

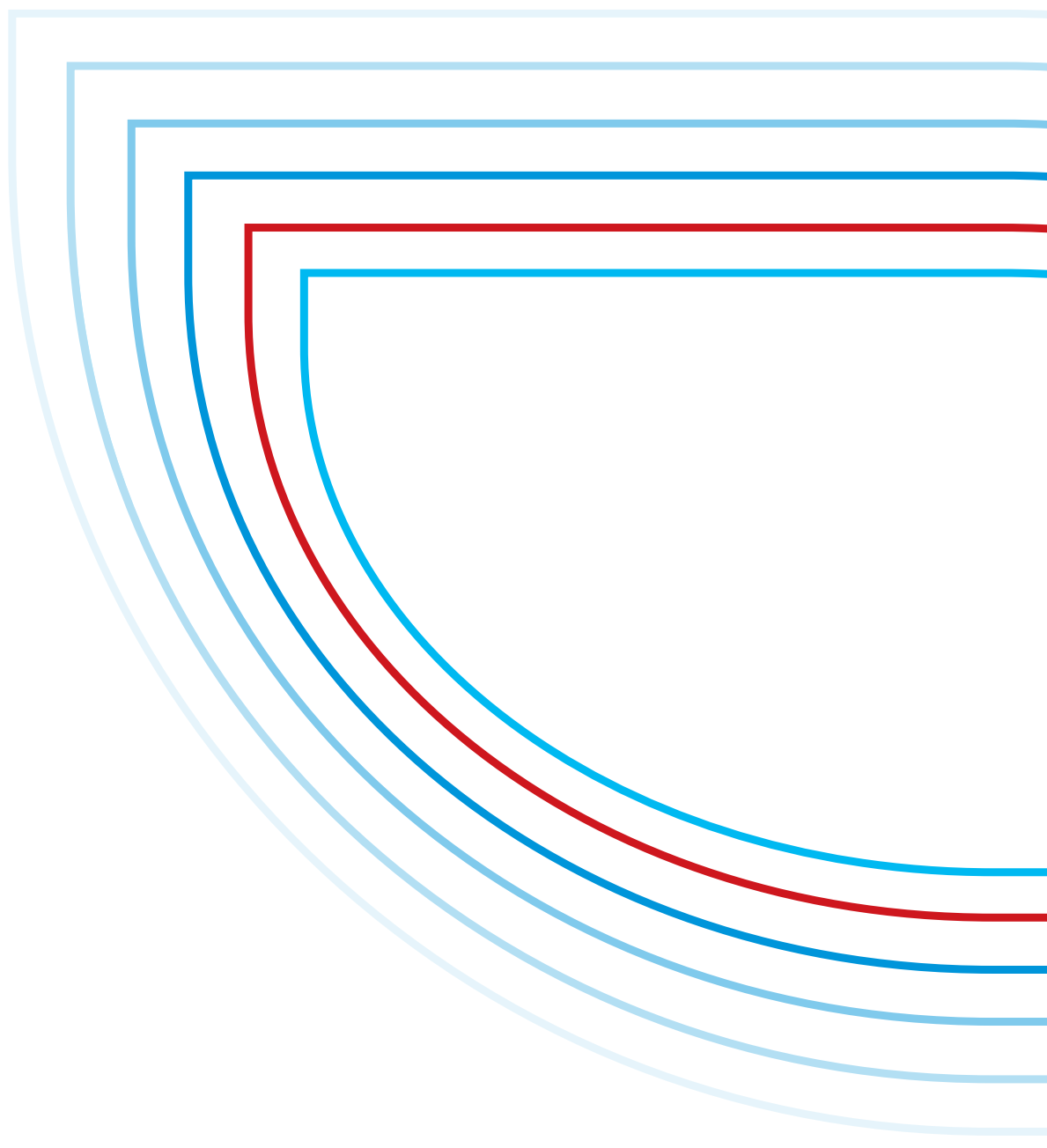
**A YEAR
WITH FRESH WIND**

**SUSTAINABILITY
REPORT**

2014

inaction*
CORPORATE RESPONSIBILITY WIND



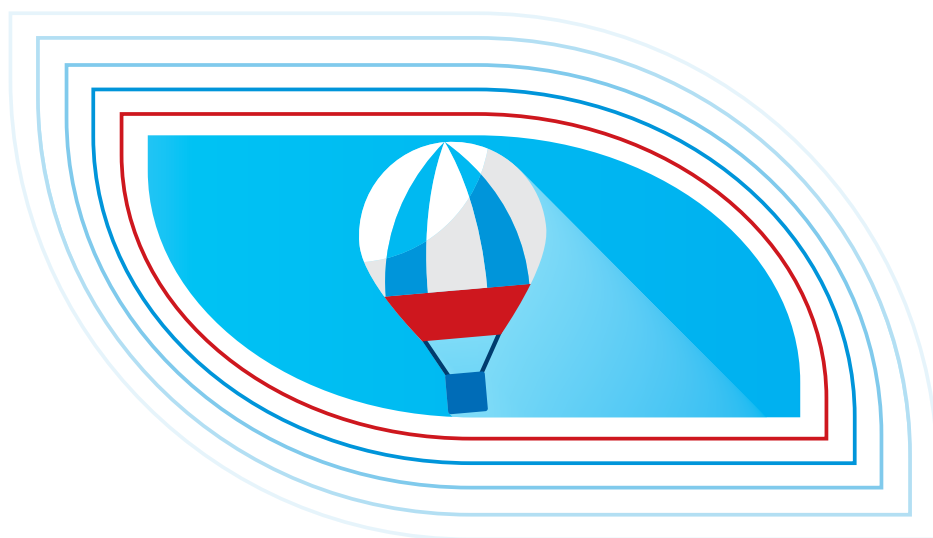




CONTENTS

1 About the Report	3
2 Message from the Chairman of the Board & CEO	4
3 WIND Hellas Communication with a fresh air	5
Financial Growth & Feature Figures	6
Distinctions	6
Participation	7
4 Corporate Responsibility	8
Our Stakeholders	9
Dialogue with our Stakeholders	9
Substantive Issues Recognition Procedure	10
We promote Responsible Entrepreneurship & Technological Innovation	11
5 Corporate Governance	12
Responsible Management	12
Management Practice	13
Internal Audit	15
Compliance System	15
Procedures, Management Systems and Certifications	16
6 Society	17
We contribute to Society	17
Participation	18
Contribution	19
Awareness	21
7 Employees	25
Human Resource Data	25
Human Rights & Equal Opportunities	26
Employments Conditions & Additional Benefits	27
Health & Safety	28
Employee Growth & Development	28
Corporate Integration Programs	29
Internal Communication	29
Employee Events	30
Volunteerism and Social Contribution	31
Focus to Customer	31
8 Market	32
Focus to Customer	32
Our Telecommunication Network	32
Electromagnetic Radiation	33
Economy for All	33
Responsible Service	34
Responsible Products	36
Responsible Marketing	36
Intellectual Property & Communication Privacy	37
Customer Satisfaction	38
Responsible Suppliers	40
9 Environment	42
Our policy for a clean environment	42
Climate, Energy and Energy Management	43
Total Energy Consumption	44
Pollutants	45
Waste Production and Management	47
10 Objectives 2015 & Results 2014	50
11 UN Global Pact: Progress Report	52
12 GRI Indexes & Certifications	53
13 Glossary /Appendix A	56

1 ABOUT the Report



THE PRESENT
CORPORATE
RESPONSIBILITY
REPORT OF WIND
HELLAS INCLUDES
INFORMATION
ABOUT
THE POLICIES
AND CORPORATE
RESPONSIBILITY
PROGRAMS
OF THE COMPANY
AND COVERS
THE PERIOD FROM
1ST JANUARY TO 31ST
DECEMBER 2014.



2014

IT IS THE EIGHTH IN ORDER ANNUAL CORPORATE RESPONSIBILITY REPORT THAT HAS BEEN ISSUED. GIVING PRIORITY TO THE FOUR PILLARS OF CORPORATE RESPONSIBILITY:

Market, Environment, Employees and Society, WIND implements strategies and actions aimed at sustainable development and entrepreneurship. Our previous report was issued in September 2014 and concerned the year 2013.

The **Corporate Responsibility Report 2014** was prepared in accordance with the guiding base level guidelines («core») of the latest version of international **G4 version of the GRI International Reporting Guidelines (Global Reporting Initiative).**

2 MESSAGE FROM THE CHAIRMAN of the Board & CEO



NASSOS ZARKALIS CHAIRMAN AND CEO OF WIND HELLAS

DEAR FRIENDS,
THIS IS THE SEVENTH YEAR THAT I
HAVE THE HONOR TO INTRODUCE TO
YOU OUR COMPANY'S REPORT ON
CORPORATE SOCIAL RESPONSIBILITY.
I WOULD LIKE TO MARK THIS
OCCASION BY A FEW OBSERVATIONS:

First of all, in regards to WIND Hellas. Despite the enormous difficulties that the telecommunications market has been facing from 2008 to date, our company has managed to achieve many and important things:

We successfully adapted to the new environment by implementing a fresh, flexible and efficient business model which places value for our customers at its core.

Taking our commitment to offer our customers the maximum possible value as our guide, we embraced a renewed culture. We empowered our people; we created a simple structure that fosters cooperation and creativity. We effected a positive change on our internal environment and having done so, we took a step further to positively influence our whole market: we established strategic partnerships and agreements that greatly changed the telecommunications industry of our country.

Partnerships of commercial, technological and investing nature. 2014 was the year we began to taste the fruit of our efforts and as we do every year, we had the possibility to remain an Active Corporate Citizen through a plethora of social solidarity activities, support to children, protection of the environment and promotion of volunteering. You will have the chance to read about these actions in the present report.

Indeed, the path that WIND has travelled through these years, gives us many reasons to be proud and I want to thank all of our people that did their best in order to march forward, free from past burdens.

MESSAGE FROM THE CHAIRMAN of the Board & CEO



2014

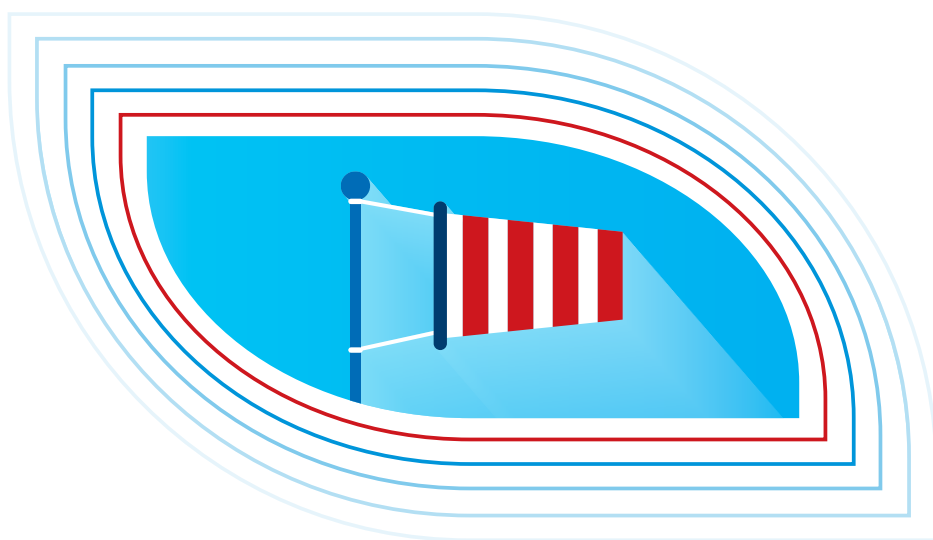
Our country on the other hand, continues to struggle. Regretfully, these past years we experienced a very difficult situation for Greece and the Greeks. This crisis has scarred not just our economy but mostly our society, our friends, our relatives, our own people. Since this happened, our thoughts tend to be negative and pessimistic. It is difficult, perhaps even impossible at times, to remain calm and optimistic.

We have anger, anxiety and questions about what is actually happening. Although this is normal, it has nothing to offer us. The past must not undermine our future.

So let us try and think differently. Now more than ever, is the time to become wiser from the lessons we got, to roll up our sleeves and claim our future calmly, with a smile, with love and mutual support.

Having said that, it is clear that Wind Hellas must assume even more responsibility towards its stakeholders and Greek society. We will do so, being fully aware of the critical times we live in but without compromising the prospects we want to pursue.

3 WIND HELLAS



WIND HELLAS IS ONE OF THE LARGEST TELECOMMUNICATIONS COMPANIES IN GREECE. WITHIN THE 23 YEARS OF OPERATION, WIND WAS ESTABLISHED AS A PIONEER IN MOBILE PHONE TECHNOLOGY AND PRODUCT INNOVATIONS THAT HAVE CHANGED THE DATA IN COMMUNICATION.

WIND HELLAS COMMUNICATION WITH A FRESH AIR

TODAY, WITH MORE THAN 4.7 MILLION SUBSCRIBERS IN MOBILE AND FIXED TELEPHONY, WIND HELLAS WAS THE FIRST TELECOMMUNICATION COMPANY IN GREECE THAT OFFERED COMPREHENSIVE SERVICES FOR MOBILE, FIXED TELEPHONY & INTERNET CUSTOMERS.

Flexibility, reliability and simplicity characterize the architecture of the single WIND network offering coverage of almost 100% in mobile and 70% of installed telephone lines across the country, in fixed telephony and broadband Internet. The Company was founded in 1992 and began its activity in the Greek market in June 1993, when the first call from a mobile in our country took place through its network.

2007 marked a new chapter in the history of WIND as it acquired the fixed telephony & Internet company, Tellas and then consolidated the mobile and fixed telephony networks, creating the only unified telecommunications network in Greece.

In 2013, WIND entered a strategic agreement with Vodafone Greece, in order for the two companies to develop a partially common network of mobile telephony base stations across Greece, with particular emphasis on the regions and densely populated urban areas.

WIND
HELLAS



THE AIM OF THIS COOPERATION IS FOR ALL GREEKS TO ENJOY MOBILE BROADBAND SERVICES THROUGH THE SHARED INFRASTRUCTURE.

This extensive project has been undertaken by the new company Victus Networks, in which the companies WIND Hellas and Vodafone Greece participate, with 50% each. Victus Networks started its operations in 2014.

Finally, in October 2014, WIND has made another major investment of 121.8 mil. in order to acquire new spectrum usage rights.

This new spectrum will be used to develop the new generation mobile network and will support the offer of mobile broadband services, offering to WIND Hellas subscribers increased capacity and high speeds for data usage from their mobile phone.

2014



**WE INVESTED
121,8 mil. euros**

for obtaining
rights to use
the spectrum.

FINANCIAL GROWTH & FEATURE FIGURES







During its course, WIND was one of the largest private investors in Greece, as it realized investments amounting **2,78€ billion** in technological infrastructure, thereby creating tangible and intangible value for the economy and the country.

The wider economic footprint of WIND in the greek economy is also important, since it is estimated that only during the last four years the Company together with its ecosystem has contributed more than **3,7€ billion** government revenues. Respectively, for the same period, the direct and indirect contribution of WIND in employment income exceeded **670€ million**.

WIND is totally owned by Largo Limited holding company, which determines the strategy and development plan of the Company. WIND Hellas' shareholders are six of the largest investment funds worldwide.

By investing in WIND Hellas they practically showed their faith in the growth prospects of the Company, as well as the ability of the Greek economy to recover.

FEATURE FIGURES

		2013 (in million €)	2014 (in million €)
	Turnover	525,3	492,2
	Investments	54,3	186,5*
	Social insurance cost	9,0	7,6
	Total financial liabilities	483,4	299,4
	Total equity	65,3	350,9
	Total assets	892,4	1.072,7

* (the 121,8 million euro concern 4th generation rights)

2013

Mobile and fixed telephony customers	4,9mil.
Number of stores at the end of the period	246
Employees	1.138

2014

Mobile and fixed telephony customers	4,7mil.
Number of stores at the end of the period	221
Employees	975



DISTINCTIONS

2014: A YEAR OF DISTINCTIONS IN GREECE AND ABROAD

In 2014, we stood out in many areas such as innovation, customer support, human resource management as well as our sensibility to important issues of the society.

CR National Corporate Responsibility Index

Our company won the Gold award for its performance in CSR and the special distinction Best Award.

17th Human Resources Symposium and Human Resources awards of KPMG

The "Management of Change" award was attributed to WIND recognising the transformation of the organisation and the establishment of a new business culture that makes it more competitive in the market and creates more value for all its stakeholders.



Ethos Sustainability Awards 2014:

WIND won the best campaign award at Ethos Sustainability Awards 2014 for the campaign kids@safety, Internet, mobile and child.

Retail Business Awards: Best CSR Retail Strategy award

for the Social Responsibility campaign that was implemented in the framework of city Road Games "RUN GREECE", that were organised by SEGAS, in 5 cities across Greece.

BRAVO AWARDS 2014:

Best Report in Greece

WIND's Corporate Responsibility Report 2012 stood out as one of the 6 best Reports totally in Greece at the awards organised by QualityNet Foundation (GNF) under the auspices of the Ministry of Development and Competitiveness and the Ministry of Environment, Energy and Climate Change.

E-volution awards 2014:

Three SILVER awards for WIND

WIND Hellas won **three SILVER awards**, in the institution of E-Volution Awards, being the big winner in the category "Digital Communication \$ Marketing". SILVER AWARD - Design & aesthetics for the F2G website.



HR Excellence Awards:

In 2014, Grow@WIND was recognised at the HR Excellence Awards. In 2015, we will continue dynamically, evolving our system, based on the opinions of our employees.

European Excellence awards:

WIND's Corporate Responsibility Report for 2013 entered the shortlist with the 5 best reports in Europe.

WE EXCELLED

Our report is among
the best five in Europe



PARTICIPATION

Our participation in institutional bodies, industry association committees contributes to the advancement of the industry through the exchange of expertise, and of Sustainable Development issues, and enhances entrepreneurship.

In this context, the Company is an active member of:

Bodies for Sustainable Development:

- Greek Network of the United Nations Global Compact
- Greek Network for Corporate Social Responsibility
- Institute of Communication
- Council for Sustainable Development of the Federation of Enterprises and Industries
- Saferinternet.gr

Professional Bodies:

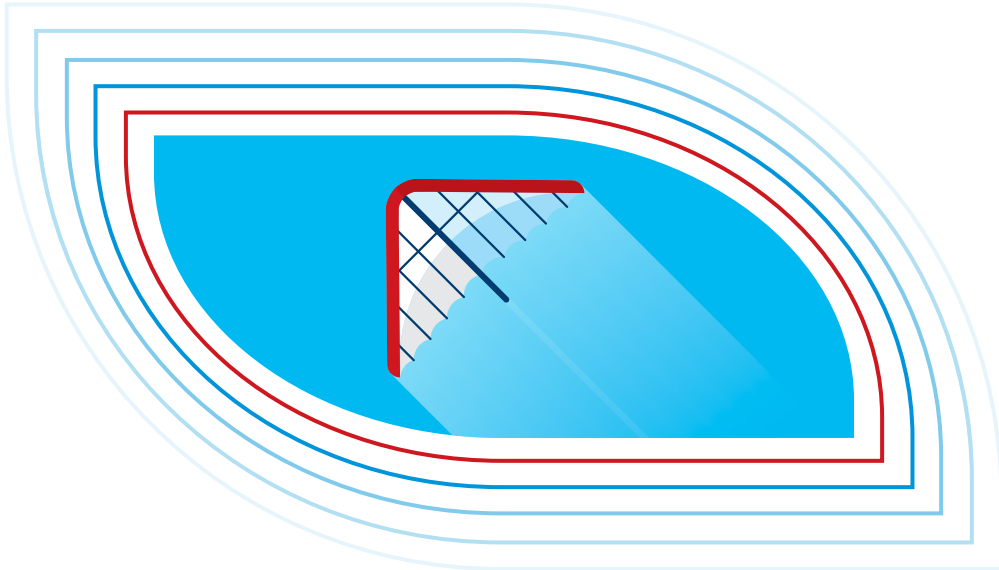
- Greek Mobile Operators Association (EKT)
- Hellenic Federation of Enterprises (SEV)
- Athens Chamber of Commerce & Industry
- Federation of Hellenic ICT Enterprises (SEPE)
- European Competitive Telecommunications Association (ECTA)
- GSM Association Europe
- Mobile Challengers
- Greek e-Commerce Association (GR.EC.A.)



Europe



4 CORPORATE Responsibility



WE BUILD PROSPERITY
FOR WIND IN THE LONG
TERM BY NOT ONLY
INVESTING IN TODAY
BUT ALSO IN THE FUTURE.

WIND IS A BUSINESS ORGANIZATION
THAT OWES TO TALK AND KEEP
PACE WITH OUR STAKEHOLDERS -
STAKEHOLDERS OF OUR SOCIETY AND
THE GREEK MARKET.

This is the philosophy of sustainable business: a company that builds its prosperity in the long term and not only investing in today but in the future as well, such as WIND, can not operate in a different war.

CSR is not «luxury», is part of our business strategy that takes society into account and evaluates the opportunities and risks that exist in its environment.

WIND supports society with both resources and manifold activities (sports, cultural, educational, environmental) thereby contributing to higher living standards and increased inclusivity.

This strategy reflects positively on the reputation and image of the company and creates mutual understanding relations with the company's stakeholders, supporting the achievement of its corporate objectives.

CORPORATE Responsibility



THE GOVERNANCE STRUCTURE OF OUR CORPORATE RESPONSIBILITY

The CSR strategy must be a long-term commitment of a company and be supported by senior management in order to create robust benefits for all parties. The commitment of the people of an organization on the values of CSR is more crucial than the available resources for a successful CSR strategy.

Only this way, Corporate Responsibility becomes a part of doing business and underpins all aspects of a company, from its products up to customers service and more focused CSR actions.

Our long-term commitment to sustainability is reflected in our overall internal environment, through actions that we develop, goals that we set and the evaluation of our results on an annual basis.

BOARD OF DIRECTORS



The Board is responsible for defining the Corporate Responsibility Strategy.

CORPORATE AFFAIRS DIVISION

The Corporate Affairs Executive Director is responsible for implementing and promoting Corporate Responsibility issues.

CORPORATE RESPONSIBILITY DEPARTMENT

The Department develops Corporate Responsibility programs and actions both in the internal and external environment of WIND, communicates with the stakeholders and coordinates the CR committee for issuing the Report.

CORPORATE RESPONSIBILITY COMMITTEE

The Committee collects data and drafts the Corporate Responsibility Report. It promotes Responsibility in our Company's internal environment.

2014

OUR CORPORATE RESPONSIBILITY STRATEGY

The Corporate Responsibility strategy we have adopted at WIND Hellas, is expressed through the program «**In Action**». Our aim is to apply our responsible strategy to our business activity, our people, the environment and society.

Thus, we are committed to:

MARKET

We offer responsible products and services, with the purpose of meeting important social needs nationwide, such as the need to communicate.

ENVIRONMENT

We minimize our environmental impact that may result from our business activity, emphasizing in reduction of energy consumption, recycling and development of our network infrastructure in an environmental friendly manner.

EMPLOYEES

We inform and mobilise our people, urging them to work as volunteers and become **ENGAGED CITIZENS**.

SOCIETY

We support Organizations and Bodies which, through their work, contribute to environmental protection and the support of people and mainly children in need.

Our responsible commitment is reflected to our Corporate Responsibility Report according to the priorities we have set to our business operation and taking into account the opinions of our stakeholders about our impact per axle.

OUR STAKEHOLDERS

Our stakeholders are determined based on their impact to our business operations. We have proceeded to their precise mapping, as well as our relationship with them.

Our stakeholders either belong to the internal environment of the Organizations (**Shareholders, Employees, Commercial Network**), or exist and act in the external environment, in Greece and/or internationally (**Regulatory Authorities, Media, Local Government, Suppliers, Partners, Customers, Central Government, Academic Society, NGOs**).

DIALOGUE WITH STAKEHOLDERS

The continuous two-way communication with our stakeholders is the focus of our operations. We work closely with different stakeholder groups and provide ongoing update about our business operations, while we receive opinions, questions and positions, which we take seriously into account. Once a year, the Corporate Responsibility department, after checking the information obtained on the basis of the reliable mechanism for comments and reviews that we have developed, taking into account the objectives of the Company, prioritizes the important issues for our Company and, afterwards, proceeds to the development of the Dialogue plan with our Stakeholders.

Our ongoing dialogue highlights issues and shapes proposals which subsequently give rise to actions, through which the Company tries to respond to opportunities and challenges that appear.



Table of Dialogue Development with our Stakeholders 2014

Table 1

EXTERNAL ENVIRONMENT

Stakeholders	Stakeholders	Priorities – Dialogue Issues
Regulatory Authorities	Participation in consultations (1) Participation in researches (1) Participation in conferences (1)	Network Infrastructures & Investments, Regulatory Obligations Quality of Services & Service Market Competition Business Continuity Issues
NGOs/Citizen Organizations	Partnerships (4) Support (1) Meetings (2)	Education & Volunteerism Health & Safety Environment Social Contribution
Central Government / Local Government	Meetings (5) Participation in local conferences / workshops (3)	E/M Radiation Economic Development Environment Investments in Technology and Infrastructure Supporting the Local Economy, Society, Cultural and Educational Institutions
Customers (Individuals – Business Services)	Customer Satisfaction Surveys (2) Focus Groups (5) Customer Service Center (1) On line Communication (1) Survey on Corporate Reputation (3) Complaint Telephone Line (1)	Technical Issues on Products & Services Communication Coverage Quality of Services Telecommunication Charges E/M Radiation
Academic Community	Support to Scientific Programs (1) Educational Seminars (5) Information Days (5)	E/M Radiation Safe use of the Mobile Phone and the Internet Education Innovation Health & Safety
Media	Press Conferences(2) Media Trips (4) Field trips (3) Meetings (1) Press Releases & Presentations (1)	Management Financial & Commercial Results Regulatory Matters Quality of Services & Network Coverage Infrastructure, Technology & Innovation Social Contribution Environmental Operations
Suppliers	Working Visits (4) Participations in Industry Associations (5) Ongoing Information & Support (1)	Procedural Matters Financial Matters Timely Delivery Safe Delivery Conditions for employees

INTERNAL ENVIRONMENT

Shareholders	Scheduled Shareholders Meetings (1) Targeted Communication (2) Conference Calls (2)	Financial Growth/Results Management Investment Plan Strategic Choices Socioeconomic Developments
Employees	Employees' Opinions Surveys (4) Newsletter Eco News (3) Intranet (1) Organization of Events (3) Meetings with Employees Union (1)	Education Health & Safety Equal Opportunities of Professional Development
Commercial Network	Extranet (Communication System) (1) Commercial Conferences (3) Meetings with Sales Executives (2) Ongoing Information & Support (1)	Corporate Governance Sharing Knowledge & Good Practices Initiatives for supporting local community needs Training in New Products & Services Customer Service Recycling, Objectives & Ecological Awareness

(1) On an ongoing basis • (2) Regularly • (3) Periodically (2-4 times a year) • (4) On an annual basis • (5) On a case by case basis



WE APPROACH IMPORTANT ISSUES RESPONSIBLY

Important Issues Recognition Procedure

The concept of Corporate Responsibility is deeply rooted in every corporate activity of WIND and reflects our philosophy on Responsible Entrepreneurship. Its aim is to further promote the principles of sustainable development, and the development of constructive dialogue with all Stakeholders for the recording of important issues, which are an area of interest for both the inside and outside environment of the Organization.

In this context, and in order to blend in with modern trends of Reporting according to the G4 standard of the Global Reporting Initiative, we proceeded to the develop of a recording process and prioritization of important issues (materiality analysis) regarding the Company.

The methodology followed was to implement a series of interviews with senior executives of the Company and conduct internal

materiality workshop with managers, representatives of the Company's departments dealing with Reporting.

At the second part of the process, a structured dialogue workshop between twenty (20) Executives of significant departments of the Company was implemented.

