

A woman with short brown hair, wearing red-rimmed glasses and a yellow sleeveless top, is smiling and looking upwards. She is holding a tablet computer. The background is a lush green environment, likely a greenhouse, with many plants and some orange fruits visible. The text "NOVA Sustainability Report 2022" is overlaid on the top half of the image.

**NOVA**  
**Sustainability Report**  
**2022**

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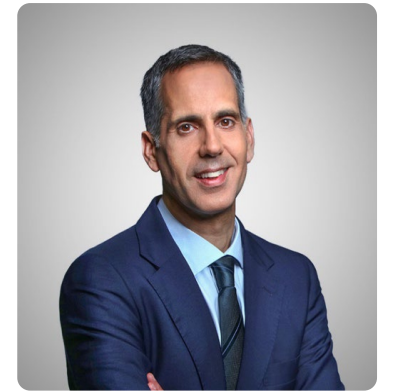
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# 1. CEO's Message

Dear friends and partners,

This Sustainability Report is the first report of the new Nova and concerns our footprint and actions for 2022, a year with significant challenges and successes, in highly demanding and highly competitive sectors such as telecommunications and entertainment. At the same time, it was the year in which the integration of Nova with Wind Hellas was completed, and the United Group's €2 billion investment plan in Greece was announced. We ushered in a new era for Nova, which culminated in early 2023 when we reintroduced ourselves with our new brand and made significant changes to the company's identity.



Nova is confident that access to the digital world should be a right for all, not a privilege of a few. It states that its offer will be based on authenticity, transparency, investments in modern infrastructure, and will focus on the citizen and the country. The company's goal is to reverse the current situation by offering the best of technology combined with the best possible price and experience to customers.

In this context, I would like to thank our people, who, all together, with a sense of responsibility, professionalism and dedication, played a decisive role in the consolidation, the launch of the new brand identity, the acceleration of the development of fiber for the home and 5G, further enhancing the competitiveness of the new Nova. This "together" is the cornerstone for the continuation of our successful course and the realization of our primary goal: To be a strong participant for the country's digital future, implementing infrastructure projects for the benefit of citizens, households and businesses and enhancing competition in the sector by offering quality products and services at the best possible prices.

At the same time, we continue with sustainable corporate development as a compass, to strengthen and expand our positive social and environmental footprint, implementing actions that contribute to the protection of the natural environment and the support of local communities on a regular basis and in times of crisis.

In the following pages you can read in detail the policies and actions of business and social responsibility of Nova and Wind Hellas for 2022. They are an account of our united and joint action as a single organization that is evolving and growing. In the new era, we design and shape the strategy and sustainable development program of the new Nova, based on substantive interventions that make a real difference in citizens' lives and leave long-term benefits to the environment and society.

**Wishing you an insightful read,**

**Panayotis Georgiopoulos,**

**CEO of Nova**

## 2. Nova-Wind at a glance

Nova is a member of the United Group, the largest telecommunications and media group in Southeastern Europe, and constitutes the provider resulting from the integration of Nova with Wind Hellas. In this Sustainability Report, the data refer to the companies Nova and Wind Hellas (Nova-Wind), but also to the goals set by the consolidated company Nova.

In the year 2022, Nova-Wind has 4.9 million subscribers in mobile and fixed telephony as well as pay-TV. The company continues to invest in the development of its infrastructure, to invest in new generation infrastructure, both in mobile telephony, fixed telephony and the Internet and to develop a state-of-the-art 10 Gigabit fiber optic network.

### 2.1 Overview of Companies

#### FINANCIAL PERFORMANCE

Description	2022
Turnover	793 m. €
Investments	250 m. €
Total capitalization by debt	593 m. €
Total capitalization from own funds	-198 m. €
Total assets	1.257 m €
Mobile, fixed telephony and TV RGUs	4.9 m.
Number of stores at the end of the period	314
Employees (FTEs)	1.447
Employees (Heads)	1.457

On January 12, 2022, Wind Hellas joins the United Group, through Newco United Group Hellas S.a.r.l., resulting in the completion of its integration activities with Nova's companies (Nova-Wind Telecommunications, Nova-Wind Broadcasting and NetMed Management & Consulting Services) on January 12, 2023. In accordance with the exemption provided for in paragraph 4(a) of IFRS 10 Consolidated Financial Statements, the new company has not prepared consolidated financial statements as of 31 December 2022. Therefore, the data for the year 2022 refer to the internal consolidated results of Nova and Wind Hellas, resulting from the monthly reports to the United Group.

#### Nova-Wind



**4,9** million mobile, fixed & pay-TV customers (RGUs)



**314** Stores throughout Greece

#### NETWORK



**98,3%** 4G population coverage



**61,2%** 5G population coverage

#### MANAGERIAL POSITIONS



**165** Managerial positions



**29,1%** Women in management positions

#### EMPLOYEES



**860** Men



**597** Women

#### ENVIRONMENTAL PERFORMANCE



Scope 1 emissions  
**4.021 tn CO<sub>2</sub>eq**

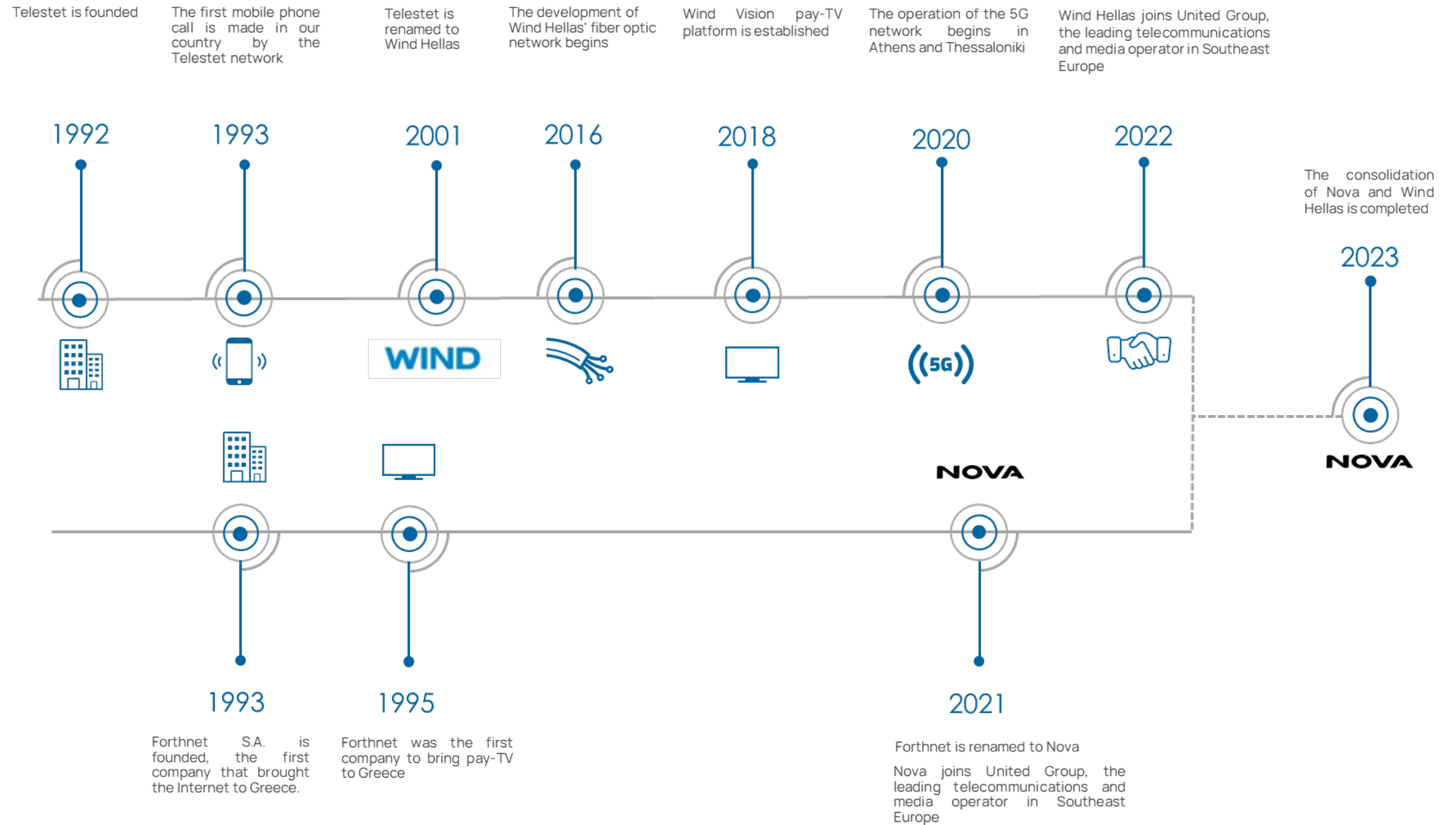


Scope 2 emissions  
**18.401 tn CO<sub>2</sub>eq**



Scope 3 emissions  
**6.593 tn CO<sub>2</sub>eq**

## 2.2 Milestones



## 2.3 Products & Services

Nova		Wind	
Individuals	Businesses	Individuals	Businesses
Fixed & internet plans	Corporate fixed plans, Internet & TV	Mobile - fixed plans	Mobile – contract plans
<ul style="list-style-type: none"> <li>2play ADSL</li> <li>Fiber 50</li> <li>Fiber 100</li> <li>Fiber 200</li> </ul>	<ul style="list-style-type: none"> <li>Nova-Wind 2play Professional</li> <li>Nova-Wind 2Play Professional Economy</li> <li>Nova-Wind 3Play Professional Economy Public View</li> <li>Nova-Wind Professional Public View</li> <li>Nova-Wind Professional Private View</li> <li>SDWAN</li> </ul>	<ul style="list-style-type: none"> <li>WIND ONE 3GB (50 MBPS)</li> <li>WIND ONE 10GB (50/100/200MBPS, 100/200FTTH)</li> <li>WIND ONE Unlimited GB (50/100/200MBPS, 100/200FTTH)</li> </ul>	<ul style="list-style-type: none"> <li>W Business Unlimited for Unlimited Talk</li> <li>W Business (x)GB</li> <li>XS Business</li> <li>Business Control 300</li> </ul>
EON TV		Card connection	Mobile business data plans – contract
<ul style="list-style-type: none"> <li>EON</li> <li>EON+</li> </ul>	<ul style="list-style-type: none"> <li>MyLink</li> <li>IN 800/801</li> <li>Premium Service (900)</li> <li>Short Codes</li> <li>Nova-Wind Business</li> <li>MyLink</li> </ul>	<ul style="list-style-type: none"> <li>Internet Leased Line</li> <li>WiFi</li> <li>DDos</li> <li>MPLS VPN</li> <li>Nova-Wind Lease Line</li> </ul>	<ul style="list-style-type: none"> <li>FREE2GO</li> <li>Q</li> </ul>
Combined programs	EON TV	Fixed & internet plans	
<ul style="list-style-type: none"> <li>EON ADSL</li> <li>EON Fiber 50</li> <li>EON Fiber 100</li> <li>EON Fiber 200</li> <li>EON+ ADSL</li> <li>EON+ Fiber 100</li> <li>EON+ Fiber 200</li> </ul>	<ul style="list-style-type: none"> <li>Nova-Wind Professional Public View</li> <li>Nova-Wind Professional Private View</li> </ul>	<ul style="list-style-type: none"> <li>WIND Double Play</li> <li>WIND Fiber (50,100,200)</li> <li>WIND Fiber to the Home (100,200)</li> </ul>	<ul style="list-style-type: none"> <li>WIND Business Data 10GB</li> <li>Business SimpleFi On The Go 4G</li> <li>Mobile Broadband</li> <li>Business SimpleFi 4G &amp; 5G</li> </ul>
		Mobile - contract plans	Fleet management programs
		<ul style="list-style-type: none"> <li>W 3GB</li> <li>W 10GB</li> <li>W Unlimited GB</li> </ul>	<ul style="list-style-type: none"> <li>WIND Fleet Management</li> </ul>
		Mobile Broadband Plans	Professional refrigerator management programs
		<ul style="list-style-type: none"> <li>SimpleFi on the Go (5/10/20/30 Gb) (contract)</li> <li>WIND Mobile Broadband (card)</li> </ul>	<ul style="list-style-type: none"> <li>WIND Freeze Alert</li> </ul>
		<ul style="list-style-type: none"> <li>Wind Vision, subscription service until December 2022:</li> <li>Family Pack</li> <li>Full Pack</li> </ul>	<ul style="list-style-type: none"> <li>Customer management and promotional programs</li> <li>WIND Marketapp</li> </ul>
			Corporate fixed & Internet plans
			<ul style="list-style-type: none"> <li>Business Fiber 50</li> <li>Business Fiber 100</li> <li>Business Fiber 200</li> <li>Business Fiber 100 FTTH</li> <li>Free number (800)</li> <li>One number (801)</li> </ul>
			<ul style="list-style-type: none"> <li>Business Internet Solutions</li> <li>Business Data VPN</li> <li>Business Connect</li> </ul>

## 2.4 Participation in institutional bodies, industry associations and committees

Participation in institutional bodies, sectoral associations and committees, contributes to the progress of the sector through the exchange of know-how and the promotion of sustainable development issues and enhances entrepreneurship and competitiveness of the country.

In this context, Nova-Wind is an active member in:

### Professional Agencies



Association of Mobile Telephony Companies (AMTC)



Hellenic Advertisers Association (HAA)



The Federation of Hellenic ICT Enterprises (SEPE)



Hellenic Federation of Enterprises (SEV)



Greek People Management Association (GPMA)



Organization for the collective protection of relative rights.

### Agencies for sustainable development



Hellenic Network for Corporate Social Responsibility (CSR Hellas)



BSE Council for Sustainable Development



Sustainable Greece 2020  
Sustainability Ambassador



Responsible Business Alliance (RBA)

## 2.5 Participation in conferences

### 2nd WOMEN FORUM – Diversity & Inclusion

We participated in the 2nd WOMEN FORUM – Diversity & Inclusion conference held under the auspices of the General Secretariat for Demographic & Family Policy & Gender Equality and the Hellenic Association of Women in Culture and Tourism.



### Economist “The Second Thessaloniki Metropolitan Summit”

We participated in the Economist conference “The Second Thessaloniki Metropolitan Summit” on “Europe in times of turmoil: Taking the vision for unity and solidarity to the next level”.



## 2.6 Distinctions

### The Most Sustainable Companies 2022

Wind Hellas has joined the group of “The most sustainable companies in Greece” for 2022. A distinction that confirms the Company's commitment to sustainable development with respect to people, society and the environment and its substantial contribution to the achievement of the United Nations Sustainable Development Goals (SDGs).





# 3. Sustainable Development



01

## Stakeholders

Communication with stakeholders to formulate the sustainability strategy.

02

## Materiality Analysis

Recording and inclusion of material issues that directly affect the company's activity

03

## Prioritization of Material Topics

The most material issues are highlighted

04

## Sustainable development Goals

Through the material issues, important goals of the company are set for the immediate future

### 3.1 Stakeholders

Nova-Wind identifies the Stakeholders who significantly influence the company's decisions and strategies but also who are directly or indirectly affected by its operation. For the determination of Stakeholders, the company is in constant communication with everyone involved and conducts research to confirm them.

Specifically, all Stakeholders in companies operating in the same sector as Nova-Wind were monitored and recorded. Therefore, 15 categories of Stakeholders were formed that belong either to the internal environment of the company or act in the external environment, Greek or international.

### Stakeholder Dialogue

In the context of dialogue with Stakeholders, Nova-Wind adopts a series of communication methods depending on the category to which they belong and the issues that concern / affect them. More specifically, regular meetings are held through which the expectations and priorities of those involved are communicated, conferences and workshops for their immediate information, as well as surveys in the form of questionnaires to record their views.

The results of meetings and interaction with Stakeholders are used in the process of analyzing the material issues of the Company. For the year 2022, they were asked to assess the materiality of these issues based on their own criteria. The process is presented in detail in the section "Materiality Analysis".



### 3.2 Materiality Analysis

#### Identification of Material Topics

Nova-Wind adopts a systematic approach to evaluate and integrate issues that have a direct impact on its activities and the decisions of its Stakeholders. This process includes various stages of analysis and research.

In the first stage, literature research and review of Sustainable Development Reports of companies operating in the same sector are carried out. This process helps in gathering information from similar businesses, both internally and externally, in order to define best practices.

A review of international and industry sustainability standards is then carried out, focusing on SASB standards related to telecommunications services. The goal here is to understand the requirements and apply them to create consistent sustainability reports.

Another step is to record issues arising from the Sustainable Development Reports of Wind Hellas and its stakeholders. This ensures that priorities reflect the real concerns and needs of stakeholders.

