

DEPA COMMERCIAL S.A. (DEPA S.A.)

Annual Separate and Consolidated Financial Statements for FY from 1 January 2022 to 31 December 2022 in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union

(TRANSLATED FROM THE GREEK ORIGINAL)

The accompanying Annual Separate and Consolidated Financial Statements were approved by the Board of Directors of DEPA COMMERCIAL S.A. on 02 August 2023

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I. COMPANY INFORMATION

Board of Directors:	Ioannis Papadopoulos – Chairman of BoD Konstantinos D. Xifaras – CEO Iordanis Prokopidis – Vice Chairman of BoD Panagiotis Dimitropoulos – Member of BoD Dimitrios Samolis – Member of BoD Pavlos Kamaras – Member of BoD Dimitrios Manolis, Member of BoD Representative of DEPA employees (from 01/12/2022) Evaggelos Kosmas, Member of BoD Representative of DEPA employees Marica Labrou – Member of BoD Dimitrios Skalaios – Member of BoD Asimakis Fotopoulos – Member of BoD
Other members of BoD for the year:	Eleni Zilakaki – Member of BoD Representative of DEPA employees (up to 30/11/2022)
Registered office:	92 Marinou Antipa Street & 37 Papaioannou 141 21 Iraklio Attikis
Registration Number:	17913/01AT/B/88/592(07)
GEMI (General Electronic Commercial Registry):	000556901000
Auditing Firm:	Grant Thornton S.A. 58 Katechaki Str 115 25 Athens Greece

II. BOARD OF DIRECTORS MANAGEMENT REPORT CORPORATE YEAR 1.1.2022-31.12.2022

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ATTACHMENT

DEPA COMMERCIAL Group and Company Financial Ratios

I. DEPA COMMERCIAL S.A. GROUP AND COMPANY

1. Introduction

The current report of the Board of Directors concerns the period of twelve months of the closing financial year (01.01.2022-31.12.2022). The Report has been prepared according to the relative provisions of Article 150 of Law 4548/2018 as effective. The Consolidated and Separate Financial Statements have been prepared in accordance with the International Financial Reporting Standards (I.F.R.S.), as adopted by the European Union.

The current report describes financial information and results of DEPA COMMERCIAL Group and Parent Company DEPA COMMERCIAL S.A. (hereinafter referred to as "DEPA S.A." or "DEPA" or "DEPA COMMERCIAL", or "the Company") the most significant events that took place during the current financial year, provides a description of the main risks and uncertainties, the Group and Company might be faced with during the next financial year, as well as qualitative data and estimates for the development of the Company's and the Group's operations in the following financial year.

2. Structure

The structure of DEPA COMMERCIAL Group during the reporting period (1 / 1-31 / 12/2022) was as follows:

Parent Company

Hellenic Republic Asset Development Fund (HRADF) and Hellenic ENERGY Holdings S.A. (former title Hellenic Petroleum Holdings S.A.) hold participating interests in DEPA COMMERCIAL S.A. of 65% and 35% respectively.

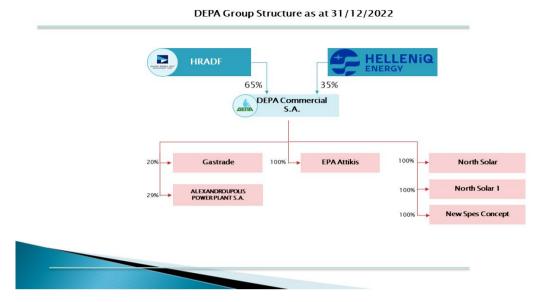
DEPA COMMERCIAL S.A. Subsidiaries

- NATURAL GAS HELLENIC ENERGY COMPANY (shareholder 100% DEPA Commercial S.A.)
- NORTH SOLAR SA (until 05.10.2022 DEPA owned 49% and from 06.10.2022 DEPA owns 100%)
- NORTH SOLAR 1 S.A. (from 12.08.2022 shareholder 100% of DEPA Commercial S.A.)
- NEW SPES CONCEPT S.A. (from 11.04.2022 shareholder 100% of DEPA Commercial S.A.)

