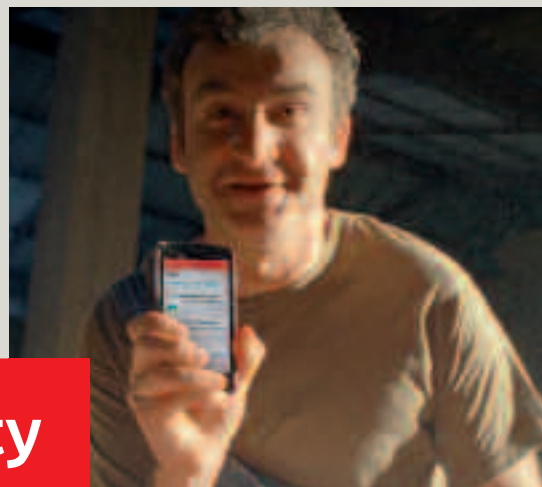




Corporate Responsibility and Sustainability Report

April 2011 - March 2012

power to you



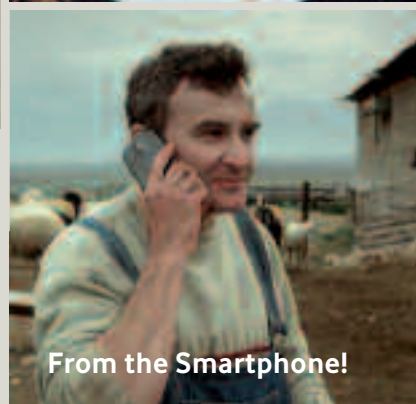
From the laptop!




From the Tablet!



Vodafone
Usage
Control



From the Smartphone!



Contents

Letter from the Chairman & CEO	1
Introductory Note	2
About Vodafone Greece and the Vodafone Group	3
Managing Corporate Responsibility and Sustainability	4
Responsible Behavior	20
Eco-Efficiency	46
Contribution to Sustainable Societies	60
Objectives - Results - New Commitments Table	70
Main Figures in Table Form	76
Website Index	78
Abbreviations	79
GRI Relevant Requirements Table	80
GRI Report Application Level	83
Application of AA1000	84
Assurance Report	85



Letter from the Chairman and CEO

Given the current difficult economic environment, Vodafone Greece's priority is to meet consumer needs, while the company remains firmly committed to providing top quality, technologically advanced, reliable services, it implements the principles of Corporate Responsibility and Sustainability across all its operations. For us at Vodafone Greece, providing cutting-edge, innovative services goes hand-in-hand with making a substantive contribution to the economic development of Greece, and also with utilising our technology to benefit society as a whole.

In December 2011, we invested €168.5 million for the renewal and expansion of the mobile telecommunications spectrum (already paid in full), thereby confirming our commitment to support the Greek economy. This investment, one of the largest made in Greece over recent years, is proof positive of Vodafone Greece commitment to constantly develop and expand its infrastructure for the benefit of the country's economy and society.

In order to utilise the potential afforded by our technology for the benefit of our customers and society, we were the first company in the Greek market to develop the 'Cost Control' and 'Usage Control' services. These specific services protect our subscribers from unwanted charges, since we keep them updated about the balance of their tariff plan, and also give them the chance to check mobile phone usage at any point in time, and consequently to have control of what they are paying.

Thanks to ongoing investments in the technology we use, we are able to support and bolster the competitiveness of Greek businesses and promote the development of the Greek economy, while also generating environmental benefits. In the year past, we developed two new 'smart' mobile communication services, SmartEcometer PV which is a telemetry and surveillance service for photovoltaic facilities, and SmartEcometer Gas which is a service allowing users to control natural gas consumption.

We continue to consistently and reliably implement programs in the fields of health and education that utilise our technology to support local communities and the people living there. Our Telemedicine program, now in its 7th year, seeks to ensure that high quality of specialised health-care services are provided to remote areas of mainland and island Greece. Our aim is to extend the Telemedicine program to 100 remote areas nationwide over the next 2 years.

Since 2005, we have been responding to the increasing need of parents to ensure that their children and adolescents use the internet safely, through the well-rounded program 'bsafeonline: learning how to use the internet safely'. Our aim is to ensure that everyone uses the internet safely through the mobile phone or computer.

Our mobile phone and accessories recycling program is now in its 10th year. Partnering with SKAI this year as part of this program, we organised recycling activities in various areas nationwide to provide more information and raise awareness among the public about the need to recycle old mobile phones and accessories.

As part of our commitment to ensure that our products and services are accessible to all our customers, for the last 8 years we have been running a series of programs such as voice navigation for our corporate website, the Vodafone Speaking Phone service for the visually impaired, the sms service for deaf customers, and support for the information and communication hub for the disabled, blind.gr.

We continue to implement the World of Difference program, offering support to individuals with vision and a passion to make their dreams a reality by working for 1 year for a charitable, not-for-profit organisation of their choice in support of a specific project.

This 10th Report presents the programs which we 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 8th 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 endeavor to constantly improve the range of information included in the Corporate Responsibility and Sustainability Report and its accuracy, we are proud to announce that the content of this year's report has once again been rated at GRI application level A+, and again is compliant with the principles of the AA1000 standard following an audit by an external, independent body.

Glafkos Persianis
Chairman of the Board of Directors & CEO

Our mission

To be the leading company in communications and to be admired for our business principles, our responsible operation, our multifaceted work and services that contribute to sustainability.



Responsible behaviour

We are committed to acting responsibly in all our activities to maintain the trust of our customers, our employees and other stakeholders.



Eco-efficiency: doing more for customers with less

We aim to reduce environmental impacts in our operations and across our value chain, from design and manufacturing of products by suppliers through to use and disposal by our customers.



Contribution to sustainable societies

We aim to deliver innovative products and services that contribute to development and enable a low carbon economy, while we systematically use mobile telecommunications technology in the sectors of health, education and environment. At the same time, we support the Greek society, via long lasting programs that place emphasis on children and cover real needs, in cooperation with solid institutions and non-governmental organisations.

The multi-faceted Vodafone Greece Corporate Responsibility and Sustainability 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 9-10). Based on the results of these processes, the areas where we focus our activities, with systematic actions and measurable results, are:

Responsible behavior

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

Eco-efficiency

6. Energy efficiency and use of renewable energy sources
7. Recycling
8. Use and promotion of environmentally friendly products and services

Contribution to Sustainable Societies

9. Developing and marketing services that bolster the development and competitiveness of the Greek economy while also leading to a carbon low economy

10. Utilizing mobile communications technology in the health, environmental protection and education sectors
11. Vodafone World of Difference
12. Programs for the Children
13. Employees Volunteerism

This is the 10th Vodafone Greece Corporate Responsibility and Sustainability Report which presents the management practices and the results of our actions for the financial year from 1 April 2011 to 31 March 2012 (2010-2012 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) and does not include associates or hellas online.

Note

- ▮ The term Vodafone Greece refers to the Greek company, while 'Vodafone Group' refers to Vodafone Group Plc which indirectly holds 99.871% of Vodafone Greece's share capital.
- ▮ The 2011-2012 objectives cited in this report were laid down in the Corporate Responsibility Report for the 2010-2011 financial year, which is available on the website vodafone.gr.

Sources of information

All information included in this publication is also available on the company's website. For more information you can visit the website vodafone.gr.

- ▮ The current Corporate Responsibility and Sustainability Report that refers to the financial year 1 April 2011-31 March 2012, as well as all previous Reports are available at vodafone.gr.
- ▮ Vodafone Group Sustainability Report is available at vodafone.com/Sustainability.

* The operation of franchise shops is not taken into account in the data included in the Eco-Efficiency section of this report, with the exception of data for the Mobile Phones, Accessories and Household Batteries Recycling Program.

Comments

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

Please send your views to

Vodafone Greece

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Vodafone Greece Corporate Responsibility and Sustainability Report Data Audit

The assurance of Vodafone Greece selected performance data related to corporate responsibility, inclusive of the self declaration of the GRI Application Level and the adherence to the principles of AA1000 standard, were assigned to KPMG Advisors AE, a Greek Societe Anonyme and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ('KPMG International'), a Swiss entity. Information regarding KPMG's work as well as the relevant Content Assurance Report can be found at the end of the Corporate Responsibility and Sustainability Report.

05/2011 Vodafone Greece exclusively presents the Vodafone 858 Smart: A new Smartphone accessible to all

05/2011 The first business apps jointly developed by Vodafone Greece and SingularLogic were launched

06/2011 Vodafone Greece offers SMEs integrated cloud and IT communication solutions with Microsoft Office 365

06/2011 Vodafone Greece received the Ecopolis 2011 award for the Annual Environmental Policy Program for its program entitled 'Hybrid operation of base stations via batteries'

07/2011 Vodafone Greece's new cost control service automatically sends SMS to pre- and post-pay customers when they reach 80% of the tariff plan's allotted air time

07/2011 Vodafone received an award for the Best Report Overall at the Bravo 2011 Awards: Open Dialogue for Sustainable Development

07/2011 Vodafone Greece won the award for the best Customer Service Center of the Year as part of the National Customer Service Awards for the second year in a row

07/2011 The Vodafone Group announced the world's first mobile phone developed in collaboration with Facebook, the Vodafone 555 Blue

09/2011 Vodafone Greece ensures it is there for its customers offering affordable Smartphones at just €89

09/2011 Vodafone Greece received a business ethics excellence award (namely the Gold "Specified model criteria" Business Ethics Excellence Certified Award) for the high score it achieved in implementing the Business Ethics Model

09/2011 Vodafone Greece developed the webpage vodafone.gr/bsafeonline, a detailed, easy to use webpage offering direct, clear-cut, comprehensive information about the internet's unlimited potential and how to safely use it

10/2011 The innovative social investment program 'Vodafone World of Difference' takes place in Greece for a second consecutive year

10/2011 Vodafone Business Connect, the new innovative fixed telephony and internet access service for freelance professionals and SMEs, was launched by Vodafone Greece

10/2011 Vodafone Greece received the Corporate Social Responsibility Award from the Athens Chamber of Commerce and Industry (ACCI) for the Corporate Responsibility & Sustainability program it implements

11/2011 Vodafone Greece continued to provide reliable and rapid communication by updating and improving the frequency bands it operates, investing €168,502,000 in this

11/2011 Vodafone Greece was the first company on the Greek market to provide an integrated uniform IP Multimedia Subsystem (IMS) network offering telephony and multimedia services together

12/2011 Vodafone Greece offered new Smartphones running the Windows O/S, and was the first to launch the Nokia Lumia 800

01/2012 "Click...in History" was a new innovative educational program run by the Foundation for the Hellenic World in collaboration with and with the support of Vodafone Greece

02/2012 Vodafone was the global leader in Machine to Machine wireless communication


02/2012 Vodafone and Sony Computer Entertainment Europe announced an exclusive partnership for a 3G connection for the new PlayStation Vita

03/2012 Vodafone with the new service Vodafone Usage control allowing company's subscribers to clearly check their tariff plan usage via bar charts showing the remaining usage allowance

06/2012 Mr. Nikos Sofokleous resigned as Chairman of Vodafone Greece's Board of Directors. Mr. Glafkos Persianis took up the post of Chairman of the Board of Directors

Vodafone Group - Vodafone Greece: Key financials and statistics

Vodafone Group	2011-2012 (€ m)	2010-2011 (€ m)
Revenue	46,417	45,884
Adjusted Operating Profit	11,532	11,818
Free cash flow	6,105	7,049
Closing proportionate customers (m)	404.7	347.7
Vodafone Greece	2011-2012 (€ m)	2010-2011 (€ m)
Turnover	1,013.03	1,087.81
Earnings before interest, taxes, depreciation and amortisation (EBITDA)	188.15	231.9
Earning before taxes	117.74	-28.7
Net sales	402.24	430.91
Cost of goods sold	610.80	656.9
Total investment in assets	2,915.32	2,687.76



Managing Corporate Responsibility and Sustainability ©

As businesses face increasingly more reserved stakeholders as a result of the economic crisis and the consequent lack of trust in large enterprises, the need for transparency has become all the more vital. Vodafone Greece has worked hard to rise to this challenge and to put in place suitable management systems certified by recognized bodies. We recognize that maintaining and building trust, which is of vital importance, requires unwavering dedication and constant alertness. To that end, our systems continue to develop as we come face to face with new issues. We cannot avoid all ethical business issues we might have to face, but our Business Principles are designed so as to ensure that our stakeholders know that Vodafone Greece always endeavors to make responsible choices.

Responsibility is part of our Business Principles, Strategy and Governance

Our Code of Conduct

As a responsible company we must ensure that we enjoy the trust and respect of all our stakeholders. Vodafone's Business Principles define our ethical standards so as to ensure the company goals are pursued within a framework of agreed principles and values, which will determine the everyday conduct and practice of its employees. Our corporate values will explicitly define all employees responsibilities which are –directly or indirectly– affected by business activities.

The Code of Conduct seeks to provide specific guidelines on our day-to-day conduct and to help attain company targets and priorities. 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, honorably and with integrity in their dealings with all stakeholders. 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 in 2008 a copy of the Code of Conduct and in 2010 an updated copy. In addition, the management team signs annually a statement accepting it and undertaking to implement it.

All employees are obliged to report any incident or possible situation by utilizing 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. No case of corruption was drawn to the Committee's attention via the available communication channels this year.

2011-2012 objective

Completion of the whistle blowing mechanism for cases of corruption.

2011-2012 result

The mechanism was notified to the Hellenic Data Protection Authority in October 2010 and we are awaiting approval.

Degree of success

-

► 2012-2013 objective

Harmonisation of the whistle blowing mechanism with the proposed mechanism by the Vodafone Group for handling cases of corruption.

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 organizations.
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, the Vodafone Group's Corporate Governance and Policies Manual (available at 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 business risk
- stresses the importance of vision and values
- provides information about the structure of the Group's various teams, their competences, and sectors where guidance is required.

Our Corporate Governance

Corporate Governance is a set of principles used to promote responsible management, running, organization 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. Within this framework, we have the committees:

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 (who are first line executives) 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 raising of loans, the approval of the years financial statements), guarantees in favor 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 Chairman, 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 organized 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.

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 on the websites vodafone.gr and vodafone.com.

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 organizational 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 8 members; the CEO, the COO, the CFO, the Human Resources Director, the Chief Information Officer, the Consumer Commercial Director, the Enterprise Business Unit Director and the Customer Operations Director. It meets twice 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 13 members namely all the 8 members of the Executive Committee and the Head of Legal and Company Secretary, the Corporate Affairs Senior Manager, and the Regulatory and Interconnection Senior Manager, the Chief Information Officer and Technology Director and the Products & Services Senior Manager. It meets once a month and there are a total of 12 meetings a year, but extraordinary meetings can also be scheduled if that is considered necessary.

Internal Audit Committee

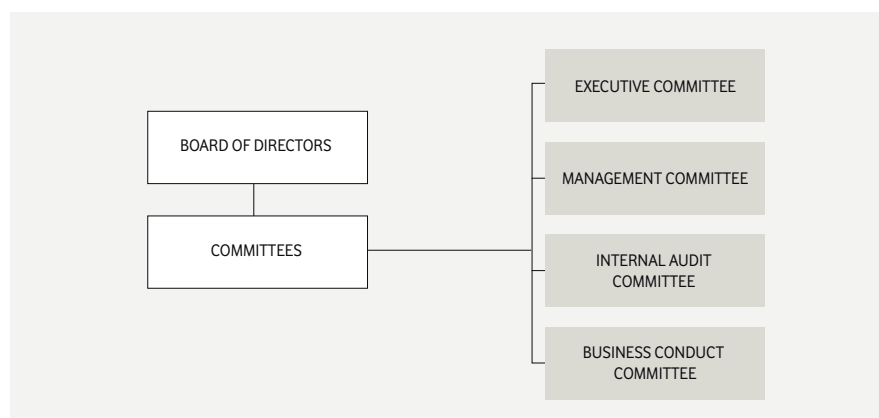
The Chairman of the Internal Audit Committee is the only official member of the Committee. He is not a company employee, but must come from the same regional unit of the Vodafone Group that the company belongs to, and must have a financial background. The Chairman of the Internal Audit Committee from time to time is proposed by the Vodafone Regional CFO and the Vodafone Group Audit Director and is appointed by the Company's Board of Directors. Two member of the Company's Board of Directors are invited to attend all Committee meetings as representatives of the Board and its Management Committee.

The Internal Audit Committee meets as often as necessary to deal with issues within its remit. The minimum number of meetings is 2 a year.

The Internal Audit Committee's main mission is to assist the Board of Directors in complying with its audit-related obligations for audits of:

1. company internal audit procedures and systems
2. company risk management procedures and systems
3. company compliance with its legal and regulatory obligations
4. how issues arising from internal audits are handled, by analyzed and reviewing all management activities intended to address gaps identified by using the following internal audit mechanisms: Key Controls Questionnaires, Entity Level Control Assessments, Policy Control Questionnaires, SOX, Risk Matrices.

At least once a year the Chairman of the Internal Audit Committee submits a report to the company's Board of Directors about the current internal audit system, the risk management system, the degree of compliance with company policies, and the degree of success in settling issues raised by internal audits.



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 Labor 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 Labor Regulation.

- ✎ Reviewing poor management of corporate affairs.
- ✎ Hearing the employees involved or other witnesses in line with Articles 24 or 25 of its Labor 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 Vodafone Greece performs a Risk Assessment to identify the risks and opportunities arising from company operations, as well as its products and services. The following aspects of Corporate Responsibility and Sustainability are examined:

Responsible operation

1. Responsible Network Deployment
2. Electromagnetic fields (EMF)
3. Content Services - Spamming
4. Confidentiality of Communications
5. Responsible Mobile Phone or Internet Usage
6. Responsible Marketing
7. Products and Services accessible to all
8. Suppliers - Associates
9. Corporate Governance - Legislative Compliance
10. Labor issues
11. Health and Safety

Eco-efficiency

12. Energy - CO₂ emissions
13. Waste
14. Cooling - Fire suppression systems
15. Products and services
16. Water - noise pollution
17. Emergencies

Contribution to sustainable societies

18. Utilising products and services with a positive economic, environmental and social footprint

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, relevant to Vodafone Greece
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 5)
4. Risk quantification
5. Prioritization and target-setting for programs the company is obliged to implement to minimize risks.

Identifying our Stakeholders' expectations

In order to recognize the needs and expectations of our Stakeholders both in-house and in the environment in which we operate, we implement specific methods to foster dialogue and to create a suitable atmosphere in which opinions can be expressed and exchanged. The Stakeholders the company has identified in relation to Corporate Responsibility and Sustainability issues are as follows:

1. Non-Governmental Organizations (NGOs)
2. Government - Local Authorities - Institutions
3. Suppliers
4. Vodafone Shops (Franchises) and other Retail Partners
5. Journalists
6. Academia
7. Business Community - Business Customers
8. Local Communities (see page 24)
9. Base Station installation sites owners (see page 25)
10. Parents - Teachers

Stakeholders

To better understand the needs and expectations of the society in which we operate, every two years we aim to carry out a survey using an independent research firm. That survey is three-pronged. The first stage is a quantitative phone survey which is followed by in-depth interviews which are held in parallel with focus groups.

The following Stakeholders participate in the aforementioned survey:

1. Non-Governmental Organizations (NGOs)
2. Government - Local Authorities - Institutions
3. Suppliers
4. Vodafone Shops (Franchises) and other Retail Partners
5. Journalists
6. Academia
7. Business Community - Business Customers

In 2009-2010 we conducted our third Stakeholder Engagement Survey. Some of its main results are available in the 2010-2011 Report.

General Public

Moreover, at Vodafone Greece we conduct a systematic nationwide survey of a representative sample of the general public investigating consumer perceptions of company's brand image. This survey reflects the degree to which the general public considers Vodafone Greece is a company that operates responsibly towards society as a whole compared to other mobile telecommunications companies.

In addition, in 2011 Vodafone Greece was one of the first companies in the Vodafone Group to participate in the GlobalScan Reputation Research which was carried out.

We also evaluate the positive perception of our actions in the Corporate Responsibility field based on annual surveys conducted by independent firms in Greece. According to the annual Awareness and Social Behavior Index (ASBI) prepared by MEDA Communication and VPRC, Vodafone Greece was in 5th place in the Corporate Responsibility index which is comprised of companies which are examined in terms of the recognizability, popularity and penetration of their Corporate Responsibility activities.

Employees

In July 2009 we conducted the first in-house survey to measure employee knowledge and perception of, involvement in and importance for them of the Corporate Responsibility and Sustainability programs we run. Employees were asked to evaluate these programs, to declare how often they took part in them and to state their intention to participate in new programs. In 2010-2011, the survey was carried out a second time and based on its results (available in the 2010-2011 Report) we planned and implemented:

- ▢ information – awareness raising actions for employees about the company's environmental programs (see page 56).
- ▢ a volunteer program involving company employees (see page 69) in the Social Investment section).

2011-2012 objective

1. Carry out the 4th Stakeholders Survey
2. Develop an action plan based on survey results.
3. Carry out an Employee Survey

2011-2012 result

1. The survey was rescheduled for 2012-2013 due to the difficulties being faced at present.
2. An internal communication plan was prepared.
3. The survey was rescheduled for 2012-2013 due to the difficulties being faced at present.

Degree of success

1. -
2. 50%
3. -

► 2012-2013 objective

1. Carry out the 4th Stakeholders Survey
2. Carry out an Employee Survey.

Vodafone Greece certifications



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 and Sustainability issues.

ISO 14001

The Environmental Management System we implement for all our activities and facilities has been certified according to the requirements of the ISO 14001 standard since June 1999 (Certificate No. 04.33.01/006 ELOT). In July 2011, the re-certification audit of our Environmental Management System was successfully evaluated by the certification body Lloyd's Register Quality Assurance (Certificate No. 362212D).

EMAS

In November 2003 we were the first telecommunications company in Greece and the second one worldwide to be certified under the European Eco-Management and Audit Scheme (EMAS). Implementation of EMAS was a definitive turning point for the company and significantly contributed to the re-structure and development of the company's Corporate Responsibility and Sustainability program. The philosophy under EMAS was utilized internally in the company, aiming to build a corporate culture that promotes Responsibility and Accountability in all sectors of our operation by making a public commitment to constantly improve the

company's operational performance by setting quantitative targets with measurable results. Considering that implementation of EMAS has achieved its objectives and the company's needs are fully served by implementation of the ISO14001 Environmental Management System, as well as by the assurance of the content of the Corporate Responsibility & Sustainability Report (according to the AA 1000 standard and the Global Reporting Initiative guidelines), Vodafone Greece will not renew its registration in the Greek EMAS Registry list.

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 October 2011 the company successfully obtained re-certification of its Occupational Health and Safety Management System from the certification body Lloyd's Register Quality Assurance (Certificate No. PIR0362212/C).

ISO 9001:2008

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 September 2011 the annual audit to maintain the two Quality Management System certificates in force for the company and Vodafone shops was successfully completed. Certification was carried out by the certification body Lloyd's Register Quality Assurance (Certificates Nos.362212/A and 362212/B).

Vodafone Greece certifications



ELOT EN ISO/IEC 17025

Vodafone Greece has once again consolidated its leading innovative position in the wider telecommunications and wireless communications sector since its "Laboratory of Radiofrequency Electromagnetic Radiation and Noise Measurements in the Environment" has extended the scope of its initial accreditation under the terms of the "ELOT EN ISO/IEC 17025:2005" Standard. The Lab extended the accreditation from Hellenic Accreditation System S.A. (E.S.Y.D.) on 21/3/2012 to cover a wider range of Radio Frequencies (75MHz – 6 GHz) and the Noise measurements. This accreditation comes as an acknowledgement of the problem-free, reliable scientific work being done by the Laboratory's personnel. Vodafone Greece is the first accredited telecom company in Greece according to the requirements of the ISO/IEC 17025:2005 standard, and the only one to have received accreditation for the noise measurements. This accreditation ensures that the Lab's measurements are completely accurate and reliable while the validity of the process is ensured through annual audits performed by the National Accreditation Body.

ISO 27001:2005

Since 1999, as the first Greek mobile telecommunications company and the first in Europe and the Group Vodafone, has been certified for its Information and Data Security Management System in order to provide the maximum possible security and protection of our customers' data (BS 7799). In June 2007, our company certified with the newest standard ISO 27001:2005, which includes 133 security mechanisms and organizational measures (Certificate No.: 362212 / F). The implementation of this system provides an integrated framework through which the security risks are identified, tested and evaluated systematically as well as proposed the security mechanisms to ensure the necessary protection level on our subscribers or employees data. In September 2011, successfully completed the annually audit by the certification body Lloyd's Register Quality Assurance.

