



# SUSTAINABILITY REPORT

# 2021



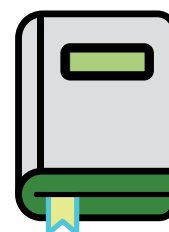
**DEPA Commercial S.A.**



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# Message from the Management

GRI 2-22

DEPA has been intertwined with the supply of natural gas and energy security in Greece for 35 years. In recent years, it has been implementing an ambitious plan that has been transforming it from a gas company into a vertically integrated energy business, through investments at all levels leading it to a future of strong momentum and prospects.

The driver for DEPA's growth is the steady expansion of the use of natural gas in our country. It is noteworthy that its use in electricity generation has increased by about 17%. At the same time, the Greek market recorded the highest annual gas consumption by volume ever (70 TWh), with an increase of 10.9%. Based on these figures, it is a "logical" development that the volume of natural gas sales increased by 57% compared to the previous year.

The company plays a leading role in the effort to expand the use of natural gas, offering new technologies (small-scale liquefied natural gas (LNG), compressed natural gas (CNG), etc.)

as well as infrastructure. In addition, it is a founding member of the European Clean Hydrogen Alliance and a member of the European Association of Hydrogen (Hydrogen Europe) developing independent projects in alternative and cleaner fuels.

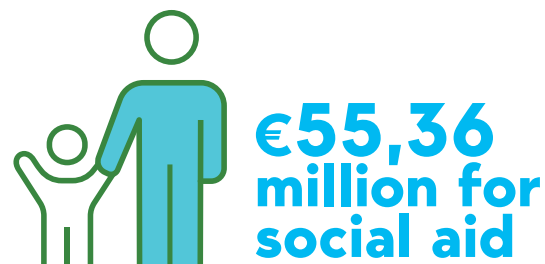
In an energy environment of challenges, crises and the now established need for policies and practices that will address climate change, natural gas is part of the solution and a "pathway" to green entrepreneurship and an energy neutral economy in general. Green energy is here to stay and DEPA is actively participating in the transformation taking place.

Natural gas is part of the solution and a "pathway" to green entrepreneurship and an energy neutral economy in general

DEPA also highly resilient to the pressures created by successive crises. It offers solutions to the ever-increasing needs of its customers. At the same time, it places great emphasis on ensuring social cohesion. For this reason, it developed a mechanism to absorb part of the gas cost increases through which domestic consumers supplied directly or indirectly received discounts of 16% for October and November and 40% for December on the wholesale gas supply price. The company's investment for the provision of these social aids/ discounts amounted to €55.36 million.

Moreover, DEPA also cares and continuously improves its environmental, social and economic footprint. In this context, it has adopted ESG criteria and Sustainable Development standards, aiming at green entrepreneurship, which are an integral part of its daily operations and strategic planning. The company's business plan combines a positive environmental and social footprint with a commitment to efficiency and transparency in corporate governance.

As a leader in the energy sector, DEPA aims to be a strong regional energy company that will be a development pillar through investments in infrastructure and new technologies and will act as a guarantor of the smooth supply and operation of the market. A step towards this direction is the adoption of technologies aimed at simulating the electricity and gas markets, which facilitate the commercial activity of DEPA and forecast demand with a three-week timeframe.



**40%**  
discounts  
on the wholesale  
gas supply price



By its annual Sustainability Report published, the company aims to inform society as a whole, as well as stakeholders, about its initiatives, policies and ultimately the impact of its corporate activity, through an evaluation of its actions and activities in key pillars such as Society, Environment, Human Resources, the Market and Corporate Governance.

**Ioannis Papadopoulos**  
Chair of the BoD

**Konstantinos D. Xifaras**  
CEO

# Historical background

DEPA's history is inextricably linked to the energy developments that have taken place in Greece. Since its establishment in September 1988, it initiated the construction of the

**1990**

The agreement for the construction of the natural gas pipeline from the Greek-Bulgarian border to Attica is signed

**1995**

The construction of the high pressure main pipeline is completed, and the construction of low pressure networks begins

**1997**

- Start of commercial operation
- Acquisition of DEFA (Natural Gas Public Company)

**2001**

Establishment of EPA in Attica where DEPA holds 51% of its share capital - Commencement of operation of CNG filling station in Ano Liosia, Attica

**2004**

The Olympic flame is fueled with natural gas during the opening ceremony of the Athens Olympics

**2007**

- Completion of the construction of the Greece-Turkey interconnector.
- Greece becomes the first European country to supply Caspian Sea natural gas through the Turkish network
- Establishment of DESFA for the management of the National Natural Gas System and the LNG Transmission & Distribution System
- Merger of EDA of Attica, Thessaloniki and Thessaly into the "Gas Distribution Company (EDA) S.A.

**1994**

DEPA signs the first natural gas Sales Contract with DEI (PPC), the country's largest consumer

**1996**

- The supply of industrial customers
- The Gas Distribution Companies S.A. of Attica (EDA), Thessaloniki and Thessaly are established as 100% subsidiaries of DEPA
  - Completion of construction of branches

**2000**

- Establishment of the Thessaloniki and Thessaly Gas Supply Companies (EPA) where DEPA holds 51% of the share capital of each company
- Completion of the construction of the LNG facility in Revithoussa

**2003**

Signing of an interstate agreement between Greece and Turkey for the supply of natural gas

**2006**

Commencement of operation of a CNG filling station, in Anthoussa

**2008**

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

**2011**

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

**2012**

Start of Natural Gas Electronic Auctions



**fundamental infrastructure, dedicated to the transit of natural gas in our country. Since then, DEPA became synonymous with "natural gas" and its course evolves in parallel with the energy modernisation of Greece.**

#### • 2013

- Presentation of the CNG "FISIKON" for vehicle traffic in the Greek market and development of a network of service stations throughout Greece in cooperation with EKO and BP
- Signing of a 25-year agreement with the Azeri state-owned SOCAR and the Shah Deniz 2 Consortium for the supply of natural gas
- Start of development of the EastMed project by DEPA and its subsequent adoption by "IGI Poseidon"

#### 2015

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

#### 2018

DEPA contribution at a rate of 20% in the share capital of GASTRADE for the development and construction of the Project "Floating LNG Terminal of Northern Greece" in Alexandroupoli

#### 2020

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

#### 2014

- Signing of an agreement with GAZPROM EXPORT, to reduce the supply price and extend the current contract
- Agreement reached with GAZPROM EXPORT to reduce ToP deficit quantities and decrease the Maximum Annual Contractual Quantity
- Launch of POSEIDON MED II (1/6/2015) program with DEPA as coordinator

#### 2017

- Establishment of the Distribution Company for the Rest of Greece (DEDA)
- Signing of Cooperation Agreements between IGI Poseidon with Noble, Energean, INGL and TMNG to explore the joint further development of the EastMed project
- Launch of the European co-funded project BLUE-HUBS (the Grant Agreement was signed in 2018), with the participation of DEPA as coordinator

#### 2019

- Launch of the European co-funded SECUREGAS programme
- Launch of the European co-funded project CYNERGY
- Launch of the European co-funded SUPERGREEN programme

#### 2021

In January 2021, the Board of Directors of DEPA COMMERCIAL S.A. by its decision no. 1405/29.01.21 approved the acquisition by DEPA of 49% of the share capital of the company NORTH SOLAR S.A., which develops photovoltaic projects in Western Macedonia. This investment marks the entry of DEPA COMMERCIAL S.A. into RES.



## The company at a glance

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**Turnover**

**€ 1,417,142,117**

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**Total**

**187 employees**

**Employees:**

**(98 men, 89 women)**

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### **Business plan 2021-2025**

**The following key strategic axes of the Company remain:**

The transformation into an energy company with increased vertical integration

The maintenance of competitiveness Expanding the Company's activities abroad and leading the adoption of new activities

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**The Company supports the commitments of the country to adopt measures related to the achievement of targets in addressing climate change, adapting its strategy accordingly.**

## Company profile GRI 2-1, 2-6

The parent company DEPA COMMERCIAL S.A. (hereinafter "DEPA S.A." or "DEPA" or "DEPA Commercial" or "the Company") was established in Greece in 1988 as a state-owned societe anonyme for the purpose of introducing natural gas into the Greek energy market. DEPA Commercial operates in Greece for the transmission - distribution and sale of natural gas and electricity.

DEPA Commercial, from its establishment until today, is the leading natural gas import and supply company in Greece. It is the company that introduced natural

gas to Greece, making a major investment and as a consequence it changed the country's energy path. Since then, it has continued its successful course in the energy sector, always acting with a view to meeting the energy needs of our country through the uninterrupted supply of natural gas, protecting the environment, supporting the society and, of course, ensuring price competitiveness.

DEPA Commercial contributes substantially to the development of the Greek economy, the protection of the environment and the improvement of the

life quality of local communities. The Company has a strong presence in the wider energy sector, as it counts many years of experience. DEPA Commercial has created an **infrastructure network with an accounting value of more than €1.5 billion**, which connects the one end of the Greek territory to the other. More specifically it reaches from Thrace to Attica, all major energy consumption centres of the mainland. An **over 1,000 km of high pressure transmission network** and an **over 5,000 km of medium pressure distribution network** have been built in different regions, whereas an **extensive network of low pressure pipelines** has been built in at least six major urban areas. The liquefied natural gas (LNG) station at Revithoussa, which is connected via subsea pipelines to the main gas transmission system, and the 295 km long interconnecting pipeline from Turkey (Karatsabe) to Greece (Komotini) have been constructed.

The Company has entered into partnerships with major international companies, which have undertaken the expansion of distribution networks and the penetration of natural gas in areas with consumers of up to 10 million cubic meters per year.

The registered office of DEPA COMMERCIAL S.A. is located at 92, Marinou Antypa Street, 141 21, Heraklio, Attica.

## Activities of the company

GRI 2-1, 2-6

THE COMPANY'S MAIN COUNTRIES OF OPERATION ARE:  
GREECE - BULGARIA

**The main activities of DEPA Commercial include:**

01 the trade of natural gas

02 the supply of natural gas

03 the use of infrastructure and the secondary market

04 the supply and trade of electricity as well as Stock Exchange

# Shareholder structure GRI 2-1, 2-2

The structure of DEPA COMMERCIAL Group during the reporting period (1/1-31/12/2021) was as follows:

Parent Company: DEPA Commercial (DEPA) S.A. is 65% owned by the Hellenic Republic Asset Development Fund ("HRADF") and 35% owned by Hellenic Petroleum Societe Anonyme ("HELPE"). This Report concerns only the parent company and not its subsidiaries.

## Subsidiaries of DEPA COMMERCIAL S.A.:



100%

ATTICA GAS SUPPLY COMPANY - HELLENIC ENERGY SINGLE MEMBER SOCIETE ANONYME COMPANY (distinctive title "NATURAL GAS - HELLENIC ENERGY COMPANY") (100% shareholder of DEPA Commercial S.A.)



100%

DEPA INTERNATIONAL PROJECTS SOCIETE ANONYME (distinctive title "DEPA INTERNATIONAL PROJECTS S.A.") (100% shareholder of DEPA Commercial S.A.) (discontinued as of 19.01.2021 due to transfer of its shares to HRADF S.A. and HELPE S.A.)

## Jointly Controlled Entities (directly held by the company):



20%

GASTRADE S.A. NATURAL GAS CONSTRUCTION AND TECHNICAL SOCIETE ANONYME COMPANY (distinctive title "Gastrade S.A.") (20% shareholder of DEPA Commercial S.A.)



49%

NORTH SOLAR S.A. (49% shareholder of DEPA Commercial S.A.)



## Financial figures of the company

GRI 201-1

After 35 years of presence in the Greek market, DEPA Commercial is a dynamic company in the energy sector of Greece, supporting with determination and vision both the Greek economy and the protection of our natural environment as well as the improvement of the quality of life of society in general. The financial figures of the Company are presented in the table below:

### Financial figures of the company

Turnover	€ 1,417,142,117
Net Profits <sup>2</sup>	€ 260,267,265
Total number of DEPA Commercial Group Companies	3
Total number of employees	187
Total number of customers served <sup>3</sup>	123
Number of shares of the company	198,980

### Table of 2021 economic value

#### Value generated

Turnover <sup>4</sup>	€ 1,435,388,448
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#### Value allocated

Operating cost	€ 1,100,432,257
Income taxes and other taxes	€ 16,522,368
Payments to capital providers <sup>5</sup>	€ 6,641,952
Employee benefits	€ 3,143,726
Social Investment (CSR)	€ 533,221,88
Total economic value allocated	€ 1,127,273,524.88
Economic Value allocated %	79%
Economic Value retained %	21%

2. Earnings after taxes from ongoing and discontinued activities

3. All customer categories are included, except those served exclusively through auctions (gas release program)

4. For the calculation of the Economic Value Index, the business cycle includes dividend income as well as financial income/expenses

5. Concerns payable dividends





## Corporate fleet

The company has increased its corporate fleet in recent years from 30 leased vehicles in 2019 to 39 corporate vehicles in 2021, namely, an increase of 30%.

	2019	2020	2021
<b>Leased</b>	30	36	<b>39</b>
<b>Proprietary</b>	5	5	<b>5</b>

## Supply chain and related figures

GRI 2-6

GRI 204-1

The Company cooperates with the leading natural gas companies - suppliers around the world. The main natural gas supplies are secured until 2026 by Russia, through the state-owned company "GAZPROM EXPORT", and until 01.01.2022 by Turkey through the company BOTAS.

DEPA Commercial meets the internal demand for natural gas through LNG contracts on the open market and through exchange trading. This natural gas is imported by DEPA into the Greek market by pipeline through the National Natural Gas Transmission System, which is operated by DESFA. Liquefied natural gas (LNG) is mainly purchased from the Algerian state-owned company "SONATRACH", under a long-term contract for 21 years, which expired at the end of 2021 and was renewed until the end of 2022. On 19 September 2013, DEPA S.A. signed a long-term contract with the Azeri company SOCAR for the purchase and import of natural gas from the end of 2020 until 2044. This contract has already been fully assigned by SOCAR to Azerbaijan Gas Supply Company (AGSC), on the basis of a

tripartite agreement signed on 17 December 2013. In more detail, DEPA Commercial received for the reference year 2021 through transmission pipelines a total quantity of natural gas amounting approximately to 3.07 billion Nm<sup>3</sup>. Specifically, DEPA Commercial received from the supplier company BOTAS (Turkey) less than the minimum contractual quantity for the year and, thus, the latter failed to meet the delivery obligation, resulting in the application of the contractual clause on mandatory payment of quantities regardless of receipt (Take or Pay). The period of contractual deliveries with this company has been completed and in the period 2022 - 2023, DEPA Commercial will receive the compensatory quantities of the quantities not received during the contractual years 2019 to 2021.

In 2021, DEPA Commercial received quantities of liquefied natural gas (LNG) from GAZPROM EXPORT totaling 1.849 billion m<sup>3</sup>, from BOTAS a quantity of 0.39 billion m<sup>3</sup>, and from AGSC a quantity of 0.885 billion m<sup>3</sup>. Additionally, during

the same year, the company received from the supplier SONATRACH (Algeria) 12 cargoes of Liquefied Natural Gas (LNG) equivalent to approximately 0.50 billion Nm<sup>3</sup>. Finally, in 2021, DEPA Commercial procured LNG quantities from the spot market corresponding to approximately 0.06 billion Nm<sup>3</sup>. In 2021, DEPA Commercial continued to supply the National Natural Gas System Operator (DESFA) with LNG to balance the National Natural Gas Transmission

System (NNGTS) and with natural gas to compensate for Operating Gas, through tendering procedures. Since the beginning of 2021, DEPA Commercial has been registered and listed on the Italian Energy Exchange (Gestore dei Mercati Energetici-GME). During 2021, DEPA Commercial procured a total of 4.45 million Nm<sup>3</sup> of gas from the GME. During 2021, the Company completed the negotiation with SONATRACH on the annual extension of the

## Gas Supply for DEPA in 2021

<b>Sonatrach Algeria</b>	<b>0.50 billion Nm<sup>3</sup> of gas</b>
<b>Gestore dei Mercati Energetici-GME</b>	<b>4.45 million Nm<sup>3</sup> of gas</b>
<b>Spot purchase</b>	<b>0.06 billion Nm<sup>3</sup> of gas</b>
<b>Gazprom Export</b>	<b>1.849 billion Nm<sup>3</sup> of gas</b>
<b>Botas</b>	<b>0.39 billion Nm<sup>3</sup> of gas</b>
<b>AGSC</b>	<b>0.885 billion Nm<sup>3</sup> of gas</b>

contract for 2022 relating to the annual quantities and price. In addition, in 2021, the supplier Gazprom Export submitted to DEPA a request to revise the price of the contract between the two parties. The negotiation that followed was successful with the parties agreeing on the new price to be applied from 1 January 2022. It is worth mentioning that, in turn, DEPA Commercial is also a leading supplier of natural gas, both to industrial and domestic consumers and to the National Natural Gas System Operator

(DESFA), which it supplies with LNG for the balancing of the National Natural Gas Transmission System and with natural gas to compensate for Operating Gas, through tendering procedures.


Finally, it is important that DEPA Commercial also supports local suppliers and this is evidenced by the fact that for 2021, 6% of its expenditure was exclusively related to local suppliers. Local suppliers are defined as suppliers within the Greek territory.

# Customers

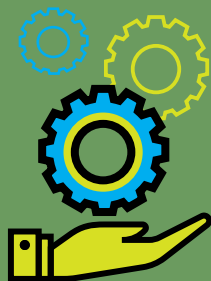
## Customer service and satisfaction

Because customers in the modern world have high expectations and seek professional and positive experiences, DEPA Commercial aims to provide efficient, fast, prompt and high quality service to its customers. Our main objective is to provide natural gas at competitive prices, as well as to develop and offer all types of new gas applications and services in order to meet the growing expectations of both industrial and domestic consumers.

We are committed to serving our customers, meeting their needs and providing flexibility in their choices by delivering gas directly, taking into account the regulatory framework and giving our customers the option of a stand-alone gas supply contract. A key tool for investigating customer satisfaction is surveys through relevant questionnaires, in order to identify any potential problems, improve our services and meet their expectations.



**We are committed to serving our customers, meeting their needs, and providing flexibility in their choices by delivering gas directly, taking into account the regulatory**

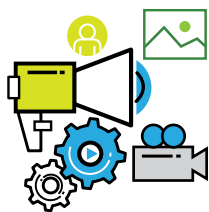


## Product and service Warranty

GRI 2-27

Although natural gas is not a product subject to labelling, we are in full compliance with the terms of our contracts and our obligations to our customers in matters that ensure its rational use as well as our customers' safety. Customers are fully informed about natural gas, its positive operation and potential problems that may occur and the Company guarantees that its services meet quality requirements. The competent Division in this respect is the Division of Gas Supply Activities. In the year 2021, there were no incidents of non-compliance related to any health and safety consequences on customers using our products and services.





## Responsible communication and marketing

Our constant goal is to communicate with our customers in a reliable, valid and honest way. Guided by the value of corporate credibility, we closely and strictly follow all relevant laws and voluntary codes for advertising and promotional actions, aiming to the proper promotion of our product and services, both in the Mass Media and in the Social Media, in order to implement a responsible communication strategy. In addition, our Company's Code of Business Conduct and Ethics refers to the consequences of unauthorised disclosure of information, such as damaging the Company's credibility and reputation. In particular, executives, employees or associates who plan to carry out speeches, presentations, interviews, articles, studies, etc., must obtain the approval of the Management, if they wish to represent DEPA and inform the Management, in order to receive relevant guidance and avoid expressing opinions or answering questions that do not fall within their area of expertise.

In 2021 there were no incidents of non-compliance with regulations or voluntary codes related to the Company's services or incidents related to marketing and advertising.

