

Corporate Responsibility Report

April 2008 - March 2009

power to you



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of Directors and Chief Executive

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Letter from the Chairman
of the Board of Directors
and Chief Executive



Over the last year we faced major challenges, primarily due to the need to put in place suitable infrastructure to enhance customer service, but also to make the company more competitive. Support for that infrastructure also made it necessary to internally restructure the company, aiming innovation in the mobile telecommunications sector. The challenge we faced in this regard was to ensure that the changes made shall reflect our corporate Principles and Values, while minimising the financial and other impacts on employees to the greatest extent possible.

At Vodafone Greece we believe that the mobile telecommunications sector is a powerful force for both economic and social development. We also believe that development must go hand-in-hand with the principles of sustainability and take into account both the positive and negative impacts that development can have on the environment and society.

Bearing those points in mind, we at Vodafone Greece continue to **systematically invest** in network development, energy efficiency, the use of renewable energy sources, and recycling. While keeping ourselves abreast of climate change issues and the associated risks and opportunities, we utilise the potential afforded by our technology to **reduce the environmental impact** of our operations. Indicatively examples of this approach include the use of video-conferencing instead of business travel, resulting in the reduction of the associated CO₂ emissions, and web-based access to itemised bills for all services resulting in a major decrease in paper consumption.

The responsible use of the constantly developing mobile telecommunications technology and the services we offer, remain one of the greatest challenges we face. Once again our **"Parents' Guide to Mobile Telecommunications"** offers practical hints and tips about how parents can encourage their children to use their mobile phones responsibly, if -of course- they allow their children to use a mobile phone.

Utilising our technology to improve health services and protect the environment is a challenge for us, but it is also an opportunity for us to develop new products and services. The **Telemedicine** program we run in 17 remote areas of Greece is designed to improve the quality of life and day-to-day existence of the people living there by giving those suffering from chronic illnesses access to healthcare services at home. By eliminating the barriers created by geography, users of the service no longer have to travel to see a specialist. The innovative **brown bear protection** program, which is being implemented in collaboration with the environmental organisation, ARCTUROS, utilises our mobile telecommunications network to track bears and to record data on their movements and behavioural patterns to protect them from potentially harmful human activities.

We are firmly committed to ensuring that our products and services are accessible to all our customers. Against that background, we continue to provide the "Vodafone Speaking Phone" service to the visually impaired, and also support the innovative, multi-purpose information and communication portal for the visually impaired, www.blind.gr.

Over the last year we celebrated **seven consecutive years** of Vodafone Greece contribution in the area of **Social Investment** through the implementation of programs with emphasis on children and the environment. In those seven years, our programs have reached out to more than 500,000 children and their parents across all of Greece.

This **seventh** consecutive **Report** presents the programs which Vodafone Greece has implemented, and will continue to implement; our objectives, and the results achieved in the last financial year, as well as our commitments for the new financial year. For the 5th consecutive year we are employing the Global Reporting Initiative (GRI) international guidelines to ensure that our results are reported objectively and transparently. In recognition of our endeavour to constantly improve the range of information included in the Corporate Responsibility Report, we are very proud to announce that the content of this year's report has been rated at **GRI application level A**.



Nicos Sophocleous
Chairman of the Board of Directors & Chief Executive

[...] At **Vodafone** Greece we aim
to reduce the negative impact and
bolster the positive impact
on the world around us

At Vodafone Greece we use the term **Corporate Responsibility** not **Corporate Social Responsibility** because we believe that an integrated **Corporate Responsibility** program relates to how a company is managed, operates and behaves towards society, stakeholders and the environment. In our definition a company is responsible when at the same time as achieving its commercial objectives it also takes into account the impact of its operations on society as a whole and takes suitable steps in that regard with measurable results. Consequently, depending on the extent of its activities and without this necessarily translating into financial outlays, the company is obliged to reduce its potential negative impact and bolster its positive impact on the world around it.

The multi-faceted Vodafone Greece Corporate Responsibility program is defined through the Risk Assessment process and the Stakeholder Engagement Survey, both conducted every two years for all company's operations (see pages 17-18). Based on the results of these processes, the areas where we focus our activities, with systematic actions and measurable results, are:

1. Environment
2. Mobile Phones - Masts - Health
- Network Deployment
3. Access to Communications
4. Customers
5. Supply Chain
6. Employees
7. Social Investment

This is the 7th Vodafone Greece Corporate Responsibility Report which presents the management practices and the results of our actions for the financial year from 1 April 2008 to 31 March 2009 (2008-2009 period). The information relates to VODAFONE PANAFON S.A. and its operations at its central and regional offices, its telecommunications network and its shops (own and franchise).

Note

- The term "Vodafone Group" refers to Vodafone Group Plc which directly or indirectly holds 99.878% of Vodafone Greece's share capital.
- The 2008-2009 objectives cited in this report were laid down in the Corporate Responsibility Report for the 2007-2008 financial year, which is available on the website www.vodafone.gr.



Vodafone Greece Corporate Responsibility Reports

Sources of information

All information included in this publication is available on the company's website and is updated at regular intervals. For more information visit the website www.vodafone.gr.

- The EMAS Environmental Statement is also available at www.vodafone.gr.
- This Corporate Responsibility Report that refers to the financial year 1 April 2008-31 March 2009, as well as all previous Corporate Responsibility Reports relating to the financial years 1 April 2002-31 March 2003, 1 April 2003-31 March 2004, 1 April 2004-31 March 2005, 1 April 2005-31 March 2006, 1 April 2006-31 March 2007, 1 April 2007-31 March 2008 are available at www.vodafone.gr.
- Vodafone Group Corporate Responsibility Report is available at www.vodafone.com/CorporateResponsibility.

Comments

We welcome your feedback about our activities in the Corporate Responsibility area and about this publication.

Please send your views to:

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Tel.: +30 210 67 02 651, Fax: +30 210 67 02 946

Vodafone Greece Corporate Responsibility Report Data Audit

The environmental data in this Report is subject to audit and verification performed in the context of the company's certification according to the international standard ISO 14001:2004 and the European Eco-Management and Audit Scheme (EMAS) Regulation by the accredited certification body Lloyd's Register Quality Assurance (LRQA). Moreover, it is also included in the EMAS Environmental Statement, which is approved by the Ministry of the Environment, Physical Planning and Public Works and submitted to the competent body of the European Union.

This Report follows the basic principles, guidelines and instructions contained in the Global Reporting Initiative (GRI) in those areas where applicable in order to facilitate content evaluation and comparison with other companies. Lastly, the AA1000 Assurance Standard has been taken into consideration in publishing this Report.

Lastly, this Report meets the Application Level A criteria contained in the Global Reporting Initiative guidelines (GRI G3) as confirmed by KPMG Advisors A.E., to whom an audit of this matter was assigned.

05/2006

Vodafone Greece renews registration in the European EMAS Regulation Register

07/2006

Commence of the pilot Telemedicine program in 5 regional medical offices of Central Macedonia

10/2006

First place worldwide for Vodafone Group according to the Accountability Rating® index

01/2007

New organisational structure for Vodafone Greece, since on January the 22nd, Mr Charalambos Mazarakis, is appointed Chief Operating Officer

02/2007

New Vodafone Greece advertising campaign "Live the moment"

03/2007

Best Corporate Responsibility Report for Vodafone Group (2006) at the Acca Prizes

03/2007

Collaboration with the Scouts of Greece to promote mobile phones and accessories recycling

03/2007

Initiate an integrated Corporate Responsibility print campaign

04/2007

Present the new, innovative, Vodafone Greece shops model

06/2007

"Ecopolis 2007, Annual Environmental Policy Program" award from NGO Ecocity

07/2007

Vodafone Greece innovates: for the first time ever in Greece total communication package offering: mobile, fixed number and fast internet (ADSL) in one bill

10/2007

Best Corporate Responsibility website page from Eurocharity within the framework of "CEO & CSR 2007, CSR in Business Strategy" conference

11/2007

"Business Ethics Excellence - Bronze, Good Will Award" from the Hellenic Business Ethics Institute (EBEN GR)

11/2007

Vodafone Greece innovates: brings mobile internet simply and quickly just at the click of a button

12/2007

Vodafone Greece ranks first in "Accountability Rating Greece 2007" from the Institute of Social Innovation

12/2007

Vodafone Greece extends mobile phones and accessories recycling program to its business Customers

02/2008

Post that Mr George Koronias, on March the 31st, hands over the reins of Vodafone Greece, after 16 years at the company's helm. New Chairman and Chief Executive is Mr Nicos Sophocleous

03/2008

"Leading Company Greece 2007" award in the area of Corporate Responsibility by Hay Group

03/2008

Telemedicine program extended to 17 municipalities nationwide

04/2008

Vodafone Group's CEO, Arun Sarin, announces Vodafone's commitment to reduce CO₂ emissions by 50% by 2020

05/2008

Vodafone Greece becomes a "Messenger" in Greenpeace energy-saving campaign

06/2008

"Ecopolis 2008, Environmental Communication Award" from NGO Ecocity

06/2008

"Silver Business Ethics Excellence – Proven Support Award" from the Hellenic Business Ethics Institute (EBEN GR)

07/2008

Re-certification of Vodafone Greece and its shops' Quality Management System in line with ISO 9001:2000, of Vodafone Greece and its shops Occupational Health and Safety Management System in line with OHSAS 18001:2007 and Vodafone Greece and its shops Environmental Management System in line with ISO 14001:2004

08/2008

iPhone 3G released on the Greek market

09/2008

Light bulb recycling programs starts at 4 company buildings nationwide

09/2008

The Scouts of Greece and Vodafone Greece celebrate one year of partnership in the mobile phones and accessories recycling program

10/2008

The corporate responsibility educational game 'Mobile Invaders' available from the VF live! services menu and in the company's website

11/2008

Vodafone Greece starts providing support to the innovative scientific program relating to the conservation of the brown bear run by ARCTUROS for the first time in Greece

11/2008

Program to recycle small electrical and electronic appliances launched at 5 company buildings nationwide

12/2008

Mobile Advertising services fully available commercially

12/2008

Vodafone Greece ranks second in "Accountability Rating Greece 2008" from the Institute of Social Innovation

12/2008

Stoppage on issuance of fully analytically bills for Vodafone Greece employees, in order to reduce paper consumption

12/2008

Blind O.C.R. service available as part of the support provided to www.blind.gr for the visually impaired

12/2008

Vodafone Greece remains on the EMAS register for the 5th consecutive year

12/2008

Higher speed testing for the Mobile Broadband service

01/2009

Extension of mobile phones recycling program to fixed telephony and internet equipment, accessories, laptops and modems

02/2009

Telemedicine program launched at Roma medical and social welfare centers in Trikala and Sofades

02/2009

Release of the new exclusive Blackberry® Storm™ smartphone

03/2009

"1st Award on Sustainable Development Management" by the Greek Association of Environmental Protection Companies (PASEPPE)

Vodafone Group - Vodafone Greece: Key financials and statistics

Vodafone Group	2008-2009 (£ bn)	2007-2008 (£ bn)	Vodafone Greece	2008-2009 (€ million)	2007-2008 (€ million)
Revenue	41	35.5	Turnover	1,505.61	1,670.8
Adjusted Operating Profit	11.7	10.1	Earnings before interest, taxes, depreciation and amortisation (EBITDA)	484.5	568.6
Free cash flow	5.7	5.5	Earning before taxes	237.7	334.6
Market capitalisation (at 31 March)	64.4	81.6	Net sales	708.2	810.7
Closing proportionate customers (m)	302.6	260.5	Total investment in assets	2,529.64	2,446.50
			Cost of goods sold	797.4	858.6



Managing Corporate Responsibility

We have integrated Corporate Responsibility into our vision, values, strategic goals and business principles and into the corporate governance manual and policies we implement. We believe that Corporate Responsibility should be an integral part of our day-to-day operations and it is critical that we constantly make improvements based on solid conclusions. For this reason, we have established a system to measure and evaluate our performance.

[...] At **Vodafone** Greece we aim worldwide to “be a responsible business”

Responsibility is part of our Vision, Values, Goals, Business Principles, Strategy and Governance

Our Vision

“We will be the communications leader in an increasingly connected world.”

Our Strategic Goals

1. Build the best global Vodafone team
2. Delight our customers
3. Provide superior shareholder returns
4. **Be a responsible business**
5. Leverage global scale and growth
6. Expand market boundaries

Our Code of Conduct

Vodafone's global success emanates from its reputation as a company with integrity and high moral standards, built through our commitment to sound business conduct and the way we interact with our key stakeholders.

The company's vision and targets must be pursued within a framework of agreed principles and values, which will determine the everyday conduct and practices of its employees. Our corporate values will explicitly define our responsibilities towards all those groups which are –directly or indirectly– affected by our business activities.

The Code of Conduct we have prepared and distributed to all employees and external associates seeks to provide guidelines on our day-to-day conduct and to help attain company targets and priorities. It is one of the tools used to ensure that we will continue to be a responsible business.

All employees are responsible for implementing the Code of Conduct, and managers are responsible for briefing their subordinates. All employees received a copy of the Code of Conduct and the management team has signed a statement accepting it and undertaking to implement it.

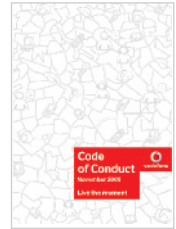
All employees are obliged to report any incident or possible situation by utilising the clearly defined procedures which have been put in place. Failure to comply with the Code of Conduct is examined by the Business Conduct Committee which has been set up, and this can lead to appropriate disciplinary measures being imposed.

The most effective assurance mechanism is constant vigilance by all of us, at all times, to ensure that Vodafone Greece is clearly seen to act in keeping with the commitment to maintain the highest ethical standards.

All company employees have been informed via the Code of Conduct about how to deal with corruption. The Code of Conduct requires that all employees act fairly, honourably and with integrity in their dealings with all stakeholders. In addition, the company's operating procedures (e.g. the supply chain management procedure) require employees to operate within the limits of the law and ensure that this is so. An Official Disciplinary Board has also been set up which exercises disciplinary power within the company. No case of corruption was drawn to the Board's attention via the available communication channels this year.

► 2009-2010 Objective

Set up a whistle blowing mechanism for cases of corruption.



Code of Conduct

Our Business Principles

1. **Value Creation.** We believe that competition in a market economy, pursued in an ethical way, is the best way of delivering benefits to our stakeholders.
2. **Public Policy.** We will voice our opinions on government proposals and other matters that may affect our stakeholders but we will not make gifts or donations to political parties or intervene in party political matters.
3. **Communications.** We will communicate openly and transparently with all of our stakeholders within the bounds of commercial confidentiality.
4. **Customers.** We are committed to providing our customers with safe, reliable products and services that represent good value for money.
5. **Employees.** Relationships with and between employees are based upon respect for individuals and their human rights.
6. **Individual Conduct.** We expect all our employees to act with honesty, integrity and fairness.
7. **Environment.** We are committed to sustainable business practices and environmental protection.
8. **Communities and Society.** We accept our responsibility to engage with communities and we will invest in society in a way that makes effective use of our resources, including support for charitable organisations.
9. **Health and Safety.** We are committed to the health and safety of our customers, employees and the communities in which we operate.
10. **Business Partners and Suppliers.** We will pursue mutually beneficial relationships with our business partners and suppliers.
11. **Guidance.** We believe that business life is about employees having the freedom to take decisions, so long as these are consistent with these Principles. However, it is inevitable that there will be occasions where individuals are confronted by situations not covered by precedent or procedure and have to make a decision on the most appropriate course of action. On these occasions when the matter is unclear, any questions or queries should be brought to the attention of the Line Manager.

In addition:

- ▮ Vodafone Greece's 5-year strategic plan encompasses the implementation of Corporate Responsibility via specific, long-term and medium-term objectives.
- ▮ Vodafone Group's Corporate Governance and Policies Manual (available at www.vodafone.com), which all members of the Group are obliged to adhere to and which is revised at regular intervals:
 - covers optimum management of potential risk
 - stresses the importance of vision and values
 - provides information about the structure of the Group's various teams, their areas of responsibility, and sectors where guidance is required.

Our Corporate Governance

Corporate Governance is a set of principles used to promote responsible management, running, organisation and control of a company. Vodafone Greece attaches particular importance to Corporate Governance and has developed a set of principles and rules to ensure that the company operates in a transparent manner and to ensure that the company is managed in line with the interests of all stakeholders. Several corporate governance committees have been set up by the company:

Board of Directors

Vodafone Greece is managed by the Board of Directors consisting of 3 to 11 Directors. The members of the Board of Directors (www.vodafone.gr) are appointed by the shareholders of the company for a five year term, automatically extended until the first regular General Meeting following the expiration of their term, which term cannot exceed a six year period. The members of the Board of Directors, shareholders or not, can be re-elected and are freely revocable.

The Board of Directors has the responsibility for the administration (management and disposition) of the company's property and the representation of the company. It decides generally on all issues concerning the company including (indicatively: the raise of loans, the approval of the years financial statements), guarantees in favour of third parties and the entrusting of the management of the company to third parties within the frame of the company's object, with the exception of those which, pursuant to the law or to articles, belong to the exclusive authority of the General Meeting.

The Board of Directors may, exclusively and only in writing and by special resolution, entrust the exercise of all or several of its powers and authorities (except for those requiring collective action), as well as the representation of the company, to one or more persons, among its members or not, determining at the same time the extent of their authority. In any event the authority of the Board of Directors is subject to the provisions of Articles 10 and 23a of C.L. 2190/1920, as in force. Especially for the cases where it is imperative for the company to be represented by personal appearance before any Court, Prosecutor or other Judicial Authority, in order to testify under oath, submit lawsuits or file a complaint and to relinquish from these actions, attend as civil plaintiff before any penal court both in the prejudicial stage and in the court hearing stage and to relinquish from this attendance, initiate judicial process against penal court decisions and orders and relinquishment from these actions, the company is duly and legally represented apart from the Chair-

man, by the Deputy Chairman and Chief Executive, by any Director of Division or subdivision, or regional division and for cases regarding Vodafone Shops by its manager or his substitute.

Immediately after its election the Board of Directors meets self-invited or after invitation by the elder of the Directors and is organised as a corporate body electing its Chairman and Vice Chairman. The Board of Directors may elect one Managing Director (Chief Executive Officer), only among its members, determining at the same time their authority. The capacity of the Chairman or the Vice Chairman can coexist in the same Director with the one of the Managing Director. The Chairman of the Board of Directors conducts the meetings. The Chairman, in his absence or hindrance, is replaced to the full extent of his authority by the Vice Chairman and in case of hindrance of the latter, following a resolution of the Board of Directors, by the Managing Director, or by any other Member of the Board.



1.



2.

1. The "Hellenic Network for CSR" logo

2. The "Hellenic Business Ethics Institute" logo

If for any reason, a Director's seat is vacated, the remaining Directors, as long as they are at least three, elect temporarily a substitute for the remaining time of the term of office of the replaced Director. Such election must be submitted for approval to the first following Ordinary or Extraordinary General Meeting. The actions of the Director who was elected this way are considered valid, even if his election is not approved by the General Meeting. After the annual accounts (annual financial statements) have been approved, the General Meeting, by a special vote conducted by roll call, resolves on the release of the Board of Directors and the Auditors from any liability for compensation. The Board of Directors and the employees of the company vote only with shares they own. The release of the Board of Directors is invalid in the cases of Article 22a of Codified Law 2190/1920.

More information regarding the Board of Directors, is available in Vodafone Group Corporate Responsibility Report, as well as on the websites www.vodafone.com and www.vodafone.gr.

Executive Committee

The CEO set up the Executive Committee to assist him in his work and its activities include:

- Reviewing financial and business trends and evaluating the suitability and appropriateness of company strategy.
- Reviewing organisational issues.
- Setting business priorities.
- Taking business investment decisions.
- Reviewing major audit findings and deciding on the appropriate steps to be taken.
- Providing briefings about developments and/or new guidelines at Vodafone Group level.

The company's Executive Committee has 7 members; the CEO, the Chief Financial Officer, the Human Resources Director, the Technology Director, the Information Technology Director, the Consumer Commercial Director and the Business Commercial Director. It meets once a month after the end of each month to discuss results, and extraordinary meetings are also scheduled whenever they are considered necessary.

Management Committee

The CEO also set up the Management Committee to assist him in his work and its activities include:

- Reviewing company results.
- Reviewing the progress of important projects and deciding on the next steps to be taken.
- Providing briefings about developments and/or new guidelines at Vodafone Group level.

The company's Management Committee has 12 members; the CEO and the heads of company Divisions. It meets twice a month and there are a total of 24 meetings a year, but extraordinary meetings can also be scheduled if that is considered necessary.

Internal Audit Committee

The Internal Audit Committee has 3 members appointed every 2 years by the Company's Board of Directors. The Board of Directors can also replace members when appropriate. The Chairman of this Committee must be an independent, non-executive director specialised in economics and finance and a senior figure from one of the Vodafone Group Plc subsidiaries. The Committee meets whenever necessary, but a minimum of three times a year.

In carrying out its task the Committee draws, in part, on the experience of the Company's Management, on the head of the Internal Audit Department and on external auditors. Just some of the Committee's duties include obtaining reports from management, internal and external auditors as and when it considers this appropriate. The Committee's main duties are listed below:

- Reviewing and discussing, with Management and the auditors, preliminary results, results of interim audits and the IFRS-complaint annual financial statements.
- Reviewing and discussing major accounting issues and reports with Management and the auditors and understanding their impact on the financial statements.
- Examining the findings of internal and external auditors concerning major weaknesses in the accounting and auditing systems.
- Reviewing and evaluating the company's general risk management system and the adequacy of its internal audit system, including information and data security.

- Examining high risk audit issues which have been identified and ensuring that suitable measures are taken to address any weaknesses which appear.
- Supervising the activities of the company's Internal Audit Department, including reviewing its articles of association, plans, resources, operations, staffing and organisational structure.
- Monitoring the implementation of and constant compliance with business procedures to ensure compliance with the Vodafone Group's Corporate Governance and Policies Manual, applicable laws and regulations and the company's Code of Conduct.

Business Conduct Committee

The Board of Directors decided to establish a Business Conduct Committee which exercises disciplinary power within the company in line with its approved Labour Regulation. The Business Conduct Committee has 3 members; the Human Resources Director, the Chief Financial Officer and the manager of the department in which the employee charged with a disciplinary offence comes from. The Committee meets whenever there are disciplinary matters to be examined.

The Business Conduct Committee is responsible for the following issues:

- Examining whether company staff complaints about working conditions in the company are well-founded, in line with the provisions and the restrictions in the applicable laws and Labour Regulation.
- Reviewing poor management of corporate affairs.
- Hearing the employees involved or other witnesses in line with Articles 24 or 25 of its Labour Regulation.
- Contacting Executives or other company employees to obtain information, if necessary.
- Inviting company employee's charged with a disciplinary offence to provide explanations.
- Taking a reasoned decision on whether or not to impose a disciplinary measure after disciplinary proceedings are over.
- Briefing the CEO, submitting disciplinary measure imposed for approval and notifying its decision to impose sanctions to the employee concerned within a reasonable time period.

Assessing the impact of our operations

Every two years we carry out a Risk Assessment in the fields of:

1. Energy - Carbon Dioxide (CO₂) Emissions
2. Waste
3. Responsible Network Deployment
4. Electromagnetic Fields (EMF)
5. Suppliers - Subcontractors
6. Cooling - Fire Suppressant Systems
7. Services Content - Spamming - Responsible Mobile Phone Usage
8. Products and Services
9. Responsible Marketing
10. Corporate Governance - Legislative Compliance - Workplace
11. Health and Safety
12. Emergencies
13. Water - Noise Pollution

Risk Assessment includes the following 5 stages:

1. Identification of the direct and indirect impacts that Vodafone Greece's operations may have.
2. Study of the relevant legislation, policies, and/or best practice codes, that Vodafone Greece is signatory.
3. Evaluation of the importance of identified impacts, based on the likelihood of their occurrence (on a scale of 1 to 5) and their potential impact (on a scale of 1 to 10).

4. Risk quantification (e.g. 70 out of a maximum of 100).
5. Prioritisation and target-setting for programs the company is obliged to implement to minimise risks.