The last stage consolidates the updated list of material issues from the Sustainable Development Committee of Wind Hellas. This is done to ensure compliance and keep abreast of sustainability-critical issues for the company.

In this way, Nova-Wind seeks not only compliance with standards, but also constant adaptation to developments and needs of its environment.

The result of the above procedures is the recording of the list of 17 Material Issues:

A/A	Material Topics	SDGs		
1	Procurement practices			
2	Ethical practices and competition law			
3	Management of energy and greenhouse gas emissions			
4	Waste management/circular economy			
5	Environmental legislation			
6	Electromagnetic radiation			
7	Workers' health, safety and social benefits			
8	Employee training			
9	Diversity and equal opportunities			
10	Support for local communities			
11	Ensuring confidentiality, communication and personal data protection			
12	Quality of service			
13	Network investments			
14	Accessibility, affordability and customer service			
15	Rights and protection of children			
16	Innovation and digital transformation			
17	Labour rights			

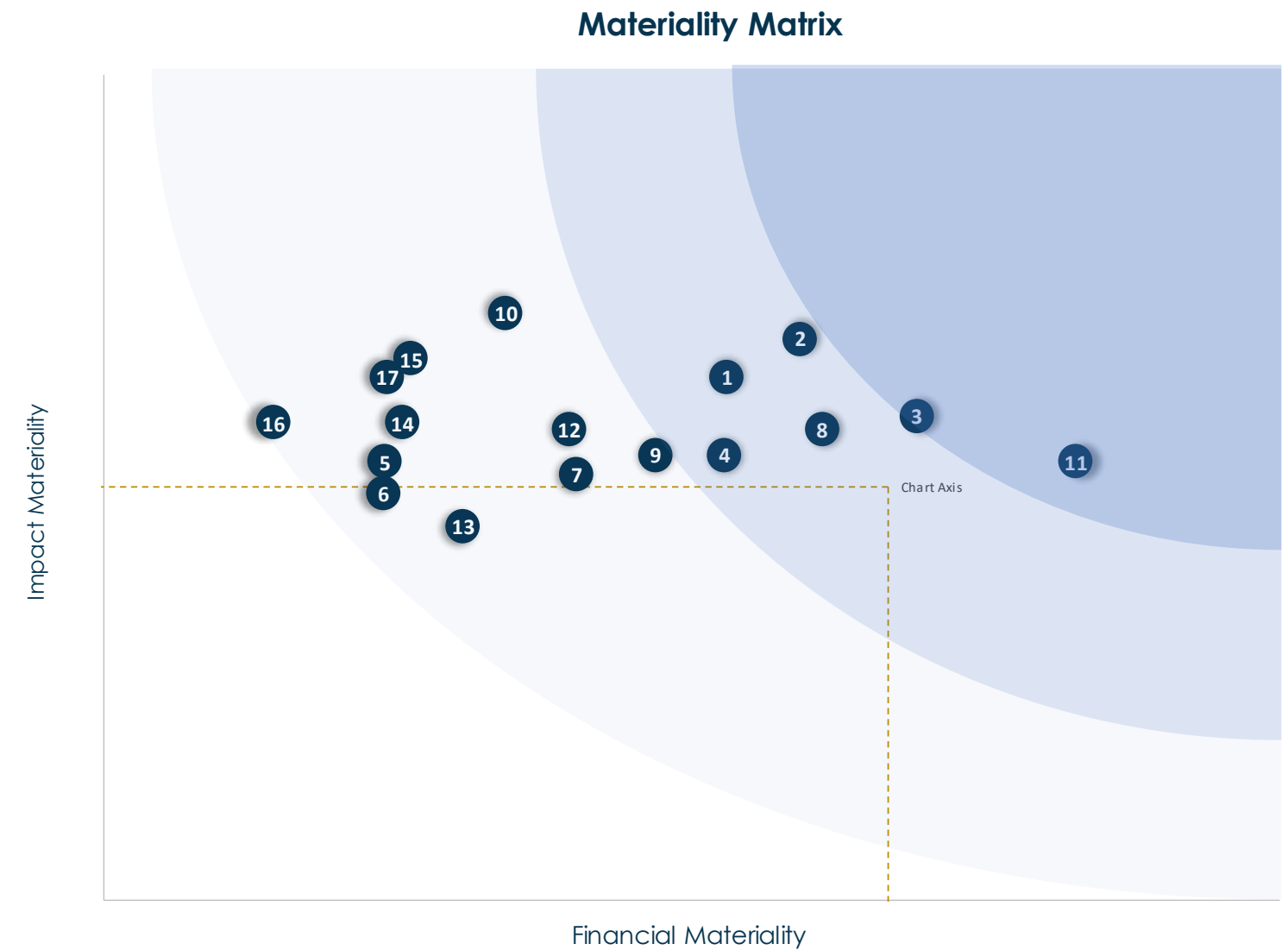
### 3.3 Prioritization of Material Topics and Double Materiality

Nova-Wind, having finalized the list of "Material Issues", proceeded to the compilation of an electronic questionnaire to the key Stakeholders, taking into account the double materiality approach and the European Sustainability Reporting Standards (ESRS), which refer to the European Directive 2022/2464, for sustainability reporting by companies, Corporate Sustainability Reporting Directive – CSRD. Specifically, two different questionnaires were created, one for Internal stakeholders (employees) and one for External stakeholders (e.g. customers, suppliers, and SMEs). This separation serves the method of double materiality as it evaluates both the "internal impact" of the material issues on the company's financial performance (financial materiality) and their impact on the environment and society (impact materiality).

#### Prioritization of Material Topics based on questionnaire results

The processing of the survey results, illustrated in the diagram, highlights the importance of the 17 Material Issues for Stakeholders. It is worth noting, however, that some of them were characterized as more essential. More specifically, the topic "Ensuring confidentiality, communication and protection of personal data" is considered to be the most essential for Nova-Wind, followed by "Management of energy and greenhouse gas emissions", "Employee training" and "Ethical practices and competition law". The material issues with the lowest response among Stakeholders for Nova-Wind are "Network Investments" and "Electromagnetic radiation". Without downplaying any material issue, Nova-Wind recognizes that all 17, with emphasis on the above, are an integral part of its responsible business approach.

Nova-Wind's Sustainable Development Report for 2022 covers all 17 material topics, with particular emphasis on the 4 that were assessed as the most material, both for the company's financial performance and their impact on the environment and society.



Material Topics			
1	Procurement practices	10	Support for local communities
2	Ethical practices and competition law	11	Ensuring confidentiality, communication and personal data protection
3	Management of energy and greenhouse gas emissions	12	Quality of service
4	Waste management/circular economy	13	Network investments
5	Environmental legislation	14	Accessibility, affordability and customer service
6	Electromagnetic radiation	15	Rights and protection of children
7	Workers' health, safety and social benefits	16	Innovation and digital transformation
8	Employee training	17	Labour rights
9	Diversity and equal opportunities		

### 3.4 Sustainable Goals for Nova-Wind

The materiality assessment process carried out through the distribution of questionnaires to Nova-Wind 's Stakeholders, contributed to the determination of essential goals for the company in the foreseeable future. In particular, the processing of the results formed a classification of material issues, mainly in terms of the magnitude of the positive impact they have on the environment and society, and furthermore in terms of the company's ability to react in case of negative effects on the environment and society for each issue separately.

Below is the list of the top five material issued assessed to have the greatest impact on the environment and society.

A/A	Material Topics with a significant impact on the environment and society
1	Procurement practices
2	Ethical practices and competition law
3	Environmental legislation
4	Employee training
5	Support for local communities

The output of the above list is the identification of new goals for the company, while their achievement contributes to the monitoring of specific material issues. The objectives that will be presented are based on ESG (Environment – Social – Governance) criteria and international sustainable development standards (GRI, SASB). Moreover, they align with the European Green Deal to achieve climate neutrality by 2050 and with the UN Sustainable Development Goals (SDGs) for 2030.

Nova-Wind's priority is the continuous integration of new objectives into its business operation in order to incorporate the principles of Sustainable Development. In this way, it creates value for all Stakeholders and encourages them to contribute directly to their achievement.








With the presentation of the objectives carried out below and their categorization in the pillars of Environment, Society and Governance, Nova-Wind is committed to the adoption of a strategy that will consist of initiatives and actions with an anthropocentric and environmental character.

The goals that have been set, as well as the description of their current situation, are fully aligned with the 17 Sustainable Development Goals, while the contribution to the majority of them is an integral part of the company's business approach.







### 3.5 Sustainable Goals and their progress





#### Environment

Goal	Current Status	SDGs
Reduction of electromagnetic radiation.	Attempt to reduce the electromagnetic radiation from the company's antennas.	
Reducing emissions by replacing 30% of the total fleet with electric, plug-in and hybrid vehicles.	54 cars have already been replaced, including electric and hybrid vehicles. The goal is in progress.	 
Use of technological solutions to protect the environment and biodiversity of Greece.	Within 2022, three programs were implemented (fire detection in the Syngrou grove, transport of medical equipment to the Small Cyclades, protection of Balkan samoy).	 
We recycle telephone sets and other electrical equipment.	We collect mobile phones and batteries in our stores and we also encourage our employees to bring items from home for recycling through a special program that covers devices of all kinds.	 

#### Society

Goal	Current Status	SDGs
Increasing employee training hours through participation in vocational training programs.	For 2022, the training hours were counted to 21,349 training hours.	
Increase volunteering hours in social and environmental initiatives	In 2022, two voluntary blood donations took place. The goal is in progress.	 
Strengthening existing and introducing new wellness programs.	The goal is in progress.	

#### Governance

Goal	Current Status	SDGs
Compliance with ESRS standards.	Alignment with specific standards has been achieved through the adoption of double materiality.	
Ensuring privacy of communication and protection of personal data.	For 2022, compliance audits were carried out to ensure communication privacy and personal data protection in the organization.	
Renewal of the Code of Business Conduct and Ethics.	The goal was achieved in 2022.	
Renewal of the Code of Conduct for Suppliers and Partners.	The goal was achieved in 2022.	

# 4. Governance



## WE STRIVE FOR TRANSPARENCY

We define our scope of action based on a strong ethical framework, committed to values, policies and codes that underline our commitment to responsible business. We embed high standards in our corporate governance to create value for our shareholders, customers, employees and suppliers.

## 4.1 Responsible Governance

We are committed to offering our customers high quality services at the best price. Our corporate values support the realization of our commitment, taking into account the wishes of our employees for a better working environment.

# Corporate Values



## Administrative Practices

Wind Hellas Telecommunications Single-Member Société Anonyme Commercial and Industrial Company, as well as Nova Telecommunications Single-Member S.A., Nova Broadcasting Single-Member S.A., and NETMED Management and Consulting Services Single-Member S.A., were anonymous companies. The supreme body of the aforementioned companies was the General Assembly of shareholders which, according to the companies' statutes, could decide on any matter concerning the companies.

## Board of Directors

The companies mentioned above were managed by the following members of the Boards of Directors consisting of three (3) to fifteen (15) members. In more detail:

### Composition of the Board of Directors of Wind Hellas as of 31.12.2022:

1. Nikolaos Stathopoulos, Chairman of the Board.
2. Panagiotis Georgiopoulos, Board Member.
3. Georgios Lambrou, Board Member.

### Composition of the Board of Directors of Nova Telecommunications as of 31.12.2022:

Nikolaos Stathopoulos, Chairman of the Board.

1. Panagiotis Georgiopoulos, Board Member.
2. Georgios Lambrou, Board Member.

### Composition of the Board of Directors of Nova-Wind Broadcasting S.A. as of 31.12.2022:

1. Nikolaos Stathopoulos, Chairman of the Board.
2. Kyriaki Silvestriadou, Vice Chairman of the Board.
3. Adela Petrovic, Board Member

### Composition of the Board of Directors of NETMED Management and Consulting Services Single-Member Société Anonyme as of 31.12.2022:

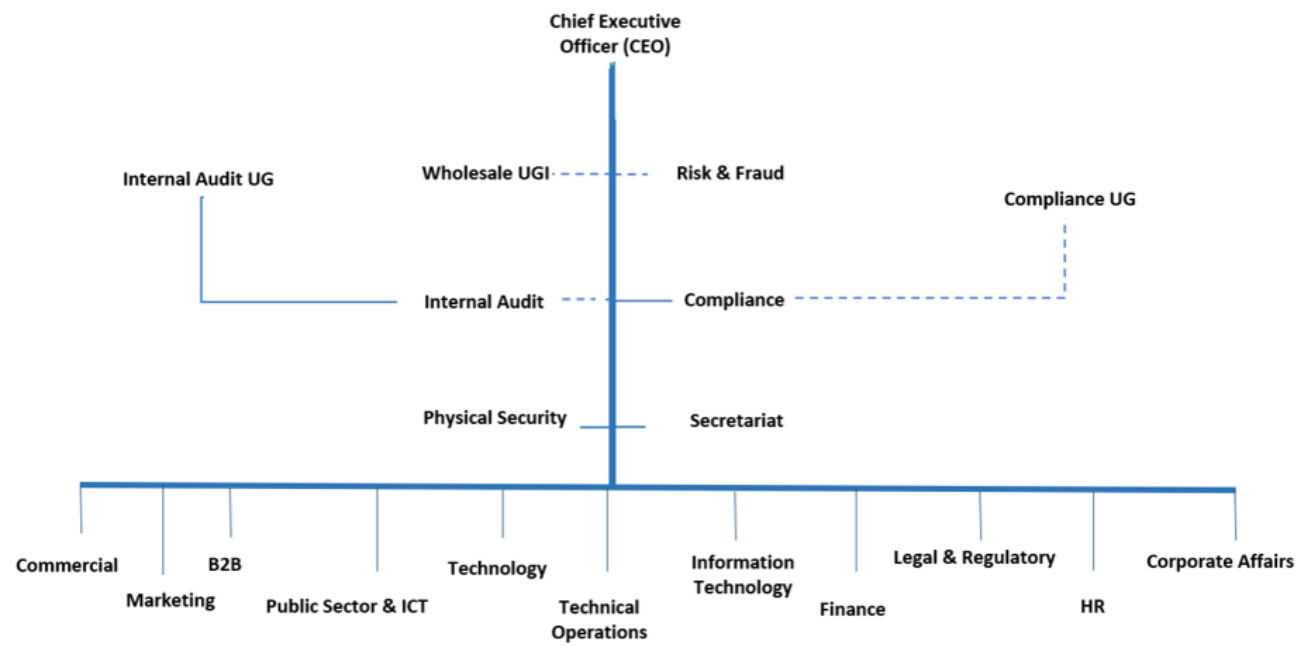
1. Panagiotis Georgiopoulos, Chairman of the Board & CEO.
2. Kyriaki Silvestriadou, Board Member.
3. Georgios Lambrou, Board Member.



