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OTE Group Diversity, Equity and Inclusion Policy

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04/08/2021



Summary

With this OTE Group Policy, we aim to promote the values of diversity, equity and inclusion in the workplace (DE&I).

Document Approvals & Document Revision History

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|--|----------------------|-----|------------|---|
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The Executive Director Internal Audit OTE Group has been notified on this Policy:

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1. Preamble

Diversity, equity and inclusion (DE&I) are essential success factors for companies. As a leading Group, offering telecommunications and technology solutions, we see the DE&I values as key to our long-term business success and as important elements of our corporate social responsibility.

We unite a diverse corporate culture that reflects the various facets of society and thus, addresses the different needs of our customers. We build on this diversity to achieve business success, because diverse workforces perform better and are more innovative. This allows us to stand out as an attractive employer and preferred business partner.

As one of the leading technology companies in Greece, we want to meet the essential human need for connection and enable it technologically for everyone around the globe.

We reflect and strengthen our objective and our Guiding Principles amidst business and social changes, such as worldwide demographic change, globalization, and digitization. In our aspiration also lies the value of inclusion, which illuminates our purpose in a non-discriminatory, holistic and socially sensitive way, building on our long-standing guiding principle, "Act with Respect and Integrity."

Across all diversity dimensions (see 4.1), OTE Group values and promotes the innovative opportunities offered by diverse skills, opinions and ideas. We are committed to a work environment in which these come to fruition and foster a sense of belonging for all employees.

Achieving sustainable change and improvement for the company and its employees requires the full participation and personal accountability of all parties to this Diversity, Equity and Inclusion (DE&I) Group Policy.

2. Area of Application

This Policy is adopted by a decision of the competent corporate bodies, in order to be applied to all OTE Group employees. The word "employees", "personnel", "human resources" refers to all people who work at the OTE Group: Board members, managing directors, executives, employees, who offer their services at the OTE Group under any form of contract (e.g. full time agreement, independent services agreement, project agreement, retainer fee-mandate).

Moreover, wherever the word "Group" is mentioned it refers to OTE S.A., every affiliated to OTE S.A. company, within the meaning of article 32 of Law 4308/2014, as well as to the above mentioned companies as a whole.

3. Access Rights

This Policy is uploaded to Process web. Access to this policy is free for all employees. The distribution of this document outside the Company is not allowed.

4. Diversity, Equity and Inclusion in OTE Group

Definition, Strategies, Goals and Benefits of DE&I

Diversity is a term that describes the differences in our workforce based on demographic, personal or societal factors. This includes the diversity dimensions: Age, gender identity and gender expression, people with different physical and mental abilities, nationality, social and ethnic origin, social status, religion and belief, political opinion, sexual identity and sexual orientation.

Equity describes the basic attitude that every person should have fair opportunities, access and development possibilities, regardless of individual circumstances.

Inclusion describes the way in which we consciously involve different people (employees and others such as customers, suppliers, partners) in work and decision-making processes and give them a sense of belonging and value within our organization.

For OTE Group, diversity, equity and inclusion constitute a management concept and a part of our corporate culture, aiming to make a significant contribution to the business success of the OTE Group through the recognition, appreciation, inclusion, fair treatment and promotion of our diverse individual stakeholders (employees, shareholders, customers, suppliers).

OTE Group also sees itself as an active member of society. That is why we use our power to shape change in the areas we operate in and are committed to foster an open, diverse, digitally and physically inclusive and equal society.

We know that the right mix leads to better results. And for that purpose, inclusion, diversity and equity are essential for the assurance of OTE Group's long-term success.

4.1) Recognition of Diversity

The OTE Group recognizes the aforementioned diversity dimensions, takes them fully into account when implementing the DE&I concept and when applying diversity in the work environment. Depending on context, further dimensions can be considered when appropriate. These include education, parenthood, family status, culture, language, way of thinking and working, company affiliation and experience. We consciously and with an open mind acknowledge the diversity of our stakeholders and our social environment. We promote this diversity by acting proactively in our social and business areas. As a result, we create and consolidate connections and actions that enable us to grasp all opportunities and potential.

4.2) Equity and equal opportunities

We recognize that we have to go to the extra mile to elevate underrepresented groups through special measures in order to provide a fair chance and break down barriers.

We take measures to minimize physical or digital barriers within our business model, giving high priority to equity criteria in addition to economic aspects. We continue the integration of people with disabilities in the

workplace by dedicated means (e.g. technical aids) so that they can participate in an environment with equal working conditions.

To achieve a better work-life balance, we offer a wide range of work-life balancing options and adapt it to our constantly changing environment. Ever faster changes require an increasing flexibility of employees and in this context, we respect individual life plans.

4.3) Inclusion in the workplace is inherent in our company purpose

Inclusion describes the behavioral pattern by which we consciously involve different people in work and decision-making processes. The unconditional, open interaction with all stakeholders is the basic prerequisite for the optimal use of all operational potentials. Therefore, we pursue the employees' wellbeing and to ensure that all opinions can be heard. By committing to connecting everyone, we also create a culture and working environment in our company where everyone feels accepted for who they are and feels they belong.

4.4) Act with Respect and Integrity

OTE Group takes accountability for sustaining the DE&I values. We expect our employees to conduct themselves in accordance with this Group Policy.

