

SUSTAINABILITY REPORT 2013



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1 Message from the Chairman of the Board & CEO



Nassos Zarkalis
Chairman of the BoD & CEO, WIND Hellas

Dear friends,

Looking back at 2013, I would like to share with you some thoughts. The strenuous financial and social conditions that widely affect us bring forward a pressing need for changes that go far beyond the economy. These are changes that touch upon every aspect of our public life, the first priority being to redefine our value system towards a viable future. Such redefinition requires the active participation of businesses.

As we mature deeper in the crisis, it is becoming increasingly obvious that beyond the financial and operational reforms, the new production model will be sustainable in the long term only if it's coupled with new business ethics. This is true for all the sectors of our economy, including telecoms, in spite of the fact that in the past our sector has largely functioned within a healthy growth model setting itself apart from ill phenomena.

Our "good" legacy actually provided us with the necessary reflexes to adapt quickly and successfully to the new conditions, as we did. I am proud of the fact that in a recessionary environment, WIND Hellas continued to invest, expanded and modernized its infrastructure, offered consumers quality services at very competitive prices and excelled as a Corporate Citizen.

But is this sufficient in order to create a new sustainable business paradigm? This question preoccupied us during much of 2013, serving as a springboard to get us more steps ahead. As a result we rolled out a bold strategy aiming to establish value for all our stakeholders, not only today but also in the long run.

By believing in the power of synergies we reached an agreement with Vodafone Hellas to partially share our mobile networks. Although this cooperation affects only a part of our networks, mostly in regional areas and less in urban ones, it constitutes a structural change in the Greek business model that I think other sectors should also consider.

Synergies among competitors are feasible and when they happen, they foster openness, maximize investments and renew our capabilities to offer more and even better services.

At the same time, we looked at our whole industry with an increased sense of responsibility.

The current fragmentation in telecommunications, a result of unregulated growth, is not sustainable and in the long term it will damage fair competition and consumer's benefits. WIND Hellas, as one of the major telecom players, promotes concentration and has already strategically invested in order to contribute to the necessary transformation of our industry. It is the only way to face the major changes engendered by technological and economic developments.

Our responsibility towards sustainable growth and entrepreneurship is not in any way limited to these strategies. Please go ahead and read in this report about our numerous Corporate Responsibility activities which bring us closer to the Greek society. However, over and above these actions, our responsibility lies with our business ethics and the culture we built in our organization. This is a culture of Excellence by which we work every day in all aspects of our operations making sure there is fairness, transparency, meritocracy and efficiency in whatever we do. We wish to excel ourselves and promote Excellence as a standard for business and social behavior in our country.

Having said that, do I believe that we hold all the answers in our hands? Certainly not. But I am convinced that we had a good start and we are going forward in the right direction.

2.

2013 What we accomplished

1/2013 The new Corporate Mission and the Values of WIND was formed.

2/2013 WIND launched its partnership with Greek Safer Internet Center and SaferInternet.gr action (www.saferinternet.gr) which is under the auspices of the European Commission.

2/2013 WIND enters strategic agreement with Vodafone Greece, in order for the two companies to develop a partially common network of mobile telephony base stations across Greece.

4/2013 Creates "myWIND", the new online platform for subscription and account management, which offers a concentrated and complete picture of all the connections of the subscriber.

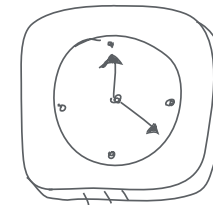
5/2013 WIND as a sponsor supports the new Road Race Program RUN GREECE organized by SEGAS in five cities of Greece in cooperation with local and regional government.

6/2013 Offers the new Business Antivirus service to companies and professionals.

6/2013 The new W contract came to the market for unlimited communication to all networks.

6/2013 WIND launches to the market the new applications My F2G and MyQ, offering quick and easy account management for F2G and Q users.

10/2013 Presents the new F2G packages, since 200 minutes to all networks cost only €5 for the first time in the Greek market, providing packages with only €2 for extra talktime, SMS and MB.



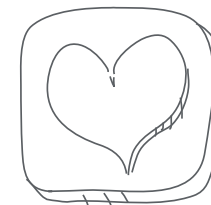
16.502

training hours
in employee
programs



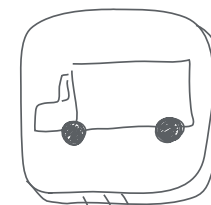
12,78%

reduction
of the total energy
consumption



116.000€

to 8 NGOs through
the action movement



54

largest suppliers
evaluated in the
context of responsible
procurement



3

additional policies
adopted to avoid
conflicts of interes

3.

WIND Hellas Communication for All

WIND Hellas is today the only Greek telecom Company that offers its subscribers mobile, fixed telephony and Internet in one complete package, from one point of sale and service and with one account, having designed solutions and products For All.

The main feature of WIND products is the ideal value/cost relationship that ensures economy for all its customers, according on their communication needs.

The company was founded in 1992 and launched its operations in the Greek market in June 1993, when a first call from a mobile phone in our country was made through its network. During the 21 years of its operation, WIND introduced innovative products that changed the data in the field of consumers' communication.

2007 marked a new chapter to the history of WIND since it acquired the fixed telephony & Internet company, Tellas and then consolidated the mobile and fixed networks creating the unique unified telecommunications network in Greece.

In 2013 WIND 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.

3.1

Financial Growth & Feature Figures

During its course, WIND was one of the largest private investors in Greece, as it realized investments amounting 2,6€ billion in technological infrastructure, thereby creating tangible and intangible value for the economy and the country.

The wider economic footprint of WIND in the Greek economy is also important, since it is estimated that only during the last three years the Company together with its ecosystem has contributed more than 3,7€ billion government revenues. Respectively, for the same period, the direct and indirect contribution of WIND in employment income exceeded 670€ million.

WIND is totally owned by Largo Limited holding company, which determines the strategy and development plan of the Company.

WIND Hellas' shareholders are six of the largest investment funds worldwide. By investing in WIND Hellas they practically showed their faith in the growth prospects of the Company, as well as the ability of the Greek economy to recover.

Feature Figures

	2013	2012
Turnover	525,3 million€	613,7 million€
Investments	54,3 million€	65,0 million €
Social insurance cost	9,0 million €	9,6 million€
Total financial liabilities	483,4 million€	642,5 million€
Total equity	65,3 million€	11,1 million€ ¹
Total assets	892,4 million€	1.038,6 million€

2013



2012



¹Restated in 2013

3.2

Recognition

Evolution Awards

Aiming to offer economy, technology and service to its customers through its official webpages: www.wind.gr www.f2g.gr and www.myq.gr, WIND stood out for another year in the “**Electronic Communication & Marketing**” category winning three SILVER awards at the institution of E-Volution Awards.

- ✓ Design & Aesthetics for the F2G webpage
- ✓ Search Engine Optimization (SEO) & Search Engine Marketing (SEM) for the F2G webpage
- ✓ CPC campaign for WIND





BRAVO Institution

WIND Corporate Responsibility Report stood out as one of the 6 best Reports totally in Greece in the context of the BRAVO institution, organized by the QualityNet Foundation (QFN), under the auspices of the Ministry of Development and Competitiveness and the Ministry of Environment, Energy and Climate Change.

More specifically, 2012 WIND Corporate Responsibility Report was awarded in the following categories:

- ✓ Consumers & Market
- ✓ Environment
- ✓ Labor relations
- ✓ Society
- ✓ Best overall report

National Corporate Responsibility Index

Our company won the **SILVER award** for its performance in Corporate Social Responsibility based on the criteria of the international corporate responsibility measurement index, CR Index. Furthermore, WIND was the only company that received the **special award "Best Award New Entry"** for the high score with its first participation in the evaluation index.

CR Index (Corporate Responsibility Index) is the most important international index measuring the performance of companies in the Corporate Social Responsibility field (CSR) in four specific areas: Society, Environment, Employees and Market. The idea was developed by the nonprofit organization BITC, which operates in the field of Corporate Social Responsibility, chaired by the Prince of Wales.

Retail Business Awards

WIND won the **CSR RETAIL STRATEGY 2013** award, best CSR practice, under the 12th **Retail Business Awards** organization for the CSR campaign it implemented in the context of the city Road Races «**RUN GREECE**». The campaign, which was conducted via WIND stores in Heraklion – Ioannina – Kastoria – Larissa – Patras, from April to October 2013, stood out among this year's nominations of retail companies that invest in CSR programs.



3.3

Participation

WIND Hellas, believing that its participation is strategically important for the progress of the industry through the exchange of expertise, as well as the Sustainable Development issues, participates in associations and international/national organizations in which:

- ✓ It has positions in governance bodies
- ✓ It participates in projects or committees
- ✓ It provides substantive funding apart from regular membership

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

✓ Bodies for Sustainable Development:

- ✓ Greek Network of the United Nations Global Compact
- ✓ Hellenic Network for Corporate Social Responsibility
- ✓ Institute of Communication
- ✓ Council for Sustainable Development of the Federation of Enterprises and Industries
- ✓ Saferinternet.gr

✓ Professional Bodies:

- ✓ Greek Mobile Operators Association (EECT)
- ✓ Hellenic Federation of Enterprises (SEV)
- ✓ Athens Chamber of Commerce & Industry
- ✓ Federation of Hellenic ICT Enterprises (SEPE)
- ✓ European Competitive Telecommunications Association (ECTA)
- ✓ GSM Association Europe
- ✓ Greek e-Commerce Association (GR.EC.A.)



4.

Responsibility in Action, for All

According to our Corporate Responsibility strategy, it is our priority to adopting responsible policies and practices in the context of our operations. The integration of international principles in our operations, as set in the UN Global Compact, which we have signed since 2008, as well as our Company's key commitment, expresses in the best way the defense of Responsible Entrepreneurship.

2013

WIND Hellas knows the important role that our sector plays in the Greek economy and society, as well as the importance of our stakeholders in the context of accomplishing our business goals, which is why we are improving our performance, while at the same time we are establishing our long term sustainability, taking into account the aspirations and expectations of our stakeholders.



- 🔊 We published our **seventh Report** and proceeded to external assurance of the implementation level according to the GRI standard. In addition, **we expanded the internal verification of our Report on additional indices in the Environment and Health & Safety section.**
- 🔊 We **developed the dialogue** with our stakeholders, activating specific tools.
- 🔊 We participated in events that promote Responsible Entrepreneurship and Sustainable Development throughout the year, such as the annual conference of the Economist, TEDx Academy, BRAVO Institution, and Infocom World.
- 🔊 We transferred the data and information of the Report to the digital platform by creating the interactive section for our stakeholders, in order to offer them immediate and reliable update.

4.1

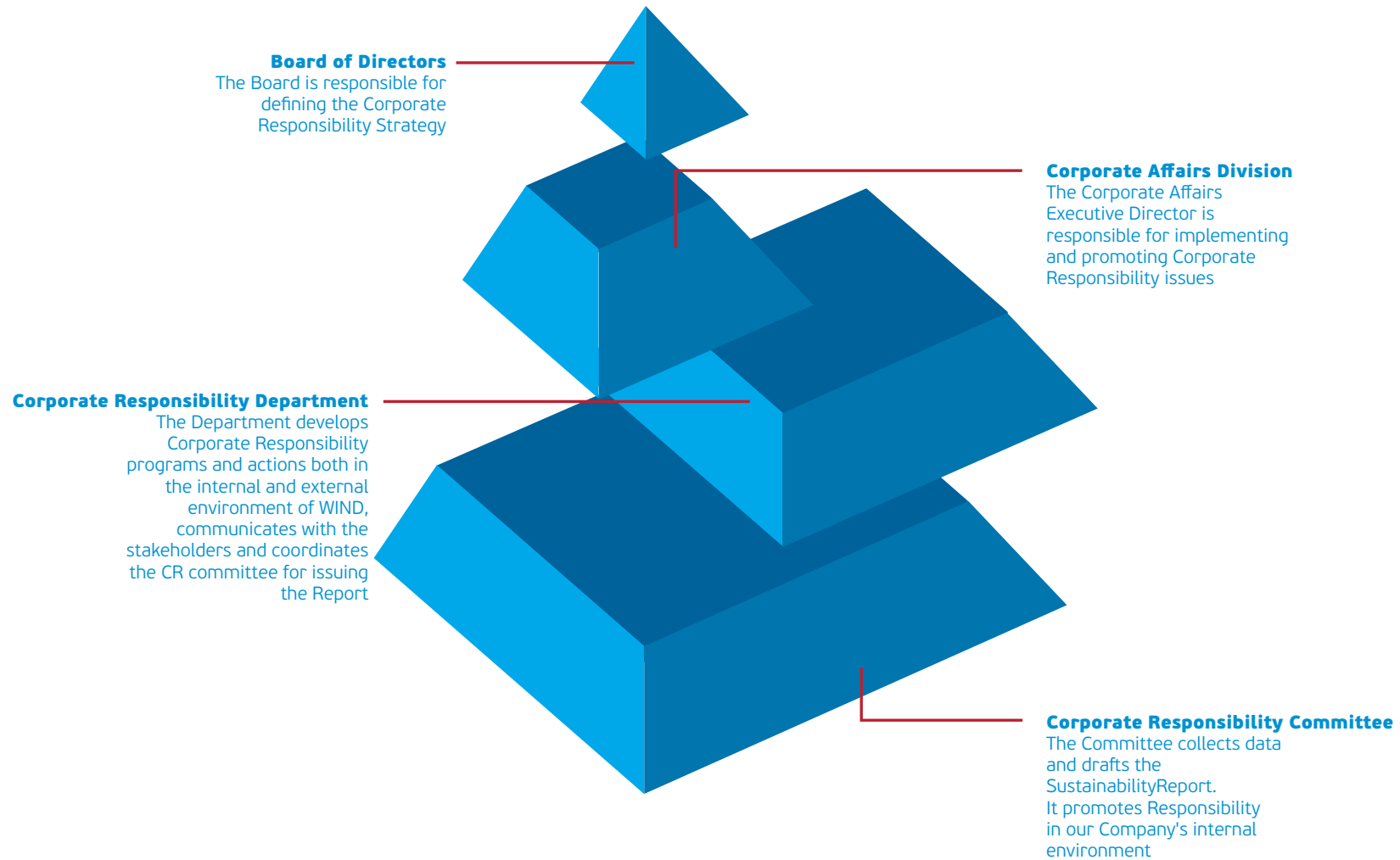
Our approach to Responsibility

Our long-term commitment to Sustainable Development is totally reflected in our internal environment, through the actions we develop, the goals we set and the evaluation of our results on an annual basis.

4.1.1

The Governance structure of our Corporate Responsibility

The Corporate Responsibility strategy is integrated in our development strategy and our evolutionary procedures, making it a priority of our operations. Our objective is to promote social progress, economic growth and respect for the environment, operating in an ethical and responsible manner.



4.1.2

Our Corporate Responsibility strategy

The Corporate Responsibility strategy we have adopted at WIND Hellas, is expressed through the program “**In Action**”. Our aim is to apply our responsible strategy to our business activity, our people, the environment and society.

Thus, we are committed to:

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, emphasizing in reduction of energy consumption, recycling and development of our network infrastructure in an environmental friendly manner.

EMPLOYEES

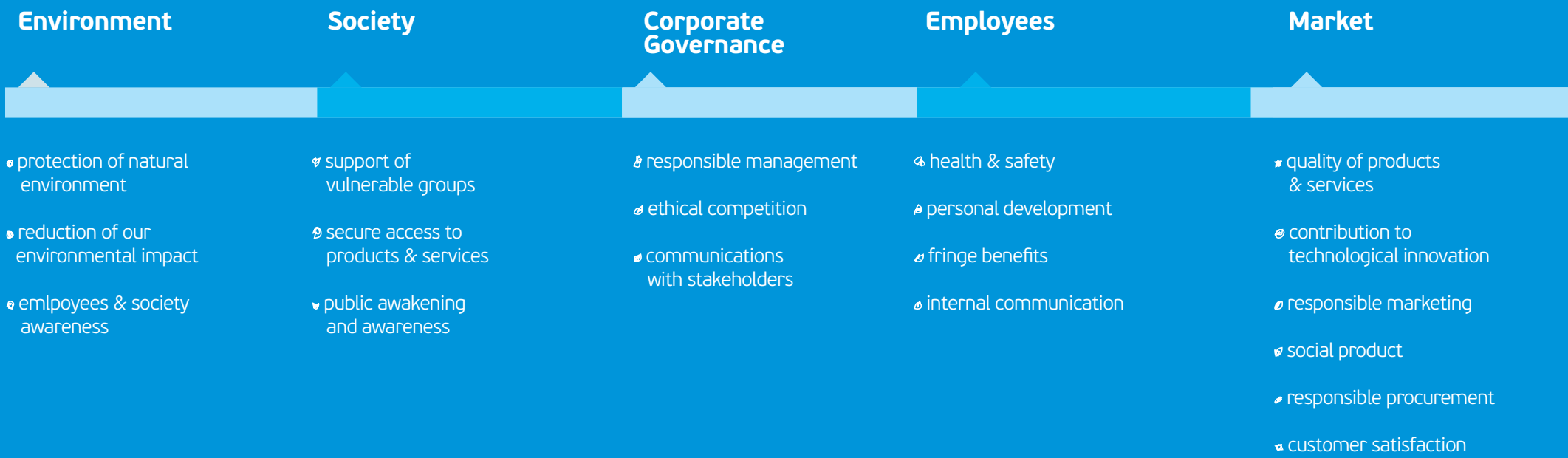
We inform and mobilise our people, urging them to work as volunteers and become ENGAGED CITIZENS.

SOCIETY

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



Our responsible commitment is reflected to our Report according to the priorities we have set to our business operation and taking under into account the opinions of our stakeholders about our impact per axis. The result of this combinational approach defines the severity and extent of their reference in the Report, according to the following diagram of our responsible operation.

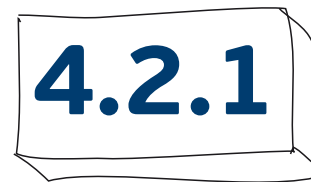




Our Stakeholders

Our stakeholders 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, which we follow up on an annual basis.

Our stakeholders either belong to the internal environment of the Organizations (**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.

Once a year, the Corporate Responsibility Department, after checking the information obtained on the basis of the reliable mechanism for comments and reviews that we have developed, taking into account the objectives of the Company, prioritizes the important issues for our Company and, afterwards, proceeds to the development of the dialogue plan with our Stakeholders.

Our ongoing dialogue highlights issues and shapes proposals which subsequently give rise to actions, through which the Company tries to respond to opportunities and challenges that appear.

Our seventh in a row Sustainability Report of this year, which is a tool of update and dialogue with our audiences, demonstrates our firm commitment to transparent and continuous information.

Table of Dialogue Development with our Stakeholders 2013

External Environment	Stakeholders	Tow-way Communication	Priorities – Dialogue Issues
	Regulatory Authorities	Participation in consultations (1) Participation in researches (1) Participation in conferences (1)	Network Infrastructures & 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)	E/M Radiation Economic Development Environment Investments in Technology and Infrastructure Supporting the Local Economy, Society, Cultural and Educational Institutions
	Customers (Individuals – Business Services)	Customer Satisfaction Surveys (2) Focus Groups (5) Customer Service Center (1) On line Communication (1) Complaint Telephone Line (1)	Technical Issues on Products & Services Communication Coverage Quality of Services Telecommunication Charges E/M Radiation
	Academic Community	Support to Scientific Programs (1) 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 & Presentations (1)	Management Financial & Commercial Results Regulatory Matters Quality of Services & Network Coverage Infrastructure, Technology & Innovation Social Contribution Environmental Operations
	Suppliers	Working Visits (4) Participations in Industry Associations (5) Ongoing Information & Support (1)	Procedural Matters Financial Matters Timely Delivery Safe Delivery Conditions for employees

Internal Environment	Stakeholders	Tow-way Communication	Priorities – Dialogue Issues
	Shareholders	Scheduled Shareholders Meetings (1) Targeted Communication (2) Conference Calls (2)	Financial Growth/Results Management Investment Plan Strategic Choices Socioeconomic Developments
	Employees	Employees' Opinions Surveys (4) Newsletter Eco News (3) Intranet (1) Organization of Events (3) Meetings with Employees Union (1)	Education Health & Safety Equal Opportunities of Professional Development
	Commercial Network	Extranet (Communication System) (1) Commercial Conferences(3) Meetings with Sales Executives (2) Ongoing Information & Support (1)	Corporate Governance Sharing Knowledge & Good Practices Initiatives for supporting local community needs Training in New Products & Services Customer Service Recycling, Objectives & Ecological Awareness

1 On an ongoing basis

2 Regularly

3 Periodically (2-4 times a year)

4 On an annual basis

5 On a case by case basis



BRAVO 2013: Dialogue for Sustainable Development

One of the tools of dialogue between our Company and our Stakeholders on issues developed and presented in this report, is our participation in BRAVO institution, organized by QualityNet Foundation.

This institution facilitates the dialogue on Sustainable Development between Organizations that issue reports and the key Stakeholders, regarding the completeness and importance of the issues presented. Representatives of academic, institutional and business bodies, local government, the press and various NGOs participate in this institution. This year, through the Corporate Dialogue, the issues that emerged as the most important for the groups of Stakeholders involved, as prioritized:

- Investment & Innovation
- Education & Development of Employees
- Reduction of Energy Consumption
- E/ M Radiation
- Transparency & Meritocracy

The dialogue results are taken into account in the context of the ongoing improvement of our Company. References can be found in the respective sections of our Report.

Surveys

We conducted customer satisfaction survey, which presents the results in a bimonthly basis. The findings of this study enable us to design interventions and corrective actions, so that customers are always satisfied with our services and products.





Furthermore, in late 2013, the survey for the image of telecommunications providers was designed and implemented. This survey offered valuable «insights» on how consumers perceive us, what are our strengths as well as what points need to be strengthened, always for the benefit of the consumer.

During the period from 24/11/2013 until 09/12/2013, the first Employee Survey in the franchise WIND Store network was conducted. The objective of the Survey was to highlight the issues that concern the employees and improve their everyday life. The results of the survey were evaluated immediately and action plans were created for each individual field that was thought that needed improvement.

4.3






We Approach Important Issues Responsibly

The prioritization of the Corporate Responsibility issues according to their importance to the Company, our Stakeholders and the wider Environment results from:

-  the dialogue with the Stakeholders
-  the collaboration with Authorities & Organizations
-  the study of Competitors' actions at European level
-  the recorded needs at local and national level



The issues that raised in 2013, to which we responded with specific actions, which are presented in the individual chapters of the Report, related to:

-  **Corporate Governance:**
Communication of the Principles of the Code of Conduct
-  **Employees:**
Personal Development and Education
-  **Society:**
Volunteerism and Social Solidarity
-  **Market:**
Simplification of Customer Service
-  **Environment:**
Reduction of Energy Consumption

4.4

We Promote Responsible Entrepreneurship & Technological Innovation

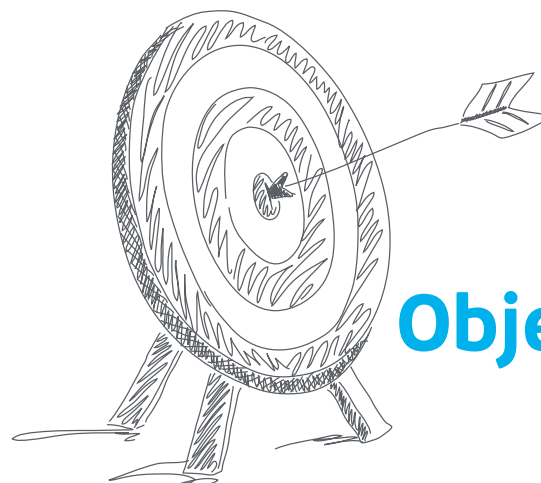
We actively participate in conferences that promote issues of our industry, the Greek economy and Sustainable Development as well as technological innovation, in Athens and the Greek region. In 2013 we supported:



(Snapshot from) Bravo Institution



(Snapshots of) the speech of the Prime Minister, Antonis Samaras, at ACCI awards 2013.



Objectives 2014

- Publication of the 8th Report in accordance with the latest guidelines, GRI G4.
- Training of the CR Team for the implementation of the new guidelines of the GRI in the Report for 2014.
- The use of the new tools for social investment measurement, SRI (Social Return on Investment).
- Further development of the dialogue with our Stakeholders.
- The Improvement of the social profile of the company on a national level by strengthening corporate responsibility activities.

5.

Corporate Governance

We operate with transparency and respect for the laws, incorporating responsible management practices and creating a reliable labor environment, in order to ensure our response to the expectations of our stakeholders.



2013

Being faithful to our commitment for Responsible Entrepreneurship, we proceeded in 2013 in carefully planning our actions, through responsible practices, audits, evaluation of our daily operations, and adopted new policies and practices in order to simplify our procedures and respond more efficiently to our customers.



- ✓ We adopted 3 additional policies to avoid situations of Conflict of Interest in the context of the Code of Conduct
- ✓ We implemented more than 25 simplifications in our procedures, recognizing the benefits of the value of simplicity and actively involving our employees
- ✓ We adopted the new Corporate Culture, shaping our new Vision
- ✓ We forwarded our «WIND Hellas Code of Conduct» to our suppliers and partners, and our employees have direct access through our website

5.1

Responsible Management

WIND Hellas is a Company with Vision and clear Mission. Recognizing the fact that telecoms sector 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.

In early 2013, the new Mission of WIND was drawn, which led to the new Corporate Culture. Our Corporate Values support its implementation, taking also into account the wishes of the employees for a better labor environment.

Our Commitment

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

Our Values

- ➔ **Integrity**
I always do the right thing, whatever the cost, with honesty and justice for all.
- ➔ **Simplicity**
I keep aside anything unnecessary and keep the essence of everything I do.
- ➔ **Flexibility**
I am quickly and effectively adjusted to market challenges.
- ➔ **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 confidentiality of telecommunications and to protect the environment.

Our Policies are posted in the workplace and stores of our Company. They are also available to every employee through our intranet and to the public through our official website, www.wind.gr.

☯ **Quality Policy:**

describes the vision, the mission and the values of our Company, which are applied throughout its operations.

🌱 **Environmental Policy:**

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

☯ **Quality and Environmental Policy for WIND Stores:**

describes the vision and the commitment of our Company to offer to its customers' high quality services and products and high quality service through the extensive nationwide chain of WIND stores, with respect to the customer, society and the environment.

📡 **Quality Policy on Electromagnetic Radiation Measurements:**

describes the commitment of the Company to provide services, tests/measurements, as well as assistance to the demands of our customers and our stakeholders, in compliance with the legislative framework and the internationally accepted practices and standards.

🔒 **Data Security Policy for the Protection of Privacy of Communications:**

in accordance with the current regulatory framework and upon approval by the Authority of Communication Security and Privacy, we apply internally and impose to our contractual relationships with the 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.








Management Practice

WIND Hellas is a Société Anonyme. According to its Articles of Association, the supreme body of the Company is the General Meeting of the Shareholders, which may reach to decisions on any matter pertaining to the Company. The management and representation of the Company and the management of its corporate assets fall under the remit of the Board of Directors, which may consist of three (3) to fifteen (15) members.

Board of Directors

The current Board of Directors (BoD) of the Company, which was elected in January 2011, 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 2013, the BoD was comprised of the following members:

-  **Athanasios Zarkalis,**
Chairman and CEO, Executive Member
-  **Ioannis Palaiochrassas,**
Independent, Non-Executive Member
-  **Georgios Rallis,**
Executive Member

The Company's Articles of Association, as in effect today, does not distinguish between "executive" and "independent – nonexecutive" Board Members. However, and in accordance with the Company's BoD decision dated 24.01.2011, which established the incumbent BoD into a body, the BoD members are distinguished into executive and non-executive members; specifically, two Executive Members and one Independent-Non Executive Member sit on the BoD.

The BoD members are chosen on the basis of their sensitivity to economic, environmental and social issues and their primary obligation and duty is to continuously strive to improve the Company's economic position on the telecommunications market and to protect corporate goals and prospects. At WIND Hellas, we operate in a context of transparency, with pertinent limitations and commitments for Senior Management set forth in our Articles of Association.

Therefore, in accordance with 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.