## Significant events in 2021



### Increase in natural gas sales GRI 203-1

The large increase in sales is mainly due to the significant increase in international prices which made the arrival of LNG cargoes from third parties unprofitable and led the majority of customers to purchase additional LNG from DEPA Commercial compared to their originally contracted volumes for 2021. The use of natural gas in electricity generation amounted to 48 TWh compared to 41 TWh in 2020, an increase of approximately 17%. The total quantities of natural gas injected into the NNGTS in 2021 amounted to 77.6 TWh (68.3% pipeline gas and 31.7% LNG) of which 7.6 TWh were exported to Bulgaria. Gas demand in the Greek market reached 70 TWh by volume in 2021 (historically the highest annual gas consumption), showing an increase of 10.9% compared to 2020 (63.1 TWh). DEPA Commercial's gas sales volume for 2021 amounted to 40 TWh, increased by 57% compared to the corresponding sales volume in 2020. This increase is justified by the particularly hot summer of 2021, the retirement of two lignite-fired power plants and the increase in electricity exports. These three factors led to record consumption of natural gas in the domestic market. This, in turn, led to an increase in the share of DEPA Commercial in the total quantities of natural gas imported into the country and, by extension, in the wholesale gas market, compared to 2020. The quantities of natural gas injected by DEPA Marketing into the NNGTS in 2021 amounted to 40.1 TWh (85% pipeline gas and 15% LNG).



## Mechanism for mitigating the increased cost of Natural Gas

In 2021, DEPA Commercial developed a mechanism to absorb part of the gas cost increases through which domestic consumers supplied with gas directly or indirectly (through third party Suppliers or Providers) received from DEPA Commercial discounts of 16% for the months of October and November and 40% for the month of December on the wholesale gas supply price. The cost of providing these aids/ discounts on behalf of the Company for this period of 2021 amounted to €55,36 million.

## Expansion of DEPA's renewable energy portfolio (RES)

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 and a member of the European Association of Hydrogen (Hydrogen Europe) and develops independent projects in alternative and cleaner fuels, building on its many years of experience in the natural gas market. These projects will target customers operating in road transport, power generation and industrial sectors.





## Digital transformation

**Digital transformation is a major step for companies that want to improve their performance and remain competitive in the digital age. Particularly after Covid-19, companies are required through digital transformation to integrate new technologies, improve their work procedures and practices, increase their effectiveness and efficiency through better time management and transform their analogue corporate culture into a new dynamic digitalised culture.**

In 2021, the use of an e-procurement platform - application was completed and fully operational, resulting in the automation of the relevant procedures, increase the speed of processing and, by extension, productivity, as well as direct information to all administrative levels of the Company. In addition, in cooperation with the Administrative Services, a project was carried out for the supply, configuration and installation of procurement procedure management and contract execution monitoring software. The part of the project regarding the procurement procedure management was completed and operational, significantly simplifying and speeding up this operational function. The part of the project regarding the contract execution monitoring is expected to be operational in 2022.

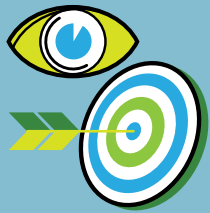
At the same time, electricity (LTSx) and natural gas (Atlas Gas) market simulation software was supplied and installed in order to simulate the electricity markets in a number of parameters for the benefit of DEPA Commercial's trading activities and to forecast the demand of DEPA Commercial's customers over a time horizon of up to three weeks in order to ensure optimal planning of natural gas supply and maximum satisfaction of customer demand.

In 2021, the Design and Redesign of sixty (60) existing procedures of the Company was completed in accordance with the international standard BPMN 2.0 (Business Procedure Model and Notation) and the use of the

"Aris Connect" IT system, which the Company purchased for the further development, revision and updating of all its procedures.

In cooperation with the Marketing Services, DEPA Commercial has started a project for the supply, configuration and installation of customer relationship management (CRM) software, which will be used to improve the management of the Company's customer base and especially, in the first phase, the process of attracting new customers.

The project concerns the organisational units of Customers and Markets and Gas Operations. Specifically, the software chosen after extensive market research is Microsoft Dynamics 365, which is one of the most prevalent software worldwide and also has the advantage of smooth integration with the rest of the Company's infrastructure based on Microsoft's 365 environment. The project is currently under construction and is expected to be operational within Q3 2022. The planning of the next actions, in the context of the digital transformation of the Commercial Services, concerns the gradual expansion of the use of CRM in all commercial management functions of the customer base.



## Vision and goals

Our vision: **"be a strong, regional energy company, offering services of high quality and innovation, contributing to the well-being of society"**.

DEPA is intertwined with the concept of energy to such an extent that referring to our Company

is automatically identified with the natural gas market in our country. Being aware of our key position in the domestic energy field and the responsibility that stems from it, we have set the following strategic objectives in order to remain a leader and a founder of developments in the energy sector:

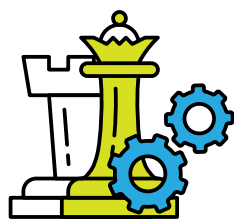
Maintaining our leading role in the liberalised, competitive domestic market

Taking advantage of the country's geographical position and energy potential for the creation and exploitation of development opportunities in Greece and the wider region

Increasing integration of natural gas in the Greek energy market

Maintaining and continuously improving a competitive and sufficiently diversified gas supply portfolio

Creating a modern and cost - effective organisation that will respond and adapt successfully to changing needs of the market and society and will seize future growth opportunities by continuously improving its services, respecting people, society and the environment



# Strategy and corporate development

The dominant strategy of the company is the expansion of its activities and its transformation from a natural gas company into an energy company that will provide a diverse series of energy products and services.

Within this framework, in the first half of 2021, the preparation of the **five-year Business Plan 2021-2025 of the Company was completed**. The company's key strategic axes remain:

- a the transformation from a gas company to an energy company with increased vertical integration,
- b the maintenance of its competitiveness in its core commercial activity,
- c the expansion of its activity outside the country,
- d the leadership in the adoption of new activities.

DEPA Commercial aims to **maximise** its value by optimising the performance of its core existing activities, as well as developing new activities:

**The wholesale activity** with the utilisation of the Natural Gas supply portfolio, with long-term supply contracts.

**The supply** and trading of electricity, listing on in Stock Markets.

**The development** of the retail customer base with the supply of natural gas and electricity through the subsidiary company "ATTICA GAS SUPPLY COMPANY - HELLENIC ENERGY SINGLE MEMBER SOCIETE ANONYME COMPANY".

**The new gas infrastructure** (FSRU in Alexandroupoli, FISIKON gas stations, initiatives for new uses of natural gas).

**Electricity generation** from Renewable Energy Sources.

**The development** of pilot applications for the use of renewable gaseous fuels (hydrogen, biomethane, etc.), as well as the exploration of the potential for the wider use of hydrogen as a means of energy production and storage.

# Use of infrastructure - Secondary market

During 2021, DEPA Commercial supplied 306.6 GWh through the DESFA Balancing Platform and procured 113.7 GWh. In addition to these and based on the provisions of the ESFA Management Code, DEPA Commercial during 2021 carried out other activities related to the secondary market, such as LNG and Storage Space transactions with Third-Party Users, allocations of Receipt and Delivery capacity, import of LNG loads with a Third-Party User of LNG, etc. In addition, DEPA Commercial was supplied by the GME (Italian energy exchange) and through the Italian Operator Snam Rete Gas as well as the TAP operator quantities of 52.2 GWh.

At the same time, DEPA Commercial, also acting as the User of the Distribution Networks, transported quantities to approximately 85 final consumers (mostly Industrial Units, as well as CNG stations and domestic customers), through the Distribution Networks of EDA Attica and EDA Thessaloniki, EDA Thessaly and DEDA. In accordance with the provisions of the ESFA Code, LNG auctions were held in October 2021 in two phases: LNG slots during Phase A of the LNG Auction and

Supplementary Capacity during Phase B of the LNG Auction. DEPA participated in the above Auctions by securing a total of 14 slots for the year 2022. At the same time, in 2021, the company registered in the Italian Natural Gas System (SNAM S.p.A) and through the PRISMA platform, participated in capacity commitment auctions both at the Greek Interconnection Points Nea Mesimvria and Kipi, and at the Italian Interconnection Point Melendugno.

In this context, it committed Continuous, Related and Competitive Capacity products and secured the desired capacities to service its Supply Contracts with AGSC, BOTAS and through GME. Finally, during 2021, **DEPA Commercial supplied customers in Bulgaria, through the Transmission network of the Bulgarian Operator BULGARTRANGAZ.**





# Electricity supply - trading and listing on stock markets

During 2021, the Company was registered in the Participants' Register of the Hellenic Energy Exchange S.A. (ENEX S.A.), in order to start trading electricity quantities for the purpose of electricity supply and trading. In this context, it concluded a relevant contract with the Energy Exchange Clearing House S.A. (EnExClear) for the clearing of the quantities of electricity negotiated, as well as a contract with a General Clearing Member for its participation in the markets of the EnEx. In addition, it entered into a contract with IPTO as the Operator of the HETS in order to be registered in the relevant Register of Participants. At the same time, a training programme was prepared for the staff of the relevant Unit on electricity supply and trading issues and the certification of the company's electricity negotiators was carried out following a relevant seminar and examinations held by the Hellenic Energy Exchange S.A. (ENEX S.A.).

Participations - partnerships			GRI 2-28
DEPA Commercial, as a leading company in the natural gas sector, is always at the heart of developments in this field. To this end, and in order to stay informed of all developments regarding energy issues, DEPA Commercial is a member of International and Greek Corporate Associations, groups of International Energy Bodies and Chambers of Commerce:			
EUROGAS	NGVA Europe	Institute for Energy of South East Europe (IENE)	
EUROPEAN FEDERATION OF ENERGY TRADERS (EFET)	GLOBAL GAS CENTRE	Athens Chamber of Commerce and Industry (ACCI)	
INTERNATIONAL GAS UNION (IGU)	Eastern Mediterranean Gas Forum-Gas Industry Advisory Committee		
HYDROGEN EUROPE	Hellenic Federation of Enterprises and Industries (SEV)	Hellenic Association for Energy Economics (HAEE)	

Participation in the above bodies and especially in the energy forums, is considered necessary in order to directly assess the impact of the European regulatory framework under development on the commercial operation of gas companies and to promote the Company's strategic interests. In addition, as part of this participation, the Company has an active role in the development of the gas trading hub in the Greek market in order to enhance liquidity.



## 2021 Awards

DEPA Commercial continues its tradition of excellence for the year 2021, as it was awarded by ICAP CRIF as a TRUE LEADER among 30,000 candidate companies examined and was rated at A2 ICAP CRIF SCORE, ranking 11th among the groups with 338.4 million euros. EBITDA based on measurable criteria with published results. DEPA Commercial's very high ICAP CRIF SCORE, which places it in the A2 scale, reflecting a very high creditworthiness, proves beyond any doubt that the Company is at the highest levels of rating.

In addition, the Company was awarded for its social solidarity with an honorary plaque at the 9th Local Government Awards, which was received by the President Mr. Giannis Papadopoulos and the CEO Mr. Konstantinos Xifaras, who were warmly congratulated, on behalf of the Company, for the critical actions of DEPA Commercial to mitigate the socio-economic impact of the energy crisis. This award was a recognition and reward for the way in which our Company managed the frenzied increases in gas prices and protected Greek households by providing discounts and horizontal subsidies amounting to €170 million.

# Financial risk management

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

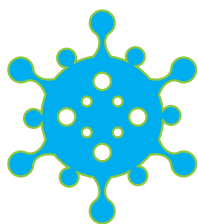
## Macroeconomic Environment

Although during 2021 the Greek economy recovered from the recession of 2020 caused by the pandemic and the measures taken to limit the impact on the health system, it continued to face significant difficulties. In the short term, the main difficulty is to contain the pandemic and return to stable growth. Despite these uncertainties, Greece's real GDP in 2021 was higher than expected. The lifting of movement restrictions contributed economic recovery, enhancing the economic climate

and international trade. High vaccination rates weakened the pandemic's dynamics and encouraged international travel and extended the tourist season until November, which resulted in an 8.3% increase in GDP (2020: -9%).

A close-up photograph of a person's hand, wearing a blue sleeve, placing a light-colored wooden block onto a row of other similar blocks on a rustic wooden surface. The blocks are arranged in a slightly curved line, and the hand is positioned to add another block to the end of the row. The background is a blurred wooden surface.

The Group's related risk management policies aim to minimise the negative effects these risks may have on the Group's financial position and performance.



## Covid-19

Although the Greek economy continued to be affected by the Covid-19 developments, it recovered in 2021 due to increased domestic demand and a tourist season which was better than expected. The recovery has been facilitated by the gradual lifting of the strict measures imposed and the development of vaccination programmes, which have already helped to reduce the incidence of new variants of the virus. Although economic growth is expected to continue in 2022, albeit at a lower rate, the characteristics of the new Omicron mutations could have a negative impact on economic growth and overall business activities. A further "surge" in Covid-19 infections increases as well as a slowdown in the pace of vaccination could lead to further restrictive measures, which would negatively affect current growth projections and hinder progress.

## 1. Market risk

### Interest rate risk

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

### Exchange rate risk

The Group faces an exchange rate risk arising from the shift 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 31/12/2021, 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 11,717 thousand Euros and correspondingly the after-tax results of the parent company and the Group for the closing year would have been increased by the amount of 9,139 thousand Euros, 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 14,321 thousand Euro and correspondingly the after-tax results of the parent company and the Group for the fiscal year ended would appear reduced by the amount of 11,170 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 shifts in the prices of competing natural gas products as its costs are affected by fluctuations in the prices of oil and natural gas in European hubs (TTF, PSV) and the spot market. The Group formulates its pricing policy based on the supply price of natural gas. DEPA Commercial used derivatives for the first time in 2021 to hedge the risk arising from the price fluctuation in the natural gas it trades.

## 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. Credit to customers is in accordance with the credit policy of the Company and the Group, while in case of failure to meet the payment deadlines, interest is charged to the customers. During the fiscal year ended 31 December 2021, 47.49% (2020: 55.44%) of the Company's turnover comes from the Public Power Corporation S.A., 9.11% (2020: 11.47%) by Elpedison Energy S.A. and 8.89% (2020: 5.63%) from EPA ATTIKIS S.A. respectively.

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 fiscal year, the credit risk is covered by the collateral and the provisions deemed necessary at that given 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 recognised 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 handled through the availability of sufficient cash reserves and credit lines with partner banks. The existing available approved bank credits to the Group are sufficient to meet any potential cash shortfall.

### 4. Regulatory risk



Possible amendments to the regulatory and legislative framework governing the natural gas market, such as the implementation of the provisions of European legislation, the

implementation of obligations under the Enhanced Surveillance Framework for Greece and the decisions of the Energy Regulatory Authority regarding the general regulation and operation of the Greek energy market, as well as possible restructuring or other changes in the Group's activities as a result of compliance with the regulatory framework, may have a significant impact on the operation, financial condition, operating income and liquidity of the Group and the Company.



# DEPA Commercial and the sustainable development goals of the United Nations

In 2015, the United Nations adopted the 2030 Agenda, which is a universal agreement that DEPA Commercial is committed to support with all its decisions and activities from now on.

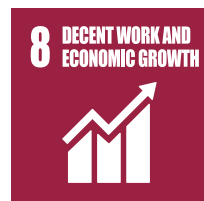
In this context, our contribution to the 17 Goals is undeniable, especially those directly related to our activities and primarily to Goal 7: "Affordable and Clean Energy for All".The table below reflects our contribution and our practical commitment to the Sustainable Development Goals for 2021:

Sustainable Development Goal	Our response
	We support vulnerable groups.
	We care for the health and safety of our employees.
	We continuously invest in the training of our employees, while we systematically implement actions to inform society.
	We provide equal opportunities to all our employees and promote gender equality.

## Sustainable Development Goal Our response



We ensure the rational use of energy, as well as the adoption of technologies aimed at reducing greenhouse gas emissions.



We respect diversity by taking steps to avoid any form of discrimination in the workplace and in the selection of our employees.



We measure our carbon footprint in order to determine actions to reduce it.



We take all necessary measures to minimise the environmental impact of our operations, while at the same time we take care to protect biodiversity in the areas where we operate.



We operate with integrity, developing rules of conduct and procedures that promote transparency, anti-corruption, and compliance with all regulations and laws regarding the protection of our customers' privacy.

# Taxonomy reference

Taking into account the new strategic roadmap of the European Union, which calls for the shift of society, economy and procedures to new "sustainable paths", i.e. the European Green Deal and the European Climate Law, DEPA Commercial is adapting its strategic planning based on the new data and needs that arise at a global level.

The European Regulation (EU) 2020/852 establishing a framework to facilitate sustainable investment, creates a "green" system for classifying economic activities that, in order to qualify as "environmentally sustainable", must: on the one hand, significantly contribute to at least one of the six climate-environmental objectives it sets (e.g. climate crisis mitigation, transition to a circular economy, protection and restoration of biodiversity and ecosystems, etc.) and, on the other hand, not significantly burden any of the objectives in question (Do No Significant Harm (DNSH)). In addition, they must provide certain minimum social guarantees recognised in International Conventions and which can be assessed on the basis of specific technical criteria to be established by delegated acts of the European Commission.

DEPA Commercial, while 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 viability 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 make green, environmentally sustainable investments, which will be in line with the provisions of the abovementioned Taxonomy Regulation and will also contribute to sustainable development both domestically and in the European Union.

# About the Sustainable Development Report

DEPA Commercial is publishing its second consecutive Sustainable Development Report, with 2021 being the reference year, in an attempt to communicate to all stakeholders in a transparent and accurate manner, its performance, initiatives and actions on issues related to the environment, society and corporate governance (ESG) and sustainable development in general. By recording its performance and initiatives on these issues, DEPA Commercial actively expresses its intention to contribute to the achievement of the UN Sustainable Development Goals, aiming to build long-term relationships with its stakeholders in order to provide them with added value and leave a positive legacy in its field of activity.

# Reference scope and time period covered by the report

GRI 2-2

GRI 2-3

GRI 2-4

With the Sustainability Report for 2021, the Company reflects in a transparent and comparable manner its actions on Environmental, Social and Corporate Governance (ESG) issues for the period from 1/1/2021 to 31/12/2021. The Sustainable Development Report covers the same period as the company's financial statements for 2021. The financial statements present the financial results of the Group, while the Sustainable Development Report presents only the data related to the parent company DEPA Commercial S.A.

For further information please see:  
<https://depa.gr/wp-content/uploads/2022/07/oikonomikes-katastaseis-omiloy-mitrikis-31.12.2021.pdf>

The Report is prepared on an annual basis.

The Report has been prepared under the Directive 2014/95/EU, the European Commission's Green Paper and the 10 principles of the United Nations Global Compact.

DEPA Commercial's Sustainable Development Report for the year 2021 has been prepared in accordance with the internationally recognised Global Reporting Initiative (GRI Standards 2021).

GRI (general disclosure indices) are different from last year's due to the new revised GRI Standards 2021.

This Report has not received external assurance.

## Contact GRI 2-3

For further information and clarifications regarding the content of this Report or for any comments or questions regarding it, please contact our Corporate Social Responsibility team.

Address:

**92, Marinou Antipa str.,  
Heraklion Attiki GR 141 21  
T: 210 2701105,  
E-mail: [eke@depa.gr](mailto:eke@depa.gr).**

## Stakeholders

**GRI 2-29**

**GRI 2-12**

All those who directly or indirectly affect the operation of DEPA Commercial, as well as those affected by its business activities, are recognised as Stakeholders. Our Stakeholders are evaluated and redetermined periodically 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 procedure with an impact on the operation, strategy development and decision-making procedure of the Company, while at the same time it is the foundation of the relationships of trust between the parties involved. Through dialogue, Stakeholders can identify and assess the most significant impacts of the Company's operations presently or in the future on the environment, society (including human rights) and the economy. The Stakeholder groups are:

- **the Employees**
- **Clients**
- **Shareholders**
- **Suppliers**
- **the Regulatory Authority for Energy (RAE) and other Regulatory Authorities**
- **Subsidiaries**
- **Business Partners (or potential Partners) of DEPA**
- **the Government and the individual Ministries**
- **the Media**
- **Local community**
- **Social Bodies**

For the company, continuous consultation with stakeholders is of paramount importance in order to build trust and transparency.

The table below lists the company's stakeholder groups, the means and frequency of communication with them. The company is interested in effective communication and ensures that the methods and means of communication are always understandable and easy to use for all stakeholders.

