

Sustainability Report 2021



NOVA

WIND



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MESSAGE FROM THE CEO



Dear friends,

Following the inclusion of Wind Hellas into the United Group and the upcoming merger between Nova and Wind Hellas, a new and exciting era begins.

Completing the merger and maintaining a momentum in the acquisition of customers is a top strategic priority for us while establishing the dynamics of this new united team.

2021: A pivotal year signaling a new era

2021 was undoubtedly a pivotal year. This strategic development will create a new and stronger landscape in Greek telecommunications, enhancing the digital transformation in the sector. The merger between Nova and Wind will play a central role in the Greek telecommunications sector providing more competitive and higher quality services to consumers.

Strong resilience despite challenges

Last year was also characterized by the pandemic. Wind Hellas, as all Greek businesses in 2021, faced challenges. However, our course was characterized by strong resilience in both financial and operational indices. There was significant development of strategic and financial targets throughout the year. All Wind Hellas' employees, with their devotion, impeccable collaboration and excellent work, played a key part in achieving our targets.

We responded immediately to challenges

Speaking about challenges, I could not omit the Ukrainian crisis. With profound solidarity and support to the people of Ukraine, Wind and Nova offered humanitarian aid through the non-profit organization "Oloi Mazi Boroume". At the same time, we wanted to offer practical help to our mobile and fixed telephony subscribers to stay in contact with their loved ones during these hard times by offering free communication to and from Ukraine.



Meanwhile, in collaboration with the Ministry of Migration and Asylum, we provide sim cards to refugees who arrive at our country and, in communication with the authorities, we offer free wi-fi in refugee camps. At the same time, we responded to a request submitted by the Journalists' Union of Athens Daily Newspapers (ESIEA), to provide telecommunications equipment to the Union of Journalists of Ukraine.

We keep going strong in order to extend the possibilities of everyone in the new digital era

We are taking our next steps with the commitment to make connectivity a reality so that more and more people can participate equally every day in a rapidly changing digital society and benefit from the broad range of opportunities offered by digital technology.

Enjoy your reading,
Panagiotis Georgiopoulos
CEO Nova-Wind Hellas



A photograph of two workers, a man and a woman, in a large industrial facility. They are both wearing white hard hats and high-visibility yellow safety jackets with reflective silver stripes. The man is holding a tablet and looking at it, while the woman is pointing upwards with her right index finger. In the background, there are large industrial structures, including what appears to be a wind turbine component being assembled. A large, semi-transparent blue number '2' is overlaid on the bottom left of the image.

WIND HELLAS

WE INVEST IN DEVELOPMENT

At Wind Hellas we put digital transformation into practice. We contribute to the development of innovative applications with new generation networks and enhance the ability of people, businesses and society to create value for themselves and the common good.

Wind Hellas at a glance

Today Wind Hellas has a total of 4.1 million subscribers in mobile, fixed telephony and subscription TV. The company continues to invest in new generation infrastructures in both mobile and fixed telephony and internet and to develop a proprietary fiber optic network with speeds up to 1 Gbps.



Products & Services

Wind Hellas offers mobile and fixed telephony services, broadband Internet and subscription TV.

Our basic products in 2021:

Individuals

Mobile & Fixed Telephony Bundles:

- WIND ONE 3GB (50 MBPS)
- WIND ONE 10GB (50/100/200MBPS, 100/200FTTH)
- WIND ONE Unlimited GB (κατ 50/100/200MBPS, 100/200FTTH)

Mobile Plans - Contract:

- W 3GB
- W 10GB
- W Unlimited GB

Mobile Prepaid Plans:

- F2G
- Q

Fixed Telephony & Internet Plans:

- WIND Double Play
- WIND Fiber (50,100,200)
- WIND Fiber to the Home (100, 200)

Mobile Broadband Plans:

- SimpleFi (SimpleFi / SimpleFi 2) (contract) until March 2021
- SimpleFi 4G/ 5G (contract) since December 2021
- SimpleFi on the Go (5/10/20/30 Gb) (contract)
- SimpleFi on the Go Unlimited 4G 4G since December 2021
- WIND Mobile Broadband ((prepaid)

WIND VISION, a subscription TV service with 2 packs:

- Family Pack (more than 50 subscription channels)
- Full Pack (Family Pack channels + 9 sports channels)

Businesses

Mobile Plans - Contract:

- W Business Unlimited for unlimited calls
- W Business (x)GB
- XS Business
- Business Control 300

Business Data Mobile telephony - Contract Plans:

- WIND Business Data 10GB
- Business SimpleFi On The Go 4G
- WIND Mobile Broadband
- Business SimpleFi 4G & 5G

Vehicle Fleet Management Plans:

- WIND Fleet Management

Professional Refrigerator Management Plans:

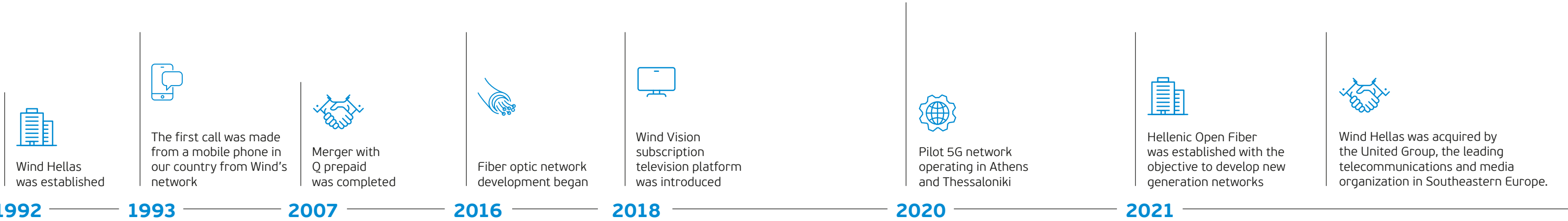
- WIND Freeze Alert

Clientele and Promotion Management Plans:

- WIND Marketapp

Corporate Fixed Telephony Plans:

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



Financial Growth

Wind Hellas is one of the largest private investors in Greece. In 2021, Wind Hellas realized investments up to €91.3 million in network modernization and new generation infrastructure, creating value for the society, contributing to the economy and the competitiveness of the country.

Financial Information

Description	2020*	2021
Turnover	508.6	532.0
Investments	89.9	91.3
Social security contributions	6.0	5.5
Total financial liabilities	520.3	0.0
Total equity	333.2	69.2
Total assets	1,767.1	1,354.7
Mobile, fixed telephony and Wind Vision customers	4.2	4.1
Number of stores at the end of the period	194	194
Employees (FTEs)	874	876
Employees (Heads)	875	877

* The financial results for the year 2020 have been adjusted according to the revised IAS 19 standard.
** All financial figures are in millions of euros.



Hellenic Open Fiber

A New Fiber Optic Company

In November 2021, Wind Hellas announced the establishment of the new subsidiary company, Hellenic Open Fiber (HOF). HOF's scope is to accelerate the development of next generation networks with the provision and implementation of fiber optics to residencies (Fiber to the home) and businesses (Fiber to the office).

Total investment to 2026 is exceeding 150 million euros and the economical impact is estimated to approximately 500 million euros. This is enhancing the Greek economy with 600 new job positions and actively supporting local economies around the country.

HOF's roadmap is to make fiber optic available to more than 600,000 homes within the next 5 years, significantly upgrading existing broadband infrastructure in the country.

Wind Hellas participates in institutional bodies, sectoral associations and committees thus contributes to the progress of the industry through the exchange of know-how and highlighting sustainable development issues and fostering entrepreneurship and the country’s competitiveness

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

Professional bodies

- Greek Mobile Operators Association (EEKT)
- Hellenic Federation of Enterprises (SEV)
- Federation of Hellenic ICT Enterprises (SEPE)
- European Competitive Telecommunications Association (ECTA)
- Hellenic Advertisers Association (SDE)
- American-Hellenic Chamber of Commerce
- Association of Business and Retail Sales of Greece (HRBA)
- Greek People Management Association (GPMA)

Bodies for sustainable development

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

We promote responsible entrepreneurship & technological innovation

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

In 2021 we participated in:

85th Thessaloniki International Fair

We participated for the second consecutive year in the forum “Creating the Next Day”, the institutionalized dialogue platform taking place as part of the Thessaloniki International Fair. Representatives of political and entrepreneurial leadership discussed on the development and financial issues of the country, the consequences of the unprecedented health crisis and the challenges it creates for the prospects modernizing Greece.



The Economist: 5th Sustainability Summit for SE Europe and the Mediterranean

Political, business and academic leaders from all over the world analyze the impact and the prospects in the country and in Europe in the post-COVID era.



Distinctions

HR Awards 2021

SILVER Award in “Pandemic Response”

BRONZE Award in “Change Management Strategy”

Wind Hellas was distinguished for its people corporate practices and policies put forward during the pandemic, as well as for strengthening the organizational skills that accelerated the digital transformation of the company.





SUSTAINABLE
DEVELOPMENT

WE DO RESPONSIBLE BUSINESS

We have made a decision, to be an active organisation with a “social role” in the community and to help and lead within our means on critical issues.

Our Approach to Sustainable Development

Our approach towards sustainable development constitutes for us an integrated business approach through which we create value for all stakeholders employees, suppliers, customers, the society, shareholders, the State, authorities, etc.

Sustainable Development Strategy “25 Goals for 2025”

Our goals for 2025 are fully incorporated in the operation of the company. It is an ambitious people and environment-oriented action plan.

The goals are based on the ESG criteria (Environmental - Social - Governance) and international standards for sustainable development (GRI, SASB). Furthermore, they are fully aligned with the European Green Agreement on Climate Neutrality by 2050 and with the Sustainable Development Goals (SDGs) by the United Nations for 2030.



Progress of goals



Customers

Digital connectivity for all. Continue Optical Fiber and 5G mobile networks deployment with an investment of €500 million with aim to cover 90% of the population by 2025.	5G: Population coverage in the end of 2021 reached 36%. Optical fibers: 65 thousand households have access to the proprietary fiber optic network with fixed speeds that reach 1 Gbps.	
Keep consumers informed and engaged for 25 Goals for 2025.	We constantly keep our consumers informed by sending press releases to the media, through corporate SoMe, articles, participating in conferences, sustainability report.	
Customer Satisfaction (CSAT) ≥ 80%.	The goal was achieved at 91.86%.	
A digital network that promotes sustainability and the adoption of sustainable practices.	Programs (WIND ONE pro, Myrmex etc.) have been implemented.	
Improved digital customer experience with integrated and secure communications services.	In 2021, 31.4% of our subscribers used MyWINDapp compared to 23% in 2020. In 2021, 62.5% of our customers received their bill electronically (via ebill) compared to 53.2% in 2020. The goal is to increase the percentages of registered users.	

Employees

Employee engagement at 75% (based on surveys).	The goal was surpassed at 78%.	
Flexy work for 85 of employees.	The goal was surpassed with the participation of more than 90% of employees during outbreaks of the pandemic.	
100% participation and awareness of employees on sustainable development on an annual basis.	Employees are informed regularly through weekly newsletters. The goal is on progress.	
Enhance and introduce new wellness programs.	The “W for Women” initiative was implemented. The goal is on progress.	

Society

400 hours of volunteering in social and environmental initiatives per year.	For 2021, Wind Hellas carried out 2 voluntary blood donation. The goal is on progress.	
Empower women on enhancing skills through partnerships and initiatives to achieve their goals.	The goal was achieved by implementing the new “W for Women” initiative.	
50% increase awareness for kids@safety program.	Percentage increased by 15%. The goal is on progress.	
Provide digital access to the residents of remote areas with a view to ensuring equal participation in the digital future.	The goal is on progress.	

Environment

100% separation and treatment of biowaste in offices.	Due to the remote working of employees (>50%) there were no developments for 2021. The goal is on progress.	
Reduction of energy consumption in base stations and data centers by more than 10%.	Energy consumption for 2021 was reduced by 3% in relation to 2020. The goal is on progress.	
Reduction of fleet vehicle emissions by using hybrid cars by at least 10%.	The goal is on progress.	
Use of technological solutions for the protection of the environment and biodiversity of Greece.	In 2021 we implemented three programs (Protection of Cretan Date Palms, Balkan Chamois, support to the Forest Fire Protection Volunteers of Attica (EDASA), which continue. The goal is to implement more programs.	



Corporate Governance

35% of women in roles of responsibility.	The percentage of participation of women in 2021 rose at 31% in 2021.	
Participation of 100% of employees in updates on the WIND Code of Conduct.	The goal was achieved at 100%.	
Conduct compliance checks on personal data protection and publish relevant data protection guidelines.	Compliance checks on personal data protection have been carried out in the organization for 2021. The goal is on progress.	
Update the Supplier Code of Conduct and incorporate Sustainability Assessment Criteria.	The goal is on progress.	
Compliance with SASB standards and other sustainability ratings.	Since 2020 we follow and apply the SASB standard. In 2021 we participated in S&P's sustainable development index CSA.	
Expenditure to domestic suppliers ≥ 90% of total.	The goal was achieved at 94.2%.	
Use of 100% green electrical energy through Guarantees of Origin and reduction of emissions from energy production by 10%.	We have already verified procurement of 25,840MWh with guarantees of origin. Our goal is to purchase in 2022 guarantees of origin from RES for 100% of our billed electricity from our providers.	
10% of WIND Stores to become Carbon Neutral.	The second store of the chain was certified as climatic neutral in 2021. The goal is on progress.	

Sustainable Development Indices

Wind Hellas participates in international and national indices, rankings and ratings for sustainable development.



The most sustainable companies in Greece

Wind Hellas was included in the group of “The most sustainable companies in Greece” for 2022. This is a distinction that confirms the commitment of the company to sustainable development respecting people, society and the environment, as well as the substantial contribution of the company to the achievement of the Sustainable Development Goals of the United Nations (SDGs).

Participation in S&P’s international sustainable development index

In 2021, Wind Hellas participated for the first time in S&P’s international sustainable development index, namely the Corporate Sustainability Assessment (CSA). The CSA evaluates initiatives developed by companies in the Sustainable Development field and the systemic monitoring of their progress through policies, procedures and indices. 7,000 companies participated in 2021, mainly listed companies.



Sustainable Development Governance

We follow strict corporate governance standards, which ensures balance between management, entrepreneurship and company performance.

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

Structure Of Sustainable Development Governance



Stakeholders

We constantly communicate and align with our key stakeholders, who have the capacity to influence and get influenced by our business operations. We have proceeded to map relationship with them in an accurate manner. Stakeholders of Wind Hellas either belong to the internal environment of the organization (shareholders, employees, commercial network) or exist and act in the external environment, in Greece and/or internationally (regulatory authorities, media, local government, suppliers, partners, customers, central government, academic community, NGOs).

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

We approach our material issues in responsible manner

Materiality Analysis

To draw up the Sustainability Report, Wind Hellas follows the international standards laid down by the Global Reporting Initiative (GRI Standards) and the Sustainability Accounting Standards Board (SASB). We discuss with representatives our key stakeholder groups with no exclusions and discriminations. We acknowledge that our key Stakeholders have direct impact and influence on our Sustainable Development and, in the process of identifying the most material issues. Consequently we actively involve those key stakeholder groups in the materiality process to address the most significant issues pertaining to our business and record our response to their needs, concerns and expectations.

Identifying material issues

For the years 2020 and 2021, the material issues for Wind Hellas were defined through an online questionnaire by key stakeholders (employees, customers, suppliers, local community, NGOs, media abd shareholders). The analysis of the aforementioned data revealed our material issues:

Protection of personal data

Employee health & safety

Environmental legislation

Social benefits of employees

Competition legislation

Waste management

Network investments

Electromagnetic radiation

Safe use of new technologies

Privacy of communication

Anti-corruption

Non-discrimination

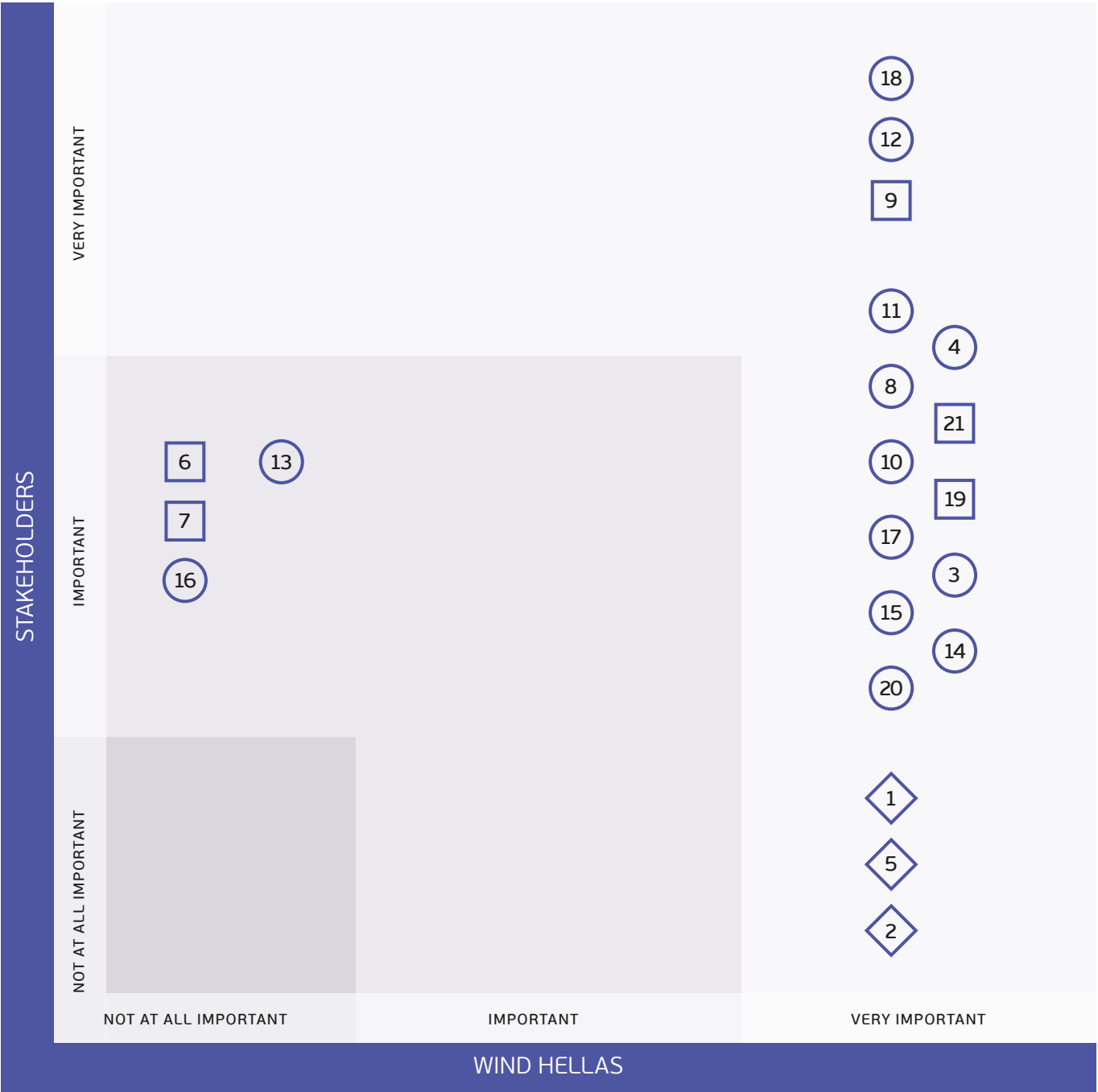
Diversity and equal opportunities

Quality of services

Indirect social impact

Profitability

Procurement practices



- ENVIRONMENT

SOCIETY - EMPLOYEES - MARKET

ECONOMY
- 1

Indirect social impact
- 2

Procurement practices
- 3

Anti-corruption
- 4

Competition legislation
- 5

Profitability
- 6

Energy consumption
- 7

Emissions
- 8

Waste management
- 9

Environmental legislation
- 10

Electromagnetic radiation
- 11

Social benefits of employees
- 12

Employee health & safety
- 13

Employee training
- 14

Diversity and equal opportunities
- 15

Non-discrimination
- 16

Support of local communities
- 17

Ensuring privacy of communication
- 18

Personal data protection
- 19

Safe use of new technologies
- 20

Quality of services
- 21

Network investments

CORPORATE GOVERNANCE

WE PURSUE TRANSPARENCY

We base our operation on values, policies and codes that ensure our commitment to responsible entrepreneurship. We incorporate high standards of corporate governance with the aim of creating value for our shareholders, customers, employees and suppliers.

Our approach

In 2021 we proceeded to plan carefully our work through responsible administrative practices, inspections and evaluation of our daily operations.

Responsible management

Our commitment is to offer our customers high quality services at the best price. Our corporate values support the implementation of our commitment, taking also into account our employees’ aspirations for a better work environment.

Integrity

I do the right thing, regardless of cost, with honesty and fairness for all.

Simplicity

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

Flexibility

I adapt quickly and effectively to the challenges of the market.

Entrepreneurship

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

Teamwork

I actively and positively support the team. I help so that everyone’s potential emerges and puts it into good use.



