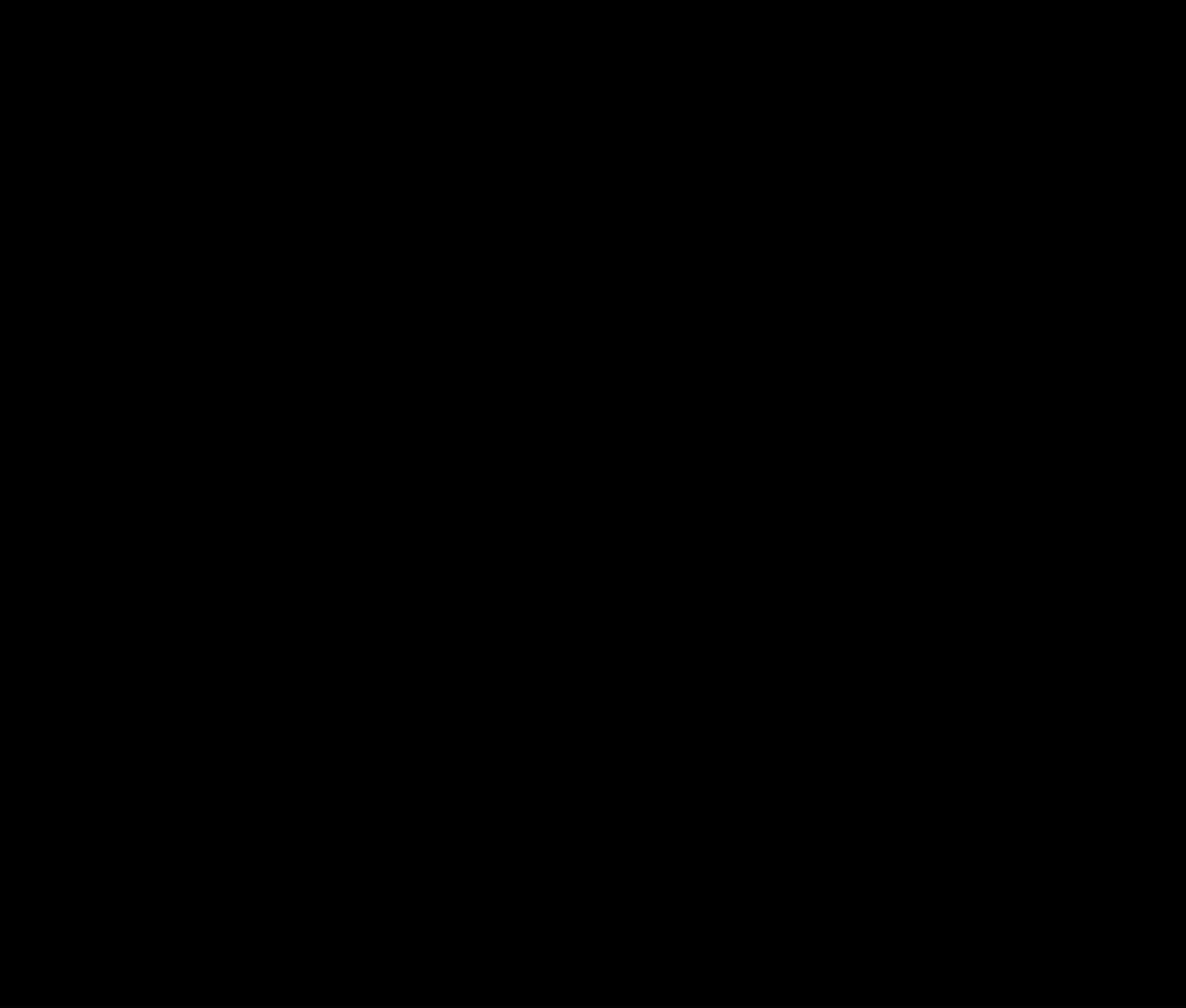
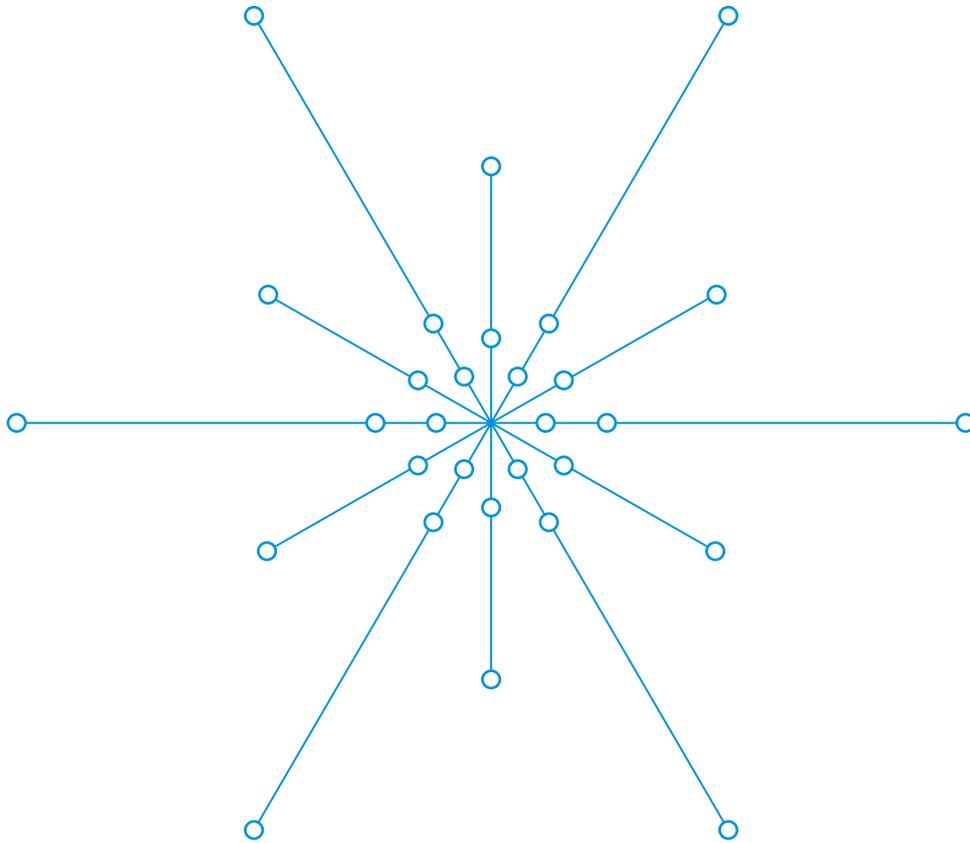


2017

[year of connectivity]

WIND





2017

[year of connectivity]

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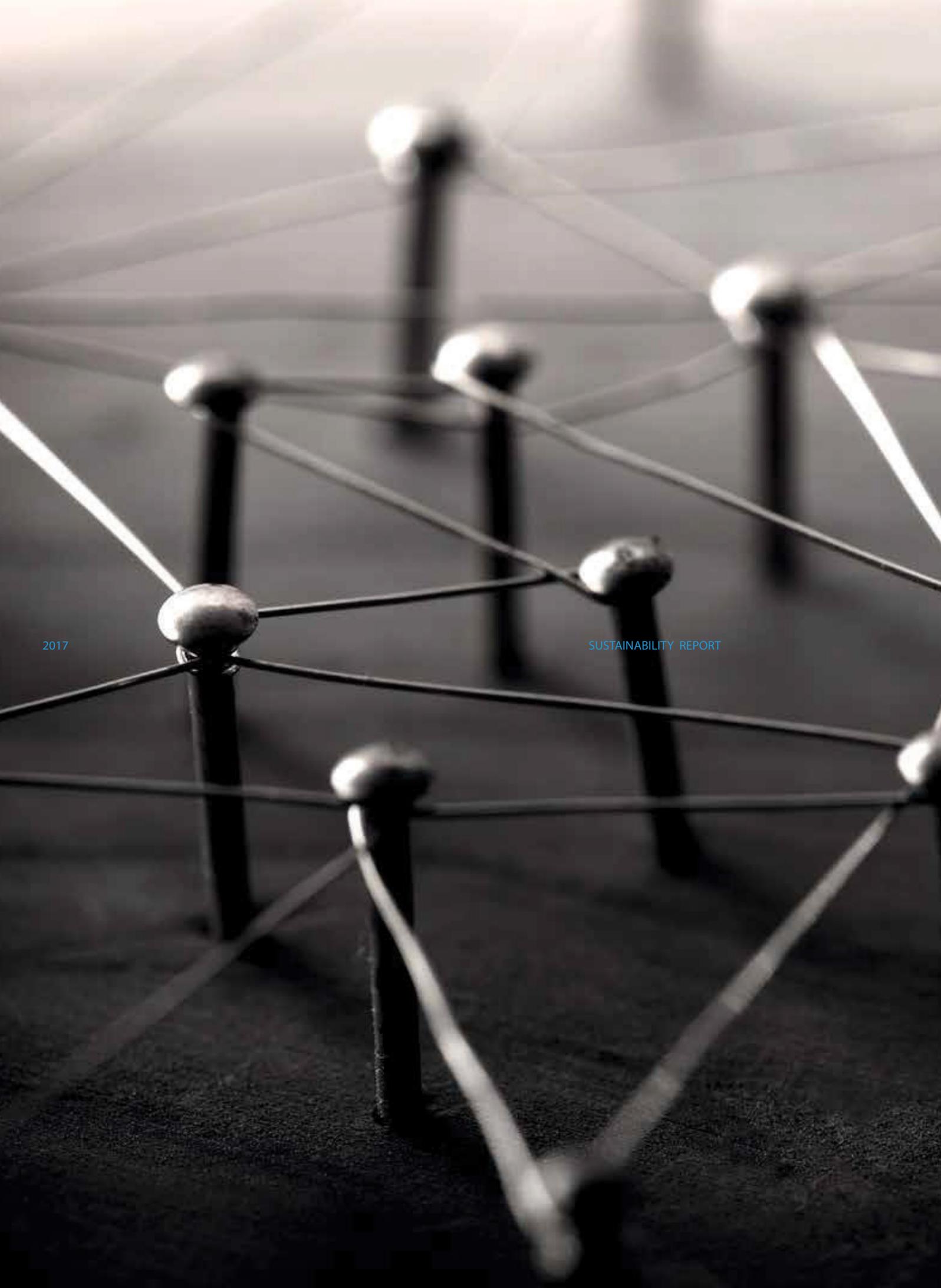
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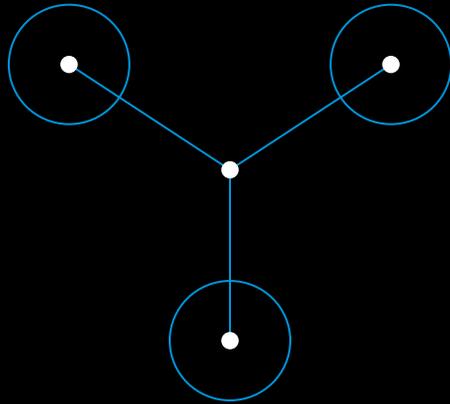
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External Assurance Report



2017

SUSTAINABILITY REPORT



2017

01

SUSTAINABILITY REPORT



thread , noun [<subsequ. feminine of adj. spun <to spin], yarn (neutral), thread*
{SYNON.}

Diminut. small thread (feminine)

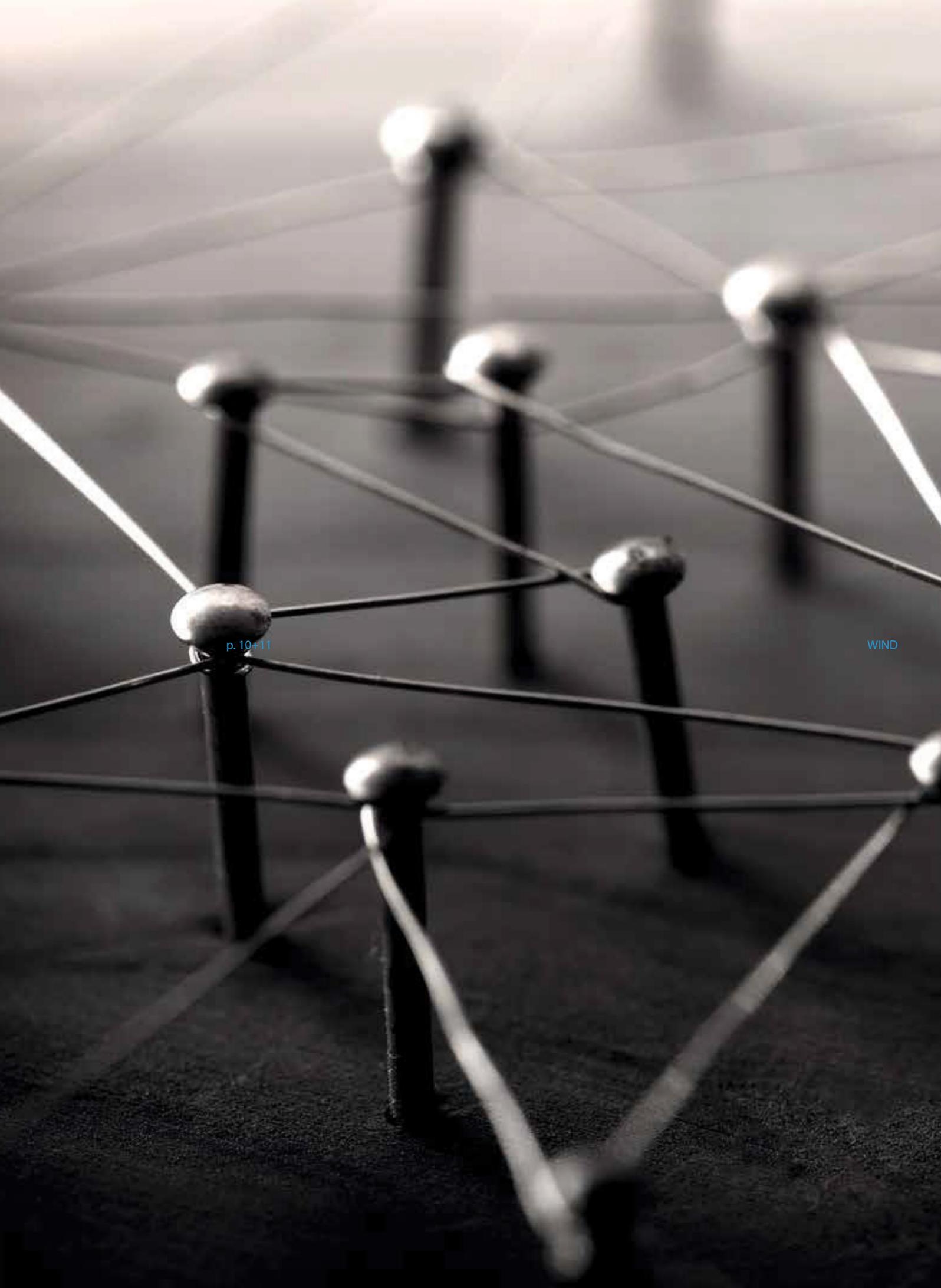
* Etymology Comment. It comes from the ancient noun fiber, which is linked to the ancient word "power"

Yet this fine thread has a special ability, a great power:
to hold everything together and connect them to a unique balance.
Likewise, we at WIND, as a strong thread, connect and are connected to our People,
Environment, Society, Customers and the Economy. We thus create a large network
that is constantly expanding and evolving to offer communication and connectivity
in the digital world everywhere throughout Greece.

This is our promise.







p. 10+11

WIND

Message from the Chairman of the Board & CEO



Dear Friends,

I feel very proud introducing the 11th consecutive Sustainability Report. In 2017, WIND was the second year of accelerated growth, a year that has, as a matter of fact, sealed our vision for a decade, that is to create a modern telecommunications provider, a Company that has nothing to be jealous of the most advanced companies of Europe.

The strong growth performance of 2017 is the culmination of a very serious 10-year effort that began in particularly difficult circumstances. Our way was not easy. We faced the deep recession of the Greek economy and industry, the financial challenges of our own Company and the intense competition from multinational players without support from external factors. With our own power.

And if today we enjoy the dynamics and prospects of our Company, we owe it not only to our strategy but also to our people's values. After all, in the long run, all organizations that are distinguished, be they families, companies, or countries, do so based on values rather than on strategies.

2017

SUSTAINABILITY REPORT

WIND employees have shown over the years that they are distinguished by three core, traditional, self-evident values that make the difference. Persistence - Integrity - Commitment to excellence.

Persistence. We work hard, passionately.

Integrity. We strive intensely to show integrity in our relationships, the relationships with our partners, our customers and all our Stakeholders.

Commitment to excellence. We choose every day to offer to our customers excellent communication and service experiences.

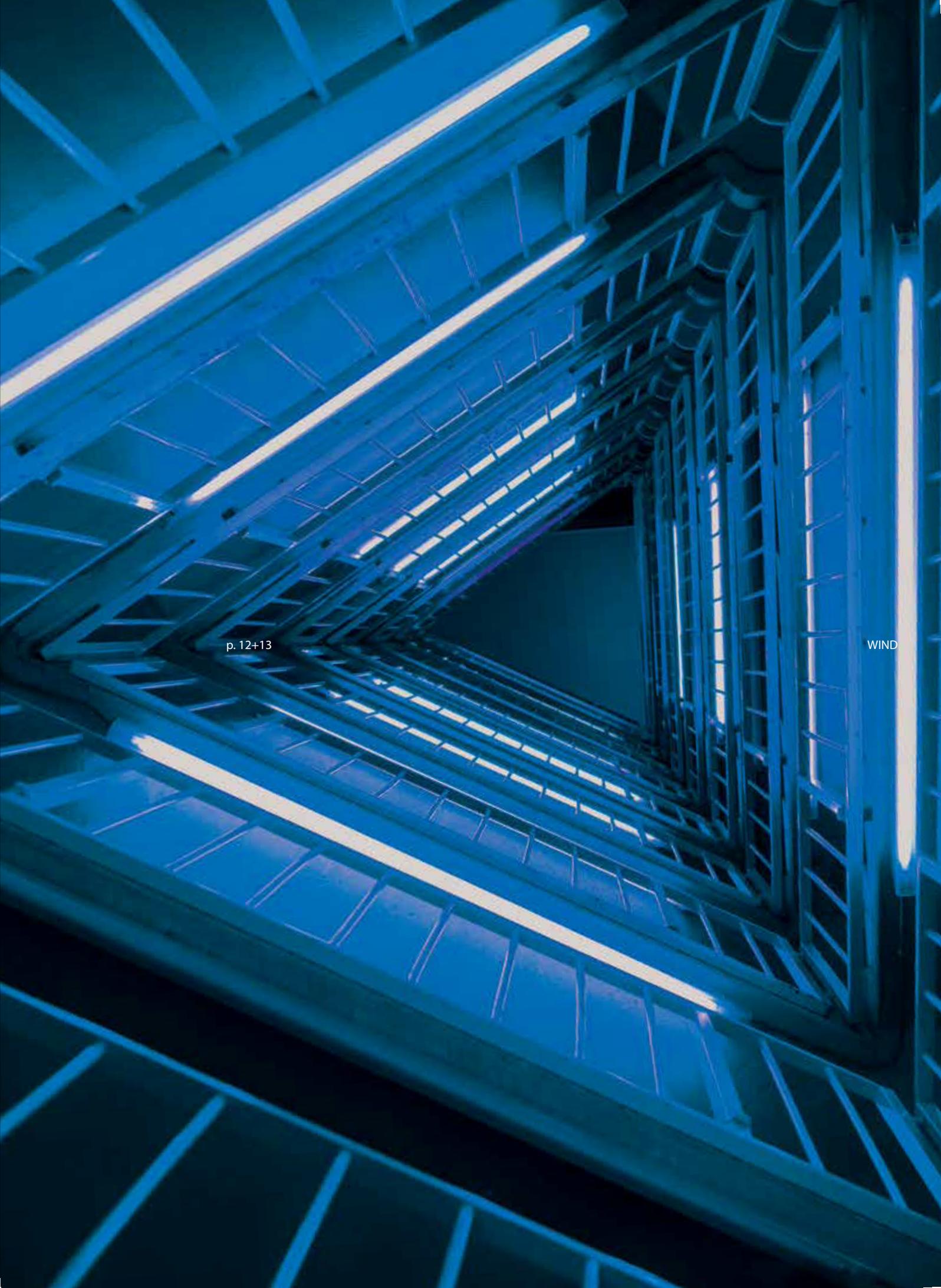
These values also form the essence of our Corporate Responsibility strategy, which unfolds with a series of actions that directly and positively affect Greek society, as WIND has to do, as one of the country's largest businesses, with a critical economic and social footprint. For these actions as well as for every aspect of our business operation you will read more in the version you have in your hands.

From my point of view, I want to tell you that I am very proud to lead a team of 1,000 people who, with their knowledge, experience, hard work and values, have made WIND another example of the unlimited capabilities of young Greek scientists and healthy Greek entrepreneurship.

WIND has been transformed in a decade. Thanks to our growth strategy, thanks to the new exciting technological developments in our market. Above all, thanks to the "heart" that is dynamically throbbing at the centre of our organization, which is the heart of our people.

We have the ability, will and the duty to all our Stakeholders to continue to grow and to positively influence the environment and the society of our fellow citizens. We are happy to renew this commitment.

Sincerely,
Nassos Zarkalis
Chairman of the Board & CEO, WIND Hellas



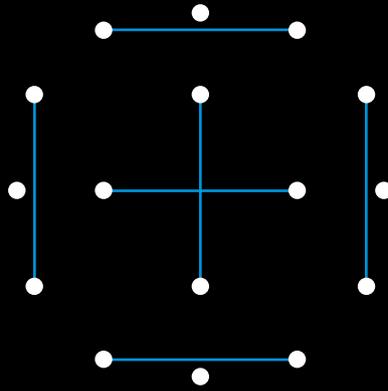
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WIND



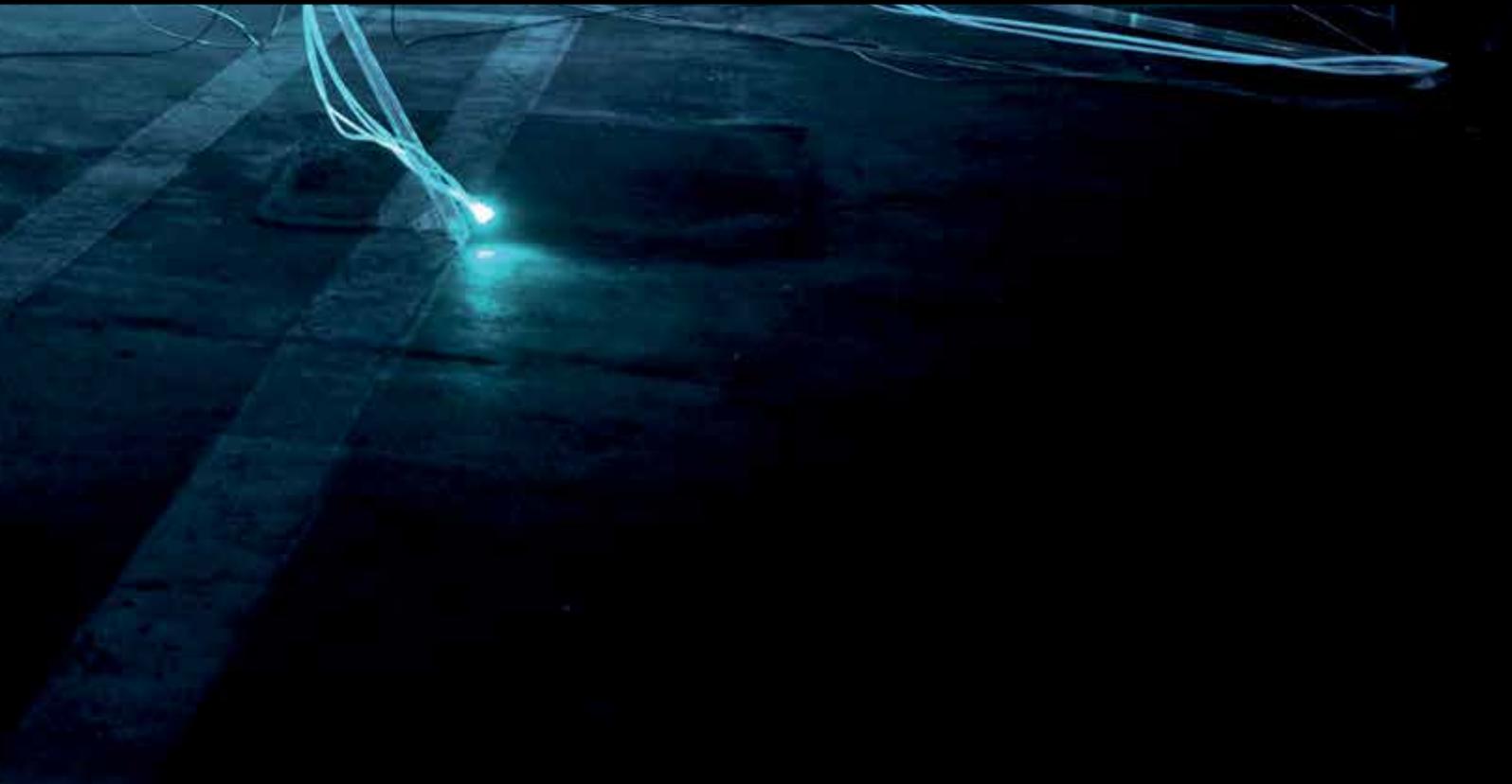
2017

SUSTAINABILITY REPORT



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WIND



WIND Hellas →
Investing in development

2017

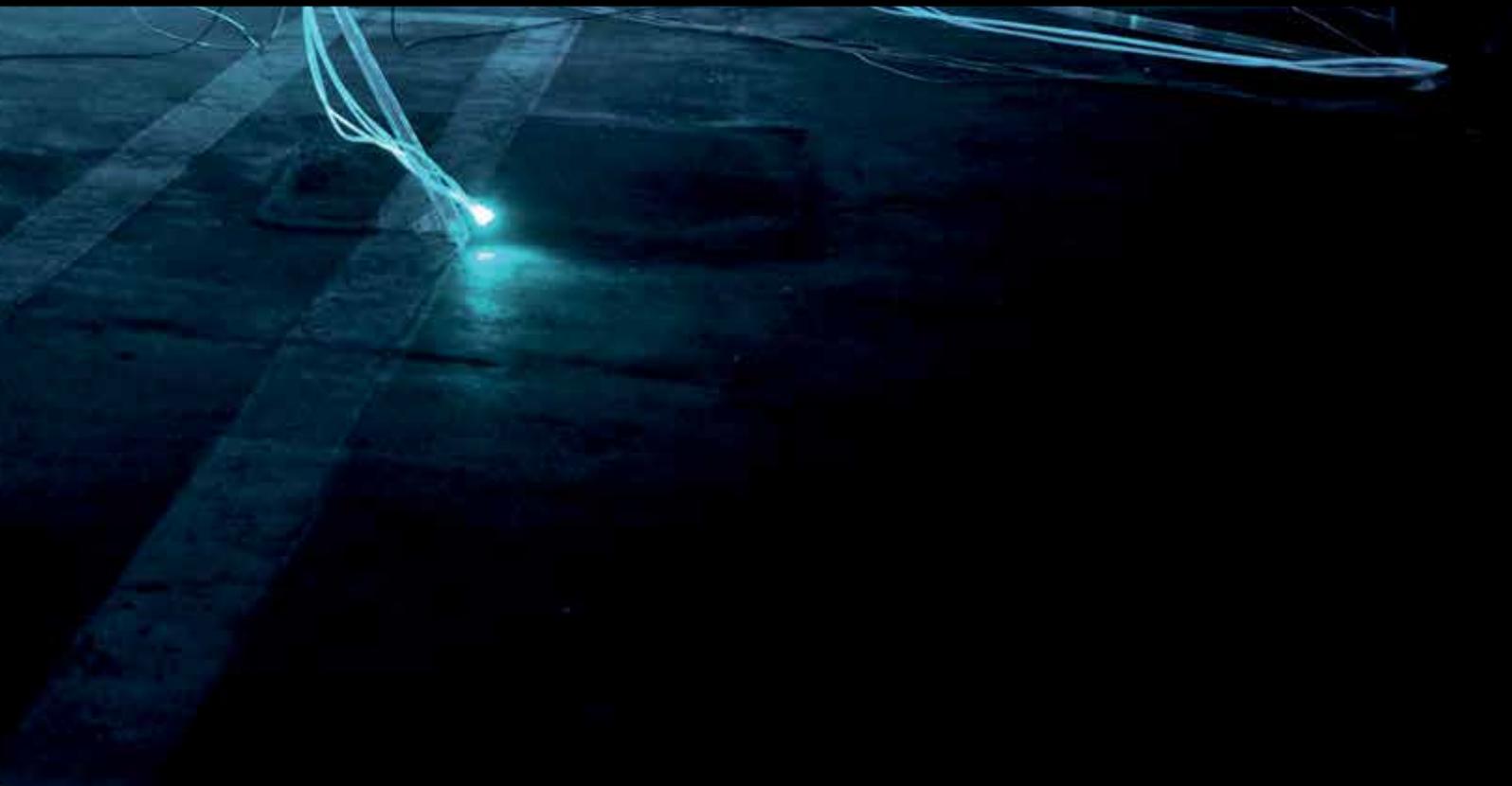
02

SUSTAINABILITY REPORT



We constantly thrive to achieve excellence in performance, investing in technology with the goal of offering integrated Mobile, Fixed Telephony & Internet services to our customers.

We believe in the power of a modern world where everything is interconnected and when you have connection you can do everything. Since our establishment, we have invested €3.057 billion to develop infrastructure, thus implementing one of the largest private investment projects in Greece.



At a glance

4,3 ^[million]



SUSCRIBERS

94.9 ^[million €]

