CORPORATE RESPONSIBILITY

REPORT

2020



One Telecommunications

Embracing Responsibility

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A. MESSAGE FROM OUR CEO

Dear all,

The publication of One Telecommunications' first Corporate Responsibility Report coincides with the first phase of the company's journey towards new objectives. During 2020, we adapted to the unusual conditions, without losing sight of our projects and investments for a new and improved network and IT infrastructure. In what was a very challenging year for the world due to the COVID-19 pandemic, we managed to continue our key initiatives for 2020. We introduced One, with new governing principles, new values, and new goals. We implemented the technology transformations we promised and as a result we created solid foundations for a meaningful growth in the coming years and future value for our Stakeholders.

On the other hand, the COVID-19 pandemic in early 2020 surely impacted our efforts and initiatives, while the health measures taken affected both our business activity and our daily operations. The pandemic was only one of the main issues for the telecommunications sector in the world during the past year, while additional challenges include:

- Launch of 5G networks.
- Use of augmented/virtual reality (AR/VR).
- Internet of Things (IoT).
- Need for significant investments for infrastructure and service development.
- Data security and information loss (mainly personal data).
- Proliferation of information and communication technologies within companies to achieve digital transformation.

The present Report for 2020 outlines our efforts to advance in five main areas of Corporate Responsibility (Strategy & Management, Customers & Suppliers, Society, Employees and Environment) and highlights the meaningful progress we have achieved during the year. The Report has been prepared according to the Global Reporting Initiative's Sustainability Reporting Standards and presents our performance with clear and measurable indicators, in an effort to strengthen engagement and broaden dialogue with all our Stakeholders, as well as ensure organizational transparency and accountability. I am very proud of our Corporate Responsibility performance, as our commitments to our customers, suppliers, society, employees, and environment remained our guiding compass.

Looking forward, we recognize that there is still more work to be done, to generate long-term value, as well as to become the preferred operator of Albanians and the best working place in the country.

As a closing remark, I would like to express my sincere gratitude to every employee and to all our business partners, for their commitment and contribution to the company's progress. We remain committed to continue with the same dedication our progress and initiatives to bring positive change for our country.

Have a pleasant reading,

Emil Georgakiev Chief Executive Officer



B. ABOUT THIS REPORT



One Telecommunications' present Corporate Responsibility Report is the first Report our company issues. In our annual Corporate Responsibility Report, we display our approaches, programs and initiatives to understand and effectively manage our impacts, as well as the results related to our company's responsible operation

Principles

This Report follows the Global Reporting Initiative's (GRI) 'Sustainability Reporting Standards' (version 2016), while the following have also been used:

- The UN's Global Compact, for the principles of the Report.
- The EFQM's RADAR Card, for the presentation of quantitative data within the Report.

Scope

The Corporate Responsibility Report:

- Refers to the period 1/1/2019 31/12/2020 (unless indicated otherwise in certain points).
- Refers to all activities of One Telecommunications.
- Addresses all operations in Albania (management, provision and support of telecommunication solutions, mobile telephony, mobile broadband, roaming, mobile applications and services, as well as sales of mobile phones, tablets and smartwatches).
- Contains, as a norm, quantitative results for the last four years.
- Contains, as a norm, quantitative data from direct measurements, with exceptions of estimations and any restatements of data presented in the previous Corporate Responsibility Report 2018 clearly noted.

Terms

For convenient reading, please pay attention to the following terms and symbols:

- The terms 'One Telecommunications', 'company', 'ONE' or 'we' refer to One Telecommunications.
- The term 'Customers' refers to the final users of One Telecommunications' products and services.





 The terms indicated as 'III-2A', 'VI-2B' etc. refers to the Area, Section and Subsection of this Report (e.g. used in the GRI, Global Compact and Stakeholder Tables). For example, the term 'III-2A' makes reference to Area III (Our Customers and Suppliers), Section 2 (Responsible Marketing and Communication) and Subsection A (Applying Responsible Marketing practices).

Development

The Report has been developed in collaboration with STREAM Management (www.stream-eu.com)



Restrictions

One Telecommunications recognizes limitations in the Report it publishes, which intends to handle in future publications, such as:

- Presentation of more quantitative data and objectives.
- External assurance of the Report's principles and content.

Option of Report

This Report has been prepared in accordance with the GRI Standards: Core option.

Your feedback

One Telecommunications welcomes any questions, enquiries, clarifications or proposals to improve its Corporate Responsibility reporting. Kindly forward your comments, enquiries or suggestions to:

One Telecommunications SH.A Corporate Affairs Department Rruga 'Vangjel Noti', Laprake, Tirana, Albania E-mail: <u>info@one.al</u>

Main symbols

For convenient reading of this Report, please pay attention to the following symbols, which are widely used:

V Good Practice...

Highlights examples of good practices implemented by One Telecommunications.

🖵 Policy...

Highlights sections from formal corporate Policies.

? Did You Know...

Highlights information of particular interest.

Your Opinion...

Highlights findings from customer surveys.

I. INTRODUCTION



I. INTRODUCTION

1. Our Business Sector

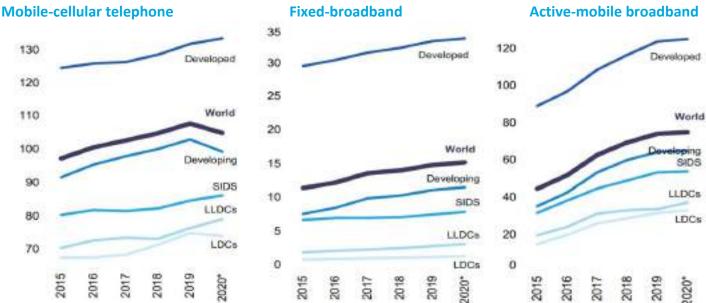
A. The International ICT sector

Being a fundamental sector in today's society, the Information and Communication Technology (ICT) sector encompasses all devices, components, applications and systems (e.g. mobile networks, Internet, satellite communications, landline communications, radio and television broadcast) for people and organizations to access and participate in an increasingly digital world.

As a result, individuals can access high quality communication (regardless of their age, physical health or other differences) and companies can utilize digital skills to fuel their economic growth and facilitate business operations, in order to shape a more dynamic society and competitive economy. Despite the sector's potential negative impacts as a result of its operations (e.g. energy and resources consumption, waste creation from products and their packaging, personal data protection and use of Internet by minors), the sector's wide array of applications can effectively be implemented in other industries for greater social and economic well-being. According to the 'SMARTer 2030' report by the Global e-Sustainability Initiative (GeSI), the international strategic partnership of ICT companies and industry associations, adoption of ICT sector's solutions from other industries by 2030 is estimated to:

- Connect 2.5 billion more people to ICT services, including access to e-health services for 1.6 billion people (mainly in developing and developed countries) and e-learning solutions for 500 million people.
- Allow 75% of the global population to be connected via smart devices and broadband Internet.
- Generate approximately \$11.4 trillion in economic benefits per year, with \$6.5 trillion of new revenues in key sectors and \$4.9 trillion of cost savings from greater efficiencies and decreased waste.

According to data from the International Telecommunication Union (ITU), the United Nations' specialized agency for ICT, the number of mobile-cellular telephone subscriptions declined for the first time in history. On the other hand, mobile-cellular telephone subscriptions continued to increase during the past year, which resulted overall in an estimated average of 105 mobile-cellular subscriptions per 100 inhabitants, compared to 108 in 2019. At the same time, following the substantial growth in previous years, active mobile-broadband subscriptions and fixed-broadband subscriptions slowed down as well during 2020, with approximately 75 active mobile-broadband subscriptions per 100 inhabitants.

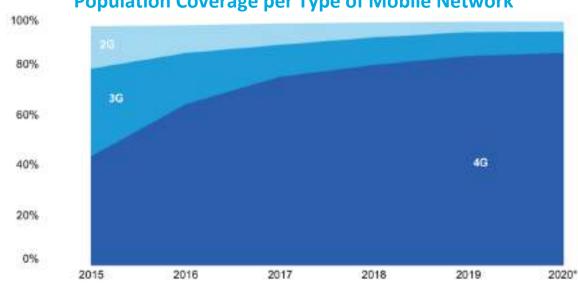


Global Subscriptions per 100 Inhabitants⁽¹⁾

(1) SIDS: Small Island Developing States; LLDCs: Landlocked Developing Countries; LDCs: Least Developed Countries Source: ITU's Measuring the Information Society Report 2020, June 2020 estimate (*)



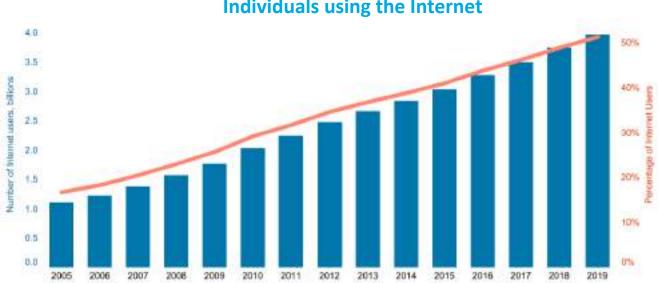
At the same time, approximately 85% of the world population is covered by a 4G network at the end of 2020, with 4G coverage being twice as high compared to 2015, despite the fact that coverage in 2020 is only 1.3 percentage points higher than 2019 and annual growth has been slowing down gradually since 2017.



Population Coverage per Type of Mobile Network

Source: ITU's Measuring the Information Society Report 2020, 2020 figures are estimates (*)

Internet proliferation continued to increase, as just over half of the world population was using the Internet at the end of 2019, with the proportion obviously being much higher among young people (15-24 years old), where the respective figure exceeded 69%.



Individuals using the Internet

B. The Albanian ICT sector

The ICT sector is considered to be highly important for greater economic and social development in Albania and the Albanian Government has adopted a series of Policies and initiatives to enhance the sector's footprint. According to the Albanian ICT Association's (AITA) data:

- The quality of national IT education steadily increases and supports the sector's future growth. .
- Most of Albanian ICT companies are small and medium-sized companies.

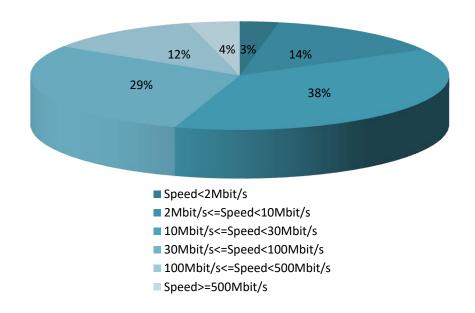




- Specialization fields for Albanian ICT companies are software design and development, system integration and hardware distribution.
- Approximately 80% of ICT companies collaborate with international companies in the domestic market.
- ICT companies gradually expand their presence in EU markets.

In this respect, at the end of 2020, according to the Institute of Statistics (INSTAT), the statistical service in the Republic of Albania, approximately 98.3% of companies with over 10 employees use computers for work purposes, compared to 97.5% in 2019, while 28.2% of companies have specialists in the area of information and communication technology, compared to 23.4% in 2019. Approximately 27.2% of employees use computer for work purposes, compared to 26.8% in 2019, with significant differences among economic activities, as only 8% and 16.2% of employees use a computer in manufacturing and construction activities, while the respective percentages for companies operating in the information and communication sectors, repair of computers and communication equipment and professional, scientific and technical activities are 75.5%, 73.7% and 64.9%. Furthermore:

- Approximately 98.2% of companies with computers for work purposes have Internet access, compared to 97.8% in 2019, while 100% of companies with over 250 employees have Internet access.
- 96.3% of companies use fixed line Internet connection for business purposes, e.g. ADSL, SDSL, VDSL, fiber optics technology (FTTP), cable technology.
- 79.8% of companies have download speed higher than 10 Mbit/s, compared to 63.2% in 2019
- 44.6% of companies using computers with Internet access have a corporate website, compared to 44.5% in 2019.
- 88.9% use their website mainly to publish product catalogues or prices list, compared to 87.8% in 2019.
- 18.2% of companies use cloud services (e.g. to access computer programs, for storage capacities), compared to 11.4% in 2019.
- 35.1% of companies use internal automatic information sharing (e.g. sharing information between different functional areas for resource planning and management), compared to 38.5% in 2019.
- 22.5% of companies use customer relationship management (CRM) software, compared to 22.1% in 2019.
- 12.8% of companies have sold products/services via their website or dedicated applications, e-commerce
 marketplace websites and applications used by several companies for trading goods or services, with the highest
 share of e-commerce carried out by companies in the areas of accommodation and food service (38.2%),
 information and communication (30.1%) and administrative and support service (21.1%).



Maximum Download Speeds in Companies

Moreover, according to AKEP, the Albanian regulator in the field of electronic communications and postal service, the average monthly duration of calls from mobile service subscribers in Q4 2020 increased by 2.8% compared to Q4 2019,





and the average number of SMS sent decreased by 37.5%, while total duration of outgoing calls and SMS messages sent by mobile network subscribers in Q4 2020 reached approximately 1.4 billion minutes and 152 million messages, increased by 2.7% and decreased by 37.4% respectively, compared to Q4 2019. Additionally, the average active mobile broadband user consumed approximately 4.5 GB of Internet data per month in Q4 2020, which corresponds to approximately 29.3% increase compared to Q3 2019. Furthermore, there were approximately:

- 3.3 million mobile subscribers and 2.6 million active users of mobile services at the end of 2020, slightly decreased compared to 2019.
- 2 million active mobile broadband users and 1.9 million mobile broadband users from mobile handsets, increased by 11.7% and 13.1% compared to 2019.

2. Our Company

⁽⁾ Your Opinion... Mission

According to a survey conducted to our employees in 2020, 85% believes that our mission provides meaningful direction to them.

A. Who we are

One Telecommunications is a telecommunications company founded in 1995 as Albanian Mobile Communication (AMC), being the first mobile telecommunications company in Albania. The company operates in Albania and is registered under Law No. 9901/14.04.2008 'On Entrepreneurs and Companies' as amended, with its headquarters located in Tirana.

Market Performance

	2017	2018	2019	2020
Customer base (mobile only, excluding M2M) (million)	1.94	1.59	1.1	1.23
Customer base (including M2M) (million)	NR	NR	1.28	1.42
Internet customers (million)	0.49	0.48	0.57	0.72
Post-paid customers (million)	0.12	0.12	0.11	0.17
Pre-paid customers (million)	1.82	1.47	0.99	1.06
Customer market share (%)	39.5	37.6	32.6	37
Market share of all mobile services (mobile subscribers)	NR	34.5	32.6	36.9
Market share of all active users	NR	37	36.2	37
Market share of mobile active users	32.4	34.8	33.9	34.7
Market share of active data users (3G/4G)	NR	33.5	31.7	36
Population coverage (GSM coverage) (%)	99.8	99.8	99.8	99.8
Territory coverage (GSM coverage) (%)	92.5	92.7	92.7	92.7
Data traffic volume (terabytes)	12,609	16,973	18,601	23,830
New/improved offers provided (number)	45	58	20	22
New services provided (number)	30	13	1	4
Shops (number)	136	129	126	131
Own shops	7	3	3	3
Partner shops	129	126	126	128

NR: Not Reported

We increased the number of customers by 11.8%



B. Our Culture

One Telecommunications' approach reflects its strong customer focus:



Integrity: We are honest in every relation we establish. We are transparent with our clients; we are open with eachother. We are responsible towards the society where we live. Always, we will promise what is doable and we will deliver!

Competence: We know our job very well; we know what we are able to do. We enable communication and connection between people. We do it better every day.

Relevance: We really understand our audience and we will offer what they need and right now.

Friendliness: We are together in this journey. As employees, as clients, as general public. We know that success needs hard work, but we also will have fun along the way.

Beyond: We are ambitious towards ourselves & our clients. We are trying hard to offer the best network, a wide range of modern & affordable devices, to become the best working place in the country and the preferred operator of Albanians.





C. Our History

1996	•Albanian Mobile Communciation (AMC) launches commercial operations, being the first mobile telecommunications company in Albania.
2000	 COSMOTE acquires 85% of AMC's share capital, through COSMO-HOLDING ALBANIA S.A., COSMOTE's 97% owned subsidiary. AMC introduces the ALBAKARTA pre-paid card.
2003	•AMC's network reaches 90% population coverage and 80% geographic coverage.
2005	 AMC launches MMS services. AMC adopts COSMOTE corporate identity, being the first COSMOTE subsidiary to visually consolidate its position in the Group.
2007	 AMC is the first operator to introduce EDGE technology in the Albanian mobile market. AMC introduces WHAT'S UP pre-paid brand.
2008	•AMC joins Deutsche Telekom Group (DT Group), the leading telecommunications company in Europe.
2011	•AMC is the highest bidder for the second mobile telephony license in Albania. •AMC introduces "AMC Fix" fixed services.
2012	 AMC launches 3rd generation services in Albania, with the highest market data speeds (up to 48 Mbps). AMC's 3G infrastructure extends to approximately 95% of Albania. AMC is awarded with the Business Excellence prize for its 3G service, as well as the Partners Albania's Philanthropy 2012 prize for its continuous social contribution.
2017	 Telekom Albania is awarded with the Superbrand award. Telekom Albania is awarded with the "Best in Data" certificate during the P3 performance assessement. Telekom Albania is awarded as the "Best Company in Customer Service" in Europe within DT Group. Telekom Albania is awarded with the "Contribution to National Level" Prize for its major contributions to support healthcare, social and environmental development in Albania.
2018	•Main Shareholder enters into a discussion to sell its entire stake in Telekom Albania to Albania Telecom Invest AD.
2019	 Company ownership is completely transferred to Albania Telecom Invest AD. Telekom Albania was awarded the license to use the 800 Mhz frequency band.
2020	•Telekom Albania becomes One Telecommunications.





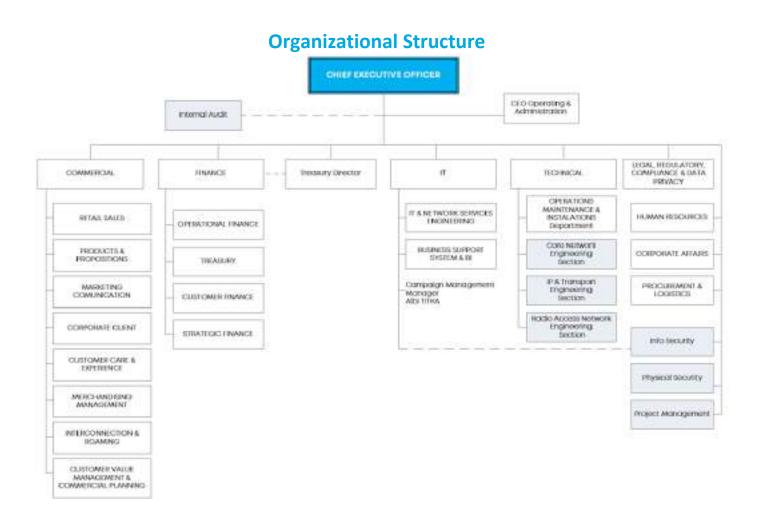
D. Our Strategy

One Telecommunications' strategy is to ensure an unparallel customer experience and service and highlights our aim to have our customers connected anytime and anyplace. As part of our strategic plan, our focus is to remain a financially robust company and strengthen our technologically advanced telecommunications network, in order to:

- Become the preferred operator of Albanians.
- Become the best working place in the country.

E. Our Structure

The company's organizational structure with the main functions and divisions is depicted below:



3. Our Shareholders

A. Albania Telecom Invest AD

Since 2019, One Telecommunications is owned by Albania Telecom Invest AD, which represents a group of well-known investors, managed by Mr. Spas Roussev, the largest shareholder in Vivacom, which is the largest independent telecom operator in Southeast Europe, and Mr. Elvin Guri, an Albanian-Bulgarian investor.

Shareholder Structure⁽¹⁾

Shareholder	Share
Albania Telecom Invest AD	99.899%
Small shareholders (former employees)	0.101%

(1) Data refer to 31/12/2020.



4. Our Products & Services

A. Our Offerings

One Telecommunications offers telecommunication services to individuals, families, public institutions and companies. Our main products and services are described below (for further information, please visit <u>https://www.one.al/</u>):

- **Post-paid (contract) and pre-paid services**, for retail and business customers with various rate plans, including unlimited packages and specially targeted products, such as Electronic Beats for millennials.
- Broadband Internet services, with speeds of up to 225 Mbps in 4G+ network.
- **Roaming services**, where customers can travel abroad, connect to one of our partner networks and contact their families and friends.
- Mobile phones, devices and accessories such as tablets, laptops, headsets, Bluetooth products, headphones, chargers and mobile phone cases.
- **Cloud services**, such as Office 365. One Telecommunications is an Office 365 Partner for Albania and offers Microsoft's Office solution and other cloud services (e.g. Skype for businesses), which can be installed in desktop PCs, notebooks, tablets and smartphones and eliminate the need for local IT infrastructure.
- B2B (Business-to-Business) solutions.
- M2M (Machine-to-Machine) solutions.
- **RCS Messaging**, which includes use of Rich Communication Services (RCS) features to allow interconnection with Vodafone counterparts for free-of-charge communication with only network data charges.
- RCS Rich Call, which allows rich call features (e.g. call video, file sharing) for all our subscribers, featuring the same charges as in RCS messaging.
- Other value added services, such as the One App, with all its features.

Sales of Products				
	2017	2018	2019	2020
Total sales of products (number)	16,173	17,690	13,567	25,035
Smartphones	9,435	10,741	10,876	20,799
Feature phones ⁽¹⁾	6,417	6,628	1,605	1,928
Fixed phones	214	80	-	-
Home Net	-	-	-	1,766 ⁽²⁾
Wearables + Bluetooth Headphones	-	-	-	241
Tablets	94	191	-	128
Netbooks	13	50	434	111
Sales of products through on line channels (number)	NR	NR	652	62

channels (number)

(1) Includes mobile devices only with buttons.(2) Data refer to September-December 2020.

NR: Not Reported

Total sales of products increased by 84.5%

Within 2020, One Telecommunications offered several new and improved offers and services, which include:

- The Roam Like At Home with Western Balkan countries (new tariffs with Western Balkans and Kosovo).
- The HomeNet.
- The One Unlimited Prepaid Bundles.
- The One Unlimited Plans.

B. Our Infrastructure Network

We have designed our telecommunication network with sufficient communication channels (network capacity) and simultaneous elimination of all interferences, in order to provide high quality services to our subscribers. At the same





time, we continuously monitor network performance and strive to optimize quality of communications, through suitable and innovative technologies. The communications interface between the user's device (either caller or receiver) and the network are handled by our Base Stations (BTS), which are the fundamental elements of our telecommunication network and feature all the necessary signal transmission and reception systems to connect them with the network's central points (i.e. Base Station Controllers and Mobile Switching Centers).

Currently, One Telecommunications has 539 sites for its 2G network, while achieving 95.5% territory coverage and 98.5% population coverage in its 3G network, as the result of being further deployed in 66 new sites, for a total of 598 sites. Additionally, the company continued to deploy its services in the 0.8 GHz, 1.8 GHz and 2.6 GHz spectrum with 4G technology and managed to achieve 93.7% territory coverage and 98.1% population coverage in 2020, as the result of being further deployed in 231 new sites, for a total of 598 sites.

One Telecommunications was the first mobile operator in Albania to launch the 4G+ service in September 2015, which reaches up to 225 Mbps and enables faster Internet access and data transmission. In 2019, the company was awarded the license to use the 800 MHz frequency band, for further 4G network expansion and capacity upgrades. During 2020, ONE Radio Access Network was fully modernized to the latest technology, while enabling 4G in 800MHz and 3G in 900MHz frequency band country-wide, which significantly improved voice and data services.

We achieved 98.5% and 98.1% population coverage through our 3G and 4G network respectively

C. Our Sales Network

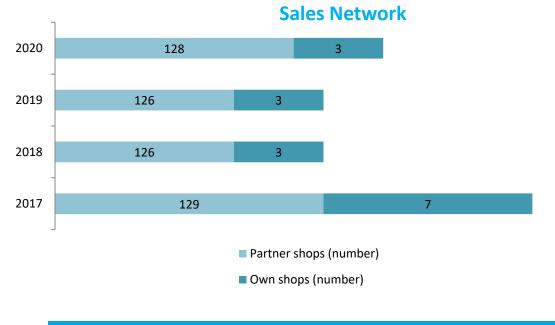
V Good Practice... Responding to the COVID-19 Pandemic

Due to the emergence of COVID-19 and acknowledgement by the World Health Organization (WHO) as pandemic in March 2020, we followed the official Yellow Protocol imposed by the Ministry of Health and therefore implemented various measures to protect employees' and customers' health, such as:

- Retained the minimum necessary number of employees in shops.
- Placed disinfectants, antiseptics, gloves and masks for employee and customer use.
- Installed glass panels to separate sales representatives from customers.
- Implemented reduced timetable as per Ministry's recommendations.

One Telecommunications continuously invests to develop its nationwide sales distribution network, in order to effectively serve its customers. Our sales network at the end of 2020 included 131 shops across the country, compared to 129 in 2019, while it must be noted that we perform quarterly and unscheduled security checks in our shops, with a total duration of 26 hours in 2020 (out of which 10 hours of scheduled and 16 hours of unscheduled security checks). Furthermore, in 2020, we:

- Introduced and installed a security mobile application in all mobile phones displayed in our own and partner shops (not in the entire inventory of devices), which blocks and helps us locate the device in case it is stolen from the shop.
- Configured and optimized the CCTV system in partner shops to increase efficiency, which we check daily for issues and security problems, and provided regular trainings to external partner personnel on the CCTV system's use.



We increased the number of shops in our sales network by 1.6%

We strive to ensure that our sales network is properly trained and to develop their employees' skills, though:

- Trainings, either in-class or on-the-job.
- Regular information provided through various channels, with over 300 communications prepared and sent, as well as 25 posts in the sales network portal (e.g. training materials, games, quizzes) within 2020.

Trainings in our sales Network					
	2017	2018	2019	2020	
Total training (hours)	11,323	16,229	NR	22,112	
Induction for sales representatives and promoters	4,576	5,604	NR	5,758	
New products and services	1,736	1,924	NR	5,760	
New platforms and features	2,432	3,224	NR	5,200	
Sales Techniques	1,715	3,157	NR	3,250	
Train the trainer	864	480	NR	524	
Bonus schema and shop experience	NR	1,910	NR	0	
Shop evaluation visits	NR	NR	NR	1,620	
Type of training (hours)					
In-class	9,384	9,698	NR	12,940	
On-the-job	1,939	6,121	NR	9,172	
Combined in-class and on-the-job	NR	480	NR	0	

Trainings in our Sales Network

NR: Not Reported

We increased training hours to our sales network by 36.2%, compared to 2018

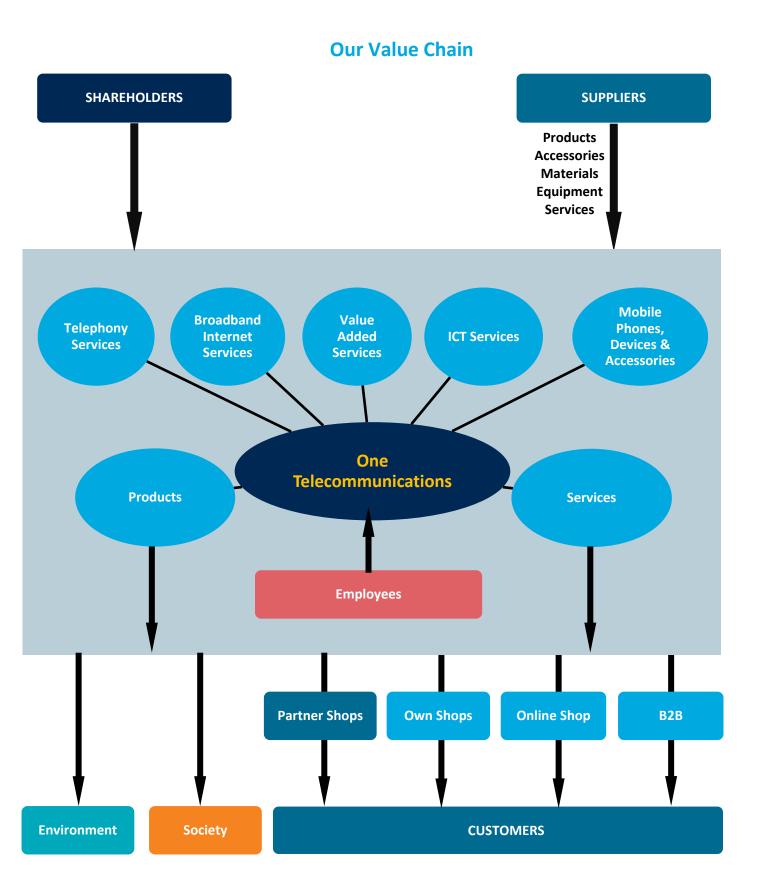
We delivered over 22,000 training hours to our sales network





D. Our Value Chain

For our operations, we utilize inputs from our Shareholder (information systems) and our suppliers (products, accessories, equipment, materials and various services). The available products, such as mobile phones, devices and accessories, as well as telecommunication services are distributed and provided to our retail customers through various sales channels, which include partner and own shops and our online shop, as well as the B2B channel for business customers.