Identifying our Stakeholders' expectations

To better understand the needs and expectations of the society in which we operate, every two years we carry out a qualitative and quantitative survey using an independent research firm. In 2005 we carried out a quantitative and qualitative survey involving 150 stakeholders, which was repeated in 2007 with 334 stakeholders. Stakeholders from categories 1 to 8 in the table below participate in this survey:

1. Non-Governmental Organisations (NGOs)
2. Government - Local Authorities - Institutions
3. Suppliers
4. Vodafone Shops (Franchises) and other Retail Partners
5. Journalists
6. Academia
7. Business Community
8. Employees
9. Customers
10. Public
11. Local Communities

In 2005, the survey clearly demonstrated the need of stakeholders for short, focused and frequent information bursts relating to Vodafone Greece's activity in the Corporate Responsibility area. On the basis of this, in March 2007, we presented an integrated print campaign designed to present Vodafone Greece's Corporate Responsibility programs. In 2007, Vodafone Greece's stakeholders highlighted the following points:

- ▮ Vodafone Greece is considered by the majority of its stakeholders to be one of the pioneers in Corporate Responsibility in Greece. It was ranked either equal to, or higher than, other companies in answers to the survey questions
- ▮ almost all Vodafone Greece's stakeholders appear to support the company's approach to Corporate Responsibility, and to a large extent the action areas it has chosen to focus on
- ▮ the majority of stakeholders are satisfied by Vodafone Greece's overall Corporate Responsibility approach
- ▮ almost 7 out of 10 of stakeholders believe that, compared to 2 to 3 years ago, the company's Corporate Responsibility has visibly improved
- ▮ Vodafone Greece's Corporate Responsibility strategy is extensively communicated to the company's stakeholder groups; almost 8 out of 10 stakeholders speak positively about the company's Corporate Responsibility (prompted or unprompted answers)

- almost all stakeholders ranked their interaction with Vodafone Greece as highly satisfactory
- the company's Corporate Responsibility strategy appears to have a remarkable degree of influence on general collaboration with those stakeholders who have come into contact with the company on Corporate Responsibility issues
- more than 6 out of 10 stakeholders feel that Vodafone Greece keeps them well informed about its Corporate Responsibility activities. However, just over one third ranked the information from the company in this particular field as limited
- more than 8 out of 10 stakeholders declare their trust in the company
- more than 7 out of 10 stakeholders consider the company as reliable, which has a major impact on overall trust placed by stakeholders in the company.

Vodafone Greece conducts a systematic pan-Hellenic survey of a representative sample of the general public, investigating consumer perceptions of Vodafone Greece's brand image. Part of this survey analyses the degree to which the general public considers that Vodafone Greece is a company that operates responsibly towards society, in relation to other mobile telecommunications companies.

At the same time, in 2006 Vodafone Greece was one of the companies in Vodafone Group which participated in the pilot GlobeScan Reputation Research project. The research was repeated in 2007, 2008 and in 2009. One of the key points revealed by the survey is a correlation between the importance of each sector examined (environmental responsibility for example) and Vodafone Greece's performance in that sector, as seen by the general public.

Moreover, we evaluate the positive perception of our actions in the Corporate Responsibility area, based on annual surveys conducted by independent firms in Greece.

2008-2010 Objective

1. Implement the action plan based on 2nd Stakeholder Engagement Survey results.
2. Carry out a 3rd Stakeholder Engagement Survey.

2008-2009 Result

1. Action plan implementation.

Degree of Success

1. 100%

► 2008-2010 Objective

Carry out a 3rd Stakeholder Engagement Survey.

Integrating responsibility into our Management Systems

At Vodafone Greece we have developed management systems which are certified by accredited bodies. In this way we ensure an even more systematic and efficient approach to Corporate Responsibility issues.

ISO 14001

The Environmental Management System we implement for all our operations has been certified according to the requirements of the ISO 14001 standard since June 1999 (Certificate No. 04.33.01/006 EL0T). In June 2008 the company's Environmental Management System was successfully re-certified by the certification body Lloyd's Register Quality Assurance (Certificate No. 362212D).

EMAS

In November 2003 we were the first mobile telecommunications company in Greece and the second one worldwide to receive certification under the European Union's EMAS. This system enables us to systematically manage those of our activities which impact on the environment and to provide information to the public through our Environmental Statement (Certificate No. EMAS EL-000011). In May 2006 the EMAS Committee unanimously decided to renew Vodafone Greece's registration in the EMAS Register for Greece (the renewal takes place every three years). The European Commission has included Vodafone Greece's actions on the official EMAS website as an example of systematic management of the environmental impact arising from company operations (http://ec.europa.eu/environment/emas/casestudies/vodafone_en.htm).



Vodafone Greece certifications

OHSAS 18001:2007

The Occupational Health and Safety Management System we implement for all our operations has been certified according to the requirements of the ELOT 1801 (OHSAS 18001, BS 8800) standard since June 1999 (Certificate No. 06.33.01/001 ELOT). In June 2008 the company's Occupational Health and Safety Management System was successfully re-certified by the certification body Lloyd's Register Quality Assurance (Certificate No. 362212/C).

ISO 9001

The Quality Management System we implement for all our operations has been certified according to the requirements of the ISO 9001 standard since March 1996 (Certificate No. 02.29.02-33.01/249.1 ELOT/IQNET). Since July 2002 the Quality Management System implemented at the Vodafone Greece's Shops has also been certified according to ISO 9001. This was an innovative step; Vodafone Greece was the first retail chain in the country to receive such a distinction. This certification ensures that all points of sale across the entire country offer the same high standard of service, follow the same procedures and implement practices focused on the customer. In February 2007 the company's Quality Management System was successfully evaluated by the certification body Lloyd's Register Quality Assurance (LRQA, Certificate No. 362212/A and 362212/B). In June 2008 the company was successful in obtaining ISO 9001:2000 re-certification for its Quality Management Systems for the company and the Vodafone Greece shops.

EAOT EN ISO/IEC 17025

Vodafone Greece, in March 2009, has pioneered once again within the Greek market, given that it is the first mobile telecommunications company in the country, to obtain certification from Hellenic Accreditation System (ESYD), in line with the requirements of the ELOT EN ISO/IEC 17025 standard, for its Environmental EMF Measurement Lab. The Environmental EMF Measurement Lab is fully equipped, and is staffed with scientific personnel who carry out radio frequency EMF measurements in line with national and international guidelines and standards, to ensure proper operation of the network and unwavering compliance with EMF exposure limits. This accreditation certificate demonstrates the Lab's problem-free, scientific and reliable work, for which it was audited by the Hellenic Accreditation System.

ISO 27001-2005 (BS 7799)

In 1999 Vodafone Greece was the first Greek, and one of the first European, networks to receive BS 7799 certification for its Information and Data Security Management System, designed to ensure maximum possible security and protection for customer's data and information (BS 7799). In June 2007 the company received certification under ISO 27001:2005, an update to the previous standard, which requires that 133 safety mechanisms and organisational measures relating to information security be put in place (LRQA, Certificate No. 362212/F).

In March 2005, Vodafone Greece was informed of a security issue in its network. Software foreign to the network and capable of performing interception had been installed without Vodafone Greece's knowledge in the network software created, supported and maintained by an external supplier. The foreign software was removed without delay and the Greek authorities promptly informed. The authorities conducted investigations and subsequently made the matter public in February 2006. As a result, the Administrative Authority for Secrecy of Communications imposed a €76 million fine on Vodafone Greece, which the company duly paid. Vodafone Greece is appealing this decision for annulment in the Council of State, which was heard on 5.12.2008. The decision is not yet made publicly available. Likewise, the National Telecommunications and Post Commission (EETT) imposed a €19.1 million fine on the company. The company has lodged an appeal against that decision before the Athens Administrative Court of Appeal.

Integrating responsibility into our organisational structure

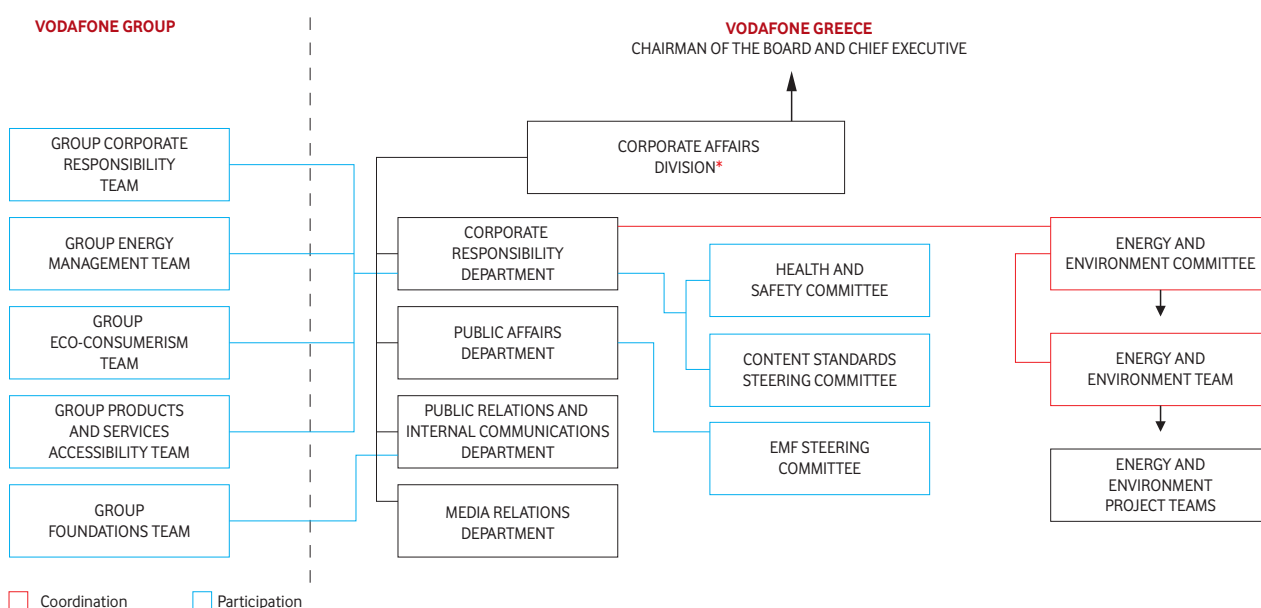
- Vodafone Group and Vodafone Greece have both set up Corporate Responsibility departments.
- The Vodafone Greece Corporate Responsibility Department participates in Vodafone Group Energy Management Team and in Vodafone Group Accessibility Team, ensuring consistency and harmonisation of local and global practices relating to energy efficiency, use of renewable energy sources and products and services accessibility.

- To ensure better coordination of Corporate Responsibility issues, Vodafone Greece has also established the following inter-departmental committees:

- the Energy and Environment Committee and Team charged with implementing sound environmental practices
- the Content Standards Steering Committee, charged with continuous monitoring of content issues, including adult services made available via mobile phones. It is also responsible for validating and implementing local policies and for adapting international Vodafone Group guidelines on this matter

- the Health and Safety Committee at work, responsible for identifying and investigating relevant issues and possible divergences from Greek legislation and company policies on employee Health and Safety issues
- the EMF (Electromagnetic Field) Steering Committee, responsible for implementing Vodafone Group policies on EMF and safety issues and for ensuring compliance with Greek legislation.

Vodafone Greece organisational structure for issues concerning Corporate Responsibility



* The Director is a member of company's Management Team with designated responsibility in his/her objectives for Corporate Responsibility.



Corporate magazine for employees

Evaluating our Corporate Responsibility performance

Based on procedures adopted by Vodafone Group in 2003, we evaluate our practices and activities on two levels.

Qualitative evaluation

All companies within Vodafone Group use an aggregated score, based on a common set of indicators, to assess the degree to which Corporate Responsibility practices have been implemented. This covers the following categories:

- Reputation Management
- Consistent Operating Standards
- Delivering on Promises
- Flagship Theme

Each indicator is scored, with a maximum score of 600 points. In the last quarter of 2008-2009 we achieved a total of 513 points (2007-2008: 488 points and 2006-2007: 239 points). This procedure is repeated at quarterly intervals.

Quantitative Evaluation

We collect performance data for the programs we implement. The data is organised by seven categories to enable comparisons of performance on a year-by-year basis.

- Energy efficiency
- Waste management
- Water
- Cooling - Fire suppressant systems
- Mobile phone, battery and accessory re-use and recycling program
- Legislative compliance
- Social investment

The results are collected quarterly and the consolidated results are included in this Report. There are over 300 indicators. Each year the indicators are revised to cover the material Corporate Responsibility issues.

Evaluating the reliability of our financial results

The US Sarbanes-Oxley Act was developed and adopted by the US Securities Exchange Commission (SEC) to promote the quality of financial reporting by:

- ▮ promoting basic principles of business ethics and corporate governance
- ▮ introducing internal mechanisms to manage business risks.

Given that the shares of Vodafone Group are also traded on US stock exchanges, Section 404 of the Act stipulates that the company should include the following information in its Annual Financial Report:

- ▮ a statement certifying the adequacy of the business procedures leading to financial reporting
- ▮ a certification of financial results through detailed internal audits and operational processes
- ▮ corrective actions, measures and controls regarding such results.

Since 2004-2005, Vodafone Greece has also started implementing Section 404, by documenting and evaluating the effectiveness of internal mechanisms for business risk management and the main processes and transactions leading to financial reporting. During 2005-2006, Vodafone Greece verified the implementation of corrective actions already identified and the effectiveness of all internal audits.

2008-2009 Objective

1. Properly implement and apply corporate processes, comments for improvement and audit mechanisms to ensure that the company's financial results are correctly prepared and reported.
2. Obtain validation of the above from the external auditors, who will certify the company's compliance with the requirements of the Sarbanes-Oxley Act.

2008-2009 Result

1. Successful assurance of proper implementation and application of corporate processes and control points, including corrective action changes required.
2. Validation of company's compliance (comments for improvement were included but these have no impact whatsoever on the financial results) by independent internal company auditors (Internal Audit), in accordance with the requirements of section 404 of the Sarbanes-Oxley Act.

Degree of Success

1. 100%
2. 100%

► 2009-2010 Objective

1. Properly implement and apply corporate processes, comments for improvement and audit mechanisms to ensure that the company's financial results are correctly prepared and reported.
2. Obtain validation of the above from independent auditors, who will certify the company's compliance with the requirements of the Sarbanes-Oxley Act.

Ensuring Business Continuity

A Business Continuity Management department has been existed within Vodafone Greece since 1997 and its objective is to ensure the continuity of essential business operations and critical services/processes in case of an emergency event or disaster, safeguarding the company's brand, reputation and revenue. During 2008, our business continuity planning activities continued to build upon all the work done since its establishment with the aim of:

- ▮ improving the existing business continuity plans
- ▮ testing the existing business continuity plans to ensure their effectiveness
- ▮ aligning business continuity management activities with the British Standard (BS25999).

► 2009-2010 Objective

1. Align the Business Continuity Management Policy with the relevant revised Vodafone Group Policy.
2. Enhance our testing process of business continuity plans.
3. Revise and further strengthen our crisis management framework.
4. Develop and implement employee awareness program on business continuity and crisis management issues.



Corporate magazine for employees

Performing internal audits of our operations

At Vodafone Greece, we operate an Internal Audit Process aimed at improving the business risk management mechanism within the company. This Internal Audit Process is an independent, objective consulting service which assesses the way in which the company operates and recommends optimisation measures, based on corporate governance and audit practices. Moreover, Vodafone Group's Internal Audit Division conducts an annual internal written evaluation of business risks in all operational processes of the companies in Vodafone Group. The related questionnaire includes a series of questions on Corporate Responsibility aimed at improving the company's performance both at local and international level.

The Chief Executives (CEOs) of local operating companies are responsible for signing these questionnaires, which underlines their importance. The above business risk assessment procedure constitutes the basis for additional audits in areas assessed as "high risk".

In addition to work strictly associated with the Sarbanes Oxley Act, at Vodafone Greece we use a self-assessment tool, called Key Control Questionnaire (KCQ), in order to evaluate the company's internal audit system. The KCQ for 2009 was also used to evaluate the company's compliance with Group Corporate Governance Policy Manual policies. After having been completed by process and policy owners, following a review and sign-off by the Chief Financial (CFO) and Chief Executive (CEO), the 2009 KCQ was submitted to the Group Audit Director.

Collecting, auditing and publishing data on our operations

In an effort to provide reliable and objective information, we collect quantitative data regarding our Corporate Responsibility activities. This procedure includes:

- identification of performance indicators
- recording of the sources of such information
- checking the correctness of such sources
- validation of data by a high-ranking executive within the company.

Corporate Responsibility data is subject to audits in the context of certification of:

1. the company's Environmental Management System according to the ISO 14001 standard and the European EMAS Regulation, included in the EMAS Environmental Statement, which is approved by the Ministry of Environment, Planning and Public Works and submitted to the competent body of the European Union
2. the company's Health and Safety System according to the OHSAS 18001 standard.

All information is available in:

- the Corporate Responsibility Report
- the EMAS Environmental Statement
- and on our website which is regularly updated.

2008-2009 Objective

Re-certification according to ISO 14001, EMAS, OHSAS 18001.

2008-2009 Result

Re-certification according to ISO 14001, EMAS, OHSAS 18001.

Degree of Success

100%

► 2009-2010 Objective

1. Successful evaluation of Management Systems implementation according to ISO 14001, EMAS, OHSAS 18001.
2. Renew Vodafone Greece's registration in the EMAS Register for Greece.

Exchanging examples of best practice

In the context of exchanging views, experience, examples of best practice and coordinating joint future efforts, twice a year, Vodafone Group hosts Corporate Responsibility conferences attended by the departments concerned from members of the Group worldwide. As a member of the Hellenic Network for Corporate Social Responsibility (CSR), Vodafone Greece was involved in publication of the second Greek catalogue entitled "Best Practices and Actions" with the following three best practices:

1. Parents Guide to Mobile Telecommunications
2. Recycle it (Mobile Phones and accessories recycling program)
3. Telemedicine

In October 2008, we participated in the workshop organised by Vodafone Spain at its headquarters in Madrid, with 8 Vodafone Local Operating Companies from around the world, for best practice exchange, regarding accessibility issues.

2008-2009 Objective

Exchange best practices.

2008-2009 Result

Exchange best practices regarding accessibility issues among Vodafone Group companies.

Degree of Success

100%

► 2009-2010 Objective

Exchange best practices.

Membership of international and national organisations

Both, Vodafone Group and Vodafone Greece are members of international and national organisations operating in the Corporate Responsibility area. In particular, Vodafone Group, and Vodafone Greece by extension as a member belong to the:

- World Business Council for Sustainable Development (WBCSD)
- Global e-Sustainability Initiative (GeSI)
- Business in the Community (BITC)
- International Business Leaders Forum (IBLF)
- CSR Europe

Likewise, Vodafone Greece is an active member of the Hellenic Network for CSR and founding member of the Business Council of the Hellenic Federation of Enterprises for Sustainable Development, which participates in the peripheral network of the World Business Council for Sustainable Development (WBCSD). Vodafone Group, and Vodafone Greece, as a member, are also members of the Dow Jones Sustainability Index and the FTSE4Good Index. For more information regarding the above organisations, for example participation start dates, please visit the relevant websites.

Communicating our Corporate Responsibility

In March 2007 we commenced the first integrated print campaign covering the Corporate Responsibility area, which was enhanced in 2008 with 3 new inserts (energy efficiency, proper use of mobile phones, Special Olympics events support). We focused on recycling programs, energy efficiency, products and services for the disabled, responsible use of mobile phones when driving, proper use of mobile phones by children, and social investment programs focused on children.

At the same time, in 2006, we set up the 1256 line (previously 1004), a four-digit number that customers (whether post- or prepay customers) can send an SMS to, free of charge, asking for information about any topic relating to Corporate Responsibility. Company customers receive a reply SMS and if the question requires a more detailed response, informative materials are sent to the customer. This number was launched in October 2006 and by March 2009 around 120 SMS had been sent, primarily with questions about the new leaflet "Parents' Guide to Mobile Telecommunications" as well as the handsets recycling program.



1.



2.

1. Mr. Stavros Dimas, EU Commissioner for the Environment, presents to Mrs. Angeliki Papantoniou, Vodafone Greece Corporate Affairs Senior Manager, the "1st Award on Sustainable Development Management"

2. Vodafone Greece info-kiosks at the "Doing Business Socially" conference

Moreover, we designed and created an interactive game, entitled "Mobile Invaders" aiming at informing and motivating employees and the general public on recycling, as well on responsible mobile phone use. The game, is available in java format via the VF live! services menu (download free of charge), as well as on the company's Global Intranet home page and the website in flash format. The game is available in the Greek and English language.

We supported the following conferences/workshops that promote the principles of Corporate Responsibility and convey them to the public:

- 11-12 April 2008: 4th pan-Hellenic Conference of the Inter Municipality Health and Welfare Network OTA: "Health Prevention and Social Care at Municipal Level".
- 16-18 May 2008: "Autonomia Expo 2008", for people living with disabilities.
- 9 June 2008: "Doing Business Socially 2008: Values and Practices of Responsible Entrepreneurship", organised by the Hellenic Network for CSR and the Federation of Industries of Northern Greece (FING).

In the workplace environment, which we consider as equally important, we took the following steps to provide our employees with more substantial information on the company's initiatives in relation to Corporate Responsibility:

- publication of articles in the corporate magazine "joy!"
- presentation of the results of our programs, prevailing global trends, and examples of best practices from other organisations on the company's Global Intranet
- distribution of the Vodafone Greece Corporate Responsibility Report for 2007-2008 in electronic format (after many employees relevant request in order to avoid paper use)
- posting Corporate Responsibility pop-up messages
- sending info messages via the company's customised electronic bulletin board
- providing a symbolic gift on the occasion of World Environment Day (employees were offered a discount to watch 'Earth is our Home' at the Foundation for the Hellenic World).

Vodafone Greece becomes a "Messenger" in Greenpeace energy-saving campaign

In May 2008 Vodafone Greece was dubbed a "Messenger" in Greenpeace's energy-saving campaign, thereby contributing to the environmental organisation's efforts to provide information and motivate both company employees and the general public to actively participate in combating climate change.

The company undertook the obligation to disseminate 10+1 energy saving tips, thereby spreading Greenpeace's optimistic message. The following actions were taken by us:

- Publication of articles in the corporate magazine "joy!"
- Use of pop-ups with Greenpeace's 10+1 energy saving tips
- Briefing and raising awareness among employees at the company's 4 office buildings by Greenpeace volunteers
- Briefing the general public by sending out press releases and inserting articles into newspapers with a wide-ranging circulation.

2008-2009 Objective

Continue the integrated Corporate Responsibility print campaign.

2008-2009 Result

Continue the print campaign based on a specific plan.

Degree of Success

100%

► 2009-2010 Objective

Continue the integrated Corporate Responsibility print campaign.

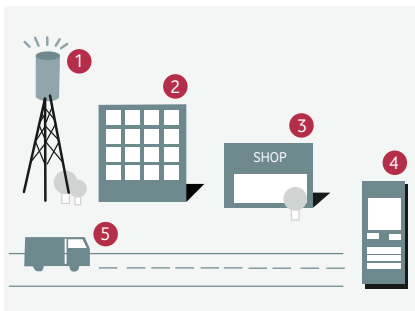


Environment

Vodafone Greece systematically implements environmental programs directly associated with the environmental impact of its operations which have been identified via **Risk Assessment**. These programs are managed as part of the **Environmental Management System** which is ISO 14001 and **EMAS** certified for all the company activities and facilities.

[...] At **Vodafone** Greece we systematically implement environmental programs

Environmental aspects of a mobile telecommunications company's operation



1 Electromagnetic fields

From the operation of the mobile telecommunications network, electromagnetic radio-frequency is transmitted to the environment, thus affecting it. Therefore, the network operation specifications should follow the limits set by international organisations (e.g. International Commission on Non-Ionizing Radiation - ICNIRP).

1 2 3 4 Energy

The energy that is consumed to cover the operational needs of the company is mainly produced from conventional energy sources (e.g. lignite, oil, etc.). The combustion of these sources results in the increase of carbon dioxide emissions to the atmosphere. Carbon dioxide is one of the greenhouse gases that lead to global warming and climate change.

2 3 Ozone layer (ODS)

Some cooling and air-conditioning systems use substances such as hydrochlorofluorocarbons (HCFC) that could damage the ozone layer.

1 2 3 4 Wastes

For the operation of the company, a wide range of materials is used (e.g. network equipment and mobile phones to office consumables) which after having reached their end-of-life, could be:

- ▢ re-used
- ▢ recycled, or
- ▢ disposed of at landfills or illegal dumpsites.

The last option hinders the danger of contaminating underground waters and the soil with heavy metals (e.g. lead, mercury, cadmium, etc.) or other dangerous substances.

1 2 3 Resources

Company operation requires the use and consumption of natural resources (e.g. water) and materials. This use causes the depletion of natural resources (e.g. water, minerals, trees, etc.), and the deterioration of the atmosphere, the surface and underground waters and the soil from the production of these materials.

