



United Nations Global Compact Communication on Progress (COP), 2008

“Corporate responsibility is a central element in our business success and sustainability. UN’s encouragement and guidance through Global Compact is a welcomed initiative that we have chosen to support and uphold in the internal operations of our company and as principles guiding our relations with external stakeholders. Our company is proud to be part of this global commitment.”

Mr Panagis Vourloumis, 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; and communications with key stakeholders and partners.

Our Corporate Responsibility Report for 2008, also available on our website (<http://www.ote.gr/portal/page/portal/OTEGR/CorporateSocialResponsibility/OurCRProgram>) 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 2008 our main achievements relevant to adherence to Global Compact principles include:

- ✚ Focusing on our systematic efforts to record, measure and gradually reduce the company’s “ecological footprint”.
- ✚ Investing in and contributing to Greece’s much needed broadband development, while placing special emphasis on bridging the broadband gap in remote areas of the country and facilitating access to new technologies for vulnerable social groups.
- ✚ 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’ wellbeing 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.

UN Global Compact 10 Principles – OTE Compliance

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights (1-2), labor standards (3-6), the environment (7-9), and anti-corruption (10):

UN Principles	OTE policies and practices	Key Actions and Outcomes 2008	OTE 2008 CR Report Page reference
1. Businesses should support and respect the protection of internationally proclaimed human rights.	OTE has set as a priority in its CR strategy the protection of human rights of its employees. OTE implements Employee policies and an Internal Code for Employees which includes protection of workers' rights.	Conducted Team Building: 'Action Team...with a Green Mission,' aiming to inform and strengthen the cohesion between the member of the inter-company Corporate Responsibility team.	59: Building Ties with Employees 62: Equal Opportunities
2. Make sure that they are not complicit in human rights abuses.	New Procurement policy has increased control mechanisms for OTE suppliers and supply chain.	Started application of new Procurement Policy. Preparation of detailed Action Plan that includes provisions regarding Vendors and the induction of new procedures.	48: New Procurement Policy
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	OTE staff enjoy right of access to well established and functioning trade unions.	All Company employees, without exception, are covered by agreements based on collective negotiations. In 2008 there were no complaints for discrimination submitted to OTE.	31: Relations with Trade Unions – Elected Representatives 62: Equal Opportunities
4. The elimination of all forms of forced and compulsory labour.	OTE's Employment policies and Internal Code for Employees prevent forced labour. In addition, the new OTE Procurement policy has increased control mechanisms for OTE suppliers.	Implementation of new Procurement Policy including detailed Action Plan that includes provisions regarding Vendors and the induction of new procedures.	62: Equal Opportunities 48: New Procurement Policy
5. The effective abolition of child labour.	OTE's Employment policies and Internal Code for Employees prevent child labour. In addition, the new OTE Procurement policy has increased control mechanisms for OTE suppliers.	Implementation of new Procurement Policy including detailed Action Plan that includes provisions regarding Vendors and the induction of new procedures.	62: Equal Opportunities 48: New Procurement Policy
6. The elimination of discrimination	At OTE, there is no pay discrimination of any kind based	In 2008 there were no complaints for discrimination	62: Equal Opportunities

in respect of employment and occupation.	<p>on gender. The employees' basic salary is calculated on length of service and educational level.</p> <p>OTE implements equal opportunities policies and transparent employee evaluation systems.</p>	<p>submitted to OTE.</p> <p>In 2008, annual employee evaluation system was introduced covering 100% of the permanent workforce.</p>	63: Establishment of Employee Evaluation system
7. Businesses should support a precautionary approach to environmental challenges.	OTE supports the precautionary principle by taking a proactive approach to measuring and reducing its environmental impact.	Continue documenting the ecological footprint of the OTE Administration Building and expanding the recording to select buildings in Attica.	75: Building Ties with the Environment
8. Undertake initiatives to promote greater environmental responsibility.	Recording of ecological footprint and initiatives to save energy and reduce CO2 emissions.	<p>Installation of 5 additional VRV units throughout Greece, replacing the older AC systems.</p> <p>Continue the installation and development of the 'Building Management System'.</p> <p>Completion of the design and development of the Integrated Management System at two Central OTE Departments.</p>	75-82: Building Ties with the Environment
9. Encourage the development and diffusion of environmentally friendly technologies.	OTE promotes the use of wind turbines and photovoltaic systems in infrastructure projects, and energy saving lighting and heating/cooling systems in its operational buildings.	Started light-bulb replacement program in OTE stores, throughout Greece; installation of lower energy or free cooling systems in OTE digital centres; and started installation of lower-energy systems at OTE buildings.	78: Renewable Energy Sources
10. Businesses should work against corruption in all its forms, including extortion and bribery.	OTE's Corporate Governance policy includes specific control measures to prevent bribery and corruption.	<p>Company-wide training and communication campaigns on "Compliance Management System" for all employees at all levels.</p> <p>Included in FTSE4Good index, having met all anti-bribery criteria.</p>	14-15: Corporate Governance
Contributing to broader	OTE is making a decisive contribution to building Greece's	Development and expansion of infrastructure - increase in	40-43: New Technologies

<p>development goals</p>	<p>broadband infrastructure and services, including to make sure everyone in the country (remote areas, vulnerable groups) are reached in this effort.</p> <p>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.</p>	<p>available Internet access speeds</p> <p>Provision of improved products and services to special groups (discounted bills, etc.)</p> <p>Conducted surveys on NGO and employees views of OTE's CR, and published the results in the 2009 CR Report.</p>	<p>and Broadband Services</p> <p>46: Providing telecommunication products and services for people with special needs</p> <p>90: Support for children, socially vulnerable groups and youths</p> <p>30: Stakeholder Relations: Research Results: NGOs</p>
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