5. Our Memberships and Recognitions

A. Our Memberships

We are members in the following institutions and organizations:

- American Chamber of Commerce.
- International Chamber of Commerce Albania (ICCA).
- Foreign Investors Association of Albania (FIAA).

II. OUR STRATEGY & MANAGEMENT

Introduction and Summary

Our Size:

5 areas of Corporate Responsibility

10 Stakeholder groups

13 quantitative targets in the Report

79 GRI disclosures in the Report

'Core' option Report, according to GRI Standards

Our Objective:

To incorporate responsibility into our business operations and daily management activities, as well as create measurable and tangible results to create value for our Stakeholders.

Our Achievements:

- We trained over 85% of new hired employees on Compliance and Anti-bribery Policies.
- We have communicated our Code of Conduct to 100% of our employees.
- No violation cases concerning our Code of Conduct occurred.
- We had no incidents of corruption.
- We had no non-conformities from audits regarding the operation of Management Systems.
 - We increased by 1.9% the number of quantitative indicators we make reference to within the Report.





1. Corporate Governance

A. Embedding responsibility into the way we operate

V Good Practice... Training on Compliance Policies

Compliance for One Telecommunications means to conduct all business activities with integrity and in accordance with the highest principles of ethics and legal standards, in order to conduct its activities with proper care, reduce possibility of corruption to minimize risk, increase business reputation and ensure stable and healthy business relationships. As a result, we conduct trainings on our Compliance Policies, in order to communicate the company's culture of ethics and compliance, as well as enhance respective knowledge. During 2020, we conducted trainings on the company's Compliance and Anti-bribery Policies (including the Code of Conduct) for new hired employees, as part of their Induction Training.

We trained over 85% of new hired employees on Compliance and Anti-bribery Policies

Code of Conduct: The company's Code of Conduct highlights our values and principles and sets the framework for our behavior and business relationships with various Stakeholders, guiding our daily work and defining the requirements on the following issues:

- Guiding Principles.
- Behavioral Requirements Pertaining to Integrity.
 - Business relationships with customers.
 - o Business relationships with competitors.
 - o Business relationships with suppliers.
 - Relationships with third parties.
 - Handling of information.
 - o Preventing conflicts of interest.
- Adhering to Behavioral Standards.
- Questions, Advice and Outlook.

It must be noted that the Code of Conduct:

- Is available on the corporate website and Intranet and has been communicated to all employees, who sign the Compliance Statement to formally commit and accept the company's Compliance Policies, including the Code of Conduct, with 95% of our employees signing the Compliance Statements during 2020.
- Applies to all BoD members, directors, managers and employees of One Telecommunications (despite contract type), as well as other partners, such as consultants and contracted employees.
- Is incorporated in all employment contracts.
- States that disciplinary actions for violations apply to individuals with intentional and unlawful misconduct, regardless of their rank or position, especially in cases of corrupt behavior or severe damage to the company's assets.
- Respects local laws and regulations, as well as related cultural customs.
- Specifically states adherence to the regulations regarding contracts for public sector orders, especially to avoid public officials' undue influence.
- Requires from employees not to pursue personal interests that conflict with corporate interests, such as the result of
 any employment outside the company, in which an employee is available to a third party, regardless paid or unpaid
 work, including self-employment (secondary employment).
- Does not permit the private use of company's property, unless otherwise stated in each individual's rights, in collective or personal agreements or according to operational procedures and regulations.
- Is communicated to One Telecommunications Partners and Suppliers through the corporate website, as well as supplier commercial agreements (see Subsection III-5B).





We have communicated our Code of Conduct to 100% of our employees

∨ Good Practice... Seeking Advice and Reporting Violations

All employees can seek advice on questions they may have during their day-to-day work activities and are not covered in detail by the Code of Conduct. For such issues, employees can either contact their supervisor or submit their questions to the Legal, Regulatory, Compliance and Data Privacy Department via the following channels:

- Send an e-mail to: <u>complianceoffice@one.al</u>.
- Contact the number: + +35542275276 (Monday to Friday, 9 AM 5 PM).

All employees are obliged to adhere to the Code of Conduct's principles and provisions and if they identify any actual or potential violations (e.g. non-compliance with the Code of Conduct, policies and procedures, Sarbanes-Oxley and financial statements matters, employee relations, abuses, discrimination, corruption, theft, money laundering, any misconduct which could harm the company's reputation or any attempts to conceal any of the above), they can report them to their immediate manager or via telephone or regular mail, as well as by fax or e-mail. In cases where employees fear of serious personal, professional or social harm, they can anonymously report violations, through any of the following communication channels:

- Send a mail to: One Telecommunications sha., Legal, Regulatory, Compliance and Data Privacy Department, Rruga Vangjel Noti', Laprake, Tirana, Albania.
- Send an e-mail to: <u>complianceoffice@one.al</u>.
- Contact the number: +35542275276 (Monday to Friday, 9 AM 5 PM).
- Use the Electronic Whistle-blowing Form at: <u>https://www.one.al/whistleblowing_eng/</u>.

In any case, the company:

- Protects the confidentiality of anyone who reports any violations.
- Ensures that all information submitted are handled and investigated only by specially trained individuals.
- Ensures that there will be no direct or indirect retaliation for the whistle-blower who, on good will, reports any violations.

During 2020, there were no employees' inquiries and no reports or complaints raised through the respective communication channels.

No violation cases concerning our Code of Conduct

occurred

B. Upholding corporate governance principles

∨ Good Practice... Prohibiting Gifts and Donations

One Telecommunications' Code of Conduct strictly prohibits employees to offer, promise or grant illegal benefits to national or international public officials or to decision-makers in the private sector, in order to achieve preferential treatment or to influence a decision. At the same time, employees are not allowed to be influenced or accept any offers by suppliers or request illegal offers from our suppliers, in order to gain illegal advantages.

In cases of doubt whether or not accept a gift or in cases of accepting a gift (other than flowers, sweets, drinks, coffees and music CDs/DVDs) of over €150 per calendar year per business partner, an invitation to a business meal or to an event from a customer or supplier, employees can consult their direct supervisor and the Compliance Officer, based on the Policy of Accepting and Granting of Benefits. Likewise, if there are any illegal gifts or benefits from or to our



employees, they are required to inform their immediate managers or report the incident through the appropriate communication channels.

During 2020, there were no cases raised through the respective mechanisms related to accepting or granting gifts and offers or any other benefits.

One Telecommunications complies with the legal requirements as defined by the Government of Albania, Telecommunication Supervisory Authority and other legal institutions regarding corporate governance. At the same time, the company complies with well-recognized national rules of corporate behaviour and adheres to the corporate governance principles determined by the Corporate Governance Code for unlisted joint-stock companies in Albania.

General Shareholders Assembly: The General Shareholders Assembly is the highest-ranking governance board of One Telecommunications and is responsible to take decisions for important corporate issues, according to Law no. 9901/14.04.2008 'On Traders and Trading Companies'.

Supervisory Council: The Supervisory Council is responsible to:

- Ensure that the company's activities and operations comply with laws and the respective legislative provisions.
- Review and monitor any actual or potential situations of conflict of interest and legislative compliance.
- Receives all notices of actual or potential conflict of interest that BoD members may have.
- Supervise BoD's activity.

Supervisory Council

Name	Role	Executive member	Term start date	Term end date
Paulina Ivanova Dobreva	Chairman	Х	06/11/2020	06/11/2023
Pëllumb Kallaba	Member	Х	07/05/2019	07/05/2022
Aigest Milo	Member	Х	01/01/2021	07/05/2022

Board of Directors: The Board of Directors (BoD) meets at least quarterly and is responsible to define One Telecommunications' general policies and strategy, as well as supervise the company's operational management and overall activity.

Board of Directors

Name	Role	Executive member	Term start date	Term end date
Ralitsa Agayn-Guri	Chairman	Х	14/05/2019	07/05/2022
Emil Petkov Georgakiev	Chief Executive Officer (CEO)	٧	07/05/2019	07/05/2022
Borislav Nikolaev Borisov	Chief Finance Officer (CFO)	٧	07/05/2019	07/05/2022
Sokol Nela	Member	Х	07/05/2019	07/05/2022

• As described in company's statue, the BoD consists of four members for a three-year term and each BoD member can be re-appointed.

- The Chief Executive Officer (CEO) is responsible for the company's operational management.
- Employees may bring economic, environmental and social issues to the attention of the BoD through the formal dialogue of Top Management with employee representatives and the formally established processes (e.g. environmental issues are reported to the Environmental Management Team, which reports directly to the Top



Management). However, it must be noted that there were no critical concerns communicated to the BoD within 2020.

- Wages and other compensation of BoD members are defined according to General Shareholders Assembly's decisions.
- The General Shareholders Assembly approves the employment contracts of Executive Directors, which define their compensation, including performance-related compensation procedures.
- BoD members are nominated and appointed by the Supervisory Council, whose members are appointed by the General Shareholders Assembly. At the moment, there are no diversity factors considered for their nomination in pursuance to the Albanian Law requirements.
- At the moment, there are no BoD Committees to support and assist the Board of Directors.

C. Conducting Internal Audits

The Internal Audit function is established and operates in accordance with the company's Articles of Association, the Internal Audit Charter and complies with the 'International Standards for the Professional Practice of Internal Auditing', as published by the 'Institute of Internal Auditors' (IIA). Furthermore, the company's Code of Ethics governs the minimum requirements for the conduct, behavior and expectations from internal auditors while performing their duty, with main responsibilities being:

- Perform internal audits in all corporate functions following an Annual Internal Audit Plan.
- Assess the System of Internal Controls' efficiency and effectiveness.
- Audit specific activities according to management requests.

In 2020, 8 audits were conducted resulting in 58 management actions, aiming to improve the current control environment.

2. Risks, Compliance and Business Continuity

A. Identifying and managing risks

Technology advancement and proliferation of technological innovation, as well as globalization of economies, have set corresponding challenges for the telecommunications sector. Due to the nature of the sector's activities, One Telecommunications is exposed to certain risks, which can be outlined below:

Category	Description	
	Long-term effects on brand and reputation or delivery of strategic corporate objectives	
Strategic	Effect on brand and reputation due to negative media reports	
	Impact to delivery of strategic initiatives and strategic priorities	
	Economic impact on company's revenues, corporate assets and market share	
Financial	Market price changes based on currency exchange rates, interest rates, liquidity and commodities	
	Possibility that a borrower or counterparty will fail to meet its obligations in accordance with agreed term	
	Delayed payment of customer obligations	

Risks



	Intense competition in the telecommunications sector
	Supply chain impact (i.e. negative impact on operating service level, time to market delays due to over dependency on a specific supplier, internal inefficiencies in purchasing and logistics cycles)
Operational	IT systems' service and availability (i.e. critical IT systems failure, service unavailability)
	Conditions which affect network quality and availability (i.e. unavailable network to subscribers, low call quality)
Regulatory	Regulatory decisions, which could adversely affect the company's business and financial situation
Legal and Compliance	Violations of legal provisions, internal regulations and guidelines by institutions or company employees
	Conditions which affect normal working operations and work-life balance
Labour	Health and Safety hazards of employees engaged in work activities of the supply chain, especially for high-risk job profiles such as climbers, electricians and call center operators
	Economic and social inequalities regarding access or use of telecommunication services (digital divide)
Social	Breaches of network security and information systems, which can result to access to personal and sensitive data
	Use of telecommunications services with physical and non- physical hazards to children
Environmental	External environmental conditions for business continuity (e.g. earthquakes, floods)
	Environmental impact caused by the company's activities (generation of hazardous waste and other associated materials, consumption of natural resources, CO ₂ footprint)

B. Contributing to anti-corruption

∨ Good Practice... Compliance Committee

In order to ensure our effective operation, we have established the Compliance Committee to support regarding Compliance and Corporate Governance issues. The Committee:

- Defines the Compliance-related strategic issues.
- Observes Compliance best practices.
- Determines and monitors the implementation of programs for the Compliance Management System's (CMS) effective operation.
- Ensures the effective communication of the CMS's implementation to employees and Management and authorizes the Compliance Office to implement an overall communication plan (e.g. employee questionnaire, articles in corporate Intranet and newsletters, meetings, workshops). Furthermore, the Compliance Office communicates the annual CMS reports to employees and Management, which include issues such as compliance cases, improvement of CMS, status of Compliance Risk Assessment measures (Annual Compliance Program), as well as statistics on trainings and operation of the respective mechanism for employees to seek advice and report violations.





- Discusses and approves the annual plan or strategy submitted by the Compliance Officer, in co-ordination with respective Managers to minimize risks at operational level.
- Supports and approves actions proposed by the Compliance Officer such as measures for recommended enforcement, remedial actions, settlement and conciliation agreements, in order to eliminate unlawful employment practices and secure appropriate individual relief related to Code of Human Rights breaches (e.g. regarding health and safety, freedom of association and right to collective bargaining, non-discrimination, disciplinary practices, avoidance of child and forced labour).
- Supports company business units on analyzing their procedures, in order to identify any risks and proposes a Measure Plan to mitigate relevant risks.
- Assigns responsibilities to Chief Officers, Directors, Department Managers and Head of Offices after the Compliance Officer submits his reports, regarding conducting investigations of non-compliance related tip-offs, monitors the investigations' implementation and completion and recommends appropriate measures and sanctions to business units in case of misconduct, within the context of the CMS Program.
- Reviews reports and results of Compliance procedures and assesses the completeness, correctness and accuracy of reports submitted by the Compliance Officer at least semi-annually to Chief Officers, Directors, Department Managers and Head of Offices for approval.
- Submits briefings/reports to the competent corporate bodies regarding Compliance issues.
- Proposes measures/procedures/policies to the competent corporate bodies within the areas of its responsibilities.

The Chairman of the Committee is the Chief Executive Officer, who may authorize another official of his business unit to act as deputy, and the Committee members are:

- The Chief Financial Officer.
- The Compliance Officer.
- The Head of Internal Audit.
- The Human Resources Manager.
- The Manager of Corporate Affairs.

All Committee members may authorize another official of their respective business unit or another Committee member to act as their deputy.

Within the context of our efforts to combat and eradicate corruption, the company implements policies and practices to effectively prevent and tackle corruption:

- We have communicated our anti-corruption policies and procedures to all employees through our corporate Intranet.
- Employees sign the individual 'Compliance Statement' where they confirm to be aware and accept all Compliance Policies.
- We have adopted Integrity Checks prior to initiate collaboration with new suppliers (see Subsection III-5B).
- We require that BoD members and Senior Financial Officers sign individual statement to declare that they are informed and comply with the Code of Ethics for Senior Financial Officers' provisions, which are submitted to the Compliance Office.
- All employees have signed the Conflicts of Interest Statement, which is aligned with the Policy on Avoiding Corruption and other Conflicts of Interest.
- We organize awareness campaigns for our employees regarding anti-corruption, without 2 on-air compliance campaigns related to Granting Gifts & Compliance rules conducted in 2020.
- Our Internal Audit and Compliance Office thoroughly investigates any actual or potential cases of corruption, through clearly defined criteria.
- We require sufficient degree of detail in any allegations regarding actual or potential cases of corruption, in order to initiate investigation.



Anti-Corruption Training Program				
2017 2018 2019 2020				
Targeted employees (number)	51	348	0	0
Employees trained (number)	45	292	0	0
Participation rate (%)	88	84	0	0

It must be noted that within 2020, there were:

- No public policy positions and participation in public policy development and lobbying.
- No incidents of corruption.
- No legal actions or pending legal cases related to corruption and fines or other non-monetary sanctions imposed by the respective authorities.

We had no incidents of corruption

C. Maintaining compliance

One Telecommunications has adopted and implements a Compliance Management System (CMS) to ensure that all Directors, managers and employees comply with the legislation in force, the Code of Conduct and internal policies with the following main elements:

- Prevention of misconduct and compliance with the policies provided by the CMS to protect company and employees from any legal consequences avoid risks and reduce reputational risks. Within this context, the company trains employees on the dangers imposed by misconduct and violations (e.g. corruption, fraud, misuse of personal data) and has developed appropriate channels for employees to submit their questions regarding the Code of Conduct and policies' implementation.
- Detection of compliance violations and response to them.

The CMS defines employees' responsibility boundaries and the behavioural rules required to avoid legal implications and potential conflict of interests, with the following applied Policies and Codes:

- Code of Conduct.
- Whistle-blowing Policy.
- Code of Ethics for Senior Financial Officers.
- Supplier Code of Conduct.
- Policy on Insider Trading.
- Donation Policy.
- Sponsoring Policy.
- Policy on Accepting and Granting of Benefits.
- Anti-Fraud Policy.
- Event Policy.
- Policy on Avoiding Sexual Harassment.
- Policy on Avoiding Corruption and Other Conflicts of Interest.
- Policy on Employee Relations.

One Telecommunications' CMS:

- Is certified in accordance with ISO 37001:2016 (Anti-Bribery Management System) and has received an attestation as per ISO 19600:2014 (Compliance Management Systems) by an independent certification body.
- Is reviewed by independent external auditors to confirm the effectiveness of its procedures.
- Has been certified by independent auditors in 2013 and 2016, according to the German Institute of Public Auditors (Institut der Wirtschaftsprüfer) Assurance Standard 980 (IDW AssS 980). The audits were mainly focused on anti-corruption and demonstrated the CMS's effectiveness to identify corruption risks and prevent violations.



D. Complying with legislation

V Good Practice... Prohibiting Political Involvement

One Telecommunications' Code of Conduct firmly dismisses any monetary donation or granting any monetary valueadded benefits to political parties or elected public officials. The company has established transparent procedures regarding sponsoring of State institutions and bodies, which can verify the associated marketing effect (e.g. clearly indicating the company as a sponsor). It must be noted that in 2020, no donations were made to politicians, pubic officials and political parties.

We closely monitor the regulatory and legal framework related to our activities, in order to apply its relevant provisions. It must be noted that within 2020, there were no written notices regarding compliance issues by respective authorities or relevant legal cases, while no fines or other non-monetary sanctions were imposed for non-compliance with laws and regulations.

E. Ensuring business continuity

One Telecommunications recognizes its legal commitments, as well as its responsibility, to maintain stable growth and a continuous supply of quality telecommunication services. Therefore, the company strives to ensure its business continuity, in order to secure prompt and efficient recovery of essential operations from any incident or physical disaster. For this reason, we:

- Have established a framework and supporting plans to apply a consistent and systematic method to identify threats and incidents, as well as a common process to assess their potential or actual impact and the respective persons to inform and manage any adverse situation.
- Have developed our Business Continuity Management Policy and Business Continuity Management Framework Policy, which have been uploaded on our corporate Intranet.
- have established the Information Security & Business Continuity Management Steering Committee, which consists of:
 - The Chief Executive Officer, as the Committee's Chairman.
 - The Chief Financial Officer.
 - The Chief Commercial Officer.
 - o The Chief Legal Regulatory Compliance & Data Privacy Officer.
 - o The IT Director.
 - The Network Director.
 - o The Information Security & Business Continuity Management Officer.
 - The Internal Audit Officer.
- Have created a Crisis Management Team, which is responsible for decision-making and management of activities to mitigate the adverse effects of crisis events.
- Have defined an Incident Response Structure and have informed and properly trained its members to their role through various exercises and drills.
- Design the appropriate Business Continuity Strategies through regular Business Impact Analyses, during which we assess the impact over time of any interruptions to our activities, as well as Risk Assessments, through which we identify, analyze and assess potential threats that could interrupt our business activities and apply proper measures to mitigate or eliminate the associated risks.
- Have developed Business Continuity Plans with documented priorities, procedures, responsibilities and resources.
- Have communicated our policies, procedures and activities related to business continuity to all employees, as part of the induction sessions for new hired employees and uploads on our corporate Intranet.
- Regularly organize awareness and training sessions, in order to ensure that our employees are aware and understand the respective structure and objectives.
- Have adopted and implement a Business Continuity Management System (BCMS), aligned with the ISO22301 international standard, which emphasizes the importance to:
 - Understand the organization's and Stakeholders' needs in terms of Business Continuity.
 - Implement and operate the necessary controls and measures to deal with interruptions in our operations.
 - o Implement a systematic approach to manage the Business Continuity Management process.
 - Continuously monitor and review the Business Continuity Management System's performance and effectiveness.



Within 2020, we:

- Updated and approved the corporate Business Impact Analysis Document, as well as the Business Continuity Management Framework and Policy.
- Removed the dedicated BCM function from the Corporate Affairs Department and assigned to the Information Security and Business Continuity Management Office.
- Organized Business Continuity Management sessions for employees, as part of Information Security training sessions.
- Organized several relevant induction training sessions for all new employees.
- Conducted evacuation drills in our facilities in Lapraka and Kashar.

3. Corporate Responsibility Management

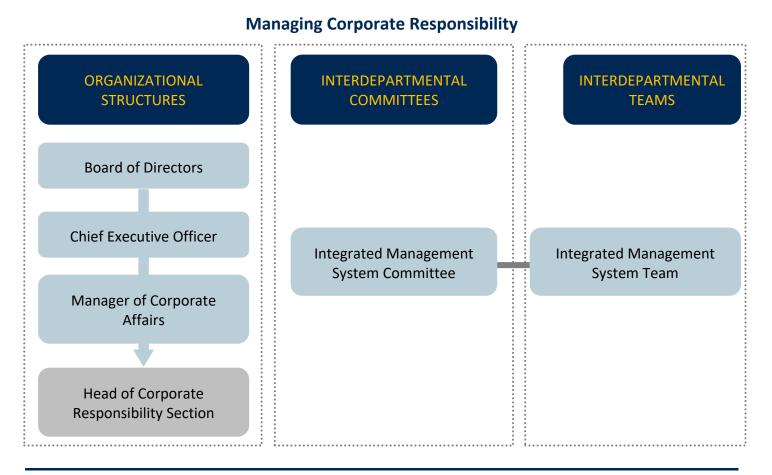
Corporate Responsibility for One Telecommunications

'Corporate Responsibility is the commitment of the company to contribute to global sustainable development, by taking economic, ecological and social objectives into consideration in our decision-making processes, to take responsibility for the impact of our organization's activities, by working and communicating with internal and external stakeholders, while at the same time improving the competitiveness of the company.'

A. Utilizing appropriate organizational structures

One Telecommunications' understanding of Corporate Responsibility aims to align its business operations with its Stakeholders' needs and facilitate a homogeneous culture by its employees, as well as create value for all its Stakeholders.

The company has established suitable organizational structures to manage Corporate Responsibility at a strategic, organizational and operational level. The same structure is also used for data collection, in order to report our performance to shareholders.



Corporate Responsibility Report 2020



- The overall responsible for Corporate Responsibility issues is the Chief Executive Officer, who seeks the respective input from the BoD, as part of the annual review of strategic objectives.
- The Manager of Corporate Affairs reports directly to the CEO and is responsible to develop and implement the company's Corporate Responsibility strategy, as well as cooperate with the CEO on Corporate Responsibility strategy issues and initiatives and with the interdepartmental Committees to ensure proper implementation of related programs.
- The Head of Corporate Social Responsibility Section is responsible to support the Corporate Responsibility strategy's implementation, coordinate and manage Corporate Responsibility activities throughout the company, collect and process the respective data, monitor the implementation of related measures and targets and communicate the company's Corporate Responsibility performance to external and internal Stakeholders.
- At the same time, we have established the interdepartmental Integrated Management System Committee to facilitate proper implementation of issues related to quality, health and safety and environment, which are incorporated into our Integrated Management System (IMS), as well as the interdepartmental Integrated Management System Team to ensure application of our policies and coordinate operational activities.

B. Operating based on Management Systems

In 2012, One Telecommunications became the first company in the telecommunications market in Albania to hold a triple ISO certification for its integrated Management System (IMS) on Quality, Environment and Occupational Health & Safety, based on ISO 9001, ISO 14001 and OHSAS 18001 respectively, in order to respond to long-term challenges. Since 2017, One Telecommunications has certified its Anti-bribery Management System and Compliance Management System according to the ISO 37001 and ISO 19600 respectively, as part of the Integrated Management System, leading to integrate management structure into one Committee, one team and one internal audit. Despite the challenging situation related to our operation and the COVID-19 pandemic, which affected the way many of our management systems operate, we managed to demonstrate high flexibility degree to adapt to these conditions and maintained all existing standards.

Within 2020, we:

- Applied Lean Transformation for Process Improvement to enable continuous practical changes and improve the way we work, through value-driven purposes and growth mindset approach for capability development and improvement for all people at all levels.
- Were subject to external certification audits by TUV Austria Albania for ISO 37001 and ISO 19600, as well as surveillance audits for ISO 9001, ISO 14001, OHSAS 18001 and ISO 31000.
- Trained 3 new employees on the internal assessment of our Management System, regarding the Quality Management system, Environment Management System and Health & Safety Management System respectively.

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We had no non-conformities from audits regarding the operation of Management Systems

4. Stakeholder Engagement and Materiality Analysis

Your Opinion... Responsible Operation

According to a survey conducted to 1,200 citizens in February 2021, 71% of our users and 31% of total participants believe that we are the mobile operator who acts most responsibly, with a high evaluation score in all areas of responsible operation. What is also important is that our own customers consider responsible operation in all areas to be much more important than what users of other mobile operators consider them to be:



Area	Evaluation of One Telecommunications (on a 5 point scale)	Importance of Responsibility to our own Customers vs second best operators' Customers
Protecting the Environment	3.6	+0.9%
Caring about its Employees	3.8	+1.5%
Respecting its Customers	3.8	+1.1%
Supporting the Communities	3.6	+2%
Controlling Suppliers	3.5	+0.2%
Operating Ethically	3.8	+2.2%

A. Focusing on five main Areas to operate responsibly

Our company transforms its commitment to operate responsibly into action and focuses on the following five main Areas, in order to respond to our Stakeholders' long-term needs and expectations.

Strategy & Management

Our objective is to incorporate responsibility into our business operations and daily management activities, as well as create measurable and tangible results to create value for our Stakeholders.

Customers & Suppliers

Our objective is to develop products and services which are safe and correspond to the needs of our customers, as well as facilitate the responsible operation of the markets where we conduct our business.

Society

Our objective is to combine our business success, with prosperity and quality of life, for citizens in local communities we conduct our business in.

Employees

Our objective is to create a work environment, which ensures long-term career opportunities and facilitates our employees' development.