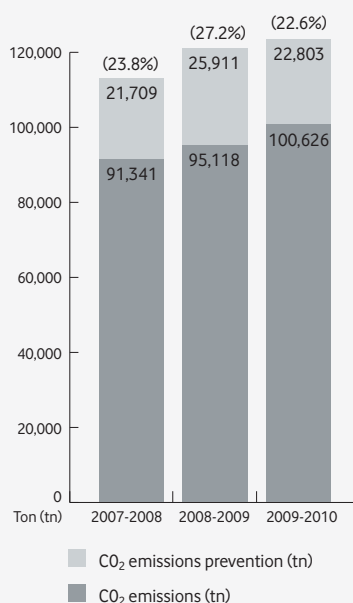
5 Transportation

Employee transportation to work along with business air-travel, contribute to global warming, air pollution, and the increase of road traffic.

1 Visual Impact

The operation of the company's mobile telecommunications network is based on Base Stations for the reception and transmission of radio's signals. These Base Stations could have a visual impact in urban, rural and environmentally sensitive areas.

CO₂ Emission Prevention from Vodafone Greece Programs



Preventing CO₂ emissions to the atmosphere

We are implementing programs to significantly reduce our network and offices energy consumption. In 2008-2009 we estimate that we prevented the emission of more than 25,000 tons of CO₂ into the atmosphere via our energy efficiency programs and the use of renewable energy sources at our offices and across our telecommunications network in general. These activities are outlined below. The cost savings from these energy programs implemented by the company are in the order of € 3,119,058, a figure which translates into 0.20% of overall company turnover. Measuring power consumption is a complex process and one that is being constantly reviewed given that there are no commonly accepted standards or examples from other companies to draw on.

2008-2009 Objective

1. Prevent the emission of 22,000 tons of CO₂.
2. Reduce CO₂ emissions by 40% per megabyte (MB) of network traffic using 2005-2006 as the baseline (2006-2011).
3. Reduce, by 2020, CO₂ emissions by 50% against 2006-2007 baseline (this is a Vodafone Group overall commitment).

2008-2009 Result

1. Prevention of the emission of 25,911 tons of CO₂.

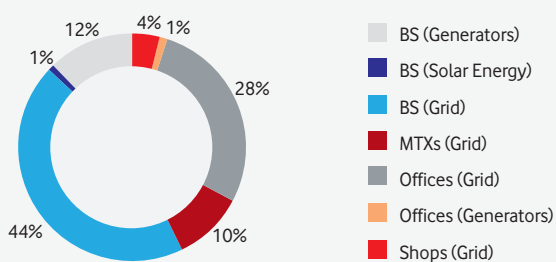
Degree of Success

117%

► 2009-2010 Objective

1. Prevent the emission of 27,000 tons of CO₂.
2. Reduce CO₂ emissions by 40% per megabyte (MB) of network traffic using 2005-2006 as the baseline (2006-2011).
3. Reduce, by 2020, CO₂ emissions by 50% against 2006-2007 baseline (this is a Vodafone Group overall commitment).

Energy Consumption Allocation 2008-2009



Innovating by using renewable energy sources

Green Base Station

We constructed a pilot "Green" Base Station which operates exclusively using renewable forms of energy in order to reduce cost and limit the environmental impact from the power generation and consumption requirements of the company's network. Oil-fuelled generator participates in a system which combines photovoltaic panels and a wind turbine, in order to cover the Base Station's power requirements. The second testing phase equipment is already in operation, which also has a central control system. Preliminary results indicate a reduction in diesel-fuelled generator output (in KWh terms) by 70% and in operating time by 95% with a corresponding reduction in environmental impacts (meaning less CO₂ emissions). The Base Station continues to operate on a trial basis and in parallel it has been re-designed so that it can be applied to network deployment.

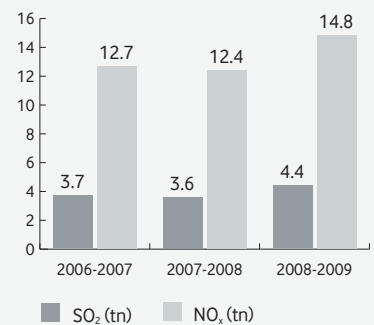
Photovoltaic Systems

At Vodafone Greece we utilise solar energy by installing hybrid photovoltaic systems at 125 Base Stations located in rural areas not covered by the national grid, operating with diesel fuelled generators. The energy produced by photovoltaic systems is around 1% of the total energy used by the network.

The use of photovoltaic systems:

- ▢ Reduces the consumption of liquid fuels used by the company in remote areas not connected to the power grid and therefore also reduces CO₂ emissions to the atmosphere.
- ▢ Reduces the future cost of constructing such systems making them more competitive compared to non-renewable sources.
- ▢ Makes them more widely known to the public, thus increasing their acceptance.

Sulphur dioxide (SO₂) and nitrogen oxides emissions (NO_x)



Saving energy across our network*

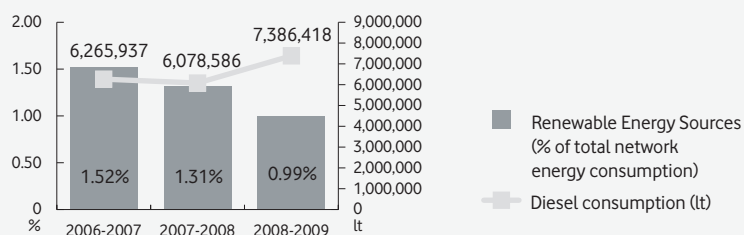
Heating/Cooling energy savings

At Vodafone Greece we save heating/cooling energy at Base Stations which account for around 50% of their total energy consumption. Savings are achieved by installing free cooling systems. Free cooling systems are cutting edge air-conditioning systems which use sensors and fans to reduce the operation time of air-conditioning units while maintaining areas adequately cool.

*

The company network includes Base Stations, Switching Centers (MTXs) and Data Centers.

Diesel Consumption / RES use





1.



2.



1. Photovoltaic System in Base Station

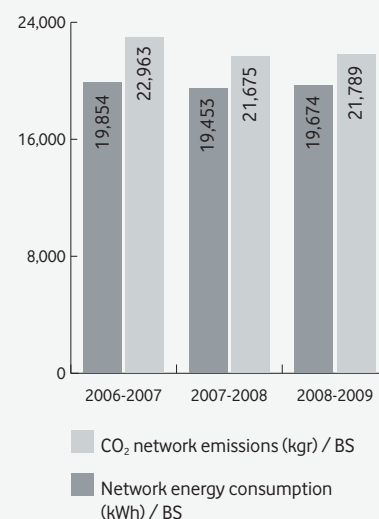
2. Pilot "Green" Base Station

In this way, these systems reduce energy consumption compared to conventional air-conditioners. This practice is applied at all new Base Stations that have air-conditioning units (approximately 35% out of total company's Base Stations), resulting in more than 60% cooling and heating energy savings. During 2008-2009, we proceeded with the upgrade of 80 conventional cooling systems into free-cooling. Since 2006-2007, we also modified the preferred heating/cooling temperature settings at all Base Stations (28°C cooling temperature and 10°C heating temperature), thus significantly reducing the energy used for heating/cooling purposes.

Base Station equipment

Given the development of the 3G network and the addition of new Base Stations, an increase in network energy consumption is expected. 3G equipment is primarily being installed at existing 2G stations with the aim of reducing the overall burden on the environment from the construction of new stations. Based on the current 3G equipment replacement, with new type equipment which is 50% more efficient, it is estimated that each of the current 3G facilities corresponds to an increase in energy consumption in the order of 20%, in relation to a 2G Base Station energy consumption.

Vodafone Greece Network Energy Consumption



2008-2009 Objective

20% savings in network energy consumption.

2008-2009 Result

30% savings in network energy consumption (18,136 MWh)

Degree of Success

150%

► 2009-2010 Objective

30% savings in network energy consumption.



Company Switching Centers (MTXs)

1. Kavala, 2. Kalohori (Thessaloniki), 3. Finikas (Thessaloniki), 4. Larissa, 5. Dasilio (Patra), 6. Patra, 7. Metamorfofi (Athens), 8. Paiania (Athens), 9. Kifissos (Athens), 10. Pireos (Athens), 11. Pallini, 12. Lykovrisi, 13. Syros, 14. Irakleio

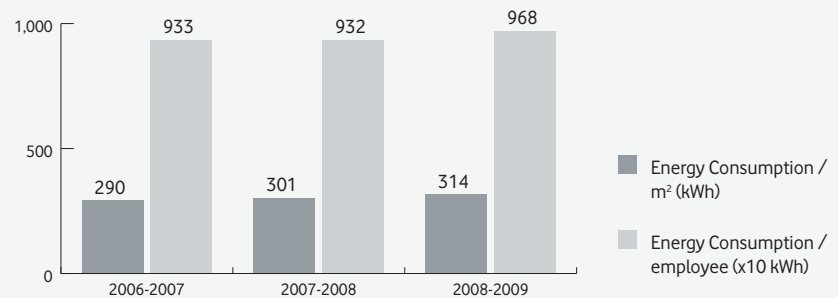
Saving energy at the company's offices

Since 2001, Vodafone Greece has been one of the 54 founding members of the GreenLight European program. This is a voluntary program where private and public organisations commit themselves to upgrading lighting efficiency at their building premises. The benefits of participating in this program are primarily environmental but also encompass cost savings. They include:

- ▮ energy savings
- ▮ reduced CO₂ emissions
- ▮ reduced operating costs
- ▮ prolonged lighting lifespans.

Today this specific practice has been extended to office space covering 44,000m² including the building complexes in Halandri, Kifissos, Lykovrysi, Pallini, Pireos and Thessalonika. Energy savings for lighting at the buildings applied exceed 20%. Since 2006, motion detectors were installed in the communal areas of the Halandri building complex (meeting rooms and WCs). Lighting in these areas is automatically switched on only when people are present thus avoiding power wastage.

Vodafone Greece Offices Energy Consumption



At the same time, the number of hours that lighting is on in the underground parking areas at the Halandri building complex was reduced to approximately 4 hours a day (in operation during employee arrival and departure times). During the rest of the day, only safety lighting is left on. The overall energy savings for lighting from these two measures are over 35%, in the applied areas.

Idle Power Demand

Since 2004 we have been taking the steps necessary to achieve power factor (cosφ) correction at the company's offices and switching centers (MTX) nationwide. The results of these steps have been that the power factor at offices and switching centers has improved significantly and is now close to unity (1). Significant economic and environmental benefits have been generated. For example, during 2008-2009 period, it is estimated that cost savings will be around € 40,220 while the corresponding reduction in energy consumption will be 6,438 MWRh (idle power megawatt hours). Power factor correction makes the national power transmission system more reliable. This is particularly important, especially during the summer, since it prevents power generation plants from overloading and also reduces the likelihood of transmission system failures in the form of extensive power blackouts.



1.



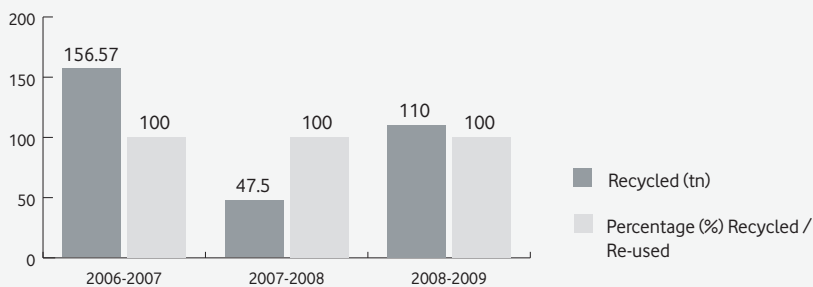
2.



3.

1. The European program "GreenLight" logo
2. Free Cooling System
3. Lead batteries

Lead Batteries (Pb) Recycling



In 2008-2009 the company withdrew back-up air-conditioning units with a total installed capacity of 664 kW at its offices and switching centers thereby generating major environmental and financial benefits. In 2008-2009, 15 MWh were saved, which corresponds to cost savings of around € 51,000.

The company also increased the preferred cooling temperature in special areas at company switching centers from 21°C to 22°C or 24°C depending on the requirements at each site. As a result of this specific step, 128 MWh were saved in 2008-2009, which corresponds to a cost saving of around € 10,000.

The overall energy consumption per m² results for 2008-2009 do not reflect the results of the individual energy savings programs which were implemented. This is due to the fact that total energy consumption at our offices also includes energy consumption from MTX equipment which is installed at office buildings, whose consumption levels are not affected by energy savings programs implemented at those buildings, and which is higher due to the increase in network traffic.

2008-2009 Objective

5% reduction in office energy consumption per m².

2008-2009 Result

4.3% increase in office energy consumption per m².

Degree of Success

0%

► 2009-2010 Objective

5% reduction in office energy consumption per m².

Recycling lead batteries

At Vodafone Greece we promote the recycling of lead batteries used by the company network. In particular, used batteries are sent for recycling to the approved battery and accumulator recycling body. During recycling, lead is recycled with the result that heavy metals are not disposed off to land-fill sites. Over the last two years more than 157 tons of lead batteries have been sent for recycling. The lead from batteries is a substance which bio-accumulates and can, if dumped in the ground, cause long-lasting damage to plants, animals and micro-organisms and therefore to humans via aquifers.

2008-2009 Objective

100% recycling of stored lead batteries.

2008-2009 Result

100% recycling of stored lead batteries (110 tons).

Degree of Success

100%

► 2009-2010 Objective

100% recycling of stored lead batteries.

Reducing paper consumption for company's operational needs

At Vodafone Greece we implement a program which seeks to reduce paper use. Over recent years the company has modified most of its computer software so that around 2,100 of its approximately 2,710 employees can print two or more pages on one sheet of paper (the others do not use computers in their day-to-day work or cannot print documents at all). In 2008-2009, paper use (A4 and A3) per employee reduced by 35.4%.

Since September 2007, all payslips have been available to Vodafone Greece employees exclusively in electronic format. This initiative resulted in a reduction in the paper used (for this purpose only) by approximately 85% (some of the employees print out the electronic version of the payslip), thus saving 5 trees approximately.

In order to drastically reduce the amount of paper used in printing bills, in February 2009 Vodafone Greece stopped sending out full analyses of calls to all postpay numbers held by company employees. The full analysis can instead be viewed online at My Account on www.vodafone.gr. Although the company allows any of its employees who so wish to continue receiving the full bill analysis, for some or all of their connections, 98% of employees have agreed to stop receiving the full analysis. This initiative will result in a saving of 640 kilograms of paper per year, which corresponds to around 11 trees per year.

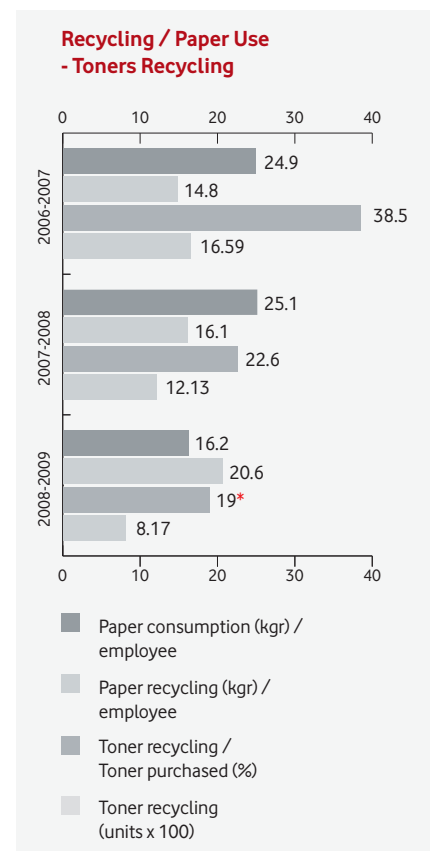
Recycling paper and toner cartridges

At Vodafone Greece, we implement a program that aims to recycle paper and toner cartridges. Specifically, we have installed:

- ▢ paper collection bins (240 litres) at central locations in the company buildings (such as printing and photocopying areas)
- ▢ paper collection bins (18 litres) in each office/workplace (in total around 2,200 bins have been placed)
- ▢ toner cartridges collection bins (100 litres) at central locations in the company buildings (such as printing and photocopying areas).

In 2008-2009:

- ▢ there was a significant increase in paper recycling per employee (28%)
- ▢ more than 56 tons of paper (office paper, advertising leaflets, packaging materials) were sent for recycling, saving more than 720 trees
- ▢ 817 toner cartridges were sent for recycling, a quantity corresponding to 19%* of those purchased by the company.



The use of paper and toners has a small impact on the environment based on the Risk Assessment carried out. However, it is one factor in our offices' operations which we have chosen to manage.

* This percentage does not correspond to the number of toner cartridges collected in 2008-2009 at the company's facilities for recycling purposes, but to toner cartridges sent for recycling via a specialist supplier. The toner cartridges collection process by a specialist supplier is not yet fully restored. All used toners - that derive from company's operation - remain stored at a specific location and the plan is to send them for recycling.



1. Paper collection bin

2. Toners collection bin

2008-2009 Objective

1. 2% increase in paper recycling per employee.
2. 5% reduction in paper use per employee.
3. 60% recycling of used toner cartridges.

2008-2009 Result

1. 28% increase in paper recycling per employee (20.6 kgr per employee).
2. 35.4% reduction in paper use per employee (16.2 kgr paper per employee).
3. 19% recycling of used toner cartridges.

Degree of Success

1. 1,395%
2. 708%
3. 31.6%

► 2009-2010 Objective

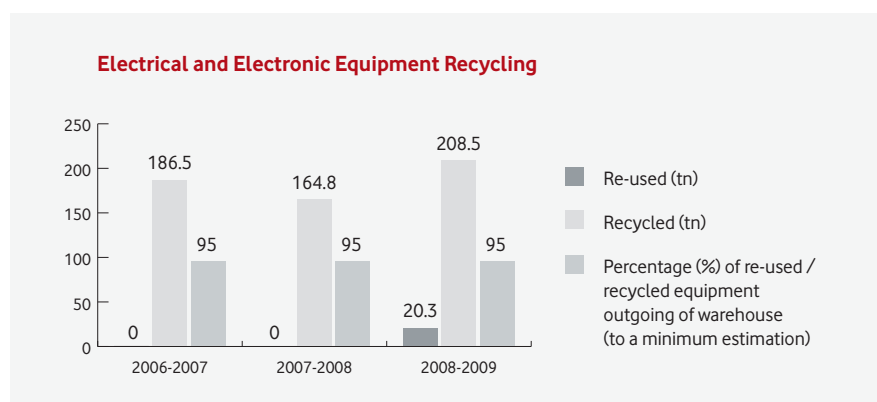
1. Extend e-billing practice to company's customers.
2. Maintain paper recycling percentage per employee according to 2008-2009 result (20.6 kgr per employee).
3. Maintain paper use percentage per employee according to 2008-2009 result (16.2 kgr per employee).
4. 60% recycling of used toner cartridges.

Recycling electrical and electronic equipment

In support of the "Reduce - Re-use - Recycle" principle, at Vodafone Greece we forward telecommunications equipment, computers, printers and monitors for recycling, in cooperation with the approved waste electrical and electronic equipment recycling body. In this way we are contributing to a reduction in the environmental impact caused by discharging heavy metals such as lead, zinc and cadmium in land-fill sites and dumpsites. Over the last 3 years (2007-2009) more than 555 tons of electrical and electronic equipment have been sent for recycling, which accounts for 95% of the equipment withdrawn.*

In 2008-2009 we extended the program to cover light bulb recycling as well. Special collection bins have been placed in company offices and switching centers to collect bulbs from building maintenance work and send them for recycling. Collection bins have also been placed at the entrances to our office buildings, so that company employees can recycle the lamp bulbs they use at home.

In addition, in 2008-2009 special collection bins were placed at 5 of the company's office buildings in Attica and Thessaloniki to collect small electrical and electronic appliances. Company employees now have the choice to recycle small household electronic and electrical appliances which they no longer use.



*

It should be noted that the recycling/re-use figures are practically 100% since each asset entering the warehouse is either recycled or re-used. However, in order to take into consideration the chance that certain equipment parts may not enter the warehouse this figure has been reduced to 95%.

Since 2006-2007, primarily with the assistance of Vodafone Group and in cooperation with suppliers of network equipment, we have ensured that the equipment used after 1.7.2006 complies with the requirements of Presidential Decree 115/2004 and does not contain hazardous substances whose use is prohibited.

2008-2009 Objective

Re-use and recycle 95% of electrical and electronic equipment leaving our warehouse.

2008-2009 Result

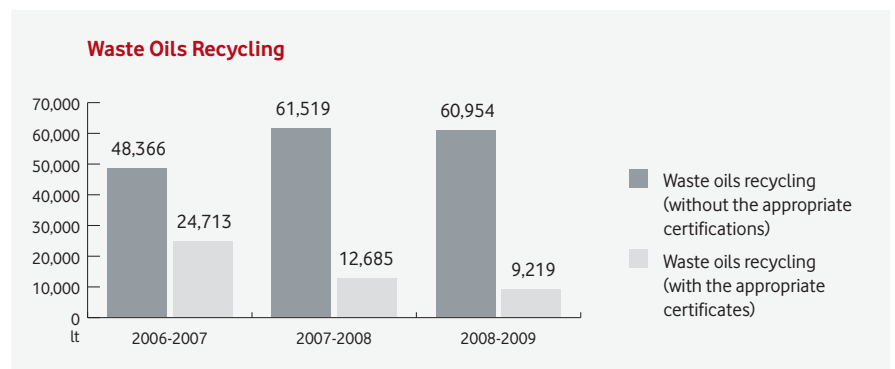
Recycling of 95% of electrical and electronic equipment leaving our warehouse (208.5 tons).

Degree of Success

100%

► 2009-2010 Objective

Re-use and recycle 95% of electrical and electronic equipment leaving our warehouse.



Implementing waste oil recycling

At Vodafone Greece we promote the recycling of waste oil, which is produced by the network and the company's buildings, in cooperation with the approved waste oil alternative management body. Waste oil recycling is standard practice by all Vodafone Greece installations. However, we have the proper documentation for safe management for just 13% of the waste oils that are being produced from company's activities, a result that does not satisfy us.

9,219 litres of waste oil were documented as having been sent for recycling in the 2008-2009 period.

2008-2009 Objective

Documented recycling of 100% of waste oils.

2008-2009 Result

Documented recycling of 13% of waste oils.

Degree of Success

13%

► 2009-2010 Objective

Documented recycling of 100% of waste oils.



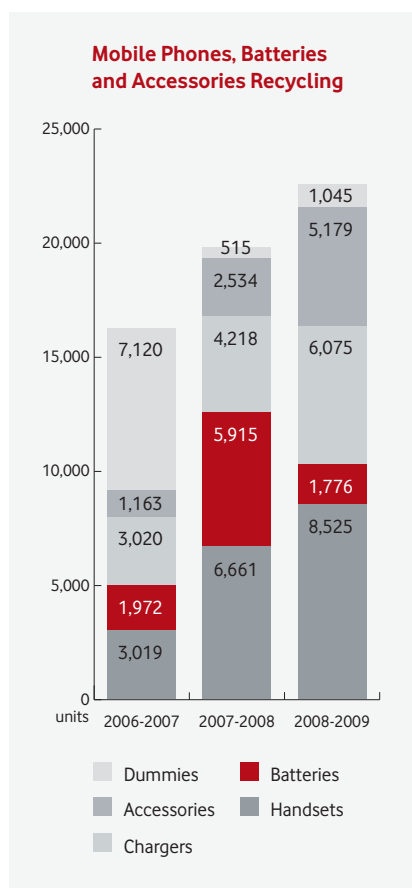
1. Mobile phones, accessories and household batteries collection bin
2. Internal activity for the promotion of mobile phones recycling program
3. Prize award to a Scouts of Greece Branch for its active participation in the mobile phones recycling program

Implementing a mobile phones, batteries and accessories recycling program

In June 2003 Vodafone Greece was the first mobile telecommunications company to implement a nationwide mobile phones, batteries and accessories recycling program. In 2008-2009 more than 22,000* mobile telecommunications products were collected in more than 900 special bins that had been installed at the Vodafone Greece's shops, at the company's buildings across Greece, at all Scouts branches and in 78 of the company's business customers. It should be noted that all mobile phone owners were able to participate in the program regardless of the network they use.

The company "spring cleaned" its warehouses and more than 35,000 mobile telecommunications products were sent for recycling.

* Quantities are calculated based on the date the mobile telecommunications items are sent to company's main warehouse.



Having collected the materials including spent mobile phones, batteries and accessories, they were sent to a specialised body authorised by the state which under Greek law is responsible for re-use, dismantling or further use of the materials for the production of other items. A mobile phone consists of other materials such as plastics and metals while the battery may contain chemical elements such as nickel or cadmium, which if dumped can affect aquifers and thus the environment overall.

