

# NOVA

## Sustainability Report 2024



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# CEO Message

Dear Stakeholders,



It is my pleasure to present the **2024 Sustainability Report of Nova**, a reflection of our progress in delivering reliable digital services while strengthening our contribution to Greece's sustainable development.

Our performance this year reflects this dual focus. We achieved **solid financial growth**, with revenues reaching **€900.8 million**, and continued our significant investment program of 2 billion Euros for the period 2022-2027 and enhance customer experience.

Environmentally, we delivered substantial progress on our decarbonisation pathway, achieving an **88.3% reduction in Scope 1 and 2 emissions** compared with our 2020 base year, and further improving the energy efficiency of our operations through upgraded infrastructure and certified management systems.

Our people remain central to our success. In 2024, we strengthened leadership development, **increased training hours by 73%**, reduced the **gender pay gap**, and **continued to cultivate an inclusive and empowering workplace**. We also **expanded our contribution to society**, with a large-scale initiative of environmental restoration after wildfires, combined with protection with the use of cutting-edge technology, announcing the donation of the "Smart Forest" civil protection

**solution for the island of Rhodes**, which demonstrates how Nova's technology can support climate resilience and protect local communities.

In 2024, we also **strengthened our governance foundations**, enhancing **risk management, compliance and information security** across the organisation. Our certified management systems and dedicated oversight committees ensure **transparency, accountability and responsible decision-making** in every aspect of our operations.

Looking ahead, **2025 we are focusing on execution as well as new initiatives**. Nova, as part of United Group, is aligned with and actively contributes to the United Group's **Net Zero Targets by 2040** target, maintains very low Scope 1 and 2 emissions, strengthens Scope 3 management, and continues transitioning to **100% renewable electricity**. Specifically, our targets include procurement of 100% renewable electricity annually by 2027, reduction of Scope 1 and Scope 2 by 90% from a 2020 base year by 2030 and Net-zero across Scopes 1,2 and 3 by 2040.

We are accelerating FTTH and 5G deployment, aiming to reach **around 830,000 households and businesses** with fiber by the end of 2025. On the social front, we are intensifying our efforts on environmental initiatives that

promote a proactive approach to protection with the use of technology, initiating thought leadership initiatives for the impact of climate crisis in Greece and the role of technology in combating long-term consequences. We are also aiming to strengthen leadership development and learning.

In the governance front, and as regards compliance, our 2025 targets include maintaining a Compliance Management System aligned with international best practices and securing external certification ensuring proactive adherence to evolving regulatory standards supported by initiatives that increase awareness of the Whistleblower line as a key mechanism for transparency and accountability.

Our commitment is clear: **to combine sustainable growth with meaningful impact, delivering reliable connectivity, supporting Greece's digital transformation, and contributing to a more resilient society**.

Thank you for your trust and partnership. I invite you to review this Report and share your feedback as we continue shaping Nova's sustainability journey together.

Sincerely,  
George Lamprou  
CEO Nova

## Highlights 2024

**901m**

Turnover

**221**

Stores

**90%**

5G Coverage

**1,332**

Employees

**25%**

Women in  
leadership positions

**11,512**

Training hours

**0**

Lost Time Injury  
Frequency Rate

**0**

Corruption  
incidents

**88.3%\***

Reduction in our scope 1 and  
2 market based emissions

**80%**

of our Consumed Electricity is  
Procured from Renewable Sources

**8%**

reduction in energy use at our  
building facilities versus 2023

\* Compared to a 2020 base year

## We are Nova

Nova, a member of United Group, the leading telecommunications and media group in Southeastern Europe, is a fully integrated provider of mobile and fixed telephony services, broadband internet, pay TV, and information and communication technologies (ICT), that constantly evolves to offer you even more.

Nova is moving forward with the implementation of a €2 billion investment plan by 2027 for the development of 5G network, expansion of the fiber network (FTTH), and premium pay-TV services, out of which more than 1.1 billion has already been invested. Nova is transforming the digital experience for private customers and businesses, providing access to new technologies, offering the most competitive price and outstanding customer experience.



### NOVA

Telecommunications services, including mobile, fixed telephony, broadband and subscription-based television



### UNITEDFIBER

Next-generation fiber-optic networks to deliver high-speed connectivity to homes and businesses



### NOVAICT

Innovative ICT solutions and system integration services to businesses and public organizations across Greece and the EU

### Nova Telecommunication & Media Single Member S.A.

The Company, formed through the merger of Nova and Wind Hellas, offers a broad range of pay TV, high-speed Internet, mobile, and fixed telephony services. Moreover, Nova with its long-standing tradition of innovation, draws strength from United Group's global experience, know-how, and investment plan for Greece. Alongside other solutions it develops, Nova provides the streamlining tools needed by individuals and businesses in Greece to improve their competitiveness against their European peers. Therefore, the Company steadily continues to innovate, invest, and actively shape the nation's next transformation.

### United Fiber Single Member S.A.

United Fiber is part of United Group and focuses on improving networks, specifically Nova Fiber - fiber optic infrastructure that reaches directly to homes (Fiber to the Home) and businesses (Fiber to the Office). Regarding FTTH, coverage is expected to reach more than 800K by the end of the year.

### Nova ICT S.A.

Nova ICT is a system integrator for businesses that aims to connect users with state-of-the-art technology by providing seamless integration solutions that streamline operations and unlock new opportunities. Using IoT, AI, tech and connectivity solutions for large-scale projects, Nova ICT is offering a full range of solutions, from complex software developments and robust hardware systems, to bespoke and tailored future-forward strategies for businesses in the public sector and undertakings throughout Greece and the EU.

## Vision, Values and Key Principles

As part of the United Group, we at Nova are guided by a vision deeply rooted in sustainability, innovation, and service excellence. Our operations are aligned with United Group's commitment to positively impact communities through responsible and transparent practices. This shared vision shapes our sustainable development strategy, driving long-term growth while maintaining integrity across all our services.



# Products and Services

Nova offers a wide range of products and services for both individuals and businesses. More specifically, regarding individuals and businesses Nova offers the following:

- ◆ Fixed & Internet Plans offering super lightning speeds up to 3Gbps
- ◆ FWA as true fixed alternative solution democratizing high speed internet
- ◆ Mobile postpaid and prepaid plans
- ◆ Top notch content and state of the art viewing experience through EON TV
- ◆ Nova innovative ecosystem of devices incl. most affordable 5G smartphone, kidswatch and headphones making cutting-edge technology accessible to everyone.



Regarding businesses Nova offers additionally to the previous Corporate Solutions as follows:

- ◆ **Data connectivity:** Nova's range of connectivity services, including SD-WAN, MPLS VPN, Leased Lines, and advanced internet access, forms a critical foundation for digital operations. Network efficiency and security are improved through SD-WAN and Secure SD-WAN, while configurations are adapted to each business needs.
- ◆ **Corporate Voice:** Supports flexible and efficient communication tailored to modern business needs. High-capacity, multi-channel voice services are provided through reliable PRI and SIP Trunk connections, making them suitable for organizations managing heavy inbound and outbound call traffic.
- ◆ **Data Center:** Nova offers tailored Dedicated Hosting, where computing systems are leased according to specific business requirements, cutting costs tied to hardware, power, and installation.
- ◆ **Cloud & Security:** Nova's Cloud and Security ecosystem is engineered for resilience, scalability, and addresses enterprises' needs for digital transforming.
- ◆ **Internet of Things:** Nova's Internet of Things ecosystem blends intelligent connectivity with sustainable performance, offering solutions that go beyond standard automation.

# Aligning our Strategy with Industry's Megatrends

Sustainability		Digitalization		Compliance	
					
Energy Consumption		CO2 Emissions		Cybersecurity	
<p>The industry is accelerating its sustainability agendas by targeting 50-100% renewable energy use by 2025, driven by climate commitments. A major step includes replacing legacy copper networks with fiber optics, which consume up to 85% less energy and offer far greater data efficiency. Additionally, many operators are discontinuing power intensive 3G networks, to not only reallocate spectrum but also reduce energy consumption across infrastructure.</p>		<p>6G is emerging as the next leap, set to enable smart grids and immersive extended reality technologies in a new communication revolution. Artificial intelligence is becoming deeply embedded in network operations, seamless handovers across networks (including satellites), while also utilizing predictive and cognitive AI for various use cases such as automated troubleshooting. As infrastructure grows more complex, industry is prioritizing cybersecurity with zero-trust architecture, Identity Access Management and advanced threat protection to safeguard against evolving risks.</p>		<p>A highly complex and evolving regulatory landscape that includes national laws, international standards, and industry-specific rules around competition, data privacy, and consumer protection (e.g. GDPR). As emerging technologies like satellite networks and AI redefine infrastructure, regulators are introducing new frameworks, demanding agile compliance strategies to avoid penalties and ensure operational continuity.</p>	
How is Nova responding to these Megatrends					
<b>TRANSITION</b> to energy-efficient fiber optic networks, phase out legacy copper and 3G infrastructure, and commit to sourcing 100% renewable energy to meet sustainability goals and reduce overall carbon footprint.		<b>DEVELOP</b> an AI-powered, flexible network platform that supports 6G capabilities and integrates satellite connectivity, while embedding zero-trust security measures to ensure resilient, secure, and seamless delivery of advanced services such as smart grids and augmented reality.		<b>INVEST</b> in stronger compliance frameworks ensuring transparency and alignment of data practices with evolving national and EU telecom laws.	

# Driving Sustainable Growth Through Digital Transformation and Infrastructure Investments

## Infrastructure Investment

Throughout 2024, Nova continued to shape the future of connectivity across Greece, through a series of key infrastructure investments. As demand for faster internet speed and dependable connectivity surged, the Company focused on strengthening and expanding its network capabilities, aiming not only to accommodate rising data needs but also to elevate the standard for quality and reliability of its services. Outlined below are certain standout investments:

### Fiber Network Expansion and 5G Rollout

Nova channeled substantial investments into growing its fiber optic infrastructure, prioritizing broader reach in cities and surrounding suburban zones in Greece. United Fiber's Fiber-to-the-Home (FTTH) network is experiencing rapid growth, supported by secured funding to carry out its

full investment strategy. By the close of 2024, FTTH coverage had been established for 540,000 homes and businesses. Meanwhile, Nova achieved its most significant mobile network expansion in nearly a decade, reaching 90% nationwide coverage in 5G technology. The FTTH solution ensures continuous, high-quality connectivity by delivering a significantly more stable and consistent online experience, especially when paired with Wi-Fi 6 technology. By removing copper wiring entirely and bringing full fiber optic connections straight to the user, FTTH enables higher speeds, improved connection stability, and enhanced reliability.

### Advanced Digital Systems

Nova ICT, our sister company, is developing an advanced system to support Civil Protection authorities in making well-informed decisions,

organizing available resources, and managing incidents efficiently by providing access to accurate, high-quality data. The project is part of a broader initiative to create an Integrated Risk Management and Prevention Information System within the national AIGIS program. Acting as the foundation of Greece's digital framework, in order to prevent disasters, the system utilizes smart technologies and artificial intelligence. It facilitates instant data exchange and prompt field-coordination, supporting efficient handling of emergencies.

### Smart Cities & IoT

Through smart city services built on IoT, the Company addresses key urban challenges including energy use, mobility, and digital governance. An example at hand is the case of implementing Smart Water Meters, specifically

advanced metering infrastructure, for the Municipality of Corinth. These solutions contribute to sustainable growth in line with development priorities and smart city initiatives of the EU.

### Digitization of Physical Archives

Preserving historical records while enabling their safe and timely access is made possible through advanced scanning, AI, and OCR technologies. These tools convert physical archives into searchable digital formats, improving accuracy and institutional efficiency, as seen in projects documenting third-country nationals (TCNs).

### Civil Protection

With natural hazards posing growing risks to both public safety and critical infrastructure, Nova ICT's civil protection systems combine intelligent monitoring with real-time information and insights,

through AI-powered cameras and advanced sensors, thereby supporting not only prompter and more efficient responses and allocation of resources but also situational awareness across regions.

#### Digital Culture

Technology is reshaping cultural preservation - AR and VR bring historical documents, art, and folklore to life through immersive experiences. A notable example is the digitalization of the Salamina Digital Museum, enabling amongst others AI tools, new technologies and applications.

#### Digital Health

Healthcare is being redefined through digital integration. Nova ICT has implemented eHealth systems that streamline processes and data flow and improve the accuracy of patient outcomes; case in point is the "Integrated Information System

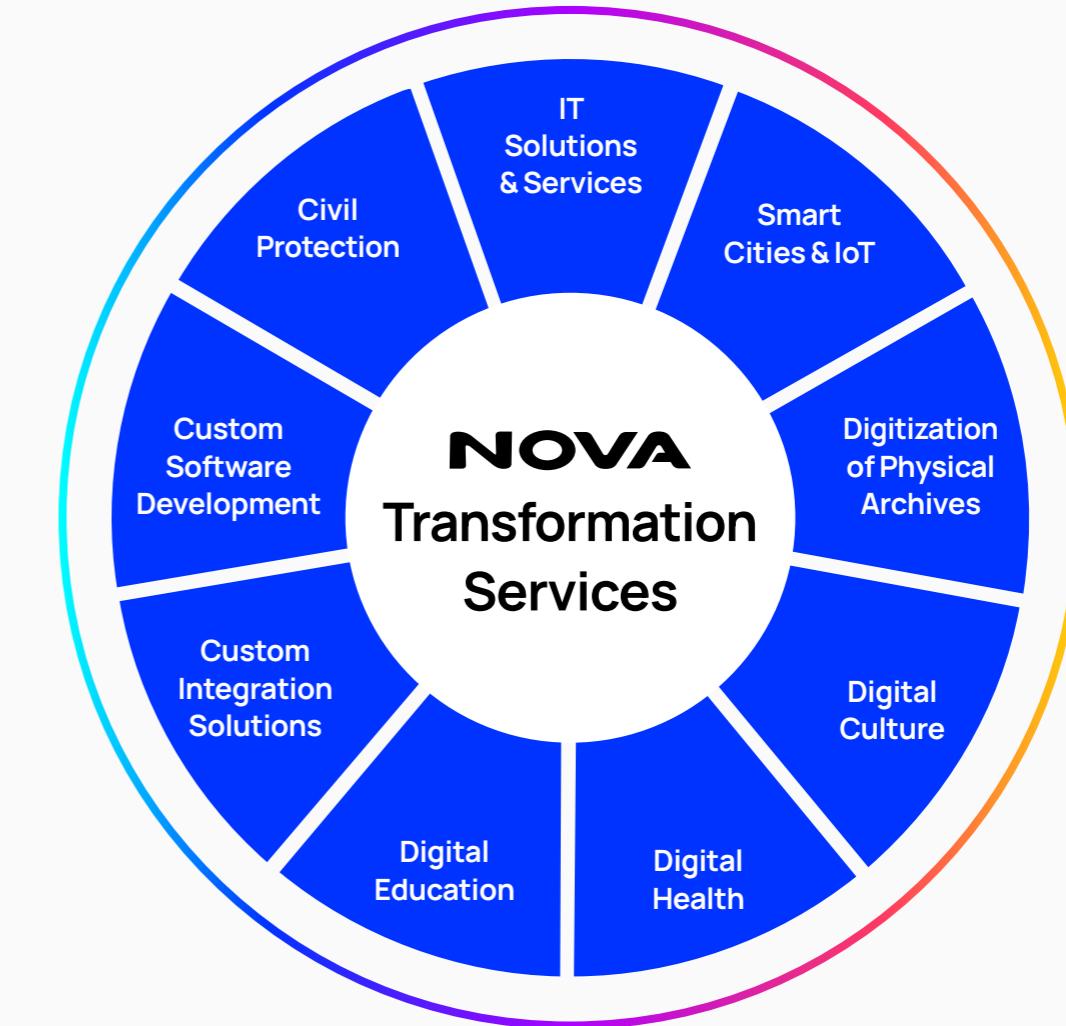
for the Care of Oncology-Hematology Patients" project that supports real-time clinical decisions.

#### Digital Education

As education is transitioning into a connected digital ecosystem, Nova ICT has developed platforms supporting interactive learning and administration that are tightly integrated with tools like e-class, facilitating communication, and access throughout the nation's educational institutions.

#### Custom Integration Solutions & Software Development

For the unique operational needs of businesses, Nova ICT helps businesses modernize their digital infrastructure by delivering both tailored integration and software development solutions. Each system is designed to improve efficiency and support long-term digital innovation across sectors.



# Strategic Partnerships

Nova's engagement with institutional bodies, professional associations and committees, alongside major industry events in 2024 has further highlighted our role as a leader in innovation, marketing excellence, and technological advancement.

## Professional Agencies



Association of Mobile Telephony Companies (AMTC)



Athens Chamber of Commerce and Industry (ACCI)



Hellenic Advertisers Association (HAA)



Hellenic Retail Business Association (SELPE)



The Federation of Hellenic ICT Enterprises (SEPE)



Hellenic Institute of Customer Service (HICS)



Hellenic Federation of Enterprises (SEV)



Greek People Management Association (GPMA)

## Sustainable Development Agencies



UN Global Compact Network Greece



Hellenic Network for Corporate Social Responsibility (CSR Hellas)



American-Hellenic Chamber of Commerce - Corporate Responsibility Committee



Association of Chief Executive Officers (ACEO)

# Financial Performance

The financial performance of Nova in 2024 reflects its operational strength and commitment to strategic investments across its core business areas: Nova Telecom & Media, Nova ICT, and United Fiber. With a retail presence of 221 (number of stores 2023 225), Nova continued to ensure widespread accessibility and consistent service quality. The company invested approximately € 64 million in employee wages and benefits, reaffirming its focus on people as a key pillar of organizational success. Overall, these figures demonstrate Nova's pursuit of sustainable growth, operational efficiency, and resilience in a competitive market environment.

## Financial data in €000

Financial Data Nova Group*		2023	2024
	Revenues	829,695	900,766
	Operating profit	503,233	527,715
	Operating expenses	101,230	108,240
	Payments to providers of capital	26,858	26,386
	Profit/(Loss) before tax	(64,188)	(31,294)
	Profit/(Loss) after tax	(52,186)	(44,185)
	Payments to government	331	1,865
	Total equity	174,265	139,422
	Total investments	279,517	319,013
	Total assets	1,699,878	1,776,356

\*Nova Telecom & Media, Nova ICT, and United Fiber

## Social Product in €000

To employees		2023	2024
	Salaries	60,084	62,417
	Employees insurance costs*	616	716
	Other employees' benefits	1,274	1,205
	Compensation (redundancies/pensions)*	97	167
	<b>Total</b>	<b>62,071</b>	<b>64,505</b>
	Payments to capital providers	26,858	26,386
	Payments to government	331	1,865
	Purchases from local suppliers (incl. VAT)	831,374	979,678
	Purchases from international suppliers	130,071	135,574
	<b>Total</b>	<b>1,028,634</b>	<b>1,143,503</b>

\*Employees insurance costs include pensions. Compensation includes redundancy expenses.

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# Paving the Way to Sustainability

Our contribution to the SDGs:



# Our Approach

Sustainable development is at the heart of our operations and is mainly characterized by our commitment to environmental protection, employee engagement, social contribution, customer satisfaction and responsible governance. By integrating the principles of sustainable development - UN 2030 Agenda for Sustainable Development - into our activities and operations, we aim to ensure a more resilient future for all. Our priority is to achieve goals that are aligned with the core activities and challenges of our industry, as well as with the material issues highlighted in this report.

Nova's 2024 Sustainability Report covers all the material issues, with particular emphasis on the four priorities that were assessed as the most material, for the Company's approach to corporate governance, environmental responsibility, and social impact.

Our four sustainability priorities are:



At Nova we set priorities that will create long-term value for our stakeholders and the Company itself.

Regarding **Environment**, despite the rapid growth of our Company, we continue to make successful efforts to reduce both energy use and waste. More specifically, we prioritize sustainability by increasing the energy efficiency of our facilities and the share of renewable energy in our energy consumption mix.

Aiming to create a safe and inclusive working environment, we have signed Diversity Charter, remaining dedicated to fostering and upholding principles of diversity and inclusion. We have also conducted an Employee Satisfaction Survey, considering **our People's** satisfaction and development a top priority. Through our CSR program and Projects with social impact, we contribute positively to **Society**.

**Customer experience** and satisfaction is highlighted through the increase in the total number of customers and the Net promoter score.

Nova's **Sound Governance** is reflected in the numerous certified Management Systems and corporate policies it has implemented.

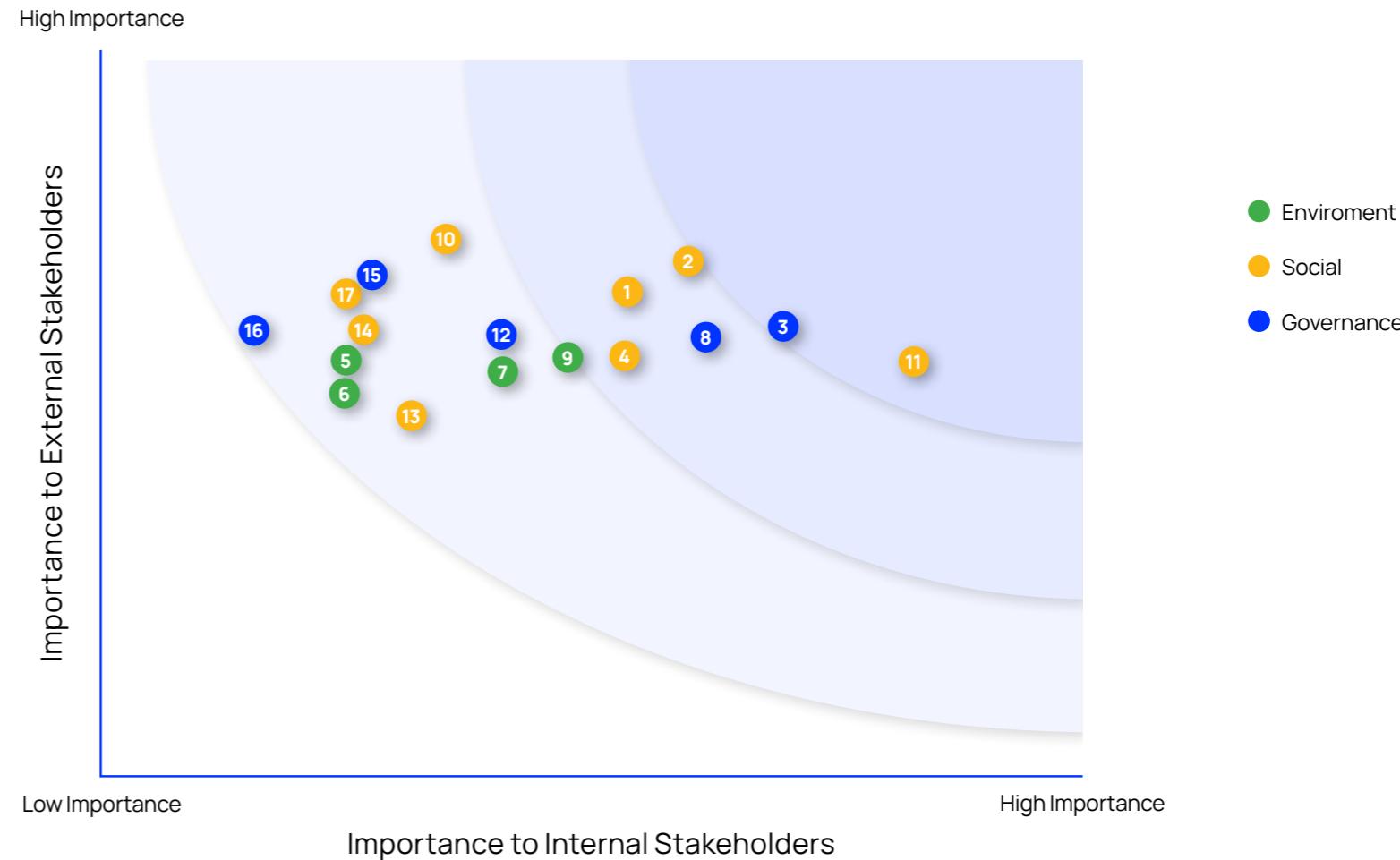
# Materiality Assessment

Nova applies a structured approach to identify and prioritize its material topics, that influence its operations and stakeholder decision-making. The process includes benchmarking against Sustainability Reports from peer companies, reviewing international and sector-specific standards (including SASB for telecommunications), and taking into account the outcomes of previous materiality assessments and Sustainable Development Reports of Wind Hellas. This ensures alignment with recognized frameworks as well as continuity with historically significant issues.

