

Supplementary Sustainability Information 2025

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1 About this Report

This document provides supplementary information on sustainability-related matters and is intended to be read alongside the [Sustainability Statement 2025](#), as included in the OTE Group Annual Financial Report 2025, and other publicly available disclosures. Its primary purpose is to enhance clarity and transparency on OTE Group's sustainability strategy, initiatives and performance, particularly for stakeholders (e.g. investors, ESG analysts, and external ESG rating agencies) seeking a more in-depth view of the Group's practices, progress, and strategic priorities in the field of sustainability.

The content consolidates relevant information by referencing existing publications. Additionally, it includes supplementary information and data, deemed important for offering a more comprehensive and transparent overview of OTE Group's sustainability-related activities. Where applicable, assurance levels can be verified by referring to the original documents.

This document features a SASB Index to facilitate locating information relevant to the Sustainability Accounting Standards Board (SASB) criteria. The ATHEX ESG Guide Index is also included, providing information relevant to the requirements of Euronext Athens for sustainability and ESG disclosure.

This document covers the period from January 1 to December 31, 2025, and is prepared on a consolidated basis for OTE S.A. and its subsidiaries, aligning with the financial reporting scope unless otherwise indicated.

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2 General Information

2.1 Sustainability Strategic Priorities

OTE Group aims to become Europe's leading Digital Telco elevating Greece to the forefront of digitalization in Europe, connecting customers to enjoy better lives and empowering businesses to grow, leveraging data/AI and Telekom Group global scale, while fostering an inspiring workplace where its people thrive. Sustainability is a key priority, and it is integrated into the Group's business strategy and operations.

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This section presents OTE Group's key efforts, actions and commitments around its four sustainability strategic priorities.

Sustainability Strategic Priorities

OTE Group's efforts, actions and commitments on sustainability issues focus on four strategic priorities, aligned with these of Deutsche Telekom Group:



Climate Neutrality

Reducing CO₂ emissions from own operations and across the value chain usage of Renewable Energy Sources and increasing energy efficiency.



Circular Economy

Conserving natural resources and promoting circular economy principles throughout the value chain.



Inclusion & Equal Opportunities in the workplace

The Group's corporate culture and daily practices promote the values of Diversity, Equity & Inclusion.



Digital Society for All

Decisive contribution of OTE Group to Greece's digital transformation, while ensuring equal participation in the digital world for all.

CLIMATE NEUTRALITY

Overview

Climate is changing, global temperature is increasing, and urgent global action is needed. OTE Group is committed to minimizing the negative impact of its business activities on the climate, but also to grasp the opportunities offered by digitalization to address the issue. In this context, the Group has in place a climate change strategy and participates fully towards the achievement of ambitious Telekom Group wide targets to tackle climate change, across the value chain. The climate strategy is structured along 4 main pillars: management of greenhouse gas emissions, use of renewable energy, improvement of energy efficiency and development of environmentally friendly products.

Key Commitments

OTE Group contributes to Telekom Group's climate change targets:

- Greenhouse gas neutrality in terms of own emissions (Scope 1 & 2) by 2025 (and onwards), including up to 95% reduction by 2025 with respect to 2017.
- 100% Renewable electricity (2021 onwards).
- 55% reduction of emissions across the value chain (Scope 1, 2 and 3) by 2030 with respect to 2020.
- Net Zero emissions across the value chain (Scope 1, 2 & 3) by 2040.

2025 Highlights

- Climate neutral in terms of own emissions (Scope 1 & 2) by reducing emissions by 80,000 t CO₂ eq vs. 2017 and neutralizing the remaining 2025 emissions.
- 100% renewable electricity usage in own operations.
- 16% improvement of total energy consumption per volume of data transferred compared to 2024, reaching a value of 31.1 kWh/TB.
- LEED Platinum certification of the renovated OTE Headquarters (early 2026) - the highest distinction granted by the U.S. Green Building Council's rating system LEED (Leadership in Energy and Environmental Design).
- 929 electric vehicles, accounting for 32% of OTE Group of companies' vehicles' fleet.
- 651 charging stations at the Group's buildings/facilities corporate charging network by the end of 2025.

Indicative Actions

- Reduction of emissions to the extent technically and economically feasible and emissions that cannot be reduced are neutralized by means of high-quality projects in such a way that they are permanently removed from the atmosphere.
- Use of 100% renewable electricity consumption in own operations.
- Implementation of energy conservation measures in telecom network, for example expedite migration of services from legacy equipment to new equipment, utilization of AI and ML algorithms, smart cooling automations & cooling optimization.
- Building renovation and LEED certification.
- Enabling electrification of vehicles' fleet and infrastructure.
- Reducing upstream emissions through Telekom Group supplier initiatives and downstream emissions by offering more energy-efficient devices.

Relevant Policies & Certifications

- [OTE Group's Sustainability Policy](#)
- Telekom Environmental Guideline
- [OTE Group Supplier Code of Conduct](#)
- [OTE Group Code of Human Rights](#)
- [OTE Group Integrated Management System Policy](#)
- ISO 14001, ISO 50001, ISO 22301

CIRCULAR ECONOMY

Overview

Resource efficiency and natural resource conservation are strategic priorities for the OTE Group. A holistic approach is applied, integrating the key stages of the circular economy - design, production, use, repair, reuse, and recycling - across the Group's operations and value chain. This approach covers telecommunications networks, data centers, fleet, offices, and retail stores, as well as products, services, and packaging. Through circular practices, sustainable ICT solutions, and comprehensive waste management, the Group aims to reduce resource consumption, minimize waste, and enable customers to use resources more responsibly.

Key Commitments

- Almost completely circular in technology and devices by 2030.
- 50% paper reduction (OTE, GERMANOS, CTS, COSMOTE E-Value) by 2026 vs 2020.
- Zeroplastic: retain single use plastic culture (Plastic bottles, cups, straws, food containers & single use cutleries) in major buildings in Greece.

2025 Highlights

- 100% sustainable management of ICT Waste (Waste generated from telecom & retail network, buildings and data centers).
- 100% of own branded sold and leased CPEs packaged with sustainable alternative materials.
- 25.5 t. of devices collected via the Group's recycling program
- ~9.2 mil paper sheets or 46.3 t of paper reduced vs 2020.
- >1.1m pcs of single use plastic avoided in Group's major buildings in Greece.

Indicative Actions

- Recycling program in buildings & stores.
- Trade In program in stores.
- Refurbishment of CPEs (Routers, Android Boxes and TV decoders)
- Packaging of own branded CPEs using sustainable alternative materials (recycled/FSC paper, plastic-free, waterborne coating and plant-based ink)
- Digitalization of processes reducing paper consumption.

Relevant Policies & Certifications

- [OTE Group's Sustainability Policy](#)
- Telekom Environmental Guideline
- [OTE Group Integrated Management System Policy](#)
- [OTE Group Supplier Code of Conduct](#)
- [OTE Group Code of Human Rights](#)
- ISO 14001

* Mobile devices: Smartphones & Feature phones, Tablets, Wearables, Chargers, Powerbanks, Accessories, Mobile Routers; Fixed devices: routers, repeaters and mesh devices, media receivers/ TV decoders and TV sticks, fixed line phones, smart home base stations, Laptops, Notebooks, Telephone systems, Switches, Collaboration Hardware, Servers.

INCLUSION & EQUAL OPPORTUNITIES IN THE WORKPLACE

Overview

OTE Group is committed to providing a sustainable, safe and technologically advanced working environment for its people, while fostering a corporate culture grounded in Diversity, Equity and Inclusion (DE&I). The Group ensures equal opportunities and maintains zero tolerance for discrimination across its operations. Through a structured framework of policies, procedures and controls, OTE promotes fair employment practices, equitable remuneration and inclusive workplace conditions. It actively engages with employees and their representatives, supporting social dialogue. DE&I principles are embedded across labour practices, supported by targeted initiatives, training and awareness actions, while progress is continuously monitored to ensure alignment with the Group's sustainability and human capital objectives.

Key Commitment

- 30% women at top and middle management positions (MG1-MG4) by the end of 2027.

2025 Highlights

- 39% women employees in OTE Group.
- 27% women in positions of responsibility (MG1 - MG4).
- 94% of employees covered by collective labor agreements.
- 21.3 training hours per employee.
- > 2,500 employees* completed the skill assessment through Growth Hub platform
- 1,914 employees trained through AI Academy programs
- 4,030 employees trained in Health and Safety programs

Indicative Actions

- Targeted leadership dialogues with women in middle management to identify systemic barriers to career progression.
- Development of the "Women Empowerment Roadmap" with structured initiatives for 2026.
- Implementation of the "Women Lead | Unlocking Potential" empowerment and leadership development program for middle management and young talents.
- Digitalization of Health, Safety and Wellbeing programs to enhance inclusive access for employees across all locations in Greece, complemented by on-site initiatives implemented across multiple regions.
- AI training initiatives to strengthen workforce capabilities and readiness for AI-driven transformation.

Relevant Policies & Certifications

- [OTE Group Code of Conduct](#)
- [OTE Group Code of Human Rights](#)
- [OTE Group Diversity, Equity and Inclusion Policy](#)
- [OTE Group Integrated Management System Policy](#)
- Great Place to Work certification in Greece for 2025-2026
- Top 1% Employer in 2025 by Leading Employers

* Internal & External employees

DIGITAL SOCIETY FOR ALL

Overview

OTE Group is constantly improving its footprint in society and sets the basis for sustainable development, with the power of technology. With a vision of a digital society for all, it invests in state-of-the-art networks and implements small and large ICT projects, making a significant contribution to the country's digital transformation. Moreover, by implementing targeted actions and providing relevant tools, it plays a key role in the digital inclusion of all citizens. In this way, the Group provides the appropriate means, contributes to the development of digital skills, while promoting the responsible use of technology.

Key Commitment

- Reach 3 million cumulative beneficiaries from Digital Society initiatives from 2025 to 2027.

2025 Highlights

- 1.1 mil beneficiaries from digital society initiatives.
- Successful launch of a corporate responsibility initiative, offering free high-speed connectivity to all remote* schools in Greece, benefiting ~20,000 students and ~4,000 teachers.
- 12th consecutive year of strategic investment in educational robotics competition with more than 67.000 student participations and 19,500 teachers participating in train the trainer sessions.
- >1,400 PCs have been donated through the "PC Donation Program" in response to more than 900 requests, with the initiative running continuously for 19 years.
- > € 3 billion investments plan in FTTH and 5G infrastructure by 2030.

Indicative Actions

- New Corporate Volunteering Program, engaging employees and management, supporting vulnerable groups, environmental protection, and digital awareness.
- Implementation and expansion of legacy and new initiatives to strengthen contribution to digital society KPIs.
- Target of reaching 3 mil. cumulative beneficiaries from Digital Society initiatives from 2025 to 2027.

Relevant Policies & Certifications

- [OTE Group's Sustainability Policy](#)
- [OTE Group Code of Human Rights](#)

* Remote schools in this project are provided by an official list of the Ministry of Education. They are either located at a great distance from the prefecture's headquarters, or at high altitude, or on islands and/or in border areas, or are difficult to access due to specific transport conditions and usually have a small population.

2.2 Sustainability Indices and Ratings

OTE Group's sustainability performance is regularly assessed by leading agencies and organizations. OTE is included in several national and international sustainability/ESG indices, rankings and ratings. An overview for the reporting year is presented in the table below.

Organization / Agency	Index / Rating / Ranking	Type	OTE Status	Description
FTSE Russell	FTSE4Good Index Series	Index	Included	OTE meets the requirements for inclusion in the FTSE4Good Index Series, according to the June 2025 evaluation, recognizing the implementation of significant Environmental, Social and Governance (ESG) practices. OTE has been included in the index series since 2008.
MSCI	MSCI ESG Rating	Rating	A	OTE received an "A" rating in the August 2025 MSCI ESG Ratings assessment. OTE has maintained this improved rating since 2022, reflecting strengthened management of ESG risks and practices.
Morningstar Sustainalytics	ESG Risk Rating	Rating	Low	Assessment of OTE's exposure to material ESG risks and its management of those risks relative to industry peers as of Mar 04, 2026.
ISS ESG	Corporate Rating	Rating	Prime Status	OTE maintains Prime Status, awarded to companies whose ESG rating meets or exceeds the sector-specific Prime threshold defined by ISS ESG.
CDP	Climate Change Score	Rating	B	OTE received a "B" (Management level) rating in the 2025 CDP Climate Change assessment. OTE has participated 15 years and has maintained at least a "B" score for more than 10 consecutive years.
Euronext Athens	ATHEX ESG Index	Index	Included	OTE is included in the Euronext Athens' ATHEX ESG Index, which tracks the stock market performance of listed companies demonstrating strong ESG practices.
ICAP CRIF	Synesgy ESG Assessment	Rating	A	OTE received an "A" rating in the Synesgy ESG assessment conducted by ICAP CRIF, reflecting strong ESG performance. The company is included in the relevant "Most Sustainable Companies – Prize" list.
Forbes	ESG Transparency Index	Ranking	Included	OTE was ranked at the Platinum level of the Forbes ESG Transparency Index, recognizing the Group's high level of transparency in ESG disclosures among the largest companies in Greece.