Although the program is in its 7th year, public participation is not proportionally in line with mobile phone and accessory sales. According to available data, in 2008-2009 only 0.7% of the mobile phones sold from the Vodafone Greece shops during that period were actually collected for recycling at the shops and the company's buildings. Recycling of mobile phones in Greece is currently at an embryonic stage and we aim to raise public awareness that will prevent such materials from ending up in landfills or rubbish dumps.

In January 2009 the mobile phones and accessories recycling program operated at Vodafone Greece shops was extended to cover fixed phones, laptops, modems and other fixed telephony and internet equipment and accessories.

In the last couple of years, we have taken the following steps to raise awareness among the public:

- ▮ In February 2009 employees were once again called upon to become ambassadors of the mobile phone recycling program and to inform their friends and families accordingly. The aim of this initiative was to collect old and “forgotten” mobile phones.
- ▮ In collaboration with the Scouts of Greece, in May 2007 we placed 400 mobile phones and accessories collection bins at the Scouts branches across the country.
- ▮ In December 2007, we extended the mobile phones and accessories recycling program to our business customers. By March 2009, 78 business customers had installed Vodafone Greece’s 104 collection bins at their premises to collect mobile phones and accessories.
- ▮ In March 2009, Vodafone Greece partnered with P.A.O.K. F.C. and installed 3 collection bins at the team’s football grounds and also took a series of steps at the grounds to promote the program.
- ▮ In June 2008 and in view of the World Environment Day, we ran an extensive info-campaign to make the general public more familiar with Vodafone Greece’s mobile phones and accessories recycling program and to increase public participation in it. For example, the mobile phones and accessories collection bin “went out on a tour” to meet the public at T.G.I. Friday’s in Athens and Thessaloniki and at events organised by the Municipality of Neo Psychico.
- ▮ The print insert prepared in 2007 for this purpose, sought to inform and educate the public about the benefits of mobile phones recycling.

In 2006-2007, in cooperation with mobile phones suppliers, we ensured that mobile phones sold at the company’s shops after 1.7.2006 were in compliance with the requirements of Presidential Decree 115/2004 and did not contain hazardous substances whose use has now been prohibited.

2008-2009 Objective

15% increase in the number of mobile phones and accessories collected.*

2008-2009 Result

14% increase in the number of mobile phones and accessories collected (22,600 items collected).

Degree of Success

93%

► 2009-2010 Objective

15% increase in the number of mobile phones and accessories collected.

*

With the word “accessories” we refer to all mobile telecommunications items—besides mobile phones—which are included in the relevant chart.



1.



2.

1. Mobile phones accessories and household batteries collection bin

2. Small electrical and electronic appliances collection bin

Implementing a household batteries recycling program

The household batteries recycling program commenced on a pilot basis at the company's 4 central buildings in July 2004. Due to employee response, the program was extended in November 2005 to all Vodafone Greece shops and the company's buildings. Special collection bins have been placed at all Vodafone Greece shops and the company's buildings nationwide. The program was jointly implemented with the approved body for the collection of household batteries (AFIS) and by the end of March 2008 more than 14 tons (around 480,000 batteries) of spent batteries had been collected.

2008-2009 Objective

Collect 6 tons of spent household batteries (around 200,000 batteries).

2008-2009 Result

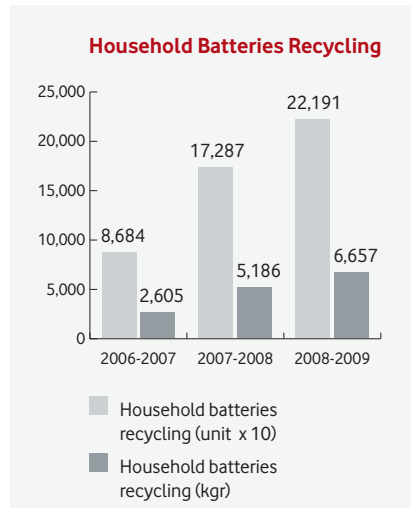
6.6 tons of spent household batteries collected (around 220,000 batteries)

Degree of Success

110%

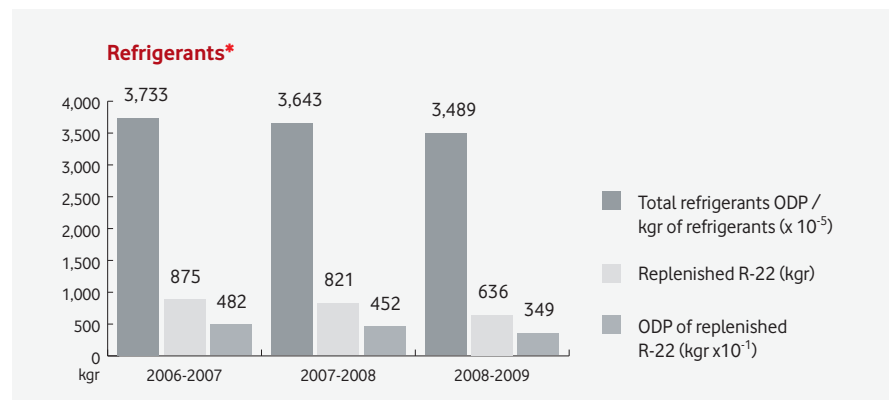
► 2009-2010 Objective

Collect 7 tons of spent household batteries (around 230,000 batteries).



Using more environmentally-friendly refrigerants and fire suppressants

In compliance with the relevant European Regulation, at Vodafone Greece we have already implemented a program to use more environmentally friendly refrigerants and fire suppressants in the equipment used at the company's facilities. Today, we only use fire suppressants with zero Ozone Depleting Potential (ODP) while as part of scheduled maintenance activities; we are gradually replacing old refrigerant systems which operate using HCFC R-22 with new ones which operate with zero ODP refrigerants.



*

Calculation of the ODP indicator for R-22 was based on a factor of 0.055.

In 2008-2009 the installed quantity of HCFC R-22 (a substance contributing to ozone layer depletion) reduced by 4%, while at the same time overall ODP of installed refrigerants also reduced by 4.2% in comparison to the same period last year. Finally, the number of breakdowns of refrigerant systems which operate using HCFC R-22 were limited, resulting in a 23% decrease in the quantity of R-22 being replenished.

2008-2009 Objective

5% reduction in the ODP indicator for refrigerant systems.

2008-2009 Result

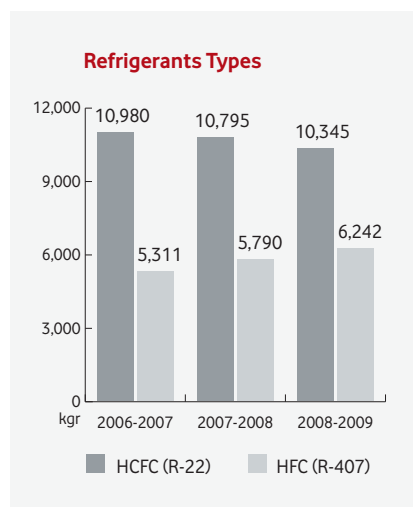
4.2% reduction in the total ODP indicator for refrigerant systems (already 0 for fire-suppressants).

Degree of Success

84%

► 2009-2010 Objective

5% reduction in the ODP indicator for refrigerant systems.



Monitoring the environmental impact of transport

Based on available data, fuel consumed by the Vodafone Greece corporate fleet of vehicles decreased by approximately 16% over the last year.

At the same time, the number of air miles travelled was down 40%.* Since 2008 Vodafone Greece has invested in developing video-conferencing infrastructure to replace the need for its executives to travel by air on business, resulting in a drop in CO₂ emissions from air travel.

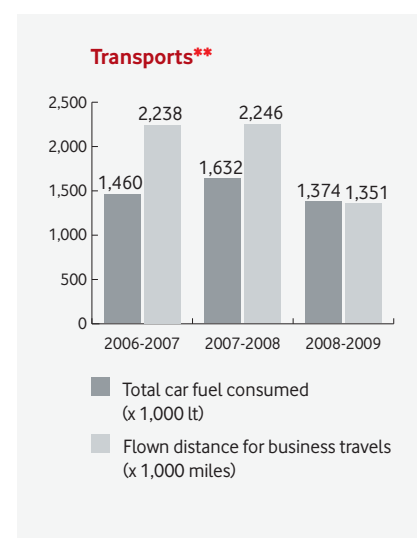
Fuel consumption used in road transport and the impact on the atmosphere from air travel by the company's executives is not one of the company's main impacts on the environment based on the results of the Risk Assessment of its operations.

2008-2009 Result

1. 16% decrease in fuel consumed by the company's vehicles.
2. 40% decrease in the air miles traveled.

*

We refer to travels abroad, since we have not developed a central mechanism for recording and monitoring travels within Greece.



**

Due to an improvement in how the air miles figures are calculated, there was a difference (increase) in previous years relevant data. The average distance travelled to the 4 most popular destinations (United Kingdom, Germany, Italy and Spain) is calculated and the resultant number is then multiplied by the total number of trips in the reference period.



1.

2.

1. The first "green" school in the Cyclades

2. Mobile phones, accessories and household batteries recycling leaflet

Participating in events to promote environmental responsibility

Vodafone Greece participates in the "Earth Hour" action against climate change


All Vodafone Greece's 418 shops actively participated in the "Earth Hour" global initiative organised by the environmental organisation WWF to combat climate change. All Vodafone Greece's 418 shops nationwide turned off their window display lights and store signs for one hour from 20:30 on Saturday, 28 March 2009. In line with safety regulations, emergency systems remained operational as always. Note that it is standard company practice that the lights at all Vodafone Greece's office building remain switched off during non-working hours.

The first "green" school in the Cyclades with Vodafone Greece's support

With Vodafone Greece's support, the Vivlos primary school on the island of Naxos prepared a design, purchased and installed a photovoltaic system to cover its electricity needs by utilising sunlight. It is estimated that the 2.4 kW photovoltaic system will generate around 3,480 kWh per year, which is a sufficient amount of energy to meet the school's electricity needs in conjunction with the wind turbine and photovoltaic system already in operation in the school grounds. When the photovoltaic system installed with Vodafone Greece's support becomes operational it will mean that the release of around 4 tonnes of CO₂ per year into the atmosphere will be avoided.

Vodafone Greece participates in Municipality of Paros event as part of the "Recycling starts at school" program

Vodafone Greece attended a celebration organised by the Municipality of Paros as part of the "Recycling starts at school" program to reward pupils who had collected the largest quantities of recyclable materials during the school year. During the event pupils, parents and teachers from the schools in the Municipality of Paros learned about the benefits of recycling mobile phones and accessories and about the company's programs in the energy savings and renewable energy sources sectors.



Mobile Phones - Masts - Health - Network Deployment

The rapid growth of mobile telecommunications has familiarised us with the mobile phones usage, but not with the technology required for their operation.

As a result, while most people demand to be able to use their mobile phones everywhere and at anytime, others are concerned about the mobile telecommunications network operation. At Vodafone Greece, we deploy our network of Base Stations in line with the guidelines issued by international scientific organisations and strictly comply with the standards adopted in relation to public exposure limits to electromagnetic fields.

[...] At **Vodafone** Greece we support the valid information to citizens on mobile telephony, technology and health issues

In Greece, according to the law (N.3431/2006), the adopted limits are 30% stricter than those contained in the Recommendation of 12 July 1999 of the European Community Council. This Recommendation is based on guidelines provided by the International Commission on Non-Ionising Radiation Protection (ICNIRP) and the World Health Organisation (WHO). In addition, mobile phones sold in the Vodafone Greece shops comply with the ICNIRP guidelines on restricting the exposure of people to radio frequency (RF) fields. At the same time, we are also implementing an integrated information program for stakeholders and citizens about issues arising from the operation of mobile telecommunications.

Public perception surveys on mobile telecommunications, technology and health issues

At Vodafone Greece every two years we carry out a quantitative and qualitative stakeholder survey as well as public perception surveys to measure their opinion about the company's responsibility on matters of mobile telecommunications, technology and health. The results from the last survey (2009) demonstrated that the main reason for concern among the public was lack of understanding of mobile technology, and in particular the need to operate antennas.

In particular:

- ▮ 67% of those questioned did not know that a nearby antenna is needed for a mobile phone to operate
- ▮ 79% of those questioned are not concerned due to personal reasons but because of the information they had heard/read about health issues
- ▮ 60% of those questioned requested more information about the way mobile phones and antennas operate.

Informing the public

- ▮ 3,425 copies of "The Apple of Discord: Technology, antennas, mobile phones, health" were distributed in 2008-2009 via the Vodafone Greece shops, by direct mailing or at info-meetings with Greek authorities, bodies, and the mass media. This brochure, as well as the concise version of it, explain issues such as how mobile phones work, why we need antennas, the global and national regulatory framework for mobile telecommunications and the views of the WHO and other respected international bodies on mobile telecommunications, technology and health issues in easy-to-understand language. References, bibliography and information sources have also been included for readers in search of further scientific information. In February 2009 we reprinted the brochure entitled "The Apple of Discord: Technology, antennas, mobile phones, health" and updated it with new information about mobile telecommunications, technology and health.

- ▮ We also designed and began to gradually implement an e-learning program entitled "Mobile Phones, Masts and Health" this year, aimed at all company employees. The program offers technically correct and scientifically documented information on all issues that staff should be fully and properly informed about so that they can answer any questions properly. 36% of employees have already taken part in the e-learning program.



1. "HERMES" program website
2. Mobile measuring station "HERMES"
3. Informative leaflet for "HERMES" program

Dialogue with Local Communities

We held more than 250 info-meetings with representatives of local government, national and regional media, associations and NGOs.

2008-2009 Objective

1. Conduct a public perception survey.
2. Communicate issues of mobile telecommunications, technology and health based on scientific developments in line with the needs of stakeholders and citizens.

2008-2009 Result

1. Qualitative and quantitative survey of general public conducted.
2. a. More than 250 info-meetings held.
b. 3,425 brochures distributed.
c. Company brochure updated and reprinted.
d. Specialised training course held in-house.

Degree of Success

1. 100%
2. 100%

► 2009-2010 Objective

Communicate issues of mobile telecommunications, technology and health based on scientific developments in line with the needs of stakeholders and citizens.

Supporting innovative University information programs

"HERMES" Program: 24-hour monitoring of EMF

The "HERMES" program is an innovative round-the-clock system for measuring and checking radio frequency electromagnetic radiation emitted to the environment from various sources such as radio and television station antennas, mobile telecommunications antennas and radars. The "HERMES" program is being implemented by the Mobile Radiocommunications Laboratory/National Technical University of Athens and the Radiocommunications Laboratory/Aristotle University of Thessaloniki.

In order to improve the program in terms of know-how and to respond to requests for the installation of more measuring stations, the "HERMES" program worked with the University of Piraeus' Internet and Telecom Systems, Services and Security Lab/Information Technology Department. The University of Piraeus is now the third university after the University of Patra and the Democritus University of Thrace to collaborate with the National Technical University of Athens and the Aristotle University of Thessaloniki, which have overall responsibility for managing the "HERMES" program. Program technological equipment has been sponsored by Vodafone Greece.

The University laboratories check and confirm the measuring apparatus and post the results of measurements on the program website www.hermes-program.gr on a daily basis. On the website visitors can search for all measurement results, find general information about EMF, the views of international organisations, the Greek legislation, sources of further information and an interactive e-learning tool. The program started back in November 2002.

In 2008-2009 the program was extended to 15 new locations. Today there are a total of 79 measuring stations in 26 prefectures around Greece. A program measuring station and an information stand, operate at the Thessaloniki Science Center and Technology Museum (NOESIS) with the support of Vodafone Greece. The HERMES SMS service also operates as part of the program, which allows Vodafone Greece subscribers, especially those with no internet access, to send a SMS free of charge from their Vodafone Greece mobile phone and receive information about EMF levels in the areas where "HERMES" program stations are in operation. In April 2008 the Aristotle University of Thessaloniki's Radiocommunications Lab began running the Mobile HERMES measuring station service which measures and records EMF along the length of major roads in the city.

The "ENIGMA" Information Program about EMF

The "ENIGMA" program is designed to develop a documentation center and to provide information to specialists and healthcare professionals providing public health and preventative medicine consultancy services. The program's scientific team records the level of knowledge among specialists and healthcare professionals about modern lifestyle and technological development issues in the field of mobile communications, and provides scientific guidance on those issues. The program has been running since November 2006 and is being implemented by the Health and Epidemiology Laboratory of the University of Athens Medical School and the Hellenic Society for Social Paediatrics and Health Promotion (HSSPHP). Vodafone Greece supports the "ENIGMA" program.

The program's scientific team updates the bibliography every year and reviews new scientific articles every year. It also conducts research to record the views and opinions of specific population groups in order to determine their level of knowledge about the impact of EMF.

An info-sheet and website have been prepared for the program (www.enigma-program.gr) with information about the technology used to generate EMF, bibliographic sources about the conclusions of well-respected scientific bodies, results of published surveys and polls/perception surveys on the level of knowledge among the general public and specialist population groups about EMF and health issues. Surveys are also conducted to record the views and opinions of specific population groups.

In 2008-2009, 9 info-seminars were organised for members of the Medical Association, health educationalists and medical schools. More than 600 people attended the seminars. At the same time, the program was presented to 15 Medical Conferences via an info-stand and relevant brochures were distributed. More than 2,000 brochures were handed out as part of the program.



1. Informative stand "HERMES" in the Science Center and Technology Museum
2. Monitoring Station "HERMES" in the Science Center and Technology Museum
3. Information program "Enigma"

2008-2009 Objective

1. Provide support for the actions of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the "HERMES" program to 25 new locations.
2. Provide support for information actions for the university programs "HERMES" and "ENIGMA".

2008-2009 Result

1. Support was provided for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki in extending the "HERMES" program to 15 new locations.
2. Support was provided for info-actions for the university programs "HERMES" and "ENIGMA":
 - a. New cooperation established with Piraeus University.
 - b. HERMES mobile service put into operation.
 - c. 9 educational seminars were conducted and attendance at 15 medical conferences.
 - d. Distribution of info-brochures.

Degree of Success

1. 60%
2. 100%

► 2009-2010 Objective

1. Provide support for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the "HERMES" program to 20 new locations.
2. Provide support for info-actions for the university programs "HERMES" and "ENIGMA".

Implementing the Health and Safety of RF Fields Policy

At Vodafone Greece we implement a Health and Safety for RF Fields policy that covers potential risks to the health and safety of employees and the general population from exposure to RF fields. The policy covers all phases in the lifecycle of Base Stations and terminals, from supply to commissioning and maintenance thereby protecting the safety of the general population. Special protective measures are also been implemented for all those people working at Base Stations.

Measuring exposure to RF fields from devices close to the body

Vodafone Greece requires that manufacturers of mobile phones sold at its shops take measures of the Specific Absorption Rate (SAR) for terminal use next to the ear in accordance with the European standard EN50360. The company has also innovated by requiring that manufacturers measure SAR values following the US Federal Communications Commission (FCC) measurement protocol for terminal use next to the body. These measurements are designed to check that the SAR is in compliance with the national and international standards. Such measurements must be performed by approved laboratories. At the same time, in cooperation with standards organisations, we are also promoting a new international protocol (IEC 62209-2) for body-worn measurements which was compiled in 2008 and will be published by 2010.

Responsibly deploying our network

Mobile telecommunications operation is based on a network of Base Stations which is used to transmit voice (conversations), text (SMS) and data (photographs, music, video, etc.). Studies show that the public is generally interested in how mobile telecommunications companies deploy their network. In addition to the national legislative requirements, Vodafone Group has also developed a specific policy and guidelines on Network Deployment which specify how the following issues are to be managed and implemented:

- ▮ radio wave emissions (see pages 27-41)
- ▮ environmental impacts (see pages 27-41)
- ▮ network location planning and selection
- ▮ communication with local government representatives and local communities living close to Base Stations
- ▮ relations with owners of Base Stations installation sites.

The extent to which Vodafone Greece implements Vodafone Group policy on Responsible Network Deployment is monitored using specific performance indicators which were developed in the 2006-2007 period.

Visual impact

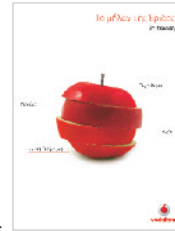
Aiming to reduce Base Stations visual impact, Vodafone Greece in 1998 began to design stylish small-scale antennas with a low visual impact in urban, semi-urban and sensitive surroundings.

In particular, Vodafone Greece:

- ▮ develops alternative methods for integrating antennas into the existing structure environment, so as to avoid interfering with the natural surroundings
- ▮ creates special installations at existing buildings and ensures co-location is achieved with other mobile telecommunications companies. In 2008-2009 there were 106 special constructions and 65 collocations
- ▮ special installations, which blend into the surroundings, are also used such as Stations in the shape of a palm tree or church tower, or even with the majority of the installations located underground. These special constructions relate to Base Stations located in areas of special interest such as archaeological sites or national parks.

Environmental impact assessments

Vodafone Greece also conducts environmental impact assessments (EIA) to ensure that any possible environmental impact during Base Station construction and operation is mitigated. However, in 6 cases a fine was imposed on the company (€ 97,000), due to lack of proper Base Station environmental impact assessments. The company will ensure that all Base Stations have the suitable studies required by the legislation. The complex, bureaucratic and time-consuming nature of the Base Station licensing and installation procedures hinders the development of mobile telecommunications and the uninterrupted communication between users. More than 18 government departments are involved in the licensing processes while the total amount of time required to obtain the necessary licenses for a Base Station may be as high as 2.5 years. In many cases, there are contradictory demands from the departments responsible for issuing the same license while certain departments stall or refuse to issue licenses, despite the legislation in force, based on arbitrary demands. Unfortunately, the new legislative framework has not resolved the majority of these problems, nor simplified these procedures.



1.



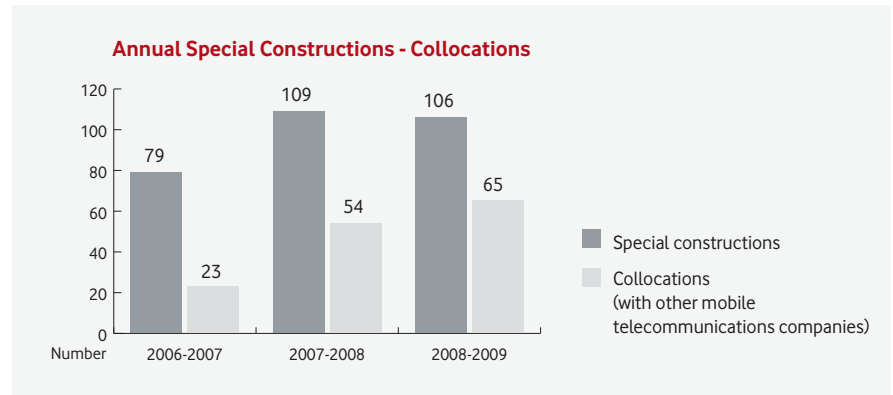
2.

1. "The apple of discord: Technology, antennas, mobile phones, health"

2. Base Station special construction

Relations with owners of Base Station installation sites

Owners of sites where company Base Stations are installed are major players when it comes to network deployment and retention. We designed and developed the sites owner call centre that handles a large number of questions and requests daily, enabling those requests to either be resolved immediately or sent to the competent departments for resolution. Moreover, the call centre also receives and handles requests directly related to Base Stations operations from public services, public authorities, company employees and associates. This enables us to address technical and procedural issues before they arise and to foster stronger ties with owners, thereby promoting long-term, robust relations with them. Our aim is to constantly improve the Base Station owner customer service levels by further developing the call centre so that it can handle the ever-increasing number of issues involved.



We carried out a satisfaction survey in 2007-2008 for sites owners where the company's Base Stations are installed. The objective was to determine their main expectations and areas where mutual relations could be improved. The main conclusions of the survey were:

- ▢ 73% of owners said they were pleased with their collaboration with Vodafone Greece and 86% were satisfied with the company's approach and the professionalism of its associates and employees.
- ▢ In general terms, owners appeared pleased by the direct response of the company to their requests.
- ▢ 87% requested an exclusive helpline for owners, while 74% wanted the company to organise face-to-face meetings with them on a regular basis.
- ▢ Almost 1 in 2 owners (46%) were concerned about mobile telecommunications and health issues, while 88% said it was very important for them to be kept informed at regular intervals about mobile telecommunications, technology and health issues.

2008-2010 Objective

Verification/Audit of the company's subcontractor' compliance with Vodafone Group Responsible Network Deployment policy.

2008-2009 Result

-

Degree of Success

-

► 2008-2010 Objective

Verification/Audit of the company's subcontractor' compliance with Vodafone Group Responsible Network Deployment policy.