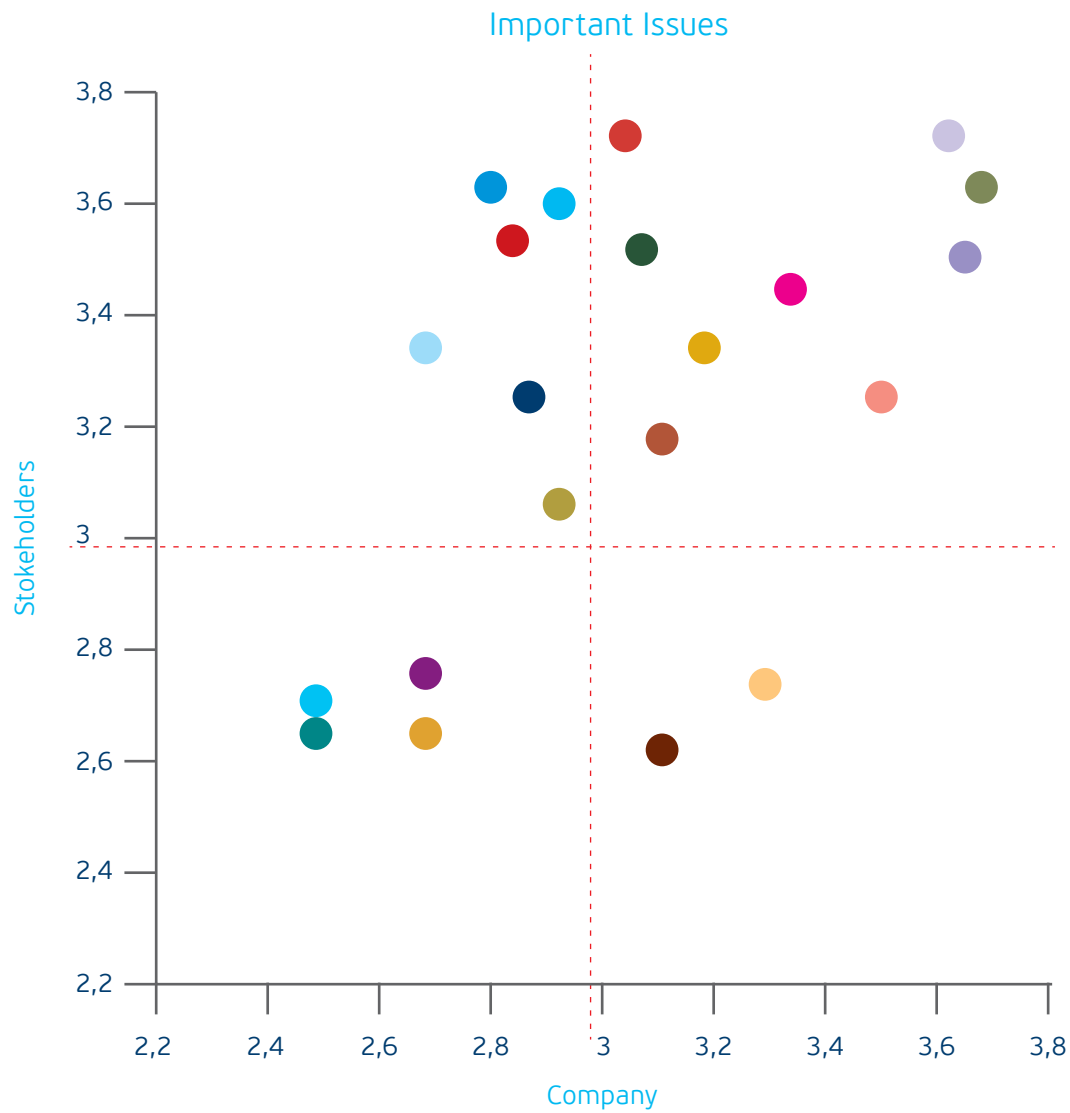
The process of Materiality Analysis was held through two lines:

- Corporate Dialogue Day, in the context of BRAVO institution, an initiative of QualityNet Foundation
- Stakeholder dialogue, through questionnaires and personal meetings with representatives of the stakeholders group of the Commercial Network and the Company's suppliers.

The final results were obtained by combining the results of the internal and external materiality analysis, and the prioritization of the issues based on the corporate and CSR objectives set by the Management.



Here are the list of important issues relating to internal and external environment, the materiality matrix, the table with the issues and limitations.



IMPORTANT ISSUES LIST

- Contribution to technological innovation through investments
- Energy saving
- E/M Radiation
- Digital Inclusion
- Employees satisfaction
- Business Continuity
- Customer experience & added value
- Social Contribution
- Financial performance in a time of crisis
- Safe use of product
- Personal Data and Confidentiality
- Employees Health & Safety
- CO₂ Emissions
- Innovation
- Fair Competition
- Partners-Suppliers Network Development
- Corruption combat
- Meritocracy
- Waste
- Compliance with environmental standards
- Open communication channels

WE PROMOTE RESPONSIBLE ENTREPRENEURSHIP & TECHNOLOGICAL INNOVATION

We actively participate in conferences that promote issues of our industry, the Greek economy and Sustainable Development as well as technological innovation, in Athens and the Greek region.



Snapshot from the Economist Conference 2014



Snapshot from Conference for «Minors protection in the Digital Age»
under the Greek Presidency of the EU Council



Snapshot from Sustainable Greece 2020

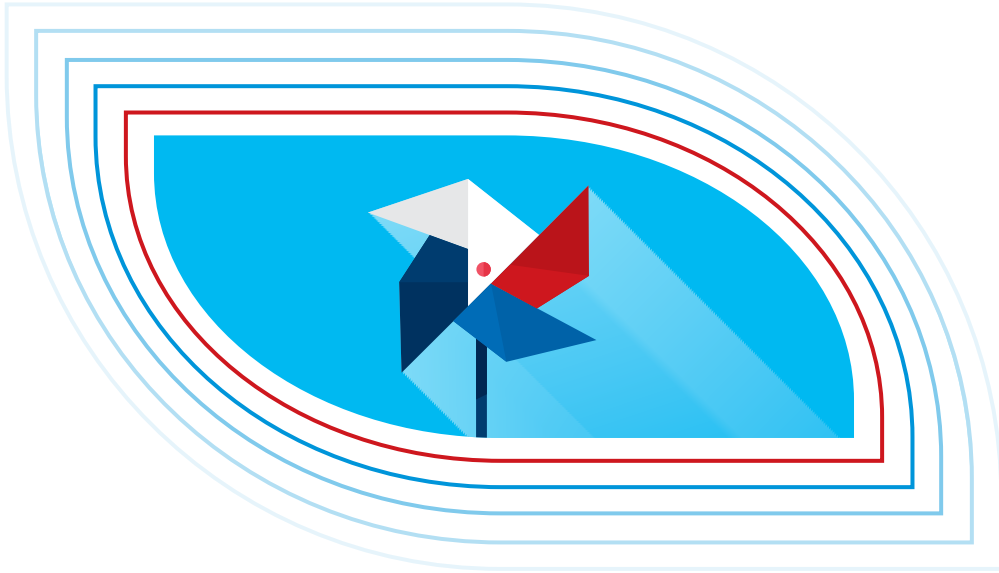


Snapshot from the Entrepreneurship and Career Panorama



Snapshot from Bravo Institution 2014

5 CORPORATE Governance



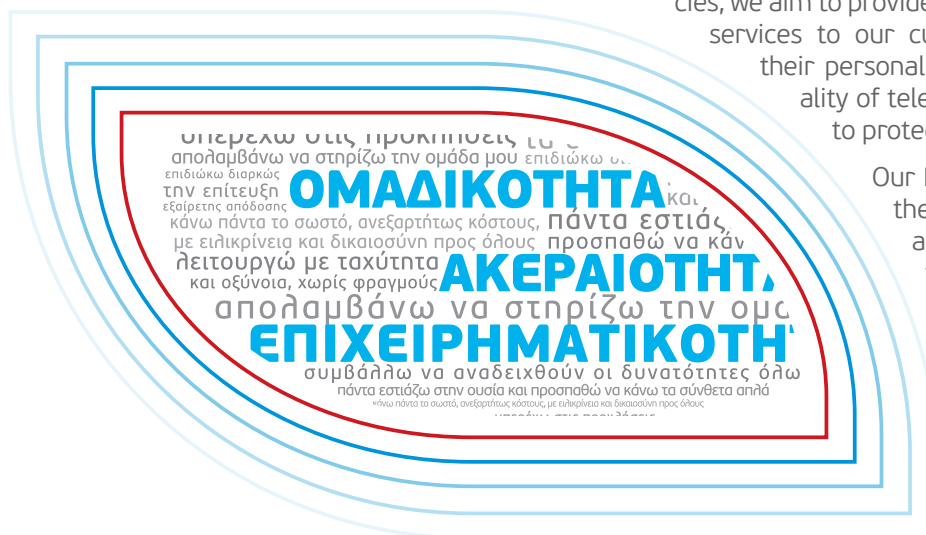
NEW POLICIES AND
PRACTICES AIMED
AT SIMPLIFYING OUR
PROCEDURES AND
RESPONDING MORE
EFFICIENTLY TO OUR
CUSTOMERS.

BEING FAITHFUL TO OUR COMMITMENT FOR RESPONSIBLE ENTREPRENEURSHIP, WE PROCEEDED IN 2014 IN CAREFULLY PLANNING OUR ACTIONS, THROUGH RESPONSIBLE PRACTICES, AUDITS, EVALUATION OF OUR DAILY OPERATIONS.

We adopted new policies and practices in order to simplify our procedures and respond more efficiently to our customers.

- Executives Conflict of Interest Questionnaire
- Over 100 procedures simplifications
- Employee training on issues relating to the Code of Conduct

CORPORATE Governance



RESPONSIBLE MANAGEMENT

WIND Hellas is a Company with Vision and clear Mission. Recognizing the fact that telecoms sector plays an important role in everyone's life, WIND supports its operations on its business Values and has established and implements policies that demonstrate its commitment to Responsible Entrepreneurship.

Our Corporate Values support its implementation, taking also into account the wishes of the employees for a better labour environment.

OUR COMMITMENT

Our commitment is to make WIND one of the best independent telecom companies in Europe, offering to our customers high quality services at the best price.

2014

OUR VALUES

INTEGRITY

I always do the right thing, whatever the cost, with honesty and justice for all.

SIMPLICITY

I keep aside anything unnecessary and keep the essence of everything I do.

FLEXIBILITY

I am quickly and effectively adjusted to market challenges.

ENTREPRENEURSHIP

I constantly seek to achieve excellent performance in my work. I take the responsibility and I am proud of it.

TEAMWORK

I actively and positively support my team. I help so that everyone's potentials are highlighted and exploited.

OUR POLICIES

Through the implementation of our Policies, we aim to provide quality products and services to our customers, to protect their personal data and confidentiality of telecommunications and to protect the environment.

Our Policies are posted in the workplace and are also available digitally to all our employees and stores through our corporate network (WIND intranet, WIND extranet) and to the public through our official website, www.wind.gr.

Quality Policy: describes the vision, the mission and the values of our Company, which are applied throughout its operations.

Environmental Policy: describes the commitment of the Company relating to the protection of the environment and the steps it takes in this direction.

Quality and Environmental Policy for WIND Stores: describes the vision and the commitment of our Company to offer to its customers high quality services and products and high quality service through the extensive nationwide chain of WIND stores, with respect to the customer, society and the environment.

Quality Policy on Electromagnetic Radiation Measurements: describes the commitment of the Company to provide services, tests/measurements, as well as assistance to the demands of our customers.

ers and our stakeholders, in compliance with the legislative framework and the internationally accepted practices and standards.

Data Security Policy for the Protection of Communication Privacy: under the current regulatory framework and following the approval of the Authority for the Protection of Communications Privacy we apply the Security Policy for the Protection of Communication Privacy internally and impose it on contractual relations with third parties whose scope is related to accessing and handling such data.

The objective of this policy is to protect communication data and information communication systems from potential risks in order to ensure the confidentiality of communications.



MANAGEMENT PRACTICE

WIND Hellas is a Société Anonyme. According to its Articles of Association, the supreme body of the Company is the General Meeting of the Shareholders, which may reach decisions on any matter pertaining to the Company.

The management and representation of the Company and the management of its corporate assets fall under the remit of the Board of Directors, which may consist of three (3) to fifteen (15) members.

BOARD OF DIRECTORS

The current Board of Directors (BoD) of the Company, which was elected in January 2011, consists of the Chairman and two Members. The Chairman of the Board of Directors also acts as CEO. The BoD members take part in its meetings and jointly decide on the items on the agenda:

In 2014, the BoD was comprised of the following members:

■ Athanassios Zarkalis, Chairman and CEO, Executive Member

■ Ioannis Palaiokrassas, Independent, Non-Executive Member,

■ Georgios Rallis, Executive Member

According to our statutes into force, there is no distinction of the Board of Directors in «executive» and «independent - non executive».

However, and in accordance with the Company's BoD decision dated 24.01.2011, which established the incumbent BoD into a body, the BoD members are distinguished into executive and independent, non-executive members.

Two Executive Members and one Independent – Non-Executive Member sit on the active BoD.

The BoD members are chosen on the basis of their sensitivity to economic, environmental and social issues and their primary obligation and duty is to continuously strive to

improve the Company's economic position on the telecommunications market and to protect corporate goals and prospects.

The frame transparency with which we operate, dictates relevant restrictions and commitments for members of the Senior Management, as provided for in our statutes.

Thus, in accordance with article 27 of the Company's Articles of Association, it is forbidden for BoD members and Company managers to act in competition to the Company, professionally on their own account or that of third parties or to participate in companies without the permission of the General Meeting.

Furthermore, the above persons must, in a timely manner, disclose to the Board of Directors any personal interests that they may have in Company transactions which fall within their duties, as well as any conflict of interest with the Company or its affiliated businesses.

COMMUNICATION WITH MANAGEMENT

The constructive two-way communication between Employees and the Board of Directors helps keep everyone abreast of Company related developments at all points in time, to the effective handling of the issues and needs arising at a human resources level, to reinforce teams collaborating with each other and help tap into the power of constructive dialogue. Within this context, in 2014, the CEO had meetings with executives from all departments in the Company.



Accordingly, and in order to define the strategy of achieving the investment plan of the company, we communicate systematically with shareholders, at regular intervals, in order to inform them for the Company and the Greek market in general.

THE COMMITTEES

CEO



EXECUTIVE MANAGEMENT COMMITTEE



The Executive Management Committee, which consists of the CEO, the Chief Officers and Executive Directors, decides on day-to-day Company matters.

It reaches important decisions with respect to daily operations and the Company's oversight, dealing with problems that may arise and drafting individual strategies, always according to the decisions of the Board of Directors and general authorizations given at the Largo Limited level, the parent company of the Company.

COMPLIANCE COMMITTEE



An executive Compliance Committee, which consists of:

- The CEO
- Chief Human Resources General Manager
- Legal Counsel
- Chief Financial Officer
- Internal Audit & Compliance Manager

The main aim of the committee is to oversee the Compliance Management System.

It deals with compliance issues affecting internal and external functions of the Company with respect to its principles and values, the implementation of the Code of Conduct as well as issues of corporate governance.

The Committee met in 2014 4 times on issues related to the implementation of the Code

Among the decisions of the committee where:

- The removal of a procedure as unacceptable under the company's values

Among the decisions of the committee where:

- The creation of new procedures
- The final approval of the Fraud Response Policy
- The annual training program of the Compliance System

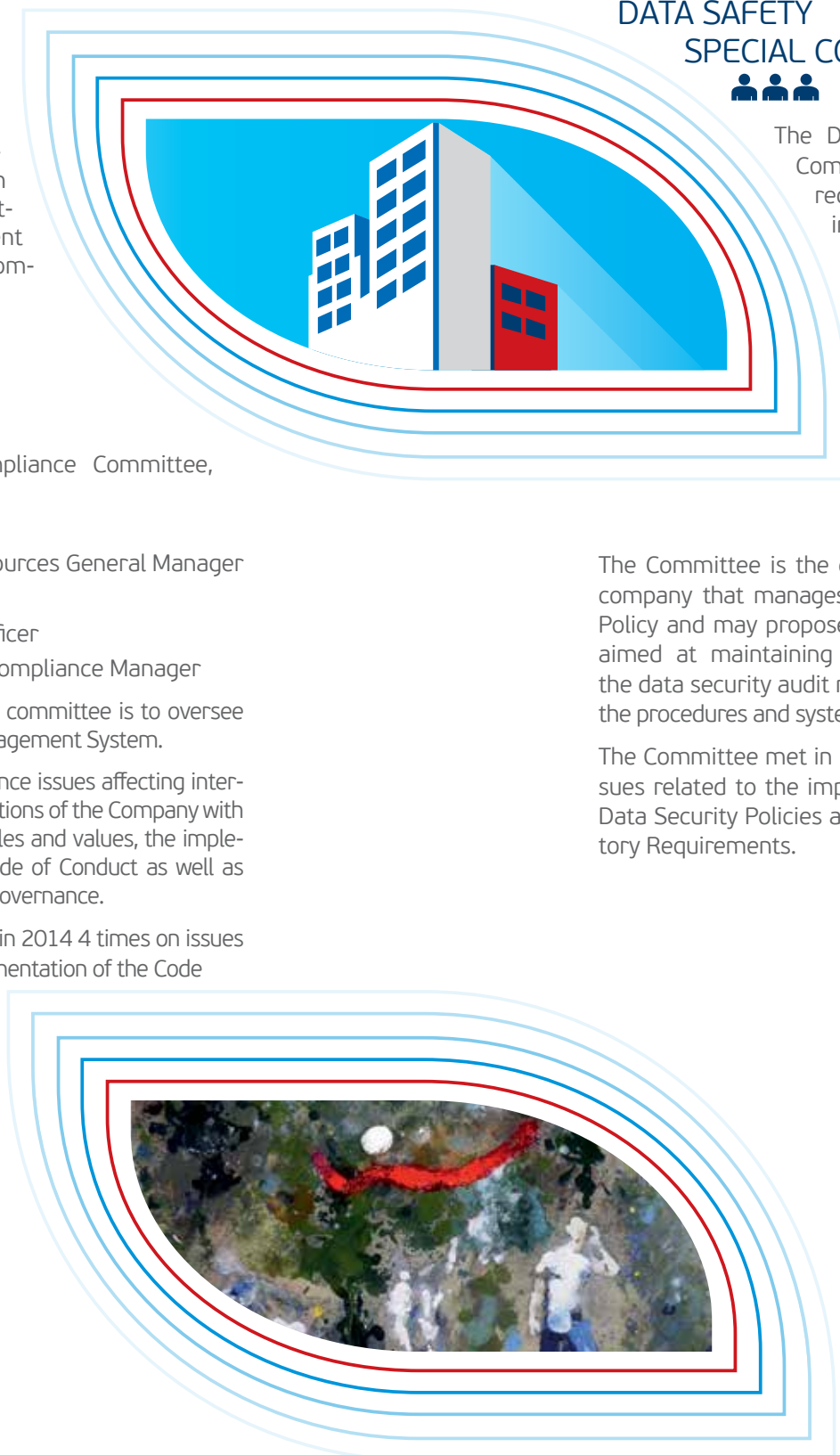
DATA SAFETY SPECIAL COMMITTEE



The Data Safety Special Committee meets at regular intervals aiming to the creation of a corporate Information Security Policy and its implementation by the employees, in order to ensure security, confidentiality and integrity of data.

The Committee is the central body of the company that manages the Data Security Policy and may propose corrective actions aimed at maintaining and strengthening the data security audit mechanism through the procedures and systems of the Company.

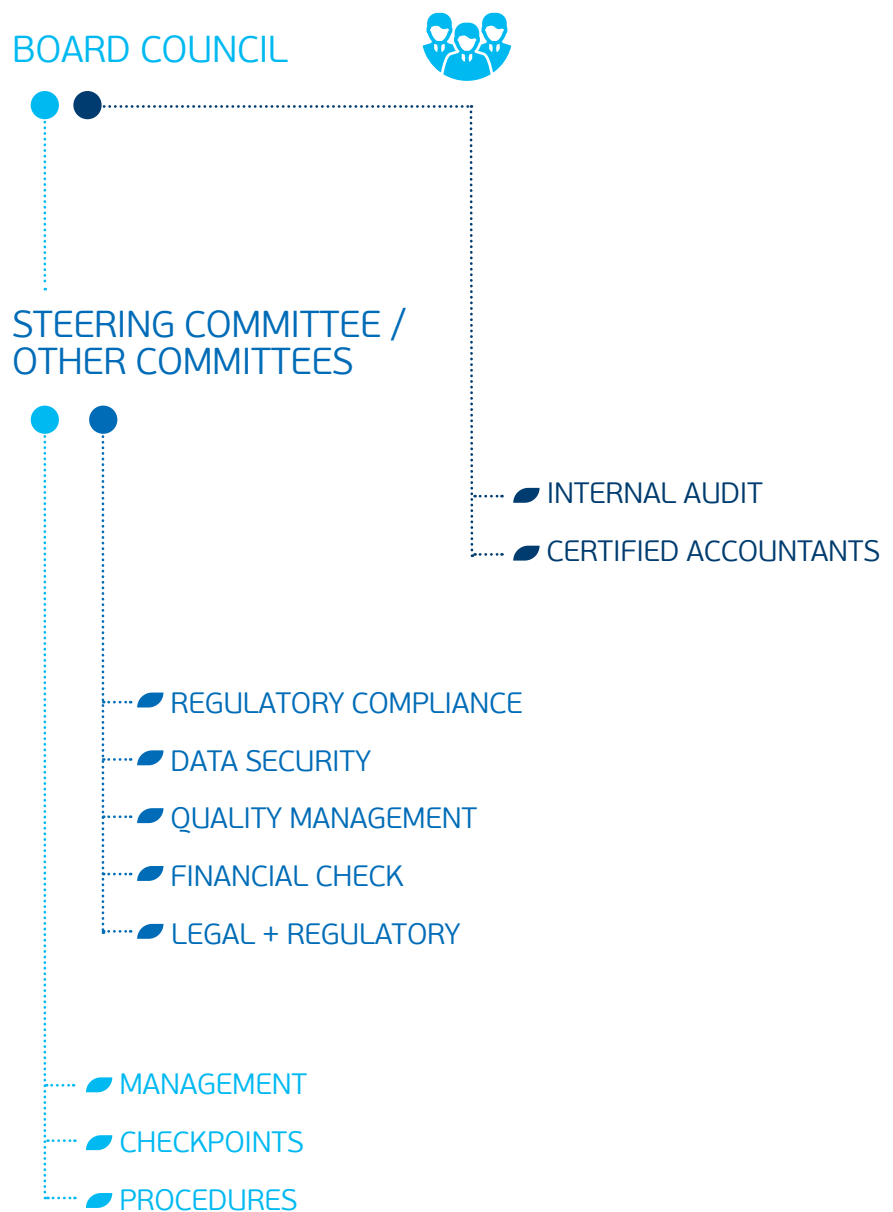
The Committee met in 2014 2 times on issues related to the implementation of the Data Security Policies and the new Regulatory Requirements.





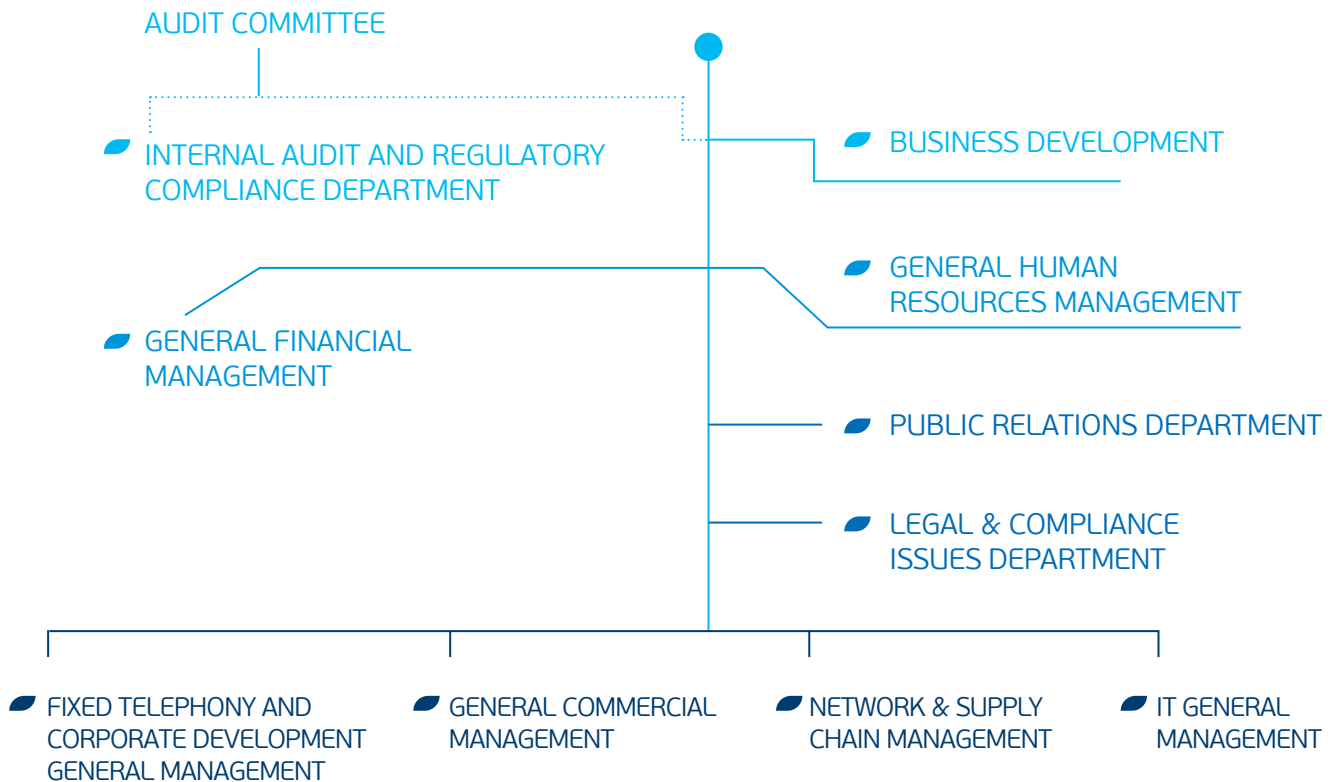
CORPORATE GOVERNANCE STRUCTURE CHART

WIND Hellas Corporate Governance Structure follows the model of three lines of defense



ORGANIZATIONAL STRUCTURE

PRESIDENT & CEO



INTERNAL AUDIT

The **Internal Audit & Compliance Division** is responsible to provide reasonable independent assurance to the Board of Directors of the parent Company that the Internal Control System ensures compliance with Company policies, practices and procedures. This is accomplished by assessing the effectiveness of risk management systems, controls and governance practices.

Management is responsible for designing and operating the internal audit system, while line Managers are responsible for establishing the appropriate policies and procedures in order to assist the Company in achieving its predetermined objectives.

Through the **Audit Committee**, the parent company Largo Limited, which consists of 3 independent non-executive directors, the organizational independence of the Internal Audit & Compliance Division is achieved, since the Committee reports directly to the Board of Directors of the parent Company. The Audit Committee assesses and supports the work of the Management, ensures the sufficiency of human and technical re-

sources and the unhindered access to information related to the audits. The Committee is convened at least **4 times annually**, and is informed about any audit findings and recommended corrective actions, monitoring their progress over time. The Internal Audit Manager meets monthly the Chairman of the Audit Committee for matters relating to the Company and the Management.

The Internal Audit & Compliance Division, in collaboration with Senior Management and Line Managers, carries out annually a Company-wide self risk assessment in order to identify the operational risks and draw up the annual audit plan. Risk identification and risk assessment is performed and specific processes where audits will be made are defined. Audit reports resulting from the conducted audits are submitted to **Senior Management** and the **Audit Committee**.

In 2014 the Internal Audit and Compliance Division passed an External Quality Assessment (External Quality Assessment) from the company PwC, according to the 1312 Standard of IIA Professional Practice. This evaluation con-

firmed that the Division operates in compliance to the IIA Internal Audit Standards. Based on recommendations of the evaluators, the Division devised a strategic plan for the years 2015-2017.

COMPLIANCE SYSTEM

CODE OF CONDUCT

We operate under the «**Code of Conduct of WIND Hellas**», in order to create the right framework in line with the principles of good faith, business ethics and professional ethics, in order to give the opportunity to all employees to acquaint themselves with the rules and principles of good practice and ethics that we have adopted. The Code of Conduct sets out the relationships both among our employees and any third party they contact in the context of their work.

At the same time, we have created channels for named or anonymous complaints of breaches of the Code. Complaints can be made either online through the e-mail address codeofconduct@WIND.gr or by mail at the Mailbox: WIND Hellas PO Box 61336 151 04 Maroussi, Athens, Greece. In 2014, 21 reports were sent electronically or by mail, the majority of which were customer complaints issues. The planned internal investigation procedures were followed, and there was no violation of Company policy or intent of non-application of values and practices.

In the contexts of the Code of Conduct, during the second semester of 2014, 14 presentations to the employees of WIND took place concerning the Code of Conduct. These presentations included:

- Clarifications about the Code
- Analysis of the company's corporate governance system
- Citation of examples from the daily operation of the company

Our goal for 2015 is to further reinforce the message of integrity in WIND Hellas through presentations and speeches to the entire staff.

During the first quarter of 2014, all executives of the company completed a conflict of interest questionnaire, where they were obliged to declare any situations, as identified in the questionnaire. Then, the Compliance Committee decided whether those are a causes of conflict of interests and what measures should be taken.