Also, in collaboration with the Vodafone Group has analysed, proposed and agreed a detailed action time plan in order to Vodafone Greece has in place a comprehensive Privacy Risk Management System. The implementation of necessary measures and mechanisms will be aimed at strengthening the confidence of subscribers, and compliance with the relevant regulatory framework ensuring that the data will be used by authorised users without reducing the degree of their privacy.

BS 25999-2:2007

Vodafone Greece's Business Continuity Management System, which applies to the planning, development, implementation, operation, maintenance and surveillance of mobile telecommunications networks to provide 2G and 3G voice services, Short Message service, Mobile Broadband services and Customer Service operations, is certified for BS 25999 by the certification body Lloyd's Register Quality Assurance (Certificate No. 362212/H). Vodafone Greece is the first telecommunications company in the country to receive certification under that standard and one of the first within Vodafone Group. This certificate demonstrates the existence of an effective Business Continuity Management System which seeks to ensure the uninterrupted provision of critical Vodafone activities and services in the case of unforeseeable events. In May 2011, the annual surveillance was successfully completed and the scope of the Business Continuity Management System was extended to fixed telephony and internet business customer services by the certification body Lloyd's Register Quality Assurance.



Pop-up messages for employees awareness

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 appealed against that to the Council of State, which handed down judgment No. 3319/2010 which accepted the application and overturned the entire fine. Likewise, the National Telecommunications and Post Commission (EETT) imposed a €19.1 million fine on the company. The company lodged an appeal against that Decision before the Athens Administrative Court of Appeal. Judgment No. 1237/2011 rejected that appeal. The Company has now filed a petition for cassation before the Council of State against that judgment but the date for hearing for that case has not yet been set.

2011-2012 objective

1. Successful evaluation of the management systems implemented by independent validation agencies.
2. Internal review of the need to retain Vodafone's registration in the EMAS Greece Register.

2011-2012 result

1. Management systems successfully evaluated.
2. We will not renew Vodafone Greece's registration in the EMAS Greece Registry. The environmental information contained in the Corporate Responsibility and Sustainability Report is now done via the Report's content assurance procedure.

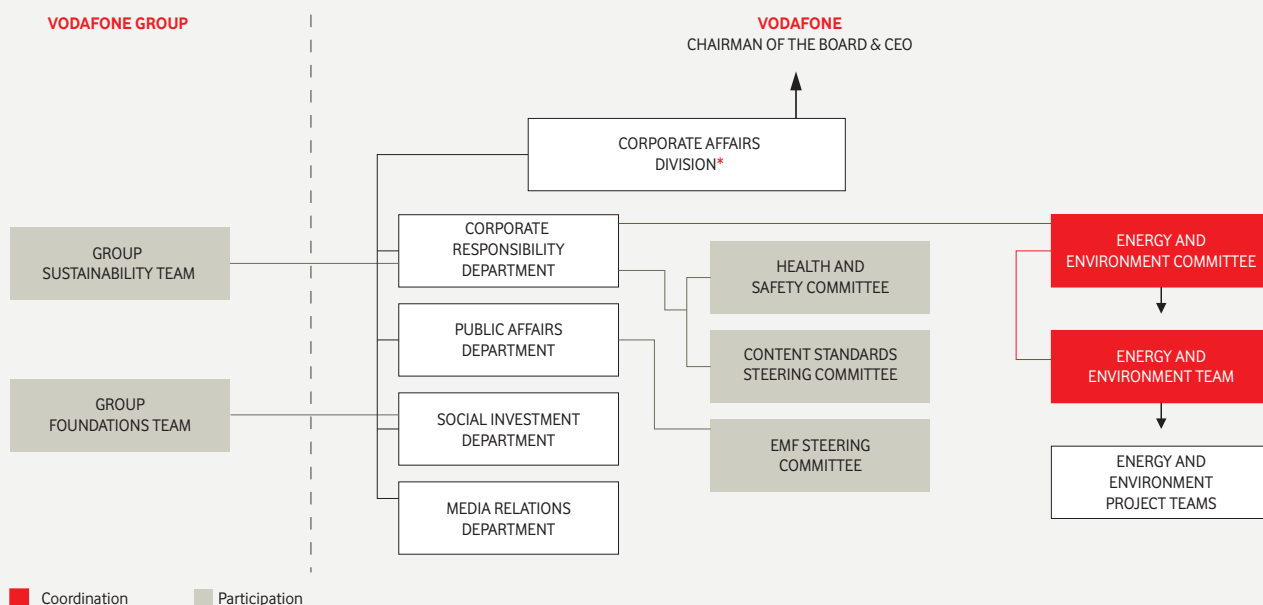
Degree of success

1. 100%
2. 100%

► 2012-2013 objective

Successful evaluation of the management systems by independent validation agencies.

Vodafone Greece organisational structure for issues concerning Corporate Responsibility and Sustainability



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

Integrating responsibility into our organisational structure

- ▢ Vodafone Group and Vodafone Greece have both set up Corporate Responsibility and Sustainability departments.
- ▢ The Vodafone Greece Corporate Responsibility Department participates in Vodafone Group Sustainability Team.
- ▢ To ensure better coordination of Corporate Responsibility and Sustainability 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.

Evaluating our Corporate Responsibility and Sustainability 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 and Sustainability practices have been implemented in two specific categories.

Quantitative Evaluation

We collect the results of the programs we implement and organize that data into specific categories in line with our strategy in this field. We aim to ensure better management of that data and allow comparisons of performance on a year-on-year basis.

The results are collected twice a year basis and the results are included in this Report. There are over 300 indicators. Each year the indicators are revised to cover the material Corporate Responsibility and Sustainability 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
- 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.

2011-2012 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.

2011-2012 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 and external company auditors, in accordance with the requirements of section 404 of the Sarbanes-Oxley Act.

Degree of success

1. 100%
2. 100%

► 2012-2013 objective

1. Check proper implementation and application of corporate processes and checks which safeguard: a) the correctness of financial results and b) company revenues.
2. Successfully obtain validation from independent auditors, who will certify the company's compliance with the requirements of Section 404 of the Sarbanes-Oxley Act.

Ensuring Business Continuity

A Business Continuity Management department has existed within Vodafone Greece since 1997 and its objective is to ensure the continuity of essential business operations and critical services/processes, safeguarding the company's brand, reputation and revenue.

During 2011, our business continuity planning activities focused on the following:

- improving the existing business continuity plans,
- testing the existing business continuity plans to ensure their effectiveness,
- continuing compliance with the BS25999 standard.
- providing training and briefings to all new employees.

We were the first company in Greece to be certified and one of the first within Vodafone Group in line with the requirements of the international BS 25999 standard for our Business Continuity Management System.

2011-2012 objective

1. Continue compliance with the BS 25999 standard.
2. Develop website to brief employees about Business Continuity issues
3. Develop an alternative workplace to be used if the main building is unavailable / inaccessible during an emergency

2011-2012 result

1. Successful audit of the Business Continuity Management System in line with the BS 25999 standard and extension of certification to fixed telephony and internet business customer services.
2. The Vodafone Security Portal was developed which includes Business Continuity Management issues, Risk Management issues and Crisis Management issues.
3. An alternative workplace has been implemented.

Degree of success

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

► 2012-2013 objective

1. Continue compliance with British Standard 25999.
2. Keep Vodafone Security Portal updated to brief employees about Business Continuity issues.

Coming into line with the bribery legislation

In July 2011 the new UK law that combats bribery, known as the UK Bribery Act 2010, came into force. All companies in the Vodafone Group that carry on activity in England and other countries should come into line with the new bribery legislation.

Vodafone Group had issued, since 2008, a policy on combating bribery and corruption, in all the countries where it operates, including Vodafone Greece (Anti-bribery Compliance policy).

This policy was reviewed in June 2011 in light of UK Bribery Act 2010. Furthermore, Vodafone Greece issued the local policy (March 2012) which is in line with Vodafone Group's policies and the relevant clauses of the legislation in force.

The main principle is one of zero tolerance of bribery practices. Vodafone's employees must NOT receive or give any form of bribes.

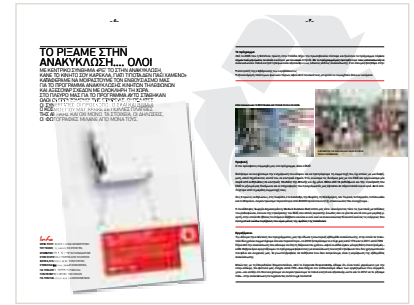
In order to ensure that it fully complies with this principle, Vodafone Greece implements the following arrangements:

- Members of the management team and employees are systematically briefed about the legal requirements in this sector (via seminars, presentations and e-learning tools), about how to deal with difficult cases of active and passive bribery, and about how to report instances of bribery.
- Company suppliers are also briefed about the new requirements and special limits have been introduced for existing contracts as a result of evaluations carried out in line with the Vodafone Group's guidelines. It is also possible to report cases of bribery by contacting a specific email address as part of the 'Speak Up' program (see page 35).
- Cases of bribery can be reported by company employees (who can provide their name or make an anonymous report) as part of the 'Speak Up' program (see page 35).
- Written assurances are provided by all company Management team members about the non-existence of bribery cases are systematically provided.
- Risk assessments are carried out to identify high risk areas and to specific actions that need to be systematically monitored.

The Code of Conduct implemented by both the Vodafone Group and Vodafone Greece contains a special section on the need to comply with this specific legislation.



Corporate magazine for employees



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 optimization measures, based on corporate governance and audit practices.

Internal Audit carries out an internal self-evaluation process using a Key Control Questionnaire (KCQ) each year to measure the effectiveness and efficiency of the internal audit system for all operations and to test compliance with Vodafone Group policies. The KCQ is used at all companies in the Vodafone Group.

The relevant questionnaire includes a series of questions on Corporate Responsibility and Sustainability aimed at improving the company's performance both at local and international level. The fact that the CEOs of local companies are the people who sign these questionnaires is proof of their importance. This process is used to set the priorities for the annual schedule of audits.

Exchanging examples of best practice

In the context of exchanging views, experiences and best practices and coordinating joint strategy on Corporate Responsibility and Sustainability issues, the Vodafone Group organizes:

- ▢ a Corporate Responsibility and Sustainability conference once a year attended by the relevant departments of companies in the Group from around the world,
- ▢ a monthly conference call among Corporate Responsibility and Sustainability officers from companies around the world.

2011-2012 objective

Exchange best practices.

2011-2012 result

Best practices exchanged.

Degree of success

100%

► 2012-2013 objective

Exchange best practices.

1. The 'Hellenic Network for CSR' logo

2. The 'Hellenic Business Ethics Institute' logo



1.



2.

Membership of international and national organizations

Both, the Vodafone Group and Vodafone Greece are members of international and national organizations operating in the Corporate Responsibility and Sustainability sector. In particular, the 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)
- CSR Europe

Likewise, Vodafone Greece is an active member of the Hellenic Network for CSR. Moreover, Vodafone Greece is a founding member of the Business Council of the Hellenic Federation of Enterprises for Sustainable Development, which participates in the regional network of the World Business Council for Sustainable Development (WBCSD). The 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 organizations', such as participation start dates, please visit the relevant websites.

Communicating our Corporate Responsibility and Sustainability

In March 2007 we commenced the first integrated print campaign covering the Corporate Responsibility and Sustainability area. At the same time, in 2006, we set up the 1256 line, a four-digit number that customers (whether post-pay or pre-pay customers) could send an SMS to, free of charge, asking for information about any topic relating to Corporate Responsibility and Sustainability. Company customers receive a reply SMS and if the question requires a more detailed response, informative materials are sent to the customer. Moreover, we designed and created an interactive game, entitled 'Mobile Invaders' aiming at informing and motivating employees and the general public about recycling, as well on responsible mobile phone use. The game has been available since 2008 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.

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

- 1-3 April 2011: 2nd Pan-Hellenic e-life interdisciplinary conference 2011 on the benefits and risks of using the internet
- 8-9 April 2011: 7th Pan-Hellenic Conference of the Local Government Authority Inter-Municipal Health & Social Solidarity Network on Municipal Health Prevention & Protection Centers in all Municipalities in the Kallikratis Scheme.
- 17 May 2011: Green ICT: a one-day event on Green ICTs
- 27 May 2011: 4th Environmental Policy & Management Conference held by the University of the Aegean
- 28 May 2011: Recycling activity run in collaboration with XANTH
- 1 June 2011: 9th Corporate Social Responsibility conference on building responsible companies – maximizing benefits and sustainability in the supply chain and economy, held by the Hellenic-American Chamber of Commerce
- 2 July 2011: One-day event on climate change and entrepreneurialism held by the Technical Chamber of Greece / Peloponnese Regional Department
- 7 July 2011: Bravo 2011 'Open Dialogue for Sustainable Development' held by the Quality Net Foundation



- 27 September 2011: 3rd Corporate Social Responsibility Conference on the disabled and their right to integration: what is the role of people-focused businesses? held by the Economist
- 17 October 2011: One-day event on 'access by the blind and the visually impaired to products, services and culture' held by the National Federation for the Blind
- 22 November 2011: CSR REPORTING FORUM 2011
- 24 November 2011: 16th ITA Workshop
- 8 February 2012: 1st conference on 'Safe Surfing concerns us all' held by the e-Crime Directorate of the Hellenic Police
- 18 February 2012: One-day event on 21st century parents, held by Doukas Schools

In the workplace environment, which we consider as important, we took the following steps to provide our employees with more substantial information about the company's initiatives in the Corporate Responsibility and Sustainability field.

The actions design aim to maintain and further improve the results of the Employee Survey conducted annually to measure knowledge, perception, participation and the importance for employees of the Corporate Responsibility and Sustainability programs we run.

- publication of 2 special features, 27 articles and 1 print insert in the corporate magazine 'joy',
- presentation of the results of our programs, prevailing global trends, and examples of best practices from other organizations on the company's Global Intranet,
- distribution of the Vodafone Corporate Responsibility & Sustainability Report for 2010-2011 in electronic format,
- use of flash banners on the company's Global Intranet and reminders in the Joy magazine featuring energy savings and office/home recycling messages,
- news about all company programs on the company's bulletin board
- energy savings-related messages on the login screen,
- pop-up messages reminding employees to set air-conditioners for the seasonal temperature,
- special messages on the thermostats at our premises reminding staff to correctly adjust the temperature depending on the season,
- special signs on the outer doors of buildings with messages about the use of air-conditioners inside the buildings,
- hosting of a mobile phone recycling week for employees,
- special labeling at the recycling corners in all company's buildings,
- sending an email to all via the company's customized electronic bulletin board.

2011-2012 objective

1. Continue the Corporate Responsibility and Sustainability print campaign with emphasis on the 'mobile phones recycling program'.
2. Implement information dissemination—awareness raising initiatives for employees about company environmental programs.

2011-2012 result

1. Continuation of the print campaign about the 'mobile phones recycling program'.
2. Information dissemination – awareness raising measures implemented.
3. A new print and online company about safely surfing the internet was launched.

Degree of success

1. 100%
2. 100%

► 2012-2013 objective

1. Continue the campaign about the 'mobile phones recycling program' and safely surfing the internet.
2. Implement information dissemination—awareness raising initiatives for employees about company environmental programs.



Responsible Behaviour

At Vodafone Greece, in parallel with achieving our commercial objectives we also take into account the impact of our operations on society as a whole and take suitable steps in that regard with measurable results. Depending on the extent of its activities - without this necessarily translating into financial outlays- the company is obliged to reduce the potential negative impact and bolster the positive impact on the world around it.

Mobile Phones - Masts - Health - Net- work Deployment

Responsibly deploying our network

The rapid growth of mobile telecommunications has familiarized us with mobile phone 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 any time, others are concerned about the way mobile telecommunications networks operate. At Vodafone Greece, we deploy our network of Base Stations in line with the guidelines issued by international scientific organizations and strictly comply with the standards adopted in relation to public exposure limits to electromagnetic fields.

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.). Based on the 2009 results of the Stakeholder Engagement Survey, one of the key issues that came up was 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
- ▢ environmental impacts
- ▢ network location planning and selection
- ▢ communication with local government representatives and local communities living close to Base Stations
- ▢ awareness and support of Base Stations installation sites owners.

Safe exposure levels for the general public in Greece as a % of the EU's safe exposure levels

Frequency range	70%			60%		
	E (V/m)	H (A/m)	P (W/m ²)	E (V/m)	H (A/m)	P (W/m ²)
900 MHz	34.5	0.0929	3.1	31.9	0.0860	2.7
1800 MHz	48.8	0.1313	6.3	45.2	0.1216	5.4
2–300 GHz	51	0.1339	7	47.2	0.1239	6

Benchmark figures in the Greek legislation in various frequency ranges calculated using a 70% and 60% reduction in the E-field strength, H-field strength, and equivalent plane wave power density (P). Mobile telecommunications networks operate at frequencies of 900, 1800 and 2100 MHz.

In Greece, the safety exposure limits (basic restrictions and reference levels) for the general public are specified in paragraphs 9 and 10 of Article 31 of Law 3431 (Government Gazette 13/A/3.2.2006) on electronic communications and other provisions, as modified by the Law 4070/2012 (Government Gazette 082/A/10.4.2012), as well as in Articles 2-4 of Joint Ministerial Decision No. 53571/3839 (Government Gazette 1105/B/6.9.2000) of the Ministers of Development, Environment, Planning & Public Works, Health & Welfare, and Transport & Communications on Protective measures for the public regarding the operation of land antennas. That Joint Ministerial Decision was based on Recommendation 1999/519/EC of the Council of the European Union on limitation of the exposure of the general public to electromagnetic fields (0 Hz – 300 GHz) (Table 1) (OJ L 199, 30.7.1999).

In addition, other safety factors have been incorporated into the safety exposure limits for the general public in Greece. More specifically, in the case of a Base Station installed within a distance of less than 300 meters from the perimeter of buildings housing kindergartens, schools, elderly homes or hospitals, the limits in Greece equal the 60% of the EU Recommendation while in all other cases equal the 70%.

Vodafone Greece's mobile telecommunications network has been designed and installed based on the 60% of the recommended safety exposure limits for the general public irrespectively of whether there exist kindergartens, schools, elderly homes or hospitals within a distance of up to 300 meters from the Base Station installation. To ensure compliance within the national legislation regarding exposure limits, the company submits a technical study on the radio emissions for every Base Station to the Greek Atomic Energy Commission (GAEC). Micro Base Stations (cells operation at very low power – total effective radiated power is less than 164 Weirp) are excluded from the aforementioned requirement. Moreover, the company has the Vodafone ISO/ 17025-certified Environmental EMF and Noise Measuring Lab carry out regular checks (measuring the level of EMF radiation) on a part of its network each year in collaboration with academic bodies such as Universities, NTUA and the GAEC.



'The apple of discord:
Technology, antennas,
mobile phones, health'

Region	Average Representative Power Density value [W/m ²]
EASTERN MACEDONIA & THRACE – EPIRUS – WESTERN MACEDONIA REGIONS	0.1165
ATTICA	0.0994
NORTH AEGEAN	0.0815
WESTERN GREECE	0.1203
THESSALY	0.0392
IONIAN ISLANDS	0.0177
CENTRAL MACEDONIA	0.1111
CRETE	0.1028
SOUTH AEGEAN	0.1057
PELOPONNESE	0.0928
MAINLAND GREECE	0.1841

EMF measurements from 13 regions of Greece (which measured power density units, W/m²) are presented in the table above. The specific measurements were performed either by the Vodafone Greece accredited lab, according to ISO 17025, or by independent authorities such as GAEC or Universities, responding to individual requests or implementing their obligations under Greek law.

In addition, mobile phones sold at 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.

2011-2012 objective

Promote the Vodafone Group network deployment policy principles to internal and external associates.

2011-2012 result

Promotion of Vodafone Group network deployment policy principles to local authority representatives and local communities (page 24) and base stations landlords (pages 24-25).

Degree of success

-

► 2012-2013 objective

1. Workshop for the promotion of Vodafone Group network deployment policy principles in order to inform the company's employees and contractors, whose responsibilities relate with the network deployment and operation of the company.
2. Promote Vodafone Code of Conduct to company's contractors, whose responsibilities relate with the network deployment and operation of the company.

Implementing the Health and Safety of RF Fields Policy

At Vodafone Greece we implement a Health and Safety for RF Fields policy that ensures protection from 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 have 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 measurements of the Specific Absorption Rate (SAR) for terminal use next to the ear in accordance with the European standard EN50360 and IEC 62209-1. The company has also innovated by requiring that manufacturers measure SAR values following the new international protocol, that was published in 2010 for handsets use next to the body. These measurements are designed to check that the SAR is in compliance with the national and international standards.

Visual impact

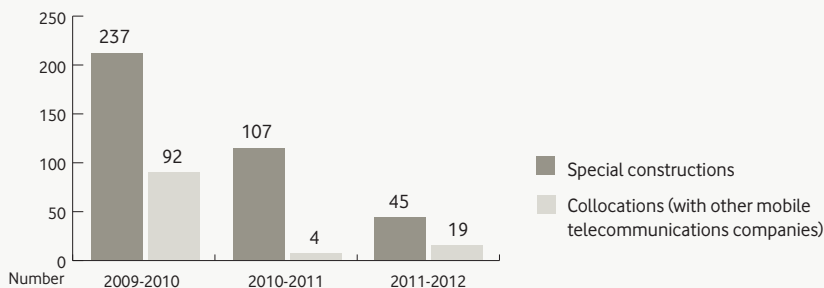
Aiming to reduce Base Stations visual impact, Vodafone Greece in 1998 began to design stylish small-scale antennas with a low visual impact in urban, semi-urban and sensitive surroundings. In particular, Vodafone Greece:

- ▮ develops alternative methods for integrating antennas into the existing built 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 2011-2012 there were 45 special constructions and 19 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.

Netpolis: Greece's first web-based game using mobile telephony technology



Annual special constructions - Collocations



Environmental impact assessment studies

Vodafone Greece conducts environmental impact assessment studies (EIS) to ensure that any possible environmental impact of Base Station construction and operation is mitigated. However, in 5 cases, a fine was imposed on the company (€25,100) due to lack of proper Base Station environmental impact assessment studies. The company ensures that all Base Stations have the appropriate studies required by the national legislation. The procedures telecoms operators have to follow for Base Stations licensing and installation, according to the national law, are complex, bureaucratic and time-consuming, hindering the development of mobile telecommunications and the uninterrupted communication among users, as well. It is worth noting that more than 15 authority service departments are involved in the licensing procedure of a base station, while the time required to obtain the necessary licenses may be as high as 3 years. Moreover, in many cases there are contradictory requirements set by the different authority departments responsible for issuing the same license, while other departments may delay or refuse to issue a license, ignoring the law in force and based on arbitrary demands.

Unfortunately, the new legislative framework has not resolved the majority of the problems, nor simplified the licensing procedures. It is indicative that the responsible government authorities have issued environmental approvals - a prerequisite for the full licensing of a Base Station - for just approximately 50% of the EIS submitted from the company.

The Law 4070/2012 (Government Gazette 082/A/10.4.2012) on electronic communications, maintain the provisions of the Law 4053/2012 (which is the modification of the Law 3431/2006), simplifying the procedure of mobile telecommunication antennas installation. The new procedure defines HTPC (Hellenic telecommunications & Post Commission) as the central point of service (one-stop shop). HTPC allows the installation of a new antenna (or the modification of an existing one) within 4 months period, if there is an approval from GAEC (Greek Atomic Energy Commission) and Civil Aviation Authority (CAA) and if no other negative opinions exist from other relevant authorities. Existing antennas installations that are in on-going licensing procedure, may operate legally under restrictions, and there is a 24 month period granted for the completion of their full licensing.

Public perception surveys on mobile telecommunications, technology and health issues

The qualitative and quantitative public perception survey (2009) to learn the public's opinion about how responsible the company is on mobile phone, technology and health issues showed that the public's main concern is its lack of understanding about technology and the need for antennas and how they operate.

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.

In addition, the results of the Special Eurobarometer survey No. 347 (June 2010) showed that the majority of Greek citizens (81%) are concerned about possible risks associated with EMF fields, while 53% said they considered mobile phones to be a potential source of serious health problems.

