

# Sustainability Report

April 2013 – March 2014



**Vodafone**  
Power to you





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## Letter from the Chairman and CEO

At Vodafone Greece, while operating in a difficult economic environment, and a market full of challenges, we remain focused on implementing our strategy, whose implementation is laying the foundations of sustainability. We continue to improve the services we provide to our customers and stand out from the competition. We are further upgrading our network, our customer care service in all stages of interaction with the customer and keep on leading with innovative products and services. Implementation of our strategy entails investments in infrastructure and technologically ground-breaking services, which in more than 20 years of operation, have exceeded the amount of 3 bn. euros. Moreover, we operate within a framework of agreed principles and values, in line with our company's Code of Conduct, ensuring that our business activity is carried out with integrity, transparency, honesty and objectivity on all levels.

In the framework of our strategic objective to provide integrated communication services, mobile and fixed, in August 2014, Vodafone Greece came into an agreement with Intracom Group and World Equities Investments Holdings SA to acquire 72.7% of their share capital in helias online.

Additionally, following the company's agreement with Wind Hellas, in June 2013, regarding partial common use of their 2G/3G mobile communications network, mainly in the country's rural areas and in certain urban areas, this cooperation was implemented in March 2014 with the creation of VICTUS Networks S.A., a new advanced technology company.

Furthermore, at Vodafone Greece we continue to invest in new technologies, as well as services and products that make the company commercially stand out. We have already launched our 4G network and will keep extending our 4G coverage, whose roll-out is not part of our agreement with Wind Hellas and shall continue to be exclusively provided by Vodafone. We insist on further developing our 3G network by utilising the company's available spectrum through new technologies, such as the UMTS-900, ensuring coverage for our subscribers even in indoor spaces.

For us, at Vodafone Greece, our priority is to explore and develop opportunities that can, through our technology, contribute to sustainability of the Greek economy, businesses, and society as a whole. As a leading services provider for professionals and businesses, we have already developed and made available services and smart applications that allow businesses that implement them to cut down on their operating costs, increase their productivity and competitiveness, while also generating environmental benefits, such as, for instance, services and smart applications, like Vodafone Professional for Hoteliers, Zelitrack and SmartEcometer PV.

True to our commitment, we are particularly proud that our Telemedicine Program was extended to 100 areas nationwide, offering high quality of specialised health care services to more than 500,000 residents of Greece's remote areas, free of charge. Moreover, for the last 10 years, we have been running services with the aim to ensure equal access to communication for all, namely through the Vodafone Speaking App for the visually impaired.

Since the start of our operations, we aim at doing as much as possible for our customers, while consuming as few resources as possible (energy and materials). In this context, we systematically invest in energy efficiency programs and the use of renewable energy sources at the company's offices and our telecommunications network, in recycling programs, as well as the promotion of environmentally friendly products and services.

We are committed to acting responsibly with the aim to build trust relations with our employees, customers, suppliers/partners, and society as a whole. In 2011, we were the first mobile communications provider, which through the "Cost control" service, began informing its entire subscribers' base on their remaining tariff plan usage, thus protecting them from unexpected charges. Also, for the 10th consecutive year, we have implemented the Vodafone bsafeonline program, the most integrated program on responsible use of

mobile phones and safe Internet navigation by children and teenagers alike.

With the aim to meet society's current pressing needs, we are pursuing our collaboration with respected institutions and foundations, such as Medecins du Monde and SOS Children's Villages, to implement programs that fulfill true needs. Accordingly, over the last 5 years, at Vodafone Greece we have emphasised on developing volunteerism, by encouraging our employees and providing incentives so that they may directly contribute to supporting society. In this context, Vodafone Greece employees participate in a series of volunteering actions, devoting their time, skills and dexterities, in order to support the SOS Children's Villages, as well as the Family Support Centers that the SOS Children's Villages have been supporting in 6 cities across Greece. What's more, our company's employees responded immediately and consistently with the aim to offer relief to residents in the earthquake stricken islands of Cephalonia and Ithaca.

The 12th Report presents the programs which we implemented and will continue to develop, our objectives and results achieved in the last financial year, as well as our commitments for the new financial year. For the 10th consecutive year, we are following the Global Reporting Initiative (GRI 3.1) guidelines, to ensure that our results are reported objectively and transparently. In recognition of our endeavour to constantly improve the range and accuracy of information included in the Sustainability Report, we are proud to announce that the content of this year's Report has once again been rated at GRI application A+, and again is compliant with the principles of the AA1000 standard following an audit by an external, independent body.

Glafkos Persianis  
Chairman of the Board of Directors and CEO

## Our mission

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



### Responsible behavior:

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 utilise our technology and offer innovative products and services to support the Greek economy while also generating parallel benefits for the environment and Greek society. At the same time, we are also collaborating with respected institutions and foundations to implement long-term programs that meet the direct contemporary needs of today's society.

Our strategy, as well as the areas in which the multi-faceted Vodafone Greece Sustainability program is focused, are determined according to the Material Issues that pertain the company's operation. Material Issues, as depicted in the following table, result from:

- ▢ The annual impact assessment of the company's operation, products and services (see p. 11-12), through which we identify the issues that affect us and shape our company's present and future.
- ▢ Consultation with Stakeholders (see p. 12-13), with the aim to evaluate their opinion as regards the importance of issues that pertain to our company's operation.

The areas where we focus our activities, in the framework of Sustainability, with systematic actions and measurable results, are the following:

### Responsible behavior

1. Mobile Phones – Base stations – Health – Network Deployment
2. Customers
3. Safe internet use by children and adolescents
4. Supply Chain
5. Employees

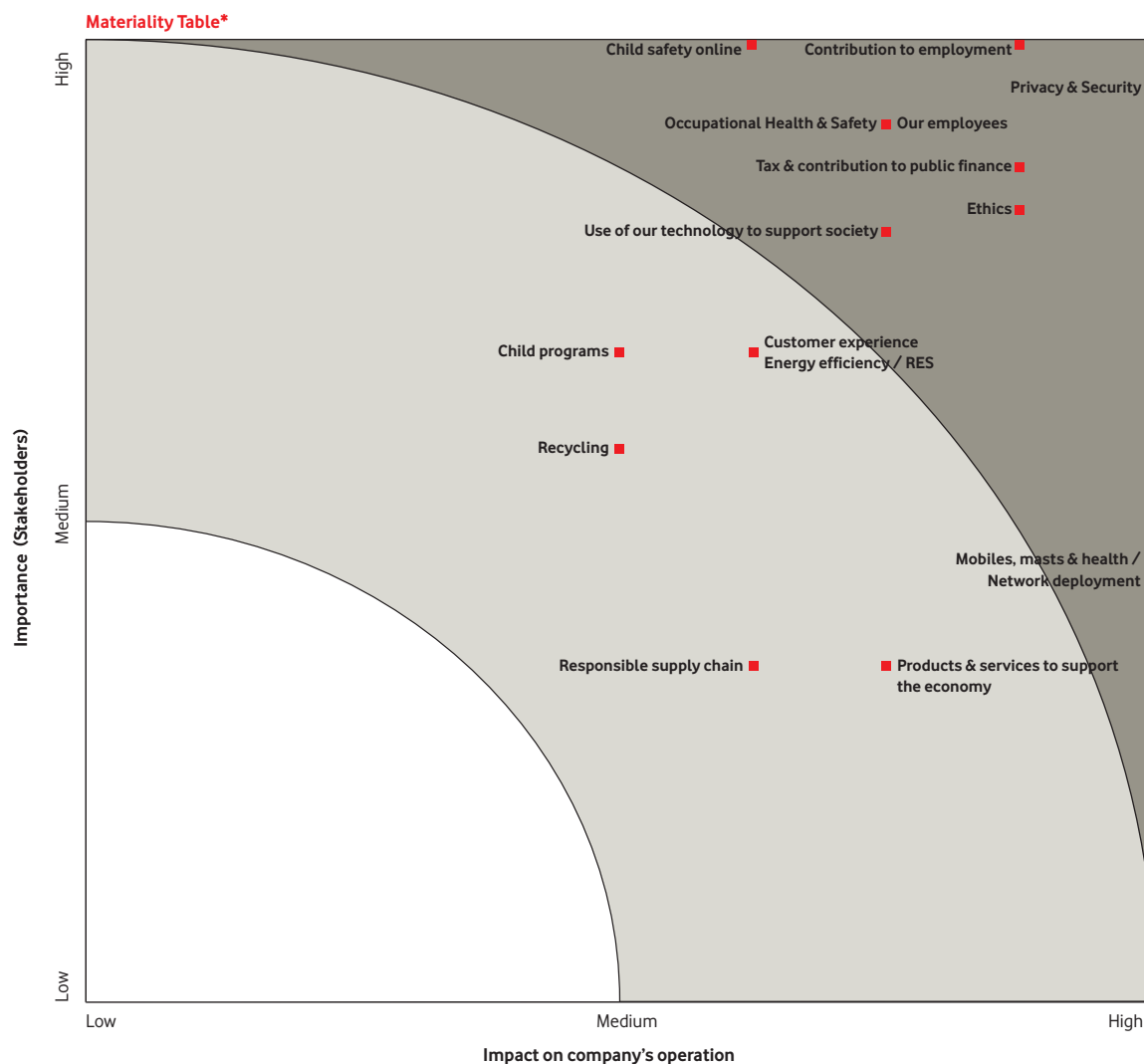
### Eco-efficiency

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. Use of mobile communications technology, products and services for the purpose of:
  - ▢ Supporting the greek economy
  - ▢ Supporting greek society
10. Programs in cooperation with respected institutions that meet the direct contemporary needs of today's society
11. Employees Volunteerism initiatives

Material Issues	Section/page
Contribution to public finance	Message from CEO & Chairman of the Board of Directors (p. 1), Vodafone Greece in numbers (p. 5), Main figures in Table form (p. 80-81)
Contribution to employment	Our employees at a glance (p.39,41), Main figures in Table form (p. 80-81)
Ethics	Responsibility is part of our Business Principles, Strategy and Governance (p. 7-11), Focusing on compliance with Group policies (p. 15), Coming into line with the bribery legislation (p. 17-18)
Mobile phones, base stations and health/network deployment	Mobile phones – Base stations – Health – Network Deployment (p. 21-26)
Privacy and security	Integrating responsibility into our Management systems (p. 13-15)
Employees	Employees (p. 39-47)
Occupational Health & safety	Protecting employee health and safety (p. 45-47)
Responsible Supply chain	Supply chain (p. 36-38)



\* This Table lists Material Issues that describe company's operation. These issues are derived from identification and assessment of the impact of "important" company issues on its operation, combined with the importance attributed to said issues by Stakeholders (based on processing of the Stakeholder Engagement survey results).

Material Issues	Section/page
Child safety online	Safe Internet usage by children and teenagers (p. 34-36)
Customer experience	Clients (p. 26-33)
Energy efficiency / Renewable energy sources	Eco efficiency (p. 50-54)
Recycling	Eco efficiency (p. 55-59)
Products and services that support the economy/businesses	Utilising our technology to boost greek businesses' competitiveness, with parallel benefits for the environment (p. 63-64), Utilising our technology to support the greek economy and local communities (p. 64)
Use of our technology to support society	Utilising our technology for equal access to communication (p. 65-66), Utilising our technology in the areas of health and education (p. 67-68), Supporting initiatives for the common good (p. 68-69)
Child programs	Programs in cooperation with respected institutions that meet direct contemporary needs of today's society (p. 69-73)

This is the 12th Vodafone Greece Sustainability Report which presents the management practices and the results of our actions for the financial year from 1 April 2013 to 31 March 2014 (2013-2013 period).

The information relates to VODAFONE PANAFON S.A. and its operations at its central and regional offices, its telecommunications network and its shops (own and franchise\*) and does not include associates or hellas online.

### Note

- ▮ The term Vodafone Greece refers to the Greek company, while 'Vodafone Group' refers to Vodafone Group Plc which indirectly holds 99.871% of Vodafone Greece's share capital.
- ▮ The 2013-2014 objectives cited in this report were laid down in the Report for the 2012-2013 financial year, which is available on the [vodafone.gr](http://vodafone.gr) website.

### Sources of information

All information included in this publication is also available on the company's website. For more information you can visit the [vodafone.gr](http://vodafone.gr) website.

- ▮ The current Sustainability Report that refers to the financial year 1 April 2013-31 March 2014, as well as all previous Reports are available at [vodafone.gr/Sustainability](http://vodafone.gr/Sustainability).
- ▮ Vodafone Group Sustainability Report is available at [vodafone.com/Sustainability](http://vodafone.com/Sustainability).

### Comments

We welcome your feedback about our activities in the Corporate and Sustainability area and about this publication. Please send your views to:

#### Please send your views to

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### Vodafone Greece Sustainability Report Data Audit

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

\*

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



## Vodafone Group - Vodafone Greece: Key financials and statistics

Vodafone Group	2013-2014 (€ m)	2012-2013 (€ m)
Revenue	38,346	38,041*
Adjusted Operating Profit	8,254	7,580*
Free cash flow	4,183	5,501*
Customers (m)	433.6	403.8

Vodafone Greece	2013-2014 (€ m)	2012-2013 (€ m)
Turnover	708.33	912.02
Earnings before interest, taxes, depreciation and amortization (EBITDA)	158.130	189.80
Earning before taxes	-25.79	-27.57
Net sales	315.39	366.03
Total investment in assets	392.95	545.99
Cost of goods sold	2,893.97	2,877.87

**04/2013** Vodafone Greece and hellas online offer free Internet at Goody's and Flocafe shops across Greece

**05/2013** Vodafone creates the innovative "Personalised service" for all businessmen

**05/2013** Vodafone, in its first participation in the CR Index, The National Corporate Social Responsibility Index, received the "Silver" award for the Sustainability Program it implements, while it also received special praise on its best corporate performance in the "Market" category

**06/2013** Vodafone Greece extends its 4G network, offering incredibly fast speeds to subscribers with smartphones, tablets and laptops

**07/2013** Vodafone Greece received a top international award for its "Vodafone Free 3G Hotspot" service

**07/2013** Vodafone Greece offers lower charges for communication and Internet abroad

**07/2013** Vodafone Greece has commercially launched the Online Top up service

**07/2013** Vodafone Greece is the first in the country and with an exclusivity that cooperates with Napster, the pioneer in global service digital music market

**07/2013** "Mobile for Good Europe Awards" launched by the Vodafone Group to develop applications that can help improve the quality of life helping improve the quality of life and promote sustainable societies

**07/2013** Vodafone launches the innovative "New Smartphone Every year" service

**07/2013** Vodafone innovates and introduces the Eco-rating program for mobile phones

**08/2013** Vodafone Greece offers to all its subscribers unlimited mobile internet, for free

**08/2013** For the 5th consecutive year, Vodafone employees participated, on a volunteer basis, in a cycling journey to support the SOS Children's Villages

**09/2013** Vodafone Greece invites everyone to support the SOS Children's Villages and light up the new school year by collecting school supplies

**09/2013** Vodafone Greece received, for the 4th time in a row, the "Gold Social Environmental Ethical Governance Award", by the Hellenic Business Ethics Network (EBEN GR)

**10/2013** New CU Student Xclusive bundles for students

**10/2013** Vodafone extends the innovative "Personalised service" to small and medium size businesses and professionals

**10/2013** Vodafone received 7 awards (3 Gold and 4 Silver) at the 2013 Social Media Awards

**11/2013** Vodafone is the first and only in Greece to offer the possibility to all its subscribers using its 4G network to enjoy unbelievably fast mobile internet speeds when traveling in Italy, Portugal and Romania using Vodafone's 4G network in these countries

**11/2013** Vodafone Greece received two Corporate Responsibility Excellence Awards, in the framework of the 6th ceremony of the "Corporate Responsibility Excellence Awards" by the Hellenic Advertisers Association, in the "Society" category, for its Telemedicine Program and IN the "Social products and services" category, for the Youth Safe Pack prepay connection package and Vodafone Safety Net application

**12/2013** New important call termination reductions for calls to Vodafone mobile network

**12/2013** This Christmas, Vodafone Greece offers Mobile Internet automatically and totally free of charge to all its subscribers, from the 25th December 2013 to the 1st January 2014

**12/2013** Vodafone receives 17 awards in total (2 Grand, 6 Gold, 5 Silver and 4 Bronze) in the context of the Ermis Awards 2013 by the Greek Association for Advertising and Communication

**01/2014** 3.5 tons of food collected by Vodafone employees for the SOS Children's Villages

**01/2014** Vodafone Greece stands by all of its subscribers living in the earthquake stricken islands of Cephalonia and Ithaca, offering free mobile communication services

**02/2014** A new ground-breaking application Vodafone Speaking App for visually impaired people by Vodafone

**02/2014** Vodafone extends the free communication offer for prepay subscribers living in the islands of Cephalonia and Ithaca, providing free of charge mobile communication services

**02/2014** Alpha Bank and Vodafone Greece innovate and offer for the first time in Greece, the innovative "Tap 'n Pay" application for payments via mobile phones

**03/2014** Vodafone global leader in terms of M2M networks for the third consecutive year

**03/2014** Vodafone Greece is giving all of its subscribers travelling to the United Kingdom the possibility to use its 4G network via roaming and enjoy amazingly fast mobile internet speeds

\* Financials for 2012-2013 were reviewed by Vodafone Group. For more information see Vodafone Group Financial report at [vodafone.com](http://vodafone.com)



## Managing 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 ethical business issues we might have to face, but our Business Principles are designed so as to ensure that our stakeholders know that Vodafone Greece always endeavors to make responsible choices.



This section of the Report is within KPMG limited assurance scope (see pages 89-91, Assurance Report)





## Responsibility is part of our Business Principles, Strategy and Governance

### Our Code of Conduct

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

The Code of Conduct seeks to provide specific guidelines on our day-to-day conduct and to help attain company targets and priorities. All company employees have been informed via the Code of Conduct about how to deal with corruption. The Code of Conduct requires that all employees act fairly, honorably and with integrity in their dealings with all stakeholders. It is one

of the tools used to ensure that we will continue to be a responsible business.

All employees are responsible for implementing the Code of Conduct, and managers are responsible for briefing those under them. In order to brief all employees, a Code of Conduct e-learning program was developed, attended by 74% of employees. Every year the management team signs a statement that it accepts the Code of Conduct and undertakes 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. No case of corruption was drawn to the Committee's attention via the available communication channels this year.

### 2013-2014 objective

All cases of corruption reported via available communication channels will be investigated and drawn to the Committee's attention.

### 2013-2014 result

There were no reports for cases of corruption.

### Degree of success

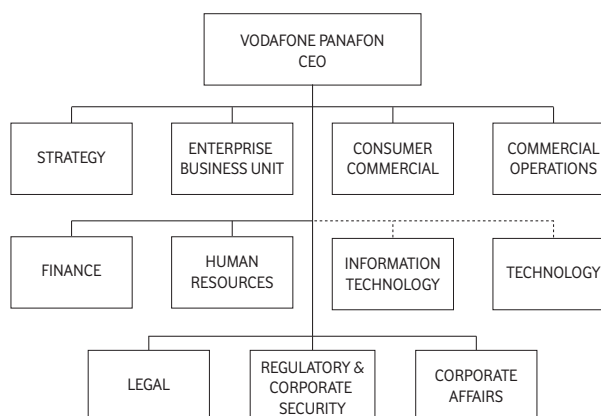
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## Our Business Principles

1. Individual conduct: We will act with honesty, integrity and fairness in our dealings both internally and externally. We will not tolerate any form of bribery, including improper offers of payments or gifts to or from employees. We will avoid any contracts that might lead to, or suggest, a conflict of interest between personal activities and the business. We will neither give nor accept hospitality or gifts that might appear to incur an obligation. We will pursue mutually beneficial relationships and seek to promote the application of our Business Principles with our business partners and suppliers.
2. Compliance with the law: We will comply with the provisions of all applicable domestic and international laws and appropriate standards and principles.
3. Health and safety: We will protect the health, safety and wellbeing of our customers, employees, partners and the communities in which we operate and disclose any information that comes to our knowledge that clearly demonstrates that any of our products or services breach internationally accepted safety standards or guidelines.
4. Financial integrity: We will provide the best possible return for our shareholders over the longer term. We will base our investment

decisions, acquisitions and business relationships on economic criteria but will also take into account social and environmental considerations.

5. **Public policy:** We will voice our opinions on government proposals and other matters that may affect Vodafone and our stakeholders. We will not make gifts or donations to political parties or intervene in party political matters.
6. **Communications:** We will communicate openly and transparently with all our stakeholders within the bounds of commercial confidentiality. We will protect confidential information from improper disclosure, and any authorised communication of confidential information should be limited to individuals who need it to carry out their work.
7. **Customers:** We will value the trust our customers place in us and will safeguard the information provided to us.
8. **Employees:** We will base relationships with and between employees on respect for individuals and their human rights and will not tolerate child labour. We will not accept any form of discrimination, harassment or bullying. We will pursue equality of opportunity and inclusion for all employees through our employment policies and practices.
9. **Communities and society:** We will engage with local communities to help us understand and respond to any concerns they may have, for example in relation to network deployment. We will always provide our stakeholders with access to correct, relevant and current information and build trust through integrity, transparency, honesty



and objectivity. We will invest in society in a way that makes effective use of our resources, including support for charitable organisations.

10. **Environment:** We will commit to protecting the environment. We will minimise our use of finite resources (such as energy, water and raw materials) and the release of harmful emissions to the environment (including waste, air emissions and discharges to water). We will seek to improve the environmental performance of the products and services we provide, as well as support those that offer environmental and social benefits to our customers.

In addition, the Vodafone Group's Corporate Governance and Policies Manual (available at [vodafone.com](http://vodafone.com)), which all members of the Group are obliged to adhere to and which is revised at regular intervals:

- covers optimum management of potential business risk
- stresses the importance of vision and values
- provides information about the structure of the Group's various teams, their competences, and sectors where guidance is required.

## Our Corporate Governance

Corporate Governance is a set of principles used to promote responsible management, running, organization and control of a company. Vodafone Greece attaches particular importance to Corporate Governance and has developed a set of principles and rules to ensure that the company operates in a transparent manner and to ensure that the company is managed in line with the interests of all stakeholders. Within this framework, we have the committees:

### Board of Directors

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

Age range						
	Board of Directors		Executive Committee		Management Committee	
	Men	Women	Men	Women	Men	Women
35-44	1	-	1	-	4	1
45-55	3	1	5	1	6	1
>55	-	-	-	-	-	1
<b>Total</b>	<b>5</b>		<b>7</b>		<b>13</b>	

Positions per gender						
	Board of Directors		Executive Committee		Management Committee	
	Men	Women	Men	Women	Men	Women
Men	4		6		10	
Women	1		1		3	
<b>Total</b>	<b>5</b>		<b>7</b>		<b>13</b>	

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 com-

pany, 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](http://vodafone.gr) and [vodafone.com](http://vodafone.com).

### Executive Committee

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

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

The company's Executive Committee has 7 members; the CEO, the CFO, the Human Resources Director, the Technical Division Director, the Consumer Commercial Director, the Enterprise Business Unit Director and the Customer Operations Director. It meets twice a month after the end of each month to discuss results, and extraordinary meetings are also scheduled whenever they are considered necessary.

### Management Committee

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

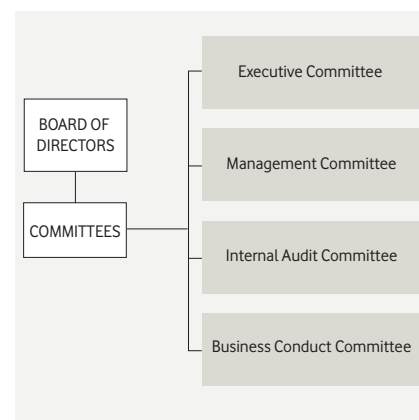
- Reviewing company results.
- Reviewing the progress of important projects and deciding on the next steps to be taken.
- Providing briefings about developments and/or new guidelines at Vodafone Group level.

The company's Management Committee has 13 members; namely all the 7 members of the Executive Committee and the Head of Legal and Company Secretary, the Corporate Affairs Senior Manager, and the Regulatory and Interconnection Senior Manager, the Strategy Director and the Products & Services Senior Manager. It meets once a month and there are a total of 12 meetings a year, but extraordinary meetings can also be scheduled if that is considered necessary.

### Internal Audit Committee

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

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



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

1. company internal audit procedures and systems
2. company risk management procedures and systems
3. company compliance with its legal and regulatory obligations
4. how issues arising from internal audits are handled, by analysing and reviewing all management activities intended to address gaps.

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

### Business Conduct Committee

The Board of Directors decided to establish a Business Conduct Committee which exercises disciplinary power within the company in line with its approved Labor Regulation. The Business Conduct Committee has 3 members; the Human Resources Director, the Chief Financial Officer and the manager of the department in which the employee charged with a disciplinary offence comes from. The Committee meets whenever there are disciplinary matters to be examined. For that reason the line-up of the committee cannot be broken down by age and gender.

The Business Conduct Committee is responsible for the following issues:

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

### '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 or by calling to a specific number. At the same time, Vodafone Greece undertakes to complete a timely investigation, follow-up and resolution of all issues reported. From November 2012 onwards it became possible to file an anonymous report about behavior that is not compatible with the Code of Conduct (see page 7), or company policies and procedures. Such reports can now be made by phone or using a special website. In December 2012 the company's lead suppliers were briefed about the 'Speak Up' program more than 150 main and basic suppliers. Our company in the context of information and awareness of all employees and management, held in December 2013 and February 2014 presentations, that also included the program «Speak Up». During 2013-2014 we received four reports, where after an internal investigation, it was concluded that there was no violation of company's policies and/or intentional non-compliance with company's business principles.

