



SUSTAINABILITY REPORT 2020



ESGready
ENVIRONMENT
SOCIAL
GOVERNANCE

Sustainability in practice





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DEPA Commercial S.A. at a glance

As a responsible corporate citizen, DEPA Commercial undertakes activities and initiatives that contribute to the achievement of the following Sustainable Development Goals set by the UN:



About the Sustainable Development Report

The 2020 Sustainable Development Report of DEPA Commercial S.A. highlights all of the company's environmental, social and governance (ESG) achievements and initiatives. The purpose of the report is to inform all interested parties and social partners of DEPA Commercial S.A. about the non-financial performance of the company in the year 2020, in the above thematic pillars, simultaneously recording the creation of its long-term value and contribution to Sustainable Development.

Field of Reference and time period covered by the Report

This Sustainable Development Report is the first effort of DEPA Commercial S.A. to capture its Environmental, Social and Governance (ESG) performance, strategy and initiatives for the period 1/1/2020 to 31/12/2020. Mainly aiming to fully and comprehensively inform the interested parties of DEPA Commercial S.A., regarding the responsible operation practices applied and the non-financial performance of the company in the year 2020 in ESG matters, this Report has been drawn up in the context of Directive 2014/95/EU, the Green Paper of the European Commission and the 10 Principles of the United Nations Global Compact. Finally, this Report was drawn up with reference to the Standards of the Global Reporting Initiative Organization (GRI STANDARDS).

Contact regarding the Report

To facilitate the Company's Interested Parties, the 2020 Sustainable Development Report will be posted on the official website of DEPA Commercial S.A. at www.depa.gr, while for recording opinions and comments, a special electronic form is available to fill out. For more information and clarifications regarding the content of the Report, please contact the Social Responsibility team of DEPA Commercial S.A. Address: 92, M. Antypa, Heraklion Attica, Zip Code: 141 21, Tel.: 210 2701105, E-mail: eke@depa.gr.



For more than 30 years, DEPA has guaranteed the country's energy security and natural gas supply, aiming to improve the quality of life for consumers and strengthen the country's development path.

The corporate transformation into three distinct companies was completed in the milestone year 2020. The next decisive step was the design and implementation of a new business plan with a 2020-2024 horizon for DEPA Commercial S.A., envisaging its evolution from a gas company to an integrated energy company, with a high level of verticality. The new business plan includes initiatives at all levels and value-added investments that prepare us now for the future of energy. The driving force for the progress of the company, as the main supplier of energy providers, is the continuous expansion of the use of natural gas. We are actively contributing to this expansion by taking advantage of tomorrow's technologies, such as Small Scale LNG, and CNG, while planning to promote LNG as a fuel for the shipping industry. Moreover, DEPA Commercial S.A. is becoming synonymous with gas transportation by constantly expanding the network of FISIKON gas stations.

No one can ignore climate change and the policies designed and implemented for the transition into an energy neutral economy, when mapping the energy environment. Ambitious goals were set, regarding the replacement of fossil fuels with more environmentally friendly fuels initially -such as natural gas- and "greener" forms of energy from renewable sources. That is why we are investing in renewables with the aim of building a portfolio exceeding 250MW and focusing on the development of hydrogen, actively participating as a founding member of the European Alliance for Clean Hydrogen. Already within the first

year of implementation of the new business plan, the Company managed to develop its activities in conditions of intense competition and multiple challenges. The biggest challenge was clearly the COVID-19 pandemic, which brought about structural changes. DEPA Commercial S.A. has managed to absorb the turbulence created by the pandemic, and continue to respond in the best way possible to the increased needs of customers, while improving its overall footprint on the economy, society and the environment.

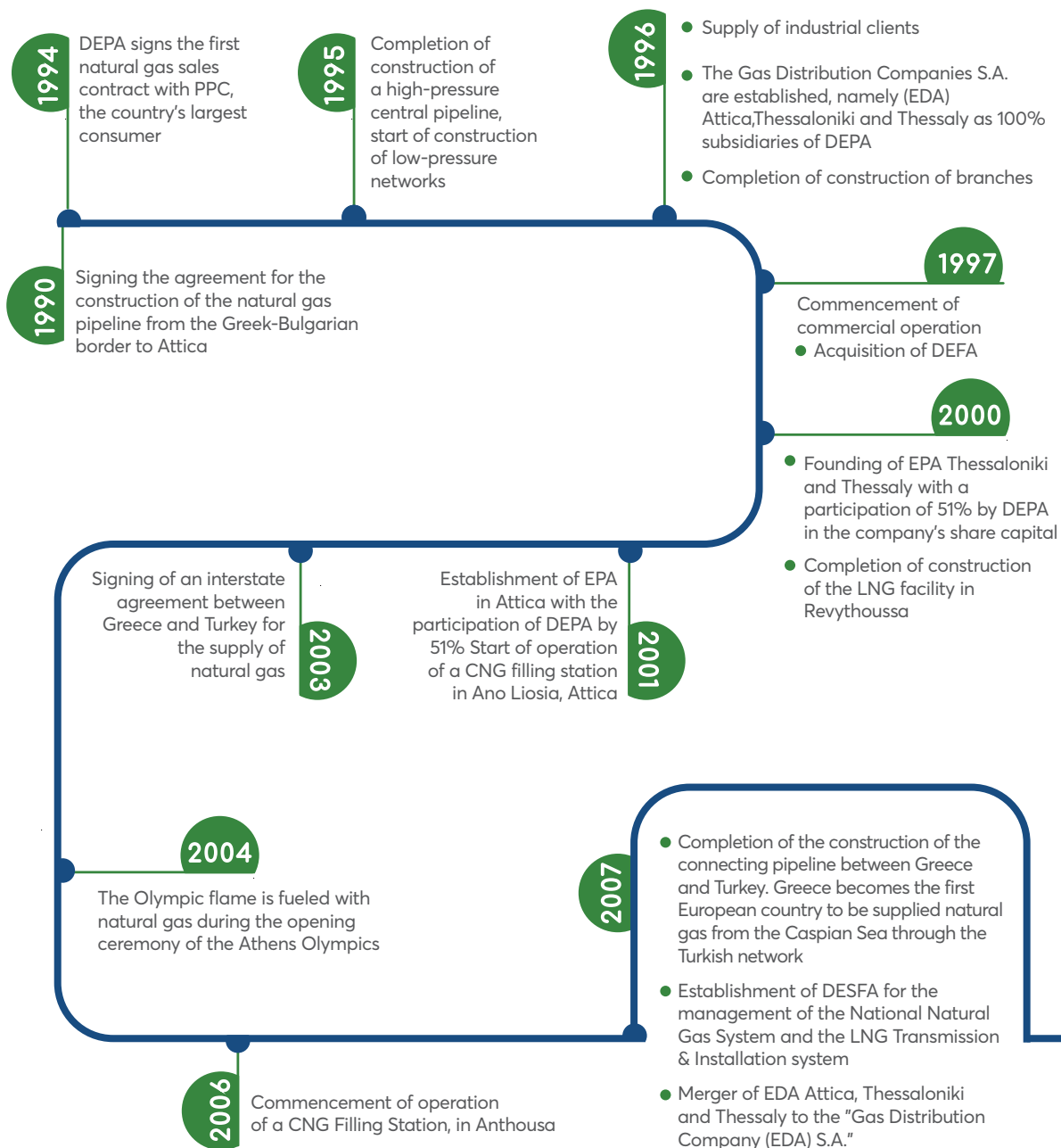
The Company leads the country's energy transition, actively contributes to the strengthening of Greece's energy security, claims an increasingly large market share, constitutes a development pillar with investments in infrastructure and new technologies, is a guarantor of the smooth supply and operation of the market and creates added value for all stakeholders by adopting modern standards of sustainable operation.

DEPA Commercial S.A. has a deeply rooted belief that in order for a company to have a future, it must operate responsibly. In this context, DEPA Commercial has incorporated ESG criteria and Sustainable Development standards into every area of its activity. With an ethical corporate governance, the Company builds a modern corporate culture, where respect for people, society, the environment and commitment to creating a positive footprint and added value all guide its actions.

Ioannis Papadopoulos
Chairman of the Board
of Directors

Konstantinos D. Xifaras
CEO

Historical Review



2014

- Signing of an agreement with GAZPROM EXPORT, to reduce the supply price and extend the current contract
- Agreement with GAZPROM EXPORT to impair the ToP quantities and reduce the Maximum Annual Contractual Quantity
- Launch of the European co-financed POSEIDON MED II program with the participation of DEPA as coordinator

2015

Legal and functional separation of the distribution and supply activities for DEPA and the subsidiaries of EPA Attica, Thessaloniki and Thessaly and, simultaneously, merger of the distribution and supply companies of Thessaloniki and Thessaly

2013

- Presentation in the Greek market of CNG for vehicles, FISIKON and development of a network of filling stations throughout Greece, in collaboration with EKO and BP
- Signing of a 25-year agreement with the Azeri State SOCAR and Shah Deniz 2 Consortium for the supply of natural gas
- Start of development of the EastMed project by DEPA and its subsequent adoption by "YAFA Poseidon"

2012

Start of Natural Gas Electronic Auctions

2011

Establishment of the ICGB AD for the development, construction and operation of the IGB. Signing of a Memorandum of Cooperation BEH EAD - DEPA - EDISON for the implementation of the IGB pipeline

2008

Establishment of "YAFA Poseidon S.A." for the development and implementation of the IGI pipeline

2017

- Establishment of the Distribution Company for the Rest of Greece (DEDA)
- Signing of Collaboration Agreements of "YAFA Poseidon" with Noble, Energean, INGL and TMNG to jointly explore the possibility of further developing EastMed
- Start of European co-financed program BLUEHUBS, with the participation of DEPA as coordinator

2018

DEPA contribution with a percentage of 20% in the share capital of GASTRADE for the development and construction of the Project "Floating LNG Terminal of Northern Greece" in Alexandroupolis

2019

- Start of European co-financed program SECUREGAS
- Start of European co-financed program CYNERGY
- Start of European co-financed program SUPERGREEN

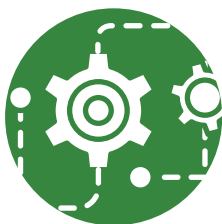
2020

The corporate transformation into 3 distinct companies was completed: DEPA Trade, DEPA Infrastructure and DEPA International Projects.



A) Corporate Transformation

In the year 2020, the corporate transformation into 3 distinct companies, namely DEPA Trade, DEPA Infrastructure and DEPA International Projects, was completed.



B) Business plan 2020-2024

According to the 2020-24 Business Plan, which envisages the expansion of its activities and its transformation from a natural gas company into an energy company that will provide a combination of energy products and services, DEPA Commercial S.A. submitted in November 2020 an application to RAE to acquire an Electricity Supply License. In the same context, the goal was set to create a "green" power portfolio of more than 240 MW, participating in photovoltaic or wind projects that are under development or in operation. This is an initiative that serves the national goals of delignitization and decarbonization.

C) Digital Transformation

Regarding the digitization of Procurement, the Company proceeded to the purchase of a software fully adapted to its business needs, in order to automate the relevant processes, increase the processing speed and productivity and at the same time provide the possibility of immediate information at all levels. At the same time, the Company has adopted and uses (more specifically its Procurement Department) an Electronic Procurement platform-application. The relevant configuration of the software has been completed and its trial operation is in progress, in order to put into full operation in the first half of 2021 an integrated system for monitoring purchase requests and homogenized management of contracts of the various Departments of the Company.



The new Management has successfully completed both the corporate transformation into three distinct companies (DEPA Commercial, DEPA Infrastructure and DEPA International Projects), as well as the preparation for their privatization. The Company's targeting was clear from the beginning: the support of the country's climate goals, the decisive contribution of DEPA Commercial to the modification of the energy mix and the continuous assurance of Greece's supply sufficiency. DEPA means "energy" and the Company's vision is to continue to offer it to Greek society in an economic, fair and environmentally friendly way. Moreover, the goal is to make DEPA Commercial a strong regional energy company, which innovates and evolves, so as to contribute decisively to the sustainable well-being of society and the environment.

Strategic targeting of the Company



maintaining its leading role in the liberalized, competitive domestic market



the utilization of Greece's geostrategic position and energy potential to create and maximize opportunities for the economic development and prosperity of the country and the wider region by turning it into an international energy hub



informing and training its employees about measures to prevent excessive energy consumption and encouraging them to take advantage of new opportunities to reduce energy consumption in both their work and private activities, while ensuring they are constantly informed about the effects of their activities in relation to the Environmental Management System



the use of natural resources
-environment and energy- in the
most efficient and technically feasible



supporting the country's climate
goals through environmental
protection and prevention in cases of
possible pollution from its activities



boost natural gas consumption
in the Greek energy market,
substantially contribute to the change
of the energy mix and ensure
Greece's supply sufficiency
today and in the future. In this context,
DEPA Commercial renegotiated
all natural gas supply contracts
with global energy giants, a move
that significantly strengthened
the Company's competitiveness,
ensuring, at the same time, the energy
sufficiency of the country



the development of "clean"
forms of energy that are
accessible to all and at the same
time contribute to the reduction of
Greece's environmental footprint



maintaining and strengthening a
competitive and diversified natural
gas supply portfolio. According to
the Operational plan 2020-24 the aim
is to create a "green" power portfolio
of more than 240 MW, participating in
photovoltaic or wind projects that are in
the development stage or in operation.
This represents an initiative that serves
the national goals of delignitization and
decarbonization of the energy system.
At the same time, it supports the local
economies in the areas affected by the
planned withdrawal of lignite units



the creation of a modern and
cost-effective organization,
capable of responding and adapting
to the changing needs of both the
market and society, maximizing
opportunities for growth, improving its
services, respecting society and the
environment



The year 2020 is a landmark for natural gas demand in Greece, despite the effects of the pandemic on the global energy market. The demand for natural gas reached 65 TWh, an amount greater than 2019's 57 TWh. Low natural gas prices favored the transition from lignite to natural gas in electricity generation, while further development of the natural gas distribution network and new connections boosted retail gas demand. During the first half of 2020, the oversupply of LNG in the global fuel market resulted in a sharp drop in LNG prices at international hubs (Henry Hub, TTF, NBP). On the contrary, in the second half of 2020, prices partially returned to their pre-pandemic range.

