND ONE 10GB (and 50/100/200MBPS, 100/200FTTH) (available from July 2020)
- ▶ WIND ONE Unlimited GB (and 50/100/200MBPS, 100/200FTTH)

Mobile Plans - Contract:

- ▶ W 2GB
- ▶ W 5GB
- ▶ W Unlimited GB
- ▶ W 10GB (available from July 2020)
- ▶ WIND Basic Prepaid
- ▶ WIND Plus Prepaid

Mobile Prepaid Plans:

- ▶ F2G
- ▶ Q

Fixed Telephony & Internet Plans:

- ▶ WIND Double Play (Basic, Plus, 50, 50 Plus)
- ▶ WIND Broadband (Basic, 50)
- ▶ WIND Fiber (100, 100 Plus, 200 Plus)

Mobile Broadband Plans:

- ▶ SimpleFi (SimpleFi / SimpleFi 2) (contract)
- ▶ SimpleFi on the Go (5/10/20/30 Gb) (contract)
- ▶ WIND Mobile Broadband (prepaid)

WIND VISION, a subscription TV service with 2 packs:

- ▶ Family Pack (more than 50 subscription channels)
- ▶ Full Pack (Family Pack channels + 6 sports channels - Superleague and Euroleague)



Subscribers have access to the subscription channels from a total of 5 devices, while they can watch simultaneously from the decoder and 2 additional devices, including the application for Smartphone & Tablet that provides Chromecast capability, but also the computer through the website www.windvision.gr.

myWIND Business application

The myWIND Business application, which is primarily addressed to corporate clients, was launched in 2019 to allow users to manage all the connections of their business, check the balance per line, pay bills, be notified about new offers and activate new services and plans.

Businesses

Mobile Plans - Contract:

- ▶ W Business Unlimited and W Business Unlimited Plus for unlimited calls
- ▶ W Business (x)GB
- ▶ XS Business
- ▶ Business Control 300
- ▶ Business MBB Control
- ▶ SimpleFi 1 & 2

Mobile Fleet Management Plans:

- ▶ Mobile Fleet Management

Freeze Alert Plans:

- ▶ Wind Freeze Alert

Customer Relationship And Promotion Management Plans:

- ▶ WIND Marketapp

Corporate Fixed Telephony Plans:

- ▶ Business Double Play Basic
- ▶ Business Telephony
- ▶ Business AddOn
- ▶ Business Telephony Solutions
- ▶ Business Internet Solutions
- ▶ Business Connect
- ▶ Free number (800)
- ▶ One number (801)
- ▶ Business Double Play 50
- ▶ Business Fiber 100
- ▶ Business Fiber 200

Financial Growth & Feature Figures

WIND Hellas is one of the largest private investors in Greece. In 2019 it invested €87 million and in 2020 it invested €90 million in network modernization and new generation infrastructure, creating value for society and contributing to

the development of the economy and the competitiveness of the country. Crystal Almond Holdings Limited is WIND Hellas's parent company.

Financial data

Description	2018	2019	2020
Turnover	495.4*	517.2	508.6
Investments	97.7	87.1	89.9
Insurance contributions	7.1	6.6	6.0
Total financial liabilities	277.6	519.2	520.3
Total equity	272.1	39.8	329.5
Total assets	841.4	1,121.5	1,767.1
Customers of mobile, fixed telephony and Wind Vision	4.1	4.4	4.2
Number of stores at the end of the period	203	194	194
Employees (FTEs)	919	877	874
Employees (Heads)	920	878	875

*Financial Statements of Crystal Almond Intermediary Holdings Limited 2019-2020.

*The financial results for the year 2018 have been adjusted according to IFRS15 standard.

The financial results are calculated according to the standards that accompany the annual financial statements. All financial figures are in millions of euros.

Participation

WIND Hellas participates in associations and international/national organizations and committees and contributes to the industry's progress through the exchange of expertise, as well as the sustainable development issues, while supporting entrepreneurship and competitiveness of Greece.

In this context, the Company is an active member of:

Professional bodies

- ▶ Greek Mobile Operators Association (EEKT)
- ▶ Hellenic Federation of Enterprises (SEV)
- ▶ Athens Chamber of Commerce & Industry (ACCI)
- ▶ Federation of Hellenic ICT Enterprises (SEPE)
- ▶ European Competitive Telecommunications Association (ECTA)
- ▶ GSM Association
- ▶ Greek e-Commerce Association (GR.EC.A.)
- ▶ Hellenic Advertisers Association (SDE)
- ▶ Hellenic Management Company (AED)

- ▶ Hellenic American Chamber of Commerce

Bodies for sustainable development

- ▶ Hellenic network for Corporate Social Responsibility
- ▶ Council for Sustainable Development of the Federation of Enterprises & Industries
- ▶ Sustainable Greece 2020 (Sustainability Ambassador)
- ▶ Corporate Responsibility Institute (CRI)

We promote responsible entrepreneurship and technological innovation

We actively participate in events and conferences that promote issues concerning our industry, the Greek economy and sustainable development as well as technological innovation in Greece and abroad.

Thus, in 2019, our participation included:

The Economist - Europe: Leaving indecisiveness behind?

Political, business and academic leaders from all over the world have analyzed the social, political and economic issues faced by both Greece and Europe in general.

4th Annual Conference "Sm@rt Cities - Digit@l Citizens"

Executives from local and regional authorities and from private bodies presented experiences, know-how, opinions, proposals and good practices, highlighting the state-of-the-art design tools of the Greek "smart cities".

Thus, in 2020, our participation included:

The Economist - Europe: Reinforcing cohesion in turbulent times

The impact of the COVID-19 pandemic on the global economy and businesses, Brexit, migration flows, economic uncertainty and geopolitical tensions in the region were the topics covered by the event.

Digital Economy Forum virtual edition - Building digital Greece

The catalytic role and the innovative solutions offered by digital technology in critical sectors of the economy and the new innovative reforms in telecommunications and smart home were the topics covered by the event.

Distinctions

2019

CR Index 2018-2019
National Corporate Responsibility Index - PLATINUM distinction and special praise for the performance of the Company to society



2020

CR Index 2019-2020
National Corporate Responsibility Index - Diamond distinction



A photograph of a man and a young child planting a tree in a garden. The man, wearing an orange hoodie and glasses, is kneeling and holding a small tree with soil. The child, wearing a blue sweater and yellow boots, is kneeling next to him, holding a small shovel. The background is a lush green garden with trees and a white mug on the ground.

03

SUSTAINABLE DEVELOPMENT

We do business responsibly

The critical importance of digital connectivity in everyday life is demonstrated every day during the COVID-19 crisis. Our business activity played a key role in the quest for normalcy, as through connectivity, distance working and learning became a reality. If the pandemic had occurred 20 years ago, all the things that we could do remotely would not have been possible.

Our approach towards sustainable development

For us sustainable development is integrated into our business model in order to create value for all of our stakeholders, the people, (employees, suppliers, customers, state authorities), society and the environment.

20 Goals for 2020

Setting goals has been our priority since we integrated corporate responsibility to our operations and as a valuable tool for creating long-term relationships of trust with the Greek society and our Stakeholders. The «20 Goals for 2020» strategy consisted of 20 Goals for a better tomorrow. As shown in the diagram, out of the 20 goals in the 5-year plan, 13 goals were achieved by 100%. Six goals, were marginally off as they were affected by the pandemic and one goal will be completed in 2021.



Our People

Annual Employee Survey ≥ 88% participation.	The goal was marginally missed. Participation reached 85% of employees up to July 2020.	
Employee Commitment ≥ 70%.	The goal was surpassed and reached 75%.	
“EuWIND” program ≥ 80%.	Participation reached 65%. The goal was not met due to COVID-19.	
Flexible schedule for 80% employees.	The goal was surpassed and reached 88%.	
Women in Managerial Positions 20%.	The goal was surpassed and reached 24%.	
Skills training 30 hours per employee annually.	The goal was surpassed in 2018 with 39.4 hours.	
Sustainable Development training 100% of employees.	Due to COVID-19, 70% of employees were trained. The program is to be continued in the 25 Goals for 2025.	

Society

20% increase awareness for kids@safety program.	The goal was achieved in 2018.	
Program «COME CLOSER» - add 3 new destinations each year.	The goal was not met due to COVID-19. The goal is included in the 25 Goals for 2025.	

Market

Customer Satisfaction Index (CSAT) ≥ 80%.	The goal was surpassed and reached 88.39%.	
Overdue Receivables Management Program at 50% consistency rate and 90% Customer Satisfaction Index.	Marginal deviation from the original goal. The second goal was achieved by 91%.	
Expenditure to domestic Suppliers ≥ 90% of the total	The goal was surpassed and reached 93.4%	
National Corporate Responsibility Index (CR Index) 95% performance- DIAMOND.	The goal was surpassed. We received the highest distinction with a percentage of 96.31%.	
Fiber Optic Network 500,000 fiber lines.	Marginal deviation from the original goal. The active lines reached 390,000 by the end of 2020.	
Keep customers informed and engaged for the 20 Goals for 2020.	The goal was achieved and is included in the 25 Goals for 2025.	

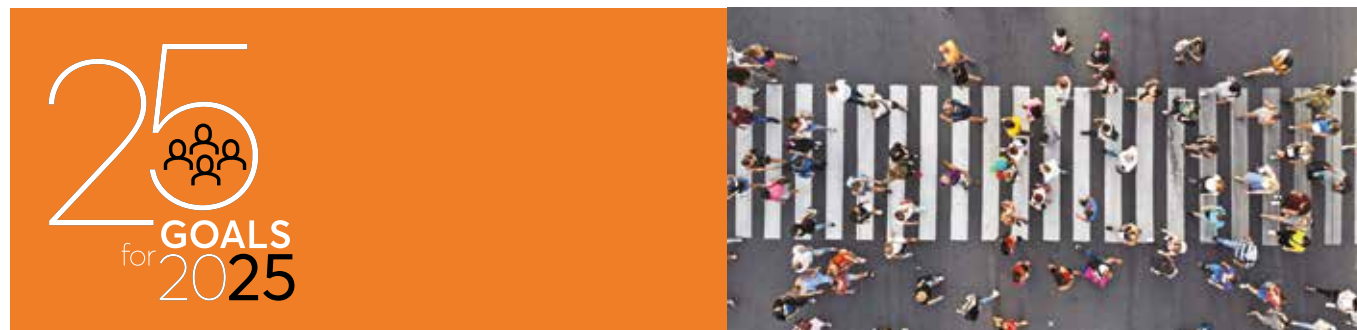
Environment

Recycling of waste 50% increase in collection points in offices.	The goal was not met due to COVID-19. The program will be completed in 2021.	
Climatic Neutral WIND store Certification.	The goal was achieved. The store in Kifissia became the 1st climate neutral store in Greece.	
Energy Checks 100% of the facilities.	The goal was achieved. We received ISO50001 (Energy Management System) certification in all buildings.	
WIND Digital Services 15% increase in subscribers.	The goal was surpassed and reached 33.88% of registered subscribers.	
Energy Efficiency 5% increase in building facilities.	The goal was surpassed and reached 20%.	

New Sustainable Development Strategy: 25 Goals for 2025

The 25 goals that we will implement within the next 5 years are fully integrated in the operation of our Company. It is an ambitious human centric and environmental action plan and is a continuation of the previous 5-year program.

The new sustainable development strategy “25 Goals for 2025” is based on the ESG criteria (Environmental - Social - Governance) and international standards for sustainable development (GRI, SASB). Our sustainability strategy is in full alignment with the European Green Agreement on Climate Neutrality by 2050 and with the Sustainable Development Goals (SDGs) by the United Nations for 2030.



SOCIAL

Customers

- ▶ Customer Satisfaction (CSAT) ≥ 80%.
- ▶ Digital connectivity for all. Continue Optical Fiber and 5G mobile networks deployment with an investment of €500 million with aim to cover 90% of the population by 2025.
- ▶ Keep consumers informed and engaged for 25 Goals for 2025.
- ▶ A digital network that promotes sustainability and the adoption of sustainable practices.
- ▶ Improved digital customer experience with integrated and secure communications services.

Society

- ▶ 50% increase awareness for kids@safety program.
- ▶ Provide digital access to the residents of remote areas with a view to ensuring equal participation in the digital future.
- ▶ Empower women on enhancing skills through partnerships and initiatives to achieve their goals.
- ▶ 400 hours of volunteering in social and environmental initiatives per year.

Employees

- ▶ Employee engagement at 75% (based on surveys).
- ▶ Flexible forms of work for 100% of employees.
- ▶ 100% participation and awareness of employees on sustainable development on an annual basis.
- ▶ Enhance and introduce new wellness programs.



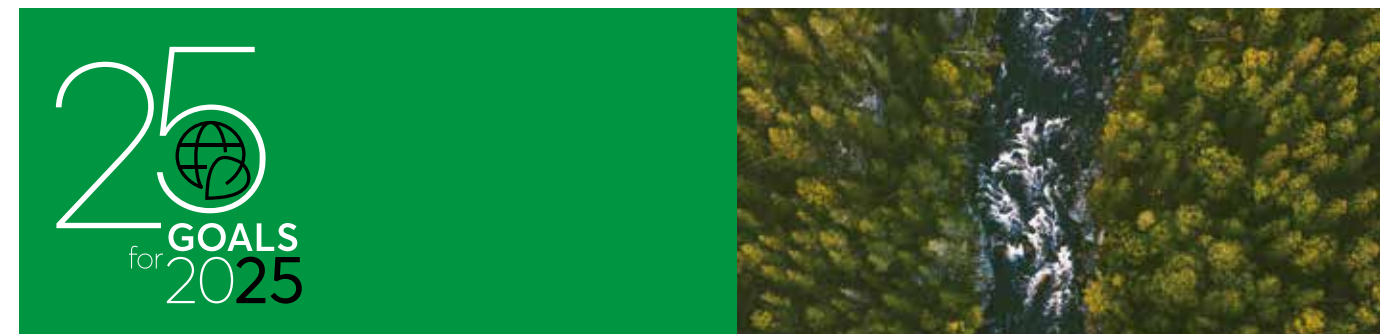
CORPORATE GOVERNANCE

Corporate Governance

- ▶ 35% of women in roles of responsibility.
- ▶ Conduct compliance checks on personal data protection and publish relevant data protection guidelines.
- ▶ Update the Supplier Code of Conduct and incorporate Sustainability Assessment Criteria.
- ▶ Participation of 100% of employees in updates on the WIND Code of Conduct.

Sustainable Operation

- ▶ Expenditure to domestic suppliers ≥ 90% of total.
- ▶ Compliance with SASB standards and other sustainability ratings.
- ▶ Use of 100% green electrical energy through Guarantees of Origin and reduction of emissions from energy production by 10%.
- ▶ 10% of WIND Stores to become Carbon Neutral.



ENVIRONMENTAL

- ▶ 100% separation and treatment of biowaste in offices.
- ▶ Reduction of energy consumption in base stations and data centers by more than 10%.
- ▶ Reduction of fleet vehicle emissions by using hybrid cars by at least 10%.
- ▶ Use of technological solutions for the protection of the environment and biodiversity of Greece.

Sustainable Development Governance

We recognize the importance of corporate governance principles in order to safeguard the interests of all those associated with the Company. We follow strict and high standards of corporate governance which ensures a balance between management, entrepreneurship and Company performance.

The high standards of corporate governance we follow ensure the objectivity of decisions, operational transparency, the Company's performance, and create long-term value for our employees, customers, shareholders, and suppliers.

Structure Of Sustainable Development Governance

Board of Directors

Responsible for planning and applying the Corporate Responsibility Strategy.

Corporate Affairs Department

The Director of Corporate Affairs is responsible for applying and promoting sustainability (ESG) issues.

Sustainability Working Group

It promotes the principles of Sustainability (ESG) within our Company and collects the data and prepares the Sustainability Report.

Sustainability Function

Develops corporate responsibility programs and actions, communicates with Stakeholders and coordinates the Sustainability Working Group for the issuance of the Sustainability Report.

Stakeholders

We constantly communicate and align with our stakeholders, who are determined based on their impact to our business operations. We have developed a specific approach for precisely mapping them, as well as our relationship with them. Our stakeholder either belong to the internal environment of the Organization (shareholders, employees, commercial network), or exist and act in the external environment, in Greece and/or internationally (regulatory authorities, media, local government, suppliers, partners, customers, central government, academic society, NGOs).

Stakeholders	Two-way Communication	Priorities - Dialogue Issues
Regulatory Authorities	Participation in consultations (5) Participation in studies (1) Participation in conferences (1)	Network Infrastructure & Investments, Regulatory Requirements Quality of Services & Service Market - Competition, Business Continuity Issues
NGOs/Citizen Organizations	Partnerships (4) Support (1) Meetings (2)	Education & Volunteerism, Health & Safety Environment Social Contribution
Central/Local Government Government	Meetings (5) Participation in local conferences/workshops (3)	Safe use of the Internet, E/M Radiation Economic Development, Environment Investments in Technology & Infrastructure Supporting the Local Economy, Society, Cultural & Educational Institutions
Customers (Individuals - Businesses)	Customer Satisfaction Surveys (2) Customer Service Center (1) Online Communication (1) Complaint Telephone Line (1)	Technical Issues for Products & Services Communication Coverage Quality of Services Telecommunications Charges, E/M Radiation
Academic Community	Support to Scientific Programs (2) Educational Seminars (5) Information Days (5)	E/M Radiation Safe use of the Mobile Phone and the Internet Education, Innovation, Health & Safety
Media	Press Conferences (2) Field Trips (3) Meetings (1) Press Releases and Presentations (1)	Management, Financial & Commercial Results, Regulatory Issues, Quality of Services and Network Coverage, Infrastructure, Technology & Innovation, Social Contribution, Environmental Operations
Suppliers	Working visits (4) Participation in Industry Associations (5) Ongoing Information and Support (1)	Procedural Matters Financial Matters Timely Delivery Safe delivery conditions for employees
Shareholders	Scheduled Shareholder Meetings (5) Targeted Communication (2)	Financial Growth/Results Management, Investment Plan Strategic Choices, Socio-economic Developments
Employees	Employee Opinion Surveys (4) Internal Communication (1) CRP AFR newsletter (1) Intranet (1) Organization of Events (3) Meetings with Employees Union (1)	Education Health & Safety Equal Opportunities for Professional Development
Commercial Network	Extranet (Communication Systems) (1) Business Conferences (3) Meetings with Sales Managers (2) Ongoing Information and Support (1)	Corporate Governance Sharing Knowledge and Best Practices Initiatives for supporting local community needs Training in New Products and Services Customer Service Recycling, Objectives and Ecological Awareness

We approach important issues responsibly

Materiality analysis

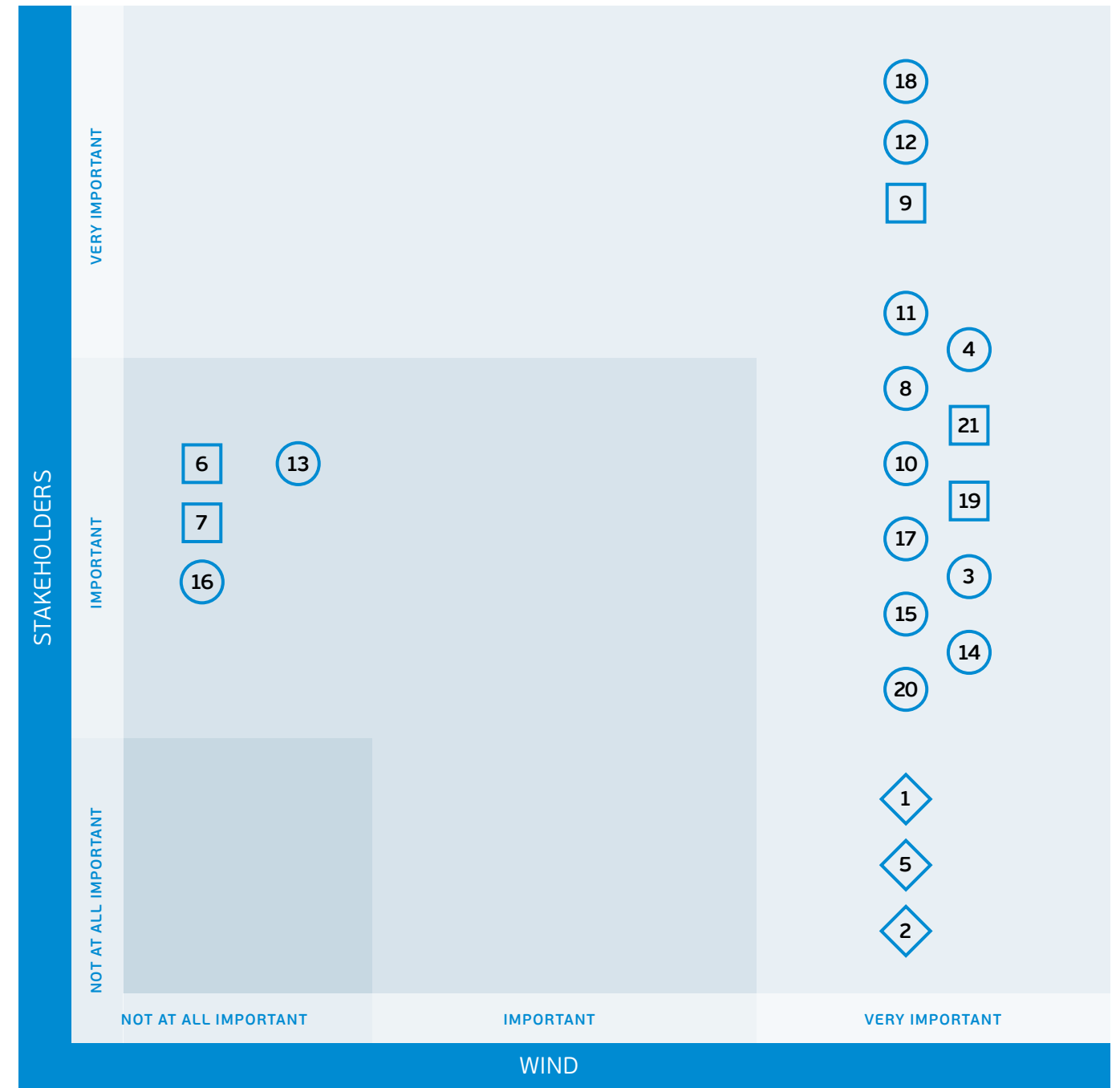
One of the most important and fundamental guiding principles of GRI is the concept of materiality. An organization should address issues that cause the greatest significant economic, environmental and social impact, or those that are considered more significant by its internal and external Stakeholders. In the process of identifying the significant issues, an organization should actively involve its Stakeholders and address all issues raised in a given time period, which fall within the limits of the organization's exposure.