Stakeholders	Means of Communication	Frequency of Communication
Employees / Union of Employees	Intra-company networks (Intranet, HR portal)	Any matter that needs to be settled
Customers Power generation Industry Commercial customers, Domestic consumers	Group meetings or teleconferences, annual consultations, website, social media, newsletter	On a regular basis, according to the needs
Shareholders	Targeted meetings, annual general meeting	On a regular basis, according to the needs and size of the project
Subsidiaries and Business Partners (or potential Partners) of DEPA	Written communication (e-mail), telephone communication, interpersonal communication with implementation of meetings	Daily, according to the needs of the projects
Government and Ministries	Annual meeting	On a regular basis, according to the needs and size of the project



Stakeholders	Means of Communication	Frequency of Communication
Subsidiaries and Business Partners (or potential Partners) of DEPA	Meetings, electronic communication via email, teleconferences, correspondence	On a daily and regular basis
Government and Ministries	Telephone and written communication (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 community	Telephone and written communication (email, fax, letters, etc.)	Whenever necessary
Social Bodies	Telephone and written communication (email, fax, letters, etc.), website, social media platforms, newsletters	On a regular basis and whenever necessary

# Materiality Analysis

GRI 2-4

GRI 2-12

GRI 2-14

GRI 3-1

GRI 3-2

GRI 3-3

The Materiality Analysis procedure is a basic tool for the responsible operation of the company, while it contributes to the effective formulation of the strategy for Sustainable Development. It is a dynamic procedure which is constantly evolving. At the same time, the Company's open dialogue with its stakeholder groups feeds this procedure with new data annually.

The company conducted the materiality analysis exercise to identify and prioritise the positive and negative impacts (actual and potential) of the company's activities on the environment, society (including human rights) and the economy. The selection of these impacts helped to identify the material topics.

**The materiality analysis was carried out in accordance with the new revised GRI Standards 2021 and followed the 4 steps provided within this procedure:**

## 1. Perception of the business environment

We reviewed and analyzed the company's internal policies, procedures and practices, as well as domestic and international trends regarding sustainable development, including the market and its expectations, regulatory and supervisory provisions related to the company, internationally recognised sustainable development standards (e.g. GRI, SASB, etc.), ESG assessment bodies (e.g. MSCI), the matters assessed as material in the previous report, examination of companies active in the same business sector.

## 2. Identification of effects

Recognition of the company's effects as a result of its business activity.

## 3. Assessment of the significance of the effects

The company conducted a materiality analysis survey through the development of a questionnaire distributed to stakeholders who identified the most significant effects of the company's operations. At the same time, the company's Board of Directors also recognised and evaluated the effects of the company's operations in order to determine the material topics. We evaluated the true positive and negative effects based on range, scale, and probability. Especially for the negative effects, we also assessed the potential for remediation.

## 4. Prioritisation of effects

After reviewing the assessment of effects, senior management concluded and validated the material topics and thus determined the content of the Report. The list of material topics is presented below:

<b>ENERGY MANAGEMENT AND GREENHOUSE GAS EMISSIONS</b>
<b>ADAPTATION TO CLIMATE CHANGE &amp; TRANSITION TO CLEAN ENERGY</b>
<b>WASTE MANAGEMENT</b>
<b>WATER MANAGEMENT</b>
<b>EMERGENCY PLANS AND OCCUPATIONAL HEALTH AND SAFETY</b>
<b>WORKING PRACTICES</b>
<b>RESPECT FOR HUMAN RIGHTS &amp; EQUAL OPPORTUNITIES</b>
<b>RELATIONS WITH SOCIETY</b>
<b>FIGHT AGAINST CORRUPTION AND BRIBERY</b>
<b>TRANSPARENCY AND LEGISLATIVE COMPLIANCE</b>

The material topics are presented above based on the assessment of their effects by the Company's senior management.

These material topics formed the basis for the definition of the content of the Report.





We note that with regard to negative effects, emphasis was placed on the impact that potential omissions or incorrect application of the policies and procedures developed by the company would have on the environment, the economy, people (including human rights).

# Positive Effect Issues (existing or potential)<sup>6</sup>

ENERGY MANAGEMENT AND GREENHOUSE GAS EMISSIONS	<div>9</div> <div>INDUSTRY INNOVATION AND INFRASTRUCTURE</div> <div></div>	<div>13</div> <div>CLIMATE ACTION</div> <div></div>		
ADAPTATION TO CLIMATE CHANGE & TRANSITION TO CLEAN ENERGY	<div>7</div> <div>AFFORDABLE AND CLEAN ENERGY</div> <div></div>	<div>9</div> <div>INDUSTRY INNOVATION AND INFRASTRUCTURE</div> <div></div>	<div>13</div> <div>CLIMATE ACTION</div> <div></div>	<div>15</div> <div>LIFE ON LAND</div> <div></div>
WASTE MANAGEMENT	<div>13</div> <div>CLIMATE ACTION</div> <div></div>			
WORKING PRACTICES	<div>4</div> <div>QUALITY EDUCATION</div> <div></div>	<div>5</div> <div>GENDER EQUALITY</div> <div></div>		
EMERGENCY PLANS AND OCCUPATIONAL HEALTH AND SAFETY	<div>3</div> <div>GOOD HEALTH AND WELL-BEING</div> <div></div>			
RESPECT FOR HUMAN RIGHTS & EQUAL OPPORTUNITIES	<div>5</div> <div>GENDER EQUALITY</div> <div></div>	<div>8</div> <div>DECENT WORK AND ECONOMIC GROWTH</div> <div></div>		
RELATIONS WITH SOCIETY	<div>1</div> <div>NO POVERTY</div> <div></div>	<div>16</div> <div>PEACE, JUSTICE AND STRONG INSTITUTIONS</div> <div></div>		
FIGHT AGAINST CORRUPTION AND BRIBERY	<div>16</div> <div>PEACE, JUSTICE AND STRONG INSTITUTIONS</div> <div></div>			
TRANSPARENCY AND LEGISLATIVE COMPLIANCE	<div>16</div> <div>PEACE, JUSTICE AND STRONG INSTITUTIONS</div> <div></div>			

<sup>6</sup> Implies that the company could cause or contribute to negative impacts through its activities, and/or the impacts are or could be directly related to its operations through business relationships, even if the company has not contributed to them

# Negative effect issues (existing or potential)

ENERGY MANAGEMENT AND GREENHOUSE GAS EMISSIONS	<div>13 CLIMATE ACTION</div> 
WATER MANAGEMENT	<div>13 CLIMATE ACTION</div> 
EMERGENCY PLANS AND OCCUPATIONAL HEALTH & SAFETY	<div>3 GOOD HEALTH AND WELL-BEING</div> 
TRANSPARENCY AND LEGISLATIVE COMPLIANCE	<div>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</div> 

In relation to the material topics for 2020, minor changes are presented resulting from the consolidation of some of the material topics of the 2020 Sustainability Report in order to more fully reflect our relevant effects. In particular, the substantive issue of Environmental Impact has been integrated into the new material topic of Climate Change.

Adaptation and Clean Energy Transition. Last year's material topics of Employment and Training of Workers merged into the material topic of Labour Practices. We did not identify any other relevant differences from last year's material topics.



# Environment





# Environment

**DEPA Commercial stands for energy, as in modern reality no human activity can function without an uninterrupted energy supply. At DEPA Commercial, we are committed to ensuring that the energy we supply is provided in a seamless manner and at competitive prices without causing adverse effects on the natural environment. Environmental protection is an indispensable necessity for achieving sustainable development. At DEPA Commercial, it is our firm and non-negotiable commitment that the efficiency and growth of the Company should be combined with the minimisation of our environmental footprint.**

Our Company's absolute priority is, on the one hand, the compliance with the environmental standards

provided for by both Greek and European legislation and, on the other hand, the commitment to the minimisation of our impact on the environment, providing the necessary resources for this purpose.

DEPA's commitment to environmental protection is expressed through the company's daily practices. Respect for the environment is translated into action through our carefully designed and coherent Environmental Policy. For its implementation, the Company applies an Environmental Management System that adopts and combines international

standards of environmental protection and modern Sustainable Development practices.

Within the framework of this System, DEPA ensures that every operational action relating to the environment complies with the requirements of national and European legislation. In addition, under this System, it takes actions that reduce the environmental impact of its activities and is able to set targets to improve its environmental performance.

Also, the Company's non-negotiable commitment

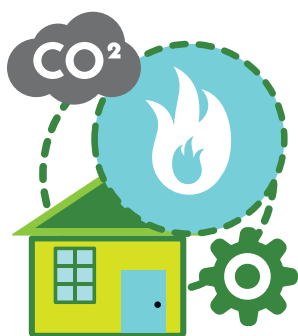
Respect for the environment is translated into action through our carefully designed and coherent Environmental Policy.

is to minimise the consequences on the natural resources, the atmosphere and the life quality of the residents, wherever it operates. Therefore, both during construction and operation of our facilities, our Company applies the strictest environmental standards provided for by the 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 specialised organizations. Furthermore, DEPA Commercial actively participates in research and development activities with a view to protecting and upgrading the environment. Within the framework of its Corporate Social Responsibility programmes, the company participates in various initiatives and programmes aimed at raising awareness of environmental issues in society. 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. DEPA Commercial has linked Responsible Business Conduct with sustainable business success and, thus, has managed to instill the value of environmental protection in its employees, always with a view to ensuring a sustainable reality for both present and future generations of our planet.

The climate crisis has been proven to adversely



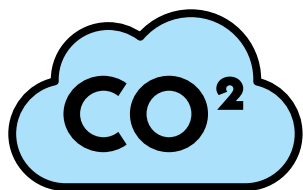


## Energy management and greenhouse gas emissions

GRI 3-3

affect life on our planet. For this reason, at DEPA Commercial, systematic monitoring and transparent recording of the greenhouse gas emissions (CO<sub>2</sub>, etc.) that are inevitably created during our activities is a non-negotiable commitment. Our constant objective has been and continues to be the reduction of greenhouse gas emissions with emphasis on carbon dioxide (CO<sub>2</sub>), always guided by our contribution to the targets set at European level (55% reduction of greenhouse gas emissions by 2030 and achievement of climate neutrality by 2050) and by extension at national level (revised National Plan for Energy and Climate (NECC)). In doing so, we are committed to environmental responsibility and to contribution to the mitigation of climate change.

In particular, the company's environmental practices include the systematic measurement of both energy consumption in our facilities and greenhouse gas emissions released into the atmosphere.



## Greenhouse gas emissions

GRI 305-1

GRI 305-2

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 2021, DEPA Commercial cleared and distributed 17,377,559.8 kg of CNG with a net emissions intensity of 69.3g CO<sub>2</sub>eq/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.

With regard to greenhouse gas emissions and in particular CO<sub>2</sub> and CO<sub>2</sub>e (carbon dioxide equivalents) emissions, DEPA Commercial monitors and systematically collects both direct emissions (Scope 1) and indirect emissions (Scope 2) for its needs. The following summary table includes precise data on each



Scope 1 (CO <sub>2</sub> e kg)		350.821,44
1.1	Direct emissions from stationary combustion	0,00
1.2	Direct emissions from mobile combustion	78,861,16
1.3	Direct process emissions and removals from industrial processes	-
1.4	Direct fugitive emissions from the release of GHGs in anthropogenic systems.	271,960,28
1.5	Direct emissions and removals from land use, land use change and forestry (LULUCF)	0,00

Scope 2 (CO <sub>2</sub> e kg)		2.075.489,27
2.1	Indirect emissions from imported electricity, including GHG emissions related to the production and consumption of electricity imported by the organization	2,075,489,27
2.2	Indirect emissions from imported energy, including GHG emissions related to the production of energy consumed by the organization through a physical network (steam, heating, cooling and compressed air), excluding electricity.	0,00

source of greenhouse gas emissions into the atmosphere, both directly, i.e. through air pollutants resulting from activities within the company's facilities, and indirectly through the consumption of electricity received from a third party.

In total, direct emissions (Scope 1) for 2021 were estimated at 350.8 tonnes of CO<sub>2</sub>e, while indirect emissions (Scope 2) for the same year were estimated at 2,075.5 tonnes of CO<sub>2</sub>e. In aggregate, our emissions (scope 1 and scope 2) for 2021 amounted to 2,426.31 tn CO<sub>2</sub>e.

The above greenhouse gas emissions include the emissions from the Natural Gas Bus Refueling Stations (SALFAs)

It should be noted that DEPA Commercial does not yet count indirect greenhouse gas emissions that may result from upstream or downstream activities that are not under its control (Scope 3).

By measuring our carbon footprint accurately and capturing it with the required transparency, we achieve the necessary oversight of the greenhouse gas emissions emitted by our activities, while being in an advantageous position to take measures and initiatives to minimise our carbon footprint. In this way, we remain true to our commitment to environmental protection and our vision of reversing the climate crisis.



## Emission intensity index GRI 305-4

The intensity index for scope 1 and scope 2 is calculated below based on the company's revenues for the year 2021:

**Scope 1: 350.8 tnCO<sub>2</sub>e / Turnover 1,417,142,117 € = 0.000247 tnCO<sub>2</sub>e/€**

**Scope 2: 2,075.5 tnCO<sub>2</sub>e. / Turnover 1,417,142,117 € = 0.00146 tnCO<sub>2</sub>e/€**

## Energy consumption GRI 302-1 GRI 302-2

The rational management of energy is a priority and a clear target for DEPA Commercial, which reflects its unstoppable effort to set a positive example in a particular sector, that of energy.

As part of the implementation of the Energy Management System (EMS), the company systematically monitors and records its energy consumption and implements energy saving actions. Total energy consumption in 2021 in the company amounted to 2,740.05 MWh (or 235.6 toe) and presented a 10% reduction compared to 2020 when it was 3,042.33 MWh (or 261.59 toe).

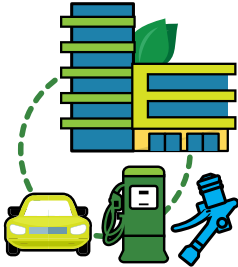
Total energy consumption was mainly due to electricity consumption, which amounted to 2,380.63 MWh (204.7 toe) and presented a 13% reduction compared to 2020 which was 2,745.63 MWh (toe).

In 2021 the total energy consumption from the use of Natural Gas (271.33 MWh) and petrol (88.09 MWh) from the company's vehicles increased by 21% compared to 2020, as the vehicle fleet increased, while the ratio of NG kg/petrol It increased by 93%. The electricity consumed in 2021 represents 87% of the total energy consumed, while the remaining 13% is vehicle fuel.



In 2021 the 2nd Energy Audit commenced, which will be completed and submitted to the Ministry of Environment in 2022. The energy audit will develop a new baseline period in 2021 and examine the savings achieved in relation to the previous energy audit.

For the reference year, the company did not produce or consume any energy from renewable sources.

<div>  <div> <b>Energy consumption within DEPA Commercial S.A. for the year 2021 By Type of Energy Product (in MWh)</b> </div> </div>	
Electricity consumption for DEPA Management Building	490,43 MWh
Electricity consumption for SALFA in Ano Liosia	1,329,88 MWh
Electricity consumption for SALFA in Anthoussa	560,32 MWh
<b>Total Electricity Consumption</b>	<b>2,380,63 MWh</b>
Petrol in Vehicles	88,09 MWh
Natural Gas in Vehicles	271,33 MWh
<b>Total Energy Consumption</b>	<b>2,740,05 MWh</b>

Based on the above table, it can be concluded that the largest share of energy consumption (electricity) comes from the two SALFA plants, which account for **79.39%** of the total electricity consumption within the organisation. It is noted that compared to 2020, there is a significant reduction in energy consumption of **15.95%** at the SALFA plants (**2020 - 2,249 MWh**), while compared to 2019 (**2019 - 2,298 MWh**)

the reduction was even more evident, reaching 17.74%. In addition, a reduction in energy consumption was also achieved at the company's head office, where it dropped from **497 MWh in 2020 to 490.43 MWh in 2021**.

The energy consumed outside DEPA Commercial, i.e. at the level of the company's own gas sales stations, amounted to **1,890.20 MWh** for 2021.

**Energy consumption**  
outside DEPA  
Commercial S.A. for  
the year 2021 at the  
fuel stations

**1,890.20  
MWh<sup>7</sup>**

## Energy Intensity Index

GRI 302-3

The energy requirements for the company's operations are realised through the monitoring of Energy Performance Index (EnPIs-Energy Performance Index). For the Management Building the EnPIs recorded are:

- a) MWh of electricity per m<sup>2</sup> of air-conditioned building area (EnPI1) and
- b) MWh of electricity per person (EnPI2).

In particular, the EnPI1 index from 158.2 KWh in 2020 decreased to 156.13 KWh in 2021 (minimal change) and consequently EnPI2 also showed a small change from 3.7 MWh/person to 3.38 MW/person. The energy requirements in each of the two SALFAs are reported in MWh of electricity per kg of compressed NG produced (EnPI3 index). More specifically, the EnPI3 cumulatively for both SALFAs presented a 2.3% decrease in 2021 (from 0.261 MWh/kg in 2020 to 0.255 MWh/kg F.A. in 2021).

Also, the energy requirements of vehicle fuel are reported in MWh of fuel per vehicle, MWh of fuel per 100Km (EnPI4 index) and in kg of consumed NG per litre of consumed petrol (EnPI5 index). Therefore, regarding vehicles, EnPI4 increased by 21% in 2021 (from 0.060 MWh/100Km in 2020 to 0.073 MWh/100Km in 2021), while EnPI5, which reflects the relationship between NG and petrol consumption in company vehicles, increased significantly by 93% (from 1.062 kg/lit in 2020 to 2.053 kg/lit in 2021).

As for the energy intensity index for the year 2021, it stands at 0.22 MWh/million € and reflects a decrease of 16% compared to 2020 (0.26 MWh/million €). The company's main objective remains the reduction of its energy needs in relation to its activities in the coming years, through strategic initiatives (expansion of the portfolio in renewable energy investment schemes) and measures that will bring the desired energy savings (e.g. change of energy-intensive equipment, awareness of human resources on the issue of saving energy resources, etc.) both at the level of our organisation's direct energy consumption and at the level of indirect consumption from upstream and downstream activities carried out by our company.

<sup>7</sup> Quantities are based on the accounts of each gas station of the Public Power Corporation (DEI) and the agreed-upon percentage that DEPA Commercial SA undertakes to pay



# Climate change adaptation and transition to clean energy

GRI 3-3

The climate crisis is bringing about rapid changes in the type of energy that should be used in the future. The energy of the future will be "green" and non-polluting for our planet. Driven by this shift to clean/sustainable energy forms in mind, DEPA Commercial's strategy incorporates both the European target for climate neutrality by 2050 (European Green Deal) and the Greek initiatives to decarbonise the national energy system (National Plan for Energy and Climate (NPEC)). Moreover, it is committed to continue to be the main guarantor of the country's energy security in natural gas, thanks to the long-term contracts it has signed with leading international suppliers (Gazprom Export/Russia, Botas/Turkey, Sonatrach/Algeria, etc.). At the same time, it is continuously expanding the use of natural gas (the most environmentally friendly fuel after Renewable Energy Sources) throughout the country and now, our company is heading towards the diversification and expansion of its portfolio through investments in Renewable Energy Sources (RES), thus inaugurating a new even greener era for DEPA Commercial SA.

Based on the foregoing, we are committed to prioritise the fight against climate change, helping through our activities to transition to the use of clean and mild forms of energy, which will have a positive impact on the climate and people's health.

## CNG mode

At DEPA Commercial we know the benefits of using natural gas better than anyone. Since 1988, when our corporate journey began, we have managed to distribute natural gas throughout Greece, even to the most remote parts of the country. For us, energy security, energy transition and eradication of energy poverty are the foundations of our operation. Regarding gas mode in Greece (one of the cleanest and most economical ways of driving), DEPA Commercial is implementing an ambitious plan to develop a core network of Compressed Natural Gas (CNG) stations located in or near major urban centres along the axis connecting the cities of Thessaloniki and Athens, within existing retail fuel stations. In this way, it is methodically developing the infrastructure to ensure that gas mode will soon reach every corner of the country.

At the same time, the company is further developing gas mode by expanding its nationwide

network of FISIKON CNG stations, spreading the benefits of gas mode to more drivers and regions of the country.

For example, during 2021, eighteen (18) CNG retail stations were in operation, under the FISIKON brand, within service stations bearing brands of HELPE Group as and other oil trading companies for the refuelling of commercial and passenger vehicles, in Attica, Thessaloniki, Larissa, Volos, Ioannina, Kozani, Lamia, and in the Motorway Service Areas of Evangelismos and Psathopyrgos. The total number of "FISIKON" CNG stations including DEPA Commercial's stations in Anthousa and Ano Liosia was 20 at the end of 2021.