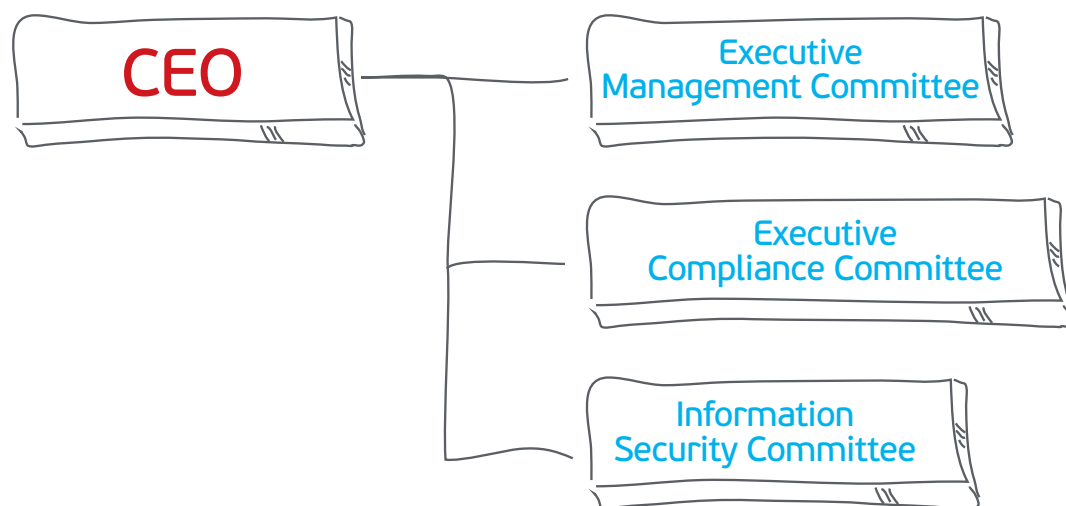
Communication with the Management

The constructive two-way communication between Employees and the Board of Directors helps 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 2013, the CEO met weekly with executives from all departments in the Company.

Similarly, in order to decide on a strategy for relishing 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.

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 oversight, dealing with problems that may arise and drafting individual strategies, always in consistence with the decisions of the Board and the general authorizations, given by Largo Limited, the parent company of the Company.

Executive Compliance Committee

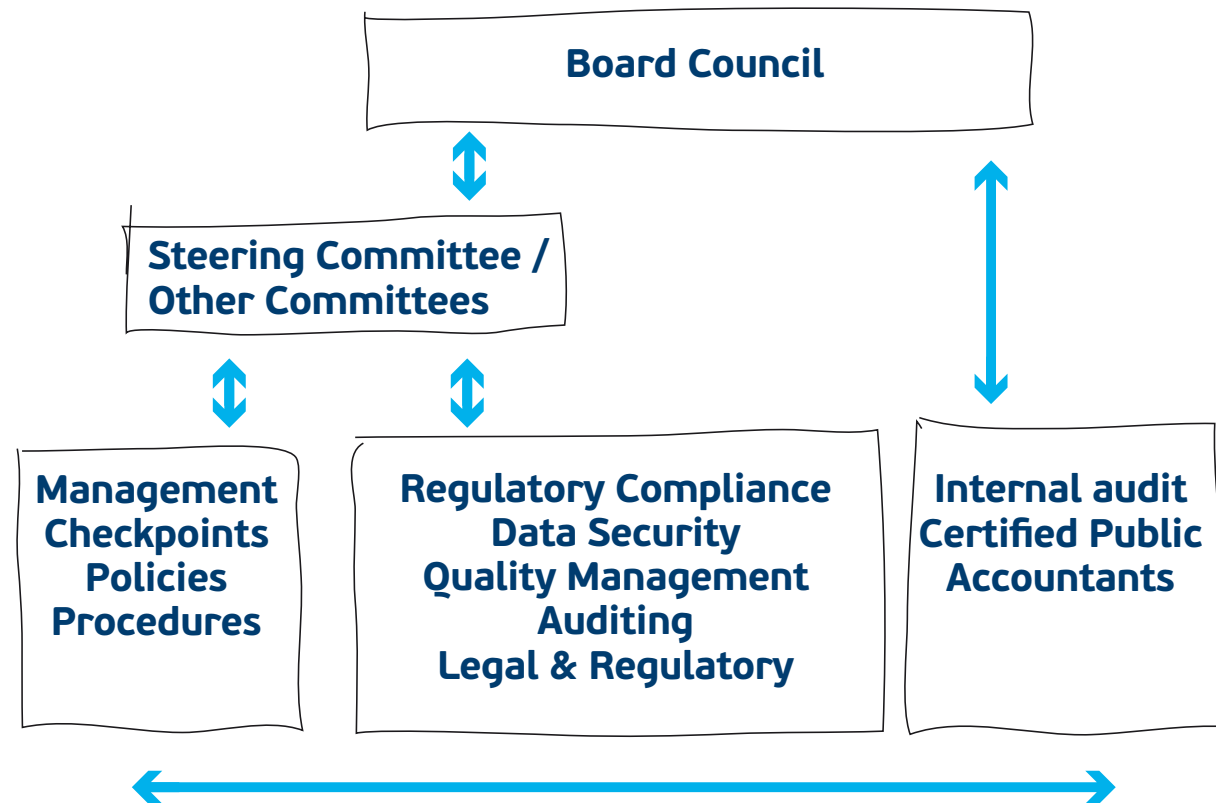
An executive Compliance Committee, which consists of members of the Senior Management, with main aim to oversee WIND's Compliance Management System. It deals with compliance issues affecting internal and external functions of the Company with respect to its principles and values, the implementation of the Code of Conduct as well as issues of corporate governance.

The Committee met in 2013 2 times on issues related to the implementation of the Code.

Information Security Committee

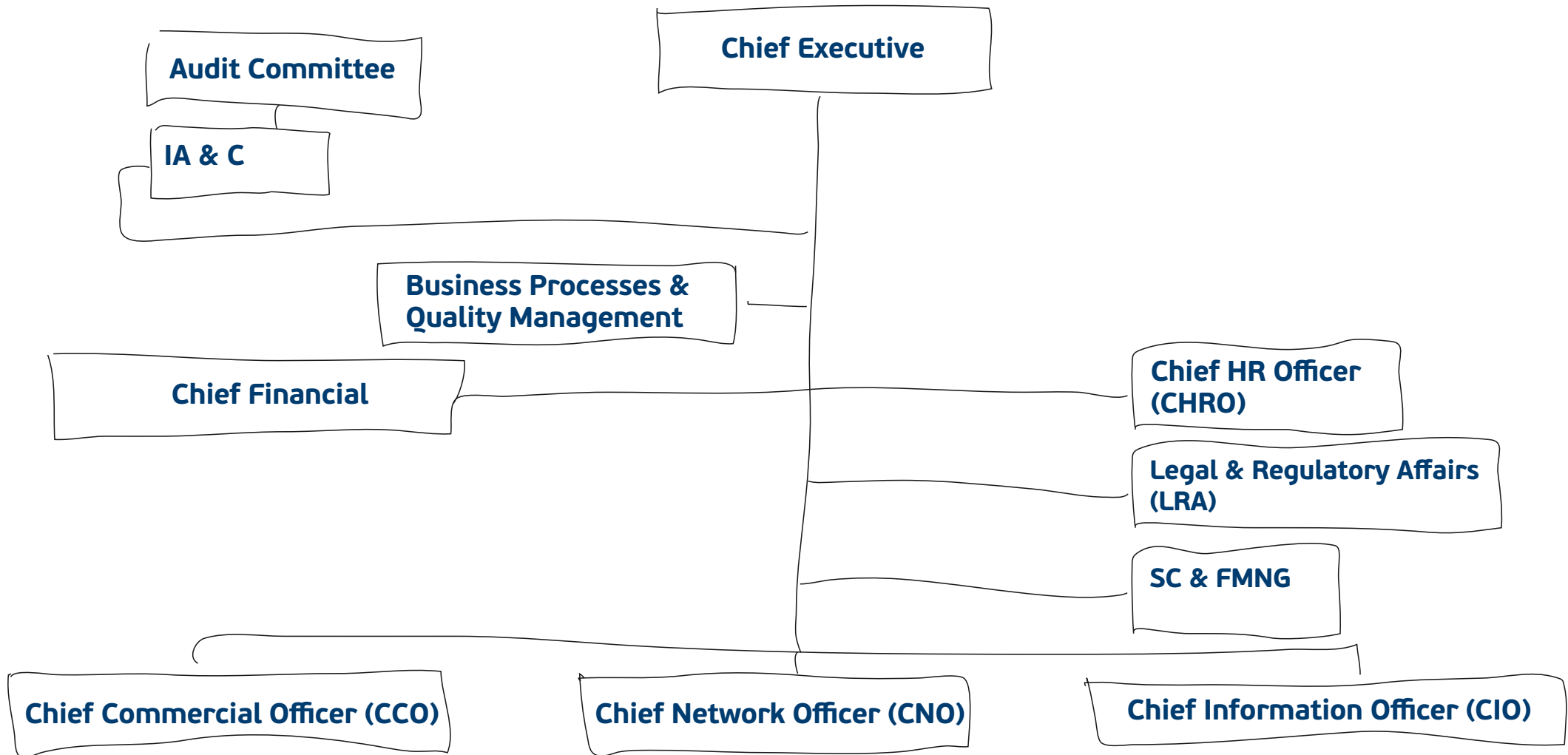
The Committee meets at regular intervals aiming to the creation of a corporate Information Security Policy and its implementation by the employees, in order to ensure security, confidentiality and integrity of information. The Committee is the central body of the company that manages the Information 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 2013 2 times on issues related to the implementation of the Information Security Policies and the new Regulatory requirements.

Corporate Governance Structure



5.2.1

Organizational Structure





Internal Audit

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

Management is responsible for designing and operating the internal audit system, while line Managers are responsible for establishing the appropriate policies and procedures in order to assist the Company in achieving its predetermined objectives.

Through the **Audit Committee**, the parent company Largo Limited, which consists of 3 independent non-executive directors, 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 Manager meets monthly the Chairman of the Audit Committee for 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 assessment in order to identify the operational risks and draw up the annual audit plan. Risk identification and risk assessment is performed and specific processes where audits will be made are defined according to the annual plan of the Division. Audit reports resulting from the conducted audits are submitted to **Senior Management** and the **Audit Committee**.



5.4

Conflict of Interests – Tackling Corruption

By conflict of interests we mean any professional situation in which the private interests of an employee are able to influence or challenge, at least potentially, the objective exercise of its professional duties.

Thus, in order to avoid conflict of interests and prevent corruption indicators, there is a provision of specific measures, audits and approvals, through the procedures and guidelines that we implement. The procedures are accessible to all employees via the Company's corporate website.

In addition, an important part of the functions of the Company is subject to extensive audits undertaken each year for the evaluation among others of the operating risks related to corruption.

5.4.1

Code of Conduct

We operate under the “**Code of Conduct of WIND Hellas**”, 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 created 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 **Mailbox: WIND Hellas PO Box 61336 151 04 Maroussi, Athens, Greece**. In 2013, 3 reports were sent by mail or email. The expected internal investigation procedures were followed and there was no violation of the Company's policies or intention not to apply its values and practices.

During the year, in the contexts of the Code of Conduct, we adopted the following policies:

Conflict of Interests Policy: The purpose of this Policy is to describe the principles that have been adopted in regard to the management actual and potential conflict of interests.

Gift Acceptance Policy: The purpose of this Policy is to describe the basic principles of behavior 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:

- ➊ awareness of our employees regarding the meaning and prevention of fraud,
- ➋ guidance for what they have to do in case they perceive similar cases or suspect that similar acts are committed, so that a single operational behavior and culture is formed on how to prevent and deal with them,
- ➌ description and definition of the relevant actions that must be taken by the competent bodies in case of a fraud incidence, and
- ➍ facilitate the development of systems, procedures and control mechanisms that help to prevent and combat fraud.

5.4.2

Internal Labor Regulation

The transparency and integrity in the way we operate is described in the Internal Labor Regulation we have prepared and apply. This regulation promotes moral values, respect for laws and good business practices and the creation of the appropriate labor environment. The Internal Labor Regulation is accessible to all employees through our corporate intranet (WIND Intranet).



5.5

Procedures, Management Systems & Certifications

5.5.1

Procedures

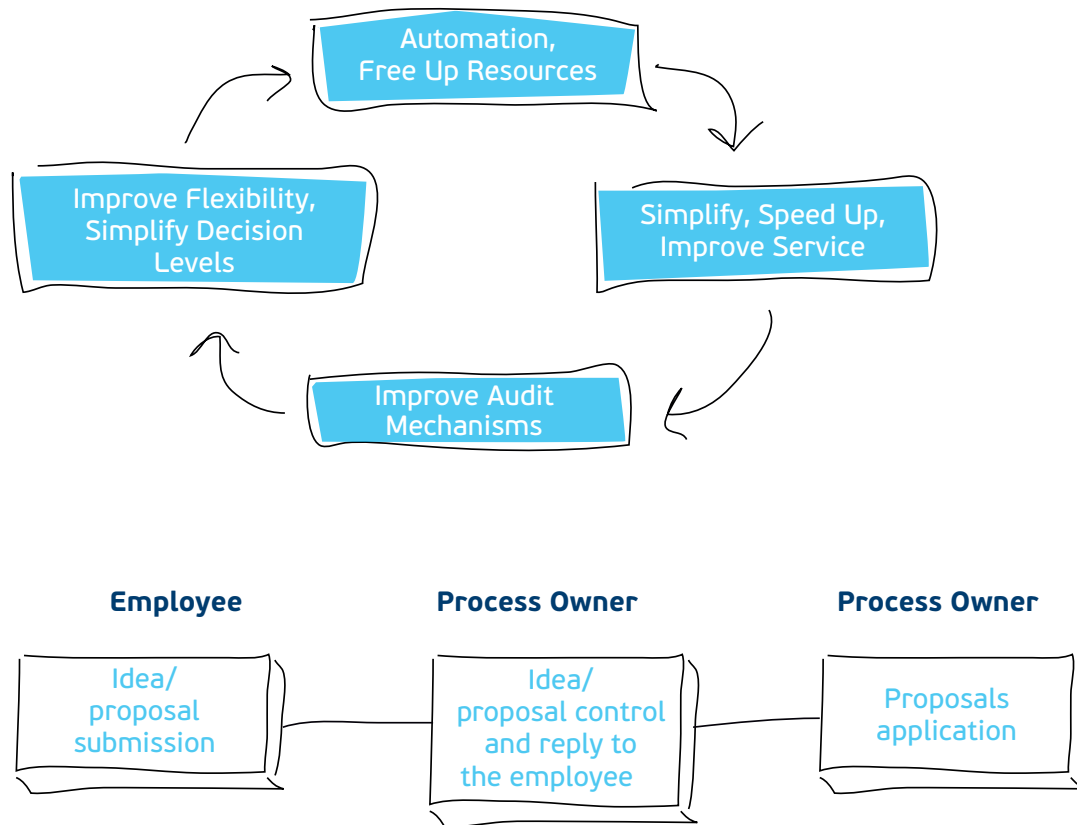
Recognizing the benefits of the value of simplicity in everything we do, we extended in 2013 as well our efforts to simplify our procedures, thereby achieving an increased efficiency and effectiveness in the service of our internal and external customers.

In conjunction with the creation of a new corporate culture, we implemented more than 25 simplifications mainly in those procedures that improve the customer experience at points of contact with the company (customer service procedures in stores and call center, procedures and promoting performance deals, etc.), but also those that will make employers everyday life easier, such as Human Resources procedures (timing, approval of absence, leave, travel, education, etc), the Facilities Management procedures (access to premises, issuing access cards, etc.), the installation of hardware (computers, laptop, etc) and software, providing additional automation.



We simplify our procedures.

We become more efficient!



Aiming to an even greater employee involvement to the simplification of our procedures, we created in May 2013 the program «**see things simply?**».

The objectives of the program were:

- encouraging responsibility for the simplification of the procedures
- strengthening of bottom-up communication
- generating of new ideas to improve our everyday work
- strengthening the commitment to improvement
- simplification of our procedures

The program mobilized a large number of employees either to send simplification ideas or to study, communicate and apply the ideas that were collected.

As part of the program, over 180 recommendations gathered and studied, while most of them either implemented during 2013, or their implementation is in progress.

Through the program, the 4 best ideas were awarded, which we presented to the Management Team.



5.5.2

Management Systems

In order to meet the needs of our customers and improve their experience in combination with the protection of the environment and good use of natural resources through our business activities, we have developed and implement 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 telecommunication products and services (mobile and fixed telephony, data, internet and broadband) for private and corporate customers,
- ✓ design, development, realization, operation, support and maintenance of telecom & IT infrastructure, telecom and data networks, IT systems and applications,
- ✓ design, development, monitor, audit and support of our WIND 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 & 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 according to the requirements of the following international standards.



 **Quality:** EN ISO9001:2008

 **Initial certification:**

June 2001

 **Certificate Registration No.:**

04 100 011460

 **Last certification renewal:**

March 2011

 **Certification Body:**

TUV Hellas (TUV Nord Group)



 **Environment:**EN ISO14001:2005

 **Initial certification:**

December 2008

 **Certificate Registration No.:**

44 104 090360-000

 **Last certification renewal:**

June 2012

 **Certification Body:**

TUV Hellas (TUV Nord Group)

Management Standard: ELOT EN ISO/IEC 17025:2005
Frequencies Measurements Laboratory

Initial certification: June 2012
Certificate No. 818

Certification Body: Hellenic Accreditation System (ESYD).

In June 2013, the Laboratory was successfully inspected by ESYD in the context of the annual monitoring of compliance with the requirements of the standard.

5.5.3

Business Continuity Management

At WIND we have developed and we always improve a **Business Continuity Management System** with the following main objectives:

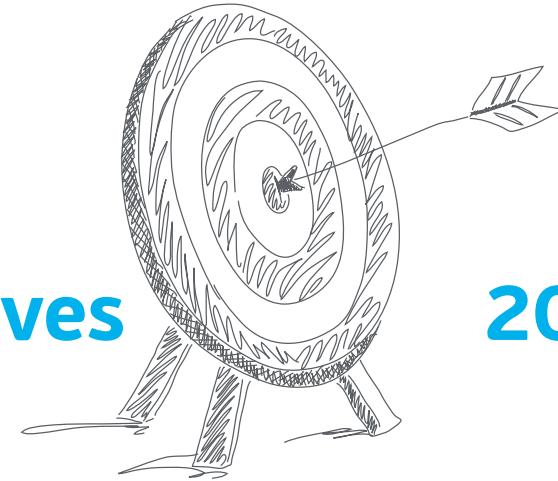
- to ensure the safety of our employees, our partners and our customers
- to ensure the integrity of our infrastructure
- the uninterrupted supply of services to our consumers
- the compliance with legal, regulatory and statutory requirements

In the context of our system, as well as the regulatory obligations arising from Gov. 305/14-2-2012 (EETT: Decision No. 7560/153) and 1742/15-7-2013 (ADAE: Decision No. 205/2013), we apply policies, procedures, measures and plans that help to ensure the continuity of supply of our services.

At the same time, and recognizing the importance of ensuring the availability of telephone services to the public, we developed channels of communication and we actively participate in the social dialogue with all relevant bodies, suppliers, other providers and regulatory authorities aiming to the uninterrupted access to emergency services and other telecommunication services, particularly in cases of destructive damage or force majeure.

Objectives

2014



Business Continuity:

- harmonization of our Business Continuity Management System with the constantly evolving environment of telecommunications and the international standard ISO 22301:2012 (Societal Security Business Continuity Management System).
- to conduct information programs to strengthen our culture and to promote the active participation of our employees and taking responsibility in relation to business continuity.
- Re-certification of our Quality Assurance System in accordance with the requirements of the international standard ISO9001:2008.
- Further simplification of our procedures, in order to put aside everything unnecessary and keep the essence.
- Redesigning the «See Things Simply?» program, in order to integrate it as a source of feedback and optimization of a permanent nature.
- Training all employees around the Code of Conduct and the capabilities for reporting Unethical Practices.
- Establishing and communicating the 3 lines of defense Risk Management model.
- Completion of certification (CIA, CFE) of the Internal Audit executives.
- Distribution of internal questionnaire for measuring the compliance with the Code of Conduct and its Policies.
- Questionnaire for «Conflict of Interest» executives.

2013

Within the demanding environment of telecommunications industry, we combined our business development with offering to our people development opportunities, eliminating communication barriers, increasing their responsiveness to Corporate Responsibility and the development of team creations, by improving and simplifying our procedures.



Human Resources Development:

- ④ we reviewed the evaluation procedure introducing the new human resources development procedure «Grow@WIND», which fully reflects our new corporate values
- ⑤ we tripled training hours in internal and external programs and designed specialized programs according to the needs of our people.

Improving Procedures:

- ⑤ we simplified more than 130 procedures from April until December 2013 introducing new programs.

Eliminate communication barriers:

- ⑤ we strengthened internal communication at every hierarchical level with the Management Team performing more than 20 meetings in which **88% of our people** participated
- ⑤ we increased the participation percentage to our Employee Opinions Survey by **10%**.

6.

Employees

We preserve and develop a modern, creative and quality environment, of mutual trust and equal development opportunities, with a passion for learning and development, without discrimination and respect for human rights.

6.1

Human Resources Data

Our ongoing goal is to attract, retain and develop professionals who are able to think beyond the usual mindset. Within a dynamic environment of new technologies, extraordinary people who are passionate about learning and development can make their way towards an exciting career. During 2013, we contribute significantly to the Greek economy be employing 1,138 individuals.

Table 1

Distribution of employee/department

Department	Total
General Manager and other Administrative Departments (Quality, Physical Safety, Internal Audit, Legal & Regulatory, Corporate Affairs, Supply Chain & Facilities Management)	73
Human Resources Department	15
Commercial Department	507
Financial Department	93
IT Department	126
Network Department	324
Grand Total	1.138



Table 2

Distribution of employees/department & sex

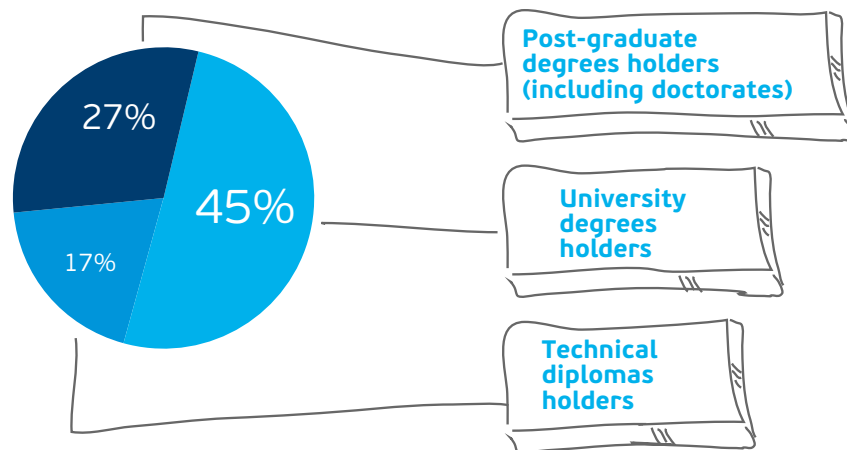
Department	Sex	Number	%
General Manager and other Administrative Departments (Quality, Physical Safety, Internal Audit, Legal & Regulatory, Corporate Affairs, Supply Chain & Facilities Management)	Female	39	54%
	Male	34	46%
Total		73	
Human Resources Department	Female	9	60%
	Male	6	40%
Total		15	
Commercial Department	Female	328	65%
	Male	179	35%
Total		507	
Finacial Department	Female	57	61%
	Male	36	39%
Total		93	
IT Department	Female	26	21%
	Male	100	79%
Total		126	
Network Department	Female	55	17%
	Male	269	83%
Total		324	
Grand Total		1.138	

(Data: 31/12/2013)

Our workforce is characterized
by high academic level and
specialization.

Table 3

Employees academic level



(Data: 31/12/2013)

97,7% of our employees is employed under long-term contracts (of whom 1,35% work part-time). The remaining **2,3%** is employed under fixed term contracts (of whom 34,6% work part-time).

In 2013, we proceeded to **78** new hires, of whom **4** in the outlying regions (Thessaloniki, Ioannina, Patras and Crete). All the needs for new hires and the job descriptions and candidates' profiles for these positions are announced in printed and digital media, and on our webpage (www.wind.gr).

6.2

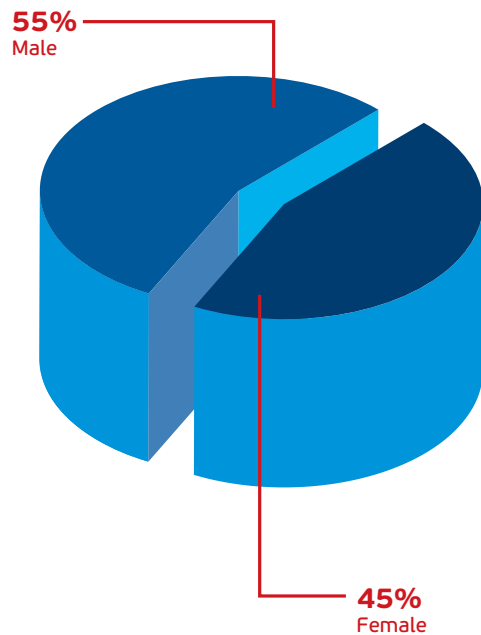
Human Rights & Equal Opportunities

We follow policies of **transparency**, **meritocracy** and **objectivity** for a fair and reliable working environment. Our strategic approach and our philosophy are not restricted to numbers but are based on the principle of **non-discrimination**, **equal opportunity policies** and the recognition of every individual's **right to work**.

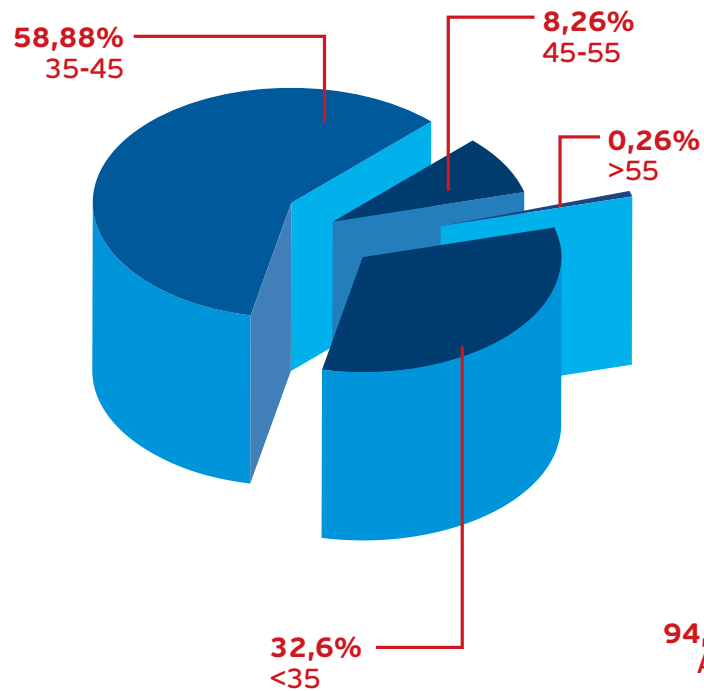
Thus, we offer equal opportunities to all our employees throughout Greece, without gender or other discrimination and from different areas around Greece, cultivating a dignified environment of mutual respect. Due to our equal opportunity policy, **45%** of our employees are female and **55%** are male.

