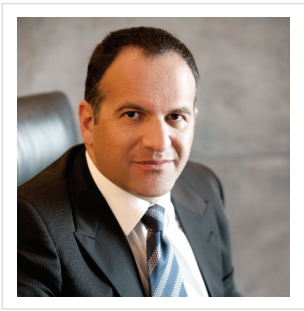




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Letter from the CEO

In these difficult economic times, Vodafone Greece's objective is to be there for consumers, to listen to their needs and to respond to them. In light of that, in the year ended, we developed service plans for individuals and businesses bearing in mind the real economy, while also covering their communication needs. We continued to invest in our technology so that we can continue to provide extensive coverage via our 3G network, quality communication as well as rapid mobile internet. We launched innovative products and services with the aim of providing solutions that will stimulate development in Greece and improve the competitiveness of Greek businesses while also offering environmental benefits. We revised our Corporate Responsibility and Sustainability strategy to make a positive contribution to the challenges we face today. Revising that policy led us to put three strategic pillars in place, which in effect ensure that the company continues to operate responsibly, makes efficient use of natural resources, energy and materials, while also systematically utilising our technology, products and services to develop a sustainable society in economic, social and environmental terms.

We prepared a Carbon Connections study in partnership with Accenture which presents specific quantitative data showing that smart applications that utilise mobile telecommunications technology can contribute to a drop in the operating costs of Greek businesses by reducing the expenditure required to meet their energy needs, while helping address climate change by reducing carbon emissions. If businesses adopted just 16 smart mobile telecommunications applications they could generate savings of € 1.4 billion in the energy costs which businesses pay to cover their operating needs, with a corresponding 6.4 MT CO₂eq reduction in carbon emissions which corresponds to 4.5% of emissions in Greece in 2020. To achieve those reductions 13.6 million mobile telecommunication connections will be needed -most of which are related to wireless

communication between devices- which will contribute to the development of the information and communication technologies (ICT) sector overall. We have already developed strategic partnerships to put integrated products and services on the market such as the fleet management service ZeliTrack and the video conferencing service Vodafone Web Conferencing.

At the same time we are continuing to utilise our own technology in the fields of health and environmental protection, through our telemedicine program and the program to protect the brown bear, and for the first time this year we ran a pilot program that uses our state-of-the-art technology, our network and smartphones in the educational sector.

Our strategic aim remains to reduce the impact of company operations on the environment, through systematic programs implemented in the energy savings and recycling sectors. The results of the energy savings programs we implemented on our mobile telecommunications network and office buildings show that in the 2010-2011 period we managed to prevent more than 41,000 tonnes of CO₂ being emitted, which corresponds to 39,000 MWh of electricity. In parallel, from 2006-2007 onwards we have managed to reduce CO₂ emissions per MB of network traffic (all calls, sms and internet usage via the Vodafone network) by 66%, far exceeding the target we had set for ourselves. We also sent more than 43,000 mobile communication products including mobile phones, chargers and accessories, and more than 10 tons of household batteries to be recycled.

Our 'Parent's Guide' which was updated with the help of the Hellenic Society for the Study of Internet Addiction Disorder and the Hellenic Society for Social Paediatrics and Health Promotion and provides practical hints and tips about how parents can guide their children about responsible use of mobile telecommunications technology and the internet.

We are firmly committed to ensuring that our products and services are accessible to all our customers. Against that background, the company website now provides a Voice Navigation Service and we also continue to provide the Vodafone Speaking Phone service to the visually impaired, and a service to hearing-impaired customers. We also supported the innovative, multi-purpose information and communication portal for the disabled, www.blind.gr.

This 9th 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 7th consecutive year we are employing the Global Reporting Initiative (GRI) international guidelines to ensure that our results are reported objectively and transparently. In recognition of our endeavour to constantly improve the range of information included in the Corporate Responsibility and Sustainability Report and its accuracy, we are proud to announce that the content of this year's report has been rated at GRI application level A+, and we have also ensured that the content of the Report is compliant with the principles of the AA1000 standard following an audit by an external, independent body.

Glafkos Persianis
CEO

Our mission

To be the leading company in communications and to be admired for our ethical and responsible operation, our multifaceted work and services that contribute to sustainability, via:



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.

Possibility – using mobile technology to deliver a sustainable future



Certainty – trustworthy, respected and not letting our customers down

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 9-12). 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 lead to a carbon low economy
10. Utilising 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 9th 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 2010 to 31 March 2011 (2010-2011 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 Group' refers to Vodafone Group Plc which indirectly holds 99.871% of Vodafone Greece's share capital.
- ▮ The 2010-2011 objectives cited in this report were laid down in the Corporate Responsibility Report for the 2009-2010 financial year, which is available on the website vodafone.gr.

Sources of information

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

- ▮ The EMAS Environmental Statement is also available at vodafone.gr.
- ▮ The current Corporate Responsibility and Sustainability Report that refers to the financial year 1 April 2010-31 March 2011, 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 Environment section of this report, with the exception of data for the Mobile Phones and Accessories 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

Nafsika Zevgoli

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1-3 Tzavella St., Halandri

Athens GR-15231

email: CR.gr@vodafone.com

Vodafone Greece customers can send

a SMS, free of charge, to 1256

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

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 Assurance Report can be found at the end of the Corporate Responsibility and Sustainability Report.

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

05/2010 Vodafone Greece presented the Carbon Connection study

06/2010 Exclusive strategic partnership agreement between SingularLogic and Vodafone Greece

06/2010 Honorary award for Vodafone Greece's telemedicine program, at the WITSA Global ICT Excellence Awards 2010

06/2010 Vodafone Greece exclusively launched the innovative Vodafone Mi-Fi Hotspot in Greece

06/2010 Gold 'Specified model criteria' - Business Ethics Excellence Certified Award from the Hellenic Business Ethics Network (EBEN GR)

06/2010 Ecopolis 2010 award for Environmental Project Sponsorship for the brown bear scientific monitoring program in collaboration with ARCTUROS from the Ecocity organisation

06/2010 New innovative office automation service from Vodafone Greece in collaboration with Microsoft

06/2010 Vodafone reduced data roaming charges in Europe by up to 88%

06/2010 Vodafone Greece offered mobile phones at the lowest prices on the market

07/2010 Vodafone Greece won the prize for the best Customer Service Center of the Year as part of the National Customer Service Awards

07/2010 Vodafone Greece won 2 Effie awards

07/2010 Vodafone Greece exclusively launched the HP mini 5102 on the Greek market, the first netbook with a touch screen

08/2010 Vodafone Greece launched the iPhone 4 in Greece on 27 August

09/2010 The Scouts of Greece and Vodafone Greece celebrated two years of partnership in the mobile phone and accessories recycling program

09/2010 The innovative social investment program 'Vodafone World of Difference' was launched in Greece

09/2010 Vodafone Greece and hellas on line, make integrated home communication more affordable in the context of their strategic partnership

10/2010 Vodafone Greece introduced the new Samsung tablet, the Galaxy Tab P1000

10/2010 Vodafone Greece presented the Vodafone Joy 845, the cheapest smartphone on the market

11/2010 Vodafone Greece participated in the Athens 28th Classical Marathon to support the SOS Children's Village at Vari

11/2010 Vodafone Greece introduced new type of phone bill, simpler and clearer than ever before

11/2010 Vodafone Greece launched the innovative 'Full Sima' solution which provides high quality 3G coverage indoors

11/2010 Vodafone Greece achieved the highest possible rating according to WWF Hellas' Environmental Management and Disclosure Index evaluation report

11/2010 Vodafone Greece released a new "Parents' Guide". Everything parents need to know about mobile and fixed communications and the internet

11/2010 Vodafone Greece reduced the cost of using smartphones for subscribers travelling in Europe

02/2011 Vodafone Greece announced the availability of the new Samsung Galaxy Tab 10.1

02/2011 Vodafone and LG Electronics presented the first smartphone worldwide with a dual core processor

03/2011 From 2 May 2011 onwards, Mr. Nikos Sophocleous, Chairman of the Board of Directors and Chief Executive of Vodafone Greece remained as head of the company, in the post of Chairman. Mr. Glafkos Persianis was appointed as CEO

03/2011 Vodafone Greece participated in the 'Earth Hour' action against climate change for the third consecutive year


03/2011 As part of the 'Challenger' program, for the second consecutive year Vodafone Greece gave young people the chance to get a dynamic start to their career

03/2011 For the second consecutive year, Vodafone Greece organised its employee volunteer scheme called 'Me and My Shadow' to support the SOS Children's Villages

Vodafone Group - Vodafone Greece: Key financials and statistics

Vodafone Group	2010-2011 (€ m)	2009-2010 (€ m)
Revenue	45,884	44,472
Adjusted Operating Profit	11,818	11,466
Free cash flow	7,049	7,241
Closing proportionate customers (m)	347.7	341.1

Vodafone Ελλάδα	2010-2011 (€ m)	2009-2010 (€ m)
Turnover	1,087.81	1,303.78
Earnings before interest, taxes, depreciation and amortisation (EBITDA)	231.9	320.8
Earning before taxes	-28.7	96.97
Net sales	430.91	535.36
Total investment in assets	2,687.76	2,595.95
Cost of goods sold	656.9	768.4



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 recognised bodies. We recognise 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 moral issues we might have to face, but our Business Principles are designed so as to ensure that our stakeholders know that Vodafone Greece always endeavours to make responsible choices.

Responsibility is part of our Business Principles, Strategy and Governance

Our Code of Conduct

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

The company's vision and goals must be 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 our responsibilities towards all stakeholders which are –directly or indirectly– affected by our business activities.

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



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

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

The most effective assurance mechanism is constant vigilance by all of company employees, at all times, to ensure that Vodafone Greece is committed to maintain the highest ethical standards.

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

2010-2011 objective

Completion of the whistle blowing mechanism for cases of corruption.

2010-2011 result

The mechanism has been notified to the Hellenic Data Protection Authority for approval.

Degree of success

-

► 2011-2012 objective

Completion of the whistle blowing mechanism for 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 organisations.
9. **Health and Safety.** We are committed to the health and safety of our customers, employees and the communities in which we operate.

10. **Business Partners and Suppliers.** We will pursue mutually beneficial relationships with our business partners and suppliers.
11. **Guidance.** We believe that business life is about employees having the freedom to take decisions, so long as these are consistent with these Principles. However, it is inevitable that there will be occasions where individuals are confronted by situations not covered by precedent or procedure and have to make a decision on the most appropriate course of action. On these occasions when the matter is unclear, any questions or queries should be brought to the attention of the Line Manager.

In addition:

- Vodafone Greece's 5-year strategic plan encompasses the implementation of Corporate Responsibility and Sustainability strategy and relevant programs via long-term and medium-term objectives.
- 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 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, organisation and control of a company. Vodafone Greece attaches particular importance to Corporate Governance and has developed a set of principles and rules to ensure that the company operates in a transparent manner and to ensure that the company is managed in line with the interests of all stakeholders. 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 organised as a corporate body electing its Chairman and Vice Chairman. The Board of Directors may elect one Managing Director (Chief Executive Officer), only among its members, determining at the same time their authority. The capacity of the Chairman or the Vice Chairman can coexist in the same Director with the one of the Managing Director. The Chairman of the Board of Directors conducts the meetings. The Chairman, in his absence or hindrance, is replaced to the full extent of his authority by the Vice Chairman and in case

of hindrance of the latter, following a resolution of the Board of Directors, by the Managing Director, or by any other Member of the Board.

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

The company's Executive Committee has 9 members; the CEO, the COO, the Chief Financial Officer, the Human Resources Director, the Technology Director, the Chief Information Officer, the Consumer Commercial Director, the Business Commercial 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.

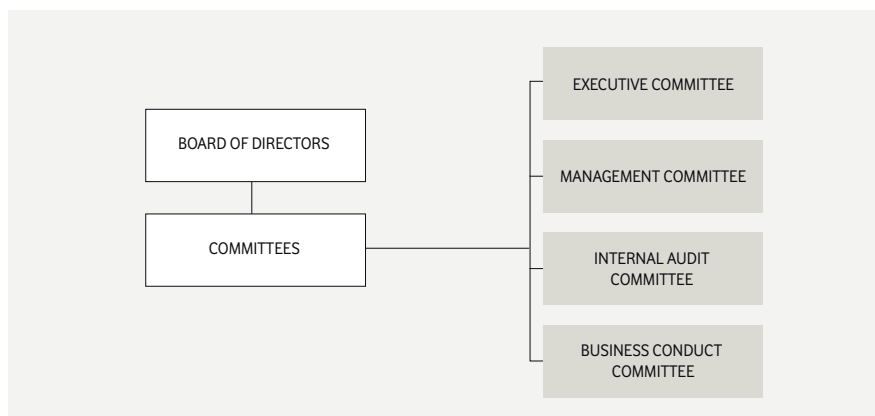
The company's Management Committee has 12 members namely all the 9 members of the Executive Committee and the Head of Legal and Company Secretary, the Corporate Affairs Senior Manager, and the Head of Regulatory and Inter-connection). It meets once a month and there are a total of 12 meetings a year, but extraordinary meetings can also be scheduled if that is considered necessary.

Internal Audit Committee

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

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

1. Reviewing and discussing, with Management and the auditors, preliminary results, results of interim audits and the IFRS-complaint annual financial statements.
2. Reviewing and discussing major accounting issues and reports with Management and the auditors and understanding their impact on the financial statements.
3. Examining the findings of internal and external auditors concerning major weaknesses in the accounting and auditing systems.
4. Reviewing and evaluating the company's general risk management system and the adequacy of its internal audit system, including information and data security.
5. Examining high risk audit issues which have been identified and ensuring that suitable measures are taken to address any weaknesses which appear.



6. Supervising the activities of the company's Internal Audit Department, including reviewing its articles of association, plans, resources, operations, staffing and organisational structure.
7. Monitoring the implementation of and constant compliance with business procedures to ensure compliance with the Vodafone Group's Corporate Governance and Policies Manual, applicable laws and regulations and the company's Code of Conduct.

Business Conduct Committee

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

The Business Conduct Committee is responsible for the following issues:

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

Assessing the impact of our operations

At Vodafone Greece, every two years we carry out a Risk Assessment in the following Corporate Responsibility and Sustainability areas:

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

Risk Assessment includes the following 5 stages:

1. Identification of the direct and indirect impacts that Vodafone Greece's operations may have
2. Study of the relevant legislation, policies, and/or best practice codes, 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. Prioritisation and target-setting for programs the company is obliged to implement to minimise risks.

Identifying our Stakeholders' expectations

In order to recognise 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 Organisations (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 24)

Stakeholders

To better understand the needs and expectations of the society in which we operate, every two years we 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:

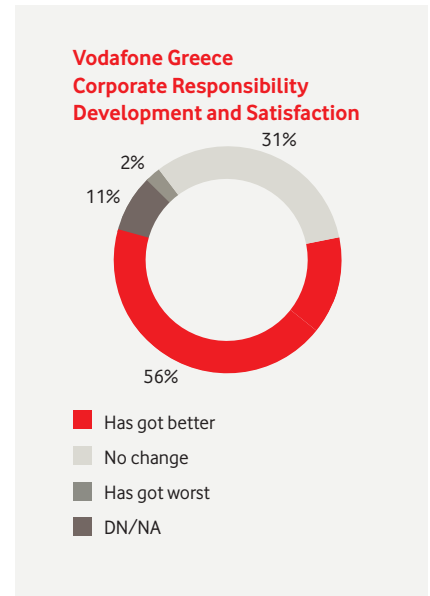
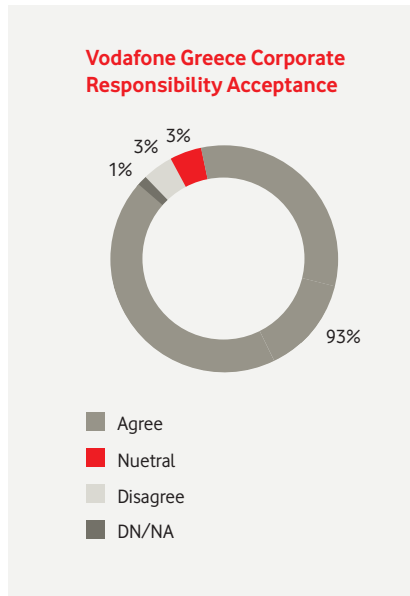
1. Non-Governmental Organisations (NGOs)
2. Government - Local Authorities - Institutions
3. Suppliers
4. Vodafone Shops (Franchises) and other Retail Partners
5. Journalists
6. Academia
7. Business Community – Business Customers

In 2009-2010 we conducted our third Stakeholder Engagement Survey. Some of its main results are set out below:

- ▮ The view of Vodafone Greece's Stakeholders in relation to the company's approach to responsible business and in relation to the sectors in which the company has chosen to operate remained unchanged compared to the 2008 survey. More specifically, 93% agreed with the company's definition of Corporate Responsibility and to a large extent with the sectors in which it has chosen to operate in that field.

- Stakeholders were particularly interested in the following sectors in which Vodafone Greece operates:

 - Environment.
 - Mobile Phones – Masts – Health – Network Deployment.
 - Social Investment.
- More than 5 out of 10 Stakeholders of Vodafone Greece considered that compared to 2-3 years ago the company's Corporate Responsibility has improved. However, 3 out of 10 claim that it has remained the same. Compared to the 2008 survey, there has been an 11% shift from the view 'it has improved' towards the view 'it has remained the same'.
- The overall evaluation of Vodafone Greece's Corporate Responsibility by Stakeholders places it among the companies that are systematically and seriously involved with their Responsibility issues. More specifically, 43% of Vodafone Greece's Stakeholders considered that it had remained in the same position compared to other companies (up by 9% compared to 2008). 21% of Stakeholders place it in a better position while the percentage of Stakeholders who avoided assigning a placement remained significant at 27%.
- Vodafone Greece has been strongly promoting its Corporate Responsibility strategy to Stakeholder groups, given that 7 out of 10 of them commented positively on the company's Corporate Responsibility activities (irrespective of whether asked or whether this statement was spontaneous).
- Vodafone Greece's Stakeholders were asked to what extent they agreed with a series of issues that concern their dealings with the company on Corporate Responsibility issues. Vodafone Greece is encouraged by the fact that whether taken overall or per group, the stance of Stakeholders was particularly encouraging on all issues.