Through the FISIKON network of retail stations, annual sales of 11 million kg of CNG were achieved, with an increase in sales volume of approximately 47% compared to the previous year, a remarkable

fact which is partly explained by the lifting of the restrictions imposed on travel due to the Covid-19 pandemic. The company's Division of Gas Mode and Remote CNG & LNG Customers carried out a detailed safety study at the Natural Gas Refuelling Stations for Buses (SALFAs) in cooperation with a recognised house.

The study included the reconduct of a risk assessment again, a HAZOP/HAZID study, an ATEX study and the revision of the Emergency Manual of each station. The purpose of the study was to determine the level of safety in the operation of the plant and the mechanical equipment. The conclusions of the study showed that "the level of plant safety is very high with

very low (and, above all, fully acceptable) levels of risk" and that "the existing level of plant automation is at such a high level that it allows the direct application of remote control for all operations within the production facilities".



## Innovations in the energy sector GRI 203-1

At DEPA Commercial, innovation has been a driving force within us since our establishment in 1988, as we were the first company to introduce natural gas in Greece and built the basic infrastructure for its transit from scratch, which was extremely groundbreaking for its time. Since then, natural gas has reached the most remote areas of Greece where our industrial and domestic customers are located, while we continue to innovate by adopting smart technologies (such as Compressed Natural Gas (CNG) and Liquefied Natural Gas (LNG)), thus contributing to the reduction of energy poverty and the transformation of Greece into a major regional energy hub in the wider Balkan and South-Eastern European region.

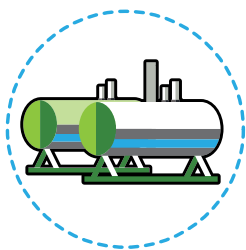
Indicatively, the following programmes are examples of the modernised development program being realised within DEPA Commercial:

- **CYnergy:** The CYnergy programme is a holistic approach to ending Cyprus' energy isolation through LNG/NG supply chain planning and market establishment, developing important synergies between the Energy and Transport sectors. The programme aims to lay the foundations for the green development of Cyprus and its transformation into an energy hub in the Eastern Mediterranean region, aiming to provide cleaner and cheaper energy for Industry, Transport and Domestic Consumers.
- **Poseidon Med II:** The Poseidon Med II project is the roadmap for the widespread adoption of LNG as a safe, environmentally friendly and sustainable alternative fuel for shipping, leading maritime transport in the Eastern Mediterranean towards a greener future. The project, which is co-funded by the European Union, is being implemented in three countries: Greece, Italy and Cyprus, with six European ports (Piraeus, Patras, Heraklion, Igoumenitsa, Limassol and Venice) and the LNG Terminal at Revithoussa.
- **SuperGreen:** The European co-funded SuperGreen project aims to implement a holistic approach to the transport sector in Greece, including the introduction of innovative technological systems aiming at using electricity in combination with other alternative fuels, such as LNG in shipping, providing cost and time efficient transport that is environmentally friendly and end-user friendly.
- **BlueHubs:** The BlueHubs programme aims to establish fundamental supply chains for the distribution of Natural Gas to port users in the form of LNG for ships, and LNG/NG for heavy vehicles and port buses. The action upgrades important parts of the Middle East and Eastern Mediterranean corridor by providing LNG and CNG tankage and refuelling facilities, creating a new intermodal maritime transport system integrated into the supply chain.
- **SecureGas:** DEPA Commercial participated as a partner in the research consortium for the implementation of the European project "SecureGas", funded by the European Union, under the EU Research and Innovation Program Horizon 2020, with the objective to increase the security and resilience of Gas Infrastructures against physical, digital and hybrid threats. In this context, DEPA led the management and organisation of the design and development of an integrated security system for the facilities of the Vehicle Refueling Stations with Compressed Natural Gas, as well as the procurement of the relevant supporting equipment, in order to enable the effective response to physical and digital threats to security, such as natural disasters, accidents, cyber attacks, malicious acts, criminal activity or terrorism.



- **The Floating Storage Regasification Unit (FSRU)**  
will transform Alexandroupoli into an energy crossroads of electricity and natural gas networks, with the potential to supply the domestic market and neighbouring countries. The new power plant is expected to be operational by the end of 2025 with an installed capacity of 840 MW.
- **High Efficiency Combined Heat and Power (CHP) projects:**  
High-efficiency cogeneration of heat and power (CHP) from the same fuel is a mature technology that is widely used in industry and is recognised as a best available technique (BAT) by the European Union. DEPA Commercial, wishing to contribute as much as possible to the energy efficiency efforts being made both at domestic and European level, is already supplying CNG to a state-of-the-art greenhouse in Serres (off-grid) that has a CHP installation with a demand of 5,000 Nm<sup>3</sup> per day and, in addition, the contract for the supply of CHP to the ANTHOUSSA SALFA **has already been awarded and the delivery is expected in January 2023.**
- **White Dragon:**  
The national proposal submitted to the call for expression of interest for the "White Dragon" Important Projects of Common European Interest (IPCEI) regarding Hydrogen represents a key step towards the energy transition through hydrogen technologies. DEPA Commercial, acting as the project coordinator, in cooperation with the country's leading Greek energy companies, have submitted to the Greek Government and the EU their investment proposal, worth a total of more than 8 billion Euro for the development of an innovative, integrated green hydrogen project in Greece, covering the entire hydrogen value chain.

## Liquefied natural gas and renewable energy sources



The Business Plan of DEPA Commercial includes corporate development projects that aim at further penetration of "clean" forms of energy, in order to make our corporate portfolio "green", such as:

**(a) Small Scale Liquefied Natural Gas (SSLNG) projects, (b) Renewable Energy Sources (RES) projects, (c) Hydrogen and Biomethane (H2BM) projects and (d) Energy Efficiency and Electrification projects.**

For the achievement of the coordinated monitoring of the implementation of these Projects, DEPA Commercial has created the Inter-Enterprise Project Management Office (PMO) as well as the appropriate organisational structure for each Project (Project Team) which consists of 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 off-grid customers 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 were explored.

### **a) LNG as ship fuel**

DEPA is the coordinator of the European POSEIDON MED II and Blue Hubs programs, and also participates 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) for the financing of the construction of the LNG refuelling vessel, while an international tender is currently underway for the selection of the shipyard for the construction of the refuelling vessel. In this regard, it is estimated that the ship will be ready for commercial operation in 2024. For this LNG refuelling vessel, EU co-funding has been secured through the BlueHubs programme. The refuelling ship will be supplied from the ship loading station in Revithoussa, which is under design and construction by DESFA. The tender for the supply of LNG tankers has also been completed with an estimated date of delivery in 2022. At the same time, the company is developing a commercial policy, conducting market research, and is exploring the possibility of concluding new commercial agreements, to enable the commencement of commercial activity as soon as the Revithoussa ship loading station is operational.

### **b) LNG for off-grid customers and 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 transmission of LNG for the said uses will be carried out by tankers and the LNG supply point will be the truck loading station in Revithoussa which is under construction by DESFA and is expected to be operational by the end of 2022. Furthermore, a tender for the supply of three LNG tankers was successfully conducted in 2021 and their delivery is expected in July 2022. At the same time, the Project Team has developed a commercial policy in this sector and is proceeding with the conclusion of commercial agreements to facilitate the launch of commercial activity as soon as the tanker loading station in Revithoussa is operational.

At the same time, DEPA Commercial commissioned a renowned international engineering consultancy company to carry out the basic design of two small-scale facilities (SSLNG) for industrial customers and an LNG refuelling station.

## (b) Renewable Energy Sources Project

In January 2021, the Board of Directors of our company approved the acquisition of 49% stake in the share capital of NORTH SOLAR S.A., which develops photovoltaic projects in Western Macedonia with a capacity of **500 MW**. This investment marks our entry into RES and is **part of the strengthening of our company's position in the sector of "green" and alternative energy sources** by developing the necessary infrastructure for this purpose. Further expansion of the RES-oriented portfolio is expected to continue in 2022.

## (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, a member of Hydrogen Europe and is developing independent projects in alternative and "cleaner" fuels, building on its long and diverse experience in the natural gas market. These projects will target customers operating in road transport, power generation and industrial sectors.

In order for DEPA to become more familiar with the respective technologies and have all the necessary data for their evaluation and scale-up, **pilot projects involving both hydrogen and biomethane are planned** and will be implemented. Regarding the biomethane project, during 2021, DEPA conducted a techno-economic study for the selection and sizing of suitable equipment, inventory of biogas plants and site investigation for the installation and operation of a pilot plant for the upgrading of biogas to biomethane, its subsequent compression and storage, for its further exploitation either by injection into the natural gas network or as a motor fuel (**bio-CNG**) through FISIKON stations.

Furthermore, in the Hydrogen sector, DEPA COMMERCIAL is particularly active. Specifically:

- The company plays an active role in the EUROPEAN CLEAN HYDROGEN ALLIANCE, which aims to attract investment in hydrogen and fuel cell technologies, playing a key role in implementing the new industrial strategy of the European Union and supporting investment to increase production and demand. The key deliverable of the European Clean Hydrogen Alliance is the identification of sustainable investment projects and the creation of a pool of these projects. **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 for a second consecutive year.**
- 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 organisations and National Associations) active in the field of hydrogen and fuel cells.

- In the context of the EU's intensifying initiatives to promote the use of hydrogen, as well as the planned delignitization in Western Macedonia, DEPA has taken a coordinating role in the "White Dragon" project (see above).

Hydrogen will also play an important role in the transport sector in the future. In the rest of Europe, the use of hydrogen in fuel cell vehicles is already penetrating the market. In this framework, DEPA Commercial has foreseen in its business plan the construction of a pilot commercial hydrogen refuelling station in order to de facto promote the use of hydrogen.

### **(d) Energy efficiency & electrification project:**

Taking into account the European and by extension national targets for increasing energy efficiency, reducing pollutants and consumption in the coming decades, and with a view to fulfilling the EU's commitment to climate neutrality by 2050 as set out in the European Green Deal, DEPA is exploring further possible future synergies as well as further expansion of energy efficiency schemes to larger and more energy-intensive consumers. The possibilities and ways of providing holistic energy solutions by combining the company's activities with energy services tailored to the individual consumer by utilising energy consumption data of the facilities are considered. In addition, energy efficiency systems for domestic consumers as well as the electrification sector are being developed by DEPA's Commercial subsidiary, Attica Gas Supply Company - Hellenic Energy Single Member Societe Anonyme Company (D.T. "Natural Gas - Hellenic Energy Company"). The commercial launch of these new services is expected in 2022.

## **Certifications**

DEPA Commercial is an accredited environmentally friendly corporate entity, as it has obtained the ISO 14001:2015 (Environmental Management System) certificate for the two Compressed Natural Gas Vehicle Refuelling Stations (SALFAs at LIOSSIA and ANTHOUSSA) and the ISO 50001:2018 (Energy Management System) certificate for the entire company.

Certification for these Systems reflects our ongoing commitment to protect the natural environment wherever we operate and our desire to reduce energy consumption both inside and outside our company.

At the same time, in 2018, a manual for Environmental Management Systems and Health and Safety Systems was created. The system complies with the requirements of ISO 14001:2015 for the environment and ISO 45001:2018 for occupational health and safety. The structure of the manual is in line with the ten chapters of ISO 14001:2015 and ISO 45001:2018 Standards, and follows the established common structure logic (high level structure) of all ISO Management Systems according to Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1.

In 2020, the development of an ISO 9001:2015 Quality System for DEPA's commercial activities was launched, while the certification of the system is expected to be completed in 2022.

## Energy Management System (EMS) of DEPA Commercial

DEPA Commercial implements a certified Energy Management System (EMS), as part of energy saving actions, which serves:

1. the recording of energy flows and the preparation of a Management plan so that, potentially, every form of energy is used in the most appropriate way,
2. the reduction of consumed energy and at the same time increase of efficiency during its operation.
3. the perception of 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 the carbon footprint of the company.





## Environmental Impact **GRI 304-2**

DEPA Commercial contributes decisively to the highlighting 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 the higher degree of efficiency of NG compared to other fuels is taken into consideration). Therefore, NG is a key factor to the substantial transition to renewable energy sources and their new major areas of use.

At the same time, natural gas acts as a "bridge" between conventional fossil energy resources and alternative forms of energy (hydrogen, biomethane, etc.) promoted at European level with various new legislative initiatives such as REPowerEU, the new Gas Package (Regulation 715/2009 and Directive 2007/73 under revision) and the Hydrogen Strategy.

In this regard, 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 sustainable and commercially competitive terms. The ultimate goal is to create a modern and cost-effective organisation, 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.



Based on this, the company continued to be informed in a timely manner regarding regulatory developments at the European and national level, as well as to communicate with ENERGY REGULATORY AUTHORITY (RAE) for the creation of the regulatory framework and the fulfillment of the obligations arising from it. At the same time, the company supports through its activities, mainly in natural gas, the commitments of the country to adopt measures regarding the achievement of targets in addressing climate change by adjusting its strategy accordingly. For example:

1. Active participation of the company in numerous public consultations at national and European level (RAE, DESFA, Ministry of Energy, European Commission).
2. Communication and consultations with RAE on several issues that arise from the current legislative and regulatory framework and have an impact on the smooth operation of the company.
3. Monitoring the European and global energy market with regard to the design of new climate actions and the implementation of activities contributing to achieving climate neutrality by 2050 through the "FIT FOR 55" package of measures as well as the REPowerEU plan, which sets out a number of additional short-term measures to combat high energy prices and address potential supply disruptions in connection with Russia.
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, Carbon Capture and Storage Working Group, Transparency Market Integrity Working Group, Transport Working Group), in order to directly assess the effects of the European

regulatory framework under development on the commercial operation of the Gas Companies and promote the strategic interests of the Company. In addition, as part of this participation, the company has an active role in the development of the gas trading hub in the Greek market, as well as the Trading Platform since its launch.

5. Regular submission of data to RAE relating to gas import prices and commercial activity, in accordance with the special conditions of the gas supply license, as well as to the Hellenic Statistical Authority regarding the indices of gas sales and supply prices.

## Protection of Natural Environment and Biodiversity

GRI 2-27

GRI 304-2



At DEPA Commercial we respect the natural environment and the ecosystems that surround us.

Our non-negotiable principle is not to cause damage to the flora and fauna of the areas where we operate, using prevention and restoration mechanisms.

With reference to the above, the company is committed to complying with the environmental legislation and undertake initiatives, through research and development studies during a) project construction and b) operation of the natural gas facilities, in order to identify those cases that require restoration measures to protect and upgrade the natural environment. At the same time, through the implementation of the Management Systems and the "Procedure for the Identification of Non-Compliances and

Management of Corrective and Preventive Actions", the company has established a 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")
- Comments

In this respect, the above procedure includes:

1. the identification and recording of non-compliances
2. their prioritisation and evaluation
3. the imposition of restoration (or simple correction)
4. the examination the causes of more serious or recurrent cases
5. the need to impose corrective actions to eliminate the cause of an existing non-compliance (or the need to impose actions to prevent an upcoming non-compliance)
6. the implementation of actions and the evaluation of their effectiveness

Our staff is activated, becomes aware and sensitized to environmental issues through training, information through the company's internal information channels (e.g. Intranet, bulletin boards, etc.), supervision of work, evaluation of proposals for improvement and participation in consultation, regarding the protection and conservation of biodiversity issues.

Through the internal information channels, our workforce receives information about the important environmental aspects and impact (actual and

potential) related to their work, about the negative results of various situations created by the workforce or by other factors in performing their duties, as presented in the Written Occupational Risk Assessments (WHAs) of the SALFAs and the Management building.

They are also informed about for the consequences of non-compliance with the System's requirements, including compliance obligations. In any case, workers 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 minimise or eliminate negative effects are taken. In addition to the staff, the contractors who work in the facilities of DEPA Commercial can also cause significant environmental impact.

For this reason, the company informs the contractors' staff and takes all necessary measures to prevent any potential or actual incident.

It should be stressed that, for the year 2021, the protection and promotion of the natural environment were prominent within the framework of the Corporate Responsibility actions we carried out. For example:



## Corporate Responsibility actions

Actions for the Protection and Conservation of the Natural Environment	Parnitha National Park	48,400 €
Support for Climate Neutrality Actions	Financial support to the action of Kozani "100 climate neutral cities by 2030"	25,000 €
Support for Bodies and Organisations with Environmental Action	Purchase of equipment for the Hellenic Fire Service	1,000 €
	Financial support for the Business Awards "Thales of Miletus"	7,000 €
Ecological Movement	Employees' Ecological Mobility Programme - OASA Unlimited Travel Card Subsidy	16,200€

Taking all the above into account, it is evident that the company has mechanisms and procedures in place and takes initiatives that shield the environment from any potential degradation that could potentially be caused as a result of our activities.

It is noted that the company has not caused any impact on the natural environment, and furthermore, it does not operate in areas protected either by Greek legislation (areas protected by law 3937/2011), or by European or international legislation, such as areas included in the Natura 2000 network or the Ramsar Convention. In addition, in the areas where the company operates, there are no species included in the Red List of Threatened Species of the International Union for Conservation of Nature (IUCN).

At the same time, in 2021, as in the previous two years (2019-2020), there were no incidents of non-compliance by DEPA Commercial (fines/administrative fines or other recommendations or observations) with respect to environmental legislation and regulations, which clearly demonstrates our firm commitment to environmental protection in practice.



## Environmental Management System

In the process of preparing the "Environmental Management System Design", the issues raised are the identification of the environmental aspects of the company's activities and the assessment of their impacts, their prioritisation and, of course, the taking of measures. The environmental aspects of the company are identified through:

- gas emissions
- from the use of raw materials and natural resources
- of waste and by-products
- of discharges to water
- the use of energy of the physical characteristics (e.g. size, shape, colour, appearance)
- of the discharges to land
- the energy emitted (e.g. heat, radiation or vibrations)

Moreover, the identification of the environmental aspects may result directly from the company's activities or indirectly from the providers, the use or the 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 upstream or downstream procedures of DEPA Commercial's activities.

In general, the company ensures its corporate reputation as environmentally friendly, as it annually carries out internal training (by specialised company staff or associates), as well as external training (at recognised educational institutions), while at the same time it has established a system of monitoring and measuring parameters with significant impact on Health & Safety, Work and the Environment.

These measurements concern the performance of the System and include:

- ✕ indices established for monitoring objectives and programmes,
- ✕ consumption of environmental parameters (e.g. NG., waste generation, energy consumption, consumption of natural resources, etc.),
- ✕ measurements of harmful factors (physical, chemical, biological) for occupational health and safety,
- ✕ monitoring of events, Safety/Health inspections, emergencies and non-compliances,
- ✕ other parameters related to the effectiveness of the System.

The System's performance measurement indices 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 "Procedure of Environmental and Health & Safety Operation Inspection".

## Employee Mobility Report

The company provided its employees with Public Transport Unlimited Travel Cards, as part of the information on the reduction of the carbon footprint arising from daily activities. In 2021, 29% of employees used the Unlimited Travel Card for their daily commute to and from work.

## Inspection and evaluation

In order to ensure the standard 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 (see Certifications above). Furthermore, the purpose of the inspections is to comply with the requirements of the Management Systems, as well as with the applicable legislation and the individual regulations.

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

- inform and train its staff on measures to prevent and reduce energy consumption, while encouraging them to take advantage of new opportunities to reduce energy consumption both in the performance of their work duties and in their private activities;
- thoroughly investigate ways to reduce energy consumption, reduce the use of conventional fossil fuels and increase the use of natural gas, as well as renewable or alternative energy sources. In fact, in order to achieve the above, the company has adopted the international standard for energy management ISO 50001:2018;
- protect the environment and prevent pollution from its activities;
- comply with all legal and other obligations relating to its activities concerning the protection of the environment;
- sets targets and develops improvement programmes which it systematically reviews in order to: continuously and further improve the company's performance on environmental issues;
- use natural resources (mainly NG and Electricity) in the most effective and technically feasible way;
- cooperate with national and local bodies that are responsible for the protection of the environment;
- ensure the continuous information of its staff, regarding the effects of their activities in relation to the Energy and Environmental Management Systems, as well as their awareness of Environmental protection issues.

# Waste Management

GRI 3-3

GRI 306-2

GRI 306-3

At DEPA Commercial we strongly support the principle of circular economy and the extension of the life of the materials used in our facilities. Driven by this consideration, we strive to produce as little waste as possible throughout our operations. In cases where waste production cannot be limited due to the specific nature of our industry, it is our strategic choice to find the best possible alternative ways of waste management, such as reuse or recycling of used materials through our cooperation with licensed waste management operators.