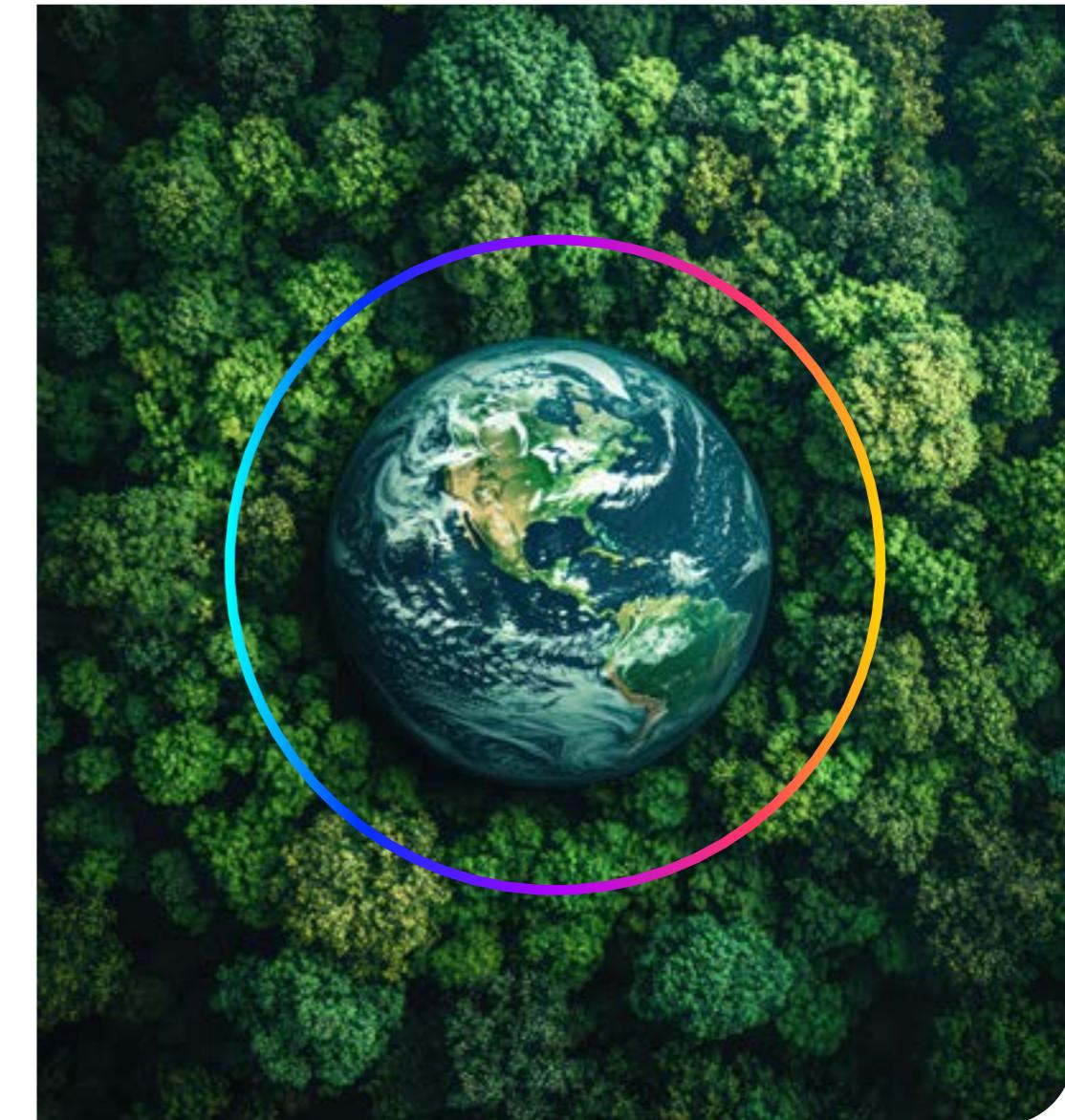
Following the development of the preliminary list of material topics, Nova undertook a stakeholder consultation in 2023 through an electronic questionnaire addressed to key stakeholder groups. The purpose was to validate the relevance and priority of the identified issues and ensure they reflect stakeholder expectations. The insights collected feed into Nova's sustainability priorities and support informed strategic decisions, while also strengthening the transparency and quality of related disclosures.

The results of materiality assessment are presented below:

## Materiality Matrix



Nova's Material Topics		SDGs
1. Employee Training		4. QUALITY EDUCATION 8. DECENT WORK AND ECONOMIC GROWTH
2. Network investments		8. DECENT WORK AND ECONOMIC GROWTH 9. INDUSTRY, INNOVATION AND INFRASTRUCTURE
3. Innovation and digital transformation		9. INDUSTRY, INNOVATION AND INFRASTRUCTURE 11. SUSTAINABLE CITIES AND COMMUNITIES 12. RESPONSIBLE CONSUMPTION AND PRODUCTION
4. Labour Rights		3. GOOD HEALTH AND WELL-BEING 8. DECENT WORK AND ECONOMIC GROWTH
5. Management of energy and Greenhouse Gas Emissions		7. INDUSTRY, INNOVATION AND INFRASTRUCTURE 11. SUSTAINABLE CITIES AND COMMUNITIES 13. CLIMATE ACTION
6. Wast management and circular economy		12. RESPONSIBLE CONSUMPTION AND PRODUCTION
7. Environmental Legislation		13. CLIMATE ACTION
8. Procurement practices		12. RESPONSIBLE CONSUMPTION AND PRODUCTION 13. CLIMATE ACTION
9. Electromagnetic Radiation		3. GOOD HEALTH AND WELL-BEING 11. SUSTAINABLE CITIES AND COMMUNITIES 13. CLIMATE ACTION
10. Workers' health, safety and social benefits		3. GOOD HEALTH AND WELL-BEING 8. DECENT WORK AND ECONOMIC GROWTH
11. Diversity and Equal opportunities		5. GENDER EQUALITY 10. REDUCED INEQUALITIES
12. Ethical Practices and competition law		8. DECENT WORK AND ECONOMIC GROWTH 12. RESPONSIBLE CONSUMPTION AND PRODUCTION
13. Support for local communities		1. PEOPLES 2. EARTH 10. REDUCED INEQUALITIES
14. Accessibility, affordability and customer service		10. REDUCED INEQUALITIES 12. RESPONSIBLE CONSUMPTION AND PRODUCTION
15. Ensuring confidentiality, communication and personal data protection		16. PEACE, JUSTICE AND STRONG INSTITUTIONS
16. Quality of service		9. INDUSTRY, INNOVATION AND INFRASTRUCTURE 11. SUSTAINABLE CITIES AND COMMUNITIES 12. RESPONSIBLE CONSUMPTION AND PRODUCTION
17. Rights and protection of children		1. PEOPLES 2. EARTH 3. GOOD HEALTH AND WELL-BEING



# ESG Goals and Targets

At Nova, the process of setting sustainability goals draws on insights from stakeholder engagement and the materiality analysis. These insights help shape our priorities, inform operational focus areas, and guide the development of initiatives that promote responsible business practices.

Nova's contribution to climate-related goals is aligned with the wider framework of United Group, which has committed to reducing its carbon

footprint through SBTi-validated targets. Nova's role supports the achievement of these group ambitions, particularly in areas such as emissions reduction and operational efficiency.

While formalized, standalone ESG targets at the Company level are still in development, Nova continues to strengthen its environmental and social practices through internal programs and alignment with recognized standards. Key areas

of attention include energy management, digital inclusion, employee well-being, and a corporate governance.

The Company uses global frameworks, such as GRI (Global Reporting Initiative) and SASB (Sustainability Accounting Standards Board), as reference points when selecting indicators and performance metrics, ensuring that its disclosures reflect stakeholder expectations and

support progress tracking over time. All standards are aligned with the European Green Deal's goal of achieving climate neutrality by 2050 and the United Nations Sustainable Development Goals (SDGs) for 2030.

These actions confirm the Company's commitment to the Sustainable Development Goals and the promotion of responsible and sustainable business practices.

Pillars	Target Type	Description of Nova's target	Target Year	2024 Performance	Contribution to the SDGs
Environment 	Net - Zero Target	Net-zero emissions across the value chain	2040	Significant progress has been achieved toward the net zero target, with <b>88.3%</b> completion for Scope 1 and Scope 2 emissions. Additionally, progress on Scope 3 emissions currently stands at <b>8.7%</b> , marking an important first step in addressing value-chain emissions.	
	Scope 1&2 Near Term Targets	Reduce absolute 1 and 2 GHG emissions by 90% from the 2020 base year	2030	As of now, <b>88.3%</b> of the Scope 1 and Scope 2 emissions reduction target has been achieved, reflecting strong progress and significant advancements toward the overall goal.	
	Green Energy Sourcing	Maintain the annual sourcing of 100% renewable electricity in our direct consumption	Annual	<b>80%</b> of the target has been achieved through the continued annual sourcing of renewable electricity for direct consumption, reflecting a sustained commitment to clean energy use.	
	Zero Waste in Landfills	Divert 100% of our generated operational waste from the landfill	2030	<b>84%</b> of the target has been achieved toward diverting operational waste from landfill, reflecting substantial progress toward the goal of zero waste to landfill by 2030.	

Pillars	Target Type	Description of Nova's target	Target Year	2024 Performance	Contribution to the SDGs
 <b>Social</b>	Gender Equality in Leadership	Achieve a representation of 40% Women in Managerial Positions	2030	<b>2023:</b> 32% <b>2024:</b> 33% <p>Although the representation of women in managerial positions has experienced slight year-to-year variations, we continue to make steady progress toward our 2030 target of 40%. Strengthening our leadership development, mentoring, and inclusion initiatives remains a key priority to ensure long-term, sustainable gender balance across all management levels.</p>	
	Progressive Reduction of Gender Pay Disparity	Continuously reducing the median gender pay gap	Annual	<b>2023:</b> 18.7% <b>2024:</b> 16.8% <p>As part of our commitment to equality and inclusion, we are seeing a steady reduction in the median pay gap between men and women, reinforcing a culture of fairness and equal opportunity within the organization</p>	
	Mitigating Unconscious Bias	Ensure that all managers undergo training in recognizing unconscious bias and adopting inclusive recruitment practices	2026	<p>The themes of Diversity and Unconscious Bias will be integrated as dedicated modules within the Leadership Development Program planned for 2026, targeting the top 200 leaders of our company.</p>	
	Enhance Employee Development	Achieve an average of 25 learning hours per employee annually	2030	<b>2023:</b> 5 per employee <b>2024:</b> 9 per employee <p>Even though we are currently at single-digit hours of training per employee, comprehensive actions and initiatives have been designed and planned for implementation by 2030 to ensure that the target of 25 hours per employee per year is safely achieved, enhancing learning and development across our entire workforce.</p>	
 <b>Governance</b>	Comprehensive Ethical Training	100% of workforce to have completed United Group's anti-bribery and corruption training	Annual	99%	
	Compliance Management System	Maintaining a Compliance Management System aligned with international best practices ensuring proactive adherence to evolving regulatory standards	Annual	<p>The objective was achieved through the consistent implementation of the existing Compliance Management System, continuous monitoring of regulatory developments, and the execution of compliance controls and actions in line with international best practices.</p>	

# Stakeholder Engagement

Stakeholder participation is of strategic importance for Nova, as it allows us to systematically receive input and feedback on any issues that might be challenging. This is the first step for early detection, effective management and planning and informed decision making. Stakeholder insights help us to mitigate the relevant emerging risks and proactively identify the opportunities that arise from them. We recognize that stakeholders influence and can directly affect our growth, actions and help us achieve our corporate objectives. At the same time, we acknowledge the impact we in turn have on our stakeholders. Engagement with all stakeholders is achieved in an inclusive and non-discriminatory manner.

Stakeholder relationships and cooperation are a structural element of our approach to sustainable development. Stakeholder views and insights catalyze our understanding of the likely impacts of our activities and operations. Additionally, meaningful stakeholder engagement is essential

to guiding our efforts and ensuring we consistently meet their expectations. Nova's key stakeholder groups are:

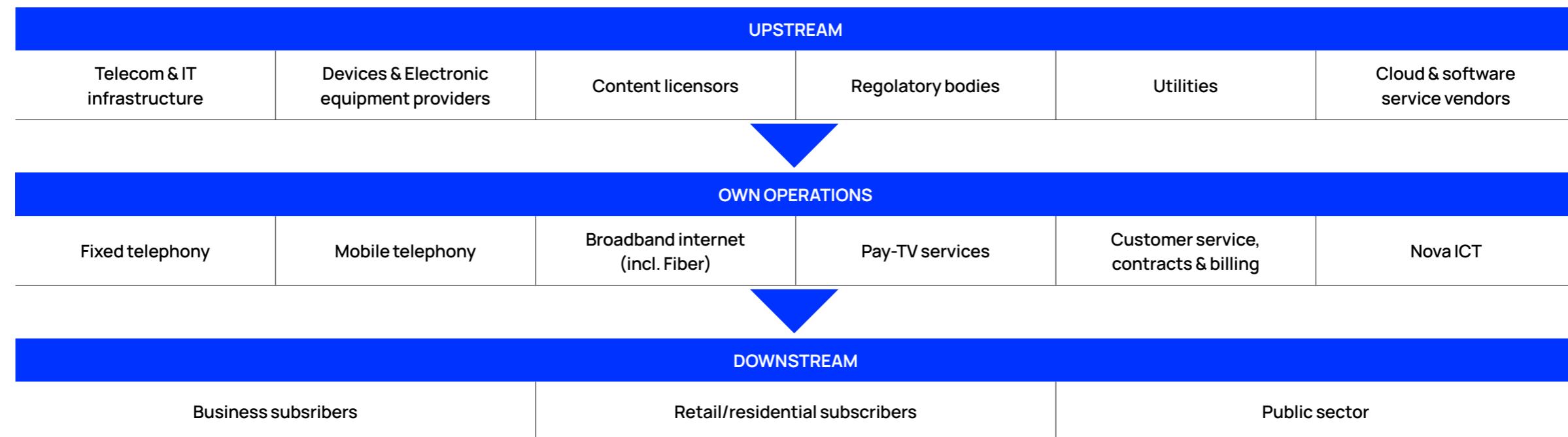
- ◆ Shareholders and Investors
- ◆ Customers (Individuals)
- ◆ Customers (Businesses)
- ◆ Employees
- ◆ Commercial Network
- ◆ Parents - Educators
- ◆ Academic Community
- ◆ ESG Analysts - Rating Agencies
- ◆ Local Communities
- ◆ NGO
- ◆ Local Government
- ◆ State / Government Agencies
- ◆ Media
- ◆ Policymakers/Regulatory Authorities
- ◆ Suppliers



We have established strong communication channels with all groups to encourage active participation, understand expectations and formulate our approach to sustainability and resulting integration into both our strategy and operations. The channels and frequency of communication with stakeholders are adapted according to each category of stakeholders depending on their needs and characteristics.

## Nova's Value Chain

The value chain constitutes the foundation for Nova Greece's operations as a top telecommunications operator. Not only does it include a number of interrelated strategic and operational activities aimed at providing high-quality services, but it is also integrating sustainability across our way of working. Our dedication to operational excellence, resilience, and environmental responsibility is evident throughout our value chain, from infrastructure development to customer service.





# Delivering Value to all our Stakeholders

The value creation model is the blueprint of how Nova's resources and technical capabilities are applied across its value chain. Providing insight into how the Company operates, interacts, and creates value for its stakeholders, the model below highlights the links between input, processes, and outcomes.

## INFLOWS

### Financial capital

The Company's objective regarding capital management is to ensure its ability to continue operating in order to provide returns to shareholders and benefits to other stakeholders, while maintaining an optimal capital structure to minimize the cost of capital. The Board of Directors monitors the Company's activities to ensure that the required capital structure is maintained.

### Industrial capital

Nova is one of the leading mobile network providers in Greece, headquartered in Athens. It operates 221 stores, 213 of which accept returns or replacements of electronic equipment, and has 117 commercial partners. Nova consistently leads the way, continues to invest, and actively participates in the country's next major transformation.

### Human capital

In 2024, Nova employed 1,332 people. Emphasis was placed on maintaining a safe, modern workplace while supporting professional growth through continuous training. These efforts remain vital to the company's ongoing success.

### Natural capital

Nova acknowledges the importance of environmental protection as a key pillar of sustainable development. It acts with awareness and implements a responsible environmental strategy, committing to the continuous improvement of its environmental performance by adopting eco-friendly best practices, intending to reduce its environmental footprint.

### Social capital and Relations

Nova consistently advances the customer experience by emphasizing innovation and timely responsiveness to shifting customer expectations. A range of strategic initiatives is implemented to reshape the customer journey, reflecting a strong commitment to service excellence and lasting customer loyalty.

### Intangible capital

Emphasis is placed on developing original technologies and pioneering products that offer unique solutions. With its Fiber to the Office service, offering ultra-fast internet speeds up to 3 Gbps. This service delivers 100% fiber connectivity directly to businesses, ensuring high-speed, reliable, and stable internet access that supports modern digital operations.

## VALUE CREATION MODEL

### MISSION - VISION - CORPORATE VALUES

#### NOVA

Innovation, people-centered philosophy, responsibility, good governance

### How we create value

Our values emphasize responsible governance, ethical business conduct, and a strong commitment to innovation. These values define how we operate with integrity and respect for our stakeholders while continuously improving our environmental and social responsibility performance. Through these principles, we strive to provide high-quality telecommunications and media services that support community well-being and environmental stewardship.

### Area of activity

Nova is the company by which the Internet, mobile telephony, and pay TV were first introduced to Greece. The Company and its subsidiaries operate in the fields of telecommunications and media, offering either individually or in combination fixed telephony services, mobile telephony services, internet and broadband access, as well as subscription-based radio and television services.

### Business sectors



### Stakeholder group

Shareholders & Investors, Parents/ Educators, Employees, Suppliers, NGO, Local Government, Customers (individuals), Customers (Businesses), Policymakers/ Regulatory Authorities, Media, State/ Government Agencies, Local Communities, Commercial Network, ESG Analysts - Rating Agencies, Academic Community.

## IMPACTS

901 mil €  
Turnover

319 mil €  
Total Investments

9  
Average hours  
of training per  
employee

+73%  
Increase in  
training hours

39,513 tnCO<sub>2</sub>e  
Emissions  
Reduction

322.83 tn  
Of Waste  
Recycled

29,383€  
The total amount  
of donations

3,912,243  
RGUs

6  
ISO Certifications



02

# Environmental Responsibility



## Our Environmental Framework

In response to the growing challenges of climate change and environmental degradation, we are committed to operating with environmental responsibility. Recognizing our obligation to protect the environment, we have developed a structured approach that integrates sustainability into our business strategy and daily operations. As part of this approach, we are also adopting methods to assess climate-related risks, with the aim of enhancing our resilience and strengthening our ability to respond to climate-related challenges.

Our strategic priorities focus on achieving decarbonization through energy efficiency

and emission reduction initiatives, embracing circular economy principles by minimizing waste, maximizing resource efficiency, and embedding sustainable practices throughout our operations and value chain. To further strengthen our approach, we have implemented environmental and energy management systems in accordance with the international standards ISO 14001 and ISO 50001. In line with these standards, we regularly review and reassess all relevant parameters to effectively manage our environmental impacts and to ensure the continuous improvement of our environmental performance.



**ISO 14001**

Environmental Management



**ISO 50001**

Energy Management

### Our Environmental & Energy Management Approach

1 Identify environmental and energy-related risks and opportunities.

2 Identify significant energy uses and conduct regular energy audits.

3 Manage environmental impacts and energy use effectively.

4 Ensure continuous compliance with relevant laws and regulations.

5 Establish clear, measurable objectives to enhance both environmental and energy performance.

6 Collect and analyze quantitative data to systematically track progress, improve resource efficiency, and optimize overall performance.

7 Maintain and strengthen system effectiveness through regular internal and external audits that assess implementation, and identify areas for continuous improvement.

Our Environmental Policy integrates the principles of sustainability and responsible operations, is aligned with the ISO14001 and ISO 50001 standards and ensures compliance with all relevant EU and national environmental legislation and regulatory requirements. It reflects our commitment to continuously improving the Company's environ-

mental performance by setting clear objectives, monitoring progress, and promoting environmental awareness throughout the organization. Recognizing our responsibility to protect the environment and minimize our carbon footprint across all areas of our operations, we are committed to the following:

Reduction of CO<sub>2</sub> emissions

Sustainability in the supply chain

Circular Economy

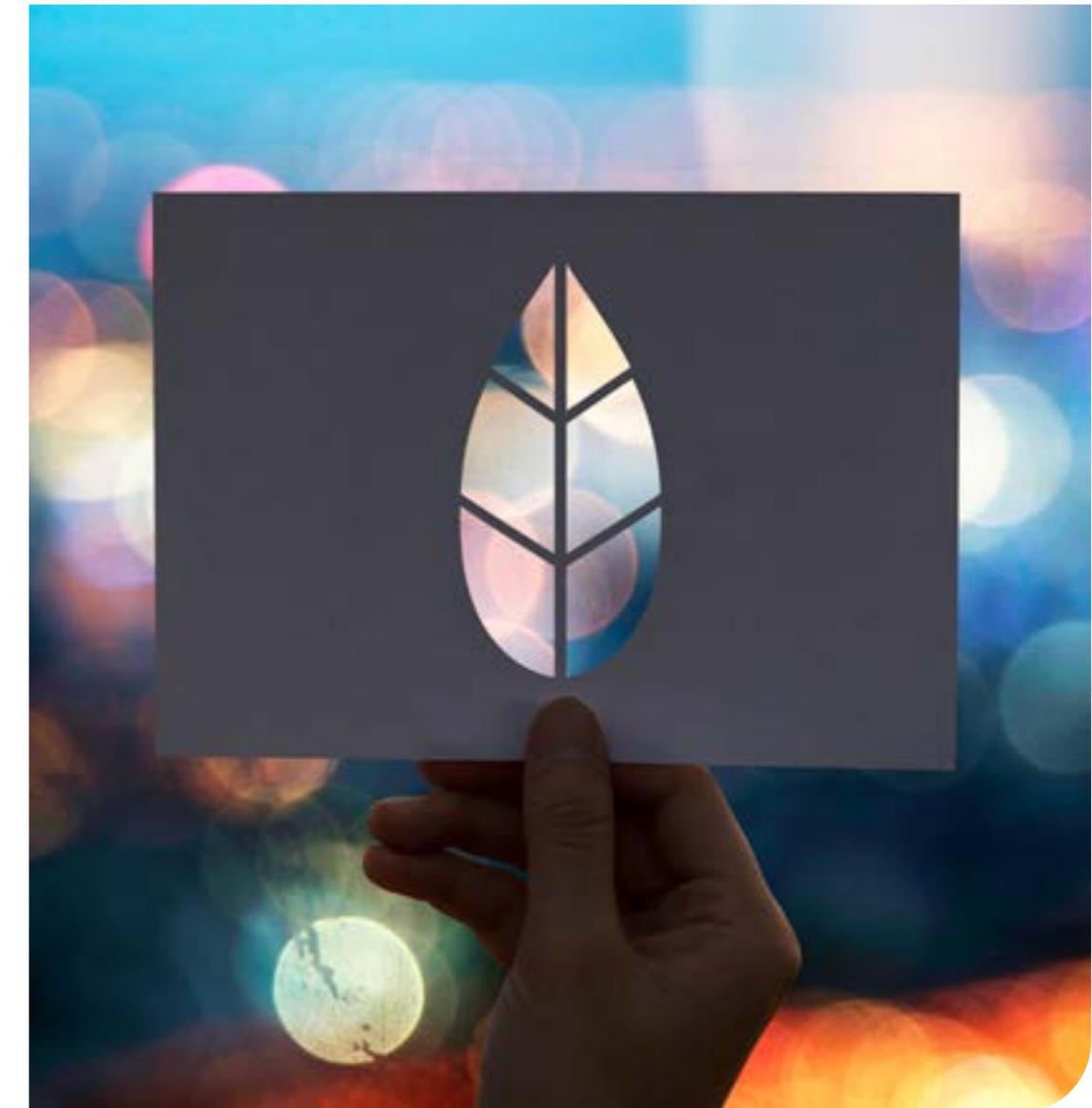
Adopting renewable energy technologies

Responsible Waste management

Product & Service innovation

Conservation of biodiversity

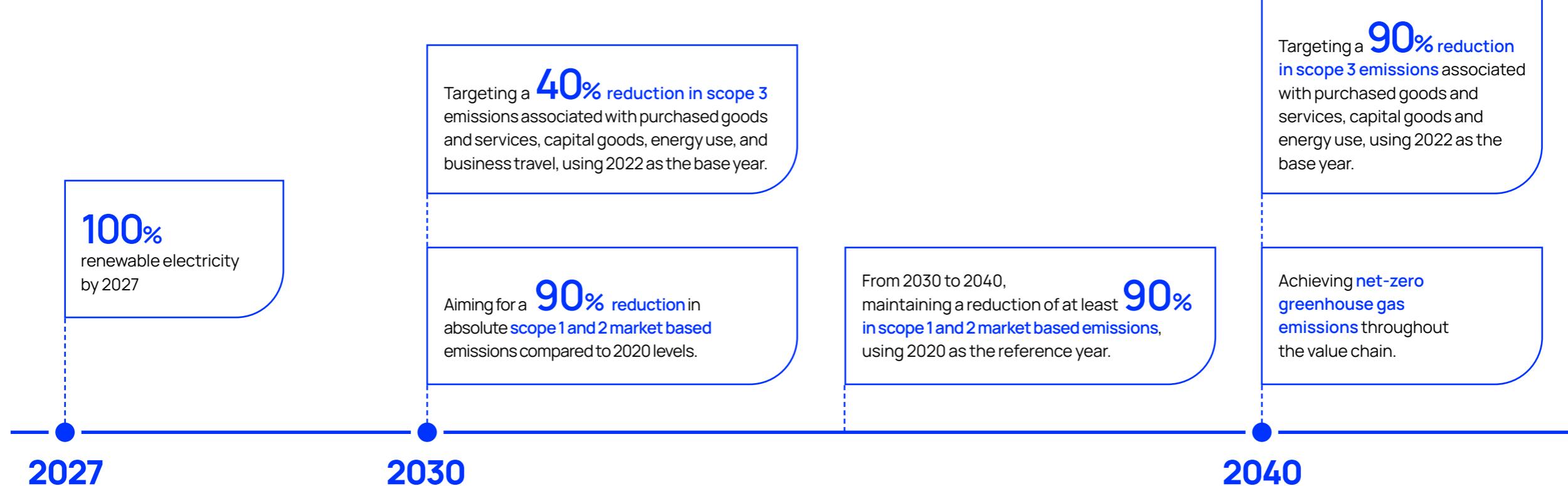
Resilience & adaptation to climate change



# Advancing towards net-zero emissions

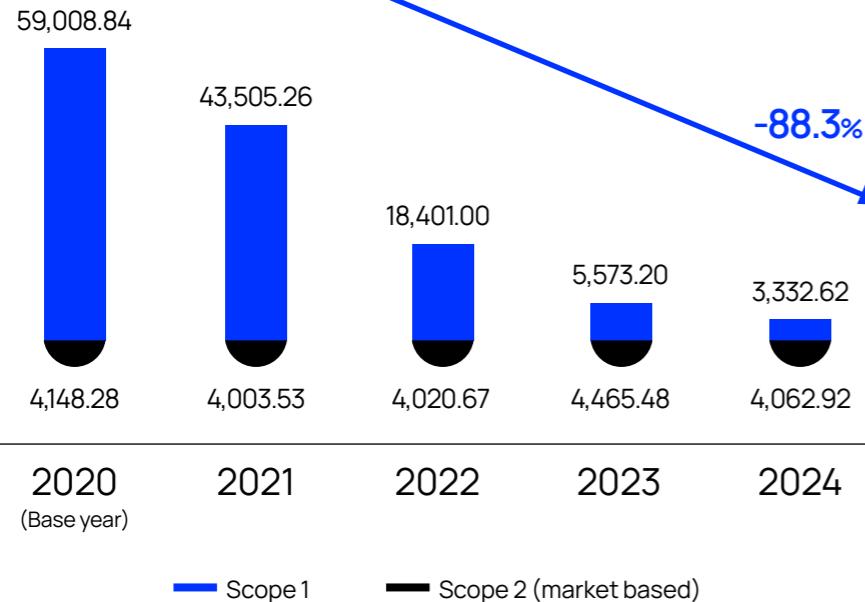
Nova, as part of United Group, is aligned with and actively contributes to the United Group's Net Zero Targets and roadmap, remaining committed to decarbonizing its operations. United Group has established both near-term and long-term emissions reduction targets, aiming to achieve net-zero emissions by 2040. These targets were validated by the Science Based Targets initiative (SBTi) in 2023, holding the group accountable for its environmental performance. The base year for these targets were chosen because they represent the first years with a full inventory and portray a normal operating year.

