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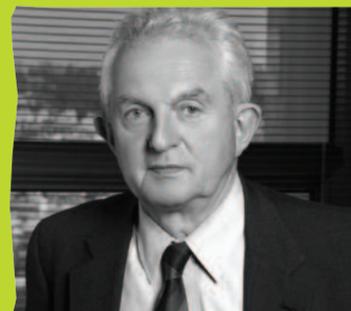
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# messages

## A. Message from the Chairman

At a time when the term Corporate Responsibility was not common and businesses' main concerns were their financial performance and the narrow interests of their shareholders, OTE contributed to the development of Greece, as few companies have. By deploying fixed telephony everywhere, even to most remote of villages, OTE enabled all citizens to have equal opportunities and possibilities. The tradition of giving back to society and citizens alike, that accompanies OTE Group to date, has also become an integral part of COSMOTE.

However, the past cannot be a reason for being complacent: OTE and COSMOTE, following the signs of our times, have expanded their activities and contribution to areas such as the workplace, society, the marketplace and the environment. Through the publication of their Corporate Responsibility Reports, they present with openness and transparency their respective actions and most importantly, the measurable results those actions achieve.



**Panagis Vourloumis**  
Chairman of the COSMOTE Board of Directors

## B. Message from the CEO

After 16 years in the Greek market, mobile telephony has already moved on from achieving only its main objective of providing seamless and top-quality communication services to all. Today, our industry plays a vital role in the country's economic development, supports entrepreneurship through important investments, transfers know-how, creates new jobs, and plays an important role as a corporate citizen. The challenge for every responsible telecoms operator, including COSMOTE, is not only to ensure its business success, but also to have a positive impact on society and contribute in the tackling of important social and other issues.

We correspond with attention and holistic programs to critical issues, such as Climatic Change, while at the same time inform appropriately citizens, about issues caused by the rapid growth of our business sector, such as safe operation of mobile telephony networks, as well as safe use of mobile telephony services and technology, by minors. To respond to these challenges, we further diffuse responsibility practices in our sphere of influence, institutionalize quantitative objectives, for programs implemented, progressively expand our measurement system to all our programs and subsidiary companies, in Greece and abroad. All above, through continuous contact and open dialogue with stakeholders and groups, who's needs and thoughts are recorded and transformed into action.

I would like to emphasize two issues, the first one being the environment. Its protection constitutes a vital need, which requires involvement and action by everybody, without any exceptions. Therefore, COSMOTE has invested to develop a holistic environmental policy, with an explicit objective: our enterprising growth not to have a negative impact on the environment, while at the same time sensitizing our fellow-citizens on the issue of environmental protection. Regarding mobile telephony network operations, we monitor the dimension of citizens' concerns on the safety of base stations. For this reason, we do much more than monitoring levels of emitted radio waves, in order to ensure strict compliance with safety limits. Moreover, we inform responsibly and systematically citizens and our employees, about issues of mobile telephony and health, conduct dialogue with local societies and responsible authorities and transfer know-how, also from the responsible international scientific institutions, such as the World Health Organisation.

There is a lot more to achieve so we do not stop here. For COSMOTE, Corporate Responsibility is neither an optional extra nor something only our size and financial indicators allow. More importantly, CR is embedded in our values, operations, structures and processes. It is one with our sustainability, growth and innovation and carries our commitment to grow with responsibility and make a change with measurable results. To maintain our two-way communication with our stakeholders and the millions of people who trust their communication in our hands.



**Michael Tsamaz**  
COSMOTE Chief Executive Officer

# explanations

## C. Point of Contact-GRI Level

COSMOTE's present Corporate Responsibility Report, is the 4th report our company issues. Its content reflects the overall perception our company has, about the essence of Corporate Responsibility (CR) and the programs we implement, in order to support the world's sustainable development and our company's responsible operation.

### Report Scope

This CR Report:

- refers to the period 1/1/2008-31/12/2008 (unless otherwise indicated in certain points)
- refers to all activities of COSMOTE in Greece, and partially to operations of our subsidiaries abroad and our subsidiary GERMANOS in Greece.

### Report Principles

To facilitate the evaluation of its content, our Report follows the basic principles, guidelines and directives "Sustainability Reporting Guidelines" (publication G3, 2006) of the Global Reporting Initiative (GRI), while the following have also been used:

- for the principles of the Report, the UN's Global Compact
- for the content of the Report, the AA1000-Assurance Standard of AccountAbility
- for the presentation of Report data, the EFQM's RADAR Card.

### Report Development

In our continuous effort to improve our Report, we particularly emphasized this year:

- presenting more quantitative results within the Report (*see section II-2C*)
- using internationally recognized guidelines on Corporate Responsibility
- responding to issues raised by our Stakeholders in 2008 (*see section II-4A*)
- in the balanced presentation of all Corporate Responsibility areas.

### Report Restrictions

Our company recognizes limitations in the Report it publishes (limitations, it intends to handle in future publications), such as:

- expansion of its quantitative measurement system
- validation of quantitative elements, by an independent institution
- alignment of quantitative indicators, throughout its subsidiaries.

### Data Presentation

This CR Report:

- contains, as a norm, quantitative results for all indicators presented, for the past three years
- covers elements from all our company's operations (network, offices, sales, after sales)
- summarises in a table (*see section VII-1*) absolute figures of consumption, whereas in the main body of the Report, also efficiency figures are presented.

## GRI Application Level

The level of application for our company's CR Report according to the «Sustainability Reporting Guidelines» of the Global Reporting Initiative (GRI), is indicated in the following table. This application level has also been checked by the GRI itself.

		2003 in accordance		C	C+	B	B+	A	A+
Mandatory	Self Declared								
	Third Party Checked								
	GRI Checked								
					Report externally assured		Report externally assured		Report externally assured

### Feedback

The CR Report is one of the main tools to discuss and collaborate with our Stakeholders, but also a means to communicate with them. For this reason, we welcome potential comments, thoughts and remarks.

### Reading of the Report

For convenient reading of this Report, please pay attention to the following terms and symbols, which are widely used:

### Terms

- The terms "company", "we", "COSMOTE" and "COSMOTE Group", refer to COSMOTE's activities in Greece and abroad (which this Report addresses).
- The term "COSMOTE Greece", refers to COSMOTE's activities in Greece, except its GERMANOS subsidiary.
- The term "OTE Group" refers to OTE Group, to which COSMOTE constitutes a subsidiary.

- The terms "Report" and "CR Report" refer to the present 2008 Corporate Responsibility Report.
- Terms indicated as "II-3, V-2" etc refer to the area and section of this Report (e.g. used in the GRI, Global Compact and Stakeholder Tables). For example, the term "III-2A" makes reference to area III (Environment), section 2 (Water) and paragraph A.

### Symbols



For further information, please visit COSMOTE's website [www.cosmote.gr](http://www.cosmote.gr)



Case Studies of our company are indicated.



Please forward your comments to...

**Mrs Anna Malti**

CR Manager COSMOTE S.A.

44, Kifisias Ave. Marousi 151 25, Athens, Greece

T: +30 210 61.77.777, Fax: +30 210 61.77.239

E-mail: [csr@cosmote.gr](mailto:csr@cosmote.gr)

# I introduction



## 1. Mobile Telephony

Mobile telephony constitutes one of the most important technological achievements of our generation and continues to grow, at an impressive pace, around the world. The provision of new products and services, which correspond to needs and requirements of consumers, have led to the worldwide increase in penetration of mobile telephony.

According to a United Nations study, published in March 2009, over 50% of the world's population use mobile phones, while mobile telephony has resulted significant changes in society, especially in developing countries, where lack of telecommunication infrastructure is considered being an obstacle for economic development.

In Greece, as well as in the other 3 countries (Albania, Bulgaria, Romania), where COSMOTE operates, mobile telephony has developed rapidly, covering telecommunication needs of citizens and becoming an integral part of their everyday life.

In these 4 countries, where some of the biggest European telecommunication providers are also active, mobile penetration has already exceeded the 100% limit: Greece (172%), Bulgaria (142%) and Romania (133%). Only in Greece, this percentage corresponds to over 18.85 million connections, at the end of 2008.

Mobile telephony, apart from providing high quality communication for everyone, facilitates business operations and contributes to economic growth, through significant investments, know-how transfer and creation of new job positions. However, on the other hand, the rapid increase of mobile penetration results a negative effect on energy consumption and mainly on waste creation, from disposed devices and their packaging, while the use of internet bears safety issues for children. Handling these issues constitutes an important challenge for all mobile telephony companies around the world, among which also for COSMOTE.

## 2. Our Company

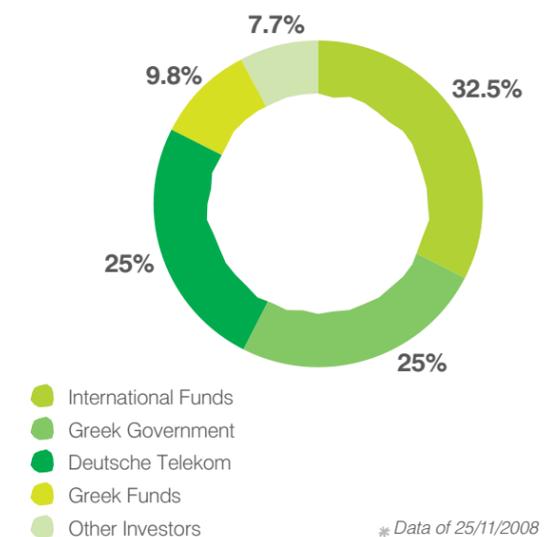
### A. Shareholder structure

COSMOTE started its commercial operation in April 1998, with headquarters in Athens. Within a short time, the company accomplished not only to conquer the first place in the Greek mobile telephony market, but also to expand its operations abroad, achieving a significant presence in the SE Europe region.

The company is member of OTE Group (Hellenic Telecommunications Organization), which possesses 100% of our company's shares. OTE Group constitutes the largest telecommunication service provider in the South-East Europe region, employing over 30,000 individuals (with extensive know-how and experience), in 4 countries (Greece, Albania, Bulgaria and Romania), while also possesses a worth mentioning shareholder stake, at the Serbian Telecommunications Organisation.

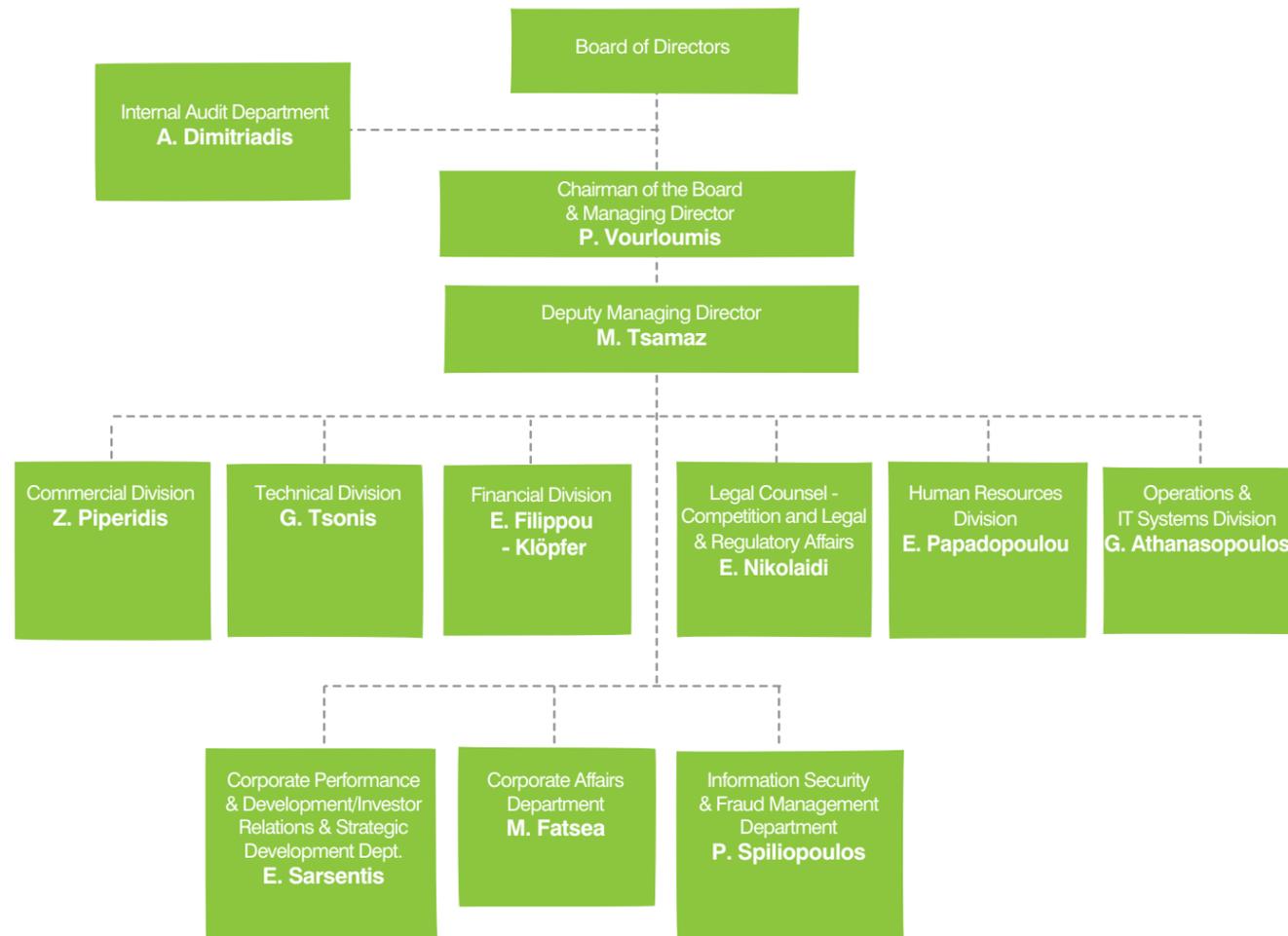
In June 2008, the Greek Parliament ratified the agreement to transfer 25.0000004% of OTE Group's shares from the Greek State to Deutsche Telekom A.G. Consequently, participants in OTE Group's Shareholder structure (and respective voting rights), became as follows:

Shareholder Structure - OTE Group



## B. Organizational structure

COSMOTE's organizational structure in 2008 is depicted below:



## C. Significant changes

Main changes within 2008, related to organisational, shareholder and management aspects of our company, were the following:

OTE Group announced possession of 100% of shares and corresponding voting rights of COSMOTE, after completing an optional public offering process, for the acquisition of all common stocks of COSMOTE within the stock exchange market, according to law N.3461/2006.

On April 1st 2008, roughly eight years after our company's Initial Public Offering, our stocks ceased trading on the stock exchange market. Between 2000 and 2008, our stock price, following the dynamic growth of our company, rose roughly by 179%, whereas the Stock Exchange Market grew, within the same period, roughly by 2.6%.

In June 2008, the Greek Parliament ratified the agreement to transfer 25.0000004% of OTE Group's shares from the Greek State to Deutsche Telekom A.G., as well as the corresponding voting rights.

## 3. Products and Services

### A. Main products and services

COSMOTE covers all spectrum of mobile telephony products and services, from planning a network, developing a network, selling services and offering after-sales services.

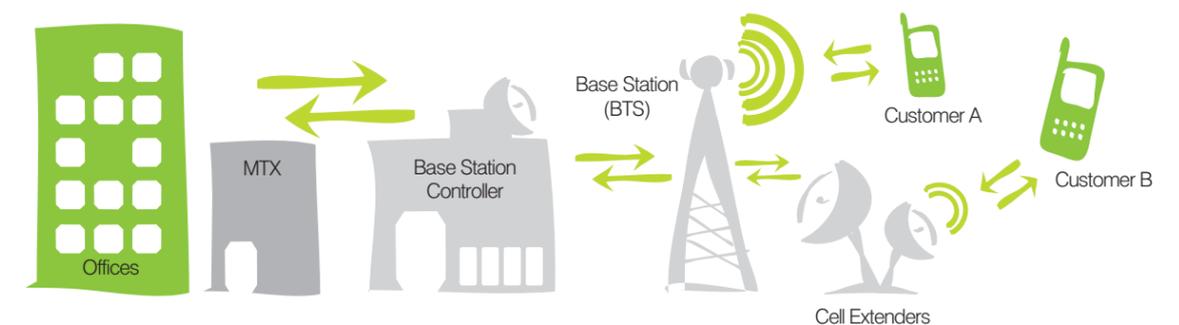
Our main products and services are described below:

- Post Paid Services, for retail and corporate customers.
- Pre Paid Services.
- Value Added Services, such as SMS, mobile internet, video calls etc.
- Roaming Services.
- Accessories, such as headphones, Bluetooth products, chargers, data transfer products etc.

### B. Buildings and network

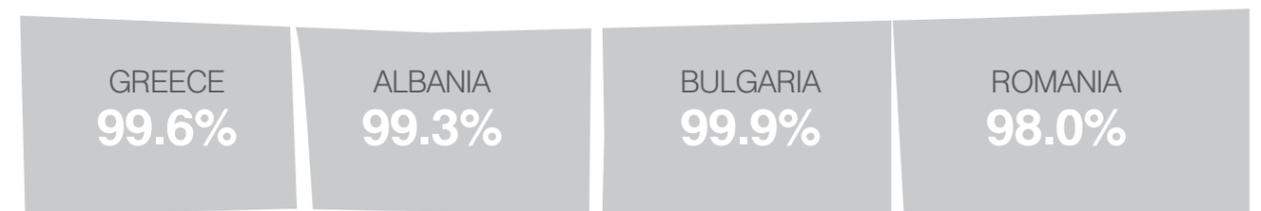
Our company has developed privately-owned, mobile telephony networks in countries we operate in. These networks are mainly divided in a Backbone Network (MTX controllers etc.) and thousands of Base Stations (BTS), which ensure the unhindered provision of our services. Besides these Networks, our company also owns buildings, where administrative operations are allocated.

### Telecommunications network



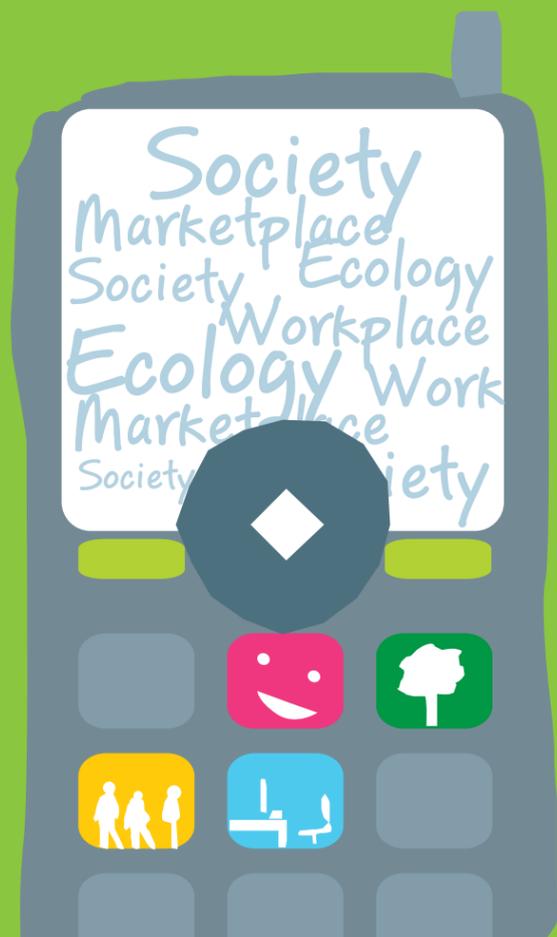
This way, COSMOTE offers extensive and satisfactory population coverage, in all countries it operates in.

### Population coverage (%)





our world *our management*



# How can we integrate responsibility in our everyday operations?

*briefly....*

- 11 stakeholder groups
- 4 pillars of Corporate Responsibility
- 4 members within the Corporate Responsibility section
- 39 fully covered GRI indicators

## Our philosophy

COSMOTE acts as a responsible corporate citizen from the beginning of its commercial operation, in order to contribute to our world's sustainable growth, to collaborate harmonically with its Stakeholders and to take into consideration economic, environmental and social parameters, in its decision-making processes.

## Our objective

To operate in an responsible way, to be accountable for the potential impact our operations have and at the same time improve our competitiveness and ensure our growth.

## Our achievements in 2008:

- We renewed our certifications according to ISO9001, ISO14001, OHSAS18001.
- All our employees follow our Code of Conduct.
- We made reference to three times more quantitative indicators (and more than double GRI Indicators) in our Report, in comparison to 2007.
- We improved our classification in the Accountability Rating Greece, by one place (from 6th to 5th position).
- We developed a concrete Corporate Responsibility Framework, specifically for our company.

# 1. Responsibility Framework

## A. We precisely define the areas of Corporate Responsibility

Corporate Responsibility constitutes a fundamental corporate principle, which embraces all our operations and influences our attitude towards social and environmental issues.

Within COSMOTE, we have clearly defined what Corporate Responsibility means for us, in order to streamline our actions, facilitate a homogeneous understanding by our employees and focus on adding value to our Stakeholders.

## Corporate Responsibility for COSMOTE

Corporate Responsibility is the commitment of our company to contribute to global sustainable development, by taking economic, ecological and social objectives into consideration in our decision-making processes, to take responsibility for the impact of our organisation's activities, by working and communicating with internal and external Stakeholders, while at the same time improving the competitiveness of our company.

The main Pillars of Corporate Responsibility, were determined through a process which combined internal analysis and dialogue with our Stakeholders and are described below:



The present Report describes our Philosophy, Programs and Practices implemented, in these four Pillars and the related Sections, which are further recognized through an Impact Assessment, conducted by our company every 3 years. The outcome of this analysis is summarised in the following Framework, which is used by our company to manage systematically Corporate Responsibility issues, in an effort to avoid focusing on topics, not related to the nature of our business.



# 2. Management Approach

## A. We incorporate Corporate Responsibility in our structure

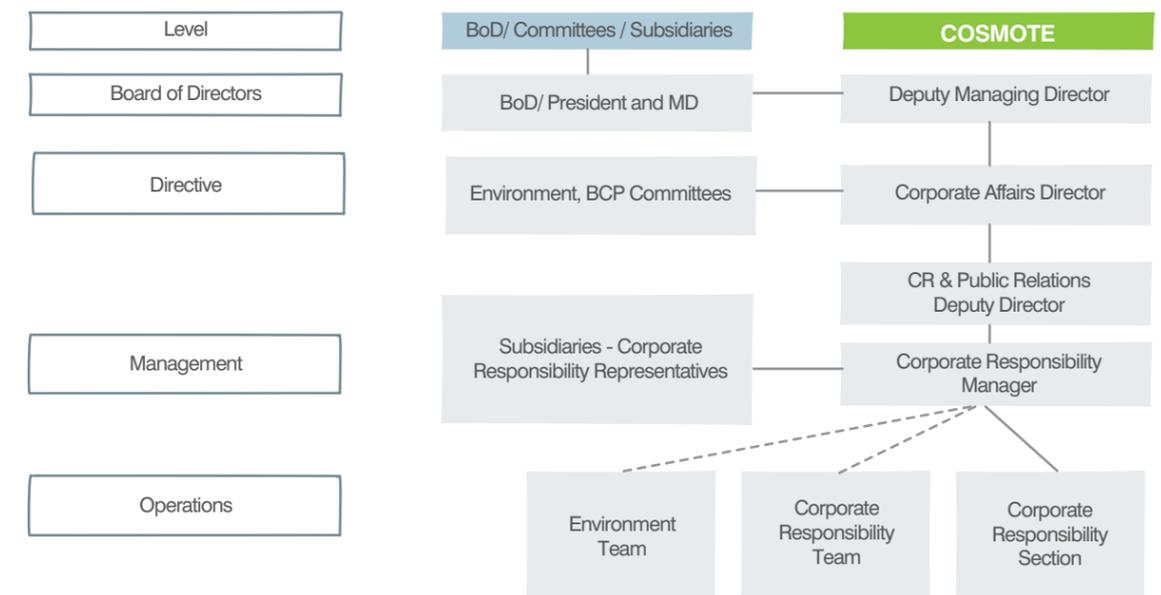
Since 2004, we have established a separate Corporate Responsibility Section, which ensures our company handles Corporate Responsibility issues systematically, at a strategic, organisational and operational level. We have also established a Corporate Responsibility Team, from the beginning of 2006, with representatives from all company functions, aiming to:

- a) integrate the principle of Corporate Responsibility, within functions of our company
- b) sensitize systematically our employees on responsibility issues.