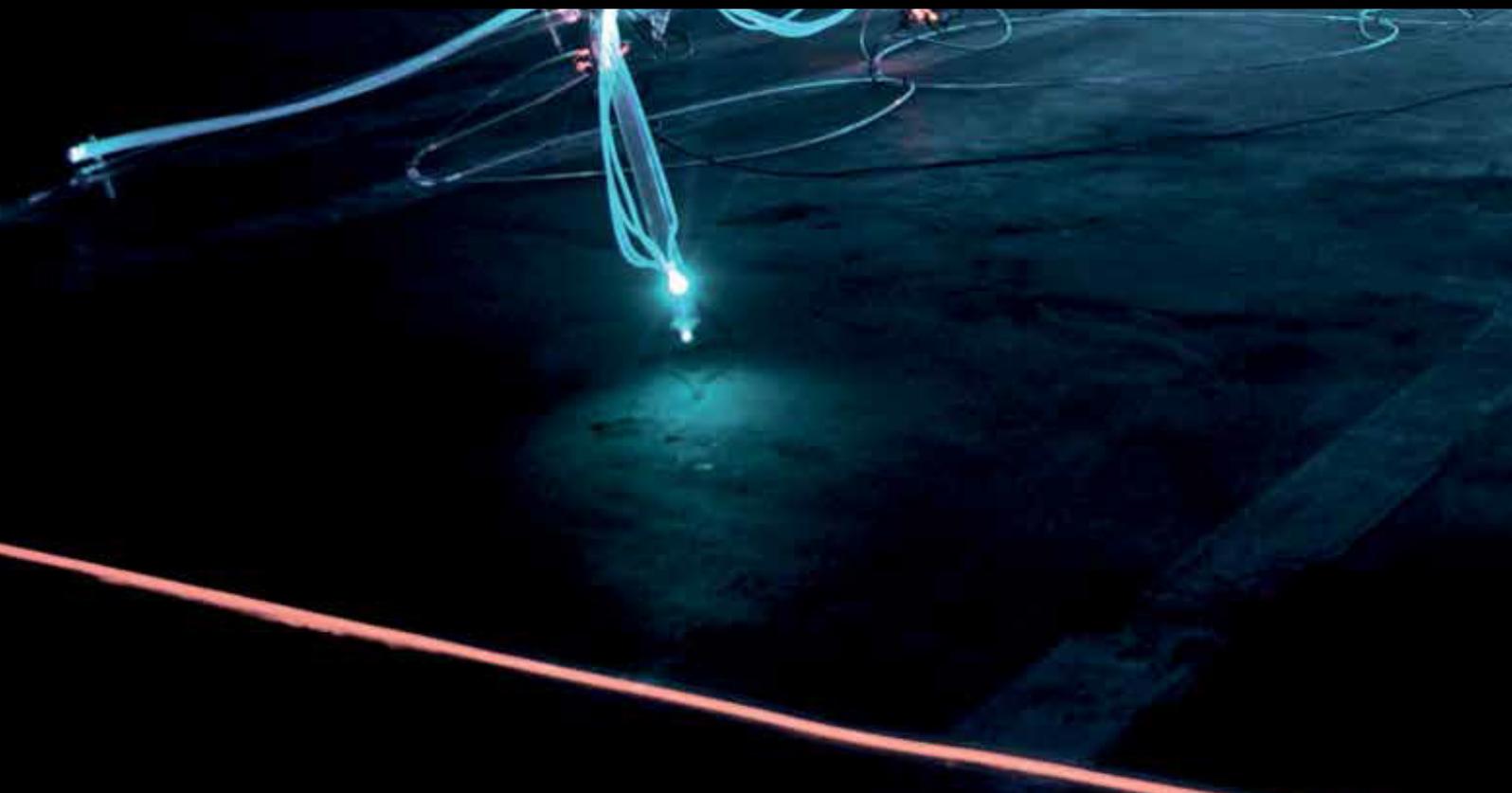


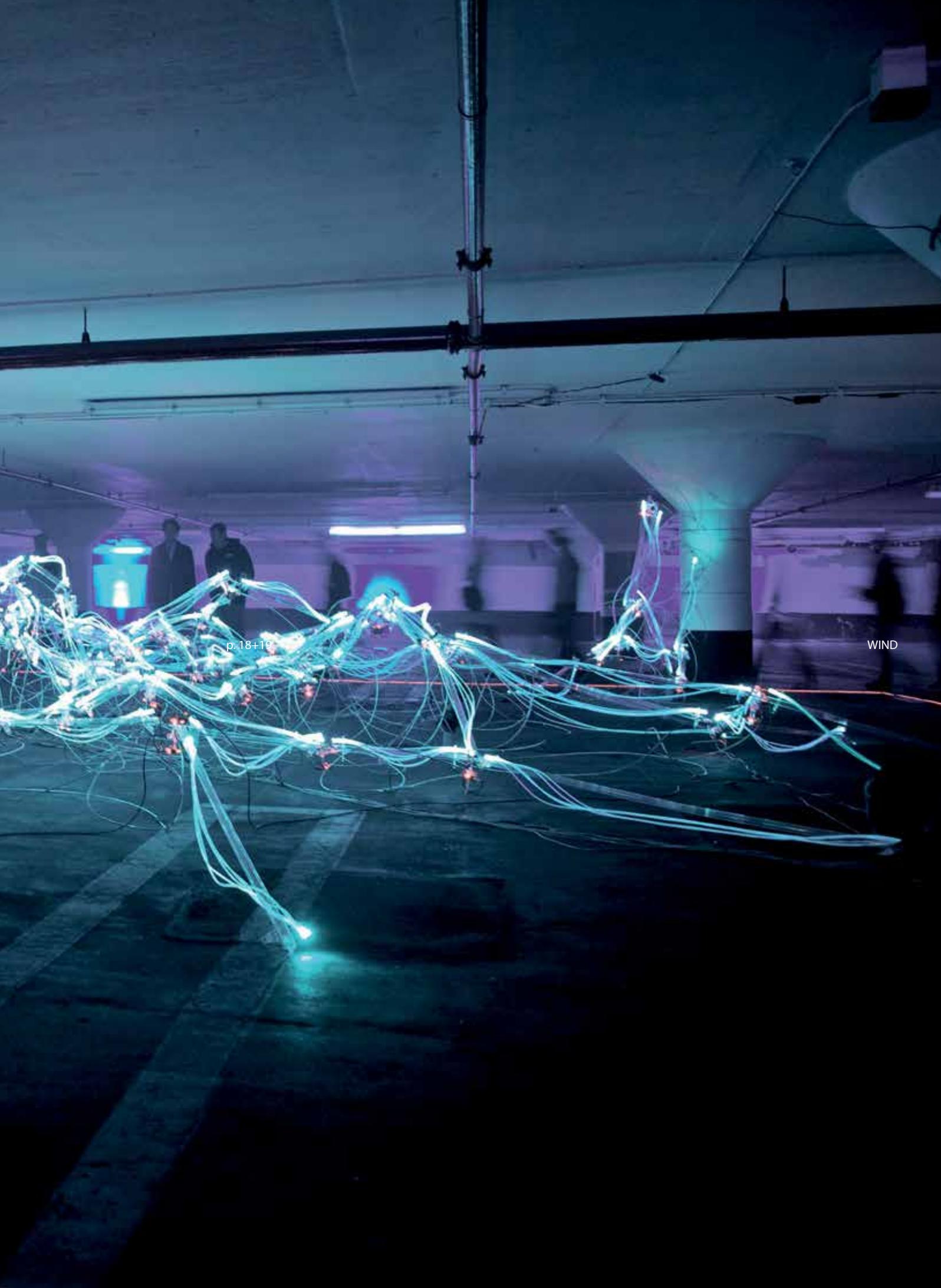
INVESTMENTS

210



STORES

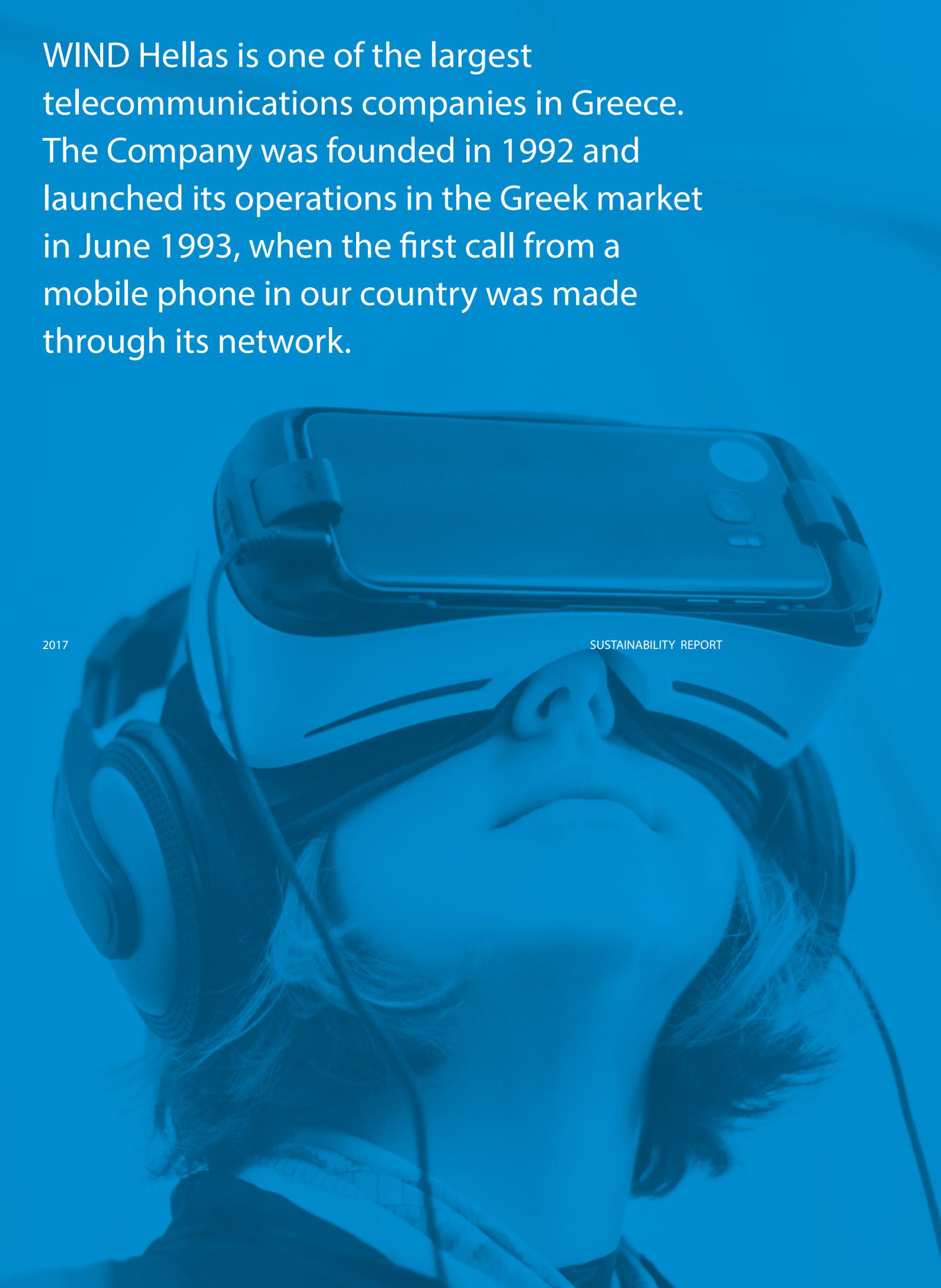




p. 18+19

WIND

WIND Hellas is one of the largest telecommunications companies in Greece. The Company was founded in 1992 and launched its operations in the Greek market in June 1993, when the first call from a mobile phone in our country was made through its network.



The Company & Landmarks

WIND Hellas is one of the largest telecommunications companies in Greece. The company was founded in 1992 and launched its operations in the Greek market in June 1993, when the first call from a mobile phone in our country was made through its network. Throughout all these years, we were established as a pioneer in mobile telephony technology and introduced innovative products that changed the status quo in the field of communications. Today WIND has more than 4.3 million mobile and fixed telephony subscribers, and is the first telecommunications company in Greece to offer integrated Mobile, Fixed Telephony & Internet services to its customers. Flexibility, reliability and simplicity characterize the architecture of its integrated network, offering coverage approaching 100% in mobile telephony and 77,5% of installed telephone lines across the country, for fixed telephony and broadband Internet. In its many years of operation, WIND Hellas has evolved from a mobile telephony Company to an integrated telecommunications provider creating an equally strong Fixed Telephony & Internet business unit with extended privately-owned facilities across Greece.

WIND Hellas operates in Greece.

[p. 20+21](#)

[WIND](#)

2017...

→ It was the second consecutive year of strong performance for WIND, as it achieved an increased turnover and operating profit, closing the year with a total revenue of € 494.1 million and adjusted EBITDA of € 103.4 million, increased annually by 3.9 % and 13.6% respectively.

In mobile telephony, WIND showed an increase in the number of active smartphone users over the previous year. That trend contributed to the doubling of data traffic from year to year, while 55% of data traffic in 2017 was through the 4G network.

At the end of 2017, 4G coverage reached 87.1% aimed at reaching 95% by the end of 2018 thanks to the Company's continued investment in networks and infrastructure.

In fixed telephony, WIND continued to increase its market share by adding 33,000 new LLUs and NGAs customers. The total LLU and NGA subscriber base increased by 6% over the previous year to 592 thousand. Similarly, the number of customers, individuals and businesses, enjoying convergence services from WIND (Mobile, Fixed Telephony & Internet) reached 219 thousand at the end of 2017, recording an increase of 4.6%.

→ In November 2017, WIND's privately owned fiber optic network was officially launched, delivering high-speed connectivity at both retail and wholesale levels. The fiber optic network is expanding at an intensive pace and aims to reach 500,000 lines by the end of 2019, based on EETT's assignment plan.

Products & Services

At WIND Hellas, we offer mobile and fixed telephony and broadband Internet services.

Our basic products in 2017 were:

Individuals

Mobile & Fixed Telephony bundles

- WIND triple play

Mobile Plans - Contract

- W
- W PLUS
- W WEB
- Prepaid telephony

Prepaid plans

- F2G
- Q

Fixed Telephony & Internet plans

Until 11/2017:

- WIND Double Play
- WIND Broadband
- WIND Telephony
- SIMPLEfi
- WIND VDSL

From 11/2017, a new fixed telephony portfolio by introducing

WIND Fiber products for speeds of 100 and 200 Mbps

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

WIND Mobile Broadband

- WIND Mobile Broadband Control (contract)
- WIND Mobile Broadband (prepaid)

Businesses

Mobile Plans - Contract

- W Business
- XS Business
- Business to ALL
- Business Control
- Business MBB Control

Mobile Fleet Management Plans

- Mobile Fleet Management

Freeze Alert Plans

- WIND Freeze Alert

Customer relationship and promotion management Plans

- WIND Marketapp

Corporate Fixed Telephony Plans

Until 11/2017:

- Business Double Play Basic
- Business Telephony
- Business AddOn
- SIMPLEi 1 & 2
- Business Telephony Solutions
- Business Internet Solutions
- Business Connect

From 11/2017, in addition to the corporate fixed telephony portfolio by introducing WIND Business Fiber products for 50, 100 and 200 Mbps

- Business Double Play 50
- Business Fiber 100
- Business Fiber 200

2016
— 17

Creating Value

Financial Growth & Feature Figures

During its course, WIND Hellas was one of the largest private investors in Greece, as it realised investments amounting to € 3.057 billion in technological infrastructure, thus creating tangible and intangible value for the economy and the country. WIND Hellas is totally owned by Crystal Almond Limited holding company, which is its parent company. Shareholders of Crystal Almond Limited are investment capital companies, of the largest investment funds worldwide. By investing in WIND Hellas they demonstrated their faith in the Company's development prospects, as well as in the ability of the Greek economy to recover.

The domestic value chain created every time a consumer selects our products and services, brings revenue to the Greek state, income to Greek households and supports thousands of jobs with a direct positive impact on greater society. WIND Hellas operates in Greece.

Participation in third companies

Victus Networks S.A.

In 2013 WIND Hellas signed a strategic agreement with Vodafone Greece, in order for the two companies to develop a partially common network of mobile telephony base stations across Greece, with particular emphasis on the regions and densely populated urban areas. The aim of this cooperation is, through the shared infrastructure, all Greeks to enjoy mobile broadband services. This large project has been undertaken by the new company Victus Networks, in which WIND Hellas and Vodafone Greece participate at a percentage of 50% each. Victus Networks launched its operations in 2014.

Forthnet S.A.

Since July 2013, WIND Hellas owns 33% of the shares of Forthnet SA.

p. 22+23

WIND

	2016	2017
Turnover	483,8 million €	494,1 million €
Investments	92,9 million €	94,9 million €
Insurance contributions	7,1 million €	7,4 million €
Total financial liabilities	239,4 million €	347,2 million €
Total equity	338,7 million €	281,9 million €
Total assets	899,9 million €	958,4 million €
Mobile and Fixed Telephony customers	3,7 million	4,3 million
Number of stores at the end of the period	214	210
Employees (FTEs)	982	1.010
Employees (Heads)	987	1.015

* The financial data presented in the Table for 2016 & 2017 are based on the Annual Consolidated Financial Statements of Crystal Almond Intermediary Holdings Limited 2017.

Participation

WIND's participation in associations and international / national organizations and committees contributes to the industry's progress through the exchange of expertise, as well as the Sustainable Development issues while supporting entrepreneurship.

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

Professional bodies

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

Bodies for sustainable development

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



p. 24+25

WIND

Distinctions

2017 was yet another year for exceptional distinctions for our Company and its people. We were distinguished in many sectors, such as customer service, maximum utilization of the digital environment and social network media, the 360o WIND Sales Development & Training Program, as well as for our integrated strategic approach in Responsible Entrepreneurship.

• European Excellence Awards in Public Affairs

A remote island in the heart of the Aegean Sea has become synonymous with the incredibly improved 4G experience of the WIND Network through its telecommunication adoption project. This was the “Secret of Anafi”. The European Excellence Awards in Public Affairs in 2017 highlighted this effort as Europe’s leading technology leader, confirming the value of equal access for all Greeks to communication as a point of reference for responsible development for all of us, the employees of WIND .

• CR Index National Corporate Responsibility Index

WIND won a PLATINUM distinction in the National Corporate Responsibility Index (CR Index) 2017 for the implementation of responsible corporate practices, with a benchmark of 100 rigorous international criteria, in which every year 6,000 companies from 64 countries are evaluated. A major reward that proves that for all of us in WIND, Corporate Responsibility is not a “luxury” but part of our business strategy and DNA, with respect for our Society, our Environment, our Market and our Employees.

2017

SUSTAINABILITY REPORT

• National Customer Service Awards 2017

WIND has won two awards by the Hellenic Customer Service Institute as part of the National Customer Service Awards 2017. The Company was first named “Exceptions and Service Recovery”, while Margarita Gerontopoulou, Customer Experience Senior Manager, was named Professional of the Year for 2017. The awards have highlighted the consistency and dedication shown by all of our Company’s employees on a daily basis.

• Sales Excellence Awards

With 5 awards, 1 gold, 3 silver and 1 bronze, WIND was distinguished at the Sales Excellence Awards ceremony held for the fifth consecutive year by the Greek Sales Institute and Boussias Communications. WIND’s 360° Sales Development and Training Program was distinguished for its multi-level and holistic character by winning the GOLD Prize for WIND Employees. The nominees were rated by a jury from field professionals, university professors and representatives of the Greek Sales Institute with many years of professional/research experience in the field of sales.

• Digital Media Awards

WIND won five awards in the Digital Media Awards ceremony in recognition and for rewarding best practices in the Digital Publications sector in Greece. Specifically, the Company has received 2 Gold awards in the Best Use of YouTube and Best Content Marketing categories for the Jeremy_Greecing campaign powered by WIND campaign, 1 Silver award in the Best Social Media Marketing category for its dynamic presence in 7 social media and 1 Bronze award in the Best e-newsletter category for WIND Email Marketing. Lastly, the jury awarded the WIND Digital Services team a Platinum award for the Company’s collaboration with the popular YouTuber Jeremy as it scored the highest rating in the Digital Communication & Marketing category.



CR Index - National Corporate Responsibility Index



European Excellence Awards in Public Affairs

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WIND



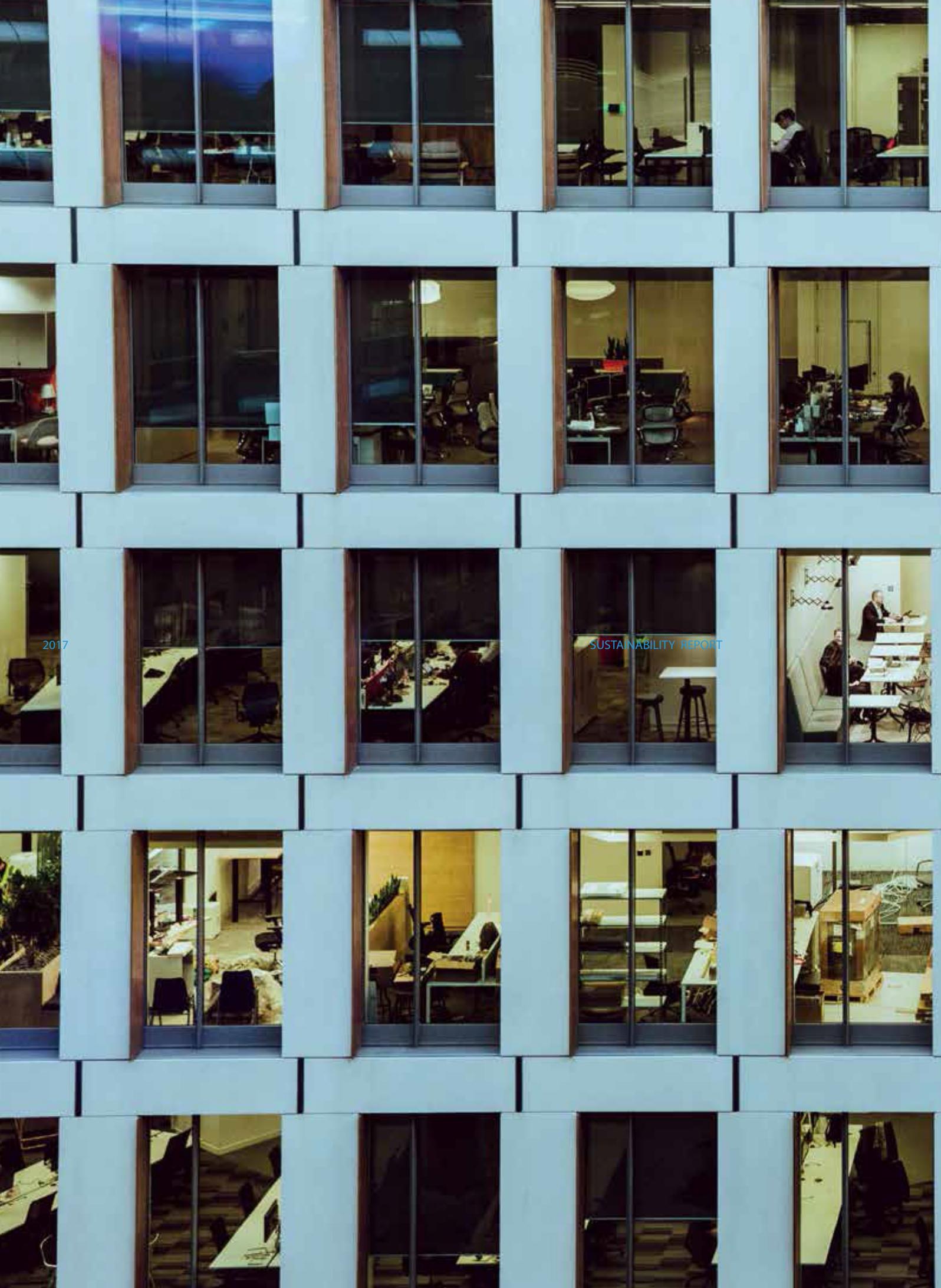
National Customer Service Awards 2017 - Professional of the year, M. Gerontopoulou



Sales Excellence Awards

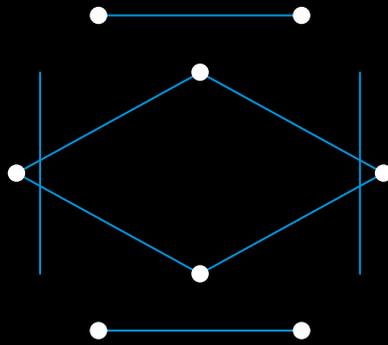


Digital Media Awards



2017

SUSTAINABILITY REPORT



CORPORATE RESPONSIBILITY →
We do business responsibly

2017

SUSTAINABILITY REPORT

03



We always do the right thing, regardless of cost, with integrity and fairness for all. Our constant goal is to create value for all our stakeholders by establishing the Principles of Responsible Business part of our entire business practice, from our products and customer service to the more focused actions of Corporate Responsibility



At a glance

20



COMMITMENTS FOR 2020. OUR STRATEGY FOR CORPORATE RESPONSIBILITY.

17



UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS ARE CONNECTED DIRECTLY OR INDIRECTLY WITH OUR BUSINESS OPERATIONS.





p. 32+33

WIND

Our Approach

At WIND Hellas we always operate guided by the philosophy of sustainable business practice, building our company's prosperity with the view to the long term horizon and by investing in the future.

We believe that Corporate Responsibility is not a "luxury"; it is part of our business strategy that takes into account society and assesses opportunities, as well as the risks that may exist in our industry. We support society with resources as well as with actions of a multifaceted nature; thus contributing to the increase in the living standard and inclusiveness. This strategy is a positive reflection on our Company's reputation and image and creates relationships of mutual understanding with our Stakeholders, supporting the fulfillment of our corporate objectives.





Our new strategy “20 Commitments for 2020”

Times are changing and strategies are changing too. For a number of years, WIND has successfully implemented the Corporate Social Responsibility Strategy “IN ACTION”. Goal setting has been a priority for WIND Hellas since we have begun to regard corporate responsibility as a valuable tool of key importance for the Company’s development and for our relationship with the Greek society, our customers and other Stakeholders. Throughout these years, our primary concern has been the continuous improvement of our impact on employees, society and the environment with focused operations and actions.

The development of that long-lasting course is our new “20 Commitments for 2020” Strategy. This strategy consists of 20 commitments for 2020 as part of our long-term commitment to sustainable development and improvement, as well as our commitment to the United Nations Sustainable Development Goals for 2030.

These 20 commitments address our most important issues, as recognized by our communication with our Stakeholders and the continuous monitoring and recording of our performance.

These 20 commitments create multifaceted benefits for all our Stakeholders, as well as for the wider human and natural environment. We are committed towards our employees to continuous improvement, to their well-being and to ensuring a balance between their professional and personal lives, to safeguarding diversity and enhancing employability through their continued education and development.

In the environment, we are strengthening our commitments to reducing our environmental footprint by reducing our emissions and energy consumption, reducing waste to landfills and creating our first climate neutral store. In society, we are committed to strengthening our two major programs, kids@safety, for the safe use of new technologies by children and “WE COME CLOSER” for the digital transformation of 3 destinations every year.

[p. 34+35](#)

WIND

Lastly, we commit ourselves to our partners and customers to continuously increase their satisfaction, strengthen the domestic market by using local suppliers and constantly informing our customers about our 20 commitments for 2020 and the benefits resulting from our new strategy for the purpose of maximizing our contribution to the Greek society and economy.

The 20 goals for 2020 are presented in detail on pages 36-37 of the Report.

By taking into account the risks and opportunities that emerge, we aim to apply our responsibility policy to our business activity, our employees, the environment and society.

So, we are focusing on:

Society

We support Organizations and Bodies which, through their work, contribute to the protection of the environment and to the support of people and mainly children in need.

Our People

We care for well-being, while also informing and mobilizing our employees, urging them to work as volunteers and become engaged citizens.

Market

We offer responsible products and services, with the purpose of meeting important social needs nationwide, such as the need to communicate.

Environment

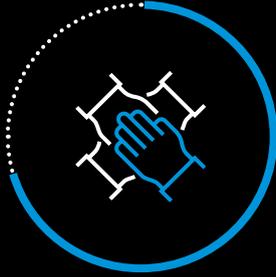
We minimize our environmental impact that may result from our business activity, with the emphasis on reducing the consumption of electricity, recycling materials and developing our network infrastructure in an environmentally friendly manner.

01



Annual
Employee Survey
≥88% participation

02



Employee
Commitment
≥70%

03



"euWIND"
program ≥80%
participation

04



Flexible schedule of
≥80% employees

05

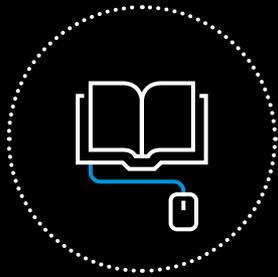


Women in
Managerial
Positions 20%

2017

SUSTAINABILITY REPORT

06



Skills training
30 hours
per employee
annually

07



Sustainable
Development
education 100%
employees

08



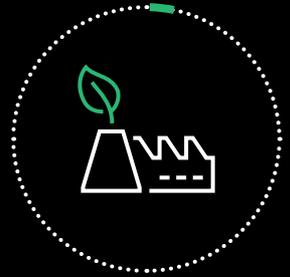
Energy Checks
100% of the
facilities

09



WIND Digital Services
15% increase in
subscribers

10



Energy Efficiency
5% increase in
building facilities

11



Recycling of waste
80% increase in collection points in offices

12



Climate Neutral
WIND store
CERTIFICATION

13



Information action
kids@safety
20% increase in penetration to children & parents

14



Program
"WE COME CLOSER"
3 new destinations each year

15



Customer Satisfaction Index (CSAT) **≥80%**

p. 36+37

WIND

16



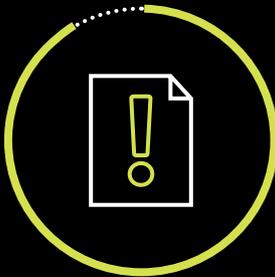
Overdue Receivables Management Program **50%** consistency & **90%** Customer Satisfaction Index

17



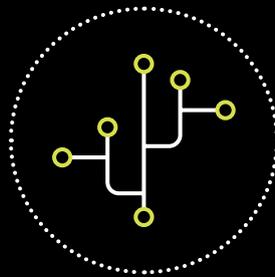
Costs to Domestic Suppliers **≥90%** of the total

18



National Corporate Responsibility Index (CR Index) **95%** performance - DIAMOND

19



Optical Fiber Network **500,000** fiber lines

20



Continuous Consumer Information for **20 Commitments** and our annual progress

We promote the Sustainable Development Goals

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

We believe that our growth is built on an integrated approach where business needs are aligned with social needs. We aim at specific priorities, within our industry's mandates, so as to achieve significant results, and always striving to contribute to the quality of life of future parents:

Specifically, the association and practical adoption of the UN Sustainable Development Goals with our programs and actions in the context of our new Corporate Responsibility strategy is presented in detail in the related Table on pages 163-165.

2017

SUSTAINABILITY REPORT

Governance Structure of our Corporate Responsibility

For a Corporate Responsibility strategy to be able to create firm benefits for all parties, it must be a long term commitment for a company and to be supported by the senior management. More than the available resources, what is crucial for a successful Corporate Responsibility strategy is the commitment of the organization's people to the Corporate Responsibility values.

Only then will the Corporate Responsibility strategy become part of the business and drive all aspects of a company, from its products to customer service and the more focused Corporate Responsibility actions.

Our long term commitment to Sustainable Development is demonstrated in our internal environment, through the actions we develop, the goals we set and assessing our results on an annual basis.



CORPORATE RESPONSIBILITY GOVERNANCE STRUCTURE

FIGURE 1.



Our Stakeholders

We are a business organization that constantly communicates with our stakeholders, which are determined based on their impact to our business operations. We have developed a specific approach for precisely mapping them, as well as our relationship with them. Our stakeholder either belong to the internal environment of the Organization (Shareholders, Employees, Commercial Network), or exist and act in the external environment, in Greece and/or internationally (Regulatory Authorities, Media, Local Government, Suppliers, Partners, Customers, Central Government, Academic Society, NGOs).

Dialogue with Stakeholders

The continuous two-way communication with our stakeholders is the focus of our operations. We work closely with different stakeholder groups and provide ongoing update about our business operations, while we receive opinions, questions and positions, which we take seriously into account. On a regular basis, the Corporate Responsibility department prioritizes the important issues for our Company and afterwards, proceeds to the development of the dialogue plan with our stakeholders. The continuous dialogue raises issues and forms proposals which then become actions, with which the Company attempts to respond to the opportunities and challenges that emerge.

2017

SUSTAINABILITY REPORT

DIALOGUE DEVELOPMENT TABLE WITH OUR STAKEHOLDERS 2017

TABLE 3.1

Stakeholders	Two-way Communication	Priorities - Dialogue Issues	EXTERNAL ENVIRONMENT
Regulatory Authorities	Participation in consultations (1) Participation in studies (1) Participation in conferences (1)	Network Infrastructure & Investments Regulatory Obligations Quality of Services & Service Market - Competition Business Continuity Issues	
NGOs / Citizen Organizations	Partnerships (4) Support (1) Meetings (2)	Education & Volunteerism Health & Safety Environment Social Contribution	
Central Government / Local Government	Meetings (5) Participation in local conferences / workshops (3)	Safe use of the Internet E/M Radiation Economic Development Environment Investments in Technology & Infrastructure Supporting the Local Economy, Society, Cultural and Educational Institutions	

	Stakeholders	Two-way Communication	Priorities - Dialogue Issues
EXTERNAL ENVIRONMENT	Customers (Individuals - Businesses)	Customer Satisfaction Surveys (2) Focus Groups (2) Customer Service Center (1) Online Communication (1) Corporate Image Surveys (3) Complaint Telephone Line (1)	Technical Issues for Products & Services Communication Coverage Quality of Services Telecommunications Charges E/M Radiation
	Academic Community	Support to Scientific Programs (2) Educational Seminars (5) Information Days (5)	E/M Radiation Safe use of the Mobile Phone and the Internet Education Innovation Health & Safety
	Media	Press Conferences (2) Media Trips (4) Field Trips (3) Meetings (1) Press Releases and Presentations (1)	Management Financial & Commercial Results Regulatory Issues Quality of Services and Network Coverage Infrastructure, Technology & Innovation Social Contribution Environmental Operations
INTERNAL ENVIRONMENT	Suppliers	Working visits (4) Participation in Industry Associations (5) Ongoing Information and Support (1)	Procedural Matters Financial Matters Timely Delivery Safe delivery conditions for employees
	p. 40+41	Scheduled Shareholder Meetings (5) Targeted Communication (2)	Financial Growth / Results Management Investment Plan Strategic Choices Socioeconomic Developments
	Employees	Employee Opinion Surveys (4) WIND News (1) Intranet (1) Organization of Events (2) Meetings with Employees Union (1)	Education Health & Safety Equal Opportunities for Professional Development
	Commercial Network	Extranet (Communication Systems) (1) Business Conferences (3) Meetings with Sales Managers (2) Ongoing Information and Support (1)	SUSTAINABILITY Sharing Knowledge and Best Practices Initiatives to Support Local Society Needs Training in New Products & Services Customer Service Recycling, Objectives and Ecological Awareness

We Approach Important Issues Responsibly

Materiality Analysis

At WIND Hellas, in 2016, we continued to analyze the key issues concerning the Company having a greatest impact on our Stakeholders.

The methodology we used to identify key topics was completed in three stages:

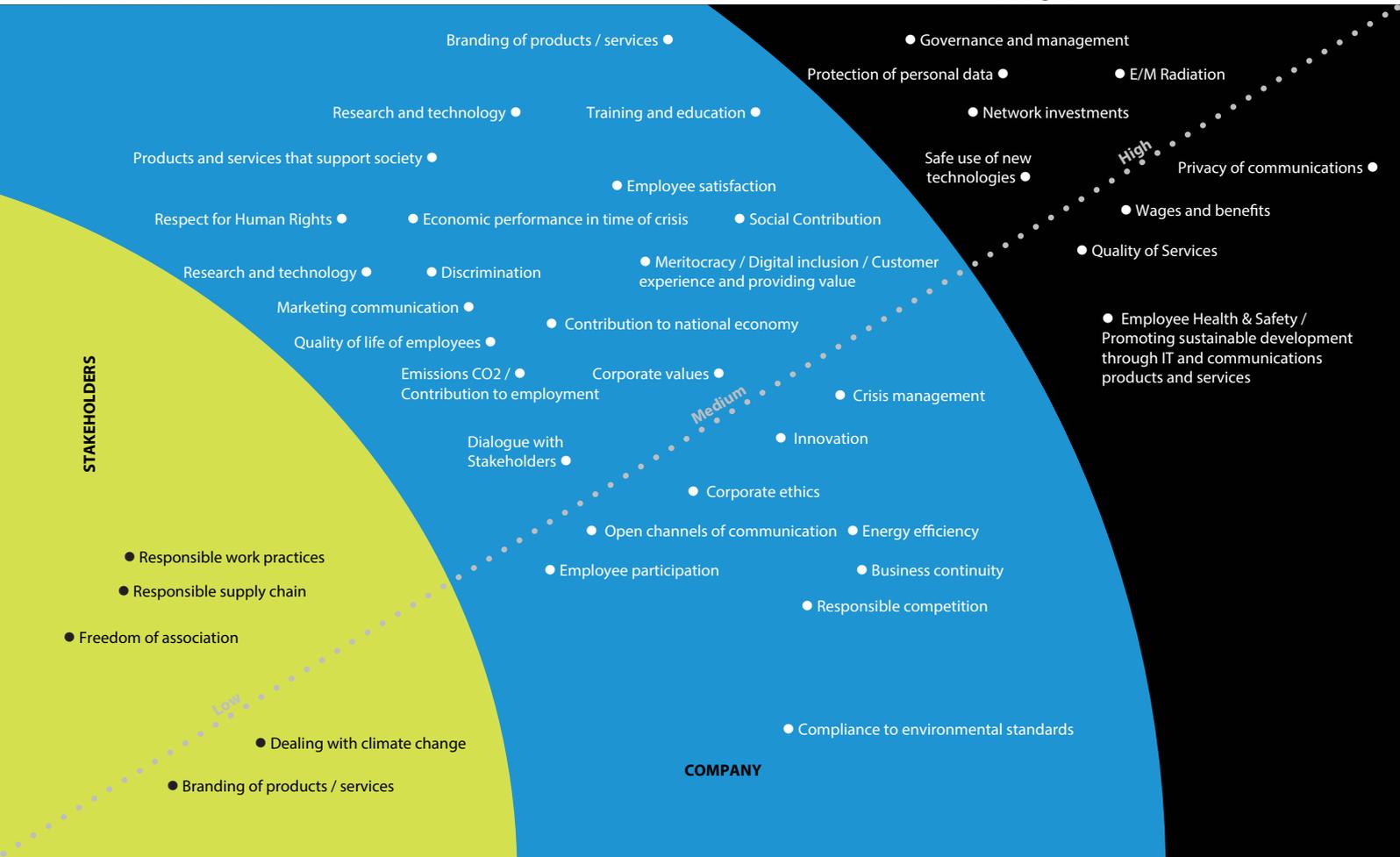
The first stage involved identifying the important issues concerning the Company and the telecommunications sector, through desk research and studying reports of similar companies both in Greece and internationally. Next, we conducted a series of interviews with executives of the Company and meetings with management executives in order to prioritize the issues based on the Company's targets and their importance for the internal and external matters. Finally, we held a structured workshop involving dialogue between representatives of our Stakeholders, during which there was discussion and prioritization of issues that had the greatest impact to these groups based on their perception.

The key sustainability issues emerged through combining the approach of the results of the internal and external materiality analysis, as well as the prioritization of the issues based on the corporate objectives and the corporate responsibility objectives which were set by management in 2016 and were confirmed anew in 2017.

Here are some of the materiality key issues that have a significant impact on WIND and its Stakeholders in direct relation to the United Nations Sustainable Development Goals.