The following policies support the Code of Conduct:

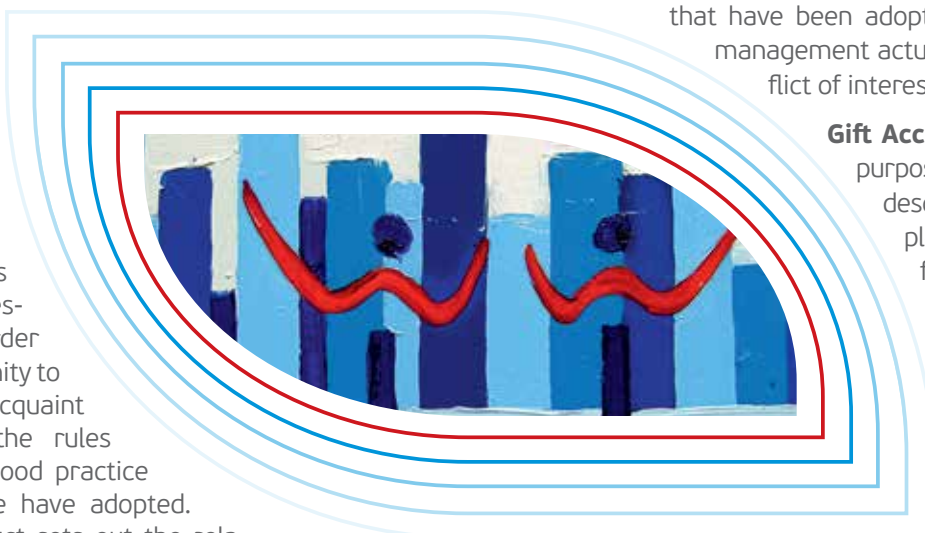
Conflict of Interests Policy: The purpose of this Policy is to describe the principles that have been adopted in regard to the management actual and potential conflict of interests.

Gift Acceptance Policy: The purpose of this Policy is to describe the basic principles of behaviour to be followed in the case that gifts, entertainment, promotions or any other form of benefits are offered, in order to avoid situations that either pose or may pose a risk and question the

independence, impartiality or integrity of our employees' judgment.

Fraud Response Policy with main directions:

- awareness of our employees regarding the meaning and prevention of fraud ,
- guidance for what they have to do in case they perceive similar cases or suspect that similar acts are committed, so that a single operational behavior and culture is formed on how to prevent and deal with them,
- description and definition of the relevant actions that must be taken by the competent bodies in case of a fraud incidence, and
- facilitate the development of systems, procedures and control mechanisms that help to prevent- and combat fraud.



INTERNAL LABOUR REGULATION

The transparency and integrity in the way we operate is described in the Internal Labour Regulation we have prepared and apply.

This regulation promotes moral values, respect for laws and good business practices and the creation of the appropriate labor environment.

The Internal Labour Regulation is accessible to all employees through our corporate intranet (WIND Intranet).



- Repair of Mobile Telephony Devices
- After Sale Service for Retail and Corporate Customers

The **Quality and Environmental Management System** we apply is certified according to the requirements of the following international standards:

• **Quality:** EN ISO9001:2008

• **Initial certification:** 2001

Certificate Registration No. 04 100 011460

• **Quality:** EN ISO9001:2008

• **Initial certification:** 2001

Certificate Registration No. 04 100 011460

• **Last certification renewal:** 2014

Certification Body: TUV Hellas (TUV Nord Group)

• **Environment:**

EN ISO14001:2004

• **Initial certification:**

December 2008

Certificate Registration

No. 44104090360-000

• **Last certification renewal:** June 2012

Certification Body: TUV Hellas (TUV Nord Group)

MANAGEMENT SYSTEMS AND CERTIFICATIONS

We apply a **Comprehensive Quality and Environmental Management System** that covers all our facilities and its scope of application includes:

- Design, Development, Provision, Sales, Billing and Support of comprehensive telecommunication products and services (mobile and fixed telephony, data, internet and broadband) for retail and corporate customers,
- Design, Development, Realization, Operation, Support and Maintenance of telecom & IT infrastructure, telecom and data networks, IT systems and applications,
- Design, Development, Monitor, Audit and Support of WIND branch stores.

The application of the Quality and Environmental Management System in WIND stores includes:

- Sales of Mobile and Fixed Telephony and Internet (WIND mobile, Q Prepaid, WIND Fixed Telephony and Internet)
- Retail Sales of Mobile & Fixed Telephony Devices, Electronic Equipment and Accessories



ISO 17025: Electromagnetic Fields Measurements

We develop our network with responsibility and sensitivity to public health and the environment using partners who have high-frequency Electromagnetic Fields Measurement Laboratories accredited according to the requirements of **ELOT EN ISO/IEC 17025:2005** by the National Accreditation System (ESYD).

Business Continuity Management

At WIND we have developed and we always improve a Business Continuity Management System with the following main objectives:

- to ensure the safety of our employees, our partners and our customers
- to ensure the integrity of our infrastructure
- the uninterrupted supply of services to our consumers
- the compliance with legal, regulatory and statutory requirements

In the context of our system, as well as the obligations arising from Gov. 305/14-2-2012 (EETT: Decision No. 7560/153) and 1742/15-7-2013 (ADAE: Decision No. 205/2013), we apply policies, procedures, measures and plans that help to ensure the continuity of supply of our services.

At the same time, and recognizing the importance of ensuring the availability of telephone services to the public, we developed channels of communication and we actively participate in the social dialogue with all relevant bodies, suppliers, other providers and regulatory authorities aiming to the uninterrupted access to emergency services and other telecommunication services, particularly in cases of destructive damage or force majeure.

Simplifying Procedures

Aiming to create a stable feedback channel and optimise our processes, we redesigned the program **«You see things simply?»**

And in 2014 over **200 proposals were received** and studied while most of them were either implemented during the year or their implementation is underway.

Through the program, the three best ideas were awarded, which were presented to Management Team.

We redesigned major corporate processes in cooperation with cross-functional teams in order to increase our effectiveness, such as the management of network parameters, the submission of offers to corporate clients and many others. Furthermore, consistent with the value of simplicity, we continued **to review our internal processes**, automating and / or reducing the sanctioning levels in processes such as the management of expenditure and ordering in order to keep the substance in everything we do.

**WE SIMPLY
OUR PROCEDURES.
WE BECOME
MORE EFFECTIVE!**

■ Aiming to create a stable canal feedback and optimisation of our procedures we redesigned the program **“Do you see things simply?”** and in 2014 **over 200 proposals were collated** and studies, while most of them were either conducted during the year or their completion is under progress..

Through the Program, 3 of the best ideas were awarded and were then presented to the Management team.



IMPLEMENTATION

Overall, we implemented over 100 simplifications in 2014, contributing in many ways to improve our operations

6 SOCIETY



WE OPERATE
RESPONSIBLY TOWARDS
SOCIETY BY OFFERING
FINANCIAL SUPPORT TO
ACTIONS OR BODIES,
BY OFFERING TO OUR
FELLOW CITIZENS WHO
ARE REALLY IN NEED BY
ANY MEANS WE HAVE
EACH TIME.

FOR YET ANOTHER YEAR,
WE TOOK SERIOUSLY THE NEEDS OF
SOCIETY AND INTEGRATED THEM IN
OUR CORPORATE OPERATION.

We supported innovative ideas promoting volunteerism, social solidarity, sports, education, environmental awareness and culture.

- For the 2nd year we supported the City Games program Run Greece
- We supported the Thermaikos Gulf cleaning program

WE CONTRIBUTE TO SOCIETY

In 2014 we modified our plan emphasizing on the support of actions and bodies in order to help them implement their plans.

Last year, we worked consistently on a concrete action plan that grew around the axes of participation, awareness and contribution.

We support society both with resources and manifold activities (sports, cultural, educational, environmental) thereby contributing to higher living standards and increased inclusivity.

This strategy reflects positively on the reputation and image of the company and creates mutual understanding relations with the company's stakeholders, supporting the achievement of corporate objectives

SOCIETY

2014

In accordance with our reviewed strategy, in 2014, we worked in upon a specific actions plan that is developed around the following axis:

PARTICIPATION ► AWARENESS ► CONTRIBUTION

PROGRAMS MANAGEMENT PLAN

1. Research and tracking of social need

2. Action designing/ planning

3. Monitoring and Evaluation of the action/program on the impact to Society

4. Exploration & selection of action/ program for the coverage of the need

5. Implementation of action/program with the cooperation of all our stakeholders



PARTICIPATION

RUNNING MOVEMENT
THOUSANDS OF PARTICIPATIONS
AN IMPORTANT GOAL

64.000 RUNNERS

2.619 WIND
RUNNING TEAM RUNNERS

146.000€ IN
ORGANISATIONS OF SOCIAL
SOLIDARITY

For one more year, we participated in one of the biggest solidarity initiatives implemented in our country. Aiming to link sports with social solidarity, for one more year, we gave everyone the opportunity to participate and run in the colors of **WIND Running Team** for a good cause.

In 2014, the participation in the run races of the **9th International Marathon «Alexander the Great»** exceeded all previous organizations of Marathons «Alexander the Great», now positioning the particular game as the biggest sporting event in Northern Greece.

More than 104.800 runners, adults and children, participated in the event and passed under WIND Arch of Love.

Through the participation of 1000 runners of WIND Running Team, 8 celebrities and the Arch of Love, we collected **35.000€** in

order to support the **Association of Parents and Friends of People with Vision Problems and Additional Disabilities «AMYMONH»** – Association of Thessaloniki and Charitable non-profit association of friends of children with cancer the «**STORGI**».

For one more year, WIND creates a strong social footprint and support, while the increase of participations is worth noted, confirming the acceptance of the institution by the public and making the race an important social and cultural event for the city of Thessaloniki.

Accordingly, in the context of the **32nd Authentic Athens Classic Marathon** in November 2014, we supported the work of the **ARC OF THE WORLD** and **ELIZA** - Company against child abuse - with the participation of 35.000 runners in total.

Before and after the race, we activated a series of «mechanisms» for the support of the two institutions.

With the participations of WIND Running Team, 15 celebrities, the Arch we collected a total of **63.000€**.



RUN GREECE

For the 2nd year the institution Run Greece with the support of WIND managed to literally pull out from their homes more than 15,000 runners of all ages, transforming every city into a great celebration of sport and participation.

WIND exploited this dynamic since it managed to leave a strong social footprint offering a total of 38,000 euros in 5 social organizations.



CONTRIBUTION



BOOK BAZAAR

5th charity book bazaar and music festival
BHMA FM 99,5

ANIMAL ACTION

We support the effort of taking care «homeless» animals in cooperation with Animal Action.

«On the occasion of World Animal Day, Animal Action sends a message for action! All together – groups of civilians, NGOs, companies, municipalities, regions - help improve the living conditions of animals in our country. For the 4th consecutive year, WIND stands in our actions and transmits CSR courses for everyone even for our four-legged friends! We thank them! «Said the Managing Director of Animal Action, Amalia Sotirchou.



1000 miles for children

I am very proud that, accompanied by Helen and Apostolos, I will cross 1000 miles by my bike, especially because I will become a part of this unique and original route. «Athlos» was my dream and I am pleased that it will come true with the support of WIND. Every mile will represent every child of Floga and through «Athlos» I ask for your help and support, «said Thanassis Tsaklas during the press conference where the «Athlos» action was announced.



THERMAIKOS GULF

WIND participated for the second year in the waste and pollution load management program of Thermaiko Gulf, of the Ministry of Macedonia and Thrace, supporting this very important initiative for the city of Thessaloniki.

The aim of the program was the cleaning of Thermaikos Gulf surface from floating waste and possible oil spills, on a daily basis.



WIND OFFERED TO EARTHQUAKE VICTIMS RESIDENTS OF KEFALONIA AND ITHACA

In early 2014, WIND, from the first moment, stood by the side of its subscribers in areas that were affected by the earthquake of Kefalonia and Ithaca, and installed a local support team for immediate remedy of any technical issues due to natural phenomena at the network of Fixed, Mobile Telephony and Internet.

Finally, especially for subscribers in the affected areas, WIND offered special deals in order to meet their increased needs.





WIND BUSINESS DAY

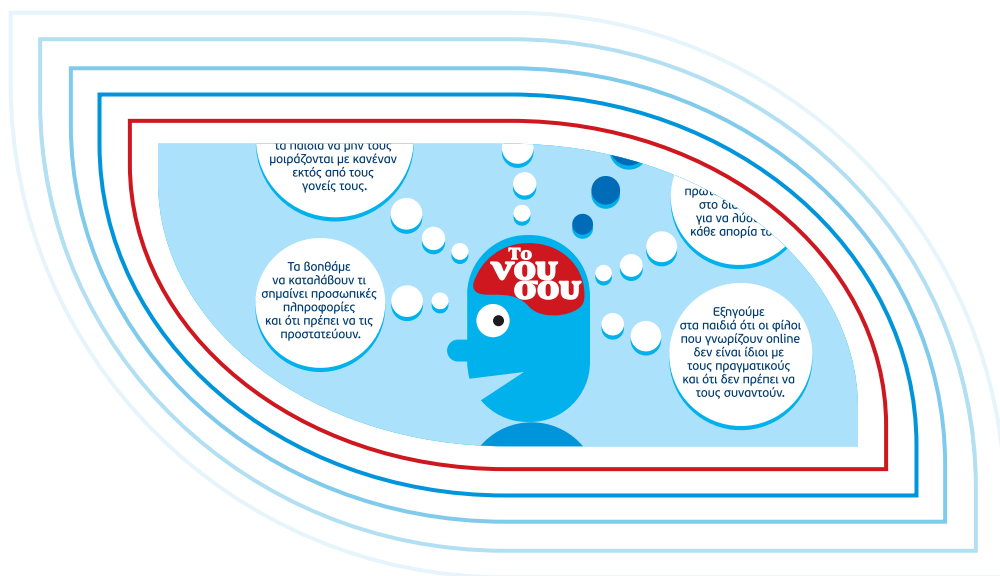
In 2014, we participated in the Business Days institution under the Entrepreneurship and Career Panorama organized by the Research Centre for Strategic Management of Companies and Entrepreneurship. In order for the university student community to get to know the business world and the labor market, the WIND Business Day 2014 took place on the premises of our company in Athinon Avenue with the participation of 40 students from various academic directions. Experienced executives of the company had the opportunity to transfer knowledge and experiences about the telecommunications industry each one at his level of specialization. At the end, the participants took part in specially designed workshops on marketing and corporate responsibility in the telecommunications industry.



kids@safety

internet, mobile phone and child

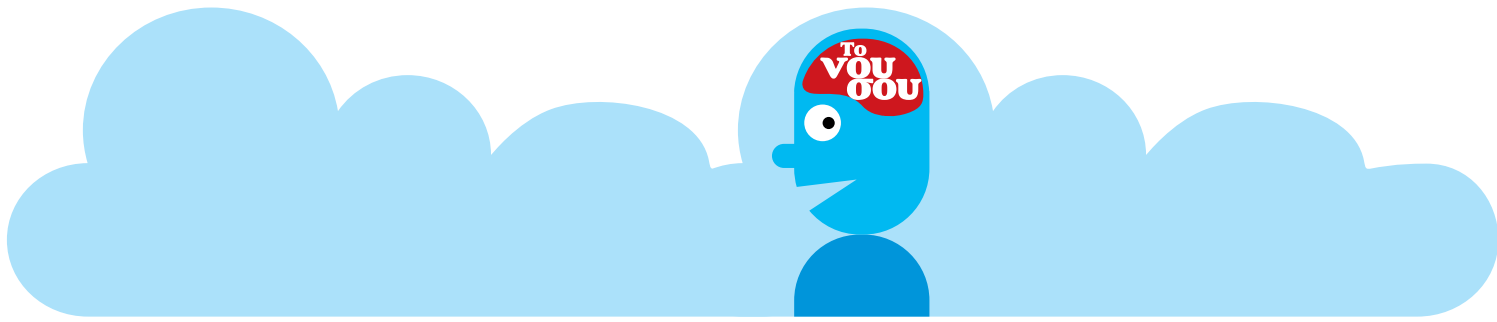
«Today children use computers and the Internet much before they learn how to ride a bike». This phrase, combined with survey results showing that children spend too much time on the internet without the necessary guidance from their parents, led to the creation WIND kids@safety, internet mobile phone and child campaign. In 2014 the expedition completed four years during which several actions were implemented.



According to the data recently presented at the 3rd Conference on Safe Surfing at the Internet conducted by the Cyber Crime Force of the Attica Security Department:

50% of smartphones/ tablets users are sleeping with devices at a distance of «their hand»

64% of users are not aware of the dangers of Internet



57% do not know the existence of security software for mobile phones

50% do not use protection and precautionary measures (password, security software, back up)

56% have access to social network accounts

39% do not take special measures for the use of public wi-fi connections, while 3 out of 10 do not disconnect from public wireless networks

IT IS AN INTEGRATED AWARENESS PROGRAM FOR PARENTS THAT AIMS TO INFORM OUR SUBSCRIBERS AND AFTERWARD THE PARENTS OF ELEMENTARY AND SECONDARY SCHOOL STUDENTS IN GREECE.

An essential advantage of the initiative of WIND is the integrated communication platform, the creative approach «Your Mind» and the exclusive strategic partnerships with eminently competent bodies in this field, such the Cyber Crime Force and Saferinternet.gr.

In 2014, WIND supported the highly dynamic plan of action of the Cyber Crime Force Department helping to promote safe use of the Internet by children.

Thus, actions like the following were implemented:

- **Launch of the Digital Playground www.cyberkid.gr**
- **Creation of the Cyberkid app for smartphones with unique features such as news alerts and the Cyber-alert phone number for emergency calls**
- **And the Presentation of the cyberkid action in Thessaloniki International Fair**

In recent years, WIND consistently participates in conferences, speeches, meetings in order to speak as much louder as possible about a better and safer internet for our children.





2nd MULTILINGUALISM FESTIVAL

Another important initiative we supported in 2014 was the 2nd Multilingualism Festival.

The Municipality of Thessaloniki in the context the activities of the Education and Sport Directorate through the Department of Programs and Lifelong Learning, in collaboration, with the Municipal Company of Information, Spectacle and Communication and other bodies, conducted the **second Festival of Multilingualism at the premises of the City Hall of Thessaloniki.**

During the event 105 bodies participated and will present 220 different actions, such as theatrical and musical events, educational projects, research programs, Multilingualism workshops, experiential intercultural activities, language presentations, historical records of linguistic paths of Thessaloniki, critic paragrammatism and multilingual literacy workshops, comic creation, photography exhibitions and many other activities.

TEDx

THROUGHOUT GREECE

TEDxHeraklion

05.02.2014

TEDxAUEB

10.03.2014

TEDxUniversityofPireus

26.04.2014

TEDxThessaloniki

10.05.2014

TEDxMonemvasia

27.07.2014

TEDxAcademy

27.09.2014

WIND: TELECOM PARTNER @ TEDx

Since 2011, WIND gives the «present» in a series of TEDx events throughout Greece.

In this way the company supports people who have «a fresh air», people with determination, creativity, initiative, leadership, risk.

TED (Technology, Entertainment & Design)

TED is a nonprofit organization that promotes ideas worth spreading.

The aim of TED is, with the power of ideas, to be able to motivate people to change their lives and the world.

The TED.com has become a platform where millions of people share the knowledge of today and tomorrow.

TEDx take place worldwide in cities like New York, Sydney, Dubai, London, Amsterdam, etc.



WIND FOR VOLUNTEERISM

In 2014, we gave particular emphasis to the promotion of Volunteerism supporting the GloVo initiative (Global Volunteers).

It is a global voluntary platform that allows people from around the world to participate as volunteers in events and actions in accordance with their capabilities, the place they live and their interests.

GloVo was founded by a group of students in September 2012 during the Athens Startup Weekend University, an entrepreneurship competition in which GloVo won the second prize.

Today there are nearly almost 5,000 registered volunteers, there have been more than 100 events and the page on facebook has more than 11.000 likes and more than 50 voluntary actions have been completed.

WIND supports the vision of GloVo to create and spread a community where young people are active citizens and through volunteerism they grow, learn and act.



SOCIAL PRODUCT

We firmly believe that technology can help vulnerable social groups. Thus, we contribute to meeting their telecommunications needs aiming to reduce social exclusion.

WIND CARE

We provide the option to people with disabilities (hearing impaired, families of individuals with severe learning disabilities, autism, physical and multiple disabilities) to communicate via SMS at half-price. Individuals who are entitled to join the program may be new or existing subscribers with postpaid or prepaid packages.

SOCIAL CONTRIBUTION LINES

The «I offer» service

This is a joint charitable initiative of the three mobile telephony operators in Greece, which began in February 2006. The service involves the activation of a common 5-digit number for a specific period of time; during which mobile subscribers are able to send as many SMS as they wish (at a cost of €1 + VAT).

Thus, they are able to financially support a non-profit or non-governmental organization every time they do so.

In 2014, the service was activated 16 times and the amount 23.720 Euro was gathered.

The total net revenue (excluding VAT) generated from the use of the service is given to the eligible organization or institution that organized the charity, without any deduction.

The amount gathered in 2014, through «I offer» for various organizations, was 21.974€ (excluding VAT).



**SOS
CHILDREN
VILLAGES**

Since December 2011, we give our subscribers the opportunity to donate €2 to the SOS Children's Villages by calling 14567.

In 2014, wind subscribers donated 6530€ to SOS Children villages (exclude VAT).



Since December 2011, we give our subscribers the opportunity to donate €2 to the Ark of the World by calling 14849 or by sending SMS to 54232.

In addition, since November 2014, our subscribers can donate 2 € sending message to 19888.

In 2014, our subscribers donated 5981€ (excluding VAT) to the Ark of the World.



Βήματα Ζωής
για το Παιδί με Αναπηρία

Since February 2014, we give our subscribers the opportunity to donate 2 € to ELEPAP by sending a message to 54980.

In 2014, our subscribers offered 649,40€ (excluding VAT) to ELEPAP.



HELP LINES



Through our telecommunications network throughout Greece, our customers are able to participate actively in the process of locating either a missing or abducted child via SMS to 1056 from their mobile.



We support the European helpline for children **116000**, through which cases of missing children can be easily and quickly reported for free or through which assistance for children in need can be arranged. The 116000 number now also functions for sending free SMS messages.



The support line for children and adolescents, **116111**, is a toll-free phone number which any child or adolescent up to 18 years of age can call in order to speak with qualified mental health counsellors. WIND acknowledges the importance of preven-

tion and treatment of mental health problems related to childhood and adolescence by offering its subscribers access to this phone number.

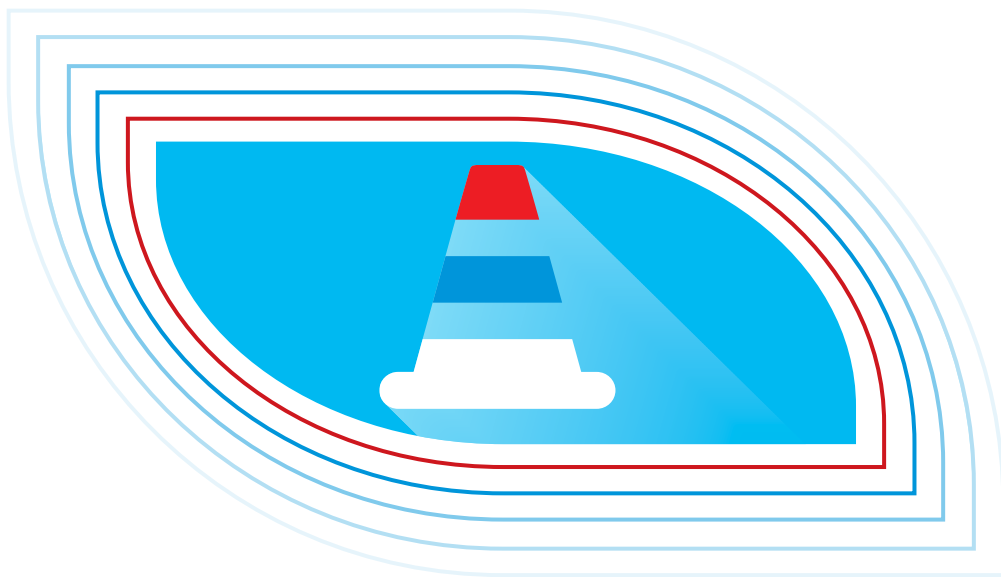


We offer our subscribers the opportunity to call 1056 free of charge from their mobile, thus helping to deal with serious incidents in which children are the victims. Moreover, we give them the opportunity to donate 2,01€ by calling 14545 (since November 2014, the SMS costs 2,00€). **In 2014, 133.159€ was given to the organization "Smile of the Child".**

EMERGENCY LINES

We give our subscribers the option of free calls and SMS messages to emergency numbers such as 100, 166, 199, 112, 197 and 108, even in case of barriers due to debts.

7 EMPLOYEES



THE SOCIALLY
RESPONSIBLE
OPERATION OF A
CORPORATION AFFECTS
POSITIVELY ITS
RELATIONSHIP WITH ITS
PEOPLE, AS CONFIRMED
BY THE ANNUAL
EMPLOYEE OPINION
SURVEY CONDUCTED
BY WIND

IN FACT, IN A RECENT SURVEY, **84%** OF WIND EMPLOYEES COMMENTED VERY POSITIVELY THAT THE COMPANY DEMONSTRATES SOCIAL RESPONSIBILITY.

A prerequisite for success in the internal recognition of the CSR is not only informing but also urging employees to participate in the whole range of socially responsible activities of the company.

- Consolidation of our new Values
- Design of development programs WIND-isU, leadership Customer Service, Customer Development, Sales Excellence
- Optimization of organization and operation
- Simplification of multiple procedures and redesign of major procedures
- Support and coordination of Customer Experience Program
- Successful Implementation of employees Survey Action Plans
- Loyalty programs for excellent results
- Improvement of Benefits
- Modernization of infrastructure and workplaces

EMPLOYEES

DISTRIBUTION OF EMPLOYEES/ DEPARTMENT	
Department	Total
General Manager and other Administrative Departments (Quality, Physical Safety, Internal Audit, Legal & Regulatory, Corporate Relations, Supply Chain & Facilities Management)	33
Human Resources Department	21
Commercial Department	451
Fixed Telephony & New Business Department	16
Financial Department	91
IT Department	126
Network & Supply Chain Department	237
Grand Total	975

(Data: 31/12/2014)



HUMAN RESOURCES DATA

At WIND, we aim to attract, retain and develop professionals who are able to think beyond the usual mindset.

Within a dynamic environment of new technologies, extraordinary people who are passionate about learning and development can make their way towards an exciting career.

During 2014, we contributed significantly to the Greek economy by employing 975 individuals.

2014

DISTRIBUTION OF EMPLOYEES/ DEPARTMENT & GENDER			
Department	Gender	Number	%
General Manager and other Administrative Departments (Quality, Physical Safety, Internal Audit, Legal & Regulatory, Corporate Affairs, Supply Chain & Facilities Management)	Female	20	61%
	Male	13	39%
Total		33	
Human Resources Department	Female	13	62%
	Male	8	38%
Total		21	
Commercial Department	Female	297	66%
	Male	154	34%
Total		451	
Fixed Telephony & New Business Department	Female	2	13%
	Male	14	87%
Total		16	
Financial Department	Female	55	60%
	Male	36	40%
Total		91	
IT Department	Female	26	21%
	Male	100	79%
Total		126	
Network & Supply Chain Department	Female	46	19%
	Male	191	81%
Total		237	
Grand Total		975	

(Data: 31/12/2014)

Our workforce is characterized by high academic level and specialization.

EMPLOYEES ACADEMIC LEVEL	
Department	Gender
Post-graduate degrees holders διδακτορικοί τίτλοι) (including doctorates)	26%
University degrees holders	44%
Technical diplomas holders	17%

(Data: 31/12/2014)

98.15% of our employees is employed under long-term contracts (of whom 1.44% work part-time). The remaining **0.41%** is employed under fixed term contracts (there is no part-time contract).

In 2014, we proceeded to **92** new hires, of whom 14 in the outlying regions (Thessaloniki, Ioannina, Patras and Crete).

The "open" jobs in our company are announced on our website **www.wind.gr**, as well as sites related to the labor market, and at the same time they are communicated through selected newspapers.

