



Report Application Level	C	C+	B	B+	A	A+
Standard Disclosures						
Profile Disclosures	Report on: 1.1 2.1 - 2.10 3.1 - 3.8, 3.10 - 3.12 4.1 - 4.4, 4.14 - 4.15		Report on all criteria listed for Level C plus: 1.2 3.9, 3.13 4.5 - 4.13, 4.16 - 4.17		Same as requirement for Level B	
Disclosures on Management Approach	Not Required	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured	Management Approach disclosed for each Indicator Category	Report Externally Assured
Performance Indicators & Sector Supplement Performance Indicators	Report fully on a minimum of any 10 Performance Indicators, including at least one from each of: social, economic, and environment.**		Report fully on a minimum of any 20 Performance Indicators, at least one from each of: economic, environment, human rights, labor, society, product responsibility.***	Report Externally Assured 	Respond on each core and Sector Supplement* indicator with due regard to the materiality Principle by either: a) reporting on the indicator or b) explaining the reason for its omission.	

\* Sector supplement in final version

\*\* Performance Indicators may be selected from any finalized Sector Supplement, but 7 of the 10 must be from the original GRI Guidelines

\*\*\* Performance Indicators may be selected from any finalized Sector Supplement, but 14 of the 20 must be from the original GRI Guidelines



# REGARDING THIS REPORT

This '2010 Corporate Responsibility (CR) Report' is the sixth annual report on Hellenic Telecommunication Organization's (OTE) economic, social and environmental activities and performance. As in previous years, the Reports' primary focus and boundary is OTE S.A operations in Greece. In addition, summary information is provided for OTE Group economic performance and the CR activities of OTE Group subsidiaries.

OTE is committed to continuously and consistently incorporating the principles of Social Responsibility into the Company's corporate strategy. Accordingly, our CR Report focuses on both our CR strategy and its implementation through our 'Building Ties' program, which covers OTE's practices and performance in the Marketplace, towards Employees, the Environment, and towards Society in Greece.

For the first time, the 2010 Report is presented as both an "Online Report" at a specific microsite ([www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)), available within the OTE website [www.ote.gr](http://www.ote.gr), and as a summary Printed Report presented at the OTE Annual Meeting. Our approach to reporting online and in print is as follows:

- > Both the Online Report and Printed Report present a concise summary of our main activities and achievements for 2010 and our future goals.
- > The Online Report provides the

comprehensive level of information and data, and is the basis for the GRI Application Level Check and the External Assurance of the 2010 Report.

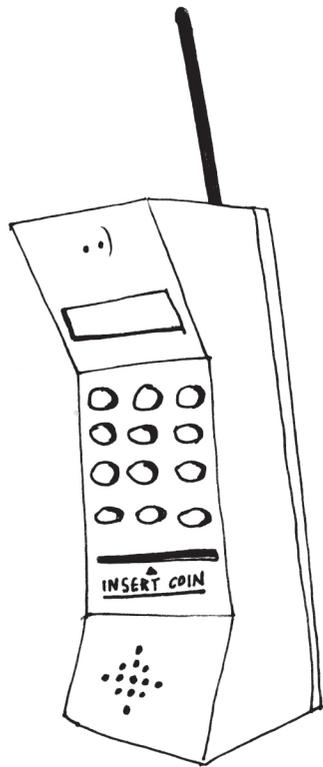
- > In addition, the CR initiatives that have been developed by OTE's subsidiary companies in Greece and abroad, are presented in the present document
- > The Printed Report indicates the topics on which additional information is provided in the Online Report.

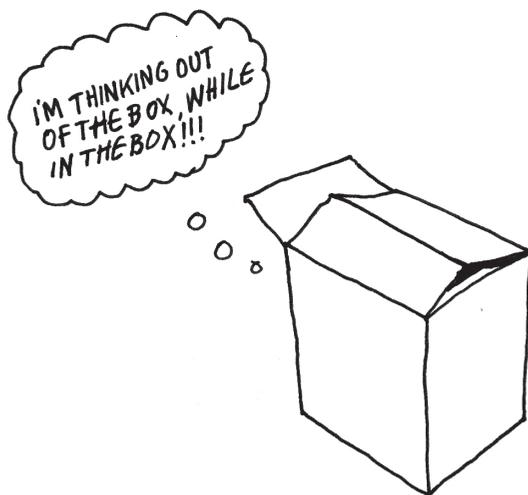
As in previous years, OTE's approach to CR reporting reflects our commitment to systematic harmonization with international CR standards. In 2010 we have again applied the 'G3 Guidelines of the Global Reporting Initiative (GRI), including the GRI 'G3.1' guidelines regarding diversity and human rights for the indicators on which we report.. And, as in previous years, we report on our ongoing commitment to uphold the principles of the United Nations Global Compact.

For the second successive year, our 2010 CR report is subject to external assurance covering both GRI

application and the AA1000 AccountAbility Principles Standard. During 2010, we have further developed our approach to applying the AA1000 Standard through further development and reporting of stakeholder dialogue mechanisms. Our overall approach to AA1000 and its three principles of inclusivity, materiality and responsiveness is outlined in the “CR and Business Strategy” section of this Report.

For your opinions and comments regarding our Corporate Responsibility Report, you can visit our website at: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en), or contact the OTE Corporate Responsibility Section via e-mail at [CorporateResponsibility@ote.gr](mailto:CorporateResponsibility@ote.gr) or telephone to: +302106118681, +302106118178, +30210 6115754, fax: +302106115873.





# CEO MESSAGE

During such difficult, defining times for Greece, OTE's commitment to be a competitive, innovative and socially responsible company is stronger than ever. As one of the largest corporate entities in Greece and South-East Europe, OTE is called to play the role of growth driver in an economy and society that is going through the most challenging time.

For OTE, progress in the market goes hand in hand with responsibility towards our people, customers, the environment and society. OTE's nationwide presence and role in everyday life gives the company unique contact every day with the hopes and ambitions, concerns and worries of the people. This has always shaped our social contributions, to charities and in emergencies, to education and young people, as well as our business decisions and investments, and it encapsulates the essence of our CR programme.

In 2010, and for the years ahead, OTE has defined its Corporate Responsibility priorities in these essential terms:

- Working every day to ensure OTE sustains its leading competitive position and contributes to the competitiveness of the wider economy;
- Strong commitment to good governance, transparency and fiscal responsibility, and to the welfare of all those who contribute to and make a living out of our Group's activities.
- Providing strong value and quality service to customers and investing continuously in the new technologies and network infrastructure to expand

broadband penetration and bridge the digital divide within society and geographically;

- Taking active steps towards contributing to a low carbon society and making telecoms a "green" sector.

As the pages of this Report show, OTE's actions prove that it seriously regards our business and social responsibilities as inextricably linked with the company's success. In these testing times, it is crucial for OTE to prove that we uphold our values and principles through actions. This is what OTE is determined to do and, with ambition and optimism, we plan to continue to strive to achieve our goals in Greece and all our regional markets.



**Michael Tsamaz**  
**Chairman of the Board of Directors**  
**& Chief Executive Officer of OTE SA**

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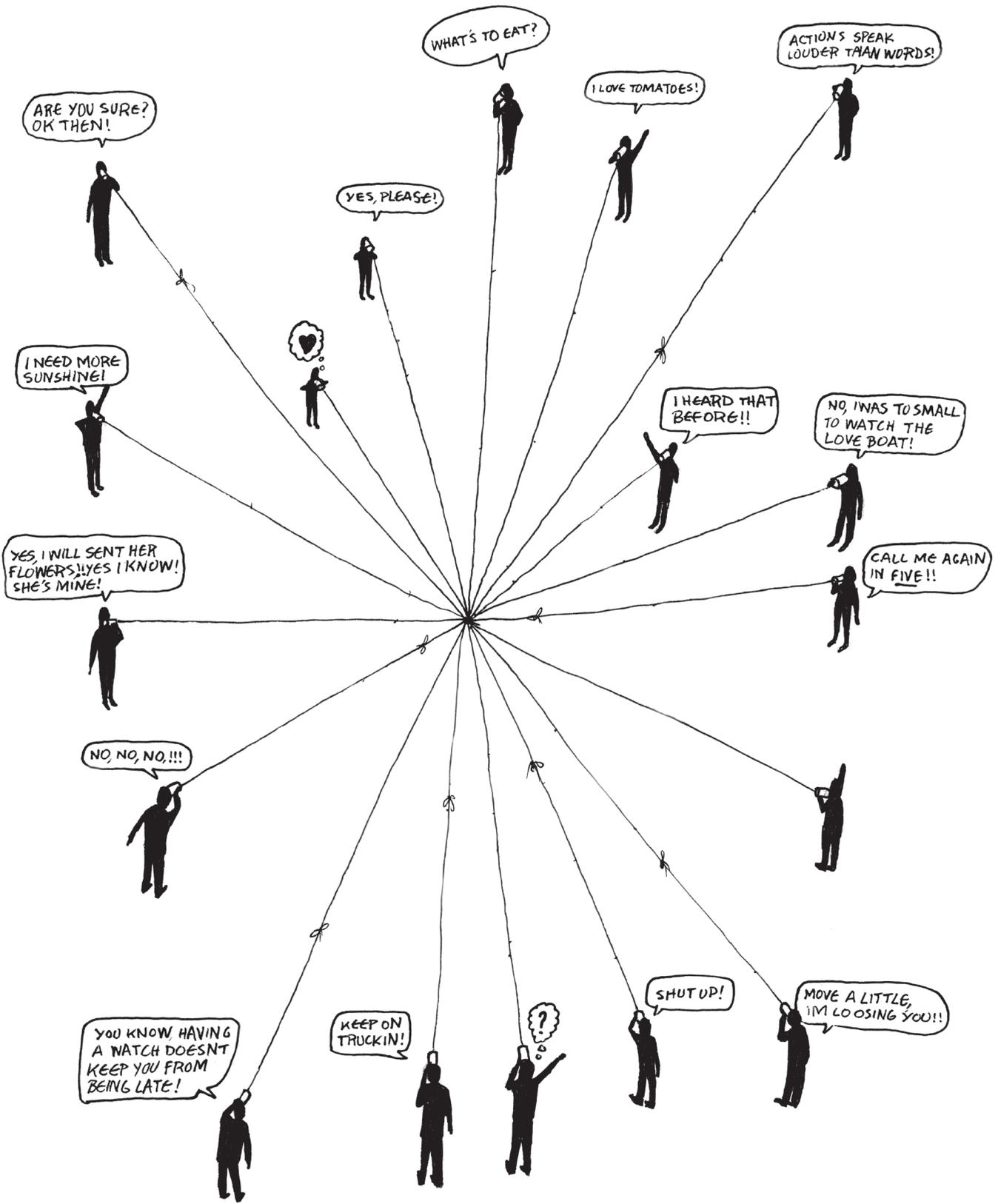
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'Hellenic Telecommunications Organisation S.A. ('OTE S.A.' or 'OTE') was established on in 1949, and its' headquarters are currently based in the Municipality of Maroussi. OTE Group is the largest telecommunications company in the Greek market, providing broadband and fixed telephony services to Greek and international companies, consumers and public sector bodies. Moreover, it offers mobile telephony services, Internet access, digital communications, leased line services and high-speed data communication.

*Basic figures for OTE S.A. for the twelve-month ending 31 December 2010*

<i>Number of employees</i>	<i>10,925 employees (regular personnel)</i>
<i>OTE S.A. turnover</i>	<i>EUR 2169.8 million</i>
<i>Total capitalisation</i>	<i>EUR 3.6 billion</i>
<i>Share price (30 Dec 2010)</i>	<i>EUR 6.13 (as a total number)</i>

*Detailed information can be found on OTE's Investor Relations website. <http://www.ote.gr/portal/page/portal/InvestorRelation/>*

# OTE GROUP

The Hellenic Telecommunications Organisation (OTE S.A.) is the largest telecommunications providers in Greece and, along with its subsidiary companies, it currently ranks among the leading telecommunications groups in South-East Europe, operating in Romania, Bulgaria, Serbia and Albania.

OTE Group owns 20% in Telekom Serbia, the largest telecommunications provider in Serbia. Moreover, as of 2009, OTE Group has 100% ownership of GERMANOS, the largest company in South-East Europe trading in technology products.

Aside from broadband services, OTE Group offers fixed and mobile telephony, satellite connections, high-speed data communication and leased line services. OTE Group employs approximately 32,600 people in 5 countries, with a Group turnover of EUR 5,482.8 million.

*Detailed information regarding OTE shareholdings in other companies as well as Group financial details,*

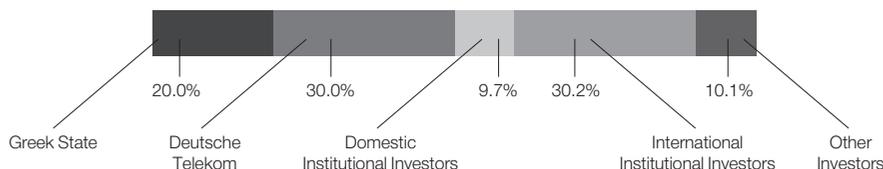
*can be found on OTE's Investor Relations website:*

<http://www.ote.gr/portal/page/portal/InvestorRelation/BusinessOverview/WhoWeAre/OTEToday>

## OTE OWNERSHIP STATUS / SHAREHOLDER BREAKDOWN

On the basis of the shareholder list of 31 December 2010, the share structure of the Company was the following:

- > Greek State: 20.0%
- > Deutsche Telekom: 30.0%
- > International Institutional Investors: 30.2%
- > Domestic Institutional Investors: 9.7%
- > Other Investors: 10.1%
- > TOTAL: 100



**OTE Share Structure**

OTE shares are traded in the following stock exchanges:

- > Athens Stock Exchange (ordinary nominal shares)
- > London Stock Exchange (in the form of Global Depositary Receipts -GDRs-)
- > Following its de-listing from the New York Stock Exchange, OTE American Depositary Shares (ADS) will now be traded in the OTC market, under the HLTOY ticker, with the Level I ADSs programme. OTE continues to fulfil its reporting obligations towards the U.S. Securities and Exchange Commission.

## **OTE GROUP KEY BUSINESS DEVELOPMENTS**

- > OTE notifies NYSE of its intention of delisting from the New York Stock Exchange.
- > OTE announces its decision to implement the dissolution and liquidation of 'OTE PROPERTIES AEEAP' Company.
- > OTE announces a series of extensive Management reshuffles, aiming at reinforcing its organisational structure and its operation at Group level.

*Detailed information is available at: <http://www.ote.gr/portal/page/portal/InvestorRelation/OTEIRMain-Page>*

# VISION, MISSION & BUSINESS STRATEGY

OTE operates in a rapidly changing telecommunications environment, which is affected by developments within Europe, by changes and advances taking place worldwide, by the evolution of the services offered by Telecommunications Providers, by the increasing intensity of competition, as well as by the requirements of the regulatory and legislative framework.

OTE's objectives primarily target sustainable development and increased competitiveness, by offering high-quality products, services and customer care and by providing 'combo-packages', as well as by simultaneously tapping into synergies operating at intra-Group level.

## VISION

OTE's vision is to ensure the growth of the Company and to maintain its leading position in the market, by offering the best-possible experience to its customers, both in Greece as well as within the broader South-East European market.

## MISSION

- > Achieving profitable and sustainable growth, taking into account the conditions prevailing in the current exceedingly competitive market;
- > Consolidating market share and creating new sources of revenue (IP-TV, satellite TV, ICT);

- > Fostering closer relations with customers and offering high-quality services based on innovative technologies;
- > Further developing and expanding its portfolio of broadband services (VDSL2);
- > Reducing operating costs and, by extension, improving the price of its service offering, in regard to both existing as well as new services;
- > Training its workforce, thus further developing the abilities and skills of its employees across all levels in the hierarchy;
- > Bringing added value to the markets where it operates, through the adoption of Corporate Responsibility principles.

## BUSINESS STRATEGY

In the context of the serious economic crisis prevailing in all market sectors, which also specifically affects the telecommunications market environment, the Company has adopted the following primary strategic objectives:

- > Offering innovative high-speed solu-

tions, on the basis of its comprehensive network infrastructure, in such a manner as to generate value both for its shareholders as well as for society;

- > Expanding broadband penetration in the Greek market and maintaining OTE's dominant position, by fully tapping into the Company's competitive advantages;
- > Enhancing customer service, by providing more substantial and rapid after-sales support;
- > Expanding and upgrading the OTE network, aiming at the gradual transition to a "new generation" network;
- > Achieving equitable treatment of OTE by regulatory bodies;
- > Incorporating the principles of Corporate Responsibility within the Company's business plans.

OTE's vision, mission and business strategy, as well as its relations with Stakeholders, are governed by corporate and moral values and are set forth in the Company's Code of Ethics and Business Conduct.

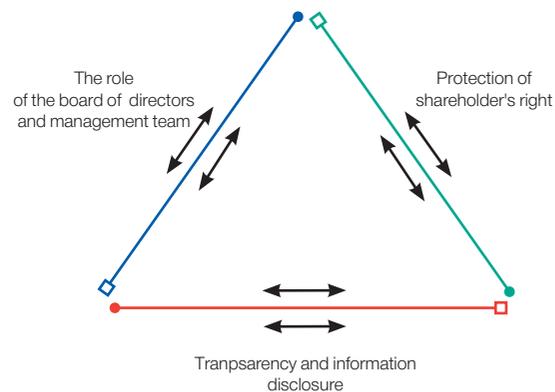
*Further information is available at: <http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/OurPrinciples>*

# CORPORATE GOVERNANCE

OTE aspires to the implementation of optimum corporate governance practices, based on best practices adopted at the international and European levels, spanning the entire spectrum of its business operations. The Company, by reinforcing its internal procedures and administrative structure, ensures not only its compliance with the regulatory framework, but also the fostering of a corporate culture founded on the values of ethics and of safeguarding the interests of shareholders and all stakeholders.

The three primary pillars underpinning the implementation of the corporate governance rules and practices within the OTE Group involve:

- > The role of the Board of Directors (scope of duties, composition, replacement and stepping down of members, committees) and of Executive Management;
- > The protection of shareholders (General Shareholders' Meeting, shareholder minority interest, distribution of profits and payment of dividends);
- > The reinforcement of transparency (procedures reinforcing transparency, regulatory compliance system), auditing (internal and external audit, risk management), reporting obligations (shareholder communication, informing all interested parties).



**Pillars underpinning the Implementation of Corporate Governance within OTE**

For OTE, Corporate Governance translates into the overall principles upheld by the Company, which safeguard its performance and shareholders' interests, as well as those of all Stakeholders. Recognising the importance of Corporate Governance, OTE's relevant policy is fully aligned with international standards and has been formulated taking the following into consideration:

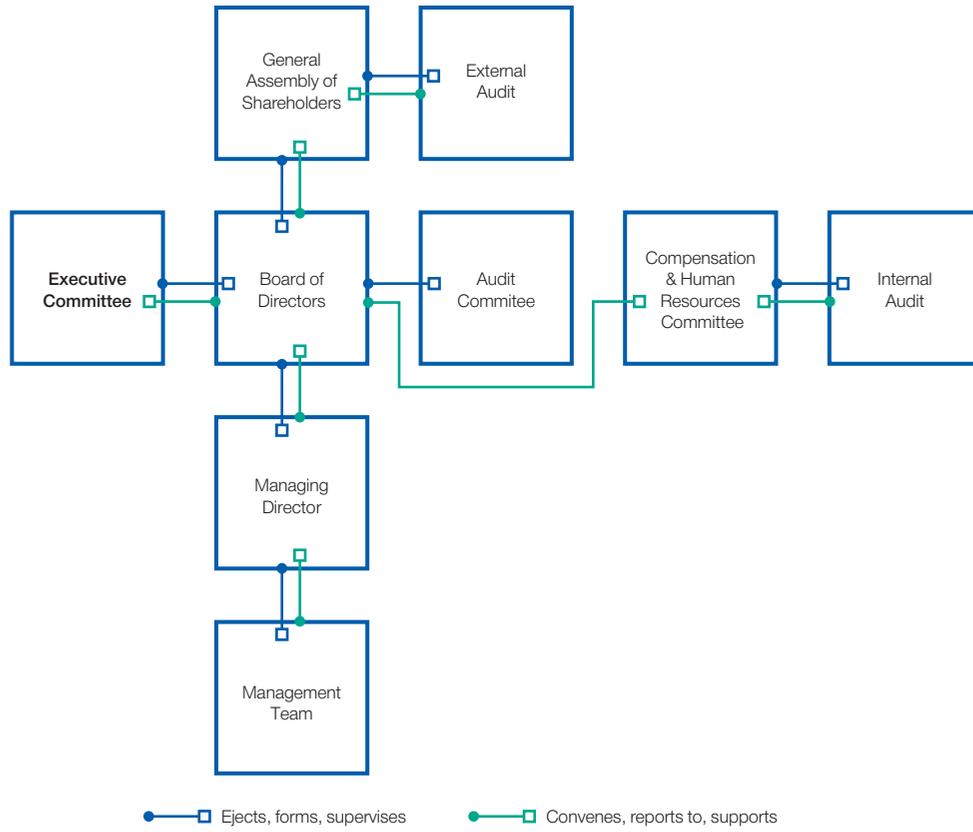
- > Management Bodies (Board of Directors, Chief Executive Officer and General Shareholders' Meeting);
- > The Audit Committee, which assists the Board of Directors (BoD) in the exercise of its supervisory duties, in drafting financial reports and in conducting internal audits;
- > The Compliance Management System (CMS), encompassing its legal and internal regulations and which was set up in July 2009;
- > The Audit Procedures, which ensure the Company's credibility and which avert the occurrence of fraud (such as the Code of Ethics and Business Conduct);
- > Whistle-blowing policy, which constitutes both a preventive measure aiming at preventing, as well as a means for detecting, fraud.

Law 3873/2010, which was enacted on September 2010, requires that all Greek listed companies disclose on annual basis information with regards to the corporate governance principles and the practices that they apply. The Law introduces the obligation for the drafting of a Corporate Governance Statement, which is included in the Annual Report of the Board of Directors and provides information on: the Corporate Governance Code.

Within the context of Law 3873/2010, OTE complies with the practices that the Corporate Governance Code of the Hellenic Federation of Enterprises (SEV) specifies.

*This code is available at: <http://www.sev.org.gr/online/index.aspx> and [http://www.sev.org.gr/Uploads/pdf/KED\\_TELIKO\\_JAN2011.pdf](http://www.sev.org.gr/Uploads/pdf/KED_TELIKO_JAN2011.pdf)*

OTE's Corporate Governance Statement is included in OTE's Annual Financial Report 2010, which is included in the company's Annual Report.



**The above pillars make up OTE's Corporate Governance System**

## **OTE REGULATORY COMPLIANCE COMMITTEE**

The OTE Regulatory Compliance Committee was set up in 2010, with the primary aim of providing "support, verifying and ensuring the implementation of Regulatory Compliance Policies, in the framework of the Regulatory Compliance Management System Programme." Seven (7) sessions of the Committee were held during 2010. Furthermore, the OTE Group Sub-Division of Regulatory Compliance Management was set up, manned and began operating. Its competencies are directly conferred by the Chief Executive Officer.

The OTE Group Compliance Management Process Manual has been published, further to its approval by the OTE Regulatory Compliance Committee, on 12 July 2010.

In the framework of monitoring the effectiveness of the Regulatory Compliance System of OTE, COSMOTE and Romtelecom, a CMS Certification was conducted in 2010 by the independent audit company with highly positive results for all three companies. OTE Group Compliance Management System consists of the following:

- > The Code of Conduct for the Protection of the Individual's Right to Privacy in the Handling of Personal Data within OTE Group
- > The OTE Group Whistle blowing Policy
- > The OTE Group Policy on Acceptance and Offering of Corporate Gifts
- > The OTE Group Donations and Sponsorships Policy
- > The OTE Group Events Policy
- > The OTE Group Fraud Policy
- > The OTE Group Policy on Insider Trading.

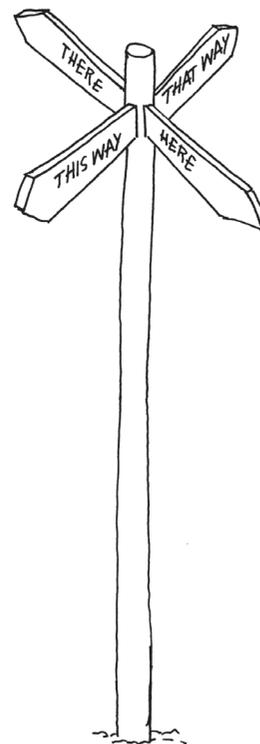
In order to identify and address incidences of corruption within OTE, all requisite measures, both preventive as well as suppressive, are adopted.

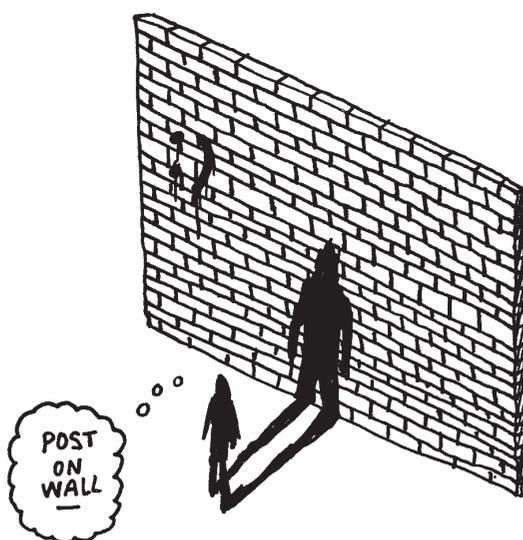
Specifically:

- > Adoption and implementation of regulatory compliance policies in regard to issues pertaining to OTE's BoD adoption and implementation of the 'Policy on averting conflicts of interest and combating corruption'.
- > Training personnel, especially those who come into contact with officials (of the public sector or otherwise) and who negotiate with clients or vendors.
- > Conducting an annual risk assessment, including on corruption issues, in view of the adoption and implementation by Management, if deemed necessary, of measures for curtailing incidences of corruption.
- > Ask me' procedure: Procedure involving the submission of questions by employees regarding the regulations and policies they must apply in the context of exercising their work duties, in order not to violate the relevant laws and procedures and to avert the risks entailed by such violations.
- > Tell me' procedure: Manages and addresses complaints concerning the infringement of applicable legislation, or of Company/Group Policies and Internal Procedures.

In 2010 there were 4 cases of proven non compliance which had as a result: 1 temporary seize of work, 1 freeze of wage, 1 transfer to another department and 1 reproof.

*For further and more detailed information on the subject of Corporate Governance, please visit: <http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/apologismosetairikisdiak>*





# CORPORATE RESPONSIBILITY & BUSINESS STRATEGY

For over half a century, Corporate Responsibility (CR) has been a key part of OTE's culture, with a particular emphasis on accompanying our market presence with societal awareness and contributions. Today the values of Corporate Responsibility constitute a strategic component of OTE's business strategy, planning, policies and operations.

Through its "Building Ties" CR program, introduced in 2005, OTE focuses on the marketplace, workplace, society and environment issues that are important to the company's success and to its stakeholders, in close alignment with European and international CR standards. We aim to demonstrate OTE's presence as a "responsible citizen" every day and create a sustainable business with increased competitiveness.