Distribution of Employees per Region, Age Group and Sex

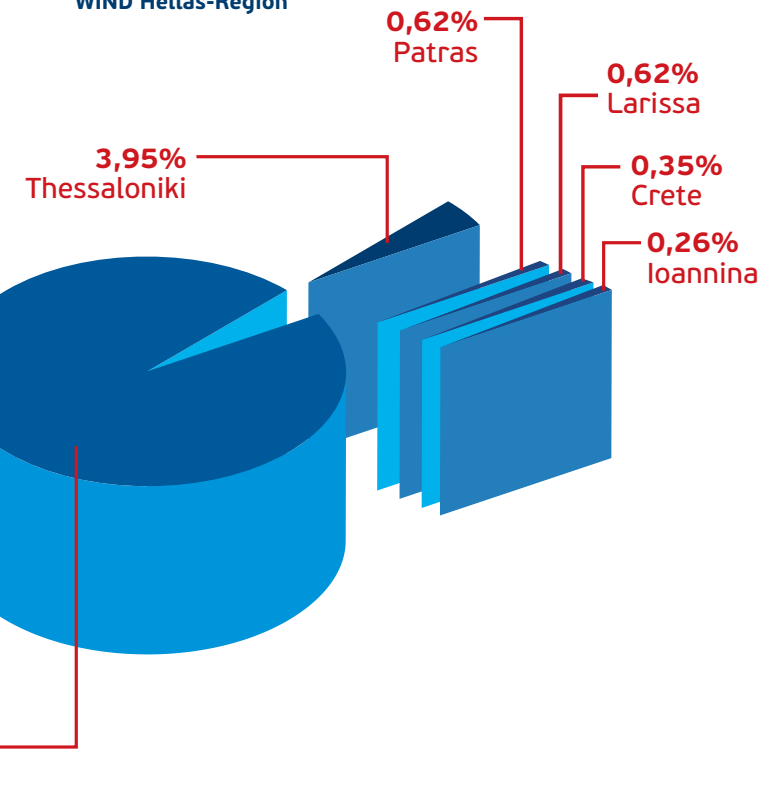
WIND Hellas-Employees' Sex



WIND Hellas-Age Group



WIND Hellas-Region



With regard to human rights, we absolutely respect and we abide by all the international human rights provisions. On the basis of the UN Global Compact, which our Company has signed, we ensure that no minors are hired and that there are no incidences of forced labor in our Company. Since the Company's establishment, no discrimination incident has been reported at any level of our working environment, nor have we received any complaints or accusations regarding a violation of human rights, neither from third parties nor from our employees during the reporting period.

6.3

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 announced being in effect from October 2006. The latest renewal was in September of 2011.

ESSE, among others, provides for:

- ✓ covering child care expenses until primary school
- ✓ providing child allowances, even for the first child, while most existing sectoral labour agreements require payment of a child allowance starting with the third child
- ✓ covering the cost of preventive medical check-ups every two years
- ✓ providing a study allowance also to store sales employees
- ✓ providing standby duty benefit to all employees registered as standby employees
- ✓ granting paid study leave



Working Conditions & Fringe Benefits

We provide our employees **excellent working conditions** and **significant benefits**.

Benefit Package

We have developed a comprehensive competitive benefit package that rewards performance, skill development and overall corporate success:

- ✓ **competitive remuneration packages** – fixed and variable – which are based on comparisons with the market and reward employee contributions to the achievement of corporate goals
- ✓ **group medical coverage plan** with the participation of employees' families
- ✓ **subsidized private pension plans**
- ✓ **preferential use of mobile**, fixed telephony and Internet
- ✓ **restaurant – coffee shop** (on Kifissias and Athinon Sites) with highly preferential prices
- ✓ **discounts on company products** at WIND stores
- ✓ **benefits** under the card reward program for transactions through WIND Bonus AMEX and WIND Bonus VISA
- ✓ **discounts and special offers** in shops and companies throughout Greece

We are trying to secure for all of us more and more competitive prices, discounts and deals on our stores for product categories as well as on products and services of our partners and non-partners in a variety of categories.

Group insurance program:

we constantly re-evaluate the program, in order to offer competitive insurance terms and medical examinations rates. Thus, we managed to reduce the prices by 20% in visits to doctors that are contracted to the network.

In the context of corporate integration of new employees, Human Resources Department conducts an individual detailed presentation of the benefits for each new colleague. Furthermore, when necessary, programmed presentations of the additional benefits are organized per geographical region. Finally, to fully inform employees about the benefit package of the Company, relevant information leaflets and useful information cards are distributed with useful telephone numbers per service, and everyone is updated through a dedicated website.



Workplace Renovation

We moved on structural and functional upgrade of our premises in Athens Avenue, which included:

- 🔧 electromechanical – energy upgrade that improves ventilation, heating and offices lighting
- 🚗 expansion of parking area to 530 posts
- 🚌 provision for shuttle bus service that will serve the transportation from and to «Elaionas» Metro station
- 🌿 creation of a pergola at the restaurant and a new training room

Furthermore, we upgraded hardware and infrastructure with new technologies in our stores, where 750 new desktop computers and **400** new printers were installed.

6.5

Employee Health & Safety

Safeguarding our employees health is our key priority. We follow every safety policy, and we are properly informed on issues related to health and directly affect every employee.

Therefore, for the technicians working close to our base stations, we have obtained personal radiometers-dosimeters, which record the radiation levels in all work areas. All radiometers are collected every year and our radio physicists store their data, so that they can check the level of the recorded electromagnetic radiation. In cases that more frequent use has been made, measurement reports are prepared. The reports has to do with the processing of the electromagnetic radiation levels that the individual radiometers used by each employee have recorded. In all cases, the values recorded were well below the maximum safe exposure limits for occupational exposure.

In a specific area of the technical department of our Company, employees who occasionally and not on a fixed schedule visit Base Stations can find personal protection equipment, which they return after they finish their visit and/or task.

As part of our ongoing effort to achieve high levels of Health & Safety at our Company, we continued this year our collaboration with the External Protection and Prevention Service (GENIKI EX.Y.P.P. PROSTASIA S.A.), which provides us with the high level services of Safety Technicians and Occupational Physicians.

On the basis of the visits carried out by the Safety Technicians, which are conducted continuously on the basis of a specific annual program of visits, significant improvements were made with the goal of complying with Greek and European legislation, as well as generally promoting the health and safety of our employees. Apart from the above, we launched the design, study and gradual implementation of the improvement of our working environment and microclimate. The reshaping of our workspaces and the renovation of our offices exceeds the requirements of legislation regarding area, volume, ventilation and general health and workplace safety specifications.

In 2013, we developed – reviewed the escape plans for all workplaces and posted them where applicable, and we performed programmed evacuation exercises in our facilities at Oraiokastros, Thessaloniki (2-12-13) and Peristeri (4-12-13), in the presence of the managers and the component security technicians of the facilities.

6.5.1

Indices of injuries, professional sicknesses, loss of working days and absences

The following table summarizes the incidents related to health and safety issues in the workplace during the last few years, indicating that no serious incident involving fatalities has taken place.

	Losses in employees	Number of accidents (absence > 1 day)	Number of accidents (absence > 3 day)	Total days of absence from work
2011	0	0	4	38
2012	0	1	1	25
2013	0	0	2	21

Maternity Leave

In 2013, the number of employees entitled to maternity leave was 61 of which 60 used it. All mums who used their maternity leave returned normally to work within the year.



Update on Health and Safety

At WIND, we consider it our duty to provide reliable information on the health and safety issues that directly affect each one of our employees.

Health issues

During 2013, we systematically promoted the concept of preventive care for our employees and their families by offering a number of preventive health examinations throughout the year, either free or at special reduced prices, such as specialized ophthalmological testing, gynecological testing, thyroid screening, preventive cardiology testing, etc.



Working place safety issues

Our Company, depending on the individual educational needs, plan and implement training programs in the field of health and safety regarding issues of:

Fire safety – Fire protection & First Aid

Addressed to colleagues involved in fire teams in our facilities throughout Greece, contain both theoretical and practical part and conducted in cooperation with the Fire Service Department and the doctors of our Company.

Physical Safety

Conducted in collaboration with the Directorate of State Security, consisting of theoretical and practical part and are addressed to our fellow employees of security groups in our facilities throughout Greece.

In 2013, these types of training were not performed.

Socially Responsible Employer

We constantly follow the developments in indicative issues such as public health, labor laws and tax income, and have integrated in our corporate communication plan the implementation of immediate and timely update of all our employees on every matter that concerns them.



Employees Growth & Development

Our human resources management connected with the concepts of continuous training, encouragement and support of initiatives in order to support every employee's development. Our people know that we invest in them by ensuring the proper growth conditions, both on a personal and a professional level by mapping their Annual Education and Development Plan.



Training

Our key priority is the continuous training of our employees so that they can grow while improving their performance through equal training opportunities that support employees' career progress and generate a competitive edge for our Company in relation to the competition. Training is provided on technical and managerial skills so that employees are fully trained in their area of expertise. In 2013, **16.502 hours of training** were provided.



	Category	Hours of Training	Percentage	Average Hours training/ employee
2011	Upper level executives	224	5,21%	6,65
	Mid-level executives	533	5,89%	
	Technical Personnel	4608	51,69%	
	Sales & Customer Service	3032	34,01%	
	Remaining Personnel	517	5,80%	
	TOTAL	8.914	100%	
2012	Upper level executives	380	7%	5,02
	Mid-level executives	326	6%	
	Technical Personnel	688	12%	
	Sales & Customer Service	4102	71%	
	Remaining Personnel	251	4%	
	TOTAL	5.747	100%	
2013	Upper level executives	752,8	4,6%	14,48
	Mid-level executives	4.231,6	25,6%	
	Technical Personnel	3.721	22,5%	
	Sales & Customer Service	5.782	35%	
	Remaining Personnel	2.014,6	12,2%	
	TOTAL	16.502	100%	

Categories of training

Diagnostic Development Tool - "Growth Factor Inventory"

Our will for teams development and team results led to a modern diagnostic tool for a 360-degrees feedback. The objective of the program is to identify the strengths and the areas that need to be developed of our administrative and leadership skills in order to maximize our potentials for the development of our teams. 184 executives participated and the results were utilized in implementing the **Leadership Campus** program.

Leadership Campus is a vertebrate and challenging educational program tailored to the characteristics and requirements of the wider group of our executives. It is based on the most modern experiential development methods through multi-thematic and interactive workshops, team coaching sessions and participation in informative workshops. In 2013, 60% participated recording a total of **3.120 hours** of development.



«Being Developed-Mentoring Youth» program

We take the initiative to exploit Corporate Social Responsibility actions in order to develop our executives, encouraging them to voluntarily participate in young people mentoring programs that give our people the opportunity to develop their leadership skills and to have a different development experience.

The objectives of this program are:

- ✦ Developing our executives skills in guiding and mentoring
- ✦ Attracting talented candidates
- ✦ Strengthening CSR in the new generation and promoting WIND through social networks.

In this context, in 2013, our executives participated in the following programs:

"Future Leaders": non-profit organization, which operates in the field of Education and Social Contribution. Through the organization of interactive educational programs for postgraduate students or postgraduate programs alumni and corporate executives, aims to connect educational institutions and labor market. Corporate executives attend a 4-day workshop on mentoring and then instruct graduate students in the implementation of projects they undertake for the support of NGOs. In 2013, **3 executives** from the Human Resources Department and the Customer Service Department participated.



it is an organized effort by a group of people from different backgrounds to create opportunities in the modern business environment by bringing together people looking for a job in the professional field of their choice. WIND was the first who supported this voluntary initiative establishing in 2013 a unique partnership for the creation of opportunities for new candidates entering labor market, with our executives who voluntarily participate in the program and act as mentors for graduates. The launch of the program is scheduled in early 2014.



Executives Inspiration Program

This program gives our employees the opportunity to attend lectures and presentations by internationally recognized persons from the fields of management, leadership and entrepreneurship. The program aims to inspire executives who participate to:

- seek and find meaning and significance in their role as leaders
- commit to realizing their full potential
- unleash the unique power of their group.

Since its launch in September 2013, the following actions took place:

- **Sept 13:** organization of a workshop with speaker the Greek origin Teo Vasilakis, founder and CEO of Metanautix, a powerful startup in the area of **Big Data Analytics**, who mentioned important projects such as Data and Tenzing, as well as the development of billing and financial/sales reporting systems and the development of the language and acoustic models for speech recognition. About 60 executives from all parts of the Company attended the speech.
- **Oct 13:** we had the opportunity to welcome the world famous «guru» on coaching, **Hedre Coetzee**, founder of the Center of Advanced Coaching, aiming to inspire our people in issues of **leadership and management of group of people** in difficult times. About 120 persons from all parts of the company attended the speech.

Winning Team Lab

For the first time in 2013, the **Winning Team Lab** was designed, a specialized initiative for the development of cross-functional teams in our Company, as well as a unique evolutionary experience for everyone, with the following objectives:

- 🔗 to illustrate the characteristics of effective cross-functional project teams
- 👥 to facilitate the members of the groups, through interaction, to fortify their existing strengths and develop the skills that maximize the effectiveness of their team
- 🎯 to develop and reinforce, both at individual and team level, the abilities and skills that affect directly the fulfilment of excellent corporate results.

In November 2013, the **first 2 Winning Team Labs** were implemented, with the support of external consultants, with priority to those teams that had important corporate goals.

Internal Training Programs

We, the people of WIND, organized various internal trainings diffusing knowledge to our colleagues. The trainings included, among other subjects, Information Security Awareness, SAP, DSL Network overview and Project Management.

Scholarships

A program to finance bachelor's and masters studies aiming at earning valid qualifications for those employees who have high career growth potential in the Company. Since 2002, the Human Resources Department has granted a total of 43 scholarships for Undergraduate and Postgraduate Studies in public and private academic institutions, of which 31 were for postgraduate degrees and 12 for undergraduate degrees.

Library

We established a library at our Company's central office where more than 1,000 books and professional articles on various categories are available to all employees, aiming at knowledge dissemination in various fields, according to their area of expertise.

Talent Management & Succession Planning

The in time forecast of future needs of the Company with the emergence of talented executives, and the identification and development of individual talents, are of high importance. Showcasing the talents of our people reflected on a process that establishes a common language and personal development, which is used at all levels of the organization.



6.6.2

Professional development

As our main goal is to provide career opportunities for our employees, we give our employees the opportunity to work closely with their supervisors in every department of our Company with a view to furthering their development, establishing the framework that integrates their individual abilities and aspirations into the skills required by the Company. We invest in our people and in their development, using the latest tools available for their development:

Corporate Induction Programs

We implement corporate induction programs for all new hires in all divisions and departments, during which they are given the appropriate guidance regarding what the employees need to know about the Company and the telecommunications market.

Since the end of 2013, we are in a process of updating the organization framework of the program, which is expected to be completed in the second half of 2014.

Internal Candidate Recruitment

When there is a need to fill an open post, we firstly look among our own people, as the best source of qualified candidates. Thus, our employees are encouraged to explore opportunities for a change and growth in other posts or departments in order to give them the chance to acquire knowledge, personal growth and freedom of choice. At WIND Hellas, all employees can evolve into “knowledge leaders” or “people leaders”.

In 2013, 7% of our people participated in staffing positions selection procedures and 68% of them were promoted or moved into new roles.

Performance Development Systems

All of us at WIND we are proud that the value of high performance and continuous improvement is the primary component of our culture. In February 2013, due to the need of change (a finding of the Employees Opinion Survey), the performance evaluation procedure was one of the tools that we reviewed and improved, in order to strengthen this culture. Thus, we created the new **Human Resources Development Procedure, «Grow@WIND»**. For the current year, we adopted a transitional process that focuses on direct personal meetings between superiors and subordinates in order to highlight the development needs.

The central axis of this new procedure is the alignment of our people with the corporate strategy, the objectives and values of WIND with specific abilities and skills we seek to develop, improving our performance. The process is multidimensional and is based on every source that can lead our employees to add more value through their work.

Upon completion of the planing, we organized **educational meetings** with our people in roles with teams management and update presentations to all our people.



Personal Development Plan

The growth of WIND focuses on essence and includes value added features for the people, the teams and the organization. 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 supervisors and is based on the development experiences that are necessary for the achievement of the common goals.



Βάση μας η ομάδα.
Στόχος μας η κορυφή.

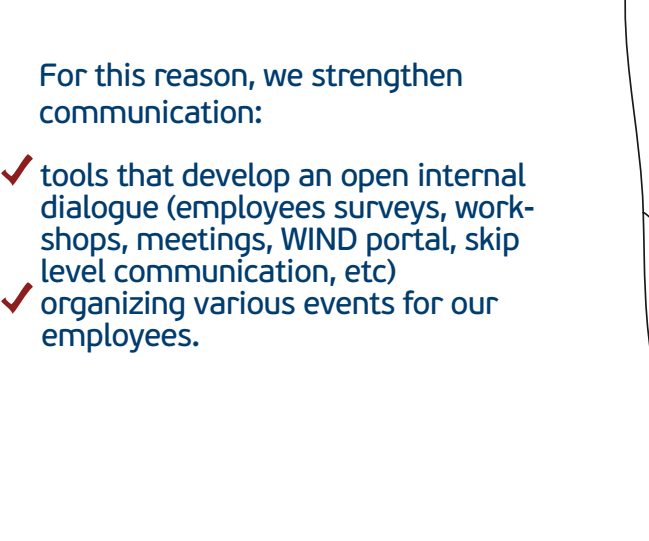
ΕΓΧΕΙΡΙΔΙΟ
ΔΙΑΔΙΚΑΣΙΑΣ ΑΝΑΠΤΥΞΗΣ
ΑΝΘΡΩΠΙΝΟΥ ΔΥΝΑΜΙΚΟΥ

6.7

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At WIND Hellas, our working environment is characterized by mutual respect and trust. Sincerity and responsibility for our customers and colleagues is an integral part of the employees' professional conduct, whilst we operate with transparency and reliability in all our daily transactions inside and outside the Company. A prerequisite for all the above is the development of a proper communication policy parallel to a system of continuous "coaching" for a successful human resources management.

We believe that deepening internal communication at all levels is one of the fundamental factors that determine our success and which strengthens the climate of trust and contributes to the establishment of a single culture that acknowledges individual capability, effort and contribution, while further enhancing team work.



A hand-drawn illustration of a notepad with a pencil. The notepad is white with a black border and a vertical line on the right side. A pencil is drawn at the bottom right corner. The text on the notepad is as follows:

For this reason, we strengthen communication:

- ✓ tools that develop an open internal dialogue (employees surveys, workshops, meetings, WIND portal, skip level communication, etc)
- ✓ organizing various events for our employees.

- ✓ tools that develop an open internal dialogue (employees surveys, workshops, meetings, WIND portal, skip level communication, etc)
- ✓ organizing various events for our employees.

[illegible][illegible]

WIND news

DIAGNOSTIC ELETTRICO ELETTRONICO

LEADER	1	100%
PERFEZIONISTA	2	90%
WIND CYCLING	3	80%
ARMAMENTI TACITURNI	4	70%
CI AFFRONTO TUO...MI	4	70%

OLYMPUS MARATHON

Da 20 dicembre 2013 per chi ha fatto maratona questo appuntamento sarà un'occasione per sfidare se stessi. Insieme a 1.500 concorrenti, Olympus Maratona 2013, si correrà la maratona più impegnativa e impegnativa del mondo. La maratona più impegnativa e impegnativa del mondo. La maratona più impegnativa e impegnativa del mondo.

Non è facile correre una maratona. Ma se si ha la forza di volontà e la forza di volontà, si può correre una maratona. Ma se si ha la forza di volontà e la forza di volontà, si può correre una maratona. Ma se si ha la forza di volontà e la forza di volontà, si può correre una maratona.

La maratona più impegnativa e impegnativa del mondo. La maratona più impegnativa e impegnativa del mondo. La maratona più impegnativa e impegnativa del mondo.

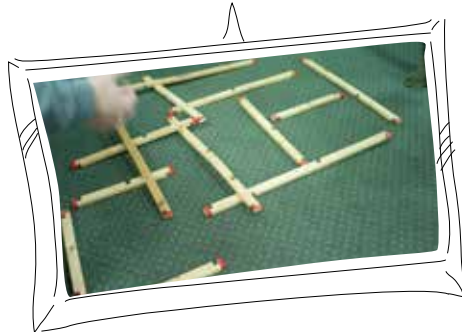
6.7.1

Dialogue Development

New Corporate Culture

In early 2013, the new corporate objectives were announced, which lead to the development of the new corporate vision and the Values of our company. The new corporate vision was formed with the participation of all of us, by the submission of ideas from people and our partners and then with the assistance of the Management Team in order to establish it in a concrete and comprehensive way. The actions that were taken towards this direction were two specialized workshops of the Management Team and our Executives. Apart from the work that was made, the meetings functioned mainly as an opportunity for essential acquaintance, views exchange and development of closer and more effective relationships between our people and our departments.

The Management Team processed and agreed on WIND's Mission, the characteristics of the Corporate Culture that will contribute to the implementation of our new Mission. The result obtained by the Team of Executives is the identification of **WIND Behavior Model**. This model was worked and formatted by the employees themselves in special workshops where involved 10% of our employees and, from now on, is the base on which every human resources management system is developed, ensuring the alignment of the organization with the corporate objectives.



Open Communication Meetings

At WIND we have the opportunity to communicate with structure and openly with the members of the Management Team – on every Department's meetings level – and throughout the year. This way, we aim to discuss directly issues that concern us, as well as to highlight recommendations for improvement of our everyday life, succeeding in 2013 to hold a total of **22** meetings across the organization with the participation of **88%** of our workforce.



WIND Intranet

In our internal portal, we created a special place where we can find directly information about the organization, the internal job announcements, promotion and movement announcements and to meet our new colleagues.

WIND EcoNews, one of the core sections of WIND Portal aiming to constantly enlighten everyone about the protection of the environment. The first issue of WIND Eco News for 2013, was dedicated to World Wetlands Day, and the alternative «green» and economic heating methods. For 2013, in the context of the above, we offered our lucky fellows:

- 📍 A 5-days trip for two at Kerkini lake
- 📺 A 12.000 btu Inverter airconditioner



**We communicate.
We become better.**

Employees' opinion survey

Employees opinion survey

For the second year, we conducted the Employees Opinion Survey with extremely high participation of 82%. 82% of participants said that the company demonstrates social responsibility, while it was increased by 17% the percentage of employees who believe that the company expresses great interest and care for its people. The aim was to express our opinion about our work environment, to highlight the strengths of our Company, as well as the points that need to be improved, focusing on specific action plans. The results of the Survey and the more specific and less positive responses are posted on the internal portal of WIND.

During March and April, meetings of the departments were held in order to discuss the results of the Employees Opinion Survey of 2012, which resulted in action plans for each department, which lead to the design and implementation of various projects, so that we all have our opinion and we all participate in the common goal. For example, some projects that arose concern the simplification of the procedures and the reduction of approval levels, customer focus, review of the assessment process, benefits enrichment, open communication meetings, etc.

Results from the employees' survey

It is worth noting that 82% of participants said that the company demonstrates social responsibility, while it was increased by 17% the percentage of employees who believe that the company expresses great interest and care for its people.

In addition, in 2013, the first Employee Survey in the franchise branch network of WIND was implemented. The survey was anonymous and was exclusively addressed to salespeople of WIND stores. The aim was to highlight the concerns of the employees and to improve their everyday life. The survey results were evaluated immediately and action plans for every individual field that needed improvement were created. The projects that have been already implemented have as top priority to improve the employees every day work life in our stores and our customers experience in them.

The survey showed that 94% feel satisfied when they serve the customers of the store efficiently and the average score they give to teamwork-cooperation within the store is 85%.



6.7.2

Employees events

Our constant objective is to support those methods that further strengthen the development of relationships among our employees in the corporate environment by organizing various events throughout the year.

Parent's Day

We promote the concept of balance between professional and personal life.

Environment Day-Painting Competition

WIND offered the materials and children put their talent to paint whatever fits their imagination in relation to the Environment.

Christmas Celebrations for our Children

This year, for the first time and especially for Christmas, we organized celebrations simultaneously in Athens and Thessaloniki for our children.

International Woman's Day

We offered **FREE Pap** tests for every woman colleague and our fellow's wives.

6.8

Internal Volunteerism

Based on the belief that the knowledge and the motivation for awareness should start from the internal environment, we proceeded to the systematic development of corporate volunteerism, aiming to be informed and actively participate voluntary in the social program of our Company, conveying at the same time the message and the value of social contribution.



Social contribution

In order to strengthen the work of Organizations that support vulnerable social groups, we participated as employees in even more actions of social responsibility – enhancement of actions for the family and the environment, participation in the national program of support of unemployed, etc., while we increased our participation at WIND Running Team by 25%.

Christmas Donation of Love

In December 2013, we held a Christmas donation of love, addressed to children hosted and supported by the «Sikiaridio» Foundation. Totally, from our employees donations more than **40** boxes with relief items of food and items to prepare sweets for the children Christmas bazaar were collected, which were delivered in person by representatives of our employees.



Employee Blood Bank



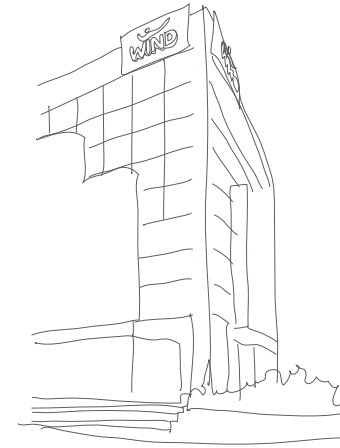
WIND Blood Bank operates since 2002 thanks to our employee voluntary blood donation program, which now takes place twice per year. The aim of the Blood Bank is to contribute to the national effort to obtain adequate blood supplies and to immediately support employees and their families should they require blood. For the implementation of the program, we collaborate with major hospitals. Since 2002, the Blood Bank has received a total of **806** voluntary participations.

In 2013, we held two Blood Donation programs both in Athens, with the participation of more than **92** volunteers who donated a total of **87** units of blood, and in other cities outside Athens for colleagues who wished to participate. The motto “**WIND Health for All**” strengthened the team of voluntary blood donors who offered this precious good of all. In 2013, the Blood Bank met the needs of **37** of our people (colleagues and their relatives) by providing **49** units of blood.



Objectives 2014

- ✓ The development of a new Human Resources Management On-line platform
- ✓ The Strengthening of actions of talent management through new tools and practices
- ✓ The support of **corporate culture** integrating "challenger" and its values to human resource management in our professional everyday life
- ✓ The further strengthening of personal development plans through the **Grow @ WIND**
- ✓ The update and improvement of the **internal WIND portal**
- ✓ **The design** of practices that strengthen the concept of "WIND Friends & Family"
- ✓ **Further strengthening the concept of internal volunteerism**
- ✓ **Strengthening and maintaining internal open communication** between all the hierarchical levels within the Company
- ✓ The change in configuration the workplace to enhance cooperation and communication- "Open Plan"
- ✓ **Continuous update on Health and Prevention matters** and promotion of activities that prevent health issues for our employees and their families.
- ✓ **Further improvement of the Health and Safety conditions of our employees with:**
 - ➊ measurements of natural factors (e.g. microclimate analysis)
 - ➋ chemical and biological water analysis
 - ➌ organization and implementation of H & S training programs (First Aid – Fire protection)
 - ➍ evacuation exercises
 - ➎ drawing an H & S management system project
 - ➏ training of facility security officers



WIND Stores 2014

- ✓ Care for the offerings available to employees of WIND Stores
- ✓ **Design of training and continuous skill development tools** for employees at WIND stores
- ✓ Development of an open communication portal among the employees of WIND stores and also between the employees at WIND stores and all hierarchical levels in the Company
- ✓ Participation of employees at WIND stores in corporate sports activities aiming to promote team spirit and volunteerism

7.

Society

We contribute systematically to improving the quality of life of the communities in which we operate, by offering intact services to meet everyone's communication needs and ensure their access to the Society of Technology.

2013

Being consistent to our commitment to a better society and recognizing the important role that our industry plays in the life of modern people, we continue to offer affordable and technologically advanced services to All. For one more year, we took seriously under consideration the needs of society and integrated them into our operations. We supported innovative ideas promoting volunteerism, social solidarity, sports, education, environmental awareness and culture.