MATERIALITY MATRIX

TABLE 3.1



We Promote Responsible Entrepreneurship & Technological Innovation

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

Thus, in 2017, our participation included:

- 19th Infocom World Conference - Leaders' Summit - Nassos Zarkalis, Chairman & CEO.
- 21st Round Table Discussion with the Greek Government | Economist Events - Antonis Tzortzakakis, General Manager of Fixed Telephony & Corporate Customers.
- Broadband World Forum 2017 - Global Operators Discuss 2020 Goals | Berlin - Antonis Tzortzakakis, General Manager of Fixed Telephony & Corporate Customers.
- Corporate Responsibility in Practice, IV | 4th Panorama of CSR Actions in Greece - Giorgos Tsaprounis, Senior Director of Corporate Affairs.
- The Economist Third Agricultural Business Summit - George Stamatis, Head of Business Mobile Marketing.

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WIND

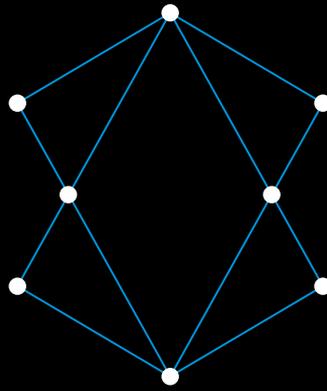
Materiality Key Issues

- Protection of personal data
- E/M Radiation
- Privacy of communications
- Network investments
- Wages and benefits
- Governance and management
- Safe use of new technologies
- Quality of Services
- Employee Health & Safety
- Promoting sustainable development through IT and communications products and services



SUSTAINABILITY REPORT

2017



SUSTAINABILITY →
We do business responsibly

2017

04

SUSTAINABILITY REPORT



We put aside anything unnecessary and focus on what is important. We base our operations on values, policies and codes that cement our commitment to Responsible Entrepreneurship, as part of our daily conduct, with the goal of improving our offered services to our Stakeholders.



At a glance

201



AND MORE FUNCTIONS ASSESSED IN THE RISK ASSESSMENT PROCESS.

96



RECOMMENDATIONS OF THE INTERNAL AUDIT DIVISION WERE IMPLEMENTED AFTER COMPLETION OF THE INTERNAL AUDIT PROGRAM.

2



TRAINING CONFERENCES TO NEW EMPLOYEES AS PART OF THEIR INCLUSION IN THE COMPANY ON THE CODE OF CONDUCT.

□



COMPLIANCE FRAMEWORK POLICY.





p. 48+49

WIND

Our Approach

Being faithful to our commitment for Responsible Entrepreneurship, we proceeded in 2017 in carefully planning our actions, through responsible practices, audits and evaluation of our daily operations. We adopted new policies and practices in order to simplify our procedures and respond more efficiently to our customers.



Responsible Management

WIND Hellas is a Company with Vision and clear Mission. Recognizing the fact that the telecommunications industry plays an important role in everyone's life, WIND supports its operations on its business Values and has established and implements policies that demonstrate its commitment to Responsible Entrepreneurship.

Our commitment is to make WIND Hellas one of the best independent telecom companies in Europe, offering to our customers high quality services at the best price.

Our corporate values support the implementation of our commitment, taking also into account the wishes of our employees for a better work environment.

2017 SUSTAINABILITY REPORT

- Integrity** → I always do the right thing, regardless of cost, with integrity and fairness for all.
- Simplicity** → I put aside anything unnecessary and keep the essence of everything I do.
- Flexibility** → I adapt quickly and effectively to the challenges of the market.
- Entrepreneurship** → I constantly seek to achieve excellent performance in my work. I take the responsibility and I am proud of it.
- Teamwork** → I actively and positively support my team. I help so that everyone's potentials are highlighted and exploited.

Our Policies

Through the implementation of our Policies, we aim to provide quality products and services to our customers, to protect their personal data and privacy of communications and to protect the environment. Our Policies are posted in the workplace and stores of our Company. They are also available to every employee electronically (WIND Intranet, WIND extranet). Lastly, they are also available to the public through our official website: www.wind.gr.

Quality Policy

We describe the Commitment and Values of the Company, which are applied throughout its operations.

Environmental Policy

We describe the commitment of the Company relating to the protection of the environment and the steps it takes in this direction.

Data Security Policy for the Protection of Privacy of Communications

Pursuant to the current regulatory framework and upon approval of the Authority of Communication Security and Privacy, we apply internally and impose to our contractual relationships with third parties the Security Policy for the Protection of Confidentiality of Communications, the object of which is to protect the communication data and the communication information systems against potential risks to ensure the privacy of communications.

Business Continuity Management Policy

We describe our commitment in relation to our ability to be able to continue all our critical operations and to provide uninterrupted to our customers the critical services, in case of an event which could negatively impact important business units, systems, and services.

Work Health & Safety Policy

It describes our commitment to ensure the health and safety of our employees, recognizing that this is an important pillar of our responsible functioning in all our activities.

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[WIND](#)

Management Practices

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

Board of Directors

The management and representation of the Company and the management of its assets falls under the authority of the Board of Directors, which may consist of three (3) to fifteen (15) members. The current Board of Directors (BoD) of the Company consists of the Chairman and two Members. The Chairman of the Board of Directors also acts as CEO. The BoD members take part in its regular meetings and jointly decide on the items on the agenda.

In 2017, the BoD was comprised of the following members:

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

Pursuant to Article 27 of the Company's Articles of Association, it is forbidden for BoD members and Company managers to act in competition to the Company, professionally on their own account or that of third parties or to participate in companies without the permission of the General Meeting. Furthermore, the above persons must, in a timely manner, disclose to the Board of Directors any personal interests that they may have in Company transactions which fall within their duties, as well as any conflict of interest with the Company or its affiliated businesses.

Contacting the Management

In order to decide on a strategy for realizing the Company's investment plan, we communicate with the Company's shareholders systematically, at regular time periods, with the aim of informing them directly about the Company and the Greek market in general. The constructive two-way communication between the Employees and the Board of Directors continues. Our goal is to keep everyone abreast of Company related developments at all points in time, to the effective handling of the issues and needs arising at a human resources level, to reinforce teams collaborating with each other and help tap into the power of constructive dialogue.

Within this context, in 2017 meetings were held between the CEO with executives from all departments of the Company.

Committees

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

Executive Management Committee

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

2017

SUSTAINABILITY REPORT

Executive Compliance Committee

The main aim of the Executive Compliance Committee is to monitor the Compliance Management System. It deals with compliance issues affecting internal and external functions of the Company with respect to its principles and values, the implementation of the Code of Conduct as well as issues of SUSTAINABILITY . It consists of the CEO, the Chief HR Officer, the Legal Adviser, the Chief Commercial Officer and the Internal Audit & Compliance Officer. The Committee met three times in 2017 on issues concerning implementation of the Code. Among the decisions were:

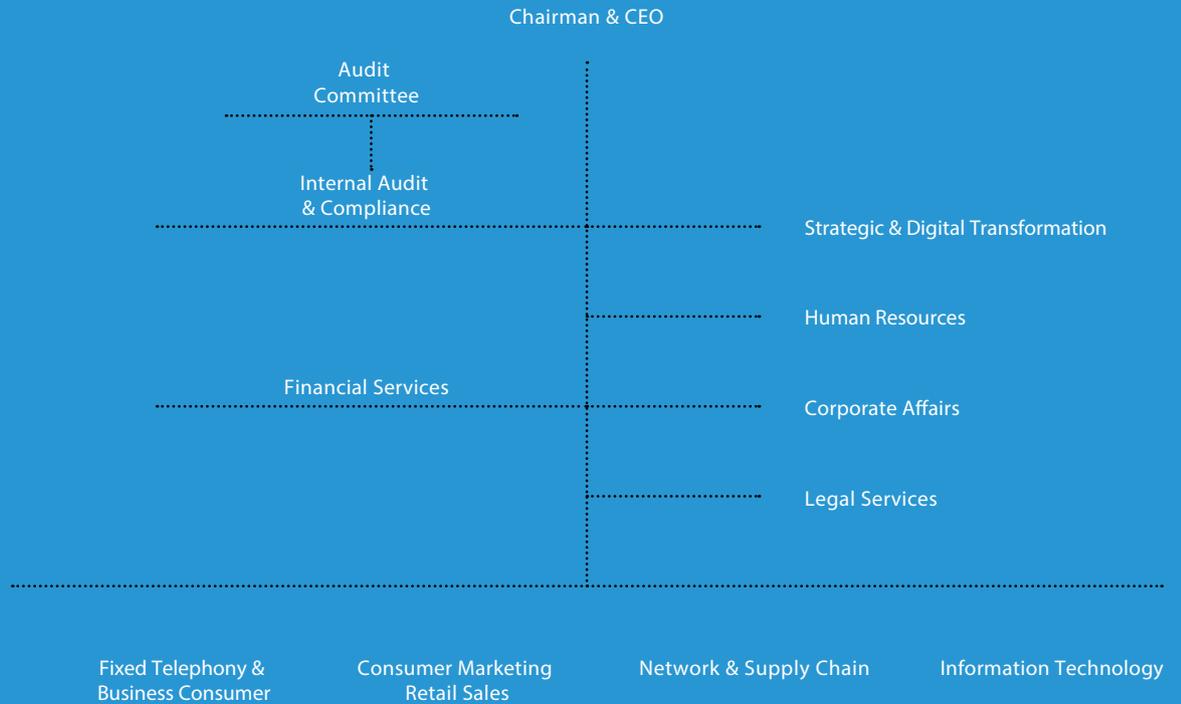
- Measures related to investigations concerning violations of the Code of Conduct
- Approval of training programs and actions related to the Regulatory Compliance System
- Review of compliance risk assessment
- Approval for the development of new policies

Information Security Committee

The Information Security Committee meets at regular intervals aiming at the creation of a corporate Information Security Policy and its implementation by the employees, in order to ensure security, confidentiality and integrity of information. The Committee is the central body of the Company that manages the Information Security Policy and may propose corrective actions aimed at maintaining and strengthening the information security audit mechanism through the procedures and systems of the Company. The Committee met in 2017 on issues related to the implementation of the Information Security Policies and the new Regulatory Requirements. The Committee is comprised of the CEO, the Chief Information Officer, the Chief Network Officer, the Senior Executive Corporate Affairs, the Information Security and Protection of Personal Data Officer and the Internal Audit & Compliance Officer.

Investments Committee

The Investments Committee is a permanent committee of the Management Team of WIND Hellas. The Committee is responsible for the prior assessment and approval or rejection of all major capital expenditures and investments of WIND Hellas, with the exception of financial investments. The Committee meets 2 times a month and is comprised of the CEO, the Chief Financial Officer, the Chief Commercial Officer, the Chief Information Officer, the Chief Fixed Line & B2B Officer and the Chief Network Officer.

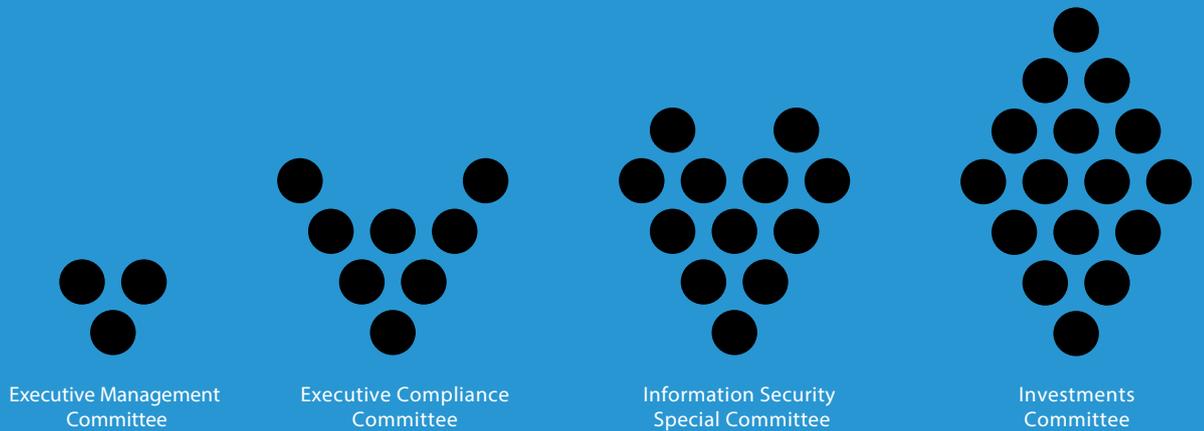


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WIND

COMMITTEES

FIGURE 4.2



CORPORATE GOVERNANCE STRUCTURE DIAGRAM

FIGURE 4.3



Internal Audit & Risk Assessment

The Internal Audit & Compliance Division is responsible to provide reasonable independent assurance to the Board of Directors of the parent Company that the Internal Audit System ensures compliance with Company policies, practices and procedures. This is accomplished by assessing the effectiveness of risk management systems, controls and governance practices. No conduct was observed in 2017 that would hinder the objectives and work of Management.

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

The Internal Audit & Compliance Division, in collaboration with Senior Management and Line Managers, carries out annually a Company-wide risk self-assessment in order to identify the operational risks and draw up the annual audit plan. Audit reports resulting from the conducted audits are submitted to Senior Management and the Audit Committee.

2017

SUSTAINABILITY REPORT

The identification and assessment of risks is a management tool that helps in better managing risks, taking proper decisions and achieving the corporate objectives. The results of the annual risk identification and self-assessment at Company level and management level, were presented in the first quarter to Management.

The Internal Audit & Compliance Division continues to apply the strategic plan, which describes actions to improve the company's operations as these were identified by the external assessment carried out by the company PwC. The risk assessment procedure is fully updated and automated, in the context of the annual audit plan design through the software Teammate. More than 200 functions were evaluated by more than 110 members of Senior and Line Management. The methodology followed for risk assessment is updated and fully in line with best practices.

The Internal Audit Division carried out a series of audits, regular and extraordinary, based on the plan that was approved by the Audit Committee of the Company. The control plan was completed (100%) during the year, including extraordinary audits that were decided during the year, with 4 final reports being issued in the first quarter of 2018.

Code of Conduct

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

01—Values

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

02—Tone at the Top

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

03—Ongoing Debate

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

04—Freedom of Choice

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

05—Corporate Culture

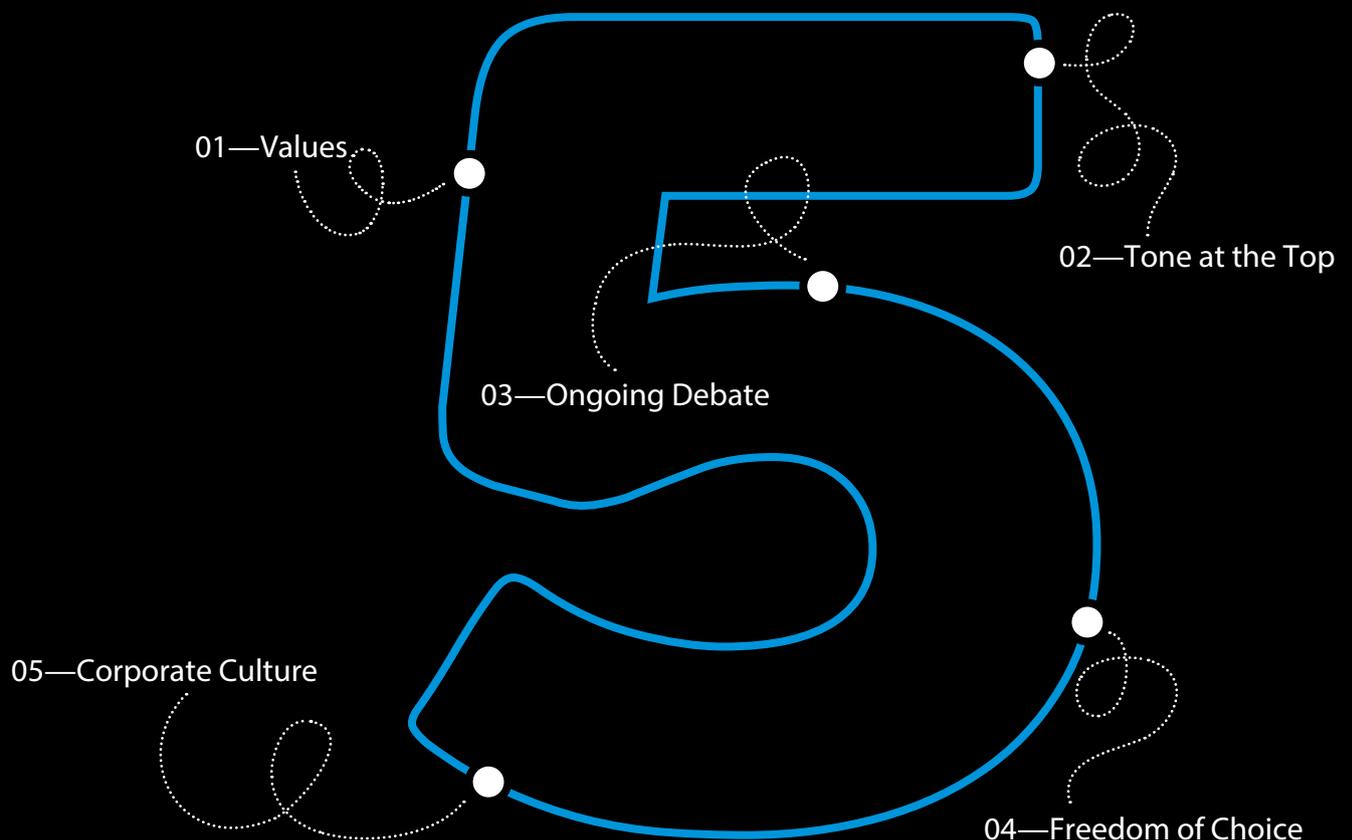
Establishment of a uniform corporate culture which shall make the Code part of our everyday behavior.

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WIND

CODE OF CONDUCT AXES

FIGURE 4.4



We operate under the **“WIND Hellas Code of Conduct”**, in order to create the right framework in line with the principles of good faith, business ethics and professional ethics, in order to give the opportunity to all employees to acquaint themselves with the rules and principles of good practice and ethics that we have adopted. The Code of Conduct sets out the relationships both among our employees and any third party they contact in the context of their work. At the same time, we have developed communication channels for named or anonymous complaints of breaches of the Code. Complaints can be made either online through the e-mail address **codeofconduct@WIND.gr** or by mail at the **Post Office Box: WIND Hellas, PO Box 61336, 151 04 Maroussi, Athens, Greece.**

In 2017, 13 reports were sent by mail or electronically. The majority of issues concerned customer complaints and relations with third parties. The foreseen internal investigation procedures were followed in all cases.

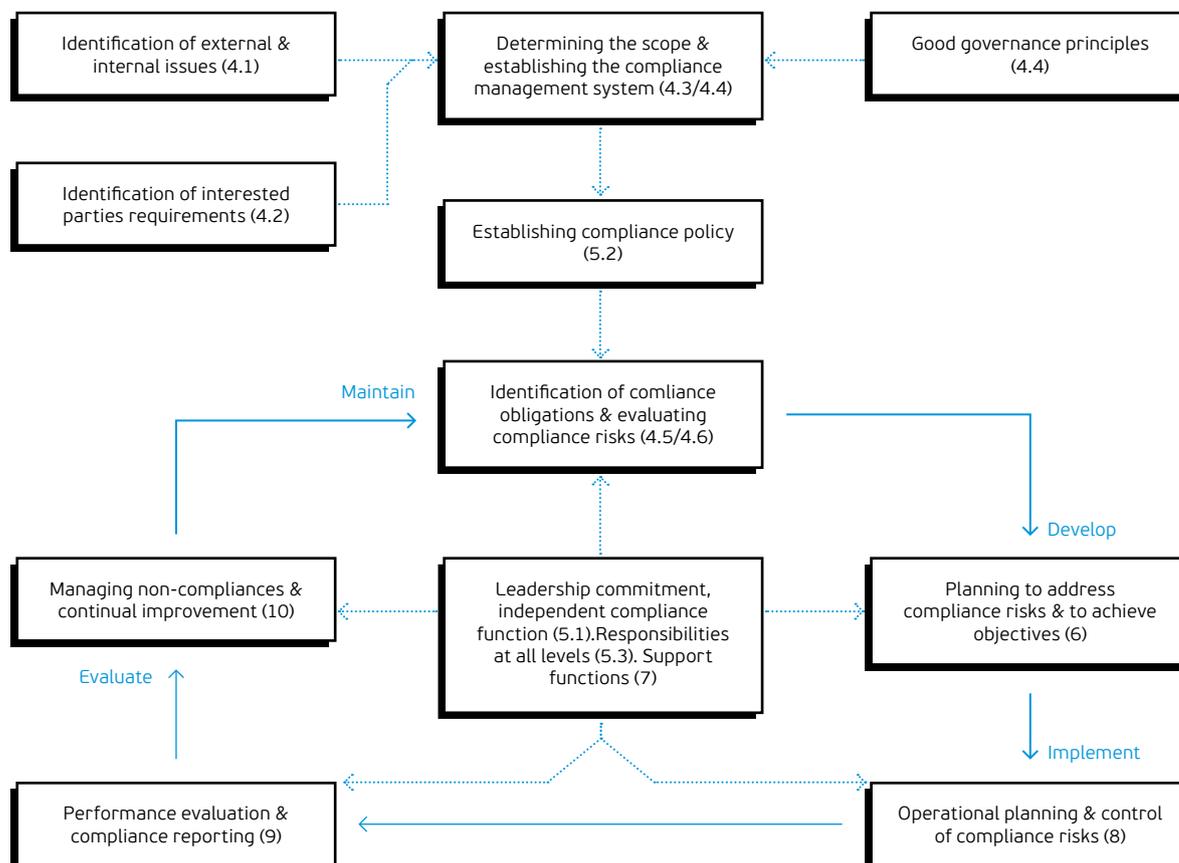
The main actions under the Code of Conduct were:

The implementation of ISO 19600 in the Compliance System

The ISO 19600 Compliance Management System has been implemented since 2016, which is not authenticated. The specific standard gives a framework for the application of the requirements related to compliance. It provides guidance for the creation, development, application, assessment, maintenance and improvement of an effective and responsive compliance management system. With the implementation of ISO 19600 we have achieved:

- The creation of a common framework of compliance throughout the Company.
- To reinforce the compliance image to our shareholders, the authorities and other stakeholders.
- To improve the compliance processes, such as education, awareness and monitoring.
- To completely identify and assess compliance risk areas, with the proper focus of financial and human resources.
- To reinforce sustainability.

FLOWCHART OF A COMPLIANCE MANAGEMENT SYSTEM



Employee education

With the goal of reinforcing even further the message of integrity and ethical conduct of WIND Hellas we made a series of presentations and speeches to all new Company personnel.

In addition, we designed and implemented the “Compliance Framework” that aims to support WIND Hellas in achieving its objectives by maintaining a flexible and responsible compliance framework that enables it to carry out its activities in accordance with legal requirements and internal policies.

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

Conflict of Interest Policy:

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

Gift Acceptance Policy

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

Fraud Response Policy with main directions

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

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WIND

We place primary importance in preventing and combating incidents of fraud. These are contrary to the Values and Principles governing our corporate operations and result or could result in undesirable consequences; with a severe impact to the Company’s reputation and interests of our customers, shareholders and employees.

Anti-Corruption Policy with main directions

- Describing the requirements of WIND Hellas to achieve compliance with applicable anti-corruption legislation.
- Guiding employees and associates as to how to behave.
- Achieving WIND Hellas’ compliance with existing laws that could subject, as a result of a violation, WIND Hellas, its managers and employees to serious sanctions, including fines and imprisonment, and could be detrimental to its business activities and its reputation.

Non-Retribution Policy

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

Management Systems & Certifications

In the Company we have developed, implemented and certified the following Management Systems:

- Integrated Quality and Environmental Management System
- Occupational Health and Safety Management System
- Social Security Business Continuity Management System

Quality and Environment Management

We apply a Comprehensive Quality and Environmental Management System that covers all our facilities and its scope of application includes:

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

The application of the Quality and Environmental Management System in our stores includes:

- Sales of mobile and fixed telephony and internet (WIND Mobile, Q Prepaid, WIND Fixed Telephony and Internet).
- Retail sales of mobile and fixed telephony devices, electronic equipment and accessories.
- Repair of mobile telephony devices.
- After sale service for private and corporate customers.

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

Quality: EN ISO9001: 2015

- Initial certification: 2001

Certificate Registration No. 44100011460

- Last certification renewal: 2017 based on the revised standard Certification body: TUV Hellas (TUV Nord Group)

Environment: EN ISO14001: 2015

- Initial certification: 2009

Certificate Registration No. 44104090360-000

- Last certification renewal: 2017

Certification Body: TUV Hellas (TUV Nord Group)

2017

SUSTAINABILITY REPORT

Occupational Health and Safety

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

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

The Occupational Health and Safety Management System was certified in 2017 in accordance with the requirements of the international standard below.

Occupational Health and Safety: BS OHSAS 18001:2007

- Initial certification: May 2017

Certificate Registration No. 4411617370062

Business Continuity Management

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

- Design, development, provision, sales and support of comprehensive telecommunications products and services (mobile and fixed telephony, data, internet and broadband) for private and corporate customers.
- Design, development, implementation, operation, support and maintenance of telecommunications and IT infrastructure, telecommunications and data networks, IT systems and applications.

The Social Security Business Continuity Management System that we apply was certified in 2017 in accordance with the requirements of the following international standard.

Business Continuity: EN ISO22301:2012
• Initial certification: 2017
Certificate Registration No. 054170001
Certification Body: TUV Hellas (TUV Nord Group)

At the same time, we are fully compliant with the requirements arising from the Regulatory Authorities GG 305/14-2-2012 (EETT: Decision No. 7560/153) and 1742/15- 7-2013 (ADAE: Decision No. 205/2013).

Crisis Management Process

Following the Internal Audit proposal, we are preparing a comprehensive Crisis Management Plan (WHCMP) that will provide the management structure, the basic responsibilities and general procedures to be followed before, during and immediately after a crisis. Its implementation is currently underway and is expected to be completed in 2018.

Measurements of E/M Fields: ISO 17025

We design, implement and operate our network in line in consideration of the safety of services as well as the protection of the general population and the environment. Specifically, we monitor the levels of electromagnetic radiation and cooperate with specialized High Frequencies Measurements Laboratories accredited in accordance with the requirements of the standard ELOT EN ISO/IEC 17025:2005 by the Hellenic Accreditation System (ESYD).

Simplification

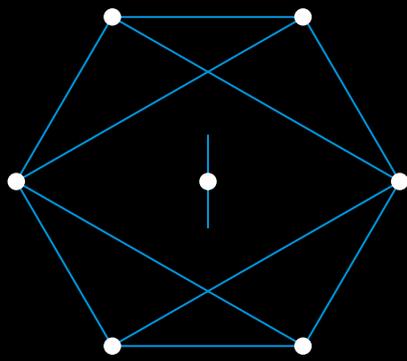
With the motto "One of your ideas has the power to simplify our Company's procedures. Just share it!" and, in order to promote the value of simplicity in what we do, the "Do you see things simple?" program has now been established as an effective channel for the promotion and implementation of employee ideas for simplification and continuous improvement.

In addition, through the Customer Experience transformation program, simplifications in processes are designed and implemented with the constant improvement of customer experience.



2017

SUSTAINABILITY REPORT



SOCIETY →

We support Important Goals

2017

05

SUSTAINABILITY REPORT



We support with actions of essence the achievement of important social goals that make a difference and help people in need, especially children. We contribute with resources and various actions to improve the standard of living and reinforce social cohesion through information, awareness and contribution.



At a glance

4,000



WIND RUNNING TEAM RUNNERS.

14



TEDX ORGANIZATIONS WE SUPPORTED
ALL OVER GREECE.

7



YEARS CLOSE TO THE PARENTS AND
THE CHILDREN WITH THE KIDS@SAFETY
ACTION FOR THE SAFE USE OF NEW
TECHNOLOGIES.





p. 64-65

WIND

Our responsible activation towards Society is a strategic goal for each of us. We contribute with all appropriate means, providing support to actions, organizations and people in need.



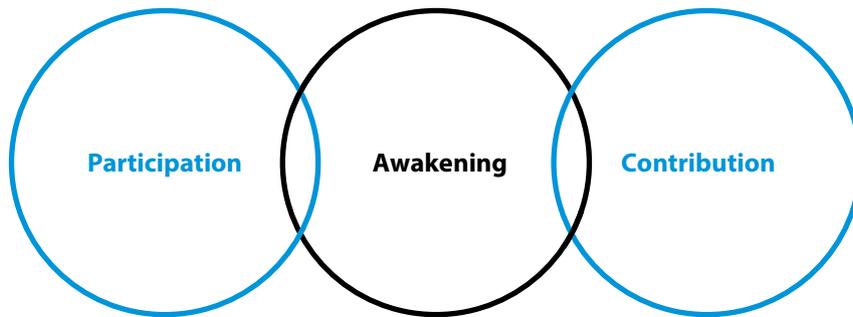


Our Approach

For another year, we supported innovative ideas, sports, education and inspired in our fellow human beings - employees, customers and citizens - social solidarity and environmental consciousness.

Participation, Awakenings, Contribution

In 2017 we realized our social plan giving special emphasis in supporting actions and organizations so they are able to implement their plans; not only to be able to survive, but also to thrive. For one more year we worked with consistency on the basis of a triple axis of action: participation, awakening and contribution.



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WIND

Running is within us

TOGETHER FOR CHILDREN (Athens), Asylum of Children (Thessaloniki), Hellenic Children’s Village in Filyro (Thessaloniki), IASO (Larissa), Association of Parents of Guardians and Friends of People with Autism (Larissa), The Smile of the Child (Heraklion), Annex of Epirus of the Hellenic Society for the Protection of Autistic People (Ioannina), Association of People with Multiple Sclerosis (Kastoria), Social Organization of the Municipality of Patras (Patras), Center for Social Welfare of the Region of the South Aegean (Rhodes), Athletic Club of People with Disabilities (ASAmE) KOTINOS (Alexandroupolis) are the Social Bodies supported by WIND through running races in which it took part in 2017 with its team throughout Greece.

More than 4,000 employees, friends and associates of the Company took part in the WIND Running Team in the Athens Authentic Marathon and the Half-Marathon, Run Greece Road Races and the Great Marathon Alexander the Great in Thessaloniki, contributing at the same time to WIND’s social activities.



**SOCIAL WELFARE CENTER
OF THE REGION
OF THE SOUTH AEGEAN**

**SOCIAL AGENCY OF
THE MUNICIPALITY
OF PATRAS**

Through the participation of the team members and all runners, the Company supported for another year the children who daily give their own difficult struggle for life, offering the sum of €78,000.

WIND's relationship with running begins in 2011 along with the support of professional athletes. Athletes, such as Magda Gazea, Kostas Gkelaouzos, Anastasia Karakatsani, Markos Gkourlias, Konstantina Giannopoulou, Glykeria Tziatzia and Giorgos Dialektos represented the Company in 2017, both inside and outside the games, contributing to the promotion of the running phenomenon in Greece.



Konstantina Giannopoulou
Medium distance champion - Member of the National Team

Born in Nafplio in 1994, Konstantina is the 4th best Greek woman of all times at 800 meters in the closed track. In 2016, she won the Pan-Hellenic Championship M/W at 800 m and in 2017 1st Balkan winner in 800 m closed track. At the same, time Konstantina finished 1st Greek in 5 km in the 35th Athens Marathon.

2017

SUSTAINABILITY REPORT



Anastasia Karakatsani
Medium and long distance champion

In 2013, she amazed the audience in Finland in the 10,000-meter race with a record-breaking achievement at the closed track European Youth Championship. This was just her second official race in that distance. In 2014 and 2015, she was the first woman to cut the thread at 10 km in the Athens Authentic Marathon. In March 2016 she first tested her forces in the Half-Marathon Championship held as part of the 5th Athens-Half Marathon standing on the 2th place on the podium, while in the 35th Athens Authentic Marathon she finished 2nd Greek woman in the 10 km race with a time of 36:47. The young athlete, despite the few years of her official athletic career, already counts many records and international distinctions at 1,500m - 3,000m - 5,000m - 10,000m and in Half-Marathon. She is born in 1992 in Volos.



Glykeria Tziatzia
Long Distance Champion - Trail Runner

She finishes firmly on the 1st place in women in almost all of the country's mountain races and started mountain running only about four years ago. Glykeria was born and grew up in Megarchi, Trikala. In 2017 she first tested her forces in a race, taking part in the 35th Athens Authentic Marathon where she finished 2nd Greek woman in the classical route of 42,195 km in the Panhellenic Championship.



Kostas Gkelaouzos

Medium and long distance champion, member of the National Athletics Team

In the 35th Athens Marathon, Kostas Gkelaouzos finished first in the classical route and became the champion of Greece for the first time. His career has been built on a series of major victories: He won the Pan-Hellenic Half-Marathon Championship in March 2016 as part of the 5th Athens Half-Marathon, achieving at the same time a route record. He also holds the first place and the gold medal in recent years in the 10km Athens Authentic Marathon. Since 2012, he has more than 30 distinctions and 10 records in Open and Closed Tracks. He belongs to the '90s generation and grew up in Amfissa.



Magda Gazea

Long distance champion - Marathon runner

With about 15 years of experience, she is one of the top marathon runners. Magda Gazea has linked her name with the Authentic Route, the Athens Marathon, the participation in which is a great desire of Greek and foreign runners. She was born in Thessaloniki in 1977.



Giorgos Dialektos

Trail Runner

One of the top athletes of his generation, he started with Classical Athletics and has spent the last 6 years exclusively on mountain running. He participates with many records and first places in almost all the mountain fights organized in Greece and the Greek skyrunning championship. He was born in 1984. In 2000 he started the track and very quickly achieved important distinctions. In 2001 he was 11th in the World Children Championship in 2,000 meters in Hungary. In 2012 he won the 1st place in the Pan-Hellenic Men's Championship in 3,000m steeplechase. In 2003 he was 3rd Junior Balkan winner in 3,000 meters in Istanbul. Since 2001, Giorgos holds the Panhellenic Record in 2,000m steeplechase.



Markos Gkourlias

Champion of middle and long-distance running, member of the National Athletics Team.

Although only 23 years old, Markos is a medium-distance champion and represents the country by participating with the National Team in international competitions such as the Eugene World Athletics Championships in the United States, the International Ghent Meeting, the International Meeting in Bratislava, Slovakia, and others. In February 2016 for the second consecutive year, he was the first to score at 8,000m in the Panhellenic Championship of Off-Road Running and first in the 5,000m in the Hellenic Open-Track Championship. Respectively, in 2017, he won the 2nd place in 5 km at the Athens Authentic Marathon.