Access to Communications

Our aim is to ensure that
the **benefits of mobile**
telecommunications are constantly
extended into other sectors while
at the same time making them
more accessible to an
increasing **number of people.**

[...] At **Vodafone** Greece we provide products and services that contribute to the equal communication for all people

Contributing to society and the economy

Today, almost 100% of the Greek population enjoys the benefits of mobile telecommunications making use of its services thanks to the major drop in prices offered by technological development. The telecommunications sector is one of the few sectors of the Greek economy where there has been a reduction in the cost of services provided over recent years.

Mobile telecommunications products and services have significantly shifted the way we communicate, work, interact and create. It enables us:

- to better organise our professional lives
- to manage and extend our social contacts
- to obtain better quality information
- to stay in continuous contact with our loved ones
- to directly and effectively handle emergencies.

At the same time, the rapid spread of mobile telecommunications has raised new questions about its use and impact (such as infringements of privacy caused by mobile phones conversations in public places). For this reason the company offers leaflets on these topics at the Vodafone Greece shops and on its website.

2008-2009 Objective

Leaflet dissemination (e.g. via website).

2008-2009 Result

Leaflet dissemination.

Degree of Success

100%

► 2009-2010 Objective

Leaflet dissemination.

Making our products and services available to everybody

At Vodafone Greece our aim is to provide products and services which ensure that all people can communicate on equal terms.

2005-2010 Objective*

33% reduction in the number of people who do not have access to our products and services.

2008-2009 Result

Provision of 6 products and services:

- a. "Telemedicine" program in remote areas.
- b. "Telemedicine" program at the Roma camps in Trikala and Sofades.
- c. "Vodafone Speaking Phone" for the visually impaired.
- d. Customer Service for the hearing impaired via SMS.
- e. www.blind.gr, triple informational portal for the visually impaired.
- f. Blind o.c.r. (optical character recognition) service via www.blind.gr portal.

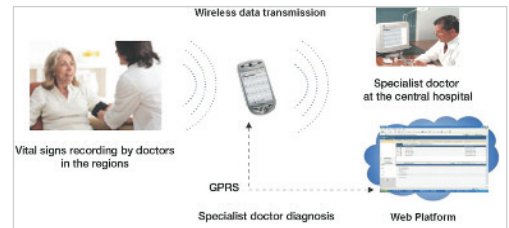
Degree of Success

100%

► 2009-2010 Objective

Maintain current products and services.

*
Vodafone Group deleted this specific objective due to the difficulty which rose in performance measurement.



Telemedicine program: Process of taking and sending examinations

Using mobile telecommunications technology to improve medical services

At Vodafone Greece in 2006 we started supporting a pilot program entitled "Telemedicine" at 5 regional clinics run by the Central Macedonia 2nd Health and Welfare System with the participation of Thessaloniki's Papageorgiou General Hospital and technical support from the company Vidavo.

Telemedicine refers to the procedure for obtaining patient examinations from a regional clinic for example and sending them to a central hospital to be examined by specialist doctors such as cardiologists. Telemedicine is based on mobile telecommunications technology and new generation medical devices. These devices permit patients to be examined using a cardiograph for example and for that data to be sent –via a mobile telecommunications network– to a central hospital to a specialist cardiologist who will receive the examinations and send back his diagnosis in the same way.

In order to implement the one-year long pilot program, equipment for monitoring vital life-signs (electrocardiographs, spirometers, oxymeters, manometers and glucosometers) and a PDA device were supplied to the Nea Pella Regional Clinic, the Sindos Regional Clinic - Diavates Health Center, Kontariotissa Regional Clinic - Lithoro Health Center, Malgares Regional Clinic and Skydra Health Center. At the same time the Papageorgiou Hospital has been supplied with suitable equipment, including a computer, to process and manage the medical examinations.

The benefits to patients is that they can practice preventative medicine, while at the same time geographical limitations are abolished and the sense of security felt by citizens is strengthened thanks to direct access to specialist doctors. Doctors can better manage their patients since they can provide specialist healthcare services in rural areas while at the same time they also have the opportunity to communicate with specialists.

In 2007-2008 the program was extended to 17 regional clinics in an endeavor to extend the benefits of Telemedicine to all of Greece. As part of the program, doctors and nurses from municipalities that are members of the Inter Municipality Health and Welfare Network OTA from around the country and four specialist doctors from the Athens Medical Center attended a training course on how to use telemedicine systems.

After the end of the training course the doctors and nursing staff from the municipalities were provided with equipment used to record life signs (electrocardiograph, spirometer, oximeter, manometer and glucosometer) and a PDA device. The training course organised and supported by Vodafone Greece was taught by instructors from Vidavo as was the pilot program in 2006.

The program is addressed to patients with chronic diseases (cardiopathy, hypertension, diabetes etc.). During 2008-2009 the peripheral medical offices, that participate in the program, sent more than 620 LOTs (1 LOT is a medical exam package that includes for example one cardiogram and one spirometer medical exam of the same patient).

Since 2006 Vodafone Greece has also been supporting the Municipality of Trikala's pilot Telemedicine program. Thanks to sponsorship of PDA devices and SIM/GPRS cards, participants in the program can now have their course of pharmaceutical treatment directly checked and adjusted by doctors at the Trikala Hospital using the Vodafone Greece network which carries the relevant data.

In 2008-2009 Vodafone Greece launched a new pilot Telemedicine program at the Roma medical and welfare centers in the Municipalities of Trikala and Sofades. The telemedicine equipment (sponsored by Vodafone Greece) will enable integrated primary healthcare services to be provided and data to be sent to a specialist when necessary, without the need to refer the patient to the specialist or without him or her having to travel to see the specialist. The program is being implemented in collaboration with the Trikala and Karditsa General Hospitals following decisions to that effect by the Boards of Directors of those Hospitals.

2008-2009 Objective

Expand Telemedicine program at the Roma camps in Trikala and Sofades.

2008-2009 Result

Program expansion.

Degree of Success

100%

► 2009-2010 Objective

Maintain and expand Telemedicine programs.

Access to communications for the visually impaired

Seeking to ensure that the disabled participate in life and have access to communication on an equal footing, we have developed another innovative service for the visually impaired called "Vodafone Speaking Phone". This service can be activated on conventional mobile phones and announces to users the information and functions which appears on the mobile phone's screen using "Real Speak" technology. Specifically:

- ▮ this service was developed to cover the specific needs of the visually impaired
- ▮ trials were conducted in cooperation with the Hellenic Technology for the Blind Development Association (STAT)
- ▮ it is available at all Vodafone Greece points of sale
- ▮ it can be activated free of charge for customers who present disability (blindness) certificates duly attested by public authorities
- ▮ it comes with an audio CD and instructions as well as a Braille leaflet
- ▮ information is immediately available by just calling 13830.

The functions spoken are SMS, incoming calls and other information, numbers per digit, per pair or all together, date and time, directory, battery status and network signal. By 31 March 2009 the service had been activated for more than 811 visually impaired company customers following a request made by them.



1.



2.



3.

1. Telemedicine program: Pulse Oximeter

2. Telemedicine program: Cardiograph

3. Telemedicine program: Spirometer

Supporting www.blind.gr; an innovative polymorphic information and communication hub for the visually impaired

Since May 2007 Vodafone Greece has been supporting www.blind.gr. This is an innovative by Greek standards information and communication hub for the visually impaired that has been developed by the Hellenic Technology for the Blind Development Association (STAT). The hub offers useful information on politics, technology, culture and sports and also features notices from relevant associations. It has an information management and upload tool which does not require any specific skills and was designed to be completely accessible by the disabled, since it is fully compliant with the relevant international standards (W3C). Information posted to www.blind.gr is available in real time simultaneously on the internet, mobile phone and fixed phone (from +30 210 5226600).

In Blind.gr participate leading bodies from the visually impaired community such as the National Federation for the Blind, the Pan-Hellenic Association of the Blind, among others, while it has received more than 17,500 visits to the website and 15,000 calls to the fixed line from May 2007, when the hub officially opened, to 31 March 2009. Moreover, the Center for Education and Rehabilitation of the Blind (CERB) also decided to post all national legislation and European Union directives concerning the visually impaired under its aegis to the "Legislation" section of its website.

In January 2009, after one month of pilot implementation, the services provided by www.blind.gr were expanded via the service blind o.c.r (optical character recognition). The most useful function that digital technology offers to visually impaired people is book reading, as long as its format is accessible via screen readers. The blind o.c.r. service offers a permanent, accessible and free solution that allows blind people to read books. Just by sending a book or a brochure in pdf and/or picture format to the e-mail address ocr@blind.gr, you will receive it in word document format, within short time via e-mail. All those enrolled (free of charge) at blind.gr have access to the service.

Access to communications for the hearing impaired

People with hearing impairments can communicate with Vodafone Greece's Customer Service Department. Users of this service can send complaints or request clarifications about how to use their mobile phones to the Customer Service Department by SMS and the Customer Service Department will reply in the same manner. The SMS is sent to 13830, in other words the same number which applies when placing an ordinary phone call to the Customer Service Department. Between the date when the service became operational (July 2005) and 31 March 2009 the Customer Service Department received more than 500 SMS concerning issues like services activation.

Offering special tariff plans for the hearing impaired

In order to facilitate people facing hearing impairments, since April 2002 the company has been offering a special post-pay and pre-pay tariff plan on the Greek market by name of "Vodafone Special". This plan offers a 50% discount per SMS to any network.

Offering free of charge access to social support lines

We offer our customers the ability to make free calls from their mobile phone to social support lines and the emergency services. During the period 2008-2009, the following lines received more than 133,000 calls.

- 1031: OKANA Drug Helpline
- 1147: Hellenic National Transplant Organisation
- 197: National Center for Urgent Social Aid
- 1066: Hellenic Cancer Society
- 1056: Smile of the Child
- 1145: Ithaki Helpline (Drug Addict Treatment Center Helpline)

At the same time, in 2008-2009 more than 4,300,000 calls were placed over the Vodafone Greece network to emergency services. The main volume was received by the Hellenic Police (100), and the National Center of Instant Help - EKAB (166). Moreover, Vodafone Greece also offers its customers the ability to send free SMS to the emergency services using short dialing codes:

- the Hellenic Police (100)
- the EKAB (166)
- the Fire Brigade (199)

In addition, Vodafone Greece supports the caller location information service and the common European emergency number 112, in cooperation with the Civil Protection Authority.

2008-2009 Objective

Retain the existing four-digit social support lines.

2008-2009 Result

Retention of existing four-digit social support lines.

Degree of Success

100%

► 2009-2010 Objective

Retain the existing four-digit social support lines.

Offering a solar mobile phone charger

In 2005 Vodafone Greece was the first mobile telecommunications company in the world to make a solar mobile phone charger commercially available via its shops. Using sunlight, this charger stores energy which is then used to power up the mobile phone, thus avoiding the use of electrical power and the consequent impact on the environment this has. The only thing required for it to work is sunlight and the charger can be used anywhere, even on the beach. It has also been designed so that it is compatible with most common mobile phones thus eliminating the need to change charger when you change mobile phone. It is worth noting that when a conventional charger is plugged in, it continues to consume power even if the mobile phone is not connected to it. On an annualised basis, this corresponds to one kilowatt hour of consumption or, expressed in other terms, one kilogram of CO₂.

2008-2009 Objective

Evaluate program's continuance.

2008-2009 Result

Program terminated due to lack of general public response.

Degree of Success

-



1.

2.

1. www.blind.gr - Information and communication portal for the visually impaired

2. "Vodafone Speaking Phone" audio CD user guidelines

Contributing to a reduction in telecommunication fraud

One of Vodafone Greece's initiatives since 2003 has been mobile phone theft reduction. In collaboration with the World Telecommunications Organisation and other Vodafone Group companies we have created and operate a database with the serial numbers of each stolen mobile phone which is recorded in the database on the owner's request. This means that it is impossible to activate these mobile phones on our network. In 2007-2008 around 500 stolen mobile phones were recorded in the database.

Our objective is to deal with this problem on a national level in cooperation with the competent independent authorities, mobile telecommunications companies in Greece and mobile phone manufacturers. However, this initiative did not elicit a suitable response from other mobile telecommunications companies and the competent public authorities with the result that in 2008 the service was suspended for holders of such handsets.

A basic reason for this decision was the high cost of maintaining and upgrading the necessary software for a free service and the fact that other providers were not offering a similar service with nationwide coverage.

2008-2009 Objective

Continue the program.

2008-2009 Result

Program terminated.

Degree of Success

0%

Collaborating with the academic community

In order to stay abreast of new trends which are emerging all the time in the mobile telecommunications sector, we collaborate with the academic community. We respond to students from universities and educational institutions who request information on our operations and procedures as part of the academic studies. Note that during 2008-2009 for example we replied to more than 60 student requests.

2008-2009 Objective

Continue the program.

2008-2009 Result

Replies provided to around 60 student requests.

Degree of Success

100%

► 2009-2010 Objective

Continue the program.



Customers

At Vodafone Greece **we develop**
and distribute innovative products and
services to better meet our **customers needs**,
communicate simply and clearly,
without hidden charges, **aiming** to provide
proper understanding of our messages from
all the consumers.

[...] At Vodafone Greece we implement responsible marketing practices

Implementing responsible marketing practices and communication of our operation

In seeking to set the standards for promotional advertising and marketing activities, since 2004, Vodafone Group prepared guidelines ensuring that the marketing communication material is legal, proper, fair, sincere and truthful. However, above all, these guidelines ensure that this material respects people's diversity regarding age, gender, race, religion and physical or mental capacity. At Vodafone Greece, just some of the responsible marketing practices we have implemented include:

- ▮ developing and distributing innovative products and services to better meet our customers' needs, offering them the maximum possible value in communication
- ▮ communicating without hidden charges, aiming to provide transparent information towards our customers
- ▮ communicating simply and clearly, aiming to provide proper understanding of our messages from all the consumers.

At Vodafone Greece our aim is to meet our customers' needs and expectations, and therefore we offer the following innovative products and services with tangible benefits for individual and business subscribers:

- ▮ We developed new postpay tariff plans for individuals taking into account the needs of subscribers for cost-effective, flexible communication. Subscribers can now choose from 8 different monthly fixed fees and can then go on to choose between two different types of tariff plans based on how they want to use up the services corresponding to the fixed fee.
 - a. Vodafone Economy postpay tariff plans, which offer airtime for phone calls (and/or video calls),
 - b. Vodafone Flexible postpay tariff plans, which offer airtime for phone calls (and/or video calls) and/or sms.

To advertise the new postpay tariff plans and to ensure that they were better understood by customers, we:

- ▮ prepared a new price list with itemised charges and disseminated this via all sales channels.
- ▮ communicated the itemised charges on the company's website.

- ▮ In July 2008 we gave our customers the option to choose a discount on their fixed monthly fee rather than a new handset subsidy. The monthly fixed fee discount ranged from € 42 to € 260 for the year and applied to both new and existing subscribers. Since the annual discount offered significant financial benefits to subscribers, it gave them an added incentive to hold on to their handset and thereby contribute to a reduction in the environmental impact deriving from mobile phones consumption (natural resources consumption and electrical and electronic equipment waste production).
- ▮ We offer Vodafone International, a prepaid tariff plan designed to cover the communication needs of immigrants by offering cheap airtime and SMS in Greece and their country of origin. Immigrants of all nationalities, especially those from Albania, Russia, the Ukraine, Bulgaria, Romania and Georgia, have:
 1. Lower airtime (per-second charging) and SMS charges:
 - for 49 countries abroad with per-second charging
 - to all networks in 6 selected countries (Albania, Russia, the Ukraine, Bulgaria, Romania and Georgia)
 - to all Vodafone International tariff plans.
 2. A pre-recorded menu in 6 different languages (to assist speakers of those foreign languages)
 3. A tariff plan guide and price list translated into 6 main languages.



✎ We also offer the Vodafone CU prepay tariff plan for younger people who have comparatively lower incomes than other age groups, which offers cost-effective airtime and SMS plans to meet the communication needs of young people who want to be able to talk with and send SMS to their friends cheaply.

1. Since October 2008, Vodafone CU has given old and new subscribers the ability to talk for 60 minutes a day by paying for just the first minute, thanks to the innovative new CU All Day service. This service allows Vodafone CU subscribers to talk for 60 minutes to other Vodafone CU and all fixed networks but to only pay for the first minute.

2. In January 2009, Vodafone CU presented the most advantageous offer of the year providing free airtime, video calls, SMS and MMS to all Vodafone CU mobile phones, as well as mobile internet for just €1 for all of 2009. Vodafone CU subscribers enjoy:

- 1000 minutes of airtime/video calls to other CU numbers
- 1000 SMS/MMS to other CU numbers
- 30 MB of mobile internet by paying just €1 once for the entire year and a €3 top-up card per month. This offer was available until 31.3.2009.

✎ Moreover, since December 2008 Vodafone à la Carte has been offering a unique new reward scheme for all its subscribers. Every time they top up their airtime old and new Vodafone à la Carte subscribers receive an additional free 45 minutes of airtime to all national numbers for ever.

✎ Vodafone Greece offered the following services to subscribers travelling abroad:

1. In June 2008 the fixed cost per call for the Vodafone Passport program for roaming calls from European countries was reduced from € 1 to € 0.80 for all program subscribers.
2. At the same time, the number of networks in the program rose to 41 covering countries outside of Europe as well.

We also took the following steps to ensure full comprehension and transparency in relation to prices and charges for all our products and services for individuals or businesses:

- ✎ preparation and updating of detailed tariff lists which were distributed to all sales channels
- ✎ tariffs are now displayed on the company website and updated after any changes
- ✎ reference is made to tariffs in each advertising flyer
- ✎ any change in tariffs or special offers is announced in the press
- ✎ use of letters, newsletters, microsites, presentations at meetings
- ✎ communications are clear-cut, avoiding any misleading statements about any restrictions on the services we offer.

We also place great emphasis on the feedback we receive from the public. Complaints concerning Vodafone Greece made to the company were as follows:

- ✎ 550 from the EETT
- ✎ 423 letters from the Ministry of Development etc.

2008-2009 Objective

1. Leaflet dissemination (e.g. via website).
2. Half-yearly checks of marketing materials to ensure they are compatible with responsible marketing guidelines.

2008-2009 Result

1. Leaflet dissemination.
2. Relevant check not conducted, due to responsible marketing guidelines revision.

Degree of Success

1. 100%
2. 0%

► 2009-2010 Objective

Yearly check of marketing materials to ensure they are compatible with responsible marketing, content and use guidelines.

Responsibly managing our services content

Vodafone Greece implements a procedure to manage the appropriateness of content, part of which is addressed exclusively to adults and is available via specific services. Users are obliged to verify their age before gaining access to the particular service. In addition, we help parents bar their children's access to such services. Moreover, since June 2007, we have been offering a special filter for users who do not want themselves or their children to have access to all Vodafone Greece content services aimed exclusively at adults, giving them the opportunity to deactivate access to that content.

Those users who do not wish themselves or their children to have access to all Vodafone Greece content services aimed exclusively at adults, can request deactivation of these services on their mobile, by calling the Customer Service Department and requesting activation of the "Minors Profile" for the specific number.

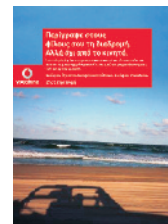
Moreover, the company's Content Standards Steering Committee constantly monitors the guidelines issued by Vodafone Group at international level and applies them in Greece. Its functions include procedures such as content and services classification, SPAM reduction, as well as briefings about the new communication methods via mobile phones (Social Networking, Instant messenger, etc) for non-adult users to ensure safer browsing.

Vodafone Greece and Greece's other mobile telecommunications companies have adopted the European Framework on Safer Mobile Use by Younger Teenagers and Children by incorporating it into the existing Code of Conduct for mobile phone value added services and protection of minor users, a self-regulation initiative of the sector in Greece. Some of the main objectives of this MoU are to develop mechanisms for controlling access to content unsuitable for minors, to categorise content so that content unsuitable for minors is clearly and immediately recognisable, and to prepare info campaigns for parents and children about safe mobile phone usage. At European level, Greece is one of the countries which has already implemented the majority of the provisions in the European Framework.

Vodafone Greece has been offering a leaflet called "Content Services Management Guidelines" since January 2005 that was sent to more than 800 company's stakeholders. At the same time, it was available via Vodafone Greece shops at a pan-Hellenic level and via the company's website.

In September 2007, we updated the leaflet in order to respond to ever increasing needs and expectations. This new leaflet, entitled "Parents' Guide to Mobile Telecommunications", was sent to more than 1,000 company's stakeholders, aiming to inform the public regarding the continuous development in services offered via mobile phones, as well as to provide practical tips to parents on how to direct children on responsible mobile phone usage, if and when they decide to give their children a mobile phone to use. At the same time, the leaflet includes useful information, about how to block children from accessing specific services aimed exclusively at adults. The guide starts with information on simple topics such as the SIM card, PIN, SMS and MMS, explains the services offered by mobiles such as Vodafone live!, internet and email access, and for the first time in Greece solves queries about new issues raised by the rapid development in communications such as blogs, malicious communication, nuisance messages, spam and viruses.

The "Parents' Guide to Mobile Telecommunications" is available at all Vodafone Greece shops and in the company's website. Lastly, the company website (www.vodafone.gr) has a special section with information about behaving responsibly when using chat services.



Informative leaflet on the use of a mobile phone while driving

2008-2009 Objective

1. Complete "filter" creation for enabling access barring from mobile phones to websites not-controlled by Vodafone Greece.
2. Re-evaluation of Code's content in cooperation with European and local institutions.
3. Leaflet dissemination (e.g. via website).
4. Apply local policy on mobile phone advertising.

2008-2009 Result

1. Achieve main part of technical implementation.
2. No need for re-evaluation. Continuous monitoring of national and international developments.
3. 35,000 "Parents' Guide to Mobile Telecommunications" leaflets were distributed.
4. Existing policy application.

Degree of Success

1. 75%
2. 100%
3. 100%
4. 100%

► 2009-2010 Objective

Provision of a total access control mechanism for non-adult users to ensure safer internet browsing via mobile phone.

Providing advice on the use of mobile phones while driving

Apart from being illegal, using a mobile phone while driving is truly dangerous because it distracts drivers and endangers both themselves and others. Greek law on this point prohibits the use of mobile phones and hands-free accessories.

Mobile phones can only be used while driving using a hands-free kit with voice activated dialling or answering or via a wireless bluetooth. Failure to comply is a fineable offence.

At Vodafone Greece, we are making every possible effort to provide systematic information on the proper use of mobile phones to all mobile telecommunications users, regardless of the network they use. The following initiatives have been taken:

- the leaflet "Mobile Phones and Driving" which is available at the Vodafone Greece shops and in the company's website, is distributed at conferences, etc. and was renewed during 2008 in order to be in compliance with the new Road Traffic Act
- information on the company website www.vodafone.gr
- a print insert was used to inform and educate the public about lawful use of mobile phones when driving.

2008-2009 Objective

Continue to provide information.

2008-2009 Result

Information provided via relevant leaflet and print insert.

Degree of Success

100%

► 2009-2010 Objective

Continue to provide information.

Informing and motivating the public

In an effort to systematically communicate with Vodafone Greece's customers, along with every monthly bill we send out a leaflet called "epafes", which is also available on the company website (www.vodafone.gr). During 2008-2009, "epafes" presented information on the following Corporate Responsibility issues:

- April 2008: We drive proper when we drive safely
- May 2008: Mobile phones and accessories recycling program at Vodafone Greece business customers
- June 2008: Vodafone Greece becomes a "Messenger" in Greenpeace's energy saving campaign.

Publication of the leaflet "epafes" was stopped during the year. We also provide systematically relevant information to the public through articles, special publications and various information inserts in high circulation newspapers and magazines. Finally, the company's website is constantly updated with any new information and/or the company's programs related to Corporate Responsibility.

2008-2009 Objective

Leaflets dissemination (e.g. via website).

2008-2009 Result

Leaflets disseminated.

Degree of Success

100%

► 2009-2010 Objective

Inform public on Corporate Responsibility issues via articles.



Supply Chain

At Vodafone Greece we expect all our associates to follow the practices included in the Code of Ethical Purchasing, which has been developed so as to set social and environmental operational standards.

[...] At **Vodafone** Greece we implement a Code of Ethical Purchasing

Applying the Code of Ethical Purchasing and supplier evaluation methods

Further to the collaboration with suppliers and NGOs organisations and based upon best practices, Vodafone Group has developed a Code of Ethical Purchasing so as to set social and environmental standards. Vodafone expects all its associates to comply with the Code. In particular, the Code concerns the following issues (for further information, please visit www.vodafone.com/CorporateResponsibility):

1. Child Labor
2. Forced Labor
3. Health and Safety
4. Freedom of Association
5. Discrimination
6. Disciplinary Practices
7. Working hours
8. Payment
9. Individual Conduct
10. Environment

Company suppliers and associates compliance with the principles of the Code of Ethical Purchasing is now a contractual obligation. These principles have been included in all contracts and in the amendments of those signed by the company with its suppliers and associates.

