

*COSMOTE GROUP CODE OF ETHICS*

# COSMOTE GROUP Code of Ethics

## **Contents**

1. Mission .....	3
2. Our business principles .....	3
3. Conduct between Colleagues .....	4
4. The Company's conduct towards Employees .....	4
5. The Employees' conduct towards the Company .....	5
6. Our conduct towards Customers .....	6
7. Our conduct towards Shareholders & the Investors' Community ..	6
8. Our conduct towards Suppliers & Associates .....	7
9. Our conduct towards Competitors.....	7
10. Our conduct towards the Authorities .....	7
11. Our conduct towards the Media .....	8
12. Our stance towards the Environment.....	8
13. We implement the Code of Ethics.....	8

## **1. Mission**

COSMOTE acknowledges that the safeguard of its long-term development and the protection of its shareholders' and social stakeholders' interests largely depend on the observance of established business ethics and principles of conduct by its Group's management and workforce.

The conduct and practice of each one of us at work contribute to shape our corporate culture. To this end, COSMOTE has adopted the present Code of Ethics that sets values and principles and defines how COSMOTE Group management and workforce should conduct themselves on a daily basis.

The Code of Ethics' core principle is that we all are responsible professionals, acting with honesty and sincerity and always assuming responsibility for our actions.

This document is supplementary to the effective legislation and binding for all Group members, regardless their country of operation.

## **2. Our business principles**

### **We develop our business with respect and integrity**

With our shareholders' and customers' interests as priority, we aim at continuously creating added value.

We define our targets and strategy with the protection of those interests in mind, taking at the same time into account the benefits to society and the protection of the environment.

We believe in protecting those interests based on the principles of respect, professional ethics, justice, honesty, as well as the open and systematic dialogue with all parties involved, in order to secure our long-term sustainable development and success.

### **We comply with the law & adopt business ethics principles**

COSMOTE Group management and workforce respect and comply with the laws and the effective regulatory framework, in all our countries of operation.

We adopt principles of business ethics. Any incident coming to our attention that deviates from the Code of Ethics principles and might damage the Group or individual companies should be reported to our manager or director, in order for the issue to be settled according to the relevant company procedures.

### **We are creative and pioneering because we want to stand out**

We constantly seek new ideas and strive to pioneer, aiming to outpace competition and contribute to the Company's long-term success.

As a Company, we continuously explore ways to offer new, positive experiences to our customers.

As employees, we focus on achieving corporate targets, while seeking new means to improve our work.

### **3. Conduct between Colleagues**

#### **We cooperate efficiently & foster team spirit**

Good cooperation between colleagues is a prerequisite for success and goes beyond any organizational constraints deriving from units and Group companies, where each one of us belongs.

We cooperate and actively support teamwork, showing our respect to different opinions and promoting open and honest dialogue to solve problems. We build relationships of trust, founded on team spirit beyond personal interest.

We count on each other. We keep our promises and commitments, demonstrating in practice our respect for each other.

### **4. The Company's conduct towards Employees**

#### **We respect our people**

Successful cooperation between management and employees presumes understanding the different role of each other and requires mutual respect. We foster an ambience of trust that promotes open dialogue, favours new ideas and contributes to finding commonly accepted solutions.

We respect our people and create a working environment, where all employees are aware of what is expected of them. They enjoy our support in developing their abilities, and everyone is treated with respect and dignity.

Focusing on the employees' protection, we secure the appropriate working conditions and respect the health and security rules, while enhancing our people's knowledge and alertness on emergency situations' handling.

We discourage any behaviour that might offend the employees' personality. Without exception we resent any form of abuse or sexual harassment strictly adhering to the letter and spirit of respective laws and codes of conduct.

#### **We are fair and just**

We found our relationship with our people on the principle of equal treatment, giving them the opportunity to evolve, depending on their performance and skills as well as the Group's needs. Using fair and systematic methods, we assess our employees and guide them towards achieving their targets and developing their professional skills.

### **We procure for the employees' development & training**

We support and encourage the development of our people's abilities and skills through continuous education and training.

We systematically record and analyse our employees' opinion on the working environment, so as to identify our strong points, as well as the ones to be improved. These elements, in combination with the Company's strategy, constitute the foundations for the development of action plans and targeted activities, aiming at the constant improvement of the working environment.

### **We respect diversity**

All cells of society - and our Group among them - reflect the diversity of its members. We employ a sound ratio of male and female employees, of all ages and from different regions. We make sure people with disabilities are harmoniously integrated into our workforce.

### **We communicate openly and systematically with our employees**

Two-way communication and systematic updates promote transparency and cultivate a common target mentality and orientation. Timely and targeted diffusion of information across all functions and levels is an integral part of COSMOTE's internal communication culture.

## **5. The Employees' conduct towards the Company**

### **We guarantee system & information security**

In our business, we manage information concerning employees, customers, shareholders and associates, on a daily basis.

