

# Sustainability Report

**2016**



**WIND**

# OUR CONTRIBUTION

TO SOCIETY, THE ECONOMY, TO THE SUSTAINABLE DEVELOPMENT GOALS



**4 billion €**

**TO THE NATIONAL ECONOMY**  
DIRECT AND INDIRECT CONTRIBUTION

**1.1 billion €**

**PUBLIC REVENUE**  
IN TAXES - FEES - INS. CONTRIBUTIONS

2016



**214**

**WIND STORES  
ACROSS GREECE**

Digital stores with strong  
environmental imprint



**600 million €**  
**INVESTMENTS**

**2.962 billion €**  
from our start until today



**> 30,000**  
**JOBS**  
DIRECT & INDIRECT

with respect to the human



**SUSTAINABLE DEVELOPMENT GOALS**  
17 GOALS TO TRANSFORM OUR WORLD

SOCIETY



**543,000 €**

**TO PUBLIC UTILITY ORGANIZATIONS THAT SUPPORT CHILDREN RUNNING MOVEMENT**

MARKET

2016



**> 3.9 million SUBSCRIBERS**

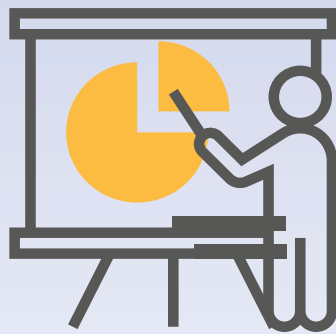
MOBILE | FIXED TELEPHONY | INTERNET

**5.1 billion CALLS** WERE DELIVERED THROUGH OUR NETWORK

**15.4 billion CONNECTIONS** TO THE INTERNET BY OUR MOBILE TELEPHONY SUBSCRIBERS

EMPLOYEES

2016



**23,378 hours** EMPLOYEE TRAINING

ENVIRONMENT

2016



**780,000 kwh** ENERGY SAVINGS

FROM PROJECTS IN BUILDINGS & EQUIPMENT

energy required to supply electricity to **1** island of **600** residents for **1** year

**36 tons** SAVINGS IN PAPER USE OF E-BILL



\* Data concern the period 2010-2016 unless stated otherwise

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# MESSAGE FROM THE CHAIRMAN OF THE BOARD & CEO

**Dear Friends,**



Every year I seize the opportunity from this medium to express my personal thoughts and observations not only for WIND, but also concerning the reality around us. For me this is what is important to understand; namely as an organization and as individuals, what is happening around us and in our time, how we interact, how we perceive change and what we are doing to prepare for the future.

I consider myself to be very lucky to head an organization that is at the center of these changes. You will agree with me that digital technologies and the infinite abilities they open are the most exciting evolution of the last decades. Physical reality coexists with digital reality. Each one of us already experiences and shares experiences in these two worlds; the physical and the digital world. What is expected to rapidly change in the years to come is the number and wealth of digital experiences we chose to experience.

What will we experience digitally? The map of options unfolds perpetually. Entertainment, education, sports, personal development, interpersonal relations, artistic creation; are continually passing to the digital sphere, together with the most mundane and practical activities: digital economy and work, digital state and transactions with the state, digitization of transportation, transit, health etc. No sector of the physical world will remain untouched by the digital revolution, for which we are talking about more and more.

Describing the future that is already here to a large degree, I think of the opportunities for a provider of new generation technology and infrastructure like WIND Hellas and at the same time I also realize the responsibility we have right now and which is increasing. There has never been a time in history where prosperity and our happiness depended so much on technology. This is the essence of the Digital Revolution. And communication together with internet connectivity are the foundations of the new digital reality.

Undertaking this responsibility, we must make our customers' lives better each and every day. I am especially pleased to see our strategy and investments translate to broadband coverage everywhere, to new and better services and products, and to even better service for our customers. I am also particularly pleased and proud that every year we continue giving back to society the value created by our customers, through a multifaceted Corporate Social Responsibility strategy; on which you will be able to read more in this report. In closing, I want to renew the commitment of WIND toward the Greek economy and society and to all stakeholders. We will continue with the same and even greater spirit to work, so that communication is the vehicle that will allow our subscribers to fulfill their capabilities to the maximum degree possible and to experience their everyday lives in a better way.

**Nassos Zarkalis**

Chairman of the BoD & CEO, WIND Hellas





# WIND HELLAS

## Investing in development

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

We believe in the power of a modern world where everything is interconnected and when you have connection you can do everything. Since our establishment, we have invested 2.962 billion euros to develop infrastructure, thus implementing one of the largest private investment projects in Greece.

## The Company & Landmarks

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

Throughout all these years, we were established as a pioneer in mobile telephony technology and introduced innovative products that changed the status quo in the field of communications. Today WIND has more than 3.9 million mobile and fixed telephony subscribers, and is the first telecommunications company in Greece to offer integrated Mobile, Fixed Telephony & Internet services to its customers. Flexibility, reliability and simplicity characterize the architecture of its integrated network, offering coverage approaching 100% in mobile telephony and 75% of installed telephone lines across the country, for fixed telephony and broadband Internet.

In its many years of operation, WIND Hellas has evolved from a mobile telephony company to an integrated telecommunications provider creating an equally strong Fixed Telephony & Internet business unit with extended privately-owned facilities across Greece.

### 2016...

- Was a landmark year in the recent history of WIND Hellas, as this was the first year from the start of the economic recession in our country, where a company marked an increase in revenue and returned to a profitable state; harvesting the fruit of the strategy it applied consistently for seven years and which involved maximizing its cost structure, developing its infrastructure and providing high value services to its customers.
- In mobile telephony the share of active customers remained at 20%. Respectively, the W contract, which is the greatest value product of WIND Hellas, marked an increase of 55% in customers.

- The rapid development of the 4G network continued and the coverage of population increased from 60% to 66.4% at the end of the year, maintaining the European record for the fastest growing 4G network.
- The explosive development continued, since within one year smartphone users using WIND Hellas data services increased by 30%, while data use by smartphone users doubled.
- In fixed telephony LLU customers exceeded 550,000 and the market share of the company rose to 26.8%. 47% of mobile telephony subscribers of WIND Hellas now have a fixed telephony contract with the company, while more than 200,000 households cover all their telecommunications needs with WIND.
- In 2016, mobile telephony customer satisfaction reached an impressive 85% (up from 64% in 2013), while disconnections fell even more, both in mobile as well as fixed telephony.
- 175 new digital stores operated in 2016 throughout Greece, completely changing WIND's presence in the retail market. This is a huge investment to be completed in 2017 reaching 20 million EUR in total. During 2016, the new WIND stores successfully completed 7.5 million transactions.

# Products & Services

At WIND Hellas, we offer mobile and fixed telephony and broadband Internet services. Our basic products in 2016 were.

## INDIVIDUALS

### Mobile & Fixed Telephony bundles

- WIND triple play

### Mobile plans - Contract

- W
- W PLUS
- W WEB
- Prepaid telephony

### Prepaid plans

- F2G
- Q

### Fixed Telephony & Internet plans

- WIND Double Play
- WIND Broadband
- WIND Telephony
- SIMPLExi

### WIND VDSL Technology

### WIND Mobile Broadband

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

## BUSINESS

### Mobile plans - Contract

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

### Mobile Fleet Management Plans

- Mobile Fleet Management

### Freeze Alert Plans

- Wind Freeze Alert

### Management and promotional activities plans

- Wind Marketapp

# Creating Value

## Financial Growth & Feature Figures

During its course, WIND Hellas was one of the largest private investors in Greece, as it realized investments amounting to 2.962 billion € in technological infrastructure, thus creating tangible and intangible value for the economy and the country. WIND Hellas is totally owned by Crystal Almond Limited holding company, which is its parent company. Shareholders of Crystal Almond Limited are investment capital companies, of the largest investment funds worldwide.

By investing in WIND Hellas they demonstrated their faith in the Company's development prospects, as well as in the ability of the Greek economy to recover.

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

	2015 (million €)	2016 (million €)
Turnover	472.7	483.8
Investments*	89.4	99.8
Insurance contributions	6.9	7.1
Total financial liabilities	263.0	294.8
Total equity	260.8	161.0
Total assets	881.0	773.3
Mobile and Fixed Telephony customers	3.9	3.9
Number of stores at the end of the period	220	214
Employees (FTEs)	970.6	981.6
Employees (Heads)	977.0	987.0

\*December 2016 of which €6.8 million concern 1,800 MHz and 26 GHz licenses

## Participation in third companies

### Victus Networks SA

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

### Forthnet SA

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

# Participation

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

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

**BODIES FOR SUSTAINABLE DEVELOPMENT**

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

**PROFESSIONAL BODIES**

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



## Distinctions

2016 was yet another year for exceptional distinctions for our Company and its people. We were distinguished in many sectors, such as customer service, maximum utilization of the digital environment and social network media, expanding the communication channels of the campaign Kids@Safety for the safe use of new technologies by children, as well as for our integrated strategic approach in Responsible Entrepreneurship.

### • CR Index National Corporate Responsibility Index

In particular, we won a **Gold** award for our performance in the implementation of responsible corporate practices, based on the National Corporate Responsibility Index (CR Index) and a **Best Progress Gold** award from the **Institute for Corporate Responsibility**. The CR Index (Corporate Responsibility Index) consists of 100 especially strict international criteria developed by the British non-profit organization Business in the Community (BITC) and in which the largest companies globally participate. In this context the company is assessed annually by special evaluation experts of the CRI.

### • National Champion in Customer Service

WIND was awarded the first prize for our team's training program on optimizing Customer Service at the **National Customer Service Awards** by the Greek Institute of Customer Service. Our award-winning training program applies to all reporting lines and all roles of responsibility, in order to establish a Single Customer-Focused Culture to better serve all WIND customers in mobile and fixed telephony. This resulted in the Customer Satisfaction Index to increase to **85%** and subscribers' satisfaction for speed of service to approach **90%**. Additionally, **93%** of WIND customers say they are satisfied with the training of the salespeople, and **95%** say that our team's friendliness and courtesy is excellent.

### • Event Awards 2016

WIND Hellas came away with **3 awards; 1 gold and 2 silver**, at the **Event Awards** held for the first time in Greece by Boussias Communications and the magazine Marketing Week. Specifically, in collaboration with the companies BLT Communications, WEST, Sales Promotion Center and Spicy Communication, we were awarded **1 Gold** and **1 Silver** in the category **Corporate Conference Best Corporate Awards** for two corporate conferences where creative concept and brand interpretation turned our corporate activities into high specifications events. We also won the **Silver award** in the category **Brand Event** for the sponsorship of the Run Greece racing events held in 6 cities across Greece. The development of relations with the local government, social solidarity institutions, local media, the activation of WIND stores with exclusive promotions, the labeling and promotion of our brand in all cities where Run Greece took place, were actions that stood out in a category with strict criteria.

### • Sales Excellence Awards 2016

WIND won the Gold Award in the category **Innovative Digital Channels** for the candidacy **Interactive POS WALL - Interactive monitors** with our new Digital Stores at the Sales Excellence Awards held every year by the Sales Institute in Greece (IPE) in cooperation with Boussias Communications, aiming at awarding the best sales practices in all business sectors in Greece.

### • Digital Media Awards 2016

WIND Hellas won the **Gold award** in the category **Best Public Service / CSR Award** for the Facebook page of our campaign Kids@Safety on safe Internet use by children.

### • Social Media Awards 2016

We won the Silver award at the Social Media Awards 2016, in the category "Internal Communications" with the platform WIND SALES CLUB.



**Event Awards**



**Sales Excellence Awards**



**National Customer Service Awards**



**National Corporate  
Responsibility Index CR Index &  
Digital Media Awards**



**Social Media Awards**





# CORPORATE RESPONSIBILITY

We do business Responsibly

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

## AT A GLANCE

44 IMPORTANT ISSUES IDENTIFIED  
FOR THE COMPANY AND OUR  
STAKEHOLDERS | 5 BEST  
PRACTICES TO PARTICIPATE IN THE  
BRAVO DIALOGUE INSTITUTION |  
WE CONNECTED OUR SUSTAINABLE  
DEVELOPMENT GOALS TO OUR  
BUSINESS OPERATIONS

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## Our approach

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

We believe that Corporate Responsibility is not a "luxury"; it is part of our business strategy that takes into account society and assesses opportunities, as well as the risks that may exist in our industry.

We support society with resources as well as with actions of a multifaceted nature; thus contributing to the increase in the standard of living and increase in participation.

This strategy is a positive reflection on our Company's reputation and image and creates relationships of mutual understanding with our Stakeholders, supporting the fulfillment of our corporate objectives.

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## Our Corporate Responsibility Strategy

The telecommunications industry is rapidly evolving in the digital age. Organizations must form their strategy on development by ensuring that they understand and manage the risks for their activities in society and the environment and being in line with opportunities and prospects for growth with a positive impact on their Stakeholders.

Therefore, at WIND we systematically attempt to respond to the challenges:

### Economic crisis

- We value our customers and constantly strive to improve customer service
- Quality in service
- Service improvement

### Climate change

- We reduce our electricity consumption
- We promote the use of "green" products in our customers

### Safety in use

- Informing parents and children
- Investments in network security
- Protection of personal data

### Digital communication

- Plans for special needs persons
- We support social support lines

### Need for communication

- Network investments

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

Thus, we are committed to:

### Society

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

### Employees

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

### Market

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

### Environment

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

# We promote the Sustainable Development Goals

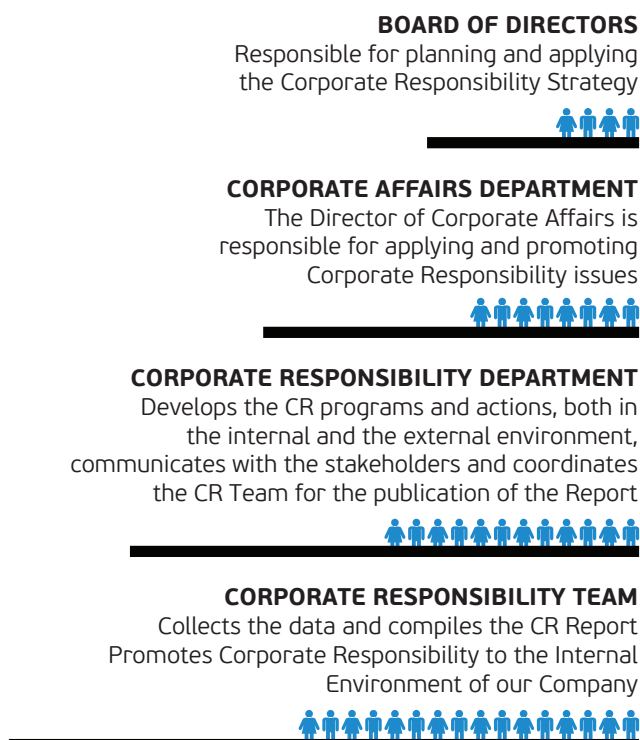


At WIND Hellas we have adopted the United Nations agenda with the 17 Sustainable Development Goals (SDGs) by 2030 and are determined to contribute actively and effectively to promoting the well-being of society, fighting poverty and protecting the environment.

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

Specifically, the association and practical adoption of the UN Sustainable Development Goals with our programs and actions in the context of our Corporate Responsibility strategy is presented in detail in the related Table on pages 100-101.

FIGURE 1.  
CORPORATE RESPONSIBILITY  
GOVERNANCE STRUCTURE



## Governance Structure of our Corporate Responsibility

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

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

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

# Our Stakeholders

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

## Dialogue with Stakeholders

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

Table of Dialogue Development with our Stakeholders 2016

Table 3.1

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

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\* **1** On an ongoing basis | **2** Regularly | **3** Periodically (2-4 times a year) | **4** On an annual basis | **5** On a case by case basis

	<b>Stakeholders</b>	<b>Two-way Communication</b>	<b>Priorities - Dialogue Issues</b>
<b>EXTERNAL ENVIRONMENT</b>	Customers (Individuals - Businesses)	Customer Satisfaction Surveys (2) Focus Groups (5) Customer Service Center (1) Online Communication (1) Corporate Image Survey (3) Complaint Telephone Line (1)	Technical Issues on Products & Services Communication Coverage Quality of Services Telecommunications Charges E/M Radiation
	Academic Community	Support to Scientific Programs (2) Educational Seminars (5) Information Days (5)	E/M Radiation Safe use of the Mobile Phone and the Internet Education Innovation Health & Safety
	Media	Press Conferences (2) Media Trips (4) Field Trips (3) Meetings (1) Press Releases and Presentations (1)	Management Financial and Commercial Results Regulatory Matters Quality of Services and Network Coverage, Infrastructure, Technology and 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
<b>INTERNAL ENVIRONMENT</b>	Shareholders	Scheduled Shareholder Meetings (5) Targeted Communication (2)	Financial Growth / Results Management Investment Plan Strategic Choices Socioeconomic Developments
	Employees	Employee Opinion Surveys (4) WIND News (1) Intranet (1) Organization of Events (2) Meetings with Employees Union (1)	Education Health & Safety Equal Opportunities for Professional Development
	Commercial Network	Extranet (Communication Systems) (1) Commercial Conferences (3) Meetings with Sales Executives (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

\* **1** On an ongoing basis | **2** Regularly | **3** Periodically (2-4 times a year) | **4** On an annual basis | **5** On a case by case basis



# We Approach Important Issues Responsibly

## Materiality Analysis

At WIND Hellas we continued to analyze the important issues concerning the Company and with the greatest impact to our Stakeholders, which we had implemented three years ago.

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

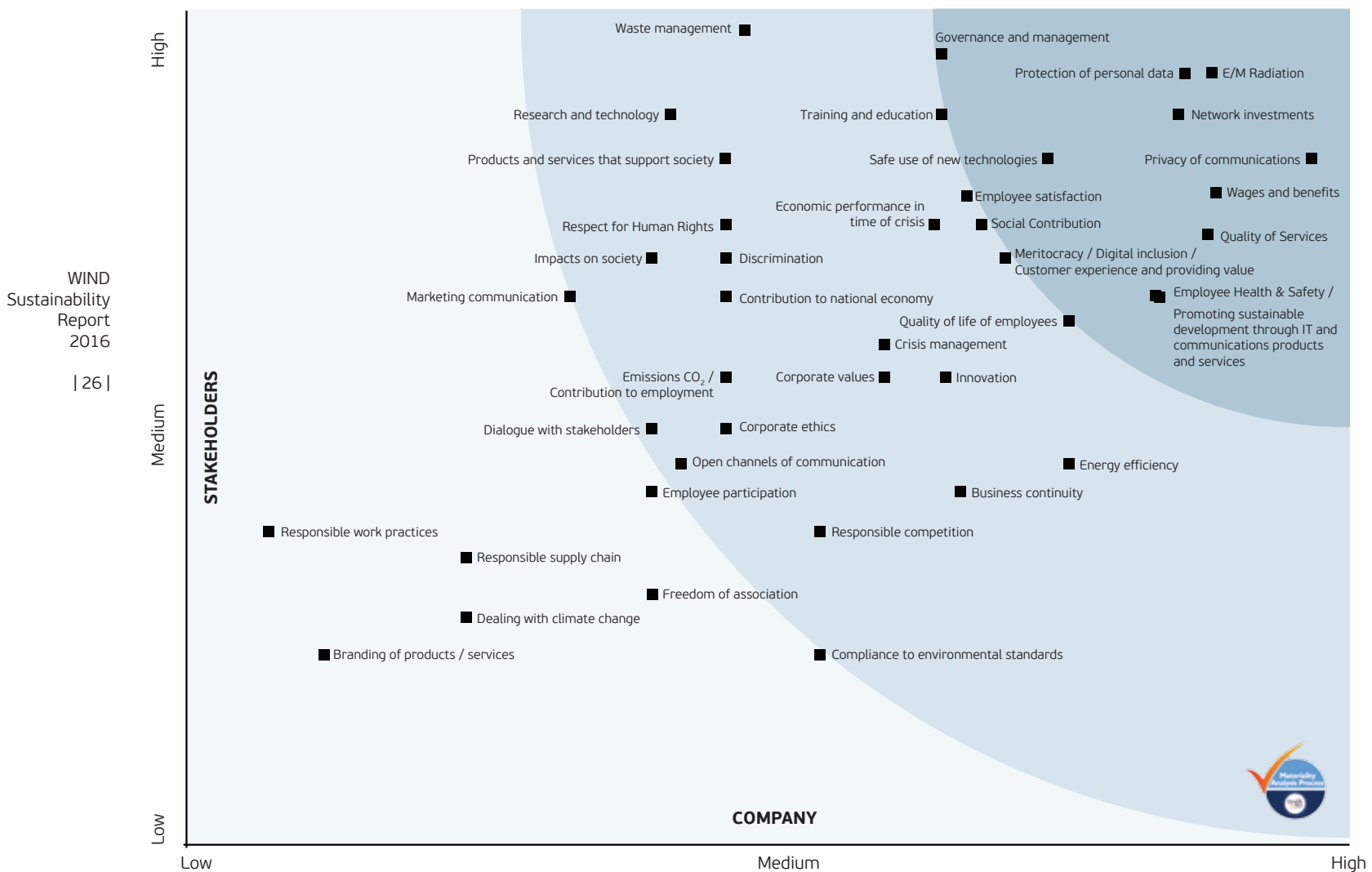
The first stage involved identifying the important issues concerning the Company and the telecommunications sector, through desk research and studying reports of similar companies both in Greece and internationally. Next, we conducted a series of interviews with executives of the Company and meetings with management executives in order to prioritize the issues based on the Company's

targets and their importance for the internal and external matters. Finally, we held a structured workshop involving dialogue between representatives of our Stakeholders, during which there was discussion and prioritization of issues that had the greatest impact to these groups based on their perception.

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

Following is a presentation of the key sustainability topics that have significant impact on WIND and our Stakeholders.

FIGURE 3.1: MATERIALITY MATRIX



The vertical axis shows the significance of issues as determined by our Stakeholders and the horizontal axis shows the assessment of the impact of significant issues by the company in relation to the Sustainable Development goals.