Once again in 2010, OTE's Corporate Responsibility priorities focused on the four "Building Ties" pillars with the following priorities that are based on the most important issues for our business and stakeholders during very difficult times in Greece:

> Marketplace: Utilisation and further development of technological infrastructures and possibilities emphasis on providing competitive and high quality services to meet customers' needs within the new framework of market convergence, thus contributing to the development of broadband services and

investing systematically in bridging the digital gap and internet safety.

- > Employees: Adoption of policies and practices that encourage personal development and recognise good performance; ensuring equality of opportunities in the working environment and promoting cooperation and implementing ward programs to further enhance working conditions.
- > Environment: Development of actions and initiatives, in the framework of regulations and company policies, using qualitative and measurable quantitative targets, to minimise the ecological footprint of the company, through the limitation of energy consumption, the recycling of materials and the support of environmental Non Governmental Organisations.
- > Society: Continuation and expansion actions and initiatives that contribute to the preservation and protection of social cohesion through support for vulnerable social

groups, digital inclusion, cultural heritage preservation and promotion of employee volunteerism; with particular focus on the regions.

Each of these pillars of OTE's Corporate Responsibility Program is covered in a section of the 2010 Report. As shown in the table "Goals-Results-Commitments", in 2010 we met almost all our CR goals set the previous year, by staying focused on sustaining our programmes in difficult times and making incremental progress.

# CR CERTIFICATIONS AND INDICES

OTE's CR strategy, initiatives and reporting are aligned closely with a number of European and International standards.

## CERTIFICATIONS

- > In 2010, the number of OTESHOPs (TEK) that are certified according to the ISO 9001: 2008 standard, was 127 throughout Greece (from a total 202), with an additional 15 Administrative Departments also certified.
- > Improvement of Environmental Management Systems, according to ISO 14001:2004 Standard, was achieved for two departments: Department of Maintenance and Repairs of the Transportation Means Unit and the Customer Technical Support Department.
- > Improvement of Occupational Health and Safety Management Systems, according to ELOT 1801:2008 - OHSAS 18001: 2007 Standard, was achieved for two departments: Department of Maintenance and Repairs of the Transportation Means Unit and

the Customer Technical Support Department

The above certification processes ensure the provision of quality services, which undergo continuous re-assessment and improvement.

## GLOBAL REPORTING INITIATIVE (GRI)

OTE was one of the first Greek companies to apply GRI's G3 principles (Global Reporting Initiative 'G3' Sustainability Reporting Guidelines). In 2010 we have again applied the 'G3 Guidelines of the Global Reporting Initiative (GRI), including the GRI 'G3.1' guidelines regarding diversity and human rights for the indicators on which we report.

## EXTERNAL ASSURANCE

In 2010, OTE's 2009 CR Report was also among the first Greek companies to be independently externally assured, pursuant to the AA1000 Accountability Principles Standard, thus achieving the GRI «B+» application level.

### *AA1000 AccountAbility Principles Standard*

OTE's CR program "Building Ties", focuses on issues that are of great importance for both our business and our stakeholders. In 2010, OTE continued to develop its approach to applying the AA1000 principles pertaining to Inclusivity, Importance and Responsiveness. From the stakeholder feedback received during

2010 and in preparing this Report, we are confident that our programs address our stakeholders' main priorities, while acknowledging the need for further development of systems to support our efforts to determine and evaluate emerging or changing issues.

### *Inclusivity*

Our approach regarding "Inclusivity" (the determination of stakeholders and cooperation with them in order to gain a thorough understanding of the issues that concern them) has been largely developed by the establishment of dialogue mechanisms with the employees, the investors, the customers, the public and regulatory bodies, NGOs and the media. We are aware of the need and the value of a two-way communication channel for the discussion of emerging issues, as this helps to develop an informed overview on issues of Stakeholders' concern, which helps us plan and form future decisions. So far, most Stakeholders are satisfied with the level and modes of dialogue with OTE.

In 2010, at the request of our NGO social partners for the establishment of a direct dialogue with the company, we began a series of organised discussions to promote the exchange of views on issues concerning both OTE and the social partners. These discussions continued into 2011, as part of fulfilling our 2010 CR goals. These dialogue meetings focus on the most important social and environmental issues in Greek society, an exchange of views on those issues from the NGO's and corporate perspectives, as well as on each other's roles and where cooperation is best directed. The most crucial issues identified by Social NGOs were:

- > The negative impact of the current economic crisis on children and families, resulting in decreased protection and greater risk of harm.
- > The increasing role of technology in

people's lives, particularly for young people, which can be very beneficial with the right education and harmful when it is lacking.

- > Extremely low levels of social welfare, due to low levels of public awareness and the lack of organized state welfare for vulnerable social groups, particularly people with disabilities and serious illnesses.

The Environmental NGO's identified as most crucial the following:

- > Despite the economic crisis, the issue of the environment is now considered as the second most crucial social issue in our society. This is because environmental problems have started affecting directly the everyday life of people especially those of low income. As a result support for voices calling for action has grown.
- > The lack of state policies and action in this area has left an immense space for initiatives and collaborative actions by NGOs, private citizens, corporations and individual politicians. The lack of protection of the environment has also led to a high threat for biodiversity.

Finally, the most important views of the NGO's on the corporate world, CR, and the role of OTE, summarize as follows:

- > The lack of organized state policies and measures on these issues has left a large space for corporate

- involvement and as a result expectations on companies have grown.
- > Companies have responded to this by taking action and developing CR programmes, but not always in the right way. Phenomena such as 'green-washing' or undertaking actions without incorporating the underlying values in their business and corporate culture, or without following through, are often observed in the corporate world.
  - > These NGOs welcome strategic and long term partnerships with companies and expect not only financial support from them, but also evidence that the company is incorporating the values of CR in their business structure and promoting these with their people.
  - > During the current economic crisis when direct financial support from companies is decreasing, NGOs encourage companies to keep their long term relations with NGOs with a proven track record and to explore alternative and creative ways of using corporate resources to support them. Corporate volunteerism, is one such method, and is very welcomed as long as it is well organized and supported by both sides and it is followed through.
  - > NGOs are also encouraging companies to find ways of using their core

business resources, products and services (for example, technology in the case of OTE), to help social groups and to protect the environment. Green ICT is seen as a very positive contribution in the right direction.

#### *Materiality*

Our approach to "Materiality" (determining what issues are important for OTE and its stakeholders) focuses on the impact that our company has on the marketplace and the environment, as well as on the support we provide to the society and the employees. In 2010 we began to develop a materiality mapping system, the implementation of which was delayed by some internal reorganisation, and will now be pursued in 2011. Our aim is to further map and prioritise the issues that combine a high degree of impact for our enterprise and a high degree of importance for the stakeholders, as well as to expand our measurement capabilities and reporting of those issues. The dialogue we have started with NGOs gave us valuable input on what is material for them. However, we acknowledge the need for a more complete systemisation of the materiality procedure during 2011.

#### *Responsiveness*

Our approach towards "Responsiveness" (to material issues and to being transparent regarding our performance) is well developed in individual domains, such as our customers, our investors and the employees and is increasingly becoming embedded in the environmental management. Our approach regarding issues that are material for multiple stakeholder domains, such as Internet Safety, were developed for the most part in 2010, thus proving the importance of Corporate Responsibility and its more systematic integration in the company's business planning.

For the 2010 CR Report, Deloitte has committed to provide independent assurance regarding the implementation of the Accountability AA1000 principles in the “2010 Corporate Responsibility Report”.

## **INTERNATIONAL CR INDICES**

### *FTSE4Good*

OTE, for the last three consecutive years (since 2008) is included in the FTSE4Good index on issues pertaining to Corporate Responsibility, guaranteeing transparency and continuous effort for the implementation of good practices. The FTSE4Good index measures Corporate Responsibility performance and includes top companies from all over the world.

### *Corporate Responsibility Index (CRI)*

In 2010, for a third consecutive year, OTE participated in the Corporate Responsibility Index (CRI) evaluation procedure, in cooperation with BITC (Business in the Community), and for the first time received the "gold" distinction, among many other significant Greek companies and multinational enterprises. The CRI index is an evaluation tool and is considered as one of the most important international indices in Europe for the measurement of the performance of the companies regarding Corporate Responsibility.

# CORPORATE RESPONSIBILITY & OTE MANAGEMENT

The principles and values of Corporate Responsibility constitute a strategic choice by OTE and are included in the objectives of the Company's 3-year (2010-2012) Business Plan. Furthermore, the strengthening of the value of the dialogue with stakeholders, as well as OTE's approach regarding risk management, always in relation to precautionary principles and the need for securing sustainability, are now considered as primary objectives of the company.

Corporate Responsibility, and its implementation according to our values and commitments, is of great importance to the Management of OTE.

The briefing of OTE's Management regarding Corporate Responsibility practices is equally important and is achieved through:

- > The submission of regular reports on the progress of Corporate Responsibility actions and initiatives to the Management Council (at a General Directors level) by the Corporate Communications Director, who, according to the organisational structure, reports directly to the Chairman and CEO.
- > The annual presentation of the Corporate Responsibility actions to the Board of Directors of OTE, by the

Chairman and CEO.

- > The distribution of the "Annual Corporate Responsibility Report" to the members of the BoD and the shareholders of the company, at the Annual Ordinary General Meeting.

## CORPORATE RESPONSIBILITY TEAM

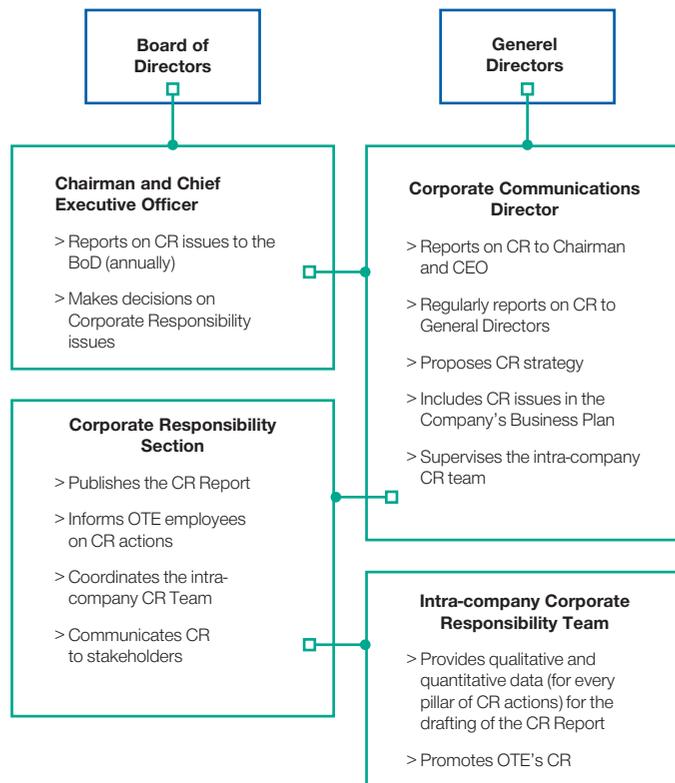
OTE, in recognition of the importance of a systematic and responsible attitude towards society, formed an intra-company Corporate Responsibility team in 2006, under the coordination and guidance of the Corporate Communication Directorate. The intra-company group consists of representatives from all General Directorates, as well as of representatives from the 3 Telecommunications Regions, while the project has been included in the organisational structure of the company.

In 2010, the intra-company Social Responsibility team was broadened, so as to include new members, in order to facilitate the collection of new data pertaining to environmental issues. The team's contribution is very important, among other reasons, for the collection and organisation of the material for the preparation of the Annual Corporate Responsibility Report.

## CORPORATE RESPONSIBILITY SECTION

During 2010, the external assurance obtained for the data included in the “2009 Corporate Responsibility Report” was perhaps the most important challenge that the Corporate Responsibility Department was faced with, and it resulted in the 2009 Report being assured to the "B+" application level according to GRI's G3 principles.

The following chart shows OTE's Corporate Responsibility governance system:



# PARTICIPATIONS - DISTINCTIONS

## PARTICIPATIONS

We make sure that as a company we receive, at all times, continuing and multilateral information regarding the developments on Corporate Responsibility issues. In 2010, OTE maintained its participation as a member in various national and international bodies.

<i>Body</i>	<i>Capacity</i>
<i>Greek Network for Corporate Social Responsibility</i>	<i>Member</i>
<i>Global Reporting Initiative</i>	<i>Member (organizational stakeholder member)</i>
<i>Global Compact</i>	<i>Member</i>
<i>ETNO (Sustainability Working Group)</i>	<i>Member</i>
<i>The Federation of Hellenic Enterprises (SEV) council for sustainable development</i>	<i>Member</i>
<i>GeSI (Global e-Sustainability Initiative)</i>	<i>Member</i>
<i>Corporate Responsibility Institute</i>	<i>Member</i>

## DISTINCTIONS

In 2010, OTE received several distinctions for its CR actions, commitments and practices. The following are referred indicatively:

<i>Body</i>	<i>OTE's distinctions</i>
<i>"C.R. Index 2010"</i>	<i>"Gold" level distinction of the C.R. Index, the highest distinction in Greece</i>
<i>International magazine World Finance.</i>	<i>Award for best company in the Corporate Governance category in Greece</i>
<i>Capital Link Company</i>	<i>Awards in two categories in the framework of the institution of "Annual Investment Relations Awards"</i>
<i>University of the Aegean</i>	<i>Award for the 2009 Report regarding the correct implementation of the principles of GRI in the framework of "CSR Reporting Forum 2010"</i>

*Body*

*OTE's distinctions*

<p><i>“CEO &amp; CSR Money Conference 2010”</i></p>	<p><i>Award as the best company throughout the years in the category of Corporate Responsibility and 2nd award in the category “Best CSR Report”</i></p>
<p><i>CRD Analytics</i></p>	<p><i>OTE is included in the top 1000 socially responsible companies list, according to an international survey based on the GRI indices (5th in relation to the 10 Greek enterprises and 407th at a global level)</i></p>

# GOALS RESULTS COMMITMENTS

<i>General</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
<p><i>Corporate Responsibility (CR) in the Business Plan</i></p>	<ul style="list-style-type: none"> <li>▪ <i>To discuss with General Directors and reach final agreement on incorporating CR goals and KPIs in Business Plan</i></li> <li>▪ <i>To align with Deutsche Telekom's KPI's where possible</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Inclusion of further CR issues in the Business Plan.</i></li> <li>▪ <i>Coordination with Deutsche Telekom on Group KPIs and initial development of OTE CR KPIs.</i></li> <li>▪ <i>Development of OTE KPI's regarding CR issues</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Coordination with all General Departments on further integration of CR KPIs with Business Plan</i></li> <li>▪ <i>Continue alignment with Deutsche Telekom Group KPIs</i></li> </ul>
<p><i>CR and Management</i></p>	<p><i>To develop a systematic approach to engaging with the Board of Directors on CR matters (quarterly or biannually).</i></p>	<ul style="list-style-type: none"> <li>▪ <i>Board Responsibility for CR was assigned to the CEO</i></li> <li>▪ <i>Planned "Crisis Management System", comprising a "Crisis Management Team"</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Develop systematic reporting on CR issues to the Board of Directors (on a quarterly or bi-annual basis)</i></li> <li>▪ <i>Implement the "Crisis Management System", in all of OTE's operations</i></li> </ul>
<p><i>Stakeholder Dialogue</i></p>	<ul style="list-style-type: none"> <li>▪ <i>To hold organised discussions with selected stakeholders, such as meetings with employees to discuss vital issues</i></li> <li>▪ <i>To arrange meetings with NGO's to discuss</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Continued CR surveys of existing stakeholders (Investors, NGOs, Employees) and expanded communication to include Media</i></li> <li>▪ <i>Recorded the main issues of concern to them, in the Stakeholders table</i></li> </ul>	<p><i>Creation and organisation of a Consultative Body for mediating communication between employees and Management (direct meetings with employees to discuss</i></p>

<i>General</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
	<i>matters of concern (eg: Internet Safety)</i>	<i>of the 2009 CR Report</i> <ul style="list-style-type: none"> <li>▪ <i>Organised meetings with NGOs to discuss issues and proposals of general interest, on the subject of CR</i></li> </ul>	<i>important issues, etc)</i>
<i>CR Certifications</i>	<ul style="list-style-type: none"> <li>▪ <i>To obtain GRI B+ for the 2009 CR Report</i></li> <li>▪ <i>To maintain FTSE4Good listing for 2010</i></li> <li>▪ <i>To maintain and further improve CR performance in line with international standards</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Achieved a GRI B+ grade for the 2009 CR Report</i></li> <li>▪ <i>Maintained our listing in the FTSE4Good index</i></li> <li>▪ <i>External certification of 2009 CR Report</i></li> <li>▪ <i>Received the «Gold» award from the CR Index</i></li> <li>▪ <i>Participation in the Carbon Disclosure Project</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Maintain GRI certification at B+ for the 2010 Report</i></li> <li>▪ <i>Maintain our listing in the FTSE4Good index for 2011</i></li> <li>▪ <i>Maintain our participation in the Carbon Disclosure Project</i></li> <li>▪ <i>Maintain and further improve our performance in the CR sector, in accordance with international standards</i></li> <li>▪ <i>Participation in the Dow Jones Sustainability Index</i></li> </ul>

<i>Marketplace</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
<i>Broadband Development</i>	<i>To increase OTE broadband services, speed and networks to more than the 94% of the country's territory (infrastructure coverage which gives the opportunity to have access to Broadband connection).</i>	<ul style="list-style-type: none"> <li>▪ <i>Increased broadband penetration to 20.28% of the population</i></li> <li>▪ <i>Increased Broadband penetration among OTE customers to 30.89%.</i></li> <li>▪ <i>We provided broadband services at high speeds to the vast majority of the country (95% of telephone connections)</i></li> <li>▪ <i>Pilot operation of</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Continue to increase availability of broadband services and speeds</i></li> <li>▪ <i>Provide a satellite broadband Internet service</i></li> <li>▪ <i>Launch commercial operation of VDSL2</i></li> </ul>

<i>Marketplace</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
		<p><i>VDSL2 (50Mbps/per subscriber)</i></p> <ul style="list-style-type: none"> <li>▪ <i>Provided 55 computers and other equipment to different organisations performing social work, in Athens and the periphery</i></li> </ul>	
<i>Products and Services</i>	<ul style="list-style-type: none"> <li>▪ <i>To expand Conn-x TV programmes and channels</i></li> <li>▪ <i>To continue and increase services and products for special social groups</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Developed IPTV services, with 460 points of presence of OTE's network throughout Greece</i></li> <li>▪ <i>Enriched Conn-x TV programmes and channels</i></li> <li>▪ <i>Continued to offer free broadband connections to excellent students, with the purpose of disseminating new technologies among younger generations</i></li> <li>▪ <i>Continued and expanded the provision of services and products to special social groups</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Commercial operation of satellite television service</i></li> <li>▪ <i>Continue providing existing products and services to special population groups and students</i></li> </ul>
<i>Internet Safety</i>	<ul style="list-style-type: none"> <li>▪ <i>To expand existing synergies (eg. teenage helpline "Ypostirizo")</i></li> <li>▪ <i>To select and partner with an active organisation in order to support/produce brochure targeted to parents, teachers, children and teenagers</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>We created a special brochure titled 'Safely surf the Internet' that contains simple advice on the proper and safe use of the Internet (provided with every purchase made through the OTE Network of Stores, throughout Greece)</i></li> <li>▪ <i>Cooperation with the Adolescent Health</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Continue our current cooperation with the Adolescent Health Unit</i></li> <li>▪ <i>Continue sponsoring the youth helpline "Ypostirizo: 800 11 800 15"</i></li> <li>▪ <i>Implementation of the 'Safe Internet' information campaign both in Athens as well as the Periphery.</i></li> </ul>

<i>Marketplace</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
		<p><i>Unit (AHU) of the 2nd Paediatric Clinic of Athens University, Children's Hospital 'P. &amp; A. Kyriakou', in order to support the 'Internet Safety' awareness-raising campaign targeting pupils, parents and educators and that is being implemented throughout Greece.</i></p> <ul style="list-style-type: none"><li><i>▪ In cooperation with the Adolescent Health Unit, we planned a programme of briefing sessions on issues pertaining to 'Internet Safety'</i></li></ul> <ol style="list-style-type: none"><li><i>1. At OTE's Telecommunications Museum for primary and secondary school pupils and adults</i></li><li><i>2. Throughout Greece for employees and the general public</i></li></ol> <ul style="list-style-type: none"><li><i>▪ Provided computer protection from viruses, hackers &amp; spam, by offering Conn-x Online protection free of charge for the first two months, with every Conn-x purchase</i></li><li><i>▪ We continued our co-operation with the Greek Self-Regulatory Body <a href="http://www.safenet.gr">www.safenet.gr</a> as well as the Greek Safe Internet Site <a href="http://www.saferinternet.gr">www.saferinternet.gr</a></i></li></ul>	

<i>Marketplace</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
		<ul style="list-style-type: none"> <li>▪ We provided useful advice on safety issues through OTENET's site for customers (<a href="http://www.otenet.gr/hd/">http://www.otenet.gr/hd/</a>) and the 'Abuse' website went online that provides safe navigation information (spam, mail bombing, hacking, port scanning, etc)</li> </ul>	
<i>Procurement Policy</i>	<i>Next steps to be decided in 2010 Business Plan.</i>	<ul style="list-style-type: none"> <li>▪ Continued implementation of the Procurement Policy introduced in 2009</li> <li>▪ More effective management of suppliers and improved procedures for monitoring and assessing their performance.</li> <li>▪ Capacity of entering into DT Frame Agreements and capacity of participating in international tenders of the DT Group</li> </ul>	<i>Consideration of pilot social and environmental audits.</i>

<i>Employees</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
<i>Employee satisfaction and training</i>	<ul style="list-style-type: none"> <li>▪ To design and implement e-learning sessions for employees, on various issues, such as matters of compliance</li> <li>▪ To continue the employees satisfaction survey</li> </ul>	<ul style="list-style-type: none"> <li>▪ We successfully completed the employee e-learning training programme on regulatory compliance</li> <li>▪ Pilot operation of new HR Help Desk, to cover employee needs &amp; questions (payroll, pension, compensation,</li> </ul>	<ul style="list-style-type: none"> <li>▪ Full expansion and operation of the HR HelpDesk service</li> <li>▪ Potential integration of employee survey into a broader Deutsche Telekom Group survey</li> <li>▪ Development of HCM (Human Capital Management)</li> </ul>

<i>Employees</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
		health and safety issues etc)	information system – option for employee self-service procedures (e.g. work leaves)
<i>Internal Communication</i>	<ul style="list-style-type: none"> <li>▪ Maximise the dialogue with employees via the Intranet (U-Link) and exchange views regarding CR practices.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 93 publications were issued on CR issues (40% more than 2009)</li> <li>▪ Surveys were carried out, with the participation of employees, aiming at achieving greater employee involvement in internal communication issues (Intranet user satisfaction survey, CR survey through U-link, satisfaction survey for OTEch@t magazine, providing comment forms regarding various other internal communication actions</li> </ul>	<ul style="list-style-type: none"> <li>▪ Further boost the use of the Intranet (U-link) for internal communication purposes and to disseminate information on CR issues</li> <li>▪ Boost two-way communication channels with employees (carry out surveys, questionnaires, etc)</li> </ul>

<i>Society</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
<i>Corporate Volunteerism Programmes</i>	Continue volunteerism programmes implemented by OTE and assess the first results and level of participation of the new “Corporate Volunteering Programme”	<ul style="list-style-type: none"> <li>▪ We boosted the overall ‘OTE Employee Volunteerism Programme’ by: <ol style="list-style-type: none"> <li>1. Creating the ‘ATHENS 2011 OTE Volunteerism Team’, in the framework of the Company’s sponsorship of the ‘ATHENS 2011 Special Olympics World Games’</li> <li>2. Organising an event, with the participation of employees and their families, in cooperation with NGO ‘ANIMA’</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Continue the OTE Employee Volunteer Blood Donation programme</li> <li>▪ Boost the ‘OTE Employee Volunteerism Programme’</li> </ul>

<i>Society</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
		<ul style="list-style-type: none"> <li>▪ We achieved increased blood donations during the OTE Employee Volunteer Blood Donation</li> <li>▪ OTE Employee Cultural Centres organised local actions for the environment, on the occasion of 'World Environment Day,' with the participation of employees and their families</li> </ul>	
<i>OTE's CR Website</i>	<ul style="list-style-type: none"> <li>▪ Inform all stakeholders on the Company's Corporate Responsibility actions</li> <li>▪ Create a micro-site, within corporate website (<a href="http://www.ote.gr/cr2009">www.ote.gr/cr2009</a>) dedicated to OTE's CR activities, aiming at improving information provision to the public.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The special micro-site (<a href="http://www.ote.gr/cr2009">www.ote.gr/cr2009</a>) went online for the first time for the 2010 CR Report, within OTE's official website</li> <li>▪ We started re-designing the company's official website <a href="http://www.ote.gr">www.ote.gr</a></li> </ul>	<ul style="list-style-type: none"> <li>▪ Modify how the Corporate Responsibility actions are displayed in the framework of re-designing OTE's official website</li> <li>▪ Capability of online reporting</li> </ul>

<i>Environment</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
<i>Ecological Footprint</i>	<i>Further expansion of the detailed recording of the nationwide ecological footprint.</i>	<i>Documentation of the ecological footprint of the selected buildings in Attica and Telec. Region of Northern Greece and expansion of footprint calculations to include Telec. Region of Southern and Western Greece.</i>	<ul style="list-style-type: none"> <li>▪ Further expansion of the detailed recording of the ecological footprint to include the Telec. Region of Islands.</li> <li>▪ Disaggregating of the calculated footprint to specific end-uses.</li> </ul>
<i>Materials and waste management</i>	<ul style="list-style-type: none"> <li>▪ To expand the scope of recycling programs</li> </ul>	<ul style="list-style-type: none"> <li>▪ Nationwide expansion of the contract with the</li> </ul>	<i>To expand the scope of paper recycling</i>

<i>Environment</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
	<p>nationwide.</p> <ul style="list-style-type: none"> <li>▪ To sign the ECOELASTIKA contract for the alternative management of the used tires of our vehicles</li> </ul>	<p>company “Appliances Recycling S.A.”</p> <ul style="list-style-type: none"> <li>▪ Signature of a nationwide contract with the company “ECOELASTIKA S.A.”</li> <li>▪ 14% reduction of paper consumption</li> <li>▪ The “PAPIROS” information system (for the e-management of paperwork) became fully operational</li> </ul>	<p>programmes nationwide.</p>
<i>Renewable Energy Sources (RES)</i>	<p>To promote the further use of RES.</p>	<p>Completion of a preliminary study on the possibilities for wind energy exploitation.</p>	<ul style="list-style-type: none"> <li>▪ The assessment of potential roof-top PV projects, the authorization and finally the installation of these projects (total capacity of 200 kW) in buildings in Attica and/ or other areas where no grid restrictions apply.</li> <li>▪ The assessment of wind energy potential in sites where telecommunication equipment was or is installed</li> </ul>
<i>Energy conservation in buildings</i>	<ul style="list-style-type: none"> <li>▪ Continue installing:               <ul style="list-style-type: none"> <li>(a) VRV systems,</li> <li>(b) Free cooling systems and</li> <li>(c) low energy consumption bulbs.</li> </ul> </li> <li>▪ To use natural gas in more than 6 buildings in Attica.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Finalization of a preliminary study for the investigation of potential improvements in the efficiency of energy use in buildings A building of a total area of 16,000 m<sup>2</sup>, incorporating energy conservation techniques has been constructed in</li> </ul>	<ul style="list-style-type: none"> <li>▪ Pilot project of energy saving measures, through Energy Service Companies (ESCOs), in three buildings in Attica</li> <li>▪ The connection of 6 buildings in Attica to the natural gas network.</li> <li>▪ Continue installing:               <ul style="list-style-type: none"> <li>(a) VRV systems,</li> <li>(b)</li> </ul> </li> </ul>

<i>Environment</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
	<ul style="list-style-type: none"> <li>▪ Continue the installation of low energy consumption bulbs</li> </ul>	<p><i>Patras</i></p> <ul style="list-style-type: none"> <li>▪ All necessary studies for the connection of specific OTE buildings in Attica to the natural gas transmission network have been finalized</li> </ul>	<p>Free cooling systems and (c) low energy consumption bulbs</p>
<i>Building Management System (BMS)</i>	<p>Completion of BMS installation at OTE's Administration Building</p>	<p>The installation of BMS in OTE's Administration Building is completed and studies for BMS installation in 2 other buildings of Attica have been finalised.</p>	<p>BMS installation in the other 2 buildings of Attica.</p>
<i>Environmental Management System (EMS)</i>	<p>To design and develop a centralized EMS</p>	<p>Certification of management systems for 2010.</p>	<p>Start up of the design and development process for a centralized Environmental Management System for OTE.</p>
<i>Environmental data collecting system</i>	<p>Evaluation of the Credit 360 Data Collecting System and design of an intra-company environmental data collection and archiving system, if necessary.</p>	<p>Use of the Credit 360 Data Collecting System for additional OTE KPIs and reporting needs.</p>	<p>Design and pilot operation of a system for environmental data collection and creation of related reports (reporting system)</p>
<i>Reduction of road transportation activity</i>	<p>In the context of the Workforce Management project of SPP (WFM), development of:</p> <ul style="list-style-type: none"> <li>▪ a system to resolve a greater level of customer-related technical issues on the remotely, avoiding</li> </ul>	<ul style="list-style-type: none"> <li>▪ Remote testing tools already installed in all Call Centers and in use</li> <li>▪ Specifications for system fully developed</li> </ul>	<ul style="list-style-type: none"> <li>▪ Further develop diagnostic capabilities to achieve even higher remote resolution rates</li> <li>▪ Pilot application of platform to first field units by end of year, in view of full launch in 2012</li> </ul>

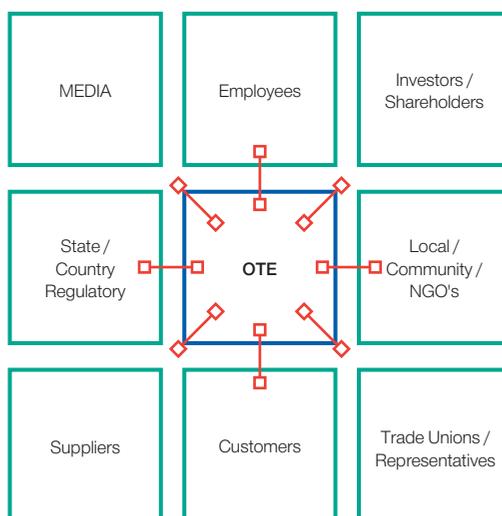
<i>Environment</i>	<i>Goals for 2010</i>	<i>Achievements for 2010</i>	<i>Commitments for 2011</i>
	<i>corresponding visits</i> <ul style="list-style-type: none"><li>▪ <i>an intelligent, real-time routing system</i></li></ul> <i>reducing distance traveled.</i>		

# STAKEHOLDER ENGAGEMENT

OTE considers that the cultivation of a systematic stakeholder dialogue in line with the principles of the “AA 1000 AccountAbility Principles Standard” is very important. The company, records the most important issues identified by the various stakeholders (customers, providers, NGO’s, media, ect), ensuring that they are addressed. The various stakeholders are identified through the assessment of the telecommunications environment and the parameters that define it each time. OTE readjusts its practices with flexibility, by adopting mechanisms of systematic or ad hoc contacts and enriching the list depending on current facts and developments.