Our policies

Our strategy is based on our vision to “do the right thing”. In order to ensure that we carry out our business activities with respect and accountability, we have developed policies aimed at providing high quality products and services to our customers, ensuring the protection of their personal data and the privacy of telecommunications and the protection of the environment. Our policies can be found on the Wind intranet for employees, on the WIND extranet for our stores, and in print form in the workplace.

Quality Policy

Describes the commitment and values of the company as applied to the whole range of its operations.

Environmental Policy

Describes our commitment regarding environmental protection.

Security policy for the Protection of Privacy of Communications

We apply internally and impose on our contractual relations with third parties a security policy to ensure privacy of communications.

Business Continuity Management Policy

Describes our commitment to continue to provide services to our customers in an uninterrupted way in case of an event which could affect negatively business units, systems, and services.

Work Health & Safety Policy

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

Personal Data Protection Policy

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

Corporate Risk Management Policy

Describes the basic principles of risk management and sets out formal requirements for risk management and insurance in the individual units of the company. In addition to business requirements, it also focuses on responsibilities and procedures in order to ensure effective risk management.

Sustainable Development Policy (ESG)

Describes our commitment to sustainable development principles in our business activities and the manner in which we operate, acknowledging that such principles constitute a necessary condition for our long-term growth. The care for the health and safety of employees, respect and protection of the natural environment, comprehensive coverage of our customers’ needs and the harmonious coexistence with local communities in which we do business are the main Sustainable Development matters of Wind Hellas.

Management Practices

Wind Hellas is a Société Anonyme. The supreme body of the company is the General Meeting of Shareholders, which, pursuant to the articles of association, may take decisions on any matter pertaining to the company.

Board of Directors

The management and representation of the company and the management of its assets falls under the authority of the Board of Directors, which may consist of three (3) to fifteen (15) members. The current Board of Directors (BoD) of the company consists of the Chairman and two members. Also 2021, the Chairman of the Board of Directors acted as CEO. The BoD members took part in its meetings and jointly decided on the items on the agenda.

Composition of the Board of Directors in 2021

- For the period until 18/2/2021:
- Athanasios Zarkalis, Chairman and CEO
 - Nikolaos Babalis, Member
 - Nikolaos Panopoulos, Member

- For the period from 18/2/2021:
- Athanasios Zarkalis, Chairman and CEO
 - Charalampos Kyriakopoulos, Member
 - Nikolaos Panopoulos, Member

Communication with the Management

In order to decide on a strategy for realizing the investment plan of Wind Hellas, we communicate with the shareholders at regular intervals, informing them directly about all new developments in the company and the Greek market in general. The constructive two-way communication continues between employees and the Board of Directors.

During the year, briefing meetings are held on a regular basis between the heads of operations and groups and between each supervisor and his/her work team, so that all employees are aware of the company's objectives, strategic priorities and results.



Committees

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

Executive Management Committee

The Executive Management Committee consists of the CEO, the Managers and the Chief Officers, and it is responsible to decide on current matters pertaining to the company. It makes important decisions with respect to daily operations and the supervision of the company, the resolution of problems and the drafting of individual strategies, always in compliance with the decisions of the Company's Board of Directors and shareholders.

Regulatory Compliance Committee

The principal objective of the Supreme Regulatory Compliance Committee is to supervise the Regulatory Compliance Management System. The committee deals with regulatory compliance issues affecting internal and external functions of the company with respect to its principles and values, the application of the Code of Conduct, and as issues of corporate governance. It is comprised of the CEO, the Chief Information Technology and Transformation Officer, the Human Resources Executive Director, the Legal Adviser, the Chief Financial Officer and the Internal Audit & Regulatory Compliance Officer.

Special Information & Personal Data Security Committee

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

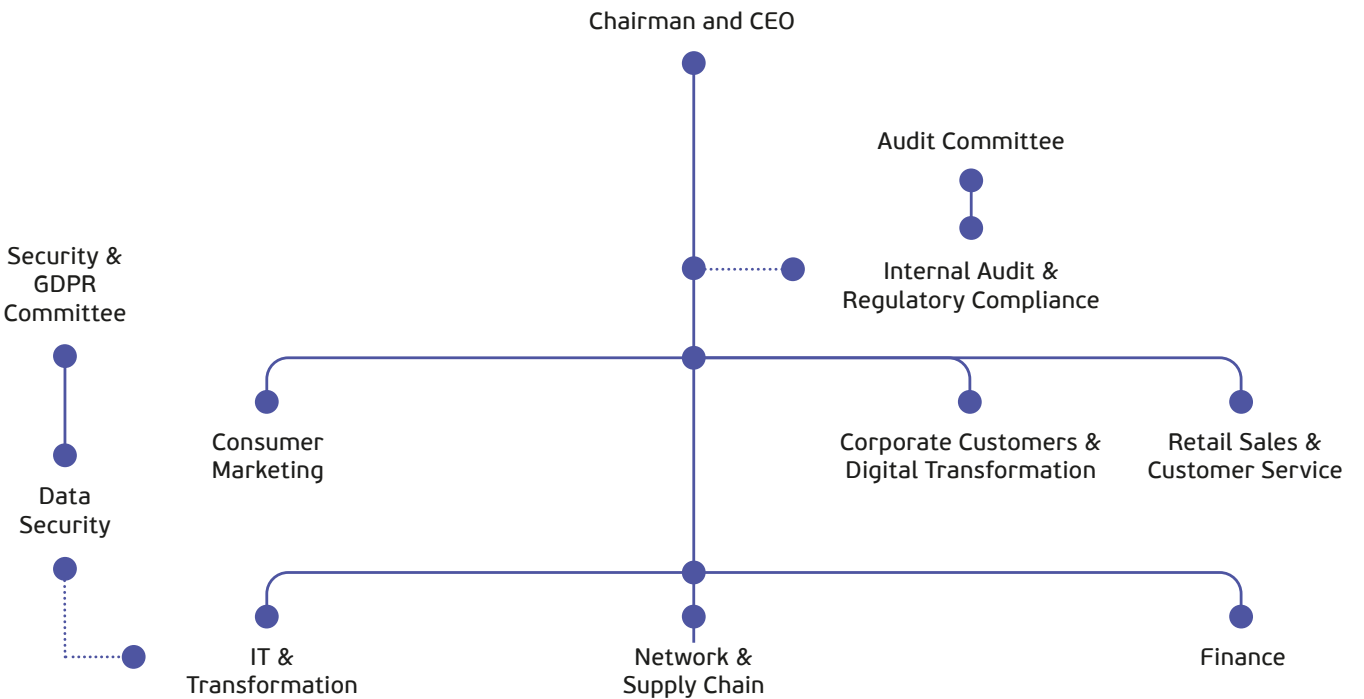
Investments Committee

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

Corporate Risks Committee

The basic objective of the Corporate Risks Committee is to support, inspect and monitor the application of Corporate Risk Management and Corporate Governance Systems. It is comprised of the Chief Information Technology and Transformation Officer, the Chief Retail Sales and Customer Service Officer, the Chief Financial Officer, the Chief Network and Supply Chain Officer, the Chief Consumer Marketing Officer, the Procedures and Corporate Transformation Manager and the Head of the Corporate Risk Management Department.

Organizational Structure 2021



Internal Audit & Audit Committee

The Internal Audit & Regulatory Compliance Directorate is responsible for providing reasonable independent assurance to the Board of Directors of the parent company that the internal audit system ensures compliance with the company’s policies, practices and procedures. This is accomplished by assessing the effectiveness of risk management systems, controls of operational procedures and governance practices.

The management is responsible for designing and operating the internal audit system, while the managers of the departments are responsible for creating appropriate policies and procedures to help the company achieve its predetermined objectives. Through the Audit Committee, which consists of at least three members, the organizational independence of the Internal Audit & Compliance Division is achieved, since the Committee reports directly to the Board of Directors of the parent company. The Audit Committee assesses and supports the work of the management and ensures the sufficiency of human and technical resources and unhindered access to information related to the auditing work. The committee is convened at least 4 times annually and is informed about any audit findings and recommended corrective actions, monitoring their progress over time.

Code of Conduct

The Code of Conduct of Wind Hellas is based on five interrelated pillars.

Values

The code is based on the company’s values with particular emphasis on integrity and the quote “do the right thing regardless of cost”.

Tone at the Top

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

Ongoing Debate

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

Freedom of Choice

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

Corporate Culture

Establishment of a uniform corporate culture by making the code part of our everyday behaviour.

The Code of Conduct of Wind Hellas provides the framework of the basic operating principles that guide our daily business behaviour. The Code of Conduct sets out the relationships both among our employees and with any third party they contact in the context of their work. At the same time we have developed communication channels for named or anonymous complaints regarding breaches of the code. Complaints can be made either online via the e-mail address codeofconduct@wind.gr or by post.



The main actions under the Code of Conduct were:

The implementation of ISO 19600 in the Compliance System

Wind Hellas implements ISO 19600 since 2016. The standard provides a framework for the implementation of compliance and guidance requirements in connection with the creation, development, implementation, evaluation, maintenance and improvement of an effective and responsive compliance management system.

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

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

Regulatory Compliance Framework

It supports the achievement of the regulatory compliance objectives of the company, establishing a compliance framework that encourages the implementation of Wind

Hellas’s activities in accordance with legal and internal requirements.

Conflict of Interest Policy

The purpose of this policy is to describe the principles we have adopted with regard to the management and monitoring of existing and potential conflicts of interest.

Gift Acceptance Policy

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

Fraud Response Policy with Main Directions

- The purpose of this policy is:
- To raise awareness among our employees regarding the meaning and prevention of fraud.
 - To provide guidance for what they have to do in case they become aware of similar incidents or suspect that similar acts are committed in order to form a single operational behaviour and culture on how to prevent and deal with such issues.
 - To describe and define the relevant actions that must be taken by the competent bodies in case of a fraud incident.
 - To facilitate the development of systems, procedures and control mechanisms that help to prevent and combat fraud.

Anti-corruption Policy with Main Directions

- Description of the requirements of Wind Hellas in order to achieve compliance with applicable anti-corruption legislation.
- Guidance to employees and associates as to how to behave.
- Compliance of Wind Hellas and its employees with the applicable laws. Violation of such laws could entail severe civil and criminal penalties for the company and its employees, consisting of heavy fines and even imprisonment.

No incidents of corruption have been reported to the Whistleblowing communication channel or directly to the Head of Regulatory Compliance and Internal Audit of the Company in 2021.

Non-retribution Policy

The purpose of the policy is to define the protection afforded by Wind Hellas against any adverse impact on employees who, in good faith, report behaviours that are inconsistent with the Code of Conduct and/or the law. For 2021 one incident of violation of the code of Conduct was reported. The incident was investigated by the Regulatory Compliance Committee and appropriate measures were taken.

Aiming at strengthening corporate culture and better assimilating the ethical rules of the Code of Conduct and regulatory compliance policies in order to safeguard customer information security, implement the principles of operational continuity, protect the environment and implement internal procedures and the company’s policies, we prepared comprehensive training material on all these topics in 2019. Such material was adjusted to the specifications of the company’s distance learning system.

In 2020, distance learning for all employees of the company was introduced, covering 70% of the staff by the end of the year. 100% of the staff had completed the training until the end of 2021.



Management Systems & Certifications

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

- Quality Management System
- Environmental Management System
- Occupational Health and Safety Management System
- Energy Management System
- Social Security / Business Continuity Management System
- Information Security Management System

Quality Management

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

- Design, Development, Provision, Sales, Invoicing and Support of Comprehensive Telecommunications Products and Services (Mobile and Fixed Telephony, Data, Internet and Broadband) for Private and Corporate Customers.
- Design, Development, Implementation, Operation, Support and Maintenance of Telecommunications and IT Infrastructure, Telecommunications and Data Networks, IT Systems and Applications.
- Design, Development, Monitoring, Control and Support of the WIND stores.
- The application of the quality management system includes:
 - Sales of Mobile and Fixed Telephony and Internet Services (WIND Mobile, Q Prepaid, WIND Fixed Telephony and Internet).
 - Retail Sale of Mobile and Fixed Telephony Devices, Electronic Equipment and Accessories.
 - Repair of Mobile Telephony Devices.
 - After-sale Service for Private and Corporate Customers

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

Quality: EN ISO9001: 2015

- First Certification: 2001
- Certificate Registration No. 44100011460
- Last certification renewal: 2020

Certification Body: TUV Hellas (TUV Nord Group)

Environment and Energy

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

- Design, Development, Provision, Sales, Invoicing and Support of Comprehensive Telecommunications Products and Services (Mobile and Fixed Telephony, Data, Internet and Broadband) for Private and Corporate Customers.
- Design, Development, Implementation, Operation, Support and Maintenance of Telecommunications and IT Infrastructure, Telecommunications and Data Networks, IT Systems and Applications.
- Design, Development, Monitoring, Control and Support of the WIND Chain of Stores.
- The application of the system in WIND stores includes:
 - Sales of Mobile and Fixed Telephony and Internet Services (WIND Mobile, Q Prepaid, WIND Fixed Telephony and Internet).
 - Retail Sale of Mobile and Fixed Telephony Devices, Electronic Equipment and Accessories.
 - Repair of Mobile Telephony Devices.
 - After-sale Service for Private and Corporate Customers.

The Environmental Management System is consistent with the international standard ISO14001..

Environment: EN ISO14001: 2015

- First Certification: 2009
- Certificate Registration No. 44104090360-000
- Last certification renewal: 2020

Certification Body: TUV Hellas (TUV Nord Group).

We also apply an ISO50001 Energy Management System to our energy-intensive facilities, with a certification scope that covers the operation of data and switching centers and management offices.

Energy: ELOT EN ISO50001: 2011

• First Certification: 2019
Certificate Registration No. 058190003
Certification Body: TUV Hellas (TUV Nord Group)

**Information Security Management:
ELOT ISO/IEC 27001:2013**

• First Certification: 2021
Certificate Registration No: 048210015
Certification Body: TUV Hellas (TUV Nord Group)
We apply an information security management system, the scope of which includes “Design, Development, Supply, Implementation, Training, putting into service and support of comprehensive and consolidated ICT and IT solutions, as well as the provision of Internet, Telecommunications and Specialized Services to Corporate Customers”.

Occupational Health and Safety

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

- Design, Development, Provision, Sales and Support of Comprehensive Telecommunications Products and Services (Mobile and Fixed Telephony, Data, Internet and Broadband) for Private and Corporate Customers.
- Design, Development, Implementation, Operation, Support and Maintenance of Telecommunications and IT Infrastructure, Telecommunications and Data Networks, IT Systems and Applications.
- Design, Development, Monitoring, Control and Support of the WIND chain of stores.
- After-sale Service for Private and Corporate Customers.

Occupational Health and Safety BS OHSAS 45001

• First Certification: 2017 Certificate Registration No: 4411617370062
• Last certification renewal: 2020
Certification Body: TUV Hellas (TUV Nord Group)

Business Continuity Management

We apply a Social Security-Business Continuity Management System, which covers all the company’s facilities and its scope includes:

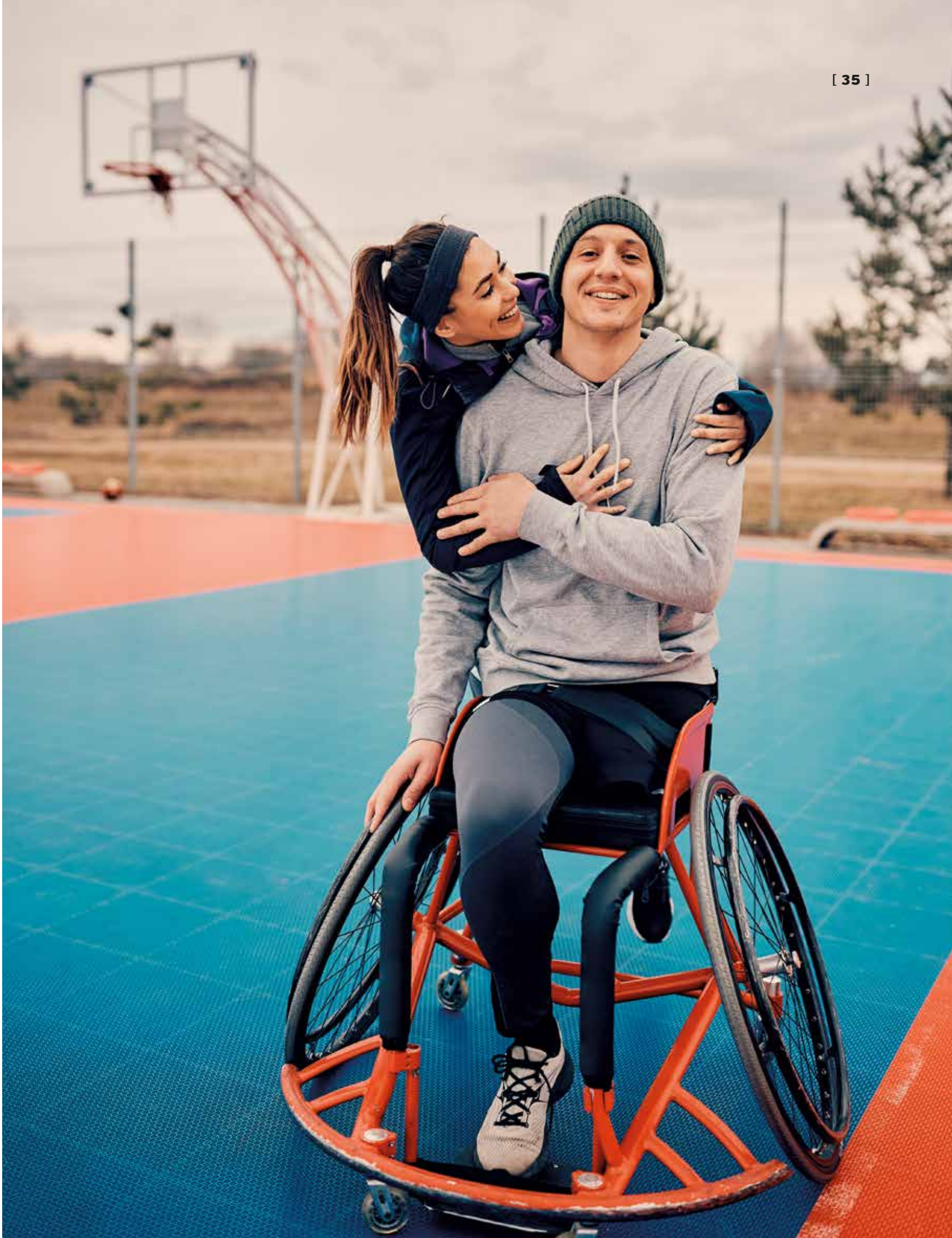
- Design, Development, Provision, Sales and Support of Comprehensive Telecommunications Products and Services (Mobile and Fixed Telephony, Data, Internet and Broadband) for Private and Corporate Customers.
- Design, Development, Implementation, Operation, Support and Maintenance of Telecommunications and IT Infrastructure, Telecommunications and Data Networks, IT Systems and Applications. The Social Security - Business Continuity Management System that we apply was certified in 2017 in accordance with the requirements of the following international standard.

Business Continuity: EN ISO22301:2019

- First Certification: 2017
- Re-certification: 2020

Certificate Registration No.: 054170001
Certification Body: TUV Hellas (TUV Nord Group)

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





SOCIETY

WE PROMOTE THE RIGHT TO CONNECTIVITY WITHOUT LIMITS AND DISCRIMINATION

We work to improve everyday life and to expand the possibilities of people and businesses through connectivity.

We contribute to the development of responsible digital citizens of the future

We have been guiding children to a safe online behavior for 11 years.



The Kids@Safety program offers guidance for a safe online environment for children and lays the foundation for the responsible digital citizens of the future. It helps parents and guardians prepare and guide children to adopt a safe online behaviour and educates parents to recognize and avoid potential risks. By providing advice on the proper use of the Internet and encouraging dialogue between minors, parents, guardians and teachers, the program also promotes the positive aspects of new technologies and critical thinking. The main communication channels of the program are the program's website www.kidsatsafety.gr and social media on Facebook, Instagram and Twitter.

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

We provide the Reception and Solidarity Center established by the Municipality of Athens with free communication services and equipment

Wind Hellas while providing actual support to people in need, responded immediately to the invitation of the Municipality of Athens for communication services and offered free high-speed wi-fi for one year to the guests at the Reception and Solidarity Center of the Municipality of Athens (KYADA).

Within the scope of the KYADA support action, Wind Hellas also provides free mobile phone devices with free communication to cover the needs of the "Streetwork" team. This team approaches socially vulnerable groups, maps homeless people who live in the city, records their needs and informs them about reception shelters and programs.



We contribute to equal accessibility

Recognizing the right of people with mobility challenges to fully and effectively participate in all aspects of social life, in 2021 we carried out a number of initiatives:

We ensure that people with disabilities have access to communication and customer services

We adopted a range of measures to ensure that each one of our subscribers, regardless of their physical characteristics, can function effectively in their daily life and communicate smoothly through Wind Hellas. In particular, we offered the following possibilities:

Accessibility of people with mobility challenges to Wind Hellas Stores

Prioritizing the safe and universal access of our visitors to Wind Hellas stores and the creation of a society without exclusions, we placed special non-fixed access ramps for entrance and exit at our stores, ensuring that accessibility is for all our customers.

Accessibility of people with hearing impairment

We provide daily and on a 24-hour basis immediate service through LiveChat and applications such as Facebook Messenger, Instagram and Twitter.