Jointly controlled entities & Associates

• GASTRADE S.A. (shareholder 20% DEPA Commercial S.A.)

• ALEXANDROUPOLIS POWER PLANT S.A. (from 20.12.2022 shareholder 29% DEPA Commercial S.A.)



3. DEPA COMMERCIAL Group Financial Results

The General Meeting of Shareholders of DEPA Commercial held on 29th June 2007 approved the preparation of the Annual Financial Statements of DEPA Commercial & the Group based on the International Accounting Standards (IAS) adopted by the European Union.

According to IFRS, DEPA Commercial Group financial data for the FY 2022 are as follows:

3.1. The Group's Financial Data (€)

	THE GROUP	
	31/12/2022	31/12/2021
1. STATEMENT OF COMPREHENSIVE INCOME		
-Turnover (sales)	4.826.555.042	1.696.903.819
-Gross profit	176.067.766	282.726.131
-Operating Profit	70.043.344	332.850.138
-Profit before tax	75.965.869	340.353.374
-Profit after tax from continuing operations	49.568.088	262.762.182
-Profit after tax from discontinued operations	0	11.305.750
-Profit after tax from continuing and discontinued operations	49.568.088	274.067.932
-Total comprehensive income after tax	54.579.222	262.838.830

	THE GROUP		
2. STATEMENT OF FINANCIAL POSITION	31/12/2022	31/12/2021	
-Total fixed assets	189.749.598	126.700.488	
-Inventory	174.739.718	98.709.042	
-Trade and other receivables	767.720.207	578.183.038	
-Cash and cash equivalents	199.702.349	265.891.965	
TOTAL ASSETS	1.331.911.871	1.069.484.533	
-Total Equity	603.476.221	639.510.501	
-Total long-term liabilities	36.034.749	35.135.607	
-Total short-term liabilities	692.400.900	394.838.425	
TOTAL EQUITY AND LIABILITIES	1.331.911.871	1.069.484.533	

4. DEPA COMMERCIAL Group Objectives and Risk Management Policies

4.1. Financial risk management

The Group is exposed to various financial risks, the most significant of which are: the market risk, which includes foreign currency exchange risk, interest rate risk and price risk, credit risk, liquidity risk and capital risk. The Group's policies, aim at managing the relevant risks, focus on minimizing the negative impact they may have on the financial position and the performance of the Group.

In the beginning of 2022, Russia invaded Ukraine, starting a war that looks set to last. While Europe, just like the entire globe, was recovering from the shock caused by the pandemic, before it could even return to "normality", Europe it had to address the outbreak of completely new, unprecedented conditions worsening economic and social instability. The combination of recent geopolitical developments around Ukraine, along with the ensuing energy crisis, not only maintains but also amplifies the problems identified in the global supply chain as a consequence of the pandemic. High levels of inflation indirectly affect the demand as well.

Nonetheless, after at least a decade and following the path of other central banks led by the USA, the European Central Bank has introduced successive interest rate increases. This increase in interest rates is a central banks' intervention aimed at indirectly controlling the rapid and unrestrained price increases through reducing the demand. The current inflation has some specific features that make it difficult to address. It's mainly characterized by the fact that it is - to a significant extent - linked to the increase in energy prices, as well as food consumption. Therefore, the policy of increasing interest rates, as a tool applied in order to deal with inflation, could push economies into stagflation, featuring slow growth, high unemployment and rising prices.

Thus, estimates of an upcoming recession in the forthcoming period are all the more increasing until the inflation decelerates and private consumption accelerates.

The economic impact of the current crisis on the global economy and businesses in total cannot be estimated with reasonable certainty at this stage. The Management constantly assesses the situation as well as its potential consequences, in order to ensure that the necessary actions are taken to minimize the impact on the Group's

operations in Greece.