Environment

Our objective is to successfully manage our direct and indirect environmental impact, as well as raise our fellow citizens' awareness to act more responsibly regarding environmental protection.

These Areas compose our Corporate Responsibility Framework, which is used by our company to manage systematically all respective subjects linked to our business operation and formulate concrete strategic objectives.



Corporate Responsibility Framework			
	EXTERNAL		INTERNAL
Customers & Suppliers Positively influence the markets we operate	Society Support society beyond financial aid	Environment Reduce our environmental impact	Employees Create a safe, fair and engaging work environment
 Responsible Competition Responsible Marketing & Coms Customer Service & Satisfaction Data & Information Security Procurement & Supplies 	 Economic Value Distributed Digital Divide Social Products & Services Social Contribution & Support 	 Strategy & Management Energy & Climate Change Materials & Waste Electromagnetic Fields Other Impacts 	 Employment & Engagement Health, Safety & Security Fairness & Diversity Training & Development Life at Work & Rights
Strategy & Management Operate responsibly for our Stakeholders			
Corporate Governance	Risks, Compliance & Bus	iness Continuity Corporate	Responsibility Management

B. Identifying Material Topics

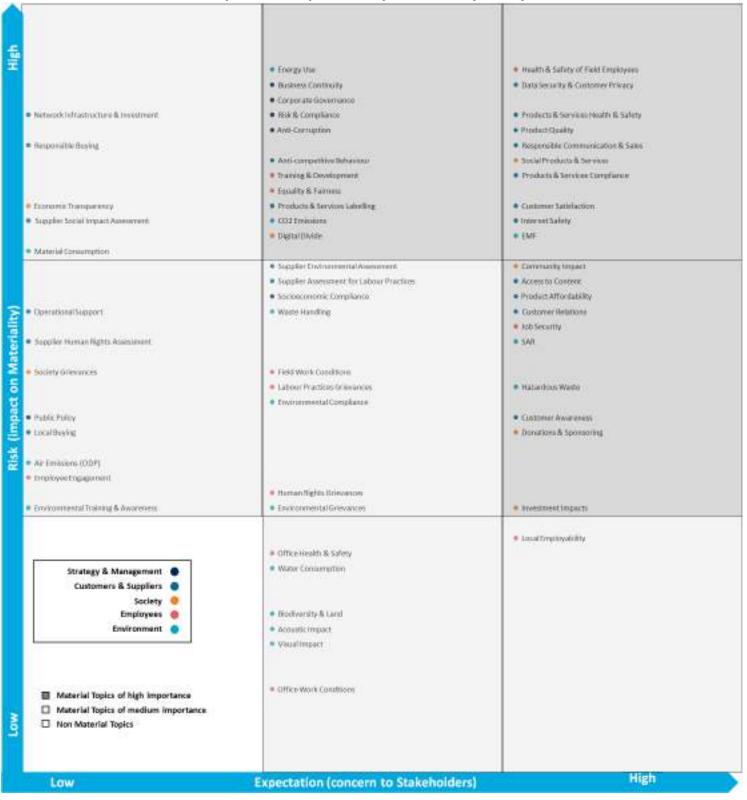
As a result of a Materiality Analysis, the company focuses on Material Topics in each of the above Areas. In order to identify them, One Telecommunications reviewed potential topics, based on the sector's regulatory environment, current conditions and practices worldwide, as well as future trends. In total, we reviewed over 90 topics, which were prioritized afterwards according to:

- The level of impact on the company, were we examined the economic, environmental and social impacts of our activities, products and operations.
- Our Stakeholders' expectations, where we identified key requirements of our Stakeholders related to Corporate Responsibility issues. Although, at the moment, we do not conduct a full-scope Stakeholder Engagement Survey on Corporate Responsibility issues, we utilize relevant input from various surveys (such as the quarterly Social Responsibility Surveys), as well as indirect input from the company's departments which interact with each Stakeholder group.

We used the Materiality Analysis to determine the Corporate Responsibility Report's content (following GRI's 4 Report Content Principles) and the Topics' scope (boundaries), without any significant changes compared to the previous period (e.g. regarding Material Topics). The Materiality Analysis was approved by the Corporate Responsibility Section within the Corporate Affairs Department and has been included in the present Corporate Responsibility Report. Through the Analysis, we have identified the following Material Topics for 2020 (all Topics that were not deemed Material are not mentioned in detail):



Corporate Responsibility Materiality Analysis

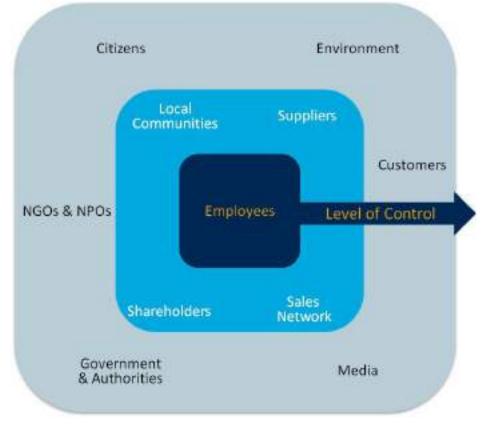


C. Interacting with our Stakeholders

We define Stakeholders as anyone who directly or indirectly influences or is influenced by our activities and operations. As these groups require not only transparency but also active involvement of companies in issues related to society development and environmental protection, we systematically identify our Stakeholders' expectations and questions, in order to effectively respond to them.



Stakeholder Categories



The following table describes our Stakeholder groups, methods we apply to have a dialogue with them and their frequency, main issues of interest related to Corporate Responsibility, as well as the respective Sections in this Report, where our related programs and answers to these issues of concern can be found. The Corporate Affairs Department is responsible to coordinate the interaction between One Telecommunications and its Stakeholders on issues related to Corporate Responsibility, which is a process that actively involves the entire company, as it is conducted throughout the year, without distinct activities taking place as part of the Report preparation process:

Stakeholder Engagement

Stakeholder	Methods of interaction through continuous and ongoing activities (unless indicated otherwise)	Main issues of interest	Section in this Report
Customers (retail and business)	 Sales network (frequent regional conferences) Customer Service Center Customer Satisfaction Survey (quarterly) Tracking Studies for retail customers (annually) Tracking Studies for business customers (annually) Call Centers Social media Website 	 Data Security & Customer Privacy Product Quality Customer Satisfaction Anti-competitive Behaviour Internet Safety EMF Responsible Communication & Sales Access to Content Product Affordability 	Customers & Suppliers: III- 1B,2A-2C,3A-3C,4A-4C,5D Environment: VI-4A,4B





		 Customer Relations SAR Customer Awareness Products & Services Labelling 	
Sales Network	 Customer Satisfaction Survey (quarterly) Information systems Verbal communication Interaction 	 Product Quality Customer Satisfaction Products & Services Compliance Responsible Communication & Sales Products & Services 	Customers & Suppliers: III-2A- 2C,3A-3C,4C,5D
Suppliers	 Procurement activities Contracts Meetings Corporate announcements Press releases 	 Labelling Supplier Assessment for Labour Practices Supplier Environmental Assessment Local Buying Responsible Buying Operational Support Supplier Human Rights Assessment Supplier Social Impact Assessment SAR 	Customers & Suppliers: III-5A- 5D
Government & Authorities (e.g. AKEP)	 Consultations on regulatory framework Formal communication Business meetings and reports Cooperative projects Dialogue with representatives at local and national level 	 Data Security & Customer Privacy Anti-Competitive Behaviour Products & Services Compliance Internet Safety EMF Responsible Communication & Sales Digital Divide Corporate Governance Risk & Compliance Business Continuity Anti-corruption Socioeconomic Compliance Public Policy Network Infrastructure & Investment Economic Transparency 	Customers & Suppliers: III- 1B,2A-2C,4A-4C,5D Environment VI-4A Society: IV-1A,2B Strategy & Management: II-1A 1C,2A-2E Introduction: I-4B
Employees	 Employee Engagement and Satisfaction Surveys (semi- annual) Trainings Performance Appraisal (annual) Informative publications Events 	 Economic transparency Health & Safety of Field Employees Equality & Fairness Job Security Labour Practices Grievances Local Employability 	Employees: V-1B,2A,2B,3A- 3C,4A,4B,5A-5C Environment: VI-5F

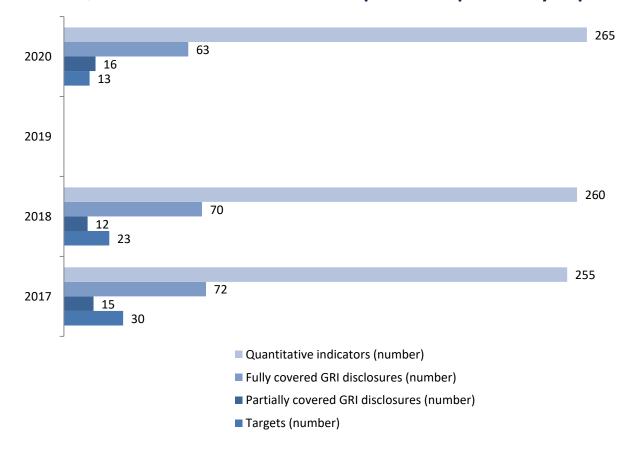


	 Meetings Volunteer activities Website Intranet OneHR Portal E-mails 	 Training & Development Field Work Conditions Employee Engagement Office Health & Safety Office Work Conditions Human Rights Grievances Environmental Training & Awareness 	
Local Communities	 Dialogue with local representatives Visits Local events, festivals and projects Meetings 	 Social Products & Services EMF Community Impact Hazardous Waste Donations & Sponsoring Investment Impacts Local Employability CO₂ Emissions Waste Handling Environmental Compliance Environmental Grievances Acoustic Impact Visual Impact Society Grievances Air Emissions (ODP) 	Society: IV-3A,4A,4B,4D Employees: V-1B Environment: VI- 1C,2F,3A,3C,3D,4A,4B,5A,5B,5E
Citizens	 Social Responsibility Surveys (quarterly) Website Social media 	 Data Security & Customer Privacy Social Products & Services Internet Safety Digital Divide Energy Use Material Consumption CO₂ Emissions Network Infrastructure & Investment 	Customers & Suppliers: III-4A- 4C Society: IV-2B,3A Environment: VI-2A-2D,2F,3A- 3C Introduction: I-4B
Non- governmental organizations (NGOs) & Not- for-profit organizations (NPOs)	 Meetings Collaborations 	 Data Security & Customer Privacy Equality & Fairness Internet Safety EMF Digital Divide SAR Labour Practices Grievances Hazardous Waste Energy Use Waste Handling Environmental Compliance 	Customers & Suppliers: III-4A- 4C,5D Society: IV-2B,4D Employees: V-3B,3C Environment: VI-1C,2A- 2D,3A,3C,3D,4A,4B,5C,5D

		 Environmental Grievances Water Consumption Biodiversity & Land Society Grievances Human Rights Grievances 	
Media	 Corporate announcements Press conferences Press releases Informative publications Meetings Website Information upon request 	All above	Strategy & Management: II-1-2 Customers & Suppliers: III-1-5 Society: IV-1-4 Employees: V-1-5 Environment: VI-1-5
Shareholders	 General Shareholders Assembly Meetings Financial reports Adoption and utilization of policies and principles 	All above	Strategy & Management: II-1-2 Customers & Suppliers: III-1-5 Society: IV-1-4 Employees: V-1-5 Environment: VI-1-5

D. Focusing on quantitative results

One Telecommunications strives to include quantitative indicators and targets in its Report, in order to be transparent to its Stakeholders, as indicated in the following graph.



Quantitative Data within the Corporate Responsibility Report

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We increased by 1.9% the number of quantitative indicators we make reference to within the Report

5. 2020 Achievements and Future Targets

We will	Ву
Redefine KPIs and targets based on introduction of new operating systems and redesign/automation of daily operations and procedures	2021
Further develop our Integrated Management System and certify according to BS PAS 99:2012 System Certificate	2021
Achieve external certification of our Information Security Management System	2021

III. OUR CUSTOMERS & SUPPLIERS

Introduction and Summary

Our Size:

1.4 million customers

99.8% population coverage (GSM coverage)

85.4% of complaints resolved within 5 days

448 suppliers

48% spending on local suppliers

Our Objective:

To develop products and services which are safe and correspond to the needs of our customers, as well as facilitate the responsible operation of the markets where we conduct our business.

Our Achievements:

- We reduced the drop call rate on our 2G network by 37.9% and data drop rate on our 4G network by 50%.
- We resolved 85.4% of complaints received within 5 days.
- We had no incidents regarding customer privacy issues or loss of personal data.
- We conducted Information Security Sessions to 27 employees and 100% of new hired employees.
- We successfully blocked over 16,000 Internet security threats.
- We increased the percentage of procurement expenses from local suppliers to 48%.
- We communicated our Supplier Code of Conduct to all our suppliers, with 100% of them signing its acceptance.





1. Responsible Competition

igsircup Your Opinion... Choice

According to a survey conducted to 1,200 citizens in November-December 2020, 1 of 3 of our customers chose us because we offer the best price.

A. Operating within the regulatory framework

The Electronic and Postal Communications Authority (AKEP) is the regulatory authority regarding electronic communications and postal service, which supervises the regulatory framework in the respective areas (as defined by Law) and the development policies (as defined by the Council of Ministers).

Since One Telecommunications is designated as a significant market power (SMP) in the wholesale markets, the company follows AKEP's respective regulatory obligations, which can be summarized below. These obligations often have a substantial impact on its activities and operations, such as the obligation of price control (setting a national mobile and fixed termination rate and SMS termination rate), which directly affects the wholesale interconnection prices in traffic measurements between One Telecommunications and other mobile and fixed operators.

Regulatory Obligations per Market					
Markets	SMP Undertaking	Regulatory obligations			
Retail mobile market (residential and non-residential)	One Telecommunications	 Non-discrimination on-net/off net (minutes and rates) 			
Wholesale fixed termination market	One Telecommunications	 Non-discrimination Transparency (no obligation for publication of Research Ideas and Outcomes – RIO) Access and Interconnection Price Control 			
Wholesale mobile call termination market	One Telecommunications	 Non-discrimination Transparency (RIO publication) Cost orientation Access and Interconnection Price Control 			
Wholesale mobile SMS termination market	One Telecommunications	 Non-discrimination Transparency (no obligation for RIO publication for SMS) Access and Interconnection Price Control 			

Regulatory Obligations per Market

Within 2020:

- There were no written notices from AKEP for non-compliance with its decisions and One Telecommunications did not file any complaints against AKEP's decisions.
- One Telecommunications was not filed with any lawsuits, recourses, appeals or other legal actions related to its operation.
- There were no fines or other non-monetary sanctions imposed by AKEP.
- Regarding a previous administrative complaint filed to AKEP from Neofone regarding an increase in international mobile termination rates as part of the interconnection contract with One Telecommunications (which has been rejected by AKEP) and a respective legal action sent to the First Administrative Court on September 2017, with a following specification on November 2017, the lawsuit was rejected. Neofone has challenged the First





Administrative Court's decision in front of Tirana Administrative Court of Appeal, with no hearing date decided at the moment.

B. Abiding by fair competition rules

We recognize the importance of fair competition, since it promotes efficiency, economic development and innovation. Within this context, we:

- Comply with national legislation and regulation in the Albanian telecommunication market, as outlined mainly in Law no. 9121/28.07.2003 'On competition', which aims to protect free and fair competition, as well as the respective Presidential Decrees, Ministerial Decisions and Decisions from independent administrative authorities, such as the Albanian Competition Authority (CAA).
- Comply with the specific regulation related to issues, such as licensing, tariffs, local loop unbundling, interconnection, leased lines and universal service, as well the Law no. 9918/19.05.2008 'For electronic communication in the Republic of Albania', which regulates the company's activities.
- Have signed the Committee of Customer Protection's and AKEP's Code of Conduct related to the protection of customers as a self-regulatory initiative, which states the main principles of fair competition in the electronic communications market.
- Conform to the principles of fair competition for all our operations.
- Support fair dealing with our business partners and competitors.
- Do not engage in price fixing or illegal attempts to gain market influence.
- Do not disseminate false information about our competitors' products or services.
- Do not utilize unfair means to gain a competitive advantage.
- Do not use industrial espionage to obtain information about market competitors.
- Do not unnecessarily communicate information from and about the company to any third parties.
- Train managers and directors on competition law and the application of the Anti-Trust Policy requirements, as part of the Annual Compliance Classroom Training, without however conducting any relevant training in 2020.

Within 2020, there were:

- No complaints for anti-competitive behaviour on behalf of One Telecommunications.
- An Albanian Competition Authority's preliminary investigation procedure in the mobile retail market during the
 period 11/2019-03/2020 due to suspicions related to coordinated attempts among companies on the occasion of
 new 30-day prepaid standard bundles launched concurrently and unjustifiably at raised prices. The investigation
 concluded that this action constituted coordinated behavior on behalf of mobile operators, according to the
 respective Competition Law provisions. All mobile operators (including One Telecommunications) submitted their
 commitments on the Competition Authority's decision, which were approved by the Authority as mandatory in
 the form of terms and obligations, and therefore concluded the preliminary investigation procedure.
- No fines or other non-monetary sanctions for anti-competitive behaviour or anti-trust practices imposed by the respective authorities.
- No complaints filed by One Telecommunications for anti-competitive behaviour on behalf of other operators.

2. Responsible Marketing and Communication

$^{\mathcal{Y}}$ Your Opinion... Brand Opinion

According to a survey conducted to 1,200 citizens in August 2020, 73% of participants have the most positive opinion about our company, the highest among mobile operators in Albania.

A. Applying Responsible Marketing practices

V Good Practice... Responsible Communication

According to our Code of Conduct, we consider the long-term impact of customers to our operations and we commit to ensure that communication and interaction with our customers adheres to the respective regulations and ethical standards. Therefore, we only call our customers for promotional reasons during hours permitted by law and we don't recommend any products or services that our customers do not need.





Our communication material is legal, appropriate, fair, sincere, corresponds to reality and respects peoples' diversity, in terms of age, gender, race, religion and physical or mental status. Within this context:

- We comply with the contractual obligations regarding communication and marketing activities as defined by the Audio Visual Media Authority, AKEP and the Competition and Consumer Protection Authority.
- Our Marketing Communications Department reviews all promotional material (e.g. advertising messages and campaigns), as well as network communications (e.g. SMS, notifications) before publicly launching them, in order to ensure proper implementation and compliance.
- Our Legal Department reviews crucial materials and confirms their compliance with applicable laws and legislative provisions.
- We do not sell or provide any products and services which are either banned or disputed in foreign markets.

In 2020, there were:

- No cases of non-compliance with regulations and voluntary codes concerning marketing, advertising, promotion, product and service information and labeling.
- No cases of campaigns being withdrawn (after their initial release).
- No investigations or legal actions for non-compliance concerning marketing, advertising, promotion, product and service information and labeling.
- No relevant fines or other non-monetary sanctions imposed by respective authorities.

B. Providing information for our services

We communicate with clarity and transparency on our services, pricing policies and charges, as well as contractual conditions.

Published Information

Information on our website
Reference interconnection offer
General conditions of subscribers' contract
Service level agreement
Indicator of mobile service quality
Indicator of fix service quality
SMS termination tariffs
SMS termination decision
Conditions and terms of use

C. Ensuring transparent pricing practices and affordability of our services

We strive to offer reduced prices or discounts to contribute in our own way to the difficult financial condition many of our fellow citizens face due to the current economic environment. At the same time, we proactively review handset prices and provide a variety of bundles/offers to our subscribers, taking into account market trends, dynamics and competition, in order to meet their demands and needs and provide the most competitive options in the market.

Pricing information: One Telecommunications provides extensive pricing information about its products and services in its website and respective advertising materials, as well as through its customer service centers. These include information about pricing of products and services, tariff options and charges (e.g. fees, prices). Customers can control or receive information on their use and pricing through various channels, which include:

- USSD menu.
- IVR.
- The mobile application.





- Our website.
- Our shops.

Furthermore, we publicly notify all changes in tariffs of services or new tariffs or their amendments at least 7 days before their implementation, which has to last at least 3 days in succession, except in cases of price reductions, where changes can be done immediately. At the same time, we notify subscribers for any modification at least 30 days before their implementation and inform them about their right to refuse the new terms and conditions and end their contract without any further penalty.

Development of roaming services: One Telecommunications has established agreements with 394 operators worldwide and the company's post-paid and pre-paid customers can use the roaming services in 146 countries worldwide, through 404 networks, compared to 143 countries and 377 networks in 2017. At the same time, GPRS service is available through 277 networks in 114 countries, compared to 226 networks in 104 countries in 2017.

Cost control: Our bill shock prevention service while roaming notifies the post-paid subscriber through a SMS in case the data usage threshold while roaming has been reached and the subscriber is redirected to a page in order to select the appropriate option. Furthermore, pre-paid subscribers can check their balance, last call and expiry period via IVR/USSD/My One App and post-paid subscribers can check their actual monthly consumption via SMS/USSD/My One App.

3. Customer Service and Satisfaction

✓ Your Opinion... Customer Service and Satisfaction

According to a survey conducted to 1,200 citizens in February 2021, our company and our competitors were positioned in the following ranking order:

Issue	1 st Place – Best	2 nd Place	3 rd Place
l trust my mobile provider	One	Competitor B	Competitor A
My mobile provider offers easy to use products and services	One	Competitor B	Competitor A
My mobile provider rewards me different bonuses for my purchases	Competitor B	One	Competitor A

A. Aiming for customer satisfaction

V Good Practice... Mobile Application

One Telecommunications has launched the fully functional self-care mobile application My One for Android and iOS users, who can:

- Check their account anytime, anywhere (e.g. remaining units, active packages, tariff plans, balance and extra costs, billing information) and control their balance for all tariff plans.
- Recharge and add an amount to any pre-paid account through credit or debit card for own or other MSISDN (Mobile Station International Subscriber Director Number) phone numbers.
- Activate the bundle that fits their needs, as well as standard and add-on packages.
- Pay and download their invoices (for B2C users).
- Check their personalized offer category for dedicated offers.
- Check their unpaid bills and use credit or debit card to pay either their own bill.





- Remain in direct contact with Customer Care, as they can send a message or call directly our customer support or start a chat conversation or request a callback through the Help & Support section, which also includes a Frequently Asked Questions section (FAQ) available to all customers.
- Activate or deactivate any service they need or don't need.

We consider our customers' satisfaction a strategic growth element and focus our efforts on three main categories:

- Continuously update our technology offering and network.
- Provide innovative and effective solutions.
- Offer the best customer experience through our employees.

We seek to cultivate a reciprocal, sincere and trustful relationship with our customers, in order to be their preferred choice. For this reason, we closely monitor our performance regarding customer satisfaction, through an annual qualitative and quantitative survey to analyze our company's and brands' strengths, both in both in absolute terms and compared with our competitors.

V Good Practice... Customer Experience

Customer Experience refers to the interactions between a customer and an organization throughout their business relationship. We have introduced the Customer Journey concept since 2016, in order to find areas for improvement throughout all customers' phases/steps during a product's or service's lifecycle and, ultimately, improve our performance. Within this context, we have:

- Defined new products with mandatory Customer Journey requirements.
- Introduced Customer Journey as part of the product development stage.
- Conducted Customer Journey exercises for new activations and business roaming.
- Introduced an automated Facebook ChatBot to enhance our self-service approach to customers, being the first company in the telecommunications industry in Albania with such feature.
- Allowed all self-service actions required by customers to be performed through our mobile application.

B. Monitoring sales network's performance

We perform a 'Mystery Shopping' survey to monitor our sales network's performance in 5 dimensions, without however conducting the respective survey within 2019-2020:

- Time of Service.
- Sales and Services.
- Customer Care.
- Professionalism.
- Shop Environment.

C. Ensuring service reliability

V Good Practice... Corporate Website

We provide a wide a range of services to our customers via our corporate website, which include:

- A fully functional e-care/e-shop online portal, where customers can purchase their products and either pay with credit/debit card or on delivery, with all items being delivered within 48 hours, as well as purchase a mobile device with a bundle.
- A Pre-paid eTop-up service, where customers can use a credit/debit card to remotely add an amount to any prepaid account.
- Frequently Asked Questions and Customer Support areas, where we inform our customers about related issues, such as shop location and automatic Internet settings.
- The My account (Llogaria ime) log-in area, where customers can register and receive real-time information (e.g. remaining credit, credit expiry date, PUK code retrieval), activate or deactivate services and purchase bundles.
- Electronic bill and e-Payment, which includes the last bill's due amount, the undue amount and traffic information, which customers can use a credit/debit card to pay their bill.
- A product bundling option, where customers can purchase a premium product and get free accessories or another discounted device.



A promo code for different promotional campaigns.

Our ability to offer reliable and uninterrupted services is an important parameter of customer satisfaction, which we consider one of our main obligations.

	Network Reliability				
		2017	2018	2019	2020
Network availability (%)					
	2G	99.68	99.7	99.8	99.5
	3G	99.97	100	99.98	99.7
	4G	99.84	99.9	99.9	99.8
	4G+	NR	NR	99.9	99.8
Call success rate (%)					
	2G	99.89	99.9	99.95	99.8
	3G	99.65	99.7	99.8	99.9
	4G	99.75	99.87	99.8	99.7
	4G+	99.75	99.87	99.8	99.7
Drop call rate (%)					
	2G	0.73	0.8	0.87	0.54
	3G	0.29	0.25	0.18	0.2
Data drop rate (%)					
	4G	0.17	0.2	0.2	0.1
	4G+	0.17	0.2	0.2	0.1

NR: Not Reported

We reduced the drop call rate on our 2G network by 37.9% and data drop rate on our 4G network by 50%

D. Monitoring our performance

To improve customer service, we:

- Have adopted unified procedures and practices to manage customer complaints.
- Implement tailor-made negotiation strategies and effective communication methods.
- Manage customers with a mobile connection from a separate team, in order to receive a single, integrated service.
- Have established personalized service with increased telephone communication.
- Seek to increase First Contact Resolution.
- Seek to further utilize digital channels (e.g. chat).

We have established mechanisms to communicate and receive comments and complaints (in case of delays, we inform the customer for the reasons of delay and the excepted time to resolve his/her complaint), in order to effectively serve our customers, which include:

- Written communication to our offices.
- The e-mail address <u>ankesa-zyrtare@one.al</u>.
- Our Call Centers (139 for pre-paid customers, 144 for post-paid customers and 142 for both pre-paid and post-paid customers).
- Personal contact at the company's points of sale.

Within 2020:





- We received 2,502,555 customer requests, with approximately 58% of those being answered and solved automatically from our IVR system.
- We received 5,024 complaints, without any of them resulting in a fine or other non-monetary sanction.
- The average time to resolve complaints was 4.5 days, compared to 3.5 days in 2019.

Custome	r Service			
	2017	2018	2019	2020
Customer requests received				
IVR (number)	1,916,782	1,470,291	1,106,643	1,452,737
Facebook (number)	31,547	42,636	67,734	130,088
Live chat (number)	NR	NR	55,859	80,121
wapp (number)	NR	NR	NR	129,941
Chatbot (number)	4,859	6,839	6,063	6,065
Mobile application (number)	4,646	29,523	27,201	35,907
Website (number)	1,586	2,372	1,136	1,363
Call center agents (number)	798,257	589,390	526,086	666,333
Complaints received				
By e-mail and Siebel Ticket				
Complaints (number)	2,311	2,071	2,143	4,710
Complaints resolved within 5 days (number)	2,034	1,531	1,919	4,017
Average days to resolve (days)	3	5	2.8	3.5
In written (form in shops) – Protocol Office				
Complaints (number)	778	570	376	314
Complaints resolved within 5 days (number)	685	312	312	272
Average days to resolve (days)	3	7	3.5	4.8
Through Siebel and Protocol				
Complaints (number)	583	597	NR	NR
Complaints resolved within 5 days (number)	513	378	NR	NR
Average days to resolve (days)	3	6	NR	NR
Complaints category (number)				
Product and services	666	580	532	941
Cost of products and services ⁽¹⁾	1,732	1,778	1,691	3,489
Policies and procedures ⁽²⁾	1,235	812	278	548
Product and service reliability ⁽³⁾	39	68	18	46

(1) Includes billing and charging complaints, i.e. tariffs charging (voice, messages, national and international) and roaming charging.