2.3 Memberships

OTE Group companies actively participate in associations and are informed about the trends and developments on Corporate Responsibility and Sustainability issues. In 2025, OTE Group companies maintained their voluntary participation, through their membership in several strategically important national and international bodies.

OTE Group is amongst other, a member of:

- [The United Nations Global Compact.](#)
- [The Hellenic Network for Corporate Social Responsibility \(CSR Hellas\).](#)
- [The Federation of Hellenic Enterprises \(SEV\) Council for Sustainable Development.](#)
- [Greek Diversity Charter.](#)
- [Transparency International Greece.](#)
- [Connect Europe.](#)

In 2025, the Group participated in a number of sustainability-related working groups, taskforces, fora and events, some of them presented below:

- Hellenic Pact for Sustainable Industry, of the CSR Hellas.
- Connect Europe Working Group for Sustainability.
- Business & Human Rights, Climate Ambition, and Target Gender Equality Accelerators by the UN Global Compact.
- Women in Business (WIB) Committee, of the American Hellenic Chamber of Commerce.
- Circular Economy Committee, of the American Hellenic Chamber of Commerce.
- Corporate Governance Committee, of the American Hellenic Chamber of Commerce.
- Conference regarding the implementation of the National Climate Law, hosted by the Greek Ministry of the Environment and Energy.

2.4 Awards

In the reporting year, OTE Group companies received numerous awards and distinctions for their sustainability/ ESG performance and actions, some of which are presented below:

- **OTE Group was distinguished at the [Hellenic Responsible Business Awards 2025](#)**, receiving three Gold awards for its ESG governance model (“ESG Communities”), its 2024 Sustainability Statement, and its long-standing STEM education initiative.
- **OTE Group was recognized as one of the [Most Sustainable Companies in Greece in 2025](#)**, for its ESG performance and approach.
- **OTE Group was included in the Financial Times’ [Europe’s Climate Leaders 2025](#) list**, due to its strong performance in reducing greenhouse gas emissions.
- **OTE Group was honored with the [Healthy Workplaces Good Practice Awards 2023–2025](#) award by the EU OSHA** recognizing its good practices in promoting healthier, safer working environments.
- **OTE Group was recognized at the [Health & Safety Awards 2025](#) as “Winner in Telecommunications” for the sixth consecutive year**, receiving one Gold, two Silver, and one Bronze award for initiatives promoting health and safety culture, emergency preparedness, musculoskeletal wellbeing, and related employee volunteering initiatives.
- **OTE Group was honored at the [Compliance Awards 2025](#)**, with two Gold Awards in “Best Governance Initiatives” and “Best Compliance Platform,” as well as two Silver Awards in “Best Compliance and Ethics Project” and “Best Governance Implementation Project”.
- **OTE Group was honored at the [HR Awards 2025](#)** with 1 Gold, 2 Silver and 3 Bronze Awards for initiatives promoting mental health & wellbeing practices, as well as introducing innovative performance management, career development, upskilling, reskilling & mentoring programs using state of the art tools & A.I. technologies.
- **OTE Group was honored at the [DevOps & Agile Awards 2025](#)** with 1 Platinum and 3 Gold Awards for best application of the agile methodology & integration in its collaboration culture.
- **COSMOTE e-Value was honored at the [European Contact Centre & Customer Service Awards](#) (ECCCSA) 2025** with 1 Gold and 1 Silver distinction for its learning & development program and overall employee experience.

3 Environment

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3.6	Other Environmental Aspects
3.6.1	Direct non-GHG emissions

OTE Group is committed to integrating sustainability across its value chain, thus contributing to addressing environmental challenges such as climate change and overconsumption of natural resources. In this context, the OTE Group's environmental strategic priorities, aligned with the ones of Telekom Group and taking into consideration the materiality analysis results, are: Climate Neutrality and Circular Economy throughout the value chain.

To achieve this, OTE Group is committed to:

- The minimization of the environmental impacts from its activities across its value chain.
- The development and provision of products and services that enable protection of the environment and increase productivity in other sectors of economic activity.
- Raising its stakeholders' awareness on acting more responsibly on all aspects of environmental protection.

To achieve its commitments, the Group acts at different levels to:

- Analyze environmental risks and opportunities.
- Monitor environmental performance in a timely and transparent manner.
- Address climate change through energy efficiency improvements and Renewable Energy Sources.
- Enable the electrification of its transportation activities, considering the maturity of the market and the technology, as well as the availability of vehicle charging infrastructure.
- Renovate buildings with a view to maximizing value by improving energy and environmental performance and addressing health, safety and wellness of employees.
- Integrate the principles of circular economy into its activities to improve resources efficiency in own operations but also on upstream (suppliers) and downstream (customers) activities.
- Recycle the majority of the waste generated.
- Increase the lifetime and decrease the footprint of the products sold/leased to customers while ensuring recycling at the end of their lifetime.
- Develop specialized ICT products and services that meet customers' needs while contributing to environmental protection.
- Ensure that the levels of electromagnetic fields of its base stations comply with the public exposure safety limits.
- Develop awareness initiatives for its stakeholders and implement environmental programs through strategic partnerships.
- Contribute to the development of public policy, autonomously or as a member of Telekom Group, either directly through the official EU or national public consultation processes or through the trade associations in which OTE

participates. The scope of its involvement is to contribute to the development of a favoring framework for the transition to a green and digital economy in line with EU Green Deal and international treaties and targets, while considering national and company specific circumstances.

- Contribute / participate, autonomously or as a member of Telekom Group, in initiatives addressing sustainability and climate change (e.g., UN Global Compact, RE100, Race to Zero campaign). Indicatively: The Climate Ambition Accelerator (CAA) capacity-building program of the UN Global Compact, which aims to support its business members on monitoring, management, and reduction of emissions through the development of knowledge and skills.

In 2025, no significant fines and non-monetary sanctions related to the environment were imposed.

The sustainability governance structure, and also the established procedures in the context of the integrated management system ensure the consistency between the OTE Group engagement with stakeholders including policy makers (e.g., in the context of public consultation processes), trade associations, etc., and its sustainability strategy and commitments. More information about the Sustainability Governance are available on the [Sustainability Statement](#).

3.1 Energy and Climate Change

This section contains information complementary to the [Sustainability Statement](#).

The governance structure, through which sustainability issues – such as climate relate – are embedded in the key business processes, is reflected in the current OTE Group Sustainability Policy. The roles of BoD, CEO and Group Executives, as well as Committees under the BoD are stated in the Sustainability Policy and/or the [Sustainability Statement](#).

3.1.1 Energy Efficiency

Improving energy efficiency is a core element of OTE Group strategy towards sustainability in operation as it allows for controlling energy consumption while data traffic increases, managing energy costs and reducing exposure to changing fuel / carbon prices.

In 2025, the energy efficiency projects implemented resulted in a stabilization of electricity consumption at 2024 levels, while fleet electrification contributed to the reduction of fleet energy consumption and emissions by about 20% and 25% respectively compared to 2024 (i.e., about 6.5 GWh and 2 kt CO₂ eq, respectively).

As a result of the measures implemented, total energy consumption per volume of data transferred improved by about 16% compared to 2024, reaching a value of 31.1 kWh/TB in 2025. The data traffic emissions intensity (scope 1 and 2 emissions, market-based that is including the effect of the GOs secured) reached a value of 1.25 kg CO₂ eq/TB (from 1.5 kg CO₂ eq/TB in 2024). Energy and GHG emissions intensities (i.e., per revenues) have also improved (by about 7% and 1.5% respectively compared to 2024).

3.1.1.1 Telecom networks

Measures to increase energy efficiency in telecom networks aim at the transition to a more energy efficient network and include, among others:

- Expedite migration of services from legacy equipment to new equipment (Legacy Telecom Power off).
- Telecom Rooms Consolidation: Reducing telecom space in buildings thus reducing cooling consumption and optimizing Power Usage Efficiency.
- Smart cooling automations & cooling optimization: For example, smart cooling automations are implemented for monitoring and constantly optimizing the energy consumption at telecom sites, deactivating air-condition units in telecom rooms with low thermal load when temperature is below a specific threshold, increasing set point, free-cooling installation, replacing air-condition units with more efficiency.
- Utilization of AI and ML algorithms that analyze and predict data and voice traffic in the network, enabling the reduction of energy consumption at base stations without affecting the quality of services.
- Power Supply Units Optimization. Replacing rectifiers with new highly efficient.

Emphasis is also given to the electricity generators, especially those covering the needs of stand-alone base stations (24-hour operation). Grid connection is ongoing, while an annual maintenance program is in place.

3.1.1.2 Data centers

Efforts to improve efficiency are on-going as this would compensate for the increasing load. Emphasis is given to the proper use and the efficient operation of the equipment installed. 100% of the electricity consumption of OTE Group data centers is covered by Renewable Energy Sources GOs and therefore their scope 2 emissions are zero (market-based).

Measures implemented address, as appropriate, IT equipment (consolidation, virtualization, rack orientation, etc.), but also sites infrastructure (UPS systems, HVAC systems, automation and BMS systems) and cabling infrastructure. With respect to the cooling infrastructure, provisions of regulations on fluorinated greenhouse gases are applied, and monitoring and maintenance programs are in place.

The Power Usage Effectiveness (PUE) metric is monitored as an indicator for energy-efficiency enhancements in OTE Group data centers. PUE is determined, according to the standard EN50600 for data centers, as the ratio of the total energy consumed by data centers over the amount of electrical energy consumed by the IT equipment. Overall efficiency is improving as the quotient decreases towards 1.0. The average PUE value for OTE Group data centers has improved in 2025 to a value of 1.8 (1.9 in 2024), while an average value of 2.0 is reported for Southern Europe.

3.1.1.3 Buildings and Stores

Renovations and day-to-day operation are carried out in such a way as to reduce energy consumption and GHG emissions. An Energy Management System certified according to ISO 50001 standard (Greece only) is in place. Energy audits are performed to detect the measures that should be taken in order to improve the energy performance of buildings or of the equipment installed.

Four OTE Group buildings have already received LEED environmental certifications (GOLD level) & one building has received Building Research Establishment Environmental Assessment Method (BREEAM) (good level). In addition, in early 2026, the renovated OTE Headquarters in Athens has been awarded the LEED Platinum certification - the highest distinction granted by the U.S. Green Building Council's globally recognized LEED (Leadership in Energy and Environmental Design) rating system.

Additionally, stores are renovated with recyclable and environmentally friendly materials and equipment to improve energy performance and reduce emissions while enhancing customers' awareness.

Some indicative measures implemented in the OTE Headquarters and other renovated buildings that have a positive energy impact are the following:

- Buildings envelope energy upgrade.
- Modernization of HVAC (Heating, Ventilation and Air Conditioning) systems improving energy efficiency.
- Energy planning for buildings and selection of energy efficient E/M equipment.
- Installation of LED lighting systems.
- Installation of smart metering devices and automation in lighting, air-conditioning, generators and other systems for better supervision and improvement of operational efficiency.
- Installation of BEM (Building Energy Management) systems in critical sites.

3.1.1.4 Road transportation

OTE Group conducts a comprehensive plan for the transformation of its fleet vehicles towards sustainability, consistent with sectoral and national adaptation plans and strategies in the areas of vehicle electrification and charging infrastructures. In this context, henceforth at every vehicle tender pursued, the procurement of zero emissions vehicles, such as specifically battery electric vehicles (BEV) being powered by electricity from renewable energy sources prevails.

By the end of 2022, more than 300 corporate vehicles have been replaced by plug-in hybrid electric vehicles (PHEV). In continuation of this transition and further reinforcing the commitment to green transportation a total of 929 BEVs were leased gradually until the end of 2025, accounting for the 32% of OTE Group vehicles' fleet.

In parallel a corporate charging network at the OTE Group's facilities is being developed, so that all vehicles can be charged. There is also provision for additional parking spaces for vehicle charging for the visitors of the Group facilities. At the end of 2025, there were 651 charging stations at the Group's buildings/facilities.

3.1.2 Renewable Energy Sources

OTE Group considers Renewable Energy Sources (RES) a key tool for the decarbonization of its operations and all available options (guarantees of origin, purchasing power agreements, self-generation) for sourcing "green" electricity are in place. In 2025, electricity consumption in all sites with full control on the selection of electricity suppliers is fully sourced from RES.

RES electricity generation (autonomous photovoltaic units in 67 base stations, small wind turbine system in 1 base station) increased to about 545 MWh in 2025. In 2025, a photovoltaic unit in OTE Headquarters building with an installed capacity of 600kWp became operational. Other buildings are also examined as possible sites for photovoltaic installations.