The gas market in Greece did not face any supply problem. The Company and the Group supplied their customers as usual.

As aforementioned, the key Group's financial instruments are cash, bank deposits, trade and other receivables and liabilities and bank loans. The Group Management regularly assesses and reviews the relevant policies and procedures related to financial risks management, described below:

4.2. Market risk

Interest rate risk: The Management constantly monitors fluctuations in interest rates and the Group's financing needs.

Exchange rate risk: The Group is exposed to foreign currency risk due to changes in the US dollar exchange rate with respect to the supply of natural gas, which is carried out based on the contracts with foreign suppliers, mainly expressed in U.S. dollars. As at 31/12/2022, if the exchange rate of euro against the U.S. dollar had increased by 10% and all other variables remained unchanged, the results before tax of the current fiscal year of the parent company and the Group would be increased by Euro 15.960 k and respectively the results after tax of the Group for the closing year would be increased by Euro 12.449 k, due to the valuation of purchases and liabilities to suppliers that are mainly expressed in U.S. dollars. Moreover, if the exchange rate of Euro had decreased against the U.S. dollar by 10%, and all other variables remained unchanged, the results before tax of the parent company and the Group would be decreased by Euro 12.449 k, due to the valuation of purchases and liabilities to suppliers that are mainly expressed in U.S. dollars. Moreover, if the exchange rate of Euro had decreased against the U.S. dollar by 10%, and all other variables remained unchanged, the results before tax of the parent company and the Group would be decreased by Euro 19.507 k and respectively the results after tax of the Group for the closing year would be decreased by Euro 15.215 k, due to valuation of purchases and liabilities to suppliers, mainly expressed in U.S. Dollars.

Price risk: The Group is subject to risk from changes in the prices of other competitive products as the cost of natural gas is affected by fluctuations in oil prices and natural gas sale prices are partially regulated compared to competing fuels. The pricing policy of the Group is based on the natural gas supply price.

4.3. Credit risk

Credit risk arises from cash, derivative financial instruments and bank deposits, as well as credit exposure to the Group's wholesale and retail customers.

Credit to customers is in accordance with the Company and the Group's credit policy, and interest is applied on customers if payment deadlines are exceeded.

The Company has a concentration of sales, as approximately 36.21% of its total sales are performed to the Public Power Corporation SA, 11.36% to BulgarGaz, and 8.03% to IRON S.A. ENERGY SERVICES.

The Company's Management monitors, on a regular basis, the financial position of its customers, the size and limits of the credit provided. At the end of the year, Management considered that the credit risk was covered by the collateral and the provisions it deemed necessary at the time, together with the actions undertaken by the Company to provide guarantees and repayment plan by overdue receivables from customers. The most significant credit risk if the counterparties fail to meet their obligations with respect to each category of recognized financial asset is the carrying amount of such receivables as shown in the Balance Sheet less the value of the guarantees and collaterals.

4.4. Liquidity risk

GROUP

Liquidity risk is managed through the availability of sufficient cash available and credit lines with cooperating banks. Existing available unused approved bank credit facilities to the Group is sufficient to address any potential shortage of cash.

The following table gives an analysis of the financial liabilities and liabilities of derivative financial instruments in accordance with their contractual settlement dates.

As at 31/12/2022	Up to 1 year	from 1 to 5 years	Over 5 years
Loans	6.000.000	-	-
Financial liabilities	474.605	1.027.350	3.329
Suppliers & other			
liabilities	628.320.575	-	-
Derivatives	7.900.989	-	-

As at 31/12/2021	Up to 1 year	from 1 to 5 years	Over 5 years
Loans	4.000.000	-	-
Financial liabilities Suppliers & other	965.536	1.294.522	43.484
liabilities	318.065.743	-	-
Derivatives	14.213.593	-	-

COMPANY

As at 31/12/2022	Up to 1 year	from 1 to 5 years	Over 5 years
Financial liabilities Suppliers & other	102.322	135.490	-
liabilities	554.370.892	-	-
Derivatives	132.952	-	-

As at 31/12/2021	Up to 1 year	from 1 to 5 years	Over 5 years
Financial liabilities	558.990	160.208	-
Suppliers & other liabilities	252.804.797	-	_
Derivatives	14.246.318	-	-

4.5 Capital risk management

The Group's capital risk management objective is to ensure the going concern principle, to distribute profits to shareholders and benefits to other stakeholders and to maintain a capital structure which will decrease the cost of

capital.

