OTE
GROUP OF COMPANIES

**Supplementary
Sustainability
Information**

2024

CONTENTS

Introduction

This document provides supplementary information on sustainability matters and is intended to be read alongside the Sustainability Statement 2024, as included in the OTE Group Annual Financial Report 2024, and other publicly available materials.

Its primary purpose is to enhance clarity and transparency on OTE Group's sustainability efforts, particularly for external ESG rating agencies seeking a more in-depth view of the Group's practices, progress, and strategic priorities in the field of sustainability.

The content consolidates relevant information by referencing existing publications. Additionally, it includes supplementary data, deemed important for offering a more comprehensive and transparent overview of OTE Group's sustainability-related activities. Where applicable, assurance levels can be verified by referring to the original documents.

This document covers the period from January 1 to December 31, 2024, and is prepared on a consolidated basis for OTE S.A. and its subsidiaries, aligning with the financial reporting scope unless otherwise indicated.

General Information

Memberships

OTE Group companies actively participate in associations and are informed about the trends and developments on Corporate Responsibility and Sustainability issues. In 2024, OTE Group companies maintained their voluntary participation, through their membership in several strategically important national and international bodies.

OTE Group is amongst other, a member of:

- The United Nations Global Compact.

- The Hellenic Network for Corporate Social Responsibility (CSR Hellas).

- The Federation of Hellenic Enterprises (SEV) Council for Sustainable Development.

- Greek Diversity Charter.

- Transparency International Greece.

- Connect Europe.

In 2024, the Group participated in a number of sustainability-related working groups, taskforces, fora and events, some of them presented below:

- Hellenic Pact for Sustainable Industry, of the CSR Hellas.

- Connect Europe Working Group for Sustainability.

- Business & Human Rights, Climate Ambition, and Target Gender Equality Accelerators by the UN Global Compact.

- Women in Business (WIB) Committee, of the American Hellenic Chamber of Commerce.

- Circular Economy Committee, of the American Hellenic Chamber of Commerce.

- Corporate Governance Committee, of the American Hellenic Chamber of Commerce.

Environment

OTE Group is committed to integrating sustainability across its value chain, thus contributing to addressing environmental challenges such as climate change and overconsumption of natural resources. In this context, the OTE Group's environmental strategic priorities, aligned with the ones of DT Group and taking into consideration the materiality analysis results, are: Climate Neutrality and Circular Economy throughout the value chain.

To achieve this, OTE Group is committed to:

- The minimization of the environmental impacts from its activities across its value chain.

- The development and provision of products and services that enable protection of the environment and increase productivity in other sectors of economic activity.

- Raising its stakeholders' awareness on acting more responsibly on all aspects of environmental protection.

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

- Analyze environmental risks and opportunities.

- Monitor environmental performance in a timely and transparent manner.

- Address climate change through energy efficiency improvements and Renewable Energy Sources.

- Enable the electrification of its transportation activities, considering the maturity of the market and the technology, as well as the availability of vehicle charging infrastructure.

- Renovate buildings with a view to maximizing value by improving energy and environmental performance and addressing health, safety and wellness of employees.

- Integrate the principles of circular economy into its activities to improve resources efficiency in own operations but also on upstream (suppliers) and downstream (customers) activities.

- Recycle the majority of the waste generated.

- Increase the lifetime and decrease the footprint of the products sold/leased to customers while ensuring recycling at the end of their lifetime.

- Develop specialized ICT products and services that meet customers' needs while contributing to environmental protection.

- Ensure that the levels of electromagnetic fields of its base stations comply with the public exposure safety limits.

- Develop awareness initiatives for its stakeholders and implement environmental sponsorship programs through strategic partnerships.

- Contribute to the development of public policy, autonomously or as a member of DT Group, either directly through the official EU or national public consultation processes or through the trade associations in which OTE participates. The scope of its involvement is to contribute to the development of a favoring framework for the transition to a green and digital economy in line with EU Green Deal and international treaties and targets, while considering national and company specific circumstances.

- Contribute / participate, autonomously or as a member of DT Group, in initiatives addressing sustainability and climate change (e.g., UN Global Compact, RE100, Race to Zero campaign)

- Secure high ratings by international sustainability and SRI analysts.

Environmental protection expenditures for 2024 amounted to more than €1 million and cover waste treatment, management and disposal, environmental impact assessment studies, external certification of environmental management systems and measurements on electromagnetic fields. In 2024, no significant fines and non-monetary sanction related to the environment were imposed.

The sustainability governance structure, but also the established procedures in the context of the integrated management system ensure the consistency between the OTE Group engagement with stakeholders including policy

makers (e.g., in the context of public consultation processes), trade associations, etc., and its sustainability strategy and commitments. More information about the Sustainability Governance are available on the Sustainability Statement.

1. Energy and Climate Change

This section contains information complementary to the Sustainability Statement.

<u>*Energy Efficiency*</u>

Improving energy efficiency is a core element of OTE Group strategy towards a sustainable operation as it allows for controlling energy consumption while data traffic increases, managing energy costs and reducing exposure to changing fuel / carbon prices.

In 2024, the energy efficiency projects implemented resulted in an energy conservation of 14.8 GWh (~3% of energy consumption in 2024), while avoided GHG emissions are estimated at 5 kt CO_2 eq.

As a result of the measures implemented, total energy consumption per volume of data transferred improved by about 22% compared to 2023, reaching a value of 37 kWh/TB in 2024. The data traffic emissions intensity (scope 1 and 2 emissions, market-based that is including the effect of the GOs secured) reached a value of 1.5 kg CO_2 eq/TB (from 2.0 kg CO_2 eq/TB in 2023). Energy and GHG emissions intensities (i.e., per revenues) have also improved (by about 7% and 10% respectively compared to 2023).

Telecom networks. Measures to increase energy efficiency in telecom networks aim at the transition to a more energy efficient network and include, among others:

- Legacy Telecom Power off.

- Telecom Rooms Consolidation: Reducing telecom space in buildings thus reducing cooling consumption and optimizing Power Usage Efficiency.

- Cooling Optimization (e.g., free-cooling installation, replacing air-condition units with more efficient, increasing set point).

- Mobile Power Saving Features based on telecom equipment parameters and AI, contribute significantly to energy savings. The feature predicts network traffic with the support of AI models and locks capacity cells during the low traffic period.

- UPS efficiency improvement.

Emphasis is also given to the electricity generators, especially those covering the needs of stand-alone base stations (24-hour operation). Grid connection is ongoing, while an annual maintenance program is in place.

Data centers. Efforts to improve efficiency are on-going as this would compensate for the increasing load. Emphasis is given to the proper use and the efficient operation of the equipment installed. Electricity consumption of OTE Group data centers is covered by GOs and therefore their scope 2 emissions are zero (market-based).

Measures implemented address, as appropriate, IT equipment (consolidation, virtualization, rack orientation, etc.), but also sites infrastructure (UPS systems, HVAC systems, automation and BMS systems) and cabling infrastructure. With respect to the cooling infrastructure, provisions of regulations on fluorinated greenhouse gases are applied, and monitoring and maintenance programs are in place.

The Power Usage Effectiveness (PUE) metric is monitored as an indicator for energy-efficiency enhancements in OTE Group data centers. PUE is determined, according to the standard EN50600 for data centers, as the ratio of the total energy consumed by data centers over the amount of electrical energy consumed by the IT equipment. Overall efficiency is improving as the quotient decreases towards 1.0. The average PUE value for OTE Group data centers is 1.9 in 2024, while an average value of 2.0 is reported for Southern Europe.

Buildings and Stores. Renovations and day-to-day operation are carried out in such a way as to reduce energy consumption and GHG emissions. An Energy Management System certified according to ISO 50001 standard (Greece only) is in place. Energy Audits are performed to detect the measures that should be taken in order to improve the energy performance of buildings or of the equipment installed.

Five OTE Group buildings have already received LEED environmental certifications (GOLD level) & one building has received Building Research Establishment Environmental Assessment Method (BREEAM) (good level). The certification of two other iconic buildings (OTE Headquarters and NYMA), is on the way. In 2024, one office building of OTE Group at Thessaloniki, with a total built-up area of 2.000 m², was renovated in accordance with international standards and is planned to receive LEED environmental certification (GOLD level). Additionally, stores are renovated with recyclable and environmentally friendly materials and equipment to improve energy performance and reduce emissions while enhancing customers' awareness.

Some indicative measures implemented in the OTE Headquarters and other renovated buildings that have a positive energy impact are the following:

- Buildings envelope energy upgrade.

- Modernization of HVAC (Heating, Ventilation and Air Conditioning) systems improving energy efficiency.

- Energy planning for buildings and selection of energy efficient E/M equipment.

- Installation of LED lighting systems.

- Installation of smart metering devices and automation in lighting, air-conditioning, generators and other systems for better supervision and improvement of operational efficiency.

- Installation of BEM (Building Energy Management) systems in critical sites.

Road transportation. OTE Group conducts a comprehensive plan for the transformation of its fleet vehicles towards sustainability, consistent with sectoral and national adaptation plans and strategies in the areas of vehicle electrification and charging infrastructures. In this context, henceforth at every vehicle tender pursued, the procurement of zero emissions vehicles, such as specifically battery electric vehicles (BEV) being powered by electricity from renewable energy sources prevails.

By the end of 2022, more than 300 corporate vehicles have been replaced by plug-in hybrid electric vehicles (PHEV). In continuation of this transition, 38 battery electric vehicles were leased in Greece by the end of 2023. Further reinforcing the commitment to green transportation, a total of 785 BEVs were leased in Greece by the end of 2024.

In parallel a corporate charging network at the OTE Group's facilities is being developed, so that all vehicles can be charged. There is also provision for additional parking spaces for vehicle charging for the visitors of the Group facilities. By 2023, the construction of 218 charging stations at the Group's buildings/facilities completed. The installation of an additional 408 charging stations has been completed during 2024.