We Come Closer | Sikinos

At a time when new horizons in economy and society emerge from the use of technology in the digitally grey areas of Greece, it is easy to understand that islands like Sikinos are experiencing an uneven digital reality. This was why Sikinos, in Christmas 2017, became the second destination of the "We Come Closer" program. With our continuous investment in new technologies, we managed to bridge every physical obstacle by offering free communication, unrestricted access to the modern digital world and an unparalleled customer experience in our Network for all residents of the island. In addition, we also donated one smartphone to younger people, including school teachers, police officers and doctors on the island, as well as a single-function device for those over 65 years of age. Recognizing that the first "nursery" of digital skills is the school, we offered to all Sikinos Primary and High School students a state-of-the-art laptop, equipped with free wireless Internet through our network coupled with a pre-installed f-secure parental control program. In an effort to make a positive contribution to the daily lives and work of our residents, by improving their living throughout the year, we have highlighted Internet communication and connectivity as the foundations of the new digital reality. We offered communication and digital access for free. To everyone. For a whole year.

The journey does not stop here. It goes on...
Our commitment is to come closer.

2017

SUSTAINABILITY REPORT



7 years supporting proper use of new technologies with parents and their children.



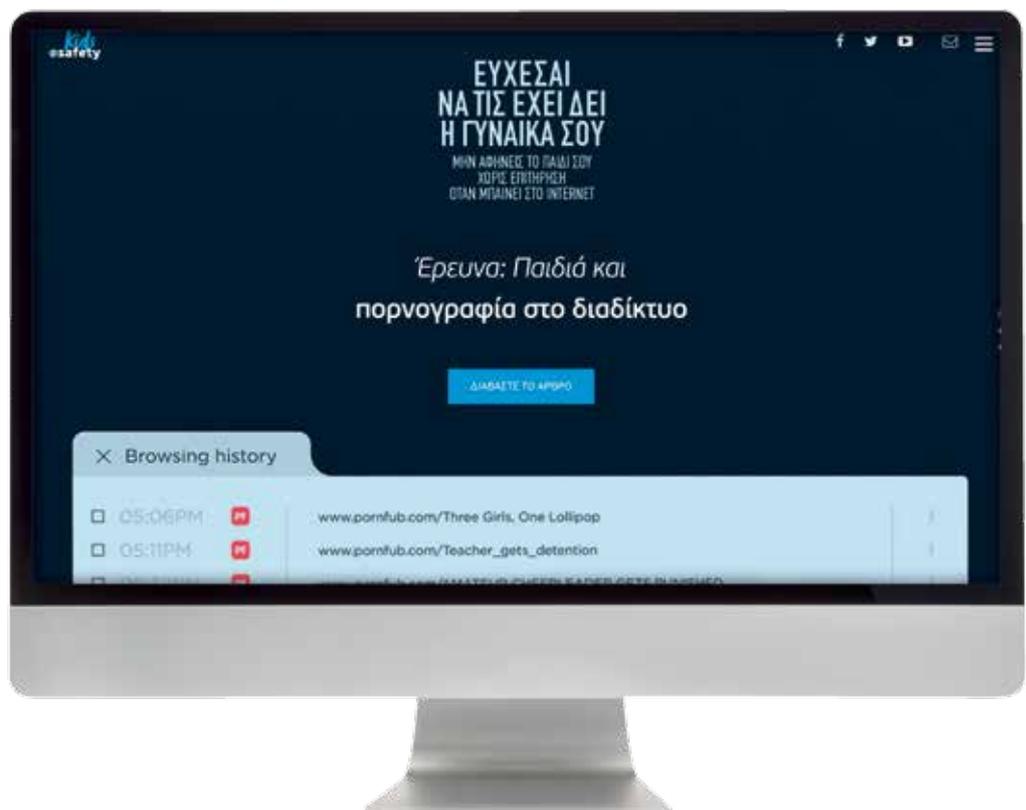
Recognizing the need for parents, teachers and children to be constantly and properly informed about new technologies, we have been implementing the Kids@safety awareness campaign since 2010, focusing on the need to familiarize with new technologies and ways to address the challenges of digital world.

The campaign also highlights the importance of promoting the positives aspects of new technologies as tools in our daily lives and encouraging the dialogue between children and parents on the safe use of the Internet. The basic axis of the campaign kids@safety is the website: www.kidsatsafety.gr, supplemented by the respective social media pages on Facebook & Twitter that expand the channels of communication and utilize the advantages of the digital era in information and communication.

We continue to cooperate with the Cyber Crime Unit of the Hellenic Police in 2017 as the exclusive sponsor of the website www.cyberkid.gr and the respective Mobile app, Cyberkid.

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WIND



TEDx throughout Greece

**8th year → 14 events →
180 speakers → 5,500 audience**

This year we continued a series of TEDx events held throughout Greece. TED aims to motivate people, through ideas to change their lives and the world. In this way we support people that are special, inspire and help form a better world.

TED is a non-profit organization devoted to promote ideas worth spreading. In 2017, we supported twelve TEDx events throughout Greece. More than 180 speakers showed what is truly of value, to a public that exceeded 5,500 viewers.

2017

SUSTAINABILITY REPORT

Institution: WIND BUSINESS DAY

4th year → 40 participants → Business Simulations in communications & marketing + soft skills workshop

For the 4th consecutive year we participated in the Business Days institution in the context of the Entrepreneurship and Career Panorama held by the Research Center of Strategic Business Management and Entrepreneurship. At the Company's headquarters in Maroussi and within 8 hours, the 40 participants had the opportunity to get to know the structure and operation of WIND Hellas, and were then divided into groups according to their academic profile and attended Business Simulations based on real case studies. Together with experienced Company Executives, they shared ideas and views on how to solve business challenges in the telecommunications and marketing sectors. They also participated in a short Workshop on efficiency and personal/professional development. The main purpose was for university students to become acquainted with the business world and the job market, particularly in the telecommunications' sector.

Social Product

Despite the rapid technological development and the humanitarian crisis characteristic of our era, at WIND we believe that technology, when used properly, can help vulnerable social groups. By acting on our beliefs, we contribute to covering their telecommunications needs aiming to reduce social isolation.

WIND CARE

WIND Hellas gives the ability to persons with a degree of disability (hearing impaired, families of individuals with severe learning disabilities, physical and multiple disabilities) to communicate through text messages (SMS) at prices reduced by 50%.

Support Lines

• I Offer

This is a joint charitable initiative of the three mobile telecommunications operators in Greece, which began in February 2006. The service involves the activation of a common 5-digit number for a specific period of time; during which mobile subscribers are able to send as many SMS they wish (at a cost of €1 plus VAT). Thus, they are able to support a Non-Profit-NGO every time they do so. In 2017 the service was activated 17 times. The total net revenue (excluding VAT) generated from the use of the service is given to the eligible organization or institution that organized the charitable event, without any deduction. The amount collected in 2017 through the "I Offer" service for various organizations was €11,194 (excluding VAT).

• SOS Children's Villages

Our subscribers are able to donate €2 to the SOS Children's Villages by calling the number 14567 or sending an SMS to the number 19820. In 2017, WIND's subscribers contributed €446.21 to SOS Children's Villages (excluding VAT).

• Arc of the World

Our subscribers can donate €2 to the Arc of the World by sending an SMS to 19888 or 19828. In 2017, our subscribers contributed € 17,657.42 (excluding VAT) to the Ark of the World.

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WIND

• ELEPAP

Our subscribers are able to donate €2 to ELEPAP by sending an SMS to the number 54980 or 19811. In 2017, our subscribers contributed €1,247.80 (excluding VAT) to

• Agkalia

Our subscribers are able to donate €2 to the NGO "AGKALIA" by sending an SMS to the number 19829. In 2017, our subscribers contributed €163.20 (excluding VAT) to the

Help Lines of

• "Amber Alert Hellas"

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

• "European help line for children"

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

• "SOS Line – The Smile of the Child"

We offer our subscribers the option of calling 1056 free of charge from their mobile, thus helping to deal with serious incidents in which children are the victims. In addition, we are giving the opportunity to donate € 2 via SMS to 19810. In 2017, € 54,371.31 was given to the organization "Smile of the Child".

Emergency Lines

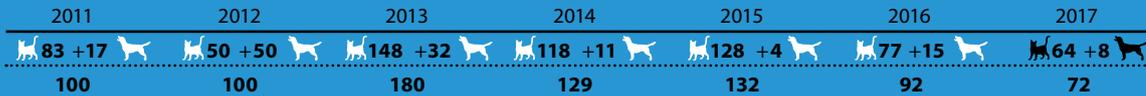
Through our network, we provide our subscribers the option of free calls to emergency numbers such as 100, 166, 199, 112, 197 and 108, even in case of barriers due to debts. The numbers quoted are free of charge, under the National Numbering Plan and the relevant regulatory framework.

Animal Action

2011-2017 → 805 animals

We are constantly strengthening the Animal Action Hellas efforts to reduce the stray animal population in Greece by supporting the organization's annual sterilization program. To date, over 800 stray animals have been sterilized throughout Greece. The magnitude of our aid is best understood by considering that there could potentially have been born another 19,200 stray animals from those 800 animals. 2017 was a very successful year for our collaboration, as through the sterilization program at the Drug Rehabilitation Center for Prisoners in Eleonas, Thiva, we witnessed the very therapeutic relationship that can be developed between animals and vulnerable social groups.

PARTNERSHIP WIND-ANIMAL ACTION HELLAS: 2011-2017

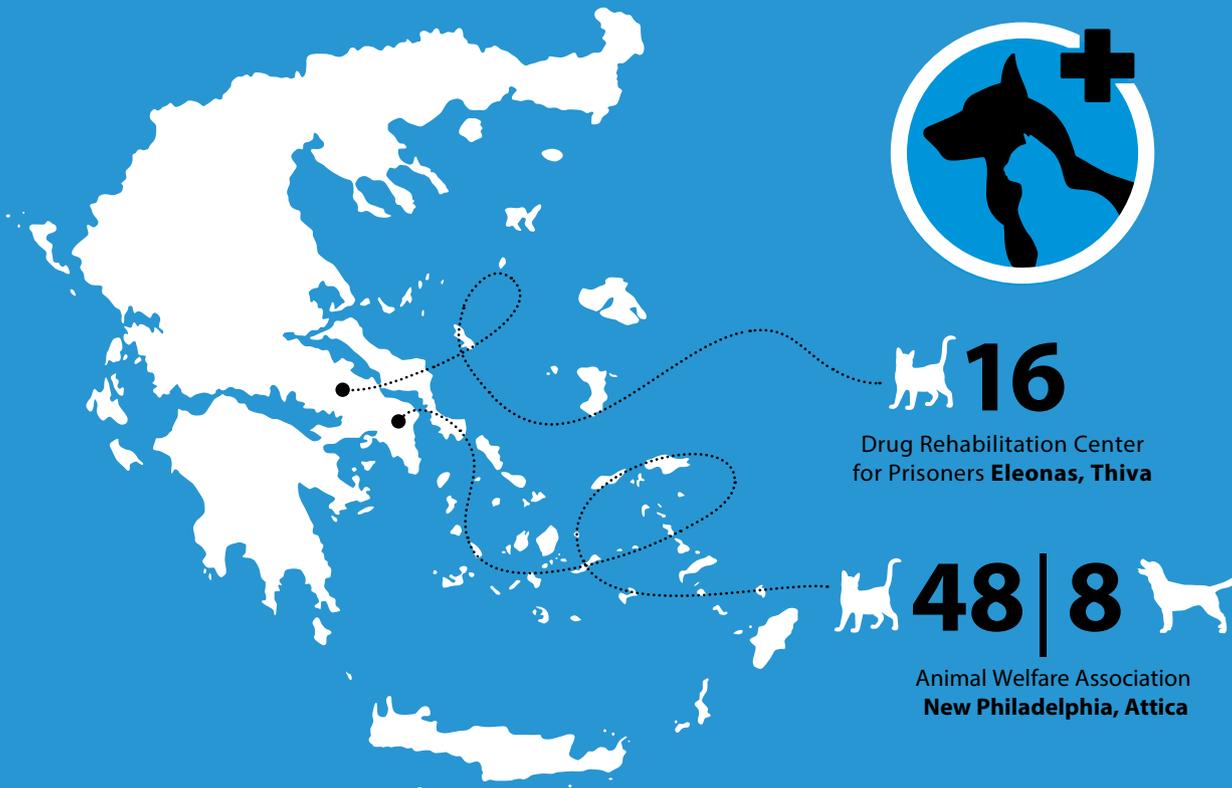


$$668 \text{ } \img alt="cat icon" data-bbox="180 430 225 465"/> + 137 \text{ } \img alt="dog icon" data-bbox="380 430 445 465"/> = 805$$

2017

SUSTAINABILITY REPORT

STERILIZATION PROGRAM WIND-ANIMAL ACTION HELLAS 2017

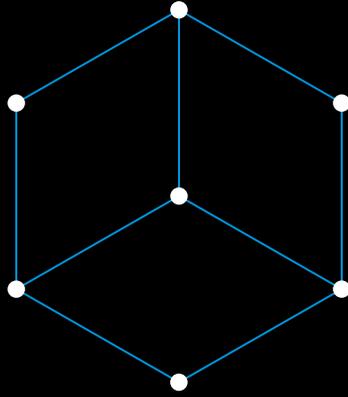




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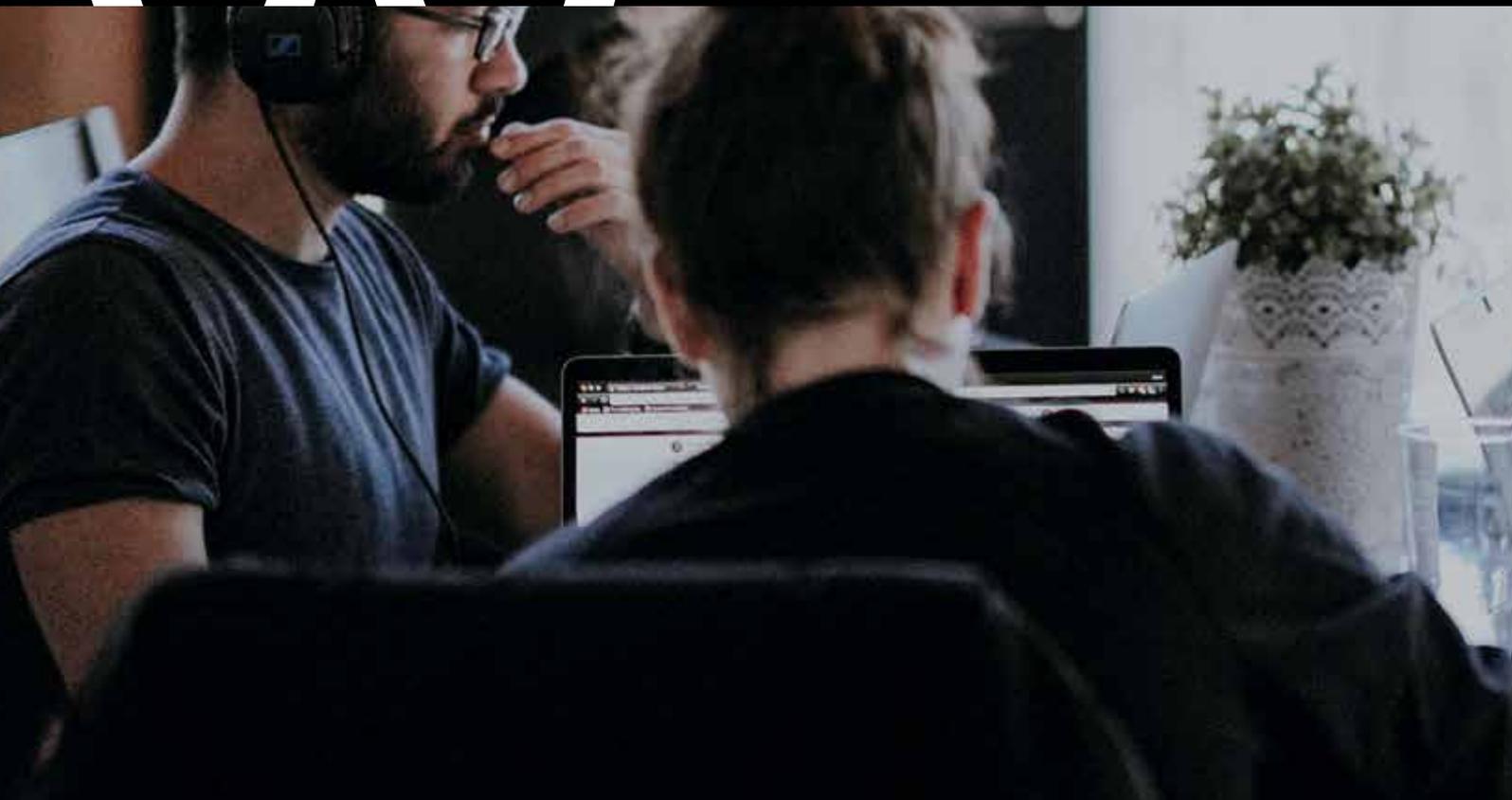
OUR EMPLOYEES →

We promote the development of our employees

2017

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SUSTAINABILITY REPORT



We actively and positively support our employees as our driving force. We contribute effectively so their capabilities are promoted and utilized, by offering them information and the ability to participate in volunteering programs and social responsibility actions.



At a glance

1,015



EMPLOYEES

105



NEW RECRUITMENT

10



NEW YOUNG TALENTS

28,530



HOURS FOR EDUCATION OF
EMPLOYEES

450



UNIQUE "EUWIND" PARTICIPATIONS

1,200



EMPLOYEES WITH THEIR FAMILIES IN
THE 1st "EUWIND" FESTIVAL





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WIND

Our Approach



The socially responsible action of a business positively affects its relationship with its employees, as confirmed by our annual survey of employees' views. In fact, according to the latest survey, **8** out of **10** of our Company employees are satisfied with the way the Company contributes to the community.

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SUSTAINABILITY REPORT

A necessary condition for success in the internal recognition of Corporate Responsibility is not only keep up informed but also the participation of our employees in all social responsibility programs and the company's volunteering action. At the same time, it is also our responsibility to incorporate new initiatives that concern our employees; focusing on actions that support employment, development, care, social responsibility and the reinforcement of our corporate culture. In this context, in 2017 we undertook the following activities:

- Design of internal programs to reinforce employee commitment
- Increase of education and development programs for all employees
- Increase of reward incentives and retention of talent
- Talent management and diversity
- Maintaining programs for rewarding exceptional results
- Design and implementation of the internal activities and welfare program "euWIND"
- Enriching events for all employees and their families
- Reinforcement of internal communication and dialogue
- Provide new digital tools that enhance teamwork and efficiency.
- Optimization of organization and operation through simplification and redesign of procedures

Human Resources Data

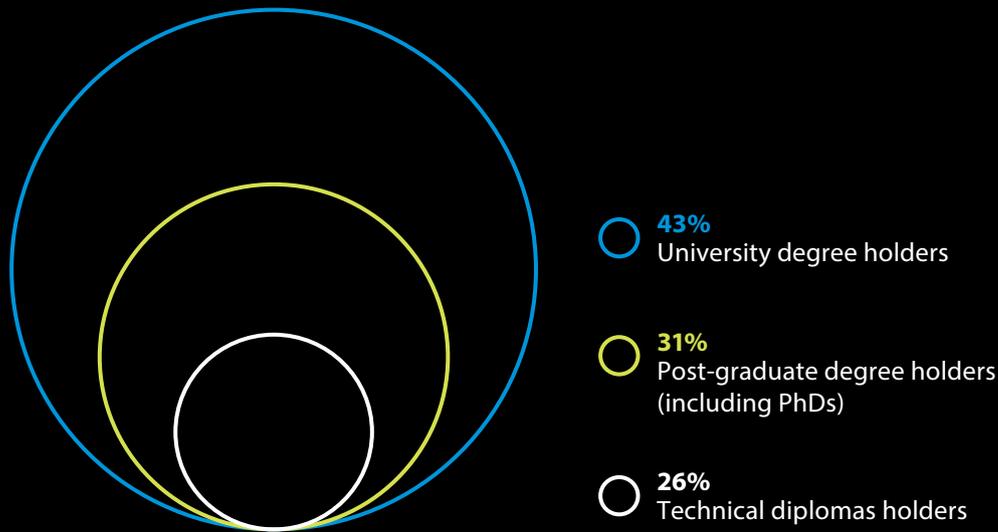
At WIND Hellas, our ongoing goal is to attract, retain and develop professionals. Here, exceptional people who are passionate about learning and development in a dynamic environment of new technologies can make their way to an exciting career. During 2017, we contributed significantly to the economy of our country by employing 1,015 employees.

Department	Total Employees	
	2016	2017
General Management and other Administrative Departments (Internal Audit, Legal & Regulatory, Corporate Affairs)	34	16
Human Resources	23	24
Consumer Marketing	267	255
Retail Sales	85	94
Fixed Line & B2B	133	137
Finance	95	98
IT	131	135
Network & Supply Chain	219	231
Strategic & Digital Transformation		25
Grand Total	987	1,015

EMPLOYEES' DATA BY ADDRESS & GENDER

TABLE 6.2

Department	Gender	Number of Employees	%
General Management and other Administrative Departments (Internal Audit, Legal & Regulatory, Corporate Affairs)	F. M.	12 4	75% 25%
Total		16	
Human Resources	F. M.	16 8	66,6% 33,3%
Total		24	
Consumer Marketing	F. M.	194 61	76,08% 23,92%
Total		255	
Retail Sales	F. M.	48 46	51,06% 48,94%
Total		94	
Fixed Line & B2B	F. M.	62 75	45,26% 54,74%
Total		137	
Finance	F. M.	57 41	58,16% 41,84%
Total		98	
IT	F. M.	34 101	25,19% 74,81%
Total		135	
Network & Supply Chain	F. M.	46 185	19,91% 80,09%
Total		231	
Strategic & Digital Transformation	F. M.	11 14	44% 56%
Total		25	
Grand Total		1,015	



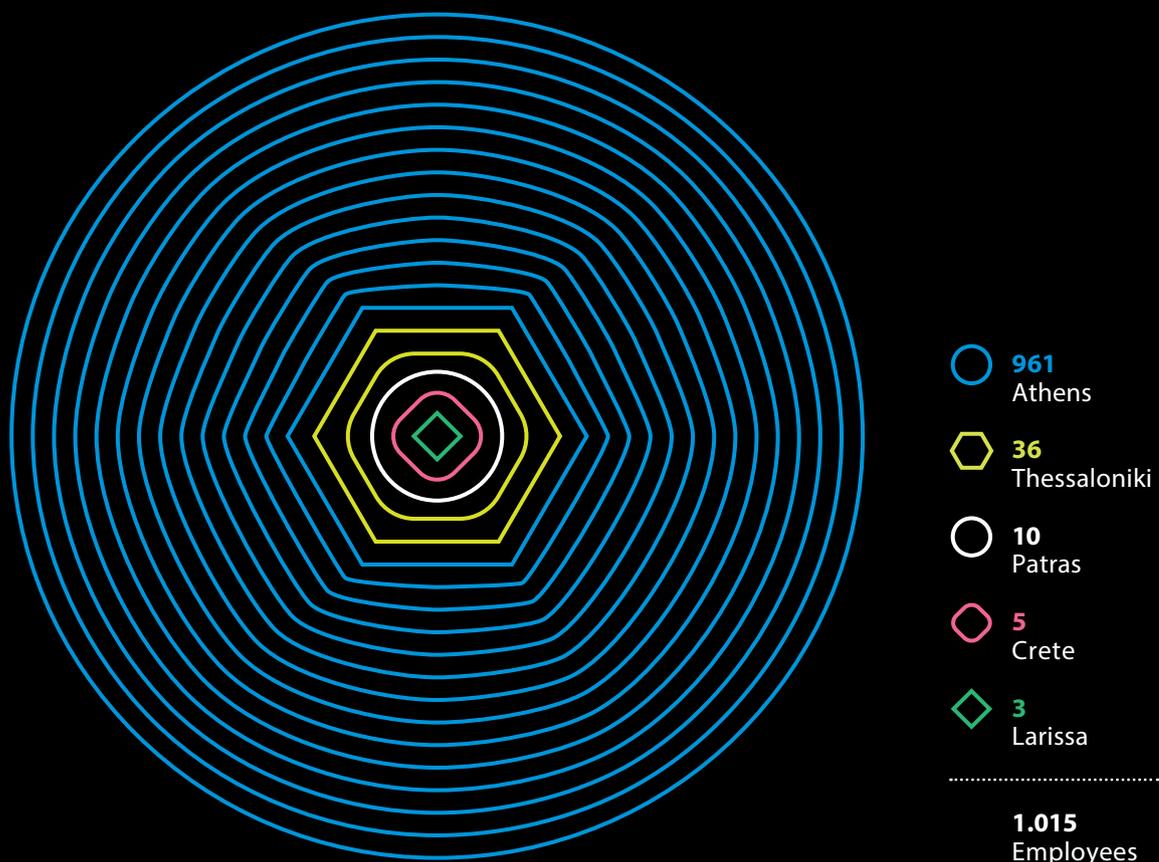
98.82% of employees are employed under permanent employment contracts (of which 0.01% are employed under part time employment contracts). The remaining 1.18% of employees are employed under defined term employment contracts (of which one is a part time employment contract). In 2017, we made 105 new hires, of which 5 concerned the region (Thessaloniki, Larissa and Patras). The “open” jobs at our company are posted on our website www.wind.gr, as well as on websites related to the job market.

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DISTRIBUTION OF EMPLOYEES BY REGION

FIGURE 6.2





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WIND

Human Rights & Equal Opportunities

With regard to human rights, we absolutely respect and abide by all international human rights provisions, and are in line with the UN Global Compact, which our company has signed and ensure that no minors are hired and that there are no incidents of forced labour in our company.

Freedom of Association

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

Internal Work Regulation

Our transparency and integrity in how we operate is reflected in the Internal Work Regulation we have drawn and apply. This regulation promotes ethical values, respect for laws and proper business practices and the creation of a suitable work environment. All employees have access to it through the WIND Hellas corporate Intranet.

Benefits

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

New employees receive a detailed presentation of all benefits from the Human Resources. In addition, information leaflets are distributed as well as information cards with the telephone numbers for each department, and employees can also access a dedicated website for further information.

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Benefits Plan

- Competitive remuneration packages - fixed and variable - which are based on market comparisons and reward employee contribution to the achievement of the corporate goals.
- Life insurance with disability - accident coverage.
- Group medical coverage plan with the participation of employees' families.
- Package for preventative checkup for all employees.
- Subsidized private pension plan.
- Preferential use of mobile, fixed telephony and internet.
- Restaurant - coffee shop (at Kifissias Avenue and Athinon Avenue) with discounted prices.
- Discounts on company products at WIND stores with benefits under the card reward program for transactions through WIND Bonus cards.
- AMEX and WIND Bonus VISA.
- Discounts and special offers in shops and companies throughout Greece.

WIND win – WIND for you

At WIND we ensure for us and for our loved ones even better competitive prices, discounts and offers on all product categories, seasonal Bazaar with discounts and up to 91% discount on devices and accessories, as well as for products and services of our partners in various categories throughout Greece.

WIND friends & family:

Discounts on mobile, fixed telephony and bundle programs, mobile broadband and prepaid offers, for us and our loved ones. Since 2014 the free service 1240 has been available for direct and exclusive telephone service for us, our families and our friends for WIND products and services.

Employee Health & Safety

At WIND it is our priority to protect the health and safety of our employees as well as that of visitors and associates who work in our facilities. This is why we take the required measures to minimize the potential for an accident to occur at the workplace.

Our goal is zero accidents and the constant improvement of the indices related to the workplace in the buildings where our employees work. The following table summarizes the incidents related to health and safety issues during the last few years, without any serious accident involving the loss of life of any employee.

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WIND

	Losses to employees	Number of accidents (absence > 1 day)	Number of accidents (absence > 3 days)	Total days absent
2016	0	0	0	0
2017	0	0	0	0

To achieve the above, we apply an occupational health and safety system that we have certified under the Occupational Health and Safety Assessment Series (OHSAS 18001:2007) international standard in 2017.

In the context of the applied system we establish policies, procedures and instructions where required, and suitable programs to monitor and manage risks; making our commitment clear with regard to protecting the health and safety of our employees and third parties at our facilities and to constantly improve our performance in this field.

In order to identify risks in the workplace, we prepare, in accordance with the applicable legal framework, Occupational Risk Assessment Studies for each facility, with the assistance of qualified consultants, Safety Officers and Occupational Physicians. The identified risks are then analyzed and placed in categories according to the weight and their potential, and then measures are taken to reduce or eliminate the related risks, provided this is technically feasible.

Moreover, we conduct workplace measurements for dust, ventilation, lighting, volatile organic compounds, temperature, humidity, quality of potable water and, if required, other measurements such as radiation, noise etc. All results are within the limits imposed by legislation but in any case the measurements are repeated at regular intervals to ensure the quality of the work environment.

In 2017, we published an information leaflet advising our employees on working too many hours in front of the computer, as well as on the importance of proper body posture and the provision of advice from the Occupational Physician to each employee individually.

Finally, with respect to the organization's response to emergencies we have specially trained teams for emergencies whose main responsibility in case of emergency is to care for the timely, safe and smooth evacuation of personnel, visitors, third parties and associates that may be inside our facilities. These teams are trained from time to time on matters of fire fighting and first aid, as well as on emergency procedures by the experts on each issue, the Fire Department and the Safety Officer/Occupational Physician. At the same time, we are investing more than €1 million for the overall upgrading, modernization and interconnection of the fire protection systems in our buildings all over Greece with state-of-the-art systems and according to the strictest international standards to ensure the highest level of protection of our facilities and our best response under any circumstances.

Maternity leave

In 2017 the number of employees entitled to maternity leave was 35, all of whom used it (including cases where the maternity leave started in 2016 and continued into 2017). Out of the 35 mothers who have used the maternity leave, 26 have returned to work, and the remaining 9 are expected to return.

Employee Growth and Development

At WIND Hellas, the human resources management philosophy is connected to the concepts of continuous training, encouragement and support of initiatives so as to form a high quality work environment that respects, supports and develops employees.

Our growth is based on the design and implementation of training and development actions on an individual and group level.

The Personal Development Plan ensures that all our employees have the opportunity to advance according to their abilities and our Company's needs based on a common model of skills. This plan is carefully designed for each one of our employees in close cooperation with their supervisor, via Grow@WIND, and based on the development experiences that are necessary for the achievement of our common goals.

Human Resources Development Procedure Grow@WIND

Everyone at WIND Hellas is proud of the high performance and continuous growth that are the main components of our culture. The main tool is Grow@WIND, designed in February 2013, and used by each employee with their supervisor. It was designed with the support and participation of all of us, especially of the Management Team, the Human Resources Division and various working groups from different departments.

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

The purpose of the development procedure is:

- To help us think about our development and to structure our development plans, taking responsibility for our personal growth.
- To give us the opportunity to take greater value from our development in order to:
 - improve our performance
 - pursue our professional expectations.

In fact, in 2017, Grow@WIND was hosted for the first time on the online self-service me@WIND platform, which gave user autonomy and empowerment (employees and supervisors), with the motto "Our Growth with a Click". In addition, the new system has allowed us to receive multi-faceted feedback from colleagues with whom we regularly work from different working groups.

To make the best use of the process, annual interactive workshops have been held since 2014 onwards for all Company employees and team leaders.

Moreover, throughout the annual Grow@WIND process and to facilitate the formation of the Personal Development Plans we established the concept of Grow@WIND week, during which all of the Company's meeting rooms are booked, from 2 p.m. onwards, for meetings between employees and their supervisors solely with respect to the feedback process and for creating development plans.

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WIND

Education

Our key priority is the continuous training of our employees so that they can grow while improving their performance through equal training opportunities on the subject of their work. In 2017, we provided 28,530 hours of training on technical and managerial skills.



Category	Hours of Training	Percentage	Average training / employee	
Upper level executives	1,343	5.75%		
Mid-level executives	4,285	18.33%		
Technical Personnel	8,224	35.18%		
Sales & Customer Service	4,206	17.99%	23.8	2016
Remaining Personnel	5,321	22.76%		
Total	23,378	100%		
Upper level executives	1,429	5.01%		
Mid-level executives	3,465	12.15%		
Technical Personnel	14,147	49.59%		
Sales & Customer Service	3,792	13.29%	28.5	2017
Remaining Personnel	5,698	19.97%		
Total	28,530	100%		

Show that your growth does not stop

Leadership Campus

The "Leadership Campus" is a challenging educational program tailored to the characteristics and requirements of the wider group of our executives. It is based on the latest development methods through multi-theme and interactive workshops, meetings, coaching and participation in information workshops. For the 5th consecutive year, we conducted 527 hours of training with the participation of 17 executives, whereas the total hours from the start of the program are 6,606 with a total of 247 participants.

"Pathfinder"

In the context of constant skills development we designed and successfully implemented for the second year the "Pathfinder" program. This is a personal development training program aiming to help the people of WIND discover paths to self-improvement and growth in a way that will have a positive impact and contribute to the success of WIND. To date, 292 employees attended 3 full-day interactive training sessions.

"Re-Think!"

Re-Think training program is being implemented since 2016! Employees from many different departments, through day-long training and in Action Learning meetings, are becoming even more effective in:

- Forming the appropriate "mix" of talent in their team so as to free its full potential
- Identifying the challenges with greater clarity and guide by posing good questions
- Providing the conditions that reinforce creative thought and team contribution.

"Customer Contact: We raise up along with our customers"

Holistic service and the creation of an amazing customer experience is our key strategic goal. In this context, we designed and implemented an interactive "Customer Contact: We raise up along with our customers" program for employees in the customer service department, emphasizing how we can better explore the real needs and expectations of our customers.

“Evolving - Mentoring Youth” program

For the 4th year in a row, we encouraged voluntary participation in youth mentoring programs that give our employees the opportunity to evolve their leadership skills and to have a different development experience. In this context, our executives participated in the following programs:

“Future Leaders”

We are continuing our collaboration with the Future Leaders organization, whose goal is to support NGOs with the contribution of experienced executives in the development of business plans and their practices. To date, 13 executives of our company have participated in the program.

“Job Pairs”

We were the first company to support the “Job Pairs” program; a voluntary initiative that connects executives and professionals with university alumni that want to start their career in the respective field / profession. To date, 31 of our Company officers from different specialties have participated as mentors.

Active Presence at Conferences & Universities

With the same consistency and interest, we continue to support and be present to actions aimed at young people and create opportunities for their interconnection with the business community. Among other things, such action is the Panorama of Entrepreneurship, in which we participate with keynote speakers and through Business Days, where young people come in contact with the Company in the most interactive way and spend a whole day at our premises.

At the same time, in an effort to link the academic community and education to the labor market, we reward excellence and effort by honoring each year the distinguished students of the Postgraduate Studies Program “Economics and Business Strategy” of the University of Piraeus and offering them internships for obtaining professional experience.

A glimpse at the outside world!

An important part of the development of WIND Hellas employees is their encouragement to participate in conferences and workshops which is implemented through Grow@WIND’s annual development process where all development activities are agreed and recorded. Thus, in 2017, 120 colleagues participated in 42 conferences in 15 cities with a total of 1,433 training hours.