## We promote Responsible Entrepreneurship and Technological Innovation

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

Thus, in 2016 we participated:

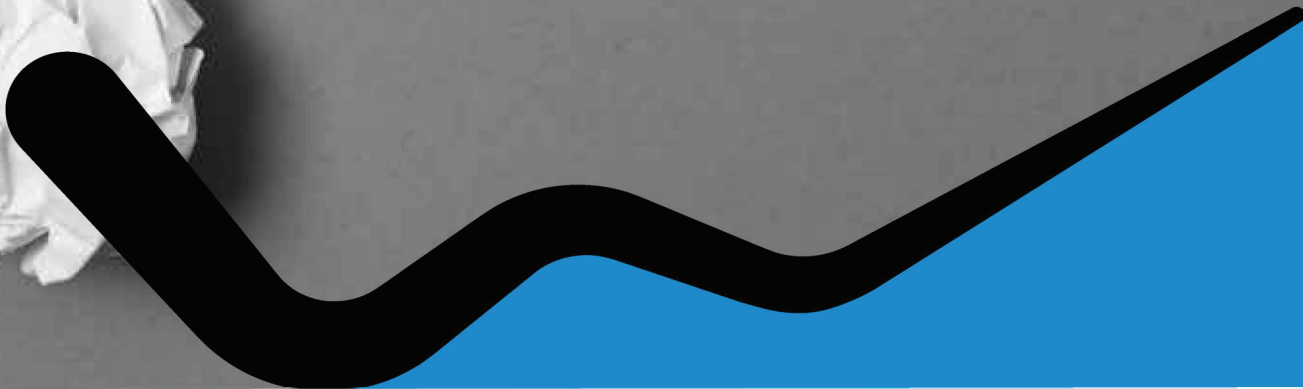
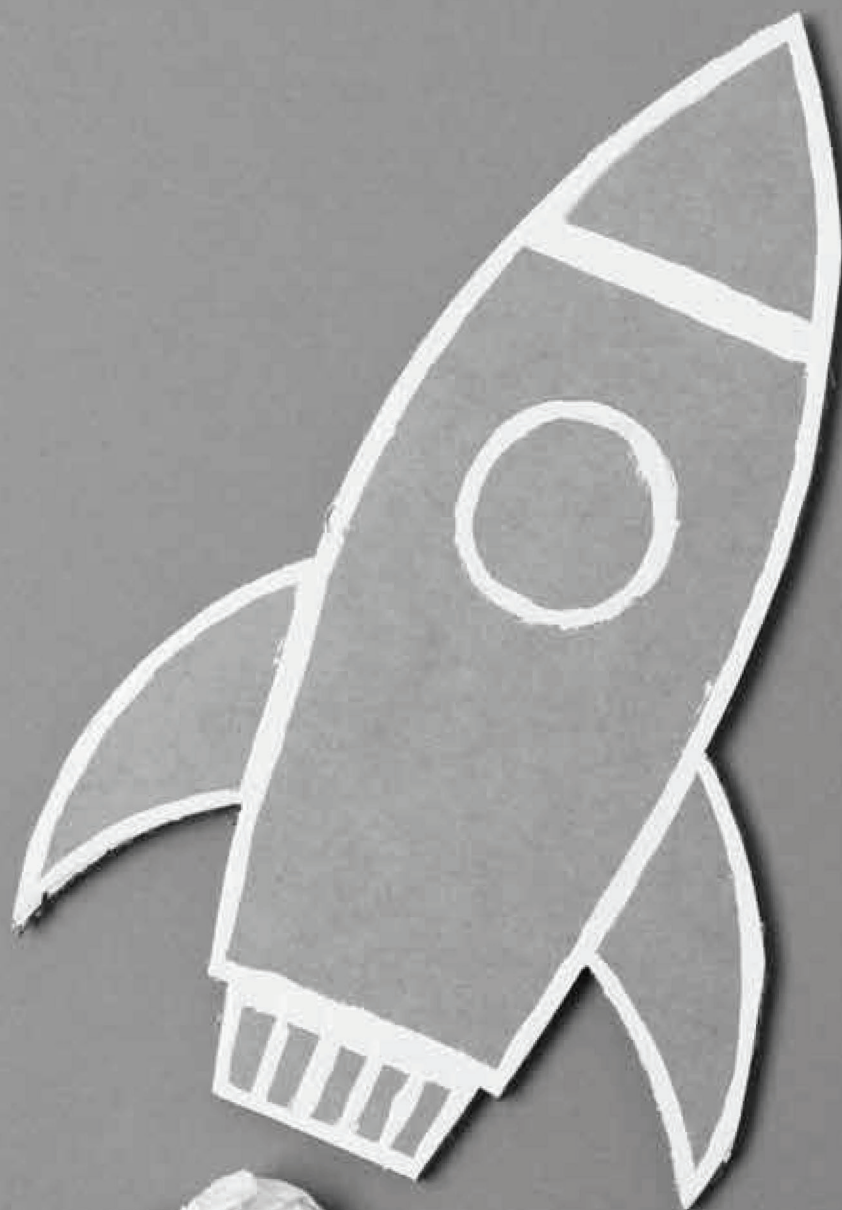
- 19<sup>th</sup> KPMG Human Resources Symposium - Ioanna Tsitoura, Chief HR Officer
- 7<sup>th</sup> Infocom Albanian Telecom Forum – Antonis Tzortzakakis, Chief Officer, Fixed Line & B2B
- Sustainable Greece 2020 – George Tsaprounis, Corporate Affairs Executive Director

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### Key Sustainability Topics

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



# CORPORATE GOVERNANCE

We do business responsibly

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

## AT A GLANCE

220 FUNCTIONS WERE EVALUATED  
DURING THE RISK ASSESSMENT  
PROCEDURE  
| 130 RECOMMENDATIONS  
OF THE INTERNAL AUDIT DIVISION  
WERE IMPLEMENTED AFTER THE  
COMPLETION OF THE INTERNAL  
AUDIT PROGRAM  
| 12 TRAINING SESSIONS  
FOR ALL EMPLOYEES  
WITHIN THE FRAMEWORK  
OF THE CODE OF CONDUCT  
| APPLICATION OF ISO  
19600 TO THE REGULATORY  
COMPLIANCE SYSTEM

## Our approach

Being faithful to our commitment for Responsible Entrepreneurship, we proceeded in 2016 in carefully planning our actions, through responsible practices, audits and evaluation of our daily operations. We adopted new policies and practices in order to simplify our procedures and respond more efficiently to our customers.

## Responsible Management

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

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

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

### INTEGRITY

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

### SIMPLICITY

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

### FLEXIBILITY

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

### ENTREPRENEURSHIP

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

### TEAMWORK

I actively and positively support my team. I help so that everyone's potentials are highlighted and exploited.

## Our Policies

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

**Quality Policy:** describes the Commitment and Values of the Company, which are applied throughout its operations.

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

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

**Business Continuity Management Policy:** describes our commitment in relation to our ability to be able to continue all our critical operations and to provide uninterrupted to our customers the critical services, in case of an event which could negatively impact important business units, systems, and services.

## Management Practice

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

### Board of Directors

The management and representation of the Company and the management of its assets falls under the authority of the Board of Directors, which may consist of three (3) to fifteen (15) members.

The current Board of Directors (BoD) of the Company consists of the Chairman and two Members. The Chairman of the Board of Directors also acts as CEO. The BoD members take part in its regular meetings and jointly decide on the items on the agenda.

In 2016, the BoD was comprised of the following members:

- Athanassios Zarkalis, Chairman of the BoD and CEO
- Georgios Rallis, Executive Member
- Nikolaos Costaras, Executive Member

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

### Communication with the Management

In order to decide on a strategy for implementing the Company's investment plan, we communicate with the Company's shareholders systematically, at regular time periods, with the aim of informing them directly about the Company and the Greek market in general. The constructive two-way communication between the Employees and the Board of Directors continues.

Our goal is to keep everyone abreast of Company related developments at all points in time, to the effective handling of the issues and needs arising at a human resources level, to reinforce teams collaborating with each other and help tap into the power of constructive dialogue.

Within this context, in 2016 meetings were held between the CEO with executives from all departments of the Company.

FIGURE 4.1  
ORGANIZATIONAL STRUCTURE

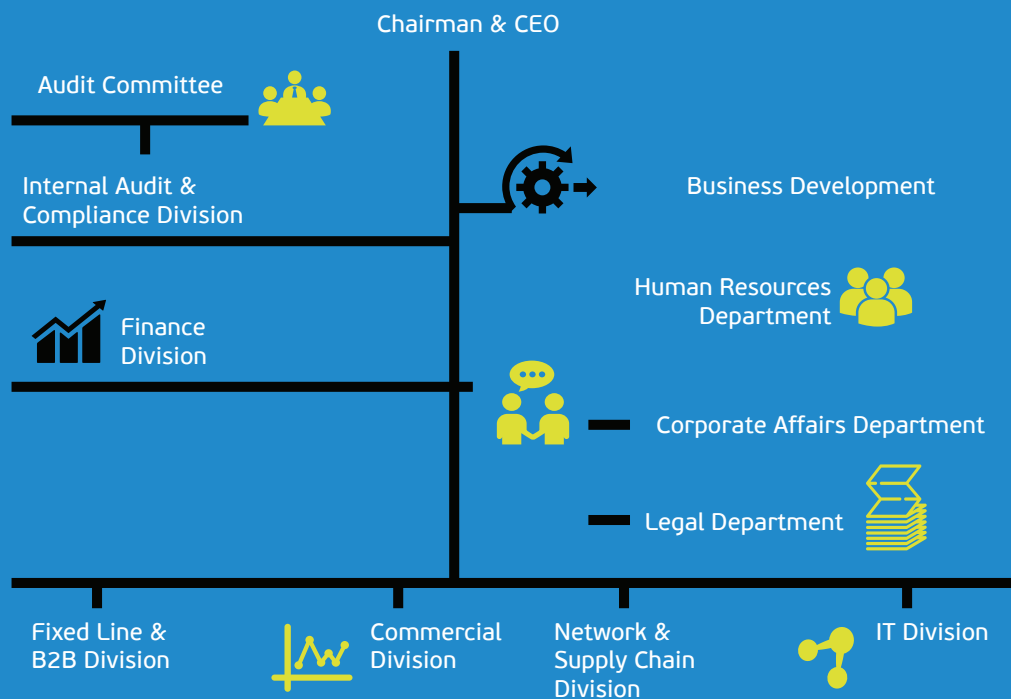
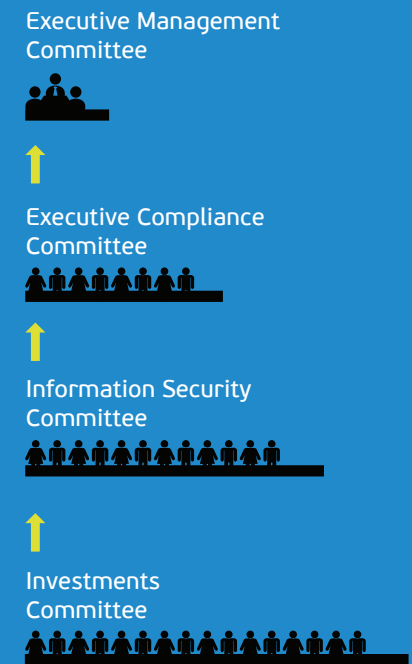


FIGURE 4.2  
COMMITTEES



## Committees

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

### Executive Management Committee

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

### Executive Compliance Committee

The main aim of the Executive Compliance Committee is to monitor the Compliance Management System. It deals with compliance issues affecting internal and external functions of the Company with respect to its principles and values, the implementation of the Code of Conduct

as well as issues of corporate governance. It consists of the CEO, the Chief HR Officer, the Legal Adviser, the Chief Commercial Officer and the Internal Audit & Regulatory Compliance Officer.

The Committee met three times in 2016 on issues concerning implementation of the Code. The Committee's decisions included:

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

### Information Security Committee

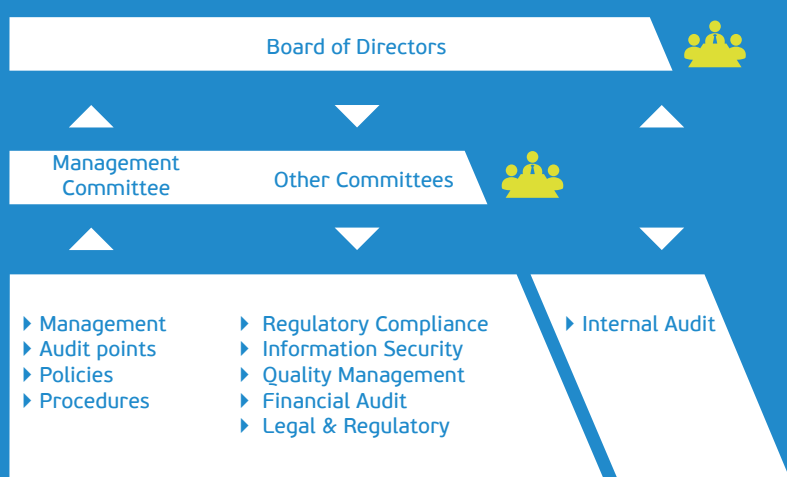
The Information Security Committee meets at regular intervals aiming at the creation of a corporate Information

Security Policy and its implementation by the employees, in order to ensure security, confidentiality and integrity of information. The Committee is the central body of the Company that manages the Information Security Policy and may propose corrective actions aimed at maintaining and strengthening the information security audit mechanism through the procedures and systems of the Company. The Committee met in 2016 on issues related to the implementation of the Information Security Policies and the new Regulatory Requirements. The Committee is comprised of the CEO, the Chief Information Officer, the Chief Network Officer, the Senior Executive Corporate Affairs, the Information Security and Protection of Personal Data Officer and the Internal Audit & Regulatory Compliance Officer.

### Investments Committee

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

FIGURE 4.3  
CORPORATE GOVERNANCE STRUCTURE THE CORPORATE GOVERNANCE STRUCTURE OF WIND HELLAS FOLLOWS THE '3 LINES OF DEFENSE' MODEL



## Internal Audit & Risk Assessment

The **Internal Audit & Compliance Division** is responsible to provide reasonable independent assurance to the Board of Directors of the parent Company that the Internal Audit System ensures compliance with Company policies, practices and procedures. This is accomplished by assessing the effectiveness of risk management systems, controls and governance practices. No conduct was observed in 2016 that would hinder the objectives and work of Management.

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

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

The identification and assessment of risks has been recognized as being a management tool that helps in better managing risks, taking proper decisions and achieving the corporate objectives. The results of the annual risk

identification and assessment on a Company level and management level, were presented in the first quarter to Management.

The Internal Audit & Compliance Division continues for the third year to apply the strategic plan, which describes actions to improve the company's operations as these were identified by the external assessment carried out by the company PwC. The Internal Audit & Compliance Division, even though it was assessed as "Generally Conforms", aims at its constant improvement and with the purpose of being subjected to a new external assessment upon completion of the three-year plan. The risk assessment procedure is fully updated and automated, in the context of the annual audit plan design through the software Teammate. **The management team's response percentage reached 99% in the last risk assessment procedure.** More than 220 functions were evaluated by more than 110 members of Senior and Line Management. The methodology followed for risk assessment is updated and fully in line with best practices.

The Internal Audit Division carried out a series of audits, regular and extraordinary, based on the plan that was approved by the Audit Committee of the parent company. More than 97% of the plan was completed within the year, including the extraordinary audits that were decided during the course of the year.



## Code of Conduct

WIND's Code of Conduct is based on 5 interconnected axes.

**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".

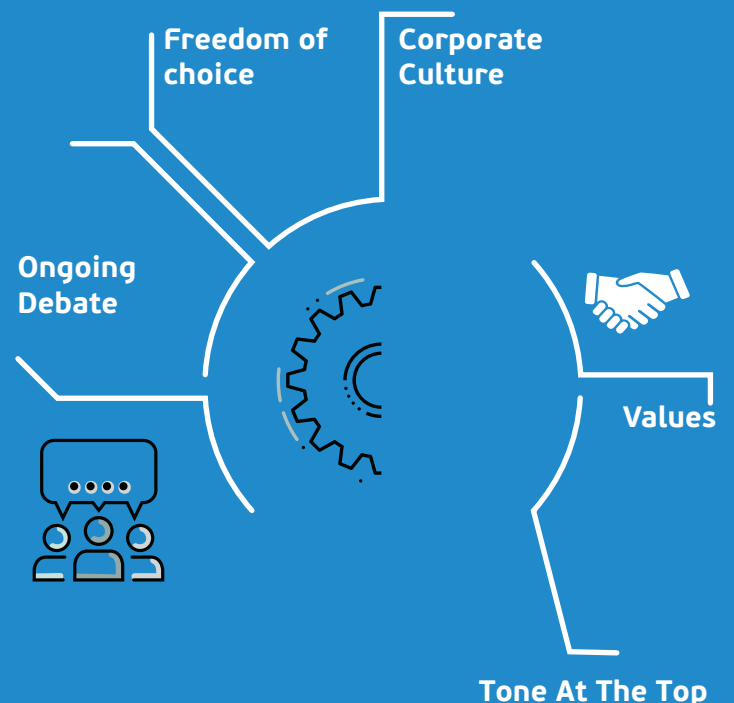
**TONE AT THE TOP:** Continuous support in all its forms by the senior and executive management.

**ONGOING DEBATE:** Issues related to the implementation 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 unethical practices issues.

**CORPORATE CULTURE:** Establishment of a uniform corporate culture which shall make the Code part of our everyday conduct.

FIGURE 4.4  
CODE OF CONDUCT AXES





We operate under the **“WIND Hellas Code of Conduct”**, in order to create the right framework in line with the principles of good faith, business ethics and professional ethics, in order to give the opportunity to all employees to acquaint themselves with the rules and principles of good practice and ethics that we have adopted.

The Code of Conduct sets out the relationships both among our employees and any third party they contact in the context of their work. At the same time, we have developed communication channels for named or anonymous complaints of breaches of the Code. Complaints can be made either online through the e-mail address **codeofconduct@WIND.gr** or by mail at the **Post Office Box: WIND Hellas, PO Box 61336, 151 04 Maroussi, Athens, Greece.**

In 2016, 18 reports were sent by mail or electronically. The majority of issues concerned customer complaints, relations with third parties and internal harassment. The expected internal investigation procedures were followed and found that in one case the Company should reinforce its policies and the education of its employees and executives.

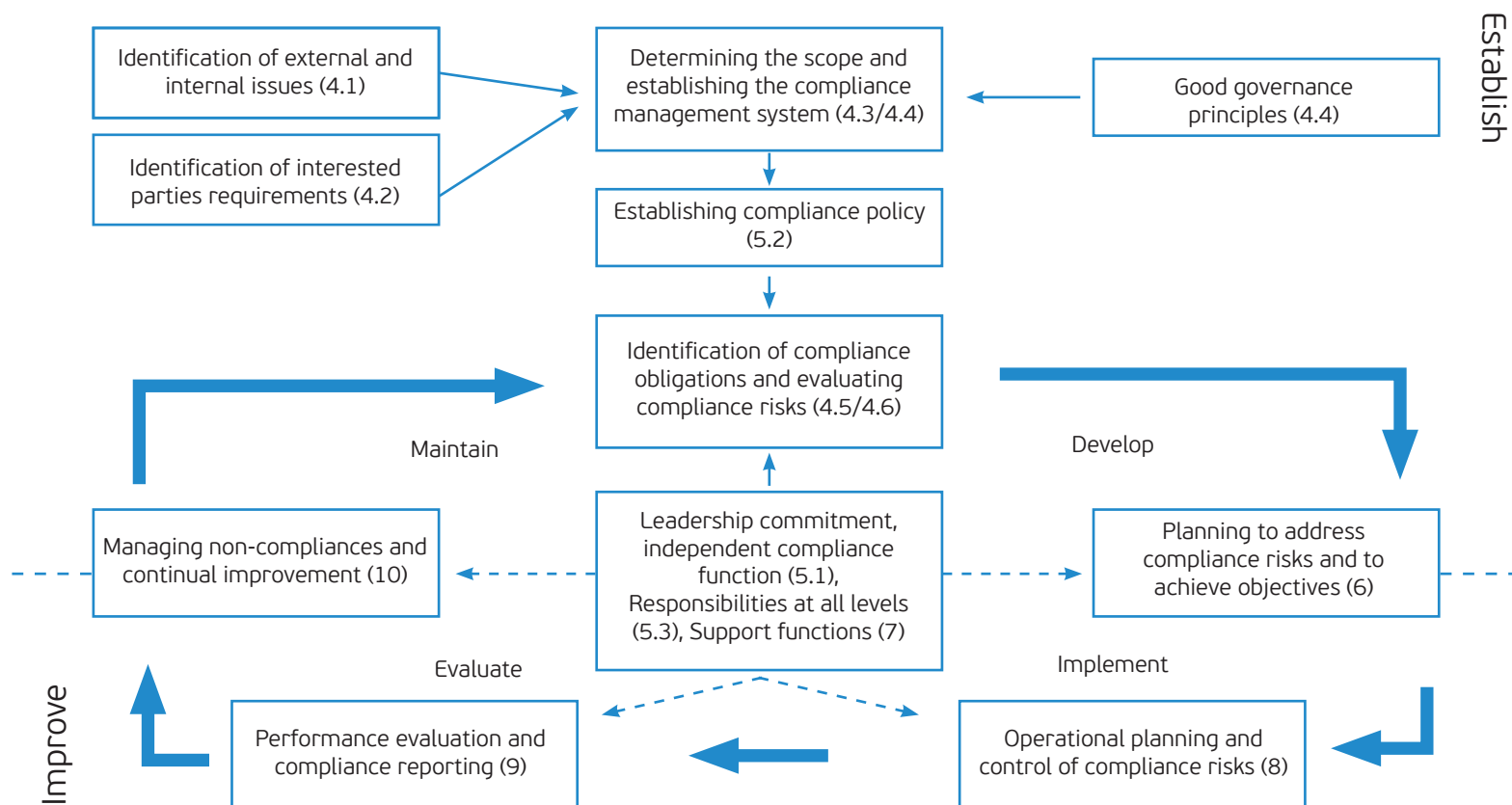
**The main actions within the context of the Code of Conduct were:**

**The application of ISO 19600 to the Regulatory Compliance System**

In 2015, the Executive Management Committee decided to proceed to the adoption of the ISO 19600 Compliance Management Systems. Thus, during 2016 we worked to adapt to the standard’s requirements, which is not subject to certification. The specific standard gives a framework for the application of the requirements related to compliance. It provides guidance for the creation, development, application, assessment, maintenance and improvement of an effective and responsive compliance management system.

With the application of ISO 19600 we aim:

- at creating a common framework of compliance throughout the Company
- at reinforcing the compliance image to our shareholders, the authorities and other stakeholders
- at improving the compliance processes, such as education, awareness and monitoring
- at the complete identification and assessment of compliance risk areas, with the proper focus of financial and human resources
- at reinforcing sustainability



Flowchart of a compliance management system

## Employee education

With the goal of reinforcing even further the message of the integrity and ethical conduct of WIND Hellas we made a series of presentations and speeches to all WIND personnel. During the 2nd and 3rd quarter of 2016 we held more than 12 educational sessions for all Company employees (executives and staff) on "Harassment in the workplace". These included:

- The definition of harassment (bullying) in the workplace, as this is defined by the company.
- What is considered ethical, legally acceptable, liable for WIND and society as a whole
- Examples of "Bullying and Harassment" for the individual
- What is not harassment but a normal conflict
- Corporate reaction to harassment
- Actions to reduce negative conduct

Further, educational material was prepared on Regulatory Compliance, the Code of Conduct and Combating Fraud and was delivered to the management of the stores. Train-the-trainer was conducted, so as to inform the employees of the stores on these issues.

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

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

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

### **Fraud Response Policy with main directions:**

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

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

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## Management Systems & Certifications

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

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

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

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

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

**Quality:** EN ISO9001:2008

- Initial certification: 2001  
Certificate Registration No. 04100011460
- Last certification renewal: 2014  
Certification Body: TUV Hellas (TUV Nord Group)

**Environment:** EN ISO14001:2004

- Initial certification: December 2008  
Certificate Registration No. 44104090360-000
- Last certification renewal: June 2015  
Certification Body: TUV Hellas (TUV Nord Group)

**Measurements of E/M Fields: ISO 17025**

We design, implement and operate our network in line in consideration of the safety of services as well as the protection of the general population and the environment.

Specifically, we monitor the levels of electromagnetic radiation and cooperate with specialized High Frequencies Measurements Laboratories accredited in accordance with the requirements of the standard ELOT EN ISO/IEC 17025:2005 by the Hellenic Accreditation System (ESYD).

## Business Continuity Management

At WIND Hellas we have developed, maintain and constantly improve a Business Continuity System, within the scope of the constantly evolving telecommunications environment as well as the international standard ISO 22301:2012 (Social Security Business Continuity Management System), with the following main objectives:

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

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). At the same time, and recognizing the importance of ensuring the availability of telephone services to the public, we apply Business Continuity policies, procedures, measures and plans that contribute to the uninterrupted provision of services to our customers in cases of emergency and particularly in cases of destructive damage or force majeure.