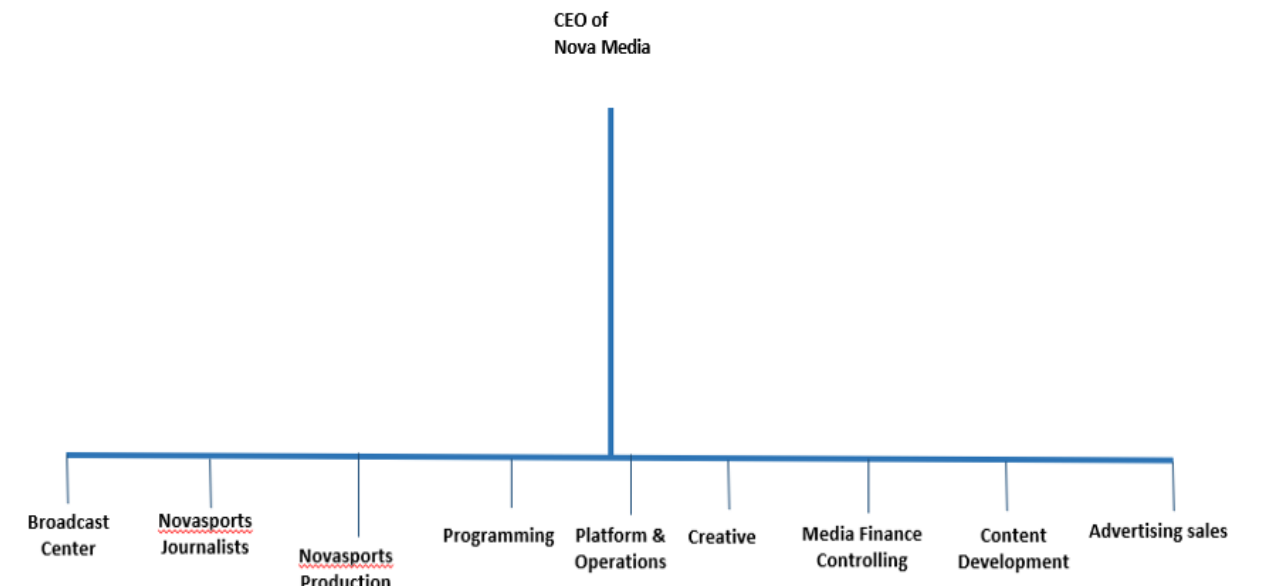


4.2 Organizational Chart

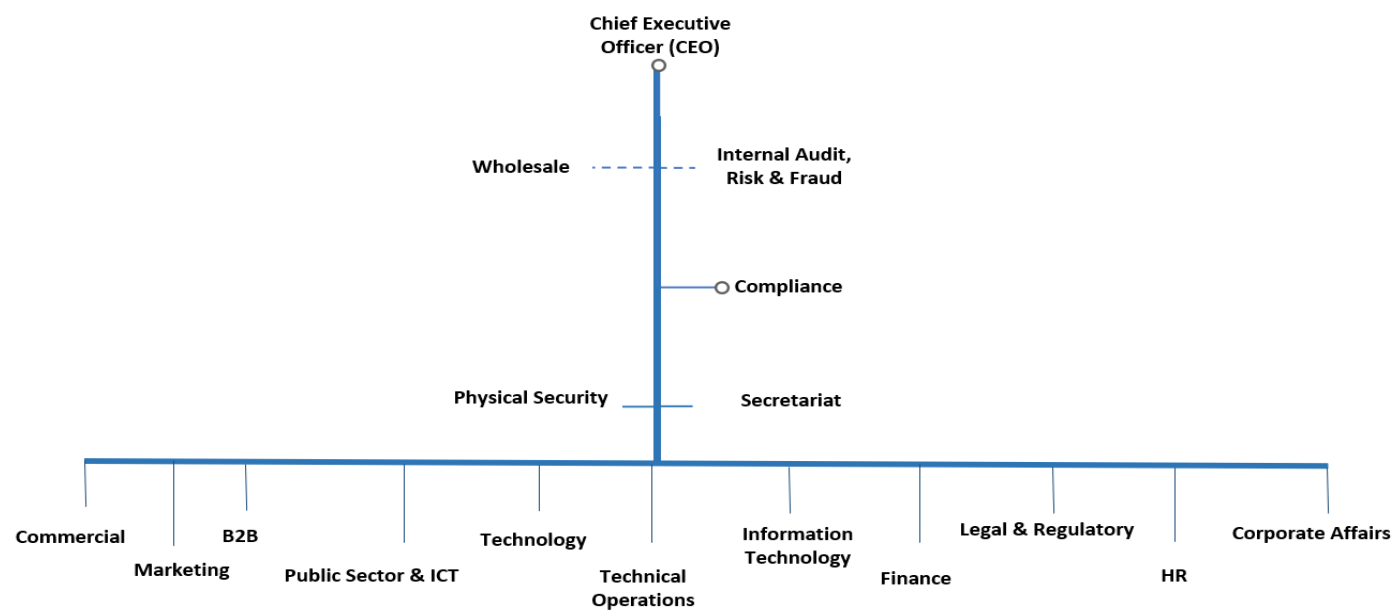
Wind Hellas Telecommunications



Nova Broadcasting



Nova Telecommunications



4.3 Communication with the Management

In order to define the strategy for the achievement of their investment plan both Wind Hellas Telecommunications Single-Member Société Anonyme Commercial and Industrial Company, and Nova Telecommunications Single-Member S.A., as well as Nova Broadcasting Single-Member S.A. and NETMED Management and Consulting Services Single-Member S.A., communicated with shareholders at regular intervals to promptly inform them about developments in the companies and the Greek market in general. The constructive and two-way communication also continued between the employees and the Board of Directors.

During the year, information meetings were held on a regular basis between the heads of departments and teams and between each supervisor and his/her work group, so that all employees were kept informed of the objectives, strategic priorities and results of the above-mentioned companies.

It is worth noting that, due to the acquisition of the Nova-Wind and Wind Hellas by the United Group, the management of the companies was common, as shown below by the composition of the companies' boards of directors and therefore the committees listed below were common to all four (4) companies and were not established separately for each of the legal entities listed below.

#### 4.4 The Committees

The activities of the Boards of Directors of Wind Hellas, Nova Telecommunications, Nova Broadcasting and Netmed, for the year 2022, were supported through the operation of the following committees:

##### Senior Management Committee

The Senior Management Committee is composed of the CEO and the General and Senior Managers, with responsibility for taking decisions on current issues of the Company. It takes important decisions in relation to the day-to-day operation and supervision of the Company, the resolution of problems and the formulation of individual strategies, always consistent with the decisions of the Board of Directors of the Company and its shareholders.

##### Investment Committee

The Investment Committee is a permanent committee of the management teams of the companies. The Committee is responsible for the ex-ante evaluation and approval or rejection of all major capital expenditures and investments of the companies, excluding financial investments. The Committee meets twice (2) a month or whenever deemed necessary and is composed of the Chief Executive Officer, the Chief Financial Officer and the Chief Supply Chain Officer.

##### Special Committee on Information Security & Personal Data Protection

The Special Committee on Information Security & Personal Data Protection aims to establish a corporate policy for information security and the protection of personal data, and its implementation by the employees of the companies. This is to ensure the confidentiality, integrity of information, and the protection of personal data. The committee serves as the central authority of the aforementioned companies in managing the information security policy and can propose corrective actions.

to maintain and enhance the information security control mechanisms through the company's processes and systems. The Committee's members include all members of the Senior Management Committee, the Data Protection Officer (DPO), and the head of the Information Security Department.



## 4.5 Our Policies

In order to ensure that we conduct our business activities in a respectful and responsible manner, we have established certain policies that are already in place. At the same time, we are committed to continuing to work to develop new policies, tailored to evolving needs, to ensure continuous improvement and protection of personal data, telecommunications privacy, and the environment. Below are the current Nova-Wind policies for the year 2022.

### Quality policy

Describes our commitment and values that apply across the range of our operations.

### Environmental Policy

We make efforts to protect the environment by adopting practices that reflect our commitment to sustainable business.

### Security Policy for Ensuring the Confidentiality of Communications

We demonstrate a strict commitment to confidentiality, both internally and in relationships with third parties, by ensuring the confidentiality of our communications.

### Policy on Protection of Reports and Non-Retaliation and Protocol for Investigation of Reports

To ensure compliance with legislation and high standards and to demonstrate our commitment to open and accountable management we have developed a Whistleblowing Policy that provides guidelines and protections for disclosing information about offences or breaches of the Code of Conduct within the work environment or in a context related to third party dealings with the company.

### Business Continuity Management Policy

We are committed to maintaining a continuous flow of high-quality services to our customers, even during critical periods that could adversely affect our business operations.

### Occupational Health and Safety Policy

We ensure the health and safety of our employees by creating a work environment that promotes well-being and safety.

### Privacy Policy

We maintain high standards of privacy protection, ensuring the privacy of our subscribers, users and employees in accordance with the GDPR.

### Sustainable development policy (ESG)

Every aspect of our business and operations follows the Principles of Sustainable Development. We recognize that improving ESG (Environmental-Social-Governance) areas is necessary for long-term growth and therefore we place particular emphasis on caring for the health and safety of employees, protecting the natural environment, meeting the needs of customers in an integrated manner and harmoniously coexisting with the local communities in which we operate. This policy has been adopted only by Wind Hellas.

## Internal Audit

The Internal Audit Department is responsible for providing independent and reasonable assurance to the Board of Directors that the internal control system ensures compliance with the Company's policies, practices and procedures. This is achieved by assessing the effectiveness of risk management systems, operational process controls and governance practices. Management is responsible for the design and operation of the internal control system, while departmental managers are responsible for establishing appropriate policies and procedures to help the Company achieve its stated objectives.



## 4.6 Strong Compliance and Ethics at Nova-Wind

Nova-Wind is consistently distinguished for its commitment to Ethical Conduct and Compliance with legal requirements, regulations and industry best practices.

During this challenging period, Compliance through 2022 played a key role in ensuring a smooth transition during the merger of companies by harmonizing compliance practices, policies and procedures.

We first updated the Code of Business Conduct and Ethics and the Supplier and Partner Code of Conduct. We made Compliance a priority and began work to enrich the newly created organization's Compliance Program and communicate it to everyone.

Within this time the main objective was to redefine the basic Compliance framework and the achievements were as follows:

- Renewal of the Code of Business Conduct and Ethics
- Ethics and Business Conduct Code of Conduct and Ethics Code of Conduct and Ethics Reporting Code of Conduct
- Effective Implementation of Compliance
- Compliance and Partners: Supplier and Partner Code of Conduct
- Renewal Plan for all Compliance Policies
- Training Plan Design - Compliance Culture

#### 4.6.1 Nova-Wind's Code of Business Conduct and Ethics

At Nova-Wind we all have an obligation to act with integrity in the performance of our duties. A key foundation of our success as an organization has always been ethical decision making, but with the new Nova-Wind, ethical behavior has had to be redefined. Nova-Wind's new Code of Ethics redefines the principles and high standards of conduct that are critical operating guidelines, both to protect us as employees and to ensure Nova-Wind's future success. Within the new Code, they include:

- Principles that guide the way we conduct our business activities in different areas of operation
- Practical examples to improve understanding
- Contact details of the Compliance department for seeking advice and clarification
- Guidance on how to safely raise a concern on the Support and Reporting Line

The content of the Code of Business Conduct and Ethics includes general guidelines on the basic principles and values of the company, supporting: human rights, equality and acceptance of diversity, zero tolerance of violence and harassment, health and safety as well as the labour rights of employees and finally the possibility for everyone to report incidents of unethical behaviour.

In addition, it commits the company to protecting the environment and local communities, protecting customer data, security of company property and information.

In terms of ensuring corporate integrity, it emphasizes the selection of only ethical suppliers and partners, healthy competition at all levels and zero tolerance of the company and all those working on its behalf to bribery and corruption.

For the ethical management of gifts, donations and sponsorships, the involvement of the Compliance Directorate ensures that procedures are enriched with control mechanisms and applied with transparency, objectivity and social criteria.

#### Support and Reporting Line

The Nova-Wind Code during the year was accompanied by a series of relevant procedures that were updated in accordance with the requirements of the European Directive and the local legislation Law 4990 on Whistleblowing:

Petition Protection and Non-Retaliation Policy

Frequently Asked Questions about the "Support and Reporting Line"

Petition Investigation Protocol

At Nova-Wind there is the Support and Reporting Hotline which is a confidential reporting tool for the use of any person (Nova-Wind employee or even third parties) who wants to make a report and is managed by an independent third party - NAVEX. Everyone who reports a genuine concern is always protected, in accordance with the Reporting and Non-Retaliation Policy and the Privacy Notice in the Support and Reporting Hotline.

The Nova-Wind Reporting Line has many different reporting channels, accessibility in many languages, two-way communication and anonymous reporting, and clear instructions and clarifications on how to submit a report. It was important for us to encourage anyone who has concerns about business operations to report the "wrongdoings" without fear, ensuring their safety and protection throughout the Reporting process.

In Nova-Wind one can access:

- through the website [unitedgroup.ethicspoint.com](http://unitedgroup.ethicspoint.com) or
- by telephone via your landline 800 000 0126 (Toll-free number from a landline)

- in the app with QR Code

Also, if there are any questions or if someone wants clarification on issues related to the Nova-Wind Code of Conduct, they can contact the Compliance Department at e-mail: [compliance@united.group](mailto:compliance@united.group).

#### Implementation of Compliance at Nova-Wind and Success

The compliance team managed the complexity of the merger process and the communication of the updated Compliance Rules with remarkable expertise and professionalism. The following elements contributed to the effective implementation of the compliance culture:

- **Moral Commitment:** Management support and "lead by example" played a key role in promoting an ethical culture through employee engagement and accountability at all levels.
- **Everyone's Commitment:** All employees from the two merging companies were actively engaged, aiming for a unified culture.
- **Cooperation & Contact:** The collaborative nature of our people is the driving force behind the success of the project.
- **Foresight:** We have actively monitored regulatory changes and adjusted our policies accordingly.
- **Digitization:** We leveraged digital transformation for proper and efficient compliance operations.
- **Emphasis on Culture:** We have cultivated and successfully continue to foster a conscious ethical mindset by ensuring that compliance is seen as an integral part of day-to-day operations.
- **"One Nova Team" and Compliance:** We embraced the opportunity to inspire the creation of "One Team" and shape a new culture of compliance with an emphasis on ethics, integrity, and accountability for all of us.
- **Continuous improvement:** The Nova-Wind Compliance Team and the company are committed to continuous improvement with a long-term action plan.

## Regulatory Compliance

### Renewal Plan for all Compliance Policies

In support of the basic principles outlined in the Code of Conduct and in order to better understand and apply them, the preparation of the renewal of the following individual Policies was started in the same year:

- Conflict of interest
- Acceptance and Offer of Gifts
- Sponsorships and Donations
- Anti-Corruption and Bribery Policy
- Third Party Due Diligence Policy

### Training Plan Design - Culture of Compliance

At Nova-Wind, our dedication to continuous improvement has ensured that Compliance is at the forefront of the organization's operations and will continue to be a strategic priority for the company until our vision of a Compliance Culture becomes a reality in its entirety.

It is certain that only through continuous training and vigilance can we ensure that we create this Culture of Compliance and therefore, immediately after the launch of the new Code of Business Conduct and Ethics, the preparation of the training material on it was started and it was decided to carry out the first training in the new company with a time horizon of early next year.

The Nova-Wind Code of Conduct training initiative was designed to foster and sustain a culture of compliance, integrity and ethical behaviour in the long term, and management believed in this project, approving the repetition of this training every year thereafter.

### Zero- Tolerance to Corruption

One of the inviolable principles of Nova-Wind's Code of Conduct is that we uphold Responsibility, Ethics and Integrity and act with honesty, transparency and respect.

At Nova-Wind we are committed to zero tolerance of corruption and will even choose to lose a sale or partnership if the only means of securing it is through bribery, facilitation payments, accepting or offering kickbacks, or an unacceptable financial transaction. We comply with anti-bribery and anti-corruption laws and regulations and support efforts to eliminate them globally. Offering or giving any preferential treatment to a government official, customer or other third party to obtain an advantage over an offer is bribery and is strictly prohibited for all.

To prevent bribery and corruption, we act as follows:

- We do not solicit, accept or offer bribes/favourable treatment of any kind in return from anyone.
- We do not provide "gifts" to individuals in order to influence their decisions.
- We are very careful about what we offer or accept from anyone involved in a bidding or approval process.
- We do not offer anything to a current or former government official without approval from Compliance.
- We never make a payment to expedite a routine procedure.
- We only choose and work with ethical, reliable and qualified third parties.
- We don't hire a third party to do something that we could not morally or legally do ourselves.

Specifically, to combat and prevent bribery and corruption, immediately after the successful communication of the Code of Business Conduct and Ethics, the preparation of the renewal of the Anti-Corruption and Bribery Policy and the creation

of additional policies, procedures and control mechanisms for the proper management of Gifts, Donations and Sponsorships began.

### Gifts, Entertainment and Travel

We are confident that all gifts, hospitality, entertainment and travel are in good faith, offered occasionally, reasonably and in a proper manner, and are not intended to influence the recipient's decision-making or unethically gain any business advantage. We offer or accept participation in entertainment or travel only if there is purely a business purpose and subject to prior approval by the company's Compliance Officer or United Group's Chief Compliance Officer.

### International Sanctions Policy

Nova-Wind's Supplier Code is framed by the International Sanctions Policy, which ensures compliance with international sanctions regulations and avoids cooperation with restricted entities. The tool we use is a powerful Navex solution that provides real-time access to global lists of sanctions and negative reputation incidents, including those issued by governments, international organisations and regulatory bodies.

The Supplier Code of Conduct and supplementary policies are accessible to all employees of our Company via the Intranet and to any interested party on the Company's website. Employees of the procurement and legal departments have been properly trained in the implementation of the process and the proper use of the tool.

### Conflict of interest

Nova-Wind has defined the framework in which the existence of a conflict of interest is recognised and appropriate measures are taken to avoid situations that could affect the decision-making process. This framework ensures the transparency and integrity of decisions, protecting corporate ethics and ensuring that choices are made in the public interest and free from influences that could distort the decision-making process.

### Policy on preventing and combating violence and harassment

Nova-Wind applies a zero-tolerance policy to any incident of harassment and sexual harassment in the workplace. All forms of violence and harassment, whether related to or arising from work, including gender-based violence and harassment and sexual harassment, are absolutely prohibited for every employee and partner of the company. Respect for human dignity, at all levels, is a key element of Nova-Wind's culture.