Our company has also established a number of inter-departmental teams, which ensure that more specific issues are managed, in a responsible and systematic way:

- a) An Environmental Management Committee and Team, responsible to ensure the application of environmental policies.
- b) A Business Continuity Committee and Team, responsible for planning and implementing Operational Continuity plans, in order to protect the company from unexpected events.
- c) A Health and Safety Committee and Team, responsible for applying health and safety policies and processes.

The Health and Safety Committee constitutes of 7 members, which are elected by our company's employees, every 2 years. Overall, the management structure of Corporate Responsibility, at a directive, management and operational level in 2008, is indicated below:



## B. We integrate Corporate Responsibility in our way of management

For our company, Corporate Responsibility does not constitute an isolated activity. On the contrary, we strive to integrate the parameter of responsible operation in our everyday activities and in our management practices.

### Our Code of Conduct

We recognize that both ensuring our corporate long-term success, as well as safeguarding our Stakeholders' interests, is closely related to the extend our managers and employees will follow the principles of Corporate Responsibility and ethics.

For this reason, we have developed a Code of Conduct, which constitutes a statement of our values and principles and defines the way our managers and employees should behave, on a daily basis. The Code is communicated to all new employees and is available in our Website, as well as our corporate Intranet. All employees are subject to the Code, despite contract type (permanent, part time), hierarchical level, country of employment etc. At the same time, we have developed a whistle blowing mechanism, to identify gaps in implementation of our Code.

The sections of this Code are:

- Our enterprising principles.
- Behaviour towards colleagues.
- Behaviour of management towards employees.
- Behaviour of employees towards the company.
- Behaviour towards customers.
- Behaviour towards shareholders and investment community.
- Behaviour towards suppliers and partners.
- Behaviour towards competitors.
- Behaviour towards authorities.
- Behaviour towards the media.
- Behaviour towards the environment.

### Our Code of Conduct defines among other:

- ✓ We conduct our business activities with sincerity, respect and integrity.
- ✓ We respect the laws and adopt principles of corporate ethics.
- ✓ We do not tolerate bribery and corruption.
- ✓ We collaborate with each other and cultivate a team spirit.
- ✓ We keep our promises and are sincere.

### Management Systems

We have developed Management Systems, which are certified by respectful bodies and help us manage our operations in a systematic way, including issues related to Corporate Responsibility, such as environmental management and employees' health and safety.

More specifically, we apply the following systems:

#### ISO 9001:2008

Quality Management System, certified by the Hellenic Standardisation Body (ELOT).

#### ISO 14001:2004

Environmental Management System, certified by TUV Hellas/TUV NORD.

#### OHSAS 18001:1999

Health & Safety Management System, certified by TUV Hellas/TUV NORD.



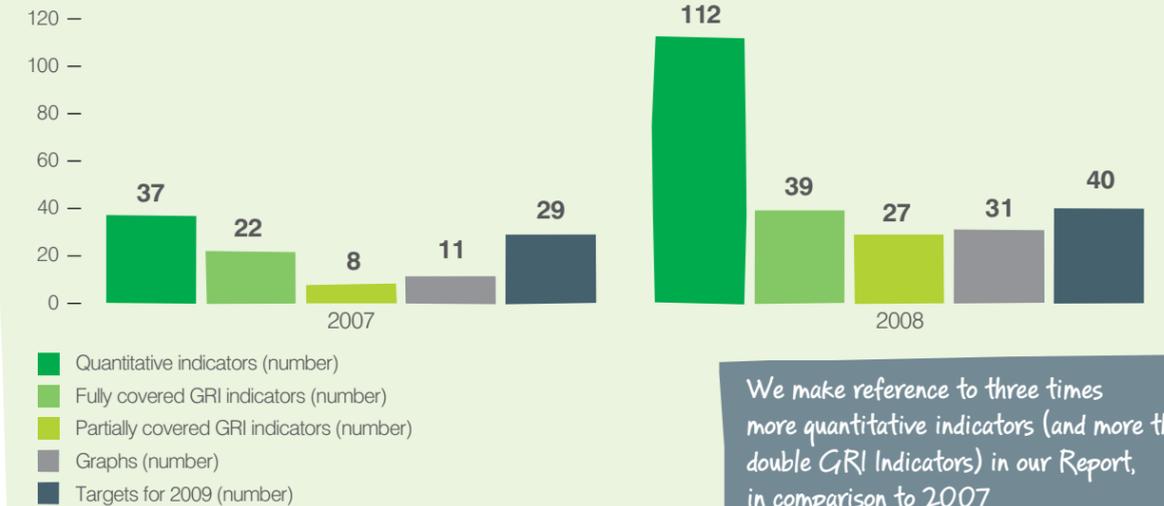
## C. We focus on measurable results



### Focus on quantitative data

COSMOTE recognizes the international trend of Corporate Responsibility Reports to include reliable, complete and measurable indicators, in order to be transparent to Stakeholders. For this reason, our company gradually includes more quantitative indicators and objectives in its Report, as indicated in the following graph. As a result, the number of quantitative indicators referred to within the 2008 Report, increased three times, while the number of GRI indicators more than doubled, in comparison to 2007.

#### Quantitative Data within the Report



We make reference to three times more quantitative indicators (and more than double GRI Indicators) in our Report, in comparison to 2007

## 3. Recognition-Membership

### A. Our efforts are recognized

Recognition of our efforts on becoming more responsible, gives us satisfaction and energy to continue the application of our long term programs.

In 2008, we received a number of recognitions, such as:

- At the conference "CEO & CSR 2008: The CSR in Corporate Strategy", organised by the magazine "MONEY", we were honoured with the 2nd Award in the category Best CSR Practice / CSR Initiative / Sustainable Practice, for our "Smart Eyes" program.
- At the Accountability Rating Greece 2008 process, organised for the second year by the Institute of Social Innovation, COSMOTE Greece was ranked at the 5th place, improving by one its position, compared to 2007.

- At the annual Global Telecoms Business Innovation Awards in London, our "Smart Eyes" program (for visually impaired individuals) received the Award "Special Service Innovation".

The same program received the Award "Assistive Technology Innovation Award in Transportation", at the ACCESS-IT 2008 forum, in Brussels.



The award ceremony at the "Global Telecoms Business Innovation Awards" in London.

## B. We participate in International and National institutions

Our company participates in a number of International & National Organizations and Institutions, through which we also seek to promote, the importance of Corporate Responsibility.

Indicatively, we are members in the following organizations and institutions:

### ■ GSM - Europe (GSM-E)

Our company is member of the European Association of Mobile Communications Services and participates actively in many of its work groups.

### ■ Association of Mobile Telephony Companies (EEKT)

Our company is a founding member of the newly established association, which aims to strengthen collaboration and promote issues of common interest, among mobile telephony providers in Greece.

### ■ European Telecommunications Standards Institute (ETSI)

Our company is a member of the European Organisation for Telecommunications Standardization, since 1998.

### ■ Association of ICT Companies in Greece (S.E.P.E.).

### ■ Association of Greek Companies (S.E.V.)

Our company participates in the Committees of Wireless Communications and Mobile Communications.

### ■ Hellenic Network for Corporate Social Responsibility.

### ■ Hellenic branch of UN's Global Compact.

### ■ Greek Node for Safer Internet (www.saferinternet.gr).

Our company is also a member of the advisory board.



## 4. Stakeholder Engagement

### A. We conduct dialogue with our Stakeholders

Our Code of Conduct, has been communicated to all our employees (see section II-2B) and addresses behavioural principles, on which our relationship with Stakeholders, is based upon.

Today, Stakeholders (which are defined as those directly or indirectly affected by our decisions) require not only transparency, but also active involvement of companies on social issues, societal progress and environmental protection.

Responding to this requirement, we systematically identify expectations and questions of our Stakeholders and respond to them in various ways, one of them being also the present CR Report, as summarizing in the following table:

Stakeholder Group	Means of dialogue...	Topics raised ?	Section in this Report
<b>Customers (Corporate &amp; Retail)</b>	<ul style="list-style-type: none"> <li>Satisfaction Surveys</li> <li>Customer Service Center</li> <li>Corporate Responsibility Survey</li> </ul>	<ul style="list-style-type: none"> <li>Quality of services</li> <li>Mobile telephony operations</li> <li>Mobile phone etiquette</li> <li>Safe use of services</li> <li>EMF</li> </ul>	<b>Marketplace: VI-2,7</b> <b>Ecology: III-8</b>
<b>Commercial Network</b>	<ul style="list-style-type: none"> <li>Corporate Responsibility Survey</li> </ul>	<ul style="list-style-type: none"> <li>Transparency</li> <li>Governance</li> <li>Economic growth</li> </ul>	<b>Marketplace: VI-1,2</b> <b>Society: IV-3</b>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>Attendance in sector-based unions</li> <li>Meetings</li> <li>Corporate Responsibility Survey</li> </ul>	<ul style="list-style-type: none"> <li>Transparency</li> <li>Market Policy</li> <li>Economic growth</li> </ul>	<b>Marketplace: VI-2,3,4</b> <b>Society: IV-3</b>
<b>Employees</b>	<ul style="list-style-type: none"> <li>Employee Satisfaction Survey</li> <li>Corporate Responsibility Survey</li> <li>Organization of events</li> <li>Publication of informative forms</li> <li>Negotiation with representatives</li> <li>Meetings</li> </ul>	<ul style="list-style-type: none"> <li>Economic growth</li> <li>Health and Safety</li> <li>Equality</li> </ul>	<b>Workplace: V-2,5,3</b>
<b>Authorities</b>	<ul style="list-style-type: none"> <li>Discussion with representatives of national and local authorities</li> <li>Attendance in associations and unions</li> </ul>	<ul style="list-style-type: none"> <li>Transparency</li> <li>Governance</li> <li>Economic growth</li> </ul>	<b>Marketplace: VI-1,2</b> <b>Society: IV-3</b>
<b>Academia</b>	<ul style="list-style-type: none"> <li>Cooperation within programs</li> <li>Corporate Responsibility Survey</li> </ul>	<ul style="list-style-type: none"> <li>Ecology</li> <li>EMF</li> <li>Data security</li> </ul>	<b>Ecology: III-2-8</b> <b>Marketplace: VI-3,7</b>
<b>Local Communities</b>	<ul style="list-style-type: none"> <li>Organization of visits</li> <li>Meetings with local representatives</li> </ul>	<ul style="list-style-type: none"> <li>Environmental impact</li> <li>Support of local needs</li> <li>Support of local business enterprising</li> <li>EMF</li> </ul>	<b>Ecology: III-2,4,7,8</b> <b>Society: IV-1,6</b> <b>Marketplace: V-5</b>
<b>Public</b>	<ul style="list-style-type: none"> <li>Corporate Responsibility Survey</li> </ul>	<ul style="list-style-type: none"> <li>Environmental impact</li> <li>Social Contribution</li> <li>Growth</li> <li>EMF</li> </ul>	<b>Ecology: III-2-7</b> <b>Society: IV-1,3</b>
<b>Non Governmental Organizations</b>	<ul style="list-style-type: none"> <li>Collaborations</li> <li>Meetings</li> <li>Corporate Responsibility Survey</li> </ul>	<ul style="list-style-type: none"> <li>Environmental impact</li> <li>Water</li> <li>Use of resources</li> <li>Social Contribution</li> </ul>	<b>Ecology: III-2-8</b> <b>Society: IV-1</b>
<b>Media</b>	<ul style="list-style-type: none"> <li>Daily interaction</li> <li>Press Conferences</li> <li>Other events</li> <li>Informative leaflets</li> <li>Press Announcements (Press Releases)</li> <li>Corporate Responsibility Survey</li> </ul>	<ul style="list-style-type: none"> <li>All above</li> </ul>	<b>Management</b> <b>Ecology</b> <b>Marketplace</b> <b>Workplace</b> <b>Society</b>
<b>Shareholders (OTE / Deutsche Telekom)</b>	<ul style="list-style-type: none"> <li>Meetings of executives</li> <li>Adoption and utilisation of policies and principles</li> <li>Daily collaboration</li> </ul>	<ul style="list-style-type: none"> <li>All above</li> </ul>	<b>Management</b> <b>Ecology</b> <b>Marketplace</b> <b>Workplace</b> <b>Society</b>

## B. We monitor our Stakeholders' opinion

Our company participates and monitors surveys carried out by independent institutions, addressing our Stakeholders' perception, regarding our responsible operation. For example, within the survey "Social Barometer A.S.B.I.", COSMOTE is ranked as the third most responsible company in the Greek market and the first in the telecommunications sector.

At the same time, in order to maintain an open channel with our Stakeholders, we conduct a series of surveys, which tackle the public perception on critical social-environmental questions, as well as Stakeholders' expectations from corporations.

### More specifically, we materialised:

A qualitative survey based on personal in-depth interviews, among Stakeholders (80 interviews in the groups of NGO, Media, Academic Community, Employees, Suppliers, Corporate Customers, Commercial Network). Methodologically, the survey was a repetition of the 2006 survey, in order to utilise their comparison.

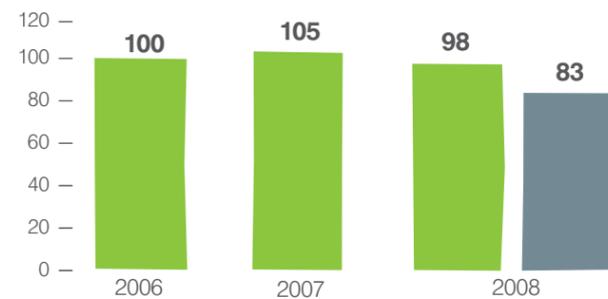
### Some of the survey findings are presented below:

- Knowledge of the term Corporate Responsibility, with few exceptions, was very good and the general attitude towards it is positive.
- Corporate responsibility should initially focus on each company's impact, and only after address wider social issues.
- Corporate Responsibility actions are considered all those actions which support society's main needs. Such needs are identified as being health, environment and social groups in need.

- An essential expectation from mobile telephony companies, is research and respective communication to the public, on the issue of mobile phone and Base Stations radiation (EMF).
- Environmental programs constitute the core of Corporate Responsibility, along with programs which support social groups in need.
- Communication campaigns are generally welcomed, but not essential, unless they focus on issues of health and environment.

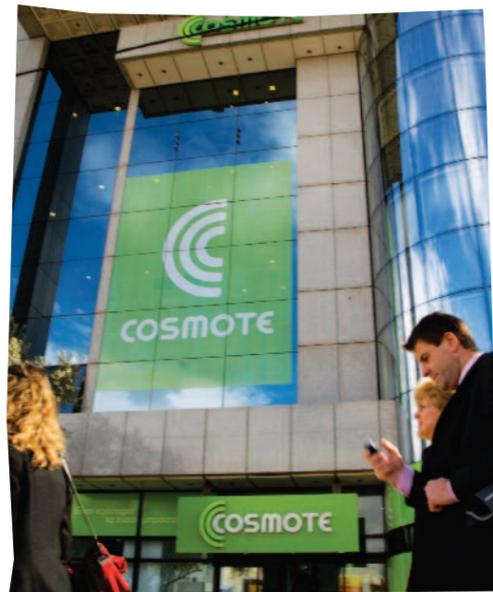
A quantitative public survey, with respective CR questions being integrated within the systematic marketing surveys, conducted by our company.

Corporate Responsibility Survey



- COSMOTE is "a company with social sensitivity" (%)
- 2nd best mobile telephony company in Greece (%)

\* Data refer to COSMOTE Greece and represent average yearly results.  
 \*\* Figure 100 is defined as the result of COSMOTE Greece, for the year 2006.



## 5. Targets 2008 and 2009

We said (in 2008)	We did (in 2008)	Progress	We will (in 2009)	Target Date
Certify all our operations, according to ISO 9001:2000.	See Section II-2B	100%	■ To improve our rating at the Greek Accountability Rating, by 10%.	2009
Become members in international Corporate Responsibility networks, such as the Global Compact.	See Section II-3B	100%	■ To increase the reference to GRI Indicators in the Report, by 20%.	2009
Conduct a systematic Stakeholder Engagement Survey, in order to analyze needs and expectations in relation to our company's role, as a responsible corporate citizen.	See Section II-4B	100%	<ul style="list-style-type: none"> <li>■ To conduct a new Stakeholder Engagement Survey.</li> <li>■ To expand the collection and data control system, related to our Corporate Responsibility Report.</li> <li>■ To export our management practices to our subsidiaries in Greece and Abroad.</li> <li>■ To conduct a CR Risk Assessment at COSMOTE Greece.</li> </ul>	2010 2009 2009 2009





our world *our ecology*



## How can we maintain our growth, without harming the environment?

*briefly...*

- 273 tones of packaging material
- 2.5 million liters of petrol
- 20 thousand cubic meters of water
- 150 GWh of energy
- 4 million EMF measurements

### Our philosophy

Due to the nature of telecom services, our company has a relatively low impact on the environment. However, our activities, products and services are analyzed, to identify interactions with the environment and prioritize programs to reduce our impact, applying credible and scientifically robust methods. At the same time, we utilize communication campaigns, in order to inform and sensitize the public on the issue of environmental protection.

### Our objective

Our objective is for our operations not to have a negative impact on the environment (or, where this is not feasible, to minimize the environmental impact, which inevitably occurs with most human activities) and at the same time sensitize our fellow citizens, on the topic of environmental protection.

### Our achievements in 2008:

- For the first time we monitored carbon emissions, deriving from all our activities.
- We operate photovoltaic panels in 37 Base Stations (installed over the last years), to utilise solar energy.
- We reduced total petrol consumption by 5.9%.
- We reduced electricity consumption per employee in our offices, by 14%.
- We reduced the average packaging weight of our products by 27% and net usage of materials by 24.1 tn.
- We recycled 48.4 tn of solid waste from our warehouse (77.6% of total solid waste produced).
- We recycled 46.7 tn of paper and increased paper recycling per employee, by 13.8%.
- We deployed our mobile recycling system in 100% of our COSMOTE and GERMANOS retail shops chains.
- We recycled 9.4 tn of mobiles-accessories and increased our collection per point, by 24%.
- We recycled 17.8 tn electrical and electronic devices (100% of the quantity we withdrew).
- We recycled 93.5 tn of batteries (100% of the quantity we withdrew).
- We re-used 40.2% of the ink cartridges we withdrew.
- We recycled 20,342 lt of oil-lubricants (100% of the quantity we withdrew).

# 1. Management System



## A. We operate in a systematic way

COSMOTE's commitment to protect the environment is expressed in its environmental Policy and is transformed into action through the development of an Environmental Management System for COSMOTE Greece, according to the ISO 14001 standard.

### COSMOTE's Environmental Policy

We, at COSMOTE, are committed to handle any effects our operations have on the environment, by taking into consideration the continuous improvement of our environmental services. This commitment defines the way we operate within COSMOTE.

#### Issues

Application of current legislation and participation in achieving national goals, constitutes the starting point for the development of our environmental policy.

- ✓ We recognize and measure our impact on the environment.
- ✓ We seek for ways to reduce our impact, by utilizing the best available techniques and practices:
  - Minimizing pollution and waste we emit to the environment
  - Reducing unnecessary use of raw materials and energy consumption
  - Recycling raw materials, such as lubricants, papers, but also WEEE.
- ✓ We educate, sensitize and encourage our employees' to participate in the operation of our Environmental Management System, but also more generally, to adopt an environmentally responsible way of life.
- ✓ We have an open dialogue with our employees and stakeholders.
- ✓ We expect our suppliers and our contractors to demonstrate environmental care and put into practice environmental management programs.
- ✓ We contribute to the sensitization- mobilization of our customers on environmental issues, such as recycling of mobile phones, batteries, ink cartridges, the use of ecological materials, such as bio-degradable bags in our shops, as well as services like e-billing.
- ✓ We stay in contact with the local society, we anticipate and correspond to their needs to confront critical environmental issues.
- ✓ We participate in public dialogue and environmental discussions in general.
- ✓ Remaining faithful to our environmental principles, we put into practice, everywhere in Greece, the Environmental Management System, according to ISO 14001:2004 standard, in all the breadth of our operations and services.
- ✓ The reduction of our impact on the environment, requires continuous effort and monitoring of results. Environmental issues constitute an integral part of our philosophy and are integrated in all internal operations of our company.

**Michael Tsamaz**  
Deputy CEO COSMOTE

Within the frame of this Environmental Management System, we analyze all our activities, products and services with reference to their impact on the environment and try to improve our environmental performance, by setting goals, determining indicators and taking actions, which are economically feasible. In parallel, we also achieve engagement of our employees towards a common purpose: for our people to be sensitized and mobilized on protecting the environment and to correspond willingly to invitations by our company and society in general, to take part in respective programs.

# 2. Energy and Climate Change

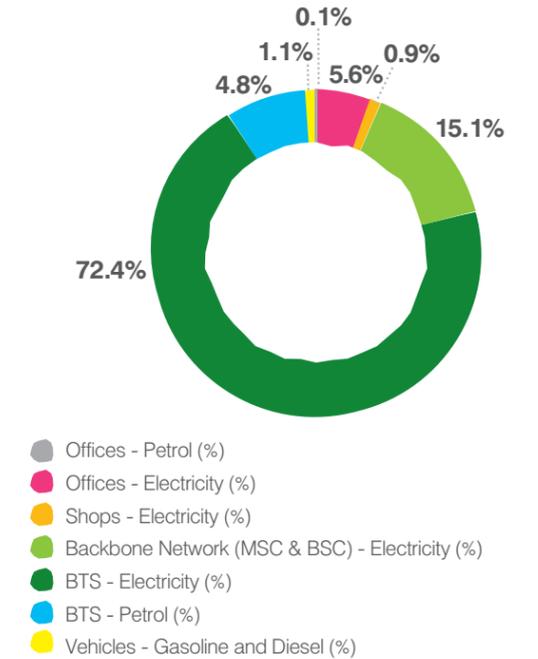
## A. We analyze energy consumption sources

Our company recognizes the importance and risks associated with the issue of Climatic Change. Therefore it strives to improve its energy efficiency and therefore reduce the negative impact it has directly (e.g. petrol use in Base Stations,) and indirectly (e.g. electricity use from the Public Power Corporation) on the atmosphere, due to the corresponding greenhouse gas emissions (such as carbon dioxide).