### Crisis Management Procedure

Following the Internal Audit proposal, we are preparing a comprehensive Crisis Management Plan (WHCMP) that will provide the management structure, the basic responsibilities and general procedures to be followed before, during and immediately after a crisis. Its implementation is currently underway and is expected to be completed in 2017.

### Simplification

With the motto "One of your ideas has the power to simplify our company's procedures. Just share it!" and aiming at promoting the value of simplicity in everything we do, the program "See things simply" continued for the 4th year. Having already been established as an effective channel to promote and implement the ideas of our employees to simplify and improve customer experience, in 2016 we collected more than 40 employee proposals that were evaluated and many of these were en route to being implemented.

In total we implemented more than 20 simplifications, improving many of our processes.



## SOCIETY

We support important goals

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

## AT A GLANCE

75,000€ TO SOCIAL ORGANIZATIONS THROUGH THE RUNNING MOVEMENT | 25 RUNS ORGANIZED ACROSS GREECE | 700 STRAY ANIMALS HAVE BEEN NEUTERED THROUGH THE ANIMAL ACTION PROGRAM | 120,479.96€ OFFERED FROM OUR SUBSCRIBERS TO ORGANIZATIONS THROUGH THE SUPPORT AND ASSISTANCE HOTLINES

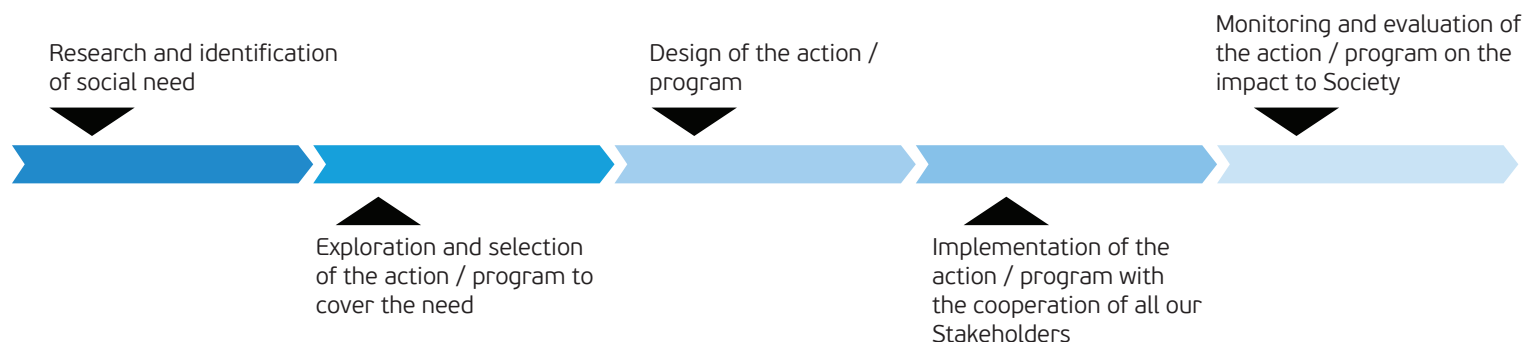


## Our approach

Our responsible activation toward Society is a strategic goal for each of our employees. Thus we contribute with all appropriate means, providing support to actions, organizations and people in need. So this year, we considered the needs of society as a whole and incorporated them in our corporate activity. We supported innovative ideas, athleticism, education and inspired in our fellow human beings - employees, customers and citizens - social solidarity and environmental consciousness.

## Participation, Awareness, Contribution

In 2016 we realized our social plan giving special emphasis in supporting actions and organizations so they are able to implement their plans; not only to be able to survive, but also to thrive. For one more year we worked with consistency on the basis of a triple axis of action: participation, awareness and contribution.



### **RUNNING MOVEMENT** Thousands of Participants, a Great Cause

- 25 Races throughout Greece
- 75,000€ to 10 social organizations
- 120,800 Runners
- 7 Athletes
- 20 Ambassadors

#### **Athens Marathon & Thessaloniki International Marathon "Alexander the Great"**

By reinforcing concepts such as that of participation and social contribution we gave the ability to subscribers and friends to run under the colours of WIND and the WIND Running Team, in many running events during the year, culminating in the Authentic Marathon of Athens and the Thessaloniki International Marathon "Alexander the Great".

Top athletes made up our team making us proud not only for their excellent performance, but also with their talent, dedication, consistency and the high goals they set:

**Magda Gazea, Kostas Gkelaouzos, Markos Gkourlias, Anastasia Karakatsani, Anastasia Marinakou, Georgios Dialektos, Glykeria Tziatzia.**

#### **RUN GREECE**

The institution RUN GREECE remains special; organized by SEGAS in cooperation with the local government and the sponsorship of WIND for the 4th consecutive year. In 2016 it managed to literally get more than 22,000 runners out of their homes; runners of all ages, transforming each city (Larissa, Heraklion, Ioannina, Kastoria, Alexandroupoli and Patras) into a great celebration of athleticism and participation. We utilized this dynamic since we managed to leave behind a great social impact, offering 12,000€ in total to 6 local social solidarity organizations.

## THE CHAMPIONS OF THE WIND RUNNING TEAM



**Markos Gkourlias**



**Magda Gazea**



**Kostas Gkelaouzos**





**Anastasia Karakatsani**



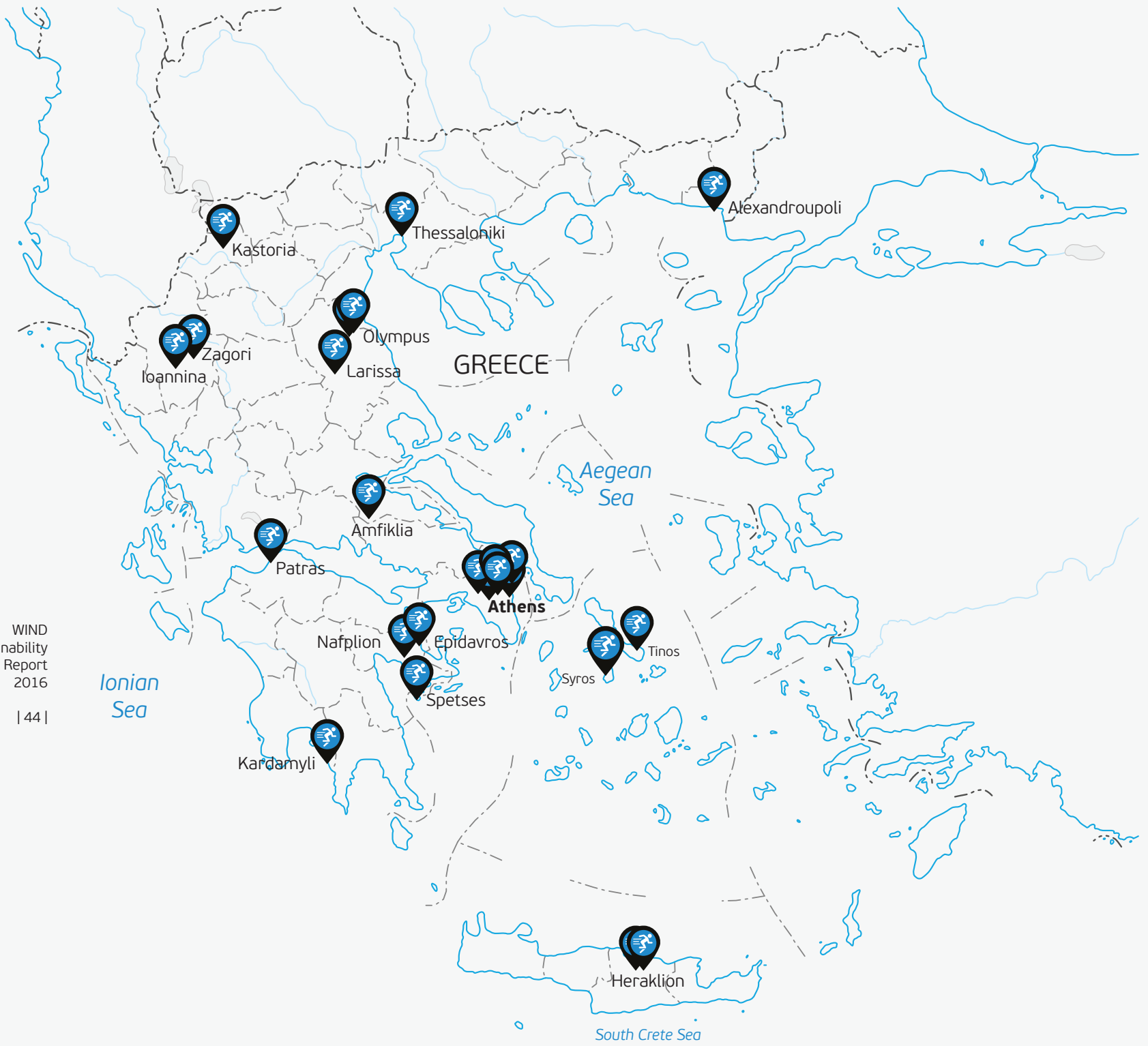
**Anastasia Marinakou**



**Georgios Dialektos**



**Glykeria Tziatzia**





## Races in 2016

- **14/2/2016** Love Run Heraklion, Crete [www.loverun.gr](http://www.loverun.gr)
- **21/2/2016** Spiros Louis Maroussi, Athens [www.spirosloisirun.gr](http://www.spirosloisirun.gr)
- **6/3/2016** Nafplion Marathon [www.nafpliomarathon.gr](http://www.nafpliomarathon.gr)
- **20/3/2016** Athens Half Marathon [www.athinahalfmarathon.gr](http://www.athinahalfmarathon.gr)
- **27/3/2016** Run Greece Larissa [www.run-greece.gr](http://www.run-greece.gr)
- **27/3/2016** Taygetos Challenge Kardamyli, Peloponnese [www.trailproject.gr](http://www.trailproject.gr)
- **3/4/2016** Thessaloniki International Marathon "Alexander the Great" [www.atgm.gr](http://www.atgm.gr)
- **10/4/2016** Street Relays, Glyfada [www.vikos.relays.gr](http://www.vikos.relays.gr)
- **17/4/2016** Run Greece Heraklion [www.run-greece.gr](http://www.run-greece.gr)
- **24/4/2016** Parnassos Path, Amfiklias [www.dionysosamfiklias.gr](http://www.dionysosamfiklias.gr)
- **8/5/2016** Run Greece Ioannina [www.run-greece.gr](http://www.run-greece.gr)
- **15/5/2016** Run Greece Kastoria [www.run-greece.gr](http://www.run-greece.gr)
- **28-29/5/2016** Tinos Challenge [www.tinoschallenge.gr](http://www.tinoschallenge.gr)
- **18/6/2016** Syros Run [www.syrosrun.gr](http://www.syrosrun.gr)
- **26/6/2016** Olympus Marathon [www.olympus-marathon.com](http://www.olympus-marathon.com)
- **26/6/2016** Epidavros Race
- **24/7/2016** The North Face Zagori Mountain Running [www.zagorirace.gr](http://www.zagorirace.gr)
- **25/9/2016** Run Greece Alexandroupoli [www.run-greece.gr](http://www.run-greece.gr)
- **2/10/2016** Nea Smyrni Historic Run [www.neasmirnihistoricrun.gr](http://www.neasmirnihistoricrun.gr)
- **9/10/2016** Spetses Mini Marathon [www.spetsesmarathon.com](http://www.spetsesmarathon.com)
- **9/10/2016** Run Greece Patras [www.run-greece.gr](http://www.run-greece.gr)
- **13/11/2016** Athens Marathon. The Authentic [www.athensauthenticmarathon.gr](http://www.athensauthenticmarathon.gr)
- **11/12/2016** The TOC Merrython [www.thetoc.gr](http://www.thetoc.gr)
- **11/12/2016** Olympus Winter Marathon [www.olympus-marathon.com](http://www.olympus-marathon.com)

## Kids@safety: Internet, Mobile and Child

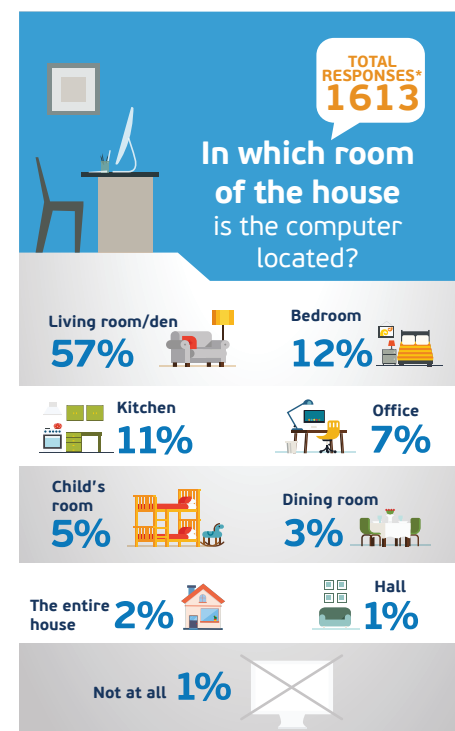
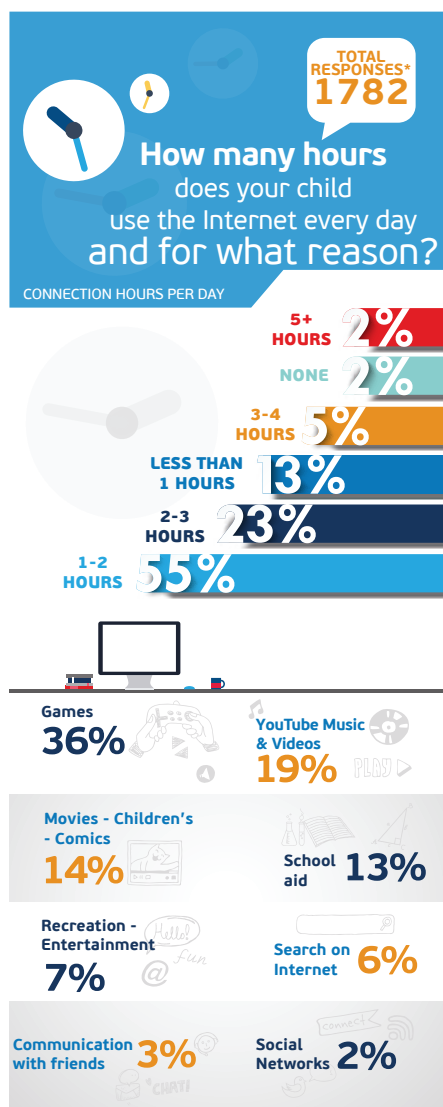
6 years close to parents and their children on the proper use of new technologies

Recognizing the need to inform parents, teachers and children on the safe use of new technologies, since 2010 we have been implementing the campaign «**Kids@safety: Internet, Mobile and Child**» focusing on the need to become familiar with new technologies, but also how to handle the challenges of the digital world. Promoting the positives aspects of new technologies as tools in our daily lives and encouraging the dialogue between children and parents on the safe use of the Internet are separate, albeit equally important goals of the campaign. The basic axis of the campaign kids@safety is the website: **www.kidsatsafety.gr**, supplemented by the respective social media sites on Facebook & Twitter that expand the channels of communication and utilize the advantages of the digital era in information and communication.

Toward the same direction, in 2016:

- We were one of the major sponsors of the Workshop held by the Cyber Crime Unit of the Hellenic Police at the Vellidion Conference Center in Thessaloniki.
- We expanded the presence of the campaign in the social media through our pages with the same name on Facebook and Twitter.
- We continue to be 'present'; participating and supporting conferences, speeches and workshops with the goal of transmitting the message as loud as possible for a better and safer internet for our children.

The campaign "**Kids@safety: Internet, Mobile and Child**" cooperates with the Cyber Crimes Unit as exclusive sponsor of the website **www.cyberkid.gr** and the respective Mobile app, Cyberkid.



## TEDx throughout Greece

▶ 7th year ▶ 12 events ▶ 4,000 viewers ▶ 200 speakers

This year we continued a series of TEDx events held throughout Greece. The goal of TED is with the power of ideas to mobilize people, to change their lives and the world. In this way we support people that are special, inspire and help form a better world. TED is a non-profit organization devoted to promote ideas worth spreading. In 2016, we supported twelve TEDx events throughout Greece. More than 200 speakers showed what is truly of value, to a public that exceeded 4,000 viewers.



- TEDx Alexandroupolis 13/2
- TEDx AUEB 5/3
- TEDx Panteion University 19/3
- TEDx Thessaloniki 2/4
- TEDx University of Aegean 9/4
- TEDx Chalkida 9/4
- TEDx Patras 14/5
- TEDx University of Ioannina 14/5
- TEDx University of Piraeus 14/5
- TEDx Academy 1/10
- TEDx Rhodes 3/9
- TEDx Chania 26/11

## ANIMAL ACTION

▶ 2011-2016 ▶ 700 animals

Since 2011, WIND has been standing by the side of ANIMAL ACTION, a recognized Panhellenic Animal Welfare Organization, by supporting their Veterinary Team of Neutering and Veterinary Care of Stray Animals operating throughout Greece.

Since 2011 more than 700 dogs and cats have been neutered, confirming that neutering is the only humane and scientifically proven way to manage stray animals.

## Institution: WIND BUSINESS DAY

▶ 3rd year ▶ 35 participants ▶ telecommunications and marketing workshop

For the 3rd consecutive year we participated in the Business Days institution in the context of the Entrepreneurship and Career Panorama held by the Research Center of Strategic Business Management and Entrepreneurship. At the company's facilities at Athinon Avenue and in 8 hours, the 35 participants had the opportunity to be informed of the structure and operation of WIND Hellas, followed by a workshop on current issues related to the telecommunications and marketing industry. The main purpose was for university students to become acquainted with the business world and the job market, particularly in the sector of telecommunications.

## Social Product

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

### WIND CARE

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

#### Social Contribution Lines

- [The "I Offer" service](#)

This is a joint charitable initiative of the three mobile telephony operators in Greece, which began in February 2006. The service involves the activation of a common 5-digit number for a specific period of time; during which mobile subscribers are able to send as many SMS they wish (at a cost of 1€ plus VAT). Thus, they are able to support a Non-Profit-NGO every time they do so. In 2016 the service was activated 17 times. The total net revenue (excluding VAT) generated from the use of the service is given to the eligible organization or institution that organized the charitable event, without any deduction. The amount collected in 2016 through the "I Offer" service for various organizations was 48,205€ (not including VAT).

- [SOS Children's Villages](#)

Our subscribers are able to donate 2€ to the SOS Children's Villages by calling the number 14567 or sending an SMS to the number 19820. In 2016 WIND subscribers donated 2,284.89€ to the SOS Children's Villages (not including VAT).

- [Arc of the World](#)

Our subscribers can donate 2€ to the Arc of the World by sending an SMS to 19888 or 19828. In 2016 our subscribers donated 16,126.25€ (excluding VAT) to the Arc of the World.

- [ELEPAP](#)

Our subscribers are able to donate 2€ to ELEPAP by sending an SMS to the number 54980 or 19811. In 2016 our subscribers donated 3,754€ (excluding VAT) to the ELEPAP.

- [Make a Wish Greece](#)

In 2016 our subscribers donated 242€ (excluding VAT) to Make a Wish Greece, donating 2€ by sending an SMS to the number 54042 or 19808.

- [Apostoli](#)

Our subscribers are able to donate 2€ to the NGO "APOSTOLI" by sending an SMS to the number 54484 or 19899. In 2016 our subscribers donated 61,08€ (excluding VAT).

## Help Lines

- “Amber Alert Hellas”

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

- “European help line for children”

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

- “SOS Line – The Smile of the Child”

We offer our subscribers the option of calling 1056 free of charge from their mobile, thus helping to deal with serious incidents in which children are the victims. Moreover, we provide them the option to donate 2€ through SMS to 19810 or 54020 and 2€ by calling 14545. In 2016, 49,806.74€ was given to the organization “Smile of the Child”.

## Emergency Lines

Through our network, we provide our subscribers the option of free calls to emergency numbers such as 100, 166, 199, 112, 197 and 108, even in case of barriers due to debts.







# EMPLOYEES

We develop our employees

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

## AT A GLANCE

987 EMPLOYEES | 98 NEW  
HIRES | 23,378 EMPLOYEE  
TRAINING HOURS | 85% OF  
EMPLOYEES PARTICIPATED IN  
THE SATISFACTION SURVEY  
| 2,000 EMPLOYEE PROPOSALS  
FOR THE NEW INTERNAL  
PROGRAM EY WIND

## Our approach

The social responsibility action of a company affects positively its relationship with its people; as confirmed by the annual employee opinion survey we conduct each year. In the last survey, 8 out of 10 company employees stated they were satisfied with the way the company contributes to society.

A necessary condition for success in the internal recognition of Corporate Responsibility is not only information but also the participation of our employees in all social responsibility programs and the company's volunteer action. At the same time, it is also our responsibility to incorporate new initiatives that concern our employees; focusing on actions that support employment, development, care, social responsibility and the reinforcement of our corporate culture. In this context, in 2016 we undertook the following activities:

- Design of internal programs to reinforce employee commitment
- Increase of education and development programs for all employees
- Increase of reward incentives and retention of talent
- Management of talent and diversity
- Optimization of organization and operation through simplification and redesign of procedures
- Maintaining programs for rewarding exceptional results
- Design and implementation of the internal activities and welfare program "EY WIND"
- Supporting events for all employees and their families
- Reinforcement of internal communication and dialogue

## Human Resources Data

At WIND Hellas, our ongoing goal is to attract, retain and develop professionals. Here, exceptional people who are passionate about learning and development in a dynamic environment of new technologies can make their way to an exciting career. During 2016, we contributed significantly to the economy of our country by employing 987 employees.

Employee distribution by department

Table 6.1

Department	Total employees
General Management and other Administrative departments (Internal Control, Legal and Regulatory, Corporate Affairs)	34
Human Resources Department	23
Consumer Marketing Department	267
Retail Sales Department	85
Fixed Telephony & B2B Department	133
Finance Department	95
IT Department	131
Network & Supply Chain Division	219
<b>Grand Total</b>	<b>987</b>

\* Data: 31/12/2016

Employee distribution by department and sex

Table 6.2

Department	Sex	Number	%
General Management and other Administrative departments (Internal Control, Legal and Regulatory, Corporate Affairs)	Female	20	58.82%
	Male	14	41.18%
<b>Total</b>		<b>34</b>	
Human Resources Department	Female	13	56.52%
	Male	10	43.48%
<b>Total</b>		<b>23</b>	
Consumer Marketing Department	Female	205	76.78%
	Male	62	23.22%
<b>Total</b>		<b>267</b>	

Department	Sex	Number	%
Retail Sales Department	Female	46	54.12%
	Male	39	45.88%
<b>Total</b>		<b>85</b>	
Fixed Telephony & B2B Department	Female	57	42.86%
	Male	76	57.14%
<b>Total</b>		<b>133</b>	
Finance Department	Female	58	61.05%
	Male	37	38.95%
<b>Total</b>		<b>95</b>	
IT Department	Female	32	24.43%
	Male	99	75.57%
<b>Total</b>		<b>131</b>	
Network & Supply Chain Division	Female	42	19.18%
	Male	177	80.82%
<b>Total</b>		<b>219</b>	
<b>Grand Total</b>		<b>987</b>	

\* Data: 31/12/2016

Our workforce is characterized by high academic level and specialization

#### Employee academic level

Post-graduate degree holders (including doctorates)	28%
University degrees holders	42%
Technical diplomas holders	17%

\* Data: 31/12/2016

**98.89%** of employees are employed under permanent employment contracts (of which **1.02%** are employed under part time employment contracts). The remaining **1.11%** of employees are employed under defined term employment contracts (of which one is a part time employment contract).