## Our plan to align with a net zero economy

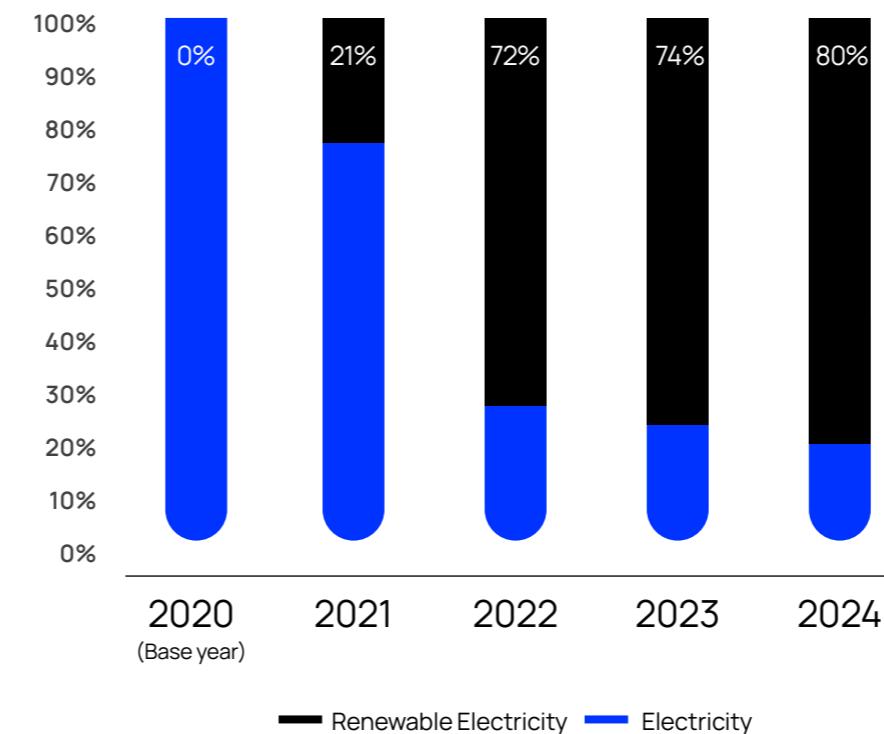


## Nova's progress towards targets<sup>1</sup>:

### Progress towards our scope 1 & 2 market-based target

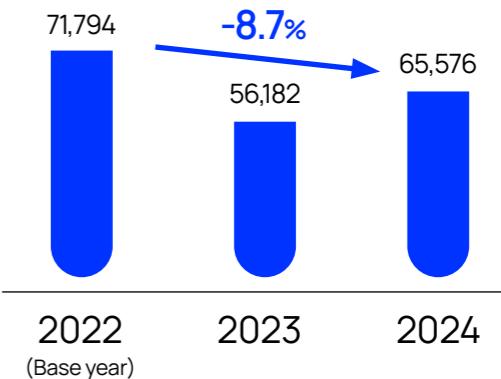


### Renewable Electricity (%)

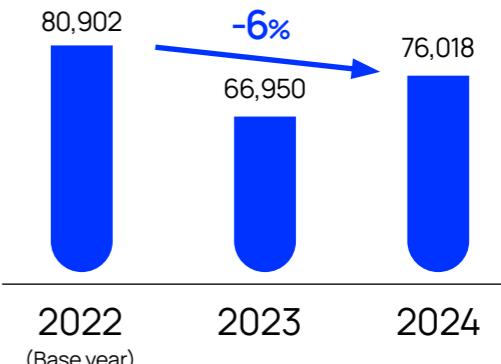


### Progress towards our scope 3 target

(Covering categories 1, 2, 3 and 6)



### Total scope 3 emissions



1. No recalculations have been made to the base years in 2024.



Nova implements targeted actions to support United Group's net-zero strategy, to minimize its environmental footprint, enhance energy efficiency, and support the decarbonization efforts. These actions include:

#### Energy Efficiency Measures

Nova optimizes energy consumption across its offices, data centers, and operational facilities by adopting advanced energy management systems and energy-efficient upgrades, such as LED lighting and improved HVAC. Moreover, Nova remains committed to increase the energy efficiency of its fleet, with the aim to achieve a fully green fleet by 2030.

#### Transition to Renewable Energy

Nova procures most of its electricity from renewable sources, supporting United Group's goal of achieving 100% renewable electricity by 2027.

#### Supplier Engagement and Sustainability

Nova will encourage suppliers to align with sustainability goals, contributing to United Group's 2030 target of 50% adopting SBTi-approved carbon reduction plans and extending impact beyond its operations.

#### Innovation in Telecommunications

Nova will leverage its role in the telecommunications sector to support sustainability innovations, including energy-efficient 5G, smart metering, and smart city solutions that lower energy consumption and carbon emissions.

Finally, understanding the importance of our employees in achieving our environmental objectives, we actively inform, train, and engage with them. In 2024, we conducted a training session focused on Nova's sustainability efforts. It addressed the related risks and opportunities and provided an in-depth overview of each pillar of ESG. The session also covered critical environmental topics such as emissions across all scopes, waste management, carbon neutrality, and the role of carbon credits. Furthermore, it highlighted the United Group's net zero targets, to which Nova contributes, along with updates on Nova's own progress toward meeting these shared objectives.

## Energy Management

Energy efficiency is a fundamental aspect of our environmental responsibility. In the context of the ISO 50001-certified energy management system, we conduct regular energy audits to identify significant energy uses and adopt reliable performance indicators to monitor and evaluate our energy performance. We are committed to continuous improvement by setting clear objectives and targets aimed at enhancing energy efficiency. This approach enables us to reduce energy consumption and greenhouse gas emissions while also improving overall operational performance. Our energy consumption is categorized as direct consumption, which represents the electricity and fuels that are directly charged to Nova, and indirect consumption, which represents the energy used by the Company when operating in third-party facilities and is indirectly attributed to Nova. To transparently report on its environmental performance, Nova includes both direct and indirect consumption in its energy and GHG emissions indicators.



## Energy efficiency initiatives

Several actions have been implemented to decrease our overall energy consumption and make our operational processes more efficient, as illustrated below. Despite the ongoing development and expansion of our network infrastructure which leads to increased energy demand, the measures we implement allow us to achieve greater energy efficiency in our operations. Our focus areas along with the results achieved in 2023 & 2024 are presented below:

**1** We are upgrading critical power equipment by replacing outdated electromechanical systems with cutting-edge, energy-efficient technologies that enhance reliability and operational efficiency.

**2** We are replacing critical power and comfort systems with energy-efficient HVAC technologies, integrated into a Building Management System (BMS), to enhance overall energy performance and operational efficiency.

**3** We are transitioning from traditional physical infrastructure to cloud-based systems.

**4** We are optimizing our facilities by reconfiguring building programs to better meet the needs of employees and the requirements of equipment, thereby improving overall resource efficiency.

**5** We are consolidating our Data Center (DC) equipment sites, to significantly reduce the amount of installed equipment at third-party provider sites through physical co-location consolidation.

**6** We have installed smart energy meters in our Data Centers to monitor and record power usage.

**7** We are upgrading our company fleet by transitioning to greener alternatives, including electric vehicles (EVs), plug-in hybrid electric vehicles (PHEVs), with the aim of increasing the share of green vehicles to over 20% of our total fleet and ensuring at least 25% of new additions are green, as part of our goal to achieve a fully green fleet by 2030.



## Our Energy Efficiency Improvements in Focus

In 2023 and 2024, we have made focused efforts to consolidate our buildings facilities, which include offices, data centers and other technical buildings, in more energy efficient infrastructure. These efforts have resulted in:



Reduction of 3.7 GWh in our direct energy consumption and a total reduction of 4.9 GWh when accounting for both direct and indirect consumption.

In the next five years, we will consolidate our Data Centers E/M infrastructure needs based on ageing, operational condition, spare parts and support availability, efficiency, and ESG performance. The scope of our work includes equipment and installation/swap services for the following:

- ◆ Close Control Air Conditioners
- ◆ UPS Systems
- ◆ Rectifiers Systems
- ◆ Inverters Systems



Energy saving upon full plan implementation of 2.53 GWh (721tn/year CO<sub>2</sub> emissions reduction).

We gradually replace our fleet with low emissions vehicles, reducing our energy consumption & emissions as well as our reliance on fossil fuels.



In 2024, 40% of the newly leased or purchased vehicles were low emission vehicles while in total, low emission vehicles represent 17.78% of the Company's fleet.

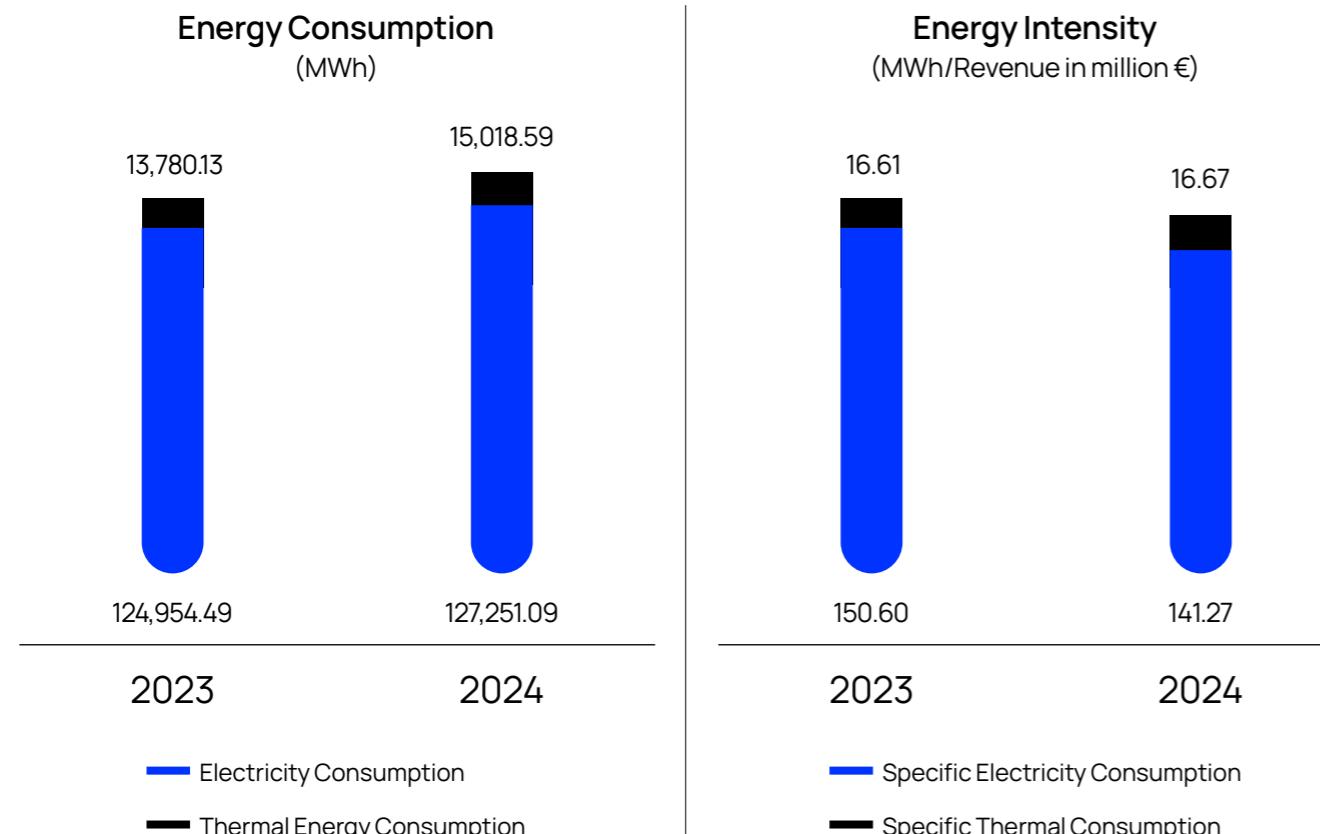
The energy reductions have been calculated by comparing the year over year energy consumption since the measures were implemented last year and concern electricity consumption. No specific tools are used however it is assumed that the reduction in energy consumption from the building facilities is directly attributed to the initiatives of Nova.

Finally, understanding the importance of reducing energy demand downstream our supply chain, we design products that require less energy, helping our customers lower their own energy use. Notably, our EON TV screensaver feature helps customers save around 2,200 MWh each year by automatically reducing energy consumption when the TV is not actively in use. This reflects our commitment to creating innovative products that support a more sustainable future.

# Performance & Metrics

In 2024, the Company's total energy consumption amounted to 142,270 MWh, with electricity representing 89% of the total, and base stations and the outside network in particular accounting for 57%.

The total energy consumption along with the energy intensity is presented in the table and graphs below.



Energy Consumption (MWh)	2023	2024
Diesel for Power Generation	10,564.11	11,157.50
Diesel for Vehicle Fleet	2,529.90	2,892.59
Gasoline for Vehicle Fleet	676.33	968.50
Liquefied Petroleum Gas (LPG) for Vehicle Fleet	9.80	-
<b>Total Fuel Consumption from Non-Renewable Sources</b>	<b>13,780.13</b>	<b>15,018.59</b>
<b>Total Fuel Consumption from Renewable Sources</b>	<b>0</b>	<b>0</b>
Base Stations	64,401.62	70,313.28
Technical Buildings	5,477.26	6,632.93
Data Centers	22,791.86	20,468.21
Offices & Shops	1,918.48	562.98
Outside network	9,866.79	11,171.38
3rd Party Charged Electricity	20,498.47	18,102.31
<b>Total Electricity Consumption</b>	<b>124,954.49</b>	<b>127,251.09</b>
<b>Total Energy Consumption within the Organization</b>	<b>138,734.62</b>	<b>142,269.68</b>
Energy Intensity (MWh/Revenue in million €)	167.21	157.94
Energy Intensity (MWh/PB of Data Transported)	40.99	37.10

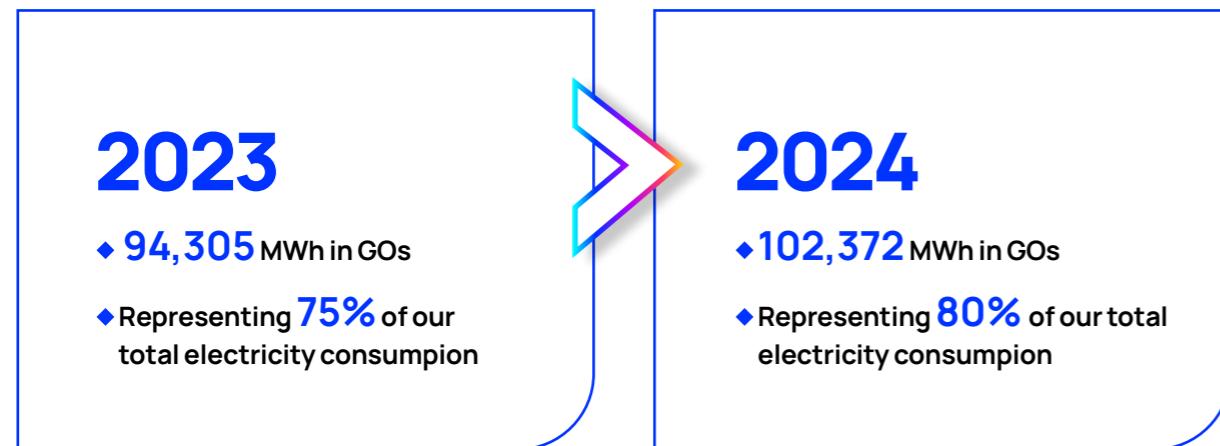
For thermal energy, the fuels consumed were converted to energy units using the conversion factors published by DEFRA 2024. The company does not purchase or use any heating, cooling or steam and does not sell any electricity, heating, cooling or steam. The energy intensity covers the total energy consumption within the organization. Additionally, the total electricity and energy consumption for 2023 has been recalculated to ensure consistency with the most updated data.

# Greenhouse Gas Emissions

Recognizing the impact that anthropogenic greenhouse gas (GHG) emissions have on the climate, at Nova we place a strong emphasis on reducing our total carbon footprint. Through our comprehensive approach we identify key emission sources and take focused action to achieve meaningful decarbonization across our operations and value chain.

## Greenhouse Gas Mitigation Efforts

Recognizing that electricity represents most of our operational energy consumption, we seek solutions to reduce our scope 2 emissions by increasing renewable energy in our energy consumption mix and improving the energy efficiency of our facilities. As part of these efforts, each year we purchase Guarantees of Origin (GOs) through our energy supplier that cover the majority of our electricity consumption. More specifically, in 2023 and 2024 we covered all our direct electricity consumption with GOs and part of indirect electricity consumption<sup>2</sup>.



2. The numbers presented include both the GOs purchased and those given at no cost to consumers by DAPEEP.



Moreover, our efficiency initiatives have also led to a sizeable decrease in energy use, subsequently decreasing our greenhouse gas emissions. Finally, to reduce our scope 1 emissions, we are also upgrading our diesel generators and increasing the number of low emission vehicles in our fleet.



**37,712 tnCO<sub>2</sub>e**

Reduction in scope 2 Market-Based Emissions through the procurement of GOs.

**1,801 tnCO<sub>2</sub>e**

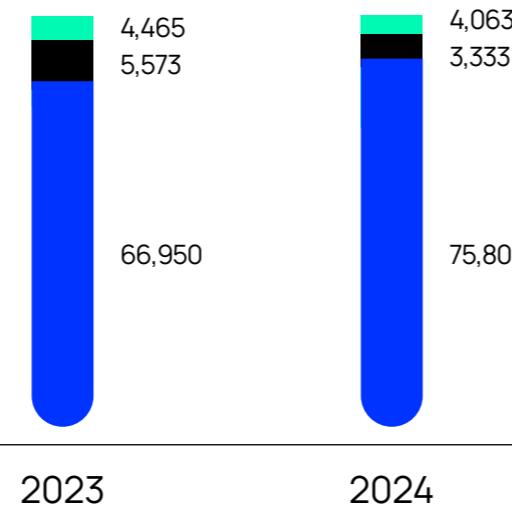
Reduction in 2024 GHG emissions from our energy efficiency initiatives.

# Performance & Metrics

To accurately assess our carbon footprint, we calculate emissions from sources under our operational control. These are categorized as scope 1 emissions and include direct emissions from our vehicle fleet and the use of diesel generators, and scope 2 emissions which cover indirect emissions from purchased electricity. In line with the requirements of the Greek National Climate Law, every year our scope 1 and 2 emissions are externally verified, ensuring the accuracy of our reported values. Additionally, as a subsidiary of United Group, we calculate our indirect scope 3 greenhouse gas emissions from upstream and downstream activities across our value chain. While we do not have direct oversight of these emissions, we recognize their significant role in contributing to our environmental impact. In order to focus on the most significant emission sources, an assessment of scope 3 categories has been carried out, and we have identified categories 1-8 and 11-14 as relevant and categories 1 and 2 as the most significant. Our total emissions for 2023 and 2024 are presented in the graphs and tables below.



**Greenhouse Gas Emissions**  
(tnCO<sub>2</sub>e)



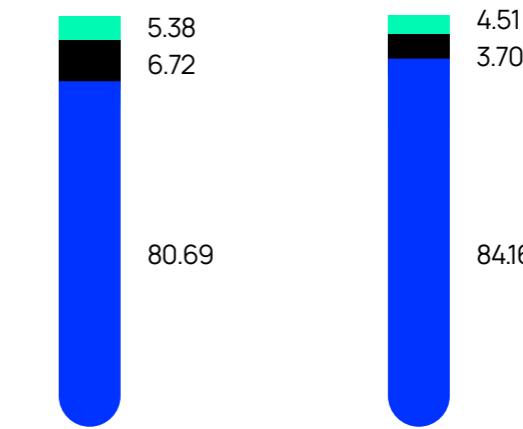
2023

2024

- Scope 3 Emissions
- Scope 2 Emissions - Market Based
- Scope 1 Emissions



**Greenhouse Gas Emissions Intensity**  
(tnCO<sub>2</sub>e/Revenue in million €)



2023

2024

- Scope 3 Intensity
- Scope 2 Intensity - Market Based
- Scope 1 Intensity

GHG Emissions (tnCO <sub>2</sub> e)	2023	2024
Scope 1	4,465	4,063
Scope 2 - Location Based	35,744	37,329
Scope 2 - Market Based	5,573	3,333
Category 1: Purchased Goods and Services	45,743	38,083
Category 2: Capital Goods	8,647	25,501
Category 3: Fuel and Energy Activities	1,780	1,623
Category 4: Upstream transportation	780	929
Category 5: Waste generated in operations	4	30
Category 6: Business travel	12	151
Category 7: Employee commuting	1,216	586
Category 8: Upstream leased assets	7,011	5,885
Category 11: Use of sold products	573	1,096
Category 12: End-of-life treatment of sold products	56	54
Category 13: Downstream leased assets	476	487
Category 14: Franchises	652	1,385
Scope 3	66,950	75,808
Total Emissions - Location Based (tnCO <sub>2</sub> e)	107,160	117,200
Total Emissions - Market Based (tnCO <sub>2</sub> e)	76,989	83,204
Total Emissions Intensity - Location Based (tnCO <sub>2</sub> e/Revenue in million €)	129.16	130.11
Total Emissions Intensity - Market Based (tnCO <sub>2</sub> e/Revenue in million €)	92.79	92.37
Total Emissions Intensity - Location Based (tnCO <sub>2</sub> e/PB of Data Transported)	31.66	31.41
Total Emissions Intensity - Market Based (tnCO <sub>2</sub> e/PB of Data Transported)	22.74	22.30



In the figures above all greenhouse gases have been included and have been converted to CO<sub>2</sub> eq. values using AR6 GWP factors and Nova doesn't produce any biogenic emissions in its emissions inventory. The scope 3 categories 9, 10 and 15 are not applicable to the operations and activity of Nova and no other indirect emission sources have been identified. The emissions inventory is consolidated using an operational control approach in line with the requirements and guidance outlined in the Greenhouse Gas Protocol. Scope 1 emission factors are sourced from DEFRA and IPCC, scope 2 emission factors are sourced from DEFRA, IEA and AIB, and scope 3 emission factors are sourced from DEFRA, IEA, LCAs and IPCC. No additional tools were used. All the aforementioned methodologies, conversion factors and approaches are also applied to the base year calculations for Scope 1,2 and 3.

# Responsible Waste Management

Responsible waste management is an important aspect of our operations and our approach to environmental stewardship. Most of our generated waste results from upgrades to our base stations or the dismantling of older stations, with smaller quantities being generated from data centers and our offices. We aim to limit the production of both hazardous and non-hazardous waste, while promoting material recovery through recycling initiatives.

## Waste reduction and management initiatives

We monitor and record our waste ensuring its management is carried out in accordance with environmental regulations. Waste generated from our operations is collected and segregated, while subsequent handling is carried out safely in collaboration with specialized and licensed waste management partners.

Additionally, we promote sustainable practices within our workplace, informing our employees about office waste management procedures

encouraging active participation in reducing waste and maintaining a clean, efficient work environment.

To further support our sustainability goals, we explore innovative ways to extend the lifespan of our devices and reduce electronic waste. We implement initiatives that promote environmental responsibility, including recycling programs as well as digital solutions to reduce resource consumption.

### Minimizing our Waste

#### Reduce Waste

Optimizing resource utilization, promoting a reduction in the waste generated from our operations.

#### Manage Waste

Focusing on diverting our generated waste from landfills through our network of licensed partners.



#### Recycling Programs

We collect mobile phones, batteries, and other household items via our stores and through dedicated programs for the collection of devices, batteries, light bulbs, and clothing, reinforcing employee and public engagement in responsible waste management practices.



#### Sustainable Solutions

We introduced the new eSim and Half Sim cards, embracing innovative and environmentally friendly solutions in telecommunications. The eSim offers a fully digital alternative to the traditional SIM card, with simple activation and zero waste, while the Half Sim uses 50% less plastic and reduces CO<sub>2</sub> emissions by 25% without compromising service quality.

In addition, over 90% of our customers use the e-Bill service, reducing paper consumption and further reducing our environmental footprint.



## Performance & Metrics

In 2024, we generated a total of 322.83 tonnes of waste, with the majority of the reported quantities are managed by licensed partners and diverted from landfill. Although waste generation has increased due to upgrades of data centers and base stations, we ensure that all materials are properly recycled or recovered through effective waste management processes. Through our efforts we ensure we stay on track to achieve our long-term goal of diverting 100% of our waste from landfills by 2030.