Identifying the material issues

For the years 2019 and 2020, the material issues for WIND Hellas were reported through an electronic questionnaire administered to its main Stakeholders (employees, customers, suppliers, local community representatives, NGO representatives, SME representatives and shareholders) and the Company. After the above data were collected, the following significant issues emerged:



- ▶ Protection of personal data
- ▶ Employee health & safety
- ▶ Environmental legislation
- ▶ Social benefits of employees
- ▶ Competition legislation
- ▶ Waste management
- ▶ Network investments
- ▶ Electromagnetic radiation
- ▶ Safe use of new technologies
- ▶ Confidentiality of communication
- ▶ Anti-corruption
- ▶ Discrimination
- ▶ Diversity and equal opportunities
- ▶ Quality of services
- ▶ Indirect social impacts
- ▶ Profitability
- ▶ Procurement practices



□ ECONOMY

○ SOCIETY - EMPLOYEES - MARKET

◇ ECONOMY

- 1 Indirect social impacts
- 2 Procurement practices
- 3 Anti-corruption
- 4 Competition legislation
- 5 Profitability
- 6 Energy consumption
- 7 Emissions
- 8 Waste management
- 9 Environmental legislation
- 10 Electromagnetic radiation
- 11 Social benefits of employees

- 12 Employee health & safety
- 13 Employee training
- 14 Diversity and equal opportunities
- 15 Discrimination
- 16 Support of local communities
- 17 Confidentiality of communication
- 18 Protection of personal data
- 19 Safe use of new technologies
- 20 Quality of services
- 21 Network investments

04



**CORPORATE
GOVERNANCE**

We value transparency

Our way of operating is based in values and the trust and confidence we earn from our employees, customers and shareholders. We adhere to our commitments, display honesty and integrity and reach company goals solely through honorable conduct.

Our Approach

We proceeded in 2019 and 2020 with careful planning of our work, through responsible administrative practices, inspections and evaluation of our daily operation.

Responsible management

Our commitment is to make WIND Hellas one of the best independent telecom companies in Europe, offering to our customers high quality services at the best price. Our corporate values support the implementation of our commitment, taking also into account our employees aspirations for a better work environment.

Integrity

Do the right thing, regardless of cost, with integrity and fairness for all.

Simplicity

Put aside anything unnecessary and keep the essence of everything I do.

Flexibility

Adapt quickly and effectively to the challenges of the market.

Entrepreneurship

Constantly seek to achieve excellent performance in my work. I take the responsibility and I am proud of it.

Teamwork

Actively and positively support the team. I help so that everyone's potentials are highlighted and exploited.

Our policies

Our strategy is based on our vision of "doing the right thing". In order to ensure that we carry out our business activities with respect and accountability, we have developed policies aimed at providing high quality products and services to our customers, ensuring the protection of their personal data and the confidentiality of telecommunications and the protection of the environment. Our policies can be found on the official website www.wind.gr, on the WIND intranet for employees, on the WIND extranet for our stores, and in paper form in the workplace.

Quality policy

Describes the commitment and values of the Company, which are applied throughout its operations.

Environmental policy

Describes our commitment regarding environmental protection.

Data security policy for the protection of privacy of communications

Is applied internally and imposes in our contractual relations with third parties, the security policy to ensure the confidentiality of communications.

Business continuity management policy

Describes our commitment in relation to our ability to continue to provide services to our customers in an unin-

errupted way, in case of an event which could negatively impact business units, systems, and services.

Work health & safety policy

Describes our commitment to ensuring the health and safety of our employees.

Privacy policy

Describes the terms and conditions maintained by the Company for the protection of the privacy of subscribers, users of its websites and applications (apps), as well as employees. It ensures the high level of the services offered, respecting the current legal framework of the General Data Protection Regulation (GDPR).

Management practices

WIND Hellas is a Societe Anonyme. In accordance with its Articles of Association, the supreme body of the Company is the General Meeting of Shareholders, which may take decisions on any matter pertaining to the Company.

Board of Directors

The management and representation of the Company and the management of its assets falls under the authority of the Board of Directors, which may consist of three (3) to fifteen (15) members.

The current Board of Directors (BoD) of the Company consists of the Chairman and two members. The Chairman of the Board of Directors also acts as CEO. The BoD members take part in its regular meetings and jointly decide on the items on the agenda.

All members of the Board of Directors have been recruited from Greece.

Composition of the Board of Directors 2019 and 2020

In 2019, the BoD was comprised of the following members:

- ▶ Athanasios Zarkalis, Chairman and CEO
- ▶ Georgios Rallis, Member
- ▶ Nikolaos Kostaras, Member

The composition of the Board of Directors as of October 2020 was as follows:

- ▶ Athanasios Zarkalis, Chairman and CEO
- ▶ Nikolaos Babalis, Member
- ▶ Nikolaos Panopoulos, Member

Contacting the Management

In order to decide on a strategy for realizing the Company's investment plan, we communicate with the shareholders at regular time periods, with the aim of informing them directly about all new developments in the Company and the Greek market in general. The constructive two-way communication between the employees and the Board of Directors continues. During the year, briefing meetings are held on a regular basis between the heads of departments and groups and between each supervisor and his/her work team, so that all employees are aware of the Company's objectives, strategic priorities and results.

Committees

The work of the Board of Directors is supported through the establishment of specific committees.

Executive Management Committee

The Executive Management Committee consists of the CEO and the Chief Officers, responsible to decide on day-to-day Company matters. It reaches important decisions with respect to daily operations and the Company's overall supervision, dealing with problems that may arise and

drafting individual strategies, always consistently with the decisions of the Company's Board of Directors and its shareholders.

Executive Compliance Committee

The main aim of the Executive Compliance Committee is to monitor the Compliance Management System. It deals with compliance issues affecting internal and external functions of the Company with respect to its principles and values, the implementation of the Code of Conduct as well as issues of corporate governance. It consists of the CEO, the Information Technology and Transformation Manager, the Legal Adviser, the Chief Commercial Officer and the Internal Audit & Compliance Officer.

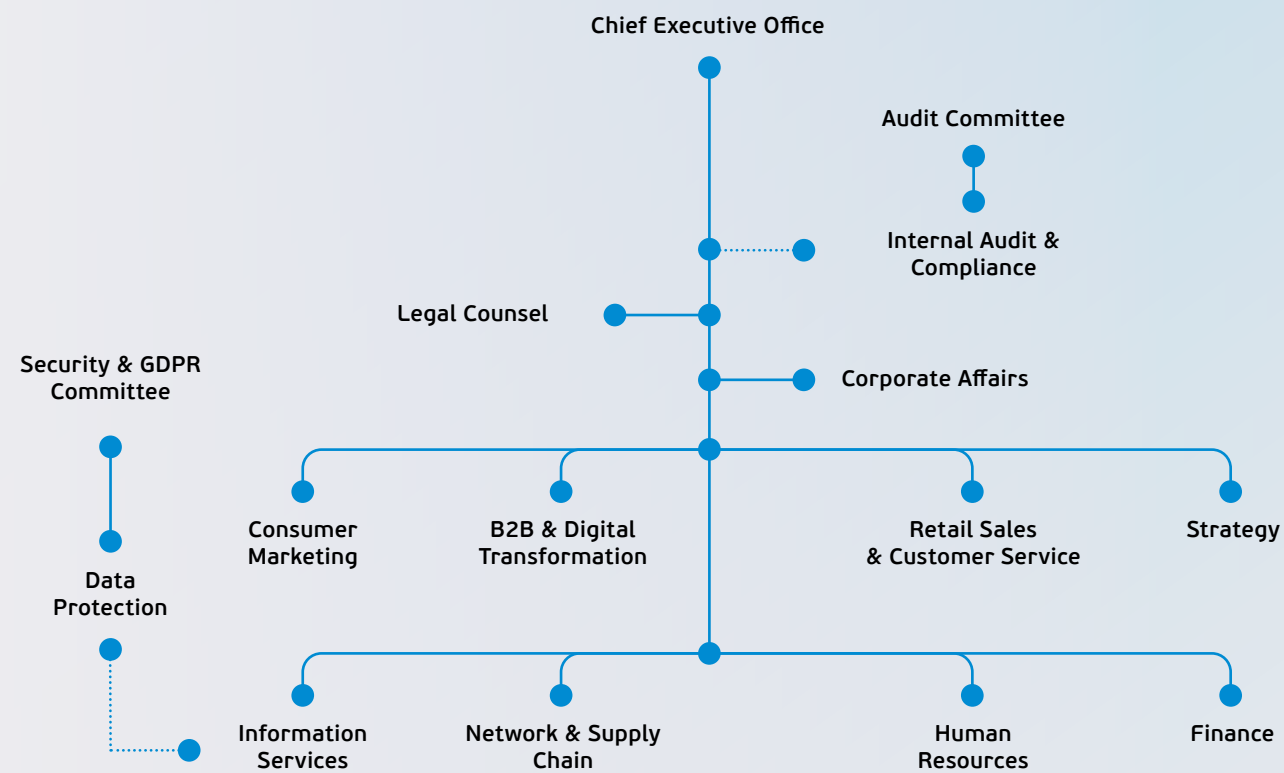
Information Security & Data Protection Committee

The Information Security Committee meets at regular intervals aiming at the creation of a corporate information security policy and its implementation by the employees, in order to ensure security, confidentiality and integrity of information. The Committee is the central body of the Company that manages the information security policy and may propose corrective actions aimed at maintaining and strengthening the information security audit mechanism through the procedures and systems of the Company. The Committee is comprised of the CEO, the Information Technology and Transformation Officer, the Chief Network and Supply Chain Officer, the Senior Executive Corporate Affairs, the Information Security and Protection of Personal Data Officer, the Protection of Personal Data Manager and the Internal Audit & Compliance Officer.

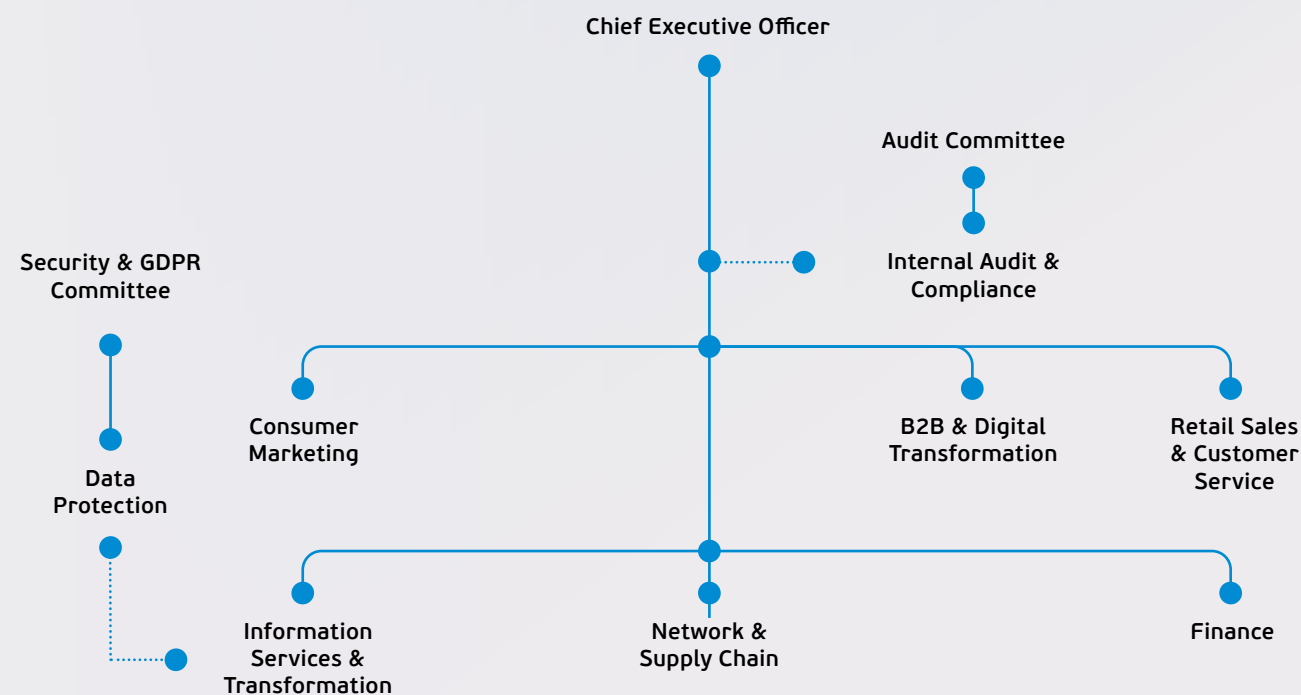
Investments Committee

The Investments Committee is a permanent committee of the Management Team of WIND Hellas. The Committee is responsible for the prior assessment and approval or rejection of all major capital expenditures and investments of WIND Hellas, with the exception of financial investments. The Committee meets 2 times a month and is comprised of the CEO, the Chief Financial Officer, the Chief Information Technology Officer, the Chief Corporate Customers and Digital Transformation Officer, the Chief Network and Supply Chain Officer, and the Information Technology and Transformation Officer.

Organizational Structure 2019



Organizational Structure 2020



Internal audit & Audit Committee

The Internal Audit & Compliance Division is responsible to provide reasonable independent assurance to the Board of Directors of the parent Company that the internal audit system ensures compliance with Company policies, practices and procedures. This is accomplished by assessing the effectiveness of risk management systems, controls and governance practices.

Management is responsible for designing and operating the internal audit system, while line managers are responsible for establishing the appropriate policies and procedures in order to assist the Company in achieving its predetermined objectives. Through the Audit Committee, which consists of at least 3 members, the organizational independence of the Internal Audit & Compliance Division is achieved, since the Committee reports directly to the Board of Directors of the parent Company. The Audit Committee assesses and supports the work of the Management, ensures the sufficiency of human and technical resources and the unhindered access to information related to the audits. The Committee is convened at least 4 times annually and is informed about any audit findings and recommended corrective actions, monitoring their progress over time.

Code of Conduct

The WIND Hellas Code of Conduct is based on 5 interrelated pillars.

Values

The code is based on the Company's values, with particular emphasis on integrity and the quote "do the right thing regardless of cost".

Tone at the Top

Continuous support in all its forms by the senior and executive management.

Ongoing Debate

Issues related to the implementation or compliance with the code are part of the meetings at departmental level. Continuous training on general or specific issues.

Freedom of choice

Introduction of hotlines for all employees, encouraging reports on unethical practices issues.

Corporate Culture

Establishment of a uniform corporate culture which shall make the code part of our everyday behavior.

The Code of Conduct of WIND Hellas provides the framework of the basic operating principles that guide our daily business behavior.

The Code of Conduct sets out the relationships both among our employees and any third party they contact in the context of their work. At the same time, we have developed communication channels for named or anonymous complaints of breaches of the code. Complaints can be made either online through the e-mail address codeofconduct@WIND.gr or by post.

The main actions under the Code of Conduct were:

The implementation of ISO 19600 in the Compliance System

We have been implementing the ISO 19600 Compliance Management System since 2016, which is not authenticated. This standard provides a framework for the implementation of compliance and guidance requirements for the creation, development, implementation, evaluation, maintenance and improvement of an effective and responsive compliance management system.

On this basis we have developed and implemented the “Regulatory Compliance Framework” adapted to the operation and activity of WIND Hellas.

The Code of Conduct is supported by the following policies, which are accessible by all Company employees:

Regulatory Compliance Framework

It supports the achievement of the regulatory compliance objectives of the Company, setting a compliance framework that encourages the implementation of WIND Hellas activities in accordance with the legal and internal requirements.

Conflict of interest policy:

The purpose of this policy is to describe the principles we have adopted in regard to the management and monitoring of actual and potential conflict of interest.

Gift acceptance policy

The purpose of this policy is to describe the basic principles of conduct to be followed in the case that gifts, entertainment, promotions or any other form of benefits are offered, in order to avoid situations that either pose or may pose a risk and question the independence, impartiality or integrity of our employees' judgment.

Fraud response policy with main directions

The purposes of the policy are as follows

- ▶ Awareness of our employees regarding the meaning and prevention of fraud;
- ▶ Guidance for what they have to do in case they become aware of similar cases or suspect that similar acts are committed, in order to form a single operational behavior and culture on how to prevent and deal with them;
- ▶ Description and definition of the relevant actions that must be taken by the competent bodies in cases of a fraud incident;
- ▶ Facilitating the development of systems, procedures and control mechanisms that help to prevent and combat fraud.

Anti-corruption policy with main directions

- ▶ Describing the requirements of WIND Hellas to achieve compliance with applicable anti-corruption legislation.
- ▶ Guiding employees and associates as to how to behave.
- ▶ Compliance of WIND Hellas and its employees with the applicable laws. Violation of such laws entails severe civil and criminal penalties for the Company and its employees, along with heavy fines and even imprisonment.

For 2019-2020, no incidents of corruption have been reported on the Whistleblowing communication channel or directly on the Head of Regulatory Compliance and Internal Audit of the Company.

Non-retribution policy

The purpose of the policy is to define the protection afforded by WIND Hellas against any adverse impact on employees who, in good faith, report behaviors that are inconsistent with the Code of Conduct and/or the law.

With the aim of strengthening corporate culture and better assimilating the ethical rules of the Code of Conduct and regulatory compliance policies in order to safeguard customer information security, implement the principles of operational continuity, protect the environment and implement internal procedures and the Company's policies, a comprehensive training material was prepared in 2019 that includes all these topics, which was adapted to the specifications of the Company's distance learning system.

In 2020, distance learning was introduced for all employees of the Company, covering 70% of the staff by the end of the year.



Management systems & certifications

In the Company we have developed, implemented and certified the following management systems:

- ▶ Quality management system
- ▶ Environmental management system
- ▶ Occupational health and safety management system
- ▶ Energy management system
- ▶ Social security - business continuity management system

Quality management

We apply a quality management system that covers all our facilities and its scope of application includes:

- ▶ Design, development, provision, sales, billing and support of comprehensive telecommunications products and services (mobile and fixed telephony, data, internet and broadband) for private and corporate customers.
- ▶ Design, development, implementation, operation, support and maintenance of telecommunications and IT infrastructure, telecommunications and data networks, IT systems and applications.
- ▶ Design, development, monitoring, control and support of the WIND chain of stores.
- ▶ The application of the quality management system includes:
 - Sales of mobile and fixed telephony and internet (WIND Mobile, Q Prepaid, WIND Fixed Telephony and Internet).
 - Retail sales of mobile and fixed telephony devices, electronic equipment and accessories.
 - Repair of mobile telephony devices.
 - After sale service for private and corporate customers.

The Quality Management System we apply is certified in accordance with the requirements of the following international standards.

Quality: EN ISO9001: 2015

- ▶ Initial certification: 2001
- Certificate Registration No. 44100011460
- ▶ Last certification renewal: 2020
- Certification Body: TUV Hellas (TUV Nord Group)

Environment and energy

We implement an environmental management system in all our activities. Its scope covers the following:

- ▶ Design, development, provision, sales, billing and support of comprehensive telecommunications products and services (mobile and fixed telephony, data, internet and broadband) for private and corporate customers.
- ▶ Design, development, implementation, operation, support and maintenance of telecommunications and IT infrastructure, telecommunications and data networks, IT systems and applications.
- ▶ Design, development, monitoring, control and support of the WIND chain of stores.
- ▶ The application of the system in WIND stores includes:
 - Sales of mobile and fixed telephony and internet (WIND Mobile, Q Prepaid, WIND Fixed Telephony and Internet).
 - Retail sales of mobile and fixed telephony devices, electronic equipment and accessories.
 - Repair of mobile telephony devices.
 - After sale service for private and corporate customers.

The Environmental Management System complies with the international standard ISO14001.

Environment: EN ISO14001: 2015

- ▶ Initial certification: 2009
 - Certificate Registration No. 44104090360-000
 - ▶ Last certification renewal: 2020
 - Certification Body: TUV Hellas (TUV Nord Group)
- In addition, we also apply an ISO50001 Energy Management System to our energy-intensive facilities, with a certification scope covering the operation of data and switching centers and management offices.



Energy: ELOT EN ISO50001: 2011

- ▶ Initial certification: 2019
- Certificate Registration No. 058190003
- Certification Body: TUV Hellas (TUV Nord Group)

Occupational Health and Safety

We apply an Occupational Health and Safety Management System, the scope of which includes:

- ▶ Design, development, provision, sales and support of comprehensive telecommunications products and services (mobile and fixed telephony, data, internet and broadband) for private and corporate customers.
- ▶ Design, development, implementation, operation, support and maintenance of telecommunications and IT infrastructure, telecommunications and data networks, IT systems and applications.
- ▶ Design, development, monitoring, control and support of the WIND chain of stores.
- ▶ After Sale Service for Private and Corporate Customers.

Occupational Health and Safety: BS OHSAS 18001:2007

- ▶ Initial certification: 2017
- Certificate Registration No. 4411617370062
- ▶ Last certification renewal: 2020
- Certification Body: TUV Hellas (TUV Nord Group)

Business Continuity Management

We apply the Social Security Business Continuity Management System, which covers all the Company's facilities and its scope includes:

- ▶ Design, development, provision, sales and support of comprehensive telecommunications products and services (mobile and fixed telephony, data, internet and broadband) for private and corporate customers.

- ▶ Design, development, implementation, operation, support and maintenance of telecommunications and IT infrastructure, telecommunications and data networks, IT systems and applications. The Social Security Business Continuity Management System that we apply was certified in 2017 in accordance with the requirements of the following international standard.

Business Continuity: EN ISO22301:2012

- ▶ Initial certification: 2017
- ▶ Re-certification: 2020

Certificate Registration No. 054170001
 Certification Body: TUV Hellas (TUV Nord Group)
 At the same time, we are fully compliant with the requirements arising from the Regulatory Authorities GG 305/14-2-2012 (EETT: Decision No. 7560/153) and 1742/15- 7-2013 (ADAE: Decision No. 205/2013) as amended by ADAE decision No. 99/2017.

Crisis Management Process

Following the internal audit proposal, in 2019 we prepared a comprehensive Crisis Management Plan (WHC-MP) that provides the management structure, the basic responsibilities and general procedures to be followed before, during and immediately after a crisis.



05

SOCIETY

We believe in giving back to the society

At WIND Hellas, our goal is to create value for people, society and the environment. For more than 10 years, we have consistently implemented a set of social initiatives. In 2019 and 2020, we supported innovative ideas, education and inspired in our fellow human beings - employees, customers and citizens - social solidarity and environmental consciousness.

10 years Kids@Safety

For 10 years we have been guiding children to adopt a safe online behavior and helping them to become responsible digital citizens of tomorrow.