The ambition of DEPA is to evolve from a residential gas wholesaler into an integrated regional energy company, getting its value from three synergistic assets: natural gas portfolio, retail customer base and new infrastructure. More specifically, **the goals are:**



- the strengthening of its portfolio management activities in Greece and South-Eastern Europe, taking advantage of the typical portfolio flexibility natural gas and the opportunities of new EU energy target standards
- the vertical integration with the subsidiary EPA Attica, which is the Group's arm in the retail market EPA Attica, taking advantage of the opening of the energy market to become a national "dual fuel" player
- the strengthening of the role in the promotion of new uses of natural gas (SSLNG, Fisikon) and the exploitation of export opportunities through the subsidiary Gastrade, in which DEPA Commercial participates and which is developing the Alexandroupoli Gas Station which will be an LNG import gateway
- taking a leading role in the energy transition in Greece: introduction to renewable energy sources through a development "engine", building a renewable energy development platform aiming to create a wide portfolio of electricity generation projects from RES and through the use of innovative green gas (H2, biomethane)



In 2020, DEPA received from Gazprom Export (Russia) a total of approximately 1.35 billion Nm³ (15.28 TWh, in contract units), not covering the obligation to receive the minimum contractual quantity of the year. The contract quantity not received amounts to approximately 0.265 billion Nm³ (3.04 TWh, in contract units).

Accordingly, DEPA received from BOTAS (Turkey) approximately 0.46 billion Nm³ (0.51 billion cubic meters, in contract units), without covering the obligation to receive the minimum contractual quantity of the year. The contractual quantity not received amounts to approximately 0.116 billion Nm³ (0.124 billion cubic meters, in contract units). The deliveries of Azeri gas via TAP by the AGSC company started on 31.12.2020.

Also, DEPA received from Sonatrach (Algeria) six shipments of LNG, equivalent to quantities of approximately 0.25 billion Nm³, not covering the obligation to receive the minimum contractual quantity of the year. The contractual quantity not received amounts to approximately 0.04 billion Nm³ corresponding to 1 cargo.

Furthermore in 2020, DEPA received eight cargoes of LNG from the spot market, corresponding to a quantity of approximately 0.15 billion Nm³.

Gas Supply & Expenditures to natural gas suppliers

During 2020, the negotiation with Sonatrach regarding the request to renew the contract for one year was successfully completed.

More specifically, the renewal achieved foresees the following:

- a) within 2021, delivery of 10 loads during the year.
- b) reduction of the contractual price to the levels of the competition and
- c) possibility of extending the contract for another year after agreement of the parties.

GAS SUPPLY FOR DEPA 2020

Gazprom Export (Russia)	1.35 billion Nm ³
BOTAS (Turkey)	0.46 billion Nm ³
Sonatrach (Algeria)	0.25 billion Nm ³
AGSC (Azerbaijan)	3798 th. Nm ³
Spot	0.15 billion Nm ³

In 2020, DEPA continued to supply the National Natural Gas System Operator with LNG to balance the NNGTS and with gas to compensate for Operating Gas, through tender procedures. In particular, it supplied it with 104 TWh of LNG to balance the NNGTS and with approximately 81.105 TWh respectively.

Use of Infrastructure - Secondary Market

In the year 2020, DEPA Commercial transported quantities equal to 24.54 million MWh, of which 0.65 m. MWh supplied customers in Bulgaria, through the Transmission network of the Bulgarian operator BULGARTRANGAZ.

DEPA Commercial during 2020 sold through the Balancing podium of DESFA 23.710 MWh and bought 31.850 MWh.

DEPA Commercial participated in the Annual Time Slots Auctions securing a total of 10 time slots for 2021, as well as in the Related and Competitive Product Auctions for the "Gardens" and "Nea Mesimvria" Entry Points.

Except from these and based on the provisions of the ESFA Management Code, DEPA Commercial during 2020 carried out other activities related to the secondary market, such as LNG and Storage Space transactions with Third-Party Users, sales of part of LNG loads, allocations of Receiving capacity and Delivery, import of LNG loads with a Third-Party User of LNG, etc.

At the same time, DEPA Commercial, as the User of the Distribution Networks, transported quantities to approximately 75 final consumers (mostly Industrial Units, but also CNG stations and residential customers), through the Distribution Networks of DEDA, EDA Attica and EDA Thessaloniki-Thessaly.

Regulatory framework

The import, trading, transport and distribution of natural gas in Greece is regulated by Laws 2364/1995, 3428/2005 and 4001/2011, as amended and in force, in order to reflect the requirements of the European Directives and Regulations for the completion of the internal gas market, as well as ensuring transparency and integrity in wholesale market transactions. Additionally, the Union's wholesale natural gas market is regulated by the EU Regulation 1227/2011 and the EU Executive Regulation 1348/2014.

DEPA Commercial operates in full compliance with the provisions of the current legislative and regulatory framework, regarding the supply and sale of natural gas, as well as its participation in the internal EU natural gas market, under the supervision of the Energy Regulatory Authority (RAE). Within the framework of the company's strategy to further expand its activities and being transformed from a natural gas company into an energy company that will provide a combination of energy products and services, DEPA Commercial S.A. submitted in November 2020 an application to RAE to acquire an Electricity Supply License.

The Company was continuously getting information regarding the regulatory developments at European and national level, while its communication with RAE regarding the shape of the regulatory framework and the fulfillment of the obligations arising from it was more frequent.

Key Financial Figures of the Company



With a long-standing presence in the Greek market, DEPA Commercial S.A. is a dynamic company in the energy sector with a substantial contribution to the development of the Greek economy, the protection of the environment and the improvement of the quality of life of local communities. The main financial figures of the company are presented in the table below:

BASIC FIGURES OF DEPA COMMERCIAL S.A. 2020

Turnover	396,466,992 €
EBITDA*	27,409,659 €
Net Profits*	37,549,498 €
Total number of DEPA Trading Group Companies	5
Total number of Employees	168
Total number of customers served**	108
Number of company shares	1,146,321

*from ongoing operations. The Annual Financial Statements have been prepared in accordance with International Financial Reporting Standards (IFRS) and are available on the corporate website www.depa.gr.

**Includes all customer categories except those served exclusively through auctions (gas release program). The table below shows the Economic value distributed and retained.

ECONOMIC VALUE TABLE 2020

Turnover	408,368,043 €
Operating cost*	370,597,545 €
Income taxes and other taxes	9,645,481 €
Payments to capital providers	22,937,883 €
Total economic value distributed*	403,180,909 €
Economic Value Distributed %	98.7%
Economic Value Retained %	1.3%

*from continuing operations [1] To calculate the Economic Value index, the turnover includes income from dividends, as well as financial income/(expenses) [2] It concerns the dividends payable.

9

Awards



In July 2020, DEPA Commercial received the Gold Award from the Corporate Responsibility Institute (CRI), as part of the CR Index 2019-2020 awards, as the company presented an excellent performance in the implementation of Corporate Responsibility and Sustainable Development practices in 2019.

The fact that DEPA Commercial won the Gold award proves the company's commitment to offer maximum benefits to the Greek society and economy. A strategic priority for DEPA, recognizing the responsibility entailed by its role in the development of the local economy, is the further expansion into new specialized sectors, the penetration of markets with great business interest and the exploitation of opportunities in a constantly changing environment. The driving force is always Responsible Corporate Practice developments, as well as the communication with RAE for the formation of the regulatory framework and the fulfillment of the obligations arising from it.

<https://www.depa.gr/chryso-vravio-apespase-i-depa-apo-to-institouto-eterikis-efthynis/>



At the end of February 2020, the global community experienced unprecedented situations following the outbreak of the Covid-19 pandemic, which developed into a matter of utmost importance for public health and the economy on a global scale.

From the first moment, DEPA Commercial meticulously followed the instructions of the authorities, EODY, the World Health Organization and the Occupational Doctors. In this context, it proceeded with a series of actions with the aim of ensuring the protection of its employees, maintaining the operation of all its activities and supplying the market. At the same time, it took initiatives to support the National Health System, showing in practice its solidarity with society as a whole in these difficult conditions. In this direction, the Company took the following actions:

Actions for the employees:



Adoption of a timely and successful new model of remote work (teleworking), and where possible with shifts.



Regular disinfection in all workplaces.



Availability of personal protective equipment (PPE) for prevention.



Preparation of a Plan to Manage Suspicious Coronavirus Cases to ensure the uninterrupted operation of the Company



Carrying out frequent laboratory tests for COVID on employees and external partners



Remote IT systems support
Change of shifts

Initiatives to strengthen the National Health System:

The Company helped in the improvement of the hospital equipment of the following Health Centers and Hospitals:

Health Center of Areopolis

Hospital "Agios Savvas"

The ICU of the GUH of Ioannina for COVID-19 patients



The Group is exposed to various financial risks, the main of which is market risk, which includes the exchange rate risk, the interest rate risk and price risk, credit risk, liquidity risk and capital risk. The Group's related risk management policies aim to minimize the negative effects these risks may have on the Group's financial position and performance.

Macroeconomic Environment: During 2020, the crisis due to Covid-19 disrupted global financial stability and overturned the growth prospects of the Greek economy for 2020, which were positive during the first two months of the year. GDP increased by 2.3% in the third quarter of 2020 compared to the previous quarter (the decrease compared to the corresponding period of 2019 was 11.7%) mainly due to the implementation of the measures to deal with Covid – 19, the Greek Government was forced to impose. The increase of GDP in the third quarter was mainly driven by an increase in private consumption and imports, offset by a decline in exports and investment.

The Covid-19 pandemic is expected to have a negative impact on the Greek and global economy, as it will affect public debt, the unemployment rate, and non-performing loans and investments. The quarantine imposed by the Greek Government also had a significant impact on demand and private consumption. Management is constantly evaluating the situation and possible future developments in order to ensure that all necessary measures are taken to minimize any impact on its operations.

COVID-19: On March 11, 2020, the World Health Organization declared the COVID-19 virus a pandemic, given its rapid spread throughout the world. Many governments around the world have already taken strict measures to help contain and delay the spread of the virus, which has slowed down economies worldwide, causing significant disruption to business and daily life. Many countries, including Greece, have adopted extraordinary and economically damaging measures, including requiring companies to reduce or even suspend normal business activities. Governments have also imposed travel restrictions, as well as

strict quarantine measures. Sectors, such as tourism, hospitality and entertainment, are expected to be directly and significantly affected by these measures. Other sectors, such as manufacturing and financial services, are expected to be indirectly affected. The easing of restrictive measures since the beginning of May led to a gradual recovery of economic activity and domestic demand. However, after the steady increase in the number of cases reported during August, the Greek government announced additional measures to limit the spread of Covid-19.

The measures mainly affect traveling from certain countries, the opening hours of restaurants in different parts of the country, as well as limiting the number of people who can participate in public gatherings. Despite the measures taken in the previous months, the situation in the country worsened with a significant increase in cases and the new strain of the virus, and the government announced even stricter measures, including local quarantines, in order to control the spread of the pandemic and ensure public health.

The financial impact of the current crisis on the global economy and all business activities cannot be estimated with reasonable certainty at this stage due to the rate at which the outbreak is expanding and the high level of uncertainty arising from the inability to predict the final outcome. All that is beyond the control of the Group, however, Top Management constantly assesses the situation and possible consequences, in order to ensure that the necessary actions will be taken to minimize the impact on the Group's activities. Due to the pandemic and reduced demand, the conditions in the international energy markets worsened in the 1st half of 2020 and prices fell to extremely low levels. The gas market in Greece did not face any problem. The Company and the Group kept supplying their customers without any problems.

As previously mentioned, the main financial instruments of the Group are cash, bank deposits, trade and other receivables and liabilities and bank loans. The Group's Top Management examines and revises at regular intervals the relevant policies and procedures regarding the management of financial risks, which are described below:



INTEREST RATE RISK:

The Management monitors, on a continuous basis, the interest rate fluctuations and the financing needs of the Group.

EXCHANGE RATE RISK:

The Group faces an exchange rate risk from the change in the exchange rate of the dollar, mainly with regard to natural gas supply transactions, which are carried out on the basis of contracts with foreign suppliers and mainly expressed in US dollars. On 31/12/2020, if, ceteris paribus, the exchange rate of Euro against the US dollar had been strengthened by 10%, the pre-tax results of the parent company and the Group would have increased by 10,135 thousand Euro and correspondingly the after-tax results of the parent company and the Group of the closing year would have been increased by the amount of 7,703 thousand Euro, as would result from the valuation of purchases and liabilities to suppliers that are expressed mainly in US dollars. Moreover, if, ceteris paribus, the exchange rate of Euro against the US dollar had decreased by 10%, the pre-tax results of the parent company and the Group would appear reduced by 12,387 thousand Euro and correspondingly the after-tax results of the parent company and the Group of the closing year would appear reduced by the amount of 9,414 thousand Euro, as would result from the valuation of purchases and liabilities to suppliers that are expressed mainly in US dollars.

PRICE RISK:

The Group faces risk from changes in the prices of competing natural gas products as its costs are affected by fluctuations in the price of oil and its sales prices are partially regulated in relation to competing fuels. The Group formulates its pricing policy based on the supply price of natural gas.

2 Credit risk



Credit risk arises from cash, derivative financial instruments and bank deposits, as well as credit exposures to the Group's wholesale and retail customers. Customer credit is in accordance with the credit policy of the Company and the Group, while in case of exceeding payment deadlines, interest is charged to the customers. The Company is concentrated on sales, as approximately 55.44% of its total sales are made to the PPC S.A., 11.47% to Elpedison Energy S.A., and 5.63% to EPA ATTICA S.A. The Management constantly monitors the financial situation of its customers, the size and limits of the credits provided. According to the Management, at the end of the year the credit risk is covered by the collateral and the provisions deemed necessary at that moment, in conjunction with the actions taken by the Company to provide guarantees and a repayment schedule from overdue customers. The greatest credit risk in the event that the counterparties do not meet their obligations regarding each category of recognized financial asset, is the current value of the claims in question as they appear in the Balance Sheet reduced by the value of guarantees and pledges.

3 Liquidity Risk

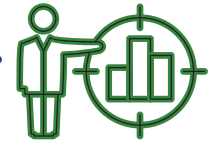


Liquidity risk is managed through the availability of sufficient cash reserves and credit lines with partner banks. The existing available unused approved bank credits to the Group are sufficient to meet any potential cash shortfall. The following table shows an analysis of financial obligations and liabilities from derivative financial instruments, according to their contractual settlement dates.