1. Mobile measuring station
'HERMES'2. Informative leaflet for
'HERMES' program

Informing the public

During 2011-2012, "The Apple of Discord: Technology, antennas, mobile phones, health" was updated. During the same period we distributed more than 28,200 copies of this booklet via the Vodafone Greece shops, by direct mailing or at info-meetings with Greek authorities, bodies, the mass media, to company employees as well as to the University of Patra, Technology Museum. This brochure explains (in understood language) 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 World Health Organization (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 2011-2012 we updated the vodafone.gr website section entitled "Antennas, mobile phones, technology and health" and also updated our Global Intranet accordingly. We also continued to offer training for company employees via the e-learning program entitled 'Mobile Phones, Masts and Health'. 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 from the public properly. The program is available on the Global Intranet.

In 2011-2012 we continued to provide NetPolis, Greece's first web-based game using mobile telephony technology. NetPolis was developed under the supervision of Professor Theodoros Samaras, Aristotle University of Thessaloniki, Radio Communications Laboratory. The players, via the website <http://www.netpolisgame.gr>, "build" their very own NetPolis mobile telecommunications network by complying with the technical requirements and the key rules of Greek law for network deployment. In 2011-2012 the NetPolis website received more than 32,800 hits.

Dialogue with Local Communities

We held more than 490 info-meetings with representatives of local government, national and regional media, associations and NGOs.

2011-2012 objective

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

2011-2012 result

Issues were communicated.

Degree of success

100%

► 2012-2013 objective

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

Awareness and support Base Station installation sites owners

Owners of sites where company Base Stations are installed are major players when it comes to network deployment and retention. The call center we designed and develop to handle site owners has been operating successfully since 2008 and 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.

During the time this call center has been in operation, it is clear that Vodafone Greece's choice of implementing a project like this was both necessary and well-timed. In addition to maintaining a climate based on collaboration between owners and our staff and to promoting reliability, we effectively dealt with those issues that arose in good time (and continue to do so) and with questions/requests relating to the specific service, which has enabled the company's network to remain in operation without interruption.

In 2011-2012 in particular, the call center and the relevant company department received around 16,000 calls including the number of calls made by base station owners directly to company employees. Almost all issues which arose were resolved and the average time to resolution was:

1. Construction issues: 1 month
2. Technical and procedural issues: 5 days
3. Relations between owners and local communities: Immediate

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'



The call center contributes to maintaining a climate based on collaboration between owners and our staff and ensuring they can rely on each other, and also to effectively managing issues which arise in good time so as to ensure the uninterrupted provision of company services and products.

Our aim is to constantly improve Base Station owner customer service levels by further developing the call center so that it can handle the ever-increasing number of issues involved.

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 collaborates 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 provided to the universities by Vodafone Greece to allow them to implement the program.

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 organizations, the Greek legislation, sources of further information and an interactive e-learning tool. The program started back in November 2002.

In 2011-2012 the program was extended to 6 new locations, with a total of 113 measuring stations in 13 Regions around Greece. A monitoring 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 service which measures and records EMF along main roads in urban areas. During 2011-2012, the Mobile HERMES service took measurements in 7 municipalities (for example the Municipalities of Rethymnon, Trikala, Hios, Patra, Corinth, Loutraki and Rhodes). Last but not least, in the context of information dissemination activities, the 'HERMES' program participated in 1 event that was organised by local authorities in the Municipality of Oropedi in the Prefecture of Lasithi.

In 2011 the new i-Hermes service became operational. This is yet another innovative service providing information to the public about the levels of the electromagnetic field in the environment. The service's innovative feature is that it can provide the public with immediate updates about the results of measurements on computer screens installed in communal areas. For example, one of the HERMES program's measuring devices is installed on the roof of a building (e.g. a municipal building) and presents on a computer screen, located at the public premises of the municipality, the levels of the electromagnetic field in the environment, in real time. In this way, in addition to the HERMES program's website, citizens are offered the option of being informed in real time at the location of interest. I-Hermes operates in our company buildings at Chalandri and Pallini, as well as in the YMCA building in Thessaloniki.

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 Pediatrics 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 2011-2012, 2 info-seminars were organised for members of the Medical Association, health educationalists and medical schools. More than 270 people attended the seminars. At the same time, the program was presented to 9 Medical Conferences via an info-stand and relevant brochures were distributed. More than 1,030 brochures were handed out as part of the program.

2011-2012 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 10 new locations.
2. Provide support for info-actions for the university programs 'HERMES' and 'ENIGMA'.
3. Provide support to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 5 new areas.

2011-2012 result

1. Support was provided for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the 'HERMES' program to 6 new locations.
2. Support was provided for 1 info-action for the university program 'HERMES' and 11 info-actions for the university program 'ENIGMA'.
3. Support was provided to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 7 new areas.

Degree of success

1. 60%
2. 100%
3. 140%

► 2012-2013 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 5 new locations.
2. Provide support for info-actions for the university programs 'HERMES' and 'ENIGMA'.
3. Provide support to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 6 new areas.

Customers

Implementing responsible marketing practices and communication of our operation

In 2004 the Vodafone Group prepared a manual containing responsible marketing guidelines. The aim of those guidelines was to set advertising, promotion and responsible marketing standards so that Vodafone's marketing materials were legal, proper, fair, sincere and truthful, and respected people's differences in terms of age, gender, sex, religion and physical or intellectual abilities.

For example we:

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

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

- ▮ preparation and updating of detailed tariff lists which were distributed to all sales channels,
- ▮ tariffs are displayed on the company website and updated after any changes,

- reference is made to tariffs in all advertising flyers,
- 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.

2011-2012 objective

Check marketing materials to ensure they are compatible with the Vodafone Group's responsible marketing guidelines.

2011-2012 result

Check was carried out (no non-conformities identified).

Degree of success

100%

► 2012-2013 objective

Review the responsible marketing guidelines manual.

Protecting our customers from unwanted charges

Vodafone Greece is committed to being there for consumers, to listening to their needs and to reacting to them by offering reliable high quality products and services. Our primary concern is to improve the level of service we offer and to protect subscribers. We found inspiration in the fact that technological progress can make people's lives better but that frequently technology and human needs do not go hand in hand. We therefore see it as our role to bring technological progress into line with real human needs. That's how we came up with the program "Keep on ... (make you need/goal a reality). We're here every time you need us," which is an attempt to depict real human needs and how we support them.

Cost Control

Responding to subscribers' needs to have full control over what they are paying and to quickly and easily protect them against unwanted charges, in 2011 Vodafone was the first to develop the Vodafone Cost Control service. Since June 2011 this service has allowed individual pre- and post-pay customers to automatically receive free updates when they reach 80% of their tariff plan (air-time, SMS or mobile internet usage). This scheme was extended to professionals in February 2012. In particular:

- The service is automatically activated and is free of charge for all pre- and post-pay subscribers and business customers on Flexible and Unlimited tariff plans. Subscribers receive a free SMS once they reach 80% of the airtime or mobile internet usage allocated by their tariff plan.
- By logging on to vodafone.gr/MyVmb all Vodafone Mobile Broadband subscribers (whether individual or business customers) can register to receive a free SMS when they reach 80% and 100% of their usage. If someone exceeds the allowances as part of his tariff plan he is given the option to select an extra tariff plan, thereby ensuring even better cost control.
- All individual and business post-pay subscribers can call 1284 or send an SMS to that number at any time to check their remaining airtime / SMS allowance or mobile internet usage allowance for their mobile phone. Likewise, subscribers can find out the balance on their Vodafone Mobile Broadband contract by logging onto vodafone.gr/MyVmb from their laptop or tablet.
- Pre-pay subscribers in particular can check their remaining allowances in real time by calling 1252 freephone or by sending a free SMS to 1252 containing the message 'Y'.

- The Vodafone Cost Control service is also available to all subscribers traveling abroad provided they can use their mobile internet plan on their mobile phone, laptop or tablet, offering them a free SMS when then reach 80% and 100% of their allocated usage.
- Moreover, all individual post-pay subscribers and all business subscribers to Flexible and Unlimited tariff plans automatically receive a free SMS when their airtime and SMS allowance under their tariff plan is renewed.

Usage Control

In December 2011 Vodafone Greece launched the Vodafone Usage Control service for all pre- and post-pay subscribers (whether individual or business customers) allowing them to clearly check their tariff plan usage via bar charts showing the remaining usage allowance. The service is available via mobile phones (smartphones) by downloading the My Vodafone application or on a computer or tablet via the My account section of vodafone.gr. In addition, the My Vodafone app provides subscribers with smartphones with information about their account. Pre-pay subscribers can also activate tariff plans, top up their airtime via top-up cards, increase their balance and enjoy Vodafone Sharing. In addition to offering usage controls, Vodafone My Account also provides subscribers with a comprehensive range of information about their account, itemized call lists, and allows them to pay bills online, upgrade to a new handset, renew their contract with a discount instead of receiving subsidization, and so on. Subscribers can register free of charge for My Account at vodafone.gr or at any Vodafone shop.

To inform customers about the Vodafone Cost Control and Vodafone Usage Control services and ensure that they were well understood, we took the following steps:

Vodafone Usage Control



- ▢ We developed a television and radio communication campaign, put print inserts in the press, designed internet banners and published informative press releases.
- ▢ We developed promotional material that is available via all sales channels, that clearly sets out what the service is and the advantages it offers.
- ▢ We launched the services via the company's website and listed detailed charges for the Vodafone Cost Control service for Vodafone Mobile Internet tariff plans for mobile phones, laptops and tablets.

Listening to our customers' needs

Pre-pay tariff plans

Listening to the needs of our younger subscribers who need to communicate widely, irrespective of the network involved, we updated our CU tariff plans following high demand for them, adding 100 minutes of airtime to all network, to satisfy Vodafone CU subscribers' need to communicate.

In December 2011 we also gave CU subscribers the chance to automatically win an additional bonus (either €2, €20, €200 or 2000 Sony Ericsson neo V smartphones) free of charge with every €10 top up. A Christmas bonus was also offered via the Vodafone CU website (vodafoneCU.gr) or by sending a free SMS.

Aimed at adults over 25 looking for simple, easy to use pre-pay services, Vodafone's pre-pay services offer unlimited air time and SMS to all networks with every € 10 air time top-up.

1. Air time and SMS plans for:
 - 80 minutes of air time to all mobile and fixed telephony networks for €7.
 - 150 minutes of air time to fixed telephony networks for €5
 - 60 SMS to all networks for €3.
2. The 'Vodafone bonus' scheme that offers 2 free hours of air time to all Vodafone numbers (pre- and post-pay numbers) with every €10 top-up for subscribers who need to communicate with Vodafone numbers.
3. The Friends & Family program which charges € 0.01 per minute of airtime to one or two Vodafone mobiles chosen by the subscriber. Calls are unlimited any time of the day, any day of the week. There are no activation costs.
4. The Cash Back program that returns 10% to 20% of every top-up every three months.

Vodafone International

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. Preferential airtime (per-second charging) and SMS charges:
 - ▢ to fixed numbers in Greece.
 - ▢ to all networks in 6 selected countries (Albania, Russia, the Ukraine, Bulgaria, Romania and Georgia)
 - ▢ to all Vodafone International subscribers.
 - ▢ to all Vodafone International 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.

Vodafone and Hellas on Line

We are constantly improving our strategic partnership with hellas online, offering total communication solutions that encompass mobile, fixed telephony and ADSL internet. Listening to our subscribers' needs we continue to offer bundled packages designed to reduce the communication costs for each and every family. In addition, we have developed a new fixed telephony and adsl internet plan that also offers air time to Vodafone mobiles of family members. To advertise these bundled packages we:

1. developed advertising materials available in-shop featuring detailed tables and showing the plans and the advantages of our special offers.
2. advertised the itemised charges and combined tariff plans on the company's website.
3. improved customer service points for the sales channels of both companies.

Mobile Internet

For those subscribers wanting to surf the internet without worrying about the cost entailed, even if they are away from home, Vodafone Greece offers:

1. Vodafone Mobile Broadband post-pay tariff plans ideal for internet users that need their laptop or tablet connection away from home. Vodafone has design cost-effective plans starting from €10/month to meet different needs. These plans are either volume or time-based. In addition, all Vodafone Mobile Broadband post-pay tariff plan subscribers need no longer worry about unwanted charges since from July 2011:
 - they receive an automatic SMS when then reach 80% of their data allowance
 - when they reach 100% of the plan's usage allowance, usage is frozen but they can opt to continue surfing or not. To continue surfing they can buy an additional plan valid for 30 days (500MB or 5 hours at a cost of €10 and/or a 200MB or 2 hours plan at a cost of €5).
 - Any Mobile Broadband users connected to the service can check their remaining allowance at any time via the webpage vodafone.gr/myymb, that allows them to manage their connection.

2. The Vodafone KartoInternet service for all subscribers who want to connect to the internet via a laptop or tablet without any bills or commitments, just logging on whenever they want for as long as they want. Given that many of our customers need internet connections on their summer holidays, coupled with the general economic difficulty that exists at present, in June 2011 Vodafone Greece began offering 30-days free internet access along with each Vodafone KartoInternet connection that includes a SIM card for accessing the service, usage instructions and a wireless USB modem. When purchasing a Vodafone KartoInternet connection all subscribers were given the chance to surf the internet free of charge from a laptop or tablet during their holidays. To ensure that customers are well-informed and fully understand the Vodafone KartoInternet service, we took the following steps:
 - we produced television ads, made print inserts in the press, developed internet banners and published informative press releases.
 - We developed promotional material that is available via all sales channels, that clearly sets out what the service is and the advantages it offers.
 - We advertised the special offer and its advantages on the company's website.

At Vodafone, in order to avoid network congestion and ensure the quality of our network and the services provided to our subscribers, we have designed and implemented the Fair Usage Policy for tariffs, services and offers of Vodafone related to unlimited usage (and / or any other circumstances). For more information, please visit vodafone.gr.

The mobile subscribers identification law now requires that pre-pay plan subscribers register their particulars at one of the company's shops. We therefore designed a flexible, easy procedure to allow customers to do so rapidly and easily. Moreover, we attended meetings with the National Telecommunications and Post Commission (EETT) about the progress of identifying pre-pay subscribers and made proposals about simplifying procedures to facilitate our customers.

Responding to consumer requests

We place great emphasis on the feedback we receive from the public. The written complaints concerning Vodafone Greece transferred to the company were as follows:

- 560 from the EETT
- 339 from the Ministry of Development, 9 from the Consumers Institute and 16 from Consumer Association 'Quality of Life'.

Vodafone Greece's primary concern is to provide excellent customer service and to protect its subscribers. That is why the company has laid down extremely strict terms and conditions for collaborating with providers of Multimedia Information Services. We are in fact the only company which has set a maximum monthly charge per subscriber on associated companies. In addition, we have included very strict penalty clauses for associated companies in the case of complaints from our subscribers. However, if the subscriber wants to contact any third company to cancel his/her subscription to a service, if they know the code number for that service, all they have to do is contact the Vodafone Greece Customer Service Department to obtain the phone number of that company.

1. "Parents' Guide" leaflet

2. bsafeonline workshop at Volos (speakers)



Offering mechanisms and tools to ensure safe mobile phone and internet usage

Vodafone Greece bsafeonline: learning how to use the internet safely

Vodafone Greece is keenly aware of the ever-growing need to ensure that children and teenagers can safely surf the internet. With that in mind, it developed the well-rounded bsafeonline program. This program seeks to ensure safe internet usage for all whether surfing the net from a mobile phone or computer. Vodafone Greece's bsafeonline site offers suitable mechanisms for controlling access to content aimed at adults, for mobile phones and suitable tools for providing information and raising awareness about safe internet usage.

Access Control mechanisms

• Vodafone MyWeb services menu

At Vodafone Greece, in the case of services aimed only at adults that are available via the MyWeb menu:

- ▮ We require mandatory age confirmation before allowing access to the specific services.
- ▮ We allow parents to request that their children's access to specific services to be blocked (Minors profile). Those users who do wish themselves or their children to have access to all Vodafone Greece services aimed exclusively at adults can stop those services from appearing on their mobile phone by calling the Vodafone Greece Customer Service Department and requesting activation of the 'Minors Profile' for the specific number.

Internet

If a customer has entered the MyWeb menu and wishes to enter the internet, a message appears on the mobile phone screen informing him/her that he/she is about to enter an area not controlled by Vodafone Greece. In this case, at Vodafone Greece we provide to all of our customers the ability to control access, via their mobile phone, to content which is freely available on the internet. They can just contact the Customer Care department and ask to activate a special filter that limits the access to specific internet websites via their mobile phone.

Safe internet usage information and awareness raising tools

• vodafone.gr/bsafeonline

The main info-tool in Vodafone Greece's bsafeonline program is the webpage vodafone.gr/bsafeonline, that was developed to familiarize parents and anyone dealing with children and teenagers, about popular web services, such as social networking sites (facebook, twitter), blogs, forums, apps, and about telephony and television over the internet. This webpage allows parents to learn about the challenges that they or their children may face when surfing the internet, such as spam messages, malicious communication, cyberbullying, and unlawful / misleading content, etc.

The bsafeonline webpage focuses on each age group individually, so that parents can find out information based on their own children's age, and learn about the web services that are of interest to them and the corresponding challenges that exist. bsafeonline.gr also includes hints, tips and advice from experts about the issue, such as K. Siomos, Psychiatrist, and Chairman of the Hellenic Association for the Study of Internet Addiction and E. Sfakianakis, Director of the Electronic Crime Division of the Hellenic Police, as well as representatives of international web service providers such as facebook.

• Parent's Guide

Information about safe internet usage is also available in hard copy in the updated Parent's Guide, available at Vodafone shops or on the company's website, vodafone.gr/bsafeonline. The updated Guide which replaces the first Parent's Guide that was published in Greece in 2007 has been developed in cooperation with two well-respected bodies in the field, the Hellenic Association for the Study of Internet Addiction and the Hellenic Society for Social Pediatrics and Health Promotion.

1. bsafeonline program print insert
2. Mobile phones recycling program print insert



• bsafeonline one-day events

As part of the bsafeonline program, Vodafone Greece held a series of info-events in various cities nationwide in collaboration with child psychologists from the Hellenic Association for the Study of Internet Addiction. These events were intended for parents, teachers and anyone working with children. During the events, participants were able to hear from experts about the internet's unlimited potential, the risks users can encounter when surfing the web and about internet addiction and how to deal with it. Participants also had the chance to engage in discussion with experts and have any queries they had answered. 8 info-events were held nationwide in 2010-2011 attended by more than 750 parents and teachers.

• Partnerships

Vodafone Greece supported the Safe Surfing Events organised by the Cyber Crime Unit of the Hellenic Police in cities across all of Greece aimed at teachers, parents and children. It also participated in the 1st Safe Internet Conference organised by the Ministry of Citizen Protection and the Cyber Crime Unit of the Hellenic Police, to celebrate World Safe Internet Day on 8 February 2012. At the conference, Vodafone Greece presented delegates with an overview of its well-rounded program entitled 'bsafeonline: learning how to use the internet safely'.

Operating framework

• Content Standards Steering Committee

At Vodafone Greece we have a Content Standards Steering Committee which 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.

• European Framework

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 categorize content so that content unsuitable for minors is clearly and immediately recognizable, 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.

2011-2012 objective

1. Distribute leaflets
2. Implementation of an awareness program regarding safe internet use.

2011-2012 result

1. Leaflet distributed
2. vodafone.gr/bsafeonline webpage developed.
3. bsafeonline info-events organised in 8 cities nationwide.

Degree of success

1. 100%
2. 100%

► 2012-2013 objective

1. Leaflet distribution.
2. Hold bsafeonline info-events in 12 cities nationwide.

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 dialing 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 by making information available on the company website vodafone.gr.

'Voice Navigation Service'

**2011-2012 objective**

Continue to provide information.

2011-2012 result

Continued provision of information.

Degree of success

100%

► 2012-2013 objective

Continue to provide information.

Informing and raising awareness among the public about Corporate Responsibility and Sustainability issues

We provide systematic briefing to the general public, regarding company's Corporate Responsibility and Sustainability programs, through articles, special publications and various information inserts in high circulation newspapers and magazines. The company's website is also constantly updated with any new information and/or the company's programs related to Corporate Responsibility and Sustainability.

2011-2012 objective

Inform public about Corporate Responsibility and Sustainability issues via articles.

Αποτέλεσμα 2011-2012

Public was informed.

Degree of success

100%

► 2012-2013 objective

Inform public about Corporate Responsibility and Sustainability issues via articles.

Access to Communications

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.

2011-2012 objective

Maintain current products and services.

2011-2012 result

Current products and services maintained.

Degree of success

100%

► 2012-2013 objective

Maintain current products and services.

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 appear 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. From the service start date (in 2005) to 31 March 2012 the service had been activated for more than 1,200 visually impaired company customers following a request made by them.

Offering the 'Voice Navigation Service' at vodafone.gr

In March 2010 Vodafone Greece was the first telecommunications company in the country to offer all visitors to our website the option to use the 'Voice Navigation Service'. The service reads out the content of specific pages on the Vodafone Greece website. This frees visitors from the need to stay in front of the screen, allowing them to listen to texts and engage in other activities in parallel. In addition to reading out text, the service also makes it possible to browse the website using suitable keys. They enable the user to listen, browse or follow a link in one of the special menus on the Vodafone Greece webpages, without having to use the mouse. It is aimed at visitors to the Vodafone website who have difficulty reading text such as the visually impaired, the elderly, the dyslexic and people who find it difficult to operate electronic equipment because of some disability. From a visual and functional viewpoint, the service is easy to use and comprehend.

www.blind.gr
Information and communication
portal for people with disabilities



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. During 2011-2012, the Customer Service Department received more than 20 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.

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 (210 5226600).

In 2009-2010 www.blind.gr added additional services, by creating the first internet information reader made possible by installing the RSS WebRhetor Feed phone navigation platform. This new service is intended to optimize use of the website's voice portal which can be accessed by dialing 210 5226600 and allows disabled individuals to directly access information from numerous sources. This tool reads the full text content of info-portals, newspapers, blogs and other websites in real time using RSS WebRhetor Feed.

Websites that provide RSS feeds (or decide in the future to provide such feeds) can join this service free of charge simply by contacting STAT, thereby enriching their website with an additional tool that offers alternative access to all.

Leading bodies from the visually impaired community participate in Blind.gr, such as the National Federation for the Blind, the Pan-Hellenic Association of the Blind, among others, while from April 2011 to 31 March 2012 it received around 2,000 visits to the website and around 2,000 calls a month. 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.

Another service offered by www.blind.gr is voice recognition, making it easier to navigate the website's voice portal. This service allows individuals with severe mobility-related disabilities to use the site, since all that is needed to obtain information is the user's voice. Furthermore, the website continues to provide snippets from articles published in the daily press, as well as notices from associations and bodies for the blind, as well as news about technological developments.

Yet another service offered by the site is blind OCR (optical character recognition) which allows registered users of blind.gr to convert images and .pdf files into accessible, readable text. Using this service, people with impaired vision now have access to online texts which up until now were inaccessible via specialized computer access software (screen and text readers).

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 2011-2012, the following lines received more than 50,000 calls.

- 1031: OKANA Drug Helpline
- 1147: Hellenic National Transplant Organization
- 197: National Center for Urgent Social Aid
- 1056: Smile of the Child
- 1145: Ithaki Helpline (Drug Addict Treatment Center Helpline)
- 116111 EU Support line for children and adolescents, and
- 116100 EU Missing Child Hotline.

At the same time, in 2011-2012 more than 2,950,000 calls were placed over the Vodafone Greece network to emergency services. The main volume was received by the Hellenic Police (100), and the National Ambulance Center - 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)
- Ambulances (166)
- the Fire Brigade (199)

Furthermore, in alignment with our legislation related to 112 Emergency Number, in 2011 Vodafone Greece processed 72 requests from General Secretariat for Civil Protection. In particular, the General Secretariat for Civil Protection asked from Vodafone Greece to locate mobile communication users in danger. The average response time for those cases were covered by the Vodafone Greece network was 61 minutes. For the cases where the user not served by Vodafone Greece network, the response time for the written response is 17.25 minutes. The above time frames include the necessary and mandatory preparation of the required forms and always there is telephone communication with the Authority. These requests are confirmed cases where the mobile subscriber is in danger.

2011-2012 objective

Retain the existing social support lines.

2011-2012 result

Existing social support lines retained.

Degree of success

100%

► 2012-2013 objective

Retain the existing social support lines.