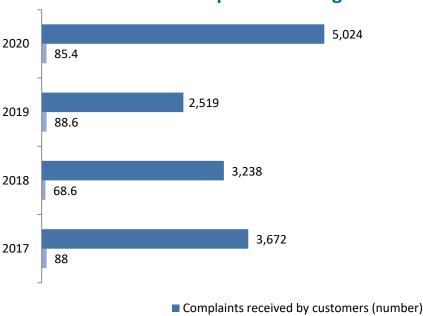
(2) Includes contract claims, bad debt notification and payment clarification.

(3) Includes technical issues, such as network coverage (GSM, 3G and 4G), as well as internet service speed and status.

NR: Not Reported







Complaints Management

We resolved 85.4% of complaints received within 5 days

Complaints resolved within 5 days (%)

4. Data and Information Security

A. Protecting personal data

Policy... Protection of Personal Rights on Handling Personal Data

Our Binding Corporate Rules Privacy Policy ensures data privacy and describes the measures taken to manage and share all types of personal data, respect individuals' rights and manage liability, through its provisions in the following issues:

- Transparency of Data Processing.
- Conditions of Admissibility for the Use of Personal Data.
- Transfer of Personal Data.
- Data Quality and Data Security.
- Rights of Data Subjects.
- Data Privacy Organization.

Security of personal data and communication content is not only an important commercial issue, but also a legal and ethical obligation. Therefore, we:

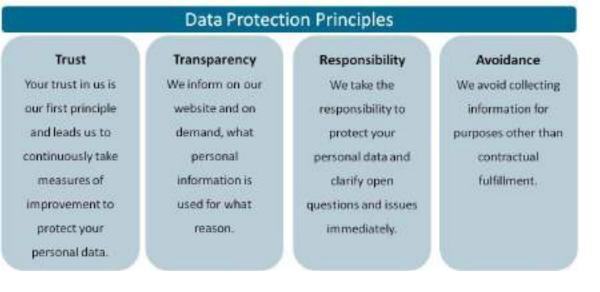
- Comply with national legal requirements concerning personal data security, including handling of requests by the competent judicial, prosecutorial and police authorities to lift customer confidentiality and disclosure, with data traffic records for 2,513 telephone numbers and subscriber master data for 2,151 cases requested within 2020, as well information and CCTV footage for 26 cases requested from respective authorities.
- Require personal consent to collect, process and use any personal data only for their designated purpose.
- Have established the Information Security and Business Continuity Management Steering Committee provides management direction and guidance for the company's information security efforts, including implementation of all security requirements from Information Security Policies in the company's IT/NT infrastructure.





- Have introduced the Binding Corporate Rules Privacy Policy, the General Security Policy and the Customer Privacy Code, which specifically describes:
 - The type of customer information collected.
 - The methods to collect customer information.
 - The use of customer information.
 - Disclosure of customer information.
 - Storage and protection of customer information.
 - The methods for customers to update their information and select how to be contacted.
 - Communication of policy changes and updates, as well as contact information for questions or comments about our privacy practices.
- Completed the pre-assessment to certify the Information Security Management System in accordance with ISO 27001.
- Comply with AKEP's Information Security Regulation in all internal policies on information security.
- Utilize suitable and appropriate organizational and technical means and infrastructures.
- Have developed the Information Security Annex with the set of rules and technical requirements that vendors or third parties should accept and implement on the new technical implementations, in order to ensure that they accept, implement and correctly follow our security requirements.
- Implement Privacy and Security Assessments for every new technical implementation within our technical infrastructure on all the security requirements that should be implemented.
- Perform semi-annual Security Audits of our Data Security Management System, with no cases of non-compliance identified during these audits in 2020.
- Handle and perform various audits related to information security, with 4 audits (all internal) conducted during 2020.
- Have included a dedicated Privacy Awareness section in our Induction Program and inform our employees on information security and data privacy, through Information Security Awareness Sessions we organize every year. Within 2020, we organized respective sessions for all our new employees, as part of their Induction training.
- Have introduced and implement technical solutions for system and network devices security and security vulnerabilities scanning.

Data Principles



In 2020, there were:

- 26 Information Security Policies updated, which are currently under approval by the Information Security and Business Continuity Management Steering Committee and will be posted on our corporate Intranet.
- 3 Information Security audits, with no recorded non-compliance incident.
- 16 incidents regarding Internet mail spams reported to Information Security and Business Continuity Management Office.





- 382 actions blocked to prevent data leakage from our Data Leakage Prevention System.
- One data leakage investigation case, which was escalated to our Top Management.
- No complaints or cases of non-compliance with regulations and voluntary codes regarding privacy issues or loss of personal data.
- No incidents or legal actions for non-compliance related to personal data protection.
- No relevant fines or other non-monetary sanctions imposed by respective authorities.

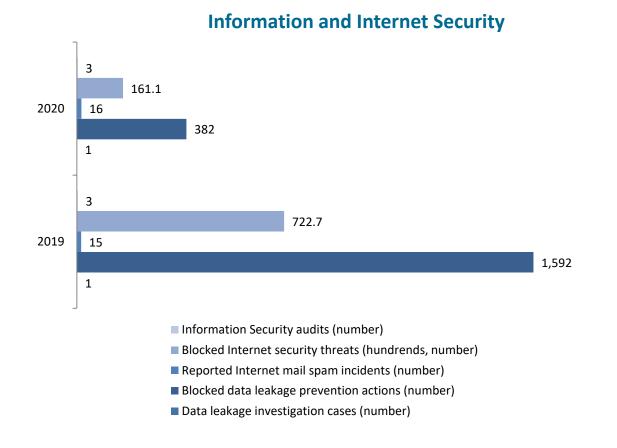
We had no incidents regarding customer privacy issues or loss of personal data

We conducted Information Security Awareness Sessions to 27 employees and 100% of new hired employees

B. Upholding Internet security

We have included advices and practices on safe Internet use and information security on our website to inform our subscribers and the general public regarding:

- E-mail and security.
- Safety for children.
- How to navigate safely online.
- What can you do to protect your personal computer.
- What can you do to secure your mobile device.
- Important questions about storing personal data.
- Mobile phones and security.







We successfully blocked over 16,000 Internet security threats

C. Protecting minors

√ Good Practice... Promoting Safer Internet Use from Minors

Aiming to promote safer Internet use from minors and raise awareness on the potential risks from online activities, we:

- Collaborated with the ICTSlab multifunctional center to organize a bootcamp on online safety on the occasion of the Safer Internet Day, where we informed 30 children on the fundamentals of digital safety according to Google's BIA (Be Internet Awesome) program and concepts such as digital print, phishing and spam, online privacy and oversharing, critical evaluation and how to react when their rights are violated or when they feel like someone is using or threatens them online. At the end, the initiative also featured a practical test on the new concepts learned.
- Organized a 1-day training at the ICTSIab multifunctional center on the occasion of the Safer Internet Week, during which over 25 employees' children were informed on digital safety according to Google's BIA (Be Internet Awesome) program and concepts such as digital print, phishing and spam, online privacy and oversharing, critical evaluation and how to react when their rights are violated or when they feel like someone is using or threatens them online. The initiative featured various games (e.g. Interland) to teach the fundamentals of online safety to children, in order to pay attention when they are online and become 'smart' Internet users.
- Collaborated with AKCESK (the National Authority for Electronic Certification and Cyber Security) and contributed to the #CyberCorner inauguration at Hamit Beqja library in Tirana on the occasion of the Safer Internet Day. The project aimed to raise children's awareness on Internet safety and use the e-services at the library's multifunctioning areas, in order to familiarize them with techniques and ways to use Internet safely.

We believe that parents should be properly informed about mobile telephony features and functions, such as access to services, voice calls, SMS, sending and receiving photographs and videos, as well as Internet access, in order to promptly decide what services their children are permitted to have access to. For this purpose, we:

- Comply with the contractual obligations as defined by the national legislation regarding provision of services to minors.
- Have voluntarily signed and comply with the National Code of Conduct for 'Safe and Responsible Use of Electronic Communication Networks', which outlines the principles to protect children and the general public from the risks associated with Internet access.
- Cooperate with ALO 116 (National Line of Child Consultancy), a joint initiative of UNICEF Albania and the Children's Rights Center in Albania, which offers social advice and support to children and people all over Albania and reports related incidents to the responsible authorities.
- Conduct awareness campaigns regarding Internet dangers, without however conducting a relevant campaign within 2020.
- Have published a set of Guidelines related to Information Security and Privacy on our website.
- Do not offer any adult, chatting or horoscope services.

As a result, within 2020 there were:

- No cases of non-compliance with laws and regulations regarding product and service use or their health and safety impacts.
- No recalls of products and services regarding health and safety impacts.
- No incidents or legal actions for non-compliance related to product and service use or their health and safety impacts.
- No relevant fines or other non-monetary sanctions imposed from respective authorities.

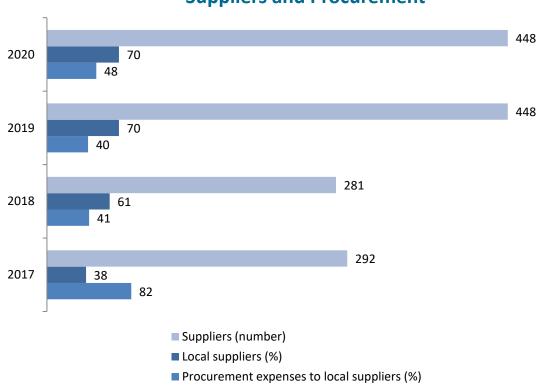




5. Responsible Procurement and Supplies

A. Supporting suppliers

During 2020, One Telecommunications cooperated with 448 suppliers, out of whom 70% are local suppliers, as in 2019. It must be noted that the company's activities and operations over the years have encouraged international partners to establish their own presence in Albania. In 2020, the percentage of procurement expenses allocated to local suppliers reached 48%, compared to 40% in 2019.



Suppliers and Procurement

We increased the percentage of procurement expenses from local suppliers to 48%

B. Influencing our supply chain

- Policy... Procurement Policy

According to our Procurement Policy, we are committed to:

- Behave ethically and fairly in all business relationships with our Suppliers and all other parties.
- Conduct our procurement activities in accordance with all applicable laws and government regulations.
- Adhere to all Compliance Policies and regulations.



✓ Good Practice... Responsible Procurement

Within our Code of Conduct, we have included principles which underline the way we interact with our suppliers. Within this frame, we:

- Maintain relationships with our suppliers based on trust and fairness.
- Behave towards partners and suppliers with respect and transparency.
- Favor collaborating with environmentally friendlier and socially responsible suppliers.
- Generally separate any related purchasing and sales activities.

Furthermore, according to our Supplier Code of Conduct, suppliers must:

- Comply at all times with applicable laws, regulatory provisions and contractual obligations, as well as international trade sanctions.
- Respect internationally proclaimed human rights and avoid being complicit in human rights abuses of any kind.
- Respect the each individual's personal dignity, privacy and rights.
- Avoid forced labor and slavery.
- Adhere to all International Labor Organization's (ILO) standards.

Each supplier is obliged to bind its contractors and/or subcontractors to the Supplier Code of Conduct's principles related to Social, Environmental and Business Practices.

Since our size can significantly influence our suppliers' responsible operations, we adhere to socially and environmentally friendlier procurement practices and utilize internal and external performance indicators and management tools to systematically manage our procurement process. Furthermore, we:

- Have developed a Procurement Policy to define the rules and terms of our procurement activities.
- Establish a Tender Committee for all tenders with representatives from all involved organizational units, including the requesting Department, the Procurement & Logistic Department, the Legal & Regulatory, Data Privacy & Compliance Department and the Strategic Finance Department.
- Conduct our procurement activities in accordance with our Code of Conduct and Social Charter and its underlying principles regarding the respect of internationally proclaimed human rights. The Code complies with the fundamental principles and standards of the International Labour Organization (ILO), the Universal Declaration of Human Rights and the UN Global Compact, as well as the Organization for Economic Co-operation and Development (OECD).
- Have adopted and included in our Supplier Code of Conduct a set of core values and business principles to evaluate our suppliers regarding Corporate Responsibility issues in the areas of Social Responsibility, Environment and Business Practices, which is incorporated in every contract agreement for the supply of services and goods.
- Require from all suppliers who submit their proposals and in all commercial agreements regulated through a contract to sign and explicitly declare that they accept and agree to adhere to the Supplier Code of Conduct.
- Have adopted Integrity Checks to consider prior to initiate collaboration with all new suppliers, which are performed according to our anti-corruption practices and company policies and procedures. As part of our Procurement Policy before collaboration with new suppliers, our Compliance function performs Integrity Checks on these suppliers according to the compliance criteria (Compliance & Business Assessments), as well as suppliers with no collaboration for the last two years. During 2020, we conducted integrity checks to 100% of our new suppliers.
- Include Corporate Responsibility and anti-corruption clauses to the tender requirements by our Departments, which are binding for all company suppliers and are also included in all contracts with suppliers and other parties.
- Expect from our suppliers to take all necessary actions in order for their contractors and/or subcontractors to comply with the Supplier Code of Conduct's obligations.
- Require from suppliers to provide the necessary evidence to confirm compliance with our Social, Environmental and Business principles and are obliged to disclose any failure to comply with our Principles, either by themselves or by any of their contractors and/or subcontractors.
- Stipulate Social, Environmental and Compliance audits to suppliers and their contractors and/or subcontractors, in order to evaluate their actual conformity with the Supplier Code of Conduct's principles.
- Mandate completion of a self-assessment questionnaire on Corporate Responsibility issues for all new suppliers.





- Request from all employees involved in procurement processes to disclose any actual or potential conflict of interests to their manager and Compliance Function, in accordance with our Policy on Avoiding Corruption and Other Conflicts of Interest.
- Consider any violation of our Procurement Policy as an action which can result in disciplinary or other sanctions (e.g. employee dismissal), as well as adverse legal consequences with claims against employees violating this Policy.

We communicated our Supplier Code of Conduct to all our suppliers, with 100% of them signing its acceptance

Corporate Responsibility Issues Included in the Supplier Code of Conduct

Categories	Issues		
	Freedom of Association and Right to Collective Bargaining		
	Child Labour		
Social Responsibility	Diversity and Non-Discrimination		
	Remuneration		
	Working Hours		
	Health and Safety		
Environment	Environmental Protection		
Environment	Natural Resources and Waste Management		
	Anti-Corruption		
	Competition		
Business Practices	Sponsorship		
Busilless Plactices	Political Contributions		
	Money Laundering		
	Data Security and Data Protection		

C. Monitoring suppliers

We aim to evaluate suppliers' performance based on the quality and efficiency of their products or services, as well as evaluate their commitment towards environmental protection, employee health and safety and Corporate Responsibility, without however conducting our Supplier Evaluation Process during 2019-2020. It must be noted that so far, we have not identified any suppliers with significant actual or potential negative environmental, labour practices and human rights impacts or social impacts, while no relevant incidents have been reported to date.

D. Ensuring product safety

The provision of safe products is a particularly important issue for One Telecommunications and the company applies a wide range of practices to ensure that they are manufactured according to international standards and conventions. For example:

- Equipment sold in One Telecommunications sales network:
 - \circ $\;$ Carries the statutory CE labeling, which is mandatory in the European Union.
 - Complies with the applicable European regulations, i.e. the Radio Equipment Directive (RED), the Restriction of Hazardous Substances (RoHS) Directive and the EU packaging and packaging waste legislation.
 - o Complies with the national legislation regarding WEEE and waste packaging materials.
- All equipment and products sold include detailed installation instructions in their packaging and we have included technical specifications and instructions for the equipment's safe use and installation in our website.





- One Telecommunications inquires suppliers about data regarding SAR levels of mobile devices, data which are made available to our customers.
- Mobile phones sold comply with the internationally acceptable SAR levels (Specific Absorption Rate).
- Mobile phones' SAR levels are included in the product manual or user guide for each device.

6. 2020 Achievements and Future Targets

We will	Ву
Complete certification of the Information Security Management System in accordance with ISO 27001	2021
Conduct our Supplier Evaluation Process	2021

IV. OUR SOCIETY

Introduction and Summary

Our Size: €68.1 million turnover

€107 million economic value distributed

€45,000 social contribution

10,935 people supported through our social support activities

16 organizations supported through social support activities

Our Objective:

To combine our business success, with prosperity and quality of life, for citizens in local communities we conduct our business in.

Our Achievements:

- We contributed over €7.2 million to the Albanian State for taxes, insurance contributions and regulatory fees.
- We distributed over €107 million in economic value: €7.8 million to employees,
 €2.9 million for taxes, €65.4 million to suppliers, €0.05 million to society and
 €30.9 million for investments.
- The total time allocated to social support activities reached 908 work hours.
- Approximately 21.4% of our monetary social support was related to improving community infrastructure for public benefit.
- We provided internships to 111 students in the last four years.
- The total time allocated to volunteering activities during 2019-2020 reached 22 work hours.



1. Economic Value Distributed

Your Opinion... Reputation

According to a survey conducted to our employees in 2020, 87% believe that we have an excellent reputation within the community.

A. Supporting the Albanian economy

One Telecommunications contributes to the Albanian economy's development through investments in telecommunication infrastructures, creating job positions and introducing products and services. The company achieves positive financial results, which are indicatively presented below for the period 2017-2020, while no financial assistance was received from the Albanian State (e.g. government financial subsidies, state aid, special tax relief or other government financial payments) due to any reason (e.g. COVID-19 pandemic).

Financial Results

	2017 ⁽¹⁾	201 8 ⁽¹⁾	2019	2020
Total revenues (million €)	68.1	69	68.8	68.1
Earnings before interest, taxes, depreciation and amortization (EBITDA) (million €)	8.7	11.9	14.4	20.8
Capital expenditures (including spectrum payments) (million €)	15.7	9.3	18.1	26.1
Net profits (million €)	(4.9)	(10)	6.6	2.2
Corporate taxes (million €)	4.1	0	(0.7)	2
Total taxes (including VAT) (million €)	6.6	4.9	5	2.9
Payments to suppliers (million €)	85.5	63.4	70.4	65.4
Cost of employees (including salaries, benefits and insurance payments) (million €)	6.6	6.5	6.6	7.8
Investments (million €)	8.7	10.9	38.2	30.9

(1) Adjusted values for 2017 and 2018, excluding Special Factors. NR: Not Reported

Contribution to the Albanian State

Contribution			•	
	2017	2018	2019	2020
Direct taxes (excl. payroll tax on employee salaries) (thousand €)	856.1	861.1	636.9	483.2
VAT (thousand €)	2,279.2	3,235.3	4,406.4	2,391.5
Income tax paid (thousand €)	3,330	770.5	0.3	1.6
Indirect taxes (excl. mobile and pay-TV fee) (thousand €)	148.3	55.7	17,136	1,324
Property taxes (for the company's properties) (thousand €)	25.5	16.8	30.2	17.6
Fees to telecommunications regulatory authorities (thousand €)	1,642.1	1,948.3	7,441	2,136.2
Insurance contributions (thousand €)	1,004.8	920.6	1,528.9	888.9
TOTAL (thousand €)	9,286	7,808.3	31,179.7	7,243

We contributed over €7.2 million to the Albanian State for taxes, insurance contributions and regulatory fees



Our business operations ensure we generate and return significant economic value back to our Stakeholders, mostly through purchases (towards our suppliers), salaries, benefits and insurance payments (towards our employees), taxes (towards the State), social contribution (towards society) and investments.



(1) The amount refers to gross salaries, benefits and insurance payments.

- (2) The amount refers to total taxes, including VAT.
- (3) The amount refers to value of sponsorships and donations.

We distributed over €107 million in economic value: €7.8 million to employees, €2.9 million for taxes, €65.4 million to suppliers, €0.05 million to society and €30.9 million for investments

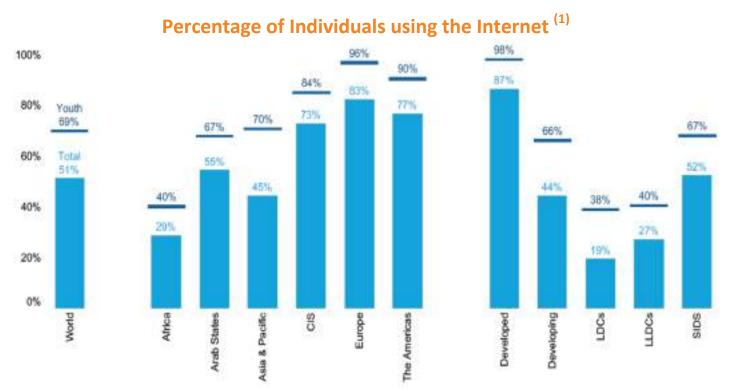
2. Digital Divide

A. Understanding the digital divide

According to the International Telecommunication Union's (ITU) data, approximately 50% of the world population and 69% of individuals between 15-24 years old use the Internet, which also means that approximately 369 million young people and 3.7 billion people in total remain offline, despite the large proliferation of technology services. Inequalities are also evident among regions, as Europe and the Americas feature the highest rates of Internet users, both for young



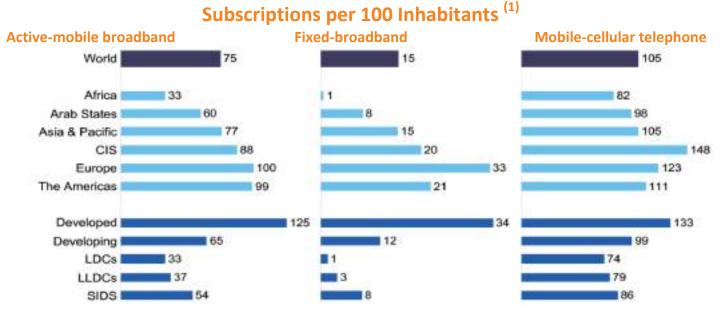
people and overall population, followed by the CIS countries (the former Soviet Union countries, which have made a giant leap in the last few years). At the same time, Asia and the Pacific is the region with the highest youth/overall ratio, which indicates the potential for older age groups to catch up with younger ones in this region in their Internet use. Which is important to note is that virtually all young persons were using the Internet by the end of 2019 in developed countries, while the overall share of people using the Internet in LDCs (Least Developed Countries) was half of the corresponding share for young people, which itself is only 38% per cent of young people in these countries.



⁽¹⁾ SIDS: Small Island Developing States; LLDCs: Landlocked Developing Countries; LDCs: Least Developed Countries Source: ITU's Measuring the Information Society Report 2020; data are 2019 estimates

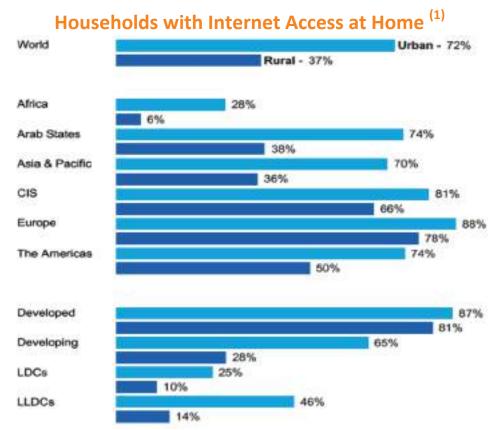
At the same time, there are approximately 34% more mobile-cellular and over 92% more active-mobile broadband telephone subscriptions per 100 inhabitants in developed countries compared to developing countries. Furthermore, LDCs (Least Developed Countries) are even further behind, as there are approximately 80% more mobile-cellular and almost four times as many active-mobile broadband telephone subscriptions per 100 inhabitants in developed countries compared to LDCs. The respective divide is even greater in the fixed-broadband subscriptions, with 34 subscriptions per 100 inhabitants in developed countries, compared to 12 subscriptions in developing countries and only 1 subscription per 100 inhabitants in LDCs.





(1) SIDS: Small Island Developing States; LLDCs: Landlocked Developing Countries; LDCs: Least Developed Countries Source: ITU's Measuring the Information Society Report 2020; data are June 2020 estimates

Another highly representative indicator of the digital divide's extent is the fact that while household Internet access in urban areas of all world regions was between 70%-88% in 2019, with access in rural areas ranged between 37%-78%, only 28% of households in urban areas of Africa had access to the Internet at home, which was however 4.5 times higher compared to rural areas in this region. The world average of households with Internet access at home in 2019 was approximately 72% in urban areas, which is almost twice as high as in rural areas (37%). The urban-rural gap was quite small in developed countries, but urban access to the Internet in developing countries was 2.3 times as high as rural access.



(1) LLDCs: Landlocked Developing Countries; LDCs: Least Developed Countries Source: ITU's Measuring the Information Society Report 2020; data are 2019 estimates





Despite the continuous efforts to bridge the digital divide, Albania faces corresponding challenges to provide modern ICT services to a wider population, since approximately 0.1% of exports are high-technology exports, compared to the world average of 16.5% (World Bank's data for 2017). At the same time, the country's overall unemployment rate reached 11.5% in 2019 (including 14.9% unemployment rate of individuals with advanced education), with an unemployment rate of women and men between 15-24 years old of 25.8% and 27.7% respectively, for a total of 27% unemployment rate of young people, based on World Bank's data for 2019. This is generally evident by the respective communications and Internet penetration rates for Albania, as depicted below:

Albania's ICT Comparison

	2019		
	Albania	Average of European countries	
Fixed-telephone subscriptions per 100 inhabitants (number)	8.4	32.9	
Mobile-cellular telephone subscriptions per 100 inhabitants (number)	91.3	123	
Fixed-broadband subscriptions per 100 inhabitants (number)	15.1	32.1	
Active mobile-broadband subscriptions per 100 inhabitants (number)	62.1	97.4	
Individuals using the Internet (%)	68.5	82.5	
Households with a computer (%)	20.2	77.5	
Households with Internet access at home (%) ⁽¹⁾	82.2	82.9	
(1) Data refer to 2018			

(1) Data refer to 2018. Source: ITU's ICT Indicators

B. Reducing the digital divide

Our approach related to reduce digital divide is to ensure proper geographical and demographic coverage, as well widen access and create opportunities for individuals and communities to utilize digital services, even in the country's remote areas. One Telecommunications strives to connect people all over the country and contribute to overcome the socio-cultural barriers that restrict the opportunity to participate in the information society and enjoy its benefits.

Currently, One Telecommunications has over 1.2 million customers (mobile only, excluding M2M), who expect to remain connected at all times, and offers 95.5% territory coverage and 98.5% population coverage in its 3G network, compared to 92.1% and 97.6% respectively in 2019, as well as 93.7% territory and 98.1% population coverage in its 4G and 4G+ networks respectively, compared to 59.2% and 86.4% respectively in 2019.

3. Social Products and Services

A. Supporting services for the broader well-being

Our main objective is to utilize technology to serve people and offer communication services, which support wider needs of society.

Emergency Services: We allow free-of-charge calls in our network to emergency numbers, such as 127 (Ambulance), 128 (Fire Brigade) and 129 (Police).

Public Awareness: During 2020, we offered services to facilitate communication of citizens through short codes to provide support for various good causes, namely through:

- The 0800 9191 short number, which is available 24 hours a day, 7 days a week, by the State Police for all citizens to report any case of violence.
- The 142 short number, through which customers could send an SMS to support families affected by the November 2019 earthquake.
- The short code 116116 established by the Albanian Ministry of Defense and the General Directorate of Civil Emergencies, which was used in 2019 to report damages in houses and adverse conditions due to the earthquake in November and offer help and respond to inquiries due to the COVID-19 pandemic in 2020.