4 Capital risk management



The purpose of the Group in the management of its funds is to ensure the ability of continuous activity, to provide profits to its shareholders and benefits to other stakeholders, as well as to maintain a capital structure, which will reduce capital costs. The fund is reviewed based on a leverage factor. The ratio is calculated as net debt divided by total capital. Net debt is calculated as total liabilities minus cash. Total capital is calculated as the equity shown on the Balance Sheet.



The process of identifying important issues is the way to identify, comprehend and prioritize the issues related to Sustainable Development. Through this process, which is a fundamental process according to GRI standards, the company is able to prioritize all important non-financial issues. At the same time, this specific process enables the Company to improve its strategy, goals and social and environmental initiatives, aiming to operate responsibly in the entire scope of its activity, supporting sustainable development and sustainability.

The results obtained through this dynamic process of Materiality also determine the basic content of the annual Sustainable Development Report, including the topics that are considered important and have been recognized as reflecting the social, economic and environmental impact of the Company. Moreover, consultation with the groups of Social Partners, which is an integral part of the Corporate Social Responsibility policy of DEPA, improves the understanding of the effects of the company's activities, simultaneously enriching with new data the process of defining all important issues.

METHODOLOGY



STEP 1

Identify and prioritize key stakeholders to be included in the process.



STEP 2

Identification and prioritization of key Corporate Responsibility indicators using the GRI guidelines.



STEP 3

Materiality research to determine the issues according to the opinion of stakeholders and Management.



STEP 4

Create a matrix table (chart) that identifies the essential topics.

With the completion of the process of collecting opinions from the company's interested parties as well as from the Management's side, the following are characterized as essential issues:

ENERGY CONSUMPTION AND MANAGEMENT		GREENHOUSE GAS EMISSIONS	
ENVIRONMENTAL IMPACT	WATER MANAGEMENT		
WASTE MANAGEMENT	EMPLOYMENT	EMPLOYEE TRAINING	
EMPLOYEE HEALTH AND SAFETY			
COMMUNITY RELATIONS	LEGAL COMPLIANCE		



Stakeholders are all those directly or indirectly influencing the operation and functionality of DEPA Commercial, as well as those who are affected by its business activities.

Our Stakeholders are evaluated and redefined at regular intervals based on the Company's values, strategy and operating framework, as well as the wider political, economic and business environment. Two-way communication with Stakeholders is a process with an impact on the operation, strategy formation and decision-making of the Company, while at the same time it is the foundation of the relationships of trust between the involved parties. Stakeholder groups are: Employees, Customers, Shareholders, Suppliers, Regulatory Authorities, Affiliated Companies, DEPA Business Partners (or potential Partners), Government, Media and Local Society.



INTERESTED PARTIES FOR DEPA COMMERCIAL	FORMS OF DIALOGUE	FREQUENCY OF COMMUNICATION
Employees/ DEPA Employees Union	Intracompany networks (Intranet, HR	Any matter that needs to be settled
Clients Power generation Industry Commercial customers, Household consumers	Team meetings, or teleconferences, annual consultations website, social media, newsletter	On a regular basis, according to the needs
Shareholders	Target meetings, annual general assembly	On a regular basis, according to the needs and size of the project
Suppliers	Written communication (e-mail), telephone communication, interpersonal communication with implementation of meetings	Daily, according to the needs of the projects
Regulatory Authorities RAE	Annual meeting	On a regular basis, according to the needs and size of the project
Subsidiaries and Business Partners	Meetings, electronic communication via email, teleconferences, correspondence	On a daily and regular basis
Government Ministers	Telephone and written commu- nication (email, fax, letters, etc.)	On a regular basis and when necessary
Media	Telephone and written communication - Publication of Press Releases	On a daily basis
Local Society	Telephone and written communication (email, fax, letters, etc.)	
Social Bodies	Telephone and written communication (email, fax, letters, etc.), website, social media platforms, newsletters	On a regular basis and when necessary

Environment



Environment

DEPA's non-negotiable commitment is to minimize the consequences on the environment, natural resources, the atmosphere and the quality of life of the residents, wherever it operates.



The protection of the natural environment is for DEPA Commercial a concept interconnected with sustainable development. The Company's non-negotiable commitment is to minimize the consequences on the environment, natural resources, the atmosphere and the quality of life of the residents, wherever it operates. In this context, both during construction and during the operation of its facilities, DEPA applies the strictest environmental standards provided by Greek and European legislation, while DEPA's natural gas system facilities have been built in accordance with international environmental standards and have been certified by specialized organizations.

Also, the Company actively participates in research and development initiatives always aiming to protect and upgrade the environment, while in the context of Corporate Social Responsibility programs it participates in various initiatives and programs, aimed at raising awareness on environmental issues.

Part of the Company's environmental practices is the systematic counting of energy, and water consumption, as well as greenhouse gas emissions in all its facilities. Also, an extensive program of recycling materials and devices is followed. As the Company has linked Responsible Corporate Behavior with sustainable business success, it requires the commitment and active participation of all its employees in the relevant actions.

The practical interest of all employees, as well as their voluntary participation in the Company's actions, is not only compliance with the rules and codes of DEPA, but also an obligation towards society and future generations.



Greenhouse Gas Emissions

DEPA is a role model company that harmonizes with the conditions and requirements of the time in the field of environmental protection. As part of its activities, the Company submitted a report on the intensity of greenhouse gas emissions (GHG), based on L. 4062/2012 and Directive (EU) 2015/652, regarding the quantities of fuel it channels into the domestic market for the movement of road vehicles. In the calendar year 2020, DEPA cleared and transported 15,376,689.2 kg of CNG with a net emissions intensity of 69.3g CO₂eq/MJ, which corresponds to a reduction of 26.4% compared to the average price of the year 2010 for use in road transport within the Greek Territory. The results were verified through a verification body - duly accredited by the Hellenic Accreditation System, according to ISO 14065:2013 - where no non-compliances were recorded. In addition, DEPA is in the stage of developing new technologies in an effort to replace sources of pollution (e.g. power plants), which will

Energy

Measurement results 2020

Proper energy management is a priority for DEPA Commercial as the resulting benefits are profitable for all sectors of the Company's activity.

More specifically, the Company's vehicles consumed a total of 296.7 MWh in 2020 compared to 426.4 MWh in 2019, which means that energy was reduced by 30%. The main reason is the pandemic and, by extension, the restriction of movement. At the same time, the index of energy consumption per vehicle and year decreased by 14% in 2020 compared to 2019 (from 13.95 MWh to 12 MWh). Furthermore, the index of energy consumption in MWh/100km decreased from 0.077 MWh/100km in 2019 to 0.073 MWh/100km in 2020, which represents a reduction of around 5%. This result is due to environmentally friendly driving and at the same time to the replacement of gasoline with natural gas.

Moreover, for the year in question, it was found that the energy consumption resulting from the use of fuel in company cars merely represents 9.75% of DEPA's total consumption and is clearly lower than in previous years. The total energy consumption of the Company, including the building facilities, the vehicles, as well as the Bus Filling Stations (SALFA), was estimated at 3,043 MWh in 2020, while for the previous year 2019 it was 3,200 MWh, which is a decrease of 5%. The largest percentage of energy consumption (electricity) comes from the two SALFA stations, where for the year 2020 a consumption

equal to 2,249 MWh was recorded, i.e. slightly reduced compared to the corresponding consumption in 2019, which was 2,298 MWh. No significant reduction in consumption was observed, which fluctuated at the same levels, as it was adversely affected by the reduction in the production of Natural Gas (through the operation of the compressors). It is noted that the production profile has a negative effect on the consumption index. It is important to highlight the fact that in specific building facilities, such as the administration building, there was a slight increase of about 4%, from 476 MWh in 2019 to 497 MWh in 2020, or respectively from 151.55 KWh/m² to 158.19KWh/m². This means that zero progress is observed and this is due to the non-implementation of additional savings measures this year, which have nevertheless been postponed to 2021. Nevertheless, the consumption was kept below the good practice limit of 234 KWh/m². It is worth mentioning that the electricity consumption in the office building corresponds to 16.33% of the Company's total consumption.

Innovations in the energy sector



DEPA Commercial is a modern and competitive company, with integrated planning and targeted investments, with a dynamic presence in the energy sector and a substantial contribution to the development of the Greek economy, the protection of the environment and the improvement of the quality of life of local communities. At the same time, offering more and more citizens energy that is both affordable and efficient, it brings natural gas to the most remote areas of Greece, adopting smart technologies (such as CNG and LNG) and contributing to the reduction of energy poverty. Another important project is the development of an integrated supply chain for the distribution and trading of natural gas in Cyprus, which puts an end to the island's energy isolation, with the implementation of the CYNERGY program. The Company is also leading the way in the new Floating LNG Terminal (FSRU) planned in Alexandroupoli, one of the largest energy projects implemented in our country in recent decades.



Certifications

DEPA has all the necessary certifications, rendering it an environmentally friendly company. In particular, it has a certificate and implements an Energy Management System according to the ISO 50001:2018 standard, aiming to achieve the most effective and efficient use of energy required for the implementation of its activities. Also, the Company highlights the advantages of using natural gas over other competing fossil fuels, e.g. Environmentally friendly. Furthermore, the Company implements an Environmental Management System according to ISO 14001:2015 and holds a certification for the two fueling stations for vehicles with compressed natural gas. The goal is for the Company operation to respect the Environment, preventing and substantially reducing its environmental footprint.



ISO 50001:2018
for applying
the Energy
Management
System



ISO 14001
for the
Environmental
Management
System



ISO 14065:2013
to measure
Greenhouse Gas
Pollutants



Compliance with regulatory framework in energy matters

In the context of compliance with the regulatory framework, DEPA Commercial submitted in November 2020 an application to RAE to acquire an Electricity Supply License that serves its strategy to expand its activities and transform it from a natural gas company into an energy company, which will now provide a combination of energy products and services. Also, the European and global energy market is monitored in relation to the planning of new actions for the climate and the implementation of activities that contribute to the achievement of climate neutrality by 2050. Furthermore, the Company participates in groups of international energy operators in order to directly evaluate the effects of the European regulatory framework under development on the commercial operation of gas companies, while promoting the Company's strategic interests. In addition, the Company harmonized its obligations with the Energy Performance Obligation Regime according to L. 4342/2015 presenting an energy saving equal to 1.001 ktoe, which is much greater than the mandatory minimum annual target and at the same time, it met the obligation to submit a report on the intensity of greenhouse gas emissions of L. 4062/2012.

DEPA Commercial implements an Energy Management System (EMS)

- 1 the recording of energy flows and a Management plan so that, potentially, every form of energy is used in the most suitable way.
- 2 reduction of consumed energy and at the same time increase of efficiency during its operation.
- 3 understanding the energy issues within it.
- 4 the existence of a structured energy management system aimed at training employees
- 5 the reduction of greenhouse gas emissions and in general of its carbon footprint.

The documentation of the energy planning and programming process is completed through the "Goals, Targets, Indicators and Actions Process". This process determines, among other things, the methodology for establishing and updating Energy Performance Indicators. Indicators must reflect energy use and consumption so that they are comparable measurable quantities. They are updated and approved by Senior Management.

Investment in "clean" forms of energy

The Business Plan of DEPA Commercial includes the implementation of corporate development projects aimed at investing in "cleaner" forms of energy, such as: **(a)** Small Scale Liquefied Natural Gas (SSLNG) Projects, **(b)** Renewable Energy Sources (RES) Projects, **(c)** Hydrogen and Biomethane Projects (H2BM) and **(d)** Energy Efficiency and Electrification Projects. In addition to the purpose of coordinated monitoring of the implementation of these Projects, DEPA has created the Inter-Enterprise Project Management Office (PMO) as well as the appropriate organizational structure for each Project (Project Team) which has been joined by highly qualified and experienced executives.



(a) Small-Scale LNG Project

The Company systematically invests in the development of small-scale liquefied natural gas (LNG) applications, focusing on its use as ship fuel, to meet the needs of customers outside the pipeline network and for road transport. Over the past year, the company's business plan for small-scale LNG (SSLNG) infrastructure and supply chain development was updated, while potential strategic partnerships explored.

1) LNG as ship fuel

DEPA is the coordinator of the European POSEIDON MED II and Blue Hubs programs, while also participating in the SuperGreen program, contributing significantly to the development of an integrated LNG supply chain for Shipping and the ports of the Eastern Mediterranean. In this context, it is proceeding with the construction of a new innovative LNG supply ship for maritime use in Greece, based in Piraeus to carry out LNG ship-to-ship loading as well as the supply of two LNG tankers to supply smaller ships that will consume LNG. The initiative will provide the shipping industry in the Mediterranean with an environmentally friendly and at the same time competitive fuel, as required by the latest EU and International Maritime Organization (IMO) directives. In January 2020, a contract was signed with the European Investment Bank (EIB) to finance the construction of the vessel in question. For the selection of the shipyard for the construction of the ship, there is an international tender in progress. It is estimated that the ship will be ready for commercial operation in 2023. Likewise, a tender is underway for the supply of the two LNG tankers. The supply ship will be supplied from the ship loading station in Revythoussa, which is under design and construction by DESFA. At the same time, the competent Protect Team shapes the commercial policy, conducts market research, and explores the possibility of concluding new commercial agreements, to enable the start of commercial activity as soon as the Revythoussa ship loading station is operational.

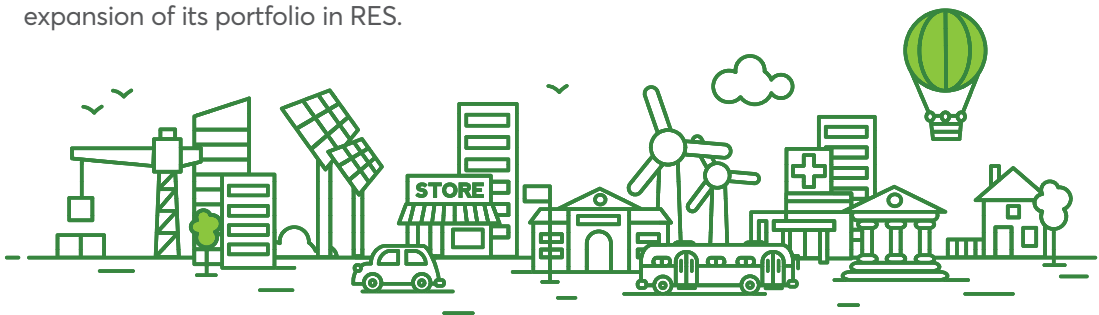
2) LNG for off-grid customers and for road transport

LNG, as the cleanest fossil fuel with high energy content, replaces the most polluting petroleum fuels by enabling cleaner energy production and reducing emissions in the supply chain, while also being a more cost-effective energy source for end users. Along with the growing need for cleaner and affordable fuels, the road transport sector is acquiring more and more natural gas vehicles. To supply the natural gas heavy vehicle market, the Company is proceeding with the installation of LNG fueling

stations. The transportation of LNG for the said uses will be done by tankers and the LNG supply point will be the truck loading station in Revythoussa which is under construction by DESFA. Future supply points could be in Patras, Igoumenitsa and Heraklion in synergy with the facilities planned under the Poseidon Med II project. At the same time, the Project Team has developed a commercial policy and is proceeding with the conclusion of commercial agreements to facilitate the launch of commercial activity as soon as the tanker loading station in Revythoussa is operational.