The direct and indirect carbon dioxide emissions, which are related to our company's energy consumption, are presented below per sector and activity, while corresponding energy consumptions are described analytically in the following sections of this chapter.

Total (direct and indirect) emissions of carbon dioxide reached 117.525 tn in 2008, with the overwhelming majority being attributed to our Network operations (Backbone Network and Base Stations-B/S). Based on this analysis, which was conducted for the first time in 2008, priorities for our company are identified as being: energy reduction programs within our network operations and secondary within our office operations.

Carbon Dioxide Sources



For the first time we monitored carbon dioxide emissions, deriving from all our activities

\* Data refer to COSMOTE Greece.  
 \*\* Conversion factor: Electricity 0.725, Petrol 0.2025, Heating Petrol 0.2683 gr CO2e/MWh  
 Sources: IEA CO2 emissions from Fuel combustion 2008 Edition - GHG Protocol Calculation Tools (2006 IPCC Guidelines for National GHG Inventories / 2007 IPCC Fourth Assessment Report).

## B. We reduce consumption of petrol in our Base Stations and Offices

In order to continuously provide our services in all Greek territory, we install Base Stations (BTS) in the remotest locations, where electricity supply (via the Public Power Corporation network) is difficult, or even impossible. At these locations, it is necessary to use electricity generators, which function 24 hours a day, or at least temporarily (when energy supply from the Public power Corporation is not available).

- In order to decrease the petrol consumption, which corresponds to increased carbon dioxide emissions, our company:
- Reduced the use of 24hour generators (within 2008, 52 generators where de-installed).
  - Applied a program to monitor exhaustions and to maintain properly 101 more generators, operating for 24 hours a day (aiming to ensure their proper operation).
  - Monitors also heating petrol consumption in office buildings (Daxtilidi and Maroussi A') and due to generator operation in offices (Daxtilidi, Maroussi A' and Acharnon), even if this amount is incremental, in comparison to petrol consumption in BTS.

More analytically, in 2008 the petrol consumption in BTS reached 2,260,000 lt, heating petrol consumption (Daxtilidi and Maroussi A') reached 71,843 lt, while petrol consumption for generators in offices (Daxtilidi, Maroussi A' and Acharnon) reached 4,900 lt. These quantities correspond to a total petrol usage reduction of 5.9%, in comparison to 2007.

### Petrol Consumption in Base Stations and Offices



We reduced the total consumption of petrol by 5.9%

### C. We reduce the electricity consumption in our Backbone Network and Base Stations

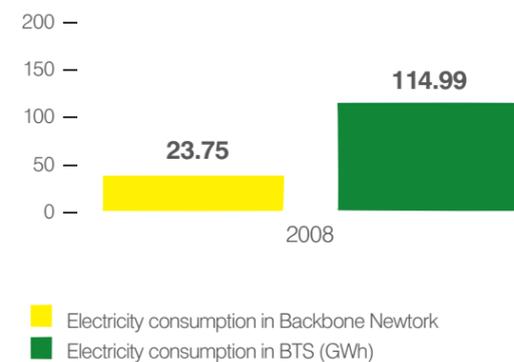
Growth of our network and deployment of a new third Generation (3G) network, require installation of new Base Stations and additions of new equipment in our Backbone Network. Therefore, reduction of energy consumption is an unrealistic goal, for any mobile telephony company.

The company has not monitored directly the total electricity consumption in BTS and Network, a practice it intends to complete in the near future. However, in order to prioritize energy reduction programs, we conducted estimations, in order to focus on areas, where the highest energy consumptions (and corresponding carbon dioxide emissions) originates from.

In order to decrease current electricity consumption in Base Stations, our company:

- Continues the installation of free cooling air-conditioning systems, aiming to reduce energy use (utilizing the difference between external and internal temperature in BTS). In 2008, we installed 60 more free cooling systems, increasing the total number to 1,315.
- Has installed, within the last years, photovoltaic panels in 37 Base Stations in total.
- Initiated a program for the gradual replacement of old telecom equipment with new type equipment, achieving a worth mentioning reduction in energy use. The program will be continued and new Base Stations will be designed, according to new energy facts.

### Electricity Consumption in Backbone Network and BTS



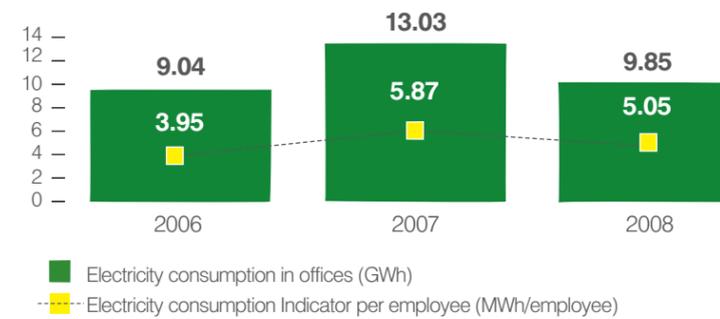
### D. We reduce electricity consumption in Offices

The high pace our company grows with, results an increase in number of employees, corresponding office space and electricity consumption. In order to handle this impact, we have taken proactive measures, such as:

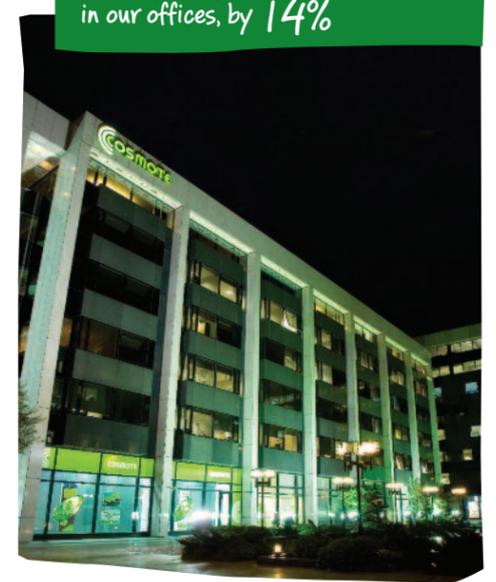
- We sensitize our employees about the consequences of energy consumption on the environment.
- We monitor consumption and take actions, such as decreasing the air-conditioning use and limiting lightening in exterior places (such as garage spaces etc.).

Our efforts led to a significant reduction of energy consumption, which reached 5.05 KWh per employee, from 5.87 in 2007, which corresponds to a 14% electricity reduction. It is worth mentioning, that in 2008 a respective energy reduction program was initiated in COSMOTE Romania's offices.

### Electricity Consumption in Offices



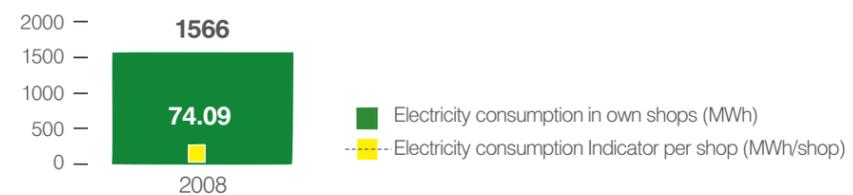
We reduced electricity consumption per employee in our offices, by 14%



### E. We reduce electricity consumption in Shops

Our company's high rate of growth, also results a proportionate increase in number of retail shops. For this reason, we closely monitor energy consumption in our shops.

### Electricity Consumption in Shops



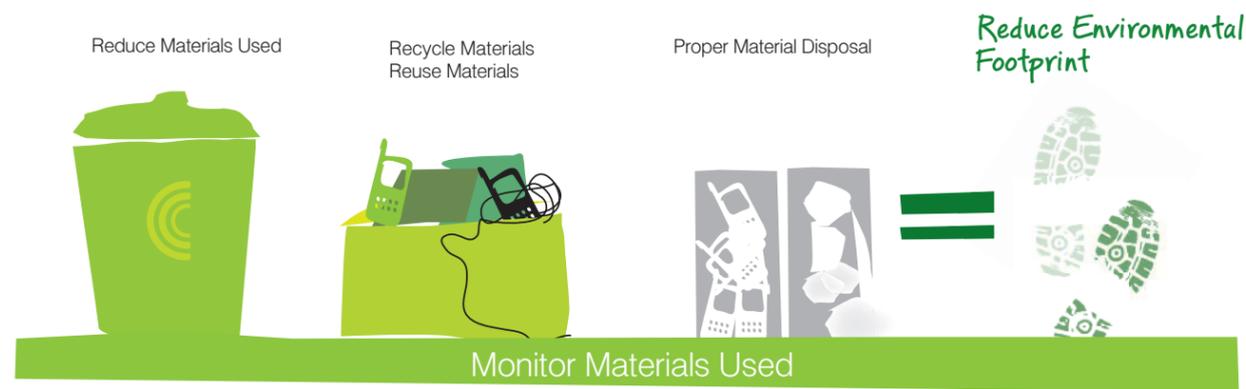
### 3. Raw Material and Solid Waste

#### A. We analyze the use of raw material

Our company recognizes that raw materials are not inexhaustible and that a more efficient use of resources, is a priority for the whole planet. For this reason, we follow the principle **Reduce – Reuse – Recycle**, in order to achieve the more efficient use of limited natural resources, while we also aim to reduce the production of solid waste, that inevitably emanate from any corporate activity.

Consequently, depending on the type of materials (general or special-hazardous), our company:

- Monitors materials used.
- Reduces materials used.
- Reuses materials used.
- Recycles materials used.
- Properly disposes materials produced.



#### B. We use recycled materials

COSMOTE, continued in 2008 to acquire 1,600,000 environmentally friendlier, bio-degradable bags, which are used in all COSMOTE Greece shops. Consequently, all bags consumed by our shops are now bio-degradable.

- The goal to expand in 2008 the use of bio-degradable bags in GERMANOS shops, was not achieved. However, the respective production is already done. The main reason, for not achieving the objective was the significant quantity of old bags, already in stock. When the old stock is used up, the use of bio-degradable bags will be initiated.
- This particular practice has also been applied in GLOBUL Bulgaria, where, till mid 2008, over 364,000 bio-degradable bags have been used.

Moreover, our company only uses recycled paper in all materials related to Corporate Responsibility activities. The same practice is also applied in GLOBUL Bulgaria, since the end of 2008 for photocopier paper used in offices and shops. As a result, roughly 40% of paper bought was recycled paper.



#### C. We reduce consumption of Packaging Material



##### Reduction of packing materials

Our company implemented a product packaging reduction program, for products positioned in its shops. Even though the increase of our sales makes the total material reduction difficult, we succeeded to achieve a more effective raw material use, by decreasing the weight of our packaging (such as for our i-mode product).

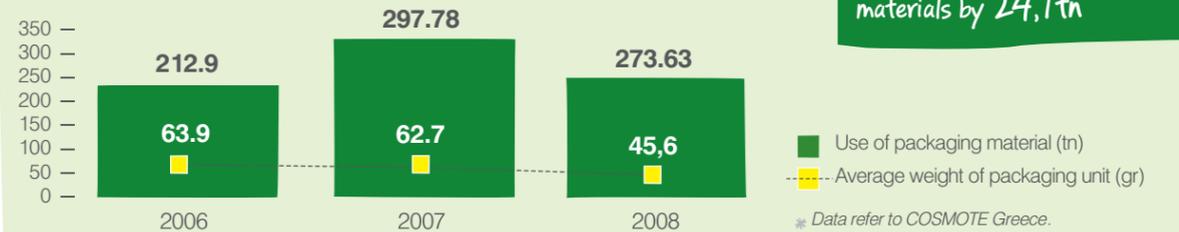
In 2008, the average weight of our packaging, decreased to 45.6 gr per unit (from 62.7gr in 2007), a reduction which corresponds to 27%, while the net reduction of packing materials used was 24,1tn.

##### Consumptions of our product packaging materials

	2006	2007	2008
Aluminium (tn)	6.88	12.46	8.81
Wood (tn)	48.25	52.93	35.27
Plastic (tn)	47.39	85.94	100.19
Paper - cardboard (tn)	109.57	146.46	129.36
Packaging (pieces)	3,317.879	4,748.894	6,001,672
Bio - degradable bags (number)	0	1,000,000	1,600,000

\* Data refer to COSMOTE Greece

##### Packaging Materials



We reduced the average packaging weight of our products, by 27% and the net use of materials by 24,1tn



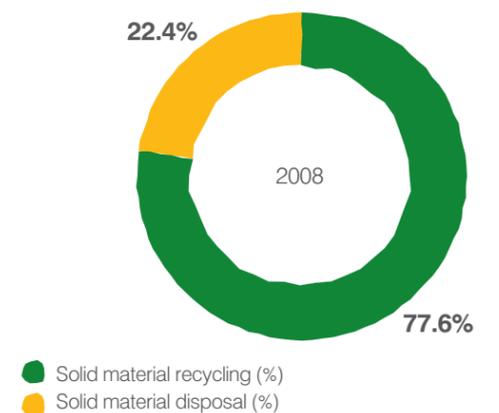
### General Material Management

#### D. We recycle Warehouse Materials

Within 2008, we initiated an alternative program to manage materials of our warehouse in Metamorphosis. In total, 48.42 tn packaging materials were delivered for recycling through our warehouse (42.08 tn cardboards, 5.86 tn plastic and 0.48 tn iron), while 13.94 tn of non-recyclable materials were directed for disposal, to the Ano Liosion waste area.

We recycled 77,6% of solid waste from our warehouse

##### Recycling and Disposal of Solid Waste

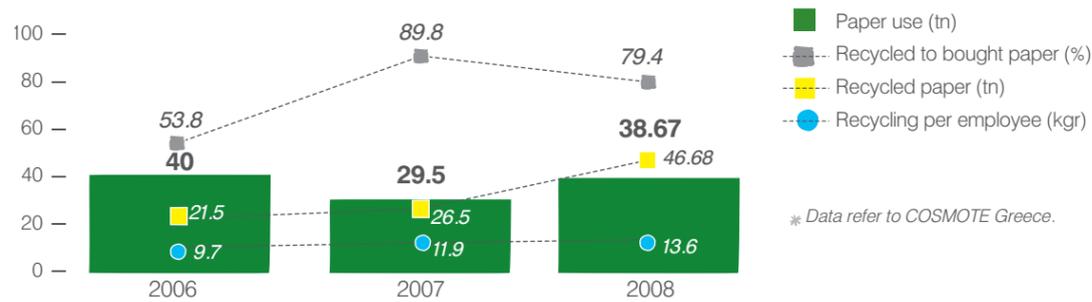


## E. We reduce usage and recycle Paper

The reduction of paper used in our offices, is a practice COSMOTE has implemented for many years now, and our employees are accustomed to. This effort, is based on the following practices:

- Use of messages to sensitize our employees.
- Application of electronic paper management tools.
- Predetermined two-page-in-one printing and possibility of two-side photocopying, for all employees in Greece.
- Option for customers to receive electronically account statements. This practice is also applied in GLOBUL Bulgaria.

### Use and Recycling of Paper



At the same time, by systematizing the recycling program, we focus on properly managing paper used. In 2008, 46.7tn of paper were recycled, however, a significant quantity (roughly 16tn) concerned accumulated stock from previous years (mainly customers' files). Consequently, the recycled quantity, apart from previous years' stock, was 30.7tn (or 13.6 kgr per employee), increased by 13.8%, in comparison to 2007.

We recycled 46,7 tn of paper (almost 80% of the quantity we bought) and increased paper recycling per employee by 13,8%

This particular paper recycling practice is also applied in GERMANOS Greece, and partially in GLOBUL Bulgaria and COSMOTE Romania.



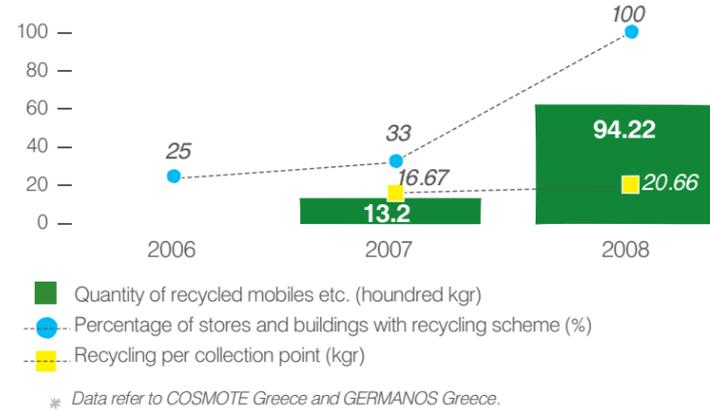
## Special Waste Management

### F. We recycle Mobile Phones, Accessories and Batteries

In 2008, we continued the recycling program we have successfully implemented since 2005, by further making the 422 GERMANOS shops all over Greece collection points for mobiles, accessories, batteries and inkpots (besides our buildings and our 24 exclusive shops, which were already collection points).

In total, 9.422 kgr of phone devices and mobile telephony accessories were gathered in our buildings and shops, all over Greece. As a result, our 2008 target (which was to collect 10 kgr per collection point), was over-achieved, reaching 20.66 kgr per collection point. It is worth mentioning, that in 2008 a corresponding recycling program was also initiated in GLOBUL Bulgaria, in more than 240 sales points.

### Recycling of Mobiles, Batteries and Accessories



Olympic Champion and COSMOTE Social Responsibility Ambassador, Pyrrhos Dimas, recycles his mobile phone

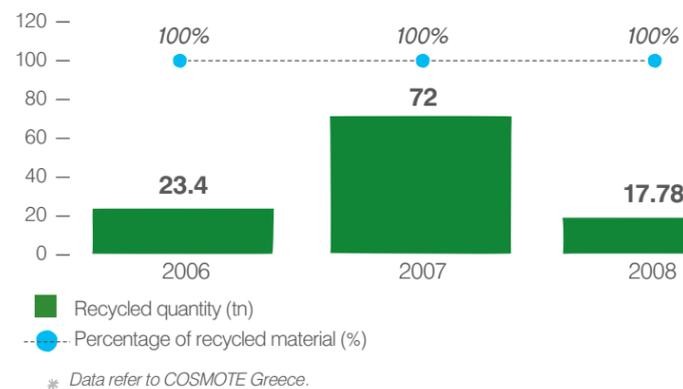
We deployed our mobile recycling scheme to 100% of our shops. We recycled 9.4 tn of mobiles-accessories and increased collection per point by 24%

Apart from phone devices, batteries and accessories, our company also enables recycling of domestic batteries and ink cartridges in its shops, for the public. In 2008, 64,072 kgr of domestic batteries were collected from 456 collection points (i.e. 140 kgr per point), as well as 2,064 ink cartridges (or 4.53 items per collection point).

### G. We recycle Electrical and Electronic Waste - WEEE

COSMOTE was the first mobile telephony company in Greece, which responded to the requirements of the relative legislation (117/2004) and signed a contracted with the Appliances Recycling company, the only licensed company in Greece, for recycling Electrical and Electronic Waste Equipment. Through this environmental program, we forward 100% of telecommunications equipment withdrawn for recycling, which in 2008 reached the quantity of 15.24 tn. We also recycle 100% of IT equipment (PC, monitor, fax), which corresponded in 2008 to 2.54 tn.

### Electrical and Electronic Waste Recycling

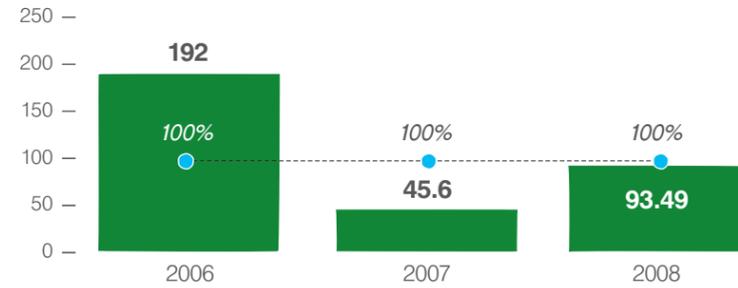


We recycled 17.8 tn electrical and electronic waste, 100% of the quantity we withdrew

## H. We recycle Base Station Batteries

In order to continuously provide our services to customers, we have installed lead batteries in our Base Stations, which are activated when electricity provisioning problems occur. When the life cycle of batteries is completed, these are collected by specialized companies and transported to licensed establishments, in order to be recycled (since lead batteries are characterized as hazardous). Our objective for 2008 was the alternative recycling of 100% of withdrawn batteries. This objective was achieved, as 4.191 items (or 93.49 tn) of lead- acid batteries were forwarded for recycling.

### Recycling of Lead Batteries



■ Recycled quantity (tn)  
● Percentage of recycled material (%)

\* Data refer to COSMOTE Greece.

We recycled 93.5 tn of batteries, 100% of the quantity we withdrew



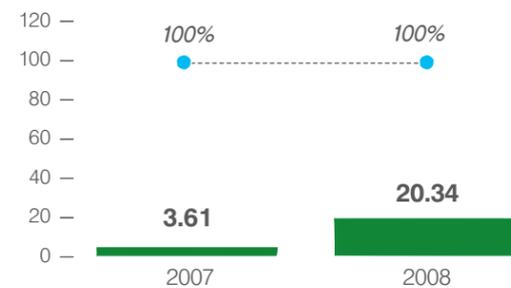
## I. We recycle Oil-Lubricants

It is ecologically important to avoid rejection of lubricants to the environment, which are used in generators located in Base Stations, as these are considered dangerous materials. For this reason:

- We invested in installing special collection buckets in all BTS, with 24hour operating generators (or generators used for backup operation), for outcast oil-lubricants and maintenance waste.
- Until the end of 2008, 640 special buckets were placed in total, while 20,342 lt of lubricants were collected, for alternative recycling.
- At the same time, we cooperate with a licensed company, which collects and forwards for recycling the whole quantity of lubricants rejected, during generator maintenance.
- Apart from the special collection buckets for lubricants and consumables, in 2008 we placed 980 buckets, in which other waste, originating from BTS maintenance, are collected.

The target for 2008, was the alternative management of 100% of outcast Lubricants and Oils, which are a result of BTS generators maintenance. Consequently, in 2008 over 21,700 lt of lubricants were bought, while 20,342 lt were collected and delivered, to the respective Alternative Management Collection System. The 6.3% difference, is due to the fact that acquisition and replacement of oil and lubricants do not completely coincide with the calendar year, but also due to oil and lubricants being consumed, during operation.

### Oil-Lubricants Recycling



■ Quantity recycled (thousand lt)  
● Percentage of recycled oil (%)

\* Data refer to COSMOTE Greece.

We recycled 20,342 lt of oil-lubricants, 100% of the quantity we withdrew

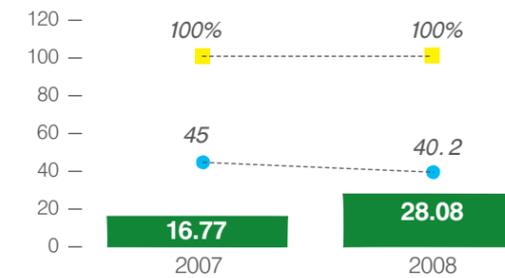
## J. We re-use Ink Cartridges

Since the very first year of our operation, COSMOTE has adopted a policy to handle ink cartridges for printers and photocopy machines, since in some cases, these contain hazardous substances.

The target for 2008 was to re-use 30% of bought ink cartridges. The target was overachieved, as re-use reached 40.2%. More specifically, 2,808 new ink cartridges were bought, 1,129 were delivered and refilled (after their reconstruction, in case they had a repairable dysfunction). All items, which could not be re-used, were sent for alternative recycling.