### Assessing the impact of our operation

Once a year, in Vodafone Greece, we assess our operation and we evaluate the impact of the issues that affect us. Our aim is to identify the risks and the opportunities arising from our operation, products and services. In specific, the following areas are examined:

- Contribution to public finance
- Contribution to employment
- Ethics – Corporate governance – Legislation compliance
- Mobile phones – Base stations – Health / Network deployment
- Electromagnetic fields (EMF)
- Privacy and security
- Employees
- Occupational health & safety
- Responsible supply chain
- Responsible marketing
- Services' content - Spamming
- Responsible mobile phone and internet usage
- Customer experience (billing, invoicing policy, etc)
- Energy – CO<sub>2</sub> emissions
- Waste
- Cooling - Fire suppression systems
- Environmentally friendly products and services
- Water – noise pollution
- Transport
- Emergencies
- Accessibility of products and services to all
- Utilising mobile communication technology, products and services, with a positive economic, environmental and social footprint

The process we follow to assess and evaluate the impact of issues that affect us includes the following stages:

1. Identification of direct and indirect impacts that Vodafone Greece's operations may have. The term "impact" includes the risks and the opportunities that may arise from the company's operations, products and services.
2. Risk or opportunity quantification, on a rating scale of 1-5, where 1=minor and 5=intolerable
3. Evaluation of risk or opportunity likelihood, on a rating scale of 1-5, where 1=rare and 5=highly likely
4. Significance assessment of identified risks or opportunities, based on likelihood and impact
5. Prioritization and target-setting to minimise risks or boost identified opportunities.

## Identifying our Stakeholders' expectations

In compliance with the principles of AA1000 standard, 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 (relevant analysis to follow) and to create a suitable atmosphere in which opinions can be expressed and exchanged.

The Stakeholders the company has identified in relation to Sustainability issues are as follows:

1. Non-Governmental Organisations
2. Government - Local Authorities – Institutions
3. Suppliers
4. Journalists
5. Academia
6. Business Community
7. Local Communities
8. Owners of Base Station installation sites
9. Parents – Teachers
10. Employees
11. Customers

### Stakeholder Engagement survey

To better understand the needs and expectations of the society in which we operate, adhering to the principles of AA1000 standard, once a year we perform a survey using an independent research firm. That survey may include in-depth personal interviews, a quantitative phone survey and focus groups, depending on the company's specific needs.

The following Stakeholders' categories participate in the aforementioned survey:

1. Non-Governmental Organisations
2. Government - Local Authorities - Institutions
3. Suppliers
4. Journalists
5. Academia
6. Business Community
7. Business Customers

In 2013-2014 we conducted our 5th Stakeholder Engagement Survey, on the basis of the phone survey methodology on the entirety of the sample. The aim of the survey in question was for Stakeholders to evaluate Material Issues pertaining to company operations, as well as the company's performance against specific indexes.

Regarding evaluation of Material Issues, the majority of the company's Stakeholders assess them as Extremely important /Very important in their entirety, giving the following five issues higher notes as far as their importance is concerned:

- ▮ Contribution to employment (direct and indirect employment) (79%)
- ▮ Safe internet usage by children and teenagers (79%)
- ▮ Privacy and security (76%)
- ▮ Occupational Health and Safety (72%)
- ▮ Employees (employee training/ development, benefits) (72%)

Processing the Stakeholder Engagement Survey's results, combined with the outcome of the assessment and evaluation of the "important" issues' impact on company operations, establishes – among others – the company's Material Issues (see p. 2-3).

### Face-to-face meetings

In the context of our consultation with Stakeholders, in order to inform them, while seeking to understand their needs and expectations with regard to our Sustainability Program, we regularly organise face-to-face meetings. The list of Stakeholders includes – among others – representatives from Non-Governmental Organisations, Business Community, National and Local Government, National and Local Media.



### General public survey

At Vodafone Greece we conduct a systematic nationwide survey of a representative sample of the general public, with the aim to assess consumer perceptions of the company's brand image. This survey reflects the degree to which the general public considers that Vodafone Greece is a company that operates responsibly towards society as a whole, compared to other mobile communications companies and concretely supports the country's economy and society.

We also evaluate the positive perception of our actions in the Sustainability field based on annual surveys conducted by independent firms in Greece. More specifically, according to the annual "Awareness and Social Behavior Index" (ASBI) prepared by MEDA Communication and VPRC, Vodafone Greece ranked 2nd in the CSR composite index, in terms of its recognizability, while it was 1st in the popularity index.

### Vodafone Group 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 its employees' opinions on various issues relating to their level of commitment to the company, their views about their management practices, their career prospects, job security and work conditions, as well as their overall satisfaction. (see p. 42).

### Employee survey on Sustainability

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.

### Participate in organisations

Both, the Vodafone Group and Vodafone Greece are members of international and national organizations operating in the Sustainability sector. In particular, the Vodafone Group, and Vodafone Greece by extension, as a member, belong to the:

- GSM Association (GSMA) and GSM Europe
- Global e-Sustainability Initiative (GeSI)
- International Telecommunications Union
- Joint Audit Cooperation (JAC)
- Telecommunications Industry Dialogue on Freedom of Expression and Privacy

Likewise, in Greece, Vodafone is an active member of the Hellenic Network for CSR. Moreover, Vodafone Greece is a Founding and Board 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). Accordingly, it is a member of the CSR Committee of the American - Hellenic Chamber of Commerce. The Vodafone Group, and Vodafone Greece, as a member, are also members of the FTSE4Good Index. For more information regarding the above organisations', such as participation start dates, please visit the relevant entities' websites.

### 2013-2015 objective

1. Carry out the 5th Stakeholders Survey
2. Carry out the Employee Survey on Sustainability programs.

### 2013-2014 result

The 5th Stakeholders Survey survey was carried out.

### Degree of success

100%

### ➤ 2014-2015 objective

1. Carry out the 6th Stakeholders Survey.
2. Carry out the Employee Survey on Sustainability programs.

## Integrating responsibility into our Management Systems

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

### ISO 14001

The Environmental Management System we implement for all our activities and facilities has been certified according to the requirements of the ISO 14001 standard since June 1999 (Certificate No. 04.33.01/006 ELOT). In October 2013 the annual surveillance audit of the Environmental Management System was successfully completed by the certification body Lloyd's Register Quality Assurance (Certificate No. 362212Δ).

### 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 OHSAS 18001 2007 standard. In 2013 the annual surveillance audit for the company's Occupational Health and Safety Management System was successfully completed. Certification was carried out by the certification body Lloyd's Register Quality Assurance (Certificate No. PIR0362212/C).

### ISO 9001:2008

The Quality Management System we implement for all our operations has been certified according to the ISO 9001 standard requirements since March 1996. Since July 2002 the Quality Management System implemented at the Vodafone retail chain 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 2013 the

Vodafone Greece certifications



annual surveillance audit of the Quality Management Systems that are implemented to the company and to the Vodafone shops was successfully completed. The audit was carried out by the certification body Lloyd's Register Quality Assurance (Certificates Nos. PIR362212/A and PIR362212/B).

#### EAOT EN ISO/IEC 17025

Vodafone Greece has an EMF (75MHz – 6GHz) & Noise Lab, accredited by the Hellenic Accreditation System, in line with ISO/IEC 17025/2005 standard. The Lab was developed in March 2009 (Accreditation No. 533) with an accreditation scope 75MHz – 3GHz. In March 2012, Lab's accreditation was extended to environmental noise measurements, while radio frequency range was extended to 6GHz (Accreditation No. 533-2). In February 2013, the company successfully renewed Lab's accreditation from the Hellenic Accreditation System (Certificate No. 533-3). These accreditations come as recognition of the reliable scientific work Lab does and its problem-free operation. Lab is fully equipped and staffed with suitable personnel who carry out EMF and environmental noise measurements in accordance with national and international guidelines and standards. The accreditation certificate ensures that Lab measurements are completely accurate and reliable. The validity of the procedure is ensured by the annual audit performed by the Hellenic Accreditation System.

#### ISO 27001:2005

Since 1999, as the first Greek mobile communications company and one of the first in Europe and the Vodafone Group, has been certified for its Information and Data Security Management System in order to provide the maximum possible security and protection of our customers' data (BS 7799). In June 2007, our company certified with the newest ISO 27001:2005 standard, which includes 133 security mechanisms and organizational measures (Certificate No.: PIR 362212 / F). The implementation of this system provides an integrated framework through which the security risks are identified, tested and evaluated systematically as well as proposed the security mechanisms to ensure the necessary protection level on our subscribers or employees data. In October 2013 re-certification of the Information and Data Security Management System was successfully completed with no findings by the certification body Lloyd's Register Quality Assurance.

#### ISO 22301:2012

Vodafone Greece's Business Continuity Management System, which applies to the planning, development, implementation, operation, maintenance and surveillance of mobile communications networks to successfully provide 2G and 3G voice services, Short Message service, Mobile Broadband services, fixed telephony services and business customer internet services, customer service operations in Greece, as well as sales and after sales customer service for mobile communications products and services – including mobile data services - is certified according to ISO 22301 by the certification body Lloyd's Register Quality Assurance

(Certificate No. 362212/K). Vodafone Greece is the first mobile communications company in the country to receive certification under the BS 25999 standard and one of the first within Vodafone Group. This certificate demonstrates the existence of an effective Business Continuity Management System which seeks to ensure the uninterrupted provision of critical Vodafone activities and services in the case of unforeseeable events. In 2013 the certification body Lloyd's Register Quality Assurance successfully completed the annual surveillance audit for Vodafone Greece's Business Continuity Management System.

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 were 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. The fine duly paid was returned to the company via settlement offsetting company fiscal obligations. The Administrative Authority for Secrecy of Communications re-examined the case in January 2013 and imposed a total fine of € 50.6 million on Vodafone Greece, that the

company duly paid. The company filed a petition for annulment before the Council of State, which was discussed in May 2014. Ruling is awaited. Likewise, the National Telecommunications and Post Commission (EETT) imposed a €19.1 million fine on the company. The company lodged an appeal against that Decision before the Athens Administrative Court of Appeal. Judgment No. 1237/2011 rejected that appeal. The Company has now filed a petition for cassation before the Council of State against that judgment, and the hearing date is set – following a stay – for December 2014.

#### 2013-2014 objective

Successful evaluation of the management systems by independent validation agencies.

#### 2013-2014 result

Management systems successfully evaluated.

#### Degree of success

100%

#### ► 2014-2015 objective

Successful evaluation of the management systems by independent validation agencies.

## Focusing on compliance with Group policies

As it is conducted in the entire Vodafone Group, Vodafone Greece evaluates the level of compliance to Group standards and policies. On an annual basis, the High Risk Policies are reviewed and in-depth checks are made to ensure that Vodafone Greece operation complies with Vodafone Group standards. The aim is to ensure the level of compliance and to identify measurable areas that require improvement. The methodology is common within Vodafone Group, focusing on the risk that policy non-compliance entails. The annual evaluation is conducted by specialised Vodafone personnel in order to ensure the reliability of results and to provide a consistent view about compliance issues to Top Management.

#### 2013-2014 objective

Successful evaluation of the implementation of 6 high risk policies according to Vodafone Group requirements.

#### 2013-2014 result

Overview of compliance on 6 high risk policies and identification of 9 areas that require improvement.

#### Degree of success

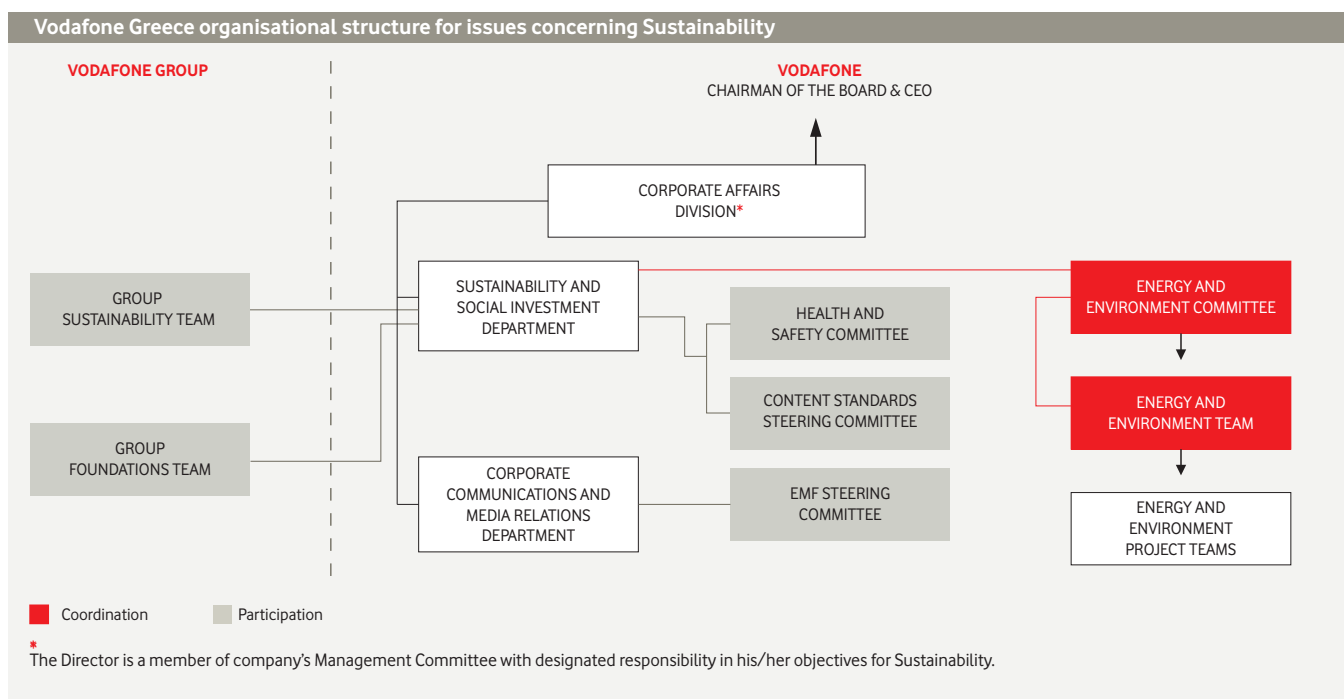
100%

#### ► 2014-2015 objective

1. Implement remediation actions in the areas that need improvement identified during 2013-2014.
2. Evaluate the 100% of the control mechanisms for 7 high risk policies.

## 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 and Sustainability Department participates in Vodafone Group Sustainability Team.
- To ensure better coordination of Corporate Responsibility and Sustainability issues, Vodafone Greece has also established the following inter-departmental committees:
  - the Energy and Environment Committee and Team charged with implementing sound environmental practices
  - the Content Standards Steering Committee, charged with continuous monitoring of content issues, including adult services made available via mobile phones. It is also responsible for validating and implementing local policies and for adapting international Vodafone Group guidelines on this matter
  - the Health and Safety Committee at work, responsible for identifying and investigating relevant issues and possible divergences from Greek legislation and company policies on employee Health and Safety issues
  - the EMF (Electromagnetic Field) Steering Committee, responsible for implementing Vodafone Group policies on EMF and safety issues and for ensuring compliance with Greek legislation.



## Evaluating our Sustainability performance

Based on procedures adopted by Vodafone Group in 2003, we evaluate our practices and activities at a quantitative level.

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

The results are collected twice a year basis and the results are included in this Report. There are over 300 indicators. Each year the indicators increase in number to cover the constantly expanding range of sustainability issues which we address.

## 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.

### 2013-2014 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.

### 2013-2014 result

1. Successful assurance of proper implementation and application of corporate processes and checks, including corrective actions and changes that were 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%

### ► 2014-2015 objective

1. Successful assurance of proper implementation and application of corporate processes and checks, which safeguard: a) the correctness of financial results and b) company revenues as well as sign off of the Entity Certification Form by the CEO and the CFO.
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.

In 2013, our business continuity planning activities focused on the following:

- improving the existing business continuity plans,
- testing the existing business continuity plans to ensure their effectiveness,
- continuing compliance with the ISO 22301:2012 standard (Societal security - Business continuity management systems)
- providing training and briefings to employees involved in business continuity plans.

### 2013-2014 objective

Continue compliance with ISO 22301:2012 Standard.

### 2013-2014 result

Successful compliance of the Business Continuity Management System in line with ISO 22301:2012 standard by the certification body Lloyd's Register Quality Assurance.

### Degree of success

100%

### ► 2014-2015 objective

1. Successful audit for the implementation of the Business Continuity Management System by an independent certification body.
2. Successful completion of 80% of the annual plan to test business continuity plans

## Coming into line with the bribery legislation

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

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

This policy was reviewed for the first time in June 2011 and has since been reviewed several times to be in line with UK Bribery Act 2010.

Vodafone Greece issued the local policy "Anti-bribery Compliance policy" (March 2012) which is in line with Vodafone Group's policies and the relevant clauses of the legislation in force.

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

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

- Members of the management team and employees are systematically brief about the legal requirements in this sector (via presentations and e-learning tools), about how to deal with cases of active and passive bribery, and about how to report instances of bribery.

- Company suppliers are also briefed about the new requirements and special limits have been introduced for existing contracts in line with the Vodafone Group's guidelines. It is also possible to report cases of bribery by contacting a specific email address as part of the 'Speak Up' program (see p. 11)
- Cases of bribery can be reported by company employees (who can provide their name or make an anonymous report) as part of the 'Speak Up' program (see p. 11)
- Written assurances are provided by all company Management team members about the non-existence of bribery cases are systematically provided.
- Risk methods and assessments are carried each year out to identify high risk areas and to specify improvements that need to be made.

The Code of Conduct implemented by both the Vodafone Group and Vodafone Greece contains a special section on the obligation to comply with this specific legislation. During 2013-2014 there was no relevant incident of non compliance.

## Performing internal audits of our operations

Vodafone Greece's Internal Audit Unit is part of the comprehensive assurance model the company has put in place to optimise and harmonise its risk management activities.

The unit's primary role is to conduct an independent, objective examination of how the company operates and to propose ways to optimise that based on the practices adopted by other companies in the Group and generally accepted corporate governance and auditing practices.

The annual audit schedule is prepared based on the company's estimated exposure to major risks. Estimated exposure is determined based on risk assessments and the management team's self-assessment auditing mechanism as well as the independent assessment made by the internal auditors. To ensure a high level of service is provided when implementing the schedule, auditors from other companies in the Group who are experts in high risk areas are actively involved in the audits carried out.

As part of its role, the Unit oversees the proper implementation of the annual self-assessment of the internal audit framework for all processes, and overall compliance with Group policies. The relevant questionnaires also cover Sustainability issues. The results of this assessment are signed off by the CEO to underscore the importance of this exercise.

## Exchanging examples of best practice

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

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

## Collaborating with the academic community

In order to stay abreast of new trends which are emerging all the time in the mobile telephony sector, we collaborate with the academic community. We respond to students from universities and educational institutions who request information on our operations and procedures as part of the academic studies.



1. Corporate magazine for employees
2. The 'Hellenic Network for CSR' logo
3. The 'Hellenic Business Ethics Institute' logo



## Communicating Sustainability principles

Vodafone Greece supported/participated in the following conferences/workshops that promote the principles of Sustainability and convey them to the public:

- 10 April 2013: 5th Infocom Green ICT Conference
- 20 June 2013: Corporate Waste & Recycling Conference
- 7-8 June 2013: Energy and the Environment event organised by the Municipality of Heraklion, Crete
- 27 June 2013: 3rd Corporate Social Responsibility Conference "People for the People" hosted by Capital Link
- 1-2 November 2013: 3rd Pan-Hellenic Inter-scientific Conference E-Life 2013
- 18 November 2013: 11th CSR Conference hosted by the Hellenic-American Chamber of Commerce
- 17 December 2013: Corporate Social Responsibility Seminar: The Business Case for the Environment" hosted by the Association of Chief Executive Officers and the Hellenic Network for Corporate Social Responsibility
- 12 February 2014: 4th Infocom Mobiles & Apps 2014
- 6 February 2014: 3rd Conference on internet safety hosted by the Cyber Crime Unit
- 12 February 2014: Press Conference hosted by the 7th Regional Health Authority of Crete on the participation of Vodafone Greece Telemedicine Program

- 25 February 2014: Corporate Responsibility in Practice Conference hosted by Marketing Week magazine
- 27 March 2014: Bravo 2014 Open Dialogue for Sustainable Development and Responsible Entrepreneurship held by the Quality Net Foundation

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 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 Sustainability programs we run.

- publication of 7 articles and in the corporate online magazine 'ejoin',
- presentation of the results of our programs, prevailing global trends, and examples of best practices from other organizations on the company's intranet (HUB),
- distribution of the Vodafone Sustainability Report for 2012-2013 in electronic format,
- news about all company programs on the company's bulletin board
- energy savings-related messages on the login screen,
- special messages on the thermostats at our premises reminding staff to correctly adjust the temperature depending on the season.

Furthermore, in 2013-2014 we conducted the internal communications campaign "Doing What's Right" that aimed at reminding to all employees their obligation to comply both with the company's Internal Regulation of Operation and the Regulatory, and Legislative framework (at national and international level) in which we operate and conduct our activities. The issues to which particular emphasis was given were relevant to the requirements of legislation in force:

- Combating Corruption and Bribery
- Key principles of Competition Law:
  - Forbidden Agreements/Practices
  - Random checks
  - Penalties

The following issues were also covered:

- Reporting mechanism of incidents and/or behavior contrary to the Company's Internal Operation Regulation
- Ensuring subscribers personal data and privacy
- Applicable policies for the security and communication of sensitive Company information.
- Structure and operation of compliance policies and procedures for all business operations of the Company.

### ► 2014-2015 objective

Repeat the "Doing What's Right" internal communications campaign.



## 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 communications 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 communications networks operate. At Vodafone Greece, we deploy our network of Base Stations in line with the guidelines issued by international scientific organizations and strictly comply with the standards adopted in relation to public exposure limits to electromagnetic fields.

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.

Frequency range	Safe exposure levels for the general public in Greece as a % of the EU's safe exposure levels					
	70%			60%		
	E (V/m)	H (A/m)	P (W/m <sup>2</sup> )	E (V/m)	H (A/m)	P (W/m <sup>2</sup> )
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 communications networks operate at frequencies of 900, 1800 and 2100 MHz.

In Greece, the safety exposure limits (basic restrictions and reference levels) for the general public are specified in paragraphs 9 and 10 of Article 31 of Law 3431 (Government Gazette 13/A/3.2.2006) on electronic communications and other provisions, as modified by the Law 4070/2012 (Government Gazette 082/A/10.4.2012), as well as in Articles 2-4 of Joint Ministerial Decision No. 53571/3839 (Government Gazette 1105/B/6.9.2000) of the Ministers of Development, Environment, Planning & Public Works, Health & Welfare, and Transport & Communications on Protective measures for the public regarding the operation of land antennas. That Joint Ministerial Decision was based on Recommendation 1999/519/EC of the Council of the European Union on limitation of the exposure of the general public to electromagnetic fields (0 Hz – 300 GHz) (see Table below) (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 they equal 70%.

Vodafone Greece's mobile communications network has been designed and installed based on the 60% of the recommended safety exposure limits for the general public irrespectively of whether there exist kindergartens, schools, elderly homes or hospitals within a distance of up to 300 meters from the Base Station installation. To ensure compliance within the national legislation regarding exposure limits, the company submits a technical study on the radio emissions for every Base Station to the Greek Atomic Energy Commission (GAEC). Micro Base Stations (cells operation at very low power – total effective radiated power is less than 164 Weirp) are excluded from the aforementioned requirement. Moreover, the company has the Vodafone ISO/ 17025-certified Environmental EMF and Noise Measuring Lab carry out regular checks (measuring the level of EMF radiation and noise) on a part of its Base Station network each year in collaboration with academic bodies such as Universities, NTUA and the GAEC. During 2013-2014, 11 checks were carried out.

Region	Average representative power Density value [W/m <sup>2</sup> ]
ATTICA	0.00766
EASTERN MACEDONIA & THRACE	0.0066
WESTERN GREECE	0.0041
THESSALY	0.0235
CENTRAL MACEDONIA	0.0137
CRETE	0.0086
SOUTHERN AEGEAN	0.0249
PELOPONNESE	0.0455
IONIAN ISLANDS	0.2416
WESTERN MACEDONIA	0.0062
NORTHERN AEGEAN	0.0243
CENTRAL GREECE	0.0009
EPIRUS	0.2479

EMF measurements from 13 regions of Greece (which measured power density units, W/m<sup>2</sup>) 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 implementing their obligations under Greek law.

In addition, mobile phones sold at Vodafone Greece shops comply with the ICNIRP guidelines on restricting the exposure of people to radio frequency (RF) fields. At the same time, we are also implementing an integrated information program for stakeholders and citizens about issues arising from the operation of mobile communications.

### 2013-2014 objective

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

### 2013-2014 result

Given that a workshop took place in 2012-2013 and there were no significant changes in 2013-2014 regarding human resources involved in the network deployment and operation, nor in related policies, a new workshop was not organised.

### Degree of success

0%

### ► 2014-2015 objective

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

## Global Group Policy Standard – Radiofrequency electromagnetic fields – Risk Management

At Vodafone Greece we implement a Health and Safety for RF Electromagnetic Fields policy for the proper management of potential risks for 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 design and supply until operation and maintenance thereby protecting the safety of employees and the general population.



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

## 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 European protocol (EN50566/2013) and the International protocol (IEC 62209-2/2010), for devices 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

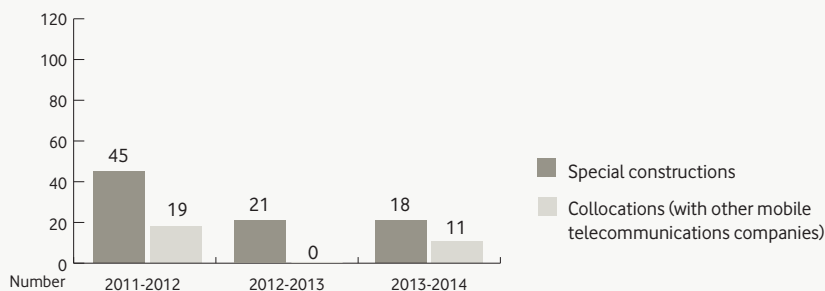
Aiming to reduce Base Stations visual impact, Vodafone Greece in 1998 began to design stylish small-scale antennas with a low visual impact in urban, semi-urban and sensitive surroundings. In particular, Vodafone Greece:

- ▮ 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 communications companies. In 2013-2014 there were 18 special constructions and 11 collocations.
- ▮ special installations, which blend into the surroundings, are also used such as Stations in the shape of a palm tree, cypress or church tower, or even with the majority of the installations located underground. These special constructions relate to Base Stations located in areas of special interest such as archaeological sites or national parks.