- We supported 8 NGO's all over Greece
- We supported the race program Run Greece
- We developed a collaboration with the initiative Saferinternet.gr, in the context of the program kids@safety: Internet, mobile phone and child
- We distributed free books on Culture in 160 regional public libraries
- We supported the cleaning program of Thermaikos Gulf

7.1

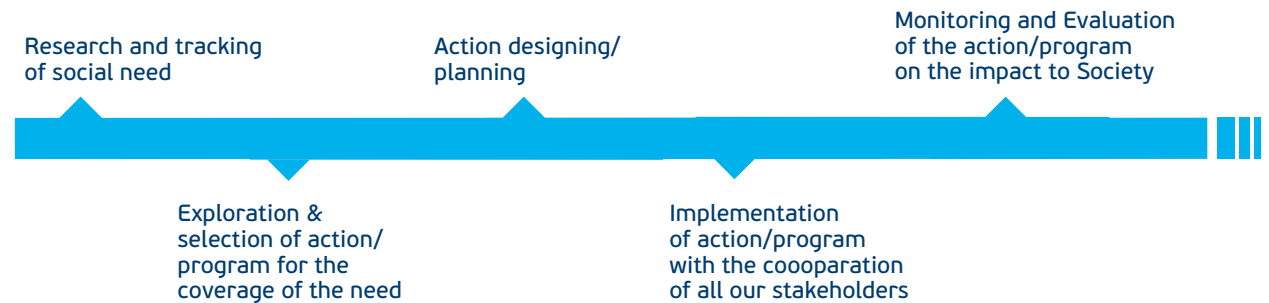
We contribute to Society

We operate responsibly towards Society offering financial support to actions or bodies and creating those circumstances that could lead to the active involvement of more and more people in achieving a goal, advocating social solidarity and participation.

In 2013, we worked in accordance with our reviewed strategy upon a specific actions plan that is developed around three axis:

Participation  Awareness  Contribution

Programs Management Plan



7.2

Participation



<https://www.youtube.com/watch?v=Azw7v1-l4eU>

Running Movement – A race for all

- ✓ **49.667** Runners
- ✓ **2.600** WIND Running Team Runners
- ✓ **23** Celebrities
- ✓ **116.000€** to 8 NGOs all over Greece



For one more year, in order to link sports with social solidarity, we gave everyone the opportunity to participate and run in the colors of WIND Running Team for a good cause!

This year, the participation in the run races of the 8th International Marathon «Alexander the Great» exceeded all previous organizations of Marathons «Alexander the Great». More than 10.000 runners, adults and children, participated in the event and passed under WIND Arch of Love. Through the participation of 1000 runners of WIND Running Team, 8 celebrities, the Arch of Love and the application «A race for all» in the official page of the Company on facebook, we collected 30.000€ in order to support the Girls Orphanage Melissa. For one more year, WIND creates a strong social footprint and support, while the increase of participations is worth noted since it reached nearly 50% compared to 2012, confirming the acceptance of the institution by the public and making the race an important social and cultural event for the city of Thessaloniki.



Accordingly, in the context of the 31st Athens Classic Marathon in November 2013, we supported the work of ELEPAP and FLOGA with the participation of 31.000 runners in total. Before and after the race, we activated a series of «mechanisms» for the support of the two institutions. With the participations of WIND Running Team, 15 celebrities, the Arch of Love and the user of #WINDRun4All in posts, tweets and photos, we collected a total of 60.000€. The increased participation of the public is typical:

✓ Record of participation for runners. This is an increase of 19% compared to the previous year. Even more impressive is the increase of participations by 67% in comparison to the first year that WIND undertook the support of the Games.

✓ Record of participations for WIND Running Team, with an increase of 60% compared to 2011 when the team was established.

Finally, WIND, aiming to bring people of all ages close to sports and promote social solidarity, participated as Lead Sponsor for the 5 and 10 km Run Races, of the Run Greece program, organized by SEGAS.



Run Greece

In 2013, for the first time, WIND decides to support sports in the region by creating Run Greece, an institution of city road games. The objective of this initiative is to give extra boost to local communities and bring even more people closer to sports.

In 2013, the program included 5 cities: Heraklion, Ioannina, Kastoria, Larissa and Patra, in the context of which, WIND supported 5 local bodies of social solidarity, one for each city, offering 3€ for every runner who participated.

Beyond charity, the social dimension of the local support actions is particularly important. In order to give life in local communities of the region, we created events before and during the Games. More specifically, we created special promotional running teams that promoted the sports spirit in the city a few days before the Race. At the same time, in the center of each city we put a structure that informed about the forthcoming Games.

For the day of the Games a special Arch was built, which was carried in every city, urging runners to pass under it and enhance the amount offered by WIND to each institution. Finally, for each city, a specially designed communication plan was designed that carried the main message of this social action: «**A Race for All**».



Contribution

Klimaka: 10520 Information Line on Homelessness

In 2013, we continued supporting our homeless fellow citizens, providing the 5-digits number 10520 to the Non-Profit Organization KLIMAKA, in order for the homeless population in Greece to be recorded, and for the homeless people to be immediately informed for services offered free of charge (food, housing, medical care, etc). Finally, anyone who traces homeless people or people at risk of losing their shelter can call the 5-digit number so that the loss is prevented.

Sikiaridio Foundation

Just before the end of 2013, WIND employees responded to the initiative of the Company and implemented the established Christmas donation of love which was this year dedicated to the children and young people with special abilities that are hosted at Sikiaridio Foundation.

The great response resulted to the raise of tens of boxes with relief items for children. The donation was delivered by our employees representatives, and was received with great joy by the children and staff of the Open Care Center of Sikiaridio Foundation.

Thermaikos Gulf

In March 2013, we participated in the waste and pollution load management program of Thermaiko Gulf, of the Ministry of Macedonia and Thrace. The aim of the program was the cleaning of Thermaikos Gulf surface from floating waste and possible oil spills, on a daily basis. WIND immediately responded to the call of the Ministry so that the entire axis of Thermaikos Gulf remains clean in 2013, focusing on the waterfront of the city of Thessaloniki.

Book Bazaar

4th charity book bazaar and music festival BHMA FM 99,5

During the Bazaar 200.000 books were given for 1€ each. The total amount of the money was offered to the Welcome and Solidarity Center of Athens Municipality for the supply of food and relief items for our fellowmen.

Animal Action

We support the effort of taking care «homeless» animals in cooperation with “Animal Action”.

Greek Rescue Team

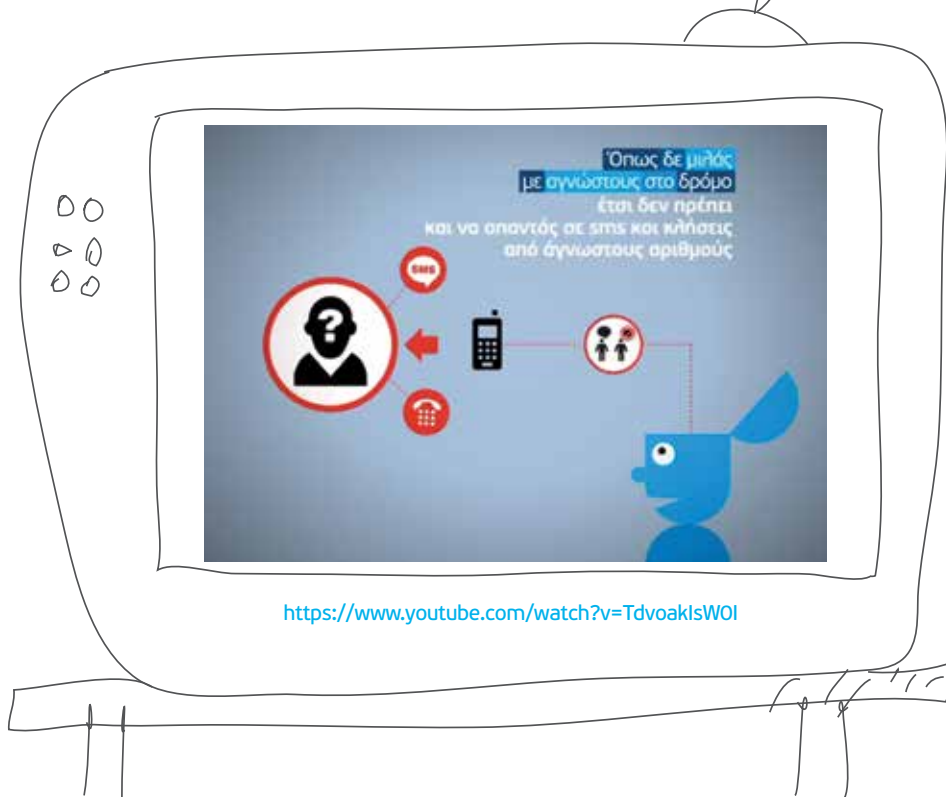
We cover the telecommunication needs of Attica GST .



7.4

Awareness

**Kids@safety internet, mobile phone
and child (Your mind... on the web)**



- ✓ Digital information platform www.kidsatsafety.gr
- ✓ Collaboration with the Greek Center for Safer Internet and the platform www.saferinternet.gr
- ✓ Support the platform www.cyberkid.gov.gr through our collaboration with Cyber Crime Unit



**CYBER
CRIME
UNIT**





Safe use of new technologies is one of the main issues that concern parents and children. WIND, recognizing the need to inform parents and children about the safe use of Internet, we continued **the Kids@safety Internet, mobile phone and child** campaign all over Greece. In our official website, we provide analytical advice and audiovisual material to parents, children and teachers, and we publish surveys on the use of new technologies by parents and children. In this context, this year we supported again the nationwide survey held by **N.E.O.I.** NGO that aimed to highlight the attitudes and behavior of young people regarding the use of Internet and

we presented the results of the online quiz **«What kind of parent are you?»**, which «run» during 2012 through www.kidsatsafety.gr, regarding the attitude of parents towards the use of Internet by their children. In addition, in 2013, we launched our collaboration with the Greek Center for Safer Internet and the action SaferInternet.gr (www.saferinternet.gr), which is under the auspices of the European Commission, while we supported for the second year the online interactive application www.cyperkid.gov.gr with useful advice about the safer use of internet, an initiative implemented by the Cyber Crime Unit.

TED^xAcademy

x = independently organized TED event

In September 2013, we participated in **4th TEDxAcademy**, held at Athens Music Hall, with main topic **“I discover”**.

1.500 had the opportunity to participate and listen guest speakers, personalities with strong social action – from the world of science, technology, art and business – from Greece and around the world, while 2.300.000 people watched them through live streaming.

Η δύναμη του **plus** / The power of **plus**⁺

TED^xThessaloniki2013

x = independently organized TED event

TEDx Thessaloniki

With great pleasure, we participated, as a telecommunications provider, at the **4th TEDx Thessaloniki** with main topic **«the power of +plus»**. Through our network, we offered unlimited free wireless Internet to the TEDxSters, for those who wanted to blog, to share their experience and transfer the climate directly from the heart of TEDxThessaloniki.

It was a full day of inspiration, entertainment, knowledge, networking, focused on the need to draw attention to concepts, facts and activities with positive sign, positive thinking and action. The speakers, coming from different places, conveyed ideas about how the power of **«plus»** can become a reality.





Objectives 2014

- ✓ To develop new tools and applications for parents and children on the webpage cyberkid.gov.gr
- ✓ To increase the number of information workshops for the safer use of Mobile Phone and Internet across Greece
- ✓ To increase the number of the NGOs we support through WIND Running Team
- ✓ To inform and awake the public about the protection of stray animals.



8.

MARKET

We offer responsible products and quality services, investing in innovation and development, in order to meet the communication needs throughout the Greek territory.



2013

Trying to meet the telecommunication needs of all the Greek territory, we designed integrated products and services, we expanded and upgraded our telecommunications network, we developed our sales network and safeguarded a quality level of service and absolute satisfaction and protection of our customers' personal data in every possible way.



- ✓ We simplified our commercial portfolio of fixed telephony and Internet launching 5 new commercial programs that replaced the previous 10
- ✓ We carried out an expansion in 5 telecom nodes, reaching a total of 276, providing fixed telephony and Internet services to about 70% of the installed telephone lines
- ✓ We expanded VDSL technology from 33 to 162 Urban Centers and noted an increase in total coverage of VDSL by 158% and more than doubled the relative base
- ✓ We focused on our online presence, on a deals level, messaging, layout and functionality of our site and our online shop
- ✓ We continued to redesign our processes to serve our customers through our stores and call center
- ✓ We simplified our procedures and redesigned the Corporate Customer Service Department, for their optimum service
- ✓ We contributed to the strengthening of the green economy through innovative services, WIND Fleet and WIND Cloud.

8.1

Our Telecom Network

For 21 years, we invest intensively in infrastructure and development of our network with responsibility and sensitivity to public health and the environment. During installation, operation and control of the operation of our network, we adhere to all the international security standards as well as the directives of Greek Legislation.



More specifically,

- ✓ we adhere to the most stringent exposure limits set by the law as well as from relevant international organizations
- ✓ we collaborate with the local bodies, when constructing new base stations.

The aim of our strategy, with our investments to the new network and our trade promotions, is to bring mobile broadband closer to Greek users.

At the end of 2013, the population coverage of the **mobile telephony network** was close to 100%. Two years ago, we started the project for the complete modernization of our network, one of the largest infrastructure projects in the country. It has to do with the creation of an entirely new radio network that allows nominal mobile broadband speeds up to 42 Mbps. Upon completion of the modernization, WIND network will be one of the top networks in Europe and the customers of the company will enjoy a very fast network.

In 2013, we have completed the modernization of the stations that cover areas of Northern Crete, Chalkidiki, Ioannina and Xanthi and we continue to other major cities, as well as to targeted areas.

In 2013, WIND entered 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 the densely populated urban areas.

Fixed Telecom Network

Coverage for **fixed telephony** services and broadband Internet is at about 70% of the installed telephone lines in Greece. During 2013, 5 telecommunications nodes were expanded and the connection circuits at about 60 sites were upgraded through backhauling.

Development of Fixed Telecom Networks	
International Capacity	60 Gbps
GR-IX	20 Gbps
Collocations in Telecommunication Hubs	276
Underwater Fiber Optic Cables between	Greece - Italy Crete - Peloponnese Peloponnese – Central Greece



Electromagnetic Radiation

At WIND we adopt policies regarding the monitoring and measurement of electromagnetic radiation levels, while we have installed mechanisms of error prevention and improvement of the provided testing and measurement services.

We adhere consistently to all our obligations on legal and regulatory issues of telecom services, and we safeguard the impartiality of the measurements made by the Health & Environmental Issues Department. In addition, we educate our employees on quality management issues and measurement methods, we inform our customers and all our stakeholders by providing reliable information.

We have the High Frequency Electromagnetic Fields Measurement Lab, which performs systematic measurements on base stations to ensure strict compliance with all the international safety standards and the directives of Greek legislation. In June 2012, the laboratory was accredited by ESYD according to ISO 17025.

In 2013, we performed 25 measurements either in the context of base stations licensing or at the request of citizens.

In addition, we systematically inform our subscribers through specialized brochures, through www.wind.gr or through articles and media interviews.

Finally, we make sure that all our mobile telephony devices strictly adhere to the requirements for safe radiation exposure (as defined by the International Commission on Non-Ionizing Radiation Protection and the Federal Communications Commission) and actual SAR levels are much lower than the permissible limits.

8.3

Communication for All

At WIND, we offer mobile telephony, fixed telephony and Internet services. Our goal for 2013 was to simplify our programs and services even more, offering more simple, understandable and affordable corporate proposals.

8.3.1

W Contract Plan

We launched **W**, a contract plan that responds to the needs of the market, for products and services that are characterized by the optimum value/price relationship and serve in the most simple, direct and understandable way the commitment of WIND: “Economy for all”. With **W** we emphasized our differentiation from the competition, offering a new contract plan that contains free communication for all, not only to the same network, we strengthened and repositioned the already successful communication “for all”.

For subscribers that want to communicate more and cheaper from and to foreign countries, we offered in 2013 two new services, **International Talk and International Talk & Roam**, with free airtime to the most popular international destinations outside Greece, and even lower rates when traveling to countries of the European Union.

8.3.2

Prepaid telephony

As far as prepaid telephony is concerned, in 2013, we responded immediately to the social and economic conditions of the time, offering to our consumers' communication without commitments, with transparent charges and unambiguous terms of use through the WIND F2G and Q brands.

In addition, we continue to offer competitive motives for airtime recharge through our stores, offering free Bonus time, Smartphone offers and prepaid package activations through special competitions.

More about WIND products and services: www.wind.gr



8.4

Responsible Services

8.4.1

Information Services about Mobile Telephony



✓ **Contracts Balance Update Service**

Every mobile telephony contract subscriber can be informed about his or her airtime or SMS, at any time instantly and free, by sending a blank SMS to 1212.

✓ **WIND to All programs Balance Update Service**

WIND to ALL subscribers can be informed about their airtime, SMS & MBs of their program or their additional bundle, as well for the Account Limit they have initially defined, simply by making a call to 1270 from their mobile.

✓ **WIND to All Programs Free Automatic Update Service**

In addition, at WIND to ALL programs, subscribers always know what happens to their account, because they are updated automatically and free of charge with SMS, 10 minutes, 10 SMS & 10 MB before, as well after the free usage of their program is exhausted.



Minors protection

As far as multimedia information services are concerned we adhere strictly to regulations for the protection of minors when using the mobile phone. Regarding the 901 and 909 lines we have, as well as the five-digits SMS, the owner of the account (adult) can request with a phone call or written communication to be blocked. This barrier capability also exists for WIND Plus (wap portal) through the **adult verification mechanism**, in which the user has to verify that he is an adult in order to proceed with the use of the adult content.

Table 1

Customer Service

Call Number	Mobile Service (Individuals)
1270	Balance Update Service for W and WIND to ALL programs
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 Phonebook Service

Call Number	Fixed Telephony Service
13800	Fixed Telephony and Internet Customer Service
1212	Technical Support and Fixed Telephony & Internet break-down from within WIND network (free of charge)
211 120 1212	Technical Support and Fixed Telephony & Internet break-down from another network (with charge)

Call Number	Mobile and Fixed Telephony Services (Professionals)
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

8.4.2

Prepaid Telephony



Balance Update Service

Every prepaid telephony subscriber can be informed instantly, automatically and free of charge. Consumers can be informed about their airtime balance, their balance after having consumed the free airtime package/es of their program, as well as their loyalty bonus



Airtime Extension Service

Subscribers have the possibility, even if they have a zero balance, to extend their airtime balance, simply by calling a 4-digit number in order to speak instantly at a difficult time.



WIND Ring Me Now Service

This service allows subscribers to send an immediate alert to any WIND customer, either prepaid or contract, requesting a callback when their balance is not sufficient. Sending an SMS to 54040, writing only the number of the mobile phone that is going to make the call activates this service.



Prepaid Bundle Change Service

This service enables subscribers to select the prepaid tariff plan according to which they will be charged. Calling 1342 can perform the tariff plan change and the change is activated immediately. Requests for plan changes may be made once per month.

8.4.3

Informing the Public



Parental Control

We systematically inform parents about the ability to restrict access to minor users, through print and electronic media, as well as by organizing workshops throughout Greece.



Transparency in Billing

We make sure that at every point of customer information billing information are provided in a transparent, detailed and clear manner, and that it is explained simply and accurately through updated price lists, press releases or through personal communication. Regarding multimedia information services and calls charged at higher rates, we provide detailed information to our subscribers concerning these charges, fully implementing the regulations of the Hellenic Telecommunications and Post Commission (EETT), clearly announcing the charge for the call with a free pre-recorded message. The charges for all multimedia information services for each product can be found on the Company's website (www.wind.gr)

8.5

Responsible Products

The products we receive and offer for sale through our network of associates are covered by European legislation (the "CE mark"), (http://ec.europa.eu/enterprise/policies/single-market-goods/cemarking/faq/index_en.htm), as harmonized with Greek law. Additionally, we carry out sample inspections in order to ensure the quality of the equipment prior to receipt.

Our systematic research in the market for new technologies, which contribute to making equipment more environmentally friendly (in terms of the materials and energy consumption) has already resulted in the upgrading of the equipment provided to consumers for accessing the Internet, thus allowing us to achieve more efficient operation of the local consumer networks.

As part of our effort to protect the Environment, we promote our services without equipment. Most Internet users in Greece already have the relevant hardware (modem/router). Thus, we stopped sending equipment massively with every new connection, so that the environment is not burdened with machines that the user does not need and require special handling for recycling.



8.5.1

"Green" Product

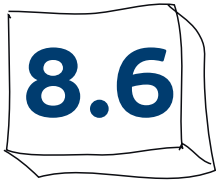
WIND Business Cloud

In the context of our innovative services that contribute to a green economy, we have developed the WIND Business Cloud service. In May 2013, we enriched the Cloud services we offer to companies and professionals presenting the Business Antivirus service.

Under strictly certified procedures, we provide the Business Antivirus service, with the Business Office Antivirus edition and the Business email Antivirus edition. Through a user-friendly and easy-to-use online environment, in the form of monthly subscription, we cover all the needs of an enterprise for proactive protection against viruses and malicious attacks, while offering safety and reliability, economy, flexibility and speed of implementation.

WIND FLEET

We have developed the innovative WIND FLEET service, providing the opportunity to companies, professionals and public agencies who manage fleets of vehicles and means of transport to reduce their operating costs, to allocate resources better and to increase their productivity by optimizing their operations and procedures. Thus, a significant reduction in a Company's carbon footprint is achieved.



Social Product

We firmly believe that technology can help vulnerable social groups. Thus, we contribute to meeting their telecommunications needs aiming to reduce social exclusion.

✓ **Special offers**

✓ In 2013, continuing our active support of vulnerable social groups, we offered a discount on fixed telephony and internet, and free use of mobile services (prepaid and postpaid) to subscribers who are entitled to Manpower Employment Organization (OAED) benefits, whether they were new or existing WIND customers.

✓ **WIND Care**

Through the WIND Care program, provided the option to people with disabilities (hearing impaired, families of individuals with severe learning disabilities, autism, physical and multiple disabilities) of communicating via SMS at half-price. Individuals who are entitled to join the program may be new or existing subscribers with postpaid or prepaid packages.

Social Contribution Lines

✓ **The “I offer” service**

This is a joint charitable initiative of the three mobile telephony 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 as they wish (at a cost of €1 + VAT). Thus, they are able to financially support a non-profit / non-governmental organization every time they do so. In 2013, the service was activated 18 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 charity, without any deduction. The amount gathered in 2013, through “I offer” for various organizations, was €51.537



✓ "SOS Children Villages"

Since December 2011, we have enabled our subscribers to donate €2 to the SOS Children's Villages by calling 14567. In 2013, WIND subscribers donated **€3.315,374** to SOS Children Villages.



✓ "European help line for children"

We support the European helpline 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.



✓ "Arc of the World"

Since December 2011, we have enabled our subscribers to donate €2 to the Ark of the World by calling 14849 or by sending SMS to 54232. In 2013, WIND subscribers donated **€6528,8075** to the Ark of the World.



✓ "Support line for children and adolescents of APhCA"

The support line for children and adolescents, **116111**, is a toll-free phone number which any child or adolescent up to 18 years of age can call in order to speak with qualified mental health counselors. WIND acknowledges the importance of prevention and treatment of mental health problems related to childhood and adolescence by offering its subscribers access to this phone number.

Help Lines



✓ "Amber Alert Hellas"

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



✓ "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. Moreover, we provide them the option to donate €2,01 by calling 14545. In 2013, **€116.689,58** was given to the organization "Smile of the Child".

Emergency Lines

Through our network, we provide our subscribers the option of free calls and SMS messages to emergency numbers such as 100, 166, 199, 112, 197 and 108, even in case of barriers due to debts. In 2013 **2.040.187** such calls were made.

8.7

Responsible Marketing

The programs we provide are in accordance with the regulations and optional codes concerning communication and marketing, aiming the fullest possible information to the consumer about the benefits of our products and services. Thus, we ensure that our communications and promotional material is legitimate with the Greek Code of Advertising - Communications (GCA-E), the provisions on unfair competition and consumers' protection and the overall existing Greek legislation. We follow and adhere strictly to the regulations/guidelines of the Communications Control Council (S.E.E.).

8.7.1

Communication Principles

Communication strategy is of major importance to all of us at WIND. We focus on the need for exceptional and effective communication that differentiates WIND from the rest of the market, and reinforces its image. In this context, having as main objective the fulfillment of our commitment towards the customer and to offer the best possible service, we define 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 & services through every channel of promotion. More specifically, our websites (wind.gr, f2g.gr, myq.gr) are key channels of communication with consumers since every information is presented in full detail, making clear every separate element. Furthermore, through our e-shop, wind.gr, visitors can choose the program or device that suits their own needs and complete the purchase easily and quickly. In a further effort for the public to take proper, understandable and clear information, special attention is given to 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.

Directness

In 2013, we continued to invest in a 360-degrees 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, investing more in the part of “e-care” and further developing the access ability from desktop, tablets or smartphones. This strategy is aiming to offer a high level of customer support. We now offer the possibility of direct service, on-the-go access and purchase of products and services through the myf2g and myQ app. Furthermore, subscribers can manage their connections through myWIND service. As a result, our communication with consumers becomes, year after year, more direct and easily accessible from everywhere.

Honesty

At WIND, we make substantial efforts so that our communication is consistent with the principles of fair competition, respecting the Code of commercial and social communication. Our aim is to build trusting relationships with existing and potential customers. That is why we invest in ads that gain public acceptance, explicitly communicate every product information, and are not against the Code of Advertisement. It is worth noting that, in 2013, WIND **had only 1 control request from the Communication Control Council, among 16 applications in this category.**

8.7.2

Fair Competition

Furthermore, we fully apply the provisions about unfair and free competition. In this context, we have not received any appeal for violation of fair competition during the period of the Report.



8.7.3

Codes of Conduct

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

- ✓ Code of Conduct for Provisioning Electronic Communications Services to Consumers (Dec. 488/82/30-7-2008 EETT), as in force.
- ✓ Code of Conduct for Providing Multimedia Information Services (Dec. 451/10/1-10-2007 EETT), as in force.

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

- ✓ «Code of Conduct for value added services offered through mobile phones and the protection of underaged users »,
- ✓ «European Memorandum on safer mobile use by children and adolescents», that have been signed and applied among Mobile Telephony Service Providers.



Intellectual Property Rights & Communication Privacy

In every contact we sign with consumers we include strict conditions in relation to the **protection of intellectual 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.

Furthermore, we have signed a Cooperation Framework with the local Collective Copyright Management Organizations 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 clients is in full compliance with the legislation on the protection of individuals from the processing of personal data.



Customer Satisfaction



Measurements & Evaluation

Our research program, in 2013, consisted of tracker surveys conducted in continues waves as well as ad hoc surveys that explore specific issues when they arise. Both research approaches have a common goal: understanding consumer's telecommunication needs, so that we offer the best services.

Tracker Surveys

In particular, independent research agencies completed 8 wave surveys that aimed to a) evaluate communications (post air) of the telecommunications category, b) monitor specific “health” indices for our Company, and c) investigate our customers satisfaction in important dimensions, such as coverage, programs/bundles etc. The findings of this survey give us the opportunity to design interventions / corrective actions so that customers are always satisfied with our services and products.

Ad Hoc Surveys

Ad hoc surveys provided us with valuable insights on topical issues the organization faces. In 2013, more than 15 projects took place, both qualitatively and quantitatively.


Mystery Shopping

Stores

Always trying to improve our stores, in order to offer the best service to our customers, we designed the Mystery Shopping program.

Mystery Shopping is a valuable tool that gives us the opportunity to constantly monitor our key pillars of service in our stores so that we take corrective actions.

Call center – WIND partners

 In 2013, we conducted “secret visitor” surveys in 9 of our call centers – partners with about 48 calls per call center. The objectives of this survey are listed as follows:

- ✓ evaluation of behavior
- ✓ recording of agent’s style/mood
- ✓ recording the correct diagnosis of the needs of the potential customer
- ✓ evaluation of sales procedures

The aforementioned objectives provided valuable material for taking corrective actions were considered necessary.

Image Survey

In late 2013, we designed the research program for the image of the networks. More specifically, we scheduled 8 focus groups with users of all networks (contract and prepaid users) in order to investigate WIND's, as well as competition's image. For the purpose of the survey projective techniques were used. This survey has provided valuable "insights" on how consumers perceive us, what are our strengths and what points need to be strengthened.

WIND Stores Customer Satisfaction Survey

Aiming to continuously improve our customer's service level in WIND stores, we designed and implemented pilot specialized customer satisfaction surveys. As part of the survey an important sample of our customers that were served in a number of our stores were asked to evaluate their total experience in the store, the speed of service, know-how and knowledge of the salespeople and other parameters. The results of the survey revealed the high level of our customers' satisfaction for the service they received in WIND stores, which is the best proof of our commitment to offer high quality services.