It is worth mentioning, that the practice of re-using ink cartridges, is also implemented in GLOBUL Bulgaria.

### Re-use and Disposal of Ink Cartridges



■ Used (hundreds)  
● Reused to bought (%)  
■ Disposal of non-recyclable (%)

\* Data refer to COSMOTE Greece.

We re-used 40.2% of ink cartridges withdrawn



## 4. Ozone Layer

### A. We reduce our impact on the Ozone Layer

Our company has stopped using equipment, which contain chlorine-fluorine-carbons (CFCs), which are extremely harmful for the ozone layer. Progressively, our company has replaced these substances with refrigerating and extinguishing substances, which are environmentally friendlier (as they correspond to lower Ozone Depleting Potential - ODP), such as the cooling substances R22, 407, 410C, 134A and the extinguishing substance FM200.



## 5. Water

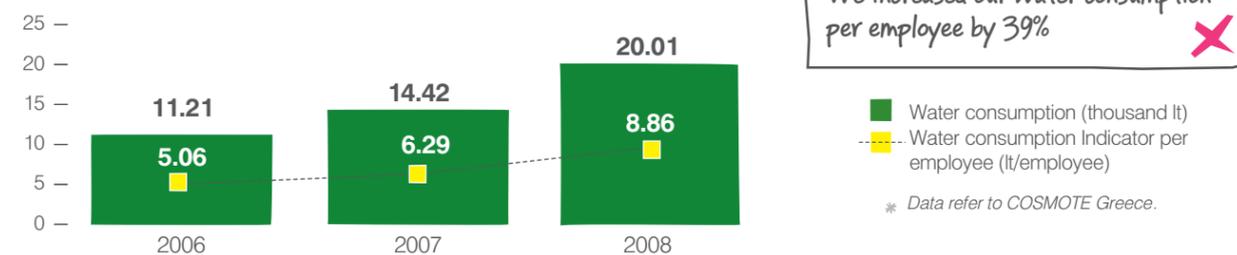
### A. We monitor our water consumption

Since water is not connected to our operations, we consume water (acquired solely from public water companies), exclusively for our employees' hygiene, plant watering and office/shops cleaning. Nevertheless, the importance of water for life on our planet, has led us to the decision to monitor its consumption and sensitize our employees on its responsible use.

Consumption in 2008 was 20.006 m<sup>3</sup>, which unfortunately corresponds to an important increase of 39%, in comparison to 2007 (when it was 14.423 m<sup>3</sup>), due to a water leakage and further utilization for watering.

It is worth mentioning, that within 2008 a program for the reduction of water consumption was also initiated in COSMOTE Romania.

#### Water Consumption



## 6. Transportation

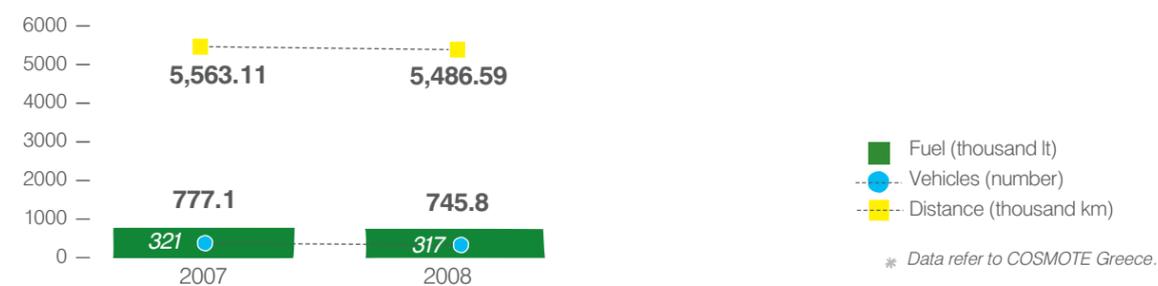
### A. We reduce our transportation impact

Our company's products are distributed to all our sales points, according to specific processes, which include:

- The employment of trained drivers and application of a control system for drivers, loads and routes.
- The systematic control of our distribution fleet, at the Technical Vehicles Control Centers (T.V.C.C) and the supply of exhaust-gas cards.

The number of vehicles for COSMOTE Greece in 2008 was, on average, 317 (104 of these are executive cars and 4 of these use diesel fuel), while in 2008 these vehicles consumed in total 745,779 lt of fuel (1,328 lt of those were diesel), used to cover a distance of roughly 5.5 million km.

#### Fuel Consumption



## 7. Biodiversity

### A. We monitor our impact

The influence of our activities on biodiversity is minimal and does not constitute a priority for action, in comparison to other issues addressed in this chapter. Nevertheless, our company:

- Commits to restore potential negative repercussion, which our offices and Base Stations might have on the ecosystems.
- Through Environmental Impact Studies for Base Stations, our company identifies the potential impact of Base Station construction on the natural and building environment and strives to integrate Base Stations, with the least possible repercussions.
- Has already completed the development of 2,200 Environmental Impact Studies, which have been registered for approval, at the respective Regions.
- Protected areas near Base Stations, such as NATURA, SPA (Special Maintenance of Bird Species), RAMSAR, CORINE (protection of biotopes), IBA (important areas for birds) are in all cases referred to in respective Environmental Impact Studies and are evaluated, within the context of relative processes.

It should be mentioned, that according to Law 3431/2006 for electronic communications, all mobile telephony Base Stations-Antennas in Greece, have to be retroactively accompanied by Environmental Impact Studies, which have to be approved by the 13 Regions of the country. Overall, the Base Station licensing process in Greece bears significant difficulties: up to 18 different public agencies are involved in a licensing process (1-2 in the E.U.), while the average time required for this process, is over 30 months (corresponding time in E.U. countries is 7.2 months).



## 8. Electro Magnetic Frequency

### A. We follow the Precautionary Principle

The important benefits mobile telephony offers to citizens in their everyday life, is the main reason, which has led to a dynamic growth of mobile telephony. At the same time however, we recognize public concerns, about potential consequences of electromagnetic radiation on health issues. Even though (a) relative research, conducted by the World Health Organization did not indicate any such correlation and (b) independent measurements estimate the percentage of electromagnetic emissions attributed to Base Stations, to be up to 30% of the total electromagnetic fields in populated areas, our company follows the precautionary principle, applying a number of practices, such as:

- The radiation levels, in all our Base Stations, are significantly lower, than the strictly legislated limit in Greece (60% of ICNIRP limits), in all points with free public access.
- All our Base Stations have the required radiation studies, which have been registered at the Greek Committee of Atomic Energy (which is the Independent Organization, responsible to protect the public from exposure to electromagnetic radiation).

### B. We monitor the levels of radiation

Our continuous EMF measurement program, called "Pedion24", has been developed by the Laboratory of Mobile Radio Communications of the National Technical University of Athens and the Radio Communications Laboratory of the Aristotelian University in Thessalonica, with the support of COSMOTE. The program aims to continuously and openly brief the public, about the levels of electromagnetic fields, around mobile telephony Base Stations, including all other EMF sources, such as radio transmitters, televisions, radars and other telecommunication applications.

COSMOTE's participation in the program refers to supplying all essential equipment: leading edge technology measurement stations (with suitable detectors of electromagnetic fields), as well as certified appliances, compliant with the European specifications and latest scientific models. In order to continuously record electromagnetic field radiation levels in even more regions of the country and achieve respective briefing of all citizens, the Aegean University was recently joined the program.

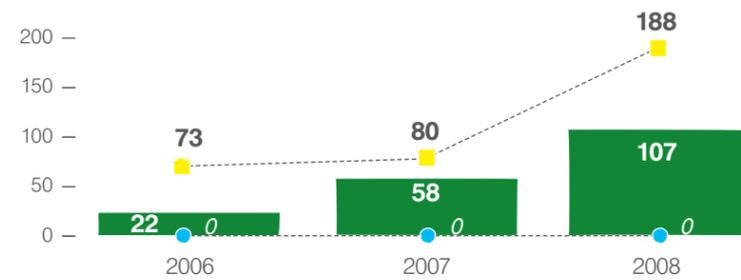


After the first pilot phase, at the end of 2005, the program was fully deployed during 2006, offering continuous flow of information, regarding the levels of electromagnetic fields, throughout the day. The system consists of:

- The electromagnetic radiation measurement stations, positioned in various locations.
- The management centre, located in the Mobile Radio Communications Laboratories of the National Technical University of Athens, the Aristotelian University in Thessalonica and in the Computer Systems and Communications Laboratory of the Aegean University.
- The stations cover the prefectures of Attica, EtoIoakarnanea, Arta, Achaea, Dodekanisoy, Evia, Evrytanea, Iliia, Iraklion, Thessalonica, Corfu, Kilkis, Kozani, Korinthia, Cyclades, Larissa, Lesvos, Lefkada, Magnesia, Messinia, Pelli, Pieria, Preveza Rethimno, Rodopi, Samos, Serres, Trikala, Fthiotidos, Florinis, Chalkidiki, Chania and Chios.

- The stations are located in sensitive areas all over the country (e.g. near schools and in densely populated regions).
- The measurement stations measure, at a 24/7 schedule, the total electromagnetic field, caused by various sources, such as broadcasting, television and mobile telephony.
- Every 24 hours, the measurement stations communicate with the management centre and forward measured data, to a central server, where they are stored.
- Afterwards, the measurements are automatically made available in the program's website ([www.pedion24.gr](http://www.pedion24.gr)), where anyone interested can be informed, about the results in every measurement station.

### "Pedion 24" Program



■ Measurement stations (number)  
 ● Over the limit Indicator (%)  
 ■ Other measurements per year (number)

\* Data refer to COSMOTE Greece.

We increased by 100% the measurements conducted through our «Pedion 24» program



Every year, we aim to increase the number of measurement stations, in order to brief our fellow citizens, in even more regions of the country. To the 58 stations already installed in 2007, 49 more stations were added in 2008, reaching our goal to install 50 new stations, during 2008. These stations, conducted over 4 million measurements during 2008, without indicating cases of EMF measurements exceeding the legislative limits.

In 2008, 160 further measurements were conducted by specialized scientific personnel of COSMOTE, while in addition 28 more measurements were conducted by independent institutions (Universities, E.E.A.E). Again, public exposure safety limits were not exceeded (in points of free public access), in any of these measurements.

It is worth mentioning, that the website visits for the "Pedion24" program (for the continuous measurement of electromagnetic radiation), are on average 74 visits per day.



### C. We inform our fellow citizens

Our objective is for citizens to have access to credible and accurate information, therefore we continuously try to identify ways for citizens to be exposed to sources of information, regarding mobile telephony and antenna use. For this reason:

- We published a leaflet called "Pedion 24 - Continuous Measurements of Electromagnetic Radiation Program", where the way the respective program functions is described. The leaflet was placed in our commercial network, throughout Greece.
- We continued the promotion of existing leaflets, which were enriched with updated content: in 2007, we forwarded more than 25,000 leaflets titled "Questions and Answers on mobile telephony", through our shops.
- The average number of visits in our "Pedion24" program website (where continuous measurement of electromagnetic radiation levels are displayed), were 74.

### D. We conduct an open dialogue with local communities

Our effort to responsibly inform citizens, is not restricted to issuing leaflets. During 2008, we intensified our contacts with responsible institutions and representatives of local communities all over Greece, responding to requests for dialogue, briefings and presentation of information.

At the same time, we strengthened the respective department within our company with more executives, in order to be able respond to the increasing interest for meetings and information, in all regions of our country.

### E. We systematically inform our employees

Our employees, more than anyone else, owe to understand how mobile telephony functions. For this reason, we have designed a specific program aiming to brief them, which in 2008 included informative meetings. Through this program, we provided responsible and scientifically documented information, about mobile telephony operation.

It should be mentioned, that corresponding practices are followed in all subsidiary companies of COSMOTE: the radiation levels of Base Stations are below the respective legislative limits in all countries (e.g. in the case of AMC Albania, the limit is the set at the E.U. limit), while briefing the public and employees, is performed by corresponding practices (e.g. in COSMOTE Romania via an informative form, also located in the website of the Communications and Technology Ministry of Romania; in GLOBUL Bulgaria via a leaflet located in the company's website, including a short question-answer section [www.globul.bg/bg/globul\\_for\\_society.html?posm=8](http://www.globul.bg/bg/globul_for_society.html?posm=8)).



GERMANOS employees participating in "Pedion 24" program



Measurement of electromagnetic radiation displayed to students



## 9. Targets 2008 and 2009

We said (in 2008)	We did (in 2008)	Progress	We will (in 2009)	Target Date
Expand the energy measurement system, to building heating petrol and corporate vehicle fuel.	See Section III-2,A,B	100%	–	2009
To expand the energy measurement system to shops and BTS.	See Section III-2,A,B	75%	<ul style="list-style-type: none"> <li>To expand the environmental data measurement system (e.g. to refrigerants and fire suppressants).</li> </ul>	2009
Ensure data accuracy and integrity for energy consumption.	See Section III-2	75%	<ul style="list-style-type: none"> <li>To improve the energy consumption measurement system (e.g. to Backbone Network and BTS).</li> </ul>	2009
Monitor energy consumption for petrol and electricity in CO <sub>2</sub> emissions, per employee, per year.	See Section III-2A	75%	<ul style="list-style-type: none"> <li>To reduce petrol consumption, by 5%.</li> </ul>	2009
Gradually reduce CO <sub>2</sub> emissions.	See Section III-2A	50%	<ul style="list-style-type: none"> <li>To reduce electricity consumption in office buildings, by 5%.</li> </ul>	2009
To expand the use of bio-degradable bags in GERMANOS shops in Greece.	See Section III-3B	0%	<ul style="list-style-type: none"> <li>To expand the use of bio-degradable bags in GERMANOS shops, in Greece.</li> </ul>	2009
Reduce relative consumption of packaging material (paper, aluminum, plastic and wood).	See Section III-3C	100%	<ul style="list-style-type: none"> <li>To recycle 100% of packaging waste, in our warehouse.</li> </ul>	2009
To recycle 100% of WEEE materials withdrawn.	See Section III-3G	100%	<ul style="list-style-type: none"> <li>To recycle 100% of WEEE materials withdrawn.</li> </ul>	2009

We said (in 2008)	We did (in 2008)	Progress	We will (in 2009)	Target Date
To collect 10 kgr phone devices and accessories per point of sales (including GERMANOS).	See Section III-3F	100%	<ul style="list-style-type: none"> <li>To collect 15 kgr phone devices and accessories and 145 kgr of domestic batteries, per collection point.</li> <li>To expand mobile recycling in 300 of our shops, in COSMOTE Romania.</li> </ul>	2009
To recycle 100% of lead batteries withdrawn.	See Section III-3H	100%	<ul style="list-style-type: none"> <li>To recycle 100% of lead batteries withdrawn.</li> </ul>	2009
To re-use 30% of ink cartridges bought and manage alternatively 100% of the non-recyclable.	See Section III-3J	100%	<ul style="list-style-type: none"> <li>To re-use 30% of ink cartridges bought and manage alternatively 100% of non-recyclable ones.</li> </ul>	2009
To recycle 100% of oil-lubricants withdrawn.	See Section III-3I	100%	<ul style="list-style-type: none"> <li>To recycle 100% of oil-lubricants withdrawn.</li> </ul>	2009
Reduce 1% of water consumption per employee.	See Section III-5A	0%	–	2009
To increase by 10% the quantity of paper recycled.	See Section III-3E	100%	<ul style="list-style-type: none"> <li>To increase by 10% the quantity of paper recycled per employee.</li> </ul>	2009
Monitor and reduce the vehicle fuel consumption by 1%.	See Section III-6A	100%	–	2009
Install over 50 EMF monitoring stations.	See Section III-8B	100%	<ul style="list-style-type: none"> <li>To reach 200 points of measurement, till 2010 (Pedion 24).</li> </ul>	2010

# IV

our world *our society*



How can we holistically support society,  
beyond financial aid?

briefly...

2.5 million emergency  
calls

324 blood donators

494.6 million Euros  
for investments

## Our philosophy

We believe it is our responsibility to apply a business model, which combines our company's continuous growth, with the prosperity of those who are influenced, by our operations. For this reason, we seek to cover needs and improve life quality of citizens, in local societies and countries, in which we do our business.

## Our objective

To combine our business success, with prosperity and quality of life, for citizens in local communities and countries we conduct our business in.

## Our achievements in 2008:

- We contributed to handle over 14,733 medical actions, in isolated rural areas.
- We contributed to examine 3,142 children, through our ergonomic program.
- We developed 3 products and services for Disabled People.
- We increased the number of employee blood donators by 13%, reaching a total of 324 donators.
- We donated 91 boxes with toys, school supplies and clothes.
- We informed over 600 children, on the way a mobile telephony corporation operates.

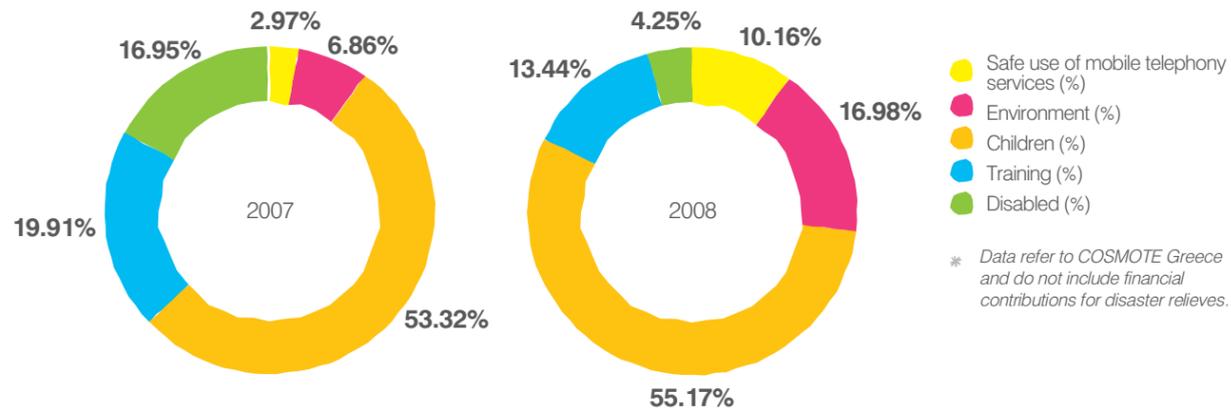
# 1. Social Contribution

For our company, Corporate Responsibility is broader than financial donations, however we recognize the need to financially support weaker social teams and organizations, via programs and activities we implement.

Therefore, we focus on the following areas, of social initiatives and actions:

- Equal opportunities for Disabled People.
- Equal opportunities for education and information technologies.
- Alleviation of society, from consequences of natural disasters.
- Taking care and protecting children.
- Protecting minor children, during Internet usage (see section V-3C)

## Allocation of Financial Contribution for Corporate Responsibility Activities



## A. We support equal opportunities for Disabled People

At COSMOTE we believe that Disabled People should be offered the same opportunities and living conditions, as any other citizen. For this reason:

- For the third consecutive year, we supported the important web site [www.DISABLED.gr](http://www.DISABLED.gr), with visitors doubling in 2008, reaching a total of 150,000 per month. This web site provides useful information, to help disabled people in their everyday life.
- We supported the magazine “DISABILITY NOW”, a magazine about disability, with the highest circulation and broadest topics, of those using the Greek language.
- We sponsored “Autonomia EXPO 2008”, the first exhibition concerning Disability, Rehabilitation, Special Treatment and Independent Living, which attracted over 80 exhibitors and roughly 4,500 visitors. At a dedicated kiosk, especially prepared for this occasion, we presented our services and products for Disabled People and informed visitors, about the progress of relevant programs we support.



The website [www.disabled.gr](http://www.disabled.gr)

## B. We support equal opportunities in Education

The education sector, constitutes an important priority, to support local societies.

### Scholarship Program for Rural Greek Regions

For the seventh consecutive year, we offered COSMOTE Scholarships. These Scholarships aim to support first year University students, which live in rural regions and have low income or special family needs, in order to complete their studies.

Since 2002, when the program started, COSMOTE Scholarships have travelled to 49 prefectures, covering almost the entire Greek region. Through this program, we have granted 71 Scholarships and 152 Honorary Distinctions in total (the value of which exceeds the amount of 1 million €), to first year students, in rural regions.

More specifically:

- We offered 10 Scholarships of 12.000 € each, to first year students from prefectures of Dodekanisa, Karditsa, Cyclades, Lasithi, Lefkada, Pieria, Rodopi, Trikala, Fthiotida and Florina.
- We granted 26 Honorary Distinctions of 1.000 € each, to candidates chosen through an assessment process, addressing curriculum and extra-curriculum achievements.
- The Scholarship ceremony, for the first time this year, took place in a rural area, more specifically in the Rodopis Prefecture.

It is worth mentioning, that in 2008, GLOBUL Bulgaria offered 10 new scholarships to Sofia Technical University students, provided them the opportunity of practice inside the company, but also hired 2 students of those who graduated.

The company also supported the Telecommunications Department, at the Sofia Technical University, by renovating the Technology laboratories.



The Globul scholarship program for students in Bulgaria



COSMOTE students' scholarship ceremony in Komotini



Olympic Golden Medalist, Pyrrros Dimas congratulating scholarship students

### C. We contribute to the alleviation due to natural disasters



Our mobilization to alleviate regions affected by the devastating summer 2007 fires, was immediate, but continued further within 2008, through a series of programs:

#### For the Environment

- In Assiro of the Thessalonica Prefecture, we supported reforestation of 100 acres.
- In Lakonia Prefecture, we supported the reforestation program of Therapnon Municipality in Pamona, by acquiring trees, used to bring back life to the natural environment.
- In Kalamata Municipality, we ensured the acquisition of a 4X4 car with a fire pump, to meet the need of preventive forest protection in the region and ensure immediate intervention, in case of fire.
- In Gortynas, Lasionos Andritsainas, Falaisias and Figaleias Municipalities we ensured the acquisition of landscaping machines for each municipality, in order to open up streets after landslips, realize rural and municipal road constructions, repair water supply damages, as well as to complete road works for flood-prevention, antifouling and reforestation. Moreover, at the Figaleias Municipality, we contributed to restore the High School and Lyceum roofs and build a gym roof. In order to familiarize children with technology aspects, we also ensured acquisition of electronic equipment (PC, printers, projectors, photocopiers) for the Municipality's Public school, High school and Lyceum.
- We ensured the acquisition of a 4X4 car with a fire pump, for the Iliia Hunting Association, to meet the need for preventive forest protection, patrols and immediate intervention, in case of fire.
- We support the role of NGOs in forest protection and, especially, in handling natural disasters (floods, earthquakes, fires etc.). Therefore, we supported the **Greek Rescue Team (GRT)**, by covering all technological needs of its Mobile Telecommunications and Enterprises Coordination Centre, which provides telecommunication support to rescue initiatives (in case of natural disasters), facilitates the collaboration between involved people and can also be used in GRT's humanitarian missions abroad.

#### For Arts

- In Andritsainas Municipality we support, in collaboration with the Aristotelian University of Thessalonica (AU.TH), the documentation and digitalization of selected books of the Nikolopoulos collection, within the Andritsaina's library, as well as the publication of the Library's Historical Files. The program will be completed in 2009.
- In Messinias Municipality we supported, in collaboration with UNESCO Arcadia, Messinia Prefecture and Eiras Municipality, an artistic festival in Epicure Apollo's temple.
- With our support, the Neos Kosmos theatrical team travelled, during 2008, to regions affected by the 2007 fires, performing and providing happiness to children, which eye-witnessed the natural destruction.