The capital is reviewed on the basis of a leverage ratio. The ratio is calculated as the net debt divided by the total capital. Net debt is calculated as total liabilities less cash available. The total capital is calculated based on the equity recorded in the balance sheet. In particular:

	GROUP 31/12/2022 31/12/2021		COM	IPANY
			31/12/2022	31/12/2021
Total liabilities	728.435.650	429.974.032	596.666.266	328.183.410
Less: Cash and cash equivalents	(199.702.349)	(265.891.965)	(178.848.526)	(249.224.389)
Net debt	528.733.301	164.082.067	417.817.740	78.959.021
Total Equity	603.476.221	639.510.501	551.468.116	609.963.098
Net debt / Total Equity	87,61%	25,66%	75,76%	12,94%

4.6. Regulatory risk

Contingent amendments to the regulatory and legislative framework, governing the natural gas market, such as implementation of the provisions of European Legislation, implementation of obligations under the decisions of the Energy Regulatory Authority concerning general regulation and operation of the Greek energy market, as well as a possible restructuring or other changes in the Group's operations, as a result of compliance with the effective legal and regulatory framework, may have a significant impact on the Group's and the Company's operation, financial position, operating results and liquidity.

II. DEPA COMMERIAL S.A. (DEPA)

The composition of the BoD is as follows:

Ioannis Papadopoulos – Chairman of the BoD (from 05/09/2019)

Iordanis Prokopidis – Member of the BoD & Deputy Chairman of the BoD (from 20/05/2021)

Konstantinos Xifaras - Chief Executive Officer (from 05/09/2019)

Panagiotis Dimitropoulos – Member of the BoD (from 30/11/2017)

Pavlos Kamaras – Member of the BoD (from 05/09/2019)

Evaggelos Kosmas, Member of the BoD | DEPA Representative of Employees (from 13/04/2019 to 12/10/2021 and from 15/10/2021 following his re-election on 7/10/2021 in the elections for the appointment of new employee representatives of the Company's Board of Directors according to Article 11 par. 2 par. b 'of the Company's Articles of Association)

Marica Lambrou – Member of the BoD (from 08/07/2020)

Dimitrios Manolis – Member of the BoD | DEPA Representative of Employees (from 1/12/2022 following his election on 28/11/2022 in the elections for the appointment of a new representative of employees in the Company's Board of Directors according to Article 11 par. 2 b' of the Company's Articles of Association. The elections were held since Ms. Eleni Zilakaki left the Company and withdrew from her position as a member of the Board of Directors/ Representative of Employees)

Dimitrios Samolis – Member of the BoD (from 05/09/2019)

Dimitris Skalaios – Member of the BoD (from 08/07/2020)

Asimakis Fotopoulos – Member of the BoD (from 08/07/2020)

Other members of the BoD during the year:

Eleni Zilakaki, Member of the BoD | DEPA Representative of Employees (from 13/04/2019 to 12/10/2021 and from 15/10/2021 following her re-election on 7/10/2021 in the elections for the appointment of a new representative of employees in the Company's Board of Directors according to Article 11 par. 2 b' of the Company's Articles of Association. On 30/11/2022, Eleni Zilakaki left the Company and withdrew from her position as a member of the Board of Directors/ Representative of Employees).