Preventive audits for fixed telephony and surveys for prepaid telephony

In 2013, we made more than 185.000 calls/customer contacts in order to ask our customers' opinion about our services, and renew their contracts/deals.

In addition, through in-stores surveys (once per week), we recorded any difficulties, comments and requests from the shops. In this way, we were able to make relevant changes and modifications of our systems in order to improve our prepaid customers' satisfaction in our stores. As stated by the representatives of the stores: **"Prepaid telephony turns a page in the service of its subscribers in the stores!"**

The first phase of change of the recharge system inside a store is already in operation, such as information about the prepaid subscriber, printing a note describing the transaction of the subscriber & his bundles, creating daily report of activated packages per vendor code, etc.



Customer Service Department

In 2013, we continued the customer satisfaction survey in WIND mobile and fixed telephony subscribers, who contacted the respective Customer Service Department. In order to secure the results, the survey is automatically conducted, through a mechanism of random selection of 1/3 of the incoming calls to the Mobile & Fixed Telephony Customer Service Departments respectively.

Through the results we obtain, which are communicated to the Management, we form an image about the satisfaction of our customer base, aiming a bidirectional Customer-Company communication, investigation and measurement of customer satisfaction, and data collection that will result in a more accurate planning of future movements to meet customer needs.

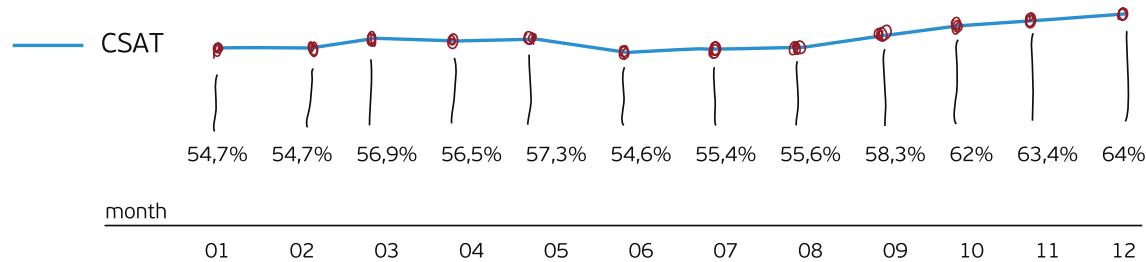
In the following charts you will find, based on the answered questionnaires, the average percentages per month in 2013 of the subscribers that contacted the Mobile and Fixed Telephony Customer Service Departments and stated that the telephone service they received was Excellent and Good enough.



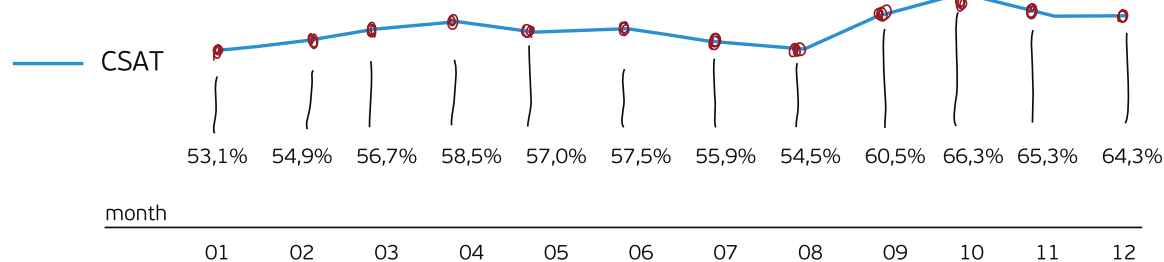
Figures 1 & 2

"How would you describe your overall experience from your Call Service?"

Mobile CS
2013



Fixed CS
2013



Based on the results, we set long-term goals with main axis the increase of customer satisfaction percentage. The goals are gradually implemented, and we achieved in 2013 a ten percentage points increase of customer satisfaction, by comparing the results of the first and the last months of the same year, as shown in the above mentioned charts. This increase was the result of a systematic effort and collaboration of various departments of our Company, focusing on continuous training of the existing workforce (Refresh Trainings – Post Updates) of the Customer Service Departments and at the same time staffing them with new employees.

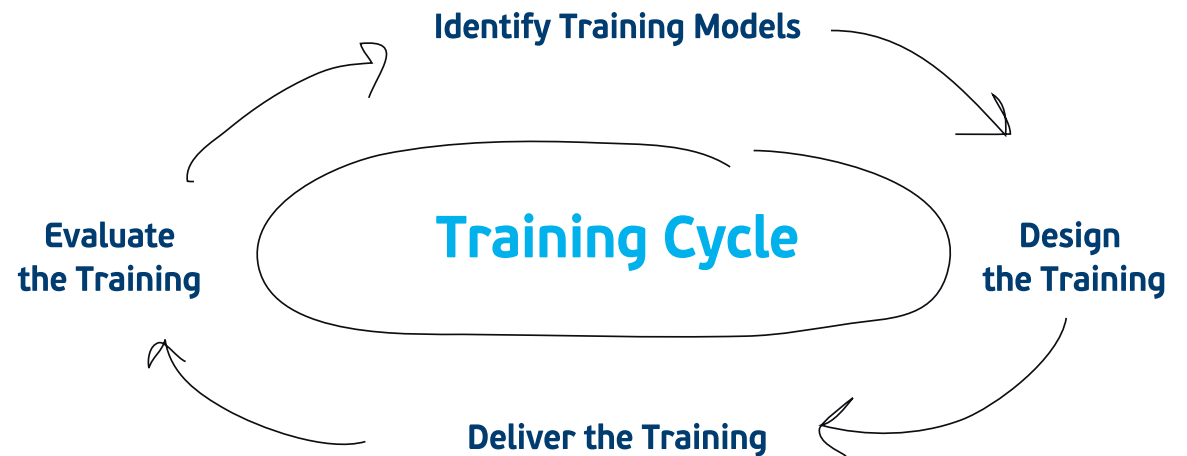
8.9.2

Response & Redesign

Education - Information

The training philosophy is based on the participation of all employees in training activities, so that they acquire relevant knowledge and skills. Each training cycle is based on the recognition and analysis of the training needs, the design of the educational activity for the realization of the targeted educational programs, and the evaluation of the educational outcome.

Figure 3



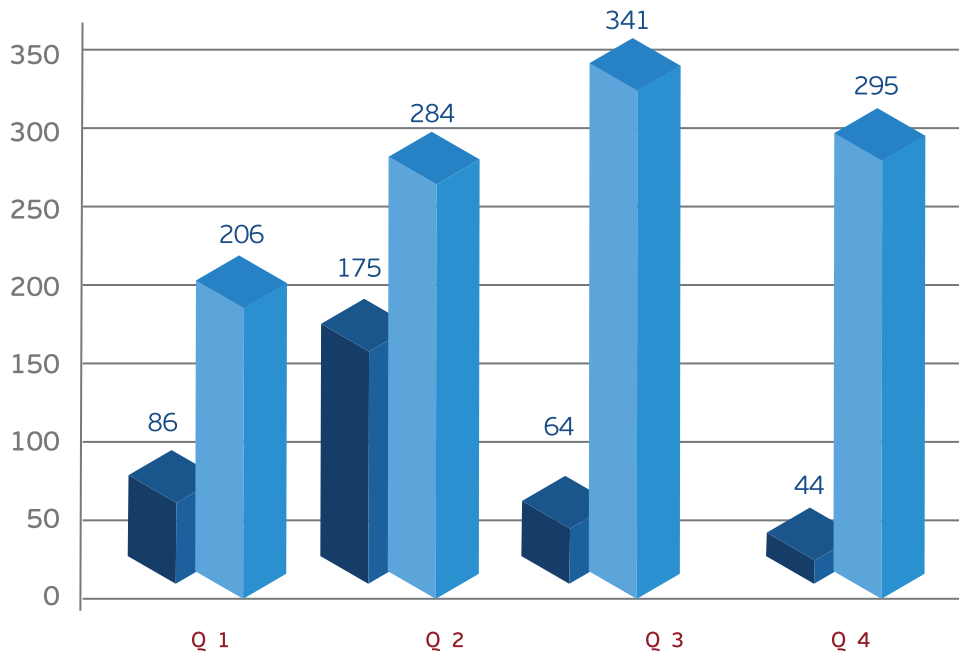
In 2013, 1.126 hours of education took place on 369 employees (existing and new) that work on Mobile Telephony Customer Service Departments. The educational programs conducted during the year covered needs in:

- ☞ existing subjects to specific individuals or groups, in order to strengthen their knowledge and skills
- ☞ new procedures, new bundles/services, new versions of systems
- ☞ knowledge of new employees in order to develop their skills to meet the needs of their new duties

Below you will find a diagram showing the average number of courses conducted and the number of trainees who attended, employed in Fixed Telephony Customer Service Department, for each quarter of 2013.

Figure 4 Training Hours & Number of Trainees

■ Total Numbers of Trainees
■ Total Training Hours



In the context of everyday assurance of immediate update of the Customer Service Department on the changes and developments in telecom industry, updates are posted on a single information management database, which has been created and maintained on a daily basis. This database is the main update tool that the employees of the Customer Service Department use for the accurate and prompt service of the entire customer base. This internal knowledge tool is called Tool for You (T4U) and operates in a digital form, having structured information per unit of products and services.

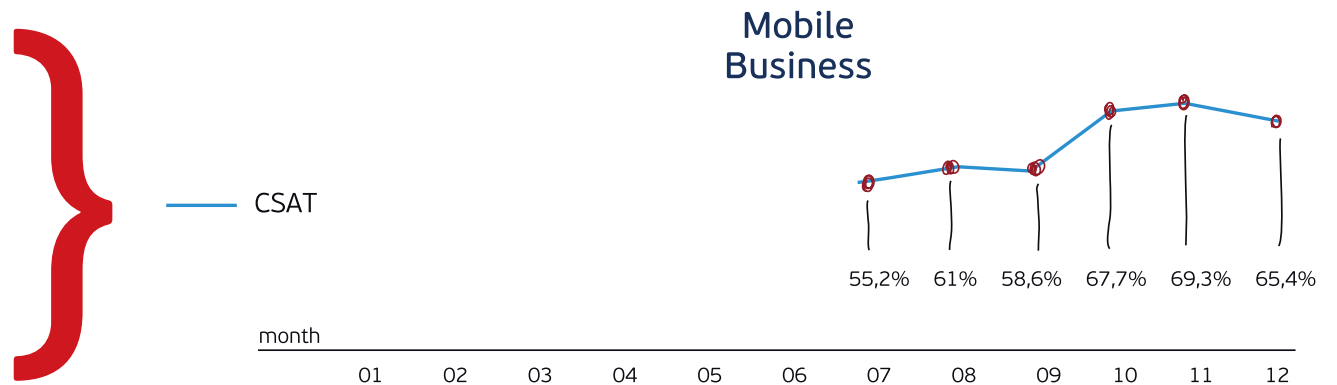
Redesign

As part of redesigning the way corporate mobile telephony subscribers are serviced, we created, from July 2013, a special Corporate Mobile Telephony Subscribers Service Department, which consists of representatives trained to respond exclusively on calls related to corporate subscribers. The Department was created having in mind flexibility and immediate service, helping to improve customer service experience.

Below you will find a diagram, bases on questionnaire responses, with the average percentages of subscribers that contacted the Corporate Mobile Telephony Subscribers Service Department from July 2013 until December 2013, and replied in the question "How would you describe your overall experience from your Call Service?" that the service they received was Excellent or Good enough.

Figure 5

"How would you describe your overall experience from your Call Service?"
(Excellent & Good Enough)



8.10

Focus on the Customer

We listen to the customer

Those people of WIND that don't come every day in contact with our customers, in 2013, participated in organized visits to the stores and service centers bringing back ideas on how we can improve the customer experience.

Objective of the program is to:

- ✓ Live the experience of real-time market
- ✓ Better meet the market, the products and services as well as the customers of our Company
- ✓ Better understand how our role effects the operation of the stores
- ✓ Encourage the proposal of new ideas for improving customer experience
- ✓ Commit to improving customer experience.

In 2013, 61 executives were involved in this initiative and they made over 100 visits to WIND stores and Call Centers.

Responsible Procurements

Our relationships with suppliers are based on strict 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 or/and 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:

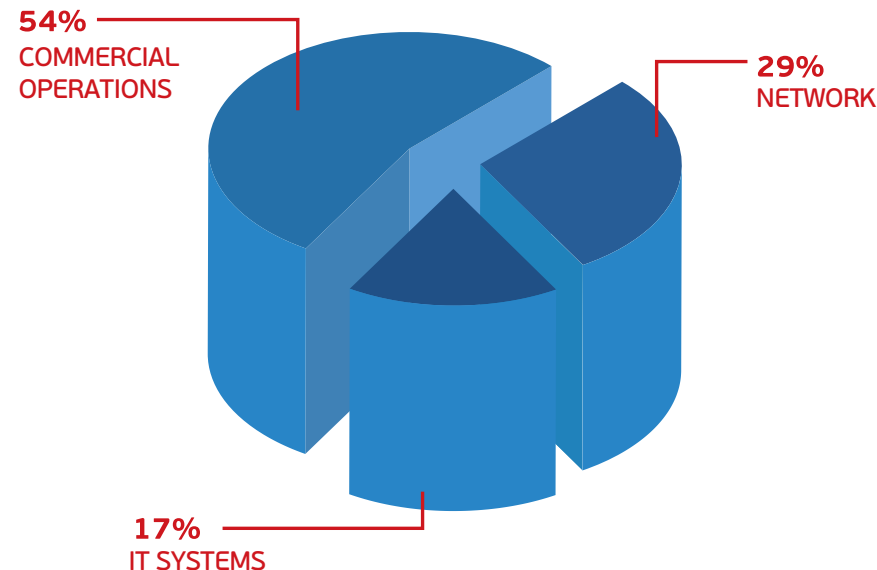


In order to ensure the integrity of the operation of our Supply Chain department, the transparency and the avoidance of any incidents of corruption, the selection and evaluation of our suppliers, the tenders and the daily procurement activities are carried out on the basis of detailed, documented and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

In addition, in 2013, in the context of promoting Corporate Responsibility in our supply chain, we sent the “Code of Conduct of WIND Hellas” to our suppliers, having set as a necessary condition of cooperation the acceptance of the Code. 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 2013, the relevant department of WIND 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. During the current year, we evaluated according to the specific procedures our **54 largest suppliers and we found 1 relevant offense** for which we made all the necessary actions and took all the necessary measures.

Figure 6

Percentage of suppliers evaluated per category of product/service



8.10.1

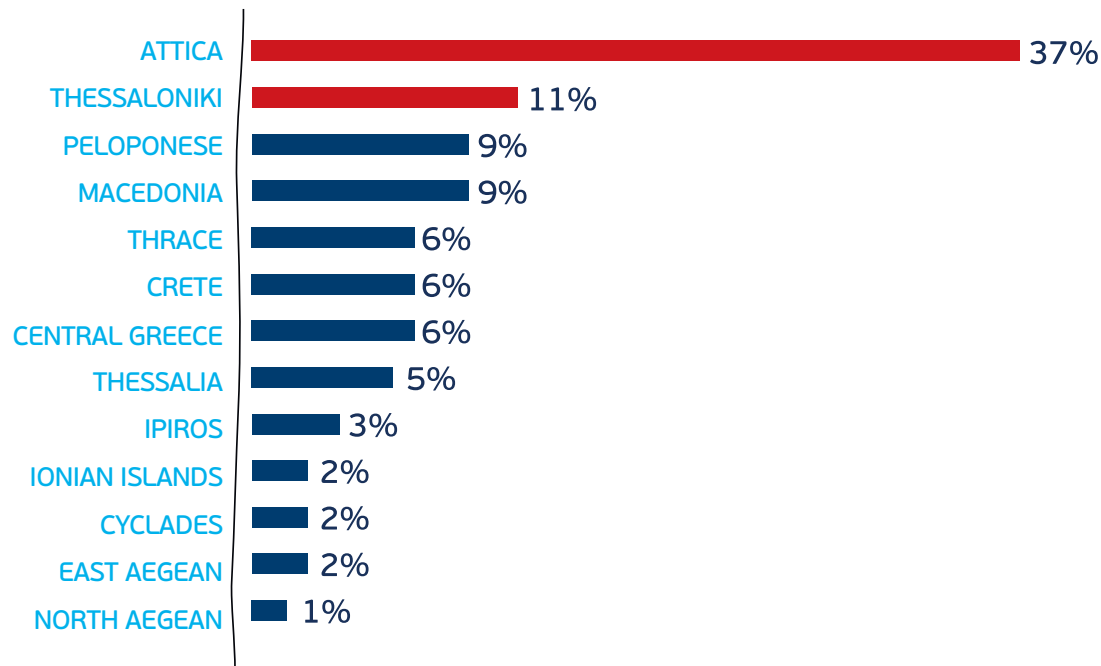
Local suppliers

Along with the implementation of our commitment that WIND stores should be next to every customer at any time, we have contributed to the development of local economy supporting and developing more than 126 WIND stores, in areas outside the two major urban centers of the country. Moreover, we support local markets. We use local companies - which are outside the two major urban centers- mainly for building/ construction works, while with respect to purchases of promotional materials and printing work, we typically use Greek companies.

The percentage of spending on local suppliers (Greek companies) was about 90% of WIND's total expenditures for 2013. The majority of spending on non-local suppliers relates to the purchase of telecommunications products for which there is no local representation of the company in Greece.

Figure 7

Geographical Distribution of the WIND chain stores





Objectives 2014

✓ Services

- 🔗 create combined products, in order to cover telecommunications needs
- 🔗 provide online tools to the end user that will give a better picture of the quality of his services, his account and the ways to manage them
- 🔗 provide fixed telephony and Internet services to new areas, with an expansion plan at 12 telecommunications nodes and expand the availability of VDSL in an additional 30
- 🔗 invest in maintaining the customer base and ensure revenues with targeted actions and tailor made offers according to the different needs of subscribers
- 🔗 further development of prepaid products and services targeting to the needs of the most demanding target audience (youth)
- 🔗 strengthening the privileges and deals via online products (www.f2g.gr, www.myq.gr)
- 🔗 continuous improvement of the prepaid subscriber's experience across all channels of communication (stores, online, etc)

✓ Responsible Procurements:

- 🔗 Adaptation of a new e-procurement tool, for further development of the effectiveness and efficiency of the Procurement department. This tool is expected to speed up the overall operation of the department, to improve the monitoring and evaluation of key indicators and assist greatly in the maintenance of transparency of all procedures.
 - 🔗 Development of the quality characteristics of our supply base and certification of all our suppliers, by signing new general procurement conditions and accepting our code of conduct.
 - 🔗 Continue the evaluation of our major suppliers, through on-site visits.
-
- ✓ Expansion of the survey throughout the entire WIND store network so that it becomes a powerful tool for the evaluation and improvement of customers experience in our stores.
 - ✓ Continuation of actions aiming to optimize our customer's experience, redesigning and further simplifying the procedures and mechanism of our daily operations.
 - ✓ Continuation of our employees scheduled visits at WIND Stores and call centers aiming to focus on improving customer satisfaction.

9.

Environment

We minimize our environmental impact, focusing on the reduction of energy consumption, recycling materials and development of our network infrastructure in an environmental friendly manner, whilst motivating our stakeholders on environmental protection issues.



2013

Recognizing our responsibility towards the Environment and Sustainable Development, we are directing our business activities with respect to Environmental protection and the principles of Sustainability, trying to respond to the challenges of our era in a dynamic and meaningful way by investing in management measures and actions that matter.

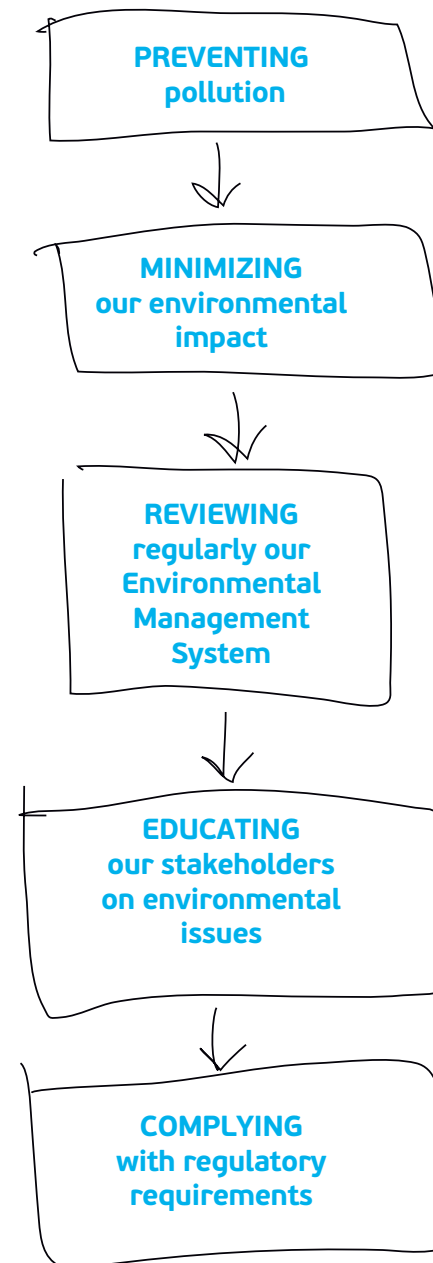


- ✓ We reduced our overall energy consumption by 12,78%
- ✓ We reduced the overall CO2 emissions by 4,65%
- ✓ We reduced the emissions due to the use of diesel generators by 38%
- ✓ We reduced the emissions from vehicle fuels by 17%
- ✓ We saved 115 tons of paper
- ✓ We replaced 155 vehicles with new low-consumption models

9.1

We manage Environmental issues with consistency

At WIND, the protection of natural environment is our firm commitment. In order to manage our environmental impact in the best way, driven by simplicity and flexibility, we designed, apply and maintain an Environmental Management System certified by ISO14001:2004. Through this management system, we analyze and prioritize, monitor and record every aspect related to our environmental impact, actively promoting improvement.



Significant Impacts

The process of identifying, analyzing, evaluating and managing the environmental impacts from the operation of our Company leads us to take actions in order to minimize and eliminate these impacts in a manner that is consistent with the strategic plans of the Company. The list of significant impacts and their evaluation is updated on a regular basis or whenever a significant change occurs in the operation of our Company. The objectives are set on an annual basis, after they are double checked.



Table 1

Significant Environmental Impacts from our operations

Issue	Environmental Impact	Action	Objective 2013	Result 2013
Energy Consumption (Mobile and fixed telephony bases network)	Depletion of natural resources, atmospheric pollution, contribution to climate change and atmospheric acidification	Energy saving projects (equipment renewal, hybrid power systems)	Energy reduction by 19.000GJ (Electricity and fuel use) from the operation of fixed and mobile telephony stations	The energy consumed at the base network was reduced 23.700 GJ
Energy Consumption (Telecom buildings, offices, vehicle fleet)	Depletion of natural resources, atmospheric pollution, contribution to climate change and atmospheric acidification	Energy saving projects (systems update, vehicle fleet renewal)	<ul style="list-style-type: none"> • Replace at least 35 corporate vehicles with newer technology models • Reset the power consumption of the headquarters at 2011 levels 	<ul style="list-style-type: none"> • 155 vehicles were replaced and 89.333 liters of fuel or 149,88 tons of CO2 were saved • Energy consumption at 2011 levels was achieved
Waste production	Depletion of natural resources, creation of pollution, landfill saturation	Actions with the threefold focus "Reduce – Re-use – Recycling"	Reduce paper use by at least 7.000.000 sheets or 35.000 kg	Reduction by 115 tons (over 20.000.000 A4 sheets)
Electromagnetic energy 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.	Monitoring emission limits with field measurements made by labs certified by ISO17025	25 field measurements were made
Air conditioning of facilities	Atmospheric pollution, depletion of the ozone layer, contribution to climate change	Unit checks, replacement of coolant with zero ODP and reduced GWP.	Replacement or conversion of cooling systems in order to eliminate the use of HCFC by the end of 2015	3 additional air conditioning systems were replaced



Climate, Energy and Energy Management

In 2013, expenses recorded as environmental protection, such as waste management, maintenance of the ISO14001-certified Environmental Management System, and compliance with obligations under Law 2939/2001 on alternative waste management, amounted to fifteen thousand euros approximately.

Regarding fines and penalties for non-compliance with environmental legislation, there were no relevant financial or non-financial penalties or actions in 2013.

Climate change is expected to have significant impact in Greece and the Mediterranean in general. Environmental conditions affect directly or indirectly the operation of networks and infrastructure. The temperature increase, the rainfall reduction, especially in the southern areas of the country, the increase in forest fires and their intensity and the increasing intensity of weather events can have significant impact on the operation of telecom networks, and WIND. In this context, the most important impact is likely to be the increased incidences of break-downs and/or damages in the infrastructure network and the increased operating cost and required investments.

The rapidly evolving technology in the industry and the design of equipment focusing on energy saving, allows the upgrade of infrastructure in a way that the increased needs of users are served and the growth rate of emissions is reduced in relation to the increased capacity of the network. In some cases, when the potential savings due to the replacement of obsolete equipment is large enough, **a reduction of the overall footprint can be achieved.**

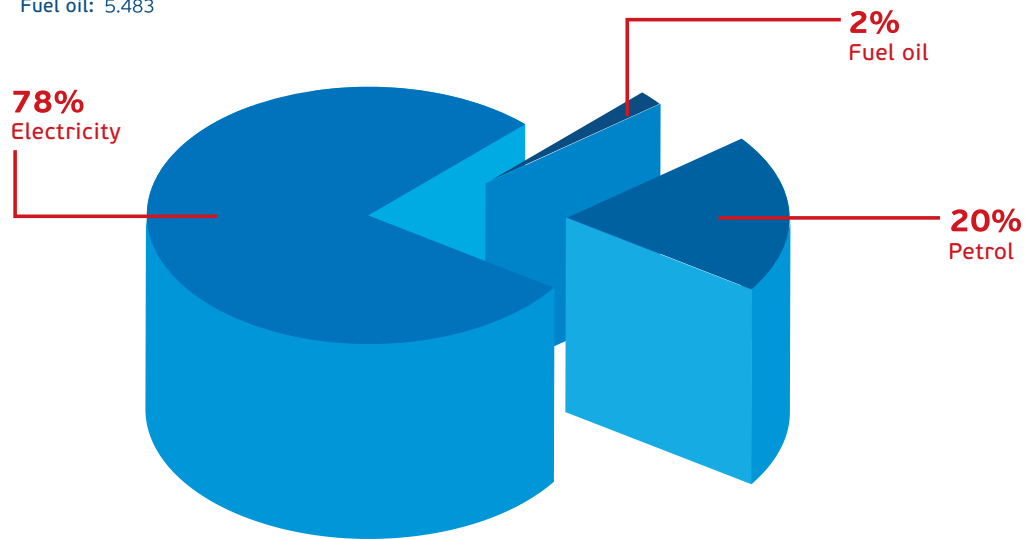


In 2013, at WIND, 306.589 GJ of energy was consumed in totally, taking into account fuel consumption². The above consumption is reduced by 12,78% compared to 2012 or 44.904 GJ less.

Figure 1

Energy Consumption Distribution 2013 (GJ)

2013
Electricity: 240.381,56
Petrol: 60 724
Fuel oil: 5,483



As you can see in Figure 1, the energy consumption is depicted in 3 categories: Gas and Oil which is direct energy consumption and Electricity which is indirect energy consumption.

The direct energy consumption is from non-renewable primary sources.