Renewable Energy Sources

OTE Group considers Renewable Energy Sources (RES) a key tool for the decarbonization of its operations and all available options (guarantees of origin, purchasing power agreements, self-generation) for sourcing "green" electricity are examined. 2024 electricity consumption in all sites with full control on the selection of electricity suppliers is fully sourced from RES. PPAs (backed by GOs) account for 12% of electricity consumption, while the rest 88% is covered by GOs.

In Greece, RES electricity generation (autonomous photovoltaic units in 67 base stations, small wind turbine system in 1 base station) increased to about 544 MWh in 2024. A photovoltaic unit in OTE Headquarters building with an installed capacity of 600kWp is expected to become operational in 2025. Other buildings are also examined as possible sites for photovoltaic installations.

In Romania, OTE Group RES electricity generation is estimated at 990 MWh. In 2024, 502 base stations were equipped with photovoltaic panels.

Enabling green and digital transition

Information and Communications Technologies (ICT) play an important role in making the difference in the midst of the climate crisis. The digital transformation of businesses and the public sector is one of the top priorities of OTE Group, as we offer sustainable ICT products and services, enabling customers to improve their business's operation, competitiveness and prosperity, while reducing their environmental footprint. In this:

(a) Connectivity services contribute to the reduction of transportation needs, substitution of emissions-intensive products, processes, etc., greatly reducing hardware footprint and power consumption. Moreover, they enhance the development of e-commerce and e-governance, while providing businesses with safety and productivity.

(b) Services and solutions based on Internet of Things (IoT), Cloud and Big Data and artificial intelligence (AI) are developed:

- The utilization of fully customized resources without requiring investments in IT infrastructure.

- The incorporation of smart cities solutions by the municipalities (e.g., smart parking, smart lighting, smart waste & water management, air quality monitoring, smart public transportation etc.) improves and protects the urban environment. Such solutions contribute to the better use of resources as well as the reduction of their carbon footprint by adopting more environmentally friendly practices.

- The monitoring and management of energy consumption enables the rational use of energy.

- By optimizing the operations of a fleet of vehicles as well as monitoring driving behavior and performance, enterprises can achieve reduced fuel consumption, minimize emissions, and promote more efficient transportation practices.

- The use of advanced collaboration tools reduces the need for employees to commute daily, leading to less traffic congestion, lower emissions, and reduced strain on transportation infrastructure. Furthermore, companies can downsize their office spaces, leading to lower energy usage and reduced resource consumption (furniture, office supplies, etc.).

- The interconnection of systems and the better utilization of information.

- Reduced physical visits, less paperwork.

Revenues from ICT services, as defined in the context of the EU Taxonomy (Data driven solutions for GHG emissions reduction), amount to about 28.5 million EUR (eligible activities). More information can be found in the Sustainability Statement. It is noted that the EU Taxonomy does not yet include criteria related to the economic activity "provision and operation of a network infrastructure for telecommunications". Consequently, the essential part of the Group's business model is not yet covered by the taxonomy, so that it cannot present the majority of its core business as taxonomy-eligible/ taxonomy aligned.

2. Circular Economy

This section contains information complementary to the Sustainability Statement.

Circularity in the Supply Chain

OTE Group companies do not actually manufacture any products themselves but provide telecommunications services as well as end devices under their brand name. Circularity in the supply chain is addressed through OTE Group Supplier Code of Conduct (as well as in the OTE Group Code of Human Rights) and setting appropriate technical specifications for end devices and telecom equipment procured. Such specifications range from eco-design requirements, restrictions on the use of hazardous substances and EMF-related requirements to repairability requirements, sustainable packaging, use of FSC certified paper, etc.

Circularity for Products and Services

Eco Rating. Eco Rating is an industry driven initiative launched by a consortium of leading mobile telecom providers (Deutsche Telekom, Orange, Telefónica - operating under the O2, Vivo and Movistar brands -, Telia Company and Vodafone). The scope is to evaluate the environmental impact of new mobile phones from production, transportation to use and final disposal, following a harmonized approach. The Eco Rating scheme provides information to customers to take more sustainable decisions on selecting a device, is expected to motivate manufacturers towards more sustainable products and to increase transparency within the industry. Currently there are more than 20 mobile suppliers that support this initiative. By the end of 2024 more than 550 devices had been assessed and evaluated on the basis of durability, repairability, recyclability, resource efficiency and climate efficiency (available here). For 2024, 1% of mobile phones sold had a more sustainable profile considering Eco Rating evaluation.

Sustainable Packaging. OTE Group, as a member of DT Group, aims at reducing packaging materials and is converting own branded products packaging materials to sustainable alternatives following the DT Group packaging guideline. Since mid-2022, all own-branded newly launched CPEs (routers, Android Boxes and TV decoders) are sustainably packaged. Packaging is plastic-free, eco-friendly coating and printing is used (e.g., waterborne coating, soy ink), while paper used is 80% recycled paper and the rest 20% is FSC certified paper. Sustainable product packaging is also required for non-COSMOTE-branded devices that are sourced from third-party providers. By the end of 2024, 91% of 3rd party smartphones sold were sustainably packaged. The use of packaging materials for the refurbished end devices is also reduced (compared to those received from suppliers) as plastic is only used for the IR control and the power supply unit.

e-bill for customers in Greece. Considering that OTE Group companies are not actually manufacturing any products themselves but provide telecommunications services, paper is among the materials directly used. Paper use covers the needs of office operations but also of communications with customers (e.g., bills for the services provided). To address the latter, customers have the option to choose to receive their bills exclusively online (e-bill). In 2024 the use of the e-bill option resulted in paper savings of 619 t (Greece). For customers who still receive their bills in hard copy, all bills are printed on FSC certified paper (Greece).

Circularity in Own Operations

Internally, natural resources conservation is addressed through the efficient operation and maintenance of the telecom network (see section [Energy and Climate Change](#)) as well as initiatives like the digitization of internal processes, the refurbishment of end devices that expand the lifetime and overall utilization of the equipment provided to customers, and the development of waste management practices covering all activities nationwide.

Refuse single-use plastic. The #ZEROPLASTIC initiative, launched in 2019, continued in 2024 with the goal, that comprise the elimination of single-use plastic bottles, cups, cutlery, and food containers. Zero use has been already achieved by the end of 2021 and maintained, and plastic items have been replaced with paper or biodegradable ones. The project in 2024 is implemented in 7 buildings of OTE Group (hosting restaurants and coffee shops) and is addressed to about 6.680 employees in total. Overall, the use of more than 1.1 million single-use plastic items was avoided in 2024. The goal of the elimination of plastic bags in the retail network has already been achieved since 2019 and as a result, the distribution of more than 1.3 million pieces of plastic was avoided in 2024. For 2025, OTE Group aims to retain the zero use of single use plastic culture in major buildings.

Reduce paper use. Paper consumption at OTE Group level amounted to 102.2 t or 10.3 kg per employee. Paper consumption of the companies within the scope of the Paperless office target decreased by 36% with respect to 2020. The utilization of IT applications in the context of the broader digital transformation program of OTE Group, resulted, in 2024, in paper savings of 628 t in Greece (including the effect of e-bill). To reduce the environmental impact of printing, on top of initiatives to reduce paper consumption, refilled cartridges (63% of total consumption) are used. OTE Group aims for a 50% decrease of paper use by 2026 with respect to 2020 (OTE, CTS, COSMOTE E-Value, GERMANOS).

Packaging materials. Paper, cardboard and plastic are the main packaging materials used, with plastic accounting for about 12% of total consumption that reached 535 t, including all logistic processes. Initiatives are in place to reduce the use of packaging materials allowing at the same time for the safe transportation of products and to move towards sustainable alternatives to cover the relevant needs.

Repair end devices. OTE Group operates, since 2012, an extensive take back / refurbishment & recycling program for CPEs aiming at giving, if possible, all terminal equipment (ADSL-VDSL Routers, Optical Network Terminals, Android TV Box and STB Decoders), a second life and at ensuring the recycling of those who are beyond repair/use. In case of disconnections, technical upgrades and equipment faults, the relevant leased equipment is collected from the clients' premises or from the stores and taken to the main warehouse. The CPEs are thoroughly tested for quality and function and packed along with new or other refurbished components, to be distributed to customers as functional refurbished CPEs. Non-functional CPEs are being delivered for recycling to the national Collective System for WEEE. OTE Group operates an in-house repair center and does not subcontract the refurbishment/ repair process to a third party. In 2024, about 270,000 end devices were refurbished, while about 83,000 devices were recycled. Avoided GHG emissions are estimated at 6.3 kt CO_2 eq, while avoided plastic use is about 36.6 t.

Avoided GHG emissions and plastic use thought the refurbishment of end-devices.
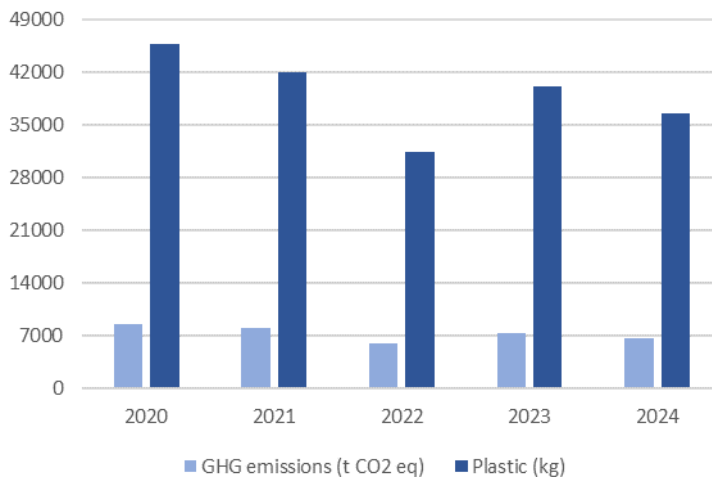
Reuse and Recycle (Waste Management). Solid waste generated by the OTE Group activities derive from the development, maintenance and operation of the telecom networks and equipment, from offices and stores operation, from the management of the corporate vehicle fleet as well as from real estate activities (construction / renovation of buildings). In addition, products sold / leased at the end of their lifetime represent another, indirect, source of solid waste (downstream).