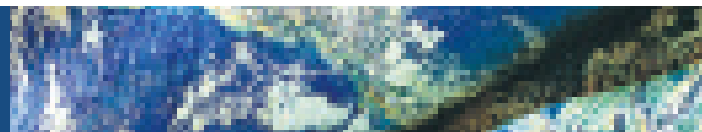
(b) Renewable Energy Sources Project

According to the Business Plan 2020-24, the aim is to create a "green" power portfolio of more than 240 MW, through the participation of DEPA Commercial in photovoltaic or wind projects that are in the development stage or in operation. The Company contemplates the further expansion of its portfolio in RES.



(c) Hydrogen and Biomethane Project

The Company is also investing in promising alternative energy sources, such as hydrogen and biomethane. DEPA Commercial is a founding member of the European Clean Hydrogen Alliance aiming to attract investments in hydrogen technologies and fuel cells, while taking initiatives to create the first hydrogen refueling station in our country. The Company also deploys independent projects on alternative and cleaner fuels, exploiting its longstanding experience in the NG market. These projects will target customers operating in the road transport, power generation and industrial sectors. In order for DEPA Commercial to become more familiar with the respective technologies and have all the required data for their evaluation and expansion on a large scale, corresponding cases for hydrogen and biomethane are planned and piloted. More specifically, in the field of Hydrogen, DEPA Commercial was particularly active in 2020.



Πιο συγκεκριμένα:

1

The Company was particularly active in the EUROPEAN CLEAN HYDROGEN ALLIANCE, introduced by the European Commission of July 8, 2020, with the participation of important industry factors, citizen's society, and the European Investment Bank. The Alliance aims to create the proper framework, to channel and facilitate investments in the sectors of hydrogen and fuel cell technologies. The CEO of DEPA Commercial participates in the Alliance as one of the 18 Co-Chairs and as the sole representative of a Greek company.

2

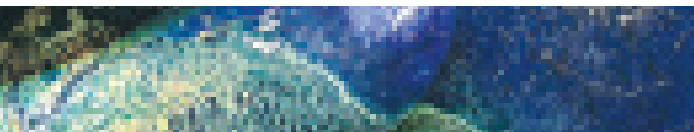
DEPA Commercial is also a member of the European Hydrogen Association (HYDROGEN EUROPE), participating in all important working groups and closely following developments in the hydrogen sector. The association is based in Brussels and represents more than 200 bodies (industrial companies, research organizations and National Associations) active in the field of hydrogen and fuel cells.

3

In the context of the intensifying initiatives of the EU to promote the use of hydrogen, as well as the planned lignitization in Western Macedonia, DEPA Commercial has assumed a coordinating role in the IPCEI (Important Project of Common European Interest) "White Dragon" project under construction, in partnership with other large energy companies and in close cooperation with the competent bodies of the EU and the Region of Western Macedonia. A relevant proposal for funding as an IPCEI project has already been submitted within 2021, in the national and community evaluation and selection process, and the project already has many chances to be selected as a "fast track" project, securing multilateral funding (IPCEI, Just Transition Fund, EIB).

(d) Energy Efficiency & Electrification Project

The specific project is currently being developed, in terms of energy efficiency systems for domestic consumers and in the field of electric mobility, by DEPA's subsidiary company, ATTICA GAS SUPPLY COMPANY - HELLENIC SINGLE MEMBER ENERGY SOCIETE ANONYME (distinctive title "NATURAL GAS - HELLENIC ENERGY COMPANY"). The Company explores potential synergies, and to further expand the implementation of energy efficiency systems in bigger and more energy-consuming consumers.



Energy Security and Clean Energy Transition

The new National Energy and Climate Plan, which accelerates delignitization, as well as the objective of a climate-neutral Europe by 2050, set by the European Green Deal, form a strategy that aims, first, to accelerate the transition to clean energy and secondly, in the diversification of sources and routes of supply. In this newly shaped landscape, the importance of natural gas is upgraded, as it becomes the bridge between conventional and renewable energy sources.

DEPA Commercial, which laid the foundations for the import and supply of natural gas in Greece with investments amounting to 3.2 billion Euro, today is the company that guarantees the energy security of the country, thanks to the long-term contracts it has concluded with leading international suppliers. At the same time, it is constantly expanding the use of natural gas - an environmentally friendly fuel - throughout the country.



2

Protection of natural environment and biodiversity

DEPA Commercial has as its main priority the restoration - repair and upgrading of the natural environment and biodiversity.

The basic stages, which are of utmost importance for the Company in terms of prevention and protection of the biodiversity of the ecosystem, are: a) project construction b) the operation of natural gas facilities. With reference to the above, the Company is committed to complying with the environmental legislation and undertake initiatives, through research and development studies, in order to identify those cases that require remedial measures to protect and upgrade the natural environment. At the same time, through the implementation of the AMS and the "Procedure for the Identification of Non-Compliances and Management of Corrective and Preventive Actions", DEPA Commercial has established the way of managing deviations from the statutory procedures, the criteria, as well as the energy goals and objectives.

Non-compliances are divided into:

CRITICAL NON-COMPLIANCES
(SIMPLY REPORTED AS
NON-COMPLIANCES)

OBSERVATIONS

THIS PROCEDURE INCLUDES:

the identification and recording of non-compliances

their prioritization and evaluation

the imposition of restitution (or simple correction)

examining the causes of more serious or recurrent cases



the need to impose corrective actions to eliminate the cause of an existing non-conformity (or the need to take action to prevent future non-compliances)

the implementation of initiatives and the evaluation of their effectiveness

Moreover, the staff, through training, information from the Company's internal information channels (e.g. intranet, bulletin boards, etc.), work supervision, evaluation of proposals for improvement and participation in consultation, is activated, and gains awareness of environmental issues. Through the internal information channels, the staff is trained on important environmental aspects and impact (actual and potential) related to their work, any adverse effect of various situations created by them or by other factors during the exercise of their duties, as presented in the WORA for Bus Natural Gas Fueling Stations and the Administration Buildings, as well as on the consequences of non-compliance with the requirements of the System, including compliance obligations.

In any case, personnel who may, due to the nature of the work, cause a significant impact on the environment, or endanger themselves or their colleagues, are properly trained to offer their services ensuring that all measures aiming to minimize or eliminate negative impacts are taken. In addition to the staff, the contractors who work in the facilities of DEPA Commercial can also cause significant environmental impacts. For this reason, the Company informs the personnel of the contractors and takes all those measures that will prevent a possible incident.



DEPA Commercial contributes decisively to the promotion of "green solutions", promoting natural gas as a fuel source, which is more environmentally friendly than lignite (38%), fuel oil (28%) and diesel oil (24%) (the percentages are higher if one takes into account the higher degree of efficiency of LPG compared to other fuels). Therefore, natural gas is a key factor for the substantial development of renewable energy sources and new important fields of use (automobility, innovative forms of energy such as hydrogen and liquid fuels). At the same time, natural gas is a key tool for promoting the European objective "20-20-20" and by extension the EU Energy Policy.

DEPA Commercial is a strong regional energy company that provides innovative and quality services and aims to achieve transition to green energy forms on technically feasible, economically viable and commercially competitive terms. The ultimate goal is to create a modern and cost-effective organization, which will respond and adapt successfully to the changing needs of the market and society and will take advantage of future development opportunities by constantly improving its services, with respect for people, society and the environment.

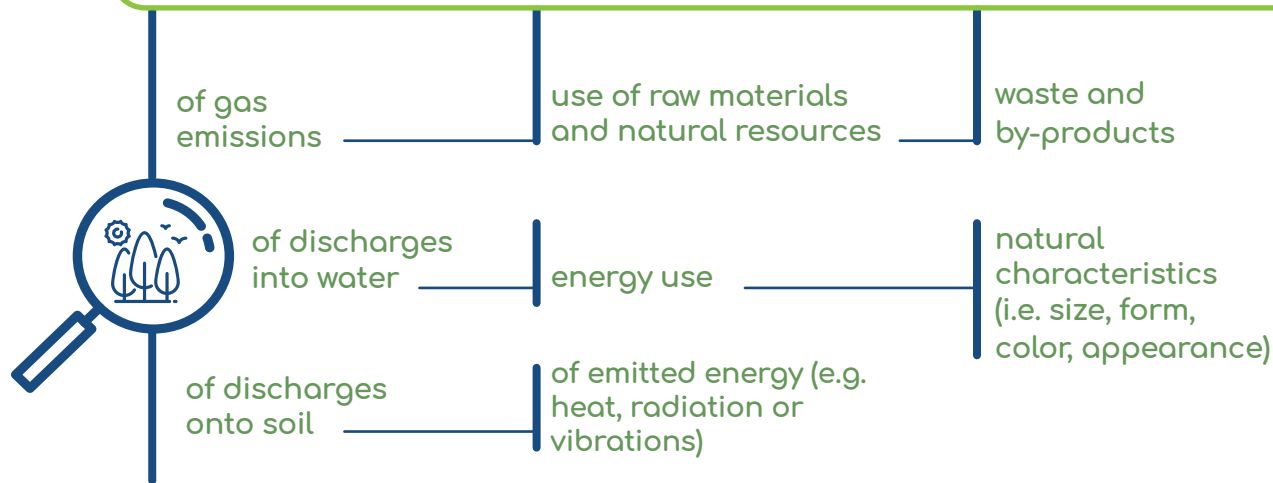
Activities

At the same time, the Company supports with its activities, mainly in natural gas, the commitments of the country to adopt measures regarding the achievement of the objectives of dealing with climate change, adjusting its strategy accordingly. Indicatively:

1. Active participation in numerous public consultations at national level (RAE, DESFA, Ministry of Energy).
2. Communication and consultations with RAE on many issues that arise from the current legislative and regulatory framework and have an impact on its smooth operation.
3. Monitoring the European and global energy market with regard to the planning of new initiatives on the climate, and the implementation of activities that contribute to the achievement of climate neutrality by 2050.
4. Participation in groups of international energy stakeholders, such as EFET (Gas Committee, Hub Development Group & Task Force Central South-Eastern Europe) and Eurogas (Steering Committee, Wholesale Market Committee, Gas Advocacy Group), in order to directly assess the effects of the formation of a European regulatory framework in the commercial operation of the Gas Companies and promote the strategic interests of the Company. Moreover, within the framework of this participation, the company has an active role in the development of the gas trading hub in the Greek market (which is also being promoted by the State, to boost market liquidity).
5. Regular submission of data to RAE, for gas import prices and commercial activity, in accordance with the special conditions of the gas supply license, as well as to ELSTAT regarding gas sales and supply price indices.



In the context of the "Environmental Management System Design" procedures, the requirements are the recognition of the environmental aspects of the Company's activities, the evaluation of their effect, their prioritization and measure implementation. The environmental aspects of the Company are identified through:



Moreover, identifying the environmental aspects may result directly from the Company's activities or indirectly from the providers, use or management of the products. For the indirect aspects and according to the Life Cycle Analysis (LCA), the Company does not have absolute control, but can only influence them since they concern processes upstream or downstream of DEPA's processes.

In general, the Company, in order to ensure its corporate reputation as environmentally friendly, annually carries out internal training (by specialized Company personnel or partners), as well as external training (at recognized educational institutions), while at the same time it has established a system of monitoring and measuring parameters with significant impacts on Health & Safety, work and the Environment.

These measurements constitute the System's performance and inter alia concern:

- o indicators set to monitor objectives and programs
- o consumption of environmental parameters (i.e. NG, creation of waste, energy consumption, natural resources consumption, etc.)
- o measurements of harmful factors (physical, chemical, biological) for health and safety at work
- o monitoring of events, Safety/Health inspections, emergencies and non-compliances
- o other parameters related to the effectiveness of the System

The System's performance measurement indicators are determined on an annual basis as a result of policy and important environmental aspects and risks. Measurements/ monitoring of environmental aspects have been determined through the "Environmental and Health & Safety Operation Inspection Process".

Employee movement report

The Company gave its employees OASA Unlimited Travel Cards, as part of the information on the reduction of the carbon footprint from daily activities. In 2020, 33% of employees used the Unlimited Travel Card for their daily commute to and from work.

Inspection and evaluation

In order to ensure the rational environmental policy of the Company, internal and external inspections are constantly carried out. The aim is to comply with the requirements of ISO 50001 & ISO 14001 for which the company has certificates. Furthermore, the purpose of the inspections is to comply with the requirements of the Energy Management Systems, as well as with the legislation and regulations.

With regard to the environmental issues that arise, DEPA Commercial undertakes to:



informs and trains its staff on measures to prevent and limit energy consumption, while encouraging the use of new opportunities to reduce energy consumption both during the exercise of their work duties and in private activities



thoroughly investigates ways of reducing energy consumption, the use of conventional fossil fuels and increasing the use of natural gas, as well as renewable or alternative energy sources. In fact, in order to implement the above, the Company has adopted the international standard for energy management ISO 50001:2018



protects the environment and prevents the generation of pollution from its activities



complies with all the relevant legal and other obligations, regarding environmental protection



determines objectives, as well as **improvement programs** which it systematically reviews in pursuit of: the continuous and further improvement of the Company's performance in environmental matters



uses natural resources (mainly NG and Electricity) in the most effective and technically feasible way



cooperates with national and local bodies that are responsible for the protection of the environment



ensures the continuous information of its staff, regarding the effects of their activities in relation to the Environmental Management and Energy Management System of Health & Safety at work, as well as their awareness of Environmental protection issues



Undeniably, the climate crisis has dramatically exacerbated the problems of insufficient water resources on the planet. DEPA Commercial recognizes the need to safeguard water as a natural resource precious to life itself. The Company widely applies practices that ensure its rational use, and at the same time making every possible effort to reduce water consumption in its facilities and offices. The total water consumption comes from the EYDAP water supply network and concerns the sanitary areas, the kitchens, the cleaning of the premises and the garden of the Company's facilities.