Our primary objective through the rational and efficient management of waste remains the protection of both the natural environment and human health as a whole.

Our primary objective through the rational and efficient management of waste remains the protection of both the natural environment and human health as a whole.

- ✘ paper,
- ✘ toner,
- ✘ plastic,
- ✘ waste electrical and electronic equipment,
- ✘ batteries and light bulbs

The collection, proper management and reduction of waste are a top priority for DEPA Commercial. In order to ensure the rational operation of the Environmental Management System with regard to waste, the company implements appropriate recycling programs for each type of waste from its activities. The collection, transport and disposal of individual waste is carried out by licensed operators registered in the Electronic Waste Register (EWR) of the Ministry of Environment and Energy and is made available to licensed final recipients.

In addition, all non-hazardous waste is delivered to licensed final recipients for recycling, while hazardous waste such as contaminated tow, etc. remains closed in a guarded warehouse until its removal by competent collection companies.

In this regard, for the year 2021, a quantity of 9,200 kg of contaminated absorbent materials was disposed of and was forwarded for recycling through a licensed partner company, 27.88tn of waste was produced at the Natural Gas Refuelling Stations for Buses (SALFAs). The entire amount of waste produced by the company was collected and forwarded for recycling. In addition, for the year 2021 there were no waste spills that caused negative impacts on the environment or human health.

By extension, we demonstrate for another year our practical commitment to the internationally recognised best practices of waste management and enable in our own way the promotion of practices to achieve an entirely circular economy.

Below is a summary table with data on the type and method of disposal used for the three-year period 2019-2021.

## Waste Management

Waste Description	2019	2020	2021	Method of Disposal
Used Batteries	14kg	63kg	47kg	Recycling through the portable battery recycling operator
Waste Electrical and Electronic Equipment (WEEE)	-	6.974,8kg	612kg	Recycling through a licensed WEEE recycling operator
Waste Lubricating Oil from Natural Gas stations.	400 lt	350 lt	500 lt	Recycling through a licensed recycling company
Liquid Waste from the SALFA in Anthoussa	18 m <sup>3</sup>	18 m <sup>3</sup>	18 m <sup>3</sup>	Recycling through a licensed wastewater transport company

## Water Management GRI 3-3 GRI 303-5

At DEPA Commercial we respect the importance of water and recognise the fact that access to clean water is a universal human good and therefore we always apply sound management of the water resources we consume as an economic entity. Thus, we contribute to Sustainable Development Goal 6 and monitor our company's performance in terms of the best possible management of water resources and our impact on the wider ecosystem in the areas where we operate.

The preservation of water as a natural resource valuable for life itself, leads our company to apply practices that ensure the most efficient use of water, while at the same time every effort is made to save the volume of water consumed in our facilities and offices. In particular, all the water consumed in our company comes from the EYDAP network and is used for the sanitary facilities, the kitchens, the cleaning of the premises in general and the garden of DEPA Commercial's facilities.

<sup>8</sup> The quantity is also recorded in the Electronic Waste Registry

In the year 2021, the water consumption of the company's facilities amounted to **4.283m<sup>3</sup>**.

The tables provided below show the aggregate data on DEPA Commercial's water consumption for the three-year period 2019-2021 and water volume consumption by facility for the year 2021.

Total Water Consumption		
2019	2020	2021
2,929m <sup>3</sup>	3,112m <sup>3</sup>	4,283m <sup>3</sup>

Total Water Consumption per Facility 2021			
DEPA (Mesogeion Avenue)	DEPA(Management Building)	SALFA LIOSIA	SALFA ANTHOUSSA
543m <sup>3</sup>	1,832m <sup>3</sup>	1,441m <sup>3</sup>	467m <sup>3</sup>

Based on the above data tables it may be concluded that from 2020 to 2021 the water consumption of DEPA Commercial increased by 37.62%, while compared to 2019 there was an increase of 46.22%. The increase in the volume of water consumption from 2020 to 2021 is largely justified if one takes into account the devastating fires that took place in East Attica, which inevitably led to the use of large quantities of water for firefighting.

Finally, it should be noted that due to the nature of our company's activities, there is no impact on the environment from the way we manage water resources, while their final disposal is carried out by use of the general rainwater network.



Society







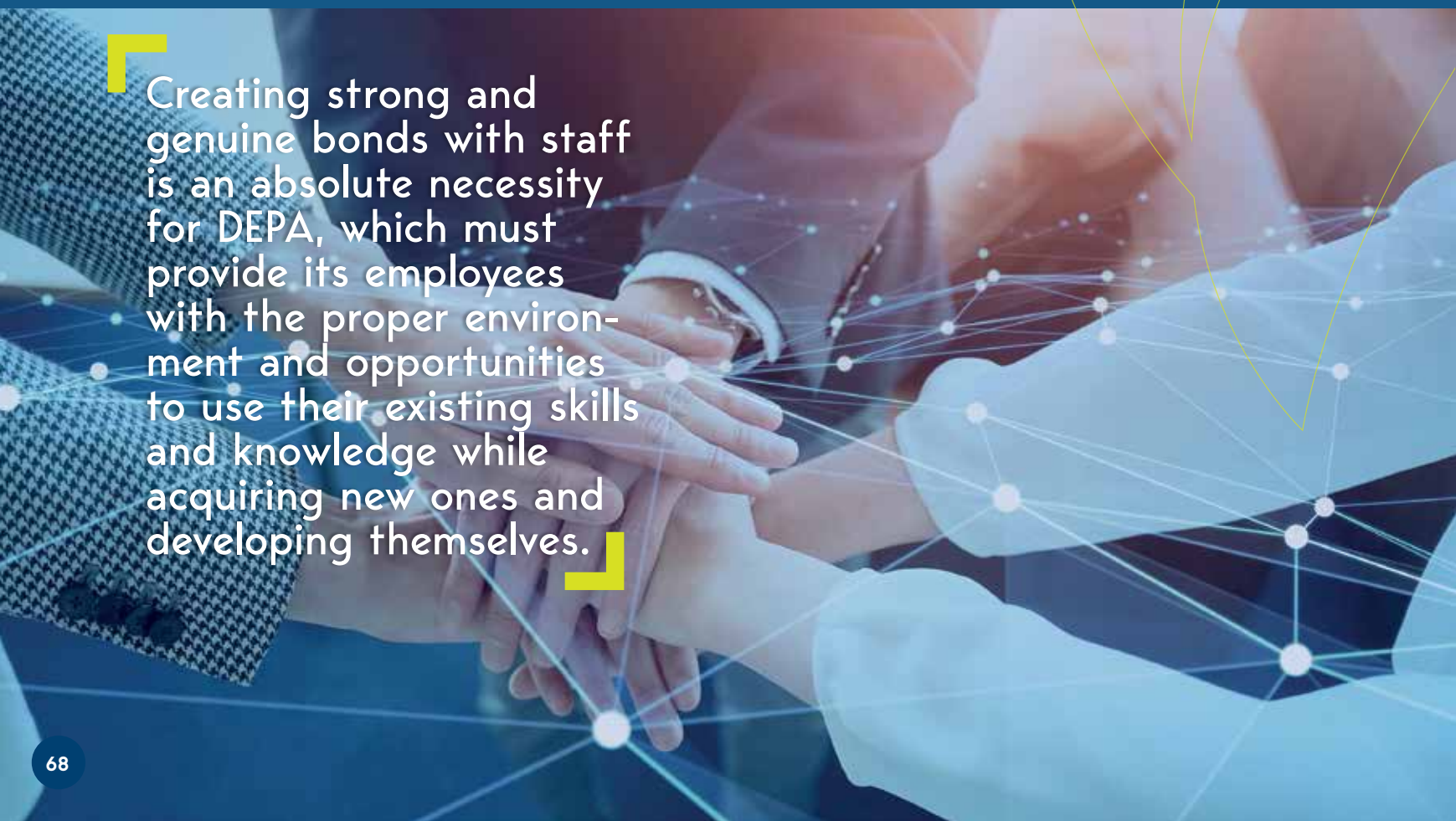
## Society

**At DEPA Commercial we are proud of the safe, healthy and respectful working environment we have created. The well-being of our human resources is our non-negotiable commitment, as it is considered the backbone of the company.**

Creating strong and genuine bonds with staff members is an absolute necessity for a company, which must provide its employees with the proper environment and opportunities to use their existing skills and knowledge, while acquiring new ones and developing themselves.

An integral part of DEPA Commercial's corporate culture is the sense of the company's duty to ensure these conditions, which we have demonstrated in practice throughout the years of our operation.

By incorporating into its corporate culture fundamental values such as equal opportunities for all, regardless of sex, age, nationality, religious or personal orientation, as well as respect for human and labour rights, DEPA Commercial is fully aligned with international, European and national texts and legislation.



Creating strong and genuine bonds with staff is an absolute necessity for DEPA, which must provide its employees with the proper environment and opportunities to use their existing skills and knowledge while acquiring new ones and developing themselves.



## Working Practices

GRI 3-3

For DEPA Commercial, employment is an essential issue as its workforce represents its commitment to business excellence. To this end, our company strives to maintain a pleasant, healthy working environment and constantly helps its staff to develop.

### Employment

GRI 2-7

GRI 2-8

GRI 2-21

GRI 2-30

At DEPA Commercial, we are well aware that the people who work for our company are its driving force, its enabler of growth. This is why we provide our employees with a modern, yet stable working environment full of security, respect and opportunities for advancement and progress.

As of 31.12.2021, the staff of DEPA Commercial had 30 employees under a dependent employment relationship for an indefinite period of time. In addition, the company employed 5 lawyers under a contract for remunerated mandate. In 2021, DEPA continued its cooperation with companies that provided administrative, financial and operational support services, as well as logistics and operation and maintenance services for the SALFAs.

For the year 2021, our human resources total 187 people, of which 89 are women and 98 are men, all employed in the Prefecture of Attica. It is worth noting that in 2020, DEPA Commercial employed 168 people, namely 82 women and 86 men, again in the Prefecture of Attica. Therefore, in 2021, DEPA Commercial increased its workforce by 11.3% and the presence of women employees in its total workforce by 8.5%. All of the company's employees (100%) are full-time and the company has no part-time staff.

The number of employees in a position of responsibility in the company is 33 (17 men and 16 women). There were no employees with non-

guaranteed working hours in the company, while 4 of our employees belong to the category of disabled people (2 men and 2 women).

The percentage of employees in DEPA Commercial covered by Collective Labour Agreements reached 85.7% for 2021<sup>9</sup>. The number of people who are not employees but provide their services to DEPA Commercial as independent professionals totals 9 people: 4 Engineers who provide their services under a note for services rendered and 5 Lawyers under a contract for remunerated mandate. The methodology used to calculate the total number of employees who are not employees but provide their services to DEPA Commercial is the head-count method.

There is an increase in the total number of workers in fiscal year 2021 compared to fiscal year 2020 due to continued growth in business needs.

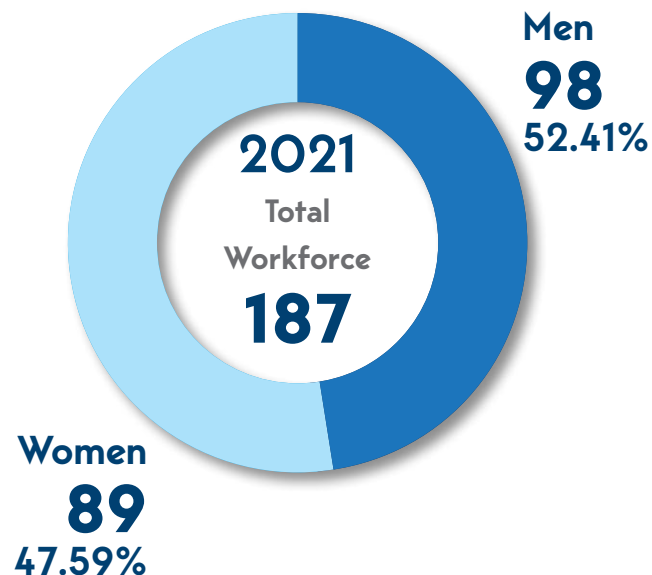
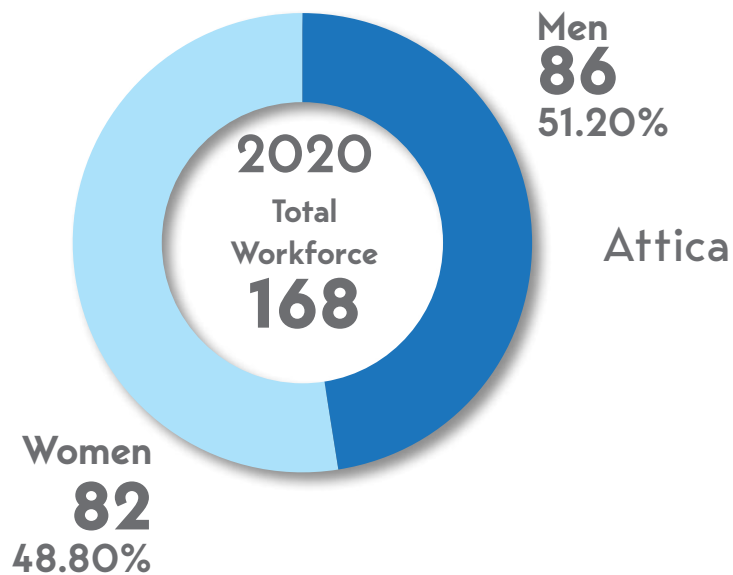
Creating strong and genuine bonds with staff is an absolute necessity for a company, which must provide its employees with the proper environment and opportunities to use their existing skills and knowledge, while acquiring new ones and developing themselves.

As regards the methodologies for calculating the total number of employees, the head-count method is used to aggregate the data at the end of the reference period.

<sup>9</sup>  $(30^{**}/35^{*}) \times 100 = 85,7\%$

\* Pertains to DEPA personnel, i.e., personnel with an employment relationship and lawyers with a service contract with DEPA. The number is 35 and not 37 as 2 individuals are exempt, the Chairman of the Board of Directors, and the CEO

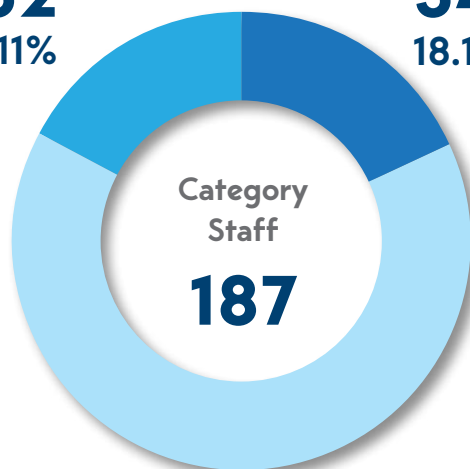
\*\* Pertains to DEPA personnel, only those with an employment relationship with DEPA. Collective bargaining negotiations between Management and employees - including 2021 - were conducted within the framework defined by legislative regulations for public enterprises. DEPA complies with all legislative regulations for public sector companies



Sex of Employees	Staff with a fixed-term contract	Staff under a contract of indefinite duration	Total
Men	80	18	<b>98</b>
Women	70	19	<b>89</b>
Total	<b>150</b>	<b>37</b>	<b>187</b>

### Technical Staff

**32**  
17.11%



### Technical Staff

**34**  
18.18%

### Administrative Staff<sup>11</sup>

**121**  
64.70%

<sup>10</sup> Personnel of contractor companies

<sup>11</sup> Administrative/office personnel refers to office staff

**>50 years old**  
Number of employees

**62**  
33.15%



**<30 years old**  
Number of employees

**6**  
3.22%

**30-50 years old**  
Number of employees

**119**  
63.63%

### Recruitment Data

By Sex	2021	2020	Geographical Location
Women	10	11	Attica
Men	13	12	Attica
Total	23	23	Attica
By Age	2021	2020	Geographical Location
<30	5	5	Attica
30-50	15	16	Attica
>50	3	2	Attica
Total	23	23	Attica

## Departure data

By Sex	2021	2020	Geographical Location
<b>Women</b>	4	23	Attica
<b>Men</b>	3	28	Attica
<b>Total</b>	<b>7</b>	<b>51</b>	<b>Attica</b>

By Age	2021	2020	Geographical Location
<b>&lt;30</b>	2	1	Attica
<b>30-50</b>	2	33	Attica
<b>&gt;50</b>	3	17	Attica
<b>Total</b>	<b>7</b>	<b>51</b>	<b>Attica</b>

The remuneration of the company's staff and the year 2021 was determined by a two-year company-level collective agreement (CLCA) that was agreed and signed at the beginning of 2020.

The remuneration and working conditions of the 2009 CLCA, which by the 2020 CLCA were still in force, had been adapted to the provisions of Laws 3833/2010, 3845/2010 and Law 4354/2015, under which the public undertakings referred to in chap. B of Law 3429/2005.

At the beginning of 2021, in the context of reducing its operating costs, the company also took actions to reduce overtime costs, setting

limits per organisational unit, which were achieved. DEPA Commercial fully meets all its obligations towards its staff, as agreed in the Company-Level Collective Agreement.

The annual total remuneration ratio of the highest paid person in the company to the average annual total remuneration of all employees (excluding the highest paid person) was 1.56 in 2021.

The percentage increase in annual total remuneration for the highest paid individual in the organisation to the average percentage increase in annual total remuneration for all employees in the organisation, excluding the highest paid individual, was 0.91 for 2021.

The recruitment of DEPA staff is carried out through competitions and criteria set by the Supreme Council for Civil Personnel Selection (ASEP) The rate of deviation of the typical monthly salary of a new recruit in relation to the minimum wage is 36%. The total number of working days of human resources for 2021 was 40,319, of which 20,702 were for men and 19,617 for women. The total number of days on which staff was absent for 2021 was 55, of which 35 were for men and 20 for women.

## Labour relations

GRI 402-1

At DEPA Commercial, we are particularly sensitive to issues that involve significant operational changes for our employees, so we ensure that there is sufficient time for them to make the necessary adjustments to any new data or operational changes that will have a significant impact on their working situation. When such issues arise, there is a relevant provision in our Rules of Procedure, under which the consent of the employee concerned is sought.

The company has no specific policy or procedure for minimum notice regarding operational changes, and committees meet when necessary without any specific periodicity.

It should be stressed at this point that for the year 2021, no incidents of violation of labour legislation by DEPA Commercial were recorded.

## Protection of the right to freedom of association

The company fully recognises and respects the right to freedom of association, i.e. the right of employees to form and participate in trade unions and to engage in collective bargaining. DEPA Commercial facilitates trade unionism by every possible means, in particular it has a hall for union elections, grants leave on trade union business, etc.

In the year 2021, there were no reported incidents of violation of the right to freedom of association.

## Benefits to employees

GRI 401-2

GRI 401-3

The company offers all full-time employees additional programs to ensure an optimal work-life balance. In particular, it provides maternity/paternity leave, retirement provision, financial aid for children's camps and gifts for employees' children at Christmas, subsidies for public transport cards, and awards for the children of employees who excel.

The pension scheme through the company's insurer has been operating since 1996, based on contribution payment, and both the company and its employees participate in it. Under this scheme, there is also an Endorsement, which makes provision for the payment of a one-off allowance for Serious Diseases.

The Company provides the statutory maternity leave days. Regarding maternity leave in 2021, 3 employees (2 men & 1 woman) were entitled to parental leave (maternity/paternity leave). Of these people, parental leave was granted to one (1) employee, who returned to work and remains 12 months after her return. Consequently, the return to work rate was 100% and the employee retention rate was also 100%.



Employee training

GRI 404-1

GRI 404-2

At DEPA Commercial, the issue of continuous education and training of our workforce is a priority. The nature of our industry requires the systematic upgrading of our knowledge in order to be able to find solutions to the needs that arise on a daily basis. We know that the fostering of specialised knowledge and skills will lead to the further development of the staff and the company itself, resulting in the provision of optimum services to our customers.

For the year 2021 the number of employees trained amounted to **146** out of a total of 187 (78.08% of employees).