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

A take-back scheme is implemented in the Group retail network (for phones and accessories, tablets, home batteries and ink cartridges) to facilitate the recycling of mobile devices sold / leased at the end of their useful lifetime. In 2024, about 25.7 t of devices were collected and forwarded for recycling, of which 21 t in Greece. For the period 2022 – 2024 about 470,000 devices were collected in the context of the take-back scheme in Greece.

An internal recycling program in buildings is in place (Greece). The program is based on the principle of "sorting-at-source" with centralized waste collection and management. Streams covered are paper, packaging materials, ink cartridges, phones, other small electric and electronic appliances, and batteries. In 2024, the program covers 24 office buildings nationwide, serving approximately 8,800 employees. Recycled quantities include 138 t of paper and 12,9 t of packaging materials.

3. Electromagnetic Fields

This section contains information complementary to the Sustainability Statement.

Activities in Greece. OTE supports the "Pedion24" program of continuous electromagnetic fields measurements, the results of which are readily accessible to the public at the program's website. In 2024, 251 measurement stations were in operation (two additional measurement stations were implemented in 2024), while about 110 million measurements have been conducted since the beginning of the program. In addition, OTE Group operates the OTE Environmental Electromagnetic Fields Measurement Laboratory (accredited according to EN ISO / IEC 17025). Since 2018, the scope of the laboratory accreditation expanded to cover measurements regarding 5G services.

In 2024, in addition to the measurements made in the context of the "Pedion24" program and by the OTE laboratory (7 measurements), 17 more measurements were conducted by independent institutions (Universities, Greek Atomic Energy Commission) at OTE's request. Public exposure safety limits were not found to be exceeded in points of free public access, while the measurements made by the Greek Atomic Energy Commission (to a sample of at least 20% of the base stations operating in urban areas each year) led to the same result.

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

Activities in Romania. In 2024, there were 10 EMF measurements performed by ANCOM (National Authority for Management and Regulation in Communications) on Telekom Romania Mobile sites at the request of external stakeholders. Public exposure safety limits, as set by the Order of the Minister of Public Health no. 1193/2006, were not found to be exceeded in points of free public access.

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

More about EMF Continuous monitoring in Romania can be found here.

4. Other Environmental Aspects

Water

Telecommunications operations have no specific need for water use and water consumption has not been identified as a material issue for the sustainable development of the Group. Water consumption concerns employees' hygiene, plant irrigation, HVAC needs and office / stores cleaning. Water consumed is acquired solely from public water companies which are responsible not only for water supply but also for the sustainable uptake of water from the available water resource systems. In this context, it is considered that (a) water sources are not significantly affected by OTE Group activities and (b) water withdrawal and water discharge (wastewater) are approximated by water consumption. In addition, emissions to water (in terms of effluents like phosphates, nitrates, pesticides, etc.) are not relevant.

- Water related issues are addressed in the context of the ISO 14001 Environmental Management System. Given that water stress is considered a significant issue for Greece, emphasis is given in the continuous monitoring of the issue (e.g., in terms of potential future risks, restrictions in water use, water consumption). To this end, the output of the climate scenarios with respect to the drought stress may provide useful input.

- Water consumption, in 2024, amounted to 117,848 m^3 (about 11.9 m^3 per employee).

- Measures are being implemented to improve the monitoring of water consumption and data quality, providing better insight into how much water is used and where. Currently, hydrometers have been installed in selected buildings with significant air conditioning loads to better track this specific area of consumption. Additionally, unused water supply points are being deactivated, in the context of space consolidation, to prevent unintended water use or potential leaks.

- In renovation of buildings, especially those under the LEED scheme, emphasis is given in introducing appropriate water conservation practices ranging from low-rate water supply to rainwater management, where applicable.

Wastewater generated from OTE Group operations refers to domestic wastewater, which is directed to the available wastewater networks and is then treated according to area–specific processes in the municipal wastewater facilities. In Greece, there are three cases of main buildings and warehouses where the companies operate own wastewater treatment plants that handle 8,872 m^3 of wastewater, of which about 64% is reused for irrigation purposes. No planned or unplanned water discharges to the environment as well as no significant spills occurred during 2024.

Biodiversity

OTE Group is aware of the high value of biodiversity in the countries it operates and recognizes the close relationship between biodiversity, sustainable development and human well–being. Increasing land use by human activities is one of the causes of biodiversity loss. Land use requirements for telecom companies are lower compared to other economic activities, though the provision of high-quality services everywhere and at any time necessitates the operation of a geographically extensive network of telecommunication installations (base stations and wireless communication stations) including, inevitably, in NATURA 2000 sites, RAMSAR and other protected areas. In addition, activities across the supply chain may have an impact on biodiversity.

After a comprehensive review of the Group's business activities and locations biodiversity has been assessed as non-material. Biodiversity related issues are addressed in the context of the ISO 14001 Environmental Management System. OTE Group addresses biodiversity preservation across its value chain, to the extent possible as OTE is not a product manufacturer, through:

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

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

- The climate change strategy in place, as climate change has a high impact on ecosystems and biodiversity.

- The policy on circular economy, in the context of which the lifetime of end devices is extended, the use of natural resources is reduced, and valuable materials are returning back to the market through recycling.

- The development of ICT solutions that can have a positive impact on biodiversity preservation, such as those implemented in the context of the LIFE Safe-Crossing project.

- Partnerships with social enterprises to address specific problems (e.g., working with ENALEIA for the removal of plastic pollution from the marine environment of Greece – COSMOTE BLUE initiative).

In Greece, in 2024 there were 966 OTE base stations installed in 198 Natura sites, covering areas of 45,7 hectares, respectively. In Romania there were 34 base stations in Natura sites, covering an area of 0.97 hectares (2023). More information on the protected areas (e.g. location, maps, area, protected species, etc.) is available on the relevant website of the European Commission (NATURA 2000 sites) and the RAMSAR convention.

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

With respect to installations in or adjacent to protected areas it should be noted that:

- Potential impacts are mainly related to the operation of installations in isolated areas necessary for the reliable provision of telecommunication services (energy consumption, EMF emissions) and infrastructure works for upgrading / maintaining telecommunication network (waste generation).

- All potential impacts are addressed in the Environmental Impact Assessment studies carried out and submitted for approval to the designated authorities as foreseen by national legislation in force. In these studies, special reference is made to protected areas (NATURA, SPA, RAMSAR, CORINE, IBA) and areas of high biodiversity value that are near to the activities of OTE Group companies. The contents of these studies and the approval process, that includes a public consultation phase, are specified in the relevant legislative acts. These studies, on the basis of current scientific knowledge, conclude that impacts on biodiversity are not material, and therefore there are no protected and / or restored habitat areas that are affected by the operation of OTE Group.

- In the case of smaller base stations installed in protected areas, an Environmental Impact Assessment is not required. In these cases, a Statement of Standard Environmental Commitments is submitted to the Hellenic Telecommunications & Post Commission accompanied by a Special Environmental Assessment.

- The majority of the installations are small, without permanent personnel and with limited transportation activities at the operational stage.

Noise

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

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

- In order to reduce noise levels from ventilation and/or cooling systems to the levels foreseen by legislation, soundproofing constructions are placed, or old units are replaced with new, more advanced ones that operate at lower noise levels.

Visual Impact

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

- The size of new Base Stations being built now has been decreased.

- Efforts are made to collocate Base Stations in common installations with the other telephony companies so as to reduce all potential impacts, including overall visual impact of mobile Base Stations.

- For the installation of new telecommunication infrastructure necessary for the provision of communication services, all efforts are made, to the extent that is technically feasible, to minimize the visual intrusion produced, especially in urban areas by appropriate arrangements and constructions that blend well with the surrounding environment.

- Appropriate modifications are also applied to existing telecommunication infrastructure.

Direct non-GHG emissions

Emissions of typical air pollutants (NOx, SO2, PM10 and VOCs) are mainly related to road transportation and the use of electricity generators to support the operation of the telecom network. Emissions of Persistent Organic Pollutants (POP) are of minor importance as transformers and capacitors which could have been a significant source of PCB (Polychlorinated biphenyls) emissions due to leakage, have been decommissioned, disposed of and replaced by new ones that do not contain PCB, in line with the provisions of legislation in force.

Non-GHG direct emissions.
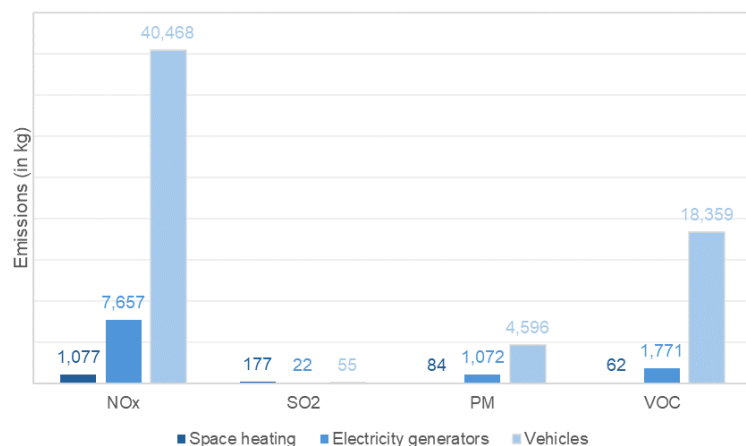
Society

1. Labour and Decent Work

This section contains information complementary to the [Sustainability Statement](#).