### Fair competition

Nova-Wind complies with national and European regulations for the protection of fair competition. Competition protection laws (anti-monopoly laws) prohibit agreements between competitors that prevent, restrict or distort competition.

### Corporate Risk Management (Risk Assessment)

As part of our commitment to effective governance, at Nova-Wind we have recognised early on the importance of risk management at group and entity level. In today's dynamic business environment, structured risk management is essential to identify potential risks and opportunities in the company's operations. By adopting a systematic approach, we aimed to achieve its defined strategic objectives while adding value to our shareholders. Realising the importance of Risk Management, during this year work was initiated to establish a group-wide risk committee, update the methodology to meet the needs of the new Nova and establish a revised Risk Management Policy to identify risks at the group and local company level. Our primary objective is to create and protect corporate value and reputation. Through strong risk management practices, we will be able to proactively address potential risks, take advantage of opportunities and optimise the company's decision-making processes and day-to-day operations. The Risk Management project is expected to be completed by the end of next year.

## 4.7 Compliance with Partners: Supplier and Partner Code of Conduct

Ethics and Integrity is a priority for us and that is why we tried to bring as many people as we could, including our suppliers and partners, on this journey. The compliance work at Nova-Wind focused on two pillars:

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- In the effort to create a strong compliance program so that we can influence our partners to follow the same compliance principles, not only with us but also with global International Organizations. The result was the creation of the Supplier and Partner Code of Conduct and our participation in the Responsible Business Alliance (RBA).
- In establishing a systematic and effective approach to evaluating suppliers in order to have ethical partners, the International Sanctions Policy was created and successfully implemented.

### Supplier Code of Conduct

In 2022, a new Supplier and Partner Code of Conduct was created, which outlines our expectations and requirements regarding ethical business practices, social responsibility, environmental sustainability and compliance with applicable laws and regulations. In addition, we have created a Compliance Annex in which we set out the key ethical principles we want our suppliers and partners to have and commit them to including them in all new contracts signed.

### The alliance with the RBA

The organization is a member of the RBA (Responsible Business Alliance) from November 2022. These commitments are the essential responsibility of all of us to build a responsible corporate culture, crucial to our own and society's long-term well-being. The RBA Alliance (<https://www.responsiblebusiness.org/>) is the world's largest industry association dedicated to responsible business conduct in global supply chains. By joining, we commit to abide by the RBA Code of Conduct and standards, accept responsibility for continuous improvement, and spread this commitment throughout our supply chain.





## Codes for Consumers

Consumers are protected by the codes established by the National Telecommunications and Postal Commission (EETT):

- Code of Conduct for the Provision of Electronic Communications Services to Consumers (EETT Decree 488/82/30-7-2008), as in force.
- Code of Conduct for the Provision of Multimedia Information Services (EETT Decision 578/29/15.10.2010), as amended by Decision 578/29/15.10.2010. EETT 923/12/17.02.2020.

In addition, the Company fully applies and binds third contractual parties that provide Multimedia Information Services for the application of codes relating to the protection of minors, namely:

- Code of Conduct for value added services via mobile phones and the protection of underage users.
- European Code of Conduct on safer use of mobile phones by children and young adolescents, concluded and implemented between Mobile Telephony Service Providers

## Intellectual property, copyright and related rights, confidentiality of communications and personal data

In our contracts with the public, we consistently incorporate strict conditions on the protection of intellectual and industrial property rights. These terms prohibit our customers from using our services in a way that violates intellectual property laws, with such a violation carrying the risk of contract and service termination. In addition, we have entered into contracts or are in negotiations with local Collective Management Organizations for Copyright and Related Rights to pay the required royalties and to implement joint actions to raise awareness of internet piracy and the resulting damages to copyright holders. Finally, we are fully compliant with our legal obligations as providers of electronic communications networks and services, ensuring the confidentiality of communications and personal data through the implementation of a comprehensive set of security rules, policies and procedures.

## Personal Data

At Nova-Wind, we take the protection of the personal data of our subscribers, employees and partners with the utmost seriousness. We strictly follow the legal framework for the protection of privacy and personal data, taking the necessary technical and organizational security measures. We implement Privacy Policies and have an internal Data Protection Officer, in accordance with the General Data Protection Regulation (GDPR). Regarding the collection of personal data, we ensure that it is always appropriate, relevant, necessary, and proportionate for the purposes of processing, ensuring that it is regularly updated where necessary. We also ensure that any requests from our subscribers regarding the processing of their personal data are met promptly, by having appropriately trained staff assist them.

## 4.8 Certifications<sup>1\*</sup>

The company has developed, implemented and certified a number of management systems. The ISO certifications held by the company are presented below.



### Quality Management

A quality management system is implemented, which covers all the Company's facilities, in accordance with the international standard ISO 9001, and its scope includes:

- Design, Development, Implementation, Operation, Support and Maintenance of Telecommunications and Information Systems Infrastructure, Telecommunications and Data Networks, Information Systems and Applications.
- Design, Development, Monitoring, Control and Support of the Wind store chain.
- The implementation of the quality management system includes:
  - o The Sale of Mobile and Fixed Telephony and Internet Services (Wind Mobile, FREE2GO Prepaid, Q Prepaid, -Wind Fixed Telephony and Internet).
  - o The Retail Sale of Mobile and Fixed Telephony Devices, Electronic Equipment and Accessories.
  - o The Repair of Mobile Telephony Devices.
  - o After Sales Service for Private and Corporate Customers.

<sup>1\*</sup> For 2022, the ISO certifications concern the management systems of Wind Hellas. Nova, aiming at continuous improvement and quality, adopts good practices and strives for the respective certifications.





## Business Continuity Management

At Nova-Wind we recognize and accept the necessity and responsibility for the creation and adoption of a Business Continuity Management framework, which we have developed in accordance with the international standard ISO 22301 - Societal security - Business Continuity Management System - Requirements and the regulatory obligations governing the Greek market, while at the same time we implement our commitment to our customers, employees, shareholders and suppliers.

In this context, Nova-Wind is certified with the aforementioned international standard ISO 22301:2019 since April 2017, so that we can continue all our critical operations and provide uninterrupted critical services to our customers in the event of an incident that could negatively affect important business units, systems and services.

- For this reason, we have developed a Business Continuity Management system under which we have defined and prioritized the critical functions, activities, infrastructure and services of our Company, as well as the resources that can be activated at any time.
- In addition, we have identified and assessed any operational risks and taken all necessary measures to mitigate their impact on Nova-Wind's daily operations, implementing strategies and solutions that enhance the resilience of the organization.
- At the same time, we continuously develop, implement, test, maintain and monitor these Business Continuity, Crisis Management and Communication Plans.

## Health and Safety at Work

We implement ISO 45001 occupational health and safety management system, the scope of which includes:

- Design, Development, Provision, Sale and Support of Integrated Telecommunications Products and Services (Mobile and Fixed Telephony, Data, Internet and Broadband) for Individuals and Corporate Customers.
- Design, Development, Implementation, Operation, Support and Maintenance of Telecommunications and Information Systems Infrastructure, Telecommunications and Data Networks, Information Systems and Applications.
- Design, Development, Monitoring, Control and Support of the Wind store chain.
- After Sales Telephone Service for Private and Corporate Customers

## Environment and Energy

An environmental management system is applied to all activities in accordance with the international standard ISO 14001.

The scope of application covers:

- Design, Development, Provision, Sale, Pricing and Support of Integrated Telecommunications Products and Services (Mobile and Fixed Telephony, Data, Internet and Broadband) for Individuals and Corporate Customers.
- Design, Development, Implementation, Operation, Support and Maintenance of Telecommunications and Information Systems Infrastructure, Telecommunications and Data Networks, Information Systems and Applications.
- Design, Development, Monitoring, Control and Support of the Wind Store Chain.
- The implementation of the system in Wind stores includes:

- The sale of Mobile and Fixed Telephony and Internet Services (Wind Mobile, Q Prepaid, Wind Fixed Telephony and Internet).
- The Retail Sale of Mobile and Fixed Telephony Devices, Electronic Equipment and Accessories.
- The Repair of Mobile Telephony Devices.
- After Sales Service for Private and Corporate Customers.

In addition, we also apply an ISO 50001 Energy Management System in our energy-intensive facilities with a certification scope that covers the operation of data and switching centers as well as the administration offices.

# 5 .Society



## WE INVEST IN PEOPLE

Nova-Wind's commitment is the uninterrupted connectivity of people in the digital world without restrictions and discrimination. In order to offer high quality communication and service to its customers at all levels and at all points of contact, it systematically invests in its people. It acts as a responsible employer, ensuring excellent and modern working conditions and competitive benefits. Continuous training and professional development opportunities for its people are self-evident prerequisites for the steady development and progress of the Company itself.

## 5.1 We support local communities and help create the digitally responsible citizens of tomorrow

Nova-Wind's commitment is the continuous and practical support of local communities in order to improve the quality of life of those in need.

### Social Actions

#### 12 years of educating digitally responsible citizens through the Kids@Safety programme

The Kids@Safety programme aims to create a safe online environment for children and sets the foundations for tomorrow's responsible digital citizens. It helps parents and guardians to prepare and guide their children to adopt safe online behaviour and train them to learn to recognize and avoid potential risks. Through advice on the correct use of the internet and encouraging dialogue between minors, parents, guardians and teachers, the programme also promotes the positive aspects of new technologies and critical thinking. The project is in cooperation with the Hellenic Police and the Cyber Crime Unit. Since 2011, Wind Hellas has been actively supporting the Cyberkid action as the exclusive sponsor of the CYBERKID mobile application and the website [www.cyberkid.gr](http://www.cyberkid.gr). The CYBERKID mobile application enables children, through the SOS-Cyber Alert Line, to communicate directly (touchscreen call) and in real time in case of danger or threat, with officers.

During the year 2022, Nova-Wind in collaboration with the Benaki Museum carried out two actions in the Greek islands to raise awareness among students about the benefits of connectivity offered by technology. The first took place on the island of Anafi, with a digital tour of the anniversary exhibition "1821 Before and After", while the second took place in Schinoussa, where the students attended the Benaki Museum's programme "Museum and Classroom in Live Connection!". Both actions, within the framework of the Kids!@Safety program, support Nova-Wind's effort to inform and protect students from potential online dangers. The Kids@Safety programme aims to create a safe online environment for children and sets the foundations for tomorrow's responsible digital citizens. It helps parents and guardians to prepare and guide their children to adopt safe online behaviour and train them to learn to recognize and avoid potential risks. Through advice on the correct use of the internet and encouraging dialogue between minors, parents, guardians and teachers, the programme also promotes the positive aspects of new technologies and critical thinking. The project is in cooperation with the Hellenic Police and the Cyber Crime Unit. Since 2011, Wind Hellas has been actively supporting the Cyberkid action, as the exclusive sponsor of the CYBERKID mobile application and the website [www.cyberkid.gr](http://www.cyberkid.gr). The CYBERKID mobile application enables children, through the SOS-Cyber Alert Line, to communicate directly (touchscreen call) and in real time in case of danger or threat, with officers.



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## Support for the City of Athens Reception and Solidarity Center



Wind Hellas aims to reduce inequalities and empower vulnerable groups through connectivity, so that everyone can claim equal participation in the digital future. In this context, Wind Hellas for the second year continues to show its support to the "Streetwork" team, which reaches out to vulnerable social groups, maps the homeless people living in the city, records their needs and informs about their reception structures and programmes.

## Transport of medical supplies via drone in the Small Cyclades



In October 2022 Nova-Wind in cooperation with the Greek company UCANDRONE implemented an innovative program for the Greek reality. The project involved the transport of pharmaceutical and health material via drone to small, inhabited islands of the Cyclades to enhance the health services offered to the residents. In particular, the lack of pharmacies on most islands creates increased needs for residents, while public health centers face significant shortages. The action lasted four months with the drone flying daily from the island of Naxos to the small islands of Koufonissi, Irakleia and Schinoussa. The project used 5G technology and developed artificial intelligence models through data aggregation from various sources, while at the same time exploring operational issues in order to better serve the needs of each island and ensure a guaranteed level of service. The project has demonstrated significant short and long term benefits to local communities, residents, the national economy and the environment, as the use of the drone reduces the cost of transportation and the corresponding energy footprint, but mainly provides first aid to residents in need.

## We respond to emergencies

### Humanitarian aid to Ukraine

Nova-Wind provided humanitarian aid to the war-affected people in Ukraine. The action was carried out through the non-profit organization "All Together We Can" and included, among other things, the collection of basic items from the employees of the two companies. In addition, the two companies offered free calls to and from Ukraine for their mobile and fixed-line subscribers, thus facilitating communication for those directly affected by the consequences of the war.

### Free communication services

In an effort to contribute to the response to emergency incidents, we offered free telecommunications services to subscribers in the fire-affected areas in Attica. At the same time, the National Network Management Center and technicians worked intensively to restore damage to both the mobile and fixed network and internet network, in cooperation with the Ministry of Climate Crisis & Civil Protection and the competent state authorities.

### Donation to the Fire Brigade of Greece

In May 2022 Nova-Wind, in view of the fire season, donated to the Hellenic Fire Brigade, which included a 4x4 fire truck and additional technical equipment for the fire truck.

### Easter Bazaar for the Brave Children of ELEPAP

Nova-Wind employees made their Easter purchases at a special bazaar of ELEPAP held at their headquarters, but also online through the e-shop ARTeμείζ. The aim of the action was to strengthen the work of ELEPAP, so that every child with disabilities, wherever they live in Greece, can have the support they need and deserve. The employees of both companies helped the brave children with disabilities through their purchases, as all proceeds contributed to the work of ELEPAP, while the amount raised was doubled and offered for further support.

### We stand by the children of the "Christodoulou Foundation for the Protection of Children" and "Hippocampus for the Disabled"

At the "Christodoulou Foundation for the Protection of Children", the non-profit foundation that offers shelter to girls who for various reasons have found themselves in a disadvantaged position aiming at their smooth integration into society, Nova-Wind financed the heating of their premises during the winter months. In addition, at a special event held at the premises of the institution, the company's employees surprised the boarding girls by offering them personal gifts, as well as a subscription to the new EON entertainment platform, to make their everyday life more enjoyable.

At the same time, since 2017, Nova continues to support the sports and cultural association "Hippocampus for the Disabled", covering part of the salary of its special educators who help children with special needs to develop their skills through artistic and sports activities.

### We offer our expertise and network for environmental protection

The Balkan chamois is one of the country's endangered animals. Wind Hellas, aiming at the protection of the species, has put its network and its expertise in the protection of the environment and the Greek fauna of the North Pindos Park.

### Pilot Fire Detection Program at Sygrou Park

Nova-Wind, in cooperation with Huawei and PROBOTEK, implemented an innovative early warning program for fire in Sygrou Park. For its implementation, sensors, drones and a high-speed 5G network, which was provided by Nova-Wind, were used in order to detect fire outbreaks in time.

The deployment of this program significantly reduces the chances of a fire and in case of its occurrence, the Control Centre is immediately informed through the camera on the drone.



### Social Product

At Nova-Wind we believe that technology can be of help to vulnerable social groups. By putting our beliefs into practice, we help to meet their telecommunication needs, aiming to reduce social isolation.

### Support Lines

#### PROVIDE service from Wind Hellas

It is a joint initiative of all three mobile phone companies in Greece, which was launched in February 2006 and has a charitable character.

The service involves the activation of a common five-digit number, for a certain period of time, to which mobile subscribers can send as many text messages as they wish (cost €1 + VAT), thus financially supporting one Non-Profit / Non-Governmental Organization at a time. The total net revenue received (excluding VAT), resulting from the use of the service is attributed by the companies to the organisation or institution that organised the charitable action, without any deduction of income. The "Offer" service was not used in the year 2022.

**SOS Children's Villages** We give our subscribers the opportunity to donate 2,016€ to SOS Children's Villages. by sending an SMS to 19820 to donate 2,016€. In 2022, 1. 494,85€ (not including VAT) were paid through the contribution of Nova-Wind subscribers.

#### Smile of the Child

We give our subscribers the opportunity to donate 2€ to the Smile of the Child by sending an SMS to 19810. In 2022 13. 793,60€ (not including VAT) were paid through the contribution of NOVA-WIND subscribers.

#### Kivotos tou Kosmou

Our subscribers can donate 2€ or 2,016€ respectively to the Kivotos tou Kosmou by sending an SMS to 19888 or 19828. A total of 5. 485,65 € was paid in 2022 (not including VAT).