### Percent of Waste Diverted from Landfill

**92% in 2023** ➤ **84% in 2024** ➤ **100% 2030 Target**

	Waste Categorization (tn)	Total Generated		Directed to Disposal		Diverted from Disposal	
		2023	2024	2023	2024	2023	2024
Hazardous Waste	Batteries	96.86	156.83	-	-	96.86	156.83
	Electronic equipment	36.40	47.68	-	-	36.40	47.68
	Hazardous Waste (Oil)	4.85	4.84	-	-	4.85	4.84
Non-Hazardous Waste	Cables	-	0.54	-	-	-	0.54
	Paper/Cardboard	11.24	26.4	-	-	11.24	26.40
	Scrap metal	2.18	1.4	-	-	2.18	1.40
	Wood	31.24	33.26	-	-	31.24	33.26
	Mixed office waste	16.11	51.59	16.11	51.59	-	-
	AC Filters	-	0.30	-	-	-	0.30
	Clothes	2.52	-	-	-	2.52	-
<b>Total Hazardous Waste</b>		<b>138.11</b>	<b>209.35</b>	<b>0.00</b>	<b>0.00</b>	<b>138.11</b>	<b>209.35</b>
<b>Total Non-Hazardous Waste</b>		<b>63.29</b>	<b>113.48</b>	<b>16.11</b>	<b>51.59</b>	<b>44.66</b>	<b>61.89</b>
<b>Total</b>		<b>201.40</b>	<b>322.83</b>	<b>16.11</b>	<b>51.59</b>	<b>185.29</b>	<b>271.24</b>

The waste has been aggregated and categorized based on the European Waste Catalogue using invoices from licensed partners. All waste is managed off-site by licensed partners, with waste directed to disposal being landfilled while waste diverted from disposal being recycled. No other reuse, recovery, incineration or disposal operation is applied to the waste generated by Nova.

## Safeguarding Biodiversity

At Nova, we are committed to minimizing the impact of our activities on local ecosystems, even though biodiversity has not been identified as a material topic. Our efforts include conducting biodiversity assessments, protecting sensitive habitats, and supporting conservation initiatives in the areas where we operate. Biodiversity assessments are carried out as part of our licensing procedures. We monitor the percentage of our sites located within recognized conservation areas. Specifically, in 2024 5.8% of assessed sites were within the Natura 2000 network, a European Union-wide system of protected areas aimed at preserving rare and threatened species and habitats. For nationally protected areas (CDDA), which include National Parks, Wildlife Refuges, and Landscape Protection Areas, many Natura sites simultaneously fall under national protection status, while others belong exclusively to one of the two categories. Management is carried out by the competent authorities. When a station is located within both a Natura area and a nationally protected area, the opinion of the relevant authorities is issued through the Environmental Impact Assessment (EIA) procedure, whereby the Regional Authority forwards

the file to the competent bodies for consultation. If a station is located only within a nationally protected area, compliance is ensured through the competent authorities, such as the Forest Service for Wildlife Refuges, or local planning offices for approval by the Architectural Council (AC) for works situated in traditional settlements, historic sites, archaeological areas, or landscape protection zones.

Consequently, there are currently no available data indicating how many stations are located within these areas. However, EETT (NRA) is preparing a new version of the SILYA platform (electronic system where applications for antenna construction permits are submitted), which will enable searches for stations located within Natura areas through a dedicated criterion, either within the Natura 2000 network or within nationally protected areas (CDDA). When a site is located within or near a sensitive area, we implement appropriate measures to safeguard the area and minimize or reverse potential impacts. It is worth noting that all our installations in natural or remote areas are stationary antenna structures, without mechanical components or moving parts that could disturb or harm wildlife.



# Our impact on Society

# 03

Our contribution to the SDGs:



## Our People at a Glance

At the heart of our long-term success lies our commitment to our people. We recognize that our employees are not just contributors to our operations, but key drivers of innovation, resilience, and sustainable growth. We believe that they play a pivotal role in our journey and contribute to shaping the future we strive to create. We safeguard labor

rights, respect collective bargaining agreements, while promoting open communication between employee representatives and Management to ensure a fair and transparent workplace for all.

Our people-oriented approach is based on the provision of equal opportunities, with the aim to

create their own career path and face the challenges that our sector demands. Code of Business Conduct and Ethics shapes our approach by aligning all United Group members with shared values and culture. It sets clear standards on inclusion, diversity, and respectful workplace behavior. At the same time, Nova's Policy against violence and harassment

reinforces this approach by ensuring zero tolerance, preventing risks, and promoting a safe and respectful workplace for all. Having implemented policies and procedures, investing in training and development and fostering diversity and inclusion, we cultivate a work environment that strengthens success and continuous improvement.

Employee distribution by gender

**2023**  
841



MEN

**2024**  
821



**2023**  
530



WOMEN

**2024**  
511

## Employee distribution by contract

	2023		2024	
	Men	Women	Men	Women
Full time	831	528	815	501
Part time	10	2	6	10
Permanent	831	528	819	508
Fixed-term	10	2	2	3

## Employee distribution by hierarchical level and age 2024

	Board of Directors	Leadership	Management	Employees
<30	0	0	1	54
30-50	1	4	156	729
51+	1	4	101	281

## Employee distribution by gender and age

	2023			2024		
	<30	30-50	51+	<30	30-50	51+
Men	34	573	234	32	533	256
Women	25	404	101	23	357	131

In 2024, 286 employees were covered by collective agreements, while the rest fall under the provisions of the National General Collective Labour Agreement (NGCLA). At the same time, there were 25 freelancers and 3 employees through staff leasing. Moreover, regarding the numbers presenting they are calculated as headcount at the end of the reporting year (31.12.2024).

## Employee distribution by hierarchical level and gender

	2023				2024			
	Board of Directors	Leadership	Management	Employees	Board of Directors	Leadership	Management	Employees
Men	2	6	174	659	2	6	174	639
Women	0	2	81	447	0	2	84	425

# Cultivating an Inclusive and Diverse Work Environment

Diversity and inclusion are a crucial aspect of our operation. We attempt to encourage our people to express themselves to their work environment, providing equal opportunities for recruitment and development into the Company. At the same time, through our policies and procedures, we encourage them to report any incident of discrimination, fostering transparency, accountability and promoting respect.

## Code of Business Conduct and Ethics

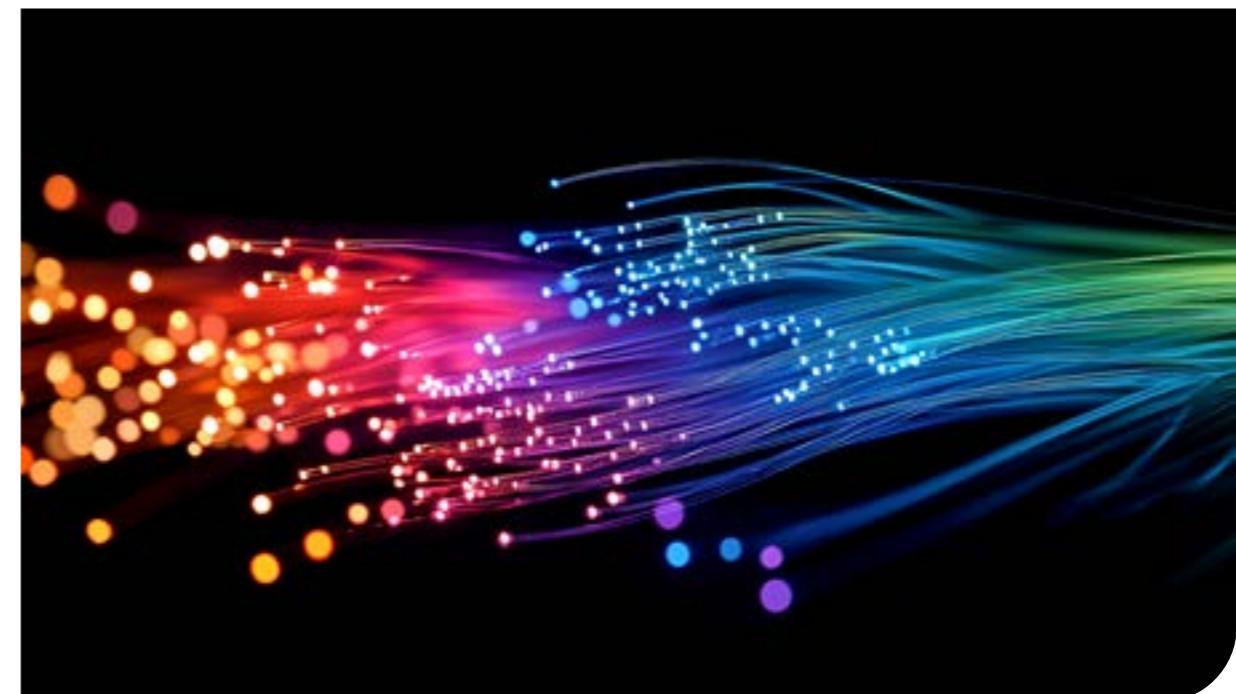
Code of Business Conduct and Ethics is the cornerstone of our operation, ensuring alignment with Nova's values and culture. The Code applies to all executives, managers, employees, and interns associated with any entity directly

or indirectly controlled by United Group. The Code outlines in a clear way aspects regarding inclusion, diversity and harassment, providing guidance on appropriate and acceptable behavior in the workplace.

## Policy against violence and harassment

Nova's Policy against violence and harassment reflects our commitment to zero tolerance to any form of violence and harassment in the workplace, promoting respect of everyone's personality. The Policy aims to identify potential

risks, define and implement appropriate prevention and protection measures, and promote employee information and awareness-raising initiatives to ensure a well-informed and engaged workforce.





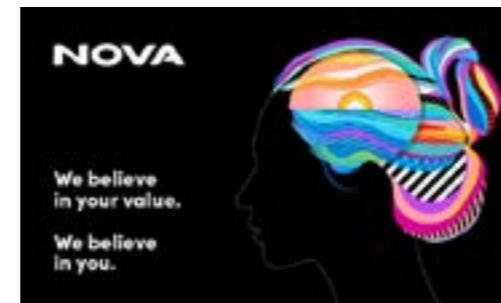
## Nova Women

Gender equity is a top priority at Nova, as we attempt to support our women employees to reach their full potential. The "Nova Women" initiative showcases our commitment and highlights the comprehensive approach we follow. Though our practices we strive to support women to the multiple aspects of their personal and professional life, listen to their needs and empower them to achieve the balance they aspire to. The initiative is structured through the following pillars:



### Empowerment

We believe in continuous development and inspire our women through trainings, inspirational talks and reverse mentoring.



### Wellness

Through our benefits we support wellness and secure an inclusive working environment for all our employees.



### Family

With the aim of supporting their personal life we provide additional benefits:

- ◆ **Child Care allowance** of €140 per month for each child until they begin primary education
- ◆ **An additional 5 days of leave** for mothers to be, beyond what is provided by current legislation
- ◆ **Extension of reduced working hours** by three additional months, beyond legal entitlements, for the parent making use of childcare leave
- ◆ **Full remote work flexibility** for new parents to be present for important moments in their child's life (up to the age of 6).

Nova has signed Diversity Charter, staying focused on its commitment to promote and support diversity and inclusion.



**25%**  
women at leadership positions



**38.4%**  
are women



## Creating a Talented Workforce

At Nova we invest in the recruitment of new talented, highly skilled employees that will offer added value to our team. Our goal is to connect the most suitable person to each position, as a result we attract people from various channels, externally and internally. The Hiring Manager communicates with the HR Business Partners to identify the needs, and after that new job opportunities are posted to the intranet, where every employee has access to review potential employee interest in internal transfer.

Regarding external recruitment, job opportunities are published on our website, LinkedIn and other career websites. Applications are evaluated and most suitable candidates are invited to attend interviews with the Human Resources Department as well as the department's head.

Employee recruitment by gender and age						
	2023			2024		
	<30	30-50	51+	<30	30-50	51+
Men	24	124	16	16	78	14
Women	17	51	1	12	38	4

Employee departures by gender and age						
	2023			2024		
	<30	30-50	51+	<30	30-50	51+
Men	10	146	33	9	94	25
Women	16	97	25	7	58	8

In 2024 the total turnover was 15%. The voluntary turnover was 8.4% and the involuntary turnover was 6.6%. In 2024, the new hires turnover was 12.2%.

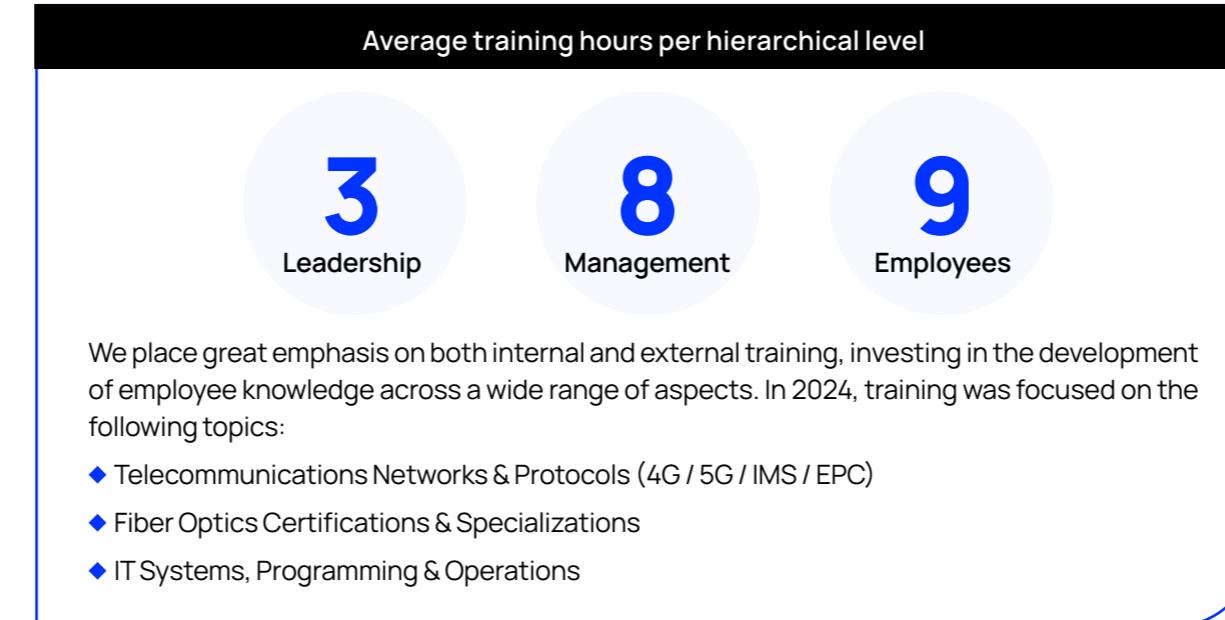
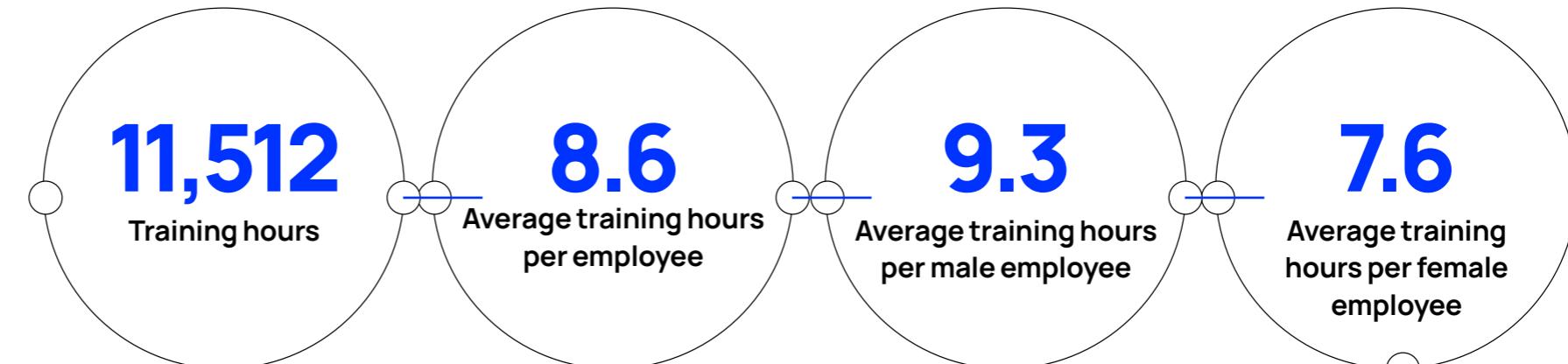
### Creating a talent pool

Recognizing the significance of young talent, that have the appropriate soft and hard skills is crucial for creating a high-skilled and well-trained workforce, we provide career opportunities to the graduates and students. At the same time, we participate in career days of universities and organizations strengthening our connection with new candidates.

## Investing in Training

Upskilling and reskilling remain vital to our approach in order to create a specialized workforce that will contribute to the Company's strategic goals, while ensuring excellent customer service for our clients.

With the aim to foster their hard and soft skills, we attempt to conduct both internal and external training, while our LMS platform further supports training regarding Company's procedures. Our commitment to employee training starts from the first month, during which all employees receive training regarding anti-corruption, Basic Data Protection and the Code of Conduct. Moreover, department-specific induction training is conducted to facilitate smooth and effective integration into their new team and job role.



**+73%**

**Increase in training hours compared to 2023**

# Employee Engagement

Engagement with our employees allows us to build long-lasting relationships based on mutual trust and respect. We have implemented open communication channels that foster dialogue and support employees to communicate their concerns and issues that may have been raised. Nova has implemented the following communication channels:

- ◆ Intranet
- ◆ Newsletter
- ◆ Townhalls
- ◆ Top 200 quarterly meetings
- ◆ Whistleblowing mechanism
- ◆ Employee Unions
- ◆ Employee Opinion Survey

## Employee Opinion Survey

At Nova we conduct employee opinion survey in order to record employee perspective about several issues, such as intradepartmental collaboration, benefits and work-life balance. Through the survey we have the opportunity to implement targeted actions that allow us to continuously improve our performance and create a competitive and attractive working environment. More specifically, we create “quick win action plans” that help us to immediately implement corrective actions.



## Flexible Work and Flexy Entrance Program

Nova's Flexy Work and entrance program allows employees to work remotely up to two days per week, while allows flexible entrance to the office.



## Nova for you

We have implemented “Nova for you” program that includes a benefits package for all our people that includes:

- ◆ Life insurance, including disability and accident coverage
- ◆ Group health insurance, with the option to include family members
- ◆ Biannual health check-up for all employees
- ◆ Access to services and products at preferential rates
- ◆ On-site restaurants/cafeterias in Athens and Kallithea offering meals at reduced prices
- ◆ Exclusive discounts and special offers at various shops and businesses



## Nova friends & family

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



## Culture-Building and the #NovaOneTeam Initiative

Throughout 2024, Nova organized a series of team engagement events aimed at reinforcing the “NovaOneTeam” culture and bringing people together across the organization.

Highlights included the “Sustainability Day” at the Benaki Museum, which combined awareness-raising with creativity, as well as a mid-year summer event and corporate review at “Ploes”.

The year wrapped up with a warm end-of-the-year gathering and strategic review at the Nasioutzik Estate, offering teams the chance to reflect, reconnect, and celebrate shared achievements.

# Occupational Health and Safety

Occupational Health and Safety is a top priority, aiming at creating a working environment that is safe and promotes employees' health. With a primary focus on preventing occupational accidents and work-related illnesses, the Company implements a comprehensive Occupational Health and Safety Management System, certified in accordance to ISO 45001: 2018.

This system provides a structured framework for the ongoing identification, assessment, and management of workplace risks. It ensures compliance with legal requirements and supports the continuous improvement of working conditions through the establishment of specific targets performance indicators. Additionally, it promotes ongoing communication and consultation with employees, fostering a culture of shared responsibility.

## Health and Safety Policy

At Nova we have implemented a Health and Safety Policy that showcases our commitment to preventing potential occupational hazards, mitigating risks and complying with the applicable legislation.

### Communication with employees

Communication with employees remains vital for the identification and monitoring of potential occupational risks. We foster effective, two-way communication and support them to raise their concerns. The dedicated problem-reporting system, Jira, accessible to all staff, supports the immediate report of their concerns regarding facilities and working conditions. At the same time, everyone can communicate potential hazards via email or verbally, helping to the prevention of potential incidents, while anonymous reports may also be submitted via the whistleblowing mechanism. Furthermore, daily communication with employee Union allows us to receive valuable feedback, be informed and implement the appropriate corrective actions on-time.

### Identification of occupational hazards and risk assessment

At Nova we conduct Occupational Risk Assessment Studies for each job category to identify, analyse and assess potential hazards and risks that are connected to each job position. Moreover, through regular facility inspections we detect and address potential hazards, mitigating risks and fostering safety, while developing detailed safe working instructions tailored to each operation. The goal is to ensure that our employees are aware of the hazards and risks

that are connected to their job and comply with personal protective measures.

### Emergency Response

Acknowledging the significance of emergency preparedness and response, we have established Emergency Response Teams. These teams receive regular training in firefighting, first aid, and emergency procedures, provided by experts from the Fire Service and the Safety Technician/ Occupational Physician. Moreover, they are actively engaged in the evacuation drills which are scheduled on a yearly basis.

### Employee Training

Training is crucial for raising employee awareness and further solidifying our safety culture, supporting the prevention of potential incidents. As there are job positions, directly associated

with specific hazards, targeted trainings are conducted regarding these aspects, such as Working at Height. Furthermore, in collaboration with external partner, trainings are conducted regarding fire safety and First Aid Support.

In 2024, evacuation team training was conducted. The training covered essential workplace safety guidelines, fire prevention and firefighting, building evacuation procedures, and first aid. Each team member completed 8 hours of training, with a total of 64 participants.

### Safety Performance Monitoring

Focusing on continuous improvement, we monitor health and safety indicators to ensure that appropriate measures are implemented and any potential issues that may arise are effectively managed.

	Health and Safety Indicators	
	2023	2024
Employees	Total working hours	2.566.962
	Number of high-consequence incidents	0
	Rate of high-consequence incidents <sup>3</sup>	0
	Number of recorded work-related injuries	5
	Total recordable injury rate <sup>4</sup>	1.9
	Number of employee fatalities	0

3. The High-Consequence Incident Rate is calculated by dividing the number of high-consequence incidents by the total annual number of employees working hours and multiplying the result by 1.000.000.

4. The Total Recordable Injury Rate is calculated by dividing the total number of recorded work-related injuries by the total annual number of employees working hours and multiplying the result by 1.000.000.

# Our Social Responsibility Footprint in Motion



At Nova, we implement a Corporate Responsibility Plan with a clear goal to actively contribute to sustainable development, utilizing technology, know-how and cooperation with the authorized bodies as catalysts for positive change for the environment and society.

Our approach is based on a coherent framework of initiatives and actions aimed at empowering local communities and addressing environmental challenges. Our contribution to society is an integral part of our business strategy and mission.

In 2024, in response to the escalating environmental crisis and the impact of forest fires in Greece, we launched the €1 million corporate responsibility program, aiming at environmental restoration and civil protection through the assistance of technology.

Within this framework, we proceeded to:

- ◆ Large-scale restoration projects of burned areas, such as in Evros (Dadia) and Rhodes, with the aim of future natural regeneration and the prevention of flooding phenomena.

- ◆ Innovative civil protection solutions, such as "Smart Forest" projects, which utilize Artificial Intelligence, sensors, drones and GIS data for prevention, early notification and effective crisis management.
- ◆ Continuous consultation and being part of the public debate on the climate crisis and resilience, through collaborations with statutory bodies and think tanks.
- ◆ Mobilization of internal environmental monitoring and information mechanisms, aiming at the continuous enhancement of environmental awareness within the organization.

Our approach focuses on the long-term protection of the natural environment and the development of infrastructures that empower local communities. Nova's flagship CSR program supports environmental restoration and protection through the use of advanced technology, ensuring a sustainable future for both people and nature.

## Smart Forest Rhodes



Nova's management, together with the, at the time, Greek Minister of Environment and Energy, Theodoros Skylakakis, announced in summer 2024 the launch of the "Smart Forest Rhodes" initiative, an effort dedicated to protecting the island's environment and biodiversity. Fully designed, developed and funded by Nova with the aim of offering it to the island of Rhodes for the protection of the Natura 2000 "Butterflies" valley, the project features the installation of an AI-powered fire prevention and management system.



This initiative is part of our broader post-disaster recovery program, through which we have already carried out key restoration works in both Dadia National Park, Rhodes and Attica's Mount Penteli. These projects are supporting the natural regeneration of fire-affected areas, with visible progress already being visible on the ground, and with the aim of moving from a reactive model of environmental restoration after disasters, to a proactive model of Civil Protection with the use of high-tech technology.



## Restoration Works in Dadia, Evros



# 23,587

meters of log erosion barriers and 245 m<sup>2</sup> of wooden barriers have been offered by Nova for the restoration project in Dadia



Acting as a Restoration Contractor of the Ministry of Environment and Energy, Nova, committed more than 50% to the financing of anti-corrosion protection projects in the Dadia National Park in Evros from the 1-million-euro program for restoration projects after the natural disasters of 2023.

Based on an approved study by the Forestry Department of Soufli and the Forestry Directorate of Evros and in collaboration with a scientific team and certified foresters of the Forest Labor Cooperative, Nova financed and implemented forest protection projects. Utilizing natural materials and using natural methods, the sustainable management of the natural resources of the area was maximized.

## Restoration of Fire Affected Areas in Rhodes



**86** km  
of log erosion barriers and 35 logs,  
the donation of Nova for the restoration of burnt  
areas in Rhodes



According to data from the competent authorities, in the summer of 2023, a forest area corresponding to 15% of the total was destroyed on the island of Rhodes. Faced with the magnitude of the disaster, Nova, with innovative solutions and optimism for the restoration of the area, proceeded with a series of anti-corrosion works.

Nova, in collaboration with the General Directorate of Forests and Forest Environment of the Ministry of Environment and Energy, implemented soil stabilization and protection projects. Within the framework of the Corporate Responsibility program, the goal is to protect the forest areas' natural regeneration.