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



Annual special constructions - Collocations



## Compliance with environmental provisions

At Vodafone Greece we prepare the environmental studies required by the relevant legislation in order to ensure that any possible environmental impacts from the construction and operation of Base Stations are avoided. Depending on the Base Station category, we prepare either Environmental Impact Studies (EIS) or draw up and submit declarations agreeing to be bound by model environmental terms and conditions. Despite that, in 8 cases, a fine of €34,500 overall was imposed on the company, due to lack of proper studies. The complex, bureaucratic and time-consuming nature of the licensing and installation procedure of base stations functioned until June 2012 as a brake on the development of mobile telephony and uninterrupted communication among users. It is illustrative that more than 15 central/local authority services were involved in the licensing procedure while the time needed for licenses to be issued could reach 3 years. The new legal frame set in 2012 shortens the procedure of

antennas installation. The new procedure appoints EETT as one-stop-shop and allows construction of new antenna (or modification of existing one) within 4 months, having obtained a positive opinion from the Greek Atomic Energy Commission and the Hellenic Civil Aviation Authority (provided that no other competent government body has issued a negative opinion). Existing antennas under licensing procedure continue to operate lawfully, under conditions, and a 24-month deadline was issued for the completion of the licensing procedure, that is already extended for at least another 24 months (N.4249/2014) due to the large number of pending applications in the authorities involved. It is worth noting that one of the most important objectives of the new legal frame is the simplification of the licensing procedure. The relevant authorities have issued environmental approvals for the 60% of the studies submitted by the company, while transfer of existing pending approvals is in progress, to the new legal frame of submitting declarations instead, where applicable, in order to accelerate the license procedure of the base stations.

## Public perception surveys on mobile communications, technology and health issues

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

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

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

1. Mobile measuring station 'HERMES'

2. Informative leaflet for 'HERMES' program



## Informing the public

- During 2013-2014, we distributed more than 600 copies of the "The Apple of Discord: Technology, antennas, mobile phones, health" booklet via the Vodafone Greece shops, by direct mailing or at info-meetings with Greek authorities, bodies, the mass media, to company employees. This brochure explains (in easily comprehensible language) issues such as how mobile phones work, why we need antennas, the global and national regulatory framework for mobile communications and the views of the World Health Organization (WHO) and other respected international bodies on mobile communications, technology and health issues in easy-to-understand language.
- In 2013-2014 we continued to offer information on the [vodafone.gr](http://vodafone.gr) website section entitled "Antennas, mobile phones, technology and health" as well as at the company intranet (Hub). We also continued to offer training for company employees via the e-learning program entitled 'Mobile Phones, Masts and Health'. The program offers technically correct and scientifically documented information on all issues that staff should be fully and properly informed about so that they can answer any questions from the public properly. The program is available on the company intranet (Hub).

- In 2013-2014 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 communications network by complying with the technical requirements and the key rules of Greek law for network deployment.

### 2013-2014 objective

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

### 2013-2014 result

Issues were communicated.

### Degree of success

100%

### ► 2014-2015 objective

Communicate issues of mobile communications, technology and health based on scientific developments.

## Awareness and support Base Station installation sites owners

Owners of sites where company Base Stations are installed are major players when it comes to network deployment and retention. The call center we designed and develop to handle site owners has been operating successfully since 2008 and handles a large number of questions and requests daily, enabling those requests to either be resolved immediately or sent to the competent departments for resolution.

In 2013-2014 in particular, the call center and the relevant company department received more than 14,700 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: 15 days
- 1. Technical and procedural issues: 5 days
- 1. Relations between owners and local communities: Immediately

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.



1. Informative stand 'HERMES' in the Science Center and Technology Museum
2. Monitoring Station 'HERMES' in the Science Center and Technology Museum



## 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 communications antennas and radars. The 'HERMES' program is being implemented by the Mobile Radiocommunications Laboratory/National Technical University of Athens and the Radiocommunications Laboratory/Aristotle University of Thessaloniki. In order to improve the program in terms of know-how and to respond to requests for the installation of more measuring stations, the 'HERMES' program worked with the University of Piraeus' Internet and Telecom Systems, Services and Security Lab/Information Technology Department. The University of Piraeus collaborates with the National Technical University of Athens and the Aristotle University of Thessaloniki, which have overall responsibility for managing the 'HERMES' program. Program technological equipment has been provided to the universities by Vodafone Greece to allow them to implement the program.

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

In 2013-2014 the program was extended to 2 new locations, with a total of 125 measuring stations in 13 Regions around Greece. A monitoring station operates at the Thessaloniki Science Center and Technology Museum (NOESIS). 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 2013-2014, the HERMES Mobile Measuring Station took measurements in 2 Municipalities (the Municipality of Agia Varvara and Egaleo).

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

### The "ENIGMA" Information Program about Electromagnetic Fields

The "ENIGMA" program was 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 recorded the level of knowledge among specialists and healthcare professionals about modern lifestyle and technological development issues in the field of mobile communications, and provided scientific guidance on those issues.



Information program 'Enigma'

The program was implemented by the Health and Epidemiology Laboratory of the University of Athens Medical School and the Hellenic Society for Social Pediatrics and Health Promotion (HSSPPHP) from November 2006 to July 2013. Vodafone Greece supported the "ENIGMA" program.

The program's scientific team updated the bibliography every year and reviewed new scientific articles every year. It also conducted 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 were prepared for the program ([www.enigma-program.gr](http://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 were also conducted to record the views and opinions of specific population groups.

During the operation of the program, 44 info-seminars and 3 one-day workshops were organised for members of the Medical Association, health educationalists and medical schools. More than 2,500 people attended the seminars. At the same time, the program was presented to 62 Medical Conferences via an info-stand and relevant brochures were distributed. More than 12,430 brochures were handed out as part of the program.

During 2013-2014, the continuation of the ENIGMA program was evaluated and it was decided that it should be terminated since its works and objective have been achieved.

#### 2013-2014 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 2 new locations.
2. Evaluation for the continuation of the ENIGMA program.
3. Provide support to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 2 new areas.

#### 2013-2014 result

1. Extended the 'HERMES' program to 2 new locations.
2. The continuation of the ENIGMA program was evaluated and it was decided that it should be terminated since it has achieved its objective.
3. Conducted measurements via the 'Mobile HERMES' program, in 2 new areas.

#### Degree of success

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

#### ► 2014-2015 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 3 new locations.
2. Provide support to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 3 new areas.

## Customers

### Implementing responsible marketing practices and communication of our operation

In 2004 the Vodafone Group prepared a manual containing responsible marketing guidelines, which was updated in June 2012. 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 are seeking to:

- ▮ 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,
- clear-cut communications about the services we offer.

#### 2013-2014 objective

Check marketing materials in relation to the revised guidelines.

#### 2013-2014 result

Vodafone Greece's marketing materials were checked. No non-conformities were found.

#### Degree of success

100%

#### ► 2014-2015 objective

Check marketing materials in relation to the guidelines.

### We offer our customers an unparalleled network experience, wherever they are

We, at Vodafone Greece, commit to provide a reliable and technologically advanced mobile communications network which uninterruptedly covers our customers' communication needs, in terms of voice and mobile internet. We constantly upgrade our network and systematically invest in the most modern technologies to provide innovative services at the highest quality.

Since November 2012 our 4G network using LTE technology which ensures that customers have an exceptional mobile internet experience, allowing them to send and receive large files in a short time and to play back high-definition videos at the highest quality.

Meanwhile, we utilise progressively the spectrum at the 900MHz frequency to offer data services, and offering thus greater signal penetration and coverage even in inside spaces such as basements.

Furthermore, with an aim to timely and accurately inform our customers in a transparent way, we communicate developments and evolution in our network across the country but also at a local level, adapting our message according to the technological evolution of our network at each area.

### We offer our customers cost control of their usage wherever they are

Vodafone Greece is committed to being there for consumers, to listening to their needs and to reacting to them by offering reliable high quality products and services. Our primary concern is to improve the level of service we offer and to protect subscribers.

#### Cost Control

As a company that strives to meet our subscribers' need to have control over how much they pay, and to protect them in a simple, fast way from unexpected charges, Vodafone Greece offers since 2011 the Cost Control service.

- The service is automatically activated and is free of charge for all pre-pay and post-pay subscribers, consumer and business. Subscribers receive a free SMS once they reach 80% of the voice or data bundle of their tariff plan.
- All post-pay subscribers, consumer & business, can call or send SMS to 1284, with no charge, at any time to check their remaining voice/SMS or data bundle for their mobile. Pre-pay subscribers in particular can check their remaining allowances in real time by calling 1252 free of charge or by sending a free SMS to 1252 containing the message 'Y'.
- Respectively, all Vodafone Mobile Broadband subscribers, consumer and business, can check their data bundle allowance for their laptop or tablet at any time via the webpage [vodafone.gr/myvmb](http://vodafone.gr/myvmb). Even if the customer needs to exceed his data allowance, he has the option to get an extra data bundle and ensure even better cost control.
- The Vodafone Cost Control service is also available to all subscribers traveling abroad.
- Moreover, all post-pay subscribers, consumer and business, automatically receive a free SMS when their airtime and SMS allowance under their tariff plan is renewed.

Vodafone Usage Control



### Usage Control

In December 2011 Vodafone Greece launched the Vodafone Usage Control service for all pre-pay and post-pay subscribers (consumer & business) which provides control of the remaining tariff plan usage via bar charts. The service is available via mobile phones (smartphones) free of charge by downloading My Vodafone application or via laptop or tablet through My account section of [vodafone.gr](http://vodafone.gr). Subscribers can register for My Account free of charge at [vodafone.gr](http://vodafone.gr) or at any Vodafone shop.

The Vodafone Usage Control service won the 2012 Innovation Prize at the National Customs Service Awards and the Grand Effie Award 2012 at the Communication Prizes based on how effective it was.

In 2013-2014, following detailed analysis of monthly e-surveys conducted with subscribers using the services, but also following suggestions recorded by our customer care service, we have simplified all electronic services provided. This update improved and simplified electronic services tool, resulting in more customer-friendly services which provide a clear view of usage and charges in a quick and safe way.

In particular, subscribers enjoy the following services:

- Have access to their bills with call analysis (with a maximum bill retrieval period of 12 months)
- Generate call reports using easy filters (i.e. in bundle / outside bundle usage)
- Bill payment and top up airtime 24h a day via a secure environment
- Ability to activate prepaid bundles, renew airtime and bundle extension for pre-pay subscribers
- Directly communicate with their personal advisor, etc.

### Listening to our customers needs

#### Young people

Understanding to the need of our younger subscribers who need to communicate with everyone irrespective of the network involved, we offer CU tariff plans with x-net minutes so that all CU subscribers can talk freely with their friends. Furthermore, in order to cover the need of young subscribers for cheap internet on their mobile phone, we offer free MB upon 10€ top up. Also, CU users can each month participate in special promotions and receive "surprise gifts" from CU with free communication for one and / or several days.

We also support students with exclusive offers with free communication to CU subscribers, and also bundles with lots of airtime to all networks from CU pre-pay, exclusive 1+1 offers, discounts in devices and accessories, as well as special offers for internet at their laptop or tablet.

#### Friends & Family

Aimed at all adult subscribers who are looking for a simple, easy-to-use pre-pay service, Vodafone pre-pay offered the possibility of automatically activating a 200 minutes x-net bundle for a month upon 10€ top-up, with 5€ for the activation, setting free their communication channels.

At the same time the company also offered the Friends & Family program which charges just €0.01 a minute for calls placed to 2 other Vodafone numbers of the subscriber's choice without limitation any time of the day, any day of the week so that they can practically communicate free of charge with loved ones.

At Christmas 2013, in cooperation with Procter and Gamble, we supported 50,000 families with financial difficulties, offering free communication with CU pre-pay for an entire year to each member of the family so that they be in contact with their loved ones.

### Mobile Internet

To allow all pre-pay subscribers to acquire easier internet access via their mobile phones, we offered them the chance to surf the internet free for almost 1 whole month a year, and offered smartphones at particularly low prices with a discount for first time pre-pay subscribers (who were given the chance to acquire a Vodafone smartphone at the preferential low price of €69). We also offered internet plans of up to 500MB for just €5 so that all our subscribers could access the internet without having to worry about the cost.

### Vodafone International

We offer Vodafone International, a pre-paid tariff plan designed to cover the communication needs of immigrants in Greece. Customers all nationalities enjoy preferential rates when talking or sending sms to their country of origin and also benefit from free internet from their mobile phone as well as airtime. With every top-up, they earn bonus airtime on our network or free MBs for internet use from their mobile phone and free airtime to the same pre-pay bundle. Also, they have the possibility to buy affordable bundles for additional airtime to all networks or even for additional MBs for internet use from their mobile phone, for only €1.

### Post-pay subscribers

Taking into consideration our subscribers' need to talk and send SMS towards all operators while enjoying internet surfing worry-free, we launched the new Vodafone RED tariff plans in December 2012. These plans are designed to provide real worry-free communication with the most complete communication deal so far.

For the first time, Vodafone RED offers subscribers the option to have the following:

- Worry-free talk and SMS towards all networks
- A large number of MB for carefree internet surfing from their mobile phone
- Share the MB of your mobile plan with your laptop or tablet anywhere you are
- Handset repair in case of accidental damage or failure from a liquid.
- Vodafone Protect service for protection of your personal files in case of handset loss or theft.
- My Transfer service for transfer of your data and contacts to the new mobile phone.

The Vodafone 'Go Everywhere' roaming plan that offers Vodafone RED subscribers the option to use their voice, SMS and data bundles abroad for a small daily cost. Even greater savings and unlimited communication for the entire family since every member of the family has up to 20% discount with our family plan and an additional 10% saving when combined with hellas online fixed or internet service.

### Vodafone και Hellas On Line

Vodafone Greece, aiming to provide integrated communication solutions for mobile, fixed and adsl internet, proceeded with strategic co-operation with hellas online in 2009. During all these years, listening to our subscribers' needs we have offered converged plans for mobile, fixed and internet resulting in communication costs reduction for family. To communicate combo offers we:

- developed advertising materials 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.

Additionally, we provide customer service to all hellas online subscribers through the Vodafone shops network.

### Business subscribers

#### • Vodafone My Business

Vodafone Greece supports Greek businessmen and SME businesses since the 2012 launch of Vodafone My Business tariff plans designed to meet all their communication needs in a reliable, cost-efficient manner. Businesses enjoy a complete communication solution; they can communicate with all networks by paying a single fixed charge without any add-ons. More specifically these tariff plans provide:

- Lots of airtime to all national mobile and fixed networks
- Build-in MB allowance for mobile phone usage
- Unlimited intra-company communication
- The ability to use the airtime abroad.



#### • Vodafone Business Connect (VBC)

With Vodafone Business Connects we truly support businesses by proving a value for money complete fixed and internet solution.

All self-employed businessmen and SME businesses can enjoy real economy. By combining Vodafone Business Connect with Vodafone My Business tariff plans, they can make unlimited intra-company fixed and mobile calls and have a 20% on VBC forever. None the less, they enjoy even more benefits with VBC:

- ▢ Unlimited calls to national land lines and calls to 25 international land lines with domestic charges
- ▢ A free of charge domain name with the company's name (ex. www.mycompany.gr)
- ▢ Company Web site development
- ▢ Unlimited 5GB accounts (ex. info@my-company.gr)
- ▢ A variety of additional digital tools and services that facilitate communication
- ▢ A single bill for mobile and fixed telephony, from one single provider and one single point of contact

#### • Personalised treatment for businesses

With the purpose of always being by the side of our customers, business people and enterprises, Vodafone Greece created the first Personalised Customer Service Team. Each Business is assigned to a Personal Advisor who quickly and reliably handles any request. Effectively, businesses save time as they don't need to deal with issues themselves, be put on hold or repeat their issues to several people until they are resolved, and the time saved can be channeled towards their core business.

At Business Customer Care, personal advisors offer assistance relative to:

- ▢ Information on tariff plans and services
- ▢ Activation/deactivation of services
- ▢ Activation of call barring in case of device loss
- ▢ Clarification concerning their bill

The Business advisor visits customers at their premises whenever needed, following an appointment, offering:

- ▢ Insights on their communication needs
- ▢ Detailed brief on new Vodafone Greece Business Services
- ▢ Renewal of their business contacts
- ▢ Information on subsidies and devices

#### • Vodafone Greece Professional for Hoteliers

Vodafone Greece supports businesses through customised solutions that contribute to the businesses' operation agility and competitiveness. In particular, we reinforce the tourism sector which is the country's driving force, by offering Vodafone Professional for Hoteliers, a complete solution for communication, organization and promotion. This solution provides:

- ▢ Seasonal Vodafone Business Connect, Double Play (fixed and internet) with more airtime during high season and a significantly reduced charge during low season, while Hoteliers benefit further if they combine it with Vodafone Mobile
- ▢ Vodafone for Hotels Service, which includes an online service for organising bookings and availability, promotional offers for Hotels, as well as more tools that can be used from any device (pc, tablet, mobile phone with internet access). This service is free of charge exclusively for Vodafone Greece subscribers.





#### • **Vodafone Business Club**

In order to reward our customers we created Vodafone Business Club which is addressed exclusively to Vodafone Business Customers (companies and other self-employed professionals). The scheme's goal is to provide unique exclusive product & services offers (apart from the core businesses communication offerings) that are essential for businesses' daily operation and contribute to their operational cost reduction.

#### **Roaming services**

Vodafone Greece's new innovative 'Go Everywhere' service allows all Vodafone subscribers to communicate abroad carefree. In particular, for just €4.99 a day in Europe (EU, Albania, Switzerland, Iceland, Lichtenstein, Norway, FYROM and Turkey) or € 11.99 a day in more than 100 countries worldwide subscribers can:

- use their voice bundle towards all networks for outgoing calls to Greece and to the country they are in
- enjoy free incoming calls
- use the SMS that come with their tariff plan to send sms to everyone
- use the data bundle of their tariff plan (MB) to surf the internet, read emails or download applications.

With Vodafone Cost Control service, all Vodafone Greece subscribers have cost control of their usage across the world, since they are automatically informed free of charge via sms once they have reached 80% and 100% of the data bundle. Also, as of November 2013, Vodafone Greece offers its subscribers the possibility

of 4G roaming. Thanks to Vodafone 4G network, subscribers, consumer & business, have the possibility to use mobile internet at 4G speeds which are 10 times faster in relation to other technologies, in Germany, United Kingdom, Spain, Italy, the Netherlands, Portugal and Romania. At the same time, they may upload and download large volume files, high definition streaming and use multimedia applications.

#### **Mobile Internet**

For all subscribers who wish to surf the internet without worrying about the cost entailed, even if they are away from home, Vodafone Greece offered during 2013-2014:

- the option to surf completely free on their mobile, laptop or tablet at amazingly fast speeds via our reliable 3G network during Easter, Summer and Christmas. Specifically, all pre-pay and post-pay subscribers, consumer and business, with integrated data bundle or with add-on mobile internet plans along with Vodafone Mobile Broadband subscribers could enjoy unlimited free mobile internet. In addition, Vodafone subscribers with no mobile internet plan also had the opportunity to surf the internet free of charge without limitation.
- As part of a competition run by the National Research and Technology Network for which Vodafone Greece was chosen as the provider, we offered students and the academic staff of universities a University Mobile Internet plan for laptops and tablets at a particularly preferential rate. The University Mobile Internet plan is a service designed to provide practical support to the Greek academic commu-

nity. The plan offers 4GB to students and the staff of Greek universities and technological educational institutes for just €4.74 a month. Thanks to this initiative students and staff at tertiary education institutes have wireless internet access to the educational content hosted by their institute or on the web and are also being encouraged to utilise innovative, mobile communication-based platforms.

#### **Vodafone Mobile Broadband**

Vodafone Mobile Broadband post-pay tariff plans aim at internet users that need their laptop or tablet connection away from home. Vodafone has design cost-effective plans starting from €10/month to meet different needs. In addition, all Vodafone Mobile Broadband post-pay tariff plan subscribers need no longer worry about unexpected charges since from July 2011:

- they are informed automatically and real-time via SMS to Vodafone Mobile Broadband application when they reach 80% of their data allowance.
- when they reach 100% of the plan's usage allowance, usage is frozen but they can opt to continue surfing or not. To continue surfing they can buy an additional plan valid for 30 days (500MB or 5 hours at a cost of €10 and/or a 200MB or 2 hours plan at a cost of €5).
- Any Mobile Broadband users connected to the service can check their remaining allowance at any time via the webpage [vodafone.gr/myymb](http://vodafone.gr/myymb), that allows them to manage their connection.



### Vodafone KartolInternet

- ▢ The Vodafone KartolInternet service for all subscribers who want to connect to the internet via a laptop or tablet without any bills or commitments, just logging on whenever they want for as long as they want. Given that many of our customers need internet connections on their summer holidays, Vodafone Greece offered 30-days free internet access along with each Vodafone KartolInternet connection that includes a SIM card for accessing the service, usage instructions and a wireless USB modem. When purchasing a Vodafone KartolInternet connection all subscribers were given the chance to surf the internet free of charge from a laptop or tablet during their holidays.

### Vodafone Internet 4 Sharing

- ▢ In April 2013 we launched the innovative Internet 4Sharing service that offers our subscribers the possibility to share their tariff plan's MBs among other devices (tablet or laptop) so that they may surf from wherever they are and from any of their devices. Sharing of MBs can be among up to four devices, while there is also the possibility of buying additional MBs with the Internet 4 Sharing service, so that subscribers may freely enjoy faster mobile internet on their smartphone, laptop or tablet, no matter where they are.

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](http://vodafone.gr).

### Internet team

Since 2012 we have set up the "Internet Team" comprised of experts whose objectives it is to ensure the provisions of fast, easy, straightforward information and training to our customers about the internet and smartphones, and the best way to use them either directly or in conjunction with our products and services. This team helps us ensure that customers are fully briefed and informed at points of sale (shops, switchboards, website) from the very first moment they come into contact with the product so as to make their day-to-day life easier. Bearing in mind customer needs at all times, we monitor market trends and strive to ensure the best possible prices and to provide special offers on our mobile phones and the services available in-shop and via our other sales channels.

### Tap'n Pay – The first application for contactless transactions via mobile phone in Greece

Vodafone Greece and Alpha Bank, in cooperation with Visa Europe and First Data innovated and presented to the Greek market in February 2014 the first application for contactless payments via mobile phone (mobile payments). Tap'n Pay, the groundbreaking "mobile wallet", ensures maximum speed, ease and security in transactions, fully utilising the new capacities offered by the NFC (Near Field Communication) technology.

The innovative Tap'n Pay application requires the use of a special Vodafone Greece mobile phone SIM card, which safely stores the user's Alpha Bank Enter Visa debit card. It allows carrying out contactless transactions by debiting the bank account associated with the debit card, at businesses that operate points of sale with special contactless readers. Tap'n Pay was introduced in Greece on a pilot basis, during which selected users had the possibility to acquaint themselves with the application as well as all its privileges.

### Napster service

Vodafone was the first in Greece to become the exclusive reference in music, in July 2013 through the cooperation with the global digital music market, Napster. Napster allows Vodafone Greece subscribers to enjoy music on an unlimited and easy basis via streaming and access millions of Greek and foreign music titles on their smartphone, the tablet, or desktop computer, no matter where they are. The service is available for smartphones and tablets with Android, iOS (iPhone, iPad, iPod Touch) and windows, but also accessible from a web browser for desktop computers.

## Responding to consumer requests

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

- 904 from the EETT
- 428 from the Ministry of Development, 5 from the Consumers Institute and 4 from 'Quality of Life' Consumer Association.

Vodafone Greece's primary concern is to provide excellent customer service and to protect its subscribers. That is why the company has laid down extremely strict terms and conditions for collaborating with providers of Multimedia Information Services. We are in fact the first 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. We also allow customers to call the Vodafone Customer Service Department, free of charge, to activate the block on all multimedia information services or specific series of numbers (which offer voice or sms services).

## 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 communications users, regardless of the network they use by making information available on the [vodafone.gr](http://vodafone.gr) company website.

### 2013-2014 objective

Continue to provide information.

### 2013-2014 result

Continued provision of information.

### Degree of success

100%

### ► 2014-2015 objective

Continue to provide information.

## Informing and raising awareness among the public about Sustainability issues

We provide systematic briefing to the general public, regarding company's Sustainability programs, through articles, special publications and various information inserts in high circulation newspapers and magazines. In 2012-2013 we updated the page about Sustainability issues on [vodafone.gr](http://vodafone.gr) so that it is easier for readers to directly find concise information about the company's Sustainability programs.

### 2013-2014 objective

Inform public about Sustainability issues via articles.

### 2013-2014 result

Continue to provide information.

### Degree of success

100%

### ► 2014-2015 objective

Inform public about Sustainability issues via relevant articles.

1. bsafeonline program print insert
2. "Vodafone Safety Net" application
3. Youth Safe Pack



## Safe internet usage by children and teenagers

### Vodafone Greece bsafeonline: learning how to use the internet safely

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

### Access Control mechanisms

#### • Vodafone MyWeb services menu

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

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

#### • Internet

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

#### • Youth Safe Pack

To assist parents Vodafone Greece's shops are now offering a 'Youth Safe Pack' which is the first pre-pay card specifically designed for children. This SIM card comes with filters already installed that deactivate access to adult-based internet content and also does not allow calls to be made to high cost numbers, chargeable incoming sms or high cost sms to 5-digit numbers.