At the same time, through internal communication, they are encouraged, by participating, to secure a place in important training actions in which WIND is a supporter or sponsor (e.g. TEDx Academy, Enterprise Panorama) and further develop their wider knowledge.

Internal Training Programs

Once more we took the initiative and organized various internal training sessions, diffusing knowledge to our colleagues. Indicatively, we mention the seminars. VMware 6.0 - Concepts and Administration, WS Accreditation Training, EMC networker 9.1 administration and maintenance, Business Customer configuration & support issues. By these actions 530 hours of training have been completed covering the educational needs of various groups.

Interactive Platform E-Learning

Starting in 2016, we have integrated interactive e-learning programs to develop our skills, with 1,057 colleagues attending a total of 3,491 training hours. Courses can be taken from work or home and there is flexibility in terms of hours and days of attendance.

Managing Talent & Succession Planning

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

Attracting Candidates Internal Candidate Recruitment

We want WIND employees to be encouraged to explore development opportunities in other teams of the Company. Thus, when there is a need to fill an open post, we first look among our own people as the best source of qualified candidates. Our purpose is to offer employees the opportunity to acquire knowledge, personal growth and professional development. Within the year, 9% WIND Hellas employees took an important step of advancement by being promoted, changing tasks or being moved.

2017

SUSTAINABILITY REPORT

External Candidate Recruitment

In October 2015, our Company has implemented two "WIND Young Talents - Graduate Trainee Programs", a program whereby 20 University new graduates with a Postgraduate degree, talent and will joined the WIND family. Those young people accepted the invitation to "show that they've got it", participated through the interactive microsite of the program, stood out through the selection process (online serious play, evaluation centers, interviews) and were eventually recruited on an open-ended contract. After completing two months at the Company, exploring in the most interactive way the basic points of contact of WIND with its customers (call centers and the WIND Stores), they were incorporated into their original working groups. For 16 months, through the rotation process, which is a key feature of the program, they were hosted and supported more than 20 different working groups, while at the same time they gained knowledge of many subjects and an overall picture of the whole organization within a short period of time.

At the end of 2017, young talents of the second round prepared for their second rotation in the working groups that will welcome them and young talents of the first round are now being developed into the teams that have "won" them and evolve into dynamic professionals. The rotations of young talents of the second cycle are expected to be completed in 2018, while the third cycle is planned to begin in 2019.

In addition, WIND Hellas supports and participates in multiple career days with the aim of attracting candidates, informing them about opportunities for work and development at WIND, and also highlighting the Company's image as an employer. In 2016 we participated in Career Days in Athens and Thessaloniki (Career Days & Sales Day of kariera.gr, Job Festival from Skywalker), while giving employees the opportunity to participate in it, interacting with the outside audience and presenting the Company in their own role. At the same time, we made a significant presence in the Greek Universities career days (Athens Economic University Career Days, Career Days@Deree College) attracting a considerable number of candidates.

Corporate Induction Programs

Since 2014, we have been holding the program Welcome OnBoard, for new hires in all departments of the Company. Our goal is for new hires to become familiar with the operations and the way we work at WIND Hellas, in a simple, interactive and effective way.



Two-way Communication

At WIND Hellas, we utilize modern internal communication media, informing employees on issues of direct concern.

Some of the methods and communication channels of open and constructive dialogue that we use are surveys, workshops, meetings with the management team, awareness sessions, upgraded internal communications and articles at WIND News Blog, the new digital communication channel as part of our Company's Digital Transformation, but also content in the internal Intranet. In fact, with regard to the latter, its content was significantly cleaned out in 2017, important functions were improved, such as search, and useful content was added, such as News of the Day, which involves citing corporate news regarding our Company as presented in the media. Finally, it is worth mentioning that, in special circumstances, special microsites are also created for internal use in order to provide adequate information and guidance to our colleagues (e.g. "euWIND" Festival microsite).

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WIND

Me@WIND

Our effort for simplicity in data management and the immediate and easy access to information for everyone is supported by the new platform HR Self Service «Me@WIND. This new (web based) technology is dynamic enabling it to evolve and constantly be upgraded; offering access to all information with direct concern to employees, as well as to give the line managers easy and fast tools to manage their team. Our new platform was launched at the beginning of 2016, and is gradually hosting even more of our Company's people management procedures all the time.

Employee Opinion Surveys

Participation in the survey increases each year and for the last survey in 2016 it reached 85% of all employees. The high participation rate gives a credible image of the organization, as well as the commitment of WIND employees to always improve the Company.

It is worth noting that for the first time WIND people have participated in the internationally recognized Great Place to Work institution in order to get useful feedback for our development so far and to plan even further our next steps and have managed to promote our Company in the 12th in the category of large companies (251 employees and over). That recognition of WIND is the result of the continuous transformation of our Company, in an environment dominated by will, teamwork, creativity and inspiration. Lastly, our practices, which were included in the culture audit, were recognized as similar to large those of the large multinational corporations, giving us the 2nd position in the ranking.

Based on the results of the survey, annual action plans are planned at team and company level, in order for WIND Hellas to be a leading work environment. Throughout 2017, and after the entire organization was informed of the very positive results of the survey, meetings of all groups were held, and the major areas for improvement and action plans were designed.

“Open the WINDows” Workshop for Senior Executives

Four years after the workshop “Fresh WIND to All!”, held in February 2013 at Sofiko, Korinthia, for our Company’s senior executives, and as part of the continuous development of WIND culture, the team met again in Marathon for a two-day workshop. The goal was to agree on commitments and plans that will lead WIND in the new era, making the best possible use of the potential of all Company employees and the opportunities opened up through interdepartmental cooperation.

Through interactive sessions and pleasant group activities, a robust framework has been created with ideas and actions that are the basis and inspiration to do our best everyday. These actions were presented to the WIND Management Team and, with specific actions, have already begun to be realised and embraced by the whole organization.

Awareness Sessions

These are ad hoc information sessions held each time the need arises to inform our employees on issues concerning new policies, procedures, methods and work tools, as well as on significant developments concerning our Company. So far 9 meetings with different themes have been held (e.g. development of our 4G Network, forms of harassment in the working environment, competition law, group life plan and healthcare).

Lastly, as part of the Customer Experience Transformation initiative, and given that the formation of an amazing customer experience is a matter for all WIND employees, in 2017 daily Customer Experience workshops were designed and implemented, attended by employees from all departments of our Company. The aim of the interactive program was to encourage us to assess the impact each of us has on the service chain and give us the opportunity to identify changes that will lead to even better experience of our customers. Throughout 2018, the last workshops will take place in our offices inside and outside of Athens so that all our employees will show their new side, which is even more focused on the excellent service of the internal and external customers.

Focus on the Customer

For the 5th consecutive year we have been implementing the We Listen to the Customer program, which is now part of the Customer Experience Transformation umbrella.

In 2017, 2 cycles took place, increasing the total participation by 15 percentage points. In total, after 11 cycles, participation has reached about 500 colleagues, both young and with many years of experience in the Company, from all functional groups.

The goal is still for all of us to participate listening to our customers with our presence at the stores and other sales and service points of contact of our Company and to propose ideas to improve their experience.

Digital Transformation

In 2017, on the occasion of our digital transformation actions, we have installed systems/platforms that provide us with modern capabilities that simplify and make our day-to-day work more efficient. These new tools exploit the capabilities of cloud computing, empowering users, offering flexibility, instant and two-way communication, new forms of collaboration.

Volunteerism - Social Contribution

Our social policy begins with our employees, who participate in various social responsibility actions, which are addressed to vulnerable social groups that need support as well as to the environment.

Charity Bazaar

Each year, as Easter and Christmas festivities approach, we have the pleasure of hosting charity bazaar from NGOs at our offices, thus supporting their valuable work. Thus, in 2017, we, at WIND Hellas, have made our festive purchases supporting ELEPAP and Make A Wish!

An “euWIND” year!

In 2016, with the voluntary participation of all our colleagues, we designed and implemented a program of activities and wellness for all WIND employees. Yoga, self-defense, soccer and basketball championships, the “euWIND” band, as well as organizing anti-smoking sessions shaped the 1st “euWIND” cycle of activities.

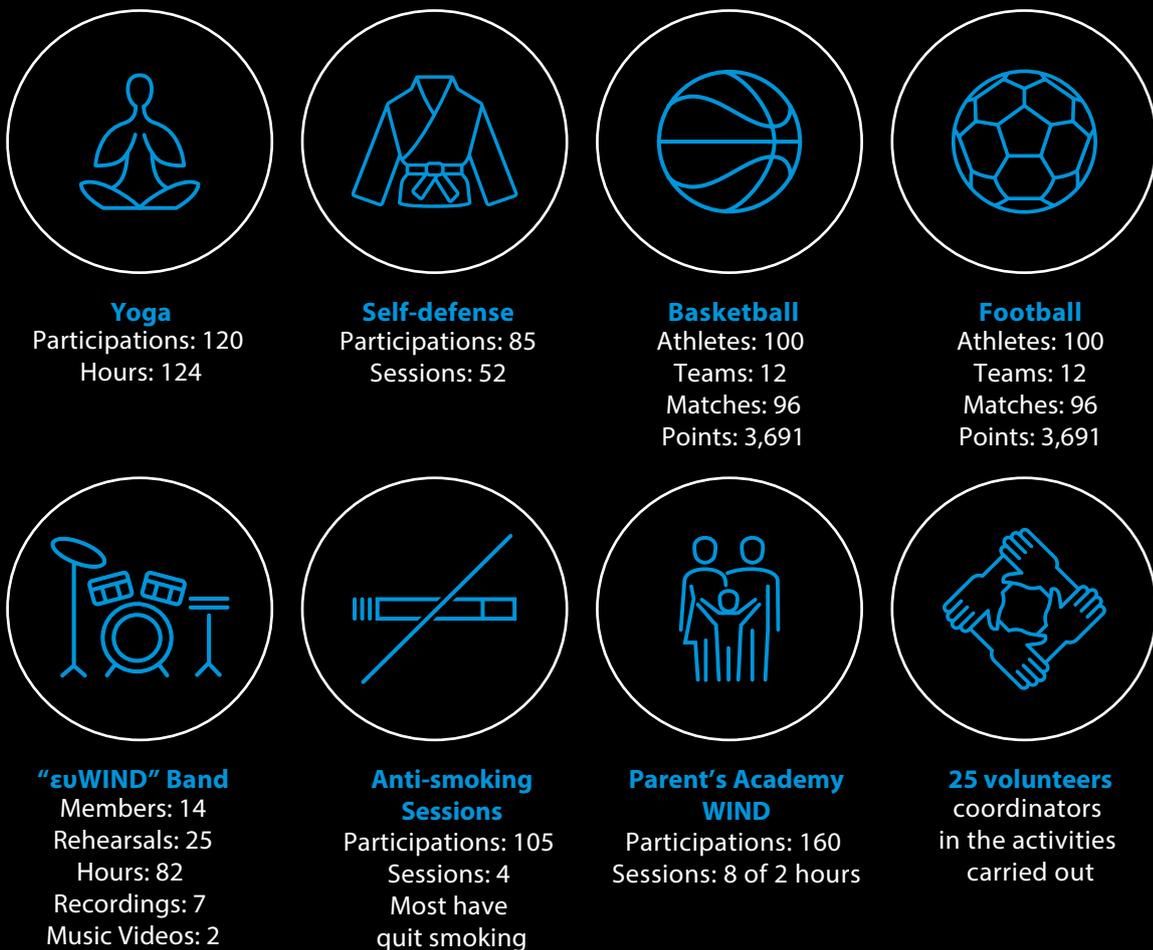
Throughout 2017 the actions continued with the addition of the Parents Academy, an initiative addressed to colleagues - parents, covering important issues concerning them. More specifically, the first round went into a theme on children aged 4 to 12, while the second cycle was designed to be launched in 2018 and cover topics related to adolescents. Thus, with 7 different activities being part of the everyday life of about 450 employees, but also with the participation and coordination of 25 volunteer employees, the first year of “euWIND” was completed and gave its baton to a second, promising year.

1st “euWIND” Festival

With the message “We show everything we are” we left the office and became a big group and enjoyed a special Sunday in nature at the 1st “euWIND” Festival, which was the peak of the first year of “euWIND” activities. More than 1,200 participants, from all our facilities, gathered together with our loved ones just outside the city, at Sports Village Athitaki, Grammatiko, where the soccer and basketball finals of the Company’s championships took place, including yoga and self-defense sessions, but also the exciting live of “euWIND” Band, the WIND employees’ band!

Employees also had the opportunity to test their skills in archery, beach volleyball, ping pong but also enjoy a bicycle ride in nature. Everyone enjoyed the good weather, participated in the impressive games that stole the show, such as flying fox, climbing, bungee trampolines, segway robbins and inflatable balls of balance and of course did not miss the dives in the pool. The day ended with the awards ceremony, where the Company’s Management Team honored Volunteers, as well as those who excelled in championships and tournaments. In terms of music, beyond the first and very successful live performance of “euWIND” Band, the event featured the rock n roll sound from Johnny Vavouras & the Cadillacs with the brilliant Eva Tsachra, in a big day presented by Panagiotis Chatzidakis.

450 UNIQUE “euWIND” PARTICIPATIONS IN TOTAL



Employee Blood Bank - Voluntary Blood Donation Program

This is one of our most important initiatives that was started in 2002 and since then is implemented twice a year. Since 2002 and to date, the Blood Bank counts 1,199 voluntary blood donations. In 2017, the Blood Bank covered the needs of 43 people (employees and their families) with 63 units of blood.

Employee Events

Traditionally, with various scheduled and unplanned occasions, we manage to come from all parts of Greece and experience beautiful moments. Thus, in 2017, we did not miss a chance to have fun just like we do at WIND Hellas!

Tsiknopempti

Taking advantage of the tradition of Tsiknopempti for the 2nd year, we gathered in and out of the restaurants of our premises and enjoyed a rich meal ... straight from the barbecue! Confetti and carnival music was part of our lunch, while dressed up colleagues gave an even more festive touch to the event!

Creative Workshops and theatrical performances for our little friends

At WIND Hellas our little friends are looking forward to the celebrations that are always accompanied by small surprises. Thus, in 2017, we have collaborated with the Hellenic Cosmos, the Glass Musical Theater and other smaller theaters in Athens and Thessaloniki and have offered to our employees interesting and creative choices to enjoy with their children on Easter and Christmas.

A Healthy Breakfast for Everyone!

One year after the launch of the questionnaire that gave flesh and blood to the "euWIND" health and wellness program, our colleagues received an unexpected invitation to meet at the entrances of our premises and enjoy a healthy breakfast while being informed of the high nutritional value and the beneficial potential of fruits and cereals.

Traveling to Sikinos

Shortly before we said goodbye to 2017, we went into Christmas mood, offered traditional sweets and exchanged wishes that traveled far. Thus, from our offices, we have also become a part of our Company's great initiative to provide communication to Sikinos, sending our warmest wishes for a new, carefree year full of optimism and smiles to its residents.

2017

SUSTAINABILITY REPORT



External Candidate Recruitment



Grow@WIND Line Managers Workshop



WIND Young Talents



Parents' Academy



1st "euWIND" Festival



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WIND



Tsiknopempti



A Healthy Breakfast for Everyone!



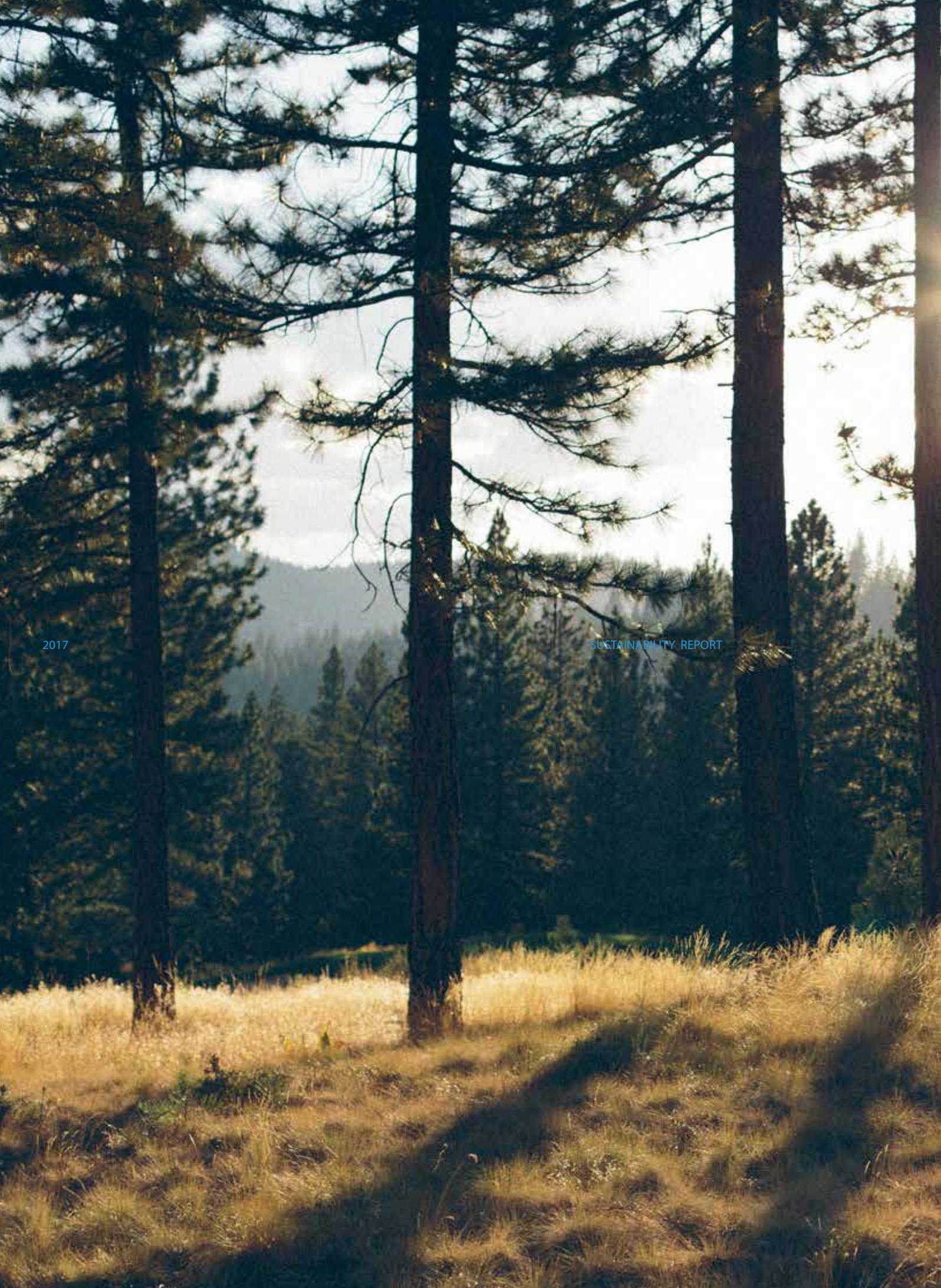
We listen to the customer

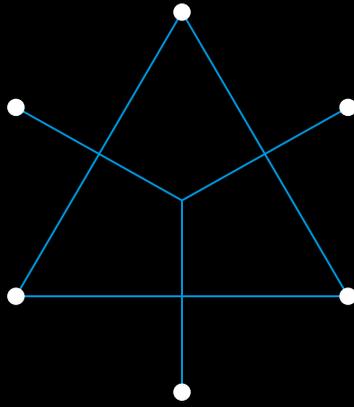


Open the WINDows



Employee Blood Bank





ENVIRONMENT →

We minimize our environmental footprint

2017

SUSTAINABILITY REPORT

07



We systematically pursue the smallest possible impact from our activity on the environment, emphasizing on preventing pollution, reducing energy consumption, environmental compliance and raising awareness on the protection of environment.



At a glance

2,170,253^{KWH}



REDUCTION OF ENERGY
CONSUMPTION FROM PROJECTS IN
BUILDINGS AND EQUIPMENT.

9.27^{tn}



SAVING PAPER FROM USING E-BILL.





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WIND

Environmental Management

WIND's activities have an impact on the environment in several ways. We control and manage the consequences we cause through the implementation of a certified environmental management system under ISO14001, with the aim of eliminating or minimizing the impact of our operation.



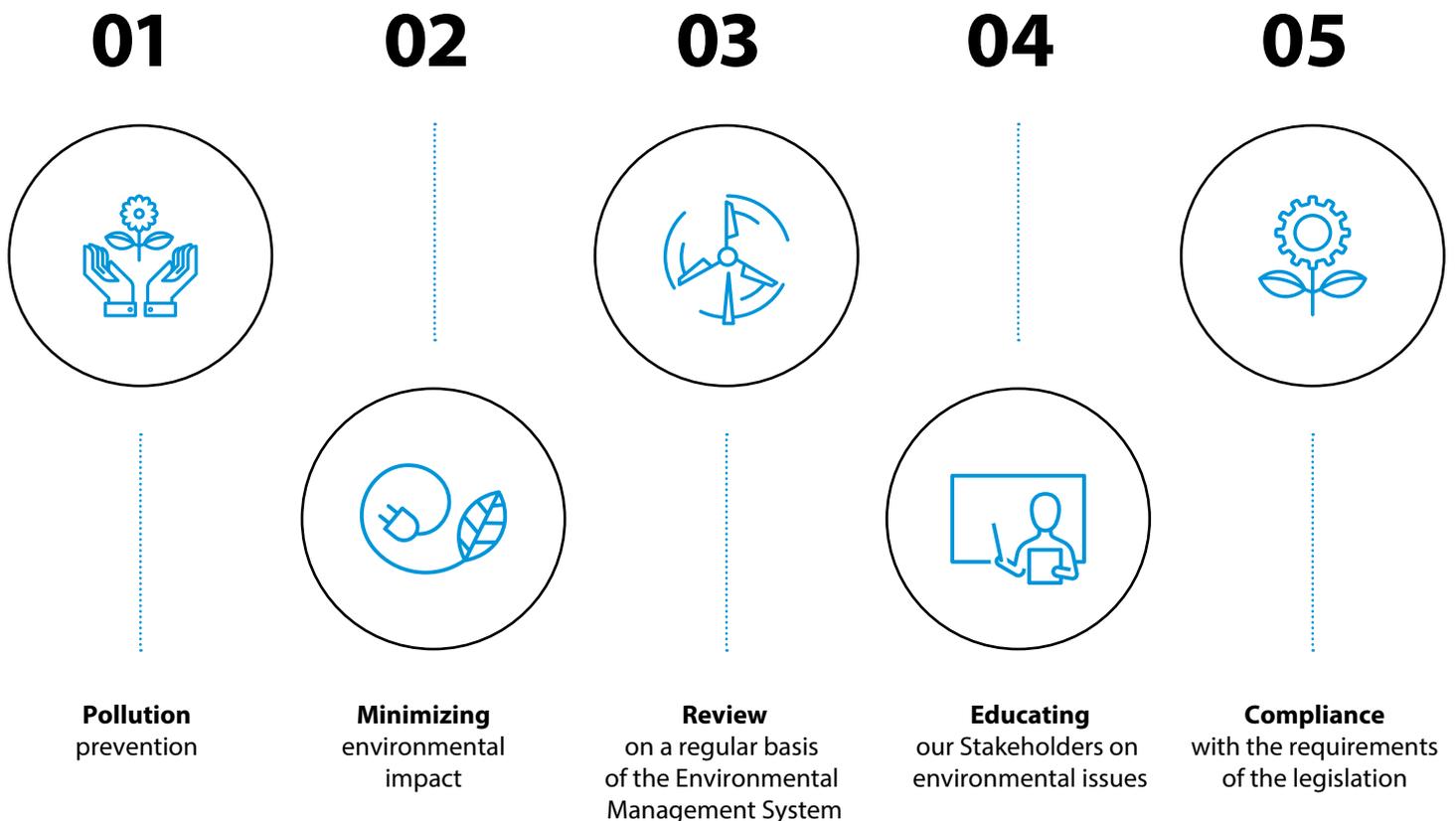
The evaluation of impacts is reviewed on a regular basis so as to ensure we are up to date and aligned with new circumstances and requirements. The significant impacts from our operations are presented in Table 6.2

2017

SUSTAINABILITY REPORT

ENVIRONMENTAL MANAGEMENT SYSTEM

TABLE 6.2



SIGNIFICANT ENVIRONMENTAL IMPACT FROM OUR OPERATION

Subject	Environmental Impact	Response	Objective 2016	Result 2017
Energy Consumption	Depletion of natural resources, atmospheric pollution, contribution to climate change and atmospheric acidification.	Energy savings projects (equipment renewal, building interventions).	Separate energy savings projects and increase in energy efficiency.	Reduction in energy consumption from projects in buildings and equipment by ~ 2,170,253 kWh.
Waste emission	Depletion of natural resources, creation of pollution, landfill saturation	Actions targeting - Avoidance - Reduction - Reuse - Recycling of waste generated	Increase of registered subscribers to the electronic services My Wind / E-Bill.	Increase in paper savings due to the use of the e-Bill by 9,270kg, an increase of registered subscribers by 29,6%.
Electromagnetic emissions	Atmospheric pollution.	Environmental Impact Assessments, EM Energy Emissions Assessments, compliance with limits and standards set by Greek and EU legislation as well as international standards.	No limit overrun by individual base station ¹	There were no violations of limits (except antennae parks) in 2,250 measurements of the EEAE ²

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WIND

In 2017, expenses recorded as environmental protection costs, such as the maintenance of the ISO 14001-certified Environmental Management System and compliance with obligations under Law 2939/2001 on alternative waste management amounted to approximately €24,448.

Regarding fines and penalties for non-compliance with environmental legislation, there were no relevant significant financial or non-financial penalties in 2017.

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

² http://eeae.gr/files/anakoineseis/EEAE_EMF_report_2017.pdf

Climate, Energy and Energy Management

The consumption of energy and the impact it causes to the environment is especially important for WIND.

We constantly examine ways to reduce energy consumption and to increase energy efficiency by working and adapting equipment and buildings, in line with the major efforts done at national, European and international level (e.g. the EU's 20-20-20 Goals, and more recently 27-27-40 by 2030, as well as Goals 7 and 13 of the UN Sustainable Development Goals). At the same time we monitor the air pollution emissions direct and indirect (translated to equivalent carbon dioxide).

Total energy consumption

The majority of the energy we consume is electricity, but we also use diesel, fuel oil, and gasoline for vehicles. The total energy we recorded in 2017 amounted to 358,669 GJ, including fleet fuel³. The electricity we consumed reached 312,088 GJ increased by 24,977 GJ compared to 2016 or around 7.5% due to the increased use of new technologies and data.

The efficiency of the energy used (energy intensity), expressed as units of consumed energy to total annual revenue in 2017 was 0.7149 GJ/k € reduced by 4.61%.

2017

SUSTAINABILITY REPORT

The energy we consume generates from non-renewable sources. However, we have installed and operate a limited number of RES (8 PV of 900 W capacity) in hybrid electric generating sets.

In 2017 we estimate that these systems produced about an average of 1,640 of energy each.

In 2016 we completed or launched new energy-saving projects in selected buildings and equipment.

In 2017 we continued our energy-saving efforts in buildings and individual spaces. We have completed:

- The Energy Data Center upgrading with full air-space replacement.

Result: Reduced PUE by 12.32% compared to the initial state and by 7.5% compared to a usual data centre of equivalent category⁴

- The replacement of old air conditioners in large buildings with data centers.

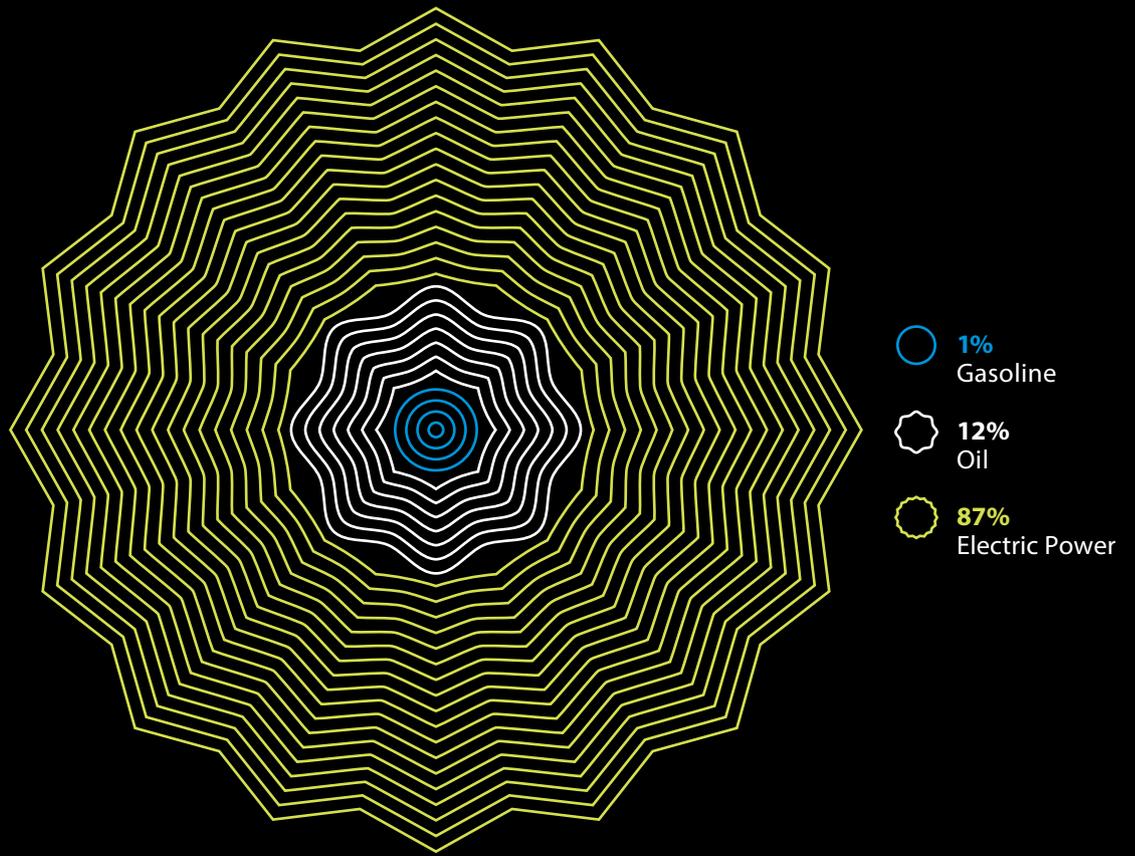
- The ongoing spatial and operational reorganization/redistribution of telecommunications and IT equipment aiming at using less physical space for the same equipment and increasing efficiency of the backup equipment.

Overall, in all telecommunication buildings there was a decrease in consumption by 2,170 MWh or 7,813 GJ in 2017, or 9% of the total building consumption.

In addition, our aim for 2018 is to design and implement an ISO50001 energy management system in all our buildings, aiming at our continuous improvement in this important sector for our industry and beyond. For the grid network, energy audits are planned using appropriate metering equipment on a sample of installations from all climatic zones in the country to draw conclusions on the energy efficiency of the grid, as well as to design targeted actions to contain the expected increasing energy consumption on our network, as a result of new technologies and increased use of our online services.

³ Excluding our chain of stores. Please note that prices have been recalculated on a yearly basis for the past three years.

⁴ "Localized" category pursuant to the Berkeley Lab report entitled "<https://eta.lbl.gov/publications/united-states-data-center-energy>" US Data Centre Energy Usage Report 2016, p. 31

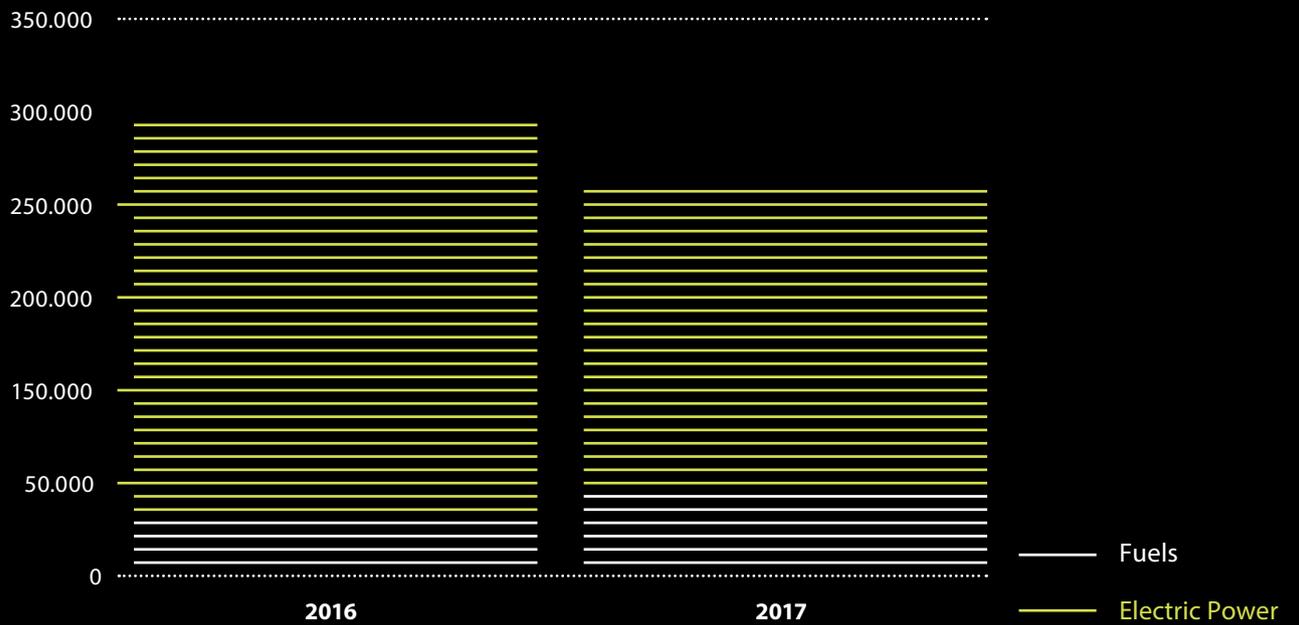


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WIND

ENERGY CONSUMPTION DISTRIBUTION 2016-2017 (GJ)

FIGURE 7.2



Fuel Consumption

All fuel we use comes from non-renewable sources.

A significant part of the energy used from fossil fuels is intended for electricity production or backup in case of the interruption of electricity at installations / points of presence of the network. To reduce the fuel used for electricity production at remote base stations we designed and completed a project involving the replacement of generators with hybrid systems, marking significant savings in consumption.

Even after the implementation of the above project, most of all fossil fuels consumed in 2017 concerns the use of generators for electricity production. The rest was consumed for heating of buildings and the vehicle fleet. As a result of the actions to increase the efficiency and savings in fuel from the use of hybrid systems for electricity production at Base Stations, the replacement of the vehicle fleet with new with clearly improved consumption per 100km, etc., we saw a gradual reduction in energy from the use of fuel in the last 6 years with the reduction at almost 70%.