3.1.3 Products and Services

Information and Communications Technologies (ICT) play an important role in making the difference in the midst of the climate crisis. The digital transformation of businesses and the public sector is one of the top priorities of OTE Group, as we offer sustainable ICT products and services, enabling customers to improve their business's operation, competitiveness and prosperity, while reducing their environmental footprint. In this:

(a) Connectivity services contribute to the reduction of transportation needs, substitution of emissions-intensive products, processes, etc., greatly reducing hardware footprint and power consumption. Moreover, they enhance the development of e-commerce and e-governance, while providing businesses with safety and productivity.

(b) Services and solutions based on Internet of Things (IoT), Cloud and Big Data and artificial intelligence (AI) are developed:

- The utilization of fully customized resources without requiring investments in IT infrastructure.
- The incorporation of smart cities solutions by the municipalities (e.g., smart parking, smart lighting, smart waste & water management, air quality monitoring, smart public transportation etc.) improves and protects the urban environment. Such solutions contribute to the better use of resources as well as the reduction of their carbon footprint by adopting more environmentally friendly practices.
- The monitoring and management of energy consumption enables the rational use of energy.
- By optimizing the operations of a fleet of vehicles as well as monitoring driving behavior and performance, enterprises can achieve reduced fuel consumption, minimize emissions, and promote more efficient transportation practices.
- The use of advanced collaboration tools reduces the need for employees to commute daily, leading to less traffic congestion, lower emissions, and reduced strain on transportation infrastructure. Furthermore, companies can downsize their office spaces, leading to lower energy usage and reduced resource consumption (furniture, office supplies, etc.).
- The interconnection of systems and the better utilization of information.
- Reduced physical visits, less paperwork.

3.2 Circular Economy

This section contains information complementary to the [Sustainability Statement](#).

3.2.1 Circularity in the Supply Chain

OTE Group companies do not actually manufacture any products themselves but provide telecommunications services, as well as end devices under their brand name. Circularity in the supply chain is addressed through OTE Group Supplier Code of Conduct (as well as in the OTE Group Code of Human Rights) and by setting appropriate technical specifications for end devices and telecom equipment procured. Such specifications range from eco-design and EMF-

related requirements, restrictions on the use of hazardous substances, to repairability and sustainable packaging (details in section “Packaging of Sold devices”). **Circularity for Products and Services**

3.2.1.1 Eco Rating

Eco Rating is an industry driven initiative launched by a consortium of leading mobile telecom providers (Telekom, Orange, Telefónica - operating under the O2, Vivo and Movistar brands -, Telia Company and Vodafone). The scope is to evaluate the environmental impact of new mobile phones from production, transportation to use and final disposal, following a harmonized approach. The Eco Rating scheme provides information to customers to take more sustainable decisions on selecting a device, is expected to motivate manufacturers towards more sustainable products and to increase transparency within the industry. More information about the initiative is available [here](#).

3.2.1.2 Packaging of sold devices

OTE Group aims at reducing packaging materials and converting products packaging materials to sustainable alternatives. In this context, Telekom Group has formed packaging specifications, which are included into the relevant packaging guideline. The “sustainable” packaging specifications include- amongst others- use of recycled paper and cardboard, waterborne coating, plant-based ink and avoidance of single-use plastics. Since mid-2022, all own-branded newly launched and refurbished CPEs (routers, Android Boxes and TV decoders) are packaged according to these packaging criteria. Additionally, by the end of 2025, 97% of 3rd party smartphones sold were packaged according to the “sustainable packaging” guideline.

3.2.1.3 e-bill for customers

The Group aims at reducing its paper consumption, especially through digitalization. Paper use covers the needs of office operations, but also of communications with customers (e.g., bills for the services provided). To address the latter, customers have the option to choose to receive their bills exclusively online (e-bill). In 2025, the use of the e-bill option resulted in paper savings of 736 t. For customers who still receive their bills in hard copy, all bills are printed on FSC certified paper.

3.2.2 Circularity in Own Operations

Internally, natural resources conservation is addressed through the efficient operation and maintenance of the telecom network (see section [Energy and Climate Change](#)), as well as through initiatives such as the digitization of internal processes. In addition, the Company promotes circularity through the refurbishment of end devices, which extends the lifetime and overall utilization of equipment provided to customers, and through the development of waste management practices covering all activities nationwide.

3.2.2.1 Refuse single-use plastic

The #ZEROPLASTIC initiative, launched in 2019, with the goal to eliminate single-use plastics, such as bottles, cups, cutlery, and food containers. Zero use has been already achieved by the end of 2021 and maintained, and plastic items have been replaced with paper or biodegradable ones. The project in 2025, is implemented in 7 OTE Group buildings (hosting restaurants and coffee shops) and is addressed to approximately 6,500 employees in total. Overall, in 2025, the use of 1 million single-use plastic items was avoided. The goal of the elimination of plastic bags in the retail network has already been achieved since 2019. As a result, in 2025, the distribution of more than 1.2 million pieces of plastic bags was avoided. For 2026, OTE Group aims to retain the zero use of single use plastic culture in major buildings.

3.2.2.2 Reduce paper use

OTE Group aims for a 50% decrease of paper use by 2026 with respect to 2020 (OTE, CTS, COSMOTE E-Value, GERMANOS). Paper consumption of the companies- within the scope of the target- decreased by 42%, with respect to 2020. In the context of the broader digital transformation program, in 2025, the use of OTE Group IT applications in Greece, resulted in 747t paper savings (including the effect of e-bill). Paper consumption at OTE Group level amounted to 54.7t or 6.2 kg per employee. Alongside initiatives to reduce paper consumption, the Company lowers the environmental impact of printing by using refilled cartridges, which account for 64% of total cartridge consumption.

3.2.2.3 Packaging materials

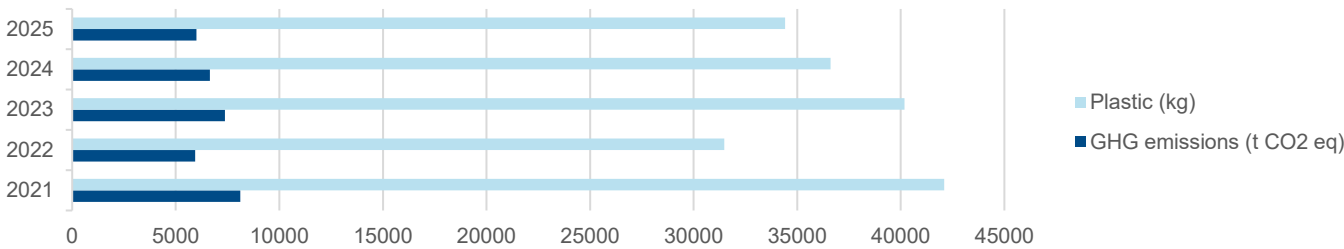
Paper, cardboard and plastic are the main packaging materials used, with plastic accounting for about 10.8% of total consumption that reached 519 t, including all logistic processes. Initiatives are in place to reduce the use of packaging

materials, while ensuring the safe transportation of products and moving towards sustainable alternatives to cover the relevant needs.

3.2.2.4 Repair end devices

Since 2012, OTE Group operates an extensive take back / refurbishment & recycling program for CPEs aiming at giving, if possible, all terminal equipment (xDSL, Routers, Optical Network Terminals, Android TV Box and STB Decoders), a second life and at ensuring the recycling of those who are beyond repair/use. In case of disconnections, technical upgrades and equipment faults, the relevant leased equipment is collected from the clients’ premises or from the stores and taken to the main warehouse. The CPEs are thoroughly tested for quality and function and packed along with new or other refurbished components, to be distributed to customers as functional refurbished CPEs. Non-functional CPEs are being delivered for recycling to the national Collective System for WEEE. OTE Group operates an in-house refurbishment center and does not subcontract the refurbishment/ repair process to a third party. In 2025, about 265,000 end devices were refurbished, while about 30,000 devices were recycled. Avoided GHG emissions are estimated at 6 kt CO2 eq, while avoided plastic use is about 34.4 t.

Avoided GHG emissions and plastic use through the refurbishment of end-devices



3.2.2.5 Reuse and Recycle (Waste Management)

Solid waste generated by the OTE Group activities derive from: the development, maintenance and operation of the telecom networks and equipment, the offices and stores operation, the management of the corporate vehicle fleet, and the real estate activities (construction / renovation of buildings). In addition, products sold / leased at the end of their lifecycle represent another, indirect, source of solid waste (downstream).

Aiming at the effective management of waste generated, an extensive network for its collection, monitoring, storage and management/recycling has been developed, covering all activities nationwide. In this context, the Group companies collaborate with certified / authorized companies to ensure (a) the proper management of waste generated (including cross-border transportation) and (b) the recovery of the materials contained (e.g., copper, iron and steel, etc.) and (c) the conservation of natural resources. Information on the methods applied is provided by the above-mentioned companies.

A take-back scheme is in operation in the Group retail network (for phones and accessories, tablets, household batteries and ink cartridges) to facilitate the recycling of devices sold at the end of their end-of-life phase. In 2025, about 25.5 t of devices were collected and forwarded for recycling.

An internal recycling program in buildings is in place (Greece). The program is based on the principle of “sorting-at-source” with centralized waste collection and management. Streams cover paper, packaging materials (PET plastic, glass, other), ink cartridges, phones, other small electric and electronic appliances, and batteries. In 2025, the program is implemented in 24 office buildings nationwide, serving approximately 8,400 employees. Recycled quantities include 196 t of paper, 0,6 t of light bulbs and 11.1 t of packaging materials.

3.3 Electromagnetic Fields

This section contains information complementary to the [Sustainability Statement](#).

OTE supports the “Pedion24” program of continuous electromagnetic fields measurements, the results of which are readily accessible to the public at the program’s website. In 2025, 252 measurement stations were in operation (one additional measurement station was added in 2025), while approximately 130 mil. measurements have been conducted since the beginning of the program. In addition, OTE Group operates the OTE Environmental

Electromagnetic Fields Measurement Laboratory (accredited according to EN ISO / IEC 17025). Since 2018, the scope of the laboratory's accreditation expanded to cover measurements regarding 5G services.

In 2025, in addition to the measurements made in the context of the "Pedion24" program and by the OTE laboratory (10 measurements), 17 more measurements were conducted by independent institutions (Universities, Greek Atomic Energy Commission) at OTE's request. Public exposure safety limits were not found to be exceeded in points of free public access, while the measurements made by the Greek Atomic Energy Commission (to a sample of at least 20% of the base stations operating in urban areas each year) led to the same result.

To improve outreach, an email address for questions regarding electromagnetic fields information is available (emfinfo@cosmote.gr).

3.4 Water

Telecommunications operations have no specific need for water use and water consumption has not been identified as a material issue for the sustainable development of the Group. Water consumption concerns employees' hygiene, plant irrigation, HVAC needs and office / stores cleaning. Water consumed is acquired solely from public water companies which are responsible, not only for water supply, but also for the sustainable uptake of water from the available water resource systems. In this context, it is considered that (a) water sources are not significantly affected by OTE Group activities and (b) water withdrawal and water discharge (wastewater) are approximated by water consumption. In addition, emissions to water (in terms of effluents like phosphates, nitrates, pesticides, etc.) are not relevant.

- Water related issues are addressed in the context of the ISO 14001 Environmental Management System. Given that water stress is considered a significant issue for Greece, emphasis is given in the continuous monitoring of the issue (e.g., in terms of potential future risks, restrictions in water use, water consumption). To this end, the output of the climate scenarios with respect to the drought stress may provide useful input.
- Water consumption, in 2025, amounted to 90,843 m³ (about 10.4 m³ per employee).
- Measures are being implemented to improve the monitoring of water consumption and data quality, providing better insight into how much water is used and where. Currently, hydrometers have been installed in selected buildings with significant air conditioning loads to better track this specific area of consumption. Additionally, unused water supply points are being deactivated, in the context of space consolidation, to prevent unintended water use or potential leaks.
- In renovation of buildings, especially those under the LEED scheme, emphasis is given in introducing appropriate water conservation practices ranging from low-rate water supply to rainwater management, where applicable.

Wastewater generated from OTE Group operations refers to domestic wastewater, which is directed to the available wastewater networks and is then treated according to area-specific processes in the municipal wastewater facilities. In Greece, there are three cases of main buildings and warehouses where the companies operate own wastewater treatment plants that handle 3,477 m³ of wastewater, of which about 33% is reused for irrigation purposes. No planned or unplanned water discharges to the environment, as well as no significant spills occurred during 2025.

3.5 Biodiversity

OTE Group is aware of the high value of biodiversity and recognizes the close relationship between biodiversity, sustainable development and human well-being. Increasing land use by human activities is one of the causes of biodiversity loss. Land use requirements for telecom companies are lower compared to other economic activities. At the same time, the provision of high-quality services everywhere and at any time necessitates the operation of a geographically extensive network of telecommunication installations (base stations and wireless communication stations) including, inevitably, in NATURA 2000 sites, RAMSAR and other protected areas. In addition, activities across the supply chain may have an impact on biodiversity.