HUMAN RIGHTS & EQUAL OPPORTUNITIES

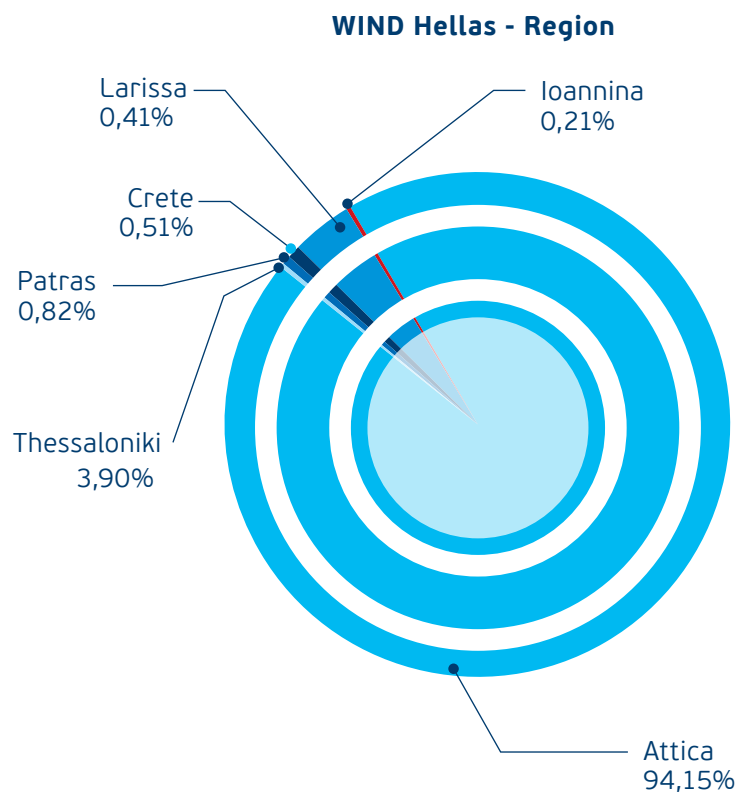
At WIND, we follow policies of transparency, meritocracy and objectivity for a fair and reliable working environment.

Our strategy and our philosophy are not restricted to numbers but are based on the principle of **non-discrimination, equal opportunity policies** and the recognition of every **individual's right** to work.

In this context, we offer equal opportunities to all our employees, without gender or other discrimination and from different areas around Greece.

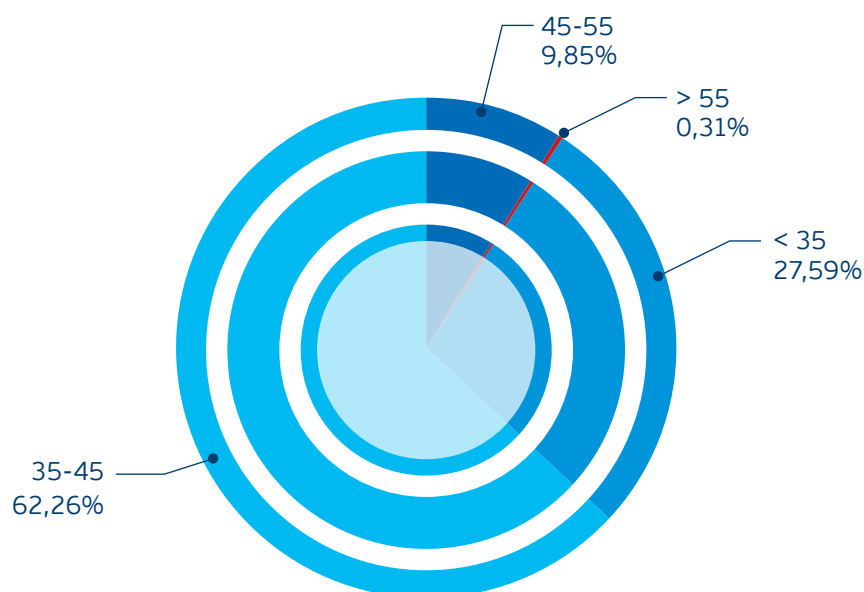
Applying the policy of equal opportunities for both genders, **47%** of our employees are female and **53%** are male.

Distribution Of Employees Per Region, Age Group And Sex

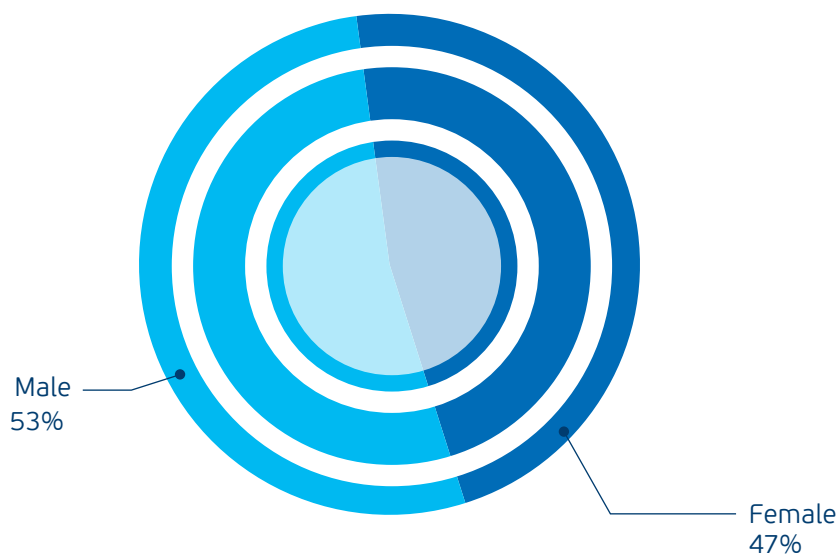


(Data: 31/12/2014)

WIND Hellas - Age Group



WIND Hellas - Employees' Gender



(Data: 31/12/2014)

Since the Company's establishment, no discrimination or unequal treatment incident has been reported.

With regard to human rights, we absolutely respect and we abide by all the international human rights provisions, such as the UN Global Compact, which our Company has signed, and are committed that no minors are hired and that there are no incidences of forced labor in our Company.

Furthermore, our Company has not received any complaints or accusations regarding a violation of human rights, neither from third parties nor from our employees during the period under review.

Freedom of Association

At WIND, we respect and protect the right of all employees to participate in unions and the existence of information mechanisms.

In July 2007, the first Company's Collective Agreement (ESSE) was announced being in effect from October 2006.

The latest renewal was in September of 2011.

Fringe Benefits

We manage to responsibly ensure excellent working conditions, benefits and advantages for our employees, providing a complete competitive benefits package that rewards performance, skills development and overall corporate success.

In the context of corporate integration of new employees, Human Resources Department conducts an individual detailed presentation of the benefits for each new colleague. Furthermore, when necessary, programmed presentations of the additional benefits are organized per geographical region.

Finally, to fully inform employees about the benefit package of the Company, relevant information leaflets and useful information cards are distributed with useful telephone numbers per service, and everyone is updated through a dedicated website.

WIND I WIN – WIND FOR YOU

We are trying to secure for all of us, our families and friends, more and more competitive prices, discounts and deals on our stores for product categories, twice the amount of data in our mobile, seasonal Bazaar with discounts up to 88% on devices and accessories, as well as in products and services of our partners or not in various categories throughout Greece.

WIND friends & family:

Preferential discounts on mobile, fixed telephony & combined programs for ourselves and our loved ones.

Furthermore, in 2014 we launched the new 1240 service for free, immediate and exclusive phone service for everything that concerns us, our family and friends about WIND products and services.

Collective Insurance Program

At WIND, we constantly re-evaluate the program in order to upgrade it and offer competitive terms of insurance and medical examinations prices.

In 2014, we ensured the allocation of the annual deductible amount per insured member for medical visits 60 € and other costs 60 €, an increased number of consultations on ABC network to 5 from 3 and extended the annual individual limit for radio-diagnostic and laboratory tests and drugs for serious diseases.

In addition, the collective insurance program was presented in order to be informed about developments in the public health sector, as well as about the proper and most efficient use of the program.

Fringe Benefits

- competitive remuneration packages – fixed and variable – which are based on comparisons with the market and reward employee contributions to the achievement of corporate goals
- life insurance with disability coverage - accident



- group medical coverage plan with the option or participation of employees' families
- subsidized private pension plans
- preferential use of mobile, fixed telephony and Internet
- restaurant – coffee shop (on Kifissias and Athinon Avenue Sites) with highly preferential prices
- discounts on company products at WIND stores
- benefits under the card reward program for transactions through WIND Bonus AMEX and WIND Bonus VISA
- discounts and special offers in shops and companies throughout Greece

HEALTH & SAFETY

Our priority and main objective is to ensure the health and safety of our people, through compliance with all security policies, as well as by correctly informing them on issues regarding health and directly concern every employee.

In 2014 we conducted evacuation drills in two basic premises of our company in Athinon Av. and Oreokastro. We note that before carrying out evacuation drills we trained the members of emergency teams on issues of:

- First Aid by specialized external partners
- Fire safety by officers from the Fire Department.

At the same time, we conducted measurements of temperature, humidity and lighting in our 4 premises (Kifissias Av., Athinon Av., Philadelphia and Neapoleos).

It is noteworthy that in 2014 we started the implementation of safety and health management system at Work according to OHSAS 18001 aiming to complete the certification process at the end of 2015.

In the context of upgrading the working environment, in 2014, we proceeded renovating 4.760 sqm in 2 buildings in Athens.

Finally we continuously monitor developments in the field of public health, and we have integrated in the corporate internal communication plan the provision of direct and timely update to all our employees in all matters that concern them.

Indices of injuries, professional sicknesses, loss of working days and absences

The following table summarizes the incidents during the last few years. We note that no serious incident involving fatalities has taken place.

	Losses in employees	Number of accidents (absence > 1 day)	Number of accidents (absence > 3 day)	Total days of absence from work
2012	0	1	1	25
2013	0	0	2	21
2014	0	1	3	185

*within company

Maternity Leave

In 2014, the number of employees entitled to maternity leave and used it was 46. All mums who used their maternity leave returned normally to work.

Health issues

Our concern is to promote in every chance the concept of preventive medicine for the employees and their families. In 2014, on the occasion of the Breast Cancer Prevention World Day we offered free Pap Tests & digital mammography to every female colleague and wives of colleagues.



EMPLOYEES GROWTH & DEVELOPMENT

WIND's human resources management philosophy is associated with the concepts of continuing training, encouraging, supporting initiatives and forming a quality working progressive environment that respects, supports and develops employees.

Personal Development Plan

The development in WIND focuses on essence and includes value added features for the people, the teams and the organization. The Personal Development Plan ensures that all our employees have the opportunity to advance according to their abilities and our Company's needs based on a com-

mon model of skills. This plan is carefully designed for each one of our employees in close cooperation with their supervisors and is based on the development experiences that are necessary for the achievement of the common goals.

Training

Our key priority is the continuous training of our employees so that they can grow while improving their performance through equal training opportunities and training in their working object.

Training is provided on technical and managerial skills, offering, in 2014, more than 18.542 hours of training.

We all participate in Development. We become Better!»:

Leadership Campus is a vertebrate and challenging educational program tailored to the characteristics and requirements of the wider group of our executives. It is based on the most modern experiential development methods through multi-thematic and interactive workshops, team coaching sessions and participation in informative workshops. For the second year in a row, 2,213 hours were implemented with the participation of 85 executives.

	Category	Hours of Training	Percentage	Average training/employee
2012	Upper level executives	380	7%	5,02
	Mid-level executives	326	6%	
	Technical Personnel	688	12%	
	Sales & Customer Service	4102	71%	
	Remaining Personnel	251	4%	
	TOTAL	5.747	100%	
2013	Upper level executives	752,8	4,6%	14,48
	Mid-level executives	4.231,6	25,6%	
	Technical Personnel	3.721	22,5%	
	Sales & Customer Service	5.782	35%	
	Remaining Personnel	2.014,6	12,2%	
	TOTAL	16.502	100%	
2014	Upper level executives	1327	7,16%	17,5
	Mid-level executives	1684,5	9,08%	
	Technical Personnel	3314	17,87%	
	Sales & Customer Service	9182	49,52%	
	Remaining Personnel	3034,5	16,37%	
	TOTAL	18.542	100%	

(Data: 31/12/2014)



WIND STORES

Since 2012 we have managed to offer free Private Social Tourism Cards, while we prepared a new Collective Life & Health Insurance program for all salesmen in WIND Stores, with unique privileges and broad healthcare.

«I Develop-Mentoring Youth»

The company participated for the second year in the exploitation of the CSR actions for the development of its executives, encouraging them to voluntarily participate in young people mentoring programs that give our people the opportunity to develop their leadership skills and to have a different development experience.

In this context, our executives participated in the following programs:

■ “Future Leaders”

We consistently continue our cooperation with the organization Future Leaders, which aims to strengthen non-profit organizations through the contribution of experienced business executives in the development of their business plans and practices.

In 2014, two colleagues participated as Business Coaches and guided two groups of talented young people and worked together and developed their business plans for the «Sxedia» and «Archeion» NGOs.

■ Job Pairs

We were the first company that supported Job Pairs, a voluntary initiative that connects executives and professionals with graduates who are seeking to start their career in the same industry / profession. With a large group of volunteers of 10 executives of our company, we contributed to the cycle of 2014 and will continue.

Internal Training Programs

We, the people of WIND, took the initiative organized various internal trainings diffusing knowledge to our colleagues. The trainings included, among other, SAP, ISO 1400, Business Continuity Management System, Disaster Recovery plans Implementation, Code of Conduct. That way, this year, 622 hours of training were implemented.

Scholarships

A program to finance bachelor's and masters studies aiming at earning a valid degree. Since 2002, the Human Resources Department has granted a total of 43 scholarships for Undergraduate and Postgraduate Studies in public and private academic institutions, of which 31 were for postgraduate degrees and 12 for undergraduate degrees.

TALENT MANAGEMENT & SUCCESSION PLANNING

The in time forecast of future needs of the Company with the emergence of talented executives, and the development of talented executives, are of high importance for all of us.

Internal Candidate Recruitment

When there is a need to fill an open post, we firstly look among our own people, as the best source of qualified candidates. Thus, our employees are encouraged to explore opportunities for a change and growth in other posts or departments. Our goal is to give them the chance to acquire knowledge, personal growth and freedom of choice. Within this year, 6% of our people took a significant step forward and were promoted, by changing responsibilities or moving to completely different operations.

Human Resource Development Procedure “Grow@WIND”

All of us at WIND we are proud that the value of high performance and continuous improvement is the primary component of our culture.

In February 2013, we created the new Human Resources Development Procedure, «Grow@WIND», which is a tool that focuses on development and participation. High performance, persistence and consistency, positive attitude, cooperation,

inspiration, active learning and self-improvement, a focus on customer service, perception of «big picture», initiative are some of the properties that we all chose to concentrate on. The design was done with the support and participation of all of us, the management team of Human Resources and various working groups of colleagues from different groups.

The central axis of this new procedure is the alignment of our people with the corporate strategy, our objectives and values through specific skills that we seek to develop. Upon completion of the planning, we organized educational meetings with our people in roles with teams management and update presentations to all our people.

The aim of the development process is:

- To help us think about our growth and structure our development plans, taking the responsibility for our personal progress.



■ To give us the opportunity to get more value from our development to:

- Improve our performance
- Pursue our business expectations

The structural features of the system are the professional qualities and behaviors that make WIND people stand out, as well as the performance criteria for each administrative level.

For the development of the WIND employees growth program we held a **focused survey** for the **improvement** of the process via online questionnaire and working groups, on a random but representative sample of **15%** of our colleagues, the results of which were included in this year's process.

INTERNAL COMMUNICATION

At WIND Hellas, our working environment is characterized by mutual respect and trust. Sincerity and responsibility for our customers and colleagues is an integral part of the employees' professional conduct, whilst we operate with transparency and reliability in all our daily transactions inside and outside the Company.

We believe that deepening internal communication at all levels is one of the fundamental factors that determine our success and which strengthens the climate of trust and contributes to the establishment of a single culture that acknowledges individual capability, effort and contribution, while further enhancing team work.

Bidirectional Communication

At WIND, we utilize all the modern means of internal communication, keeping employees informed about issues that directly concern them. The methods and channels of communication for open and constructive internal dialogue that we use, such as surveys,

workshops, meetings with members of the management team, on-line meetings, HR Friday meetings, WIND News, internal intranet etc., a list that grows over time.



CORPORATE INDUCTION PROGRAMS

Corporate Induction Programs

In early 2014 we implemented Welcome OnBoard, the new integration process for new colleagues of every division and department in our company. Our goal is the simple, interactive and effective familiarization of our new colleagues to the activities and working methods in WIND.



**We communicate.
We become better.**

Employees Opinion Survey

Participation increases every year and in 2014 it reached 80% of all our colleagues. The high participation rate in the survey gives a reliable picture of the organization, its evolution and the issues that concern us.

Based on the results, annual action and improvement plans are designed at groups and company level. Our aim is to continue to evolve and make WIND a top workplace.



Living our WIND Values

Our culture is the way in which people interact, fulfil their duties, the feeling of «us». Its cornerstone are our values that determine what we consider to be important to the behavior of individuals and the whole organization.

At WIND, we have our own five Values, that were determined in order to serve our Commitment: Integrity, Simplicity, Flexibility, Entrepreneurship, Teamwork.

In order to strengthen and enrich their meaning, we designed the «Living our WIND values» workshops for all employees.

Through those workshops we aim to share how we experience our values and how they will lead us in the future that we seek.

A total of 50 workshops were implemented in Athens and Thessaloniki, reaching a participation rate of 84% of our colleagues.

During this year, WIND has welcomed us and our families to enjoy pleasant moments in Parents' Day, the Christmas celebrations in Athens and Thessaloniki, the Environment Day, «F2G CINEMA | Premieres for all», free invitations to TEDxAcademy other events.

EMPLOYEES EVENTS

Parent's Day

A different day! For the 11th year, the Parent's Day event took place at 11/9 and was combined with the first day of the academic year. At the end of the event symbolic gifts were offered from the «Smile of the Child» which participated once again in the support of children and their rights.



Christmas Party

The corporate Christmas event was successfully organized and there was a high percentage of participation! In addition, a children Christmas party was held in our facilities in Thessaloniki with lots of music, playing and dancing.



VOLUNTEERISM AND SOCIAL OFFERING

Environment Day

On Environment Day, on 5 June, we participated actively and responsibly in a «green» initiative by organizing the Recycling Electrical and Electronic Equipment and Bulb Week during which we managed to collect 219 items.

Information Campaign «Kids@Safety - Internet, Mobile & Child»

For yet another year, we supported the work of our corporate campaign in the context of the 11th celebration of the «Safer Internet Day» with the slogan «your mind before you click». Recognizing the importance of proper information and scientific advice to parents, two specialized seminars were organized with Dr. Veronica Samara as speaker exclusively for us.

Internal Volunteerism

Social policy starts from our people, who are involved in a large number of different actions aimed both at vulnerable social groups who need support, as well as the environment.

WIND Running Team

This year, the presence of our team in major events such as the marathon in Athens and Thessaloniki, as well as other sports charity, was quite important and noticeable. We should mention the new original online action WIND smile & support where we managed to collect approximately 23.000 selfie photos strengthening the work of organizations and institutions that take care sensitive social groups.

Social contribution

We participated in several social responsibility actions, such as love gifts, donations, support of actions for the family and the environment, participation in the national unemployment assistance program, partnerships with organizations that support labor market for young people, cooperation with the Department of Economics of Piraeus University.

Employee Blood Bank



One of our most important initiatives, which operates since 2012 thanks to our employee voluntary blood donation program, which now takes place twice per year. Since 2002, the Blood Bank lists a total of **889** volunteer participants.

In 2014, the Blood Bank covered the needs of 35 of our people (colleagues and their relatives) with 50 blood units.





FOCUS ON THE CUSTOMER

For second consecutive year the program was implemented with the participation of 190 colleagues from the commercial department and several teams of the IT and credit control and accounting department.

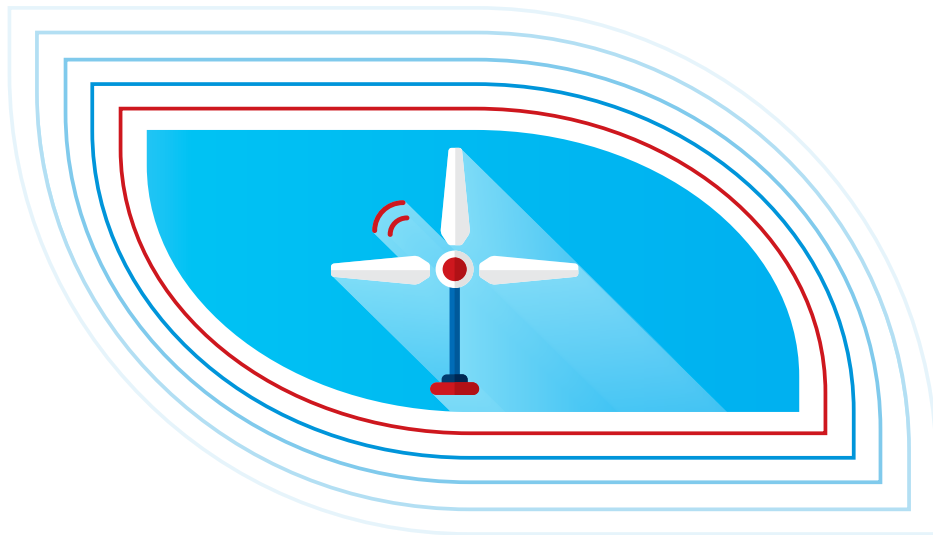
We aim to encourage everyone to bring their ideas on how we can improve the experience of our customer.

The program will continue in 2015 with the participation of other groups of employees.

**WE LISTEN
TO THE CUSTOMER**

88 MARKET

Customer
Focus



THE ECONOMIC CRISIS EXPERIENCED BY OUR COUNTRY IN RECENT YEARS HAS LED TO A SHIFT OF OUR CUSTOMERS' PRIORITIES. THEREFORE IN 2014 WE TOOK MAJOR RESTRUCTURING OF OUR COMMERCIAL PLANS, WHICH HELPED US TO EFFECTIVELY MANAGE THE CONSEQUENCES OF THE CRISIS.

OUR CUSTOMERS INCREASINGLY
REQUIRE AND REQUEST PRODUCTS
AND SERVICES THAT ARE
GUARANTEED AND HAVE BEEN
MANUFACTURED TO SPECIFIC
STANDARDS.

From our side, in 2014 we moved to the re-design of products and services, the re-design of our store chain, the modernization of our telecommunications network, to ensure a quality service level by all possible means and finally to the creation of trust relationships with our suppliers.

Thus in 2014, in a highly demanding year:

- We maintained our base, while having an increase of 9% in fixed telephony.
- We carried expansion in 10 telecommunication nodes, reaching a total of 286.
- We extend the coverage of VDSL from 162 to 180 cities and we more than doubled the relative basis.
- We focused on our online presence, in terms of offers, messages, appearance and functionality of the site and the online shop.
- We achieved a significant improvement in customer service in our call centers with over 80% of calls to be answered in less than 20 " and very small percentages of calls not serviced.
- We offered improved customer experience in our stores with an enhanced ability of explaining accounts and offers.
- We ensured customer satisfaction rates that were increased by 30% and improved the response times to customer requests that require management by the Back office.
- We optimized our customers' online experience through the new responsive site of WIND, the redesign of mywind, and the new service «email-bill».

MARKET
Customer
Focus



2014

OUR TELECOM NETWORK

Since the establishment of WIND Hellas, we invest intensively in infrastructure and development of our network with responsibility and sensitivity to public health and the environment.

During installation, operation and control of the operation of our network, we adhere to all the international security standards as well as the directives of Greek Legislation.

More specifically:

- we adhere to the most stringent exposure limits set by the law as well as from competent international organizations.

- we collaborate with the local bodies, when constructing new base stations.

The aim of our strategy, with our investments to the new network and our trade promotions, is to bring mobile broadband closer to Greek users and we accomplished until the end of 2014, the **population coverage of the mobile network to reach 100%.**

Since three years ago, we started

the project for the complete modernization of our network, one of the largest infrastructure projects in the country. It is about creating an entirely new radio network enabling mobile broadband nominal speeds up to 42 Mbps (download).

In 2014, the modernization of stations covering areas such as Athens, Thessaloniki, the wider area of Corinth, Viotia and Evia areas, areas of Cyclades, the Dodecanese, N. Aegean and Evros, Thesprotia and Corfu and areas of Magnesia and Larissa were completed, while we continue in other large cities as well as in targeted areas.

VICTUS NETWORKS

Following the strategic agreement between Vodafone Greece and WIND Hellas for the partial sharing of mobile network 2G / 3G, especially in the region and limited to a few urban areas, the formation of the new advanced technology company, under the name «VICTUS Networks A.E.» was completed.

Victus Networks, bringing together the two companies, Vodafone Greece and WIND Hellas, with 50% each, started operating in 2014 and manages all functions of the access network (base stations) providing the corresponding services for the two companies.

FIXED TELECOM NETWORK

Coverage for **fixed telephony** services and broadband Internet is at about 70% of the installed telephone lines in Greece. During 2014, 10 telecommunications nodes were expanded and the connection circuits at about 70 sites were upgraded through backhauling.

DEVELOPMENT OF FIXED TELECOM NETWORKS	
International Capacity	80 Gbps
GR-IX	20 Gbps
Collocations in Telecommunication Hubs	286
Underwater Fiber Optic Cables	Between Greece - Italy
Underwater Fiber Optic Cables between	Between Crete - Peloponnese Peloponnese – Central Greece

ELECTROMAGNETIC RADIATION

At WIND we adopt policies regarding the monitoring and measurement of electromagnetic radiation levels, while we have installed mechanisms of error prevention and improvement of the provided testing and measurement services.

We adhere consistently to all our obligations on legal and regulatory issues of telecom services, and we safeguard the impartiality of the measurements.

In addition, we systematically inform our subscribers through specialized brochures, through www.wind.gr or through articles and media interviews.

Finally, we make sure that all our mobile telephony devices strictly adhere to the requirements for safe radiation exposure (as defined by the International Commission on Non-Ionizing Radiation Protection and the Federal Communications Commission) and actual SAR levels are much lower than the permissible limits.

ECONOMY FOR ALL

At WIND, we offer mobile telephony, fixed telephony and Internet services, combined packages of fixed line, mobile telephony and internet and prepaid telephony.

For **2014 we continued our strategy by further simplifying** our programs and services, offering fewer, more simple and understandable, affordable and «honest» products accessible to subscribers.





NEW DIGITAL STORES

The redesign of WIND store chain is one of the largest investments in the Greek retail market. It is the company's strategic investment totaling EUR 20 million €. For its implementation, it took about 1 year of cooperation with Allen International, the No 1 retail stores design office in the world. In the new WIND store the consumer is put at the center and feels as comfortable «as at his home.» The environment is completely digital. Through touch screens, the interested parties can be informed on the most popular devices and find the most appropriate solutions. The widest range of smartphone is available while everything is live.



MOBILE TELEPHONY

In addition to the existing product portfolio, in 2014 we launched **two** more commercial proposals.



Hybrid Programs - Prepaid

In 2014 we responded to the social and economic conditions prevailing in the market, by providing our customers products and services that are characterized by the best value / price ratio. In our effort to meet the needs of our customer base, we allocated hybrid programs – Prepaid connections, which combine the benefits of the contract and prepaid and enable consumers to have total control of their communication. These programs are targeted at Prepaid WIND customers.

Furthermore, for all WIND Prepaid Contract customers, we offer financial solutions to meet any additional needs beyond their integrated use. With a surcharge of 5 € that appears on their next bill, they can select one the following: 200' to all national networks 600' to WIND & Q, 100 SMS or 1GB mobile internet.

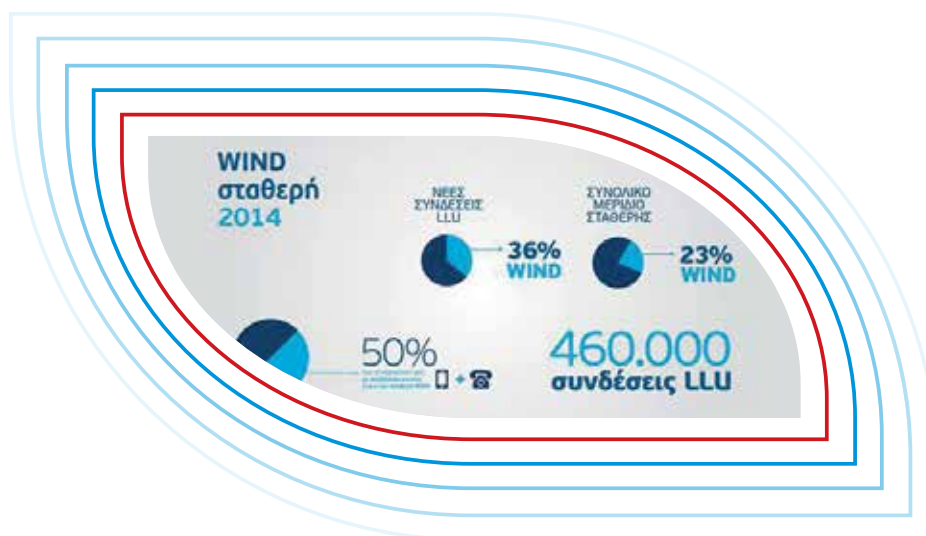
New Add-on Services for Contracts

For subscribers who want more economic communication abroad, we provided a new service, which offers up to 200 minutes to the most popular international destinations. With this service, the consumer can choose international destinations which he calls more often and talk to his people more economically..

FIXED TELEPHONY

In 2014, we continued our strategy in fixed telephony, by focusing in the simplified product portfolio **which** became commercially available at the end of last year.

The available products were limited in 3 fixed telephony products and two combined (fixed and mobile), while strengthening the customers choice with regard to the part of equipment and proceeded gradually to actions for the development and improvement of VDSL.