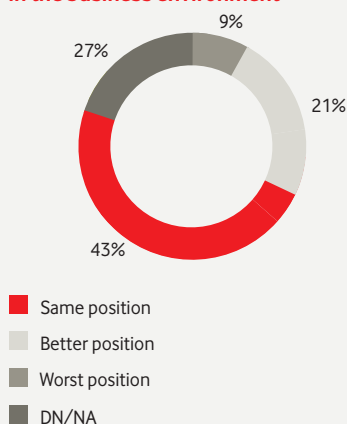
- Stakeholders remained firm in the view that Vodafone Greece provides a good level of information about Corporate Responsibility issues. The percentage of Stakeholders who took the view that the information received from the company in this sector is limited also remained unchanged. In general, they asked that Vodafone Greece do something more in terms of the amount of information provided. More flexible, tailored methods of providing information based on degree of involvement, information needs and preferences and special interests are required.
- A significant section of almost all groups of Vodafone Greece's Stakeholders continue to have unwavering trust in the company. More specifically, 87% of Vodafone Greece's stakeholders said they trusted the company and compared to 2008 its image in relation to the transparency of in-house and external procedures has improved.

General Public

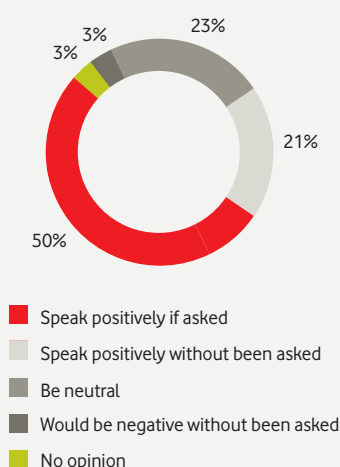
Moreover, at Vodafone Greece we conduct a systematic nationwide survey of a representative sample of the general public investigating consumer perceptions of company's brand image. This survey reflects the degree to which the general public considers Vodafone Greece is a company that operates responsibly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

Moreover, we 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 4th place (compared to 5th place last year) in the Corporate Responsibility index which is comprised of companies which are examined in terms of the recognisability, popularity and penetration of their Corporate Responsibility activities.

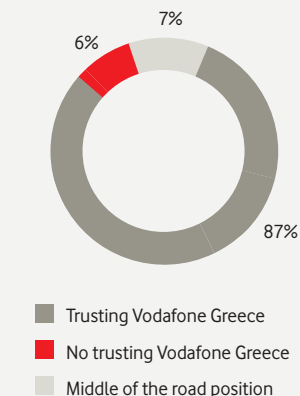
Vodafone Greece Corporate Responsibility position in the business environment



Vodafone Greece Corporate Responsibility Promotion



Trusting Vodafone Greece



General Public / Employees

One of the Vodafone Group's objectives for 2008-2009 was to be recognised as a 'green' company by all audiences and not only by specialists in sustainable development issues. In order to achieve such recognition, specific initiatives have to be taken by the company to that end, which must have a direct repercussion on the customer or general public. In this context the Green Brand Workshops were held, involving the public and employees at local Vodafone Group companies, including Vodafone Greece, to allow us to understand and identify the special features of a company that is perceived as 'green' by specific audiences.

According to this survey 'green' companies have the following features:

- they stand out for their innovative products and services

- they offer environmentally-friendly products and services (such as those made from recycled materials)
- they offer products and services that contribute to energy savings when in use (such as products or services that use significantly less energy than conventional ones)
- their profile is that of a responsible corporate citizen in general (in their dealings with employees, the local community in which they operate, etc.).

Based on the results of the specific survey, Vodafone Greece continued to develop and sell environmentally-friendly products and services and highlighted the environmental features of the services it offers (see pages 60, 63-64).

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 repeated. According to the results of the Employee Survey:

- In the mind of our employees, Vodafone Greece is closely associated with the concept of corporate responsibility and is a leader in this sector. More specifically, 96% of employees believe that the company behaves responsibly towards the environment, 97% believe that the company supports charities and good purposes and 79% believe that the company supports local communities to a large degree.

- ▮ The Corporate Responsibility and Social Investment programs had a positive impact on employee views about the company (93%). A major role in them developing such positive perceptions about the company was played by internal communication and in particular, 80% of employees feel proud to work for Vodafone Greece, while 76% feel that they are working in a company that makes a difference.
- ▮ For our employee's the environment is the most important area in which the company takes actions (89%). The mobile phone and accessories recycling program was particularly well-known (98%) while some 68% of employees participated in the program at least once a year. The highest level of recognition and participation went to the household batteries recycling program (99% and 85% respectively) while the small household devices recycling program was also well-known (91%).
- ▮ The telemedicine program was also considered important by 96% of employees, and the energy efficiency program by 98%, up 6% and 4% respectively from the previous survey.
- ▮ The most recognisable of all social investment programs were the brown bear protection program (99%), the Children's Creativity Workshops at the SOS Children's Villages (98%), the new volunteer World of Difference program (97%) and the Respite Home for children suffering from cerebral palsy was considered particularly important (95%) as was the LETO mobile paediatrics and dentistry unit (93%).

- ▮ A large number of employees (82%) expressed interested in taking part in the social investment programs.
- ▮ 81% of employees said they were pleased with the existing sources of information about masts, mobile phones, technology and health while the company websites (Global intranet and vodafone.gr) were the main source of information for employees about these issues.

Based on the results of this survey, we planned and implemented:

- ▮ information – awareness raising actions for employees about the company's environmental programs (see pages 19, 56).
- ▮ a volunteer program involving company employees (see page 69).

2010-2012 objective

1. Develop an action plan based on survey results.
2. Carry out the 4th Stakeholders Survey (2010-2012).
3. Carry out an Employee Survey.

2010-2011 result

1. The plan was implemented.
2. -
3. An Employee Survey was carried out.

Degree of success

1. 100%
2. -
3. 100%

▶ 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.

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 operations has been certified according to the requirements of the ISO 14001 standard since June 1999 (Certificate No. 04.33.01/006 ELOT). In June 2010 the company's 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 mobile telecommunications company in Greece and the second one worldwide to receive certification under the European Union's EMAS. This system enables us to systematically manage those of our activities which impact on the environment and to provide information to the public through our Environmental Statement (Certificate No. EMAS EL-000011). In May 2006 the EMAS Committee unanimously decided to renew Vodafone Greece's registration in the EMAS Register for Greece. The European Commission has included Vodafone Greece's actions on the official EMAS website as an example of systematic management of the environmental impact arising from company operations.

Vodafone Greece certifications



Vodafone 360

360+5 μέρες το χρόνο
ρυθμίζουμε το κλιματιστικό στους 25°C
το καλοκαίρι και στους 20°C το χειμώνα.



Vodafone CU

See you... στους ειδικούς κάδους
ανακύκλωσης μπαταριών!



Vodafone Cash Back

Η ανακύκλωση χαρτιού και τόνερ
εξοικονομεί ενέργεια και χρήματα!



Vodafone You & Me

Εσύ κι εγώ μπορούμε να συμβάλλουμε
στη μείωση κατανάλωσης ενέργειας.
Ας κλείσουμε τα φώτα φεύγοντας.



**Vodafone
Make your Plan**

Για να κάνουμε σχέδια μέσα σε ένα
καθαρό περιβάλλον ... ανακυκλώνουμε
τους λαμπτήρες εξοικονόμησης ενέργειας.

OHSAS 18001:2007

The Occupational Health and Safety Management System we implement for all our operations has been certified according to the requirements of the ELOT 1801 (OHSAS 18001, BS 8800) standard since June 1999 (Certificate No. 06.33.01/001 ELOT). In June 2010 the company's Occupational Health and Safety Management System was successfully evaluated by the certification body Lloyd's Register Quality Assurance (Certificate No. 3.62212/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 June 2010 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.3.62212/A and 3.62212/B).

ELOT EN ISO/IEC 17025

Vodafone Greece, in March 2009, has pioneered once again within the Greek market, being the first mobile telecommunications company in the country, to obtain certification from Hellenic Accreditation System (ESYD), in line with the requirements of the ELOT EN ISO/IEC 17025 standard, for its Environmental EMF Measurement Lab. The Environmental EMF Measurement

Lab is fully equipped, and is staffed with scientific personnel who carry out radio frequency EMF measurements in line with national and international guidelines and standards, to ensure proper operation of the network and unwavering compliance with EMF exposure limits. The accreditation certificate demonstrates the Lab's problem-free, scientific and reliable work, for which it was audited by the Hellenic Accreditation

System. In July 2009 the Measurement Lab renewed its accreditation, after successfully completed the annual audit performed by the Hellenic Accreditation System (ESYD). In August 2010 we set up a laboratory to measure noise from Base Stations and the ambient – working environment.

ISO 27001:2005 (BS 7799)

In 1999 Vodafone Greece was the first Greek, and one of the first European, mobile telecommunications networks to receive BS 7799 certification for its Information and Data Security Management System, designed to ensure maximum possible security and protection for customer's data and information (BS 7799). In June 2007 the company received certification under ISO 27001:2005, an update to the previous standard, which requires that 133 safety mecha-

Pop-up messages for employees awareness

Vodafone Greece certifications



nisms and organisational measures relating to information security be put in place (LRQA, Certificate No. 362212/F). In June 2010 the re-certification of the Information Security Management System was successfully completed by the certification body Lloyd's Register Quality Assurance with only two improvements made to it.

BS25999-2:2007

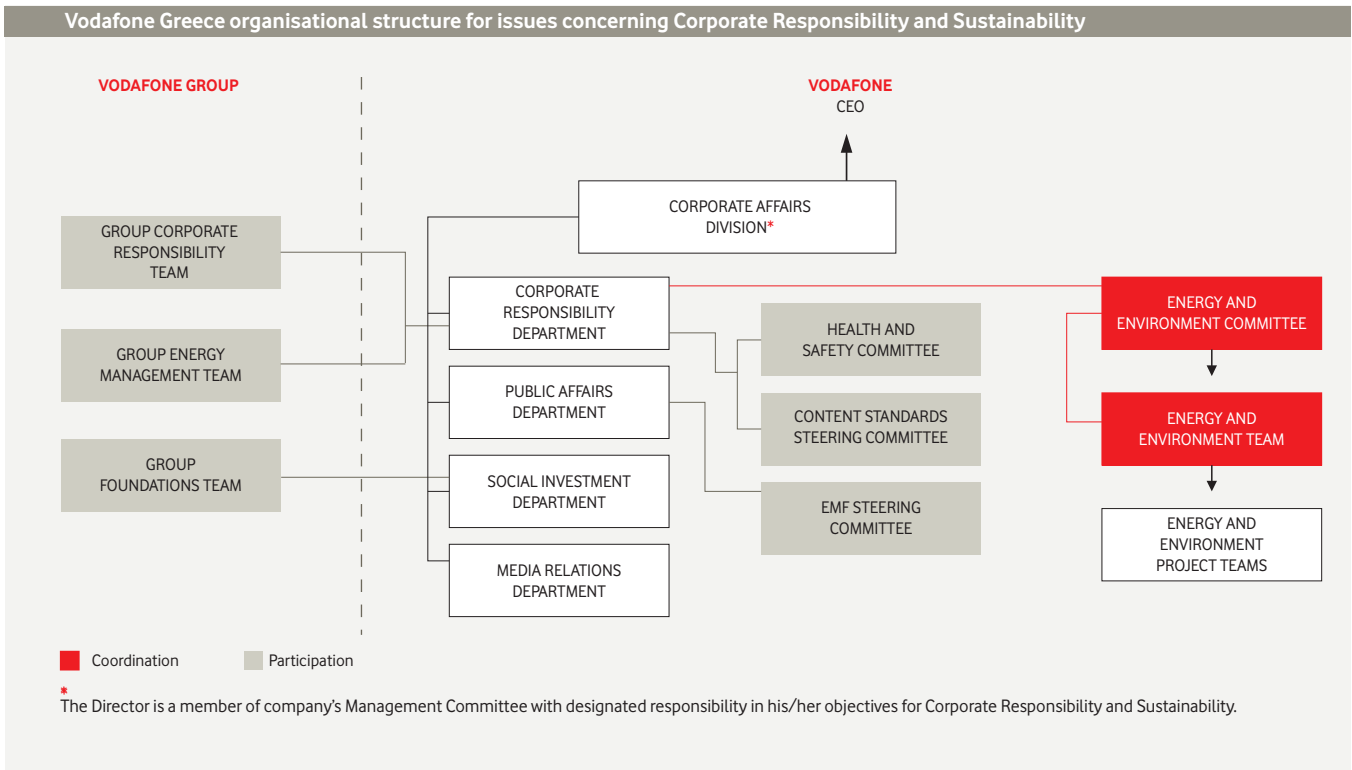
Vodafone Greece's Business Continuity Management System, which applies to the planning, development, implementation, running, maintenance and surveillance of mobile telecommunications networks to provide 2G and 3G voice services, Short Message service, Mobile Broadband services and Customer Service operations, is certified for BS 25999 by the certification body Lloyd's Register Quality Assurance (Certificate No. 362212/H). Vodafone Greece is the first mobile telecommunications company in the country to receive certification under that standard. 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 inspection 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.

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 has lodged an appeal against that decision before the Athens Administrative Court of Appeal which was heard on 24/11/2010. The judgment in that case has not yet been made public.

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 Corporate Responsibility Team and in the Energy Management 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.

Vodafone Greece organisational structure for issues concerning Corporate Responsibility and Sustainability



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

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

The results are collected 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. During 2005-2006, Vodafone Greece verified the implementation of corrective actions already identified and the effectiveness of all internal audits.

2010-2011 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.

2010-2011 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%

► 2011-2012 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 2010, 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 British Standard BS25999,
- ▮ providing training and briefings to all new employees.

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

2010-2011 objective

1. Continue compliance with British Standard 25999.
2. Provide training and briefings to all new employees.

2010-2011 result

1. Successful audit of the Business Continuity Management System in line with British Standard BS 25999 and extension of certification to fixed telephony and internet business customer services.
2. Briefing and training of new employees via the induction program.



Corporate magazine for employees



Degree of success

- 1. 100%
- 2. 100%
- ▶ **2011-2012 objective**

1. Continue compliance with British Standard 25999.
2. Develop a communication and information portal in company's Global Intranet, to raise business continuity awareness.
3. Develop an alternative workplace to be used if the main building facilities are unavailable or inaccessible due to an emergency.

Performing internal audits of our operations

At Vodafone Greece, we operate an Internal Audit Process aimed at improving the business risk management mechanism within the company. This Internal Audit Process is an independent, objective consulting service which assesses the way in which the company operates and recommends optimisation measures, based on corporate governance and audit practices.

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.

Collecting, auditing and publishing data on our operations

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

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

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

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

All information is available in:

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

2010-2011 objective

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

2010-2011 result

1. Successful evaluation.
2. Registration renewal.

Degree of success

- 1. 100%
- 2. 100%
- ▶ **2011-2012 objective**

1. Successful evaluation of Management Systems implementation in line with ISO 14001, EMAS, OHSAS 18001.
2. Internal evaluation of maintaining Vodafone Greece's registration in the EMAS Register for Greece.

1. The 'Hellenic Network for CSR' logo
2. The 'Hellenic Business Ethics Institute' logo



1.



2.

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 organises:

- 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,

2010-2011 objective

Exchange best practices.

2010-2011 result

Best practices exchanged.

Degree of success

100%

► 2011-2012 objective

Exchange best practices.

Membership of international and national organisations

Both, the Vodafone Group and Vodafone Greece are members of international and national organisations 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. In 2010-2011 Vodafone Greece was major sponsor of the activities organised by the Hellenic Network for CSR to mark its 10th anniversary.

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 organisations', 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. During 2010-2011, 6 SMS were sent, primarily with questions about the mobile phones recycling program.

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:

- 16-17 April 2010: 6th Panhellenic Conference of the Local Government Authority Inter-Municipal Health & Social Solidarity Network on 'NHS Health Care & Prevention via Municipalities'.

Mrs Nafsika Zevgoli, Vodafone Greece
Corporate Responsibility Professional,
at the 8th Corporate Social Responsibility
Conference by the Hellenic-American
Chamber of Commerce



- May 2010: Recycling Festival for school pupils at schools in large municipalities nationwide organised by the National Collective Reciprocal Alternative Packaging Management System, TEXAN Reciprocal Recycling.
- 17 May 2010: Green ICTs Info-Event
- 2 June 2010: 8th Corporate Social Responsibility conference on 'Building responsible companies. Best practices for sustainable development, organised by the Hellenic-American Chamber of Commerce.
- 24 June 2010: Telecom Strategies. Digital Cities.
- June 2010: Summer Escape program held at the NOESIS Center
- June 2010: Panhellenic Basketball Camp organised by the Kids Basketball Academy.
- 21 - 29 August 2010: 4th Panhellenic Scout of Greece Jamboree.
- 20 October 2010: The Economist Green Business Summit.
- 1 November 2010: "Eco-Summit, Athens. Green Telecoms: Creating new business opportunities for Greece" organised by Nokia Siemens Networks.
- 8 December 2010: "Future Leaders" organised by the Hay Group.
- 28 February 2011: "Doing Business Socially 2011: Responsibility – Cooperation – Prospects" organised by the Hellenic Network for CSR.

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, 33 articles and 3 print inserts in the corporate magazine 'joy',
- presentation of the results of our programs, prevailing global trends, and examples of best practices from other organisations on the company's Global Intranet,
- distribution of the Vodafone Corporate Responsibility 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,
- sending an email to all via the company's customised electronic bulletin board.

2010-2011 objective

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

2010-2011 result

1. Continuation of the print campaign about the 'mobile phones recycling program'.
2. Information dissemination – awareness raising measures implemented.