After a comprehensive review of the Group's business activities and locations, biodiversity has been assessed as non-material. Biodiversity related issues are addressed in the context of the ISO 14001 Environmental Management System. OTE Group addresses biodiversity preservation across its value chain, to the extent possible, as OTE is not a product manufacturer, through:

- The OTE Group Supplier Code of Conduct, according to which the suppliers shall take a precautionary approach towards environmental challenges, including biodiversity. The Code also sets the framework for social, environmental and compliance audits.
- The design, installation and operation of telecom installations in compliance with the approved environmental terms of operation that aim to minimize any associated potential environmental impact.
- The climate change strategy in place, as climate change has a high impact on ecosystems and biodiversity.
- The circularity strategy, in the context of which in case the lifetime of end devices is extended, the use of natural resources is reduced, and valuable materials are returning back to the market through recycling.
- The development of ICT solutions that can have a positive impact on biodiversity preservation.
- Partnerships with social enterprises to address specific problems (e.g., working with ENALEIA for the removal of plastic pollution from the marine environment of Greece – COSMOTE BLUE initiative).

In 2025, there were 1,051 OTE base stations in Greece, installed in 198 Natura sites, covering areas of 45.9 hectares, respectively. More information on the protected areas (e.g. location, maps, area, protected species, etc.) is available on the relevant website of the European Commission (NATURA 2000 sites) and the RAMSAR convention.

All installations operating in NATURA sites are fully licensed by regulatory authorities (Hellenic Telecommunications and Posts Committee in Greece). All buildings / installations / telecom lines that are currently in use and / or installed by OTE Group are also registered, while relevant information is available.

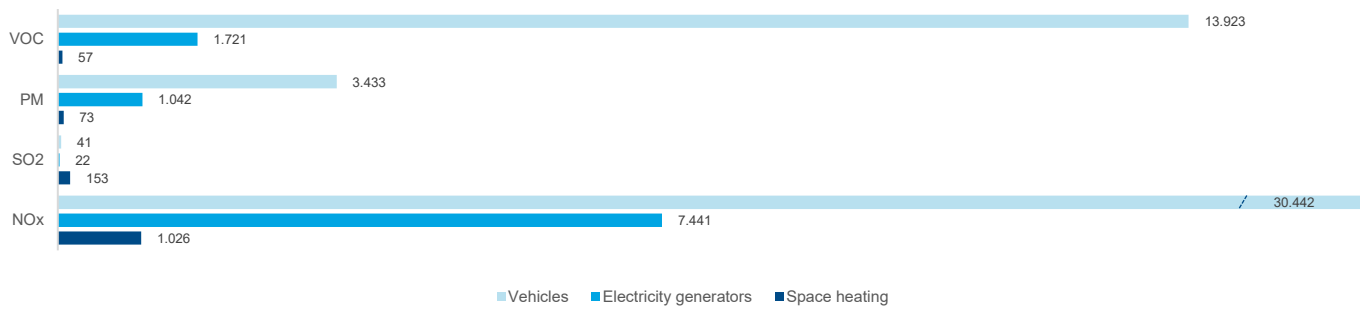
With respect to installations in or adjacent to protected areas it should be noted that:

- Potential impacts are mainly related to the operation of installations in isolated areas necessary for the reliable provision of telecommunication services (energy consumption, EMF emissions) and infrastructure works for upgrading / maintaining telecommunication network (waste generation).
- All potential impacts are addressed in the Environmental Impact Assessment studies carried out and submitted for approval to the designated authorities as foreseen by national legislation in force. In these studies, special reference is made to protected areas (NATURA, SPA, RAMSAR, CORINE, IBA) and areas of high biodiversity value that are near to the activities of OTE Group companies. The contents of these studies and the approval process, that includes a public consultation phase, are specified in the relevant legislative acts. These studies, on the basis of current scientific knowledge, conclude that impacts on biodiversity are not material, and therefore there are no protected and / or restored habitat areas that are affected by the operation of OTE Group.
- In the case of smaller base stations installed in protected areas, an Environmental Impact Assessment is not required. In these cases, a Statement of Standard Environmental Commitments is submitted to the Hellenic Telecommunications & Post Commission accompanied by a Special Environmental Assessment.
- The majority of the installations are small, without permanent personnel and with limited transportation activities at the operational stage.

3.6 Other Environmental Aspects

3.6.1 Direct non-GHG emissions

Emissions of typical air pollutants (NO_x, SO₂, PM₁₀ and VOCs) are mainly related to road transportation and the use of electricity generators to support the operation of the telecom network. Emissions of Persistent Organic Pollutants (POP) are of minor importance as transformers and capacitors which could have been a significant source of PCB (Polychlorinated biphenyls) emissions due to leakage, have been decommissioned, disposed of and replaced by new ones that do not contain PCB, in line with the provisions of legislation in force.

Non-GHG direct emissions (kg CO2e)

4 Society

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4.1 Labour and Decent Work

This section contains information complementary to the [Sustainability Statement](#).

The majority of OTE Group employees are employed with a full-time, indefinite duration contract. There are no temporary contracts and very limited number of definite duration, mainly referring to probation periods that in case of successful completion are converted to indefinite. In case of temporary needs the company assigns services to third companies with service contracts and the third companies utilize their own workforce.

Individual self-employed persons are very limited and they are mainly involved in network technology projects. They account for less than 5% of the costs of the entire workforce. Freelancers do not have an employment relationship with the company and are not subject to the same working conditions that benefit the majority of the workforce.

4.1.1 Fostering a Respectful and Inclusive Workplace

For OTE Group, diversity, equity and inclusion constitute a management concept and an integral part of our corporate culture. The [OTE Group Diversity, Equity & Inclusion Policy](#) affirms diversity across demographic and ability dimensions, ensures equitable access to opportunities, and embeds inclusion as a fundamental operational principle. The [Diversity, Equity & Inclusion Policy](#) aligns with the [OTE Group Code of Conduct](#) and the [Code of Human Rights](#), and incorporates international norms (UNGC, ILO). Leadership accountability and zero-tolerance for discrimination or harassment are integral to its implementation.

As part of promoting a safe and dignified working environment, OTE Group implements the [Policy for the Prevention and Combating of Violence and Harassment at Work](#), in accordance with Law 4808/2021. Information and awareness-raising activities are designed and implemented, such as the informative webinar on tackling violence and harassment, with the participation of employees from across the Group.

In addition, OTE Group aims to strengthen knowledge and common understanding of DEI principles through the e-Learning program "Diversity, Equity & Inclusion Baseline", helping its people commit to a more inclusive and empowering workplace. Additionally, the Group continues to enhance accessibility across physical and digital infrastructure. Measures include the adaptation of workplaces, provision of assistive technologies, and ongoing upgrades to IT systems and applications to improve internal and external accessibility.

The Group applies structured measures to ensure equal participation and work-life balance for employees with disabilities and employees with health-related constraints. These include:

- Special leave entitlements (e.g., 12 days for parents of children with disabilities; additional annual leave; expanded sick leave).
- Reduced working hours without salary reduction.
- Prioritized remote-work arrangements.
- Financial support through the Solidarity Fund for families of children with disabilities.
- Employment levels above the statutory minimum, maintaining representation at ~2 percentage points above legal thresholds.
- Dedicated legal advisory support for disability-related pension rights in voluntary exit schemes.

These enhancements reinforce equity and financial security and indirectly support under-represented groups, including people with disabilities, through flexible benefit allocation and strengthened social protection.

As part of its wider social contribution strategy, the Group maintains collaborations with organizations supporting vulnerable social groups, including persons and children with disabilities, as referred in the section "[Social Contribution](#)" and the corporate [site](#).

DEI compliance is ensured through the [OTE Group Compliance Management System](#), human rights governance structures, relevant Codes and Policies, and formal grievance mechanisms. The DEI Policy sets expectations for leadership role-modelling and behavior aligned with respect, integrity, and non-discrimination.

4.1.2 Non-discriminatory Compensation

OTE Group does not support any form of gender discrimination in compensation policies.

Employees' salary is determined by the level of the position they hold, their level of education or role and the years of employment. The minimum (basic) salary is adjusted according to the salary category the employee belongs to.

Indicatively, the minimum (basic) salary for OTE employees is set by the applicable collective labour agreements, from 01/04/2023 until 31/12/2025, at €850 up to €1,100, depending on the business role/position they hold and irrespective of gender. Throughout this period, employees' salaries remain, in all cases, higher than the national minimum wage in Greece, which was set at €780 at the time of the agreement, increased to €830 in April 2024, then increased to €880 in April 2025, and further increased to €920 as of 01/04/2026. Furthermore, a new Collective Labour Agreement, effective for the period 2026–2028, was signed in 2025, establishing the minimum basic salary for OTE employees at €1,000 - €1,150.

OTE Group ensures that performance-based remuneration is provided to a broader segment of the workforce. Specifically, both management and non-management employees are eligible for variable performance-based pay components, such as annual bonuses. Eligibility is determined based on role, contribution to business objectives, and alignment with performance metrics at both individual and team levels.

4.1.3 Employee Benefits

OTE Group considers its employees the most important asset and a key factor for the company's prosperity, sustainability, and growth. Therefore, creating and providing a modern and sustainable working environment of high standards for its people is a top priority for the Group. In this context, the company provides them with a wide range of benefits, aiming to significantly upgrade their quality of life, while contributing to balancing their personal and professional needs and strengthening their family planning. At the same time, an appealing benefits scheme serves as a safe and efficient way to promote employees' job satisfaction and increase their loyalty to the company.

The existing benefits schemes vary per company within the OTE Group, to better fit the different employees' profiles and needs. They consist of the core benefits, available to all employees, such as medical and life insurance, mobile and fixed phone services, and optional or status benefits, based on the family profile and the business role of each employee. The new Collective Labour Agreement at OTE (for the period 2026-2028) brings notable improvements to key benefits, including meal vouchers and the pension plan.

In the Collective Labour Agreement of OTE in force from 01/04/2023 until 31/12/2025, as well as in the Collective Labour Agreements of CTS and GERMANOS signed on December of 2023, it is stated that in case of serious diseases, the employees are entitled to 100 working days of paid sick leave, instead of 30 days set by the Greek law.

The Group provides parental leave for childcare, which is above the minimum leave set by law. More specifically, OTE, COSMOTE PAYMENTS and OTE Estate offer an additional 26 weeks of paid leave, while CTS and GERMANOS offer an additional 13 weeks of paid leave. Parental leave is provided to working mothers or fathers, immediately after the end of maternity leave. Parental leave retention rate in OTE Group is more than 90%.

OTE, CTS and GERMANOS employees who have children with a disability of 67% or higher receive additional days from those provided by the law (a total of 12 days instead of 4), for monitoring the performance of children. The days are granted to both mothers and fathers.

Following government guidelines, OTE Group provides parents of young children with the choice to work from home for some days of the week, if they ask for it and their role allows it.

Moreover, the Group provides additional benefits, such as the following:

- Allowance for childcare and nursery costs.
- Wedding income support (e.g., wedding gift).
- Financial support for employees.
- Financial rewards for employees who excel in institutions of higher education or foreign language degree.
- Financial rewards for employees' children, who excel in secondary and higher education.
- Special support for large families.
- Christmas gifts to employees' children.
- Preferential prices for employees and their family members for fertility services and for egg-freezing.

4.1.4 Performance Management

Performance management is a fundamental tool, not only for identifying the work output and contribution of employees and executives, but also for initiating and supporting the creation of solid individual development plans. In 2025, OTE Group embraced WEGROW, a recently introduced performance and development philosophy with the motto "Shape your future, elevate your performance". Its aim is to enhance employees' responsibility for their personal growth and create conditions for high-performing teams.

WEGROW is based on regular dialogues and feedback between managers and employees, fostering a culture of open dialogue and honest exchange of ideas. Key elements of the process include goal setting, dialogue, feedback, and regular meetings to monitor goals and development, all supported by a dedicated digital platform.

Employees moving into positions of managerial responsibility for the first time, undergo dedicated training on how to evaluate their teams and create individual development plans for their people. 32 newly appointed managers in 2025, attended the relevant Performance Management training.

100% of employees at OTE Group companies received Performance Evaluation in 2025.

The performance cycle includes an annual appraisal, with an additional mid-year review for employees rated in the lowest performance rating, aimed at improving performance during the year.

4.1.5 Talent Acquisition

Internal recruitment process: The recruitment process for internal positions involves the internal announcement of job openings, the application through a dedicated internal career page, a subsequent interview, and final selection. It is supplemented by an assessment exam, which, if required, takes place in collaboration with an external consultant.

External recruitment process: The recruitment process for non-executive positions involves interviews and corresponding assessment activities. External candidates can apply to job postings on the company's corporate page on LinkedIn and via its career site. OTE Group also participates in several career events.

Internships: In a comprehensive and modern working environment, opportunities are offered to students, such as interns, in order to apply the knowledge that they have gained from their academic course in a working environment. Cooperation with educational institutions strengthens the Group's relationship with young people, facilitating their transition to the requirements of the labour market. In 2025, 356 university and technical school students, out of which around 30% young women, completed an internship at OTE Group companies in Greece.