In 2016, we made **98** new hires, of which **10** concerned the region (Thessaloniki, Crete and Patras). The “open” jobs at our company are posted on our website [www.wind.gr](http://www.wind.gr), as well as on websites related to the job market, and in some related newspapers.

## Human Rights and Equal Opportunities

At WIND Hellas we follow policies of transparency, meritocracy and objectivity for a fair and reliable work environment. Our strategic approach and our philosophy is not restricted to numbers but is based on the principle of non-discrimination, equal opportunity policies and the recognition of every individual’s right to work.

Thus, we offer equal opportunities to all our employees throughout Greece, regardless of sex or other discrimination. Due to our equal opportunity policy 47.92% of our employees are female and 52.08% are male.

FIGURE 6.1  
DISTRIBUTION OF EMPLOYEES BY REGION

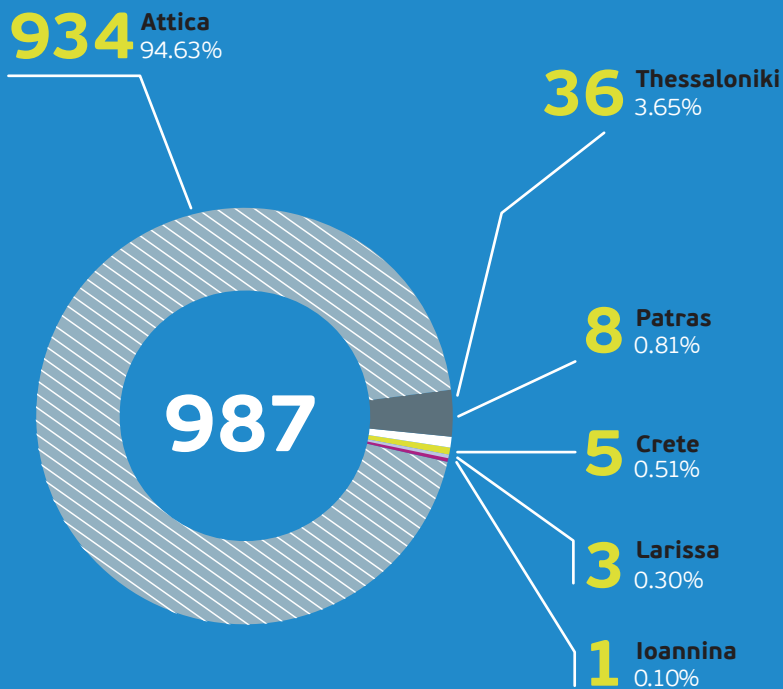


FIGURE 6.2  
DISTRIBUTION OF EMPLOYEES BY AGE

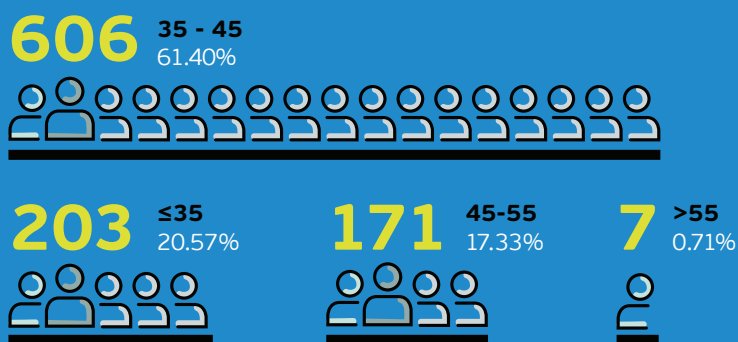
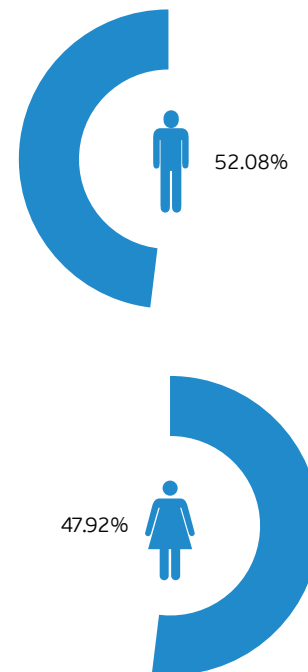


FIGURE 6.3  
DISTRIBUTION OF EMPLOYEES BY SEX



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

#### Freedom of Association

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

#### Internal Work Regulation

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

## Benefits

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

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

### Benefits Plan

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

### WIND win – WIND for you

At WIND we ensure for us and for our loved ones even better competitive prices, discounts and offers on all product categories, offering free data on our mobile, seasonal Bazaar with discounts and up to 98% discount on devices and accessories, as well as for products and services of our partners in various categories throughout Greece.

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

## Employee Health & Safety

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

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

	Losses in employees	Number of accidents (absence > 1 day)	Number of accidents (absence > 3 days)	Total days of absence from work
2014	0	1	3	185
2015	0	0	0	0
2016	0	0	0	0

To achieve the above, we apply an occupational health and safety system and intend to certify under the international standard (OHSAS 18001:2007) in 2017.

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

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

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

For 2017, we aim to publish an information leaflet and inform our employees on issues related to sitting for many hours at work, the importance of proper body posture and the provision of advice from the Occupational Physician to each employee individually.

Finally, with respect to the organization's response to emergencies we have specially trained teams for emergencies whose main responsibility in case of need is to care for the timely, safe and smooth evacuation of personnel, visitors, third parties and associates that may be inside our facilities. These teams are trained at regular intervals on matters

of fire fighting and first aid, as well as on emergency procedures by the experts on each issue; i.e. the Fire Department and the Safety Officer / Occupational Physician. The last training took place in November 2016 and in the new year will be repeated for all teams and drills for the evacuation of buildings will once again be scheduled.

### **Maternity leave**

In 2016 the number of employees entitled to maternity leave was **37** of which **36 used it (including cases where the maternity leave started in 2015 and continued into 2016)**. All working mothers who used their maternity leave returned to work normally.

## **Employee Growth and Development**

The human resources management philosophy at WIND Hellas is connected to the concepts of continuous training, encouragement and support of initiatives so as to form a high quality work environment of growth that respects and supports every employee's development.

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

### [Human Resources Development Procedure: Grow@WIND](#)

All of us at WIND are proud that the value of high performance and continuous improvement is the primary component of our culture. In February 2013, we created the human resources development procedure **Grow@WIND**, which is a tool that places emphasis on development and participation.

The purpose of the development procedure is:

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

In the context of the annual workshops for the best possible utilization of the procedure, in 2016 interactive workshops were held where the positive impact of the development procedure was discussed with respect to motivation, feedback, targeting, as well as the main points we can improve while applying the procedure so that it can become even more effective. Moreover, throughout the annual **Grow@WIND** procedure and to facilitate the formation of the Personal Development Plans we established the concept of the **Grow@WIND** week; during which meetings were held between employees and their supervisors solely with respect to the feedback procedure and the creation of the development plans.



## Training

Our key priority is the continuous training of our employees so that they can grow while improving their performance through **equal training opportunities** on the subject of their work. In 2016, we provided **23,378** hours of training on technical and managerial skills.

	Category	Hours of Training	Percentage	Average hours training / employee
2016	Upper level executives	1,343	5.75%	23.8
	Mid-level executives	4,285	18.33%	
	Technical Personnel	8,224	35.18%	
	Sales & Customer Service	4,206	17.99%	
	Remaining Personnel	5,321	22.76%	
	<b>TOTAL</b>	<b>23,378</b>	<b>100%</b>	
2015	Upper level executives	569	2.72%	21.41
	Mid-level executives	2,391	11.44%	
	Technical Personnel	8,714	41.71%	
	Sales & Customer Service	4,862	23.28%	
	Remaining Personnel	4,354	20.84%	
	<b>TOTAL</b>	<b>20,889</b>	<b>100%</b>	
2014	Upper level executives	1327	7.16%	17.5
	Mid-level executives	1684.5	9.08%	
	Technical Personnel	3314	17.87%	
	Sales & Customer Service	9182	49.52%	
	Remaining Personnel	3034.5	16.37%	
	<b>TOTAL</b>	<b>18,542</b>	<b>100%</b>	

### “We all participate in Development. We Become Better!”

The **“Leadership Campus”** is a challenging educational program tailored to the characteristics and requirements of the wider group of our executives. It is based on the latest development methods through multi-theme and interactive workshops, meetings, coaching and participation in information workshops. For the 4th consecutive year, we conducted **396 hours of training** with the participation of 12 executives, whereas the total hours from the start of the program were 6,079 and the total participation of 230 executives.

**“Pathfinder”**: In the context of constant skills development we designed and successfully implemented for the first year the “Pathfinder” program. This is a personal development training program aiming to help the people of WIND discover paths to self-improvement and growth in a way that will have a positive impact and contribute to the success of WIND. In 2016, 92 employees attended 3 full-day interactive training sessions.

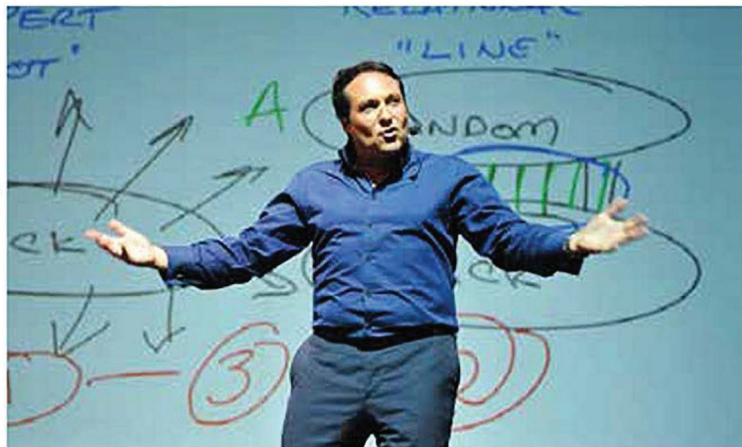
**“ThankAthlon”**: The results of the latest Employee Opinion Survey showed the need to reinforce recognition as an element of our corporate culture. Thus, in 2016 we organized the development program “ThankAthlon”, aiming at strengthening line managers in giving moral recognition to members of their teams. With participation reaching **94.1%**, in 2016 we had 8 different groups of line managers of WIND Hellas attend the 4-hour workshop.

**"ReThink!":** In 2016 we designed and implemented the training program "ReThink!" that involved supporting the greater group of company employees with tools that maximize and utilize creativity, special talents and the experience and expertise of all WIND people.

Specifically, 110 employees attended the speech of the world renowned Innovation Guru Stephen Shapiro with the subject "Creating High Potential Innovation Teams", which was held on July 7th at the Foundation of the Hellenic World. International Innovation Practices were discussed and new innovative ideas, adapted to the Greek reality, were shared. Next, the employees participated in a one-day training session in July, as well as an action learning meeting in September so as to become more effective to:

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

#### "Being Developed - Mentoring Youth" program



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

**"Future Leaders":** We are continuing our collaboration with the Future Leaders organization, whose goal is to support NGOs with the contribution of experienced executives in the development of business plans and their practices. To date 12 executives of our company have participated in the program.

**"Job Pairs":** We were the first company to support the "Job Pairs" program; a voluntary initiative that connects executives and professionals with university alumni that want to start their career in the respective field / profession. To date, 20 executives of WIND have participated in the program as mentors.

**"Virtual Company":** In 2016, we participated for the first time in the association Junior



Achievement Greece. The goal of the program is to introduce children to the basic concepts of entrepreneurship, in a simplified manner and through the hands-on learning procedure. This way students have the opportunity through appropriate guidance to work in teams and develop virtual business models. Two volunteers from the company participated in the program.

#### Internal Training Programs

Once more we, the people of WIND, took the initiative and organized various internal training sessions, diffusing knowledge to our colleagues. These training sessions included, among other subjects, the seminars "WIND is U", Business Continuity Management System, Systems & Tariffs, Account Manager's Manual, Code of Conduct & Risk Management, Forms of Harassment and Customer Experience. Thus, this year, 5,746 hours of training were implemented.

#### Interactive Platform E-Learning

This year we introduced a comprehensive program of the Harvard Business School, based on the principles of E-Learning. Courses can be taken from work or home and there is flexibility in terms of hours and days of attendance.

The program includes 6 interactive courses:

- Customer Focus
- Project Management
- Innovation & Creativity
- Time Management
- Finance Essentials
- Presentation Skills

A total of **257 colleagues participated in this program.**

#### Scholarships

A program to finance bachelor's and masters studies aiming at earning valid qualifications for those employees who have high career growth potential in the Company.

Since 2002, the Human Resources Department has

granted a total of **45 scholarships** to public and private academic institutions, of which 33 are for postgraduate degrees and 12 for undergraduate degrees.

### Corporate Induction Programs

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

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## Talent Management & Succession Planning

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

### Internal Candidate Recruitment

When there is a need to fill an open post, we first look among our own people as the best source of qualified candidates. Thus, our employees are encouraged to explore opportunities for growth in other positions / departments. Our purpose is to offer employees the opportunity to acquire knowledge, personal growth and professional development. Within the year, **13% of our employees** took an important step to personal advancement and were promoted or moved into new roles.



In October 2015 our Company first launched the "WIND Young Talents Graduate Trainee Program", a new program that added 10 University graduates with a Postgraduate degree, talent and will to the WIND family. These individuals who stood out through the selection procedure and **were hired under a permanent employment contract** at the beginning of 2016, after completing two months at the Company, exploring in the most interactive way the basic points of contact of WIND with its customers, the Call Centers and the WIND Stores,

were incorporated in their original work teams. Through the **procedure of rotations**, which is the basic feature of the program, they were incorporated and supported more than 17 different work teams, became familiar with many subjects and quickly acquired a complete picture of the organization. 2016 "finished" for those with knowledge, new experiences and their incorporation into their final work team. In 2017 these individuals will welcome new Graduate Trainees of the 2nd cycle, since they will become their work buddies who will guide them in their first steps within the Company.

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## Two-way Communication

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

The methods and communication channels of open and constructive dialogue we used included, among others, surveys, workshops, meetings with the management team, open communication meetings, HR Friday meetings, WIND News, and the internal Intranet portal, soon to be upgraded.

### Me@WIND

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

### Employee Opinion Surveys

Participation in the survey increases each year and for the last survey in 2016 it reached **85%** of all employees. The high percentage of participation in the survey gives a reliable picture of the organization, its growth and the issues that concern us. Annual action plans at a level of teams and the company are designed based on the survey results. Our goal is our continuous progress so that WIND Hellas is a leading work environment.

## Awareness Sessions

These are ad hoc information sessions held each time the need arises to inform our employees on issues concerning new policies, procedures, methods and work tools, as well as on significant developments concerning our Company. To date we have held **8 sessions concerning different subjects**, on the development of our 4G Network and the team Customer Experience, forms of harassment at the workplace as well as the group Life Insurance & Medical Coverage plan. In particular at the sessions concerning the latter, 110 colleagues participated from Attica and Thessaloniki, who were informed on the effective use of the plan as well as the new online services “e-services / e-claims”.

### WIND Forward: Meetings with the CEO

In 2016, after the successful completion of the Company’s reorganization at all levels, we organized **meetings of the CEO** of the Company **with all colleagues**, without the presence of their supervisors. At the meetings, the market conditions and prospects were discussed, the achievements of WIND Hellas, the Company’s plans and strategies for the future, which through the direct contact of all colleagues with the CEO created a special experience that **strengthened the feeling of pride** and self-confidence of us all for the future.

### Focus on the Customer

For the 4th consecutive year we implemented the program **We Listen to the Customer**. In total, after 9 cycles, participation has reached **400 colleagues from the commercial departments, customer service and support, the IT teams, credit control, network department and the accounting and internal audit department**. The goal is still for all of us to participate listening to our customers with our presence at the stores and to **propose ideas** to improve their experience.

### Development of Communication Skills

Aiming at the effective communication of our executives both at formal as well as informal meetings, on an individual or group basis, we focus on **developing the communication skills of our executives**. The Manager Coaching Culture program implemented since 2013 for all line managers includes training and guidance among others and for the provision of clear and constructive feedback; a skill that is proven to be especially useful in all forms of communication.

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## Volunteerism - Social Contribution

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

### Employee Blood Bank – Voluntary Blood Donation Program

This is one of our most important initiatives that was started in 2002 and since then is implemented twice a year. Since 2002 and to date, the Blood Bank counts 1086 voluntary blood donations. In 2016 the Blood Bank covered the needs of 40 people (employees and their families) with 57 units of blood.



### New program of activities and well-being

In 2016 we designed and implemented a program of activities and well-being for all WIND employees. The program was formed with the **voluntary participation of all our employees**, who were invited to answer a short questionnaire on their interests. In total, 400 employees submitted **over 2,000 proposals** for well-being activities, of which **115 employees volunteered** to undertake the role of trainer or coordinator. The result of this effort was the establishment of yoga and self-defense lessons, football and basketball games, the formation of a company music group as well as the organization of anti-smoking sessions, thus covering a wide range of activities and interests.

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## Employee Events

Each year we invite our employees and their families to enjoy happy moments in Athens and Thessaloniki by organizing various events throughout the year.

### Parents Day & Christmas Party for children

Every year, just before schools start, we celebrate Parents Day and welcome the children of all our employees to our facilities, to see where their parents work and to play! This year, we added even more great activities, such as bungee trampoline, climbing and biking paths to attract teenagers as well.

As Christmas approaches, at our facilities at Thessaloniki, young and old were invited to watch theater performances, to play, to participate in activities and to receive Christmas gifts.

### **Xmas Party**

The Christmas Party for employees launches the holiday spirit! With the participation of all employees from across Greece, associates and customers of the company and with great music, food and beverages this night remains unforgettable for us all!

### **Light Up Event - 23 years of non-stop evolving!**

In 2016 we celebrated for the first time **our company's "birthday" - 23 years since the first call was made by a mobile in Greece, and naturally from the network of WIND!** Making puzzles, listening to colleagues who have been with the company since its 1st day of operation, enjoying refreshing ice cream, responding to quizzes and participating in draws, we remembered the reasons why we should feel proud.





# ENVIRONMENT

We minimize our environmental footprint

It is our systematic pursuit to have the smallest possible impact from our activity on the environment, with the emphasis on preventing pollution, reducing energy consumption, environmental compliance and promoting information on the protection of the environment.

## AT A GLANCE

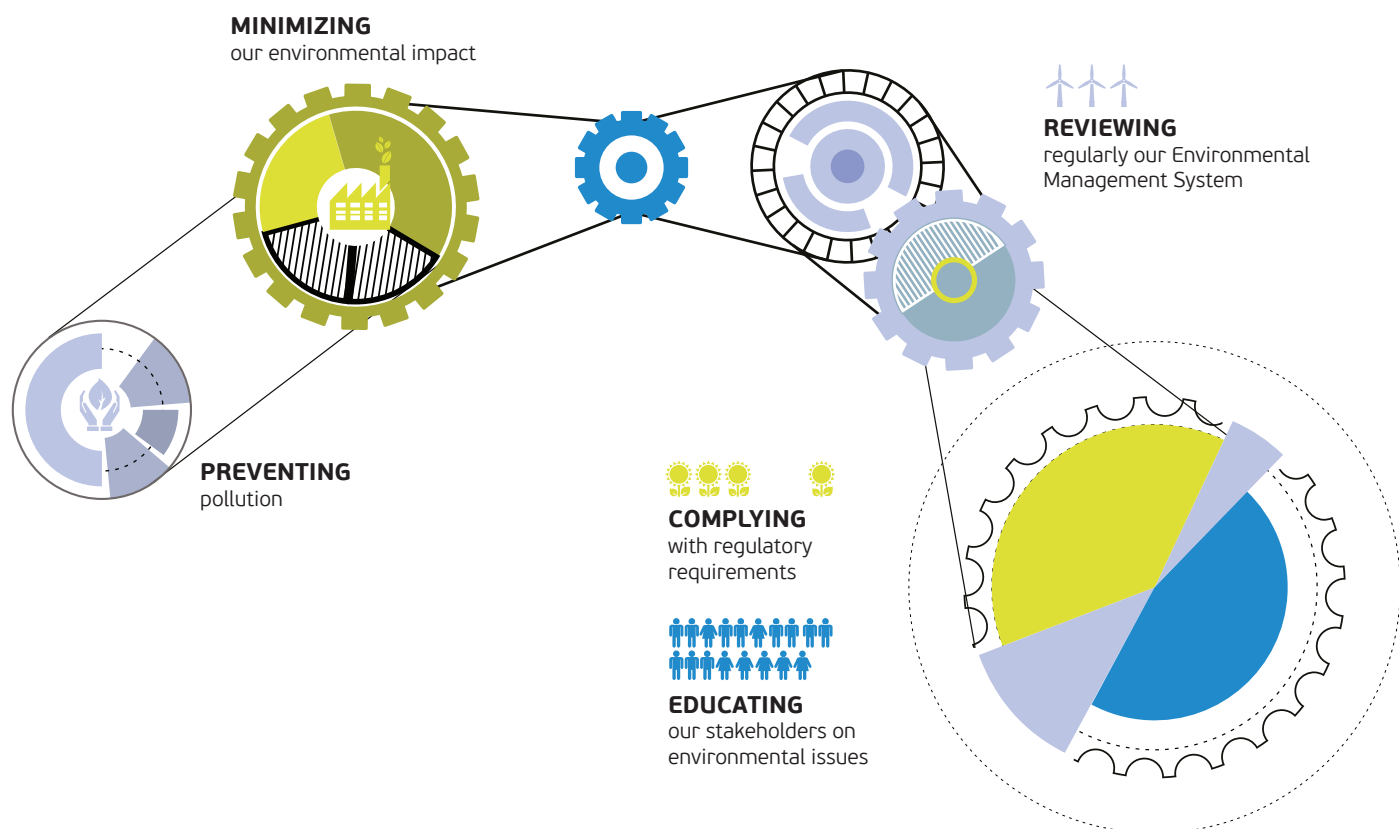
780,000 KWH LESS ENERGY CONSUMPTION FROM PROJECTS ON BUILDINGS AND EQUIPMENT | 70% GRADUAL ENERGY REDUCTION FROM FUEL USE IN THE LAST 5 YEARS | 36 TONNES OF PAPER WERE SAVED IN ONE YEAR FROM THE USE OF THE E-BILL

## Our approach

Being aware of our responsibility to the environment, we develop our activity in the telecommunications industry by caring for the protection of the natural environment and promoting sustainability, beyond what is required under the law. Furthermore, we aspire with appropriate interventions to be a good example and to reinforce the environmental consciousness of our customers.

## Environmental Management

The operation of WIND inevitably impacts the environment. For the best management of the impacts from our operation, since 2008 we have applied the ISO 14001-certified Environmental Management System.





The significant impacts from our operation are identified, evaluated and prioritized, setting relevant goals to respond to the more critical ones. The end goal is to constantly improve, reduce the impact or where feasible, to completely eliminate it. The evaluation of impacts is reviewed on a regular basis so as to ensure we are up to date and adapted to new circumstances, internal and external, domestic and international<sup>1</sup>. The significant impacts from our operations are presented below.