Degree of success

1. 100%
2. 100%

► 2011-2012 objective

1. Continuation of the print campaign about the 'mobile phones recycling program'.
2. Information dissemination—awareness raising initiatives implemented 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 - Network Deployment

Responsibly deploying our network

The rapid growth of mobile telecommunications has familiarised 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 organisations 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

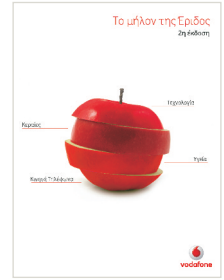
Benchmark figures in the Greek legislation in various frequency ranges calculated using a 70% and 60% reduction in the E-field strength, H-field strength, and equivalent plane wave power density (P). Mobile telecommunications networks operate at frequencies of 900, 1800 and 2100 MHz.

In Greece, the safety exposure limits (basic restrictions and reference levels) for the general public are specified in Article 31(9) and (10) of Law 3431/2006 (Government Gazette 13/A/3.2.2006) on electronic communications and other provisions, and 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%.

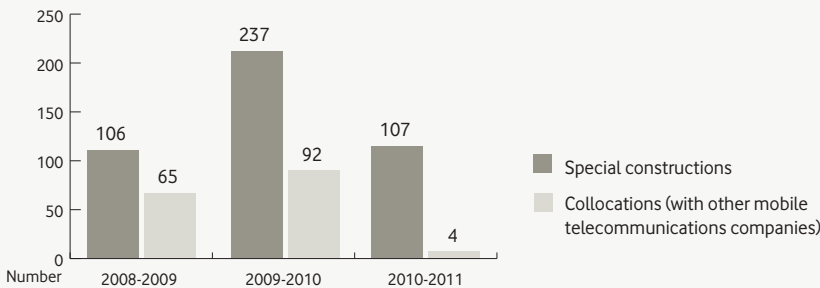
Vodafone Greece's mobile telecommunications network has been designed and installed based on the 60% of the recommended safety exposure limits for the general public irrespectively of whether there exist kindergartens, schools, elderly homes or hospitals within a distance of up to 300 meters from the 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

Region	Average Representative Power Density value [W/m ²]
EASTERN MACEDONIA & THRACE – EPIRUS – WESTERN MACEDONIA REGIONS	0.1009
ATTICA	0.1299
NORTH AEGEAN	0.0815
WESTERN GREECE	0.1031
THESSALY	0.0641
IONIAN ISLANDS	0.0177
CENTRAL MACEDONIA	0.0763
CRETE	0.1299
SOUTH AEGEAN	0.1106
PELOPONNESE	0.0928
MAINLAND GREECE	0.1841



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

Annual special constructions - Collocations



than 164 Weirp) are excluded from the aforementioned requirement. Moreover, the company has the Vodafone ISO/ 17025-certified Environmental EMF 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.

EMF measurements from 13 regions of Greece (which measured power density units, W/m²) are presented in the following table. 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 acting according to Law 3431/2006 as part of their obligations.

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.

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 2010-2011 there were 107 special constructions and 4 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



Environmental impact assessments

Vodafone Greece also conducts environmental impact assessments (EIA) to ensure that any possible environmental impact during Base Station construction and operation is mitigated. However, in 6 cases a fine was imposed on the company (€49,500), due to lack of proper Base Station environmental impact assessments. The company ensures that all Base Stations have the suitable studies required by the legislation. The complex, bureaucratic and time-consuming nature of the Base Station licensing and installation procedures hinders the development of mobile telecommunications and uninterrupted communication between users. More than 15 government departments are involved in the licensing processes while the total amount of time required to obtain the necessary licenses for a Base Station may be as high as 2.5 years. In many cases, there are contradictory demands from the departments responsible for issuing the same license while certain departments stall or refuse to issue licenses, despite the legislation in force, based on arbitrary demands. Unfortunately, the new legislative framework has not resolved the majority of these problems, nor simplified these procedures. Also, the responsible government departments have issued environmental impact assessment approval –a prerequisite for the full licensing of a Base Station– for just approximately 46% of the EIA that the company has submitted.

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.

Informing the public

- During 2010-2011, 6,500 copies of "The Apple of Discord: Technology, antennas, mobile phones, health" were distributed 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, as well as the concise version of it, explain issues such as how mobile phones work, why we need antennas, the

global and national regulatory framework for mobile telecommunications and the views of the World Health Organisation (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 2010-2011 we continued to train 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 2010-2011 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 2010-2010 the NetPolis website received 34,294 hits.

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



Dialogue with Local Communities

We held more than 586 info-meetings with representatives of local government, national and regional media, associations and NGOs.

2010-2011 objective

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

2010-2011 result

Issues were communicated.

Degree of success

100%

► 2011-2012 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. We designed and developed the site owners call center that handles a large number of questions and requests daily, enabling those requests to either be resolved immediately or sent to the competent departments for resolution.

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 2010-2011 in particular, the call center and the relevant company department received around 25,000 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: 2 months
2. Technical and procedural issues: 7.5 days
3. Relations between owners and local communities: Immediate

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.

2010-2011 objective

Vodafone Group network deployment policy incorporation in the contracts of the relevant company's subcontractors.

2010-2011 result

Policy was incorporated.

Degree of success

100%

► 2011-2012 objective

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

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'



Supporting innovative University information programs

'HERMES' Program: 24-hour monitoring of EMF

The 'HERMES' program is an innovative round-the-clock system for measuring and checking radio frequency electromagnetic radiation emitted to the environment from various sources such as radio and television station antennas, mobile telecommunications antennas and radars. The 'HERMES' program is being implemented by the Mobile Radiocommunications Laboratory/National Technical University of Athens and the Radiocommunications Laboratory/Aristotle University of Thessaloniki. In order to improve the program in terms of know-how and to respond to requests for the installation of more measuring stations, the 'HERMES' program worked with the University of Piraeus' Internet and Telecom Systems, Services and Security Lab/Information Technology Department. The University of Piraeus is now the third university after the University of Patra and the Democritus University of Thrace to collaborate with the National Technical University of Athens and the Aristotle University of Thessaloniki, which have overall responsibility for managing the 'HERMES' program. Program technological equipment has been sponsored by Vodafone Greece.

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

In 2010-2011 the program was extended to 13 new locations, with a total of 110 measuring stations in 36 prefectures 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 2010-2011, the Mobile HERMES service took measurements in 2 municipalities (Thermi and Mytilini). Last but not least, in the context of information dissemination activities, the 'HERMES' program participated in 3 events that were organised by local authorities in the municipalities of Thessaloniki, Polygyros and Patra.

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 Hel-

lenic Society for Social Paediatrics and Health Promotion (HSSPHP). Vodafone Greece supports the 'ENIGMA' program.

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

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

In 2010-2011, 7 info-seminars were organised for members of the Medical Association, health educationalists and medical schools. More than 250 people attended the seminars. At the same time, the program was presented to 12 Medical Conferences via an info-stand and relevant brochures were distributed. More than 2,000 brochures were handed out as part of the program.

2010-2011 objective

1. Provide support for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the 'HERMES' program to 20 new locations.
2. Provide support for info-actions for the university programs 'HERMES' and 'ENIGMA'.
3. Provide support to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 5 new areas.

2010-2011 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 13 new locations.
2. Support was provided for info-actions for the university programs 'HERMES' and 'ENIGMA'.
3. Support was provided to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 2 new areas.

Degree of success

1. 65%
2. 100%
3. 40%

► 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.

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.

Listening to our customers' needs

Bearing in mind the conditions in the Greek and international economy and seeking, above all, to meet the needs and expectations of our customers, having launched the new, innovative Vodafone Unlimited prepay and postpay tariff plans in September 2009, in November 2010 Vodafone Greece launched new integrated Vodafone Unlimited Tariff plans offering subscribers even more, and covering all their communication needs. The Vodafone Unlimited tariff plans were designed to liberate communication and offer real economy. In addition all subscribers, by paying a single monthly fee, can have unlimited minutes and SMS to Vodafone mobiles, unlimited minutes to fixed numbers, minutes and SMS to other networks, as well as mobile internet on their mobile phone, and even use their inclusive minutes when abroad.



Moreover, with the new Vodafone Greece Unlimited plans subscribers can use the mobile internet of their bundle when abroad at a small extra fee of just €5/month. The Vodafone Unlimited tariff plans were designed to ensure that the money paid by subscribers is worth it, while also liberating communication in voice and data usage, no matter where they are. Subscribers can choose one of the 11 different tariff plans that start at just € 15 per month. At the same time, in order to give subscribers the ability to have better control over their bills, we also sent subscribers an SMS when they reach 80% and 100% of their minutes to the Vodafone network in line with our fair usage policy.

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

- ▮ Developed new marketing materials which were available via all sales channels, featuring detailed tables and a clear presentation of the plans and the benefits they conferred.
- ▮ Prepared a new price list with itemised charges and disseminated this via all sales channels.
- ▮ Advertised the itemised charges on the company's website.
- ▮ Offered free call or free SMS to 1284 to allow subscribers to learn about how many minutes of airtime they had left for other networks.

We continue to offer our customers the option to choose a discount on their fixed monthly fee rather than a new mobile phone subsidy. The monthly fixed fee discount ranged from €36 to €210 for the year and applied to both new and existing subscribers. Since the annual discount gives subscribers a significant financial benefit, it also gives subscribers an additional incentive to hold on to their mobile phone and thereby reduce the impact on the environment from the number of mobile phones used (which entail the use of natural resources, and the generation of electrical and electronic equipment waste).

We bolstered our strategic partnership with helias online, offering total communication solutions that encompass mobile, fixed telephony and ADSL internet. These new combined solutions were developed to meet consumers' needs for integrated communications at home. All these combined solutions offer financial benefits for consumers both in the form of a discount on both mobile and fixed telephony bills, and in the form of special offers. To advertise these plans we:

- ▮ Developed advertising material available in-shop featuring detailed tables and showing the plans and the advantages of our special offers.
- ▮ Advertised the itemised charges and combined tariff plans on the company's website.
- ▮ Improved customer service points from the sales channels of the 2 companies.

Respecting the need of young users, who have comparatively less income available than other age brackets, we continue to offer unlimited communication for our youth pre-paid plan to Vodafone CU subscribers with free unlimited airtime and SMS per month to all Vodafone numbers (whether pre- or post-pay) with every €10 top-up and to all Vodafone CU numbers with every €5 top-up.

At the same time, in November 2010 we gave CU subscribers the chance to select the extra bonus they wished to receive upon every €5 top-up with a free choice of 100 SMS to all networks or 100 MB for mobile internet. Subscribers were able to make their choice on the new Vodafone CU website (vodafoneCU.gr), reflecting in practical terms Vodafone CU's new motto, "Express the real U". This motto marks the beginning of a campaign to bolster consumer attachment to the brand and was also based on the nature of the product offers where consumers always have the right to select the thing that suits them best.

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 Vodafone numbers (whether pre- or post-pay) 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 '2 hours bonus' scheme that offers 2 free hours of air time to everyone with every €10 top-up for subscribers who need to communicate with all networks.
 3. The Cash Back program that returns 10% to 20% of every top-up every three months.
 4. 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.
- 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 Greece also offers the following plans for the subscribers wishing to connect to the internet even when they are away from home:
1. Vodafone Unlimited with Internet allowance, which combine unlimited voice and SMS communication with surfing the internet from the mobile phone. With these tariffs, subscribers liberate their communication via internet without worrying about increased charges.
 2. Vodafone Mobile Broadband post-pay plans for laptop or tablet which cover all consumers' needs for mobile internet access (volume or time based) as well as the pre-paid service, Vodafone KartolInternet which allows subscribers to access the internet for as long as they need to, without any bills or commitments so that they can better control their costs.
- Vodafone Greece was the first provider in the country to develop the innovative mobile internet services "Vodafone KartolInternet" and "Vodafone Internet All Day" to provide with full control of their costs all subscribers who occasionally connect to the internet via their laptop or tablet and mobile phone respectively.
1. Subscribers who are occasional users of the Internet and wish to be free of contractual obligations, can now go on line via Vodafone's wireless data network for as long as they want to, using Vodafone KartolInternet. There is a number of available pre paid sessions to chose the one that best matches their needs, starting from 30 minutes to 15 days, which allows subscribers to fully control their mobile internet charges since they pay for the time they need to connect to the internet.

2. To allow all subscribers to have immediate, unlimited and fast internet access via their mobile phone, only when they need it, Vodafone Greece launched the innovative "Vodafone Internet All Day" service. Using this new service subscribers can access the internet occasionally, any day they need it, for just €1 per day and unlimited usage.

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 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 made to the company were as follows:

- 7 512 from the EETT
- 7 483 from the Ministry of Development, 5 from the Consumers Institute and 2 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 Multimedia Messaging 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.

2010-2011 objective

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

2010-2011 result

Check conducted (no non-conformities identified).

Degree of success

100%

► 2011-2012 objective

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

Provision of awareness and control mechanisms for internet access

Vodafone MyWeb services menu

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

- 7 We require mandatory age confirmation before allowing access to the specific services.
- 7 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.



"Parents' Guide" leaflet

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.

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.



Mobile phones recycling program print insert

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 categorise content so that content unsuitable for minors is clearly and immediately recognisable, and to prepare info campaigns for parents and children about safe mobile phone usage. At European level, Greece is one of the countries which has already implemented the majority of the provisions in the European Framework.

Informing the public and raising awareness about safe mobile phone and internet usage

Parents' Guide: Mobile - Fixed Communications and Internet

At Vodafone Greece we updated the "Parents' Guide" to include topics covering internet access from mobile phones and computers, how parent's can control access to electronic games, social networking websites, cyberbullying and internet addiction and how it can be addressed.

As a follow on to the first Parents' Guide released in Greece back in 2007, this new Guide has been designed to meet parents' ever-increasing needs for information about the use of mobile and fixed communications and the internet by children.

The new Guide has been prepared in collaboration with two well-respected bodies, the Hellenic Association for the Study of Internet Addiction Disorder and the Hellenic Society for Social Paediatrics and Health Promotion. In its 37 pages, the Guide presents the relevant technology and constantly developing services in this sector in simple language, while specialists also offer useful hints and tips.

2010-2011 objective

1. Update leaflet 'Parents Guide to Mobile Telecommunications'.
2. Implementation of an awareness program regarding safe internet use.

2010-2011 result

1. Leaflet updated
2. Program's implementation was transferred for 2011-2012, due to reconsideration of the activities that will include.

Degree of success

1. 100%
2. -

► 2011-2012 objective

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

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.

2010-2011 objective

Continue to provide information via the aforementioned tools

2010-2011 result

Continued provision of information

Degree of success

100%

► 2011-2012 objective

Continue to provide information.

'Voice Navigation Service'



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.

2010-2011 objective

Inform public about Corporate Responsibility and Sustainability issues via articles.

2010-2011 result

Public was informed.

Degree of success

100%

► 2011-2012 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.

2010-2011 objective

Maintain current products and services.

2010-2011 result

Current products and services maintained.

Degree of success

100%

► 2011-2012 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 2011 the service had been activated for more than 1,000 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 mobile 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.

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 2010-2011, the Customer Service Department received more than 25 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 optimise use of the website's voice portal which can be accessed by dialling 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 it has received more than 72,000 visits to the website and more than 2,000 calls a month (with an average reading time of 30 minutes per call) between May 2007, when the hub officially opened, and 31 March 2011. 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.

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



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 specialised 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 2010-2011, the following lines received more than 57,000 calls.

- 1031: OKANA Drug Helpline
- 1147: Hellenic National Transplant Organisation
- 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 2010-2011 more than 3,400,000 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)

In addition, Vodafone Greece supports the common European emergency number 112, in cooperation with the General Secretariat for Civil Protection.

2010-2011 objective

Retain the existing social support lines.

2010-2011 result

Existing social support lines retained

Degree of success

100%

► 2011-2012 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.

2010-2011 objective

Continue the program.

2010-2011 result

Program was continued.

Degree of success

100%

► 2011-2012 objective

Continue the program.

Supply Chain

Applying the Code of Ethical Purchasing and supplier evaluation methods

Further to our collaboration with suppliers and NGOs, drawing on best practices, the Vodafone Group has developed a Code of Ethical Purchasing so as to set social and environmental standards. Vodafone expects all its associates to comply with the Code. In particular, the Code concerns the following issues (for further information, please visit 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

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

In 2008-2009, 17 of the company's main suppliers were asked to fill out an assessment questionnaire on the level of compliance with Ethical Purchasing Code principles. 14 of them responded positively (82% of those asked) and sent back the questionnaire, while the remaining 3 did not complete the questionnaire. According to results from the analysis of questionnaires, the suppliers who took part in the evaluation comply at a rate of 81% with the Code of Ethical Purchasing principles and only just 3 suppliers at a rate of below 50%.

New supplier qualification procedure

Vodafone Greece has developed a special procedure which determines how the company commences collaborations with new suppliers. Any new supplier wishing to collaborate with Vodafone Greece should provide specific information to the company which permits it to carry out a Risk Assessment on issues relating to the Code of Ethical Purchasing. If the company is interested in commencing collaboration with a new supplier, the results of the Risk Assessment will show whether the supplier needs to fill out the Self-Assessment questionnaire or whether on-site inspections of the supplier's facilities should be carried out. Only when these procedures are successfully concluded can the supplier qualify as a potential company supplier. During 2010-2011, 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 2010-2011, we conducted an audit on issues regarding the compliance with the principles of the Code, at 3 of the company's main suppliers.



'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. During 2010-2011, there were no relevant complaints from suppliers or company's employees.

2010-2011 objective

1. Completion of a series of audits at two suppliers who based on 2008-2009 results, were found to be compliant at a rate below 50% with the principles in the Code of Ethical Purchasing.
2. Re-assessment of company's main suppliers in relation to their compliance with the Code of Ethical Purchasing.

2010-2011 result

1. Audit in one of the supplier that was found to be complying with the principles in the Code of Ethical Purchasing at a rate below 50%.
2. The re-assessment of company's main suppliers in relation to their compliance with the Code of Ethical Purchasing was not implemented due to differentiation in the objectives achievement prioritisation.
3. Assessment of 3 main company's suppliers.