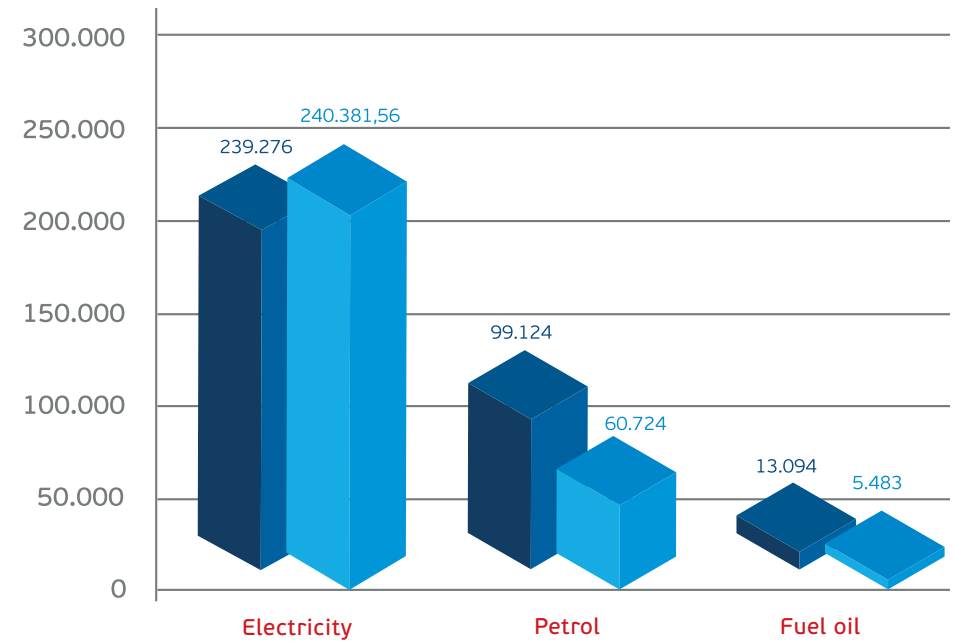
Figure 2

Total Energy Consumption 2012-2013 (GJ)

2012
Electricity: 239.276
Petrol: 99 124
Fuel oil: 13.094

2013
Electricity: 240.381,56
Petrol: 60 724
Fuel oil: 5,483

■ 2012
■ 2013



The objectives for energy we had set, for an overall reduction of 19.000GJ, were more than covered. The indirect energy used is from non-renewable primary source.

² Stores chain is not included

In 2013, the total emissions³ were 74.366 tons of CO₂e, reduced by 3.624 tons compared to 2012, or 4,65%. The pollutants that correspond only to the use of energy⁴ amounted to 71.591 tons of CO₂e, also reduced compared to 2012 by 4,15% or 3.096 tons⁵

The major sources of pollutants is **electricity** and **fossil fuels**, which amount to 95,6% of total emissions.
Other sources are **corporate vehicles**, **corporate trips**, and **refrigerants**.

Figure 3

Pollutants distribution per source (tnCO₂e) 2013

2013

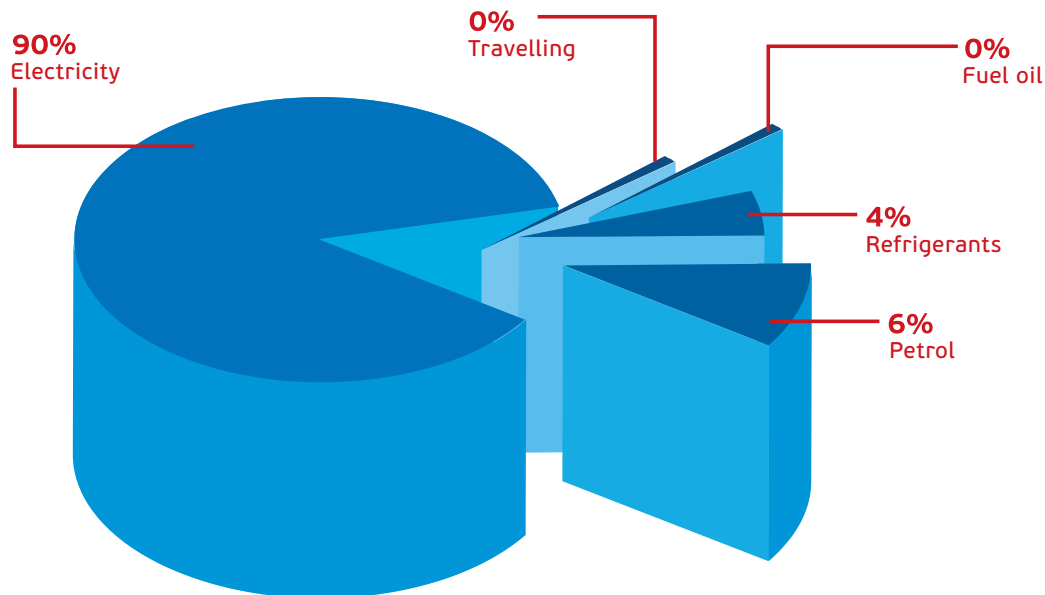
SOURCE OF POLLUTION SOLAR ENERGY: 66.572

SOURCE OF POLLUTION PETROL: 4.539

REFRIGERANTS: 2775

SOURCE OF POLLUTION FUEL OIL: 365

SOURCE OF POLLUTION TRAVELLING: 114



³ Total emissions include pollutants from any form of energy consumption (electricity from PPC and use of fossil fuels for electricity production, buildings heating and vehicles transportation), as well as the estimated emissions from corporate trips (by air and sea) and refrigerant leaks. Stores chain is not included

⁴ The pollutants emissions from energy consumption don't include corporate trips and refrigerant leaks. Corporate vehicles fuels are included.

⁵ To calculate emissions we use the most recent calculation guide of the World Resources Institute (World Resources Institute 2008 : GHG Protocol Tool for Stationary Combustion Version 4(2010). Emissions from electricity consumption form an exception, for which we use the average conversion coefficient of the Public Power Corporation for 2009 set to 0,997kg/kWh.

9.2.1

We focus on reducing electricity consumption

Figure 4

Pollutants emissions 2012-2013 (tnCO₂e)

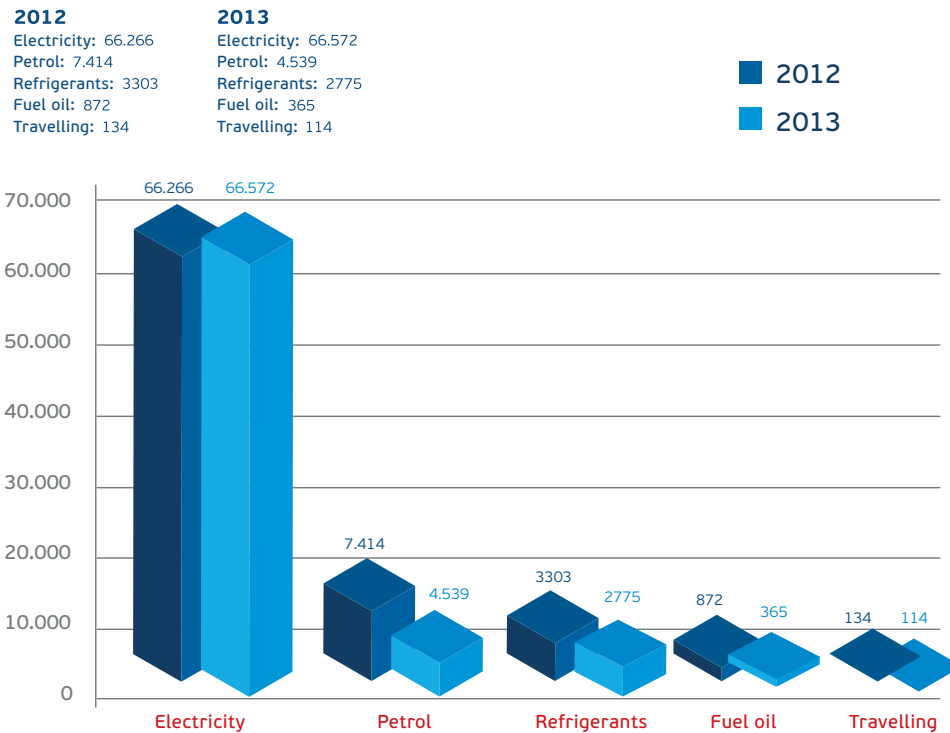
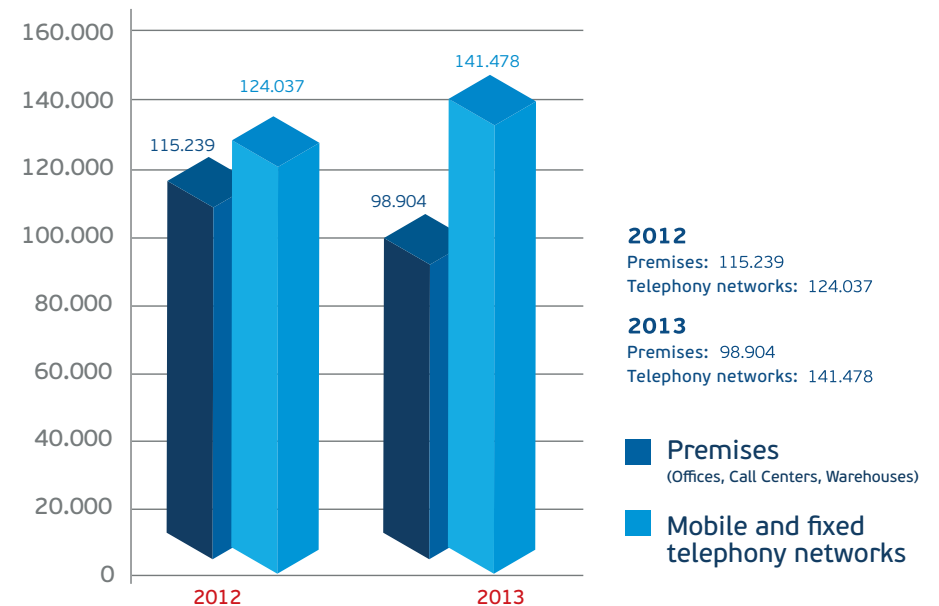


Figure 5

Energy Consumption Distribution 2012-2013 (GJ)



✓ Radio Network Update

In 2013, we continued the update of the Radio Network replacing **255 additional base stations** with equipment of the latest technology that combines technological upgrading and energy saving and can bring savings in consumption of almost 15% per base station that is replaced.

Nevertheless, in 2013, there was an increase in the total energy consumption of the entire mobile and fixed telephony network by 17.440GJ. Respectively, the consumption index per mobile and fixed station was increased, and reached 26.698KWh/station compared to 24.698KWh/station in 2012.

The reason for this increase is the combination of an increased network traffic with the parallel connection of a number of base stations to the grid, since we stopped the use of electricity generator sets to power the stations. At the same time, there was a decrease in energy consumption from not using petrol due to the reduction of the available number of electricity generator sets.

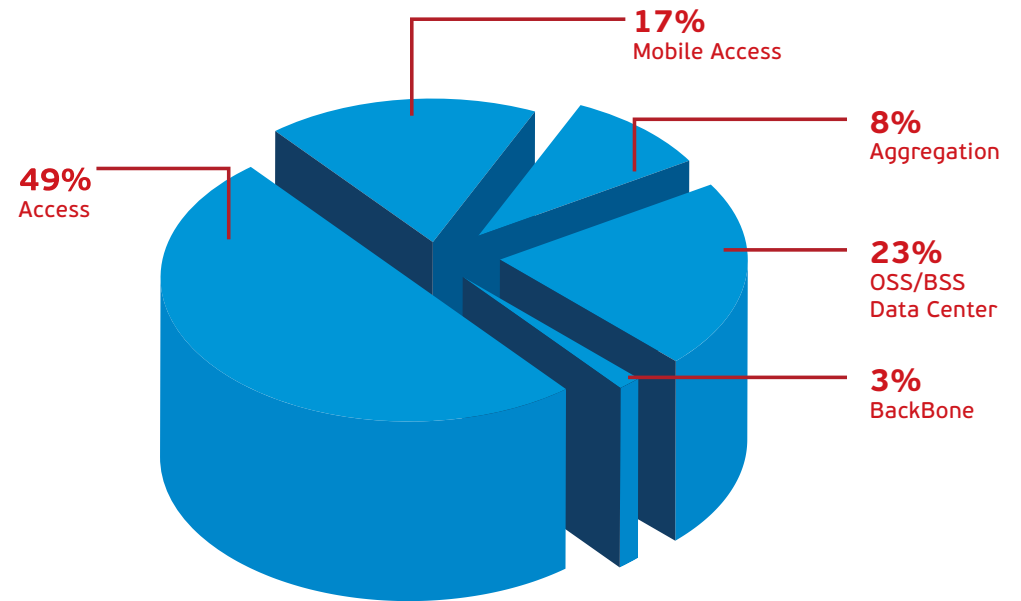
✓ Equipment Upgrade in Telecommunications Centers and Data Centers

Replacement of telecommunications equipment in telecommunications centers

In 2013, a network upgrade project was implemented replacing existing equipment with new of modern technology. It is estimated that apart the access network (access / base stations) that consume almost half of the total energy consumption in the network, the other half concerns the Core and Access equipment (except from the base stations) and therefore there is a significant margin for improvement.

Figure 6

Distribution of energy consumption in a mobile telephony network⁶



The replacement of the equipment is expected to bring significant energy savings to the network backbone, on top of course of the upgraded mobile data network services we will offer.

⁶ From : G. Koutitas, P. Demestichas, 'A Review of Energy Efficiency in Telecommunication Networks', Journal TELFOR, ISSN: 1821-3251, 2010

Table 2

Energy performance of new data network equipment

		Old equipment	New equipment
SAPC	Energy per 100K subscribers	N/A	6,1W
GGSN / EPG	Energy per 100K PDPs	52W	40W
SGSN	Energy per 100K SAU	98W	50W

We estimate that up to 1.000MWh of electricity can be saved from the implementation of this project.



Replacement of the old servers of the IT Department with new ones

We consistently invest in upgrading the infrastructure of our IT Data Centers, having already implemented projects in previous years, such as the installation of Blade systems and the application of virtualization techniques, thus reducing energy consumption and saving space and equipment cooling requirements.

In 2013, we changed the old Enterprise servers with new generation ones, with a key aim to reduce operating costs and save resources in terms of power consumption, air conditioning and space in Data Centers. The solution related to systems such as the core ERP system, the Data Warehouse and specialized telecommunication applications.

As a result, there were immediate savings of space in WIND Data Center, while electricity consumption reduction was noticed immediately and indirectly in terms of air conditioning. Another benefit is the increased responsiveness of the applications providing a better experience to the end user.

Consolidate individual storages of the Network Department and integrate them into the core storage system of the IT Department

In order to improve the overall service we provide to our customers, to reduce operating costs, as well as to be prepared for the upcoming market challenges, we implemented another project in 2013, in order to consolidate our storage infrastructure, into the core storage system of IT Department (storage consolidation).

The benefits from this project are multiple, while the most important is resources savings, in both electricity consumption – **estimated reduction of 35%** - and space (at least 50%). Furthermore, there will be a drastic reduction in supporting costs, since the solution will involve a single and central platform and equipment management will be simplified.



Building infrastructure

Headquarters energy consumption

Following the increase in energy consumption at the Headquarters of WIND in 2012⁷, we re-regulate the operation of air conditioning units in order to optimize the operating hours and to restore consumption indicators at the levels of 2011. Overall consumption finally reached 9.400GJ, reduced by about 5.785GJ compared to 2012.

⁷ The average maximum temperature in the summer months of 2012 was increased by at least 3°C for Attica, according to the weather reports of HNMS.

Table 3

Average electricity consumption index on Headquarters for years 2011-2013

Year	Average consumption per square meter (GJ)
2013	0,28
2012	0,46
2011	0,34

In 2013, energy consumption in telecommunication centers decreased by 10.507 GJ. This reduction is due to the implementation of the equipment replacement projects and the interventions implemented in the building, as described below.

Upgrade and automation of air conditioning-ventilation systems

Air conditioning-ventilation is one of the most energy consuming pillars of a premise. In 2013, we implemented an upgrade and automation project of the HVAC⁸ system (according to EN 15232) following the principles of ISO50001 for the energy management and the energy profile of our Company. The results of the project will be seen in 2014.

Regulation and reduction of Data Centers' temperature

As mentioned above, air conditioning is a significant part of the energy consumption in a building. Especially in Data Centers, in 2013, we followed the instructions of the prestigious body ASHRAE⁹ for the optimum operating temperature of Data Centers, and we increased the temperature profile of critical areas by 4°C.

Future Interventions

In 2014 we will move to re-insulate the ducts in our older buildings, with special material, aiming at reducing temperature loss from the ducts. In addition, we will proceed to the optimization of temperature isolation floors in most building WIND, work that can significantly improve the energy profile of the building and save a lot of electricity. Mechanical interventions also planned in Twin booster system which we study the replacement with energy saving benefit of such equipment and stabilize the water supply throughout the building. Still, plan and control motor pumps (Inline) with drives (Inverters), project from which we also estimate a significant reduction in electricity used for these engines. Finally, to better manage the energy profile of the most energy consuming building we plan to bring all consumptions (WAGES-Water - Air - Gas-Electricity) by building to a unified base of energy data, project particularly important since it allows us to design the continuous improvement in energy efficiency of buildings.

⁸ HVAC: Heating Ventilation, Air-Conditioning

⁹ ASHRAE: American Society of Heating, Refrigerating and Air-Conditioning Engineers

9.2.2

We focus on reducing fossil fuels consumption

✓ Hybrid energy production systems at remote B/S

80% of fossil fuels we consume per year are consumed at the access network. Therefore, we focus in reducing the use of diesel. Using hybrid energy production systems that significantly reduce diesel consumption from the operation of generators, we save significant amounts of fuels. The systems have been designed in such a way that the generator operates only part of the day and a battery pack is used during the rest of the day, which is charged when the generator runs on diesel. In addition, nearly all generator sets have been replaced with hybrid systems, along with the continued efforts to connect remote offices to the electricity grid in order to eliminate the need for electricity generator sets. Thus, energy consumption in 2013 amounted 58.361 GJ, compared to 94.891 GJ in 2012, taking into account all the diesel that was used in generators, permanent and backups.

The reduction corresponds to a percentage of 40% approximately.

Figure 7

Diesel Consumption per electricity generator set
2011-2013 (Lt)

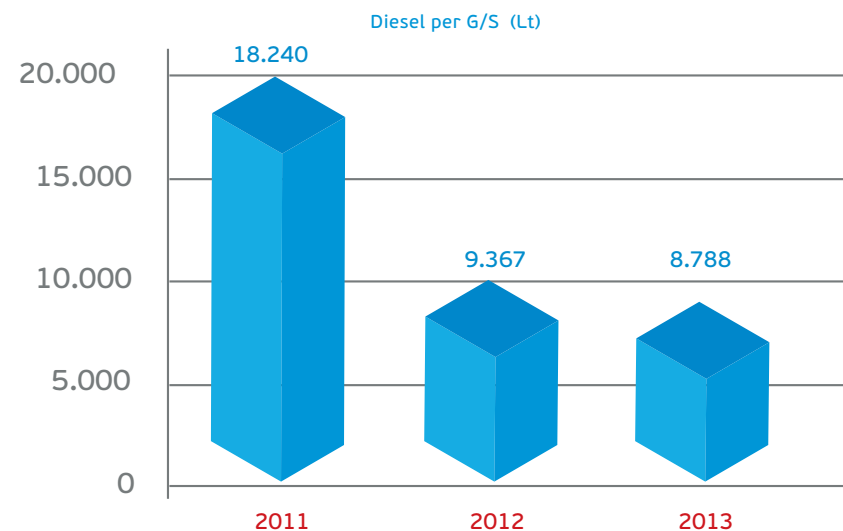
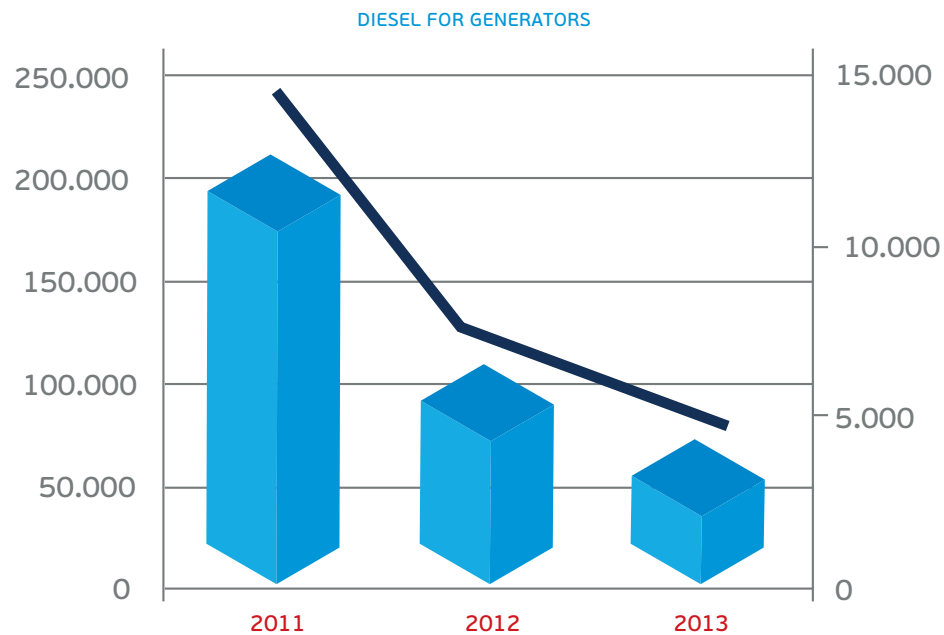


Figure 8

Diesel consumption and pollutants
for all G/S 2013 (GJ & tn CO₂e)

	GJ	CO2e (tn)
2011	193.218	14.261
2012	94.942	7.078
2013	58.631	4.371



9.2.3

Vehicle Fleet

We have a total of 213 vehicles¹⁰, which are divided into shared vehicles, that are available for corporate transportation of the staff and vehicles for personal use. There is also a small number of special-purpose vehicles (Van, mobile telecommunications equipment). Given the fact that the majority of fuel consumption is from shared vehicles, **in 2013, we replaced those vehicles with new models of low consumption and low emissions.** Upon completion of the project, more than 73% of the vehicles has an average consumption of 3,3 to 5 liters/100km and the emissions due to fuel consumed by those vehicles were reduced from 875,65 tons to 725,20 tons, that is by 17%. Furthermore, 89.333 liters of fuel were saved, an amount equivalent to 2.831 GJ.

¹⁰Data 31.12.2013

Table 4

Analysis of the characteristics of the vehicle fleet of 2013, total fuel consumption (2013) and emissions.

	Consumption range (Lt/100km)			Litres	Emissions (tnCO ₂ e)
	3,3-5	5,1-8	>8		
Diesel	155	0	5	133.760	360,08
Oil	2	47	4	159.730	365,12
Total	157	47	9	293.490	725,20



9.2.4

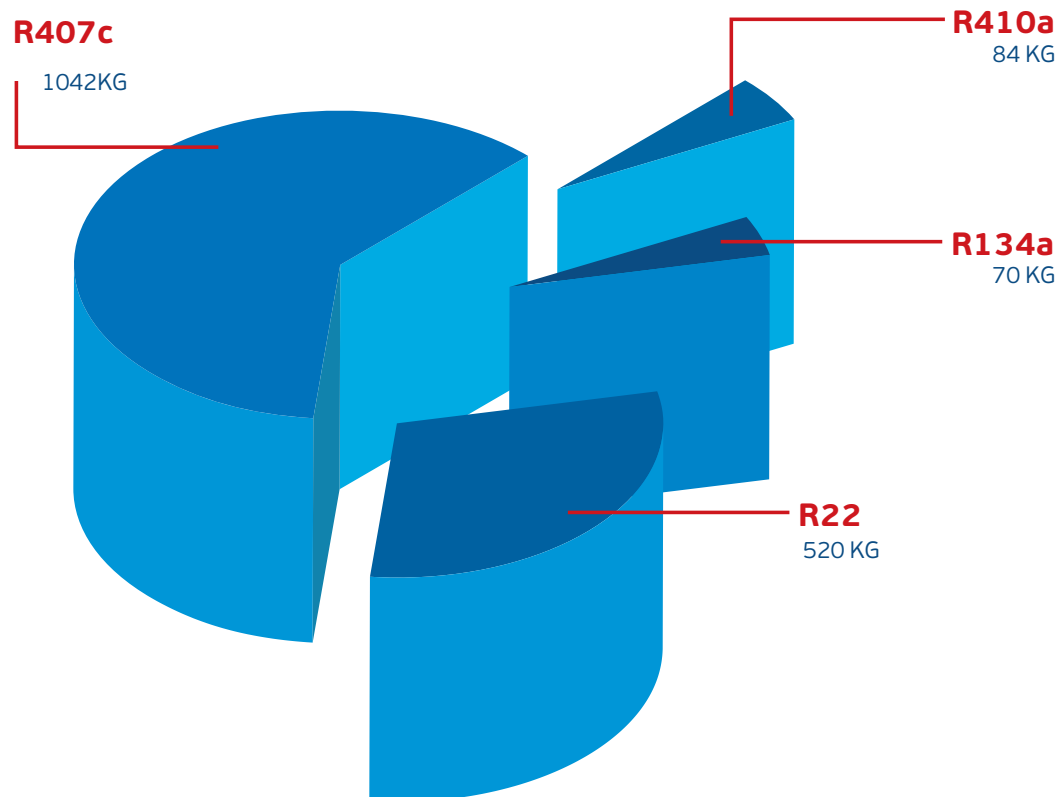
Greenhouse gases that harm the Ozon

There are no gas emissions that harm the ozon layer due to our operations, except from the use of air conditioners. Considering that the amount filled into the circuit of each machine may have potentially leaked into the environment, we take this amount into account as a charge in the environment, the climate and ozone. In order to calculate this charge, we use data of the IPCC (International Panel for Climate Change) ¹¹.

¹¹GWP 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>

Figure 9

Estimated refrigerant leaks into the environment (Kg)



The withdrawal of substances that harm the ozone is a success story for the environment in a global scale. The international commitment and the organized and coordinated actions of the last decades have brought tangible results. In this context, and since every substance doesn't have the same potential to cause the same damage to the ozone layer (eg they have a different ODP¹²) the effort is focused every time to those groups of substances with the highest ODP index. EU has decided the total ban of use of hydrochlorofluorocarbons by the end of 2014.

¹²Ozone Depleting Potential

9.3

Raw Materials Use

9.3.1

Materials Use

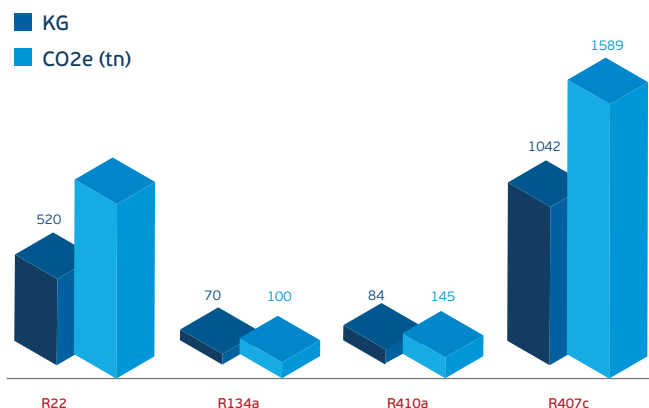
WIND doesn't have a production line that uses raw materials. We record and monitor the amount of paper for office use, the amounts of materials used for cards production (Scratch, Sim) and the packaging of imported products for which we are obliged under L. 2939/2001 on the alternative management of special steams of waste.

From our operations¹³, **in 2013 we consumed 11,1 tons of paper for office use, that is 9,75 kg/employee**, compared to 16,3kg/employee in 2012 and 13,3kg/employee in 2011.

In addition, we channeled 98,83 tons of paper into the market, 13,42 tons of plastic, and 0,96 tons of wood from our products and their packaging. The packaging are **store bags** (mainly plastic, from degradable material) and **packaging from imported products** for which we finance their recycling through the relevant collective packaging management system or **airtime recharge cards** and **SIM cards produced and sold on our behalf**. **The amount of materials we used directly or indirectly in 2013 was slightly increased**, thus amounted to 113,2 tons instead of 111,63 tons in 2012.

Figure 10

Effect on the atmosphere by the use of refrigerants (tn CO₂e)



At WIND, since years ago, we have begun the adaptation process and we have already replaced or properly converted hundreds of air conditioning units.