Significant environmental impacts from our operations and actions of WIND

Table 7.1

Issue	Environmental Impact	Action	Objective 2016	Result 2016
Energy Consumption	Depletion of natural resources, atmospheric pollution, contribution to climate change and atmospheric acidification.	Energy savings projects (equipment renewal, building interventions).	Separate energy savings projects and increase in energy efficiency.	Reduction in energy consumption from projects in buildings and equipment by ~ 780,000 kWh. Reduced PUE in renovated Data Centre by 12.3%. Reduction in energy intensity by 5.75%.
Waste production	Depletion of natural resources, creation of pollution, landfill saturation.	Actions with the three-fold focus "Reduce-Recycle-Reuse".	Increase of registered subscribers to the electronic services My Wind / E-Bill. Replacement of printers.	Increase in paper savings due to the use of the E-Bill application by 15%, increase of registered subscribers by 22%. Complete replacement of printers.
Electromagnetic emissions	Atmospheric pollution.	Environmental Impact Assessments, EM Energy Emissions Assessments, compliance with limits and standards set by Greek and EU legislation as well as international standards.	No violation of the limit by a base station. <sup>2</sup>	There were no violations of limits (except antennae parks) in 2,331 measurements of the EEAE.

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In 2016, expenses recorded as environmental protection such as the maintenance of the ISO 14001-certified Environmental Management System and compliance with obligations under Law 2939/2001 on alternative waste management amounted to approximately 10,580€. Regarding fines and penalties for non-compliance with environmental legislation, there were no relevant significant financial or non-financial penalties in 2016.

<sup>1</sup> e.g. the Paris Agreement to keep global warming under the limit of 2°C and the UN Sustainable Development Agenda, which set 17 Sustainable Development Goals by year 2030.

<sup>2</sup> Excludes antennae parks that also host base stations for radio transmission, TV, digital TV, TETRA base stations, radar etc., and any violation concerns cumulatively all transmission facilities.

# Climate, Energy and Energy Management

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

We constantly examine ways to reduce energy consumption and to increase energy efficiency with interventions to buildings and projects at a level of equipment as well as buildings, as imposed by the major efforts on national, European and international level<sup>3</sup>. At the same time we monitor the air pollution emissions direct and indirect (translated to equivalent carbon dioxide).

## Total energy consumption

The majority of the energy we consume is electricity, but we also use diesel, fuel oil, and gasoline for vehicles. The total energy consumption recorded in 2016 amounted to 289,307 GJ, including fuel for the vehicle fleet.<sup>4</sup> The electricity we consumed reached 253,942 GJ reduced by 4,232 GJ compared to 2015 or approximately 2%.

The efficiency of the energy used (energy intensity), expressed as units of consumed energy to total annual revenue in 2016 was 0.598 GJ/km € reduced by 5.75%.

The energy we consume comes from non-renewable sources. However, we have installed and operate a limited number of RES (10 PV of 900 W power) in hybrid electric generating sets. In 2016 we estimate that these systems produced about an average of 1700 kWh of energy each.

FIGURE 7.1  
ENERGY CONSUMPTION DISTRIBUTION 2016 (GJ)

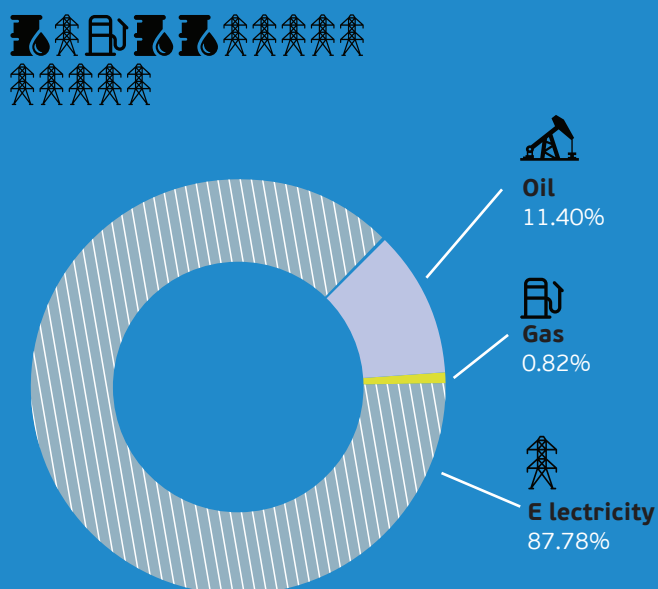
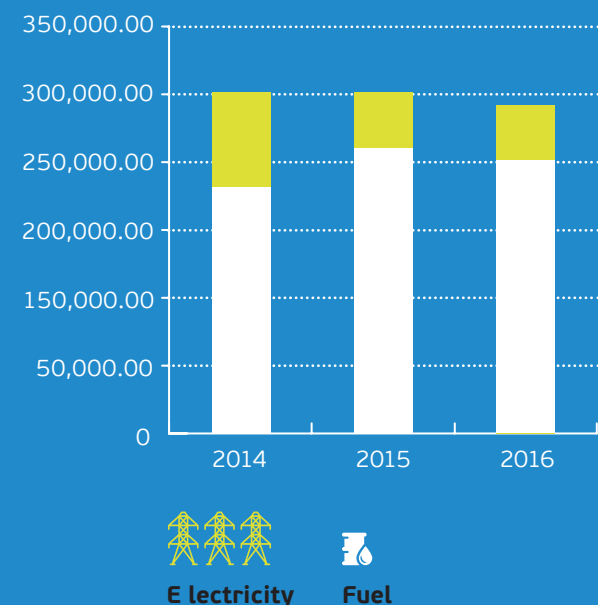


FIGURE 7.2  
ENERGY CONSUMPTION DISTRIBUTION 2014-2016 (GJ)



<sup>3</sup> e.g. goals 20-20-20 of the EU, and more recently 27-27-40 by 2030, as well as Goals 7 and 13 of the UN Sustainable Development Goals.

<sup>4</sup> Does not include our chain of stores.

In 2016 we focused on individual projects for energy savings concerning operations and equipment as follows:

**The energy upgrade of the Data Centre with complete replacement of the air conditioning.**

**Result:** Reduced PUE by 12.32% compared to the initial state and by 7.5% compared to a usual data centre of equivalent category<sup>5</sup>

**The continued replacement of old air conditioning units with new or newer units**

**The spacial and operational reorganization / redistribution of telecommunications equipment and IT aiming at using less space for the same equipment and increase in efficiency of the backup equipment (this project continues into 2017).**

**Expected Result:** Savings over 80 Kw in power from equipment

**The IT Database Virtualization, with the replacement of physical machinery with virtual systems and simultaneous savings in space and energy needs through the performance of system resources used in real time, when and as much as required.**

**Expected Result:** Energy savings for these systems can reach up to 70% according to manufacturer's specifications, whereas it frees up to 90% of the physical space used.

In addition, we use a system to monitor the energy used at one of our buildings that uses the most energy and is also highly populated, to better control energy consumption, and we have already taken many other actions to increase the building's energy efficiency, such as replacing lighting with LED lights, a project that resulted in energy savings of 392 GJ.

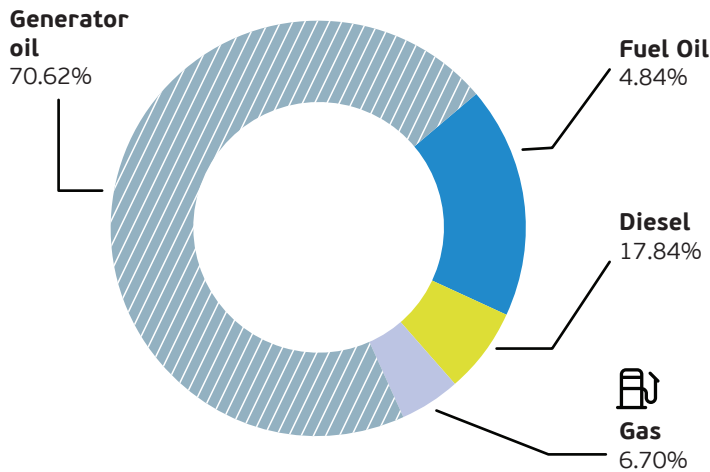


<sup>5</sup> Category "localized" according to the related report by Berkeley Lab entitled "US Data Centre Energy Usage Report 2016, pg.

## Fuel Consumption

All fuel we use comes from non-renewable sources.

FIGURE 7.3  
ENERGY CONSUMPTION - USE OF FOSSIL FUELS (%) 2016



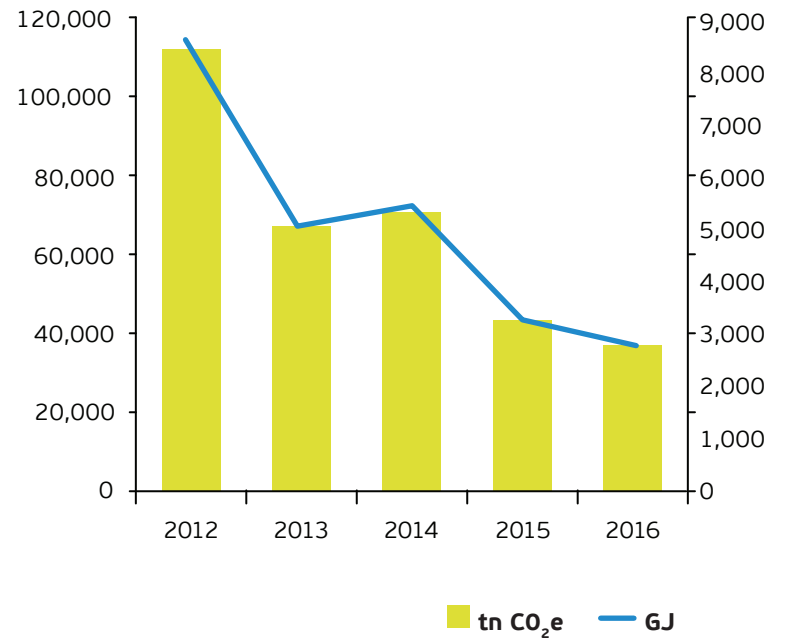
A significant part of the energy used from fossil fuels is intended for electricity production or backup in case of the interruption of electricity at installations / points of presence of the network.

To reduce the fuel used for electricity production at remote base stations we designed and completed a project involving the replacement of generators with hybrid systems, marking significant savings in consumption.

Even after the implementation of the above project, of all fossil fuels consumed in 2016, 70% of that concerns the use of generators for electricity production. The rest was consumed for heating of buildings and the vehicle fleet.

As a result of the actions to increase the efficiency and savings in fuel from the use of hybrid systems for electricity production at Base Stations, the replacement of the vehicle fleet with new with clearly improved consumption per 100km, etc., we saw a gradual reduction in energy from the use of fuel in the last 5 years with the reduction at almost 70%.

FIGURE 7.4  
TOTAL ENERGY CONSUMPTION FROM FUEL (GJ) AND EMISSIONS 2012-2016 (CO<sub>2</sub>e)



## Vehicle Fleet

With respect to the corporate vehicle fleet, these consumed total 243,692 litres of fuel, of which approximately 28% was unleaded gasoline and the remaining was diesel.

The consumption per vehicle (annually) was 1,369 litres, slightly higher compared to 2015 (1,286 litres). The consumption per kilometer for all vehicles was 0.067 litres. The total emissions from the fleet for 2016 was 629.59 tonnes CO<sub>2</sub>e<sup>6</sup>.

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

## Pollutants emissions

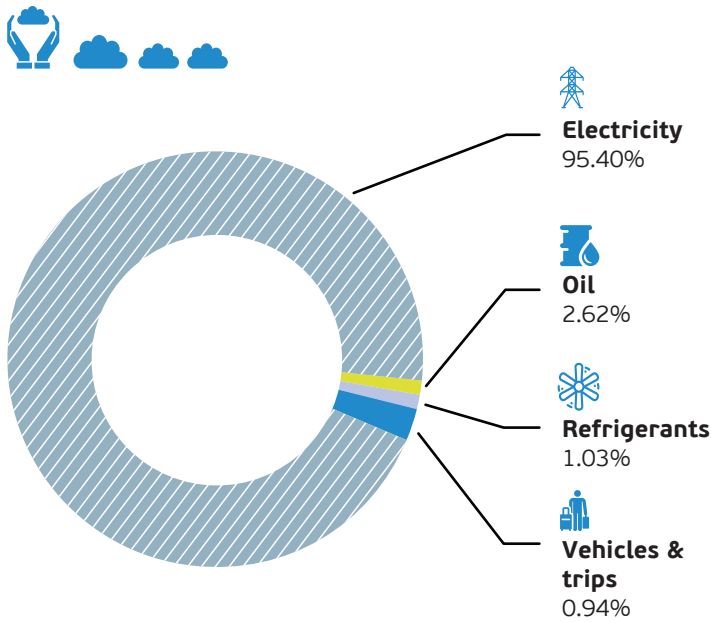
Pollutants emissions amounted to 77,634 tonnes of equivalent carbon dioxide, marking a reduction by 1.64% compared to 2015 by 1,291 tn CO<sub>2</sub>e.

To calculate the emissions we used the guideline of the World Resources Institute<sup>7</sup>.

<sup>6</sup> 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".

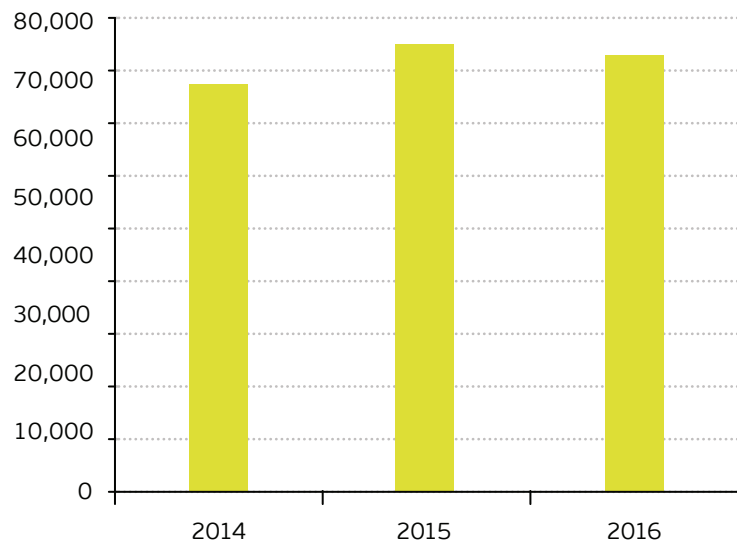
<sup>7</sup> World Resources Institute 2008: GHG Protocol Tool for Stationary Combustion Version 4.1 (2015) and the respective GHG emissions from transport or mobile sources Version 2.6 (2015).

FIGURE 7.5  
DISTRIBUTION OF POLLUTANTS EMISSIONS BY SOURCE (%) 2016



Does not include emissions from consumption of electricity for which we use a lower conversion index of the companies that supply our electricity<sup>8</sup>.

FIGURE 7.6  
POLLUTANTS EMISSIONS (tnCO<sub>2</sub>e) 2014-2016 / ELECTRICITY

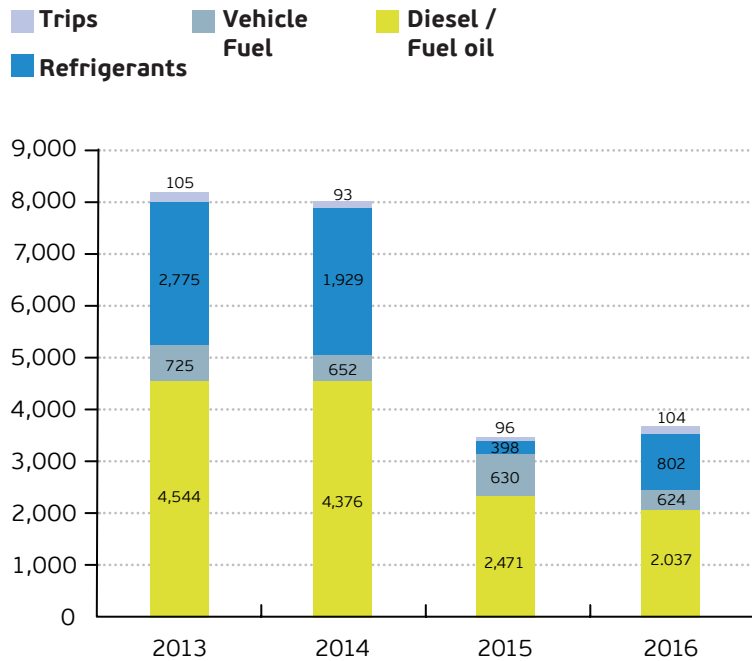


<sup>8</sup> In 2016 we changed the conversion index for the electricity that we are supplied from PPC SA, due to the publication of a newer conversion index (1.05 kg/kWh/ [https://www.dei.gr/Documents2/%CE%95%CE%9A%CE%95/APOLOGISMOS%20DEH\\_2016\\_WEB\\_FINAL%20GR.pdf](https://www.dei.gr/Documents2/%CE%95%CE%9A%CE%95/APOLOGISMOS%20DEH_2016_WEB_FINAL%20GR.pdf) pg. 70). To better compare the annual performance data, in Figure 6 we have recalculated all indirect emissions from the supply of electricity with this index.

<sup>9</sup> GWP IPCC 100y [http://www.ipcc.ch/publications\\_and\\_data/ar4/wg1/en/ch2s2-10-2.html](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>

<sup>10</sup> sum HFC and HCFC

FIGURE 7.7 POLLUTANTS EMISSIONS (TNCO<sub>2</sub>E) 2014-2016 (NOT INCLUDING ELECTRICITY)



### Greenhouse gases that harm the ozone (ODS)

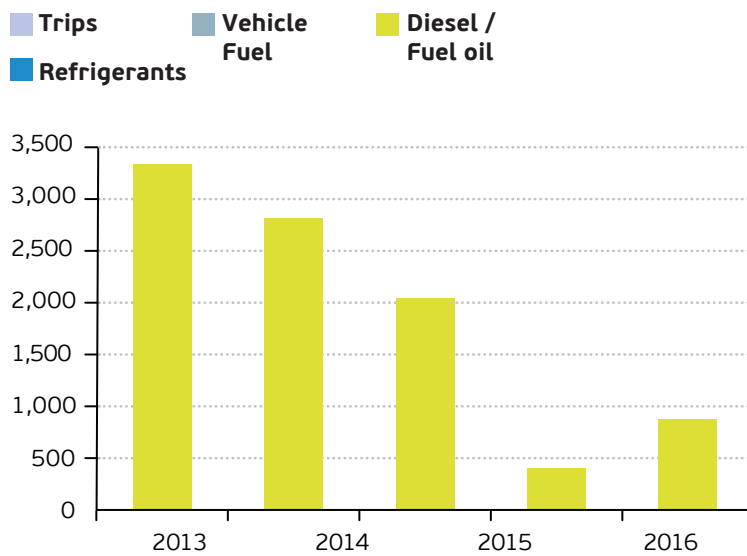
Greenhouse gases that harm the ozone result from the operation of air conditioning units. Considering that the quantity in the circuit of each machine can potentially leak into the environment, we estimate this quantity as air pollution. To calculate the pollution, we use data of the IPCC (Intergovernmental Panel for Climate Change)<sup>9</sup>.

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

In 2016 we estimated that 477 kilos of refrigerants could have leaked into the environment and the total pollution from these leaks equates to 802kg CO<sub>2</sub>e.

Due to breakdowns at a specific facility, in 2016 there was an increase in emissions (Figure 9), which doubled the R407c emissions and partially overturned the positive course we had achieved in the previous years, resulting from our actions to renew equipment and increase the frequency of monitoring and controls.

FIGURE 7.8  
EMISSIONS FROM REFRIGERANTS 2012-2016 (TN CO<sub>2</sub>E)<sup>10</sup>



## Electromagnetic Radiation

At WIND Hellas we have adopted a responsible approach with respect to monitoring and measuring the levels of electromagnetic radiation. During the installation, operation and control of our network operation, we comply with all international safety standards as well as the guidelines of the Greek legislation.

Specifically:

- We adhere to the strict exposure limits laid down by legislation as well as the international organizations.
- We cooperate with all local bodies when we build new base stations.
- We take into serious account the legislation for the installation of base stations at locations that may potentially expose vulnerable groups of the population, such as schools, hospitals, day care centers etc.
- We recommend to the greater public to be informed on this matter and only from the competent authorities, and the related information published by these authorities toward this purpose, such as:
  - Information leaflet on mobile telephony (<https://eeae.gr/files/ενημέρωση/κινητήτηλεφωνία.pdf>)
  - Mobile Telephony and Health ([https://eeae.gr/docs/president/\\_KINHTAfinal.pdf](https://eeae.gr/docs/president/_KINHTAfinal.pdf))
  - Information from the World Health Organization (WHO) ([https://paratiritirioemf.eeae.gr/images/Documents/FS304\\_greek.pdf](https://paratiritirioemf.eeae.gr/images/Documents/FS304_greek.pdf))
  - Websites of the Hellenic Observatory on E/M Fields with available measurement results on interactive maps (<https://paratiritirioemf.eeae.gr/index.php?lang=el>)

The organization that is responsible for monitoring non-ionizing radiation is the Greek Atomic Energy Commission (EEAE). Within the scope of its responsibilities it accepts requests from all communications providers as well as television stations etc., and also conducts radiation measurements on samples of base stations throughout the country.

In 2016, the EEAE conducted **2,331 measurements** and did not find **any violation of limits from base stations** of mobile telephony operators, with the exception of the so called “antennae parks” that also host base stations for mobile telephony, TV, radio transmission, TETRA base stations, radar etc., and any violation concerns cumulatively all emissions from all the above.

## Waste Production and Management

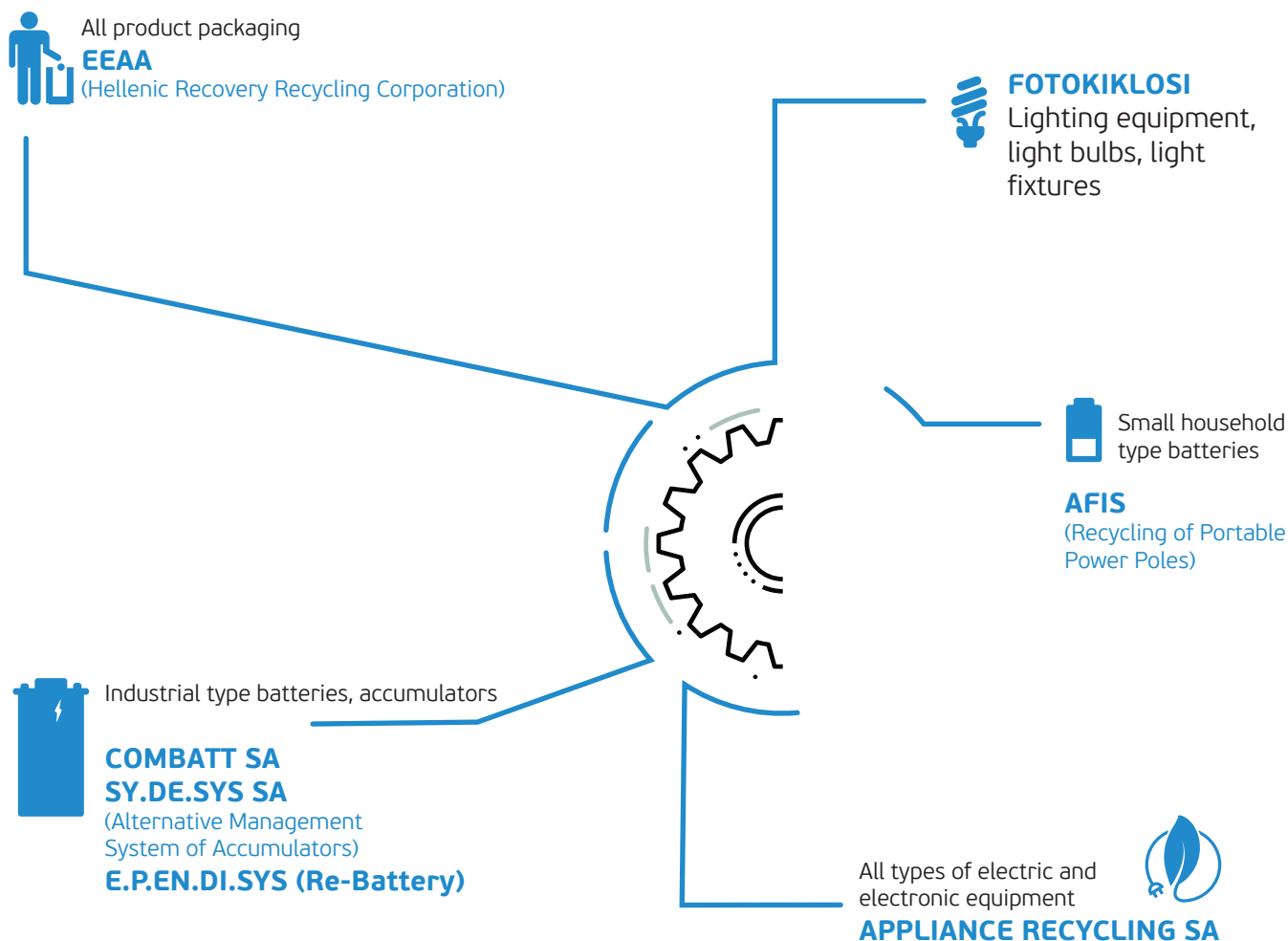
The waste produced from our operations is collected, separated and recycled or whenever this is not possible due to technical reasons, it is disposed to landfill sites provided it is not hazardous waste.