1. Significant events in 2022.

- Rapid increase in international gas prices that started in mid-2021 was further aggravated by Russia's invasion in Ukraine and the subsequent supply problems in the European gas market. This increase was also reflected in the international TTF price index, used to price natural gas in the domestic market as well.
- Faced with the unprecedented increase in energy costs and international energy prices which burdened final consumers, in the last quarter of 2021 DEPA developed a mechanism to absorb part of the price increases in the cost of natural gas through which domestic consumers, directly or indirectly supplied (through third party Suppliers or Providers) received discounts from DEPA. Taking into account the financial sizes of the Company and the level of international prices, application of this mechanism continued in the 1st four months of 2022 as well as in the last quarter of 2022.

- In 2022, DEPA Commercial S.A. granted discounts totaling € 108.69 million mainly to household consumers (as above) and gas vehicle customers.
- In the beginning of May 2022, it was exporting natural gas quantities to the Italian market through the Nea Mesimvria/TAP interconnection point became possible as DEPA had the quantities available through sales on the Italian Energy Exchange (GME) and bilateral transactions, having a share that exceeds 40% of total exports.
- At the end of April 2022, GAZPROM terminated gas deliveries to Bulgaria, thus causing a sharp increase in gas exports from Greece to Bulgaria given that GAZPROM used to cover most of the needs of the Bulgarian gas market. In 2022, total exports almost quadrupled compared to 2021.
- The increase in the price of natural gas, during the summer months (June August 2022) in particular, caused very high electricity prices in the interconnected markets and, subsequently, very high electricity exports, leading, in turn, to the need to increase lignite production by 55%. Thus, production of electricity from lignite has become, by far, more economical than production of electricity from natural gas.
- The above business environment intensified the procedures for obtaining the necessary licenses, necessary for the Company in order to start operations in the markets of Romania, Hungary and Austria. Through these markets, DEPA aims to approach the markets of central and south-eastern Europe.
- The Final Investment Decision (FID) for the construction of the Independent Natural Gas System (INGS) of Alexandroupolis was made on 27.01.2022 by the shareholders of Gastrade SA.
- On February 17, 2022, the Athens Court of Appeal published its decision, vindicating DEPA Commercial in its legal dispute with the Greek Fertilizers and Chemicals S.A. (ELFE), regarding natural gas pricing during the period 2010-2015. The decision of the Athens Court of Appeal, following the joint hearing of the appeals filed by DEPA Commercial and ELFE against the first instance decision of 2019, partially accepts the appeal and the lawsuit of DEPA regarding the debts of the fertilizer industry in Kavala and completely rejects the appeal and the lawsuit of ELFE. ELFE appealed to the Supreme Court against this decision.
- On 07.04.2022 the Board of Directors of DEPA Commercial S.A. decided to acquire 100% of the shares of the company under the title "NEW SPES CONCEPT SA". The Company develops projects for production of electricity from solar energy through photovoltaics (PV) of total capacity 222 MW.
- On 12.08.2022, the Board of Directors of DEPA decided to acquire 100% of the company under the title "NORTH SOLAR 1 S.A.". The Company develops projects for production of electricity from solar energy through photovoltaics (PV). NORTH SOLAR 1 S.A. is developing a project of total capacity 95 MW in Vrysia area of the Farsala municipality of the Larissa Regional Unit.
- On 05.10.2022, the Board of Directors of DEPA Commercial S.A. decided to acquire the remaining 51% of the share capital of the Company "North Solar S.A." and, consequently, DEPA became a sole shareholder of of the company that develops projects for production of electricity from solar energy through photovoltaics (PV) of total capacity 500 MW.
- On 15.11.2022 the Board of Directors of DEPA Commercial S.A. decided to acquire 29% of the share capital of the company "Alexandroupolis Power Plant S.A.". The Company develops projects for production of electricity from natural gas of gross capacity 840 MW.