It is our fundamental priority and commitment to safeguard and guarantee personal data and communications content protection. To this end, the company has adopted and implements security policies and procedures as well as strict control mechanisms and applications.

### **We respect the Company's resources**

We acknowledge our obligation to respect the Group's property and to cautiously manage the resources we are provided with to fulfill our tasks.

### **We avoid conflict of interests**

We acknowledge and timely report eventual personal interests that might conflict with our responsibilities and tasks or with the Group's interests and we take appropriate measures.

We do not tolerate graft, corruption or bribery.

## **6. Our conduct towards Customers**

### **We want to be the Customer's first choice**

Our aim is to be the Customer's first choice by cultivating an honest and trustful relationship with each and everyone one of them. We want to rank first in our Customer's heart and must consistently keep our promises at all levels, aiming at further consolidating their relationship of trust.

We acknowledge that, to accomplish our target, we must offer products and services that stand out for their quality and innovation, but also for their friendly and safe use.

### **We want our Customers to feel that we care**

We acknowledge that each Customer is unique and has different needs and expectations, the total and consistent satisfaction of which is our major concern.

We commit to listening to our Customers and ensuring their positive experience, striving to provide them with fast, friendly, reliable and integrated service at each contact, whether they reach us at our points of sale, through our call center or any other way they chose.

The service we offer to our Customers is closely linked to our commitment to respect the personality and individuality of each and every one of them. We keep in mind that in every personal contact with the Customer, as well as with the general public, we represent COSMOTE and responsibly commit to protect and reinforce the positive perception for our company's image and values.

### **We represent COSMOTE even outside work**

Our social environment knows that we work at COSMOTE. Our overall conduct contributes to the establishment of a positive perception for the company. Friends, acquaintances or COSMOTE customers who meet us outside work feel, they have directly contacted the Company. We must listen to them and take them into account, as if they had contacted us while at work.

## **7. Our conduct towards Shareholders & the Investors' Community**

### **We directly and reliably inform our shareholders and investors**

COSMOTE's shares trade in the Stock Exchange. As employees, we are aware of our obligation to serve our shareholders' interests and manage their assets with respect and good sense, aiming at generating added value.

We make sure that all our shareholders in Greece and abroad have indiscriminate and simultaneous access to the same information and we facilitate them to exercise their rights.

We offer our shareholders and the investors' community open, honest and timely information about our Company, its activities and financial position.

### **We implement sound corporate governance practices**

We protect our shareholders' interests, not only by respecting the effective institutional framework, but also by adopting sound corporate governance principles. We operate based on moral management and transparency principles and we implement procedures that regulate risk management and the observance of internal audit rules.

### **Accountancy**

All financial transactions of the company figure on its financial statements. COSMOTE books and data are kept with accuracy, provide all necessary information and comply with the actual national and international standards and authorities.

## **8. Our conduct towards Suppliers & Associates**

### **We respect our associates**

We treat our associates and suppliers in all countries of operation with respect and transparency. We give potential suppliers equal opportunities to establish a professional relationship with COSMOTE by selecting them based on objective criteria.

We trade in fair and reasonable terms.

We expect our associates to implement best business ethics' practices and not only to comply with laws and internationally established trade rules, but also to be socially and environmentally sensitive themselves.

## **9. Our conduct towards Competitors**

### **We respect competition**

As a company we operate within a competitive environment. We respect our competitors and adopt principles and practices of sound, fair and rightful competition, primarily for the Customer's benefit.

It is our belief that such conduct strengthens our customers' trust and wins our competitors' long-term appreciation.

## **10. Our conduct towards the Authorities**

### **We keep honest relations & promote our interests with resolution**

Decisions made by institutions and Authorities influence our Group.

We seek meaningful dialogue and make sure that decision – makers are properly and timely informed on our issues. We present our positions and opinions with substantiated arguments.

### **11. Our conduct towards the Media**

We encourage a continuous, honest and open dialogue with the media, providing them with information indiscriminately, responsibly and with transparency. Through them we aim to inform the public about the Group's activities in a timely and reliable manner.

### **12. Our stance towards the environment**

We respect the environment and use natural resources with caution. We detect, control, measure and monitor any potential impact our operations may have on the environment.

We aim to continuously enhance our environmental performance taking appropriate measures when required.

We greatly emphasise on the information dissemination and raising public awareness.

### **13. We implement the Code of Ethics**

The observance of the Code of Ethics constitutes an obligation for all of us.

We implement procedures in order to detect and report potential violations and take appropriate corrective measures.

Within the framework of the present Code of Ethics and the implementation of its principles and guidelines, essential policies and procedures have been adopted in order to report and detect violations of the Code. All employees have access to the abovementioned procedures and policies, while a copy is also available on the company's corporate website.