Table 6

Weight (kg) of packaging per 1000 product items

	Paper	Plastic	Wood
2012	10,25	1,50	0,15
2013	12,91	1,75	0,12

¹³ The Stores chain is not included

9.3.2

We focus on paper reduction

In order to eliminate the use of paper in the procedures of our Company, we invest in technology. Thus, we continued in 2013 the implementation of paper reduction projects. Due to the totality of our projects we implemented in 2013, we estimated that **approximately 115 tons of papers are saved per year.**

The most important of these projects was the **reduction of the number of pages of our bills** with the appropriate redesign. From this action, 13.000.000 paper sheets are saved per year or about 70 tons. **This amount is equal to 28.000 packs of A4 paper.**

At the same time, users who use the online **account management** service (e-bill) are constantly increasing. In 2013, we recorded a significant increase of the users of this service. The vast majority has chosen to have the minimum level of charges of their bill printed (only the first page) or not to be printed at all, which saves an amount of about 16 tons per year, increased by 27% approximately compared to 2012.

In addition, by **installing thermal printers** in WIND chain stores and increasing the number of documents that are printed by thermal printers instead of simple printers, the paper surface needed for a document/transaction to be printed and therefore the total amount of documents for the same number of prints is significantly reduced. Furthermore, these printers do not use any other consumables except paper, which eliminates the generation of waste ink cartridges and toners.

We estimate that up to one extra ton of paper is saved from adding new transaction documents to the program.



9.4

Waste Production and Management

The waste produced due to our operations are collected, separated and recycled, or whenever this is not possible for technical reasons, they are disposed for land filling. The main categories of produced waste 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 (94%) is made by disposal to licensed recycling and decontamination facilities, through a network of partners or/and relevant collective management systems.

Table 7

Partnered Collective Waste Management Systems

Collective System	Waste Type
	A.F.I.S. Recycling of Portable Power Poles Small household type batteries
	Appliance Recycling S.A. All types of electrical and electronic equipment
	SY.DE.SYS Alternative Management System of Accumulators Industrial type batteries, accumulators
	E.P.EN.DI.SYS Company of Alternative Management of Batteries Nationwide Industrial type batteries, accumulators
	Fotokyklosi Lighting equipments, light bulbs, luminaires
	EEAA Hellenic Recovery Recycling Corporation S.A. All kinds of product packaging



Specifically, the electrical/electronic equipment and sometimes the accumulators are thoroughly checked in case they can be re-used before they are categorized as waste, either within the company, or as used equipment on sale to third parties. In many cases, hardware and other items (desks, chairs, etc.) are donated to schools, local authorities, NGOs, etc. That way, we implement the “Reduction – Re-use – Recycle” triptych according to the principles of sound management of waste materials, which we apply through our Environmental Management System.

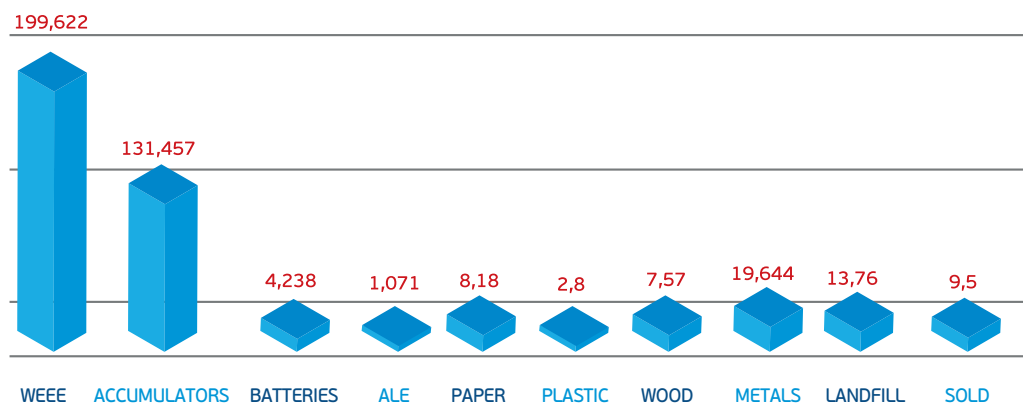
In 2013, we recorded 393,61 tons of waste¹⁴, of which about 340 tons belong to the categories of accumulators/batteries and waste electrical and electronic equipment (WEEE). Overall, 133tons of waste were classified as hazardous waste and 261 tons as non-hazardous. There was a very large **increase in the amount of electrical and electronic waste and the quantity of accumulators, as a result of the third consecutive year with major infrastructure upgrade projects in progress**. In 2013, there were no exports of waste to be managed in other countries.

¹⁴ The Stores chain is not included



Figure 11

Waste production 2013 (tn)



The total amount of waste requiring special management amounted to 133 tons and the non-hazardous to 261 tons. Non-hazardous category includes the electrical and electronic equipment that, according to the classification of the European Waste Catalogue, is not characterized as hazardous waste, although it still requires special handling, decontamination and recycling.

Figure 12

WASTE PRODUCTION MANAGEMENT 2013 (tn)

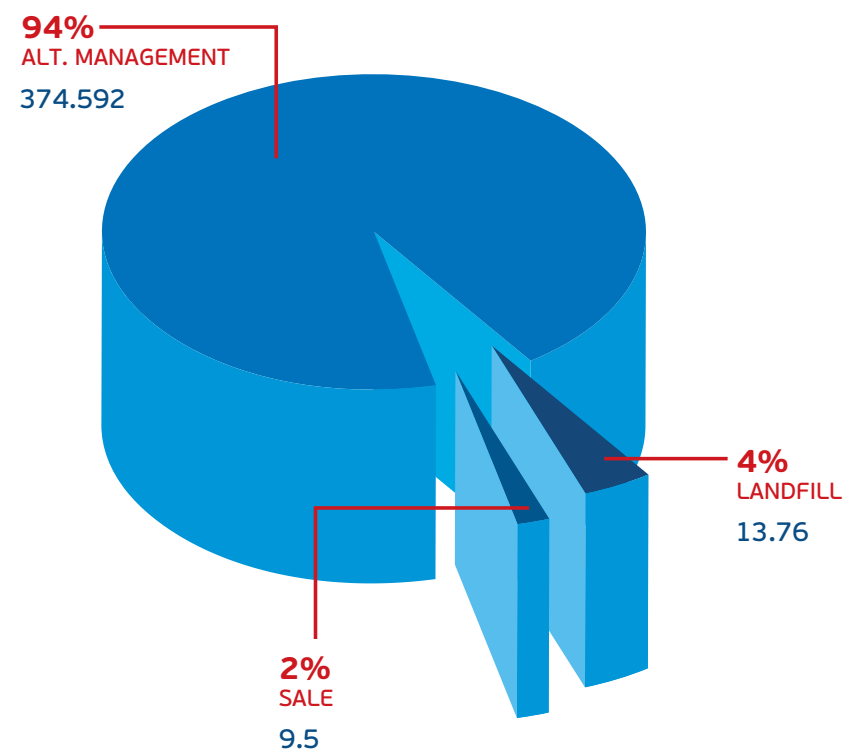
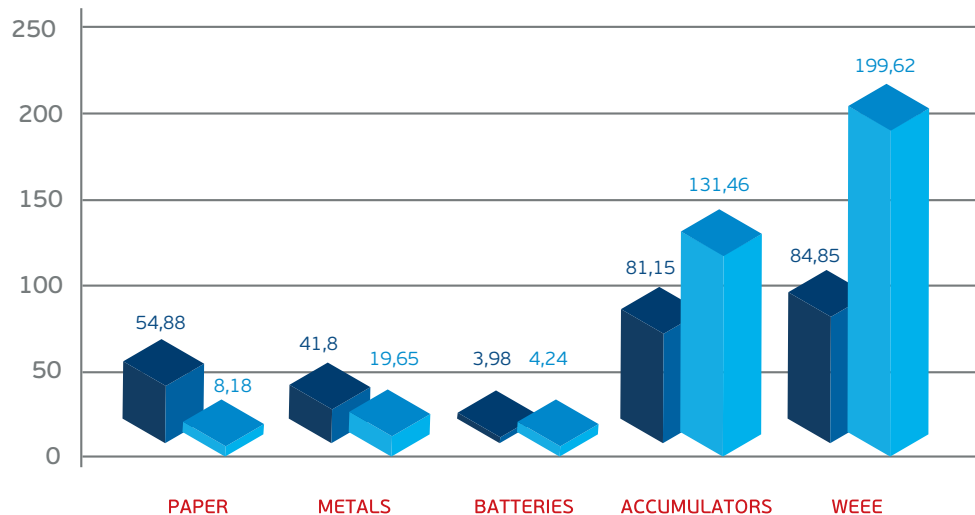


Figure 13

Waste Production 2012-2013 (tn)

Alternative Waste Management /
Significant Categories 2012-2013 (tn)

2013
2012



Water Management

Water consumption is recorded only for the major facilities, which account for more than 90% of our personnel. Water consumption is limited to **serving personnel at the building (hygiene, cleaning)** and **watering the gardens** around the premises. Accordingly, water waste is generated from the above uses and passes entirely to the urban/ domestic waste network powered by EYDAP. We estimate that about 75% of the amount is used in buildings – and not in garden watering – and ends up as waste to the sewage network. With this assumption, in 2013, the amount of wastewater **reached 6.516 cubic meters** or 6,3 cubic meters per employee.

In 2013, the recorded water consumption at our facilities amounted to 13.776 cubic meters ¹⁵.

¹⁵ The rate of water consumption was increased by 33%.

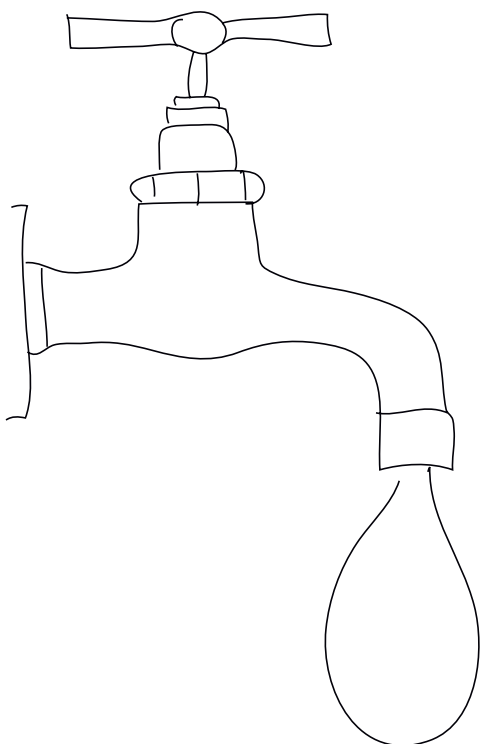
The increase was due to a damaged EYDAP meter, which was restored.

Table 8 ¹⁶

Water consumption in major buildings

	2013	2012	2011
m3 without garden watering	9.583	9.469	9.035
m3/per employee	9,29	9,26	7,55

¹⁶ For comparability reasons, water consumption is presented without the water used for watering the gardens



9.6

Biodiversity Impact & Management

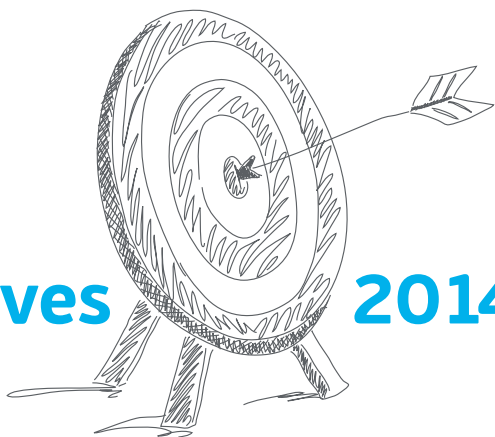
It is inevitable that a number of mobile and fixed telephony Stations of the Company are located within designated protected areas. We estimate that approximately 11,760 square meters of land are occupied in 43 prefectures in the country. ¹⁷ The specific identification numbers of the classified area of each station can be found in Appendix A of this report, while more information about these areas can be found on the official web pages of the Ministry of the Environment, Energy, and Climate Change. ¹⁸

Telecommunications don't affect significantly the biodiversity of an area. Probably the primary impact on protected areas remains the **emission of energy in the form of electromagnetic radiation**. For this reason, we elaborate environmental impact studies for every large station (class A) that is installed and which is expected to have potential environmental impacts as well as specialized studies of radio emissions and onsite measurements with special instruments by accredited measurement laboratories. The impacts that are not associated with electromagnetic radiation are the emissions caused by the operation of the electricity generation set, opening roads when required, and staff transportation from and to the station. Smaller stations are manufactured according to statutory environmental standards (Standard Environmental Commitments).

¹⁷ Approach. Calculations with 70 sqm per station, last count 2007

¹⁸ <http://www.ypeka.gr/Default.aspx?tabid=432&language=el-GR>

Objectives 2014



✓ Reduction of Energy Consumption:

- ④ Reduction of the total energy consumption by 10.000GJ of all projects, eg:
 - Building Engineering interventions and improvements to buildings and telecommunication stations and mobile telephony and the use of power generators
 - Improve the consumption monitoring
 - Replace telecommunications and IT equipment with new, of reduced power
- ④ routing of a bus for the connection of metro stations with our most populated building, in order to promote the use of public transportation by the employees.

✓ Greenhouse Gas Emissions:

- ④ Preparing to replace HCFCs in air conditioners until the end of 2014.

✓ Raw Materials Use:

- ④ elimination of printed employees payrolls and substitution with an e-document, in order to save about 2.250 paper sheets or about 137 kg of paper
- ④ elimination of the use of printed materials in the Company's procurement procedures and the use and exchange of electronic documents, when possible
- ④ implementation of digitized procedures, such as the use of digital signature, at the stores outside WIND chain as well.

10.

**Objectives
& Results
2013**

Objective 2013	Result
CORPORATE RESPONSIBILITY	
The publication of our seventh in orders Report and the external data assurance on important issues for the Company, according to GRI.	✓
Further development of the dialogue with our stakeholders, in particular with our suppliers.	✓
Participation in events that promote responsible entrepreneurship and Sustainable Development throughout the year.	✓
Transfer of data and figures of the Report into the digital platform by creating an interactive module for our stakeholders, in order to provide them a constant flow of information.	In progress
Expansion of the external verification of the Report on additional indexes.	✓
CORPORATE GOVERNANCE	
Completion of the Business Continuity project to ensure the integrity of the Fixed Telephony and Internet network, as well as tests of efficiency of the Recovery Plans	In progress
Implementation of additional policies that provide for the avoidance of conflict of interests and operations to prevent fraud and corruption within the requirements of the Code of Conduct.	✓
Detailed information and communication of the content of the Code of Conduct within the Organization.	✓
Continuous simplification of our procedures, enhancing the practical involvement of all our employees to facilitate our everyday life and focusing our resources into productive investment, and operations that make the difference to the customer.	✓

Objective 2013	Result
EMPLOYEES	
Developing WIND Running Team while also promoting the concept of corporate sports teams through the active participation of our employees, team spirit and volunteerism through sports.	✓
The further strengthening of the concept of internal volunteerism by informing our people and actively participating in voluntary environmental actions and social responsibility activities.	✓
Providing continuous update on health and safety issues by promoting activities that contribute to the prevention of health care issues for our employees and their families through the provision of special preventative medical examinations to employees and their families, either for free or at special rates.	✓
Strengthening our Employees' Blood Bank.	✓
Strengthening open internal communication between all the hierarchical levels of the company. Redesigning the employee Evaluation Process.	✓
Designing and implementing employee development tools based on the axis of 360o feedback.	✓
Further developing the e-magazine WIND Eco News as a source of information about the environment in order to encourage employees' active participation in its protection.	✓
<p>Further improving Health and Safety conditions through:</p> <ul style="list-style-type: none"> • continuously monitoring the microclimate conditions of our offices: we plan to repeat the measurements of temperature, humidity, lighting and ventilation in order to ensure the best possible working conditions. • monitoring the quality of water consumed by our employees, by performing relevant measurements/analyzes in the facilities of our Company. • continuing provision of appropriate personal protection equipment for our employees – technicians. • updating all medical health records and designing a new efficient management / monitoring process of individual health records. 	In progress

Objective 2013	Result
SOCIETY	
Completing the dispatch of hardware to more than 20 schools and institutions.	✓
Conducting 5 and 10 km Road Races in at least 7 cities across the region.	✓
Increasing participation in WIND Running Team by 100%	In progress
Increasing the amount offered to NGOs through WIND Running Team-We run for a good cause up to 25%	✓
Developing partnerships and organize events for further penetration of the kids@safety: internet, mobile phone and child informational campaign.	✓
Supporting at least 10 NGOs through actions of social solidarity.	✓
Informing and awake the public about the protection of stray animals, in collaboration with relevant programs..	✓

Objective 2013	Result
MARKET	
Investing in the creation of simple and comprehensive services in fixed telephony and Internet for everyone at competitive prices.	In progress
Improving customer experience on matters relating the service they receive through our retail network and our customer service department, their account, the ways they communicate with the company, as well as other issues that can improve and establish their trust and make them stay to our network.	✓
Providing an online application to the end user that will give him access to useful information about connections and his account, and their management.	✓
Providing Mobile, Fixed Telephony and Internet services in new areas with a plan to cover 6 new cities.	In progress
Providing VDSL for high-speed access to the Internet (up to 50 Mbps), aiming to cover 60% in the first semester of 2013.	✓
Adopting a new even more comprehensive research model for auditing subscribers satisfaction taking into account the opinion of more than 15.000 subscribers per year and identifying points for improving the procedures in more than 20 different touch points with the company.	✓
Creating a unified automated system that collects questions, clarification needs, even customer complaints, from every channel (call centers, social media, retail stores, surveys, letters, etc.), into a unified internal information tool so that a qualified task force for immediate resolution of any issue.	✓
Organizing 3 training programs on self-regulation rules of SEE's Code of Conduct for all our employees in the communication department, aiming to an ever more rigorous self-compliance with the Code in 2013.	In progress
Developing and providing advanced and user-friendly applications for smartphones, which will offer all Mobile Telephony customers the optimum account management experience immediately and simply.	✓
Increasing by 10% the amount allocated to research project in order to thoroughly investigate customer needs and their level of satisfaction from the provided services.	✓
Repeating the WIND stores customer satisfaction survey, both to give the opportunity to our partners to evaluate our services and to collect proposals for continuous improvement and additional ideas that make a difference to the customer.	✓

Objective 2013	Result
ENVIRONMENT	
Reducing paper consumption by 7.000.000 sheets or 35.000 kg.	✓
Saving extra 4.000 GJ of the total energy consumption on the Fixed and Mobile Telephony Stations, compared to 2012.	Accomplished on total, not per project.
Saving extra 15.000 GJ of energy by completing the installation of hybrid energy production systems at Base Stations.	✓
Restoring energy consumption of the headquarters of the Company in Kifissias Avenue at the levels of 2011.	✓
Replacing 35 corporate vehicles with new technology models, which are more economic in consumption.	✓

11.

Glossary

Base Station: Fixed locations of the mobile telephony network, through which data and information reception and transmission take place, so that network coverage is expanded and also shared with hierarchically lower networks.

Business Cloud: It concerns cases where there services and data concerning the customer – user, are stored on computers located in data centers outside his area and his infrastructure.

Core Network: The central and hierarchically higher part of a telecommunications network through which various individual networks are connected, securing geographical coverage.

EETT: The National Telecommunications and Post Commission of Greece, which is an Independent Authority that controls, regulates and supervises the electronic communications and postal services.

Extranet: A network of computers and data, which is fully or partially accessible for a specific purpose or use from points outside that network. Frequently the term is also used for the companies' portal which is accessible by associates, sales network, etc.

Fibre Optics: High tech telecommunications cables through which data transmission is carried out in the light spectrum frequencies, ensuring very high speed of transmission, low level signal attenuation and very high level of protection from interference. The operation of the optical fibre is based on light refraction within the fibre.

Gbps: Measurement unit of the rate of data transmission (Gigabit per second).

GR-IX: High-speed connection (Greek Internet Exchange) between Internet Service Providers operating in Greece, through which their traffic is directly exchanged, resulting in faster service to Internet users.

Multimedia Information System: Electronic communications services that pertain to the transmission of information/content in electronic communication networks, whose pricing is done by charging calls to numbering resources of the National Numbering Plan, particularly the 901, 909, 14, 190-195 and 54 series (e.g. SMS, MMS, Audiotext, Videotext and other services).

RoHS: A standard which sets the limit to the quantity of metals and substances, in general, used for the manufacture of electronic devices in order to reduce their impact on the environment.

Specific Absorption Rate (SAR): A measure of the rate at which energy is absorbed by the human body when this is exposed to electromagnetic fields (e.g. mobile phone field). SAR is measured in a specific manner and there are acceptable safety limits.

VDSL: It is the most modern version of DSL technology, offering much higher access speeds to the Internet (download and upload) compared to ADSL. In Greece there are commercially available VDSL products with speeds up to 50Mbps.

12.

Appendix A

Protected Areas

Perfecture	Characterized Area Code
AITOLOAKARNANIA	GR2310001, GR2310005, GR2310010, GR2310012, GR2310015
ARGOLIDA	GR2510003
ARKADIA	GR2520001, GR2520006
ATTICA	GR2530005, GR3000001, GR3000005, GR3000006, GR3000008, GR3000012, GR3000013
AHAIA	GR2320001, GR2320002, GR2320004
GREVENA	GR1310001
DRAMA	GR1140004
DODECANESE	GR4210003, GR4210004, GR4210005, GR4210006, GR4210008, GR4210010, GR4210015, GR4210024
EVROS	GR1110002, GR1110004, GR1110005, GR1110008, GR1110009
EVOIA	GR2420001, GR2420008
EVKITANIA	GR2430001
ILIA	GR2330002
IMATHIA	GR1210001, GR1210002
HERAKLION	GR4310002, GR4310004, GR4310005, GR4310008, GR4310010
THESPROTIA	GR2120009
THESSALONIKI	GR1220002, GR1220003, GR1220010
IOANNINA	GR2130001, GR2130004, GR2130006, GR2130007, GR2130008, GR2130010
KAVALA	GR1150010
CORFU	GR2230004
KEFALLINIA	GR2220001, GR2220002
KILKIS	GR1220002
CORINTH	GR2530001, GR2530004, GR2530005
CYCLADES	GR4220003, GR4220004, GR4220009, GR4220011, GR4220012, GR4220014, GR4220020, GR4220024
LAKONIA	GR2540001, GR2540003, GR2550006, GR2540007, GR2550009,
LARISSA	GR1420001, GR1420004, GR1420005, GR1420006, GR1420007, GR1420008
LASSITHI	GR4320002, GR4320005, GR4320006, GR4320009, GR4320010
LESVOS	GR4110001, GR4110002, GR4110003, GR4110005
MAGNISIA	GR1430001, GR1430004
MESSINIA	GR2550003, GR2550006, GR2550009
XANTHI	GR1120005
PELLA	GR1240002, GR1240004
PIERIA	GR1250001
RETHYMNO	GR4330004, GR4330005, GR4330007, GR4330009, GR4330012, GR4330019
RODOPI	GR1130011
SAMOS	GR4120003, GR4120004, GR4120005, GR4120006
SERRES	GR1150005, GR1260001, GR1260004, GR1260008, GR1260009, GR1260010
TRIKALA	GR1440001, GR1440002, GR1440003, GR1440005
FTHIOTIDA	GR2450005
FLORINA	GR1240001, GR1340001
FOKIDA	GR2450001, GR2450002, GR2450004
CHALKIDIKI	GR1270001, GR1270002, GR1270003, GR1270005, GR1270012
CHANIA	GR4340004, GR4340008, GR4340013
CHIOS	GR4130001

13.

About the Report



At WIND Hellas, we understand the interest of our groups of stakeholders for regular update with respect to our performance regarding the Economy, Society and the Environment and we try to satisfy their interest by providing comprehensive and correct information.

We always try to provide information about our operations in the Telecommunications sector, taking into account stakeholders' comments that we have received. We welcome the increased interest shown by a greater part of the public on our impact on Sustainability Issues, which we noted from the evaluation of our Report by its readers and from the visitors to our website. Thus, with this edition, we strive in practice to improve our channels of communication with our stakeholders.

The present Sustainability Report of WIND Hellas constitutes the seventh annual edition of such a Report and the sixth based on the Global Reporting Initiative standard. This Report covers our Company's activity for the year starting 1 January and ending 31 December 2013, in Greece. The seat and central offices of WIND Hellas are located in Athens, at 66 Kifissias Ave Maroussi, whilst we also have offices in Thessaloniki, Patras, Larissa and Heraklion.

In order to determine and develop the content of the present Report, as was also the case in previous years, we took into account the Company's type of activity, the Principles of Sustainable Development, as set out in the UN Global Compact Standard and the G3.1 edition of the Global Reporting Initiative guidelines, which constitute the framework for controlling our environmental, economic and social impact.

In this framework, the present edition develops the following axes:

- Our Corporate Responsibility strategy, which is expressed via our program "In Action", through our approach to our stakeholders
- Our Responsible Enterprnership based on the pillars of corporate governance, market, employees, environment and society, which are reflected in the present document according to how these were prioritized in the context of the materiality analysis.



This year, for the first time we ensured the accuracy of the allegations of the content of this Report by an independent external partner, TUV HELLAS, for the chapters of Health & Safety and Environment. At the same time, we examined the application level according to the GRI G3.1 standard for conformity assessment.

However, we are aware of the restrictions that existed when drafting the present report, such as the lack of measurable targets for each program or action, and we will try to overcome them in the future.

In this document, you can find the GRI Index, the External Verification Report Data and the Application Level Statement in accordance with the requirements of GRI. (see p. 132)

Indicators & Data Collection

The Company's Corporate Responsibility Committee is responsible for collecting data and for the reliability and clarity of the information. This Committee comprises representatives of the Company's main departments and is competent for compiling the Report through collective interdepartmental work.

The collection of data for the specific Report was carried out as follows:

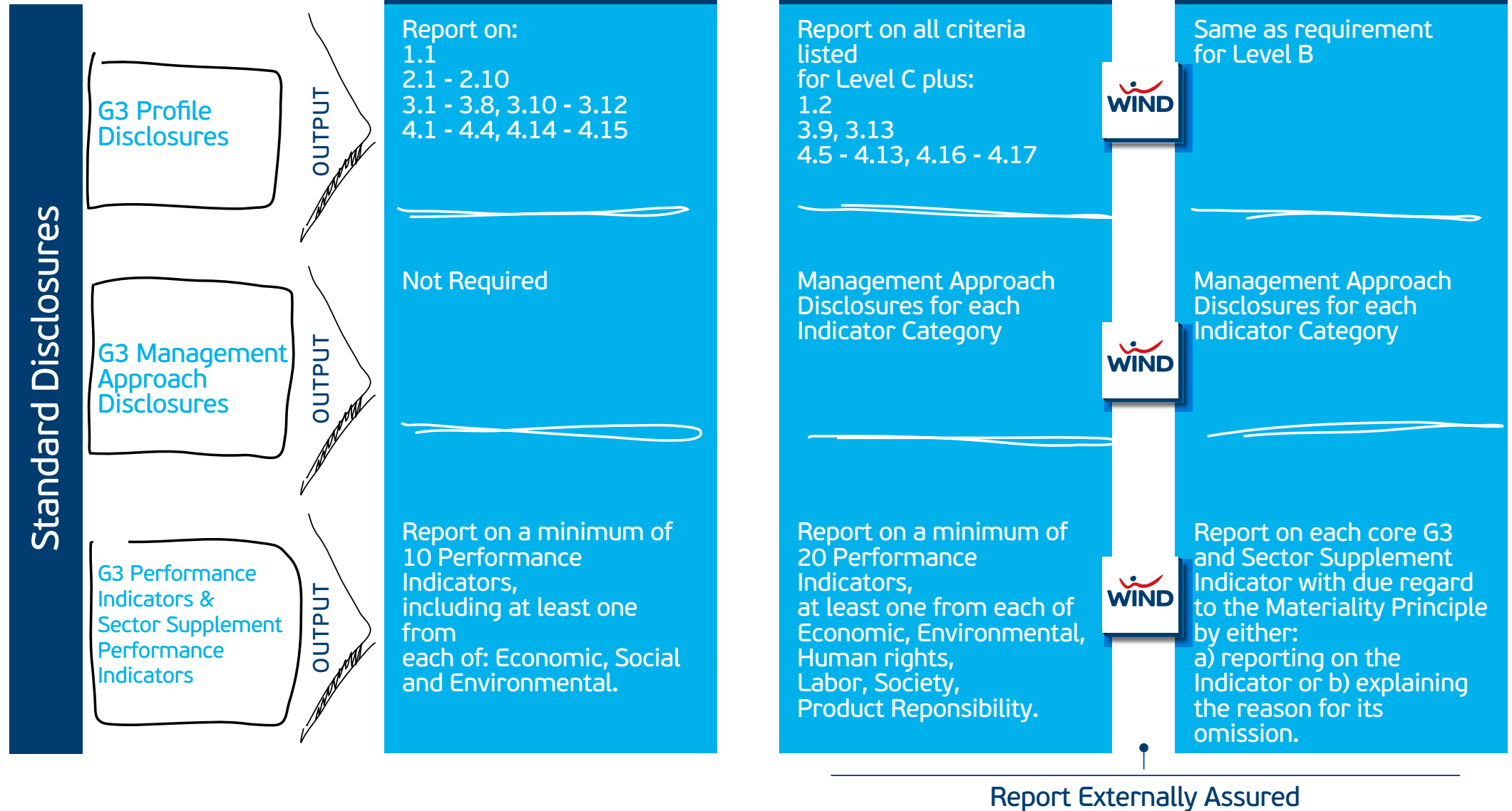
- performance data on our environmental operations from internal recording, control and verification procedures, according the ISO 14001 international standard which was used for our Company's certification, whilst wherever an estimate is included it is mentioned accordingly.
- data on our social impact were based on official records, surveys and data on quality, health & safety, human resources.
- our financial data were taken from the financial department and are in accordance with our annual financial results.