Degree of success

1. 50%

2. -

► 2011-2012 objective

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



Employees

Our employees at a glance

In 2010 the company employed 2,232 people (based on the headcount on 31.03.11), 99.14% of whom are employed on the basis of open-ended employment contracts and 0.86% on fixed-term contracts. Moreover, 51.84% of staff are women, 48.16% men and 93.18% 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 utilise 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 labour agreements based on employee skill. We also offer side benefits.

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 recognise and reward innovative ideas and initiatives which seeks to bolster morale and employee dedication to the company.

It is also company policy to tie pay to employee performance in achieving strategic objectives.

Level of education

Ph.D.	1%
Postgraduate studies	21.5%
University degree	21.7%
Technical Education Institutes	15.8%
College	6.5%
Institutes of Vocational Education	17.7%
High School	15.8%

Gender

Women	51.8%
Men	48.2%

Age

Lowest	20
Highest	66
Average	35.01

No. of Employees

2010-2011	2,332
2009-2010	2,572
2008-2009	2,641

Human Resources allocation per Division

Division	Employees number	Percentage
CEO's Office	3	0.13%
COO's office	2	0.09%
Commercial Business	156	6.69%
Commercial Strategy & Planning	7	0.30%
Consumer Commercial	530	22.73%
Corporate Affairs	21	0.90%
Customer Operations	761	32.63%
Finance	179	7.68%
Human Resources	89	3.82%
Information Technology	88	3.77%
Legal	13	0.56%
Regulatory & Interconnection	9	0.39%
Technology	467	20.03%
Vodafone Albania	7	0.3%
Total	2,332	100%

Age

Gender	2010-2011					2009-2010					2008-2009				
	<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	16	639	503	50	1	50	786	463	44	3	89	883	405	37	3
Men	13	491	54	69	10	33	594	519	67	13	40	631	494	47	12
Total	29	1,130	1,043	119	11	83	1,380	982	111	16	129	1,514	899	84	15

New recruits

2010-2011	96
2009-2010	222
2008-2009	307

Turnover*

2010-2011	8.9%
2009-2010	7.13%
2008-2009	12.37%

* 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.

2010-2011

Contract type	Part timers	TEI practice	Full timers	Seasonal	Total
Open-ended	85	0	2,227	0	2,312
Fixed-term	1	0	18	1	20
Total	86	0	2,245	1	2,332

2010-2011

Contract type	Total	%
Open-ended	2,312	99.1%
Fixed-term	20	0,9%
Total	2,332	100%



Vodafone Greece
Headquarters in Attiki

Operating as a team - The Vodafone Way

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

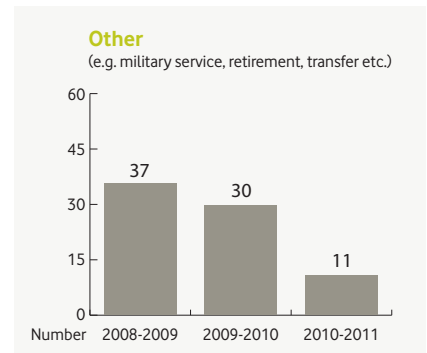
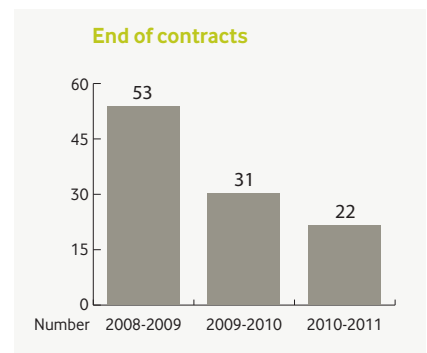
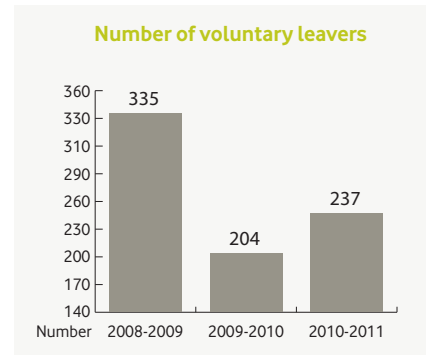
'The Vodafone Way' describes how we should operate and behave towards customers and to each other so that we remain successful in the future. Our goal is for Vodafone to become an admired company. We want our customers to admire us for the experience we offer them, allowing them to communicate freely, 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 do not accept systems and procedures being 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 shareholders, customers and employees without harming society or the environment. 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.



Positions per gender												
	2010-2011				2009-2010				2008-2009			
	Managerial	Staff	Managerial %	Staff %	Managerial	Staff	Managerial %	Staff %	Managerial	Staff	Managerial %	Staff %
Men	114	1,009	82.6%	46%	123	1,103	84.2%	45.5%	122	1,102	84.7%	44.1%
Women	24	1,185	17.4%	54%	23	1,323	15.8%	54.5%	22	1,395	15.3%	55.9%
Total	138	2,194	100%	100%	146	2,426	100%	100%	144	2,497	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 52% of staff and 17.4% of managers are women. Moreover, 2 of the 12 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 labour.



Trade unions and collective bargaining

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'.

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.

The gym in Vodafone Greece Headquarters in Attiki



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

- Accounts, services and commercial policy
- Vodafone Greece Live, 3G, data services
- IT support
- Human resources

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

During 2010-2011 the help desk received 7,958 calls of which 7,433 were answered immediately by help desk staff and only 525 calls were further investigated and handled by the relevant departments.

Sharing our opinion

Direct communication with employees is one of the most important aspects of the Vodafone Greece corporate culture and a way of building stronger relations 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 specialised 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 superiors, 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 is particularly important. It was included for the first time this year. This indicator 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 2010 People Survey, Vodafone Greece achieved a 96.4% participation rate compared to an average of 90% for the Vodafone Group. The level of commitment from Vodafone Greece's employees was 81% compared to 75% for the Vodafone Group, while the effective management index was 79% compared to 73% for the Group. The Employee Net Promoter Score was a remarkable 64% compared to 41% for the Vodafone Group, ranking the Greek company in second place among other European companies in the Group.

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 2010-2011 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 2010 and March 2011 a total of 226 ideas were suggested:

 - 16 of those were implemented and 6 received rewards,
 - 210 possible ideas 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 29 proposals were submitted from April 2010 to March 2011, 5 of which received individual or team rewards. These related to projects of particular importance for the company's objectives and priorities. In the last quarter of 2010-2011, the following Global Heroes awards were conferred:

 - Eleni Kotsara/Consumer Commercial, for exceptional handling of an extremely difficult request from a subscriber.
 - Nikos Kyriakidis/IT and Corentin Daubilly/IT, for delivering, installing and operating an IT initiative during the current year as part of the Customer Decision Technology project.

At the same time, Eleni Kotsara also represented the company at the Vodafone Group event for this program where she won the activity of the year award for 2010-2011.

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 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.

Moreover, the company's training course 'Pelatis' was attended by all employees at company shops. This course was designed in collaboration with the Steering Committee to change behavior and to develop a common culture at the company's shops for both shop owners and employees there.

2010-2011 objective

1. Attendance by 1,800 executives at the 'Pelatis' training program.
2. Continuation of cross-functional projects.
3. Continuation of the recognition programs, 'Make a Difference' and 'The Vodafone Way Global Heroes'.
4. Continuation of targeted training for company executives on Leadership, Innovation and Differentiation issues.

2010-2011 result

1. All employees at company shops attended the 'Pelatis' program.
2. Cross-functional projects were implemented.
3. 6 actions received awards as part of the 'Make a difference' program and 5 as part of 'The Vodafone Way Global Heroes'.
4. Senior executives attended courses on leadership, innovation and differentiation.

Degree of success

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

▶ 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. Attendance by senior executives at diversity training courses.



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 plans 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.

2010-2011 objective

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

2010-2011 result

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

Degree of success

100%

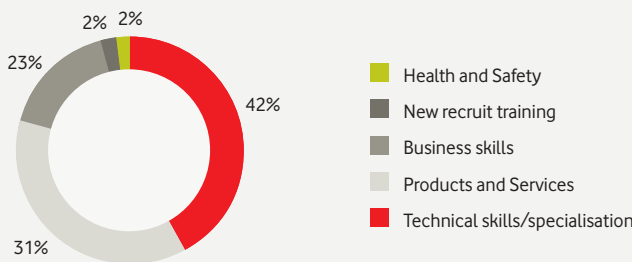
► 2011-2012 objective

Participation of 100% of employees that 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 seminars, interactive activities, e-learning and Vodafone Group courses for anyone who wants to take up a managerial post within the Group elsewhere in the world. The majority of courses are designed exclusively for our company. The company also invests in continuously training its employees by financing part of the cost of degree programs.

During 2010-2011, Vodafone Greece invested around €676,000 in employee training. Employees attended an average of 3 days of training and 70% of employees took part in training courses.

The percentage of training hours per category of training (2010-2011)



Training sectors we focus on are:

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

2010-2011 objective

Continue to bolster and support Vodafone Greece corporate culture by emphasising on 'The Vodafone Way' (e.g. via the program called 'Pelatis').

2010-2011 result

The program implemented was targeted on 'The Vodafone Way' and on customer service, such as the Pelatis program for example implemented at Vodafone shops.

Degree of success

100%

► 2011-2012 objective

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).

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.

'6 Absolute Health and Safety Rules' promotional material



Career options and short-term work experience positions to enable students to acquire experience. The 'Challenger' program was implemented in 2010-2011. As part of this program, we gave 5 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. Two of the five were later recruited by the company. There are already plans to run the program in 2011-2012 under the new name 'Discover'.

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

2010-2011 objective

Implementation of the 'Challenger' program and work experience as part of the program for 6 postgraduate students who will work on cross-functional projects.

2010-2011 result

The Challenger program was run for 5 postgraduate students (for personal reasons 1 participant had to drop out).

Degree of success

84%

► 2011-2012 objective

Continuation of the program as 'Discover' (ex Challenger).

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

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.

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.

Table of accidents

(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	1	0
Uncontrolled work-related accidents (i.e. accidents which occurred one hour before or after working hours away from company facilities) involving company staff	5	11	13
Controlled work-related accidents (i.e. accidents at company facilities) involving company staff	7	2	4

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 recognise positive behaviour 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.

2010-2011 objective

1. No increase in work-related accidents, within workplace, resulting in lost time (from the 2005-2008 baseline), (2008-2011).
2. Evaluation of management executives in relation to achievement of Health and Safety goals.
3. Training for all management executives (around 150 in total) on Health and Safety issues and the 6 Absolute Rules.

2010-2011 result

1. The total number of workplace accidents from 2005 to 2008 was 10, while the figure from 2008 to 2011 was 13.
2. All management executives were evaluated.
3. All management executives were briefed. Special training was provided to management executives operating in high risk areas.

Degree of success

1. 0%
2. 100%
3. 100%



Blood donation program

► **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.

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 *

2010-2011	1,48%
2009-2010	1,76%
2008-2009	1,60%

* 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 (such as information about epidemics like the new flu).

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 organised for employees' children such as a vocational guidance program implemented in collaboration with specialised work psychologists
- ▢ coordinating the participation of children in summer camps all over Greece and providing financial support
- ▢ hosting a children's party once a year for the children of employees at which gifts are distributed.

Implementing a blood donation program

Since 1996 Vodafone Greece has been implementing a blood donation program at the company's premises with the active involvement of employees. This voluntary blood donation program is run twice a year in cooperation with the Athens hospitals, Patissia General and Amalia Fleming, and the Thessaloniki hospital, Agios Pavlos. The resulting blood bank covers the needs of all our people and their close relatives. In 2010-2011, 455 employees took part in the voluntary blood donation program and 227 blood units were used by employees and their families.

2010-2011 objective

Continue the program.

2010-2011 result

Program was continued.

Degree of success

100%

► **2011-2012 objective**

Continue the program.



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 and EMAS certified for all the company activities and facilities.

Eco-Efficiency

Environmental aspects of a mobile telecommunications company's operation

1 Electromagnetic fields

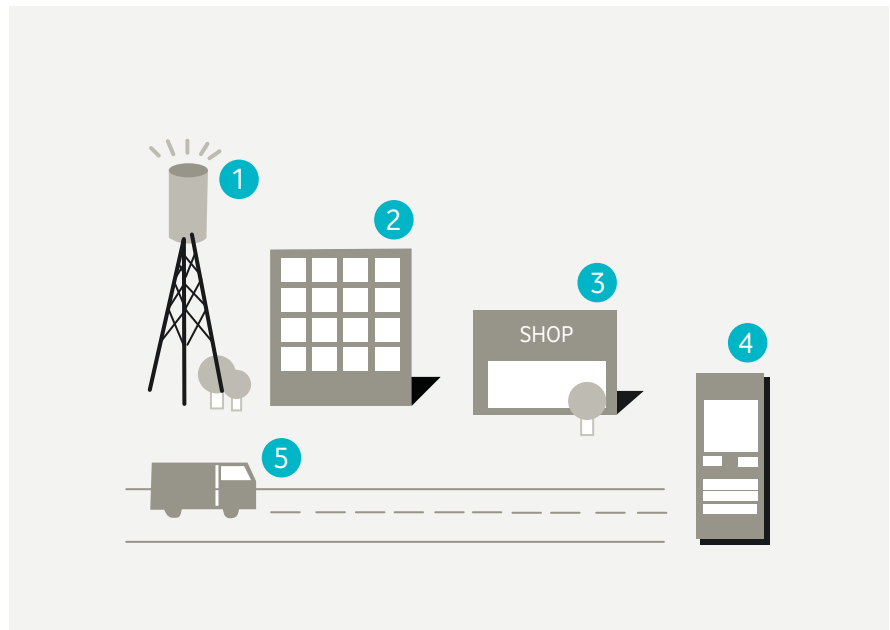
From the operation of the mobile telecommunications network, electromagnetic radio-frequency is transmitted to the environment, thus affecting it. Therefore, the network operation specifications should follow the limits set by international organisations (e.g. International Commission on Non-Ionizing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

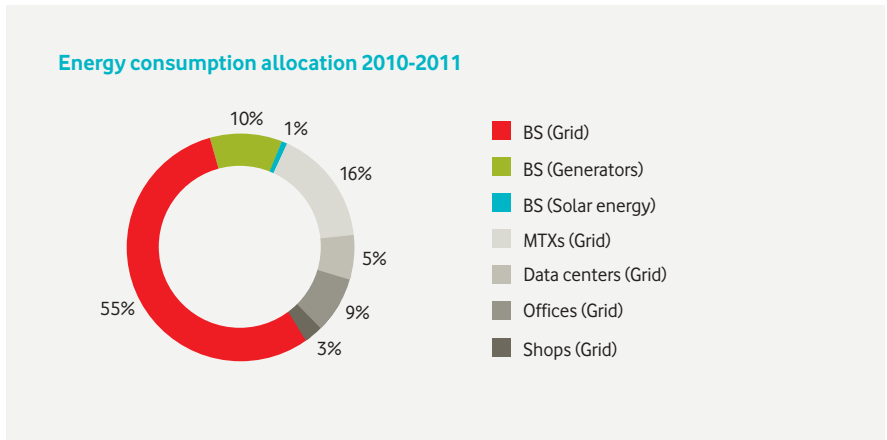
1 Visual Impact

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 to significantly reduce our network's and offices' energy consumption. In 2010-2011 we estimate that we prevented the emission of more than 41,600 tons of CO₂ into the atmosphere via our energy efficiency programs and the use of renewable energy sources at our offices and across our telecommunications network in general. These activities are outlined below. The cost savings from these energy programs implemented by the company are in the order of € 5.6 million, a figure which translates into 0.52% of overall company turnover. Measuring power consumption is a complex process and one that is being constantly reviewed given that there are no commonly accepted standards or examples from other companies to draw on.

* In 2010-2011 the method for calculating energy consumption at company Base Stations was revised and for that reason the consumption figures for the 2 previous years have been adjusted accordingly to ensure that all figures are comparable. This adjustment was made because the increase in consumption from the addition of 3G equipment to Base Stations was re-assessed, consumption figures for outdoor equipment were recomputed and the consumption figures for Bases Stations hosted by other providers were taken into account. Up until now they had not been included in the calculations.



2010-2011 objective

1. Prevent the emission of 29,000 tons of CO₂.
2. Reduce CO₂ emissions by 40% per megabyte (MB) of network traffic (against a 2006-2007 baseline).
3. Reduce, by 2020, CO₂ emissions by 50% against a 2006-2007 baseline (this is a Vodafone Group overall commitment).

2010-2011 result

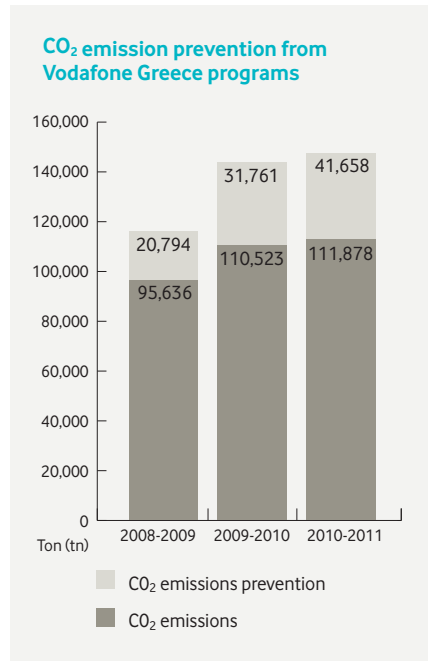
1. The emission of 41,658 tons of CO₂, was prevented.
2. CO₂ emissions reduced by 66% per megabyte (MB) of network traffic against a 2006-2007 baseline.

Degree of success

1. 143%
2. 132%

► 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).