Accessibility of people with impaired vision and cognitive dysfunction:

We provide 24-hour service by phone through the lines 13700 and 13800. Calling 13700 is free of charge for service related to technical matters and malfunctions. Customers

can call 13800 for all other matters pertaining to service and the calls are charged as local calls.

We strive to constantly improve the experience of all visitors to our websites (www.wind.gr, www.f2g.gr and www.myg.gr), ensuring smooth navigation to the content by applying relevant accessibility standards and tools for people with impaired vision.

Furthermore, to ensure better service to our customers on matters pertaining to the connection of their terminal equipment, we provide the ability to send a technician to their place, taking all safety measures and free of charge, in order to ensure proper connection to the network of Wind Hellas.

Finally, we renewed our support to two sports associations, "Panathinaikos A.O. AmeA" (Panathinaikos Sports Club for People with Disabilities) and to "Sports Club for People with Disabilities Ionas". Our purpose through this action is to highlight the need to strengthen the dignity of people with disabilities and promote awareness of respect.

This initiative is a part of WIND's broader philosophy to ensure unimpeded accessibility and empowerment of people with disabilities. Our purpose is to encourage these people to enjoy the right to equal accessibility as other citizens.



DECEMBER 3

INTERNATIONAL DAY
OF PERSONS
WITH DISABILITIES

We support the Hellenic Association of Lifeguard Schools and SAFE WATER SPORTS

In order to ensure safety during summer trips and sea activities, the Hellenic Association of Lifeguard Schools and Safe Water Sports created a specialized "Lifeguard Rescue / First Aid" app. This app can be used by lifeguards to record accidents/incidents at beaches and helps competent authorities deal with any incidents immediately. Wind Hellas offered, over 400 smartphones free of charge, in which the app was pre-installed and over 400 low-cost plans while delivering the devices to all its members in Greece.



We respond to emergency situations

Free Emergency Services

In our effort to contribute to the resolution of emergencies, we offered free telecommunications services to our subscribers in Larisa, Elassona and Crete who were affected by the earthquake and at areas that were damaged by fires in Attica (Varympompi, Adames, Kryoneri, Thrakomakedones, the Olympiako Chorio), Messinia (Vasilitsi, Livadakia, Agios Georgios, Memi), Evia (Limni, Retsinolakos, Kalamoudi, Chronia), Achaia (Ziria, Kamares, Lampiri), Kos (area of Agios Vasileios, Tsoukalaria, Platani) and Rhodes (Maritsa, Psinthos, Petaloudes). Additionally, the National Network Management Center and the technicians of Wind Hellas worked intensively to restore the mobile telephony, fixed telephony and internet networks from damage.

We offer know-how and services to protect the environment:

We contribute to the protection of the environment and the Greek wild fauna. The Balkan chamois is a threatened animal species in Greece. Wind Hellas, aiming at protecting the species, leveraged its network and know-how to protect the environment and the Greek fauna of North Pindos Park.

We protect the forests of Attica. We supported the work of the Forest Fire Protection Volunteers of Attica (EDASA), for three consecutive years covering their telecommunication needs through our mobile network for the entire fire-fighting period.

We contribute to the protection of Cretan date palm. In cooperation with the Municipality of Rethymni, we implement an innovative IoT function which will contribute to the protection of the city's date palms through smart sensors communicating over Wind Hella's network and at the same time will provide valuable data for the long-term protection of biodiversity.



Social Product

At Wind Hellas we believe that technology provides possibilities and empowers vulnerable social groups. By acting on our beliefs, we contribute to the coverage of their telecommunication needs to reduce social isolation.

Support Lines

I OFFER Service

This is a joint charitable initiative of all three mobile telephony companies in Greece, which began in February 2006 and is of a charitable nature.

The service involves the activation of a common 5-digit number for a specific period of time, during which mobile subscribers are able to send as many SMS they wish (at a cost of €1+VAT), supporting a non-profit/non-governmental organization every time they do so. The service was not activated in 2021.

- **SOS Children's Villages** - We enable our subscribers to donate €2.016 to the SOS Children's Villages by calling or sending an SMS to the number 19820. In 2021, the amount of €2,168.55 (excluding VAT) was allocated through the contribution of Wind's subscribers.
- **The Smile of the Child** - We enable our subscribers to

donate €2 to The Smile of the Child by calling or sending an SMS to the number 19810. In 2021, the amount of €23,376.60 (excluding VAT) was allocated through the contribution of Wind's subscribers.

- **Ark of the World** - Our subscribers can donate €2 or €2.016 to the Ark of the World by sending an SMS to 19888 or 19828 respectively. A total of €12,543.12 (excluding VAT) was allocated in 2021.
- **Theophilos** - We enable our subscribers to donate €2.016 to the NGO "Theophilos" by sending an SMS to the number 19855. The amount of €1.72 (excluding VAT) was allocated in 2021.
- **ELEPAP** - We enable our subscribers to donate €2 to ELEPAP by sending an SMS to the number 19811. Overall, the amount of €1,116.90 (excluding VAT) was allocated in 2021.
- **AGKALIA** - We enable our subscribers to donate €2 to

the NGO “Agkalia” by sending an SMS to the number 19829. The amount of €73.29 (excluding VAT) was allocated in 2021.

• **Lampsi** - We enable our subscribers to donate €2.016 to the NGO “Lampsi” by sending an SMS to the number 19833. The amount of €2,667.42 (excluding VAT) was allocated in 2021.

• **Association Nosilia** - We enable our subscribers to donate €2.00 to the Association “Nosilia” by sending an SMS to the number 19827. The amount of €3.40 (excluding VAT) was allocated in 2021.

• **Make a Wish** - We enable our subscribers to donate €2 to “Make a Wish” by sending an SMS to the number 19808. The amount of €210.80 (excluding VAT) was allocated in 2021.

• **Together for Children** - We enable our subscribers to donate €2.016 to the association “Together for Children” by sending an SMS to the number 19805. The amount of €617.13 (excluding VAT) was allocated in 2021.

• **Oloi Mazi Boroume** - We enable our subscribers to donate €2.016 to “Oloi Mazi Boroume” by calling or sending an SMS to the number 19817. The amount of €7,915.97 (excluding VAT) was allocated in 2021.

• **Act of Kindness** - We enable our subscribers to donate €2.016 to “Act of Kindness” by sending an SMS to the number 19825. The amount of €666.87 (excluding VAT) was allocated in 2021.

• **Food Bank** - We enable our subscribers to donate €2,016 to “Food Bank” by sending an SMS to the number 19803. The amount of €311.10 (excluding VAT) was allocated in 2021.

• **Floga** - We enable our subscribers to donate €2.94 to “Floga” by sending an SMS to the number 19813. The amount of €1020.02 (excluding VAT) was allocated in 2021.

• **Frontida gia to Paidi** - We enable our subscribers to donate €2.016 to “Frontida gia to Paidi” by sending an SMS to the number 19804. The amount of €1.72 (excluding VAT) was allocated in 2021.

• **ELIZA** - We enable our subscribers to donate €2.016 to “ELIZA” by sending an SMS to the number 19800. The amount of €128.57 (excluding VAT) was allocated in 2021.

• **Hospice for Neuro-disability** - We enable our subscribers to donate €2.016 to the Hospice for Neuro-disability by sending an SMS to the number 19809. The amount of €1.72 (excluding VAT) was allocated in 2021.

• **IASIS** - We enable our subscribers to donate €2.016 to “IASIS” by sending an SMS to the number 19814. The amount of €89.14 (excluding VAT) was allocated in 2021.

Help Lines

• **Amber Alert Hellas** - Our telecommunications network throughout Greece, our customers are able to actively participate in the process of locating a child who is missing or has been abducted by sending an SMS to 1056 from their mobile phone.

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

Emergency Lines

We provide the option to make free calls to emergency numbers such as 100, 166, 199, 112, 197 and 108, even in case of barring due to debts. The numbers above are free of charge pursuant to the National Numbering Plan and the relevant regulatory framework.

We continue to support health

As an exclusive telecommunications provider we continue to support the work of the National Public Health Organization (EODY), covering the communication and equipment needs of the mobile units of the Ministry of Health that perform COVID-19 detection tests nationwide. In addition, we support the operation of the new support center in Maroussi by providing fixed telephony services.





OUR PEOPLE

PEOPLE ARE OUR GREATEST STRENGTH

We invest consciously in our people.

We believe in their uniqueness. We are committed to creating a work place in which all people can express themselves, create and evolve. Our people create the infrastructure so that everyone can participate equally in a digital society.

Our approach

The company operates as a responsible employer who ensures excellent working conditions and competitive benefits. The company rewards development, skill building and overall corporate success. Systematic training and constant professional opportunities for its people are self-evident requirements for the stable evolution and growth of the company itself.

Employees participate in the full range of social responsibility and voluntary action programs, as well as in all new initiatives that strengthen employment, development, progress of the employees and the company, and in the creation of value for society.

2021 was one more year that was affected by the pandemic.

Wind Hellas responded to challenges with specific actions, such as:

- We maintained an integrated action plan to combat COVID-19.
- We accelerated the digital transformation within the company through technological upgrades at all levels.
- We enhanced internal communication.
- We supported remote working to a great extent.
- We invested more in the “upskilling” and “reskilling” of our employees.
- We fully aligned with and applied all emergency directives issued by the State and competent authorities.
- We established a special “Help Line” for support in issues pertaining to certificates of employment, special purpose leave, COVID-19 tests, etc.
- For the second year, we distributed Christmas presents to employees in engaging and fun ways.
- We specifically planned and saw to the operation of Wind Hellas stores with reduced working hours, specifically as regards services for which the customer must appear in person at the store (e.g. identification of personal data).
- We placed a special divider at the work post (cash desk), provided necessary personal protective equipment and ensured that the persons present in every store did not exceed the maximum number.



Human Resources Data

At Wind Hellas, our goal is to attract, retain and develop professionals. Here, excellent professionals with knowledge, talent and passion for learning give their best every day, work flexibly and creatively and leave their mark in telecommunications and technology through their work. In 2021 we contributed significantly to the strengthening of the Greek economy, employing **877** employees.

Employee distribution by department and gender - Table 6.1				
	2020		2021	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
GENERAL DIRECTORATE AND OTHER ADMINISTRATIVE DEPARTMENTS				
TOTAL	84		91	
Women	48	57%	51	56%
Men	36	43%	40	44%
NETWORK				
TOTAL	187		191	
Women	28	15%	35	18%
Men	159	85%	156	82%
CORPORATE CUSTOMERS AND DIGITAL TRANSFORMATION				
TOTAL	131		104	
Women	59	45%	43	41%
Men	72	55%	61	59%
CONSUMER MARKETING				
TOTAL	75		72	
Women	41	55%	39	54%
Men	34	45%	33	46%
RETAIL SALES & CUSTOMER SERVICE				
TOTAL	165		198	
Women	106	64%	118	60%
Men	59	36%	80	40%
FINANCIAL DEPARTMENT				
TOTAL	86		87	
Women	51	59%	51	59%
Men	35	41%	36	41%
INFORMATION TECHNOLOGY				
TOTAL	147		134	
Women	40	27%	36	27%
Men	107	73%	98	73%
Grand Total	875		877	

Employee distribution by department		
DEPARTMENTS	2020	2021
GENERAL DIRECTORATE & OTHER ADMINISTRATIVE DEPARTMENTS	84	91
NETWORK	187	191
CORPORATE CUSTOMERS AND DIGITAL TRANSFORMATION	131	104
CONSUMER MARKETING	75	72
RETAIL SALES & CUSTOMER SERVICE	165	198
FINANCIAL DEPARTMENT	86	87
INFORMATION TECHNOLOGY	147	134
Grand Total	875	877

Employee Academic Level		
DEPARTMENTS	2020	2021
Post-graduate degree holders (including PhDs)	35%	36%
University degree holders	37%	35%
Technical diploma holders	28%	29%

For the year **2021**, **96.69%** of employees are employed under contracts of indefinite term (0.2% of said employees are employed under part-time employment contracts). The other **3.1%** are employees under full-time contracts for a predefined term. During 2021 we hired **127** persons. Out of these hires, **3** were in provincial areas (Thessaloniki, Crete and Patra). The job openings in our company are announced on our website www.wind.gr/career, as well as to websites pertaining to the labour market.

Distribution of employees by age		
DEPARTMENTS	2020	2021
<=35	183	181
36-45	442	406
46-55	238	275
>55	12	15
Grand Total	875	877

Human Rights & Equal Opportunities

At Wind Hellas, respect and protection of the internationally recognized human rights is a constant and non-negotiable commitment. We are committed that our human resources do not include minors and there is no forced labour. In addition, our company supports and promotes the creation of a work environment that acknowledges the value of diversity. Our goal is to be distinguished for our culture, which is based on equal opportunities for all employees without exclusions and fully respecting the unique identity of every person. This is a culture which promotes standards of behaviour that can motivate positive change both internally and in the broader market and the society in general. We state our loyalty and commitment to this purpose with the **Diversity and Integration Policy** we introduced in 2021, as well as by having signed the **Diversity Charter**, an initiative of the **European Commission**.

An equitable work environment that respects diversity

At Wind Hellas, our people are our priority. We create and lead the success of the organization all together through our shared values, our common vision, and those elements that make us all unique.

- We promote the sense of justice and equality throughout the employee life cycle at Wind Hellas by making decisions impartially, with objective criteria and on the basis of transparent procedures and policies.
- We create opportunities and empowerment initiatives for all our people so they can evolve in parallel with the dynamic growth of the company.
- We discourage any form of harassment or other form of intimidation in the workplace and we have developed the “Report on Unethical Practices” process in order to ensure that any concerns pertaining to behaviours who are inconsistent with the principles of the Code of Conduct are reported to the company. This year, one incident was recorded and it was immediately investigated.
- We provide equal opportunities for development and reward which are based on employee performance and are not affected.

Freedom of Association

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

Internal Work Regulation

Transparency and integrity in how we operate is reflected in the Internal Work Regulation we have drawn up and apply. This regulation promotes ethical values, respect for laws and proper business practices and the creation of an appropriate work environment. It is available to all our employees via the corporate website of Wind Hellas (intranet).



W FOR WOMEN

At Wind Hellas what makes us different is what unites us!



Actions for women employees of Wind Hellas



Empowerment and Skills Enhancement

Leading skills enhancement programs. Advancing Women Leaders: A comprehensive development program aiming at empowering women in roles of responsibility. 23 executives participated in the program and completed 414 hours of training in total.

"WomeNspire": Lectures that encourage and inspire. The first WomeNspire lecture took place in December 2021.



Active Support to Motherhood and Protection of Family

We grant five days of maternity leave in addition to those provided by the laws in force.

We extended reduced working hours for new mothers by three months in addition to the period provided by the laws in force.

We provide full remote working flexibility to new parents for the important moments of their children (until 6 years of age).



Well-being in the work environment

24/7 psychological and well-being support helpline. Additional health services through group healthcare plan.

Actions for the broader social environment

Wind Hellas implements the program "Women in Tech" to create opportunities for the next generation in STEM professions and to empower even more the position of women in technology. The most important actions of the program are:

Fully paid 6-month internship for new students and graduates of engineering and technology faculties.

Planning of a specialized training cycle in new technologies to develop digital skills and free access to technological equipment and tools, especially for young women who live in islands on the non-profit line.

Collaboration with the "Stegi gia ti Mitera kai to Paidi" (Housing for Mother and Child) program of the Ark of the World, for the education of women who raise their children alone in particular circumstances through a cycle of courses for the enhancement of their professional profile.

In 2021, 10 young students and university graduates with a background in technological and other studies were employed in crucial departments of our company in order to gain experience and they may potentially join the personnel of technical teams.

We believe in your value.
We believe in you.



We care for our people!

WIND for you

We ensure excellent working conditions, benefits and advantages for our employees, providing a comprehensive competitive package that rewards performance, skill building and overall corporate success. When joining the company, new employees are given a detailed individual presentation of the benefits by the Human Resources Department. Furthermore, all information is posted on the internal Intranet and employees are also informed via e-mail for anything new included in the benefits package.

Benefits Plan

Competitive fixed and floating remuneration plans that take into account evaluation by the employees themselves, contributing to a good work environment.

- Life insurance with disability/accident coverage.
- Group life insurance and healthcare plan, in which their family members can also participate.
- Check-up package for all employees.
- Services and products at reduced prices.
- Restaurant-cafeteria (at our facilities in Athinon Ave. and Paiania) at particularly reduced prices.
- Discounts and offers in shops and businesses throughout Greece.

WIND I win - WIND for you

We strive to ensure for us and our loved ones more competitive prices, discounts and offers to all our product categories, as well as seasonal bazaars with discounts of up to 90% on appliances and accessories and a variety of products and services from partners and non-partners.

WIND Flexy Work

In June 2018, the company introduced the program Wind Flexy Work, enabling employees to work remotely one day per week, making good use of all possibilities provided by technology. In addition, it gives the possibility to start the workday flexibly between 8:30 and 10:00 a.m. Wind Hellas was one of the first companies in Greece that applied remote work.

WIND friends & family

Great discounts for mobile telephony and fixed telephony plans and bundles, mobile broadband, Wind Vision and prepaid plan offers for us and our loved ones. At the same time, the 1240 service is available for direct and exclusive communication about any matter that concerns us, our family and our friends in relation to Wind Hellas products and services.



Employee health & safety

Protecting the health and safety of our employees, visitors and partners is a priority. Our goal is zero accidents and the constant improvement of the indices related to the workplace in the buildings where our employees work.

The table summarizes incidents over the past few years.

	Employee losses	Number of accidents (absence > 1 day)	Number of accidents (absence > 3 days)	Total days of absence from work
2020	1	2	2	90
2021	0	0	4	67

Our approach to target achievement

- We apply a certified occupational health and safety management system in accordance with the ISO 18001 standard.
- We identify, analyze and evaluate occupational hazards, including those resulting from the COVID-19 pandemic.
- We prepare Professional Risk Assessment Studies for each job, as well as safe work instructions.
- We make full use of experienced consultants: Safety Technicians and Occupational Physicians. We investigate together with them any accidents or incidents related to health and take measures to eliminate or reduce relevant risks.
- We regularly monitor the quality of the working environment by measuring all necessary parameters such as dust, ventilation, lighting, volatile organic compounds, room temperature, humidity, drinking water quality, radiation, noise.
- We provide equipped clinics and/or pharmacies in every facility.
- We regularly inspect the premises and workstations to detect in a timely manner any non-compliance and new risks and we use the findings from the inspections to ensure our continuous improvement.
- We keep open communication with the employees so that they can submit their comments and suggestions for improvement at any time by a plain e-mail or even orally.

In order to prepare employees for emergency situations we set up emergency teams and carry out evacuation exercises at our premises at regular intervals. These teams are trained on fire extinguishing and first aid matters, as well as on emergency procedures. Within 2021, 5 evacuation exercises were carried out in our premises at Oraiokastro, Patra and Iraklio, Crete. Training sessions of emergency teams were also carried out at Athinon Ave. and Paiania.

Maternity Leave

In 2021, **20 employees** were entitled to maternity leave and **19 made use of maternity** leave (including those cases where the maternity leave started in 2020 and continued in 2021).

Human Resources Development Procedure Grow@WIND

Everyone at Wind Hellas is proud of the high performance and continuous growth, values that are the main components of our culture. The main tool for cultivating them is Grow@WIND, which was designed in February 2013 by an interdepartmental team and is used by each employee. Grow@WIND's main pillar is to align employees of Wind Hellas with our corporate strategy, sustainable development goals and values through specific skills we seek to develop and constantly improve: achieving results, inspiration, active learning, focus on customer experience, perception of the "big picture". Grow@WIND is a 360o development process, which is consistently carried out every year and hosted on me@WIND. The Development Plan for each employee which results from Grow@WIND and is designed in collaboration with their supervisor ensures that we all have growth opportunities according to our capabilities and the needs of the company.

Training

Employee Growth & Development

Our key priority is the continuous training of our employees so that they can be empowered and grow through equal training opportunities. The training hours in **2021** reached **23,596**.

	Category	Training Hours	Percentage	Average training/ employee
2020	Upper-level Executives	54	0.9%	7.21
	Mid-level Executives	541	8.6%	
	Sales & Customer Service	1,111	17.6%	
	Technical Personnel	1,996	31.6%	
	Other Personnel	2,618	41.4%	
	Total	6,320		
2021	Upper-level Executives	51	0.2%	26.9
	Mid-Level Executives	2,573	10.9%	
	Sales & Customer Service	519	2.2%	
	Technical Personnel	16,121	68.3%	
	Other Personnel	4,332	18.4%	
	Total	23,596		

Sales Academy

At Wind Hellas we invest in our people and the enhancement of their skills through targeted training programs and initiatives. In an environment that evolves constantly and requires flexibility, customer experience is an important priority to which we want to respond with innovation and adaptability.

In this context, the Business Account Management Team participated in a training which was specifically designed to enhance sales skills and focus on the development of a long-term commitment towards our customers. **20 employees** participated in the program, the total duration of which was **640 training hours**.