# Reforestation of the Holy Monastery of Penteli

In 2024, Nova undertook a landmark initiative to restore the Monastery of Penteli, devastated by the August 2023 Attica's wildfires, demonstrating its dual commitment to environmental stewardship and cultural heritage. The Monastery, a site of profound historical and religious significance, including its late Byzantine architecture, the Interorthodox Center of the Church of Greece, and exhibitions on education and Bible teaching during the Ottoman period, became the focus of an extensive reforestation project. In collaboration with state and local authorities, Nova planted 5,400 trees across 70 acres of burnt forest, ensuring the revitalization of both the natural landscape and the preservation of a treasured historical landmark.



## From land to sea - Nova's Family Day on Marine Life

In July 2024, Nova hosted a "Family Day" for employees and their families, centered on environmental education at the ARCHELON Sea Turtle Rescue Center in Glyfada, Attica. Participants learned about sea turtle biology, observed the care and rehabilitation of injured turtles, and gained insight into the critical role of biodiversity in sustaining marine ecosystems. Highlighting its commitment to marine conservation, Nova symbolically adopted a sea turtle named "Toucan," found near Zakynthos with a head injury, and assumed responsibility for all associated medical, nutritional, and rehabilitation costs



## Social Solidarity - Donations

In 2024, Nova continued its commitment to social responsibility through meaningful acts of solidarity, providing support to citizens impacted by natural disasters, vulnerable communities, and organizations dedicated to social welfare. The company's contributions reflected a consistent focus on technology accessibility, inclusion, and support for essential community work.

During the year, Nova supported multiple educational institutions and child-welfare organizations by offering connectivity solutions and technological equipment to enhance learning environments and access to digital tools. Schools, including the Special Primary School of Corinth and the 34th Primary School of Athens, as well as smaller educational entities such as the Primary School of Arkoi, received equipment or services aligned with their specific needs.

Support was also extended to organizations working with children and vulnerable groups, including SOS Children's Villages, The Smile of the Child, ELEPAP, Ark of the World, the Chatzikyriakio Child Protection Foundation, and the "O Sotir" Orphanage of Kefalonia. Nova also continued its collaboration with public institutions such as the City of Athens Reception and Solidarity Center (KYADA) and the "Agia Sofia" Children's Hospital / "Elpida" Pediatric Oncology Clinic, providing communication services that strengthened their operational capacity.

In addition to organizational support, Nova provided direct assistance to individuals facing hardship, including families affected by natural

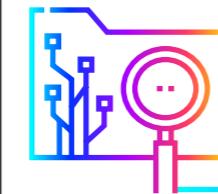
disasters and citizens in vulnerable circumstances, ensuring continued communication access during critical periods.

Further reinforcing its social impact approach, Nova hosted its annual Christmas charity bazaar in December, offering financial support to children's organizations through both proceeds from the event and matched corporate donations. Participating NGOs included ELEPAP, The Smile of the Child, and SOS Children's Villages.

Through these initiatives, Nova reaffirmed its role as an active and responsible corporate citizen, prioritizing connectivity, inclusion, and support for communities in need.



## Projects with Social Impact



### CASE STUDY > ENVIRONMENTAL VIGILANCE WITH "SMART" TECHNOLOGY

At Nova, we see technology not just as a tool, but as a catalyst for meaningful change. Through our business projects, we are actively shaping a smarter, more connected, and more sustainable future powered by artificial intelligence, next-generation networks, and advanced digital solutions, guiding progress across a wide range of sectors such as culture, public safety, urban development, and environmental conservation

Driven by technology, knowledge and collective action, we aim to be an active ally at every critical moment for the environment and society. A beacon of hope and innovation has been the "Hymettus Smart Forest" program, the first ICT (Information and Communication Technology) project in Greece that has been proven effective in terms of early warning and consequently the prevention and aversion of fires through the use of surveillance cameras,

drones, and "smart" smoke detection sensors, making Artificial Intelligence a valuable ally in the elimination of fires.

Through the systematic study of the economic and social impact of fires, Nova has utilized its expertise in technology and know-how in the direction of environmental protection, proceeding with a series of actions with great impact on society.

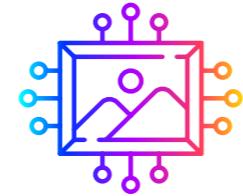
The "Hymettus Smart Forest" is an example of how innovation can serve society in a holistic way. Its success enhances Nova's position as a pioneer in the use of technology to protect the environment, leading the way for the repetition and expansion of similar actions on a national level. Through this approach, it is clearly proven in action that technology, when used with vision and responsibility, can be a means of prevention, security and sustainable development.





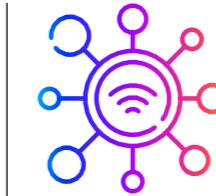
## Smart City Infrastructure: Smart Trikala project

The “Smart Trikala” initiative is part of the broader strategic plan, “restart mAI city,” aimed at enhancing Trikala’s smart city infrastructure. Through this project, Nova is committed to delivering tangible improvements to citizens’ daily lives while positioning Trikala as a national benchmark for innovation, technological advancement, and entrepreneurship. Nova, in collaboration with Dotsoft, signed in 2024 a contract for the development of the “Smart Trikala” project at the Ministry of Digital Governance, in the presence of Minister Dimitris Papastergiou. The agreement was signed by the Mayor of Trikala, Nikos Sakkas, alongside the CEOs of Nova ICT and Dotsoft, Alexandros Bregiannis and Tasos Manos, respectively.



## Culture and Digitization: Digital Museum of Salamina

In 2024, Nova developed Greece’s most comprehensive [digital cultural park](#) in the historic island of Salamina, leveraging AI tools, advanced audiovisual systems, and next-generation networks. Hosted at the Municipal Library of Ampelakia “Maria Kantari” and supported by the Attica Region, the project features a digital museum that celebrates the island’s rich history and cultural heritage. Through this initiative, Salamina’s pivotal role in the foundations of Western civilization is brought to the forefront, while simultaneously preserving historical memory, promoting local culture, and enhancing the island’s visibility and tourism appeal through cutting-edge technology.



## Minimizing individual vehicle use: Smart Connectivity in efood

Nova was selected in 2024 to provide efood, Greece’s largest online food delivery platform and a subsidiary of Delivery Hero, with 8,200 IoT connections. These high-performance IoT data solutions support efood’s remote workers, delivery vehicles, and external collaborators, ensuring reliable connectivity for mobile operations, network backup, and coverage in remote locations.

Nova’s adaptable IoT ecosystem also streamlines critical processes from order placement to delivery, generating actionable insights that optimize operations, reduce waiting times, minimize unnecessary calls, and enhance routing efficiency, ultimately improving service performance across the platform. This initiative encourages users to prefer delivery services over individual vehicle use, promoting lower emissions and enhanced sustainability. It further enables efood to manage resources and waste effectively, swiftly adapting to shifting demands and resource availability, and contributing positively to both environment and society.

# Sponsorships with a Social Footprint

We consistently invest in sponsorships that support culture, innovation, and societal progress, reinforcing our identity as a company deeply rooted in the communities we serve. This commitment goes far beyond corporate responsibility, it reflects our core belief that meaningful engagement with society plays a vital role in shaping a more inclusive, creative, and forward-thinking future.



## Supporting the Cinematic Art

In 2024, Nova reaffirmed its commitment to promoting cinematic arts and supporting cultural development in Greece through key sponsorships. The company proudly served as Official Communication Sponsor of the 24<sup>th</sup> French-Language Film Festival, marking its eighth consecutive year of support and also sponsoring the Jury Award, bringing French-language cinema to audiences across multiple cities including Athens, Thessaloniki, Larissa, Patras, Chania, Kavala, and Kastoria. Additionally, Nova was the Main Sponsor of the 30<sup>th</sup> Athens International Film Festival Opening Nights, celebrating three decades of cinematic excellence and showcasing the talents of Greek filmmakers. Through these initiatives, Nova strengthens Greece's cultural landscape, encourages creative expression, and fosters positive social impact in local communities.





## Supporting Technology and Innovation

Technological advancements are the epicenter of the country's path to its digital transformation. Nova supported in 2024 state-of-the-art technological summits, to actively contribute to the country's digitization and the education and familiarization of young professionals and companies with breakthrough technological capabilities, the advancement of AI and their merits.

In 2024, Nova ICT reinforced its commitment to innovation and technological advancement through key sponsorships. As Gold Sponsor of the **2<sup>nd</sup> International Conference on Technology and Innovation**, themed "The Future of Digital Health Today," the company highlighted its role in advancing healthcare solutions, including the Integrated Oncology Information System by IDIKA, leveraging AI and the National Cancer Registry to improve patient care. Simultaneously, Nova ICT served as Platinum Sponsor and Challenge Owner at the **A.I Makeathon by UNI AI**, an interdisciplinary Hackathon that brought together talented university students from across Greece to develop creative AI-driven solutions, fostering collaboration, applied learning, and the next generation of technological talent.



## Supporting Greece's iconic Open-sea sports

In 2024, Nova reinforced its commitment to sports by serving as the official broadcaster and communication sponsor for two premier sailing events. The company supported the **4<sup>th</sup> AEGEAN 600** for the second consecutive year and the **61<sup>st</sup> International Aegean Sailing Rally** for the 11th time, both organized by the Hellenic Offshore Racing Club (HORC). These prestigious events brought together experienced sailors competing over demanding courses, including 350 nautical miles of challenging waters, highlighting skill, endurance, and the spirit of competitive sailing. Through its sponsorship, Nova continues to promote athletic excellence and support Greece's vibrant sporting culture.



## Conferences and Forums

In 2024, Nova actively participated in leading conferences and forums to showcase its innovation, **digital transformation** initiatives, and commitment to social responsibility. In the digital transformation space, the company took part in the **7<sup>th</sup> Conference on Digital Transformation and Business Development**, the **Digital Economy Forum 2024** of SEPE, the **28<sup>th</sup> Annual Economist Government Roundtable**, the **Advanced Telecoms Summit 2024** and the **Infocom Conference 2024**, presenting flagship AI projects, including

a nationwide civil protection application and the National Cancer Registry, highlighting Fiber-to-the-Home (FTTH) deployment, 5G and tech developments, and emphasizing the integration of AI and the importance of regulatory frameworks. Additionally, Nova promoted talent mobility and career opportunities at **Career Day in Düsseldorf**.

At the Social Responsibility and Sustainability forefronts, Nova

participated in the **22<sup>nd</sup> Americal Hellenic Chamber of Commerce Corporate Responsibility Conference "The Pale Blue Dot"**, the **2<sup>nd</sup> Conference "Effective Dialogue – Reality Check – Exploring Business and Social Contribution"**, and the **"3<sup>rd</sup> ESG Conference"** by Cleon Conferences.

Through these engagements, Nova reinforces its role as a leader in digital innovation, responsible growth and sustainability.

## Customer Experience

Nova places strong emphasis on delivering high-quality customer service across all its interaction points, resulting in enhanced customer experience. The Company operates an extensive network of physical stores throughout Greece, which serve as accessible touchpoints for customers and potential customers seeking in-person support, device assistance, or service upgrades. Concurrently, Nova invests in maintaining a consistent and reliable service experience through its call centers, digital self-service platforms, and customer relationship teams, thereby honoring its core values while also providing a seamless support experience and strengthening customer loyalty.



### Customer Satisfaction

With customer satisfaction as a central priority, Nova's services have been improved through the modernization of telecommunications, integrated service offerings, and process simplification. Notably, free SIM card replacements were also made available to legacy network customers requiring access to advanced 4G+ and 5G networks. An initiative was launched to refine the customer journey, focusing on network performance, social media interaction, and the integration of real-time customer feedback. Additionally, the bundling of mobile, fixed-line, and TV services allows customers to access multiple services through a single provider, which promotes long-term relationships with new and existing subscribers while also supporting seamless connectivity, enhanced productivity, and on-demand entertainment.

# Anti-Piracy & Protection of Digital Content

The security of customers, of the company and of the creators of content is at the heart of Nova's interest. Implementing the company's commitment to the continuous development of its digital infrastructure in the context of good governance and responding to the new challenges that are emerging in the modern digital space, the content protection department has been launched since 2023 to support this cause.

The department takes several actions to protect the content and manage the related risks, such as:



**Combating illegal digital flows** through advanced technological techniques, such as **IP & Domain Blocking**



**Continuous search for online content** infringement incidents with immediate activation of **notice and takedown** procedures under the **DMCA**.



**Participation in actions to raise awareness** about the phenomenon of piracy, its socio-economic impact and ways to deal with it.



Nova fully complies with the guidelines of the National Telecommunications and Post Commission (E.E.T.T.), which is the independent national regulatory authority for electronic communications and works closely with other providers to implement the guidelines and protect the content.



Nova, as a member of the United Group, is a partner of the Audiovisual Anti-Piracy Alliance (AAPA) par9cipa9ng in ac9ons and developments for the protection of copyright at a pan-European and international level.

In the context of its actions, Nova has strategic cooperation with institutional bodies, such as the Hellenic Police (EL.AS.) and the prosecutorial authorities and also with organizations such as E.E.T.T., E.P.O.E. and A.A.P.A.:



Nova is an active member of the Society for the Protection of Audiovisual Works (EPOE) in Greece, an organization that aims to protect the copyright of all creators. In collaboration with EPOE and other content providers, it implements a wide range of actions to protect their copyrights.

All these actions underline the company's fundamental values of **healthy, safe entrepreneurship, ethical integrity, respect for creation, sports and culture, and responsibility** towards society, institutions and the content creator.

The continuous monitoring of ever-increasing technological risks and the implementation of repressive measures to protect critical assets, which are the result of the group's large investments in audiovisual works and pay-tv, are fully aligned with the Sustainable Development Goals (SDGs) for **fairness, strong institutions and responsible consumption**.

Investing in protecting content from breaches also helps **improve the customer experience** by ensuring that they have access to legitimate, safe, reliable, and high-quality services. This reduces the risk of the customer being exposed to malicious actions from illegal pirated streams, while enjoying a **legal, competitive, constantly growing product with an investment footprint that is rewarding for society, the creative industry, jobs and the environment**.

By protecting the content, the **economy that contributes to its production is also protected**, and at the same time this protection has a positive effect on the market, creating an environment of **fair commercial practices and healthy competition**, while finally contributing substantially to the fight against tax evasion and the movement of money outside the legal market.



## Awards and Distinctions

In 2024, Nova's commitment to innovation, sustainability, and operational excellence was recognized through a series of prestigious awards. Highlights include the [Best City Awards](#) for initiatives in social responsibility, sustainability, social solidarity, and forest restoration; the [Compliance Awards](#) for the effectiveness of its comprehensive Compliance Program and whistleblowing tools; the [Peak Awards](#) and [IAB MIXX Awards](#) for creative, data-driven, and technology-driven marketing campaigns; and the [Mobile & IoT Connected World](#) recognition for the Smart Forest project and broader digital initiatives protecting and promoting Mount Hymettus. These accolades reflect Nova's leadership in integrating responsible practices, cutting-edge technology, and societal impact across its operations.



### [Best City Awards](#)

[Gold Medal](#) in the category "Responsibility and Solidarity Programs".

[Silver Medal](#) in the category "Information Systems & Projects for Early Warning and Risk and Emergency Management".



### [2024 Compliance Awards](#)

[Silver Award](#) in the Best Compliance Platform category for our "Support and Reporting Line," a secure and reliable whistleblowing tool that serves both internal and external stakeholders.

[Bronze Award](#) in the "Best Compliance and Ethics Project" category, recognizing our firm and ongoing commitment to a Zero Tolerance policy toward bribery and corruption.



## Peak Awards 2024

**Gold Award** for Best Digital Multi-Channel Campaign Performance, for our campaign “Nova EON TV”, which achieved a 68% increase in conversions through behavioral insights and persona-driven targeting.

**Gold Award** for Best Demand Generation Campaign, for “Demand Gen 3Play”, where creative experimentation led to more than double the online conversions.

**Gold Award** for Best Christmas Campaign, for “This Christmas... all of Greece tunes in to EON.”

**Silver Award** for Best Digital Multi-Channel Campaign Performance, for “Nova Dialing Up Success”, which resulted in a 71% uplift in mobile plan leads.

**Bronze Award** for Best Media Efficiency Strategy, for our “Nova 5G Phone TikTok Smart Performance Campaign: From Alpha to Excellence.”

Awards were received together with Nova’s advertising partner Tempo OMD



## IAB MIXX Awards 2024

**A Gold Award** in the Strategic Search Engine Optimization and Marketing category for the campaign “Wind Becomes Nova – The Google Ads Merger Saga.”

**Gold Award** in the Best Use of Emerging Technologies category for “Nova goes GREEN in digital media.”

**Bronze Award** in the Best Data-Driven Marketing Campaign category for “Nova Rebranding” campaign.

Awards were received together with Nova’s advertising partner Tempo OMD.



## 14<sup>th</sup> Mobile & IoT Connected World 2024

Best Civil Protection Project award for our project “Smart Forest” for Nova ICT (consortium with Satways, in collaboration with SPAY – Hymettus Protection and Development Association).

# Sound Governance

# 04

# How we are Governed

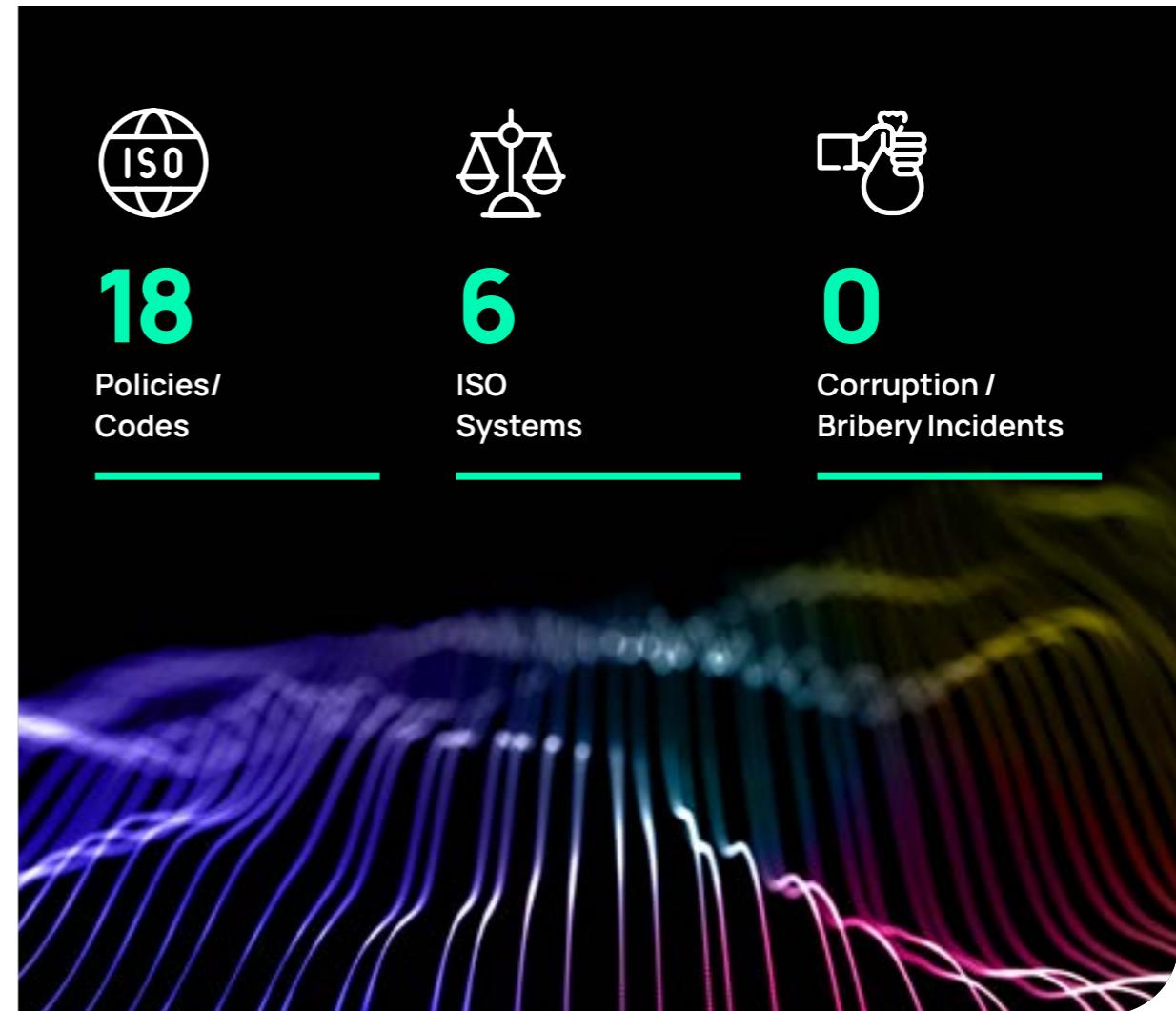
Corporate governance at Nova is embedded in its commitment to transparency, responsible growth, and shareholder trust. As part of the United Group, the highest standards of ethical conduct, risk management, and regulatory compliance are adopted. The Board of Directors sets the overall strategic direction and with the support of the BoD Committees, they all oversee performance and impact along with the competent Management Team, supported by both clear decision-making processes and robust internal controls. Nova is building a resilient and future-ready organization that is aligned with the United Nation's Sustainable Development Goals, through open stakeholder engagement, transparent reporting, and comprehensive policies.

## Sustainable and Responsible Management

Nova embraces sound corporate governance not only as a regulatory requirement, but also as a core enabler of responsible business conduct and long-term value creation. The Company's governance approach is grounded in transparency, integrity, and the continuous pursuit of sustainable growth. To this end, it maintains a clear and agile governance structure, with decision-making processes that ensure accountability, effective risk oversight, and compliance with the applicable legal and regulatory frameworks.

The Company prioritizes stakeholder trust through open communication and regular disclosure of both financial and non-financial information. Its Code of Conduct applies to employees and partners alike, promoting fairness and ethical behavior at all levels.

To make certain that sustainability considerations are integrated at the highest level, Nova offers regular educational programs for its senior leadership, specifically for the top 180 executives.



# Board of Directors

Nova is governed by a three-member Board of Directors\*, appointed in accordance with the Company's Articles of Association and applicable legislation, and is composed of the following members<sup>5</sup>:

Name	Role
Stanley - Phillip Miller	CHAIRMAN OF THE BOARD
Georgios Lamprou	CEO OF NOVA, CFO AND BOARD MEMBER
Kyriaki Silvestriadou	CEO OF NOVA MEDIA AND BOARD MEMBER

\*18/12/2025

The Board is responsible for the company's strategic oversight, ensuring responsible decision-making, transparency, and alignment with Nova's mission and values. Its composition reflects a lean governance structure, facilitating agility in strategic direction and oversight, while also it plays a central role in supervising and monitoring both operational performance and broader sustainability impacts.

The nomination and selection process of Nova's Board of Directors and its committees is conducted through a structured and transparent process, in accordance with the applicable corporate legislation and its Articles of Association. Candidates are evaluated based on their professional expertise, strategic insight, and ability to contribute to effective governance.

## Performance and Oversight

In 2024, Nova recorded no critical concerns raised to the highest governance body, demonstrating the effectiveness of preventative measures and early detection mechanisms. The Compliance Department continues to monitor the helpline's performance for Nova, promote its visibility, and improve employee awareness through regular compliance communications and training.

5. Represents the current BoD members.

# Management Team

Nova's Board has delegated responsibility for the day-to-day execution and business operations to its dedicated cross-functional management team that is represented by women at 40%, as is shown in the table below:

## Nova's Management Team\*

Giorgos Lamprou	CHIEF EXECUTIVE OFFICER AND CHIEF FINANCIAL OFFICER OF NOVA
Kyriaki Silvestriadou	CHIEF EXECUTIVE OFFICER OF NOVA MEDIA
Alexandros Bregiannis	CHIEF EXECUTIVE OFFICER OF NOVA ICT
Kelly Anastasopoulou	CHIEF PRODUCT OFFICER
Vasilis Vasilakis	CHIEF INFORMATION OFFICER
Manolis Grigorakis	CHIEF TECHNOLOGY OFFICER
Antonio Ivankovits	CHIEF OPERATING OFFICER
Nikos Kastanas	HR EXECUTIVE DIRECTOR
Martha Kesisoglou	CORPORATE AFFAIRS EXECUTIVE DIRECTOR
Dimitris Magkos	B2B EXECUTIVE DIRECTOR
Katerina Maniadaki	CHIEF LEGAL & REGULATORY OFFICER

\*1/11/2025

# Conflict of Interest

As part of the UG Group, Nova adheres to the United Group Conflict of Interest Policy, which applies to all Board Members and decision-makers within the organization. Annual confirmations by key individuals with decision-making authority that affirm their commitment to uphold impartiality, transparency, and fairness in their roles, are mandated by the Policy. Any real, potential, or perceived conflicts must be disclosed using a formal Online Register of Interest Form, while in cases of urgency, such disclosures should be made directly to the Compliance Department. Unless formal approval is granted at that time, Nova's members are required to refrain from participating in decisions for which conflicts may exist.

# Supporting Committees

The Board of Directors of Nova is assisted by the following dedicated committees:



## Senior Management Committee

Comprised by the CEO, Chief Officers and Executive Heads, this committee supports day-to-day decision-making across Nova. It addresses pressing business matters, resolves issues, and shapes operations-level priorities, therefore, ensuring alignment with Board directives and stakeholders' expectations.



## Investment Committee

Tasked with the ex-ante evaluation and decision-making regarding all significant capital expenditures and corporate investments, excluding financial instruments. This permanent Committee convenes twice per month—or more frequently if required—and includes the Chief Executive Officer, Chief Financial Officer, and Supply Chain Executive Director.



## ESG Committee

The ESG Committee guides the development of ESG initiatives, reviews performance against established objectives, and supports transparency in sustainability reporting. The Corporate Affairs Executive Director is the Head of the Committee.