Vehicle fleet

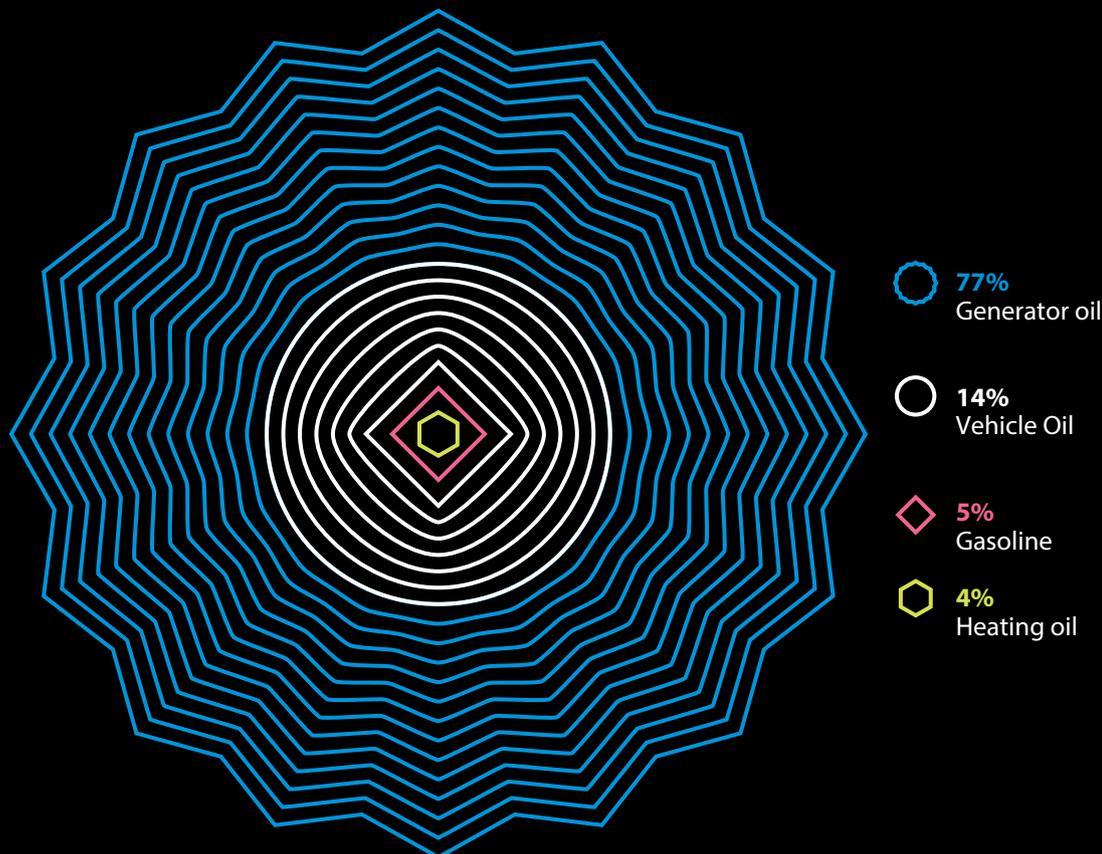
With respect to the corporate vehicle fleet, these consumed in total 245,160 liters of fuel, of which approximately 23,7% was unleaded gasoline and the remaining was diesel. Consumption per vehicle (annual) stood at 1,377 liters, remaining at the same level as in 2016 (1,369 liters). The total emissions from the fleet for 2016 was 624.27 tonnes CO₂e⁵.

In addition, we operate a private bus to connect our largest building to the nearest metro station, thus promoting the use of public transit.

5. Emissions were calculated using the calculation tool of the Greenhouse Gas Protocol "World Resources Institute (2015). GHG Protocol tool for mobile combustion. Version 2.6".

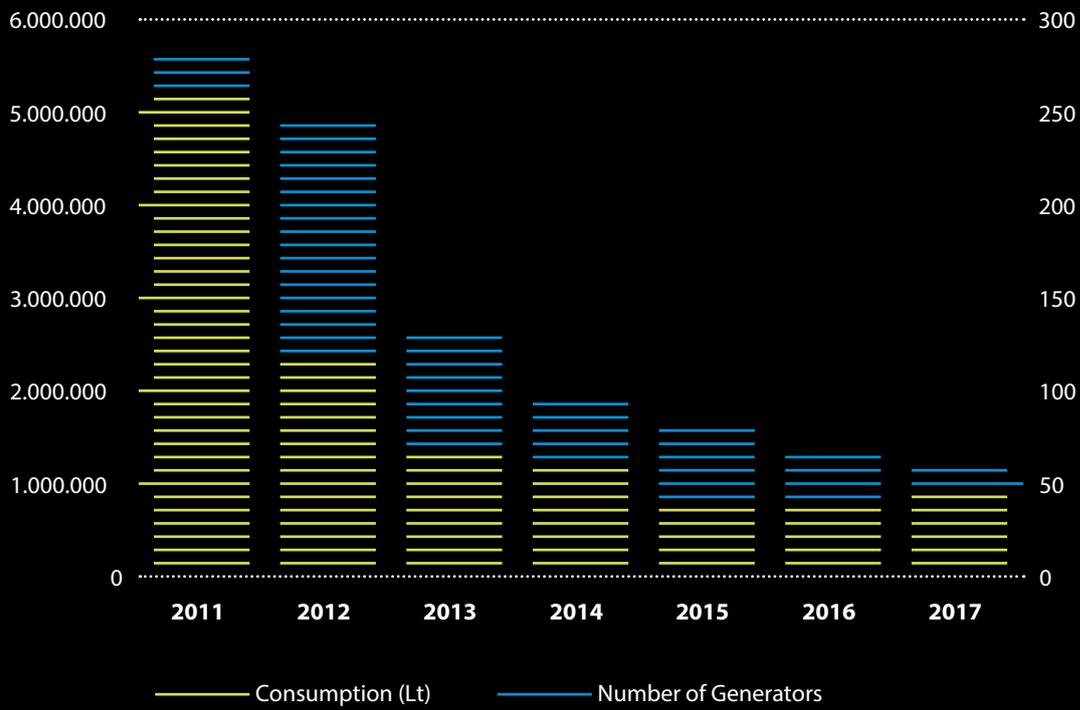
ENERGY CONSUMPTION - USE OF FOSSIL FUELS (%) 2017

FIGURE 7.5



2011-2017 TOTAL ENERGY CONSUMPTION FROM FUEL (GJ) AND EMISSIONS 2 (CO₂e)

FIGURE 7.4

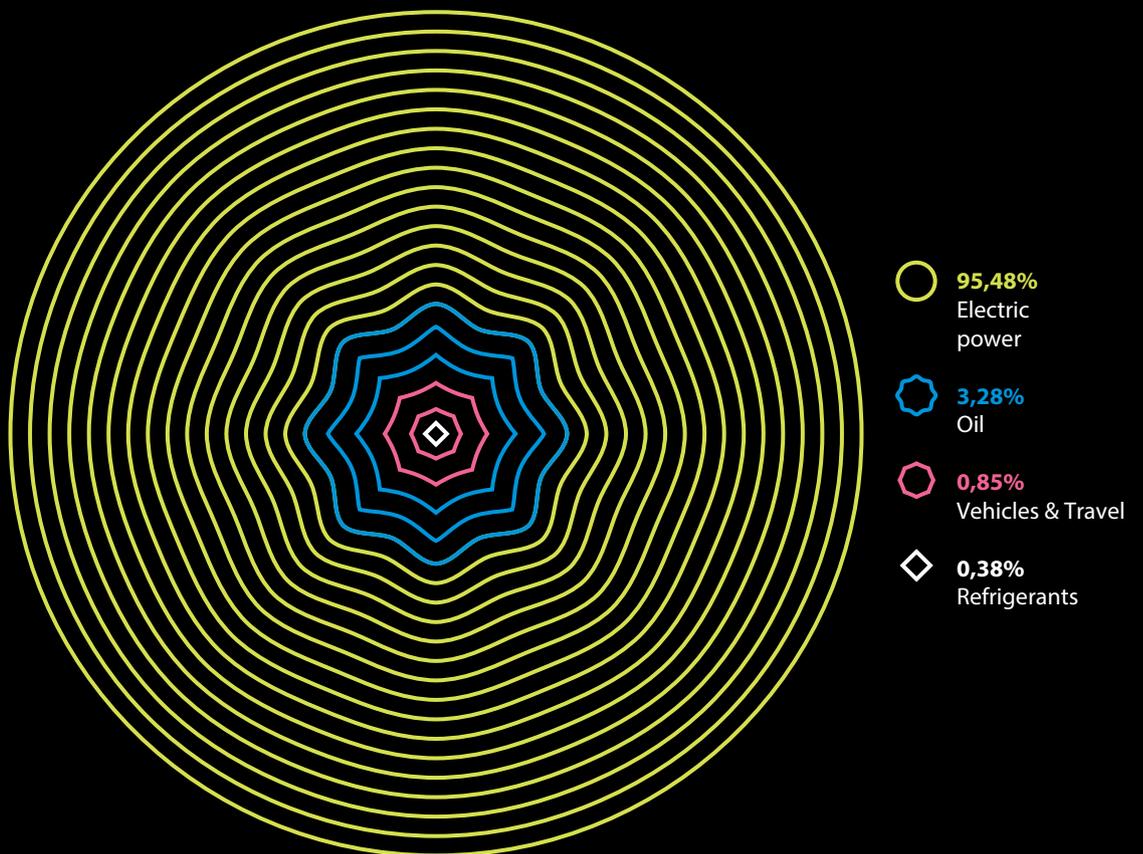


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WIND

DISTRIBUTION OF POLLUTANTS EMISSIONS BY SOURCE (%) 2017

FIGURE 7.5



Emissions

Pollutants emissions amounted to 86,256 tonnes of equivalent carbon dioxide, marking an increase by 5.5% compared to 2016.

To calculate the emissions we used the guideline of the World Resources Institute⁶. Excepted are the emissions from the electricity consumption for which we use the average conversion factor of PPC S.A.. In 2017, we re-adjusted the average conversion factor for electricity by issuing a new conversion factor (1.05 kg / kWh⁷). To better compare the annual performance data, in Figure 6 we have recalculated all indirect emissions from the supply of electricity with this index.

Ozone Depleting Substances (ODS)

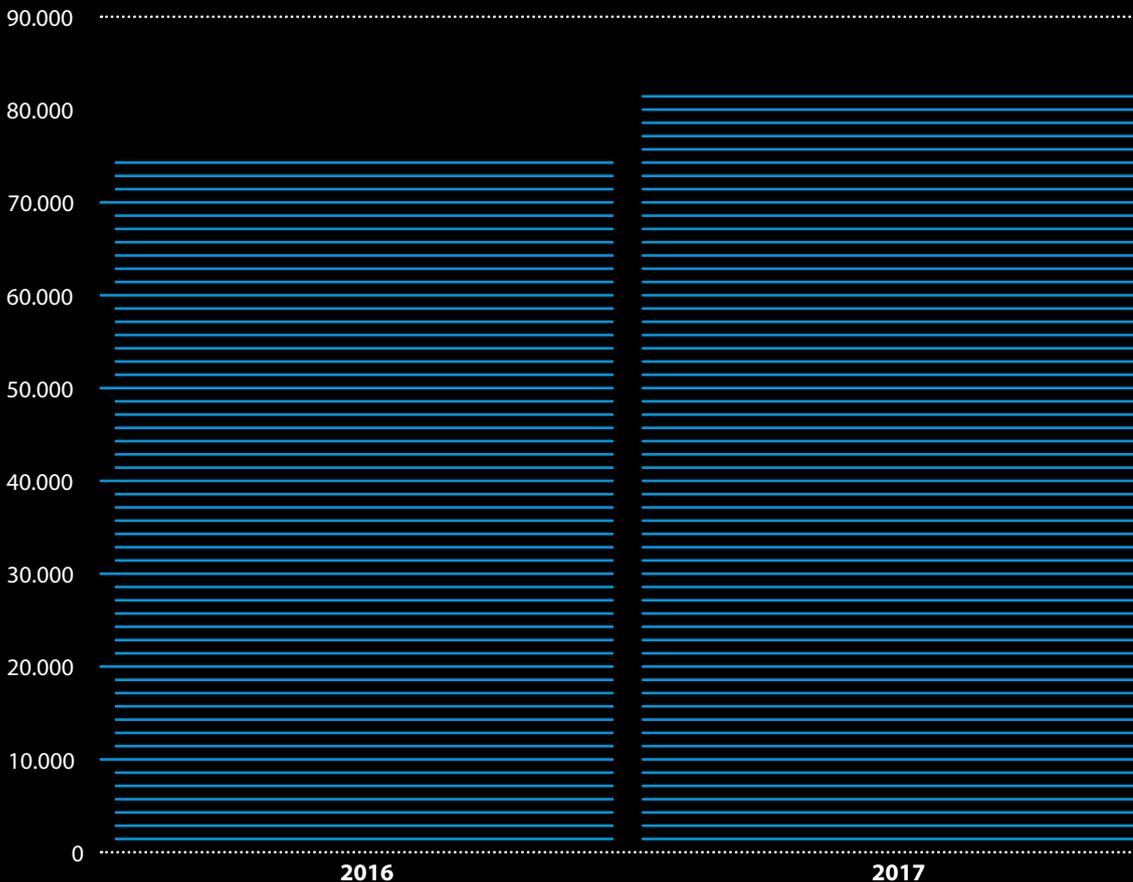
Ozone depleting substances result from the operation of air conditioning units. Considering that the quantity in the circuit of each machine can potentially leak into the environment, we estimate this quantity as air pollution. To calculate the pollution, we use data of the IPCC (Intergovernmental Panel for Climate Change⁸).

To reduce the pollution from this category, we are replacing our old air conditioning units with newer ones, which present fewer breakdowns and leaks and we use refrigerants with zero ODP. Also, we check our units on a monthly basis.

The total burden for 2017 due to leaks was 331 tn CO₂e.

POLLUTANTS EMISSIONS (TNCO₂e) 2016-2017 / EL. POWER

FIGURE 7.6



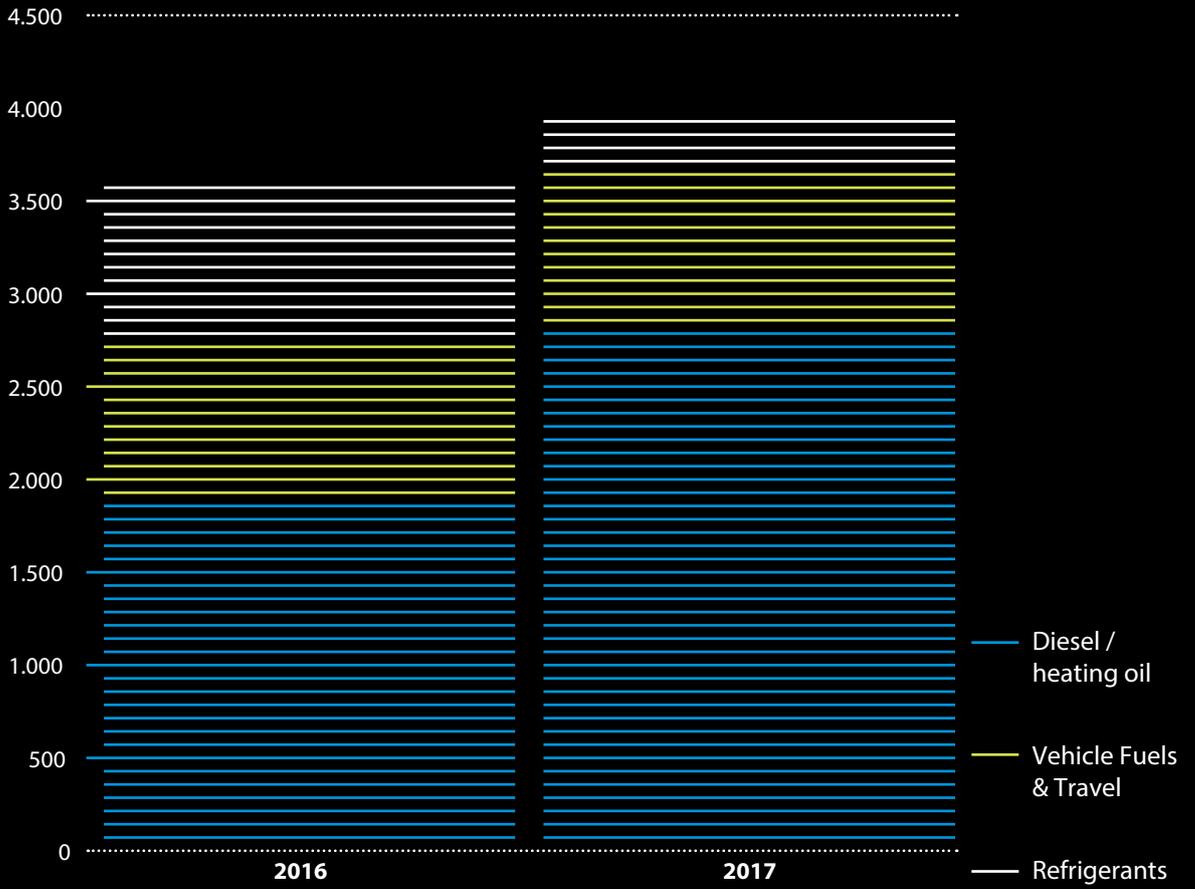
6. <http://www.ghgprotocol.org/calculation-tools/all-tools> World Resources Institute 2008: GHG Protocol Tool for Stationary Combustion Version 4.1 (2015) and the respective GHG emissions from transport or mobile sources Version 2.6 (2015)

7. https://www.dei.gr/Documents2/%CE%95%CE%9A%CE%95/APOLOGISMOS%20DEH_2016_WEB_FINAL%20GR.pdf p. 70

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

POLLUTANTS EMISSIONS (TNCO_{2e}) 2016-2017 (NO EL. POWER)

FIGURE 7.7

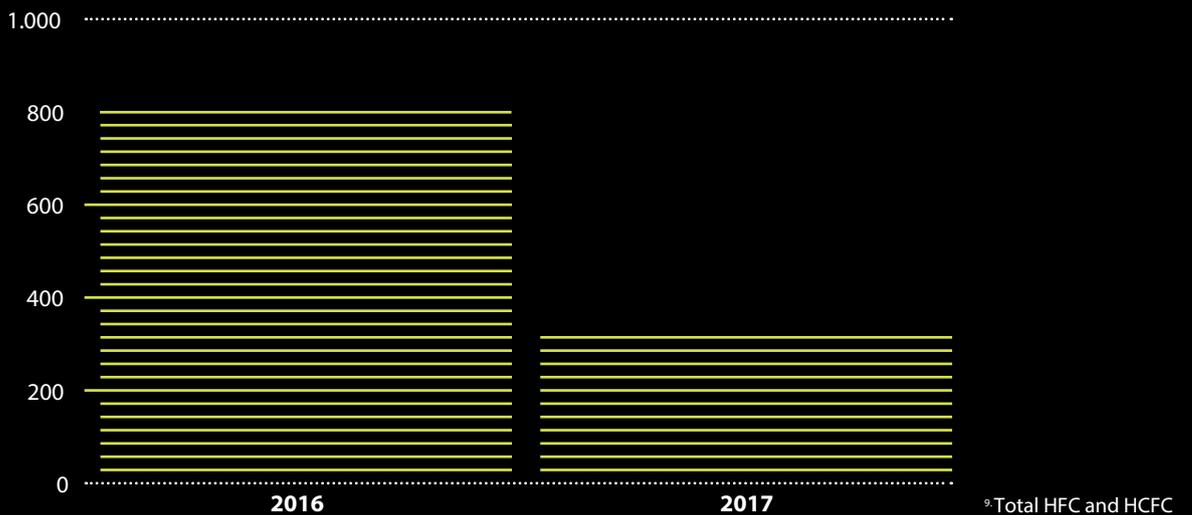


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WIND

2016-2017 EMISSIONS FROM REFRIGERANTS (TN CO_{2e})⁹

FIGURE 7.8



⁹Total HFC and HCFC

Electromagnetic Radiation

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

During the installation, operation and control of our network operation, we comply with all international safety standards as well as the guidelines of the Greek legislation. Specifically:

- We adhere to the strict exposure limits laid down by legislation as well as the international organizations.
- We cooperate with all local bodies when we build new base stations.
- We restrict public access to base stations to avoid inadvertent exposure
- We avoid the installation of base stations at locations that may potentially expose vulnerable groups of the population, such as schools, hospitals, day care centers etc.
- We advice public to be informed on this matter and only from the competent authorities, and the related information published by these authorities toward this purpose, such as:
 - Brochure on mobile telephony
 - Mobile Telephony and Health
 - World Health Organization (WHO) Newsletter
 - Websites of the Hellenic Observatory on E/M Fields with available measurement results on interactive maps

2017

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The body responsible for non-ionizing radiation is the Hellenic Atomic Energy Commission. Within the scope of its responsibilities it accepts requests and conducts of its own initiative radiation measurements on samples of base stations throughout the country, including communication providers, TV stations, etc.

In 2017, the EEAE conducted 2,250 measurements and did not find any violation of limits from base stations, with the exception of the so called “antennae parks” that also host base stations for mobile telephony, TV, radio transmission, TETRA base stations, radar etc., and any violation concerns cumulatively all emissions from all the above.

Waste Production & Management

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

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

The management of the vast majority is made by disposal to licensed recycling facilities through a network of partners and / or relevant collective management systems and only a small percentage is disposed to landfills.

We work with a number of waste management partners, whose licenses we check thoroughly before starting our collaboration, as well as with Collective Management Systems, the relevant organizations that organize the collection, processing and recycling of specific types of waste, such as in the table below.

Collective System	Type of Waste
AFIS (Recycling of Portable Power Poles)	Small household type batteries
Recycling of Appliances S.A.	All types of electric and electronic equipment
Combatt S.A.	Industrial type batteries, accumulators
SY/DE.SYS. S.A.	Industrial type batteries, accumulators
E.P.EN.DI.SYS (Re-Battery)	Industrial type batteries, accumulators
Photocycling	Lighting equipment, light bulbs, light fixtures
Hellenic Recovery Recycling Corporation - EEAA	All product packaging

The production of waste in 2017 was 705,5 tonnes, compared to 966 tonnes in 2016. Please note that, since 2016, we have also been recording the excavation, construction and demolition waste, to which the great increase from 2015 onwards is due. Further, due to the given periodic scheduling of maintenance works and / or the implementation of projects at antennae systems and other installations (e.g. liquidation of file, replacement of furnishings due to renovations, liquidation of stored equipment no longer required) we observe significant annual fluctuations in the produced quantities of waste.

Hazardous / Non-Hazardous Waste

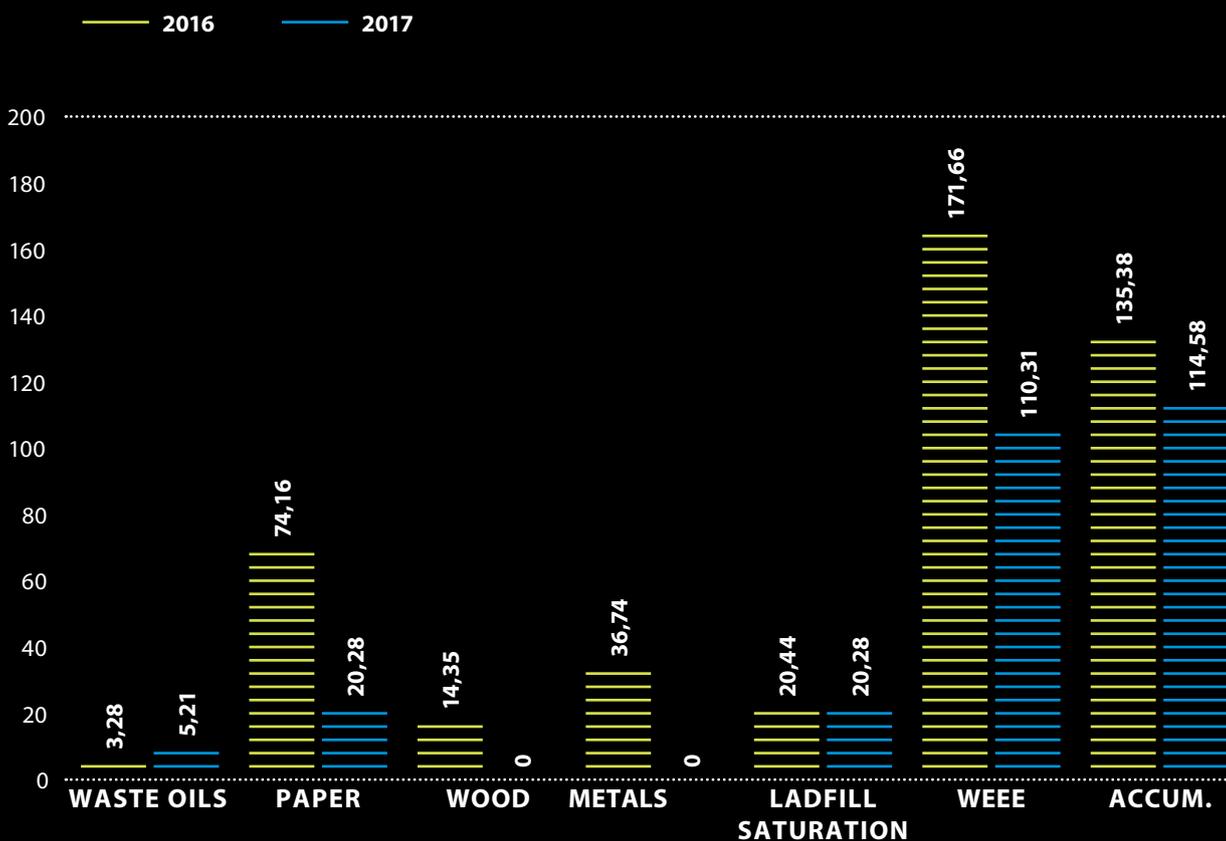
Waste production was greater in hazardous waste compared to non-hazardous waste, since the majority of produced waste is equipment (Waste Electrical & Electronic Equipment / WEEE), accumulators, batteries and lubricant waste, excluding construction waste. All hazardous waste is recycled with the help of qualified licensed partners. Approximately 40,5 tonnes of non-hazardous waste, excluding construction waste, were produced in 2017, consisting of recyclable non-hazardous materials (mainly paper) and the mixed urban type waste resulting from our operation and then disposed of to landfill sites. In sum, a total of 20 tonnes were shipped to landfill in 2017. We managed all waste produced within Greece.

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WIND

WASTE PRODUCTION 2016-2017 (IN TONNES)

FIGURE 7.11



Reduction in paper use

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

Internal environment

- Centrally programmed double-sided printing on all computers and the option for the shredding of documents, with an accompanying recycling program (bin at each printer, on each floor, in every building),
- Company website with the ability of exclusive electronic management of documents and procedures (no printing is required at any stage),
- Electronic issue of payroll,
- e-bill for all employees,
- Since 2016 we also apply an electronic system for managing employee evaluations, which significantly reduces the need for printing, and resulting in further paper savings of approximately 100 kilos of paper annually.

Stores - Partners - Suppliers

- Elimination of printing for certain documents where communication with the stores was made in printed format
- Electronic management of invoices
- Changing the printers in the stores to models that print on a smaller surface for specific documents
- Using digital signature.

Subscribers

- Providing e-bill / e-services to subscribers for easy, fast, secure, and non-paper account management, as well as other services from any device and accompanying actions to promote the use of the platform.

2017

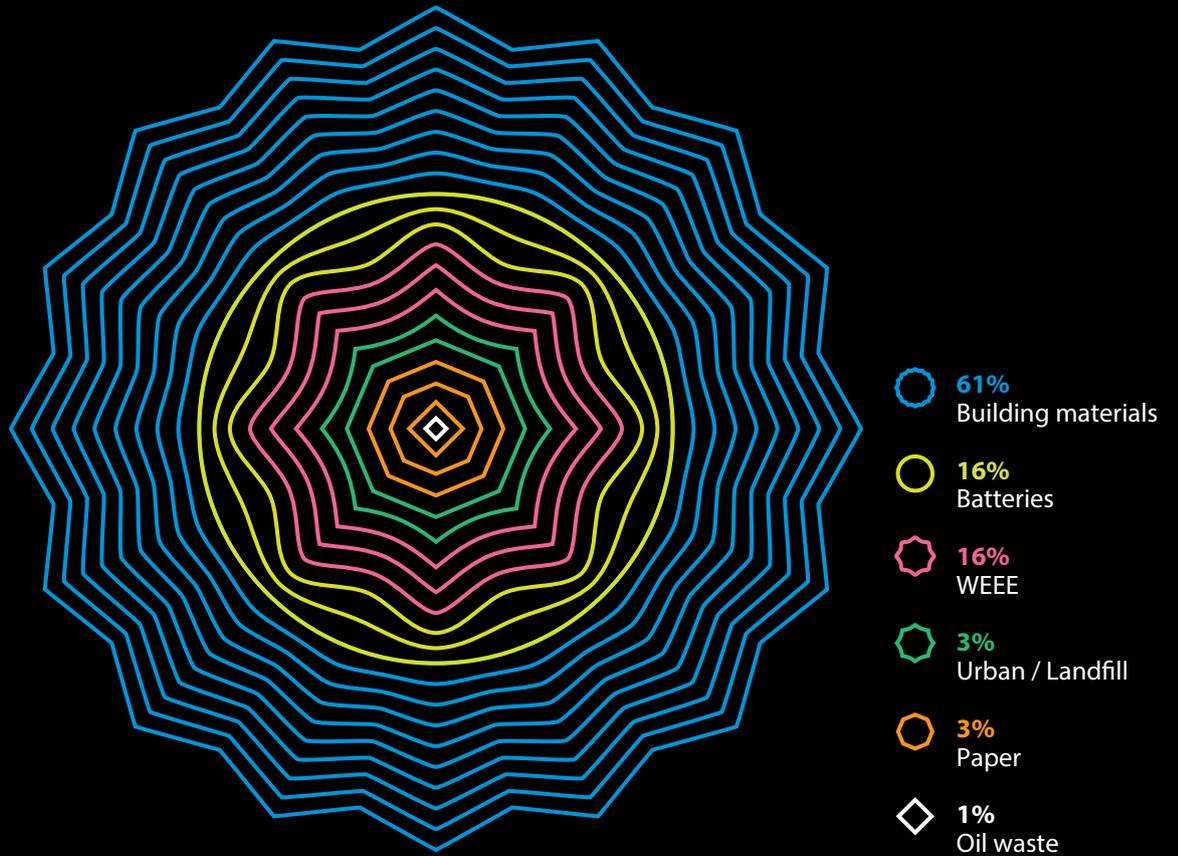
SUSTAINABILITY REPORT

- New digital store. New WIND stores offer a new, unique experience of technology and service to consumers, and a better environmental profile. They fully integrate the capabilities of digital technology and eliminate the use of paper and prints for display and advertising purposes to a large extent. Through interactive touch screens and special software, visitors explore and personalize their choices in Mobile, Fixed Telephony and Internet in every possible combination, without having to look for printed material, while removing the use of poster inside the store.

The results are equally important

- By using double-sided printing we achieved reduction in the use of paper which in the first year of implementation amounted to 600,000 sheets or the equivalent of 1,500 kilos of paper annually.
- By using the company website and electronic management of the 7 most used forms we save approximately 60,000-70,000 sheets of paper annually and the equivalent of approximately 300 kilos of paper.
- By changing various procedures concerning either the chain or the offices we save tens of thousands of sheets annually, weighing over 10 tonnes (9.5 tonnes result from the change in only one procedure).
- From the use of the e-bill in 2017 we saved approximately 45,9 tonnes of paper in one year. In recent years, consistent with our commitments, we are actively promoting our online services through the myWIND and myWINDAPP platform that allows our customers to connect and view their account or perform various actions (e.g. payments) through the dedicated application and from their mobile phone or the Internet, without the need to visit a shop and without a printed bill.
- Lastly, from our digital stores, we estimate that with the use of screens to view commercial information, we save around 150 tons of paper every year from non-printable brochures.

And within our environment, the paper consumption per worker indicator remained stable in 2017 at 4.26 packages per employee, that is less than half compared to 2008 when the indexing of this indicator began. In 2008 this index was 8.8. packs per employee.



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WIND

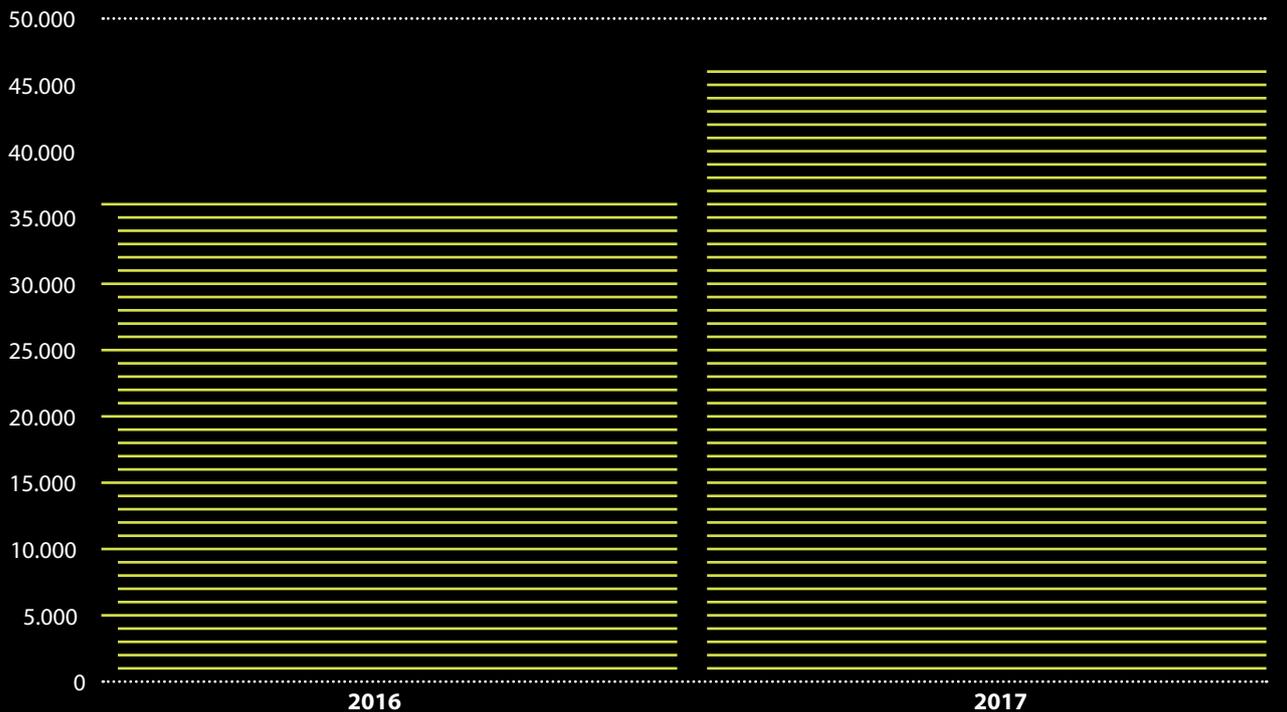
DISTRIBUTION BY DANGER

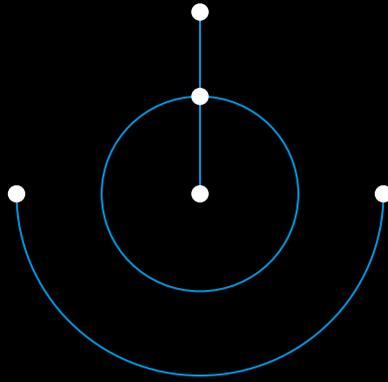
FIGURE 7.10



PAPER SAVINGS PER YEAR (KG) FROM THE USE OF THE E-BILL

FIGURE 7.11





MARKET →

We offer the best customer experience

2017

08

SUSTAINABILITY REPORT

We quickly and effectively adapt to the challenges of the market, guided by our commitment to our Customers for an excellent communication and service experience.