The Kids@Safety program, which has been running for ten years, aims at a safe online environment for children and lays the foundations for the responsible digital citizens of tomorrow. It helps parents and their guardians prepare and guide their children to adopt a safe online behavior and be trained to learn to recognize and avoid potential risks. By providing advice on the proper use of the Internet and encouraging dialogue between minors, parents, guardians and teachers, the program also promotes the positive aspects of new technologies and critical thinking. The main focus of the program is the WIND Hellas program website www.kidsatsafety.gr and the communication channels of Facebook, Instagram and Twitter.

The program has been launched in cooperation with the Hellenic Police and the Cybercrime Division. Since 2011, WIND Hellas has been actively supporting Cyberkid as an exclusive sponsor of the mobile application CYBERKID and the website www.cyberkid.gr. The mobile application CYBERKID enables children through the SOS - Cyber Alert Line to communicate directly (touchscreen call), in real time, in case of danger or threat with officers of the Op-

erations Center for Internet Threats of the Cybercrime Division.

In 2019, Kids@Safety supported the CSI Institute (Cyber Security International Institute) for the second year in a row, in an innovative online parenting project. This was the Digital Parents Academy, a free 8-hour interactive training program.

We are together

Free emergency communication services

In our effort to contribute to dealing with emergencies, we offered free telecommunication services to our subscribers in areas (Chania, Rethymno, Chalkidiki, Evia, Zakynthos, Kefalonia, Ithaca, Karditsa, Samos and Volos) which were severely damaged by extreme weather or fires, while at the same time, the National Network Management Center and its technicians worked intensively to restore the damages to the mobile network as well as to the fixed and internet network.

COVID-19

In the last year, due to the special circumstances caused by COVID-19, WIND Hellas, guided by a sense of responsibility and solidarity with the society and its subscribers, carried out a series of actions to ensure unhindered connectivity for its customers, and also to serve the needs of society.

More specifically:

We offered free communication to our subscribers, whether individuals or businesses, giving priority to those who were experiencing hardship. Indicatively, we supported the vendors and partners of the street magazine SHEDIA.

We supported the Hellenic Coast Guard and the public sector of Greece:

- ▶ **By providing free Wi-Fi services at Pammakaristos Hospital and in all the buildings of "Sotiria" Hospital**, facilitating the doctors, nursing and administrative staff and patients in their communication.
- ▶ As an exclusive telecommunications provider we support the work of the National Public Health Agency (EODY), covering the communication and equipment needs of the mobile units of the Ministry of Health that perform COVID-19 detection tests nationwide. In addition, we support EODY's new initiative to launch the new support center in Maroussi, providing fixed telephony services.
- ▶ **We supported the 10 nurses from Crete** who responded to the call for help and went to Thessaloniki to offer their services, and rewarded them for their work by offering free calls and internet use for them to communicate with their friends and relatives during their absence.
- ▶ We met the communication needs of the ten new Rafnar 1100 type, high-speed special mission vessels of the Hellenic Coast Guard, by offering free unlimited data via the mobile network of WIND Hellas.



We supported the equal and unhindered access of the country's students and teachers to distance learning:

- ▶ We offered to the school community of the remote island of Anafi free connection to the network of WIND Hellas, while the 18 6-17 years old children of the structure of the Ark of the World in Kalamata attended their lessons every day with free technological equipment and services from WIND Hellas.
- ▶ **We responded to the initiative of the Ministry of Education and Religious Affairs and granted zero-rating access from mobile networks, to digital platforms used by the Ministry for distance education in schools.**

We offered free written messages (SMS) to our subscribers, regardless of financial plan, to the 13033 line of the General Secretariat for Civil Protection, to the 10306 Psychological Support line of University of Athens and to the 1110 line of the Region of Attica.



We offer our expertise and solutions to protect the environment:

- ▶ We contribute to the protection of the environment and the Greek fauna. The Balkan chamois is among the most endangered animals in Greece. WIND Hellas, with the aim of protecting the species, is leveraging its network and know-how to protect the environment and the Greek fauna of North Pindos Park.
- ▶ We protect the forests of Attica. For 2 consecutive years, we supported the Forest Fire Protection Volunteers of Attica (EDASA), covering their telecommunication needs through its mobile network, for the entire fire-fighting period.

We have activated the solidarity action “#stay home and we will bring you everything you need” in Athens and Thessaloniki.

Giving priority to the health and safety of vulnerable groups, WIND Hellas undertook, during the period of the first quarantine, the initiative to transport free essentials to their homes so that they would not be exposed to the virus.



Donation of technological equipment and furniture by WIND Hellas.

Following the relocation and renovation of our offices in Athens and Paiania, WIND Hellas donated technological equipment and furniture to schools, hospitals, municipalities and other organizations. A total of 396 pieces of furniture, such as closets, cabinets, tables, desks and chairs, 9 computers and 6 servers, have been distributed during 2020 to organizations and bodies in need.

tution that organized the charitable event, without any deduction. The amount collected in 2020 through the “I Offer” service for various organizations was €4,750 (excluding VAT).

▶ SOS Children’s Villages

Our subscribers are able to donate €2.016 to the SOS Children’s Villages by calling the number 14567 or sending an SMS to the number 19820. WIND’s subscribers contributed €3,416 in 2019 and €1,422.81 in 2020 to SOS Children’s Villages (excluding VAT).

Social Product

At WIND Hellas we believe that technology can help vulnerable social groups. By acting on our beliefs, we contribute to covering their telecommunications needs aiming to reduce social isolation.

Support Lines

▶ I Offer

This is a joint charitable initiative of the three mobile telecommunications operators in Greece, which began in February 2006. The service involves the activation of a common 5-digit number for a specific period of time; during which mobile subscribers are able to send as many SMS they wish (at a cost of €1 plus VAT). Thus, they are able to support a non-profit NGO every time they do so. In 2020 the service was activated 14 times. The total net revenue (excluding VAT) generated from the use of the service is given to the eligible organization or insti-

▶ The Smile of the Child

Our subscribers are able to donate €2 to the “The Smile of the Child” by sending SMS to the number 19810. In 2019, €29,089 was paid through the contribution of WIND Hellas subscribers, while in 2020 € 21,654.25 was paid to The Smile of the Child (excluding VAT).

▶ Arc of the World

Our subscribers can donate €2 or €2.016 to the Arc of the World by sending SMS to 19888 or 19828 respectively. A total of €17,791.98 was allocated in 2019 and €12,246.61 in 2020 through the contribution of our subscribers (excluding VAT) to the Ark of the World.

▶ Theophilos

Our subscribers are able to donate €2,016 to the NGO “Theophilos” by sending SMS to the number 19855. In 2019 and 2020, €457.22 and €70.28 were donated respectively through the contribution of our subscribers (excluding VAT).

▶ ELEPAP

Our subscribers are able to donate €2 to ELEPAP by sending SMS to the number 54980 or 19811. Overall, €1,096.5 was paid in 2019 and €754.8 in 2020.

▶ Agkalia

Our subscribers are able to donate €2 to the NGO “AGKALIA” by sending SMS to the number 19829. Our subscribers contributed €113.9 in 2019 and €40.8 in 2020 (excluding VAT).

▶ Lampsi

Our subscribers are able to donate €2.016 to the NGO “Lampsi” by sending SMS to the number 19833. Our subscribers contributed €72.01 in 2019 and €80.57 in 2020 (excluding VAT).

▶ Asylon Aniaton

Our subscribers are able to donate €2.016 to the Asylon Aniaton by sending SMS to the number 19809. Our subscribers contributed €248.57 in 2019 and €6.86 in 2020 (excluding VAT).

▶ Make a Wish

Our subscribers are able to donate €2 to “Make a Wish” by sending SMS to the number 19808. Our subscribers contributed €936.7 in 2019 and €1,123.7 in 2020 (excluding VAT).

▶ Together for Children

Our subscribers are able to donate €2.016 to the association “Together for Children” by sending SMS to the number 19805. Our subscribers contributed €1,225.71 in 2019 and €1,097.13 in 2020 (excluding VAT).

▶ Oloi Mazi Boroume

Our subscribers are able to donate €2.016 to the association “Oloi Mazi Boroume” by calling or sending SMS to the number 19817. In 2020, €10,256.73 were contributed by WIND Hellas subscribers.

Help Lines

▶ “Amber Alert Hellas ”

Through our telecommunications network throughout Greece, our customers are able to participate actively in the process of locating either a missing or abducted child via SMS to 1056 from their mobile.

▶ “European help line for children ”

We support the European help line for children 116000, through which cases of missing children can be easily and quickly reported for free or through which assistance for children in need can be arranged. The 116000 number now also functions for sending free SMS messages.

Emergency Lines

Through our network, we provide our subscribers the option of free calls to emergency numbers such as 100, 166, 199, 112, 197 and 108, even in case of barriers due to debts. The numbers quoted are free of charge, under the National Numbering Plan and the relevant regulatory framework.



06

OUR PEOPLE

At WIND Hellas, people set the pace!

Our people are the driving force for the development and growth of WIND. We believe in the uniqueness of each one of them and constantly invest in their development and training. We are a responsible employer who ensures a great working environment and competitive benefits and reward development and dedication, that bring results for overall corporate success.

Our Approach

The socially responsible action of the Company contributes significantly to its relationship with its people, as confirmed by our biannual survey of employees' views. In this survey, 9 out of 10 of the employees of WIND Hellas declared their satisfaction with the way in which the Company creates value in society.

Employees participate in the full range of social responsibility and voluntary action programs. At the same time, it is also our responsibility to incorporate new initiatives that concern our employees, focusing on actions that support employment, development, progress, care and social responsibility.

In 2019 we undertook the following actions:

- ▶ Design of internal programs to reinforce employee commitment.
- ▶ Provision of new digital tools that enhance teamwork and efficiency.
- ▶ Increase of reward incentives and retention of talent.
- ▶ Strengthening talent retention and diversity.
- ▶ Enhancing WIND Flexy Work with an emphasis on innovation, technology and focus on results.
- ▶ Strengthening the EVIND internal activity and wellness program with new activities.

2020 was a year that started dynamically but was affected by the pandemic. We acted proactively to address the pandemic and its challenges by undertaking the following measures:

- ▶ Timely creation of an integrated action plan to protect our people.
- ▶ Acceleration of digital transformation within the Company, by undertaking a technological upgrade at all levels.
- ▶ Enhancing internal communication.
- ▶ Investing in the "upskilling" and "reskilling" of our employees.
- ▶ Strengthening brain re-gain by recruiting Greek professionals who worked and had careers abroad.

Action plan to protect our people against COVID-19

Our priority is to protect the health of our people and to contribute to the battle against the spread of the pandemic. WIND Hellas responded promptly and effectively to the challenges brought about by the pandemic in 2020 with an integrated action plan, introducing specifically:

- ▶ Teleworking for more than 90% of employees during peaks of the pandemic. Corresponding adjustment and percentage return to the office during the pandemic wave recession periods of up to 50% of employees, to ensure balance and connection of the groups both in practical matters and at a human level, with emphasis on stimulating positive psychology and thinking. Similar measures were also taken for the employees in our cooperating call centers.
- ▶ Business travel ground to a halt at the onset of the COVID-19 pandemic with meetings, summits, conferences and other events moving online.
- ▶ Continuous disposal of all necessary personal protective equipment and consumables with special care for critical infrastructures (masks, antiseptics, etc.).
- ▶ Modification of internal operation rules in public spaces (e.g. kitchens, restaurants, elevators).
- ▶ Temperature screening at the entrances of our buildings and intensification of third party entry control regulations.
- ▶ Special agreement with diagnostic centers to perform COVID tests for employees and their families.
- ▶ Regular disinfection and cloud spraying in the premises.
- ▶ Renewal of the Risk Assessment Study of the facilities and preparation of a case management protocol.
- ▶ Intensification and adaptation of site cleaning instructions, in collaboration with the Occupational Physician, irrespective of the presence of employees.
- ▶ Modification of ventilation systems, intensification of maintenance measures and maintenance of open windows.
- ▶ Complete harmonization and adaptation of every emergency instruction by the State and the competent authorities. Establishment of a dedicated "Help Line" to

provide support in issues related to work certificates, special purpose licenses, COVID tests, etc. Continuation of actions such as the distribution of Christmas gifts to employees, taking all safety measures.

- ▶ Launch of a short survey on the effectiveness of measures with 9 out of 10 employees positively assessing crisis management and stating that they "feel safe". Special design and care for the operation of WIND

stores, with reduced hours, exclusively for services where customers presence was required. (e.g. identification of personal data).

- ▶ Installation of a special glass divider at the work station (cash register), provision of the necessary personal protection equipment and supervision to ensure that the maximum number of persons in each store is complied with.

Human Resources Data

At WIND Hellas, our ongoing goal is to attract, retain and develop professionals. Here, excellent professionals, with talent and passion for learning, give their best every day and leave their mark in the dynamic field of telecommunications and technology, through their work. In 2019, we contributed significantly to the strengthening of the economy of Greece, employing 878 employees, while in 2020 we employed 875.

Employee distribution by department			
Department	Total employees		
	2018	2019	2020
General Directorate Administrative Departments	75	78	84
Consumption Marketing	79	73	75
Retail Sales And Customer Service	192	162	165
Corporate Customers And Digital Transformation	125	141	131
Network	233	213	187
Information Technology	130	127	147
Financial Department	86	84	86
Grand Total	920	878	875



Employee distribution by department and gender 2018 - 2020							
		2018		2019		2020	
Department	Gender	Ap.	%	Ap.	%	Ap.	%
General Directorate Administrative Departments	Female	40	53%	45	58%	48	57%
	Male	35	47%	33	42%	36	43%
Total		75		78		84	
Consumption Marketing	Female	44	56%	40	55%	41	55%
	Male	35	44%	33	45%	34	45%
Total		79		73		75	
Retail Sales And Customer Service	Female	125	65%	99	61%	106	64%
	Male	67	35%	63	39%	59	36%
Total		192		162		165	
Corporate Customers And Digital Transformation	Female	61	49%	64	45%	59	45%
	Male	64	51%	77	55%	72	55%
Total		125		141		131	
Network	Female	54	23%	48	23%	28	15%
	Male	179	77%	165	77%	159	85%
Total		233		213		187	
Information Technology	Female	34	26%	33	26%	40	27%
	Male	96	74%	94	74%	107	73%
Total		130		127		147	
Financial Department	Female	53	62%	52	62%	51	59%
	Male	33	38%	32	38%	35	41%
Total		86		84		86	
Grand Total		920		878		875	

Employee academic level	2018	2019	2020
Post-graduate degree holders (including PhDs)	35%	35%	35%
University degree holders	37%	37%	37%
Technical diplomas holders	28%	28%	28%

For the year 2019, 99.1% of employees are employed under permanent employment contracts (of which 0.2% are employed under part-time employment contracts), while for 2020, the rate was 98.74%. The remaining 0.9% of employees are employed under specific term employment contracts. In 2019, we made 95 new hires, of which 5 were for the region (Thessaloniki, Larissa and Patras), while in 2020 we made 88 new hires. The "open" positions at our Company are posted on our website www.wind.gr/career as well as on job search websites.

Employee distribution by age	For 2018	For 2019	For 2020
<=35	216	181	183
36-45	509	475	442
46-55	186	210	238
>55	9	12	12
Grand Total	920	878	875

An equal work environment that respects diversity

Human Rights & Equal Opportunities

We fully respect and adhere to the international provisions on human rights. We are committed that our human resources do not include minors and there is no forced labor. At the same time, we are promoting an environment of equal opportunities for all:

- ▶ We provide equal opportunities for development and reward based on employee performance and free of racial or other discrimination.
- ▶ We implement initiatives that empower employees and support them to operate in a safe environment for all, where they can express themselves freely and be creative.
- ▶ We discourage any form of harassment or other form of intimidation in the workplace and we have developed the "Report on Unethical Practices" process, to ensure that non ethical behavior is reported. In these two years, two incidents were recorded and were immediately investigated.

Freedom of Association

At WIND Hellas, we respect and protect the right of all employees to participate in unions and the existence of information mechanisms. In July 2007, the first Company's Collective Agreement (ESSE) was signed, with retroactive effect from October 2006. The latest renewal of the ESSE was in September 2011, while after its expiration it is applied voluntarily by the Company.

Internal Work Regulation

Our transparency and integrity in how we operate is reflected in the Internal Work Regulation we have drawn and apply. This regulation promotes ethical values, respect for laws and proper business practices and the creation of a suitable work environment. New employees are informed of the internal work regulation during onboarding on the day of their recruitment. Moreover, all employees have access to it through the WIND Hellas corporate Intranet.

Benefits

At WIND Hellas, we care for our people and ensure excellent working conditions, benefits and advantages, providing a comprehensive competitive benefits plan that rewards performance, skills development and overall corporate success.

New employees receive a detailed presentation of all benefits from the Human Resources. Also, all the information is posted on the WIND intranet. Employees are also informed by e-mail about all changes in the benefits plan.

Benefits Plan

Competitive - fixed and floating - remuneration plans that also take into account the evaluation by the employees themselves with the aim of contributing to a good work environment.

- ▶ Life insurance with disability - accident coverage.
- ▶ Group medical coverage plan with the participation of employees' families.
- ▶ Package for preventative checkup for all employees.
- ▶ Privileged use for all our products
- ▶ Access to the restaurant - cafeteria (at our facilities in Athens and Paiania) at reduced prices.
- ▶ Discounts and offers in all our product categories, as well as seasonal Bazaars with discounts of up to 90% on appliances and accessories, as well as products and services of partners and non-partners, of various kinds.
- ▶ Discounts on mobile, fixed telephony and bundle programs, mobile broadband, WIND VISION and prepaid offers, for us and our loved ones through the WIND Friends & Family plan.
- ▶ Discounts and special offers in shops and companies throughout Greece.

WIND Flexy Work

Giving priority to the people of WIND Hellas, we leveraged the possibilities offered by technology to provide the WIND Flexy Work program.

So, from July 2018 we have the possibility:

- ▶ to work from home or any other place we wish for up to 1 day a week; and
- ▶ to start our workday flexibly between 8:30 and 10:00 a.m.

In this way we enhance the efficiency, flexibility, empowerment and well-being of our employees.

Childcare costs

WIND Hellas offers to working parents who have children of pre-school age and until they are enrolled in primary education, an additional subsidy for the costs of a daycare center or babysitter, in the context of initiatives to encourage a care and empowerment environment for all.

Employee Health & Safety

Protecting the health and safety of our employees, visitors and partners is of outmost importance. Our goal is zero accidents and the constant improvement of the indices related to the workplace in the buildings where our employees work. The table summarizes the events over the past few years. In 2020, we lost an employee due to heart failure, while he was working from home.

	Employee losses	Number of accidents (absence > 1 day)	Number of accidents (absence > 3 days)	Total days of absence from work
2018	0	0	0	0
2019	0	1	2	60
2020	1	0	2	90

* The total days of absence include the working days of sick leave

** The number of accidents only includes those at work

To achieve our goals we use a systemic approach:

- ▶ Apply a certified occupational health and safety management system in accordance with OHSAS 18001.
- ▶ Identify, analyze and evaluate occupational hazards, including hazards resulting from the COVID-19 pandemic.
- ▶ Prepare Professional Risk Assessment Studies for each job, as well as safe work instructions.
- ▶ Make full use of experienced consultants - Safety Technicians and Occupational Physician. We investigate with them any accidents or incidents related to health and take measures to eliminate or reduce the relevant risks.
- ▶ Regularly monitor the quality of the working environment, by measuring all the necessary parameters such as dust, ventilation, lighting, volatile organic compounds, room temperature, humidity, drinking water quality, radiation, noise.
- ▶ Provide equipped clinics and/or pharmacies in every facility.
- ▶ Regularly inspect the premises and workstations for the timely detection of any non-compliances and new risks and we use the findings from the inspections to ensure our continuous improvement.
- ▶ Keep an open communication with the employees, so that they can submit their comments and suggestions for improvement at any time, by a simple email or even orally.

Finally, in order to prepare employees for emergency situations, we setup emergency teams and carry out evacuation exercises on our premises at regular intervals. These teams are trained on matters of firefighting and first aid, as well as on emergency procedures by the experts on each issue, the Fire Department and the Safety Officer/Occupational Physician.

Maternity leave

For 2019, the number of employees who were entitled to such leave was 22 and those who made use of the maternity leave are 22 (including those cases where the maternity leave started in 2018 and continued in 2019). In 2020, the number of the employees who were entitled to such leave was 23 and those who made use of the maternity leave were 23 (including those cases where the maternity leave started in 2019 and continued in 2020).

Human Resources Development Procedure Grow@WIND

Every employee at WIND Hellas is proud of the high performance and continuous growth that are the main components of our culture. The main tool for achieving them is Grow@WIND, designed in February 2013, by a cross-departmental team and used by each employee with their supervisor.

Grow@WIND's main axis is to align employees of WIND Hellas with our corporate strategy, sustainable development goals and values through the specific skills we seek to develop and constantly improve: achieving results, inspiration, active learning, focus on Customer experience, perception of the "big picture".

Grow@WIND is a 360° development process, consistently performed every year and hosted on the online platform me@WIND. Each Employee Development Plan results from Grow@WIND and is designed in collaboration with their supervisor, ensures that we all have growth opportunities according to our capabilities and the needs of the Company.

Employee Growth and Development

Our key priority is the continuous training of our employees so that they can be empowered and grow through equal training opportunities. In 2019, we provided a total of 12,700 hours of training in technical and administrative skills, while in 2020, we provided 6,314 hours of training respectively.

Interactive Platform E-Learning

We have been running interactive e-learning programs to develop our skills since 2016. These programs have had 2,199 entries in total, corresponding to 8,289 training hours.

Courses can be taken from work or home and there is flexibility in terms of hours and days of attendance.

	Category	Hours of Training	Percentage	Average training/employee
2018	Upper level executives	467	1.3%	39.4
	Mid-level executives	3,709	10.22%	
	Technical Personnel	8,224	22.66%	
	Sales & Customer Service	14,788	40.77%	
	Remaining Personnel	9,089	25%	
	Total	36,278		
2019	Upper level executives	96	1%	14.46
	Mid-level executives	1,477	11.5%	
	Technical Personnel	4,600	36.2%	
	Sales & Customer Service	3,903	30.7%	
	Remaining Personnel	2,624	20.6%	
	Total	12,700		
2020	Upper level executives	54	0.9%	7.21
	Mid-level executives	541	8.6%	
	Technical Personnel	1,996	31.6%	
	Sales & Customer Service	1,111	17.6%	
	Remaining Personnel	2,618	41.4%	
	Total	6,320		

At WIND you keep growing | Training programs

Leadership Campus

This is the program for developing the leadership skills of the leading teams of WIND Hellas. It is based on the latest development methods through multi-theme and interactive workshops, meetings, coaching and participation in information workshops. For the 7th consecutive year, in 2019 we conducted 960 hours of training with the participation of 30 executives, whereas the total hours from the start of the program are 7,438.