RESPONSIBLE SERVICES

MOBILE TELEPHONY

Contracts Balance Update Service

Every mobile telephony contract subscriber can be informed about his or her airtime or SMS, at any time instantly and free, by sending a blank SMS to 1212.

WIND to All programs Balance Update Service

WIND to ALL subscribers can be informed about their airtime, SMS & MBs of their program or their additional bundle, as well for the Account Limit they have initially defined, simply by making a call to 1270 from their mobile.

WIND to All Programs Free Automatic Update Service

In addition, at WIND to ALL programs, subscribers always know what happens to their account. Because they are updated automatically and free of charge with SMS, 10 minutes, 10 SMS & 10 MB before, as well after the free usage of their program is exhausted.

Minors protection

As far as multimedia information services are concerned we adhere strictly to regulations for the protection of minors when using the mobile phone. Regarding the 901 and 909 lines that we have, as well as the five-digits SMS, the owner of the account (adult) can request with a phone call or written communication to be blocked.

Customer Service

Table1

Call Number	Mobile Service (Individuals)
1270	Balance Update Service for W and WIND to ALL programs
1268	Balance Update Service for Prepaid Telephony
1342	Prepaid Bundle Change Service
1215	Account Information Service
1260	Customer Service Department
1231	New Technologies Service Department (Internet, Mobile Broadband, Smartphones)
11818	Greece Phonebook Service

Call Number	Fixed Telephony Service (Individuals)
13800	Fixed Telephony and Internet Customer Service
1212	Technical Support and Fixed Telephony & Internet break-down from within WIND network (free of charge)
211 120 1212	Technical Support and Fixed Telephony & Internet break-down from another network (with charge)

Call Number	Mobile and Fixed Telephony Services (Professionals)
1277	from WIND mobile phone free of charge
800 500 1277	from fixed line free of charge
6935601277	from another network or overseas with charge

More information at www.wind.gr

PREPAID TELEPHONY

Balance Update Service 1269

Every prepaid telephony subscriber can be informed instantly, automatically and free of charge. Consumers can be informed about their airtime balance, their balance after having consumed the free airtime package/es of their program, as well as their loyalty bonus.

Airtime Extension Service 1268 - With the WIND SOS Recharge service you can extend airtime directly, simply by calling 1268.

Subscribers have the possibility, even if they have a zero balance, to extend their airtime balance, simply by calling a 4-digit number in order to speak instantly at a difficult time.



WIND Ring Me Now Service

This service allows subscribers to send an immediate alert to any WIND customer, either prepaid or contract, requesting a call-back when their balance is not sufficient. Sending an SMS to 54040, writing only the number of the mobile phone that is going to make the call activates this service.

Prepaid Bundle Change Service

This service enables subscribers to select the prepaid tariff plan according to which they will be charged. Calling 1342 can perform the tariff plan change and the change is activated immediately. Requests for plan changes may be made once per month.

WIND Double Play

από 40€ μόνο με 20€/μήνα!

- Απεριόριστο Internet
- Απεριόριστες εθνικές κλήσεις
- Δωρεάν 300' /μήνα προς κινητά

Απόκτησέ το

ΣΧΟΛΙΚΑ-ΕΙΔΗ
ΕΝΟΙΚΙΟ
ΦΡΟΝΤΙΣΤΗΡΙΑ
ΤΙΤΛΟ ΣΤΑΘΕΡΗΣ + INTERNET
40€ → 20€

WIND
doubleplay



LG Optimus L1 II

Το ολοκαίνουργιο smartphone της σειράς L-Style της LG, το



Alcatel One Touch T'Pop C3

2πύργημα επιδεξιγραφική και οθόνη 4.0", κόντρα στην περιήγηση στο διαδίκτυο εξαιρετικά γρήγορη. Ακόμη, δέχεται 2 κάρτες sim, δίνοντας τη δυνατότητα να συνδυάζει προσωπική και επαγγελματική ζωή.

Δωρεάν
με πάγιο από 40,00€

Επιλογή

Δωρεάν Smartphone

WIND Mobile Broadband

INFORMING THE PUBLIC

Parental Control

We systematically inform parents about the ability to restrict access to minor users, through print and electronic media, as well as by organizing or supporting workshops implemented by the Cyber Crime Force throughout Greece. In order to strengthen parental control, we provide our internet users, through configuration of equipment, the ability to restrict access, such as prohibiting specific sites or groups of URL, allowing access only to specific devices or allowing specific applications through the restriction of specific protocols. More information is available in www.kidsatsafety.gr

Transparent Billing

We make sure that at every point of customer date, billing information are provided in a transparent, detailed and clear manner, and that it is explained simply and accurately through updated price lists, press releases or through personal communication. Regarding multimedia information services and calls charged at higher rates, we provide detailed information to our subscribers concerning these charges, fully implementing the regulations of the Hellenic Telecommunications and Post Commission (EETT), clearly announcing the charge for the call with a free pre-recorded message.

The charges for all multimedia information services for each product can be found on the Company's website (www.wind.gr)

RESPONSIBLE PRODUCTS

For the products we order and offer for sale through our network of associates, we make sure that it is mentioned on the order that they should be covered by European legislation (http://ec.europa.eu/enterprise/policies/single-market-goods/cemarking/fac/index_en.htm), as harmonized with Greek law.

Our systematic research in the market for new technologies, which contribute to making equipment more environmentally friendly (in terms of the materials and energy consumption) has already resulted in the upgrading of the equipment provided to consumers for accessing the Internet, thus allowing us to achieve more efficient operation of the local consumer networks.

As part of our effort to protect the Environment, we promote our services without equipment. Most Internet users in Greece already have the relevant hardware (modem/router). Thus, we stopped sending equipment massively with every new connection, so that the environment is not burdened with machines that the user does not need and require special handling for recycling.

«GREEN» PRODUCT

WIND BUSINESS CLOUD

In July 2014, we launched the WIND Business Marketplace, a modern online environment with all necessary business applications gathered in one point at the Cloud.

Cloud services management can be made from everywhere, directly and online with a Click on the screen of a Laptop, Tablet or Mobile Phone.

Smart Search tools enable users to easily and quickly find what they need, so that through the WIND Business Cloud services professionals can significantly increase business productivity, drastically reduce operating costs and promote a modern enterprise to the internet.

WIND Business Cloud services allow online access from any device, anywhere, anytime, to corporate email and contacts, fleet check in real time, direct communication with customers and partners.

WIND FLEET

We have developed the innovative WIND FLEET service, providing the opportunity to companies, professionals and public agencies who manage fleets of vehicles and means of transport to reduce their operating costs, to allocate resources better and to increase their productivity by optimizing their operations and procedures.

Thus, by reducing the cost and overall fuel consumption, a significant reduction in a Company's carbon footprint is achieved.

WIND FREEZE ALERT

WIND Freeze Alert is the revolutionary management solution for refrigerators monitoring and aims at professionals and stores of health interest for which the condition of the goods is crucial.

It is a complete solution and offers significant benefits to the professionals, such as checking the refrigerators operation in real time and ensuring the quality of the goods even in a power failure, making it necessary for quality control management systems and obtaining HACCP certificates.

RESPONSIBLE MARKETING

The programs we provide are in accordance with the regulations and optional codes concerning communication and marketing, aiming for the fullest possible information of the consumer about the benefits of our products and services.

We ensure that our communications and promotional material is legitimate with the Greek Code of Advertising - Communications (GCA-E), the provisions on unfair competition and consumers' protection and the overall existing Greek legislation. We follow and adhere strictly to the regulations/guidelines of the Communications Control Council (S.E.E.).

COMMUNICATION PRINCIPLES

Communication strategy is of major importance to all of us at WIND. We focus on the need for exceptional and effective communication that differentiates WIND from the rest of the market, and reinforces its image. In this context, having as main objective the fulfilment of our commitment towards the customer and to offer the best possible service, we define 3 basic communication principles, that govern the way we operate:

Responsibility

The communication that is simple and understandable to all is of great importance to us,

that is why we support distinct communication of products & services through every channel of promotion.

More specifically, our websites (wind.gr, f2g.gr, myq.gr) are key channels of communication with consumers since every information is presented in full detail, making clear every separate element. Furthermore, through our e-shop, wind.gr, visitors can choose the program or device that suits their own needs and complete the purchase easily and quickly. In a further effort for the public to take proper, understandable and clear information, special attention is given to surveys of qualitative and quantitative nature. Surveys are an integral part of the procedures we follow, aiming to improve our communication to the general public.

Directness

In 2014, we continued to invest in a 360-degrees communication strategy, maintaining multiple channels of marketing and distribution of our products, selecting direct and



clear ways of promotion.

Being customer-focused, we continue to support the part of online communication, investing more in the part of “e-care” and further developing the access ability from desktop, tablets or smartphones.

In addition, we now offer the possibility of direct service, on-the-go access and purchase of products and services through the MyF2G and MyQ apps. Furthermore, subscribers can manage their connections through myWIND service. As a result, our communication with consumers becomes, year after year, more direct and easily accessible from everywhere.

It is characteristic that, in 2014, WIND was awarded, among others, at the “3rd Conference Social Media World & e-business World» with the e-business Excellence Award - Best Practice for excellent online presence and promotion of the prepaid WIND F2G, and the institution «Social Media Awards» organized by Marketing Week of Boussias Communications with Social Media Strategy 2014 - Best Use of Social Media / Telecommunication award for the strategy we implemented in Social Media rewarding the effort to upgrade the online experience of our subscribers. As a result, our communication with the consumer becomes, year after year, more direct and more easily accessible from everywhere.

Honesty

At WIND, we make substantial efforts so that our communication is consistent with the principles of fair competition, respecting the Code of commercial and social communication.

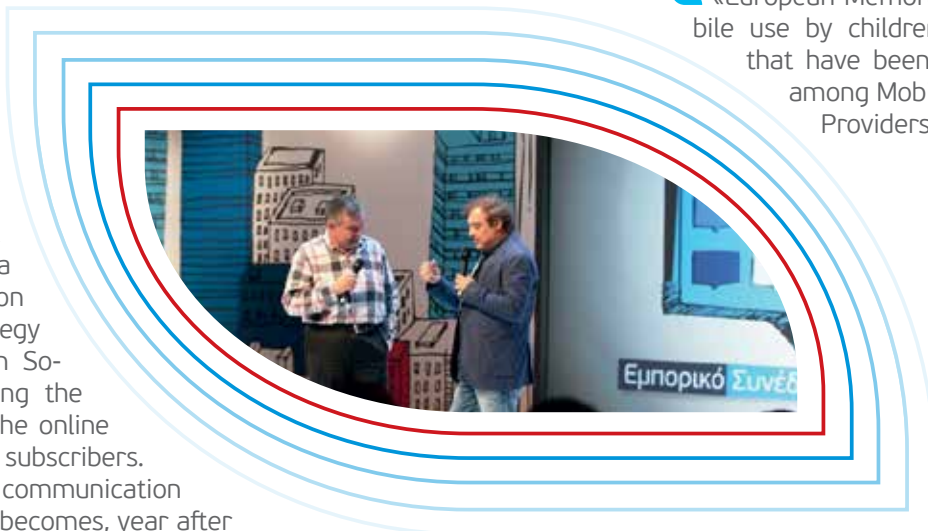
Our aim is to build trusting relationships with existing and potential customers. That is why we invest in ads that gain public acceptance, explicitly communicating every product information, and are not against the Code of Advertisement. It is worth noting that WIND, for 2014, had the least control requests, compared to its competitors in the Telecommunications category referred to the Communication Control Council.

Furthermore, we fully apply the provisions about unfair competition. In this context, we have not received any appeal for violation of fair competition during the period of the Report.

CODE OF CONDUCT

Our Company strictly adheres and binds third contractual parties to adhere to the codes that has been issued by the Hellenic Telecommunications & Post Commission (EETT) and are related to consumer protection matters, namely:

- Code of Conduct for Provisioning Electronic Communications Services to Consumers (Dec. 488/82/30-7-2008 EETT), as in force.
- Code of Conduct for Providing Multimedia Information Services (Dec. 451/10/1-10-2007 EETT), as in force.
- In addition, the Company fully applies and bind third contractual parties on the application of the codes related to child protection issues, namely:
 - «Code of Conduct for value added services offered through mobile phones and the protection of underaged users »
 - «European Memorandum on safer mobile use by children and adolescents», that have been signed and applied among Mobile Telephony Service Providers.



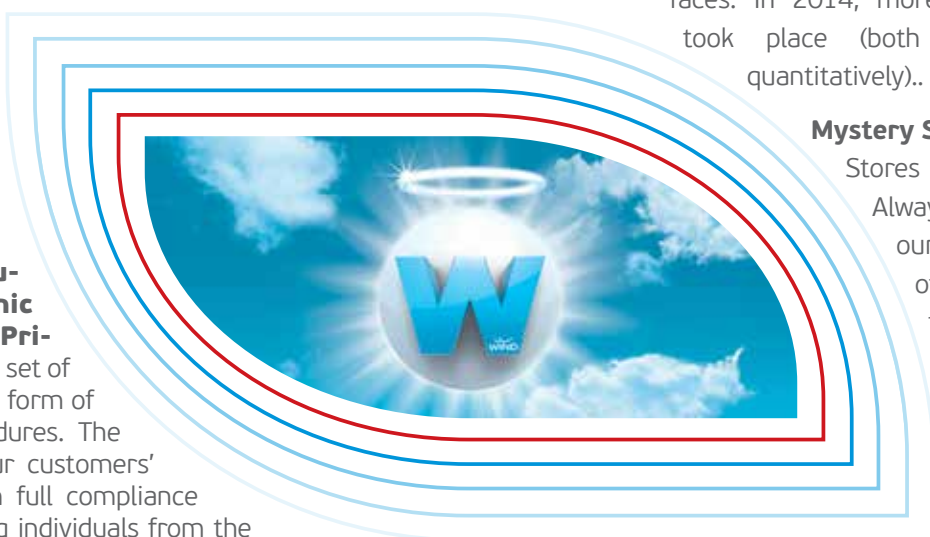
INTELLECTUAL PROPERTY RIGHTS & COMMUNICATION PRIVACY

In every contact we sign with consumers we include strict conditions in relation to the **protection of intellectual property**, prohibiting our subscribers to use our services in a manner that violates copyright laws under penalty of contract termination. Furthermore, we fully comply with our legal obligations as networks and electronic communication services providers in relation to intellectual property protection.

Furthermore, we have signed a Cooperation Framework with the local Collective Copyright Management Organizations aiming to act together in order to inform and raise awareness of the general public regarding Internet piracy and the subsequent damage that the owners of copyrights suffer, which are internationally recognized as human rights.

Regarding the **security of Electronic Communication Privacy**, we have a full set of security rules in the form of policies and procedures. The management of our customers' personal data is in full compliance with laws protecting individuals from the processing of personal data.

In 2014 there had been no violation in the management of our customers' personal data that has come to our attention.



MEASUREMENTS & EVALUATION

WIND survey program, in 2014, consisted of tracker surveys conducted in continuous waves as well as ad hoc surveys that explore specific issues when they arise. Both research approaches have a common goal: understanding consumer's telecommunication needs, so that we offer the best services.

Tracker Surveys

In particular, independent research agencies of ESOMAR completed 12 wave surveys that aimed to monitor specific «health» indices for our Company.

Ad Hoc Surveys

Ad hoc surveys provided us with valuable insights on topical issues the organization faces. In 2014, more than 20 projects took place (both qualitatively and quantitatively)..

Mystery Shopping

Stores

Always trying to improve our stores, in order to offer the best service to our customers, we designed the Mystery Shopping program. The «secret» visitor, during his visit to the store, evaluates it

based on specific parameters. Specifically the main pillars assessed are:

- Store appearance
- Personnel appearance / staffing
- Service
- Assessment based on the scenario under investigation (needs, proposal presentation)
- Visit ending

Mystery Shopping is a valuable tool that gives us the opportunity to constantly monitor our key pillars of service in our stores so that we take corrective actions. Our primary objectives with the research mystery-shopping program are: to be continually improved so customers in our shops enjoy the best service.

Customer Satisfaction Survey

The customer satisfaction survey is embedded in the largest research program of the company (which is in the form of tracker) and conducted in 4 waves per year.

More specifically this research records and monitors the evaluation of customers experience as well as the competition in key dimensions. Investigative areas include:

- the overall experience with the provider
- the experience with coverage/network
- the experience with programs and packages
- the experience with shops
- the experience with the call center.

The objectives of this survey project is to monitor the above key indicators and contrast them with the performance of the competition. With this methodology, it is possible to understand our performance and the possible distances from the competition.



The findings of this survey give us the opportunity to design interventions / corrections so that customers are always satisfied with our services and products.

Re-positioning Survey

In late 2014, a research program was designed and implemented, with the main objective to investigate areas that:

- Can help the brand to go to the «next level»
- Differentiate from the competition.

To achieve the above, we designed a qualitative research in the form of focus groups in fixed and mobile telephony users of all networks.

CUSTOMER SERVICE DEPARTMENT

Customer experience satisfaction survey

Within the Customer experience improving program, which constitutes our strategic priority, we planned and implemented a series of actions and initiatives aiming to create a great customer experience.

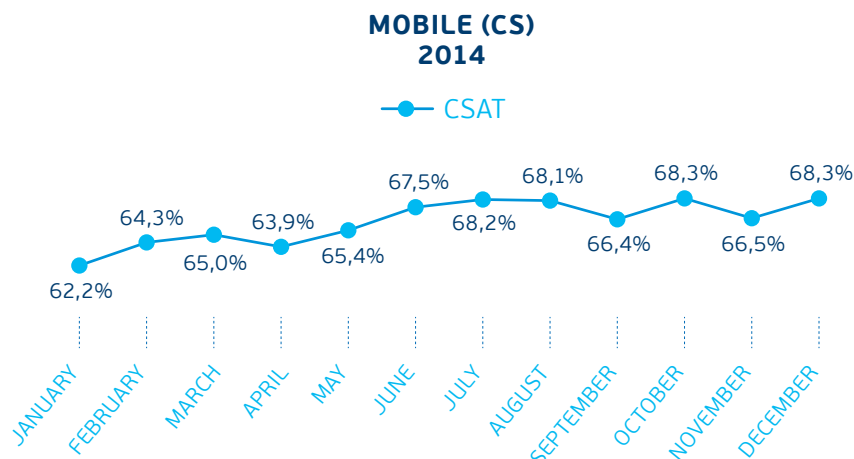
The areas of improvement concern the whole lifecycle of the Customer from our products and Services to our Customer service in the call center or in our stores, and include actions of education and development of our people as well as the redesign of our products and processes.

Customer Satisfaction Survey CSAT

The Customer Satisfaction Survey - CSAT, which began in 2012, was continued and renewed in 2014. The survey is conducted by subscribers of Mobile and Fixed Telephony who contacted the Customer Service Department and includes 5 recorded closed questions to which the subscriber is asked to respond.

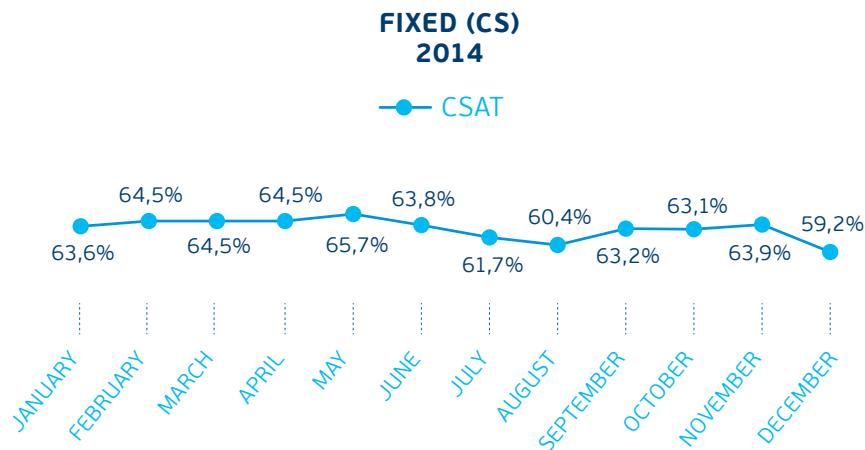
More specifically, for 2014, the sum of answered questionnaire, from subscribers who contacted Mobile Service Department, is approximately 80,000. The diagram below shows for each month of 2014 the average percentage of subscribers who have indicated that the telephone service they received was excellent and Very Good (CSAT) to the following question:

«How would you describe your overall experience from your Call Service?»



Similarly, all the sum of answered questionnaire from subscribers who contacted the Fixed Telephony Call Center (13800) is approximately 75,000. The diagram below shows for each month of 2014 the average percentage of subscribers who have indicated that the telephone service received was excellent and Very Good (CSAT) to the following question:

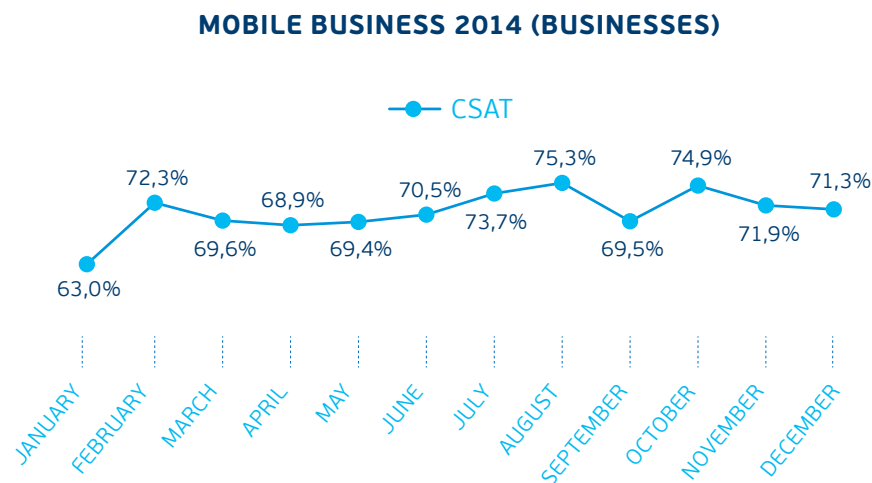
«How would you describe your overall experience from your Call Service? »



In addition, the sum of answered questionnaires from subscribers who contacted the Corporate Mobile Telephony Subscriber Call Center is approximately 8,000.

The diagram below shows for each month of 2014 the average percentage of subscribers who have indicated that the telephone service received was excellent and Very Good (CSAT) to the following question:

«How would you describe your overall experience from your Call Service? »



ΠΕΡΙΕΧΟΜΕΝΑ	ΣΕΛ.
W BUSINESS	2
WIND BUSINESS DAY	3
WIND RUNNING TEAM	4
Q SOUVLAKI EVENT	5
GOOD NEWS	6

ΕΜΠΟΡΙΚΟ ΣΥΝΕΔΡΙΟ WIND

«Όλοι μαζί
& «Όλοι
νόμους



■ Taking under consideration the results of 2014 as well as those of 2013, for the Mobile Telephony Service Department and the Corporate Mobile Telephony Subscriber Service Department, it is worth noting that there is a significant and steady increase in satisfaction of the subscribers.

■ In respect of the Fixed Telephony Service Department, taking into account the results for 2014, as shown in the diagram, and the corresponding results of 2013, a stability in satisfaction of subscribers is observed.

Based on the results, the necessary actions are designed and objectives are set again focusing on achieving maximum customer satisfaction.

NEW KNOWLEDGE BASE PLATFORM

Seeking continuous improvement of handling everyday tasks of the Customer Service Department, in June 2014, a new, flexibly designed, platform Knowledge Base was created, through a systematic effort to reorganize the information management mechanism.

The main objective of the creation of the KBase is to simplify the daily needs of the Customer Service Department, significantly reducing the time of finding information.

The operation and maintenance of the KBase is based on the development of an information collection system which is powered by all involved departments of the company.

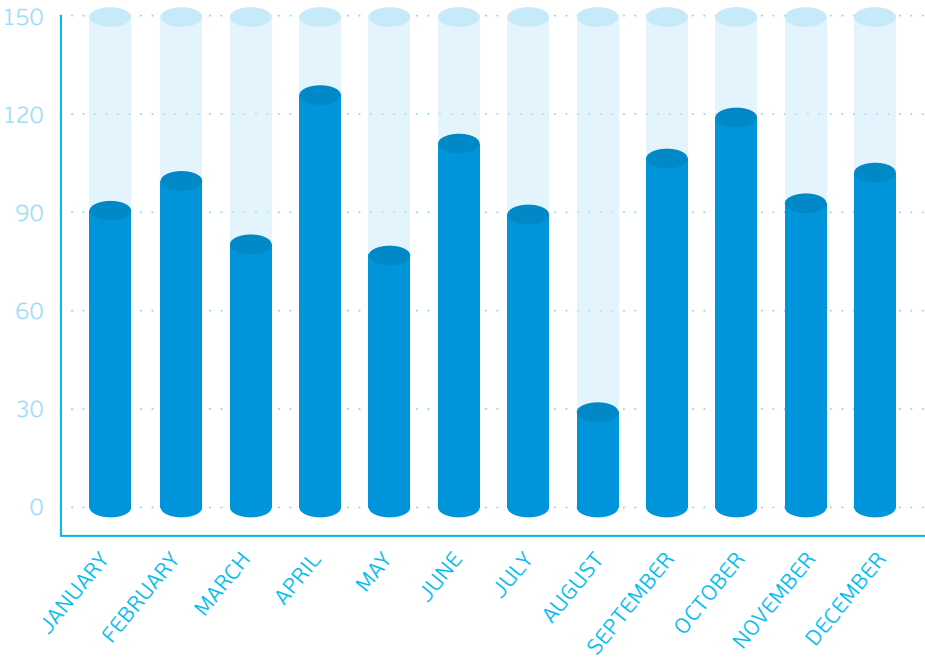
The logic of the KBase is based on staggered levels of organization of information, facilitating direct access.

It is worth noting that the content of the KBase is updated daily with new information about products, services and processes of the company, while taking into account the valuable feedback of the colleagues from the Customer Care Department.

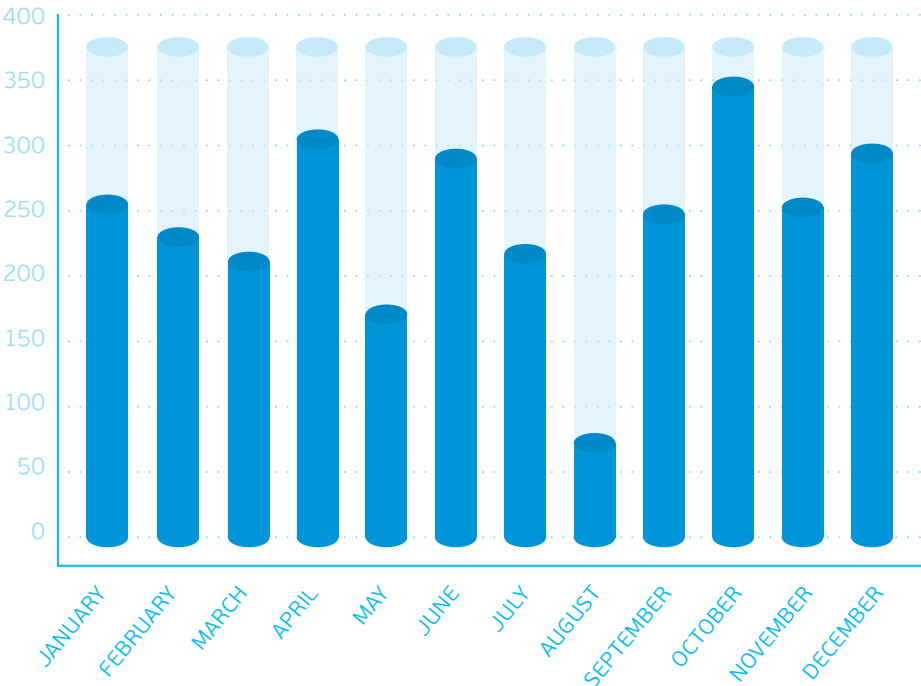
Here are the statistics on the usage of the Kbase for 2014:

Average navigational movements per day	~6000
Average searches per day	~1250
Number of unique users per day	~300
Number of unique users over 30 days	~500

Number of updates that were posted at the Customer Service Department for the year 2014.



Number of updates that were carried out posted at the Customer Service Department for the year 2014.



Processes Simplification through increased online procedures in the Customer Service Department

The Customer Service Department receives daily on line processing requests declared by subscribers by phone, with the goal of their immediate implementation, requiring no further action on the part of the customer.

Focusing on the optimal service of the subscriber, in 2014 the online procedures for individual and corporate subscribers of mobile, fixed and prepaid telephony were boosted thus increasing the total requests that can be completed by phone. This action strengthens and promotes direct and comprehensive subscribers service eliminating complex and lengthy procedures, reducing the processing time and ultimately enhancing the service experience.