#### • "Vodafone Safety Net" application

Vodafone Greece offers a 'Vodafone Safety Net' application that allows parents—easy and free of charge—in cooperation with their child to decide on how he/she will use a smartphone's functions. It is available for all Android mobile phones.

Among other things the settings for 'Vodafone Safety Net' allow parents to decide how long each day their child can use the phone for calls and internet access, and to set the smartphone to only receive calls from a selected list of contacts. Thus, the application is a very useful tool against cyberbullying, as the user does not receive calls or text messages from unknown numbers or expunged, while text messages which are received by such numbers, are stored in the mobile's memory and can be accessed by the parent

If the application is deactivated by the child the parent will be notified by SMS. The app is available from Vodafone Updates and AppSelect and via the Play Store for all mobile communications subscribers (more than 9,000 downloads have been already performed).

1. "Parents' Guide" leaflet

2. bsafeonline program logo



## Safe internet usage information and awareness raising tools

### • [vodafone.gr/bsafeonline](http://vodafone.gr/bsafeonline)

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

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

### • **Parent's Guide**

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

### • **bsafeonline one-day events**

As part of the bsafeonline program, Vodafone Greece held a series of info-events in various cities nationwide in collaboration with child psychologists from the Hellenic Association for the Study of Internet Addiction. These events were intended for parents, teachers and anyone working with children. During the events, participants were able to hear from experts about the internet's unlimited potential, the risks users can encounter when surfing the web and about internet addiction and how to deal with it. Participants also had the chance to engage in discussion with experts and have any queries they had answered. 2 info-events were held nationwide in 2013-2014, attended by more than 110 parents and teachers.

### • **Teleconferences**

Vodafone Greece supports Teleconferences conducted by the Cyber Crime Unit in schools throughout Greece, through the Microsoft Office 365 offered by the company. The Teleconferences aim at raising awareness of children aged 5-18 years, for the internet risk. During 2013-2014 school year approximately 2,150 students were informed.

### • **World Day for Internet Safety**

Vodafone Greece in cooperation with SKAI group, at the World Day for Internet Safety, through SKAI television and SKAI and Melodia radio stations, held a relevant campaign, in the framework of Vodafone "bsafeonline: Learning to use the internet safely" program. The campaign aimed at informing viewers and raising awareness on safe Internet navigation through the use of short messages offering useful information and tips.

### • **Partnerships**

Vodafone Greece supported the Safe Surfing Events organised by the Cyber Crime Unit of the Hellenic Police in cities across all of Greece aimed at teachers, parents and children. It also supported in the 3rd Safe Internet Conference organised by the Ministry of Citizen Protection and the Cyber Crime Unit of the Hellenic Police, to celebrate World Safe Internet Day on 6 February 2014. At the conference, Vodafone Greece presented delegates with an overview of its well-rounded program entitled 'bsafeonline: learning how to use the internet safely'.

## Operating framework

### • Content Standards Steering Committee

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

### • European Framework

Vodafone Greece and Greece's other mobile communications 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 recognizable, and to prepare info campaigns for parents and children about safe mobile phone usage. At European level, Greece is one of the countries which has already implemented the majority of the provisions in the European Framework.

## 2013-2014 objective

1. Leaflet distribution.
2. Hold bsafeonline info-events in 8 cities nationwide.
3. Vodafone Mobile Broadband/tablets filter development.

## 2013-2014 result

1. Leaflet was distributed.
2. bsafeonline info-events organised in 2 cities nationwide. (due to different internal priorities, holding info events in 8 cities was not possible)
3. Filter for Vodafone Mobile Broadband/tablets was developed.

## Degree of success

1. 100%
2. 25%
3. 100%

## ► 2014-2015 objective

1. Leaflet distribution.
2. Hold bsafeonline info-events in 4 cities nationwide.
3. Information of subscribers on Vodafone Mobile Broadband/tablets filter availability.

## Supply Chain

### Applying the Code of Ethical Purchasing and supplier evaluation methods

Further to our collaboration with suppliers and NGOs and drawing on best practices, Vodafone Group developed a Code of Ethical Purchasing so as to set social and environmental standards. In Vodafone, with the aim to integrate sustainability in our supply chain, we work together with our suppliers to help them adopt the Code's principles and improve their social and environmental performance. Vodafone expects from all its associates to follow or avoid practices described in the Code. In particular, Code of Ethical Purchasing covers the following areas (for further information, please visit company's website [vodafone.gr/sustainability](http://vodafone.gr/sustainability)):

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



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

### New supplier qualification procedure

In Vodafone we have developed a special procedure through which it is determined how the company starts collaboration with new suppliers.

Any new supplier, wishing to collaborate with Vodafone, must follow the steps below:

1. Sign up at Vodafone electronic records of suppliers and accept the principles of the Code of Ethical Purchasing.
2. Fill in the Self-Assessment questionnaire, in which the supplier is invited to give details on the level of compliance of their operation with the principles of the Vodafone Code of Ethical Purchasing. The self-evaluation questionnaire includes questions on labour issues, health and safety, environmental management, bribery and corruption. More specifically, the sustainability criteria included therein are:
  - ✎ Commitment to the Code of Ethical Purchasing, including policies on child and forced labour
  - ✎ Public reporting of their performance on social, environment and health & safety issues
  - ✎ Certification of Environmental Management Systems to ISO14001 or EMAS standards

- ✎ Certification of Health & Safety Management Systems to OHSAS18001 or equivalent
  - ✎ Evidence that the supplier manages social, environment and health & safety issues in its own supply chain
  - ✎ Evidence that the supplier manages the risks and opportunities associated with climate change
  - ✎ Evidence of steps to manage and prevent bribery and corruption
  - ✎ Evidence that a supplier manages equality, diversity and inclusion
  - ✎ Evidence of how suppliers are adding social, ethical and environmental value to society
3. Based on the supplier's answers in the Self-Assessment questionnaire, a Risk Assessment is carried out regarding the company's cooperation with the supplier. Based on the analysis results, it is decided to:
    - ✎ start cooperation with the supplier
    - ✎ conduct an on-site audit to the supplier's facilities in order to ensure that their operation is in compliance with the principles of the Code of Ethical Purchasing.
  4. After successful completion of all above procedures, "approval" is granted in order for Vodafone to start cooperation with the new supplier.

During 2013-2014, there was no need to conduct an on-site audit to a new supplier.

### Supplier audits

In Vodafone, we conduct on-site audits to our suppliers to ensure compliance with the Code of Ethical Purchasing and systematically assess our cooperation with them, as well as their performance on project quality and delivery issues, business risk, privacy and security. Our aim is to achieve mutual trust with our suppliers via identification of areas for improvement, and help them also improve their own sustainability performance. In cases of non-compliance, corrective actions are proposed and should any supplier systematically fail to comply with Vodafone's principles, rules and standards, cooperation with them is terminated. In order for Vodafone to achieve improvement further down the supply chain, we ask our suppliers to require adoption of the Code of Ethical Purchasing, or other similar rules, by their own suppliers.

In 2013-2014 we carried out audits on 24 suppliers. As a result, we pointed out 57 findings, for which our suppliers agreed to engage in specific actions, in order to improve their performance. These findings involved the following issues:

- Compliance with Code of Ethical Purchasing (4 instances); in specific:
  - ✎ Payment issues (1 instance),
  - ✎ Individual conduct issues (1 instance)
  - ✎ Disciplinary practices issues (2 instances)
- Quality (12 instances),
- Health & Safety (4 instances),
- Information security (28 instances),
- Business risk (5 instances),
- Physical security (4 instances)

### 'Speak Up'

Since 2006-2007, we have developed and launched the 'Speak Up' program, a whistle-blowing mechanism that encourages suppliers and Vodafone Greece employees to point out any inappropriate conduct or practice by the company or its suppliers. Suppliers and Vodafone Greece employees have the ability to raise any concerns they have about the correctness of procedures and practices implemented by Vodafone Greece in the procurement sector by sending them to a specific email address or by calling to a specific number. At the same time, Vodafone Greece undertakes to complete a timely investigation, follow-up and resolution of all issues reported. It is also possible to file an anonymous report about behavior that is not compatible with the Code of Conduct, or company policies and procedures. For more information on the specific program, please see page 11.

### Vodafone Eco-rating

In July 2013, Vodafone innovated and launched Vodafone Eco-rating, a rating program for mobile phones, so that customers can choose the mobile phone they wish to buy based on environmental and social criteria too. The aim of the program is to motivate mobile phones manufacturers to design and produce mobile phones with ever better environmental performance. In addition to that, we aim to motivate the manufacturers to continuously improve their own environmental and social performance, regarding their operation, thus promoting good practices and developing social and environmental standards in the area of mobile phones industry. For more information on the specific program, please go to page 61 (or visit [vodafone.gr/eco-rating](http://vodafone.gr/eco-rating)).



Vodafone Eco-rating

### 2013-2014 objective

1. Complete the process of issuing and approving the updated Code of Ethical Purchasing in the Greek language, via company's corporate documentation system.
2. Incorporate updated Code of Ethical Purchasing into all contracts with the company's suppliers.
3. Promote Vodafone Code of Conduct to company's contractors, whose responsibilities relate to the deployment of company's network and its operation.

### 2013-2014 result

1. Completion of process of issuing and approving the updated Code of Ethical Purchasing in the Greek language, via company's corporate documentation system.
2. Incorporation of updated Code of Ethical Purchasing into 79% of contracts with the company's suppliers.

3. Incorporation of Vodafone Code of Conduct into contracts with the company's contractors whose responsibilities relate to the deployment of the company's network and its operation.

### Degree of success

1. 100%
2. 79%
3. 100%

### ► 2014-2015 objective

1. Update existing Code of Ethical Purchasing in order to enhance environmental standards and incorporate requirements for bribery and corruption prevention.
2. Incorporate Vodafone Code of Conduct into all contracts with the company's new suppliers, whose responsibilities relate to the deployment of company's network and its operation.

Vodafone Greece  
Headquarters in Attiki



## Employees

### Our employees at a glance

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 gender and irrespective whether they are on an open-ended or fixed-term contract or whether they work full-time or part-time. That pay is higher than the minimum salary set in collective labor agreements based on employee skill. We also offer side benefits.

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.

### The Vodafone Way

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

- ▢ **Customer Obsessed:** We want to exceed our customer's expectations, understand their needs, increase their dedication and do everything to make them feel important.
- ▢ **Innovation Hungry:** We are creating and offering new, innovative products and services and are constantly improving our systems and procedures so that they are not a barrier to the development and implementation of new or improved ways of working.

- ▢ **Ambitious & Competitive:** We bring energy and passion to our work, we believe in our abilities and set high standards for ourselves and our teams.
- ▢ **One Company, Local Roots:** We work as one company across all markets to achieve the best outcome for our customers, employees and shareholders. We value our diversity and build effective teams to deliver outstanding results, taking into account the local aspect of each market we operate in.

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

- ▢ **Speed:** We operate with speed in the market. We focus on rapid response and set priorities, always ensuring high standards of quality and safety.
- ▢ **Simplicity:** We make things simple for customers, associates and colleagues.
- ▢ **Trust:** We are reliable and transparent to deal with, not just with our customers but with each other. We act with honesty, fairness, integrity, in a reliable way and appreciate the trust and loyalty placed in us by our customers, our employees and our associates.

## 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 27.8% of managers are women. Moreover, 3 of the 13 members of the Management Committee are women.

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

## Trade unions and collective bargaining

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

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

## Improving communication and the exchange of ideas

All our actions concerning Vodafone Greece's human resources are governed by specific work principles that promote respect and confidence building. Our objective is to create an open line of communication between the company and its employees.

Through these communication channels, we aim at keeping employees abreast of company affairs (strategy, developments, new products and services, company initiatives) and to provide proper, up-to-date information about company policies and systems and to bolster "corporate culture". Line 3222, to which only company employees have access, can be used to make phone calls. It is accessible from corporate and employee mobile phone numbers (a number that has no fixed fee and is offered to employees at preferential rates) and from office phones. Line 3222 can be used for accounts, services, and IT support.

A human resources help desk (Ask HR) has been in operation since April 2003 which answers questions from all company employees about pay, leave, overtime, internal job ads, Medicare and pension plans, training courses and other general work-related issues. In 2013-2014 Ask HR received 6,872 requests by phone or online. Of all requests, 96% were answered within 3 working days by Ask HR help desk employees, while 91% of calls were addressed within 24 hours.

Level of education	
Ph.D.	1%
Postgraduate studies	25.9%
University degree	22.5%
Technical Education Institutes	15.9%
College	5.3%
Institutes of Vocational Education	15.6%
High School	13.7%
Other	0.1%

No. of Employees	
2013-2014	1,550
2012-2013	1,756
2011-2012	2,122

Gender	
Women	52%
Men	48%

New recruits:	
2013-2014	111
2012-2013	83
2011-2012	77

Turnover*	
2013-2014	6.7%
2012-2013	17.3%
2010-2011	7.8%

\* 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.

Age	
Lowest	21
Highest	60
Average	37

Departures	
2013-2014	317 *
2012-2013	445
2011-2012	288

\* 31.9% women & 68.1% men

#### 2013-2014

Contract type	Total	%
Open-ended	1,535	99%
Fixed-term	15	1%
<b>Total</b>	<b>1,550</b>	<b>100%</b>

#### 2013-2014

Contract type	Part timers		TEI practice		Full timers		Seasonal		Total	
	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women
Open-ended	13	21	0	0	732	769	0	0	745	790
Fixed-term	0	0	0	0	5	10	0	0	5	10
<b>Total</b>	<b>13</b>	<b>21</b>	<b>0</b>	<b>0</b>	<b>737</b>	<b>779</b>	<b>0</b>	<b>0</b>	<b>750</b>	<b>800</b>

#### 2013-2014

Gender	New recruits						New recruit departures					
	<25	25-34	35-44	45-55	>55	Total	<25	25-34	35-44	45-55	>55	Total
<b>Women</b>	7	49	5	1	0	62	0	8	1	0	0	9
<b>Men</b>	4	36	6	3	0	49	0	7	0	0	0	7
<b>Total</b>	<b>11</b>	<b>85</b>	<b>11</b>	<b>4</b>	<b>0</b>	<b>111</b>	<b>0</b>	<b>15</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>16</b>

#### Parental leave

Vodafone Greece in addition to those provided by the legislation on parental leave, enables working mothers who choose not to make use of a six-month maternity protection of the Employment Agency, the possibility of a 2-month absence from work with pay. In 2013-2014, 2 men and 21 women benefited from this childcare parental leave (regardless if their leave began or ended in another fiscal year).

Age range															
	2013-2014					2012-2013					2011-2012				
Gender	<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	13	354	379	50	4	14	390	384	50	-	12	527	487	65	-
Men	10	261	389	87	3	10	329	495	82	2	14	387	541	83	8
Total	23	615	768	137	7	24	719	879	132	2	26	914	1,028	146	8

## Positions per gender

	2013-2014				2012-2013				2011-2012			
	Managerial	Staff	Managerial %	Staff %	Managerial	Staff	Managerial %	Staff %	Managerial	Staff	Managerial %	Staff %
Men	65	685	72.2%	46.9%	78	840	78%	50.7%	103	930	81.7%	46.6%
Women	25	775	27.8%	53.1%	22	816	22%	49.3%	23	1,066	18.3%	53.4%
<b>Total</b>	<b>90</b>	<b>1,460</b>	<b>100%</b>	<b>100%</b>	<b>126</b>	<b>1,656</b>	<b>100%</b>	<b>100%</b>	<b>126</b>	<b>1,996</b>	<b>100%</b>	<b>100%</b>

## 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.

### Vodafone Group 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 management practices, their career prospects, job security and work conditions, as well as their overall satisfaction. The key indicators in this survey are:

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

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 2013 People Survey, Vodafone Greece achieved a 92% participation rate. The engagement index was 84%, while the manager index was 79% and the Employee Net Promoter Score was 80%.

### 2014-2015 objective

Carry out the Employee Survey.

### Strategy

In 2013-2014 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 135 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, 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.

- ▢ '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. A total of 7 proposals were submitted from April 2012 to March 2013, 6 of which received individual or team rewards. These related to projects of particular importance for the company's objectives and priorities.

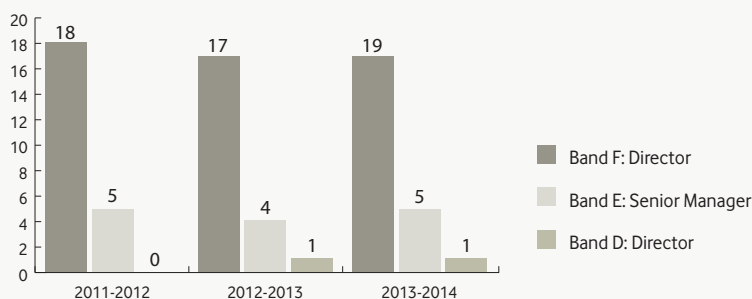
The 'Voice of the Customer' program places emphasis on customer experience issues, which in effect helps Vodafone Greece executives focus on the customer so as to understand their needs and wishes. The program includes:

- ▢ Monthly visits by the Management Committee to corporate customers, Vodafone Greece shops and customer services.
- ▢ Monthly 'Voice of the Customer' meetings with top company executives to solve problems reported by customers.





Women in managerial positions per band



#### 2013-2014 objective

1. Design the 'Inspire to Change' program and run the program for all shop managers.
2. Continue cross-functional projects.
3. Continue the Skills Development Center for the Enterprise Business Unit and Consumer Business Unit.
4. Design and develop a skills development center for Commercial Operations Division.
5. Continue the recognition programs 'Make a Difference' and 'The Vodafone Way Global Heroes'.
6. Run mentoring programs and workshops with emphasis on developing leadership skills for company executives.

#### 2013-2014 result

1. Design and implement the program to all Vodafone shop managers.
2. Cross-functional projects continued to be implemented.
3. The programs for the Enterprise Business Unit and Consumer Business Unit continued.
4. The specific courses were not held because of other project prioritisation.

5. The recognition programs were continued.

6. Mentoring programs and workshops with emphasis on developing leadership skills for company executives were carried out.

#### Degree of success

1. 100%
2. 100%
3. 100%
4. -
5. 100%
6. 100%

#### ► 2014-2015 objective

1. Implement "Leading in the Vodafone Way" and "First Time Line Manager" programs to the company's managerial staff.
2. Continue the "Skills development center" program for the Enterprise Business Unit and Consumer Business Unit.
3. Redesign and implementation of training programs for new recruited employees of the Commercial departments.
4. Continue 2 recognition and rewarding programs.

5. Continue Mentoring and workshops programs with emphasis on development of managers' leading skills.
6. Create of commercial culture for 100% of employees through the "Commercial Mentality" program.
7. Implement the new "Vodafone Way of Retail" training program on shops employees.
8. Continue the Marketing Academy program for all employees of the marketing departments.
9. Implement the "Vodafone Way of Selling" program on corporate sales employees.

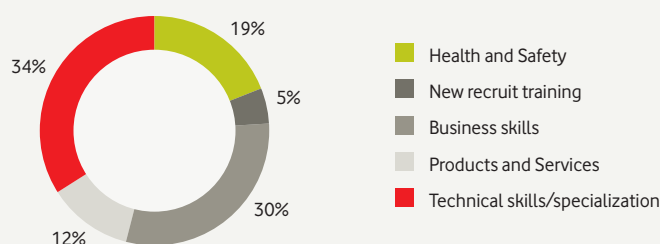
### Providing opportunities for life-long learning

At Vodafone Greece, 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' seeks to ensure that everyone falls into line with company strategy and to create development actions for every year which will assist employees in attaining their goals.



The percentage of training hours per category of training 2012-2013



Training – average no. of training hours per position

	Managerial	Staff
2013-2014	23.42	18.40
2012-2013	19.4	33.26
2011-2012	24.5	24.1

Each year 100% of staff who have worked for the company for more than 3 months are evaluated.

During 2013-2014, 1,550 employees covered by the procedure were evaluated, 48.3% of whom were men and 51.7% were women.

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.

'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.

Training – average no. of training hours per gender

	Men	Women
2013-2014	20.08	17.05
2012-2013	22.84	21.92
2011-2012	30.78	30.6

#### 2013-2014 objective

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

#### 2013-2014 result

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

#### Degree of success

100%

#### ► 2014-2015 objective

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

During 2013-2014, Vodafone Greece invested more than € 269,000 on training its employees.

#### Training 2013-2014

(No. of hours per position and per gender)

Men	904
Women	814

#### Training – No. of hours per position and per gender (2013-2014)

	Men	Women
Managerial	1,416	528
Staff	16,740	13,356
<b>Σύνολο</b>	<b>18,156</b>	<b>13,884</b>

Training sectors we focus on are the following, combining training room, e-learning, action learning, workshops, as well as suggested bibliography:

1. Training in products/services
2. Training in scope of work/specialisation
3. Training in business skills/executives development
4. Training in health, safety issues and handling emergencies
5. Orientation training

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

'6 Absolute Health and Safety Rules'  
promotional material



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

#### 2013-2014 objective

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

#### 2013-2014 result

Continue to bolster the corporate culture.

#### Degree of success

100%

#### ► 2014-2015 objective

Continue to bolster the corporate culture "The Vodafone Way" for 100% of employees.

### Strategic partnerships with universities

As part of our objective to build the best possible team and to provide a productive working environment that encourages knowledge acquisition and personal growth and development:

- ▮ We support students from Greek universities who want to do work experience at the company.
- ▮ We encourage the transfer of knowledge via educational workshops and lectures given by top company executives.

- ▮ We collaborate with students and their professors on dissertations that are being prepared.
- ▮ We actively participate in career days held by University Departments
- ▮ We offer positions to students to allow them to acquire experience. During 2013-2014 as part of the Discover Graduate Program we gave 11 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.

#### 2013-2014 objective

Continuation of the 'Discover Graduate Program' with the goal of recruiting 10 postgraduate students or/and alumni.

#### 2013-2014 result

11 postgraduate students were recruited.

#### Degree of success

110%

#### ► 2014-2015 objective

Continuation of the 'Discover Graduate Program' with the goal of recruiting 11 postgraduate students or/and alumni.

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

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.

At Vodafone Greece in order to confront emergencies, we have prepared and implemented an emergency plan at all its facilities and during 2013-2014 10 evacuation drills took place at all company facilities in which 1,750 employees participated. The company also makes use of Safety Volunteers who assist in evacuating colleagues, associates and customers from build-

ings if need be. Currently, there are 85 Safety Volunteers.

Moreover:

- ▢ 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 trained 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.

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.

#### 2013-2014 objective

1. No increase in workplace accidents compared to 2012-2013.
2. Develop and run an e-learning program about occupational health and safety issues for 35% of employees.

#### 2013-2014 result

1. No increase in workplace accidents.
2. e-learning program followed by 58% of employees

#### Degree of success

1. 100%
2. 166%

#### ► 2014-2015 objective

1. No increase in workplace accidents compared to 2013-2014.
2. Develop and run an e-learning program about occupational health and safety issues for 90% of employees.

The gym in Vodafone Greece Headquarters in Attiki



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\***

<b>2013-2014</b>	0.96%
<b>2012-2013</b>	1.26%
<b>2011-2012</b>	1.28%

\*  
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)

## Voluntarily offering benefits to employees

Vodafone Greece offers its employees benefits that include:

- ▢ medical scheme for all employees and their dependents
- ▢ favourable policies for working mothers, for the period of maternity
- ▢ one additional day off during Christmas/New Year
- ▢ regular check-ups for employees engaged in high risk activities (base station employees, warehouse staff and messengers) and daily cooperation with Work Doctors

Table of accidents	2013-2014	2012-2013	2011-2012
(all accidents cited involved loss of working time)			
Fatal accidents involving company staff	0	0	0
Fatal accidents involving associates and contractor's staff	0	0	0
Third party fatal accidents (customers, etc.)	0	0	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 (Women: 100%)	2 (Men: 50% Women: 50%)	1 (Men: 100%)
Controlled work-related accidents (i.e. accidents at company facilities) involving company staff	2 (Men: 50% Women: 50%)	2 (Men: 50% Women: 50%)	3 (Men: 33% Women: 67%)

- ▢ a fully equipped gym is in operation at the company's headquarters for employees to use and keep in shape a basketball team which takes part in company championship
- ▢ financial support for the participation of employees' children in summer camps all over Greece
- ▢ once a year organise a party for employees' children, at which gifts are distributed
- ▢ discounts and special offers on company products

Moreover, 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 2.5% of their salary. In 2013-2014, this figure was approximately €1,280,000.