Power BI

For the second and third consecutive years, special trainings were planned at Power BI, a tool with which we combine data and create interactive illustrations and reports to make more effective administrative decisions. Thus, 146 employees participated in a total of 2036 training hours in 2019, while in 2020, 26 employees participated in 264 training hours.

Compliance Awareness Training

In recent years, WIND Hellas has focused on the adoption of a Responsible Corporate Culture, confirming its commitment to compliance, both with the legislation and regulations governing its operation and with its values and

principles. For this reason, we have developed an educational program (e-learning), which covers the Regulatory Compliance Framework, Information Security issues and other policies of our Company (such as ISO certifications and corporate procedures, corporate responsibility policy, etc.). In 2020, a total of 525 employees attended the program, having completed 788 hours of training.

Other internal training programs

And in 2019 we continued the initiative to organize in-house trainings, disseminating knowledge to our colleagues. Indicatively, we mention the following seminars: ClearView Training, New NectarPlus Training, SAP Training, NGA-Passport-OMNI Training, Fire Safety/Fire Protection and First Aid seminar held in 2019. By these actions 2,754 hours of training have been completed covering the educational needs of various groups.

“WIND Digital Learning Hub”

In 2020, the transformation of WIND Hellas into a “Digital Learning Hub” was at the heart of our strategy for the development and education of our people. The purpose of this initiative is for us to gain knowledge, maximizing the benefits of the challenges of the new digital age and constantly enhancing our skills. Through the training activities carried out in 2020, we aimed to strengthen the existing technical skills of our people and to acquire those that go hand in hand with the era of digital transformation that we are going through. We have strengthened all our commercial roles with knowledge on new technologies and we have built strategic collaborations with international educational organizations, specialized in new technologies, in order to train and certify our people on them.

“Technical for Non-Technicals”

This is an internal training program that was created in 2020, with the aim of familiarizing the employees belonging to commercial and support groups of our Company with the most important new technologies that have emerged and are going to directly affect the products and services of WIND Hellas. In this way, we seek to provide the best customer service experience and to ensure effective collaboration between our teams, through a “common language” for the new digital age. In total, 2,043 hours of training were completed under the program, involving 271 employees.

“Evolving - Mentoring Youth” program

Both in 2019 and in 2020, we are continuing our collaboration with the Future Leaders organization, whose goal is to support NGOs with the contribution of experienced executives in the development of business plans and their practices. To date, 19 executives of our Company have participated in the program.

Being “present” in Educational Workshops and Universities

With the same consistency and interest, we continue to be present to actions aimed at young people and create opportunities for their interconnection with the business community. In 2019, we “opened up our door” to the students of the Postgraduate Program in HR of the Athens University of Economics and Business, in an interactive day, where they had the opportunity to get to know through presentations the areas in which the HR team of WIND Hellas operates. At the same time, we reward

excellence and effort by honoring each year the distinguished students of the Postgraduate Studies Program “Economics and Business Strategy” of the University of Piraeus and offering them internships for obtaining professional experience.

A glimpse at the outside world!

An important part of the development of the people of WIND Hellas is encouraging them to participate in conferences and workshops. Thus, for 2019, 43 colleagues participated in 18 conferences in 6 cities and completed 828 training hours in total, while in 2020, 15 colleagues participated in 4 conferences in 2 cities and completed 280 training hours in total.

Managing Talent & Succession Planning

Being able to timely forecast the Company’s future needs as well as to identify talented executives, is extremely important to us at WIND Hellas. This led to the design and implementation of the “WINDerful Talent” program.

Attracting candidates

Internal Candidate Recruitment

We encourage the employees of WIND Hellas to explore development opportunities in other groups and functions of the Company. Thus, when new jobs arise, we choose among the existing employees as the best source of qualified candidates. In 2019, approximately 16% of WIND Hellas employees made a significant step forward either by being promoted, changing responsibilities or moving to new teams, while for 2020 this figure rose to 13%.

External Candidate Recruitment

In addition to posting our jobs in the renewed Career Page of WIND Hellas, we support and participate in multiple career days with the aim of attracting candidates, informing them about opportunities for work and development at WIND Hellas, and also highlighting the Company’s image as an employer. Both in 2019 and 2020, we participated:

- ▶ in the Career Days of cariera.gr, giving the opportunity to its employees to participate in it, interacting with the external audience and presenting the Company through their own role.
- ▶ in the career days of Greek universities (MBA Career Days of the Athens University of Economics and Business, ALBA Career Forum, Career Days @Deree College, Employability Fair by Mediterranean College) attracting a significant number of candidates.

WIND Young Talents Graduate Trainee Program

Since October 2015, our Company has implemented 3 “WIND Young Talents - Graduate Trainee Programs”, whereby 30 new university graduates with a Master’s degree, talent and will, and without any previous relevant work experience, joined its team. Those young people accepted the invitation to “show that they’ve got it”, participated through the interactive microsite of the program <https://windyoungtalents.gr/>, stood out through a systematic and specialized selection process and were eventually recruited on an open-ended contract.

Incubators

In 2019, we launched for the first time a new initiative to specialize young people and connect them to the labor market, which was named “Incubators”. Incubators, having completed their training in a modern work environment, can be organically absorbed into the Company, whenever a need arises. Indicatively, this initiative started with the CRM team and, in 2019, it was also adopted in other departments such as Marketing and Network, with a total of 5 incubators. In 2020, 4 new incubators have been admitted to IS departments.

Corporate Induction Programs

Since 2014, we have been holding the program Welcome OnBoard, for new hires in all departments of the Company. This is an event aimed at familiarizing new hires with the operations and the way we work at WIND Hellas, in a simple, interactive and effective way.

Two-way Communication

At WIND Hellas, we utilize modern internal communication media, informing employees on issues of direct concern. The methods and channels of open and constructive dialogue that we use are research, workshops, meetings, electronic communication, the newly renewed WIND Intranet, where all the news concerning our Company and industry are posted, as well as our most state-of-the-art platforms, such as MS Teams. Finally, it is worth mentioning that, in special circumstances, special microsites are also created for internal use in order to provide adequate information and guidance to our colleagues about events of interest to them (e.g. WIND intranet).

Employee Opinion Surveys

As regards investigations, our major Employee Opinion Survey, which takes place every two years, in July 2020, introduced Pulse Check, a series of small, regular and short questionnaires that lead to “quick win action plans” within the teams, in order for us to strengthen this significant institution.

It is worth noting that the participation rate of WIND Hellas employees in the July 2020 Pulse Check reached 85%, while regarding the results, there were significant increases in relation to the 2018 survey, both in the percentages related to the Engagement of our people (increase of 5 percentage points) and the percentages related to Enablement in the organization (increase of 12 percentage points).

Digital Transformation and WIND DigitAll Campaign

Having made a strong start as early as 2017, a number of new tools came to complete the Company’s digital transformation and provide flexibility to the way we work and interact. The initiative of the WIND DigitAll campaign gave us the opportunity to introduce and provide our employees with a new, easier and more state-of-the-art way of working. So, long before we had to move to teleworking due to COVID-19, the employees of WIND Hellas were already familiar with and systematically used all of Microsoft’s cloud digital tools (MS Teams, One Note, One Drive etc.).

Volunteerism - Social Contribution

Our social responsibility begins with our employees, who participate in various social responsibility actions, which are addressed to vulnerable social groups that need support as well as to the environment. Specifically, in 2019, employees supported the Animal Welfare Association of Nice, by actively taking part in the Sunday walk for the animals, contributing to the Easter Bazaar of the association and offering a significant amount of food, medicines and financial support. At the same time, through the cooperation and initiative actions of the employees, we continued to support notable organizations by offering intensive work, such as WWF and Boroume. Finally, in Christmas 2019, in addition to our traditional events, we had the chance to participate in another great event. We were given the opportunity to actively participate in the work of ELEPAP by purchasing gifts, books and toys for the children of the organization. An even greater initiative was the decision to deliver the gifts directly from our colleagues, along with a sum of money that supported the treatments of children.

Employee Blood Bank - Voluntary Blood Donation Program

This is one of our most important initiatives that was started in 2002 and since then is implemented twice a year. Since 2002 and to date, the Blood Bank counts 1,426 voluntary blood donations. In 2019, the Blood Bank covered the needs of 29 of our fellow human beings (colleagues and their relatives) with 42 blood units, while in 2020, the Blood Bank covered the needs of 18 of our fellow human beings (colleagues and their relatives) with 28 blood units.

euWIND wellness and activities program

In 2016, with the participation of the employees themselves, a health and wellness program was designed and launched for everyone. Three years later, euWIND is now an integral part of the daily lives of employees with 12 activities and over 800 total participants!

Activities:

- ▶ Parents’ Academy
- ▶ Hiking
- ▶ Cross Training
- ▶ Football
- ▶ Basketball
- ▶ Volunteer group
- ▶ Yoga
- ▶ Power Pilates
- ▶ Self-defense
- ▶ Music ensemble
- ▶ Photography Courses
- ▶ Anti-smoking seminars

The program continues and is strengthened thanks to the participation, open dialogue and voluntary-coordinating action of our employees. In 2019, two more activities were added, cross training and Power Pilates. In 2020, the program was suspended due to COVID-19.

However, in 2020, the winners of euWIND | Youth Excellence were awarded, an initiative aimed at rewarding excellence through the ambition, talent and perseverance of the children of our employees to be distinguished in important areas such as education, research and technology, art, sports, volunteering. Among the numerous entries, the evaluation committee consisting of members of the Management, as well as distinguished academic representatives, reached at 10 winners who received the scholarships of €4,000, €7,000 and €10,000.



Other events for parents and children

At WIND Hellas, the children of our employees are looking forward to the celebrations that are always accompanied by small surprises. Thus, in 2019, we have collaborated with the Hellenic Cosmos, the Christmas Theater and other smaller theaters and have offered to our employees interesting and creative choices to enjoy with their children on Easter and Christmas. In addition, in collaboration with the Eugenides Foundation, 60 children and their parents had the opportunity to discover the world of science and technology. Finally, in 2020, in the framework of our cooperation with the Athenian Theaters, 80 double invitations were offered for 4 performances, following a draw.

New Facilities!

At the beginning of 2020, all WIND Hellas employees welcomed the new and renovated WIND Hellas buildings. The design philosophy followed was based on our renewed work style and modern trends in the design of the workplace. Our workplace was designed to contribute to the way we have chosen to operate at WIND Hellas, focusing on flexibility, team spirit, emphasis on hygiene and safety as well as respect for the environment.

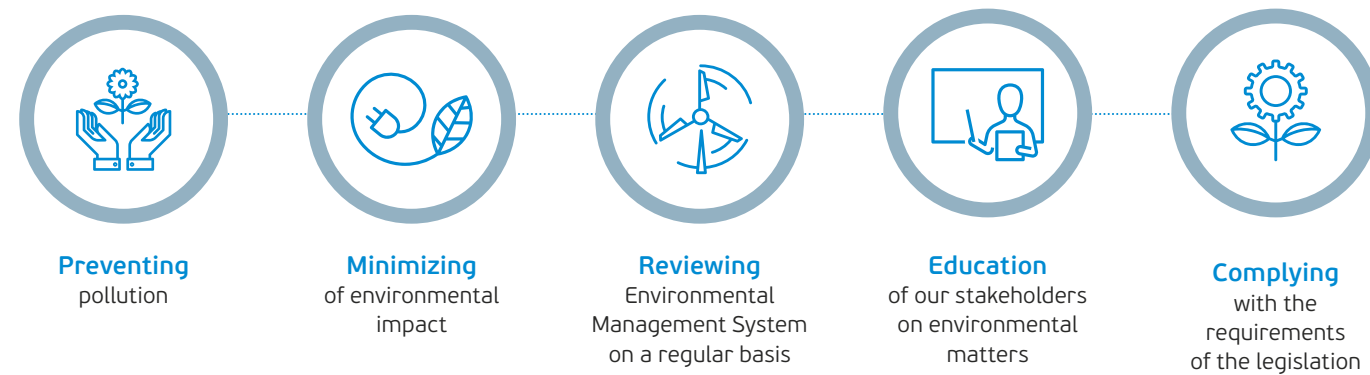


A photograph of a person walking away on a dirt path through a dense forest. Sunlight filters through the trees, creating a warm, golden glow. The path is covered with fallen leaves. The person is wearing a light-colored jacket and dark pants.

07

ENVIRONMENT

We care about the environment and we are 100% committed to reducing our impact on it. Our focus is to improve our environmental performance through our policy and the implementation of the Environmental and Energy Management System, that helps us monitor and manage the consequences arising from our operation.



The effects of our operations vary. The most significant ones are shown in Table 1. The evaluation of impacts is reviewed on a regular basis so as to ensure we are up to date and aligned with new circumstances and requirements, new technologies, etc.

Table 1: Significant environmental impacts from our operations				
Subject	Environmental Impact	Response	Objective 2019-2020	Result
Energy Consumption Direct and indirect emissions of pollutants	Depletion of natural resources, atmospheric pollution, contribution to climate change and atmospheric acidification.	Carrying out energy audits and identifying energy saving opportunities. Preparation of a long-term action plan, with a focus on energy-savings in buildings and increasing the use of renewable energy sources.	Reduction of energy consumption by at least 5% in buildings, through actions that increase the efficiency of data centers. Certification of a store as climate-neutral.	Reduction of electricity consumption in buildings by 7% (1,680MWh). WIND Kifissia branch certified as "Climate-Neutral"
Waste emission	Depletion of natural resources, creation of pollution, landfill saturation.	Actions with the three-fold focus "Reduce-Recycle-Reuse".	Increase in paper savings from the increase of registered subscribers to My Wind/E-bill online services. 100% recycling of all hazardous waste.	Increase of registered users by 75% compared to 2018. Increase in minimum paper savings per year by 70% compared to 2018 (116 tones per year compared to 68 in 2018). 100% recycling of hazardous waste.
Electromagnetic emissions	Atmospheric pollution.	Environmental Impact Assessments, EM Energy Emissions Assessments, compliance with limits and standards set by Greek and EU legislation as well as international standards.	No limit overrun by individual base station.	There were no violations of limits (except antennae parks) in 2019, in 2,102 measurements of the EEAE from all sources. In 2020, in a total of 1,915 measurements, EEAE recorded an exceedance of one (1) competing company station.

There were no significant financial or non-financial penalties for 2019 and 2020. Environmental protection costs (compliance with the obligations of producers under Law 2939/2001, as well as ISO certifications for environment, energy) ranged at €13,000 for 2019 and 2020 respectively.

(1) Excluding antennae parks that also host base stations for radio transmission, TV, digital TV, TETRA base stations, radar etc., and any violation concerns cumulatively all transmission facilities. (2) Source EEAE.

Climate, Energy and Energy Management

As data traffic in our networks increases, we focus on increasing our energy efficiency, where possible, by implementing actions aimed at reducing our total energy consumption.

At the same time, we monitor direct and indirect emissions of pollutants (translated into carbon dioxide equivalent) from all sources, and with a focus on the long-term target for zero carbon emissions. In this context, we have piloted the first climate neutral store in Greece, while within the next five years we aim to increase the number of stores that will operate with a neutral sign.

Acknowledging the importance of green electricity, free from carbon dioxide and other greenhouse gas emissions as much as possible, we evaluate our own potential for electricity generation from RES in our buildings and we are exploring the market for the possibility of supplying energy with guarantees of origin through DAPEEP (former LAGIE, Operator of RES & Guarantees of Origin). Our goal is to purchase, in 2021, guarantees originating from RES for 100% of our invoiced electricity from our providers.

Total energy consumption

The majority of the energy we consume is electricity from the national grid, but we also use diesel, fuel oil, and gasoline for vehicles. We did not consume energy directly generated from RES during the years 2019 and 2020. The total energy consumed in 2019 amounted to 401,583 GJ, including fuel for vehicle fleets, while in 2020 the amount consumed was 440,184 GJ. Electricity accounts for about 88% of the total.

The efficiency of the energy used (energy intensity), expressed as units of energy consumed in relation to the total annual revenue, in 2019 was 0.7765 GJ/thousand € and for 2020 was 0.8655 GJ/thousand € (2018: 0.7187). The increase is attributed to the expansion of our mobile and fixed telephony networks and the consequent increase in electricity consumption in these networks.



FIGURE 1: Energy Consumption Allocation 2019-2020 (%)

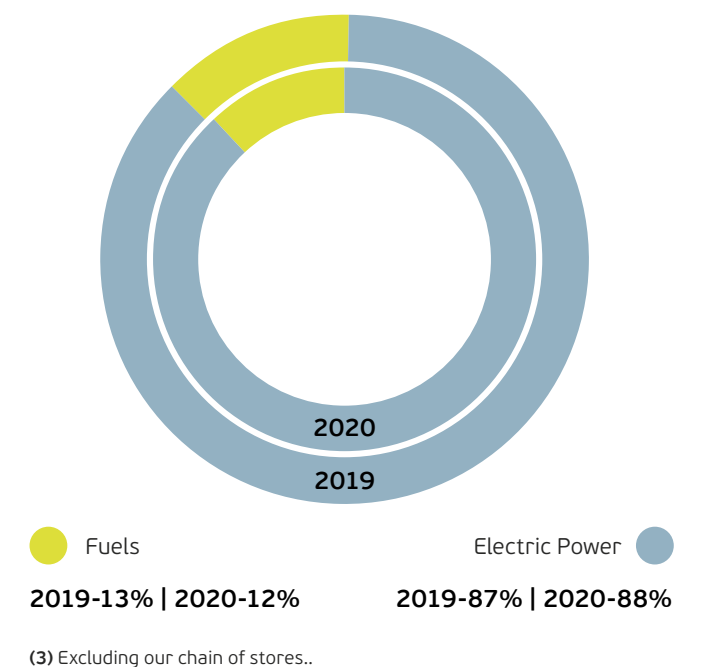
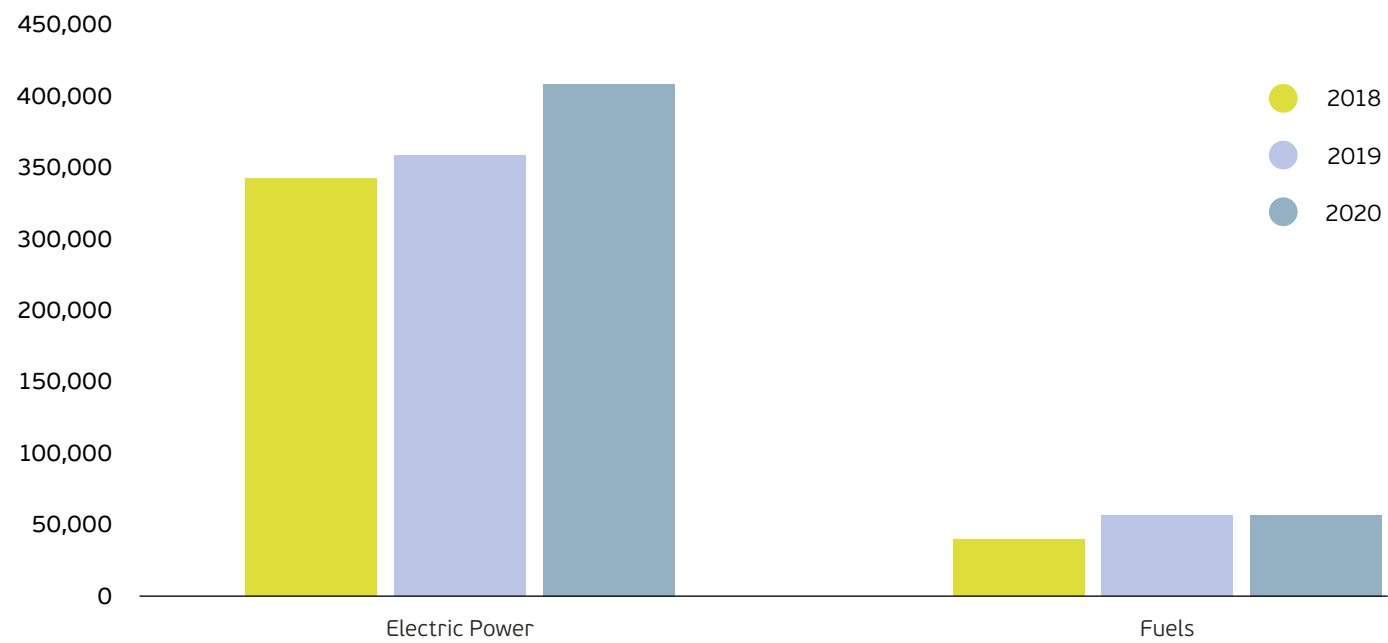
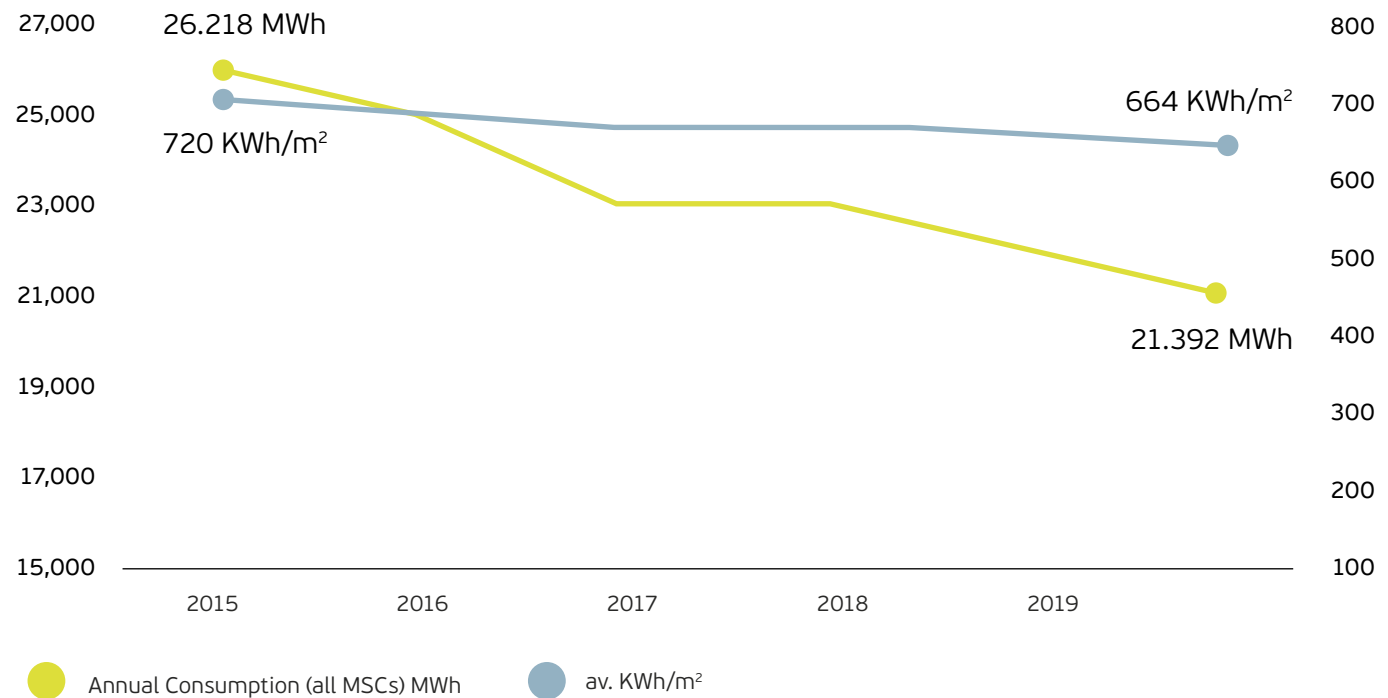


FIGURE 2: Energy Consumption 2018-2020 (GJ)



In 2019, as in 2020, we achieved a reduction in consumption in telecommunications and office buildings by 1,680MWh or 7% compared to 2018 (887 MWh in 2019 and 793 MWh in 2020). The reduction is the outcome of our five-year implementation of interventions aimed at increasing the efficiency of data centers and other installations and equipment (electromechanical premises, air conditioning, lighting, heating, etc.).