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 their academic studies.

2011-2012 objective

Continue the program.

2011-2012 result

Program was continued.

Degree of success

100%

► 2012-2013 objective

Continue the program.



Supply Chain

Applying the Code of Ethical Purchasing and supplier evaluation methods

Further to our collaboration with suppliers and NGOs and drawing on best practices, Vodafone Group developed a Code of Ethical Purchasing so as to set social and environmental standards. Vodafone expects from all its associates to follow or avoid practices described in the Code. In particular, the Code covers the following issues (for further information, please visit vodafone.com/Sustainability):

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

The compliance of the company's suppliers and associates with the principles of the Code of Ethical Purchasing is a contractual obligation, since these principles are incorporated in all contracts signed by the company and its suppliers and associates.

New supplier qualification procedure

Vodafone Greece has developed a special procedure through which it determines how the company starts collaboration with new suppliers. Any new supplier, wishing to collaborate with Vodafone Greece, must follow the steps below:

1. Sign up at Vodafone Greece electronic records of suppliers and accept the principles of the Code of Ethical Purchasing.
2. Fill in the Self-Assessment questionnaire in which the supplier is invited to give details on the level of compliance of their operation with the principles of the Vodafone Greece Code of Ethical Purchasing.

Based on the supplier's answers in the Self-Assessment questionnaire, a Risk Assessment is carried out regarding the company's cooperation with the supplier, and based on the results of the analysis, it is decided to:

- ▢ Start Vodafone's cooperation with the supplier or
- ▢ Conduct an on-site inspection at the supplier's facilities in order to ensure that their operation is in compliance with the principles described in the Vodafone Greece Code of Ethical Purchasing.

After the successful completion of the aforementioned procedures, "approval" is granted, in order for Vodafone Greece to start cooperation with the new supplier.

During 2011-2012, there was no need for an on-site audit of new suppliers the company collaborated with, since none were rated as 'high risk' suppliers, based on the new supplier qualification procedure.

Supplier audits

In 2011-2012 we conducted audits to two "high risk" suppliers of the company to ensure that the principles of the Code are being implemented. The audits resulted in identifying 10 instances where the suppliers committed to take action to improve their performance.

These instances included:

- ▢ Environmental management issues (8 instances)
- ▢ Promotion of the Code of Ethical Purchasing to the suppliers and sub-suppliers of the inspected company (2 instances)

«Speak Up»

Since 2006-2007, we have developed and launched the 'Speak Up' program, a whistleblowing 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. In October 2011, Vodafone Greece communicated to the main and major suppliers of our company, in relation to 'Speak Up' program (total number of suppliers > 200) the new e-mail address. During 2011-2012, there were no relevant complaints.

2011-2012 objective

Incorporate the updated Code of Ethical Purchasing in the contracts of company's suppliers.

2011-2012 result

The updated Code of Ethical Purchasing was incorporated in the contracts of company's suppliers which are in the English language.

Degree of success

-

► 2012-2013 objective

Incorporate the updated Code of Ethical Purchasing in the contracts of company's suppliers.

Vodafone Greece
Headquarters in Attiki



Employees

Our employees at a glance

In 2011 the company employed 2,122 people (based on the headcount on 31.03.12), 99.1% of whom are employed on the basis of open-ended employment contracts and 0.9% on fixed-term contracts. Moreover, 51.3% of staff are women, 48.7% men and 91.5% of employees are in the 25 to 44 age bracket.

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 future employees, by adopting processes and practices which seek to find and utilize people with talent and special skills.

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 labor agreements based on employee skill. We also offer side benefits.

No. of Employees	
2011-2012	2.122
2010-2011	2.332
2009-2010	2.572

In addition, we have a stock option scheme for specific members of senior management, and we also have a policy performance recognition, and a recognition scheme for all employees to recognize 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.

Operating as a team – The Vodafone Way

In 2008 we reviewed our strategy we also simplified organizational structures, and encouraged suitable forms of conduct to successfully implement our plans and face the challenges of an ever more demanding business environment.

'The Vodafone Way' describes how we should operate and behave towards customers and to each other so that we remain successful in the future. Our goal is for Vodafone to become an admired company. We want our customers to admire us for the experience we offer them, allowing them to communicate freely, reliably no matter where they are or what communication means they choose. Our customers must therefore 'experience' a company that is:

▮ **Customer Obsessed:** We want to exceed our customer's expectations, understand their needs, increase their dedication and do everything to make them feel important.

▮ **Innovation Hungry:** We are creating and offering new, innovative products and services and are constantly improving our systems and procedures so that they are not a barrier to the development and implementation of new or improved ways of working.

▮ **Ambitious & Competitive:** We bring energy and passion to our work, we believe in our abilities and set high standards for ourselves and our teams.

▮ **One Company, Local Roots:** We work as one company across all markets to achieve the best outcome for our customers, employees and shareholders. We value our diversity and build effective teams to deliver outstanding results, taking into account the local aspect of each market we operate in.

In order to achieve our goals, we need to have a consistent way of operating, no matter where we operate.

▮ **Speed:** We operate with speed in the market. We focus on rapid response and set priorities, always ensuring high standards of quality and safety.

▮ **Simplicity:** We make things simple for customers, associates and colleagues.

▮ **Trust:** We are reliable and transparent to deal with, not just with our customers but with each other. We act with honesty, fairness, integrity, in a reliable way and appreciate the trust and loyalty placed in us by our customers, our employees and our associates.

Level of education	
Ph.D.	0.8%
Postgraduate studies	22.8%
University degree	21.3%
Technical Education Institutes	15%
College	7.9%
Institutes of Vocational Education	17.9%
High School	14.3%

Gender	
Women	51.3%
Men	48.7%

Age	
Lowest	18
Highest	67
Average	35.72

Human Resources allocation per Division		
Division	Employees number	Percentage
C.E.O.	5	0.24%
C.O.O.	3	0.14%
CONSUMER COMMERCIAL	495	23.33%
CORPORATE AFFAIRS	20	0.94%
CUSTOMER OPERATIONS	643	30.30%
ENTERPRISE BUSINESS UNIT	148	6.97%
FINANCE	153	7.21%
HUMAN RESOURCES	88	4.15%
INFORMATION TECHNOLOGY	80	3.77%
LEGAL	12	0.57%
PRODUCTS & SERVICES	30	1.41%
REGULATORY & INTERCONNECTION	10	0.47%
TECHNOLOGY	431	20.31%
VODAFONE ALBANIA	4	0.19%
Total	2,122	100,00%

New recruits	
2011-2012	77
2010-2011	96
2009-2010	222

Leavers	
2011-2012	288
2010-2011	336
2009-2010	291

Turnover*	
2011-2012	7.8%
2010-2011	8.9%
2009-2010	7.13%

*
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.

2011-2012

Contract type	Part timers	TEI practice	Full timers	Seasonal	Total
Open-ended	71	0	2,026	0	2,097
Fixed-term	2	1	22	0	25
Total	73	1	2,048	0	2,122

2011-2012

Contract type	Total	%
Open-ended	2,097	98.8%
Fixed-term	25	1.2%
Total	2,122	100%

Age															
Gender	2011-2012					2010-2011					2009-2010				
	<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	12	527	487	63	-	16	639	503	50	1	50	786	463	44	3
Men	14	387	541	83	8	13	491	540	69	10	33	594	519	67	13
Total	26	914	1,028	146	8	29	1,130	1,043	119	11	83	1,380	982	111	16

Positions per gender

	2011-2012				2010-2011				2009-2010			
	Managerial	Staff	Managerial %	Staff %	Managerial	Staff	Managerial %	Staff %	Managerial	Staff	Managerial %	Staff %
Men	103	930	81.7%	46.6%	114	1,009	82.6%	46%	123	1,103	84.2%	45.5%
Women	23	1,066	18.3%	53.4%	24	1,185	17.4%	54%	23	1,323	15.8%	54.5%
Total	126	1,996	100.0%	100.0%	138	2,194	100%	100%	146	2,426	100%	100%

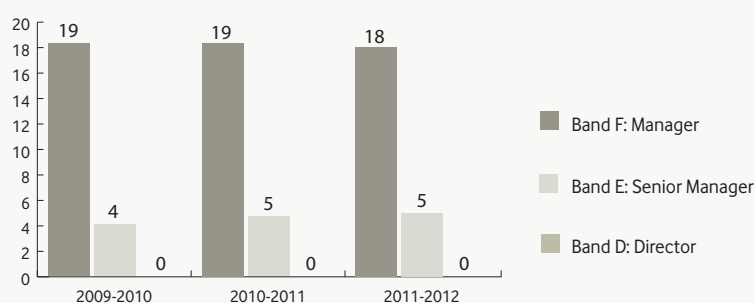
Providing equal opportunities to our employees – Human Rights

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 53.4% of staff and 18.3% of managers are women. Moreover, 2 of the 13 members of the Management Committee are women.

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 labor.

Women in managerial positions per Managerial Band



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.

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)
- ▮ A personalised system for providing online updates to all employees every day
- ▮ The corporate magazine 'joy'.

The gym in Vodafone Greece Headquarters in Attiki



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. Line 3222, to which only company employees have access, can be used to make phone calls. It is accessible from corporate and employee mobile phone numbers (a number that has no fixed fee and is offered to employees at preferential rates) and from office phones. Line 3222 can be used for accounts, services, and IT support.

A human resources help-desk (1700) has been in operation since April 2003. In October 2011 it was renamed Ask HR and 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. During 2011-2012 the help desk received 6,390 calls of which 84.2% were answered immediately by help desk staff. 84.5% of calls were resolved within 24 hours.

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 with each other. At Vodafone Greece we carry out employee surveys at regular intervals to discover their views and how they feel.

People Survey

Once a year, all Vodafone Group companies, in collaboration with specialized external consultants, conduct the People 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 management practices, their career prospects, job security and work conditions, as well as their overall satisfaction. The survey focuses on the key aspects of human resources strategy and in our common way of operation, "The Vodafone Way", and the results are evaluated in order to develop an action plan to improve specific areas. Two key indicators in this survey are:

- The Engagement Index
- The Manager Index
- the Employee Net Promoter Score which measures the intention of company employees to recommend its products and services to relatives and friends.

These indicators are a benchmark for the company both internationally within the Vodafone Group and locally within divisions. The manager's effective management index plays an important role in their evaluation, since it is a sign of the climate a manager creates within his team in order to achieve optimum performance. 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 specific areas.

In the 2011 People Survey, Vodafone Greece achieved a 96% participation rate. All the indicators were up compared to the previous year which was the result of an overall effort made to improve the working environment experience by bolstering employee commitment and dedication. More specifically, the engagement index was 86%, while the manager index was 81%. The Employee Net Promoter Score was 78%, while Vodafone Greece held first place compared to the companies in the Group overall.

Strategy

The idea of Team Work – Communication – Ownership and our common way of operating, "The Vodafone Way" states our goal of becoming an admired company, places customers and innovation at the heart of our operations and encourages suitable behavior for all employees in order to successfully implement our plans and face the challenges of an increasingly demanding business environment.

In 2011-2012 a series of measures were implemented such as:

- Reviews of business issues every four months. In order to improve communication the company holds Team Leadership Meetings every four months attended by around 150 executives to discuss the company's financial results, key performance indicators, its achievements and so on.
- Cross-functional projects to increase interaction between divisions in the mind of customers, in relation to the knowledge of issues and the experience employees have.

➤ The 'Make a Difference' recognition program which commenced in January 2009, with the aim of encouraging employees to take the initiative and propose innovative solutions that could be implemented to add value, and rewarding those ideas which were put into practice. Between April 2011 and March 2012 a total of 45 ideas were suggested.

• 9 applied actions, 5 of them were awarded and refer to:

- A new store credit procedure
- TAZAmobile
- The Vodafone portal for shops
- The 80% cost control service which was the 'solution of the year'
- SIM bonus rewards program for pre-pay plans

• 36 not applied actions were put forward and the possibility of implementing them is being examined.

➤ 'The Vodafone Way Global Heroes' program continued, whose purpose is to identify and reward employees who embrace and live the principles underpinning 'The Vodafone Way' and act in accordance with them every day. This program, which operates in all countries where the Vodafone Group has a presence, is coordinated and supervised by the Human Resources Division. A total of 13 proposals were submitted from April 2011 to March 2012, 6 of which received individual or team rewards. These related to projects of particular importance for the company's objectives and priorities. During 2011-2012 Christos Vitos was chosen for making the difference of the year for the help and assistance he provided the visually impaired with in the Kallithea area where the Blind Association is located. Christos represented the company at the Vodafone Group's annual event for this program.

The 'Voice of the Customer' program was developed and is being run with the support of Vodafone Group Management in the context of 'The Vodafone Way' which places emphasis on customer experience issues, which in effect helps Vodafone Greece executives focus on the customer so as to understand their needs and wishes. The program includes:

- Monthly visits by the Management Committee to corporate customers, Vodafone Greece shops and customer services.
- Continuation of the 'Back to the Floor' program, as part of which management executives from the company visit the market, specifically the Vodafone Greece shops, customer services and business customers.
- Monthly 'Voice of the Customer' meetings with top company executives to solve problems reported by customers.

At the same time the company also offers a specially laid out area called the Vodafone Experience Area to familiarize employees with the company's products and services and customer experience-related issues.

In the same vein, a Customer Obsession Zone has been developed on the intranet accessible to all company employees where they can:

- search for information about our products and services
- test their knowledge of our products
- see how we can get closer to customers.

2011-2012 objective

1. Continued implementation of the 'Pelatis' program, monitoring of results and targeted actions to ensure continuing improvement of the services provided.
2. Continuation of cross-functional projects.
3. Continuation of the recognition programs, 'Make a Difference' and 'The Vodafone Way Global Heroes'.
4. Continuation of the recognition programs, 'Make a Difference' and 'The Vodafone Way Global Heroes'.

2011-2012 result

1. The 'Pelatis' program continued to be implemented for all new employees at Vodafone shops, monitoring of results via the Performance Management Tool specifically designed for that purpose.
2. Cross-functional projects were implemented.
3. 5 actions received awards as part of the 'Make a difference' program and 6 as part of 'The Vodafone Way Global Heroes'.
4. The diversity training courses were not held since the Vodafone Group did not include Vodafone Greece in the pilot program.

Degree of success

1. 100%
2. 100%
3. 100%
4. -

► 2012-2013 objective

1. Redesign the Pelatis program and start running the updated program for all employees at Vodafone shops.
2. Continuation of cross-functional projects.
3. Continuation of the recognition programs, 'Make a Difference' and 'The Vodafone Way Global Heroes'.
4. Attendance by senior executives at diversity training courses.
5. Design and development of a skills development center for the Enterprise Business Unit and Consumer Business Unit.



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 "Talent Reviews" 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 actions for every year which will assist employees in attaining their goals.

Each year 100% of staff (with open-ended contract) 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.

'Talent Reviews' 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. 'Talent Reviews' help us identify and give development and advancement opportunities to employees via promotions and transfers to other departments.

2011-2012 objective

Participation of 100% of employees covered by the annual 'Performance Dialogue' process.

2011-2012 result

100% participation by employees.

Degree of success

100%

► 2012-2013 objective

Participation of 100% of employees covered by the annual 'Performance Dialogue' process.

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 training courses, interactive activities, e-learning and Vodafone Group actions 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. The company also invests in continuously training its employees by financing part of the cost of degree programs.

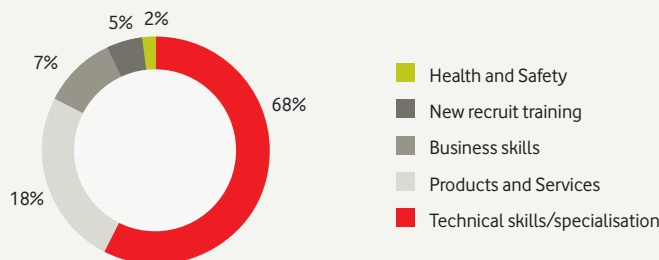
During 2011-2012, Vodafone Greece invested around €500,000 in employee training. Employees attended an average of 11 hours of training and 100% of employees took part in training courses.

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.



The percentage of training hours per category of training 2011-2012



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:

- to develop a common culture and leader skills
- 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 training courses at meeting rooms, 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.

As part of our goal to develop the best working group and to provide a productive work environment which encourages knowledge acquisition and personal development, the Vodafone Group has entered into partnerships with local Vodafone companies to set up Vodafone Academies.

These Academies allow us to bolster our knowledge and skill sets. The actions proposed and the teaching materials available at the Academies are additional aids in developing an integrated, comprehensive set of development actions.

Vodafone Academies include a series of options such as articles, e-learning courses, webinars, videos, case studies, practical guides, development tools, and so on which are chosen depending on the field of interest and the skills that need to be developed to allow employees to perform their jobs better. The materials are updated and improved at regular intervals, and are also an important source of information on all topics and developments in the sector in which each employee works in.

In addition, thanks to our partnership with Harvard Business Publishing, all Vodafone employees now have access to our Harvard Manage Mentor guide which is constantly being updated. Currently in version 11 it helps improve knowledge and promotes personal development. The guide includes a variety of topics that contribute to skills development, team work, managing interpersonal relations better and becoming more effective in our day-to-day activities.

2011-2012 objective

Continue to bolster and support corporate culture by emphasizing 'The Vodafone Way', developing skills and abilities associated with a customer-based approach, and developing executives (such as the training course implemented by the Sales and Customer Service Divisions).

2011-2012 result

A series of programs were implemented for the Sales and Customer Service Divisions with emphasis being placed on developing skills and competences relating to a customer-focused approach such as:

1. training modules as part of the Sales Academies and
2. programs such as Build Your Service Culture and Empower Your Service Skills for the Customer Service Division.

Degree of success

100%

► 2012-2013 objective

Continue to bolster the corporate culture by emphasizing 'The Vodafone Way', by developing skills and competences related to the customer-centered approach and by developing and growing good executives.

'6 Absolute Health and Safety Rules'
promotional material



Strategic partnerships with universities

As part of our goal to develop the best working group and to provide a productive 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 educational institutions which offer courses in issues of importance for the company. The partnership focuses on four key topics which generate mutual benefits for both the academic community and the company itself:

- ▮ Knowledge transfer via one-day training events and 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 to enable students to acquire experience. The 'Discover' program was implemented in 2011-2012 which gave 4 talented young men and women who had or were about to finish postgraduate studies the chance to work for remuneration with the company on specific projects for a 12-month period.

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

2011-2012 objective

Continuation of the Discover program.

2011-2012 result

4 people were recruited.

Degree of success

100%

► 2012-2013 objective

Continuation of the 'Discover' program with the goal of increasing participation and the recruitment of 5 individuals.

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 have held EL0T 1801 certification; which in February 2007 became OHSAS 18001:2007 certification; proof of our response to the requirements for systematic management of employee health and safety issues for employees, associates and customers.

Over recent years, our objective has been to develop a culture of safety which will encourage all employees and associates to behave responsibly when it comes to their own personal safety and the safety of those around them.

To achieve this, Vodafone Greece expects that its executives lead by example, will identify risks, will specify the means to monitor and control performance on H&S issues within their remit and at the same time the company itself also evaluates its executives' performance by attaching priority to specific issues (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 to 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 with at their workplace and also participate in developing company policies to prevent occupational risks.

Table of accidents**2011-2012 2010-2011 2009-2010**

(all accidents cited involved loss of working time)

Fatal accidents involving company staff	0	0	0
Fatal accidents involving associates and contractor's staff	0	0	0
Third party fatal accidents (customers, etc.)	0	0	1
Uncontrolled work-related accidents (i.e. accidents which occurred one hour before or after working hours away from company facilities) involving company staff	1	5	11
Controlled work-related accidents (i.e. accidents at company facilities) involving company staff	3	7	2

At Vodafone Greece in order to confront emergencies, we have prepared and implemented 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 colleagues, associates and customers from buildings if need be. Currently, there are 150 Safety Volunteers.

In order to improve awareness among safety volunteers, the company has set up an e-learning program which explains in simple steps the procedures to be followed before and during the evacuation of premises.

There is a regular 'Health and Safety Week' each year, attended by employees and associates involved in high risk activities so as to raise awareness and provide information, allow views to be exchanged and obtain commitments from everyone about continuous improvement.

We carry out reviews on high risk associates and on-the-spot checks while work is being carried out at our facilities to develop a shared culture when it comes to safety issues. We evaluate their performance and work closely with them to develop improvement plans. We recognize positive behavior and reward associates at global level.

We provide regularly training to employees working at heights about how to work safely at heights, to warehouse staff about safe work in warehouses and the handling of forklift trucks, to company messengers about safe driving and to safety volunteers about first aid and fire fighting.

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.

Our company has adopted the '6 Absolute Rules for health and safety' worldwide, which aim to reduce accidents and incidents across the entire range of its operations. These 6 rules are mandatory for all employees and associates, and the company will not accept any breach of these rules.

- ▮ Mandatory use of Personal Protective Equipment.
- ▮ Avoidance of work with electricity by colleagues and associates who are not certified and suitable for that work.
- ▮ Prohibition of work while drunk or under the influence of prohibited substances.
- ▮ Mandatory use of seat belts when driving.
- ▮ Prohibition of the use of mobile phones when driving.
- ▮ Prohibition on speeding while driving.

In order to brief company executives about the 6 Absolute Rules and foster a Health and Safety at work culture, the company plans various activities such as training sessions/briefings, talks, and so on.

2011-2012 objective

- 1.** No increase in workplace accidents compared to 2010-2011.
- 2.** Training of Health and Safety at work issues for 70% of employees in the Technology Division.
- 3.** Organise a Health and Safety Week.

2011-2012 result

- 1.** 57.14% reduction in workplace accidents compared to 2010-2011.
- 2.** 73% of employees from the Technology Division were training about occupational health and safety issues within their work remit.
- 3.** A health and safety week was organised.

Degree of success

1. 100%

2. 100%

3. 100%

► 2012-2013 objective

1. No increase in workplace accidents compared to 2011-2012.
2. Train 70% of managers of owned shops about occupational health and safety issues.
3. Organise a safety week around the topic 'safe driving'.
4. Provide theoretical and practical training for 180 employees on safe driving issues.

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 *

2011-2012	1,28%
2010-2011	1,48%
2009-2010	1,76%

*
The percentage of days off work lost due to accident or illness divided by the total number of working days (Vodafone Albania is not included).

Moreover Vodafone Greece offers all its employees 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.

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, a 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 engaged in high risk activities (base station employees, warehouse staff and messengers) and daily cooperation with Work Doctors
- ▮ 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 organized for employees' children such as a vocational guidance program implemented in collaboration with specialized 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.



Eco-Efficiency

At Vodafone Greece our objective is to make as much as possible for customers, while consuming fewer resources. Our objective is to reduce environmental impact across the spectrum of our operations, starting from the design and manufacture of products and services that we promote to the market, and including the use and disposal from our customers. These programs are managed as part of the Environmental Management System which is ISO 14001 certified for all the company activities and facilities.