4. Social Contribution and Support

Your Opinion... Societal Support

According to a survey conducted to 815 citizens in July-September 2019:

84% believe it is important for operators to be actively involved in supporting community initiatives.

63% believe that we are engaged or committed to support initiatives or organizations of various communities in the development of their social cultural, economic or environmental life as a contribution to the development of society.

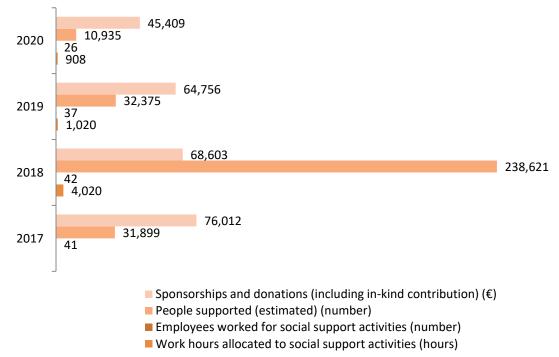
60% have heard, saw or noticed our societal support activity (e.g. sport, festivals, cultural/social events), excluding television programs.

A. Supporting society

We focus on the following areas to support society, in order to help people in need and improve their quality of life.



Social Support



The total time allocated to social support activities reached 908 work hours

Approximately 21.4% of our monetary social support was related to improving community infrastructure for public benefit

Social Support Activities 2019-2020

Support Area	Activity				
Children	Support for the 'Give a Smile' initiative, organized by the Center for Change and Empowerment, which distributed gifts during the end of year festivities to approximately 100 hospitalized children in Mother Teresa University Hospital's Pediatric Ward				
Vulnerable Social Groups	Provision of gifts to 20 hospitalized children at Mother Teresa University Hospital's Onko-Hematology Ward				
Education	Support for the 41 st International Conference of Data Protection and Privacy Commissioners (ICDPPC 2019), organized by the Albanian Office of Information and Data Protection				
	Collaboration with the ICTSlab multifunctional center to organize an online security bootcamp on Internet safety and digital safety fundamentals, as well as a 1-day training for employees' children (see Subsection III-4C)				

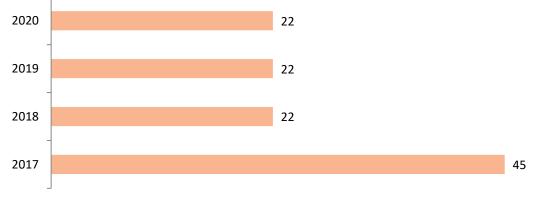


	One
	Contribution to a #CyberCorner inauguration at Hamit Beqja library in Tirana on the occasion of the Safer Internet Day, in collaboration with AKCESK (National Authority on Electronic Certification and Cyber Security), in order to raise children's awareness about Internet safety and familiarize them with techniques and ways for safer Internet use (see Subsection III-4C)
	Sponsor to the iKorca Hackathon, organized in collaboration with the Municipality of Korca, which aimed to bring together young innovators (e.g. students, university researchers and staff members, university-based startups and other talent) and receive expert support to create solutions for real-life challenges
Entrepreneurship	Support for the 'Green Ideas' competition organized by the non-profit organization 'Partners Albania, Center for Change and Conflict Management' during 2019 and 2020, which aims to identify, select and support innovative ideas to promote sustainable development
	Support to Klubi Soroptimist, in order to facilitate underprivileged art lovers to develop their talent
Culture	Support for the German October activities organized by the German Chamber of Commerce and Industry in Albania (DIHA), a cultural and educational program with several cultural and artistic events, such as exhibitions, theater and movie plays, concerts, training workshops, discussions and joint projects
	Support of the Association of Bulgarian Media
Sports	Sponsor to the Tirana Marathon 2019 in collaboration with the Municipality of Tirana
	Sponsor to the Rally Albania 2019, organized by the Motorsport Club Albania, with 112 participating racers
Local Communities	Support to the Regional Hospital of Korca, in response to the urgent need to rehabilitate the Emergency Department hall and entrance
	Reconstruction of Public Hospital of Lezha's main ward and provision of necessary equipment and materials items for daily medical activities

Internship programs: We offer internship programs to students, in order to give them the opportunity to gain work experience and develop valuable skills, which will help them perform better in their future jobs or studies. Within 2020, we provided internship programs to 22 students (as we did in 2019), who applied their knowledge in a real work environment and acquired professional experience to develop skills and competencies, in order to advance their personal and professional development.



Internship Programs



Students in internships (number)

We provided internships to 111 students in the last four years

B. Ensuring transparency of society support activities

V Good Practice... Transparency of Donations and Sponsoring

According to our Code of Conduct, we comply with the legal and financial frameworks regarding our support to education, science, culture, social causes, sports and the environment with financial and in-kind donations, as well as services. As a result, we:

- Do not proceed with any donations to obtain business advantages.
- Comply with the respective legal requirements and internal policies.
- Record the recipient's name and the donation's purpose for all donations.
- Do not perform any donations to individuals or private accounts, as well as to individuals or organizations that could potentially damage our interests or image.
- Require that sponsoring partners/organizers deliver appropriate and verifiable communications and marketing services.

Our approach for each project's implementation utilizes the following four-stage process:

- Planning, where we identify the project's:
 - o Objectives.
 - o Beneficiaries.
 - o Duration.
 - o Monitoring methods.
 - o Budget.
- Selection, where we select the projects based on clearly predefined criteria.
- Management, where we usually conclude partnership agreements with either cash or in-kind contribution with various organizations.
- Control, where we utilize specific Key Performance Indicators to measure its success, based on the project's specific features.

It must be noted that:

- We take into account the needs of interested parties during consideration of new social support activities.
- The CEO and Senior Management oversee the objectives and strategy of the major social support activities and are systematically informed about the activities implemented.



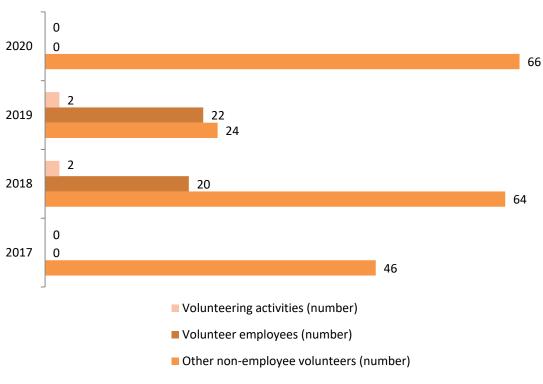


- The Corporate Affairs Department is responsible to design and implement social contribution activities, with the CEO's direction and support.
- The CEO approves all sponsorships and donations after their review and approval by the company's Compliance Office regarding their compliance with the company's regulations.
- We collect data to measure the impact of social support activities.

C. Encouraging volunteerism

We cultivate volunteerism and strive to involve our employees, customers, suppliers and business partners in various initiatives and programs, in order to develop responsible and active citizens. During 2019-2020, we:

- Participated with a team of 20 employee volunteers in the Tirana Marathon 2019.
- Participated in the Center for Change and Empowerment's 'Give a Smile' initiative in 2019, where 2 employee volunteers helped the organization to distribute gifts collected during the end of year festivities to the children hospitalized in Mother Teresa University Hospital's Pediatric Ward and also spent time with children and their parents.



Volunteerism

The total time allocated to volunteering activities during 2019-2020 reached 22 work hours

D. Caring for the impact of our operations

V Good Practice... Impact on Local Communities

Based on our extensive Risk Assessment, we evaluate potential risks from our operations to early detect the impact of potential incidents or accidents to local communities. As a result, we have established a range of preventive measures which include:

- Fire detection systems.
- Fire alarms to report and monitor incidents through the Network Monitoring Center in real time.



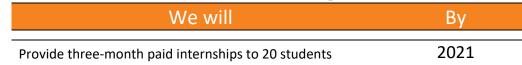


- Proper fuel accumulating infrastructure with concrete basins around fuel containers to prevent any potential fuel discharges into the premises and surrounding areas.
- Dedicated spill kit to properly respond in cases of oil or fuel spills.

Local communities are directly related with our company and activities. Therefore, we aim to identify our operations' impacts on local communities and ensure that our operations respect the well-being of Albanian citizens. Within 2020, there were:

- No operations identified with significant actual or potential negative impacts on local communities.
- No complaints filed through formal grievance mechanisms regarding the impact of our operations on local communities.
- No cases of dispute with the local communities.
- No accidents with significant impact on the local communities.
- No legal actions and no fines or other non-monetary sanctions imposed by the respective authorities regarding the impact of our operations on local communities.

5. 2020 Achievements and Future Targets



V. OUR EMPLOYEES

Introduction and Summary

Our Size: 396 employees

330 employees

59.6% women

37 years old average age of employees

0 accidents

816 hours of training

Our Objective:

To create a work environment, which ensures long-term career opportunities and facilitates our employees' development.

Our Achievements:

- We employ 100% of our employees with full time employment contracts.
- We informed all employees at least once regarding Corporate Responsibility issues.
- 36% of total mandays were conducted remotely.
- We increased average health and safety training hours by 18.8%.
- We had no accidents within our workplace.
- We assessed 100% of applicable employees.
- We maintained the percentage of women employees to over 59% of total workforce.
- We increased the percentage of women in Middle and Upper Level Manager position to 57% and 53% respectively.
- Our lowest employee salary is 23% higher than the legal basic salary.
- We trained at least once 12.1% of our employees.



1. Employment and Engagement

Your Opinion... Recommendation

According to a survey conducted to our employees in 2020, 89% would not hesitate to recommend One Telecommunications to a friend seeking employment.

A. Depending on our employees

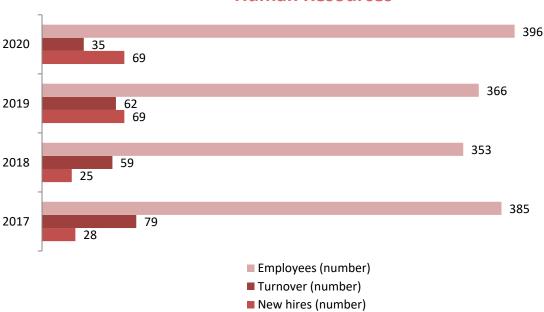
Operating in a constantly changing business environment, it is imperative for us to be recognized as an attractive employer, who creates the appropriate opportunities for personal and professional development, establishes a healthy and safe work environment and respects employees' human rights and diversity.

Therefore, our Policy on Employee Relations, which applies to all employees, addresses the following topics:

- Recruitment and development.
- Responsible management of organization changes.
- Health, safety and sustainability.
- Remuneration and rewarding.
- Work-life.
- Leadership.
- Diversity.
- Prohibition on discrimination and harassment.
- Engagement and communication.
- Labor and industrial relations.

B. Maintaining job positions

We directly occupy 396 employees, while our business activity has supported the creation of additional indirect job positions in Albania.



Human Resources





Human Resources ⁽¹⁾										
Hierarchy	Chief Executive Officer / Directors	Upper Level Managers	Middle Level Managers	Employe	es ·	Total				
Employees (number)	7	21	73	295		396				
Employment Type	Permanent	Temporary		Full time	e Pa	rt time				
Employees (number)	384	12 (6 women)		396		0				
Gender	Female	Male								
Employees (number)	236	160								
Age	<30	30-50		>50						
Employees (number)	82	298		16						
Categories	Nationalities	Disabilities		Expats						
Number	3	0		7						
Education Level	Public School / High School	University Education		Postgraduate Education						
Employees (number)	12	348		36						
Employment Tenure	<5 years	5-10 years		>10 years						
Employees (%)	40	15 45		45						
Type of Work	Office	Retail Fieldwor		work/O	ork/Other					
Employees (number)	368	19		9						
New Hires	Female	Male		<30	30-50	>50				
Employees (number)	37		32	42	26	1				
Turnover	Female	Male		<30	30-50	>50				
Employees (number)	25	10		7	28	0				
Turnover	Resignations	Term	ination							
Turnover reason (%)	86		14							

(1) Data refer to 31/12/2020.

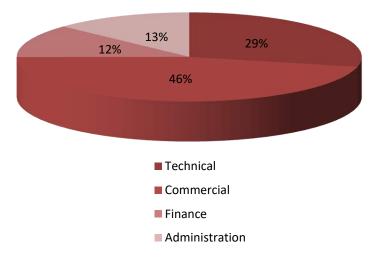
It must be noted that:

- The average headcount in was 381 employees, out of which 40.4% were men (154 employees) and 59.6% were women (227 employees), compared to average headcount of 351 employees in 2019, out of which 39% men and 61% women.
- There are no variations in employment numbers due to seasonality.
- The average age is 37 years.
- The average employment tenure is 8.4 years.
- Approximately 24% of employees are in management positions (e.g. Chief Officers, Executive Directors, Heads of Divisions, Heads of Departments, Heads of Sections).
- The average employee turnover rate was 8.8%, with the employee turnover rate for men and women employees being 6.5% and 11% respectively.
- There were 6 employees who left before completing 12 months of employment.
- There were 30 workers working in our premises, who are not our own employees, with 20 of them being security personnel and 10 working in the telesales team.

We employ 100% of our employees with full time employment contracts



Allocation of Employees per Function



C. Communicating with employees

√ Good Practice... Supporting Youth Employability

Responding to our commitment to support young people in their career planning and allow them to find a new job, we participated in 1 job fair, which was conducted online with EPOKA University due to COVID-19, during which we interviewed 15 candidates out of 30 participants (mainly young people) and created a candidate pool for future vacancies, without any of them hired and 7 selected for the internship program within 2020.

As we recognize the importance of effective internal communication, we utilize a wide range of means to maintain a transparent, continuous and interactive communication with our employees. Within 2020, we:

- Utilized various communication channels (e.g. articles on our corporate Intranet, e-mails to all employees) for various corporate and Corporate Responsibility issues, which included:
 - o Introduction of ONE Telecommunications, the Brand and its Values.
 - Guidelines on accepting gifts for Easter and Christmas.
 - World Day for Safety and Health at Work.
 - o Information about the COVID-19, such as governmental restrictions and obligatory measures.
 - Recycling of all stationary with the former corporate logo and colors (e.g. notebooks, pens, business cards, envelopes, bags, folders) and replacement with new stationary.
 - Participation in the Employee Engagement and Satisfaction Survey.
 - Registration of employees' children to an ICTSlab activity (see Subsection III-4C).
 - Participation to the 'A step for Durres' awareness marathon, with proceedings from participation fees used to renovate a public school in Durres which destroyed by the November 2019 earthquake.
 - Voting for new Health and Safety Committee members and reminder of the Committee's role.
 - Sent personalized electronic briefings (e-mails), for corporate and other issues.
- Sent electronic newsletters for recent news.

As a result of our practices, all employees have been informed at least once regarding Corporate Responsibility issues within 2020.

We informed all employees at least once regarding Corporate Responsibility issues



2. Health, Safety and Security

A. Ensuring Health and Safety

√ Good Practice... Responding to the COVID-19 Pandemic

Having as our main concern to protect our employees' health and mitigate the pandemic impact, we implemented measures, such as:

- Implemented our Business Continuity Management & Contingency Plan to ensure continuation of company activities.
- Applied and followed the relevant COVID-19 protocol, in accordance with the respective recommendations from Health Authorities.
- Enabled use of technological resources and provided company laptops to employees for remote work and online meetings (e.g. VPN access, online business communication platform).
- Arranged transportation for key company employees.
- Identified employees who had to work from office, in order to retain the minimum necessary number of employees in our premises.
- Purchased and provided the necessary personal protection equipment (e.g. protective masks, gloves, antiseptics and sanitizers) to our employees.
- Provided company doctor and equipped our medical room with the necessary medical and pharmaceutical equipment.
- Performed regular disinfections in corporate premises.
- Provided regular COVID-19 updates to employees, customers and business partners and implemented 5 internal information campaigns through articles posted on the company's Intranet, internal e-mails and social media within 2020, which were communicated to all employees:
 - Novel Coronavirus and COVID-19.
 - Coping with Stress during COVID-19 outbreak.
 - The communication campaign 'Spread the Word, not the Virus'.
 - Two updates on respective health protocols and personal protection (e.g. mandatory use of mask).

Despite our efforts, there were 169 employees who were diagnosed with COVID-19, including 1 serious employee infection (who fortunately totally recovered), with all cases addressed according to the Health Authorities' instructions.

36% of total mandays were conducted remotely

As we strive to ensure suitable work conditions and follow health and safety rules, in order to protect our employees, we:

- Exceed the requirements of the Albanian legislation and voluntarily adopt and comply with international recognized standards, namely the ISO 45001:2018 certification, based on Top Management commitment to apply and promote the best respective practices and standards, in order to become the best employer in the market.
- Describe in detail all parties, tasks and measures involved within the context of our Health and Safety Management System (based on the ISO 45001:2018 Occupational Health and Safety standard) in a handbook and procedural instructions, which have been signed by the executive management.
- Have certified all our operations according to the requirements of ISO 45001:2018 and all workers, activities and workplaces are covered by our Health and Safety Management System.
- Comply with the respective Albanian national laws and regulations for our Health and Safety Management System and the Health and Safety Policy.
- Have adopted a common Quality, Health and Safety and Environmental Policy, which illustrates our commitment to implement country regulations and shape a preventive culture for Health and Safety at work.
- Have established the Health and Safety Committee at Work, which represents all employees, consists of 4 appointed One Telecommunications representatives and 4 elected employee representatives and is responsible to implement health and safety measures, in accordance with the Albanian legislation in force. The Committee





meets quarterly with management representatives to discuss issues and processes related to improve health and safety at work.

- Conduct monthly and quarterly Workplace Safety Inspections on company premises through our Health and Safety Team, as well as annual Occupational Hazard Studies for each facility, following a standard methodology according to ISO 45001:2018 requirements.
- Have equipped our buildings and own shops with a First Aid Kit.
- Employ an Occupational Physician, who is available to assist employees in case of health issues.
- Measure noise, lighting, humidity and temperature levels in our headquarters and own shops.
- Conduct quarterly EMF measurements in our headquarters in Lapraka and Kashar, as well as in our own shops, whose figures are officially reported and published in our Intranet.
- Implement various health and safety trainings to our employees, such as:
 - A First Aid Training Program to all employees involved in jobs classified as difficult (such as working at height, working with electricity or within warehouses) and to all employees of the Emergency Response Structure (ERT).
 - A Working Safely at Heights Training program to all new employees involved with working at height, as well as an annual refresher training for all existing employees, which includes theoretical training and practical exercises, hands-on application of security techniques, demonstration and use of specialized equipment and rescue procedures.
 - A car on fire training program conducted to 15 employees in Lapraka parking lot.
 - A fire extinguisher training program conducted to 21 employees, as well as 13 security personnel and 5 canteen personnel.
 - A work safety training program conducted to 4 warehouse employees on working with loads forklift safety, safe storage precautions and use of personal protective equipment.
- Request input from participants in health and safety trainings to further improve our Health and Safety Management System, which we receive through the following sources:
 - Direct personal input from employees and workers.
 - Feedback questionnaires by employees and workers after the training.
 - Discussions with employees in the Health and Safety Committee.
- Utilize the feedback from participants in health and safety trainings to identify work-related hazards and assess related risks, through which employees and workers can report work-related hazards and hazardous situations or request not to or refuse to perform an activity due to health and safety concerns (e.g. potential injuries).
- Have established a comprehensive Accident–Incident Reporting system, which is maintained by the Occupational Health and Safety Team and covers event investigation, recommendations and statutory reporting.
- Monitor daily access in our premises in Lapraka and Kashar through access control cards issued to our employees and have installed HD DVR and cameras.
- Conduct fire emergency evacuation drills and training for each facility once per year, with 7 evaluation drills organized within 2020 in our headquarters and warehouse, as well as in all own shops.
- Perform quarterly and unscheduled health and safety checks in our premises and own shops, with a total duration of 72 hours in 2020.
- Conduct semi-annual personal protection equipment inspections for warehouse and Operation & Maintenance employees, with a total duration of 8 hours in 2020.
- Conduct on-site security surveys on antenna sites.
- Have configured and optimized the CCTV system installed in 176 sites to increase efficiency, with a 90% reduction of false alarms and subsequent reduction of security guards' workload. We check daily the system for issues and security problems and implement regular trainings to external partner personnel on the CCTV system's use.
- Inform our employees on health and well-being issues, through workshops, e-mails and Intranet articles.
- Have included health and safety issues in the Employee Satisfaction Survey, such as mental/physical well-being and work-life balance.
- Immediately take care of our employee's health in first aid treatment cases, such as small skin injuries from paper cutting and scratches, skin allergies and blood pressure measurements (mainly in young employees and pregnant women with low blood pressure).
- Provide an annual medical examination to all employees (including new hired employees) as part of our corporate Medical Examination program, which includes physical check-ups, health promotion tests and clinical examinations. During 2020, we performed the respective medical examinations to all our employees.





- Systematically assess the effectiveness of health and safety measures and we review the employee survey's results and the relevant performance indicators.
- Record and respond to physical security incidents, without any incident reported within 2020.
- Encourage our employees' ideas and comments to improve health and safety within the workplace or express their concerns through the dedicated e-mail address <u>health&safety@one.al</u> or contact directly the Occupational Health and Safety Team, without any comments, ideas or complaints submitted within 2020.

Security, Health and Safety Hallings			
Employees/Workers	Торіс		
Kitchen and Cleaning	Fire		
Kitchen and Cleaning	Evacuation		
Archive	Fire		
Archive	Evacuation		
Maintenance	Spillage control		
	Fire extinguisher		
	General security		
All own shops	Prevention of theft		
	Response to emergency situations		
	Security		
Conveite outpoorteor for buildings and share	Protection of life		
Security subcontractors for buildings and shops	Prevention of theft		
	refreshment training		
New employees	Security awareness		
New subcontractor employees	Security awareness		
Emergency Response Team members	Response to emergency situations		

Security, Health and Safety Trainings

To develop our annual plan for Health and Safety trainings, we evaluate the previous year's actions, such as inspection results and records of occupational accidents. Within 2020:

- We implemented technical health and safety inspections and occupational health inspections, with a total duration of 120 and 200 hours respectively, compared to 80 and 85 hours respectively in 2019.
- The average health and safety training reached approximately 1.9 hours per employee, compared to 1.6 hours in 2019, in the following training sessions:

Health and Safety T	Fraining Sessions
---------------------	--------------------------

	20	17	20	18	2	019	2	020
	Employees trained (number)	Employee training (hours)	Employees trained (number)	Employee training (hours)	Employees trained (number)	Employee training (hours)	Employees trained (number)	Employee training (hours)
Health & Safety topics in induction program	28	56	25	50	55	83	69	104
Emergency drills	335	355	330	330	229	229	171	171
Fire Protection and Emergency Preparedness Training – Incident Response Team	85	43	70	175	NR	NR	NR	NR
Tower climbing and	10	160	7	112	10	160	12	192

rescue								
Working with electrical equipment and installments	14	112	11	88	9	72	13	104
First Aid training	52	364	35	245	NR	NR	NR	NR
Shop security	32	16	17	10	12	12	15	15
Occupational health and safety awareness sessions	146	24	75	75	NR	NR	300	150
Occupational health and safety awareness session – Working on Warehouse	7	7 (1)	7	7 ⁽¹⁾	0	0	0	0
TOTAL		1,130		1,085		556		736

(1) Duration not included in the total health and safety training hours as courses were conducted to contracted employees, not One Telecommunications employees.

NR: Not Reported



Average health and safety training (hours/employee in average headcount)

We increased average health and safety training hours by 18.8%

B. Monitoring our performance

The results of the above approaches are reflected in the following table, where incidents related to Health and Safety are summarized. It must be noted that:

- There are no employees with high incidence or risk of disease associated with their work, while there were no occupational diseases among our employees.
- There were no complaints or legal actions for health and safety issues.
- There were no relevant fines or other non-monetary sanctions imposed by the respective authorities.



However, we regrettably have to report that we lost one 51-year old male employee due to heart attack within 2020, working in our Network Operations & Implementations Department.

Health and Safety				
	2017	2018	2019	2020
Workforce days worked (days)	NR	NR	91,611	91,962
Hours worked (hours)	NR	NR	732,888	735,696
Men	NR	NR	286,056	297,368
Women	NR	NR	446,832	438,328
Work-related fatalities (number)	0	0	0	0
Employee fatalities	0	0	0	0
Collaborators' fatalities	0	0	0	0
Work-related accidents (number)	0	0	0	0
Calendar days lost due to accidents (number)	0	0	0	0
Employee injuries (number)	0	0	0	0
Men injured	0	0	0	0
Women injured	0	0	0	0
Missed absentee days (number)	1,148	1,030	1,029	951
Missed absentee days to workforce days worked (%)	1.16	1.17	1.12	1.03
Fatality Rate (rate) ⁽¹⁾	NR	NR	0	0
Men	NR	NR	0	0
Women	NR	NR	0	0
Injury Rate (rate) ⁽²⁾	0	0	0	0
Men	0	0	0	0
Women	0	0	0	0
High-Consequence Injury Rate (rate) ⁽³⁾	NR	NR	0	0
Men	NR	NR	0	0
Women	NR	NR	0	0
Occupational Diseases Rate (rate) ⁽⁴⁾	0	0	0	0
Men	0	0	0	0
Women	0	0	0	0
Lost Day Rate (rate) ⁽⁵⁾	0	0	0	0
Men	0	0	0	0
Women	0	0	0	0
Absenteeism Rate (rate) ⁽⁶⁾	290	293	281	259

(1) Fatality Rate (FR): (Number of fatalities due to work-related injury/Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees.

(2) Injury Rate (IR) = (Total number of injuries and fatalities/Total hours worked) x 200,000. The data do not include minor (first aid level) injuries.

(3) High-Consequence Injury Rate (HCIR): (Number of high-consequence injuries excluding fatalities/Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees.

(4) Occupational Diseases Rate (ODR) = (Total number of occupational diseases cases/Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees.

(5) Lost Day Rate (LDR) = (Total number of lost days/Total hours worked) x 200,000. The factor 200,000 is derived from 50 working weeks of 40 hours per 100 employees. Lost days are calculated as scheduled work days. Lost days count begins on the day of the injury or the next day, depending on the time of the day that the injury occurs.

(6) Absenteeism Rate (AR) = (Total number of missed absentee days/Total number of workforce days worked) x 25,000. The factor 25,000 is derived from 50 working weeks of 5 days per 100 employees. This rate is not monitored per gender.

NR: Not Reported

We had no accidents within our workplace

3. Fairness and Diversity

Your Opinion... Diversity

According to a survey conducted to our employees in 2020, 91% believes that One Telecommunications values

diversity (e.g. age, gender, ethnicity, language, education qualifications, ideas and perspectives) and 93% that One Telecommunications has a work environment that is accepting of diverse backgrounds and ways of thinking.

A. Appraising employees

In order to identify strengths and areas for improvement, we use a Performance Appraisal System, which is available to all employees through the company's Intranet. The System:

- Aligns with our Code of Conduct.
- Has been designed with an emphasis on Customer Experience Excellence.
- Is based on specific and measurable objectives, professional competencies and performance criteria, which are revised as often as necessary to reflect current standards in the telecommunications sector and the corresponding required expertise.
- Takes into account Corporate Responsibility principles, such as treatment of employees with respect and integrity.
- Includes Top Management Performance Evaluation by superiors.

Every year, each employee's performance is evaluated by their direct supervisor, based on pre-defined objectives. It must be noted that, prior to the annual performance appraisal process, all newly appointed managers attend tailormade trainings, in order to:

- Assess the annual performance appraisal process.
- Create an individual development plan based on their needs.