The majority of OTE Group employees are employed with a full time, indefinite duration contract. There are no temporary contracts and very limited number of definite duration mainly refereeing to probation periods that in case of successful completion are converted to indefinite. In case of temporary needs the company assigns services to third companies with service contracts and the third companies utilize their own workforce.

Individual self-employed persons are very limited and they are mainly involved in network technology projects. They account for less than 5% of the costs of the entire workforce. Freelancers do not have an employment relationship with the company and are not subject to the same working conditions that benefit the majority of the workforce.

Non-discriminatory Compensation

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

Employees' salary is determined by the level of the position they hold, their level of education or role and the years of employment. The minimum (basic) salary is adjusted according to the salary category the employee belongs to.

Indicatively, the minimum (basic) salary for OTE employees is set by the applicable collective labour agreements, from 01/04/2023 until 31/12/2025, at €850 up to €1,100, depending on the business role/position they hold and irrespective of gender. This is higher than the national minimum wage in Greece, which was set at €780 at the time of the agreement and increased to €830 in April 2024.

OTE Group ensures that performance-based remuneration is provided to a broader segment of the workforce. Specifically, both management and non-management employees are eligible for variable performance-based pay components, such as annual bonuses. Eligibility is determined based on role, contribution to business objectives, and alignment with performance metrics at both individual and team levels.

Employee Benefits

OTE Group considers its employees the most important asset and a key factor for the company's prosperity, sustainability, and growth. Therefore, creating and providing a modern and sustainable working environment of high standards for its people, is a top priority for OTE Group. In this context, the company provides them with a wide range of benefits, aiming to significantly upgrade their quality of life, while contributing to balancing their personal and professional needs and strengthening their family planning. At the same time, an appealing benefits scheme serves as a safe and efficient way to promote employees' job satisfaction and increase their loyalty to the company.

The existing benefits schemes vary per company within OTE Group, to better fit the different employees' profiles and needs. They consist of the core benefits, available to all employees, such as medical and life insurance, mobile and fixed phone services, and optional or status benefits, based on the family profile and the business role of each employee.

In the Collective Labour Agreement of OTE in force from 01/04/2023 until 31/12/2025, as well as in the Collective Labour Agreements of CTS and GERMANOS signed on December of 2023, it is stated that in case of serious diseases, the employees are entitled to 100 working days of paid sick leave, instead of 30 days set by the Greek law.

The Group provides parental leave for childcare, which is above the minimum leave set by law. More specifically, OTE, COSMOTE PAYMENTS and OTE Estate offer an additional 26 weeks of paid leave, while CTS and GERMANOS offer an additional 13 weeks of paid leave. Parental leave is provided to working mothers or fathers, immediately after the end of maternity leave. Parental leave retention rate in OTE Group is more than 90%.

OTE, CTS and GERMANOS employees who have children with a disability of 67% or higher, receive additional days from those provided by the law (a total of 12 days vs 4), for the monitoring of the performance of children. The days are granted to both mothers and fathers.

Following government guidelines, OTE Group provides to parents of young children the choice to work from home for some days of the week, if they ask for it and their role allows it.

Moreover, the Group provides additional benefits, such as the following:

- Allowance for childcare and nursery costs.
- Wedding income support (e.g., wedding gift).
- Financial support of employees.
- Financial rewards for employees who excel in institutions of higher education or foreign language degree.
- Financial rewards for employees' children, who excel in secondary and higher education.
- Special support for large families.
- Christmas gifts to employees' children.
- Preferential prices for employees and their Family members for fertility services and for egg-freezing.

Performance Management

Performance management is a fundamental tool, not only for identifying the work output and contribution of employees and executives, but also for initiating and supporting the creation of solid individual development plans. In 2024, OTE Group launched WEGROW, the new performance and development philosophy with the motto "Shape your future, elevate your performance". Its aim is to enhance employees' responsibility for their personal growth and create conditions for high-performing teams.

WEGROW is based on regular dialogues and feedback between managers and employees, fostering a culture of open dialogue and honest exchange of ideas. Key elements of the process include goal setting, dialogue, feedback, and regular meetings to monitor goals and development, all supported by a dedicated digital platform.

Employees moving into positions of managerial responsibility for the first time, undergo dedicated training on how to evaluate their teams and create individual development plans for their people. 22 newly appointed managers in 2024, attended the relevant Performance Management training. Moreover, all leaders of the company participated in the "Coach for Growth" leadership program, where they were trained to perform structured development talks with their people.

100% of employees at OTE Group companies received Performance Evaluation in 2024.

The performance cycle includes an annual appraisal, with an additional mid-year review for employees rated in the lowest performance rating, aimed at improving performance during the year.

Talent Acquisition

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

External recruitment process: The new recruitment process for non-executive positions involves interviews and corresponding assessment activities. External candidates can apply to job postings on the company's corporate page on LinkedIn and via its career site. OTE Group also participates in several career events.

Internships: In a comprehensive and modern working environment, opportunities are offered to students, such as interns, in order to apply the knowledge that they have gained from their academic course in a working environment. Cooperation with educational institutions, strengthens the Group's relationship with young people, facilitating their transition to the requirements of the labour market. In 2024, 461 university and technical school students completed an internship at OTE Group companies in Greece.

Employment Security / Responsible Workforce Restructuring

OTE Group in Greece complies with the provisions of Presidential Decree 178/2002, which stipulates that in every case of merger or transfer of a business, the transferor is obliged to inform the representatives of its employees about the timing, the reason, the consequences, and the measures related to the transfer, in a timely manner, before the transfer takes place.

In 2024, voluntary exit programs (VES) with financial incentives were adopted in a number of OTE Group companies in Greece, aiming at the enhanced rationalization of human resources and respective labour costs. In total, 277 of OTE Group employees, applied for the scheme and accepted the incentives offered, which were designed in a socially responsible manner. VES incentives include financial packages that exceed legal indemnity and other offerings such as

outplacement services and medical coverage. In cases of major restructurings VES packages are available as an option to all impacted employees.

Employee Training and Skills Development

A core part of OTE Group's strategy is to empower its employees and support them to develop the necessary skills to succeed within the Group, grow personally and professionally. In this context, it offers a plethora of online and in-class upskilling and reskilling training courses, available for all employees.

OTE Group considers learning as a culture and constantly encourages its people to take advantage of every development opportunity that is offered to them.

All the upskilling and reskilling programs were designed and implemented periodically, throughout the year, in accordance with the needs of the Group. The ultimate goal of the trainings was to build strong capabilities across the organization.

In 2024, OTE Group provided its employees the opportunity to participate in a range of training programs, such as:

- Dynamic Training Academies supporting significant functions (Front-line and Network Technology) or operational changes in the company (Agile working).
- A wide range of individual programs in numerous specialties, for personal development.
- Advanced experience in digital personal learning and development, using modern methods and engagement tools.
- Culture Change and Team Bonding programs empowering teams, where the company brings the employees together to celebrate their achievements.

The Coach for Growth Leadership Training Program is an innovative educational program designed to enhance leaders' ability to develop and empower their teams. It was implemented for OTE, CTS, COSMOTE PAYMENTS, COSMOTE E-VALUE, GERMANOS and OTE ESTATE. Based on the updated Leadership Anchors of OTE Group, this program aims to foster a growth mindset and personal development. Through interactive methods and cutting-edge tools, participants discover how to develop their leadership skills while simultaneously improving their team's performance.

Employee Engagement

Twice a year, in May and November, OTE Group invites its employees to share feedback on their work experience, aiming to identify areas for improvement and enhance daily working life. Responses to key topics - such as Mood, Employer Attractiveness, Career Development, and Customer Centricity - are used to calculate the Employee Experience Score, a core indicator of overall employee satisfaction.

The target set by DT for the 2024 Employee Experience Score, based on the average results of the May and November employee surveys, was 78%. The final score exceeded expectations, reaching 80%. In the November 2024 survey specifically, OTE Group achieved an Engagement Score of 82%, confirming a positive trend in employee satisfaction. Participation reached 92%, with more than 8,250 employees taking part. These strong results demonstrate a high level of engagement and a shared commitment among employees to actively contribute to the Group's ongoing improvement and success.

Inspiration, purpose, learning, trust culture, work - life balance, customer centricity and personal growth are some of the key survey topics. Moreover, the employee surveys include sustainability related topics, with gratifying results. More specifically, 93% of the participants stated that they agree with OTE Group's environmental and social commitment, while a total of 93% believe that OTE Group acts responsibly towards the environment and society. 88% of the participants believes that all employees are offered the same opportunities for hiring and career development within the Group, and 91% believe that OTE Group provides a safe and supportive work environment for all.

The Employee Survey is a dynamic and reliable diagnostic tool, and it evolves to reflect elements of the strategy and the objectives of OTE Group, as well as trends that dominate the external environment. The key survey topics mentioned above, not only mirror the Group's overarching vision but also provide valuable insights, guiding in this way, future changes in the Group's working environment.

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

Supplementary HR Data

Unless otherwise stated, all metrics are consolidated at OTE Group level, based on the internal active workforce and include companies with a minimum of one full-time equivalent (FTE).

Telekom Romania Mobile is excluded from all metrics, with the exception of Health and Safety data.

Employee Training metrics exclude COSMOTE TV, COSMOTE Global Solutions, OTE Insurance, and OTE PLC.

The rate of employee turnover is calculated by dividing the number of departures during the year by the headcount yearly average.

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

Injury rate: (Total number of injuries / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees. The data do not include minor (first-aid level) injuries.

Recordable work-related injuries (including fatalities) rate: (Total number of recordable work-related injuries (including fatalities) / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees. The data do not include minor (first-aid level) injuries.

Lost day rate: (Total number of lost calendar days / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees. Lost day count begins on the day of the injury or the next day, depending on the time of the day.