#### P. O. S. E. A.

We give our subscribers the opportunity to donate 2,00€ to the NGO P. O. S. E. A. by sending an SMS to 19823. In 2022 18,70€ (not including VAT) were paid

#### ELEPAP

By sending an SMS to 19811, we give our subscribers the opportunity to donate 2€ to ELEPAP. In total, in 2022, 464,10€ (not including VAT) were paid.

#### AGALIA

We give our subscribers the opportunity to donate 2€ to the NGO Agalia by sending an SMS to 19829. The 2022 144,50€ (not including VAT) were paid.

#### LAMPSI

We give our subscribers the opportunity to donate 2,016€ to the NGO Lampsi by sending an SMS to 19833. In 2022 456,01€ (not including VAT) were paid.

#### NOSILIA

We give our subscribers the opportunity to donate €2. 00 to the Nosilia by sending an SMS to 19827. In 2022, 6. 80€ (not including VAT) were paid.

#### Make a Wish

We give our subscribers the opportunity to donate 2€ to Make a Wish by sending an SMS to 19808. In 2022, 462,40€ (not including VAT) were paid.

#### Union Together for Children

We give our subscribers the opportunity to donate 2,016€ to Union Together for Children by sending an SMS to 19805. In 2022, €217. 73 (not including VAT) was paid.

#### Together we can

We give our subscribers the opportunity to donate 2,016€ to All Together We Can by calling or sending an SMS to 19817. In 2022 3. 352,17€ (not including VAT).

#### Act of Kindness

We enable our subscribers to donate 2,016€ to the Act of Kindness by sending an SMS to 19825. In 2022, 7.511,98€ (not including VAT) were donated.

#### Food bank

We enable our subscribers to donate 2,00€ to the Food Bank by sending an SMS to 19803. In 2022, 8,50€ were donated (not including VAT).

## **FLOGA**

We enable our subscribers to donate 2,94€ to Floga by sending an SMS to 19813. In 2022 99,99€ (not including VAT) were donated.

## **AMYMONI**

We give our subscribers the opportunity to donate 2,016€ to AMYMONI by sending an SMS to 19819. In 2022 1,72€ (not including VAT) were donated.

## **ELIZA**

We enable our subscribers to donate 2,016€ to ELIZA by sending an SMS to 19800. In 2022 702,85€ (not including VAT) were donated.

## **Asylo Aniaton**

We enable our subscribers to donate 2,016€ to Asylo Aniaton by sending an SMS to 19809. In 2022 6,86€ (not including VAT) were donated.

## **IASIS**

We enable our subscribers to donate 2,016€ to IASIS by sending an SMS to 19814. In 2022, 3,43€ (not including VAT) were donated.

## **THEOPHILOS**

We enable our subscribers to donate 2,016€ to THEOPHILOS by sending an SMS to 19855. In 2022 6,86€ (not including VAT) were donated.

## **Helplines**

### **"Amber Alert Hellas"**

Our customers, through our telecommunications network throughout Greece, can actively participate in the process of locating a missing or abducted child by sending an SMS to 1056 from their mobile phone.

### **"European helpline for children"**

We support the European child helpline 116000, through which cases of missing children can be reported easily, quickly and free of charge, or assistance can be given to children in need. 11600 now also works for free SMS.

## **Emergency lines**

We offer free calls to emergency numbers such as 100, 166, 199, 112, 197 and 108, even in case of blocked calls due to debts. These numbers are toll-free, in accordance with the National Numbering Plan and the relevant regulatory framework.

## 5.2 Human Resources



Nova-Wind's priority is to ensure safe and modern working conditions for all employees, which will allow them to develop their skills and evolve them. Systematic training of human resources is an integral part of the company's steady development and progress.

Nova-Wind employees actively participate in voluntary activities and community service programmes, thus contributing both to their personal development and to the creation of value for society.

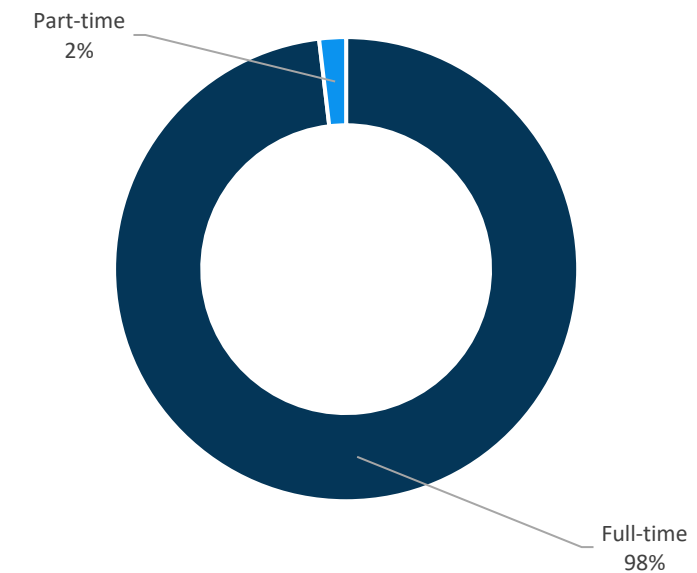
Furthermore, diversity and equality in the workplace are important factors in ensuring a healthy working environment and consequently the company's efficiency and success. Therefore, Nova-Wind takes care to combat incidents of discrimination by recording them and taking immediate action to address them. Inclusion of employees is ensured through the recruitment of people with disabilities, providing them with the necessary means to showcase their talents and abilities.

The promotion of an inclusive and non-discriminatory corporate culture represents a fundamental principle for the operation of the company, oriented towards enhancing equality and diversity in the workplace. The incorporation of these principles in the Code of Conduct highlights the Company's seriousness in supporting diversity and equality.

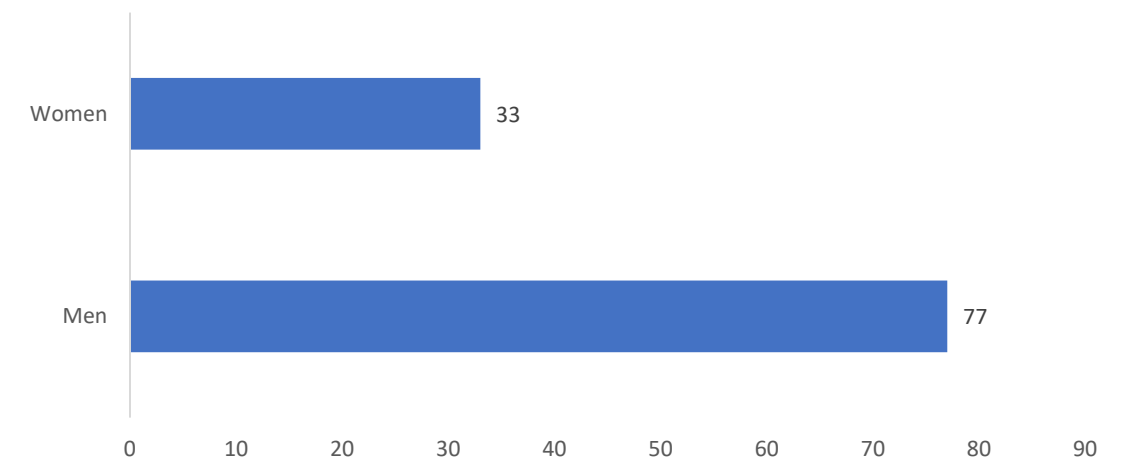
Workplace rights are fundamental and irreplaceable elements that guarantee human dignity, equality, and fair treatment of employees. The protection of workers and the guarantee of their labour rights promote stability and a harmonious relationship between employers and workers. Thus, Nova-Wind places particular emphasis on the policies and measures it takes to reduce the occurrence of violations of workers' fundamental rights.

More specifically, Nova-Wind for the year 2022 employed a total of 1,457 employees, of which 597 were women and 860 were men. It is worth noting that 110 new recruitments were made, strengthening the capacity of the existing workforce. In addition, the number of full-time and part-time employees was 1429 and 28, respectively.

### Full-time and part-time employees



### New Hires



## Diversity and Equal Opportunities



The company's aim is to be distinguished for its culture, with equal opportunities for all employees without exclusion and with absolute respect for the individual identity of each person. A culture with standards of behaviour capable of motivating positive change both within our internal environment and in the wider market and society at large

At Nova-Wind, respect and protection of internationally recognized human rights is our firm and non-negotiable commitment. We are committed that our workforce does not include minors and there are no cases of forced labour. In addition, our Company supports and promotes the creation of a working environment that recognizes the value of diversity. Its aim is to be distinguished for its culture, with equal opportunities for all employees as a key component, without exclusion and with full respect for the individual identity of each person. A culture with standards of behaviour capable of motivating positive change both within our internal environment and in the wider market and society at large. We declare our faith and commitment to this goal with our Diversity and Inclusion Policy, which we introduced in 2021, as well as by signing the Diversity Charter, an initiative of the European Commission.

### Freedom of Association

We respect and protect workers' right to organise and the existence of information mechanisms. In July 2007, the first signing of the NSCA was announced, with retroactive effect from October 2006. The last renewal of the NSAA was in September 2011, and after its expiration it is voluntarily implemented by the company.

### Company's Internal Regulations

Transparency and integrity in the way we operate is indicated in our Internal Regulations that we have drawn up and apply. This regulation promotes ethical values, respect for laws and good business practices and the creation of an appropriate working environment. It is accessible to all our employees through Nova-Wind's corporate website (Nova-Windintranet).

### Women's Empowerment Programme

W for Women is a Wind effort aimed at implementing women's empowerment programs. During 2022, support activities for female Nova-Wind employees were carried out, specifically:

#### - Active Maternity Support and Family Protection

Five days of leave to expectant mothers, in addition to the current legislation. One day of maternity leave for expectant mothers, in addition to the current legislation. Full teleworking flexibility for new parents for their children's special moments (up to the age of 6).

#### - Well-being in the working environment

24/7 psychological support and well-being hotline. Additional health services through the group health care plan.

### Actions for the wider social environment

Nova-Wind implements the "Women in Tech" program, with the aim of creating opportunities for the new generation in STEM professions and to further strengthen the position of women in the field of technology. The most important actions of the program are:

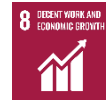
**Fully paid 6-month internship** for new students and graduates of polytechnics and technology schools.

**Designing a specialized training cycle** in new technologies to acquire digital skills and free access to technological equipment and tools, especially for young women located on islands of the barren line.





### 5.3 Health, safety and social benefits for employees



The health and safety of employees is a priority for Nova-Wind and therefore aims to ensure a working environment that offers safe working conditions.

Always with employee satisfaction in mind, the company has a range of benefits that are presented below. For 2022 the schemes were implemented for all Nova-Wind employees.

#### Wind for you

We take care to responsibly ensure excellent working conditions, benefits and advantages for our employees by offering a comprehensive competitive package that rewards performance, skills development and overall corporate success. As part of the corporate integration of new employees, an individual detailed benefits presentation is conducted by the Human Resources Department. In addition, all information is posted on the internal intranet and, at the same time, employees are also informed of anything new that joins the benefits pool by e-mail.

#### Benefits package

Competitive remuneration packages, both fixed and variable, which also consider the evaluation by the employees themselves, in order to contribute to a good working environment.

- Life insurance with disability/accident cover
- Group life and health care plan with the possibility of family members participating
- Check-up package for all employees
- Services and products at a preferential price
- Restaurant/cafeteria (at our premises in Athens and Paiania) with very preferential prices
- Discounts and offers in shops and businesses all over Greece

#### WIND win - WIND for you

The Company's NOVA-WIND Flexy Work program enables its people to work remotely one day a week, leveraging the full potential of technology. In addition, it enables flexible access to the office.

#### WIND Flexy Work

The Company's NOVA-WIND Flexy Work program enables its people to work remotely one day a week, leveraging the full potential of technology. In addition, it enables flexible access to the office. Wind Hellas was one of the first companies in Greece to implement remote work.

#### WIND friends & family

Preferential discounts on mobile plans as well as on combined plans, EON-Internet- fixed, for us and our loved ones

#### Approach to achieving a safe working environment.

- We implement a certified occupational health and safety management system in accordance with ISO 45001.
- We identify, analyze and assess occupational risks, including those arising from the COVID-19 pandemic.

- We prepare Occupational Risk Assessment Studies for each job, as well as safe working instructions.
- We make full use of experienced consultants: safety engineers and occupational physicians. We investigate with them any health-related accidents or incidents and take measures to eliminate or reduce the risks involved.
- We regularly monitor the quality of the working environment by measuring all necessary parameters such as dust, ventilation, lighting, volatile organic compounds, room temperature, humidity, drinking water quality, radiation and noise.
- We provide equipped dispensaries and/or pharmacies in each facility.
- We regularly inspect facilities and workplaces to identify any non-conformities and new hazards in a timely manner and use the findings from inspections to ensure continuous improvement.
- We are in open communication with employees, so they can submit their comments and suggestions for improvement at any time, with a simple email or even verbally.

For employee preparedness regarding emergency situations, we maintain emergency response teams and conduct evacuation drills at our facilities on a regular basis. These teams are trained in firefighting and first aid, as well as in emergency procedures by the experts in the field, the Fire Service and the Safety Technician/Occupational Physician.



#### Parental Leave

In 2022, 34 employees took advantage of parental leave.

#### Human Resources Development Process

A key tool for cultivating our values is regular performance appraisal. Central to this is the alignment of Nova-Wind's people with our corporate strategy, sustainable development goals and values through specific skills that we seek to continuously develop and evolve: achieving results, inspiration, active learning, focus on the customer experience, "big picture" perception. Each employee's resulting Personal Development Plan, designed in collaboration with his or her supervisor, ensures that we all have opportunities for growth according to our capabilities and the needs of the Company.

## 5.4 Employee Training



A key pillar of Nova-Wind's development and progress is the continuous training of its employees through training and skills enhancement programs.

The purpose of attending the training programs is to keep employees up to date on all technological developments, to train them in their work subject and to continuously develop their skills. For 2022, the training hours amounted to 21,349.

	Category	Average Training Hours	Average Employee Training/
2022	Senior Executives	41	14
	Middle Managers	299	
	Sales & Customer Service	17.889	
	Technical Staff	1513	
	Other Staff	1608	
	<b>Total</b>	<b>21.349</b>	

### Sales Academy

The Business Account Management team participated in a specially designed training aimed at strengthening sales skills with a focus on developing long-term engagement with our customers.

### Compliance Awareness

The Compliance Team at Nova-Wind managed the complexity of the merger process and communication of the updated Compliance Rules with remarkable expertise and professionalism. The following elements contributed to the effective implementation of the compliance culture:

Focus on Culture: We embraced the opportunity to inspire "One Team" and shape a new culture of compliance with an emphasis on ethics, integrity and accountability for all of us.

### 5G, CloT, VoLTE & other New Technologies

In cooperation with the internationally recognized and specialized telecommunications training company Mpirical, we designed and implemented a one-year digital program, with the main objective of enhancing skills and technical knowledge for 5G and other new technologies, such as CloT, VoLTE, GSM, GPRS, UMTS, LTE, Wi-Fi, Packet Transport Networks, etc. The engineers and technicians of our Network participated in this training.

### Internal Candidate Recruitment

We encourage Nova-Wind employees to explore opportunities for advancement in other teams and functions of the Company. Thus, when new positions arise, we give priority selection among existing employees as the best source of qualified candidates.

### External Candidate Recruitment

We sponsor and participate in multiple career workshops aimed at attracting candidates, informing them about job and development opportunities at Nova-Wind, and promoting the Company's image as an employer.

### Two-way communication

We use all modern means of internal communication in order to inform our employees about issues that concern them directly. The methods and communication channels of open and constructive dialogue that we use are surveys, workshops, meetings, the recently renewed NOVA-WIND Intranet, which hosts daily all the news concerning the Company and our industry, as well as the most modern platforms such as Microsoft Teams. In special cases, special microsites are also created for internal use, in order to provide adequate information and guidance to our colleagues around events of interest to them.

### Employee Opinion Surveys (Employee NPs)

We use this important institution to obtain targeted feedback from our people and act on it by designing "quick win action plans" within teams.

### Employee Blood Bank - Voluntary Blood

This is one of our most important initiatives, which has been running since 2002 and has since been implemented twice a year. In 2022, the Blood Bank covered the needs of 25 of our fellow human beings (colleagues and their relatives) with 44 units of blood.





## 5.5 Customer Experience

### Our approach

#### Customer Experience Transformation

Excellent customer experience, at all points of contact with the customer, is a priority and all processes are designed and implemented to ensure this. In 2022, the company focused on integrating its systems to better serve its customers, helping to manage data more efficiently and improve the customer experience.

