

AGREEMENT

In Athens, today the 13.12.2007 between the contracting parties, namely:

a) the S.A. (Société Anonyme) corporation trading as "WIND HELLAS TELECOMMUNICATIONS COMMERCIAL AND INDUSTRIAL S.A." with registered headquarters in Maroussi, Attica, Kifissias Avenue, no. 66, and legally represented by Mr Damianos Haralampidis, General Commercial Director,

b) the S.A. (Société Anonyme) corporation trading as "VODAFONE – PANAFON Telecommunications S.A." with registered headquarters in Halandri, Attica, and legally represented by

c) the S.A. (Société Anonyme) corporation trading as "COSMOTE MOBILE TELECOMMUNICATIONS S.A." with registered headquarters in Maroussi, Attica, Kifissias Avenue, no. 44, and legally represented by Mr Zacharias Piperidis, General Commercial Director,

the following were declared, agreed upon, stipulated and accepted by all parties:

To the "Code of Conduct for Mobile Value-Added Services and for the protection of underage users", which was signed by the mobile providers on 15/05/2006, Annex A' is added, which, verbatim, has as follows:

ANNEX A'

Memorandum for Safer Mobile Use by Children and Younger Teenagers

The European mobile providers and content providers have developed national and corporate initiatives to ensure safer use of mobiles including by younger teenagers and children.

Within this framework, European mobile providers, with the support of content providers, signed, as of February 2007, the European Memorandum for safer mobile use by children and younger teenagers, to present the minutes and to encourage all involved bodies, unions and businesses, to support safer mobile use.

Today and with the present document, the mobile providers in Greece adopt the abovementioned Memorandum, incorporating it as Annex A in the 2006 "Code of Conduct for Mobile Value-Added Services and for the protection of underage users", as follows:

We, the mobile providers in Greece, recognise:

- mobile services offer an additional way to consume content (still and video images, music, chat, etc.) already offered in other ways – typically by the same providers.
- the importance of parental oversight: accordingly, mobile providers should endeavour to empower parents with information and tools in order to facilitate their oversight.
- any initiatives to classify content should be based on national societal standards regarding decency, appropriateness and legislation.
- a framework-based approach to industry self-regulation will be effective in adapting to the fast moving environment of mobile technology and services, it will safeguard effectively safer mobile use by children and younger teenagers.

Mobile Providers in Greece – A Responsible Approach

It should be noted that:

Mobile providers only control commercial content they produce themselves or which they commission from professional third parties.

They exert indirect and retrospective control over commercial content in certain other situations, provided there is a contractual relationship with professional third parties.

They are not in a position to control content which is freely accessible on the internet, since there is no relationship between the mobile provider and the content provider.

However, as responsible companies, mobile providers recognise the need to work together with customers, parents and other stakeholders, including child protection organizations, in order to promote the safety of children and younger teenagers using mobile services.

Mobile products and services are offered to subscribers with various billing approaches (prepaid cards, contract/subscription or other hybrid approaches). The safer mobile use by children and younger teenagers must be ensured independently of the manner of billing of offered products and services.

Recommendations on Safer Mobile Use

Access Control Mechanisms

1. The commercial content under the mark of the mobile provider (own – branded content) which would be classified as only suitable for adults in equivalent media, must not be made available without providing appropriate access control mechanisms to parents and guardians.
2. The commercial content, which is supplied by professional third party content providers, contractually bound to the mobile provider, in cases this would be classified as only suitable for adults in equivalent media, it must not be made available without providing appropriate access control mechanisms to parents and guardian.

3. Additionally, every mobile provider must look into the possibilities of providing mechanisms, which can be used by parents to customise access to products and services by children using mobiles, such as: Specialised services and/or phones, barring, filtering, and/or billing control mechanisms.

Raising Awareness and Education

4. Mobile providers should provide advice and effective access to information regarding the use of mobile telephony services, as well as for the measures which can be taken by parents to ensure safer mobile use by their children.
5. The mobile service providers should encourage parents to discuss with their children ways of safer use of mobile services.
6. Mobile providers should ensure there are mechanisms, for reporting and complaining regarding content safety issues, which are available to customers.
7. Mobile providers should support awareness-raising campaigns designed to improve the knowledge of their customers, through organisations such the INSAFE¹ network.
8. For these measures to work effectively, all involved social and political bodies must be mobilised, so as to ensure the children's' awareness is improved through upgraded educational material and other methods, as, indicatively, appropriate and clear information to children and parents on safer use of mobile and the internet.

Classification of Commercial Content

9. Mobile providers and content providers must integrate commercial content into categories, based on societal standards regarding decency, appropriateness and legislation and the commonly accepted standards in equivalent media it is made available. There should be at least two categories: content which is suitable only for adults and other content.

¹ INSAFE is a network of national nodes that coordinate Internet safety awareness in Europe.

10. Mobile providers should ensure that their own-brand commercial content is appropriately classified according to the above.
11. Through their contractual relationships with professional third party content providers, mobile providers should ensure, after consultation, that these providers classify their commercial content under the same, as the abovementioned, classification approach.
12. For these measures to work effectively, all involved social, political, commercial and other bodies, should support mobile provider initiatives to ensure third party content providers classify their content according to the abovementioned classification.

Illegal Content in mobile products and services and/or on the Internet

13. Mobile providers will continue to work with the competent authorities for executing their legislative obligations regarding illegal content.
14. Mobile providers will support competent national authorities in dealing with illegal child images, and, through support networks (hotline) such as INHOPE² or equivalent approaches, will facilitate the notification of such content, where it is hosted on mobile community products and on the internet.
15. Mobile providers will support the creation of appropriate lawful procedures of taking-down such illegal content, committing to liaising with national authorities, as required.
16. For these measures to work effectively there should be legal clarity on the nature of illegal content, so that the competent authorities and bodies are able to recognise where specific items of content are illegal. For the implementation of the above, it is imperative that priority is given and that proportionate resources are allocated. The support of the government for this is vital.

² INHOPE is the International Association of Internet Hotlines.

Implementation, Stakeholder Consultation & Review

17. Signatory mobile providers will work towards implementation of the present document.

The mobile providers will regularly review child-safety standards, so that they are adapted to the developing technology and to societal standards, in cooperation with European and national bodies.

In witness thereof the present document was drafted into three (3) identical originals and each Contracting Party received one original.

THE PARTIES

1) For "WIND HELLAS TELECOMMUNICATIONS COMMERCIAL AND INDUSTRIAL S.A."

2) For "VODAFONE-PANAFON Telecommunications S.A."

3) For "COSMOTE – MOBILE TELECOMMUNICATIONS S.A."

Zacharias Piperidis
General Commercial Director