Enterprise Risk Management Awareness Sessions

To safeguard smooth business operations and the future success of the company, Wind Hellas relies upon the framework of the international risk management standard ISO 31000:2018 “Risk Management - Guidelines”. To align with this new standard, “Enterprise Risk Management Awareness Sessions” were held online for the entire company. A total of **736 persons** participated in the program, the total duration of which was **331 training hours**.

Compliance Awareness Training

Wind Hellas has focused on the adoption of a Responsible Corporate Culture, confirming its commitment to compliance, not only with legislation and regulations governing its operation but also with its values and principles.

For this reason, we have developed an educational online (e-learning) program which covers the Regulatory Compliance Framework, Information Security issues and other policies of our company, such as ISO certifications and corporate procedures, corporate responsibility policy, etc. In 2021, a total of **352 employees** attended the program, having completed **528 hours of training**.

WIND Digital Learning Hub



For the two last years, the transformation of Wind Hellas into a “Digital Learning Hub” has been at the heart of our strategy for the development and education of our people. Through the training activities carried out in 2021, we aimed at strengthening the existing technical skills of our people and at the acquisition of new ones that go hand in hand with the digital transformation era. We also strengthened all our commercial roles with knowledge on new technologies and built strategic collaborations with international educational organizations which are specialized in new technologies in order to train and certify our people on them.

5G, CIoT, VoLTE & other New Technologies

In collaboration with Mpirical, an internationally reputable company that is an expert on telecommunications training matters, we designed and implemented a one-year digital program, the basic purpose of which was to strengthen the skill and technical knowledge on 5G and other new technologies, such as CIoT, VoLTE, GSM, GPRS, UMTS, LTE, Wi-Fi, Packet Transport Networks, etc

Out network engineers and technicians, namely **165 persons** in total, participated in this training and completed **19,466 training hours**.

ISO 27001:2013 | Awareness Sessions

Since information security is an all-time and particularly significant priority for our company, we ensure that our staff is educated on new policies and the practices we adopt. In 2021, **733 employees** participated in **330 hours for the certification** of the international standard ISO 27001:2013.

Internal Training Programs

In 2021 we continued organizing internal training programs, disseminating knowledge to our colleagues. Indicatively, we mention the following seminars: Python, Excel Basic, Advanced Excel, Independent Authority Notification and WINDGenius. **722 training hours** were completed through these actions. The training covered educational needs of various groups. More than **211 persons** participated.

Talent Management and Succession Planning

Being able to timely forecast the company’s future leadership needs and identify talented executives is extremely important to all of us. For this reason, the company has designed and implements the WINDerful Talent program.

Attracting Candidates Internally

We encourage the employees of Wind Hellas to explore development opportunities in other groups and functions of the company. Thus, when there are new job positions, our priority is to choose among the existing employees as the best source of qualified candidates. In 2021, approximately 12% of Wind Hellas employees made a significant step forward by being promoted, changing responsibilities or moving to new teams.

Attracting Candidates Externally

We support and participate in multiple career days with the purpose to attract candidates, inform them about opportunities for work and development at Wind Hellas and to highlight the company’s image as an employer. In 2021 we participated in the career days of Greek universities (MBA Career Days of the Athens University of Economics and Business, ALBA Career Forum, Career Days @Deree College, ReGeneration, etc.), which were held online due to the COVID-19 pandemic.



WIND Young Talents - Graduate Trainee Program

Since October 2015, our Company has implemented 3 cycles of the “WIND Young Talents - Graduate Trainee Program”, whereby more than 30 new university graduates with a Master’s degree, talent and will, and without any previous relevant work experience, joined our team. Focusing on today’s digital skills and out-of-the-box thinking, we invited young men and women to register for participation through the interactive microsite of the program, windyoungtalents.gr. At the 4th cycle of WIND Young Talents, the motto was: “No experience? Big opportunity.”

Through a systematic and specialized selection procedure that contains Cognitive Tests, Assessment Centers and interviews with the Human Resources team and top-level executives of the company, the new talents who stand out are hired under an employment agreement of indefinite term and start their “journey” at WIND.

Incubators

In 2019, we launched a new initiative aiming at providing specialization to young people and connecting them to the

labour market. After having completed their training in a modern work environment, incubators can be organically absorbed into the Company, to the extent there are relevant needs. Indicatively, this initiative commenced with the CRM team and subsequently it expanded to other departments, such as Marketing and Network. For 2021, **4 new incubators** were added to the **IS & Digital Services** Departments.

Corporate Induction Programs

Since early 2014 we carry out Welcome OnBoard, an induction process for all new recruits in our company. This is an event aiming at familiarizing new employees with the operations and the way we work at Wind Hellas in a simple, interactive and effective way.

Two-way Communication

We utilize modern internal communication media to immediately inform employees on issues that concern them. The methods and channels of open and constructive dialogue we use are research, workshops, meetings, electronic communication, the newly renewed Wind Intranet, on which all the news concerning our company and industry are posted, as well as our most state-of-the-art platforms, such as Microsoft Teams.

In special circumstances, special microsites are also created for internal use in order to provide adequate information and guidance to our colleagues about events that interest them.

Digital Transformation και Wind DigitAll campaign

With a strong start in 2017, a series of new tools came to complete the digital transformation of the company and give flexibility to the way we work and interact. With the initiative of the WIND Digit ALL campaign, we managed to learn and provide to our employees a new, simpler and modern work method. Thus, long before we had to shift to a remote work system due to COVID-19, the employees of Wind Hellas were already familiar with and used routinely all Microsoft cloud digital tools (MS Teams, One Note, One Drive etc.).

Employee Blood Bank - Voluntary Blood Donation Program

This is one of our most important initiatives, which started in 2002 and since then it is implemented twice a year. Since 2002 and to date, the Blood Bank counts **1,443 voluntary blood donations**. In **2021**, the Blood Bank covered the needs of **17** of our fellow human beings (colleagues and their relatives) with **33 blood units**.

Events and theater for children

In 2021 we collaborated with theaters and offered to our employees interesting and creative choices to enjoy with their children during Christmas holidays. In this manner, **44 colleagues and their families** received invitations for theater performances. In addition, in collaboration with Christmas Factory and Playmobil Fun Park, **42 children of our employees** and their parents had the opportunity to have fun in exciting activities.

New HRMS – WIND Digital For Me

In 2021, within the scope of the digital transformation and the technological progress of the company, we introduced a new HRMS system which is based on the Oracle platform and configured according to the needs of WIND’s people. In order to upgrade our daily routine, from the simplest to more complex issues, this new platform replaces me@WIND, which had been used by the whole company, and automates many processes. Thus, we gain greater speed with respect to execution times and bureaucracy. Everything works based on mobile logic and employees have access to the platform from any device simply and quickly.

Employee Opinion Surveys (Pulse Check)

Having introduced Pulse Check since 2020, we made use of this important institution for one more year in order to get targeted feedback from our people and act on it, by planning “quick win action plans” within teams. In the Pulse Check that was carried out in April 2021, we were delighted to see that a higher percentage of Wind Hellas’s employees participated, which reached 91%.

In addition, we are proud of the fact that, for one more year, we accomplished an increase compared to the 2020 Pulse Check, both in the percentages pertaining to the engagement of our people (increase by 3 percentage points) and to the percentages related to enablement in the organization (increase by 6 percentage points).



MARKET

WE OFFER UNIQUE CUSTOMER EXPERIENCE

At Wind Hellas we encourage our customers to collaborate with us, ensuring high quality of services and product reliability. Customers choose us because they can rely on us for services supported by a robust network. We listen to our customers and respond to their needs so that they can participate in the new digital economy. "Doing the right thing" is a competitive advantage for us.

Our Approach

We focus on providing an excellent experience for any service and from every single contact and service point, constantly improving our products and services.

Customer Experience Transformation

Excellent customer experience at all contact points is a priority and all processes are designed and implemented to ensure this.

We created two new services in 2021 that immediately respond to the needs of our subscribers in a timely manner:

- The application tracker, which provides information at every stage of the activation of an application for fixed or mobile telephony.
- The ticket tracker, which helps monitor the course of resolution of a fixed telephony technical issue in real time.

At the same time, we developed the WI-FI Genius function, through which users can check the condition of the wi-fi network at the place they are and find suggested solutions for better performance.

In addition, the activation of new prepaid mobile telephony has moved to the digital era. Subscribers have now the ability to apply for a new plan easily and quickly through digital identification and electronic signature.

Customer Experience Transformation continues at a steady pace to be one of the main competitive advantages of Wind Hellas in the field of telecommunications.

The results of the Customer Experience Transformation have been reflected in the relevant corporate operating indicators, such as a decrease in calls to the service centers, a decrease in the average customer handling time, an increase in the resolution of customer issues during the call, etc., thus building a relationship of trust with our customers.

In an even more demanding year, we had steady progress:

In mobile telephony

- More than half of our mobile plan customer base enjoys the W 3GB / W 10GB / W Unlimited GB plans.
- Users making use of data from their mobile phone increased by 18% in one year and data usage was increased by 77% in 2021 compared to 2020.
- Our subscriber base increased by 10%, proving that more and more subscribers trust Wind for their communication, given the fact that we retained the share of subscribers

who use smartphones and utilize data services at very high levels that reach 79%.

- The number of active prepaid F2G users who use myF2G App each month increased to 48% in 2021.
- Respectively, the participation of the online channel in prepaid package activations increased to 49% compared to 40% in 2020.
- In total, data usage per average user increased by 61% in 2021, reaching 3.2 GB.

In fixed telephony and the internet

- We increased the subscriber base by 4.3%.
- We increased the subscriber base on new generation networks above 37%.

In mobile and fixed telephony bundles

- There was a significant increase in households that use convergence services by 11% from 2020 to 2021, reaching 279,015 households.
- There was also a significant penetration of new generation networks in our household base which increased by 24% from 2020 to 2021.

In pay TV

- Wind Vision closed 2021 with 71,000 subscribers.
- It is a pay-TV service with a hybrid (Digital Terrestrial & OTT) Android TV decoder in Greece, based on Google's operating system, that provides access to more than 7,000 apps which are specifically adapted for household TV screens.
- It is a strategic cooperation with international content providers (e.g. Netflix, FOX, Disney, National Geographic, Spotify, Amazon Prime Video, etc.).
- It provides free access to content from up to 4 mobile devices in addition to the decoder and enables simultaneous watching from 3 devices (decoder + 2 additional devices).
- It provides the ability to watch programs on televisions that are compatible with the Chromecast function through the Wind Vision app for Smartphone and Tablet.
- It is the first service in Greece which enables making payments to Netflix without a credit card via the Wind Vision subscriber account.



A historic building “breathes again” through technology.



Wind Hellas' flagship store is housed in the historic building of the Meropeian Foundation. An important building of the past, with more than 100 years of life, opens a new cycle of life through its transformation turning it into one of the greenest stores in the country, incorporating values of sustainable development.

A living example of circular economy

Modern practices were incorporated in the building in order to extend its life and energy upgrade, always respecting its history.

The philosophy of this climate neutral store is based on the calculation of its carbon footprint, namely the quantity of greenhouse gases emitted during its operation, such as the consumption of electricity and the transport of employees.

Wind's new store was certified by the CSE Sustainability Centre pursuant to the international Greenhouse Gas Protocol and ISO 14064 and the data was verified by the respected certifying body First Climate.

A 100% digital space

The new store is located in Kallithea, at 62 Davaki and Aristeidou street, and it is WIND's biggest physical store. Smartphone corners, areas offering the unique experience of watching Wind Vision like a personal Home Cinema, spots where WIND ONE fixed and mobile telephony plans are presented, and a business corner specifically configured for corporate customers are only some of the characteristic areas in the store. The customers can discuss with specialized associates of WIND about the solutions and tools they need in their personal and professional daily life in order to enjoy the new digital reality in more modern ways.



Give me a second chance

We promote circular economy through our collaboration with TCCM and the action “GIVE ME A SECOND CHANCE”, which gives one recycled/remanufactured iPhone 8 64GB device with every new Wind ONE plan.

The action “GIVE ME A SECOND CHANCE” encourages consumers to acquire a new device and contribute to the reduction of pollutants while, at the same time, it ensures that each device is used at maximum capacity for a sustainable planet.

“GIVE ME A SECOND CHANCE” smartphones are subject to a dual inspection of software and hardware and are tried extensively (at more than 40 points) before they are put on sale so that they are as reliable as a new device. Remanufactured/ recycled iPhone 8 64GB devices, with usage quality assurance and in excellent working condition, are sold in a package made of 100% recycled materials, accompanied by all necessary certifications and a 12-month guarantee.

The smartphones which are selected and remanufactured are exclusively grade A. This means that they are 100% functional, have passed successfully all inspections and are in excellent condition, thus ensuring the high quality and reliability of a new device.



Training our partners

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

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

Combined methods are used for the implementation of the training programs to achieve the maximum result. Having already developed digital training since 2018, in 2021 we were able to respond continuously to the educational needs of the channels using the following methods:

- Online classrooms (virtual classrooms)
- Live webinars
- Attendance of electronic courses
- Electronic questionnaires for online knowledge assessment upon completion of each module
- Virtual classroom
- On the job training

During 2021, in all methods mentioned above, 97,507 hours of training were offered to 2,473 professional sales and telephone service representatives of our partners and the company.

Green panda

Aiming at contributing to sustainable growth and encourage circular economy, in 2021 we started our collaboration with GREEN PANDA, which repairs, recycles and reuses materials in order to produce new devices. Through GREEN PANDA ATMs, consumers can sell their smartphone easily, quickly and securely and receive an amount up to 950 euros, which they will use to buy a new device.

It must be mentioned that there is a decrease equal to 60kg of CO2 for each recycled smartphone. This also saves 50g of silicone, 20g of aluminium, 15g of copper, 10g of plastic and 10g of heavy metals which are required to produce a new device. Even in cases of older, zero value smartphones, consumers can use GREEN PANDA ATMs and contribute to responsible recycling, which is a necessary requirement for a sustainable future.

Wind is the first telecommunications provider in Greece that joins forces with GREEN PANDA and offers innovative retail solutions to its clients. Wind stores help significantly in the effort to reduce our environmental footprint and create value in society.



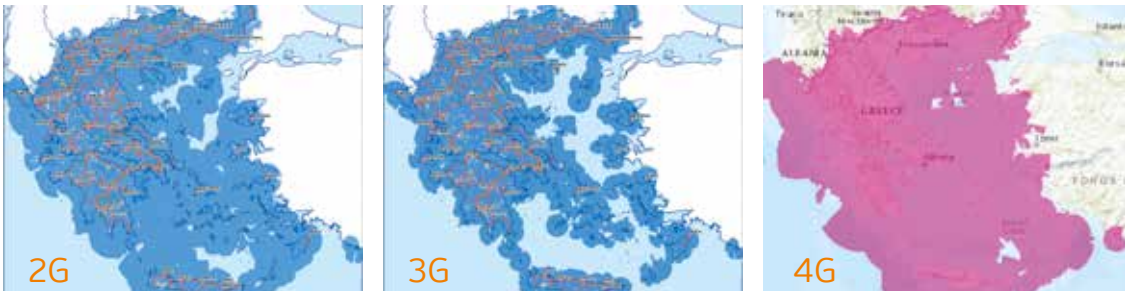
Responsible Network Development

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

2020 input		
The mobile telephony network	In the end of 2020, the population coverage of the network as shown in EETT's report for H2 2020 reached:	2G: 99.4% 3G: 95.2% 4G: 98.1%
	It pertains to the creation of an entirely new radio network that allows nominal mobile broadband speeds up to:	42 Mbps for 3G 300 Mbps for 4G
	At the present project phase, we have completed the modernization of the stations that cover pilotically:	The entire Greek territory without exceptions
	5G Network: In the end of 2021 it was developed in selected areas of:	Attica and Thessaloniki
The fixed telephony network	During 2020, it was expanded to:	0
	Upgraded the connection circuits through backhauling at about:	232 circuit upgrades were performed at 142 fixed stations
	International Capacity:	1290 Gbps
	GR-IX	70 Gbps
	Collocations in Telecommunication Hubs:	328
	Underwater Fiber Optic Cables between:	Greece - Italy Crete - Peloponnese Peloponnese - Central Greece
	With regard to VDSL coverage, Wind Hellas has reached urban centers by the end of 2020:	236 urban centers
	By the end of 2020 the NGA FTTB/FTTC/FTTH infrastructure installation had been completed:	FTTC: 1985 KVs FTTH: 37 KVs (4 KVs Kalamata, 20 KVs Larisa, 13 Kerameikos) FTTC-FTTH: 300,153 subscribers FTTC AREAS: Kalamata, Almyros, Akadimias Lar, Fillelinon Lar, Thouria, Kalithea, Piraeus, Nikaia, Korydallos, Keratsini, Agia Varvara, Haidari, Egaleo, Larisa, Pavlou Mela Thess, Nea Varna Thess, Ampelokoipi Thess, Ilion, Kermeikos, Kyparissia, Loutraki, Mandra, Nea Peramos, Rafina
E/M Radiation & Measurements	In 2020, WIND carried out measurements either in the context of the licensing of Base Stations or at the request of citizens:	In 2020, 10 E/M measurements were made at Wind Hellas' stations either by the Victus laboratory or by University Institutions upon assignment by us

Population coverage

2020 mobile network coverage maps



2021 input		
The mobile telephony network	In the end of 2021, the population coverage of the network as shown in EETT's report for H2 2021 reached:	2G: 99.4% 3G: 95.2% 4G: 98.1% 5G: 36%
	It pertains to the creation of an entirely new radio network that allows nominal mobile broadband speeds up to:	42 Mbps for 3G 450 Mbps for 4G 1.7 Gbps for 5G
	At the present project phase, we have completed the modernization of the stations that cover pilotically:	The entire Greek territory without exceptions
	5G Network: In the end of 2021 it was developed in selected areas of:	Attica, Thessaloniki, Chalkidiki, Patra, Kalamata, Trikala, Volos, Ioannina, Larisa, Lamia, Xanthi, Chalkida, Alexandroupoli, Cyclades (Paros/Naxos/Santorini), Crete (Iraklio/Chania), Rhodes (total stations in Greece - 600 stations)
	Cellular IoT Network (LTE-M /NB -IoT): In the end of 2021 it was developed in selected areas of:	Attica, Thessaloniki (stations in total ~45)
The fixed telephony network	During 2020, it was expanded to:	LLU/RSS
	Upgraded the connection circuits through backhauling at about:	93 circuit upgrades were performed at 70 fixed stations
	International Capacity:	2290 Gbps
	GR-IX	210Gbps
	Collocations in Telecommunication Hubs:	328
	Underwater Fiber Optic Cables between:	Crete - Peloponnese Peloponnese - Central Greece
	With regard to VDSL coverage, WIND Hellas has reached urban centers by the end of 2021:	238 urban centers
	By the end of 2020 the NGA FTTB/FTTC/FTTH infrastructure installation had been completed:	FTTC: 64.584 lines (Koleti, Solonos, Patisia, Kolonos, Filelinon, Keramikou, Akadimias, Kalamata, Rafina A) FTTC-FTTH: 422.633 subscribers FTTC ΠΕΠΙΟΧΕΣ: Kalamata, Almyros, Akadimias Larisa, Fillelinon Larisa, Thouria, Kalithea, Nikaia, Korydallos, Keratsini, Agia Varvara, Haidari, Egaleo, Larisa, Pavlou Mela Yhess, Nea Varna Thess, Ampelokipoi Thess, Ilion, Kerameikos, Kyparissia, Loutraki, Mandra, Nea Peramos, Rafina A, Knossos, Therisos, Patisia, Kolonos, Karolos, Tyrnavos, Solonos, Forteza, Ariadni, Gazi, Amaliada, Megalopoli, Perigiali, Kiato, Velo, Vrahati, Nea Kios
E/M Radiation & Measurements	In 2021, WIND carried out measurements either in the context of the licensing of Base Stations or at the request of citizens:	In 2021, 8 E/M measurements were made at WIND stations either by the Victus laboratory or by University Institutions upon assignment by us

Population coverage

2021 mobile network coverage maps



Benaki Museum

The first 5G Museum in Greece

We digitally transform the cultural landscape and the way the public experiences art and history.

Wind Hellas offers to the visitors of Benaki Museum the ability to connect through wifi, free of charge, to WIND FIBER, a new generation fiber optic network, with speeds reaching 200 Mbps. Thanks to the possibilities offered by the new generation fiber optic network WIND FIBER, the visitors of the museum can experience a unique experience of art and history through virtual experiences and augmented reality productions.

The Benaki Museum digital transformation project by WIND Hellas began at the iconic building at 138 Pireos street and the Museum of Greek Culture and it will eventually be extended to the other buildings of the museum. It must be noted that the average number of visitors at the branches of Benaki Museum who can browse and admire thousands of exhibits from the whole world exceeds 500,000.

Wind Hellas, as an integrated communication and technology service provider helps in the effort to digitally transform the country and contributes to a project that offers new possibilities in the field of culture. Through this collaboration, the company digitally transforms the cultural landscape and the way the public experiences art and history and makes technology an ally for the cultural product of Greece.



More than 4,000 doctors around the world watched live an innovative operation through Wind HELLAS optical fibers.