Within 2020:

- 13 managers and supervisors attended the training program on the performance appraisal process.
- 100% of our employees, who fulfilled the criteria of the respective appraisal procedure (i.e. employees not in long leave during the entire year and new hired employees), have been appraised.

We assessed 100% of applicable employees

B. Establishing a fair work environment

√ Good Practice... Respecting Diversity

According to our Code of Conduct, we respect the individuality of our employees and cultivate individual and cultural diversity. As a result, we do not tolerate any form of unlawful discrimination or harassment within our company or in our business relationships. It must be noted that all One Telecommunications employees have the right and opportunity of one-to-one counseling with the Human Resources Department regarding any discrimination issue.

Our commitment towards meritocracy follows the principles of respect for human rights, fair employment, prevention of child or forced labour, non-discrimination, equal treatment for women and men, in decisions related to employment aspect (e.g. salaries), as expressed through:

- The national Labour Code and relevant regulatory framework which prohibits the use of child and forced labour.
- The company's Code of Conduct and Employee on Labour Relations Policy, which prohibits unlawful discrimination or harassment due to age, gender, religion, competence, origin, cultural background or sexual orientation.
- The company's Employee Manual, which highlights principles and guides employee behavior.
- The United Nations Global Compact, which we have signed.

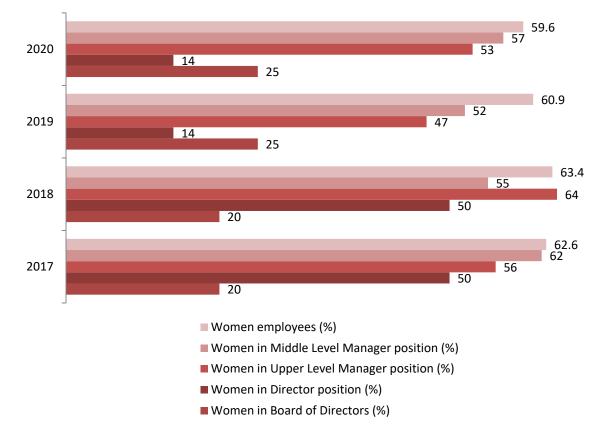


Based on these principles:

- Under no circumstances, will we employ any individual below the legal age limit (as defined by the Albanian legislation).
- We commit ourselves not to follow, or even tolerate, coercive work in our premises.
- We state in our contract agreements that suppliers must not occupy individuals below the legal work age or tolerate practices of physical harassment and exploitation or use of coercive work in any of their premises.
- Our Sales Area Managers and Trainers continuously visit and conduct audits in our sales network to ensure that employees in shops are above 18 years old.

Within 2020:

- The percentage of women in management positions (e.g. Chief Officers, Executive Directors, Heads of Divisions, Heads of Departments, Heads of Sections, Heads of Units) was 53.4%.
- There were no operations identified as having significant risk for incidents of child labour or forced and compulsory labour.
- There were no significant investment agreements and contracts with clauses on human rights.
- There were no complaints or grievances regarding discrimination incidents or unfair treatment or human rights violation or labour practices.
- There were no legal actions regarding human rights issues or labour practices and no fines or other non-monetary sanctions were imposed by the respective authorities.
- There were 3 legal cases related to labour issues with former employees, which are currently pending.



Percentage of Women

We maintained the percentage of women employees to over 59% of total workforce



We increased the percentage of women in Middle and Upper Level Manager position to 57% and 53% respectively

Although we do not have an official policy to hire people from local communities, local employability is taken into account for certain positions which require good knowledge of the Albanian language and local environment.

Diversity in Management Structures					
2017	2018	2019	2020		
0	0	2	2		
3	3	1	1		
0	0	1	1		
5	5	3	3		
NR	NR	3	3		
NR	NR	1	1		
NR	NR	0	0		
NR	NR	3	3		
NR	NR	1	1		
1	0	4	4		
4	4	3	3		
20	17	19	20		
2	1	1	1		
	2017 0 3 0 5 NR NR NR NR NR 1 4 20	2017 2018 0 0 3 3 0 0 5 5 NR NR NR NR NR NR 1 0 4 4 20 17	2017 2018 2019 0 0 2 3 3 1 0 0 1 5 5 3 NR NR 3 NR NR 1 NR NR 1 1 0 4 4 4 3 20 17 19		

C. Offering fair salaries

Our Employee Manual and the Code of Conduct include the issue of fair remuneration, according to which we provide fair and equal salaries to men and women employees, which depend on position, qualification, individual performance, market competitiveness, experience, employment tenure within the company or the industry and local legal requirements and do not depend on the employees' gender.

As a result:

- The minimum salary was in all cases higher than the legal basic salary, as defined by local legislation.
- The proportion of salary for men and women is almost equal within similar hierarchical level, employee category or area of activity, with statistically insignificant variations, as salaries do not depend on the employees' gender.
- The ratio of annual total compensation for our highest-paid individual to the median of annual total compensation for all employees (excluding the highest-paid individual) is 65:1.

Our lowest employee salary is 23% higher than the legal ______basic salary _____





D. Respecting the right of association

We respect the right of employees to engage in collective bargaining and express openly and freely, individually or in groups their opinion, as described in our Employee on Labour Relations Policy and the internationally recognized principles of human rights. While there is no employee union within One Telecommunications:

- No operations in which the respective rights may be at significant risk have been identified.
- There are no contracts that have been part of any collective bargaining agreement.
- The minimum notice period regarding operational changes for our employees is at any case according to the respective legal requirements.
- Our employees did not participate in any strike or lock-out during 2020.

E. Ensuring confidentiality of employees' personal data

We respect the right of employees to safeguard their personal data and we implement various organizational and technical measures, which include:

- Compliance with the provisions of data privacy laws.
- Compliance with the Code of Conduct for the Protection of the Individual's Rights to Privacy in the handling of Personal Data.
- Hold personal documents (such as identification cards, passports or any other personal papers) only as long as it is necessary related to their employment and to determine remuneration.

As a result of our practices, within 2020:

- We did not receive any formal employee complaints regarding privacy issues or personal data security.
- There were no proceedings or investigations against the company related to confidentiality of employee personal data.

4. Training and Development

A. Developing employees

Your Opinion... Performance Management

According to a survey conducted to our employees in 2020, 79% believes that One Telecommunications manages performance in a way that does a good job in identifying their strengths and improvement areas.

Our priority is to develop our own employees and prefer to cover job openings from existing employees. All job vacancies are posted on the corporate Intranet and in OneHR Portal, to which all employees have access. As a result, the percentage of permanent job openings covered by internal candidates reached 1.5% within 2020, compared to 1% in 2019.

B. Training employees

Your Opinion... Training

According to a survey conducted to our employees in 2020, 73% believes that One Telecommunications actively supports the learning and development of its employees.

Induction training: Through our Induction Program, we familiarize our new colleagues with the:

- Code of Conduct and compliance issues.
- Corporate principles.
- Corporate structure.
- Corporate culture (including Corporate Responsibility).
- Group's internal policies and procedures.





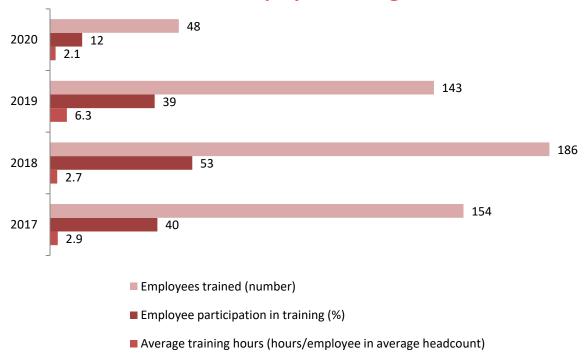
Within this context, we informed all new hired employees within 2020 about our operations and the proper communication channels to receive further information.

Training programs: As the need for qualified employees in the telecommunications industry will continue to grow in the coming years, One Telecommunications implements a wide range of training programs for its employees, either inhouse or external by experienced trainers and specialized training centers for professional training services in the ICT industry. Main training areas include:

- Project Management.
- Sales & Negotiations.
- New Products and Services.
- Leadership.
- New Technology.
- ISO Certifications.
- Microsoft Office Advanced.

The following data summarize the results of our training programs and overall performance, which does not include results of health and safety training programs. Within 2020:

- We conducted 12 training programs with a total duration of 816 hours (720 training hours from in-class training programs and 96 training hours from e-learning training programs), compared to 9 programs and 2,203 hours in 2019 (512 training hours from in-class training programs and 1,691 training hours from e-learning training programs), without however conducting any trainings on human rights.
- 96 employees participated in e-learning training programs.
- The average training cost per employee was €298, compared to €50 in 2019.



Employee Training⁽¹⁾

(1) Training data for 2018-2020 do not include health and safety training programs.



Breakdown of Employees Trained

2020		
		000

		2020	
	Employees trained (number)	Employee training (hours)	Average training per employee (hours)
Gender			
Men	36	608	4 (1)
Women	12	208	0.9 (1)
Hierarchy			
Managers	23	496	22
Employees	25	320	13
Type of work			
Office	26	576	1.6 ⁽²⁾
Retail	-	-	-
Fieldwork/Other	22	240	26.7 ⁽²⁾

(1) Average hours per employee on annual average headcount.

(2) Average hours per employee on 31/12/2020.

We trained at least once 12.1% of our employees

5. Life at Work and Rights

Your Opinion... Life at Work

According to a survey conducted to our employees in 2020:

91% are proud to be part of One Telecommunications.

79% believes that One Telecommunications motivates them to contribute more than is normally required to complete their work.

81% believes that their benefits plans are important in their decision to stay with One Telecommunications.

76% believes that their work-related stress is manageable for them.

A. Handling work-life balance

Indicating our commitment to maintain work-life balance and support our employees:

- We ensure that all employees receive their entitled leaves (such as paid leaves and sick leaves).
- We compensate overtime work.
- We do not force employees to work overtime, under the threat of any sanction (e.g. salary reduction or dismissal).
- All employees are entitled to maternity leave for childbirth and parental leave for childcare, which is considered and paid as working time and is available to working mothers or fathers immediately after the maternity leave has ended. It must be noted that child care leave is extended to working fathers under the same conditions, regardless of the type of activity performed by their spouse (e.g. self-employed), even if their spouse is unemployed.

Within 2020:

- There were no complaints or grievances regarding our employees' labour conditions.
- 96.4% of employees received their annual leave, as initially planned.
- 66% of employees worked at least once beyond the typical work hours and all overtimes were paid.
- The average annual overtime work was 40 hours per employee.

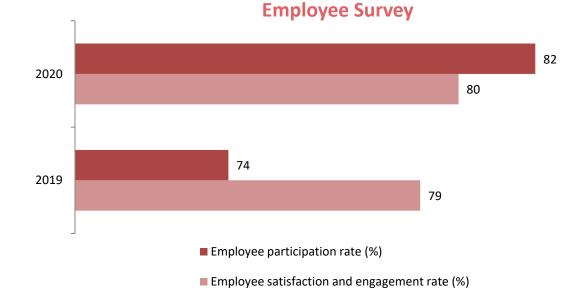




- All 17 women employees who received their maternity leave were still on maternity leave as of 31/12/2020 and all 4 women who started their maternity leave during 2019 returned to the company within 2020.
- 3 women employees were granted two less working hours per day due to raising a child until they are 1 year old.

B. Measuring employees' engagement

One Telecommunications considers its employees' engagement and satisfaction as necessary to enhance the feeling of belonging to the company and create a culture that supports and builds a powerful employer brand, in order to achieve the company's long-term objectives. We frequently collect, analyze and monitor our employees' opinion through our annual Employee Satisfaction and Engagement Survey, in order to identify areas for improvement and alert management about decisions regarding potential changes, improvements and action plans needed. Survey results are communicated through the corporate Intranet and discussed in meetings held at the organizational unit level.



Employee Survey

Positive	2019	2020
Engagement (%)	79	80
Brand (%)	89	86
Senior Leadership (%)	84	81
Supervision (%)	NR	88
Career Opportunities (%)	69	72
Learning and Development (%)	NR	76
Performance Management (%)	NR	78
Rewards and Recognition (%)	81	72
Collaboration (%)	91	82
Empowerment/Autonomy (%)	NR	80
Work Tasks (%)	NR	87
Enabling Infrastructure (%)	NR	81
Diversity & Inclusion (%)	NR	91
Talent and Staffing (%)	NR	78
Work-Life Balance (%)	68	72
NR: Not Reported		





C. Offering additional benefits

Besides salary and other benefits provided by law, our company offers employees an extensive additional benefits package to all employees, which covers the following categories. In principle, the company grants the same benefits with minor changes between employees in management positions and non-management positions.

Categories	Benefits
	Health and Accident Insurance Program
Health	Yearly check-up
	Gym and Fitness benefits for all employees
	Partial refunding of lunch
	Two canteens for employees in Tirana
Work Benefits	Flexible daily work attendance
WORK BEHEILS	Work from Home
	Seniority reward – extra days of annual leave for employees with 10 or
	more years within the company
	A Christmas gift for all employees' children up to 12 years old
Family	Retail Benefit Coupons to purchase goods in different local shops
Failing	Fuel Benefit
	Additional days of leave for special cases
	Allowance for corporate mobile phones and improved One Unlimited plans
	for free, as per employee level
	Preferential post-paid and pre-paid tariffs for employee family members
Products and Services	Reduced prices on mobile phones and accessories purchased through our
	own shops
	Bus service to transport employees to and from the company offices in
	Lapraka and Kashar
Other	Company credit card for Chief Officers
other	Access to various socio-cultural activities, through prize draw tickets

Employee Benefits

6. 2020 Achievements and Future Targets

We will	Ву
Offer the possibility to vaccinate against COVID-19 to all our own employees and sales partners	2021
Restructure and improve the yearly benefits' schema for each employee	2021
Reward and appreciate employees working in our company for 10, 15 or 20 years	2021
Promote healthy living and an active lifestyle	2021

VI. OUR ENVIRONMENT

Introduction and Summary

Our Size:

- 20,244 MWh electricity consumption for mobile network and buillings
- 1,047 tons CO₂ emissions (Scope 1 and Scope 2)
- 310,477 liters diesel consumption for mobile network
- 4.4 tons office paper consumption

35,000 biodegradable bags

Our Objective:

To successfully manage our direct and indirect environmental impact, as well as raise our fellow citizens' awareness to act more responsibly regarding environmental protection.

Our Achievements:

- Electricity consumption in our mobile network increased by 8.5%.
- Electricity consumption in our buildings increased by 5.5%.
- We reduced electricity consumption in own shops by 24.5%.
- We reduced diesel consumption by 21.6%.
- We improved our energy intensity and GHG emissions intensity by 19.9% and 36.1% respectively.
- We reduced our Scope 1 and Scope 2 carbon dioxide emissions by 18.1% (equal to 231 tons of CO₂).
- We forwarded for recycling 100% of lead batteries, oil-lubricants, WEEE materials and accumulators collected.
- We reduced the ODP of replenished refrigerants by 82.9%.



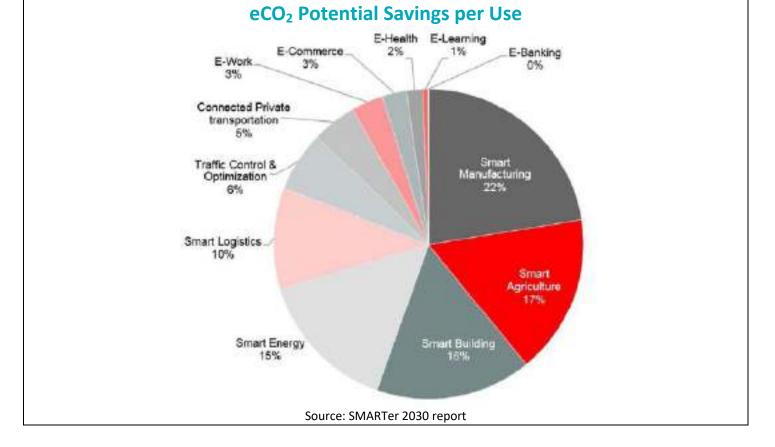
Your Opinion... Responsibility

According to a survey conducted to our employees in 2020, 87% believe that One Telecommunications is a socially and environmentally responsible organization.

? Did You Know... Climate Change and Environmental Protection

Climate change has been highlighted as one of the main future challenges, which urges companies and countries to take urgent action towards environmental protection. According to the 'SMARTer 2030' report by the Global e-Sustainability Initiative (GeSI), the international strategic partnership of ICT companies and industry associations, the adoption of ICT sector's solutions from other industries (in areas such as data collection, processing, presentation and dissemination, as well as networking and decision making) by 2030 can potentially:

- Retain emissions at 2015 levels and disrupt the pattern of 0.5% increase in CO₂ emissions for each 1% of GDP growth.
- Save over 300 trillion liters of water per year, mostly from smarter agricultural practices.
- Save 25 billion barrels of oil per year.
- Remove 135 million cars from circulation worldwide.
- Have nearly 10 times higher emissions savings than the sector's expected footprint.



A. Committing to environmental management

Since 2009, One Telecommunications started to analyze its activities, products and services, in order to identify and effectively reduce their environmental impact. As of 2011, the company implements an Environmental Management System (EMS) according to ISO 14001. Within this frame, we analyze our main activities and operations regarding their environmental impact and set objectives, determine indicators and implement initiatives, in order to improve our environmental performance.



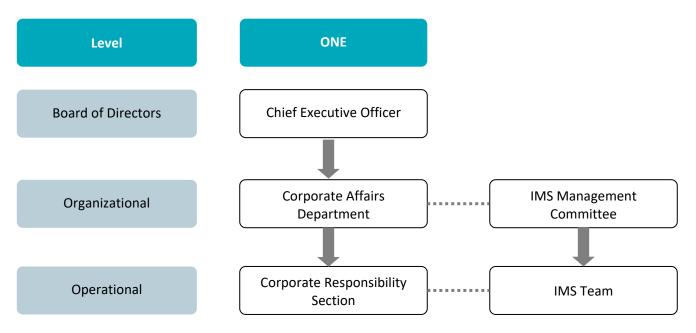


	Focus Area				
Reduce own Environmental Footprint	Energy Climate Change Raw Material: 5 Weste Water Corporate Fleet	EMF Biodivers Visual Imp Noise			
	Communication lusues	Employees	Gustamera	Suppli	
	Internal Communication Compagy	×			
A CONTRACTOR OF A	Recycling Programmes at Retail Stores	×	×		
Raise Stakeholders'	World Environment Day Langaum	x.	x		
Environmental Awareness	WWP's Earth Hour Competings	х			
	Promation of Environmental Programmes through Sponsorships	×	х		
	Supplier Evaluation Methodology			x	
Enabling Role of ICT Products and Services	E-oppticatio	to Business (fonogement mu für Custo i Servicen			

Environmental Strategy

To manage environmental aspects, One Telecommunications has created organizational structures, which ensure a high level of transparency in the respective programs.

Environmental Management System Structure



 The CEO oversees management of environmental aspects and is assisted by the Integrated Management Systems (IMS) Committee, who is responsible to approve the respective documentation (such as objectives and KPIs) and the environmental programs to achieve these objectives, EMS audit and performance results, as well as the necessary improvements to enhance the System's effectiveness.





- The Integrated Management Systems (IMS) Team supports the IMS Committee and consists of members from selected One Telecommunications organizational units, who are responsible to:
 - o Continuously monitor the environmental programs' implementation.
 - o Identify the environmental aspects of various activities.
 - o Analyze the necessary data to determine the company's environmental performance.
 - Propose remedial actions for improvement.
- Furthermore, One Telecommunications strongly encourages employee participation in its respective initiatives and programs.

B. Prioritizing environmental aspects

√ Good Practice... Respecting the Environment

In order to minimize potential negative environmental impact, One Telecommunications has introduced environmental aspects in the design and in-use phase of all BTS and acquires the necessary permits, which confirm that BTS:

- Are placed according to actual and future development plans.
- Comply with the EMF emissions approved by the Office of Protection from Radiation.
- Respect protected areas and the biodiversity.
- Are not located in historical and culturally preserved areas.

As part of One Telecommunications' ISO 14001 based Environmental Management System, the company systemically identifies and reviews its environmental impact and aims to improve environmental performance, structured around the following steps:

- Examine environmental aspects that can have a negative environmental impact, under three different scenarios: normal, abnormal and emergency situations. It must be noted that representatives from One Telecommunications' customers and community members have participated in this step, in order to ensure transparency and increase environmental awareness among its major Stakeholders.
- Determine each aspect's significance, based on well-known criteria considered important in the telecommunication sector.
- Design and implement programs for identified environmental aspects, which consist of an action plan, role and responsibilities, time schedule and targets.

Through the above procedure, One Telecommunications addresses the following aspects, based on their significance to its operations:

Environmental Aspects				
Activity	Environmental Aspects	Included in the EMS		
	Energy	٧		
Mobile Network	Technical Waste	٧		
	EMF	Х		
Support of Telecommunications Operations	Energy	٧		
	Hazardous Waste	٧		
	Energy	٧		
	Office Waste (Paper)	٧		
Offices, Shops, Warehouses	Waste Disposal	٧		
	Water	٧		
	Mobile Recycling	٧		
Vehicles	Energy	٧		

Environmental Aspects





Risks Associated With Climate Change

Risk	Description
Regulation risks	They often result to increased energy costs, due to new climate change regulations on national and global level, which affect almost the entire range of operations.
Physical, operational and financial risks	They often affect the company's telecommunications infrastructure, due to extreme weather events associated with climate change, as well as increased infrastructure expenses (e.g. need for additional cooling equipment).
Reputational risks	They result to potential loss of market share, due to customer reaction against companies with inadequate policies regarding climate change and environmental protection.

C. Expressing commitment to protect the environment

Policy... One Telecommunications Integrated Quality, Health & Safety and Environmental Policy

We, at One Telecommunications, complying with our values and strategic priorities, strive to enhance our successful customer-oriented philosophy, our competitive positioning and the provision of technologically advanced products and services.

As a responsible corporate citizen, we aim at delivering value to our stakeholders and believe that quality, healthsafety energy consumption and environment constitute crucial concerns embedded in our company's culture. In this context, we expect our senior management to act as role models.

Aiming at Business Excellence, we therefore commit ourselves to:

- Continually improving our operations and performance by setting, monitoring and reviewing our objectives with the intent to meet and, where possible, to exceed the expectations of our stakeholders.
- Acting with foresight and complying with the requirements laid down by applicable legislation, or even exceeding these, where we can.
- Ensure a sufficiently high level of security and data protection.
- Adopt an integrated approach to the efficient management of IT services.
- Require our personnel, and our contractors and suppliers, to actively participate in achieving our objectives, regarding the quality of our operations, occupational health & safety, rational energy consumption and environmental protection, by implementing all relevant regulations and programs adopted.
- Strive to find innovative approaches for our operations, products and services, adopting preventive approaches to reduce our environmental impact & pollution, to improve energy efficiency and avoid potential injury and ill health of our personnel, partners and the general public.
- Keep the public, our personnel and our stakeholders informed on quality, environmental, energy and occupational health & safety issues.
- Voluntarily protect the public through the principles and recommendations laid down in the EMF policy, including transparency, information, participation and promotion of science.
- Fully comply with the requirements of our Integrated Management System and continuously improve its effectiveness.





One Telecommunications' commitment to protect the environment is also expressed in its Integrated Quality, Health & Safety and Environmental Policy and is transformed into action through the development of environmental programs described within this chapter. It must be noted that in 2020:

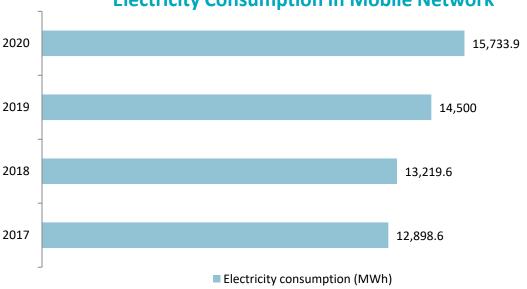
- We invested approximately €1,150 for environmental protection programs, which include the Environment Management Certificate maintenance and training for the Environmental Management System Internal Auditor.
- There were no complaints or grievances regarding environmental issues and no cases of non-compliance with environmental protection regulations.
- We did not receive any written notices by relevant authorities regarding environmental issues.
- We were not accused of violating any environmental legislation and there were no investigations or legal cases for non-compliance related to environmental issues.
- No relevant fines or other non-monetary sanctions were imposed during the scheduled and ad-hoc audits conducted by relevant authorities.

2. Energy and Climate Change

A. Measuring electricity consumption in mobile network

Reducing energy consumption in mobile networks is a challenging goal for any telecommunication company, as deployment of a mobile network requires construction of new Base Stations (BTS) and installation of new equipment. In order to reduce electricity consumption in its mobile network, One Telecommunications:

- Has 466 BTS connected in the electricity grid, compared to 448 in 2019.
- Replaced old equipment (e.g. indoor or outdoor rectifiers with higher efficiency) in 10 sites, which increased • energy efficiency by 5% on average.
- Has activated hybrid operation to reduce total working hours with electricity from the public grid (see Subsection VI-5B).
- Completed the Network Single Radio Access Network (SRAN) modernization project in 2019, in order to move from separate installations for each radio technology to single installations with a common transport and operational and management system, which allows the efficient use of the frequency spectrum, simplifies network architecture and facilitates efficient shared use of hardware.



Electricity Consumption in Mobile Network

The overall increase in electricity consumption in our mobile network is mainly the result of the increase in the number of sites, as our infrastructure in 2020 consists of more sites for our 3G, 4G and 4G+ networks, compared to previous years.

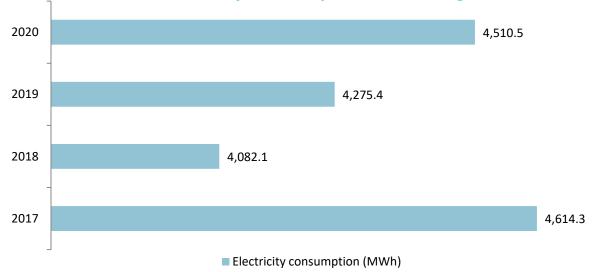




B. Measuring electricity consumption in buildings

As every company, we also consume electricity in our buildings (which include our offices and data centers) and therefore strive to reduce this impact through programs, as we:

- Have enabled Power Saving Mode in all desktop computers to shut down after a certain idle time, except for a few computers operating continuously.
- Have enabled turning off idle and decommissioned equipment inside our data centers (e.g. DNS servers, Excel switches).
- Have installed a smart automation feature to centrally control the office air-conditioning system.
- Have deployed the operation of an HVAC Centralized Intelligent Controller in three buildings in Lapraka and Kashar, in order to automatically and effectively control air conditioning and temperature setting, which also includes individual thermostats in each floor with fixed temperature for cooling and heating, as well as smart automation to start and stop the office air conditioning system.
- Have installed LED outdoor lighting in our premises in Lapraka.
- Have installed smart light switches to switch on/off our logo in all own shops and replaced all lamps with LED lights.
- Replaced 2 air-conditioning units with HVAC units in data centers.
- Implement employee awareness campaigns to reduce energy consumption, without however conducting a relevant campaign within 2020.



Electricity Consumption in Buildings⁽¹⁾

(1) Electricity consumption in buildings includes offices, data centers and own shops, namely 7 in 2017, 3 in 2018 and 2019 and 5 in 2020.