In another particularly challenging year, we made systematic progress:

#### In mobile telephony:

- More than 2/3 of mobile contract customers have unlocked their usage, enjoying the W 3GB / W 10GB / W Unlimited GB plans.
- Subscribers using data from their mobile increased by 13% in one year, while data usage increased by 66% in 2022 compared to 2021.
- Our subscriber base grew by 10%, demonstrating that more and more subscribers trust Nova-Wind for their communications with the share of subscribers using a smartphone and utilizing data services growing at a very high level of 84%.

#### On fixed telephony and the Internet

- The consolidated fixed-line subscriber base Nova-Wind exceeded 1.2 million lines.
- 50% of the subscribers had NGA services.
- 55% of subscribers on NGA networks have nominal speeds of at least 100 Mbps.
- Over 100,000 fixed-line subscribers are interconnected to United Group's proprietary FTTx network.

#### In pay-TV

- The total subscriber base in TV services reached 386,000 subscribers at the end of 2022, taking advantage of United Group's technologically advanced EON platform.
- The availability of TV services is designed to address the entire Greek territory, supporting both satellite and streaming access through the innovative EON OTT platform, accessible via Android Box and Smart TVs, streaming devices, PC/Mac, laptops, tablets and smartphones.
- EON offers an immersive viewing experience both Live and On Demand with features such as profiling, displaying content based on each user's preferences, as well as 7-day Catch-up schedule tracking. It also offers a specially designed environment for children, through the EON Kids service, where children can safely enjoy EON's rich children's content. For sports fans, EON offers the unique EON Sports Mode service, with live match results, team compositions, player statistics and ratings from top football, basketball and tennis competitions.
- The TV services are available in simple, easy-to-understand schedules, making it easy for customers to choose the one that best suits their needs, interests and budget. Starting with the basic EON plan at €11 which includes all the modern features of the EON platform along with rich thematic, news and premium movie content, the largest collection of children's channels in Greece, as well as EON's extensive On Demand catalogue with more than 3,500 movies and series episodes. The plans are complemented with EON+ at 25€ which offers all the premium sports content of 12 additional Nova-Windsports channels with over 3,000 live sports matches from top competitions such as Super League, EuroLeague, Premier League, LaLiga, Bundesliga, Ligue 1, WTA etc.
- The EON platform was made available free of charge, throughout the country, for the matches of the national basketball team in the qualifying phase of the FIBA World Cup 2023 (February, June, August and November 2022).

## Promoting Sustainable Development - Digital Transformation

Nova-Wind has played an important role in the digital transformation of Greece, through the development of innovative technological solutions for smart cities. Its investment in information and communication technologies (ICT) seems to have enabled the creation of a comprehensive set of digital services and applications aimed at the practical improvement of citizens' daily lives.

In addition, the company's involvement in the digital modernisation of the public sector and local government, highlights its role in supporting processes aimed at improving public service and governance. Its contribution to addressing modern urban challenges can have a wider social and economic impact.

In addition, Nova-Wind actively contributed to the creation of the Historical Museum of the Olympus Revolution, using modern digital technologies. The use of virtual reality (VR) and 3D animation technologies enables the public to explore the history of the Municipality of Dion Olympus in a more modern and modular way. The interactive digital exhibition offers an opportunity for experiential education and information, allowing the public to discover the cultural heritage of the region. VR technology can provide an immersive experience, allowing visitors to 'live' historical events or explore the past in a more participatory way. These types of initiatives contribute to culture and education by encouraging the use of technology to preserve and promote history and heritage.



## Responsible mobile services

### Protection of minors

As far as multimedia information services are concerned, we strictly comply with the regulations for the protection of minors when using mobile phones. For our 901 and 909 lines, as well as for the five-digit SMS, a blocking can be requested after a telephone or written communication from the account holder (adult) and a relevant request.

### Responsible marketing

Our programs comply with regulations and voluntary codes on communication and marketing, in order to fully inform consumers about the benefits of our products and services.

We ensure that the communication and promotional material is in compliance with the provisions of the Greek Advertising and Communications Code (HCC-CC), the provisions on unfair competition and consumer protection and the Greek legislation in general. We follow and strictly adhere to the regulations/guidelines of the Communication Control Board (CCB).

### Principles of Communication

With the main concern of keeping our commitment to the subscriber and to serve him/her as best as possible, we define three basic principles of communication that govern our way of working:

#### Responsibility

We support the communication of products and services with clarity and transparency, through every promotional channel. Websites and apps are key channels of service and communication with consumers, making the process of offering our products and services easier, simpler and faster. Recognizing the right to equal access to Nova-Wind's services, we have proceeded to integrate a widget on our websites with accessibility features for people with visual, hearing and cognitive impairments. In a further effort to ensure that the public receives correct, understandable and clear information, qualitative and quantitative surveys are used.

#### Immediacy

We continue to invest in a communication strategy, maintaining multiple channels of distribution of our products and choosing direct and clear ways of promotion. We continue to enhance online communication and provide a unified online experience to every user through every medium.

#### Honesty

We ensure that our communication is in accordance with the principles of fair competition, in compliance with the Greek Advertising and Communication Code. Our goal is to establish trusting relationships with our existing and potential subscribers. That's why we invest in communication campaigns that gain public acceptance, clearly reflect any information and do not violate the Advertising Code.

### Training of our partners

We have created appropriate modern training programs and procedures, both for the salespeople and partners of the Nova-Wind chain of stores throughout Greece, which operates under franchise, and for our partners in Customer Service Call Centers, with the ultimate goal of offering an unsurpassed customer experience from all contact channels with our subscribers. The training programs address all the knowledge and actions taken by each channel, as well as the skill development needed for the Nova-Wind representative to achieve the best in customer service and customer experience. Combined methods are used to conduct the training programs in order to achieve maximum results.

## Responsible procurement

The relationships we maintain with our suppliers are based on strict criteria of professionalism, through the implementation of specific procedures aimed at controlling, as far as possible, the reliability of our suppliers. Through the use of special forms, general terms of cooperation and/or individual procedures, we expect each supplier interested in joining the list of suppliers cooperating with our Company to comply with the obligations relevant to its business activity, arising from national and European legislation, as well as to avoid any unfair and unethical professional business practice. In line with the above, we expect our suppliers to meet the necessary requirements regarding the following issues.

In order to ensure the integrity of our procurement department's operation, transparency and the avoidance of corruption that may be associated with it, the selection and evaluation of our suppliers, tenders and our daily procurement activities are carried out based on detailed, documented and formal procedures that respect human rights and comply with the principles of transparency, providing for specific measures, controls and approvals.

## Evaluation of suppliers

We strive to continuously improve the efficiency and effectiveness of our supply chain by developing the quality characteristics of our supplier base, evaluating our critical and larger suppliers and taking all necessary measures where required.

As of 2022 and in the context of promoting Corporate Responsibility in our supply chain, we started sending the new "Supplier and Partner Code of Conduct" to all new suppliers, having set as a necessary condition of cooperation the acceptance of the Code. In any case, the acceptance of the General Terms and Conditions of Supply, the Confidentiality Agreement and the Code of Conduct, as well as the completion of business-related questionnaires, are some of the most basic requirements for any new supplier to join our database. We assess our suppliers according to the requirements of ISO 9001 and ISO 14001 management systems, monitor tenders and carry out inspections when appropriate. In 2022, due to the merger, we did not proceed with an evaluation of our suppliers. We aim to complete the evaluation in 2024.

## Strengthening the local community

We try to strengthen local markets mainly in contracting/construction work, where we use local companies when possible, while Greek companies are generally used for purchases of promotional materials and printing work.

Spending on local suppliers represents approximately 76% of Nova-Wind's total spending in 2022. We try to strengthen local markets mainly in contracting/construction work, where we use local companies when possible, while Greek companies are generally used for purchases of promotional materials and printing work.

Spending on local suppliers represents approximately 76% of Nova-Wind's total spending in 2022.

Nova-Wind's commitment to invest intensively in infrastructure and the development of its network with responsibility and sensitivity towards public health and the environment. Its business strategy aims to contribute to the digital transformation of the country and to make digital access a reality for people living in remote areas, with the aim of equal participation in the digital future.

	Statement	2022 input
The mobile network	At the end of 2022, the population coverage of the network as shown in EETT's H2 2022 report was close to:	2G: 99,41% 3G: 78,1% 4G: 98,3% 5G: 61,2%
	This is the creation of a completely new radionetwork that allows nominal mobile broadband speeds of up to:	42 Mbps for 3G / 450 Mbps for 4G and 1.7 Gbps for 5G
	In the current phase of the project, the modernisation of the stations covered has been completed:	The entire Greek territory without exceptions. It should be noted that since mid-2022 the deactivation of 3G technology had begun gradually in order to transfer the spectrum to 4G/5G, which was completed on 31 March 2023.
	5G Network: By the end of 2022 deployed in selected areas:	Attica, Thessaloniki, Halkidiki, Patra, Kalamata, Trikala, Volos, Ioannina, Larissa, Lamia, Xanthi, Chalkida, Alexandroupoli, Cyclades (Paros/Naxos/Mykonos/Santorini), Crete (Heraklion/Chania), Rhodes etc. (total number of stations throughout the territory 550 stations for 2022)
	Cellular IoT Network (LTE-M/NB-IoT): at the end of 2022 deployed in selected areas of:	Athens, Attica, Thessaloniki, Patra (total 54 sites)
As it is known, on 12 January 2022 the Company was acquired by the United Group, therefore the data provided refer to the consolidated fixed line network and not exclusively to the ex-Wind network.	By 2022, the number of nodes as derived from both networks will be	LLU/RSS: 624 (LLU:178 & RSS:446)
	The backhauling circuits were upgraded to approx:	121 circuit upgrades carried out
	International Capacity	3380 Gbps
	GR-IX	210 Gbps
	Co-installations in Telecommunication Nodes	178
	Underwater Fiber Optic Cables between:	Not implemented for the year 2022
	Regarding the coverage of VDSL, Wind Hellas by the end of 2022 reached Urban Centres	490
E/M radiation & measurements		FTTH: 84189 lines (Kolettis, Solonos, Patissia, Kolonos, Kolonos, Filellinon, Keramiko, Akademias, Kalamata, Rafina, Mandra, Ilion, Karolos, Knossos)
	By the end of 2022 the installation of NGA FTTC/FTTC/FTTH infrastructure had been completed	FTTC-FTTH: 483995 lines.  FTTC AREAS: Kalamata, Almyros, Akadimias Larissa, Filellinon Larissa, Thuria, Kallithea, Nikaia, Korydallos, Keratsini, Agia Varvara, Haidari, Egaleo, Larissa, Pavlou Mela Thessaloniki, Nea Varna Thessaloniki, Ampelokipi Thessaloniki, Ilion, Kerameikos, Kyparissia, Loutraki, Mandra, Nea Peramos, Rafina, Knossos, Therissos, Patissia, Kolonos, Karolos, Tirnavos, Solonos, Fortezza, Ariadni, Gazi, Amaliada, Megalopolis, Perigallia, Kiato, Velo, Vrahati, Nea Kios
	In 2022, E/M were carried out in Wind stations either within the framework of Base Station licensing or following requests from citizens	In 2022, 8 E/M were carried out in Wind stations either by Victus' laboratory or by University Institutions on our behalf.



## Responsible network development

# 6. Environment



## WE CARE FOR THE ENVIRONMENT

True to its commitment to high quality and sustainable development, Nova-Wind has incorporated improved practices with a focus on environmental protection. It carefully manages the impact of its operations while offering progressive solutions. It aims for innovations that respect the environment, continuing to respond dynamically to the challenges of the times, raising awareness and promoting initiatives for a sustainable and responsible future.

## 6.1 Energy and Greenhouse Gas Management



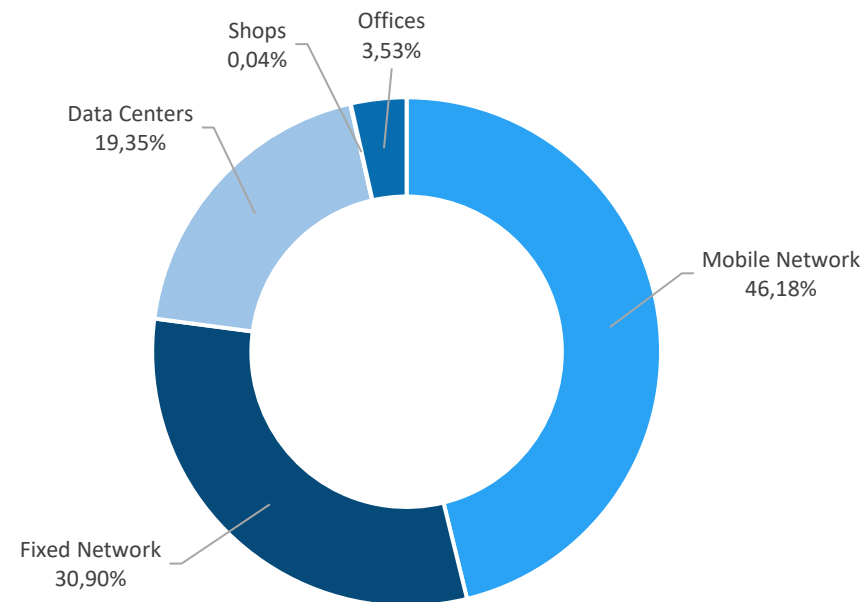
The rational management of energy is probably one of the most important challenges for Nova-Wind. As part of its efforts to operate its infrastructure in a responsible and sustainable manner, the company adopts strategies that enhance efficiency, reduce emissions and promote the use of renewable energy sources. Through the application of best practices in energy management, Nova-Wind not only enhances sustainability, but is also a driving force towards the creation of an innovative and sustainable telecommunications reality.

Demonstrating its active concern for the environment and management, Nova-Wind applies Environmental and Energy Management Systems, certified according to ISO 14001 & ISO 50001 standards for all the company's activities and facilities.

In the year 2022, most of the energy used will consist of electricity supplied by the national grid. At the same time, we use sources such as diesel, heating oil, and petrol for our vehicles. Total energy consumption amounts to 123,231.17 MWh including fuel for road transport.

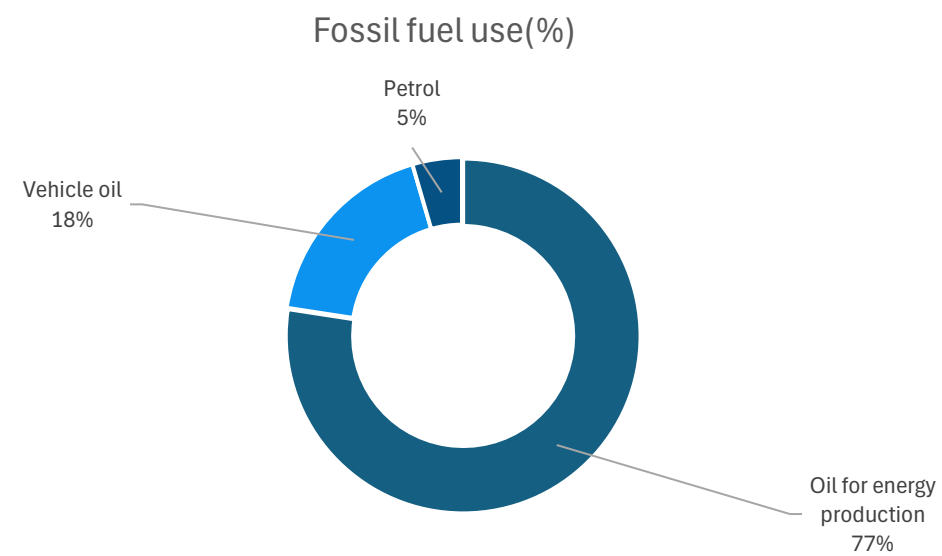
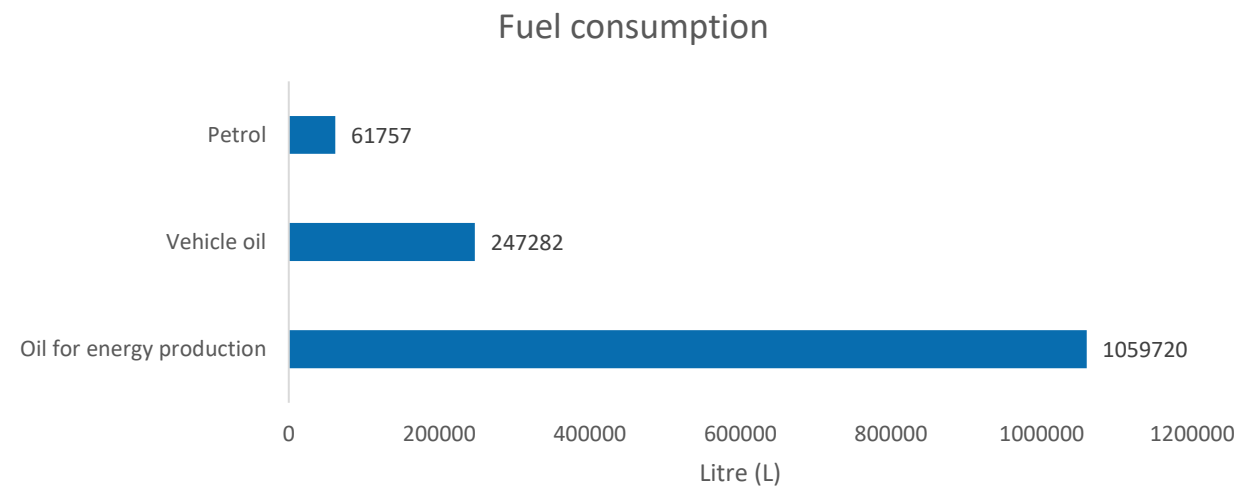
It is observed that the mobile network has, initially, the highest electricity consumption, equal to 56.9 GWh, followed by the fixed network with a consumption equal to 38.1 GWh. The shops consume 0.04 GWh, having the lowest consumption.