4.1.6 Employment Security / Responsible Workforce Restructuring

OTE Group in Greece complies with the provisions of Presidential Decree 178/2002, which stipulates that in every case of merger or transfer of a business, the transferor is obliged to inform the representatives of its employees about the timing, the reason, the consequences, and the measures related to the transfer, in a timely manner, before the transfer takes place.

In 2025, voluntary exit programs (VES) with financial incentives were adopted in a number of OTE Group companies in Greece, aiming at the enhanced rationalization of human resources and respective labour costs. In total, 305 of OTE Group employees applied for the scheme and accepted the incentives offered, which were designed in a socially responsible manner. VES incentives include financial packages that exceed legal indemnity and other offerings, such as outplacement services and medical coverage. In cases of major restructurings VES packages are available as an option to all impacted employees.

4.1.7 Employee Training and Skills Development

A core part of OTE Group's strategy is to empower its employees and support them to develop the necessary skills to succeed within the Group, grow personally and professionally. In this context, it offers a plethora of online and in-class upskilling and reskilling training courses, available for all employees.

OTE Group considers learning as a culture and constantly encourages its people to take advantage of every development opportunity that is offered to them.

All the upskilling and reskilling programs were designed and implemented periodically, throughout the year, in accordance with the needs of the Group. The ultimate goal of the trainings was to build strong capabilities across the organization.

In 2025, OTE Group provided its employees the opportunity to participate in a range of training programs, such as:

- Dynamic Training Academies have been established to support key functions (Front-line and Network Technology), as well as major operational transformations (e.g., Agile ways of working). As part of this initiative, the AI Academy was launched in 2025, through which 2,500 employees completed training courses within the year. A wide range of individual programs in numerous specialties, for personal development.
- Advanced experience in digital personal learning and development, using modern methods and engagement tools.
- Culture Change and Team Bonding programs, where the company empowers the teams and brings the employees together to celebrate their achievements.
- The "Coach for Growth" Leadership Training Program, which helps OTE Group leaders build a growth mindset and empower their teams to improve performance.

Growth Hub is an innovative, skills-driven platform launched in 2025, providing tools, knowledge, and guidance to support employee development. Through personalized learning, career resources, networking, and mentoring opportunities, it enables employees to grow and enhance their capabilities. In 2025, 1,914 employees completed the skills assessment on the platform.

4.1.8 Employee Engagement

Twice a year, in May and November, OTE Group invites its employees to share feedback on their work experience, aiming to identify areas for improvement and enhance daily working life. Responses to key topics - such as Mood, Employer Attractiveness, Career Development, and Customer Centricity - are used to calculate the Employee Experience Score, a core indicator of overall employee satisfaction.

In 2025, the Employee Experience Score remained at a consistent high level, closely aligned with Telekom's benchmark of 82%, reflecting the Group's strong focus on fostering a positive workplace culture. The November 2025 Employee Survey recorded an Engagement Score of 82%, reinforcing the upward trend in employee sentiment. Participation was exceptionally high at 90%, with more than 8,700 employees sharing their views. These strong results demonstrate a high level of engagement and a shared commitment among employees to actively contribute to the Group's ongoing improvement and success.

Inspiration, purpose, learning, trust culture, work-life balance, customer centricity and personal growth are some of the key survey topics. Moreover, the employee surveys include sustainability-related topics, with gratifying results. More specifically, 92% of the participants stated that they agree with OTE Group's environmental and social commitment, while a total of 92% believe that OTE Group acts responsibly towards the environment and society. 87% of the participants believe that all employees are offered the same opportunities for hiring and career development within the Group, and 91% believe that OTE Group provides a safe and supportive work environment for all.

The Employee Survey is a dynamic and reliable diagnostic tool, and it evolves to reflect elements of the strategy and the objectives of OTE Group, as well as trends that dominate the external environment. The key survey topics mentioned above, not only mirror the Group's overarching vision, but also provide valuable insights, guiding in this way, future changes in the Group's working environment.

All results are presented and discussed within the Board of Directors, the Management Meeting and individual teams, and an action plan is developed, along with corrective measures depending on the survey findings.

4.1.9 Health & Safety

For OTE Group, ensuring employees' health, safety and overall well-being remains a key priority. In this direction, integrated practices and actions related to those issues are implemented every year and are considered vital for the successful and sustainable future of the Group. This integration, along with the monitoring of daily issues, has a direct impact on employees' satisfaction, well-being, work quality and corporate culture. OTE Group acknowledges the positive impact that health and safety culture can have, not only on the Group's operations, but also on its employees, customers, contractors, suppliers and business associates, as well as on society. With the promotion of safe working conditions and the implementation of health and wellness programs, the Group can eliminate fatalities and injuries, while supporting the mental health and well-being of its employees, improving quality of life and respecting human rights. Unaddressed work-related incidents, injuries and risks could potentially increase negative impact, threatening employee safety, the company's reputation and its compliance with relevant regulations.

Within this context, OTE Group ensures that all operational units apply the required procedures for promoting health and safety in the workplace, in line with the [Group's Integrated Management System \(IMS\)](#). Compliance with applicable legislation is a core priority, while OTE, CTS, GERMANOS and COSMOTE E-VALUE are certified with ISO 45001.

In 2025, OTE Group's Health & Safety initiatives were structured across four main categories:

Health & Wellbeing Promotion Initiatives

- Voluntary blood & bone marrow donation campaigns resulting in 2,348 vials of blood and 65 bone marrow specimens tested.
- More than 440 personalized nutritional consultations (digital or face to face) and more than 2,350 relaxing massage sessions during Wellness Days in 7 premises.
- More than 10,500 participations in athletic group activities, including 14 teams of sports: football, basket, running, outdoor & functional training, yoga, pilates, power dance, B2Run Athens, Athens Authentic Marathon, Dirfis trail run, beach volley tournament and other outdoor exercise events.

Health Awareness and Prevention

- 43 webinars given with more than 3,350 attendees on numerous health related areas i.e. mental health, stress management and psychological resilience, work-life balance and self-care practices, childhood obesity prevention, CPR emergency assistance, recognizing and addressing abuse in the workplace.

Training on Safety Issues

- 10,550 hours of safety trainings across operational units, covering "working at heights".

In 2025, although the total accidents decreased compared to last year, the accident severity rate increased. This rise was driven by a limited number of incidents of increased severity within a specific subsidiary (CTS), reflecting the inherently high-risk nature of its operations (e.g. working at heights). In response, targeted actions are implemented, such as strengthening practical training programs and utilizing modern methods (e.g., Virtual Reality training), with the aim of reducing risk and preventing the recurrence of similar incidents.

4.1.10 Supplementary HR Data

Unless otherwise stated, all metrics are consolidated at OTE Group level, based on the internal active workforce and include companies with a minimum of one full-time equivalent (FTE).

Following its disposal, Telekom Romania Mobile Communications (TKRM) is excluded from all metrics.

Employee Training metrics exclude COSMOTE TV, COSMOTE Global Solutions, OTE Insurance, and OTE PLC.

The rate of employee turnover is calculated by dividing the number of departures during the year by the headcount yearly average.

Fatal work accidents do not contain incidents from strictly natural causes.

Accident frequency rate: (Total number of recordable work-related injuries (including fatalities) / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees. The data do not include minor (first-aid level) injuries.

Accident severity rate: (Total number of lost calendar days / Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees. Lost day count begins on the day of the injury or the next day, depending on the time of the day.

Lost Time Injury Frequency Rate (LTIFR): the number of lost-time injuries per million hours worked, calculated as (total number of lost-time injuries / total hours worked) x 1,000,000.

PERFORMANCE INDICATORS ON HUMAN RESOURCES	UNIT	2025	2024
Management Level (HC Average)			
Non-managerial positions	Number (%)	8,098 (91%)	8,499 (90.7%)
Male	Number (%)	4,905 (61%)	5,166 (60.8%)
Female	Number (%)	3,193 (39%)	3,332 (39.2%)
Supervisors, Team Leaders	Number (%)	156 (2%)	169 (1.8%)
Male	Number (%)	75 (48%)	83 (49.1%)
Female	Number (%)	81 (52%)	86 (50.9%)
Middle management	Number (%)	583 (7%)	616 (6.6%)
Male	Number (%)	425 (73%)	446 (72.5%)
Female	Number (%)	158 (27%)	170 (27.5%)
Top management	Number (%)	72 (1%)	85 (0.9%)
Male	Number (%)	56 (78%)	64 (75.4%)
Female	Number (%)	16 (22%)	21 (24.6%)
Employees covered by enterprise collective labor agreements (FTE)	(%)	94%	94%
Number of employees with disabilities (HC)	(%)	2%	2%
Management positions in revenue-generating functions	Number	704	717
Male	Number (%)	490 (70%)	503 (70.2%)
Female	Number (%)	214 (30%)	214 (29.8%)
STEM-related positions	Number	4,393	4,575
Male	Number (%)	3,705 (84%)	3,871 (84.6%)
Female	Number (%)	688 (16%)	704 (15.4%)
Recruitment	Number	228	280
External recruitment	Number (%)	137 (60%)	193 (68.9%)
Gender			
Male	Number (%)	105 (77%)	112 (58.0%)
Female	Number (%)	32 (23%)	81 (42.0%)

PERFORMANCE INDICATORS ON HUMAN RESOURCES	UNIT	2025	2024
Age			
Under 30 years	Number (%)	62 (45%)	54 (28.0%)
Between 30 and 50 years	Number (%)	73 (53%)	138 (71.5%)
Over 50 years	Number (%)	2 (1%)	1 (0.5%)
Management Level			
Non-managerial positions	Number (%)	133 (97%)	190 (98.4%)
Supervisors, Team Leaders	Number (%)	1 (1%)	1 (0.5%)
Middle management	Number (%)	2 (1%)	1 (0.5%)
Top management	Number (%)	1 (1%)	1 (0.5%)
Internal recruitment	Number (%)	91 (40%)	87 (31.1%)
Gender			
Male	Number (%)	39 (43%)	50 (57.5%)
Female	Number (%)	52 (57%)	37 (42.5%)
Age			
Under 30 years	Number (%)	1 (1%)	1 (1.1%)
Between 30 and 50 years	Number (%)	74 (81%)	78 (89.7%)
Over 50 years	Number (%)	16 (18%)	8 (9.2%)
Management Level			
Non-managerial positions	Number (%)	82 (90%)	86 (98.9%)
Supervisors, Team Leaders	Number (%)	0 (0%)	1 (1.1%)
Middle management	Number (%)	7 (8%)	0 (0.0%)
Top management	Number (%)	2 (2%)	0 (0.0%)
Promotions	Number	382	48
Male	Number (%)	229 (60%)	34 (70.8%)
Female	Number (%)	153 (40%)	14 (29.2%)
Departures	Number	624 (7.2%)	582 (6.2%)
Voluntary departures (incl. voluntary exit programs)	Number (%)	571 (6.6%)	524 (5.6%)
Gender			
Male	Number (%)	362 (63%)	361 (68.9%)
Female	Number (%)	209 (37%)	163 (31.1%)
Age			
Under 30 years	Number (%)	18 (3%)	21 (4%)
Between 30 and 50 years	Number (%)	300 (53%)	285 (54.4%)
Over 50 years	Number (%)	253 (44%)	218 (41.6%)
Involuntary departures (incl. fixed-term contracts ended, dismissals, retirements, deaths)	Number (%)	53 (0.6%)	58 (0.6%)
Health and Safety			
Fatalities (number of employees)	Number	0	0
Recordable work-related injuries (incl. fatalities)	Number	37	40
Total working days lost due to accidents	Number	1,010	589
Accident frequency rate	Number	0.4	0.4
Accident severity rate	Number	16.18	8.18
LTIFR (Lost Time Injury Frequency Rate)	Number	2.07	1.97

PERFORMANCE INDICATORS ON HUMAN RESOURCES	UNIT	2025	2024
Employee training			
Total participations	Number	17,528	17,371
Male	Number (%)	9,506 (54%)	9,106 (52.4%)
Female	Number (%)	8,022 (46%)	8,265 (47.6%)
Total employees who participated in training	Number (%)	5,965 (67%)	6,021 (64.7%)
Gender			
Male	Number (%)	3,574 (60%)	3,739.0 (62.1%)
Female	Number (%)	2,391 (40%)	2,282.0 (37.9%)
Total training hours	Number	188,482	187,639*
Gender			
Male	Number (%)	111,393 (59%)	113,689 (61%)
Female	Number (%)	77,089 (41%)	73,950 (39%)
Age			
Under 30 years	Number (%)	7,034 (4%)	3,908 (2%)
Between 30 and 50 years	Number (%)	139,395 (74%)	143,894 (77%)
Over 50 years	Number (%)	40,543 (22%)	39,836 (21%)
Management Level			
Non-managerial positions	Number (%)	157,118 (83%)	157,299 (84%)
Supervisors, Team Leaders	Number (%)	1,719 (1%)	6,100 (3%)
Middle management	Number (%)	25,487 (14%)	20,184(11%)
Top management	Number (%)	2,683 (1%)	1,925(1%)
Training days per employee (HC average)	Number	2.66	2.52
Training hours per employee (HC average)	Number	21.29	20.15
Gender			
Male	Number	20.6	19.9
Female	Number	22.6	20.7
Age			
Under 30 years	Number	52.9	32.4
Between 30 and 50 years	Number	21.9	21.1
Over 50 years	Number	17.0	16.5
Management Level			
Non-managerial positions	Number	19.4	18.5
Supervisors, Team Leaders	Number	0.4	1.2
Middle management	Number	8.0	6.1
Top management	Number	17.3	11.4
Total employee training expenditure (€)	Number	3,548,130	4,133,834
Average amount spent per FTE on training and development (€)	Number	1,028	1,140.8
Strikes			
Number of strikes	Number	4	4
Duration of the strikes (in days)	Number	4	4

*2024 training hours data updated due to recalculation to provide a more accurate and comparable depiction of related metrics in comparison to 2025. The same applies to all 2024 metrics regarding employee training affected by training hours.