Electricity consumption in our buildings increased by 5.5%

We reduced electricity consumption in own shops by 24.5%

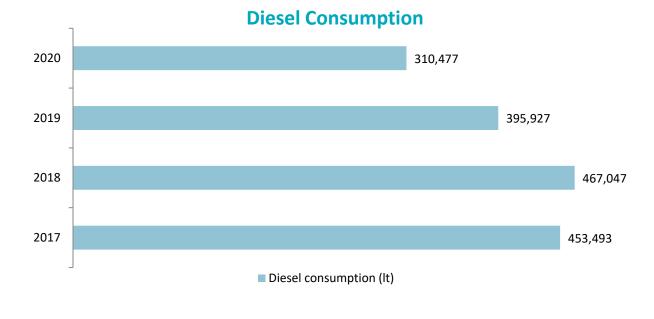


C. Measuring diesel consumption

We use diesel generators to produce electricity in cases electricity supply via the public energy providers is infeasible for periods of time or as the main electricity supply in isolated areas where grid connection is difficult or impossible. Aiming to reduce diesel consumption, we:

- Installed Remote Site Monitoring Systems in 197 sites, in order to decrease fuel consumption in sites equipped with stand-by Power Generator Systems.
- Constructed 1 medium voltage power line for existing sites and transformed them to sites with stand-by generators, instead of 24-hour continuously operating generators.
- Have activated hybrid operation to reduce total working hours from stand-by generators (see Subsection VI-5B).
- Implemented a maintenance program to over 206 generators for both 24-hour and emergency operation.

Total diesel consumption from generators reached 310,477 lt in 2020, which corresponds to approximately 3,104 MWh, compared to 395,927 lt and 3,958 MWh in 2019. The overall decrease in diesel consumption is mainly the result of the reduced use of generators to produce electricity, as they were used less frequently due to fewer power disruptions compared to 2019.



We reduced diesel consumption by 21.6%

D. Reducing transportation impact from vehicle fleet

Our company operates a number of vehicles, which are used to service and develop One Telecommunications' telecommunication network, distribute its products and service its customers throughout the country. In order to reduce the impact of this activity, we:

- Apply a system to monitor vehicle routes and record monthly information such as kilometers performed and fuel consumed.
- Regularly service the entire vehicle fleet to ensure compliance with the manufacturers' technical standards.
- Gradually replace company-owned vehicles with leased vehicles, which are newer and have lower energy consumption.
- Utilize a private-licensed contractor to daily transport employees to and from the company's headquarters.

By the end of 2020:

• We operated a service fleet of 55 vehicles and a company fleet of 25 vehicles, compared to 50 and 24 vehicles respectively in 2019.



• We use 4 owned vehicles and 76 leased vehicles, compared to 4 and 70 respectively in 2019.

Vehicle Fleet						
	2017	2018	2019	2020		
Total vehicles (number)	74	71	74	80		
Service diesel vehicles	45	44	47	8		
Service gasoline vehicles	3	3	3	47		
Company diesel vehicles	25	23	23	24		
Company gasoline vehicles	1	1	1	1		
Energy consumption from vehicle fleet (MWh)	1,068	906	879	875		
Fuel consumption (lt)	104,046	88,224	88,079	89,110		
Diesel	98,389	84,037	85,560	64,985		
Gasoline	5,657	4,187	2,519	24,125		
Average fuel consumption per vehicle (It)	1,406	1,242.6	1,190.3	1,113.9		
Average fuel consumption per vehicle per 100 km (lt)	8.1	9.2	NR	NR		
Vehicle distance (thousand km)	1,729.1	1,343.2	NR	NR		
Service diesel vehicles	1,251.6	998.1	NR	NR		
Service gasoline vehicles	33.3	20.1	NR	NR		
Company diesel vehicles	421.1	311	NR	NR		
Company gasoline vehicles	23.1	14	NR	NR		
Average distance per vehicle (thousand km)	23.4	18.9	NR	NR		

NR: Not Reported

E. Reducing other transportation impact

One Telecommunications strives to reduce the impact of business operations on climate change and commits to limit transportation impact due to business travel to the minimum necessary. Therefore, we:

- Use plane transportation only when travelling to other countries, without any plane travels during 2020 due to the COVID-19 pandemic.
- Utilize teleconference in company offices (audio conferences are available in most offices and there are two facilities for video conferences in the company's headquarters in Lapraka).
- Strive to resolve as many issues as possible (such as technical issues, telephone directions and connection issues) by phone.

F. Measuring GHG emissions

During 2020, One Telecommunications' overall energy consumption from its mobile network, buildings (offices, data centers and own shops) and vehicle fleet was 24,223 MWh and the company achieved an energy intensity of 1,017 KWh/terabyte, compared to 23,612 MWh and 1,269 KWh/terabyte in 2019. Direct and Indirect carbon dioxide emissions reached 1,047 tons in 2020, with a GHG emissions intensity of 43.9 kg CO₂/terabyte, compared to 1,278 tons and 68.7 kg CO₂/terabyte in 2019 (for Scope 1 and Scope 2 emissions).

GHG Emissions

l 7 2018	2019	2020
29 1,268	1,046	820
3 232	232	227
3 0	0	0
25 1,500	1,278	1,047
	1,500	25 1,500 1,278



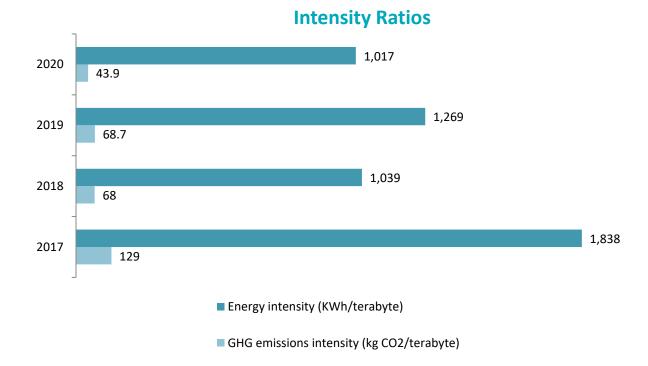
TOTAL (Scope 1, Scope 2 and Scope 3) (tons)	5,041	8,866	NR	NR
Use of leased products	0	0	NR	NR
Disposal and recycling of sold products	8	13	NR	NR
Use of sold products	20	4,231	NR	NR
Transport of products sold to customers (downstream)	773	51	NR	NR
Commuting to work	113	109	NR	NR
Business travel	41	22	0	0
Production waste	81	81	NR	NR
Purchased transport services (upstream)	110	109	NR	NR
Upstream energy and fuel supply chains	297	1,207	NR	NR
Capital goods	1,498	1,189	NR	NR
Purchased products and services	474	352	NR	NR
Other indirect emissions (Scope 3) (tons)				

(1) Sources of conversion factors: GHG Protocol GHG emissions from transport or mobile sources Calculation Tool V 2.6 May 2015 (Diesel, Gasoline).

(2) Electricity generation mix in Albania consists of 100% hydropower (IEA emissions factors).

Data refer to mobile network, offices, data centers and own shops (5 in 2020, 3 in 2019, 3 in 2018, 7 in 2017), as well as the entire vehicle fleet and flights for business purposes.

NR: Not Reported



We improved our energy intensity and GHG emissions intensity by 19.9% and 36.1% respectively

We reduced our Scope 1 and Scope 2 carbon dioxide emissions by 18.1% (equal to 231 tons of CO₂)





3. Materials and Waste

A. Consuming raw materials

At One Telecommunications we try to follow the principle 'Reduce – Reuse – Recycle' and therefore implement various approaches, depending on the type of materials:

- We monitor materials used.
- We reduce materials used.
- We reuse materials used.
- We recycle materials used.
- We properly dispose materials produced.

One Telecommunications has entered into contracts to recover and/or recycle used, faulty and end-of-life products and materials, such as toners, ink cartridges and lamps. The company only utilizes licensed contractors and certified waste management companies, in order to ensure that waste management is conducted in accordance with the respective legal provisions and international practices. All waste (including hazardous waste) is stored locally in our contractors' premises, until their quantities become feasible for transport, while there was no waste shipped abroad during 2020.

B. Using environmentally friendlier bags

We recognize the significant repercussions of plastic bags on the environment and we only use biodegradable bags in all of our shops, made of polyethylene with reverted technology, which degrade after a few years if not recycled completely.

Bags							
	2017	2018	2019	2020			
Plastic bags (units)	0	0	0	0			
Biodegradable bags (units)	85,000	85,000	0	35,000			
Paper bags (units)	0	0	0	55,000 ⁽¹⁾			

(1) Number refers to 09/2020-04/2021.

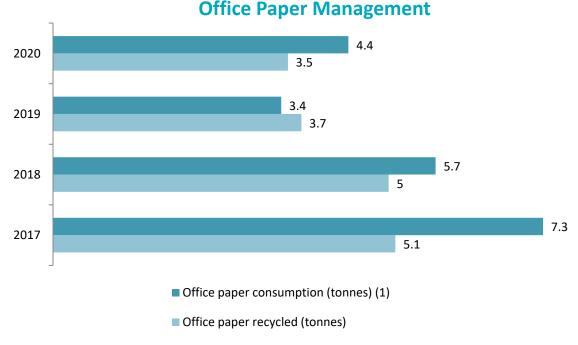
C. Managing paper and plastic use and recycling

We use office paper and plastic for various purposes, such as billing and promotional and communication campaigns and materials. In the last years, we have implemented various initiatives to reduce office paper and plastic consumption, as we:

- Offer free e-billing solutions to all customers and employees.
- Have embedded a paper saving message in the official e-mail signature of all company employees.
- Electronically exchange documentation, such as offers, purchase orders, contracts, qualification documentation and surveys.
- Have made our CR Reports available only in electronic form since 2011.
- Have developed an internal e-mail communication policy.
- Use only centralized printers (one per each floor in each building).
- Have set two-sided printing as the default printing option for all employees since 2014.
- Offer pre-paid customers the option to charge their accounts with e-vouchers and encourages its customers to do so, through bonus airtime to those who select this option.
- Implement internal awareness campaigns to reduce paper consumption, without however conducting a relevant campaign in 2020.
- Implement a paper recycling program with properly marked collection bins in all premises and own shops.
- Implement a plastic recycling program with properly marked collection bins in all office buildings and own shops, with 220 kg of plastic collected and recycled during 2019-2020.
- Do not use, at the moment, recycled paper or any other recycled materials.







(1) Office paper consumption for 2020 also includes paper consumption in own shops.

The overall increase in paper consumption is mainly the result of the major changes and investments during 2020, which affected our corporate documentation, compared to 2019.

✓ Good Practice... e-Billing Solutions

We strive to enhance the proportion of customers who utilize e-billing solutions to pay their bills electronically, in order to reduce office paper use for printing and post office paper use.

Payment of Bills via Web or App

	202	19	2020		
	My One mobile application	Website	My One mobile application	Website	
Transactions (number)	1,680	58	3,852	143	

D. Implementing responsible special waste management

Hazardous waste: We recognize the substantial or potential threats that hazardous waste may pose to public health or the environment and we consider its management as a highly important issue. As a result, we implement recycling programs for the following types of waste:

- Lead batteries, which are installed in many BTS and are activated in case of electricity supply interruptions. Batteries are replaced when their life span has expired, as lead is a hazardous material for the environment.
- Oil-lubricants, which are used in generators located in BTS and partially in office buildings. We cooperate with a licensed company to collect and forward for recycling the entire quantity of the rejected lubricants during generator maintenance.
- Oil, air and diesel filters.



Hazardous Waste Recycled

•				
2017	2018	2019	2020	
136	40	700	210	
100	100	100	100	
3.3	2.9	2.9	3.4	
100	100	100	100	
537	616	609	556	
654	616	609	547	
646	616	609	655	
	136 100 3.3 100 537 654	136 40 100 100 3.3 2.9 100 100 537 616 654 616	136 40 700 100 100 100 3.3 2.9 2.9 100 100 100 537 616 609 654 616 609	

Technical waste: The daily operations of all telecommunication companies generate different types of technical waste, which include:

- Telecommunication equipment (Waste Electrical and Electronic Equipment WEEE), such as end-of-life electronics and electrical devices (e.g. antenna parts, rectifiers, transceivers), which are forwarded for recycling.
- Accumulators, which are used as energy storage devices. Before forwarding them to recycle, we test them to determine their operational status during their storage in our warehouse upon de-commissioning.
- Mobile phones, batteries and accessories, for which we implement a recycling program since 2014, with properly marked collection bins in all office buildings, as well as in own shops for all employees and customers. It must be noted that One Telecommunications is the only company in Albania with a recycling program for mobile phones, batteries and accessories.

Technical Waste Recycled

	2017	2018	2019	2020	
Telecommunication, IT and other equipment (WEEE) (tons)	23.3	35.5	155.9	57.7	
Telecommunication, IT and other equipment (WEEE) (%)	100	100	100	100	
Accumulators (tons)	16	30.8	63.2	20	
Accumulators (%)	100	100	100	100	
IT hardware (tons)	0 (additional 4 TV sets were being processed for recycling)	4 TV sets	0	0	
Mobiles, batteries and accessories collected from citizens (kg)	0	0	0	0	

It must be noted that we donate outdated hardware used in company offices (such as computers, printers, monitors and other peripherals) to schools, institutions and NGOs, without however any hardware units donated to organizations in 2019 and 2020.

We forwarded for recycling 100% of lead batteries, oillubricants, WEEE materials and accumulators collected



4. Electromagnetic Fields

? Did You Know...Specific Absorption Rate

Mobile telephony functions are based on the emission of electromagnetic waves. Every mobile phone emits radio frequency electromagnetic energy, which can be measured through the Specific Absorption Rate (SAR) in watts per kilogram of body weight (W/kg). The SAR value of a mobile phone indicates the maximum degree to which the head may absorb electromagnetic fields during a phone call with the device.

Since 1999, the EU Council has set a maximum limit of 2 W/kg for cell and smart phones, which applies to all European countries. All manufacturers are required to check and ensure that they comply with the limit value even at maximum transmission power for all phones and disclose the maximum values measured as 'SAR value' in their product manuals or user operating guides. In order to reduce their overall exposure, persons can keep their mobile device away from the head and body, through:

- Using an earpiece (wired or Bluetooth).
- Using the loudspeaker function, including video calls.
- Placing the device on a surface when sending data.
- Texting instead of calling.

A. Following the Precautionary Principle

Policy... Electromagnetic Fields

Indicating our commitment to address the genuine public interest in the mobile communication technology, we have developed the respective EMF policy, through which we:

- Establish internal responsibilities and flows of activities to handle any complaints and enquiries on technology, health and other related issues.
- Support the establishment of a National Database on locations with EMF emissions.
- Comply with the national safe exposure guidelines and the ICNIRP's and WHO's guidelines regarding EMF for all our BTS and provide all the necessary data to indicate our compliance to any interested party.
- Cooperate with our Stakeholders, in order to inform the general public and encourage local authorities to cooperate with mobile operators in relevant programs.
- Provide the manufacturers' information on SAR values for their mobile devices to our customers, through our website and shops.
- Cooperate with local authorities to handle enquiries from citizens related to network development.
- Fully support improvement of scientific knowledge regarding any EMF impacts to the public health.
- Continuously evaluate scientific data ourselves.

The potential effect of electromagnetic fields (EMF) on the human health has been the subject of extensive international research studies. The International Commission on Non-Ionizing Radiation Protection (ICNIRP) has set the respective limits for transmitter antennas and mobile phones, which have been recommended by the World Health Organization (WHO) and included with the relevant legislative framework. These organizations utilize the current scientific knowledge to repeatedly review the current limits and have confirmed the safe use of mobile technology, as the general scientific consensus is that there are no health risks associated with exposure to electromagnetic fields emitted by antennas and mobile phones below international standards. It must be noted that we:

- Conduct a radio emission study and an electromagnetic background study (when required) for all wireless telecommunication stations and mobile BTS within a 50-meter and 300-meter radius respectively.
- Have established a specific procedure to address enquiries, comments or complaints received from various communication channels (e.g. written communication, call center) regarding electromagnetic fields.
- Conduct scheduled and ad-hoc EMF radiation measurements by specialized employees from the Radio Transmission Department, using a specific methodology and our own equipment, without however conducting relevant measurements in 2020 due to inability to calibrate our equipment as a result of the COVID-19 pandemic restrictions.



B. Informing fellow citizens on EMF

We continuously try to identify ways in which citizens can be informed regarding how mobile telephony functions, in order to ensure that everyone can have access to credible and accurate information. During 2020, we continued our information campaign to correctly inform and improve the perception of our Stakeholders regarding mobile telephony technology and its relation to health. Within this context, we provide documented materials on our website to correct information regarding mobile telephony to citizens and customers. Furthermore, we:

- Trade only mobile phones that comply with the defined SAR exposure limits.
- Display the SAR value of every mobile phone sold in One Telecommunications shops in its respective price-tag.
- Provide information to reduce SAR exposure in the corporate website.

5. Other Impacts

One Telecommunications' environmental strategy includes monitoring of its performance related to a wide range of relevant aspects, in order to implement respective programs.

A. Assessing our visual impact

Despite telecommunications having a relatively small visual impact on the environment compared to other industries and sectors, we apply a number of practices such as:

- We build new BTS with smaller size compared to the old construction design.
- We locate BTS in installations in cooperation with the other mobile telephony companies. Within 2020, we increased the number of BTS shared with another operator to 102, compared to 101 in 2019.
- We seek to properly arrange constructions and equipment in new telecommunication infrastructure and perform the necessary modifications to the existing infrastructure, in order to blend well with the surrounding environment and reduce the overall visual impact.

B. Assessing our noise impact

The noise impact of One Telecommunications is insignificant, since:

- Our buildings are located within urban areas.
- We use generators in buildings only in cases of electricity failure.
- BTS powered by electricity have very low noise levels and BTS using generators are located in remote areas.
- We locate BTS in installations in cooperation with the other mobile telephony companies, which considerably decreases the overall noise impact.
- In urban areas, we use 'Closed Type Power Generator Systems', with noise levels of 64dB at 7m distance, while we use 'Open Type Power Generator Systems' in rural areas, with noise levels of 105dB at 7m distance, which comply with the respective legislative provisions.
- In cases where sound levels from generators should be reduced, we have installed noise isolation or hybrid systems, in order to reduce their operating time and reduce or eliminate the noise.
- We have installed noise isolation systems or replaced old ventilation and/or cooling systems with newer and more noise-efficient units, in order to reduce noise levels.

C. Assessing our impact on biodiversity

The influence of our activities on biodiversity is insignificant, however, we take this important environmental issue into consideration, as our company:

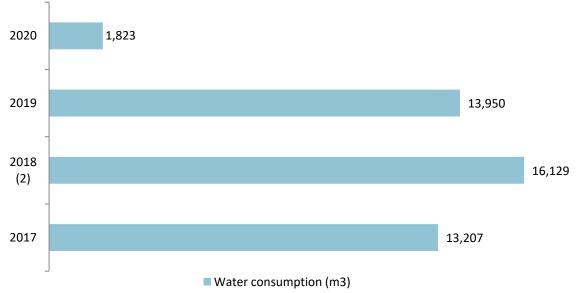
- Has not placed any of its facilities and operation sites near protected NATURA or RAMSAR areas or near other areas of high biodiversity value outside protected areas. As a result, there are no IUCN Red List species and national conservation list species with habitats in areas affected by operations.
- Builds BTS with the least possible repercussions on environment.
- Holds environmental permissions related to radiation for its BTS.
- Ensures that BTS located outside populated areas have small surface requirements and the land is reverted to its previous condition prior to BTS installation or the installation is left for the owner's use upon request, after the BTS has been de-commissioned.
- Does not generally staff its BTS on a permanent basis and ensures limited transportation activities to these sites.
- Restores potential negative repercussion, which our offices and BTS might have on the ecosystems.



D. Monitoring water consumption

We consume water solely for our employees' hygiene, watering of plants and cleaning of work areas. Water scarcity is highlighted as an extremely important environmental aspect, due to intensification of needs and demand for this precious resource during the last years. Our company is aware of its relative scarcity and therefore strives to reduce water consumption, where feasible.

- Water supply is performed exclusively from public water suppliers, who are also responsible for the sustainable withdrawal from the water resource system, and water is withdrawn only from one reservoir (located next to Tirana), with no water consumed from areas with high water stress; therefore, we do not affect other water sources.
- We have not identified water storage as having a significant water management impact, with the quantity of water stored in the 3 water deposits in our premises to ensure running water 24h/day being 11,000 lt in 2020, as in 2019.
- We have not set any minimum standards regarding quality of water and effluent discharges, as public water suppliers provide only one distribution pipeline and these parameters cannot be checked to approve or reject connection with the competent water authority.
- Bottles of drinking water are available for all employees and guests.
- We implement internal awareness campaigns to reduce water consumption, without however conducting a relevant campaign in 2020.
- We conducted spill drill training to 3 maintenance employees in Lapraka within 2020.
- All wastewater is directed to urban wastewater treatment plants through the sewerage system and is treated in the municipality wastewater facilities.
- At the moment, we do not recycle or reuse water for our operations.
- No water leakages were noticed.
- There were no planned or unplanned water discharges and no significant spills of chemicals or fuels or any other material.



Water Consumption⁽¹⁾

(1) Water consumption for 2017-2020 refers to the company's premises in Lapraka and Kashar.(2) Water consumption for 2018 has been restated.

The decreased water consumption in 2020 is not accurate due to faulty metering system during the year.



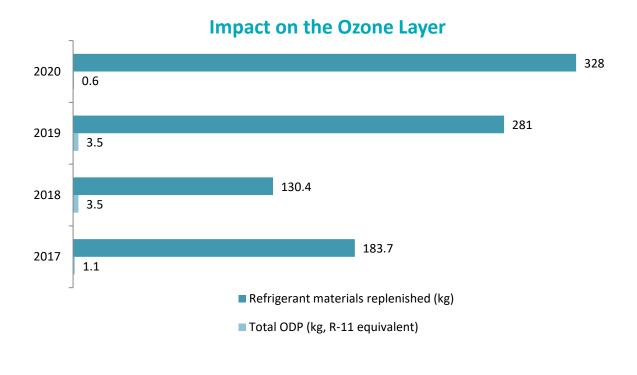


E. Monitoring our impact on the ozone layer

We use refrigerants in our premises, shops and BTS in the fire suppression system (which utilizes FM 200, a fire suppression agent from carbon, fluorine and hydrogen – CF_3CHFCF_3), fire extinguishers (which utilize CO_2) and the air-conditioning systems. During 2020, there was no quantity of FM 200 stored in all buildings and sites, compared to 60 kg in 2019, while there were no fire incidents in our premises and our BTS. Our objective is to reduce the average ODP of replenished refrigerants (namely R22), in order not to harm the ozone layer, which reached 0.6 kg R-11 equivalent in 2020, compared to 3.5 kg R-11 equivalent in 2019.

Refrigerant Materials Replenished⁽¹⁾ 2017 2018 2019 2020 20 63 R22 (kg) 63 11 R134 (kg) 46.5 0 0 0 R407 (kg) 59 23.4 14 34 204 283 R410 (kg) 58.2 44 TOTAL 183.7 130.4 281 328

(1) Data refer to all buildings and sites.



We reduced the ODP of replenished refrigerants by 82.9%

F. Promoting environmental awareness

Employee awareness: We recognize the importance of employee awareness about the environment, and therefore strive to adopt environmentally responsible behaviour within the workplace. To achieve this, we:

- Have included information about EMF in the Induction Program for all new employees.
- Implement internal awareness campaigns to reduce water and energy consumption, as well to promote the importance of recycling (see Subsections VI-2B, VI-3C and VI-5D).
- We have placed recycling bins in our offices and own shops, so that paper and plastic may be collected separately.





Public awareness: Besides our standing objective to reduce our own environmental footprint, we also aim to increase our customers' awareness to reduce their own environmental footprint. Therefore, we inform, sensitize and encourage participation of the general public through systematic initiatives within 2020, as we:

- Implemented our mobile phones, batteries and accessories recycling program (see Subsection VI-3D).
- Provided information to citizens on EMF (see Subsection VI-4B).

6. 2020 Achievements and Future Targets

We said	Progress	We will	Ву
Reduce electricity consumption in data centers and offices by 2%	0%	Reduce electricity consumption in data centers and offices by 2%	2021
Reduce electricity consumption in own shops by 2%	100%	Reduce electricity consumption in own shops by 2%	2021
Recycle 100% of WEEE materials withdrawn	100%	Recycle 100% of WEEE materials withdrawn	2021
Recycle 100% of accumulators withdrawn	100%	Recycle 100% of accumulators withdrawn	2021



C. INFORMATION ABOUT THE REPORT



1. Summary Table

INDICATOR	2018	2019	2020	PROGRESS 2020	FUTURE OBJECTIVE
OUR STRATEGY &					
MANAGEMENT					
Our objective is to incorporate responsibility into our business operations and daily management activities, as well as create measurable and tangible results to create value for our Stakeholders.					
GRI disclosures in the Report (number – full + partially)	70 + 12	NR	63 + 16		
Quantitative indicators in the Report (number)	260	NR	265	We increased by 1.9% the number of quantitative indicators we make reference to within the Report.	





Quantitative targets in the Report (number)	23	NR	13		Redefine KPIs and targets based on introduction of new operating systems and redesign/automation of daily operations and procedures.
Complaints regarding violations of our Code of Conduct (number)	0	NR	0	No violation cases concerning our Code of Conduct occurred. We have communicated our Code of Conduct to 100% of our	
Employees trained on anti- corruption (number)	292	0	0	employees. We trained over 85% of new hired employees on Compliance and Anti- bribery Policies.	
Corruption incidents (number)	0	NR	0	We had no incidents of corruption.	
Non-conformities regarding operation of Management Systems (number)	0	NR	0	We had no non- conformities from audits regarding the operation of Management Systems.	Further develop our Integrated Management System and certify according to BS PAS 99:2012 System Certificate.
OUR CUSTOMERS & SUPPLIERS					
Our objective is to develop products and services which are safe and correspond to the needs of our customers, as well as facilitate the responsible operation of the markets where we conduct our business.					
Population coverage (GSM coverage) (%)	99.8	99.8	99.8	We reduced the drop call rate on our 2G network by 37.9% and data drop rate on our 4G network by 50%.	
Territory coverage (GSM coverage) (%)	92.7	92.7	92.7		
Customer base (mobile only, excluding M2M) (million)	1.59	1.1	1.23		
Customer base (including M2M) (million)	NR	1.28	1.42		





Customer market share (%)	37.6	32.6	37		
Fines for anti-competitive	0	NR	0		
behaviour (number, value)	-		_		
Complaints received by	3,238	2,519	5,024		
customers (number)	-,	,	- / -		
Complaints resolved within 5	68.6	88.6	85.4	We resolved 85.4% of	
days (%)				complaints received	
, , ,				within 5 days.	
Average time to resolve	5.5	3.5	4.5	,	
complaints (days)			_		
Incidents related to privacy	0	NR	0	We had no incidents	Complete certification
issues or loss of personal data			-	regarding customer	of the Information
(number)				privacy issues or loss	Security Management
(of personal data.	System in accordance
					with ISO 27001.
				We successfully	
				blocked over 16,000	
				Internet security	
				threats.	
				We conducted	
				Information Security	
				Awareness Sessions to	
				27 employees, as well	
				as to 100% of new	
				hired employees.	
Suppliers (number)	281	448	448	We communicated	Conduct our Supplier
	201	110	110	our Supplier Code of	Evaluation Process.
				Conduct to all our	Evaluation recess.
				suppliers, with 100%	
				of them signing its	
				acceptance.	
Procurement expenses to	41	40	48	We increased the	
local suppliers (%)	71	40		percentage of	
				procurement	
				expenses from local	
				suppliers to 48%.	
OUR SOCIETY					
CONSCIENT					
Our objective is to combine					
our business success, with					
prosperity and quality of					
life, for citizens in local					
communities we conduct					
our business in.					
Revenues (million €)	69	68.8	68.1		
EBITDA (million €)	11.9	14.4	20.8		
Capital expenditures (million	9.3	18.1	26.1		
€)					
Total taxes (including VAT)	4.9	5	2.9	We distributed over	
(million €)				€107 million in	
		1	1		
				economic value: €7.8	



		1		I	
				€2.9 million for taxes, €65.4 million to	
				suppliers, €0.05 million	
				to society and €30.9	
				million for	
				investments.	
Payments to suppliers (million €)	63.4	70.4	65.4		
Cost of employees (including salaries, benefits and insurance payments) (million €)	6.5	6.6	7.8		
Investments (million €)	10.9	38.2	30.9		
Contribution to the Albanian State for taxes, insurance contributions and regulatory fees (thousand €)	7,808.3	31,179.7	7,243	We contributed over €7.2 million to the Albanian State for taxes, insurance contributions and regulatory fees.	
Value of social contribution (€)	68,603	64,756	45,409	Approximately 21.4% of our monetary social support was related to improving community infrastructure for public benefit.	
People supported through social contribution activities (estimated) (number)	238,621	32,375	10,935	The total time allocated to social support activities reached 908 work hours.	
Students in internship programs (number)	22	22	22	We provided internships to 111 students in the last four years.	Provide three-month paid internships to 20 students.
Volunteering activities (number)	2	2	0		
Volunteer employees (number)	20	22	0		
Working hours allocated to employee volunteer activities (number)	40	22	0	The total time allocated to volunteering activities during 2019-2020 reached 22 work hours.	
OUR EMPLOYEES					
Our objective is to create a work environment, which ensures long-term career opportunities and facilitates our employees' development.					