FIGURE 3: Evolution of electricity consumption in buildings and related consumption (per sq.m.) 2015-2020



Identifying opportunities

In 2018, we conducted energy audits in all telecommunication centers, our offices and the mobile telephony network. The audits were carried out by independent and experienced energy auditors, with the aim of identifying opportunities to improve efficiency and energy savings. The action plans resulting from the above audits have been incorporated into our planning and will be implemented gradually as of 2022 in our buildings, with the aim of saving an additional 10% compared to before. Independent energy audits will be repeated in 2022.

In addition, we continue to optimize the use of installations, even reducing the number of them where technology allows us to reduce our footprint. So, in the long run, we also plan to reduce the number of data center installations, projects that will lead to additional energy savings. In 2021, a facility in Thessaloniki is planned to be evacuated.

Fuel consumption

All fuel we use comes from non-renewable sources.

FIGURE 4.1: Energy consumption – Use of fossil fuels (%) 2019-2020

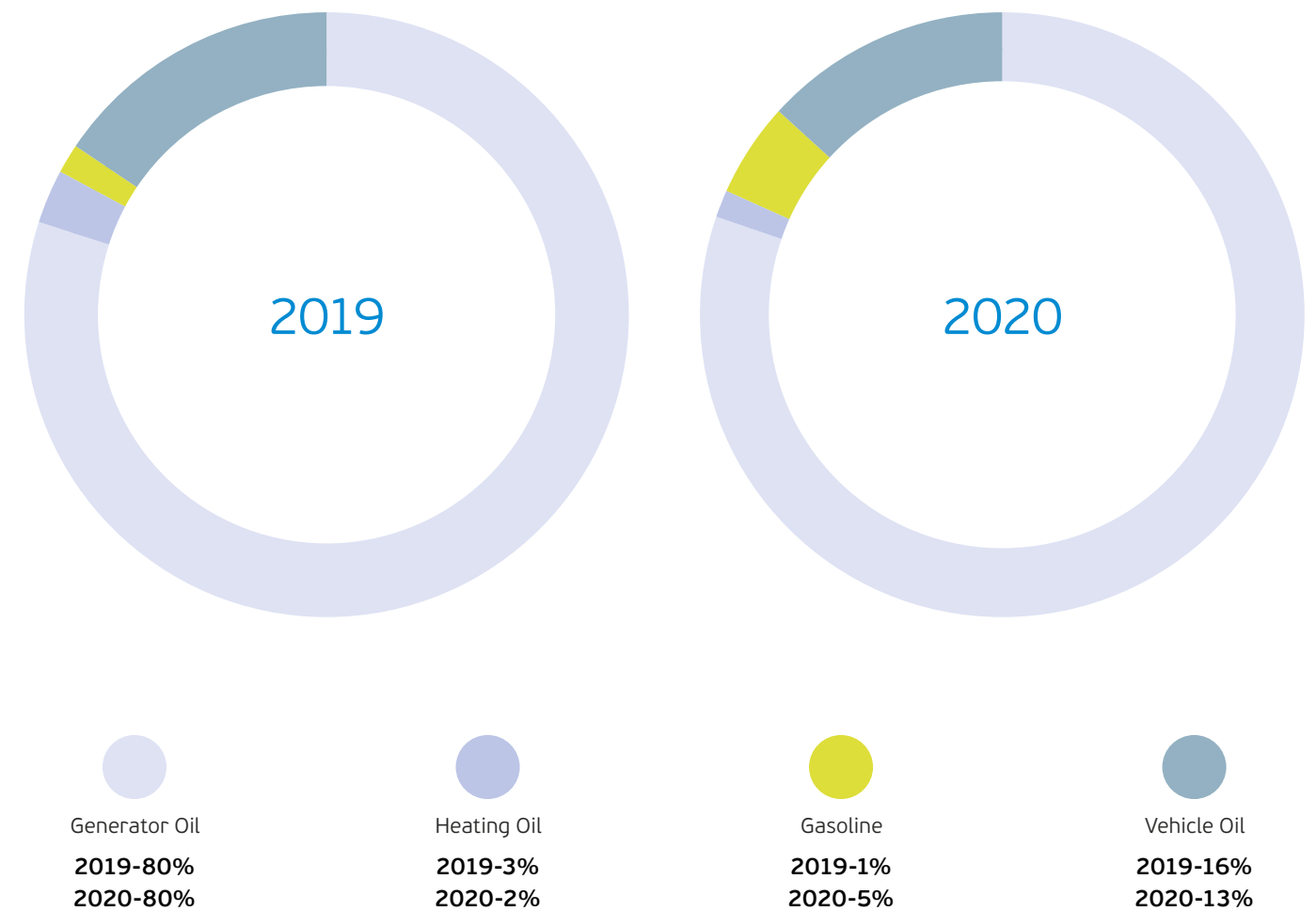
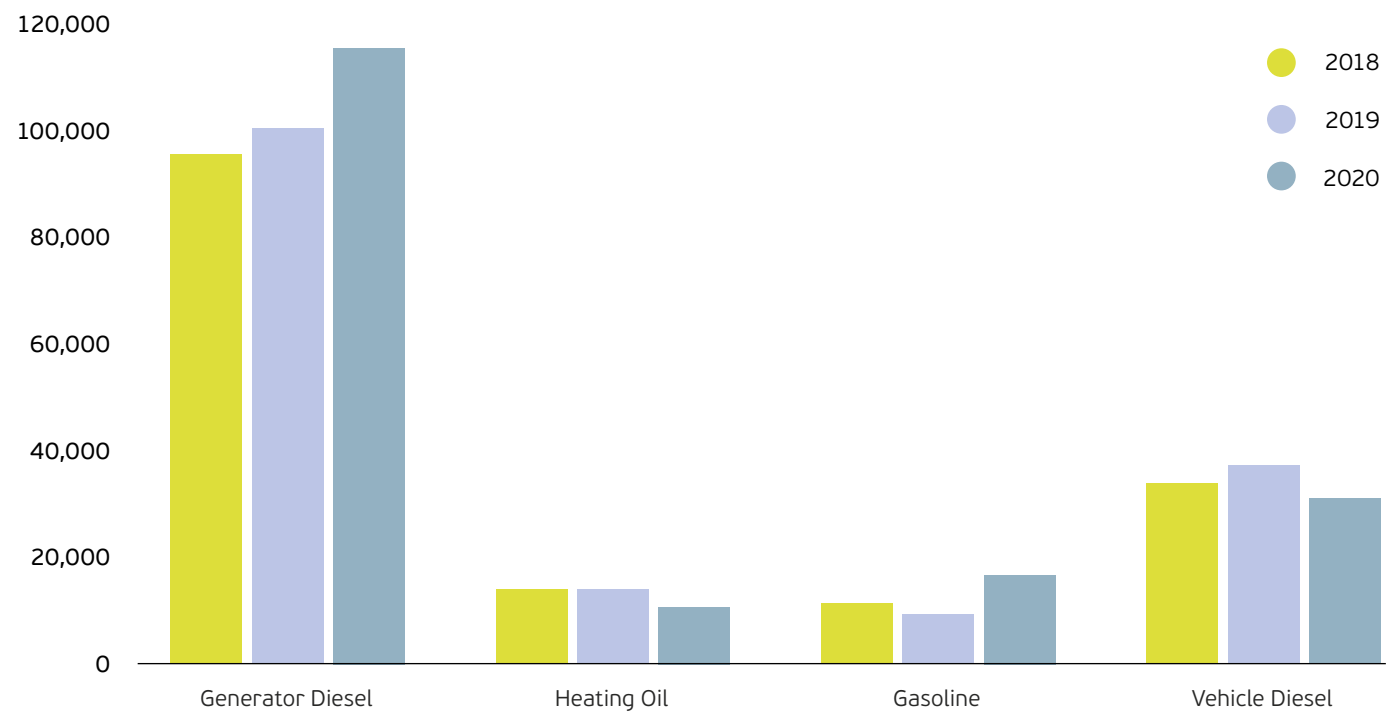


FIGURE 4.2: Energy consumption – Use of fuels (Lt)



In 2019, we consumed a total of 1,470,748 liters of fossil fuels, broken down as shown in Figure 4. In 2020 we consumed 1,461,502 liters in the same uses. There is a decrease in heating oil due to a change of the infrastructure in an office building of WIND, which now uses a heat pump instead of an oil burner. There is also an increase in petrol used in cars, following a change in the policy of benefits to vehicle users. At the same time, in 2020, there was a decrease in diesel use due to movement bans which reached 16%.

The vast majority of fuel consumption is still due to the operation of Back-up power generators, as well as the limited number of stations operating without access to a power grid. Of these, 75% operate with a hybrid power-generating system based on circular operation of a diesel engine and battery pack. During the operation of the diesel engine the batteries are charged, which in turn electrify the station for the remaining half of the time. This reduces diesel consumption at these stations by half. At the same time, there is a constant effort to interconnect remote stations to the electricity grid. In the last decade, the number of stations operating exclusively with a generator has decreased by 83% (from 281

generators to just 47 in 2020), resulting in a reduction in fuel consumption and emissions.

The use of fuel in backup generators depends on the number of failures/interruptions of the electricity grid each year.

Vehicle fleet

With respect to the corporate vehicle fleet, these consumed a total of 252,286 liters of fuel in 2019 and 267,201 liters in 2020, of which approximately 28% was unleaded gasoline and the remaining was diesel. In 2019, this figure was 9%. The higher share of petrol is due to a change in the benefits policy. The (annual) consumption per vehicle stood at 1,452 liters in 2020, increased by about 100 liters per vehicle compared to 2019. Total fleet emissions for the year 2019 were 665.84 tonnes CO₂e and for 2020 685.33 tonnes CO₂e .

Emissions

The emissions of pollutants that we monitor and record involve the consumption of electricity, the use of fuels and the leakage of refrigerants. We include all WIND Hellas facilities except the chain of stores.

Total emissions of pollutants were 100,030 tonnes of carbon dioxide equivalent in 2019 and 110,692 tonnes in 2020, an increase of 12% compared to 2018. The increase is due to increased energy use due to the expansion of fixed and mobile telephony networks.

To calculate the emissions we used the guideline of the World Resources Institute. Exceptions are emissions from electricity consumption for which we use the proposed coefficient by the Ministry of Environment and Energy, as published in the Guidelines for Energy Audits.

FIGURE 5: Distribution of pollutant emissions per source (tn)

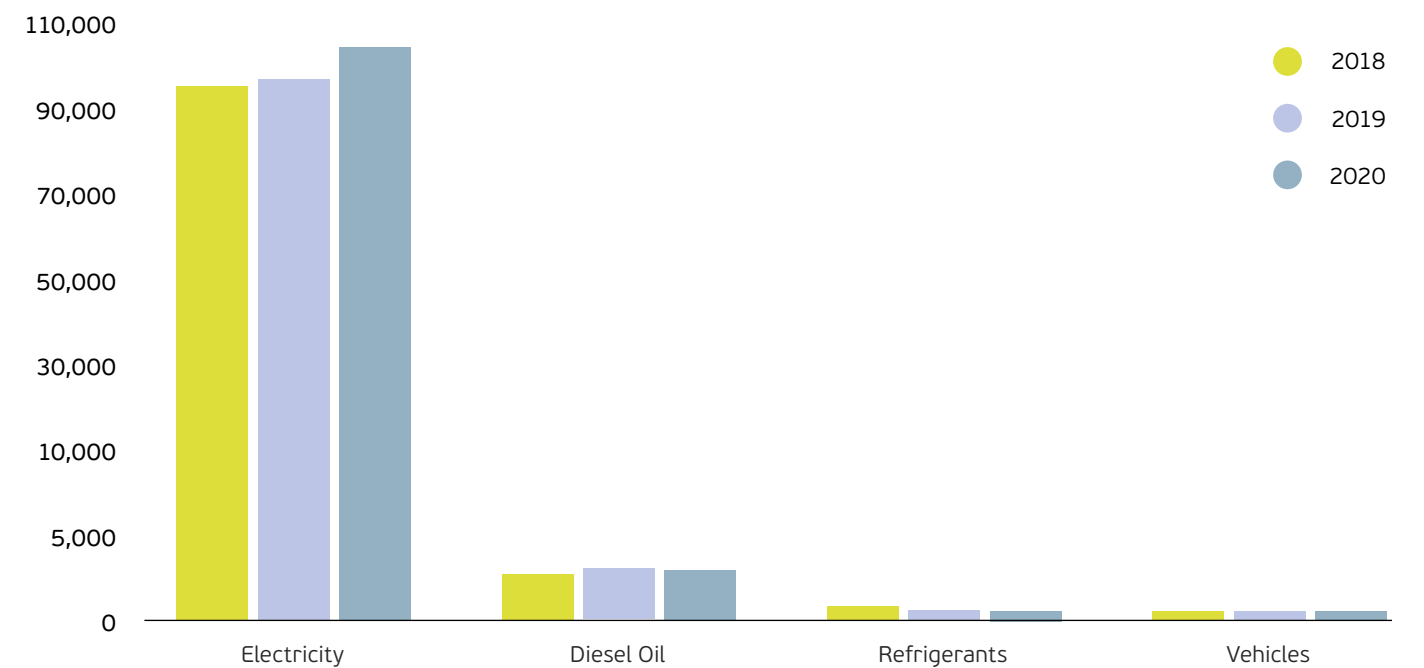
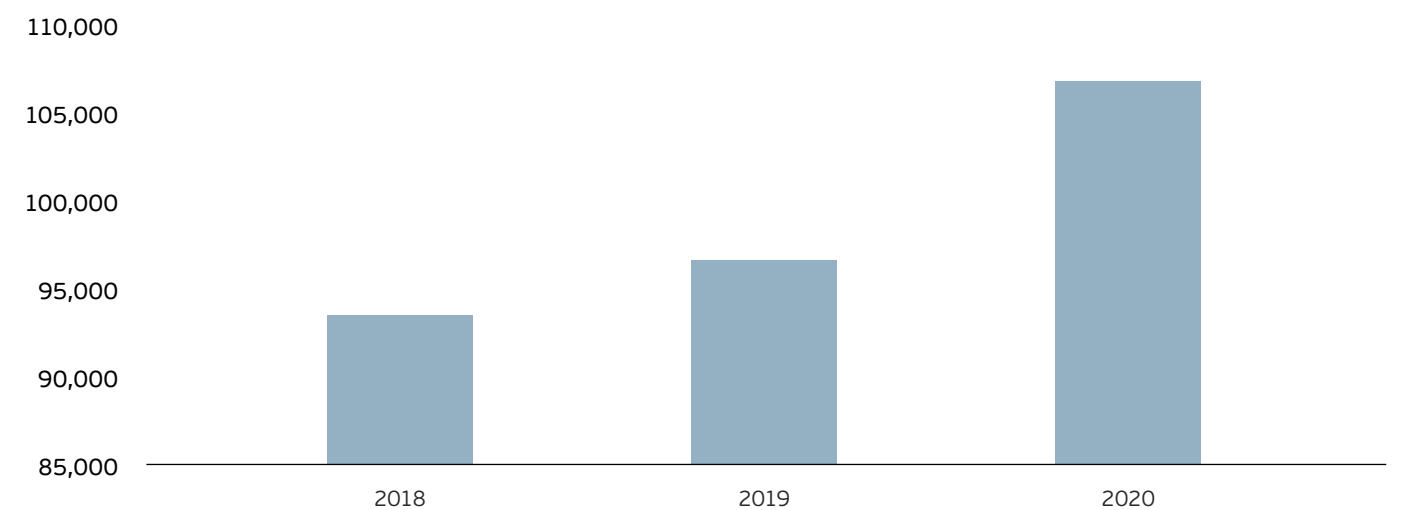
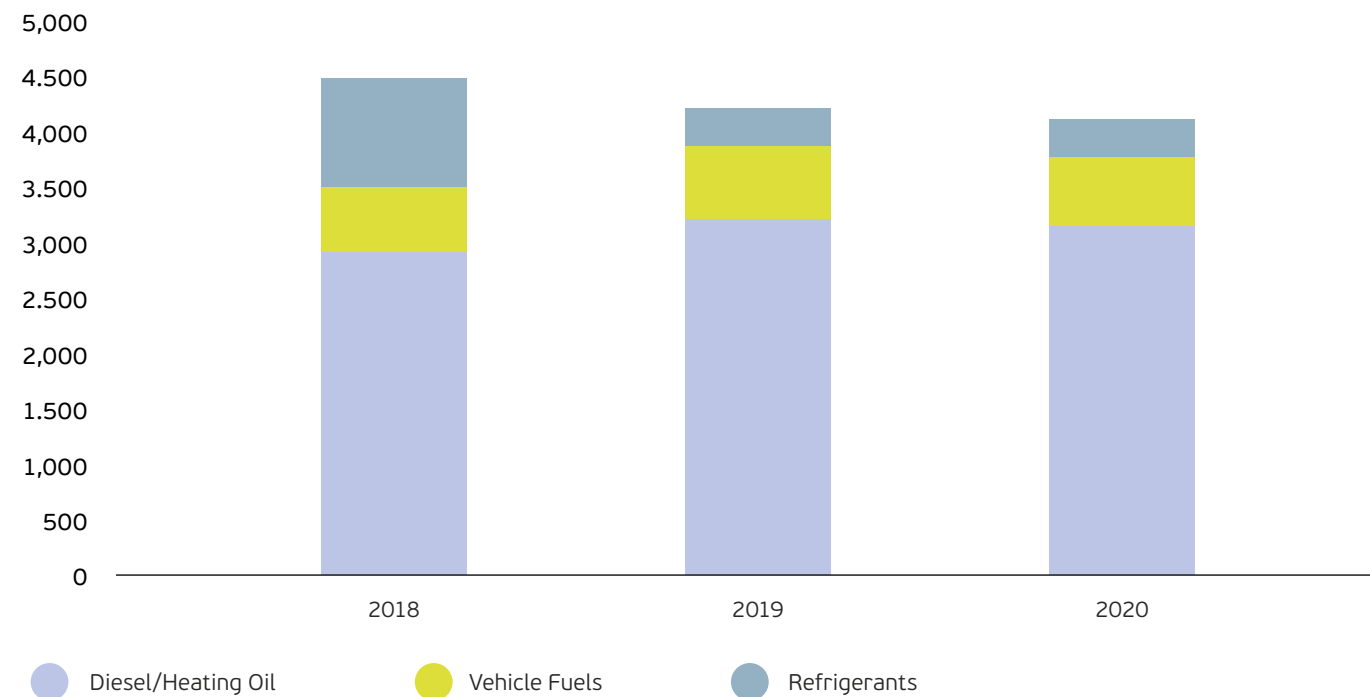


FIGURE 6: Pollutant emissions (tnCO₂e) 2018-2020/Electricity



(4) Emissions were calculated using the calculation tool of the Greenhouse Gas Protocol "World Resources Institute (2015). GHG Protocol tool for mobile combustion. Version 2.6". (5) World Resources Institute 2008 : GHG Protocol Tool for Stationary Combustion Version 4.1 (2015).

FIGURE 7: Pollutant emissions (tnCO2e) 2018-2020 (without electricity)



Ozone Depleting Substances (ODS)

The operation of air-conditioning machines results in hydrofluorocarbon emissions with a particularly high global warming potential (GWP), although they have zero ozone depleting potential (ODP). Considering that the quantity in the circuit of each machine can potentially leak into the environment, we estimate this quantity as air pollution in carbon dioxide equivalents and add it to our overall footprint. To calculate the pollution, we use data of the IPCC (Intergovernmental Panel for Climate Change).

In order to reduce the burden from this category, we apply a continuous monitoring and maintenance program, and if necessary, we replace our old air conditioning machines with newer ones, which present fewer failures and leaks. The total charge for 2019 due to leaks was 293 tn CO2e and for 2020 it is estimated to range at the same levels⁷.

Electromagnetic Radiation

At WIND Hellas we have adopted a responsible approach with respect to monitoring and measuring the levels of electromagnetic radiation.

During the installation, operation and control of our network operation, we comply with all international safety standards as well as the guidelines of the Greek legislation. We recommend to the general public to address only to competent bodies and to receive information from the communication material, which they issue specifically for this purpose, such as:

- ▶ Brochure on mobile telephony Mobile Telephony and Health
- ▶ World Health Organization (WHO) Newsletter
- ▶ Websites of the Hellenic Observatory on E/M Fields with available measurement results on interactive maps

The body responsible for non-ionizing radiation is the Hellenic Atomic Energy Commission. Within the scope of its competences, it performs radiation measurements at stations throughout the territory, including communications providers as well as TV stations, etc.

Waste Production & Management

The waste produced from our operations is collected, separated and utilized (recycled or reused) and whenever this is not possible due to technical reasons, it is disposed to landfill sites provided it is not hazardous waste.

The main categories of waste produced are packaging waste (paper, wood, plastic), electrical and electronic equipment waste, accumulators and batteries and mixed (urban type) waste which are carried to landfills.

In addition, excavation, construction and demolition waste (ECDW) is generated from the upgrade/expansion works of our network, or the dismantling of old stations.