2. Analytical review per operation – Financial Data.

The analytical data regarding the Company's key operations within the reporting period are as follows:

2.1 Sales of Natural Gas

In 2022, the demand for natural gas in the Greek market amounted to 56.6 TWh, recording a decrease of 19.0% compared to 2021 (70.0 TWh). The use of natural gas in electricity generation amounted to 41.7 TWh compared to 48.0 TWh in 2021, decreased by 13.3%.

Total quantities of natural gas imported into the ESSFA in 2022 amounted to 86.2 TWh (56% pipeline gas and 44% LNG) of which 29.5 TWh were exported to Bulgaria.

In 2022, DEPA's sales decreased compared to 2021 by 7% following the significant drop in the Greek natural gas market, as the increase in international natural gas prices led both to limiting its use in electricity production and its replacement as fuel, mainly in refineries but also in some segments of the industry.

2.2. Natural Gas Supply & Portfolio, Risks & Commercial Transactions Management

Natural Gas Supply

In 2022, DEPA received quantities of natural gas from the supplier companies GAZPROM EXPORT, AGSC, BOTAS and through stock transactions on the Italian Energy Exchange (GME).

Regarding the long-term contract with the supplier company BOTAS (Turkey), the contract terminates on 3/12/2023. In 2022, DEPA received LNG cargoes from SONATRACH's long-term supplier (Algeria) and spot cargoes. In December 2022, new negotiations with SONATRACH were completed aiming to facilitate the annual extension of the contract in 2023.

The main challenge DEPA had to face in 2022, following the Russian invasion in Ukraine, was addressing the risk of gas supply security given the conditions that developed in the International Market.

Thus, in close cooperation with the Greek government, DEPA, signed an agreement with TotalEnergies Gas & Power Limited to secure 13 optional cargoes of liquefied natural gas ("LNG") for April 2022 as well as for the period from November 2022 to March 2023. The right to receive the above cargoes was not exercised, since no supply problem arose in the market.

In 2022, DEPA continued supplying the National Natural Gas System Operator (DESFA) with LNG to balance the ESMFA and with natural gas to hedge the operating gas, through tender procedures.

In 2022, DEPA initiated the registration process for operating on the Hungarian Energy Exchange (CEEGEX - Central Eastern European Gas Exchange Ltd) and on the Austrian Energy Exchange (EEX – European Energy Exchange).

In the first half of 2023, the natural gas supply license was approved in Hungary and the company is now operating on the aforementioned stock exchange.

Use of Infrastructure/Portfolio Management/Secondary Market

In 2022, from March 2022 in particular, when the operation of the Hellenic Energy Exchange for natural gas started, until December 2022, DEPA procured (purchased) and supplied (Sold) quantities of natural gas through the Hellenic Energy Exchange S.A. In 2022, DEPA procured (purchased) and supplied (Sold) quantities of natural gas through the Italian Energy Exchange (Gestore dei Mercati Energetici-GME).

At the same time, within the framework of the Preventive Action Plan, for commercial reasons but mainly based on the domestic security of supply, DEPA proceeded with injection and storage of N.G. in Stogit warehouses in Italy and Chiren in Bulgaria. Moreover, in 2022, DEPA started the necessary studies and actions for its registration as a User in the National Gas Transmission Systems of Serbia, Hungary, Romania and Austria.

In addition, and based on the provisions of the Energy Management Code, in 2022, DEPA carried out other activities related to the secondary market, such as LNG and Storage space transactions with Third-Party Users, allocations of Reception and Delivery capacity, import of LNG cargos with Third Party User of LNG, etc.

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

In addition, according to the provisions of the ESFA Code, in October 2022, Tenders for the use of LNG infrastructure were held in two phases, LNG Time Slots during the 1st Phase of the Tender and Supplementary Capacity during the 2nd Phase of the Tender. DEPA participated in the above Tenders and secured LNG time slots & capacity for the years 2023-2027. Apart from the annual tenders, in the context of supply security in Greece and Europe due to the energy crisis, DEPA proceeded with committing LNG time slots in the spot market.