PERFORMANCE INDICATORS ON HUMAN RESOURCES	UNIT	2024
Management Level (HC Average)		
Non-managerial positions	Number (%)	8,499 (90.7%)
Male	Number (%)	5,166 (60.8%)
Female	Number (%)	3,332 (39.2%)
Supervisors, Team Leaders	Number (%)	169 (1.8%)
Male	Number (%)	83 (49.1%)
Female	Number (%)	86 (50.9%)
Middle management	Number (%)	616 (6.6%)
Male	Number (%)	446 (72.5%)
Female	Number (%)	170 (27.5%)
Top management	Number (%)	85 (0.9%)
Male	Number (%)	64 (75.4%)
Female	Number (%)	21 (24.6%)
Employees covered by enterprise collective labor agreements (HC)	**Number (%)**	**8,709 (88.2%)**
Management positions in revenue-generating functions	**Number**	**717**
Male	Number (%)	503 (70.2%)
Female	Number (%)	214 (29.8%)
STEM-related positions	**Number**	**4,575**
Male	Number (%)	3,871 (84.6%)
Female	Number (%)	704 (15.4%)
Recruitment	**Number**	**280**
External recruitment	**Number (%)**	**193 (68.9%)**
Gender		
Male	Number (%)	112 (58.0%)
Female	Number (%)	81 (42.0%)

PERFORMANCE INDICATORS ON HUMAN RESOURCES	UNIT	2024
Age		
Under 30 years	Number (%)	54 (28.0%)
Between 30 and 50 years	Number (%)	138 (71.5%)
Over 50 years	Number (%)	1 (0.5%)
Management Level		
Non-managerial positions	Number (%)	190 (98.4%)
Supervisors, Team Leaders	Number (%)	1 (0.5%)
Middle management	Number (%)	1 (0.5%)
Top management	Number (%)	1 (0.5%)
Internal recruitment	**Number (%)**	**87 (31.1%)**
Gender		
Male	Number (%)	50 (57.5%)
Female	Number (%)	37 (42.5%)
Age		
Under 30 years	Number (%)	1 (1.1%)
Between 30 and 50 years	Number (%)	78 (89.7%)
Over 50 years	Number (%)	8 (9.2%)
Management Level		
Non-managerial positions	Number (%)	86 (98.9%)
Supervisors, Team Leaders	Number (%)	1 (1.1%)
Middle management	Number (%)	0 (0.0%)
Top management	Number (%)	0 (0.0%)
Promotions	**Number**	**48**
Male	Number (%)	34 (70.8%)
Female	Number (%)	14 (29.2%)
Departures	**Number**	**582 (6.2%)**
Voluntary departures (incl. voluntary exit programs)	**Number (%)**	**524 (5.6%)**
Gender		
Male	Number (%)	361 (62.0%)
Female	Number (%)	163 (28.0%)
Age		
Under 30 years	Number (%)	21 (3.6%)
Between 30 and 50 years	Number (%)	285 (49.0%)
Over 50 years	Number (%)	218 (37.5%)
Involuntary departures (incl. fixed-term contracts ended, dismissals, retirements, deaths)	**Number (%)**	**58 (0.6%)**
Health and Safety		
Fatalities (number of employees)	Number	0
Employees injured	Number	41
Recordable work-related injuries (incl. fatalities)	Number	41
Total working days lost due to accidents	Number	588
Injury rate	Number	0
Recordable work-related injuries (incl. fatalities) rate	Number	0
Lost day rate	Number	6

PERFORMANCE INDICATORS ON HUMAN RESOURCES	UNIT	2024
Employee training		
Total participations	**Number**	**17,371**
Male	Number (%)	9,106 (52.4%)
Female	Number (%)	8,265 (47.6%)
Total employees who participated in training	**Number (%)**	**6,021 (64.7%)**
Gender		
Male	Number (%)	3,739.0 (62.1%)
Female	Number (%)	2,282.0 (37.9%)
Total training hours	**Number**	**328,058**
Gender		
Male	Number (%)	151,273 (46.1%)
Female	Number (%)	176,785 (53.9%)
Age		
Under 30 years	Number (%)	94,553 (28.8%)
Between 30 and 50 years	Number (%)	190,363 (58.0%)
Over 50 years	Number (%)	43,142 (13.2%)
Management Level		
Non-managerial positions	Number (%)	287,663 (87.7 %)
Supervisors, Team Leaders	Number (%)	8,276 (2.5 %)
Middle management	Number (%)	29,759 (9.1 %)
Top management	Number (%)	2,361 (0.7 %)
Training days per employee (HC average)	**Number**	**4.4**
Training hours per employee (HC average)	**Number**	**35.2**
Gender		
Male	Number	26.5
Female	Number	49.6
Age		
Under 30 years	Number	784.7
Between 30 and 50 years	Number	27.9
Over 50 years	Number	17.9
Management Level		
Non-managerial positions	Number	33.9
Supervisors, Team Leaders	Number	49.1
Middle management	Number	48.4
Top management	Number	27.7
Total employee training expenditure (€)	**Number**	**4,133,834**
Average amount spent per FTE on training and development (€)	**Number**	**1,140.8**
Strikes		
Number of strikes	Number	4
Duration of the strikes (in days)	Number	4

2. Consumers and End-Users

Responsible Marketing

OTE Group conforms to the applicable laws and regulations regarding communication and advertising. All promotional materials are reviewed prior to their release to ensure that they abide by applicable laws and are suitable, impartial, genuine and that they respect diversity.

In Greece, the Group's companies adhere to the Hellenic Code of Advertising and Communication Practice, as established by the Advertising Self-Regulation Council (SEE). In 2024, the SEE did not issue any decisions, at either the initial or appellate level, regarding non-compliance with the Code by the OTE Group in Greece.

Respectively, Telekom Romania Mobile Communications follows Code of Advertising Practice of the Romanian Advertising Council (RAC).

Transparency and provision of information to customers and end users

In line with the current regulatory framework, OTE Group is committed to handling pricing matters in a clear, simple, and transparent manner. This includes disclosing billing information within the legally defined timeframes. Pricing details are readily available through company applications, websites, customer service centers, and informational brochures.

Customers are informed of billing details and any unexpected changes directly through their accounts' bills. To address spending control, OTE Group has developed mobile apps for bills and account management and introduced cost control services. Additional tools, such as the Multimedia Information Service (MIS) Billing Update and COSMOTE Mobile Split Bill, help prevent overcharging. In addition, the Group offers a user-friendly and technologically advanced e-bill service, giving customers a more comprehensive and accessible view of their charges.

All service contracts and general terms are provided in printed form or sent via e-mail. Both existing and prospective customers can access the Terms of Use and information about their rights through the Group's official websites.

Safety information and installation instructions regarding own branded products are available on the Group's Greek websites. In 2024, no penalties or warnings were issued to OTE regarding product safety or regulatory compliance.

Handling of Complaints and Requests

Driven by its commitment to offering a superior customer experience, OTE Group has streamlined its complaint management structure by removing multiple levels of request handling and minimizing resolution time. In 2024, 67% of complains were resolved on the same day. Customer complaints are handled end-to-end solely by the Customer Care Frontline.

The Group prioritizes delivering an effortless experience across both physical and digital channels, ensuring an Omni-Channel Customer Experience. By understanding diverse customer needs, the Group responds with flexibility and insight, providing high-quality service aimed at improving everyday life. This is achieved through First Contact Resolution (FCR) and, when further action is required, by closely monitoring requests and confirming their resolution with responsibility and consistency, resulting in fewer complaints and more satisfied customers.

The Group continuously enhances its digital self-care capabilities, attracting more customers to regularly use the apps to fulfill their requests, while maintaining high satisfaction ratings in app stores and reducing the need to call for support. Customers use the apps to view and pay their bills; top up their prepaid or other balances; activate packages, offers and new mobile lines; manage their home connectivity (router and fault management); renew or change their plans; receive chat support; activate services such as extending the expiry date of their bill or setting up a settlement; and reconnect instantly.

Additionally, the unique ticketing system ONE Ticket that is integrated with all touch points (call centers, COSMOTE App & web and physical shops) enables customers to submit and handle all requests, technical support and commercial, ensuring relevance of information, personalization, and transparency. As a result, ONE Ticket contributes to the improvement of customer experience by enabling a unified and omni-channel customer service.

Further actions/initiatives include:

- *Live Chat & AI Chatbot Integration:* Customers can engage in instant, interactive communication through live chat available on the portal and mobile apps. An AI-powered chatbot acts as a digital assistant, guiding users through the features of the COSMOTE App, website, and What's Up App.

- *Conversational Sales Assistant:* A real-time digital assistant that tracks users on key sales pages and engages them via chat.

- *Automated Speech Recognition (ASR):* The Group has unified its Interactive Voice Response (IVR) systems into a single voice application. Powered by conversational AI, it enables efficient self-service options, aligning with the Group's commitment to a seamless, omni-channel customer journey.

- *Sign Language Video Call Support:* Enhancing accessibility, the customer service team offers personalized support through video calls in sign language via the portal, empowering customers with hearing disabilities and promoting digital inclusion.

- *Dedicated social media Team:* A specialized team manages all customer interactions across social media platforms, ensuring timely and consistent responses to customer inquiries and feedback.

- *COSMOTE UFixIt:* A remote support service enabling customer care agents to view issues in real time via secure video streaming from the customer's smartphone or tablet, providing step-by-step guidance for resolving technical problems.

- *Just Digital:* To facilitate easy self-care, Customer Care Agents send SMS messages containing deep links and concise instructions. Customers can click the link to be directed straight to the relevant app or webpage to complete their request seamlessly.

- *Novus Team:* A team of Technical Solution Experts equipped with advanced diagnostic tools to resolve issues quickly and effectively. Their focus is on achieving first-contact resolution and minimizing fault escalations, thereby enhancing customer satisfaction.