Wind Hellas, as the exclusive telecommunications provider of Metropolitan General and other hospital establishments of the Hellenic Healthcare Group (HHG) provides a high-speed optical fiber for the transmission of the innovative Endoscopic Submucosal Dissection (ESD) technique. Through the new generation network of Wind Hellas, an endoscopic excision of early gastric cancer was carried out using the Endoscopic Submucosal Dissection (ESD) technique and streamed live through the largest global online endoscopic event platform, Endoscopy on Air (endoscopyonair.com) and watched by registered gastroenterologists from all over the world.



Promoting Sustainable Development

Internet of Things

We utilize the new IoT technologies with the purpose to offer products and added value that not only make the daily operations of businesses easier but also have a positive impact on society. These technologies are applied to many different sectors of business activity and create a new business ecosystem. Some applications of these technologies are Telemedicine, Retail Trade, Agriculture, and Smart Cities.

CLOUD Services

WIND ONE Pro

Supporting the increased need for remote working and the provision of actual business continuity to organizations, we created the new cloud telephone center and collaboration functions service Wind ONE pro (video and audio conferencing, chatting, file sharing). Through the new service, employees can access all corporate applications from their mobile phone or tablet, wherever they are. The new cloud service offers a productive and excellent user experience to employees, while it reduces operational costs of companies and pollutant emissions from the transport of employees to and from their place of work.

NarrowBand Internet of Things (NB-IoT)

With the NarrowBand Internet of Things (NB-IoT) network we offer customized solutions to all organizations and businesses that want to implement their digital transformation immediately, supporting the ecosystem of applications and services created for smart cities. NB-IoT technology is specialized for Internet of Things applications and provides important technical and financial benefits so that these applications achieve significant economies of scale.

5G Stand Alone (5GSA) for robotics applications

In collaboration with Myrmex Inc. (Material Handling Robotics), Wind Hellas implements for the first time in Greece the next generation of 5G Stand Alone (5GSA) networks for robotics applications. This is the first fifth generation network in our country that uses this technology and its state-of-the-art network architecture.

5GSA technology is necessary to provide high bandwidth, latency and high reliability, which are necessary elements for the proper and secure operation in 4.0 Industry, sectors which the fifth-generation networks will radically reshape in the coming period.

WIND Fleet Management

The WIND Fleet Management service offers the ability to companies, professionals, public organizations, private

organizations and institutions that manage vehicle fleets and means of transportation to reduce their operating costs, better allocate their resources and increase their safety and productivity by improving their operations and processes. In this context, they achieve significant reduction in the carbon footprint of their business.

With respect for the environment

Used packages and equipment are recyclable and bear the relevant CE marking and any additional certification required for their safe use by consumers, as required by the relevant Greek and European legislation. Moreover, we are improving the functionality, usability, appearance, speed and the tools of wind.gr to avoid calls and visits for information. Finally, we promote saving money on paper for bills and envelopes by using e-bill.

Responsible Mobile Telephony Services

Protection of Minors

With respect to the multimedia information services, we strictly adhere to the regulations on the protection of minors during phone usage. Regarding the 901 and 909 lines we have, as well as the five-digit SMS, the owner of the account (adult) can request us to block them by a phone call or written communication.

Responsible Marketing

The programs we provide are in accordance with the regulations and optional codes on communication and marketing, aiming at providing the client with complete information about the benefits of our products and services. We ensure that our communications and promotional material are consistent with the provisions of the Hellenic Code of Advertising-Communications (EKD-E), the provisions on unfair competition and consumer protection and the applicable Greek legislation in general. We stay up to date and strictly adhere to the regulations/guidelines of the Hellenic Communications Control Council (S.E.E.). In 2021, no appeal was lodged against Wind Hellas regarding anti-competitive behaviour and violations of anti-trust and monopoly legislation.

Communication Principles

Driven by our commitment to the subscriber and the best service experience possible, we have established three basic communication principles that govern the way we operate:

Responsibility

We support clear and transparent communication of products and services through every channel of promotion. The websites (wind.gr, F2g.gr, myQ.gr), and our applications (myWIND app, myF2G app, myQ app) are key channels of service and communication with consumers, making the process of obtaining information on our products and services easy, simple and fast.

Acknowledging the right for equal access to WIND’s services, we incorporated a widget application on our websites with accessibility functions for people with visual and hearing impairment and cognitive dysfunction.

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

Directness

We continue to invest in a 360-degree communication strategy, maintaining multiple marketing channels for our products and selecting direct and clear ways of promotion. We continue to support online communication and provide integrated online experience to all users through all means.

This year we added to the already existing promotion channels for our products two new digital communication channels, such as the Viber app, as well as in-app messages in our applications, which further built customer experience and have offered new potential. We also offer instant service, fast access to information, as well as easy purchase of services and products through our e-shop (WIND eShop), our apps “myWIND App”, “myF2G App” and “MyQ App”, and our pages on social media (Facebook, Instagram, LinkedIn and Twitter).

The convenience of communication of users with Wind Hellas was enhanced significantly through the provision of digital service points, such as Online Chat for service and sales, which can be accessed through our websites (wind.gr, business.wind.gr, F2g.gr, myQ.gr) and apps “myWIND App”, “myF2G App” and “MyQ App”, making communication easier for our existing and prospective Consumer/Business customers.

Furthermore, the creation of an Online Help Hub with answers to frequently asked questions of consumers per topic contributed to an integrated online support to users through direct access to the information that interests them. Finally, myWIND app became faster and was enriched with new functions in order for consumers to enjoy the best experience at any time.

Honesty

We ensure that our communication is consistent with the principles of fair competition, complying with the Hellenic Advertising and Communication Code. Our goal is to build relationships of trust with existing and potential subscribers. This is why we invest in information campaigns that gain public acceptance, reflect all product information with clarity and are not contrary to the Hellenic Advertising Code.



Codes of Conduct

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

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

In addition, our company fully applies and binds third contractual parties offering Multimedia Information Services on the application of any codes pertaining to child protection issues, namely:

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

Intellectual Property, Copyright and Related Rights, Privacy of Communication and Personal Data

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

In addition, we have signed contracts and/or negotiated with domestic Collective Copyright and Related Rights Management Organizations regarding payment of their royalties depending on the activities of the company and the taking of joint action in order to inform consumers and raise awareness of internet piracy and the subsequent damage suffered by owners of copyright, which is internationally recognized as a human right.

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

Personal Data

We pay great attention to the protection of personal data of our subscribers, employees and partners, by strictly applying the current legal framework on privacy and personal data protection. To this end, we have taken appropriate technical and organizational security measures, apply Personal Data Protection Policies and have appointed internally a Personal Data Protection

Officer pursuant to the General Data Protection Regulation (GDPR).

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

Customer Satisfaction

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

CSAT Customer Satisfaction Survey

In the scope of reinforcing our customer-focused philosophy, we try to improve daily the procedure for recording subscriber service experience after the completion of telephone communication with the Customer Service Department. The purpose of this procedure is to ensure and improve the quality of the services offered. The customer satisfaction survey (CSAT) continued in 2021 and revealed a high level of interest and the company's commitment toward its customers. The percentage of subscribers who responded to the



question “How would you describe your overall experience from your Call Service?” that the telephone service they received from the Mobile & Fixed Telephony Customer Service Departments was “Excellent” and “Satisfactory” (CSAT) for 2021 was 91.86%.

In addition, we evaluate the NPS (Net Promoter Score), which exports the percentage of customers who are willing to recommend the product or services they use to third parties. This score was 64.95% for 2021.

“Knowledge Base” Information Management Platform

Taking into account the constantly changing environment and the rapid developments in the telecommunications sector, we believe that it is necessary to ensure daily and direct provision of information to the Customer Service Department.

Within the context of strengthening customer experience and in combination with ensuring the timely and valid provision of information to all Customer Service Departments, the new information platform/knowledge base called “SABIO” was put in place.

All customer contact points (inbound Call Centers, Back Office and Technical Support) are informed through a common platform, thus ensuring homogeneity in terms of service, communication and provision of information to the customer. SABIO is a work tool that forms an integral part of the work of agents and contains all the necessary information regarding:

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

The main features of the platform are its analytical structure, its user-friendly look and feel environment and its fast search engine. In addition, SABIO is the first application in a cloud environment outside the company. The total number of users is 1,800 and the updates/ instructions currently posted are 2,225.

Responsible Procurement

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

Using specific forms, general conditions of cooperation and/or individual procedures, we expect any supplier who is interested in joining the list of suppliers that work with our company to comply with the obligations

pertaining to its business activities that arise from national and European legislation and to avoid any unfair or 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 department, transparency and prevention of any incidents of corruption in relation with it, the selection and evaluation

of our suppliers, tenders and daily procurement activities are carried out on the basis of detailed, documented and formal procedures that respect human rights and are consistent with the principles of transparency, providing for specific procedures, controls and approvals.

Supplier Evaluation

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

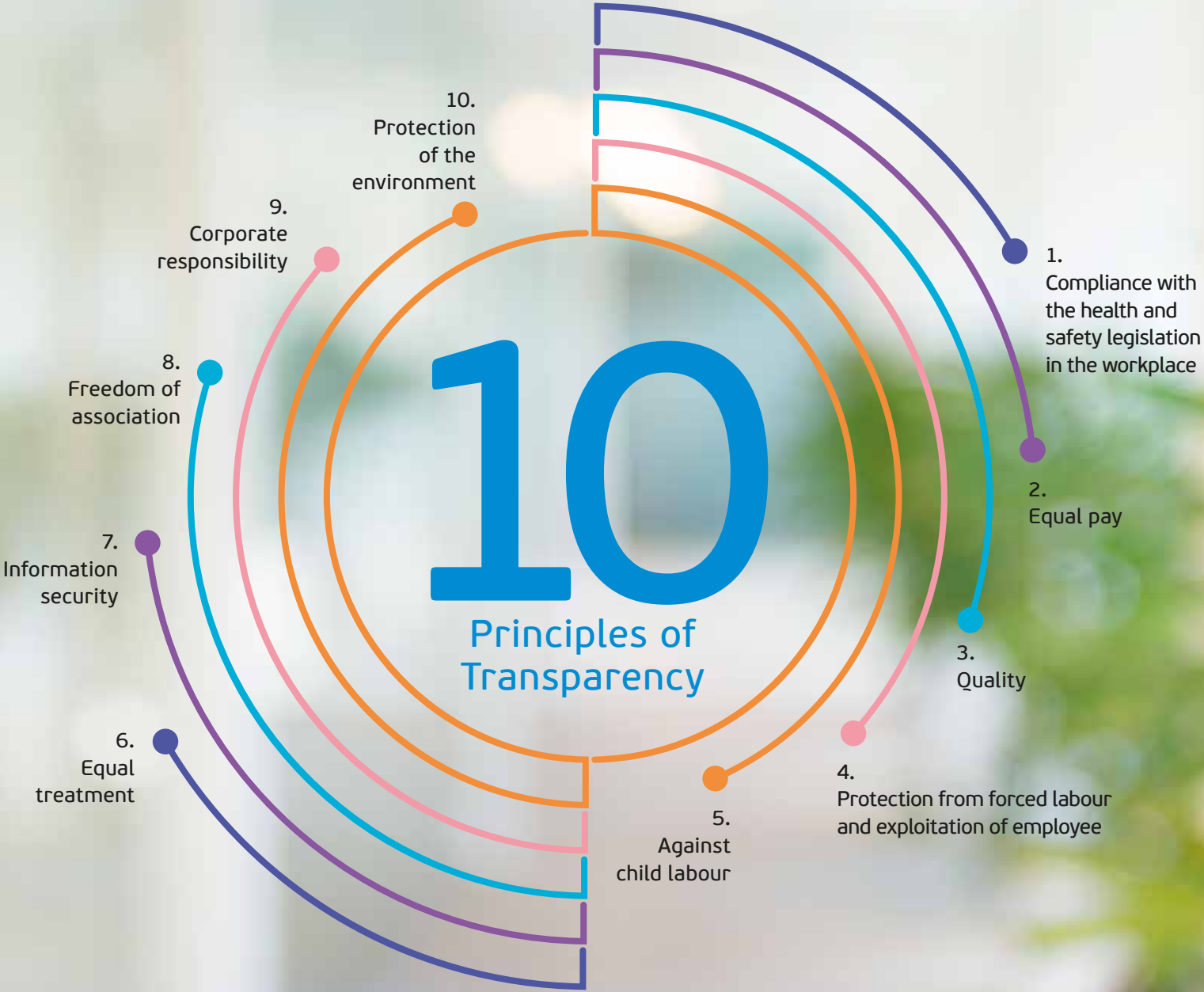
In 2021 and in the context of promoting Corporate Responsibility in our supply chain, we continued sending the “Wind Hellas Code of Conduct” to all new suppliers, having set the acceptance of the code as a necessary condition for cooperation. In any case, the acceptance of the General Procurement Conditions, the Confidentiality Agreement and the Code of Conduct, as well as the completion of questionnaires related to the business activity, are only some of the main requirements for the inclusion of a new supplier in our base.

We evaluate our suppliers in accordance with the requirements of the management systems under ISO 9001 and ISO 14001, monitor tenders and perform inspections when deemed appropriate. In 2021 we evaluated our 74 most important suppliers. Out of them, 65 suppliers were found to fully meet the corporate performance criteria, while in 9 cases it was found that further monitoring was required, and thus we proceeded to all necessary actions, taking all necessary measures.

Support of local communities

We try to support local markets mainly with respect to contractor/building projects, where we use companies of each region where possible. In principle, we use Greek companies for the purchase of promotional material and printing works.

The expenses paid to local suppliers (Greek companies) were approximately 92.4% of WIND’s total expenditure for 2021. The majority of expenses paid to non-local suppliers concerns purchases of telecommunication products of which the manufacturer is not represented locally in Greece.



ENVIRONMENT

ENVIRONMENT

We monitor and manage the impacts of our operations through our policy and the implementation of the Environmental and Energy Management System minimizing our impact on the environment.



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

Table 1: Significant environmental impact from our operations				
Issue	Environmental Impact	Response	Objective 2020-2021	Result
Energy Consumption / Direct and indirect emissions of pollutants	Depletion of natural resources, atmospheric pollution, contribution to climate change and atmospheric acidification.	Carrying out energy audits and identifying energy saving opportunities. Preparation of a long-term action plan, with a focus on energy savings in buildings and increasing use of renewable energy sources.	Reduction of energy consumption by at least 5% in buildings. Implementing actions that increase the efficiency of data centers. Market research for possibilities to procure energy with guarantees of origin from Renewable Energy Sources (RES).	Reduction of electricity consumption in buildings by 3% compared to 2020 and 21% in total from 2015 to 2021. We already have guarantees of origin available for 25,840MWh.
Refuse and waste management	Depletion of natural resources, creation of pollution, landfill saturation.	Actions aiming at avoiding, reducing, reusing, recycling the waste produced.	Increase in paper savings from the increase of registered subscribers to My Wind / E-bill online services. 100% recycling of all hazardous waste.	The percentage of customers using the e-Bill service in December 2021 was 62.4% 100% recycling of hazardous waste
Electromagnetic emissions	Atmospheric pollution	Impact assessments, emission assessments and emission measurements upon request, compliance with limits and standards set by international organizations, EU, Greece, etc.	No limit overrun by individual base station ¹ .	In 2021, 2,572 inspections and on-the-spot measurements were carried out at base-antenna stations throughout Greece, out of which 83.24% was carried out at mobile telephony antenna stations and the remaining percentage was carried at radio and television antenna stations. According to the cumulative results of the measurements, one possible excess was found, which was created by the construction of an adjacent taller building after the licensing of the station. All required actions for compliance of the station were taken immediately. This was confirmed at a later inspection carried out by the Greek Atomic Energy Commission (EEAE). Other violations included in the EEAE report pertain to a competitor company and an antenna park.

There were no significant pecuniary or non-pecuniary penalties for 2021 in relation to Environmental law. Environmental protection costs (compliance with the obligations of producers under Law 2939/2001, as well as ISO certifications for environment, energy) ranged at 6.1 thousand euros for 2021.

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

Climate, Energy and Energy Management

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

At the same time, we monitor direct and indirect emissions of pollutants (translated into carbon dioxide equivalent) from all sources, and with a focus on the long-term target for zero carbon emissions. In this context, in 2021 we created the **second climate neutral store of Wind Hellas chain of stores** and within the next five years we aim to increase the number of stores that will be climate neutral.

Acknowledging the importance of green electricity, free from carbon dioxide and other greenhouse gas emissions as much as possible, we evaluate our own potential for electricity generation from RES in our buildings and we are exploring the market for the possibility of procuring energy with guarantees of origin through DAPEEP (former LAGIE, Operator of RES & Guarantees of Origin). We have already verified procurement of 25,840MWh with guarantees of origin. Our goal is to purchase in 2022 guarantees of origin from RES for 100% of our billed electricity from our providers.



FIGURE 1: Energy Consumption Allocation 2020-2021 (%)

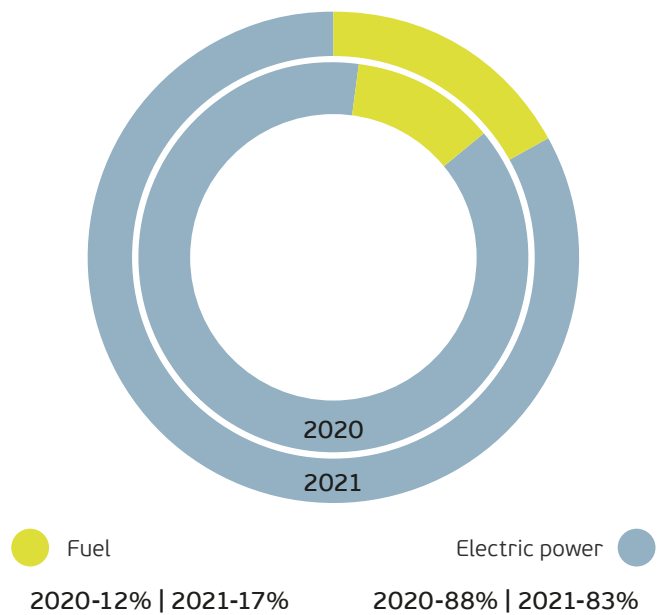
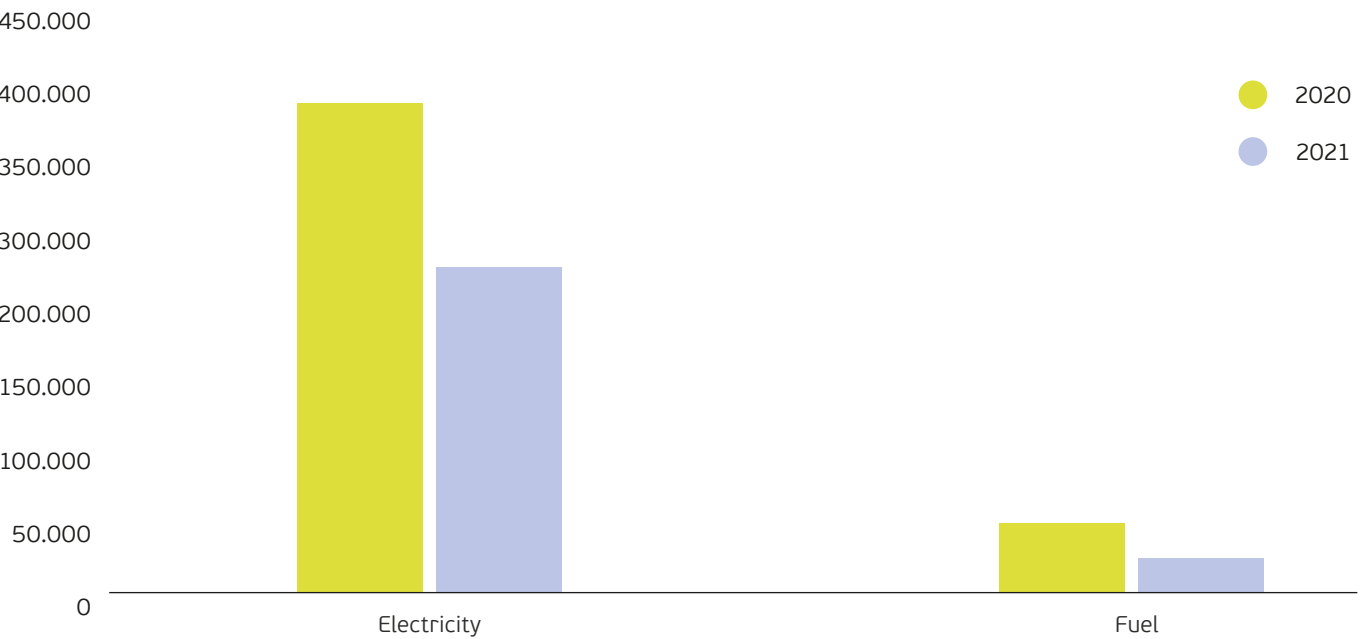


FIGURE 2: Energy Consumption 2020-2021 (GJ)



For the third consecutive year we achieved a further reduction of consumption in telecommunications and office buildings. Consumption was reduced by 3% from 2020 to 2021. The reduction is the outcome of our five-year implementation of interventions aimed at increasing the efficiency of data centers and other installations and equipment (electromechanical premises, air conditioning, lighting, heating, etc.).