Optimisation of recording process and monitoring of WIND network problems through Remedy platform

Remedy is a new platform for recording and monitoring problems in WIND network which was implemented in 2014.

It allows the groups that use it to manage in the best possible way the technical problems of customers, collecting in one system all the corrective and preventive activities required for the solution of a technical problem.

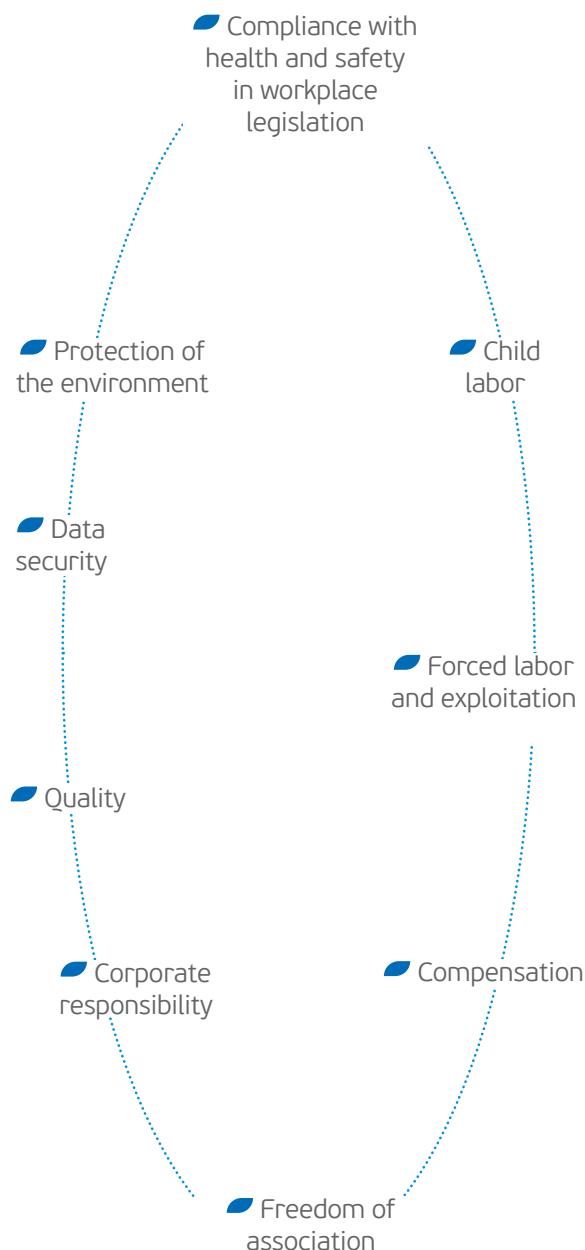
With the new platform the time required to address network problems is minimized thus contributing to providing quality service and increasing the level of subscriber satisfaction.

RESPONSIBLE PROCUREMENTS

Our relationships with suppliers are based on strict professional criteria, through the implementation of specific procedures that aim to control, as far as possible, the reliability of our suppliers.

Using specific forms, general conditions of cooperation or/and other procedures, we expect any supplier who is interested in joining the list of suppliers that work with our Company to comply with the obligations relevant to its business activities arising from the national and European legislation and to avoid any unfair and unethical professional practice.

According to the above, we expect our suppliers to meet the necessary conditions on the following topics:



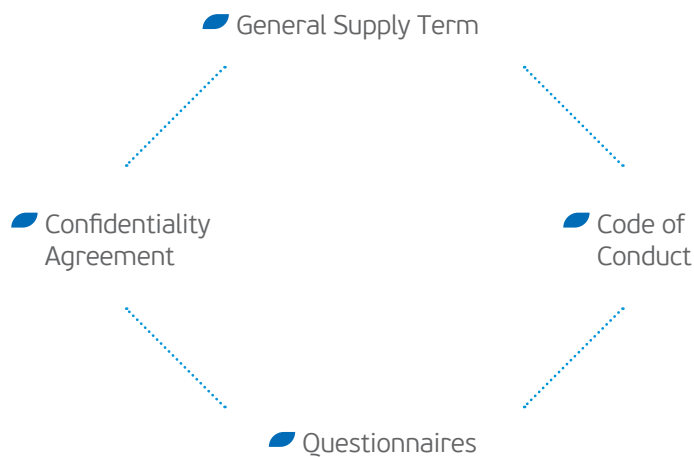
To ensure the integrity of the operation of our Supply Chain department, the transparency and the avoidance of any incidents of corruption, the selection and evaluation of our suppliers, the tenders and the daily procurement activities are carried out on the basis of detailed, documented and formal procedures that respect human rights and observe the principles of transparency by requiring specific procedures, controls and approvals.

Supply Department Procedures Chain

- Business Need Submission and Approval
- Tendering
- Ordering, Approval and Tracking
- Contract Management
- Suppliers/Partners Management

In 2014, in the context of promoting Corporate Responsibility in our supply chain, we keep sending the «Code of Conduct of WIND Hellas» to all our new suppliers, having set as a necessary condition of cooperation the acceptance of the Code.

In any case, acceptance / completion of the following documents is precondition for any new supplier in order to enter in our data-base.



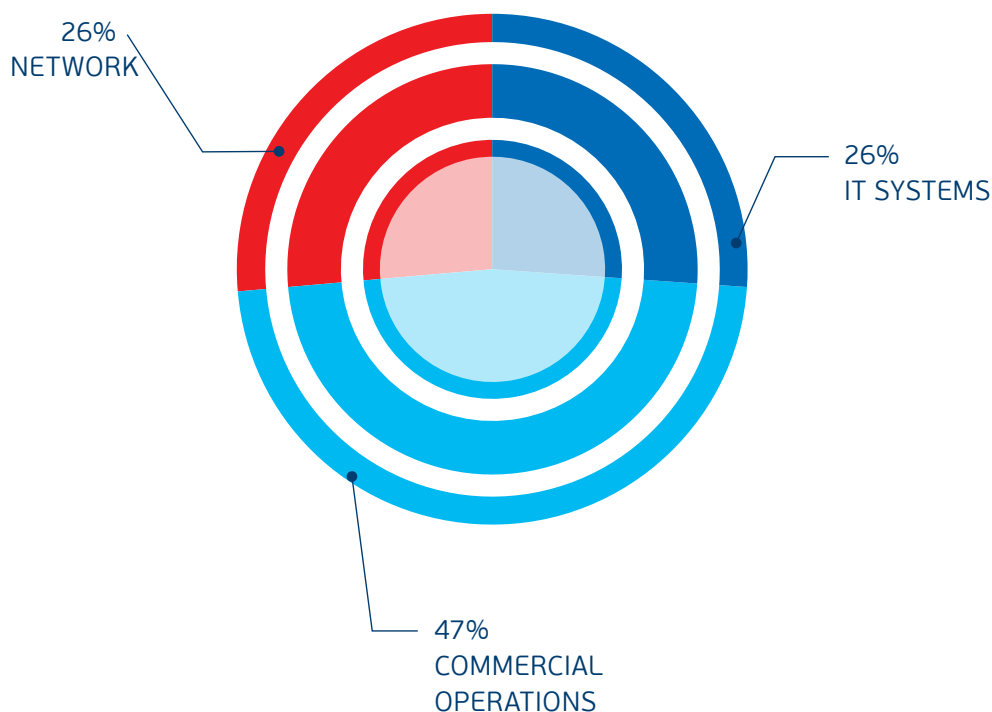
We evaluate our suppliers in accordance with the requirements of the management systems under ISO 9001 and ISO 14001, monitor tenders and perform inspections when appropriate.

In 2014, the relevant department of WIND continued to make regular visits to the premises of critical suppliers in order to verify they are in complete compliance with the requirements of the respective projects and that they meet the above-mentioned specifications. During the current year, we evaluated according to the specific procedures our **72 largest suppliers**.

67 of them were found that fully met the corporate performance criteria, while in 5 cases it was considered that further monitoring is required and therefore we proceeded to all necessary actions, taking all necessary measures.

Percentage of suppliers evaluated per category of product/service

Figure 1



We support local markets mainly through building/construction works for which we use local companies, while with respect to purchases of promotional materials and printing work, we typically use Greek companies.

The percentage of spending on local suppliers (Greek companies) was about 90% of WIND's total expenditures for 2014.

The majority of spending on non-local suppliers relates to the purchase of telecommunications products for which there is no local representation of the company in Greece.

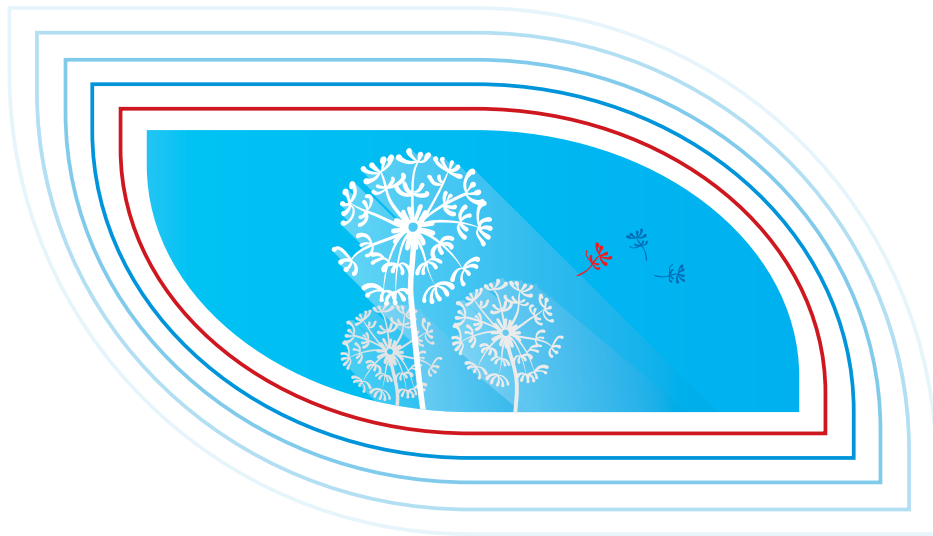
We strive to continually improve the efficiency and effectiveness of our supply chain by developing the qualitative characteristics of our supply-base, assessing the critical and major suppliers and taking all necessary action where necessary.

At the same time, we adopt new tools and methods to accelerate the operation, improve the monitoring and evaluation of critical performance indicators and maximise transparency of all procedures.

WE EVALUATED
72 Suppliers



9 ENVIRONMENT



BEYOND THE LEGAL OBLIGATIONS OF A MODERN CORPORATION TOWARDS THE ENVIRONMENT, NOWADAYS, NO COMPANY CAN BE SUCCESSFULLY ACTIVE IF IT DOESN'T CARE FOR SUSTAINABILITY AND THE IMPROVEMENT OF THE NATURAL ENVIRONMENT. IT IS A MAJOR SOCIAL CHALLENGE AND INVOLVES MORE AND MORE CITIZENS AND CONSUMERS.

IN 2014 AT WIND, WE GAVE EMPHASIS
ON THE FOLLOWING AREAS:

Energy consumption

- We reduced energy consumption by 6.722 GJ or 2,2% in relation with 2013

Emissions

- We reduced emissions by 3.428 tones of CO₂e or 4,2% in relation with 2013

3.428 tones of CO₂e means¹:

- The electricity consumption of 620 households for a year.
- The traffic 722 passenger vehicles for a year. **In order for this CO₂ to be absorbed we would need 5.713 acres of forest or 285.650 trees.**

Paper

- We have increased by **45%** the amount of paper saved by using MyWind digital platform service, particularly from not printing bills and saved 23.6 tons of paper.

23, 6 tones of paper that was not used, means:

- About **400 trees** were not cut or **8 acres of forest**

- Approximately **4.8 tonnes of carbon dioxide** were absorbed by these trees in one year

- About **7,000 cubic meters of water** were not used or the annual consumption of **27 households**

- And approximately **118.000 kWh** of energy was not consumed for the production of paper, the equivalent of the total electricity consumption of **24 households for an entire year**

¹Converters/tn: 17 trees, 300m3 of water, 5000kWh, absorption CO2 6tn/acre data (http://www.unep.org/pdf/BTC_Booklet.pdf, http://www.withouthotair.com/c15/page_95.shtml, www.paperoneweb.com.)

Average household consumption of water, electric energy : http://ec.europa.eu/energy/intelligent/projects/sites/iee-projects/files/projects/documents/energy_ambassadors_energy_ambassadors_guide_gr.pdf

Vehicles: 4,75tn CO₂e //vehicle/year (<http://www.epa.gov/cleanenergy/energy-resources/refs.html#vehicles>)

OUR POLICY OF A CLEANER ENVIRONMENT

In order to manage our environmental impact in the best way we designed, applied and maintained a Environmental Management System certified by ISO14001:2004.

Through this management system, we analyze and prioritize, monitor and record every aspect related to our environmental impact, actively promoting improvement.

PREVENTION of pollution

MINIMIZING environmental impact

REVIEW on a regular basis the System of Environmental Management

EDUCATION of our interested parties of environmental issues

COMPLIANCE with the requirements of the legislation

ENVIRONMENT

SIGNIFICANT IMPACTS

Through the implemented System as well as the Materiality Analysis we performed, we identified and monitored our significant effects.



2014

WE SAVED

- 400 trees

REDUSED

- Energy consumption by 2,2%
- Emissions by 4,19%

SAVED

- 45% more paper
- Electricity of 620 households
- 722 passenger vehicles motion
- 7.000m³ of water

Significant Environmental Impacts from our operations

Table 1

Issue	Environmental Impact	Action	Objective 2014	Result 2014
Energy Consumption	Depletion of natural resources, atmospheric pollution, contribution to climate change and atmospheric acidification	Energy saving projects (equipment renewal, building interventions, pilot installation of photovoltaic in remote base stations)	Reduction by 10.000GJ compared to 2013.	The final savings amounted to 6.722 GJ (67%).
Waste production	Depletion of natural resources, creation of pollution, landfill saturation	Actions with the threefold focus "Reduce – Re-use – Recycling"	Stop printing employees payroll, the printed material for procurement auctions and apply electronic signatures.	Completed
Electromagnetic energy emissions	Atmospheric pollution	Environmental Impact Assessments, EM energy emissions assessments, compliance with limits and standards set by Greek and EU legislation as well as international standards.	Monitoring emission limits with studies made by qualified actinophysics and field measurements made by labs certified by ISO17025	13 field measurements were made (100% of the requests).
Air conditioning of facilities	Atmospheric pollution, depletion of the ozone layer, contribution to climate change	Unit checks, replacement of coolant with zero ODP and reduced GWP.	Replacement or conversion of cooling systems in order to eliminate the use of HCFC	4 additional units were replaced

In 2014, expenses recorded as environmental protection, such as waste management, maintenance of the ISO14001-certified Environmental Management System, and compliance with obligations under Law 2939/2001 on alternative waste management, amounted to twenty thousand Euro approximately.

Regarding fines and penalties for non-compliance with environmental legislation, there were no relevant financial or non-financial penalties or actions in 2014.

CLIMATE, ENERGY AND ENERGY MANAGEMENT

TOTAL ENERGY CONSUMPTION

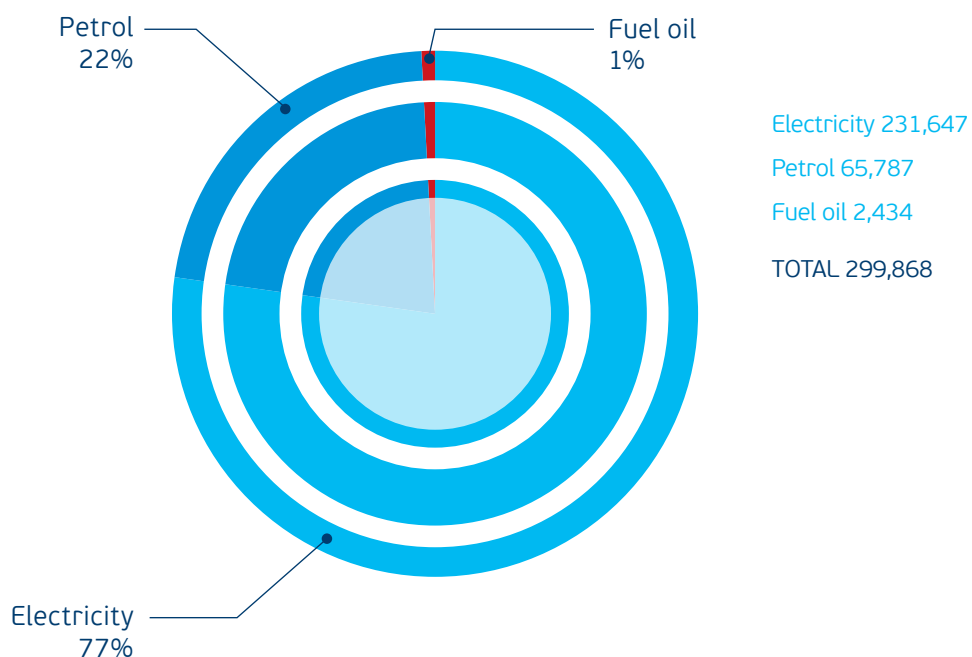
The majority of energy we consume is electricity, but we also use diesel fuel, heating oil and gas. The total energy recorded in 2014 reached 299.868GJ, including vehicle fleet fuel.

And the efficiency of energy used (energy intensity), expressed as units of consumed energy relating to the total annual revenue in 2014 amounted to 0,6GJ/€.

The energy we consume comes mostly from non-renewable sources. We pilot installed a limited number of solar arrays in hybrid power generators. In 2014 there were 5 such systems installed, and in 2015 further systems are going to be installed to remote base stations.

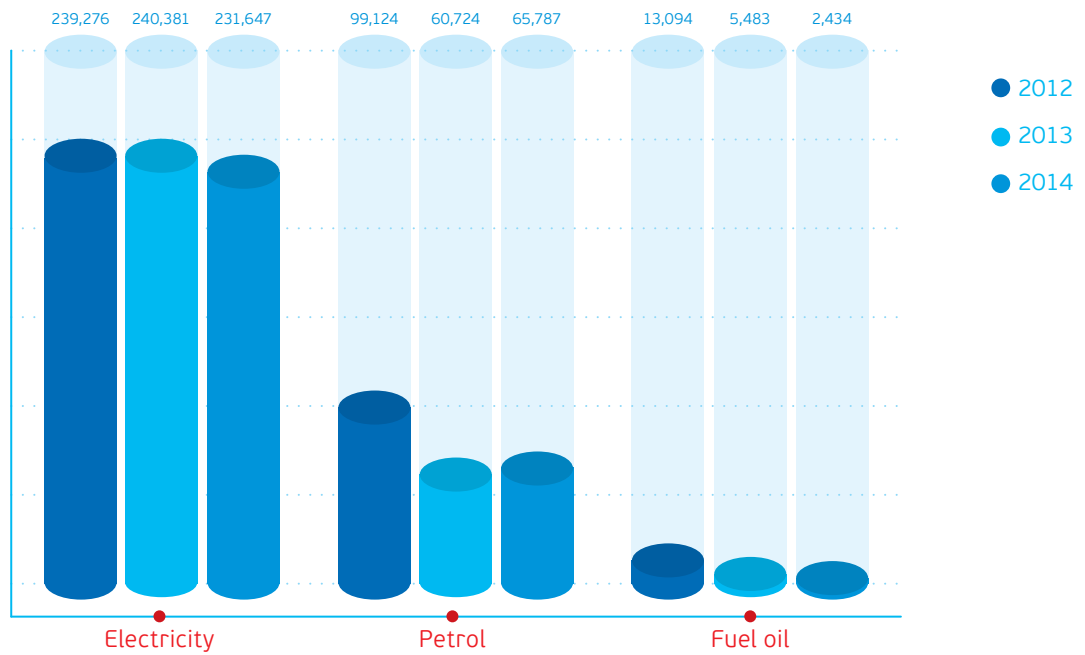
Energy Consumption Distribution 2014 (%)

Figure 1



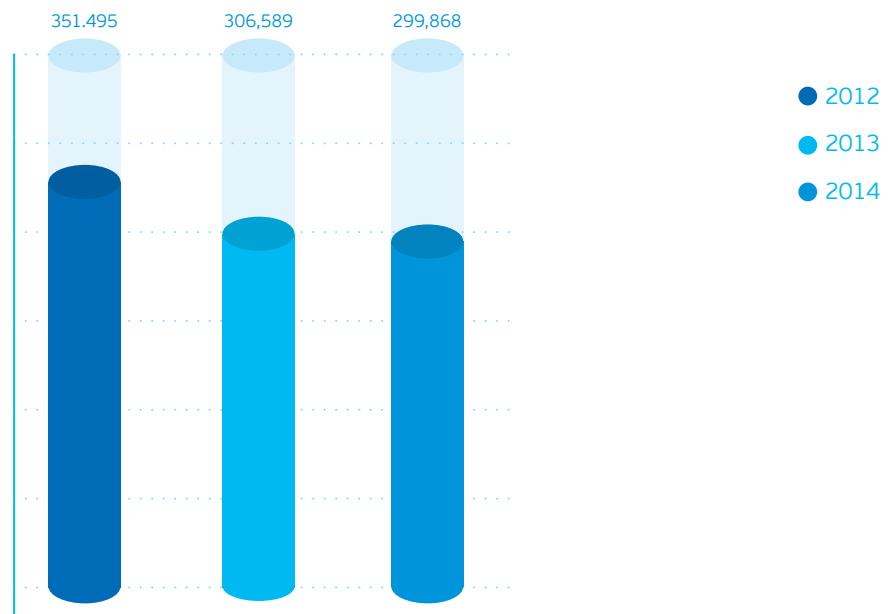
Energy Consumption Distribution 2012-2014 (GJ)

Figure 2



Total Energy Consumption 2012-2014 (GJ)

Figure 3



The reduction achieved in 2014 reached 6.722GJ and therefore, the target we had set for reduction in energy by 10.000GJ for 2014 was covered by 67%.

FUEL CONSUMPTION

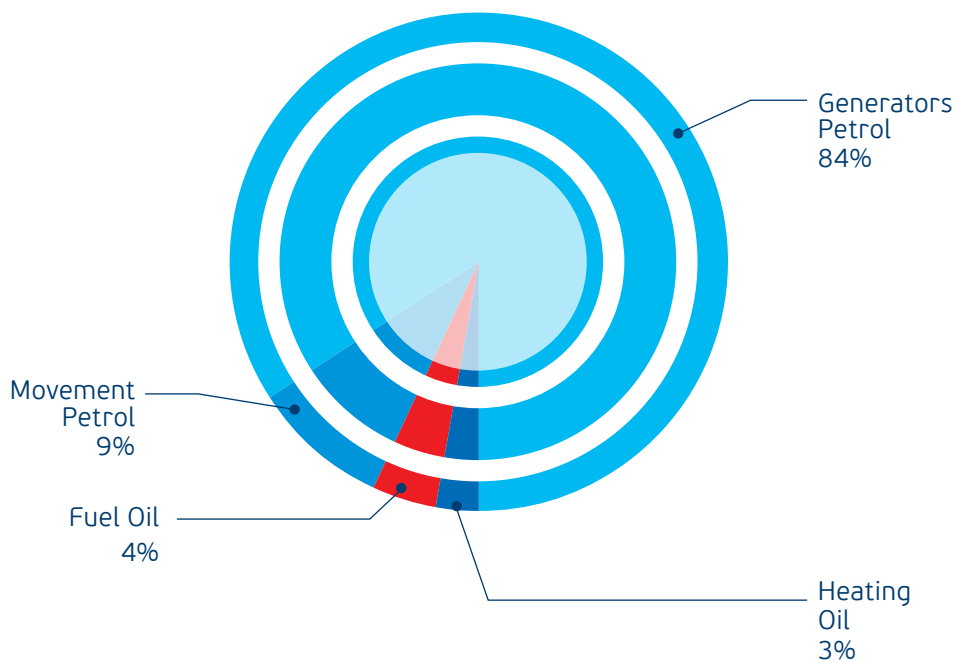
The sum of fuel that we use come from non-renewable sources.

Of the total fuel consumed 84% is used by generators for electricity production.

The remaining 16% was consumed for heating buildings and moving the vehicle fleet.

Energy consumption - Use of fossil fuels (%)

Figure 4

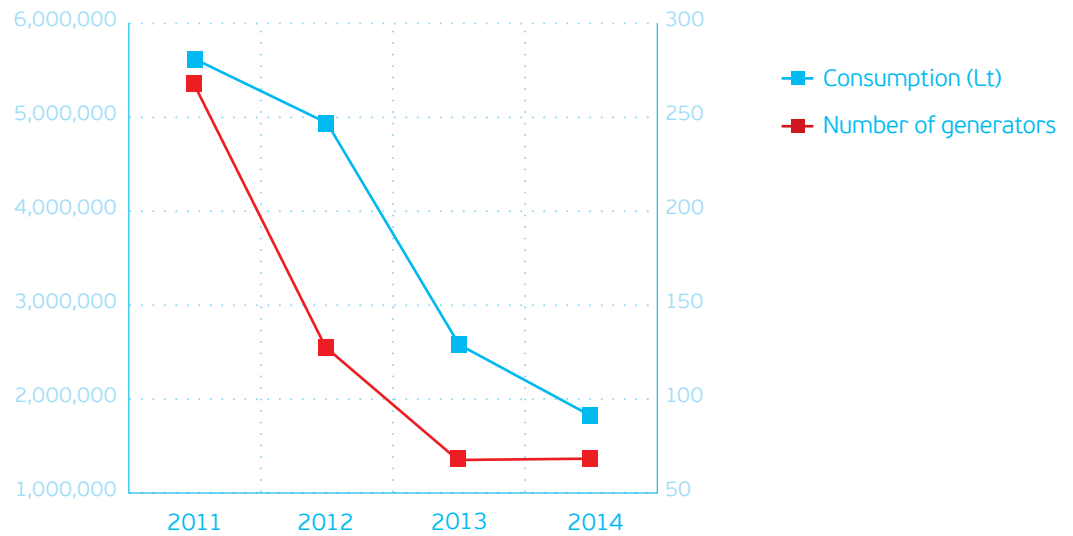


In order to reduce the fuel used for power generation in remote base stations we designed and completed a project for the replacement of generators with hybrid systems, recording significant savings on consumption.

The initial consumption magnitude on 5,000,000 liters per year before the initiation of project, and it was gradually reduced to only 1.127.500 million in 2014, a decrease of over 70% compared to baseline (2011-2012).

The reduction comes not only from the use of hybrid systems, but also by the repeal of a number of generators after connecting the station to the electricity grid (Figure 5).

Figure 5



In 2014, the consumption indicator per generator for the hybrid systems amounted to 4.708 liters.

The consumption indicator per generator for all systems (hybrid or not) amounted to 12.390 liters, increased by approximately 30% compared to 2013 due to fluctuation in the number of permanently operating generators without hybrid arrangement in 2014. Before starting the hybrid systems installation project, the average consumption per generator was 18.240 liters.

Regarding the fleet, after the completion of the fleet replacement project with new models, with diesel fuel, and reduced power consumption, the consumption per vehicle (annual) amounted to 1.323 liters or 0,066 liters per kilometer, slightly decreased compared to 2013 (1.378 liters per vehicle).



In addition, we routed a bus for connecting our largest building with the nearest metro station, thus promoting the use of public transportation. In 2014, on average, about 100 employees a week used this option in order to reach the metro station from their workplace.

For optimum energy management in our buildings (non-telecommunications equipment), in 2014 we conducted series of activities and settings.

We installed energy monitoring system to our most intensive and most populous building in order to better control energy consumption.

In addition, the temperature needs are monitored in real conditions allowing immediate and targeted interventions when needed, in the form of projects or simple configuration in air-conditioning/ventilation and heating. Furthermore, we proceeded to the optimization of thermic isolation of rooms and floors while we also proceeded to the re-insulation of pipelines in order to reduce losses.

Finally, we completed interventions in equipment, replacing equipment or performing inspections as required.

POLLUTANT EMISSIONS

Pollutant emissions amounted to **78.474** tonnes of carbon dioxide equivalent, reduced by **4.2%** compared to 2013.

For the calculation of emissions we use the calculation guide of the World Resources Institute . The exception are emissions from electricity consumption for which we use the average exchange rate of the Public Power Corporation which is our exclusive electric energy provider.