To read about the main issues raised through the dialogue with the stakeholders you can see the “Stakeholder engagement table” and the “Corporate Responsibility Survey”, by visiting: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en). The evaluation of the findings from the annual Survey provides feedback for “Building Ties” with stakeholders and for further development of the constructive dialogue in the following years.

The following chart depicts the most important stakeholders for OTE:



**Stakeholder Map**

# NATIONAL & INTERNATIONAL CO-OPERATIONS

## RESEARCH PROGRAMS

Part of OTE's strategy consists in the active participation regarding the elaboration – implementation of contemporary European and national research programs, which promote technological applications in the electronic communications sectors, according to the needs and the requests of the European communities and economy. In 2010, OTE participated in 5 European Community Research Programs, as well as in National Research Programs, while it participated in 7 Conferences and Workshops, such as:

- > Self-NET (“Self-Management of Cognitive Future InterNET Elements”)
- > FUTON (“Fibre Optic Networks for Distributed, Extendible Heterogeneous Radio Architectures and Service Provisioning”)
- > Participation in preparatory actions and submission of proposals for funded national research programs (Actions “SYNERGASIA” / ESPA from GGET)

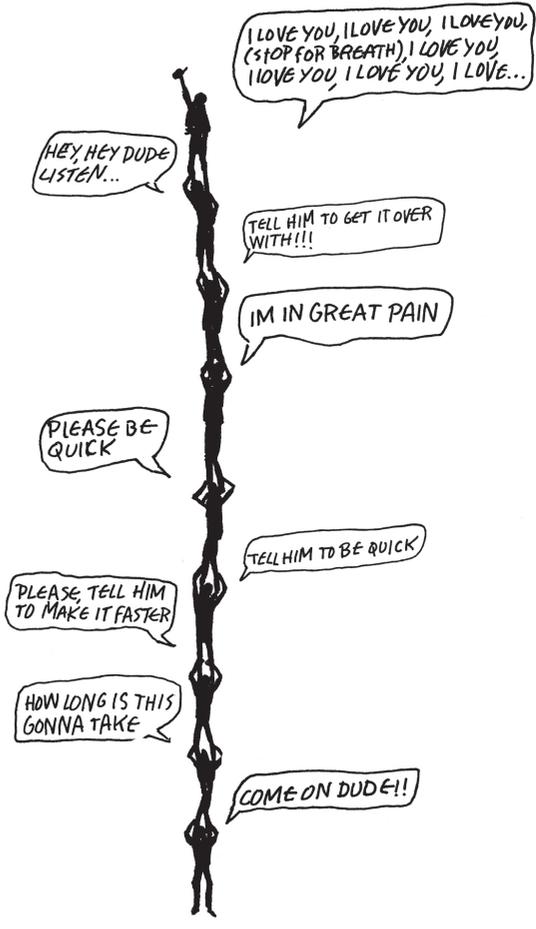
## PARTICIPATIONS IN ASSOCIATIONS – FORUM

OTE, in its capacity as member, makes an active contribution in European, as well as international Organizations, such as:

- > ETNO (European Telecommunications Network Operators' Association)
- > GeSI (Global e-Sustainability Initiative)
- > EU Standby Initiative
- > ITU (International Telecommunications Union)
- > ETSI (European Telecommunications Standards Institute)
- > ADSL FORUM
- > EURESCOM (European Institute for Research and Studies in Communications)

*For more information on OTE's participation in “Research Programs”, “Conferences and Workshops”, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*





# **BUILDING TIES WITH THE MARKETPLACE**

OTE focuses on optimising the operation of its infrastructure, as well as on offering quality services, which constitute basic tools used by its customers as part of their activities and in their daily life. Quality, transparency, responsibility and social awareness rank at the top of OTE's marketplace priorities on a daily basis.

OTE's Marketplace priorities entail:

- > The continuous improvement of customer satisfaction levels, by providing premium quality services and customer support;
- > The installation of active equipment (modem routers, Dslam, etc), both in outlying Regions as well as in Attica, in order to achieve higher connection speeds;
- > The development of a Next Generation Access (NGA) Network, with the aim of migrating to the new broadband networks faster and in a technically superior manner;
- > The continuous improvement of operational performance, the competitive efficiency of sales networks and customer service operations;
- > Proactively safeguarding and further

increasing its market share through the planning, implementation and commercial promotion of innovative and safe/reliable products, services and integrated solutions that combine network and information technologies.

## **DIRECT ECONOMIC CONTRIBUTION OF OTE AND ITS SUBSIDIARIES**

OTE's strong presence, which is not confined to Greece but also encompasses South-East Europe through its subsidiaries, also serves to boost the markets and economies of the countries where it operates, as well as contributing towards their modernisation and development, through the provision of innovative telecommunications products and services.

*Payments for OTE  
and subsidiaries*

*(amounts in Euro millions) 2009\* 2010*

<i>Salaries and benefits (Bonus)</i>	<i>1,244.2</i>	<i>1,167.1</i>
<i>Income taxes paid</i>	<i>382.4</i>	<i>238.9</i>
<i>International provider charges</i>	<i>184.0</i>	<i>190.3</i>
<i>Domestic provider charges</i>	<i>516.3</i>	<i>414.6</i>
<i>Telecommunications equipment cost</i>	<i>475.1</i>	<i>447.3</i>
<i>Fees &amp; commissions due to third parties</i>	<i>1,190.4</i>	<i>1144.8</i>
<i>Shareholder returns</i>	<i>410.9</i>	<i>39.6</i>

\* Adjusted due to change in accounting policy (Note 32 of Dec 31, 2010 OTE IFRS report)

## MAINTAINING COMPETITIVENESS

2010 was a difficult year for the Greek economy, but also for the economies of countries worldwide. OTE, always with the aim of maintaining the company's competitive edge, primarily focused on the following:

- > customer satisfaction
- > upgrading infrastructure
- > containing costs
- > optimising corporate gains
- > developing and mobilising its employees
- > equitable treatment by regulatory authorities

Further information is available in the 2009 Annual Report, at: <http://www.ote.gr/portal/page/portal/InvestorRelation/OTEIRMainPage> and Annual Report 2009. The aforementioned issues, including those of interest to local communities and regarding the ecological footprint, also cover the main questions posed by OTE Stakeholders.

# NEW TECHNOLOGIES AND BROADBAND

## NETWORK AND BROADBAND INFRASTRUCTURE

Recent years have witnessed the rapid expansion of broadband penetration in Greece, which continued apace in 2010. As a result, Greece is steadily improving its broadband ranking, gradually closing the gap with the European average.

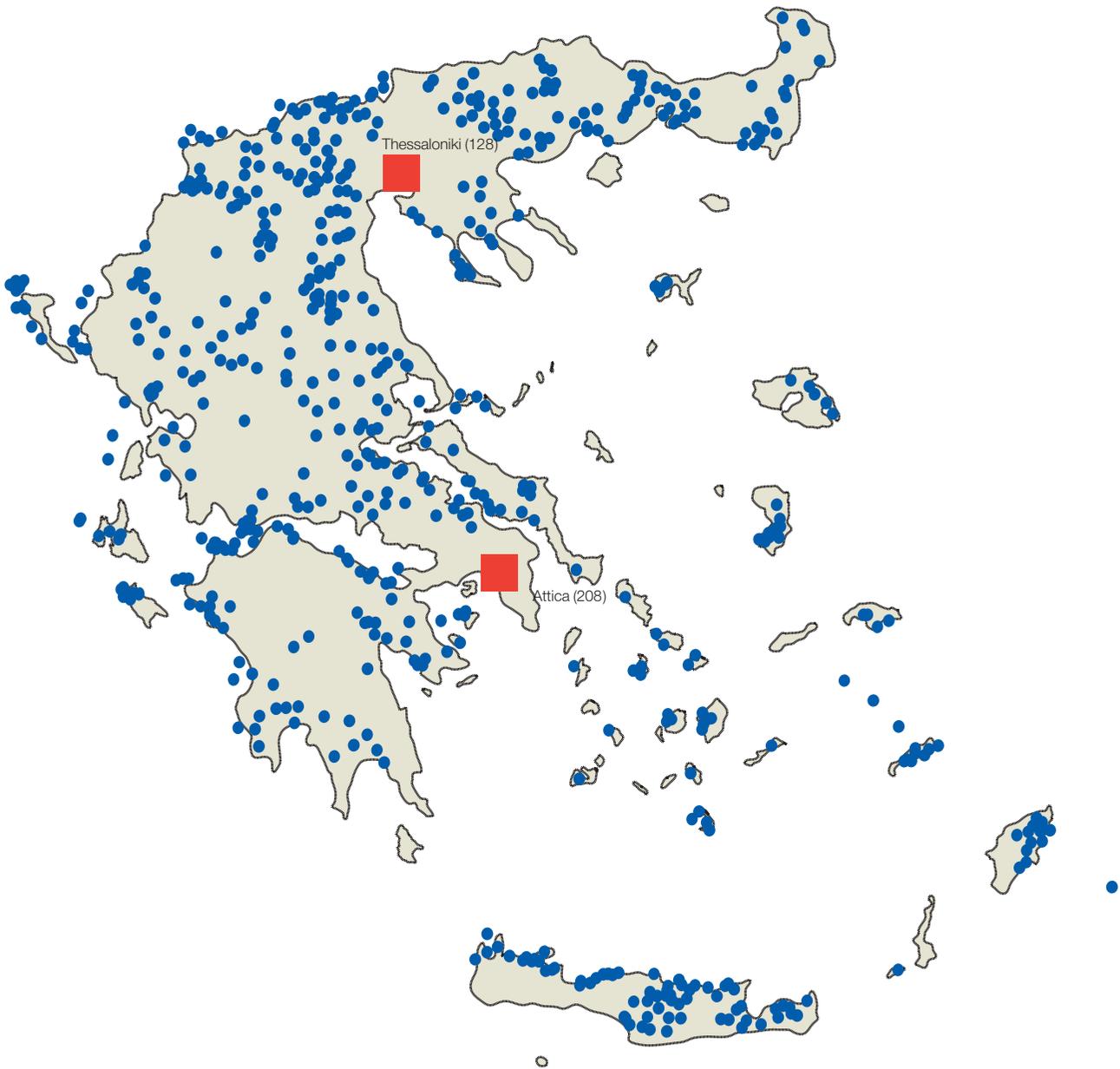
Since early 2010, broadband penetration in Greece has risen by 2.1 connections per 100 residents, and it is estimated that convergence with the rest of Europe will continue, as this upward trend is anticipated to be significantly higher than the European average. Those benefiting from this growth are citizens, companies and the Greek economy in general.

In 2010, the opportunity to have access to Broadband has reached 96.6% of OTE's connections (infrastructure coverage). With broadband connections approaching 2,303,000 in the Greek market at the end of 2010 (20.28% penetration of the population), compared to 1,916,630 at the end of 2009 (17% penetration of the population), the broadband environment prevailing in Greece was shaped as set forth below:

*Broadband in Greece 2008 2009 2010*

<i>Points of presence (PoPs) of the ADSL network</i>	<i>1,420</i>	<i>1,501</i>	<i>1,937</i>
<i>LLU connections</i>	<i>650,000</i>	<i>987,300</i>	<i>1,380,000</i>
<i>Percentage of broadband penetration (to the population)</i>	<i>14.5%</i>	<i>17.5%</i>	<i>20.28%</i>

With the primary vehicle being conn-x, OTE remains the primary driving force behind growth in new technologies in the country and the main choice of consumers opting for quality broadband services. Specifically, in December 2010, OTE's retail ADSL customers surpassed 1,110,000 and the upward trend recorded in the penetration of Broadband among OTE customers meant that the latter percentage rose to 30.89% by the end of 2010.



The map above shows the evolution of Ethernet DSLAM's presence nationwide

## **EXTENDING BROADBAND DELIVERY THROUGH IPTV**

The development of IPTV services by OTE also contributes to the further expansion of broadband. Conn-x TV, OTE's subscription television service, is already available at more than 460 points of presence of OTE's network throughout Greece and is constantly expanding. These points of presence include all the major cities in the periphery, country towns, islands, as well as smaller urban centres with even fewer inhabitants. A search engine is available at "www.oteshop.gr", where users can obtain information on whether OTE's television service is available in their area, by typing in their telephone number.

## **BROADBAND DEVELOPMENTS IN THE REGIONS**

OTE continues to place special emphasis on developing the necessary infrastructure, even in regions with low population density, so that all citizens can have access to new technologies and especially broadband. Furthermore, through its satellite broadband Internet service and the Hellas Sat satellite, OTE's broadband services are now available in even more areas of Greece. Moreover, in 2010, OTE has put WiMAX systems into operation in:

- > Agion Oros
- > Thessaloniki
- > Ioannina
- > The greater region of Attica
- > Samos island
- > Zagoroxoria

*For more information on Broadband developments in the regions you can visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

## **EDUCATING CITIZENS ABOUT BROADBAND AND NEW TECHNOLOGIES**

OTE has adopted an array of actions and initiatives aimed at educating and familiarising the public with broadband services, seeking to bridge both the digital divide between urban centres and remote regions in Greece as well as between Greece and other countries of the European Union.

To that end, in 2010:

- > We completed the Information Campaign targeted at consumers and aiming at raising awareness regarding the capabilities offered by the use of broadband. This campaign was hosted at 88 specially designated areas (Internet Corners) that operated within OTESHOP stores, informing more than 7,000 citizens about broadband services.
- > The 'Computer Re-Use Programme' spanning the entire country was continued for the 5th year, promoting the reuse of computers and other technological equipment at schools and Non-Governmental Organisations.
- > OTE sponsored for the 7th consecutive year, the 'LISIAS' Pan-Hellenic School Contest, in which more than 40.000 pupils participated. The contest teaches fairness between pupils with regard to subjects relating to their interests and school knowledge, while getting acquainted with new technologies, at the same time.

## INTERNET SAFETY

In 2010 OTE launched its new strategy regarding internet safety including a number of new initiatives and aiming to position the company as a leader in this area of CR. Specifically in 2010 OTE:

- > Published a special leaflet, titled “Safely Surf the Internet”, providing simple and useful advice on the proper and safe use of the Internet.
- > Organised information sessions on Safer Internet for OTE employees and their families
- > Commenced planning for a number of public briefing sessions on Safer Internet issues, to start in 2011, in cooperation with the medical advisor of the Adolescent Health Unit
- > Participates in Greek Awareness Centre Saferinternet.gr and in the Safenet non-profit organisation
- > Continued its sponsoring and support of the “Adolescent Health Unit” of the 2nd Paediatric Clinic of the University of Athens at the ‘Pedon P. & A. KYRIAKOU”
- > Offers the technical infrastructure of the toll-free ‘YpoSTIRIZO’ Help Line number (80011 80015 ).
- > Developed the 'Online Protection' service, offering integrated e-mail and computer protection with the use of the Firewall, Anti-Virus and Anti-Spam applications.
- > Provides a section with useful advice on security issues on the OTENET customer service website, at <http://www.otenet.gr/hd/>

- > Manages the <http://www.otenet.gr/hd/HTML/abuse.htm> website, providing information to Internet users concerning safe browsing (spam, mail bombing, hacking, port scanning, etc).

*For more information on “Internet Safety” provided by OTE, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

## TELECOMMUNICATION OPERATORS

During 2010, the Greek Telecommunication Operators market continued to grow at quite a high rate as a result of increasing demand for broadband services; thus OTE continued to play an active and seminal role in this market. Currently, 47 mobile and fixed-line telecommunications operators are active in the overall Greek telecommunications market, of which 16 are interconnected to OTE's telephone network, while 7 providers mainly operate LLU (Local Loop Unbundling) Services.

*For more information on the service portfolio provided to the Telecommunication Operators, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

## FAULT REPORTING CENTRE FOR TELECOMMUNICATION OPERATORS

During 2010, OTE focused on more effectively managing its relationship with Operators and on improving the quality of the services provided. Significant efforts were made to systematically monitor and analyse the Operators market, with the aim of identifying trends and recording emerging client needs, by accurately determining and studying each customer's individual profile. In 2010, the number of Wholesale Line Rental Services faults addressed was 5.630, of which only 73 took more than 20 days to resolve. Specifically, in 2010 OTE:

- > Upgraded the services provided to the operators, by offering numerous services such as: electronic submission of applications, the publication of statistical data and reports, etc
- > Completed the W-CRM system
- > Continued the operation of the 'Provider Fault Reporting Centre' on a 24/7, 365 days/year basis, providing after sales support and significantly improved the response and recovery time
- > Ensured, to the greatest extent possible, our compliance with regulatory requirements

*For more information on the services offered by the "Fault Reporting Centre", visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

# CUSTOMER SERVICE

OTE continued its efforts towards enhancing the quality of its customer service, which contributes towards consolidating the company's leading position in the market within a constantly shifting business environment.

Apart from the OTE Group Store network and the on-line 'www.oteshop.gr' store, which serve thousands of customers on a daily basis, OTE has established an array of specialised call centres designed to meet its clients' needs. OTE's call centres are certified according to the ISO 9001:2000 standard, while they are equipped with fully trained staff and state-of-the-art technological equipment. Moreover, OTE's Customer Care employees are supported by the latest CRM (Customer Relationship Management) applications.

In 2010 the team of 30 Telecommunications Advisors, which was formed in 2009, continued its' operation, providing support to major corporate customers, resolving day-to-day issues, thus improving the promptness of its response to technical support requests.

As a testament to OTE's high quality services offered, during 2010, 47.500 customers returned to OTE from other Telecommunications Operators.

## COMPLAINTS MANAGEMENT

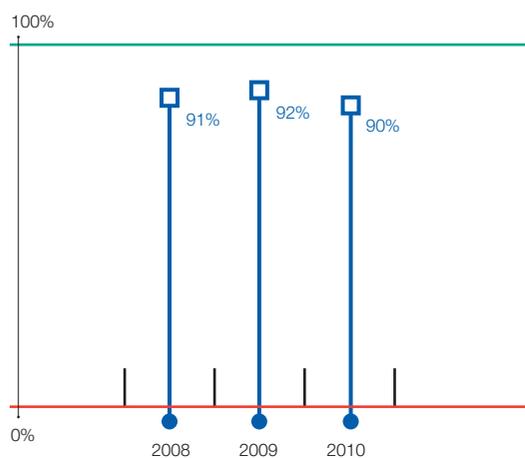
Responding to our customers' feedback and needs in a consistent and reliable manner, OTE makes every effort to immediately resolve complaints and avert any customer dissatisfaction, in order to provide the best level of customer service.

Since 2008, OTE has been operating the 'Complaints Management System', which covers the contact points where requests are recorded such as OTE-SHOP stores, the '134' number in Thessaloniki, the Customer Support Group, the Regional Telecommunications Departments and ancillary services, and provides useful statistical data. The majority of complaints submitted in 2010 concerned:

- > Activation of products / services (e.g. in how many days will the phone line be activated, when will the Internet connection work, etc)
- > Billing issues (e.g. not understanding charges)
- > Technical issues (e.g. why is my Internet connection interrupted, why does the router not achieve the maximum connection speeds, etc.)

The management of all complaints was performed with the aim of providing the optimum level of customer service. In 2010, the average percentage of

written complaints to which we responded within 20 days was 90%, while the majority of oral complaints were resolved within 2 days.



**% Complaints resolved within 20 days**

Moreover, the Voice Portal & Voice Recognition Services Department of the Home Customer Services Division maintains a record of cases of non-compliance regarding customer service. When cases of non-compliance are recorded, special administrative procedures are followed to resolve them. In 2010, there were 15 such cases, which involved:

- > 6 requests by Health Clinics (our customers) for the provision of data and information regarding appointments booked by citizens
- > 2 requests on application operation errors due to connectivity
- > 3 requests on application errors due to application upgrades
- > 4 requests of citizen complaints and provision of information to the public regarding IVR operation (automatic voice recognition system for booking appointments, offered through the Voice Portal).

## STORE NETWORK

OTE offers its' customers a range of technologically sophisticated products and services through an extensive branch network, in order to meet all of its customers' needs and expectations. Currently, the OTE Store Network comprises:

- > 202 OTESHOP stores (Telecommunications Commercial Stores, nationwide coverage)
- > 18 OTESHOP stores (Franchises)
- > 440 GERMANOS stores

For more information on the "Store Network" and other customer services offered by call centres, visit: [www.ote.gr/cr2010](http://www.ote.gr/cr2010) and <http://oteshop.ote.gr/portal/page/portal/OTESHOP/MainPageOTESHOP>

## STORE CERTIFICATIONS

In 2010, the number of OTESHOP (Telecommunications Commercial Stores) certified according to the ELOT EN ISO 9001:2008 standard (quality management system), stood at 127 nationwide. The certification process ensures the provision of quality controlled services, which undergo continuous re-assessment and improvement.

## CUSTOMER SATISFACTION AND LOYALTY BAROMETER

The 'CUSTOMER SATISFACTION AND LOYALTY BAROMETER' survey, which has been conducted by OTE over the last 5 years, involves the planning, development and application of a system for measuring the total experience and loyalty of OTE's customer base, and it offers the company yet another tool in its strategic planning operations.

The survey includes measurements, both quantitative as well as qualitative, targeting residential, business and corporate customers, as well as surveys targeting 'special audiences': '11888' (directory enquiries), '134' (call centre), '121' (fault reporting centre), as

well as the customer service numbers offered by telecommunication operators .

## GENERAL FINDINGS

In 2010, a total of approximately 12.000 clients, across all of our segments (residential, corporate, business, telecommunication operators and special audiences) participated in the Barometer survey.

Overall, the most important findings concerned customer service, prices, products and image of the company.

The customers focused mainly on matters such as:

- > Promotion of packages that combine services (Double, Triple, Quadrant Play)
- > Launch of new products that will meet customers' needs with emphasis on offers to improve «value for money»
- > Improving image and reputation towards innovation, differentiation and modernity, in order to attract more “dynamic” and “energetic” audiences that show more “active” profile
- > Improvement of customer-centric

approach focusing on malfunctions restoration time, monitoring restoration process , and personnel professionalism

## OBSERVATIONS ON CR

The Corporate Responsibility programme implemented by OTE significantly affects the opinion of customers on OTE:

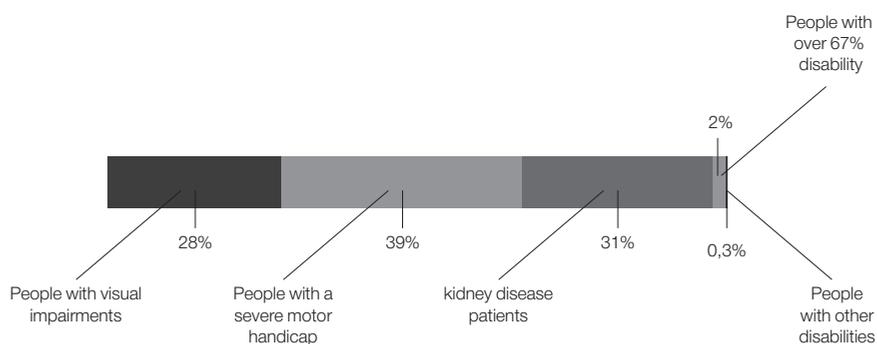
- > 68% of Residential Customers
- > 75% of Business Customers
- > 60% of Corporate Customers

From the above results it emerges that the existence of a Corporate Responsibility programme influences the intent to purchase products and that there is a trend for a shifting of interest towards the environment and vulnerable social groups.