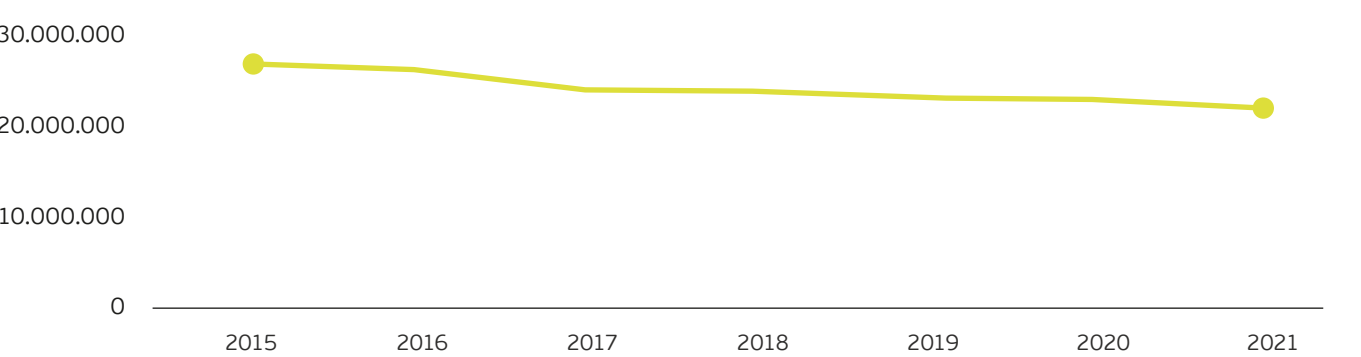
Total Energy Consumption

The majority of the energy we consume is electricity from the national grid, but we also use diesel, heating oil, and gasoline for vehicles. The total energy consumed in 2020 amounted to 440,184 GJ, including fuel for the vehicle fleet, while in 2021 the energy consumed was 305,032 GJ².

For 2021, the electric power consumed was approximately 83% of the total quantity of energy.

The efficiency of the energy used (energy intensity), expressed as units of energy consumed in relation to the total annual revenue, was 0.8433 GJ/thousand euros for 2020 and 0.5523 GJ/thousand euros for 2021.

FIGURE 3: Evolution of Electricity Consumption in Buildings 2015-2021.



²Does not include the chain of stores but solely services invoiced under Wind Hellas's.

Identifying opportunities

In 2018, we conducted energy inspections in all telecommunications centers, our offices and the mobile telephony network.

The inspections were carried out by independent and experienced energy inspectors, identifying opportunities to improve efficiency and energy savings. The resulting action plans have been incorporated into our planning and will be implemented gradually starting in 2022 in our buildings, with the purpose to save an additional 10% compared to the starting conditions.

Independent energy inspections will be repeated in 2022. We will also promptly draft a plan for energy improvements to our premises.

In addition, we continue to optimize the use of installations, even reducing their number where technology allows us to reduce our footprint. In this manner, in the long run, we also plan to reduce the number of data center facilities. These projects will lead to additional energy savings.

In 2021, the evacuation of a facility in Thessaloniki was completed and we plan to evacuate one more facility in Athens.

Fuel consumption

FIGURE 4: Energy Consumption – Use of Fossil Fuel (%) 2020-2021

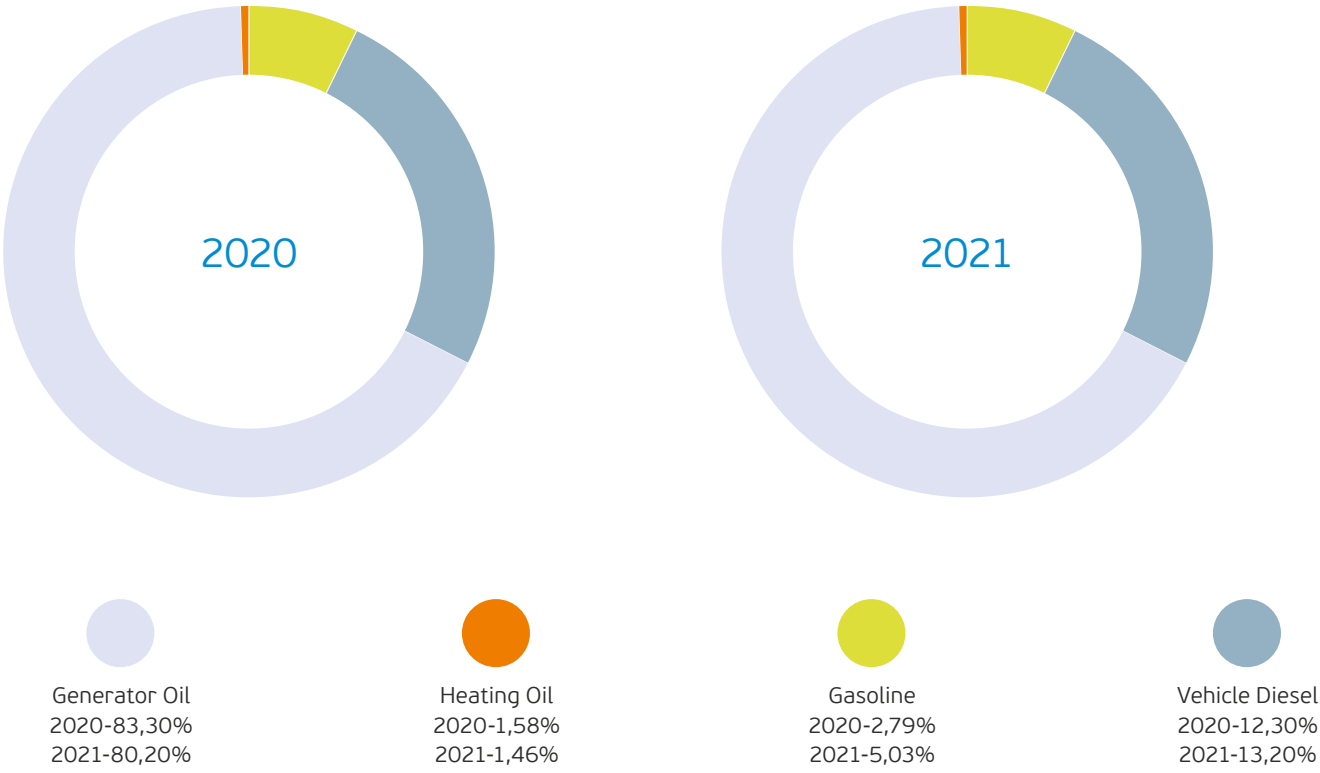
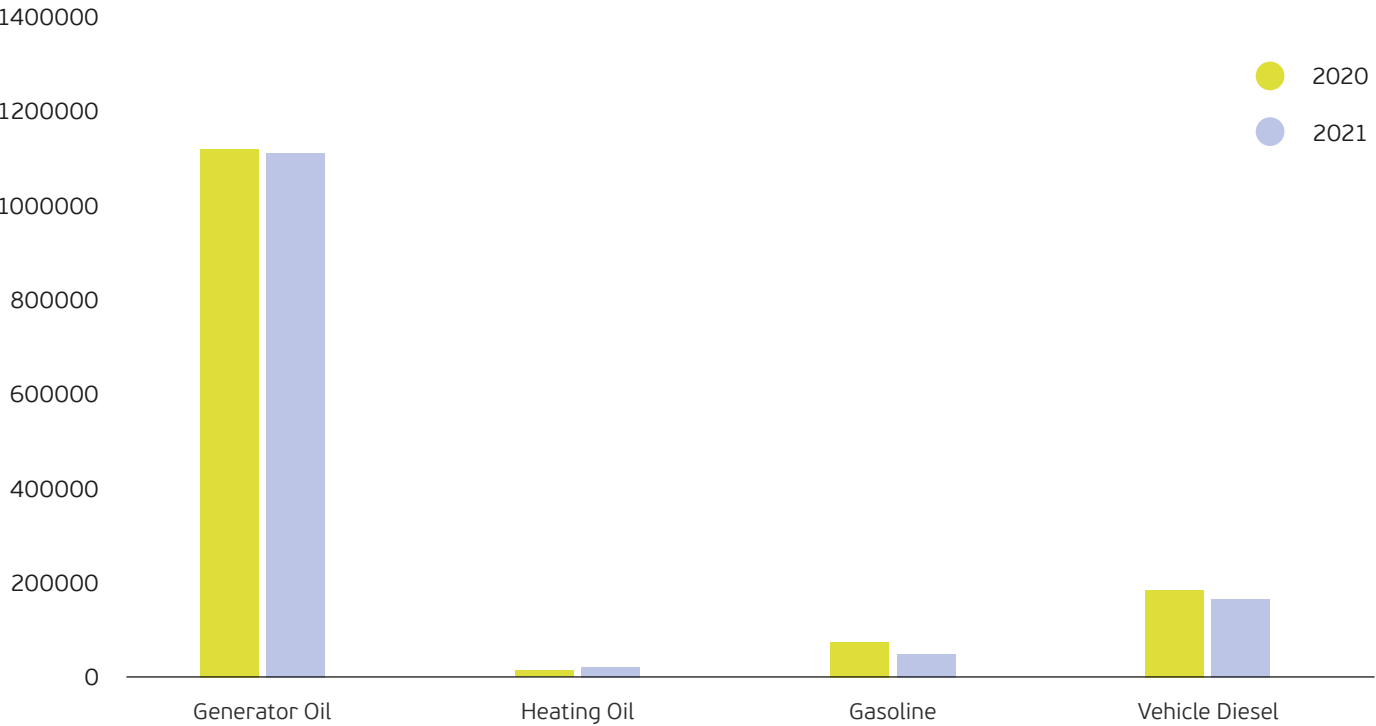


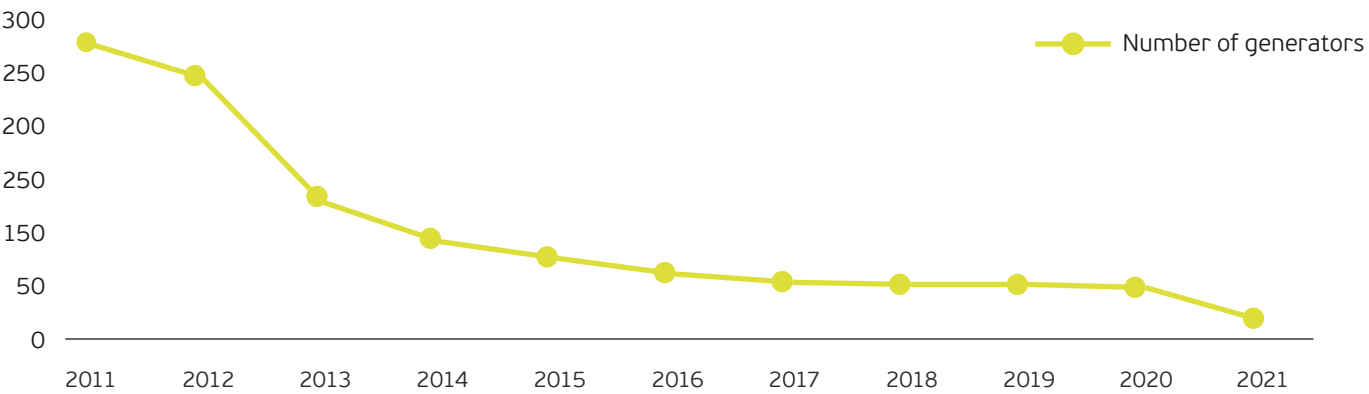
FIGURE 4.2: Energy Consumption – Use of Fossil Fuel (Lt)



In 2020 we consumed a total of 1,461,502 liters of fossil fuel, broken down as shown in Figure 4. In 2021 we consumed 1,394,359 liters in the same uses. There is an increase in heating oil. There is also a significant decrease in gasoline. Also, 2021 there was a decrease in the use of vehicle diesel. The vast majority of fuel consumption is still due to the operation of back-up power gensets, as well as the limited number of stations operating without access to a power grid. Out of these, 75% operates with a hybrid power-generating system based on circular operation of a diesel engine and a battery pack. During the operation of the diesel engine, the accumulators are

charged and electrify the station for the remaining half of the time. This reduces diesel consumption at these stations by half. At the same time, there is a constant effort to interconnect remote stations to the electricity grid. In the last decade, the number of stations operating exclusively with a generator has decreased by 95% (from 281 generators to just 15 in 2021), resulting in a decrease in fuel consumption and pollutant emissions. The use of fuel in backup generators depends on the number of failures/interruptions of the electricity grid each year.

FIGURE 4.3: Number of Generators and Oil Consumption



Vehicle fleet

With respect to the corporate vehicle fleet, a total of 267,201 liters of fuel were consumed in 2020 and 210,629 liters in 2021, out of which approximately 19% was unleaded gasoline and the remaining quantity was diesel. This percentage was 28% in 2020. The (annual) consumption per vehicle stood at 1,183 liters in 2021, decreased by about 270 liters per vehicle compared to 2020. Total fleet emissions for the year 2020 were 685.33 tonnes CO₂e and for 2020 551.25 tonnes CO₂e³.

Pollutant emissions

The emissions of pollutants that we monitor and record result from electricity consumption, fuel use and leakage of refrigerants. We include all Wind Hellas facilities except the chain of stores. Total emissions of pollutants were 110,692 tonnes of carbon dioxide equivalent in 2020 and 76,264 tonnes in 2021, showing a decrease by 32%. The decrease is due to the extended mode of operation of the company during 2021, with universal remote working for more than 4 months, 20%-30% presence in the buildings for approximately four months and 50% presence in the buildings for approximately three months. This excludes emissions from electricity consumption for which we use the recommended coefficient by the Ministry of Environment and Energy, as published in the Guidelines for Energy Inspections.

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

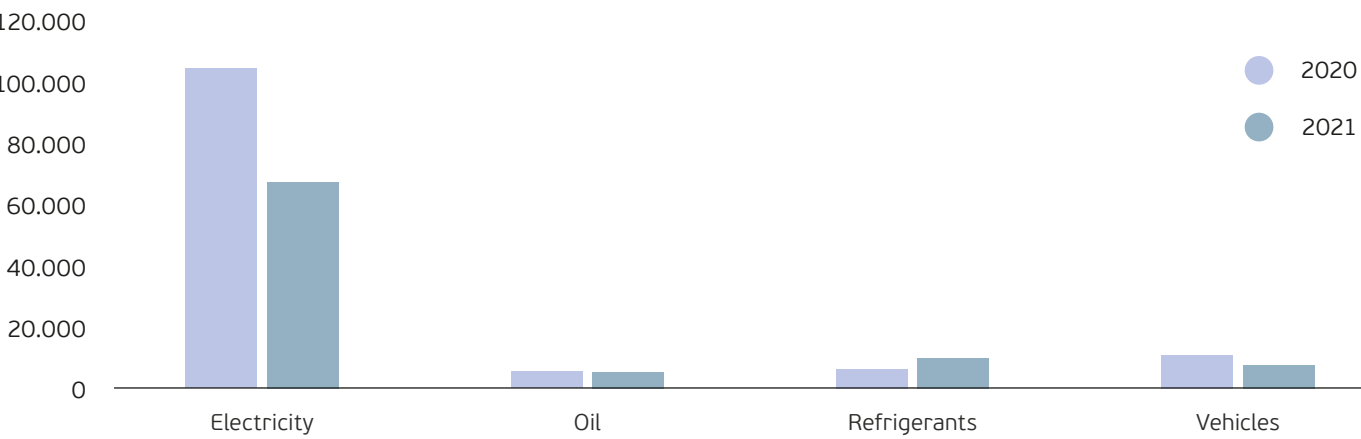
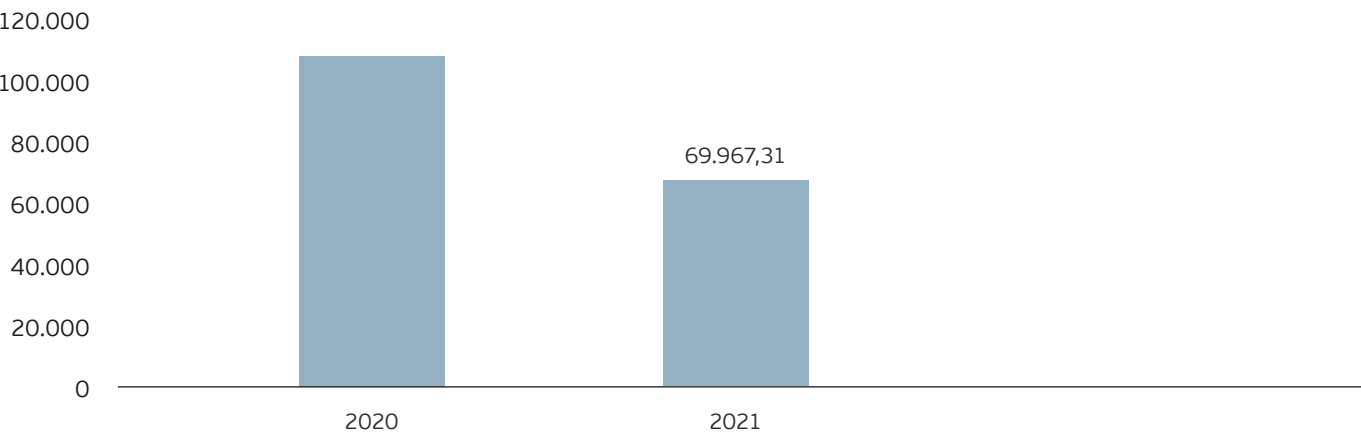
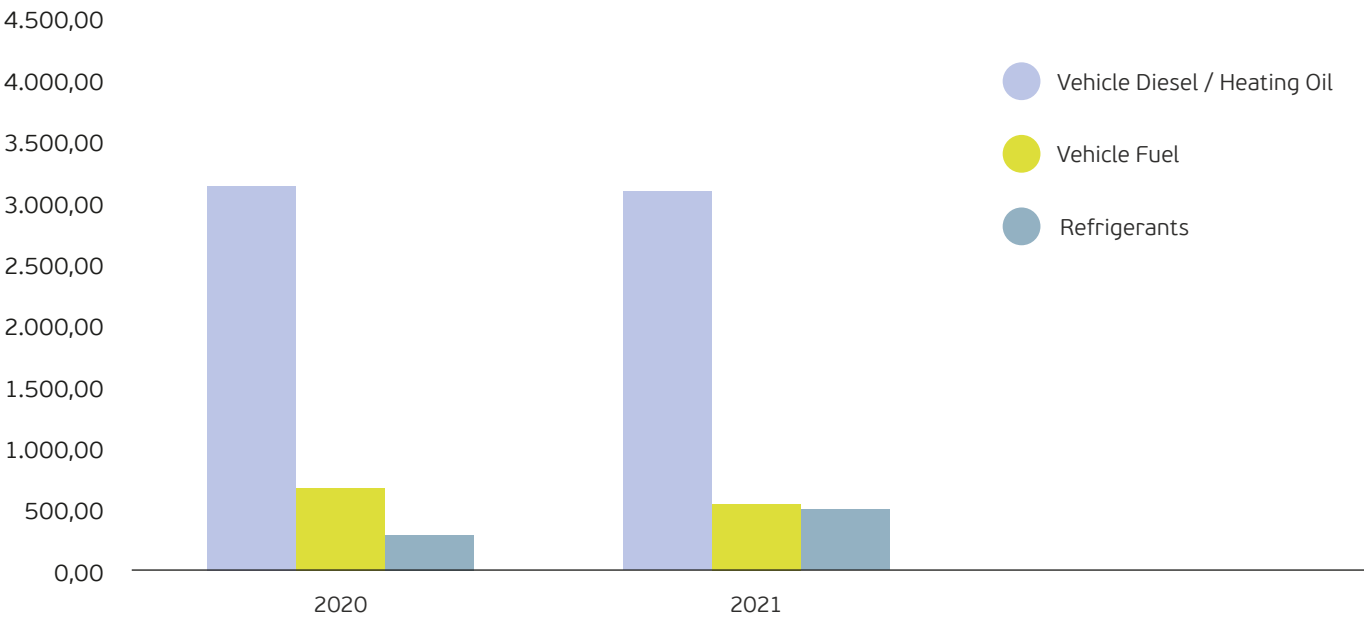


FIGURE 6: Pollutant emissions (tnCO₂e) 2020-2021/ Electricity



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

FIGURE 7: Pollutant emissions (tnCO₂e) 2020-2021 (without electricity)



Ozone Depleting Substances (ODS)

The operation of air-conditioning machines results in hydrofluorocarbon emissions with a particularly high global warming potential (GWP), although they have zero ozone depleting potential (ODP). Considering that the quantity in the circuit of each machine can potentially leak into the environment, we consider this quantity as atmospheric burden in carbon dioxide equivalents and we add it to our overall footprint. To calculate the burden, we use IPCC (Intergovernmental Panel for Climate Change) data⁴.

In order to reduce the burden from this category, we apply a continuous monitoring and maintenance program, and, if necessary, we replace our old air conditioning machines with newer ones, which present fewer failures and leaks. The total burden due to leaks was 293tn CO₂e for 2020 and 538tn CO₂e for 2021⁵.