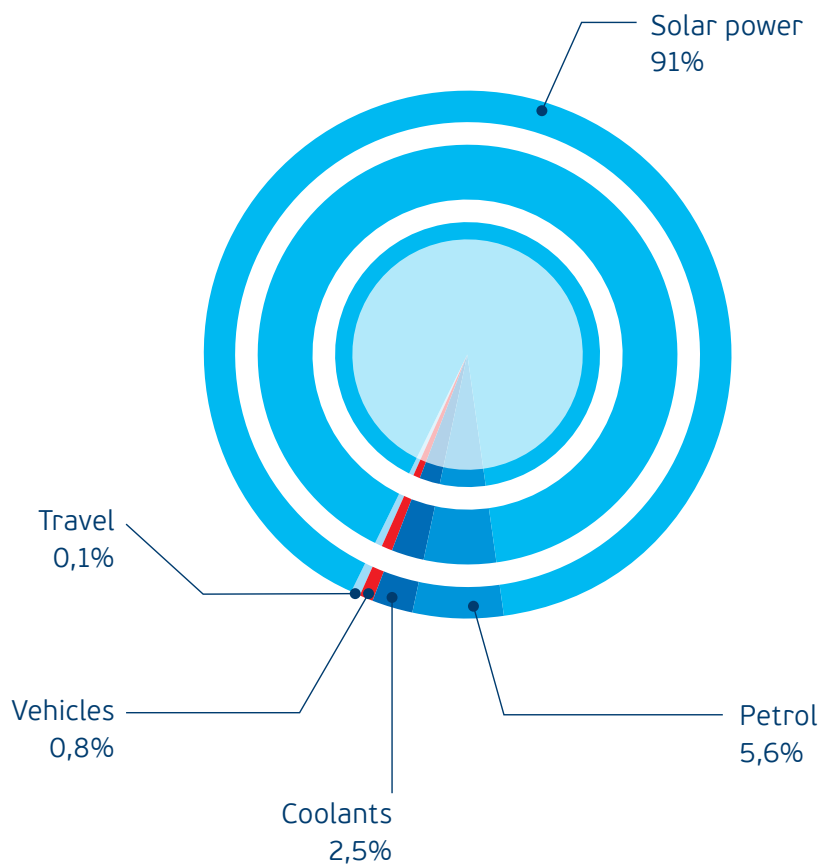
In 2014 we changed the average exchange rate we used (DEI 2009) with the most recently published index (2013), which amounted to 1,11kg / kWh. The evidence presented regarding pollutant emissions from electricity consumption have been recalculated with the new rate.

³World Resources Institute 2008: GHG Protocol Tool for Stationary Combustion Έκδοση 4 (2010).

⁴<https://www.dei.gr/Documents2/%CE%95%CE%9A%CE%95/EKE%202013%20gr.pdf>

Allocation of pollutants per source (%) 2014

Figure 6



Pollutants (tn CO₂e) 2012-2014 / Solar Power

Figure 7

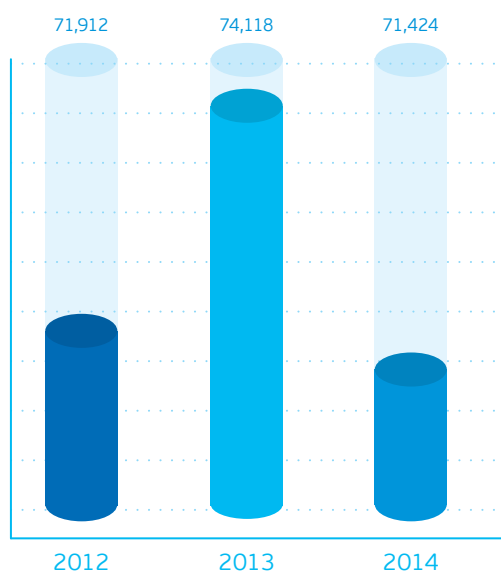
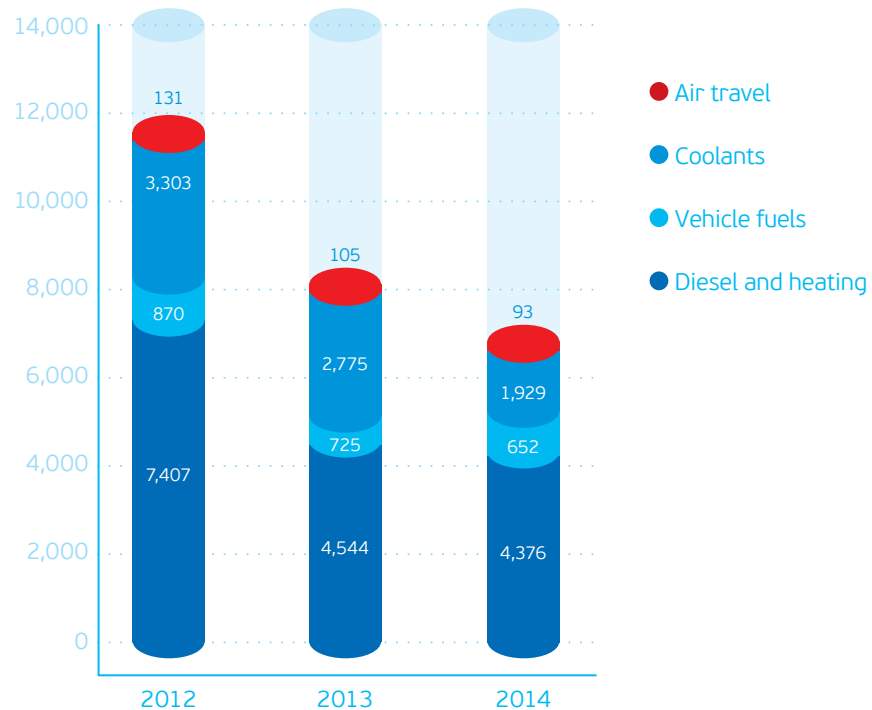


Figure 8



GREENHOUSE GASES THAT HARM THE OZON

There are no gas emissions that harm the ozone layer due to our operations, except from the use of air conditioners.

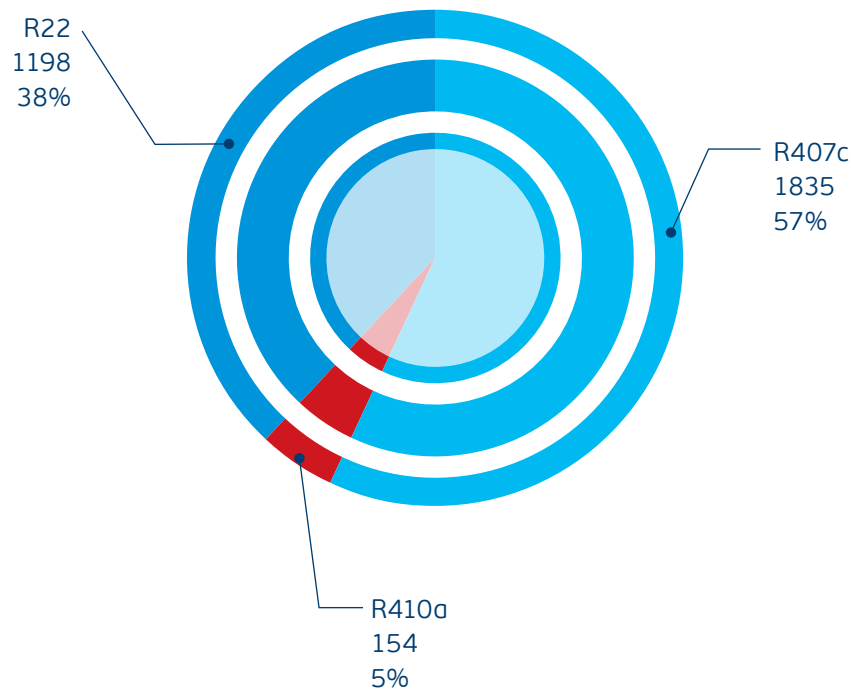
Considering that the amount filled into the circuit of each machine may have potentially leaked into the environment, we take this amount into account as a charge in the environment, the climate and ozone.

In order to calculate this charge, we use data of the IPCC (International Panel for Climate Change)⁵.

⁵GWP IPCC 100y

http://www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-2.html

<http://www.ipcc.ch/ipccreports/tar/wg3/index.php?idp=144>



WASTE PRODUCTION AND MANAGEMENT

The waste produced due to our operations are collected, separated and recycled, or whenever this is not possible for technical reasons, they are disposed for landfilling.

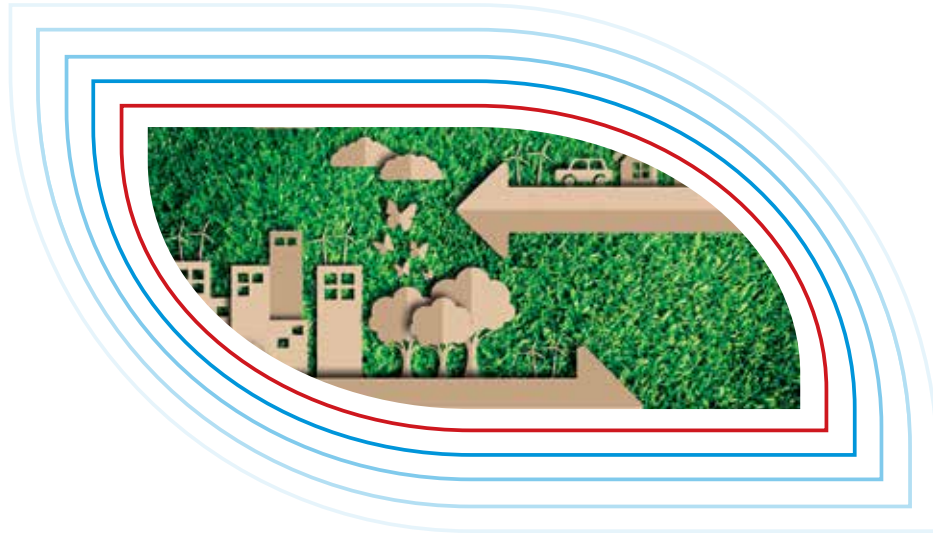
The main categories of produced waste are packaging waste (paper, wood, plastic), electrical and electronic equipment waste, accumulators and batteries and mixed (urban type) waste which are carried to landfills.

The management of the vast majority is made by disposal to licensed recycling and decontamination facilities, through a network of partners or/and relevant collective management systems.

Collective System	Waste Type
	Small batteries
	All types of electrical and electronic equipment
	Industrial type batteries, accumulators
	Industrial type batteries, accumulators
	Lighting equipments, light bulbs, luminaries
	All kinds of product packaging

Waste production in 2014 reached a total of 541.7 tons, compared to 397.9 tons in 2013. This increase is mainly due to increasing the amount of batteries delivered for recycling, for maintenance and / or upgrade antenna systems.

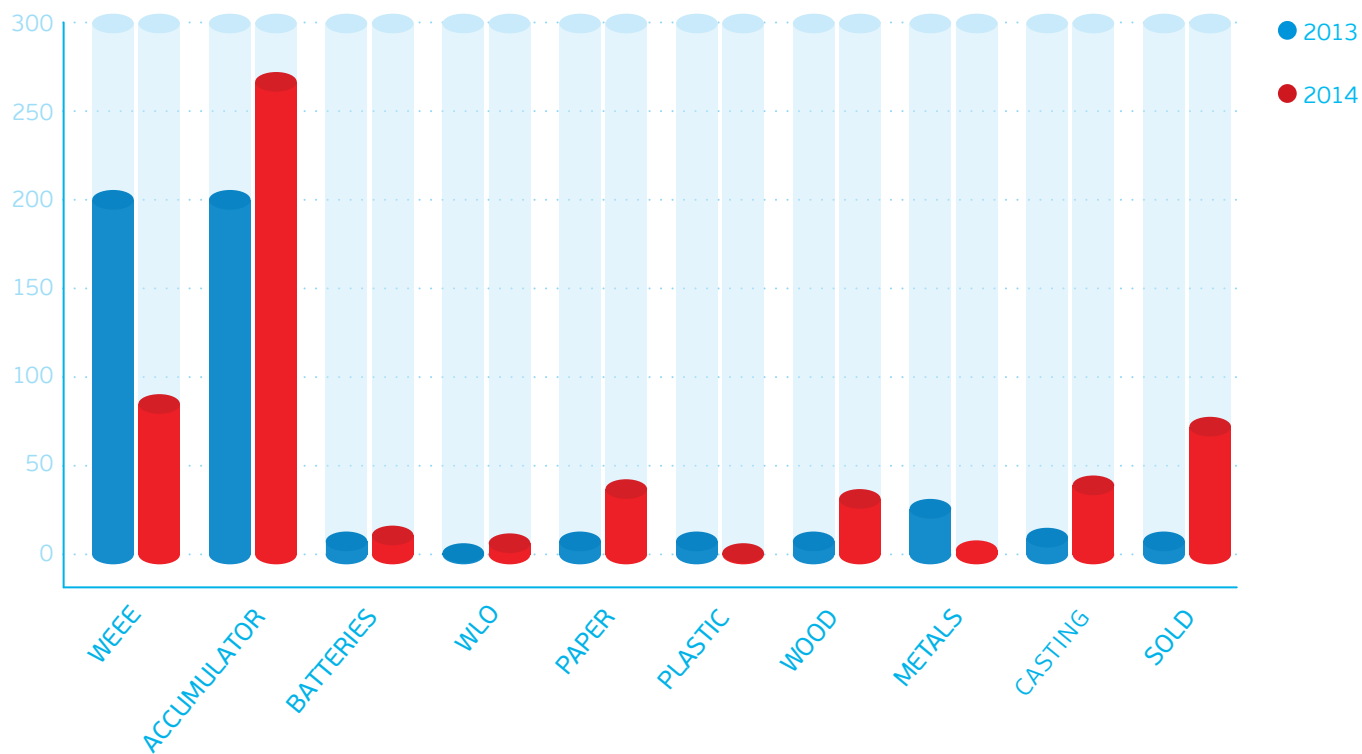
Waste production was higher on hazardous waste over non-hazardous, as the majority of waste (81%) are equipment (WEEE), batteries and lubricants waste. In the above quantity we also count the number of equipment sold to be reused in 2014 (73.1 tons, 13.5%).



In 2014, the non-hazardous waste was approximately 19.5% of total waste, consisting of non-hazardous recyclable materials (paper, plastic, wood, metal) and any urban mixed type waste generated by our operations and channeled into landfills. A total of 35 tons were channeled into landfills in 2014, equivalent to about 7% of the total waste, and apart from used EEE, sold for reuse, the remaining 80% of the total is managed in an alternative way, to licensed premises or through authorized collective management systems and is not sent to landfill. The total waste produced were managed within Greece.

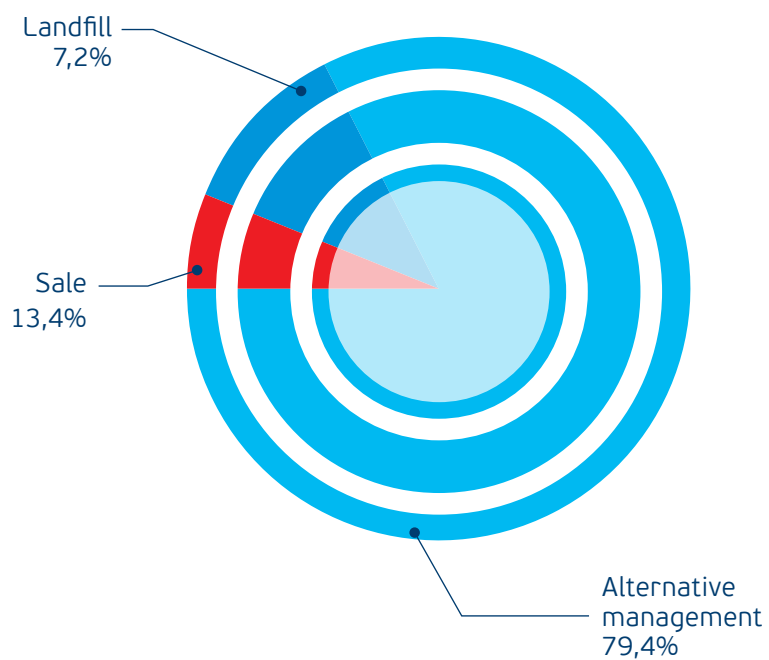
Waste Production 2013-2014 (tn)

Figure 10



Waste Production 2014 (%)

Figure 11



PAPER USE REDUCTION

The actions aimed at reducing paper is our oldest program. Those actions aim both in our internal processes, but also the general public and to our customers. Since 2001 we have started to eliminate the use of paper where feasible, having already implemented numerous actions such as:

INTERNAL ENVIRONMENT

- a) centrally regulated double-sided printing on all computers and possibility to scan documents, with an accompanying recycling program (bin on each printer on each floor in each building),
- b) intranet with a feature of exclusively electronic management of documents and procedures (no print at any stage)
- c) electronic version of payroll
- δ) e-bill to all our employee

STORES - PARTNERS - SUPPLIERS

- elimination of printing in specific documents where their communication to the shops used to be in print
- electronic invoice management,
- replacement of printers in stores with new models that print a smaller surface for specific documents,
- use of digital signatures.

SUBSCRIBERS:

- providing e-bill / e-services to subscribers for easy, fast, secure and paperless account management and other services from any device and accompanying actions to promote the use of the platform,
- new digital store. The new WIND stores offer a new, unique technology and service experience to consumers, and a better environmental profile. They fully integrate the capabilities of digital technology and eliminate the use of paper and printed

material for promotional purposes and advertising in a large scale. Through interactive touch screens and special software, visitors explore and personify their options in mobile, fixed telephony and Internet in every conceivable combination, without the need to refer to printed materials, and at the same time the use of posters in the shop is abolished.

STAKEHOLDERS/BODIES:

- Since 2013, we provide our report only in electronic form on a website (www.windsr2013.gr).

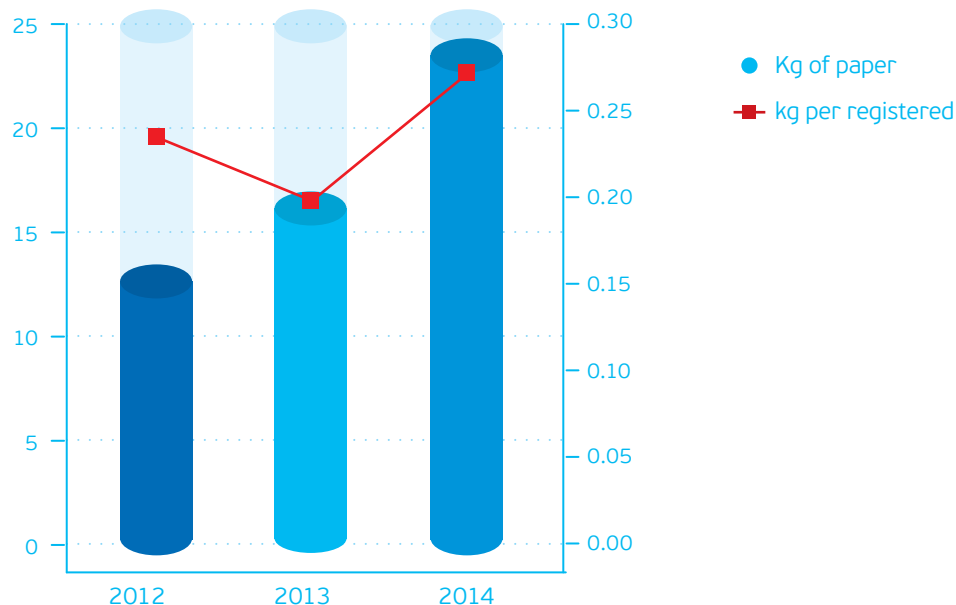
The results are equally important.

- By using the double-sided printing a paper reduction, was observed that in the first year of application reached the amount of 600.000 pages or the equivalent of 1.500 kg per year.
- By using the intranet and online circulation of the 7 most frequently used forms, approximately 60.000-70.000 sheets of paper are saved annually, the equivalent of approximately 300 kg.
- By changing several procedures concerning either the stores chain or offices, we estimate that tens of thousands of pages are saved annually, weighing over 10 tonnes (9.5 tons are derived from the change of a single process).
- By using e-bill, in 2014, at least 23.6 tons of paper were saved in a year. In 2014 we upgraded the systems that provide the electronic account management service («My Wind» platform) and now we provide the ability to the consumer to receive his bill in his email address as well, in addition to detailed information that is available through MyWIND platform.
- The new features provided a significant scope for further savings in the use of paper, and we recorded an increase of 45% in the amount of paper saved compared to 2013. The number of registered subscribers presented an increase of 2.7%.



Paper saved per year (Kg) from the use of e-bill.

Figure 12



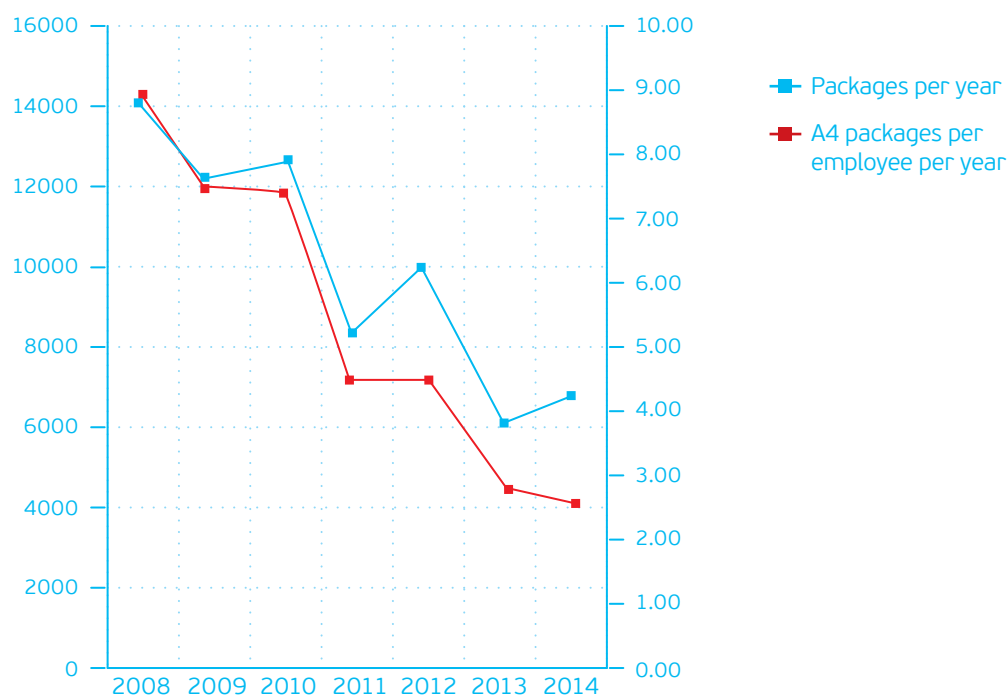
The paper consumption indicator per employee increased in 2014 to 11,1 kg per employee, compared to 9,7 kg in 2013, following the operation of VICTUS NETWORKS.

In absolute numbers, in 2014 we bought 10.825 kg of paper for office use over 11.100 kg in 2013.

In the long term, the improvement in this area is particularly big, since the index per employee for A4 packages has decreased from 8,8 A4 packages per employee per year to just 4,2 packages or almost half (52% reduction) in 2014.

Purchase and use A4 (packages) 2008-2014

Figure 13



10 OBJECTIVES & Results 2014



BELOW WE PRESENT
OUR PROGRESS IN 2014
AND OUR COMMITMENTS
AND OBJECTIVES FOR THE
CURRENT YEAR.
AT THE SAME TIME, WE
DESCRIBE THE POINTS WHERE
WE HAVE MADE PROGRESS,
WHERE WE SURPASSED
THE OBJECTIVES AND AT
WHICH POINTS THERE IS
ROOM FOR IMPROVEMENT.

Objective 2014	Result
CORPORATE RESPONSIBILITY	
The publication of the 8th Report according to the latest GRI G4 guidelines.	√
Updating the CR Team for the implementation of the new GRI guidelines in the Report 2014.	√
The use of a new tool for measuring social investments, SROI (Social Return on Investment).	√
Further development of the dialogue with our stakeholders.	√
The external verification of one and/or two chapter-s of the 8th annual Report.	√
CORPORATE GOVERNANCE	
Harmonization of our Business Continuity Management System with the constantly evolving environment of telecommunications and the international standard ISO 22301:2012 (Social Security Business Continuity Management System).	Completed projects: Documentation of Policy, Structure and Projects (systems and operations) Operational Continuity under the Strategic Planning and the Standard.
To conduct information programs to strengthen our culture and to promote the active participation of our employees and taking responsibility in relation to business continuity.	50 employees attended training seminars in relation to the principles of Business Continuity.
Re-certification of our Quality Assurance System in accordance with the requirements of the international standard ISO9001:2008.	√
Further simplification of our procedures, in order to put aside everything unnecessary and keep the essence.	√
Training all employees around the Code of Conduct and the capabilities for reporting Unethical Practices	√
Completion of certification (CIA, CFE) of the Internal Audit executives	In progress.
Distribution of internal questionnaire for measuring the compliance with the Code of Conduct and its Policies	The initial objective was reviewed and the questionnaire was added to the employees survey 2015.
Questionnaire for executives for «Conflict of Interest»	√
Establishing and communicating to the Company the 3 lines of defense model	√
MARKET	
The creation of combined products, in order to cover telecommunications needs.	√
Provide online tools to the end user that will give a better picture of the quality of his services, his account and the ways to manage them.	√
Provide fixed telephony and Internet services to new areas, with an expansion plan at 12 telecommunications nodes and expand the availability of VDSL in an additional 30.	√
Invest in maintaining the customer base and ensure revenues with targeted actions and tailor made offers according to the different needs of subscribers.	√
Adaptation of a new e-procurement tool, for further development of the effectiveness and efficiency of the Procurement department. This tool is expected to speed up the overall operation of the department, to improve the monitoring and evaluation of key indicators and assist greatly in the maintenance of transparency of all procedures	In progress.
Development of the quality characteristics of our supply base and certification of all our suppliers, by signing new general procurement conditions and accepting our official code of conduct.	√
Continue the evaluation of our major suppliers, through on-site visits.	√
ENVIRONMENT	
Reduction of total consumption by 10.000GJ, compared to 2013.	Covered by 67%.
Elimination of the use of HCFSs by the end of 2014.	In progress.
Routing of a bus for the connection of metro stations with WIND's most populated building, in order to promote the use of public transportation by the employees.	√
Elimination of printed employees payrolls and substitution with an e-document	√
Elimination of the use of printed materials in the Company's procurement procedures and the use and exchange of electronic documents, when possible. Start using digital signature at the stores outside WIND chain as well.	In progress
Start using digital signature at the stores outside WIND chain as well.	√

OBJECTIVES 2015

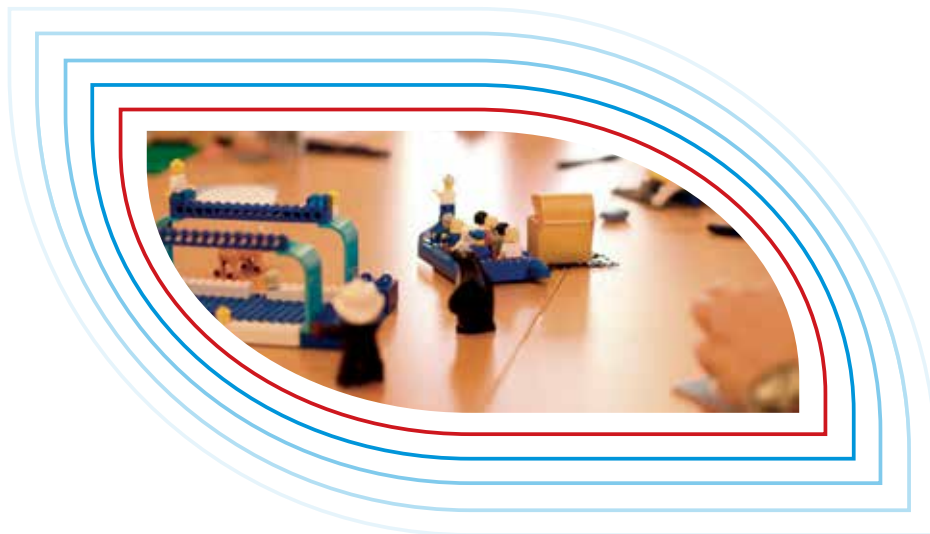


- The objective for 2015 is to further reinforce the message of integrity in WIND Hellas, through presentations and speeches to all employees.
- Strengthening the effort for simplification.
- Continuous Improvement and Development of the Business Continuity Management System within the radically changing environment in telecommunications but also according to the international standard ISO 22301: 2012 (Social Security Business Continuity Management System).



CORPORATE RESPONSIBILITY

- AA1000 Assurance Standard
- Participation and regular Update of the CR members about actions and activities that promote the concept of Responsibility within the company.
- Redesign of our CR strategy under the new social and business conditions



EMPLOYEES

- Talent Development Program
- Evolution of the recognition and excellent results award programs
- More training opportunities - e-learning platform
- Continuous improvement of benefits
- New HRMS – Self-service
- Synergies with educational institutions
- Expansion of the infrastructure modernization project
- Greater development of social action



MARKET

- Continuation and strengthening of the Customer Experience Program
- Creation of a platform for communication solutions with combined mobile-fixed telephony-internet services targeted to the needs of all household members.
- Provision of new connectivity options to a fully digital environment that makes best use of technology.
- Provision of online tools to the end user, that will give them a better insight of the quality of their services, their bill, as well as the ways to manage them.
- Provision of Fixed Telephony and Internet in new areas, with an expansion plan of up to 12 telecommunication hubs and expansion of VDSL availability to another 20



SOCIETY

- Support for TEDx events throughout Greece.
- Athletes sponsorship who are distinguished in long distances or at 5 and 10 km distances.
- Widening our plan, with creative actions and activities for the quality of life of animals and to address the increase of stray dogs and cats.
- Investment in social media for the penetration of our social actions in juvenile public and more people.