Water Consumption:



3,112m³

2020

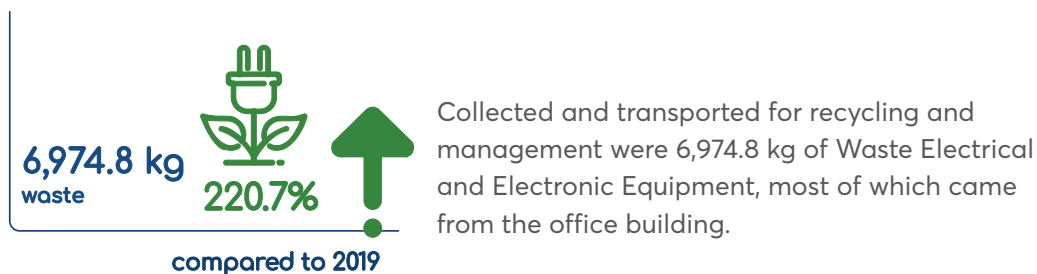
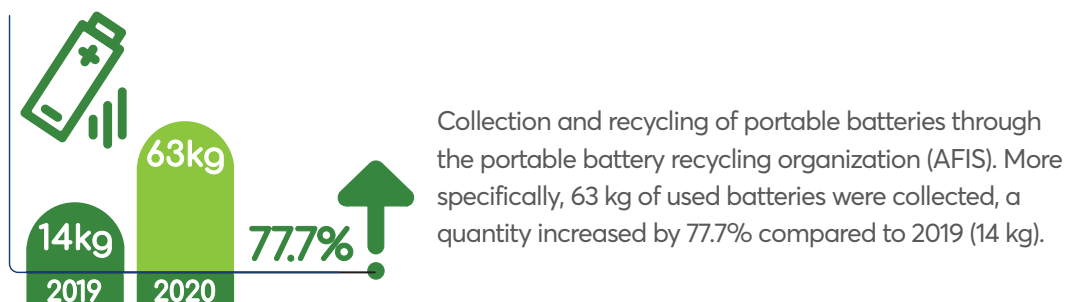
In the year 2020, the Company's water consumption amounted to 3,112 m³. Compared to the water consumption of 2019, there is a slight

increase. More specifically, in 2019 water consumption was recorded at 2,929 m³, while in 2020 the corresponding measurements showed that 3,112 m³ were consumed in the production units, which means an increase of 6.25%.



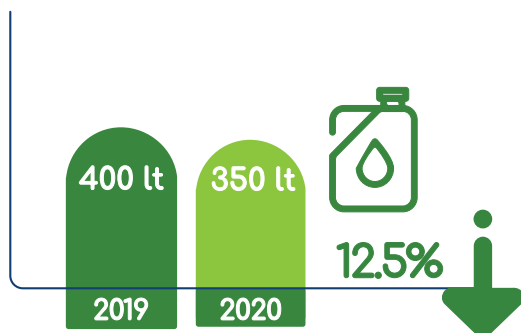
The collection, proper management and reduction of waste are a top priority for the Company. In order to ensure the rational operation of the Environmental Management System in terms of waste, DEPA prioritizes prevention, reuse and recycling to address potential problems that may arise through the production of waste.

For example, in 2020 DEPA proceeded with the management and disposal of the following waste, as an integral part of its good environmental practice:



18m³  liquid waste

Management of 18 m³ of liquid waste from the Bus Fueling Station of Anthoussa, through a licensed partner company.



With reference to the production of Waste Lubricating Oils from the petrol stations, in 2020 the produced quantities were 350 lt, i.e. reduced by 12.5%, compared to 400 lt in 2019.

EU - Taxonomy

In 2019, the European Union adopted the European Green Deal and established an ambitious and innovative development policy, which set as its primary objectives the reduction of greenhouse gas emissions by at least 55% by 2030, compared to the levels of 1990 and zero net greenhouse gas emissions in the year 2050.

A necessary condition for achieving these ambitious goals is sustainable activities and investments. To this end, Regulation (EU) 2020/852 established a classification system for sustainable activities. The taxonomy Regulation sets six environmental objectives and expects companies to contribute significantly to the achievement of one or more of the environmental objectives without significantly burdening any of the other five.

DEPA Commercial, supporting in a continuous and non-negotiable manner, the efforts of our country and the European Union to achieve the objectives of the European Green Deal for the climate, the transition to viable and sustainable development and an environmentally and socially sustainable economy, has set as its priority the development of environmentally and socially sustainable activities. At the same time, it aims to proceed to sustainable and green investments, which will be in line with the provisions of the Regulations on taxonomy and shall contribute to sustainable development at a European and National level.

Society

● Society

The establishment of a stable, healthy and safe working environment and the maintenance of a good working climate, which will promote the work of the Company by releasing the productive power of the employees, is our obligation.



Some of the main parameters helping in the creation and preservation of a good working environment are the following:

Respect for colleagues and third parties - Respect for Diversity - Respect for Human Rights

The executives, employees and partners of DEPA must behave with respect to their colleagues and to everyone dealing with the Company. Also, they must comply with the current legislation on providing equal opportunities. Sexual or other forms of harassment of any employee or third party dealing with the Company is not acceptable at DEPA. If any employee or partner think they have become a victim of sexual or other harassment (racial, religious, etc.), they must submit a written complaint to the Director of Human Resources Activities and/or to the Corporate Ethics Committee, who will handle the matter confidentially, objectively and sensitivity for all involved. It should be noted that during 2020 there were no discrimination issues in the Company.

Equal opportunities for all

The Company provides equal opportunities to all its employees and partners, both regarding recruitment criteria, as well as for rank promotions and the filling of vacant organizational positions. The value, qualifications and performance of individuals are the criteria on the basis of which the more complex and demanding roles of the organizational chart are assigned. Characteristics related to the sex, religion, age, origin and color, or beliefs of the candidates are not grounds for preferring them or excluding them over their fellow candidates.

Health & Safety

All employees and associates of the Company must observe and apply health and safety rules in daily work activities, contribute to the prevention of accidents, participate in safety and hygiene programs organized by the competent services and immediately report to the competent authorities for Health and Safety, any situations that may cause accidents.





DEPA Commercial recognizes that its staff is the driving force of the Company. Therefore, they constitute a decisive factor in its sustainability and development. With the aim of ensuring decent employment conditions and the well-being of its employees, the Company provides proper guidance, demonstrates respect for human and labor rights and invests in the continuous training of its employees. Thus, it creates a healthy working environment that respects and listens to the needs and peculiarities of each employee.

Regarding working conditions, DEPA provides an environment of equal opportunities, where every employee has exactly the same rights as the rest and is treated fairly, both in terms of recruitment, remuneration, development, training and retirement.

The Company maintains its firm and non-negotiable commitment to provide a fair working environment, in which there is no place for discrimination against prospective employees, as well as between employees and partners.



The high level of education and specialization of DEPA's staff is a factor greatly affecting its success in the complex energy sector, due to the peculiarities of natural gas and the energy market in general. It is worth noting that approximately 63% of its staff are graduates of technical and higher education, while a large part of them hold at least one Master's Degree.

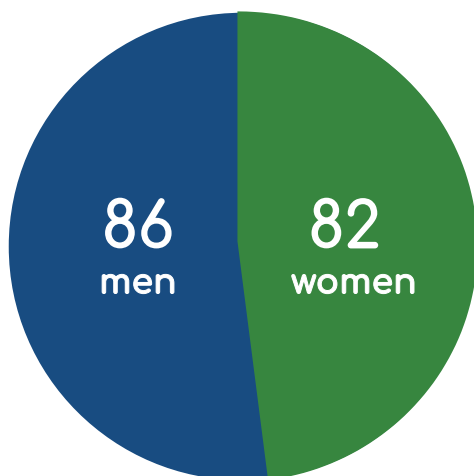


In the year 2020, at DEPA Commercial the total workforce amounted to 168 people, of which 86 were men and 82 were women, and all are employed in the Prefecture of Attica. For 2020, the Company had no part-time employees. In 2020, the number of new employees reached 23 people, of which 11 were women.

In 2020, 51 employees left, and this mainly concerned employees who were transferred to the newly established companies DEPA Infrastructure and DEPA International Projects. It is worth noting that a particularly important goal of DEPA for 2020, which was achieved, was to maintain the number of its employees at the levels of previous years.

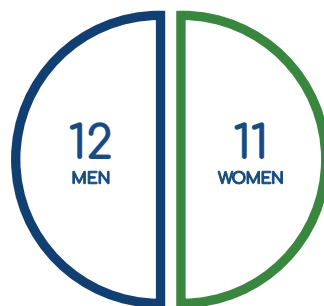
Number of Employees

168



NEW EMPLOYEES IN 2020

TOTAL NUMBER OF NEW EMPLOYEES 23



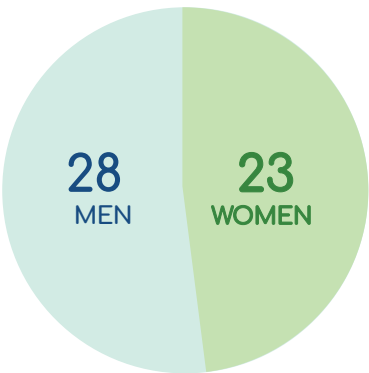
Total number of new Employees



<30 YEARS OLD 5
30-50 YEARS OLD 16
>50 YEARS OLD 2

TOTAL DATA OF EMPLOYEE DEPARTURES IN THE YEAR

Total of employee departures



Employee departures 

- <30 YEARS OLD 1
- 30-50 YEARS OLD 33
- >50 YEARS OLD 17

51 IN 2020, 51 EMPLOYEES LEFT, AND THIS MAINLY CONCERNED EMPLOYEES WHO WERE TRANSFERRED TO THE NEWLY ESTABLISHED COMPANIES DEPA INFRASTRUCTURE AND DEPA INTERNATIONAL PROJECTS.

DETAILS OF EMPLOYEES BY TYPE OF EMPLOYMENT

Total number of employees with an open-ended contract*

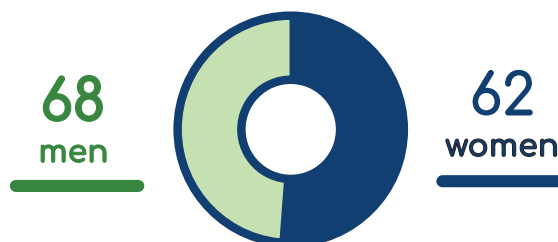
33 IT CONCERNS PERSONNEL WITH A DIRECT WORKING RELATIONSHIP WITH DEPA



Total number of employees
with a fixed term contract**

130

** CONTRACTOR'S STAFF



In terms of return to work and staff retention rates after parental leave, the total number of employees entitled **to parental leave** in 2020 was **11 (6 Men, 5 Women)**. A total of 5 women took a maternity leave and of them one returned to work in 2020, with the leaves of the remaining women continued in 2021.



The employment terms in the Company are determined by collective agreements drawn up after negotiations between Management and employees. The collective negotiations between the Company Management and employees in 2020 were conducted within the framework defined by the legislative regulations for public enterprises. DEPA Commercial implements all legislative regulations for public sector companies.

Wages are determined based on the applicable Collective Labor Agreement, which does not provide for gender pay differentiation, thus treating all employees of the company equally, regardless of gender.



The Company offers certain benefits to full-time employees (which do not apply to seasonal or part-time employees), such as:

- cover any disability/incapacity
- children's camp grant
- life insurance
- maternity/paternity leave
- Christmas gifts for employee children
- rewarding straight A students children of employees
- medical care
- retirement provision
- travel cards for Mass Transportation provided



Training



Investing in human resources training is particularly important for any Company, since this constitutes a pillar of building a competitive advantage. For DEPA Commercial S.A., the professional education, training and technical expertise of employees is vitally important, to tackle modern challenges. In this direction, the company consistently invests in the professional development of its staff, organizing education and training programs, which set the framework for ensuring and improving their knowledge, skills and talents to achieve its competitiveness.

DEPA Commercial recognizes the importance of equality between employees and of ensuring equal rights for all employees. All employees are given the same opportunities for growth and development, without discrimination based on ethnicity, religion, and gender.

Through training, information from the media, supervision of work, evaluation of proposals for improvement and participation in consultation, staff are motivated, and develop awareness on issues related to the Environment and Health & Safety.



All DEPA Commercial employees are aware of:

- ✓ the Environment and Health & Safety Policy at work
- ✓ significant environmental aspects and environmental impacts (actual and potential) related to their work
- ✓ the risks for Health & Safety and the effects of situations created during work, as presented in the WORA of the Bus Fueling Stations and the Administration Buildings
- ✓ their contribution in the system's effectiveness, including performance improvement benefits
- ✓ the consequences of non-compliance with the system requirements, including compliance obligations



In any case, those workers who could, due to the nature of their work, cause a significant burden on the Environment or endanger themselves or their colleagues, are properly trained to offer their services by taking all the necessary measures for the minimization or elimination of negative effects.

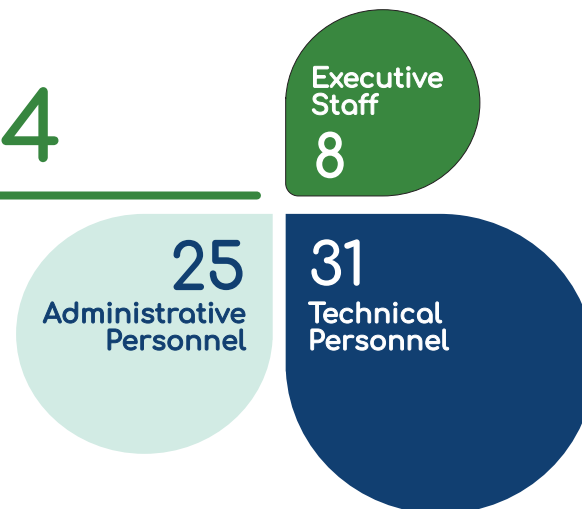
In addition to the Company's personnel, significant effects on the Environment and on Health & Safety can be caused by the contractors who work in the facilities of DEPA Commercial. This is why the Company informs the staff of contractors and takes all necessary precautionary measures.

During 2020, the company employees participated in a total of 7 seminars, 4 conferences and 2 intracompany programs. The total hours of educational programs implemented in 2020 amounted to 809 hours.