Customer Surveys

Customer satisfaction is measured using the globally recognized TRI*M method. In 2024, high scores were achieved on the TRI*M Index, reflecting strong customer loyalty. According to the 2024 TRI*M Customer Survey, 88% of customers in Greece rated the company's overall performance as Excellent, Very Good or Good. Additionally, high scores were achieved on the question "How would you evaluate the company as to: whether the company makes me feel like I am in good hands?", as 85% of customers in Greece responded "Excellent, Very Good or Good".

OTE Group systematically collects customer feedback on a daily basis through its Voice of the Customer Program. Using a unified survey platform, the Group measures key performance indicators such as Net Promoter Score (NPS), Satisfaction, Request Resolution, and Customer Effort. Customers are invited to provide feedback following interactions, upon completing specific journeys, or while using products and services. Thousands of customers responses have been collected and analyzed to better understand the drivers of satisfaction and dissatisfaction. Based on these insights, targeted initiatives have been implemented to improve customer experience across products, services and touchpoints. As a result of these ongoing efforts, the NPS improved in 2024 compared to 2023, demonstrating continued progress in enhancing customer loyalty and experience.

Protection of Minors

As stated in its Code of Human Rights, OTE Group stives to protect children and young people when they are using digital media and take the relevant criteria for the protection of children and young people into account when developing its products and services.

OTE Group offers products and services for the safe use of internet, e.g., parental control services through COSMOTE Total Security. Beyond product development, the Group also works to raise awareness among children, young people, and their parents, through specific educational programs with representatives and specialists from the Cyber Crime Unit of the Hellenic Police.

OTE Group, as a member of Deutsche Telekom, participates in the "ICT Coalition for Children Online," adopting high voluntary standards that are hugely important to the online security of children. Additionally, in collaboration with other mobile telephony providers in Greece the Group has contributed to the development of the "National Code of Conduct for mobile phones and protection of users".

OTE Group supports critical infrastructure and provides financial support to hotlines serving vulnerable groups, particularly children in need. The Group actively supports the operation of the following helplines:

- SOS 1056, "The Smile of the Child".
- European Hotline 116000 for missing children, "The Smile of the Child".
- European Helpline for Children 116111, "The Smile of the Child".
- 11525 Advice Helpline "Together for Children".
- 10454 "ELIZA" Helpline, for guidance on suspected child neglect or abuse.
- National Hotline for Missing Adults 1017.

OTE Group is also dedicated to digital inclusion and education, offering programs such as Educational Robotics and STEM for children. In 2024, the Group donated approximately €500,000 to nonprofit organizations supporting child welfare.

Furthermore, in partnership with the non-profit organization "Pediatric Trauma Care", the Group contributed over €650,000 to equip three children's hospital units in Greece with vital medical equipment. Over the past 13 years, OTE Group has supported 23 pediatric hospital units across the country, helping improve care for around 100,000 children annually.

3. Social Contribution

This section contains information complementary to the *Sustainability Statement*.

The Group aims to address both fundamental and emerging social needs through a range of long-term programs and innovative initiatives. Technology lies at the heart of its social contribution strategy, providing essential tools to support an inclusive and equitable digital society, while also promoting social welfare, environmental protection, and overall quality of life.

OTE Group's social contribution focuses on three key areas:

- **Digital Society:** Actions that provide digital skills and tools to eliminate inequalities and barriers, ensuring everyone can benefit from today's technological opportunities.

- **Social Commitment and Volunteering:** Initiatives that support vulnerable groups and reduce social inequalities, while also fostering a spirit of solidarity and active engagement among OTE Group employees toward various social causes, especially in crisis situations.

- **Environmental Commitment:** Adoption of sustainable practices, contributing to natural resource protection, and raising community awareness.

Management and oversight of social contribution initiatives

To ensure optimal management of its initiatives, OTE Group systematically develops internal mechanisms and processes.

OTE Group's Donation Policy defines the specific transparent and mandatory procedures to be followed by the OTE Group companies when assessing and implementing Donations, based on the action areas defined by its strategy.

OTE Group's Sponsoring Policy describes how to deal with Sponsorship issues by setting out clear criteria for implementing the procedure which needs to be followed by the OTE Group companies in order to carry out Sponsorships, ensuring transparency regarding the efficient use of resources allocated for Sponsorships.

The Chairman and CEO, along with Senior Management, oversee the goals and strategy of key social initiatives and are regularly informed about the implementation. Ongoing stakeholder dialogue informs the development of new initiatives, while data is collected to measure and monitor their impact.

In 2024:

- **€2.5 million** in total social contribution (including both in-kind and financial support).

- **€2.6 million** in total social investment (including implementation costs and employee volunteering efforts).

- **1.1 million** beneficiaries.

Educational Robotics: OTE Group is one of the first companies in Greece to systematically invest in the dissemination of educational robotics and STEM (Science, Technology, Engineering, Mathematics) educational methodology in Greek schools, over the past 10 years. The company has implemented a series of actions, in partnership with the NGO "WRO Hellas" for educational robotics and science, contributing to the development of digital skills of over 330,000 children and teachers. In 2024, 1,381 teams of students participated in the 2024 National Educational Robotics Competition for kindergarten, primary, junior high and high school students. In alignment with the theme "Mediterranean Sea: as a source of life and culture", they presented innovative ideas and various robotic solutions in different categories of the local and final events. In the last 10 years, there have been more than 53,000 student participations in the competitions.

Scholarships: In 2024, over €500,000 was awarded to 30 first-year university students who were facing social and financial barriers. Additionally, with a view to fully cover the needs of young people, COSMOTE offered to its Scholars a laptop along with a full package of fixed and mobile telecommunication services, Internet, for all years of their studies as well as COSMOTE TV for 1 year. Since the launch of the program in 2002 to date, 844 scholarships have been awarded to students, the value of which exceeds 8.5 million euro.

Educational Programs and Digital Experience in the OTE Group Telecommunications Museum: The Museum in 2024 offered in-house and online educational programs for school groups and families. The programs for school groups included guided tours, STEM programs, art workshops and information events about safe internet browsing. For the fourth year, the Museum held online art workshops addressed to the remote primary schools of Greece focused on the important topics of recycling and environmental protection. For families, the Museum offered art workshops, educational activities, STEM programs and guided tours at the Museum's permanent exhibition hall using new digital applications (audiovisual material, Augmented and Virtual Reality). In addition, respective educational videos on-demand were available on the Museum's website for visitors to download and watch at their convenience. In 2024, 9.029 people participated in the Museum's educational programs and guided tours digitally and in-house at the Museum premises, and 254 educational programs were carried out in total for schools, families and other groups.

COSMOTE BLUE: Through the COSMOTE BLUE initiative, COSMOTE TELEKOM is committed to take action for the protection of the environment and in particular of the Greek seas and the reduction of the risk of biodiversity loss in marine ecosystem. COSMOTE TELEKOM joins forces with the social enterprise ENALEA, aiming at the removal of plastic pollution from the marine environment of Greece. By 2025, the initiative aims to collect >90 t of plastic from the marine areas of the Thermaikos, Halkidiki, and Argosaronikos Gulf, and Crete by engaging professional fishermen and more than 45 dishing vessels of the ENALEA network; train >200 fishermen in sustainable fishing methods, good practices for cleaning seas, and responsible management of fishing equipment; and recycle >52 t of the collected plastic for conversion into new products such as jackets, shoes or even furniture. Until 2024, 74 t. of plastic was collected and >42 t. was recycled. The results of this collaboration are externally assured by an independent third party, ensuring transparency and credibility.

Employee Volunteering and Donations: OTE Group supports charitable and environmental causes through donations to non-governmental organizations (NGOs) and by encouraging the voluntary engagement of its employees, especially in view of crisis response. In 2024, there were over 4,000 employee participations in social contribution initiatives, such as blood and bone marrow donations.

More information on OTE Group's social and environmental initiatives can be found at its website.

Governance

1. Compliance

This section contains information complementary to the [Sustainability Statement](#).

All OTE Group employees, upon hiring and on an annual basis, are required to digitally or manually sign that they are aware of and comply with the Group's Code of Conduct, as well as with all other Compliance policies, which are available in local languages (i.e., in Greek, Romanian and English).

79% of employees received training through the 'Basic Knowledge Compliance' e-learning program, which serves as the core online course for all OTE Group staff. The training covers the Code of Conduct, conflicts of interest, anti-corruption principles, and includes a self-assessment to guide ethical decision-making in complex situations.

In 2024:

- 29 tip-offs were received concerning potential incidents of embezzlement, theft, or fraud. Of these, 18 cases were confirmed following investigation.

- Incidents involving employee misconduct related to fraud or violations of the OTE Group Code of Human Rights and OTE Group Code of Conduct:

    - 12 cases led to the termination of employee contracts.

    - 5 cases resulted in disciplinary sanctions imposed by the competent internal disciplinary bodies.

    - 2 confirmed fraud cases met the materiality criteria and were accordingly reported to the OTE Group GRC Committee, the OTE Audit Committee, the OTE Board of Directors, and Deutsche Telekom Group Compliance Management.

- No court convictions for corruption issues against OTE Group or its employees in relation to their professional activities occurred.

- No fine or non-pecuniary penalty (e.g., suspension of operating license or prohibition of business activity) for corruption or fraud violations (including tax fraud and manipulation of financial reporting) was imposed on OTE Group companies.

- No plausible cases of conflicts of interest.

- No cases of money laundering / insider trading.

- No fines for anticompetitive behavior.

- No incidents of corruption or anti-competitive behavior were identified regarding contracts with business partners that led to contract termination or non-renewal.

- No case or incident were recorded that resulted in the exclusion of suppliers from the tender procedures.

OTE Group's compliance policies, available on the corporate website, reflect the company's strong commitment to ethical conduct and integrity. Key principles include:

- Prohibition of Facilitation Payments: As stated in the OTE Group Code of Conduct, facilitation payments are strictly prohibited.