Photovoltaic System in Base Station

Innovating by using renewable energy sources

Green Base Station

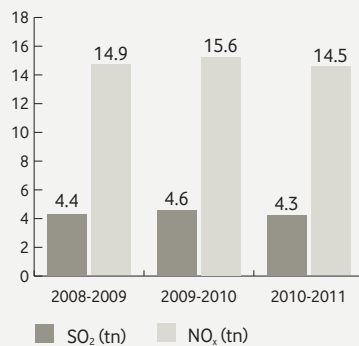
We constructed a pilot 'Green' Base Station which operates exclusively using renewable forms of energy in order to reduce cost and limit the environmental impact from the power generation and consumption requirements of the company's network arising from diesel-fuelled generators. Diesel-fuelled generators participate in a system which combines photovoltaic panels and a wind turbine, in order to cover the Base Station's power requirements. Results have indicated a reduction in diesel-fuelled generator operating time by 95% with a corresponding reduction in environmental impacts (meaning less CO₂ emissions). However, the Base Station trial operation was stopped, since its further deployment in the company's network is not financially viable.

Photovoltaic Systems

At Vodafone Greece we utilise solar energy having installed hybrid photovoltaic systems at 54 Base Stations located in rural areas not covered by the national grid, operating with diesel-fuelled generators. The energy produced by photovoltaic systems is around 0.6% of the total energy used by the network. The use of photovoltaic systems:

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

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



► 2011-2012 objective

Further improve photovoltaic systems by combining them with hybrid systems.

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

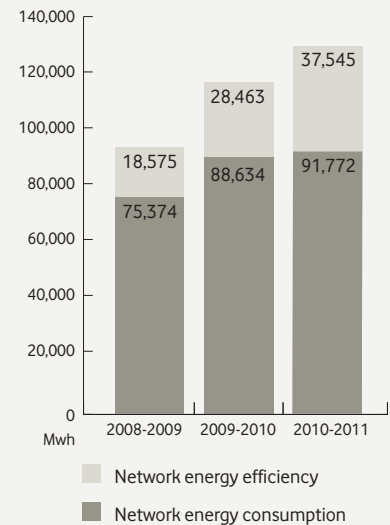
Saving energy across our network*

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.

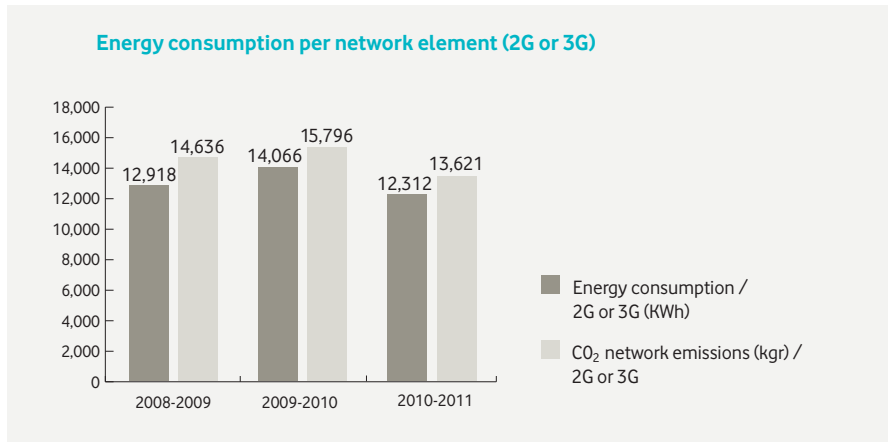
Free cooling systems are installed at all new Base Stations resulting in more than 60% heating and cooling energy savings. Moreover, as part of the network upgrade program, old technology systems are gradually being replaced with new reduced energy consumption technologies.

In the 2010-2011 period 114 'Free Cooling' systems and 96 'inverter' air-conditioners were installed at new Base Stations and 199 conventional air-conditioners were upgraded. As a result of these initiatives, 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 a MTX and Data Center. In 2010-2011 back-up air-conditioners with a total installed capacity of 1,370 KW were kept offline at the company's MTXs and Data Centers with the result that we saved 1.105 MWh, which corresponds to a cost saving in the order of approximately €94,504.



Since 2008, we have increased the preferred cooling temperature special MTX and Data Center facilities from 21°C to 23°C, 25°C or 26°C depending on the requirements of each space, with the result that we made savings of 746 MWh in 2010-2011 which corresponds to a cost saving of around €63,794.

Base Station telecommunications equipment

Given the development of the 3G network and the addition of new Base Stations, an increase in energy consumption per station is expected. 3G equipment is primarily being installed at existing 2G stations with the aim of reducing the overall impact on the environment from the construction of new Base Stations and to make energy savings, since the infrastructure of existing Base Stations can be more efficiently utilised by installing air-conditioners for example.

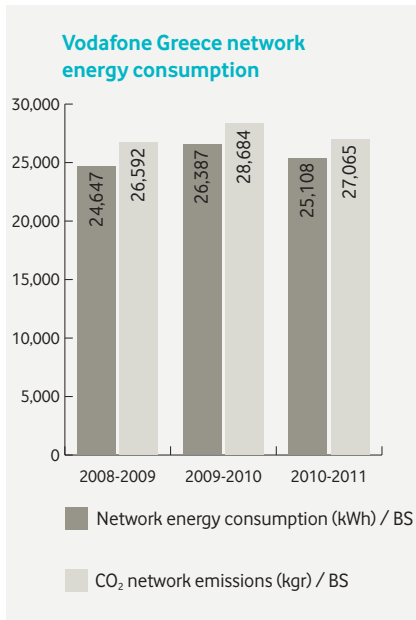
Energy efficiency equipment activation at 2nd generation Base Stations

In 2010-2011 we put in place a mechanism for all 2G Base Stations that monitors the telecommunications traffic at each Base Station in real time and only keeps the TRX needed to cover that specific level of traffic active. Excess TRX are deactivated thereby saving energy. It is estimated that these savings are around 4.5% of total base station energy consumption, while ensuring that the high level of service offered to customers remains unchanged.

* In 2010-2011 we made improvements to how energy consumption at company buildings is measured (relating to specific uses at MTXs, Data Centers and office buildings). This improvement led to the data from the two previous years being adjusted for each use, without the overall energy consumption at buildings being affected.



Free Cooling System



Power generation

Base Stations located in remote rural areas which cannot be connected to the power grid require the use of generators to run the Base Stations. In 2010-2011 we reduced the capacity of existing generators while continuing to ensure that Base Stations remained in operation, accompanied by a 40% reduction in the amount of diesel consumed.

In our endeavor to further reduce the environmental impact from the use of generators, since 2010-2011 we have been using a hybrid system that also uses batteries at around 289 Base Stations, resulting in a 17.5% drop in diesel consumption. During low traffic periods (around 6 hours a day), the generators are 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 the electricity grid are now constructed in this way from the outset. In 2010-2011 this

specific program resulted in savings of 500,000 lt of diesel or 750 MWh of power, and prevented the emission of 1,340 tons of CO₂ to the atmosphere.

2010-2011 objective

1. 31% savings in network energy consumption (this percentage represents energy savings that equals 18,600 MWh for Base Stations and 6,400 MWh for MTXs and Data Centers).

2010-2011 result

1. 41% savings in network energy consumption (this percentage represents energy savings that equals 24,385 MWh for Base Stations and 13,160 MWh for MTXs and Data Centers).
2. Reduction in overall energy consumption at MTXs and Data Centers by 6.6% compared to 2009-2010.

Degree of success

1. 132%

► 2011-2012 objective

45% savings in network energy consumption.



Company Switching Centers (MTXs)

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



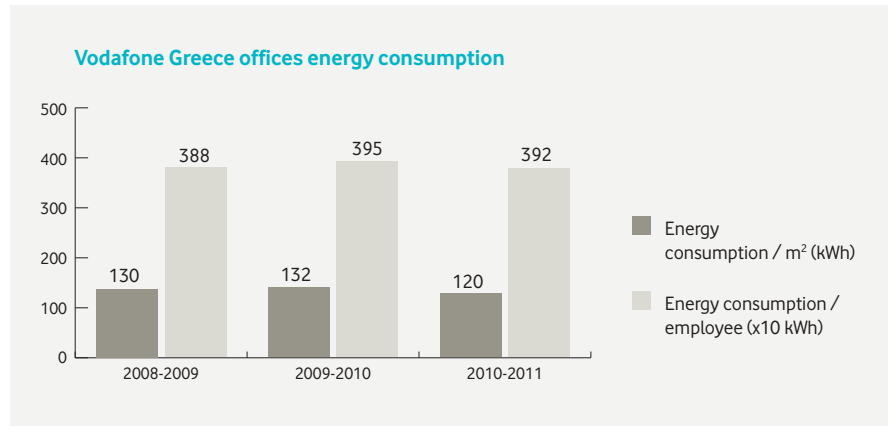
Saving energy at the company's offices

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.

* In 2010-2011 we made improvements to how energy consumption at company buildings is measured (relating to specific uses at MTXs, Data Centers and office buildings). This improvement led to the data from the two previous years being adjusted for each use, without the overall energy consumption at buildings being affected.

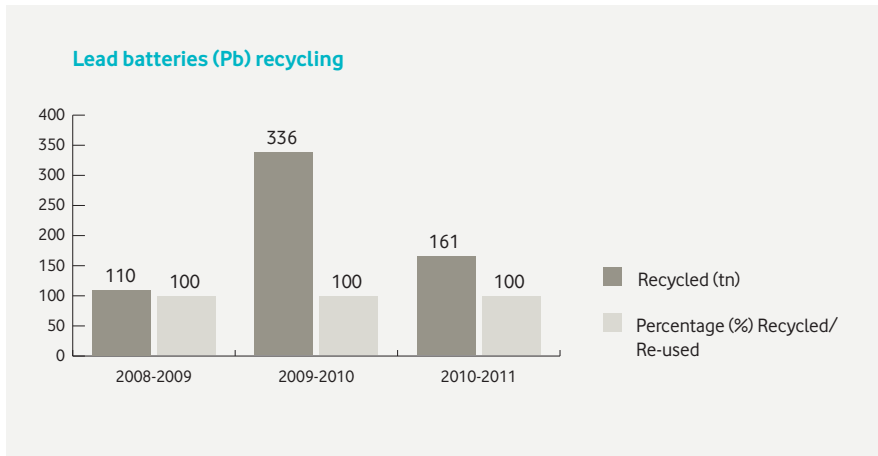


Today this specific practice has been extended to office space covering 44,000 m² including the building complexes in Halandri, Kifissos, Lykovrysi, Pallini, Pireos and Thessaloniki. Energy savings for lighting at the buildings covered exceeded 20%. In 2006, motion detectors were installed in the communal 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.

Idle Power Demand

Since 2004 we have been taking the steps necessary to achieve power factor (cosφ) correction at the company's offices and switching centers (MTX) nationwide. The results of these steps have been that the power factor at offices and switching centers has improved significantly and is now close to unity (1). Significant economic and environmental benefits have been generated. For example, during the 2010-2011 period, it is estimated that cost savings will be around €39,371 while the corresponding reduction in energy consumption will be 6,088 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.

Lead batteries



2010-2011 objective

- 1. 5% reduction in office energy consumption per m².

2010-2011 result

- 1. 9.4% reduction in office energy consumption per m².
- 2. 6.6% reduction in total office energy consumption.

Degree of success

1. 188%

► 2011-2012 objective

5% reduction in office energy consumption per m².

Recycling lead batteries

At Vodafone Greece we promote the recycling of lead batteries used by the company network. In particular, used batteries are sent for recycling to the approved battery and accumulator recycling body. During recycling, lead is recycled with the result that heavy metals are not disposed off to land-fill sites. Over the last two years more than 498 tons of lead batteries have been sent for recycling. The lead from batteries is a substance which bio-accumulates and can, if dumped in the ground, cause long-lasting damage to plants, animals and micro-organisms and therefore to humans via aquifers.

2010-2011 objective

100% recycling of stored lead batteries.

2010-2011 result

100% recycling of stored lead batteries (161 tons).

Degree of success

100%

► 2011-2012 objective

100% recycling of stored lead batteries.

Recycling waste oils

In 2010-2011 36,923 liters of waste oil were sent for recycling. In our endeavor to improve our performance in relation to certified waste oil management, we installed collection tanks at all Base Stations that run using generators (around 800 Base Stations). The project was completed in December 2009. At the same time the company also entered into partnership with an authorised associate who collects the waste oil from those Base Stations.

All waste oils generated at company buildings (MTXs, data centers and office space) is sent for recycling via a certified waste oil associate.

2010-2011 objective

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

2010-2011 result

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

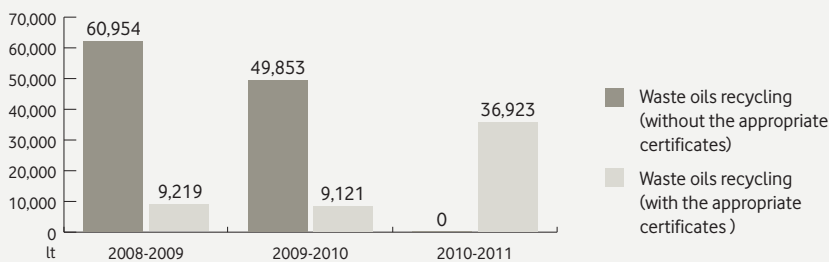
Degree of success

100%

► 2011-2012 objective

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

Waste oils recycling



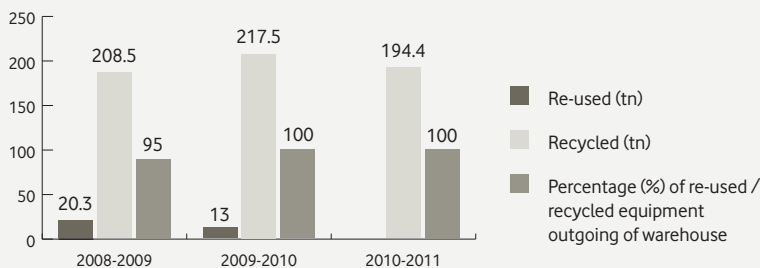
Recycling electrical and electronic equipment

At Vodafone Greece we forward telecommunications equipment, computers, printers and monitors for recycling, in cooperation with the approved waste electrical and electronic equipment recycling body. In this way we are contributing to a reduction in the environmental impact caused by heavy metals such as lead, zinc and cadmium being leached from handsets in landfill sites. In 2010-2011 we sent 194.4 tons of electrical and electronic equipment (includ-

ing used light bulbs) for recycling, corresponding to 100% of old equipment from the company's network of shops and office space.

The program has included light bulbs recycling since 2008-2009. Special collection bins have been placed in company offices and at MTXs to collect bulbs from building maintenance work and send them for recycling. Collection bins have also been placed at the entrances to our office buildings so that company employees can recycle the lamp bulbs they use at home. In 2010-2011 we sent 9.4 tons of used light bulbs for recycling.

Electrical and electronic equipment recycling



In addition, since 2008-2009 special collection bins have been placed at company's office buildings to collect small household electrical and electronic devices. Company employees now have the choice to recycle small household electronic and electrical devices which they no longer use.

2010-2011 objective

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

2010-2011 result

Recycling of 100% of electrical and electronic equipment leaving our warehouse (194.4 tons).

Degree of success

100%

► 2011-2012 objective

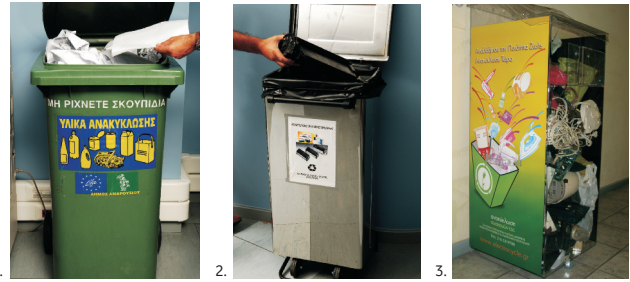
Re-use and recycle 100% of electrical and electronic equipment leaving our warehouse.

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 (in total around 2,200 bins have been placed)
- ▣ toner cartridges collection bins (100 liters) at central locations in the company buildings (such as printing and photocopying areas).

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



During 2010-2011:

- ▣ there was an increase in paper recycling per employee (14%).
- ▣ more than 52 tons of paper (office paper, advertising leaflets, packaging materials) were sent for recycling, saving more than 680 trees
- ▣ 1,680 toner cartridges were sent for recycling, a quantity corresponding to 53% of those purchased by the company, in the same period.

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

2010-2011 objective

1. Maintain paper recycling percentage per employee in line with 2009-2010 result (18.8 kgr per employee).
2. 50% recycling of used toner cartridges.

2010-2011 result

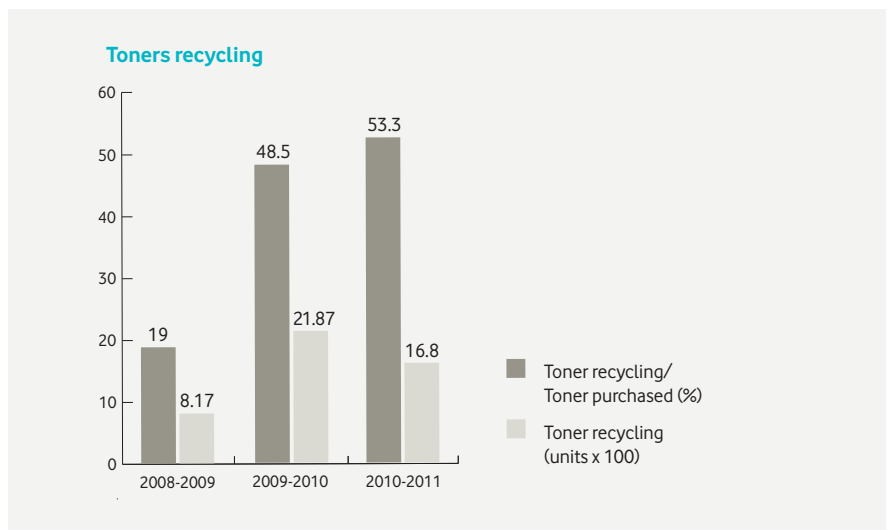
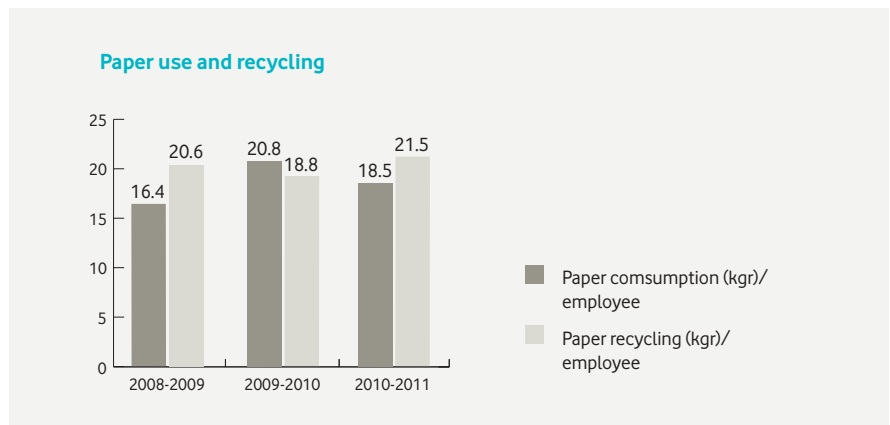
1. 14% increase in paper recycling per employee in comparison to 2009-2010 (21.5 kgr per employee).
2. 53% recycling of used toner cartridges.