Average Training Hours per Employee - 2021

Analysis / By gender

Women	29.88 hours
Men	24.18 hours
Total	26.89 hours

Analysis/ By Occupational Category

Executive Staff	34 hours
Administrative Staff	24.24 hours
Technical Staff	31 hours

## Training programmes and lifelong learning for our employees

At DEPA Commercial, all employees, regardless of their employment relationship, have the same training opportunities. In 2021, 146 employees were trained. DEPA Commercial employees in 2021 participated in **9** seminars, **19** conferences & **21** in-house programmes. In this respect, 5,030 hours of training programmes were carried out, i.e. 2,370 hours for male employees and 2,660 hours for female employees respectively.

Topics of the Programmes
Health, Safety & ISO Standards
Information Systems / Technology
Labour, Insurance & Pension
Sales / Customer Service / Negotiations
HR issues Corporate Social Responsibility issues
Information Systems
International Energy Fora
Matters of Economic Interest
Legal Issues
Internal Audit issues

Training was also held during the year on "Legislative provisions on retirement issues", which was presented by a labour specialist. A total of 35 people (employees over 55 years old) participated.

### Employee evaluation GRI 404-3

In the framework of the Human Resources Development Centres project, an evaluation of the staff was carried out. More specifically, the total number of employees who participated in 2021 was 36, namely 21 men and 15 women. The percentage of men who participated in the Skills Development Centres was 10.20%. The percentage of women who participated in the Skills Development Centres was 16.85%. The entire staff of the company (34 employees, of which 24 permanent employees - 100% participation) participated in the evaluation procedure. In addition, 2 members of the permanent administrative staff participated (1.52% participation). The percentage of employees participating in the Skills Development Centres was 13.90%.



## Emergency plans and occupational health and safety

GRI 3-3

The sustainable development of DEPA Commercial is closely linked to securing and maintaining a work environment that meets the needs of our professional community. The health, mental and physical, as well as the safety of our employees, associates and customers is of primary importance in our corporate culture.

To this end, DEPA Commercial complies with all safety measures provided for in national and European legislation, promotes the continuous training of its employees in the individual topics on Health and Safety in the workplace, acts with a view to eliminating accidents and illnesses arising from work activity and maintains a coherent Health and Safety Management System.

At DEPA Commercial, the Division for the Procedure, Safety and Quality Operations is responsible for managing all matters relating to health and safety.

## Health and Safety Policy

GRI 403-2

At DEPA Commercial, our commitment to providing a safe and healthy working environment is reflected into an Internal Health and Safety Policy within the framework of the Code of Professional Conduct and Ethics of our company. In this regard, 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 the individual safety and hygiene programmes organised by the competent services and immediately report to the competent authorities for Health and Safety any situations that may cause accidents.

In addition, to further enhance safe working conditions in the company, our executives, employees and associates are not allowed to use prohibited substances or consume alcoholic beverages during working hours, as well as to use mobile phones while driving during their business trips.

Specifically, our company is committed to:

- preventing work accidents and occupational diseases
- cooperating with national and local bodies that are responsible for occupational Health & Safety
- complying with all the relevant legal and other obligations, regarding employee Health & Safety
- ensuring that the entire staff are constantly informed about the effects of their activities with regard to the Management of occupational Health & Safety, as well as aware of all these issues
- determining objectives and improvement programmes, which systematically reviews in pursuit of the continuous and further improvement of the Company's performance on Health & Safety matters

- ensuring the availability of the necessary resources to establish, implement, maintain and improve the Health & Safety System
- communicating and making available to all employees of the company this policy

## Health & Safety Management System

GRI 403-1

GRI 403-2

GRI 403-4

DEPA Commercial implements a Health & Safety Management System which meets the requirements of ISO 45001:2018. In this respect, the two compressed natural gas refuelling stations (SALFA in ANTHOUSSAS and ANO LIOSIA) are certified.

In the light of this, the company is committed to operating in a manner that respects the Health and Safety of its employees, striving to minimise and ideally eliminate risks to the Health and Safety of its employees, associates, customers and visitors in its workplace.

It should be stressed that there are no cases (employees, activities or workplaces) where this system does not apply.

In detail, for the year 2021, the 100% of our employees are covered by the Occupational Health and Safety Management System, while the 17.6% of employees are covered by the Management System which has been controlled and certified by an external partner.

The Senior Management of DEPA has defined specific responsibilities and roles for employees, so that the Health and Safety

System is implemented seamlessly. 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. For the proper operation of the Management Systems, the supervision is carried out by the Head of the Division for the Procedure, Safety and Quality Operations (HPSQO).

## Responsibilities of the HPSQO

The Head of the Division for Procedure, Safety and Quality Operations (HPSQO), has the primary responsibility for coordinating the actions that ensure that the Health and Safety System is implemented, maintained and improved in accordance with the requirements of ISO 45001:2018 and in addition reports to the Senior Management who is informed on the performance of the System through the Review, as well as through other regular and ad hoc briefing, formulating proposals on improvement. For Occupational Health and Safety, the responsibility for the operation of the Health and Safety Management System lies with the Health and Safety Manager, who reports to the HPSQO. The company's institutionalised advisory bodies, namely the Safety Technician and the Occupational Physician, also contribute significantly with their own comments, proposals and advice to the development of business awareness on Health and Safety issues.

At the SALFA Stations, due to the nature of DEPA's operations, the Head of the SALFAs has an important role in the implementation

and control of the established procedures. All employees of DEPA bear the primary responsibility for implementing the documented information that has been prepared and communicated to them, so that the work undertaken is carried out safely, without endangering their health.

## **Employee participation and consultation**

Employees have the legal right to set up an Employee Health & Safety Committee (EHSC) in accordance with Law 3850/2010, where Important Health & Safety and Environmental (HSE) issues are discussed in depth and its meetings constitute a wider consultation body. This Group of Employees for HSE issues is set up on the initiative of the employees' Union and includes the Head of the Division for the Procedures, Safety and Quality (HPSQ) and the OHS Manager.

The employees participate in the consultation on Occupational Health & Safety issues, which takes place in a number of ways. Employees have been given the right to freely send proposals for improvement either through the intranet, or in boxes that can be placed in various parts of DEPA Commercial's facilities.

Examples of the most common issues to be consulted are:

- 1. the results of the Written Occupational Risk Assessment and the assessment of existing or new "compliance obligations"**
- 2. the choice of personal protection equipment**
- 3. the choice of work equipment and tools**
- 4. taking measures upon evaluation of the results of the measurements of harmful factors**
- 5. the investigation of incidents**
- 6. the implementation of actions related to the occurrence of non-compliances**
- 7. other issues related to Occupational Health & Safety**

In order to ensure that the above procedure does not become meaningless and devoid of purpose, the Management of DEPA Commercial is committed to providing employees with all the necessary resources (participation time, training, etc.) to ensure their effective participation in the consultation.

Risk identification and incident investigation

GRI 403-2

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

Categories of Potential Risks		
Safety risks from:	Health risks from:	Ergonomic or Occupational Risks from:
<ul style="list-style-type: none"><li>• building structures</li><li>• working equipment</li><li>• electrical installations</li><li>• dangerous substances</li><li>• fires and explosions</li></ul>	<ul style="list-style-type: none"><li>• chemical factors</li><li>• physical factors</li><li>• biological factors</li></ul>	<ul style="list-style-type: none"><li>• work organisation</li><li>• psychological factors</li><li>• adverse conditions</li></ul>

### Emergency Management Team

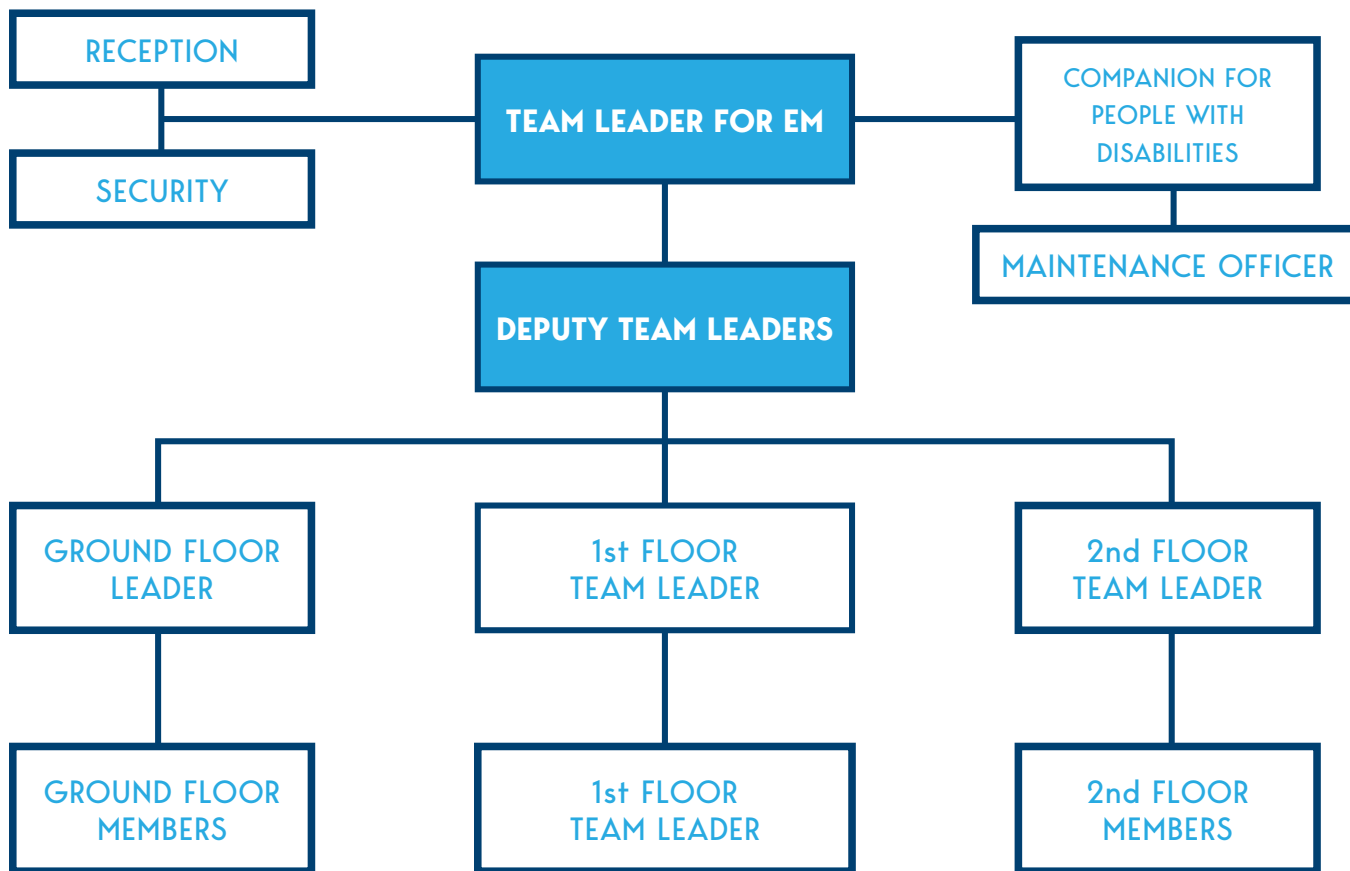
DEPA has developed an Emergency Management (EM) Plan to deal with risks such as: fire hazards in the building, earthquake, bomb threat or accident. The members of this team know how to act in such cases, in order to guide, protect and support their colleagues and third parties, and if possible, to deal with the danger.

All members of the EM team (100%) are trained in a) emergency response and risk management, b) First Aid and c) planned or unplanned building evacuation drills. In addition, all SALFA staff (100%) has received training in First Aid, Fire Safety and Fire Protection, Occupational Safety (Safe Use of Tools & Power Tools, as well as Safe Working in Electrical Areas).

Finally, all company staff (100% participation) have trained in emergency response and specific work-related risks. All of the above training programmes were carried out for 2021 by specialised external training providers.

In order to achieve the full effectiveness of this program, DEPA Commercial opts to update it frequently with new data and procedures that correspond to the current circumstances and lead to its modernisation and, of course, its proper implementation.





## Health and safety services

DEPA has an Occupational Physician and a Safety Technician. Through their periodic visits to the workplace, they ensure that potential hazards in the workplace are eliminated and minimised.

## Health and safety training GRI 403-5

For occupational health and safety issues, the competent management of the company annually plans training programmes for all staff. For the year 2021 there were 5 programmes addressed to all staff.

More specialised health and safety seminars are implemented on an annual basis for employees of the Natural Gas Refuelling Stations for Vehicles and the Emergency Management Team, which are mandatory.

All trainings are provided free of charge to employees during working hours and trainees are paid regularly.

For the year 2021, 455 hours of training programmes were organised on issues related to Occupational Health and Safety.

## Health and Safety Training in the Company

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1. Principles of Occupational Health and Safety

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2. First Aid

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3. Occupational Health & Safety Week:

i. Basic Fire Safety Principles

ii. Limits: Mental Health Protection Shield

iii. Basic First Aid for All: Knowledge saves lives

iv. Prevention of Musculoskeletal & Eye Stress at Work

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4. Fire safety - Fire protection

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5. Emergency response

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## Employee Welfare - Health & Safety Benefits

The Health, Safety & Wellbeing of our employees is our first priority and a core company value of DEPA Commercial for all its activities, since ensuring this is essential to the company's business growth and prosperity. With this in mind, the company promotes Health, Safety & Wellbeing in the workplace by:

1. Strengthening risk prevention and mitigation measures
2. Committing to providing the necessary resources for the implementation of Health & Safety objectives

Ensuring the health of employees is an integral part of DEPA's policy and is monitored through periodic visits by the Occupational Doctor.

DEPA procured and installed at a central point of its building an Automatic External Defibrillator (AED) for the treatment of sudden cardiac arrest.



## Additional Benefits

Provision of a Group Insurance Plan that includes:

- Life insurance;
- Permanent total and partial disability insurance, due to illness or accident;
- Pharmaceutical and hospital care insurance and loss of income due to illness or accident insurance.

The above benefits apply to all employees and their dependants, and are a modern "tool" for creating a positive working environment, thus safeguarding the health of employees and their families.

## Employee health & safety during the Covid-19 pandemic

GRI 403-3

In 2021, the effects of the pandemic caused by the SARS-CoV-2 virus continued to spread and although largely addressed by advances in vaccination, they had not ceased to affect us. In this extremely unprecedented situation, DEPA Commercial has set the health and safety of its employees and all its partners as its top priority. In this regard, DEPA Commercial has meticulously followed the instructions of the Authorities, the National Public Health Organisation, the World Health Organisation and the Occupational Doctors to combat Covid-19, by implementing a series of actions to ensure that its

employees are protected and that all its activities and supply in the market are maintained, while taking initiatives to support the National Health System, actively showing its solidarity with the community in these difficult circumstances.

Therefore, for the year 2021 as well, the company showed quick reflexes against the global health crisis by taking protective and preventive measures against Covid-19.

1. An extensive remote work programme was adopted, so that our employees could take turns working from their own premises, to avoid coming to the company's premises where the risk to contract the virus would potentially become higher.
2. Regular thorough disinfections were carried out in all spaces of our company.
3. All the necessary personal protection and prevention equipment (PPE) was provided to all the company's employees.
4. In the year 2021, frequent Covid-19 laboratory tests were carried out on employees and external partners, and their entry to the premises was allowed upon showing a negative test result.
5. There were regular updates on current developments regarding Covid-19.
6. We avoided meetings and conferences within the company building and turned to other forms of communication, such as video conferences.

### **Management Cause of Action**

The company has developed a Suspected Cases Management Plan for Covid-19, to manage and respond to incidents (suspected or confirmed cases of Covid-19) during the pandemic. The Head of Suspected Cases Management guides and supports all colleagues, in order to manage each incident promptly and with the safety of employees and their families in mind.

### **Updating the Suspected Cases Management Plan**

The Suspected Cases Management Plan shall be amended in case the relevant NPHO guidelines are revised, so that it remains up to date and is able to be adequately and effectively implemented if its activation becomes necessary. The Plan is reviewed and updated by the Plan's Maintenance Officer.

### **Staff Notification**

All employees employed by DEPA Commercial are notified of and trained on the subjects of the Plan, as well as on any new relevant directive/decision announced.



# Employee health & safety indicators

GRI 403-9

GRI 403-10

Committed to eliminating workplace accidents and injuries as well as illnesses among its employees, DEPA Commercial recorded only one workplace injury in 2021, with no dangerous workplace accidents and zero fatal injuries. The workplace accident involved a male employee, staff of a contractor who has been awarded the Contract for the Support of Operations & Maintenance of the Vehicle Gas Refuelling Stations. The man was slightly injured when an unknown person threw a stone at him in Ano Liosia

No work days were lost due to this injury.

In addition, no cases of work-related illness were reported.

For more detail, a comparative table showing the progress made in the field of occupational Health & Safety from 2019 to 2021 follows:

INJURY RATE			
	2019	2020	2021
Total working hours of our human resources <sup>12</sup>	316,35	310,890	321,139
Accident Frequency Rate <sup>13</sup>			0,62
Severity Rate <sup>14</sup>			0

Of the total working hours of our human resources for 2021 (321,139), 171,504 were by men and 149,665 by women. The total number of days lost for 2021 was 985, of which 825 referred to men and 160 to women.

12 Also includes employees of contractor companies  
 13 Calculations are based on 200,000 labor hours  
 14 Calculations are based on 200,000 labor hours

## Relations with society

GRI 3-3

At DEPA Commercial, we care about the well-being of our employees and our society as a whole, and we want to demonstrate this in practice. As a responsible corporate citizen, DEPA Commercial seeks to be a role model organisation for its work and ongoing contribution to society.

Indeed, we act as an agent of well-being for society, consistently investing in programmes that aim to improve, raise the value and promote the overall well-being of the wider community.

DEPA's contribution to the well-being of Greek society implies a continuous and substantial offering, through support actions that embrace the entire society, focusing mainly on the following areas:

- People, with a focus on the most vulnerable groups. The aim of DEPA Commercial is to contribute to improving the living conditions and the quality of life of vulnerable social groups, either through its own initiatives or through synergies.
- Science, research and education, with an emphasis on new technologies. As a champion of young people and the sustainable development of the future market and always within the context of education, research and science activities, DEPA Commercial promotes the professional employment of students and young scientists, as well as the exploitation and promotion of industrial and experimental research in scientific fields of special interest.





In addition, the role of DEPA Commercial in the overall course of Greece in terms of finances and growth is self-evident. In itself, the implementation of the natural gas transmission network is one of the largest development projects to have ever been implemented in the country. By creating new energy infrastructure, the company is supplying Greece with cheaper, safer, more efficient and, undoubtedly, more environmentally friendly energy. By making Greece a key energy channel for Europe, it upgrades the country's international position, attracts new investments and business activities and, as a consequence, creates new employment opportunities. It also creates new growth opportunities for thousands of businesses, crafts and industries, as well as obvious benefits for millions of households and consumers.

Just as important as the developmental and economic benefits that are spreading to society, is the fact that today, millions of consumers, regardless of their social origin or economic stratification, take for granted the contribution of natural gas to improving their daily routine and quality of life.

With supportive actions, donations and sponsorships, the company promotes the arts, culture, sports (donations and support of amateur sports clubs and teams), as well as social solidarity.

In 2021, the Corporate Social Responsibility actions of our company continued, with the implementation of practices aiming at:

- ensuring the health and safety of our employees and partners
- promoting Sustainable Development and creating a culture around clean energy

- supporting society and the local market
- developing and strengthening actions that contribute to the achievement of social well-being and cohesion
- promoting sports and culture
- encouraging the young generations
- strengthening the health system
- maintaining effective communication with all stakeholders

For the year 2021, the total amount spent on the above actions amounted to **€ 533,121.88**.