For more information on the “Customer Satisfaction and Loyalty Barometer”, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)

## PRODUCTS-SERVICES FOR SPECIAL GROUPS

OTE, respecting the needs of all citizens, has developed an array of programmes targeting special groups of the population. Specifically:



Number of People with Special Needs offered discounts

<i>Product</i>	<i>Description</i>
<i>Free ADSL connection to excelling students</i>	<i>For the sixth consecutive year (2010), OTE offered free 'Conn-x' Internet packages to excelling undergraduate and postgraduate students. Specifically, OTE offers free Internet access for a year to the five students scoring the highest marks in the entrance examinations for admission to every university course, as well as to the five top-ranking students of every course of every academic year or semester, who achieved academic excellence during the academic year 2009-2010.</i>
<i>Conn-x for students</i>	<i>OTE gives all students the possibility to acquire a broadband Internet connection, via ADSL access, at advantageous rates. 15,411 students made use of this right in 2010 (against 979 in 2009), in accordance with the specifications of the 'Diodos' Action.</i>
<i>Tele-assistance</i>	<i>The target market of the 'Immediate Alert' (OTEALERT) service is people whose physical condition causes them to require assistance and constant monitoring (the elderly, people with special needs etc.) and it numbers more than 1,000 subscribing clients to date.</i>
<i>Teleworking</i>	<i>It gives the option to users (of remote areas, with special needs etc.) to interact in real time, with data, sound and image capability, thus creating an state-of-the-art tele-collaboration environment in their working area, which could be at their home.</i>
<i>Tele-medicine through Video-Conferencing</i>	<i>This service is implemented at Mental Health Clinics, such as 'KLIMAKA', through the interconnection of Drug Rehabilitation Centres, located on islands, with the specialised staff of 'KLIMAKA' clinic in Athens. This application is also operated at EKAV (Hellenic Emergency Medical Service), on a pilot basis, interconnecting islands (Health Centres of Tinos and Samos) with the EKAV Department in Elefsina, with the aim of the interchange of opinions and expertise between specialised staff and country doctors.</i>
<i>Customer Service Call Centre for Deaf People</i>	<i>The help line for the deaf (18855) provides its services to people with hearing impairments, through special devices for people who are hard of hearing. Calls made to the 18855 number from OTE landlines nationwide are charged at the local rate.</i>

## OTHER INNOVATIVE SERVICES

- > Health Line – 1535” In 2010, 3.400.000 calls were made to the Health Line, and 2.121.000 resulted in an appointment.
- > OTE Health Portal ([www.healthpages.gr](http://www.healthpages.gr)): In 2010 OTE’s health portal received 31.155 hits.
- > 112 Phone Line: A toll-free emergency number one can dial both from a landline as well as a mobile phone, from all EU Member-States.

For more information on “Innovative services” offered by OTE, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)

## PRODUCT RESPONSIBILITY AND MARKETING ISSUES

The equipment accompanying the products offered by OTE:

- > Has been certified and bears the mandatory markings required under EU legislation
- > Does not contain hazardous substances
- > Complies with EU Directive 2002/95/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment
- > Is accompanied by detailed instructions for their safe use
- > Consistently complies with regulations and directives concerning the provision of information and markings
- > Complies with the WEEE, RoHS and ICNIRP Directives, as well as

the Presidential Decrees, bringing them into force

- > The Supplier is under the obligation to compensate OTE for any damages that may arise from an infringement of the WEEE, RoHS and ICNIRP Directives in regard to the materials that OTE has procured from it, even in those cases where the materials solely and exclusively bear OTE’s trademark
- > The Supplier is under the obligation to submit the legally mandatory certifications or attestations of compliance for the procured materials to the Product & Applications Division.

In regard to incidences of non-compliance with the regulations and non-binding codes of ethics on marketing communications, including advertising, product promotion and sponsorship, 5 regulatory proceedings were brought against OTE and its products in 2010 (compared to 3 in 2009), of which:

- > 1 was judged to be founded in the law and in the merits
- > 2 were judged to be unfounded in the law and in the merits
- > In 2 cases it was judged that a mandatory prerequisite is to be the immediate modification of the Conn-x connection status report.

For its part, in 2010 OTE filed 6 regulatory proceedings against other providers, of which:

- > 2 were judged to be unfounded in the law and in the merits
- > In 4 cases the provider was ordered to modify its promotional message.

Further information is available at the SEE website: <http://www.see.gr/index.aspx?op=3>

## **DATA SECURITY & PRIVACY**

The OTE Group General Division of Regulatory Compliance and the OTE Regulatory Compliance Committee were set up in 2010 and entrusted with the main mission of the support, verification and assurance of implementation of Regulatory Compliance Policies, in the framework of the Regulatory Compliance Management System. In 2010, 477 employees were trained in combating corruption.

In 2010, the main activities led by the Regulatory Compliance Division in this area included:

- > Development and application of an integrated data and information privacy and security protection and management system.
- > Investments in the use of the latest technical, logistical and administrative tools, in order to ensure confidentiality in telecommunications.
- > Offering to assist and support national authorities conducting investigations against electronic crime.
- > Raising awareness about the importance of the confidentiality of information, including among company employees, by conducting internal communication campaigns.
- > Essential upgrading of Data Security Systems, through a revision of the methodology and procedures followed.

# PROCUREMENT PROCEDURES - CONTRACTING

OTE's new Procurement Regulation has been in effect since 2009. The Procurement Regulation conforms to the new trends prevailing in the supplier market, best practices applied by major telecommunications operators worldwide, as well as OTE's internal needs and business targets.

Specifically, the new Procurement Regulation complies with all environmental and social protection provisions, of both Greek and European Union legislation, while it introduces an array of new procedures and revisions to older procedures, aiming to:

- > Decrease the required time between procurement demand and supply;
- > Achieve significant discounts;
- > Reduce overall procurement costs, taking into account all factors affecting costs;
- > Improve procurement planning and, as a consequence, achieve a more rationalised use of the company's financial resources;
- > Achieve greater flexibility in decision-making and supplier selection processes;
- > More effectively manage suppliers and apply improved procedures for

their monitoring and assessment;

- > Improve the company's negotiating skills with suppliers;
- > Determine the procurement purpose and the most suitable manner to meet the procurement need;
- > Ensure the participation of new suppliers in the company's procurement processes (tender procedures).

## SUBCONTRACTED PROJECTS

All company projects are implemented with the participation of external contractors, which are based on the tender procedure. They are supervised by OTE engineers in collaboration with the Handover Committee (which is established following a relevant decision for each project separately). OTE engineers are responsible for the qualitative and quantitative handover (temporary and final) of the project. Among others, they verify quantities, materials, dimensions and completion times of each project milestone, in view of ensuring that the procedures and technical specifications specified in the tender books are adhered to. Moreover OTE, consistently honouring its commitments for supporting the growth of Rural Regions

and among the local communities where it operates, assigned the implementation of various projects to 638 local contractors, for 2010.

<i>Year</i>	<i>2009</i>	<i>2010</i>
<i>Projects Sub-Contracted following Tender Procedures</i>	<i>638</i>	<i>467</i>

# REGULATORY ISSUES

OTE aspires towards fostering long-term value, repaying its customers for the trust they place in the company and maintaining its high standard of business practices, so that it is in a position to respond to any regulatory matters that may arise. OTE abides by the law and fulfils its legal requirements, while concurrently actively monitoring and participating in both national and European developments and practices being shaped in the framework of public policy deliberations.

The Greek electronic communications sector is regulated in accordance with the European Regulatory Framework, as the latter has been incorporated into national legislation, which consists of Laws, Presidential Decrees, Ministerial Decisions and the Decisions of independent administrative authorities, which receive legislative codification.

The regulatory framework affects the operation and relations of OTE with consumers, the decisions adopted in relation to planned investments in infrastructure, the technologies and services. For that reason, OTE:

- > Collaborates with the Regulatory Authority and the State in order to formulate a policy that will encourage investments, especially investments in next-generation access network infrastructure, and that will boost healthy competition.
- > Supports its positions during discussions on the incorporation of the new European regulatory framework into national legislation, as well as on the framework of competition law.
- > Strives for unbiased treatment by the regulatory authorities, with the aim of achieving the lifting of regulatory requirements placed on departments, provided that the competition is grown adequately.
- > Supports its positions before national and European regulatory authorities, bodies and judicial authorities on issues pertaining to competition law.
- > Ensures it effectively conforms to regulatory requirements, always bearing the company's best interests in mind.
- > Complies with regulatory requirements and participates in shaping the national and European regulatory framework, through the positions it adopts at national and European discussions on regulatory matters.

Specifically, in the strategic context of ensuring a regulatory framework that will serve as a long-term instrument of economic development, safeguarding the interests of the company and OTE customers and contributing towards social prosperity, OTE collaborates with:

- > The Hellenic Telecommunications and Post Commission (EETT)
- > The Hellenic Authority for Communication Security and Privacy (ADAE)
- > The Hellenic Data Protection Authority (APPD)
- > The Hellenic Competition Commission
- > The Greek National Council for Radio and Television (ESR)
- > The Greek Ministry of Infrastructure, Transport and Networks
- > The Greek Ministry of Development
- > The Greek Ministry of the Environment, Energy and Climate Change
- > Other Ministries, as the case may be, for ensuring a proper regulatory framework

## **PARTICIPATION IN EUROPEAN AND INTERNATIONAL POLICY FORUMS**

OTE, in its capacity as member, makes an active contribution in European, as well as international Organizations, such as:

- > ETNO (European Telecommunications Network Operators' Association), where it has one elected Chairperson in the Internet Governance Working Group;

- > ITU (International Telecommunications Union);
- > The Internet Governance Forum, as well as other forums or organisations promoting issues such as consumer protection, communications security and developing synergies among various partners operating in the field of electronic communications, with the aim of creating a reliable regulatory framework for the electronic communications sector.

*For more information on OTE's participation in working groups and consultations, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

## **REGULATORY LITIGATIONS**

Regarding the total number of litigations concerning the breach of competition law, the enforcement of anti-trust legislation and the prohibition of monopolistic behaviour, during 2010 we filed one (1) appeal before the Administrative Court of Appeals of Athens. In total, OTE was subjected to the following in 2010:

- > 27 fines, of which twenty five (25) concern the construction of antennas, one (1) concerned an infringement pertaining to Incumbent Provider obligations and one (1) was imposed for a breach of the provisions of telecommunications legislation in regard to the offer of certain flat-rate plans.
- > 8 non-pecuniary penalties, of which: 6 concern flat-rate plans and 2 concern collocation issues.
- > 2 fines have been imposed by ADAE.

> The total value of imposed fines stands at EUR 1,208.67

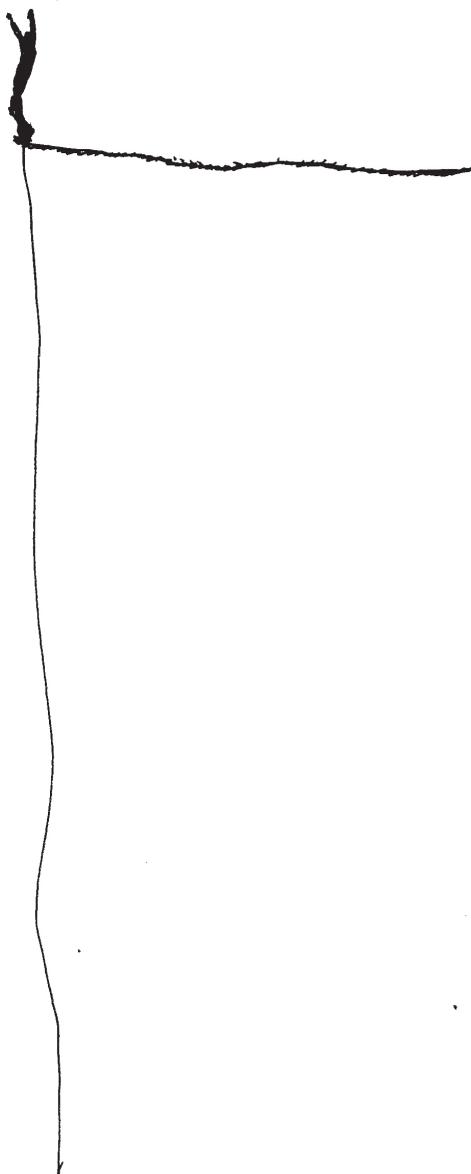
OTE has filed appeals before the competent Courts of Law, seeking the annulment of the EETT decisions.

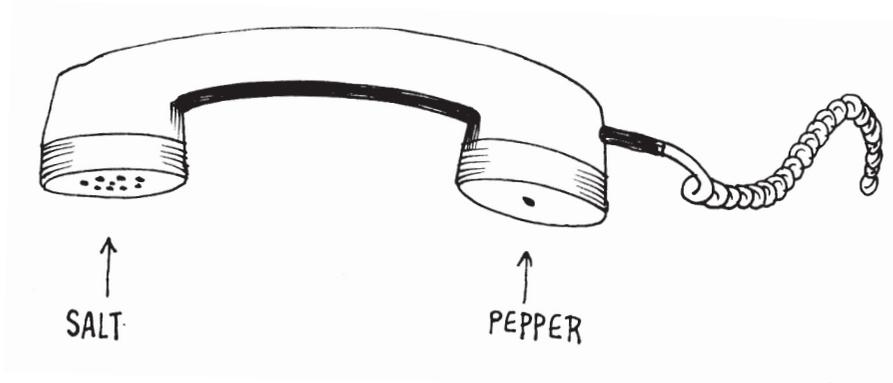
In brief:

<i>Year</i>	<i>2009</i>	<i>2010</i>
<i>Cases in litigation</i>	<i>20</i>	<i>1</i>
<i>Fines</i>	<i>14</i>	<i>29</i>
<i>Non-pecuniary penalties</i>	<i>7</i>	<i>8</i>
<i>Value of fines</i>	<i>13 million €</i>	<i>1,208,674 €</i>

In 2010 the regulatory authority EETT called for a consultation requesting the participation of the Ministry for Infrastructure, Transport and Networks and every other co-competent Ministry, concerning the subject of further expansion of OTE's towards People with Special Needs. OTE participated in the consultation, the results of which have not yet been announced.

IM ON THE  
EDGE!!





# BUILDING TIES WITH OUR EMPLOYEES

OTE remains one of the largest employers in Greece with almost 11,000 employees. The performance and development of OTE employees is intrinsic to the company's performance, especially in the challenging economic era facing Greece.

OTE's strategic goals in employee policies and practices are to increase the company's competitiveness and ensure a quality, safe and productive working environment where employees can develop their talents and contribute to the company's modernisation.

In 2010, the milestones in OTE's employee policies and practices were:

- > Implementation of a voluntary departure program for 461 employees.
- > Implementation of a Corporate Collective Labour Agreement between OTE and OME-OTE for the incorporation of OTENET employees into the OTE Personnel Internal Regulation (hereinafter PIR-OTE), the Transfer Regulation and the OTE Personnel Payroll.
- > Completion of the pilot implementation of HR Helpdesk services, established to provide quick solutions to Human Resources issues and aiming at informing employees on

## Permanent & indefinite term employees (31 Dec 2010)

<i>Age</i>	<i>M</i>	<i>F</i>	<i>Total</i>
20-24	9	11	20
25-29	203	224	427
30-34	886	494	1,380
35-39	781	412	1,193
40-44	990	700	1,690
45-49	1,647	656	2,303
50-54	2,202	340	2,542
55-59	1,128	141	1,269
60-64	74	22	96
65+	1	4	5
<i>TOTAL</i>	<i>7,921</i>	<i>3,004</i>	<i>10,925</i>

Personnel distribution per gender and age

different issues of concern to them (salary, additional benefits, etc.)

- > Establishment and implementation of a new payroll system for indefinite term employees hired before 2005 (from 1 January 2010), and of another one for temporary employees (from 1 March 2010).
- > Establishment and implementation of a new internal job-posting policy for filling vacant positions.
- > Hiring of 68 regular employees with different specialties at OTE departments throughout Greece.
- > Provision of internships at OTE Departments to 907 students while they complete their studies.
- > Implementation of training/e-learning sessions on various issues, such as Compliance Management System, Corporate Security, etc.
- > Intranet use, in such a way that “U-link” is establishing itself as the primary internal communication tool for OTE employees.
- > Prospect of integration of the OTE employee survey into a broader Deutsche Telekom Group survey.

## **QUALITY MANAGEMENT SYSTEMS (QMS)**

OTE is committed to continuous improvement of Quality Management Systems, according to International Standard ISO 9001:2008 for 127 (Telecommunications Commercial Stores) and 15 Administrative Departments.

During 2010, the main advances in *QMS Certifications* were:

- > Improvement of Environmental Management Systems, according to International Standard ISO 14001:2004 for two Departments: the Department of Maintenance and Repairs of the Transportation Means Unit (General Directorate for Regions) and the Customer Technical Support Department (General Directorate for Corporate and Business Customers).
- > Improvement of Occupational Health and Safety Management Systems, according to ELOT 1801:2008 - OHSAS 18001: 2007 standard, for two Departments: the Department of Maintenance and Repairs of the Transportation Means Unit and the Customer Technical Support Department.
- > Design, Development and Implementation of a Quality Management System, according to International Standard ISO 9001: 2008 for a) Internal Protection and Prevention Services (ESYPP) to be implemented regarding occupational health and safety and b) the Attica Sales Support Unit (SYPA).
- > Creation of the annual nationwide program for measurement of the Electro-magnetic Field at OTE buildings.

### *QMS auditing in 2010*

- > Independent certified internal auditors carried out 75 internal audits at scheduled time intervals, in order to locate Non-Compliances and to take corrective measures, in accordance with the requirements of the Quality Management Systems.
- > 6 internal audits were performed at scheduled time intervals in order to locate Non-compliances and to take corrective measures, in accordance with the requirements of the Environmental Management Systems, based on the International ISO 14001:2004 Standard and Occupational Health and Safety Management Systems, in accordance with the ELOT 1801:2008 standard.
- > 4 audits were performed by an external Certification Body (ELOT) in order to locate Non-compliances and to take corrective measures, in accordance with the requirements of the Environmental Management Systems, based on the International ISO 14001:2004 Standard and the Occupational Health and Safety Management Systems, in accordance with the ELOT 1801:2008 standard.

### *QMS training in 2010*

- > Briefings were given by executives from the Department of Administration & Quality, to Department man-

agers and executives, on the development and implementation of ISO 9001:2004 Quality Management Systems, ISO 14001:2004 Environmental Management Systems and ELOT 1801:2008 Occupational Health and Safety Management Systems.

- > Planning and implementation, in cooperation with the Hellenic Management Association (EEDE), of seminars on the EFQM Business Excellence Model and in the context of Corporate Responsibility, Management of Knowledge and External Resources.
- > Participation in the “Committed to Excellence” programme of the EFQM Business Excellence Model for European certification.

## **EMPLOYEE EVALUATION SYSTEM**

In 2010, OTE continued to use the annual evaluation system for the company’s human resources. All employees undergoing evaluation are immediately informed of their performance and discuss it with their evaluator during the personal interviews.

- > In 2010, 1,103 executives and the entire non-executive personnel of the company were evaluated.
- > Participation of non-executive personnel reached 95.8%. Of these 9,890 employees that were evaluated, only 171 (1.7%) filed an objection.

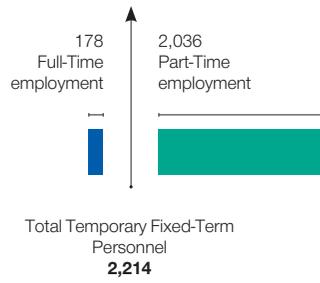
- > The percentage of evaluated employees by gender was:
  - Men: 72% (7,928)
  - Women: 28% (3,065)

The resulting difference between the total number of permanent and indefinite term employees and the total number of employees evaluated is due to changes in the number of employees during the year (i.e. retirement).

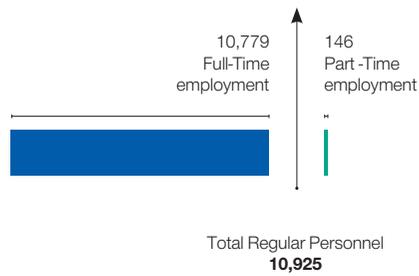
## **OVERVIEW OF OTE'S WORKFORCE**

OTE has a diverse workforce located across the country. In 2010 the overall profile of our workforce is as follows:

- > 13,139 employees, of whom 10,925 (83.2%) are permanent and indefinite term employees and 2,214 (16.8%) are temporary contract employees.
- > Of the total workforce, 5,434 employees (41%) are located in the Attica region of Greece, and 59% in the rest of the country.
- > Of the 10,925 permanent and indefinite term employees, 146 (1.3%) are working part-time.
- > Women comprise 27.5% of permanent and indefinite term employees.
- > Women hold 274 (24%) of the company's management positions.



**Temporary personnel per employment type**



**Regular personnel per employment type**

*For more information on OTE's workforce and graphs, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

# HEALTH & SAFETY

Occupational health and safety is one of OTE's most important priorities, and everyone is aware that the creation and preservation of a healthy and safe work environment for employees, associates, customers and visitors plays an important role in the company's growth.

To that purpose, the Company is committed to:

- > Implement all relevant Legislation and Regulatory Provisions.
- > Create a set of principles for shaping an occupational health and safety culture.
- > Design, promote and implement programmes for improving occupational health and safety.
- > Systematically train all employees in the principles and practices of occupational health and safety.
- > Encourage and support the participation of employees in the improvement of occupational health and safety.
- > Use of safe equipment, as well as of personal protection materials and gear.
- > Develop collaborations on occupational health and safety issues.

Employee participation and consultation with the employer - a key legislative provision - produces more results and is recognised, when it is incorporated into an organised operational framework that aims to benefit employees and company alike. To that purpose, the Company operates 63 Occupational Health and Safety Commissions at national level, in which 173 elected members participate.

All OTE employees have access to the Occupational Health and Safety Policy through the intranet (U-link), so that they can be informed on all relevant issues.

## MAIN ACTIONS

### *Health & Safety performance in 2010*

- > Effective management of occupational hazards in the workplace, aiming at decreasing Occupational Accidents and Occupational Illnesses.
- > Provided first aid, at special health-care areas, to 1,543 employees (compared to 1,610 in 2009) by 11 OTE doctors.
- > Carried out 15,868 medical examinations (compared to 13,755 in 2009), on 4,001 employees (compared to 3,414 in 2009), by 8 OTE

- occupational doctors.
- > Carried out 63 (45 in 2009) Occupational Hazard Evaluation Studies and 7 Electro-Magnetic Field level measurements for OTE buildings.
  - > Carried out 3,554 inspections (compared to 3,713 in 2009) in work-areas, by 12 safety technicians and 8 occupational doctors.
  - > Participation in the development of workplace safety standards (e.g. Telecommunications Commercial Stores, Personal Protection Gear), equipment and materials (e.g. select protective shoes for professional use by technical crews).

#### *Health & Safety training and communication in 2010*

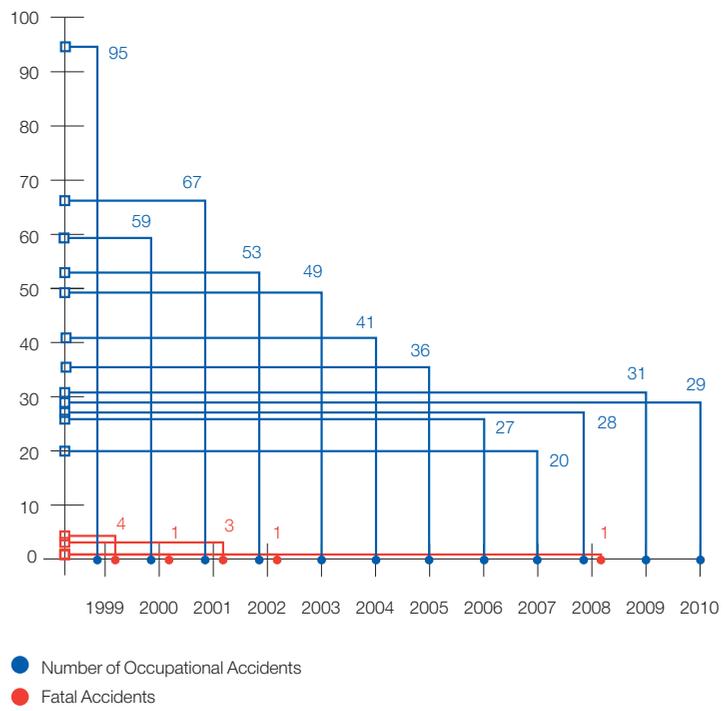
- > Conducted training programmes on health and safety issues and carried out seminars and conferences for personnel categories nationwide. 125 employees were trained on health and safety issues, with a total of 955 man-hours of training.
- > Carried out briefings by safety technicians and occupational doctors at various work areas.
- > Developed collaborations with other bodies (Occupational Health and Safety Committee, Labour Inspection Authority, Ministry, Health and Safety Institutes, labour unions, insurance bodies etc.).
- > Created a help line (1256) through which OTE employees wishing to

- quit smoking can obtain information by the OTE occupational doctors.
- > The Civil Emergency Planning & Fire Safety Department, in the framework of training provided to OTE employees on fire safety – fire prevention issues (theoretical and practical training) during 2010 and in cooperation with local departments and Fire Fighting services, conducted the following training sessions at 3 main OTE buildings:

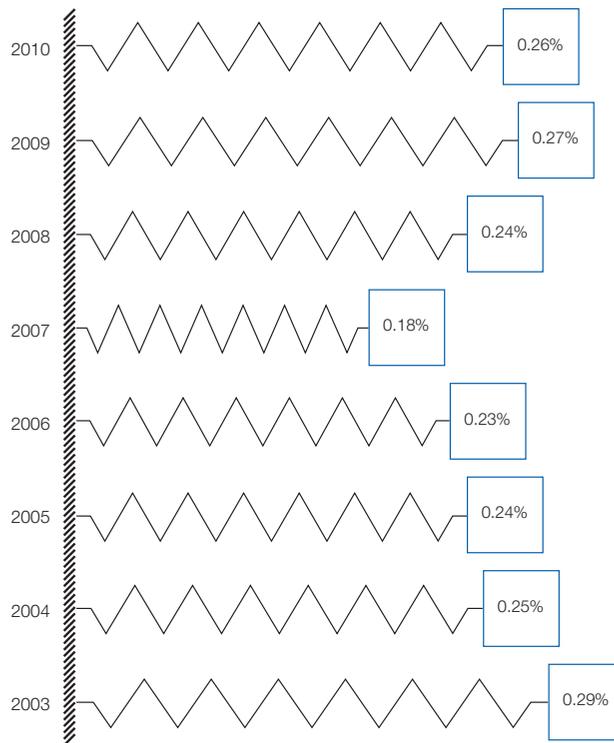
*For more information on OTE's Health & Safety, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

## **OCCUPATIONAL ACCIDENTS**

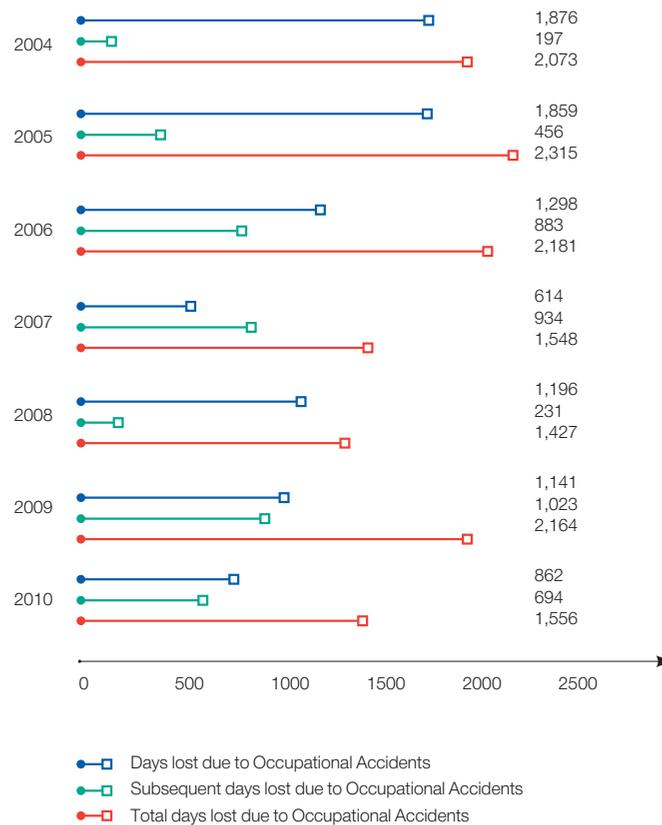
The following graphs show the number and the percentage of occupational accidents (of total employees), as well as the total number of calendar days lost due to occupational accidents during 2010 compared to preceding years.