## Eco-Efficiency

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



## Eco-Efficiency

### Environmental aspects of a mobile telecommunications company's operation

#### 1 Electromagnetic fields

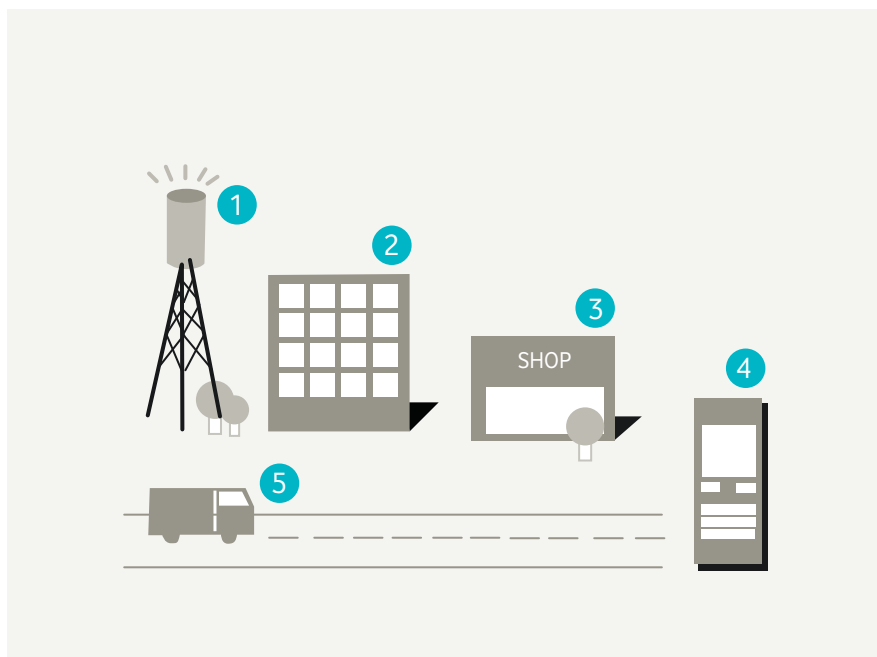
Από τη λειτουργία του δικτύου κινητής επικοινωνίας εκπέμπεται ηλεκτρομαγνητική ακτινοβολία στο περιβάλλον η οποία το επηρεάζει. Για το λόγο αυτό, οι προδιαγραφές λειτουργίας του εξοπλισμού δικτύου πρέπει να ακολουθούν τα όρια που θέτουν διεθνείς οργανισμοί (π.χ. Διεθνής Επιτροπή Προστασίας από τις Μη Ιονίζουσες Ακτινοβολίες - 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.

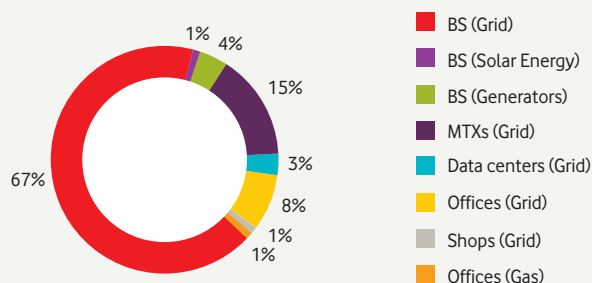
#### 5 Transportation

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.

Energy consumption allocation 2013-2014



## Preventing CO<sub>2</sub> emissions to the atmosphere\*

We are implementing programs through which we significantly reduce energy consumption at our network and offices. In 2013-2014 we estimate that we prevented the emission of more than 50,900 tons of CO<sub>2</sub> into the atmosphere via our energy efficiency programs and the use of renewable energy sources, activities which are outlined below. The cost savings from these energy programs are in the order of € 11.5 million, a figure which represents 1.62% of the overall company turnover.

### 2013-2014 objective

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

\* In 2013-2014 the method for calculating energy savings at base stations was improved. For that reason, results regarding CO<sub>2</sub> emission prevention from company's programs, for the last 2 years, have been adjusted accordingly, in order to ensure comparativeness of results.

### 2013-2014 result

1. The emission of 50,933 tons of CO<sub>2</sub> was prevented.

### Degree of success

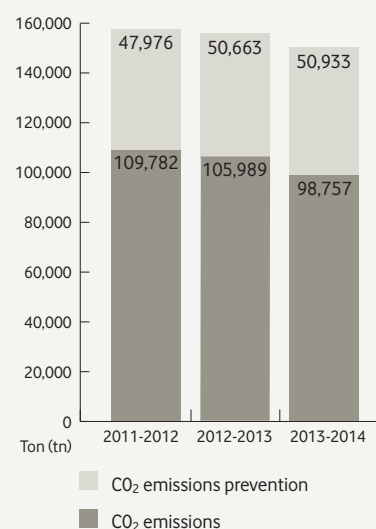
1. 102%

### ► 2014-2015 objective

1. Prevent the emission of 51,000 tons of CO<sub>2</sub>.
2. Reduce, by 2020, CO<sub>2</sub> emissions by 50% against a 2006-2007 baseline (this is a Vodafone Group overall commitment).

## Innovating by using renewable energy sources

Utilising solar energy, having installed hybrid photovoltaic systems at 45 Base Stations, located in non – urban areas, not covered by the national grid, which operate with diesel-fuelled generators. During 2013-2014 we improved efficiency of photovoltaic systems by modifying connection with electric charge, thus resulting in an approximate 25% increase in the amount of energy available for use. The energy produced by the photovoltaic systems is 0.6% of the total energy used by the network.

CO<sub>2</sub> emission prevention from Vodafone Greece programs

### 2013-2014 objective

Integration of photovoltaic systems at 30 more base stations in order to implement the combined operation of photovoltaic and hybrid schemes.

### 2013-2014 result

Photovoltaic systems were integrated at 38 more base stations in order to implement the combined operation of photovoltaic and hybrid schemes.

### Degree of success

127%

### ► 2014-2015 objective

Transfer of photovoltaic systems from base stations that were connected to the power grid to 10 more base stations, which are powered by generators in order to implement the combined operation of photovoltaic and hybrid schemes.

Photovoltaic System  
in Base Station



## Saving energy across our network\*

### Heating/Cooling energy savings

#### Base Stations

At Vodafone Greece we save heating/cooling energy at Base Stations which accounts for around 50% of their total energy consumption. Savings are achieved by installing 'Free Cooling' systems that take into account the external temperature, maintaining areas adequately cool.

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.

As a result of these initiatives, approximately 70% of the base stations air-conditioning units are either "free cooling" or "inverter" operated. Furthermore, since 2006-2007, we have been gradually adjusted cooling and heating temperature set-points at base stations so as to reduce energy consumption. During 2010-2011, we further increased cooling temperature (from 28°C to 32°C) thereby significantly reducing energy consumption.

#### MTXs and Data Centers

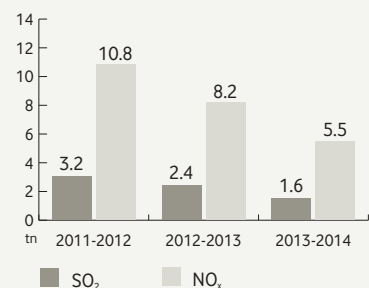
Since 2006, at Vodafone Greece we have implemented all the necessary actions, in order to save heating and cooling energy at MTXs and Data Centers which accounts for around 50% of total energy consumption at a MTX and Data Center. In 2013-2014 back-up air-conditioners with a total installed capacity of 1,100 KW at the company's MTXs and Data Centers were kept of-line, resulting in energy saving of 1,009 MWh and 998 tons of CO<sub>2</sub> prevention from being emitted in the atmosphere.

Since 2008, we have increased the cooling temperature point in the areas of MTXs and Data Centers, from 21°C to 23°C and 25°C, depending on the needs of each area, thus resulting in 600 MWh energy savings, in 2013-2014, and 593 tons of CO<sub>2</sub> prevented from being emitted in the atmosphere.

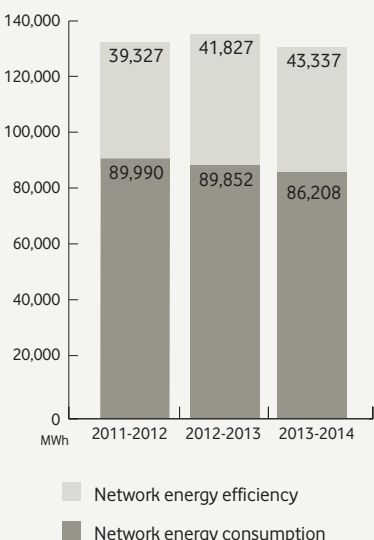
#### New telecommunications equipment at Base Stations

In 2011-2012 we started replacement of existing 2G and 3G access network equipment with new tech equipment. The new equipment can support both technologies at the same time and is around 25% more energy efficient. In addition, placing part of the equipment outdoors reduces cooling needs thus contributing to further reduction of energy consumption. By 2013-2014, the installation of new equipment has resulted in an overall energy saving of about 3.1 GWh, while more than 3,300 tons of CO<sub>2</sub> are prevented from being emitted in the atmosphere.

#### Sulphur dioxide (SO<sub>2</sub>) and nitrogen oxides emissions (NO<sub>x</sub>)



#### Energy efficiency from programs implemented in Vodafone Greece's network



\*

The company's network includes Base Stations, MTXs and Data Centers. In 2013-2014 the method for calculating energy savings at base stations was improved. For that reason, results regarding energy efficiency from programs implemented in company's network, for the last 2 years, have been adjusted accordingly, in order to ensure comparativeness of results.

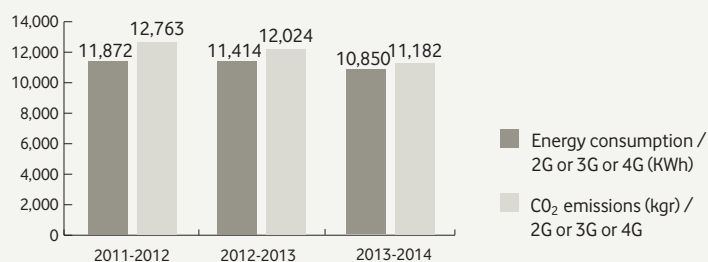
### Activation of energy saving mechanism at 2G & 3G Base Stations

In 2010-2011 we put in place a mechanism to all 2G Base Stations that monitors in real time the telecommunication traffic of each Base Station and keeps active only the TRXs that are essential to cover the specific needs. Excess TRXs are deactivated, thereby saving energy, which is estimated to be around 4.5% of the total base station energy consumption; while retaining high quality service offered to customers. In 2012-2013, this mechanism was further applied to 3G base stations, where a similar energy saving feature was activated, at periods of low telecommunication traffic.

### Power generation at base stations

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

Energy consumption per network element (2G or 3G or 4G)



In our endeavor to further reduce environmental impact of gens operation, we applied in 2010-2011, a hybrid operation scheme to the stations using batteries. This resulted in a 17.5% decrease in diesel consumption. In 2011-2012, we improved the hybrid operation through extending the time period during which the stations operate with batteries and the time period was further extended in the following years, resulting in all hybrid base stations operating with batteries for about 12.7 hours per day, in 2013-2014. By applying this program to 149 hybrid stations, 1,008,689 lt diesel were saved in 2013-2014 and 2,673 tons of CO<sub>2</sub> were prevented from being emitted in the atmosphere.

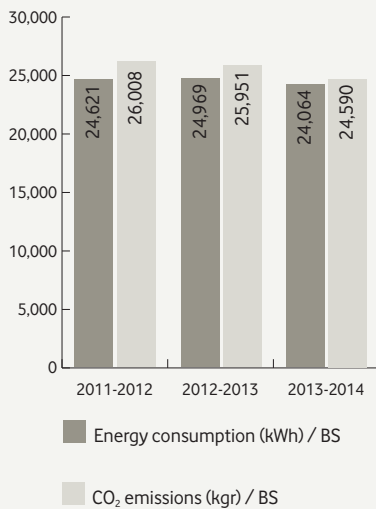
### Electromechanical infrastructure upgrade at MTXs

In 2010-2011 we improved the electromechanical infrastructure at the company's MTXs in Metamorfossi to optimise operations. In specific, we upgraded part of the old electromechanical equipment, removed old tech telecom equipment, performed cabling management, made appropriate changes in the indoor space and improved air-conditioning system. This program resulted in 1,040 MWh energy saving in 2013-2014, thus annual prevention of 1,029 tons of CO<sub>2</sub> being released in the atmosphere.

Free Cooling



### Vodafone Greece network energy consumption



### Power quality optimisation of electrical facilities at MTXs

In 2010-2011 we installed special harmonic filters in the electrical panels of Pallini MTX to optimise the power quality of the electrical facilities. Via this program, it was estimated that we annually save 8% of the total energy needed for the operation of the building. In 2013-2014 this figure is translated to 523 MWh energy saving and 517 tons of CO<sub>2</sub> prevented from being emitted in the atmosphere.

### Κέντρα Μεταγωγής (MTXs) της εταιρείας

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



### Data processing facilities optimization at Data Centers

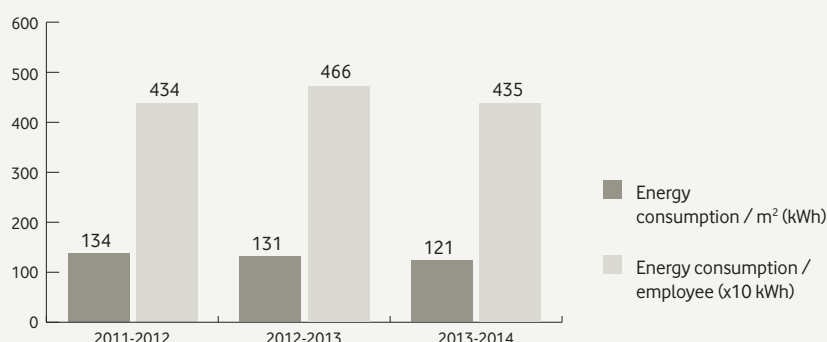
In 2010-2011 we implemented a pilot program at Data Centers of Pallini and Kifissos which utilised the "virtualisation" technology in order to improve the operation effectiveness of computer systems. The principle concept of virtualisation is that any function can be run on either real machinery (physical servers) or virtually using software programs. The computing power of a physical server is fully utilised by simulating at the same time multiple virtual servers, thereby allowing many systems to run on one 'virtual' system. This reduces the need

for physical servers and increases the capacity of existing servers, while improving their performance.

This program was extended in 2012-2013 at the Data Center of Pireos, achieving in 2013-2014, a ratio of physical to virtual servers of 1 to 7.5 and a percentage of virtual Data Centers servers of 72%. In particular, we virtualised 33 servers; i.e. we disconnected 22 servers and avoided the purchase and installation of 11 new ones. As a result, we achieved, in 2013-2014, an energy saving of 972 MWh and prevented the emission of 961 tons of CO<sub>2</sub> into the atmosphere.



Vodafone Greece offices energy consumption

**2013-2014 objective**

47% savings in network energy consumption.

**2013-2014 result**

50% savings in network energy consumption (this represents 34.444 MWh energy saving at Base Stations and 8.892 MWh at MTXs/DataCenters).

**Degree of success**

106%

**► 2014-2015 objective**

51% savings in network energy consumption.

**Saving energy at the company's offices\*****Lighting efficiency**

Since 2001, Vodafone Greece has been one of the 54 founding members of the GreenLight European program. This is a voluntary program where public and private organizations commit themselves to upgrading lighting efficiency at their building premises.

Today this specific practice has been extended to office space covering approximately 36,000 m<sup>2</sup> 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 purposes from all the above initiatives is over 40% in the applied areas.

**Idle Power Demand**

Since 2004 we have been taking the steps necessary to achieve power factor (cosφ) correction at the company's offices and switching centers (MTX) nationwide. The results of these steps have been that the power factor at offices and switching centers has improved significantly and is now close to unity (1). In 2013-2014, energy savings were 5,465 MWh (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.

\* Where the term 'per employee' is used, it corresponds to the average number employees in the examined financial year. In 2013-2014, the number of external employees working at the company's offices was also taken into account.



Lead batteries



### Cooling/Heating energy savings

In 2013-2014 we carried out the complete re-design of the Kifissos offices' building air conditioning system and replacement of the old equipment with new technology air conditioning units, aiming at saving up cooling/heating energy at office buildings. The program's pilot phase was implemented in Kifissos, resulting in saving up 148 MWh per annum and corresponding prevention of 146 tons of CO<sub>2</sub> from being emitted.

#### 2013-2014 objective

3% reduction in energy consumption per m<sup>2</sup> at offices.

#### 2013-2014 result

7.3% reduction in energy consumption per m<sup>2</sup> at offices.

#### Degree of success

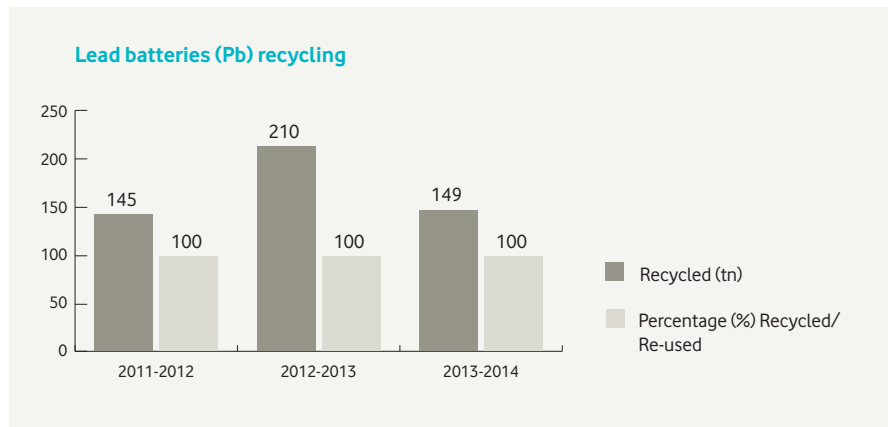
243%

#### ► 2014-2015 objective

2% reduction in energy consumption per m<sup>2</sup> at offices.

### Natural gas usage

In 2012-2013 we connected Chalandri office building to the natural gas network, thus substituting diesel use for heating purposes. The environmental benefit from this initiative is important since in 2013-2014 we prevented the emission of more than 36 tons of CO<sub>2</sub> into the atmosphere, while reducing by about 34% the CO<sub>2</sub> emissions that would be emitted if diesel was used for the same purpose.



### Recycling lead batteries

In 2013-2014, we recycled via approved battery recycling bodies, 149 tons of lead batteries, which accounts for the 100% of the batteries stored in our warehouse.

#### 2013-2014 objective

100% recycling of stored lead batteries.

#### 2013-2014 result

100% recycling of stored lead batteries (149 tons).

#### Degree of success

100%

#### ► 2014-2015 objective

100% recycling of stored lead batteries.

### Recycling waste oils

During 2013-2014, 24,706 lt of waste oil collected from base stations, MTXs and office buildings were sent for recycling via an authorised waste oil collection and recycling scheme. The hybrid and photovoltaic operation with batteries of the generator-powered base stations (see page 52) reduces the operating hours of the generators, which results in respective reduction of the amount of waste oils that are produced; As a result, we avoided production of 12,500 lt of waste oil for the 2013-2014 period. This approach results in reduction in time of the waste oil quantities collected from base stations that are sent for recycling.

**2013-2014 objective**

Recycling of 100% of waste oils collected from Base Stations.

**2013-2014 result**

1. Recycling of 100% of waste oils collected from Base Stations.
2. Production of 12,500 lt of waste oil was prevented at gen-powered base stations where hybrid operation using batteries was applied.

**Degree of success**

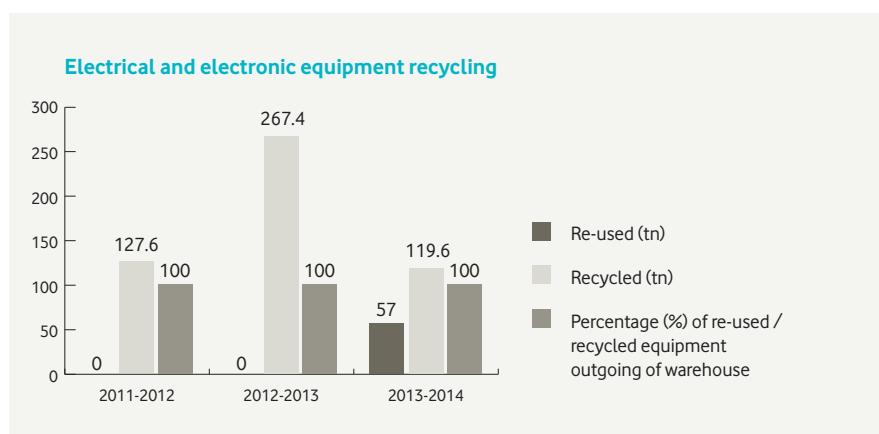
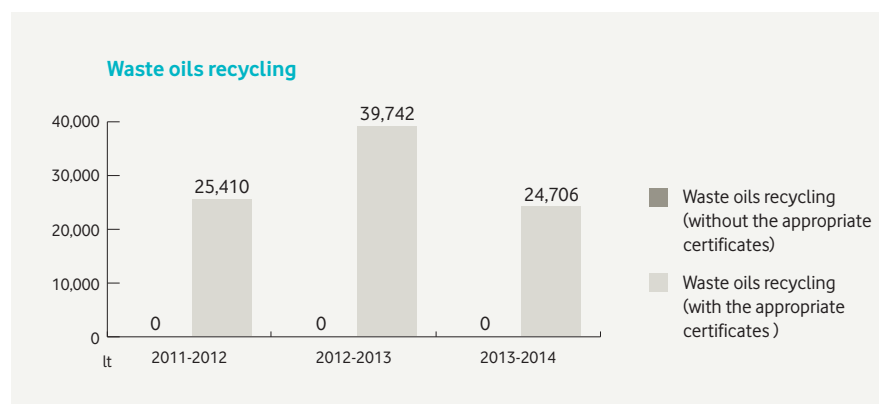
100%

**► 2014-2015 objective**

Recycling of 100% of waste oils collected from Base Stations.

## Recycling electrical and electronic equipment

At Vodafone Greece we send telecommunications equipment, computers, printers and monitors for recycling, in cooperation with the approved waste electrical and electronic equipment recycling body. In this way we are eliminating the environmental impact of heavy metals such as lead, zinc and cadmium disposed to landfills. In 2013-2014 we sent for recycling more than 119.6 tons of electrical and electronic equipment (including used light bulbs) and we re-used additionally 57 tons, corresponding to 100% of the old equipment of the company's network and office buildings.



The program has included light bulbs recycling since 2008-2009. Special collection bins have been placed in the company office buildings and MTXs to collect bulbs from building maintenance works and send them for recycling. Collection bins have also been placed at office buildings for company employees to be able to recycle the light bulbs they use at home. In 2013-2014 we sent 260 kilograms of used light bulbs for recycling.

Since 2008-2009 special collection bins have been placed at 11 of the company's buildings in Attica, Thessaloniki, Larisa, Patra and Heraklion to collect small household electrical and electronic devices. Company employees can now recycle small household electronic and electrical devices that they don't use anymore. In 2013-2014 we sent 4.9 tons of small household electronic and electrical devices for recycling.

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



### 2013-2014 objective

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

### 2013-2014 result

1. 100% of electrical and electronic equipment leaving our warehouse was re-used and recycled.
2. 4.9 tons of small household electronic and electrical devices were recycled.

### Degree of success

100%

### ► 2014-2015 objective

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

## Recycling paper and toners

At Vodafone Greece, we implement recycling programs for waste paper and empty toners.

During 2013-2014:

- 88.43 tons of paper (71.92 tons of office paper from Attica buildings, 16.51 tons of advertising leaflets) were sent for recycling, saving more than 1,150 trees
- 816 toners were sent for recycling,

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

### 2013-2014 objective

1. Maintain paper recycling percentage per employee in line with 2011-2012 results (22.2 kgr per employee).
2. 60% recycling of used toners.

### 2013-2014 result

1. 46% increase in paper recycling per employee in comparison with 2011-2012 results (32.4 kgr per employee).
2. 38.1% of used toners were recycled.

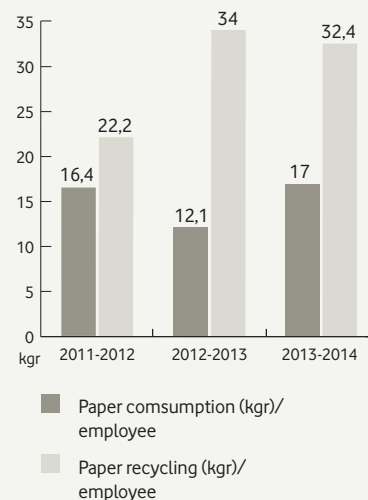
### Degree of success

1. 146%
2. 64%

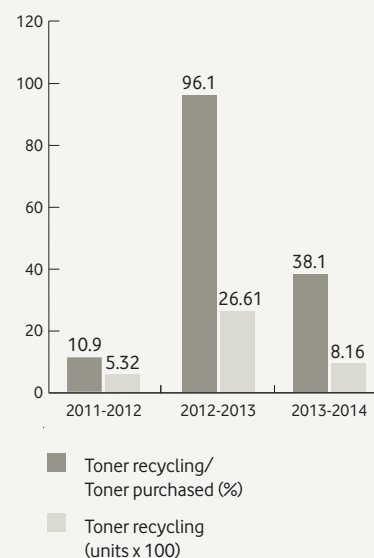
### ► 2014-2015 objective

1. Maintain paper recycling percentage per employee in line with 2013-2014 results (32.4 kgr per employee).
2. 60% recycling of used toners.

### Paper use and recycling



### Toners recycling



Mobile phones, accessories and household batteries collection bin



## Mobile phones, batteries and accessories recycling program

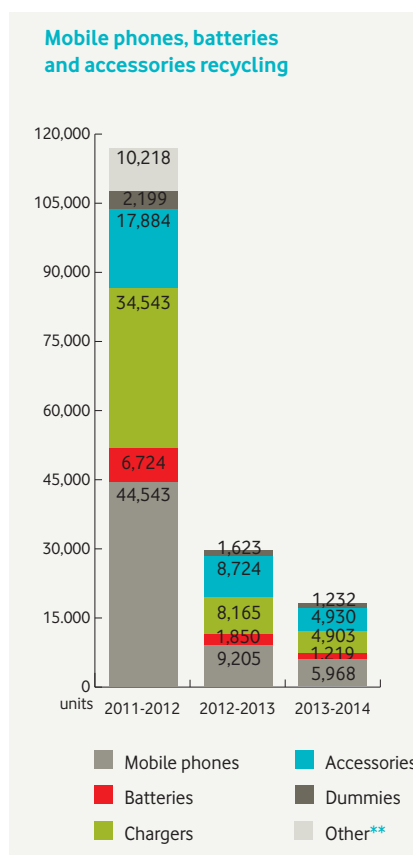
In June 2003 Vodafone Greece was the first telecommunications company to implement a nationwide mobile phones, batteries and accessories recycling program. In 2013-2014 more than 18,000\* mobile communications products were collected at around 1,000 special bins placed at Vodafone shops and company buildings across Greece, at all scouts of Greece branches and at 150 Vodafone business customers.