Indicatively:

<b>Actions</b>	<b>Monetary Amount</b>	<b>Percentage</b>
Support for Social Structures and Vulnerable Groups	<b>85,017,50 €</b>	<b>15.94 %</b>
Hospital equipment	<b>14,932,58 €</b>	<b>2.80 %</b>
Education and Youth	<b>36,500 €</b>	<b>6.76 %</b>
Sports	<b>3,500 €</b>	<b>0.65 %</b>
Culture	<b>9,500 €</b>	<b>1.78 %</b>
Support for Bodies and Events	<b>81,400 €</b>	<b>15.20 %</b>
Human Resources / Market	<b>302,271,8 €</b>	<b>56.70 %</b>
<b>Total</b>	<b>533,121,88 €</b>	<b>100%</b>

In 2021, we financially supported social structures and vulnerable groups (Financial support to the Holy Metropolis of Nea Ionia & Philadelphia, the Association SKYTALI at Makryrrachi, Fthiotis for the development of mountain tourism), organisations and events (purchase of equipment to the Hellenic Fire Service. In addition, we financially supported the action of the Kozani Prefecture "100 climate neutral cities by 2030") as well as actions related to the fields of sport (financial support to the Hellenic Paralympic Committee), culture (financial support to the Local District of Figalia - Bust of a hero of the 1821 Greek Revolution) and environmental protection (National Park of Parnitha). In addition, we provided medical and health equipment to hospitals (General Hospital - Health Centre of Kalymnos "To Yuvaleio") and educational equipment to schools (127th Primary School of Athens), while we offered free natural gas to those in needed (supply of NG in a vehicle of the Athens Homeless Shelter-Kyada).

## Cultural Heritage

At DEPA Commercial we respect the rich cultural heritage of Greece and we take care to protect, preserve and enhance it. From its start until today, DEPA Commercial has treated archaeological research as a valuable and integral element of the overall dimension of its projects, offering relevant support for the execution of excavation activities. As you can find out on the website dedicated to the historical findings "DEPA - Window to History", during the construction of the central gas pipeline from the Greek-Bulgarian border to Attica, impressive findings of the Mycenaean period were discovered, such as: vases, tombs, building remains, figurines, sculptures, funerary offerings, tombstones and parts of the ancient Sacred Way.

## Respect for human rights and equal opportunities

- GRI 3-3

GRI 2-16

GRI 2-23
- GRI 2-24

GRI 2-25

GRI 2-26
- GRI 2-27

GRI 406-1

GRI 405-2

Human rights and equal opportunities are essential foundations for achieving sustainable development. Companies that respect these universal values help create a more just and equitable society, thus contributing to the achievement of the 17 UN Sustainable Development Goals.

In this context, DEPA Commercial's primary concern is the absence of discrimination between its employees and associates. It is an essential matter for our company to follow and strictly comply with the legislation on labour rights

including reports related to respect for human rights and child and forced labour.

Since 2014, when our Code of Professional Conduct and Ethics was drafted and in which an explicit reference is made to the respect for the personality of our employees, suppliers, providers and associates, the company has actively supported the principles of equal treatment, the proper management of diversity, and the recognition of freedom of expression. In this way, we act with a view to defending human rights and eliminating all forms of discrimination in the workplace.

In support of this, the competent Corporate Conduct Committee of DEPA Commercial has the responsibility of controlling and managing incidents of human rights violations, while its work is assisted by the Human Resources Division. In this direction, provision has been made for agreements that bring significant investment, financial and social benefits to make specific reference to the respect of human rights and, in particular, labour rights.

The company encourages members of the Management, executives, employees and generally those who provide services to DEPA Commercial to freely disclose to the Corporate Conduct Committee any conduct or action that may deviate from what is regarded as appropriate conduct or action.

If any employee or associate 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 Operations and/or to the Corporate Conduct Committee, who will handle the matter confidentially, impartially and with sensitivity for all people involved. Overall, for the year 2021, zero incidents of discrimination and zero incidents of human rights violations were recorded in our company.

DEPA Commercial will not take, nor will it tolerate the taking of any negative action against any natural or legal person for submitting complaints, grievances or reports of violation of a law, rule, regulation, internal policy, or for their participation in the investigation of a possible violation of the above. Overall, the company ensures that labour relations are characterised by meritocracy and transparency, as its priority is to maintain a working atmosphere of mutual trust, cooperation and understanding.

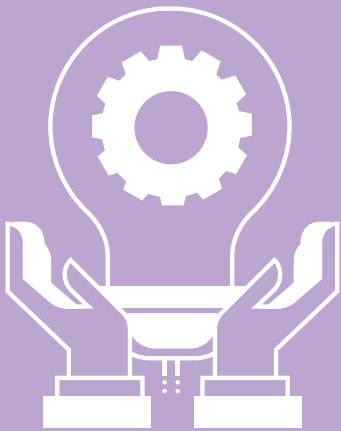
The " people-oriented " direction of the company is confirmed in all the Group's organisational functions, which emphasise team spirit, communication at all levels of the hierarchy, and creation of a working environment that fosters diversity and encourages attitudes far from stereotypes and discrimination. It should be noted that:

It should be noted that:

- 4 people from our human resources belong to the category of people with disabilities (2 men and 2 women)
- 51.35 % of total permanent staff consists of women (19 people)
- Remuneration in the company does not vary according to gender
- There are no cases of child labour at DEPA Commercial
- There are no cases of forced labour at DEPA Commercial

The company's aim is to act proactively to avoid any phenomenon that may affect the rights of its employees and the employees of its support service providers or other suppliers. In particular, in the case of security and cleaning services, the company checks the obligations of the providers to their staff arising from the rules of labour legislation and the terms of the collective agreements in force and requires the adherence to them with respect to their staff. The company provides equal opportunities to all its employees and associates, both regarding recruitment criteria, as well as promotions and the filling of vacant positions of the organisational chart.

The value, qualifications and performance of individuals are the criteria on the basis of which the more complex.



# Corporate Governance





# Corporate Governance

## Composition of the Board of Directors

GRI 2-9

GRI 2-10

GRI 2-11

At DEPA Commercial, the composition of the Board of Directors is considered a key factor for the proper and smooth operation of the company. The aim is the continuous development and optimisation of the company's practices on matters concerning society, the environment and the company itself.

The General Meeting of Shareholders is the supreme body, while the Board of Directors is the company's supreme management body, which formulates the company's strategy and development policy, supervising and controlling the management of its assets. The Board of Directors consists of 11 members with a five-year term of office.



The composition of the Board of Directors on 31.12.2021 was as follows:

## Composition of the Board of Directors

<b>Ioannis Papadopoulos</b>	Chairman of the Board of Directors
<b>Konstantinos Xifaras</b>	CEO
<b>Iordanis Prokopidis</b>	Vice-Chair of the Board of Directors
<b>Panagiotis Dimitropoulos</b>	Board Member
<b>Eleni Zilakaki</b>	Member of the Board of Directors, Representative of DEPA Employees
<b>Pavlos Kamaras</b>	Board Member
<b>Evangelos Kosmas</b>	Member of the Board of Directors, Representative of DEPA Employees
<b>Marika Lamprou</b>	Board Member
<b>Dimitrios Samolis</b>	Board Member
<b>Dimitrios Skalaïos</b>	Board Member
<b>Asimakis Fotopoulos</b>	Board Member

## Other members of the Board of Directors during the financial year:

<b>Konstantinos Andriosopoulos</b>	Board Member (Vice-Chair of the Board until 15.02.2021 )
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As the company is not listed on the Stock Exchange, there is no distinction between executive and non-executive and independent members.

The Board of Directors of DEPA Commercial consists of a total of 11 members, 7 of whom are elected by the General Assembly of the company's shareholders and 2 others represent the company's employees, elected by direct and universal suffrage and by the system of simple proportional representation. These representatives shall be elected two months after the most representative primary trade union organisation of the employees has been notified, which shall appoint the Election Committee responsible for conducting the elections for the election of the employees' representatives to the Board of Directors. The procedure of the elections, the designation of the local Election Committees, the time and details of the voting as well as the extraction and announcement of the results are the task of this Committee and the Bureau is appointed in accordance with the provision of article 1 of Law 1264/1982 as currently in force. Furthermore, the Board of Directors consists of 2 representatives of the minority shareholder, who holds 35% of the company's share capital, in accordance with the provisions of Article 79 of Law 4548/2018 and Article 11 par. 2 of the Articles of Association of DEPA.

Finally, at DEPA Commercial, the Board of Directors of the company consists of 2 women and one of them is a representative of the employees of DEPA Commercial, respecting the provision of equal opportunities for advancement and progress regardless of gender, age, social stratification, religious or sexual orientation.

## Responsibilities of Board members

The Board of Directors, as the supreme management body of the company, has full control and responsibility for the operation and management of the activities of DEPA

Commercial in accordance with Article 10 of the Company's Articles of Association, which provides for the following: The Board of Directors is the supreme representative, and management and administrative body of the Company and primarily formulates its strategy and development policy, while it supervises and controls the management of the Company's assets.

The Board of Directors represents the company, is competent to decide on any act and to exercise any power relating to the management of the company, the management of its assets and generally the pursuit of its object, without any limitation, except for those matters which by law or the Articles of Association are expressly subject to the competence of the General Meeting.

The Board of Directors elects from among its members the Chair, the Vice-Chair and the CEO. The position of Chair or Vice-Chair of the Board of Directors may coincide with that of the CEO. With the exception of specific delegations by the Board of Directors to another Board member, as defined in paragraph 6 of this Article, the CEO shall head all the offices of the Company, direct their work, take the necessary decisions within the framework of the provisions governing the operation of the company and submit for approval to the Board of Directors of the Company the proposals and recommendations required for the implementation of the Company's objectives.

The Board of Directors approves the annual budget of the company and prepares the Annual Activity Report.

The Board of Directors, on the proposal of the Chair or the CEO, appoints the General Directors of the Company and determines their responsibilities and/or their remuneration.

The Board of Directors may delegate the exercise of part of its powers or responsibilities, other than those requiring collective action, as well as

the administration, management or coordination of the affairs or representation of the Company to the Chair, Vice- Chair, CEO, one or more of its members, the General Directors, Directors or employees of the Company or to third parties. In addition, the Board of Directors may delegate specific responsibilities, including administration, management and coordination, for specific matters, by special contracts to domestic or foreign natural or legal persons, who will exercise the responsibilities and provide the services specified in the relevant decisions of the Board of Directors of the company.

In accordance with the above, the BoD has delegated part of its powers/responsibilities by Decision no. 1415/2/20.05.2021.

## Role of the BoD in sustainability issues (ESG)

GRI 2-12

GRI 2-13

GRI 2-17

According to Art. 4548/2018 concerning *societate anonime*, the role of the supreme governance body is defined by the conjunction of the following provisions:

a) Art. 86 par. 1: "The board of directors shall be competent to decide on all acts relating to the management of the company, the management of its assets and the general pursuit of its object.", and

b1) Art. 150 par. 2(c) on the annual management report of the Board of Directors, which requires all *societate anonime*, except small ones, to include an analysis that includes both financial and, where appropriate, non-financial key performance indices related to a specific business area, including information on environmental and labour issues, The obligations arise from the incorporation of Directive 2014/95/EU into Greek law.

The members of the Board of Directors have the experience and skills necessary to address the individual environmental, social

and governance (ESG) issues that arise within DEPA Commercial. It is worth noting that they also have considerable experience in social issues such as labour practices. The members of the Board of Directors are responsible for setting sustainability priorities and goals and for monitoring and evaluating sustainability performance to ensure the sustainable development of DEPA Commercial. The Board of Directors also oversees due diligence and other procedures to identify and manage the company's impact on the economy, the environment and people (including human rights).

To verify the above, it is worth mentioning some of the responsibilities of the Board of Directors in matters of Corporate Social Responsibility. In the context of the actions of Corporate Social Responsibility, i.e. the "responsibility of enterprises for their impact on society" or the "contribution of enterprises to society as a whole, through the systematic and mainly voluntary integration in their operation of activities that have a social, environmental and cultural dimension", these issues are included as an activity in the power of the supreme management bodies which are competent for the "day-to-day" handling of corporate affairs and governance. This fact proves the real interest of the Board of Directors in ESG issues.

The Board of Directors has delegated the responsibility for managing these issues to the CEO, who in turn delegates the responsibility to the relevant Directors of DEPA Commercial, in order for the company to cope with any ESG challenges that may arise.

# Corporate Organisational Chart

GRI 2-9

GRI 2-11



## Operational Organization

Regarding the Operational Organisation, since 2020 a new organisational unit, the "Operational Organisation Project Office" has been established. This unit was created to improve the Company's operation and to ensure the maximum performance of its organisational structures. Its ultimate purpose is to identify all possible opportunities to improve the company's operation and take actions to implement them.

As part of the development of the operational organisation, in cooperation with the Financial Services, an Administrative Information application was developed for the Management Team of DEPA Commercial. In particular, a set of graphs and indices was developed including the main figures of the company's business operation and presenting them in a concise and easy-to-understand way, while giving the opportunity to further delve into the details of individual figures. It is worth noting, however, that the project is currently in the test run phase and is expected to be implemented in 2022. In addition, the extension of the project to the individual Directorates of the company is planned for the Management Information of all executives with the appropriate reports and indices.

Finally, during the development of the operational organisation, a set of reports on Human Resource issues and more specific indices were created to monitor this function of DEPA Commercial.

## Internal Audit Directorate

The Internal Audit Directorate of DEPA Commercial operates as an independent, impartial, assurance and advisory entity, designed to add value and improve the company's operations. In addition, it contributes to the achievement of DEPA Commercial's objective targets by adopting a systematic, professional approach to evaluating and improving the effectiveness of risk management procedures, internal audit systems and corporate governance.

The objective of the Internal Audit Directorate is to provide specialised and high quality services to the management through the evaluation of the adequacy and effectiveness of the organisation's audit mechanisms and the provision of improvement proposals regarding the audit mechanisms in place.

In order to ensure transparency, quality and effectiveness of its work, the Internal Audit Directorate has adopted the following documents:

Internal Audit Charter

Code of Professional Conduct and Ethics

Internal Audit Procedures Manual

At the same time, the Internal Audit Directorate reports to the Audit Committee, for which information is provided below.

## Audit Committee **GRI 2-16**

On order to ensure the independence and full transparency of the Internal Audit Directorate's operation, as well as to identify and avoid potential risks to the accuracy and reliability of the financial information and to ensure its validity, the operation of the Department is supervised by an Audit Committee which has been established by the Board of Directors of the Company and which includes non-executive members of the Board of Directors. In fact, the Board of Directors appoints the Chair and the Members of the Audit Committee, which must be at least three and no more than six non-executive members. Essentially, through the Audit Committee, the Board of Directors ensures the adequate and effective operation of the Company's Internal Audit System. The internal audit is carried out annually by the Internal Audit Directorate with the support of an independent external consultant.



The Audit Committee informs and supports the BoD in exercising its oversight responsibilities with regard to

1) the financial reporting procedure, 2) the internal audit system, 3) the audit procedure and 4) the company's procedure for monitoring compliance with the regulatory and legislative framework and the Code of Conduct.

For the above purposes, the Audit Committee shall inform the BoD on a regular basis on the progress of its work, as well as on any issues that arise.

For the year 2021, the Audit Committee's audit work was completed in accordance with the approved Audit Plan and no deviations were reported. At the same time, the Internal Audit Directorate monitored the progress of the implementation of the corrective action plan for the audit findings.

Therefore, the Audit Committee is an important support for the management of DEPA Commercial and helps to ensure its sustainability and growth under conditions of full transparency and independence.

## Corporate conduct committee

The Corporate Conduct Committee of our company is the guardian of the Code of Professional Conduct and Ethics of DEPA Commercial. The Committee has various responsibilities and consists of: the Director of Human Resources, the Director of Legal Affairs, the Director of Internal Audit as well as a representative of the company's Employees' Association and an additional representative appointed by decision of the Chairman of the Board of Directors (any change in its composition is decided by the Board of Directors of the Company).

Typically, it is tasked with:

- Providing instructions and clarifications on the implementation of the Code
- Receives reports of violations or potential violations of the Code
- Conducting special audits to confirm reports of violations of the Code
- Recommending disciplinary sanctions in cases of proven violations of the Code
- Informing the Board of Directors of the company on this matter
- Identifies areas or procedures that are vulnerable to the occurrence of inappropriate or illegal actions and proposes measures to shield the company
- Recommending improvements or additions to the Code

## Fight against corruption and bribery

GRI 3-3

GRI 205-3

GRI 415-1

GRI 205-2

DEPA Commercial, as a responsible corporate citizen, bears an ethical responsibility to operate with integrity and transparency, to ensure the sustainability of its activities and the natural environment in which it operates and, of course, to respect the principles of Sustainable Development. It is clear that corruption and bribery violate all of the foregoing and can also damage the company's reputation and credibility. Therefore, they have no place in our corporate structure, as our organizational structure is guided by ethical values such as integrity and transparency which under no circumstances are consistent with unethical work practices.

To this end, at DEPA Commercial we strongly support actions to combat practices that are or could potentially jeopardise good governance and our responsible and ethical business practices as a whole. In this context, we operate with integrity, developing rules of conduct and procedures that promote transparency, fight against corruption, and adherence to all regulations and laws regarding the protection of our customers' privacy.

Driven by the fundamental value of professional integrity, 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 fostering a culture of compliance with the law in which corruption and bribery have no place.



Additionally, 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 relevant incidents, effectively promoting the defence of transparency and integrity which are its fundamental values.

- The Company supports the effort to ensure integrity and transparency in the wholesale natural gas market regulated by the EU Regulation 1227/2011 («Regulation on wholesale energy market integrity and transparency», known as «REMIT»). Therefore, it complies with the above mentioned 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. DEPA Commercial seeks and welcomes only open, transparent and legal actions.

- The Company does not accept and does not allow its Management members, its executives, employees and associates to provide any service, amount of money or any other benefit of value to a third official or private employee, with the aim of influencing them to inappropriately perform their professional duties or to maintain business activities or to secure an unfair business advantage

- The company refrains from any funding of political activities in order to ensure full transparency of its operations. The Internal Audit Directorate is the competent division, which in turn is supervised by the Audit Committee made up of members of the Board of Directors

- Audits are carried out in Financing, Contract Management, as well as Project Support and Management, Designs and Special Corporate Development Projects, Antitrust Law Compliance, Gas Sales, Commercial and Pricing Policy, Planning on Implementation of Corporate and Social Responsibility Programmes

- The environment in which the Company operates is analysed 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.

- 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. Checks are carried out systematically ensuring the proper selection of suppliers, the accuracy of payments and their corresponding registration and recognition in the Company's accounting records.

Bribery is defined as the acceptance of any item with a value of more than €50 for the purpose of influencing a decision or providing an unfair advantage. Of course, accepting gifts does not only involve acceptance of cash. Receiving luxury gifts and products, scholarships, tickets to sporting events, jewellery or precious stones are also considered as acts of 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 duty payment 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 associates. Thus, in accordance with the Gift Policy of the company any members of the Management Team, executives, employees, associates and in general those who provide services to the Company, as well as their spouses and relatives up to the second degree are not allowed to receive any kind of gift or item with a value higher than €50 from the Company's competitors,

suppliers, customers or associates. 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 associate is in doubt about accepting a gift from a potential supplier/partner or customer, they should discuss it with their supervisor or the Corporate Conduct Committee

It is worth mentioning that for the year 2021, 162 of our staff (executives, administrative and technical staff) received thorough training on the issues of combating unethical professional behaviour, such as corruption and bribery.

Anti-corruption and anti-bribery training		
Category of staff	Number of people trained on anti-corruption and anti-bribery issues	Percentage
Management Staff (total 34)	28	82.35 %
Administrative Staff (total 121)	113	93.38 %
Technical Staff (total 32)	21	65.63 %
TOTAL (187 people in the workforce)	162 people trained of 187	86.63 %

Moreover, 100% of the members of the Company's supreme 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. Also, all staff members have been fully informed about all matters included in the company's Corporate Conduct and Ethics Code. In addition, when a new employee joins DEPA Commercial, an extensive briefing is provided by the Human Resources Division on issues related to the Code of Corporate Conduct and Ethics. For the information of all stakeholders, the relevant anti-corruption policies and procedures are posted on the company's website.

It is noteworthy that, for the year 2021, DEPA Commercial did not record any incidents of corruption and any incidents of bribery. Also, there was no complaint for any negative impact of the company on society.

## Conflict of interest

GRI 2-23

GRI 2-15

A conflict of interest exists when the personal interests of an executive, employee or partner of a company may directly or indirectly compete with the interests of the company itself. Indeed, such a conflict may not be easily perceived, due to confusion or doubt. Therefore, any event that may affect our ability to provide an impartial and unbiased professional opinion is a conflict of interest for our company.