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

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

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

### Collective Waste Management Systems



The production of waste in 2016 was 966 tonnes, compared to 316 tonnes in 2015. This major increase is due mainly to the inclusion of quantities of construction waste from the projects concerning complete dismantling of base stations in the scope of operation of Victus. Based on the joint management of the network, locations that hosted base stations and from both companies can now be covered by only one facility. Further, due to the given periodic scheduling of maintenance works and / or the implementation of projects at antennae systems and other installations (e.g. liquidation of file, replacement of furnishings due to renovations, liquidation of stored equipment no longer required) we observe significant annual fluctuations in the produced quantities of waste.

### Hazardous / Non-Hazardous Waste

Waste production was greater in hazardous waste compared to non-hazardous waste, since the majority of produced waste is equipment (Waste Electrical & Electronic Equipment / WEEE), accumulators, batteries and lubricant waste, excluding construction waste. All hazardous waste is recycled with the help of qualified licensed partners.

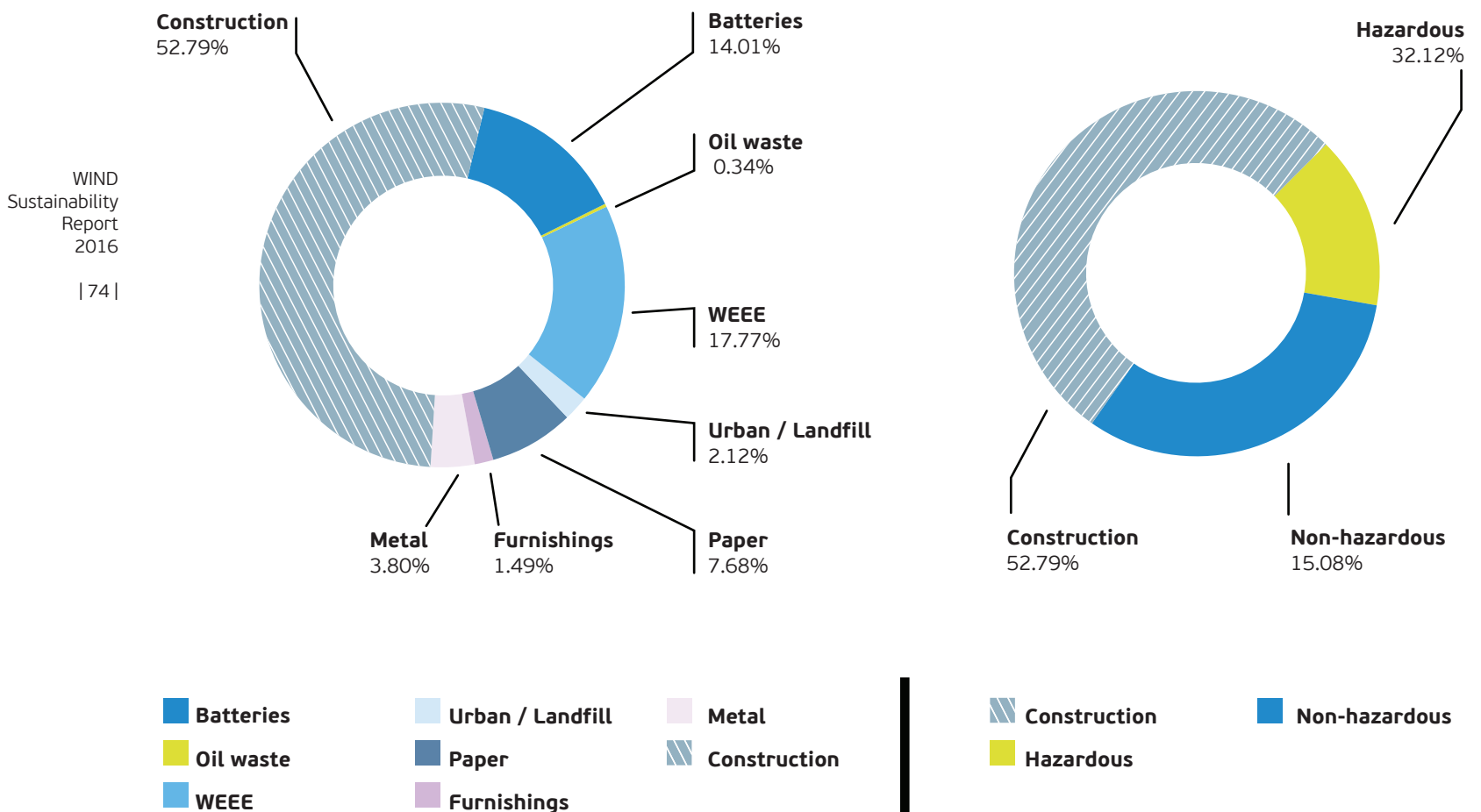
Approximately 145 tonnes of non-hazardous waste, excluding construction waste, were produced in 2016, consisting of recyclable non-hazardous materials (mainly paper and metal) and the mixed urban type waste resulting from our operation and then disposed of to landfill sites. In total, 20.38 tonnes were disposed of to landfill sites in 2016, a percentage that equates to approximately 4.37%<sup>11</sup> of the total production in 2016, with a significant increase of landfill disposal in 2016 due to projects concerning liquidation of old objects that cannot be recycled for technical reasons.

We managed all waste produced within Greece.

FIGURE 7.9 / 7.10  
WASTE PRODUCTION DISTRIBUTION 2016

WASTE DISTRIBUTION PERCENTAGE BY PRODUCT 2016

PERCENTAGE DISTRIBUTION BY HAZARD



<sup>11</sup> Not including construction waste. Including construction waste, the percentage is 2.12%



## Reduction in paper use

Actions aimed at reducing the use of paper have been implemented systematically for more than ten years. These actions concern our internal procedures as well as the greater public and our customers. Since 2001 we have been eliminating the use of paper where possible, and have already implemented many actions such as:

### Internal environment

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

### Stores partners suppliers

- elimination of printing for certain documents where communication with the stores was made in printed format
- electronic management of invoices,
- changing the printers in the stores to models that print on a smaller surface for specific documents,
- use of digital signature.

### Subscribers

- e-bill / e-services to subscribers, for managing their bill without paper as well as other services from any device and their mobile phone, through the special application myWINDAPP.
- new digital stores that offer a unique experience of technology and service to consumers and better environmental profile, fully incorporating all capabilities of digital technology and eliminating the use of paper and printed documents related to promotion and advertising to a large degree.

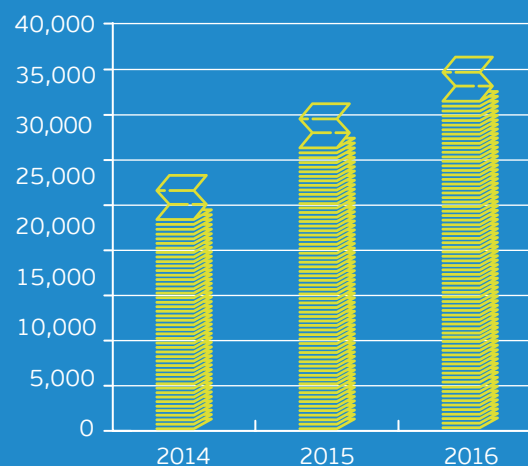


## The results are significant!

By using double-sided printing we achieved reduction in the use of paper which in the first year of implementation amounted to 600,000 sheets or the equivalent of 1,500 kilos of paper annually. By using the company website and electronic management of the 7 most used forms we save approximately 60,000-70,000 sheets of paper annually and the equivalent of approximately 300 kilos of paper. By changing various procedures concerning either the chain or the offices we save tens of thousands of sheets annually, weighing over 10 tonnes (9.5 tonnes result from the change in only one procedure). From the use of the e-bill in 2016 we saved approximately 36 tonnes of paper in one year. The quantity of paper saved compared to 2015 marked an increase of 15%.

The emphasis we place on the use of the application myWINDAPP by our subscribers achieved significantly more savings in paper used, marking an increase of 22% for registered subscribers.

FIGURE 7.11  
PAPER SAVINGS PER YEAR (KG) FROM THE USE OF THE E-BILL



Our new digital store gives us a significant opportunity to reduce the 500 tonnes of paper used in advertising material of all types (brochures, posters etc). We calculated that compared to the previous state the use of monitors for advertising marketing information saves approximately 150 tonnes of paper in one year by not printing the brochures or the corresponding 2,500 trees! Savings reached 75%. The results of our internal actions for saving paper are illustrated in the paper consumption index per employee, which in 2016 was 4.25 packs per employee; i.e. less than half compared to 2008 when we started calculating this index. In 2008 this index was 8.8. packs per employee.



# MARKET

We offer premium customer experience

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

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

## AT A GLANCE

66.4% 4G POPULATION  
COVERAGE | 8.5%  
WE INCREASED OUR BASE  
IN FIXED TELEPHONY  
| 30% INCREASE OF  
SMARTPHONE USERS | 16  
NEW FIXED TELEPHONY  
TELECOMMUNICATIONS HUBS

## Our approach

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

Our new digital stores, our Call Center, broader business partnerships and online platforms are playing a key part in improving customer experience.

Moreover, we have further simplified our programs and services, providing more user friendly but “responsible” products, affordable to our subscribers, focusing on their needs as well as the explosive growth of mobile data use.

## The Focus on Customer Experience... and 2016

We redesigned our products and services, renewed our chain of stores, upgraded our telecommunications network, while ensuring quality level of service with all means possible and creating relationships of trust with our suppliers.

## In an even more demanding year we had systematic progress

in mobile telephony:	<ul style="list-style-type: none"> <li>• we introduced the new generation of the W &amp; W plus contracts, freeing the mobile internet use in combination with the development of our 4G network.</li> <li>• we achieved 55% annual increase in the W and Wplus contracts, which are our greatest value products.</li> <li>• we maintained our share of active customers increasing by 5% the talk time they use.</li> <li>• we increased by 30% the smartphone users who use the data services at our base, while doubling the average data use by smartphone users.</li> <li>• we developed our 4G network and tripled the 4G coverage in a year and a half.</li> </ul>
in fixed telephony and Internet:	<ul style="list-style-type: none"> <li>• we introduced to the Greek market the fast internet at home or the office without a landline. Our SIMPLEfi flexible services were designed to cover the need for easy and fast Internet to those who travel, move frequently or occasionally use the Internet.</li> <li>• we focused on strengthening the bundle products for Fixed - Mobile and Internet with triple play solutions, more than doubling the number of those subscribers.</li> <li>• we increased our base by 8.5%.</li> <li>• we expanded 16 telecommunication hubs, currently amounting to 312 in total, providing fixed telephony and Internet services to 74.8% of installed telephone lines.</li> <li>• we expanded the VDSL coverage and increased the number of our subscribers who use WIND VDSL by 57%.</li> <li>• we introduced a new online customer service for Fixed &amp; Internet, with various subjects and information videos, based on the most important needs and requirements of our customers.</li> </ul>

### New Digital Stores

Drawing on its stores and wider commercial partnerships, it will spearhead the retail market, while developing new online sales platforms, offering its customers the best possible experience.

#### WIND SALES CLUB. A closely tied team

It is a social networking site, addressed solely to the sales teams of the WIND stores. It is based on a social media platform, showcasing two-way communication, information, as well as feedback through active participation, both in the sales contests as well as the remaining functions of the site. It utilizes in the best possible way the advantages of social media and the pillars on which its operation and management consist of:

- the creation of a closely tied community, a strong sales team of the WIND stores across Greece
- feedback through interactive communication with the sales reps, so as to identify more areas to be improved, especially with respect to the WIND subscribers
- the creation of sales contests, providing to the sales teams of the retail stores even more incentives
- reinforcing the initiatives and sponsorships of WIND, making the sales teams of our retail stores the ambassadors of WIND.

### In 2016...

- 750 members / sales reps, a number that exceeds 95% of the sales teams of the retail stores
- more than 100,000 visits to the page by sales reps each month
- more than 200 new proposals and ideas in the context of the action "See things simply", whereby the people of the WIND stores are invited to propose improvements for simplifying the Company procedures. The specific number of proposals and ideas concerns the 5 months of the action.

#### WIND Stores Blood Bank

To address the challenges of life, we created the **WIND Stores Blood Bank** for our employees at the Stores.

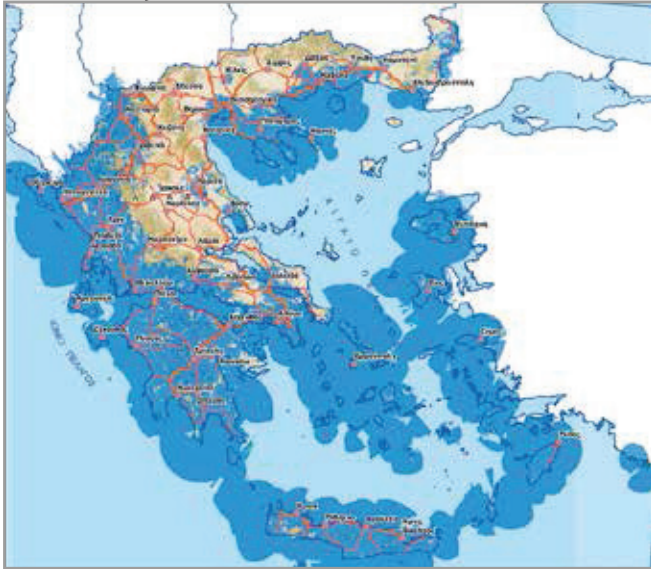
To date we work with the hospitals **Athens General Hospital "G. Gennimatas"**, the **Thessaloniki General Hospital "Ippokratio"**, the University Hospital of Rio "Panagia Voithia", the **University Hospital of Ioannina and the University Hospital of Larissa, and will soon be adding more hospitals.**

## Network Development with Responsibility

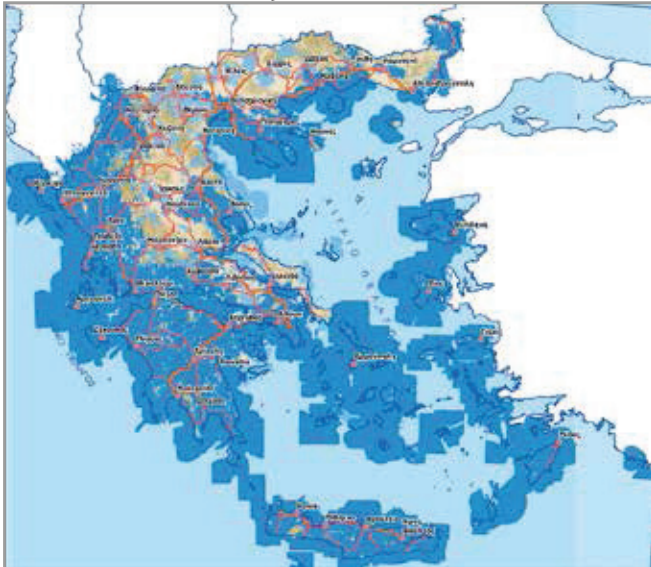
Since our establishment we have invested systematically in infrastructure and the development of our network with responsibility and sensitivity for public health and the environment. The goal of our strategy, with our investments in the new network and our trade promotions, is to bring mobile broadband closer to the Greek users.

Field of Interest	Status	2016
The mobile telephony network	In 2016, the population coverage of the network reached	<ul style="list-style-type: none"> <li>• 2G: 99.63%</li> <li>• 3G: 79.03%</li> <li>• 4G: 66.4%</li> </ul>
	Concerns the development of a completely new radio network that allows nominal mobile broadband speeds up to	<ul style="list-style-type: none"> <li>• 42 Mbps for 3G</li> <li>• 300 Mbps for 4G</li> </ul>
	At the present project phase we have completed the modernization of the stations that cover	Athens, Thessaloniki, the greater area of Corinth, areas of Viotia and Evia, areas of the Cyclades, the Dodecanese and Ionian Islands, areas of the North Aegean and Evros, areas of Thesprotia and Corfu, areas of Magnisia and Larissa, all of Chalkidiki, areas of Xanthi, areas of Crete, and areas of the Peloponnese.
The fixed telephony network	The coverage for fixed telephony services and broadband Internet of the installed telephone lines in Greece is at about	74.8%
	Expansion of telecommunications hubs	16
	Upgraded the connection circuits through backhauling at about	167 sites
	International Capacity	166 Gbps
	GR-IX	20 Gbps
	Collocations in Telecommunication Hubs	312
	Underwater Fiber Optic Cables between	Greece - Italy Crete - Peloponnese Peloponnese - Central Greece
The VDSL coverage reached the urban centers	198	
E/M Radiation & Measurements	Measurements either in the context of licensing of base stations or at the request of citizens	7

4G Coverage (Dec. 2016)



3G & HSDPA Coverage (Dec. 2016)



2G Coverage (Dec. 2016)



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## Promoting Sustainable Development

### Internet of Things

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

### CLOUD Services

#### [WIND Business Marketplace](#)

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

### WIND Fleet Management

We have developed the innovative WIND Fleet Management service, offering the ability to companies, professionals, public organizations, private companies and institutes that manage vehicle fleets and means of transportation to reduce their operating costs, to better allocate their resources and to increase their safety and productivity by improving their operations and procedures. In this context, they achieve significant reduction in the carbon footprint of their business. In 2016 we increased our customer base by 46.8%.

### Wind Freeze Alert

We contribute as best as we can to the smooth operation of health interest stores by offering the

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

### Products without equipment

Most Internet users in Greece use various ways to have the related equipment (modem / router). WIND Hellas was the first company to stop sending the equipment with each new connection and made it optional, with the logic that the environment does not need to be burdened with devices that the user does not need and that require special handling for recycling.

### With respect for the environment

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

## Responsible Services

### Mobile telephony

#### - Balance Update Service for the W and WPlus Plans.

For the W and WPlus plans, subscribers are able to receive information on the balance of their talk time, the SMS and MB of their plan or their additional bundle, as well as on the Account Limit they have initially defined, by calling the number 1270 from their mobile phone.

#### - Free Automatic Update Service for W and WPlus Plans.

In addition, for W and WPlus plans, subscribers always know what is happening on their account. They are updated automatically and free of charge with SMS, 10 minutes, 10 SMS or 10 MB before, as well as after the free usage of their plan is exhausted.

### Protection of minors

With respect to the multimedia information services we strictly adhere to the regulations on the protection of minors while using their mobile phone. Regarding the 901

and 909 lines we have, as well as the five-digit SMS, the owner of the account (adult) can request with a phone call or written communication to be blocked.

### Customer Service

Table 8.1

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

Learn more at [www.wind.gr](http://www.wind.gr)

### User Information

#### - Safety for all

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

#### - Transparent Invoicing

We ensure that at all points of customer information the information concerning costs is provided with



transparency, in detail and clearly, through the availability of current price lists, press information or personal communication. With respect to the multimedia information services and calls with additional charge, we provide detailed information to our subscribers on these charges, fully complying with the regulations of the EETT and announcements to the provider of each service on the charge of the call, through a free recorded message. The charges for all multimedia information services can be found at the Company website ([www.wind.gr](http://www.wind.gr)).

## Responsible Marketing

The programs we provide are in accordance with the regulations and optional codes on communication and marketing, aiming at the customer's complete information on the benefits of our products and services. Thus, we ensure that our communications and promotional material is consistent with the provisions of the Hellenic Code of Advertising - Communications (EKD-E), the provisions on unfair competition and consumer protection and the overall existing Greek legislation. We monitor and strictly adhere to the regulations / guidelines of the Hellenic Communications Control Council (S.E.E.). In 2016 no fine or penalty was imposed to WIND Hellas for non-compliance on matters of competition.

### Communication Principles

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

#### Responsibility

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

#### Directness

We continue to invest in a 360-degree communication strategy, maintaining multiple channels of marketing and distribution of our products, selecting direct and clear ways of promotion. Being customer-focused, we continue to support the part of online communication and provide integrated online experience to all users and devices (desktop, tablet & smartphone). We now offer the possibility of direct service, on-the-go access to information and easy purchase of products and services through the "myWIND", "myF2G" and myQ" apps.

#### Honesty

At WIND, we make substantial efforts so that our communication is consistent with the principles of fair competition, complying with the Code of Commercial and Social Communication. Our goal is to build relationships of trust with existing and potential customers. This is why we invest in advertisements that gain public acceptance, explicitly communicate all product information and are not contrary to the Hellenic Advertising Code. It is worth noting that, in 2016, WIND had by far the fewest control requests by the Communication Control Council, compared to its direct competitors in the category of Telecommunications.

### 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 are related to consumer protection matters, namely:

- Code of Conduct for Providing Electronic Communication Services to Consumers (EETT Decision No. 488/82/3072008), as in force.
- Code of Conduct for Providing Multimedia Information Services (EETT Decision No. 451/10/1102007), as in force.

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

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

## Intellectual Property Rights & Communication Privacy

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

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

## Customer Satisfaction

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

### Better service with Mystery Shopping

Always trying to improve our stores, in order to offer the best service to customers, we designed the Mystery Shopping program. The "mystery" shopper, while visiting the store can evaluate it based on specific parameters. Specifically the key pillars of service that are evaluated are the following: a) appearance of the store, b) appearance / staffing of personnel, c) service, d) evaluation based on the scenario in question (needs, recommendation, presentation) and e) end of the visit. Mystery Shopping is a valuable tool that gives us the opportunity to constantly monitor our key pillars of service in our stores so that

we take corrective actions. Our key goal with the Mystery Shopping program is to constantly improve so that customers of our stores enjoy the best possible service.

### Surveys - Our relationship with consumers

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

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

### - Tracker Surveys

In particular, independent research agencies of ESOMAR completed 7 wave surveys that aimed to monitor specific "health" indices for our Company.