In 2008-2009, 17 of the company's main suppliers were asked to fill out an assessment questionnaire on the level of compliance with Ethical Purchasing Code principles. 14 of them responded positively (82% of those asked) and sent back the questionnaire, while the remaining 3 did not complete the questionnaire. According to results from the analysis of questionnaires, the suppliers who took part in the evaluation were complying at a rate of 81% with the Ethical Purchasing Code principles.

Supplier qualification procedure

Vodafone Greece has developed a special procedure which determines how the company commences collaborations with new suppliers. Any new supplier wishing to collaborate with Vodafone Greece should provide specific information to the company which permits it to carry out a Risk Assessment on issues relating to the Code of Ethical Purchasing. If the company is interested in commencing collaboration with a new supplier, the results of the Risk Assessment will show whether the supplier needs to fill out the Self-Assessment questionnaire or whether on-site inspections of the supplier's facilities should be carried out. Only when these procedures are successfully concluded can the supplier qualify as a potential company supplier. During 2008-2009, there was no need for an on-site audit of new suppliers, since none were rated as "high risk" supplier, based on the new supplier qualification procedure.



Supplier audits

In 2008-2009, we conducted an audit at 3 of the "high risk" suppliers. The audit resulted in the identification of 10 instances being identified where the suppliers undertook to take specific steps so as to improve their performance.

These instances included:

- ▢ environmental management (2 instances)
- ▢ labour issues (8 instances)

"Speak Up"

During 2006-2007, we launched the "Speak Up" program, a whistle-blowing mechanism that encourages suppliers and Vodafone Greece employees to point out any inappropriate conduct or practice by the company or its suppliers. Suppliers and Vodafone Greece employees have the ability to raise any concerns they have about the correctness of procedures and practices implemented by Vodafone Greece in the procurement sector by sending them to a specific email address. At the same time, Vodafone Greece undertakes to complete a timely investigation, follow-up and resolution of all issues reported.

2008-2009 Objective

80% of Vodafone Greece's main local suppliers should be informed about the company's Ethical Purchasing Code principles, actively comply with them and provide the company with compliance reports.

2008-2009 Result

82% of Vodafone Greece main local suppliers are informed about the company's Ethical Purchasing Code principles, actively comply with them and provide the company with compliance reports.

Degree of Success

100%

► 2009-2010 Objective

Planning corrective actions in collaboration with company suppliers who participated in the evaluation for 2008-2009 and who were found to be complying at a rate of less than 50% with the Ethical Purchasing Code principles.



Employees

We acknowledge that our business success and future development and growth as a company is based on our people who are Vodafone Greece's most important capital.

[...] At **Vodafone** Greece we aim to attract, develop and maintain the most capable employees

Our employees at a glance

In 2008 the company employed 2,641 people, 96.6% of whom were employed on the basis of open-ended employment contracts and 3.4% of fixed-term contracts. 54% of staff are women, 46% men and 91.4% of employees are aged 25 to 44.

It is company strategy to try and attract, develop and retain capable individuals to ensure that our business objectives and priorities are constantly attained. Our objective is to be an "employer of choice" for both existing and potential employees, by adopting structures and practices which seek to find and utilise people with talent and special skills.

Level of education	
Ph.D.	1%
Postgraduate studies	19%
University degree	22%
Technical Education Institutes	14%
College	7%
Institutes of Vocational Education	20%
High School	17%
Gender	
Women	54%
Men	46%
Age	
Minimum	18
Maximum	64
Average	33

At Vodafone Greece we offer all employees (100%) competitive pay, irrespective of whether they are on an open-ended or fixed-term contract or whether they work full-time or part-time. That pay is higher than the minimum salary set in collective labour agreements based on employee skill. We also offer side benefits.

Employees number

2008-2009	2,641
2007-2008	2,779
2006-2007	2,689

In addition, we have a stock option scheme for specific members of senior management, and we also have a reward scheme for all employees to recognise and reward innovative ideas and initiatives which seeks to bolster morale and employee dedication to the company. It is also company policy to tie pay to employee performance in achieving strategic objectives.

Human Resources allocation per Division

Division	Employees number	Percentage
CEO's Office	3	0.11%
Commercial Business	154	5.83%
Consumer Commercial	659	24.95%
Corporate Affairs	21	0.80%
Customer Services	875	33.13%
Finance	239	9.05%
Human Resources	49	1.86%
Legal	14	0.53%
Technology	472	17.87%
Regulatory & Interconnection	9	0.34%
Consumer Fixed Telephony & Broadband	11	0.42%
Information Technology	68	2.57%
Operations Development	59	2.24%
Vodafone Albania	8	0.30%
Total	2,641	100%



Age

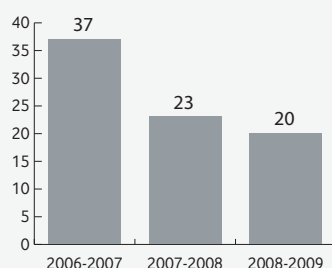
	2008-2009					2007-2008					2006-2007				
	<25	25-34	35-44	45-55	>55	<25	25-34	35-44	45-55	>55	<25	25-34	35-44	45-55	>55
Women	89	883	405	37	3	140	927	358	34	3	123	916	302	32	2
Men	40	631	494	47	12	61	681	508	43	14	37	726	478	59	14
Total	129	1,514	899	84	15	201	1,608	866	87	17	160	1,642	780	91	16

Turnover*

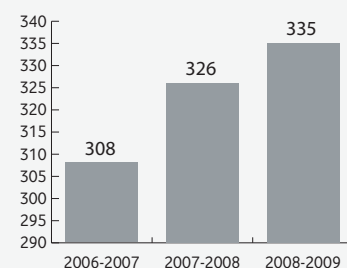
2008-2009	12.37%
2007-2008	10.35%
2006-2007	10.27%

*
The rate of staff turnover refers to the total number of voluntary leavers divided by the number of recruitments during each year and the number of employees at the start of the year.

Number of Involuntary Leavers



Number of Voluntary Leavers



New recruits

2008-2009	307
2007-2008	519
2006-2007	530

2008-2009

Contract type	Part timers	TEI practice	Full timers	Total
Open-ended	77	-	2,473	2,550
Fixed-term	14	3	74	91
Total	91	3	2,547	2,641

2008-2009

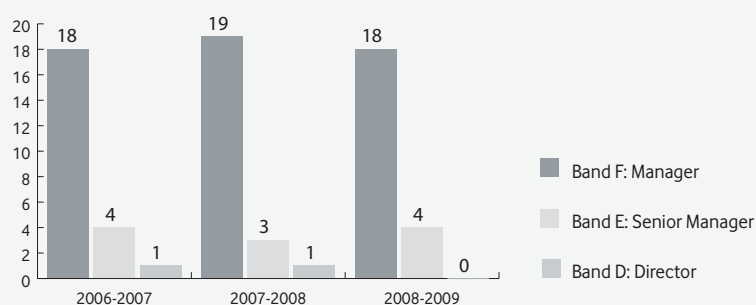
Contract type	Total	%
Open-ended	2,550	96,6%
Fixed-term	91	3,4%
Total	2,641	100%

Providing equal opportunities to our employees – Human Rights

Our aim is to create a working environment where Vodafone Greece's values can thrive, where there is respect for diversity, where people are treated with respect and dignity and where everyone has equal opportunities.

No case of racial or other form of discrimination was drawn to the company's attention via available communication channels. Women account for 54% of staff and 15.3% of managers are women. Moreover, 2 of the 12 members of the Management Committee are women.

Women in managerial positions per Managerial Band



In addition, there is no discrimination when it comes to employee pay. The same pay is offered for the same job irrespective of gender. The company does not hire minors and there is no such thing as forced labour.

Positions per gender

	2008-2009				2007-2008				2006-2007			
	Managerial	Staff	Managerial%	Staff%	Managerial	Staff	Managerial%	Staff%	Managerial	Staff	Managerial%	Staff%
Men	122	1,102	84.7%	44.1%	128	1,189	84.8%	45.2%	127	1,187	84.7%	46.6%
Women	22	1,395	15.3%	55.9%	23	1,439	15.2%	54.8%	23	1,352	15.3%	53.4%
Total	144	2,497	100%	100%	151	2,628	100%	100%	150	2,539	100%	100%



The gym in Vodafone Greece Headquarters in Attiki

Trade unions and collective bargaining

A European Employees Council has been established at Vodafone Group level, in accordance with the relevant EU directive and Presidential Decree 40/1997 to effectively safeguard employee rights to information and consultation within Community level undertakings.

A trade union has also been set up within Vodafone Greece to safeguard and promote the working, financial, and social security interests and the employees acquired rights and to improve those rights in qualitative and quantitative terms. Trade union activity and employer conduct are governed by the provisions of Law 1264/1982. Article 16(4) of that law states that company representatives must hold regular meetings with trade union representatives at least once a month.

Improving communication and the exchange of ideas

All our actions concerning Vodafone Greece's human resources are governed by specific work principles that promote respect and confidence building. Our objective is to create an open line of communication between the company and its employees. To this end, we use various communication tools such as:

- The company's in-house network (intranet)
- AIOLOS, a personalised system for providing online updates to all employees every day
- The corporate magazine 'joy!'.

These media are designed to keep employees abreast of company affairs (strategy, developments, new products and services, company initiatives) and to provide proper, up-to-date information about company policies and systems and to bolster corporate culture.

- An employee call line unifies all employee service procedures for a series of departments in order to make day-to-day work easier. In effect, a unified environment of phone lines and intranet gives Vodafone Greece employees the ability to easily contact other company departments. Line 3222, to which only company employees have access, can be used to make phone calls. It is accessible from corporate and employee number (a number that has no fixed fee and is offered to employees at preferential rates) and from office phones. 3222 offers a menu with the following options:

- Accounts, services and commercial policy (13830)
- Vodafone Greece Live, 3G, data services (13830)
- IT support (3800)
- Human resources (1700).

A human resources help desk (1700) has been in operation since April 2003, which answers questions from all company employees about pay, leave, overtime, internal job ads, Alico medicare and pension plans, training courses and other general work-related issues.

Over the last 6 months the help desk received 3,054 calls of which 2,484 were answered immediately by help desk staff and only 570 calls were further investigated and handled by the relevant departments.

Sharing our opinion

Direct communication with employees is one of the most important aspects of the Vodafone Greece corporate culture and a way of building stronger relations. At Vodafone Greece we carry out employee surveys at regular intervals to discover their views and how they feel.

Employee satisfaction survey

Once a year, all Vodafone Group companies, in collaboration with specialised external consultants, conduct an Employee Satisfaction Survey. This survey is a tool which enables the company to listen to employees' opinions on various issues relating to their level of commitment to the company, their views about their superiors, their career prospects, job security and work conditions, as well as their overall satisfaction, in relation to the measures taken for issues which arise. The survey focuses on 3 key aspects of human resource strategy (employer of choice – knowledge and development – high performance culture) and the results are evaluated in order to develop an action plan to improve specific sectors. Two key indicators in this survey are:

- ▢ employee commitment
- ▢ employee satisfaction with superiors management practices in each department.

These two indicators are a benchmark for the company both internationally within the Vodafone Group and locally within divisions. This year for the first time the manager satisfaction indicator played an important role in manager evaluation, since it is part of their objective for teams problem-free operation and for their personal development plan.

The results of the survey are discussed in-depth at meetings with individual divisions with employee participation and short-term and long-term action plans are prepared which are monitored in order to improve the areas which are highlighted.

In the Employee Survey 2008, Vodafone Greece reported a 90% level of employee participation compared to a corresponding figure of 83% at Vodafone Group level for this survey. The level of employee commitment in Vodafone Greece was 74% compared to a Vodafone Group figure of 73%, while the difference in satisfaction levels for managerial staff was 2%.

Strategy

In 2008 an initiative was commenced which was one of the most important findings of the previous survey in terms of corporate philosophy and culture. The idea of team work – communication – commitment is the basis of how we work and is the main area on which the action plan will focus for 2009-2010. In 2008-2009 a series of measures were implemented such as:

- ▢ Workshops to help understand and disseminate the new culture. These workshops kicked off with the company Management Team getting involved in interactive meetings and continued with all departmental managers and supervisors and then continued with a series of meetings with all employees.
- ▢ Cross-departmental projects to increase the interaction of divisions and actual knowledge of issues and experience for the customer.
- ▢ The "Make a Difference" reward program commenced, with the aim of (a) encouraging employees to take the initiative and propose innovative solutions that could be implemented which added value, and (b) rewarding those ideas which were put into practice.

► 2009-2010 Objective

Extend workshops, cross-departmental projects, and the "Make a difference" program.



Providing opportunities for life-long learning

Vodafone Greece's employees are the main driving force in implementing corporate strategy and achieving corporate objectives. For us at Vodafone Greece it is a moral obligation to ensure that employees are constantly growing and developing as people, in line with their potential and business needs. We ensure that employees are able to make career options at any given moment and can achieve their professional ambitions. In that light, there is ongoing dialogue with employees, an ongoing investment in knowledge and development of staff and in procedures which ensure that afore-mentioned plans are prepared and implemented.

The training and development strategy is inextricably bound up with the company's strategic objectives and corporate culture. Using "Performance Dialogue" and "Development Boards" procedures, supervisors exchange views about employees, agree of development actions, succession plans and the steps which ensure development and the retention of talented people by the company. These procedures have been designed to ensure that company employees can engage in life-long learning, training and development, while at the same time support their work and contribute to effective management of their career by equipping them with the necessary skills.

"Performance dialogue" is a form of ongoing dialogue with employees. It seeks to ensure that everyone falls into line with company strategy and to create development plans for every year which will assist employees in attaining their goals.

Each year all staff who have worked for the company for more than 3 months are evaluated. In an effort to bolster a meritocratic culture, "Performance dialogue" is accompanied by calibration meetings at the end of each fiscal year to ensure that the evaluation criteria are matched to the relevant roles across the entire company. "Performance dialogue" is a tool which ensures that both employees and their superiors are responsible for their development within a dynamic environment which offers opportunities for advancement.

"Development Boards" entail discussions about employee progress, succession plans, and the steps required in order to achieve company strategic objectives by properly preparing its human resources. These meetings are used to agree development plans for employees for the next 3 to 5 years. "Development Boards" help us identify and give development and advancement opportunities to employees via promotions and transfers to other departments.

2008-2009 Objective

Continue the annual program "Performance Dialogue".

2008-2009 Result

Program was continued.

Degree of Success

100%

► 2009-2010 Objective

Continue the annual program "Performance Dialogue".

The training plan is a key tool which offers various ways of contributing to employee career advancement and supporting the procedures referred to above. It covers seminars, interactive activities, e-learning and Vodafone Group courses for anyone who wants to take up a managerial post within the Group elsewhere in the world. The majority of courses are designed exclusively for our company. They include the "Executive Studies" course run in collaboration with the Athens Laboratory Business School (ALBA) which offers participants the chance to obtain MBA level knowledge based on Vodafone Greece standards. The company also invests in continuously training its employees by financing part of the cost of degree programs.

During 2008-2009, Vodafone Greece invested more than € 1 million in employee training. Employees attended an average of 4½ days of training and more than 79% of employees took part in training courses.

Training sectors we focus on are:

1. Training in products/services: To support new products and services, training is required for staff directly involved with technical and commercial issues.
2. Training in scope of work/specialisation: This training relates to the know-how needed by the employees in order to successfully perform duties.
3. Training in business skills/executives development: Business skills relate to how employees achieve their objectives, as well as the skills a supervisor has so as to develop and run his/her team effectively. This sector also includes international training courses which seek:

- a. to develop a common culture and leader skills
- b. to create a wider group, on a global level, that will bolster the exchange of opinions and practices.

4. Training in health, safety issues and handling emergencies: This training is primarily linked to the employees' wellbeing and their safety at work.

5. Orientation training: These training courses focus on the smooth incorporation of newly recruited employees into company's culture.

These sectors are covered by a combination of conventional training courses, e-learning, action, learning, workshops and recommended reading lists. Vodafone Greece ensures that the proper procedures and proper tools are available so that employees can effectively prepare their own development plan in collaboration with their supervisor and make the relevant commitment.

2008-2009 Objective

1. New personal development plan for 100% of employees.
2. Introduce new training programs for departments in constant contact with customers.
3. Run training courses to develop the company's executives in selected skills to bolster their role.

2008-2009 Result

1. Acquisition of a personal development plan for all employees.
2. Introduced new training courses for departments in constant contact with customers.
3. Ran training courses to develop company executives in selected skills to bolster their role.

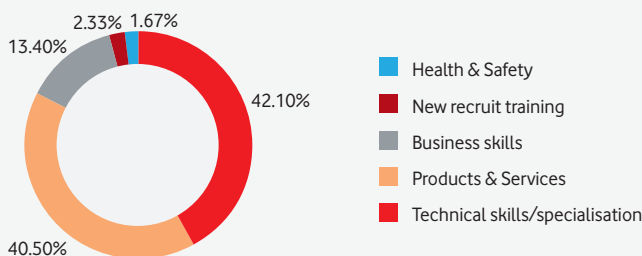
Degree of Success

1. 100%
2. 100%
3. 100%

► 2009-2010 Objective

Continue to bolster and support Vodafone Greece corporate culture by emphasising team work, communication and commitment to achieving business objectives.

The percentage of training hours per category of training





Vodafone Greece
Headquarters in Attiki

Strategic partnerships with universities

As part of our goal to develop the best working group and to provide an excellent work environment which encourages knowledge acquisition and personal development, the company has entered into partnerships with universities in Greece and abroad.

The program is aimed at specific universities which offer courses in issues of importance for the company. The partnership focuses on 4 key topics which generate mutual benefits for both the academic community and the company itself:

- Knowledge transfer via discussions between leading university figures, assignment and monitoring of dissertations in collaboration between students and their professors.
- Joint academic/scientific research with the involvement of company employees and research units from the specific universities.
- Cash prizes for the best students each year.
- Career options and short-term work experience positions (lasting 3-6 months) to enable students to acquire experience. In 2008-2009 the company developed a program for postgraduate students which enabled them to obtain an overall picture of the company and how it works by placing them in jobs in the company for 18-24 months. This program will be implemented for the first time in 2010.

These partnerships relate both to Greek public universities and university schools abroad with a global reputation.

Protecting employee health and safety

Health and Safety issues are managed in accordance with Greek laws and international standards (OHSAS 18001) with a system guaranteeing the health and safety of Vodafone Greece employees in all aspects of their work and focusing on risk prevention.

Since June 1999, we hold ELOT 1801 (OHSAS 18001, BS 8800) certification; proof of our response to the requirements for systematic management of employee health and safety issues for employees, associates and customers.

Achieving Health and Safety at work objectives is one criterion used to assess company executives and shows the priority attached to the specific issue (Safety First).

At Vodafone Greece we collaborate with Work Doctors and Occupational Health and Safety Consultants to cover the needs across all of Greece and provide advice and guidance about the measures to be taken to ensure the safety and mental and physical health of our employees. Safety Engineers and Work Doctors make regular visits to all company facilities (buildings, shops, Base Stations) and make recommendations towards Management about how the company can comply with Greek law and international standards.

A Health and Safety Committee has also been set up chaired by the Human Resources Director or the Occupational Health and Safety Officer, which also includes employees at all managerial grades and from all company divisions/ departments, who represent all company employees on Health and Safety at work issues. The Health and Safety Committee meets 4 times a year to prevent occupational risks and improve working conditions. Committee members are briefed about occupational accidents, are trained on Health and Safety at work issues to ensure that safety measures are complied within their workplace and also participate in developing company policies to prevent occupational risks.

We ensure that we are ready to deal with any emergency. To that end the company has prepared and implements an emergency plan at all its facilities and evacuation drills take place at least once a year at all company facilities. The company also makes use of Safety Volunteers who assist in evacuating buildings of colleagues, associates and customers if need be. Currently, there are 141 Safety Volunteers.

Vodafone Greece attaches great importance to protecting employees from occupational risks, monitors employee and associate accidents in the workplace and its aim is to ensure zero fatal accidents or major incidents and to constantly reduce the number of accidents involving employees and associates.

2008-2011 Objective

No increase in work-related accidents, within workplace, resulting in lost time (from the 2005-2008 baseline).

2008-2009 Result

4 work-related accidents, with minor injuries, resulting in lost time.

Degree of Success

-

► 2008-2011 Objective

No increase in work-related accidents, within workplace, resulting in lost time (from the 2005-2008 baseline).

In order to highlight those areas of the working environment and its processes requiring improvement, Vodafone Greece also monitors employee sickness and accident leave.

More specifically:

Ratio of direct staff days off work lost due to accident or illness *

2008-2009	1.60%
2007-2008	1.64%

*

The percentage of days off work lost due to accident or illness divided by the total number of working days.

Moreover Vodafone Greece offers all its employees:

- ▮ A Medicare scheme coupled with accident and loss of income insurance.
- ▮ Advice and information of how to prevent or deal with serious illnesses and health issues which are job-related (as part of its travel policy for example) or which relate to general issues which could affect company employees and their families (such as information about epidemics like the new flu).

Table of accidents

(all accidents cited involved loss of working time)

Fatal accidents involving company staff	0	0	0	0
Fatal accidents involving associates and contractor's staff	0	0	0	0
Third party fatal accidents (customers, etc.)	0	0	0	0
Uncontrolled work-related accidents (i.e. accidents which occurred one hour before or after working hours away from company facilities) involving company staff	13	22	11	16
Controlled work-related accidents (i.e. accidents at company facilities) involving company staff	4	1	2	3



Blood donation program

Voluntarily offering benefits to employees

The economic benefits offered by Vodafone Greece to employees include the Medicare scheme, Medicare for the disabled (whether employees or their children), a pension plan, stock options, preferential mobile phone usage terms, wedding and birth gifts, monthly meal allowance, discounts and special offers on company products, and discounts on car and home insurance premiums.

As far as the pension plan is concerned, Vodafone Greece offers all employees the opportunity to participate in a group pension plan. Employees who want to participate in the plan, pay mandatory monthly contributions which are withheld from their salary which are equal to a figure corresponding from 1% to 10% of their basic salary. The company pays monthly contributions for all employees participating in the plan equal to 3% of their basic salary. In addition the company seeks to ensure a balance between personal and professional life. Some of the actions implemented on the company's initiative include:

- implementation of favorable policies for working mothers during their maternity period
- flexible working hours regarding morning arrival times applicable to all employees (apart from those employed on shifts)
- implementation of a program of regular check-ups for employees and daily cooperation with Work Doctors. The above program applies to approximately 600 employees every year

- a fully equipped gym is in operation at the company's headquarters for employees to use and keep in shape. In addition a basketball team has been set up by the company which takes part in a company championship
- programs and activities are organised for employees' children such as a vocational guidance program implemented in collaboration with specialised work psychologists
- coordinating the participation of children in summer camps all over Greece and providing financial support
- hosting a children's party once a year for the children of employees at which gifts are distributed.

Implementing a blood donation program

Since 1996 Vodafone Greece has been implementing a blood donation program at the company's premises with the active involvement of employees. This voluntary blood donation program is run twice a year in cooperation with the Athens hospitals, Patissia General and Amalia Fleming, and the Thessaloniki hospital, Agios Pavlos. The resulting blood bank covers the needs of all our people and their close relatives. In 2008-2009, 299 employees took part in the voluntary blood donation program and 434 blood units were used by employees and their families.

2008-2009 Objective

Continue the program.

2008-2009 Result

434 blood units were used by employees and their families.

Degree of Success

100%

► 2009-2010 Objective

Continue the program.

Implementing a volunteering program

Vodafone Greece's people participate in the corporate volunteering program which from time to time is supplemented with new initiatives. The program started back in 2002 and related to collecting clothing and food for charitable organisations like Mediciens du Monde, the Greek Red Cross, the Strofi Treatment Center and individual families in the Municipality of Perama. During 2008-2009, around 24 hours were spent in implementing the program by a team of employees in the context of their day-to-day work while more than 1,000 items of clothing were distributed.

2008-2009 Objective

Continue the program.

2008-2009 Result

More than 1,000 items of clothing distributed.

Degree of Success

100%

► 2009-2010 Objective

Continue the program.



Social Investment

We consider it our obligation to improve the living conditions of specific social groups, especially children and the disabled, and to support environmental programs that contribute to a better quality of life for all of us. For this reason we are implementing multi-annual programs with measurable results in cooperation with leading organisations and foundations to provide information, raise awareness and to substantively improve the day-to-day life of less well-off population groups.