			-		
Employees (number)	353	366	396	We informed all	
				employees at least	
				once regarding	
				Corporate	
				Responsibility issues.	
				36% of total mandays	
				were conducted	
				remotely.	
Employees with full time	100	100	100	We employ 100% of	
employment contracts (%)	100	100	100	our employees with	
employment contracts (70)				full time employment	
				contracts.	
M(aman amployees (0/))	63.4	60.9	59.6	We maintained the	
Women employees (%)	03.4	60.9	59.0		
				percentage of women	
				employees to over	
				59% of total	
				workforce.	
Women employees in Middle	55	52	57	We increased the	
Level Manager position (%)				percentage of women	
				in Middle and Upper	
				Level Manager	
				position to 57% and	
				53% respectively.	
Women employees in Upper	64	47	53		
	04	47	55		
Level Manager position (%)	1.005	550	720		Duana ata kaaltku liuina
Training hours on health and	1,085	556	736	We increased average	Promote healthy living
safety issues (hours)				health and safety	and an active lifestyle.
				training hours by	
				18.8%.	
					Offer the possibility to
					vaccinate against
					COVID-19 to all our
					own employees and
					sales partners.
Work-related accidents	0	0	0	We had no accidents	
(number)	Ū	Ŭ	Ū	within our workplace.	
Work-related fatalities	0	0	0		
	0	0	0		
(number)	0		0		
Injury Rate (rate)	0	0	0		
Discrimination incidents	0	NR	0		
(number)					
Difference of lowest	+73.1	NR	+23	Our lowest employee	
employee salary to legal basic				salary is 23% higher	
salary (%)				than the legal basic	
, , ,				salary.	
Permanent job openings	35	1	1.5	, ,	
covered by internal		<u>-</u>	1.5		
-					
candidates (%)	400	4.42	40		
Employees trained (number)	186	143	48	We trained at least	
				once 12.1% of our	
				employees.	
Average training hours	2.7	6.3	2.1	employees.	
Average training hours (hours/employee)	2.7	6.3	2.1	employees.	





Employees with performance	100	NR	100	We assessed 100% of	
appraisals (%)				applicable employees.	
Employees entitled to benefits (%)	100	NR	100		Restructure and improve the yearly benefits' schema for each employee.
					Reward and appreciate employees working in our company for 10, 15 or 20 years.
OUR ENVIRONMENT					
Our objective is to successfully manage our direct and indirect environmental impact, as well as raise our fellow citizens' awareness to act					
more responsibly regarding environmental protection.					
Direct and indirect CO ₂ emissions (Scope 1 and Scope 2) (tons)	1,500	1,278	1,047	We reduced our Scope 1 and Scope 2 carbon dioxide emissions by 18.1% (equal to 231 tons of CO ₂).	
				We improved our energy intensity and GHG emissions intensity by 19.9% and 36.1% respectively.	
Total CO ₂ emissions (Scope 1, Scope 2 and Scope 3) (tons)	8,866	NR	NR		
Total electricity consumption (MWh)	17,301.7	18,775.4	20,244.4	Electricity consumption in our mobile network increased by 8.5%.	Reduce electricity consumption in data centers and offices by 2%.
				Electricity consumption in our buildings increased by 5.5%.	
	4 700	2.050	2.425	We reduced electricity consumption in own shops by 24.5%.	Reduce electricity consumption in own shops by 2%.
Total energy consumption from diesel for mobile network and buildings (MWh)	4,739	3,958	3,104	We reduced diesel consumption by 21.6%.	
Fuel consumption from vehicles (thousand lt)	88.2	88.1	89.1		
Transportation distance from vehicle fleet (thousand km)	1,343.2	NR	NR		





Γ				1	
Average fuel consumption	1,242.6	1,190.3	1,113.9		
(lt/vehicle)					
Distance travelled for	163,244	0	0		
business purposes (km)					
Ozone Depleting Potential	3.5	3.5	0.6	We reduced the ODP	
(ODP) of replenished				of replenished	
refrigerants (kg, R-11				refrigerants by 82.9%.	
equivalent)					
Consumption of	85,000	0	35,000		
biodegradable bags (number)					
Consumption of paper bags	0	0	55,000 ⁽¹⁾		
(number)			-		
Office paper consumption	5.7	3.4	4.4		
(tons)					
Office paper recycled (tons)	5	3.7	3.5		
Telecommunication	35.5	155.9	57.7	We forwarded for	Recycle 100% of WEEE
equipment (WEEE) recycled				recycling 100% of lead	materials withdrawn.
(tons)				batteries, oil-	
				lubricants, WEEE	
				materials and	
				accumulators	
				collected.	
Accumulators recycled (tons)	30.8	63.2	20		Recycle 100% of
					accumulators
					withdrawn.
Oil-lubricants recycled	2.9	2.9	3.4		
(thousand lt)					
Total phones and accessories	0	0	0		
recycled (kg)					
Water consumption (m ³)	16,129 ⁽²⁾	13,950	1,823 ⁽³⁾		

(1) Number refers to 09/2020-04/2021.

(2) Water consumption for 2018 has been restated.

(3) Water consumption is not accurate due to faulty metering system during the year.

NR: Not Reported





2. GRI Context Index, Global Compact, SDGs and ISO26000 Tables

The correspondence between the content of this Report and the Global Reporting Initiative's (GRI Standards 2016) General Disclosures, Management Approach and Topic-Specific Disclosures (including the respective Telecommunications Sector Supplement), as well as the Global Compact Principles, the Sustainable Development Goals, the ISO26000 International Guidelines, is presented in the following tables.

- Coverage of Indicators and GRI's Disclosures is characterized as Full (F), Partial (P) or Not Applicable (NA).
- General Disclosures of GRI required for 'Core' option are indicated in grey background.
- Management Approach, Topic Specific Disclosures and Boundaries for Material Topics (both for GRI related Topics and other Topics) are indicated in grey background on the Table, based on the Materiality Analysis conducted.
- No external assurance has been conducted for the Material Topics.

GRI Content Index

GRI Standard	Report Section	Coverage	Boundary of Disclosure
General			
Disclosures			
GRI 102: General Disclosures 2016			
Organizational Profile			Company
102-1	В	F	
102-2	I-4A, III-2A	F	
102-3	В	F	
102-4	B, I-2A	F	
102-5	I-3A	F	
102-6	I-2A	F	
102-7	I-2A,4A, IV-1A, V-1B	F	
102-8	V-1B	F	
102-9	I-4D, III-5A	F	
102-10	I-2C	F	
102-11	VI-1A	F	
102-12	III-4C,5B, V-3B, VI-4A	F	
102-13	I-5A	F	
Strategy			Company
102-14	A	F	
102-15	A, II-2A,5, III-6, IV-1A,5, V-6, VI-1A,1B,6, C-1	Р	
Ethics and Integrity			Company
102-16	I-2B, II-1A,2B, III-4A,5B, V-1A,3A	F	
102-17	II-1A	F	
Governance			Company
102-18	II-1B	F	
102-19	II-3A, VI-1A	F	
102-20	II-3A	F	
102-21	II-1B	Р	
102-22	II-1B	Р	
102-23	II-1B	F	
102-24	II-1B	Р	
102-26	II-1B,3A	Р	
102-27	II-1B,3A, VI-1A	F	
102-29	II-3A, VI-1A	F	
102-32	II-3B	Р	





102-33	II-1B	Р	
102-34	II-1B	F	
102-36	II-1B	Р	
102-37	II-1B	Р	
102-38	V-3C	F	
Stakeholder Engagement			Company
102-40	II-4C	F	
102-41	V-3D	F	
102-42	II-4C	F	
102-43	II-4C	F	
102-44	II-4C	F	
Reporting Practice			Company
102-45	B, IV-1A	F	
102-46	II-4A,4B	F	
102-47	II-4B, C-2	F	
102-48	B, VI-5D	F	
102-49	II-4B	F	
102-50	В	F	
102-51	В	F	
102-52	В	F	
102-53	В	F	
102-54	В	F	
102-55	C-2	F	
102-56	В, С-2	F	

Economic Topics

	This reference to GRI 103: Manage		· · · · · · · · · · · · · · · · · · ·
GRI 103: Management Approach 2016	Disclosures 103-1, 103-2, 103-3 app for all material topics within the Ecc		
	for all material topics within the Ecc	table.	on of this GRI Context Index
103-1	II-2B, III-1B,5A,5B,		
	IV-1A,3A,4A,4C, V-3B,3C, C-2	F	
103-2	II-2B, III-1B,5A,5B,	F	
	IV-1A,3A,4A,4C, V-3B,3C		
103-3	II-2B, III-1B,5A,5B,	F	
	IV-1A,3A,4A,4C, V-3B,3C	•	
GRI 201: Economic Performance 2016			Company
201-1	IV-1A	F	
201-4	IV-1A	F	
GRI 202: Market Presence 2016			Company
202-1	V-3C	Р	
202-2	V-3B	F	
GRI 203: Indirect Economic Impacts			Company
2016			
203-1	IV-4A	Р	
203-2	IV-3A,4A,4C	F	
GRI 204: Procurement Practices 2016			Company
204-1	III-5A	F	
GRI 205: Anti-corruption 2016			Company
205-2	II-2B, III-5B	Р	
205-3	II-2B	F	
GRI 206: Anti-competitive Behavior			Company
2016			
206-1	III-1B	F	
GRI 207: Tax 2019			
207-4	IV-1A, V-1B	Р	



Company

Company

Company

Company

Company

Company

Company

Company

Company

Environmental **Topics** This reference to GRI 103: Management Approach 2016 and the corresponding Disclosures 103-1, 103-2, 103-3 applies to all topic-specific Standards listed below, GRI 103: Management Approach 2016 for all material topics within the Environmental Topics section of this GRI Context Index table. 103-1 III-5B,5C, VI-1C, VI-2A-2F, F VI-3A-3D, VI-5C-5E, C-2 103-2 III-5B,5C, VI-1C, VI-2A-2F, F VI-3A-3D, VI-5C-5E 103-3 III-5B,5C, VI-1C, VI-2A-2F, F VI-3A-3D, VI-5C-5E GRI 301: Materials 2016 VI-3B,3C 301-1 Ρ 301-2 VI-3C F GRI 302: Energy 2016 302-1 VI-2A-2D F 302-3 F VI-2F GRI 303: Water and Effluents 2018 303-1 VI-5D F 303-2 VI-5D F VI-5D Ρ 303-3 303-4 VI-5D F 303-5 VI-5D F GRI 304: Biodiversity 2016 304-1 VI-5C F F 304-2 VI-5C 304-4 VI-5C F GRI 305: Emissions 2016 VI-2F F 305-1 F 305-2 VI-2F 305-4 VI-2F F 305-6 VI-5E F GRI 306: Effluents and Waste 2016 306-1 VI-5D F Ρ 306-2 VI-3C,3D 306-3 VI-5D F 306-4 VI-3A,3D Ρ F 306-5 VI-5D **GRI 307: Environmental Compliance** 2016 307-1 F VI-1C **GRI 308: Supplier Environmental** Assessment 2016 308-2 III-5C F Social Topics

GRI 103: Management Approach 2016	This reference to GRI 103: Management Approach 2016 and the corresponding Disclosures 103-1, 103-2, 103-3 applies to all topic-specific Standards listed below, for all material topics within the Social Topics section of this GRI Context Index table.	
103-1	II-2B,2D, III-1A,1B,2A,4A,4C,5B,5C, IV-4D,	F
103-2	V-1A,1B,2A,3A,3B,4B,5C, C-2 II-2B,2D, III-1A,1B,2A,4A-4C,5B,5C, IV-4D,	F





	V-1A,1B,2A,2B,3A,3B,4B,5C		
103-3	II-2B,2D,		
	III-1A,1B,2A,4A-4C,5B,5C, IV-4D,	F	
	V-1A,1B,2A,2B,3A,3B,4B,5C		
GRI 401: Employment 2016			Company
401-1	V-1B	F	
401-2	V-5C	F	
401-3	V-5A	Р	
GRI 402: Labor/Management Relations			
2016			
402-1	V-3D	F	
GRI 403: Occupational Health and			Company
Safety 2018			
403-1	V-2A	F	
403-2	V-2A	F	
403-3	V-2A,5C	F	
403-4	V-2A	F	
403-5	V-2A	F	
403-6	V-2A,5C	F	
403-7	III-5B	F	
403-8	V-2A	F	
403-9	V-2B	Р	
GRI 404: Training and Education 2016			Company
404-1	V-4B	F	
404-3	V-3A	F	
GRI 405: Diversity and Equal			Company
Opportunity 2016			
405-1	V-1B,3B	F	
405-2	V-3C	Р	
GRI 406: Non-discrimination 2016			Company
406-1	V-3B	F	
GRI 407: Freedom of Association and			
Collective Bargaining 2016			
407-1	V-3D	Р	
GRI 408: Child Labor 2016			
408-1	V-3B	Р	
GRI 409: Forced or Compulsory Labor			
2016			
409-1	V-3B	Р	
GRI 411: Rights of Indigenous People			
2016			
411-1		NA	
	-	No indigenous	
		people are present	
GRI 412: Human Rights Assessment			
2016		_	
412-2	V-4B	F	
412-3	V-3B	F	
GRI 413: Local Communities 2016			Company
413-1	IV-4A	P	
413-2	IV-4D	F	Canada
GRI 414: Supplier Social Assessment			Company
2016			
414-2	III-5C	F	Com
GRI 415: Public Policy 2016 415-1	II-2B	F	Company





GRI 416: Customer Health and Safety			Company
2016			
416-2	III-4C	F	
GRI 417: Marketing and Labelling 2016			Company
417-1	III-2B	Р	
417-2	III-2A	F	
417-3	III-2A	F	
GRI 418: Customer Privacy 2016			Company
418-1	III-4A	F	
GRI 419: Socioeconomic Compliance			Company
2016			
419-1	II-2B,2D, III-1A,1B,2A,4A,4C,	E	
	IV-4D, V-2B,3B	F	

001-1: Network reliability (rates)III-3CFCustomer SatisfactionCorr002-1: Customer satisfaction surveys (results)III-3AFNetwork Infrastructure and InvestmentCorr003-1: Network coverageI-4BFRisk and ComplianceCorr004-1: Written notices regarding compliance issues (by number, outcome)II-2DFSocial Products and ServicesCorr005-1: Products and services for vulnerable social groups (by number, type)IV-3AFBusiness ContinuityCorr006-1: Employees briefed through business continuity awareness sessions (percentage)II-2EF	
Disclosures 103-1, 103-2, 103-3 applies to all other material topics (not overed by GRI Standards), within the Other Topics (non GRI) so GRI Context Index table.103-1I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3C,4A,5A,5B,5D, C-2F103-2I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3C,4A,5A,5B,5D, C-2F103-3I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3A,4A, V-2A,5A,5B, 5DF103-3I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3A,4A, V-2A,5A,5B, 5DF103-3I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3A,4A, V-2A,5A,5B, 5DF103-3I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3C,4A,5A,5B,5DF103-3I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3C,4A,5A,5B,5DF001-1: Network reliability (rates)III-3CFCustomer SatisfactionCorr002-1: Customer satisfaction surveys (results)III-3AFCustomer Satisfaction surveys (results)III-3AFNetwork Infrastructure and InvestmentCorr003-1: Network coverageI-4BFRisk and ComplianceCorr003-1: Network coverageII-2DFSocial groups (by number, outcome)II-2DFSocial groups (by number, outcome)IV-3AFSocial groups (by number, type)IV-3AFSocial groups (by number, type)IV-3AFSocial groups (by number, type)IV-3AF	
103-1I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3A,4A, V-2A,5A,5B, VI-2B,3C,4A,5A,5B,5D,C-2F103-2I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3C,4A,5A,5B,5DF103-3I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3C,4A,5A,5B,5DF103-3I-2A,4B, II-2D,2E, III-2A,2C,3A,3C,3D,4B,4C,5C, IV-2B,3C,4A,5A,5B,5DF001-1: Network reliability (rates)III-3AF001-1: Network reliability (rates)III-3AF002-1: Customer SatisfactionCorr002-1: Customer satisfaction surveys (results)III-3AFNetwork Infrastructure and InvestmentCorr003-1: Network coverageI-4BFRisk and ComplianceCorr004-1: Written notices regarding compliance issues (by number, outcome)II-2DFSocial Products and ServicesIV-3AFSocial Products and ServicesIV-3AFSusiness ContinuityCorr005-1: Employees briefed through business continuity awareness sessions (percentage)II-2EF	isted below
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continuity awareness sessions (percentage)	npany
Internet Safety Cor	npany
007-1: Blocked Internet security threats (by III-4B F F type, number)	
EMF and SAR Cor	npany
008-1: EMF measurements and incidents of non-compliance with regulation and voluntary codes concerning VI-4A F electromagnetic fields (by number, outcomes)	
	npany





009-1: Availability of products and services	I-2A,4B, III-3C	F	
Responsible Buying	1 21,40,11 30	•	Company
010-1: Suppliers evaluation (by number, outcome)	III-5C	F	company
Access to Content			Company
011-1: Human rights issues (e.g. protection of minors)	III-2A,4C	F	
Product Affordability			Company
012-1: Reduced prices and discounts	III-2C	F	
Customer Relations			Company
013-1: Clarity of charges	III-2C	F	
013-2: Complaints received (by category, number) and resolved	III-3D	F	
Donations and Sponsoring			Company
014-1: People supported through social support activities	IV-4A	F	
Work Conditions			Company
015-1: Grievances about labour conditions filed, addressed, and resolved (number).	V-5A	F	
015-2: Employees with overtime work (by percentage, average)	V-5A	F	
Employee Engagement			Company
016-1: Employee satisfaction surveys (results)	V-5B	F	
Environmental Training and Awareness			Company
017-1: Employees briefed on environmental protection (percentage)	VI-2B,3C,5D	F	
Visual Impact			Company
018-1: Base Stations shared with other operators (number)	VI-5A	F	
Noise Impact			Company
019-1: Reduction of noise impact from Base Stations (practices)	VI-5B	F	





Global Compact Table

Issue	Principle	Report Section	Coverage
Human R	ights		
1.	Support and respect protection of internationally proclaimed human rights	III-5B, V-3B	F
2.	Ensure not to be complicit in human rights abuses	III-5B, V-3B	F
Labour St	tandard		
3.	Recognize freedom of association and right to collective bargaining	III-5B, V-1A,3D	F
4.	Eliminate all forms of forced and compulsory labour	III-5B, V-3B	F
5.	Abolish effectively child labour	III-5B, V-3B	F
6.	Eliminate discrimination in respect to employment and occupation	II-1A, III-5B, V-1A,3B	F
Environn	nent		
7.	Support a precautionary approach to environmental challenges	VI-1A,4A	F
8.	Promote greater environmental responsibility	III-5B, VI-1-5	F
9.	Encourage development and diffusion of environmentally friendly technologies	III-5D, VI-1A,3B,3C,4A,4B	F
Corruptio	on		
10.	Work against all forms of corruption, including extortion and bribery	II-1A,2B,2C, III-5B, IV-4B	F

ISO26000 Table (International Standard)

Aspect	Report Section	Coverage
1. Scope	II-3A,4A-4C	F
2. Definitions	C-3	F
3. Understanding Social Responsibility	II-3A,4A-4C	F
4. Principles of Social Responsibility	II-3A,4A-4C	F
5. Recognizing Social Responsibility and Engaging Stakeholders	II-3A,4A-4C	F
6. Guidance on Social Responsibility Core Subjects		
a. Organizational Governance	II-1A,1B,2A-2C	F
b. Human Rights	III-5B, V-3B	F
c. Labour practices	III-5B, V-3B	F
d. Environment	VI-1-5	F
e. Fair operating practices	II-1A, III-1A,1B	F
f. Consumer issues	III-1-4	F
g. Community involvement and development	IV-4A,4C	F
7. Guidance on Integrating SR throughout the Organization		
a. Enhancing Credibility	II-1-4, III-1-5, IV-1-4, V-1-5, VI-1-5	F
b. Communication	B, III-2A-2C,3A,3D, V-1C, VI-4B,5F	F





United Nations' Sustainable Development Goals Table

Goal	Principle	Report Section
1.	End poverty in all its forms everywhere	IV-1A,4A
2.	End hunger, achieve food security and improved nutrition and promote sustainable agriculture	-
3.	Ensure healthy lives and promote well-being for all at all ages	IV-4A, V-2A, VI-4A,4B
4.	Ensure inclusive and quality education for all and promote lifelong learning	IV-4A, V-4B
5.	Achieve gender equality and empower all women and girls	V-3B,3C
6.	Ensure access to water and sanitation for all	-
7.	Ensure access to affordable, reliable, sustainable and modern energy for all	-
8.	Promote inclusive and sustainable economic growth, employment and decent work for all	IV-1A, V-1B,3B,3C
9.	Build resilient infrastructure, promote sustainable industrialization and foster innovation	I-4B, II-2E, III-3C, VI-4A
10.	Reduce inequality within and among countries	IV-2B,4A, V-3B,3C
11.	Make cities inclusive, safe, resilient and sustainable	IV-4A
12.	Ensure sustainable consumption and production patterns	-
13.	Take urgent action to combat climate change and its impacts	VI-1-5
14.	Conserve and sustainably use the oceans, seas and marine resources	-
15.	Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss	VI-3A,3B,3C,5C
16.	Promote just, peaceful and inclusive societies	IV-4A
17.	Revitalize the global partnership for sustainable development	II-1-4, III-1-5, IV-1-4, V-1-5, VI-1-5



3. Glossary

Please pay attention to the following, frequently used terms:

Term	Refers to	
'Base Stations' or 'BTS'	The installations in a region (including transmission antennas), which are	
	used to transmit data or voice, from a mobile through the	
	telecommunications network.	
'Biodiversity'	The variety of living organizations in an ecosystem or in geographical area.	
'Broadband'	The wide bandwidth data transmission, which transports multiple signals	
	and traffic types and allows high-speed Internet access.	
'Business Continuity	The management approach, which proactively handles issues that a	
Management' or 'BCM'	company could face (e.g. disaster, crisis), in order to ensure continuation	
	of offered services and products.	
'Carbon dioxide' or ' CO_2 '	The gaseous chemical compound derived from the combustion of fossil	
	fuels (oil, gasoline, natural gas, etc.) and organic compounds (wood,	
	plastic, etc.), which contributes to the greenhouse effect.	
'Corporate Responsibility' or	The voluntary commitment of companies to include in their corporate	
'Sustainable Development'	practices economical, social and environmental criteria and activities,	
	which are beyond the legislative requirements and are related to their	
	impact on Stakeholders. The term refers to the current economic growth	
	that does not compromise the ability of future generations to satisfy their	
	own needs.	
'Customers'	The final users of One Telecommunications' products and services.	
'Electromagnetic Fields' or 'EMF'	The non-ionizing radiation emitted by mobile phones and base stations	
	(used to transmit data and voice).	
'Environmental footprint'	The total greenhouse gas emissions that arise directly (e.g. burning of fossil	
	fuels for heating) or indirectly (e.g. by the use of products) from a	
	company.	
'Global Compact'	The United Nations initiative to encourage companies to align their	
·	business operation with 10 universally accepted principles in the areas of	
	human rights, labour, environment and anti-corruption.	
ʻIII-2A', ʻVI-2B' etc.	The Area, Section and Subsection of this Report (e.g. used in the GRI,	
	Global Compact and Stakeholder Tables). For example, the term 'III-2A'	
	makes reference to Area III (Our Customers & Suppliers), Section 2	
	(Responsible Marketing) and Subsection A (Applying Responsible	
	Marketing practices).	
'International Commission on	The international institution which defines acceptable levels of non-	
Non-Ionizing Radiation	ionizing radiation levels.	
Protection' or 'ICNIRP'		
'International Labour	The United Nations agency which deals with labour issues, i.e.	
Organization' or 'ILO'	international labour standards, social protection and work opportunities	
-	for all.	
'International Organisation of	The largest organisation in the world to develop internationally accepted	
Standardisation' or 'ISO'	standards, such as ISO9001.	
'Internet'	The global system of interconnected computer networks that use	
	the Internet protocol suite (TCP/IP) to link devices worldwide.	
'Interactive Voice Response' or	The automated telephony system that interacts with callers, gathers	
'IVR' information and routes calls to the appropriate recipient. An IVR		
	(IVRS) accepts a combination of voice telephone input and touch-tone	
	keypad selection and provides appropriate responses in the form of voice,	
	fax, callback, e-mail and perhaps other media.	
'Organization for Economic Co-	The intergovernmental economic organization with 35 member countries	
operation and Development' or	to stimulate economic progress and world trade.	





'OECD'	
'Report'	The Corporate Responsibility Report 2020.
'One Telecommunications', 'company' or 'we'	One Telecommunications SH.A (which this Report refers to).
'Universal Declaration of Human Rights'	The declaration adopted by the United Nations General Assembly in 1948 with the fundamental rights to which all human beings are inherently entitled.



4. Feedback Form

1. To which Stakeholder group do you belong?

Customers	Sales network	Suppliers	Employees
Government & Authorities	Local communities	Citizens	🗌 NGOs & NPOs
Media	Shareholders		
Other:			

2. What is your impression, about the following areas of this Report?

Area:	Excellent	Good	Neutral	Mediocre	Bad
II. Strategy & Management					
III. Customers & Suppliers					
IV. Society					
V. Employees					
VI. Environment					

3. What is your impression, about the following elements of this Report?

Element:	Excellent	Good	Neutral	Mediocre	Bad
Sections have the right balance					
Important topics are covered					
Structure supports easy reading					
Texts are comprehensive					
Quantitative elements are complete					
Graphs included are comprehensive					

4. Are there any topics, which are not covered (or not adequately covered) in this Report or do you have questions you would like to be answered in our next Report?

5. Are there any other comments/proposals you might have?

Personal Data (optionally):

lame:	
Drganization:	
Address:	
Phone/Fax:	
-mail:	

Please fill out the form and send it to:

One Telecommunications, Corporate Affairs Department Rruga 'Vangjel Noti', Laprake, Tirana, Albania E-mail: <u>info@one.al</u>

All information on this form will be used only to evaluate this Report, through statistical analysis. Personal data are protected, in accordance with the provisions of the respective legislation regarding private information.

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One

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