Eco-Efficiency

Environmental aspects of a mobile telecommunications company's operation

1 Electromagnetic fields

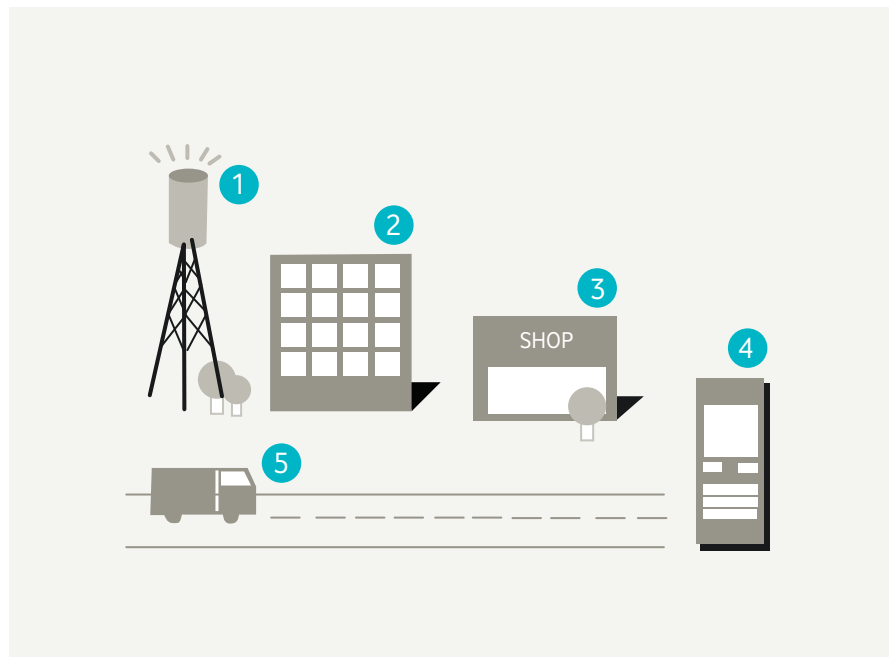
From the operation of the mobile telecommunications network, electromagnetic radio-frequency is transmitted to the environment, thus affecting it. Therefore, the network operation specifications should follow the limits set by international organisations (e.g. International Commission on Non-Ionizing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

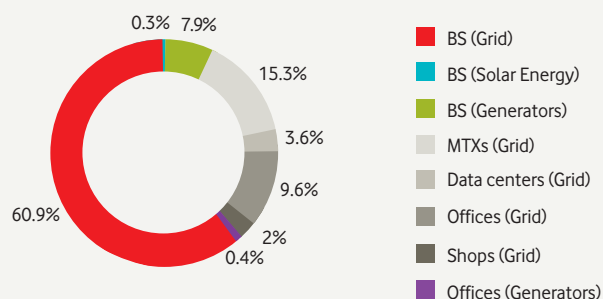
Preventing CO₂ emissions to the atmosphere*

We are implementing programs through which we significantly reduce energy consumption at our network and offices. In 2011-2012 we estimate that we prevented the emission of more than 47,000 tons of CO₂ into the atmosphere via our energy efficiency programs and the use of renewable energy sources, activities which are outlined below. The cost savings from these energy programs are in the order of € 7.2 million, a figure which is translated into 0.71% of the overall company turnover.

*

In 2011-2012 the method for calculating the occupied space of offices and the method for calculating energy consumption and energy savings at base stations with use of renewable energy sources were improved. For that reason the results regarding the amount of CO₂ prevented from emission owing to the company's programs, for the last 2 years, have been adjusted accordingly in order to obtain comparativeness of results. In 2011-2012 total CO₂ emissions took into account emissions due to flights taken by company executives and also due to fuel consumption of company cars. For that reason, the respective results for the last 2 years have been adjusted accordingly in order to ensure comparativeness.

Energy consumption allocation 2011-2012



2011-2012 objective

1. Prevent the emission of 45,000 tons of CO₂.
2. Reduce, by 2020, CO₂ emissions by 50% against a 2006-2007 baseline (this is a Vodafone Group overall commitment).

2011-2012 result

1. The emission of 47,017 tons of CO₂ was prevented.

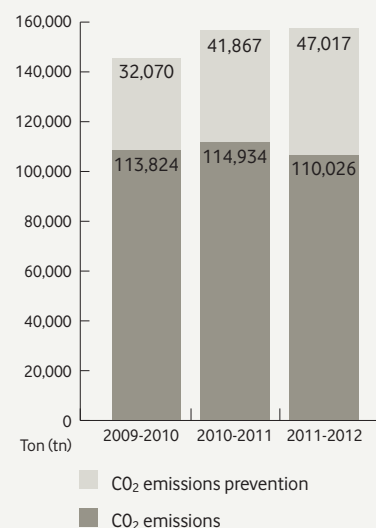
Degree of success

1. 104%

► 2012-2013 objective

1. Prevent the emission of 47,500 tons of CO₂
2. Reduce, by 2020, CO₂ emissions by 50% against a 2006-2007 baseline (this is a Vodafone Group overall commitment).

CO₂ emission prevention from Vodafone Greece programs



Photovoltaic System
in Base Station



Innovating by using renewable energy sources

Since 2001 Vodafone Greece has been systematically investing in the use of renewable energy sources. In particular, we utilize solar energy, having installed hybrid photovoltaic systems at 41 Base Stations, located in non – urban areas, not covered by the national grid, which operate with diesel-fuelled generators. The energy produced by the photovoltaic systems is around 0.5% 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 without power grid connection and therefore reduces CO₂ emissions in the atmosphere.
- Reduces future construction cost of such systems, making them more competitive compared to non-renewable sources.
- Makes them more widely known to the public, thus increasing their acceptance.

In 2006 we built a pilot "green" base station which operated only by using renewable energy sources (solar and wind energy). Despite the positive results, the trial operation of the base station was terminated, since further development of "green" base stations across the company's network is not financially viable.

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



2011-2012 objective

Further improve photovoltaic systems by combining them with hybrid systems (see pages 50-51).

2011-2012 result

Pilot implementation was successfully completed, with gen operation time being reduced by 80%.

Degree of success

100%

► 2012-2013 objective

Further implementation of hybrid scheme at 33 more base stations, thus covering the total number of BSs that can technically support the initiative.

*

The company's network includes Base Stations, MTXs and Data Centers.

**

In 2011-2012 we improved the way we measure the total number of active base stations. This improvement led to re-adjustment of results of the 2 previous years regarding calculation of energy consumption per base station.

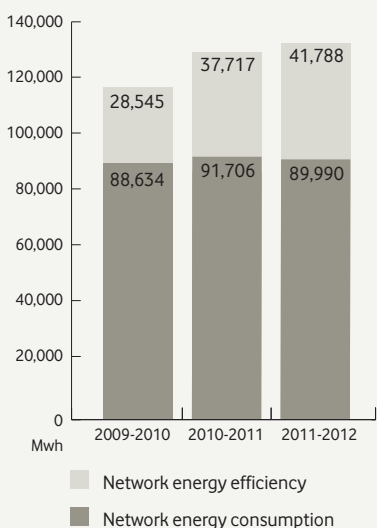
Saving energy across our network*

Heating/Cooling energy savings

Base Stations**

At Vodafone Greece we save heating/cooling energy at Base Stations which accounts for around 50% of their total energy consumption. Savings are achieved by installing 'Free Cooling' systems. These are systems that use automated fans and sensors to reduce the running time of air-conditioning units by taking into account the external temperature, and only ventilating the area, while still maintaining areas adequately cool.

Energy efficiency from programs implemented in Vodafone Greece's network



In this way, these systems reduce energy consumption compared to conventional air-conditioners. Where 'Free Cooling' systems cannot be installed, 'inverter' air-conditioners are used which consume less energy than conventional air-conditioners.

Free cooling systems are installed at all new Base Stations resulting in more than 60% heating and cooling energy savings. Moreover, as part of the network upgrade program, old technology systems are gradually being replaced with new reduced energy consumption technologies.

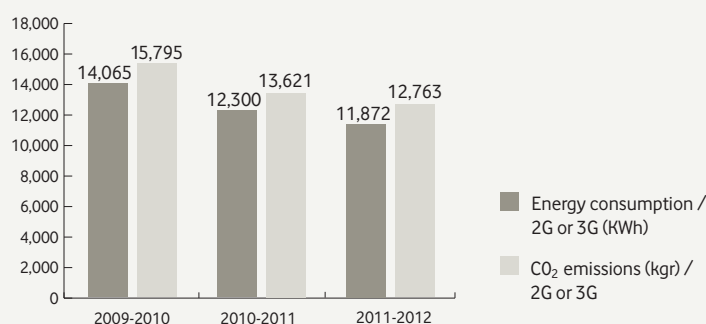
In the 2011-2012 period 8 'Free Cooling' systems and 60 'inverter' air-conditioners were installed at new Base Stations and 14 conventional air-conditioners were upgraded. As a result of these initiatives, around 70% of the Base Stations air-conditioners are now either 'Free Cooling' or 'inverter' systems.

Moreover, we increased the cooling temperature at base stations to 32°C instead of 28°C, thereby significantly reducing energy consumption.

MTXs and Data Centers

Since 2006, at Vodafone Greece we have implemented all the necessary actions, in order to save heating and cooling energy at MTXs and Data Centers which accounts for around 50% of total energy consumption at an MTX/Data Center. In 2011-2012 back-up air-conditioners with a total installed capacity of 1,306 KW at the company's MTXs and Data Centers were kept offline, resulting in energy saving of 1,158 MWh and 1,146 tons of CO₂ prevention from being emitted in the atmosphere.

Energy consumption per network element (2G or 3G)



Since 2008, we have increased the cooling temperature point in the areas of MTXs and Data Centers, from 21°C to 23°C, 25°C or 26°C depending on the needs of each area, thus resulting in 558 MWh energy saving, in 2011-2012, and 552 tons of CO₂ prevented from being released in the atmosphere.

New telecommunications equipment at Base Stations

In 2011-2012 we started replacement of existing 2G and 3G access network equipment with new tech equipment. The new equipment can support both technologies at the same time and is around 25% more energy efficient. In addition, placing part of the equipment outdoors reduces cooling needs thus contributing to further reduction of energy consumption.

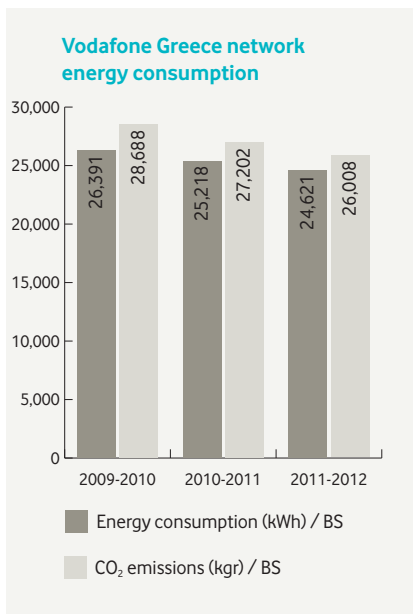
Activation of energy saving mechanism at 2G Base Stations

In 2010-2011 we put in place a mechanism to all 2G Base Stations that monitors in real time the telecommunication traffic of each Base Station and keeps active only the TRXs that are essential to cover the specific needs. Excess TRXs are deactivated, thereby saving energy, which is estimated to be around 4.5% of the total base station energy consumption; while retaining high quality service offered to customers.

Power generation at base stations

Base Stations located in remote rural areas that cannot be connected to the power grid require the use of generators in order to operate. In 2009-2010 we reduced the active number of generators while ensuring proper operation of the respective Base Stations and we managed to reduce diesel consumption by 40%.

Free Cooling



In our endeavor to further reduce environmental impact of gens operation, we have been using since 2010-2011 a hybrid system with batteries. This system is applied at around 289 Base Stations, resulting in a 17.5% drop in diesel consumption. For around 6 hours per day, the generator is taken off line and the Base Station runs on batteries which are then recharged when the generator comes on line again. When the Base Station is run on batteries, only 'Free Cooling' air-conditioners are used. All new Base Stations that do not have access to electricity grid are now constructed in this way from the outset. In 2011-2012 we extended the time period during which hybrid stations are in operation, resulting in operation using batteries for about 10.5 hours per day. The latter initiative resulted in 1,437,428 lt of diesel saved, in 2011-2012, and in 3,852 tons of CO₂ prevented from being emitted in the atmosphere.

Company Switching Centers (MTXs)

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



Electromechanical infrastructure upgrade at MTXs

In 2010-2011 we improved the electromechanical infrastructure at the company's MTXs Metamorfoi to optimize operations. In specific, we upgraded part of the old electromechanical equipment, removed old tech telecom equipment, performed cabling management, made appropriate changes in the indoor space and improved air-conditioning system. This program resulted in 900 MWh energy saving per year, thus annual prevention of 890 tons of CO₂ being released in the atmosphere.

Power quality optimisation of electrical facilities at MTXs

In 2010-2011 we installed special harmonic filters in the electrical panels of Pallini MTX to optimise the power quality of the electrical facilities. Via this program, it is estimated that we annually save 8% of the total energy needed for the operation of the building. In 2011-2012 this figure is translated to 538 MWh energy saving and 532 tonnes of CO₂ prevented from being emitted in the atmosphere.



Data processing facilities optimization at Data Centers

In 2010-2011 we implemented a pilot program at Data Centers of Pallini and Kifisos which utilised state of the art technologies to improve operation effectiveness of computer systems. In specific, we applied virtualization technology, the principle concept of which is that any function can run on either real machinery (physical servers) or virtually, using software programs. The computing power of a physical server is fully utilized by simulating at the same time multiple virtual servers, thereby allowing many systems to run on one 'virtual' system. This reduces the need for physical servers and increases the capacity of existing servers, while improving their performance. We continued implementation of this program in 2011-2012 and we achieved a 1/5.5 "physical" to "virtual" ratio of servers, while 35% of the servers existing in the data centers were converted into virtual ones. In 2011-2012 we virtualized 301 servers, in other words we disconnected 106 servers and avoided the purchase and installation of 195 new ones. As a result, we saved 796 MWh of energy and prevented the emission of 787 tonnes of CO₂ in the atmosphere.

2011-2012 objective

45% savings in network energy consumption.

2011-2012 result

46% savings in network energy consumption (this percentage corresponds to 33,414 MWh energy saving at Base Stations and 8,374 MWh at MTXs and Data Centers).

Degree of success

102%

► 2012-2013 objective

47% savings in network energy consumption.

Vodafone Greece offices energy consumption



Saving energy at the company's offices*

Lighting efficiency**

Since 2001, Vodafone Greece has been one of the 54 founding members of the GreenLight European program. This is a voluntary program where public and private 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 45,000 m² including the building complexes in Halandri, Kifisos, Lykovrysi, Pallini, Pireos and Thessaloniki. Energy savings for lighting at the buildings covered exceeded 20%. In 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. 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 areas covered.

* In 2011-2012 the method for estimating occupied office space was improved and for that reason, results of energy consumption per m² for the 2 previous years have been adjusted accordingly in order to ensure data comparativeness.

** In 2011-2012 we improved the way we measure energy savings as part of the GreenLight program implemented at the company's offices and MTXs. This improvement led to re-calculation of respective results for the 2 previous years taking into account the use of each space examined.

Lead batteries



Idle Power Demand

Since 2004 we have been taking the steps necessary to achieve power factor ($\cos\phi$) 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 environmental benefits have been generated. For example, during the 2011-2012 period, it is estimated that energy savings will be 5,506 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.

All Vodafone Greece shops nationwide actively participated in the WWF's global initiative to combat climate change called 'Earth Hour' for the 4th consecutive year. All Vodafone Greece's shops nationwide turned off their window display lights and store signs for one hour from 20:30 on Saturday, 31 March 2012. 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.

2011-2012 objective

5% reduction in energy consumption per m^2 at offices.

2011-2012 result

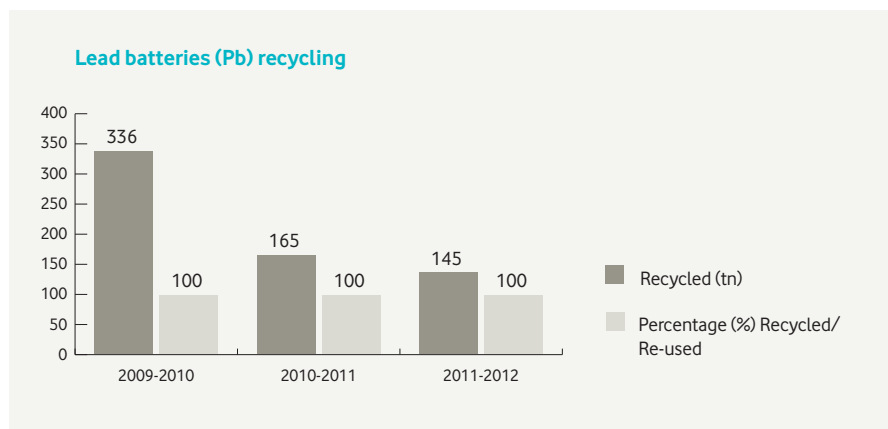
13% increase in energy consumption per m^2 at offices.

Degree of success

0%

► 2012-2013 objective

5% reduction in energy consumption per m^2 at offices.



Recycling lead batteries

At Vodafone Greece we send for recycling the lead batteries we use at the company's network. Used batteries are sent for recycling via an approved battery recycling body. Through this procedure, lead is recycled and as a result, harmful heavy metals are not disposed to landfills. During 2011-2012, 145 tons of lead batteries have been sent for recycling, which accounts for all the batteries stored in our warehouse. Lead from batteries is a substance that accumulates in the environment and can cause, if dumped in the ground, via the water table, long-lasting damages to plants, animals and micro-organisms and therefore to human beings.

2011-2012 objective

100% recycling of stored lead batteries.

2011-2012 result

100% recycling of stored lead batteries (145 tons).

Degree of success

100%

► 2012-2013 objective

100% recycling of stored lead batteries.

Recycling waste oils

In 2011-2012, 25,410 liters of waste oil from our BSs, MTXs and office buildings were sent for recycling via an authorized waste oil collection and recycling scheme. It is worth noting that the hybrid operation of the generator-powered base stations using batteries (see pages 50-51) reduced in 2011-2012, at least by 25%, the operating hours of the generators, resulting in respective reduction of the amount of waste oils collected by 33%.

2011-2012 objective

Documented recycling of 100% of waste oils from Base Stations.

2011-2012 result

1. Documented recycling of 100% of waste oils from Base Stations.
2. 33% reduction (11,372 liters) in waste oils collected from generator-powered Base Stations where the hybrid scheme was implemented.

Degree of success

100%

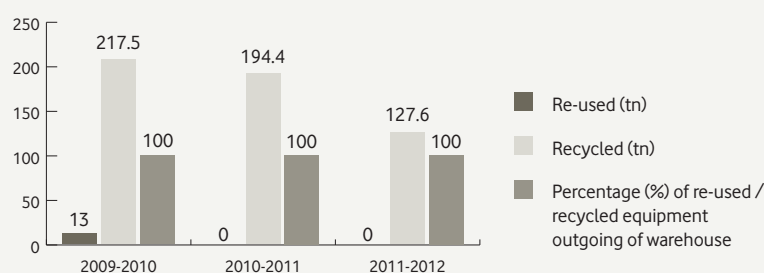
► 2012-2013 objective

Recycling of 100% of waste oils from Base Stations.

Waste oils recycling



Electrical and electronic equipment recycling



Recycling electrical and electronic equipment

At Vodafone Greece we send 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 eliminating the environmental impact of heavy metals such as lead, zinc and cadmium disposed to landfills. In 2011-2012 we sent for recycling more than 127 tons of electrical and electronic equipment (including used light bulbs), corresponding to 100% of the old equipment of the company's network and office buildings.

The program has included light bulbs recycling since 2008-2009. Special collection bins have been placed in the company office buildings and MTXs to collect bulbs from building maintenance works and send them for recycling. Collection bins have also been placed at office buildings for company employees to be able to recycle the light bulbs they use at home. In 2011-2012 we sent 280 kilograms of used light bulbs for recycling.

1. Paper collection bin
2. Toners collection bin
3. Small electrical and electronic appliances collection bin



Since 2008-2009 special collection bins have been placed at 11 of the company's buildings in Attica, Thessaloniki, Larisa, Patra and Heraklion to collect small household electrical and electronic devices. Company employees can now recycle small household electronic and electrical devices that they don't use anymore. In 2011-2012 we sent more than 3 tons of small household electronic and electrical devices for recycling.

2011-2012 objective

Re-use and recycle 100% of electrical and electronic equipment leaving our warehouse.

2011-2012 result

1. 100% of electrical and electronic equipment leaving our warehouse was re-used and recycled.
2. 3.04 tons of small household electronic and electrical devices were recycled.

Degree of success

100%

► 2012-2013 objective

Re-use and recycle 100% of electrical and electronic equipment leaving our warehouse.

* In the "Eco-efficiency" section, "per employee" refers to the average number of employees for the period 2011-2012.

**

The supplier who collects and manages used toner cartridges, with whom we used to collaborate, terminated his cooperation in December 2011. We immediately selected a new supplier and no problems were caused regarding toner collection and recycling. However, there was a problem with obtaining the relevant quantitative data for the period April 2011 - November 2011 and as a result, the available quantitative data for the period December 2011 - March 2012 do not provide an overall picture of how the company performed in this sector.

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 liters) at central locations in the company buildings (such as printing and photocopying areas)
- ▢ paper collection bins (18 liters) in each office/workplace (around 2,200 bins in total)
- ▢ toner cartridges collection bins (55 liters) at central locations in the company buildings (such as printing and photocopying areas).

During 2011-2012:

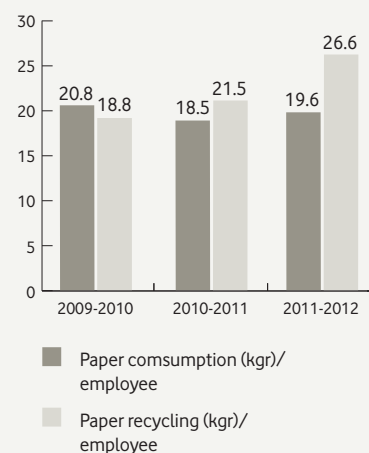
- ▢ there was an increase in paper recycling per employee* (by 24%).
- ▢ more than 102 tons of paper (59 tons of office paper from Attica buildings, 25 tons of advertising leaflets, 18 tons of documents to be scrapped) were sent for recycling, saving more than 1,326 trees
- ▢ 532 toner cartridges were sent for recycling.

The use of paper and toners has a small impact on the environment based on the Risk Assessment we have carried out. However, it consists one of our office activities and therefore we have decided to manage this impact.

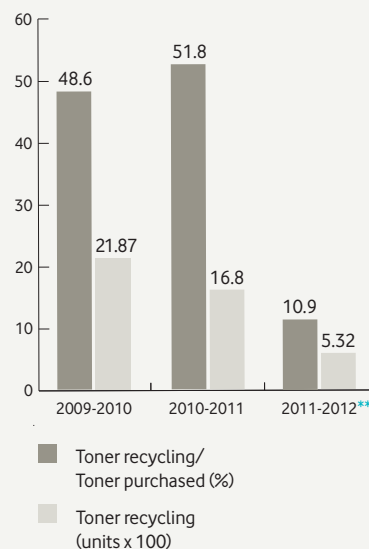
2011-2012 objective

1. Maintain paper recycling percentage per employee in line with 2010-2011 result (21.5 kgr per employee).
2. 60% recycling of used toner cartridges.

Paper use and recycling



Toners recycling



Mobile phones, accessories and household batteries collection bin



2011-2012 result

1. 24% increase in paper recycling per employee in comparison to 2010-2011 (26.6 kgr per employee).
2. 532 used toner cartridges were recycled.

Degree of success

1. 124%
2. Due to insufficient data, it is not possible to evaluate company's performance in this sector.

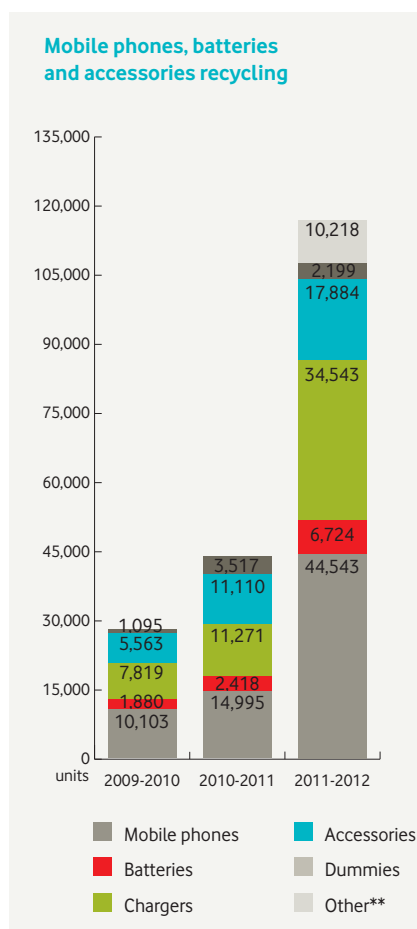
► 2012-2013 objective

1. Maintain paper recycling percentage per employee in line with 2011-2012 result (26.6 kgr per employee).
2. 60% recycling of used toner cartridges.

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 2011-2012 more than 105,000* mobile telecommunications products were collected at

- around 1,000 special bins placed at Vodafone shops and company buildings across Greece, at all scouts of Greece branches, at 147 Vodafone business customers
- 34 recycling events organised in collaboration with SKAI Group and the participation of the public in various areas of Greece.



All mobile phone owners were able to participate in the program regardless of the network operator they use.

Furthermore, after cleaning our warehouses, more than 124,000 mobile and fixed telecommunications products were collected and sent for recycling.