### - Ad Hoc Surveys

Ad hoc surveys provided us with valuable insights on current issues the organization faces. In 2016, more than 15 projects took place, both qualitatively and quantitatively.

### - Customer Satisfaction Survey

The customer satisfaction survey is incorporated in the largest research program of the Company, which is in the form of tracker survey and is conducted in 7 waves each year. More specifically, we recorded and monitored the evaluation of the customer experience and the competition's in key issues. The areas investigated include a) the total experience with the provider, b) the experience with the coverage/network, c) the experience with plans and packages, d) the experience with the store, and e) the experience with the Call Center. The objectives of this research program is to monitor the above key indices and to compare them to the competition's performance. The findings of this survey enable us to design interventions / corrective actions so that our customers are always satisfied with our products and our services.

### - Customer Satisfaction Survey CSAT

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

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

need to provide advanced products and services that meet the needs and requirements of the modern consumer.

The customer satisfaction survey (CSAT) continued in 2016 and revealed the high level of interest and the Company's commitment toward its customers. The survey is automated, through a mechanism that enables random selection of 1/3 of incoming calls to the Mobile and Fixed Telephony Customer Service Departments respectively.

**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 2016 was 77.87%.**

In addition, we evaluate the NPS (Net Promoter Score) index incorporated in 2015 to the CSAT customer satisfaction questionnaire. The NPS index is a way to evaluate the relationship developed between a company and its customers. This index deduces the percentage of customers who would recommend the product or the services they use to others.

### **Natural Language Understanding (NLU) for the Customer Service numbers**

The NLU - Natural Language Understanding technology is a new technology that replaces the traditional and static IVRs. NLU provides the capability of combining the telephone number for which the subscriber needs service with his request and to forward the call to the unit responsible for the service. The number for which service is requested can be the same or a different one than the calling number.

The application of the NLU technology began on a pilot basis in 2016 to specific access numbers of the Customer Service Department and to a limited sample of home customers. This technology has benefits for the customer and the Company, simultaneously achieving call routing to the responsible service team. More specifically, it ensures:

- increase of customer satisfaction
- resolution / management from the 1st contact
- reduction of the total management time required per customer.

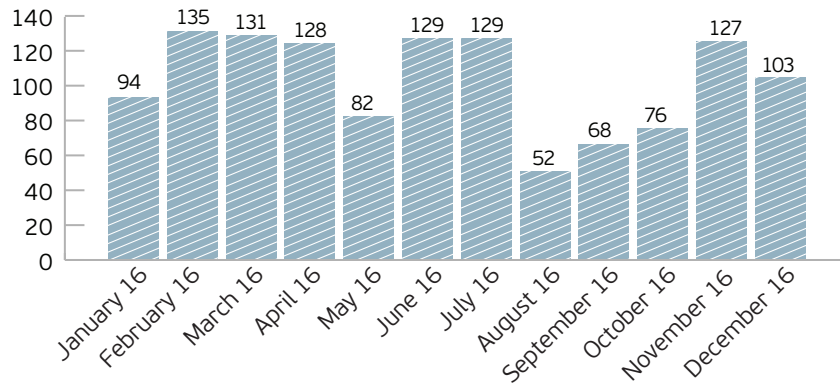
### **“Knowledge Base” information management platform**

Taking into account the constantly changing environment and the rapid developments in the sector of telecommunications, ensuring the daily and direct information of the Customer Service Department is considered necessary. Posting the updates every day to the integrated information management platform “Knowledge Base” is an internal knowledge tool and provides valid information since it is updated on a daily basis.

The Customer Service Department representatives undertake the role of “consultant”, providing high level of service, before as well as after the sale.

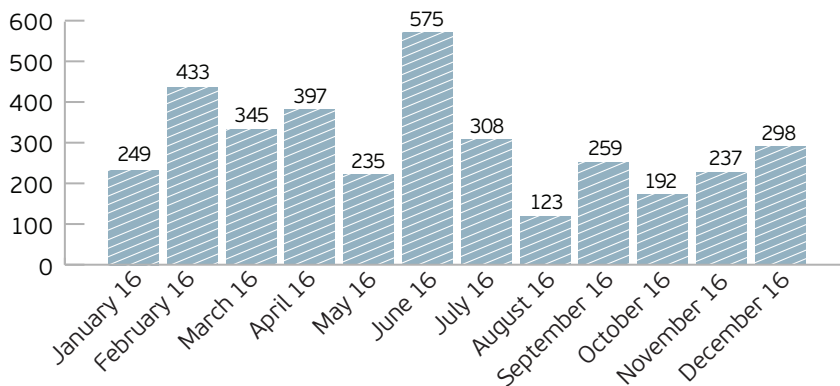
Following is a diagram illustrating the number of updates posted to the Customer Service Department for 2016.

**FIGURE 8.1**  
**ANNOUNCEMENT**



In addition, following is a diagram illustrating the number of updates made to the “Knowledge Base” articles for 2016:

**FIGURE 8.2**  
**ARTICLES**



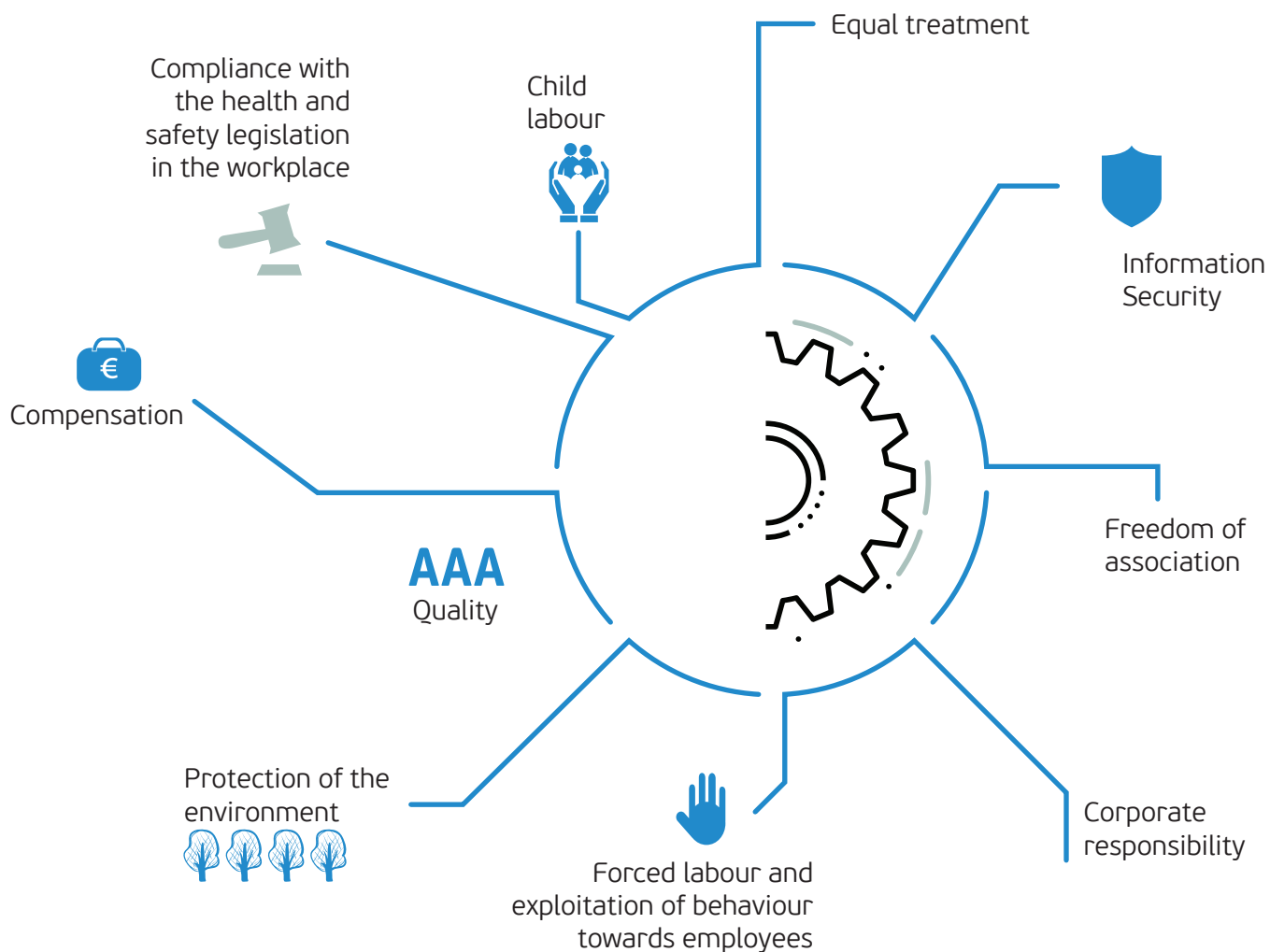
### **Systems upgrade for better service**

In 2016 we upgraded the application (Siebel) which is the main system that manages all subscribers (individuals and business subscribers) by the Customer Service Department. The objective of this upgrade was to improve the internal procedures on the management of the entire customer base more effectively, so as to ensure the immediate handling and resolution of the subscribers' requests. It should be noted that with the completion of the upgrade, the access to the data of mobile and fixed telephony subscribers is immediate, meeting the constantly increasing needs of the market.

# Responsible Procurements

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

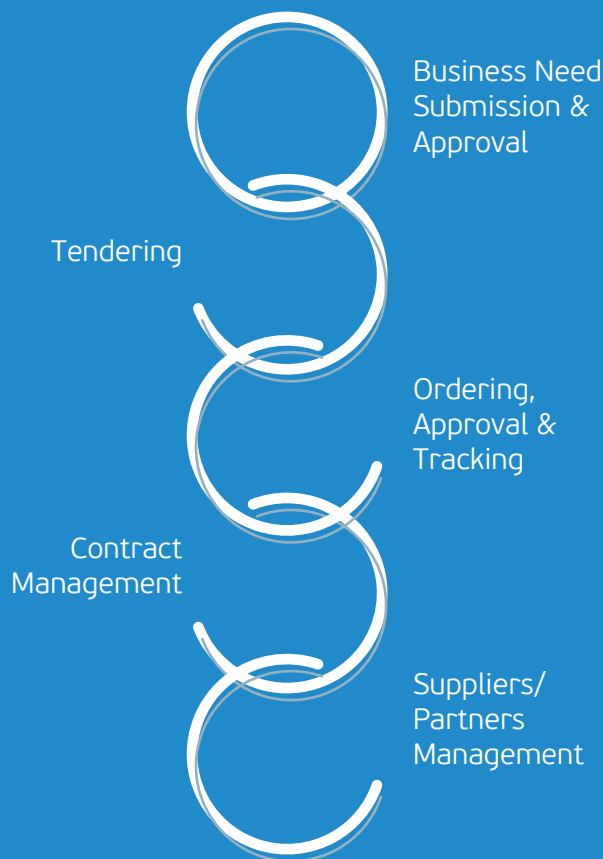
Using specific forms, general conditions of cooperation and / or other procedures, we expect any supplier who is interested in joining the list of suppliers that work with our Company to comply with the obligations relevant to its business activities arising from the national and European legislation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



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

## Evaluation of suppliers

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

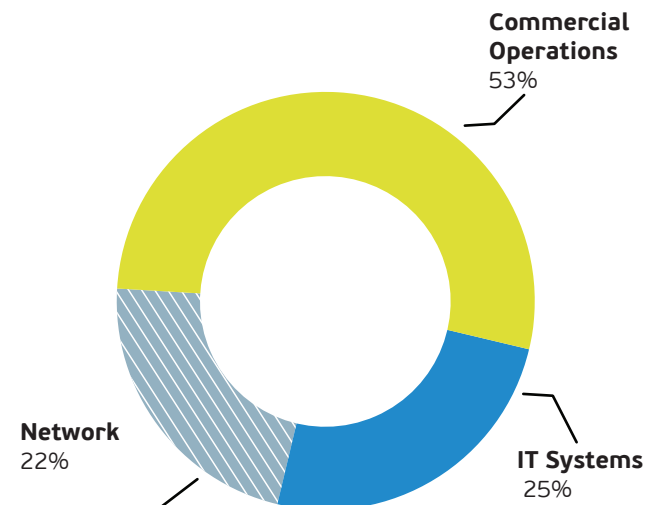


In 2016 and in the context of promoting Corporate Responsibility in our supply chain, we sent the "Code of Conduct of WIND Hellas" to all new suppliers, having set as a necessary condition of cooperation the acceptance of the Code. In any case, the acceptance of the General Procurement Conditions, the Confidentiality Agreement and the Code of Conduct, as well as completing questionnaires related to the business activity, are just some of the main requirements for a new supplier to be included in our supply chain base.

We evaluate our suppliers in accordance with the requirements of the management systems under ISO 9001 and ISO 14001, monitor tenders and perform inspections when appropriate. In 2016 the relevant department continued to make regular visits to the premises of critical suppliers in order to verify they are in complete compliance with the requirements of the respective projects, and that they meet the above-mentioned specifications.

Based on our specific procedures we evaluated 77 of our largest suppliers. The 66 of these suppliers were found to fully meet the corporate performance criteria, while in 11 cases further monitoring was found to be required, and thus we proceeded to all the necessary actions, taking all necessary measures.

**FIGURE 8.3**  
PERCENTAGE OF SUPPLIERS EVALUATED PER CATEGORY OF PRODUCT/SERVICE



At the same time, adopting specific procedures, we evaluated 12 critical suppliers of Victus of which 8 were found to fully meet the corporate performance criteria, while 4 were subject to relevant monitoring.

### Supporting the local community

We try to support the local markets mainly with respect to contractor / building projects, where we use companies of each region where possible, while with respect to purchasing promotional materials and printing work we always use Greek companies.

**The percentage of spending on local suppliers (Greek companies) was about 93% of WIND's total expenditures for 2016.** The majority of spending on non-local suppliers concerns purchases of telecommunications products for which there is no representation of the company in Greece.







## OUR PERFORMANCE

We present our progress for 2016 and our commitments and objectives for the current year. We also describe the areas in which we made progress, where we exceeded our objectives as well as the areas where there is room for improvement.

# Objectives & Results 2016

## Corporate Governance

Code of Conduct revision.	Transferred to 2017.
Continuous redesign and improvement of our procedures and simplification aiming at Operational Excellence.	√
Redesigning the crisis management procedure and communications planning.	Started in 2016 and will be completed in the first four months of 2017.
Adoption of the standard ISO 19600 "Compliance Management Systems".	√
Introduction of "No-refund Policy".	Transferred to 2017.
Continuous improvement and development of the Business Continuity Management System within the constantly evolving environment of telecommunications as well as the international standard ISO 22301:2012 (Social Security Business Continuity Management System).	√
Successful inspection of the Company based on the international standard ISO 22301:2012.	√

## Society

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

## Employees

Training on the axis Ethics-Communication-Culture.	√
Incorporation of Regulatory Compliance issues in the employee training program WS.	√
Repeating the survey Q4 2016.	√
Communication of risk management assessment results to all employees.	√

## Market

Reinforcing the customer-focused culture of our employees and implementing more actions to continually improve the experience of our customers in all points of contact.	√
Continuing and strengthening the bundle products for Fixed - Mobile and Internet with triple play solutions. The objective is for the triple play solutions to be a model of bundle products in the European market.	√
Providing new communication abilities in a strictly digital environment that will utilize technology to the fullest.	√
Providing online tools to the end user that will give the user the best image on the quality of his services, his account and their management.	√
Providing Fixed Telephony and Internet services to an increasing number of regions and simultaneous expansion of the availability of the VDSL service to even more customers.	√

## Environment

Replacement of old printers.	√
Continuing the internal awareness program of our employees on limiting the consumption of plastic packaging.	The program has been canceled.
Further increase of our subscribers who participate in the e-bill/MyWIND aiming to double the number of our registered subscribers over the next 2-3 years.	Increase of 22% compared to 2015.
100% recycling of all hazardous waste produced from our operation.	√

# Objectives 2017

## Corporate Governance

Completing the revision of the Code of Conduct.

The implementation of new policies: "Policy to combat corruption" and "No-refund Policy".

Continuous redesign and improvement of our procedures and simplification aiming at Operational Excellence.

Redesigning the crisis management procedure and communications planning.

The certification of our Company in accordance with the international standard ISO 22301:2012 (Social Security Business Continuity Management System). The constant improvement and development of the Business Continuity Management System in the scope of the constantly evolving environment of telecommunications and the regulatory requirements.

The re-certification of our Company in accordance with the updated International Standard ISO 9001:2015.

The certification of our Company in accordance with the International Standard BS OHSAS 18001:2007 on occupational health and safety.

The re-certification of our Company in accordance with the updated International Standard ISO 14001:2015.

## Society

Expanding our actions to improve the quality of life and dealing with the uncontrolled increase of stray animals.

Seeking new ways to support TEDx events across Greece.

Strengthening the investment in social networking media aiming to further infiltrate our actions for: a) safe use of new technologies by children and b) the running movement to a larger portion of the population. Continuing to support running champions and mountain running of medium and larger distances.

## Employees

The development of the HRMS platform aiming at the empowerment of the user.

Creating job opportunities in Greece and strengthening the talent retention mechanisms with respective initiatives, such as the Young Talents programs.

Strengthening the internal culture with initiatives that support cooperation between departments.

Providing complete care and "well-being" for our employees and their families through more actions in the scope of EY WIND.

Further support and promoting the corporate reputation of our Company as one of the most significant employers of choice in the Greek market.

Awareness program of employees on musculoskeletal problems due to sitting for many hours at work for office employees.

Communication of risk management assessment results to all employees annually or more frequently.

## Market

Reinforcing the customer-focused culture of our employees and implementing more actions to continually improve the experience of our customers in all points of contact. The constant growth of our subscriber base.

The best services provider with the use of NGA networks in Greece.

The best provider of bundle services for Fixed Telephony and Internet in Greece, and a point of reference for providers in Europe.

Offering high quality television services to customers of WIND Hellas.

The proper operation of our procedures, with the focus on implementing and completing projects that drastically upgrade the customer experience and the level of our services.

The expansion of the use of the new e-procurement tool and developing the effectiveness and efficiency of the Procurement department, so as to maximize the benefits to a greater degree.

The support and development of the quality characteristics of our supplier base and certifying all our suppliers, by signing general terms of procurement, completing related questionnaires and the acceptance of the Company's formal code of conduct.

Continuing the evaluation of our critical and major suppliers, through on-site visits.

## Environment

Continuing the renovation projects at facilities so as to concentrate equipment in a smaller area; with simultaneous projects to improve the energy efficiency of the telecommunications centers and evacuating facilities that are no longer being used.

The replacement of the corporate vehicle fleet.

Increase of registered subscribers to the electronic services.



## ABOUT THE REPORT

This 2016 Sustainability Report includes information on the Corporate Responsibility policies and programs of WIND Hellas, as well as our performance on actions that we developed aiming at sustainable development and entrepreneurship, placing our priority on four axes: the Market, our Employees, the Environment and Society.

This report covers our Company's activity for the year starting 1 January and ending 31 December 2016. This Sustainability Report is the tenth annual report we have published; the previous one was published in September 2016 and concerned the year 2015.

Our Corporate Responsibility Committee, which comprises representatives of the Company's main departments, worked to compile this Report as well as to collect all information contained therein. In some cases there were corrections to data of previous years due to the different method of data calculation.

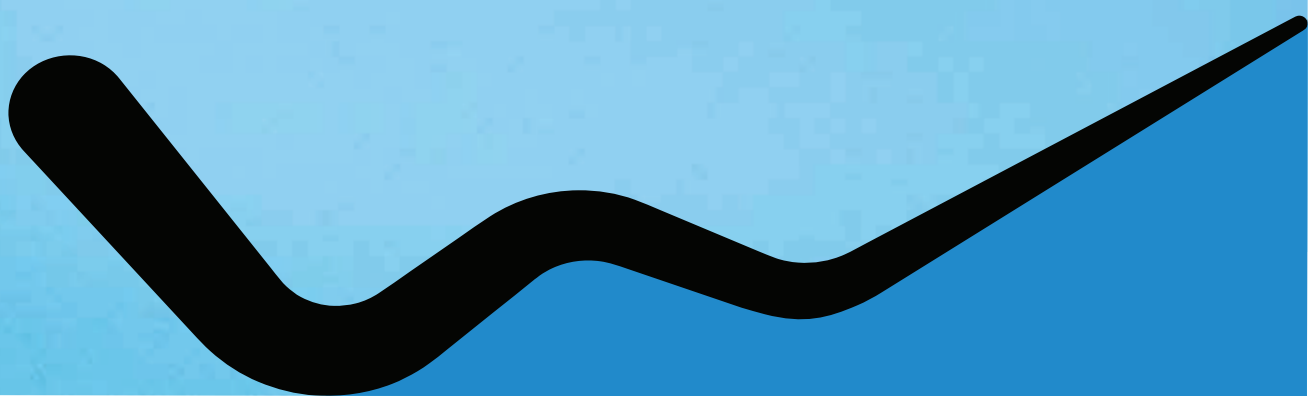
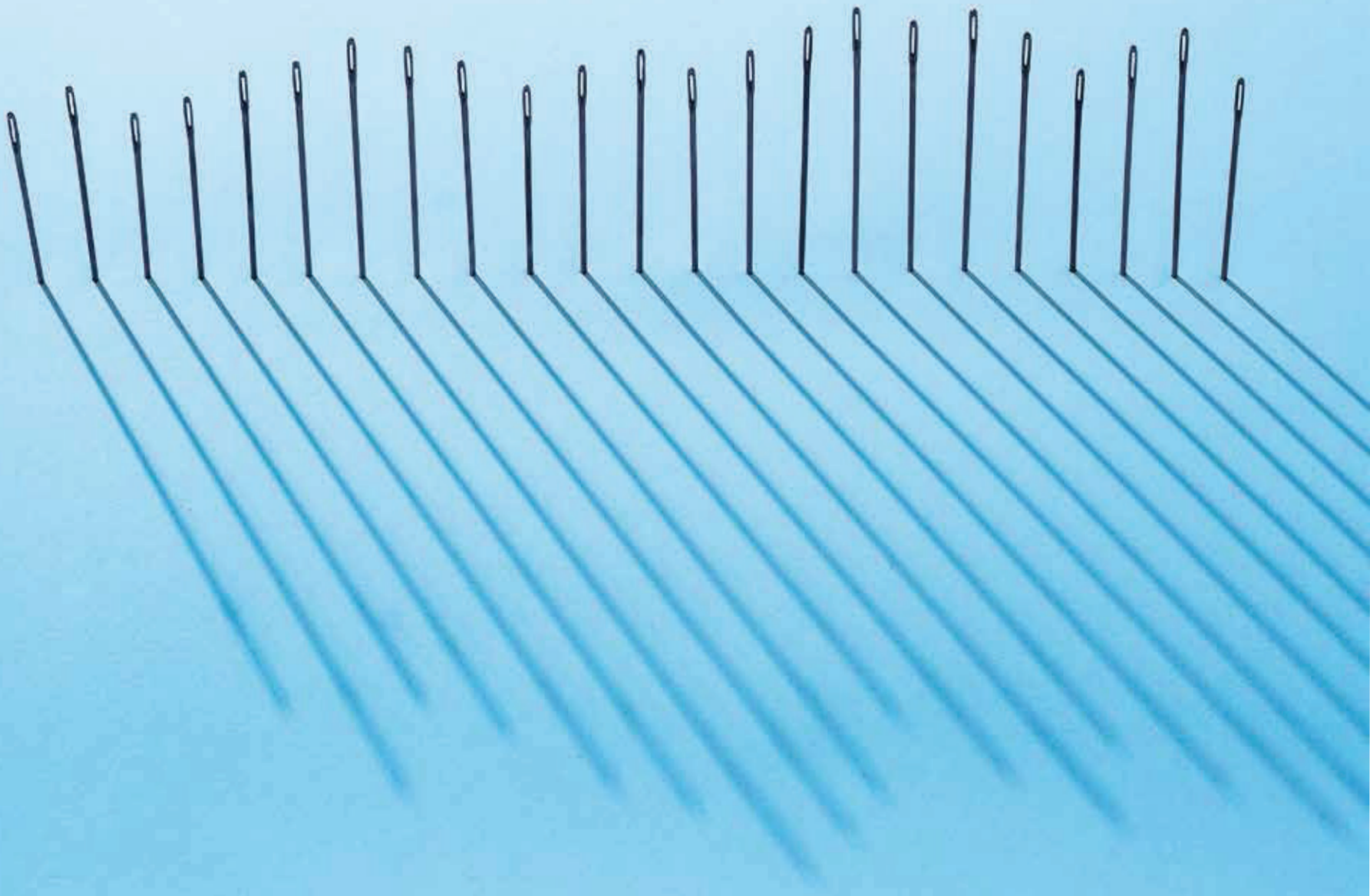
In order to determine and develop the content of the present Report, as was also the case in previous years, we took into account the Materiality analysis, the Principles and Goals of Sustainable Development, as set out in the UN Global Compact Standard and the 2030 Agenda, as well as the "core" guidelines of the G4 edition of the Global Reporting Initiative Guidelines.