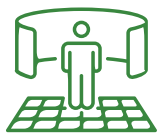
TRAINING PROGRAMS 2020

Total number of employees who attended the training programs **64**

(in and outside the company)

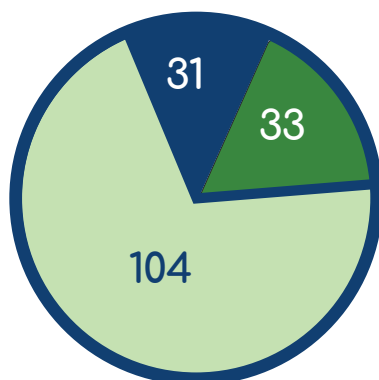


2020 TRAINING PROGRAMS SUBJECT MATTERS



56 Total number of employees who attended in-house training programs

One of the programs attended by intracompany employees in 2020 was about Health & Safety for the ISO certification.



Average hours of training per year/employee, based on employee category and gender

168



NUMBER OF HOURS OF TRAINING/ EDUCATION OF ALL STAFF MEMBERS



Total number of hours of training/education of all staff members	809
Total number of hours of training/education (Men)	574
Total number of hours of training/education (Women)	235
Total number of hours of training/education (Executive staff)	106
Total number of hours of training/education (Administrative staff)	307
Total number of hours of training/education (Technical staff)	396
Average training time per employee	4.82
Average of training hours per employee (Men)	6.67
Average of training hours per employee (women)	2.87
Average of training hours per employee (Executive staff)	3.21
Average of training hours per employee (Administrative staff)	2.95
Average of training hours per employee (Technical staff)	12.77

Due to the strict measures against the pandemic, which the company took this year, the trainings were limited to the amount of €15,000. In recent years, the annual expenditure for staff training has been around €100,000.

Information - Participation and Consultation

The Company is aware of the effect of any matters concerning operational changes on its employees, as well as their determination in collective agreements. Thus, it ensures that there is sufficient time to ensure the necessary adaptation of employees to the new data. If an issue of this nature arises, there is a relevant provision in the Internal Labor Regulation, where the employee's consent is requested.

Common questions for consultation are:



- the results of the Written Occupational Risk Assessment and the assessment of existing or new "compliance obligations"
- the choice of means of personal protection
- the choice of equipment and work tools
- taking measures upon evaluation of the results of the measurements of harmful factors
- investigating incidents
- implementing initiatives related to the occurrence of non-compliances
- other issues related to Health & Safety at work

Composition of governing bodies and analysis of employees by employee category, according to gender, age group, whether they belong to minority groups and other indicators of diversity

PERCENTAGES OF PEOPLE PARTICIPATING IN THE COMPANY'S GOVERNANCE BODIES (E.G. BOARD OF DIRECTORS) ACCORDING TO THE FOLLOWING CATEGORIES 2020

Total number of Board members participating in the company's governing bodies

11



Number of men participating in the company's governing bodies

9

88.9%



Number of women participating in the company's governing bodies

2

11.1%



Number of people aged 30-50 who participate in the company's governing bodies

2

18.2%



Number of people aged >50 who participate in the company's governing bodies

9

81.8%

PERCENTAGE OF PEOPLE PARTICIPATING IN THE EXECUTIVE STAFF, IN ACCORDANCE WITH THE FOLLOWING CATEGORIES 2020

Total number of people participating in the Executive staff of the Company

33



Number of people participating in the Executive staff of the company (Men)

17
51.5%



Number of people participating in the Executive staff of the company (Women)

16
48.5%



Number of company executives (30-50 years old)

9
27.3%



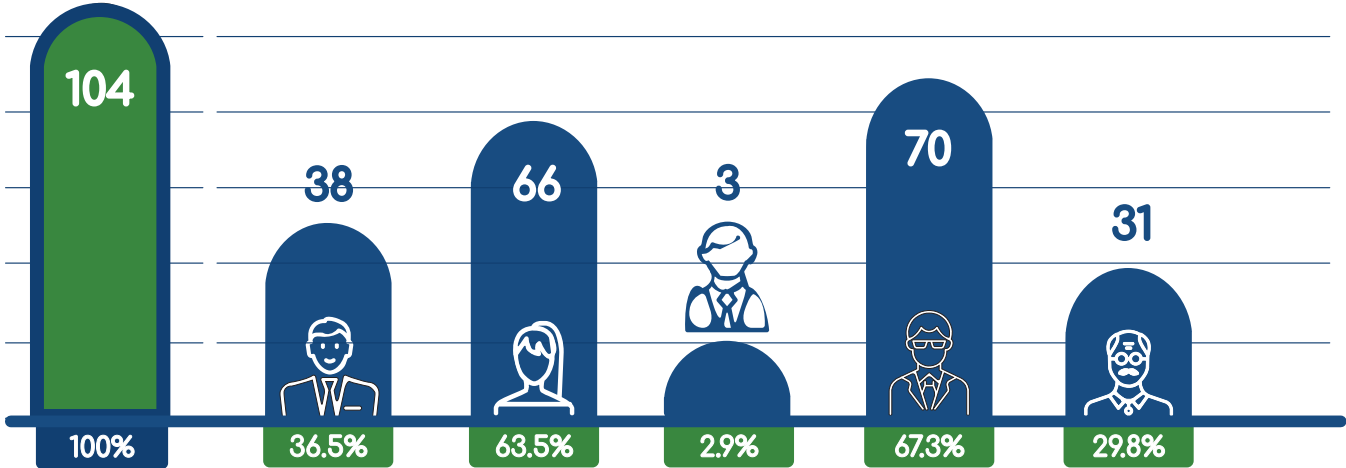
Number of company executives (>50 years old)

24
72.7%






PERCENTAGE OF PEOPLE PARTICIPATING IN THE ADMINISTRATIVE STAFF, IN ACCORDANCE WITH THE FOLLOWING CATEGORIES 2020

Total number of people participating in the Administrative staff of the company

104



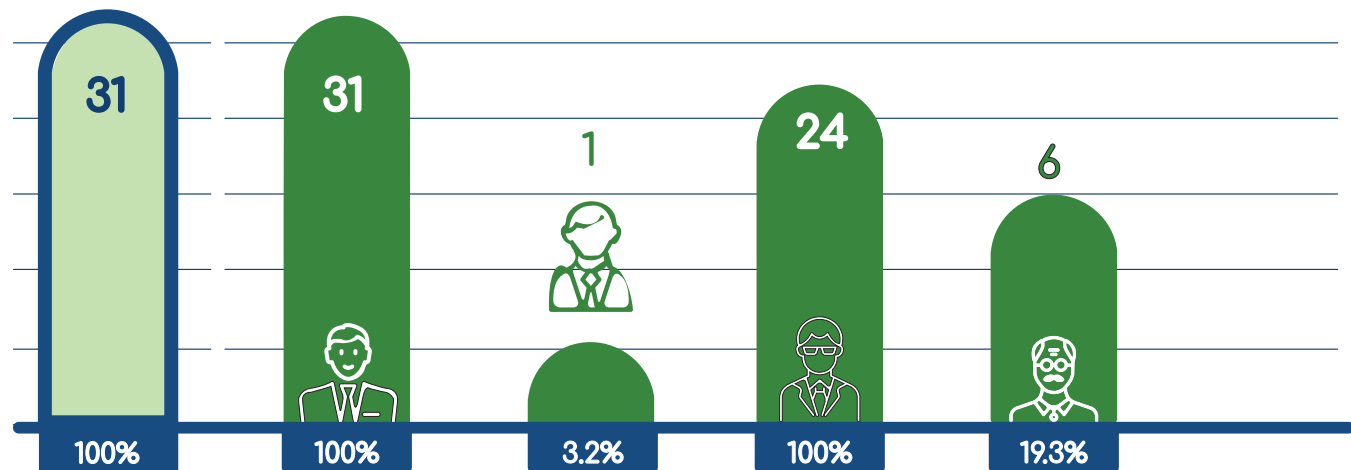
MEMORANDUM

			
MEN	<30 YEARS OLD		
			
>50 YEARS OLD	WOMEN	30 - 50 YEARS OLD	

PERCENTAGE OF PEOPLE PARTICIPATING IN
THE TECHNICAL STAFF, IN ACCORDANCE
WITH THE FOLLOWING CATEGORIES 2020

Total number of people
participating in the Technical
staff of the company

31



It is noted that in the year 2020 there was no complaint concerning the violation of labor practices nor were they detected by the official relevant corporate mechanisms.





The DEPA Commercial staff is the company's driving force. Therefore, health and safety at workplace is the primary objective and obligation of the Company. In order to ensure a working environment in which the employees of DEPA Commercial, partners and visitors will not be exposed to risks capable of causing injuries or occupational diseases, all safety measures are faithfully implemented and observed in full compliance with the national and European legislation. The Company has recognized that a prerequisite for its continuous and sustainable development is a healthy and safe working environment. In this context, it continuously strives for the continuous improvement of the conditions within the workplace and of course the prevention of accidents both of its employees and of its external partners.

The Process, Safety and Quality Operations Directorate is responsible for managing all matters relating to health and safety.

At the same time, through the Company's code of conduct and ethics, employees are informed that:

all employees and associates of the Company **must observe and apply health and safety rules in daily work activities**, contribute to the prevention of accidents, participate in safety and hygiene programs organized by the competent services and immediately report to the competent authorities for Health and Safety, situations that may cause accidents.



the Company's executives, employees and partners are not allowed **to use illegal substances or consume alcoholic beverages** during working hours.



the Company is particularly aware and promotes issues of daily safety of its staff. Thus, aiming at safe driving, it does **not allow** its executives, employees and partners **to use mobile phones while driving** during their business trips.



Health & Safety Policy

DEPA Commercial is committed to operating in a manner that respects the Health & Safety of its employees. The Company strives to minimize and eliminate the risks for the Health & Safety of its employees, partners, customers, and visitors in its premises.

More specifically, it is committed to:

- it prevents work accidents and occupational diseases



- determines objectives and improvement programs, which it systematically reviews in pursuit of the continuous and further improvement of the Company's performance on Health & Safety matters



- ensures that the entire staff are constantly informed about the effects of their activities on Managing Health & Safety at work, as well as aware of all related issues



- communicates and makes this policy available to all employees of the company



- complies with all the relevant legal and other obligations, regarding Employee Health & Safety



- cooperates with national and local bodies, that are responsible for Health & Safety at work



- ensures the availability of the necessary resources to establish, implement, maintain and improve the Health & Safety System



The Company Policy is achieved by implementing a Health & Safety Management System at work which meets the requirements of ISO 45001:2018. The Company is certified and holds the respective ISO 45001:2018 certification.

Duties and Roles

The Top Management of DEPA has defined specific duties and roles for the employees, so that the Health & Safety System is implemented interruptedly. The CEO chairs the Review Committee and approves the documented information that is kept up to date in the form of Manuals and Procedures, as well as any critical decision regarding the management of the Health & Safety System.

Administrative Systems Manager

For the proper operation of the Administrative Systems, the supervision is carried out by the Head of the Processes, Safety and Quality Directorate (PSQO). For the proper operation of the System, the Head of the Processes, Safety and Quality Directorate (PSQO), who oversees the Management Systems, has been appointed as the Management Representative.

Among other duties, the PSQO:

- has as its main responsibility the coordination of the actions that ensure that the Health & Safety System is implemented, maintained and improved in accordance with the requirements ISO 45001:2018.
- reports to Top Management on the performance of the System following a Review, and other usual and extraordinary updates. shaping improvement proposals. Especially for Health and Safety at Work the responsibility for the operation of the H&S Management System rests with the Health & Safety Manager who reports to the PSQO. The company's statutory bodies, i.e. the Safety Technician and Occupational Doctor, also greatly contribute with their own observations, suggestions and advice to the development of business awareness on Health & Safety.



At the Bus Fueling Stations, due to the nature of DEPA's operations, the Head of the Stations has an important role in the implementation and control of the established procedures. All DEPA employees have as a basic responsibility the implementation of the documented information that has been compiled and communicated to them, so that the tasks undertaken can be carried out Safely, without endangering their Health.

Participation and Consultation

Employees have the legal right to form an Employee Health & Safety Committee (EHSC) in accordance with L. 3850/2010. By the initiative of the Employees' Union, a Health & Safety Committee has been set up, with the participation of employee representatives. Important Health & Safety and Environmental issues are discussed in depth at the Committee and its meetings are a wider consultation body. This Group is set up on the initiative of the Employees' Union and includes the Processes, Safety and Quality Directorate Officer (PSQO) and the HSW Manager. Employees have been given the right to freely send suggestions for improvement either through the intranet, or in boxes that can be placed in various parts of DEPA's facilities. Employees participate in the consultation on Health & Safety issues at work, which takes place in a number of ways.

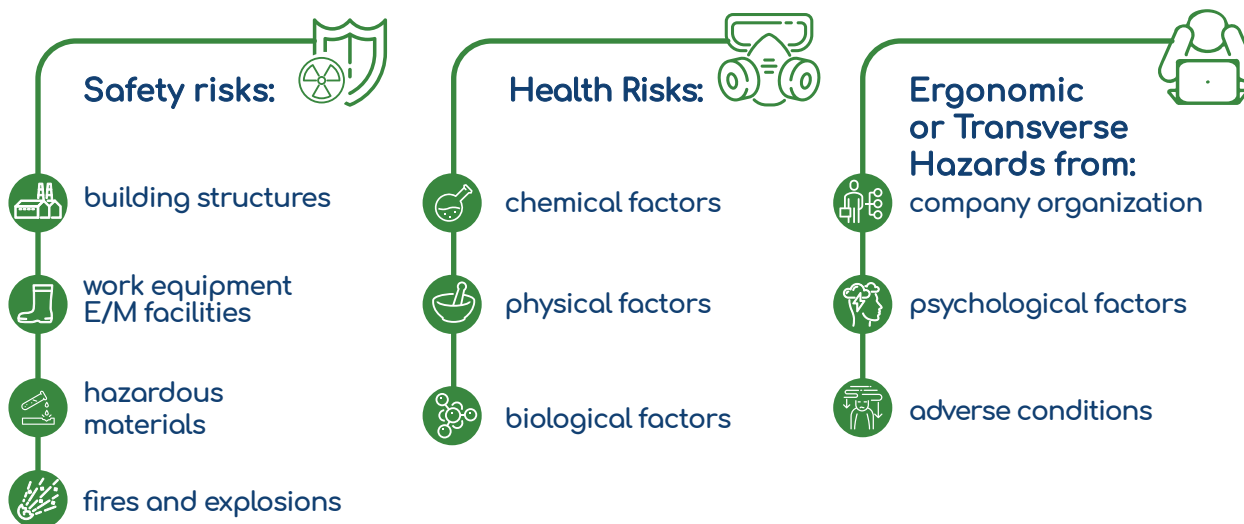
Common questions for consultation are: _____

- the results of the Written Occupational Risk Assessment and the assessment of existing or new "compliance obligations"
- the choice of means of personal protection
- the choice of equipment and work tools
- taking measures upon evaluation of the results of the measurements of harmful factors
- investigating incidents
- implementing initiatives related to the occurrence of non-compliances
- other issues related to Health & Safety at work

The Management is committed to providing employees with all the necessary resources (participation time, training, etc.) to ensure their effective participation in the consultation.