Electromagnetic Radiation

At Wind Hellas we have adopted a responsible approach with respect to monitoring and measuring electromagnetic radiation levels. During the installation, operation and checking of our network operation, we comply with all international safety standards as well as the guidelines of Greek legislation. We recommend to the general public to address only competent bodies and receive information from the communication material, which they issue specifically

- Brochures on mobile telephony and health
- The World Health Organization (WHO) Newsletter
- Websites of the Hellenic Observatory on E/M Fields with available measurement results on interactive maps

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

(4) GWP IPCC 100y
http://www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-2.html
http://www.ipcc.ch/ipccreports/tar/wg3/index.php?idp=144)
(5) Under calculation at the time of writing of this report.

Waste Production and Management

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

The main categories of waste produced are packaging waste (paper, wood, plastic), electrical and electronic equipment waste, accumulators and batteries and mixed (urban type) waste which are carried to landfills. In addition, excavation, construction and demolition waste (ECDW) is produced from network upgrade/expansion works or the dismantling of old stations.

The management is carried out by disposal to licensed recycling facilities through a network of partners and/or relevant collective management systems.

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

Collective Waste Management Systems

Collective System	Type of Waste
AFIS (Recycling of Waste Portable Batteries)	Small batteries
Appliances Recycling S.A.	All types of electric and electronic equipment
Combatt S.A.	Big batteries, accumulators
SY.DE.SYS S.A.	Big batteries, accumulators
E.P.E.N.DI.SYS (RE-BATTERY)	Big batteries, accumulators
Fotokiklosi	Lighting equipment, light bulbs, light fixtures
HELLENIC RECOVERY RECYCLING CORPORATION - EEAA	All product packaging

Waste management in 2020 was 157.2 tonnes, whereas in 2020 it was 2,583.7 tonnes, having increased significantly due to the production of construction waste.

Hazardous/Non-hazardous Waste

Excluding excavation waste, the production of waste was higher in hazardous waste (107.2 tonnes in 2020 and 197.4 tonnes in 2021) than in non-hazardous waste (50.1 tonnes in 2020 and 34.3 tonnes in 2021). There was a significant increase in battery management in base stations and buildings (excluding excavation materials, which increased significantly). As regards ECDW (excavation and demolition waste), part of the generated materials is reused for filling openings and other materials are made available to the facilities of the competent Collective Management Systems for recycling and utilization. There was no ECDW in 2020, whereas 2,352 tonnes were generated in 2021. In 2021, 27 tonnes in total were carried to landfills compared to 30.72 tonnes in 2020. **The total (100%) of hazardous waste is recycled**, exclusively in facilities in Greece, with the help of appropriately licensed partners/collectors.

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

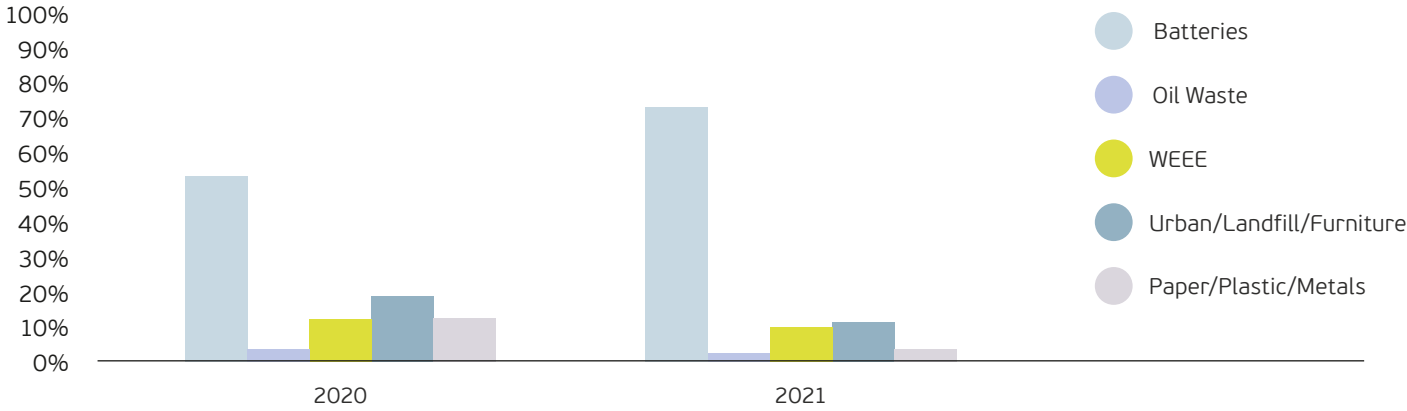
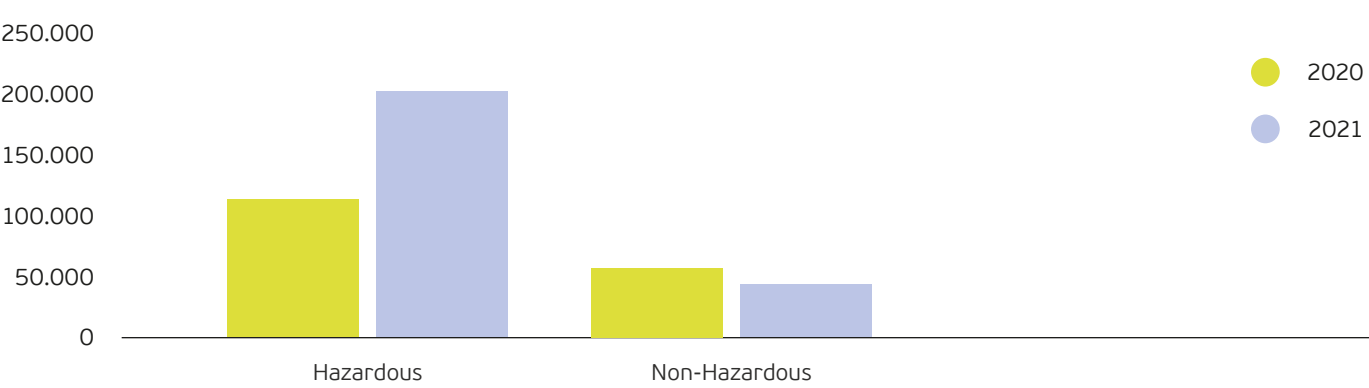


FIGURE 9: Distribution by Type (Hazardous/Non-Hazardous)



Reduction of Paper Use

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

Internal Environment

- a) Centrally programmed double-sided printing on all computers and the option to scan documents, with an accompanying recycling program (bin at each printer, on each floor, in every building).
- b) Reduction of printers and photocopiers at central premises (Athinon Avenue and Paiania) to 45% with a corresponding reduction of printed pages to 30%.
- c) Intranet offering the ability to manage solely electronically documents and processes (no printing required at any stage), electronic approvals and digital signatures.
- d) Payroll issued electronically.
- e) E-bill to all employees.
- f) Electronic system for managing employee assessments.

Stores - Partners - Suppliers

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

Subscribers

- Provision of e-bill/e-services to subscribers for easy, fast, secure, and paperless bill management, as well as other services from any device. Increasing the number of registered subscribers is our fixed goal every year.
- Digital stores that offer a unique experience of technology and service to consumers, and a better environmental

profile, fully incorporating the capabilities of digital technology and eliminate the use of paper and prints for display and advertising purposes to a large extent, saving more than 150 tonnes of paper annually.

Employees

The paper consumption index per employee remained relatively stable pursuant to the orders made in 2021 compared to the corresponding values for 2020. It must be noted, though, that in the end of 2021 there was stock available from the orders made in that year, confirming the anticipated reduction of photocopier and printer use in the buildings.

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

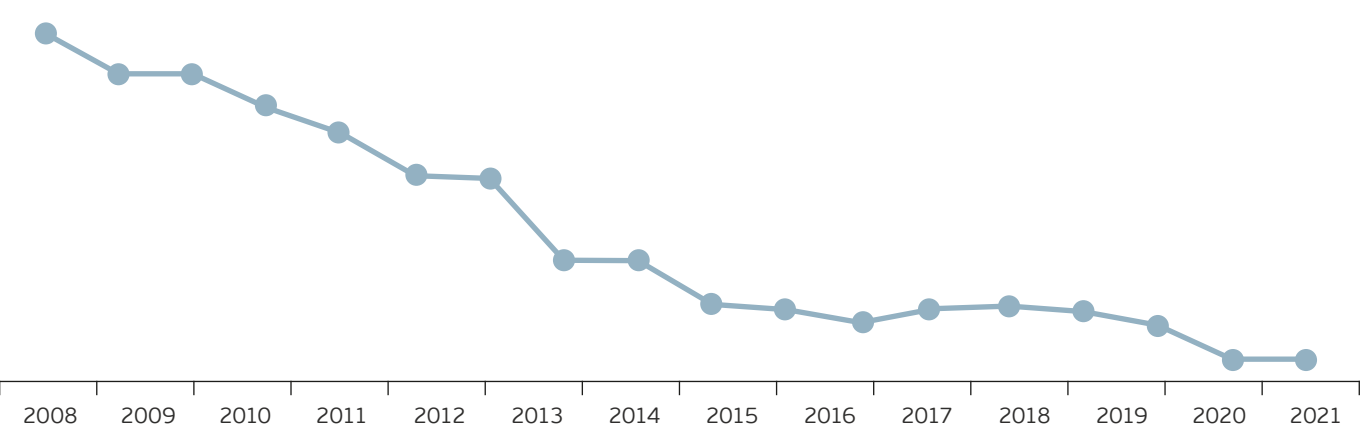
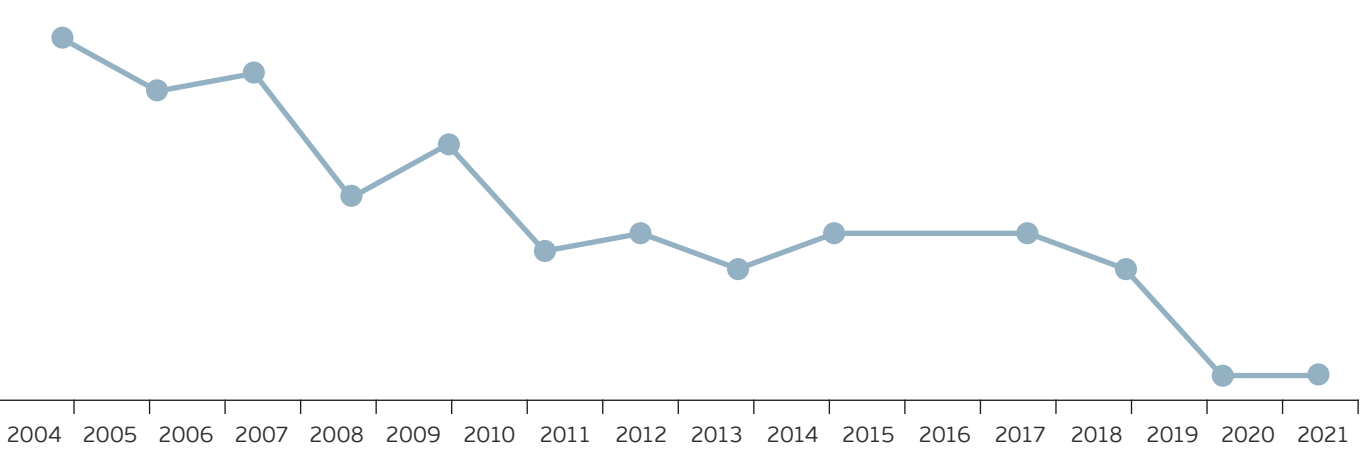


FIGURE 10.2: Consumption of A4 paper per office/year (kg) and supply of A4



ABOUT THE SUSTAINABILITY REPORT

ABOUT THE SUSTAINABILITY REPORT

The Sustainability Report 2021 includes information about the Corporate Responsibility policies and programs of Wind Hellas, as well as our performance in actions we develop aiming at sustainable development and entrepreneurship, prioritizing four pillars: the Market, our People, the Environment and Society. It covers the period starting on January 1, 2021 and ending in December 31, 2021. It is the thirteenth consecutive Sustainability Report we issue. Our previous report was issued in July 2021 and pertained to the years 2019-2020.

This report was drafted and the data was collected by the interdepartmental Sustainability Working Group. In some cases, data of previous years were restated due to the different method of data calculation. This report is based on the international standards of GRI (Global Reporting Initiative) and SASB (Sustainability Standards Accounting) and covers all essential issues as identified by Wind Hellas and its Stakeholders. The accuracy of the data was reviewed by the Company's Internal Audit Department. For determining the content, we took into account results of the Analysis of Materiality, the Principles and the Objectives of Sustainable Development as defined by the United Nations Global Compact and Agenda 2030 respectively. It must also be noted that in 2021 Wind Hellas was included in the group of "The most sustainable companies in Greece" for 2022.



WE PROMOTE THE SUSTAINABLE DEVELOPMENT GOALS (SDGS)





We have adopted the United Nations agenda with the 17 Sustainable Development Goals (SDGs) and are determined to contribute actively and effectively to promote the well-being of society, fight poverty and protect the environment.

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

The table below shows the correlation and practical adoption of the UN Sustainable Development Goals with our program and actions for 2025.

Correlation Table of the UN Sustainable Development Goals

Sustainable Development Goals	Material Issues	Objectives 2025	GRI STANDARDS Index
<div>1</div> <div>NO POVERTY</div> 	<ul style="list-style-type: none"> Product quality. Support of local communities. 	<ul style="list-style-type: none"> Provision of digital access to residents of remote areas aiming at equal participation in the digital future. Provision of ≥ 90% of annual supply to Greek companies. 	GRI 202 GRI 413
<div>2</div> <div>ZERO HUNGER</div> 	<ul style="list-style-type: none"> Presence in local market. Product quality. 		GRI 203 GRI 204
<div>3</div> <div>GOOD HEALTH AND WELL-BEING</div> 	<ul style="list-style-type: none"> Employee health & safety. Electromagnetic radiation. 	<ul style="list-style-type: none"> Employee satisfaction at 75% (based on surveys). Flexible forms of work for 85% of employees. Sustainable operation. 	GRI 403
<div>4</div> <div>QUALITY EDUCATION</div> 	<ul style="list-style-type: none"> Social benefits of employees. 	<ul style="list-style-type: none"> Continuous information of employees about the 25 Goals. Provision of digital access to residents of remote areas aiming at equal participation in the digital future. Participation of 100% of employees in awareness sessions regarding the Code of Conduct of Wind Hellas. 	GRI 401
<div>5</div> <div>GENDER EQUALITY</div> 		<ul style="list-style-type: none"> Empowerment of women to enhance skills through partnerships and initiatives to achieve their goals. 35% of women in roles of responsibility. 	
<div>6</div> <div>CLEAN WATER AND SANITATION</div> 	<ul style="list-style-type: none"> Employee health & safety. Environmental legislation. 	<ul style="list-style-type: none"> Use of technological solutions for the protection of the environment and biodiversity of Greece. 	GRI 403 GRI 307
<div>7</div> <div>AFFORDABLE AND CLEAN ENERGY</div> 	<ul style="list-style-type: none"> Energy consumption. Environmental legislation. 	<ul style="list-style-type: none"> Reduction of energy consumption in central base stations and data centers by more than 10%. Use of technological solutions for the protection of the environment and biodiversity of Greece. 100% use of green electrical energy through Guarantees of Origin and reduction of emissions from energy production by 10%. Climatic Neutral Certification for 10% of Wind's stores. 	GRI 302 GRI 307

<div>8</div> <div>DECENT WORK AND ECONOMIC GROWTH</div> 	<ul style="list-style-type: none"> Profitability. Social benefits to employees. 	<ul style="list-style-type: none"> Employee satisfaction at 75% (based on surveys). Enhancement of existing well-being programs and introduction of new ones. Flexible forms of work for 85% of employees. 	GRI 102-8 GRI 102-41 GRI 201 GRI 401
<div>9</div> <div>INDUSTRY, INNOVATION AND INFRASTRUCTURE</div> 	<ul style="list-style-type: none"> Product quality. Support of local communities. 	<ul style="list-style-type: none"> Digital connectivity for all through manufacturing optical fibers and 5G mobile telephony network amounting to 500 million euros with the aim to cover the 90% of population until 2025. Digital network that promotes sustainability and adoption of sustainable practices. Improved digital customer experience with integrated and secure communications services. Provision of digital access to residents of remote areas aiming at equal participation in the digital future. Use of technological solutions for the protection of the environment and biodiversity of Greece. 	GRI 413
<div>10</div> <div>REDUCED INEQUALITIES</div> 	<ul style="list-style-type: none"> Support of local communities. 	<ul style="list-style-type: none"> Empowerment of women to enhance skills through partnerships and initiatives to achieve their goals. 35% of women in roles of responsibility. 	GRI 413
<div>11</div> <div>SUSTAINABLE CITIES AND COMMUNITIES</div> 	<ul style="list-style-type: none"> Support of local communities. Presence in local market. 	<ul style="list-style-type: none"> Digital connectivity for all through manufacturing optical fibers and 5G mobile telephony network amounting to 500 million euros with the aim to cover the 90% of population until 2025. Continuous information of employees about the 25 Goals. Digital network that promotes sustainability and adoption of sustainable practices. Provision of digital access to residents of remote areas aiming at equal participation in the digital future. 400 hours of volunteering in social and environmental initiatives per year. Reduction of the company's fleet vehicle emissions by using hybrid cars by at least 10%. Use of technological solutions for the protection of the environment and biodiversity of Greece. Sustainable operation. 	GRI 202 GRI 413

<div>12</div> <div>RESPONSIBLE CONSUMPTION AND PRODUCTION</div> <div> </div>	<div> <div>▶ Sustainability Report.</div> </div>	<div> <div>▶ Continuous information of employees about the 25 Goals.</div> <div>▶ Digital network that promotes sustainability and adoption of sustainable practices.</div> <div>▶ 100% separation and treatment of waste in offices: we introduce the concept of circular economy through a leasing program for telephone devices and other electrical equipment.</div> <div>▶ Reduction of the company's fleet vehicle emissions by using hybrid cars by at least 10%.</div> <div>▶ Reduction of energy consumption in central base stations and data centers by more than 10%.</div> <div>▶ Use of technological solutions for the protection of the environment and biodiversity of Greece.</div> <div>▶ Sustainable operation.</div> <div>▶ 100% use of green electrical energy through Guarantees of Origin and reduction of emissions from energy production by 10%.</div> <div>▶ Climatic Neutral Certification for 10% of Wind's stores.</div> </div>	<div>GRI 102-55</div>
<div>13</div> <div>CLIMATE ACTION</div> <div> </div>	<div> <div>▶ Energy consumption.</div> <div>▶ Greenhouse gas emissions.</div> <div>▶ Environmental compliance.</div> </div>	<div> <div>▶ Digital network that promotes sustainability and adoption of sustainable practices.</div> <div>▶ Reduction of the company's fleet vehicle emissions by using hybrid cars by at least 10%.</div> <div>▶ Reduction of energy consumption in central base stations and data centers by more than 10%.</div> <div>▶ Use of technological solutions for the protection of the environment and biodiversity of Greece.</div> <div>▶ Sustainable operation.</div> <div>▶ 100% use of green electrical energy through Guarantees of Origin and reduction of emissions from energy production by 10%.</div> <div>▶ Climatic Neutral Certification for 10% of Wind's stores.</div> </div>	<div> <div>GRI 302</div> <div>GRI 305</div> <div>GRI 307</div> </div>
<div>14</div> <div>LIFE BELOW WATER</div> <div> </div>	<div> <div>▶ Environmental legislation.</div> </div>	<div> <div>▶ Use of technological solutions for the protection of the environment and biodiversity of Greece.</div> <div>▶ Sustainable operation.</div> </div>	<div>GRI 307</div>
<div>15</div> <div>LIFE ON LAND</div> <div> </div>	<div> <div>▶ Electromagnetic radiation.</div> </div>	<div> <div>▶ 100% separation and treatment of waste in offices. We introduce the concept of circular economy through a leasing program for telephone devices and other electrical equipment.</div> <div>▶ Sustainable operation.</div> </div>	
<div>16</div> <div>PEACE, JUSTICE AND STRONG INSTITUTIONS</div> <div> </div>	<div> <div>▶ UN Global Compact.</div> </div>	<div> <div>▶ Sustainable Development Strategy "25 Goals for 2025".</div> </div>	<div> <div>GRI 102-12</div> <div>GRI 102-16</div> </div>
<div>17</div> <div>PARTNERSHIPS FOR THE GOALS</div> <div> </div>	<div> <div>▶ Participation in unions/ organizations.</div> <div>▶ Sustainability Report.</div> </div>	<div> <div>▶ Continuous information of employees about the 25 Goals</div> <div>▶ 100% participation and awareness of employees on sustainable development on an annual basis.</div> </div>	<div>GRI 102-13</div>