## DPO Committee

The Data Protection Committee is composed by the CEO, Chief Legal & Regulatory Officer, Chief Technology Officer, Chief Information Officer, Chief Product Officer and HR Director as permanent members. The Corporate Affairs Executive Director, B2B Executive Director and Marketing Director attend the meetings depending on the items in the agenda. The Committee oversees compliance-related matters, data protection impact assessments (DPIAs), management of data breach incidents, strategic decisions related to personal data processing. The DPO of the company reports to that Committee. The Committee meets on a quarterly basis, or may be convened by DPO or Management on an ad hoc basis, as required.

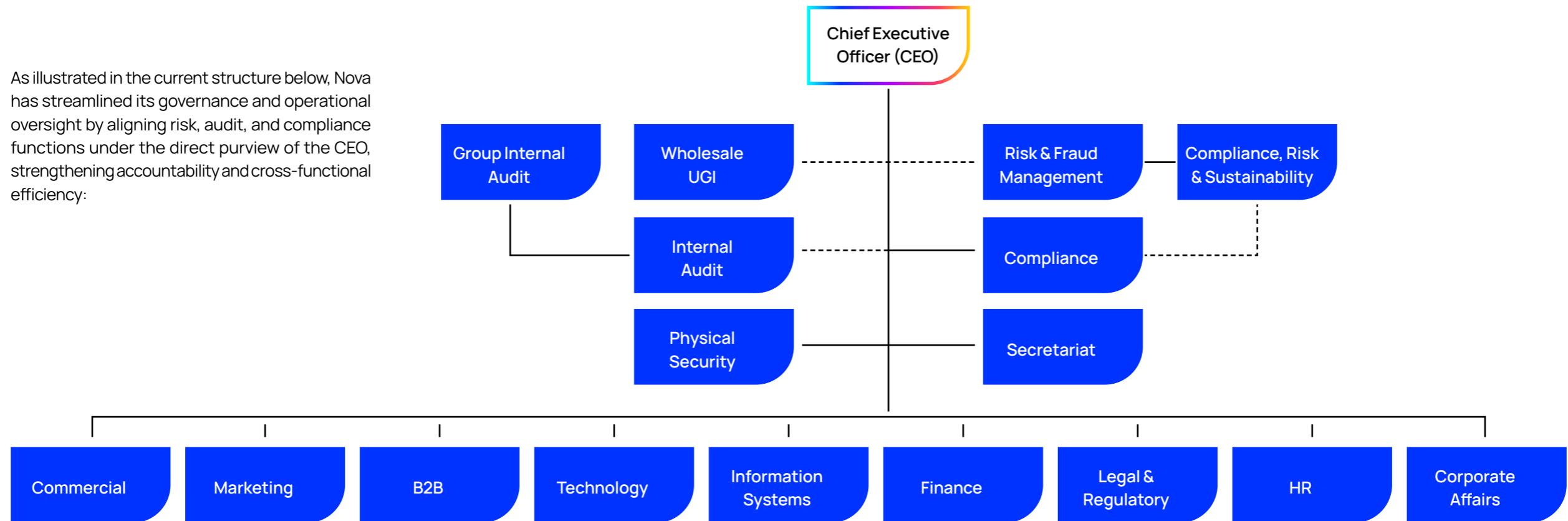


## Special Committee on Information Security & Personal Data Collection Management Committee

Specialized Committee that oversees the on-going management of Nova's information security and data protection policies, including the effective implementation of these policies by employees, maintaining confidentiality, data integrity, and regulatory compliance. The committee acts as the central authority for related policy governance across the group, proposing improvements to information security controls within corporate systems and processes. Its members include individuals from the Senior Management Committee, the Data Protection Officer (DPO), and the Head of the Information Security Department. Nova's DPO also serves as the liaison to supervisory authorities and data subjects, supporting GDPR compliance and advisory matters.

# Our Organizational Chart

As illustrated in the current structure below, Nova has streamlined its governance and operational oversight by aligning risk, audit, and compliance functions under the direct purview of the CEO, strengthening accountability and cross-functional efficiency:



# Business Model

The sustainable business model outlined below reflects Nova's approach to long-term value creation, grounded in environmental, social, and governance considerations.

## Key Partners

- ◆ Franchisees
- ◆ Content providers
- ◆ Cloud platform providers
- ◆ Cybersecurity experts
- ◆ Industry associations and certification bodies

## Key Activities

- ◆ Operation and maintenance of fixed and mobile telecommunication networks
- ◆ Pay TV services (e.g., EON)
- ◆ Professional management contracts
- ◆ Datacenter services

## Value Proposition

Nova's value proposition lies in delivering secure, high-quality, and integrated telecommunications and media services that enhance daily life for both individuals and businesses.

With a strong focus on digital transformation, the Company provides customized offerings supported by robust technical infrastructure, certified management systems, and a responsive service model. This combination ensures convenience, trust, and long-term customer engagement.

## Customer Relationships

- ◆ Omnichannel customer support
- ◆ Satisfaction surveys e.g., "Close the loop" initiative

## Customer Segments

- ◆ Individuals Business (B2B)

## Cost Structure

- ◆ Capital investments in network infrastructure expansion
- ◆ Content licenses
- ◆ Network maintenance
- ◆ Operational costs, e.g., advertising, personnel, energy

## Key Resources

- ◆ Network infrastructure
- ◆ Data centers
- ◆ Human capital
- ◆ Intellectual property
- ◆ Proprietary and UG knowhow

## Competitive Advantage

Nova's competitive advantage stems from its integrated service model, which unites telecommunications, media, and digital services under a single trusted brand.

Nova also distinguishes itself through its strategic investments in business continuity, data protection, and energy efficiency, offering reliable service delivery in a competitive market.

## Communication Channels

- ◆ Nationwide retail stores
- ◆ Online platforms
- ◆ Call centers
- ◆ Direct sales representatives
- ◆ Self-service portals

## Revenue Streams

- ◆ Subscription-based revenue from mobile, fixed-line, internet, and pay-TV services
- ◆ Value-added services
- ◆ Franchisees' royalties
- ◆ Equipment sales and device financing options through retail stores

## Cost Structure

- ◆ Environmental impact from telecom devices e-waste, vehicle fleets, energy consumption, and physical retail operations
- ◆ Social risk from digital divide and network access inequality which Nova actively attempts to curb

## Environmental - Social Benefit

- ◆ Empowering digital inclusion and connectivity in underserved regions through on-going network expansions
- ◆ Support for community initiatives, sponsorships, and inclusive workplace initiatives

## Internal Audit

The Internal Audit Department operates as an independent assurance function, reporting directly to the Board of Directors. Its role is to assess the adequacy and robustness of Nova's internal control systems, with a focus on compliance, operational integrity, and risk mitigation. By evaluating governance frameworks and risk management practices, the Department ensures that business processes align with internal policies and agreed

objectives. While business units are responsible for implementing policies, and retain ownership of system design and operations, Internal Audit offers valuable oversight, aiding in proactively identifying gaps and fostering overall accountability. This function supports continuous improvement and fosters a culture of transparency and control across the organization, while all its relevant members are adequately trained and informed.



## Privacy and Data Protection

Respecting the privacy of customers, employees, and stakeholders is a cornerstone of Nova's governance principles. Aligned with the GDPR and national regulations, its practices ensure transparency, fairness, and security across all processing activities.



## Nova's Data Protection - Key Aspects

Respecting the privacy of customers, employees, and stakeholders is a cornerstone of Nova's governance principles. Aligned with the GDPR and national regulations, its practices ensure transparency, fairness, and security across all processing activities.

### Lawful Processing

Nova processes personal data in compliance with legal requirements, maintaining transparency toward its subscribers. Data is processed solely for legitimate and clearly defined purposes, such as fulfilling contractual obligations, enabling billing, delivering customer service, or safeguarding network security.

### Data Minimization and Accuracy

Nova follows the principle of data minimization by collecting only the data necessary for the specified purposes. The Company ensures data accuracy and keeps information up to date, taking corrective action to amend or delete inaccuracies as needed.

### Security Measures

The Company has implemented robust technical and organizational measures to protect personal

data, including secure data storage systems, restricted access, and regular reviews of security protocols to mitigate risks such as unauthorized access, loss, or damage of data.

### Data Subject Rights

Nova upholds subscribers' rights by enabling access, rectification, deletion, restriction, and portability of personal data. The Company is committed to addressing all data-related requests in a timely manner, ensuring compliance with GDPR requirements.

### Data Retention

The Company has established a clear data retention policy, storing personal data for only as long as necessary to meet specific legal or operational requirements. Once the data is no longer necessary, it is securely deleted in accordance with established procedures.

## Incident Management

In the event of a data breach, Nova has established procedures to respond swiftly and notify the relevant authorities about the incidents, aiming to minimize the impact on individuals and complying with legal obligations.

## Risk and opportunity management

Nova maintains a comprehensive and structured approach to risk and opportunity management, designed to support the achievement of its objectives while ensuring resilience across operations. The Company applies United Group's centralized Enterprise Risk Management (ERM) Framework, which is integrated across all Operating Companies, including Nova, to foster consistency and transparency.

In order to effectively manage risks, the Board of United Group has established a governance structure that includes a Risk Charter, Policy, and Methodology. Those documents serve as the foundation of Enterprise Risk Management, outlining the responsibilities of key stakeholders, setting the guidelines for managing risks and providing the reasoning behind the techniques to be used to identify, assess, and respond to risks and opportunities.

Risk management at Nova is aligned with internationally recognized standards, including



the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework and ISO 31000, ensuring a robust foundation for identifying, assessing, mitigating, and monitoring a broad spectrum of risks. Moreover, integrated in Nova's strategy are climate considerations, that foster a future-oriented mindset, addressing risks and opportunities, whilst integrating efforts to transition to a low carbon economy.

An end-to-end approach to risk management is adopted, engaging both local entities as well as group functions in the risk assessment process. The Risk function ensures coordination across all entities, promoting a culture of risk awareness and accountability, while fostering collaboration and knowledge sharing throughout the Group's entities. This approach enables each entity to contribute to overarching sustainability objectives, including emissions reduction, energy efficiency improvements, and supporting customers in lowering their carbon footprint.

The risk management process is comprised of the following four phases:

### ◆ Risk Identification and Categorization

This phase involves the identification of risks that could potentially impact the United Group, through obtaining relevant information from a wide range of sources, including but not limited

to interviews, historical data, industry reports, new regulations, and best practices. A top-down approach is employed, where significant risks are identified by United Group management, ensuring that the organization's strategy and risk appetite are integrated into the process. Identified risks are categorized systematically into strategic, operational, financial, technological, legal and regulatory, compliance, and environmental categories. This categorization allows for a structured and consistent evaluation across business units. Risks are recorded in a dedicated Risk Register that includes, *inter alia*, risk descriptions, cause analysis, existing controls, impact likelihood scoring, mitigation strategies and responsible risk owners. Simultaneously, to enhance our understanding of climate-related risks, since 2022 we conduct scenario analyses based on different climate scenarios and time horizons. This analysis helps us evaluate the potential impacts of climate change on our operations, strategy, and financial performance. We consider the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) in conducting these analyses.

### ◆ Risk Assessment

A hybrid approach is used in the evaluation process that allows for comprehensive risk analysis by United Group and its Operating Companies. From the perspective of Nova, the hybrid approach ensures that local management actively

contributes to the evaluation process by assessing risks that may affect their specific operations. Nova evaluates the likelihood and impact of identified risks based on its local environment, business model, and operational realities. These evaluations are then consolidated at Group level to ensure consistency and comparability across entities.

This process allows Nova to provide valuable operational insight while aligning their assessments with Group-wide methodologies and strategic priorities, ultimately ensuring that both local and Group perspectives are reflected in the overall risk profile.

#### ◆ Risk Response

Continuing from the previous phase, risks are then ranked and prioritized according to their financial, operational, reputational, market, and other relevant impacts, in order to develop the appropriate mitigation strategies that are then embedded into business planning. To this end, mitigation plans include structured timelines, accountable roles with relevant responsibilities assigned, and regular updates, all reported through risk management tools.

#### ◆ Monitoring and Reporting

Risk mitigation and opportunity realization activities are carried out under the responsibility of assigned risk owners, who oversee both execution and assessment. Progress is tracked through established monitoring tools that evaluate the effectiveness of each response. The Executive Director of Compliance, Risk & Sustainability reports environmental risks and opportunities to the Board of Directors quarterly.

#### ◆ Cybersecurity

Nova recognizes cybersecurity as a critical enabler of not only trust and business continuity, but also operational resilience in an increasingly interconnected digital environment. As cyber threats continue to evolve in both complexity and scale, Nova remains committed to maintaining a robust cybersecurity posture that safeguards the confidentiality, integrity, and availability of its systems, data, and services.

#### ◆ Embedding Security by Design

The Company's cybersecurity action plan is built on a "security-by-design" approach, ensuring that protective measures are integrated throughout the

technology lifecycle—from system development and procurement to operations and incident response.

#### ◆ Regulatory Alignment and Frameworks

Nova adheres to all applicable national and EU-level cybersecurity requirements, including the General Data Protection Regulation (GDPR) and sectoral obligations. As part of its regulatory preparedness, Nova is actively preparing for an enterprise-wide readiness assessment aligned with the upcoming NIS2 Directive, ensuring timely adaptation to new supervisory, risk management, and incident reporting requirements. The Company operates an Information Security Management System (ISMS) certified under ISO 27001 and ISO 22301 for business continuity, complemented by the certification in ISO 9001 for quality management.

#### ◆ Threat Monitoring, Testing, and Controls

Nova proactively tests and strengthens its cybersecurity defenses through regular internal risk assessments, vulnerability scans, and penetration testing. Indicative controls implemented include network segmentation,

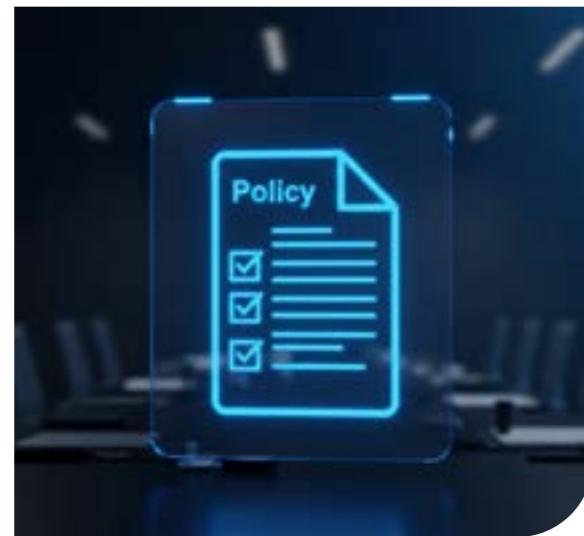
multi-factor authentication, web filtering, and advanced detection systems. The cybersecurity team works closely with the data privacy function and compliance department to maintain layered defense mechanisms and ensure alignment with internal policies and regulatory obligations.

#### ◆ Incident Management and Response

Nova maintains clearly defined protocols for identifying, reporting, and responding to cybersecurity incidents, while its incident response process is supported by cross-functional collaboration and automated escalation mechanisms. Lessons learned from incidents are used to strengthen future response capabilities and refine preventive controls.

#### ◆ Employee Cyber Awareness

Recognizing that people are a critical line of defense, Nova invests in continuous cybersecurity awareness training, including targeted campaigns on phishing, secure data handling, and privacy practices. New employees receive security onboarding as part of their initial training, while refresher modules are delivered periodically across all business functions.



## Strong Compliance and Ethics

At Nova we are deeply committed to conducting business responsibly and sustainably. Integrity defines how we operate, from our daily decisions to our long-term strategy. Our values shape every action we take and guide us to meet the expectations of our stakeholders with transparency and accountability. Ethical conduct is not just a principle at Nova. It is the core of our culture and the foundation of our governance practices.

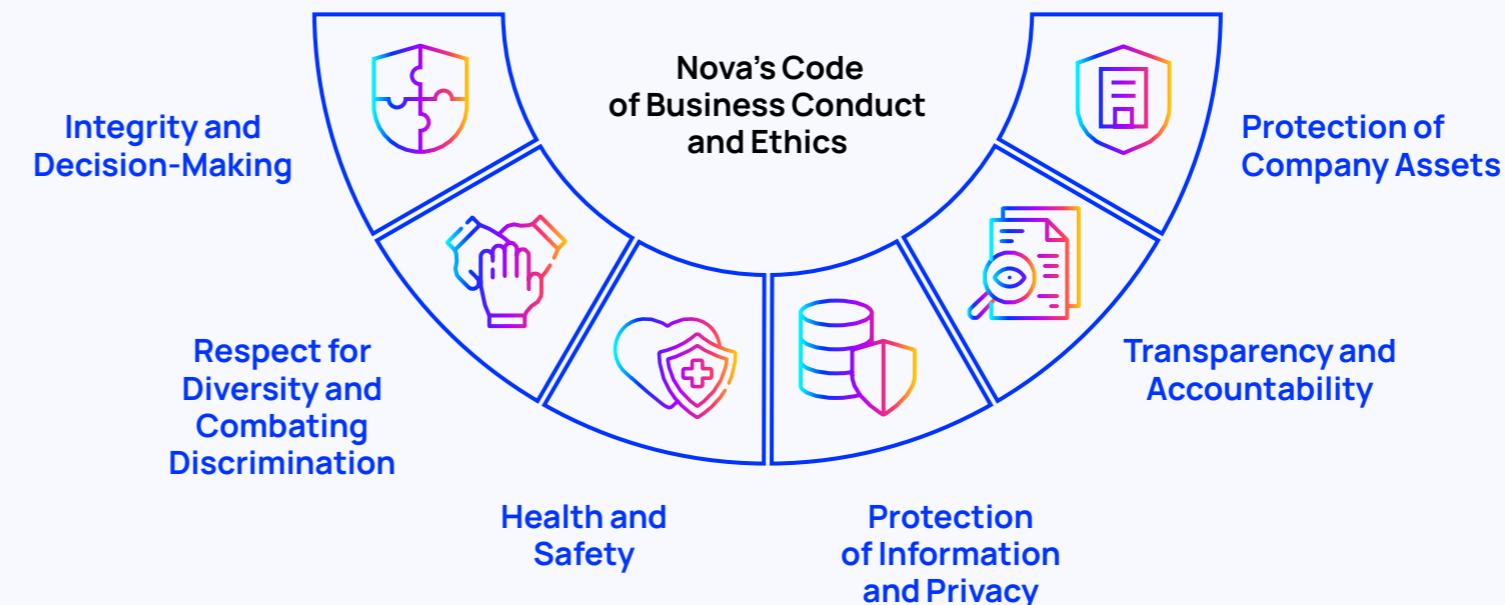


### 1. Nova's Code of Business Conduct and Ethics

Nova's Code of Business Conduct and Ethics serves as the cornerstone of our corporate values, outlining the principles that guide the behavior of employees, executives and partners. It embodies Nova's commitment to integrity, fairness and accountability and emphasizes the importance of

ethical decision-making, even in complex or high-pressure situations. Beyond defying expectations, the Code provides a practical framework for identifying and managing conflicts of interest, protecting confidential information and ensuring regulatory compliance. Built around six core pillars,

the Code reaffirms Nova's dedication to the highest ethical standards, complying with applicable laws and regulatory requirements. We also extend these standards to our suppliers through our Supplier Code of Conduct, reinforcing our broader commitment to integrity and sustainability.





### Integrity and Decision-Making

Nova expects all employees and executives to make decisions guided by the highest standards of ethics and integrity, free from personal interests and aligned with the Company's and stakeholders' best interests. The Code promotes transparent, policy-aligned decision-making and highlights the importance of ethical judgment in challenging situations. When in doubt, employees are encouraged to seek guidance from their supervisors or compliance officers.



### Respect for Diversity and Combating Discrimination

Nova fosters a work environment rooted in diversity, equality, and inclusion, ensuring all employees are treated with respect and dignity, regardless of gender, ethnicity, religion, sexual orientation, or other personal characteristics. Harassment, discrimination, or bullying are strictly prohibited and addressed through clear policies and disciplinary action.



### Health and Safety

Nova promotes a safe and healthy working environment by complying with occupational safety standards, delivering targeted training, and proactively addressing hazards. Employees are encouraged to report unsafe conditions without fear of reprisal. Additionally, open channels for reporting any omissions or incidents related to safety in the workplace are maintained by the Company, ensuring that all necessary measures are taken to protect staff.



### Protection of Information and Privacy

Ensuring confidentiality and protecting personal data is one of Nova's core commitments. The Code specifies the strict adherence to rules governing the protection of personal data and the privacy of both customers and employees. Robust technical and organizational measures are set in place to prevent unauthorized access, loss, or misuse, with employees expected to handle all data respectfully and in full compliance with applicable regulations.



### Transparency and Accountability

Nova upholds transparency and promotes accountability across all levels, with the Code of Conduct establishing clear procedures for reporting and investigating violations. Confidential reporting channels are available to employees, with protections against retaliation and a commitment to handle reports seriously, confidentially, and promptly, while taking any necessary corrective action.



### Protection of Company Assets

Nova safeguards its physical and intangible assets, such as facilities, products, and technological infrastructure, by enforcing rules for their responsible use, ensuring they are utilized solely for legitimate and business-related purposes.



## 2. Integrity Helpline

Nova maintains a strong commitment to ethical conduct and organizational transparency through the implementation of a secure and confidential Integrity Helpline, available to both internal and external stakeholders. The helpline is a central component of Nova's compliance ecosystem and operates under the broader United Group framework.

The Integrity Helpline is hosted by an independent third-party provider and is accessible 24/7 through multiple channels – phone, web and mobile platforms. It supports reports in any language, encouraging employees, contractors, partners and third-party stakeholders from diverse backgrounds to speak up without fear.

Importantly, the Integrity Helpline ensures full confidentiality and the option to remain anonymous. Reporters can choose to submit their concerns anonymously and Nova takes all necessary measures to protect their identity. Where legal requirements may affect anonymity, Nova transparently informs the reporter and ensures that appropriate protective measures are in place.

The platform also fully complies with the EU Whistleblower Protection Directive, meeting the criteria for internal whistleblowing mechanisms. Each report receives a unique case code, allowing reporters to securely provide additional information or engage in a confidential, anonymous dialogue

with Nova's Compliance Team. This process ensures that all concerns are thoroughly reviewed and addressed in a fair and timely manner.

Suppliers are made aware of the Integrity Helpline through the Supplier Code of Conduct, where all relevant details are provided. This information is actively communicated and made easily accessible across the entire supply chain.

To guarantee maximum visibility and accessibility, Integrity Helpline information is also published on Nova's official website, ensuring that any stakeholder, at any level, can easily access this important resource and report concerns or grievances.

In addition to the Integrity Helpline, Nova offers further support through its dedicated Compliance Team, reachable at [compliance@united.group](mailto:compliance@united.group). For any questions or clarifications regarding policies, procedures or specific concerns, the Compliance Team is available to provide guidance and support, ensuring clarity and adherence to our ethical standards.

Nova encourages everyone, both inside and outside the organization, to come forward with any concerns about wrongdoing, human rights violations, or other grievances. We are committed to ensuring that all individuals feel safe, supported and protected when raising their voices.



## Scope of Reportable Violations

Nova encourages reporting of any conduct that may violate legal standards, internal policies, or ethical norms. The categories of potential violations include:

◆ **Financial Misconduct:**

Fraud, embezzlement, money laundering, tax evasion, and accounting irregularities.

◆ **Corruption and Bribery:**

Acceptance or offering of bribes, conflicts of interest, or unethical business practices.

◆ **Workplace Issues:**

Harassment, discrimination, human rights

violations, and retaliation against whistleblowers.

◆ **Environmental and Safety Concerns:**

Non-compliance with environmental regulations or unsafe working conditions.

Nova's **Whistleblower & Anti-Retaliation Policy** outlines how to report concerns, how those reports are handled and escalated, and the protections in place for individuals who come forward. The company is committed to maintaining a safe environment to protect individuals who report concerns in good faith. Reporters are guaranteed that raising a concern will not result in adverse

consequences, such as demotion, dismissal, or harassment. This assurance plays a crucial role in fostering an open, transparent workplace culture.

Once a report is received, Compliance function conducts a thorough investigation following standardized procedures as set out in **our Investigation Action Protocol**. Complementing the Whistleblower Policy, this Protocol governs how Nova investigates reported breaches of conduct or compliance. It describes investigation roles, timelines, evidence handling procedures, and reporting obligations. Protocol ensures that

investigations are conducted fairly, efficiently, and consistently, while respecting the rights of all parties involved. It plays a critical role in preserving organizational accountability and trust in Nova's ethical systems.

In 2024, we received 19 complaints related to compliance matters through our various reporting channels. All complaints were promptly addressed and thoroughly investigated by our Compliance team. Importantly, none of the complaints resulted in the identification of serious legal issues that required disclosure to the competent authorities.



## 3. Anti-Bribery & Corruption Program

Our **Anti-Bribery & Corruption Policy** promotes a culture of vigilance, recognizing that bribery takes various forms beyond payments, including gifts, entertainment, travel, donations, sponsorships, or any benefit, direct or indirect. For this reason, we have implemented an electronic platform to seek compliance approvals for activities carrying a bribery risk, including gifts, entertainment, travel, donations, and sponsorships (the "GET Register"). The GET Register offers an efficient and user-friendly

experience for our employees, ensuring that compliance procedures are followed seamlessly. The electronic questionnaires associated with the GET Register can be completed in less than five minutes, significantly reducing the time and effort required from our staff. This assessment ensures that all aspects of potential risks are thoroughly examined. The evaluation considers various factors, including the market value of gifts, entertainment expenses, sponsorships, and overall expenditures with recipients

or offerors. Additionally, the questionnaire considers existing or upcoming contracts or tenders that may impact compliance with anti-corruption regulations. By incorporating a robust and thorough assessment process, the GET Register questionnaire effectively identifies and evaluates potential compliance risks.

This approach enables Nova to proactively address any red flags or areas of concern, mitigating the potential for unethical or

non-compliant activities. In 2024, the Compliance team processed 170 requests of approval regarding gifts, entertainment, donations, and sponsorships via the GET Register.

As part of our commitment to maintaining high ethical standards, 1,186 employees—representing 99% of those eligible for ABC training completed our ad hoc anti-bribery and corruption training in 2024, delivered as part of a dedicated anti-corruption campaign.