#### For Health

- In Megalopolis Municipality, we contributed to the purchase of a water chlorination system, in order to ensure potable water quality, for 9,000 residents in 31 municipal sections.
- In Ilias Prefecture we support free of charge, preventive examinations and health briefings, conducted by the voluntary institution «Open Embrace» of the «Social Paediatrics Friends», within the frame of the preventive medicine expedition «We support life». At the same time, with our support, the school, the surgery and the playground of Kaykania village in Iliia's Prefecture, will be constructed by «Open Embrace». The program will be completed in 2009.

### D. We support programs for children

For COSMOTE, caring for children, constitutes an important area of activities.

#### Ergometric Program «Join us in Sports»

We initiated, with the scientific support of the Ergophysiology - Ergometrics Laboratory of T.E.F.A.A. Sports University and the EY ZHN organization, for the 3rd consecutive year, the pioneering Ergometric program «Join us in Sports», which measures and evaluates the athletic abilities of children, aged 9-16. Supporter of this effort, from its start, is the Olympic weight lifting champion and ambassador of COSMOTE's Corporate Responsibility program, Pyrros Dimas. Through his precious presence, children and young people are encouraged to participate in the program, in order to begin or strengthen their relationship with sports.

Within a mobile unit, fully equipped with leading edge ergometric devices and staffed with qualified scientific personnel from T.E.F.A.A. Athens (ergophysiology and special scientists), reliable scientific ergometric evaluations were conducted.

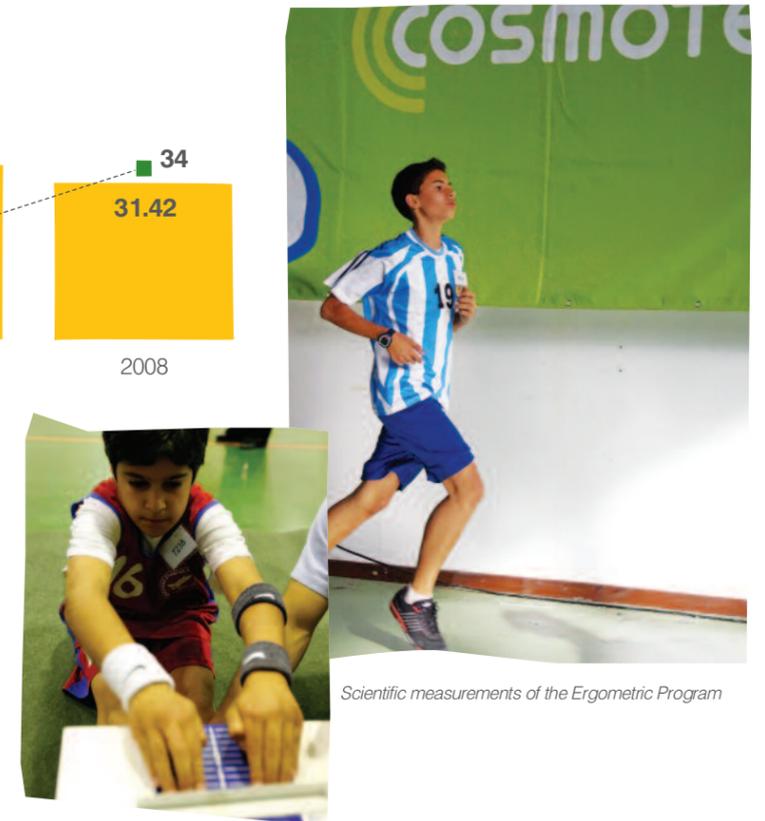
The benefits, for young people were various:

- Their physical condition was evaluated.
- Their nutritious habits were identified.
- Sports were identified, at which they could further excel.

For the first time in Greece, physical condition data for young people aged 9-16 years, were collected, by using high technology devices and scientific methods. In 2007, the program resulted the first published data, which were presented in two international scientific congresses, while in 2008 the Ergometric Program was presented at the 9th International Congress of Sports Medicine in Greece and the 7th Greek-Cypriot Congress.

During the first two years (2006 and 2007), the program was materialized in 20 Attica municipalities in total, offering 4,834 children and young people the option to measure their athletic skills. For 2008, the program visited 14 more Attica municipalities, with 3,142 children and young people participating. The Ergometric program «Join us in Sports» will continue in 2009, visiting 10 Municipalities of Sterea Hellas and Thessalia.

#### Ergometric Examinations



Scientific measurements of the Ergometric Program

Some of the scientific results of the program in Attica, within 2008, are briefly mentioned below:

- Most popular sports for boys are football and basketball, as roughly 60% of participating boys prefers them, while 10% like swimming.
- Girls are mainly occupied with volleyball (~20%), swimming (~12%), basketball (~12%), athletics (~11%), dancing (~10%) and rhythmical/organic gymnastics (~13%).
- A significant percentage of children (30%), are occupied with sports, which require a different level of physical condition, than the one they currently have.
- An important percentage of children (20%), eat lunch outside their home, 2-3 times per week.
- An important percentage of children do not eat breakfast (~21%) and consume sweets and refreshments every day (~30%).

It is worth mentioning that GLOBUL Bulgaria, aiming to create athletic conscience and promote physical activity, organized for the third consecutive year, the National School Olympic Games "GLOBUL START", with the brand "Champions Begin from School". The program is supported by the Ministry of Education and Sciences, the Governmental Youth and Sports Institution and other institutions. Hundreds of Bulgarian students participated in these games, in 4 sports.



Students awarded at the "Global Start" Games



Students run at the "Global Start" Games



### Social initiatives for children

For the eighth consecutive year, we offered to a child care institution, the amount which corresponds to acquiring Christmas business presents. In 2008, we have chosen the Centre for Children with Special Needs from Lesvos, while our Christmas cards were acquired from the Institution "Theotokos".

### "Love Institution" - New Year's Day SMS

For eight consecutive years, through our "LOVE INSTITUTION" program, we offer an important amount of our income from New Year's Day SMS, to support children institutions. More specifically, six institutions were supported this year:

- 213 children received hospitality at the hostel of the Parents Association of Children with Neoplastic Illness, "Floga". Moreover, 38 children were transported by a "Floga" car, to receive their treatment.
- 37 young people were educated on independent living, at the training center of the Spastics Protection Company.
- Thousands of residents in isolated-border regions, benefited from the Preventive Medicine expeditions of the voluntary institution «Open Embrace» of Social Pediatric Friends, by receiving a series of preventive medical examinations, conducted by volunteer doctors.

- We also supported ELEPAP, the children's care centre "Saint Dimitrios" in Thessalonica and the Special Professional Education and Re-establishment Centre in Prebeza.



New Year's Day SMS "Love Institution"

### We support Preventive Medicine in Rural Regions

We recognize the importance to protect people's health, especially children's health, which live in isolated rural regions. Therefore, we supported, for the ninth consecutive year, the Preventive Medicine's expedition «Open Embrace» of the Social Pediatric Friends, at Greek isolated-border regions.

More specifically, volunteer doctors, of almost every medical specialty, offered during expeditions in boarder regions of Thrake, Small and N.E Cyclades, N.E Aegean, Dodekanisa and S.Aegean:

- free of charge preventive examinations, to all citizens (adults and children)
- value adding briefings on health and prevention issues
- entertainment programs for children.



Medical examination by a volunteer doctor of "Open Arms"

During 2008, 14,733 medical actions took place in these regions, most of which concerned children. It is also worth mentioning that, between 2000 to 2008, we actively supported 37 expeditions, with more than 73,000 medical actions taking place



COSMOTE Romania applies systematically, long-term programs, to support children. Within this frame, the company donated to three NGOs, 45,000 € from the income of SMS messages, sent by customers, during the New Year's Day.

Also, AMC Albania, for the first time, donated a significant proportion of the income due to messages sent during New Year's Day, to support the "National Children's Health Centre", which aims to help children with Autism and PDD (Pervasive Development Disorders).

### Theatrical acts for children in hospitals and institutions

For the 4th consecutive year, we supported a pioneering theatrical program, for children in hospitals and institutions. The mobile theatrical act of the Neos Kosmos Theatre, takes place in corridors and hospital rooms, even for a single child. These acts, which aim to offer entertainment, as well as psychological support, are the only acts realized in a systematic way, in our country, by a professional theatre. In 2008, apart from acts taking place in Attica hospitals and institutions (for the 2nd year), 10 performances of the play "What language do we speak, Albert?", were presented to schools, in fire-affected regions of Iliia and Arkadia prefectures.



"Neos Kosmos Theatre" performance in Zacharo villages



More than 1,000 children attended these performances

It is worth mentioning, that AMC Albania cooperated with the NGO "USAID" and the Albanian Health Ministry, to establish a new emergency unit centre, at the "Queen Geraldine" maternity hospital. The hospital did not include an emergency unit, therefore it is estimated that the new centre will considerably contribute to reducing the newborn mortality rate in Albania, which is one of the highest in Europe.



AMC Albania supports children with autism and PDD



## 2. Social Products and Services

### A. We develop products and services for Disabled People

In COSMOTE, we believe that our obligation is to offer everybody equal access to communication services, despite abilities and particularities. For this reason, we seek to exploit technology, through products and services developed, in order to improve the communication options available (and therefore quality of life), for anyone and especially for Disabled People.

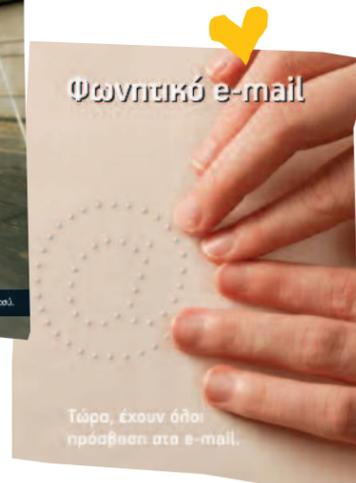
#### Services for people with sight disabilities

##### MobiTalk

We offer our MobiTalk service to individuals with sight problems, in collaboration with the Institute for Language and Speech Processing. This service, aims to make mobile phone use easier for these individuals, by installing a high-tech software, via which all screen information are transformed to voice, while the user scrolls through menus. The service is offered free of charge, in our COSMOTE and GERMANOS retail chain.

##### Voice e-mail

This service provides people with sight problems the ability to manage easily their electronic post. Via voice recognition technology, users are able to hear and answer their e-mails, by giving phonetic commands (free of charge), as well as hearing out loud their inbox. At the same time, they can forward, or erase, electronic messages.



COSMOTE information leaflets on "MobiTalk" and "Voice E-mail" services

#### Services for people with hearing disabilities

##### Video Call

We provide an advanced Video Call service with 50% discount, both for pre-pay and contract customers.

##### SMS Messages

Following the same philosophy, contract and pre-pay customers with hearing problems, are able to send written messages (SMS) with 50% discount, as well as use free of charge emergency services, by sending written messages.

##### Hands Free

We were the first company in Greece, to offer, in 2007, the hands free NoiZfree for users of acoustic aides and helicoids implants. This innovative technology, offers high clarity, quality and volume, facilitating the daily communication of users with hearing problems.



COSMOTE "Video Call" information leaflet

### B. We support scientific programs

COSMOTE believes that research for utilizing new technologies, can improve the quality of life for disabled people, therefore intensively invests in this area.

##### Smart Eyes

Since 2005, we support as Main Sponsor, the pioneering research program "SmartEyes", conducted by the Aristotelian University in Thessalonica. The program aims to pilot-guide individuals with sight problems, within urban environments, via mobile phone. Supporters of this program are two more companies: Microsoft Hellas and Geomatics. One hundred users from Athens and fifty from Thessalonica, are included in the last pilot application phase of the Smart Eyes program. Within 2008, Smart Eyes:

- Was honored with the 2nd award in the category of Best Practice / CSR Initiative / Sustainable Development Solution, during the CEO and CSR Awards 2008.
- Received the "Special Service Innovation" award, during the annual Global Telecoms Business Innovation Awards, in London.
- Received the "Assistive Technology Innovation Award in Transportation", during the ACCESS-IT 2008 Awards, in Brussels.



Smart Eyes mobile phone

##### Sign2Talk

COSMOTE supports one more research program of the Aristotelian University in Thessalonica, which addresses people with hearing problems. The objective is to develop a Multilanguage system, which exports and converts hand information (contextual language) to spoken language and vice-versa. Through this program, we expect that quality of life for people with hearing problems will be improved, since their daily communications will significantly improve. The program aims, to design and develop an intelligent information export system, which can reliably, in real time, convert contextual language to spoken language and vice-versa.

### C. We utilize mobile telephony for the broader wellbeing

Our main objective is to utilize technology, in order to serve people. With sensitivity for the public, we strive to offer communication services, adapted to people's needs.

#### Emergency calls for the public

##### Emergency Services

Mobile telephony, apart from offering the capability to communicate, also strengthens the so called "weak links" within society. Additionally, it facilitates calls to emergency numbers. Indicatively, within 2008, over 2,500,000 emergency calls were made to numbers like 166, 100, 199. It is worth mentioning, that calls to these numbers are free of charge, on our network.

#### Donation service for the public

##### "I Offer" Service

Within the last years, even more institutions make use of short written messages (SMS), in order to conduct radio and tele-donation programs, indicating the important role technology can play, in supporting people's needs.

In order to support social institutions and non-governmental organizations, COSMOTE along with the other two mobile telephony companies (VODAFONE and WIND HELLAS), continued their collaboration to provide the "I Offer" Service, which was collectively developed three years ago.

- This service is supported by 3 four-digit numbers (later five-digit numbers) and is exclusively activated for charity purposes.
- Activation of the service requires a timely application, as well as deposit of required supporting documentation (authorization for conducting a charity), by the charitable Institution/Association.
- The end user sends an SMS with a subject (linked to the specific charitable cause), to the pre-defined four-digit number and is charged 1€/SMS, plus taxes. The gross income from the service, is given to the Institution/Association, which requested the service activation.

It is worth mentioning, that COSMOTE Romania continued its collaboration with the National Union of Deaf People (ANSR), offering 3 million free written messages to its members. The Union has over 30,000 members with hearing disabilities. The cooperation this year, also included provision of a free SMS line (1277), for direct donations to the Union, as well as support of a national program and communication channel, in order to inform the public.

At the same time, the company, in an effort to utilize its products and services for the broader wellbeing, collaborated with the Red Cross, by offering 520 connection packs to volunteers and coordinators of the Red Cross Rescue Teams, during the devastating floods, in the Moldavia region.

The "I Offer" service was activated 7 times during 2008, and the total sum COSMOTE received and forwarded to charities, was 137,582€



ANSR Romania TV spot

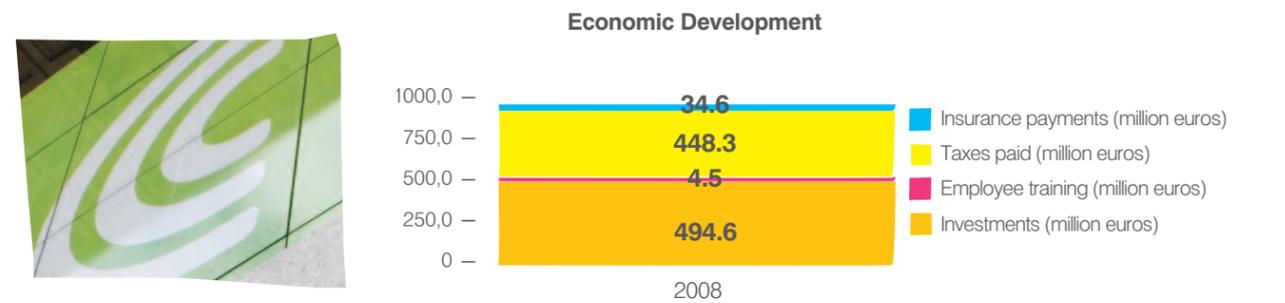


## 3. Economic Development

### A. We support Economies of countries we operate in

COSMOTE, through its operation, supports significantly the Greek economy, as well as the economies of SE Europe countries. For example, we invest in telecommunication infrastructures, create job positions and develop products and services, which contribute to society's development. In 2008, COSMOTE Group:

- Had a turnover of 3,261.7 million €. A significant proportion of this amount, is re-directed to local societies, via payroll, investments and tax contributions.
- Invested almost half billion € (494.6 million) for its development, while only in Greece, our company invested the amount of 177 million €.
- Paid the amount of 448.3 million € in taxes (direct and indirect), to the Greek State.
- Paid the amount of 34.6 million €, for employees' insurance programs.
- Has created in all SE Europe, over 8,000 direct and tens of thousands indirect employment positions (due to our products and services value chain), being one of the most important employers, in countries we operate.



2008	COSMOTE (Group)	COSMOTE (Greece)	AMC (Albania)	GLOBUL (Bulgaria)	COSMOFON (N FYROM)	COSMOTE (Romania)	GERMANOS
Turnover (million €)	3,261.7	1,843.1	191.3	460	66.0	311	1,015.3
Operational Profits (million €)	725.6	606.6	100.3	99.8	1.6	(52.8)	3.5
EBITDA (million €)	1,142.2	781.9	123.8	195.6	19.7	22.5	19.8
Investments (million €)	494	177	29	106	30	130	18
Customers	20,027,224	7,893,144	1,395,989	4,096,996	747,047	5,894,056	
Annual Customer Base increase (%)	28.8%	25.7%	16.8%	5.8%	26%	63.0%	
Population Coverage (%)		99.6%	99.3%	99.96%		98%	

### B. We protect the company, through a Business Continuity System

COSMOTE, as the leading Greek mobile telecommunications company, is obliged to maintain its stable growth and ensure the continuous supply of qualitative telecommunication services, according to needs and expectations of all stakeholders, therefore has to be able to manage unexpected incidents and extraordinary conditions. For this reason, COSMOTE's Business Continuity System, focused on the following issues:

- Compliance of our Business Continuity Plan, with the BS25999 international standard.
- Improve the existing Business Continuity Management System.
- Conduct targeted trainings, operational trials and employee briefing programs.

In order to implement all above, Business Continuity tools are used, according to the BS25999 standard, while informative and educational seminars are conducted, to ensure that all employees, have the appropriate understanding about their role and responsibility, with regard to our business continuity program. In order to progressively integrate our subsidiary companies into the Business Continuity Program, we have prepared a detailed timetable, to develop the essential Business Continuity Plans for subsidiaries abroad and ensure their optimal response, in emergency situations.

## 4. Volunteering

### A. We encourage volunteerism

Aiming to sensitize and mobilize our employees, in order to develop responsible and active citizens, we cultivate volunteerism, through various actions. Examples of such actions, are described below:

#### Sports

With the occasion of COSMOTE supporting the **26th Athens Classic Marathon**, 103 of our employees participated voluntarily in the Marathon, as well as the 5 and 10 km routes. For every kilometer one of our employees run, COSMOTE offered a symbolic amount to the NGOs «**Open Embrace**» and «**Children's Smile**». It is worth mentioning, that our employees' participation increased by 25%, in the 2008 Marathon.

Moreover, our company took the initiative to organize, for the first time, the **COSMOTE CHILDREN GAME 700 m.**, for children aged 9-12. Children participating, over 500 "young athletes", were from the NGOs «Children's Smile» and «Social Pediatrics Friends - Open Embrace», Panathinaikos' football Academy, athletic associations, schools, as well as our own employees' families.



COSMOTE CHILDREN GAME 700m, "young athletes"



COSMOTE employees in the 26th classic Marathon Athens for charitable aim

#### Gathering Clothes

The program "COSMOTE's Family helps Greek Families", was initiated in 2005, when employees were asked to contribute clothes, games, books and foods, which were forwarded to charitable institutions. In 2008, we gathered 91 boxes of toys, school supplies, but mainly clothes.

It is worth mentioning, that COSMOTE Romania's employees systematically participate in social activities, supporting people in need. In Easter 2008, they organised an auction of 30 objects, manufactured by children of the "Save Children" organisation, utilising the company's Intranet. The money collected was offered to the children and their families. Also, during Christmas of 2008, employees offered 15 boxes of clothes, games and books, providing happiness to over 100 children in the "Sfanta Maria" support center in Bucharest.

AMC Albania, aiming to support and alleviate vulnerable social groups, applied for the second year a voluntary visit program to 14 Orphanages, Nursing Homes and Hospitals of 9 Albanian cities, as well as to Hospitals for children in Tirana. At the end of the year, the company also organized visits of employee volunteers, who offered gifts and objects, of first need. Also, the traditional celebration dinner was organized and financed by AMC, for visitors of these institutions.

At GERMANOS Group, in case a function possesses promotional materials, not intended to be utilized, the company gathers these in the warehouse and forwards them, along with food, usually to less well known institutions, which could utilize them. Through this program, the company has supported many institutions, developing a relationship, which is beyond financial donations.



AMC employee volunteers' visit to a nursing home



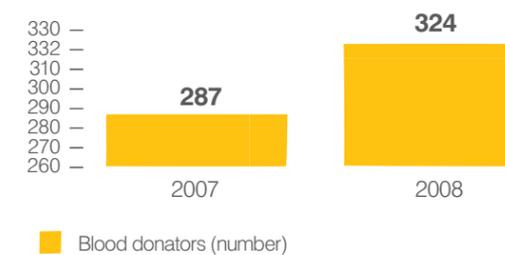
AMC visit an orphanage at Tirana

### B. We encourage blood donation

Voluntary blood donation becomes a conscience, to more and more employees. Employees voluntarily offer blood within events organized by OTE Group twice a year, in collaboration with the G.Gennimatas hospital. Alternatively, employees can offer blood at any hospital of the country and mention the OTE Group blood bank, at the G. Gennimatas hospital. OTE Group's blood donation policy, defines that blood-donators can use half the quantity of blood donated (for a relative of any degree, or a friend), while at the same time, a work leave is provided, as reward for their action.

In 2008, a total of 324 employees offered blood, 13% more, in comparison to 2007.

#### Employee Blood Donation



\* Data refer to COSMOTE Greece.

We increased by 13% the number of blood donors in our company

## 5. Business Enterprising

### A. We inform young people on modern corporate practices

In COSMOTE, we undertake initiatives to systematically brief adults and young people, materializing **specific educational programs** for high school and lyceum students, as well as for students in Universities-Polytechnic Colleges. During these visits, a company tour is conducted, which includes:

- A briefing about technology by our engineers, as well as professional orientation and the way a modern company operates.
- A presentation of our network architecture and our control center.
- A presentation on Base Station technology, 2nd (2G) and 3rd generation (3G) networks, microwave junctions etc.
- A briefing by our scientific personnel (actinophysics), about electromagnetic radiation of Base Stations and mobile phones. During this briefing, we conduct an ad-hoc measurement of electromagnetic radiation level, with a spectrum analyst.

At the same time, visitors have the opportunity to be informed, in an interactive and innovative way, about Base Stations and their operation, at the mobile telephony section of OTE Group's Telecommunications Museum. In 2008, tens of schools and thousands of students visited the **Telecommunications Museum**.



In 2008, more than **600** high school and university students (from Athens and Thessalonica) visited our company, attending the above educational program

Thousands of students visited OTE's Telecommunication Museum

### B. We support technological development

A central pylon of our enterprising operation, is exploiting new technologies and services, to facilitate business innovation, competitiveness, as well as customer facilitation.