Risks

The recognition of Health & Safety risks at work is a statutory obligation and is implemented through the Written Occupational Risk Assessment.



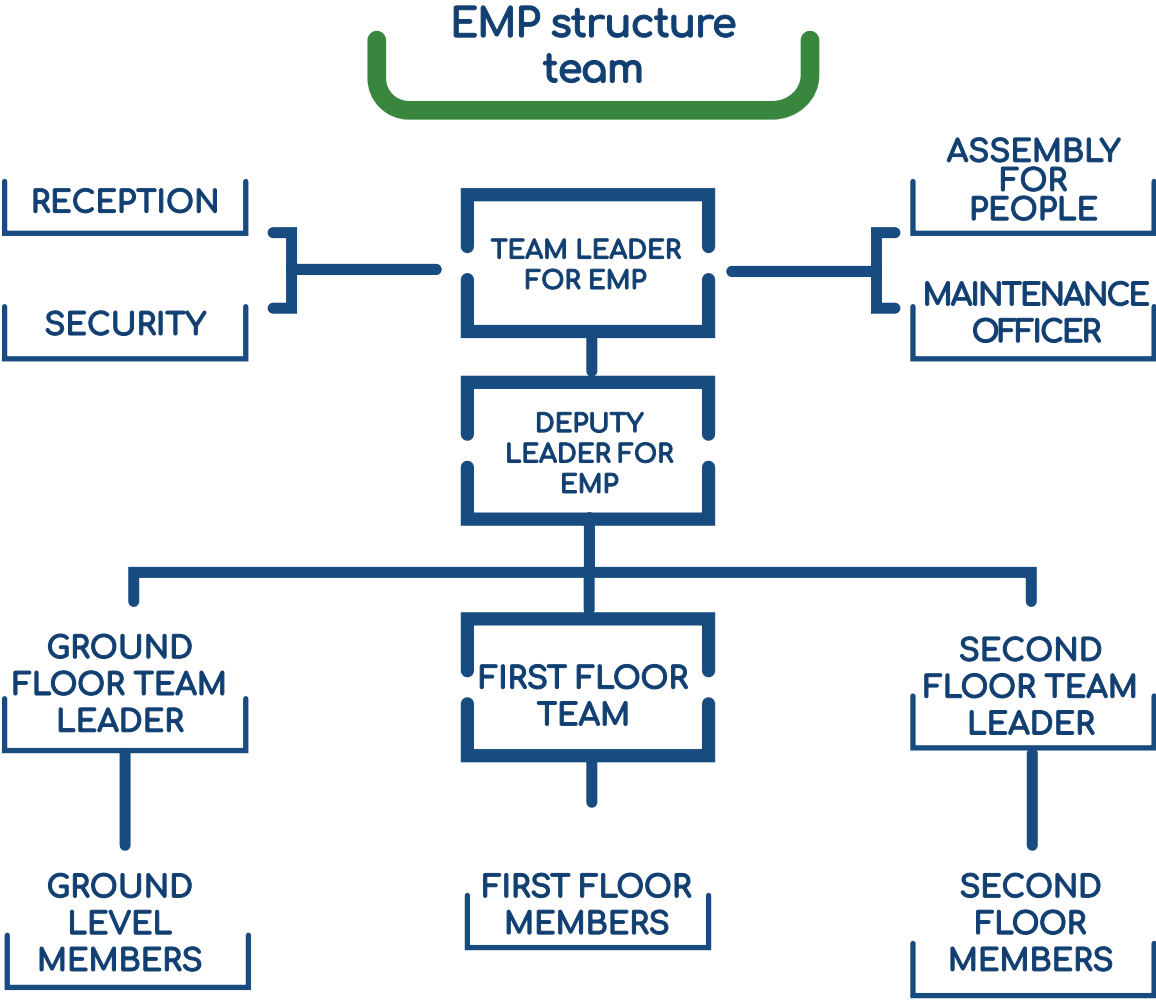
Risk Management

Emergencies Management Plan (EMP): DEPA Commercial has established a team that can deal with and help mainly employees in situations of danger such as: fire in the building, earthquake, bomb threat or accident. The EMP for the offices of DEPA has been drawn up, taking into account these risk categories, while the Emergency Situations Management team has been established. The members of this group know how to act in such cases, in order to guide, protect and support their colleagues and third parties, and if possible, to deal with the danger.

Program updates

Aiming to make the program effective, updates are carried out at regular intervals, in order to modernize and apply it correctly.

Staff should be fully informed of team actions and planning in order to understand and support the team without inadvertently complicating the process of dealing with any risk.



Health & Safety of
Employees during the
COVID-19 pandemic

In the year 2020, DEPA Commercial took extraordinary security measures to protect its employees and citizens against the COVID-19 pandemic.

These initiatives include



adoption of an extensive telecommuting program, with the majority of its employees working from home in rotation, minimizing attendance at company premises



regular disinfection in all workplaces.



availability of appropriate means of personal protection (PPE) and prevention



preparation of a Plan to Manage Suspicious Coronavirus Cases to ensure the uninterrupted operation of the Company



avoiding meetings inside the Company building and switching to other forms of communication (teleconferences)



compliance with all protection and prevention measures, and simultaneous revision of the Emergency Management Regulation



conducting frequent laboratory tests for COVID on employees and external partners and their entry into the Company subject to a negative result



Due to the special health conditions, no employee trainings on emergency matters (building evacuation, fire safety and First Aid) were carried out, which are expected to be implemented by the end of 2021. The Occupational Doctor and Safety Technician services provided by the labor legislation continued to be provided by the External Protection and Prevention Services Company in 2020.

Suspicious Case Management Plan

DEPA has established a Suspicious Covid-19 Case Management Plan to manage and deal with incidents (suspicious or confirmed cases), during the pandemic.

The Officer responsible for Managing Suspicious Cases properly guides and supports all colleagues in order to immediately manage each incident with the safety of employees and their families in mind.

Update of the Suspicious Case Management Plan

The Suspicious Case Management Plan is modified when the relevant instructions of the EODY are revised, so that it remains up-to-date and able to be implemented sufficiently and effectively in the event that it becomes necessary to activate it. The supervision and update of the Plan is performed by the person responsible for the Plan to be kept in place.

Personnel Update

All employees employed by DEPA are informed and trained on the issues of the Plan, as well as on any new relevant directive/decision that is announced.

Employee Health & Safety Indicators

Deadly accidents

Zero fatal accidents

(total staff members and supervised employees)

00

Zero fatal injuries

(independent contractor employees working for the company, which is responsible for their safety)

00



RATE OF INJURIES

Total working hours for staff
(total staff members and supervised employees)



310,890



165,268

Total working hours for men



145,622

Total working hours for women

Total working hours for staff

(independent contractor employees working for the company, which is responsible for their safety)

0

Total number of injuries
(total staff members and supervised employees)

4



3



1

These are accidents that took place within working hours. Light injuries in all 4 incidents.

INJURY RATE (IR)  

INJURY RATE (IR) Men 3,630

INJURY RATE (IR) Women 1,373

TOTAL EMPLOYEES AND SUPERVISED EMPLOYEES

INDEX OF DAYS LOST DUE TO INJURIES OR OCCUPATIONAL DISEASES

Total days lost for staff
(total employees and supervised employees)



964



673

Total lost days for men



291

Total lost days for women

Total lost days of staff
(independent contractor employees working for the company, which is responsible for their safety)

0

Total working days for staff (total staff members and supervised employees)



37,293

Total number
of working days
18,193



Total number
of working days
19,100

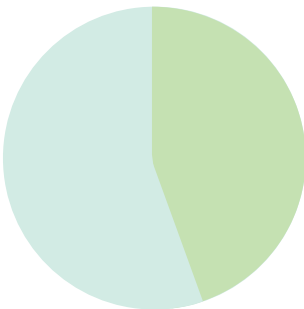
Total manpower work days
(independent contractor
employees working for the
company, which is responsible
for their safety) 0

Total staff absences
(total staff members and
supervised employees)



59

Total
absences women
37



Total
absences men
22



In 2020, due to the pandemic, DEPA Commercial focused on donations to hospitals and health centers. Among its most important initiatives was the program for over the phone counseling, which concerned the protection of the mental health of employees and their family members, as well as the sponsorship of three scholarships for postgraduate studies at the Athens University of Economics and Business.

During 2020, the Corporate Social Responsibility Initiatives continued, implementing practices aimed at:



care for the health and safety of employees and partners
(employee over the phone counseling)

the promotion of Sustainable Development and formation of a culture around clean energy (program for ecological movement of employees, recycling program, donation of NG fuel to the Smile of the Child)

support the society

the development and implementation of programs and actions that contribute to the achievement of social well-being and social cohesion

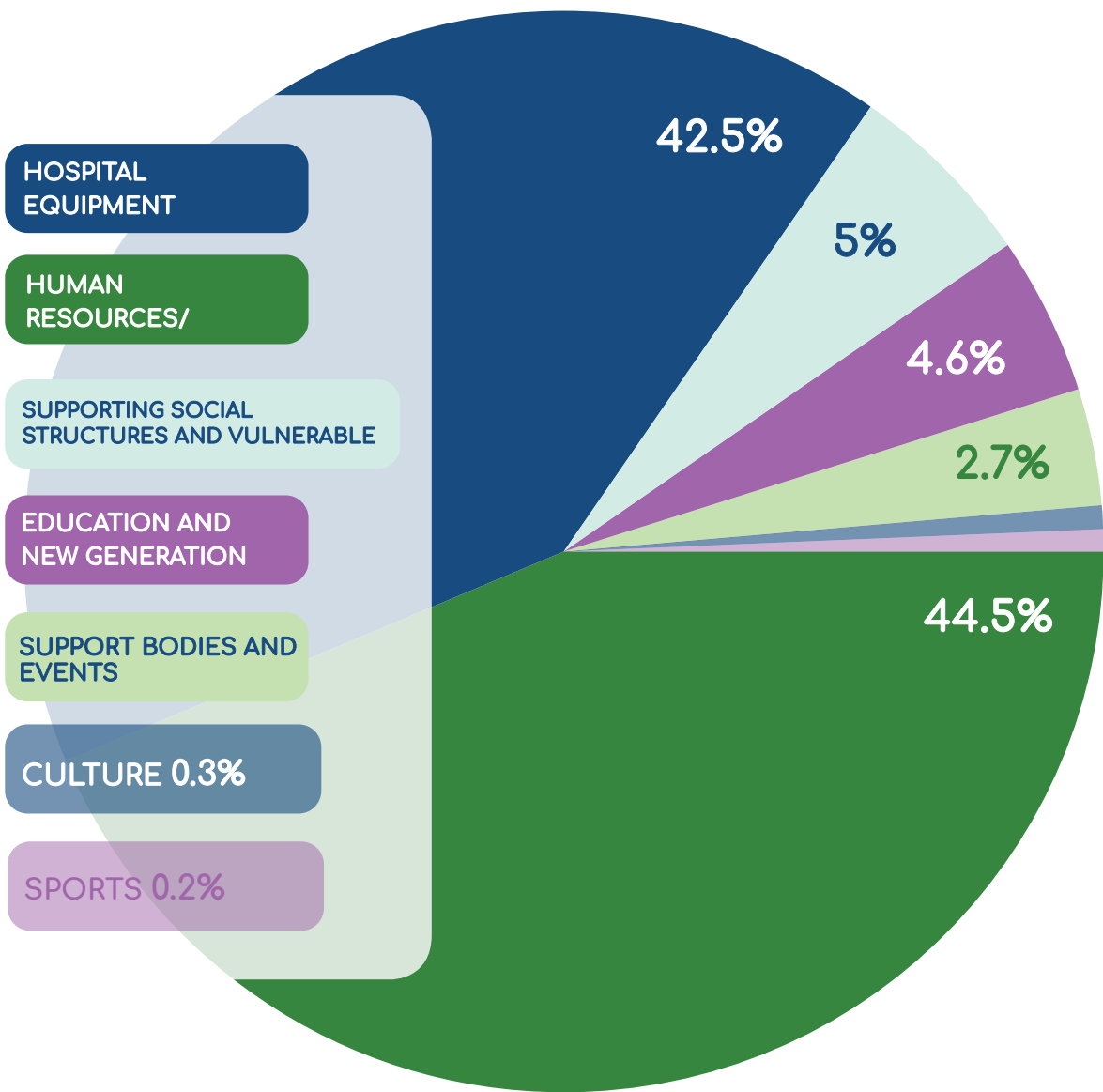
promote transparency and ethos

encourage young people

maintain meaningful communication with all interested parties (stakeholders)

In the difficult year of 2020, the COVID-19 pandemic defined the needs and response times of companies active in the field of responsibility. The main part of the Company's annual program was adjusted to meet the additional needs that arose. The corporate responsibility program for the previous year focused on the employees and society. At the same time, the Company supported the local communities in which it operates, emphasizing vulnerable groups, with various benefits and support. In this context, donations of medical technological equipment were granted to public hospital units and also to health centers throughout Greece.

Cumulative percentages of the Company's social initiatives



Governance



Corporate Governance



DEPA Commercial shapes a new
operation and development philosophy,
always aiming to transparency in all actions,
and responsibility.



The Corporate Governance framework of DEPA Commercial is being described in this particular section. The principle of transparency is a critical component of effective corporate governance, as it promotes its proper operation and execution.

DEPA Commercial has fully adopted the internationally recognized practices that incorporate transparency and at the same time aim at the responsible operation of the company in all areas of its activity.