[...] At **Vodafone** we systematically invest in Social Investment programs, focusing on children and the environment

Respite Home for children suffering from cerebral palsy

The Respite Home for children suffering from cerebral palsy was established in 2003-2004 with our support to the Hellenic Cerebral Palsy Society. 500 m² of the Society's premises were dedicated to the Respite Home which includes 3 spacious bedrooms capable of sleeping 4 people each, a fully fitted bathroom, kitchen and staff quarters, living-room/library and veranda. Guests at the Respite Home can also use the Society's facilities such as the refectory, the swimming pool, sports facilities since the Respite Home operates on the Society's premises.

The children staying at the Respite Home do so, on average for one week, and at the Home have the opportunity to improve their social skills and participate in educational and leisure activities. At the same time, the Respite Home helps address the needs of families raising a child with cerebral palsy who have to be absent for a short time on business or to deal with family issues. The team staffing the respite home includes specialists and consists of therapists, social workers, nurses, physical education instructors, sociologists, and special needs teachers.

2008-2009 Objective

Accommodate 325 children.

2008-2009 Result

237 children accommodated.

Degree of Success

73%

► 2009-2010 Objective

Accommodate 260 children.

Educational program to prevent road accidents involving children

In 2005 we commenced collaboration with the HSSPHP and the Center for Research and Prevention of Injuries among the Young (CEREPRI) of the Athens Medical School to develop an innovative and creative education program. The program entitled "On the road safely" is aimed at school pupils, teachers and parents and seeks to prevent children being involved in road accidents. Starring "Prodromos", the program's loveable mascot, the program includes the following activities:

- ▮ educational material for kindergarten and primary school children
- ▮ teacher aids to promote program implementation
- ▮ workshops held in each area where the program is implemented with the involvement of local organisations, parents and teachers
- ▮ arranging activities with Prodromos for groups of children across the entire country

- ▮ satellite activities for junior high school pupils such as photography exhibitions, developing a website, setting up a newsletter
- ▮ evaluating the program via pupil and teacher questionnaires.

In 2008-2009, 10 workshops were held, 49 activities sessions for primary school pupils were organised with junior high school pupils and 27,559 info leaflets were sent out.

2008-2009 Objective

1. Organise 110 workshops with activities sessions and satellite activities.
2. Creation of new material for high school pupils regarding helmet use.

2008-2009 Result

1. 59 workshops with activities sessions were organised.
1. Creation of relevant DVD for pilot application.

Degree of Success

1. 54%
2. 100%

► 2009-2010 Objective

Evaluation of program's continuation.



1. Respite Home for children suffering from cerebral palsy
2. "LETO" mobile paediatrics and dentistry unit
3. Educational program for the prevention of road accidents involving children

"LETO" mobile paediatrics and dentistry unit

The "LETO" mobile paediatrics and dentistry unit established by Vodafone Greece and Medecins du Monde in 2003, travels around all of Greece to provide paediatric and dental care to children living in remote and underdeveloped areas which have no hospitals or health centers. The "LETO" unit provides the following services:

- paediatric examination and free treatment with basic paediatric drug provision
- dental examination and treatment with free distribution of dental hygiene and preventative dental medicine guidelines
- preventative hygiene and implementation of vaccination programs
- lectures on preventative medicine, healthy eating habit and oral hygiene and distribution of informative material.

2008-2009 Objective

Examine 9,000 children.

2008-2009 Result

5,306 children examined.

Degree of Success

59%

► 2009-2010 Objective

Examine 4,700 children.

"e-KIVOTOS" mobile consulting unit

"e-KIVOTOS" is the second mobile unit we have set up in cooperation with Medecins du Monde and it seeks to provide consultancy services to adolescents and young people in the 10 to 16 age bracket facing family, social or psychological problems. A double-decker bus has been transformed and renamed "e-KIVOTOS" having been fitted with computers with internet access via the Vodafone Mobile Connect service to welcome young people looking for information about the problems of concern to them.

The unit is staffed by three psychologists who provide information to young people about its role and the services offered and by a computer technician who provides instructions on how to use computers and the internet. Information is also available via www.e-kivotos.gr, a dedicated internet portal featuring information in categories concerning young people with detailed lists of articles on those topics. The content has been reviewed by a team of psychologists, social workers and doctors.

The subjects covered by the portal are:

- education
- relationships/psychology
- health
- family
- leisure/activities.

2008-2009 Objective

Contact between the unit and 5,300 children.

2008-2009 Result

Unit came into contact with 3,725 children.

Degree of Success

70%

Special Olympics Hellas

Since 2004 Vodafone Greece has been a supporter of the Special Olympics, for all the related sporting activities conducted across all of Greece. Since the establishment of the Special Olympics in Greece in 1987, the number of athletes who have participated has exceeded 11,000 and the number of volunteers 2,000. The aim of the Special Olympics is to create a feeling of respect for diversity and to defend the right of everyone to be involved in sports. The athletes stand out for their sense of fair play and offer unique moments of enjoyment in their every effort.

2008-2009 Objective

Support the 2009 Special Olympics events.

2008-2009 Result

Support for all Special Olympics athletic activities.

Degree of Success

100%

► 2009-2010 Objective

Evaluate program's continuation.

Children's Creative Workshops at the SOS Children's Villages

In 2005-2006 in cooperation with the SOS Children's Villages we established Children's Creative Workshops at the charity's premises in Athens and Thessaloniki. At the SOS Children's Village in the Vari area of Athens a building was fully equipped to house:

- ▢ an oral and visual arts workshop
- ▢ a theatre workshop
- ▢ a music workshop
- ▢ a new technologies workshop
- ▢ an English workshop.

In 2006-2007 the parental support counseling team began its work. At the SOS Children's Village in Northern Greece in the Plagiari area of Thessaloniki a building was fully equipped to house:

- ▢ an English workshop
- ▢ a music workshop.

The workshops were attended by children from the broader area, who along with children from the SOS Children's Villages developed their creativity and skills under the guidance of expert instructors.

2008-2009 Objective

1. Run the same number of workshops.
2. Present the works produced by children in Athens and Thessaloniki.

2008-2009 Result

1. Run the same number of workshops until the end of school year.
2. Present the works produced by children in Athens and Thessaloniki in June 2008.

Degree of Success

1. 100%
2. 100%



1. Special Olympics

2. Creative Workshops at the SOS Children's Villages

3. "Radio ELEPAP" radio station

"Radio ELEPAP" radio station

In 2005 we set up the "Radio ELEPAP" station for the mobility challenged. The station was set up together with the Hellenic Disabled Children's Society (ELEPAP) at its facilities. A modern, fully equipped radio studio was created to train participants in the scheme and record broadcasts. The aim of this endeavor is so that young people with mobility impairments can:

- express themselves, receive information and communicate via radio shows
- acquire and retain useful knowledge, skills and interests which will help them improve their life
- integrate into society more easily in the near future.

A team of experienced professionals has undertaken to train those participating in the "Radio ELEPAP" scheme to develop shows covering various subject matters. The shows are broadcasted by the Neo Iraklio radio station "Epikiononia 94FM" as part of the "Life Steps" show. An open line of communication was established with participants in "Radio ELEPAP" via the address radioelepap@yahoo.gr.

Vodafone Greece is also the lead sponsor of the Mamma-Mia event organised by ELEPAP to celebrate Mother's Day. The event was held in May 2008 at the Markopoulo Equestrian Center, attended by large numbers of children who had the opportunity to play and take part in various activities and show just how much they love their mothers via the wonderful handicrafts they made. The children also had the opportunity to participate in the environmental education and awareness program, organised by the Hellenic Ornithological Society, and sponsored by Vodafone Greece.

2008-2009 Objective

Continue to broadcast radio shows.

2008-2009 Result

Radio shows continued to be broadcast.

Degree of Success

100%

Communicating incentives for social awareness

Konstantinos Fikas and Yiannis Kostakis, Greek Paralympic medalists, have been appointed as ambassadors for Vodafone Greece's Corporate Responsibility program. They play a particularly important role in communicating the incentives for social awareness to children by holding talks at schools and educational institutions across the country. In cooperation with the Ministry of Education and Religious Affairs and local authorities we arranged for Konstantinos Fikas and Yiannis Kostakis to visit schools to allow school pupils to get to know the two medalists and to talk with them about their personal struggle to reach the top, the benefits of sports and fair play.

2008-2009 Objective

Visits to 10 schools and institutions.

2008-2009 Result

Visits to 9 schools and institutions.

Degree of Success

90%

Supporting children's foundations

During 2008-2009 we offered financial assistance to individual programs promoting child welfare which were implemented by institutions, agencies, NGOs and local authorities.

Educational film about the environment, entitled "Earth is our Home"

During 2007-2008, a new film called "Earth is our Home" was produced in cooperation with the Foundation of the Hellenic World and is currently being screened at the "Hellenic Cosmos" virtual reality theatre, "Tholos". It lasts 15 minutes and addresses environmental issues. The film was produced using cutting edge 3-D graphics and can only be seen at the "Tholos" theatre. "Tholos" resembles a planetarium in terms of shape and layout, but in effect the only thing they have in common is the hemispherical projection surface. This is a unique, virtual reality immersion experience which gets viewers directly involved, is flexible, innovative and captivating.

The film presents the environmental problems faced by the planet in a simple and real way, and also recommends day-to-day things we can do to address those problems (like energy efficiency, using renewable energy sources and recycling practices).

The film stars a polar bear and a fish who are affected by our approach to the environment, with the result that their lives are placed at risk. Starting from the images of the ice floes where the polar bear lives, the film takes us to the city and our day-to-day reality where alternative methods are proposed for a series of things we could all do in a much more environmentally-friendly way. This film is aimed at both adults and children. In the second half of the screening, viewers can test their knowledge and memory in a pleasant, interactive educational game.

2008-2009 Objective

28,000 visitors to watch the film.

2008-2009 Result

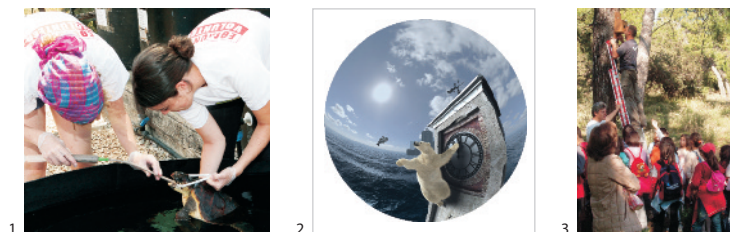
23,542 visitors watched the film.

Degree of Success

84%

► 2009-2010 Objective

24,000 visitors to watch the film.



1. Awareness program for the Caretta-caretta protection
2. Environmental Educational film "Earth is our home"
3. Environmental education and awareness program

Implementing an environmental education and awareness-raising program

In 2005-2006 we supported the Hellenic Ornithological Society in running the environmental education and awareness-raising program at the Antonis Tritsis Park. This park is one of the last wildlife reserves in the Athens urban environment and covers more than 100,000 m². It is located between the Municipalities of Ilion, Agioi Anargyri and Kamatero which are also involved in managing it. The environmental education program seeks to highlight the park's natural riches and raise awareness among the public, especially children.

In an age when most of Attica's wetlands have shrunk in size, the water courses in the park combined with the evergreen and coniferous trees, reed beds and farmland attract many species of birds and animal species all year round. Over the last decade members of the Hellenic Ornithological Society have been watching birds at the Park and have recorded 147 different species. Young and old visitors to the Park can:

- visit the Orientation and Information Center
- wander in the natural setting of the park grounds along special pathways
- learn about nature via info leaflets.

2008-2009 Objective

Participation of 5,000 children in the program.

2008-2009 Result

4,132 children participated.

Degree of Success

83%

Caretta-caretta sea turtle protection and information program

In 2007 we set up a Caretta-caretta protection and information program with the "Archelon" association which works to protect this species of sea turtle. The program is aimed at the general public, fishermen and people who love the sea. The purpose of the program is to inform people about how they can contribute to protecting and saving Caretta-caretta sea turtles on the beaches where they lay their eggs. During the summer, volunteers from the "Archelon" association visited beaches in the Peloponnese, Zakynthos, Crete and Attica, handed out info leaflets and explained to bathers how they can help protect sea turtles. At central locations in the same areas exhibitions with photographs, documentaries and info leaflets were also organised. During winter, volunteers informed fishermen and friends of the sea and people living by the sea about the same topics.

2008-2009 Objective

Association "Archelon" Care Center facilities improvement.

2008-2009 Result

20 new tanks installed.

Degree of Success

100%

Research program to monitor the brown bear

Since 2008 Vodafone Greece has been supporting a pioneering research program which has been implemented for the first time in Greece by ARCTUROS. The program utilises Vodafone Greece's mobile telecommunications network to monitor and protect the brown bear, from possible interruptions such as those deriving from major technical projects.

Specifically, ARCTUROS researchers fit bears with GPS-GSM locating devices, which do not interfere with the free movement and behavior of the animals. At designated times, each device links up to a satellite and stores the geographical location of the animal on a micro-hard disk. At the same time, it authors an SMS containing those coordinates and transmits it via Vodafone Greece's mobile telecommunications network to the computers at the ARCTUROS scientific center.

This enables exceptionally important data to be collected about the brown bear population and about relations between individuals within the population, the birth and death rate, and how their habitats are being used. Using this information the ARCTUROS scientific team can take preventative action, protecting the routes traveled by bears from possible damaging human activities, and can also submit specific technical proposals to ensure that the animals are able to remain in contact with each other.

► 2009-2010 Objective

Continue the program.

Supporting initiatives to promote the social good

In February 2006 the three mobile telecommunications companies Cosmote, Wind (former TIM) and Vodafone Greece set up the "Prospero" service to support and provide integrated management for charitable events like TV-marathons. This service allows certain 4-digit numbers to be used by the three companies for a specific time period. Customers of all three companies can send as many SMS as they want to the specific number during that period. Each SMS costs €1 plus VAT. The total net revenues (VAT excluded) which result from use of the service are paid over by the three mobile telecommunications companies to the institution body organising the charity event (by depositing it with the Deposits and Loans Fund).

It is worth noting that all three companies involved in offering this service gain no financial benefit from it and do not retain any sum for themselves, not even to cover operating costs. During the year 10 actions were implemented to raise funds for charitable bodies.

2008-2009 Objective

Continue the program.

2008-2009 Result

Program was continued throughout the year.

Degree of Success

100%

► 2009-2010 Objective

Continue the program.



1.



2.

1. Research program to monitor the brown bear

2. Booth in areas affected by fires

Responding to emergency situations

With the overriding aim of providing assistance to Southwest Greece and the Prefecture of Evia, which were hard hit by the destructive fires during August 2007, Vodafone Greece is implementing a support program to bring relief to the victims of August's forest fires. One of the vital social benefits offered by the program was uninterrupted access to communications. The Vodafone Greece initiatives which were completed in 2008 and which were designed to provide relief to our fellow citizens were as follows:

- Provision of 10 hours of free air time every month, for two months, for national calls.
- Construction and installation of 55 custom-made telephone booths in the fire-stricken areas. From September 2007 to May 2008 inclusive, a total of 106,494 free calls were made, involving local and trunk calls, as well as calls totalling 307,723 minutes to mobile phones of all providers.
- Financial support for 16 Municipal Districts in 11 Municipalities in the Peloponnese and 1 Municipality in Evia for the repair of damage to communal areas, sports grounds and playgrounds, the establishment of 2 libraries-study rooms in primary schools, and cleaning of a drinking water reservoir.

- 4 bobcat vehicles provided free to the Prefectures of the Peloponnese affected to open up roads and repair damage, as well as 2 fire trucks and 5 minibuses to transport pupils; 2 of the minibuses were specially adapted for people with disabilities.
- Free provision of 2 minibuses to Municipalities in the Prefecture of Evia to meet residents' needs.
- Medical and psychological support to our fellow-citizens who fell victims of the fire through the mobile units of Médecins du Monde supported by Vodafone Greece, "LETO", "e-KIVOTOS" and "ZOI". The "LETO" mobile unit provided paediatric and dental care to children, while "e-KIVOTOS" functioned as a counselling and psychological support unit for adolescents and youths from 10 to 16 years of age. The "ZOI" mobile unit was specially formed for the fire victims and offered primary healthcare to the residents.
- Visit by the Basketball Federation Coach, Panagiotis Giannakis, to the stricken areas of the Peloponnese, to offer a few moments of joy to the residents and, in particular, to children.
- A special bank account was opened with Alpha Bank where any Vodafone Greece employee could deposit money. In collaboration with the Greek Red Cross the company then purchased items needed which were specified by the organisation.

Areas where the program was implemented

Prefecture of Eleia

1. Municipality of Ancient Olympia
2. Municipality of Alifira (Kallithea)
3. Municipality of Zacharo
4. Municipality of Pinia - Simopoulo
5. Municipality of Oleni
6. Municipality of Skillounda

Prefecture of Messinia

7. Municipality of Kalamata
8. Municipality of Andania
9. Municipality of Ichalia

Prefecture of Laconia

10. Municipality of Therapnes
11. Municipality of Itylos-Areopoli

Prefecture of Arcadia

12. Municipality of Falesia
13. Municipality of Megalopoli
14. Municipality of Gortyna

Prefecture of Evia

15. Municipality of Taminea
16. Municipality of Konistra

Managing Corporate Responsibility		
2008-2009 Objective	2008-2009 Result	► 2009-2010 Objective
<p>1. Implement the action plan based on 2nd Stakeholder Engagement Survey results.</p> <p>2. Carry out a 3rd Stakeholder Engagement Survey (2008-2010).</p> <p>Properly implement and apply corporate processes, comments for improvement and audit mechanisms to ensure that the company's financial results are correctly prepared and reported.</p> <p>Obtain validation of the above from the external auditors, who will certify the company's compliance with the requirements of the Sarbanes-Oxley Act.</p> <p>■</p> <p>■</p> <p>■</p> <p>■</p> <p>Re-certification according to ISO 14001, EMAS, OHSAS 18001.</p> <p>Exchange best practices.</p> <p>Continue the integrated Corporate Responsibility print campaign.</p>	<p>1. Action plan implementation.</p> <p>Successful assurance of proper implementation and application of corporate processes and control points, including corrective action changes required.</p> <p>Validation of company's compliance (comments for improvement were included but these have no impact whatsoever on the financial results) by independent internal company auditors (Internal Audit), in accordance with the requirements of section 404 of the Sarbanes-Oxley Act.</p> <p>■</p> <p>■</p> <p>■</p> <p>■</p> <p>Re-certification according to ISO 14001, EMAS, OHSAS 18001.</p> <p>Exchange best practices regarding accessibility issues among Vodafone Group companies.</p> <p>Continue the print campaign based on a specific plan.</p>	<p>Carry out a 3rd Stakeholder Engagement Survey.</p> <p>Properly implement and apply corporate processes, comments for improvement and audit mechanisms to ensure that the company's financial results are correctly prepared and reported.</p> <p>Obtain validation of the above from independent auditors, who will certify the company's compliance with the requirements of the Sarbanes-Oxley Act.</p> <p>Align the Business Continuity Management Policy with the relevant revised Vodafone Group Policy.</p> <p>Enhance our testing process of business continuity plans.</p> <p>Revise and further strengthen our crisis management framework.</p> <p>Develop and implement employee awareness program on business continuity and crisis management issues.</p> <p>1. Successful evaluation of Management Systems implementation according to ISO 14001, EMAS, OHSAS 18001.</p> <p>2. Renew Vodafone Greece's registration in the EMAS Register for Greece.</p> <p>Exchange best practices.</p> <p>Continue the integrated Corporate Responsibility print campaign.</p>

Environment

2008-2009 Objective	2008-2009 Result	► 2009-2010 Objective
Prevent the emission of 22,000 tons of CO ₂ .	Prevention of the emission of 25,911 tons of CO ₂ .	Prevent the emission of 27,000 tons of CO ₂ .
Reduce CO ₂ emissions by 40% per megabyte (MB) of network traffic using 2005-2006 as the baseline (2006-2011).		Reduce CO ₂ emissions by 40% per megabyte (MB) of network traffic using 2005-2006 as the baseline (2006-2011).
Reduce, by 2020, CO ₂ emissions by 50% against 2006-2007 baseline (this is a Vodafone Group overall commitment).		Reduce, by 2020, CO ₂ emissions by 50% against 2006-2007 baseline (this is a Vodafone Group overall commitment).
20% savings in network energy consumption.	30% savings in network energy consumption (18,136 MWh).	30% savings in network energy consumption.
5% reduction in office energy consumption per m ² .	4.3% increase in office energy consumption per m ² .	5% reduction in office energy consumption per m ² .
100% recycling of stored lead batteries.	100% recycling of stored lead batteries (110 tons).	100% recycling of stored lead batteries.
2% increase in paper recycling per employee.	28% increase in paper recycling per employee (20.6 kgr per employee).	Maintain paper recycling percentage per employee according to 2008-2009 result (20.6 kgr per employee).
5% reduction in paper use per employee.	35.4% reduction in paper use per employee (16.2 kgr paper per employee).	Maintain paper use percentage per employee according to 2008-2009 result (16.2 kgr per employee).
60% recycling of used toner cartridges.	19% recycling of used toner cartridges.	60% recycling of used toner cartridges.
		Extend e-billing practice to company's customers.
Re-use and recycle 95% of electrical and electronic equipment leaving our warehouse.	Recycling of 95% of electrical and electronic equipment leaving our warehouse (208.5 tons).	Re-use and recycle 95% of electrical and electronic equipment leaving our warehouse.
Documented recycling of 100% of waste oils.	Documented recycling of 13% of waste oils.	Documented recycling of 100% of waste oils.
15% increase in the number of mobile phones and accessories collected.	14% increase in the number of mobile phones and accessories collected (22,600 items collected).	15% increase in the number of mobile phones and accessories collected.
Collect 6 tons of spent household batteries (around 200,000 batteries).	6.6 tons of spent household batteries collected (around 220,000 batteries).	Collect 7 tons of spent household batteries (around 230,000 batteries).
5% reduction in the ODP indicator for refrigerant systems.	4.2% reduction in the total ODP indicator for refrigerant systems (already 0 for fire-suppressants).	5% reduction in the ODP indicator for refrigerant systems.
	16% decrease in fuel consumed by the company's vehicles.	
	40% decrease in the air miles traveled.	

Mobile Phones - Masts - Health - Network Deployment

2008-2009 Objective

Conduct a public perception survey.

Communicate issues of mobile telecommunications, technology and health based on scientific developments in line with the needs of stakeholders and citizens.

Provide support for the actions of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the "HERMES" program to 25 new locations.

Provide support for information actions for the university programs "HERMES" and "ENIGMA".

Verification/Audit of the company's subcontractor's compliance with Vodafone Group Responsible Network Deployment policy (2008-2010).

2008-2009 Result

Qualitative and quantitative survey of general public conducted.

- a. More than 250 info-meetings held.
- b. 3,425 brochures distributed.
- c. Company brochure updated and reprinted.
- d. Specialised training course held in-house.

Support was provided for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki in extending the "HERMES" program to 15 new locations.

Support was provided for info-actions for the university programs "HERMES" and "ENIGMA":

- a. New cooperation established with Piraeus University.
- b. HERMES mobile service put into operation.
- c. 9 educational seminars were conducted and attendance at 15 medical conferences.
- d. Distribution of info-brochures.

■

► 2009-2010 Objective

■

Communicate issues of mobile telecommunications, technology and health based on scientific developments in line with the needs of stakeholders and citizens.

Provide support for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the "HERMES" program to 20 new locations.

Provide support for info-actions for the university programs "HERMES" and "ENIGMA".

Verification/Audit of the company's subcontractor's compliance with Vodafone Group Responsible Network Deployment policy (2008-2010).

Access to Communications

2008-2009 Objective

Leaflet dissemination (e.g. via website).

33% reduction in the number of people who do not have access to our products and services (2005-2010).

Expand Telemedicine program at the Roma camps in Trikala and Sofades.

Retain the existing four-digit social support lines.

Evaluate program's continuance (solar charger).

Continue the program for the reduction of the telecommunication fraud.

Continue the program of the collaboration with the academic community.

2008-2009 Result

Leaflet dissemination.

Provision of 6 products and services:
a. "Telemedicine" program in remote areas.
b. "Telemedicine" program at the Roma camps in Trikala and Sofades.
c. "Vodafone Speaking Phone" for the visually impaired.
d. Customer Service for the hearing impaired via SMS.
e. www.blind.gr, triple informational portal for the visually impaired.
f. Blind o.c.r. (optical character recognition) service via www.blind.gr portal.

Program expansion.

Retention of existing four-digit social support lines.

Program terminated due to lack of general public response.

Program terminated.