COSMOTE Romania in 2008, for the second consecutive year, collaborated with the youth organization **ORICUM**, to operate an electronic interactive platform ([www.mentorship.ro](http://www.mentorship.ro)), which aimed to facilitate the dialogue between young people, who want to orient professionally towards a specific business area, with their potentially future employers.

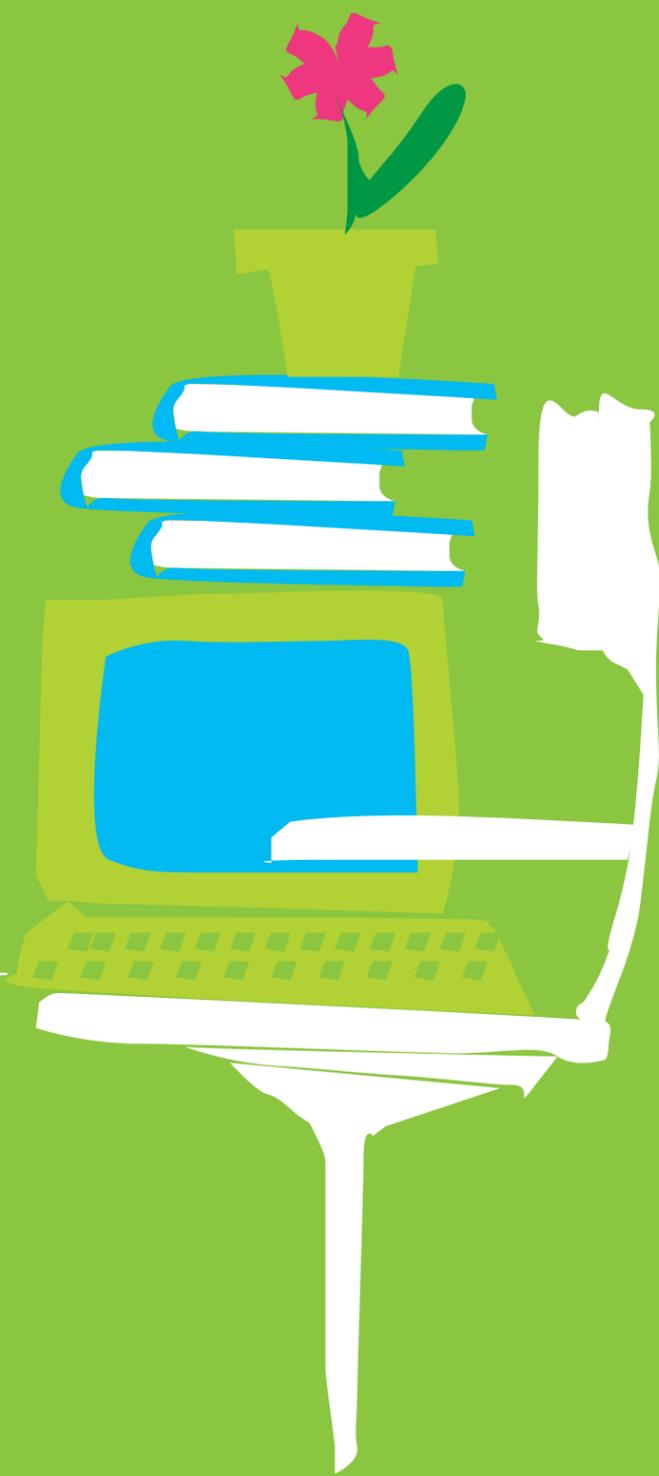
## 6. Targets 2008 and 2009

We said (in 2008)	We have (in 2008)	Progress	We will (to 2009)	Target Date
Align our Business Continuity program with the BS25999 standard and fully deploy a BCP system.	See Section VI-1C	30%	<ul style="list-style-type: none"> <li>■ To gradually integrate subsidiaries, into our BCP program.</li> </ul>	2009
Issue a formal BCP Policy for COSMOTE.	See Section VI-1C	100%	<ul style="list-style-type: none"> <li>■ To re-assess current Business Continuity strategies, according to the BS25999 standard.</li> </ul>	2009
Develop a special informative leaflet for parents, regarding safe use of mobiles.	See Section VI-5A	100%	<ul style="list-style-type: none"> <li>■ To participate in 4 activities of the Road Safety Institute.</li> <li>■ To expand our Ergometrics Program "Join into Sports", to 10 cities in rural areas.</li> <li>■ To hold our Scholarship Ceremony, in a rural area.</li> <li>■ To offer 3 scholarships to students from the Balkan region.</li> <li>■ To publish the scientific outcomes of our "Smart Eyes" program.</li> </ul>	2009 2009 2009 2009 2009



# V

our world *our workplace*



## How can we ensure excellent work conditions, within a competitive landscape?

*briefly...*

**4** countries of operation

**8,844** employees

**31** average age of employees

**295,430** hours of training

### Our philosophy

In all countries of operations, we define policies to respect human rights, provide equal opportunities among employees, avoid discriminations, ensure meritocracy in developing our employees, as well as to protect freedom of association.

### Our objective

To create a workplace, which is safe, fair and facilitates the professional and personal development of our employees.

### Our achievements in 2008:

- We increased by 12.1% the number of employees, within 2008.
- We achieved a 47% proportion of women, within our 1st Line Management Team in COSMOTE Greece, which corresponds to the analogy of women employees overall.
- We increased by 38.5% the analogy of internal job fillings, at COSMOTE Greece.
- In the last 3 years, over 50% of our employees were trained, at least once annually.
- We achieved our standing target of zero fatal accidents.

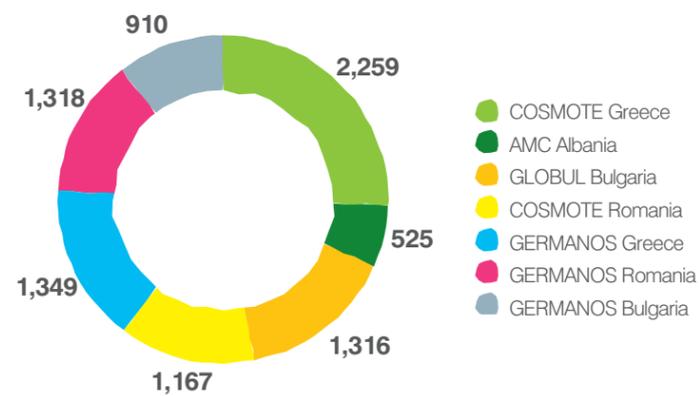
# 1. Job Positions

## A. We create job positions

At COSMOTE we create a positive workplace for our employees, by attracting the best workforce in each country we operate in and by providing the best possible conditions, to work and professionally develop. We directly occupy 8,844 employees, 3,608 of which are located in Greece (Thessalonica, Patras, Athens, Heraklion, Ioannina, Kavala, Larissa, Volos), 2,226 in Bulgaria, 525 in Albania and 2,485 in Romania, while, due to our business activity we have indirectly influenced the creation of tens of thousand more job positions, contributing to the economic development of all countries we operate in.

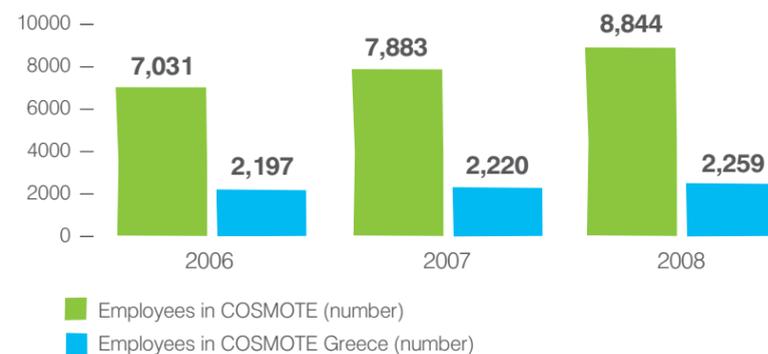
The average age of our 8,844 employees is 31 years, while the corresponding figure for COSMOTE Greece is 35 years.

Allocation of Employees per company - COSMOTE (Group)



Within 2008, we increased by 12.1% the number of our employees

Human Resources - COSMOTE (Group)



\* For comparison reasons, COSMOTE's former subsidiaries in FYROM, are not included in this chapter.

Society's diversity is also reflected within our company, as we occupy corresponding proportions of men and women, younger and older employees, as well as employees from various regions, while we seek to harmoniously integrate disabled people, within our company.

Particularly important is that, while the proportion of men-women employees is almost equal (both within COSMOTE as a Group, as well as COSMOTE Greece), the corresponding proportion of men-woman in our 1st Line Management Team (Directors reporting to the Deputy Managing Director) is 53-47% in Greece and 69-31% in the entire COSMOTE Group, indicative of our equal opportunities policy.



Within 2008, we achieved a 47% proportion of women within our 1st Line Management Team in COSMOTE Greece, which corresponds to the total analogy of women employees

Indicator	Percentage of Women (total)	Percentage of Women (in management positions)	Percentage of Women (in 1st Line Management Team Reporting to the Deputy MD)
COSMOTE Greece (%)	53	30	47
COSMOTE Group (%)	52	31	30

## 2. Health and Safety

### A. We focus on Health and Safety at our workplace

Having as a priority to offer our employees a safe workplace, we focus on ensuring suitable work conditions and follow health and safety rules, in order to protect our employees. This priority, is also reflected in our official workplace Health and Safety Policy.

### Health & Safety Policy

COSMOTE believes that the Health and Safety of its personnel at Work, constitutes a value integral to the company's general culture. The health and safety of its employees constitute a first priority duty for management.

COSMOTE aims to achieve Health and Safety at Work conditions, which will fully respect the requirements laid down by legislation.

COSMOTE adopts a preventive approach in all activity sectors, taking Health and Safety issues into account in all decision-making, prior to all actions aiming at the implementation of such decisions. Thus, it consults with the personnel and encourages its participation in the respective issues.

Management executives should act as role models of **safe behavior** and thus convince all employees of their commitment to the Company's Health and Safety at Work Policy.

COSMOTE commits to providing information, updating and training to the personnel working on its account, so that the personnel itself can contribute, as its is obliged, to the preservation and improvement of Health and Safety conditions at Work.

**Micheal Tsamaz**  
Deputy Managing Director COSMOTE

For this reason:

- All COSMOTE Greece's operations are certified, according to OHSAS 18001 (Occupational Health and Safety Series - OHSAS 18000), for Health and Safety at the workplace.
- We identify labour risks, via documented Occupational Risk Assessments (E TEK). These studies allow us to eliminate, or to limit, respective risks, by taking suitable actions, such as training employees and providing suitable Means of Individual Protection.
- We follow the corporate procedure "Accident-Incident Reporting", according to which, all accidents within the company are analytically investigated, identifying a suitable suggestion-proposal to handle the underlying reasons. At the same time, we notify accidents to the responsible state authorities, according to respective legislation.
- We have established a Health and Safety Committee, which meets quarterly, along with company representatives, in order to discuss issues concerning workplace risks.
- Medical centres have been established in all our buildings, in order for medical personnel (e.g. nurses) to provide first aid and Occupational Doctors to conduct their scheduled visits.

### B. We closely monitor our performance

The results of the above approaches, are reflected in the following table, where incidents related to Health and Safety, are summarised, for the last few years:

	Losses in Employees	Losses in Collaborators	Number of accidents (absence of >1 day)	Number of accidents (absence of > 3 days)	Percentage of involved employees	Total days of absence from work
<b>2006</b>	<b>0</b>	<b>1</b>	<b>11+14</b>	<b>10+10</b>	<b>1.14</b>	<b>115+208</b>
<b>2007</b>	<b>0</b>	<b>0</b>	<b>7+24</b>	<b>4+17</b>	<b>1.42</b>	<b>40+310</b>
<b>2008</b>	<b>0</b>	<b>0</b>	<b>4+12</b>	<b>1+11</b>	<b>0.71</b>	<b>8+131</b>

\* Data refer to COSMOTE Greece.

\*\* First figures refer to accidents within the workplace, while second ones to accidents outside the workplace (e.g. road accidents).

In comparison to 2007, work accidents decreased from 31 to 16, while both the number of accidents within the workplace (from 7 to 4), as well as absence days due to accidents decreased (from 40 to 8). 75% of accidents occurred outside the workplace of COSMOTE, such as road accidents or slipping (before attendance or after leave from the workplace), while the total percentage of employees involved in work accidents was 0.71%.

### C. We intensively train our employees

Our company places particular emphasis on training and sensitizing our employees on Health and Safety issues. Therefore, after 2007, when over 3,900 man-hours of training on safety issues were invested (completing 90% of a program to brief all employees, by a specialized team, on principles of mobile telephony operation and health and safety, related to mobile phone use), within 2008 a total of 312 training sessions were conducted, dedicating over 2,500 man-hours.

Particular focus was given to train climbers on work safety issues, as 148 training sessions and over 2,000 corresponding man-hours were dedicated.

Health & Safety Training (number)



## 3. Fair Employment

### A. We condemn child, forced and unfair labor

Our company respects the internationally recognized principles of human rights, as defined within the UN International Declaration of Human Rights and within the ten Principles of the UN Global Compact (which our company has subscribed to).

The fundamental principles, which define our relationship with our employees, are included in our Code of Conduct, which has been communicated to all employees (see section II-2B). Based on these principles, we are committed not to proceed with employment engagement of individuals, which are below the legal work age limit (as defined by the Greek labour legislation), and under no circumstance will we engage employees below the age of fifteen years.

We also commit ourselves not to follow, or even tolerate, coercive work in our premises. At the same time, we anticipate our suppliers not to occupy individuals below the legal work age, or to tolerate practices of physical harassment, exploitation, or use of coercive work, in any of their premises.

### B. We offer a fair work environment

The principle of equality is the cornerstone of our relationship with our employees, enabling them to advance professionally, according to their performance, their skills and corporate needs. Our company is committed not to make any discriminations due to race, religion, colour, origin, age, special needs, sexual orientation, political beliefs, gender or family status, in any decisions linked to employment issues (e.g. discrimination of wage based on gender). Within this frame, our company institutionalised official Job Position Roles (Job Families Model). More specifically:

- The content of different job positions within COSMOTE was analysed, for all levels of the organization.
- In cooperation with COSMOTE Directors, all employees were matched against the various job position roles, according to the role they have today, within the organization.
- Detailed presentations took place, addressing all employees, in order to brief them on the content and the progress of work conducted. More specifically, 8 full day presentations to middle management took place, as well as 70 half-day presentations to all employees.

The application of this Job Family Model, further strengthens COSMOTE's commitment for employee development, equal treatment and advancement opportunities, according to their qualifications and skills. The Model will also be applied to our foreign subsidiary companies, till 2010.

As a result, no discrimination incidents occurred within COSMOTE, for one more year.

It is worth mentioning, that GERMANOS Group participated in a program to strengthen Employment of Women, implemented by the General Secretariat of Equality. The program, called "Objectives", addresses working women, in order to facilitate their development, harmonise their work-life balance, but also to improve their involvement as employees within their workplace.



## 4. Freedom of Association

### A. We respect freedom of association

COSMOTE respects freedom of association of its employees and their right to form labour unions. As a result, our employees have established and operate the Employee Union of COSMOTE Greece. Each year, our company's Management conducts negotiations with the Union, in order to sign the annual Collective Bargaining Agreement, applicable for the next commencing one or two years.

Overall, 70% of COSMOTE Greece employees participate in our labour Union (Employee Union of COSMOTE Greece), while election of Union representatives is performed directly by our employees.

### B. We respect the right to strike

Our company also respects the right of employees to strike. The causes of strikes and stoppages, in their majority, were directly related to Pan-Hellenic strikes, due to social policy issues (e.g. insurance schemes). Only in a few cases, strikes were attributed to issues related to COSMOTE. Overall, within 2008, 10 strikes and 2 stoppages took place: 5 were related to national strikes (issues announced by the National Labour Union of Greece), while the remaining cases were related to OTE Group (issues announced by OME - OTE).

## 5. Development of Employees

### A. We appraise our employees

Our Performance Appraisal System is critical for the development of our employees. Through this system, we identify strengths and areas for improvement, while actions to facilitate professional advancement of employees are recorded. At the same time, our employees' performance is rewarded, as the appraisal system is linked to the bonus scheme. Within 2008, all COSMOTE Greece employees, which fulfilled the criteria of the respective appraisal procedure (being occupied for over six months), have been appraised.

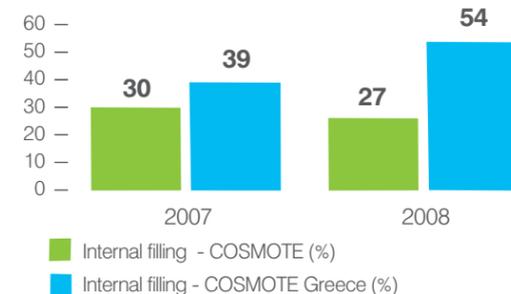
### B. We promote our employees

We place emphasis on developing our own employees, therefore apply a respective procedure, according to which:

- The Human Resources Division assesses which job positions can be filled from within and are therefore announced internally.
- Afterwards, a selection process is followed, which includes a series of interviews and possibly participation in development centres (for candidates fulfilling the position requirements).
- In order to establish a robust and long term internal promotion system, we have created Development Centers, in which candidates for promotion, as well as for re-position (to positions with extended duties), participate.

As a result of this policy, within 2008, 54% of job openings announced in COSMOTE Greece (and 27% in all COSMOTE Group) were covered from within, corresponding to a 38.5% improvement, in comparison to 2007.

#### Internal Filling of Job Positions



In 2008, we increased by 38.5% the analogy of internal job fillings, at COSMOTE Greece

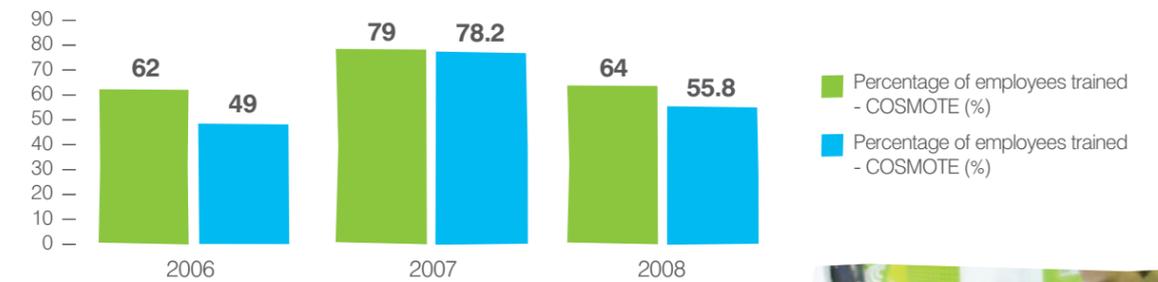


## C. We train our employees

Our company seeks to develop and train all its employees. Indicative of this policy, is the fact that we managed to train over 50% of our employees, at least once a year. Within the frame of developing our employees and in parallel achieve our strategic objectives, we have designed and implemented an extensive training program, addressing issues related to technology, products and services, competencies, people management, customer service etc.

In 2008, we materialized in total 1,574 training programs, which correspond to over 295 thousand training hours (with over 4.5 million € spent) and 33 training hours per employee, in comparison to 1,457 programs, 310 thousand hours and 39 hours per employee, within 2007.

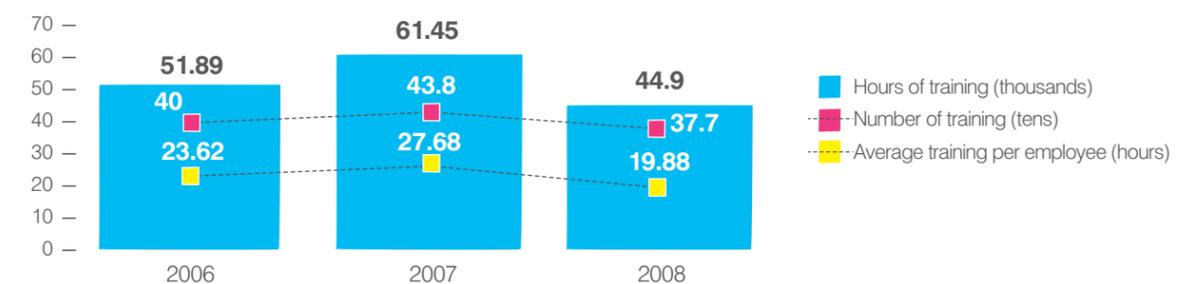
#### Employee Participation in Training



Over 50% of our employees were trained at least once annually, in the last 3 years



#### Employee Training - COSMOTE (Greece)



#### Employee Training - COSMOTE (Group)



## 6. Additional Benefits

### A. We offer additional benefits

Beyond legislative requirements, our company offers employees an extensive additional benefits package, which covers 5 main categories:

#### Insurance – Medical Care

- Private medical care program, for all employees and their protected members.
- Private life insurance program, for all employees.
- Private retirement program, utilised for the company to contribute and strengthen savings options, for all employees.

#### Mobile Telephony Products

- Free corporate mobile phone, for all employees, as well as preferential tariffs.
- Discounts for corporate products, in privately-owned COSMOTE shops.
- Discount for corporate mobile phone upgrades, the amount of which varies, according to each employee's hierarchical grade.
- Other privileges for employees (such as receiving a discount on their mobile bill, by using the COSMOTE EUROBANK VISA).

#### Other Products

- Gift vouchers, for the Christmas and Easter festive periods (in 2007, the sum per voucher increased by 20%).
- Cooperation with various companies, to ensure preferential treatment of employees, for products and services.

#### Family

- Subsidising for nursery cost, up to 260€ monthly, for each child of preschool age (till the first degree of elementary school).
- Favourable policies for working mothers, aiming to achieve a better work-life balance.
- Flexible daily work attendance for all employees (except those employed in shifts).
- Additional days of leave, in cases of special need.

#### Sports –Team Building

- Salespeople and Customer Care Representatives motivation program, aiming to identify and reward best employees (applicable to approximately 23% of the total workforce).
- Salespeople motivation program, regarding promotional activities in our shops (applicable to approximately 10% of the total workforce).
- Organization of athletic activities (e.g. internal 5X5 football and basketball championship, tennis and beach volley tournaments) and other events, aiming to cultivate a team spirit and at the same time employees becoming more active physically.
- Establish a COSMOTE Basketball Team, participating in an external Championship.

The above philosophy is followed in all our subsidiary companies, with the specific programs varying, according to each market. For example, within our GERMANOS Group, the company has created a holistic program of professional orientation for employees' children, which are in the last grade of Lyceum (before University).

Through specialized tests (personality, competencies and special interests), children are supported to identify the direction they want to follow, as far as studies (University and Technical education) or professional orientation is concerned. This 1 day educational program, is conducted by a specialised company of Educational Advisers.



Tennis tournament winners



Internal 5x5 football championship winners

## 7. Satisfaction of Employees

### A. We systematically brief our employees

Systematic briefing and reciprocal communication, contribute towards creating a homogeneous corporate culture. For this reason, starting in 2005, we have established a systematic dialog with our employees, via internal communication processes, utilising various means, such as: internal internet (Intranet) individualized electronic briefings (e-mails), for corporate and other issues web2sms, written messages send to employees' corporate mobiles informative leaflets, via hard copy correspondence quarterly magazine, called "Ston COSMO mas" (In our World).