**OTE Personnel Occupational Accidents 1999-2010**



**Accident Percentage 2003 - 2010 (of all the employees)**



**Time lost (in calendar days) due to Occupational Accidents**

*Number of occupational accidents by gender, in 2010*

<i>Men</i>	<i>20</i>
<i>Women</i>	<i>9</i>

Also, in 2010, of the total number of occupational accidents, the number of accidents that occurred **during work hours** was 21 (15 men and 6 women), while the number of accidents that occurred **during the journey** from home to work and vice versa was 8 (5 men and 3 women).

# EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

OTE applies its policy for equal opportunities and total respect for human rights to all its employees. In this particularly sensitive area, in order to rise to the challenges and needs of our time, OTE has established a strong internal regulatory framework, which is based on:

- > The OTE Personnel Internal Regulation (PIR-OTE)
- > The Company's Code of Ethics & Business Conduct
- > The 'Compliance Management System' (since July 2009) and approval of a Policy on Averting Conflicts of Interest & Combating Corruption, as of 17 December 2010 (Implementation in 2011).

Further information regarding these Codes, can be found on the following website: <http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/diafaneiapliroforisi/codeofethics>

The regulatory framework prohibits the use of child labour or the employment of youths for hazardous work.

According to the Personnel Internal Regulation (PIR-OTE) "the company respects and guarantees the freedom of political and philosophical beliefs, to the extent specified by the Constitution and applicable legislation." The right to freely carry out trade-union activities and collective labour negotiations, is not

only under no risk, but protected in the best possible manner in our Company, with the full implementation of all the stipulated legislative provisions. All company employees, regardless of the work they perform, are covered by agreements that are based on collective negotiations.

Company employees are immediately informed of important operational changes, through the Intranet, but also through the notification of important Company decisions directly to Departments.

No discrimination incident was reported in 2010 or 2009. The average age of OTE employees (regular personnel) is 45.46 years.

### *Average age of OTE employees (regular personnel) per gender*

Male	46.71
Female	42.17

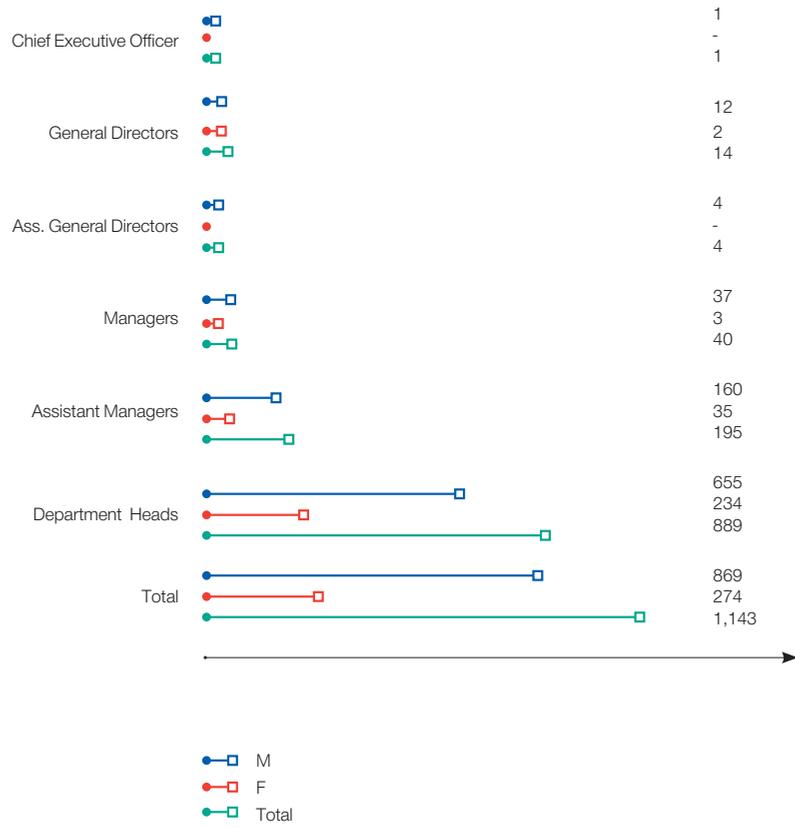
The following diagrams show OTE personnel gender distribution with respect to governance bodies and positions of responsibility, as well as male-female distribution for all OTE personnel for 2010.

### *Governance Bodies*

#### *by Gender, 2010*

	<i>M</i>	<i>F</i>	<i>Total</i>
Board of Directors	10	0	10
Board Committees	6	0	6
Management Team	12	2	14

**Governance Bodies by gender**



**Positions of responsibility per gender**



**Personnel distribution per gender**

## BASIC AND ADDITIONAL BENEFITS

All regular (permanent and indefinite term) OTE personnel have basic benefits (salary, pension, life insurance, medical coverage and disability coverage). Also, on a case by case basis, OTE offers its employees a number of additional benefits, beyond those stipulated under Greek law, aiming at achieving a work-life balance.

Specifically:

- > Mutual Benefit Fund, personal loans, youth account, childcare expenses etc.
- > Additional group life, inability to work and hospital and outpatient health insurance coverage
- > Lump sum of EUR25,000 to all employees who have nine children
- > A free computer and printer to all employees who have four children
- > Financial rewards to employees that attain degrees from Universities, Technical Colleges and in foreign languages
- > Executives holding positions of responsibility are given a company mobile phone
- > There is a Stock Option Plan available to 2,7% of the OTE's employees.

## RECRUITMENT AND TERMINATION

At OTE there is no gender discrimination regarding remuneration of any kind.

Employees' basic salary is calculated based on their years in employment and educational level.

The Company's Management decides and approves recruitments, following the announcement of the job openings and after the choice of the successful candidate, in accordance with the procedure and criteria specified for each case.

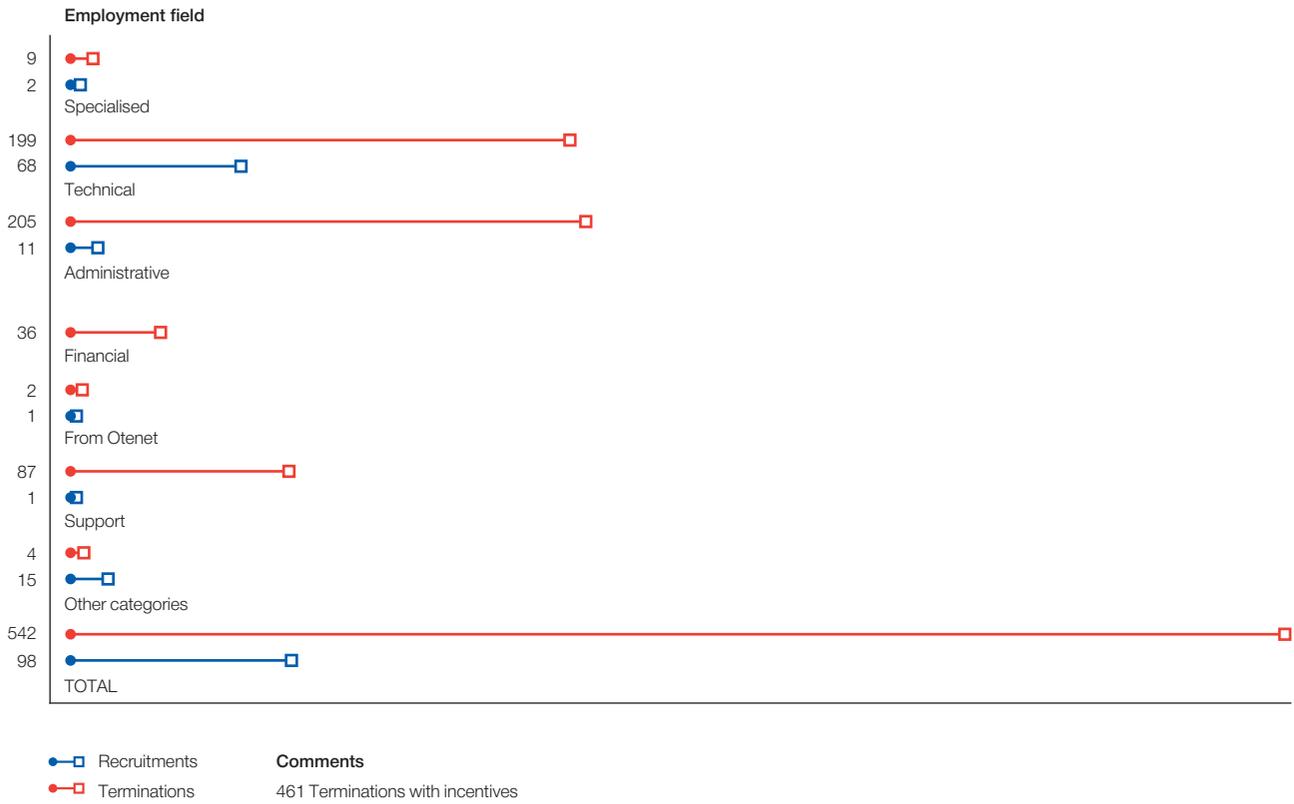
In 2010, there were 98 recruitments (of which approximately 70 were made also on grounds of locality) and 542 terminations (of which 461 concerned departures with incentives).

The Company's policy on personnel recruitment does not discriminate against social groups (e.g. women, people with disabilities, people with religious beliefs other than the official religion recognised under the Constitution, foreign nationals, people with certain distinctive social characteristics etc).

Job openings are posted on a specialised website ([Karriera.gr](http://Karriera.gr)) as well as on the Company's website.

<i>Educational Level</i>	<i>Number</i>
<i>Elementary</i>	<i>2</i>
<i>Secondary</i>	<i>29</i>
<i>Technological</i>	<i>44</i>
<i>University</i>	<i>17</i>
<i>Post-graduate</i>	<i>6</i>

**Educational Level of new Recruits  
(Regular Personnel)**



**Number of terminations & new recruitments per field**

For more information, Recruitment and Termination, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)

**SPECIAL HIRES**

OTE employs 344 people with special needs, 34 of which have Positions of Responsibility.

<i>Positions of responsibility</i>	<i>2009</i>	<i>2010</i>
<i>Head of sections</i>	<i>14</i>	<i>16</i>
<i>Project managers</i>	<i>24</i>	<i>18</i>
<b>TOTAL</b>	<b>38</b>	<b>34</b>

**Employees with special needs at Positions of Responsibility**

# TRAINING PROGRAMMES

OTE's training programmes aim at upgrading and promoting the new training philosophy that teaches multiple skills and necessary techniques regarding good communication and the provision of quality customer services, as well as the more efficient promotion of Company products and services.

In the effort to better train as well as familiarise human resources with specialised knowledge that results in better adaptation to the company's development goals OTE has created a systematic training cycle consisting of the following stages:

- > Diagnosis of training needs
- > Planning - designing training programmes
- > Implementation of training and education programmes
- > Evaluation of training activities

<i>Training</i>	<i>2009</i>	<i>2010</i>
<i>Total training hours</i>	<i>158,430</i>	<i>135,368</i>
<i>Average training hours per year, per trainee</i>	<i>24</i>	<i>23</i>
<i>Total trainees</i>	<i>6,853</i>	<i>5,895</i>

**Total training hours**

*Average training hours per year by gender, in 2010*

<i>Men</i>	<i>28.92</i>
<i>Women</i>	<i>111.50</i>

#### **Average training hours**

Also, in 2010 and in cooperation with OTEAcademy, mandatory for all employees, e-learning courses on **Security Awareness** were provided, aiming at providing in-depth training and awareness to all OTE employees on security issues (7,672 participants).

The number of employees that were classroom trained on **Compliance issues (combating Corruption)** was 477, from a total of 586 employees (in scope), with a participation percentage of 81,40%.

The Security Personnel Administration Department, in cooperation with OTEAcademy, provided **training to Security Personnel** (94 units) from 20 April 2010 to 13 May 2010, on "Basic Principles of Installations Security".

For more information on OTE's Training Programmes, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)

# INTERNAL COMMUNICATION

The company's priority is to provide accurate and continuous information to all employees and boost cooperation, team spirit and cohesion between employees, which are achieved through a number of communication tools such as:

## OTE CH@T

Since December 2007, when it was first published, the official internal magazine of employees, "OTE Ch@t", has been issued every 3 months.

- > In 2010, a total of 64,000 issues (compared to 69,000 in 2009) were sent to employee homes, OTE Cultural Centres, OTESHOP stores, as well as representatives of Group subsidiaries.
- > A permanent cross-corporate team of 14 members from all the General Directorates, plus a 6-member editing team, work on writing the magazine, which covers a variety of subjects, whereas about 111 employees, in total, participated in 2010 in drafting the magazine's content.

## INTRANET

Year on year, OTE's intranet, the "U-link", is establishing itself as the primary internal communication tool for OTE employees, remaining committed to its goal to inform employees in a timely and direct manner, as well as to facilitate their access to information and encourage cooperation between company departments.

In 2010:

- > The number of employees with U-link access amounted to 10,400 (an increase of 9.5%).
- > 66 new topics and more than 1,500 new documents were added to the intranet site.
- > 27 promotional actions, in total, through banners (27% increase compared to 2009).
- > The employee team that represents the company's Departments and contributes to the publication of the intranet topics, now consists of 382 executives (an increase of 9%).
- > The first electronic survey was conducted regarding employee satisfaction from using the company's intranet site, which found

that 70.2% of participants evaluated U-link as “very satisfying to exceptional” and 94% as “quite to very important” for the company. The survey’s results are used to further develop the U-link system and enrich its topics in 2011.

In 2010, U-link became the basic communication vehicle for raising employee awareness on Corporate Responsibility issues, providing detailed information regarding OTE’s Corporate Responsibility Programme and guaranteeing easy employee access to the relevant available material (Corporate Responsibility document and Annual Corporate Responsibility Reports, etc).

Indicatively, in 2010, 93 relevant publications of items on CR were made (40% more than in 2009).

For more information on OTE’s Internal Communication, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)

## **COMMUNICATION ON CORPORATE RESPONSIBILITY ISSUES**

Through U-link, OTE’s website, as well as through the corporate magazine, the Annual Corporate Responsibility Report and other CR documents, the CR Section and OTE’s management inform employees on developments and initiatives, such as:

- > OTE Employee Volunteerism Programme
- > OTE Employee Blood Donor Programme
- > Volunteerism Programme for the World Games Special Olympics ATHENS 2011
- > OTE’s participation in the Europe Corporate Games

- > Employee Health and Safety Issues
- > Internet Safety Issues
- > Actions of OTE Employee Cultural Centres and OTE Choirs
- > 51 e-mails on several internal employee information issues were sent in 2010 (compared to 39 in 2009)

## **INTERNAL CAMPAIGNS**

Through U-link, as well as through printed material (posters, publications etc.), we carried out the following programmes, supported by internal campaigns, for briefing and training of OTE employees:

### *Corporate Security Programme*

An awareness programme for all OTE employees on issues regarding the protection of Company property (material and immaterial) and minimising the possibility of damage caused by hazards, aiming at creating a security culture.

Detailed updates, through the intranet, can be found in specific sections such as:

- > IT Security
- > Systems & Networks Security
- > Physical Access Security
- > Fire Safety

### *Anti-smoking Programme*

Measures, aiming at implementing a smoking ban in all closed company areas and helping employees permanently quit smoking were introduced. A help line (1256) was also created, through which all employees wishing to quit smoking can obtain information from OTE occupational doctors.

### *Programme for the Compliance Management System*

Information and reading material were posted on the intranet for the awareness of the company’s employees regarding Compliance issues, such as:

Principles of the Compliance Management System,

Organisational structure of the system, Policies, Risk assessment etc.

Further information on these programmes is available in the Corporate Governance section.

*Growth Strategic Programme (7 crucial projects)*

A dynamic programme for the restructuring of the company, in order to successfully handle modern challenges, covering seven subject areas and four individual targets, for which the executives of OTE were briefed.

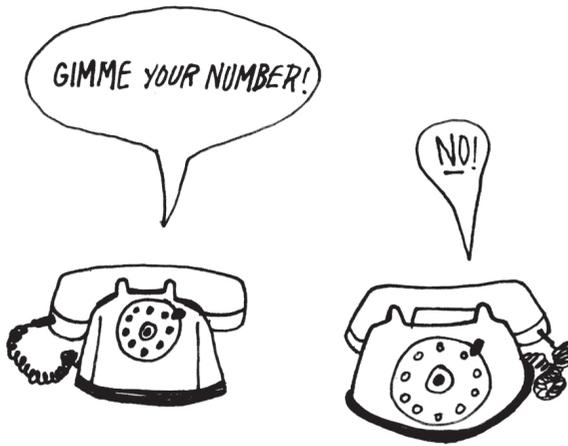
For more information on OTE's Internal Campaigns, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)

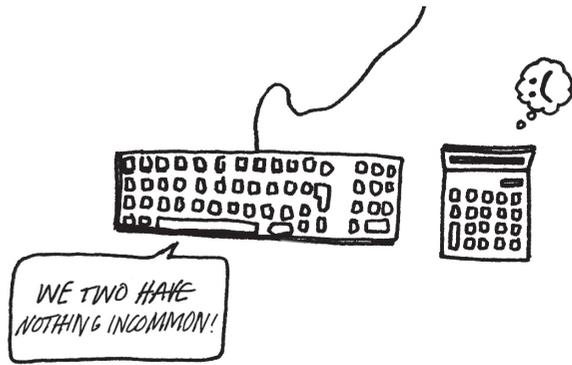
## PERSONNEL ENTERTAINMENT

Activities and initiatives provided to employees so that they can make creative use of their free time are supported by OTE, as they help in balancing professional and family life, which is an important element of the company's culture, values and principles. More specifically:

<i>OTE Action</i>	<i>Description / Information</i>
<i>Organisation for OTE Employee Vacation Centres (OPAKE-OTE)</i>	<ul style="list-style-type: none"> <li>▪ 2 Vacation centres</li> <li>▪ collaboration with selected hotels throughout Greece</li> <li>▪ in 2010, approximately 13,700 people used these programmes</li> </ul>
<i>OTE Employee Cultural Centres</i>	<ul style="list-style-type: none"> <li>▪ 53 Employee Cultural Centres (art, entertainment, sports)</li> <li>▪ Approximately 20,000 active members</li> </ul>
<i>OTE Choirs</i>	<ul style="list-style-type: none"> <li>▪ Participation in concerts and Festivals in Greece and worldwide.</li> <li>▪ Participation in the 3rd International Choir Festival in Istanbul with 4 concerts</li> </ul>
<i>Europe Corporate Games</i>	<ul style="list-style-type: none"> <li>▪ 153 employees / athletes</li> <li>▪ 10 sports events</li> <li>▪ 48 personal metals</li> <li>▪ 6 corporate awards</li> </ul>
<i>Raffles: Automated electronic raffle system for participation in events receiving OTE sponsorships</i>	<ul style="list-style-type: none"> <li>▪ 45 raffles</li> <li>▪ 32,146 participations</li> <li>▪ 1,973 tickets awarded for sports events / concerts / shows etc)</li> </ul>

### OTE Employee Entertainment Actions





# **BUILDING TIES WITH THE ENVIRONMENT**

OTE acknowledges that businesses with a leading role in Europe are those that combine financial growth with environmental protection and environmental awareness in all aspects of its operation.

In this respect OTE recognizes its own responsibility and aims to actively contribute to the mitigation of the global environmental issues, such as climate change and natural resources conservation. In this context, a series of initiatives and actions are being developed, in line with international rules and practices, with qualitative and measurable quantitative goals. OTE aims at decreasing the impact of its operations on the environment, thus contributing to the establishment of corporate environmental responsibility. To meet this objective, an integrated environmental policy and management scheme has been formulated with clearly defined annual improvement benchmarks set each year (see CR Goals & Achievements Table in this Report). At the same time we look for the design and development of products and services that enable our customers in reducing their environmental impacts.

## **ENVIRONMENT POLICY**

The key elements of our environmental policy are compliance with environmental legislation in all aspects of our operation as well as in products / services developed and provided, monitoring and reporting of our environmental footprint, and the formulation of appropriate measures for reducing our footprint. In that context, we analyze the environmental impacts

associated with our operations, products and services taking into consideration: energy consumption, climate change and other gases emissions, raw materials and waste management, water consumption, ozone layer and electromagnetic radiation.

Aiming at the continuous improvement of our environmental performance, we:

- > Analyze, monitor and strive to systematically improve the calculation of our environmental impact.
- > Design and implement measures for reducing our environmental impact by considering:
  - Rational use of energy, water and raw materials.
  - Promotion and utilization of Renewable Energy Sources.
  - Reduction of greenhouse and other gases emissions.
  - Recycling of raw materials and consumables.
  - Minimization of any potential impacts from electromagnetic radiation.
  - Environmental awareness
- > Invest in research & development through our participation in national / international research programs.

- > Develop products and services that enable our customers to improve their environmental performance.
- > Actively participate in the on-going, formal or informal, consultations regarding climate change mitigation and environmental protection in general.
- > Raise environmental awareness of our employees and customers.
- > Support actions and initiatives undertaken by environmental organizations.

# MEASURING AND REPORTING OUR ENVIRONMENTAL IMPACT AND INITIATIVES

The environmental policy of OTE aims at the reduction of the environmental impacts associated with its operation and the development of products and services that enable our customers to reduce their environmental impacts contributing in this way to the improvement of the environmental state in Greece.

Accordingly, in this section of our CR Report we report our Environmental impact and performance in the following dimensions:

- > Environmental impacts from OTE operations in Greece (energy consumption, greenhouse gases and other gases emissions, raw materials and waste management, water consumption, ozone layer and electromagnetic radiation)
- > Measures for reducing our energy use and GHG emissions (renewable energy use, energy conservation, equipment and fleet initiatives, energy-reducing products and services)
- > Raw materials and waste management policies and initiatives (technical waste, paper use reduction and recycling, equipment recycling, oils, batteries and tires, OTEShop recycling)

## ENVIRONMENTAL IMPACTS FROM THE OPERATION OF OTE IN GREECE

This section provides an overview of the environmental performance of OTE in 2010. More details can be found in the online version of this report.

In order to provide reliable and accurate information regarding our environmental performance, an environmental data collecting system has been developed. This system was expanded in 2010 to cover discretely, apart from the regions of Attica and Northern Greece, the region of Southern & Western Greece.

## ENERGY CONSUMPTION

In 2010, total energy consumption of OTE amounted to 1,550 TJ. Energy consumption in 2010, excluding diesel consumption in stationary engines (figures for the period 2007 – 2009 refer to planned tenders for supplies, while figures for 2010 concern actual consumption), increased by 6% compared to 2009 (from 1,450 TJ in 2009 to 1,535 TJ in 2010). More specifically:

- > Fuel consumption for space heating in 2010 (heating diesel and natural gas) reduced by 18% compared to 2009 as a result of space consolidation and the higher average winter temperatures prevailed in

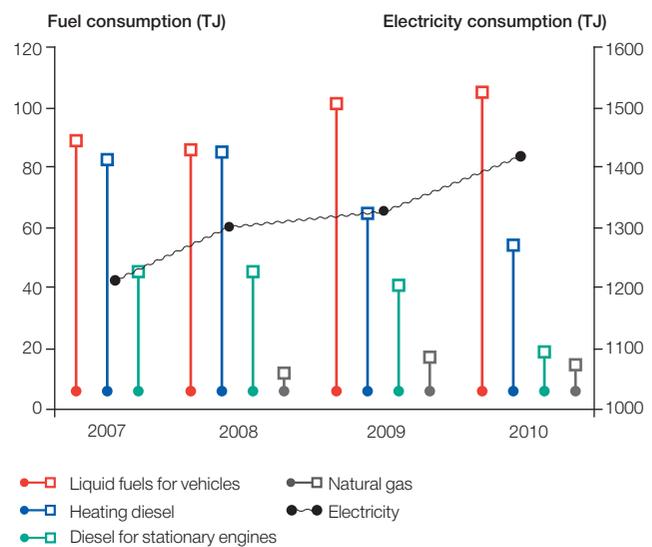
2010 compared to 2009 (e.g. heating degree-days in Athens for 2010 were about 10% lower compared to 2009 heating degree-days).

- > Fuel consumption for OTE owned vehicle fleet increased by 4% compared to 2009, while transportation activity reduced by 7%. The specific consumption of vehicles running on unleaded gasoline increased to 11 lt/100 km (from 10 lt/100 km in 2009, with the share of leaded gasoline decreasing continuously as a result of the renewal of the vehicles' fleet.
- > Total electricity consumption of OTE (1,380 TJ in 2010) increased by 7% compared to 2009. This trend is mainly attributed to: (a) The increase of the services provided that in terms of data transferred was about 20% reaching 182 Gbit/s in 2010; (b) The increase by 120% of the average access speed to the broadband network, which at the end of 2010 reached 9.43 Mbps compared to 4.28 Mbps at the beginning of 2010; (c) The increased co-installation with telecommunication operators and (d) The higher average summer temperatures prevailed in 2010 compared to 2009 (e.g. cooling degree-days in Athens for 2010 were about 9% higher compared to 2009 cooling degree-

days) that resulted in increased cooling needs.

The stemming of electricity consumption growth rate and its eventual transformation to a reduction of the electricity consumption to the extent that is technically and economically feasible, represent the key priorities of OTE.

Direct primary energy consumption for 2010 (excluding electricity consumption and district heating) is estimated at 168 TJ, and indirect primary energy consumption (by allocating to OTE the energy consumption needed for the production of the electricity and the district heating consumed by OTE) is estimated at 3,244 TJ.



#### Fuels & Electricity Consumption

For more information on Energy Consumption, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)

## GHG AND OTHER GAS EMISSIONS

OTE launched, in 2007, a program for monitoring greenhouse gases (GHG) and other gases emissions arising from its operation on a national and regional level but also at individual buildings level. Under this program direct emissions (scope 1) from fuel consumption in OTE owned / controlled installations,

vehicles, etc., and indirect emissions (scope 2) from electricity and district heating consumption are covered.

In 2010, total GHG emissions from energy consumption were estimated at 322,749 t CO<sub>2</sub> eq (direct emissions, i.e. emissions due to fuel consumption from sources owned or controlled by OTE, account for 4% of the total), presenting an increase of 6% compared to 2009. This increase is mainly attributed to the increased (by 7% compared to 2009) electricity consumption.