Since January 2009 the mobile phones & accessories recycling program that runs at Vodafone shops has been extended to include fixed telephony devices, laptops, modems and other fixed/mobile/internet equipment and accessories.

After gathering the materials for recycling, used mobile phones, batteries & accessories are collected by a specialised body authorised by the state, which under national law is responsible for the re-use, dismantling and further use of the materials for the production of other materials.

Although the program runs for the 9th consecutive year, public participation is not proportionally in line with mobile phones and accessories sales. According to the available data, in 2011-2012, only 1.4% of the mobile phones sold by Vodafone shops were collected for recycling at our shops and company buildings. However, if we take into account the quantities collected during the recycling events with SKAI Group, the respective percentage increases to 5%.

To enhance public and company employees awareness, in 2011-2012, we took the following steps:

- In February 2012 employees were once again called upon, with great success, to become ambassadors of the mobile phones recycling program and inform their friends too. As a result, more than 1,805 mobile phones were collected.
- By March 2012, 147 business customers had placed 196 Vodafone collection bins at their premises for the collection of mobile phones & accessories.

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

** The word "other" refers to items –besides mobile telecommunication equipment- that were collected during the recycling events in collaboration with SKAI Group and were sent for recycling. These mainly include laptops, modems and other fixed telephony and internet equipment and accessories.

Mobile phones recycling events with SKAI



- In cooperation with SKAI Group we organized 34 mobile phones & accessories recycling events, in various areas of Greece, resulting in sending for recycling 77,946 mobile communications products.
- In cooperation with sport clubs, such as Olympiacos FC and Pierikos Archelaos FC, we placed collection bins at selected areas of their football grounds and also took a series of steps to promote the program.
- We celebrated World Environment Day by participating in events held in collaboration with the Municipalities of Agia Paraskevi, Megara and Neo Psychiko.
- We continued public awareness and training regarding recycling of mobile phone materials, via relevant print inserts.

In 2011-2012 our shops continued to implement the 'Exchange' program to encourage the re-use of mobile phones. 281 mobile phones were collected as part of this program and were sent to a specialized partner for repair and then for sale in developing countries.

2011-2012 objective

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

2011-2012 result

145% increase in the number of mobile phones and accessories collected (105,893 items collected).

Degree of success

967 %

► 2012-2013 objective

Collect 35,000 mobile phones and accessories.

Household batteries recycling program

The household batteries recycling program commenced on a pilot basis at the company's 4 central buildings in July 2004 and was extended in November 2005 to all Vodafone Greece shops and the company's buildings. The program is jointly implemented with the approved body AFIS. In 2011-2012 we sent for recycling more than 8.5 tons of used household batteries (around 285,000 batteries).

2011-2012 objective

Collect 10 tons of used household batteries (around 337,000 batteries).

2011-2012 result

Collection of 8.5 tons of used household batteries (around 285,000 batteries).

Degree of success

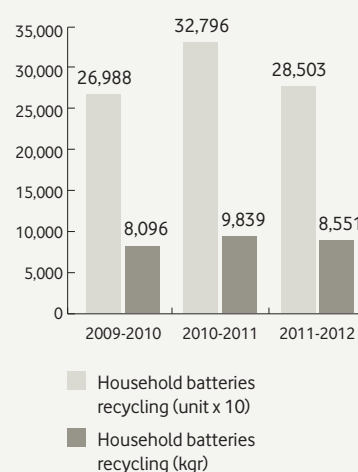
85%

► 2012-2013 objective

Collect 9 tons of used household batteries (around 303,300 batteries).



Household batteries recycling



*

The word "accessories" refers to all mobile telecommunications items—besides mobile phones—which are included in the relevant chart.

Using more environmentally-friendly refrigerants and fire suppressants

At Vodafone Greece we only use fire suppressants with zero Ozone Depletion Potential (ODP), while as part of our scheduled maintenance activities, we gradually replace old refrigerant systems that operate with HCFC R-22 with new ones operating with zero ODP refrigerants. In 2011-2012 the total installed quantity of HCFC R-22 (a substance contributing to ozone layer depletion) reduced by 0.12%. At the same time, overall ODP of installed refrigerants reduced by 3% in comparison with last year's result. Despite our efforts, the number of malfunctions of the refrigerant systems that operate with HCFC R-22 was increased, resulting in a 39% increase in the quantity of R-22 replenished.

2011-2012 objective

5% reduction in the ODP indicator for refrigerant systems.

2011-2012 result

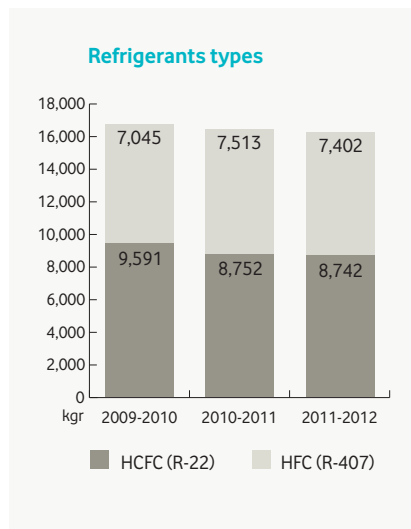
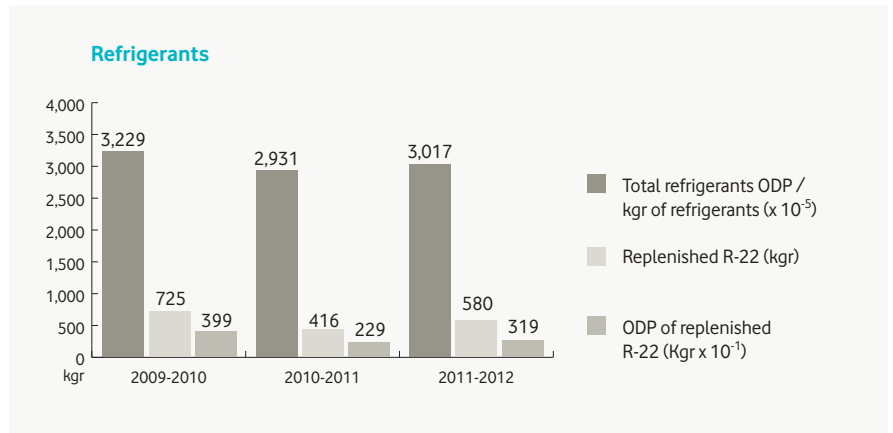
3% increase in the ODP indicator for refrigerant systems.

Degree of success

0%

► 2012-2013 objective

5% reduction in the ODP indicator for refrigerant systems.



Reducing paper consumption

At Vodafone Greece we implement a program that aims to reduce paper consumption for the company's daily needs. Over recent years the company has modified most of its computer software so that all employees that use computers in their day-to-day work, can print two or more pages on one sheet of paper. During 2011-2012, paper use (A4 and A3) per employee increased by 6%. Since September 2007, all payslips have been available to Vodafone Greece employees exclusively in electronic format.

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 post-pay numbers held by company employees, while in September 2010, the company completely stopped sending out such bills. All company employees have access to the particulars of their bill and a full analysis can instead be viewed online at My Account on vodafone.gr. This initiative has resulted in 920 kilos of paper saving per year, which is translated into around 16 trees per year, while the percentage of the employees participating in the program is 81%.

Since July 2009, the company stopped sending full analysis of calls to retail customers, while since November 2010, the company extended the initiative to business customers too. The percentage of customers participation in the program is 87%, resulting in paper saving of more than 154 tons per year, which corresponds to saving of more than 2,610 trees per year.

2011-2012 objective

Maintain paper use for printing purposes per employee in line with 2010-2011 (18.5 kgr per employee).

2011-2012 result

6% increase in paper use for printing purposes per employee compared to 2010-2011 (19.6 kgr per employee).

Degree of success

0%

► 2012-2013 objective

Maintain paper use for printing purposes per employee in line with 2011-2012 (19.6 kgr per employee).

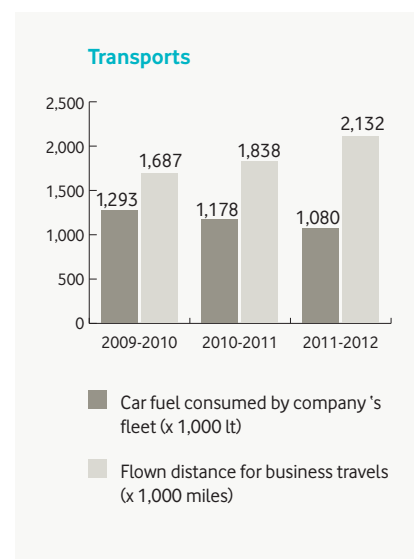
Monitoring the environmental impacts of transport

Based on available data, fuel* consumed by the Vodafone Greece corporate fleet of vehicles dropped by approximately 8% over the last year. At the same time, 795 employees of Vodafone Greece were given the chance to work remotely since they have access to the company network and their company email wherever they are using Vodafone Mobile Connect.

At the same time, the number of air miles travelled increased by 18%** . Since 2008 Vodafone Greece has invested in developing video-conferencing infrastructure to replace the need for its employees to travel by air on business, with the aim of reducing CO₂ emissions from air travel.

In 2011-2012 there were 430 video conferences in total between employees of Vodafone Greece and the Vodafone Group at the conference room facilities at the Halandri building.

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.



2011-2012 result


1. 8% reduction in fuel consumed by company vehicles.
2. 18% increase in the air miles travelled.

*

Fuel consumption data refers to use of special fuel consumption cards that company executives are provided with. For that reason, reported data for the last 2 years have been adjusted accordingly in order to ensure comparativeness of results.

**

2011-2012 data refer to the total of domestic and international trips since we have developed in the company a system to record and monitor all flights. For that reason, reported data for the last 2 years have been adjusted accordingly in order to ensure comparativeness of results (until now data referred only to international trips).



Contribution to Sustainable Societies

The company's future is intimately bound up with the challenges that sustainable development presents. We are focusing on sectors where our mobile technology solutions can help address challenges at an economic, social and environmental level, while at the same time generating new opportunities for the company to develop.



Vodafone Greece Carbon Connections: Quantifying mobile's role in tackling climate change

Contributing to the development of the Greek economy while also generating environmental benefits

Carbon Connections study

In 2009 Vodafone Greece presented the Carbon Connections study, the first quantified study in Greece whose measurable figures show how specific commercially-available mobile telecommunications applications can contribute to stimulating the economy's competitiveness while also addressing climate change. Vodafone Greece prepared this study since current economic conditions require that we focus on how to stimulate development in Greece and how to make Greek businesses, and therefore the economy, competitive. That will have positive repercussions on citizens and businesses while also generating important benefits for the environment.

The results of the study indicate that by implementing 16 smart mobile telecommunication applications, energy costs can be reduced by 2010 by €1.4 billion, while also preventing the emission of 6.4 Mt of CO₂ eq, a figure which accounts for 4.5% of Greece's estimated emissions. To achieve those reductions, 13.6 million mobile telecommunication connections will be needed, which will primarily relate to wireless connections between devices (M2M), and to achieve this significant investments in both telecommunications and IT will be needed.

Of the extensive range of potential mobile telecommunication applications that could reduce energy costs and CO₂ emissions, the Carbon Connections study focuses on 16 smart mobile communications applications in 4 main categories:

- Dematerialisation: This category includes smart mobile telecommunications applications that promote the substitution of physical goods, processes and actual movements with 'virtual' alternatives. Examples are videoconferencing or e-commerce.
- Smart grid: This category includes smart mobile telecommunications applications that promote the efficiency of power distribution grids thanks to active monitoring of the grid and to a reduction in dependence on the central power generating system.
- Smart logistics: This category includes smart mobile telecommunications applications that promote the supervision and monitoring of vehicles and their cargoes to improve logistics efficiency by utilizing vehicles more fully.
- Smart cities: This category includes smart mobile telecommunications applications that promote improved traffic management and better public utilities.

The greatest energy cost savings come from the smart grid category (€0.41 billion) and the smart cities category (€0.55 billion), while machine to machine (M2M) wireless communication applications account for 90% of CO₂ emissions.

The adoption of such smart mobile communications applications could be given a major boost by adopting a suitable regulatory framework accompanied by incentives that would stimulate business investments in those applications. Such a framework and incentives would lay the foundations for more innovation in Greece, for development and for improved competitiveness in the economy overall.

Vodafone Greece, in partnership with other companies in the ICT sector, is already poised to contribute to implementing the majority of the smart applications listed in the study.

The study was prepared in collaboration with Accenture, and is based on the original Carbon Connections study prepared by the Vodafone Group in collaboration with Accenture, which focuses on implementing smart mobile telecommunications applications in 25 countries in Europe.

Offering the Vodafone Web Conferencing service

Vodafone Greece was the first company in the Vodafone Group to release the Vodafone Web Conferencing service. It became available on the Greek market in July 2009 in collaboration with Cisco WebEx Technology. This service is an innovative web conferencing solution that allows users to communicate with associates and customers in a direct and effective manner no matter where they are located worldwide via phone and web conferencing by simply using a phone and an internet connection.

This service fully eliminates the need to travel to hold business meetings, thereby resulting in a drop in fuel consumption on business trips and a corresponding drop in CO₂ emissions into the environment.

Offering the ZeliTrack fleet management service

The ZeliTrack service is a simple-to-use subscriber Web Fleet Management service available exclusively from Vodafone Greece.

The special device installed on the vehicle constantly records the geographical coordinates and transmits the data via GPRS which is then stored and presented to the customer in real time with full reports and historical data about traffic, routes, vehicle operations and other data such as door opening /closure, cargo temperature and driver ID.

The ZeliTrack service allows all companies with a fleet of vehicles to improve the services offered to end customers while also reducing operating costs arising from diesel consumption and thereby reduce its environmental footprint by:

- ▮ using statistical data to more effectively deploy vehicles and reduce itineraries
- ▮ optimizing itinerary scheduling and reduce the number of kilometers travelled
- ▮ monitoring vehicle usage to schedule preventative maintenance more effectively
- ▮ motivating drivers to implement best driving practices.

Offering telemetering and surveillance of photovoltaic facilities using SmartEcometer PV

The SmartEcometer PV service is a comprehensive subscriber service that allows fitters and private power generators to do the following in real time using the Vodafone telecommunications network:

- ▮ to have full control of whether photovoltaic systems are operating properly thanks to error reports
- ▮ to check the amount of power being generated by photovoltaic facilities per hour, day, month and the corresponding amount of money generated
- ▮ to receive updates by sms about the power generated, the output and the daily financial benefit
- ▮ to view complete historical and comparative power generation diagrams compared to the previous time period.

This allows subscribers to the service to ensure efficient, uninterrupted operation of the photovoltaic system, thereby contributing to the percentage of electricity generated by renewable energy sources.

Offering a natural gas consumption checking system SmartEcometer GAS

Vodafone Greece has joined forces with Attica Natural Gas Supply Co. S.A. to provide natural gas consumers in Attica with an innovative service for monitoring consumption levels, called SmartEcometer GAS. SmartEcometer GAS is an innovative, cost-effective solution that allows subscribers, whether household or business consumers, to reliably monitor and check natural gas consumption levels. The service offers:

- ▮ control over natural gas consumption levels from anywhere, any time of the day via the internet and info-SMS.
- ▮ estimation of the cost of consumption
- ▮ the option to view consumption data per day, hour, month, or any selected time period, in the form of diagrams or reports, showing m³ or KWh.
- ▮ the option to view maximum values and consumption averages for each time period
- ▮ the option to compare data from previous consumption periods (if telemetering was available then)
- ▮ updates via sms or email, if consumption goes outside of expected levels in any period
- ▮ updates by email about consumption levels that go over the monthly limit set by the consumer
- ▮ updates about the price of natural gas each month
- ▮ the option to view CO₂ reductions achieved by using natural gas compared to the use of oil

Subscribers to this service are given adequate information in good time about any problems in how the system operates and can also properly plan their consumption, thereby avoiding unwanted costs and energy wastage, as well as CO₂ emissions to the environment.

Telemedicine program: Process of taking and sending examinations



Utilising our technology in the health sector

At Vodafone in 2006 we started supporting a pilot scheme entitled 'Remote Population Groups Medical Parameters Telemetry' 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.

In 2011-2012 the program had extended to cover an additional 13 rural surgeries bringing the total figure nationwide to 30. The program, organized and supported by Vodafone Greece, is being implemented in coordination with the Intermunicipal Network of Health and Social Solidarity of Local Authority, whose members include the municipalities involved in the program, with the participation of Athens Medical Center as the central hospital and technical support and training from Vidavo.

Telemedicine refers to the procedure for obtaining patient examinations from a regional surgery for example and sending them to a central hospital to be examined by specialist doctors such as cardiologists. Telemedicine is based on mobile communication 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 to a central hospital to a specialist cardiologist who will receive the examinations and send back his diagnosis in the same way.

The benefits to patients at 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 addition to covering patients suffering from chronic conditions, the program also covers population groups deemed to be at high risk such as the obese, smokers, etc. In 2011-2012 more than 1,500 examinations were sent by the rural surgeries participating in the program.

Since 2006 at Vodafone Greece we have 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.

In 2009-2010, with the support of Vodafone Greece, the Municipality of Trikala began a telemedicine research program to monitor type 2 diabetes patients at home. The aim of the pilot program is to cover 30 patients chosen by the Trikala General Hospital for a period of 6 months.

2011-2012 objective

Retain existing telemedicine programs.

2011-2012 result

Retain the existing telemedicine programs.

Degree of success

100%

► 2012-2014 objective

Extend the telemedicine program to 100 points across all of Greece.

1. Educational program
«Click... on history»
2. Research program to monitor
the brown bear



Utilising our technology in the educational sector

Working in collaboration with the Foundation for the Hellenic World, Vodafone Greece developed the 'Click... on history' educational program. This program is addressed to Secondary School level students and seeks to highlight local history from the viewpoint of students and to make them more familiar with mobile communications technology as a contemporary tool of education.

As part of the program, students were asked to record their local history using 'smart' mobile phones by utilising the camera, video and voice recorder functions. Students were asked to contact the local community around their school, explore their town, neighborhood or village, collect evidence from family photograph albums, cultural associations and public archives under the guidance of their teachers and experts from the Foundation for the Hellenic World. This research audiovisual material was then uploaded by mobile phone to a specially designed online platform for the program, where it was integrated in well-organised presentations.

This program brings an important contribution to students' education as far as research method is concerned, while it also helps them acquire skills regarding essay creation in electronic form through a process that is bound to have the students' attention. Last, it trains students in carrying out a collective project, since they must form groups, in which they need to co-operate closely in order to submit their final project, while it also familiarizes them with technologies used every day, but in a more creative manner, thereby highlighting the value of using them in an educational setting. The program was implemented at 13 schools in various areas nationwide.

2011-2012 objective

Evaluation of the pilot program and exploration of the potential for extending it to 10 new areas.

2011-2012 result

The program was completed in 13 new areas.

Degree of success

130%

► 2012-2013 objective

Implement the program in 18 new areas.

Utilising our technology in the environmental protection sector

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.



Vodafone World of Difference

This allows exceptionally important data about the brown bear's population status and relations between sub-populations, habitat usage, etc. to be collected. To date the scientific team from ARCTUROS has collected data that has led to significant conclusions being drawn such as the fact that the recorded brown bear population in the area studied was larger than the pre-existing estimates. Based on that information, the scientific team from ARCTUROS was able to take preventative steps and implement proposals, intervene in the planning stages of major technical projects to ensure that the brown bear's habitats remain intact, and that roads are suitably sign-posted for drivers passing through such areas.

2011-2012 objective

Continue the program to monitor the brown bear

2011-2012 result

1. The program to study the movement of large and small carnivores was implemented and extended.
2. A wildlife accidents database was set up.

Degree of success

100%

► 2012-2013 objective

Continuation of the program.

Vodafone World of Difference program

In September 2010 we implemented the Vodafone World of Difference program which gives individuals with vision and passion the opportunity to make their dream come true and work for the charity of their choice on one specific project. This is a global program that has been implemented so far in 22 countries with great success, and has given the opportunity to more than 2,100 individual winners around the world to work for a charitable organization of their choice.

In 2010, the program's first edition, we received 292 applications in total, and we singled out 3 lucky applicants who spend one year worked for their favourite charity and completed successfully their project last January.

- Ketty Alevra took up the management of the new Wildlife care and Environmental Information Centre built by the "ANIMA" Wildlife Protection and Care Association at the Municipality of Saronikos. During her project, Ketty Alevra has actively undertaken coordination of all necessary works for the construction of cages, as well as the gradual transfer of rehabilitated animals to their new locations. She also undertook the daily functioning of the centre as volunteers training, cured birds transportation, feeding and cleaning.

- Konstantinos Kostopoulos has taken the position of Professional Advisor with the Patra Mental Health Association, offering his services to Mental Health patients and their families. Specifically, he implemented 124 individual counseling sessions and 3 10 hours sessions for group counselling. He also implemented a series of meetings with training and professional institutions of the Achaia Prefecture, as well as with businesses, with the aim to strengthening the Association's members' educational training and future professional perspectives.
- Vassiliki Hatzopoulou worked with the "Perpato" Prefecture of Rhodopi Association for the mobility challenged as a Social worker, responsible for issues pertaining to assisting mobility challenged people and accessibility of the Prefecture in its entirety. She significantly contributed to raising resources and following up to construction works in the framework of accessibility, such as KTEL's, camping and beaches in the Prefecture of Rhodopi, while offering psychological support and Counseling services to more than 700 Association's members and their families.

Moreover, we also gave the opportunity to our employees to participate in the program, by spending six months at their favorite non profit charity. The successful candidate, Ioannis Rhoditis, worked at the "Smile of the child" Association as Business Developer at the Southeastern Europe Centre for Missing and Exploited children. His aim was to promote the Centre's activities to competent authorities in Greece and abroad.



Planetbook: Environmental board game

In 2011, during the 6-week application submission period, we received 414 applications from the public. 3 candidates were eventually chosen to work for one year at a charity of their choice. They were:

- ✦ Thanassis Vanezis took up the post of biomechanist at the Walking Analysis Centre of Hellenic Society for the Protection and Rehabilitation of Spastic Children (ELEPAP) in Athens to implement a research program to study upper limb function in children with cerebral palsy.
- ✦ Konstantina Lygizou took up the post of System Development Manager for young people with hearing problems at the Scouts Association of Greece to allow that social group to be able to participate in the Scouts' activities.
- ✦ Dimitris Papandreou worked as Operations Manager on the Additional Child and Teenager Care program run by the Social Solidarity Association 'HELP for children and teenagers, based on Mytilini. The program's objective was psycho-social support for children from troubled families who cannot meet the basic needs.

- ✦ Vangelis Tziritis took up the post of Environmental Advisor with the Prespes Protection Association to plan, implement and evaluate an environmental monitoring system for the water resources in Mikri Prespa Lake.

- ✦ Marios Fournaris, with the help of the program, continued his work as full-time manager at the Wildlife Care and Environmental Awareness Centre of the Alykoni Association on Paros island.

2011-2012 objective

1. Completion of work by the 4 candidates at the charities of their choice.
2. Repeat the program.

2011-2012 result

1. 4 successful candidates completed their job at the charities of their choice.
2. The program was repeated.

Degree of success

1. 100%
2. 100%

► 2012-2013 objective

1. Completion of work by 5 successful candidates at the charities of their choice.
2. Repeat the program.

Programs for the Children

Planetbook: The first environmental board game

In 2009-2010 we developed the first environmental board game, Planetbook, in collaboration with KEAN (Cell of Alternative Youth Activities). Planetbook is aimed both at adults and children and seeks to educate and cultivate awareness about environmental issues by combining learning with fun.

The game is available at no cost to environmental educators in schools nationwide, and it is also widely presented at educational and environmental events.

The environmental organizations Greenpeace, WWF, Archelon, SOS Mediterranean, the Panhellenic Network of Ecological Organizations (PANDOIKO), the Hellenic Ornithological Society & European Expression were also involved in developing it.

2011-2012 objective

Presentation of the game at 20 events nationwide.

2011-2012 result

The game was presented at 23 events nationwide.

Degree of success

115%

► 2012-2013 objective

Evaluate continuation of the program.

1. "LETO" mobile paediatrics and dentistry unit
2. Environmental Educational film 'Earth is our home'



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 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 how human activities affect the environment and also recommends day-to-day things we can do to minimize those effects (like energy efficiency, using renewable energy sources and recycling practices).

The film stars a polar bear and a fish who face a series of challenges in their ecosystem due to our approach to the environment. 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 and educational game.