Distribution of electricity consumption

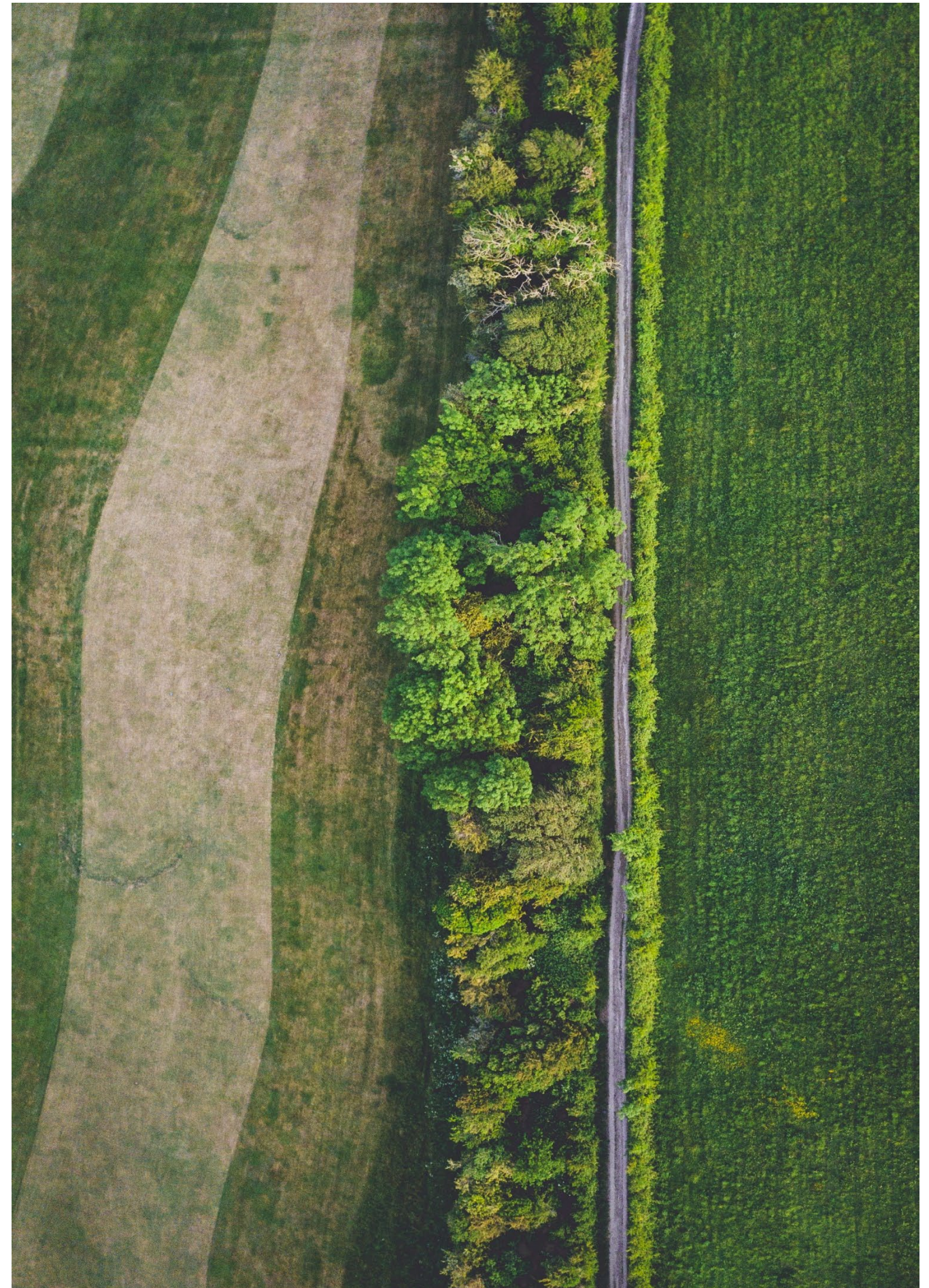


## Fuel consumption

In 2022, a total of 1,368,759 L of fuel was consumed. 77% of the total fossil fuel consumption is related to the operation of standby generating units, as well as the limited number of plants operating without any access to the electricity grid.



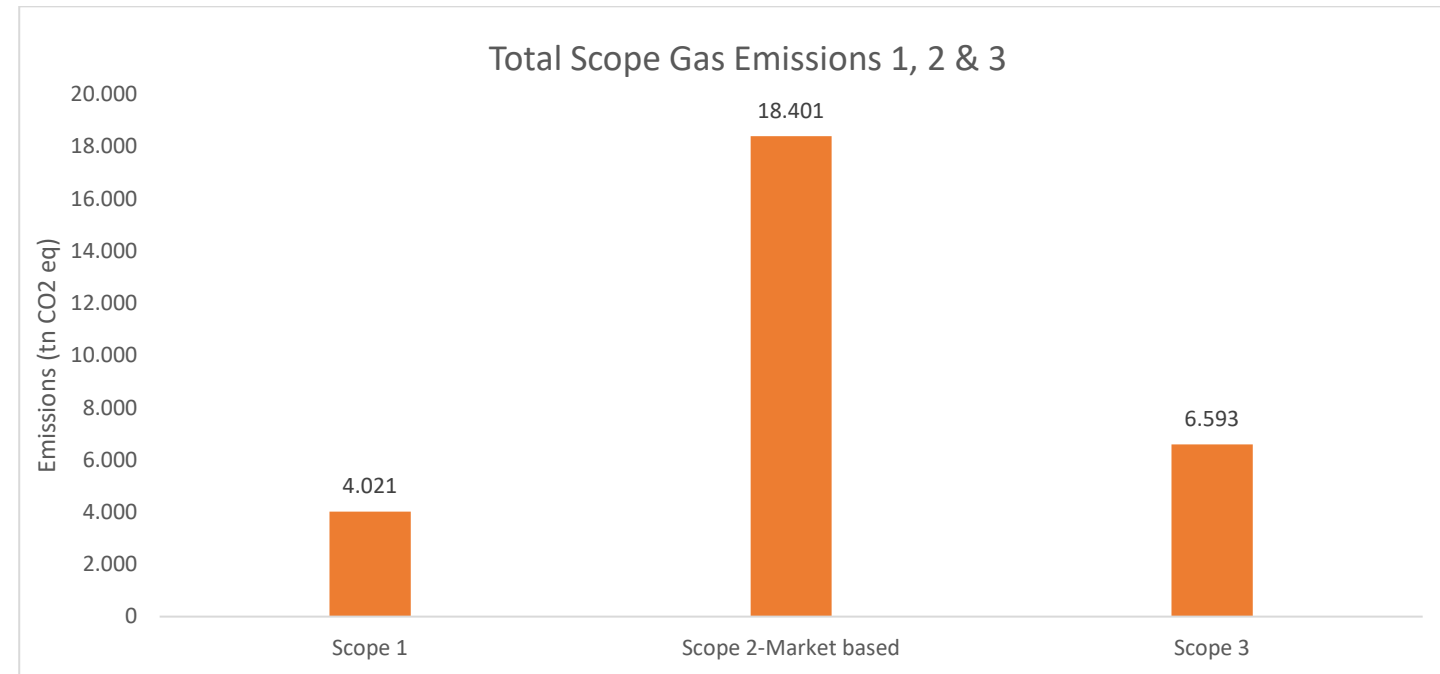
Petrol use accounts for only 5% of total fossil fuel consumption. An important factor in the limited volume of gasoline use is Wind Hellas' initiative to replace its fleet with new electric (EV), PHEV (plug in) and mild hybrid vehicles. This initiative was launched in 2021, with 54 cars already replaced so far. Nova-Wind's goal is to replace all the cars used under leasing contracts that are due to expire with new EVs, PHEVs or mild hybrids (40 cars in total). After the upcoming replacements, 30% of the total fleet will consist of vehicles with electric, plug-in or hybrid technology.





## Greenhouse gas emissions

Nova-Wind demonstrates its commitment to sustainable development by measuring CO2 emissions, covering Scopes 1, 2 and 3. Scope 1, or direct emissions focuses on reducing the carbon footprint that stems from our vehicle fleet and diesel generators. Scope 2 covers our purchased electricity and promotes the transition to low-emission energy sources and increasing energy efficiency. Our value chain emissions, or Scope 3, includes emissions from fuel and energy related activities not already included in Scope 1 or Scope 2, business travels, employee commuting, and our franchise shops.<sup>2</sup>



## Initiatives to reduce greenhouse gas emissions

In buildings with a high consumption profile due to significant installed equipment, metering devices have been installed to accurately control consumption and energy flow from the supply to the installed equipment. Continuous monitoring leads to actions to enhance energy efficiency, including minimizing heat losses, upgrading equipment to achieve high efficiency, and improving Power Usage Effectiveness (PUE) in data centers.

After energy audits were carried out in all Nova-Wind buildings, an energy saving investment plan was designed for the next three years. This plan aims to improve the electricity infrastructure, including investment proposals for independent power generation infrastructure in specific buildings. This strategy responds to the commitment to reduce energy consumption and its ecological impact, while promoting the adoption of sustainable practices throughout the business.

## Electromagnetic radiation

At Nova-Wind we take a responsible attitude towards monitoring and measuring electromagnetic radiation levels. During the installation, operation and control of our network, we comply with all international safety standards, as well as the guidelines of the Greek legislation. We recommend that the general public should only contact the relevant bodies and obtain information from communication materials issued specifically for this purpose, such as:

- Information brochure on Mobile Telephony and Health
- World Health Organization (WHO) Factsheet

<sup>2</sup> Other relevant scop 3 categories are calculated at the Group-level and the data is not available for Nova-Wind.

- Websites of the National Observatory for Electromagnetic Fields with available measurement results in interactive maps

The Greek Atomic Energy Commission is responsible for the control of non-ionising radiation. As part of its responsibilities, it carries out radiation measurements at communication stations, television stations and other locations throughout the country.

## Ozone-depleting gas emissions

Air conditioning mechanisms produce hydrofluorocarbon emissions, with a high global warming potential (GWP), although they do not contribute to the destruction of the ozone layer. As the amount introduced into each machine may escape into the environment, we count this emission as an atmospheric load. This emission is calculated in carbon dioxide equivalents and added to our overall ecological footprint. The calculation is based on data from the Intergovernmental Panel on Climate Change (IPCC). To reduce the burden of this category, we are implementing an ongoing monitoring and maintenance programme. If necessary, we replace older air conditioning units with newer models that have reduced breakdowns and leaks.

Nova - Wind's actions are fully in line with the current Environmental Legislation and has all the necessary operating permits required. The company is fully licensed for its activities, thus demonstrating its compliance with the rules and standards set by the competent authorities.

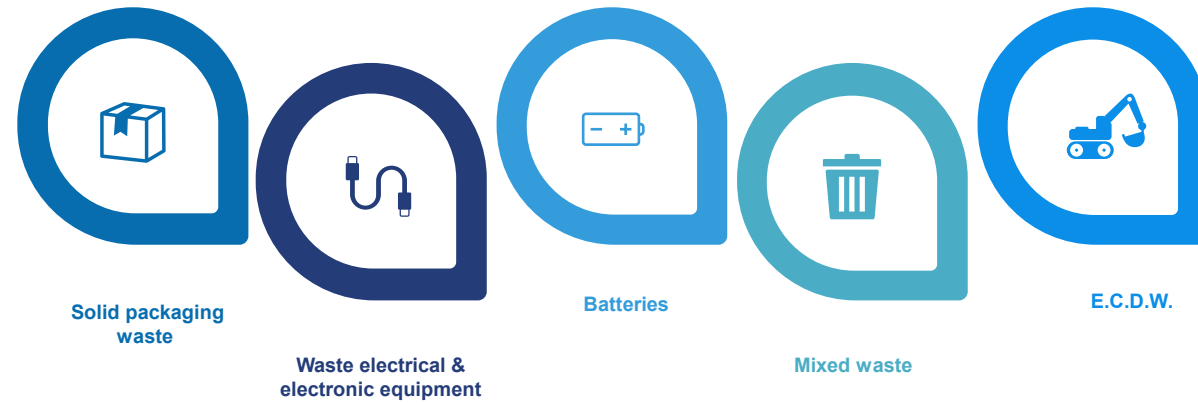


## 6.2 Waste Management & Circular Economy



Waste generated by the operation is subject to collection, separation and recovery (either through recycling or reuse). In cases where, for technical reasons, recycling or reuse is not possible, the waste shall be safely disposed of in a landfill, provided that it does not constitute hazardous waste. The main categories of waste generated are solid packaging waste (paper, wood, plastic), waste electrical and electronic equipment, batteries and mixed (municipal) waste sent to landfill. In addition, excavation, construction and demolition (E&C) waste is generated by upgrading/expansion of our network or dismantling of old stations. It is managed by disposal at licensed recycling plants through a network of partners and/or the relevant collective management schemes.

### Key Waste Categories from the operation of Nova

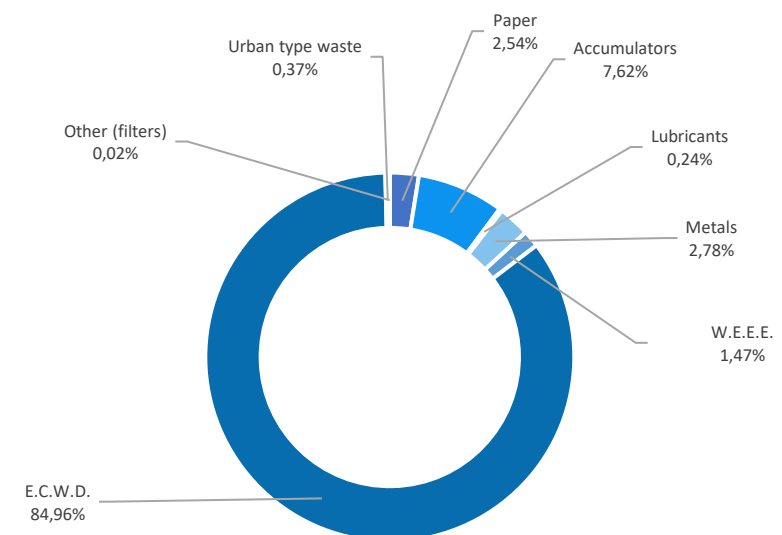


We participate or cooperate with most collective systems. Our participation ensures that we meet our obligations to recycle this waste, either as responsible producers or as collection points, for the public or employees. We collect mobile phones and batteries in our stores and encourage our employees to bring items from home for recycling through a special scheme covering appliances of all kinds, batteries, light bulbs and clothing.

Collective Management System	Type of waste
A.F.I.S. (Portable Battery Recycling)	Small batteries
Appliance Recycling S.A.	All kinds of electrical and electronic equipment
Combatt S.A.	Large batteries, accumulators
SY.DE.SYS S.A.	Large batteries, accumulators
RE-BATTERY S.A.	Large batteries, accumulators
Fotokiklosi	Lighting products, lamps, lighting fixtures
HERRCO (Hellenic Recovery Recycling Corporation)	All product packaging

In the year 2022, the production of waste equals 2606.7 tons. 85% of the waste production corresponds to WEEE, as Nova-Wind has upgraded and expanded the network.