## 4. Conflict of Interest Management

At Nova, we maintain a strong commitment to integrity by ensuring that personal interests never compromise professional judgment or company values. Our Conflict of Interest Policy provides clear guidance for identifying, disclosing, and managing any situations that could create real or perceived conflicts. Employees are required to report potential conflicts through an online declaration system, which ensures transparency and prompt review by compliance officers. Decision-makers and other high-risk roles must also submit an annual declaration, even when no conflicts exist, reinforcing individual accountability and ethical awareness. In 2024, over 189 disclosures were recorded across the organization, including 158 annual declarations from decision-makers. Nova further strengthens this process by encouraging proactive disclosure of any external relationships or activities that could influence objectivity, and by implementing safeguards—such as recusal from decision-making—to prevent undue influence. Through these measures, we uphold fairness, trust, and integrity in every aspect of our business operations.



## 5. Integrity across Third Party Relationships

At Nova, we uphold the highest standards of ethics and integrity across all business relationships. Our **Due Diligence on Third-Party Relationships Policy & International Sanctions Policy** ensure that bribery, corruption, and sanctions risks are identified and mitigated both before engagement and throughout ongoing partnerships. The Procurement Team conducts continuous screening of new and existing third parties against sanctions lists, PEP databases, and global media, with alerts triggered for any compliance concerns. In 2024, we screened **152 entities**, reinforcing our commitment to transparency and accountability.

As part of this framework, Nova promotes ethical conduct and sustainability through its **Supplier and Partner Code of Conduct**, which outlines expectations for integrity, human rights, environmental responsibility, and fair labor practices. Aligned with international standards such as the RBA Code of Conduct and UN Guiding

Principles on Business and Human Rights, the Code ensures that all partners share our values of responsible and compliant business conduct.

Suppliers are expected to uphold Nova's core values and extend these expectations within their own operations and supply chains.

Further to the above, Nova requires partners to affirm acceptance of the Code of Conduct and policies during the onboarding and the contract renewal process. Tailored contractual clauses are embedded across procurement and service agreements, enabling enforcement, audits, and termination for violations.

### Supplier Onboarding Process

Nova utilizes an online registration platform where suppliers are required to submit all relevant documentation demonstrating their capability to undertake projects. The registration process includes:

- ◆ NDA
- ◆ General Supplier Terms
- ◆ Code of Conduct Compliance
- ◆ Certifications (where applicable)
- ◆ Cybersecurity Questionnaire
- ◆ Financial Data
- ◆ Representation Certificates
- ◆ International Sanctions Screening

### Supplier Evaluation Process

Nova's supplier evaluation program is conducted annually by the Supply Chain team, in collaboration with the Business Owner and the Credit Risk & Collections department. This applies to the top 20 suppliers (based on cost) per procurement category or critical vendors. The evaluation includes:

- ◆ Performance Assessment by the Business Owner
- ◆ Commercial and Financial Review by the Supply Chain team





## Certified Management Systems

Nova is committed to operational excellence and regulatory compliance through a robust framework of internationally certified management systems. These systems ensure that its operations are aligned with the highest standards in quality, environment, safety, energy, cybersecurity, and business resilience. Additionally, there are on-going efforts to align with NIS2 requirements and implement the ISO 37001 Anti-Bribery Management System are underway and expected to be completed by 2025.

### Quality Management (ISO 9001)

An ISO 9001-certified quality management system is implemented and covers the full lifecycle of telecommunications services and IT infrastructure—from design and development to delivery and after-sales support. Its scope includes the design, development, implementation, operation, support and maintenance of telecommunications and information systems infrastructure, telecommunications and data networks, information systems and applications, as well as the design, development, monitoring, control and support of the store chain. Specifically includes:

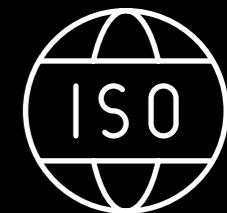
- ◆ Design, Development, Provision, Sales, Billing and Support of Integrated Telecommunication Products and Services (Wireless, Fixed, Data, Internet, Broadband and Pay TV over broadband networks) for Consumer and Business Customer
- ◆ Design, Development, Realization, Operation, Support and Maintenance of Telecom, Pay TV and IT infrastructure, Telecommunications and Data networks, Information Technology Applications and Systems
- ◆ Design, Development, Monitor, Control and Support of Nova stores Network.

- ◆ Sale of Mobile, Fixed and Internet Telecommunication Services and Pay TV.
- ◆ Retail Sale of Mobile and Fixed Terminals, Electronic Consumer Product and Accessories.
- ◆ Service of Mobile Terminals.
- ◆ After Sales Support of Consumers and Business Customers.

### Health & Safety Management (ISO 45001)

Employee well-being remains a cornerstone of Nova's operations. The ISO 45001 certification ensures a proactive approach to occupational health and safety across all business functions, including infrastructure maintenance, store operations, and customer service. Its scope includes the design, development, provision, sale and support of integrated telecommunications products and services (Mobile and Fixed Telephony, Data, Internet, Broadband and Pay TV over broadband networks) for Consumer and Business customers; the design, development, implementation, operation, support and maintenance of Telecom, Pay TV and Information Systems infrastructure, Telecommunications and Data networks, Information Technology applications and systems;

## Certifications



- ✓ ISO 9001 - Quality Management
- ✓ ISO 45001 - Health & Safety Management
- ✓ ISO 14001 - Environmental Management
- ✓ ISO 50001 - Energy Management
- ✓ ISO 22301 - Business Continuity Management
- ✓ ISO 27001 - Information Security Management

### Environmental (ISO 14001)

Nova's environmental management system, that in accordance with the international standard ISO 14001, ensures responsible practices across our entire value chain—from telecommunications service design to retail operations. The scope of the ISO 14001 certified system covers the design, development, provision, sale, billing and support of integrated telecommunications products and services (Mobile and Fixed Telephony, Data, Internet Broadband and Pay TV over broadband networks) for consumer and business customers; the design, development, implementation, operation, support and maintenance of Telecom, Pay TV and Information Systems infrastructure, Telecommunications and data networks, Information Technology applications and systems; and the design, development, monitoring, control and support of the store chain. While the implementation of the system in stores includes the sale of mobile and fixed telephony, internet services and Pay TV (Mobile, Q Prepaid, Fixed Telephony, Internet and Pay TV); the retail sale of mobile and fixed telephony devices, electronic equipment and accessories; the repair of mobile telephony devices; and the after sales service for consumer and business customers.

### Energy Management (ISO 50001)

Nova implements an ISO 50001-certified energy management system in our energy-intensive facilities, targeting the efficient operation of Data Centers, Switching nodes, and corporate offices. The scope of the ISO 50001 certified system covers the operation of administration offices as well as the operation of Data Centers and Switching Centers of Telecommunications (Mobile & Fixed) and Pay TV Services.

### Business Continuity Management (ISO 22301)

Recognizing the need to ensure service availability under all circumstances, Nova maintains ISO 22301 certification for -Societal security - Business Continuity Management System- since 2017. Nova has mapped critical business functions, assessed operational risks, and developed comprehensive continuity and crisis communication plans. Therefore, the Company can continue all its critical operations and provide uninterrupted critical services to customers in the event of an incident that could negatively affect important business units, systems and services. The Business Continuity Management system that has been established to define and prioritize the Company's critical functions, activities, infrastructure, and services, along with the necessary resources that can be mobilized when required. Operational risks have been identified and assessed, with appropriate measures implemented to mitigate potential impacts on Nova's day-to-day operations. In parallel, Business Continuity, Crisis Management, and Communication Plans are continuously developed, implemented, tested, maintained, and monitored to strengthen organizational resilience.

### Information Security Management (ISO 27001)

Information security is deeply embedded in Nova's culture. The ISO 27001 certification validates its commitment to safeguarding data, maintaining confidentiality, integrity, and availability of information. This certification reinforces Nova's commitment to safeguard customer data, network integrity, and operational continuity across all business units. Through a structured Information Security Management System (ISMS), Nova identified critical assets, assessed

potential threats, and established robust controls to ensure the confidentiality, integrity, and availability of information.

By embedding the ISMS to our day to day operations, we have enhanced our resilience to emerging digital threats, ensuring that data privacy and security standards are consistently maintained across our telecom infrastructure and partner ecosystem. This approach reinforces stakeholder trust and promotes sustainable digital growth, fully aligned with international best practices and regulatory requirements.

### Cybersecurity Training and Awareness

Recognizing that human error remains one of the most significant vulnerabilities in information security, Nova places strong emphasis on the continuous training of all employees. Even the most advanced technological solutions cannot effectively mitigate cyber risks unless employees are well-informed and proactive in identifying threats and practicing responsible behavior. As part of the Group's ongoing commitment to strengthening its security posture, dedicated awareness training programs are going to be rolled out in Q4 of 2025, focusing on:

- ◆ Key legal and regulatory requirements related to data protection and cybersecurity,
- ◆ Internal security frameworks, roles, and governance structures,
- ◆ Employee responsibilities and cybersecurity best practices,
- ◆ Awareness around phishing, social engineering, safe email usage, strong password hygiene, and secure digital behavior.

# Appendices

05

# About the Report

## Scope of the Report

The Sustainability Report of Nova, including Nova Telecommunication & Media Single Member S.A., Nova ICT, and United Fiber, referred to in this Report as "Nova" or the "Company" is a non-financial reporting and covers the period 1/1/2024 to 31/12/2024 and includes data for the year 2023 for comparative purposes. This Report aims to directly inform the Company's stakeholders on ESG and sustainability issues, summarizing its performance for 2024 in these areas.

Through this Report, the Company describes how it responds comprehensively to contemporary economic, environmental, and social challenges, while contributing to its Sustainable Development and corporate responsibility. The qualitative and quantitative information presented in the Report covers all of Nova's operations in Greece.

## Methodology

This Report was prepared with reference to GRI Standards 2021. The principles of GRI were also

applied for the definition of content regarding the completeness of the information presented, the materiality of issues, the response to stakeholder's' needs, and the overall framework of the organization's Sustainable Development performance, as well as all the principles for its quality.

In addition, the preparation of this Report has been guided by the AA1000 Accountability Principles Standard (AA1000AP, 2018), applying the principles of Inclusivity, Materiality, Responsiveness and Impact to Nova's stakeholder engagement, materiality analysis and disclosure of impacts.

The Materiality Assessment was conducted based on the internationally recognized GRI Standards and the industry standard Sustainability Accounting Standards Board (SASB), in order to identify the Company's most material issues. Stakeholder input was also taken into account through a specialized engagement exercise, as well as the 17 Sustainable Development Goals

(SDGs) of the United Nations and the indices of the Athens Stock Exchange's ESG Reporting Guide.

## Project Team

A Sustainable Development Unit has been set up to prepare this report and effectively manage related issues, including the collection of relevant information and data.

The preparation of the report was supported and scientifically managed (data collection, assessment and preparation) by Grant Thornton. ([www.grant-thornton.gr](http://www.grant-thornton.gr)).



Grant Thornton

## Sources of information

The information and data presented in this Report have been collected by the Company on the basis of internal recording procedures and databases maintained as part of the implementation of the relevant management systems. Where

data is presented after processing or based on assumptions, the nature or method of calculation is indicated in accordance with the GRI Standards guidelines.

## AA1000 External assurance

The Report is subject to external assurance by an independent body, specifically TÜV NORD HELLAS S.A., to verify its alignment with the AA1000AP (2018) principles, as assured in accordance with AA1000AS v3 methodology.

The main focus of the assurance engagement is to evaluate Nova's adherence to the AA1000 Accountability Principles – Materiality, Inclusivity, Responsiveness and Impact – as defined in AA1000AP (2018). In addition, the assurance project may include the verification of specific, mutually agreed sustainability indicators and related claims included in this Report. The scope, criteria and conclusions of the external assurance will be presented in the Independent Assurance Statement on page 90 of the Report.

## AA1000 Accountability Principles Application Statement

Application of the AA1000 Accountability Principles (AA1000AP, 2018).

In preparing this 2024 Sustainability Report, Nova applied the four Accountability Principles of the AA1000AP (2018), which guide the Company's approach to sustainability management and reporting:

**Inclusivity:** Nova identifies and engages its key stakeholder groups—including employees, customers, suppliers, local communities, regulatory bodies and shareholders—to understand their expectations and ensure that their perspectives contribute to decision-making and priority-setting.

**Materiality:** The Company conducts a structured materiality assessment, using the GRI Standards and SASB Telecommunications framework, combined with stakeholder input, peer benchmarking and strategic priorities, to determine the sustainability topics that reflect Nova's most significant impacts.

**Responsiveness:** Nova integrates stakeholder feedback and materiality outcomes into its ESG

goals, actions and disclosures. The Company's initiatives, performance indicators and management approaches presented in this Report demonstrate how Nova responds to its material issues.

**Impact:** The Report provides information on the Company's key economic, environmental and social impacts, and describes how Nova contributes to broader national and global sustainability objectives, including the UN Sustainable Development Goals (SDGs).

The above principles also form the basis for the external independent assurance of this Report, conducted in accordance with AA1000ASv3.

### Limitations

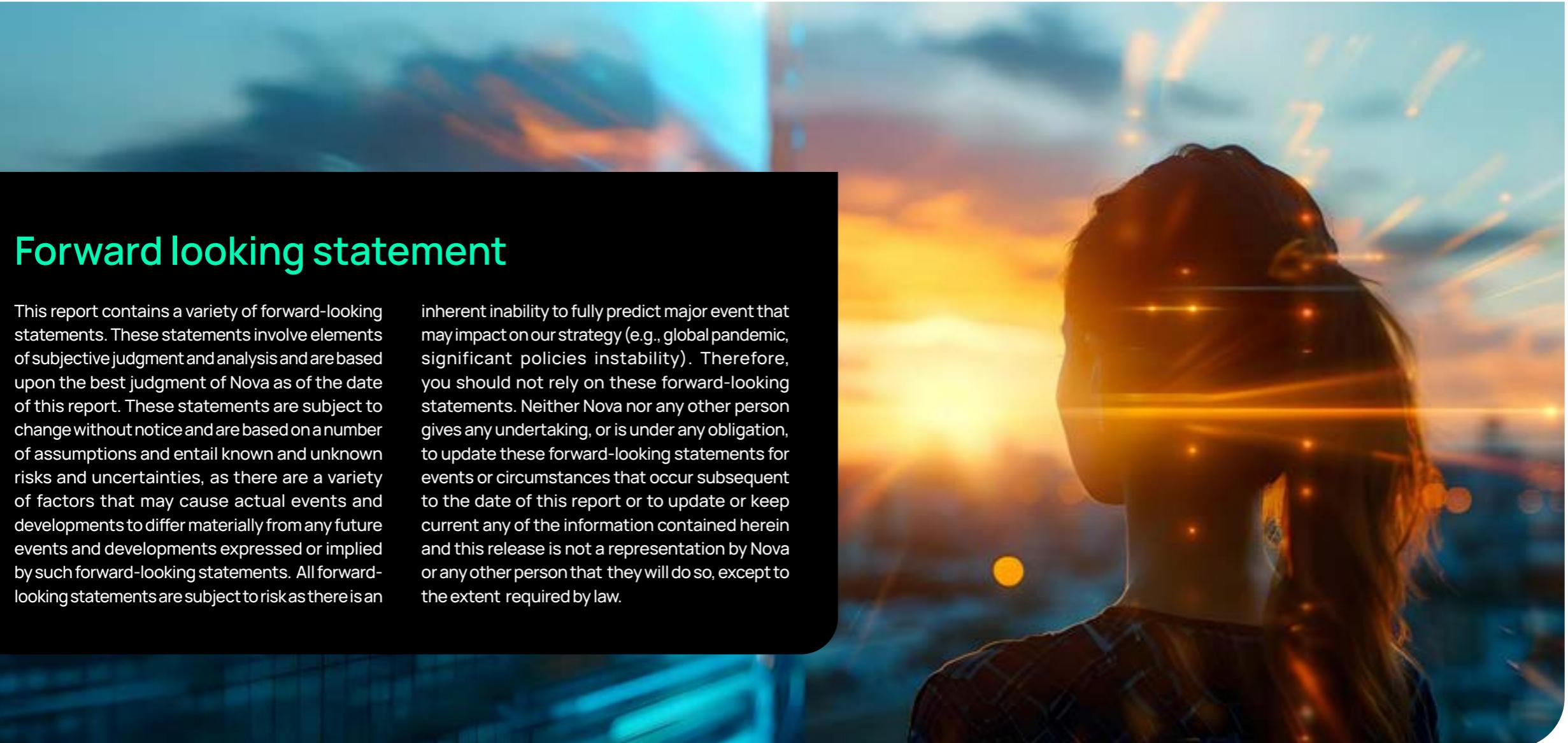
There is no limitation on the scope or limits of the Report that would affect the year-on-year comparison of information.

### Contact

Please submit your comments and observations on the Report or fill in the attached contact format at the end of the Report and send it to the following address:

[sustainability@nova.gr](mailto:sustainability@nova.gr)





## Forward looking statement

This report contains a variety of forward-looking statements. These statements involve elements of subjective judgment and analysis and are based upon the best judgment of Nova as of the date of this report. These statements are subject to change without notice and are based on a number of assumptions and entail known and unknown risks and uncertainties, as there are a variety of factors that may cause actual events and developments to differ materially from any future events and developments expressed or implied by such forward-looking statements. All forward-looking statements are subject to risk as there is an

inherent inability to fully predict major event that may impact on our strategy (e.g., global pandemic, significant policies instability). Therefore, you should not rely on these forward-looking statements. Neither Nova nor any other person gives any undertaking, or is under any obligation, to update these forward-looking statements for events or circumstances that occur subsequent to the date of this report or to update or keep current any of the information contained herein and this release is not a representation by Nova or any other person that they will do so, except to the extent required by law.

# Communication with Stakeholders

 Stakeholders	 Contact Channels / Modes of Communication	 Key Issues of Interest	 Stakeholders	 Contact Channels / Modes of Communication	 Key Issues of Interest
<b>Shareholders &amp; Investors</b>  <b>Frequency of communication:</b> <i>Monthly and whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Information through the media</li> <li>◆ Electronic communication</li> <li>◆ Telephone communication</li> <li>◆ Website info</li> <li>◆ Face-to-face communication</li> </ul>	<ul style="list-style-type: none"> <li>◆ Corporate actions</li> <li>◆ General meetings</li> <li>◆ Major shareholder obligations</li> <li>◆ Dividends</li> <li>◆ Composition</li> </ul>	<b>Suppliers</b>  <b>Frequency of communication:</b> <i>Daily</i>	<ul style="list-style-type: none"> <li>◆ Telephone communication</li> <li>◆ Emails</li> <li>◆ Interpersonal communication</li> <li>◆ One to one meetings</li> </ul>	<ul style="list-style-type: none"> <li>◆ Seamless operation</li> <li>◆ Regular operation</li> <li>◆ Reliability in transactions</li> </ul>
<b>The Company's response:</b>					
<b>Employees</b>  <b>Frequency of communication:</b> <i>Daily</i>	<ul style="list-style-type: none"> <li>◆ Interpersonal communication</li> <li>◆ Electronic communication</li> <li>◆ Continuous education and training</li> <li>◆ Townhalls</li> <li>◆ Management meetings</li> <li>◆ Team events</li> <li>◆ Voluntarism events</li> <li>◆ Family days</li> </ul>	<ul style="list-style-type: none"> <li>◆ Excellent working conditions</li> <li>◆ Safe work</li> <li>◆ Well paid work</li> <li>◆ Management communication</li> <li>◆ Lifelong training</li> </ul>	<b>NGOs</b>  <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Company website</li> <li>◆ Corporate Affairs Division</li> <li>◆ Sustainable Development Report</li> <li>◆ Participation in Fora and Conferences</li> <li>◆ One to one meetings</li> </ul>	<ul style="list-style-type: none"> <li>◆ Support NGO's objectives</li> <li>◆ Financial support</li> <li>◆ Public awareness raising</li> </ul>
<b>The Company's response:</b>					
<b>Employees</b>  <b>Frequency of communication:</b> <i>Daily</i>	<ul style="list-style-type: none"> <li>◆ Sustainability Report</li> <li>◆ Implementation of relevant policies and procedures</li> <li>◆ Signed the Diversity Charter Greece</li> <li>◆ Employee satisfaction survey</li> <li>◆ Internal communication channels with Management</li> </ul>		<b>NGOs</b>  <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Family Day at "ARCHELON"</li> <li>◆ Donations</li> <li>◆ Access to the 1069 helpline via Nova telecommunications</li> <li>◆ Projects with social impact</li> <li>◆ Sustainability Report</li> </ul>	
<b>The Company's response:</b>					

 Stakeholders	 Contact Channels / Modes of Communication	 Key Issues of Interest	 Stakeholders	 Contact Channels / Modes of Communication	 Key Issues of Interest				
<b>Local Government</b> <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Telephone communication</li> <li>◆ Electronic messages</li> <li>◆ Live communication</li> <li>◆ Regular &amp; ad hoc (open door policy, meetings, events)</li> <li>◆ Visits to Mayors and Governors on issues of local concerns</li> </ul>	<ul style="list-style-type: none"> <li>◆ Legal compliance</li> <li>◆ Repayment of social security and tax debts</li> <li>◆ Environmental protection</li> <li>◆ Human rights</li> </ul>	<b>Customers (Businesses)</b> <b>Frequency of communication:</b> <i>Daily</i>	<ul style="list-style-type: none"> <li>◆ Electronic communication</li> <li>◆ Telephone communication</li> <li>◆ Information via web page</li> <li>◆ One to one meetings</li> <li>◆ Corporate Customers B2B events</li> </ul>	<ul style="list-style-type: none"> <li>◆ Immediate and secure service provision</li> <li>◆ Competitive cost products</li> <li>◆ Quality products and services</li> </ul>				
<b>The Company's response:</b> <ul style="list-style-type: none"> <li>◆ Sustainability Report</li> <li>◆ Implementation of relevant policies and procedures</li> <li>◆ Compliance with the law</li> <li>◆ Information on tech-related requests, providing scientific response and relevant studies</li> </ul>					<b>The Company's response:</b> <ul style="list-style-type: none"> <li>◆ Sustainability Report</li> <li>◆ Innovative Products &amp; Services</li> <li>◆ Customer Satisfaction</li> <li>◆ NPS</li> </ul>				
<b>Customers (individuals)</b> <b>Frequency of communication:</b> <i>Daily</i>	<ul style="list-style-type: none"> <li>◆ Website information</li> <li>◆ Branch experience</li> <li>◆ Call Center</li> </ul>	<ul style="list-style-type: none"> <li>◆ Quality services</li> <li>◆ Products/services at competitive prices</li> </ul>	<b>Policymakers / Regulatory Authorities</b> <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Regular and ad hoc communication (questionnaires, meetings, participation in consultations)</li> <li>◆ Presentations</li> <li>◆ Participation in Ministerial work force teams on industry-related issues</li> </ul>	<ul style="list-style-type: none"> <li>◆ Defining Substantive Sustainable Development Issues</li> <li>◆ Compliance and updating of legislation</li> </ul>				
<b>The Company's response:</b> <ul style="list-style-type: none"> <li>◆ Sustainability Report</li> <li>◆ Innovative Products &amp; Services</li> <li>◆ Customer Satisfaction</li> <li>◆ NPS</li> </ul>					<b>The Company's response:</b> <ul style="list-style-type: none"> <li>◆ Sustainability Report</li> <li>◆ Implementation of relevant policies and procedures</li> <li>◆ Compliance with the law</li> </ul>				

 Stakeholders	 Contact Channels / Modes of Communication	 Key Issues of Interest	 Stakeholders	 Contact Channels / Modes of Communication	 Key Issues of Interest
<b>Media</b>  <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Press events</li> <li>◆ Press releases</li> <li>◆ Publications and press releases</li> <li>◆ Notes to editors</li> <li>◆ Regular meetings with media representatives</li> </ul>	<ul style="list-style-type: none"> <li>◆ Announcements</li> <li>◆ Mergers, acquisitions, investments</li> <li>◆ Community stories</li> <li>◆ R&amp;D</li> <li>◆ Accurate, timely information</li> </ul>	<b>Local Communities</b>  <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Information through the media</li> <li>◆ Website information</li> <li>◆ On-site visits and meetings with local stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>◆ Uninterrupted supply</li> <li>◆ Supply safety</li> <li>◆ Environmental Protection</li> </ul>
<b>The Company's response:</b> <ul style="list-style-type: none"><li>◆ In the context of proper information and responsible promotion of the Company and its products and services, Media relations are handled appropriately and professionally.</li></ul>	<b>The Company's response:</b> <ul style="list-style-type: none"><li>◆ CSR program aiming at environmental restoration and civil protection</li><li>◆ Donations</li><li>◆ Support of local suppliers</li><li>◆ Projects with social impact</li><li>◆ Sustainability Report</li></ul>				
<b>State / Government Agencies</b>  <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Consultation with State/ institutional authorities (national/ regional)</li> <li>◆ Conferences/events of sectoral or general business interest</li> <li>◆ Publications and articles</li> <li>◆ Establishment of collaborations (e.g. Ministry of Environment)</li> </ul>	<ul style="list-style-type: none"> <li>◆ Climate change, RES</li> <li>◆ Sustainable finance</li> <li>◆ Circular economy</li> <li>◆ Environmental/legal compliance</li> <li>◆ Health and safety</li> </ul>	<b>Commercial Network</b>  <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Electronic communication</li> <li>◆ Telephone communication</li> <li>◆ Website information</li> </ul>	<ul style="list-style-type: none"> <li>◆ Announcements</li> <li>◆ Mergers, acquisitions, investments</li> <li>◆ R&amp;D</li> <li>◆ Accurate and timely information</li> </ul>
<b>The Company's response:</b> <ul style="list-style-type: none"><li>◆ Sustainability Report</li><li>◆ Implementation of relevant policies and procedures</li><li>◆ Compliance with the law</li></ul>	<b>The Company's response:</b> <ul style="list-style-type: none"><li>◆ In the context of proper information and responsible promotion of the Company and its products and services, the Company maintains professional and effective relationships across its commercial network</li></ul>				

 Stakeholders	 Contact Channels / Modes of Communication	 Key Issues of Interest
<b>ESG Analysts - Rating Agencies</b>  <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Meetings with stakeholders</li> <li>◆ Correspondence</li> <li>◆ Corporate website</li> </ul>	<ul style="list-style-type: none"> <li>◆ Environmental protection</li> <li>◆ Implementation of social actions</li> <li>◆ Health and safety of employees</li> <li>◆ Implementation of corporate governance standards and principles ESG data</li> </ul>
<b>The Company's response:</b> <ul style="list-style-type: none"> <li>◆ Awards and Distinctions</li> <li>◆ Partnerships</li> <li>◆ Sustainability Report</li> </ul>		
<b>Academic Community</b>  <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Meetings with representatives of the academic community</li> <li>◆ Correspondence</li> <li>◆ Corporate website</li> <li>◆ Online conferences</li> <li>◆ Participation in academic initiatives</li> </ul>	<ul style="list-style-type: none"> <li>◆ Research and Development(R&amp;D)</li> <li>◆ Technology transfer</li> <li>◆ Education and training</li> <li>◆ Social responsibility</li> </ul>
<b>The Company's response:</b> <ul style="list-style-type: none"> <li>◆ Graduate Trainee Program</li> <li>◆ Carrer Days</li> <li>◆ Internships</li> <li>◆ Sustainability Report</li> </ul>		

 Stakeholders	 Contact Channels / Modes of Communication	 Key Issues of Interest
<b>Parents / Educators</b>  <b>Frequency of communication:</b> <i>Whenever necessary</i>	<ul style="list-style-type: none"> <li>◆ Emails</li> <li>◆ Telephone communications</li> <li>◆ Written instructions</li> <li>◆ Quality assurance policies</li> </ul>	<ul style="list-style-type: none"> <li>◆ Strategic organization</li> <li>◆ Effective management</li> <li>◆ Achievement of objectives</li> <li>◆ Proper operation</li> </ul>
<b>The Company's response:</b> <ul style="list-style-type: none"> <li>◆ Sustainability Report</li> <li>◆ Digital Education</li> </ul>		



# SASB Content Index

SASB		
ID	Metric	Reference
TC-TL-130a.1	Percentage of electric energy from grid	89%
TC-TL-130a.1	Percentage of energy from renewable sources	80%
TC-TL-220a.1	Data Privacy	pp. 69-71
TC-TL-220a.2	Customers whose information is used for secondary purposes	No customer information is used for secondary purposes.
TC-TL-220a.3	Legal proceedings associated with customer privacy	The decision 20/2023 of the CFCA has been issued which concerned a case of 2018.
TC-TL-220a.4	Law enforcement requests	The number is confidential and cannot be disclosed.
TC-TL-220a.4	Customers whose information was requested	The number is confidential and cannot be disclosed.
TC-TL-220a.4	Percentage resulting in disclosure	The number is confidential and cannot be disclosed.
TC-TL-230a.1	Data breaches	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.
TC-TL-230a.1	Percentage of data breaches that involve personally identifiable information (PII)	The number is confidential and cannot be made public
TC-TL-230a.1	Customers affected by data breaches	The company maintains the strictest policies to ensure the confidentiality, integrity and availability of the personal data of its customers and takes all necessary measures to ensure their protection and processing in terms of transparency and always in accordance with the requirements of the legislative framework. If we find that there is a data breach, we will inform the affected consumers and the competent authorities.