2011-2012 objective

10,000 visitors to watch the film.

2011-2012 result

22,211 visitors watched the film.

Degree of success

222%

► 2012-2013 objective

Evaluate continuation of the program.

'LETO' mobile pediatrics and dentistry unit

The 'LETO' mobile pediatrics and dentistry unit established by Vodafone Greece and Medicins du Monde in 2003, travels around all of Greece to provide pediatric and dental care to children living in areas where access to healthcare services is more difficult for economic or social reasons. The 'LETO' unit provides the following services:

- └ pediatric examination and free treatment with basic pediatric drug provision
- └ dental examination, treatment and 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.

2011-2012 objective

Examine 4,500 children.

2011-2012 result

6,202 children were examined.

Degree of success

138%

► 2012-2013 objective

Program redesign based on society needs.

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

In 2005-2006 in cooperation with the SOS Children's Villages we established Children's Creativity Workshops at the charity's premises in Athens and Thessaloniki. At these workshops, children from the SOS Villages and from the wider area of Vari and Plagiari receive training and can express themselves through innovative artistic and creative expression methods under the guidance of special instructors.

At the SOS Children's Village in Vari a building has been suitably designed and fully fitted to house:

- └ A music workshop
- └ A visual arts workshop
- └ A theatre workshop
- └ A photography workshop
- └ A cinema workshop
- └ A dance workshop
- └ A new technologies workshop
- └ An environmental awareness workshop

At the SOS Children's Village in Northern Greece in the Plagiari area of Thessaloniki a building has been suitably designed and fully fitted to house:

- ▮ A music workshop
- ▮ A visual arts workshop
- ▮ A cultural events workshop
- ▮ A photography workshop
- ▮ An environmental awareness workshop

To further support the SOS Children's Villages we launched a bag exclusively at Vodafone shops featuring paintings by children who live at the SOS Villages.

The bag was 100% cotton and was on sale from December 2011 at Vodafone shops at €2.90 and all revenues from sales of the bags went to support the educational and pedagogical programs run by SOS Children's Villages. The bag featured paintings done by children from the SOS Villages who took part in the visual arts workshop.

2011-2012 objective

1. Run an environmental awareness workshop at Vari and Plagiari.
2. Re-evaluate and adjust the workshops to meet children's needs.

2011-2012 result

1. An environmental awareness workshop was held at Vari and Plagiari.
2. Workshops were evaluated and 3 new ones were developed (creative movement and dance, cinema and photography) to suit the needs of children.

Degree of success

1. 100%
2. 100%

► 2012-2013 objective

Continuation of the program.

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. 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.

Key objectives of the Home are to help deal with family crises, provide relief to parents and children staying there, and to train young adults about how to live on their own and to allow them to temporarily 'escape' their family environment.

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 team staffing the respite home includes specialists and consists of therapists, social workers, nurses, physical education instructors, sociologists, and special needs teachers.

SOS Villages bag



2011-2012 objective

Accommodate 270 children.

2011-2012 result

254 children were accommodated.

Degree of success

94%

► 2012-2013 objective

Evaluate continuation of the program.

Supporting initiatives to promote the social good

In February 2006 the three mobile telecommunications companies Cosmote, Wind and Vodafone Greece set up the "Prospero" service to support and provide integrated management for charitable events like TV-marathons. This service allows certain 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 organizing 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 19 actions were implemented to raise funds for charitable bodies.

1. Blood donation program
2. Employees volunteerism



2011-2012 objective

Continue the program.

2011-2012 result

1. 15 organisations were supported.
2. The program was implemented throughout the year.

Degree of success

100%

► 2012-2013 objective

Continue the program.

Employee volunteerism program

Vodafone Greece's employees participate in a series of voluntary activities, offering their time, skills and abilities to support charitable purposes. Our aim is to generate the greatest possible benefit for the recipient of such services, and so we chose the SOS Children's Villages as the beneficiary of all our volunteer measures. A team of company employees undertook to renovate the facilities which were to house the new cinema and photography workshops at Vari, to landscape the grounds, and to re-organize the Village's library based on a proper library classification system. The team consisted of 34 company employees who spent a total of 301 hours away from work to study the premises where the new workshops were to be housed, to plan the renovation and carry out the work needed.

Moreover, a team of 30 employees from various company divisions worked to make unique candles and Easter decorations and to sell them at the SOS Children's Villages Easter Bazaar.

For the 4th year in a row 10 employees represented Vodafone Greece at the Global Biking Initiative by cycling from Amsterdam to Düsseldorf to spread the word about the work done by SOS Children's Villages. They managed to raise €12,800 from donations from friends, colleagues and the company which went to SOS Children's Village at Vari. This endeavor motivated a team of company employees and associates to take part in the Athens Classic Marathon for a second year in October. They managed to raise €16,177 which was donated to the SOS Children's Village at Vari.

Since 2002 employees have been systematically involved in collecting clothes and offering them to charities such as Mediciens du Monde, the Greek Red Cross, the Strofi Treatment Center and individual families in the Municipality of Perama. During 2011-2012 around 20 hours were spent in implementing the scheme by a team of employees in the context of their day-to-day work while more than 1,000 items of clothing were distributed.

Running a blood donation program

Since 1996 Vodafone has been implementing a blood donation program at company 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 2011-2012 451 employees took part in the voluntary blood donation scheme and 223 blood units were used by employees and their family.

2011-2012 objective

1. Continue the clothes collection program.
2. Continue the blood donation program.
3. Carry out satisfaction surveys among participants in the Me & My Shadow program.
4. Examine employee intention to participate in volunteerism programs via an in-house survey Plan 2 volunteerism actions based on the results of the survey.

2011-2012 result

1. The clothes collection program was continued.
2. 451 employees participated at the blood donation program.
3. The survey was conducted.
4. The survey was conducted 82% of employees indicated they would be willing to participate in volunteerism programs. 3 volunteerism programs were run.

Degree of success

1. 100%
2. 100%
3. 100%
4. 150%

► 2012-2013 objective

1. Continue the clothes collection program.
2. Continue the blood donation program.
3. Run 4 employee volunteerism programs.

Managing Corporate Responsibility and Sustainability

2011-2012 objective	2011-2012 result	► 2012-2013 objective
Completion of the whistle blowing mechanism for cases of corruption.	The mechanism was notified to the Hellenic Data Protection Authority in October 2010 and we are awaiting approval. ☉	Harmonisation of the whistle blowing mechanism with the proposed mechanism by the Vodafone Group for handling cases of corruption.
Carry out the 4th Stakeholder Engagement Survey.	The survey was rescheduled for 2012-2013 due to the difficulties being faced at present. ☉	Carry out the 4th Stakeholder Engagement Survey.
Develop an action plan based on survey results.	An internal communication plan was prepared. ☉	■
Carry out an Employee Survey.	The survey was rescheduled for 2012-2013 due to the difficulties being faced at present. ☉	Carry out an Employee Survey.
Successful evaluation of the management systems implemented by independent validation agencies.	Management systems successfully evaluated. ☉	Successful evaluation of the management systems by independent validation agencies.
Internal review of the need to retain Vodafone's registration in the EMAS Greece Register.	We will not renew Vodafone's registration in the EMAS Greece Register. The environmental information contained in the Corporate Responsibility and Sustainability Report is now done via the Report's content assurance procedure. ☉	■
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.	Successful assurance of proper implementation and application of corporate processes and control points, including corrective action changes required. ☉	Check proper implementation and application of corporate processes and checks which safeguard: a) the correctness of financial results and b) company revenues.
Obtain validation of the above from independent auditors, who will certify the company's compliance with the requirements of the Sarbanes-Oxley Act.	Validation of company's compliance (comments for improvement were included but these have no impact whatsoever on the financial results) by independent internal and external company auditors, in accordance with the requirements of section 404 of the Sarbanes-Oxley Act. ☉	Successfully obtain validation from independent auditors, who will certify the company's compliance with the requirements of Section 404 of the Sarbanes-Oxley Act.
Continue compliance with British Standard 25999.	Successful audit of the Business Continuity Management System in line with the BS 25999 standard and extension of certification to fixed telephony and internet business customer services. ☉	Continue compliance with British Standard 25999.
Develop website to brief employees about Business Continuity issues.	The Vodafone Security Portal was developed which includes Business Continuity Management issues, Risk Management issues and Crisis Management issues. ☉	Keep Vodafone Security Portal updated to brief employees about Business Continuity issues.
Develop an alternative workplace to be used if the main building facilities are unavailable or inaccessible due to an emergency.	An alternative workplace has been implemented. ☉	■
Exchange best practices.	Best practices exchanged. ☉	Exchange best practices.
Continuation of the print campaign about the 'mobile phones recycling program'.	Continuation of the print campaign about the 'mobile phones recycling program'. ☉	Continue the campaign about the 'mobile phones recycling program' and safely surfing the internet.
☉ Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report)		

Managing Corporate Responsibility and Sustainability (continue)

2011-2012 objective

Information dissemination—awareness raising initiatives implemented for employees about company environmental programs.

■

2011-2012 result

Information dissemination – awareness raising measures implemented. ☉

A new print and online company about safely surfing the internet was launched. ☉

► 2012-2013 objective

Implement information dissemination—awareness raising initiatives for employees about company environmental programs.

■

Responsible Behaviour

Mobile Phones – Masts – Health – Network Deployment

Promote the Vodafone Group network deployment policy principles to internal and external associates.

■

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

Provide support for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the 'HERMES' program to 10 new locations.

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

Provide support to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 5 new areas.

Promotion of Vodafone Group network deployment policy principles to local authority representatives, local communities and base stations landlords. ☉

■

Issues were communicated. ☉

Support was provided for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the 'HERMES' program to 6 new locations. ☉

Support was provided for 1 info-action for the university program 'HERMES' and 11 info-actions for the university program 'ENIGMA'. ☉

Support was provided to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 7 new areas. ☉

Workshop for the promotion of Vodafone Group network deployment policy principles in order to inform the company's employees and contractors, whose responsibilities relate with the network deployment and operation of the company.

Promote Vodafone Code of Conduct to company's contractors, whose responsibilities relate with the network deployment and operation of the company.

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

Provide support for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the 'HERMES' program to 5 new locations.

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

Provide support to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 6 new areas.

Customers

Check of marketing materials to ensure they are compatible with Vodafone Group responsible marketing, guidelines.

1. Leaflet distribution.
2. Implementation of an awareness program regarding safe internet use.

Continue to provide information.

Inform public about Corporate Responsibility and Sustainability issues via articles.

Check was carried out (no non-conformities identified). ☉

1. Leaflet distributed. ☉
2. vodafone.gr/bsafeonline webpage developed. ☉
3. bsafeonline info-events organised in 8 cities nationwide. ☉

Continued provision of information. ☉

Public was informed. ☉

Review the responsible marketing guidelines manual.

1. Leaflet distribution.
2. Hold bsafeonline info-events in 12 cities nationwide.

Continue to provide information.

Inform public about Corporate Responsibility and Sustainability issues via articles.

☉

Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report)

Responsible Behaviour (continue)		
Access to Communications		
2011-2012 objective	2011-2012 result	► 2012-2013 objective
Maintain current products and services.	Current products and services maintained. ☉	Maintain current products and services.
Retain the existing social support lines.	Existing social support lines retained. ☉	Retain the existing social support lines.
Continue the program (academic community).	Program was continued. ☉	Continue the program (academic community).
Supply Chain		
Incorporate the updated Code of Ethical Purchasing in the contracts of company's suppliers.	The updated Code of Ethical Purchasing was incorporated in the contracts of company's suppliers which are in the English language. ☉	Incorporate the updated Code of Ethical Purchasing in the contracts of company's suppliers.
Employees		
<p>1. Continued implementation of the 'Pelatis' program, monitoring of results and targeted actions to ensure continuing improvement of the services provided.</p> <p>2. Continuation of cross-functional projects.</p> <p>3. Continuation of the recognition programs, 'Make a Difference' and 'The Vodafone Way Global Heroes'.</p> <p>4. Attendance by senior executives at diversity training courses.</p>	<p>1. The 'Pelatis' program continued to be implemented for all new employees at Vodafone shops, monitoring of results via the Performance Management Tool specifically designed for that purpose. ☉</p> <p>2. Cross-functional projects were implemented. ☉</p> <p>3. 5 actions received awards as part of the 'Make a difference' program and 6 as part of 'The Vodafone Way Global Heroes'. ☉</p> <p>4. The diversity training courses were not held since the Vodafone Group did not include Vodafone Greece in the pilot program. ☉</p>	<p>1. Redesign the Pelatis program and start running the updated program for all employees at Vodafone shops.</p> <p>2. Continuation of cross-functional projects.</p> <p>3. Continuation of the recognition programs, 'Make a Difference' and 'The Vodafone Way Global Heroes'.</p> <p>4. Attendance by senior executives at diversity training courses.</p> <p>5. Design and development of a skills development center for the Enterprise Business Unit and Consumer Business Unit.</p>
Participation of 100% of employees that covered by the annual 'Performance Dialogue' process.	100% participation by employees in the annual 'Performance Dialogue' process. ☉	Participation of 100% of employees covered by the annual 'Performance Dialogue' process.
Continue to bolster and support corporate culture by emphasising 'The Vodafone Way', developing skills and abilities associated with a customer-based approach, and developing executives (such as the training course implemented by the Sales and Customer Service Divisions).	A series of programs were implemented for the Sales and Customer Service Divisions with emphasis being placed on developing skills and competences relating to a customer-focused approach such as: a) training modules as part of the Sales Academies and b) programs such as Build Your Service Culture and Empower Your Service Skills for the Customer Service Division. ☉	Continue to bolster the corporate culture by emphasizing 'The Vodafone Way', by developing skills and competences related to the customer-centered approach and by developing and growing good executives.
Continuation of the program as 'Discover'.	4 people were recruited. ☉	Continuation of the 'Discover' program with the goal of increasing participation and the recruitment of 5 individuals.
<p>1. No increase in workplace accidents compared to 2010-2011.</p> <p>2. Training of Health and Safety at work issues for 70% of employees in the Technology Division.</p> <p>3. Organise a Health and Safety Week.</p>	<p>1. 57.14% reduction in workplace accidents compared to 2010-2011. ☉</p> <p>2. 73% of employees from the Technology Division were training about occupational health and safety issues within their work remit. ☉</p> <p>3. A health and safety week was organised. ☉</p>	<p>1. No increase in workplace accidents compared to 2011-2012.</p> <p>2. Train 70% of managers of owned shops about occupational health and safety issues.</p> <p>3. Organise a safety week around the topic 'safe driving'.</p> <p>4. Provide theoretical and practical training for 180 employees on safe driving issues.</p>
<p>☉</p> <p>Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report)</p>		

Eco-Efficiency

2011-2012 objective

1. Prevent the emission of 45,000 tons of CO₂.
2. Reduce, by 2020, CO₂ emissions by 50% against a 2006-2007 baseline (this is a Vodafone Group overall commitment).

Further improve photovoltaic systems by combining them with hybrid systems.

45% savings in network energy consumption.

5% reduction in office energy consumption per m².

100% recycling of stored lead batteries.

Documented recycling of 100% of waste oils from Base Stations.

Re-use and recycle 100% of electrical and electronic equipment leaving our warehouse.

1. Maintain paper recycling percentage per employee in line with 2010-2011 result (21.5 kgr per employee).
2. 60% recycling of used toner cartridges.

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

Collect 10 tons of spent household batteries (around 337,000 batteries).

5% reduction in the ODP indicator for refrigerant systems.

Maintain paper use percentage per employee in line with 2010-2011 result (18.5 kgr per employee).

■

2011-2012 result

1. The emission of 47,017 tons of CO₂ was prevented. ☉

Pilot implementation was successfully completed, with gen operation time being reduced by 80%. ☉

46% savings in network energy consumption (this percentage corresponds to 70,558 MWh energy saving at Base Stations and 19,432 MWh at MTXs and Data Centers). ☉

13% increase in energy consumption per m² at offices. ☉

100% recycling of stored lead batteries (145 tons). ☉

1. Documented recycling of 100% of waste oils from Base Stations. ☉
2. 33% reduction (11,372 liters) in waste oils collected from generator-powered Base Stations where the hybrid scheme was implemented. ☉

1. 100% of electrical and electronic equipment leaving our warehouse was re-used and recycled. ☉
2. 3.04 tons of small household electronic and electrical devices were recycled. ☉

1. 24% increase in paper recycling per employee in comparison to 2010-2011 (26.6 kgr per employee).
2. 532 used toner cartridges were recycled. ☉

145% increase in the number of mobile phones and accessories collected (105,893 items collected). ☉

Collection of 8.5 tons of used household batteries (around 285,000 batteries). ☉

3% increase in the ODP indicator for refrigerant systems. ☉

6% increase in paper use per employee compared to 2010-2011 (19.6 kgr per employee). ☉

1. 8% reduction in fuel consumed by company vehicles. ☉
2. 18% increase in the air miles traveled. ☉

► 2012-2013 objective

1. Prevent the emission of 47,500 tons of CO₂.
2. Reduce, by 2020, CO₂ emissions by 50% against a 2006-2007 baseline (this is a Vodafone Group overall commitment).

Further implementation of hybrid scheme at 33 more base stations, thus covering the total number of BSs that can technically support the initiative.

47% savings in network energy consumption.

5% reduction in energy consumption per m² at offices.

100% recycling of stored lead batteries.

Recycling of 100% of waste oils from Base Stations.

Re-use and recycle 100% of electrical and electronic equipment leaving our warehouse.

1. Maintain paper recycling percentage per employee in line with 2011-2012 result (26.6 kgr per employee).
2. 60% recycling of used toner cartridges.

Collect 35,000 mobile phones and accessories.

Collect 9 tons of used household batteries (around 303,300 batteries).

5% reduction in the ODP indicator for refrigerant systems.

Maintain paper use for printing purposes per employee in line with 2011-2012 (19.6 kgr per employee).

■

■

☉

Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report)

Contribution to Sustainable Societies		
Utilising our technology in the health sector		
2011-2012 objective	2011-2012 result	► 2012-2013 objective
Retain existing telemedicine programs.	Retain the existing telemedicine programs. ☉	Extend the telemedicine program to 100 points across all of Greece (2012-2014).
Utilising our technology in the educational sector		
Evaluation of the pilot program and exploration of the potential for extending it to 10 new areas ('Click ... on history').	The program was completed in 13 new areas. ☉	Implement the program in 18 new areas.
Utilising our technology in the environmental protection sector		
Continue the program to monitor the brown bear	1. The program to study the movement of large and small carnivores was implemented and extended. ☉ 2. A wildlife accidents database was set up. ☉	Continuation of the program.
Vodafone World of Difference		
1. Completion of work by the 4 candidates at the organisations of their choosing. 2. Repeat the program.	1. 4 successful candidates completed their job at the charities of their choice. ☉ 2. The program was repeated. ☉	1. Completion of work by 5 successful candidates at the charities of their choice. 2. Repeat the program.
Programs for the Children		
Presentation of the game at 20 events nationwide (Planetbook). 10,000 visitors to watch the film (Earth is our home). Examine 4,500 children (LETO). 1. Run an environmental awareness workshop at Vari and Plagiari. 2. Re-evaluate and adjust the workshops to meet children's needs (Children's Creativity Workshops at the SOS Children's Villages). Accommodate 270 children (Respite home). Continue the program (Prospero).	The game was presented at 23 events nationwide. ☉ 22,211 visitors watched the film. ☉ 6,202 children were examined. ☉ 1. An environmental awareness workshop was held at Vari and Plagiari. ☉ 2. Workshops were evaluated and 3 new ones were developed (creative movement and dance, cinema and photography) to suit the needs of children. ☉ 254 children were accommodated. ☉ 1. 15 organisations were supported. ☉ 2. The program was implemented throughout the year. ☉	Evaluate continuation of the program. Evaluate continuation of the program Program redesign based on society needs. Continuation of the program. Evaluate continuation of the program. Continue the program.
☉ Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report)		

Contribution to Sustainable Societies (continue)

Employees Volunteerism

2011-2012 objective

1. Continue the clothes collection program.
2. Carry out a satisfaction survey among participants in the 'Me & My Shadow' program.
3. Explore employee intentions to participate in volunteer programs by conducting an in-house survey. Plan 2 volunteer actions based on the results of the survey.

2011-2012 result

1. The clothes collection program was continued. ©
2. 451 employees participated at the blood donation program. ©
3. The survey was conducted. ©
4. The survey was conducted 82% of employees indicated they would be willing to participate in volunteerism programs. 3 volunteerism programs were run. ©

► 2012-2013 objective

1. Continue the clothes collection program.
2. Continue the blood donation program.
3. Run 4 employee volunteerism programs.



Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report)

Society - Economy	2011-2012	2010-2011	2009-2010
Turnover (€ million)	1,013.03	1,087.81	1,303.78
Earnings before interest, taxes, depreciation and amortisation (EBITDA) (€ million)	188.15	231.9	320.8
Earnings before taxes (€ million)	117.74	-28.7	96.97
Net sales (€ million)	402.24	430.91	535.36
Cost of goods sold (€ million)	610.80	656.9	768.4
Cost of goods sold (€ million) ²	2,915.32	2,687.76	2,595.95
Social - Income distribution	2011-2012	2010-2011	2009-2010
Income tax (€ million)	3.21	9.78	39.93
Value Added Tax (€ million)	123.30	123.03	115.97
Fee of subscribers billing mobile telecommunications (€ million)	98.01	112.38	113.93
Salaried staff social security contributions (€ million)	20.32	21.56	22.34
Total cost of pay rolling and benefits (€ million)	100.69	108.05	108.43
Competition	2011-2012	2010-2011	2009-2010
Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes	⊙ 0	0	1
Responsible Behaviour	2011-2012	2010-2011	2009-2010
Total Vodafone Greece customer base ³	4,205,596	3,875,703	6,023,315
Complaints through EETT	⊙ 560	512	402
Complaints through the Ministry of Development etc.	⊙ 364	490	511
Total number of employees	⊙ 2,122	2,332	2,572
No. of women in first line managerial level	⊙ 2	2	2
Total number of accidents	⊙ 1 uncontrolled & 3 controlled	5 uncontrolled & 7 controlled	11 uncontrolled - 2 controlled - 1 fatal accident of a third party
New recruits	⊙ 77	96	222
Turnover	⊙ 7.8%	8.9%	7.13%
Number of leavers	⊙ 288	336	291
⊙ Data marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report).			