Respect and integrity are key to our long-term business success. We aim at diversity, equity and inclusion and we act responsibly. We treat people the way we would like to be treated.

For us, integrity means doing the right thing. We not only comply with internal policies, regulations and the law, but always act in accordance with the guiding principle that Group has adopted "Act with respect and integrity". It is important for us that our people recognize the ethical dimension of their actions and act appropriately in any situation. OTE Group stands against immoral and unethical behavior. Being courageous in everyday business requires a range of values consisting of honesty, reliability, a sense of community and solidarity. We clearly name critical issues, unethical behavior or possible misconduct. All of our employees act with integrity and determination.

Employees of OTE Group do not tolerate any form of direct or indirect violence, discrimination or harassment at work– neither online nor offline.

We also, do not tolerate any kind of racism or anti-Semitism.

Consequently, when representing OTE Group, everyone shall refrain from behavior which could have a discriminatory and/or harassing effect on others, both inside and outside of the company. This includes OTE Group's public image (e.g. marketing actions).

We are committed to zero tolerance of any form of sexual harassment in the workplace, according to the provisions of "Policy on Avoiding Sexual Harassment within OTE Group". Throughout the Group, we treat all incidents seriously and investigate all allegations of sexual harassment. Following a confirmed complaint of misconduct, the employee will be punished in accordance with the applicable statutory provisions and employment law, regardless of the rank and position of the person in question within the Group.

In case of questions concerning the compliance with the above Policy or in the event of a doubt, tip off, violation or suspected violation of this Group Policy, employees should first contact their immediate supervisor. If this route is not possible, employees can contact the OTE Group Compliance Office through the following communication channels:

- Email: askmecompliance@ote.gr
- E-Mail: tellmecompliance@ote.gr
- E-Mail: humanrights@ote.gr

4.5) Diversity criteria to the Board of Directors and to the top and/or senior managers

In order to promote an appropriate level of differentiation in its Board of Directors and the creation of a diverse group of members, the Company seeks, through the accumulation of a wide range of qualifications and skills in the selection of members of the Board, to ensure the greatest possible pluralism and variety of views and experiences, in order to make the right decisions.

When selecting members of the Company's Board of Directors, exclusion due to discrimination based on gender, race, color, ethnic or social origin, religion or belief, property, birth, disability, age or sexual orientation is prohibited.

Moreover, in the Company the diversity criteria apply in addition to the members of the Board of Directors, to the top and/or senior managers, i.e. managers with managerial responsibility from Chief Officers to Directors. In this context, it is stipulated, as a good practice, the sufficient representation per gender at a rate of at least twenty five (25%) of all members of the Board of Directors of the Company, with application within the next three (3) years. Also, it is stipulated, as a good practice, the sufficient representation per gender of all top and senior managers of the Company, in order to be achieved the target of the sufficient representation per gender at a rate of at least thirty percent (30%) of the managers at OTE Group level in total, with application within the next three (3) years.

4.6) Alignment with Corporate Policies, Codes, Guiding Principles and Internationally Recognized Regulations, Instructions, Standards

With this global DE&I Group Policy, our intention is to foster the DE&I values as an addition to our corporate guiding documents such as our Group Code of Conduct, our Group Guiding Principles, our Group Code of Human Rights & Social Principles, our Employee Relations Group Policy and our Digital Ethics Guidelines.

Furthermore, we are working on extending the principles of DE&I to our entire value chain through our Supplier Code of Conduct, which is intended to be the basis for any collaboration with suppliers and consultants at OTE Group.

We are committed to the fundamental frameworks that comprise the issues of DE&I. These include the Universal Declaration of Human Rights, the International Labor Organization's Guidelines and Declaration of Principles for Multinational Enterprises and the ten principles of the United Nations Global Compact. Furthermore, we observe guidance from the EU anti-discrimination directives and local law in the respective countries where we operate in.

5. Implementing Diversity, Equity and Inclusion at OTE Group

The DE&I Policy is aligned with our business goals and strategies. In order to achieve the sustainable integration of DE&I in the business model and the daily activities of the OTE Group, the following recommendations should be observed and the following actions should be performed.

Achieving change and improvement for the Group and its employees requires the commitment and participation of all parties.

- The members of the Board of Directors and the management of the Group, who must act as role models, have a special responsibility for the application of the principles of diversity, encouraging diversity, open

thinking, integration into the work environment and diversity management, as well as promoting and rewarding *commitment in these areas*.

- Employees, at all levels and sectors of the Group make DE&I values, part of their professional life.
- Cooperation of different units of the company to facilitate compliance with the principles of DE&I.
- Conducting trainings aiming at strengthening the values of DE&I.
- Integration of DE&I values in the areas of human resources, product design and service provision.
- Support and organization of activities / events aiming at promoting the DE&I values.
- Carrying out a risk assessment DE&I issues, the results of which will be incorporated in the business objectives of the company.

With this Policy, OTE Group implements a holistic and integrated diversity, equity and inclusion management. This Policy is not a basis for legal claims or obligations.

6. Entry into force and Review of the Policy

This Policy enters into force for OTE SA. and is subsequently amended by decision of its Board of Directors. In the companies of the OTE Group, the Policy enters into force with a decision of their competent body.