4.2 Consumers and End-Users

4.2.1 Responsible Marketing

OTE Group conforms to the applicable laws and regulations regarding communication and advertising. All promotional materials are reviewed prior to their release to ensure that they abide by applicable laws and are suitable, impartial, genuine and that they respect diversity.

In Greece, the Group's companies adhere to the Hellenic Code of Advertising and Communication Practice, as established by the Advertising Self-Regulation Council (SEE). In 2025, the SEE issued only one decision, with which the OTE Group fully complied with in accordance with the Code.

4.2.2 Transparency and provision of information to customers and end users

In line with the current regulatory framework, OTE Group is committed to handling pricing matters in a clear, simple, and transparent manner. This includes disclosing billing information within the legally defined timeframes. Pricing details are readily available through company applications, websites, customer service centers, and informational brochures.

Customers are informed of billing details and any unexpected changes directly through their accounts' bills. To address spending control, OTE Group has developed mobile apps for bills and account management and introduced cost control services. Additional tools, such as the Multimedia Information Service (MIS) Billing Update and COSMOTE Mobile Split Bill, help prevent overcharging. In addition, the Group offers a user-friendly and technologically advanced e-bill service, giving customers a more comprehensive and accessible view of their charges.

All service contracts and general terms are provided in printed form or sent via e-mail. Both existing and prospective customers can access the Terms of Use and information about their rights through the Group's official websites.

Safety information and installation instructions regarding own branded products are available on the Group's Greek websites. In 2025, no penalties or warnings were issued to OTE regarding product safety or regulatory compliance.

4.2.3 Digital Customer Experience

Besides direct communication, the physical retail network, the social media channels and customer care service channels, the COSMOTE TELEKOM App and WHAT'S UP App digital self-service apps are available for customers. The apps are the primary channels for service transactions, used by 70% of the customer base and handling requests such as bill payments, data top-ups, plan updates and amongst others. In 2025, 86% of customers received e-bills, and 42% of total bill payments were performed via the COSMOTE TELEKOM application and website.

OTE Group further enhanced the digital customer experience in 2025, through the integration of Magenta Moments and Magenta AI within the COSMOTE TELEKOM App and WHAT'S UP App. Magenta Moments operates as a comprehensive rewards program, offering personalized deals, gifts and unique experiences through a broad partner ecosystem, strengthening user engagement and interaction with digital channels. At the same time, Magenta AI was introduced as an intelligent digital assistant, leveraging artificial intelligence to provide instant support, guidance and personalized recommendations in real time, contributing to a simpler, faster and more personalized service experience.

Further actions/initiatives include:

- **Live Chat & AI Chatbot Integration:** Customers can engage in instant, interactive communication through live chat available on the portal and mobile apps. An AI-powered chatbot acts as a digital assistant, guiding users through the features of the COSMOTE App, website, and What's Up App.
- **Conversational Sales Assistant:** A real-time digital assistant that tracks users on key sales pages and engages them via chat.
- **Automated Speech Recognition (ASR):** The Group has unified its Interactive Voice Response (IVR) systems into a single voice application. Powered by conversational AI, it enables efficient self-service options, aligning with the Group's commitment to a seamless, omni-channel customer journey.
- **Sign Language Video Call Support:** Enhancing accessibility, the customer service team offers personalized support through video calls in sign language via the portal, empowering customers with hearing disabilities and promoting digital inclusion.

- **Dedicated social media Team:** A specialized team manages all customer interactions across social media platforms, ensuring timely and consistent responses to customer inquiries and feedback.
- **COSMOTE UFixIt:** A remote support service enabling customer care agents to view issues in real time via secure video streaming from the customer's smartphone or tablet, providing step-by-step guidance for resolving technical problems.
- **Just Digital:** To facilitate easy self-care, Customer Care Agents send SMS messages containing deep links and concise instructions. Customers can click the link to be directed straight to the relevant app or webpage to complete their request seamlessly.
- **Novus Team:** A team of Technical Solution Experts equipped with advanced diagnostic tools to resolve issues quickly and effectively. Their focus is on achieving first-contact resolution and minimizing fault escalations, thereby enhancing customer satisfaction.

Driven by its commitment to offer superior customer experience, OTE Group has streamlined its complaint management structure by removing multiple levels of request handling and minimizing resolution time. In 2025, 67% of complaints were resolved on the same day. Customer complaints are handled end-to-end solely by the Customer Care Frontline.

The Group prioritizes delivering an effortless experience across both physical and digital channels, ensuring an Omni-Channel Customer Experience. By understanding diverse customer needs, the Group responds with flexibility and insight, providing high-quality service aimed at improving everyday life. This is achieved through First Contact Resolution (FCR) and, when further action is required, by closely monitoring requests and confirming their resolution with responsibility and consistency, resulting in fewer complaints and more satisfied customers.

The Group continuously enhances its digital self-care capabilities, attracting more customers to regularly use the apps to fulfill their requests, while maintaining high satisfaction ratings in app stores and reducing the need to call for support. Customers use the apps to view and pay their bills; top up their prepaid or other balances; activate packages, offers and new mobile lines; manage their home connectivity (router and fault management); renew or change their plans; receive chat support; activate services such as extending the expiry date of their bill or setting up a settlement; and reconnect instantly.

In the area of Fault Management, the COSMOTE TELEKOM App enhances customer experience by enabling users to track the progress of reported faults in real time, offering transparency and clear visibility of the estimated resolution time. Additionally, the unique ticketing system ONE Ticket that is integrated with all touch points (call centers, COSMOTE App & web and physical shops) enables customers to submit and handle all requests, technical support and commercial, ensuring relevance of information, personalization, and transparency. As a result, ONE Ticket contributes to the improvement of customer experience by enabling unified and omni-channel customer service.

4.2.4 Customer Surveys

Customer satisfaction is measured using the globally recognized TRI*M method. In 2025, high scores were achieved on the TRI*M Index, reflecting strong customer loyalty. According to the 2025 TRI*M Customer Survey, 88% of customers in Greece rated the company's overall performance as Excellent, Very Good or Good. Additionally, high scores were achieved on the question "How would you evaluate the company as to: whether the company makes me feel like I am in good hands?", as 84% of customers in Greece responded "Excellent, Very Good or Good".

OTE Group systematically collects customer feedback on a daily basis through its Voice of the Customer Program. Using a unified survey platform, the Group measures key performance indicators such as Net Promoter Score (NPS), Satisfaction, Request Resolution, and Customer Effort. Customers are invited to provide feedback following interactions, upon completing specific journeys, or while using products and services. Thousands of customers responses have been collected and analyzed to better understand the drivers of satisfaction and dissatisfaction. Based on these insights, targeted initiatives have been implemented to improve customer experience across products, services and touchpoints. As a result of these ongoing efforts, the NPS improved in 2025 compared to 2024, demonstrating continued progress in enhancing customer loyalty and experience.

4.2.5 Protection of Minors

As stated in its Code of Human Rights, OTE Group strives to protect children and young people when they are using

digital media and take the relevant criteria for the protection of children and young people into account when developing its products and services.

OTE Group offers products and services for the safe use of internet, e.g., parental control services through [COSMOTE Total Security](#). Beyond product development, the Group also works to raise awareness among children, young people, and their parents, through specific educational programs with representatives and specialists from the Cyber Crime Unit of the Hellenic Police.

OTE Group, as a member of Deutsche Telekom, participates in the "ICT Coalition for Children Online," adopting high voluntary standards that are hugely important to the online security of children. Additionally, in collaboration with other mobile telephony providers in Greece the Group has contributed to the development of the "National Code of Conduct for mobile phones and protection of users".

OTE Group supports critical infrastructure and provides financial support to hotlines serving vulnerable groups, particularly children in need. The Group actively supports the operation of the following helplines:

- SOS 1056, "The Smile of the Child".
- European Hotline 116000 for missing children, "The Smile of the Child".
- European Helpline for Children 116111, "The Smile of the Child".
- European Helpline for Domestic Violence 116016, "The Smile of the Child".
- European Helpline for victims of criminal acts 116006, "The Smile of the Child".
- 11525 Advice Helpline "Together for Children".
- 10454 "ELIZA" Helpline, for guidance on suspected child neglect or abuse.
- National Hotline for Missing Adults 1017.

OTE Group is also dedicated to digital inclusion and education, offering programs such as Educational Robotics and STEM for children. In 2025, the Group donated approximately €500,000 to 22 nonprofit organizations supporting child welfare.

Furthermore, in partnership with the non-profit organization "Pediatric Trauma Care", the Group contributed over €680,000 to equip three children's hospital units in Greece with vital medical equipment. Over the past 14 years, OTE Group has supported 26 pediatric hospital units across the country, helping improve care for around 100,000 children annually.

4.3 Social Contribution

This section contains information complementary to the [Sustainability Statement](#).

The Group aims to address both fundamental and emerging social needs through a range of long-term programs and innovative initiatives. Technology lies at the core of its social contribution strategy, enabling an inclusive and equitable digital society while advancing social well-being, environmental protection, and quality of life.

OTE Group's social strategic approach focuses on three key areas:

- **Digital Society:** Actions that provide digital skills and tools to eliminate inequalities and barriers, ensuring everyone can benefit from today's technological opportunities.
- **Social Commitment and Volunteering:** Initiatives that support vulnerable groups and reduce social inequalities, while also fostering a spirit of solidarity and active engagement among OTE Group employees toward various social causes, especially in crisis situations.
- **Environmental Commitment:** Adoption of sustainable practices, contributing to natural resource protection, and raising community awareness.

4.3.1 Management and oversight of social contribution initiatives

To ensure optimal management of its initiatives, OTE Group systematically develops internal mechanisms and processes.

OTE Group's Donation Policy defines the specific transparent and mandatory procedures to be followed by the OTE Group companies when assessing and implementing Donations, based on the action areas defined by its strategy.

OTE Group's Sponsoring Policy describes how to deal with Sponsorship issues by setting out clear criteria for implementing the procedure which needs to be followed by the OTE Group companies in order to carry out Sponsorships, ensuring transparency regarding the efficient use of resources allocated for Sponsorships.

The Chairman and CEO, along with Senior Management, oversee the goals and strategy of key social initiatives and are regularly informed about the implementation. Ongoing stakeholder dialogue informs the development of new initiatives, while data is collected to measure and monitor their impact.

In 2025:

- **€2.5 million** in total social contribution (including both in-kind and financial support).
- **€2.6 million** in total social investment (including implementation costs and employee volunteering efforts).
- **1.2 million** beneficiaries.

High Speed Connectivity for Selected Remote Schools in Greece: In 2025, COSMOTE TELEKOM continued to promote digital inclusion and equal access to education through its program for remote schools across Greece. In collaboration with the Ministry of Education, the company provided selected remote schools with high-speed internet connectivity of up to 300 Mbps via COSMOTE 5G Wi-Fi, enabling reliable access to digital learning tools and distance education. To further support students and educators, T-tablets were also provided to all remote schools participating in the program, enhancing classroom connectivity and facilitating participation in the digital society. Through this initiative, COSMOTE TELEKOM helps reduce the digital divide, supports modern educational practices, and ensures that children in geographically isolated areas have access to the same learning opportunities as their peers. Almost 20,000 students and 4,000 educators benefited from the program.

Educational Robotics: COSMOTE TELEKOM is one of the first companies in Greece to systematically invest in the dissemination of educational robotics and STEM (Science, Technology, Engineering, Mathematics) educational methodology in Greek schools, over the past 11 years. The company has implemented a series of actions, in partnership with the NGO "WRO Hellas" for educational robotics and science, contributing to the development of digital skills of over 360,000 children and teachers. In 2025, 1,208 teams of students participated in the 2025 National Educational Robotics Competition for kindergarten, primary, junior high and high school students. In alignment with the theme "Can we survive on Mars?", they presented innovative ideas and various robotic solutions in different categories of the local and final events. In the last 11 years, there have been more than 60,000 student participations in the competitions.