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

Furthermore, after cleaning our warehouses, more than 65,900 mobile and fixed communications products were collected and sent for recycling.

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

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



Although the program runs for the 11th consecutive year, public participation is not proportionally in line with mobile phones and accessories sales. According to the available data, in 2013-2014, only 1.2% of the mobile phones sold by Vodafone shops were collected for recycling at our shops and company buildings.

To enhance public and company employees awareness, in 2013-2014 we took the following steps:

- By March 2014, 150 business customers had placed 204 Vodafone collection bins at their premises for the collection of mobile phones & accessories.
- In cooperation with sport clubs, over the last years we placed collection bins at selected areas of their football grounds and also took a series of steps to promote the program.
- We continued public awareness and training regarding recycling of mobile phone materials, via relevant print inserts.

### 2013-2014 objective

Collect 30,000 mobile phones and accessories.

### 2013-2014 result

18,252 mobile phones and accessories were collected.

### Degree of success

61 %

### ► 2014-2015 objective

Collect 20,000 mobile phones and accessories.\*\*

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

\*\* The word "accessories" refers to all mobile communications items – besides mobile phones – which are included in the relevant chart. The word "other" refers to items – besides mobile telecommunication equipment – that were collected during the recycling events in collaboration with SKAI Group and were sent for recycling. These mainly include laptops, modems and other fixed telephony and internet equipment and accessories.

Mobile phones, accessories  
and household batteries collection bin



## Household batteries recycling program

The household batteries recycling program commenced on a pilot basis at the company's 4 central buildings in July 2004 and was extended in November 2005 to all Vodafone Greece shops and the company's buildings. The program is jointly implemented with the approved body AFIS. In 2013-2014 we sent for recycling more than 7.2 tons of used household batteries (around 241,000 batteries).

### 2013-2014 objective

Collect 8 tons of used household batteries (around 266,600 batteries).

### 2013-2014 result

7.2 tons of used household batteries were collected (around 241,000 batteries).

### Degree of success

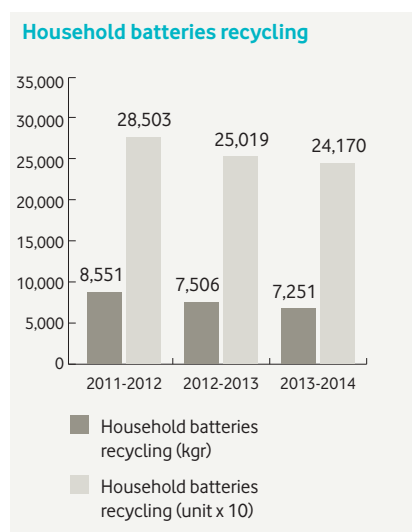
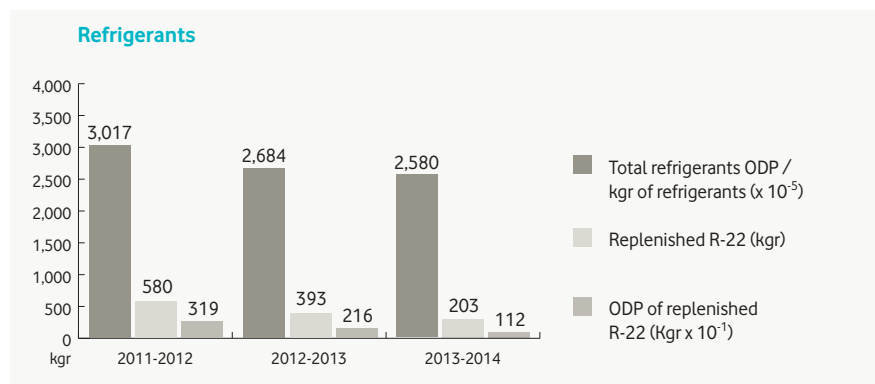
90%

### ► 2014-2015 objective

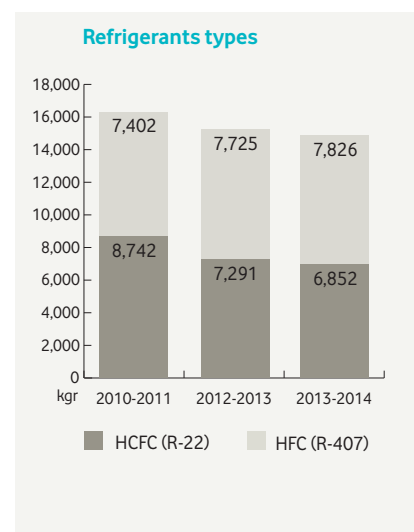
Collect 8 tons of used household batteries (around 266,600 batteries).

## Using more environmentally-friendly refrigerants and fire suppressants

At Vodafone Greece we only use fire suppressants with zero Ozone Depletion Potential (ODP), while as part of our scheduled maintenance activities, we gradually replace old refrigerant systems that operate with HCFC R-22 with new ones operating with zero ODP refrigerants. In 2013-2014 the total installed quantity of HCFC R-22 (a substance contributing to ozone layer depletion) reduced by 6%, while at the same time the overall ODP indicator reduced by 4% as to last year's respective period. As a result of



our efforts, the number of refrigerant systems operating with HCFC R-22 decreased and therefore malfunctions decreased, leading to a 48% decrease in the quantity of R-22 replenished.



### 2013-2014 objective

5% reduction in the ODP indicator for refrigerant systems.

### 2013-2014 result

4% reduction in the ODP indicator for refrigerant systems.

### Degree of success

80%

### ► 2014-2015 objective

5% reduction in the ODP indicator for refrigerant systems.

## Reducing paper consumption

At Vodafone Greece we implement a program that aims to reduce paper consumption for the company's daily needs. Over recent years the company has modified most of its computer software so that all the employees that use computers in their day-to-day work, can print two or more pages on one sheet of paper. However, in 2013-2014, printing paper use (A4 and A3) per employee was increased by 41% (mainly due to the fact that there was an increase in the number of external employees working in our offices whose everyday job demands increased use of printing paper).

Furthermore, since September 2007, all payslips have been available to Vodafone Greece employees exclusively in electronic format.

In order to drastically reduce the amount of paper used in printing bills, in February 2009 Vodafone Greece stopped sending out full analyses of calls to all post-pay numbers held by company employees, while in September 2010 the company completely stopped sending out such bills. All company employees have access to the particulars of their bill and a full analysis can instead be viewed online through the "e-bill" (see "My Account" on [vodafone.gr](http://vodafone.gr)). This initiative has resulted in 324 kilos of paper saving per year, which is translated into around 6 trees per year, while the percentage of the employees participating in the program is 75%.

Since July 2009, the company stopped sending full analysis of calls to retail customers, while since November 2010, the company extended the initiative to business customers too. The percentage of customers participation in the program is 92%, resulting in paper saving of more than 139 tons per year, which corresponds to saving of more than 2,360 trees per year.

Since April 2013, the company offers the "My e-bill" service, allowing all subscribers to electronically receive their bill only, via email, and not receive any bill in paper form. The subscribers' participation rate (individual and business) in the "My e-bill" service has reached 9% and annual paper savings amount to 9.4 tons, which correspond to approximately 160 trees per year.

### 2013-2014 objective

Maintain paper use for printing purposes per employee in line with 2012-2013 (12 kgr of paper per employee).

### 2013-2014 result

41% increase in paper use per employee compared to 2012-2013 (17 kgr of paper per employee).

### Degree of success

0%

### ► 2014-2015 objective

Maintain paper use for printing purposes per employee in line with 2013-2014 (17 kgr of paper per employee).

## Monitoring the environmental impacts of transport

Based on available data, fuel consumption\* by company's corporate fleet of vehicles dropped by 29% over the last year. In 2013-2014 air miles traveled on business were reduced by 13.5%\*\*. Since 2008, Vodafone has invested in developing video-conferencing infrastructure, while in 2013 the Lync Online service (see page xx) was made available to our employees, allowing them to make online videoconferences wherever they are through a simple Internet access. Vodafone promotes teleconferences and invests in relevant infrastructure to replace the need for travelling by air on business, aiming to reduce CO<sub>2</sub> emissions from air travelling.

Moreover, with the aim to reduce direct CO<sub>2</sub> emissions from the use of company vehicles, we adopted, in Vodafone, in 2012, a policy of leasing exclusively diesel and downsized vehicles. Since early 2012, when legislation permitted circulation of diesel vehicles in Attica and Thessaloniki, we are gradually replacing our fleet's petrol vehicles with smaller diesel cars and our target is to have fully replaced our existing fleet by March 2016. In 2012-2013, 26% of our company fleet was replaced by diesel vehicles, achieving a CO<sub>2</sub> emissions average of 137 grams per kilometer from the total of our vehicles. In 2013-2014 we increased diesel vehicles to 71% of the fleet, further reducing the average of CO<sub>2</sub> emissions to 116 gr per km.

\*

Data on fuel consumption pertain to the use of special consumption cards by company executives and senior management.

\*\*

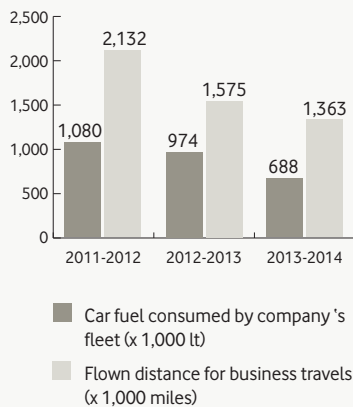
Data refers to the total of domestic and international trips since company has developed a central system to record and monitor all flights.





Vodafone Eco-rating

### Transports



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 impact assessment of our operation.

#### 2013-2014 result

1. 29% reduction in fuel consumption from company vehicles.
2. 13.5% reduction in air miles traveled.

#### 2014-2015 objective

1. The average CO<sub>2</sub> emission for new cars in the company's fleet, over the last 12 month period, won't exceed 130 gr CO<sub>2</sub> per km.
2. Replace 100% of petrol vehicles of company's fleet by diesel vehicles by March 2016.


## We promote environmentally friendly products and services

In July 2013, Vodafone innovated and launched Vodafone Eco-rating, a mobile phone rating program, allowing customers to choose the mobile phone they wish to buy according to environmental and social criteria too. Each mobile phone is rated depending on how friendly to the environment it is, on the basis of specific criteria, from 1 to 5, with 5 being the highest rate. If a mobile phone has no rate, this is labelled accordingly, meaning that either the required data is not yet available or the manufacturer has decided not to participate in the rating process. The mobile phones ratings are available, along with the rest of the device's specifications, at Vodafone shops, as well as online, on the e-shop of [vodafone.gr](http://vodafone.gr) ([vodafone.gr/eco-rating](http://vodafone.gr/eco-rating)).

The aim of the program is to motivate mobile phones manufacturers to design and produce more and more environmentally friendly mobile phones. The assessment is carried out by independent agencies which are specialised in environmental and social certifications. The rates are attributed based on the mobile phones manufacturers' answers to an extensive questionnaire that covers information regarding the mobile phones' environmental impact throughout their life cycle, as well as based on the manufacturer's responsible management of their environmental and social impact resulting from their operation.

The assessment includes the following three key areas:

- Green design: whether a mobile phone has features that improve its environmental impact; for example, if it is made from recycled plastic and metals or if it is free from dangerous chemicals.
- Life cycle of mobile phone: this is about assessing the impact of the mobile phone on the environment, in all stages of its life, from mining of raw materials that are used in the production stage of the phone and its parts, till use by consumers and final disposal at the end of its life cycle.
- Manufacturer's environmental and social performance: this is about assessing the manufacturer's commitment to responsibly manage the environmental and social impact resulting from their operation; for example, proper management of waste deriving from production processes or safeguarding their employees' health and safety.



## Contribution to Sustainable Societies

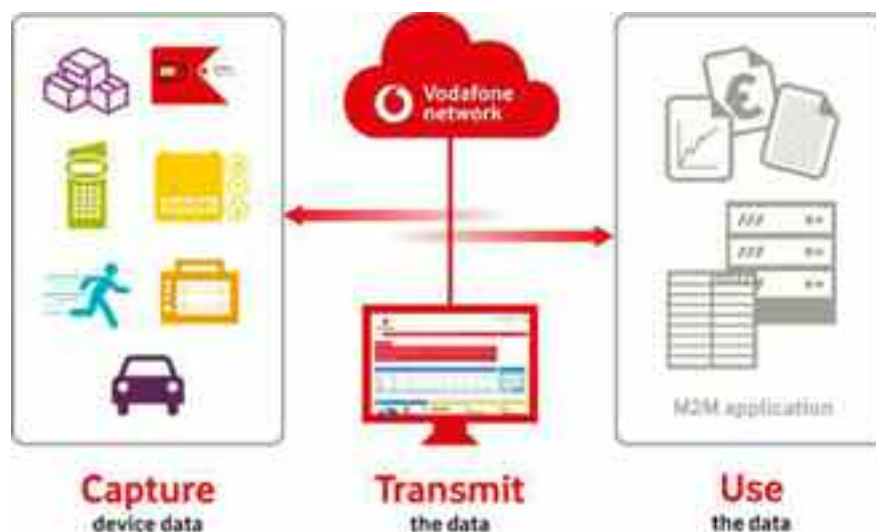
**The company's future is intimately bound up with the challenges that sustainable development presents. We are focusing on sectors where our mobile technology solutions can help ensure equal access to communications, support the Greek economy, address challenges at an economic, social and environmental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

## Supporting the Greek economy and contributing in the development and competitiveness of the Greek businesses, with parallel benefits for the environment

### Offering the Microsoft Office 365 service

As a strategic associate of Microsoft around the globe, Vodafone offers the Office 365 service which is an integrated suite of productivity applications such as Exchange Email, SharePoint workspace, Office tools and video conference tool through the Lync Online service. Office 365 combines cloud technologies with Microsoft's most popular tools allowing every company to work in a modern way with minimal cost by utilising the internet and Vodafone's telecommunications infrastructure.

The Lync Online service allows users to communicate with their associates and customers in a direct, effective way, wherever they are, just by hosting web video conferences with the aid of an ordinary internet connection. This service reduces the need to travel to hold business meetings, thereby resulting in a drop in the fuel consumption for business trips and a corresponding drop in CO<sub>2</sub> emissions into the environment.



### Offering the ZeliTrack fleet management service

The ZeliTrack service is a simple-to-use subscriber Web Fleet Management service available exclusively from Vodafone Greece. The special device installed on the vehicle constantly records the geographical coordinates and transmits the data via Vodafone Greece mobile telecommunications network 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 corporate 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.



"Vodafone Explore Greece" application

### Offering telemetering and surveillance of photovoltaic facilities using SmartEcometer PV

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

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

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

### Offering a natural gas consumption checking system SmartEcometer GAS

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

- control over natural gas consumption levels from anywhere, any time of the day via the internet and info-SMS.
- estimates of the cost of consumption
- the option to view consumption data per day, hour, month, or any selected time period, in the form of diagrams or reports showing m3 or KWh.
- the option to view maximum values and consumption averages for each time period
- the option to compare data from previous consumption periods (if telemetering was available then)
- updates via sms or email, if consumption goes outside of expected levels in any period
- updates by email about consumption levels that go over the monthly limit set by the consumer
- updates about the price of natural gas each month
- option to view CO<sub>2</sub> reductions achieved by using natural gas compared to the use of oil

Subscribers to this service are given adequate information in good time about any problems in how the system operates and can also properly plan their consumption, thereby avoiding unwanted costs and pointless energy consumption as well as CO<sub>2</sub> emissions to the environment.

## Utilising our technology for the support of the Greek economy and the local communities

### We support greek tourism through the Vodafone Explore Greece app

Since 2012 Vodafone has developed and promoted an innovative application called Vodafone Explore Greece which is available to its global subscriber base. This application promotes Greece as a tourist destination thereby contributing to the growth of the Greek economy and supporting the local community.

The Vodafone Explore Greece application is available worldwide free of charge to smartphone and tablet owners worldwide. It supports 4 languages (Greek, English, German and Italian) and is compatible with Android and iOS operating systems.

This application is a useful travel guide for all Greece's most popular destinations, and helps visitors to Greece no matter what network they use or country they come from, travel the country and enjoy a more comfortable, straightforward and cost-effective stay.

It has a rich body of content and useful hints and tips about where to stay, what to do, cultural events and detailed maps while also highlighting Greece's natural beauty and the historical and cultural wealth of each area.

Especially for Vodafone subscribers from around the world travelling to Greece, they can benefit from exclusive offers like free entry to specific museums or preferential package rates including both flights and accommodation.

## Utilising our technology for equal access to communication

### Contributing to equal quality of life and access to communication for the visually-impaired

Vodafone Greece, in order to ensure equal access to its products and services for all, innovated once more in 2013-2014, offering the ground-breaking "Vodafone Speaking App" application, which is addressed to users with total loss of vision or serious vision problems.

The Vodafone Speaking App application is the first and unique text-to-speech conversion application for Android, offering correct reading out in greek of text messages (SMS), e-mail messages, Internet navigation, as well as telephone numbers from the list of contacts, calls, dates, etc. Moreover, the application correctly spells out in Greek content from useful applications, such as news feeds, entertainment, weather forecast, etc.

The application is available free of charge by Vodafone on Google Play for Vodafone tariff plan or prepay subscribers and it is compatible with Android smartphones and tablets running the Android version 2.3 and higher. Users of other networks have the possibility to try the application for one day per SIM card. During February and March 2014 the application was downloaded by 568 users.

The "Vodafone Speaking App" application fulfils smartphones and tablets users' modern needs and is an evolution of the "Vodafone Speaking Phone" service which was first launched in 2005.

### Offering the Speech Service on [www.vodafone.gr](http://www.vodafone.gr)

In March 2010 Vodafone Greece was the first mobile communications company in the country to offer all visitors to our website the option to use the Speech Service. The service reads out the content of specific pages on the Vodafone 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 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.

Vodafone Speaking App



### Handling requests from hearing-impaired customers

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 handsets to the Customer Service Department by text message (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.

### Offering special charges 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 message to any network.

'Voice Navigation Service'



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

For 7 consecutive years Vodafone Greece has been supporting www.blind.gr. This is an innovative information and communication hub for the visually impaired by Greek standards, 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 the association. 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 phones and fixed phones (from 210-5226600). Moreover, it offers:

- ▮ 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 dialing 210 5226600 and allows disabled individuals to directly access information from numerous sources. This tool reads the full text content of info-portals, newspapers, blogs and other websites in real time using RSS WebRhetor Feed. Websites that provide RSS feeds (or decide in the future to provide such feeds) can join this service free of charge simply by contacting STAT, thereby enriching their website with an additional tool that offers alternative access to all.
- ▮ 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.
- ▮ 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).

The blind.gr portal remains an important information hub via which all recognised blind associations in Greece and Cyprus can upload posts to notify their members. The number of hits is steadily growing with the figure reaching 200,000 visits from the service commencement date until 31.3.2014. Over 3,000 voice calls are also made a month.

#### 2013-2014 objective

Retain existing products and services.

#### 2013-2014 result

Existing products and services were retained and a new application was launched.

#### Degree of success

100%

#### ► 2014-2015 objective

Retain existing products and services.





Telemedicine program

## Utilising our technology in the areas of health and education

### Vodafone Greece's Telemedicine program

In 2013-2014, Vodafone Greece's Telemedicine Program was extended to 100 remote and frontier locations across Greece:

1. In cooperation with the Athens Medical Center
2. Under the auspices of the Ministries of Health and Mercantile Marine and the Aegean
3. With the involvement of the Hellenic Healthy Cities Network, and the company Vidavo.

The Telemedicine Program utilises the unlimited capacities offered by Vodafone's network and the mobile communication technology and aims at improving the daily life of people living in the country's remote areas. It has allowed more than 500,000 residents of such areas to obtain access to high level specialised health services without leaving their place of residence.

Through the Vodafone Greece Telemedicine Program, residents of remote areas can visit the municipal/peripheral medical center and receive their medical examinations, such as electrocardiogram or spirometry, which are transferred, through Vodafone's network, to medical specialists at the Athens Medical Center. Medical specialists then offer their diagnosis and advice directly and fast, again using Vodafone Greece mobile communications network.

The Telemedicine Program supports general practitioners and peripheral doctors, while promoting preventive medicine. Moreover, it contributes to preventing illnesses through their timely diagnosis and it also covers patients with chronic diseases, since it gives them the possibility to systematically monitor their health status, at their place of residence, thus overcoming geographical or other limitations.

The Program's pilot phase began in 2006, covering 5 areas in Central Macedonia. In 2008, it was extended to 17 areas and in 2011 to 30 areas across Greece.

In 2013-2014 more than 7,900 medical examinations were sent from municipal/peripheral medical centers participating in the Program.

#### 2013-2014 objective

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

#### 2013-2014 result

The Telemedicine Program was extended to 100 points across all of Greece.

#### Degree of success

100%

#### ► 2014-2015 objective

Maintain the Telemedicine Program at 100 points across all of Greece and evaluate the inclusion new examinations.



Telemedicine program: Process of taking and sending examinations

Educational program  
"Click... on history"



## Click ... ON HISTORY

Working in collaboration with the Foundation for the Hellenic World, in 2010 Vodafone Greece developed the 'Click ... on history' educational program. This program was addressed to Secondary School level students and sought to highlight local history from the viewpoint of students and to make them more familiar with mobile communications technology as a contemporary tool of education.

More specifically, students were asked to record their local history using 'smart' mobile phones by utilising the camera, video and voice recorder functions.

This program brought an important contribution to students' education as far as research method is concerned, while it also helped them acquire skills regarding essay creation in electronic form through a process that is bound to have the students' attention. The program was implemented at 42 schools in various areas nationwide.

### 2013-2014 objective

Evaluate continuation of the program.

### 2013-2014 result

The program was completed.

### Degree of success

100%

## Supporting initiatives for the common good

### The "Prosfero" Service

In February 2006 the three mobile communications companies Cosmote, Wind and Vodafone Greece set up the "Prosfero" service to support and provide integrated management for charitable events like TV-marathons. This service allows certain 5-digit numbers to be used to be used by the non-governmental charitable organisations. 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 communications 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 17 actions were implemented to raise funds for charitable bodies.

### 2013-2014 objective

Continue the program.

### 2013-2014 result

11 organisations were supported.

### Degree of success

100%

### ► 2014-2015 objective

Continue the program.

### Free of charge 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 2013-2014, the following lines received more than 71,150 calls.

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

Mobile pediatrics and dentistry unit



At the same time, in 2013-2014 more than 2,990,000 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 European Emergency Number (112)

Furthermore, in alignment with our legislation related to 112 Emergency Number, in 2011 Vodafone Greece processed 105 requests from General Secretariat for Civil Protection. In particular, the General Secretariat for Civil Protection asked from Vodafone Greece to locate mobile communication users in danger. The average response time for those cases were covered by the Vodafone Greece network was 25 minutes. For the cases where the user was not served by Vodafone Greece network, the response time for the response is 35 minutes. The above timeframes include the necessary and mandatory preparation of the required forms and always there is telephone communication/briefing with the Authority. These requests are confirmed cases where the mobile subscriber is in danger and there is a demand for tracking through mobile phone.

#### 2013-2014 objective

Retain the existing social support lines and evaluate the possibility to provide more free calls to social support lines.

#### 2013-2014 result

Existing social support lines were retained and a new emergency number 1024 was added free of charge for Attiki Odos (replacing former 1866).

#### Degree of success

100%

#### ► 2014-2015 objective

Retain the existing social support lines.

## Programs in cooperation with respectful institutions that meet direct contemporary needs of today's society

### Mobile pediatrics and dentistry unit

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

- ✧ pediatric examination, treatment, dental examination and follow up
- ✧ drug treatment with basic pediatric drug provision
- ✧ preventative health care and hygiene guidelines
- ✧ implementation of vaccination programs to children lacking insurance



SOS Villages bag

Bearing in mind that large urban centers have higher primary medical care needs (based on the experience of Mediciens du Monde) in the period September 2012-March 2014 a total of 25 2-day events were held in the Attica and Thessaloniki regions with the involvement of SKAI, so that even more children could be briefed and receive care from the mobile unit. A total of 4,176 children were examined as part of those 25 events.

#### 2013-2014 objective

Continue the program.

#### 2013-2014 result

25 2-day events were held in the Attica and Thessaloniki regions.

#### Degree of success

100%

#### ► 2014-2015 objective

Organise 15 2-day events in rural areas.

### 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 Children's 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 theater workshop
- ✧ A dance workshop
- ✧ A new technologies workshop

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

- ✧ A music workshop
- ✧ A visual arts workshop
- ✧ A theater workshop
- ✧ An environmental awareness workshop

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

The bag was 100% cotton and was on sale from December 2011 at Vodafone shops, as well as on [www.vodafone.gr](http://www.vodafone.gr) at €2.90 and all revenues from sales of the bags went to support the educational and pedagogical programs run by SOS Children's Villages. The bag featured paintings done by children from the SOS Children's Villages who took part in the visual arts workshop.

#### 2013-2014 objective

Re-evaluate and change the workshops to meet children's needs and to match available resources.

#### 2013-2014 result

The workshops were re-evaluated to meet children's needs.

#### Degree of success

100%

#### ► 2014-2015 objective

Maintain 8 workshops in Athens and Thessaloniki.



Vodafone World of Difference

## Donation of material and technical equipment

With the aim to meet society's direct contemporary substantial needs and responding to relevant requests, in 2013-2014 we implemented a series of donations in material and technical equipment, thus supporting the operation of 25 schools across the entire country, as well as 2 Non-Governmental Organisations. More specifically, we donated laptops, copiers, SWITCH networking equipment, desks, office seats, lockers, cabinets and cloth racks. This is company equipment that has been withdrawn in the framework of our buildings restructuring, as well as of our electronic equipment renewal.