The management is made by disposal to licensed recycling

facilities through a network of partners and/or relevant collective management systems.

We participate or collaborate with most collective systems. Our participation ensures that our obligations to recycle these types of waste are met, either as obligated producers or as collection points for the public or employees. We collect mobile phones and batteries in our stores, and at the same time we encourage our employees to bring from home devices for recycling, through a special program that covers devices of all kinds and batteries, lamps and clothing.

Waste production in 2019 reached 255.9 tonnes, considerably reduced from 2018 due to the absence of construction and demolition waste. Production in 2020 amounted to 157.2 tonnes.

Collective System	Type of Waste
AFIS (RECYCLING OF WASTE PORTABLE BATTERIES)	Small household type batteries
APPLIANCES RECYCLING S.A.	All types of electric and electronic equipment
COMBATT SA	Industrial type batteries, accumulators
SY.DE.SYS S.A.	Industrial type batteries, accumulators
E.P.E.N.DI.SYS (RE-BATTERY)	Industrial type batteries, accumulators
FOTOKIKLOSI S.A.	Lighting equipment, light bulbs, light fixtures
HELLENIC RECOVERY RECYCLING CORPORATION - EEAA	All product packaging

Waste Management

Excluding excavation waste, the production of waste was higher in hazardous waste (102.6 tonnes in 2019 and 107.17 tonnes in 2020) than non-hazardous waste (51.9 tonnes in 2019 and 50.05 tonnes in 2020), all reduced compared to 2018 (120.54 tonnes of hazardous waste and 171.35 tonnes of hazardous waste). The observed fluctuation is mainly due to the projects being carried out (e.g. in 2018 more than 900 tonnes of ECDW were produced due to network works, which were not produced in 2019 and 2020) but also to the periodicity of maintenance works (e.g. battery replacement plans). Warehouse clearing operations from materials for which alternative management was not

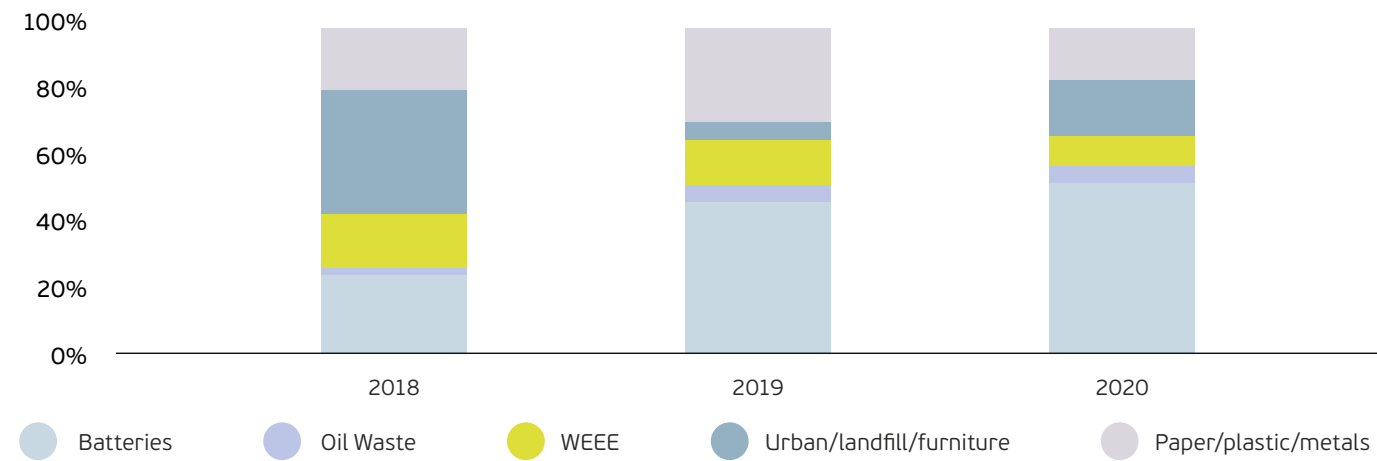
possible also affect the quantities disposed at landfills. The usual quantities of such items are furniture. Efforts are always made to donate such items if they are in good condition, but a sufficient quantity is still being channeled to the landfill in the absence of an alternative solution.

As regards ECDW (excavation and demolition waste), part of the generated materials are reused for filling openings and other materials are made available to the facilities of the competent Collective Management Systems for recycling and utilization. In 2019, 101 tonnes of ECDW was recorded, compared to 927 tonnes in 2018. In 2020 there was no ECDW.

(6) GWP IPCC 100: http://www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-2.html, <http://www.ipcc.ch/ipccreports/tar/wg3/index.php?idp=144>.

(7) In a calculation process at the time of writing.

FIGURE 8. Waste production distribution 2018-2020 (excluding ECDW)



In 2018, a total of 98 tonnes were channeled to landfills, or about 8% of the total, compared to just 30,72 tonnes in 2020 and 5,08 tonnes in 2019.

The total (100%) of hazardous waste is recycled, exclusively in facilities within Greece, with the help of appropriately licensed partners/collectors.

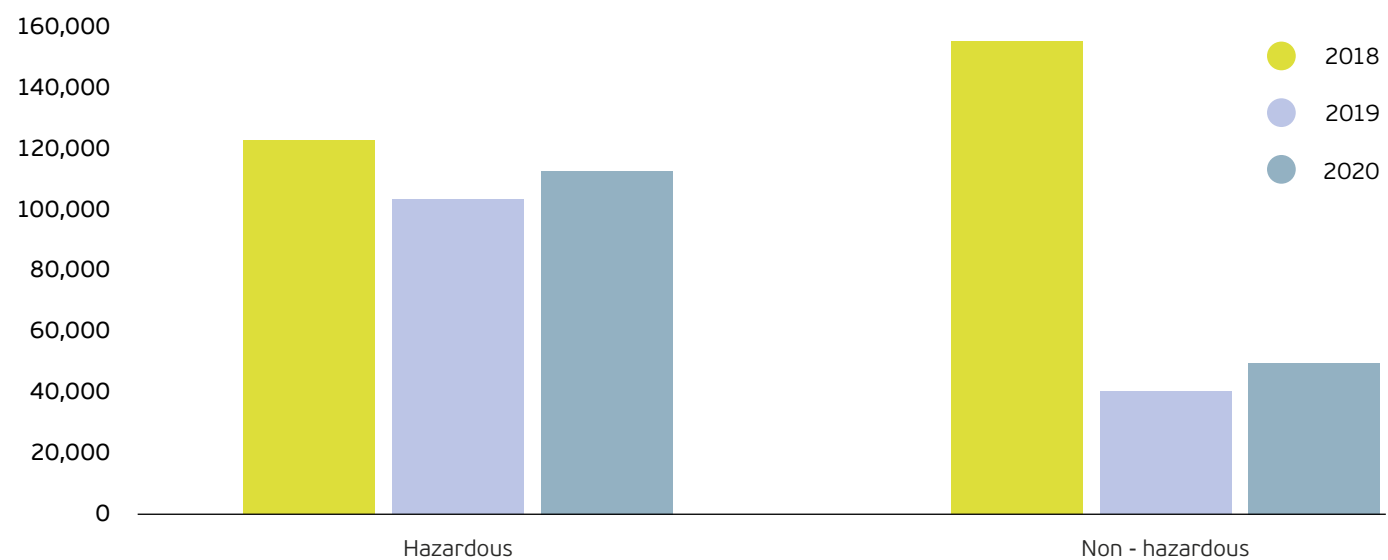
Reduction in paper use

For more than a decade, actions aimed at reducing paper have been implemented. The relevant actions are aimed at our internal processes as well as the general public and our customers. Since 2001 we have started eliminating the use of paper where possible, and have already implemented many actions such as:

Internal environment

- a) Centrally programmed double-sided printing on all computers and the option for the scanning of documents, with an accompanying recycling program (bin at each printer, on each floor, in every building).
- b) Intranet with the ability of exclusive electronic management of documents and procedures (no printing is required at any stage), electronic approvals and digital signatures.
- c) Electronic issue of payroll.
- d) E-bill for all employees.
- e) Electronic system for managing employee assessments.

FIGURE 9. Distribution by type



Stores - Partners - Suppliers

- ▶ Removal of printing for specific documents
- ▶ Application of electronic invoices
- ▶ Replacement of printers in stores
- ▶ Application of digital signature in stores

▶ Digital stores offer a unique experience of technology and service to consumers, and a better environmental profile. They fully integrate the capabilities of digital technology and eliminate the use of paper and prints for display and advertising purposes to a large extent, saving more than 150 tonnes of paper annually.

Subscribers

▶ Providing e-bill/e-services to subscribers for easy, fast, secure, and paperless management management, as well as other services from any device. Increasing the number of registered subscribers is our constant goal every year.

Employees

In our internal environment, the paper consumption index per employee remained relatively stable in 2019, but due to remote working, the corresponding indicator was drastically reduced in 2020 as shown in the relevant graphs.

FIGURE 10.1: Consumption of A4 paper per employee/year (kg) and supply of A4

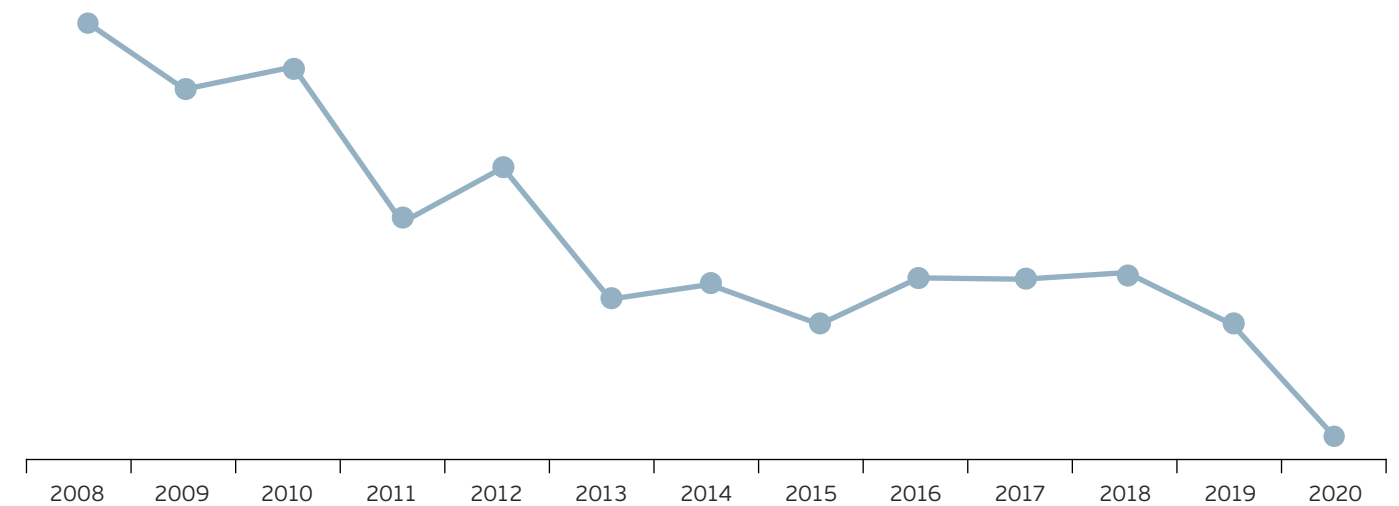
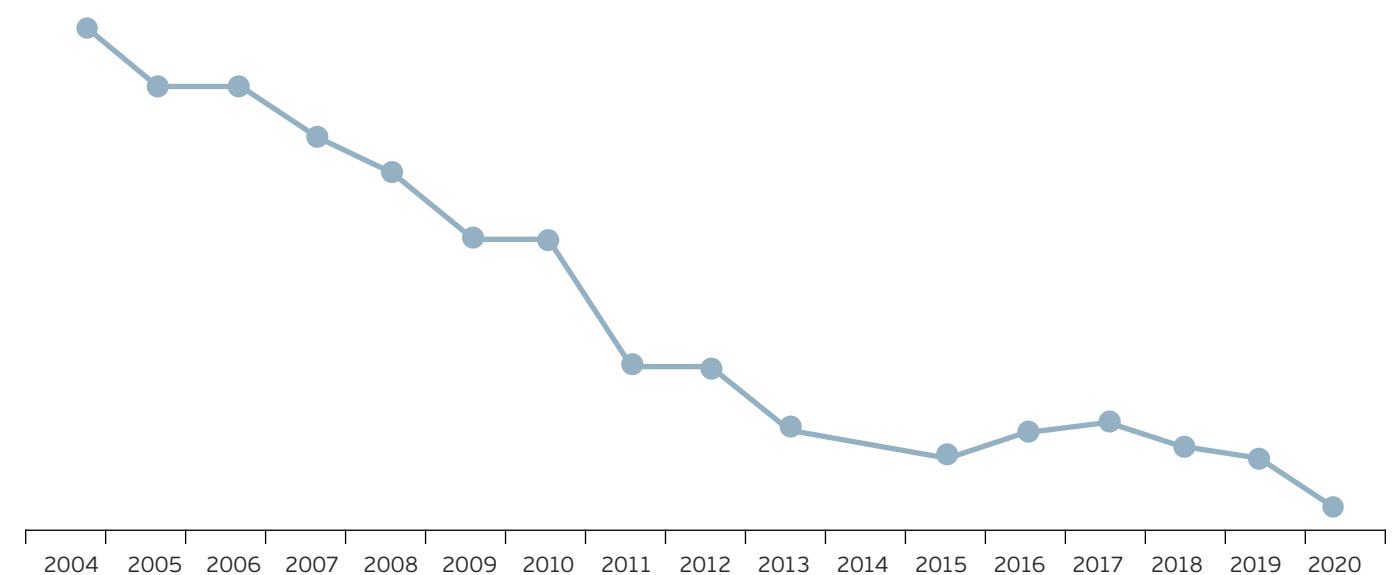


FIGURE 10.2: Consumption of A4 office paper/year (kg) and supply of A4



08

MARKET

We offer a great customer experience

We are committed to offer each customer an excellent communication and service experience and we keep an agile approach to respond to the challenges of the market. Our customer experience is a strategic priority at all levels and at all contact points.

Our Approach

Driven by our commitment to offer our Customers an excellent communication and service experience, WIND Hellas is constantly evolving.

Customer Experience Transformation

The customer-centric nature of the Company, which aims at creating and maintaining stable and long-term relationships with our customers, continued in the years 2019-2020. The excellent Customer Experience at all stages of both sales and service, is the “foundation” used to design and implement all processes, for all customer contact points - Retail Networks/Service Groups.

Customer Experience Transformation continues at a steady pace to be one of the main competitive advantages of WIND Hellas in the field of telecommunications. Relying on the actions of the previous years, in the midst of difficult circumstances (COVID-19), we continue to provide uninterrupted services to our customers, responding to the requirements of the industry, as the need for communication turned out to be a necessity.

The way of contacting our customers with our Company and the corresponding procedures were adapted in order

to achieve, with maximum security, the processing of their requests under these special conditions, either in person or remotely.

In addition to the continuous operation of the service and sales teams, there was further strengthening of the Customer Experience with “Digital Media”, such as customer service via social media (Facebook Messenger). In addition, by systematically monitoring and adapting the service guidelines in accordance with the GDPR rules, the security of our customers’ transactions and personal data has been enhanced.

The results of the Customer Experience Transformation have been reflected in the relevant corporate operating indicators in 2019 and 2020, such as e.g. a decrease in calls to the service centers, a decrease in the average customer handling time, an increase in the resolution of customer issues during the call, etc., and are expected to have an even greater impact in 2021.

In an even more demanding year we had systematic progress:

In mobile telephony:

- ▶ One in two private mobile customers enjoy the experience of W contracts, while already 16% of the subscriber base benefits from unlimited Data and communication with the new W Unlimited GB, W 5GB and W 2GB plans.
- ▶ Users making use of data from their mobile phone increased by 9% and at the same time we increased their average data usage by 58%.
- ▶ Our subscription base increased by 5% by improving the share of subscribers using smartphones and utilizing data services.

In fixed telephony and the Internet

- ▶ We focused on strengthening the bundle products for Fixed - Mobile and Internet with triple play solutions, more than doubling the number of those subscribers.
- ▶ We increased the subscriber base by 4.2%.
- ▶ We have increased the subscriber base on new generation networks (50, 100 and 200 Mbps access speeds) above 196%.

- ▶ We expanded 7 telecommunication hubs, which now total 328 (174 with physical collocation and 154 with remote collocation), providing fixed telephony and Internet services.

In pay TV

- ▶ WIND VISION ended up in 2019 with 66,000 subscribers and in 2020 with 74,000 subscribers.
- ▶ The 1st pay-TV service in Greece with Android TV decoder and with the ability to reproduce and transmit images at a very high resolution (4K & HDR10).
- ▶ The 1st Android TV pay-TV service in Greece using Google’s operating system that gives access to more than 5000 applications specifically adapted for the home TV screen.
- ▶ Strategic cooperation with international content providers (e.g. Netflix, FOX, Disney, National Geographic, Spotify, Amazon Prime Video, etc.).
- ▶ Free access to content from up to 4 mobile devices in addition to the decoder and possibility of simultaneous watching from 3 devices (decoder + 2 extras).



- ▶ Ability to watch on all TV devices in the house, without the need for a second WIND VISION decoder, through the Chromecast function available in the Smartphone and Tablet application.
- ▶ 1st service in Greece offering the possibility to pay Netflix without a credit card, through the account of WIND VISION subscribers.

Training our partners

We have set up appropriate modern educational programs and processes for both sale representatives and partners of the WIND Hellas chain of stores throughout Greece, which operate under franchise, as well as our partners in Call Centers for Customer Service with the ultimate goal to offer an unparalleled Customer Experience from all channels of contact with our subscribers.

The training programs concern all the knowledge and actions carried out by each channel, as well as the development of skills needed by the WIND Hellas representative, in order to achieve the maximum in customer service and experience.

Combined methods are used for the implementation of the training programs in order to achieve the maximum result.

Having already developed Digital training since 2018, in 2019 and 2020, in the midst of the pandemic, we were able to respond continuously to the educational needs of the channels using the following methods:

- ▶ Virtual classrooms
- ▶ Live webinars
- ▶ Attendance of electronic courses
- ▶ Electronic questionnaires for online knowledge assessment upon completion of each module
- ▶ Virtual on the job training

During 2019 and 2020, in all the above methods, 144,954 hours of training were offered to 5,322 professional sales and telephone representatives of our partners.

WIND Hellas Bank Blood Bank

We have created a WIND Hellas Blood Bank for the people working at the stores. So far we have been working with the General Hospital of Athens “G. Gennimatas”, the General Hospital of Thessaloniki “Ippokratio”, the University Hospital in Rio “Panagia i Voitheia”, the University Hospital of Ioannina and the University Hospital of Larissa, with more hospitals expected to be added soon.

Responsible Network Development

Since our establishment we have invested systematically in infrastructure and the development of our network with responsibility and sensitivity for public health and the environment. The aim of our strategy is to contribute to the digital transformation of our country and to make digital access to residents of remote areas a reality with the aim of equal participation in the digital future.

	Statement	2019 input
The mobile telephony network	In 2019, the population coverage of the network reached:	2G: 99.4% 3G: 94.9% 4G: 98%
	It concerns the development of a completely new radio network that allows nominal mobile broadband speeds up to:	42 Mbps for 3G 300 Mbps for 4G
	At the present project phase, we have completed the modernization of the stations that cover:	The entire Greek territory without exceptions
The fixed telephony network	In 2019, an extension was made to:	1 telecommunication hub
	Upgraded the connection circuits through backhauling at about:	123 circuit upgrades were performed at 102 fixed stations
	International Capacity:	405 Gbps
	GR-IX	20 Gbps
	Collocations in Telecommunication Hubs:	328
	Underwater Fiber Optic Cables between:	Greece - Italy Crete - Peloponnese Peloponnese - Central Greece
	With regard to VDSL coverage, WIND Hellas has reached urban centers by the end of 2018:	234 urban centers
E/M radiation & measurements	In 2019, measurements were carried out by WIND either in the context of the licensing of Base Stations or at the request of citizens.	In 2019, E/M measurements were made at WIND stations either by the Victus laboratory or by University Institutions upon our assignment.

2019 Coverage maps



	Statement	2020 input	
The mobile telephony network	At the end of 2020, the population coverage of the network as shown in the EETT report for H2 2020 reached:	2G: 99.4% 3G: 95.2% 4G: 98.1%	
	It concerns the development of a completely new radio network that allows nominal mobile broadband speeds up to:	42 Mbps for 3G 300 Mbps for 4G	
	At the present project phase, we have completed the modernization of the stations that cover	The entire Greek territory without exceptions	
	5G Network: At the end of 2020, it was developed in selected areas:	Attica and Thessaloniki	
The fixed telephony network	In 2020, an extension was made to:	0	
	Upgraded the connection circuits through backhauling at about:	232 circuit upgrades were performed at 142 fixed stations	
	International Capacity:	1290 Gbps	
	GR-IX	70 Gbps	
	Collocations in Telecommunication Hubs:	328	
	Underwater Fiber Optic Cables between:	Greece - Italy Crete - Peloponnese Peloponnese - Central Greece	
	With regard to VDSL coverage, WIND Hellas has reached urban centers by the end of 2020.	236 urban centers	
	By the end of 2020 the NGA FTTB/FTTC/FTTH infrastructure installation had been completed:	FTTC: 1985 KVs FTTH: 37 KVs (4 KVs KALAMATA, 20 KVs LARISA, 13 KERAMEIKOS) FTTC-FTTH: 300,153 subscribers. FTTC AREAS: KALAMATA, ALMYROS, AKADHMIAS LAR, FILLELINON LAR, THOURIA, KALITHEA, PIRAEUS, NIKAI, KORYDALLOS, KERATSINI, AGIA VARVARA, HAIDARI, EGALEO, LARISA, PAVLOU MEL, THESS, NEA VARNA THESS, AMPELOKHPOI THESS, ILION, KERMEIKOS, KYPARISSIA, LOUTRAKI, MANDRA, NEA PERAMOS, RAFINA	
	E/M radiation & measurements	In 2020, measurements were carried out by WIND either in the context of the licensing of Base Stations or at the request of citizens:	In 2020, 10 E/M measurements were made at WIND stations either by the Victus laboratory or by University Institutions upon our assignment.

2020 Coverage maps



Promoting Sustainable Development

Internet of Things

We utilize the new IoT technologies aiming at offering products and valued added solutions that not only make the daily operations of businesses easier but also have a positive impact on society. These technologies apply to many different sectors of business activity while also creating a new business ecosystem. Some of applications of these technologies are Telemedicine, Retail Trade, Precision Agriculture, Smart Cities.