Compliance with the Laws of the State and the Internal Regulations of the Company

Compliance with the law not only prevents the company from being fined, but also helps to maintain its good reputation in the market. Everyone must comply with every rule of law enacted by the Greek State, as well as respect all Policies and Regulations that the Company has deemed appropriate to record and which help it to operate successfully. Knowledge of the rules and regulations governing daily work is imperative for everyone. In the event that questions and doubts arise regarding the legality of actions, everyone should contact the company's Legal Activities Department for clarification. Moreover, all Company executives must guide and explain to their subordinates the rules of legislation, business and competition law. Furthermore, they must report to the Corporate Ethics Committee cases of non-compliance and indicate the areas where internal rules can be improved to ensure the Company's more efficient operation.

Corporate Governance Code

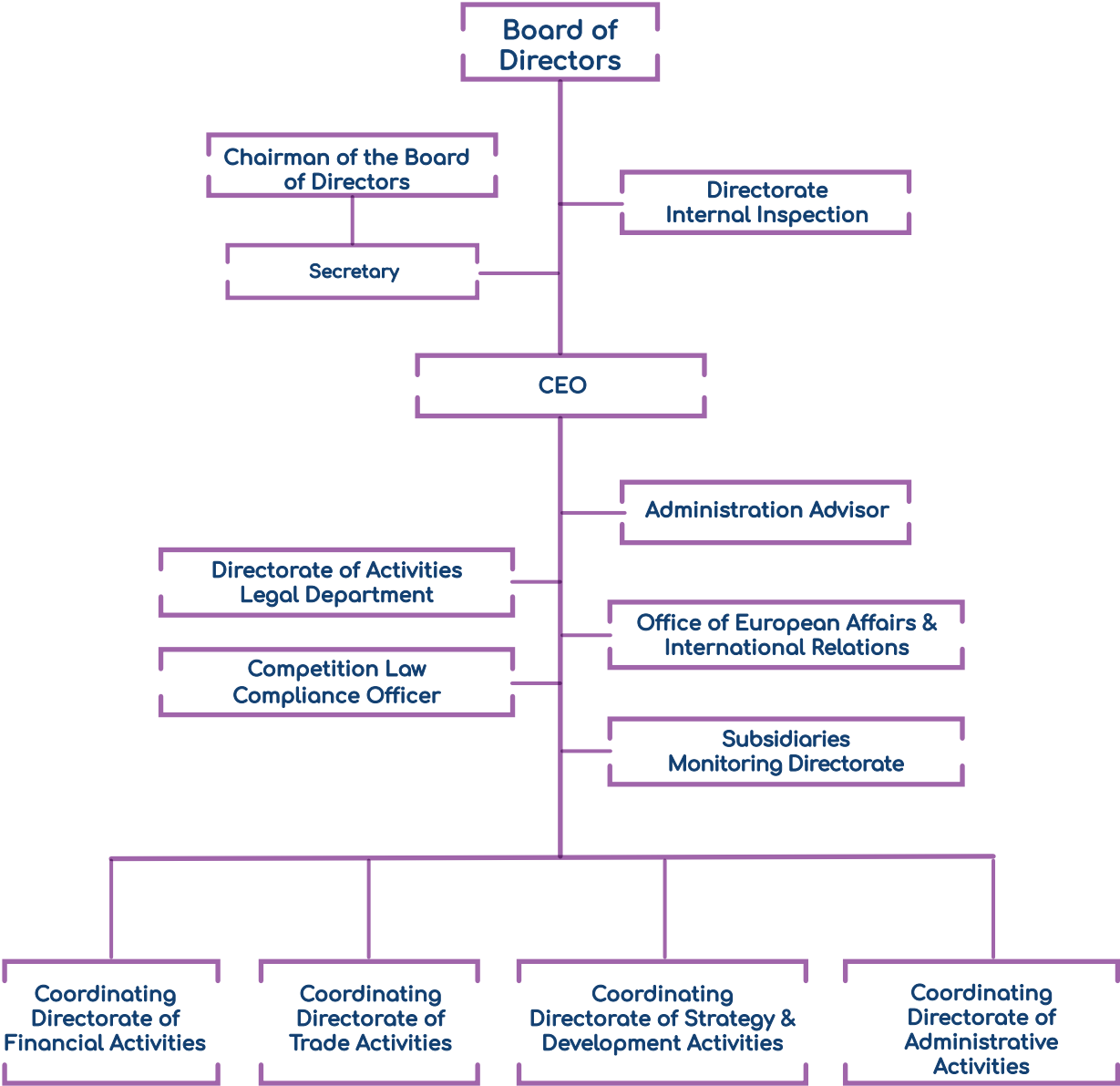
With the primary purpose of ensuring transparency, the correct and responsible operation of the Company in all its activities, as well as the strengthening of the feeling of trust in all interested parties, DEPA Commercial voluntarily adopted the Corporate Governance Code, as published on the company website. The Company consciously draws up its strategy, based on its values and principles, which shape its relationships of trust with society, consumers and shareholders, always based on the highest standards of entrepreneurship and the best practices of corporate governance. At the same time, it follows policies that guarantee a high level of service provision, respect the environment, listen to the needs of society and ensure in a transparent and fair manner the interests of its shareholders and the lasting prosperity of the Company.

Composition of the Board of Directors

DEPA Commercial is governed by a Board of Directors, consisting of 11 (eleven) members. The BoD, in addition to running the Company, also represents it. The objective of the Board of Directors is the strengthening of the economic value and efficiency of the Company, the defense of the corporate interest and its substantial and practical contribution to the achievement of sustainable development.

<p>The composition of the Board of Directors on 31.12.2020 was as follows:</p> <p>IOANNIS PAPADOPOULOS Chairman of the Board of Directors</p> <p>KONSTANTINOS ANDRIOSOPOULOS Vice-Chairman of the Board of</p> <p>KONSTANTINOS XIFARAS CEO</p>	<p>MEMBERS</p> <p>PANAGIOTIS DIMITROPOULOS ELENI ZILAKAKI PAVLOS KAMARAS EVANGELOS KOSMAS MARIKA LAMBROU DIMITRIOS SAMOLIS DIMITRIOS SKALAIOS ASIMAKIS FOTOPOULOS</p> <p>It should be noted that E. Kosmas, and E. Zilakaki are members of the BoD - Employee Representatives.</p>
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Company Organizational Chart



Company Organizational



It is noted that the Administrative Services, also in the year 2020, provided support and assurance services for the orderly administrative operation of both the Company and the companies that resulted from the transformation of the Group based on L. 4643/2019. The principle has always been to maintain a high level, and improve - where required - corporate operations. In this context, the Administrative Services mainly contributed to the complete renovation of the administrative building on 207, Mesogeion Avenue, in order to be leased, at the end of this year, to the companies DEPA Infrastructure S.A., DEPA International Projects S.A. and OFYPEKA. Moreover, the management of all Operational Support service contracts of the Administrative Services (landline-mobile telephony, Mail Management, Vehicle Leasing, Custody, Cleaning, preventive maintenance of fire detection/fire safety systems, air conditioning, elevators, etc.) continued seamlessly, with the aim of ensuring the optimal quality-price ratio for the Company.

Code of Professional Conduct and Ethics



The priorities of the Company include awareness of the interested parties on the corporate principles and values and are the driving force for the achievement of DEPA's vision. The basic tool through which the principles and values of the Company are communicated to all interested parties is the Code of Professional Conduct and Ethics, which is also published on the company website (<https://www.depa.gr/wp-content/uploads/2018/12/kodikas-epaggelmatikis-deontologias.pdf>).

This Code defines the general framework of acceptable professional behavior for the company. Its purpose is to explain to those it addresses the values of DEPA Commercial, describe the principles of professional conduct and ethics, according to which the Company wants to operate, and to be the guide for the daily professional behavior of all its people. It applies to all of the Company's employees, partners and in general to those who provide services to the Company.

This Code is not exhaustive, but is supplemented by the Company's Procedures and Policies, the Internal Work Regulations, as well as the Code of Compliance with Law and Competition Rules.

DEPA Commercial operates based on its values, which include:



compliance with the laws and Competition Law



preserving and protecting integrity, transparency and



compliance with the Company regulations



impartiality, the principle of equal treatment and respect for human beings



honest and fair conduct

The members of DEPA Commercial's Management, its executives, employees and partners must understand and share the Company's values and adopt professional behaviors and actions governed by them. In particular, the members of the Management and the executives of the Company are charged with the task of inspiring with their example and communicating to the staff and partners the message of ethics in professional practices. This way, the Company will continue to maintain its high status and good reputation in society and the market.

A point of reference for the implementation of the Code of Professional Conduct and Ethics is the establishment of the Company's five-member Corporate Ethics Committee, which:



provides instructions and clarifications regarding the Code's implementation

recommends disciplinary sanctions in cases of proven violation of the Code

receives reports for violations or possible violations of the Code

informs the Board of Directors accordingly.

recommends the improvement or adaptation of the Code

carries out special inspections to confirm any Code violation reports

identifies areas or processes that are vulnerable to the occurrence of inappropriate or illegal actions and suggests measures to shield the Company

Anti-Corruption, Bribery and Unfair Competition Policy

DEPA Commercial has recognized as an essential parameter and constituent element of its operation, the transparency of transactions and the strict observance of the legislation in every transaction carried out in the context of its business activities. The Company seeks by all appropriate means to limit its exposure to conditions that may favor incidents of corruption, bribery or unfair competition, while at the same time cultivating a culture of compliance with the law in which corruption and bribery have no place.

Through the policy it implements for the strategic fight against corruption and bribery, the Company takes a series of actions in order to exclude the occurrence of related incidents, effectively promoting the defense of transparency and integrity which are its fundamental values.

Indicatively:

1

the Company supports the effort to ensure integrity and transparency in the wholesale natural gas market regulated by the EU Regulation number 1227/2011 («Regulation on wholesale energy market integrity and transparency», known as «REMIT»). Therefore, it complies with the said Regulation, aiming to create and strengthen confidence in the domestic energy markets, as well as to ensure an environment of objective and competitive prices of the relevant products (natural gas) for the benefit of consumers.

2

at DEPA Commercial, only open, transparent and legal actions are being pursuit and applauded. The Company does not accept and does not allow its Management members, its executives, employees and partners to provide any service, amount of money or any other benefit of value to a third public or private employee, with the purpose of influencing them to inappropriately perform their professional duties or to maintain business activities or to secure an unfair business advantage

- 3 the Company refrains from any funding of political activities in order to ensure the full transparency of its operation. Competent is the Internal Inspection Department, which in turn is supervised by the Inspection Committee made up of members of the Board of Directors
- 4 inspections are carried out in Financing, Contract Management, as well as Project Support and Management, Studies and Special Corporate Development Projects, Compliance with Competition Law, Gas Sales, Commercial and Pricing Policy, Corporate Program Implementation Planning and Social Responsibility
- 5 the environment in which the Company operates is analyzed in order to identify and record potential risks or threats or events that may encourage the existence of incidents of corruption and bribery in the corporate environment
- 6 due diligence procedures are applied to the third parties with whom the Company is going to cooperate or is already cooperating and their performance in the fight against corruption and bribery is thoroughly checked
- 7 checks are carried out systematically which ensure the correct selection of suppliers, the correctness of payments and their corresponding registration and recognition in the Company's accounting books

Bribery is the acceptance of any item with a value greater than €50, with the purpose of influencing a decision or providing an unfair advantage. Accepting gifts does not only involve acceptance of cash. Receiving luxury gifts and products, scholarships, tickets to athletic events, jewelry or precious stones are also considered bribery. An important aspect of the definition of "bribery" is the purpose of the payment. Anti-corruption laws prohibit the acceptance of anything of value for the purpose of obtaining business, retaining existing business, or securing an improper advantage.



This also includes securing licenses or regulatory approvals, preventing adverse government action, reducing taxes, avoiding duties or preventing a competitor from bidding on a tender. The Company places particular emphasis on integrity and transparency in all forms of business activity and does not accept any bribery or gifts by its employees and partners. Thus, according to the Company's Gift Policy, it is not allowed to: members of the Management, executives, employees, partners and in general those who provide services to the Company, as well as their spouses and relatives up to the second degree, receive gifts of any kind or anything worth over €50 from the Company's competitors, suppliers, customers or partners. Gifts of small value that are given in accordance with normal business ethics and are a manifestation of social decency are excluded. Under no circumstances are monetary amounts allowed as gifts, regardless of the amount. If an employee or partner is in doubt about accepting a gift from a potential supplier/partner or customer, they should discuss it with their supervisor or the Corporate Ethics Committee.

It is worth noting that **100% of the members of the Company's highest governing body, as well as 100% of all employees, are aware of the company's anti-corruption policies and procedures.** All members of the Company's governance receive copies of the Code of Corporate Conduct and Ethics, which includes detailed provisions on anti-corruption issues. Moreover, all staff members were fully informed about all matters included in the Company's Corporate Conduct and Ethics Code. Also, when a new employee joins DEPA Commercial, an extensive briefing is given by the Human Resources Activities Department on issues related to the Code of Corporate Conduct and Ethics. For the information of all interested parties, the relevant anti-corruption policies and procedures are posted on the Company's website. **For 2020, DEPA Commercial did not have any corruption incident reported.** Also, there was no complaint for any negative impact of the Company on society.





The goal is to create a Green power portfolio of more than 240 MW, by participating in photovoltaic or wind projects that are in the development stage or in operation.



LIMITS AND RESTRICTIONS

IMPORTANT MATTERS	LIMITS WITHIN THE COMPANY	LIMITS OUTSIDE THE COMPANY	RESTRICTIONS INSIDE AND OUTSIDE THE COMPANY
Financial Performance	Shareholding Employees	Clients Suppliers Subsidiaries Companies	This Corporate Responsibility Report concerns the activities of DEPA Commercial
Indirect Financial Effect		Media Local Society	
Energy		Regulatory Authorities Government Suppliers Subsidiaries	
Protection of Biodiversity		Media Local Society	
Environmental Impact			
Water Management			
Waste Management			

LIMITS AND RESTRICTIONS

IMPORTANT MATTERS	LIMITS WITHIN THE COMPANY	LIMITS OUTSIDE THE COMPANY	RESTRICTIONS INSIDE AND OUTSIDE THE COMPANY
Employment	Employees	Local Society	
Health & Safety at work	Employees	Regulatory Authorities	
Training and Education	Employees		
Diversity and equal opportunities	Employees	Regulatory Authorities	
Avoiding Discrimination		Regulatory Authorities Suppliers Subsidiaries	
Local Communities	Employees		
Combatting Corruption	Employees	Regulatory Authorities Government	

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