Eco-Efficiency	2011-2012	2010-2011	2009-2010
Network energy consumption with use of renewable energy sources (kWh)	⊙ 335	457	654
Network and offices diesel consumption (lt)	⊙ 5,525,072	7,415,428	7,964,433
Total network and offices energy consumption (MWh)	⊙ 102,254	104,841	103,000
Total network and offices energy consumption (Gigajoule)	⊙ 368,115	377,428	370,800
Total CO ₂ emissions from network and offices (tn)	⊙ 107,147	111,878	110,523
Total CO ₂ emissions from company operation (tn) (including travelling)	⊙ 110,026	114,934	113,824
Total CO ₂ emissions prevention due to the company's programs (tn)	⊙ 47,017	41,867	32,070
Installed quantity of R-22 refrigerant (kgr)	⊙ 8,742	8,752	9,591
Replenished quantity of R-22 refrigerant (kgr)	⊙ 580	416	725
Ozone Depletion Potential (ODP) indicator for refrigerants / kgr (x 10 ⁻⁵)	⊙ 3,017	2,931	3,229
No of handsets, accessories, batteries collected as part of the recycling program	⊙ 105,893	43,311	26,460
Approximately flight distance covered by employees (miles)	⊙ 2,132,191	1,807,767	1,686,827
No of special constructions	⊙ 45	107	237
Environmental fines (€)	⊙ 25,100	49,500	75,250
Contribution to Sustainable Societies	2011-2012	2010-2011	2009-2010
Programs financial aid (€)	⊙ 396,810	409,954	532,051
Value of products provided to charities (€)	⊙ 0	0	0
<p>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 vodafone.com.</p> <p>2. The assets investments are calculated based on the international accounting standards and the amount depicted is accumulated since company's beginning of operations.</p> <p>3. 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.</p>			
<p>⊙ Data marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report).</p>			

- A**
AccountAbility Standards www.accountability.org.uk
Alkioni www.alkioni.gr
American-Hellenic Chamber of Commerce www.amcham.gr
ARCTUROS www.arcturos.gr
Aristotle University of Thessaloniki www.auth.gr
Association for the Mental Health (S.O.P.S.I.) Patras www.sopsipatron.gr
Athens Chamber of Commerce and Industry www.acci.gr
Athens Medical Center www.iatriko.gr
Attica Natural Gas www.aerioattikis.gr
- B**
Blind.gr www.blind.gr
Blind Hellenic Federation www.eoty.gr
Body for the collection of home batteries (AFIS) www.afis.gr
- C**
Cell of Alternative Youth Activities www.kean.gr
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
Consumers Institute www.newinka.gr
Corporate Social Responsibility Europe www.csreurope.org
- D**
Democritus University of Thrace www.duth.gr/en
Doukas school www.doukas.gr
Dow Jones Sustainability Index www.sustainability-index.com
- E**
Ecocity www.ecocity.gr
Economist conferences www.hazliseconomist.com
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>
Evropaiki Ekfrasi www.ekfrasi.gr/en/framepage.html
- 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
GlobeScan www.globescan.com
Greek Atomic Energy Commission www.eeae.gr
GreenLight www.eu-greenlight.org
Greenpeace www.greenpeace.gr
GSM Association www.gsmworld.com
- H**
Hay Group www.haygroup.com
Hellas online www.hol.gr
Hellenic Accreditation System S.A. (E.SY.D.) www.esyd.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 Data Protection Authority www.dpa.gr
Hellenic Healthy Cities Network www.ddy.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 Disabled Children www.eleppap.gr
Hellenic Society for Social Paediatrics and Health Promotion www.socped.gr
Hellenic Society for the Study of Internet Addiction Disorder www.hasiad.gr
'Help' for the child and the teenager <http://vohthpe.blogspot.gr>
'HERMES' Program for the systematic measurement of EMF www.hermes-program.gr
- I**
International Commission on Non-Ionising Radiation Protection (ICNIRP) www.icnirp.de
International Organisation for Standardisation www.iso.org
- K**
KPMG Advisors A.E. www.kpmg.gr
- L**
Lloyd's Register Quality Assurance (LRQA) www.greece.lrqa.com
- M**
Meda Communication www.meda.gr
Medecins du Monde www.mdmgreece.gr
MEDITERRANEAN SOS Network <http://medsos.gr/medsos/>
Microsoft www.microsoft.com
Ministry of Development, Competitiveness and Shipping www.ypoiouan.gr
Ministry of Public Order and Citizen Protection www.minocp.gov.gr
Municipality of Sofades www.sofades.gr
Municipality of Trikala www.trikalacity.gr
- N**
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
NOKIA www.nokia.com
Nokia Siemens Networks www.nokiasiemensnetworks.com
- O**
Olympiacos F.C. www.olympiacos.org
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
Pierikos Archelaos www.pierikosbc.gr
Public Power Corporation www.dei.gr

Abbreviations

Q

Quality Net Foundation
www.qualitynetfoundation.gr

R

Recycling center (TEXAN)
www.recycling-center.gr

S

Science Center and Technology Museum (NOESIS)

www.tnmth.edu.gr

Scouts of Greece

www.sep.org.gr

SingularLogic

www.singularlogic.gr

SKAI

www.skai.gr

Society for the Protection of Prespa

www.spp.gr

SOS Children's Villages

www.sos-villages.gr

T

The Association for the Protection and Welfare of Wildlife, ANIMA

www.wild-anima.gr

The Council of State

www.ste.gr

The Smile of the Child

www.hamogelo.gr

Therapy Center for Dependent

Individuals www.kethea.gr

U

University of Aegean

www.aegean.gr

University of Patras

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

University of Piraeus

www.unipi.gr/eng_site

V

Vidavo www.vidavo.gr

VPRC www.vprc.gr

W

World Business Council for Sustainable Development

www.wbcsd.ch

World Health Organisation

www.who.int/en/

WWF www.wwf.gr

Y

YMCA Thessaloniki

www.ymca.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

B

BS Base Station

C

CEO Chief Executive Officer

COO Chief Operating Officer

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

EBEN GR Hellenic Business Ethics Institute

EETT National Telecommunications and Post Commission

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

E.SY.D. Hellenic Accreditation System S.A.

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

HOL hellas online

HSSPHP Hellenic Society for Social Paediatrics and Health Promotion

I

ICNIRP International Commission on Non-Ionising Radiation Protection

ISO International Organisation for Standardisation

K

KCQ Key Control Questionnaire

KETHEA Therapy Center for Dependent Individuals

kg Kilogram

Kw Kilowatt

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

MWR Megawatt hours

N

NGO Non-Governmental Organisation

O

O.C.R. Optical Character Recognition

ODP Ozone Depleting Potential

OKANA Organisation Against Drugs

P

Pb Lead

PV Photovoltaic

R

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

TRX Transceiver

V

VAT Value Added Service

W

WBCSD 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	1	4.1 Governance structure	5-8, 14
1.2 Key impacts, risks and opportunities	1, 2-3, 4-19, 70-75	4.2 Chair's role and function	6-8
		4.3 Independent/non-executive members at the board	6-8
Organisational profile		4.4 Shareholder/employee participation	18-19, 38-39
2.1 Name of the reporting organisation	2-3	4.5 Executive remuneration and performance	41-43, 76-77
2.2 Brands, products and/or services	3	4.6 Conflicts of interest at the board	6-8, 14
2.3 Operational structure	4-19	4.7 Board expertise on sustainability	1, 6-8
2.4 Headquarter location	2-3	4.8 Mission and value statements	5-8, 35
2.5 Countries in operation	2-3	4.9 Board governance	6-8, 14, 15, 17, 41-43
2.6 Nature of ownership	2-3	4.10 Evaluation of the Board's performance	6-8, 15, 39-43
2.7 Markets served	3, 76-77	4.11 Precautionary approach/principle	9, 21-22, 56-57
2.8 Scale of the organisation	3, 76-77	4.12 External charters/principles	9-10, 17-19, 30-32, 52-53
2.9 Significant organisational changes	3	4.13 Association memberships	18, 43
2.10 Awards received	3	4.14 List of stakeholders	9-10
		4.15 Stakeholder identification	9-10
Report parameters		4.16 Approaches to stakeholder engagement	9-10, 14-15, 18-19, 23-24, 35, 38-43
3.1 Reporting period	2-3	4.17 Topics raised by stakeholder	9-10, 18-19, 30-31
3.2 Previous report	2-3		
3.3 Reporting cycle	2-3	Economic performance indicators	
3.4 Contact point for questions	2-3	Disclosure on Management approach	76-77
3.5 Content definition	2-3, 9-10	EC1 Direct economic value	3, 76-77
3.6 Boundary of the report	2-3	EC2 Implications from climate change	1
3.7 Limitations on the report's scope	2-3	EC3 Defined benefit plan	45
3.8 Joint ventures, subsidiaries and outsourcing	2-3	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	2, 45, 48, 55, 56, 77		
3.10 Effects of information re-statement	48-53	EC6 Local suppliers approach	35
3.11 Changes from previous reports	2-3, 48-53	EC7 Local recruitment	Not material
3.12 Location of Standard Disclosures	80-83		
3.13 External assurance	2-3, 85-87	EC8 Infrastructure investment	21-26, 32-34, 60-69
		EC9 Indirect economic impacts	27-29, 32-34, 76-77

GRI Indicators	Section / Note		Section / Note
Environmental performance indicators		Social performance indicators: Labour practices and decent work	
Disclosure on Management approach	1, 5-8, 46-59	Disclosure on Management approach	5-8, 36-45
EN1 Volume of materials used	Not material-Vodafone Greece does not manufacture.	LA1 Workforce breakdown	36-37, 76-77
EN2 Recycled materials	Not material-Vodafone Greece does not manufacture.	LA2 Employee turnover	36-37
EN3 Direct energy consumption by primary energy source	47-53, 76-77	LA3 Benefits provided to full-time employees	45
EN4 Indirect energy consumption by primary source	47-53, 76-77	LA4 Collective bargaining agreements	36-38
EN5 Energy saved	49-53	LA5 Minimum notice periods	At Vodafone Greece there is a minimum notice period of at least three months for substantive operational changes which affect staff.
EN6 Initiatives for renewable energy	49-52, 62		43-45
EN7 Initiatives for reducing indirect energy	59, 61-62	LA6 Workforce in joint health and safety committees	43-45, 76-77
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	43-45
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	41-43
EN12 Biodiversity within lands owned		LA10 Training per employee	41-43
		LA11 Lifelong learning	38, 41-43
EN16 Greenhouse gas emissions	48, 76-77	LA12 Career development	36-38
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.	LA13 Employee diversity and governance	Vodafone Greece offers the same pay for the same job irrespective of gender.
EN18 Initiatives to reduce greenhouse gases	48-49	LA14 Basic salary ratio of men to women	
EN19 Ozone-depleting substance emissions	58	Social performance indicators: Human rights	
EN20 NOx and SOx emissions	49	Disclosure on Management approach	5-8, 35
EN21 Water discharge	Not material based on Risk Assessment results.	HR1 Human rights clauses in investment	The company takes into consideration the P.D. 178/2002 (employees rights protection) in cases of important investment agreements.
EN22 Waste by disposal method	46-59	HR2 Supplier screening on human rights	35
EN23 Significant spills	No relevant incident occurred.	HR4 Discrimination	38
EN26 Environmental impact mitigation	46-59	HR5 Association and collective bargaining	38
EN27 Packaging materials	56-57, 76-77	HR6 Child labour	38
EN28 Non-compliance sanctions	23, 76-77	HR7 Forced labour	38
EN29 Environmental impact of transport	59, 76-77		

GRI Relevant Requirements Table

GRI Indicators		Section / Note	Section / Note
Social performance indicators: Society			Social performance indicators: Product responsibility
	Disclosure on Management approach	1, 5-8, 21-26, 32-34, 60-69	5-8, 21-32
S01	Impacts on communities	21-26, 32-34, 60-69	21-26, 31-32, 34
S02	Corruption risks	5-8, 16-17, 35	30-32
S03	Anti-corruption training	5-8, 16, 35	26-27
S04	Actions against corruption	5-8, 16, 35	
S05	Public policy and lobbying	5-6, http://www.vodafone.com/content/index/about/about_us/policy.html	26-27
S06	Political contributions/donations	5-6, http://www.vodafone.com/content/index/about/about_us/policy.html	11-13
S07	Anti-competitive behavior	76-77	11-13
S08	Regulatory non-compliance sanctions	5-8, 11-13, 15, 76-77	
Telecommunications Sector Specific GRI Indicators		Section / Note	Section / Note
Internal operations			Providing access
I01	Investment in telecom network infrastructure	76-77	PA1 Remote and low population density areas
I02	Extended service to not profitable locations	Vodafone Greece has no universal service obligations (Universal Service Obligation), according to legislative and regulatory framework.	At Vodafone Greece we 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.
I03	Health and safety of field personnel	22, 43-45	
I04	Radiofrequency emissions from handsets	22	
I05	Radiofrequency emissions from base stations	21-26	PA2 Overcoming barriers for access and usage
I06	Specific Absorption Rate of handsets	22	PA3 Availability and reliability assurance
I07	Siting of masts and transmission sites	22-24	PA4 Level of availability
I08	Data for sites	Vodafone Greece characterises this information as confidential. However, the company publishes the number of collocations with other mobile telecommunications companies.	www.vodafone.gr 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.

Telecommunications Sector Specific GRI Indicators		Section / Note		Section / Note
PA5	Usage by low and no income people	26-29	Technology applications TA1 Resource efficiency of products and services TA2 Potential replacement of physical objects TA3 Measures of transport and/or resource changes of customer use TA4 Estimates of the rebound effect TA5 Intellectual property rights and open source technologies	49-52, 58-59, 61-62
PA6	Emergency situations and disaster relief	15-16, 34		59, 61-62
PA7	Human rights issues for access and usage	30-31		61-62, http://www.sepe.gr/files/pdf/Executive%20Summary.pdf
PA8	EMF issues communication	21-26, 32		
PA9	Investment in electromagnetic field research	22-23, 25-26, http://www.vodafone.com/content/index/about/sustainability/mpmh/scientific-research/research-programmes.html		61-62, http://www.sepe.gr/files/pdf/Executive%20Summary.pdf
PA10	Charges and tariffs clarification	26-27		http://www.vodafone.gr/portal/client/cms/viewCmsPage.action?pagelid=4341
PA11	Information on responsible, efficient and environmentally preferable use	18-19, 24, 30-32, 52-53, 56-57, 61-62		
Notes The afore-mentioned requirements-indicators refer to Sustainability Reporting Guidelines of GRI (2006) and to GRI Telecommunications Sector Supplement (2003). The additional GRI Indicators are presented in grey color.				

GRI Report Application Level

REPORT APPLICATION LEVEL		C	C+	B	B+	A	A+
STANDARD DISCLOSURES	G3 PROFILE DISCLOSURES OUTPUT	Report on: - 1.1 - 2.1-2.10 - 3.1-3.8, 3.10-3.12 - 4.1-4.4, 4.14-4.15.	REPORT EXTERNALLY ASSURED	Report on all criteria listed for Level C plus: - 1.2 - 3.9, 3.13 - 4.5-4.13, 4.16-4.17.	REPORT EXTERNALLY ASSURED	Same as requirement for Level B.	✓
	G3 MANAGEMENT APPROACH DISCLOSURES OUTPUT	Not Required.		Management Approach Disclosures for each Indicator Category.		Management Approach Disclosures for each Indicator Category.	
	G3 PERFORMANCE INDICATORS & SECTOR SUPPLEMENT PERFORMANCE INDICATORS OUTPUT	Report on a minimum of 10 Performance Indicators, including at least one from each of: Economic, Social and Environmental.		Report on a minimum of 20 Performance Indicators, at least one from each of Economic, Environmental, Human rights, Labor, Society, Product Responsibility.		Report on each core G3 and Sector Supplement* Indicator with due regard to the Materiality Principle by either: a) reporting on the Indicator or b) explaining the reason for its omission.	

* Sector supplement in final version

For Vodafone Greece, Corporate Responsibility and Sustainability is a strategic investment, which is inextricably bound up with our day-to-day operations. The aim of the Corporate Responsibility and Sustainability program is to continue to operate responsibly, to use efficiently the natural resources, the energy and the materials and to use, more systematically, the technology, our products and services for the development of a sustainable society, in economic, environmental and social level.

Every two years we conduct both a Risk Assessment and a Stakeholder Engagement Survey. These identify important issues for the company, allowing us to focus our actions in line with the principles in the AA1000 APS standard. Our aim is to manage our Corporate Responsibility and the content of the company's Corporate Responsibility and Sustainability Report, so that it follows the principles of the AA1000 APS standard.

We continue to face the challenge of the systematic dissemination of the AA1000 APS standard's principles and integrating them into the entire range of company activities. A continuous priority for the company is to keep Stakeholders constantly briefed and aware regarding Corporate Responsibility and Sustainability issues, so that consultations with them generate added value for the company.

Inclusivity

To identify our Stakeholders we evaluate those groups in society that are affected by or affect company operations. We then recognise our Stakeholders' needs and expectations. Our approach includes quantitative and qualitative surveys, interviews with the main categories of Stakeholders and focus groups with opinion leaders. This fosters dialogue, creating a suitable atmosphere within which opinions can be expressed and exchanged. As a result our belief that we understand the needs and expectations of our Stakeholders is reinforced, as well as the certainty that we are managing issues of concern to the company's Stakeholders. We are committed to endeavoring to meet our Stakeholder needs and expectations.

Materiality

From the outset, the company has focused on sectors, which are material for company operations, and on sectors which have been highlighted as important by our Stakeholders. Based on the results of the Risk Assessment and the Stakeholder Engagement Survey, the most important sectors for Vodafone Greece are:

Responsible behavior

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

Eco-efficiency

6. Energy efficiency and use of renewable energy sources
7. Recycling
8. Use and promotion of environmentally friendly products and services

Contributing to sustainable societies

9. Developing and promoting services that lead to a low carbon economy
10. Utilising mobile communications technology in the health, environmental protection and education sectors
11. Vodafone World of Difference
12. Programs for Children
13. Employees Volunteerism

The pages of this Report describe specific programs with measurable results that the company has implemented in the aforementioned sectors.

Responsiveness

We strive to meet our Stakeholders' needs and expectations, using the feedback obtained from dialogue with them. The needs and expectations expressed are taken into account in relation to company's operation. As a result, we set specific measurable objectives for every program we implement, to be achieved within a specific time frame, which we also publish. We also publish the results of our programs irrespective of whether the specific objectives have been achieved or not, in our effort to reinforce transparency.

The biggest challenge that the company faces today and will continue in the future as well, it involves sustainability and how anyone can respond to that challenge. Due to this challenge, we strategically invest in utilising our technology to promote the society's sustainability in economic, social and environmental terms. Our progress in that sector is described in the Corporate Responsibility and Sustainability Report. The areas we have focused on include utilising our technology to stimulate the competitiveness of Greek businesses, while generating benefits for the environment, and the fields of healthcare, the education and environmental protection.

Independent Limited Assurance Report to the Management of Vodafone

KPMG Advisors A.E. was engaged by Vodafone-Panafon Hellenic Telecommunications Company S.A. (further referred to as "Vodafone" or "the Company") to provide limited assurance over selected aspects of the Greek version of the Vodafone Corporate Responsibility and Sustainability Report 2011-2012 (further referred to as the "Report") for the reporting period ended 31 March 2012.

What was included in the scope of our assurance engagement?

Our engagement was designed to provide limited assurance in accordance with ISAE 3000¹ and the requirements for a Type 2 assurance engagement under AA1000AS (2008)² on the following aspects of the Report (assurance scopes):

1. the application of AA1000APS (2008)³ principles, as described on page 84 of the Report,
2. the reliability of the "Managing Corporate Responsibility and Sustainability" section marked with the symbol © on pages 4-19 of the Report,
3. the stated results against objectives marked with the symbol © and reported in the "Objectives – Results – New Commitments Table" on pages 70-75 of the Report,
4. the reliability of performance data for 2011-2012 marked with the symbol © and reported in the "Main Figures in Table Form" section on pages 76-77 of the Report,
5. Vodafone's self-declared Global Reporting Initiative (GRI) application level of the Report, including the telecommunications sector specific GRI indicators.

The nature, timing and extent of evidence-gathering procedures for limited assurance is less than for reasonable assurance, and therefore a lower level of assurance is provided for the data and objectives under the limited assurance scope. Readers should note that moderate level of assurance in AA1000AS (2008) is consistent with limited assurance in ISAE 3000.

We have not been engaged to provide assurance over any prior reporting period data or information presented in the Report.

Which reporting criteria did Vodafone use?

Vodafone applies the AA1000APS (2008) criteria for the three principles of inclusivity, materiality and responsiveness as described on page 84 of the Report.

For the Report, Vodafone applies the Sustainability Reporting Guidelines (G3) of the GRI as declared on page 1 of the Report.

Our conclusions are based on the appropriate application of the abovementioned criteria.

What was excluded from the scope of our assurance engagement?

The scope of our work did not include the financial data of the Company contained in the Report.

To obtain a thorough understanding of Vodafone's financial results and financial position, the 2011-2012 audited financial statements should be consulted.

1. International Standard on Assurance Engagements (ISAE) 3000: Assurance Engagements other than Audits or reviews of Historical Financial Information, issued by the International Auditing and Accounting Standards Board.
2. AA1000 Assurance Standard (2008), issued by AccountAbility.
3. AA1000 Principles Standard (2008), issued by AccountAbility.

Which assurance standards did we use?

We conducted our engagement in accordance with ISAE 3000 and the requirements for a Type 2 assurance engagement under AA1000AS (2008). A Type 2 Assurance Engagement covers not only the nature and extent of the organization's adherence to the AA1000APS (2008), but also evaluates the reliability of selected sustainability performance information.

We conducted our engagement in accordance with the "IFAC Code of Ethics for Professional Accountants" which requires, among other things, the independence of the members of the assurance team and of the assurance organization, including not being involved in writing the Report. The Code contains detailed requirements regarding the integrity, objectivity, confidentiality and professional competence and behavior. KPMG has internal systems and processes to monitor compliance with this Code and to prevent potential conflicts regarding independence. Our engagement was conducted by a multidisciplinary team with extensive experience in sustainability (including environmental, social and financial aspects) and sustainability assurance.

What did we do to reach our conclusions?

We planned and performed our work to obtain all the evidence, relevant documentation, information and explanations that we considered necessary in relation to the above scope. Our work included the following procedures using a range of evidence gathering activities which are further explained below:

- ▮ Inquiries of management to gain an understanding of Vodafone's processes for determining the material issues for its key stakeholder groups inclusive of an evaluation of the results of Vodafone stakeholder consultation processes and their methodology.
- ▮ Interviews with senior management and relevant managerial staff of Vodafone concerning sustainability strategy and policies for material issues, and the implementation of these across the business.
- ▮ Interviews with relevant Vodafone staff responsible for providing information in the Report, during which we also reviewed the systems and processes for information management, internal control and processing of the qualitative and quantitative information, at Company level. We also tested on sample basis the reliability of underlying data for the selected performance data within the scope of our assurance.
- ▮ Enquiring about Vodafone's assertions and explanations regarding progress against objectives through evidence collection, covering internal and external documentation such as correspondence, minutes of meetings, reports, presentations and research and survey results.
- ▮ Visits to the central offices of Vodafone in Athens, which were selected on the basis of a risk analysis including the consideration of both quantitative and qualitative criteria.
- ▮ A media analysis and an internet search for references to Vodafone during the reporting period.

- ▮ Review of the Report to ensure there are no disclosures that are misrepresented or inconsistent with our findings.
- ▮ Checking the GRI Index provided by Vodafone, to ensure consistency with the GRI application level requirements of A+.

What are our conclusions?

The following conclusions should be read in conjunction with the work performed and scope of our assurance engagement described above.

Assurance scope 1: On the AA1000APS principles of Inclusivity, Materiality and Responsiveness (limited assurance):

Nothing has come to our attention to suggest that Vodafone's description of its alignment with the AA1000APS (2008) principles on page 84 of the Report, is not fairly stated in all material respects. Without affecting our conclusion, the following are recommended:

- ▮ In relation to the principle of inclusivity, Vodafone's stakeholder engagement could be further strengthened by reconsidering the current - biennial - frequency of application. The more frequent the structured contact with stakeholders, the more usable its results in terms of grasping the pulse of a dynamically changing society and making proactive choices regarding its needs.
- ▮ In relation to the principle of materiality, Vodafone could enhance the presentation of the impact and materiality analysis by incorporating a suitable materiality map in the Report.
- ▮ In relation to the principle of responsiveness Vodafone could communicate to its stakeholders the applied response mechanism making reference to its rationale in respect to response prioritization, planning, implementation and stakeholder feedback.

Assurance scopes 2, 3 and 4: On the reliability of selected section and data, and results against selected objectives (limited assurance):

Nothing has come to our attention to suggest that the reliability of the "Managing Corporate Responsibility and Sustainability" section marked with the symbol © on pages 4-19 of the Report, the stated results against objectives marked with the symbol © reported in the "Objectives – Results – New Commitments Table" on pages 70-75 of the Report, and the reliability of performance data marked with the symbol © for 2011-2012 reported in the "Main Figures in Table Form" section on pages 76-77 of the Report, are not fairly stated in all material respects.

Assurance scope 5: On the self declared GRI application level (limited assurance):

Nothing has come to our attention to suggest that Vodafone's self-declaration of GRI application level A+ on pages 1 and 83 is not fairly stated in all material respects.

Without prejudice to our conclusions for all the assurance scopes, as presented above, we provide Vodafone's management with an internal memo presenting in more detail specific findings and areas for improvement.

Responsibilities

Vodafone's Management are responsible for preparing the Report, and the information and statements within it. They are responsible for identification of stakeholders and material issues, for defining objectives with respect to sustainability performance, and for establishing and maintaining appropriate performance management and internal control systems from which reported information is derived.

Our responsibility is to express our conclusions in relation to the above scope. Our assurance report is made solely to Vodafone in accordance with the terms of our engagement. Our work has been undertaken so that we might state to the Company those matters we have been engaged to state in this assurance report and for no other purpose. We do not accept or assume responsibility to anyone other than Vodafone-Panafon Hellenic Telecommunications Company S.A. for our work, for this assurance report, or for the conclusions we have reached.

KPMG Advisors A.E.



A handwritten signature in black ink, appearing to read 'George Raounas'.

George Raounas

Partner

Athens, 6th November 2012



vodafone

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