## Vodafone World of Difference program

In September 2010 we implemented the Vodafone World of Difference program which gives individuals with vision and passion the opportunity to make their dream come true and work for the charity of their choice on one specific project. This is a global program that has been implemented so far in 19 countries with great success, and has given the opportunity to more than 3,025 individual winners around the world to work for a charitable organization of their choice.

In 2013, during the fourth round of the program, during the 4-week application submission period, we received 242 applications from the public. 10 candidates were eventually chosen to work for six months (January-July) at a charity of their choosing meeting society's substantial needs. More specifically:

- ✧ Ms Fotini Avdelli, works as Librarian at the "Network for the Child's Rights". Her goal is to increase the Network's existing library collection, as well as the number of its members, and give children the opportunity to love books through a properly organised lending library.
- ✧ Mr. Giorgos Arapoglou, is Responsible for the management of the "Schedia" street magazine vendors network at "Diogenis NGO". His goal is to extend the magazine's network of vendors and ensure income for people from vulnerable social groups.
- ✧ Mr. Nagi El Kahout is Responsible for the management of Raw materials and Meal preparation at the "Bread - Action" Panhellenic Charitable association. His goal is to increase the daily meal production to meet the needs of poor families and people.
- ✧ Mr. Fanis Lekkas, works as Coordinator of Shelter for the Homeless Program at the Civil Non profit "Human – People" organisation. His goal is to secure accommodation and food for families in need, as well as job opportunities for them.
- ✧ Mr. Constantinos Bouyouris, works as Organic Cultivation Agronomist at the "International Biopolitics Organisation". His goal is to train people with financial problems cover a part of their daily nutritional needs, by growing organic vegetables at their own space.
- ✧ Ms Marilia Paraschaki, is a Social Worker at the "Aghioi Theodoroi" Association for People with mental disabilities of the Prefecture of Rhodopi. Her goal is to help people with mental disabilities acquire the necessary tools, in order to autonomously cope with their daily needs, at the Home of Assisted living, currently being built by the Association.
- ✧ Ms Maria Skiada, is a Social Worker at the "IKE - Hadjipaterio Rehabilitation Centre of Spastic Children". Her goal is to support the children and their families who find shelter at the Centre.
- ✧ Ms Annie Skourleti, is Responsible for Training and Internet platform content management, at the "Desmos" Association. Her main goal is to make the Internet platform available to charitable organisations, so that they may have access to goods offered as donation by companies and individuals alike.
- ✧ Ms Katerina Tsakmaki, is a Social Worker at the "Women's Shelter" Support Centre for abused women. Her goal is to provide support to women who have suffered abuse and information on services and structures, where they can turn to.
- ✧ Ms Constantina Psallida, is a Work Counselor with the Employment Promotion Agency at "PRAKSIS". Her goal is to offer service and support to vulnerable groups in seeking job opportunities.

In 2012, during the third round of the program, during the 6-week application submission period, we received 242 applications from the public. 5 candidates were eventually chosen to work for one year at a charity of their choosing in the 2013-2014 period. They were:

- ▮ Paraskevi Vasiliadou took up the post of Elderly Support Program Manager at 'ARSIS' in Kozani in order to provide counseling in four sectors: Psychological support, social empowerment, day-to-day practical problem-solving and money saving. More specifically, throughout the year in the framework of the "Zoi Gemati" Seniors' support Program, Alzheimer's prevention workshops, a Painting and Constructions Workshop, a Therapeutic game Workshop were designed and became operational, as well as Strengthening of Social Skills Workshop to which participated a total of 113 persons.
- ▮ Mili Gialabouzi took up the special instructor post at the Greek Down's Syndrome Association in order to train individuals with Down's Syndrome how to read and write, to improve their social and communication skills and teach them how to look after themselves. More specifically, throughout the year a program of functional and social skills was implemented on 18 persons, as well as a program of communication skills on 30 persons from three different age groups.
- ▮ Zoe Lymberopoulou took up the post of Educational Programs Manager at the Museum of the City of Athens / Vourou –Evtaxia Foundation, to create educational programs for children and attract larger numbers of visitors to the museum. More specifically, throughout the year 4 training programs were designed and became operational, in which more than 2,900 children participated. Moreover, 2 leaflets were produced and distributed for free to the museum's visitors.
- ▮ Stavroula Ropi took up the post of psychologist with the phone counseling service run by the Association for the Psychosocial Health of Children and Adolescents (A.P.H.C.A) in order to increase the number of calls the association answers by 25% and to identify mental health problems in children and adolescents in good time and to provide immediate access to treatment. More specifically, throughout the year 1,159 telephone calls were answered on the service's both telephone lines out of 5,000 total calls, increasing the rate of received calls by the company's services by 24%.
- ▮ Evgenia Touriki is working as a psychologist at the Daycare Center for dementia patients at the Athens Alzheimer's & Related Disorders Association, in order to provide psychosocial support to patients via a continuous daily program of activities and to brief relatives and carers about dementia-related issues, the symptoms and progress of Alzheimer's disease, hereditary issues, practical issues about how to care for patients with Alzheimer's disease, etc. More specifically, in the framework of the program, 50 patients participated to groups of preventive therapy, while 79 individual and 129 telephone counselling sessions to patients' relatives were performed. Moreover, seminars for caregivers were carried out, accommodating 90 relatives and paid patient caregivers, who received 28 hours of training.

#### 2013-2014 objective

Evaluate program continuation.

#### 2013-2014 result

Program was evaluated to meet society's current needs through increase of candidates (from 5 to 10) and reduction of work period (6 months instead of 12).

#### Degree of success

100%

#### ► 2014-2015 objective

Repeat the program (10 candidates over a 6 month-period).





## Employee volunteerism initiatives

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. In this framework:

- ▮ We have collected -through the participation of all company employees – 3.5 tons of packaged foods to support the families staying at the Children and Family Support Centers of the SOS Children's Villages, which operate in 6 cities of Greece. In order to collect, sort out and distribute foods to 360 families, 60 volunteers from the company staff, dedicated a total of 239 hours from their work time.
- ▮ We have collected for the same cause - through the participation of all company employees – school supplies for 440 children. To contribute and sort out school supplies, 50 volunteers from the company staff, dedicated a total of 211 hours from their work time.
- ▮ We have created –to support the work of the SOS Children's Villages – 2,000 handmade Easter decorative items and Paschal candles, which were sold at Bazaars both at the company's headquarters, in Halandri, and at the Athens Metro Mall. To create and sell these objects, 100 Vodafone staff volunteers dedicated a total of 300 hours from their work time.

- ▮ For the fifth consecutive year, 4 employees represented Vodafone Greece in the charitable Global Biking Initiative, by cycling from Paris to Dusseldorf to disseminate information about the work of the SOS Children's Villages. The team's efforts raised 7,500€ for the Vari SOS Children's Village, from friends' and colleagues' donations.

Furthermore, the company's employees also stood by residents of Cephalonia who were stricken by the January 2014 earthquakes, by collecting first need items, such as blankets, bottled water and canned food. A total of 76 blankets, 2,097 liters of bottled water and 27 boxes of canned food were collected.

Since 2002 employees have been systematically involved in collecting clothes and offering them to charities such as Medecins du Monde, the Greek Red Cross, the Strofi Treatment Center, as well as individual families in the Municipality of Perama. During 2012-2013 around 12 hours were spent in implementing the scheme by a team of employees in the context of their day-to-day work while more than 500 items of clothing were distributed.

### Running a blood donation program

Since 1996, Vodafone has been implementing a blood donation program at company premises with the active involvement of employees. This voluntary blood donation program is run twice a year in cooperation with the Athens hospitals, Patissia General and Amalia Fleming, and the Thessaloniki hospital, Agios Pavlos. The resulting blood bank covers the needs of all our people and their close relatives. In 2013-2014 331 employees took part in the voluntary blood donation scheme and 155 blood units were used by employees and their family.

### 2013-2014 objective

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

### 2013-2014 result

1. The clothes collection program was continued.
2. The blood donation program was continued.
3. 5 employee volunteerism programs were run.

### Degree of success

1. 100%
2. 100%
3. 166%

### ► 2014-2015 objective

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

Managing Sustainability		
2013-2014 objective	2013-2014 result	► 2014-2015 objective
All cases of corruption reported via available communication channels will be investigated and drawn to the board's attention.	There were no reports for cases of corruption. ☉	■
Carry out the 5th Stakeholders Survey (2013-2015).	The 5th Stakeholders Survey survey was carried out. ☉	Carry out the 6th Stakeholders Survey.
Carry out the Employee Survey (2013-2015).	■	Carry out the Employee Survey on Sustainability programs.
Successful evaluation of the management systems by independent validation agencies.	Management systems successfully evaluated. ☉	Successful evaluation of the management systems by independent validation agencies.
Successful evaluation of the implementation of 6 high risk policies according to Vodafone Group requirements.	Overview of compliance on 6 high risk policies and identification of 9 areas that require improvement. ☉	1. Implement remediation actions in the areas that need improvement identified during 2013-2014. 2. Evaluate the 100% of the control mechanisms for 7 high risk policies.
Check proper implementation and application of corporate processes and checks which safeguard: a) the correctness of financial results and b) company revenues.	Successful assurance of proper implementation and application of corporate processes and checks, including corrective actions and changes that were required. ☉	Successful assurance of proper implementation and application of corporate processes and checks, which safeguard: a) the correctness of financial results and b) company revenues as well as sign off of the Entity Certification Form by the CEO and the CFO.
Successfully obtain validation from independent auditors, who will certify the company's compliance with the requirements of Section 404 of the Sarbanes-Oxley Act.	Validation of company's compliance (comments for improvement were included but these have no impact whatsoever on the financial results) by independent internal and external company auditors, in accordance with the requirements of section 404 of the Sarbanes-Oxley Act. ☉	Successfully obtain validation from independent auditors, who will certify the company's compliance with the requirements of Section 404 of the Sarbanes-Oxley Act.
Continue compliance with the ISO 22301:2012 standard.	Successful compliance of the Business Continuity Management System in line with ISO 22301:2012 standard by the certification body Lloyd's Register Quality Assurance. ☉	1. Successful audit for the implementation of the Business Continuity Management System by an independent certification body. 2. Successful completion of 80% of the annual plan to test business continuity plans
■	■	Repeat the "Doing What's Right" internal communications campaign.
☉ <b>Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 89-91, Assurance Report).</b>		

## Responsible Behaviour

### Mobile Phones – Masts – Health – Network Deployment

#### 2013-2014 objective

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

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

Provide support for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the 'HERMES' program to 2 new locations.

Evaluation the continuation of the ENIGMA program.

Provide support to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 2 new areas.

#### 2013-2014 result

Given that a workshop took place in 2012-2013 and there were no significant changes in 2013-2014 regarding human resources involved in the network deployment and operation, nor in related policies, a new workshop was not organised. ☺

Issues were communicated. ☺

Extended the 'HERMES' program to 2 new locations. ☺

The continuation of the ENIGMA program was evaluated and it was decided that it should be terminated since it has achieved its objective. ☺

Conducted measurements via the 'Mobile HERMES' program, in 2 new areas. ☺

#### ► 2014-2015 objective

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

Communicate issues of mobile communications, technology and health based on scientific developments.

Provide support for the activities of the National Technical University of Athens and the Aristotle University of Thessaloniki to extend the 'HERMES' program to 3 new locations.

■

Provide support to the Aristotle University of Thessaloniki to conduct measurements via the 'Mobile HERMES' program, in 3 new areas.

#### Customers

Check marketing materials in relation to the revised guidelines.

Continue to provide information (advice on the use of mobile phones while driving)

Inform public about Sustainability issues via articles.

Vodafone Greece's marketing materials were checked. No non-conformities were found. ☺

Continued provision of information. ☺

Continue to provide information. ☺

Check marketing materials in relation to the guidelines.

Continue to provide information.

Inform public about Sustainability issues via relevant articles.

#### Safe internet usage by children and teenagers

Leaflet distribution (parents guide).

Hold bsafeonline info-events in 8 cities nationwide.

Vodafone Mobile Broadband/tablets filter development.

Leaflet was distributed. ☺

bsafeonline info-events organised in 2 cities nationwide. (due to different internal priorities, holding info events in 8 cities was not possible). ☺

Filter for Vodafone Mobile Broadband/tablets was developed. ☺

Leaflet distribution.

Hold bsafeonline info-events in 4 cities nationwide.

Information of subscribers on Vodafone Mobile Broadband/tablets filter availability.



**Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 89-91, Assurance Report).**

## Responsible Behaviour (continue)

## Supply Chain

## 2013-2014 objective

1. Complete the process of issuing and approving the updated Code of Ethical Purchasing in the Greek language, via company's corporate documentation system.
2. Incorporate the updated Code of Ethical Purchasing into all contracts with the company's suppliers.
3. Promote Vodafone Code of Conduct to company's contractors, whose responsibilities relate to the deployment of company's network and its operation.

## 2013-2014 result

1. Completion of process of issuing and approving the updated Code of Ethical Purchasing in the Greek language, via company's corporate documentation system. ☉
2. Incorporation of updated Code of Ethical Purchasing into 79% of contracts with the company's suppliers. ☉
3. Incorporation of Vodafone Code of Conduct into contracts with the company's contractors whose responsibilities relate to the deployment of the company's network and its operation. ☉

## ► 2014-2015 objective

1. Update existing Code of Ethical Purchasing in order to enhance environmental standards and incorporate requirements for bribery and corruption prevention.
2. Incorporate Vodafone Code of Conduct into all contracts with the company's new suppliers, whose responsibilities relate to the deployment of company's network and its operation.

## Employees

Design the 'Inspire to Change' program and run the program for all shop managers.

Continue cross-functional projects.

Continue the Skills Development Center for the Enterprise Business Unit and Consumer Business Unit.

Design and develop a skills development center for Commercial Operations Division.

Continue the recognition programs 'Make a Difference' and 'The Vodafone Way Global Heroes'.

Run mentoring programs and workshops with emphasis on developing leadership skills for company executives.

Design and implement the program to all Vodafone shop managers. ☉

Cross-functional projects continued to be implemented. ☉

The programs for the Enterprise Business Unit and Consumer Business Unit continued. ☉

The specific courses were not held because of other project prioritisation. ☉

The recognition programs were continued. ☉

Mentoring programs and workshops with emphasis on developing leadership skills for company executives were carried out. ☉

Curry out the Employee Survey.

Implement "Leading in the Vodafone Way" and "First Time Line Manager" programs to the company's managerial staff.

Continue the "Skills development center" program for the Enterprise Business Unit and Consumer Business Unit.

Redesign and implementation of training programs for new recruited employees of the Commercial departments.

Continue 2 recognition and rewarding programs.

Continue Mentoring and workshops programs with emphasis on development of managers' leading skills.

Create of commercial culture for 100% of employees through the "Commercial Mentality" program.

Implement the new "Vodafone Way of Retail" training program on shops employees.

Continue the Marketing Academy program for all employees of the marketing departments.

Implement the "Vodafone Way of Selling" program on corporate sales employees.



Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 89-91, Assurance Report).

## Responsible Behaviour ( continue)

### 2013-2014 objective

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

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

Continuation of the Discover Graduate Program with the goal of recruiting 10 postgraduate students who have or are about to complete their studies.

No increase in workplace accidents compared to 2012-2013.

Develop and run an e-learning program about occupational health and safety issues for 35% of employees.

### 2013-2014 result

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

Continue to bolster the corporate culture. ☉

11 postgraduate students were recruited. ☉

No increase in workplace accidents. ☉

e-learning program followed by 58% of employees. ☉

### ► 2014-2015 objective

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

Continue to bolster the corporate culture "The Vodafone Way" for 100% of employees.

Continuation of the 'Discover Graduate Program' with the goal of recruiting 11 postgraduate students or/and alumni.

No increase in workplace accidents compared to 2013-2014.

Develop and run an e-learning program about occupational health and safety issues for 90% of employees.

## Eco-Efficiency

Prevent the emission of 50,000 tons of CO<sub>2</sub>.

Reduce, by 2020, CO<sub>2</sub> emissions by 50% against a 2006-2007 baseline (this is a Vodafone Group overall commitment).

Integration of photovoltaic systems at extra 30 base stations in order to implement the combined operation of photovoltaic and hybrid schemes.

47% savings in network energy consumption.

3% reduction in energy consumption per m<sup>2</sup> at offices.

100% recycling of stored lead batteries.

The emission of 50,933 tons of CO<sub>2</sub> was prevented. ☉

■

Photovoltaic systems were integrated at 38 more base stations in order to implement the combined operation of photovoltaic and hybrid schemes. ☉

50% savings in network energy consumption (this represents 34.444 MWh energy saving at Base Stations and 8.892 MWh at MTXs/DataCenters). ☉

7.3% reduction in energy consumption per m<sup>2</sup> at offices. ☉

100% recycling of stored lead batteries (149 tons). ☉

Prevent the emission of 51,000 tons of CO<sub>2</sub>

Reduce, by 2020, CO<sub>2</sub> emissions by 50% against a 2006-2007 baseline (this is a Vodafone Group overall commitment).

Transfer of photovoltaic systems from base stations that were connected to the power grid to 10 more base stations, which are powered by generators in order to implement the combined operation of photovoltaic and hybrid schemes.

51% savings in network energy consumption.

2% reduction in energy consumption per m<sup>2</sup> at offices.

100% recycling of stored lead batteries.



Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 89-91, Assurance Report).

## Eco-Efficiency (continue)

**2013-2014 objective**

Recycling of 100% of waste oils collected 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 2011-2012 results (26.6 kgr per employee).

60% recycling of used toners.

Collect 30,000 mobile phones and accessories.

Collect 8 tons of used household batteries (around 266,600 batteries).

5% reduction in the ODP indicator for refrigerant systems.

Maintain paper use for printing purposes per employee in line with 2012-2013 (14 kgr of paper per employee).

■

**2013-2014 result**

1. Recycling of 100% of waste oils collected from Base Stations. ☉
2. Production of 12,500 lt of waste oil was prevented at gen-powered base stations where hybrid operation using. ☉

1. 100% of electrical and electronic equipment leaving our warehouse was re-used and recycled. ☉
2. 4.9 tons of small household electronic and electrical devices were recycled. ☉

46% increase in paper recycling per employee in comparison with 2011-2012 results (32.4 kgr per employee). ☉

38.1% of used toners were recycled. ☉

18,252 mobile phones and accessories were collected. ☉

7.2 tons of used household batteries were collected (around 241,000 batteries). ☉

4% reduction in the ODP indicator for refrigerant systems. ☉

41% increase in paper use per employee compared to 2012-2013 (17 kgr of paper per employee). ☉

1. 29% reduction in fuel consumption from company vehicles. ☉
2. 13.5% reduction in air miles traveled. ☉

**► 2014-2015 objective**

Recycling of 100% of waste oils collected 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 2013-2014 results (32.4 kgr per employee).

60% recycling of used toners.

Collect 20,000 mobile phones and accessories.

Collect 8 tons of used household batteries (around 266,600 batteries).

5% reduction in the ODP indicator for refrigerant systems.

Maintain paper use for printing purposes per employee in line with 2013-2014 (17 kgr of paper per employee).

1. The average CO<sub>2</sub> emission for new cars in the company's fleet, over the last 12 month period, won't exceed 130 gr CO<sub>2</sub> per km.
2. Replace 100% of petrol vehicles of company's fleet by diesel vehicles by March 2016.



Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 89-91, Assurance Report).



## Contribution to Sustainable Societies

### Exploiting our technology for equal access to communication

#### 2013-2014 objective

Retain existing products and services.

#### 2013-2014 result

Existing products and services were retained and a new application was launched. ☺

#### ► 2014-2015 objective

Retain existing products and services.

### Exploiting our technology in the areas of health and education

Extend the telemedicine program to 100 points across all of Greece (2012-2014).

Evaluate continuation of the program (Click ... ON HISTORY)

The Telemedicine Program was extended to 100 points across all of Greece. ☺

The program was completed. ☺

Maintain the Telemedicine Program at 100 points across all of Greece and evaluate the inclusion of new examinations.

■

### Supporting initiatives for the common good

Continue the program (Prospero).

Retain the existing social support lines and evaluate the possibility to provide more free calls to social support lines..

11 organisations were supported. ☺

Existing social support lines were retained and a new emergency number 1024 was added free of charge for Attiki Odos (replacing former 1866). ☺

Continue the program.

Retain the existing social support lines.

### Programs in cooperation with respectful institutions that meet direct contemporary needs of today's society

Continue the program Mobile pediatrics and dentistry unit).

Re-evaluate and change the workshops to meet children's needs and to match available resources (SOS Children's Villages).

Evaluate program continuation (Vodafone World of Difference).

25 2-day events were held in the Attica and Thessaloniki regions. ☺

The workshops were re-evaluated to meet children's needs ☺

Program was evaluated to meet society's current needs through increase of candidates (from 5 to 10) and reduction of work period (6 months instead of 12). ☺

Organise 15 2-day events in rural areas.

Maintain 8 workshops in Athens and Thessaloniki

Repeat the program (10 candidates over a 6 month-period).

### Δράσεις Εθελοντισμού Εργαζομένων

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

1. The clothes collection program was continued. ☺
2. The blood donation program was continued. ☺
3. 5 employee volunteerism programs were run. ☺

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

☺

Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 89-91, Assurance Report).

Society - Economy	2013-2014	2012-2013	2011-2012
Turnover (€ million)	708.33	912.02	1,013.03
Earnings before interest, tax, depreciation and amortization (EBITDA) (€ million)	158.130	189.80	188.15
Earnings before tax (€ million)	-25.79	-27.57	117.74
Net sales (€ million)	315.39	366.03	402.24
Cost of goods sold (€ million)	392.95	545.99	610.80
Total investments in assets (€ million) <sup>2</sup>	2,893.97	2,877.87	2,915.32
Social – Income distribution	2013-2014	2012-2013	2011-2012
Income tax (€ million)	-	-	3.21
Value added tax (€ million)	101.75	101.01	123.30
Mobile telephony duties (€ million)	74.27	89.87	98.01
Salaried staff social security contributions (€ million)	15.93	20.61	20.32
Total cost of payrolling and benefits (€ million)	79.16	103.00	100.69
Competition	2013-2014	2012-2013	2011-2012
Δικαστικές προσφυγές που εκκρεμούν ή ολοκληρώθηκαν κατά τη διάρκεια της περιόδου έκδοσης του απολογισμού για θέματα μη ανταγωνιστικής συμπεριφοράς, δημιουργίας τραστ και μονοπωλίου	⊙ 2	3	0
Responsible Behavior	2013-2014	2012-2013	2011-2012
Total Vodafone Greece customer base <sup>3</sup>	4,899,347	4,509,203	4,205,596
Complaints through EETT	⊙ 904	936	560
Complaints through Ministry of Development, etc.	⊙ 437	469	364
Total No. of employees	⊙ 1,550	1,756	2,122
No. of women in first line managerial level (Management Committee)	⊙ 3	3	2
Total No. of accidents	⊙ 5 uncontrolled & 2 controlled	2 uncontrolled & 2 controlled	1 uncontrolled & 3 controlled
New recruits	⊙ 111	83	77
Turnover	⊙ 6.7%	17.3%	7.8%
No. of leavers	⊙ 317	445	288
⊙ <b>Reported results against objectives marked with this symbol is within KPMG's limited assurance scope (see pages 89-91, Assurance Report).</b>			

Eco-efficiency	2013-2014	2012-2013	2011-2012
Network energy consumption with use of renewable energy sources (kWh)	⊙ 412	309	335
Network and offices diesel consumption (lt)	⊙ 2,796,340	4,161,479	5,525,072
Total energy consumption (network, offices, shops) (MWh)	⊙ 95,652	100,490	102,007
Total energy consumption (network, offices, shops) (Gigajoule)	⊙ 344,349	361,765	367,225
Total CO2 emissions (network, offices, shops) (tn)	⊙ 96,831	103,407	106,902
Total CO2 emissions including travelling (tn)	⊙ 98,757	105,989	109,782
Total CO2 emissions prevention due to the company's programs (tn)	⊙ 50,933	50,663	47,976
Installed quantity of R-22 refrigerant (kgr)	⊙ 6,852	7,291	8,742
Replenished quantity of R-22 refrigerant (kgr)	⊙ 203	393	580
Ozone Depletion Potential (ODP) indicator for refrigerants / kgr (x 10-5)	⊙ 2,580	2,684	3,017
No of handsets, accessories, batteries collected as part of the recycling program	⊙ 18,252	29,567	105,893
Approximately flight distance covered by employees (miles)	⊙ 1,363,259	1,575,240	2,132,191
No of special constructions	18	21	45
Environmental fines (€)	⊙ 34,500	4,500	25,100
Contribution to the Sustainable Societies	2013-2014	2012-2013	2011-2012
Program financial aid (€)	⊙ 245,550	367,690	396,8100
Value of products provided to charities (€)	⊙ 0	11,284	
<p>1. For more information on Board's approach regarding financial issues, analytical information about the company's scale and information about the share, as well as complete financial data, please visit <a href="http://vodafone.com">vodafone.com</a>.</p> <p>2. Asset investments are calculated based on the international accounting standards and the amount depicted is accumulated since the start of company operations.</p> <p>3. Due to the 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 mean that he/she will use those services in the Attica area or that he/she lives in that specific area..</p>			
<p>⊙ Data marked with this symbol is within KPMG's limited assurance scope (see pages 89-91, Assurance Report).</p>			