It is worth mentioning, that in 2008, for environmental reasons, our Corporate Responsibility Report was uploaded on our Intranet, encouraging employees to review it in soft version. At the same time, we strive to develop a common perception and to stimulate active participation of all employees, in our Corporate Responsibility program. Therefore, we conduct extensive briefings to newly hired employees, as well as regular briefings for all our employees, via printed and electronic material.

An example, is the successful communication of COSMOTE Greece's Environmental Management System, resulting the active participation of employees in the system, which addresses their everyday activities: reduction of water and electricity consumption, as well as recycling of paper, ink cartridges, mobile phones, accessories and batteries.

### B. We monitor our employees' level of satisfaction

We monitor and analyze, in a systematic way, our employees' perception about the work environment, in order to identify both our strengths, as well as our potential areas for improvement. This registered perception, combined with our company's strategic objectives, are the basis to develop plans and implement targeted actions, to continuously improve our workplace.

In 2006, we conducted an employee satisfaction survey at COSMOTE Greece and implemented corrective actions, at a local and pan-Hellenic level, based on the outcomes. During the period May-June 2007, the survey results were presented to all our employees. Based on the survey results gathered and employees' perception expressed, the following topics were emphasised:

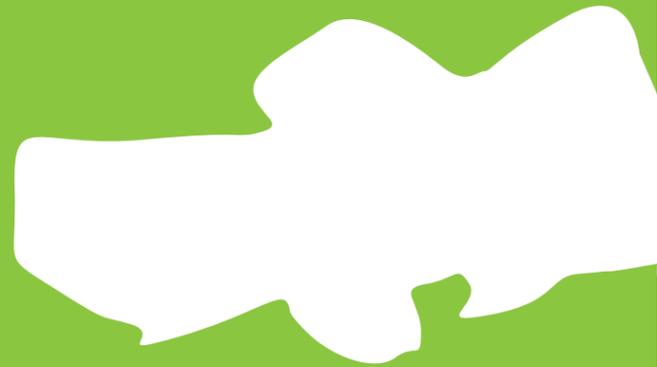
- Plan and implement a system for horizontal and vertical development of employees, via application of a Career Path system (application of Job Family Model).
- Communicate, brief and align individual objectives with corporate objectives.
- Eliminate unnecessary bureaucracy and simplify processes.
- Focus on collaboration between different functions.

## 8. Targets 2008 and 2009

We said (in 2008)	We did (in 2008)	Progress	We will (in 2009)	Target Date
Strengthen our employees' awareness, on Health and Safety issues.	See Section V-2C	100%	To implement a training program for all climbers.	2009
Plan and implement a career path system, in 2008-2009.	See Section V-3B	75%	To implement the Job Family Model, in our subsidiaries abroad. To expand and implement the career path system, in all our functions.	2009 Romania, Bulgaria 2010 Albania
Strengthen our employees' awareness, on Corporate Responsibility issues.	See Section V-7A	100%	To implement a Corporate Responsibility training program. To conduct an employee satisfaction survey. To conduct an employee Corporate Responsibility survey. To expand the employee Performance and Development System, to our subsidiaries.	2009 2009 2009 2009

# VI

our world *our marketplace*



## How can we positively influence the markets we operate in?

*briefly...*

9 leaflets to inform the public

20 million customers

3.2 billion euros turnover

9 BoD members

### Our philosophy

We believe that our size and increasing customer base, results a corresponding increase of our accountability, regarding responsible operation of the Marketplaces we do our business in (including our sales and supply chain), our own responsible internal operation, as well as transparency, towards end users of our products and services.

### Our objective

To follow a management approach, based on the principles of transparency and ethics and at the same time facilitate responsible operation of Marketplaces, where we conduct our business in.

### Our achievements:

- Out of 9 BoD members, 2 are independent and 7 are non-executive.
- We issue 9 leaflets, to sensitize and inform citizens.
- We briefed over 370,000 citizens, about the safe use of the Internet, through leaflets we distributed, while over 1.8 million citizens were informed about the availability of these leaflets.
- We made over 6 million citizens aware of the importance to recycle mobile phone, through TV campaigns.
- We initiated the implementation of a Supplier Code of Conduct.
- We improved customer satisfaction from our call centres and shops, by 10% and 16% respectively, in comparison to 2006.

# 1. Corporate Governance

## A. We operate according to Corporate Governance practices

The highest ranking governance board of our company, responsible to take decisions for important corporate issues (according to legislation KN 2190/20), is the General Assembly of Shareholders. As described in our Internal Code of Operations, the Board of Directors (BoD) is responsible to take any decisions regarding administration, management, resource utilisation and overall in order for our company to achieve its corporate objectives.

- The BoD constitutes of nine (9) members, which are elected by the General Assembly of Shareholders.
- Wages and other compensation of BoD members are defined, according to legislation KN 2190/1920.
- BoD is supported in its operation, by an Audit Committee and a Remuneration & Nomination Committee.

Name	Executive Member	Non Executive Member	Independent Member	Audit Committee (4 Members)	Remuneration Committee (3 Members)
P. Vourloumis	BoD President and Managing Director				
K. Apostolides		BoD Vice President	■	■ President	■
M. Tzamaz	Deputy Managing Director				
Y. Ioannidis		■			■
Ch. Economou		■			
I. Aivazis		■			
E. Despotou		■		■	
G. Mavrakis		■		■	
I. Vezanis		■	■	■	■

The Remuneration & Nomination Committee, is composed of 3 non-executive BoD members (two of these members are independent). The Managing Director and the Human Resources General Director participate in the Committee as well, without however voting rights. Objective of the Committee is to prepare and submit to the BoD proposals, addressing the company's compensation policy, as well as to approve placements of General Directors within the company (following the Managing Director's proposal).

The Audit Committee is composed of 4 non-executive BoD members (two of which are independent). The Committee supports the Board of Directors, in overseeing conformity of our company, in terms of compliance with laws and regulations, completeness and accuracy of published financial statements, effectiveness of our corporate audit system, independence and qualifications of external financial controllers, as well as performance of our company's Audit Department. Audit Committee members evaluate annually their work conducted and present respective results to the Board of Directors, which is responsible to further assess performance.

## B. We control our internal operations

The Internal Audit Department, is responsible to control activities and functions of our company, in order to assess risks which could influence the company (and indirectly our stakeholders). According to results of these assessments, the Internal Audit Department examines the existence and implementation of check points (to identify and avoid respective incidents), such as policies to confront bribery, to accept business presents and to report on misconducts (see section VI-1C).

The same practice is also followed in our subsidiary companies, where local Internal Audit Departments conduct corresponding controls. Also, during the annual Sarbanes-Oxley conformity check, our company examines and reviews control points, which have been established by management and are related to our company's overall operations.

## C. We implement procedures, to ensure responsible internal operation and avoid conflicts of interest

To ensure that our daily practices safeguard our shareholders' interests and at the same time our responsible internal operation, we have adopted a number of codes, regulations and policies, which are communicated and applicable to all employees, managers, executives and BoD members, in order to avoid potential conflicts of interest, between executive management and corporate shareholders. More specifically, we have applied:

- Internal Code of Operations.
- Code of Conduct (see section II-2B).
- Internal Personnel Code and Collective Bargaining Agreement.
- Supplier Code of Conduct (see section VI-4A).
- Anti-Bribery Policy.

This policy describes the rules and restrictions for employees to accept presents, as well as for employees to provide presents to collaborators.

- Present Acceptance Policy.

Our company conducts twice a year draws, to distribute presents offered to employees and BoD members, which are not acceptable, according to the respective corporate Policy. In these drawings, all employees participate, up until the hierarchical level of section manager.



## Whistle blowing mechanism

Our company has institutionalised within COSMOTE Greece and all subsidiary companies:

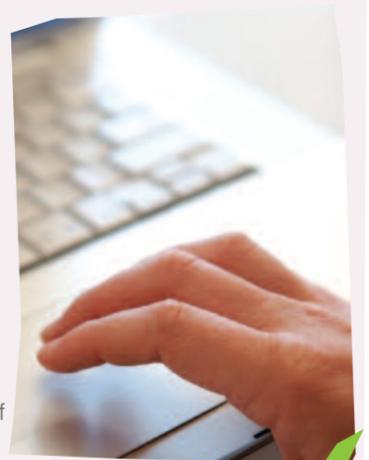
- A Policy for reporting for accounting, accountant and financial control misconducts.
- A Policy for reporting misconducts related to our Code of Conduct infringements (see section II-2B).

Within the frame of these Policies, each employee can (anonymously or not) report to the Audit Committee potential ethical misconducts, which fall into their attention, either by sending a letter to a dedicated postal address, or simply by sending an email ([whistleblowing@cosmote.gr](mailto:whistleblowing@cosmote.gr))

It must be noted that:

- Employees can utilise a sample form, available in the company's web page, to prepare their report.
- Reports are received by the Internal Audit Director, on behalf of the Audit Committee.

These Policies clearly define that COSMOTE does not allow any direct or indirect retaliation actions by corporate management (or other corporate bodies), to anyone who will, in good faith, proceed with reporting, expressing a concern or complaint, regarding infringements of our Code of Conduct or accounting, accountant and financial audit issues.



[whistleblowing@cosmote.gr](mailto:whistleblowing@cosmote.gr)

## 2. Ethical Competition

### A. We comply with competition rules

COSMOTE companies, in the countries in which they operate, comply with the institutional requirements, related to free competition (national and EU).

Specifically in Greece, our company developed a respective Policy, to inform employees on the importance of a company to comply with competition rules and define the guiding lines of our employees' behaviour, in order to conform to these rules. The Policy is accessible to all employees, through our corporate intranet.

It is worth mentioning, that COSMOTE Greece applied a claim to the responsible juridical principles, for a 1 million € fine, imposed by EETT in 2005 (also imposed to two other mobile telephony companies in Greece), for harmonized practices, against the law of free competition. With the 27/2008 Athens Administrative Court of Appeal decision, our claim was accepted and the above-mentioned decision of EETT was cancelled (as the court accepted that our company did not apply illegal - harmonized practices).

### B. We contribute to improve the marketplace

The collaboration of mobile telephony providers, within the frame of official institutions and state laws, can be positive for consumers, quality of services provided and safe use of mobile telephony services. Some examples are:

- **Our active participation** during the consultations which took place in Brussels, under the auspice of the European Committee, for the establishment of a **European Memorandum**, addressing the safe use of mobile phones, by children and teenagers. COSMOTE was the first Greek company to sign the Memorandum, in February 2007, among 15 other European mobile telephony and content provider companies. The Memorandum addresses issues, which aim to ensure the safe use of mobile telephony services by minor users, such as access control mechanisms, sensitization and communication, categorization of commercial content, as well as handling illegal content in products and services of mobile telephony and/or the Internet.
- The collaboration with other mobile telephony providers in Greece, in order to develop a **"Common Code of Conduct for added value services, via mobile phones and protection of minor users"**. Objective of this mobile telephony sector self-regulation process is for minor users to be offered a common level of protection, such as in other European countries.
- The establishment, within 2008, of the non-profit organisation **"Association of Mobile Telephony Companies"**, after the respective approval by EETT (Greek National Regulatory Authority). The Association aims to be an advisory board in regulative processes, to participate in the decision-making processes of legislative or technical committees (at an international, European and national level), as well as to collaborate with institutions and associations in other countries, within the scope of bilateral or multilateral collaborations. Its objective is the collective modernization and development of the mobile telephony sector. To achieve its founding objective, the Association seeks to update its members, follow-up on issues of collective interest, establish positions on respective issues, as well as represent and promote the opinion of its members, in Greece and abroad.



## 3. Responsible Marketing

### A. We apply Responsible Marketing practices

Our company's activities are defined, after taking into consideration the needs of our customers and specific requirements of our employees, as they too are end users of our services. Our company therefore, responds to our customers' needs, as symbolically expressed via the logo... **our world is you.**

From the first day of our operations, COSMOTE has adopted a simple, clear and friendly communication style, towards its customers.

- We ensure that our communication material is legal, appropriate, fair, sincere, corresponds to reality and respects peoples' diversity, in terms of age, gender, race, religion and physical or mental status.
- To guarantee the above, our marketing department controls all advertising messages and campaigns, before deploying them to the public.

As a result, no respective fine was imposed in 2008, by responsible authorities.

### B. We apply transparent pricing practices

On pricing and charging issues, we communicate with clarity and transparency and systematically provide essential information, in order for our customers to receive an objective and clear briefing. For example, the following practices can be mentioned:

#### Usage Information Service

This service is offered automatically and free of charge, to all domestic contract subscribers, with free talk minutes. The service briefs customers, through their printed and electronic account, about the consumption of free talk minutes, in all tariff programs.

#### Service Upgrade for Remaining Time Extension

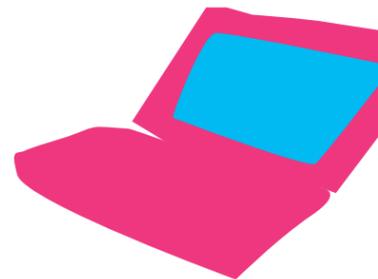
With this service, our customers are allowed to upgrade the extension of their remaining talk time. Consequently, even if no call time is remaining, our customers can extend their speech time, simply by calling a 4 digit number.

#### Development of Roaming Services

We initiated a series of actions to upgrade our roaming services, such as expanding our Roaming network to cover 170 countries, strengthening network coverage (for data and post-pay customers) with clear and rational pricing and reducing prices for inbound and outbound calls. This way, we contribute towards optimizing the quality/price ratio, of our services.

#### Usage Monitoring for Internet On the Go

Via an application called "Internet On the Go Connect Manager", we provide all our Internet On the Go program customers, the option to monitor produced GPRS traffic, at real time, as well as defining a maximum usage limit (customers are automatically informed by the application, if this limit is exceeded). Finally, our customers are also offered the option to review historical data of produced traffic at a daily, weekly or self-defined time interval.

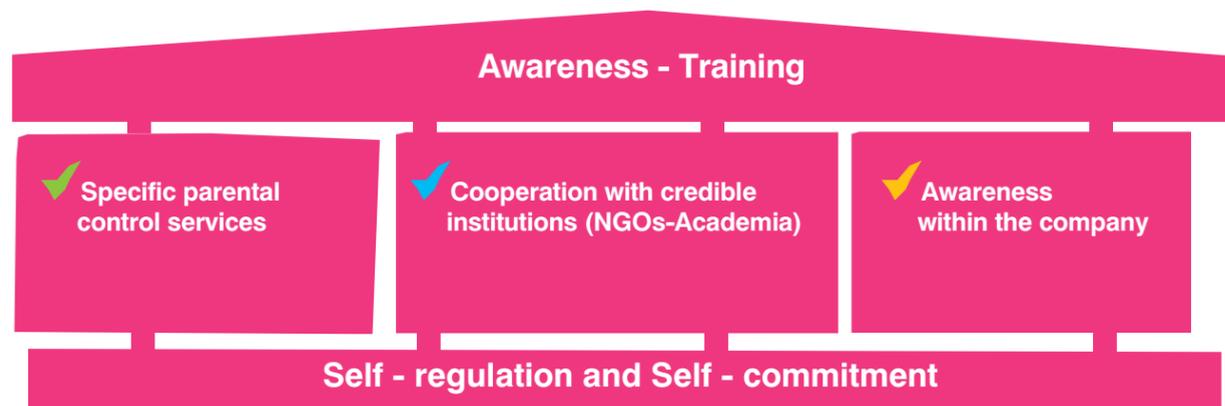


### C. We protect minor users of our services

The use of mobile phones, is gradually deployed to younger age groups, a fact requiring continuous alerting of parents. Parents should be informed properly, about mobile phone functions (such as accessing services, voice calls, sms, sending and receiving photographs and videos, access the internet), to be able to properly decide, about the mobile telephony services, they will permit their children to use.

Within this frame -being convinced that prevention and proper briefing can ensure proper use- we have developed a multi-faceted strategy, for safe use of our services. This strategy, focuses on the following areas:

- Participation in European Initiatives for Self-Regulation and Self-Commitment.
- Development of Parental Control Services, at European level.
- Collaboration with credible Institutions.
- Awareness within the company.
- Briefing, training and sensitization of the public.



#### Self-Regulation and Self-Commitment Initiatives

The objective of the mobile telephony sector self-regulation process and of our company, is for minor users to enjoy a common level of protection, as in other European countries. Therefore, our company:

- Participates, since 2007, in the European Memorandum, for safe use of mobile phones, by children and teenagers (in collaboration with other European mobile telephony companies).
- Collaborated with other mobile telephony companies in Greece, to develop the "Common Code of Conduct for added value services, via mobile phones and protection of minor users". Within 2008, the Code, was further adapted to the European standards.

### Parental Control Services

#### Parental Control Services

Our company developed a line of services, for parents to have the option to manage their children's access to services, which are exclusively addressed for adults. For this reason, we simplified the registration process for these services (as described above) and published respective informative material, which is distributed in all our shops and all countries, where these services are provided (see section VI-5A).



#### COSMOTE My View

The Erotic Zone and Chat categories (within the "Entertainment" menu), are addressed only to adult users, which accept the terms of use. Parents have the option to block access to this content. In the case of Erotic Zone, this can be done via the service menu itself (by selecting the respective command), or via calling the Customer Service Center at 1212 or 1313. In the case of Chat, blocking access is simply initiated via calling the Customer Service Center.

#### Calls Services

Parents have the option, to manage their children's calls to value added service numbers. More specifically, we provide, free of charge, the service to block calls to added value services (i.e. to 10 digit numbers, like 901 and 909, exclusively intended for adults). A customer, can ask to block all 901 and 909 numbers, simply by calling the COSMOTE Customer Service Centre (at 1212, 1313 or 1200).

#### Chat Services

We developed a "Bad Words List" system, applied to our WAP/SMS chat service, restricting use of inappropriate language, within Chat Rooms. At the same time, our company maintains the right to prohibit the use of chat services to individuals, who violate fundamental rules of proper behaviour.

It is worth mentioning that COSMOTE Romania, also offers Parental Control Services for its i-mode services (Erotic and Chat and Date), simply by calling the Customer Service Center.



#### Collaboration with Credible Institutions

Our company collaborates with Institutions, which aim to increase citizens' awareness and inform them on ways to be protected, but also to effectively protect their children, from risks associated with improper use of interactive technologies, such as the Internet and mobile phones. For this reason, we support, as Golden Sponsor, the work of the Greek Node of Safe Internet, who's awareness and sensitisation campaign is materialized under the auspice of the European Committee, as well as the program frame "Safer Internet Plus".



## Sensitization of Public and Employees

Our company systematically informs and sensitizes our employees, parents, teachers, as well as the wider public, both through its retail network, as well as through targeted communication programs. Within this frame:

- We placed 14 national and over 140 local registrations in newspapers.
- Over 150 articles were written, in national and local newspapers, addressing our company's respective activities.
- We inform the public, by distributing three dedicated leaflets, through our entire retail network (in 454 points of sale), with the message "when you have the knowledge, you have the world in your hands".

It is estimated, that within 2008, over 370,000 citizens were informed via these leaflets, while over 1.8 million fellow-citizens were informed, about the existence of these leaflets.

It is worth mentioning, that both COSMOTE Romania, as well as GLOBUL Bulgaria, have also signed the European Memorandum, for Safe Internet Use.

## 4. Responsible Procurement

### A. We influence our Supply Chain

Our Principles, which define our relationship with Suppliers, are included in our Code of Conduct, which has been communicated to all employees (see section II-2B). Within this frame, our company:

- Behaves towards partners and suppliers with respect and transparency.
- Provides equal opportunities for vendors to become our suppliers, by following an objective and fair selection process.

In parallel, we recognize, that our own responsible operation can be influenced by our suppliers' activities and that, due to our size, we have a moral obligation to influence positively our value chain, by deploying Corporate Responsibility principles. Therefore, we developed a Supplier Code of Conduct, in the frame of which:

- We expect from our partners and suppliers to apply best practices of corporate ethics, to operate according to respective legislation and internationally agreed regulations, but also to be socially and environmentally sensitive.
- We expect our collaborators to respect the principles and aspects of this Code.
- Conformity to the Code, is a criterion within our vendor selection and evaluation process.
- We recognize our responsibility to have a dialog with our collaborators, we well as to educate them, when required, on the Corporate Responsibility practices we follow.

The **Code** includes, among other, the following sections:

Labor	Health and Safety	Environment	Ethics
(based on the SA8000 standard)			
■ Free Choice of Employment	■ Work Safety	■ Pollution Precaution / Reduction of Natural Resource Usage	■ Corruption, Extrusion and Abuse
■ Avoidance of Child Labor	■ Locations	■ Hazardous Substances, Liquid and Solid Waste	■ Information Reveal
■ Work Hours	■ Physical Intense Labor	■ Environmental Policy	■ Illicit Advantages
■ Terms and Payments	■ Health and Safety Policy		■ Intellectual Property Protection
■ Behavior			
■ Non-Discrimination			
■ Freedom of Association			

It is worth noticing, that COSMOTE Romania adopted the Supplier Code of Conduct within 2008, in order to ensure that its suppliers, follow the same principles as our company, as far as environmental, health and safety issues are concerned.

## 5. Public Sensitization

### A. We provide information to the public



#### Informing the Public

We are convinced, that we can contribute to sensitize and inform the public, on social and environmental issues, as well as on issues specifically related to our products and services. For this reason, we utilise various communication channels (such as printed leaflets and television spots), to communicate useful and practical messages, with regard to mobile telephony and social issues, in all Corporate Responsibility pillars we operate in. Some examples, are mentioned below:

#### Pillar "Ecology" Recycling

- Within 2008, we conducted a mass communication campaign, via television spots, aiming to brief the public on the underlying reasons to recycle mobiles, batteries and accessories. It is estimated, that over 6 million citizens were exposed to this message, which contributed to increase the level of electrical and electronic waste recycling (proven by the increase of recycled materials).

- We distribute an informative leaflet, providing information to citizens on the options they have to recycle mobile phones, accessories and batteries, ink cartridges and domestic batteries, in all our retail shops in Greece (see section III-3D).

- We inform about the importance of recycling and seek to place dedicated recycle bins, in major artistic and athletic events, sponsored by our company (such as the MADONNA concert in September 2008 and football games of Panathinaikos F.C.).

#### Pedion 24

This leaflet refers to our EMF Measurement Program (see section III-8B).

Overall, it is estimated that over **450,000** citizens received these leaflets

#### Pillar "Society" Life with our Mobile Phone

We created a leaflet, which provides useful information on mobile etiquette, on how to avoid mobile phone theft etc.

#### Safer Internet

We created 2 leaflets, which provide information, on how to safely use the Internet (see section IV-3C).

#### Pillar "Marketplace"

##### Mobile Telephony and Parenting

Within this leaflet, we provide information on how parents can ensure, that their children use mobile services safely (see section VI-3C).

#### Products

Within these three informative leaflets, we describe our products and services for Disabled people (see section IV-3A).



"Pedion 24" and "Life with our Mobile Phone" brochures

It is also worth noticing, that GLOBUL Bulgaria organized, for the second continuous year, a national campaign addressing safe driving, under the title "Drive Safely! Use HANDS-FREE!". The campaign, aimed to promote the safe use of mobile phones while driving, with the use of Hands-free devices. Vladimir Arabadiev, a well known Formula 1 driver in Bulgaria, is Ambassador of this campaign. The campaign received an award, by the Bulgarian Association of Public Relations, within the category "Important social program, of a private company".