Verification of Data of the Report

Selected Company performance data on Corporate Responsibility issues are also confirmed by the actions carried out each year by the Internal Audit Department, which verifies that the data cited in the Sustainability Report is correct.

Application Level Table

Report Application Level



14.

UN Global Compact: Communication on Progress

WIND Hellas supports the 10 principles of United Nations Global Compact regarding human rights, labour practices, environmental protection and fight corruption. With intent to actively support and develop these principles in our sphere of influence, 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, customers and the general public. Focusing on monitoring and transparency, we report our progress in the various axes to all our stakeholders.

Index of Global Compact		
Principle		Reference (paragraph in the Report)
Human Rights		
Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights	4, 4.1, 4.2, 4.3, 8.5, 8.7.2, 8.8, 8.10, 6, 6.2, 6.3, 6.5, 9.2.4, 9.6
Principle 2	Business should make sure that they are not complicit in human rights abuses	8.10, 6.2, 6.4, 6.6.1
Labour Conditions		
Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	8.10, 6.3,6.4
Principle 4	Businesses should uphold the elimination of all forms of compulsory labour	8.10, 6.1, 6.2
Principle 5	Businesses should uphold the effective abolition of child labour	8.10, 6.2
Principle 6	Businesses should uphold the elimination of discrimination in respect of employment and occupation	8.10,6.1,6.2,6.6.2
Environment		
Principle 7	Businesses should support a precautionary approach to environmental challenges	4.1.2, 4.3, 5.1, 5.5.2, 9.1
Principle 8	Businesses should undertake initiatives to promote greater environmental responsibility	8.5, 8.10, 6.7, 9.3, 7.3
Principle 9	Businesses should encourage the development and diffusion of environmentally friendly technologies	8.1, 8.5.1, 9.2.1,9.2.2
Anti-corruption		
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery	5.2, 5.3, 5.4, 8.7, 8.7.2, 8.10

Index of Global Compact Principles

Principle		Reference (paragraph in the Report)
Human Rights		
Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights	4, 4.1, 4.2, 4.3, 6.3, 6.7, 7, 7.2, 7.3, 7.5, 8.3.2.1, 8.7
Principle 2	Business should make sure that they are not complicit in human rights abuses	6.11, 7.2, 7.4, 7.6
Labour Practices		
Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	6.11, 7.3
Principle 4	Businesses should uphold the elimination of all forms of forced and compulsory labour	6.11, 7.1, 7.2
Principle 5	Businesses should uphold the effective abolition of child labour	6.11, 7.2
Principle 6	Businesses should uphold the elimination of discrimination in respect of employment and occupation	6.11, 7.1, 7.2, 7.6
Environment		
Principle 7	Businesses should support a precautionary approach to environmental challenges	4.1.2, 4.3, 5.1, 5.5, 8.1, 8.2
Principle 8	Businesses should undertake initiatives to promote greater environmental responsibility	6.3, 6.5, 6.11, 7.7.1, 8.4, 8.5.1, 9.5
Principle 9	Businesses should encourage the development and diffusion of environmentally friendly technologies	6.1, 6.5, 8.3.1.1, 8.3.1.2, 8.3.2.1
Anti-Corruption		
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery	5.2, 5.3, 5.4, 6.7.2, 6.7.3, 6.11, 7.7

15.

GRI Index & Assessments

GRI Content Index

Profile Disclosure	Description	Reported	Cross-reference/Direct answer
Profile Disclosures			
1. Strategy and Analysis			
1.1	Statement from the most senior decision-maker of the organization.	▢	1. Message from the Chairman of the Board & CEO
1.2	Description of key impacts, risks, and opportunities.	▢	1. Message from the Chairman of the Board & CEO / 2. 2013 what we accomplished / 3. WIND Hellas Communication for All / 4.3 We approach important issues with responsibility / 5.5 Procedures, Management Systems and certifications / 9.1 We consistently manage environmental issues / 9.2 Climate, Energy and Energy Management / 10. Objectives & Results 2013
2. Organizational Profile			
2.1	Name of the organization.	▢	13 About the Report
2.2	Primary brands, products, and/or services.	▢	8.3 Communication for All / 8.4 Responsible Services / 8.5.1 "Green Product" / 8.6 Social Product
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	▢	4.1.1 The Governance Structure of Our Corporate Responsibility / 5.2 Management Practice
2.4	Location of organization's headquarters.	▢	13. About the Report
2.5	Number of countries where the organization operates.	▢	3. WIND Hellas Communication for All / 13. About the Report
2.6	Nature of ownership and legal form.	▢	3.1 Financial Growth & Feature Figures
2.7	Markets served.	▢	3. WIND Hellas Communication for All / 8.10.1 Local Suppliers
2.8	Scale of the reporting organization.	▢	3.1 Financial Growth & Feature Figures / 6.1 Human Resources Data / 8.3 Communication for All / 8.10.1 Local Suppliers
2.9	Significant changes during the reporting period.	▢	1. Message from the Chairman of the Board & CEO / 2. 2013 What we accomplished / 3.1 Financial Growth & Feature Figures
2.10	Awards received in the reporting period.	▢	3.4 Recognition

Core Indicator: ▢ Additional Indicator: ■Fully Reported: ▢Partially Reported: ■Not Reported: ▢

3.1	Reporting period for information provided.	⏏	13 About the Report
3.2	Date of most recent previous report.	⏏	13 About the Report
3.3	Reporting cycle.	⏏	13 About the Report
3.4	Contact point for questions regarding the report or its contents.	⏏	Page 142
3.5	Process for defining report content.	⏏	4.1.2 Our Corporate Responsibility Strategy/ 4.2.1 Dialogue with Stakeholders / 4.3 We approach Important Issues with Responsibility / 13. About the Report
3.6	Boundary of the report.	⏏	13 About the Report
3.7	State any specific limitations on the scope or boundary of the report.	⏏	13 About the Report
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	⏏	There are no joint ventures or other entities that affect comparability
3.9	Data measurement techniques and the bases of calculations.	⏏	13. About the Report / 9. Environment
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement.	⏏	3.1 Feature Figures
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	⏏	13. About the Report / There are no significant changes
3.12	Table identifying the location of the Standard Disclosures in the report.	⏏	15. GRI Indexes & Certifications
3.13	Policy and current practice with regard to seeking external assurance for the report.	⏏	13. About the Report / 15. GRI Indexes & Certifications
4. Governance, Commitments, and Engagement			
4.1	Governance structure of the organization.	⏏	4.1.1 The Governance Structure of Our Corporate Responsibility / 5.2 Management Practice
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	⏏	5.2 Management Practice
4.3	For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.	⏏	5.2 Management Practice
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	⏏	4.2.1 Dialogue with Stakeholders / 5.2 Management Practice

4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives and the organization's performance.	▢	5.2 Management Practice
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	▢	5.2 Management Practice / 5.3 Internal Audit
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees.	▢	5.2 Management Practice
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	▢	5.1 Responsible Management / 5.4 Conflict of Interests - Tackling Corruption / 6.2 Human Rights & Equal Opportunities / 8.7 Responsible Marketing / 8.8 Intellectual Property Rights and Communication Privacy
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance.	▢	5.2 Management Practice / 5.3 Internal Audit / 5.5 Procedures, Management Systems and Certifications
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	▢	5.3 Internal Audit
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	▢	5.3 Internal Audit / 5.5.3 Business Continuity Management
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	▢	3.3 Participation / 4.2.1 Dialogue with Stakeholders / 8.2 H/M Radiation / 8.5 Responsible Products / 8.7 Responsible Marketing / 8.7.3 Code of Conducts / 9.4 Waste Production and Management / 14. UN Global Compact: Communication on Progress
4.13	Memberships in associations.	▢	3.3 Participation
4.14	List of stakeholder groups engaged by the organization.	▢	4.2 Our Stakeholders
4.15	Basis for identification and selection of stakeholders with whom to engage.	▢	4.2 Our Stakeholders / 4.2.1 Dialogue with Stakeholders
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	▢	4.2.1 Dialogue with Stakeholders / 4.4. We promote Responsible Entrepreneurship & Technological Innovation / 5.2 Management Practice / 6.7 Internal Communication / 7.1 We contribute to Society / 8.9.1 Measurements & Evaluation / 8.10 Responsible Suppliers
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	▢	4.2.1 Dialogue with Stakeholders / 4.3 We approach Important Issues with Responsibility / 6.7 Internal Communication / 8.2 Electromagnetic Radiation / 8.4.3 Informing the Public / 8.5.1 "Green Product" / 8.6 Social Product / 8.9.2 Response & Redesign

Disclosures on Management Approach			
ECONOMY			
Aspects	Economic performance	▢	1. Message from the Chairman of the Board & CEO / 3. WIND Hellas Communication for All / 3.1. Financial Growth & Feature Figures / 10. Objectives & Results 2013
	Market presence	▢	1. Message from the Chairman of the Board & CEO / 8. Market / 8.1 Telecommunication Network / 8.3 Communication for All / 8.5 Responsible Products / 8.6 Social Product / 8.10 Responsible Suppliers
	Indirect economic impacts	▢	3.1 Financial Growth & Feature Figures / 8.6 Social Product / 8.10.1 Local suppliers / 6.1 Human Resources Data / 6.4. Employment Conditions & Additional Benefits / 9.1 We consistently manage environmental issues
ENVIRONMENT			
Aspects	Materials	▢	9.1 We consistently manage environmental issues / 9.3 Raw Materials Usage
	Energy	▢	9.1 We consistently manage environmental issues / 9.2 Climate, Energy and Energy Management
	Water	▢	9.5 Water Management
	Biodiversity	■	9.6 Biodiversity Impact & Management
	Emissions, effluents and waste	▢	9.1 We consistently manage environmental issues / 9.2 Climate, Energy and Energy Management / 9.4 Waste Production and Management
	Products and services	▢	8.5 Responsible Products
	Compliance	▢	9.1 We consistently manage environmental issues
	Transport	▢	9.1 We consistently manage environmental issues / 9.2.3 Vehicle Fleet
	Overall	▢	5.5.2 Management Systems / 9. Environment / 9.1 We consistently manage environmental issues / 9.2 Climate, Energy and Energy Management / 9.6 Biodiversity Impact & Management
LABOUR PRACTICE			
Aspects	Employment	▢	6. Employees / 6.1 Human Resources Data / 6.2 Human Rights & Equal Opportunities
	Labor/management relations	▢	5.2 Management Practice / 6. Employees / 6.3 Freedom of Association / 6.4 Employment Conditions & Additional Benefits / 6.7 Internal Communication
	Occupational health and safety	▢	6.5 Employee Health & Safety
	Training and education	▢	6.6 Employee Growth & Development
	Diversity and equal opportunity	▢	6. 2 Human Rights & Equal Opportunities / 6.6 Employee Growth & Development
	Equal remuneration for women and men	☒	

HUMAN RIGHTS			
Aspects	Investment and procurement practices	▮	3.1 Financial Growth & Feature Figures / 8.10 Responsible Suppliers
	Non-discrimination	▮	6. Employees / 6.2 Human Rights & Equal Opportunities / 8.10 Responsible Suppliers
	Freedom of association and collective bargaining	▮	6.3 Freedom of Association
	Child labor	▮	6.2 Human Rights & Equal Opportunities
	Prevention of forced and compulsory labor	▮	6.2 Human Rights & Equal Opportunities
	Security practices	▮	6.5 Employee Health & Safety
	Indigenous rights	☒	
	Assessment	▮	6.2 Human Rights & Equal Opportunities
	Remediation	▮	6.2 Human Rights & Equal Opportunities
SOCIETY			
Aspects	Local communities	▮	1. Message from the Chairman of the Board & CEO / 3.1 Financial Growth & Feature Figures / 4.3. We approach important issues with responsibility / 6.1 Human Resource Data / 7. Society / 8.6. Social Product / 8.10.1 Local Suppliers
	Corruption	▮	5. Corporate Governance / 5.2. Management Practice / 5.3. Internal Audit / 5.4. Conflict of Interests - Tackling Corruption
	Public policy	☒	
	Anti-competitive behavior	▮	8.7 Responsible Marketing / 8.7.2 Fair Competition
	Compliance	▮	8.7.2 Fair Competition
PRODUCT RESPONSIBILITY			
Aspects	Customer health and safety	■	5.5 Procedures, Management Systems and Certifications / 8.2 Electromagnetic radiation / 8.5. Responsible Products
	Product and service labelling	▮	8.3 Communication for All / 8.5 Responsible Products
	Marketing communications	▮	8.7 Responsible Marketing
	Customer privacy	▮	8.8 Intellectual Property Rights and Communication Privacy
	Compliance	▮	8.7 Responsible Marketing / 8.7.1 Communication Principles

Core Indicator: ■ Additional Indicator: ■

Fully Reported: ▮

Partially Reported: ■

Not Reported: ☒

Performance Indicators			
Economic			
EC1	Direct economic value generated and distributed	□	3.1. Financial Growth & Feature Figures. Additional Costs: operational costs 443,636 K, employees remunerations 48,368 K, investments 623K
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	■	1. Message form the Chairman of the Board & CEO / 9.1 We consistently manage environmental issues / 9.2 Climate, Energy and Energy Management
EC3	Coverage of the organization's defined benefit plan obligations	☒	
EC4	Significant financial assistance received from government.	☒	
EC5	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	☒	
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	■	8.10.1 Local Suppliers
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	□	6.1 Human Resources Data / 6.2 Human Rights & Equal Opportunities
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	□	3. WIND Hellas Communication for All / 3.1. Financial Growth & Feature Figures / 9.1 We consistently manage environmental issues / 9.2 Climate, Energy and Energy Management
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	■	6.1. Human Resources Data / 6.2. Human Rights & Equal Opportunities / 8.6. Social Product / 8.10.1. Local suppliers
Environmental			
EN1	Materials used by weight or volume.	□	9.3 Raw Materials Usage
EN2	Percentage of materials used that are recycled input materials.	□	9.3 Raw Materials Usage
EN3	Direct energy consumption by primary energy source.	□	9.2 Climate, Energy and Energy Management
EN4	Indirect energy consumption by primary source.	□	9.2 Climate, Energy and Energy Management
EN5	Energy saved due to conservation and efficiency improvements.	□	9.2 Climate, Energy and Energy Management
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	□	9.2 Climate, Energy and Energy Management
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	□	9.2 Climate, Energy and Energy Management
EN8	Total water withdrawal by source.	□	9.5 Water Management
EN9	Water sources significantly affected by withdrawal of water.	□	No water sources are significantly affected since the only water used is for servicing offices and watering gardens.
EN10	Percentage and total volume of water recycled and reused.	□	Water is used only for servicing office employees. No water is recycled or re-used.

Core Indicator: Additional Indicator:

Fully Reported: ■

Partially Reported: ☒

Not Reported: □

EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	■	9.6 Biodiversity Impact & Management / 12. Appendix A / Actual site size not available, information on sites adjacent to protected areas not available. Natura area data provided for year 2007.
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	□	9.6 Biodiversity Impact & Management / Environmental Impact Assessments composed for every site inside or outside of protected areas describe per site all impacts identified. In summary, there are no significant impacts for biodiversity.
EN13	Habitats protected or restored.	□	None. Biodiversity impact not significant.
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	□	There are no significant impacts to biodiversity. Despite that fact, all Radio Base Stations located at sensitive areas are examined for environmental impacts.
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	□	9.6 Biodiversity Impact & Management / No such area significantly affected by Wind Hellas operation. No evidence that the presence of Radio Base Stations at sensitive ecologically areas is affecting any protected species at operation phase.
EN16	Total direct and indirect greenhouse gas emissions by weight.	□	9.2 Climate, Energy and Energy Management
EN17	Other relevant indirect greenhouse gas emissions by weight.	□	9.2 Climate, Energy and Energy Management
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	□	9.2 Climate, Energy and Energy Management
EN19	Emissions of ozone-depleting substances by weight.	□	9.2.4 Greenhouse gases that harm the Ozon
EN20	NOx, SOx, and other significant air emissions by type and weight.	■	9.2 Climate, Energy and Energy Management / Vehicle related emissions are calculated as CO2e and included in relevant category. No other such emissions are relevant for WIND Hellas operations
EN21	Total water discharge by quality and destination.	□	9.5 Water Management
EN22	Total weight of waste by type and disposal method.	□	9.4 Waste Production and Management
EN23	Total number and volume of significant spills.	□	There have been no significant spills in 2013
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous.	□	9.4 Waste Production and Management / Not relevant. WIND Hellas does not transport, import or export hazardous waste itself. What hazardous waste have been transported on behalf of WIND Hellas are reported at code EN22
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	□	9.5 Water Management / Not relevant, Wind Hellas does not have a significant impact on any water bodies through discharges, runoff, or other.
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	□	9.1 We consistently manage environmental issues / 9.2 Climate, Energy and Energy Management / 9.3.2 We focus on paper reduction
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	□	9.3.1 Materials Use / Being part of the collective recycling system for packaging products and packaging, we are not responsible for reclaiming neither products nor packaging. Data from the collective recycling system does not identify origin of items, thus it is impossible to know the percentage of packaging and items actually reclaimed. Wind Hellas acts as a collection point for mobile handsets and accessories for the public, but the items collected do not originate from Wind Hellas alone, but from all retailers of such equipment.
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	□	9.1 We consistently manage environmental issues

EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	▮	9.1 We consistently manage environmental issues / 9.2.3 Vehicle Fleet
EN30	Total environmental protection expenditures and investments by type.	■	9.1 We consistently manage environmental issues
Social: Labor Practices and Decent Work			
LA1	Total workforce by employment type, employment contract, and region, broken down by gender.	▮	6.1. Human Resources Data / 6.2. Human Rights & Equal Opportunities
LA2	Total number and rate of new employee hires and employee turnover by age group, gender, and region.	▮	6.1. Human Resources Data
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	▮	6.3. Freedom of Association / 6.4. Employment Conditions and Additional Benefits
LA4	Percentage of employees covered by collective bargaining agreements.	☒	
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	☒	
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	☒	
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender.	▮	6.5.1. Indices of injuries, professional sicknesses, loss of working days and absenteeism
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	▮	6.5. Employee Health & Safety / 6.5.2. Update on Health and Safety
LA9	Health and safety topics covered in formal agreements with trade unions.	▮	6.3. Freedom of Association / 6.5.2. Update on Health and Safety
LA10	Average hours of training per year per employee by gender, and by employee category.	▮	6.6.1. Training
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	▮	6.6.2 Professional Development
LA12	Percentage of employees receiving regular performance and career development reviews, by gender.	☒	
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	▮	6.1. Human Resources Data / 6.2. Human Rights & Equal Opportunities

Core Indicator: ■ Additional Indicator: ■

Fully Reported: ▮

Partially Reported: ■

Not Reported: ☒

LA14	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	☒	
LA15	Return to work and retention rates after parental leave, by gender.	■	6.5.1. Indices of injuries, professional sicknesses, loss of working days and absenteeism
Social: Human Rights			
HR1	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening.	☒	
HR2	Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken.	⏸	8.10 Responsible Suppliers
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations.	☒	
HR4	Total number of incidents of discrimination and actions taken.	⏸	6.2. Human Rights & Equal Opportunities / 8.10 Responsible Suppliers / There are no incidents of discrimination during the reported period.
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	⏸	6.3 Freedom of Association / 8.10 Responsible Suppliers
HR6	Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor.	⏸	6.2. Human Rights & Equal Opportunities / 8.10 Responsible Suppliers
HR7	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor.	⏸	6.2. Human Rights & Equal Opportunities
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	☒	
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	☒	The specific indicator are not relevant. WIND Hellas present data only for Greece.
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	☒	
HR11	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.	⏸	6.2. Human Rights & Equal Opportunities / There are no complaints submitted to the Company about the violation of human rights

Social: Society			
S01	Percentage of operations with implemented local community engagement, impact assessments, and development programs.	▢	4.3. We approach important issues with responsibility / 7. Society / 8.6. Social Product
S02	Percentage and total number of business units analyzed for risks related to corruption.	☒	
S03	Percentage of employees trained in organization's anti-corruption policies and procedures.	☒	
S04	Actions taken in response to incidents of corruption.	▢	5.3 Internal Audit / 5.4 Conflict of interests - Tackling corruption. / There are no incident of corruption during the reported period.
S05	Public policy positions and participation in public policy development and lobbying.	☒	
S06	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	☒	
S07	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	▢	8.7.2. Fair competition
S08	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	▢	There are no significant fines or sactions during 2013
S09	Operations with significant potential or actual negative impacts on local communities.	☒	
S010	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	☒	
Social: Product Responsibility			
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	■	5.5.2 Management Systems / 8.2 Electromagnetic radiation / 8.5 Responsible Products
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	☒	
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	▢	8.3 Cmmunication for All / 8.4 Responsible Services / 8.5. Responsible Products
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	☒	
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	▢	8.9 Customer Satisfaction

PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	▮	8.4.3 Informing the Public / 8.7 Responsible Marketing
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	▮	8.7.1 Communication principles
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	■	8.8 Intellectual Property Rights & Communication Privacy
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	☒	

Detailed GRI Tables <http://www.windsr2013.gr/part3.php#kefalaio15>

VERIFICATION STATEMENT

In accordance with the principles of :

«Global Reporting Initiative Sustainability Reporting Guidelines»
(GRI G3.1)

and

the Level Check Verification Process that was conducted by TÜV HELLAS,
in the Sustainability Report for the Year 2013 of the company

WIND HELLAS TELECOMMUNICATIONS SA

Verified for its compliance with the principles of
Level B (+) of GRI G3.1

FOR TÜV HELLAS



S. Poltekis
General Manager



N. Paparoupas
CSR Product Manager

Athens, 15/7/2014



INDEPENDENT EXTERNAL VERIFICATION REPORT

To: Management of **WIND**

1. Independent Verification Report

The company **WIND HELLAS TELECOMMUNICATIONS S.A.** (hereafter "**WIND**") has commissioned **TÜV HELLAS S.A.** to ensure the Corporate Social Responsibility Report for the year that ended on December 31, 2013.

2. Scope of the verification project of the Corporate Social Responsibility Report

Scope of the assurance project is the provision of external assurance service about the accuracy of the claims mentioned in the sections "*Occupational Health & Safety*" and "*Environment*" (corporate report sections 7 & 8 respectively).

3. Conclusions of TÜV HELLAS

According to the project scope and under the assurance procedures, followed by **TÜV HELLAS**, it is concluded that:

- No misstatement of assertions and statements contained in Chapters «*Occupational Health & Safety*» and «*Environment*» has come to the attention of **TÜV HELLAS**.
- No errors of **WIND** in data collection nor in transferring data in the Corporate Social Responsibility Report, which may materially affect the claims as presented in the «*Occupational Health & Safety*» and «*Environment*», have come to the attention of **TÜV HELLAS**.

4. The basic steps for the Verification

In order to arrive at the above conclusions, **TÜV HELLAS** followed the below mentioned procedures:

- The procedures followed by **WIND** in order to identify and define important issues to be included in the chapters «*Occupational Health & Safety*» and «*Environment*».
- Selected executive personnel of **WIND** who have functional responsibility in Corporate Social Responsibility matters were interviewed in order to understand the administrative structure of managing matters of Employment and Environment as part of the Corporate Social Responsibility.
- The contents of the chapters «*Occupational Health & Safety*» and «*Environment*», were reviewed in comparison to the findings of the above steps, and improvements in the Corporate Social Responsibility Report were recommended where deemed necessary.

5. Limitations of the Review

- The range of the review addresses to the activities of **WIND** in Greece.
- In case of any discrepancy in the translation between Greek and English version of Corporate Social Responsibility, the Greek version shall prevail.
- The review is not aimed at ensuring the adequacy of the circumscribed policies or the effectiveness of the operation of the circumscribed measures, but is limited to the information provided in the chapter «*Occupational Health & Safety*» and «*Environment*».



INDEPENDENT EXTERNAL VERIFICATION REPORT



6. Verification Standard and Evaluation Criteria

The review for the Corporate Social Responsibility Report 2013, for the year that ended on December 31, 2013 was conducted by verifiers in accordance to **TÜV HELLAS's** Corporate Social Responsibility Certification Protocol, based on the GRI-G3.1 guidelines.

The assessment of the claims and data of the chapters «Occupational Health & Safety» and «Environment» (corporate report sections 7 & 8 respectively), was based on the following criteria:

- **Completeness:** with regard to the data of the Chapters «Occupational Health & Safety» and «Environment», as defined by the limits and the period of the Corporate Social Responsibility Report.
- **Accuracy:** regarding the allegations with regard to the data of the «Occupational Health & Safety» and «Environment», for the sustainability performance of **WIND** in 2013 and the collection and transfer of data in the corresponding chapters

7. Responsibilities and Functions

The Team for Corporate Social Responsibility of **WIND** carried out the Corporate Social Responsibility and Sustainable Development Report that is addressed to the interested parties, thus, is responsible for the information and statements contained therein. Responsibility of **TÜV HELLAS** is to express the independent conclusions on the issues as defined in the project scope and in accordance to the relevant contract. The project was conducted in such a way so that **TÜV HELLAS** can present to **WIND's** administration the issues mentioned in this report and for no other purpose.

8. Impartiality and Independence of the verification team

TÜV HELLAS states its impartiality and independence in relation to the project of assuring the Corporate Social Responsibility Report of **WIND**. **TÜV HELLAS** had not undertaken work with **WIND** and did not have any cooperation with the interested parties that could compromise the independence or impartiality of the findings, conclusions or recommendations. **TÜV HELLAS** was not involved in the preparation of the text and data presented in the Corporate Social Responsibility Report of **WIND**.

For TÜV HELLAS

N. Paparoupas
CSR Product Manager

S. Peltekis
General Manager

Athens, 14/7/2014



Statement GRI Application Level Check

GRI hereby states that **WIND HELLAS TELECOMMUNICATIONS S.A.** has presented its report "SUSTAINABILITY REPORT 2013" to GRI's Report Services which have concluded that the report fulfills the requirement of Application Level B+.

GRI Application Levels communicate the extent to which the content of the G3.1 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3.1 Guidelines. For methodology, see www.globalreporting.org/SiteCollectionDocuments/ALC-Methodology.pdf

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

Amsterdam, 13 August 2014

Ásthildur Hjaltadóttir
Director Services
Global Reporting Initiative



The "+" has been added to this Application Level because **WIND HELLAS TELECOMMUNICATIONS S.A.** has submitted (part of) this report for external assurance. GRI accepts the reporter's own criteria for choosing the relevant assurance provider.

The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world's most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance. www.globalreporting.org

Disclaimer: Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 28 July 2014. GRI explicitly excludes the statement being applied to any later changes to such material.

We thank you for reading the present publication.
If you wish more information or clarification, please conduct:

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You can send your comments to
csr@wind.gr

or you can fill in the online form
www.wind.gr

Designed by:



Editing of the Report,
GRI Indicators Structure by:



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