CLOUD Services

WIND Fleet Management

We have developed the innovative WIND Fleet Management service, offering the ability to companies, professionals, public organizations, private companies and institutes that manage vehicle fleets and means of transportation to reduce their operating costs, to better allocate their resources and to increase their safety and productivity by improving their operations and procedures. In this context, they achieve significant reduction in the carbon footprint of their business.

Wind Freeze Alert

We contribute to the smooth operation of health interest stores by offering the service to manage and monitor refrigerators, the WIND Freeze Alert service. The WIND Freeze Alert is a tool in the hands of every professional whose state of merchandise is of vital importance, a fact that makes it necessary in quality control management systems and for obtaining HACCP certification.

WIND MARKETapp

We have developed an innovative cloud application that enables a whole marketing segment through a web application. With MARKETapp, businessmen can grow their customer base, increase their profitability, reward their customer base and listen to their customers.

With respect for the environment

The packages used as well as the equipment are recyclable and bear the relevant CE marking and any additional certification required for their safe use by consumers, as required by the relevant Greek and European legislation. Moreover, we are improving the functionality, manageability, appearance, speed and tools of wind.gr to avoid calls and visits for information. Finally, we promote savings in paper for bills, envelopes etc with the use of the e-bill.

bility, appearance, speed and tools of wind.gr to avoid calls and visits for information. Finally, we promote savings in paper for bills, envelopes etc with the use of the e-bill.

Responsible Mobile Telephony Services

Protection of minors

With respect to the multimedia information services we strictly adhere to the regulations on the protection of minors while using their mobile phone. Regarding the 901 and 909 lines we have, as well as the five-digit SMS, the owner of the account (adult) can request with a phone call or written communication to be blocked.

Responsible Marketing

The programs we provide are in accordance with the regulations and optional rules on communication and marketing, aiming at the customer's complete information on the benefits of our products and services. Thus, we ensure that our communications and promotional material is consistent with the provisions of the Hellenic Code of Advertising - Communications (EKD-E), the provisions on unfair competition and consumer protection and the overall existing Greek legislation. We monitor and strictly adhere to the regulations/guidelines of the Hellenic Communications Control Council (S.E.E.). During 2019-2020, WIND Hellas was not the Telecommunications Company with the fewest appeals for communication issues. For two consecutive years, there were no complaints regarding anti-competitive behavior and violations of anti-trust and monopoly legislation.

Communication Principles

Our communication strategy is of major importance to all of us at WIND Hellas. In this context, driven by our commitment to the customer and the best possible subscriber service experience, we have established 3 basic communication principles that govern the way we operate:

Responsibility

The communication that is simple and understandable to all is of great importance to us and receives special attention. That is why we support distinct and transparent communication of products and services through every channel of promotion. Our websites (wind.gr, F2g.gr, myQ.gr), and our applications (myWIND app, myF2G app, myQ

app) are key channels of communication with consumers, making the process of obtaining information on our products and services easy, simple and fast.

In a further effort for the public to obtain information that is clear, correct and easy to understand, we use surveys of qualitative and quantitative nature.

Directness

We continue to invest in a 360-degree communication strategy, maintaining multiple channels of marketing and distribution of our products, selecting direct and clear ways of promotion. Being customer-focused, we continue to support the part of online communication and provide integrated online experience to all users through all means. We also offer instant service, fast access to information, as well as easy purchase of services and products through our e-shop (WIND eShop) and our Apps myWIND App, myF2G App and MyQ App.

Honesty

At WIND, our main focus is to ensure consistent communication with the principles of fair competition, complying with the Hellenic Advertising and Communication Code. Our goal is to build relationships of trust with existing and potential subscribers. This is why we invest in information

campaigns that gain public acceptance, explicitly reflect all product information and are not contrary to the Hellenic Advertising Code.

Code of Conduct

Our Company strictly adheres and binds third contractual parties to adhere to the Codes that have been issued by the Hellenic Telecommunications & Post Commission (EETT) and are related to consumer protection matters, namely:

- ▶ Code of Conduct for Providing Electronic Communication Services to Consumers (EETT Decision No. 488/82/30-7-2008), as in force.
- ▶ Code of Conduct for Providing Multimedia Information Services (EETT Decision No. 578/29/15.10.2010), as in force and as modified by Decision EETT 923/12/17.02.2020.

In addition, our Company fully applies and binds third contractual parties offering Multimedia Information Services on the application of the Codes related to child protection issues, namely:

- ▶ The Code of Conduct for value added services through mobile phones and the protection of underage users.
- ▶ European Memorandum on safer mobile use by children and adolescents, which has been signed and applied among Mobile Telephony Service Providers.



Intellectual Property - Copyright and Related Rights, Confidentiality of Communication and Personal Data

In every contract we sign with consumers we include strict conditions in relation to the protection of intellectual property and/or industrial property, prohibiting our subscribers to use our services in a manner that violates copyright laws under penalty of contract and service termination.

In addition, we have signed contracts and/or negotiated with the domestic Collective Intellectual and Related Rights Management Organizations regarding the payment of their entitlements depending on the activities of the Company, aiming to act together in order to inform and raise awareness of the general public regarding Internet piracy and the subsequent damage that the owners of copyrights suffer, which are internationally recognized as human rights.

Furthermore, we fully comply with our legal obligations as networks and electronic communication services providers in relation to safeguard the confidentiality of communications and personal data. In this direction, we have in place and implement a set of security rules in the form of policies and procedures.

Personal Data

Protecting the personal data of those who trust us is of vital importance to us. We abide by the legal framework and strictly apply the legal framework for the protection of privacy and personal data. To this end, we have taken the appropriate technical and organizational security measures. Also, we have implemented Personal Data Protection Policies and we have appointed internally a Personal Data Protection Officer pursuant to the General Data Protection Regulation (GDPR). At the same time, in 2020 we started designing and implementing a new software that will allow centralized management of processes related to personal data.

Furthermore, personal data collected are always appropriate and relevant and do not exceed what is required in view of the processing purposes for which they are intended, and they are updated, if necessary. At the same time, the relevant requests of our subscribers regarding the processing of their personal data by our Company are always satisfied immediately and by properly trained staff.

The Personal Data Protection Authority issued for our Company Decision No 38/2019 regarding the perfor-

mance of unsolicited telephone calls for the purpose of promoting products and services by cooperating companies (call center). This Decision is published on the Authority's website.

Customer Satisfaction

Improving the customer experience constitutes a point of differentiation, as well as a strategic priority of our Company at all levels and in each individual activity. Starting from the basic pillar of Customer Service, the approach to the customer has been redesigned as part of the wider Company culture change. The interdepartmental team Customer Xperience that was created continues through targeted actions to bring about significant results both to quantitative as well as qualitative indices.

Customer Satisfaction Survey CSAT

In the scope of reinforcing our customer-focused philosophy, we try to improve daily the procedure for recording the subscriber's service experience after completing the telephone communication with the Customer Service Department. Through this procedure we aim to ensure and improve the quality of offered services. The customer satisfaction survey (CSAT) continued in 2019-2020 and revealed the high level of interest and the Company's commitment toward its customers. The percentage of subscribers who responded to the question "How would you describe your overall experience from your Call Service?" that the telephone service they received from the Mobile & Fixed Telephony Customer Service Departments was "Excellent" and "Satisfactory" (CSAT), for 2019 was 81.97% and for 2020, 88.39%.

In addition, the NPS (Net Promoter Score) is evaluated, which exports the percentage of customers who are willing to offer the product or services they use to third parties, which for 2019 is 36.69% and for 2020 49.31%.

"Knowledge Base" Information Management Platform

Taking into account the constantly changing environment and the rapid developments in the telecommunications' sector, ensuring the daily and direct information of the Customer Service Department is considered necessary.

As part of the strengthening of Customer Experience and in conjunction with ensuring the timely and valid information of all Customer Service Departments, the new information platform/knowledge base called "SABIO" was put in place.

All customer contact points, inbound call centers, Back Office and Technical Support are updated by a common

platform, thus ensuring homogeneity in terms of service, communication and information to the customer. SABIO is a work tool that forms part of the work of operators and contains all the necessary information regarding:

- ▶ Products and Services of Mobile, Fixed and Combined Plans.
- ▶ Procedures followed by agents.
- ▶ System Manuals.

The main features of the platform are its analytical structure, its user-friendly look and feel environment which is similar to Google Chrome and Outlook and its fast search engine. In addition, SABIO is the first application in a cloud environment outside the Company. The total number of users is 1740 and the updates/instructions currently posted are 2060.



10 Principles of Transparency



1. Compliance with the health and safety legislation in the workspace

2. Equal pay

3. AAA Quality

4. Protection from forced labour and exploitation of employee behavior

5. Against child labour

6. Equal treatment

7. Information security

8. Freedom of association

9. Corporate responsibility

10. Protection of the environment

Responsible Procurements

Our relationships with suppliers are based on strictly professional criteria, through the implementation of specific procedures that aim to control, as far as possible, the reliability of our suppliers.

Using specific forms, general conditions of cooperation and/or other procedures, we expect any supplier who is interested in joining the list of suppliers that work with our Company to comply with the obligations relevant to its business activities arising from the national and European legislation and to avoid any unfair and unethical professional or business practice. According to the above, we expect our suppliers to meet the necessary conditions on the following topics:

In order to ensure the integrity of the operation of our Supply Chain, the transparency and the avoidance of any incidents of corruption, the selection and evaluation of our suppliers, the tenders and the daily procurement activities are carried out on the basis of detailed, documented and formal procedures that respect human rights and observe the principles of transparency by requiring specific procedures, controls and approvals.

Supplier rating

We try to constantly improve the effectiveness and efficiency of our supply chain by developing the quality characteristics of our supply base, evaluating our most critical and major suppliers and taking all the necessary measures where required.

In 2019 and in the context of promoting Corporate Responsibility in our supply chain, we sent the "Code of Con-

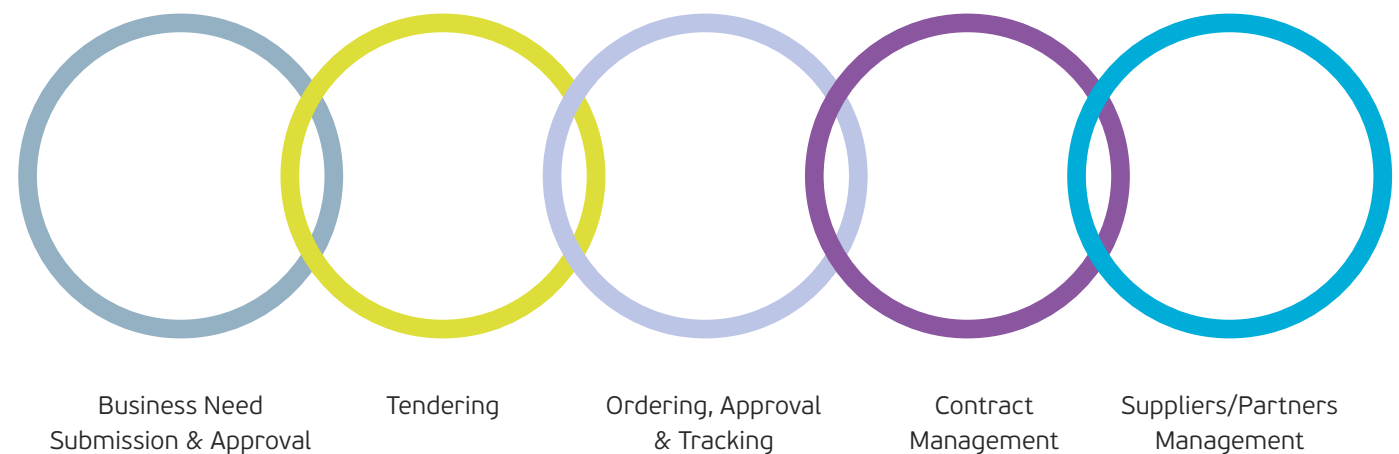
duct of WIND Hellas" to all new suppliers, having set as a necessary condition of cooperation the acceptance of the Code. In any case, the acceptance of the General Procurement Conditions, the Confidentiality Agreement and the Code of Conduct, as well as completing questionnaires related to the business activity, are just some of the main requirements for a new supplier to be included in our supply chain base.

We evaluate our suppliers in accordance with the requirements of the management systems under ISO 9001 and ISO 14001, monitor tenders and perform inspections when appropriate. In 2019, our 70 key suppliers were evaluated. Out of them, 58 suppliers were found to fully meet the corporate performance criteria, while in 12 cases further monitoring was found to be required, and thus we proceeded to all the necessary actions, taking all necessary measures.

Supporting the local community

We try to support the local markets mainly with respect to contractor/building projects, where we use companies of each region where possible, while with respect to purchasing promotional materials and printing work we always use Greek companies.

The percentage of spending on local suppliers (Greek companies) was about 92.4% and 93.4% of WIND's total expenditures for 2019 and 2020, respectively. The majority of spending on non-local suppliers, concerns purchases of telecommunications products for which there is no representation of the Company in Greece.



25 Goals for 2025 and the Sustainable Development

SUSTAINABLE OPERATION

≥ 90% expenditure to domestic suppliers

10% of WIND Stores to become Carbon Neutral

Use 100% green electrical energy through Guarantees of Origin and reduction of emissions from energy production by 10%

Compliance with SASB standard and other sustainability ratings

CORPORATE GOVERNANCE

35% of women in roles of responsibility

Participation of 100% of employees in awareness sessions regarding WIND Code of Ethics and Code of Conduct and related updates

Conduct compliance checks on personal data protection and publish relevant data protection guidelines

Update the Supplier Code of Conduct and incorporate Sustainability Assessment Criteria

SOCIETY

↑ 50% increase in awareness of kids@safety program

Provide equal digital access to the residents of remote areas

Empower women on enhancing skills through partnerships and initiatives to achieve their goals

400 hours of employee volunteering in social and environmental initiatives per year



100%

separation and treatment of biowaste in offices

Introduce Circular Economy initiative through leasing program for smartphones and other electrical equipment



Use of technological solutions

for the protection of the environment and biodiversity of Greece



Reduction of energy consumption in base stations and data centers by more than

10%



Reduction of fleet vehicle emissions by using hybrid cars by at least

10%

CUSTOMERS

↑ ≥ 80% Customer Satisfaction (CSAT)

Digital connectivity for all. Continue Optical Fiber and 5G mobile networks deployment with an investment of €500 million

with aim 90% of the population to cover by 2025



Keep customers informed and engaged for the 25 Goals for 2025

A digital network that promotes sustainability and the adoption of sustainable practices

Improved digital customer experience with integrated and secure communication services

EMPLOYEES

75% Employee engagement (based on surveys)

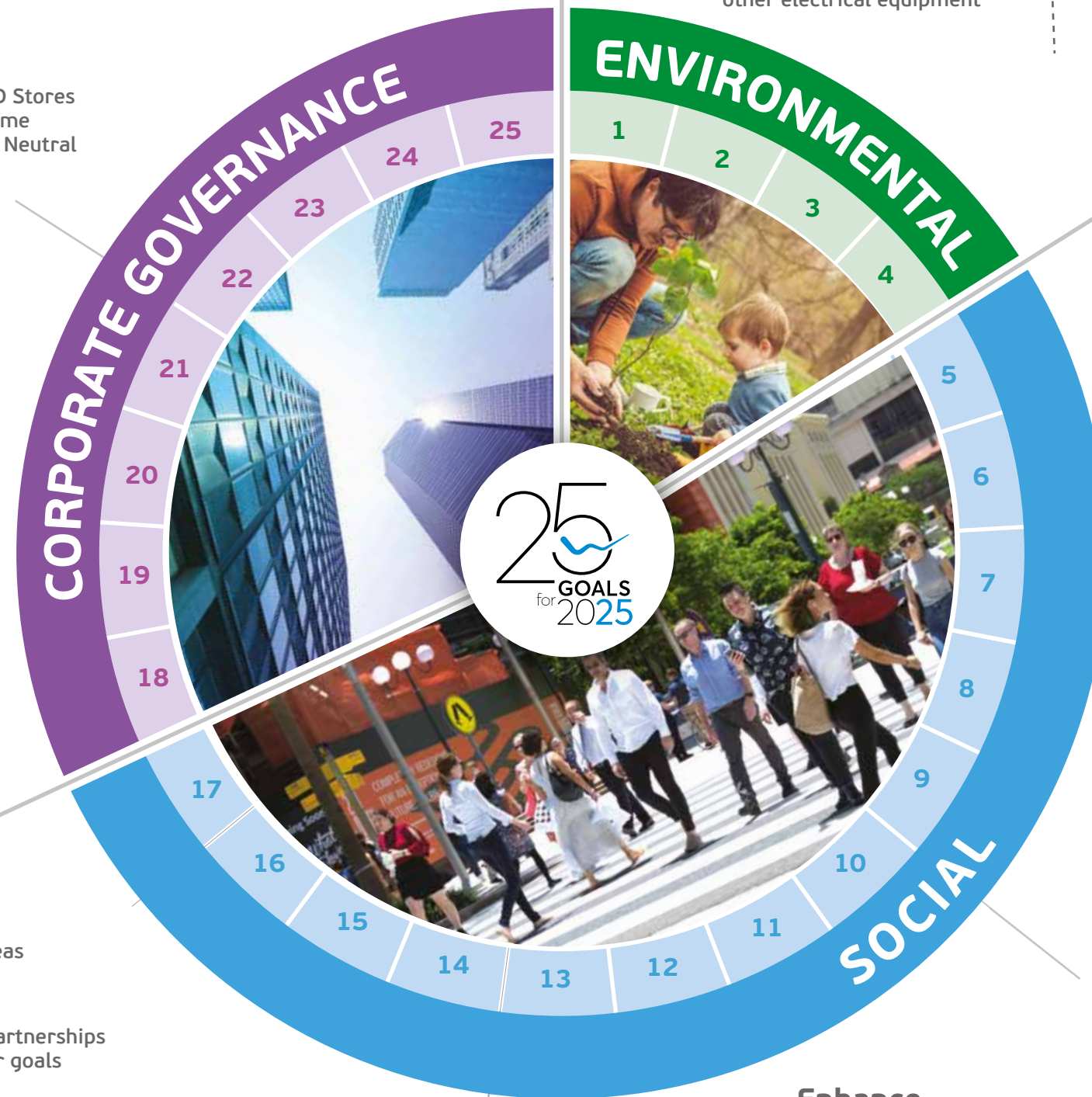
Flexible forms of work for 85% of employees

Participation and awareness of 100% of employees on sustainable development on an annual basis



#technologyforgood

Enhance and introduce new wellness programs





09

ABOUT THE SUSTAINABILITY REPORT

[75]

The biannual 2019-2020 Sustainability Report includes information regarding the Corporate Responsibility policies and programs by WIND Hellas. The Report focuses on our performance and actions developed to contribute towards sustainable development and entrepreneurship. Priorities remain the four axes: the Market, our People, the Environment and Society. This Report covers our activity for the year starting 1 January 2019 and ending 31 December 2020. This is the 13th consecutive Sustainability Report.

Our Sustainability Working Group comprises representatives from the Company's main departments, who collaborate to compile this Report as well as to collect all information contained herein. In some cases, there were corrections to data of previous years due to the different method of data calculation. The Report covers the period from January 1, 2019 to December 31, 2020. It is the 13th consecutive Corporate Responsibility Report - the first was published in 2008. This report is based on the international standards of GRI and SASB and covers all essential issues as recognized by WIND Hellas and its Stakeholders. The process of independent assurance has been carried out based on the standard AA1000AS v3, while at the same time there was a check of the accuracy of the data by the Internal Audit Department of the company. The content of the Sustainability Analysis, Principles and Objectives of Sustainable Development, as defined by the United Nations Global Compact and Agenda 2030 respectively, have been taken into account in determining the content. It is also noted that in 2020, WIND Hellas achieved the highest level of "Diamond" in the evaluation of the Corporate Responsibility Index (CR Index).

10

We promote the Sustainable Development Goals (SDGs)

In 2016 we adopted the United Nations agenda with the 17 Sustainable Development Goals (SDGs) by 2030 and are determined to contribute actively and effectively to promoting the well-being of society, fighting poverty and protecting the environment.

**ANNEX/
TABLES**

Taking into account the risks and opportunities that arise, our priority is to achieve objectives directly related to the activities and challenges of the industry, as well as to approach the substantive issues in a responsible manner.

The table below shows the correlation and practical adoption of the UN Sustainable Development Goals with our program and actions.

Correlation Table of the UN Sustainable Development Goals

Sustainable Development Goals	Important Issues	Objectives 2020	GRI STANDARDS Indicators
1 NO POVERTY 	<ul style="list-style-type: none"> Product quality. Support of local communities. 	<ul style="list-style-type: none"> Innovation indicator, strengthening the domestic supply market to boost the economy. 	GRI 202 GRI 413
2 ZERO HUNGER 	<ul style="list-style-type: none"> Presence on the local market. Product quality. 		GRI 203 GRI 204
3 GOOD HEALTH AND WELL-BEING 	<ul style="list-style-type: none"> Employee health & safety. Electromagnetic Radiation. 	<ul style="list-style-type: none"> Creating programs and activities that develop the physical and mental health of employees and their family - "euWIND". 	GRI 403
4 QUALITY EDUCATION 	<ul style="list-style-type: none"> Social benefits to employees. 	<ul style="list-style-type: none"> Extending flexible working hours. Skills training. Providing all employees with an educational program for sustainable development. 	GRI 401
5 GENDER EQUALITY 		<ul style="list-style-type: none"> More women in managerial positions. 	
6 CLEAN WATER AND SANITATION 	<ul style="list-style-type: none"> Employee health & safety. Environmental legislation. 		GRI 403 GRI 307
7 AFFORDABLE AND CLEAN ENERGY 	<ul style="list-style-type: none"> Energy consumption. Environmental legislation. 	<ul style="list-style-type: none"> Climate neutral WIND store. Energy checks on 100% of the facilities. 5% increase in energy efficiency in buildings. 	GRI 302 GRI 307
8 DECENT WORK AND ECONOMIC GROWTH 	<ul style="list-style-type: none"> Profitability. Social benefits to employees. 	<ul style="list-style-type: none"> Universal participation in annual employee opinion survey. 	GRI 102-8 GRI 102-41 GRI 201 GRI 401

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 	<ul style="list-style-type: none"> Product quality. Support of local communities. 	<ul style="list-style-type: none"> Kids@safety - Information Action increased penetration in children and parents. COMING CLOSE Program. 	GRI 413
10 REDUCED INEQUALITIES 	<ul style="list-style-type: none"> Support of local communities. 	<ul style="list-style-type: none"> Strengthening COMING CLOSE programs in order to have equal access to communication for all Greeks. Women in Managerial Positions. 	GRI 413
11 SUSTAINABLE CITIES AND COMMUNITIES 	<ul style="list-style-type: none"> Support of local communities. Presence on the local market. 	<ul style="list-style-type: none"> 5% increase in energy efficiency in buildings Waste recycling. 	GRI 202 GRI 413
12 RESPONSIBLE CONSUMPTION AND PRODUCTION 	<ul style="list-style-type: none"> Corporate Responsibility Report. 	<ul style="list-style-type: none"> Saving paper from our digital services. Waste recycling. 	GRI Table
13 CLIMATE ACTION 	<ul style="list-style-type: none"> Energy consumption. Greenhouse gas emissions. Environmental compliance. 	<ul style="list-style-type: none"> Performing energy audits in all our facilities to increase energy efficiency. Reduce greenhouse emissions from the operation of our offices. Creating a climate-neutral certified store. 	GRI 302 GRI 305 GRI 307
14 LIFE BELOW WATER 	<ul style="list-style-type: none"> Environmental legislation. 		GRI 307
15 LIFE ON LAND 	<ul style="list-style-type: none"> Electromagnetic Radiation. 	<ul style="list-style-type: none"> Waste recycling. 	
16 PEACE, JUSTICE AND STRONG INSTITUTIONS 	<ul style="list-style-type: none"> UN Global Compact. 	<ul style="list-style-type: none"> Corporate Responsibility Strategy 2020. 	GRI 102-12 GRI 102-16
17 PARTNERSHIPS FOR THE GOALS 	<ul style="list-style-type: none"> Participation in unions / organizations. Sustainability Report. 	<ul style="list-style-type: none"> Continuous information program in shops on the 2020 objectives and annual progress. 	GRI 102-13

TABLE Sustainability Accounting Standards Board (SASB)

This sustainability report incorporates for the first time the Sustainability Accounting Board (SASB) standards for the telecommunications industry. SASB is an independent organization that provides standards for the disclosure of the most relevant ESG (Environmental, Social, Governance) information. We are committed to providing our stakeholders with accurate, high-quality information.