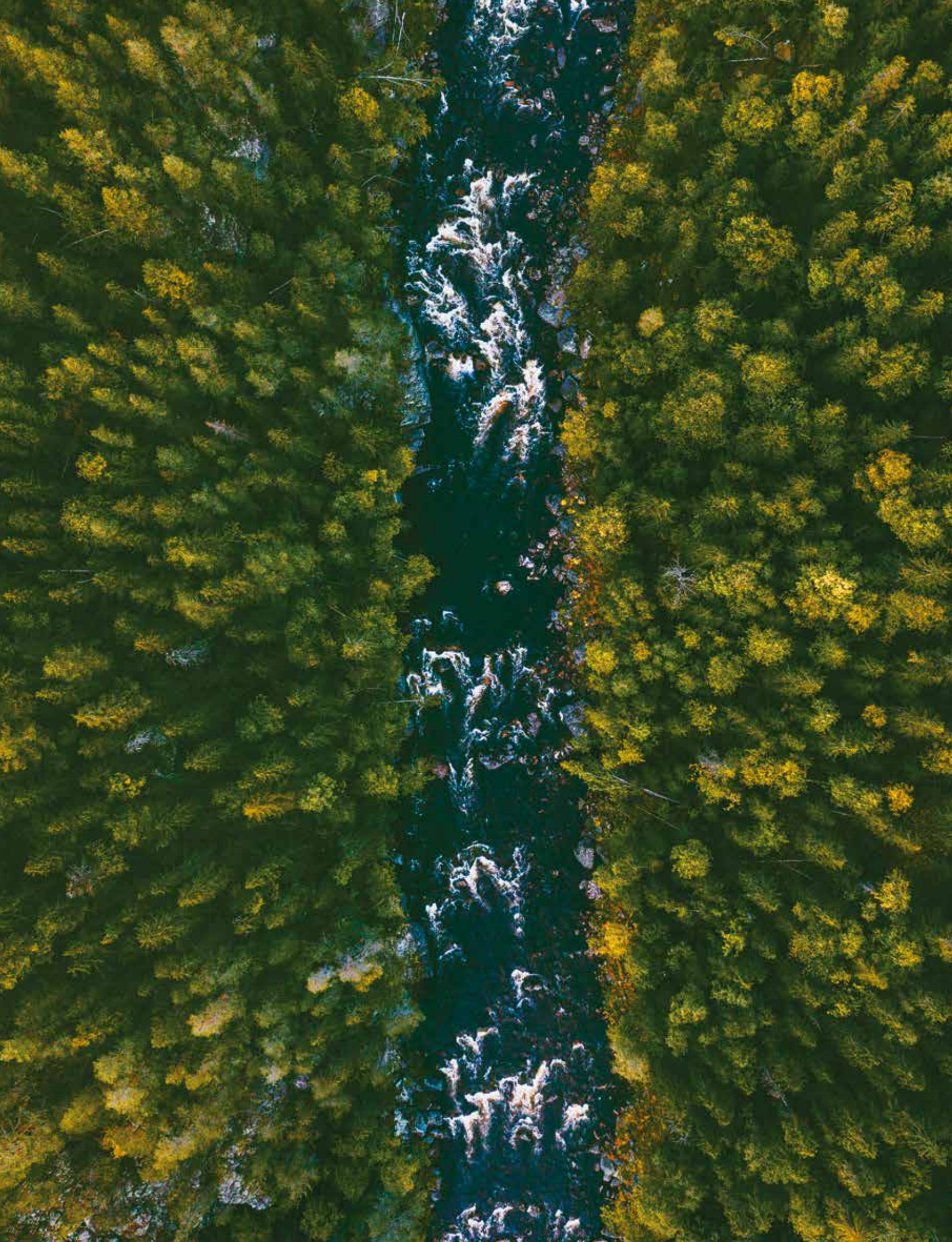


Table of Sustainability Accounting Standards Board (SASB)

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

SASB Code	Activity Metric	
Carbon Footprint and Function		
TC-TL-130a.1.	(1) Total energy consumption, (2) percentage of electricity from the grid, (3) percentage of energy from renewable sources	2020: (1) 440,184 GJ (2) ~90% (3) 0% 2021: (1) 305,032GJ 2) 63.5% (3) 36.5%
Data Privacy		
TC-TL-220a.1.	Description of policies and practices related to advertising and protection of customer privacy	The company strictly applies a broad framework of technical measures and Security Policies, approved by the Data Protection Authority (DPA) and the Hellenic Authority for Communication Security and Privacy (ADAE).
TC-TL-220a.2.	Number of customers whose information is used for secondary purposes:	The company processes the data of its customers exclusively for purposes related to its business. The number is confidential and cannot be made public.
TC-TL-220a.3.	Total amount of monetary losses as a result of legal proceedings related to customer privacy issues:	No decision has been issued and no fine was imposed by the Hellenic Data Protection Authority for 2021.
TC-TL-220a.4.	(1) Number of law enforcement requests for customers' information, (2) number of customers whose information was requested, (3) rate of information disclosed:	The number is confidential and cannot be made public.
Data Security		
TC-TL-230a.1.	(1) Number of data breaches, (2) percentage of those involving personally identifiable information (PII), (3) number of customers affected	The company maintains the strictest policies to ensure the security and integrity of the personal data of its customers and takes all necessary measures to ensure the protection of their personal data and transparent processing always in accordance with the requirements of the legislative framework. If we find that there is a data breach, we will notify affected consumers and the relevant authorities as required by applicable law.
TC-TL-230a.2.	Description of the approach to identify and address data security risks, including the use of international cybersecurity standards:	The company strictly applies a broad framework of technical measures and Security Policies, approved by the Data Protection Authority (DPA) the Hellenic Authority for Communication Security and Privacy (ADAE), and the Hellenic Cybersecurity Authority.

End-of-life management		
TC-TL-440a.1.	(1) Materials recovered through return programs, percentage of recovered materials that were (2) reused, (3) recycled and (4) landfilled:	As a Producer (pursuant to Law 2939/2001), WIND participates in the competent Collective Management System (Appliances Recycling S.A.). Sales-based contributions are paid to the system for all items placed on the market for the purpose of collecting them after use and reusing or recycling them. Out of the waste generated, 100% of the hazardous and 100% of the special streams (WEEE, Waste Oils and CD&E Waste) are sent for recycling as set out by law. As regards other waste, landfill disposal was 20% in 2020 (due to non-recyclable items such as furniture) and 1% in 2021 (27.2 tonnes). The remaining percentage is sent to recycling. Items in good condition (equipment, furniture, spare promotional materials, t-shirts, etc.) are donated.
Competitive Behaviour and the Open Internet		
TC-TL-520a.1.	Total amount of monetary losses as a result of legal proceedings related to anticompetitive conduct regulations:	During the period 2019-2020 there were no incidents of anti-competitive behaviour, and therefore there were no related losses.
TC-TL-520a.2.	Average actual constant download speed of (1) company-owned and related content and (2) other non-related content:	The company treats all traffic equally, without exclusions, restrictions or interference and regardless of the sender and the recipient, the content accessed or distributed, the applications or services used or provided or the terminal equipment used. The company does not apply traffic management measures, beyond those reasonable, unless this is necessary and only for as long as necessary in order to: a) comply with the legal and regulatory framework, b) ensure the integrity and security of the network, c) prevent disruptions due to network congestion.
TC-TL-520a.3.	Description of the risks and opportunities associated with network neutrality, zero billing, paid peering and other related practices:	Information regarding the open internet, as well as technical details regarding the quality of services, quality parameters, traffic management measures, can be found on the company's website: https:// www.wind.gr/gr/netneutraity/
Managing systemic risks from technological disruptions		
TC-TL-550a.1.	(1) Average frequency of system outages and (2) average duration of outage per customer:	2020: (1) 0.041, (2) 0.012 2021: (1) 0.050, (2) 0.0004 The data provided is for the fixed network. As regards the mobile network, Wind Hellas does not calculate or report metrics relating to the frequency and duration of system interruption in the manner specified by the standard. However, the metrics we use to monitor our network performance are available and can be provided upon request.
TC-TL-550a.2.	Description of systems to ensure uninterrupted service during service disruptions	At Wind Hellas we acknowledge and accept the necessity and responsibility for the creation and adoption of a Business Continuity Management framework, which we have developed in accordance with the international standard ISO 22301:2019 - Societal, security - Business Continuity Management System - Requirements and the regulatory obligations governing the Greek market, at the same time honoring our commitment to our customers, employees, shareholders and suppliers. In this context, WIND has been certified with the aforementioned international standard ISO 22301:2019 since April 2017 in order to continue all our critical operations and to provide continuously the critical services to our customers in case of an event which could negatively impact important business units, systems, and services. For this reason, we have developed a Business Continuity Management system, in the framework of which we have set and prioritized our company's critical functions, activities, infrastructures, services, as well as the resources that can be activated at any time. In addition, we have identified and assessed any operational risks and taken all necessary measures to mitigate their impact on WIND's daily operations, implementing strategies and solutions that enhance the resilience of the organization. At the same time, we continuously develop, implement, test, maintain and review these Business Continuity, Crisis Management and Communication Plans.

Table of Materiality Key Issues and Limits

The handling of Materiality Key Issues of Wind Hellas is influenced both by the company and by its other stakeholders, within and outside the company. This report and the data describing our performance on the materiality key issues cover all activities of Wind Hellas.

Material Issues	Limits within Operation	Limits Outside the Company
Protection of Personal Data	Wind Hellas Shareholders Commercial Network	Regulatory Authorities NGOs / Citizen Organizations Central Government / Local Government Customers (Individuals - Businesses) Academic Community Media
Employee health & safety	Wind Hellas Employees Shareholders Commercial Network	NGOs / Citizen Organizations Media
Environmental legislation	Wind Hellas	NGOs / Citizen Organizations Central Government / Local Government Academic Community Media
Social Benefits of Employees	Wind Hellas Employees Commercial Network	Media
Competition Legislation	Wind Hellas Shareholders Commercial Network	Regulatory Authorities NGOs / Citizen Organizations Central Government / Local Government Media Suppliers
Waste management	Wind Hellas Commercial Network	NGOs / Citizen Organizations Central Government / Local Government Media
Network investments	Wind Hellas Shareholders Commercial Network	Regulatory Authorities Central Government / Local Government Customers (Individuals / Businesses) Media Suppliers

Electromagnetic radiation	Wind Hellas	Regulatory Authorities NGOs / Citizen Organizations Central Government / Local Government Academic Community Media
Safe Use of New Technologies	Wind Hellas Employees Commercial Network	Regulatory Authorities NGOs / Citizen Organizations Central Government / Local Government Customers (Individuals / Businesses) Academic Community Media
Ensuring Privacy of Communication	Wind Hellas Employees Commercial Network	Regulatory Authorities NGOs / Citizen Organizations Central Government / Local Government Customers (Individuals / Businesses) Academic Community Media
Anti-corruption	Wind Hellas Shareholders Commercial Network	Regulatory Authorities NGOs / Citizen Organizations Central Government / Local Government Customers (Individuals / Businesses) Academic Community Media
Non-Discrimination	Wind Hellas Employees Commercial Network	NGOs / Citizen Organizations Media
Diversity and Equal Opportunities	Wind Hellas Employees Commercial Network	NGOs / Citizen Organizations Media
Quality of Services	Wind Hellas Employees Commercial Network	Customers (Individuals / Businesses) Media
Indirect Social Impact	Wind Hellas	NGOs / Citizen Organizations Central Government / Local Government Media
Profitability	Wind Hellas Shareholders	Media
Procurement Practices	Wind Hellas Commercial Network	Customers (Individuals / Businesses) Suppliers

GRI TABLE “in accordance – Core”.

This Sustainability Report is the fourteenth edition of Wind Hellas and covers the actions and activities implemented by the company in 2021 (1/1/2021-31/12/2021).

The Center for Sustainability and Excellence, following evaluation according to the most valid and strict international GRI STANDARDS guidelines, confirms that it is at the level of “In accordance- Core”.

GRI Standards Index	Description	Coverage
General Information		
Company Profile		
GRI 102-1	Name of the organization	WIND HELLAS TELECOMMUNICATIONS SINGLE-MEMBER COMMERCIAL & INDUSTRIAL SA
GRI 102-2	Activities, brands, products, and services	p. 9
GRI 102-3	Location of headquarters	106 Athinon Ave., Athens, PC 104 42
GRI 102-4	Location of Operations	p. 8
GRI 102-5	Ownership and legal form	SINGLE-MEMBER COMMERCIAL & INDUSTRIAL SA
GRI 102-6	Markets served	p. 8-9
GRI 102-7	Scale of the organization	p. 10, 47, 66-67
GRI 102-8	Information on employees and other workers	p. 47 -48
GRI 102-9	Supply chain	p. 70- 71.74
GRI 102-10	Significant changes to the organization and its supply chain	p. 5, 9, 11
GRI 102-11	Precautionary Principle or approach	p. 16-19, 27-34, 72-74
GRI 102-12	External initiatives	p. 19, 38-43, 50-51, 55
GRI 102-13	Membership of associations	p. 12-13
Strategy		
GRI 102-14	Statement from senior decision-maker	p. 5
Ethics and Integrity		
GRI 102-16	Values, principles, standards, and norms of behavior	p. 16-19, 27-34
Governance		
GRI 102-18	Governance structure	p. 29
Stakeholder Engagement		
GRI 102-40	List of stakeholder groups	p. 21
GRI 102-41	Collective bargaining agreements	p. 48
GRI 102-42	Identifying and selecting stakeholders	p. 20-21
GRI 102-43	Approach to stakeholder engagement	p. 21
GRI 102-44	Key topics and concerns raised	p. 21

Reporting Practices		
GRI 102-45	Entities included in the consolidated financial statements	p. 10-11
GRI 102-46	Defining report content and topic Boundaries	p. 22-23
GRI 102-47	List of material topics	p. 22
GRI 102-48	Restatements of information	There are no restatements of information
GRI 102-49	Changes in reporting	p. 5, 11
GRI 102-50	Reporting period	01/01/2021 – 31/12/2021
GRI 102-51	Date of most recent report	Sustainability Report
GRI 102-52	Reporting cycle	Annual
GRI 102-53	Contact point for questions regarding the report	Back Cover
GRI 102-54	Claims of reporting in accordance with the GRI Standards	p. 102
GRI 102-55	GRI content index	p. 102-104
GRI 102-56	External assurance	p. 106-109
Specific Disclosures		
Economy		
GRI 201	Economic Performance	
GRI 103	Management Approach	p. 10
GRI 201-1	Direct economic value generated and distributed	p. 10
GRI 203	Indirect Economic Impacts	
GRI 103	Management Approach	p. 37, 60
GRI 203-1	Significant indirect economic impacts	p. 38-42, 62-65, 68-71
GRI 204	Procurement Practices	
GRI 103	Management Approach	p. 76
GRI 204-1	Proportion of spending on local suppliers	p. 76
GRI 205	Anti-corruption	
GRI 103	Management Approach	p. 32
GRI 205-3	Confirmed incidents of corruption and actions taken	p. 32
GRI 206	Anti-competitive behavior	
GRI 103	Management Approach	p. 70-71
GRI 206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p. 70
Environment		
GRI 306	Effluent and Waste	
GRI 103	Management Approach	p. 79, 87
GRI 306-2	Waste by type and disposal method	p. 87-89
GRI 307	Environmental Compliance	
GRI 103	Management Approach	p. 78
GRI 307-1	Non-compliance with environmental laws and regulations	p. 79

Employees - Society		
GRI 401	Employment	
GRI 103	Management Approach	p. 49-52
GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	p. 52
GRI 403	Occupational Health and Safety	
GRI 103	Management Approach	p. 53
GRI 403-1	Occupational health and safety management system	p. 53
GRI 403-2	Hazard identification, risk assessment, and incident investigation	p. 53
GRI 403-3	Occupational health services	p. 53
GRI 403-4	Worker participation, consultation, and communication on occupational health and safety	p. 53
GRI 403-5	Worker training on occupational health and safety	p. 53
GRI 403-6	Promotion of worker health	p. 53
GRI 403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	p. 53
GRI 403-9	Work-related injuries	p. 53
GRI 405	Diversity and Equal Opportunities	
GRI 103	Management Approach	p. 48-52
GRI 405-1	Diversity of governance bodies and employees	p. 47
GRI 406	Non-discrimination	
GRI 103	Management Approach	p. 48-52
GRI 406-1	Incidents of discrimination and corrective actions taken	During the reporting period there were no incidents of discrimination
GRI 418	Customer Privacy	
GRI 103	Management Approach	p. 72
GRI 418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	p. 72
Non-GRI	Electromagnetic radiation	
GRI 103	Management Approach	p. 86
Non-GRI	Ensuring privacy of communication	
GRI 103	Management Approach	p. 72, 98
Non-GRI	Safe use of new technologies	
GRI 103	Management Approach	p. 38, 55, 69
Non-GRI	Quality of services	
GRI 103	Management Approach	p. 60, 70-74
Non-GRI	Network investments	
GRI 103	Management Approach	p. 66-67

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



EXTERNAL ASSURANCE REPORT



This External Assurance report was conducted by CSE North America on behalf of WIND Hellas and its Sustainability Report 2021 for the period 1/1/2021 to 31/12/2021. The goal of the process is to provide assurance towards the stakeholders of WIND Hellas for the accuracy, reliability and objectivity of the information in the Sustainability Report, as well as that the report covers all the material issues, as identified by WIND Hellas and its stakeholders. The Sustainability Report has been conducted according to the GRI Standards (in accordance core), and the SASB Standards for the Telecommunications industry.

Scope & Methodology

Sustainability Report has been conducted according to GRI Standards (in-accordance core), as well as the SASB Standards for the Telecommunication industry.

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

General Conclusions

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

- The description of WIND Hellas activities and performance during 2021, as well as the way they have been presented in the Sustainability Report, is accurate.
- WIND Hellas complies with the principles of inclusivity, materiality, responsiveness and impact, as defined in the AA1000AS v3.

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

Key Observations and Recommendations

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

- The establishment of the new Sustainable Development Strategy, called “25 goals for 2025”, as well as the progress made on those goals during 2021.

- The company’s efforts and initiatives with relation to the ongoing COVID-19 pandemic.
- The inclusion in “The Most Sustainable Company in Greece”, which confirms the company’s commitment towards sustainable development.
- The participation for the first time in S&P’s international sustainable development index, namely the Corporate Sustainability Assessment (CSA).

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

With respect to the principle of inclusivity, WIND Hellas must maintain and aim at further developing the existing model of engaging and communicating with its stakeholders.

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

Findings and Conclusions Regarding the Principles

- Inclusivity – how the stakeholder groups have been identified, and how WIND Hellas communicated with them regarding sustainability. The communication activities with the stakeholder groups include all key stakeholder groups of WIND Hellas. Also, WIND Hellas has implemented the appropriate principles in the development of its approach towards sustainable development.
- Materiality – how WIND Hellas determines the importance for the selection of the material sustainability issues. The process of determining the material issues by WIND Hellas provides a balanced representation of the material issues based on its sustainability performance.
- Responsiveness – how WIND Hellas responded to the issues set by the stakeholders and how this process is described within the Sustainability Report. WIND Hellas has

implemented the principle of responsiveness during the selection of the issues included in the report. At the same time, its sustainability strategy responds to the concerns of the stakeholders, and to the long-term commitment towards corporate responsibility.

- Impact – how WIND Hellas monitors, measures, and is accountable for its impacts on the broader ecosystem. WIND Hellas has identified all key sustainability issues and has reported on them using the GRI Standards and SASB Standards. At the same time, WIND Hellas’s long-term strategy and goals respond to both the short-term impacts and long-term impacts, and aim to adoption and mitigation. As stated in the Sustainability Report there is major potential for improvement through WIND Hellas’s communication technology for daily operations of businesses and positive impacts on society.

For Example: The WIND Fleet Management service offers the ability to companies, professionals, public organizations, private organizations, and institutions that manage vehicle fleets and means of transportation to reduce their operating costs, better allocate their resources, and increase their safety and productivity by improving their operations and processes. **In this context, they achieve significant reduction in the carbon footprint of their business.** Future Sustainability Reports could assess and quantify that impact in terms of GHG emission reduction potential (e.g., Telemedicine, Retail Trade, Agriculture, Smart Cities).

- Specific Performance Information. The Specific Performance Information (quantitative data related to GRI and SASB metrics and indicators) has been collected and presented in a commonly accepted manner in the Sustainability Report and all disclosures have been reviewed during the assurance process. During the assurance process the following metrics and information were reviewed:
 - General disclosures about WIND Hellas profile, its strategy, its ethics and integrity, its corporate governance, its engagement with stakeholders, and its reporting practices.
 - Specific Disclosures about:
 - Greenhouse gas emissions and their reduction.
 - Energy consumption, intensity and reduction.
 - Electromagnetic radiation and the recognition and mitigation of impacts to the local communities.
 - Production and management of waste.
 - Other emissions for WIND Hellas operations.
 - Statements regarding compliance to environmental laws and regulations.
 - Benefits provided to full-time employees.
 - Occupational health and safety
 - Employment records.
 - Policies and incidents regarding corruption.

- Statements regarding compliance to anti-competitive behavior laws and regulations.
- Practices regarding customer data and privacy.
- Employee training.
- Supply chain characteristics.
- Selection and evaluation of suppliers.
- Records about diversity, non-discrimination and equal opportunities.
- The incorporation of the UN Sustainable Development Goals in the Sustainability Report.

Exceptions and Limitations

The assurance process did not include information related to:

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

Responsibilities of WIND Hellas and the Assurance Provider

The preparation, presentation, and the content of the online versions of the Sustainability Report is the responsibility of WIND Hellas. The responsibility of CSE North America lies in providing an independent assurance to the stakeholders for the accuracy, reliability and objectivity of the information included in the report, as well as to express its overall opinion based on the type of engagement, as defined by the present report.

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

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

On behalf of CSE North America
Thomas Weber





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

Wind Hellas

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You can send your comments to csr@wind.gr