Educational Programs and Digital Experience in the OTE Group Telecommunications Museum: In 2025, the OTE Group Telecommunications Museum continued to enrich its educational and digital portfolio, offering both on-site and online programs for school groups and families. School activities included guided tours, STEM programs, creative art workshops, and awareness sessions on safe internet use. For the fifth consecutive year, the Museum delivered online art workshops to remote primary schools across Greece. The workshops introduced refreshed content and hands-on activities designed to engage students with essential themes such as recycling, sustainability, and environmental protection. For families, the Museum provided a diverse mix of art workshops, educational activities, STEM programs, and guided tours of its permanent exhibition, enhanced by updated digital tools including audiovisual material and immersive Augmented Reality and Virtual Reality applications. Additionally, on-demand educational videos remained available on the Museum's website, enabling visitors to explore the Museum's content at their own convenience. In 2025, a total of 10.400 visitors participated in the Museum's digital and in-house educational programs and guided tours. Overall, 275 educational programs were carried out for schools, families, and other groups, further expanding access to cultural and scientific learning.

COSMOTE BLUE: Through the COSMOTE BLUE initiative, COSMOTE TELEKOM is committed to take action for the protection of the environment and in particular of the Greek seas and the reduction of the risk of biodiversity loss in marine ecosystem. COSMOTE TELEKOM joins forces with the social enterprise ENALEIA, aiming at the removal of plastic pollution from the marine environment of Greece. By 2025, the initiative aims to collect >90 t of plastic from the marine areas of the Thermaikos, Halkidiki, and Argosaronikos Gulf, and Crete by engaging professional fishermen and more than 45 dishing vessels of the ENALEIA network; train >200 fishermen in sustainable fishing methods, good

practices for cleaning seas, and responsible management of fishing equipment; and recycle >52 t of the collected plastic for conversion into new products such as jackets, shoes or even furniture. The initiative met all its defined goals. Until 2025, 94.7 t. of plastic was collected and >54 t. was recycled. The results of this collaboration are externally assured by an independent third party, ensuring transparency and credibility.

Employee Volunteering and Donations: In 2025, OTE Group launched a new corporate volunteering program aiming to strengthen its commitment to social contribution through the engagement of the COSMOTE TELEKOM VOLUNTEERS. The program invites both employees and management to actively support vulnerable groups, environmental protection, and digital awareness initiatives. In 2025, there were over 4,500 employee participations in initiatives that foster a culture of giving and create measurable positive impact on society and the environment.

More information on OTE Group's social and environmental initiatives can be found at its [website](#).

5 Governance

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5.1 Compliance

This section contains information complementary to the [Sustainability Statement](#).

OTE Group’s compliance policies, available on the corporate website, reflect the company’s strong commitment to ethical conduct and integrity. Key principles include:

- **Prohibition of Facilitation Payments:** As stated in the OTE Group Code of Conduct, facilitation payments are strictly prohibited.
- **Guidelines on Gifts, Favors, and Entertainment:** The OTE Group Benefits Policy outlines rules for accepting and granting benefits between OTE Group employees and external parties. It also regulates the provision of benefits by the company to its employees, ensuring transparency and fairness.
- **Anti-Corruption and Conflict of Interest Measures:** The Policy on Avoiding Corruption and Other Conflicts of Interest sets out clear procedures to prevent bribery and corruption, manage real or potential conflicts of interest, and address any incidents that may compromise the interests of the company, its customers, or its business partners.
- **Political Neutrality and Ethical Sponsorships/Donations:** In line with the Code of Conduct, Donation Policy, and Sponsoring Policy, OTE Group does not provide donations or benefits to political parties, elected officials, or politically motivated initiatives. The use of company resources for political purposes is not permitted. These policies also clearly define the types of donations and sponsorships allowed, including supported sectors, selection criteria, and prohibited activities.

All OTE Group employees, upon hiring and on an annual basis, are required to digitally or manually sign that they are aware of and comply with the Group’s Code of Conduct, as well as with all other Compliance policies, which are available in local languages.

In total, 88% of employees received training through the ‘Basic Knowledge Compliance’ e-learning program, which serves as the core online course for all OTE Group employees. The e-learning content covers the Code of Conduct, conflicts of interest, anti-corruption principles, and includes a self-assessment to guide ethical decision-making in complex situations.

Online training materials on AI Digital Ethics are available on the Group’s intranet, along with an online course on the EU AI Act. These resources inform employees about relevant guidelines and the potential impacts on the Group and their roles.

Throughout 2025, within the context of ongoing compliance monitoring:

- 24 tip-offs were received concerning potential incidents of embezzlement, theft, or fraud. Of these, 14 cases were confirmed following investigation.
- Incidents involving employee misconduct related to fraud or violations of the OTE Group Code of Human Rights and OTE Group Code of Conduct:
 - 6 cases led to the termination of employee contracts.
 - 3 cases resulted in disciplinary sanctions imposed by the competent internal disciplinary bodies.

- 2 confirmed fraud cases met the materiality criteria and were accordingly reported to the OTE Group GRC Committee, the OTE Audit Committee, the OTE Board of Directors, and Deutsche Telekom Group Compliance Management.
- No court convictions for corruption issues against OTE Group or its employees in relation to their professional activities occurred.
- No fine or non-pecuniary penalty (e.g., suspension of operating license or prohibition of business activity) for corruption or fraud violations (including tax fraud and manipulation of financial reporting) was imposed on OTE Group companies.
- No plausible cases of conflicts of interest.
- No cases of money laundering / insider trading.
- No fines for anticompetitive behavior.
- No incidents of corruption or anti-competitive behavior were identified regarding contracts with business partners that led to contract termination or non-renewal.
- No case or incident were recorded that resulted in the exclusion of suppliers from the tender procedures.

5.2 Human Rights

The Group has adopted the "[Code of Human Rights](#)". The principles and expectations described in the Code are aimed equally at the Group's employees, as well as to its suppliers and business partners.

The Human Rights Risk and Impact Analysis of the Group's operations is carried out in accordance with the Enterprise Risk Management (ERM) methodology and includes risk mapping, potential risk scenarios, likelihood of occurrence, key impacted business areas, as well as implemented and proposed mitigation measures. This analysis was conducted across all OTE Group companies during the periods 2018–2019 and 2021–2022. A new assessment cycle took place in 2025, according to the provisions of the updated Code of Human Rights and the Deutsche Telekom methodology.

As part of the Compliance Training Program, all classroom training courses, from introductory to advanced levels, include information and guidance on the OTE Group Code of Human Rights. These trainings are tailored to different audiences, including employees without managerial responsibilities, governance body members, and managers or expert-level employees. Sessions are delivered either in person or digitally.

OTE Group offers online training programs on Human Rights and Diversity Equity, and Inclusion (DEI), providing its employees with foundational knowledge to foster a shared understanding and inclusive workplace culture.

Since Q4 2024, 686 OTE Group Managers have been participating in custom-designed (by the Wellness & Safety business unit in collaboration with the Compliance & ERM unit) live webinars titled "Prevention and Handling of Violence and Harassment Issues in the Workplace". These sessions provide practical guidance on identifying and addressing instances of bullying or harassment, as well as on appropriately responding to reports of misconduct. The overall participation rate reached 90.62%. In addition, 137 OTE Group employees attended a live webinar on the same content. The training material is currently available (via video recording) to Group employees via Mynet.

Furthermore, employees at COSMOTE Shops and GERMANOS Shops and Shop Partners were trained on the OTE Group Code of Human Rights principles via an online training course available via platform "Sales Training". The roll out was in December 2025 and the participation rate had already reached 33.7% by end of the year. The training is in progress in Q1 2026.

Training participation is actively monitored to ensure alignment and awareness across all employees. Specifically, for online trainings available on the PERCIPIO or HR-SUITE training platforms, automated reminder emails are sent to employees with pending training obligations, at least once per month, to encourage timely completion.

In 2025, no convictions were issued against OTE Group by the judiciary authorities concerning any discrimination in the workplace.

31 tip offs related to potential human rights breaches were submitted in 2025. Of these, 7 cases were confirmed, 22 were assessed as not confirmed/not plausible, and 2 remained under investigation. Among the confirmed cases, 6 involved incidents of harassment or discrimination. Following thorough investigations by Compliance, three cases resulted in termination of employment. None of the confirmed cases met the materiality criteria for escalation to the Board of Directors or other relevant Committees.

5.3 Responsible Purchasing and Supply Chain

This section contains information complementary to the [Sustainability Statement](#).

OTE Group believes that the diffusion of key values and standards in the supply chain is an important feature of responsible business conduct.

To achieve this OTE Group is committed to its Strategic Pillars of:

- Setting standards and requirements,
- Monitoring and assessing impacts and risks in the supply chain and partners,
- Preventing and remediating risks,
- Communicating process and results.

All procurement practices are carried out according to the OTE Group Procurement Policy, which sets out all the terms and regulations under which purchases of products, materials/equipment, services or works by vendors (suppliers) are made. The Policy aims to:

- Optimize value in terms of cost, quality and time.
- Ensure transparency through the procurement process.
- Align with Deutsche Telekom's Global Procurement Policy.

While the Procurement Policy does not distinguish between local and non-local suppliers, it is common practice for the Group Companies to support domestic suppliers. This practice is reflected in the 2025 procurement data, where 80.5% of total sourcing in Greece was conducted with local suppliers.

OTE Group companies aim to ensure the timely payment of their suppliers, as defined in their procurement contracts. In 2025, payments made to suppliers ranged from 0 (immediate) to 120 days, based on the type and value of the procurement.

Employees in the purchasing departments receive training provided by OTE Group, covering topics such as the Group's Procurement Policy and the Supplier Code of Conduct. For example, in 2025, employees from Group Central Procurement unit participated in a customized compliance training session concerning Anti-corruption and Third-party Compliance issues.

Legal documents of prospective suppliers are reviewed regularly by the OTE Group Compliance department, during the procurement process and prior to contract signing, in order to determine prospective suppliers' good legal standing and solvency. In 2025, 1,100 Integrity checks / Compliance Third party Assessments of suppliers, consultants and partners were completed. Furthermore, 100% of the prospective suppliers for Central Procurement purchases equal or exceeding €200,000 for OTE, GERMANOS, CTS and COSMOTE E-VALUE or exceeding €30,000 for ICT projects, as well as 100% of prospective consultants regardless of the purchase value, were reviewed and checked, unless they had already been checked within the last 2 years.

OTE Group's active suppliers are evaluated on a yearly basis. Suppliers are selected based on the purchase orders issued within a 12-month period. More specifically the selection of suppliers for evaluation was based on all orders issued between 1/10/2023 - 30/9/2024, on behalf of OTE, GERMANOS, CTS, CGS, COSMOTE Payments, Rural North, Rural South and COSMOTE e-Value SA.

Supplier evaluation included:

- All suppliers with orders of more than € 2 million (for all the companies mentioned above).

- All suppliers providing important types of supply (i.e. products and services that have a significant effect on the products and services provided to customers) worth over € 500,000.
- All suppliers of products and services related to the Group Consolidated Management System.
- Certain suppliers who did not meet the above criteria but were proposed for evaluation by OTE Group Managers.

Supplies related to intercompany transactions, commissions to merchants, interconnection & roaming expenses, sponsorships, as well as donations are excluded.

Suppliers evaluated are asked to complete a self-assessment questionnaire regarding their performance on sustainability issues. This questionnaire aims to promote awareness on social and corporate responsibility. It includes questions related to corporate responsibility, sustainable development, employment, human rights, business continuity, health and safety, quality and the environment. Questions refer to the suppliers' performance, as well as to their suppliers' and sub-contractors' performance.

During 2025, in the scope of its annual active supplier evaluation, for the period between 01/10/2023 – 30/09/2024, 285 suppliers were evaluated, representing 88.6% of the annual procurement volume.

OTE Group has established supplier training material in order to help them raise awareness on important sustainability issues and to support them in complying with the Group's sustainability requirements.

5.4 Business Continuity

OTE Group maintains a strong commitment to Business Continuity as a key element of operational resilience and long-term value creation. The Group's Business Continuity Management System (BCMS), certified under ISO 22301:2019 across major subsidiaries (OTE, CTS, GERMANOS, COSMOTE e-Value), enables systematic identification, assessment, and mitigation of risks that could disrupt critical services.

Understanding the strategic importance of telecommunications for the economy and society, OTE Group embeds Business Continuity into its governance and operational framework. This proactive approach ensures uninterrupted product and service delivery, protects stakeholder confidence, and enhances public trust in the Group's capabilities.

The Business Continuity Management System (BCMS) provides a consistent and structured method for identifying threats to protect against, reduce the likelihood of, timely respond to, and recover from adverse events and disruptions. Through the implementation of this Management System, OTE Group is committed to enhancing the organization's resilience and minimizing the potential impact of threats on business operations.

As part of this method, the OTE Group Business Continuity team implements and maintains a systematic process to assess the risk of disruption and analyse the business impacts. A digital tool will be used for conducting Business Impact Analyses, and respective Business Continuity Plans (BCPs) to be implemented when dealing with disruptive incidents. A dedicated operational structure is in place to prioritize the necessary actions during incident management. Key performance indicators (KPIs) and the internally developed BCMS Maturity Tool are used to monitor and evaluate system performance and effectiveness.