SASB		
ID	Metric	Reference
TC-TL-230a.2	Data security risks	pp. 69-71
TC-TL-440a.1	Percentage of recovered materials that were landfilled	N/A
TC-TL-520a.1	Legal proceedings associated with anti-competitive behavior regulations	In the period 2024 there was one inspection of anticompetitive behavior and there were no related losses.
TC-TL-520a.2	Download speed of owned and commercially associated 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 to: a) comply with the legal and regulatory framework, b) ensure the Sustainability Report 2024 – Nova 58 integrity and security of the network, c) maintain the integrity and security of the network.
TC-TL-520a.2	Download speed of non-associated 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 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	Net neutrality, paid peering, zero rating and 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.gr/etairia/etairiko-profil">https://nova.gr/etairia/etairiko-profil</a>
TC-TL-550a.2	Technology Disruptions	0 Major Incidents (Technical Faults)

# AA1000 Accountability Principle's content index

AA1000		
AA 1000 Principles	Location	Page
<a href="#">The Principle of Inclusivity</a>	4.2 Stakeholders – Stakeholders Engagement	pp. 19, 83-86
<a href="#">The Principle of Materiality</a>	4.1 Sustainability Priorities	p. 14
	4.3 Materiality Analysis	p. 15
<a href="#">The Principle of Responsiveness</a>	3.1 Group's Presentation	p. 5
	4.4 Sustainable Goals for Nova	pp. 17-18
	5.1 Our Environmental Approach	pp. 23-37
	6.1 Human Resources	pp. 39-45
	6.2 Diversity and Equal Opportunities	pp. 41-42
	6.5 Customer Experience (Quality of Service)	pp. 77-78
	6.5.5 Responsible Procurement	p. 76
	6.7 Contributing to Society	pp. 47-57
	7.3 Privacy Protection	pp. 69-70
	3.5 Value Chain	pp. 20-21
<a href="#">The Principle of Impact</a>	5.1 Our Environmental Approach	pp. 22-37
	6.1 Human Resources	pp. 39-45
	6.3 Health, safety and social benefits for employees	pp. 45-46
	6.5.4 Responsible Mobile Services	p. 7
	6.5.5 Responsible Procurement	p. 76
	6.7 Contributing to Society	pp. 47-57



# Independent External Assurance Report



To: Management of NOVA Telecommunications & Media Single Member S.A.

## 1. Scope of the External Assurance project of the Sustainability Report

The **NOVA Telecommunications & Media Single Member S.A.** company (hereinafter referred to as **NOVA**) has assigned **TÜV HELLAS (TÜV NORD) SA** (hereinafter referred to as **TÜV NORD HELLAS**) the limited external assurance of the Sustainable Development Report, which covers the period of 1/1/2024-31/12/2024.

The Report refers to the activities of **NOVA** in Greece, including NOVA Telecommunications & Media Single Member S.A., United Fiber and NOVAICT.

The scope of the project consists of the following: The external assurance of the information disclosed to confirm that the Sustainability Report of **NOVA** for 2024 adheres to the AA1000 Accountability Principles (Inclusivity, Materiality, Responsiveness & Impact) against the criteria stated into the guide AA1000 Accountability Principles 2018 [**AA1000AP (2018)**].

The limited external assurance as it is defined by the above project scope, refers to the Sustainability Report of **NOVA** for 2024 and it was conducted based on the corresponding correlation table of **AA1000AP (2018)** metrics stated by **NOVA**, to confirm that the Sustainability Report adheres to the requirements of **AA1000AP (2018)**.

## 2. Project Criteria

The external assurance was based on the evaluation of conformity with the requirements of the guide **AA1000AP (2018)**.

For the evaluation of conformity to the requirements of **AA1000AP (2018)**, the provisions of the guide **AA1000 Assurance Standard (AA1000AS v3)** were followed. More specifically, the Type 1 level of external assurance was followed. According to this, evidence of the use of relevant processes, systems and controls, and available performance information, were reviewed in order the assurance provider assess the extent of the organization's

adherence to all four AA1000 Accountability Principles and provide relevant findings and conclusions.

## 3. Project methodology

Based on the conformance criteria of paragraph 2 and to draw conclusions, the external assurance team of **TÜV NORD HELLAS** conducted the following (indicative and not restrictive) methodology:

- Reviewed the coverage of the requirements of the **AA1000AP (2018)** AccountAbility Principles (Inclusivity, Materiality, Responsiveness & Impact).
- Reviewed the procedures followed by **NOVA** to identify and determine the material issues to include them within the Sustainability Report.
- Reviewed the materiality analysis of Sustainable Development and the identification of **NOVA** business impact activity on the environment, society, and the economy, as well as the risks and opportunities that arise for the company itself.

• Interviews were conducted with selected executives of **NOVA** having operational role in Sustainability issues to understand the current state of sustainability development activities and progress achieved during the period under reference.

- Reviewed the **NOVA** consultation approach with their stakeholders through interviews with executives responsible for communication with the interested parties at company level and review of selected documents.

## 4. Review limitations

The range of the review was exclusively limited to the activities of **NOVA** company and more specifically the company's activities in Greece. No visits and interviews in stakeholders of **NOVA** have been conducted.

In case of any discrepancy in the translation between Greek and English version of the Sustainability Report, the English version shall prevail.

## 5. Responsibilities of the Reporting Organization and Assurance Provider

The Corporate Responsibility Division of **NOVA** carried out the Sustainability Report, thus, is exclusively responsible for the information and statements contained therein.

The external assurance conducted, as it is defined in the project scope (paragraph 1), does not represent **TÜVNORD HELLAS**' opinion related to the quality of the Sustainability Report and its contents.

The responsibility of **TÜVNORD HELLAS** is to express the independent conclusions on the issues as defined in the project scope and in accordance with the relevant contract. The project was conducted in such a way so that **TÜVNORD HELLAS** can quote to **NOVA** administration the issues mentioned in this report and for no other purpose.

## 6. Conclusions

Based on the project scope (paragraph 1) and in the context of the external assurance procedure followed by **TÜVNORD HELLAS**, the conclusions are as follows:

**External assurance of the information disclosed to confirm that the Sustainability Report of NOVA for 2024 adheres to the AA1000 AccountAbility Principles (Inclusivity, Materiality, Responsiveness & Impact) against the criteria found in AA1000AP (2018).**

For each Principle, **TÜV NORD HELLAS** seek information related to the following three lines of auditing:

- **Context**, on the current management thinking, priorities, and resources of the organization
- **Process**, on procedures, processes, and systems
- **Performance**, on how the management context and results affect the performance of the organization

For each of these auditing trails, **TÜVNORD HELLAS** collated evidence from **NOVA**, such as documents, files, software, or databases used to evidence adherence to each Principle. Depending on the boundary of assurance agreed upon, **TÜVNORD HELLAS** considered the multiple layers of **NOVA** as necessary to make its assessment

Our conclusions concerning the Adherence to the AA1000 AccountAbility Principles are as follows:

### Inclusivity: Dialogue on Sustainability Issues with the Stakeholders

- We have not realized any matter that causes us to believe that major stakeholder groups were excluded from consultation processes, or that **NOVA** has not implemented the principle of Inclusivity in developing its approach to sustainability.

**NOVA** has processes in place for identifying and engaging with a range of key stakeholders including investors, clients, employees, suppliers, and representatives from industry and sustainability associations as described in the Report. These engagement activities include Newsletters, site visits, audits, conferences, seminars, corporate memberships, face-to-face or online meetings, telephone/emails, information requests, employee satisfaction surveys, online idea collection platforms, internal communication events, announcements, townhall meetings, workshops and feedback forums etc. These

methods of engagement are embedded in how **NOVA** runs its business and delivers products and services to clients. **NOVA** has also implemented effective governance processes to engage business segment and functional leadership on sustainability issues, such as the CSR Governance Committee. **NOVA** provides additional details regarding these aspects of inclusivity in its 2024 Sustainability Report.

### Materiality: Focus on the material issues related to sustainability

- We have not realized any matter that causes us to believe that the material issues' definition approach which was followed by **NOVA** does not provide a comprehensive and balanced understanding of the material issues

**NOVA** conducts a materiality assessment, referred to as a Double Materiality Assessment (DMA), annually to identify risks and opportunities, shape **NOVA**'s business strategy, and define the material topics to disclose in its reporting. This included, but was not limited to, determining sustainability matters pertinent to the organization, analyzing

NOVA's upstream and downstream activities, reviewing business relationships/partnerships, and identifying actual and potential impacts, risks, and opportunities. The material topics and the assessment processes are described in the Report.

#### **Responsiveness: Addressing the needs and expectations of stakeholders**

- We have not realized any issue, which would lead us to believe that **NOVA** has not responded timely and adequately, through decisions and actions, to the needs and expectations that emerged from the material issues of sustainable development.

**NOVA** has demonstrated responsiveness to material issues during 2024 through organizing cross-functional, diverse teams and various other actions described in the 2024 Report. For example, **NOVA** has utilized feedback from employees through surveys and town hall meetings to continuously improve upon previous attempts to foster engagement and address areas of improvement for the organization. In 2024, **NOVA**

implemented action plans to support employees and provide resources in three key areas: learning, development and performance. **NOVA** refers to this initiative as Learning & Development and Performance Management. The company remains committed to investigating issues raised through established reporting channels and takes remedial measures as deemed appropriate for material topics including data privacy, occupational health and safety, greenhouse gas emissions, and more. The 2024 Sustainability Report discusses these and other responses by the company to its material issues.

#### **Impact: Impact of company's activities to the broader ecosystems**

- We have not realized any issue, which would lead us to believe that the **NOVA** has not understood and managed the direct and indirect impacts that the material aspects create to the broader ecosystems.

**NOVA** has established processes to measure, evaluate and manage the company's impacts related to material topics and other sustainability

issues. To organize information and drive additional impact, **NOVA** maps topics relevant to their business to the United Nations Sustainable Development Goals (SDGs). The 2024 Sustainability Report provides additional information regarding **NOVA**'s commitment to measuring and managing its impacts related to its material issues.

**TÜV NORD HELLAS** did not realize anything that would lead to the conclusion of incorrect collection or transfer of data concerning the allegations made regarding the fulfillment of the requirements of the Accountability Principles, as set out in **AA1000AP (2018)**.

During the assurance, no issues arose that would lead to improvement proposals.

#### **7. Impartiality and independence of the external assurance team**

**TÜV NORD HELLAS** states its impartiality and independence in relation to the project of **NOVA** Sustainability Report external assurance. **TÜV NORD HELLAS** has not undertaken work with **NOVA** and does not have any cooperation with

the interested parties that could compromise the independence or impartiality of the findings, conclusions, or recommendations.

**TÜV NORD HELLAS** was not involved in the preparation of the text and data presented in the Sustainability Report of **NOVA**.

Athens, December 4, 2025

For **TÜV NORD HELLAS**



**Nestor Paparopoulos**  
Product Manager



# GRI Content Index of Nova

<b>GRI 1: Foundation statement of use</b>	The information provided in this Report reflects the activities of Nova as of 31 December 2024 and presents the Company's economic, environmental and social performance. The Report is prepared in accordance with the Global Reporting Initiative (GRI) Standards 2021.
<b>GRI 1 used</b>	GRI 1: Foundation 2021
<b>Applicable GRI Sector Standard(s)</b>	No applicable GRI Sector Standard

<b>GRI 2: General Disclosures 2021</b>		
<b>GRI Standards</b>	<b>Disclosure</b>	<b>References in the Report</b>
<b>1. The organization and its reporting practices</b>		
<b>2-1</b>	Organizational details	p. 80
<b>2-2</b>	Entities included in the organization's sustainability reporting	p. 80
<b>2-3</b>	Reporting period, frequency and contact point	p.80-81
<b>2-4</b>	Restatements of information	p. 80
<b>2-5</b>	External assurance	pp. 80,90-92
<b>2. Activities and workers</b>		
<b>2-6</b>	Activities, value chain and other business relationships	pp. 7, 10-11, 19-21, 68, 76
<b>2-7</b>	Employees	p. 39-45
<b>2-8</b>	Workers who are not employees	p. 40

## GRI 2: General Disclosures 2021

GRI Standards	Disclosure	References in the Report
<b>3. Corporate Governance</b>		
<b>2-9</b>	Governance structure and composition	p. 65
<b>2-10</b>	Nomination and selection of the highest governance body	p. 65
<b>2-11</b>	Chair of the highest governance body	p. 65
<b>2-12</b>	Role of the highest governance body in overseeing the management of impacts	pp. 65-66
<b>2-13</b>	Delegation of responsibility for managing impacts	<a href="#">UG's Sustainability Report 2024</a> : Sections: 5.2.1 Board-Level commitment to Sustainability, 5.2.2 ESG Committee, 5.2.3 Sustainability Department
<b>2-14</b>	Role of the highest governance body in sustainability reporting	p. 65
<b>2-15</b>	Conflicts of interest	pp. 65, 76
<b>2-16</b>	Communication of critical concerns	p. 65
<b>2-17</b>	Collective knowledge of the highest governance body	The members of the Board of Directors participate in seminars and conferences related to sustainable development and are also informed by department directors
<b>2-18</b>	Evaluation of the performance of the highest governance body	<a href="#">UG's Sustainability Report 2024</a> : Section 5.1 Building a Strong Governance Structure
<b>2-19</b>	Remuneration policies	According to the individual employment contract of each member of staff
<b>2-20</b>	Process to determine remuneration	<a href="#">UG's Sustainability Report 2024</a> : Section 5.1 Building a Strong Governance Structure
<b>2-21</b>	Annual total compensation ratio	We are still in the process of calculating the annual total compensation ratio, due to the incompleteness of some of our data related to our employee compensation. However, we are actively enhancing our data collection system and we anticipate providing this information by the next reporting cycle.

## GRI 2: General Disclosures 2021

GRI Standards	Disclosure	References in the Report
<b>4. Strategy, policies and practices</b>		
<a href="#">2-22</a>	Statement on sustainable development strategy	p. 3
<a href="#">2-23</a>	Policy commitments	pp. 72-78
<a href="#">2-24</a>	Embedding policy commitments	pp. 41, 45-46, 60, 64, 72-78
<a href="#">2-25</a>	Processes to remediate negative impacts	pp. 69-78
<a href="#">2-26</a>	Mechanisms for seeking advice and raising concerns	pp. 74-75
<a href="#">2-27</a>	Compliance with laws and regulations	p. 75
<a href="#">2-28</a>	Membership associations	p. 11
<b>5. Stakeholder engagement</b>		
<a href="#">2-29</a>	Approach to stakeholder engagement	pp. 19, 83-86
<a href="#">2-30</a>	Collective bargaining agreements	p. 40

## GRI 3: Material Topics 2021

GRI Standards	Disclosure	References in the Report
<a href="#">GRI 3: Material Topics 2021</a>	3-1 Process to determine material topic	pp. 14-15
	3-2 List of material topics	p. 16

## GRI 3: Material Topics 2021

GRI Standards	Disclosure	References in the Report
<b>Management of energy and Greenhouse Gas Emissions</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topic	pp. 14-19, 23-37
<b>GRI 302: Energy 2016</b>	302-1 Energy consumption within the organization	p. 31
	302-3 Energy intensity	p. 31
	302-4 Reduction of energy consumption	p. 30
<b>GRI 305: Emissions 2016</b>	305-1 Direct (Scope 1) GHG emissions	p. 34
	305-2 Energy indirect (Scope 2) GHG emissions	p. 34
	305-3 Other indirect (Scope 3) GHG emissions	p. 34
	305-4 GHG emissions intensity	p. 34
<b>Waste management and circular economy</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topic	pp. 14-19, 23-37
<b>GRI 306: Waste 2020</b>	306-3 Waste generated	p. 36
	306-4 Waste diverted from disposal	p. 36
	306-5 Waste directed to disposal	p. 36
<b>Environmental Legislation</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topic	pp. 14-19, 23-37
<b>Company's Indicator</b>	Number of environmental non-compliances	Zero environmental non-compliances were reported during the reporting period

## GRI 3: Material Topics 2021

GRI Standards	Disclosure	References in the Report
<b>Ethical Practices and competition law</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topic	pp. 14-19, 64-78
<b>GRI 201: Economic Performance 2016</b>	201-1 Direct economic value generated and distributed	p. 12
<b>GRI 205: Anti-corruption 2016</b>	205-1 Operations assessed for risks related to corruption	The Company's Risk Assessment, including risks related to bribery and corruption, pp. 69-71
	205-3 Confirmed incidents of corruption and actions taken	Zero confirmed incidents of corruption were reported during the reporting period
<b>GRI 206: Anti-competitive Behavior 2016</b>	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	In the reporting period there was one inspection of anticompetitive behavior and there were no related losses.
<b>Workers' health, safety and social benefits</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topic	pp. 14-19, 46
<b>GRI 403: Occupational Health and Safety 2018</b>	403-1 Occupational health and safety management system	p. 46
	403-2 Hazard identification, risk assessment, and incident investigation	p. 46
	403-4 Worker participation, consultation, and communication on occupational health and safety	p. 46
	403-5 Worker training on occupational health and safety	p. 46
	403-8 Workers covered by an occupational health and safety management system	100% of the employees are covered by an occupational health and safety management system
	403-9 Work-related injuries	p. 46

## GRI 3: Material Topics 2021

GRI Standards	Disclosure	References in the Report
<b>Diversity and Equal opportunities</b>		
<a href="#">GRI 3: Material Topics 2021</a>	3-3 Management of material topic	pp. 14-19, 39-45
<a href="#">GRI 401: Employment 2016</a>	401-1 New employee hires and employee turnover	p. 43
<a href="#">GRI 405: Diversity and Equal Opportunity 2016</a>	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	pp. 42, 45
	405-1 Diversity of governance bodies and employees	pp. 40, 42
<b>Employee Training</b>		
<a href="#">GRI 3: Material Topics 2021</a>	3-3 Management of material topic	pp. 14-19, 39-45
<a href="#">GRI 404: Training and Education 2016</a>	404-1 Average hours of training per year per employee	p. 44
	404-2 Programs for upgrading employee skills and transition assistance programs	p. 44
<b>Labour Rights</b>		
<a href="#">GRI 3: Material Topics 2021</a>	3-3 Management of material topic	pp. 14-19, 39-45
<a href="#">GRI 406: Non-discrimination 2016</a>	406-1 Incidents of discrimination and corrective actions taken	Zero confirmed incidents of discrimination were reported during the reporting period
<b>Electromagnetic Radiation</b>		
<a href="#">GRI 3: Material Topics 2021</a>	3-3 Management of material topic	pp. 14-19

## GRI 3: Material Topics 2021

GRI Standards	Disclosure	References in the Report
Company's Indicator	Number of external inspections	In 2024 were carried out electromagnetic radiation inspections in 480 sites and no exceedances of safe public exposure limits were found.
<b>Support for local communities</b>		
GRI 3: Material Topics 2021	3-3 Management of material topic	pp. 14-19, 47-60
Company's Indicator	Nova's flagship CSR program	pp. 47-60
<b>Ensuring confidentiality, communication and personal data protection</b>		
GRI 3: Material Topics 2021	3-3 Management of material topic	pp. 14-19, 64-78
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	The Company maintains the strictest policies to ensure the confidentiality, integrity and availability of the personal data of its customers and takes all necessary measures to ensure their protection and processing in terms of transparency and always in accordance with the requirements of the legislative framework. If we find that there is a data breach, we will inform the affected consumers and the competent authorities.
<b>Accessibility, affordability and customer service</b>		
GRI 3: Material Topics 2021	3-3 Management of material topic	pp. 14-19, 59
Company's Indicator	Customer Satisfaction	p. 59
<b>Quality of service</b>		
GRI 3: Material Topics 2021	3-3 Management of material topic	pp. 14-19, 77-78
Company's Indicator	Certified Quality Management System	pp. 77-78

## GRI 3: Material Topics 2021

GRI Standards	Disclosure	References in the Report
<b>Innovation and digital transformation</b>		
GRI 3: Material Topics 2021	3-3 Management of material topic	pp. 14-19, 47-60
Company's Indicator	“Smart” projects with social impact	pp. 54-55
<b>Network investments</b>		
GRI 3: Material Topics 2021	3-3 Management of material topic	pp. 9-10, 14-19
Company's Indicator	Fiber Network Expansion and 5G Rollout	p. 9
<b>Procurement practices</b>		
GRI 3: Material Topics 2021	3-3 Management of material topic	pp. 14-19, 76
Company's Indicator	Responsible procurement practices	p. 76
<b>Rights and protection of children</b>		
GRI 3: Material Topics 2021	3-3 Management of material topic	pp. 14-19, 47-60
Company's Indicator	Social Solidarity - Donations	pp. 53, 56-57

# Feedback Form – Sustainability Report 2024

## Which Nova's stakeholder group do you belong to?

<input type="checkbox"/> Shareholders and Investors	<input type="checkbox"/> Customers (Individuals)	<input type="checkbox"/> Customers (Businesses)	<input type="checkbox"/> Employees	<input type="checkbox"/> Commercial Network
<input type="checkbox"/> Parents – Educators	<input type="checkbox"/> Academic Community	<input type="checkbox"/> ESG Analysts – Rating Agencies	<input type="checkbox"/> Local Communities	<input type="checkbox"/> NGO
<input type="checkbox"/> Local Government	<input type="checkbox"/> State / Government Agencies	<input type="checkbox"/> Media	<input type="checkbox"/> Policymakers/Regulatory Authorities	<input type="checkbox"/> Suppliers

## Based on the information presented in this, how would you evaluate Nova's Sustainability Report 2024?

Excellent       Good       Average       Needs improvement

## How easy was it to find information on topics of interest to you in the Report?

Very easy       Quite easy       Relatively easy       Not easy at all

**With respect to the information presented in the Report, how closely do you agree with the following statements?**

(1) Strongly disagree, (2) Disagree, (3) Neither agree/Nor disagree, (4) Agree, (5) Strongly agree

	1	2	3	4	5
1. The principles and topics you consider necessary for the Company's sustainable development are sufficiently covered					
2. There is a good balance and clarity among the different Report sections					
3. The structure has a nice flow, and the Report is easy to read					
4. The graphical representation of the information is clear					
5. The visual aspect is satisfactory and the infographics included positively enrich the Report					

**Please highlight any topics that have not been reported and should be included in the next Report:**

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**Please describe your key concerns and/or issues that you have identified during your collaboration with Nova.**

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Please send the completed evaluation form (by post or digital) to the following address:  
Leof. Athinon 106, Athina 104 42  
Tel.: 21 0615 8000  
E-mail: [sustainability@nova.gr](mailto:sustainability@nova.gr)

# NOVA

Find out more about Sustainability at Nova:

