Sustainability Report 2023.

NOVA

Contents

1. CEO Message

Dear friends and partners,

As we reflect on the past year, we are encouraged by both the economic landscape in Greece and our own strides toward innovation, growth, and sustainability. The Greek economy is on a promising trajectory, with growth exceeding 2%, declining inflation, and improving fiscal indicators. This stability, alongside upgraded credit ratings for Greek banks, provides an optimistic foundation for sustainable development and competitiveness— a future where Greece can transcend past economic challenges and build a resilient, forward-looking economy.

In the telecom and entertainment sectors, we also materialized progress. A significant step-up in coverage of fiber-to-the-home, where United Fiber had a landmark year, and the channel exchange agreement that consolidated all premium sports content at a very affordable price were the highlights of the year.

Through our parent company, United Group's €2 billion investment program for Greece, we have invested more than €800 million to date, achieving 95% 5G coverage and reaching 540,000 homes passed of fiber-to-the-home rollout. On top, our recent launch of the copper-free Nova 5G Home Internet solution unleashes the capability for gigabit speeds to Greek households, exemplifying our drive to deliver cutting-edge connectivity.

At Nova, sustainability is not just a commitment but a core part of our identity. We further engrained our eco-friendly practices and community engagement initiatives, focusing on reducing our carbon footprint and supporting environmental programs in our local communities. Projects like the "Smart Forest" on Mount Ymittos, powered by artificial intelligence and real-time data, underscore our belief that technological innovation can be a powerful solution for environmental protection. Our approach to sustainability goes hand in hand with our mission to serve the long-term interests of both our customers and our planet.

Looking forward, we are at a critical juncture towards becoming a Gigabit and AI society. As we move forward, I thank you for your support and partnership. Together, we are shaping a brighter, more sustainable future for telecommunications and entertainment in Greece, while working to achieve the 2030 targets of the EU Digital Agenda.

Wishing you an insightful read,

Panayotis Georgiopoulos, CEO at Nova

2. Nova at a glance

ENVIRONMENT

1,392,596 L Fuel consumption

125,013.41 MWh Electric Energy consumption

55% reduction in Scope 1 & 2 emissions

74% coverage from renewable energy sources

SOCIAL

39% Women employees

1,371 Employees trained

0 Fatalities due to work – related injuries

6,658.82 Training hours

GOVERNANCE

0 Incidents of corruption / bribery

13 Policies

89% completion rate of the Code of Conduct Training

38mil € Invested in network expansion

3. The Company

3.1 Group's Presentation

Nova Telecommunication & Media Single Member S.A.

Nova is the company that introduced Greece to the Internet, mobile telephony, and subscription-based television, revolutionizing the way people connect and communicate. As a member of United Group, the largest telecommunications and media group in Southeast Europe, Nova represents the integration of Nova and Wind Hellas. Serving approximately 5 million subscribers, it offers a comprehensive range of services, including subscription-based television, broadband Internet, mobile, and fixed telephony. With a rich legacy of innovation, Nova is strengthened by the international expertise, technical knowledge, and strategic investments of United Group in Greece.

By combining its cutting-edge solutions, Nova aims to provide individuals and businesses in Greece with the tools they need to simplify daily life and enhance their competitiveness within the European Union. Consistently at the forefront of progress, Nova continues to invest, innovate, and play a key role in driving the next phase of Greece's transformation.

United Fiber Single Member S.A.

United Fiber is dedicated to accelerating the development of next-generation networks, focusing on Fiber to the Home (FTTH) and Fiber to the Office (FTTO) solutions. By emphasizing technological advancement, innovation, and best practices, United Fiber is driving the implementation of United Group's ambitious investment in the construction of Nova Fiber, a state-of-the-art proprietary fiber-optic network. This cutting-edge network is set to exceed 22,000 kilometers, aiming to connect 1.6 million households across Greece by 2027.

United Fiber is at the forefront of building the infrastructure that will define the future of connectivity in Greece.

Nova ICT S.A.

Nova ICT stands as a leading system integrator, dedicated to empowering businesses and public organizations to achieve their fullest potential. Recognizing the complexities of today's technological landscape, it bridges the gap through seamless integration solutions that streamline operations and open doors to new opportunities. With a commitment to innovation, speed, and quality, Nova ICT ensures that its clients' ventures are not just sustainable but thrive in a competitive market.

Leveraging state-of-the-art technologies and an extensive base of expertise, Nova ICT provides a comprehensive range of ICT solutions to public bodies and businesses across Greece and the EU. From intricate software systems to robust hardware infrastructures, it specializes in delivering tailored, forward-looking strategies. These solutions are designed to meet the unique needs of each client, driving them toward sustained success in an ever-evolving digital era.

Nova ICT connects the dots between technology and opportunity, enabling organizations to transform challenges into achievements.

Companies

01 Nova Telecommunications & Media
Telecommunications services, including mobile, fixed telephony, broadband, and subscription-based television

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

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

3.2 Vision and values

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.

Our values reflect the principles of United Group, emphasizing 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.

We champion several key principles that guide our corporate culture and operational approach:

- ✓ Acting with integrity by taking accountability for our impact on the environment, society, and future generations, always prioritizing honesty and fairness.
- ✓ Emphasizing simplicity by focusing on essential actions and eliminating unnecessary complexity in our processes.
- ✓ Demonstrating flexibility by adapting swiftly to market demands and challenges, ensuring our services and products remain relevant and responsive.
- ✓ Fostering entrepreneurship through ownership and dedication to the highest quality work for our clients.
- ✓ Promoting teamwork by nurturing collaboration and recognizing the potential of our team members.
- ✓ Driving innovation to develop solutions that improve quality of life while minimizing environmental impact.
- ✓ Upholding inclusion by cultivating a diverse and inclusive workplace, committed to equality and equal opportunities for all.
- ✓ Acting with responsibility in every decision, mindful of our duties to the environment, society, and future generations.
- ✓ Strengthening collaboration by working with partners, employees, and communities to achieve shared goals and tackle global challenges.
- ✓ Embedding sustainability as a core principle in every activity, balancing financial success with social and environmental responsibility to secure a sustainable future.

These principles reflect who we are at Nova and our unwavering commitment to creating positive change through our actions and services.

Collaboration

Sustainability

Responsibility

Flexibility

Inclusion

Innovation

Integrity

Teamwork

Entrepreneurship

Simplicity

3.3 Company's History

The telecommunications operator under the Nova brand is the result of the integration of Wind and Nova.

Nova's journey began in 1993 with the establishment of Forthnet, founded by Minoan Lines and the Technology and Research Foundation (ITE). It became the first spin-off company in Greece created by a research institution. The name "Nova" gained prominence in June 2021, derived from the satellite television platform launched in Greece in December 1999 by Naspers.

Wind commenced operations in 1992 as the first company in Greece to receive a license for creating a national GSM mobile network. Initially known as Telestet, the company rebranded

to TIM Hellas in 2004 and later to Wind in 2007. Now a part of United Group, the largest telecommunications and media group in Southeast Europe, Nova offers a wide range of services, including pay TV, broadband internet, and mobile and fixed telephony, serving approximately 5 million subscribers. With a rich heritage of innovation, Nova benefits from United Group's international expertise, knowledge, and investment plan for Greece. By continuously developing solutions, Nova aims to provide individuals and businesses in Greece with tools that simplify daily life and enhance competitiveness compared to other EU countries. Nova remains committed to innovation, investment, and contributing to Greece's next phase of transformation.

Telestet is founded — **1992**

The first mobile phone call is made in our country by the Telestet network — **1993**

Telestet is renamed to Wind Hellas — **2001**

The development of Wind Hellas' fiber optic network begins — **2016**

Wind Vision pay-TV platform is established — **2018**

The operation of the 5G network begins in Athens and Thessaloniki — **2020**

Wind Hellas joins United Group, the leading telecommunications and media operator in Southeast Europe — **2022**

The beginning of the operation of Nova in its current form — **2023**

Forthnet S.A. is founded, the first company that brought the Internet to Greece. — **1993**

Forthnet was the first company to bring pay-TV to Greece — **1995**

Forthnet is renamed to Nova

Nova joins United Group, the leading telecommunications and media operator in Southeast Europe — **2021**

3.4 Products & Services

Nova				
Individuals		**Business**		
Fixed & internet plans				
Internet ADSL	Fiber (50, 100, 200, 300, 500)	Business 2play ADSL	Business Fiber (50, 100, 200, 300, 500)	Nova WiFI
Internet 50	Fiber 1Giga	Business Fiber 1Giga	Nova Telephony Solutions	Nova Leased Lines
Internet 100	Double Play Basic	One Pro Cloud	Nova DDoS	Nova Secure SD-WAN & Nova SD-WAN, Nova MPLS VPN
2 play ADSL	Double Play Sat	Nova MS Teams Telephony	Nova Firewall As A Service	Nova EMM
4G Home Internet	5G Home Internet	Nova Internet Solutions	Nova Push To Talk	Free number (800), One number (801), Premium Services (90)
EON TV				
EON	EON+	EON TV Public View	EON TV Private View	
Combined programs		**Combined programs**		
ADSL EON	Fiber 1Giga EON	Business Fiber (50, 100, 200, 300, 500) & EON Sports	Business 2Play & EON Sports	Business Fiber 1Giga & EON Sports
Fiber (50, 100, 200, 300, 500) EON	Fiber 100 EON+	**Fleet Management programs**		
ADSL EON+	Fiber (100, 200, 300, 500) EON+	NOVA Fleet Management	NOVA Fleet Premium	Nova Fleet Plug n Play
Fiber 1Giga EON+	5G Home Internet + EON	**Datacenter Services**		
5G Home Internet + EON+		Colocation Hosting	Dedicated Hosting	Cloud Server
		Cloud Backup	DRaaS	MS365
Mobile – contract plans		**Mobile – contract plans**		
Unlimited+ 2GB	Unlimited+ 20GB	Business Unlimited+ 2GB	Business Unlimited+ 20GB	
Unlimited+ 10GB	Unlimited ALL	Business Unlimited+ 10GB	Business Unlimited ALL	
Card connection		**Professional refrigerator management programms**		
FREE2GO	Q	NOVA Freeze Alert		

3.5 Value chain

At Nova Greece, our value chain forms the backbone of our operations as a leading telecommunications provider. It encompasses a series of interconnected strategic and operational activities designed to deliver high-quality services while embedding sustainability principles into everything we do as part of the United Group. Each stage of our value chain, from infrastructure development to customer service, reflects our commitment to operational excellence, resilience, and environmental responsibility.

OUR VALUE CHAIN

Inputs	Business Activities	Outputs	Outcomes
Financial Capital — Our financial resources enable us to fund infrastructure development, research, and operational excellence while driving long-term value creation for stakeholders.	Nova Greece offers an extensive portfolio of products and services designed to meet the diverse needs of residential and business customers. These include fixed and mobile telephony, broadband internet services, and pay television. Leveraging advanced technologies, Nova provides reliable and high-speed connectivity, supported by its proprietary 10 Gigabit fiber-optic network and a robust 5G infrastructure. Its broadband services cater to both home users seeking ultra-fast internet and businesses requiring tailored connectivity solutions. In mobile telephony, Nova ensures nationwide coverage and international roaming capabilities, making it a key player in Greece's telecom landscape.	**Fixed Telephony Services** — Reliable and high-quality voice communication for residential and business users.	**Customer Satisfaction** — Consistently high-quality services that enable connectivity, productivity, and entertainment for individuals and businesses.
Human Capital — Skilled professionals are at the heart of our operations bringing expertise in technology, customer service, and innovation.		**Mobile Telephony Services** — Nationwide and international connectivity through advanced 5G infrastructure.	**Economic Contribution** — Supporting Greece's digital economy through investments, job creation, and technological advancements.
Productive Capital — We deploy advanced telecommunications infrastructure, including fiber-optic networks, data centers, mobile towers, and cutting-edge IT systems, to ensure the reliable delivery of high-quality services.		**Broadband Internet Services** — High-speed internet via fiber-optic networks, tailored for both home and enterprise needs.	**Sustainability Progress** — Reducing greenhouse gas emissions, optimizing energy usage, and promoting a circular economy in line with global sustainability goals.
Intellectual Capital — Our expertise, proprietary technologies, and innovative approaches drive efficiency and differentiation in the telecom sector.	In addition to core telecom services, Nova offers an enriched entertainment experience through its pay-TV services, which feature exclusive content, live sports, and on-demand options. The company also delivers integrated ICT solutions for businesses, including cloud services, cybersecurity, and smart city applications, aimed at supporting Greece's digital transformation. With over 200 retail stores across the country, Nova ensures accessibility and personalized service, reinforcing its position as a leader in the Greek telecommunications and digital services market.	**Pay-TV Services** — A diverse selection of premium entertainment, live sports, and on-demand content.	**Social Impact** — Enhancing digital inclusion and accessibility for underserved communities, bridging the digital divide, and empowering people through technology.
Natural Capital — As part of our commitment to sustainability, we responsibly utilize natural resources such as energy and materials while prioritizing renewable energy sources and resource efficiency to minimize environmental impact.		**Integrated ICT Solutions for Businesses** — Cloud services, cybersecurity tools, and smart connectivity solutions designed to support digital transformation.	
Social Capital — Strong relationships with customers, suppliers, regulatory bodies, and the broader community underpin our operations.			

3.6 Digital Transformation and Infrastructure Investment

3.6.1 Infrastructure Investment

In 2023, Nova made substantial investments to expand and enhance its telecommunications infrastructure across Greece. Recognizing the rising demand for high-speed connectivity and reliable service, Nova prioritized upgrading its network to support more robust data traffic and improve service quality. Key initiatives included:

Fiber Optic Expansion

Major investments were directed towards expanding Nova's fiber optic network, targeting increased coverage in urban and suburban areas. This strategic move aims to provide faster, more reliable internet to both residential and business customers, allowing Nova to better serve an increasingly digital society.

5G Rollout and Enhancement

Nova accelerated the deployment of 5G technology, extending coverage to more regions across Greece. This expansion not only supports higher data speeds but also accommodates the increasing number of devices reliant on mobile connectivity, from IoT applications to everyday consumer needs. In 2023, Nova achieved 5G network coverage of major urban areas and 74% of the nation in total, targeting an impressive 98% by the end of 2024. This expansion allows customers in both mainland Greece and islands, such as Crete and Mykonos, to experience high-speed internet, including 1 Gbps speeds in some regions.

Network Security and Stability

Recognizing the critical importance of data security and seamless service, Nova invested in infrastructure that strengthens network resilience and mitigates disruptions, ensuring a secure, uninterrupted experience for users.

3.6.2 Digital Transformation

Nova brings innovation, speed and quality through a full range of services making sure our clients' businesses can thrive. Through our sister company, Nova ICT, and using state-of-the-art technologies and taking full advantage of its know-how, we offer a wide range of ICT solutions to Public Bodies and Businesses throughout Greece and EU. From intricate software solutions to robust hardware systems, we offer a wide range of digital transformation services designed to meet the evolving needs of various industries, including:

Civil protection: Natural disasters increasingly threaten public safety and critical infrastructure. Our civil protection solutions integrate real-time data collection, AI-powered cameras, and advanced sensors to provide actionable insights. These tools enhance situational awareness, enabling faster responses and better resource allocation during emergencies.

Smart cities & IoT: Smart cities address challenges like urbanization and environmental degradation. We deliver IoT-driven solutions tailored to modern urban needs, covering mobility, energy efficiency, governance, urban planning, and circular economy. Our offerings align with EU smart city initiatives, driving sustainable development.

Digitization of Physical Archives: Preserving history and improving access to information are essential. We use advanced scanning technologies, AI, and OCR software to transform physical archives into searchable digital resources, ensuring accuracy and efficiency in the digitization process.

Digital Culture: We digitize historical documents, artworks, and folklore to preserve cultural heritage. Using AR and VR technologies, we create immersive experiences such as virtual tours of landmarks and interactive storytelling, ensuring cultural legacies remain accessible in the digital era.

Digital Health: Digital health enhances healthcare efficiency and accessibility. We specialize in integrating eHealth solutions to streamline processes, improve patient outcomes, and facilitate data exchange between healthcare providers and patients.

Digital Education: Technology transforms how we learn. We integrate educational technology solutions to empower institutions, educators, and students with innovative tools, preparing learners for 21st-century challenges.

Custom Integration Solutions: Our team collaborates with clients to develop custom integration solutions tailored to their unique needs, enhancing system efficiency and driving innovation.

Custom Software Development: We create custom software solutions that improve business efficiency and user experiences. From concept to implementation, we transform ideas into scalable applications.

IT Solutions & Services: Our consultants provide strategic guidance to optimize IT infrastructure, addressing current challenges and preparing businesses for future technological demands.
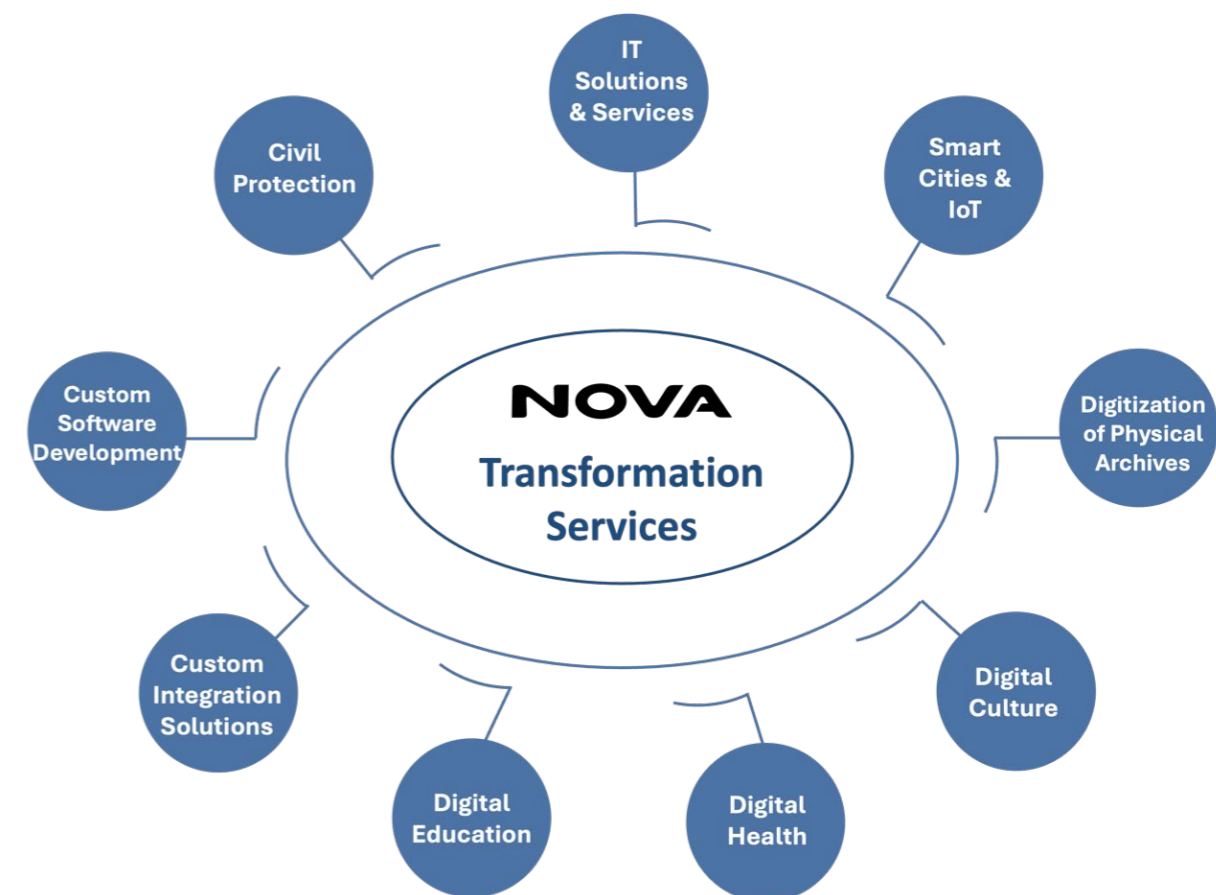
3.6.3 Completed Digital Transformation Projects

We are very proud of our rich portfolio and the important projects we have completed:

Project	Description
Protection and Development of Hymettus Mountain	This project enhances disaster preparedness and promotes the cultural heritage of Hymettus Mountain through digital infrastructure and public engagement tools.
Teleconferencing in Courts and Penitentiaries	We implemented teleconferencing systems in courts and penitentiaries, facilitating secure remote testimonies for vulnerable witnesses and improving operational efficiency through digital court registers.
Historical Museum for Olympus Revolution	This project uses VR, 3D animations, and interactive technologies to create a museum celebrating the Olympus Revolution, enhancing public engagement with regional history.
Digital Exhibition in Salamina Municipality	The initiative highlights the historical significance of Salamina's battleship through VR-enhanced exhibitions, offering visitors an interactive educational experience.
Digital Museum for 1821 Revolution History	Using virtual reality and interactive technologies, this museum commemorates the Greek Revolution, celebrating local heroes and fostering historical appreciation.
Public Hospitals' Fiber Optic Connection	We connected public hospitals and health institutions to the GRNET fiber optic network, improving communication and efficiency in the healthcare sector.
e-Schools Digital System	This project modernized Greece's primary and secondary education systems by integrating new digital tools, streamlining data access, and improving educational outcomes.
Robotics & STEM Labs in Schools	Providing robotics kits to schools fosters critical thinking and technical skills, preparing students for careers in technology and engineering.

Project	Description
Interactive Learning Systems	We equipped schools with interactive learning systems, enhancing student engagement and educational outcomes through gamified, collaborative tools.
Digital Platform for Nikos Kazantzakis Museum	By digitizing archival materials, this initiative preserves Kazantzakis's legacy and offers interactive museum experiences to connect visitors with his life and work.
Natural Environment & Climate Change Agency (N.E.C.C.A.) ESG System	We developed a system to collect and present ESG indicators, promoting sustainability and transparency in environmental practices.
History Museum of Ioannina Medical University	This project digitized medical artifacts and created interactive applications, preserving the region's medical heritage and enhancing learning opportunities.
Virtual Museum for Mikis Theodorakis	We created a virtual museum celebrating Mikis Theodorakis through interactive content and digital tools, ensuring his legacy endures.
Unified CO_2 Emissions Information System	This public-access database tracks carbon emissions across sectors, supporting sustainability efforts and fostering climate awareness.
Urban Green Irrigation and Flood Prediction Systems	This project includes smart irrigation and flood prediction systems to promote sustainable water management and enhance urban resilience.
Real-Time Rain Flow Monitoring in Marousi	We provided a real-time rain monitoring system for Marousi, enabling effective flood management and improved municipal response strategies.

3.7 Participation in institutional bodies, industry associations and committees - Distinctions

Participation in institutional bodies, sectoral associations, and committees enables Nova to contribute to the advancement of the telecommunications sector by exchanging expertise and promoting sustainable development practices. This active involvement also enhances entrepreneurship and strengthens the country's competitiveness.

Professional Agencies

Association of Mobile Telephony Companies (AMTC)

Hellenic Advertisers Association (HAA)

The Federation of Hellenic ICT Enterprises (SEPE)

Hellenic Federation of Enterprises (SEV)

Greek People Management Association (GPMA)

Agencies for Sustainable Development

UN Global Compact Network Greece

Sustainable Greece 2020 - Sustainability Ambassador

Responsible Business Alliance (RBA)

BSE Council for Sustainable Development

Distinctions

Hellenic Responsible Business Awards

Nova received dual honors at the Hellenic Responsible Business Awards 2023 for its contributions to society and the environment, winning a Gold award in the "Technology & Health" category and a Silver in "Technology & Environment." The Gold award was for an innovative pilot program that uses drones to transport pharmaceuticals and medical supplies to the inhabited islands of the small Cyclades. Conducted in partnership with UCANDRONE, this program supports both regular and emergency deliveries of medications and blood samples. Powered by 5G technology and AI, the project reduces transportation costs and energy consumption while ensuring timely medical assistance for residents. Nova also won Silver for its pioneering fire detection initiative in the Syngrou Forest in Marousi. Developed in collaboration with Huawei Technologies S.A., PROBOTEK, and with guidance from the Institute of Agricultural Sciences (IGE), this project integrates 5G, AI, and drone technology to enhance fire detection and early response, providing valuable protection for fire-prone areas. Through these initiatives, Nova continues to focus on improving quality of life for local communities and safeguarding the environment.

Miltos Tendoglou Honored with Nova Ethos Award at Hellenic Olympic Committee Ceremony

Miltos Tendoglou, Olympic gold medalist in the long jump, was honored with the Nova Ethos Award at the Hellenic Olympic Committee's annual awards ceremony, held on January 17 at the EOE Amphitheater and broadcast live on Novasports. As the Gold Communication Sponsor, Nova proudly supports Greek athletes and celebrates their achievements. The Nova Ethos Award, established to recognize an athlete who embodies the spirit of Greek sports and the Olympic ideal, was presented by Ms. Kiki Silvestriadou, CEO of Nova Media, to Tendoglou in recognition of his outstanding contributions and sportsmanship.

Compliance Awards

At the Compliance Awards 2023 in Greece, Nova was honored in five major categories, reflecting its commitment to high standards in corporate governance and ethical business practices. The company received a Gold award for "Best Compliance Whistleblowing Project" for its Support & Reports Line, a Silver award for "Best Digital Transformation," and three Bronze awards for "Best Compliance Team in the Telecoms, Media & Technology sector," "Best Compliance Awareness Activity: Compliance Ethics and Culture," and "Most Impactful Environmental Initiative." Nova's Compliance Program is grounded in its Code of Business Conduct & Ethics, Code of Conduct for Suppliers & Partners, supplementary Regulatory Compliance Policies, and affiliations with international transparency and sustainability organizations, all contributing to a foundation of trust and credibility with stakeholders.

Nova is close to the Brave Children of ELEPAP

At Christmas, Nova stands by the "Brave Children" of ELEPAP, actively supporting the great work of the organization. Nova employees actively participated in ELEPAP's festive bazaars, shopping at the company's headquarters and through the ARTεμείς e-shop, with all proceeds going to support rehabilitation treatments for children with disabilities. In addition, Nova is quintupling the number of employee purchases, boosting the contribution to ELEPAP. During the festive season, employees collect toys for the educational needs of children, offering moments of joy and support to families in need.

4. Sustainable Development

4.1 Sustainability Priorities

Having recognized how crucial sustainability is to our long-term success, and to successfully address the associated challenges, we implement actions to mitigate our environmental impact and create a positive social footprint. In that term, we have established sound corporate governance structures to uphold transparency, integrity, and accountability throughout our operations, and we have established the following sustainability priorities:

- Environment
- Our People & Society
- Customer Experience
- Sound Governance

4.2 Stakeholders

For the year 2023, Nova has continued to follow the same approach for identifying and analyzing material issues that affect the company and its Stakeholders, as no new materiality analysis was conducted this year. The company remains committed to the findings and methodology established in the previous year, which continue to guide its sustainability strategy and decision-making processes.

Nova recognizes the Stakeholders who significantly influence the company's decisions and strategies, as well as those who are directly or indirectly impacted by its operations. The identification of Stakeholders is based on ongoing engagement with all relevant parties and thorough research to ensure their accurate representation.

In particular, all Stakeholders of companies operating within the same sector as Nova were carefully monitored and recorded, resulting in the formation of 15 categories of Stakeholders. These categories include those who are part of the company's internal environment, as well as those who operate in the external environment, both domestically and internationally.

The Stakeholder categories are presented below:
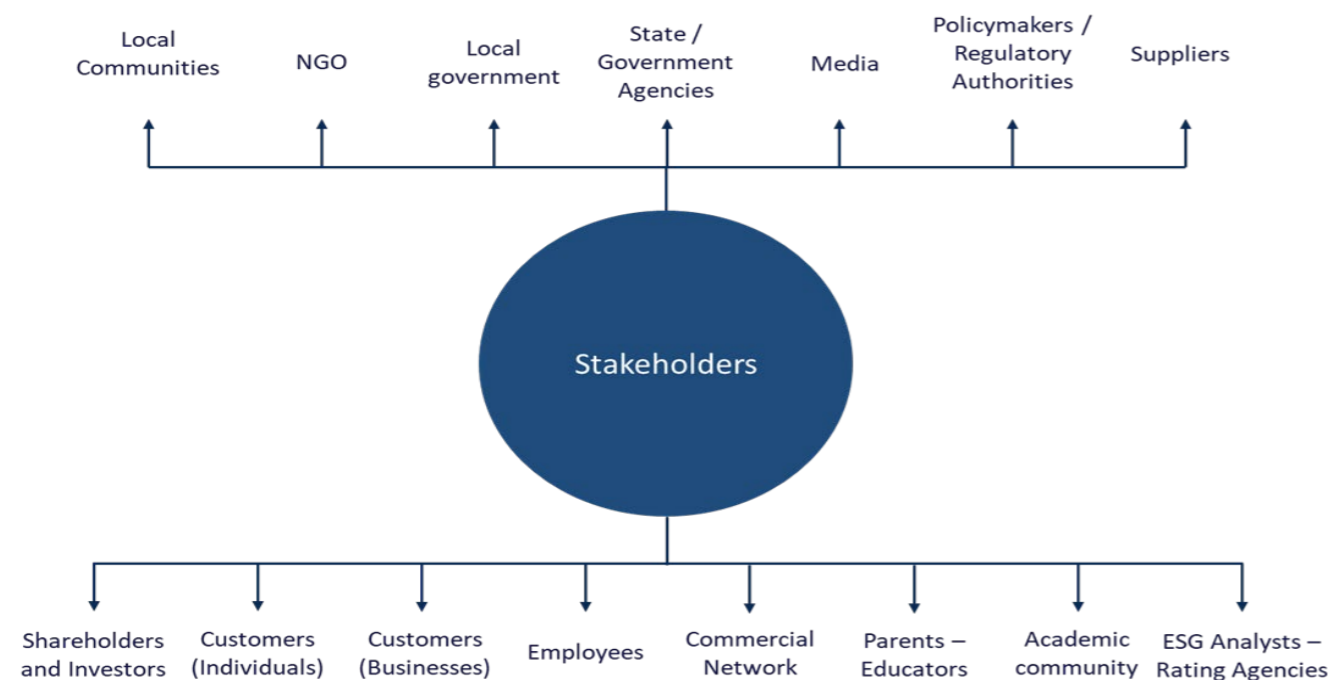
Stakeholder Engagement

Nova places great importance on maintaining an active and open dialogue with its Stakeholders. Depending on the category of Stakeholders and the issues that concern or affect them, the company utilizes a variety of communication methods. These methods include regular meetings where Stakeholders' expectations and priorities are discussed, as well as conferences, workshops, and targeted surveys in the form of questionnaires to capture their feedback and perspectives.

The insights gathered from these meetings and interactions are integrated into the company's materiality analysis process. Although a new materiality assessment was not carried out for 2023, Nova continues to rely on the comprehensive evaluation conducted in 2022. This analysis remains relevant and has been instrumental in shaping the company's strategic direction in terms of sustainability and responsible corporate practices.

Stakeholders	Contact Channels/Modes of Communication	Key issues of interest
Shareholders & Investors	Information through the media Electronic communication Telephone communication Information via a website Face-to-face Communication	Information on corporate actions, general meetings, obligations of major shareholders, dividends, shareholder composition
Parents / Educators	Emails Telephone communications Written instructions Quality assurance policies	Strategic organization of the Company Effective management Achievement of objectives Proper operation
Employees	Interpersonal communication Electronic communication Continuous education and training	Excellent working conditions Safe work Well paid work Communication with management Lifelong training
Suppliers	Telephone communication Emails Interpersonal communication	Seamless operation Regular operation Reliability in transactions
NGO	Company website Public Relations Department Sustainable Development Report	Contribution to the objectives of the NGOs Financial support Public awareness raising
Local government	Telephone communication Electronic messages Live communication Regular and ad hoc communication (open door policy, meetings, participation in local events).	Compliance with the legislation Immediate repayment of social security and tax debts Protection of the natural environment Protection of human rights
Customers (individuals)	Information via the website	Providing quality services Providing products and services at competitive prices

Customers (Businesses)	Electronic communication Telephone communication Information via web page	Immediate and secure service provision Competitive cost products Quality products and services
Policymakers / Regulatory Authorities	Regular and ad hoc communication (providing data and information through questionnaires, meetings, participation in consultations). Participation in stakeholder events on an annual basis	Defining Substantive Sustainable Development Issues. Compliance and updating of legislation
Media	Conferences Press releases Publications and press releases Regular meetings with representatives	Announcements Mergers, acquisitions and other investments Community contribution stories Research and development Ensuring accurate and timely information
State / Government Agencies	Consultation with representatives of the State and institutional authorities at national and/or regional level Participation in conferences and events of sectoral or general business interest Publications and articles	Climate change, RES Sustainable finance Circular economy Compliance with conventional and environmental conditions Health and safety
Local Communities	Information through the media Information via website	Uninterrupted supply Supply safety Protection of the natural environment
Commercial Network	Electronic communication Telephone communication Information via web page	Announcements Mergers, acquisitions and other investments Research and development Ensuring accurate and timely information
ESG Analysts – Rating Agencies	Meetings with representatives of stakeholders Correspondence Corporate website	Environmental protection Implementation of social actions Health and safety of employees Implementation of corporate governance standards and principles ESD data
Academic Community	Meetings with representatives of the academic community Correspondence Corporate website Online conferences	Research and Development(R&D) Technology transfer Education and training Social responsibility

By sustaining an open line of communication with its Stakeholders and closely monitoring the evolving landscape of material issues, Nova ensures that its business remains aligned with both internal priorities and external expectations, reinforcing its commitment to long-term sustainable growth.

4.3 Materiality Analysis

4.3.1 Identification and Determination of Material Issues

Nova has implemented a structured approach to evaluate and incorporate issues that directly influence its operations and stakeholder decision-making. This comprehensive process spans multiple levels, involving detailed analysis and research, and was most recently completed in 2023 for the preparation of the 2022 Sustainability Report.

The process begins with an extensive literature review and an analysis of Sustainability Reports from other companies within the same industry. This step gathers valuable data from both internal and external sources, enabling Nova to draw on lessons learned and adopt best practices.

Next, international and industry-specific sustainability standards, particularly the SASB standards relevant to telecommunications services, were examined. This ensures alignment with global requirements and provides a solid foundation for creating robust sustainability reports.

Additionally, key issues identified in previous Sustainable Development Reports from Wind Hellas and prior materiality assessments were leveraged, ensuring that Nova's priorities reflect the real concerns and expectations of its stakeholders.

In the final stage, Nova's Sustainability team reviewed and updated the list of material issues to ensure compliance with standards and maintain transparent communication on the company's key sustainability topics.

Identification of Purpose and Scope — Research on International Standards & Industry Mapping — Data Analysis and Impact Assessment — Materiality Matrix

4.3.2 Prioritization of Material Topics

In 2023, Nova completed its process of identifying key material topics and developed an electronic questionnaire to engage its primary stakeholders. The objective was to capture insights on sustainability issues that are most relevant to the company and its stakeholders, ensuring alignment with Nova's strategic priorities and commitment to sustainable development.

Two separate questionnaires were designed to address the unique perspectives of different stakeholder groups. One targeted internal stakeholders, such as employees, shareholders, and the Board of Directors, while the other was aimed at external stakeholders, including customers, suppliers, and media representatives. This approach ensured that Nova gathered comprehensive feedback, reflecting the priorities and concerns of both internal and external audiences.

By focusing on the relevance and significance of these topics to the company and its stakeholders, the process provided a robust foundation for shaping Nova's sustainability strategy and addressing the issues that matter most to its long-term success and impact. Through this process, Nova identified 17 material issues, which are outlined in the table below.

Nova's Material Topics		SDGs
●	1. Employee Training	
●	2. Network investments	
●	3. Innovation and digital transformation	
●	4. Labour Rights	
●	5. Management of energy and Greenhouse Gas Emissions	
●	6. Waste management and circular economy	
●	7. Environmental Legislation	
●	8. Procurement practices	
●	9. Electromagnetic Radiation	
●	10. Workers' health, safety and social benefits	
●	11. Diversity and Equal opportunities	
●	12. Ethical Practices and competition law	
●	13. Support for local communities	
●	14. Accessibility, affordability and customer service	
●	15. Ensuring confidentiality, communication and personal data protection	
●	16. Quality of service	
●	17. Rights and protection of children	

● E   ● S   ● G

4.3.3 Prioritization of Material Topics based on questionnaire results

The processing of the survey results, illustrated in the diagram, highlights the significance of the 17 material issues identified by Nova's stakeholders.

Nova emphasizes that all 17 material topics remain integral to its responsible business approach, with a focused effort on addressing the six issues assessed as the most essential. These priorities underline the company's commitment to sustainable development and its ongoing efforts to align with stakeholder expectations while driving long-term value.

The 2023 Sustainable Development Report addresses all 17 material issues comprehensively, with particular attention given to the top six priorities. The diagram below visually represents the importance of these material issues as assessed by stakeholders, reflecting their relevance to Nova's operations and sustainability objectives.

Materiality Matrix

4.4 Sustainable Goals for Nova

The materiality assessment process, carried out through the distribution of questionnaires to Nova's Stakeholders, played a key role in identifying essential goals for the company's sustainability strategy in the foreseeable future. The analysis of the results led to the classification of material issues, primarily based on their positive impact on the environment and society, as well as the company's capacity to mitigate potential negative effects on both.

Below is the list of the top six material issues, ranked based on their significant impact on the environment and society:

Top Material Issues with Significant Impact:

Diversity & Equal Opportunities **01**	Innovation & Digital Transformation **02**	Network Investments **03**
Procurement Practices **04**	Employee Training **05**	Labour Rights **06**

The output of this list has led to the identification of new strategic goals for Nova, which contribute to the continuous monitoring and management of these key material issues. These objectives are based on ESG (Environment, Social, Governance) criteria and are aligned with recognized international sustainable development standards such as GRI (Global Reporting Initiative) and SASB (Sustainability Accounting Standards Board). Furthermore, they are in accordance with the European Green Deal's goal of achieving climate neutrality by 2050 and the United Nations Sustainable Development Goals (SDGs) for 2030.

Nova's priority remains the integration of these new objectives into its daily operations, reinforcing its commitment to embedding the principles of Sustainable Development throughout the business. By doing so, the company aims to create lasting value for all its Stakeholders and encourages their active participation in achieving these goals.

In presenting the following objectives, organized under the pillars of Environment, Society, and Governance, Nova commits to a strategy built upon initiatives and actions with a strong human-centric and environmental focus. The goals are closely aligned with the 17 Sustainable Development Goals, with Nova's contributions integrated into the company's broader business strategy.

4.5 Sustainability Targets

By structuring its sustainable development goals in this manner, Nova continues to prioritize the environment, society, and governance. These efforts reflect the company's commitment to contributing meaningfully to the global SDGs, while fostering sustainable growth and corporate responsibility.

Sustainable Goals				
Pillar	Target Type	Description	Target Year	2023 Performance
Environment	Net – Zero Target	Net – zero emissions across the value chain	2040	Ongoing
	Scope 1& 2 Near Term Targets	Reduce absolute 1 and 2 GHG emissions by 90% from 2020 base year	2030	Ongoing
	Green Energy Sourcing	Maintain the annual sourcing of 100% renewable electricity in our direct consumption	Annual	Ongoing Achieved in 2023
	Zero Waste in Operations	Achieve Zero waste in Operations, optimizing resource use, promoting recycling initiatives	2030	Ongoing
	Zero Waste in landfills	Divert 100% of our generated waste from the landfill	2030	Ongoing 92% in 2023
	Target Type	**Description**	**Target Year**	**2023 Performance**
Social	Gender Equality in Leadership	Achieve a representation of 40% Women in Managerial Positions	2030	Ongoing 25% in 2023
	Progressive Reduction of Gender Pay Disparity	Continuously reducing the median gender pay gap	Annual	Ongoing
	Mitigating Unconscious Bias	Ensure that all managers undergo training in recognizing unconscious bias and adopting inclusive recruitment practices	2026	Ongoing
	Enhance Employee Development	Achieve an average of 25 learning hours per employee annually	2030	Ongoing 4.86 training hours per employee in 2023
	Target Type	**Description**	**Target Year**	**2023 Performance**
Governance	Compliance Management System	Maintaining a Compliance Management System aligned with international best practices and securing external certification ensuring proactive adherence to evolving regulatory standards	Annual	Achieved

7 AFFORDABLE AND
CLEAN ENERGY

11 SUSTAINABLE CITIES
AND COMMUNITIES

12 RESPONSIBLE
CONSUMPTION
AND PRODUCTION

13 CLIMATE
ACTION

55%
reduction in Scope 1 & 2 emissions

74 %
electricity coverage from renewable energy sources

3
Main pillars in reduction of energy consumption

91.63%
of the total waste was diverted from disposal

WE   CARE   FOR   THE
ENVIRONMENT

At Nova, we are committed to acting responsibly towards the environment by adhering to all relevant legislation and continuously enhancing our practices. Simultaneously, we prioritize keeping our employees well-informed on matters of environmental protection, reflecting our dedication to sustainable and responsible operations.

5.1 Our environmental approach

Environmental sustainability is a core value that guides our actions and decisions. We are dedicated to minimizing our environmental footprint, conserving natural resources, and promoting biodiversity conservation.

Nova is committed to integrating sustainability across its value chain, thus contributing to addressing environmental challenges such as climate change and overconsumption of natural resources.

In this context, our strategic priorities that are aligned with United Group taking into consideration the materiality analysis results, are: Climate Neutrality, Circular Economy and promoting sustainable practices throughout our operations.

In order to achieve those priorities, we are committed to:

- Analyze environmental risks and opportunities.
- Monitor environmental performance in a timely and transparent manner.
- Optimize the energy use in our buildings
- Proceed with renewable energy procurement
- Aware our stakeholders in proper environmental management

5.2 Energy Management and GHG Emissions

Electricity and thermal energy consumption

Energy management and the reduction of greenhouse gas (GHG) emissions remain critical priorities for Nova, reflecting its commitment to sustainability and environmental responsibility. As the telecommunications industry evolves, the rational use of energy resources becomes increasingly crucial to mitigating climate impacts and fostering long-term operational resilience. The Company is dedicated to integrating energy-efficient practices across all aspects of its infrastructure while pursuing decarbonization strategies in alignment with global and national environmental goals.

Nova implements comprehensive environmental management systems, certified under ISO 14001, which ensure that all operations and their facilities are managed in a way that reduces environmental impacts. Additionally, the Company invests in infrastructure for critical power equipment and comfort systems through the upgrade of electromechanical systems with newer, more efficient technology. These initiatives are part of Nova's broader efforts to align with the Paris Agreement's climate targets, reinforcing its leadership in creating a more sustainable and forward-thinking telecommunications sector in Greece. Through these efforts, the company strengthens its commitment to delivering innovative and responsible telecommunications services, contributing to a greener future for Greece and beyond.

The total energy consumed by the Company in 2023, was 140,186.38 MWh, consisted of 90% electricity and 10% of thermal energy.

Total energy consumption (MWh)

■ 2022 ■ 2023
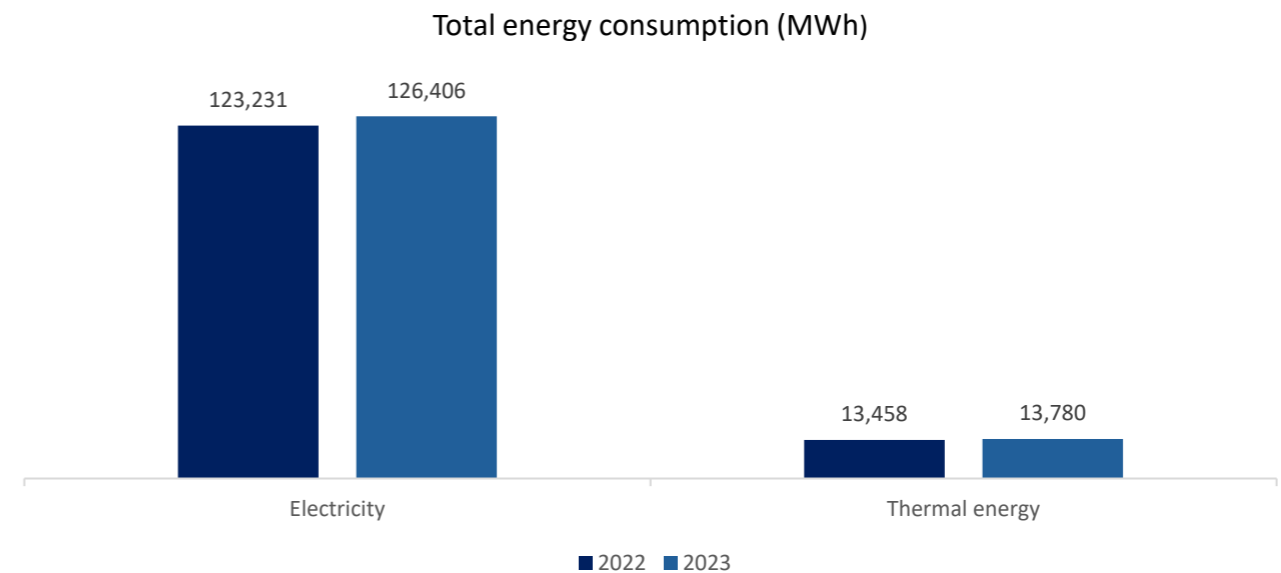
Electricity was sourced from the national grid and Nova secured high-quality Guarantees of Origin (GOs) from its electricity providers, assuring 100% coverage from renewable energy sources for electricity consumption at all sites with under Nova's full operational control. In terms of total electricity consumption, this corresponds to 74%. The total electricity consumption for 2023 amounted to 126,406.25 MWh, presenting a 2.5% increase due to the network expansion compared to the previous year (123,231.25 MWh, 2022).

In 2023, the Company's total fuel consumption reached 1,392,596 liters. A significant portion, amounting to 77%, was associated with the operation of backup power generators and a small number of sites that lack access to the electricity grid. Petrol represented only 5% of the total fossil fuel usage, largely due to the ongoing effort by Nova to transition the corporate vehicle fleet to more sustainable options, including electric vehicles (EV), plug-in hybrids (PHEV), and mild hybrids. This initiative, launched in 2021, has already resulted in the replacement of 86 vehicles (4 in 2023). Nova plans to continue this transition by replacing expiring leased vehicles with EVs, PHEVs, or mild hybrids, targeting an additional 40 vehicles. Once these replacements are complete, 30% of the Company's fleet will consist of vehicles utilizing electric, plug-in, or hybrid technologies.

Fuel consumption (L)

Litres (L)
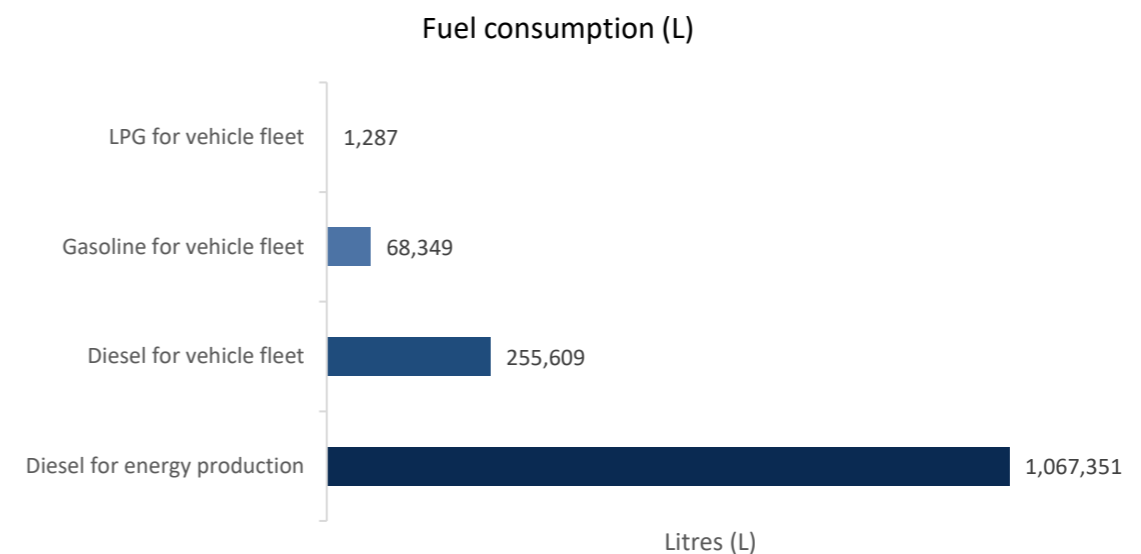
Energy consumption reduction initiatives

Nova has implemented a series of initiatives aimed at reducing energy consumption and enhancing operational efficiency. These include optimizing facilities by modifying building programs to better align with the needs of employees and equipment, resulting in more efficient use of resources. Additionally, the company has consolidated its Data Center (DC) equipment sites as part of an upgrade plan, significantly reducing the amount of installed equipment at third-party provider sites through physical co-location consolidation.

To further enhance energy efficiency, Nova has invested in infrastructure improvements, including upgrading critical power and comfort systems with water-based HVAC technology that offers better efficiency. The installation of energy meters in Data Centers ensures accurate monitoring and recording of energy consumption, supporting the company's broader renovation projects and its SY plan.

GHG Emission

The Company demonstrates its strong commitment to sustainable development by meticulously measuring and managing its CO_2 emissions across all three scopes. Scope 1, covering direct emissions, focuses on reducing the carbon footprint from vehicle fleet and diesel generators. Scope 2 addresses the emissions from purchased electricity, with Nova accelerating its transition to low-emission energy sources while continuously enhancing energy efficiency.

In addition, Nova's value chain emissions, classified under scope 3, include indirect emissions from activities such as fuel and energy-related processes not captured in scope 1 or scope 2, as well as business travel, employee commuting, and emissions from franchise stores. For 2023, Nova proceeded with the calculation of Categories 1-8 and 11-14 for scope 3 emissions. Categories 9 and 15 are not relevant for our scope.

Nova actively contributes to United Group's goal of achieving net zero operations. Specifically, the company is committed to reducing its emissions by 90% (scope 1 and 2) by 2030, strengthening its efforts toward sustainable development and playing a crucial role in addressing climate change.

Greenhouse Gas Emissions (tn CO_2 eq)

Greenhouse Gas Emissions (tn CO_2 eq)*			
	Scope 1	Scope 2	Scope 3
2023	4,465	5,573*	66,950
2022	4,021	18,401	N/A

* The scope 1 emissions have been calculated using the emission factors from Defra (2023) and the scope 2 using emission factors from the most recent IEA (2022).
**The scope 2 refers to market-based approach. For the location-based approach the scope 2 emission in 2023 are 35,744 tn CO_2 eq.

Greenhouse Gas Emissions (tn CO_2,eq) / employee			
	Scope 1	Scope 2	Scope 3
2023	3.26	4.06	48.83
2022	2.76	12.63	N/A
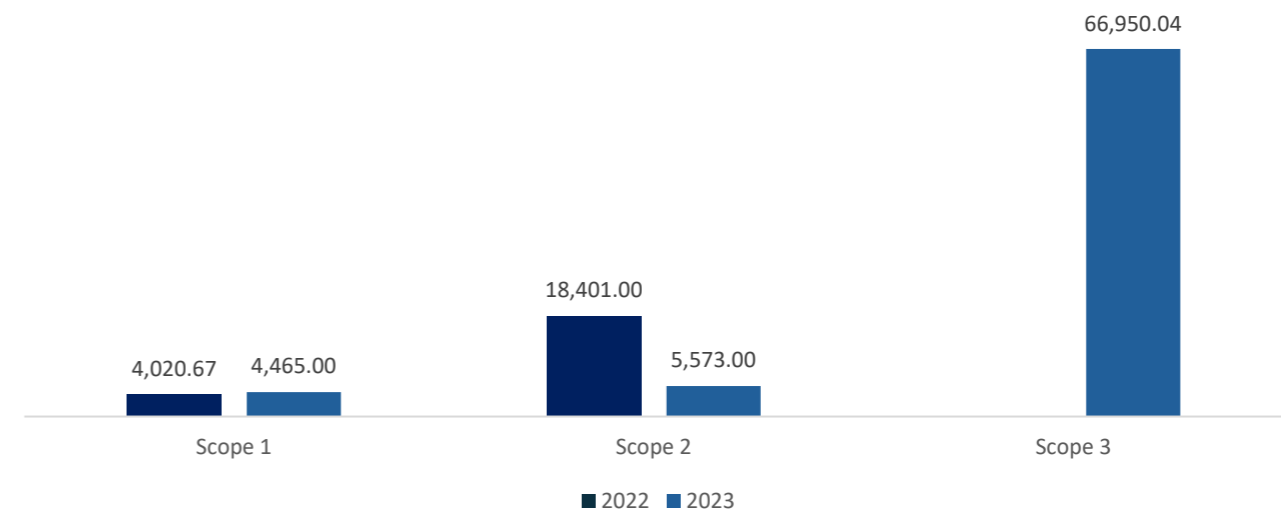
5.3 Progress to Net Zero

Nova, as part of United Group, is committed to following the same science-based decarbonization goals and aligning with United Group's Net Zero Strategy. United Group has set ambitious near-term and long-term targets for reducing greenhouse gas emissions and achieving net-zero greenhouse gas emissions by 2040. These targets are validated by the Science Based Targets initiative (SBTi) and are meant to drive meaningful reductions across United Group's value chain, which includes its subsidiaries.

United Group's validated Science-based Targets

01 Reaching net-zero greenhouse gas emissions across the value chain by 2040

02 Reducing absolute scope 1 and 2 GHG emissions 90% by 2030 from a 2020 base year

03 Reducing scope 3 GHG emissions covering purchased goods and services, capital goods, fuel- and energy-related activities and business travel 40% by 2030 from a 2022 base year

04 Maintaining at least 90% absolute scope 1 and 2 emission reductions from 2030 to 2040, using the 2020 base year

05 Reducing absolute scope 3 GHG emissions covering purchased goods and services, capital goods and fuel and energy-related activities 90% by 2040 from a 2022 base year.

United Group in order to complement its SBTi targets, sets also renewable electricity and supplier engagement targets:

- ✓ Increase active annual sourcing of renewable electricity 100% by 2027 and to continue active annual procurement of 100% renewable electricity
- ✓ Having 50% of our suppliers by spend to have committed to SBTi validated carbon reduction targets by 2030.

Nova will implement actions to contribute to United Group's net-zero strategy through the following key areas:

Energy Efficiency Measures

Nova will focus on optimizing energy consumption across its offices, data centers, and operational facilities by integrating advanced energy management systems and upgrading its infrastructure with energy-efficient technologies, such as LED lighting and improved HVAC systems.

Transition to Renewable Energy

Nova will actively work towards increasing the share of renewable energy in its electricity consumption, aligning with United Group's goal of sourcing 100% renewable electricity by 2027. This will include renewable energy procurement and exploring local renewable energy projects.

Supplier Engagement and Sustainability

Nova will encourage its suppliers to align with sustainability goals, supporting UG's target of having 50% of suppliers commit to SBTi-approved carbon reduction targets by 2030. This will help Nova extend its environmental impact beyond its direct operations.

E-Waste Management and Circular Economy

Nova will enhance its circular economy initiatives by focusing on the responsible management of electronic waste (e-waste). This includes the promotion of trade-in programs for customer devices, refurbishing equipment, and providing e-waste collection points at its retail locations.

Innovation in Telecommunications

Nova will leverage its role in the telecommunications sector to support sustainability innovations, such as the deployment of energy-efficient 5G networks, smart metering, and solutions for smart cities that reduce overall energy consumption and carbon emissions.

Local Partnerships for Environmental and Social Impact

Nova will engage with local organizations and communities to foster partnerships that contribute to environmental protection and resource efficiency, following United Group's broader sustainability framework.

These efforts will ensure that Nova, as a key subsidiary of United Group, not only contributes to United G's net-zero goals but also plays a leadership role in promoting sustainability across Greece's telecommunications sector. This alignment will help Nova deliver on its commitment to reduce its environmental impact, enhance operational efficiency, and support the global transition to a low-carbon economy.

5.4 Waste Management & Circular Economy

Nova places a strong emphasis on responsible waste management and actively integrates circular economy principles into its operations. Our approach focuses on reducing hazardous and non-hazardous waste, promoting recycling, and optimizing the reuse of materials to minimize environmental impact.

In 2023, Nova generated 188.3tn of hazardous and non-hazardous waste that was successfully diverted from landfills through recycling, reuse, or other recovery methods; and 16.1 tonnes of other waste types (mixed municipal waste, non-recyclable materials) were sent to landfills. Nova aims to further reduce the amount of waste going to landfills and increase the percentage of materials recycled.

5.4.1 Hazardous and Non-Hazardous Waste Management

Nova actively manages various waste streams, ensuring compliance with environmental regulations and supporting circular economy goals. In 2023, specific waste categories managed included a wide range of hazardous and non-hazardous materials, reflecting the company's commitment to sustainable waste management practices.

The table below provides a breakdown of key waste categories managed by Nova, highlighting significant efforts in addressing both hazardous and non-hazardous waste:

	Batteries	98.86 tn
	Oils	4.8 tn
	Electronic equipment	36.4 tn
	Paper/Cardboard	11.24 tn
	Metal	2.18 tn
	Wood	31.24 tn
	Generator Filters	1.08 tn
	Textiles	2.52 tn

These efforts demonstrate Nova's comprehensive approach to waste management by addressing both hazardous and non-hazardous materials. Hazardous waste amounted to 140.06 tonnes, which includes significant quantities of batteries (96.86 tonnes),oils (4.8 tonnes) and electronic equipment (36.4). Non-hazardous waste totaled 64.36 tonnes, primarily consisting of wood (31.24 tonnes), paper/cardboard (11.24 tonnes), and metal (2.18 tonnes).

Nova ensures proper handling, recycling, or repurposing of these materials, contributing to its circular economy goals and minimizing the impact on the environment and human health

The charts below show the significant efforts by Nova in diverting waste from landfills, indicating a strong commitment to waste reduction. A total of 91.63% of waste was diverted from disposal and 8.37% of the waste was sent to landfill, emphasizing the need for continued efforts in waste reduction and recycling.

Distribution of Waste Management

8,37%

■ Waste Diverted From Disposal

■ Waste Sent to Landfill

91,63%
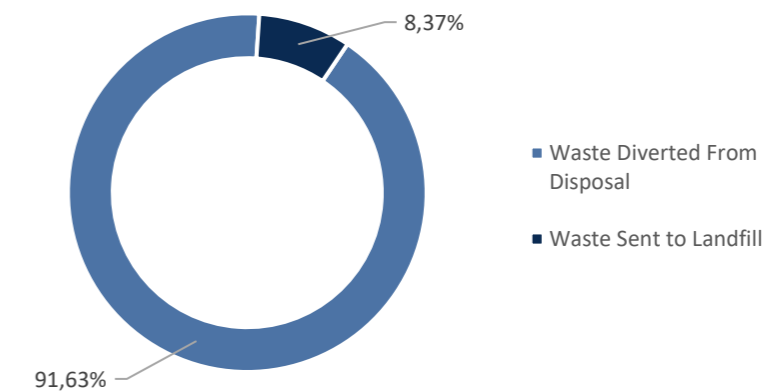
5.4.2 Recycling and Material Recovery

Nova actively manages waste generated from its operations through collection, separation, and recovery, prioritizing recycling and reuse wherever possible. When recycling or reuse is not feasible for technical reasons, non-hazardous waste is safely disposed of in landfills. Key waste categories include solid packaging materials (paper, wood, plastic), electrical and electronic equipment, batteries, and mixed municipal waste.

Additionally, Nova generates excavation, construction, and demolition (E&C) waste during network upgrades or dismantling old stations. This waste is managed through licensed recycling plants and collective management schemes. Nova collaborates with various recycling systems to meet its obligations as a responsible producer, ensuring proper disposal and recycling of waste. The company also engages the public and employees in recycling efforts by collecting mobile phones, batteries, and other household items through its stores and special schemes for appliances, batteries, light bulbs, and clothing.

Solid packaging waste

Waste electrical & electronic equipment

Batteries

Mixed waste

E.C.D.W.
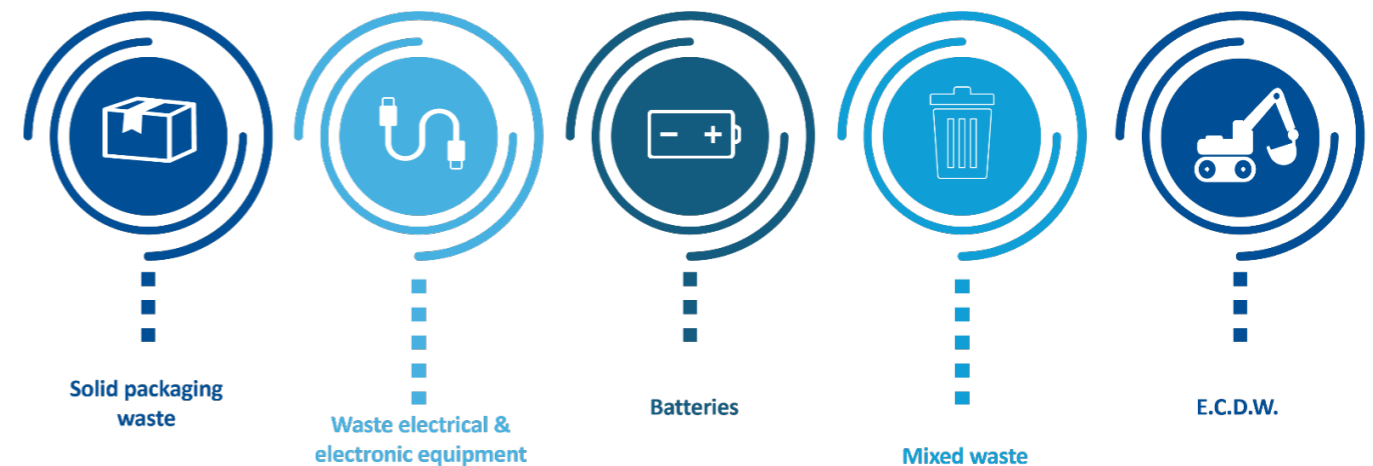
5.5 Electromagnetic Radiation

The Company continues to uphold a responsible approach in monitoring and measuring electromagnetic radiation levels, ensuring full compliance with both international safety standards and Greek legislation. During the installation, operation, and monitoring of its network, Nova strictly adheres to the guidelines set forth by regulatory bodies such as the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and the World Health Organization (WHO).

Mobile terminals, as well as customer premise equipment (CPE), comply with stringent radiation safety standards, including Specific Absorption Rate (SAR) limits, to minimize exposure to electromagnetic fields and prevent interference with other devices. In line with Nova's commitment to public safety, we continue to recommend that the public seeks information from reliable sources, including materials published by the WHO, the National Observatory for Electromagnetic Fields, and the Hellenic Atomic Energy Commission (EEAE), which regularly conducts radiation measurements at communication stations and other key locations.

As 5G technology is further deployed, Nova addresses public concerns regarding non-ionizing radiation, reaffirming that numerous scientific studies have shown that radiation levels remain well below safety thresholds. The WHO and other global health organizations consistently confirm that no adverse health effects have been linked to exposure from low-level electromagnetic fields, further supporting the safety of our network operations.

5.6 Environmental legislation

Nova operates in strict adherence to Greece's comprehensive environmental legislation, ensuring that all activities comply with both national and EU regulatory frameworks. As part of its commitment to sustainability, Nova integrates environmental compliance into its operational strategy, managing its environmental footprint in line with the latest legal standards. This includes regulations related to emissions, waste management, and resource efficiency, which are essential for reducing the environmental impact of its operations.

Aligned with United Group's approach, Nova holds certifications under internationally recognized standards such as ISO 14001 and ISO 50001, which reflects its dedication to maintaining high environmental management standards. The company continuously monitors its compliance, actively participating in policy dialogues and staying updated on new environmental legislation.

By treating regulatory compliance as a core element of its sustainability efforts, Nova not only mitigates environmental risks but also contributes to the broader sustainability goals of the telecommunications sector in Greece and across the EU.

39 %

Women employees

234

New employee hires

0

Work related injuries

4.86

Training hours per employee

0

Fatality rate & Recordable work-related ill health for all employees

96.4%

Percentage of complaints resolved within 10 days

WE INVEST IN PEOPLE

6.1 Human Resources

Nova places great emphasis on creating safe and modern working conditions for all employees, ensuring the development of their skills and professional growth. Continuous training and development of human resources remain key factors in the company's steady progress and success.

During the year, Nova strengthened its senior management teams by hiring 16 executives at significant locations of operation, while ensuring that all employees are covered by collective bargaining agreements. Specifically, 316 employees are covered by collective agreements, while the rest fall under the provisions of the National General Collective Labour Agreement (NGCLA).

A strong focus is placed on equality and inclusion, with no employees under non-guaranteed hour contracts and no gender-specific roles in such conditions. The recruitment of individuals with disabilities and the provision of the necessary tools to showcase their skills remain central to our corporate policy.

The company actively promotes diversity and equality in the workplace, prioritizing the prevention and immediate response to any incidents of discrimination. Every incident is recorded and addressed promptly, ensuring the maintenance of a healthy and productive working environment.

The protection of fundamental workplace rights is a non-negotiable principle for Nova, guaranteeing human dignity and fair treatment. Through its policies and measures, the company ensures stability and harmonious cooperation between employers and employees, contributing to its overall prosperity and growth.

More specifically, Nova for the year 2023 employed a total of 1,371 employees, of which 530 were women and 841 were men. It is worth noting that 234 new recruitments were made, strengthening the capacity of the existing workforce. In addition, the number of full-time and part-time employees was 1,359 and 12 respectively.

Full Time Employees

Female 528 — Male 831

Part Time Employees

Female 2 — Male 10

Employees by type of work

		Permanent employees	Temporary employees
	Male	831	10
	Female	528	2
	Total	1,359	12

6

Outsource - staff leasing

8

Non-employment contract in the company (freelancers)
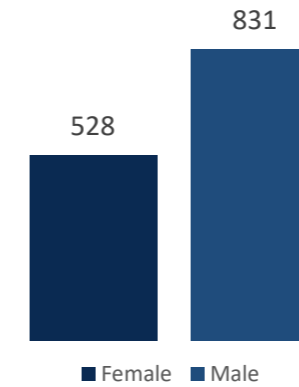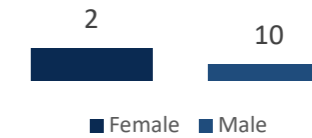
Employee hires by gender and age

		Under 30 years old	30-50 years old	Over 50 years old	Total
	Female employee hires	17	51	1	69
	Male employee hires	24	124	17	165
	Total	41	175	18	234

Employees that took parental leave in 2023

Female 56% — Male 44%
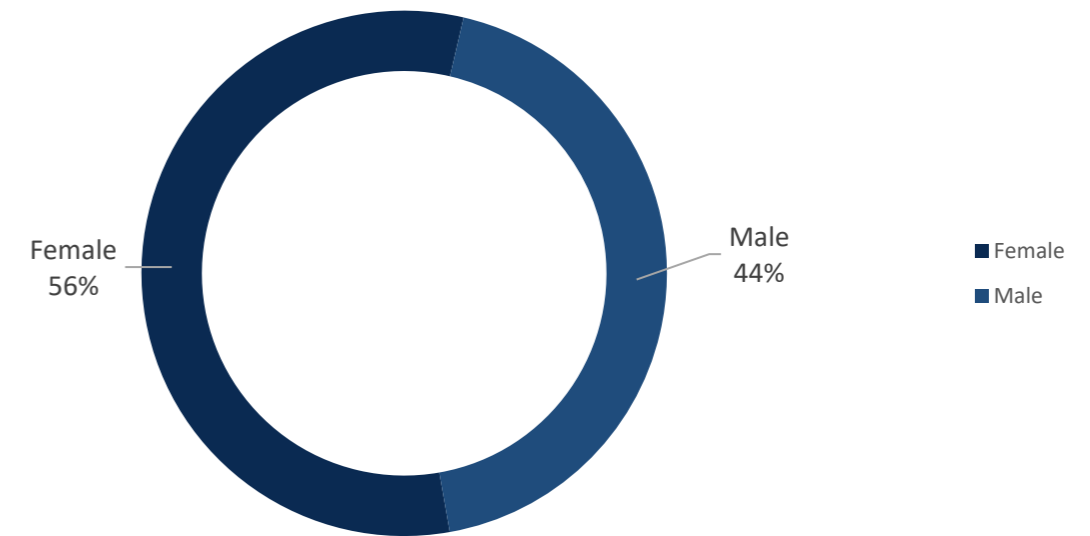
6.2 Labour Rights - Diversity and Equal Opportunities

Our company aims to stand out for its culture by providing equal opportunities for all employees, without any discrimination, and with absolute respect for the individuality of each person. Our goal is to create a work environment that not only embraces diversity but also promotes it as a fundamental element for the growth and well-being of all our employees.

At Nova, the respect and protection of internationally recognized human rights is our unwavering commitment. We ensure that our workforce does not include minors and that there are no cases of forced labor. We promote the creation of a work environment that recognizes and values diversity, with equal opportunities for all employees, without exclusion, and with full respect for each person's identity. We reaffirm our dedication to this goal through our Diversity and Inclusion Policy, introduced in 2021, and by signing the Diversity Charter, an initiative of the European Commission.

Upholding Ethical Standards: Promoting Equality, Safety, and Zero Tolerance for Discrimination

The content of the Code of Business Conduct and Ethics outlines general guidelines on the company's core principles and values, supporting human rights, equality, and acceptance of diversity. It reinforces zero tolerance towards violence and harassment, promotes health and safety, protects workers' labor rights, and ensures a mechanism for reporting unethical behavior. During the reporting period, there were zero incidents of discrimination (including harassment). This includes discrimination based on race, color, gender, religion, political opinion, national origin, social background, or other relevant forms of discrimination, as defined by the International Labour Organization (ILO).

Freedom of Association

We respect and protect employees' rights to organize and ensure the existence of information mechanisms. Our company adheres to collective labor agreements and aligns its operations with industry best practices to maintain a stable and fair working environment for all.

Actions for the wider social environment

At Nova, we prioritize our people by fostering an inclusive environment with equal opportunities for all, supported by our daily policies and corporate social responsibility efforts. We proudly signed the Diversity Charter, reflecting our commitment to diversity and inclusion. Women make up nearly half of our workforce and are vital to our success. Through the "Nova for Women" initiative, we empower our female employees and contribute positively to society. Additionally, our "Women In Tech" program strengthens women's roles in the tech industry and provides educational opportunities for women from vulnerable groups and remote areas.

Women's Empowerment Program

Nova recognizes the importance of diversity and the promotion of equal opportunities, embedding these principles into the core of its corporate culture. Through the **"Nova for Women"** initiative, the company is committed to supporting women in their professional journeys by providing opportunities for personal and professional growth. Nova has implemented practices that ensure equal opportunities for all employees, regardless of gender, age, ethnicity, or other characteristics, fostering an inclusive work environment where everyone feels valued and empowered to contribute meaningfully. Additionally, Nova invests in actions and programs aimed at empowering women, enhancing their participation in leadership roles, and supporting work-life balance. Through its initiatives, the company actively promotes gender equality and underscores its commitment to creating a sustainable and equitable workplace for all.

18.7%

Gender pay gap in average salaries between men and women

0

Incidents of discrimination

6.3 Health, safety and social benefits for employees

Nova is deeply committed to providing a safe and healthy working environment for all its employees, reflecting its dedication to responsible business practices. To ensure this, the company has established comprehensive processes and systems for promoting occupational health and safety, with a strong focus on continuous improvement.

Work-related incidents are thoroughly investigated by Nova's experienced consultants, including Safety Engineers and Occupational Physicians. This investigative process ensures that any occupational accidents are carefully reviewed, and appropriate corrective measures are implemented based on the findings to prevent future occurrences.

In terms of occupational health services, Nova complies with all relevant regulations. The Occupational Physician, while acting as a processor on behalf of the company, is strictly bound by medical confidentiality. Only the physician has access to employees' medical records, and the company is provided with fitness-for-work certificates or necessary health-related recommendations, such as absences from work when required.

Nova has voluntarily implemented an **Occupational Health & Safety Management System** that aligns with the internationally recognized **ISO 45001:2018** standard. This system is managed by the Safety Technician, the Occupational Physician, the Company's Health and Safety Team, and external partners for specialized needs, such as environmental factor measurements. The company identifies, analyzes, and assesses occupational risks, and prepares **Occupational Risk Assessment Studies** for each job. Alongside these studies, detailed safe working instructions are developed to minimize risks across all operations to enhance employee comfort and safety.

Nova also regularly monitors the quality of the working environment, conducting measurements of critical parameters such as dust levels, ventilation, lighting, volatile organic compounds, room temperature, humidity, drinking water quality, radiation, and noise. These ongoing assessments help ensure that the workplace remains safe and compliant with health standards. The company has also equipped its facilities with dispensaries and/or pharmacies to ensure quick access to medical assistance when needed.

To ensure compliance and address any emerging risks, Nova conducts regular inspections of its facilities and workplaces. These inspections help identify any non-conformities and new hazards in a timely manner, with the findings used to continuously improve the health and safety management system. Additionally, Nova maintains open communication channels, allowing employees to submit comments or suggestions for improvements at any time via email or verbally.

In terms of preparedness for emergencies, Nova maintains **Emergency Response Teams** at its facilities and conducts regular evacuation drills. These teams receive specialized training in firefighting, first aid, and emergency procedures, provided by experts from the Fire Service and the Safety Technician/Occupational Physician.

Employees are encouraged to actively participate in maintaining a safe workplace by reporting hazards or hazardous situations through a dedicated problem-reporting system, **Jira**, accessible to all staff. In addition, the Health and Safety Team, alongside the Safety Technician and Occupational Physician, conducts regular internal inspections of the facilities to proactively identify and address any risks.

To further enhance safety, Nova offers specialized training for employees, such as **Working at Height** training, ensuring that staff are well-equipped to perform their tasks safely and in line with industry's best practices.

By maintaining these rigorous health and safety measures, Nova demonstrates its ongoing commitment to protecting the well-being of its employees and fostering a workplace environment that prioritizes safety, continuous improvement, and proactive risk management.

0

Fatalities as a result of work-related injury for all employees

0

High-consequence work-related injuries for all employees

0

Fatalities as a result of work-related ill health for all employees

6.3.1 Employees Benefits

With employee satisfaction in mind, the company has a range of benefits that are presented below. For 2023 the schemes were implemented for all Nova employees.

NOVA for you

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

Benefits package

Competitive remuneration packages, both fixed and variable in order to contribute to a good working environment.

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

Nova's Flexy Work

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

NOVA friends & family

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

6.4 Employee Training

A key pillar of Nova's development and progress is the continuous training of its employees through training and skills enhancement programs. The purpose of attending the training programs is to keep employees up to date on all technological developments, to train them in their work subject and to continuously develop their skills. For 2023, the training hours amounted to 6,658.82 resulting 4,86 training hours per employee.

Training Hours

Female 42%

Male 58%

■ Male ■ Female
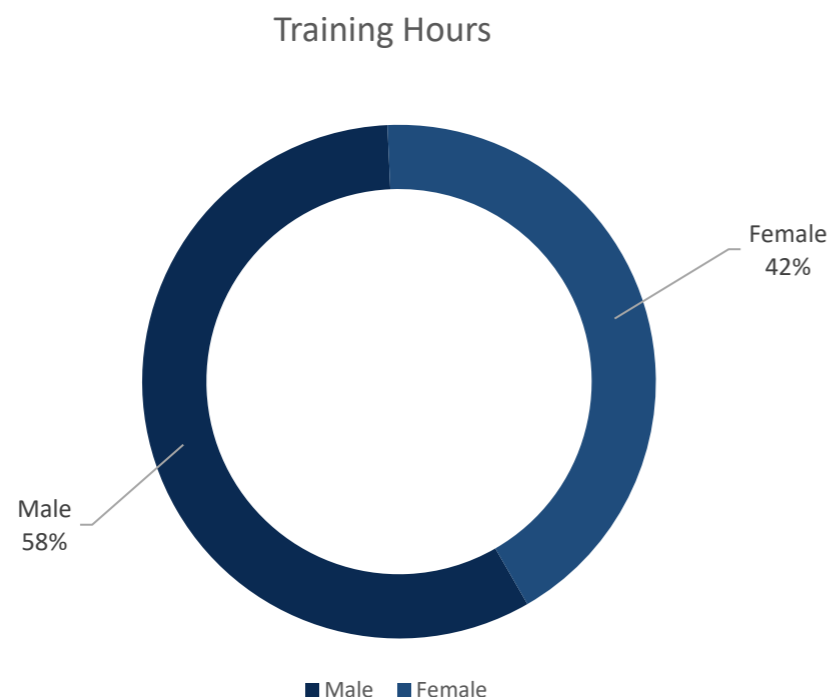
Nova's training on the Code of Conduct covered a broad spectrum of compliance topics, including but not limited to anti-bribery and anti-corruption measures, data privacy, conflict of interest management, and the prevention of violence and harassment. Throughout the year, all employees were trained in legal requirements, industry best practices, and the potential consequences of non-compliance. The training was delivered through an interactive learning experience that included case studies, simulations, and quizzes to actively engage participants and ensure a deeper understanding of the core principles of the Code.

In addition, supplementary training sessions were conducted on the Anti-Bribery and Corruption Policy to provide clear guidance on managing gifts, entertainment, travel, donations, sponsorships, and conflicts of interest. Employees were made aware of the necessity of obtaining approvals from the Local Compliance Officer for related requests to prevent any potential involvement of the company in bribery or corruption issues.

Category of training program	Training Hours
Code of conduct	1,258
#OneTeam Leaders sessions	872
Competition Law	241.5
Anti-Bribery & Anti-Corruption Training	151
Other trainings	4,136.32
Total	6,658.82

Sales Development Academy

Our Business Account Management team took part in a tailored training program designed to enhance their sales skills, focusing on building lasting relationships with our clients and fostering long-term customer engagement.

Compliance Initiatives

The Compliance Team at Nova navigated the complexities of the merger process with expertise and professionalism, ensuring seamless communication of the newly updated Compliance Policies. Key elements that supported the successful integration of the compliance culture included *Cultural Focus:* We took the opportunity to cultivate a unified "One Team" mindset, establishing a refreshed compliance culture centered on ethics, integrity, and personal accountability.

Advancements in 5G, CIoT, VoLTE & Other Emerging Technologies

In partnership with Mpirical, a globally renowned training provider in telecommunications, we launched a year-long digital training program aimed at expanding the technical knowledge and skills of our engineers and technicians. The focus was on 5G and other cutting-edge technologies like CIoT, VoLTE, GSM, GPRS, UMTS, LTE, Wi-Fi, and Packet Transport Networks.

Internal Talent Mobility

At Nova, we encourage our employees to seek career advancement across different departments within the company. When new roles arise, we prioritize internal candidates, recognizing them as our most valuable and qualified resource..

External Talent Acquisition

We actively participate in various career fairs and recruitment events, promoting the Nova brand as an employer of choice. These initiatives help us attract top talent and inform potential candidates about career and development opportunities within our organization.

Enhanced Internal Communication

We utilize the latest communication platforms to keep employees informed on matters that affect them. Our methods include employee surveys, workshops, meetings, and digital communication tools like the revamped NOVA Intranet and Microsoft Teams. We also create specialized microsites for internal use, designed to provide clear information and guidance on significant company events and updates.

Employee Feedback Mechanisms

We continue to use Employee Net Promoter Score (eNPS) surveys as a valuable tool for gathering targeted feedback. This helps us take action promptly by designing "quick win action plans" for teams to address identified areas for improvement.

Voluntary Blood Donation Program

One of our longest-standing community initiatives, our Employee Blood Bank program, has been running since 2002. This initiative is held twice a year, and in 2023, it supported 25 individuals—both employees and their family members—by providing 44 units of blood to meet their needs.

6.5 Customer Experience (Quality of Service)

6.5.1 Customer Experience Transformation

In 2023, Nova has taken significant strides in enhancing customer experience, focusing on innovation and responsiveness to meet the evolving needs of our customers. Our commitment to delivering high-quality service and fostering customer loyalty is evident through various strategic initiatives aimed at transforming the customer journey.
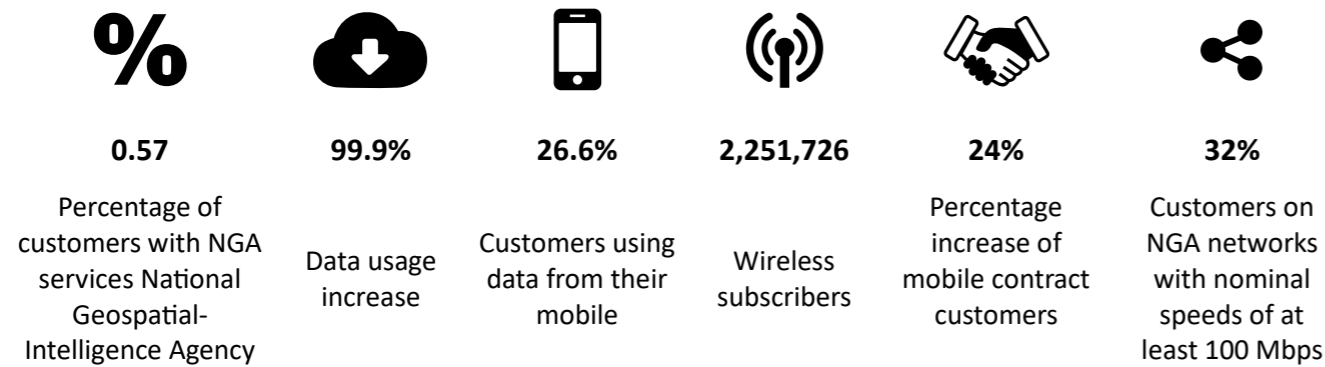
225	**+24%**	**62**	**5,032.39**
Total number of stores	Increase of customer base	Total number of products	Total number of mobile, fixed & pay-TV customers revenue generating units (RGUs)

6.5.2 Milestones

In mobile telephony

In 2023, Nova made significant strides in mobile telephony, solidifying its position as a rapidly growing provider. A major milestone was the successful integration of Nova with Wind Hellas, completed in January 2023. This merger created a unified entity, enhancing both mobile and fixed telephony services, with around 5 million subscribers and an extensive network of over 225 stores across Greece. Nova also focused on expanding its 5G network, introducing new affordable mobile plans, including 5G capabilities at competitive prices. One notable product was the launch of the budget-friendly Nova 5G smartphone, further driving growth in mobile subscribers

Additionally, Nova rolled out new mobile telephony plans offering unlimited calls, SMS, and data packages, catering to both individual and household needs. These offerings were designed to provide high-speed connectivity with options for 2GB and 10GB data packages, while leveraging NOVA's upgraded 5G network for enhanced customer experience.

0.57	**99.9%**	**26.6%**	**2,251,726**	**24%**	**32%**
Percentage of customers with NGA services National Geospatial-Intelligence Agency	Data usage increase	Customers using data from their mobile	Wireless subscribers	Percentage increase of mobile contract customers	Customers on NGA networks with nominal speeds of at least 100 Mbps

On fixed telephony and the Internet

In 2023, Nova continued its focus on enhancing broadband internet and fixed telephony offerings. It launched initiatives to improve satellite internet services, increasing speeds to 25Mbps for downloads and 6Mbps for uploads, which significantly improved user experience for customers in remote areas.

Furthermore, Nova is rapidly expanding its 10 Gigabit fiber optic infrastructure, aiming to cover 40% of the Greek population. This initiative underscores its commitment to Greece's digital transformation, enabling faster and more reliable connections for both residential and business users. This enhanced digital infrastructure plays a crucial role in making Greece more competitive within the EU.

135,499	**8 major incidents**	**1,170,667**	**1,177,704**
Number of fixed line customers interconnected to United's proprietary FTTx network	Technology disruptions	Broadband subscribers	Wireline subscribers

In pay-TV

Nova's Pay TV services are available throughout Greece, designed to cater to the entire territory by offering both satellite and streaming options through the advanced EON OTT platform. This platform is accessible on various devices, including Android Box, Smart TVs, streaming devices, PCs, laptops, tablets, and smartphones, ensuring maximum convenience for customers.

EON provides an engaging and personalized viewing experience, offering both Live TV and On-Demand content. Through advanced profiling features, the platform recommends content tailored to each user's preferences. The 7-day Catch-up feature allows users to track and access shows they might have missed. For children, the EON Kids service creates a safe and enjoyable environment, offering a vast selection of curated content for younger audiences.

Sports enthusiasts benefit from the exclusive EON Sports Mode, which delivers live match results, team line-ups, player statistics, and ratings for top football, basketball, and tennis competitions, creating an immersive and interactive sports viewing experience.

Nova's TV packages are designed with simplicity in mind, making it easy for customers to choose the plan that best suits their interests, preferences, and budget.

In 2023 (1/1-31/12), Nova's Wi-Fi Calling service enabled 11,875,782 mobile customer calls, demonstrating the company's commitment to providing seamless connectivity even in areas with limited cellular coverage. This innovative service ensures that customers can stay connected, leveraging Wi-Fi networks to enhance communication reliability and quality.

…Wi-Fi Calling, Pay Your Bill via Link

At Nova, enhancing customer experience through innovative digital services is a top priority, aiming to simplify daily interactions and provide seamless connectivity solutions.

In 2023 (1/1-31/12), Nova's Wi-Fi Calling service enabled 11,875,782 mobile customer calls, demonstrating the company's commitment to providing seamless connectivity even in areas with limited cellular coverage. This innovative service ensures that customers can stay connected, leveraging Wi-Fi networks to enhance communication reliability and quality.

Additionally, Nova introduced a convenient payment option through the "Pay Your Bill via Link" service, which gained significant traction throughout the year. A total of 4,602,957 customers utilized this service, streamlining the payment process and improving overall customer experience. Out of these, 1,270,488 customers chose to pay their bills anonymously, while 3,332,469 customers completed their payments by logging into their accounts. These figures highlight Nova's dedication to offering user-friendly digital solutions that cater to diverse customer preferences and needs.

6.5.3 Promoting Sustainable Development – Innovation & Digital Transformation

Nova has been a key player in Greece's digital transformation, advancing the development of innovative technological solutions for smart cities. Through substantial investments in information and communication technologies (ICT), the company has enabled the creation of a comprehensive range of digital services and applications aimed at enhancing the daily lives of citizens.

In 2023, Nova significantly expanded its fiber optic network under United Fiber, investing over €38 million. This investment has accelerated Greece's transition to high-speed internet, offering enhanced connectivity that benefits both individuals and businesses. By the end of 2023, United Fiber had passed 40,129 buildings and connected 246,643 homes to its network, marking a significant milestone in the country's digital infrastructure development.

The fiber optic network expansion was strategically distributed across Greece, with 53.5% of the infrastructure concentrated in the Attica region, 22% in Thessaloniki, 12% in the Peloponnese, 7.5% in Thessaly, and 5% in Crete. This broad allocation highlights NOVA-Wind's commitment to providing high-speed internet access in both urban centers and regional areas, contributing to Greece's digital modernization and socio-economic development.

In addition to enhancing connectivity for individuals, Nova has played a pivotal role in modernizing the public sector and local government, supporting initiatives that streamline public services and improve governance processes. The company's investment in smart city technologies and fiber optics underscores its commitment to addressing modern urban challenges, ultimately contributing to broader social and economic progress across Greece.

40,129
Buildings passed

€ 38M
Invested in network expansion

246,643
Homes passed

6.5.4 Responsible mobile services

Protection of minors

We are committed to strictly adhering to regulations that protect minors when accessing multimedia information services via mobile phones. For our 901 and 909 lines, as well as five-digit SMS services, account holders (adults) can request a blocking feature through a telephone or written communication, ensuring responsible usage.

Responsible marketing

Our marketing programs comply with relevant regulations and voluntary codes designed to inform consumers thoroughly about the benefits of our products and services. We ensure that all communication and promotional materials align with the provisions of the Greek Advertising and Communications Code (HCC-CC), laws regarding unfair competition, consumer protection, and broader Greek legislation. Additionally, we strictly follow the guidelines set by the Communication Control Board (CCB) to maintain high standards of ethical marketing.

Principles of Communication

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

Immediacy

We remain committed to investing in a robust communication strategy, utilizing multiple channels to distribute our products and opting for direct and transparent promotional methods. In addition, we continue to strengthen our online presence, ensuring a seamless and unified digital experience for all users, regardless of the platform or medium they use.

Training of our partners

We have developed comprehensive, modern training programs and procedures for both the sales teams and partners across the Nova franchise network in Greece, as well as our partners in Customer Service Call Centers. Our primary aim is to deliver an exceptional customer experience through all interaction channels with our subscribers.

Responsibility

We ensure that our products and services are communicated with clarity and transparency across all promotional channels. Websites and mobile apps serve as essential platforms for both service delivery and consumer communication, streamlining the process of accessing our offerings and making it faster and more straightforward. Acknowledging the right to equal access to NOVA services, we have integrated a widget on our websites that offers accessibility features for individuals with visual, hearing, and cognitive impairments. To further guarantee that the information we provide is accurate, understandable, and clear, we regularly conduct both qualitative and quantitative surveys, ensuring that our communication resonates effectively with the public.

Honesty

We ensure that all our communications adhere to the principles of fair competition and are fully compliant with the Greek Advertising and Communication Code. Our aim is to build and maintain strong, trust-based relationships with both current and potential subscribers. To achieve this, we invest in communication campaigns that resonate with the public, present information transparently, and strictly adhere to the guidelines set forth by the Advertising Code, ensuring ethical and responsible communication practices.

These training programs cover the essential knowledge and actions required for each channel and equip Nova representatives with the skills necessary to excel in customer service. By combining various training methods, we ensure optimal results in building capabilities that enhance customer interactions and satisfaction across the board.

6.5.5 Responsible procurement practices

Our relationships with suppliers are built on professionalism and a strict adherence to established procedures that ensure the reliability and ethical standards of our partners. We utilize structured forms, clear terms of cooperation, and dedicated processes, expecting all suppliers seeking to collaborate with our company to comply fully with national and European legislation. Additionally, we require them to maintain fair and ethical business practices.

To protect the integrity of our procurement processes, we prioritize transparency and actively work to prevent any forms of corruption. The selection, evaluation, tendering, and daily procurement activities are carried out through documented, formal procedures that respect human rights and promote transparency. These processes involve specific measures, controls, and approvals to ensure compliance with our rigorous standards.

Evaluation of suppliers

We are committed to continuously improving the efficiency and effectiveness of our supply chain by enhancing the quality characteristics of our supplier base. We evaluate our critical and larger suppliers, taking necessary actions when required. Since 2022, to promote Corporate Responsibility within our supply chain, we have begun sending our new "Supplier and Partner Code of Conduct" to all new suppliers, making acceptance of this Code a prerequisite for cooperation. Acceptance of the General Terms and Conditions of Supply, the Confidentiality Agreement, and the completion of business-related questionnaires are fundamental requirements for any new supplier wishing to join our database. Due to the merger in 2022, we did not carry out an evaluation of our suppliers; however, we aim to complete this evaluation in 2024.

Strengthening the local community

We are dedicated to enhancing local markets, particularly in contracting and construction, by prioritizing the use of local companies whenever feasible. In addition, we predominantly engage Greek companies for our purchases of promotional materials and printing services.

Responsible network development

Nova is committed to making substantial investments in infrastructure and network development, with a focus on responsibility and sensitivity towards public health and the environment. Our business strategy aims to contribute to the digital transformation of Greece, ensuring that digital access is a reality for individuals in remote areas and promoting equal participation in the digital future.

6.6 Quality of Service

In alignment with its commitment to transparency and consumer protection, NOVA has introduced new service quality indicators, as outlined by a decision of the National Telecommunications and Posts Commission (EETT Decision No. 991-7B-17.05.2021, Official Gazette 2394-B-07.06.2021).

This EETT decision defines a Quality Indicator as a measure of specific attributes used to assess aspects of the quality of provided electronic communications services. These indicators enable end users to compare service quality among different telecommunications providers and verify, to the extent possible, the quality of services they are receiving.

The tables below summarize Key Performance Indicators for 2023:

Key Performance Indicators on Orders & Information and Faults (Commercial and Individual/Private Customers)		
	Orders & Information	Faults
Number of calls	3,710,805	1,994,103
Percentage of unanswered calls (%)	3.27	5.6
Response time (50th percentile) (seconds)	97.13	95.5
Response time (95th percentile) (seconds)	290.75	418.5
Percentage of calls answered within 60'' (%)	79.1	73.29

Key Performance Indicators on Complaints		
96.4	0.6	5.1
Percentage of complaints resolved within 10 days	Time to resolve complaints (50th percentile) (calendar days)	Time to resolve complaints (95th percentile) (calendar days)

Key Performance Indicators on Phone Book Information			
10.0	5.5	26.0	88.7
Average response time (seconds)	Response time (50th percentile) (seconds)	Response time (95th percentile) (seconds)	Percentage of calls answered within 20 seconds

In terms of quality of service and customer satisfaction, NOVA has actively worked to enhance its services by upgrading legacy infrastructure and providing free SIM card replacements for customers needing access to 4G+ and 5G networks. Additionally, NOVA has introduced a pilot program aimed at improving customer experience, which focuses on network optimization, social media engagement, and direct customer feedback to meet evolving service needs.

6.7 Contributing to society

6.7.1 Society

Nova for Inclusion

In a unified effort to support the vital work of Shedia and facilitate the reintegration of homeless and socially excluded individuals, Nova's employees volunteered in a "raft art" workshop, crafting Easter creations whose proceeds will directly benefit the social work of Shedia. Moreover, Nova has made Shedia's magazine available to its employees, aiming to raise awareness and mobilize support around the issues of homelessness and social exclusion. Shedia serves as a beacon of hope, offering a means of liberation from the cycle of social isolation and exclusion. It provides individuals experiencing extreme poverty with the opportunity to rebuild their lives and secure a minimum income with dignity. In addition to these efforts, Nova supplied beverages as part of the "A Coffee Waiting for You" program, ensuring that people in need in Greece have access to a warm beverage, even if they cannot afford to purchase one.

Supporting Turkey and Syria After the Earthquakes

In 2023, we expressed our solidarity with the people of Turkey and Syria, who were affected by devastating earthquakes. Our thoughts were with the victims and their families, and we conveyed our deepest sympathy to those impacted by the disaster.

In response to the crisis, we provided our contract subscribers with 1,000 free international calling minutes to Turkey and Syria from the announcement date until February 15. Additionally, we eliminated roaming charges for our subscribers in Turkey, allowing them to stay connected with their loved ones during this challenging time.

Supporting the Street Work teams of the Reception and Solidarity Centre of the Municipality of Athens

The communication and connectivity of the Street Work teams were strengthened for yet another by Nova's donation of free telecommunications services for their interventions on-site. The teams map the city's homeless to record their needs and build relationships of trust in order to promote their transition to a homeless shelter. The Street Work on-site interventions are carried out by interdisciplinary teams consisting of social workers, psychologists, and a psychiatrist.

Supporting Communities Affected by Extreme Weather in 2023

In 2023, Nova, part of the United Group and a leading telecommunications provider in Southeastern Europe, recognized the urgent communication needs in areas affected by extreme weather events across regions such as Magnesia, Larissa, Karditsa, Trikala, and Northern Evia. To support its subscribers, the company announced the following assistance:

- 1,500 minutes of calls to all national mobile and landline numbers.
- Unlimited data (GB).

This support was available to both contract and prepaid subscribers, including individuals and businesses. The assistance was activated during two periods: from September 8 to September 22 and again from September 29 to October 13, with subscribers notified via SMS.

In addition, Nova suspended blocking actions for incoming and outgoing calls in the affected areas. The National Network Management Center monitored these regions 24/7 to address any technical issues promptly. Nova's technicians collaborated closely with local authorities and Civil Protection to restore network operations as quickly as possible.

Celebrating Olympic Excellence at the Hellenic Olympic Committee Awards

In 2023, we were proud to serve as the Golden Communication Sponsor at the annual award ceremony of the Hellenic Olympic Committee. This event took place on January 17, honoring athletes who have elevated the Greek flag and inspired fans with their remarkable achievements.

During this prestigious ceremony, we presented the Nova Ethics Award, established to recognize an athlete's contribution to Greek sports and the Olympic ideal. The award was presented by Ms. Kiki Silvestriadou, CEO of Nova Media, to Miltiadis Tentoglou, the gold Olympic champion in long jump, celebrating his exceptional sportsmanship and dedication.

6.7.2 Technology

Providing Health Services and Connectivity to Remote Islands

In 2023, we at Nova, a member of the United Group, provided free technological equipment and data to the voluntary mission of SYMPLYFSI. Our team of 80 volunteers traveled for 11 days, covering 375 nautical miles with 12 inflatable boats to visit 8 remote islands. The mission aimed to offer free medical examinations and health services.

With the continuous expansion of our Nova 4G+ and 5G networks, we ensured complete communication coverage for the islands of Sikinos, Donousa, Arkioi, Lipsi, Agathonisi, Thymaina, Fournoi, and Ikaria. This initiative included more than 20 medical specialties, offering laboratory hematological and biochemical tests, as well as diagnostic services in fields such as gynecology, cardiology, and ophthalmology.

6.7.3 Environment

Addressing Communication Needs in Wildfire-Affected Areas in 2023

In 2023, we demonstrated our commitment to supporting communities affected by devastating wildfires through a comprehensive communication assistance program. Recognizing the urgent needs in various regions, Nova provided its subscribers with essential services, including 1,500 minutes of free calls to all national mobile and landline networks and unlimited data.

The initiative was implemented in several impacted areas, including:

- **East Attica** (e.g., Keratea, Markopoulo, Anavyssos, Kalyvia Thorikou, Saronida), **Loutraki** in Korinthia, **Dervenochoria** in Viotia, **West Attica** (Mandra), **Agioi Theodoroi** in Korinthia, and **Nea Peramos**. This offer was available for 15 days starting from July 31 .
- **Rhodes**, specifically in locations such as Archangelos, Gennadi, Theotokos, Kalathos, Kallithea, Kiotari, Lardos, Peukoi, and Pylona, where subscribers received similar support until August 5 .
- **Corfu**, **Aigio** (Achaia), **Karystos** (Evia), and additional areas in Rhodes were included until August 8, ensuring coverage for both contract and prepaid subscribers.
- **Fthiotida** and **Magnesia** saw subscribers receiving this assistance until August 10 .

Moreover, Nova extended its support to the regions of **Evros**, **Rodopi**, and various locations in **Attica**, providing the same benefits for a substantial amount of time.

Through these initiatives, Nova not only addressed the communication needs of those affected by the wildfires but also showcased its dedication to community resilience and support during challenging times.

Collaborating with Aegean Rebreath for a Cleaner Aegean Sea

In 2023, we remained committed to being a genuine social partner by announcing our collaboration with Aegean Rebreath on the occasion of World Environment Day. Our efforts focused on protecting the marine ecosystem and addressing the urgent issue of marine pollution in the Aegean Sea.

Recognizing the severe impact of waste disposal in the sea, we partnered with Aegean Rebreath to implement targeted cleanup actions in Gytheio and Monemvasia in June, followed by activities in Amorgos in September and Corfu in October. Our goal was to clean the seabed and revitalize the seas and coasts.

Supporting Remote Medical Missions with Technology: Nova's Contribution to SYMPLEYSIS

Nova, in its commitment to advancing healthcare accessibility, offered free technological equipment and data support to the volunteer mission of SYMPLEYSIS. This initiative, comprising 80 dedicated volunteers, embarked on a remarkable journey covering 375 nautical miles over 11 days, reaching 8 remote islands to provide free medical examinations. As part of Nova's continuous efforts to expand its 4G+ and 5G networks across mainland Greece and island regions of the Aegean, SYMPLEYSIS benefitted from comprehensive communication and connectivity coverage on islands including Sikinos, Donousa, Arkios, Lipsi, Agathonisi, Thymena, Fourni, and Ikaria. The mission's primary objective was to offer free medical examinations and related health services spanning over 20 specialties and fields. These included laboratory blood and biochemical tests, as well as diagnostic examinations in areas such as gynecology, cardiology, dentistry, ophthalmology, pediatrics, and more. Nova's support played a crucial role in enabling SYMPLEYSIS volunteers to seamlessly coordinate their efforts and provide essential medical care to communities in need across these remote islands. Through the power of technology and collaboration, Nova and SYMPLEYSIS are making a meaningful difference in improving healthcare access for underserved populations.

Our ongoing Commitment to Marine Protection: A Successful Cleanup Initiative in Amorgos

In 2023 and in collaboration with Aegean Rebreath, we undertook a joint volunteer initiative for underwater and coastal cleanups in Amorgos aimed at protecting the island's marine environment. Our efforts led to the retrieval of two tons of waste, including over 900 single-use containers, 500 kilograms of abandoned nets, and a substantial amount of other debris.

Working alongside Aegean Rebreath and local authorities, our volunteers focused on ports and reefs, successfully removing waste and neglected fishing nets. This marked the third time our volunteer team actively participated in Aegean Rebreath's program for cleaning Greek coasts and seabeds, reflecting our commitment to clean seas and beaches, aligning with the United Nations' 14th Sustainable Development Goal, "Life Below Water."

Additionally, Nova recently announced a support program amounting to one million euros for restoration projects in areas affected by natural disasters. In cooperation with relevant state authorities, we pledged to contribute to the national effort both financially and with our expertise. Furthermore, we committed to continuing our support for subscribers in all affected areas.

Volunteer Cleanup Action on Mount Hymettus

In 2023, we organized a volunteer cleanup action for Mount Hymettus on June 8th. This initiative took place under the "Zero Plastic Hymettus" program of the Hymettus Protection and Development Association (S.P.A.Y.), in collaboration with Aegean Rebreath. Our three volunteer teams collected and removed hundreds of liters of plastic waste and garbage, contributing to a cleaner environment and highlighting the natural beauty of the mountain.

Our large volunteer group participated wholeheartedly in this initiative, reflecting Nova's commitment to sustainability. Mount Hymettus serves as a crucial green area in the region, covering more than 80,000 acres and hosting over 600 plant species, along with rare or endangered animal species at a European level.

The next stops in Nova's extensive program with Aegean Rebreath include Gythio and Monemvasia, where specialized divers from Aegean Rebreath will dive to locate and collect fishing nets. Additionally, two more underwater cleanups are scheduled for Amorgos and Corfu by October, focusing on areas of genuine natural beauty that have suffered due to underwater debris and discarded fishing nets.

Nova's 1 Million Euro Support Program for Disaster-Affected Regions

In 2023, we, announced a support program totaling 1 million euros aimed at restoration projects in areas affected by natural disasters, including wildfires and recent flooding. This initiative reflects our commitment to aiding the recovery of impacted regions.

We committed to collaborating with state authorities, providing both financial resources and expertise to assist in national recovery efforts. Our first project focuses on flood control and erosion prevention in the Evros region, highlighting the urgent need for these interventions in the ongoing recovery process.

This initiative aligns with the decision made by the Minister of Environment and Energy, Mr. Theodoros Skylakakis, last August. This decision expedited the construction of erosion control and flood prevention projects across the country, along with the immediate appointment of restoration contractors in fire-affected areas where flooding risks are heightened.

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

17 PARTNERSHIPS FOR THE GOALS

13

Policies/Codes

5

ISO Systems

0

Incidents of corruption / bribery

38mil €

Invested in network expansion

WE STRIVE FOR TRANSPARENCY

7.1 Organization and Management of Nova

7.1.1 Responsible Management

Nova, as a key member of the United Group, the leading provider of telecommunications and media services in Southeast Europe, is committed to implementing high standards of corporate governance that address the challenges of modern business sustainability. For Nova, corporate governance is not merely a regulatory compliance framework but a strategic choice that promotes sustainable growth, trust, and transparency in its operations.

The company has adopted a clear governance structure with transparent decision-making processes that incorporate risk management and compliance with the applicable regulatory framework. The Board of Directors plays a pivotal role in ensuring effective governance, setting strategic priorities, and monitoring the impact of initiatives. Additionally, Nova has established robust internal control mechanisms that help prevent and proactively manage risks, thereby strengthening the company's operational integrity. A cornerstone of Nova's governance strategy is its active engagement and open communication with all stakeholders. The company promotes transparency through the disclosure of financial, social, and environmental information while implementing policies that uphold business ethics. To this end, Nova has introduced a code of conduct that guides the behavior of its employees and partners, fostering trust among customers, suppliers, and the broader community.

Nova is also strongly committed to promoting diversity and equality by developing inclusive policies and fostering a workplace environment that supports professional growth and collaboration. Furthermore, recognizing the importance of innovation for long-term sustainability, the company integrates cutting-edge digital solutions and advancements into its daily operations.

Furthermore, Nova is committed to enhancing the knowledge of its highest governance body on sustainable development by organizing educational programs for its top 150 employees. The performance of the highest governance body is evaluated annually, similar to all employees, though it is not currently linked to environmental or social objectives. These evaluations are conducted independently, ensuring objectivity and impartiality, reflecting Nova's dedication to transparency and accountability.

Finally, with a strong focus on sustainability and social responsibility, Nova invests in initiatives aligned with the United Nations Sustainable Development Goals (SDGs). The company remains dedicated to strengthening its governance values, striving to balance economic performance, social contribution, and environmental stewardship.

Board of Directors

The company was managed by the following members of the Board of Directors consisting of three (3) members. In more detail:

Composition of the Board of Directors of Nova Telecommunications as of 31.12.2023:

| Nikolaos Stathopoulos | Panagiotis Georgiopoulos |
| Chairman of the Board | Managing Director |

| Georgios Lambrou |
| Board Member |
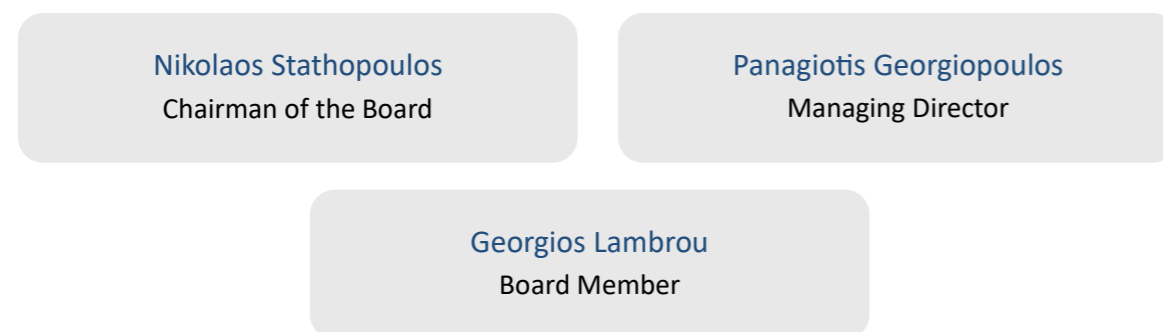
Nova's Management Team

Nova's Management Team	
Panayiotis Georgiopoulos	VICE-CHAIRMAN OF THE BOARD OF DIRECTORS & CHIEF EXECUTIVE OFFICER
Kiki Silvestriadou	CEO OF NOVA MEDIA
George Lamprou	CHIEF FINANCIAL OFFICER
Michael Anagnostakos	CHIEF MARKETING OFFICER
Christos Noulis	CHIEF COMMERCIAL OFFICER
Manolis Grigorakis	CHIEF TECHNOLOGY OFFICER
Tasos Tsoumanis	HUMAN RESOURCES EXECUTIVE DIRECTOR
Katerina Maniadaki	CHIEF LEGAL & REGULATORY OFFICER
Dimitris Magkos	B2B EXECUTIVE DIRECTOR
Alexandros Bregiannis	PUBLIC SECTOR & ICT EXECUTIVE DIRECTOR
Martha Kesisoglou	CORPORATE AFFAIRS EXECUTIVE DIRECTOR
Vasilis Vasilakis	INFORMATION SYSTEMS EXECUTIVE DIRECTOR

7.1.2 Communication with the Management

In order to define the strategy for the achievement of their investment plan Nova., communicated with shareholders at regular intervals to promptly inform them about developments in the company and the Greek market in general. The constructive and two-way communication also continued between the employees and the Board of Directors.

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

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

7.1.3 Organizational Chart

NOVA TELECOMMUNICATIONS

Chief Executive Officer (CEO)

Group Internal Audit

Wholesale UGI

Risk & Fraud Management

Compliance, Risk & Sustainability

Internal Audit

Compliance

Physical Security

Secretariat

Commercial | Marketing | B2B | Technology | Information Systems | Finance | Legal & Regulatory | HR | Corporate Affairs
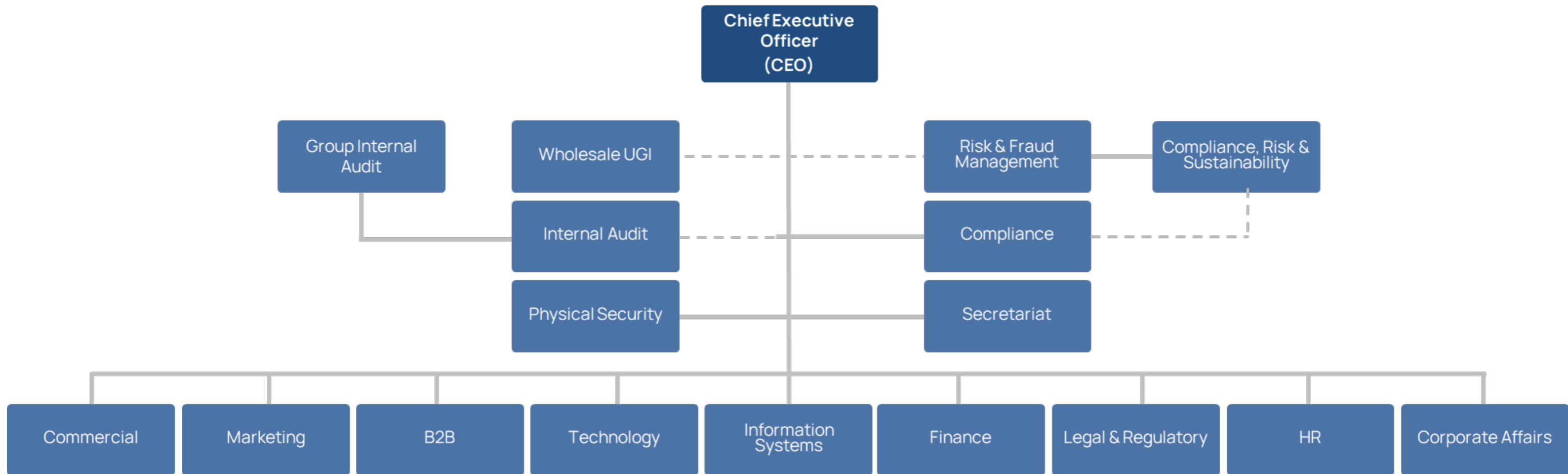
7.1.4 The Committees

The activities of the Boards of Directors of Nova Telecommunications, were supported through the operation of the following committees:

Senior Management Committee

1

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

Investment Committee

2

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

Special Committee on Information Security & Personal Data Protection

3

The purpose of the Information & Personal Data Security Special Committee is to establish a corporate information security and personal data protection policy and its implementation by employees of the companies in order to ensure confidentiality, information integrity and personal data protection. The committee is the central authority of the above-mentioned companies that managed the information security policy and can propose corrective actions, with the aim of maintaining and strengthening the information security control mechanisms within the Company's processes and systems. The members of the Committee are all members of the Senior Management Committee, the Data Protection Officer (DPO) and the Head of the Information Security Department. The DPO at Nova, facilitates GDPR compliance for the data controller and processor by offering advisory support and acting as a liaison with stakeholders, such as supervisory authorities and data subjects.

7.2 Policies

To ensure that our business activities are conducted with respect and responsibility, we have implemented a range of policies that are already in place. At the same time, we remain committed to developing new policies, carefully tailored to evolving needs, to drive continuous improvement and safeguard personal data, telecommunications privacy, and the environment. Below is an overview of our policies for 2023.

Quality policy

Nova's Quality Policy focuses on consistently delivering top-tier products and services in the telecommunications and entertainment sectors. Guided by innovation, reliability, and a customer-centric approach, Nova is committed to maintaining the highest standards of quality, fostering trust, and ensuring continuous improvement to meet evolving market and stakeholder needs.

Environmental Policy

Nova's Environmental Policy emphasizes its commitment to sustainable operations and minimizing its environmental impact. We focus on energy efficiency, waste reduction, and the responsible use of natural resources.

Security Policy for Ensuring the Confidentiality of Communications

Nova's Security Policy is dedicated to safeguarding the confidentiality, integrity, and availability of communications. We implement robust security measures, adhere to stringent data protection standards, and continuously invest in advanced technologies to ensure the privacy of our customers. Nova is committed to maintaining trust by proactively addressing emerging security challenges and complying with all applicable legal and regulatory requirements.

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

Nova's Whistleblowing Policy is designed to ensure compliance with legislation and uphold the highest ethical standards. It reflects our commitment to open and accountable management by providing clear guidelines and robust protections for reporting offenses or breaches of the Code of Conduct within the workplace or in dealings with third parties.

Business Continuity Management Policy

Nova's Business Continuity Policy ensures the company's ability to deliver critical services and maintain operations in the face of unforeseen disruptions. By implementing comprehensive risk management strategies, robust contingency plans, and regular testing, we are committed to safeguarding the reliability of its telecommunications and entertainment services.

Occupational Health and Safety Policy

Nova's Occupational Health and Safety Policy is focused on ensuring a safe and healthy working environment for all employees, contractors, and visitors. With an ISO 45001:2018 certified management system in place, we adhere to the highest international standards for identifying, managing, and mitigating workplace risks. We are committed to fostering a culture of safety through ongoing training, proactive risk assessment, and continuous improvement, aiming to prevent accidents, injuries, and occupational illnesses across its operations.

Conflict of Interest Policy

We are committed to maintaining the highest standards of integrity and transparency. Our policy on conflicts of interest ensures that all employees, board members, and contractors avoid situations where personal interests may interfere with their professional duties or our company's interests.

Supplier Code of Conduct policy

We hold ourselves and our suppliers to the highest standards of ethical conduct. Our Supplier Code of Conduct Policy for suppliers outlines the expectations we have for all our partners in ensuring that their practices align with our commitment to integrity, sustainability, and respect for human rights.

Privacy Policy

We take privacy and data protection very seriously. Our Privacy policy outlines our commitment to safeguarding personal data and ensuring that we comply with all applicable data protection laws and regulations. We are dedicated to handling all personal information with the highest level of confidentiality, transparency, and security.

Policy on preventing and combating violence and harassment

We are committed to maintaining a workplace free from harassment of any kind. Our Anti-Harassment Policy is designed to foster a respectful, inclusive, and safe environment for all employees, contractors, and visitors.

Due Diligence Policy

We prioritize transparency and accountability in all our business operations. Our Due Diligence Policy ensures that we assess and manage risks related to legal compliance, environmental impact, and social responsibility across all our partnerships and business relationships

Anti-corruption and Bribery Policy

We are committed to conducting our business with the highest ethical standards. Our Anti-Corruption and Bribery Policy strictly prohibits any form of corruption or bribery in all aspects of our operations, both within the company and in dealings with third parties.

Internal Audit

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

7.3 Privacy Protection

Privacy Policy

At Nova, the protection of personal data is a key priority. The company complies fully with the General Data Protection Regulation (GDPR) and other relevant national laws, ensuring the lawful, fair, and transparent processing of personal data for defined purposes. Adheres to the strictest policies to ensure the confidentiality, integrity, and availability of its customers' personal data. It takes all necessary measures to protect this data and processes it transparently, always in compliance with legal requirements.

Key Aspects of Nova's Data Protection Policy:

Lawful Processing

Nova processes personal data in compliance with legal requirements, ensuring transparency towards its subscribers. Data is only processed for specified, legitimate purposes, such as fulfilling contractual obligations, billing, customer service, or ensuring network security.

Data Minimization and Accuracy

Nova adheres to the principle of data minimization, collecting only the necessary data required for the specified purposes. The company ensures that all data is accurate and up-to-date, taking appropriate measures to correct or delete inaccuracies.

Security Measures

The company has implemented strong technical and organizational measures to protect personal data. These include secure data storage systems, restricted access, and regular reviews of security protocols to mitigate risks such as unauthorized access, loss, or damage of data.

Privacy Policy
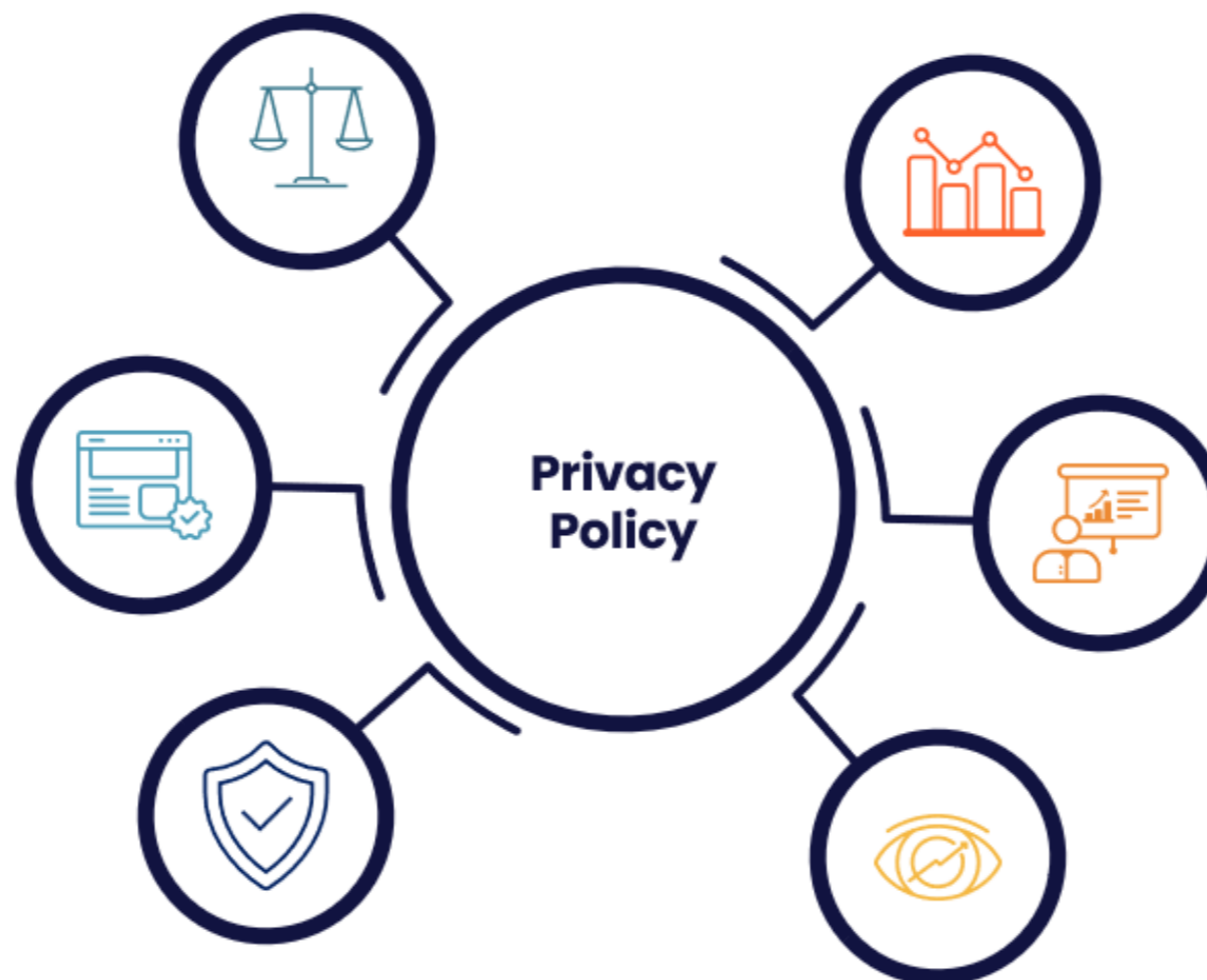
Subscriber Rights

Nova facilitates the exercise of subscriber rights, including access, rectification, deletion, restriction, and data portability. The company is committed to responding promptly to all data-related requests, ensuring compliance with GDPR requirements.

Third-party Sharing

Nova only shares personal data with third-party service providers for necessary purposes, such as payment processing, customer support, and marketing, under strict agreements to ensure data protection compliance.

Data Retention

The company has established a clear data retention policy, storing personal data only for as long as necessary. Specific legal and operational requirements determine the duration for which data is retained, ensuring that it is securely deleted when no longer needed

Incident Management

In the event of a data breach, Nova has procedures in place to promptly address and report incidents to the relevant authorities, minimizing the impact on individuals and complying with legal obligations.

7.4 Risk and opportunity management

Nova, as part of United Group, has a comprehensive Enterprise Risk Management (ERM) Framework to prioritize and manage exposure to potential risks. This ensures risks are mitigated to acceptable levels, allowing us to achieve strategic objectives with confidence and clarity. The ERM process is centralized for UG and applies to all Operating Companies, including Nova, ensuring a consistent approach across the group. This approach is underpinned by our commitment to maintaining a risk tolerance aligned with our business objectives, values, and stakeholder expectations.

To manage risks effectively, United Group's Board has developed a governance structure that includes a Risk Charter, Policy, and Methodology. These documents serve as the foundation of Enterprise Risk Management, describing the responsibilities of key stakeholders, setting the guidelines for managing risks and explaining the techniques to be used to identify, assess, and respond to risks and opportunities.

Our risk management process is in alignment with the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework, and ISO31000 standards. Climate considerations are also integrated into our strategy, enabling a forward-looking approach that addresses both risks and opportunities, including the transition to a low-carbon economy.

We adopt an end-to-end approach to risk management, by engaging local entities, and group functions in the risk assessment process. The Risk function coordinates across all entities, fostering a culture of risk awareness and accountability, while encouraging collaboration and knowledge sharing across the Group. This ensures that each entity, contributes to group-wide sustainability goals by reducing emissions, improving energy efficiency, and helping customers lower their carbon footprint.

The risk management process includes the following steps:

Risk identification and categorization

Risk identification involves identifying potential risks that that could impact United Group by gathering relevant information from various sources such as historical data, interviews, industry reports, 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.

All identified risks are systematically categorized into distinct types to allow a targeted analysis. The categories cover various aspects of the organization, including:

- Strategic
- Operational
- Financial
- Technological
- Legal & Regulatory
- Compliance
- Climate Change and Environmental

These risks are documented in our Risk Register, which includes key details like descriptions, causes, existing controls, evaluation scores, mitigation strategies, and risk owners. 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

Our evaluation process uses a hybrid top-down and bottom-up approach, allowing for comprehensive risk analysis by United Group and its Operating Companies. This ensures both strategic and operational risks are considered, with values assigned to each risk based on defined criteria for likelihood and impact.

Risk Response

Following the risk evaluation, we prioritize risks and develop mitigation strategies, considering their financial, operational, reputational, and market impacts. Mitigation plans with assigned responsibilities and timelines are established, regularly updated, and reported using our risk management tools.

Monitoring and reporting

Actions are implemented to mitigate risks and capitalize on opportunities, with respective risk owners responsible for execution and evaluation. Monitoring mechanisms track the progress of mitigation activities and assess response effectiveness. The Executive Director of Compliance, Risk & Sustainability reports climate-related risks and opportunities to the Board of Directors quarterly.

7.5 Strong Compliance and Ethics

Nova is consistently distinguished for its commitment to Ethical Conduct and Compliance with legal requirements, regulations, and industry best practices. During this challenging period, Compliance through 2023 played a key role in ensuring a smooth transition during the merger of companies by harmonizing compliance practices, policies, and procedures. We first updated the Code of Business Conduct and Ethics and the Supplier Code of Conduct. We made Compliance a priority and began work to enrich the newly created organization's Compliance Program and communicate it to everyone.

7.5.1 Nova's Code of Business Conduct and Ethics

At Nova we all have an obligation to act with integrity in the performance of our duties Nova's Code of Business Conduct and Ethics is a foundational document that guides the behavior of employees, partners, and executives in all daily operations of the company. Nova is committed to ensuring that all business practices align with principles of ethics, integrity, and transparency. The Code reflects the company's commitment to upholding the highest ethical standards and complying with applicable laws and regulatory requirements.

NOVA's
Code of Business
Conduct and Ethics

- Integrity and Decision-Making
- Respect for Diversity and Combating Discrimination
- Health and Safety
- Protection of Information and Privacy
- Transparency and Accountability
- Protection of Company Assets

Integrity and Decision-Making

Nova requires all its employees and executives to make decisions based on the highest standards of ethics and integrity. The Code specifies that decisions should not be influenced by personal interests but must always serve the best interests of the company and its stakeholders, including customers, suppliers, and society at large. Every decision must be made in accordance with company policies and transparency. The Code emphasizes the importance of making ethical decisions when facing doubts or pressures. It encourages employees to seek advice from their supervisors or compliance officers before making difficult decisions.

Respect for Diversity and Combating Discrimination

Nova recognizes the importance of creating a work environment that promotes diversity, equality, and inclusion. The company's Code of Conduct mandates that all employees must be treated with respect and dignity, regardless of gender, ethnicity, religion, sexual orientation, or other personal characteristics. The company has clear policies against harassment and discrimination in the workplace, while fostering an environment where all employees feel

Health and Safety

The health and safety of employees are top priorities for Nova. The company's Code of Conduct ensures that all employees have the right to work in a safe environment that complies with all required safety and hygiene standards. Nova is committed to providing the necessary tools and training to avoid accidents and promote employee well-being. Additionally, the company maintains open channels for reporting any omissions or incidents related to safety in the workplace, 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. Nova employs strong technical and organizational methods to protect information from unauthorized access, loss, or destruction. Employees are required to handle any information they collect or process with the utmost respect and to fully comply with data protection regulations.

Transparency and Accountability

Nova is committed to transparency in all of its activities and encourages accountability at every level of the corporate hierarchy. The Code of Conduct lays out a clear process for reporting and investigating violations, while also ensuring the protection of employees who report misconduct from retaliation. Employees have access to confidential reporting channels, and the company is obligated to handle these reports seriously, confidentially, and promptly, taking any necessary corrective actions.

Protection of Company Assets

Nova takes measures to protect its physical and intangible assets, such as facilities, products, and technological infrastructure. The Code outlines the rules for the responsible use of company property, ensuring that it is used solely for legitimate and business-related purposes.

#Nova One Team

Following the merger, we aimed to strengthen our culture by adopting behaviors aligned with the "Nova One Team" principles. A "One Day Offsite" for the Top 150 leaders and six interactive sessions with 25 participants each were conducted, featuring a holistic approach with learning modules, LEGO activities, videos, and outdoor exercises. Led by an experienced external facilitator and aligned with our strategic priorities, the program culminated with active participation from the Management Team, reinforcing commitment. The result was a clear behavioral model enhancing team effectiveness and driving organizational progress.
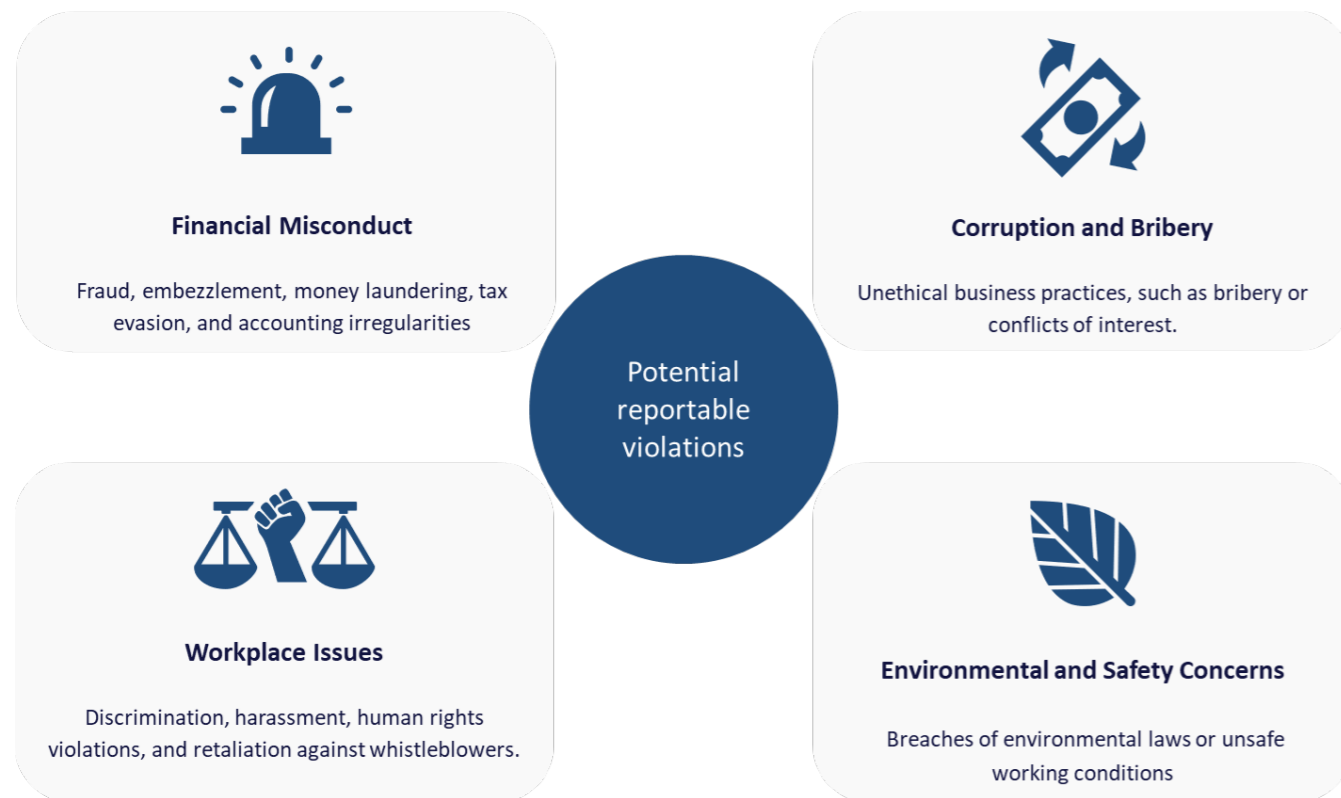
7.5.2 Integrity Helpline

Nova's support line, part of the United Group's compliance framework, provides a confidential platform for employees and stakeholders to report unethical behavior, fraud, and workplace misconduct. Managed by third-party provider NAVEX through the EthicsPoint software, the system ensures secure and anonymous reporting, promoting a culture of transparency and accountability.

The Integrity Helpline is designed to support Nova's commitment to ethical business conduct, enabling employees and external partners to report concerns without fear of retaliation. It meets legal requirements for confidential reporting channels in the EU, protecting Nova and the wider United Group from potential criminal actions or regulatory violations.

Accessible via telephone or online, the helpline is available to all Nova employees, including contractors, freelancers, and third-party vendors. Reports can be submitted in any primary language used in countries where United Group operates, ensuring inclusivity.

What Can Be Reported?

The helpline covers a wide range of potential violations, including:

Financial Misconduct

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

Corruption and Bribery

Unethical business practices, such as bribery or conflicts of interest.

Potential reportable violations

Workplace Issues

Discrimination, harassment, human rights violations, and retaliation against whistleblowers.

Environmental and Safety Concerns

Breaches of environmental laws or unsafe working conditions

Employees are encouraged to report any conduct that may violate company policies, laws, or general ethical standards. Nova guarantees that all reports are handled with the highest level of confidentiality. Reporters can choose to remain anonymous, with no tracking of IP addresses or other identifying information. If necessary, Nova informs the reporter of any legal requirements that may impact their anonymity, ensuring protective measures are in place.

Nova's Anti-Retaliation Policy protects whistleblowers, ensuring they face no negative consequences for reporting in good faith. The company is committed to maintaining a safe environment where concerns can be raised freely and without fear. During the reporting period, no critical concerns were communicated to the highest governance body, highlighting Nova's proactive approach to risk management and operational oversight.

Each report is assigned a unique code, allowing reporters to provide additional information or engage in confidential dialogue with the compliance team. This process ensures that all concerns are thoroughly investigated and addressed.

7.5.3 Regulatory Compliance Policies

Nova's Code of Conduct serves as the foundation for its ethical practices, setting forth the principles and rules that govern the company's relationships with employees, partners, and third parties. The Code aims to maintain Nova's reputation and market position by promoting transparency, ethical behavior, and trust. These policies ensure strong, long-lasting relationships with customers, suppliers, partners, employees, and shareholders, while enhancing the company's commitment to sustainability.

Zero Tolerance for Bribery and Corruption

Nova is committed to upholding the highest standards of ethics, integrity, and responsibility in all business practices. The company enforces a zero-tolerance policy against bribery, corruption, and fraud. This applies to all employees, regardless of their role or location within the company. Nova's commitment to ethical behavior ensures that every action is taken with honesty, transparency, and respect. Employees are encouraged to report any instances of unethical behavior, ensuring that Nova operates in compliance with laws and internal regulations.

- **Commitment to Integrity**: Employees are required to avoid any form of unethical conduct, whether it involves giving or receiving improper incentives.
- **Global Standards**: Nova complies with international anti-corruption laws and regulations, ensuring its operations meet the highest ethical standards worldwide.

Donations and Sponsorships Policy

Nova recognizes the importance of corporate donations and sponsorships in contributing to communities and supporting meaningful causes. However, to ensure that these activities are conducted ethically, all donations and sponsorships must go through a strict approval process. The company has established clear guidelines for making charitable contributions or sponsorships, ensuring that these are aligned with the company's values and do not create conflicts of interest. Donations and sponsorships must be approved through a formal process to ensure they are legitimate and do not serve as a disguise for unethical practices such as bribery or undue influence.

Gifts, Entertainment, and Travel Policy

Nova acknowledges that the giving or receiving of gifts, entertainment, or travel can create potential conflicts of interest or raise questions about the motives behind such actions. To mitigate these risks, Nova has implemented a Gifts and Entertainment Policy. The policy ensures that any offers of gifts, entertainment, or travel must be made for legitimate business purposes and should not influence or appear to influence business decisions. Employees are required to seek approval before offering or accepting any gifts or hospitality, and records of such transactions

must be kept ensuring transparency. This policy aims to maintain the integrity of decision-making processes, ensuring that no undue influence is exerted on employees or business partners.

Conflict of Interest Policy

Nova's Conflict of Interest Policy establishes clear guidelines for identifying, disclosing, and managing situations where personal interests could conflict with the interests of the company. This policy helps to safeguard the integrity of decision-making and prevents any potential biases or undue influence. Employees are encouraged to disclose any relationships or activities that might compromise their objectivity in performing their duties. Nova takes appropriate measures to avoid conflicts of interest, such as recusing individuals from decisions where a conflict exists or may appear to exist. The policy ensures that all potential conflicts are managed in a way that upholds the company's commitment to fairness and ethical behavior.

International Sanctions Policy

Nova, as part of the United Group, complies with all applicable international, national, and local laws regarding sanctions and embargoes. This includes adherence to International Sanctions imposed by governing bodies such as the United States, the United Nations, the European Union, and the United Kingdom. Nova ensures that all transactions involving specific individuals or countries subject to sanctions are in full compliance with applicable regulations. The company has procedures in place to identify and prevent dealings with entities or individuals on sanctions lists, protecting the business from legal and financial risks associated with non-compliance.

Violence and Harassment Prevention Policy

Nova enforces a zero-tolerance policy against any form of violence, harassment, or **sexual harassment** in the workplace. The company is dedicated to creating a safe, inclusive, and respectful work environment for all employees, partners, and stakeholders. Respect for human dignity is a core element of Nova's culture. Any form of violence or harassment—whether verbal, physical, or psychological—is strictly prohibited. Nova takes a strong stance against gender-based violence and sexual harassment, ensuring that all employees are protected from these behaviors. Employees are encouraged to report any incidents of violence or harassment, and the company ensures that reports are handled confidentially, with immediate action taken against perpetrators.

These regulatory compliance policies form the backbone of Nova's corporate responsibility and help the company promote ethical practices across all aspects of its business. By adhering to these policies, Nova ensures that its operations are conducted with transparency, integrity, and respect for the law. This approach not only safeguards the company's reputation but also contributes to its long-term sustainability and success.
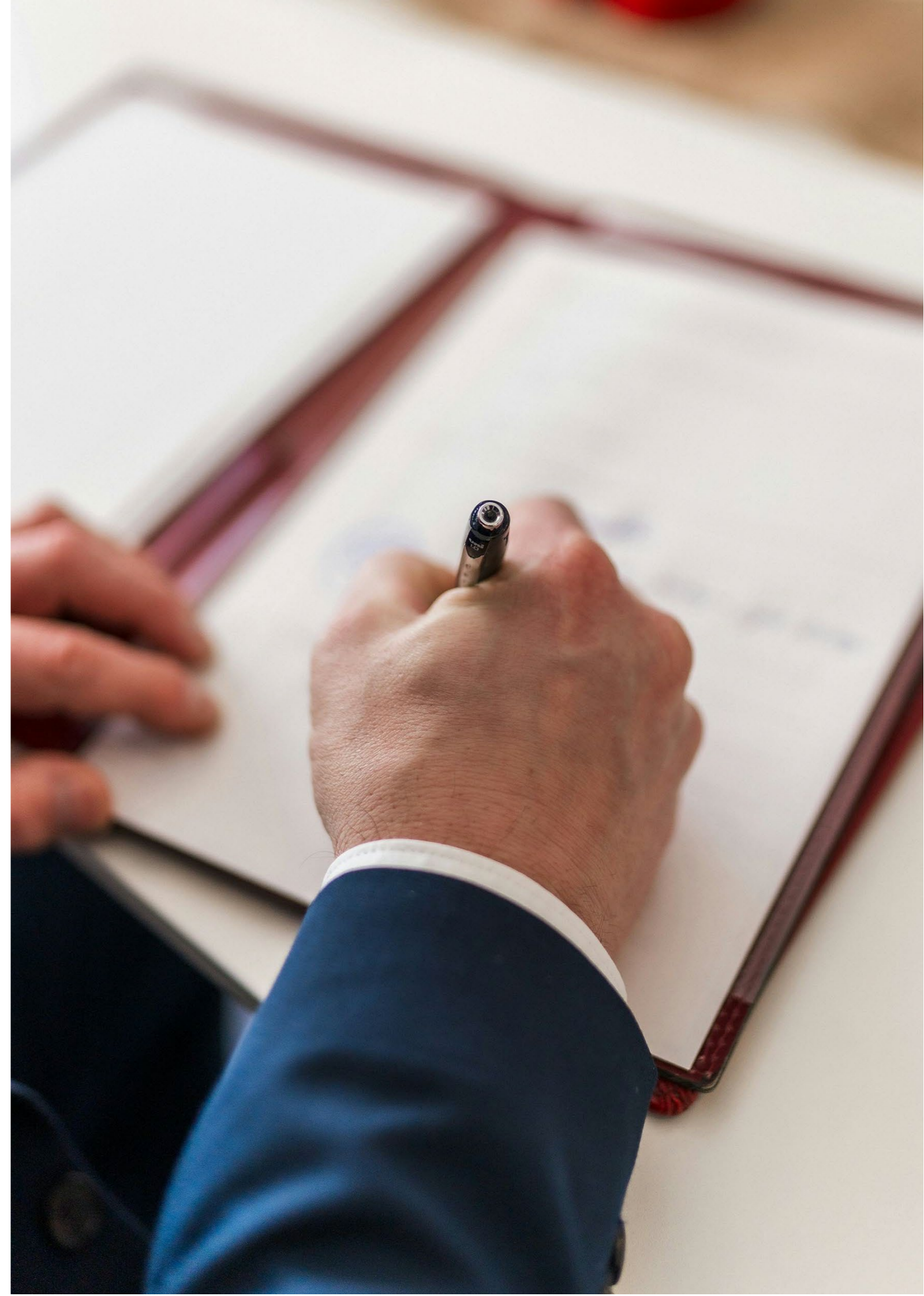
7.6 Compliance with Partners

At Nova Greece, our commitment to building a robust compliance program extends beyond our own operations to encompass our relationships with suppliers and partners. By aligning with international standards and fostering shared values, Nova has established a comprehensive Supplier and Partner Code of Conduct that reflects our dedication to ethical business practices and responsible corporate culture. This code aligns with our participation in the Responsible Business Alliance (RBA) and serves as a foundational element of our compliance framework, promoting integrity and sustainability across our supply chain.

Purpose of the Supplier and Partner Code of Conduct

The Supplier and Partner Code of Conduct is directed at Nova's key suppliers, project contractors, consultants, and partners across all areas of our business. The code aims to ensure that our suppliers and partners adopt and uphold Nova's core values of ethics, sustainability, and social responsibility, and that they, in turn, champion these principles within their own supply chains. By adhering to these standards, our partners contribute to a culture of integrity that extends beyond Nova to create a positive global impact.

Our Code integrates industry codes of conduct, international laws, ethical standards, and responsible business practices. While it does not replace local laws in the jurisdictions in which our partners operate, it complements existing legal frameworks, adding an ethical dimension to our contractual relationships.

Expectations for Suppliers and Partners

Nova Greece expects all suppliers and partners to adhere to the following principles:

Respect for Human Rights	Labor Law Compliance	Commitment to Sustainability	Compliance with the Code
Our partners must respect the personal dignity, privacy of communications, and rights of employees, trainees, and contractors.	Suppliers are required to comply with relevant labor laws and standards in their respective countries.	Nova expects suppliers to uphold and promote principles of sustainable development within their operations and their supply chains.	Suppliers agree to adhere to the Nova Supplier and Partner Code of Conduct as part of their agreements with us.

As an active member of the RBA, Nova is committed to upholding the RBA's Code of Conduct and standards, spreading this commitment throughout our supply chain to build a responsible corporate culture. We encourage our suppliers to join us in this effort, committing to continuous improvement and responsible business practices that support long-term societal and environmental well-being.

Policies Supporting Supplier Compliance

To ensure that our suppliers align with ethical practices, Nova has developed and implemented specific compliance policies, including:

International Sanctions Policy	Third Party Due Diligence Policy	Procurement Policy
This policy ensures that our suppliers comply with international sanctions and trade regulations, minimizing risks associated with restricted trade activities.	Through thorough due diligence practices, Nova minimizes risks associated with unethical suppliers, ensuring we engage only with reliable, qualified partners.	This policy and due diligence for international sanctions ensure objective supplier evaluation, prioritizing partnerships that align with standards in quality, sustainability, data security, compliance, labor laws, and employee safety.