The Group collaborates closely with public authorities and participates in interdepartmental and international working groups to exchange practices and enhance resilience. Awareness initiatives include training for new employees, the publication of articles and guidelines via the Group's intranet, participation in global initiatives like the BCAW and targeted awareness campaigns for specific internal audiences. These efforts aim to promote a culture of preparedness across all business functions.

Complementing these efforts, the Group maintains annual Network Recovery and IT Disaster Recovery Programs to ensure the availability of critical IT infrastructure. These initiatives support end-to-end service continuity and provide a reliable foundation for business-critical operations. In 2025, OTE Group reported an average interruption frequency of 0.077 times per month and a customer average interruption duration of 6.24 minutes, highlighting the robustness of its operational continuity measures.

5.5 Data Security and Privacy

This section contains information complementary to the [Sustainability Statement](#) and the [Transparency Report](#).

Data protection and data security are extremely important to OTE Group. Strict data protection and security requirements are integrated both in the development of its products and services and into their use by customers. Customers can be informed about how OTE Group processes their data in the respective [Data Privacy Notice](#).

Compliance monitoring activities are essential to ensuring adherence to the data privacy and security framework. The security, data privacy, and internal audit functions conduct audits and assessments that cover these critical areas. The results of these reviews help maintaining a high level of data privacy and security. Furthermore, OTE Group Companies (OTE, COSMOTE e-Value, CTS, CGS and GERMANOS) apply an enterprise information security management system according to ISO/IEC 27001:2013 requirements and a privacy information management system based on ISO 27701 (except for CGS), certified on an annual basis from an independent body. In addition, OTE Group carries out third-party data processing self-assessments to monitor compliance with the requirements set out in data processing agreements signed with data processors. These assessments are conducted through an online questionnaire covering the relevant contractual data protection and security obligations.

To stay ahead of unconventional cyber threats, the Security Operations Center (SOC) operates 24/7. Networks and telecommunication infrastructure are continuously monitored for unusual activity or vulnerabilities that may indicate a potential compromise. In such cases, the expert personnel overseeing security operations ensure that any event is promptly identified, analyzed, addressed, and reported, all within the Group's defined risk tolerance levels. A security and privacy hotline is in place to support employees in reporting any security and privacy related incidents to the SOC. Additionally, OTE Group offers SOC services to other companies, helping them defend against cyberattacks.

Additionally, in 2025, OTE investigated 5 customer requests, regarding the confidentiality of communications/security of customer data, and 16 requests from the Hellenic Authority for Communication Security and Privacy (ADAE). OTE also handled 21 complaints that were submitted to the Hellenic Data Protection Authority (DPA).

In 2025, OTE reported 16 incidents to the DPA and the ADAE, by adhering to GDPR and L.3471/2006 for the protection of personal data and privacy in the electronic telecommunications sector. 100% of those incidents involved personally identifiable information, with a total number of 18 customers affected. During the reporting year, no significant cases of data breaches occurred.

During the year, €615k total fines were imposed by ADAE for incidents of SIM Swapping, unauthorized Call Forwarding, Improper use of Personal Data and Communication Data Breach that occurred in the years 2020, 2021, 2022 and 2023.

6 Indexes

6.1 ATHEX Index

OTE Group reports its ESG disclosures and practices in line with the Guide's recommendations (version 2024). Detailed information can be found in the table below.

Topic	ESG Metric ID	Metric Title	Section / Comments
Environmental			
Core Metrics	C-E1	Scope 1 emissions	Scope 1 emissions: 17,911 t CO ₂ eq GHG intensity of scope 1 emissions: 4.92 t CO ₂ eq per million EUR Annual Financial Report 2025 / Statements of Financial Position (and note 9) and Sustainability Statement 2025, E1-6
	C-E2	Scope 2 emissions	Scope 2 emissions (location-based): 124,035 t CO ₂ eq Scope 2 emissions (market-based): 58 t CO ₂ eq GHG intensity of scope 2 emissions: 34.13 t CO ₂ eq per million EUR (location-based) GHG intensity of scope 2 emissions: 0.016 t CO ₂ eq per million EUR (market-based) Annual Financial Report 2025 / Statements of Financial Position (and note 9) and Sustainability Statement 2025, E1-6
	C-E3	Energy consumption and production	Energy consumption: 467,901 MWh Percentage of electricity consumed: 91% Percentage of renewable energy consumed: 91% Total amount of energy produced: 1,627 MWh Total percentage of energy produced from RES: 100% Annual Financial Report 2025 / Statements of Financial Position (and note 9) and Sustainability Statement 2025, E1-6
Advanced Metrics	A-E1	Scope 3 emissions	Total scope 3 emissions: 445,685 t CO ₂ eq GHG intensity of scope 3 emissions: 122.65 t CO ₂ eq per million EUR Annual Financial Report 2025 / Statements of Financial Position (and note 9) and Sustainability Statement 2025, E1-6
	A-E2	Climate change risks and opportunities	Annual Financial Report 2025 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2025, ESRS 2 IRO-1 E1, ESRS 2 SBM-3 E1 Detailed information concerning climate change risks and opportunities identified can be found in the latest response of OTE to CDP.
	A-E3	Waste management	Hazardous waste: 1,404.27 t Non-hazardous waste: 3,880.95 t Total waste, % recycled: 86% Total waste, % recovered: 9% Total waste, % incinerated: 2% Total waste, % landfilled: 3% Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, E5-5
	A-E4	Effluent discharge	Water
	A-E5	Biodiversity sensitive areas	Biodiversity
	A-E6	Climate change policy	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, E1-1, 2, 3, 4 Energy and Climate Change
	A-E7	Removals and carbon credits	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, E1-7

Topic	ESG Metric ID	Metric Title	Section / Comments
	A-E8	Total GHG emissions	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, E1-6
Sector-specific	SS-E7	Critical materials	OTE Group does not use or manage critical materials as OTE Group companies do not actually manufacture any products themselves.
Social			
Core Metrics	C-S1	Stakeholder engagement	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, ESRS 2 SBM-2, S1-2, S2-2, S4-2 OTE Group Regulation of Operations, Article 36: Communication Channels
	C-S2	Female employees	40% / Sustainability Statement 2025, S1-6
	C-S3	Female employees in management positions	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, S1-9 Supplementary HR Data
	C-S4	Employee turnover	Supplementary HR Data
	C-S5	Employee training	Supplementary HR Data Average training hours of employees (excl. top management): 20.82
	C-S6	Human rights policy	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, S1-1 OTE Group Code of Human Rights Human Rights
	C-S7	Collective bargaining agreements	Supplementary HR Data
	C-S8	Supplier assessment	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, S2-1, 2, 3, 4 OTE Group Supplier Code of Conduct Responsible Purchasing and Supply Chain
Advanced Metrics	A-S1	Sustainable economic activity	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, Disclosures pursuant to Article 8 of Regulation 2020/852 (Taxonomy Regulation)
	A-S2	Employee training expenditure	Supplementary HR Data
	A-S3	Gender pay gap	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, S1-16
	A-S4	CEO pay ratio	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, S1-16
Sector-specific Metrics	SS-S3	Legal requests of user data	Transparency Report Greece Data Security and Privacy
	SS-S5	Data security and privacy fines	Data Security and Privacy
	SS-S9	Grievance mechanism	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, S4-3

Topic	ESG Metric ID	Metric Title	Section / Comments
Governance			
Core Metrics	C-G1	Board composition	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, ESRS 2 GOV-1 and Corporate Governance Statement, Board of Directors and Committees that consist of members of the Board of Directors – Remuneration of the Board Members/ Remuneration of executive Board Members - Other administrative, managerial or supervising corporate bodies or committees, Diversity policy with respect to the administrative, managerial and oversight bodies corporate Average tenure of board members: 4.3 years
	C-G2	Sustainability oversight	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, ESRS 2 GOV-1
	C-G3	Materiality	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2024, ESRS 2 SBM-3, ESRS 2 IRO-1, ESRS 2 IRO-1 E1, ESRS 2 IRO-2, ESRS 2 SBM-3 E1
	C-G4	Sustainability policy	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, ESRS 2 GOV-1, ESRS 2 SBM-1 OTE Group Compliance Policies OTE Group Regulation of Operations, Article 35: Sustainability Policy
	C-G5	Business ethics policy	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, S1-1 OTE Group Compliance Policies
	C-G6	Data security policy	Annual Financial Report 2025 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2025, ESRS S4-1, 2, 3, 4, Cybersecurity – Policies OTE Group Information Security and Personal Data Protection Data Security and Privacy
	C-G7	Sustainability reporting	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, ESRS 2 BP-1
	C-G8	Financial reporting	February 26, 2025
Advanced Metrics	A-G1	Business model	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, ESRS 2 SBM-1
	A-G2	Business ethics violations	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, ESRS G1-4 Compliance Human Rights
	A-G3	ESG targets	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, ESRS 2 SBM-1, E1-4, E5-3, S1-5, S4-5
	A-G4	Variable pay	Annual Financial Report 2025 / Annual Report of the Board of Directors / Corporate Governance Statement, Compensation of Executive Members of the Board of Directors for year 2025 Remuneration Report for the Members of the Board of Directors
	A-G5	External assurance	Annual Financial Report 2025 / Auditor's Report / Independent Auditor's Limited Assurance Report on Sustainability Statement
	A-G6	ESG bonds	OTE Group has not issued an ESG bond yet.

Topic	ESG Metric ID	Metric Title	Section / Comments
	A-G7	Integration of sustainability-related performance in incentive schemes	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, GOV-3 and Corporate Governance Statement, Compensation of Executive Members of the Board of Directors for year 2025 Remuneration Report for the Members of the Board of Directors
Sector-specific Metrics	SS-G1	Whistleblower policy	Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, ESRS 2 SBM-3 G1, G1-1, 3
	SS-G3	Systemic risk management	Annual Financial Report 2025 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2025, ESRS 2 GOV-1 and Corporate Governance Statement, Internal Control System

6.2 SASB Index

The table below presents the response of OTE Group in relation to the sector-specific criteria of the Telecommunications Sustainability Accounting Standard (version 2023-12) issued by SASB (Sustainability Accounting Standards Board).

Code	Telecommunication Services SASB Metric	Disclosure
Environmental Footprint of Operations		
TC-TL-130a.1	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	1,684,443.6 GJ 91% 91% Annual Financial Report 2025 / Annual Report of the Board of Directors / Sustainability Statement 2025, E1-5
Data Privacy		
TC-TL-220a.1	Description of policies and practices relating to behavioral advertising and customer privacy	Annual Financial Report 2025 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2025, ESRS S4-1, 2, 3, 4, Cybersecurity – Policies OTE Group Information Security and Personal Data Protection Data Security and Privacy
TC-TL-220a.2	Number of customers whose information is used for secondary purposes	Quantitative data not publicly available.
TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Data Security and Privacy
TC-TL-220a.4	(1) Number of law enforcement requests for customer information, (2) number of customers whose information was requested, (3) percentage resulting in disclosure	Transparency Report Greece
Data Security		
TC-TL-230a.1	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of customers affected	Data Security and Privacy
TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Annual Financial Report 2025 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2025, ESRS S4-1, 2, 3, 4, Cybersecurity – Policies
Product End-of- life Management		
TC-TL-440a.1	(1) Materials recovered through take back programs, percentage of recovered materials that were (2) reused, (3) recycled, and (4) landfilled	Circular economy – Circularity in own operations
Competitive Behavior & Open Internet		
TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	Compliance
TC-TL-520a.2	Average actual sustained download speed of (1) owned and commercially associated content and (2) non-associated content	Mobile Average Download speed: H1 2025: 159.24 Mbps H2 2025: 167.27Mbps No distinction is made between associated and non-associated content.

Code	Telecommunication Services SASB Metric	Disclosure
TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating and related practices	Annual Financial Report 2025 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year and Sustainability Statement 2025, ESRS 2 SBM-3 S4 OTE Group Code of Conduct for Electronic Commerce Net neutrality and open internet
Managing Systemic Risks from Technology Disruptions		
TC-TL-550a.1	(1) System average interruption frequency, (2) customer average interruption duration and (3) customer average interruption duration	Business Continuity
TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	Annual Financial Report 2025 / Annual Report of the Board of Directors / Risks and Uncertainties for the Next Year Business Continuity
Activity Metrics		
TC-TL-000.A	Number of wireless subscribers	Annual Financial Report 2025 / Financial and Operational Highlights of 2025
TC-TL-000.B	Number of wireline subscribers	Annual Financial Report 2025 / Financial and Operational Highlights of 2025
TC-TL-000.C	Number of broadband subscribers	Annual Financial Report 2025 / Financial and Operational Highlights of 2025
TC-TL-000.D	Network traffic	OTE Group 15,051.8 PB OTE Group in Greece 14,743.8 PB