SASB Code	Activity Metric	
Carbon footprint and operation		
TC-TL-130a.1.	(1) Total energy consumption, (2) percentage of electricity from the grid, (3) percentage of energy from renewable sources:	2019: (1) 401,583 GJ (2) ~89% (3) 0% 2020: (1) 440,184 GJ 2.90 (3) 0%
Data Privacy		
TC-TL-220a.1.	Description of policies and practices related to advertising and protection of customer privacy:	The Company strictly applies a broad framework of technical measures and Security Policies, approved by the Data Protection Authority (DPA) and the Hellenic Authority for Communication Security and Privacy (ADAE).
TC-TL-220a.2.	Number of customers whose information is used for secondary purposes:	The Company processes the data of its customers exclusively for purposes related to its business. The number is confidential and cannot be disclosed.
TC-TL-220a.3.	Total amount of monetary losses as a result of legal proceedings related to customer confidentiality issues:	The Personal Data Protection Authority issued for the Company Decision No 38/2019 regarding the performance of unsolicited telephone calls for the purpose of promoting products and services by cooperating companies (call center), imposing a fine of €20,000. This Decision is published on the Authority's website.
TC-TL-220a.4.	(1) Number of law enforcement requests for customers' information, (2) number of customers whose information was requested, (3) rate of information disclosed:	The number is confidential and cannot be disclosed.
Data Security		
TC-TL-230a.1.	(1) Number of data breaches, (2) percentage of those involving personally identifiable information (PII), (3) number of customers affected:	The Company maintains the strictest policies to ensure the security and integrity of the personal data of its Customers and takes all necessary measures to ensure the protection of their personal data and transparent processing always in accordance with the requirements of the legislative framework. If we identify a data breach, we will notify affected consumers and the relevant authorities as required by applicable law.
TC-TL-230a.2.	Description of the approach to identifying and addressing data security risks, including the use of international cybersecurity standards:	The Company strictly applies a broad framework of technical measures and Security Policies, approved by the Data Protection Authority (DPA) and the Hellenic Authority for Communication Security and Privacy (ADAE).

End-of-life management		
TC-TL-440a.1.	(1) Materials recovered through return programs, percentage of recovered materials that were (2) reused, (3) recycled, and (4) landfilled:	As a Producer (pursuant to Law 2939/2001) WIND Hellas participates in the competent Collective Management System (Appliances Recycling S.A.). Sales-based contributions are paid to the System for all items placed on the market for the purpose of collecting them after use and reusing or recycling them. Due to the single WEEE stream, it is not possible to estimate the quantities of WIND Hellas waste that are recycled. Of the waste generated, 100% of the hazardous and 100% of the special streams (WEEE, Waste Oils and CD&E Waste) are sent for recycling as set out by law. As regards other waste, landfill disposal was 2% in 2019 and 20% in 2020 (due to non-recyclable items such as furniture). The remaining percentage is sent to recycling. Items in good condition (equipment, furniture, spare promotional materials, t-shirts, etc.) are donated.
Competitive Behavior and the Open Internet		
TC-TL-520a.1.	Total amount of monetary losses as a result of legal proceedings related to anticompetitive conduct regulations:	During the period 2019-2020 there were no incidents of anti-competitive behaviour, and therefore there were no related losses.
TC-TL-520a.2.	Average actual constant download speed of (1) company-owned and related content and (2) other non-related content:	The Company treats all traffic equally, without exclusions, restrictions or interference and regardless of the sender and the recipient, the content accessed or distributed, the applications or services used or provided, or the terminal equipment used. The Company does not apply traffic management measures, beyond those reasonable, unless this is necessary and only for as long as necessary in order to: a) comply with the legal and regulatory framework, b) ensure the integrity and security of the network, c) prevent disruptions due to network congestion.
TC-TL-520a.3.	Description of the risks and opportunities associated with network neutrality, zero billing, paid peering and other related practices:	Information regarding the open internet, as well as technical details regarding the quality of services, quality parameters, traffic management measures, can be found on the Company's website: https://www.wind.gr/gr/netneutrality/
Managing systemic risks from technological disruptions		
TC-TL-550a.1.	(1) average frequency of system outages and (2) average duration of outage per customer:	1) 2019 0.108 2020 0.041 (2) 2019 0.004 2020 0.012 The data provided is for the fixed network. For mobile, WIND Hellas does not currently calculate and report metrics relating to the frequency and duration of system interruption in the manner specified by the standard. However, metrics we use to monitor our network performance are available and can be provided if needed upon request.
TC-TL-550a.2.	Description of systems to ensure uninterrupted service during service disruptions:	At WIND Hellas we recognize and accept the necessity and responsibility for the creation and adoption of a Business Continuity Management framework, which we have developed in accordance with the international standard ISO 22301:2019 – Societal security – Business Continuity Management System – Requirements, and the regulatory obligations governing the Greek market, while at the same time we honor our commitment to our customers, employees, shareholders and suppliers. In this context, WIND has been certified with the aforementioned international standard ISO 22301:2019 since April 2017 in order to continue all our critical operations and to provide uninterrupted to our customers the critical services, in case of an event which could negatively impact important business units, systems, and services. For this reason, we have developed a Business Continuity Management system in the framework of which we have set and prioritized the critical functions, activities, infrastructures, services of our Company, as well as the resources that can be activated at any time. In addition, we have identified and assessed any operational risks and taken all necessary measures to mitigate their impact on WIND's daily operations, implementing strategies and solutions that enhance the resilience of the organization. At the same time, we continuously develop, implement, test, maintain and monitor these Business Continuity, Crisis Management and Communication

Table of Materiality Key Issues and Limits

The handling of Materiality Key Issues of WIND Hellas is influenced both by the Company and by its other stakeholders, inside and outside the Company.

This Report and the data describing our performance on the materiality key issues cover all activities of WIND Hellas.

Materiality Key Issues	Limits within the company	Limits outside the Company
Protection of personal data	WIND Hellas Shareholders Commercial Network	Regulatory Authorities NGOs/Citizen Organizations Central Government/Local Government Customers (Individuals - Businesses) Academic Community Media
Employee health & safety	WIND Hellas Employees Shareholders Commercial Network	NGOs/Citizen Organizations Media
Environmental legislation	WIND Hellas	NGOs/Citizen Organizations Central Government/Local Government Academic Community Media
Social benefits of employees	WIND Hellas Employees Commercial Network	Media
Competition legislation	WIND Hellas Shareholders Commercial Network	Regulatory Authorities NGOs/Citizen Organizations Central Government/Local Government Media Suppliers
Waste management	WIND Hellas Commercial Network	NGOs/Citizen Organizations Central Government/Local Government Media
Network investments	WIND Hellas Shareholders Commercial Network	Regulatory Authorities Central Government/Local Government Customers (Individuals - Businesses) Media Suppliers
Electromagnetic Radiation	WIND Hellas	Regulatory Authorities NGOs/Citizen Organizations Central Government/Local Government Academic Community Media

Safe use of new technologies	WIND Hellas Employees Commercial Network	Regulatory Authorities NGOs/Citizen Organizations Central Government/Local Government Customers (Individuals - Businesses) Academic Community Media
Confidentiality of communication	WIND Hellas Shareholders Commercial Network	Regulatory Authorities NGOs/Citizen Organizations Central Government/Local Government Customers (Individuals - Businesses) Academic Community Media
Anti-Corruption	WIND Hellas Shareholders Commercial Network	Regulatory Authorities NGOs/Citizen Organizations Central Government/Local Government Customers (Individuals - Businesses) Academic Community Media
Discrimination	WIND Hellas Employees Commercial Network	NGOs/Citizen Organizations Media
Diversity and equal opportunities	WIND Hellas Employees Commercial Network	NGOs/Citizen Organizations Media
Quality of services	WIND Hellas Employees Commercial Network	Customers (Individuals - Businesses) Media
Indirect social impacts	WIND Hellas	NGOs/Citizen Organizations Central Government/Local Government Media
Profitability	WIND Hellas Shareholders	Media
Procurement Practices	WIND Hellas Commercial Network	Customers (Individuals - Businesses) Suppliers

GRI TABLE “in accordance - Core”

This Sustainability Report is the thirteenth edition of WIND Hellas and covers the actions and activities implemented by the Company in 2019 and 2020. The Center for Sustainability and Excellence, following its evaluation according to the most valid and strict international GRI STANDARDS guidelines, confirms that it is at the level of compliance “In accordance - Core”.

GRI Standards index	Description	Reference
General information		
Company Profile		
GRI 102-1	Name of the Company	WIND Hellas Telecommunications S.A.
GRI 102-2	Main brand names, products and services	p. 6-7
GRI 102-3	Location of the Company's headquarters	Leof. Athinon 106, Athina 104 42
GRI 102-4	Countries in which the Company operates	p. 6
GRI 102-5	Status of ownership and legal form	Société Anonyme (S.A.)
GRI 102-6	Markets served	p. 6-7
GRI 102-7	Figures of the Company issuing the Report	p. 8, 39-40
GRI 102-8	Labor force data by age group, gender, age group, mobility and other differentiation indicators	p. 39-40
GRI 102-9	Description of the Company's supply chain	p. 71
GRI 102-10	Significant changes in the Company and in the supply chain	Moving and renovating our offices in L. Athinon and Paiania
GRI 102-11	Explanations on the implementation of the precautionary principle	p. 22-29
GRI 102-12	External initiatives	p. 32-35
GRI 102-13	Membership of associations	p. 8
Strategy		
GRI 102-14	Statement from senior decision-maker	p. 3
Ethics and integrity		
GRI 102-16	Values, principles, standards and norms of behavior	p. 14-15
Governance		
GRI 102-18	Governance Structure	p. 24
Stakeholder Engagement		
GRI 102-40	List of stakeholder group	p. 17
GRI 102-41	Collective bargaining agreement	p. 40
GRI 102-42	Identifying and selecting stakeholders	p. 16
GRI 102-43	Approach to stakeholder engagement	p. 17
GRI 102-44	Key topics and concerns raised	p. 17

Reporting Practices		
GRI 102-45	Entities included in the consolidated financial statements	p. 8
GRI 102-46	Defining report content and topic Boundaries	p. 18-19
GRI 102-47	List of material topics	p. 18
GRI 102-48	Restatements of information	There were no restatements of information
GRI 102-49	Changes in Reporting	There were no significant changes
GRI 102-50	Reporting Period	01/01/2019 – 31/12/2020
GRI 102-51	Date of more recent report	2018 Sustainability Report
GRI 102-52	Reporting Cycle	Biennial
GRI 102-53	Contact point for questions regarding the report	Back cover
GRI 102-54	Claims of reporting in accordance with the GRI Standards	p. 84
GRI 102-55	GRI Table	p. 84-85
GRI 102-56	External assurance	p. 90-92
Specific Disclosures		
Economy		
GRI 201	Economic Performance	
GRI 103	Management Approach	p. 8
GRI 201-1	Direct Economic value Generated and Distributed	p. 8
GRI 203	Indirect Economic Impacts	
GRI 103	Management Approach	p. 31
GRI 203-1	Infrastructure investments and services supported	p. 32-35
GRI 204	Procurement Practices	
GRI 103	Management Approach	p. 71
GRI 204-1	Proportion on spending on local suppliers	p. 71
GRI 205	Anti-corruption	
GRI 103	Management Approach	p. 27
GRI 205-3	Confirmed corruption incidents and actions implemented	p. 27
GRI 206	Anti-competitive behavior	
GRI 103	Management Approach	p. 66-67
GRI 206-1	Legal actions for anti-competitive behavior, anti-trust and monopoly practices	p. 66
Environment		
GRI 306	Effluents and waste	
GRI 103	Management Approach	p. 57
GRI 306-2	Waste by type and disposal method	p. 58
GRI 307	Environmental compliance	
GRI 103	Management Approach	p. 66
GRI 307-1	Non-compliance with environmental laws and regulations	p. 53

Employees - Society		
GRI 401	Employment	
GRI 103	Management Approach	p. 41
GRI 401-2	Benefits provided to full-time employees and not provided to part-time or seasonal workers	p. 41
GRI 401-3	Parental leave	p. 43
GRI 403	Occupational health & safety	
GRI 103	Management Approach	p. 42
GRI 403-1	Occupational health and safety management system	p. 42-43
GRI 403-2	Hazard identification, risk assessment, and incident investigation	p. 42-43
GRI 403-3	Occupational health services	p. 42-43
GRI 403-4	Worker participation, consultation, and communication on occupational health and safety	p. 42-43
GRI 403-5	Worker training on occupational health and safety	p. 42-43
GRI 403-6	Promoting worker health	p. 42-43
GRI 403-7	Preventing and mitigation of occupational health and safety impacts directly linked by business relationships	p. 42-43
GRI 403-9	Work-related injuries	p. 42
GRI 405	Diversity and equal opportunities	
GRI 103	Management Approach	p. 41
GRI 405-1	Diversity of governance bodies and employees	p. 39
GRI 406	Non-discrimination	
GRI 103	Management Approach	p. 27
GRI 406-1	Incidents of discrimination and corrective actions taken	p. 27
GRI 418	Customer Privacy	
GRI 103	Management Approach	p. 68
GRI 418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	p. 68
Non-GRI	Electromagnetic Radiation	
GRI 103	Management Approach	p. 56
Non-GRI	Confidentiality of communication	
GRI 103	Management Approach	p. 68
Non-GRI	Safe use of new technologies	
GRI 103	Management Approach	p. 32
Non-GRI	Quality of services	
GRI 103	Management Approach	p. 28-29, 70
Non-GRI	Network investments	
GRI 103	Management Approach	p. 64-65

This Sustainability Report has been produced in collaboration with the Center for Sustainability and Excellence.



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EXTERNAL ASSURANCE REPORT

This External Assurance report was conducted by CSE North America on behalf of WIND Hellas and its Sustainability Report 2019-2020 for the period 1/1/2019 to 31/12/2020. The goal of the process is to provide assurance towards the stakeholders of WIND Hellas for the accuracy, reliability, and objectivity of the information in the Sustainability Report, as well as that the report covers all the material issues, as identified by WIND Hellas and its stakeholders.

Scope & Methodology

The Sustainability Report has been conducted according to GRI standards (core), and, for the first time, according to SASB Standards for Telecommunication Sector.

- ▶ The Report covers all material issues as identified by WIND Hellas and its stakeholders.
- ▶ External assurance process applied was AA1000AS v3 standard with an agreed-on 'Type 2 (moderate)' Scope
 - Type 2 requires assessment of organization's adherence with all four AA1000AS Principles (Inclusivity, Materiality, Responsiveness, Impact), and shall additionally assess and evidence the reliability and quality of specified sustainability performance and disclosed information, providing relevant findings and conclusions, i.e., assurance on reliability and quality.
 - CSE's applied assurance methodology followed Type 2 standard with sample analysis and review of processes related with/to:
 - identifying/communicating with key stakeholder groups.
 - identifying and defining material issues.
 - key performance indicators (except for reviewing/verification of the operational efficiency of data collection and computation systems that were used to collect and process the data).
 - review of information and claims included in the Sustainability Report.
 - review concerning compliance with GRI and SASB Standards.

General Conclusions

Based on the scope of the assurance, it was observed that:

- ▶ The description of WIND Hellas activities and performance during 2019 and 2020, as well as the way they have been presented in the Sustainability Report, is accurate.
- ▶ WIND Hellas complies with the principles of inclusivity, materiality, responsiveness, and impact, as defined in the AA1000AS v3.

In cases of any differences between the English and Greek version of the Sustainability Report, the English version prevails with respect to our conclusions.

Key Observations and Recommendations

WIND Hellas recorded significant improvements in the management and performance in corporate responsibility and sustainability during the period covered by the Sustainability Report:

- ▶ The performance made on the goals that were set in 2016 for 2020, especially during the challenging COVID-19 conditions.
- ▶ The Company's new Sustainability Strategy and goals for 2025.
- ▶ The Diamond distinction awarded by the National Corporate Responsibility Index.
- ▶ The constant improvement of the environmental performance, as expressed through its energy consumption reductions, through efficiency improving projects in buildings and equipment, as well as the waste management practices.

Based on our observations during the assurance process, our key recommendations are:

- ▶ With respect to the principle of inclusivity, WIND Hellas must maintain and aim at further developing the existing model of engaging and communicating with its stakeholders.
- ▶ With respect to the principle of materiality, WIND Hellas must maintain the existing processes for the identification and prioritization of its material issues. At the same time WIND Hellas should aim to further expand the process, for example through the increase of the stakeholder groups involved in the process.
- ▶ With respect to the principle of responsiveness, WIND Hellas should maintain and further enhance its approach about the incorporation of stakeholder expectations and concerns into WIND Hellas products, services and the initiatives it develops.
- ▶ Given the ever-increasing importance of managing a sustainable supply chain, WIND Hellas must maintain and continue strengthening its sustainability policy regarding its supply chain.
- ▶ WIND Hellas must maintain and continue enhancing its environmental initiatives, which are part of its long-term commitment towards environmental protection.

Findings and Conclusions Regarding the Principles

- ▶ **Inclusivity** – how the stakeholder groups have been identified, and how WIND Hellas communicated with them regarding sustainability. The communication activities with the stakeholder groups include all key stakeholder groups of WIND Hellas. Also, WIND Hellas has implemented the appropriate principles in the development of its approach towards sustainable development.
- ▶ **Materiality** – how WIND Hellas determines the importance for the selection of the material sustainability issues. The process of determining the material issues by WIND Hellas provides a balanced representation of the material issues based on its sustainability performance.
- ▶ **Responsiveness** – how WIND Hellas responded to the issues set by the stakeholders and how this process is described within the Sustainability Report. WIND Hellas has implemented the principle of responsiveness during the selection of the issues included in the report. At the same time, its sustainability strategy responds to the concerns of the stakeholders, and to the long-term commitment towards corporate responsibility.
- ▶ **Impact** – how WIND Hellas monitors, measures, and is accountable for its impacts on the broader ecosystem. WIND Hellas has identified all key sustainability issues and has reported on them using the GRI Standards and SASB Standards. At the same time, WIND Hellas's long-term strategy and goals respond to both the short-term impacts and long-term impacts and aim at adoption and mitigation. As stated in the Sustainability Report there is major potential for improvement through WIND Hellas's communication technology for daily operations of businesses and positive impacts on society. Future Sustainability Reports could assess and quantify that impact in terms of GHG emission reduction potential (e.g., precision agriculture, smart cities, telemedicine).
- ▶ **Specific Performance Information.** The Specific Performance Information (quantitative data related to GRI and SASB metrics and indicators) has been collected and presented in a commonly accepted manner in Sustainability Report and the 'general and specific disclosures' have been reviewed during the assurance process. During the assurance process the following metrics and information were reviewed:
 - General disclosures about WIND Hellas profile, its strategy, its ethics and integrity, its corporate governance, its engagement with stakeholders and its reporting practices.

- Specific Disclosures about:
 - Greenhouse gas emissions and their reduction.
 - Energy consumption, intensity, and reduction.
 - Electromagnetic radiation and the recognition and mitigation of impacts to the local communities.
 - Production and management of waste.
 - Other emissions for WIND Hellas operations.
 - Statements regarding compliance to environmental laws and regulations.
 - Benefits provided to full-time employees.
 - Occupational health and safety.
 - Employment records.
 - Policies and incidents regarding corruption.
 - Statements regarding compliance to anti-competitive behavior laws and regulations.
 - Practices regarding customer data and privacy.
 - Employee training.
 - Supply chain characteristics.
 - Selection and evaluation of suppliers.
 - Records about diversity, non-discrimination, and equal opportunities. The incorporation of the UN Sustainable Development Goals in the Sustainability Report.

Exceptions and Limitations

The assurance process did not include information related to:

- ▶ Activities outside the reporting period.
- ▶ Statements about the position, policies, and principles of WIND Hellas.
- ▶ Financial information.
- ▶ Content of other documents, reports and/or corporate websites.

Responsibilities of WIND Hellas and the Assurance Provider

The preparation, presentation, and the content of the online versions of the Sustainability Report is the responsibility of WIND Hellas. The responsibility of CSE North America lies in providing an independent assurance to the stakeholders for the accuracy, reliability and objec-

tivity of the information included in the report, as well as to express its overall opinion based on the type of engagement, as defined by the present report.

CSE North America recognizes the need for a detailed, transparent assurance process to ensure reliability and to operate as a means to improve the performance of WIND Hellas about its strategy for sustainability, as well as its Sustainability Reports.

CSE North America verifies that it kept its independence and objectiveness, and that, in general, there were no incidents and service provided that could affect CSE North America's independence and objectiveness. CSE North America has extensive knowledge on reviewing and evaluating issues and systems regarding sustainability.

On behalf of CSE North America

Thomas Weber



Photography

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Thank you for reading this report.
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