Degree of success

1. 114%
2. 106%

► 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.





Mobile phones, accessories and household batteries collection bin

Mobile phones, batteries and accessories recycling program

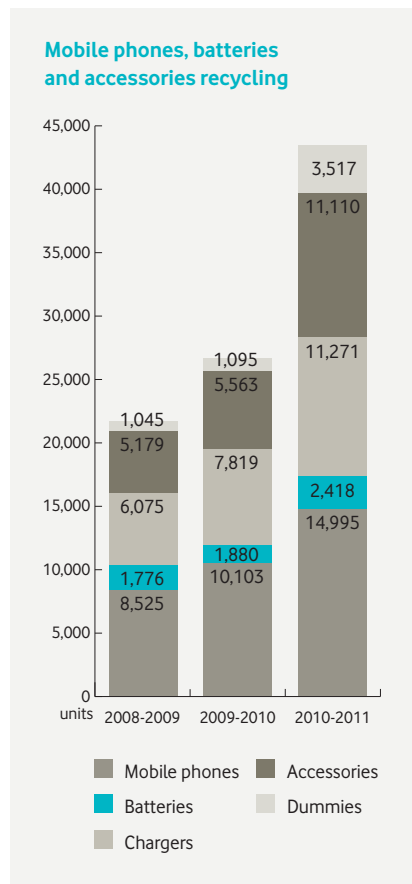
In June 2003 Vodafone Greece was the first mobile telecommunications company to implement a nationwide mobile phones, batteries and accessories recycling program. In 2010-2011 more than 43,000* mobile telecommunications products were collected at around 1,000 special bins that had been installed at Vodafone Greece's shops, at the company's buildings across Greece, at all Scouts branches and in 137 of the company's business customers. It should be noted that all mobile phone owners were able to participate in the program regardless of the network they use.

The company "spring cleaned" its warehouses and more than 83,000 mobile and fixed telecommunications products were sent for recycling.

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

Having collected the materials including spent mobile phones, batteries and accessories, they were sent to a specialised body authorised by the state which under Greek law is responsible for re-use, dismantling or further use of the materials for the production of other items.

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



Although the program is in its 8th year, public participation is not proportionally in line with mobile phone and accessory sales. According to available data, in 2010-2011 only 0.8% of the mobile phones sold by the Vodafone Greece shops during that period were actually collected for recycling at the shops and the company's buildings.

During 2010-2011, we took the following steps to raise awareness among the public:

- In February 2011 employees were once again called upon, with great success, to become ambassadors of the mobile phones recycling program and to inform their friends and families accordingly. As a result, more than 2,215 mobile phones were collected.
- By March 2011, already 137 business customers had installed Vodafone Greece's 178 collection bins at their premises to collect mobile phones and accessories.
- In cooperation with sport clubs such as Olympiacos F.C., P.A.O.K. F.C., Pierikos Archelaos FC., we placed special collection bins at selected areas of their football grounds and also took a series of steps at the grounds to promote the program.
- We were actively involved in the Reciprocal Recycling Fests organised by the National Collective Reciprocal Alternative Packaging Management System 'Reciprocal Recycling' at various municipalities nationwide.
- We continued general public awareness and training regarding the possibilities of recycling a mobile phone materials, through a relevant print insert.

Scouts of Greece 4th Pan-hellenic Scouting Jamboree



In 2010-2011 our shops started an 'Exchange' program to encourage the re-use of mobile phones. 236 mobile phones were collected as part of the program. They were sent to a specialised partner for repair and then for sale in developing countries.

2010-2011 objective

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

2010-2011 result

64% increase in the number of mobile phones and accessories collected (43,311 items collected).

Degree of success

426%

► 2011-2012 objective

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

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

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 for the collection of household batteries (AFIS). During 2010-2011 we forwarded more than 9.8 tons of spent household batteries (around 327,000 batteries).

2010-2011 objective

Collect 8 tons of spent household batteries (around 270,000 batteries).

2010-2011 result

9.8 tons of spent household batteries collected (around 327,000 batteries).

Degree of success

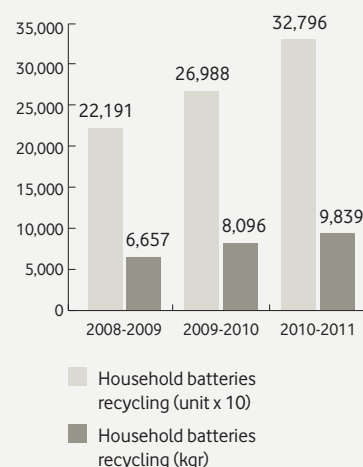
123%

► 2011-2012 objective

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

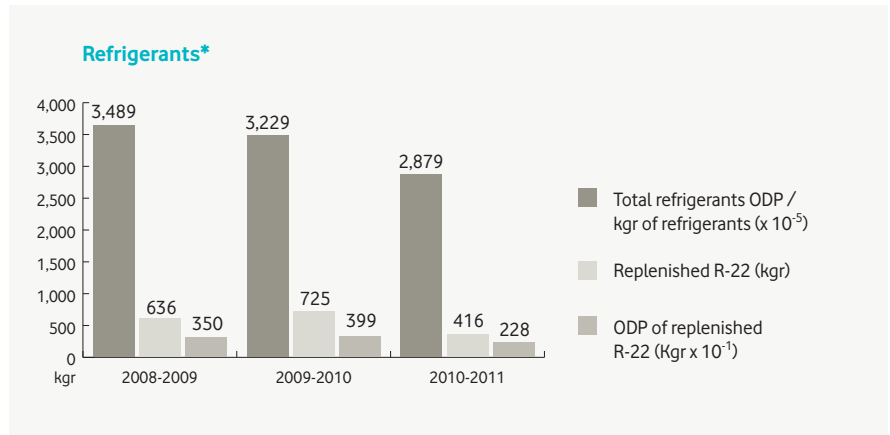
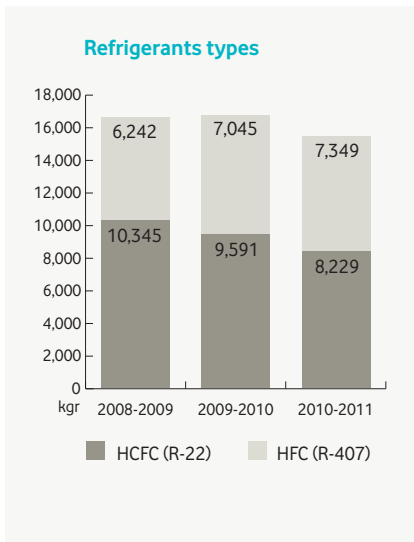


Household batteries recycling



Using more environmentally-friendly refrigerants and fire suppressants

At Vodafone Greece we only use fire suppressants with zero Ozone Depleting Potential (ODP) while as part of scheduled maintenance activities we are gradually replacing old refrigerant systems which operate using HCFC R-22 with new ones which operate with zero ODP refrigerants. In 2010-2011 the installed quantity of HCFC R-22 (a substance contributing to ozone layer depletion) reduced by 14%, while at the same time overall ODP of installed refrigerants also reduced by 11% in comparison to the same period last year. As a result of the efforts taken, the number of breakdowns of refrigerant systems which operate using HCFC R-22 reduced considerably, resulting in a 43% decrease in the quantity of R-22 being replenished.



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

2010-2011 objective

5% reduction in the ODP indicator for refrigerant systems.

2010-2011 result

11% reduction in the ODP indicator for refrigerant systems.

Degree of success

220%

► 2011-2012 objective

5% reduction in the ODP indicator for refrigerant systems.

Reducing paper consumption

At Vodafone Greece we implement a program which seeks to reduce paper use for the company's daily needs. Over recent years the company has modified most of its computer software so that all the employees that use computers in their day-to-day work, can print two or more pages on one sheet of paper. During 2010-2011, paper use (A4 and A3) per employee decreased by 11%.

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. In September 2010 the company completely stopped sending out such bills. The full analysis can instead be viewed online at My Account on vodafone.gr. 90% of company employees participate in this specific program resulting in a saving of 750 kilograms of paper a year, that correspond to approximately 9 trees per year.

Since July 2009, the company stopped sending the full analysis of calls to retail customers, and has achieved a 94.5% participation rate. As a result we saved more than 76 tonnes of paper, corresponding to more than 1,290 trees. In November 2010 the company also extended this e-billing program to business subscribers, achieving a 95% participation rate, resulting in savings of more than 36 tons of paper.

2010-2011 objective

1. Maintain paper use percentage per employee in line with 2009-2010 result (20.8 kgr per employee).
2. Extend e-billing practice to company's business subscribers.

2010-2011 result

1. 11% decrease in paper use percentage per employee in relation to 2009-2010 result (18.5 kgr per employee).
2. e-billing practice extended to business subscribers.

Degree of success

1. 111%
2. 100%

► 2011-2012 objective

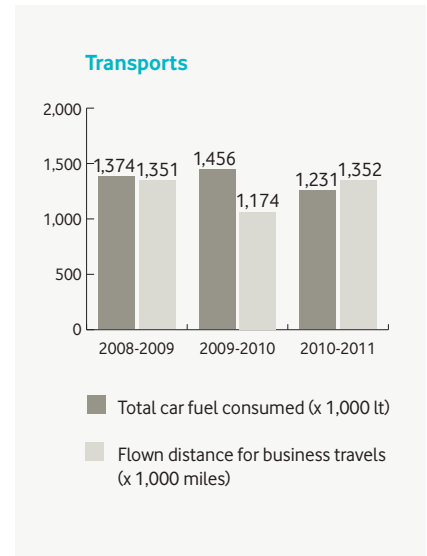
Maintain paper use percentage per employee in line with 2010-2011 result (18.5 kgr per employee).

Monitoring the environmental impacts of transport

Based on available data, fuel consumed by the Vodafone Greece corporate fleet of vehicles dropped by approximately 14% over the last year. At the same time, 830 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 traveled was up 15%*. Since 2008 Vodafone Greece has invested in developing video-conferencing infrastructure to replace the need for its employees to travel by air on business, resulting in a drop in CO₂ emissions from air travel. In 2010-2011 there were 447 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.



2010-2011 result

1. 14% decrease in fuel consumed by the company's vehicles.
2. 15% increase in the air miles traveled.

* This refers to trips abroad, since we have not developed a central mechanism for recording and monitoring trips within Greece.

1. Reciprocal Recycling Fests
2. WWF «Earth Hour» initiative logo



Offering environmentally-friendly products and services

Offering a solar mobile phone

Vodafone Greece was the first mobile telecommunications company in the country to offer the Samsung Blue Earth in February 2010, the first touch screen, environmentally-friendly mobile phone that also recharges using solar energy.

The Samsung Blue Earth combines environmentally-friendly materials, low energy consumption when in use and elegant design as well as unique technical features.

The plastic parts of the handset and the recharger come from reused water bottles which contributes to a drop in fuel consumption and CO₂ emissions during the production process. In 2010-2011 2,136 phones were sold.

Offering a solar mobile phone charger

In 2005 Vodafone was the first mobile telecommunications company in the world to make a solar mobile phone charger commercially available via its shops, and that product was re-released in 2010.

Using sunlight, this innovative product stores energy which is then used to power up the mobile phone whenever necessary thus avoiding the use of electrical power. Vodafone Greece's solar recharger is compatible with a wide range of mobile phones, allowing users to charge mobile phone but keep the same recharger, and can also be used anywhere -even on the beach- provided there is sunlight. It is worth noting that when a conventional charger is plugged in it continues to consume power even if the mobile phone is not connected to it. In 2010-2011, 150 items were sold.

Participating in events to promote environmental responsibility

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

All Vodafone Greece's shops actively participated, for the third consecutive year, in the 'Earth Hour' global initiative organised by the environmental organisation WWF to combat climate change. All Vodafone Greece's shops nationwide turned off their window display lights and store signs for one hour from 20:30 on Saturday, 26 March 2011. 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.

Participating in Environmental Awareness classes

Vodafone Greece was actively involved in the Reciprocal Recycling Fests organised by the National Collective Reciprocal Alternative Packaging Management System 'Reciprocal Recycling' at various municipalities nationwide.

For three weeks from the start of May 2010, students from 11 municipalities across all of Greece took part in major recycling competitions, and recycled more than 2 million pieces of plastic, glass and metal packaging. Note that by recycling that packaging the emission of more than 45,334 kilograms of greenhouse gases into the atmosphere was prevented.



- 1.
- 2.

1. Solar mobile phone
2. Solar charger

During the prize-giving ceremony held at the Aigli in the Zappeion, attended by more than 400 students from municipalities nationwide, Vodafone Greece awarded netbooks and bicycles as prizes to the schools that managed to collect the most recyclable materials in each municipality.

Participating in the 'Recycle Now!' program

At Vodafone Greece we worked with the Thessaloniki First Conurbation Parents Association to design an educational course called 'Recycle Now!'. The program was launched in the 2009-2010 school year and continued in the 2010-2011 school year under the aegis of the Thessaloniki local government authority, in collaboration with officials from the Primary and Secondary Education Directorate of Thessaloniki. The following measures were taken as part of the program:

- A one-day environmental education event was held.
- In 2009-2010, 28 special recycling bins were installed at 24 schools around the city to collect materials such as paper and electrical and electronic equipment while in 2010-2011, 20 new bins were added. At the same time children were given special bags to collect and transport recyclable materials. This result in around 10 tons being sent for recycling, of which 6 tons was paper, 2 tons glass and 2 tons of electrical appliances.

ΠΕ το... στην ανακύκλωση. power to you

Ας συμμετέχουμε όλοι στην προσπάθεια για ένα καθαρότερο περιβάλλον!

Η Vodafone είναι η πρώτη εταιρεία κινητής επικοινωνίας στην Ελλάδα που πήδη από το 2005, ξεκίνησε πρόγραμμα ανακύκλωσης κοπτόν τηλεφώνων, μπαταριών και αξεσουάρ. Το 2009, το πρόγραμμα επεκτάθηκε και στην ανακύκλωση οικιακών μπαταριών.

Από το 2009 το πρόγραμμα καλύπτει και την ανακύκλωση οικιακών σταθερών τηλεφώνων και των σχετικών αξεσουάρ. Φορητών υπολογιστών και mouse. Κάποι συλλογές υπάρχουν σε όλα τα καταστήματα Vodafone πανελλαδικά.

Γιατί να ανακυκλώσω το κινητό και σταθερό μου τηλέφωνο, τις οικιακές μπαταρίες, τους φορητούς υπολογιστές, τα αξεσουάρ κ.λπ. που δεν χρησιμοποιώ πια;

Οι παραπάνω συσκευές αποτελούνται από υλικά, όπως πλαστικό και μέταλλα, ενώ οι οικιακές μπαταρίες περιέχουν στοιχεία, τα οποία αν πεταχτούν στα ρεμπάνια, θα καταλήξουν στον υδροφόρο ορίζοντα (θαμ, στο πόσιμο νερό), επιβαρύνοντας έτσι το περιβάλλον. Για παράδειγμα, στις μπαταρίες νικελίου καθύπου που χρησιμοποιούμε, η ποσότητα του καδμίου που περιέχουν, είναι ικανή να ρυθώνει τα 2,5 του νερού μιας πισίνας, ολυμπιακών διαστάσεων!

Τι αντικείμενα μπορώ να δώσω για ανακύκλωση;

- Οποιαδήποτε κινητό-σταθερό τηλέφωνο και σχετικά αξεσουάρ, όπως φορητός, hands-free, bluetooth, car kit, πρόσδεση.
- Οποιαδήποτε φορητό υπολογιστή, πομπή, router και σχετικά αξεσουάρ.
- Οποιαδήποτε μπαταρία μιας χρήσης ή επαναφορτιζόμενη που φέρει μέχρι και 1.500 γραμμάρια.

Τι συμβαίνει στη συνέχεια με τα αντικείμενα προς ανακύκλωση;

Η Vodafone συνεργάζεται με επίσημους φορείς που εξειδικεύονται στην ανακύκλωση και επαναχρησιμοποίηση τέτοιου είδους υλικών.

Όλα τα αντικείμενα που συγκεντρώνονται, αποσυρμακοποιούνται στα επιμέρους υλικά τους. Στη συνέχεια τα υλικά αυτά χρησιμοποιούνται για την παραγωγή άλλων αντικείμενων (όπως αντικείμενα οικιακής χρήσης, κίβια προβάκια).

Ποιος μπορεί να συμμετέχει στο πρόγραμμα;

Όλοι οι φίλοι του περιβάλλοντος μπορούν να χρησιμοποιούν τους κάδους ανακύκλωσης της Vodafone, ανεξάρτητα από το αν είναι τελείως των καταστημάτων της ή συνδρομητές του δικτύου της.

Για αναλυτικές πληροφορίες μπορείτε να:

- επισκεφτείτε το vodafone.gr
- επισκεφτείτε το πλησιέστερο κατάστημα Vodafone
- στείλετε email στη διεύθυνση CS@vodafone.com
- στείλετε γραπτό μήνυμα SMS στο 1256, χωρίς χρέωση από κινητό Vodafone.

Κάνε το κινητό σου καλύτερα. Ανακύκλωσέ το. power to you

Corporate recycling leaflet

- Info-events were held for around 300 school pupils at the Mavrorachi Landfill Site. The purpose of these visits was to ensure they had a full picture of the benefits of recycling and the impact of not properly managing waste.
- 12,000 copies of an info-leaflet about recycling were printed and distributed.

2010-2011 objective


1. Publish info leaflets.
2. Install additional 20 bins.

2010-2011 result

1. An info-leaflet about recycling was prepared, 12,000 copies of which were distributed.
2. Bins were installed.

Degree of success

1. 100%
2. 100%



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.

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

Carbon Connections study

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 CO₂eq, 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 utilising 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.

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



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.

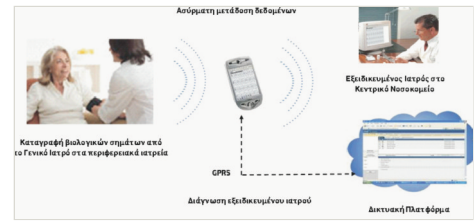
The study was prepared in collaboration with Accenture, and is based on the original Carbon Connections study prepared by the Vodafone Group in collaboration with Accenture, which focuses on implementing smart mobile telecommunications applications in 25 countries in Europe.

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.

Telemedicine program: Process of taking and sending examinations



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
- ▮ optimising itinerary scheduling and reduce the number of kilometers traveled
- ▮ monitoring vehicle usage to schedule preventative maintenance more effectively
- ▮ motivating drivers to implement best driving practices.

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 2010-2011 the program had extended to cover an additional 13 rural surgeries bringing the total figure nationwide to 30. The program, organised and supported by Vodafone Greece, is being implemented in coordination with the Local Government Authority Inter-Municipal Health & Social Solidarity Network, 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.

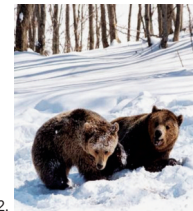
Telemedicine refers to the procedure for obtaining patient examinations from a regional surgery for example and sending them to a central hospital to be examined by specialist doctors such as cardiologists. Telemedicine is based on mobile communication technology and new generation medical devices. These 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 2010-2011 more than 1,709 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.

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



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.

2010-2011 objective

1. Telemedicine program from the 17 current areas to cover 30 in total.
2. Implement a new Telemedicine program.

2010-2011 result

1. Extend the Telemedicine program was extended to 30 locations nationwide.
2. A new telemedicine program was started to monitor type 2 diabetes patients at home.

Degree of success

1. 100%
2. 100%

► 2011-2012 objective

Retain existing telemedicine programs.

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 aimed at secondary school pupils and seeks to highlight local history from the viewpoint of school pupils and to make them more familiar with mobile communications technology as a contemporary tool of education.

As part of the program, pupils were asked to record their local history using 'smart' mobile phones by utilising the camera, video and voice recorder functions. Pupils were asked to contact the local community around their school, explore their town, neighbourhood 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 pupils' 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 pupils' attention. Last, it trains pupils in carrying out a collective project, since they must form groups, in which they need to cooperate closely in order to submit their final project, while it also familiarises 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 on a pilot basis at 6 schools in various areas around Greece.

► 2011-2012 objective

Evaluation of the pilot program and exploration of the potential for extending it to 10 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 signposted for drivers passing through such areas.

2010-2011 objective

Continue and expand the program to cover the Egnatia vertical axis (Siatista – Kastoria – Krystallopigi).

2010-2011 result

Program was continued and expanded to cover the Egnatia vertical axis (Siatista – Kastoria – Krystallopigi).

Degree of success

100%

▶ 2011-2012 objective

Continue the program to monitor the brown bear.

Vodafone World of Difference

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 20 countries with great success, and has given the opportunity to more than 950 individual winners around the world to work for a charitable organisation of their choice. During the 5-week application submission period, we received 292 applications from the public. 3 candidates were eventually chosen to work for one year at a charity of their choice. They were:

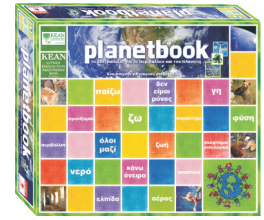
- ▶ Katie Alevra, who took over management of the new Wildlife Care and Environmental Information Center being built by the "ANIMA" Wildlife Protection and Care Association in the Municipality of Saronikos. The aim of the project is to create suitable infrastructure to accommodate and care for 2,500 wild animals a year and to provide environmental education to 7,000 school pupils. The Center will commence operations in September 2011 and in April 2012 it will be possible for schools to make visits to its premises.
- ▶ Konstantinos Kostopoulos, who took up position as Professional Advisor with the Patra Mental Health Association, offering his services to mental health patients and their families. His objective is to assess the state of members of the association and using that assessment to place them in jobs or education and to provide briefings to raise awareness in the local labour market.

- ▶ Vasiliki Hatzopoulou, who took up the post of social worker at the PERPATO Prefecture of Rhodopi Association for the Mobility Challenged, responsible for issues relating to care for the mobility challenged and accessibility in the Prefecture. Her aim is to raise funds and implement specific initiatives to ensure greater accessibility in the Prefecture of Rhodopi for the disabled, as well as to raise public awareness.

We also gave our employees the chance to participate in the program. One employee was chosen to work for 6 months for a charity of his choice. The successful candidate was Ioannis Rhoditis, who took up the post of Business Developer at the Smile of the Child Association for the Southeastern Europe Center for Missing and Exploited Children. His aim is to promote the objectives and activities of the Center among the bodies involved, and to develop partnerships with organisations in neighbouring states in SE Europe.

▶ 2011-2012 objective

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



Planetbook: Environmental board game

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

2010-2011 objective

Distribution of 2,500 games to schools nationwide.

2010-2011 result

2,305 games distributed

Degree of success

92%

► 2011-2012 objective

Presentation of the game at 20 events nationwide.

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 minimise 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.

In October and November 2010, the film was screened at the planetarium at the Science Center and Technology Museum NOESIS in Thessaloniki and was viewed by 4,066 visitors.

2010-2011 objective

20,000 visitors to watch the film.

2010-2011 result

14,087 visitors watched the film.

Degree of success

70%

► 2011-2012 objective

10,000 visitors to watch the film.

'LETO' mobile paediatrics and dentistry unit

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

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

2010-2011 objective

Evaluation of program's continuation.

2010-2011 result

Program continued and 4,268 children were examined.

Degree of success

100%

► 2011-2012 objective

Examine 4,500 children.

1. "LETO" mobile paediatrics and dentistry unit
2. Creative Workshops at the SOS Children's Villages
3. Environmental Educational film 'Earth is our home'



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 theatrical fairytales workshop
- ▮ A new technologies workshop
- ▮ An English language workshop
- ▮ A parent counseling and support group

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 reading and expression workshop

2010-2011 objective

1. Development and running of a new environmental awareness workshop at Vari.
2. Development and running of 3 new workshops at Plagiari: reading and expression, environmental awareness and cultural events.

2010-2011 result

1. New environmental awareness workshop at Vari planned.
2. 2 reading and expression and cultural events workshops developed and run at Plagiari. Environmental awareness workshop planned.

Degree of success

1. -
2. 67%

► 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.

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.

500m² 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.

2010-2011 objective

Accommodate 230 children.

2010-2011 result

274 children were accommodated.

Degree of success

119%

► 2011-2012 objective

Accommodate 270 children.

Supporting initiatives to promote the social good

In February 2006 the three mobile telecommunications companies Cosmote, Wind (former TIM) and Vodafone Greece set up the "Prosfero" 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 organising the charity event (by depositing it with the Deposits and Loans Fund). It is worth noting that

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

2010-2011 objective

Continue the program.

2010-2011 result

1. 9 organisations were supported
2. The program was implemented throughout the year.

Degree of success

100%

► 2011-2012 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. For the second year running, we implemented the 'Me & My Shadow' program for children from the SOS Children's Villages to allow them to get to know how the company works and to receive appropriate stimuli about their professional future. 22 children from the SOS Children's Villages visited our offices in Halandri and Thessaloniki to experience what it is like to be a Vodafone employee for one day. "Me & My Shadow" is a job shadowing initiative intended to contribute to the education of children aged 12 to 16 years old by placing them in the actual day-to-day roles and activities of an employee.

Moreover, a team of employees from the Information Technology and Human Resources Divisions renovated the creativity workshops at the Vari SOS Children's Village. This was a pilot program implemented by 27 company employees who dedicated 362 hours of their working time to studying the premises housing the creativity workshops, designing the renovation and carrying out the necessary work.

For the third consecutive year 10 employees represented Vodafone Greece in the Global Biking Initiative by cycling from Prague to Düsseldorf to disseminate information about the work of the SOS Children's Villages. The team's efforts raised €9,250 in donations from friends, colleagues and the company which went to the Vari SOS Children's Village. This effort also encourage a team of 48 employees and associates of the company to take part in the Athens 28th Classical Marathon in October, raising a total of €14,500 for the Vari SOS Children's Village.

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 2010-2011 around 15 hours were spent in implementing the scheme by a team of employees in the context of their day-to-day work while more than 300 items of clothing were distributed.

2010-2011 objective

1. Continue the program of clothing collection.
2. Repeat the "Me and My Shadow" program.

2010-2011 result

1. The program was continued (clothing collection).
2. The 'Me & My Shadow' initiative took place in Athens and Thessaloniki.

Degree of success

1. 100%
2. 100%

► 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.

Managing Corporate Responsibility and Sustainability		
2010-2011 objective	2010-2011 result	► 2011-2012 objective
<p>Completion of the whistle blowing mechanism for cases of corruption.</p> <p>1. Develop an action plan based on survey results. 2. Carry out the 4th Stakeholders Survey (2010-2012). 3. Carry out an Employee Survey.</p>	<p>The mechanism has been notified to the Hellenic Data Protection Authority for approval. ☉</p> <p>1. The plan was implemented. ☉ 2. - 3. An Employee Survey was carried out. ☉</p>	<p>Completion of the whistle blowing mechanism for cases of corruption.</p> <p>1. Carry out the 4th Stakeholders Survey 2. Develop an action plan based on survey results. 3. Carry out an Employee Survey.</p>
<p>Verify that the relevant corporate processes and mechanisms are properly implemented, thereby assuring the accuracy of company's reported financial results.</p>	<p>Successful assurance of proper implementation and application of corporate processes and control points, including corrective action changes required. ☉</p>	<p>Check proper implementation and application of corporate processes and checks which safeguard: a) the correctness of financial results and b) company revenues.</p>
<p>Obtain validation from independent auditors, who will certify the company's compliance with the requirements of the Sarbanes-Oxley Act.</p>	<p>Validation of company's compliance (comments for improvement were included but these have no impact whatsoever on the financial results) by independent internal and external company auditors, in accordance with the requirements of section 404 of the Sarbanes-Oxley Act. ☉</p>	<p>Successfully obtain validation from independent auditors, who will certify the company's compliance with the requirements of Section 404 of the Sarbanes-Oxley Act.</p>
<p>Continued compliance with BS25999.</p>	<p>Successful audit of the Business Continuity Management System in line with British Standard BS 25999 and extension of certification to fixed telephony and internet business customer services. ☉</p>	<p>Continue compliance with British Standard 25999.</p>
<p>Provision of training and briefings to all new employees.</p>	<p>Briefing and training of new employees via the induction program. ☉</p>	<p>Develop a communication and information portal in company's Global Intranet, to raise business continuity awareness.</p>
<p>Successful evaluation of Management Systems implementation in line with ISO 14001, EMAS, OHSAS 18001.</p>	<p>Successful evaluation. ☉</p>	<p>Develop an alternative workplace to be used if the main building facilities are unavailable or inaccessible due to an emergency.</p>
<p>Renew Vodafone Greece's registration in the EMAS Register for Greece.</p>	<p>Registration renewal. ☉</p>	<p>Successful evaluation of Management Systems implementation in line with ISO 14001, EMAS, OHSAS 18001.</p>
<p>Exchange best practices.</p> <p>1. Continue the Corporate Responsibility print campaign with emphasis on the 'Mobile phones recycling program'. 2. Implement information dissemination-awareness raising initiatives for employees about company environmental programs.</p>	<p>Best practices exchanged. ☉</p> <p>1. Continuation of the print campaign about the 'mobile phones recycling program'. ☉ 2. Information dissemination – awareness raising measures implemented. ☉</p>	<p>Internal evaluation of maintaining Vodafone Greece's registration in the EMAS Register for Greece.</p> <p>Exchange best practices.</p> <p>1. Continuation of the print campaign about the 'mobile phones recycling program'. 2. Information dissemination – awareness raising initiatives implemented for employees about company environmental programs.</p>
<p>☉ Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report)</p>		

Responsible Behaviour

Mobile Phones – Masts – Health – Network Deployment

2010-2011 objective

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

Vodafone Group network deployment policy incorporation in the contracts of the relevant company's subcontractors.

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

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

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

2010-2011 result

Issues were communicated.

Policy was incorporated.

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 13 new locations.

Support was provided for info-actions for the university programs 'HERMES' and 'ENIGMA'.

Support was provided to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 2 new areas.

► 2011-2012 objective

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

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

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.

Customers

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

1. Update leaflet 'Parents Guide to Mobile Telecommunications'.
2. Implementation of an awareness program regarding safe internet use.

Continue to provide information (mobile phones and driving).

Inform public about Corporate Responsibility issues via articles.

Check conducted (no non-conformities identified). ☉

1. Leaflet updated. ☉
2. Program's implementation was transferred for 2011-2012, due to reconsideration of the activities that will include. ☉

Continued provision of information. ☉

Public was informed. ☉

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.

Access to Communications

Maintain current products and services.

Retain the existing social support lines.

Continue the program (academic community).

Current products and services maintained. ☉

Existing social support lines retained. ☉

Program was continued. ☉

Maintain current products and services.

Retain the existing social support lines.

Continue the program (academic community).

Supply Chain

1. Completion of a series of audits at suppliers who based on 2008-2009 results, were found to be compliant at a rate below 50% with the principles in the Code of Ethical Purchasing.
2. Re-assessment of company's main suppliers in relation to their compliance with the Code of Ethical Purchasing.

1. Audit in one of the supplier that was found to be complying with the principles in the Code of Ethical Purchasing at a rate below 50%.
2. The re-assessment of company's main suppliers in relation to their compliance with the Code of Ethical Purchasing was not implemented due to differentiation in the objectives achievement prioritisation.
3. Assessment of 3 main company's suppliers.

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



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

Responsible Behaviour (continue)		
Employees		
<p>2010-2011 objective</p> <ol style="list-style-type: none"> Attendance by 1,800 executives at the 'Pelatis' training program. Continuation of cross-functional projects. Continuation of the recognition programs, 'Make a Difference' and 'The Vodafone Way Global Heroes'. Continuation of targeted training for company executives on Leadership, Innovation and Differentiation issues. <hr/> <p>Participation of 100% of employees that fall under the annual process of 'Performance Dialogue'.</p> <hr/> <p>Continue to bolster and support Vodafone Greece corporate culture by emphasising on 'The Vodafone Way' (e.g. via the program called 'Pelatis').</p> <hr/> <p>Implementation of the 'Challenger' program and work experience as part of the program for 6 postgraduate students who will work on cross-functional projects.</p> <hr/> <ol style="list-style-type: none"> No increase in work-related accidents, within workplace, resulting in lost time from the 2005-2008 baseline (2008-2011). Evaluation of management executives in relation to achievement of Health and Safety goals. Training for all management executives (around 150 in total) on Health and Safety issues and the 6 Absolute Rules. <hr/> <p>Continue the program (blood donation).</p>	<p>2010-2011 result</p> <ol style="list-style-type: none"> All employees at company shops attended the 'Pelatis' program. ☉ Cross-functional projects were implemented. ☉ 6 actions received awards as part of the 'Make a difference' program and 5 as part of 'The Vodafone Way Global Heroes'. ☉ Senior executives attended courses on leadership, innovation and differentiation. ☉ <hr/> <p>100% participation of employees covered by the annual 'Performance Dialogue' process. ☉</p> <hr/> <p>The program implemented was targeted on 'The Vodafone Way' and on customer service, such as the Pelatis program for example implemented at Vodafone shops. ☉</p> <hr/> <p>The Challenger program was run for 5 postgraduate students (for personal reasons 1 participant had to drop out). ☉</p> <hr/> <ol style="list-style-type: none"> The total number of workplace accidents from 2005 to 2008 was 10, while the figure from 2008 to 2011 was 13. ☉ All management executives were evaluated. ☉ All management executives were briefed. Special training was provided to management executives operating in high risk areas. ☉ <hr/> <p>Program was continued. ☉</p>	<p>▶ 2011-2012 objective</p> <ol style="list-style-type: none"> Continued implementation of the 'Pelatis' program, monitoring of results and targeted actions to ensure continuing improvement of the services provided. Continuation of cross-functional projects. Continuation of the recognition programs, 'Make a Difference' and 'The Vodafone Way Global Heroes'. Attendance by senior executives at diversity training courses. <hr/> <p>Participation of 100% of employees that covered by the annual 'Performance Dialogue' process.</p> <hr/> <p>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).</p> <hr/> <p>Continuation of the program as 'Discover' (ex Challenger).</p> <hr/> <ol style="list-style-type: none"> No increase in workplace accidents compared to 2010-2011. Training of Health and Safety at work issues for 70% of employees in the Technology Division. Organise a Health and Safety Week. <hr/> <p>Continue the program.</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

2010-2011 objective

Prevent the emission of 29,000 tons of CO₂.

Reduce CO₂ emissions by 40% per megabyte (MB) of network traffic against 2006-2007 baseline.

Reduce, by 2020, CO₂ emissions by 50% against a 2006-2007 baseline (this is a Vodafone Group overall commitment).



31% savings in network energy consumption (this percentage represents energy savings that equals 18,600 MWh for Base Stations and 6,400 MWh for MTXs and Data Centers).

5% reduction in office energy consumption per m².

100% recycling of stored lead batteries.

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

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

Maintain paper recycling percentage per employee in line with 2009-2010 result (18.8 kgr per employee).