"Drive Safely! Use Hand Free" national campaign in Bulgaria

## 6. Customer Satisfaction

### A. We offer high quality products and services

On a monthly basis, we roughly handle 1,100 written remarks-complaints and 700 e-mails by customers, the majority of which are processed in less than 2 working days (for complaints) and 2 working hours (for e-mails). Although the number of customer complaints, does not exceed 1% of overall monthly contacts by our customers, the importance we place on proper complaints handling is high.

The basic principles of our methodology are:

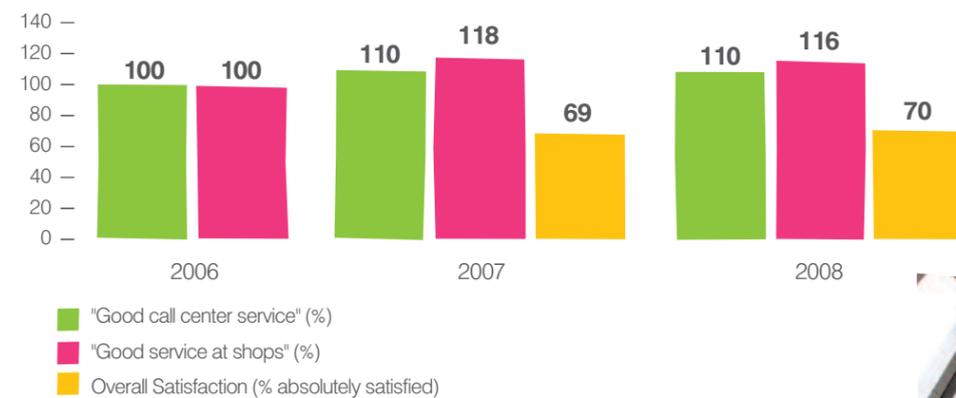
- Central follow-up
- Single registration application and follow-up of progress
- Homogeneous customer-centric management philosophy, by all involved parties
- Quality assurance
- Strengthening corrective/preventive actions
- Annual or by-annual review, to adopt to customer expectations
- Monthly management reporting.

### B. We monitor our customers' satisfaction

We seek to be the preferred choice of customers, by cultivating a reciprocal, sincere and trustful relationship with them. For this reason, we closely monitor our performance, on satisfying our customers, through a series of surveys, which are carried out via telephone interviews, on a representative sample of the public.

As indicated below, our customers' satisfaction regarding services provided within our retail shops and call centres, have improved since 2006 (2006 results are defined as the basis, representing the number 100), by 16 and 10 percent respectively. At the same time, the percentage of our customers, which stated "absolute satisfaction" by our company, is consistently positioned in the particularly high level of 70%.

**Customer Satisfaction** (agreement with statement)



\* Data refer to COSMOTE Greece.

\*\* Figure 100, is defined as a base and corresponds to 2006 results (with the exception of Overall Satisfaction).

In 2008, we improved satisfaction of customers from our call centers and shops, by 10% and 16% respectively, in comparison to 2006



## 7. Data Credibility and Safety

### A. We ensure personal data protection

To guarantee confidentiality of personal data and communication content, we utilise safety policies and processes, as well as strict control mechanisms. Our company's sophisticated mechanisms and specialized personnel, co-ordinated by the Information Safety Department, ensure safety in communication, for all our customers.

### B. We ensure data credibility

To ensure credibility of data reported to our Stakeholders, we audit data, such as environmental, financial, health and safety, within the frame of our re-certification of management systems and audits conducted by our mother company.

## 8. Targets 2008 and 2009

We said (in 2008)	We did (in 2008)	Progress	We will (in 2009)	Target Date
Distribute leaflets of the Hellenic Node for Safe Internet saferinternet.gr, in our COSMOTE and GERMANOS retail shop chain.	See Section VI-5A	100%	To participate in a survey, about the safe use of the Internet.	2009
Further development of safe parental control methods.	See Section VI-3C	50%	To implement a campaign, about safe driving.	2009
Initiate communication and briefing campaigns, to inform the public, on safe mobile use and parental control.	See Section VI-3C	100%	To inform citizens in rural areas, about the use of parental control methods.	2009
Improve communication, in order to inform and sensitize the public, on issues of recycling and environmental protection.	See Section VI-5A	100%	To communicate recycling issues, through major events we sponsor.	2009
			To place recycling bins in buildings of our Corporate Customers and Partners.	2009
Initiate a Supplier Code of Conduct and communication, throughout our supply chain.	See Section VI-4A	50%	To re-assess the process to implement our Supplier Code of Conduct.	2009

# VII

## information about the report

### 1. Summary Table

SECTION	2007	2008
<b>MANAGEMENT</b>		
Quantitative indicators within the Report (number)	37	112
GRI indicators within the Report (number)	30	66
Members in Corporate Responsibility Section (number)	NR	4
Stakeholder Groups (number)	NR	11
<b>ECOLOGY</b>		
Overall CO <sub>2</sub> emissions (from offices, transportation, shop, backbone network, BTS) (tn)	NR	117,525
Overall energy consumption (from offices, transportation, stores, backbone network, BTS) (MWh)	NR	150,163
Renewable energy use (BTS number)	NR	37
Petrol consumption (thousand lt)	2,483.15	2,336.93
Water consumption (m <sup>3</sup> )	14,420	20,006
Packaging material consumption (tn)	297.7	273.6
Office paper consumption (tn)	29.5	38.6
Mobile & accessories recycling (tn)	1.32	9.42
Lead batteries recycling (tn)	45.6	93.5
Paper recycling (tn)	26.5	46.7
Lubricants recycling (thousand lt)	3.61	20.34
WEEE recycling (tn)	72	17.78
Bio-degradable bags acquisition (million)	1.0	1.9
EMF measurements (million - estimation)	NR	4
Road transportation distance (million km - estimation)	5.56	5.48
<b>SOCIETY</b>		
Investments (million €)	NR	494.6
Taxes paid (million €)	NR	448.3
Social Products (number)	MA	3
Employees blood donators (number)	287	324
<b>WORKPLACE</b>		
Number of employees (number)	7,883	8,844
Fatal accidents (number)	0	0
Accidents with absence >1 of day (number)	31	16
Women Managers (%)	NR	30.3
Training (thousand hours)	310.64	295.43
Employees participating in Unions (COSMOTE Greece - %)	NR	70
<b>MARKETPLACE</b>		
Customers (million)	15.5	20
Turnover (billion €)	NR	3.2
Independent BoD Members (number/total)	NR	2/9
Non-Executive BoD Members (number/total)	NR	7/9
Informed citizens (million - estimation)	NR	8.1

NR = Not reported data

### 2. Global Compact and GRI Tables

The correspondence between the content of this Report and the 10 UN Global Compact's Principles, as well as the Global Reporting Initiative's (GRI - G3) Profile and Performance Indicators, is presented in the following tables.

- Additional GRI Indicators are indicated in **blue** background, while Core GRI Indicators are indicated in white background.
- Coverage of Indicators is characterized as Full (F), Partial (P), Not Reported (NR) or Not Applicable (NA).

#### A. Global Compact Table

Issue	Principle	Report Section	Coverage
<b>Human Rights</b>			
1.	Support and respect protection of internationally proclaimed human rights	V-3	F
2.	Ensure not to be complicit in human rights abuses	V-3, II-2	F
<b>Labour Standard</b>			
3.	Recognize freedom of association and right to collective bargaining	V-4	F
4.	Eliminate all forms of forced and compulsory labour	VI-4, V-3	F
5.	Abolish effectively child labour	VI-4, V-3	F
6.	Eliminate discrimination in respect to employment and occupation	VI-4, V-3	F
<b>Environment</b>			
7.	Support a precautionary approach to environmental challenges	III-8	F
8.	Promote greater environmental responsibility	III-1-8	F
9.	Encourage development and diffusion of environmentally friendly technologies	III-1-8	F
<b>Corruption</b>			
10.	Work against all forms of corruption, including extortion and bribery	VI-1,2,4 II-2	F

## B. GRI Principle Table

GRI Paragraph	Summary of Aspect	Report Section	Coverage/ Omission
<b>Strategy and Analysis</b>			
1.1	Most senior executive statement	A,B	F
1.2	Description of key impacts, risks and opportunities	A,B, II-1A	F
<b>Organisational Profile</b>			
2.1	Name of the organization	I-2	F
2.2	Primary brands, products, and/or services	I-3	F
2.3	Operational structure of the organization (main divisions, operating companies, subsidiaries, joint ventures).	I-2B	F
2.4	Location of organization's headquarters	I-2A	F
2.5	Number of countries organization operates (and those with major operations or specifically relevant to TBL)	I-2A	F
2.6	Nature of ownership and legal form	I-2A	F
2.7	Markets served (geographic breakdown, sectors served, types of customers).	I-2A, IV-3A	F
2.8	Scale of the reporting organization	I-3A, B	F
2.9	Significant changes in report period (size, structure, owner)	I-2C	F
2.10	Awards received in the reporting period	II-3B	F
<b>Report Parameters</b>			
3.1	Reporting period (e.g. fiscal/calendar year)	C	F
3.2	Date of previous report	C	F
3.3	Reporting cycle (annual, biennial)	C	F
3.4	Contact point for questions	C	F
3.5	Process for defining report content	II-1A	F
3.6	Boundary of the report (countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers, see Protocol )	C	F
3.7	Limitations on scope or boundary of report	C	F
3.8	Basis for reporting (on joint ventures, subsidiaries, leased facilities, outsourcing) can significantly affect comparability from period to period	C	F
3.9	Data measurement techniques, bases of calculations, (assumptions, estimations techniques, compilation, diverge from, the GRI Indicator Protocols)	C	F
3.10	Effect and reasons of information re-statements (mergers/acquisitions, change of base years, methods).	C	F
3.11	Significant changes (scope, boundary, methods)	C, I-2C	F
3.12	Table for location of Standard Disclosures	VII-2	F
3.13	Policy and practice for seeking external assurance	C, VI-7B	F
<b>Governance, Commitments and Engagement</b>			
4.1	Governance structure (e.g. BoD committees strategy or oversight)	VI-1A, II-2A	F
4.2	BoD Chair also executive officer	VI-1A, I-2B	F
4.3	BoD members that are independent and/or non-executive	VI-1A	F
4.4	Mechanisms for shareholders and employees recommendations to BoD	VI-1A,C	F
4.5	Link of BoD members, senior managers, executives' compensation (incl. departure arrangements) with TBL	VI-1A	F
4.6	Processes for BoD to ensure conflicts of interest avoided	VI-1C	F
4.7	Determining qualifications of BoD for guiding TBL strategy	VI-1A	F
4.8	Mission, values, codes of conduct, principles relevant to TBL	II-2A	F
4.9	BoD procedures for overseeing management of TBL (risks, opportunities, compliance with standards, codes, principles)	II-2A, VI-1A	F
4.10	Processes for evaluating BoD performance on TBL	II-2A, VI-1A	F
4.11	Whether and how precautionary approach addressed	III-8A, B, VI-3A, III-1A	F
4.12	TBL principles and initiatives the organization subscribes	II-3B	F
4.13	Membership in associations (industry, national/international, governance bodies, projects, committees, substantive funding beyond membership, strategic membership)	II-3A, B V-7A	F
4.14	Stakeholder groups engaged by the organization	II-4A	F
4.15	Basis for identification and selection of stakeholders	II-4A, II-1A	F
4.16	Stakeholder engagement approach (frequency, type, group)	II-4A, B	F
4.17	Concerns raised by stakeholders and responds (report)	II-4A	F

## C. GRI Indicator Table

GRI Paragraph	Summary of Aspect	Report Section	Coverage/ Omission
<b>ECONOMIC Economic performance, market presence, indirect economic impact</b>			
Mngt Practice	Goals and Performance	IV-3A, IV-0	F
Mngt Practice	Policy (commitment)	A,B, IV-0	F
Mngt Practice	Additional Contextual Information (success, shortcomings, risks, opportunities)	IV-3A	F
<b>Economic Performance</b>			
EC1	Direct economic value	IV-3A	F
EC2	Financial implications due to Climate Change	III-2, I-1	F
EC3	Benefit plan coverage	V-3A, B, 6A	P
EC4	Financing assistance from Government	-	NR
<b>Market Presence</b>			
EC5	Ratios of entry wage to minimum wage	-	NR
EC6	Spending on locally based suppliers	-	NR
EC7	Engagement of local personnel	-	NR
<b>Indirect Economic Impacts</b>			
EC8	Impact of infrastructure investments and services	IV-3A	F
EC9	Indirect economic impact	IV-3A	F
<b>ENVIRONMENT Materials, energy etc.</b>			
Mngt Practice	Goals and Performance	III-0,9	F
Mngt Practice	Policy (commitment)	III-0, III-1A	F
Mngt Practice	Organizational Responsibility (operational structure)	II-1A	F
Mngt Practice	Training and Awareness	III-8C, VI-5A, V-7A	F
Mngt Practice	Monitoring and Follow Up (supply chain, certifications, auditing)	II-2B, VI-4A	F
Mngt Practice	Additional Contextual Information (success, shortcomings, risks, opportunities)	III-0,9	F
<b>Materials</b>			
EN1	Materials used (weight or volume)	III-3, VII-1	F
EN2	Recycled materials used (percentage)	III-3B	F
<b>Energy</b>			
EN3	Direct energy consumption (by source)	VII-1, III-2	F
EN4	Indirect energy consumption (by source)	VII-1, III-2	F
EN5	Energy saved due to improvements	III-2B, C, D VII-1	F
EN6	Initiatives for energy efficient/renewable based products	III-2C, VII-1	P
EN7	Initiatives for indirect energy consumption (result)	III-2B,C,D	F
<b>Water</b>			
EN8	Water withdrawal (by source)	III-5A	F
EN9	Water sources affected	III-5A	F
EN10	Water recycled (percentage, volume)	-	NR
<b>Biodiversity</b>			
EN11	Areas of high biodiversity value	III-7A	F
EN12	Impact on biodiversity	III-7A	F
EN13	Habitats protected or restored	III-7A	P
EN14	Plans for biodiversity management	III-7A	P
EN15	Red List of IUCN species (by number)	III-7A	P
<b>Emissions, Effluents, Waste</b>			
EN16	Direct and indirect GHG emissions (by weight)	III-2A, VII-1	F
EN17	Indirect GHG emissions	III-2A, VII-1	F
EN18	Initiatives and achievements on GHG (by weight)	III-3B,C	P
EN19	Emission of ODS (by weight)	III-4A	P
EN20	Emission of NOx, SOx (by type, weight)	III-5B, 6A	P
EN21	Water discharge (by quality, destination)	III-5A	P
EN22	Waste (by type, disposal method)	III-3, VII-1	F
EN23	Significant spills (by type, volume)	III-5A	P
EN24	Hazardous waste handling (by weight, percentage)	III-3F, G, H, I, J	F
EN25	Water discharge impact on biodiversity	III-7A	P
<b>Products and Services</b>			
EN26	Initiatives of environmental impact of products	III-3F	F

EN27	Products sold vs reclaimed (by percentage, category)	III-3F	F
<b>Compliance</b>			
EN28	Fines and sanctions of non-compliance (by value, number)	VII-1	F
<b>Transports</b>			
EN29	Impact of people and product transportation	III-6A	F
<b>Overall</b>			
EN30	Investment for environmental protection (by value, type)	-	NR
<b>LABOUR PRACTICE</b>	<b>Employment, labor relations, OHS, training, diversity etc.</b>		
Mngt Practice	Goals and Performance (link to universal standards)	V-0, 8	F
Mngt Practice	Policy (commitment, link to universal standards)	V-0, 3A	F
Mngt Practice	Organizational Responsibility (most senior position)	I-2B	F
Mngt Practice	Training and Awareness	II-2A, V-5C, V-7A	F
Mngt Practice	Monitoring and Follow Up (supply chain, certifications, auditing)	II-2B, VI-4A	F
Mngt Practice	Additional Contextual Information (success, shortcomings, risks, opportunities)	V-0,8	F
<b>Employment</b>			
LA1	Workforce (by type, contract, region)	V-1A	F
LA2	Turnover of personnel (by age group, gender region)	-	MA
LA3	Benefits of full time vs part time employees (by operation)	V-6A	F
<b>Labour/Management Relations</b>			
LA4	Employees with collective agreements (by percentage)	-	NR
LA5	Minimum notice period for operational changes	-	NR
<b>Occupational Health and Safety</b>			
LA6	Employees represented by HS committees (percentage)	II-2A	F
LA7	Injury, disease, lost days, absenteeism, fatalities (rates)	V-2A,B	F
LA8	Education with regard to serious diseases	V-2A,B, III-8E	F
LA9	Health and Safety issues in collective agreements	V-2A, II-2A	F
<b>Education and Training</b>			
LA10	Training (by average hour, employee category)	V-5C	F
LA11	Programs for lifelong learning and career	V-5A,B,C	P
LA12	Employees with appraisals (by percentage)	V-5A	P
<b>Diversity and Equal Opportunity</b>			
LA13	Breakdown of employees (by category, gender etc.)	V-1A	F
LA14	Ratio of basic salary of men of/women (by type)	-	NR
<b>HUMAN RIGHTS</b>	<b>ILO Tripartite Declaration: procurement practices, discrimination, child labor, forced labor, grievance practices, security practices, indigenous rights</b>		
Mngt Practice	Goals and Performance (link to universal standards)	V-0, 8	F
Mngt Practice	Policy (commitment, link to universal standards)	V-0, 3A	F
Mngt Practice	Organizational Responsibility (most senior position)	I-2B	F
Mngt Practice	Training and Awareness	II-2A, V-5C, V-7A	F
Mngt Practice	Monitoring and Follow Up (supply chain, certifications, auditing)	II-2B, VI-4A	F
Mngt Practice	Additional Contextual Information (success, shortcomings, risks, opportunities)	V-0,8	F
<b>Investments and Procurement Practices</b>			
HR1	Investments with human rights screening (by percentage, number)	VI-4A, V-O	P
HR2	Suppliers and contractors with human rights screening (percentage)	VI-4A	P
HR3	Training on human rights (by percentage, hours)	VI-1B, II-2B	P
<b>Non-discriminations</b>			
HR4	Discrimination incidents (number)	V-3B	P
<b>Freedom of Association and Bargaining</b>			
HR5	Operations identified with freedom in risk and actions	V-4A	F
<b>Child Labour</b>			
HR6	Operations identified with child labour risk and actions	V-3A, VI-4A	F
<b>Forced and Compulsory Labour</b>			
HR7	Operations identified with forced labour risk and actions	V-3A, VI-4A	P
<b>Security Practices</b>			
HR8	Security personnel training on human rights (percentage)	II-2A	P
<b>Indigenous Rights</b>			
HR9	Violations of indigenous rights and actions (number)	V-3A	P

<b>SOCIETY</b>	<b>Community, corruption, public policy, anti-competitive, compliance</b>		
Mngt Practice	Goals and Performance	IV-7,0	F
Mngt Practice	Policy (commitment)	IV-0, II-1A	F
Mngt Practice	Organizational Responsibility (most senior position)	II-2A, I-2B	F
Mngt Practice	Training and Awareness	II-2B, V-7A	F
Mngt Practice	Monitoring and Follow Up (supply chain, certifications, auditing)	II-2B, VI-4A	F
Mngt Practice	Additional Contextual Information (success, shortcomings, risks, opportunities)	IV-0,7	F
<b>Community</b>			
SO1	Programs to manage impact on community (by stage)	IV-2A, B, C, IV-3,4,5,6	F
<b>Corruption</b>			
SO2	Units analysed for risks (percentage, number)	VI-1A, B, II-2A	F
SO3	Employees trained on anti-corruption policies (percentage)	II-2A	P
SO4	Actions taken on incidents	VI-A,B	F
<b>Public Policy</b>			
SO5	Public Policy positions and lobbying practices	-	NR
SO6	Contribution to political parties and institutions (value)	-	NR
<b>Anti-Competitive Behaviour</b>			
SO7	Legal actions for anti-trust and monopoly practices (number, outcome)	VI-2A, VII-1	P
<b>Compliance</b>			
SO8	Fines and sanctions for anti-tust and monopoly practices (value, number)	VI-2A, VII-1	P
<b>PRODUCT RESPON/LITY</b>	<b>Customer HS, labeling, communication, privacy, compliance</b>		
Mngt Practice	Goals and Performance	VI-0,8	F
Mngt Practice	Policy (commitment)	VI-0, II-1A	F
Mngt Practice	Organizational Responsibility (most senior position)	I-2B	F
Mngt Practice	Training and Awareness	VI-5A, V-7A, II-2A	F
Mngt Practice	Monitoring and Follow Up (supply chain, certifications, auditing)	II-2B, VI-4A	F
Mngt Practice	Additional Contextual Information (success, shortcomings, risks, opportunities)	V-0,8	F
<b>Customer Health and Safety</b>			
PR1	Life cycle HS analysis of products (by stage, percentage)	III-3F, III-8A-D	F
PR2	Non-compliance with regulation and voluntary codes (by number, outcomes)	V-3	P
<b>Labelling</b>			
PR3	Products with labelling requirement (by type, percentage)	VI-2A	F
PR4	Non-compliance incidents (by number, outcomes)	VI-2A	P
PR5	Practices of customer satisfaction (results)	VI-6A,B	F
<b>Marketing Communication</b>			
PR6	Programs for adherence to law and optional codes	VI-3A	F
PR7	Non-compliance incidents (by number, outcomes)	VI-3A,B	P
<b>Customer Privacy</b>			
PR8	Substantial complaints for privacy, lost data (by number)	VI-7A	P
<b>Compliance</b>			
PR9	Fines concerning use and provision (by value)	-	NR

### 3. Glossary

**Biodiversity (or Ecosystem):** The variety of living organisms, in a geographical area.

**Business Continuity Planning (BCP):** A management approach, which proactively handles issues a company could face (e.g. disaster, crisis), in order to ensure the continuation of offered services and products.

**Base Station (BTS):** Installations in a region (including antennas), which are used to transmit data or voice, from a mobile through the backbone network and further to another mobile.

**Customers:** The final users of COSMOTE's products and services.

**Company:** Refers to COSMOTE.

**Corporate Social Responsibility or Corporate Responsibility (CSR, CR):** The voluntary commitment of companies to include in their corporate practices economical, social and environmental criteria and activities, that are beyond the legislative requirements and are related to their impact on Stakeholders.

**Electro Magnetic Field (EMF):** The non-ionising radiation emitted by mobile phones and base stations (used to transmit data and voice)

**European Foundation for Quality Management (EFQM):** A non for profit organisation, based in Brussels, which promotes Business Excellence, and within this frame also Corporate Responsibility. EFQM has more that 800 member organisations all over the world, including corporations, public institutions, universities etc.

**Solid waste:** Solid by-products of domestic or industrial activities, such as construction.

**Sustainable Development (Sustainability):** The concept of aiming at economic development, without undermining the potential of future generations, to satisfying their own needs.

**World Declaration on Human Rights:** The declaration voted by the General Assembly of the UN in 1948, defining the worldwide recognised fundamental human rights ([www.un.org/overview/rights.html](http://www.un.org/overview/rights.html)).

### 4. Feedback Form

You are invited to improve COSMOTE's Corporate Responsibility Report, by completing this Feedback Form, which is located in our website [www.cosmote.gr](http://www.cosmote.gr)

This report has been printed on paper, certified with ECO LABEL  by the E.U., including 40% recycled paper and 55% FSC  Sustainable Wood.



CORPORATE RESPONSIBILITY PROGRAMME