Typical examples of conflicts of interest are:

1. When any employee, partner, executive or member of the Management Team (or a member of their family) engages in any investment, acquiring a significant financial interest in the profits of a competitor, customer or supplier of DEPA Commercial and at the same time their position in the company is such that their ability to provide impartial and unbiased knowledge to the company may be affected in the interest of such investment;
2. When any employee, partner, executive or member of the Management Team or a member of their family receives any improper benefits because of their position in the company;
3. When any employee, partner, executive or member of the Management Team or a member of their family uses the information, assets and resources of DEPA Commercial for their personal benefit or the benefit of another person;
4. When any employee, partner, executive or member of the Management Team conducts work or provides assistance to any third party in a way that affects their performance or judgment in the company; When any employee, partner, executive or member of the Management Team negatively affects the reputation of DEPA Commercial and its relations with third parties by their action.

At DEPA Commercial, all of us must be aware of and comply with the relevant company Policy, which is applicable in all cases of conflict of interest, and inform the Corporate Conduct Committee in writing if our spouse or relatives up to the second degree engage in any kind of financial transactions or activities with DEPA Commercial.

Regarding the conflict of interest that may arise between the members of the Board of Directors, it is largely prevented, as according to the explicit reference made in Article 14 of the Articles of Association of DEPA S.A.:

"It is prohibited for the members of the Board of Directors, the General Directors, the Directors of the company, as well as the staff of the company, to perform on occasion or professionally without the specific authorisation of the General Meeting of the company's shareholders, for their own account or for the account of third parties, any acts within the objectives of the company or be members of the Board of Directors, directors, employees or representatives of companies with a similar object to that of the company, as well as to participate as sole shareholders or partners in personal or other forms of companies, joint ventures that have a similar object to that of the company".

However, the above prohibitions do not apply to positions held by the above people in subsidiaries of the company or companies in the capital of which the company has an interest.

In particular, the members of the Board of Directors of the company, who are appointed by the minority shareholder, may be members of the Board of Directors, directors, employees or representatives of companies that have a similar object to that of the company without the authorisation of the General Meeting of shareholders, provided that the aforementioned legal entities or joint ventures do not engage in activities that compete with the company's activities in the sectors of supply and trading of natural gas (in gaseous or liquid form) and electricity.

For the year 2021, no conflict of interest issues were recorded within our company.

## Remuneration policy

GRI 2-19

GRI 2-20

In DEPA Commercial there is no defined remuneration policy for the members of the Board of Directors, as their remuneration is approved annually by the Annual General Meeting, in accordance with Law 4548/2018.

## Transparency and Legislative Compliance

GRI 3-3

It is a matter of fundamental importance that our company fully complies with the regulatory, legislative and regulatory framework of Greece, the European Union and the international community as a whole. Due to the industry in which we operate, compliance with the Regulations and the respective Directives is a given for the smooth conduct of our activities. Therefore, at DEPA Commercial we are committed to strictly and in full compliance with the current legal framework of the energy sector.



## 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 Implementing Regulation 1348/2014.

In this respect, DEPA Commercial operates in full compliance with the provisions of the current legislative and regulatory framework, regarding the supply and sale of natural gas and its participation in the EU internal gas market, under the supervision of the Regulatory Authority for Energy (RAE). In the context of the company's strategy to expand its activities and transform it from a natural gas company into a vertically integrated energy company with diversified activities providing a combination of energy products and services, DEPA Commercial submitted in November 2020 an application to RAE for an Electricity Supply License, which was granted by the RAE Decision no 250/2021 dated 16.04.2021. At the same time, on 30.09.2021, DEPA Commercial obtained a license to supply natural gas to Bulgaria.

The company continued to be informed in a timely manner regarding regulatory developments at the European and national level, and kept communicating with RAE for the formation of the regulatory framework and the fulfillment of the obligations arising from it.

## Regulatory Compliance

GRI 2-25

GRI 2-27

GRI 206-1

Compliance with the regulatory and legislative framework is of paramount importance to DEPA Commercial, as it ensures, among other things, its lawful operation and good governance, reflects its excellent professional reputation and helps to achieve its overall strategic objectives.

DEPA Commercial complies continuously with the legislation and adheres to the provisions of the national and European complex regulatory framework concerning the natural gas market, a resource of strategic importance both at European and global level.

Thus, 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 Regulatory Authority for Energy (RAE). Planning, coordination and implementation of the company's compliance strategy in the ever-changing regulatory framework are considered a key priority. In parallel, the company supports through its activities, mainly in natural gas, the commitments of the country to adopt measures regarding the achievement of targets in addressing climate change by adjusting its strategy accordingly in order to maintain its sustainable course.

Certainly, adherence to the law not only prevents the imposition of fines against the company, but mainly 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 Affairs Division for clarification. Moreover, all Company executives must guide and explain to their subordinates the rules of legislation, the business and antitrust law. Furthermore, they must report to the Corporate Conduct Committee any cases of non-compliance and indicate the areas where internal rules can be improved to ensure the Company's more effective operation.

In addition, the company had no claims for the reference year regarding antitrust and anticompetitive behaviour.

## Code of Professional Conduct and Ethics

GRI 2-23

GRI 2-24

Commitment to the principles of integrity, transparency, fairness, professionalism, team spirit and respect for the rules is a fundamental rule that governs the operation of the company. Incidents of misconduct (e.g. fraud, corruption, bribery, embezzlement, theft, money laundering, falsification of financial reports, unfair competition, discrimination in the workplace, violation of human rights or any attempt to cover up any of the above) could have an adverse effect on the company's financial position, reputation and credibility in the market and could lead to involvement with the authorities, sanctions and restriction of the company's business operations.

In order to avoid such misconduct and any legal or other consequences for the company and its staff, the Management has adopted and applies a Code of Professional Conduct and Ethics. The Code of Business Conduct and Ethics is a key tool for DEPA Commercial, as it communicates to its stakeholders all the principles and value system that define it as unique in its industry. The Code is published and easily accessible on our company website <https://depa.gr/eteriki-diakyvernisi-8/>.

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 wishes to operate, and to be the guide for the daily professional conduct 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 Rules of Procedure for Work, as well as the Code of Compliance with the Rules of Antitrust Law.

All members of each of the company's governance bodies, as well as employees and internal or external partners of the company, are kept informed of this Code at all times. Also, when a new employee/partner joins DEPA Commercial, an extensive briefing is given by the Human Resources Division on issues related to the Code of Corporate Conduct and Ethics. The Code is permanently posted on the company website and the central home page of the internal communication system MyWorkplace, along with other relevant texts, such as the Code of Compliance with Rules of Antitrust Law. Finally, employees and associates are frequently reminded of the Code through electronic communications (most recently on 1 September 2021) and training seminars. A new relevant seminar is planned in the future, on the occasion of the adoption of the new Policy on the Prevention and Combating of Violence and Harassment (under preparation, to be adopted in 2022).

## Corporate Governance Code

GRI 2-23

GRI 2-24

DEPA Commercial voluntarily complies with the Greek Corporate Governance Code (June 2021 edition) of the Hellenic Corporate Governance Council (GCC) for Listed Companies, even though it is not legally obliged to do so as it is not a Listed Company. The Corporate Governance Code follows a "comply or explain" approach, i.e. it requires listed companies that opt to apply the Code, to disclose this intention and either comply with the specific practices of the Code or explain the reasons for non-compliance with some of these practices. The central objective of the Code is to create an accessible and understandable reference guide, which sets out in a codified manner in a single text, high standards and specifications for corporate governance.

With this in mind, the company seeks to apply the best practices resulting from the existing legislation and, in particular, the above Code, paying particular attention to the disclosure of individual issues of Corporate Governance.

In this context, it has established in recent years the position of Corporate Secretary with responsibilities that include, among others, the assurance of a good flow of information between the Board of Directors and its committees, as well as between the Board of Directors and the company's organisational and administrative structures. Their duties include ensuring the effective organisation of the General Meeting and the generally good communication between the company's shareholders and the Board of Directors.

## Information and Information Systems Security

It is imperative for a modern company to be able to safeguard in the most effective way possible both the personal data of its customers and partners, as well as its own confidential files and information. In this regard, every effort is made to protect data against loss, misuse, unauthorised access, disclosure, alteration or destruction by taking appropriate technical and organisational measures. Any leakage or mismanagement of such critical data is prevented within our company, thanks to our Information Systems Proper Use and Conduct Policy.

Specifically, our executives, employees and partners who have access to information and files of DEPA Commercial, such as presentations, emails, documents, technical drawings, maps, databases, videos, recorded conversations, etc., must manage them with care, ensuring their proper use and protection and not disclose to third parties their access code. Furthermore, with regard to the records other than in electronic form, i.e. records also kept in paper form, stored in the specially designed office areas, it is clear and fully understood that no destruction or falsification of any file or document of the company can be made without the approval of the supervisor or the competent executive in each case. Additionally, it is provided that the staff of DEPA Commercial must be on standby when the issue of retrieval of records for audit purposes arises at the request of any Authority.

It should be noted that all DEPA Commercial staff are aware of and apply the company's Information Systems Proper Use and Conduct Policy.

## Protecting Confidential Information and Personal Data

GRI 418-1

In today's world, data has become a valuable asset for companies, as it provides valuable information that can help them make informed decisions that improve their operations. However, the growth of data also implies the need for strong data protection within a corporate framework. It is a vital priority for companies to ensure that their data protection practices are strong and effective in order to help protect the personal data of their employees, customers, suppliers, partners and to ensure good corporate governance on the part of the company handling the data.

At DEPA Commercial, the Code of Professional Conduct and Ethics binds those who, by virtue of their position in the company, manage or have access to confidential information to protect it and not to use, exploit or disclose it. This information includes, but is not limited to, pricing information as well as customer lists. It is not permitted to use inside information for one's own financial benefit, or to disclose it to another, friendly or related person or associate, and in general to any person not authorised to have knowledge of it, in order to make any investment decision. DEPA Commercial also prioritises the protection and proper use of the personal data of members of the Management Team, executives, employees, partners, customers, suppliers, shareholders and any natural persons who deal directly or indirectly with the company. To this end, it has adopted a Personal Data Protection Policy that binds its current and former employees, which distinguishes the categories of data subjects, the categories of data processed, the recipients

of the data, the sources from which the data are obtained, the purposes and legal bases of the processing, as well as a reference to the rights of the data subjects. In addition, DEPA has adopted a privacy policy for users/visitors to its website, a procedure for handling requests from personal data subjects that sets out the roles and responsibilities of those responsible and describes the procedure for assessing the severity of each incident, while it has appointed a Data Protection Officer (DPO), without being legally obliged to do so. In 2021 there were no incidents of data breaches and no fines.

# GRI Table of Contents

Statement of Use	DEPA Commercial S.A. has drafted the Sustainable Development Report in accordance with the GRI Standards for the period 01/01/2021-31/12/2021
GRI 1 used	GRI 1: Foundation 2021
GRI Sector standards applied	GRI 11: Oil and Gas Sector 2021



GRI	Disclosure	Section in the Report	Page	Omission/ Reason for Omission	GRI Sector Standard
GRI 2: General Disclosures 2021	2-1 Organizational details	Company Profile, Activities of the Company, Shareholder Structure	10-11 11 12		
	2-2 Entities included in the organization's sustainability reporting	Shareholder Structure Scope of Reporting and time period covered by the Report	12 32-33		
	2-3 Reporting period, frequency and contact point	Scope of Reporting and time period covered by the Report, Contact	32 33		
	2-4 Restatements of information	Scope of Reporting and time period covered by the Report Materiality Analysis	32-33, 39		
	2-5 External assurance	The company has not received external assurance	-		
	2-6 Activities, value chain and other business relationships	Company Profile Company activities Supply Chain and Related Figures	10-11 11 14-15	biii. The downstream entities of the organisation and their activities. / N/A. No information available	
	2-7 Employees	Employment	69-71		
	2-8 Workers who are not employees	Employment	69		
	2-9 Governance structure and composition	Composition of the Board of Directors, Company Organisation Chart	92-94 96-97	iv. number of other significant positions and obligations of each member, and the nature of those obligations. / Confidential Information. This information may not be shared  vi. unrepresented social groups / N/A. No information available	

GRI	Disclosure	Section in the Report	Page	Omission/ Reason for Omission	GRI Sector Standard
GRI 2: General Disclosures 2021	2-10 Nomination and selection of the highest governance body	Composition of the Board of Directors	92		
	2-11 Chair of the highest governance body	Composition of the Board of Directors Company Organisation Chart	92 96		
	2-12 Role of the highest governance body in overseeing the management of impacts	Role of the BoD in Sustainability Topics (ESG) Stakeholders Materiality Analysis	95-96 33 36		
	2-13 Delegation of responsibility for managing impacts	Role of the BoD in Sustainability Topics (ESG)	95-96		
	2-14 Role of the highest governance body in sustainability reporting	Materiality Analysis	36		
	2-15 Conflicts of interest	Conflict of Interest	102-103		
	2-16 Communication of critical concerns	Respect for Human Rights and Equal Opportunities Audit Committee	88 97-98		
	2-17 Collective knowledge of the highest governance body	Role of the BoD in Sustainability Topics (ESG)	95		
	2-18 Evaluation of the performance of the highest governance body	N/A		N/A. The company does not apply specific procedures	
	2-19 Remuneration policies	Remuneration Policy	103	N/A / No Remuneration Policy	
	2-20 Process to determine remuneration	Remuneration Policy	103	N/A / No Remuneration Policy	
	2-21 Annual total compensation ratio	Employment	69		
	2-22 Statement on sustainable development strategy	Message from the Chairman	6-7		



GRI	Disclosure	Section in the Report	Page	Omission/ Reason for Omission	GRI Sector Standard
GRI 2: General Disclosures 2021	2-23 Policy commitments	Respect for Human Rights and Equal Opportunities Conflict of Interest Code of Professional Conduct and Ethics Corporate Governance Code	88 102-103 105 106		
	2-24 Embedding policy commitments	Respect for Human Rights and Equal Opportunities Code of Professional Conduct and Ethics Corporate Governance Code	88 106 105		
	2-25 Processes to remediate negative impacts	Respect for Human Rights and Equal Opportunities Regulatory Compliance	89 106		
	2-26 Mechanisms for seeking advice and raising concerns	Respect for Human Rights and Equal Opportunities	88		
	2-27 Compliance with laws and regulations	Product and Service Warranty Protection of the Natural Environment and Biodiversity Respect for Human Rights and Equal Opportunities Regulatory Compliance	17 58-60  88-89 104		
	2-28 Membership associations	Interests - Partnerships	24		
	2-29 Approach to stakeholder engagement	Stakeholders	33-34		
	2-30 Collective bargaining agreements	Employment	69		
GRI 3 Material Topics 2021	3-1 Process to determine material topics	Materiality Analysis	36-39		
	3-2 List of material topics	Materiality Analysis	36-39		
	3-3 Management of material topics	Materiality Analysis	36-39		

GRI Standard	Disclosure	Section in the Report	Page	Omission/ Reason for Omission	GRI Sector Standard
<b>Material Topics</b>					
<b>Environment</b>					
<b>Energy Management &amp; Greenhouse Gas Emissions</b>					
GRI 3: Material Topics 2021	3-3 Management of material topics	Energy Management & Greenhouse Gas Emissions	44, 49		11.1.1
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Energy Consumption	46-47		11.1.2
	302-2 Energy consumption outside of the organization	Energy Consumption	46-47		11.1.3
	302-3 Energy intensity	Energy Intensity Index	48		11.1.4
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Greenhouse Gas Emissions	44-45		11.1.5
	305-2 Energy indirect (Scope 2) GHG emissions	Greenhouse Gas Emissions	44-45		11.1.6
	305-4 GHG emissions intensity	Greenhouse gas emission intensity index	46		11.1.8
<b>Adaptation to Climate Change and Transition to Clean Energy</b>					
GRI 3: Material Topics 2021	3-3 Management of material topics	Adaptation to Climate Change and Transition to Clean Energy	49-50		11.4.1 11.14.1
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	2021 Significant Events	18-19 51-53 86-87		11.14.4
GRI 304: Biodiversity 2016	304-2 Significant impacts of activities, products and services on biodiversity	Environmental Impact Protection of the Natural Environment and Biodiversity	57-58 58-62		11.4.3

GRI Standard	Disclosure	Section in the Report	Page	Omission/ Reason for Omission	GRI Sector Standard
Waste Management					
GRI 3: Material Topics 2021	3-3 Management of material topics	Waste Management	63		11.5.1
GRI 306: Waste 2020	306-2 Management of significant waste-related impacts	Waste Management	63-64		11.5.3
	306-3 Waste generated	Waste Management	63-64		11.5.4
Water Management					
GRI 3: Material Topics 2021	3-3 Management of material topics	Water Management	64-65		11.6.1
GRI 303: Water and Effluents 2018	303-5 Water consumption	Water Management	64-65	<p>b. Total water consumption from all water scarce areas, measured in megalitres.</p> <p>c. Change in water storage, measured in megalitres, if water storage is identified as having significant water-related impacts.</p> <p>d. Any contextual information necessary to understand how the data were collected, such as standards, methodologies and assumptions used, including how they were calculated, estimated, modelled or derived from direct measurements, and the approach adopted, such as the use of any sectoral factors.</p> <p>N/A. No information available</p>	11.6.6

GRI	Disclosure	Section in the Report	Page	Omission/ Reason for Omission	GRI Sector Standard
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<b>Emergency Plans and Occupational Health and Safety</b>					
GRI 3: Material Topics 2021	3-3 Management of material topics	Emergency Plans and Occupational Health and Safety	76-78		11.9.1
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health & safety management system	Health & Safety Management System	77-78		11.9.2
	403-2 Hazard identification, risk assessment, and incident investigation	Health & Safety Policy Health & Safety Management System Risk Identification and Incident Investigation	76-79		11.9.3
	403-3 Occupational health services	Health & Safety of employees during the COVID-19 pandemic	82-84		11.9.4
	403-4 Worker participation, consultation, and communication on occupational health and safety	Health & Safety Management System	77-79		11.9.5
	403-5 Worker training on occupational health and safety	Health and Safety Training	80		11.9.6
	403-9 Work-related injuries	Employee Health & Safety indices	84		11.9.10
	403-10 Work-related ill health	Employee Health & Safety indices	84		11.9.11

GRI	Disclosure	Section in the Report	Page	Omission/ Reason for Omission	GRI Sector Standard
<b>Working Practices</b>					
GRI 3: Material Topics 2021	3-3 Management of material topics	Working Practices	69, 73		11.10.1
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Employee Benefits	73		11.10.3
	401-3 Parental leave	Employee Benefits	73		11.10.4
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Employee Training	74		11.10.6
	404-2 Programs for upgrading employee skills and transition assistance programs	Employee Training	74-75		11.10.7
	404-3 Percentage of employees receiving regular performance and career development reviews	Employee Evaluation	75		
<b>Respect for Human Rights &amp; Equal Opportunities</b>					
GRI 3: Material Topics 2021	3-3 Management of material topics	Respect for Human Rights and Equal Opportunities	88-89		11.11.1
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Respect for Human Rights and Equal Opportunities	89		11.11.7
<b>Relations with Society</b>					
GRI 3: Material Topics 2021	3-3 Management of material topics	Relations with Society	85-86		11.14.1 11.21.1
GRI 201: Economic performance 2016	201-1 Direct economic value generated and distributed	Company Key Financial Figures	13		11.21.2
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Supply Chain and Related Figures	15		11.14.6

GRI Standard	Disclosure	Section in the Report	Page	Omission/ Reason for Omission	GRI Sector Standard
<b>Corporate Governance</b>					
<b>Fight against Corruption and Bribery</b>					
GRI 3: Material Topics 2021	3-3 Management of material topics	Fight against Corruption and Bribery	99-102		11.20.1 11.22.1
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	Fight against Corruption and Bribery	101		11.20.3
	205-3 Confirmed incidents of corruption and actions taken	Fight against Corruption and Bribery	102		11.20.4
GRI 415: Public Policy 2016	415-1 Political contributions	Fight against Corruption and Bribery	100		11.22.2
<b>Transparency and Legislative Compliance</b>					
GRI 3: Material Topics 2021	3-3 Management of material topics	Transparency and Legislative Compliance	103-107		11.19.1
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Regulatory Compliance	104		11.19.2
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Protection of Confidential Information and Personal Data	107		

Issues in the current Sector GRI designated as non-material

Atmospheric emissions	These issues are not representative or substantive regarding the operation of the organisation and are therefore not included in the report.
Rights to use land and natural resources	
Rights of indigenous peoples	
Conflict and safety	
Public policy	
Shutdown and Restoration	





**DEPA Commercial S.A.**