In addition, OTE continues and expands the program (started in 2008) for the estimation of the environmental footprint at building level. Three additional (to those already included in the program from the regions of Attica and Northern Greece) buildings from the region of Southern & Western Greece were included in the program in 2010.

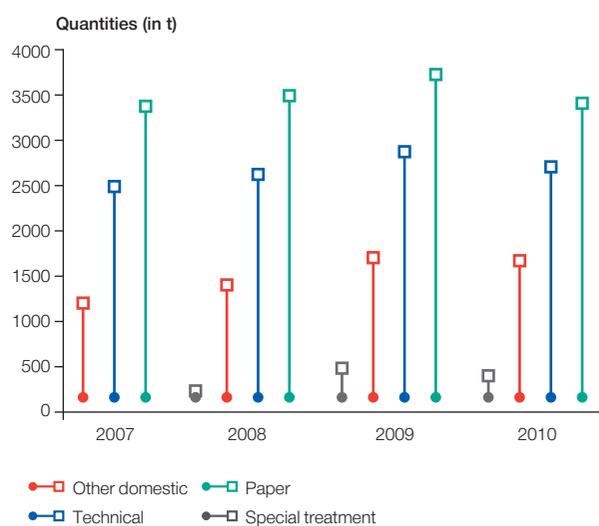
The monitoring of emissions across the entire life cycle of products and through the value chains of businesses receives special attention in the context of voluntary and regulatory initiatives. In that context, OTE is extending the scope of its emissions inventory so as to include estimates for indirect (scope 3) emissions associated with its operation. At the moment, the emission sources quantified are solid waste disposal, leased vehicles for the transportation of executives / employees and business air travels abroad.

For more information on GHG and other gas emissions, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)

## SOLID WASTE

OTE solid wastes include those that require specific treatment (e.g. lubricants, stationary engines batteries, racks with accessories that require special treatment, fluorescent lamps), technical waste associated with material and equipment used by OTE and domestic waste. Total generated solid waste amounted to 3,430 t in 2010, with printing paper (A4 paper) accounting for about 10% of total generated waste

(360 t approximately). Recycling, through authorized (for waste management) companies, represents the major management practice utilized by OTE. Existing recycling programs cover the whole of technical waste and about 37% of paper. Solid waste disposed accounts for about 40% of the total waste generated.



### Solid Waste Generated

For more information on Raw materials and waste management, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)

## WATER CONSUMPTION

In OTE, the use of water covers sanitation needs in buildings and stores as well as catering and water supply of large buildings. Water consumption was continuously decreasing from 2007 to 2009, but an increase of 6% compared to 2009 was estimated in 2010 (243,484 m<sup>3</sup> in 2010, excluding water consumption from privately owned wells). The causes of this increase are under examination with the water provider.

Wastewater from the operation of OTE refers to domestic wastewater, which is treated according to area-specific processes (e.g. municipal wastewater facilities). No planned or unplanned water discharges to the environment took place during 2010.

## OZONE LAYER

OTE is gradually replacing old cooling systems operating with ozone depleting substance (ODS) as refrigerants, while fire suppression systems use suppressants with zero ozone depleting potential (ODP).<sup>(1)</sup> The ODS (i.e. R22) quantity being replenished in the existing cooling systems for 2010 in the regions of Attica, Northern Greece and Southern & Western Greece amounted at 193 kg ODP (of which 79 kg ODP in Attica). The corresponding quantities replenished in 2009 for Attica were 162 kg, i.e. a 50% decrease of the ODS quantities being replenished is observed.

Currently, HFC blends are utilized either for substituting ODS or for installation in new cooling systems. The quantity replenished for 2010 in the regions of Attica, Northern Greece and Southern & Western Greece (about 3,100 kg of refrigerants) is equivalent to GHG emissions of 5,060 t CO<sub>2</sub> eq approximately.<sup>(2)</sup>

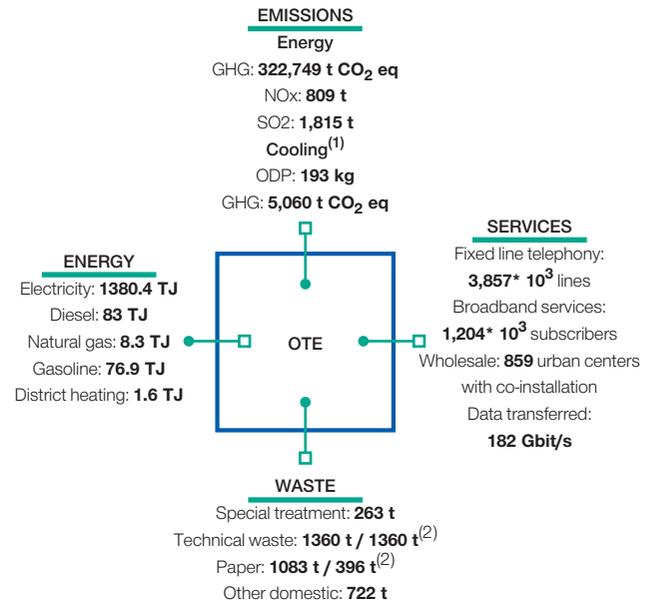
(1) Ozone depleting potential is measured as R12 equivalent. The calculation of ODP for R22 is based on a factor of 0.055.

(2) Emissions of 1,550 t CO<sub>2</sub> eq reported in the CR report for 2009 referred only to the region of Attica.

## ELECTROMAGNETIC RADIATION

Our products bear all necessary labels foreseen by national and EU legislation (see Building ties with the Marketplace for more information).

In order to ensure that any potential impacts from electromagnetic radiation associated with the construction and operation of wireless communication stations are mitigated we conduct environmental impact assessments. The cost of these studies amounted to 387,100 €. Nevertheless, there were fines imposed on OTE for 2010 amounting to 35,646.16 €.



(1) Attica, Northern Greece, Southern & Western Greece  
(2) Quantities recycled

For more graphs, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)

## MEASURES FOR REDUCING ENERGY USE AND GHG EMISSIONS

Climate change is a global problem affecting the environment, the society and economic development. According to the 4th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) climate change is already occurring and is related to anthropogenic activities. Consequently at global, EU and national levels, there are on-going formal or informal consultations regarding the formulation of an effective set of policies and measures for climate change mitigation not only at public but also at private level. OTE's contribution in dealing with the climate change consists of adopting practices to reduce emissions and developing products and services that contribute to GHG emissions reduction. At the same time these practices have been found to contribute to the reduction of the Company's operating cost.

In this context, we aim at:

- > The utilization of Renewable Energy Sources. OTE has installed and operates 179 small photovoltaic units (total capacity 286.8 kW) since 1994 to cover the electricity needs of its Rural Subscriber Radio repeaters and a larger photovoltaic unit at the Antikithira Police Station (20 kW). Also, the power for the wireless broadband network, WiMAX, of Agion Oros, is supplied mostly by upgrading existing photovoltaic systems and three small wind turbines of 1kW each.
- > The adoption of energy conservation practices. The initiatives in place aim at: (a) energy conservation in buildings, (b) the efficient use of electricity in the telecommunication equipment and (c) the renewal of other equipment used by OTE as well as vehicles' fleet. A delay in the implementation of the planned energy conservation intervention was evidenced in 2010.

OTE signed, in 2010, the Code of Conduct on Broadband Equipment developed in the framework of the "EU Standby Initiative" of the European Commission. In accordance to the Code, OTE commit itself to follow current, and any future, guidance on power consumption of broadband equipment used in its network but also by its customers.
- > The reduction of road transportation activity. The development and the operation of «HELP-DESK» and Call Centers aiming at fault correction with telephone directions result in a reduction of transportation needs. At national level, about 25% of calls for fault correction (ADSL, fixed telephony and Land Loop Unbundling connections) were resolved by phone. The program (launched in 1999) for personnel commuting to and from their workplace contributes also to the reduction of road transportation activity.
- > The design and development of products and services that contribute to climate change mitigation. Infrastructure development and broadband expansion will guarantee new, faster ways of communication, employment and exchange of information with indirect positive effects on environmental protection and GHG emissions reduction due to reduced transportation needs, raw materials conservation, etc. The provision of services implemented through teleconferences, internet services and e-applications (for internal needs as well as for our customers), VLANs contribute to this direction as well as the broader implementation of the SIZEFXIS program and its expansion (SIZEFXIS II).

In 2010 there were 420 audio conferences-and 110 video-conferences for the operational needs of OTE as well as 1351 audio conferences-and 25 video-conferences by business customers.

GHG emissions avoided as a result of the initiatives undertaken by OTE in 2010 are estimated at 6,000 t CO<sub>2</sub> eq (around 2% of total GHG emissions from the operation of OTE in 2010). This reduction was estimated taking into account recycling, use of renewable energies, the operation of HELP-DESKs & Call Centers, services provided to telecommunication Operators, natural gas penetration, teleconferences for the operational needs of OTE and personnel transportation.

In order to promote further RES exploitation and energy conservation in our installations, in the 2011 budget of OTEestate (a subsidiary of OTE responsible for the management of the Group's real estate assets and for the generation of incremental value for the Group, through the efficient management and commercial exploitation of its real estate portfolio) amounts have been registered for the development of wind energy and photovoltaic projects and for energy conservation interventions in three buildings in Attica.

In addition, OTE actively participates (through its membership to European and international organizations, see Building ties with the Marketplace for more information) in the public consultation for climate change mitigation. In this context, OTE, as a member of the Global e-Sustainability Initiative (GeSI), signed the Guadalajara ICT Declaration for Transformative Low-Carbon Solutions, regarding the contribution of the ICT sector to climate change mitigation.

*For more information on Measures for reducing energy use and GHG emissions, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

## RAW MATERIALS AND WASTE MANAGEMENT

The key principles of OTE's policy regarding raw materials and waste management are summarized as follows:

- > Reduction of using materials whose production has an impact on the environment.
- > Recycling of used material (e.g. paper).
- > Reuse of materials either internally or through the collaboration with authorized waste management entities.
- > Special treatment of waste that contaminate the environment (e.g. electronic equipment, lead batteries, and materials that contain substances dangerous to the environment).
- > Public awareness to increase participation in recycling practices.

With a view to ensure the rational disposal of used materials (and their potential reuse), we have in place programs for the alternative management of the used materials. In that context OTE has signed contracts with authorized solid waste management entities. The scope of these contracts includes:

- > Technical waste. There is a centralized system for the management of technical waste through the Central Warehouse of OTE in Par-nitha. In 2010, 1,257 t of technical waste was forwarded to ELVAN for further processing. In addition, 53 t of waste timber and 2,690 kg of

empty plastic containers of electrolyte were forwarded to "GENERAL PAPER RECYCLING REAL ESTATE & HOTEL CO. S.A." and "NEILOS TECHNICAL TRADE Ltd" respectively.

- > Paper. Paper recycling refers to packaging material from OTE supplies as well as from the various recycling systems in place. The total quantity of paper recycled was 269 t (the quantities in Attica are recycled through "PAPER RECYCLING SA"). In addition, the Printing Center Complex forwarded 127 t of paper (increased by 34% compared to 2009) to the Non Governmental Organization "KLIMAKA".
- > 2010 was the first year that the "PAPIROS" information system (aiming at the electronic management of daily filing work via scanners and electronic routing of internal communications) was fully operational. The reduction of paper consumption is estimated at 356,000 pages.
- > In total printing paper consumption in 2010 reduced by 14% compared to 2009.
- > Waste Electrical & Electronic Equipment. The electrical and electronic equipment that is deemed inadequate or outdated is given to authorized companies for further processing (dismantling, recycling,

disposal, according to the nature of the material). In 2010, 138 t of waste electrical and electronic equipment forwarded to "APPLIANCES RECYCLING SA" (including of customers' waste electrical and electronic equipment as well as used mobile, fixed telephones and accessories collected through the OTEShops) for further processing, an amount that is slightly lower compared to that collected in 2009.

- > Lubricant oils and lead batteries are included in those that require special treatment (as they considered hazardous). In 2010, 12,823 kg of lubricant oils and 179,018 kg of lead batteries were collected and forwarded to authorized agencies for further treatment. In both cases, no spills were occurred.
- > Used tires management. The program for the management of the used tires from OTE owned vehicles started in 2010, during which 885 units forwarded to "ECOELASTICA SA".

In addition, OTE has put in place initiatives to raise public awareness and participation in recycling schemes. Since 2006, and more systematically since 2008, we collect, through the placement of special bins in OTEShops waste electrical and electronic waste as well as home batteries. In 2010, we collected (from our customers and employees) and forwarded to "AFIS SA" 6,100 kg of home batteries, while the total amount of home batteries collected and forward-

ed for the period 2006 – 2010 was about 21,500 kg. Our target for 2011 is, at least, to remain at 2010 levels regarding home batteries.

*For more graphs and information on Raw materials and waste management, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

# RESEARCH AND DEVELOPMENT

The development of innovative products and services, which, among others, could contribute to the improvement of the environmental performance, represents a key priority for OTE. In that context and within the 7th Framework Programme for research and technology development (FP7), we are involved in projects of a total budget of 30 million €:

- > Self-NET (“Self-Management of Cognitive Future InterNET Elements”), FP7-ICT-2007-2, Grant Agreement No.224344. For more information see [www.ict-selfnet.eu](http://www.ict-selfnet.eu).
- > FUTON (“Fibre Optic Networks for Distributed, Extendible Heterogeneous Radio Architectures and Service Provisioning”), FP7-ICT2007, Grant Agreement No.215533. For more information see [www.ict-futon.eu](http://www.ict-futon.eu).
- > REWIND (“RElay based Wireless Network and standarD”), FP7-ICT2007, Grant Agreement No.216751. For more information see [www.rewind-project.eu](http://www.rewind-project.eu).
- > CONSERN (“Cooperative aNd Self-growing Energy awaRe Networks”), FP7-ICT-2009.3.5, Grant Agreement No.257542. For more infor-

mation see [www.ict-consern.eu](http://www.ict-consern.eu).

- > WHERE2 (“Wireless Hybrid Enhanced Mobile Radio-Estimators, Phase 2”), FP7-ICT-2009-4, Grant Agreement No.248894. For more information see [www.ict-where2.eu](http://www.ict-where2.eu).

For results dissemination, OTE is participating in a number of well-established (within the wider European and international business, marketing, research and academic community) conferences. An indicative list of presentations made by OTE experts, included in conference abstracts and well received by the audience includes the following:

- > The Future Network & Mobile Summit 2010, June 16-18, 2010, Florence, Italy. Supported by the European Commission, DG Information Society and Media. Technically Co-Sponsored by IEEE.
- > The 2nd International Conference of Mobile and Lightweight Wireless Systems - MOBILIGHT 2010, May 10-12, 2010, Barcelona, Spain. Supported by the ICST – Institute for Computer Sciences, Social-Informatics and Telecommunications Engineering.

- > FITCE (Federation of Telecommunications Engineers of the European Union) 49th International Congress, "The Way of Santiago and European Telecommunications", Santiago de Compostela, Galicia, Spain, September 01-04, 2010.

# SUPPORT OF ENVIRONMENTAL INITIATIVES BY NGOs

OTE has undertaken a series of actions towards the protection of the environment for the year 2010, such as:

- > Participation of employees and their families, in an action that was planned in cooperation with the Non-Governmental Organisation 'ANIMA', for releasing hawks and other birds to the wild.
- > Participation of employees, their families, and citizens, in the context of celebrating the World Environment Day, in local actions that were carried out by OTE's 35 Cultural Centres in various areas of Greece, and which included planting trees, cleaning shores, lakes, forests etc, as well as collecting and sorting trash as recyclable and non-recyclable.
- > Contribution to raise employee awareness on environmental issues, with relevant articles in the intranet site of the company on 'Earth Hour,' 'World Environment Day', 'European Mobility Week,' ' etc.

Moreover, in 2010, OTE supported by sponsoring, the following NGOs:

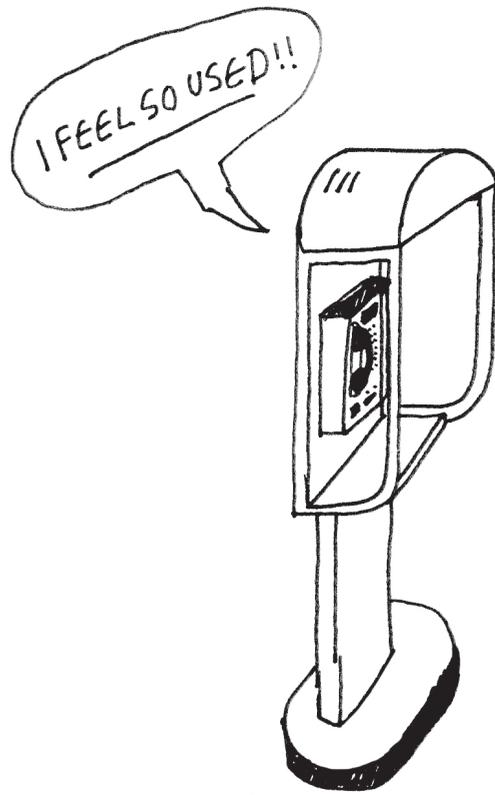
*Body*

*Type of sponsorship*

<i>Body</i>	<i>Type of sponsorship</i>
<b>CALLISTO</b> <i>Environmental organisation for wildlife and nature.</i>	<i>Support to a forest protection &amp; forest fire fighting programme in N. Pindos and Study for genetic monitoring of the brown bear through the placement of OTE poles in Rodopi, since 2009.</i>
<b>ANIMA</b> <i>Society for the Protection and Care of Wildlife.</i>	<i>In the framework of cooperation, an action has been organised for releasing birds in mount Parnitha, with the participation of employees and their families.</i>
<b>Hellenic Society for the Protection of Nature</b> <i>Non Government Organisation that has been active since 1951, for the protection of Greece's natural environment, whose mission is to inform and raise awareness on Greece's natural heritage &amp; activities for its protection.</i>	<i>Continue supporting the Environmental training &amp; awareness Programme: 'New Journalists for the Environment'.</i>
<b>The Hellenic Society for the Protection of the Environment and the Cultural Heritage.</b>	<i>Support of the activities of the society in the last 4 years.</i>
<b>The Union for the Protection of Forests in Athens (Philodassiki Enossi Athinon).</b>	<i>Support the Union's project plans (reforestations, development of the Botanical Garden).</i>

- LONG DISTANCE PHONE -





# BUILDING TIES WITH SOCIETY

OTE, acting as a 'responsible active citizen' towards society, has been tangibly demonstrating its concern for society, throughout the years and with consistency, and gives back to society its best, expanding its actions and initiatives for the preservation and protection of social cohesion. OTE applies its societal engagement strategy across its nationwide operations in Greece.

OTE actions for society contribute to:

- > Supporting children, vulnerable social groups and youths
- > Helping youths gain access to new technologies
- > Supporting and promoting volunteerism
- > Educating the public on the history and future of telecommunications and communications technology
- > The preservation and promotion of our cultural heritage, with an emphasis on cultural initiatives of the Periphery.

# SUPPORTING CHILDREN, VULNERABLE SOCIAL GROUPS & YOUTHS

Through its social marketing and sponsorships, OTE, consistently and continuously, provides financial support to bodies with a proven track record of child support activities.

OTE also provides support to vulnerable social groups and youths through sponsorship activities, telemarathons, phonecards, helplines and other actions.

## **SOCIAL MARKETING**

Since 2003, OTE has been donating a significant part of the revenue generated from its **Christmas campaign**, for assisting charity organisations. In 2010, the amount of EUR200,000, which was generated from purchases made at OTESHOP stores, through the 13888 number or oteshop.gr during the 2010-2011 Christmas season, was given to help the goals of Charity organisations such as the Association '**The Smile of the Child**', the charity caring for people with Neuromuscular Conditions, **MDA Hellas** and the Union '**Together for Children**'.

*For more information on OTE's Social Marketing, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

## SUPPORTING CHILDREN CHARITIES

The following table summarises OTE sponsorship activities for 2010, regarding **Children Charities**, through the following bodies and non-governmental organisations that OTE included in its Corporate Responsibility programme.

<i>Body</i>	<i>Form of sponsorship</i>
<i>Cerebral Palsy Greece*</i>	<i>Covered the annual operating costs of its IT Training Unit (personnel payroll, purchase of training material and equipment maintenance).</i>
<i>MDA Hellas*</i>	<i>Support for the creation of the association's 'Youth Centre', aiming at providing comprehensive services, aside from the services provided through the 3 MDA Units at hospitals, as well as at the better social integration of patients, by attracting Members &amp; Volunteers to the premises of the Centre.</i>
<i>Hellenic Society for Disabled Children(ELEPAP)</i>	<i>Coverage of operating expenses for the creation of a «New Department for Early Training &amp; Therapeutic Intervention – Special Pre-school Education Unit» of ELEPAP.</i>
<i>Friends of the Child*</i>	<i>Covered special treatment -speech therapy, psychotherapy- on a monthly basis for one child, covered check-up and vaccination for 80 children and expenses for a Bazaar (canteen hire and sacks).</i>
<i>'AGIA SOFIA' Children's Hospital</i>	<i>Sponsorship of an academic Forum on Paediatric Haematology – Oncology, for briefing the medical community on new developments and treatments in this field.</i>
<i>Association of OTE Employees and Pensioners with disabled children</i>	<i>Supported financially the Association's work for organizing events for the children throughout Greece.</i>
<i>Special Treatment Centre 'Margarita'</i>	<i>During 2010, OTE provided support regarding:</i> <ul style="list-style-type: none"> <li><i>-Upgrades to computers used by students of the centre</i></li> <li><i>- Computer network maintenance</i></li> <li><i>-Website operating expenses</i></li> </ul>

NEW

\* The above sponsorship activities are separate from the support through the Christmas campaign funds.

## SUPPORTING VULNERABLE SOCIAL GROUPS

The following table summarises OTE sponsorship activities for 2010, regarding **vulnerable social groups**, through the following bodies and non-governmental organisations that OTE included in its Corporate Responsibility programme:

<i>Body</i>	<i>Form of sponsorship</i>
<i>Food Bank – Foundation for fighting hunger</i>	<i>Coverage of the Foundation’s operating needs and purchase of food for 2,857 homeless people that are given food at 37 food halls and Foundations in Attica.</i>
<i>Hellenic Cancer Society</i>	<i>Procurement of scientific instruments for the ‘Centre for the Early Diagnosis of Cancer’ (Full Dermatoscope System, procurement of 3 heads for the ultrasound tomography scanner).</i>
<i>Doctors of the Aegean</i>	<i>Boost, for a fifth consecutive year, the humanitarian missions of these doctors to remote border islands.</i>
<i>‘STROFI’ Rehabilitation Community Family Association, of the Treatment Clinic for Addicts (KETHEA)</i>	<i>Covered the expenses for the children’s graduation ceremony from the KETHEA programmes, for the entire country and covered the expenses for the Association’s Christmas bazaar. Granted a scholarship to a programme graduate.</i>
<i>Festival for Homeless People</i>	<i>Supported the 8th Homeless World Cup, Rio de Janeiro, Brazil.</i>
<i>Emotion Pictures</i>	<i>During 2010, OTE supported the International Festival on ‘Documentary &amp; Disability’ (presentation of the innovative ‘EyeWriter Initiative’ device for authors &amp; artists with paralysis).</i>

NEW

Furthermore, in 20 **tele-marathons** (compared to 14 in 2009) that were carried out with a special pricing policy through the Televoting-IN service for charity purposes, OTE donated EUR76,510 (compared to EUR206,250 in 2009). This service was indicatively made available to bodies such as, the ‘the Child’s Smile’ organisation, the Greek National Committee of “Unicef” and the Association ‘Doctors without frontiers’. The decreased income is attributed to the decline in the activity of the service in general.

Also, within 2010, 2,940 **phone cards** (with a total value of EUR12,300) were given to organisations such as the Greek Red Cross, the Hellenic Centre for Infectious Diseases Control (H.C.I.D.C.), ‘KETHEA DIAVASI’, Special Juvenile Correctional Facilities, etc.

## HELPLINES

Furthermore in 2010, OTE provided telecommunication infrastructure and financial support to the operation of the following helplines for children, youth and vulnerable groups:

- > The Greek National Helpline for children “SOS 1056” of the ‘The Smile of the Child’ association
- > The European Hotline for missing children “1 16000”, of the ‘The Smile of the Child’ association
- > Advice Helpline ‘11525 Together for Children’, by the Union ‘Together for Children’
- > European “Helpline 116111 for support to Children and Youth”, by the Association for the Psychosocial Health of Children and Teenagers (A.P.H.C.A.)
- > ‘YpoSTIRIZO’ (I SUPPORT) Hel-

pline number 80011 80015 in cooperation with the Adolescent Health Unit (AHU) of the 2nd Department of Paediatrics, University of Athens, at the ‘P. & A. KYRIAKOU’ Children’s Hospital

- > National Suicide Prevention Hotline 1018, in the framework of services provided by the ‘KLIMAKA’ NGO.

*For more information on OTE’s support to vulnerable social groups, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*



## OTE SUPPORTS SPECIAL OLYMPICS WORLD SUMMER GAMES ATHENS 2011

In the framework of the corporate responsibility actions, OTE and COSMOTE contribute in practice, by providing all telecommunication services that will be required before and during the games, aiming at the impeccable hosting of the games.

From as early as Spring 2010, we have begun the implementation of this important project, thus contributing to the success of the Games’ test events.

In particular, we will cover the Games’ telecommunication needs for:

- > Data transmission services
- > Audio and video transmission services
- > Mobile telephony services.

The above infrastructure is provided in goods and its cost amounts, for both OTE and COSMOTE, to approximately EUR1,600,000.

*For more information on OTE’s support to the Special Olympics games, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

## **SUPPORTING YOUTHS AND PROMOTING THEIR TECHNOLOGY SKILLS**

Consistent with its strategy to promote new technologies and to support efforts made by youths during their studies, OTE in 2010 implemented a series of actions intended to inform and familiarise the public with the Internet and especially with the broadband services, specifically:

- > Gave the opportunity to 907 students (compared to 693 in 2009) to complete their studies through internships in a modern work environment at OTE, in cooperation with the academic community and the public bodies (e.g. OAED schools).
- > 1,745 students (compared to 2,207 in 2009) were employed at call centres, of which 350 are members of large or single parent families.
- > For the sixth consecutive year, OTE offered free 'Conn-x' broadband connections to excelling undergraduate and postgraduate students.
- > Continued and extended until 2015, jointly with COSMOTE (AMC) and ROMTELECOM, the support provided to the Scholarship Programme of the American Farm School of Thessalonica.
- > OTE awarded with a scholarship, for the third consecutive year, two post-graduate students with excellent academic performance of the Department of Banking and Financial Administration of the University of Piraeus, for the academic year 2009-2010.
- > Expanded its cooperation with the Adolescent Health Unit (AHU) of the 2nd Department of Paediatrics, Athens University, at the 'P. & A. Kyriakou' Children's Hospital aiming to implement an integrated program fostering information/awareness and education among the public and primarily children, teenagers and their parents, on the safe and responsible use of the Internet.
- > Supported, for the seventh consecutive year, the Pan-Hellenic School Contest 'LISIAS,' which has become a well-established institution under the auspices of the Ministry of Education, Life-long Learning and Religion, that is organised by 'Douka' School and conducted through the Internet, offering knowledge and entertainment through the use of technology. OTE offered Conn-x broadband connections to the winners, as well as providing technical/material infrastructure, for the duration of the contest.
- > For the 2nd consecutive year, OTE sponsored the Pan-Hellenic Information Technology Competition, by offering the 50 winners of the competition's first phase the popular Conn-x package for broadband

internet access.