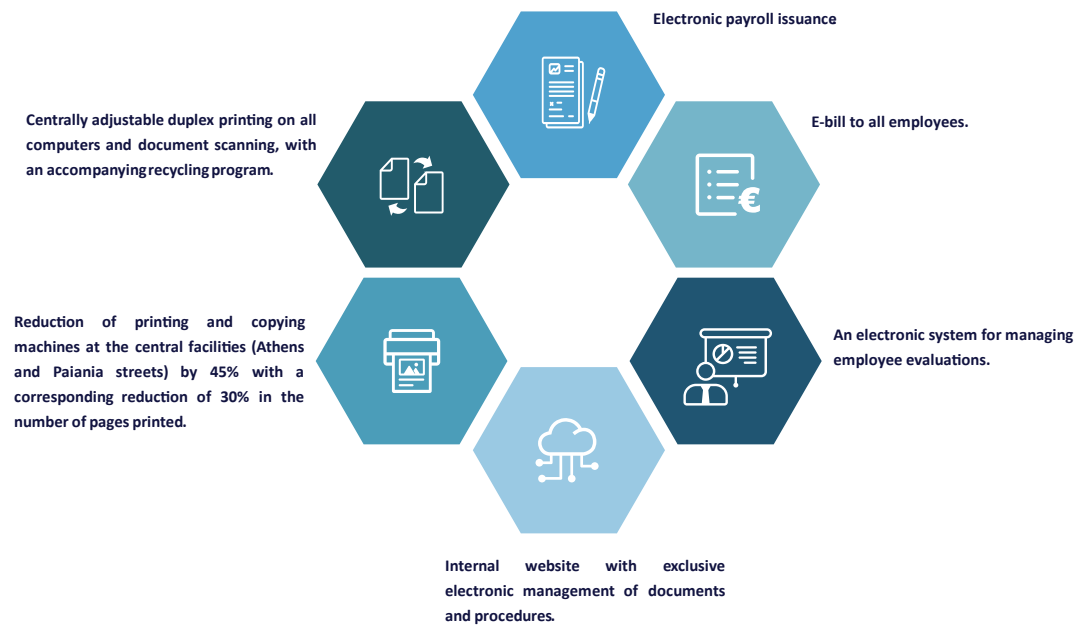
### Waste production distribution



Nova-Wind recognizes that natural resources are limited and considers their efficient use as a key priority for sustainable development. The Company promotes material recycling and reduces the waste generated by adopting modern processes. For more than a decade, actions aimed at reducing paper have been implemented. These actions are aimed at internal processes as well as at the public and our customers.

### Internal processes

Making sustainable practice and technology an ally in our business, we are implementing a series of innovative measures to reduce our environmental footprint and promote digital transition.



### External processes

As part of our digital evolution, we provide our subscribers with advanced digital services, including e-bill, which enables easy, fast, secure, and paperless account management from any device.



## 7. About the Sustainability Report

The Sustainability Report of 2022 includes information on Nova and Wind Hellas' Corporate Responsibility and Sustainable Development policies and programs, as well as the company's performance in actions it develops with the aim of sustainable development and entrepreneurship, giving priority to four axes: the Market, our People, the Environment and Society. It covers the period from 1 January 2022 to 31 December 2022. It is the first Sustainability Report of the new Nova ,after the integration of Nova and Wind Hellas into the United Group, the leading telecom and media provider in South East Europe. For the compilation of the Report and the collection of the data, the interdepartmental Sustainable Development Working Group collaborated in the preparation of the Report. This Report has been prepared based on the international GRI (Global Reporting Initiative) and SASB (Sustainability Accounting Standards) standards and covers all material issues as identified by Nova-Wind and its Stakeholders. A review of the accuracy of the data was carried out by the Company's Internal Audit Department. The results of the materiality analysis, the Principles and Sustainable Development Goals, as defined by the United Nations Global Compact Standard and Agenda 2030 respectively, have been taken into account in determining the content. It should also be noted that at the end of the report, tables of alignment with the GRI and SASB.

# 8. ESG Alignment Tables

## Non-Financial Metrics & Indicators

The following tables present a summary of the Non-Financial Indicators, namely the ESG (Environmental-Social-Governance) indicators that concern Environmental, Social, and Governance issues, which were analyzed in this specific report.

### 8.1 GRI Table- «with reference to»

<b>Disclaimer</b>	Nova – Wind has developed the Sustainable Report for the period 1/1/2022 – 31/12/2022 with reference to the GRI Standards.
<b>Use of GRI 1</b>	GRI 1 adoption 2021

GRI Standard	Disclosure	Reference to the Report
GRI 2-1	Name of the Organisation	Page 7
	Location of headquarters of the Company	106 Athinon Street, Athens, Athens, P.O. Box 104 42
	Countries in which the Company operates	Greece
	Status of ownership and legal form	Single-Member Société Anonyme Commercial and Industrial Company
	Markets served	Page 5
GRI 2-2	List of entities included in the Company's financial reports	Page 7
GRI 2-3	Reporting period	01/01/2022 – 31/12/2022
	Reporting cycle	Yearly
	Contact point for enquiries	Back cover
GRI 2-6	Main trade names, products and services	Page 5-6
	Describe the Company's supply chain	Page 37
	Significant changes in the Company and in the supply chain	Page 6
GRI 2-7	Workforce data by category, gender, age group, mobility and other diversity indicators	Page 31
GRI 2-9	Corporate governance structure	Page 17
GRI 2-11	Chairman of the highest governance body	Page 16
GRI 2-15	Conflict of interest	Page 21
GRI 2-22	Management message	Page 4
GRI 2-23	Mission and values statements and corporate policies on sustainable development strategy	Page 13-14

GRI 2-27	Compliance with laws and regulations	Page 19-23, 32, 36
GRI 2-28	Participation in unions/ associations	Page 8
GRI 2-29	Approach to stakeholder engagement	Page 10
GRI 2-30	Collective labour agreements	Page 31
GRI 3-1	Defining the content of the Report	Page 11-12
GRI 3-2	List of Material Issues	Page 11
GRI 3-3	Management of Material Issues	Page 16-18
GRI 201-1	Size of the company issuing the report	Page 7,37
	Direct economic value generated and distributed	Page 7
GRI 203-1	Investment in services and infrastructure	Page 5,27-30
GRI 204-1	Procurement practices	Page 22
GRI 205-1	Anti-corruption	Page 21
GRI 206-1	Competition law	Page 21
GRI 302-1	Energy consumption within the organisation	Page 39
GRI 306-3	Waste generated	Page 42
GRI 401-1	Total number of recruitments and mobility index	Page 33
GRI 401-2	Benefits provided to full-time employees	Page 33
GRI 403-1	Management system for the health and safety of workers	Page 33
GRI 403-2	Risk identification, risk assessment, incident investigation	Page 33
GRI 403-3	Occupational health services	Page 33
GRI 403-4	Worker participation, consultation and communication on health and safety at work	Page 33
GRI 403-5	Training of workers on health and safety at work	Page 33
GRI 403-6	Promotion of workers' health	Page 33
GRI 404-1	Hours of employee training	Page 34
GRI 404-2	Worker training programmes	Page 34
GRI 405-1	Diversity of governance bodies and employees	Page 32
GRI 406-1	Incidents of discrimination that may have been recorded	Page 32

	Disclosure	Reference to the Report
<b>Non-GRI</b>	Electromagnetic radiation	Page 41
<b>Non-GRI</b>	Ensuring confidentiality of communication	Page 19
<b>Non-GRI</b>	Safe use of new technologies	
<b>Non-GRI</b>	Quality of services	Page 24
<b>Non-GRI</b>	Network investments	Page 37

## 8.2 SASB Table

SASB Code	Activity Metric	Κάλυψη
<b>Carbon footprint and operations</b>		
TC-TL-130a.1.	(1) Total energy consumption, (2) percentage of electricity from the grid, (3) percentage of energy from renewable sources.	Page 39
<b>Data privacy</b>		
TC-TL-220a.1.	Description of policies and practices related to advertising and the protection of customers' personal data.	The Company strictly applies a wide range of technical and organisational measures as well as Security Policies, approved - where required - by the competent authorities (the Data Protection Authority and the Communications Privacy Authority).
TC-TL-220a.2.	Number of customers whose information is used for secondary purposes.	The Company processes the data of its customers exclusively for purposes related to its business. The number is confidential and cannot be disclosed to the public.
TC-TL-220a.3.	Total amount of monetary losses as a result of legal proceedings related to client confidentiality.	For 2022 there is no decision or fine issued by the Data Protection Authority.
TC-TL-220a.4.	(1) Number of law enforcement requests for customer information, (2) number of customers whose information was requested, (3) percentage that resulted in disclosure.	The number is confidential and cannot be disclosed.
<b>Data security</b>		
TC-TL-230a.1.	(1) Number of data breaches, (2) percentage of those involving personally identifiable information (PII), (3) number of customers affected.	The Company maintains the strictest policies to ensure the confidentiality, integrity and availability of its customers' personal data and takes all necessary measures to ensure that it is protected and processed in a transparent manner and always in accordance with the requirements of the legal framework. If we find that there is a data breach, we will inform the affected consumers and the competent authorities.
<b>Product end-of-life management</b>		
TC-TL-440a.1.	(1) Materials recovered through take-back programs, percentage of recovered materials that were (2) reused, (3) recycled, and (4) landfilled.	In the year 2022, the production of waste equals 2606.7 tons. 85% of the waste production corresponds to excavation, construction and demolition waste as Nova-Wind has upgraded and expanded the network. Page 42-43

### Open Internet

TC-TL-520a.1.	Total amount of monetary losses as a result of legal proceedings related to anticompetitive conduct regulations	In the period 2022 there were no incidents of anti-competitive behaviour and as a consequence there were no related losses.
TC-TL-520a.2.	Average actual constant download speed of (1) content owned by and related to the Company and (2) other non-related content.	The Company treats all communications equally, without exclusions, restrictions or interference and irrespective of the sender and the recipient, the content accessed or distributed, the applications or services used or provided or the terminal equipment used. The Company does not apply any measures of network traffic management, beyond reasonable measures, unless necessary and only for as long as necessary in order to: a) comply with the legal and regulatory framework, b) ensure the integrity and security of the network, c) maintain the integrity and security of the network.
TC-TL-520a.3.	Description of the risks and opportunities associated with net neutrality, zero-rating, paid peering and other related practices.	Information regarding the open internet, as well as technical details regarding service quality, quality parameters and traffic management measures can be found on the Company's website: <a href="https://Nova-Wind.gr/etairia/etairiko-profil">https://Nova-Wind.gr/etairia/etairiko-profil</a>

### Managing systemic risks from technological disruptions

TC-TL-550a.2	Description of systems to ensure uninterrupted service during service interruptions	We acknowledge and accept the necessity and responsibility for the creation and adoption of a Business Continuity Management framework, which we have developed in accordance with the international standard ISO 22301:2019 - Societal security - Business Continuity Management System - Requirements and the regulatory obligations governing the Greek market.
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# 9. External Assurance



CSE has been engaged by Nova-Wind to provide independent assurance over the Nova-Wind 2022 Sustainability Report. The aim of this process is to provide reassurance to Nova-Wind’s stakeholders over the accuracy, reliability and objectivity of the reported information and the coverage of the material issues regarding the business and the stakeholders. The Nova-Wind 2022 Sustainability Report is in compliance with the requirements of the GRI STANDARDS Guidelines at “Referenced level” as well as the SASB Standards for the Professional and Commercial Services Sector.

## Scope of work

The scope of work included a review of the Nova-Wind 2022 Sustainability Report activities and performance data related to the 2022 year that ended December 31, 2022. Specifically, this included:

- Statements, information and performance data contained within the Sustainability Report.
- Nova-Wind’s process for determining material aspects for reporting and the management approach to material issues.
- Nova-Wind’s reported data and information as per the requirements of the Global Reporting Initiative (GRI) STANDARDS Sustainability Reporting Guidelines, and SASB standards for Professionals & Commercial Services as indicated in the Report index.

The assurance process was conducted in line with the requirements of the AA1000 Assurance Standard v3 and applied a Type 2 moderate level of assurance.

## Methodology

In order to verify the content of the 2022 Sustainability Report we undertook the following activities to inform our independent assurance engagement:

- Conducted document reviews, data sampling and associated reporting systems as they relate to selected content and performance data.
- Reviewed a selection of external media reports relating to Nova-Wind to evaluate the coverage of topics within the Sustainability pages of Nova-Wind’s website.
- Reviewed the outcomes of Nova-Wind’s stakeholder engagement activities in 2022.
- Reviewed the materiality analysis and its outputs.
- Evaluated Nova-Wind’s public disclosures against the GRI and SASB standards.

More details on the specific information and data that were verified are presented in the following sections of the present independent assurance report.

## General Conclusions

With respect to the scope of work, we conclude that:

- The account of Nova-Wind’s activities and performance during 2022 and the way they are presented in the 2022 Sustainability Report is accurate.
- Nova-Wind adheres to the principles of inclusivity, materiality, responsiveness, and impact as per the AA1000 Accountability Principles Standard.

Any errors or misstatements identified during the engagement were corrected prior to the publication of the 2022 Sustainability Report.



#### Findings and conclusions concerning adherence to the AA1000AS principles of Inclusivity, Materiality, Responsiveness and Specific Performance Information

**Inclusivity** – how the key stakeholder groups were identified and engaged regarding sustainability issues. All the key stakeholder groups were engaged. Nova-Wind applied widely accepted principles in developing its approach to stakeholder engagement and sustainability.

**Materiality** – how the assessment of the importance of each sustainability topic took place. The process for determining the material issues by Nova-Wind provides a balanced representation of the material issues regarding its sustainability performance and impacts.

**Responsiveness** – how the company responded to the issues that were pointed out by each stakeholder group, and how this response is described in the 2022 Sustainability Report. Nova-Wind has responded in a sufficient manner to the issues that were of high concern to the stakeholders. This response is presented in an appropriate and sufficient manner in Nova-Wind's 2022 Sustainability Report.

**Impact** – how the company monitors, measures, and is accountable for how its actions affect their broader ecosystems. Nova-Wind provides adequate information in its 2022 Sustainability Report on how it monitors its impacts to the natural and human ecosystems. Nova-Wind has recognized all corporate responsibility issues and communicates its performance through the use of GRI and SASB Standards.

**Specific Performance Information** – The quantitative data relative to GRI Indicators and SASB Metrics have been collected and presented in the 2022 Sustainability Report in a way that the requirements of the GRI STANDARDS and SASB STANDARDS are met, the principles are applied, providing a holistic description of the Nova-Wind's sustainability performance. Specifically, during the independent assurance process, CSE examined evidence and documentation regarding:

- A description of other means, besides the materiality assessment, of identifying and verifying important sustainability topics for the 2022 year.
- A description (along with any supporting evidence and documentation) of the stakeholder engagement process, beyond the materiality assessment process, that took place during the 2022 year.

Evidence and documentation regarding key sustainability topics, included in the report:

- Policies of the organization (Quality Policy, Environmental Policy, Privacy Policy for Ensuring the Confidentiality of Communications, Non-Retaliation Policy and Investigation Protocol, Business Continuity Management Policy, Occupational Health and Safety Policy, Privacy Policy, Corporate Risk Management (Risk Assessment), ESG Policy)
- Certifications of the organization (ISO9001, ISO 22301, ISO 45001, ISO 14001, ISO 50001)
- Procurement policy
- Energy consumption
- Fuel consumption
- CO2 emissions (Scope 1, 2 & 3)
- Waste management
- Employees trainings
- Diversity
- Employee breakdown
- Verification that no allegations were made against Nova-Wind regarding corruption, as well as that no confirmed incidents under any applicable corruption laws were reported during the reporting period.
- Verification that there were no breaches of customer privacy or losses of customer data during the reporting period.
- Evidence and documentation about employee benefits.

Overall, the report is in compliance with the GRI STANDARDS (Referenced Level) and SASB STANDARDS.

#### Exclusions and Limitations

Excluded from the scope of our work is information relating to:

- Activities outside the defined reporting period or scope.
- Company position statements.
- Financial data taken from Nova-Wind's 2022 Sustainability Report
- Content of external websites or documents.
- Any other issue or policy was not referred in the documentation

This independent statement should not be relied upon to detect all errors, omissions or misstatements that may exist within the 2022 Sustainability Report. The scope of our work was defined and agreed in consultation with Nova-Wind.

#### Statement of CSE Independence, Impartiality and Competence

This is the first year that CSE has provided independent assurance services in relation to the Nova-Wind Sustainability Report. Our assurance team completing the work for Nova-Wind has extensive knowledge of conducting assurance over environmental, social, health, safety and ethical information and systems, and through its combined experience in this field, an excellent understanding of good practice in Sustainability Reporting and assurance.



**AA1000**  
Licensed Report  
000-142/V3-PN501

On behalf of the Assurance Team

Marina Alonistioti



**ResNovae**  
Sustainability & Investment Consultants



*The present report has been developed with the support of ResNovae – Sustainability & Investment Consultants and the ESG Management Platform  
ESGenius! - The Sustainability OS*