- Guidelines on Gifts, Favors, and Entertainment: The OTE Group Benefits Policy outlines rules for accepting and granting benefits between OTE Group employees and external parties. It also regulates the provision of benefits by the company to its employees, ensuring transparency and fairness.

- Anti-Corruption and Conflict of Interest Measures: The Policy on Avoiding Corruption and Other Conflicts of Interest sets out clear procedures to prevent bribery and corruption, manage real or potential conflicts of interest, and address any incidents that may compromise the interests of the company, its customers, or its business partners.

- Political Neutrality and Ethical Sponsorships/Donations: In line with the Code of Conduct, Donation Policy, and Sponsoring Policy, OTE Group does not provide donations or benefits to political parties, elected officials, or politically motivated initiatives. The use of company resources for political purposes is not permitted. These policies also clearly define the types of donations and sponsorships allowed, including supported sectors, selection criteria, and prohibited activities.

2. Human Rights

The Group has adopted the "Code of Human Rights". The principles and expectations described in the Code are aimed equally at the Group's employees, as well as to its suppliers and business partners.

The Human Rights Risk and Impact Analysis of the Group's operations is carried out in accordance with the Enterprise Risk Management (ERM) methodology and includes risk mapping, potential risk scenarios, likelihood of occurrence, key impacted business areas, as well as implemented and proposed mitigation measures. This analysis was conducted across all OTE Group companies during the periods 2018–2019 and 2021–2022. A new assessment cycle has been scheduled to take place in 2025, according to the provisions of the updated Code of Human Rights.

In 2024:

- No convictions were issued against OTE Group by the judiciary authorities concerning any discrimination in the workplace.

- 34 tip offs related to potential human rights breaches were submitted. Of these, 9 cases were confirmed, 15 were assessed as not plausible, and 10 remain under investigation. Among the confirmed cases, 8 involved incidents of harassment or discrimination. Following thorough investigations by Compliance, appropriate disciplinary actions were taken: one case resulted in termination of employment, two in formal warning letters, and one in a warning letter. None of the confirmed cases met the materiality criteria for escalation to the Board of Directors or other relevant Committees.

Training on Human Rights

As part of the Compliance Training Program, all classroom training courses, from introductory to advanced levels, include information and guidance on the OTE Group Code of Human Rights. These trainings are tailored to different audiences, including employees without managerial responsibilities, governance body members, and managers or expert-level employees. Sessions are delivered either in person or digitally. In 2024, a total of 3,017 employees were invited to participate, and the overall participation rate among them reached 89%. Additionally, employees from the Group Procurement unit participated in a custom-designed training session.

OTE Group offers online training programs on Human Rights and Diversity Equity, and Inclusion (DEI), providing its employees with foundational knowledge to foster a shared understanding and inclusive workplace culture.

Since Q4 2024, OTE Group Managers have been participating in custom-designed live webinars titled "Prevention and Handling of Violence and Harassment Issues in the Workplace". These sessions provide practical guidance on identifying and addressing instances of bullying or harassment, as well as on appropriately responding to reports of misconduct.

Training participation is actively monitored to ensure alignment and awareness across all employees. Specifically, for online trainings available on the PERCIPIO or HR-SUITE training platforms, automated reminder emails are sent to employees with pending training obligations, at least once per month, to encourage timely completion.

3. Responsible Purchasing and Supply Chain

This section contains information complementary to the Sustainability Statement.

OTE Group believes that the diffusion of key values and standards in the supply chain is an important feature of responsible business conduct.

To achieve this OTE Group is committed to its Strategic Pillars of:

- Setting standards and requirements,

- Monitoring and assessing impacts and risks in the supply chain and partners,

- Preventing and remediating risks,

- Communicating process and results.

Responsible Procurement

All procurement practices are carried out according to the OTE Group Procurement Policy, which sets out all the terms and regulations under which purchases of products, materials/equipment, services or works by vendors (suppliers) are made. The Policy aims to:

- Optimize value in terms of cost, quality and time.

- Ensure transparency through the procurement process.

- Align with Deutsche Telekom's Global Procurement Policy.

While the Procurement Policy does not distinguish between local and non-local suppliers, it is common practice for the Group Companies to support domestic suppliers. In practice, this is reflected in the percentage of procurement sourced locally in 2024: 79.6% in Greece and 81.1% in Romania.

OTE Group companies aim to ensure the timely payment of their suppliers, as defined in their procurement contracts. In 2024, payments made to suppliers ranged from 0 (immediate) to 120 days, based on the type and value of the procurement.

Employees in the purchasing departments receive training provided by OTE Group, covering topics such as the Group's Procurement Policy and the Supplier Code of Conduct. For example, in 2024, staff from the Group Procurement unit participated in a customized compliance training session, which included references to the OTE Group Code of Human Rights.

Integrity Checks

Legal documents of prospective suppliers are reviewed regularly by the OTE Group Compliance department, during the procurement process and prior to contract signing, in order to determine prospective suppliers' good legal standing and solvency. In 2024, 1,389 Integrity checks / Compliance Third party Assessments of suppliers, consultants and partners were completed. Furthermore, 100% of the prospective suppliers for Central Procurement purchases equal or exceeding €200,000 for OTE, GERMANOS, CTS and COSMOTE E-Value or exceeding €30,000 for ICT projects and €10,000 for Telekom Romania Mobile Communications, as well as 100% of prospective consultants regardless of the purchase value, were reviewed and checked, unless they had been checked within the last 2 years.

Supplier Capacity Building Programs

In addition to established supplier training initiatives, OTE Group is actively participating in the CSR Hellas initiative "Partnership and Action for Sustainable Enterprises". Since October 2024, under Axis III of the program, the initiative has focused on advancing sustainability across supply chains by engaging SMEs through partnerships, knowledge sharing, and performance enhancement. Nine OTE Group suppliers have joined the program.

4. Business Continuity

OTE Group maintains a strong commitment to Business Continuity as a key element of operational resilience and long-term value creation. The Group's Business Continuity Management System (BCMS), certified under ISO 22301:2019 across major subsidiaries (OTE, CTS, GERMANOS, COSMOTE e-Value), enables the systematic identification, assessment, and mitigation of risks that could disrupt critical services.

Understanding the strategic importance of telecommunications for the economy and society, OTE Group embeds Business Continuity into its governance and operational framework. This proactive approach ensures uninterrupted service delivery, protects stakeholder confidence, and enhances public trust in the Group's capabilities.

The Business Continuity Management System (BCMS) provides a consistent and structured method for identifying threats to protect against, reduce the likelihood of, timely respond to, and recover from adverse events and disruptions. Through the implementation of this Management System, OTE Group is committed to enhancing the organization's resilience and minimizing the potential impact of threats on business operations.

As part of this method, the OTE Group Business Continuity team implements and maintains a systematic process to assess the risk of disruption and analyse the business impacts. A digital tool will be used for conducting Business Impact Analyses, and respective Business Continuity Plans (BCPs) to be implemented when dealing with disruptive incidents. A dedicated operational structure is in place to prioritize the necessary actions during incident management. Key performance indicators (KPIs) and the internally developed BCMS Maturity Tool are used to monitor and evaluate system performance and effectiveness.

The Group collaborates closely with public authorities and participates in interdepartmental and international working groups to exchange practices and enhance resilience. Awareness initiatives include training for new employees, the publication of articles and guidelines via the Group's intranet, participation in global initiatives like the BCAW and targeted awareness campaigns for specific internal audiences. These efforts aim to promote a culture of preparedness across all business functions.

Complementing these efforts, the Group maintains annual Network Recovery and IT Disaster Recovery Programs to ensure the availability of critical IT infrastructure. These initiatives support end-to-end service continuity and provide a reliable foundation for business-critical operations. In 2024, OTE Group reported an average interruption frequency of 0.0788 times per month and a customer average interruption duration of 6.72 minutes, highlighting the robustness of its operational continuity measures.

5. Data Security and Privacy

This section contains information complementary to the [Sustainability Statement](#) and the [Transparency Report](#).

Data protection and data security are extremely important to OTE Group. Strict data protection and security requirements are integrated both in the development of its products and services and into their use by customers. Customers can be informed about how OTE Group processes their data in the respective [Data Privacy Notice](#).

Compliance monitoring activities are essential to ensuring adherence to the data privacy and security framework. The security, data privacy, and internal audit functions conduct audits and assessments that cover these critical areas. The results of these reviews help maintain a high level of data privacy and security. Furthermore, OTE Group Companies (OTE, COSMOTE e-Value, CTS, CGS and GERMANOS) apply an enterprise information security management system according to ISO/IEC 27001:2013 requirements and a privacy information management system based on ISO 27701 (except for CGS), certified on an annual basis from an independent body.

To stay ahead of unconventional cyber threats, the Security Operations Center (SOC) operates 24/7. Networks and telecommunication infrastructure are continuously monitored for unusual activity or vulnerabilities that may indicate a potential compromise. In such cases, the expert personnel overseeing security operations ensure that any event is promptly identified, analyzed, addressed, and reported, all within the Group's defined risk tolerance levels. Additionally, OTE Group offers SOC services to other companies, helping them defend against cyberattacks.

Additionally, in 2024, OTE investigated 3 customer requests, regarding the confidentiality of communications/security of customer data, and 33 requests from the Hellenic Authority for Communication Security and Privacy (ADAE). OTE and COSMOTE also handled 23 complaints that were submitted to the Hellenic Data Protection Authority (DPA).

In 2024, OTE reported 22 incidents to the DPA and the ADAE, by adhering to GDPR and L.3471/2006 for the protection of personal data and privacy in the electronic telecommunications sector. 100% of those incidents involved personally identifiable information, with a total number of 22 customers affected. During the reporting year, no significant cases of data breaches occurred.