ENVIRONMENT

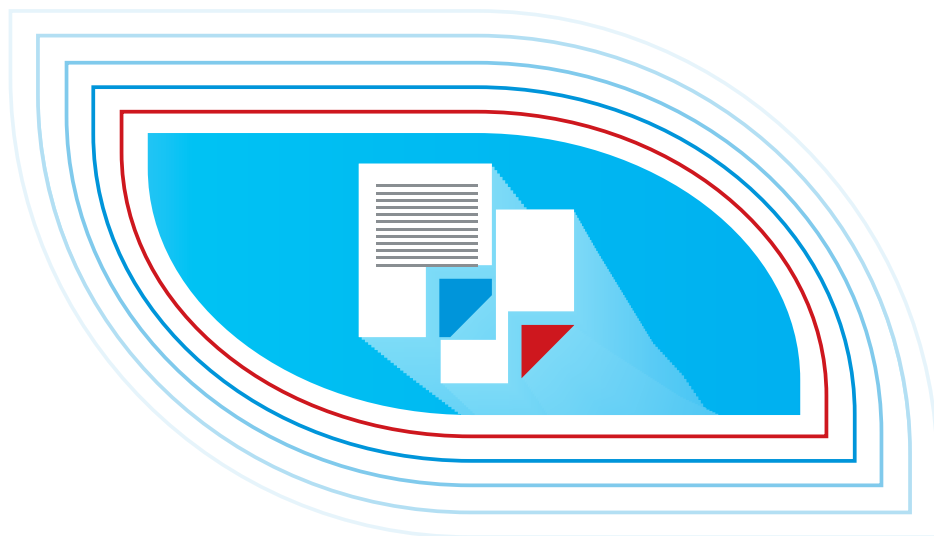
- Recertification of the Environmental Management System according to the requirements of the International Standard ISO14001: 2004.
- Reduction in energy consumption by 5.000GJ, compared to 2014.
- Continuation of the HCFC elimination program.
- Further paper savings by increasing MyWind/e-bill subscribers and the implementation of projects such as e-procurement.

11

UNITED NATIONS

GLOBAL COPMACT

Progress Report



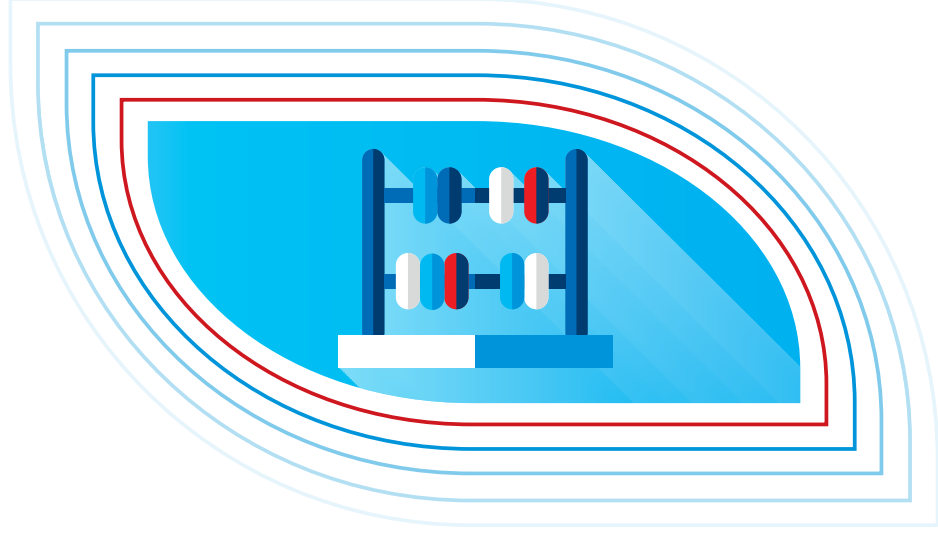
WIND HELLAS
SUPPORTS THE
10 PRINCIPLES OF
UNITED NATIONS
GLOBAL COMPACT

WIND HELLAS SUPPORTS THE
10 PRINCIPLES OF UNITED NATIONS
GLOBAL COMPACT REGARDING
HUMAN RIGHTS, LABOUR PRACTICES,
ENVIRONMENTAL PROTECTION
AND FIGHT CORRUPTION.

With intent to actively support and develop these principles in our sphere of influence, since 2008, we are committed to implement the Global Compact and its principles in our strategy, culture and everyday operation, and also to clearly communicate this commitment to our employees, partners, customers and the general public.

Focusing on monitoring and transparency, we report our progress in the various axes to all our stakeholders.

PRINCIPLE	INDEX OF GLOBAL COMPACT	REFERENCE (PARAGRAPH IN THE REPORT)
HUMAN RIGHTS		
Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights	Human Rights, Equal Opportunities, Responsible services
Principle 2	Business should make sure that they are not complicit in human rights abuses	Labour Conditions
LABOUR CONDITIONS		
Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	Freedom of Association
Principle 4	Businesses should uphold the elimination of all forms of compulsory labour	Human Rights & Equal Opportunities
Principle 5	Businesses should uphold the effective abolition of child labour	Responsible Association
Principle 6	Businesses should uphold the elimination of discrimination in respect of employment and occupation	Human Rights & Equal Opportunities
ENVIRONMENT		
Principle 7	Businesses should support a precautionary approach to environmental challenges	Environment, Significant Environmental impacts
Principle 8	Businesses should undertake initiatives to promote greater environmental responsibility	Reduce paper usage, Environment
Principle 9	Businesses should encourage the development and diffusion of environmentally friendly technologies	Reduce paper usage, Environment
ANTI-CORRUPTION		
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery	Compliance System



12

GRI TABLE

INDICATORS AND CERTIFICATIONS

Global Reporting Initiative (GRI) G4 CONTENT INDEX

GRI INDICATOR	DESCRIPTION	REFERENCE	EXTERNAL ASSURANCE
STRATEGY AND ANALYSIS			
G4-1	Statement from the most senior decision-maker of the organization.	Message from the Chairman of the Board and CEO	Yes

ORGANIZATIONAL PROFILE			
G4-3	Name of the organization	WIND HELLAS Telecommunications S.A.	Yes
G4-4	Primary brands, products, and/or services	WIND HELLAS	Yes
G4-5	Location of the organization's headquarter	WIND HELLAS	Yes
G4-6	Number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report	WIND HELLAS	Yes
G4-7	Nature of ownership and legal form	Anonymous Commercial and Industrial Company	Yes
G4-8	Markets served	WIND HELLAS	Yes
G4-9	Scale of the reporting organization	Economic development and Feature sizes	Yes
G4-10	Total workforce by employment type, employment contract, and region, broken down by gender	Employees	Yes
G4-11	Percentage of total employees covered by collective bargaining agreements	Human Resource Data	Yes
G4-12	Description the organization's supply chain	Market	Yes
G4-13	Significant changes during the reporting period	There were no significant changes	Yes
G4-14	Explanation of whether and how the precautionary approach or principle is addressed by the organization	Regulatory Behaviour Systems	Yes
G4-15	Externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or endorses	Society	Yes
G4-16	Memberships of associations (such as industry associations) and national or international advocacy organizations in which the organization participates	We promote responsible Business and technological innovation	Yes

IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES			
G4-17	List of entities included in the organization's consolidated financial statements or equivalent documents	Economic development and Feature sizes	Yes
G4-18	Process for defining report content	We approach the important issues responsibly	Yes
G4-19	List of Material Aspects identified in the process for defining report content	We approach the important issues responsibly	Yes
G4-20	Aspect Boundary within the organization for each Material Aspect	Table of substantive issues and limits (Annex A)	Yes
G4-21	Aspect Boundary outside the organization for each Material Aspect	Table of substantive issues and limits (Annex A)	Yes
G4-22	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such restatement	There are no revised information	Yes
G4-23	Significant changes from previous reporting periods in the scope and Aspect Boundaries	There are no changes	Yes

Πίνακας Δεικτών GRI-G4 IN ACCORDANCE - CORE

GRI INDICATOR	DESCRIPTION	REFERENCE	EXTERNAL ASSURANCE
STAKEHOLDER ENGAGEMENT			
G4-24	List of stakeholder groups engaged by the organization	Our stakeholders	Yes
G4-25	Basis for identification and selection of stakeholders with whom to engage	Our stakeholders	Yes
G4-26	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	Our stakeholders	Yes
G4-27	Key topics and concerns that have been raised through stakeholder engagement	Our stakeholders	Yes
G4-28	Reporting period information provided	In relation to the report	Yes
G4-29	Date of the most recent previous report	In relation to the report	Yes
G4-30	Reporting cycle	Annual	Yes
G4-31	Contact point for questions regarding the report or its contents	WIND HELLAS	No
G4-32	Table identifying the location of the Standard Disclosures in the report	In relation to the report	Yes
G4-33	Policy and current practice with regard to seeking external assurance for the report.	GRI Table indicators and certifications	Yes
GOVERNANCE			
G4-34	Governance structure of the organization	Governance Structure of Our Corporate Responsibility	Yes
ETHICS AND INTEGRITY			
G4-56	Values, principles, standards and norms of behavior of the reporting organization	Corporate Governance, Regulatory Behaviour Systems	Yes

IN ACCORDANCE - CORE SPECIFIC STANDARD DISCLOSURES

MATERIAL ASPECT	GRI INDICATOR	DESCRIPTION	REFERENCE	EXTERNAL ASSURANCE
ECONOMIC				
Economic Performanc	G4-EC1	Direct economic value generated and distributed	Economic development and Feature sizes	Yes
Indirect Economic Impacts	G4-EC7	Development and impact of infrastructure investments and services supported	We promote responsible Business and technological innovation	Yes

ENVIRONMENTAL				
Energy	G4-EN3	Energy consumption within the organization.	Climate, Energy and Energy Management	Yes
	G4-EN5	Energy intensity	Climate, Energy and Energy Management	Yes
	G4-EN6	Reduction of energy consumption	Climate, Energy and Energy Management	Yes
Emissions	G4-EN15	Direct greenhouse gas (GHG) emissions (scope 1)	Pollutants	Yes
	G4-EN16	Energy indirect greenhouse gas (GHG) emissions (scope 2)	Pollutants	Yes
	G4-EN17	Other indirect greenhouse gas (GHG) emissions (scope 3)	Pollutants	Yes
	G4-EN19	Reduction of greenhouse gas (GHG) emissions	Pollutants	Yes
	G4-EN20	Emissions of ozone-depleting substances (ODS)	Greenhouse gases that harm Ozone (ODS)	Yes
Effluents and Waste	G4-EN23	Total weight of waste by type and disposal method	Production and Management waste	Yes
	G4-EN25	Weight of transported, imported, exported, or treated waste deemed hazardous	Production and Management waste	Yes
Compliance	G4-EN29	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	Our policy for a clean environment	Yes

SOCIAL				
Employment	G4-LA2	Benefits provided to full-time employees	Extra benefits	Yes
Occupational Health and Safety	G4-LA6	Type of injury and rates of injury, occupational diseases, lost days, and absenteeism,	Health and Insurance	Yes
Diversity and Equal Opportunity	G4-LA12	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	Human rights and equal opportunities	Yes
Local Communities	G4-S01	Percentage of operations with implemented local community engagement, impact assessments, and development programs	Electromagnetic radiation	Yes
Anti-corruption	G4-S05	Confirmed incidents of corruption and actions taken.	Responsible procurement, UN Global Compact	Yes
Anti-competitive Behavior	G4-S07	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes	Responsible Marketing	Yes
Customer Privacy	G4-PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	Copyright and secrecy of communications	Yes

External Assurance Report for WIND HELLAS 2014 Sustainability Report

This External Assurance Report was conducted by the Centre for Sustainability and Excellence (“CSE”) and refers to the 2014 Sustainability Report of WIND HELLAS (“Report”) for the period between January 1st 2014 and December 31st 2014. The goal of the assurance process is to give confirmation to the stakeholders of WIND HELLAS for the accuracy, the reliability and objectivity of the information in the Report, and that it covers all the material issues for WIND HELLAS and for the main stakeholder groups. The 2014 Sustainability Report of WIND HELLAS has been compiled according to the G4 reporting guidelines (“in accordance-core”) of the Global Reporting Initiative (GRI).

Work Scope

The work scope included the review of the activities in the 2014 Sustainability Report, and the data for WIND HELLAS performance during the reporting period. Specifically, it included:

1. Statements, information and performance data included in the report.
2. The procedures of WIND HELLAS for determining the material issues which are included in the Report, and the approach of WIND HELLAS management towards the material issues.
3. The data and information included in the Report according to the specifications of the GRI’s G4 reporting guidelines, as presented in the GRI Table.

The external assurance process was conducted according to the specifications of the internationally recognized assurance standard AA1000AS (2008). The work scope was defined and agreed upon with WIND HELLAS to be a Type 2 limited assurance.

General Conclusions

With respect to the work scope, it was observed that:

- The description of the activities and performance of WIND HELLAS for 2014, and how they are presented in the Report is accurate.
- WIND HELLAS meets the principles of inclusivity, materiality and responsiveness, as they are defined in the AA1000 (2008) assurance standard.

In case of any disagreement in translation between the Greek and English version of the Report, the Greek version prevails for our conclusions.

Main Observations and Recommendations

WIND HELLAS achieved important improvements in the management and presentation of its sustainability performance during the reporting period, such as:

- Conducted more than 100 simplifications in its processes, recognizing the benefits of the principle of simplicity, demonstrating significant results on the impacts from its operation to the pillars of sustainability.
- Achieved significant reductions to the areas of energy consumption, emissions, while considerably increased the percentage of recycling of waste.
- Designed a plethora of employee development programs (such as WINDisU, Leadership, Customer Service, Customer Development, Sales Excellence).

- Implemented successfully the action plans derived from the employee survey.

According to the observations and conclusions from the external assurance process, the main observations and recommendations for the improvement of future Sustainability Reports of WIND HELLAS are:

- With respect to the principle of inclusivity, it is recommended that WIND HELLAS maintains and further develops the existing stakeholder engagement and communication model.
- With respect to the principle of materiality, it is recommended that WIND HELLAS maintains the existing procedures for determining material issues, and aim at expanding them further, e.g. by publishing the approach for handling and resolving disputes or grievances about possible different expectations about materiality.
- With respect to the principle of responsiveness, WIND HELLAS could enhance the existing approach for incorporating the needs and expectations of the stakeholders to the products, services and programs it develops.
- It is recommended for WIND HELLAS to continue, and expand, the use of tools and innovative methodologies for the monitoring of its sustainability performance.
- Given the increasing importance of managing a sustainable supply chain, WIND HELLAS should continue and further develop the incorporation of its sustainability policy and practices to the supply chain through supplier and associate selection, evaluation and interaction according to sustainable criteria.
- WIND HELLAS environmental efforts, which are part of the long-term commitment towards environmental protection, as they are expressed, for example, through the measurements and reductions in emissions and energy/fuel consumption, and the effective waste management, should continue and expand.

Findings and Conclusions About the Principles:

- Of inclusivity – how the stakeholder groups were recognized and how the communication with them about sustainability issues took place. Nothing was detected that would lead to the conclusion that primary stakeholder groups were excluded from the communication activities, or to conclude that WIND HELLAS has not implemented the appropriate principles during the development of its approach towards sustainable development.
- Of materiality – how the evaluation and determination of the sustainability material issues took place. Nothing was detected that would lead to the conclusion that the process of determining the material issues from WIND HELLAS does not provide a balanced representation of the performance in the material issues with respect to sustainable development.
- Of responsiveness – how WIND HELLAS responded to the issues set by the stakeholder groups and how this process is described in the Report. Nothing was detected that would lead to the conclusion that WIND HELLAS has not implemented the principle of responsiveness during the selection of the issues described in the Report.
- The Specific Performance Information. Nothing was detected that would lead to the conclusion that the quantitative data which relate to the GRI G4 indicators have not been collected with the most appropriate and commonly accepted ways. Indicative indicators:

- Methodology for measuring and calculating Greenhouse Gas emissions.
- Methodology for measuring electromagnetic energy.
- Data and records about the number and distribution of employees.
- Data and records about the health and safety of employees.
- Data and records about employee training programs.
- Data about the communication of new policies about the avoidance of cases of Conflict.

Interests according to the Code of Conduct.

- Data and records about informing and evaluating suppliers.
- Data and records about informing and evaluating suppliers.
- Examples of complaints and the methodology WIND HELLAS follows for handling them.
- Confirmation of statements about the non-existence of fines or other legal implications about non-compliance with legislation and regulations.
- Data and records about energy consumption and reduction.
- Data and records about hazardous waste generation and management.
- Minutes of meetings of WIND HELLAS committees (and topics discussed).

Methodology

For conducting the external assurance the following processes were followed:

- Analyzed and examined at random the processes which relate to stakeholder identification and communication.
- Surveyed the processes for detecting and determining the material issues which were included in the Report.
- Conducted meetings and interviews with selected executives of WIND HELLAS which have the operational responsibility for sustainability issues, as well as with the members of the Social Responsibility Team of WIND HELLAS, in order to understand the administrative structure for managing sustainability issues, the stakeholder engagement process, and the implementation and monitoring of sustainability policies and activities.
- Conducted random examination of basic structures, systems, procedures and certifications which relate to the collection, concentration, verification, process and presentation of selected indicators of sustainability.
- Surveyed the information and clarifications which support claims included in the Report.

Exceptions and Limitations

Information related to the following was excluded from the assessment:

- Activities outside the reporting period or the Report's boundaries.
- Statements about WIND HELLAS positions.
- Financial data which are derived from the Annual Financial Report of WIND HELLAS which is assured by external financial auditor.
- Content of websites or texts by third parties.

Responsibilities of WIND HELLAS and the External Assurance Provider

The preparation and presentation, and the content of online versions, of the Report is an exclusive responsibility of WIND HELLAS. CSE's responsibility is to provide external assurance to the stakeholder groups for the accuracy, the reliability and the objectivity of the information contained in the Report, and to express a total opinion with respect to the work scope as it is defined in the present assurance report.

CSE recognizes the needs for a thorough, transparent assurance process in order to ensure reliability, and act as a tool for improving the performance of WIND HELLAS about its strategy for sustainable development and sustainability reporting. This is achieved by providing unbiased commentary, through the present assurance report, on the reporting process, and by making recommendations for further improvement.

Independence, Impartiality and Competence Statement of CSE

This is the first time CSE provides external assurance services to the Sustainability Reports of WIND HELLAS. CSE confirmed to WIND HELLAS that it has maintained its independence and objectivity and, specifically, that there were no incidents and no services provided that could influence its independence and objectivity.

CSE's external assurance team has extensive international knowledge in providing assurances services, conducting audits and evaluations of issues and systems relating to the environment, the society, the employees, the recognition and communication of stakeholder groups, the determination and representation of material issues, and through the combined experience in this field, an excellent understanding of good practices in sustainability and in external assurance. .

On behalf of the Assurance Team

Nikos Avlonas

CSE President



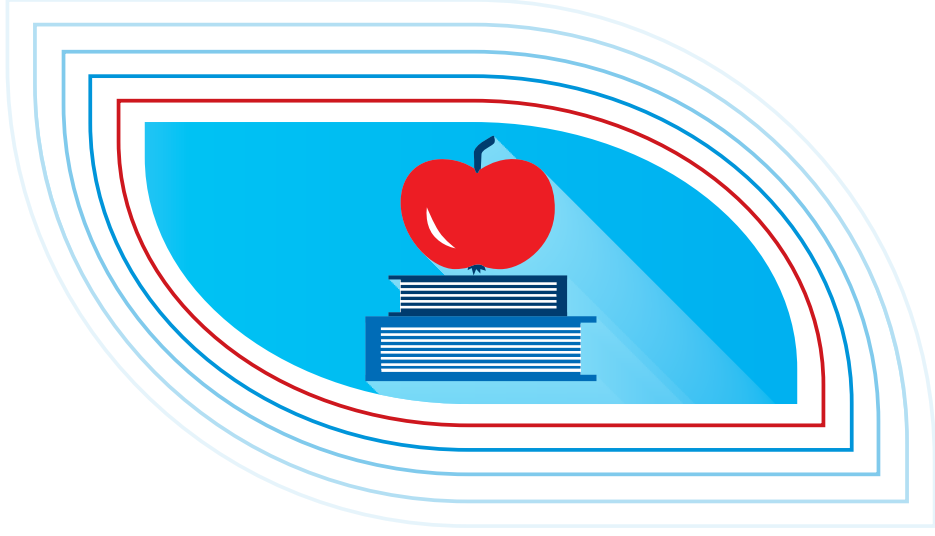
CENTRE for SUSTAINABILITY
and EXCELLENCE



AA1000
Licensed Assurance Provider
000-142

13

GLOSSARY



WEEE:

Waste of Electrical and Electronic Equipment

ALE:

Waste Lubricating Oils

NETWORK TRUNK:

The central and highest part of a hierarchical telecommunications network, through which various sub-networks are interconnected, ensuring geographic coverage.

EETT:

National Telecommunications and Post Commission. It is the Independent Authority that controls, regulates and supervises the markets for electronic communications and post.

OPTICAL FIBER:

High technology telecommunication cables, in which the transmission data is annealed at frequencies of light spectrum, assuring very high speeds of transmission, very low level signal attenuation and very high level of interference protection. Operation is based on the reflection of light into the fiber.

BASE STATIONS:

Fixed locations of the mobile telephony network, through which data and information reception and transmission take place, so that network coverage is expanded and also shared with hierarchically lower networks.

COLLECTIVE MANAGEMENT SYSTEM:

Partnership of producers for products subject to the requirements of the principle «the polluter pays» in order to arrange a recycling system with competence to recover from consumers, and separate appropriate waste management of these producers, after the end of their useful life. In Greece collective management systems work for waste packaging products, electrical/electronic and consumables, batteries and accumulators, lubricating oil waste, old vehicles and vehicle tires.

MULTIMEDIA INFORMATION SERVICE:

The Multimedia Information Services means electronic communication services

relating to the transmission of information / content in electronic communication networks, where the invoicing is carried out through the billing of calls to numbering resources from the National Numbering Plan, especially the rows 901, 909, 14, 190- 195 and 54 (services eg SMS, MMS, Audiotext, Videotext, etc.)

LANDFILL:

Landfill

AA1000 ACCOUNTABILITY:

Standard that provides a framework so that the firm can identify, prioritize and meet challenges of corporate responsibility. It covers issues relating to corporate governance, organizational strategy, as well as providing operational guidance to ensure sustainability and participation of stakeholders.

BUSINESS CLOUD:

It concerns the case in which services and data that involve customer use are stored on computers located in data centers outside the area and its infrastructure.

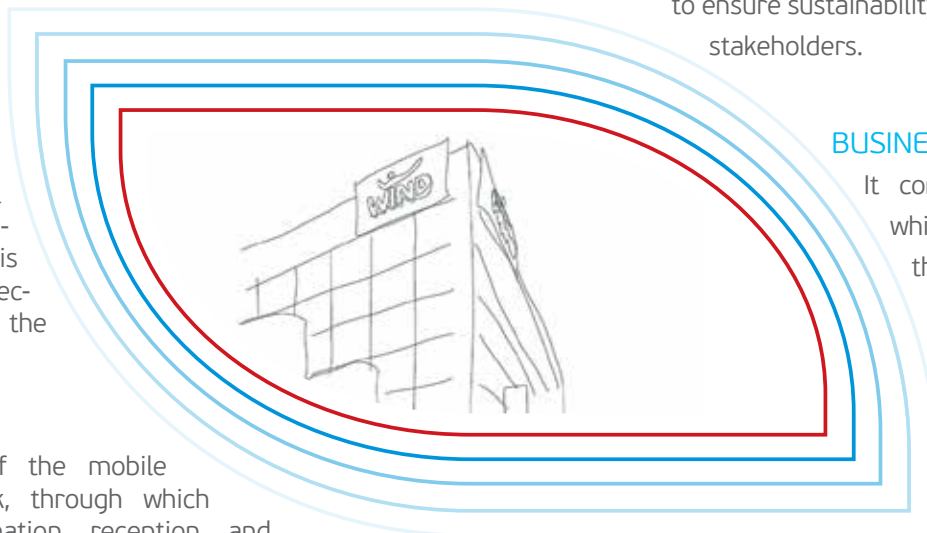
EXTRANET:

A network of computers and data, which is fully or partially accessible for a specific purpose or use from points outside that network. Frequently the term is also used for the companies' portal which is accessible by associates, sales network, etc.

INTERGOVERNMENTAL PANEL FOR CLIMATE CHANGE/IPCC

Scientific intergovernmental committee under the auspices of the United Nations concerning the evaluation of the scientific knowledge base and research conducted for the study of climate change, as well as the consequences of human activity.

GLOSSARY



2014



GBPS:

Measurement unit of the rate of data transmission (Gigabit per second).

GJ/GIGAJOULE:

Energy measurement unit which is equivalent to 277,77 kWh.

GLOBAL REPORTING INITIATIVE (GRI):

Global Reporting Initiative GRI's mission is to cover the need to create a global and reliable framework of concepts, common language and measurement systems for reports on Corporate Responsibility, which can be used by organizations of any size or industry, wherever they are.

GR-IX:

High-speed connection (Greek Internet Exchange) between Internet Service Providers operating in Greece, through which their traffic is directly exchanged, resulting in faster service to Internet users.

MATERIALITY ASSESSMENT:

It is used to help us Identify and focus on the topics that are of most importance for our internal and external Stakeholders.

ODP (OZONE DEPLETING POTENTIAL):

Index measuring the ability of a chemical substance or mixture to interact with ozone layer and cause wear.

ODS (OZONE DEPLETING SUBSTANCES):

Groups of substances and mixtures with main representatives being chlorofluorocarbons (CFC) and hydrochlorofluorocarbons (HCFC) which cause wear and reduction in the ozone layer.

ROHS:

A standard which sets the limit to the quantity of metals and substances, in general, used for the manufacture of electronic devices in order to reduce their impact on the environment.

SPECIFIC ABSORPTION RATE (SAR):

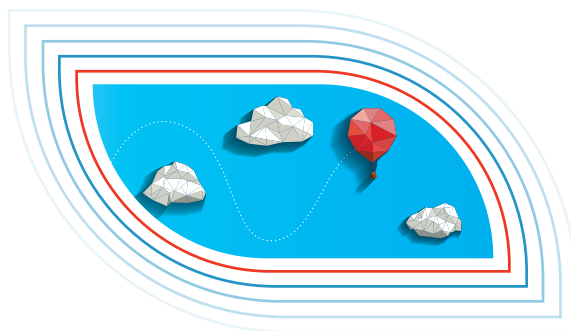
A measure of the rate at which energy is absorbed by the human body when this is exposed to electromagnetic fields (e.g. mobile phone field). SAR is measured in a specific manner and there are acceptable safety limits.

VDSL:

It is the most modern version of DSL technology, offering much higher access speeds to the Internet (download and upload) compared to ADSL. In Greece there are commercially available VDSL products with speeds up to 50Mbps.

ANNEX A' 2014

TABLE OF SUBSTANTIVE ISSUES AND LIMITS		
Issues	Limits	
	Within Organisation	Outside Organisation
Contribution to technological innovation through investment	Whole company and stakeholders of its internal environment, Shareholders, Employee & Commercial Network	Government, Local Community, Suppliers, Customers
Digital Inclusion	-	Local community, Local government, Government, Customers, Suppliers
Economic performance in crisis	Whole company and stakeholders of its internal environment, Shareholders, Employee & Commercial Network	Partners , Customers, Suppliers, Local community, Government
Customer experience & Value Provision	From the inside environment it concerns the Commercial Network & the employees of the company	Customers
Safe product Use	Whole company	Customers, Partners, Suppliers, Regulatory Authorities
Personal Data & Privacy communications	Whole company	Customers, Regulatory Authorities
Waste	-	Government, Local community, Regulatory Authorities, NGOs
Energy Saving	Whole company and its internal environment stakeholders Shareholders, Employee & Commercial Network	Government, Local community, Regulatory Authorities NGOs, Academic community
Energy Saving	-	Government, Local community, Regulatory Authorities NGOs, Academic community
/ M Radiation		Government, Local community, Regulatory Authorities NGOs, Academic community, Customers



We thank you for reading the present publication. If you wish more information or clarification, please conduct:

[WIND Hellas](#)

Department of Corporate Affairs
66 Kifissias Av., 15125 Maroussi
T: 210-6158574 & F: 210-6105022
E: csr@wind.gr

You can send your comments to
csr@wind.gr

or you can fill in the online form
www.wind.gr

Designed by:

**The
Newtons**
LABORATORY