# UN GLOBAL COMPACT: PROGRESS REPORT

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

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












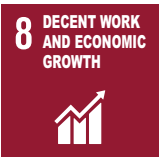
# APPENDICES / TABLES










Table of Significant Issues & Limits

Issues	Limits	
	Within	Outside
Protection of personal data	√	Regulatory Authorities / Customers
E/M Radiation	√	Local Government / Customers / Regulatory Authorities
Privacy of communications	√	Regulatory Authorities / Customers
Network investments	√	Customers / Government / Partners
Wages and benefits	√	
Governance and management	√	Regulatory Authorities
Safe use of new technologies	√	Customers / NGO / Regulatory Authorities
Quality of Services	√	Customers / Suppliers / Partners / Regulatory Authorities
Employee Health & Safety	√	Government / Partners / Suppliers
Promoting sustainable development through IT and communications products and services	√	Customers / Partners / Suppliers / Local Government



**SUSTAINABLE DEVELOPMENT GOALS**  
17 GOALS TO TRANSFORM OUR WORLD

Objective	Response of WIND	Reference in Report
	<p>We try to help with actions of significance, supporting socially vulnerable groups, while also offering quality products and services at affordable prices, meeting the communication needs of many organizations.</p> <p>(Running movement, Social product)</p>	page 41, 48
	<p>We support agencies and people in need by developing internal volunteerism.</p> <p>(Running movement, WIND Running Team)</p>	page 41
	<p>We have adopted a responsible approach with respect to monitoring and measuring the levels of electromagnetic radiation. We care for our employees health and safety, while also developing well-being programs. In addition, we inform the consumer public on the safe use of technology.</p> <p>(Electromagnetic radiation, Employee Health &amp; Safety, Program EY WIND, kids@ safety)</p>	page 72, 57, 62, 46
	<p>We provide information on the safe use of new technologies, supporting official organizations in educating children on the safe use of the Internet, while also promoting the “new talent” and the professional development of our employees.</p> <p>(kids@safety, WIND Young Talents, Business Days, “Job Pairs” Grow@WIND)</p>	page 46, 61, 47, 60, 58
	<p>We offer equal opportunities to all our employees throughout Greece, regardless of sex or other discrimination.</p> <p>(Human Rights &amp; Equal Opportunities)</p>	page 54
	<p>Even though the issue is not material to our Company’s activity, we contribute to the proper use of water in the offices and our facilities.</p> <p>(Employee Health &amp; Safety)</p>	page 57
	<p>We reinforce measures to increase energy efficiency by using environmentally friendly technologies.</p> <p>(Climate, Energy &amp; Energy Management, New Digital Stores)</p>	page 68, 79
	<p>We ensure excellent working conditions, benefits and advantages for all our employees, providing a comprehensive competitive benefits plan that rewards performance, skills development and overall corporate success.</p> <p>(Benefits)</p>	page 56

	<p>We invest in infrastructure and the development of our network with responsibility and sensitivity to public health and the environment, promoting technological innovation through services and products that contribute to sustainable development.</p> <p>(Investing in Development, Responsible Network Development, Promoting Sustainable Development)</p>	<p>page 11, 80, 81</p>
	<p>We promote the principle of non-discrimination, equal opportunity policies and the recognition of every individual's right to work. Moreover, aiming at the digital inclusion of populations, we meet communication needs across Greece.</p> <p>(Human Rights &amp; Equal Opportunities, Responsible Network Development, Social Product)</p>	<p>page 54, 80, 48</p>
	<p>We manage our waste responsibly and systematically reduce the use of paper. We support organizations that work with animal health in the city.</p> <p>(Waste Production and Management, Animal Action)</p>	<p>page 73, 47</p>
	<p>We inform our consumers with transparency and honesty on our products and services, and contribute to educating on the proper use of mobile phones and the Internet by children.</p> <p>(User Information, Responsible Marketing, Kids@safety)</p>	<p>page 82, 83, 46</p>
	<p>We constantly examine ways to reduce energy consumption and to increase energy efficiency with interventions to buildings and projects at a level of equipment as well as buildings.</p> <p>(Climate, Energy and Energy Management)</p>	<p>page 68</p>
	<p>Even though this is not a material issue for the Company, we manage our land waste with the ultimate goal of contributing to the reduction of marine pollution.</p> <p>(Waste Production &amp; Management)</p>	<p>page 73</p>
	<p>We take into serious consideration the protection of biodiversity promoting sustainability, we prepare environmental impact studies for base stations and since 2008 we have been implementing a certified environmental management system aiming at the protection and sustainable use of land ecosystems.</p> <p>(Environmental Management, Electromagnetic Radiation)</p>	<p>page 66, 72</p>
	<p>We work with integrity, developing rules of conduct and procedures that promote transparency and reinforce a culture of combating bribery and corruption.</p> <p>(Corporate Governance, Internal Audit, UN Global Compact. Independent External Verification Report WIND 2016 Sustainability Report)</p>	<p>page 30, 33, 97, 107</p>
	<p>We work with companies, recognized agencies and the State to develop infrastructure, services and programs in the scope of Sustainable Development.</p> <p>(Promoting Technological Innovation, Creating Value, Social Product, Running Movement, Cooperation with the Cyber Crimes Unit, TEDx)</p>	<p>page 27, 14, 48, 41, 46, 47</p>

**TABLE OF GRI - G4 INDICATORS. IN ACCORDANCE - CORE**  
Standard Disclosures

Indicator	Reference in Report	Page   Comment	External Assurance
<b>Strategy and analysis</b>			
G4-1	Message from the Chairman of the Board & CEO	8	√
G4-2	Products & Services	13	√
<b>Organizational Profile</b>			
G4-3		WIND Hellas Telecommunications SA	√
G4-4	The Company & Landmarks	12	√
G4-5	The Company & Landmarks	12	√
G4-6	The Company & Landmarks	12	√
G4-7		Commercial & Industrial SA	√
G4-8	Products & Services	13	√
G4-9	Financial Growth & Feature Figures	14	√
G4-10	Human Resources Data	53	√
G4-11	Human Resources Data	53	√
G4-12	Responsible Procurements	87	√
G4-13	Financial Growth & Feature Figures	14	√
G4-14	Management Practices   Internal Audit   Business Continuity Management	31, 33, 37	√
G4-15	Economic, environmental and social maps, principles or third party initiatives	Global Compact, Greek Sustainability Code, Sustainable Greece 2020. SDGs.	√
G4-16	Participation	15	√
<b>Important Issues &amp; Limits</b>			
G4-17	Financial Growth & Feature Figures	14	√
G4-18	We approach important issues responsibly	26	√
G4-19	We approach important issues responsibly	26	√
G4-20	Table of Significant Issues & Limits	99	√
G4-21	Table of Significant Issues & Limits	99	√
G4-22	Emissions	70	√
G4-23	We approach important issues responsibly   Table of Significant Issues & Limits	26, 99	√
<b>Dialogue with stakeholders</b>			
G4-24	Dialogue with stakeholders   Employee opinion survey   Customer satisfaction	23, 61, 84	√
G4-25	Dialogue with Stakeholders	23	√
G4-26	Dialogue with Stakeholders	23	√
G4-27	Table of Dialogue Development with our Stakeholders 2016	23, 24	√
<b>Profile disclosure</b>			
G4-28	About the report	94	√
G4-29	About the report	94	√
G4-30	About the report	94	√
G4-31	Communication	back page	√
G4-32	About the report   Table of GRI - G4 Indicators   Independent External Verification Report	94, 102, 107	√
G4-33	Independent External Verification Report	107	√

## Governance

G4-34	Corporate Responsibility Governance Structure   Management Practices   Committees   Internal Audit	22, 31, 32, 33	√
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## Ethics and integrity

G4-56	Responsible Management   Code of Conduct   Management Systems & Certifications   Responsible Marketing	30, 34, 36, 83	√
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## TABLE OF GRI - G4 INDICATORS. IN ACCORDANCE - CORE

### Detailed Disclosures

Management Approach Disclosures & Indicators	Reference in Report	Page	External Assurance
<b>Economy</b>			
<b>Important Issues: Economic Performance</b>			
G4-DMA	Creating Value	14	√
G4-EC1	Socio-economic impact   Financial growth & feature figures	4, 14	√
<b>Important Issues: Indirect Economic Impacts</b>			
G4-DMA	We promote responsible entrepreneurship and technological innovation	27	√
G4-EC7	Socio-economic impact   Financial growth and feature figures   We promote responsible entrepreneurship and technological innovation   Social product	4, 14, 27, 48	√
G4 - EC9	Supporting the local community	88	√
<b>Environment</b>			
<b>Important Issues: Energy</b>			
G4-DMA	Environmental management   Climate, energy & energy management	66, 68	√
G4-EN3	Climate, Energy and Energy Management	68-71	√
G4-EN5	Climate, Energy and Energy Management	68	√
G4-EN6	Climate, Energy and Energy Management	68-72	√
<b>Important Issues: Emissions</b>			
G4-DMA	Environmental Management	66	√
G4-EN15	Climate, Energy and Energy Management	68-72	√
G4-EN16	Climate, Energy and Energy Management	68-72	√
G4-EN17	Climate, Energy and Energy Management	68-72	√
G4-EN19	Climate, Energy and Energy Management	68-72	√
G4-EN20	Greenhouse gases that harm the ozone (ODS)	71-72	√
<b>Important Issues: Effluents and Waste</b>			
G4-DMA	Environmental management   Waste production and management	63, 73	√
G4-EN23	Waste Production & Management	73-75	√
G4-EN25	Waste Production & Management	73-75	√
<b>Important Issues: Compliance</b>			
G4-DMA	Environmental Management	66	√
G4-EN29	Environmental Management	67	√

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<b>Society</b>				
<b>Subcategories: Labour Practices and Decent Work</b>				
<b>Important Issues: Employment</b>				
G4-DMA	Human Resources Data		53	√
G4-LA1	Human Resources Data		53-55	√
G4-LA2	Benefits		56	√
<b>Important Issues: Occupational Health and Safety</b>				
G4-DMA	Employee Health & Safety		57	√
G4-LA6	Employee Health & Safety		57	√
<b>Important Issues: Training and Education</b>				
G4-DMA	Employee Growth and Development		58	√
G4-LA9	Education		59	√
<b>Important Issues: Diversity and Equal Opportunities</b>				
G4-DMA	Human Rights & Equal Opportunities		54	√
G4-LA12	Employee distribution		54, 55	√
<b>Subcategories: Human Rights</b>				
Important Issues: A	Evaluation of Suppliers on Human Rights Issues			
G4-DMA	Responsible Procurements		87	√
G4-HR11	Responsible Procurements		87	√
<b>Subcategories: Society</b>				
<b>Important Issues: Local Communities</b>				
G4-DMA	Society: Our approach		39-41	√
G4-S01	Participation, awareness, contribution   Electromagnetic radiation		41-49, 72	√
<b>Important Issues: Anti-Corruption</b>				
G4-DMA	Internal Audit		33	√
G4-S03	Internal Audit		33-36	√
G4-S04	Internal Audit		33-36	√
<b>Important Issues: Anti-competitive behaviour</b>				
G4-DMA	Responsible marketing		83	√
G4-S07	Responsible marketing		83	√
<b>Subcategories: Product Responsibility</b>				
<b>Important Issues: Customer Health &amp; Safety</b>				
G4-DMA	Responsible Network Development		80	√
G4-PR1	Electromagnetic radiation   Responsible services   Responsible marketing		72 82, 83	√
<b>Important Issues: Branding of products &amp; services</b>				
G4-DMA	Customer Satisfaction		84	√
G4-PR5	Customer Satisfaction		84-86	√
<b>Important Issues: Customer Privacy</b>				
G4-DMA	Intellectual property rights & communication privacy		84	√
G4-PR8	Intellectual property rights & communication privacy		84	√

## Table of compliance with the Greek Sustainability Code

Pillar	Criteria	Reference
STRATEGY	1. Strategic Analysis & Action	Message from the Chairman of the Board & CEO (pg. 8) Our Corporate Responsibility Strategy (pg. 21) We promote the Sustainable Development Goals (pg. 22) Participation (pg. 15)
	2. Materiality	We approach important issues responsibly (pg. 26) Table of Significant Issues & Limits (pg. 99)
	3. Objectives	Our performance (pg. 92)
	4. Value Chain Management	Socio-economic impact (pg. 4) Products & Services (pg. 13) Creating Value (pg. 14) Responsible Procurements (pg. 87) Table of Significant Issues & Limits (pg. 99)
MANAGEMENT PROCEDURE	5. Responsibility	Governance Structure of our Corporate Responsibility (pg. 22) Management Practices (pg. 31)
	6. Rules & Procedures	Responsible Management (pg. 30) Our Policies (pg. 31) Internal Audit & Risk Assessment (pg. 33) Code of Conduct (pg. 34) Management Systems & Certifications (pg. 36) Business Continuity Management (pg. 37) Internal Work Regulation (pg. 55) Responsible Marketing (pg. 83)
	7. Recording & Monitoring	About the Report (pg. 95) Table of GRI.G4 Indicators (pg. 102)
	8. Remuneration Policies & Incentives for Sustainable Development	Management Practices (pg. 31) Benefits Plan (pg. 56) Two-way communication (pg. 61) Volunteerism - Social Contribution (pg. 62)
	9. Dialogue with Stakeholders	Dialogue with stakeholders (pg. 23)
	10. Product Responsibility & Innovation	Responsible Network Development (pg. 80) Promoting Sustainable Development (pg. 81) Responsible Services (pg. 82) Climate, Energy and Energy Management (pg. 68)
	11. Use of Natural Resources	Climate, Energy and Energy Management (pg. 68)
	12. Resource Management	Environmental Management (pg. 66) Climate, Energy and Energy Management (pg. 68) Waste Production & Management (pg. 73)
	13. Emissions & Climate Change	Emissions (pg. 70) Greenhouse gases that harm the ozone (ODS) (pg. 71)
	14. Labour Rights	Our approach (pg. 52) Human Resources Data (pg. 53) Human Rights & Equal Opportunities (pg. 54) Benefits (pg. 56) Maternity leave (pg. 58) Employee Growth and Development (pg. 58) Two-way communication (pg. 61)
SOCIETY	15. Equal Opportunities	Human Rights & Equal Opportunities (pg. 54) Employee Health & Safety (pg. 57) Employee Growth and Development (pg. 58) Managing talent & succession planning (pg. 61) Volunteerism - Social Contribution (pg. 62)
	16. Employment	Human Resources Data (pg. 53) Employee Health & Safety (pg. 57) Employee Growth and Development (pg. 58) Managing talent & succession planning (pg. 61)
	17. Human Right in the Supply Chain	Responsible Procurements (pg. 87)
	18. Support of Local Communities	Society (pg. 39)
	19. Participation in Initiatives & Political Influence	Participation (pg. 15)
	20. Anti-Corruption	Code of Conduct (pg. 34)





# EXTERNAL ASSURANCE REPORT FOR WIND HELLAS 2016 SUSTAINABILITY REPORT

The External Assurance Report was conducted by the Centre for Sustainability and Excellence (CSE) and refers to the 2016 Sustainability Report of WIND Hellas for the period between January 1st 2016 and December 31st 2016.

The aim of the assurance process is to provide confirmation to the stakeholders of WIND Hellas for the accuracy, the reliability and the objectivity of the information in the sustainability report, and that the sustainability report contains all the material issues for WIND Hellas and for its key stakeholder groups.

The 2016 Sustainability Report of WIND Hellas has been conducted according to the G4 reporting guidelines (“in-accordance core”) of the Global Reporting Initiative (GRI).

## Scope of Work

The scope of work contained the review of the activities described in the 2016 Sustainability Report, as well as the information and data about the sustainability performance of WIND Hellas during the reporting period. Specifically, it included:

1. Statements, information and performance data contained in the Report.
2. The process WIND Hellas followed for the determination of the material issues contained in the Report, and the management's approach towards these material issues.
3. Data and information contained in the Report according to the guidelines of the G4 reporting guidelines of the Global Reporting Initiative, as presented in the GRI Index Table.

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

## General Conclusions

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

- The description of the activities and performance of WIND Hellas during 2015, as well as the manner in which they have been described in the Report, is accurate.
- WIND Hellas complies with the principles of inclusivity, materiality and responsiveness of the AA1000 Assurance Standard.

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

## Main Observations and Proposals

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

- The adaptation of the agenda of the United Nations with the 17 goals for Sustainable Development (SDGs), with the decision for active and effective contribution in promoting the population's wellbeing and prosperity, in combating poverty and in environmental protection.
- The active support of the Greek society through supporting innovative ideas, sports, education and promoting social solidarity and environmental consciousness.
- The timeless commitment to educating and developing our employees, as is evident by the 23.378 hours of training, as well as from the workshops conducted for the evaluation

and improvement of our employee development process (Grow@WIND).

- Planning and implementing the Re-Think program, which aims at supporting our executives and maximizing their creativity, talents, experience and know-how.
- The participation, for the first time, in the Junior Achievement Greece initiative.
- The awards received by the Corporate Responsibility Index (Gold Award and Best Progress Gold Award) for our efforts and strategy in corporate responsibility, and the first award in the National Customer Service Awards by the Hellenic Institute for Customer Service.
- The reduction of our total energy consumption, through projects in buildings and equipment, by 780.000KWh.

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

- With respect to the principle of inclusivity, WIND Hellas should maintain and aim at further developing its stakeholder engagement and communication model.
- With respect to the principle of materiality, WIND Hellas should maintain the existing processes for the determination of the material issues and aim at further developing them, for example by increase the stakeholder groups participating in workshops for the determination of material issues. At the same it is recommended to characterize as material issues those issues which have been deemed as material by the company and/or the stakeholder groups.
- With respect to the principle of responsiveness, WIND Hellas should maintain and continue enhancing the existing approach about incorporating the expectations and needs of its key stakeholder groups into products, services and programs it develops.
- WIND Hellas should continue, and aim at further expanding, the use of tools and innovative methodologies to monitor its sustainability performance.
- Due to the increasing importance of managing a sustainable supply chain, WIND Hellas should maintain and continue empowering the incorporation of its sustainability policies into its supply chain.
- WIND Hellas should maintain and continue empowering its environmental efforts, which are part of its long-term commitment towards environmental protection and responsibility.

## Findings and conclusions about the Principles

- Principle Of Inclusivity – how the key stakeholder groups were identified and how WIND Hellas communicated with them about issues related to sustainability. The communication activities with the stakeholders groups involved all the key stakeholder groups of WIND Hellas. Also, WIND Hellas has implemented the appropriate principles during the development of its approach towards sustainability.
- Principle Of Materiality – the process of evaluating the sustainability issues in order to select the material ones to be included in the report. The process WIND Hellas followed for determining the material sustainability issues provides a balanced representation of WIND Hellas sustainability performance. Conducting workshops for the determination of materiality, with the participation of member of key stakeholder groups is an acceptable and effective method for the qualitative determination of materiality.
- Principle Of Responsiveness – how WIND Hellas responded to the issues that were of concern to the stakeholders and how this process is described in the Report. WIND Hellas has applied the principle of responsiveness during the selection of the issues to be included in the Report, as well as to the manner to which they are represented in the Report.
- Specific Performance Information. The quantitative data related to GRI indicators have been collected and presented in the Report with the best possible and commonly acceptable manner. Indicatively, during the assurance process the coverage by WIND Hellas of the following indicators was reviewed:
  - Greenhouse gas emissions (Scope 1, 2 & 3) and their reduction.
  - Energy consumption and energy intensity.
  - Reductions in energy consumption.
  - Measurement of electromagnetic radiation, as well as the company's actions regarding mitigating the impacts to local communities.
  - Production and management of waste.
  - Emissions of ozone depleting substances.
  - Confirmation of statements about the non-existence of monetary fines or sanctions regarding non-compliance to environmental laws and regulations.
  - Benefits to the company's employees.
  - Employee health and safety.

- Workforce characteristics.
- Actions and policies regarding anti-corruption.
- Confirmation of statements regarding the non-existence of monetary fines or sanctions about non-compliance to laws and regulations about anti-competitive behavior.
- Employee training and development.
- Percentage of local suppliers.
- Process, and criteria, for selecting and evaluating the company's suppliers.
- Employee satisfaction survey.
- Non-discrimination and equal rights.
- Indirect economic impacts regarding the development and the impacts of investemnts in infrastructure and relative services.

## Methodology

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

- Review and analysis of the processes for identifying and communicating with the company's key stakeholder groups.
- Review and analysis of the process for identifying and determining the sustainability issues that were included in the Report.
- Conducted meetings and interviews, at the company's offices, with selected executives of WIND Hellas which have the operational responsibility for sustainability issues, as well as with members of the Social Responsibility Team of WIND Hellas, in order to understand the administrative structure for managing sustainability issues, the stakeholder engagement process, and the implementation and monitoring of sustainability policies and activities.
- Conducted random reviews and analysis of data and information regarding the basic performance indicators of WIND Hellas. This specific review does not include an evaluation/validation of the operational efficiency of the information systems that were used to collect and process data.
- Reviewed the information and supporting material that support the claims made in the Report.
- Reviewed the Report with respect the principles of the assurance standard and of the G4 reporting guidelines of the GRI in order to verify compliance to those principles.

## Exceptions and Limitations

Information that relate to the following were not included in the assurance process:

- Activities outside the reporting period or the boundaries of the Report.
- Statements about the positions of WIND Hellas.
- Financial data which were derived from the Annual Financial Report of WIND Hellas which is assured by an external financial auditor.
- Content of websites or tests by third parties.

## Responsibilities of WIND Hellas and the External Assurance Provider

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

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

## Independence, Impartiality and Competence Statement of CSE

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

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

On behalf of the Assurance Team

Nikos Avlonas

CSE President



# WIND

We thank you for reading this report. For further information please contact:

**WIND Hellas**

Corporate Affairs Department, 66 Kifissias Avenue, 151 25 Maroussi, Tel.: 210 6158317 & Fax: 211 9993908, email: [csr@wind.gr](mailto:csr@wind.gr)

You can send your comments to: [csr@wind.gr](mailto:csr@wind.gr)