During the year, €325k total fines were imposed by ADAE for incidents of SIM Swapping, unauthorized Call Forwarding, Improper use of Personal Data and Communication Data Breach that occurred in the years 2020, 2021 and 2022.

Indexes

ATHEX Index

OTE Group reports its ESG disclosures and practices in line with the Guide's recommendations (version 2024). Detailed information can be found in the table below.

Topic	ESG Metric ID	Metric Title	Section / Comments
Environmental			
Core Metrics	C-E1	Scope 1 emissions	Scope 1 emissions: 20,693 t CO_2 eq GHG intensity of scope 1 emissions: 4.21 t CO_2 eq per million EUR Annual Financial Report 2024 / Annual Report of the Board of Directors / Financial and Operational Highlights of 2024 and Sustainability Statement 2024, E1-6
	C-E2	Scope 2 emissions	Scope 2 emissions (location-based): 145,882 t CO_2 eq Scope 2 emissions (market-based): 86 t CO_2 eq GHG intensity of scope 2 emissions: 40.63 t CO_2 eq per million EUR (location-based) GHG intensity of scope 2 emissions: 0.024 t CO_2 eq per million EUR (market-based) Annual Financial Report 2024 / Annual Report of the Board of Directors / Financial and Operational Highlights of 2024 and Sustainability Statement 2024, E1-6
	C-E3	Energy consumption and production	Energy consumption: 497,008 MWh Percentage of electricity consumed: 90% Percentage of renewable energy consumed: 90% Total amount of energy produced: 1,209 MWh Total percentage of energy produced from RES: 100% Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, E1-5
Advanced Metrics	A-E1	Scope 3 emissions	Total scope 3 emissions: 459,302 t CO_2 eq GHG intensity of scope 3 emissions: 137.91 t CO_2 eq per million EUR Annual Financial Report 2024 / Annual Report of the Board of Directors / Financial and Operational Highlights of 2024 and Sustainability Statement 2024, E1-6
	A-E2	Climate change risks and opportunities	Annual Financial Report 2024 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2024, ESRS 2 IRO-1 E1, ESRS 2 SBM-3 E1 Detailed information concerning climate change risks and opportunities identified, can be found in the latest response of OTE to CDP.
	A-E3	Waste management	Hazardous waste: 1,415.31 t Non-hazardous waste: 5,893.61 t Total waste, % recycled: 88% Total waste, % composted: 0% Total waste, % incinerated: 10% Total waste, % landfilled: 2% Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, E5-5
	A-E4	Effluent discharge	Other Environmental Aspects - Water
	A-E5	Biodiversity sensitive areas	Other Environmental Aspects - Biodiversity
	A-E6	Climate change policy	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, E1-1, 2, 3, 4 Energy and Climate Change

Topic	ESG Metric ID	Metric Title	Section / Comments
	A-E7	Removals and carbon credits	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, E1-7
	A-E8	Total GHG emissions	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, E1-6
Sector-specific	SS–E7	Critical materials	OTE Group does not use or manage critical materials as OTE Group companies do not actually manufacture any products themselves.
Social			
Core Metrics	C-S1	Stakeholder engagement	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS 2 SBM-2, S1-2, S2-2, S4-2 OTE Group Internal Regulation of Operations, Article 36: Communication Channels
	C-S2	Female employees	40% / Sustainability Statement 2024, S1-6
	C-S3	Female employees in management positions	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, S1-9 Supplementary HR Data
	C-S4	Employee turnover	Supplementary HR Data
	C-S5	Employee training	Supplementary HR Data Average training hours of employees (excl. top management): 35.1
	C-S6	Human rights policy	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, S1-1 OTE Group Code of Human Rights Human Rights
	C-S7	Collective bargaining agreements	Supplementary HR Data
	C-S8	Supplier assessment	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, S2-1, 2, 3, 4 OTE Group Supplier Code of Conduct Responsible Purchasing and Supply Chain
Advanced Metrics	A-S1	Sustainable economic activity	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, Disclosures pursuant to Article 8 of Regulation 2020/852 (Taxonomy Regulation)
	A-S2	Employee training expenditure	Supplementary HR Data
	A-S3	Gender pay gap	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, S1-16
	A-S4	CEO pay ratio	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, S1-16
Sector-specific Metrics	SS-S3	Legal requests of user data	Transparency Report Greece Data Security and Privacy
	SS-S5	Data security and privacy fines	Data Security and Privacy
	SS-S9	Grievance mechanism	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, S4-3

Topic	ESG Metric ID	Metric Title	Section / Comments
Governance			
Core Metrics	C-G1	Board composition	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS 2 GOV-1 and Corporate Governance Statement, Board of Directors and Committees that consist of members of the Board of Directors – Remuneration of the Board Members/ Remuneration of executive Board Members - Other administrative, managerial or supervising corporate bodies or committees, Diversity policy with respect to the administrative, managerial and oversight bodies corporate Average tenure of board members: 4.2 years
	C-G2	Sustainability oversight	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS 2 GOV-1
	C-G3	Materiality	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS 2 SBM-3, ESRS 2 IRO-1, ESRS 2 IRO-1 E1, ESRS 2 IRO-2, ESRS 2 SBM-3 E1
	C-G4	Sustainability policy	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS 2 GOV-1, ESRS 2 SBM-1 OTE Group Compliance Policies OTE Group Internal Regulation of Operations, Article 35: Sustainability Policy
	C-G5	Business ethics policy	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, S1-1 OTE Group Compliance Policies
	C-G6	Data security policy	Annual Financial Report 2024 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2024, ESRS S4-1, 2, 3, 4 OTE Group Information Security and Personal Data Protection Data Security and Privacy
	C-G7	Sustainability reporting	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS 2 BP-1
	C-G8	Financial reporting	February 26, 2025
Advanced Metrics	A-G1	Business model	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS 2 SBM-1
	A-G2	Business ethics violations	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS G1-4 Compliance Human Rights
	A-G3	ESG targets	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS 2 SBM-1, E1-4, E5-3, S1-5, S4-5
	A-G4	Variable pay	Annual Financial Report 2024 / Annual Report of the Board of Directors / Corporate Governance Statement, Compensation of Executive Members of the Board of Directors for year 2024 Remuneration Report for the Members of the Board of Directors for the fiscal year 2024
	A-G5	External assurance	Annual Financial Report 2024 / Auditor's Report / Independent Auditor's Limited Assurance Report on Sustainability Statement
	A-G6	ESG bonds	OTE Group has not issued an ESG bond yet.

Topic	ESG Metric ID	Metric Title	Section / Comments
	A-G7	Integration of sustainability-related performance in incentive schemes	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, GOV-3 and Corporate Governance Statement, Compensation of Executive Members of the Board of Directors for year 2024 Remuneration Report for the Members of the Board of Directors for the fiscal year 2024
Sector-specific Metrics	SS-G1	Whistleblower policy	Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS 2 SBM-3 G1, G1-1, 3
	SS-G3	Systemic risk management	Annual Financial Report 2024 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2024, ESRS 2 GOV-1 and Corporate Governance Statement, Internal Control System

SASB Index

The table below presents the response of OTE Group in relation to the sector-specific criteria of the Telecommunications Sustainability Accounting Standard (version 2023-12) issued by SASB (Sustainability Accounting Standards Board).

Code	Telecommunication Services SASB Metric	Disclosure
Environmental Footprint of Operations		
TC-TL-130a.1	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	1,789,229 GJ 89% 90% Annual Financial Report 2024 / Annual Report of the Board of Directors / Sustainability Statement 2024, E1-5
Data Privacy		
TC-TL-220a.1	Description of policies and practices relating to behavioral advertising and customer privacy	Annual Financial Report 2024 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2024, ESRS S4-1, 2, 3, 4 OTE Group Information Security and Personal Data Protection Data Security and Privacy
TC-TL-220a.2	Number of customers whose information is used for secondary purposes	Quantitative data not publicly available.
TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Data Security and Privacy
TC-TL-220a.4	(1) Number of law enforcement requests for customer information, (2) number of customers whose information was requested, (3) percentage resulting in disclosure	Transparency Report Greece
Data Security		
TC-TL-230a.1	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of customers affected	Data Security and Privacy
TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Annual Financial Report 2024 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2024, ESRS S4-1, 4
Product End-of- life Management		
TC-TL-440a.1	(1) Materials recovered through take back programs, percentage of recovered materials that were (2) reused, (3) recycled, and (4) landfilled	Circular economy – Circularity in own operations
Competitive Behavior & Open Internet		
TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	Compliance
TC-TL-520a.2	Average actual sustained download speed of (1) owned and commercially associated content and (2) non-associated content	Mobile Average Download speed: H1 2024: 106.27 Mbps H2 2024: 109.68 Mbps No distinction is made between associated and non-associated content. Data on fixed download speed not publicly available.

Code	Telecommunication Services SASB Metric	Disclosure
TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating and related practices	Annual Financial Report 2024 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2024, ESRS 2 SBM-3 S4 OTE Group Code of Conduct for Electronic Commerce Net neutrality and open internet
Managing Systemic Risks from Technology Disruptions		
TC-TL-550a.1	(1) System average interruption frequency, (2) customer average interruption duration and (3) customer average interruption duration	Business Continuity
TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	Annual Financial Report 2024 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year Business Continuity
Activity Metrics		
TC-TL-000.A	Number of wireless subscribers	Annual Financial Report 2024 / Financial and Operational Highlights of 2024, Greece, Romania Mobile
TC-TL-000.B	Number of wireline subscribers	Annual Financial Report 2024 / Financial and Operational Highlights of 2024, Greece
TC-TL-000.C	Number of broadband subscribers	Annual Financial Report 2024 / Financial and Operational Highlights of 2024, Greece
TC-TL-000.D	Network traffic	OTE Group 13,570 PB OTE Group in Greece 13,190 PB