Replies provided to around 60 student requests.

► 2009-2010 Objective

Leaflet dissemination.

Maintain current products and services.

Maintain and expand Telemedicine programs.

Retain the existing four-digit social support lines.

■

■

Continue the program.

Customers

2008-2009 Objective

Leaflet dissemination (e.g. via website).

Half-yearly checks of marketing materials to ensure they are compatible with responsible marketing guidelines.

Complete "filter" creation for enabling access barring from mobile phones to websites not-controlled by Vodafone Greece.

Re-evaluation of Code's content in cooperation with European and local institutions.

Leaflet dissemination (e.g. via website).

Apply local policy on mobile phone advertising.

Continue to provide information on the use of mobile phones while driving.

Corporate Responsibility leaflets dissemination (e.g. via website).

2008-2009 Result

Leaflet dissemination.

Relevant check not conducted, due to responsible marketing guidelines revision.

Achieve main part of technical implementation.

No need for re-evaluation. Continuous monitoring of national and international developments.

35,000 "Parents' Guide to Mobile Telecommunications" leaflets were distributed.

Existing policy application.

Information provided via relevant leaflet and print insert.

Leaflets disseminated.

► 2009-2010 Objective

■

Yearly check of marketing materials to ensure they are compatible with responsible marketing, content and use guidelines.

Provision of a total access control mechanism for non-adult users to ensure safer internet browsing via mobile phone.

■

■

■

Continue to provide information.

Inform public on Corporate Responsibility issues via articles.

Supply Chain		
2008-2009 Objective 80% of Vodafone Greece's main local suppliers should be informed about the company's Ethical Purchasing Code principles, actively comply with them and provide the company with compliance reports.	2008-2009 Result 82% of Vodafone Greece main local suppliers are informed about the company's Ethical Purchasing Code principles, actively comply with them and provide the company with compliance reports.	► 2009-2010 Objective Planning corrective actions in collaboration with company suppliers who participated in the evaluation for 2008-2009 and who were found to be complying at a rate of less than 50% with the Ethical Purchasing Code principles.
Employees		
2008-2009 Objective ■ Continue the annual program "Performance Dialogue". New personal development plan for 100% of employees. Introduce new training programs for departments in constant contact with customers. Run training courses to develop the company's executives in selected skills to bolster their role. No increase in work-related accidents, within workplace, resulting in lost time from the 2005-2008 baseline (2008-2011). Continue the blood donation program. Continue the volunteering program.	2008-2009 Result ■ Program was continued. Acquisition of a personal development plan for all employees. Introduced new training courses for departments in constant contact with customers. Ran training courses to develop company executives in selected skills to bolster their role. 4 work-related accidents, with minor injuries, resulting in lost time. 434 blood units were used by employees and their families. More than 1,000 items of clothing distributed.	► 2009-2010 Objective Extend workshops, cross-departmental projects, and the "Make a difference" program. Continue the annual program "Performance Dialogue". Continue to bolster and support Vodafone Greece corporate culture by emphasising team work, communication and commitment to achieving business objectives. ■ ■ No increase in work-related accidents, within workplace, resulting in lost time from the 2005-2008 baseline (2008-2011). Continue the blood donation program. Continue the volunteering program.

Social Investment

2008-2009 Objective

Accommodate 325 children (Respite Home).

Organise 110 workshops with activities sessions and satellite activities ("On the Road Safely").

Creation of new material for high school pupils regarding helmet use ("On the Road Safely").

Examine 9,000 children ("LETO").

Contact between the unit and 5,300 children ("e-Kivotos").

Support the 2009 Special Olympics events.

Run the same number of workshops (SOS Children's Villages).

Present the works produced by children in Athens and Thessaloniki (SOS Children's Villages).

Continue to broadcast radio shows ("Radio ELEPAP").

Visits to 10 schools and institutions (Corporate Responsibility Ambassadors).

28,000 visitors to watch the film (Educational film about the environment, entitled "Earth is our Home").

Participation of 5,000 children in the program (Environmental Education and Awareness-Raising program).

Association "Archelon" Care Center facilities improvement.



Continue the program "Prospero".

2008-2009 Result

237 children accommodated.

59 workshops with activities sessions were organised.

Creation of relevant DVD for pilot application

5,306 children examined.

Unit came into contact with 3,725 children.

Support for all Special Olympics athletic activities.

Run the same number of workshops until the end of school year

Present the works produced by children in Athens and Thessaloniki in June 2008.

Radio shows continued to be broadcast.

Visits to 9 schools and institutions.

23,542 visitors watched the film

4,132 children participated.

20 new tanks installed.



Program was continued throughout the year.

► 2009-2010 Objective

Accommodate 260 children.

Evaluation of program's continuation.



Examine 4,700 children.



Evaluate program's continuation



24,000 visitors to watch the film.



Continue the program (Research program to monitor the brown bear).

Continue the program "Prospero".

Society - Economy	2008-2009	2007-2008	2006-2007
Turnover (€ million)	1,505.61	1,670.79	1,772.32
Earnings before interest, taxes, depreciation and amortisation (EBITDA) (€ million)	484.5	568.6	606.6
Earnings before taxes (€ million)	237.7	334.6	380.7
Net Sales (€ million)	708.2	810.7	891.7
Total investments in assets (€ million) ²	2,529.64	2,446.50	2,311.93
Cost of goods sold (€ million)	797.4	858.6	880.6
Social - Income distribution	2008-2009	2007-2008	2006-2007
Income tax (€ million)	65.82	98.9	146.8
Value Added Tax (€ million)	146.9	158.1	177.8
Fee of subscribers billing mobile telecommunications (€ million)	86.7	86.3	53.0
Salaried staff social security contributions (€ million)	21.5	22.0	19.6
Total cost of pay rolling and benefits (€ million)	112.6	109.5	102.2
Social Investment	2008-2009	2007-2008	2006-2007
Financial aid for social investment programs (€) ³	410,230	596,180	994,092
Value of products provided to charities (€)	0	1,363	1,347
Customers	2008-2009	2007-2008	2006-2007
Total Vodafone Greece customer base ⁴	5,906,299	5,460,305	5,057,266
Complaints through EETT	550	226	54
Complaints through the Ministry of Development etc.	423	360	111

1. For more information on Board's approach regarding financial issues, analytical information for the company's scale, information for the shares, as well as the complete financial data, please visit www.vodafone.com.

2. The assets investments are calculated based on the international accounting standards.

3. Due to a delay in the final approval of social investment program cost for the financial year 2007-2008, the cost and implementation of the respective program was transferred to the next financial year.

4. Due to Vodafone Greece operating segment, it is not possible to include customer type and geographical distribution. For example, a postpay customer that has requested Vodafone Greece services in the Attica area, does not necessarily means that he/she uses these services in the Attica area and/or that he/she stays in this specific area.

Competition	2008-2009	2007-2008	2006-2007
Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes	3	0	1
Environment	2008-2009	2007-2008	2006-2007
Use of renewable energy sources (kWh)	593,627	737,598	819,341
Total network and offices energy consumption (kWh)	89,908,000	84,879,000	81,919,000
Total network and offices energy consumption (Gigajoule)	323,667	306,677	294,908
Total CO ₂ emissions from the company's network and offices (tn)	95,118	91,032	90,177
Total CO ₂ emissions prevention due to the company's programs (tn)	25,911	21,709	16,984
Installed quantity of R-22 refrigerant (kgr)	9,931	10,795	10,980
Replenished quantity of R-22 refrigerant (kgr)	636	821	875
Ozone Depletion Potential (ODP) indicator for refrigerants/kgr (x 10 ⁻⁵)	3,489	3,643	3,733
No. of handsets, accessories, batteries collected as part of the recycling program	22,600	19,843	16,294
Approximately flight distance covered by employees (miles)	1,351,087	2,246,666	2,238,945
Environmental fines (€)	97,000	0	0
Employees	2008-2009	2007-2008	2006-2007
Total number of employees	2,641	2,779	2,689
No. of women in first line managerial level	2	2	2
Total number of accidents	13 uncontrolled - 4 controlled work-related accidents	22 uncontrolled - 1 controlled work-related accidents	11 uncontrolled - 2 controlled work-related accidents

A

AccountAbility Standards

www.accountability.org.uk

ALBA (Athens Laboratory Business School)

www.alba.gr

"ARCHELON" The Sea Turtle Protection Society of Greece

www.archelon.gr

ARCTUROS

www.arcturos.gr

Aristotle University of Thessaloniki

www.auth.gr

Athens Chamber of Commerce and Industry

www.ebea.gr

Athens Medical Center

www.iatriko.gr

B

Blind.gr

www.blind.gr

Body for the collection of home batteries (AFIS)

www.afis.gr

Business in the Community

www.bitc.org.uk

C

Center for Education and Rehabilitation of the Blind (C.E.R.B.)

www.keat.gr

Cerebral Palsy Greece

www.cp-ath.gr

Civil Protection Authority

www.civilprotection.gr

Connective Communications

www.connective.gr

Corporate Social Responsibility Europe

www.csreurope.org

D

Democritus University of Thrace

www.duth.gr/en

Dow Jones Sustainability Index

www.sustainability-index.com

E

e-KIVOTOS

www.e-kivotos.gr

Ecocity

www.ecocity.gr

Eco-Management and Audit Scheme (EMAS)

www.quality.co.uk/emas.htm

"ENIGMA" Information Program for EMF

www.enigma-program.gr

EuroCharity

www.eurocharity.gr

European Commission

<http://ec.europa.eu>

European Foundation for Quality Management (EFQM)

www.efqm.org

F

Federation of Industries of Northern Greece (FING)

www.sbbe.gr

Fire Brigade

www.fireservice.gr

Foundation of the Hellenic World

www.ime.gr

FTSE4GOOD

www.ftse.com

G

Global e-Sustainability Initiative

www.gesi.org

Global Reporting Initiative (GRI)

www.globalreporting.org

Greek Association of Environmental Protection Companies (PASEPPE)

www.paseppe.gr

GreenLight

www.eu-greenlight.org

Greenpeace

www.greenpeace.gr & www.stopclimatechange.gr

GSM Association

www.gsmworld.com

H

Hay Group

www.haygroup.com

Hellenic Advertisers Association

www.sde.gr

Hellenic Authority for the Information and Communication Security and Privacy (ADAE)

www.adae.gr

Hellenic Business Ethics Institute (European Business Ethics Network - EBEN GR)

www.eben.gr

Hellenic Cancer Society

www.hcs.org.gr

Hellenic Federation of Enterprises

www.sev.org.gr

Hellenic Management Association

www.eede.gr

Hellenic Ministry of Transport and Communications

www.yme.gr

Hellenic National Transplant Organisation

www.eom.gr

Hellenic Network for Corporate Social Responsibility

www.csrhellas.gr

Hellenic Organisation for Standardisation (ELOT)

www.elot.gr

Hellenic Ornithological Society

www.ornithologiki.gr

Hellenic Police

www.astynomia.gr

Hellenic Red Cross

www.redcross.gr

Hellenic Society for Social Paediatrics and Health Promotion

www.socped.gr

Hellenic Society of Disabled Children

www.elepap.gr

"HERMES" Program for the systematic measurement of EMF

www.hermes-program.gr

I

Institute of Social Innovation

www.isi.org.gr

Inter Municipality Health & Welfare Network OTA

www.ddy.gr

International Business Leaders Forum (IBLF)

www.iblf.org

International Commission on Non-Ionising Radiation Protection (ICNIRP)

www.icnirp.de

International Organisation for Standardisation

www.iso.org

K

KPMG

www.kpmg.gr

L

Lloyd's Register Quality Assurance (LRQA)

www.greece.lrqa.com

M

Medecins du Monde

www.mdmgreece.gr

Ministry of Development

www.ypan.gr

Ministry of Education and Religious Affairs

www.ypepth.gr

Ministry of the Environment, Physical Planning and Public Works

www.minenv.gr

Municipality of Agion Anargyron

www.dimos.tv/agionanargyron

Municipality of Iliou

www.ilion.gr

Municipality of Kamatero

www.dimos.tv/kamaterou

Municipality of Naxos

www.naxos.gr

Municipality of Paros

www.paros.gr

Municipality of Perama

www.perama.gr

Municipality of Sofades

www.sofades

Municipality of Trikala

www.trikalacity.gr

N

National and Kapodistrian University of Athens

www.uoa.gr

National Center for Urgent Social Aid

www.ekakv.gr

National Center of Instant Help

www.ekab.gr

National Technical University of Athens

www.ntua.gr

National Telecommunications and Post Commission

www.eett.gr

O

Organisation Against Drugs (OKANA)

www.okana.gr

P

P.A.O.K. F.C.

www.paokfc.gr

Panhellenic Association of the Blind

www.pst.gr

Public Power Corporation

www.dei.gr

Q

Quality Net Foundation

www.qualitynet.gr

S

Science Center and Technology Museum (NOESIS)

www.tmth.edu.gr

Scouts of Greece

www.sep.org.gr

SOS Children's Villages

www.sos-villages.gr

Special Olympics Hellas

www.specialolympicshellas.gr

Sustainable Development Ltd

www.sdev.gr

T

T.G.I. Friday's

www.fridays.gr

The Smile of the Child

www.hamogelo.gr

Therapy Center for Dependent Individuals

www.kethea.gr

U

University of Patras

www.upatras.gr/index/index/lang/en

University of Piraeus

www.unipi.gr/eng_site

V

Vidavo

www.vidavo.gr

W

World Business Council for Sustainable Development

www.wbcsd.ch

World Health Organisation

www.who.int/en/

WWF

www.wwf.gr

A

ACCI

Athens Chamber of Commerce and Industry

ADAE

Hellenic Authority for the Information and Communication Security and Privacy

AFIS

Portable Battery Recycling Scheme

ALBA

Athens Laboratory Business School

B

BITC

Business in the Community

BS

Base Station

C

CERB

Center for Education and Rehabilitation of the Blind

CEREPRI

Center for Research and Prevention of Injury

CO₂

Carbon Dioxide

CR

Corporate Responsibility

CSR

Corporate Social Responsibility

E

EBENGR

Hellenic Business Ethics Institute

EETT

National Telecommunications and Post Commission

EFQM

European Foundation for Quality Management

EIA

Environmental impact assessment

EKAB

National Center of Instant Help

ELEPAP

Hellenic Society for Disabled Children

ELOT

Hellenic Organisation for Standardisation

EMAS

Eco-Management and Audit Scheme

EMF

Electromagnetic Field

F

FING

Federation of Industries of Northern Greece

G

GeSI

Global e-Sustainability Initiative

GRI

Global Reporting Initiative

GSM

Global System of Mobile Telecommunication (2nd generation)

GPRS

General Packet Radio Service

H

HCFC

HydroChloroFluoroCarbons

HSSPHP

Hellenic Society for Social Paediatrics and Health Promotion

I

IBLF

International Business Leaders Forum

ICNIRP

International Commission on Non-Ionising Radiation Protection

ISO

International Organization for Standardization

K

KCQ

Key Control Questionnaire

KETHEA

Therapy Center for Dependent Individuals

kgr

Kilogram

Kwh

Kilowatthour

L

LMDS

Local Multipoint Distribution Services

LRQA

Lloyd's Register Quality Assurance

lt

Litre

M

m³
Cubic Metre
m²
Square Metre
MBA
Master of Business Administration
Mb
Megabyte
MMS
Multimedia Messaging Service
MTX
Switching Center
MWRh
Idle Power Megawatt hours

N

NGO
Non-Governmental Organisation

O

O.C.R.
Optical Character Recognition
ODP
Ozone Depleting Potential
OKANA
Organisation Against Drugs

P

PASEPPE
Greek Association of Environmental Protection Companies
Pb
Lead
PV
Photovoltaic

R

RES
Renewable Energy Sources
RF
Radio Frequency

S

SAR
Specific Absorption Rate
SIM
Subscriber Identity Module
SMS
Short Message Service
STAT
Hellenic Technology for the Blind Development Association

T

Tn
Ton

V

VAT
Value Added Service

W

WSCSD
World Business Council for Sustainable Development

€



Euro
3G
3rd Generation Telecommunications Network

GRI Indicators	Section/Note		Section/Note
Strategy and analysis		Government, commitments and engagement	
1.1 CEO Statement	4-5	4.1 Governance structure	12-16, 20
1.2 Key impacts, risks and opportunities	4-7, 11-25, 90-95	4.2 Chair's role and function	14-16
		4.3 Independent / non-executive members at the board	14-16
Organisational profile		4.4 Shareholder / employee participation	24-25, 73
2.1 Name of the reporting organisation	6-7	4.5 Executive remuneration and performance	96-97
2.2 Brands, products and /or services	8-9	4.6 Conflicts of interest at the board	14-16, 20
2.3 Operational structure	11-25	4.7 Board expertise on sustainability	4-5, 14-16
2.4 Headquarter location	6-7	4.8 Mission and value statements	12-13, 66-67
2.5 Countries in operation	6-7	4.9 Board governance	14-16, 20, 22-23
2.6 Nature of ownership	6	4.10 Evaluation of the Board's performance	14-16, 22, 74-76
2.7 Markets served	8-9, 96-97	4.11 Precautionary approach / principle	17, 37-38, 47-49
2.8 Scale of the organisation	8-9, 96-97	4.12 External charters / principles	17-18, 24-25, 41, 62-63
2.9 Significant organisational changes	8-9	4.13 Association memberships	24, 77
2.10 Awards received	8-9	4.14 List of stakeholders	17-18
		4.15 Stakeholder identification	17-18
Report parameters		4.16 Approaches to stakeholder engagement	17-18, 21, 24-25, 44-45, 67, 73-76
3.1 Reporting period	6-7	4.17 Topics raised by stakeholders	17-18, 24-25, 43-49, 62-63
3.2 Previous report	7		
3.3 Reporting cycle	6-7	Economic performance indicators	
3.4 Contact point for questions	7	Disclosure on Management approach	96-97
3.5 Content definition	6-7, 17-18	EC1 Direct economic value	9, 96-97
3.6 Boundary of the report	6-7	EC2 Implications from climate change	4-5
3.7 Limitations on the report's scope	6-7	EC3 Defined benefit plan	79
3.8 Joint ventures, subsidiaries and outsourcing	6-7	EC4 Financial government assistance	Vodafone Greece has not received any significant financial assistance from the government and government is not present in Vodafone Greece shareholding structure.
3.9 Data measurement techniques	23		
3.10 Effects of information re-statement	40, 96-97	EC6 Local suppliers approach	65-67
3.11 Changes from previous reports	40, 96-97	EC7 Local recruitment	Not material based on Risk Assessment results.
3.12 Location of Standard Disclosures	102-105		
3.13 External assurance	7, 23	EC8 Infrastructure investment	89

GRI Indicators	Section/Note		Section/Note
Environmental performance indicators		Social performance indicators: Labour practices and decent work	
Disclosure on Management approach	4-5, 12-13, 27-41	Disclosure on Management approach	12-13, 69-79
EN1 Volume of materials used	Not material - Vodafone Greece does not manufacture.	LA1 Workforce breakdown	70-71, 96-97
EN2 Recycled materials	Not material - Vodafone Greece does not manufacture.	LA2 Employee turnover	70-71
EN3 Direct energy consumption by primary energy source	29-32, 96-97	LA4 Collective bargaining agreements	70-71, 73
EN4 Indirect energy consumption by primary source	29-32, 96-97	LA5 Minimum notice periods	At Vodafone Greece there is a minimum notice period of around one month for substantive operational changes which affect staff.
EN8 Water withdrawal	Not material based on Risk Assessment results. Water consumption is not one of the company's main impacts on the environment, as these derive from its operation, however, this sector as well is responsibly handled.	LA7 Occupational injuries and absenteeism	77-78, 96-97
EN11 Land assets in sensitive areas	Not material - However, Vodafone Greece does assess potential impacts on biodiversity in its network deployment.	LA8 Education on serious diseases	77-78
EN12 Biodiversity within lands owned		LA10 Training per employee	75-76
EN16 Greenhouse gas emissions	29, 96-97	LA13 Employee diversity and governance	70-72
EN17 Other indirect greenhouse gas emissions	The indirect greenhouse gas emissions derive from electrical energy use from the network for company's operations as well as from the employees air travel.	LA14 Basic salary ratio of men to women	Vodafone Greece offers the same pay for the same job irrespective of gender.
EN19 Ozone-depleting substance emissions	39-40	Social performance indicators: Human rights	
EN20 NOx and SOx emissions	30	Disclosure on Management approach	12-13, 66-67
EN21 Water discharge	Not material based on Risk Assessment results.	HR1 Human rights clauses in investment	No significant investment agreement occurred that included human rights clauses or that have undergone human rights screening.
EN22 Waste by disposal method	27-41	HR2 Supplier screening on human rights	66-67
EN23 Significant spills	No relevant incident occurred.	HR4 Discrimination	72
EN26 Environmental impact mitigation	27-41	HR5 Association and collective bargaining	70-71, 73
EN27 Packaging materials	37-38, 96-97	HR6 Child labour	72
EN28 Non-compliance sanctions	96-97	HR7 Forced labour	72

GRI Indicators	Section/Note		Section/Note
Social performance indicators: Society Disclosure on Management approach S01 Impacts on communities S02 Corruption risks S03 Anti-corruption training S04 Actions against corruption S05 Public policy and lobbying S08 Regulatory non-compliance sanctions	4-5, 12-13, 43-49, 51-57, 81-89 43-49, 51-57, 81-89 12-16, 23, 66-67 12, 66-67 12, 66-67 13, http://www.vodafone.com/start/responsibility/our_approach/stakeholder_engagement/public_policy.html 12, 18-19, 96-97	Social performance indicators: Product responsibility Disclosure on Management approach PR1 Product life cycle PR3 Product information PR6 Marketing communications programs PR9 Product non-compliance	12-13, 43-49, 59-63 37-38, 43-49, 57, 63 62-63 60-61 18-19
Telecommunications Sector Specific GRI Indicators	Section/Note		Section/Note
Internal operations IO1 Investment in telecom network infrastructure IO2 Extended service to not profitable locations IO3 Health and safety of field personnel IO4 Radiofrequency emissions from handsets IO5 Radiofrequency emissions from base stations IO6 Specific Absorption Rate of handsets IO7 Sitting of masts and transmission sites IO8 Data for sites Providing access PA1 Remote and low population density areas	96-97 Vodafone Greece has no universal service obligations (Universal Service Obligation), according to legislative and regulatory framework. 47, 77-78 47 43-49 47 45, 48-49 Vodafone Greece characterises this information as confidential. Vodafone Greece's policy is to develop telecommunications infrastructure in order to provide coverage and high quality communications services throughout the entire state, including not just urban and semi-urban areas but also remote rural areas, villages and towns with low populations, roadways and almost the entire surface of Greek territorial waters.	PA2 Overcoming barriers for access and usage PA3 Availability and reliability ensurance PA4 Level of availability PA5 Usage by low and no income people PA6 Emergency situations and disaster relief PA7 Human rights issues for access and usage PA8 EMF issues communication PA9 Investement in electromagnetic field research PA10 Charges and tariffs clarification	52-55 22, http://www.vodafone.gr/portal/client/cms/view/CmsPage.action?pagelid=4341 http://www.vodafone.gr/portal/client/cms/view/CmsPage.action?pagelid=1595 Due to Vodafone Greece operating segment, it is not possible to include customer type and geographical distribution. For example, a postpay customer that has requested Vodafone Greece services in the Attica area, does not necessarily means that he/she uses these services in the Attica area and/or that he/she stays in this specific area. 60-61 89 62-63 43-49, 63 http://www.vodafone.com/start/responsibility/mpmh/our_goals_and_commitments.html 60-61

Telecommunications Sector Specific GRI Indicators	Section/Note		
Providing access			
PA11 Information on responsible, efficient and environmentally preferable use	24-25, 37-38, 41, 45, 56, 62-63		
Technology applications			
TA1 Resource efficiency of products and services	30-35		
TA2 Potential replacement of physical objects	40		
TA3 Measures of transport and /or resource changes of customer use	http://www.sepe.gr/files/pdf/Executive%20Summary.pdf		
TA4 Estimates of the rebound effect	http://www.sepe.gr/files/pdf/Executive%20Summary.pdf		
TA5 Intellectual property rights and open source technologies	http://www.vodafone.gr/portal/client/cms/viewCmsPage.action?pageld=4341		
		Notes: The afore-mentioned requirements-indicators refer to Sustainability Reporting Guidelines of GRI (2006) and to GRI Telecommunications Sector Supplement (2003).	

		2002 in accordance	C	C+	B	B+	A	A+
Mandatory	Self Declared			Report Externally Assured		Report Externally Assured		Report Externally Assured
	Third Party Checked*							
	GRI Checked							

*
KPMG Advisors A.E.



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