50% recycling of used toner cartridges.

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

Collect 8 tons of spent household batteries (around 270,000 batteries).

5% reduction in the ODP indicator for refrigerant systems.

Maintain paper use percentage per employee in line with 2009-2010 result (20.8 kgr per employee).

2010-2011 result

The emission of 41,658 tons of CO₂ was prevented.

CO₂ emissions reduced by 66% per megabyte (MB) of network traffic against a 2006-2007 baseline.



1. 41% savings in network energy consumption (this percentage represents energy savings that equals 24,385 MWh for Base Stations and 13,160 MWh for MTXs and Data Centers).
2. Reduction in overall energy consumption at MTXs and Data Centers by 6.6% compared to 2009-2010.

1. 9.4% reduction in office energy consumption per m².
2. 6.6% reduction in total office energy consumption.

100% recycling of stored lead batteries (161 tons).

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

Recycling of 100% of electrical and electronic equipment leaving our warehouse (194.4 tons).

14% increase in paper recycling per employee in comparison to 2009-2010 (21.5 kgr per employee).

53% recycling of used toner cartridges.

64% increase in the number of mobile phones and accessories collected (43,311 items collected).

9.8 tons of spent household batteries collected (around 327,000 batteries).

11% reduction in the ODP indicator for refrigerant systems.

11% decrease in paper use percentage per employee in relation to 2009-2010 result (18.5 kgr per employee).

► 2011-2012 objective

Prevent the emission of 45,000 tons of CO₂.



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.

Maintain paper recycling percentage per employee in line with 2010-2011 result (21.5 kgr per employee).

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).



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

Eco-Efficiency (continue)		
<p>2010-2011 objective</p> <p>Extend e-billing practice to company's business subscribers.</p> <p>█</p> <p>Publish info leaflets.</p> <p>Install additional 20 bins.</p>	<p>2010-2011 result</p> <p>e-billing practice extended to business subscribers.</p> <p>1. 14% decrease in fuel consumed by the company's vehicles. 2. 15% increase in the air miles traveled.</p> <p>An info-leaflet about recycling was prepared, 12,000 copies of which were distributed.</p> <p>Bins were installed.</p>	<p>▶ 2011-2012 objective</p> <p>█</p> <p>█</p> <p>█</p> <p>█</p>
Contribution to Sustainable Societies		
Utilising our technology in the health sector		
<p>2010-2011 objective</p> <p>1. Expand Telemedicine program from the 17 current areas to cover 30 in total. 2. Implement a new Telemedicine program.</p>	<p>2010-2011 result</p> <p>1. Extend the Telemedicine program was extended to 30 locations nationwide. ☉ 2. A new telemedicine program was started to monitor type 2 diabetes patients at home. ☉</p>	<p>▶ 2011-2012 objective</p> <p>Retain existing telemedicine programs.</p>
Utilising our technology in the educational sector		
<p>█</p>	<p>█</p>	<p>Evaluation of the pilot program and exploration of the potential for extending it to 10 new areas ('Click ... on history).</p>
Utilising our technology in the environmental protection sector		
<p>Continue and expand the program to cover the Egnatia vertical axis (Siatista – Kastoria – Krystallopigi).</p>	<p>Program to monitor the brown bear was continued and expanded to cover the Egnatia vertical axis (Siatista – Kastoria – Krystallopigi). ☉</p>	<p>Continue the program to monitor the brown bear.</p>
Vodafone World of Difference		
<p>█</p>	<p>█</p>	<p>1. Completion of work by the 4 candidates at the organisations of their choosing. 2. Repeat the program.</p>
Programs for the Children		
<p>Distribution of 2,500 games to schools nationwide (Planetbook).</p> <p>20,000 visitors to watch the film (Earth is our Home).</p> <p>Evaluation of program's continuation (LETO).</p>	<p>2,305 games distributed. ☉</p> <p>14,087 visitors watched the film. ☉</p> <p>Program continued and 4,268 children were examined. ☉</p>	<p>Presentation of the game at 20 events nationwide.</p> <p>10,000 visitors to watch the film.</p> <p>Examine 4,500 children.</p>
<p>☉ Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report)</p>		

Contribution to Sustainable Societies (continue)

2010-2011 objective

1. Development and running of a new environmental awareness workshop at Vari.
2. Development and running of 3 new workshops at Plagiari: reading and expression, environmental awareness and cultural events (SOS Children's Villages).

Accommodate 230 children.

Continue the program.

2010-2011 result

1. New environmental awareness workshop at Vari planned. ☉
2. 2 reading and expression and cultural events workshops developed and run at Plagiari. Environmental awareness workshop planned. ☉

274 children were accommodated. ☉

1. 9 organisations were supported. ☉
2. The program was implemented throughout the year. ☉

▶ 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.

Accommodate 270 children.

Continue the program.

Employees Volunteerism

1. Continue the program of clothing collection.
2. Repeat the "Me and My Shadow" program.

1. The program was continued (clothing collection). ☉
2. The 'Me & My Shadow' initiative took place in Athens and Thessaloniki. ☉

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.

☉

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

Main Figures in Table Form¹

Society - Economy	2010-2011	2009-2010	2008-2009
Turnover (€ million)	1,087.81	1,303.78	1,505.61
Earnings before interest, taxes, depreciation and amortisation (EBITDA) (€ million)	231.9	320.8	484.5
Earnings before taxes (€ million)	-28.7	96.97	237.7
Net sales (€ million)	430.91	535.36	708.2
Total investments in assets (€ million) ²	2,687.76	2,595.95	2,529.64
Cost of goods sold (€ million)	656.9	768.4	797.4
Social - Income distribution	2010-2011	2009-2010	2008-2009
Income tax (€ million)	9.78	39.93	70.38
Value Added Tax (€ million)	123.03	115.97	146.9
Fee of subscribers billing mobile telecommunications (€ million)	112.38	113.93	86.7
Salaried staff social security contributions (€ million)	21.56	22.34	21.5
Total cost of pay rolling and benefits (€ million)	108.05	108.43	112.6
Competition	2010-2011	2009-2010	2008-2009
Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes	⊙ 0	1	3
Responsible Behaviour	2010-2011	2009-2010	2008-2009
Total Vodafone Greece customer base ³	3,875,703	6,023,315	5,906,299
Complaints through EETT	⊙ 512	402	550
Complaints through the Ministry of Development etc.	⊙ 490	511	423
Total number of employees	⊙ 2,332	2,572	2,641
No. of women in first line managerial level	⊙ 2	2	2
Total number of accidents	⊙ 5 uncontrolled & 7 controlled	11 uncontrolled - 2 controlled - 1 fatal accident of a third party	13 uncontrolled - 4 controlled
New recruits	⊙ 96	222	307
Turnover	⊙ 8.9%	7.13%	12.37%
Number of voluntary leavers	⊙ 237	204	335
⊙ Data marked with this symbol is within KPMG's limited assurance scope (see pages 85-87, Assurance Report).			

Eco-Efficiency	2010-2011	2009-2010	2008-2009
Use of renewable energy sources (kWh)	593,627	654,369	593,627
Total network and offices energy consumption (MWh)	104,907	103,000	90,231
Total network and offices energy consumption (Gigajoule)	377,665	370,800	324,831
Total CO ₂ emissions from the company's network and offices (tn)	111,878	110,523	95,636
Total CO ₂ emissions prevention due to the company's programs (tn)	41,658	31,761	20,794
Installed quantity of R-22 refrigerant (kgr)	8,229	9,591	10,345
Replenished quantity of R-22 refrigerant (kgr)	416	725	636
Ozone Depletion Potential (ODP) indicator for refrigerants/kgr (x 10-5)	2,879	3,229	3,489
No. of handsets, accessories, batteries collected as part of the recycling program	43,311	26,460	22,600
Approximately flight distance covered by employees (miles)			
Environmental fines (€)	1,352,593	1,174,098	1,351,087
	49,500	75,250	97,000
Contribution to Sustainable Societies	2010-2011	2009-2010	2008-2009
Programs financial aid (€)	© 409,954	532,051	410,230
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
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 Medical Center www.iatriko.gr
- B**
Blind.gr www.blind.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 Association – The Quality of Life www.ekpizo.gr
Consumers Institute www.newinka.gr
Corporate Social Responsibility Europe www.csreurope.org
- D**
Democritus University of Thrace www.duth.gr/en
Dow Jones Sustainability Index www.sustainability-index.com
- E**
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
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 Federation of Enterprises www.sev.org.gr
Hellenic National Transplant Organisation www.eom.gr
Hellenic Network for Corporate Social Responsibility www.csrhellas.gr
Hellenic Organisation for Standardisation (ELOT) www.elot.gr
Hellenic Ornithological Society www.ornithologiki.gr
Hellenic Police www.astynomia.gr
Hellenic Red Cross www.redcross.gr
Hellenic Society for Social Paediatrics and Health Promotion www.socped.gr
Hellenic Society for the Study of Internet Addiction Disorder www.hasiad.gr
'HERMES' Program for the systematic measurement of EMF www.hermes-program.gr
- I**
Inter Municipality Health & Welfare Network www.ddy.gr
- 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.ypoioan.gr
Ministry of the Environment, Energy and Climate Change www.ypeka.gr
Municipality of Sofades www.sofades
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 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

R

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

S

Science Center and Technology Museum (NOESIS)

www.tmth.edu.gr

Scouts of Greece

www.sep.org.gr

SingularLogic

www.singularlogic.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 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

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

EBENGR Hellenic Business Ethics Institute

EETT National Telecommunications and Post Commission

EIA Environmental impact assessment

EKAB National Center of Instant Help

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

kgr Kilogram

Kwh Kilowatthour

L

LMDS Local Multipoint Distribution Services

LRQA Lloyd's Register Quality Assurance

lt Litre

M

m³ Cubic Metre

m² Square Metre

MBA Master of Business Administration

Mb Megabyte

MMS Multimedia Messaging Service

MTX Switching Center

MWRh Idle Power Megawatt hours

N

NGO Non-Governmental Organisation

O

O.C.R. Optical Character Recognition

ODP Ozone Depleting Potential

OKANA Organisation Against Drugs

P

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)

V

VAT Value Added Service

W

WBSCSD World Business Council for Sustainable Development

-

€ Euro

3G 3rd Generation Telecommunications Network

GRI Relevant Requirements Table

GRI Indicators	Section / Note		Section / Note
Strategy and analysis			Government, commitments and engagement
1.1	CEO Statement	1	4.1
1.2	Key impacts, risks and opportunities	1,2, 4-19, 70-75	4.2
Organisational profile			4.3
2.1	Name of the reporting organisation	2	4.4
2.2	Brands, products and/or services	3	4.5
2.3	Operational structure	4-19	4.6
2.4	Headquarter location	2	4.7
2.5	Countries in operation	2	4.8
2.6	Nature of ownership	2	4.9
2.7	Markets served	3, 76-77	4.10
2.8	Scale of the organisation	3, 76-77	4.11
2.9	Significant organisational changes	3	4.12
2.10	Awards received	3	4.13
Report parameters			4.14
3.1	Reporting period	2	4.15
3.2	Previous report	2	4.16
3.3	Reporting cycle	2	4.17
3.4	Contact point for questions	2	
3.5	Content definition	2, 9-12	Economic performance indicators
3.6	Boundary of the report	2	Disclosure on Management approach
3.7	Limitations on the report's scope	2	EC1
3.8	Joint ventures, subsidiaries and outsourcing	2	EC2
3.9	Data measurement techniques	17	EC3
3.10	Effects of information re-statement	48-53	EC4
3.11	Changes from previous reports	2, 3, 48-53	
3.12	Location of Standard Disclosures	80-83	EC6
3.13	External assurance	3, 17, 85-87	EC7
			EC8
			EC9

GRI Indicators	Section / Note		Section / Note
Environmental performance indicators			Social performance indicators: Labour practices and decent work
Disclosure on Management approach	1, 5-8, 46-61		Disclosure on Management approach
EN1 Volume of materials used	Not material-Vodafone Greece does not manufacture.	LA1 Workforce breakdown	35, 76-77
EN2 Recycled materials	Not material-Vodafone Greece does not manufacture.	LA2 Employee turnover	35
EN3 Direct energy consumption by primary energy source	48-52, 76-77	LA3 Benefits provided to full-time employees	45
EN4 Indirect energy consumption by primary source	48-52, 76-77	LA4 Collective bargaining agreements	35-38
EN5 Energy saved	48-52	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	60	LA6 Workforce in joint health and safety committees	43-45
EN7 Initiatives for reducing indirect energy	59-60, 63-64	LA7 Occupational injuries and absenteeism	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.	LA8 Education on serious diseases	43-45
EN11 Land assets in sensitive areas	Not material-However, Vodafone Greece does assess potential impacts on biodiversity in its network deployment.	LA10 Training per employee	41-42
EN12 Biodiversity within lands owned		LA11 Lifelong learning	41-43
		LA12 Career development	38, 41-42, 76-77
		LA13 Employee diversity and governance	35-38
EN16 Greenhouse gas emissions	48, 76-77	LA14 Basic salary ratio of men to women	Vodafone Greece offers the same pay for the same job irrespective of gender.
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.		
EN18 Initiatives to reduce greenhouse gases	48-49	Social performance indicators: Human rights	
EN19 Ozone-depleting substance emissions	58	Disclosure on Management approach	5-8, 34
EN20 NOx and SOx emissions	49	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.
EN21 Water discharge	Not material based on Risk Assessment results.		
EN22 Waste by disposal method	46-61	HR2 Supplier screening on human rights	34
EN23 Significant spills	No relevant incident occurred.	HR4 Discrimination	38
EN26 Environmental impact mitigation	46-61	HR5 Association and collective bargaining	35-38
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, 31-33, 62-69		Disclosure on Management approach
S01	Impacts on communities	21-26, 31-33, 62-69	PR1	Product life cycle
S02	Corruption risks	5-8, 17, 34	PR3	Product information
S03	Anti-corruption training	5-8, 34	PR6	Marketing communications programs
S04	Actions against corruption	5-8, 34	PR7	Non-compliance in marketing practices
S05	Public policy and lobbying	5-6, http://www.vodafone.com/content/index/about/about_us/policy.html	PR8	Client privacy
S06	Political contributions/donations	5-6, http://www.vodafone.com/content/index/about/about_us/policy.html	PR9	Product non-compliance
S07	Anti-competitive behavior	76-77		
S08	Regulatory non-compliance sanctions	5-8, 12-13, 16, 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	PA2	Overcoming barriers for access and usage
I04	Radiofrequency emissions from handsets	22	PA3	Availability and reliability ensurance
I05	Radiofrequency emissions from base stations	21-26		16-17, http://www.vodafone.gr/portal/client/cms/viewCmsPage.action?pagelId=4341
I06	Specific Absorption Rate of handsets	22	PA4	Level of availability
I07	Sitting of masts and transmission sites	21-24		http://www.vodafone.gr/portal/client/cms/viewCmsPage.action?pagelId=1595
I08	Data for sites	Vodafone Greece characterises this information as confidential. However, the company publishes the number of collocations with other mobile telecommunications companies.		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	
PA6	Emergency situations and disaster relief	16-17, 33	TA1	Resource efficiency of products and services 49-53, 58-60, 63-64
PA7	Human rights issues for access and usage	29-30	TA2	Potential replacement of physical objects 59-60, 63-64
PA8	EMF issues communication	21-26, 31	TA3	Measures of transport and/or resource changes of customer use 60, 63-64, http://www.sepe.gr/files/pdf/Executive%20Summary.pdf
PA9	Investment in electromagnetic field research	22, 24-26, http://www.vodafone.com/content/index/about/sustainability/mpmh/scientific-research/research-programmes.html	TA4	Estimates of the rebound effect 60, 63-64, http://www.sepe.gr/files/pdf/Executive%20Summary.pdf
PA10	Charges and tariffs clarification	26	TA5	Intellectual property rights and open source technologies http://www.vodafone.gr/portal/client/cms/viewCmsPage.action?pagelId=4341
PA11	Information on responsible, efficient and environmentally preferable use	18-19, 24, 29-31, 60, 63-64		

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 reduce the impact of our operations on the environment and society in general, and to bolster the positive impact of our technology on the world around us.

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 Sustainability and the content of the company's Corporate Responsibility and Sustainability Report, so that it follows the principles of the AA1000 APS standard.

One of the constant challenges we face is systematically disseminating the AA1000 APS standard's principles and integrating them into the entire range of company activities. Another priority is to keep Stakeholders constantly briefed and aware, so that consultations with them generate added value for the company, especially when it comes to defining the Corporate Responsibility and Sustainability strategy we follow.

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 con-

cern 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.

One sector that we have invested in strategically is to further utilise our technology to promote sustainable societies in economic, social and environmental terms, and 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. Bolstering technology's contribution in this way is a key challenge which we will continue to address over the years to come.

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 2010-2011 (further referred to as the "Report") for the reporting period ended 31 March 2011.

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):

- the application of AA1000APS (2008)³ principles, as described on page 84 of the Report,
- 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 © and reported in the "Objectives – Results – New Commitments Table" on pages 70-75 of the Report,
- the reliability of performance data for 2010-2011 marked with the symbol © and reported in the "Main Figures in Table Form" section on pages 76-77 of the Report,
- 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.

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 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 and environmental data of the Company contained in the Report.

To obtain a thorough understanding of Vodafone's financial results and financial position, the 2010-2011 audited financial statements should be consulted.

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. Without affecting our conclusion, the following are recommended:

- In relation to the principle of inclusivity, Vodafone's stakeholder engagement could be further improved 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 seek the direct involvement of stakeholders to the materiality and impact assessment by organizing dedicated sessions in the context of regular stakeholder engagement. In this way Vodafone can combine the Company's Management perspective with the direct opinion of stakeholders about the perceived impacts and their materiality.

- ▮ 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 2010-2011 reported in the “Main Figures in Table Form” section on pages 76-77 of the Report, are not fairly stated.

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 page 83 is not fairly stated.

Without prejudice to our conclusions for all the assurance scopes, as presented above, we provide Vodafone’s management with an internal report presenting in more detail our 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, March 9th 2012



vodafone

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