Building a Culture of Responsibility

Nova Greece's Supplier and Partner Code of Conduct represents our commitment to fostering a responsible and ethical corporate culture. By working closely with suppliers who share our dedication to compliance and sustainability, we ensure that our operations support not only our business objectives but also the long-term well-being of our society and environment. Through this collaborative approach, Nova builds a resilient, trustworthy, and sustainable supply chain that supports our shared goals for responsible business.

7.7 Certifications

Our commitment to excellence is underlined by our pursuit of ISO certifications, internationally recognized benchmarks that attest to the highest standards of quality, security, and environmental responsibility. These certifications serve as a testament to our dedication to providing reliable and secure telecommunication and media services. The ISO certifications held by the company are presented below.

Quality Management

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

⇒ Design, Development, Implementation, Operation, Support and Maintenance of Telecommunications and Information Systems Infrastructure, Telecommunications and Data Networks, Information Systems and Applications.

⇒ Design, Development, Monitoring, Control and Support of the store chain.

The implementation of the quality management system includes:

- The Sale of Mobile and Fixed Telephony and Internet Services (Mobile, FREE2GO Prepaid, Q Prepaid, Fixed Telephony and Internet).
- The Retail Sale of Mobile and Fixed Telephony Devices, Electronic Equipment and Accessories.
- The Repair of Mobile Telephony Devices.
- After Sales Service for Private and Corporate Customers.

Health and Safety at Work

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

⇒ Design, Development, Provision, Sale and Support of Integrated Telecommunications Products and Services (Mobile and Fixed Telephony, Data, Internet and Broadband) for Individuals and Corporate Customers.

⇒ Design, Development, Implementation, Operation, Support and Maintenance of Telecommunications and Information Systems Infrastructure, Telecommunications and Data Networks, Information Systems and Applications.

⇒ Design, Development, Monitoring, Control and Support of the store chain.

⇒ After Sales Telephone Service for Private and Corporate Customers

Business Continuity Management

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

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

⇒ For this reason, we have developed a Business Continuity Management system under which we have defined and prioritized the critical functions, activities, infrastructure and services of our Company, as well as the resources that can be activated at any time.

⇒ In addition, we have identified and assessed any operational risks and taken all necessary measures to mitigate their impact on Nova's daily operations, implementing strategies and solutions that enhance the resilience of the organization.

⇒ At the same time, we continuously develop, implement, test, maintain and monitor these Business Continuity, Crisis Management and Communication Plans.

Environment and Energy

An environmental management system is applied to all activities in accordance with the international standard *ISO 14001*. The scope of application covers:

⇒ Design, Development, Provision, Sale, Pricing and Support of Integrated Telecommunications Products and Services (Mobile and Fixed Telephony, Data, Internet and Broadband) for Individuals and Corporate Customers.

⇒ Design, Development, Implementation, Operation, Support and Maintenance of Telecommunications and Information Systems Infrastructure, Telecommunications and Data Networks, Information Systems and Applications.

⇒ Design, Development, Monitoring, Control and Support of the Store Chain.

The implementation of the system in stores includes:

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

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

7.8 Financial Performance

The financial performance of Nova in 2023 highlights the company's strong operational foundation and strategic investments across its key business units: Nova Telecom & Media, Nova ICT, and United Fiber. The company maintained a strong customer base with 5,000,857 Revenue Generating Units (RGUs) and operated a network of 225 stores, ensuring accessibility and high-quality service delivery. Additionally, €60.7 million was allocated to employee wages and benefits, underlining Nova's commitment to its workforce as a key driver of its success. This performance reflects the company's focus on sustainable growth and operational efficiency in a competitive landscape.

Description (in million Euro)	2023		
	Nova Telecom & Media	Nova ICT	United Fiber
Turnover	805.8 €	6.2 €	42.7 €
Total CapEx	231.4 €	-	42.4 €
Total capitalization by debt	184.8 €	-	36.8 €
Total OpEx*	769.2 €	4.9 €	29.2 €
Total capitalization from own funds	383.8 €	1.5 €	78.8 €
Total assets	1,635.4 €	9.3 €	144.7 €
Employee wages and benefits	56.4 €	0.8 €	3.5 €
Mobile, fixed telephony and TV RGUs	5,000,857		
Number of stores at the end of the period	225		

Total OpEx are excluding employee wages and benefits

8. Performance

8.1 About the Sustainability Report

This Sustainability Report covers the period from 01.01.2023 to 31.12.2023 and constitutes the 2nd Sustainability Report of NOVA TELECOM & MEDIA Single Member S.A. (herein NOVA) which is headquartered in Athens. The previous report covered the period from 01.01.2022 to 31.12.2022 and was published in 2023.

Scope and Range

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

Content Definition

The Report provides both qualitative and quantitative insights into Nova's initiatives, focusing on four priority areas: Environment, Our People & Society, Customer Experience and Sound Governance. It highlights Nova's strategic approach, which emphasizes sustainable development and the integration of best practices in environmental stewardship, social responsibility, and ethical governance. Where applicable, comparisons with prior years are included, with any deviations analyzed in relevant sections to offer a clear view of Nova's progress.

Prepared by Nova's interdepartmental Sustainable Development Working Group, the Report follows the latest GRI International Standards (Global Reporting Initiative 2021) and the SASB (Sustainability Accounting Standards Board) standards specific to the telecommunications industry. These frameworks ensure accuracy, transparency, and comparability of data. Additionally, the Report incorporates the results of Nova's materiality analysis and aligns with the United Nations Global Compact principles and the Sustainable Development Goals of Agenda 2030, while the principles of the AA1000AP (2018) standard were taken into account, assured by AA1000ASv.3

At the end of the Report, tables outline Nova's alignment with both GRI and SASB standards, underscoring its dedication to transparency. This report reflects Nova's readiness to address environmental, social, and governance challenges, strengthening its market position and contributing to sustainable development and social well-being.

Independent Assurance

The Report is subject to external assurance by an independent body, namely the Inspection, Certification and Training Organization TÜV HELLAS (TÜV NORD) S.A., to confirm the preparation of the Report in alignment with the AA1000AP (2018) standard, which is assured by AA1000ASv.3. The Independent External Assurance Report is available on pages 60 – 61 of this Report.

8.2 Performance Table

Environment		
INDEX	Value 2023	Unit of measurement
Direct GHG Emissions (Scope 1)	4,465	tn CO_2e
Indirect GHG Emissions (Scope 2)	5,573	tn CO_2e
Other indirect GHG emissions (Scope 3)	66,950	tn CO_2e
Total CO2 emissions (Scope 1 & 2)	39,420.00	tn CO_2e
Total amount of energy produced	140,186.38	MWh
Percentage of energy produced from RES	0%	MWh
Total amount of hazardous waste	140.06	tn
Total amount of non-hazardous waste	64.36	tn
Percentage of waste by treatment type - Composted	0	%
Percentage of waste by treatment type - Incinerated	0	%
Total quantity of wastewater discharges containing pollutants	0	m^3
Total quantity NOx	N/A	
Total quantity SOx	N/A	
Total quantity of Volatile Organic Compounds (VOCs)	N/A	g/m^3
Total quantity of suspended particulate matter	N/A	kg
Total electricity consumption	125,013.00	MWh
Social		
INDEX	Value 2023	Unit of measurement
Total number of employees	1,359	No.
Female employees	528	No.
Percentage of female employees	38.85	%
Female employees in managerial positions	4	No.
Percentage of female employees in managerial positions	25	%
Employee Turnover	5.26	%
Recorded work-related injuries	0	No.
Fatal accidents	0	No.

INDEX	Value 2023	Unit of measurement
Incident frequency index (LTIR)[1]	0	%
Incident severity index (SR)[2]	0	%
Total hours of training	6,659	No.
Average hours of training per worker	4.90	No.
Total expenditure on training of workers	N/A	€
Total hours of training for men	3,836	No.
Total hours of training for women	2,822	No.
Governance		
INDEX	Value 2023	Unit of measurement
Number of Board Members	3	No.
Number of Women - Board Members	0	No.
Percentage of Women on the Board	0	%
Amount of fines for business ethics violations	N/A	€
Incidents of corruption / bribery	0	No.

8.3 Alignment tables

GRI content index

Statement of use	The information provided in this report reflects the activities of Nova for the period from 1/1/2023 to 31/12/2023 presenting its economic, environmental, and social performance. The report has been prepared in accordance with the Global Reporting Initiative (GRI) 2021 Standards.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	No applicable GRI Sector Standard

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION			GRI SECTOR STANDARD REF. NO.
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
General disclosures						
GRI 2: General Disclosures 2021	2-1 Organizational details	p. 3	A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.			
	2-2 Entities included in the organization's sustainability reporting	p. 3				
	2-3 Reporting period, frequency and contact point	p.49				
	2-4 Restatements of information	No restatements of information have been made from previous reporting periods.				
	2-5 External assurance	p. 49				
	2-6 Activities, value chain and other business relationships	p. 9				
	2-7 Employees	p. 24				
	2-8 Workers who are not employees	p. 24				
	2-9 Governance structure and composition	p. 36				
	2-10 Nomination and selection of the highest governance body	p. 36				
	2-11 Chair of the highest governance body	p. 36				
	2-12 Role of the highest governance body in overseeing the management of impacts	p. 36				
	2-13 Delegation of responsibility for managing impacts	UG's Sustainability report: Sections: 5.2.1 Board-Level commitment to Sustainability, 5.2.2 Group ESG Committee, 5.2.3 Local ESG Committees and 5.2.4 Appointment of Key Leadership Positions				

	2-14 Role of the highest governance body in sustainability reporting	p. 36			
	2-15 Conflicts of interest	p. 45			
	2-16 Communication of critical concerns	p. 44			
	2-17 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.			
	2-18 Evaluation of the performance of the highest governance body	UG's Sustainability report: Section 5.1.7 Evaluation of the Performance of the Highest Governance Body			
	2-19 Remuneration policies	According to the individual employment contract of each member of staff			
	2-20 Process to determine remuneration	UG's Sustainability report: Section 5.1.8 Remuneration Strategy			
	2-21 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.			
	2-22 Statement on sustainable development strategy	p. 15			
	2-23 Policy commitments	p. 39-40			
	2-24 Embedding policy commitments	p. 39-40			
	2-25 Processes to remediate negative impacts	p. 42			
	2-26 Mechanisms for seeking advice and raising concerns	p. 44			
	2-27 Compliance with laws and regulations	p. 42, (79 instances of non-compliance with laws and regulations for which fines were incurred, 29 number of fines for instances of non-compliance with laws and regulations that occurred in the current reporting period, 50 number of fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods"			
	2-28 Membership associations	p. 12			
	2-29 Approach to stakeholder engagement	p. 13			
	2-30 Collective bargaining agreements	p. 24			
Material topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	p. 14	*A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.*		

	3-2 List of material topics	p. 15				
Diversity and Equal opportunities						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 16, 24, 25				
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	p. 24				
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	p.16, 23				
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	In the reporting period there were no confirmed cases				
Innovation and digital transformation						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 16, 10. 11				
Nova Indicator	Completed projects	p.11				
Network investments						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 16, 29, 30,				
Nova Indicator	Amount of investments	p. 35				
Procurement practices						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 16, 31				
Nova Indicator	Responsible procurement practices	p. 20, 31				
Employee Training						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 16, 24, 28,				
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	p. 28				
	404-2 Programs for upgrading employee skills and transition assistance programs	p. 28				
	404-3 Percentage of employees receiving regular performance and career development reviews	p. 28				
Labour Rights						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 16, 24, 25				
Nova Indicator	Percentage of employees covered by collective bargaining agreements	p.24				
Electromagnetic Radiation						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 16, 22				
Nova Indicator	Number of external inspections	In 2023 were carried out electromagnetic radiation inspections in 433 sites and no exceedances of safe public exposure limits were found				
Ethical Practices and competition law						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 16, 36, 37, 42				
GRI 205: Anti-Corruption 2016	205-1 Operations assessed for risks related to corruption	The annual Risk Assessment, including risks related to bribery and corruption, was carried out in all functions of the organisation.				
	205-3 Confirmed incidents of corruption and actions	In the reporting period there were no confirmed cases				

	taken					
GRI 417: Marketing and Labeling 2016	417-2 Incidents of non-compliance concerning product and service information and labeling	In the reporting period there were no confirmed cases				
	417-3 Incidents of non-compliance concerning marketing communications	In the reporting year there were 6 cases incidents of non-compliance with regulations resulting in a warning				
Workers' health, safety and social benefits						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp.16, 26, 28				
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	p. 26				
	403-2 Hazard identification, risk assessment, and incident investigation	p. 26				
	403-4 Worker participation, consultation, and communication on occupational health and safety	p. 26				
	403-5 Worker training on occupational health and safety	p. 26, 28				
	403-9 Work-related injuries	p. 26				
	403-10 Work-related ill health	p. 26				
Support for local communities						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp.16, 33, 34				
Nova Indicator	Number of social actions implemented per year	5 major actions for the society				
Ensuring confidentiality, communication and personal data protection						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 16, 36, 37, 42				
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.		Confidential Data		
Accessibility, affordability and customer service						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 9, 10, 13, 14, 16				
Nova Indicator	Customer experience	p. 29				
Management of energy and Greenhouse Gas Emissions						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 9, 10, 13, 14, 16				
GRI 302: Energy 2016	302-1 Energy consumption within the organization	p. 18				

	302-4 Reduction of energy consumption	p. 18, 19				
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	p. 19				
	305-2 Energy indirect (Scope 2) GHG emissions	p. 19				
	305-3 Other indirect (Scope 3) GHG emissions	p. 19				
	305-5 Reduction of GHG emissions	p. 19				
Waste management and circular economy						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 9, 10, 13, 14, 16				
GRI 306: Waste 2020	306-3 Waste generated	p. 21				
	306-4 Waste diverted from disposal	p. 21				
Quality of service						
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 9, 10, 13, 14, 16, 32				
Nova Indicator	Time of response	p. 32				

SASB content index

	SASB	
ID	**Metric**	**Page**
TC-TL-130a.1	Percentage of electric energy from grid	p. 18
TC-TL-130a.1	Percentage of energy from renewable sources	p. 18
TC-TL-220a.1	Data Privacy	p.41
TC-TL-220a.2	Customers whose information is used for secondary purposes	0
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.
TC-TL-230a.2	Data security risks	p. 41
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 2023 there were no incidents of anticompetitive behavior and as a consequence 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 in order to: a) comply with the legal and regulatory framework, b) ensure the

		integrity and security of the network, c) maintain the integrity and security of the network.
TC-TL-520a.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 in order to: a) comply with the legal and regulatory framework, b) ensure the integrity and security of the network, c) maintain the integrity and security of the network.
TC-TL-520a.3	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: https://NovaWind.gr/etairia/etairiko-profil
TC-TL-550a.2	Technology Disruptions	8 Major Incidents (Technical Faults)
TC-TL-000.A	Wireless subscribers	2,251,726
TC-TL-000.B	Wireless subscribers	1,177,704
TC-TL-000.C	Broadband subscribers	1,170,667

A1000 Accountability Principle's content index

AA1000		
AA 1000 Principles	**Location**	**Page**
The Principle of Inclusivity	4.2 Stakeholders – Stakeholders Engagement	13
The Principle of Materiality	4.1 Sustainability Priorities	13
	4.3 Materiality Analysis	14
The Principle of Responsiveness	3.1 Group's Presentation	5
	4.4 Sustainable Goals for Nova	16
	5.1 Our Environmental Approach	18
	5.5 Electromagnetic Radiation	22
	6.1 Human Resources	24
	6.2 Diversity and Equal Opportunities	25
	6.5 Customer Experience (Quality of Service)	29
	6.5.5 Responsible Procurement	31
	6.7 Contributing to Society	33
	7.3 Privacy Protection	43
The Principle of Impact	3.5 Value Chain	9
	5.1 Our Environmental Approach	18-19
	6.1 Human Resources	24
	6.3 Health, safety and social benefits for employees	26
	6.5.4 Responsible Mobile Services	30
	6.5.5 Responsible Procurement	31
	6.7 Contributing to Society	33

8.4 External Assurance

I.   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 HELLAS)** the limited external assurance of the Sustainable Development Report, which covers the period of 1/1/2023-31/12/2023.
The Report refers to the activities of **NOVA** in Greece, including NOVA Telecommunications & Media Single Member S.A., United Fiber and NOVA ICT.

The scope of the project consists of the following:

A. The external assurance of the information disclosed to confirm that the Sustainability Report of **NOVA** for 2023 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 2023 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 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 Greek 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 **TÜV HELLAS'** opinion related to the quality of the Sustainability Report and its contents.

The responsibility of **TÜV 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 **TÜV 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 **TÜV HELLAS**, the conclusions are as follows:

A. External assurance of the information disclosed to confirm that the Sustainability Report of NOVA for 2023 adheres to the AA1000 AccountAbility Principles (Inclusivity, Materiality, Responsiveness & Impact) against the criteria found in AA1000AP (2018)

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.

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.

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.

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.

TÜV HELLAS did not realize anything that would lead to the conclusion of incorrect collection or transfer of data (qualitative & quantitative) 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 HELLAS states its impartiality and independence in relation to the project of **of NOVA** Sustainability Report external assurance. **TÜV 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 HELLAS was not involved in the preparation of the text and data presented in the Sustainability Report of **NOVA.**

Athens, December 17, 2024

For **TÜV HELLAS (TÜV NORD) TÜVNORD**

Nestor Paparoupas
Product Manager

AA1000
Licensed Report
000-209/V3-C88E1

LRQA Independent Assurance Statement
Relating to NOVA TELECOMMUNICATIONS & MEDIA SINGLE MEMBER S.A.'s GHG Inventory for the calendar year 2023

Terms of Engagement

This Assurance Statement has been prepared for United Group B V.

LRQA was commissioned by United Group B V to assure NOVA TELECOMMUNICATIONS & MEDIA SINGLE MEMBER S.A.'s (hereafter referred to as "Nova") GHG Inventory for the calendar year 2023, (hereafter referred to as "the Inventory").

The Inventory relates to direct GHG emissions and energy indirect GHG emissions.

Nova's geographical boundary includes their sites located in Greece. The main activities of the organization include telecommunications and media services in Southeast Europe, and the GHG emissions have been consolidated using an operational control approach.

Management Responsibility

United Group B V's Corporate Sustainability Team was responsible for preparing the claim, inventory and consideration of ISO 14064–1:2018, and for maintaining effective internal controls over the data and information disclosed. LRQA's responsibility was to carry out an assurance engagement on the Inventory in accordance with our contract with United Group B V. Ultimately, the Inventory has been approved by, and remains the responsibility of United Group B V.

LRQA's Approach

Our verification has been conducted in accordance with ISO 14064–3:2019, '*Specification with guidance for verification and validation of greenhouse gas statements'* to provide limited assurance that GHG data as presented in the Inventory have been prepared considering ISO 14064–1:2018, '*Specification with guidance at the organizational level for quantification and reporting of greenhouse gas emissions and removals'.*

To form our conclusions the assurance engagement was undertaken as a sampling exercise and covered the following activities:
- reviewed processes related to the control of GHG emissions data and records;
- interviewed relevant staff of the organization responsible for managing GHG emissions data and records;
- verified historical data and records at an aggregated level for the calendar year 2023.

Level of Assurance & Materiality

In accordance with our contract agreement, the assurance was conducted at a limited level of assurance at a materiality of 5% for all categories. The opinion expressed in this Assurance Statement has been accordingly formed.

LRQA's Opinion

Based on LRQA's approach nothing has come to our attention that would cause us to believe that the GHG emissions for direct GHG emissions and energy indirect GHG emissions disclosed in the Inventory as summarized in Table 1 below are not materially correct and that the Inventory has not been prepared considering ISO 14064–1:2018.

LRQA's Recommendations

Although the verification has been carried out successfully, in order to achieve a consolidated carbon footprint calculation method focused on more accurate results, it is recommended that United Group B V:

- Consolidate the process for data management by increasing control tools, such as including partial closures at defined intervals that provide reliable information for decision making.

Table 1. Summary of Nova's, GHG Emissions Inventory 2023

Scope of GHG Emissions	Tonnes CO$_2$e
Direct GHG emissions (Category 1)	**4 465**
Stationary combustion	2 838
Mobile combustion	842
Fugitive emissions from refrigerants	785
Energy indirect GHG emissions (Location-based) (Category 2)	**35 744**
Energy indirect GHG emissions (Market-based) (Category 2)	**5 573**
Location-based and Market-based are terminologies from Annex E of ISO 14064-1:2018.	

Signed   Dated: 30 June 2024

UKAS
VALIDATION &
VERIFICATION

0001

Silvia Matabuena

LRQA Lead Verifier

LRQA reference number: SGI00002347