**A**

**AccountAbility Standards**  
[www.accountability.org.uk](http://www.accountability.org.uk)  
**Alpha Bank** [www.alpha.gr](http://www.alpha.gr)  
**American-Hellenic Chamber of Commerce**  
[www.amcham.gr](http://www.amcham.gr)  
**Anthropinoi-anthropoi**  
[www.anthropinoi-anthropoi.gr](http://www.anthropinoi-anthropoi.gr)  
**Aristotle University of Thessaloniki**  
[www.auth.gr](http://www.auth.gr)  
**Arsis Kozanis** <http://arsiskozanis.blogspot.gr>  
**Association for the Psychosocial Health of Children and Adolescents** [www.epsype.gr](http://www.epsype.gr)  
**Association of Chief Executive Officers**  
[www.ease.gr](http://www.ease.gr)  
**Athens Alzheimer's Association**  
[www.alzeimerathens.gr](http://www.alzeimerathens.gr)  
**Athens Medical Center** [www.iatriko.gr](http://www.iatriko.gr)  
**Attica Natural Gas** [www.aerioattikis.gr](http://www.aerioattikis.gr)  
**Attiki Odos** [www.aodos.gr](http://www.aodos.gr)

**B**

**Biopolitics International Organisation**  
<http://biopolitics.gr>  
**Blind.gr** [www.blind.gr](http://www.blind.gr)  
**Body for the collection of home batteries (AFIS)** [www.afis.gr](http://www.afis.gr)  
**Bread & Action** <http://artosdrasi.rei.gr>  
**Business Council for the Sustainable Development** [www.sevbcsd.org.gr](http://www.sevbcsd.org.gr)

**C**

**Capital Link** <http://greece.capitallink.gr/>  
**Civil Protection Authority**  
[www.civilprotection.gr](http://www.civilprotection.gr)  
**Consumers Institute** [www.newinka.gr](http://www.newinka.gr)  
**Corporate Social Responsibility Europe**  
[www.csreurope.org](http://www.csreurope.org)  
**CR Index** [www.cri.org.gr](http://www.cri.org.gr)

**D**

**Desmos** <http://desmos.org>  
**Diogenis NGO** [www.shedia.gr/about-us/](http://www.shedia.gr/about-us/)  
**Down Syndrome Association of Greece**  
<http://down.gr/site>

**E**

**Effie Hellas** [www.effiehellas.gr](http://www.effiehellas.gr)  
**'ENIGMA' Information Program for EMF**  
[www.enigma-program.gr](http://www.enigma-program.gr)  
**ERMIS Awards**  
[www.ermisawards.gr](http://www.ermisawards.gr)  
**European Commission**  
<http://ec.europa.eu>

**F**

**Fire Brigade** [www.fireservice.gr](http://www.fireservice.gr)  
**FirstData** [www.firstdata.com/en\\_gr/](http://www.firstdata.com/en_gr/)  
**FLOCAFE** [www.flocafe.gr](http://www.flocafe.gr)  
**Foundation of the Hellenic World**  
[www.ime.gr](http://www.ime.gr)  
**FTSE4GOOD** [www.ftse.com](http://www.ftse.com)

**G**

**Global e-Sustainability Initiative**  
[www.gesi.org](http://www.gesi.org)  
**Global Reporting Initiative (GRI)**  
[www.globalreporting.org](http://www.globalreporting.org)  
**GOODY'S** [www.goodysnet.com](http://www.goodysnet.com)  
**Greek Atomic Energy Commission**  
[www.eeae.gr](http://www.eeae.gr)  
**Greek Research and Technology Network** [www.gnet.gr](http://www.gnet.gr)  
**GreenLight** [www.eu-greenlight.org](http://www.eu-greenlight.org)  
**GSM Association** [www.gsma.com](http://www.gsma.com)  
**GSM Europe** [www.gsm-eur.com](http://www.gsm-eur.com)

**H**

**Hadzipaterion Rehabilitation Center for Children with Cerebral Palsy**  
[www.ike.org.gr](http://www.ike.org.gr)  
**Hellas online** [www.hol.gr](http://www.hol.gr)  
**Hellenic Accreditation System S.A. (E.SY.D.)**  
[www.esyd.gr](http://www.esyd.gr)  
**Hellenic Advertisers Association**  
[www.sde.gr](http://www.sde.gr)  
**Hellenic Authority for the Information and Communication Security and Privacy (ADAE)** [www.adae.gr](http://www.adae.gr)  
**Hellenic Business Ethics Institute (European Business Ethics Network - EBEN GR)**  
[www.eben.gr](http://www.eben.gr)  
**Hellenic Data Protection Authority**  
[www.dpa.gr](http://www.dpa.gr)  
**Hellenic Healthy Cities Network** [www.ddy.gr](http://www.ddy.gr)  
**Hellenic National Transplant Organisation**  
[www.eom.gr](http://www.eom.gr)  
**Hellenic Network for Corporate Social Responsibility** [www.csrhellas.gr](http://www.csrhellas.gr)  
**Hellenic Organisation for Standardisation (ELOT)** [www.elot.gr](http://www.elot.gr)  
**Hellenic Police** [www.astynomia.gr](http://www.astynomia.gr)  
**Hellenic Red Cross** [www.redcross.gr](http://www.redcross.gr)  
**Hellenic Society for Social Paediatrics and Health Promotion** [www.socped.gr](http://www.socped.gr)  
**Hellenic Society for the Study of Internet Addiction Disorder** [www.hasiad.gr](http://www.hasiad.gr)  
**'HERMES' Program for the systematic measurement of EMF**  
[www.hermes-program.gr](http://www.hermes-program.gr)

**I**

**International Commission on Non-Ionising Radiation Protection (ICNIRP)**  
[www.icnirp.de](http://www.icnirp.de)  
**International Organisation for Standardisation**  
[www.iso.org](http://www.iso.org)  
**International Telecommunications Union**  
[www.itu.int](http://www.itu.int)

**K**

**Katafygio gynaiakas**  
[www.katafygiogynaiakas.org/prostasia](http://www.katafygiogynaiakas.org/prostasia)  
**KPMG Advisors A.E.** [www.kpmg.gr](http://www.kpmg.gr)

**L**

**Lloyd's Register Quality Assurance (LRQA)**  
[www.greece.lrqa.com](http://www.greece.lrqa.com)

**M**

**Meda Communication** [www.meda.gr](http://www.meda.gr)  
**Medecins du Monde** [www.mdmgreece.gr](http://www.mdmgreece.gr)  
**Microsoft** [www.microsoft.com](http://www.microsoft.com)  
**Ministry of Development and Competitiveness** [www.ypoi.gr](http://www.ypoi.gr)  
**Ministry of Health** [www.moh.gov.gr](http://www.moh.gov.gr)  
**Ministry of Mercantile Marine** [www.yen.gr](http://www.yen.gr)  
**Ministry of Public Order and Citizen Protection** [www.minocp.gov.gr](http://www.minocp.gov.gr)  
**Municipality of Agia Varvara**  
[www.agiavarvara.gr](http://www.agiavarvara.gr)  
**Municipality of Aigaleo** [www.aigaleo.gr](http://www.aigaleo.gr)  
**Municipality of Heraklion Crete**  
[www.heraklion.gr](http://www.heraklion.gr)  
**Municipality of Ithaki** [www.ithaki.gr](http://www.ithaki.gr)  
**Municipality of Kefallonia**  
[www.kefallonia.gov.gr](http://www.kefallonia.gov.gr)  
**Municipality of Perama** [www.dperama.gr](http://www.dperama.gr)  
**Museum of the City of Athens - Vouros - Eutaxias foundation**  
<http://athenscitymuseum.gr>

**N**

**Napster** [www.vodafone.gr/napster](http://www.vodafone.gr/napster)  
**National Center for Urgent Social Aid**  
[www.ekav.gr](http://www.ekav.gr)  
**National Center of Instant Help**  
[www.ekab.gr](http://www.ekab.gr)  
**National Technical University of Athens**  
[www.ntua.gr](http://www.ntua.gr)  
**National Telecommunications and Post Commission**  
[www.eett.gr](http://www.eett.gr)  
**Netpolis** [www.netpolisgame.gr](http://www.netpolisgame.gr)  
**Network for children's rights** [www.ddp.org.gr](http://www.ddp.org.gr)

## Abbreviations

### O

**Organisation Against Drugs (OKANA)**  
www.okana.gr

### P

**PRAKSIS** www.praksis.gr/el  
**Public Power Corporation** www.dei.gr  
**Procter and Gamble** www.epithimies.gr

### Q

**Quality Net Foundation**  
www.qualitynetfoundation.gr

### 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  
**SKAI** www.skai.gr  
**SOS Children's Villages**  
www.sos-villages.gr  
**Social Media Awards**  
www.socialmediaawards.gr

### T

**Telecommunications Industry Dialogue on Freedom of Expression and Privacy**  
www.telecomindustrydialogue.org  
**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 Piraeus**  
www.unipi.gr/eng\_site

### V

**Vidavo** www.vidavo.gr  
**Vodafone CU** www.vodafonecu.gr  
**VPRC** www.vprc.gr

### W

**Welfare Association "Agioli Theodoroi"**  
www.facebook.com/ag.theodoroi  
**World Business Council for Sustainable Development**  
www.wbcsd.ch  
**World Health Organisation**  
www.who.int/en/

### Y

**YMCA Thessaloniki** www.ymca.gr

### A

**ADAE** Hellenic Authority for the Information and Communication Security and Privacy  
**AFIS** Portable Battery Recycling Scheme  
**APHCA** Association for the Psychosocial Health of Children and Adolescents

### B

**BS** Base Station  
**BS** British Standard

### C

**CEO** Chief Executive Officer  
**CO<sub>2</sub>** Carbon Dioxide  
**CR** Corporate Responsibility  
**CSR** Corporate Social Responsibility

### E

**EBEN GR** Hellenic Business Ethics Institute  
**EETT** National Telecommunications and Post Commission  
**EIA** Environmental impact assessment  
**EKAB** National Center of Instant Help  
**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  
**ICT** Information Communication Technology

### K

**KCQ** Key Control Questionnaire  
**KETHEA** Therapy Center for Dependent Individuals  
**kg** Kilogram  
**Kw** Kilowatt  
**Kwh** Kilowatthour

### L

**LRQA** Lloyd's Register Quality Assurance  
**lt** Litre

### M

**m<sup>3</sup>** Cubic Metre  
**m<sup>2</sup>** Square Metre  
**Mb** Megabyte  
**MMS** Multimedia Messaging Service  
**MTX** Switching Center  
**MWR** Megawatt hours

### N

**NGO** Non-Governmental Organisation

### O

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

### P

**Pb** Lead  
**PV** Photovoltaic

### R

**RF** Radio Frequency

### S

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

### T

**Tn** Ton  
**TRX** Transceiver

### V

**VAT** Value Added Service

### W

**WCSDD** World Business Council for Sustainable Development

### -

**€** Euro  
**3G** 3rd Generation Telecommunications Network  
**4G** 4th Generation Telecommunications Network

GRI Indicators	Section / Note	Section / Note	Section / Note
<b>Strategy and analysis</b>			
1.1 CEO Statement	1	4.7 Board expertise on sustainability	1, 7-11
1.2 Key impacts, risks and opportunities	1, 2-3, 4, 6-19	4.8 Mission and value statements	2-3, 7-11, 36-38
		4.9 Board governance	7-11, 15-18, 43-45
		4.10 Evaluation of the Board's performance	7-11, 16-17, 42-45
		4.11 Precautionary approach / principle	2-3, 11-12, 21-22, 58-59
		4.12 External charters / principles	2-3, 12-13, 18-19, 33-36
		4.13 Association memberships	12-13, 45
		4.14 List of stakeholders	12-13
		4.15 Stakeholder identification	12-13
		4.16 Approaches to stakeholder engagement	2-3, 11, 12-13, 16, 19, 23-24, 38, 40-45
		4.17 Topics raised by stakeholders	3, 12-13, 19, 21-26, 34-36
<b>Organisational profile</b>		<b>Economic performance indicators</b>	
2.1 Name of the reporting organisation	4	Disclosure on Management approach	1, 80-81
2.2 Brands, products and/or services	5	EC1 Direct economic value	1, 5, 80-81
2.3 Operational structure	6-19	EC2 Implications from climate change	1, 2-3, 49, 51-55, 63-64
2.4 Headquarter location	4	EC3 Defined benefit plan	47
2.5 Countries in operation	4	EC4 Financial government assistance	Vodafone Greece has not received any significant financial assistance from the government and government is not present in Vodafone Greece shareholding structure.
2.6 Nature of ownership	4		
2.7 Markets served	5, 80-81		
2.8 Scale of the organisation	5, 53, 80-81		
2.9 Significant organisational changes	1, 5		
2.10 Awards received	5		
<b>Report parameters</b>			
3.1 Reporting period	4		
3.2 Previous report	4		
3.3 Reporting cycle	4		
3.4 Contact point for questions	4		
3.5 Content definition	2-3, 4, 11-13		
3.6 Boundary of the report	4		
3.7 Limitations on the report's scope	2-4		
3.8 Joint ventures, subsidiaries and outsourcing	4		
3.9 Data measurement techniques	4, 47, 50, 57-59, 60-61, 80-81		
3.10 Effects of information re-statement	5, 50-55		
3.11 Changes from previous reports	4-5, 50-55		
3.12 Location of Standard Disclosures	84-87		
3.13 External assurance	4, 89-91		
<b>Government, commitments and engagement</b>			
4.1 Governance structure	7-11, 15-16		
4.2 Chair's role and function	7-11		
4.3 Independent / non-executive members at the board	7-11		
4.4 Shareholder / employee participation	11, 19, 40, 42-43		
4.5 Executive remuneration and performance	43-45, 80-81		
4.6 Conflicts of interest at the board	7-11, 15-16		
		<b>Environmental performance indicators</b>	
		Disclosure on Management approach	1, 7-11, 48-61
		EN1 Volume of materials used	Not material-Vodafone Greece does not manufacture.
		EN2 Recycled materials	
		EN3 Direct energy consumption by primary energy source	50-55, 80-81
		EN4 Indirect energy consumption by primary source	50-55, 80-81
		EN5 Energy saved	50-55
		EN6 Initiatives for renewable energy	50-54, 64
		EN7 Initiatives for reducing indirect energy	60-61, 63-64

GRI Indicators	Section / Note		Section / Note
EN8 Water withdrawal	Not material based on company's Impact 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.	LA5 Minimum notice periods	At Vodafone Greece there is a minimum notice period of approximately three weeks for substantial operational changes affecting the long-term relationship of employees.
EN11 Land assets in sensitive areas	Not material-However, Vodafone Greece does assess potential impacts on biodiversity in its network deployment.	LA6 Workforce in joint health and safety committees	45-47
EN12 Biodiversity within lands owned		LA7 Occupational injuries and absenteeism	45-47, 80-81
		LA8 Education on serious diseases	45-47
EN16 Greenhouse gas emissions	50, 80-81	LA10 Training per employee	43-45
EN17 Other indirect greenhouse gas emissions	80-81, 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.	LA11 Lifelong learning	43-45
		LA12 Career development	40, 43-45, 80-81
EN18 Initiatives to reduce greenhouse gases	50	LA13 Employee diversity and governance	40-41
EN19 Ozone-depleting substance emissions	59	LA14 Basic salary ratio of men to women	41, Vodafone Greece offers the same pay for the same job irrespective of gender.
EN20 NOx and SOx emissions	51	LA15 Return to work and retention rates after parental leave, by gender	41
EN21 Water discharge	Not material based on company's Impact Assessment results.		
EN22 Waste by disposal method	48-61	<b>Social performance indicators:</b>	
EN23 Significant spills	No relevant incident occurred.	<b>Human rights</b>	
EN26 Environmental impact mitigation	48-61	Disclosure on Management approach	2-3, 7-12, 36-38
EN27 Packaging materials	58-59, 80-81	HR1 Human rights clauses in investment	7, 36-38, The company takes into consideration the P.D. 178/2002 (employees rights protection) in cases of important investment agreements.
EN28 Non-compliance sanctions	23, 80-81		
EN29 Environmental impact of transport	60-61, 80-81	HR2 Supplier screening on human rights	7, 11, 36-38
		HR3 Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	7, 18, 43-45
<b>Social performance indicators:</b>			
<b>Labour practices and decent work</b>			
Disclosure on Management approach	7-11, 39-47	HR4 Discrimination	7-11, 40
LA1 Workforce breakdown	41, 80-81	HR5 Association and collective bargaining	11, 36-38, 40-41
LA2 Employee turnover	41	HR6 Child labour	36-38, 40
LA3 Benefits provided to full-time employees	47	HR7 Forced labour	11, 36-39, 40
LA4 Collective bargaining agreements	40-41	HR10 Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments	2-3, 7-12, 36-38, 40-41
		HR11 Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms	7-11, 36-38, 40-41



GRI Indicators		Section / Note	Section / Note
<b>Social performance indicators: Society</b>		SO10 Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities	2-3, 12-14, 21-22, 36-38, 48-61
	Disclosure on Management approach		
SO1	Impacts on communities		
SO2	Corruption risks		
SO3	Anti-corruption training		
SO4	Actions against corruption		
SO5	Public policy and lobbying		
		<b>Social performance indicators: Product responsibility</b>	
		Disclosure on Management approach	7-11, 21-33
SO6	Political contributions/donations	PR1 Product life cycle	19, 21-26, 33, 38, 58-59, 61
		PR3 Product information	33, 34-36, 38, 61
		PR6 Marketing communications programs	
SO7	Anti-competitive behavior	PR7 Non-compliance in marketing practices	26-27
SO8	Regulatory non-compliance sanctions	PR8 Client privacy	13-15
SO9	Operations with significant potential or actual negative impacts on local communities	PR9 Product non-compliance	13-15
<b>Telecommunications Sector Specific GRI Indicators</b>			
		<b>Section / Note</b>	<b>Section / Note</b>
<b>Internal operations</b>		<b>Providing access</b>	
IO1	Investment in telecom network infrastructure	PA1 Remote and low population density areas	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.
IO2	Extended service to not profitable locations		65-66
IO3	Health and safety of field personnel		
IO4	Radiofrequency emissions from handsets		
IO5	Radiofrequency emissions from base stations	PA2 Overcoming barriers for access and usage	
IO6	Specific Absorption Rate of handsets	PA3 Availability and reliability ensurance	17, www.vodafone.gr
IO7	Sitting of masts and transmission sites		
IO8	Data for sites	PA4 Level of availability	www.vodafone.gr Due to Vodafone Greece operating segment, it is not possible to include customer type and geographical distribution. For example, a postpay customer that has requested Vodafone Greece services in the Attica area, does not necessarily means that he/she uses these services in the Attica area and/or that he/she stays in this specific area.

Telecommunications Sector Specific GRI Indicators		Section / Note		Section / Note		
PA5	Usage by low and no income people	26-33	<b>Technology applications</b>			
PA6	Emergency situations and disaster relief	17, 68-69		TA1	Resource efficiency of products and services	51-55, 60, 63-64
PA7	Human rights issues for access and usage θέματα πρόσβασης και χρήσης	34-36		TA2	Potential replacement of physical objects	60-61, 63-64
PA8	EMF issues communication	21-26, 33		TA3	Measures of transport and/or resource changes of customer use	63-64 <a href="http://www.sepe.gr/files/pdf/Executive%20Summary.pdf">http://www.sepe.gr/files/pdf/Executive%20Summary.pdf</a>
PA9	Investement in electromagnetic field research	22, 25-26, <a href="http://www.vodafone.com/content/index/about/sustainability/mpmh/scientific_research/research_programmes.html">http://www.vodafone.com/content/index/about/sustainability/mpmh/scientific_research/research_programmes.html</a>		TA4	Estimates of the rebound effect	63-64 <a href="http://www.sepe.gr/files/pdf/Executive%20Summary.pdf">http://www.sepe.gr/files/pdf/Executive%20Summary.pdf</a>
PA10	Charges and tariffs clarification	26-27	TA5	Intellectual property rights and open source technologies	www.vodafone.gr	
PA11	Information on responsible, efficient and environmentally preferable use	2-3, 12-13, 19, 33, 34-36, 54-55, 58-59, 63-64				

Notes:

The afore-mentioned requirements-indicators refer to Sustainability Reporting Guidelines of GRI (2011) and to GRI Telecommunications Sector Supplement (2003).

The additional GRI Indicators are presented in grey color.

### GRI (3.1) Report Application Level

REPORT APPLICATION LEVEL		C	C+	B	B+	A	A+
STANDARD DISCLOSURES	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.	✓
	MANAGEMENT APPROACH DISCLOSURES OUTPUT	Not Required.		Management Approach Disclosures for each Indicator Category.		Management Approach Disclosures for each Indicator Category.	
	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 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

**The aim of our company's Sustainability Program is to continue to operate responsibly, to efficiently use natural resources, energy and materials and to utilise our technology to offer innovative products and services, in order to support the Greek economy, while generating benefits for the environment, as well as the Greek society. Moreover, we are partnering up with solid bodies and institutions to implement long lasting programs that cover society's current needs.**

Vodafone Greece Sustainability program is determined through the annual assessment of our operations impact in conjunction with regular consultation with Stakeholders. Via this process the "Material Issues" for the company derive, and based on those we set the areas that we focus our actions, in accordance with the principles of the AA1000 APS. Our aim is to manage our Sustainability program and the content of the company's Sustainability Report, so that it follows the principles of the AA1000APS standard.

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

## Inclusivity

To identify Stakeholders, we evaluate those groups in society that are affected by or affect company operations. We then recognise and record their needs and expectations, through face-to-face meetings, qualitative (in-depth) and quantitative surveys, as well as focus groups. This fosters dialogue, creating a suitable field within which opinions can be voiced and exchanged. Through the specific dialogue, our belief that we understand the needs and expectations of Stakeholders is reinforced, as well as the certainty that we are managing issues of concern to them. We remain committed to constantly endeavoring to meet our Stakeholders's needs and expectations.

More specifically, in relation to the Stakeholder Engagement Survey carried out approximately every two years, we reexamined its frequency and we are exploring the possibility of conducting a short survey on an annual basis and a more extended every two years. This change we believe will help us to better manage the issues that our Stakeholders are concerned about, in a constantly changing environment.

## Materiality

From the company's outset, we have been focusing on sectors, which are deemed material for company operations and on sectors which have been highlighted as important by our Stakeholders. Moreover, current social and financial circumstances have brought to light new sectors to which the company can contribute through its technology. Conclusively, the most important material areas for Vodafone Greece are the following:

### Responsible Behavior

1. Mobile Phones - Base stations - Health - Network Deployment
2. Customers
3. Safe Internet use by Children and Adolescents
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. Utilising mobile communications technology, products and services in order to:
  - ▮ support the Greek economy
  - ▮ support the Greek society
10. Programs in cooperation with solid bodies aiming to cover society's current needs
11. Employees' volunteerism

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

## Responsiveness

We strive to meet our Stakeholders' needs and expectations, using the feedback obtained from consultation with them. Their expressed needs and expectations are taken into account in relation to the 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 regardless of whether the specific objectives have been achieved or not, in our effort to reinforce transparency.

It remains at the centre of our vision, the exploration and development of opportunities that can -via our technology- contribute to the sustainability of the Greek economy, business, and society in general.

That is why, we strategically invest in utilising our technology to promote society's sustainability, in financial, social and environmental terms; our performance in that sector is described in the Sustainability Report. This utilisation of technology focuses on areas pertaining to supporting the Greek economy, stimulation of Greek businesses' competitiveness, while generating benefits for the environment, equal access to specialised health care services for residents of remote areas, as well as equal access to communication for disabled people. Furthermore, the company invests in programs implemented by solid bodies that provide solutions to society's current needs.

## 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 Sustainability Report 2013-2014 (further referred to as the "Report") for the reporting period ended 31 March 2014.

### What was included in the scope of our assurance engagement?

Our engagement was designed to provide limited assurance in accordance with ISAE 3000<sup>1</sup> and the requirements for a Type 2 assurance engagement under AA1000AS (2008)<sup>2</sup> on the following aspects of the Report (assurance scopes):

1. the application of AA1000APS (2008)<sup>3</sup> principles, as described on page 88 of the Report,
2. the reliability of the "Managing Sustainability" section marked with the symbol © on pages 6-19 of the Report,
3. the stated results against objectives marked with the symbol © and reported in the "Objectives – Results – New Commitments Table" on pages 74-79 of the Report,
4. the reliability of performance data for 2013-2014 marked with the symbol © and reported in the "Main Figures in Table Form" section on pages 80-81 of the Report,
5. Vodafone's self-declared Global Reporting Initiative (GRI) application level of the Report, including the telecommunications sector specific GRI indicators.

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

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

### Which reporting criteria did Vodafone use?

Vodafone applies the AA1000APS (2008) criteria for the three principles of inclusivity, materiality and responsiveness as described on page 88 of the Report.

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

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

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.

### What was excluded from the scope of our assurance engagement?

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

To obtain a thorough understanding of Vodafone's financial results and financial position, the 2013-2014 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 88 of the Report, is not fairly stated in all material respects. Without affecting our conclusion, the following are recommended:

- ▮ In relation to the principle of inclusivity, Vodafone should maintain and build on the already established model for stakeholder engagement with its latest adjustments, which allow for a more frequent contact with its stakeholders.
- ▮ In relation to the principle of materiality, Vodafone should maintain the current procedures for identifying material issues and aim at further expanding them by i.e. disclosing the way of addressing conflicts or dilemmas between different expectations regarding materiality.
- ▮ In relation to the principle of responsiveness, Vodafone could further enhance the existing collaborative approach of integrating stakeholders needs and expectations in the products, services and programs the company develops to meet its Sustainability objectives, as well as in the way the company communicates its sustainability performance.

**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 Sustainability" section marked with the symbol © on pages 6-19 of the Report, the stated results against objectives marked with the symbol © reported in the "Objectives – Results – New Commitments Table" on pages 74-79 of the Report, and the reliability of performance data marked with the symbol © for 2013-2014 reported in the "Main Figures in Table Form" section on pages 80-81 of the Report, are not fairly stated in all material respects.

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

Nothing has come to our attention to suggest that Vodafone's self-declaration of GRI application level A+ on pages 1 and 87 is not fairly stated in all material respects.

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

**Responsibilities**

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

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

KPMG Advisors A.E



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

George Raounas  
Partner

Athens, December 2nd 2014









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