Our Customer experience is a strategic priority at all levels and in each activity at all contact points.

At a glance

81,7%



4G COVERAGE OVER POPULATION

6%



CUSTOMER INCREASE IN FIXED TELEPHONY

17%



INCREASE IN SMARTPHONE USERS

9



NEW TELECOMMUNICATIONS HUBS



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WIND

Our Approach



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

Customer Experience Transformation

The provision of an outstanding customer experience is a strategic priority of our Company in order to build stable relationships with loyal customers and diversify in the field of service in relation to competition.

For all of us in WIND, Customer Experience is based on two key pillars:

- Reliability: we eliminate the cases in which we require the Customer to contact us, especially for a problem.
- Pleasant Surprises: even where the Customers communicate with us, our goal is for us to be Unforgettable by offering them the opportunity to share their positive experiences with their people.

2017

SUSTAINABILITY REPORT

Customer Experience Transformation, that is the Company's global transformation program for excellence in Customer Experience, started in April 2017 and revolves around the establishment of specific and measurable goals and the ongoing implementation of actions to improve customer experience across the range of Company functions.

For the implementation of that program, working groups have been set up in areas of great importance, such as customer service, sales, accounts, fixed telephony services, corporate clients and communication. Each working group is designed to analyze in depth the potential problems faced by our Customers and then design and implement a range of improvement actions.

One major transformation program, such as Customer Experience, is accompanied by specific educational and communication activities to establish a customer-centric culture within the Company and to enter into a virtuous circle of continuous improvement by changing our processes and the way we work together.

Below are some indicative numbers that highlight the amount of effort that is being made in the context of Customer Experience transformation.

- More than 60 people directly involved in the main improvement actions and monitoring of the relevant performance indicators (CX KPIs), numbering over 550.
- 6 working groups from different departments, which focus on solving the main problems related to the experience of our Customers.
- More than 140 actions and over 550 related activities have been identified and are either in the planning or implementation phase.
- Over 50 IT projects to be implemented.

Our new digital stores, our Call Center, broader business partnerships and online platforms are playing a key part in improving customer experience. Moreover, we have further simplified our programs and services, providing more user friendly but "responsible" products, affordable to our subscribers, focusing on their needs as well as the explosive growth of mobile data use.

In an even more demanding year we had systematic progress

in mobile telephony:	<ul style="list-style-type: none">• One in two individuals who are mobile contract customers enjoy the experience of W & W plus contracts, freeing the use of mobile Internet.• We maintained our share of active customers increasing by 7% the airtime.• We have increased smartphone users utilizing data services on our base by 17% and their average data usage by 46%.
in fixed telephony and the Internet:	<ul style="list-style-type: none">• We have become the first alternative provider to provide NGA wholesale services to other providers in our country from proprietary cabins.• We introduced the new WIND Fiber products at speeds of 100 and 200 Mbps.• We focused on strengthening the bundle products for Fixed - Mobile and Internet with triple play solutions, more than doubling the number of those subscribers.• We increased our base by 6%.• We expanded 9 telecommunication hubs, which now total 321 (174 with physical collocation and 147 with remote collocation), providing fixed telephony and Internet services to 77.5% of installed telephone lines.• We have increased our number of subscribers enjoying high Internet access speeds (50, 100 and 200 Mbps) by 50%.

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WIND

Training our partners

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

Educational programs take place either online or through an e-learning platform or live and involve new products and services, as well as skills development. During 2017, 8,563 training hours were spent for our partners' 1,377 professional sales and telephone support representatives.

1. Certification system for new and old sellers regarding WIND's sales methodology.
2. Training of Call Center Partners for Customer Support based on the "Train the Trainer" training program.
3. Personalized training programs.
4. E-Learning platform training with the following capabilities:
 - Virtual classrooms.
 - Live webinars.
 - Webinars.
 - On-line evaluation of knowledge through questionnaires.
5. Monthly sellers' training through questionnaires, sales scenarios and cross sell games.
6. Creating manuals for all products, services & systems and store inspectors.
7. On-the-job training.

WIND Sales Club

WIND Sales Club is the destination for all sales teams of the WIND retail stores: it is a place specially designed for networking information, entertainment and reward. Here we exchange ideas and opinions in real-time, share our experiences, suggest ideas and solutions to our everyday life, and keep up-to-date with all the latest WIND news. From a simple instant messaging platform, we've transformed it into a loyalty platform, which is the first of its kind in Greece. The system connects all sales representative through a network in the form of a social network but also rewards them, not by redeeming points. They instead introduce the notion of permanent reward at every level, with the privileges being raised accordingly.

Concurrently, we develop a loyalty level by using an instant messaging tool at corporate level.

The ultimate goal of the loyalty program is the reward and practical recognition of sales representatives. With WSC, we reward the contribution of every sales representative working at franchise partner level, ensuring an improved end-user's purchasing experience and the continued professional growth of the sales team members.

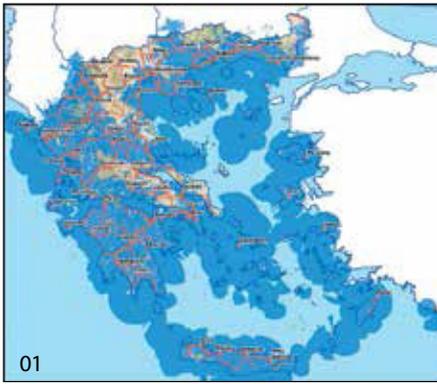
Users earn points by participating in the WIND Sales Club through interactive actions in an online environment including Live Chat at WSC Wall, information sections at WINDerful World and WINDepedia, as well as information on Contests running at the stores. WIND Sales Club numbers 790 members - members of the sales teams of the retail stores.

WIND Bank Blood Bank

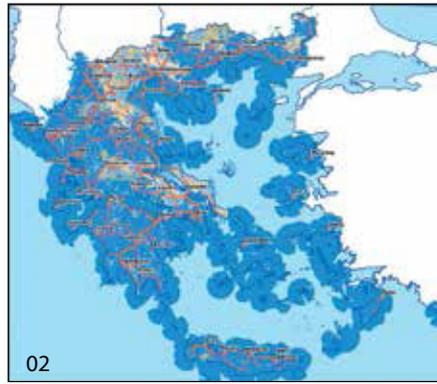
To address the challenges of life, we created the WIND Stores Blood Bank for our employees at the Stores. So far we have been working with the General Hospital of Athens "G. Gennimatas", the General Hospital of Thessaloniki "Ippokratio", the University Hospital in Rio "Panagia i Voithea", the University Hospital of Ioannina and the University Hospital of Larissa, with more hospitals expected to be added soon.

Responsible Network Development

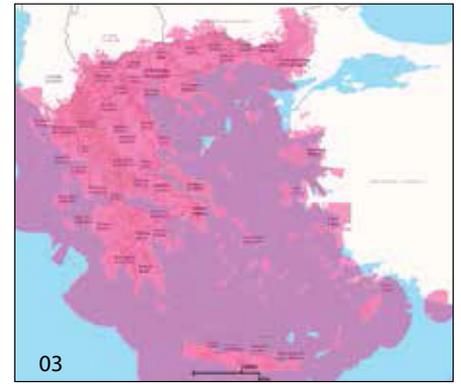
Since our establishment we have invested systematically in infrastructure and the development of our network with responsibility and sensitivity for public health and the environment. The goal of our strategy is to bring mobile broadband closer to Greek users and contribute to the digital transformation of our country.



01 4G Population Coverage



02 3G Population Coverage



03 2G Population Coverage

Area of interest

The mobile telephony network

Status

In 2017, the population coverage of the network reached:

It concerns the development of a completely new radio network that allows nominal mobile broadband speeds up to:

At the present project phase we have completed the modernization of the stations that cover

2017

2G: 99.63% 3G: 85.45% 4G: 87.1%

42 Mbps for 3G 300 Mbps for 4G

Athens, Thessaloniki, the Peloponnese, the Ionian Islands, the Dodecanese Islands, the Cyclades, the North Aegean, the Prefecture of Magnesia, the Prefecture of Pieria, the Prefecture of Serres, the Prefecture of Karditsa, the Prefecture of Xanthi, the Prefecture of Trikala, the Prefecture of Rodopi, Crete, the whole of Chalkidiki, the wider region of the Corinthian Gulf, regions of Boeotia and Evia, regions of Evros, regions of Thesprotia, regions of Larissa and regions of Xanthi.

[p. 124+125](#)

WIND

The fixed telephony network

In 2017, telecommunications hubs were expanded.

The connection circuits have been upgraded through backhauling in sites.

International Capacity

GR-IX

Collocations in Telecommunication Hubs

Underwater Fiber Optic Cables between:

With regard to VDSL coverage, WIND Hellas has reached urban centers by the end of 2017.

In 2017, NGA infrastructure was installed either FTTC: Fiber to the Cabinet, and/or FTTB: Fiber to the Building, and/or FTTH: Fiber to the Home in the regions.

9

186

186 Gbps

20 Gbps

321

Greece - Italy Crete - Peloponnese Peloponnese - Continental Greece

223

Kalamata, Nea Smyrni & Neo Faliro

E/M radiation & measurements

In 2017, E/M measurements were made at WIND stations either by the Victus laboratory or by University Institutions upon our assignment.

13

Promoting Sustainable Development

Internet of Things

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

CLOUD Services

WIND Business Marketplace

A contemporary online environment with all the necessary business applications concentrated in one point, on the Cloud. Managing Cloud Services can be done from anywhere, directly and online through a simple Click on the screen of the Laptop, Tablet or Mobile. Smart search tools make it easier and faster for users to find what they are looking for, so that through the WIND Business Cloud services professionals can significantly increase their business's productivity, efficiently reduce their operating costs and advertise their modern business on the Internet. The WIND Business Cloud services enable online access from any device, from any location, to the corporate emails and contacts, checking in real time the vehicle fleet, as well as direct communication with customers and associates.

WIND Fleet Management

We have developed the innovative WIND Fleet Management service, offering the ability to companies, professionals, public organizations, private companies and institutes that manage vehicle fleets and means of transportation to reduce their operating costs, to better allocate their resources and to increase their safety and productivity by improving their operations and procedures. In this context, they achieve significant reduction in the carbon footprint of their business. **In 2017 we increased our customer base by 36,6%.**

2017

SUSTAINABILITY REPORT

Wind Freeze Alert

We contribute as best as we can to the smooth operation of health interest stores by offering the revolutionary service to manage and monitor refrigerators, the WIND Freeze Alert service. Professionals are able to obtain significant benefits by monitoring the operation of their refrigerators in real time and safeguard the quality of their goods even in cases of power interruption. The WIND Freeze Alert service is a valuable tool in the hands of every professional whose state of merchandise is of vital importance, a fact that makes it necessary in quality control management systems and for obtaining HACCP certification.

With respect for the environment

The devices used and the equipment are recyclable and bear the related mark. Moreover, we are improving the functionality, manageability, appearance, speed and tools of wind.gr to avoid calls and visits for information. Finally, we promote savings in paper for bills, envelopes etc with the use of the e-bill.

Call Number	Mobile Service (individuals)
1270	Balance Update Service for the W and WPlus Plans
1268	Balance Update Service for Prepaid Telephony
1342	Prepaid Bundle Change Service
1215	Account Information Service
1260	Customer Service Department
1231	New Technologies Service Department (Internet, Mobile Broadband, Smartphones)
11818	Greece Telephone Directory Service
Call Number	Mobile Service (individuals)
13800	Fixed Telephony and Internet Customer Service
1212	Technical Support and Fixed Telephony & Internet service from within the network of WIND (free of charge)
211 120 1212	Technical Support and Fixed Telephony & Internet service from another network (with charge)
Call Number	Mobile Service (Businesses)
1277	from WIND mobile phone free of charge
800 500 1277	from fixed line free of charge
6935601277	from another network or overseas with charge

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WIND

Responsible Services

Mobile telephony

- Balance Update Service for the W and WPlus Plans.

For the W and WPlus plans, subscribers are able to receive information on the balance of their airtime, the SMS and MB of their plan or their additional bundle, as well as on the Account Limit they have initially defined, by calling the number 1270 from their mobile phone or through myWIND. In addition, for W and WPlus plans, subscribers always know what is happening on their account because they are updated automatically and free of charge when they are about to or have exhausted the free usage of their plan.

- Protection of minors

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

User updates

- Safety for all

Since all the more transactions are being made online and the need to protect devices, personal data and transactions is increasing all the time, we offer to our Fixed & Internet customers complete protection in their navigation on the Internet from all family devices (computers, smartphones, tablets), free of charge.

- Transparent Invoicing

We ensure that at all customer information points provide cost-related information with transparency, in detail and clearly, through the availability of current price lists, press information or personal communication. With regard to Multimedia Information and Call Charging services, we inform our subscribers in detail of these charges, fully implementing EETT's regulations. The charges for all multimedia information services can be found at the Company website (www.wind.gr).

Responsible Marketing

The programs we provide are in accordance with the regulations and optional rules on communication and marketing, aiming at the customer's complete information on the benefits of our products and services. Thus, we ensure that our communications and promotional material is consistent with the provisions of the Hellenic Code of Advertising - Communications (EKD-E), the provisions on unfair competition and consumer protection and the overall existing Greek legislation. We monitor and strictly adhere to the regulations / guidelines of the Hellenic Communications Control Council (S.E.E.). In 2017, WIND Hellas continued to be the telecommunications company with the fewer communications appeals.

Communication Principles

Our communication strategy is of major importance to all of us at WIND. We focus on the need for exceptional and effective communication that differentiates us from the rest of the market, while also reinforcing our corporate image. In this context, driven by our commitment to the customer and the best possible customer service experience, we have established 3 basic communication principles that govern the way we operate:

-Responsibility

The communication that is simple and understandable to all is of great importance to us and receives special attention. That is why we support distinct communication of products and services through every channel of promotion. More specifically, our websites (wind.gr, F2g.gr, myQ.gr) are key channels of communication with consumers, making the process of obtaining information on our products and services easy, simple and fast. In a further effort for the public to obtain information that is clear, correct and easy to understand, we place particular emphasis on surveys of qualitative and quantitative nature. Surveys are an integral part of the procedures we follow, aiming to improve our communication to the general public.

2017

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-Directness

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

-Honesty

At WIND, we make substantial efforts so that our communication is consistent with the principles of fair competition, complying with the Code of Commercial and Social Communication. Our goal is to build relationships of trust with existing and potential customers. This is why we invest in advertisements that gain public acceptance, explicitly communicate all product information and are not contrary to the Hellenic Advertising Code. It is worth noting that, in 2017, WIND had by far the fewest control requests by the Communication Control Council, compared to its direct competitors in the category of Telecommunications.

Code of Conduct

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

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

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

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

Intellectual property rights & communication privacy

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

Furthermore, we fully comply with our legal obligations as networks and electronic communication services providers in relation to intellectual property protection. Moreover, we have signed a Cooperation Framework with the local Collective Copyright Management Organizations (AEPI and self management for music) aiming to act together in order to inform and raise awareness of the general public regarding Internet piracy and the subsequent damage that the owners of copyrights suffer, which are internationally recognized as human rights. Regarding the security of Electronic Communication Privacy, we have a full set of security rules in the form of policies and procedures. The management of personal data of our customers is in full compliance with the legislation on the protection of individuals from the processing of personal data.

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WIND

Customer Satisfaction

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

Surveys - Our relationship with consumers

Our research program consists of tracker surveys that are conducted in waves as well as ad hoc surveys that research specific issues as they arise.

Both research approaches have one common goal:
understanding the telecommunication needs of the consumer so that we can offer the best services.

- Tracker Surveys

In particular, independent research agencies of ESOMAR completed 12 wave surveys that aimed to monitor specific "health" indices for our Company.

- Ad Hoc Surveys

Ad hoc surveys provided us with valuable insights on current issues the organization faces. In 2017, more than 10 projects took place (both qualitatively and quantitatively).

- Customer Satisfaction Survey

The customer satisfaction survey is incorporated in the largest research program of the Company, which is in the form of tracker survey and is conducted in 12 waves each year. More specifically, we recorded and monitored the evaluation of the customer experience and the competition's in key issues.

The areas investigated include a) the total experience with the provider, b) the experience with the coverage/network, c) the experience with plans and packages, d) the experience with the store, and e) the experience with the Call Center. The objectives of this research program is to monitor the above key indices and to compare them to the competition's performance. The findings of this survey enable us to design interventions / corrective actions so that our customers are always satisfied with our products and our services.

- Customer Satisfaction Survey CSAT

In the scope of reinforcing our customer-focused philosophy, we try to improve daily the procedure for recording the subscriber's service experience after completing the telephone communication with the Customer Service Department. Through this procedure we aim to ensure and improve the quality of offered services. The key parameters of this recorded survey is to measure customer satisfaction, to take preventative and corrective measures to improve customer service and reinforce the subscriber's trust and dedication to the Company.

Through the results we obtain, which are communicated to Management and the involved departments, we analyze all internal procedures and our products and service with respect to any impacts they may have to our customer base. It is our daily objective to collectively act to take improvement/corrective measures, having recognized the need to provide advanced products and services that meet the needs and requirements of the modern consumer.

2017

SUSTAINABILITY REPORT

The customer satisfaction survey (CSAT) continued in 2017 and revealed the high level of interest and the Company's commitment toward its customers.

The percentage of subscribers who responded to the question "How would you describe your overall experience from your Call Service?" that the telephone service they received from the Mobile & Fixed Telephony Customer Service Departments was "Excellent" and "Satisfactory" (CSAT), for 2017 was 79.58%. In addition, we evaluate the NPS (Net Promoter Score) index incorporated in 2015 to the CSAT customer satisfaction questionnaire. The NPS index is a way to evaluate the relationship developed between a company and its customers. This index deduces the percentage of customers who would recommend the product or the services they use to others.

Natural Language Understanding (NLU) for the Customer Service numbers

The NLU - Natural Language Understanding technology is a new technology that replaces the traditional and static IVRs (Interactive Voice Response). NLU provides the capability of combining the telephone number for which the subscriber needs service with his request and to forward the call to the unit responsible for the service. The number for which service is requested can be the same or a different one than the calling number. The pilot application of technology (NLU) started in 2016 and now serves customers calling 13800, 1212 and 1260 for commercial and technical issues of Mobile and Fixed Telephony.

The technology in question has benefits for both the customer and the Company, achieving call routing to the responsible service team depending on the customer's request. More specifically, it ensures:

- increased customer satisfaction
- resolution / management from the first contact
- reduction of the total management time required per customer.



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WIND

“Knowledge Base” information management platform

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

Posting the updates every day to the integrated information management platform “Knowledge Base” is an internal knowledge tool and provides valid information since it is updated on a daily basis. The Customer Service Department representatives undertake the role of “consultant”, providing high level of service, before as well as after the sale. Following is a diagram illustrating the number of updates posted to the Customer Service Department for 2017.

By the end of 2017, the total number of users who have access to the Knowledge Base platform is 1,140 consisting of internal users (WIND employees) as well as external partners.

Systems upgrade for better service

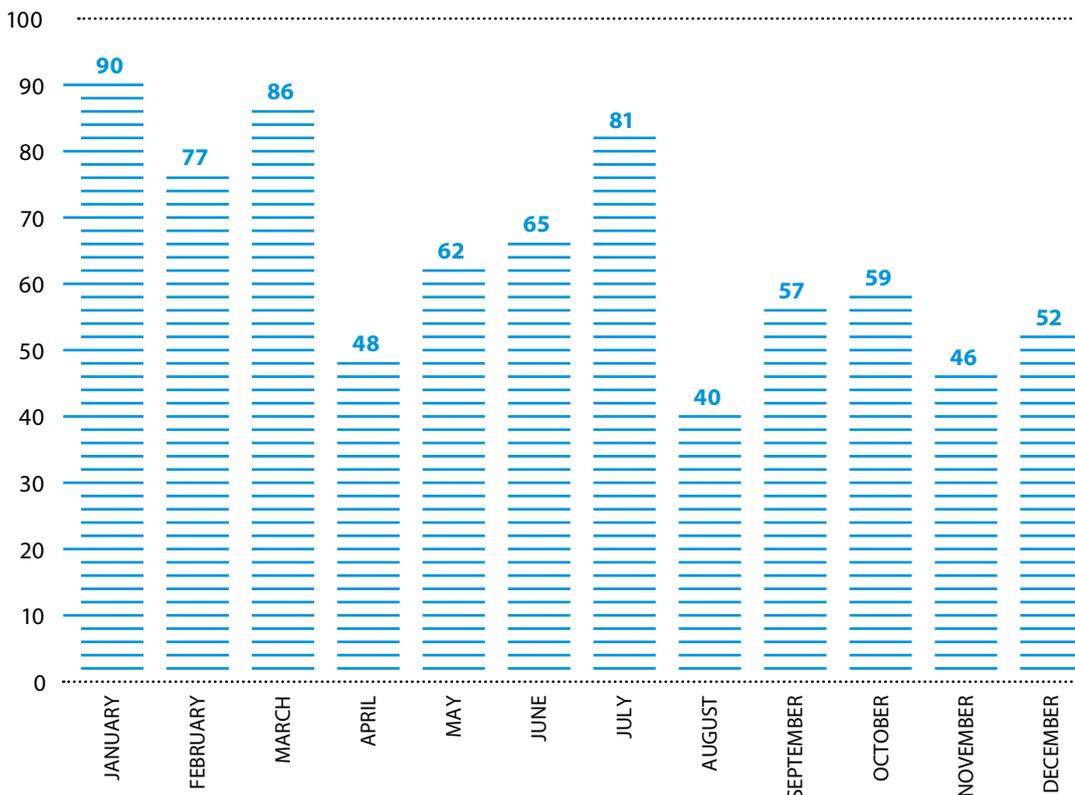
In 2016 we upgraded the application (Siebel) which is the main system that manages all subscribers (individuals and business subscribers) by the Customer Service Department.

The objective of this upgrade was to improve the internal procedures on the management of the entire customer base more effectively, so as to ensure the immediate handling and resolution of the subscribers’ requests.

It should be noted that with the completion of the upgrade in 2017, the access to the data of mobile and fixed telephony subscribers is immediate, meeting the constantly increasing needs of the market.

ANNOUNCEMENT

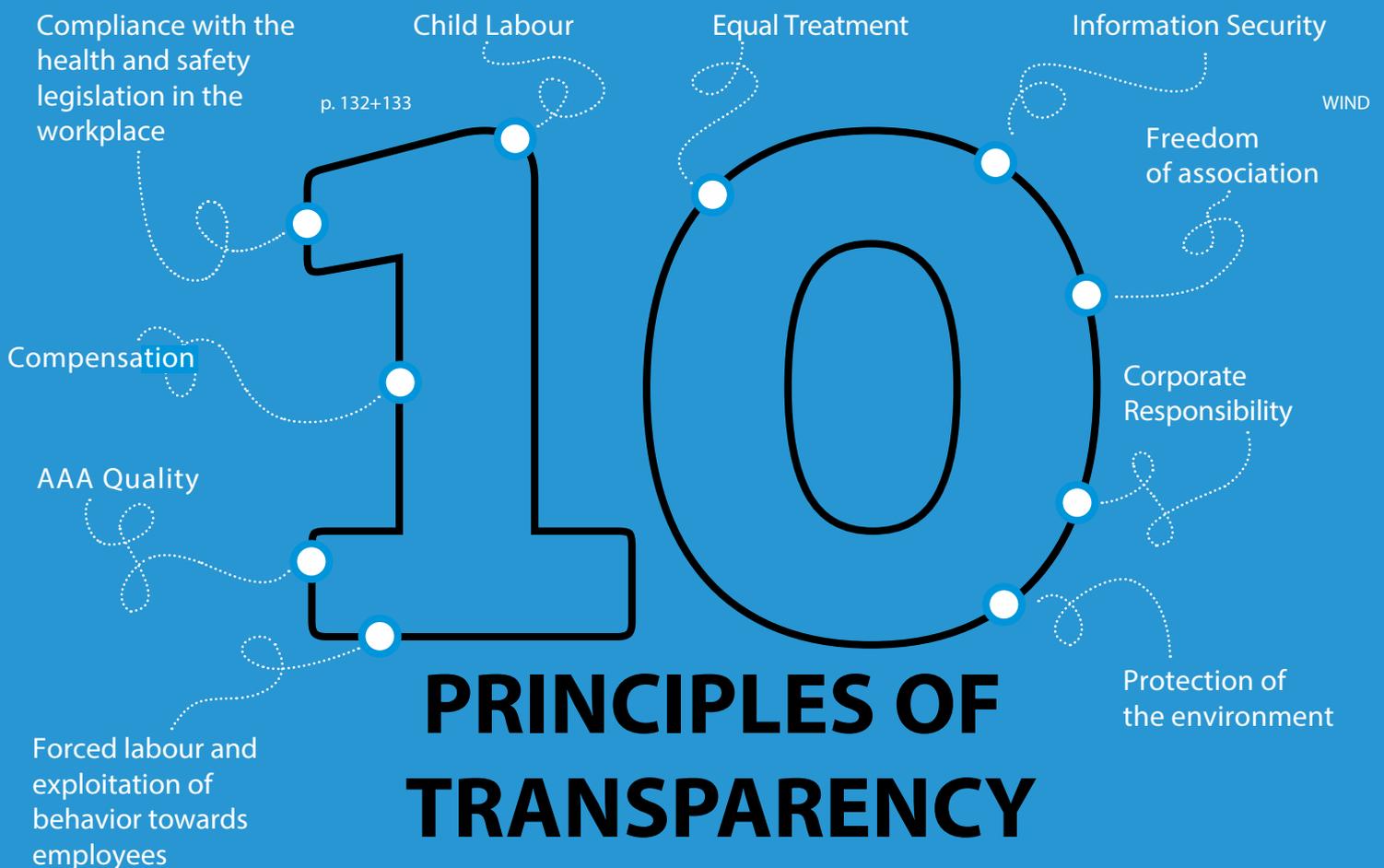
FIGURE 8.1



Responsible Procurements

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

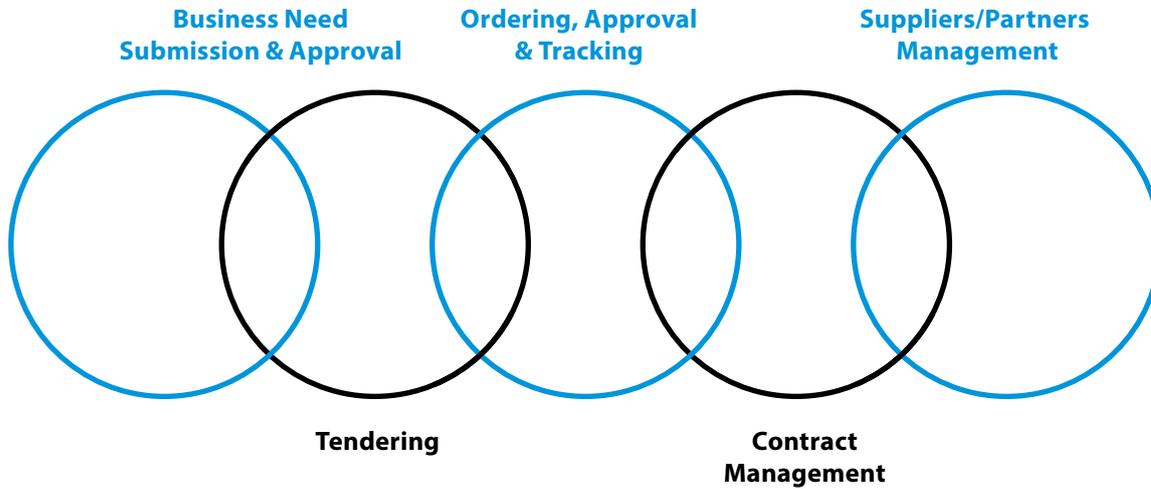
Using specific forms, general conditions of cooperation and / or other procedures, we expect any supplier who is interested in joining the list of suppliers that work with our Company to comply with the obligations relevant to its business activities arising from the national and European legislation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



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

Supplier rating

We try to constantly improve the effectiveness and efficiency of our supply chain by developing the quality characteristics of our supply base, evaluating our most critical and major suppliers and taking all the necessary measures where required. At the same time we adopt new tools and methods to accelerate the operation, to improve the monitoring and evaluation of the critical performance indices and to maximize the transparency of all procedures.



In 2017 and in the context of promoting Corporate Responsibility in our supply chain, we sent the “Code of Conduct of WIND Hellas” to all new suppliers, having set as a necessary condition of cooperation the acceptance of the Code. In any case, the acceptance of the General Procurement Conditions, the Confidentiality Agreement and the Code of Conduct, as well as completing questionnaires related to the business activity, are just some of the main requirements for a new supplier to be included in our supply chain base.

2017

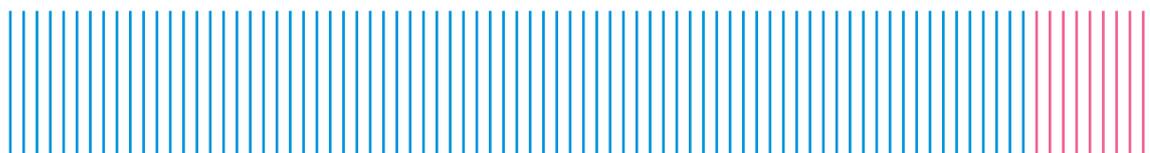
SUSTAINABILITY REPORT

We evaluate our suppliers in accordance with the requirements of the management systems under ISO 9001 and ISO 14001, monitor tenders and perform inspections when appropriate. In 2017, the relevant department continued to make regular visits to the premises of critical suppliers in order to verify they are in complete compliance with the requirements of the respective projects and that they meet the above-mentioned specifications. Based on our specific procedures we evaluated 48 of our largest suppliers.

Out of them, 43 suppliers were found to fully meet the corporate performance criteria, while in 5 cases further monitoring was found to be required, and thus we proceeded to all the necessary actions, taking all necessary measures. At the same time, by adopting specific procedures, we evaluated 6 critical suppliers of Victus, of which 5 were found to fully meet the corporate performance criteria, while 1 was deemed non-compliant and the appropriate measures have been adopted.

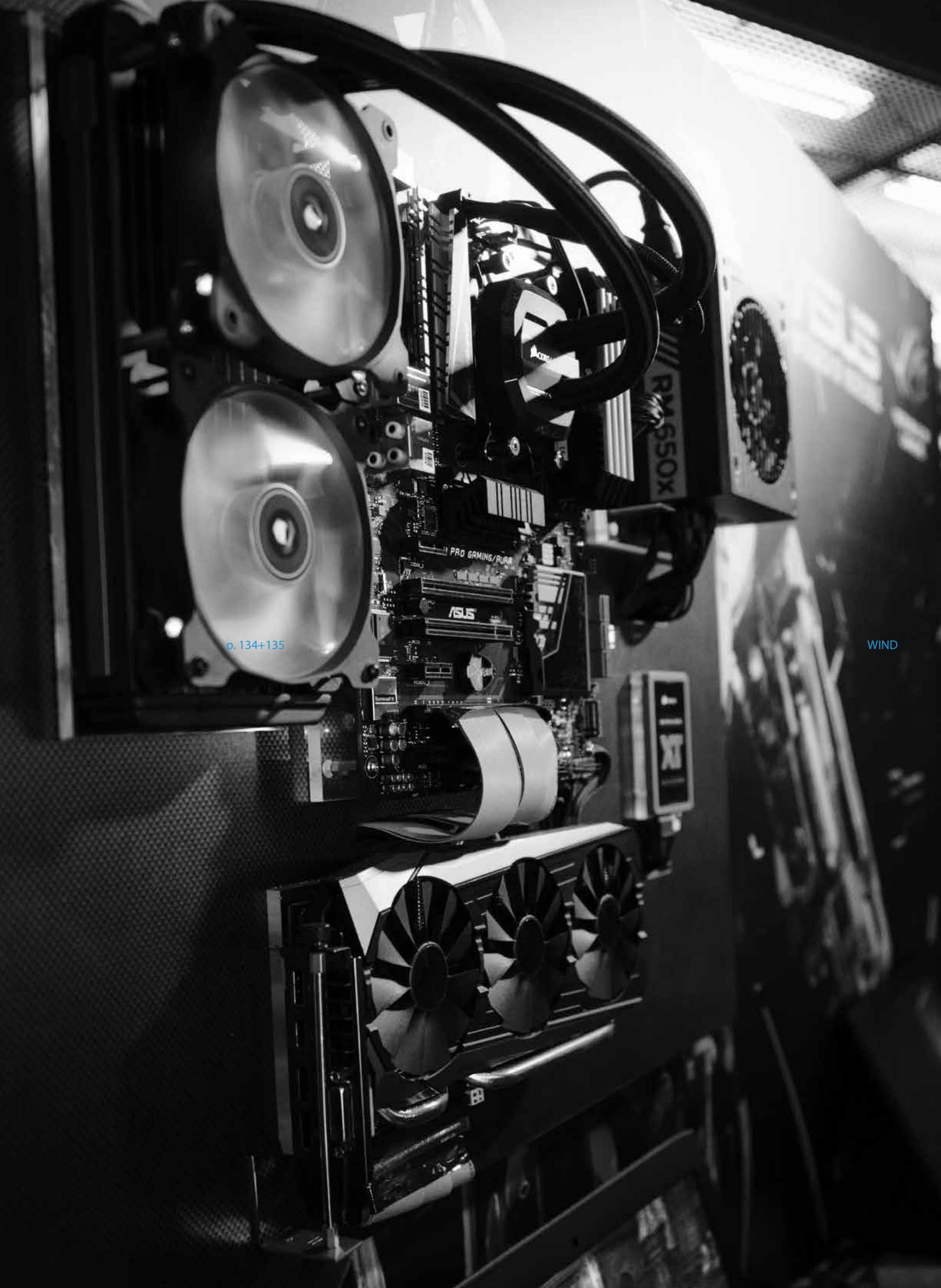
Supporting the local community

We try to support the local markets mainly with respect to contractor / building projects, where we use companies of each region where possible, while with respect to purchasing promotional materials and printing work we always use Greek companies. The percentage of spending on local suppliers (Greek companies) was about 94% of WIND's total expenditures for 2017. The majority of spending on non-local suppliers concerns purchases of telecommunications products for which there is no representation of the Company in Greece.