- > The 'Computer Re-Use Programme' spanning the entire country was continued for the 5th year, promoting the reuse of computers and other technological equipment, by offering 55 PCs (compared to 106 in 2009) to schools and different bodies performing social work.

*For more information on Supporting Youths and Promoting their Technology Skills, visit: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

# CORPORATE VOLUNTEERING

## OTE'S EMPLOYEE VOLUNTEERISM PROGRAMME WITH NGOs

In 2010, we further expanded the OTE Employee Volunteerism Programme, to support the actions of Non-Governmental Organisations. This Programme provides company employees with the opportunity to participate in actions of associations that require volunteers.



In the framework of this Programme, we implemented new actions that contribute both to cultivating a culture of employee volunteerism and environmental awareness:

- > Through the company's intranet (U Link), the employees had the possibility to participate, both themselves and their families, in an action that was planned in cooperation with the Non-Governmental Organisation 'ANIMA', for releasing hawks and other birds to the wild, proving that way that even a small action can make a difference.
- > In the context of celebrating the World Environment Day, OTE employees and their families, as well as

citizens, took action for the environment by participating in local actions that were carried out by OTE's 35 Cultural Centres in various areas of Greece, and which included planting trees, cleaning shores, lakes, forests etc, as well as collecting and sorting trash as recyclable and non-recyclable.



## OTE'S EMPLOYEE VOLUNTEERISM PROGRAMME FOR THE SPECIAL OLYMPICS WORLD SUMMER GAMES ATHENS 2011

In the framework of the OTE's Employee Volunteerism Programme, as well as OTE's sponsorship of the Special Olympics World Summer Games ATHENS 2011, we created a special corporate programme for volunteer participation in the Games by company employees. Employees from all over Greece responded and participate in the OTE Volunteer Group, thus contributing to the understanding and acceptance of mental disability and promoting the idea of volunteerism, representing the company in these World Games.

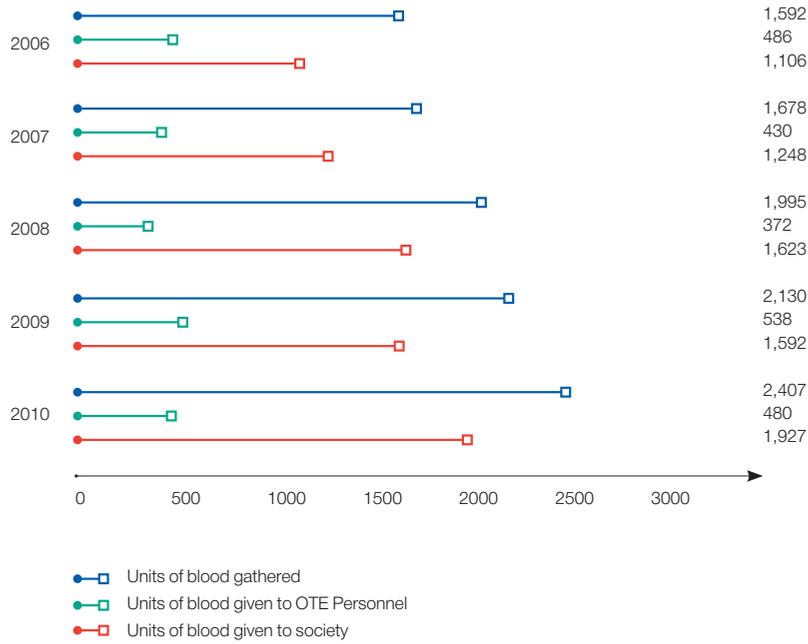
## **BLOOD DONATION**

Blood donations by OTE employees, which is the utmost act of human kindness and solidarity, increased in 2010.

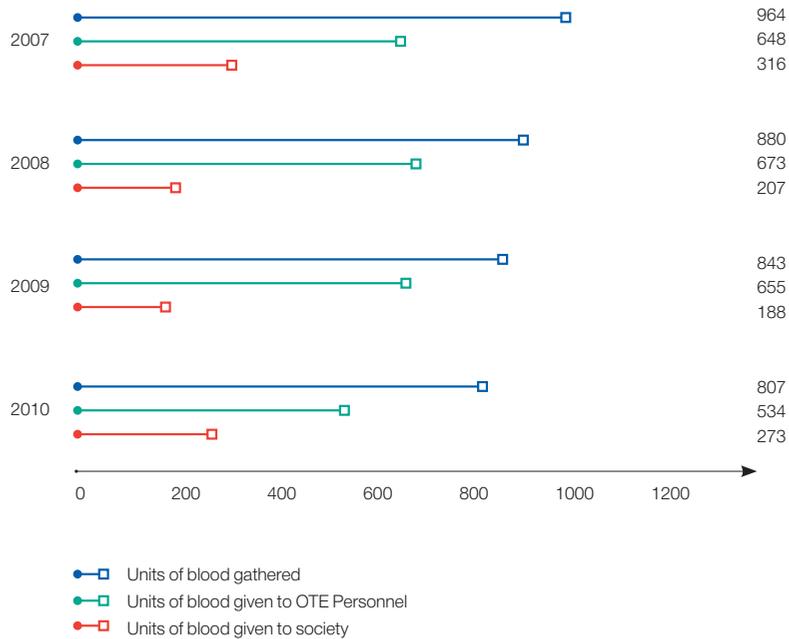
For 2010, throughout the country, the OTE Group employees gathered 3,214 units of blood (compared to 2,973 in 2009), of which 2,407 was donated in Attica. 1,014 units were used to cover the needs of OTE Group employees, while 2,200 blood units were given to society.

In the Periphery, the work of Blood donation is organised in coordination with the local OTE Employee Cultural Centres.

The following graphs show the development of the OTE Employee Volunteer Blood Donation Programme in Attica and in the Periphery during the years:



### Blood Donation Prefecture of Attica



### Blood donation in the Periphery

# CULTURAL HERITAGE - LOCAL COMMUNITIES

OTE consistently supports actions that contribute towards the enhancement of cultural heritage. In that framework, OTE maintained its longstanding relationship and collaboration with the following entities into 2010:

- > Benaki Museum
  - Digitisation & archiving of Museum collections
  - "Dimitris Pikionis, 1887-1968", an exhibition dedicated to the artist's work.
- > Hellenic Foundation for European & Foreign Policy (ELIAMEP)
- > The Society for the Study of Greek History (EMEIS)
- > Museum of Photography, Thessaloniki
  - Support of the Photobiennale 2010 (21st International Photography Meeting with the central topic "Place").
- > Athens Municipality
  - Installation of visual art works for Regeneration of the Psirri District.

## **ACTIONS AND INITIATIVES IN THE PERIPHERY**

OTE tangibly demonstrates its concern for local communities, by participating and supporting an array of activities throughout Greece.

Indicatively:

- > Thessalonica: World Council of Hellenes Abroad
- > Agrinio: Hellenic Society for Disabled Children (ELEPAP), Agrinio Branch
- > Cyclades: "Small-island Celebrations"
- > Tinos: Festival of the Exomvourgo Municipality (5th consecutive year)
- > Simi: Festival of the Simi Municipality (6th consecutive year)
- > Patras: "12th International Panorama of Independent Cinema & Video-Art Creators"
- > Komotini: "Eleftheria of Thrace" (5th consecutive year)
- > Siros: "Ermoupolia" Festival, 2010
- > Xanthi: "Old Town Celebrations" (5th consecutive year).

## OTE TELECOMMUNICATIONS MUSEUM

In 2010, the OTE Telecommunications Museum completed twenty years of existence. It was created through the hard work of its employees and the company's support. By operating the only Telecommunications Museum in Greece, OTE responsibly manages its corporate heritage.

Currently, the OTE Telecommunications Museum is focusing its efforts on educating and entertaining the largest possible number of visitors. Admission and tours in the Museum are free of charge to the public.

Museum's Visitors:

- > School Groups
- > Special Groups
- > Individual Visitors

### *Highlights of the Museum's Activities in 2010*

An array of new activities has been launched, in order to target new audience categories. The principal among them are provided below:

- > The launch of the digital mosaic depicting Graham Bell, inventor of the telephone, made from dozens of exhibits from its collections.
- > The organisation of information sessions, addressed to children and adults, on the subject of safe Internet.
- > The first themed educational programme on telecommunications, for children aged 5-8, titled 'Children's Visual Arts Studio on Telecommunications', (participation of 230 children, among which children from the "Pammakaristos" Special School, during November & De-

ember 2010).

- > Participation of the Museum in the Museum Walk, which was organised in the framework of the Athens International Film Festival.

*For more information on the OTE Telecommunications Museum visit: <http://www.ote.gr/portal/page/portal/OTEGR/TheCompany/MuseumOfTelecommunications> or [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)*

## OTE SPONSORSHIP AND CORPORATE RESPONSIBILITY ACTIONS EXPENSES

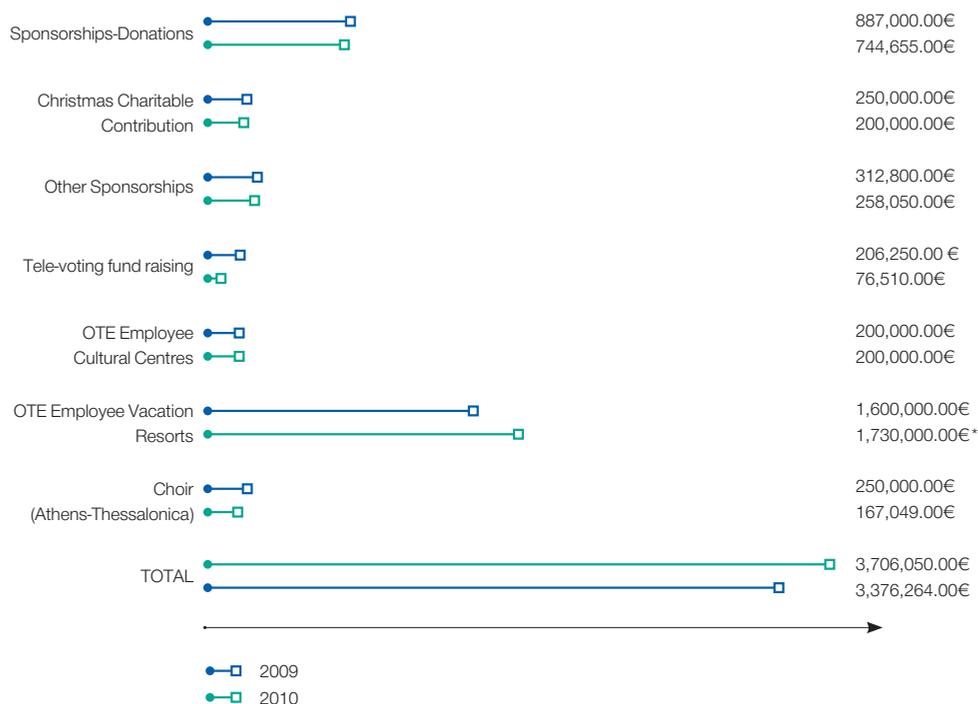
In 2010, the total amount spent on sponsorships/donations and other telecommunication expenses reached EUR1,202,705.00, from which EUR944,655.00 has been made available for Corporate Responsibility actions, that is 78,5% of the total amount.

Specifically, OTE expenses for Corporate Responsibility actions and sponsorships are set forth below:

### OTE website ([www.ote.gr](http://www.ote.gr)) & CR – Online CR Report 2010

Corporate Responsibility actions are presented in a specific section of OTE’s website (<http://www.ote.gr/portal/page/portal/OTEGR/CorporateSocialResponsibility/OurCRProgram>)

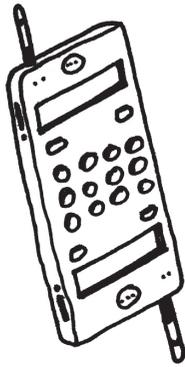
In 2010, the company, for the first year, has launched a dedicated micro-site, where it posted, in an interactive way, the “2009 Corporate Responsibility Report”. This year, the CR Report will be once again online ([www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en)), but will be integrated in the actual structure of the official website ([www.ote.gr](http://www.ote.gr)).



\* The amount of 1,730,000.00 € includes: 930,000.00 €, an amount related to FY2009.

### OTE Expenses for Corporate Responsibility Actions and Sponsorships





COOL!!!  
YES, I KNOW!!!

# UNITED NATIONS GLOBAL COMPACT COMMUNICATION ON PROGRESS (COP), 2010

*“Our company is proud to continue for another year to abide by the principles of the UN’s Global Compact. The UN’s encouragement through this vital initiative provides a most welcomed guidance and commitment for our organization. OTE has chosen to support and uphold the UNGC’s principles in its internal operations as well as in its relations with external stakeholders.”*

**Mr Michalis Tsamaz, Chairman and CEO, OTE SA**

OTE SA –with operations principally in Greece– supports the UN Global Compact, the largest voluntary corporate citizenship initiative in the world and abides by its ten universal values in the areas of human rights, labor standards, the environment and anti-corruption. OTE has integrated the Global Compact principles into its policies and operations.

Our Corporate Responsibility Report for 2010, also available in an online version in the URL: [www.ote.gr/cr2010/cr2010\\_en](http://www.ote.gr/cr2010/cr2010_en), includes a detailed presentation of the company’s priorities, activities, goals and outcomes, structured in a four pillar approach of “Building Ties” with our employees, in the market, for the environment, and with society.

During 2010 our main achievements relevant to adherence to Global Compact principles include:

- > Extending further our efforts to record, measure and gradually reduce the company’s “ecological footprint”.
- > At the most challenging period for Greece economically, OTE is one of the key drivers for growth and investment in new technologies and infrastructure. OTE’s milestone goal for broadband development in the whole of the country remains a key priority, while placing special emphasis on bridging the digital gap in remote areas of the country and facilitating access to new technologies for vulnerable social groups. In 2010 OTE focused also on actively promoting the better and safer use of new technologies.
- > Continuing our long-term commitment to children, young people and students, as well as the elderly and people with disabilities, through forming partnerships and supporting NGOs that are dedicated to helping these social groups.

- > Enhancing policies and practices that secure our employees' well-being and development, while respecting and implementing equal opportunity and human rights policies.
- > Upholding a company-wide ethics and anti-corruption policy and supporting mechanisms that promote transparent and responsible business conduct.

The full length of the justification for the 10 Global Compact Principles can be found in the online CR Report  
([www.ote.gr/gr2010/cr2010\\_en](http://www.ote.gr/gr2010/cr2010_en))

*UN Principles*

*OTE policies and practiles*

*COP Index - Section 2010 CR Report*

<p>1. Businesses should support and respect the protection of internationally proclaimed human rights.</p>	<p>Granting opportunities to all employees and full respect of human rights is an active policy at OTE. The company has set an internal regulatory framework for the protection of employee rights, including the Internal Personnel Regulation, the company's Code of Conduct and the 'Compliance Management System'.</p>	<p>Employees: Equal Opportunities &amp; Non-Discrimination - Basic and Additional Benefits - Recruitment and Termination - Special Hires <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a></p>
<p>2. Make sure that they are not complicit in human rights abuses.</p>	<p>The new Procurement policy has increased control mechanisms for OTE suppliers and supply chain.</p>	<p>Marketplace: Procurement Policy <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a></p>
<p>3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.</p>	<p>The Internal Personnel Regulation states that freedom of political and philosophical beliefs are respected and ensured by the Company in the context determined by the Constitution and the Legislation. In practice the right to collective negotiations is upheld and protected in the best possible manner. All Company employees, without exception, are covered by agreements based on collective negotiations</p>	<p>Employees: Equal Opportunities &amp; Non-Discrimination <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a> Stakeholder Table: Employees/Labour Unions <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a></p>
<p>4. The elimination of all forms of forced and compulsory labour.</p>	<p>OTE's Employment policies and Internal Personnel Regulation prevent and prohibit forced labour. In addition, the new OTE Procurement policy has increased control mechanisms for OTE suppliers.</p>	<p>Employees: Equal Opportunities &amp; Non-Discrimination Marketplace: Procurement Policy <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a></p>
<p>5. The effective abolition of child labour.</p>	<p>OTE's Employment policies and Internal Personnel Regulation prevent and prohibit phenomena such as child labour. Additionally, the new OTE Procurement policy has increased control mechanisms for OTE suppliers.</p>	<p>Employees: Equal Opportunities &amp; Non-discrimination Marketplace: Procurement Policy <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a></p>
<p>6. The elimination of discrimination in respect of employment and occupation.</p>	<p>At OTE, there is no pay discrimination of any kind based on gender. The employees' basic salary is calculated</p>	<p>Employees: Equal Opportunities &amp; Non-discrimination</p>

*UN Principles*

*OTE policies and practices*

*COP Index - Section 2010 CR  
Report*

	<p>on length of service and educational level. OTE implements equal opportunities policies and transparent employee evaluation systems.</p>	<p>Employees: Employee Evaluation System <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a></p>
<p>7. Businesses should support a precautionary approach to environmental challenges.</p>	<p>OTE supports the precautionary principle by taking a proactive approach to measuring and reducing its environmental impact.</p>	<p>Environment: Our Environment Policy Measuring and reporting our Environmental impact and initiatives <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a></p>
<p>8. Undertake initiatives to promote greater environmental responsibility.</p>	<p>Recording of ecological footprint and initiatives to save energy and reduce CO<sub>2</sub> emissions.</p>	<p>Environment: Environmental impacts from the operation of OTE in Greece Measures for reducing energy use and GHG emissions <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a></p>
<p>9. Encourage the development and diffusion of environmentally friendly technologies.</p>	<p>OTE promotes the use of wind turbines and photovoltaic systems in infrastructure projects, energy saving technologies in its operational buildings including telecommunication equipment.</p>	<p>Environment - Renewable Energy Sources Energy conservation <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a></p>
<p>10. Businesses should work against corruption in all its forms, including extortion and bribery.</p>	<p>OTE's Corporate Governance policy includes specific control measures to prevent bribery and corruption. The policy includes implementation bodies and mechanisms such as the Management Bodies, an Audit Committee, the Audit Procedures, and a whistle-blowing policy.</p>	<p>Corporate Governance Training Programmes <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a> and IR website: <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/apologismose-tairikisdiak">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/apologismose-tairikisdiak</a></p>
<p>Contributing to broader development goals</p>	<ul style="list-style-type: none"> <li>▪ OTE is making a decisive contribution to building Greece's broadband infrastructure and services, including making sure everyone in the country (remote areas, vulnerable groups) are reached in this effort.</li> <li>▪ In 2010 OTE has systemised and increased its actions to promote the right and safer use of the internet.</li> <li>▪ OTE has formed several long-term partnerships with NGOs to help children in need, students, the elderly and the disabled to have a better future and when applicable use new technologies to improve their lives.</li> </ul>	<p>Marketplace: Products-Services for Special Groups Society: Support for Children, Socially Vulnerable groups and Youths &amp; Promoting their Technology Skills <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a> Marketplace: Educating citizens about broadband and new technologies - Internet Safety Society: Support for Children, Socially Vulnerable Groups and Youths &amp; Promoting their Technology Skills <a href="http://www.ote.gr/gr2010/cr2010_en">www.ote.gr/gr2010/cr2010_en</a></p>

# GRI INDEX TABLE FOR 2010 CR REPORT

The full length of the justification for the GRI indicators can be found in the online CR Report

[www.ote.gr/gr2010/cr2010\\_en](http://www.ote.gr/gr2010/cr2010_en)

*Indicators and Description*

*2010 CR Report*

*OTE websites*

<i>1. Company profile</i>		
<i>1.1 Statement from the most senior decision maker of the organisation.</i>	<i>(Fully) Message from the Chairman &amp; CEO</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>1.2 Description of key impacts, risks and opportunities.</i>	<i>(Fully) CR &amp; Business Strategy - Vision, Mission &amp; Business Strategy CR Goals Results Commitments</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>2. Organisational Profile</i>		
<i>2.1 Name of the organisation.</i>	<i>(Fully) OTE</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>2.2 Primary brands, products, and/or services.</i>	<i>(Fully) OTE</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>2.3 Operational structure of the organisation, including main divisions, operating companies, subsidiaries, and joint ventures.</i>	<i>(Fully) OTE – OTE Group</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations – Business Overview – Organization Chart <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/BusinessOverview/OrganizationalStructure/GroupStructure">http://www.ote.gr/portal/page/portal/InvestorRelation/BusinessOverview/OrganizationalStructure/GroupStructure</a>
<i>2.4 Location of organisation's headquarters.</i>	<i>(Fully) OTE</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>2.5 Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.</i>	<i>(Fully) OTE</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations – Business Overview – What We Do <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/OTEIRMainPage">http://www.ote.gr/portal/page/portal/InvestorRelation/OTEIRMainPage</a>
<i>2.6 Nature of ownership and legal form.</i>	<i>(Fully) OTE</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations – Shareholder Structure <a href="http://www.ote.gr/portal/">http://www.ote.gr/portal/</a>

<i>Indicators and Description</i>	<i>2010 CR Report</i>	<i>OTE websites</i>
		<a href="http://www.ote.gr/page/portal/InvestorRelation/TheShare/ShareholderStructure">page/portal/InvestorRelation/TheShare/ShareholderStructure</a>
2.7 Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	(Fully) OTE	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations – Business Overview – Who We Are <a href="http://www.ote.gr/page/portal/InvestorRelation/BusinessOverview/WhoWeAre/OTEToday">http://www.ote.gr/page/portal/InvestorRelation/BusinessOverview/WhoWeAre/OTEToday</a>
2.8 Scale of the reporting organisation.	(Fully) OTE	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and <a href="http://www.ote.gr/page/portal/InvestorRelation/OTEIRMainPage/OTE_OIKONOMIKES_KATASTASEIS_IFRS_Q4_2010_GREEK_home.pdf">http://www.ote.gr/page/portal/InvestorRelation/OTEIRMainPage/OTE_OIKONOMIKES_KATASTASEIS_IFRS_Q4_2010_GREEK_home.pdf</a>
2.9 Significant changes during the reporting period regarding size, structure, or ownership.	(Fully) OTE – Key Business Developments	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
2.10 Awards received in the reporting period.	(Fully) CR & Business Strategy-Distinctions	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<b>3. Report Parameters</b>		
3.1 Reporting period for information provided.	(Fully) Regarding this Report	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
3.2 Date of most recent previous report.	(Fully) Regarding this Report	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and <a href="http://www.ote.gr/page/portal/OTEGR/CorporateSocialResponsibility/corporateresponsibilities">http://www.ote.gr/page/portal/OTEGR/CorporateSocialResponsibility/corporateresponsibilities</a>
3.3 Reporting cycle.	(Fully) Regarding this Report	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
3.4 Contact point for questions regarding the report or its contents.	(Fully) Regarding this Report	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
3.5 Process for defining report content.	(Fully) Regarding this Report CR& Business Strategy–CR Certifications and Indexes – AA1000	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
3.6 Boundary of the report	(Fully) Regarding this Report	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
3.7 State any specific limitations on the scope or boundary of the report	(Fully) Regarding this Report	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
3.8 Basis for reporting on joint	(Fully) Regarding this Report	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>

<i>Indicators and Description</i>	<i>2010 CR Report</i>	<i>OTE websites</i>
ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	(Fully) <i>Subsidiary Companies</i>	
3.9 Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	(Partially) <i>Environment - Measuring and reporting our Environmental impact and Initiatives</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
3.10 Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g. mergers/ acquisitions, change of base years/periods, nature of business, measurement methods).	(Fully) <i>Marketplace – Payments by OTE &amp; Subsidiaries– Recalculation of 2009 data</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
3.11 Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	(Fully) <i>Marketplace – Payments by OTE &amp; Subsidiaries– Recalculation of 2009 data</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
3.12 Table identifying the location of the Standard Disclosures in the report.	(Fully) <i>GRI Index</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
3.13 Policy and current practice with regard to seeking external assurance for the report.	(Fully) <i>Regarding this Report CR &amp; Business Strategy – CR Certifications – External Assurance</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<b>4. Governance</b>		
4.1 Governance structure of the organisation, including Committees under the highest body, their mandates and membership, and data on age and gender of members	(Fully) <i>OTE - Corporate Governance</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and <i>Investor Relations – Corporate Governance - Board of Directors:</i> <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/composition">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/composition</a> <i>Management Team</i> <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/ektelestikidioikisi/melidioikisis">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/ektelestikidioikisi/melidioikisis</a> and <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/">http://www.ote.gr/portal/page/portal/InvestorRelation/</a>

Indicators and Description

2010 CR Report

OTE websites

Indicators and Description	2010 CR Report	OTE websites
<p>4.2 Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organisation's management and the reasons for this arrangement).</p>	<p>(Fully) OTE - Corporate Governance CR &amp; OTE Management</p>	<p><a href="#">CorporateGovernance/BoardofDirectors/roloskaiarmodiotites</a>  <a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations – Corporate Governance – Board of Directors <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/composition">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/composition</a> - <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/roloskaiarmodiotites">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/roloskaiarmodiotites</a></p>
<p>4.3 For organisations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.</p>	<p>(Fully)</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations -Board of Directors – Composition <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/composition">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/composition</a></p>
<p>4.4 Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.</p>	<p>(Fully) OTE - Corporate Governance</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations – Corporate Governance section <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/OurPrinciples">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/OurPrinciples</a></p>
<p>4.5 Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance).</p>	<p>(Fully)</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations – Corporate Governance (<a href="http://www.ote.gr/investor/Uploads/draftserviceagreementeng.pdf">http://www.ote.gr/investor/Uploads/draftserviceagreementeng.pdf</a>)</p>
<p>4.6 Processes in place for the highest governance body to ensure conflicts of interest are avoided.</p>	<p>(Fully) OTE - Corporate Governance</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations – Corporate Governance – Principles and Framework of Corporate Governance <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/OurPrinciples">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/OurPrinciples</a></p>
<p>4.7 Process for determining the composition, qualifications and expertise of the members of the highest governance body for guiding</p>	<p>(Fully)</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations Site – Corporate Governance – Board of Directors – Composition <a href="http://www.ote.gr/">http://www.ote.gr/</a></p>

<i>Indicators and Description</i>	<i>2010 CR Report</i>	<i>OTE websites</i>
<i>the organisation's strategy, including consideration to gender and diversity.</i>		<a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/compositionN">portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/compositionN</a>
<i>4.8 Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.</i>	<i>(Fully) CR &amp; Business Strategy</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and <i>Investor Relations – Corporate Governance - Transparency &amp; Information Disclosure</i> <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/OurPrinciples">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/OurPrinciples</a>
<i>4.9 Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.</i>	<i>(Fully) CR &amp; Business Strategy – CR &amp; OTE Management</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/OTEIRMainPage/OTE_OIKONOMIKES_KATASTASEIS_IFRS_Q4_2010_GREEK_home.pdf">http://www.ote.gr/portal/page/portal/InvestorRelation/OTEIRMainPage/OTE_OIKONOMIKES_KATASTASEIS_IFRS_Q4_2010_GREEK_home.pdf</a>
<i>4.10 Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.</i>	<i>(Fully)</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and <i>Corporate Governance – Board of Directors – Board of Directors Committees</i> ( <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/epitropesds">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/epitropesds</a> )
<i>4.11 Explanation of whether and how the precautionary approach or principle is addressed by the organisation.</i>	<i>(Fully) CR &amp; Business Strategy – CR &amp; OTE Management</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>4.12 Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses.</i>	<i>(Fully) CR &amp; Business Strategy – Participations</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>4.13 Memberships in associations (such as industry associations) and/or national/international advocacy organisations.</i>	<i>(Fully) CR &amp; Business Strategy – Participations Marketplace – National &amp; International Co-operations</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>4.14 List of stakeholder groups engaged by the organisation.</i>	<i>(Fully) CR &amp; Business Strategy – Stakeholders</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>