— 94%
of total costs are
for local suppliers

— 6%
to non-local suppliers
for products that do
not have local
representation



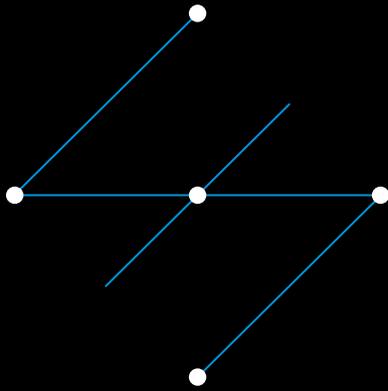
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WIND

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OUR PERFORMANCE →

2017

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We present our progress for 2017 and our commitments and objectives for the current year.

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WIND

Objectives & Results 2017

SUSTAINABILITY

- Completing the revision of the Code of Conduct. ✓
- The implementation of new policies: "Anti-Corruption Policy", "Non-Retribution Policy" and "Business Continuity Management Policy" and "Occupational Health and Safety Policy". ✓
- Continuous redesign and improvement of our procedures and simplification aiming at Operational Excellence. ✓
- Redesigning the crisis management procedure and communications planning. ✓
- The certification of our Company in accordance with the international standard ISO 22301:2012 (Social Security Business Continuity Management System). ✓
- The constant improvement and development of the Business Continuity Management System in the scope of the constantly evolving environment of telecommunications and the regulatory requirements. ✓
- The re-certification of our Company in accordance with the updated International Standard ISO 9001:2015. ✓
- The certification of our Company in accordance with the International Standard BS OHSAS 18001:2007 on occupational health and safety. ✓
- The certification of our Company in accordance with the International Standard ISO 14001:2015 for the Environment. ✓

2017

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Society

- Expanding our actions to improve the quality of life and dealing with the uncontrolled increase of stray animals. ✓
- Seeking new ways to support TEDx events across Greece. ✓
- Strengthening the investment in social networking media aiming to further infiltrate our actions for: a) safe use of new technologies by children and b) the running movement to a larger portion of the population. ✓
- Continuing to support running champions and mountain running of medium and larger distances. ✓

Our People

- The development of the HRMS platform aiming at the empowerment of the user. ✓
- Creating job opportunities in Greece and strengthening the talent retention mechanisms with respective initiatives, such as the Young Talents programs. ✓
- Strengthening the internal culture with initiatives that support cooperation between departments. ✓
- Providing complete care and "well-being" for our employees and their families through more actions in the scope of "euWIND". ✓
- Further support and promoting the corporate reputation of our Company as one of the most significant employers of choice in the Greek market. ✓
- Awareness program of employees on musculoskeletal problems due to sitting for many hours at work for office employees. ✓
- Communication of risk management assessment results to all employees annually or more frequently. ✓

Market

- Reinforcing the customer-focused culture of our employees and implementing more actions to continually improve the experience of our customers in all points of contact. ✓
- The constant growth of our subscriber base. ✓
- The best services provider with the use of NGA networks in Greece. ✓
- The best provider of bundle services for Fixed Telephony and Internet in Greece, and a point of reference for providers in Europe. ✓
- Offering high quality television services to customers of WIND Hellas. ✓
- The proper operation of our procedures, with the focus on implementing and completing projects that drastically upgrade the customer experience and the level of our services. ✓
- The expansion of the use of the new e-procurement tool and developing the effectiveness and efficiency of the Procurement Department. ✓
- The support and development of the quality characteristics of our supplier base and certifying all our suppliers, by signing general terms of procurement, completing related questionnaires and the acceptance of the Company's formal code of conduct. ✓
- Continuing the evaluation of our critical and major suppliers, through on-site visits. ✓

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WIND

Environment

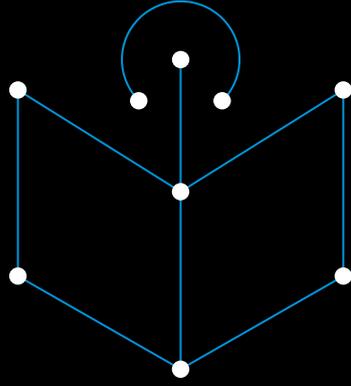
- Continuing the renovation projects at facilities so as to concentrate equipment in a smaller area; with simultaneous projects to improve the energy efficiency of the telecommunications centers and evacuating facilities that are no longer being used. ✓
- The replacement of the corporate vehicle fleet. ✓
- Increase of registered subscribers to the electronic services. ✓

2017

SUSTAINABILITY REPORT

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WIND



ABOUT THE SUSTAINABILITY REPORT →

2017

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SUSTAINABILITY REPORT



This 2017 Sustainability Report includes information on the Corporate Responsibility policies and programs of WIND Hellas, as well as our performance on actions that we developed aiming at sustainable development and entrepreneurship, placing our priority on four axes: the Market, our People, the Environment and Society. This report covers our Company's activity for the year starting 1 January and ending 31 December 2017. This is the eleventh consecutive annual Sustainability Report we issue: the previous one was issued in July 2017 concerning 2016.

Our Corporate Responsibility Committee, which comprises representatives of the Company's main departments, worked to compile this Report as well as to collect all information contained therein. In some cases there were corrections to data of previous years due to the different method of data calculation. In order to determine and develop the content of this Report, we took account of the Materiality analysis, the Principles and Goals of Sustainable Development, as set out in the UN Global Compact Standard and the 2030 Agenda, as well as the core guidelines of the GRI STANDARDS edition of the Global Reporting Initiative Guidelines.





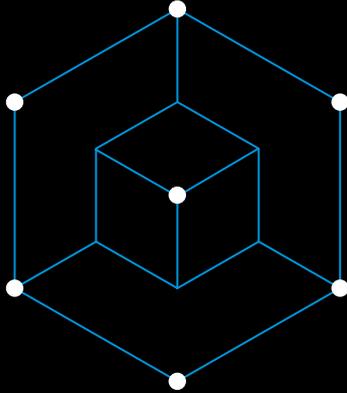
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UN GLOBAL COMPACT →
Progress Report



WE SUPPORT

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SUSTAINABILITY REPORT



WIND Hellas supports the 10 principles of the United Nations Global Compact regarding human rights, labour practices, environmental protection and combating fraud. With intent to actively support and develop these principles in our sphere of influence, since 2008 we are committed to implement the Global Compact and its principles in our strategy, culture and everyday functioning, and also to clearly communicate this commitment to our employees, partners and customers and the general public. Focusing on monitoring and transparency, we report our progress in the various axes to all our stakeholders.



Progress Report

Principle	Reference in Report	Progress Report
	Human Rights	
Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights.	Human Rights & Equal Opportunities / Employee Health & Safety / Responsible Services
Principle 2	Businesses should make sure that they are not complicit in human rights abuses.	Human Rights & Equal Opportunities
	Working Conditions	
Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	Freedom of Association.
Principle 4	Businesses should uphold the elimination of all forms of forced labour.	Human Rights & Equal Opportunities
Principle 5	Businesses should uphold the effective abolition of child labour.	Human Rights & Equal Opportunities
Principle 6	Businesses should uphold the elimination of discrimination in respect of employment and occupation.	Human Rights & Equal Opportunities
	Environment	
Principle 7	Businesses should support a precautionary approach to environmental challenges.	Environmental Management.
Principle 8	Businesses should undertake initiatives to promote greater environmental responsibility.	Reduction in paper use.
Principle 9	Businesses should encourage the development and diffusion of environmentally friendly technologies.	Climate, energy & energy management / Reduction in paper use / Promoting Sustainable Development.
	Anti-Corruption	
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.	Internal Audit & Risk Assessment.



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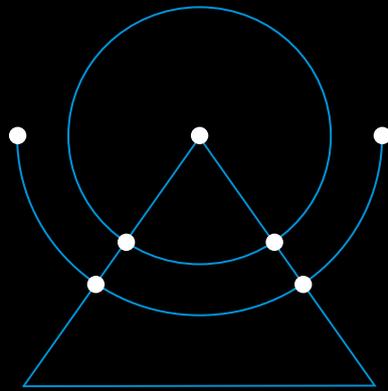
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WIND

Materiality Key Issues	Limits within the Organization	Limits Outside the Organization	Restrictions inside and outside the Organization
Protection of personal data	WIND / Employees / Commercial network	Regulatory Authorities / Customers	This Report and the data describing our performance on the materiality key issues cover all activities of WIND Hellas
E/M Radiation	WIND / Employees / Commercial network	Local Government / Customers / Regulatory Authorities	
Privacy of communications	WIND / Employees / Commercial network	Regulatory Authorities / Customers	
Network investments	WIND / Shareholders / Commercial Network	Customers / Government / Partners	
Wages & benefits	WIND / Employees / Shareholders		
Governance and management	WIND / Employees / Shareholders / Commercial network	Regulatory Authorities	
Safe use of new technologies	WIND / Commercial Network	Customers / NGO / Regulatory Authorities	
Quality of Services	WIND / Employees / Shareholders / Commercial Network	Customers / Suppliers / Partners / Regulatory Authorities	
2017			
Employee Health & Safety Promoting sustainable development through IT and communications products and services	WIND / Employees / Shareholders / Commercial Network	Government / Partners / Suppliers / Customers / Partners / Suppliers / Local Government	

Correlation table of UN Sustainable Development Goals, WIND Materiality Key Issues, Strategy 2020, and GRI Standards



Sustainable Development Goals

Materiality Key Issues

Commitments 2020

GRI STANDARDS



1.4 By 2030, ensuring that all men and women, especially the poor and vulnerable, have equal rights of access to financial resources, as well as access to basic services, land ownership and control, as well as other forms of ownership, the heritage, natural resources, appropriate new technologies, financial services, including microfinance.
1.5 By 2030, building the resilience of the poor and those in a vulnerable situation, reducing their exposure and vulnerability to extreme weather-related phenomena and other economic, social and environmental pressures and disasters.

Promoting sustainable development through IT and communications products and services.

Innovation index.
 Strengthening the domestic supply market to boost the economy.

GRI 203
 GRI 204



2.1 By 2030, ending hunger and ensuring that all people, especially the poor and people in vulnerable situations, including children, have access to safe, nutritious and sufficient food throughout the year.

Promoting sustainable development through IT and communications products and services.

GRI 203
 GRI 204

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3.9 By 2030, ensuring a substantial reduction in the number of deaths and illnesses caused by hazardous chemicals, as well as pollution and air, water and soil pollution.
3.10 Strengthening the capacity of all countries, especially developing countries, to alert, reduce and manage national and global health risks.

Employee Health and Safety Electromagnetic Radiation.

Creating programs and activities that develop the physical and mental health of employees and their family "euWIND".
 Extending flexible working hours.

GRI 403
 GRI 416



4.4 By 2030, substantially increasing the number of young people and adults who have the appropriate skills, including technical and professional skills, for employment, decent work and entrepreneurship.

Employee growth and development

Strengthening education and development programs for all employees. Providing all employees with an educational program for sustainable development.

GRI 404



5.1 Ending any form of discrimination against women and girls anywhere.

Human rights & equal opportunities.

More women in managerial positions.

GRI 405



6.1 By 2030, achieving universal and equal access to safe and affordable drinking water for all.
6.6 By 2020, protection and rehabilitation of aquatic ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes.

Employee Health & Safety.
 Waste Production & Management.

GRI 403
 GRI 306

	<p>7.3 By 2030, doubling the global rate of improvement in energy efficiency.</p>	<p>Climate, Energy and Energy Management.</p>	<p>Universal participation in annual employee survey.</p>	<p>GRI 302</p>
	<p>8.5 By 2030, achieving full and productive employment and decent jobs for all women and men, including young people and people with disabilities, and ensuring equal pay for work of equal value.</p>	<p>Employee distribution.</p>	<p>Universal participation in annual employee survey.</p>	<p>GRI 405 GRI 102-8 GRI 102-41</p>
	<p>9.4 By 2030, upgrading infrastructure and transforming industries to make them sustainable by increasing resource efficiency and encouraging the adoption of cleaner and environmentally sound technologies and industrial methods with all countries taking action in this direction, based on their potential.</p> <p>9.b Supporting indigenous technology development, research and innovation in developing countries, ensuring a favorable policy environment that supports, inter alia, industrial diversification and added value of goods.</p> <p>9.c Significant increase in access to information and communications technology and the pursuit of universal and affordable access to the Internet in the least developed countries by 2020.</p>	<p>Investing in development. Responsible Network Development. Promoting Sustainable Development.</p>	<p>Safe use of new technologies by children through Kids@safety. "WE COME CLOSER" Program.</p>	<p>GRI 416 GRI 203</p>

	<p>10.2 By 2030, strengthening and promoting social, economic and political integration of all, irrespective of age, gender, disability, race, nationality, origin, religion or economic or other status.</p>	<p>Human rights & equal opportunities.</p>	<p>Strengthening "WE COME CLOSER" programs in order to have equal access to communication to all Greeks. We invest in the digital transformation of the place.</p>	<p>GRI 405</p>
	<p>11.1 By 2030, ensuring everyone has access to adequate, secure, affordable housing and basic services, and upgrading the slums.</p> <p>11.6 By 2030, reducing the per capita environmental impact of cities, paying particular attention to air quality and the management of urban and other waste.</p>	<p>Social Product. Responsible Network Development. Promoting Sustainable Development. Environmental Management.</p>		<p>GRI 413 GRI 307</p>
	<p>12.4 By 2020, achieving environmentally sound management of all chemicals and all their wastes, in line with internationally agreed frameworks, and significantly reducing their emissions to air, water and soil in order to minimize the adverse effects on human health and the environment.</p> <p>12.5 By 2030, substantial reduction in waste generation through prevention, reduction, recycling and re-use.</p> <p>12.6 Encouraging companies, especially large and supranational, to adopt sustainable practices and integrate sustainability information into their reports.</p>	<p>Waste Production & Management. Reduction in paper use. Sustainability Report.</p>	<p>Saving paper from our digital services.</p>	<p>GRI 306 GRI 306 GRI Table</p>

	<p>13.2 Integration of climate change measures into national policies, strategies and plans.</p>	<p>Climate, Energy and Energy Management.</p>	<p>Performing energy audits in all our facilities to increase energy efficiency. Reduce greenhouse emissions from the operation of our offices. Creating a Climate Neutral Certified Shop.</p>	<p>GRI 305</p>
	<p>14.1 By 2025, prevention and significant reduction of all forms of marine pollution, in particular pollution from land-based activities, including marine litter and nutrient pollution.</p>	<p>Waste Production & Management.</p>		<p>GRI 306</p>
	<p>15.1 By 2020, ensuring the conservation, restoration and sustainable use of inland ecosystems and inland ecosystems and their services, in particular forests, wetlands, mountains and drylands, in accordance with the obligations arising from international agreements.</p>	<p>Waste Production & Management. Electromagnetic Radiation.</p>	<p>Reduction of waste resulting in landfills.</p>	<p>GRI 306 GRI 416</p>
	<p>16.3 Promoting the rule of law at national and international level and ensuring equal access to justice for all. 16.5 Substantial reduction in all forms of corruption and bribery.</p>	<p>Social Product. Responsible Network Development. Promoting Sustainable Development. Corporate Responsibility Strategy 2020. Code of Conduct. UN Global Compact.</p>		<p>GRI 413 GRI 102-16</p>
<p>p. 164+165</p>				<p>WIND</p>
	<p>17.16 Strengthening the Global Partnership for Sustainable Development, complemented by multilateral partnerships that mobilize and share knowledge, expertise, technology and financial resources to support the achievement of Sustainable Development Goals in all countries, especially in developing countries.</p>	<p>Sustainability Report. Dialogue with Stakeholders. Participation in Professional Organizations and Organizations for Sustainable Development. Co-operation with the Cyber Crime Unit of the Hellenic Police.</p>	<p>Continuous information program in shops on the 2020 commitments and annual progress.</p>	<p>GRI 203-2</p>

GRI Standards	Description	Reference	External Assurance	General information
GENERAL DISCLOSURES				
Company Profile				
GRI 102-1	Name of the Organization	Wind Hellas Telecommunications S.A.	✓	
GRI 102-2	Main brand names, products and services	p. 22	✓	
GRI 102-3	Location of the Organization	66 Kifissias Ave., 151 25, Maroussi	✓	
GRI 102-4	Countries in which the Organization operates	p. 23	✓	
GRI 102-5	Status of ownership and legal form	Commercial & Industrial S.A.	✓	
GRI 102-6	Markets served	p. 22-23	✓	
GRI 102-7	Figures of the Organization issuing the Report	p. 20, 23	✓	
GRI 102-8	Labor force data by age group, gender, age group, mobility and other differentiation indicators	p. 80, 83-85	✓	
GRI 102-9	Description of the Company's supply chain	p. 133-134	✓	
GRI 102-10	Significant Changes in the Organization and the Supply Chain	There were no significant changes	✓	

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GRI 102-11	Explanations on the implementation of the precautionary principle	p. 54-55	✓
GRI 102-12	External Voluntary Initiatives for Sustainable Development in which the Company participates	p. 72-74	✓
GRI 102-13	Participation in unions / organizations	p. 24	✓
Strategy			
GRI 102-14	Administration Message	p. 12	✓
GRI 102-15	Description of the main impacts, risks and opportunities	p. 54	✓
	Ethics and integrity		✓
GRI 102-16	Mission Statement and Values and Corporate Policies on the Sustainable Development Strategy	p. 34-39, 50-59	✓
Governance			
GRI 102-18	SUSTAINABILITY Structure	p. 39, 50-53	✓
	Dialogue with Stakeholders		✓
GRI 102-40	SUSTAINABILITY Structure	p. 40-41	✓
GRI 102-41	Percentage of employees covered by collective labor agreements	p. 84	✓
GRI 102-42	Identifying and Selecting Stakeholder	p. 40	✓
GRI 102-43	Addressing Stakeholder involvement	p. 40-41	✓

GRI 102-44	Key issues and concerns raised by the Stakeholders	p. 40-41	✓
	Exhibition Practices		
GRI 102-45	List of entities included in the Company's financial reports	p. 23	✓
GRI 102-46	Specifying the content of the Report	p. 42	✓
GRI 102-47	Materiality Key Issues	p. 42-43	✓
GRI 102-48	Explanations of the impact of information review	No revised information	✓
GRI 102-49	Significant changes compared to previous reports	There were no significant changes	✓
GRI 102-50	Report Period	01.01.2017 - 31.12.2017	✓
GRI 102-51	Previous Report	July 2017	✓
GRI 102-52	Report Cycle	Annual	✓
GRI 102-53	Contact point for questioning	Back page	✓
GRI 102-54	Statement to select the in-accordance level of the Report	p. 147	✓
GRI 102-55	GRI Table	p. 166-169	✓
GRI 102-56	External Assurance	p. 172-179	✓

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	GRI Standards	Description	Reference	External Assurance
Specific Disclosures	SPECIFIC DISCLOSURES			
		Economy		
	GRI 201	Economic Performance		✓
	GRI 103	Administrative Approach	p. 20-23	✓
	GRI 201-1	Direct Value Generated and Distributed	p. 23	✓
	GRI 203	Indirect Economic Impacts		
	GRI 103	Administrative Approach	p. 43, 124-125	✓
	GRI 203-1	Development and Impact of Investment in Infrastructure and Supported Services	p. 43, 124-125	✓
	GRI 204	Procurement Practices		
	GRI 103	Administrative Approach	p. 133-134	✓
	GRI 204-1	Percentage of costs to local suppliers	p. 134	✓
	GRI 205	Anti-Corruption		
	GRI 103	Administrative Approach	p. 56-57	✓
	GRI 205-1	Total number and percentage of activities assessed against the risks related to corruption and significant risks identified	p. 56-57	✓

GRI 205-2	Communication and training on anti-corruption policies and procedures	p. 57	✓
GRI 206	Anti-competitive Behavior		
GRI 103	Administrative Approach	p. 128	✓
GRI 206-1	Total number of legal actions for anticompetitive behavior, antitrust and monopoly practices and their effects	p. 128	✓

GRI Standards	Description	Reference	External Assurance	Environment
	Environment			
GRI 302	Power			
GRI 103	Administrative Approach	p. 106	✓	
GRI 302-1	Energy consumption within the organization	p. 106-109	✓	
GRI 302-3	Energy intensity	p. 106	✓	
GRI 302-4	Reduce energy consumption	p. 106-109	✓	

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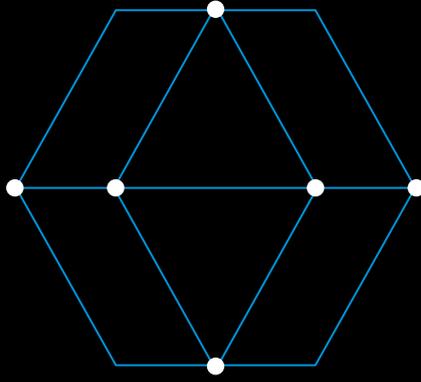
GRI 305	Emissions		
GRI 103	Administrative Approach	p. 110	✓
GRI 305-1	Direct greenhouse gas emissions (category 1)	p. 110	✓
GRI 305-2	Energy indirect greenhouse gas emissions (category 2)	P. 111	✓
GRI 305-3	Other indirect greenhouse gas emissions (category 3)	p. 111	✓
GRI 305-5	Reduction of greenhouse gas emissions	p. 110-111	✓
GRI 305-6	Reduction of greenhouse gas emissions	p. 111	✓
GRI 306	Effluents and Waste		
GRI 103	Administrative Approach	p. 112-114	✓
GRI 306-2	Total waste weight by type and method of disposal	p. 113	✓
GRI 306-4	Weight of moving, imported, exported or treated wastes considered hazardous	p. 115	✓
GRI 307	Environmental Compliance		
GRI 103	Administrative Approach	p. 104-105	✓
GRI 307-1	Non-compliance with environmental legislation and regulations	p. 105	✓

GRI Standards	Description	Reference	External Assurance
Employees - Society			
GRI 401	Employment		✓
GRI 103	Administrative Approach	p. 82	✓
GRI 401-1	Total number and rates of recruitment of young employees, and rate of retirement	p. 84	✓
GRI 401-2	Benefits offered to full-time employees	p. 86	✓
GRI 403	Occupational Health and Safety		
GRI 103	Administrative Approach	p. 87-88	✓
GRI 403-2	Type and rates of injury, sick days lost, absences and deaths	p. 87	✓
GRI 404	Training and Education		
GRI 103	Administrative Approach	p. 88-92	✓
GRI 404-1	Average training hours per year and per employee	p. 90	✓
GRI 405	Diversity and Equal Opportunities		
GRI 103	Administrative Approach	p. 85	✓
GRI 405-1	Composition of governance bodies and employee analysis	p. 83-85	✓
GRI 413	Local Communities		
GRI 103	Administrative Approach	p. 67	✓
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GRI 405-1	Composition of governance bodies and employee analysis	p. 83-85	✓
GRI 413	Local Communities		
GRI 103	Administrative Approach	p. 67	✓
GRI 413-1	Percentage of activities where local communities are consulted, impact assessments and development programs	p. 67-75	✓
GRI 414	Evaluation of suppliers on human rights issues		
GRI 103	Administrative Approach	p. 133	✓
GRI 414-2	Significant existing and potential negative impact on the supply chain on human rights and actions taken	p. 133-134	✓
GRI 416	Customer Health & Safety		
GRI 103	Administrative Approach	p. 112	✓
GRI 416-1	Percentage of the major categories of products and services for which health and safety effects are assessed with a view to improving	p. 112	✓
GRI 418	Customer Privacy		
GRI 103	Administrative Approach	p. 129	✓
GRI 418-1	Total number of substantiated reports relating to customer privacy breaches and customer data losses	p. 129	✓



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EXTERNAL ASSURANCE REPORT →
Sustainability Report 2017 WIND Hellas

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SUSTAINABILITY REPORT



The External Assurance Report conducted by the Center for Sustainability and Excellence (CSE) to WIND Hellas covers the Sustainability Report 2017 ("Report") for the period from 1 January 2017 to 31 December 2017. The purpose of the process is to re-assert the WIND Hellas Stakeholders for the accuracy, reliability and objectivity of the information in the Report and that it covers all materiality key issues for WIND Hellas and its key Stakeholders. The Sustainability Report of WIND Hellas has been prepared based on the "in-accordance" guidelines of the Global Reporting Initiative STANDARDS.







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External Assurance Report – WIND Hellas 2017 Sustainability Report

The external assurance report was conducted by the Centre for Sustainability and Excellence (CSE) for WIND Hellas and refers to the Sustainability Report (“Report”) for the period January 1st, 2017 to December 31st, 2018. The aim of the assurance process is to provide confirmation to the stakeholders of WIND Hellas for the accuracy, the reliability and the objectivity of the information in the sustainability report, and that the sustainability report contains all the material issues for WIND Hellas and for its key stakeholder groups. The 2017 Sustainability Report of WIND Hellas has been conducted according to the GRI STANDARDS reporting guidelines (“in-accordance core”) of the Global Reporting Initiative (GRI).

Scope of Work

The scope of work contained the review of the activities described in the 2017 Sustainability Report, as well as the information and data about the sustainability performance of WIND Hellas during the reporting period. Specifically, it included:

1. Statements, information and performance data contained in the Report.
2. The process WIND Hellas followed for the determination of the material issues contained in the Report, and the management’s approach towards these material issues.
3. Data and information contained in the Report according to the guidelines of the GRI STANDARDS reporting guidelines of the Global Reporting Initiative, as presented in the GRI Index Table.

The external assurance process was conducted according to the specifications of the internationally recognized assurance standard AA1000AS (2008). The scope of work was defined and agreed upon with WIND Hellas to be a “Type 2 moderate” assurance.

General Conclusions

With respect to the scope of work, it was observed that:

- The description of the activities and performance of WIND Hellas during 2017, as well as the manner in which they have been described in the Report, is accurate.
- WIND Hellas complies with the principles of inclusivity, materiality and responsiveness of the AA1000 Assurance Standard.

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In case of any disagreement in the translation from Greek to English, the Greek version of the Report will prevail with respect to our conclusions.

Main Observations and Proposals

WIND Hellas performed significant improvements in managing and presenting its sustainability performance during the reporting period, such as:

- The adaptation of the UN Agenda of the 17 Sustainable Development Goals (SDGs), through the decision for active and effective contribution to the prosperity of the population, the elimination of social inequities and protecting the environment, as well as further incorporating them in the Report, through the connection with the GRI STANDARDS, and the company’s strategy for 2020.
- The actual support of Greek society through the support to innovative ideas, sports, education and the promotion of social solidarity and environmental consciousness, as well as the continuation of the planned expansion of the “Erhomaste Konta” initiative.
- The establishment of the 2020 Strategy which includes 20 specific, quantitative commitments in the four pillars of social responsibility.
- The first “1ou ευWIND Festival” during which more than 1.200 employees, with their families, participated.
- The distinction by the Corporate Responsibility Index for reaching the Platinum level, as well as two awards in the National Customer Service Awards by the National Customer Service Institute.
- The reduction of the total energy consumption, through initiatives in buildings and equipment, by 2.170.253KWh, as well as the saving of 9.270kg of paper through the use of e-bill.

With respect to the observations and the conclusions from the external assurance process, our main observations and suggestions for improving future sustainability reports, are:

- With respect to the principle of inclusivity, WIND Hellas should maintain and aim at further developing its stakeholder engagement and communication model.
- With respect to the principle of materiality, WIND Hellas should maintain the existing processes for the determination of the material issues and aim at further developing them, like, for example, with the increase of stakeholder groups that participate in the workshops for the determination of the material issues.
- With respect to the principle of responsiveness, WIND Hellas should maintain and continue enhancing the existing approach about incorporating the expectations and needs of its key stakeholder groups into products, services and programs it develops.

- WIND Hellas should continue, and aim at further expanding, the use of tools and innovative methodologies to monitor its sustainability performance.
- Due to the increasing importance of managing a sustainable supply chain, WIND Hellas should maintain and continue empowering the incorporation of its sustainability policies into its supply chain and especially during the selection, evaluation and interaction with its suppliers.
- WIND Hellas should maintain and continue empowering its environmental efforts, which are part of its long-term commitment towards environmental protection and responsibility, as expressed, for example, through the monitoring, preservation and reductions in emissions, energy consumption and waste management.

Findings and Conclusions about the Principles

- Principle Of Inclusivity – how the key stakeholder groups were identified and how WIND Hellas communicated with them about issues related to sustainability. The communication activities with the stakeholder groups involved all the key stakeholder groups of WIND Hellas. Also, WIND Hellas has implemented the appropriate principles during the development of its approach towards sustainability.
- Principle Of Materiality – the process of evaluating the sustainability issues in order to select the material ones to be included in the report. The process WIND Hellas followed for determining the material sustainability issues provides a balanced representation of WIND Hellas sustainability performance.
- Principle Of Responsiveness – how WIND Hellas responded to the issues that were of concern to the stakeholders and how this process is described in the Report. WIND Hellas has applied the principle of responsiveness during the selection of the issues to be included in the Report, as well as to the manner to which they are represented in the Report. At the same time, the new 202 Strategy reflects the main issues of interest and concerns of the stakeholder groups, as well as the long-term commitment of the Company towards corporate responsibility.
- Specific Performance Information. The quantitative data related to GRI indicators have been collected and presented in the Report with the best possible and commonly acceptable manner. During the external assurance process, the following indicators were verified, through data and evidence examination and statement confirmation:
 - o The General Standard Disclosures relating to:
 - The company profile (GRI 102-1 – GRI 102-13).
 - The strategy (GRI 102-14 & 102-15).
 - Ethics and integrity (GRI 102-16).
 - Corporate governance (GRI 102-18).
 - The stakeholder engagement (GRI102-40 – GRI 102-44).
 - The reporting practices (GRI 102-45 – GRI 102-56).

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- o The Indicators/Specific Disclosures relating to:
 - The greenhouse gas emissions (Scope 1,2,3), as well as their reduction (GRI 305-1, 305-2, 305-3, 305-5).
 - Energy consumption and energy intensity (GRI 302-1, GRI 302-2).
 - The reduction of energy consumption (GRI 302-4).
 - Data and information about the measurement of electromagnetic radiation, as well as the company's actions regarding the impacts to local communities due to the electromagnetic radiation (GRI 413-1, 416-1).
 - Waste production and management (GRI 306-2, 306-4).
 - Data and information regarding the emissions of ozone depleting substances from the company's activities (GRI 305-6).
 - Confirmation of statements about the non-existence of monetary fines or sanctions regarding non-compliance to environmental laws and regulations (GRI 307-1).
 - Benefits provided to the company's employees (GRI 401-2).
 - The health and safety of employees (GRI 403-2).
 - The number, distribution and characteristics of the Company's employees. (GRI 401-1).
 - Data and information about the company's actions and policies regarding anti-corruption (GRI 205-1, 205-2).
 - Confirmation of statements regarding the non-existence of monetary fines or sanctions about non-compliance to laws and regulations about anti-competitive behavior (GRI 206-1).
 - Confirmation of statements regarding the non-existence of monetary fines or sanctions about customer privacy and personal data, as well as about their management (GRI 418-1).
 - The employee training (GRI 404-1).
 - The percentage of procurement budget towards local suppliers (GRI 204-1).
 - The process and criteria for selecting and evaluating suppliers (GRI 414-2).
 - The customer satisfaction survey.
 - The promotion of diversity and equal opportunities (GRI 405-1).
 - The indirect economic impacts about the development and the impacts of investments in infrastructure and relative services (GRI 203-1).
 - The percentage of activities which include engagement with local communities, impact assessment and development programmes (GRI 413-1).
 - The percentage of significant product/service categories for which the impact to health and safety are evaluated and improved (GRI 416-1).

- o The incorporation of the 2030 UN Sustainable Development Goals in the Report, their connection with the GRI STANDARDS indicators, the initiatives and the Company's goals, as well as the new 2020 Strategy.

Methodology

For conducting the external assurance, the following steps were followed:

- Review and analysis of the processes for identifying and communicating with the company's key stakeholder groups.
- Review and analysis of the process for identifying and determining the sustainability issues that were included in the Report.
- Conducted meetings and interviews, at the company's offices, with selected executives of WIND Hellas which have the operational responsibility for sustainability issues, as well as with members of the Social Responsibility Team of WIND Hellas, in order to understand the administrative structure for managing sustainability issues, the stakeholder engagement process, and the implementation and monitoring of sustainability policies and activities.
- Conducted random reviews and analysis of data and information regarding the basic performance indicators of WIND Hellas. This specific review does not include an evaluation/validation of the operational efficiency of the information systems that were used to collect and process data.
- Reviewed the information and supporting material that support the claims made in the Report.
- Reviewed the Report with respect to the principles of the assurance standard and of the GRI STANDARDS reporting guidelines of the GRI in order to verify compliance to those principles.

Exceptions and Limitations

- Information that relate to the following were not included in the assurance process:
- Activities outside the reporting period or the boundaries of the Report.
- Statements about the positions of WIND Hellas.
- Financial data which were derived from the Annual Financial Report of WIND Hellas which is assured by an external financial auditor.
- Content of websites or tests by third parties.

Responsibilities of WIND Hellas and the External Assurance Provider

The preparation, presentation and the content of online versions of the Report is an exclusive responsibility of WIND Hellas. CSE's responsibility is to provide independent external assurance to the stakeholders about the accuracy, reliability and objectivity of the information contained in the Report, and to express a holistic opinion with respect to the scope of work as it is defined in the present assurance report.

CSE recognizes the need for a thorough, transparent assurance process in order to ensure reliability, and act as a tool for improving the performance of WIND Hellas about the company's sustainability strategy and reporting. This is achieved by providing unbiased commentary, through the present assurance report, on the reporting process, and by making recommendations for further improvement.

Independence, Impartiality and Competence Statement of CSE

CSE, and the external assurance team, confirmed to WIND Hellas that it has maintained its independence and objectivity and, specifically, that there were no incidents and no services provided that could influence its independence and objectivity.

CSE's external assurance team has extensive international knowledge in providing assurance services, conducting audits and evaluations of issues and systems relating to the environment, the society, the employees, the recognition and communication of stakeholder groups, the determination and representation of material issues, and through the combined experience in this field, an excellent understanding of good practices in sustainability and in external assurance.

On behalf of the Assurance Team
George Markezinis



CENTRE for SUSTAINABILITY
and EXCELLENCE



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Photos

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Paper

The papers used for this Sustainability Report are certified under the **FSC (Forest Stewardship Council)**, an International Non-Profit Organization to ensure the exploitation of forests in a sustainable way.

We thank you for reading this report.
Should you need more information
or clarifications please contact:

WIND Hellas

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