<i>Indicators and Description</i>	<i>2010 CR Report</i>	<i>OTE websites</i>
4.15 Basis for identification and selection of stakeholders with whom to engage	(Fully) CR & Business Strategy – Certifications & Indices – AA1000 Principles	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
4.16 Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	(Fully) CR & Business Strategy – Stakeholders Table	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
4.17 Key topics and concerns that have been raised through stakeholder engagement and how the organization has responded to those key topics and concerns, including through its reporting.	(Fully) CR & Business Strategy – Stakeholders Table	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<b>Report on the disclosures of Management approach for each category</b>		
<b>Disclosure on Management Approach EC (Fully)</b>	Vision, Mission & Business Strategy Goals Results Commitments Table - Building Ties with the Marketplace	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
Economic performance	(Fully) OTE- About OTE Goals Results Commitments Table – Marketplace	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
Market presence	(Fully) OTE – About OTE	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
Disclosure on Management Approach EN (Partially)	Goals Results Commitments Table – Environment Building ties with Environment	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
Materials	(Partially) Environment – Building ties with the Environment – Raw materials and waste management	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
Energy	(Fully) Environment – Energy consumption	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
Water	(Fully) Environment – Water consumption	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
Emissions, effluents and waste	(Fully) Environment- Waste Management - Road transportation activity of OTE owned vehicles fleet - Solid waste disposal	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
Products and services	(Fully) Environment- Renewal of other equipment and vehicles fleet - Reduction of road transportation activity - Paper recycling	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>

<i>Indicators and Description</i>	<i>2010 CR Report</i>	<i>OTE websites</i>
<i>Compliance</i>	<i>(Fully) Environment- Building ties with the Environment</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Transport</i>	<i>(Fully) Environment - Road transportation activity of OTE owned vehicles fleet - Leased vehicles for the transportation of executives / employees - Business air travels abroad</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Overall</i>	<i>(Partially) Environment- Building ties with the Environment</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<b><i>Disclosure on Management Approach LA (Fully)</i></b>	<i>Employees - Building Ties with Our Employees - Health &amp; Safety - Equal Opportunities and non-discrimination - Special hires</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Employment</i>	<i>(Fully) Employees - Quality Management Systems (QMS) - Equal Opportunities and non-discrimination</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Labor/management relations</i>	<i>(Fully) Employees - Equal Opportunities and non-discrimination</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Occupational health and safety</i>	<i>(Fully) Employees -Health &amp; Safety</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Training and education</i>	<i>(Fully) Employees -Special hires</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Diversity and equal opportunity</i>	<i>(Fully) Employees - Equal Opportunities and non-discrimination</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Equal remuneration for women and men</i>	<i>(Fully) Equal Opportunities and non-discrimination</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<b><i>Disclosure on Management Approach HR (Partially)</i></b>	<i>Employees-Equal Opportunities and non-discrimination Marketplace - Procurement Procedures</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Investment and procurement practices</i>	<i>(Partially) Marketplace-Procurement Procedures – Contracting</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Non-discrimination</i>	<i>(Fully) Employees - Equal Opportunities and non-discrimination</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Freedom of association and collective bargaining</i>	<i>(Fully) Employees - Equal Opportunities and non-discrimination</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Child labor</i>	<i>(Fully) Employees - Equal Opportunities and non-discrimination</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>

<i>Indicators and Description</i>	<i>2010 CR Report</i>	<i>OTE websites</i>
<i>Prevention of forced and compulsory labor</i>	<i>(Fully) Employees - Equal Opportunities and non-discrimination</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<b>Disclosure on Management Approach SO (Partially)</b>	<i>Building Ties with Society - Building Ties with the Marketplace – Corporate Governance</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Local communities</i>	<i>(Partially) Goals-Results - Commitments - Society - Building Ties With Society</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Corruption</i>	<i>(Fully) CR and Business Strategy Employees - Special hires - Training Programmes</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Public policy</i>	<i>(Partially) Marketplace - Participation in European and International Policy Forums</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Anti-competitive behavior</i>	<i>(Fully) Marketplace - Regulatory Litigations</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Compliance Management System</i>	<i>(Fully) OTE Compliance Management System</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<b>Disclosure on Management Approach PR (Partially)</b>	<i>Marketplace –Products for Special Groups Marketplace - Product Responsibility &amp; Marketing – Other products</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Customer health and safety</i>	<i>(Partially) Marketplace - Internet Safety - Product Responsibility and Marketing Issues</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Product and service labeling</i>	<i>(Fully) Marketplace - Product Responsibility and Marketing Issues</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Marketing communications</i>	<i>(Fully) Marketplace - Product Responsibility and Marketing Issues</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Customer privacy</i>	<i>(Fully) Marketplace - Data Security &amp; Privacy</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<i>Compliance</i>	<i>(Partially) Marketplace - Product Responsibility and Marketing Issues</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<b>Performance Indicators</b>		
<b>Economic</b>		
<i>ECI Direct economic value</i>	<i>(Fully) Marketplace – Payments by</i>	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>

*Indicators and Description*

*2010 CR Report*

*OTE websites*

<p>generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.</p>	<p>OTE &amp; Subsidiaries</p>	<p>and <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/OTEIRMainPage/OTE_OIKONOMIKES_KATASTASEIS_IFRS_Q4_2010_GREEK_home.pdf">http://www.ote.gr/portal/page/portal/InvestorRelation/OTEIRMainPage/OTE_OIKONOMIKES_KATASTASEIS_IFRS_Q4_2010_GREEK_home.pdf</a></p>
<p>EC3 Coverage of the organisation's defined benefit plan obligations.</p>	<p>(Partially) Employees –Equal Opportunities – Basic &amp; Additional Benefits</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>EC8 Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.</p>	<p>(Partially) Marketplace – Network &amp; Broadband Infrastructure</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p><b>Environmental</b></p>		
<p>EN3 Direct energy consumption by primary energy source</p>	<p>(Fully) Environment - Energy consumption</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>EN4 Indirect energy consumption by primary energy source</p>	<p>(Fully) Environment - Energy consumption</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>EN5 Energy saved due to conservation and efficiency improvements</p>	<p>(Partially) Environment - Energy conservation</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>EN6 Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.</p>	<p>(Partially) Environment - Energy conservation</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>EN7 Initiatives to reduce indirect energy consumption and reductions achieved.</p>	<p>(Partially) Environment - Measures for reducing energy use and GHG emissions</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>EN8 Total water withdrawal by source</p>	<p>(Fully) Environment - Water consumption</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>EN16 Total direct and indirect greenhouse gas emissions by weight</p>	<p>(Fully) Environment - Greenhouse gases and other gas emissions</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>EN17 Other relevant indirect greenhouse gas emissions by weight</p>	<p>(Partially) Environment - Other indirect greenhouse gases emissions</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>EN18 Initiatives to reduce greenhouse gas emissions</p>	<p>(Partially) Environment - Measures for reducing energy use and GHG emissions</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>

EN19 Emissions of ozone-depleting substances by weight	(Partially) Environment - Ozone layer	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
EN20 NOx, SOx, and other significant air emissions by type and weight	(Fully) Environment - Greenhouse gases and other gas emissions	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
EN21 Total water discharge by quality and destination	(Fully) Environment - Water consumption	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
EN22 Total weight of waste by type and disposal method	(Fully) Environment - Solid waste disposal Environment - Raw materials and waste management	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
EN23 Total number and volume of significant spills	(Fully) Environment - Lubricant oils and lead batteries	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
EN26 Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	(Fully) Environment - Products and services that reduce GHG emissions Environment - Raw materials and waste management	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
EN28 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	(Fully) Environment - Electromagnetic radiation	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
EN29 Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	(Fully) Environment - Road transportation activity of OTE owned vehicles fleet - Leased vehicles for the transportation of executives / employees - Business air travels abroad	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
EN30 Total environmental protection expenditures and investments by type.	(Partially) Environment - Electromagnetic radiation	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
<b>Social – Labour practices</b>		
LA1 Total workforce by employment type, employment contract, and region, broken down by gender.	(Fully) Employees – Overview of OTE's Workforce	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
LA2 Total number and rate of new employee hires and employee turnover by age group, gender, and region	(Partially) Employees - Recruitment and Termination	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>
LA3 Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	(Fully) Employees – Basic and Additional Benefits	<a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a>

<p>LA4 Percentage of employees covered by collective bargaining agreements.</p>	<p>(Fully) Employees –Equal Opportunities</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>LA6 Percentage of total workforce represented in formal joint management–worker health and safety committees that help monitor and advise on occupational health and safety programs.</p>	<p>(Partially) Employees – Health &amp; Safety</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>LA7 Rates of injury, occupational diseases, lost days, and absenteeism, and number of work related fatalities by region and by gender.</p>	<p>(Partially) Employees – Health &amp; Safety</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>LA8 Education, training, counselling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases</p>	<p>(Partially) Employees - Health &amp; Safety - Training Programmes</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>LA9 Health and safety topics covered in formal agreements with trade unions</p>	<p>(Partially) Employees - Health &amp; Safety</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>LA10 Average hours of training per year per employee by gender and by employee category.</p>	<p>(Partially) Employees - Training Programs</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>LA11 Programmes for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.</p>	<p>(Partially) Employees - Training Programs</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>LA12 Percentage of employees receiving regular performance and career development reviews, by gender.</p>	<p>(Fully) Employees – Evaluation System</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>LA13 Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.</p>	<p>(Partially) Employees – Overview of OTE Workforce</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a> and Investor Relations site -Board of Directors <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/composition">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/BoardofDirectors/composition</a> Management Team <a href="http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/ektelestikidioikisi/melidioikisis">http://www.ote.gr/portal/page/portal/InvestorRelation/CorporateGovernance/ektelestikidioikisi/melidioikisis</a></p>

<p>LA14 Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation</p>	<p>(Fully) Employees- Equal Opportunities and non -discrimination- Benefits - Recruitment and Termination</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p><b>Human rights</b></p>		
<p>HR4 Total number of incidents of discrimination and corrective actions taken.</p>	<p>(Fully) Employees – Equal Opportunities – Benefits – Recruitment and Termination</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>HR5 Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.</p>	<p>(Partially) Employees – Equal Opportunities Marketplace – Procurement</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>HR6 Operations and significant suppliers identified as having significant risk for incidents of child labour, and measures taken to contribute to the effective abolition of child labour.</p>	<p>(Partially) Employees - Equal Opportunities and non-discrimination</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>HR7 Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of all forms of forced or compulsory labour</p>	<p>(Partially) Employees - Equal Opportunities and non-discrimination</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p><b>Society</b></p>		
<p>SO1 Percentage of operations with implemented local community engagement, impact assessments, and development programs</p>	<p>(Partially) Society – Programs to support children, vulnerable groups, youth - Building ties in the Society - Cultural heritage – Local communities</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>SO3 Percentage of employees trained in organization’s anti-corruption policies and procedures.</p>	<p>(Partially) Employees – Training Programs</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>SO4 Actions taken in response to incidents of corruption.</p>	<p>(Fully) Corporate Governance – Compliance Committee</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>SO5 Public policy positions and participation in public policy development and lobbying.</p>	<p>(Partially) Marketplace – Regulatory Issues, Policy Forums</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>

<p>SO7 Total number of legal actions for anticompetitive behaviour, anti-trust, and monopoly practices and their outcomes.</p>	<p>(Fully) Marketplace – Regulatory Litigations</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>SO8 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.</p>	<p>(Fully) Marketplace – Regulatory Litigations</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p><b>Product Responsibility</b></p>		
<p>PR2 Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.</p>	<p>(Partially) Environment -Electromagnetic radiation</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>PR3 Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.</p>	<p>(Partially) Marketplace - Product Responsibility and Marketing Issues Environment -Electromagnetic radiation - Research and development</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>PR4 Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling by type of outcomes.</p>	<p>(Fully) Marketplace – Product Responsibility &amp; Marketing</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>PR5 Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.</p>	<p>(Fully) Marketplace – Customer Service</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>PR7 Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.</p>	<p>(Partially) Marketplace – Product Responsibility &amp; Marketing – Other products</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>PR8 Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.</p>	<p>(Partially) Marketplace - Regulatory Litigations</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>
<p>PR9 Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.</p>	<p>(Fully) Marketplace – Product Responsibility &amp; Marketing - Other products</p>	<p><a href="http://www.ote.gr/cr2010/cr2010_en/">http://www.ote.gr/cr2010/cr2010_en/</a></p>

# EXTERNAL ASSURANCE STATEMENT

**Independent assurance statement by Deloitte Hadjipavlou Sofianos & Cambanis S.A.** ('Deloitte') to the management of Hellenic Telecommunications Organization S.A. ('OTE') on the 2010 Corporate Responsibility Report ('CR Report') for the year ended 31 December 2010.

## Limitations of our review

- Our independent assurance statement concerns the electronic long version of OTE's CR Report available on internet at [http://www.ote.gr/cr2010/cr2010\\_en/](http://www.ote.gr/cr2010/cr2010_en/).
- In the event of any inconsistency in translation between the English and Greek versions of the Report, as far as our conclusions are concerned, the English version prevails.
- Our scope of work was limited to OTE's activities in Greece.

## Our conclusions

Based on the scope of our work and the assurance procedures we performed we conclude that:

- OTE has implemented processes and procedures, as described on page 26, that adhere with the principles of inclusivity, materiality and responsiveness as set out in the AA1000 AccountAbility Principles Standard 2008 ('AA1000APS'); and
- Based on the assurance work we performed, nothing has come to our attention that causes us to believe that the specific CR performance indicators defined below and OTE's self-declaration on page 2 that it has applied the GRI guidelines at level B+ in preparing the Report, are materially misstated.

## Our observations and recommendations

OTE has made the following key improvements in managing and reporting its CR performance during 2010:

- It has further expanded its CR team to include key personnel in various directorates charged with facilitating mainly the environmental CR data gathering and reporting.
- It further improved its CR reporting process, through a survey, addressed to the executives responsible for managing material CR issues, with regard to stakeholder engagement.

To improve future management and reporting of CR in accordance with AA1000APS we make the following recommendations to OTE:

## Inclusivity:

- OTE Management is engaged in a process of dialogue with its external stakeholders. Further formalizing stakeholder engagement policies and procedures will promote a more structured, formal and homogenized external stakeholder engagement approach across the organization's operations.

## Materiality:

- With continued focus on responsible procurement, further reporting on how OTE manages and mitigates the environmental and social risks associated with its supply chain would help stakeholders understand the management of this material issue.
- During our interviews with the executives responsible for managing material CR issues, we noted the existence of an established communication between the CR team and these executives. We recommend that in the future this communication occurs in a more integrated and regular manner so that material CR issues can be identified and prioritized more effectively.

## Responsiveness:

- The CR Report lists a number of targets, however to strengthen responsiveness to material issues we would recommend that OTE Management set more long and short-term targets, which incorporate relevant, quantitative and focused performance indicators.

The observations and recommendations have been taken into account in forming our conclusions on the CR Report as set out in this statement.

## Scope of our work and the assurance standards we used

OTE's Corporate CR team engaged us to:

**1. Provide Type 1 limited assurance in accordance with the AA1000 Assurance Standard 2008 ('AA1000AS'):**

- Inclusivity – how they identified and engaged with stakeholders to gain a full understanding of issues;
- Materiality – how they assessed the relative importance of each issue; and
- Responsiveness – how they responded to stakeholder issues and how this is reflected in the CR Report.

**2. Provide limited assurance on the following selected key performance data**

- Number of students receiving internships or part-time work experience  
[Building ties with society / Supporting youths and promoting their technology skills]
- Direct and indirect energy consumption by primary source (TJ)  
[Building ties with the environment / Environmental impacts from the operation of OTE in Greece / Energy consumption]
- Total direct and indirect greenhouse gas emissions due to the consumption of energy by weight (CO<sub>2</sub> e)  
[Building ties with the environment / Environmental impacts from the operation of OTE in Greece / Greenhouse gases and other gas emissions]
- Total transportation fuel consumption (litres)  
[Building ties with the environment / Environmental impacts from the operation of OTE in Greece / Road transportation activity of OTE owned vehicles fleet]
- Quantity of A4 paper consumed (tonnes)  
[Building ties with the environment / Environmental impacts from the operation of OTE in Greece /Solid waste disposal]
- Quantity of technical waste recycled (tonnes)  
[Building ties with the environment / Raw materials and waste management /Technical waste]
- Quantity of electrical and electronic equipment recycled (tonnes)  
[Building ties with the environment / Raw materials and waste management / Waste electrical and electronic equipment]
- Quantity of paper recycled (tonnes)  
[Building ties with the environment / Raw materials and waste management / Paper use reduction and paper recycling]
- Number of occupational accidents  
[Building ties with our employees / Health and Safety / Occupational accidents]
- Lost time due to occupational accidents (days)  
[Building ties with our employees / Health and Safety / Occupational accidents]
- Percentage of male/female employees  
[Building ties with our employees / Overview of OTE's workforce]
- Percentage of female employees in positions of responsibility

[Building ties with our employees / Overview of OTE's workforce]

- Total training hours in 2010  
[Building ties with our employees / Training programs]
- Number of reports filed about discrimination  
[Building ties with our employees / Equal opportunities and non-discrimination]
- Expenses for corporate responsibility actions and sponsorships (euros)  
[Building ties with the society / OTE sponsorships and corporate responsibility actions expenses ]
- Number of complaints in 2010 from operators  
[Building ties with the marketplace / New technologies and broadband / Fault reporting centre for telecommunication operators ]
- Number of complaints from customers and percentage of complaints resolved within 20 days  
[Building ties with the marketplace / Customer service / Complaints management]

*The above key performance indices are included in the the electronic long version of OTE's CR Report available on internet at [http://www.ote.gr/cr2010/cr2010\\_en/](http://www.ote.gr/cr2010/cr2010_en/).*

**3. Provide assurance in relation to the GRI self-declaration**

Whether OTE's self-declaration on page 2, applies the GRI guidelines at level B+ in preparing the Report, is not materially misstated.

We carried out Type 1 limited (i.e. moderate) assurance in accordance with AA1000AS. A Type 1 engagement requires us to report on the nature and extent of adherence to AA1000APS. To achieve moderate-level assurance we have used the criteria in AA1000AS to evaluate adherence to AA1000APS in combination with our robust evidence-based and quality-assured approach to professional, independent assurance.

We carried out limited assurance on the selected key performance indicators in accordance with the International Standard on Assurance Engagements 3000 (ISAE 3000). To achieve limited assurance the ISAE 3000 requires that we review the processes, systems and competencies used to compile the areas on which we provide assurance. This is designed to give a similar level of assurance to that obtained in the review of interim financial information. It does not include detailed testing of source data or the operating effectiveness of processes and internal controls.

**Our key assurance procedures**

To form our conclusions, we undertook the following procedures:

- Analysed and tested on a sample basis the processes related

to stakeholder identification and engagement, including review of a sample of engagements and the outcomes of engagement;

- Reviewed the process that OTE used to identify and determine material issues to be included within the CR Report. This included a review of external media coverage and peer reporting on CR in 2010 to corroborate issues identified by OTE;
- Interviewed a selection of OTE executives and senior management who have operational responsibility for CR issues, including the OTE CR team to understand the governance structures used for managing CR, engagement with stakeholders on CR issues, as well as implementation of CR related policies and initiatives in 2010 and the monitoring of these activities;
- Analysed and reviewed on a sample basis the key structures, systems, processes, procedures and controls relating to the collation, aggregation, validation and reporting processes of the selected CR performance indicators;
- Reviewed information and explanations about the Reports' assertions regarding CR performance in 2010;
- Reviewed OTE's approach to ensuring application of GRI guidelines, including checking that the GRI conformance index available on pages 127-140, contains the relevant indicators; and
- Reviewed the content of the CR Report against the findings of the aforementioned procedures and, as necessary, provided recommendations for improvement.

Our independence and competencies in providing assurance to OTE

- We complied with Deloitte's independence policies, which address and, in certain cases, exceed the requirements of the International Federation of Accountants Code of Ethics for Professional Accountants in their role as independent auditors, and in particular preclude us from taking financial, commercial, governance and ownership positions which might affect, or be perceived to affect, our independence and impartiality, and from any involvement in the preparation of the report. We have confirmed to OTE that we have maintained our independence and objectivity throughout the year and in particular that there were no events or prohibited services provided which could impair our independence and objectivity.
- Our team consisted of a combination of qualified Accountants with professional assurance qualifications and professionals with a combination of environmental, CR and stakeholder engagement experience, including many years experience in providing CR report assurance.

### Roles and responsibilities

The Corporate Responsibility team of OTE has prepared the CR Report for the intended audience of stakeholders, as outlined in the 'Corporate Responsibility and Business Strategy' section on page 22. The team, who collect and organize the CR report data from the intra-company CR team members, is also responsible for the preparation of the CR Report and for the information and statements contained within it. The General Directors are responsible for approving the CR report data, determining the CR targets and for establishing and maintaining appropriate performance management and internal control systems from which the reported information is derived.

Our responsibility is to independently express conclusions on the subject matters, as defined within the scope of work above, and in accordance with our letter of engagement. Our work has been undertaken so that we might state to OTE those matters we are required to state to them in this statement and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than OTE for our work, for this statement, or for the conclusions we have formed.



Athens, 9 June 2011  
Deloitte Hadjipavlou Sofianos & Cambanis S.A.  
Assurance & Advisory Services  
Paris Eftymiades  
Partner

**Deloitte.**



AA1000  
Licensed Assurance Provider  
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## Statement GRI Application Level Check

GRI hereby states that **Hellenic Telecommunications Organisation (OTE)** has presented its report "2010 Corporate Responsibility Report" to GRI's Report Services which have concluded that the report fulfills the requirement of Application Level B+.

GRI Application Levels communicate the extent to which the content of the G3.1 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3.1 Guidelines.

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

Amsterdam, 8 June 2011

A handwritten signature in blue ink, appearing to read "Nelmara Arbex", is written over a faint, large watermark of the GRI globe logo.

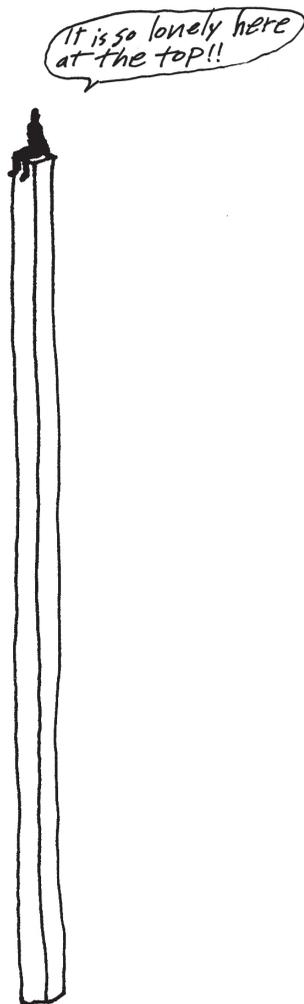
Nelmara Arbex  
Deputy Chief Executive  
Global Reporting Initiative



The "+" has been added to this Application Level because Hellenic Telecommunications Organisation (OTE) has submitted this report for external assurance. GRI accepts the reporter's own criteria for choosing the relevant assurance provider.

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

**Disclaimer:** Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 23 May 2011. GRI explicitly excludes the statement being applied to any later changes to such material.





OTE's signal transmitters



OTE's signal transmitters



OTE's environmental activities



OTE Employees Cultural Centers environmental activities



Initiatives for the salvation of the brown bear (OTE – NGO Kallisto)



Wild bird release in cooperation with the NGO ANIMA



Fault management by OTE technicians



Fault management by OTE technicians



OTE call centre



OTE call centre

Football meeting of OTE's Cultural Centers



“Safer Internet” campaign



“Safer Internet” campaign



OTE Employees Cultural Centers environmental activities



Students informative meetings at OTE’s Telecommunications Museum



Students informative meetings at OTE’s Telecommunications Museum



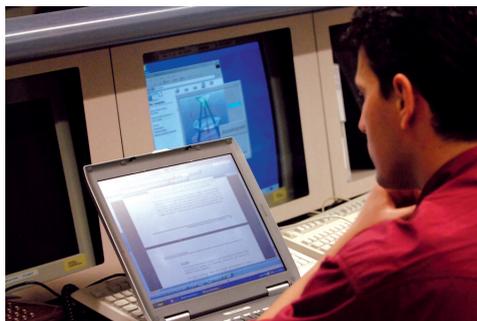
Fault management by OTE technicians



Wild bird release in cooperation with the NGO ANIMA



OTE employee volunteer blood donor



OTE's Operations Centre



OTE supports the Association “The Smile of the Child”



Internal “Anti-smoking” campaign



Event of the NGO “S.K.E.P” (Association of Social Responsibility for Children and Youth), with OTE’s support



“Safer Internet” campaign in OTESHOP stores



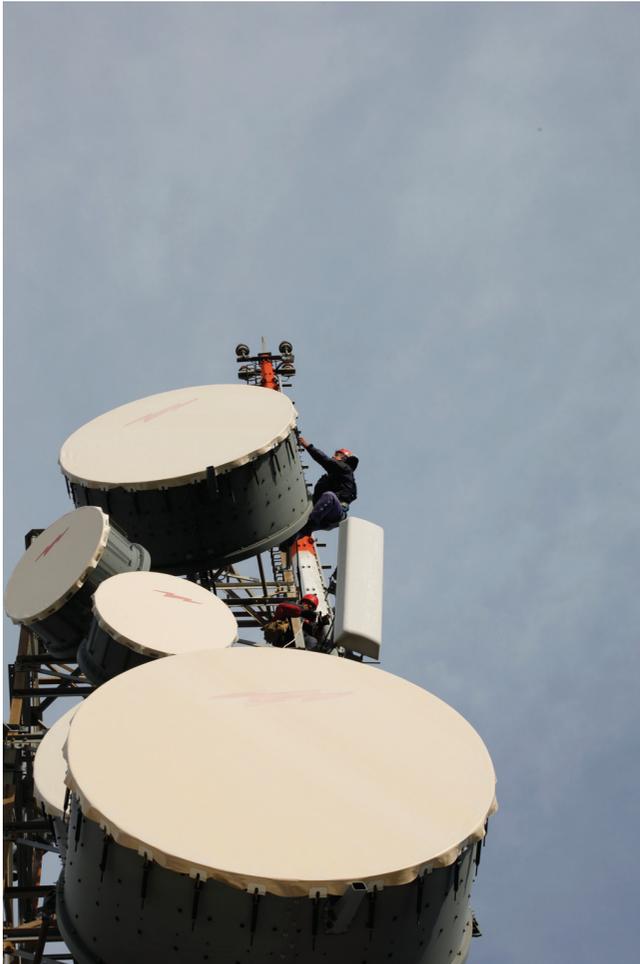
Children's workshop in OTE's Telecommunications Museum



Recycling



OTE headquarters building



Specially trained technician



MNP