Furthermore, in 2022, DEPA participated in the MARKET TEST of natural gas transmission system operators.

In 2022, DEPA made use of the Italian Natural Gas System (SNAM S.p.A) and participated in capacity product commitment tenders - through PRISMA platform - both at the Nea Mesimvria and Kipi Interconnection Points as on behalf of Greece and at the Italian Melendugno Interconnection Point. In this context, DEPA made a commitment of Continuous, Correlated and Competitive Capacity products and secured the desired capacities to service its Supply Contracts. Finally, in 2022, DEPA Commercial S.A. supplied customers in Bulgaria, through the Transmission network of the Bulgarian Operator BULGARTRANSGAZ as well as the Operator ICGB EAD.

Procurement – Electricity Sales and participation in Stock Markets

In 2022, DEPA completed its registration in the Register of Participants of the Hellenic Energy Exchange S.A. (HEXE S.A.), in order to start trading electricity quantities for the purposes of electricity supply and trading. At the same time, DEPA's registration with the Joint Allocation Office (JAO) and South East Europe Common Allocation Office (SEECAO) was completed so that it could operate in cross-border electricity trade.

In September, following the conclusion of the first EFET and ISDA contracts for electricity transactions, DEPA started Electricity Trading operations on the Hellenic Energy Exchange and on the electricity interconnections Italy<>Greece, Bulgaria<>Greece and Albania <>Greece. In addition, the registration of DEPA in the European Energy Exchange was launched for conducting energy product derivatives transactions.

With regard to the staff of the competent new Directorate of Supply, Electricity Trading & Stock Markets, special emphasis was placed on training its executives in matters of supply, electricity trading and stock market

transactions, and traders of the European Energy Exchange (EEX) were certified. At the same time, the supply of the necessary Price Forecasting and Data Analysis tools to support the operation of a modern energy products trading unit was completed.

2.3 Monitoring subsidiaries

In 2022, special emphasis was placed on corporate and regulatory issues of the Group's subsidiaries, business decision making as well as acquisition and organization of new subsidiaries. The Company's main priority in matters of monitoring its subsidiaries was to maintain and reinforce procedures facilitating communication, taking into account regulatory restrictions and competition rules as well as the implementation of all the necessary measures to ensure their value and further development, in the context of the difficulties caused by rising gas prices worldwide.

In January 2022, GASTRADE's General Meeting of Shareholders made the Final Investment Decision (FID) for the construction of the Alexandroupolis Floating Storage and Regasification Unit (FSRU). The project is also financed through a project loan from the "National Bank of Greece S.A." ("the Bank") and through equity. In this context, DEPA as well as the other shareholders of GASTRADE guarantee to the Bank their support by signing a special contract ("Sponsors' Support Agreement"), while the same financing has been carried out through a share capital increase and a shareholder loan to GASTRADE.

DEPA's revised strategy foresees its transformation from a natural gas company, mainly operating in the wholesale natural gas market, to a vertically integrated energy company, occupied with a wider range of energy products and services, with a particular focus on the electricity market, in addition to natural gas, especially following the recent developments in the energy market. With this in view, DEPA included in its Business Plan investments aimed at generating a "green" portfolio through its participation in the companies that develop RES projects (PV) as well as electricity production from natural gas.

On 07.04.2022 the Board of Directors of DEPA Commercial S.A. decided to acquire 100% of the shares of the company under the title "NEW SPES CONCEPT SA". The Company develops projects for production of electricity from solar energy through photovoltaics (PV) of total capacity 222 MW, thus marking a new era for DEPA in the segment of Renewable Energy Sources.

On 12.08.2022, the Board of Directors of DEPA decided to acquire 100% of the company under the title "NORTH SOLAR 1 S.A.". The Company develops projects for production of electricity from solar energy through photovoltaics (PV). NORTH SOLAR 1 AE will develop a project of total capacity 95 MW.

On 05.10.2022, the Board of Directors of DEPA Commercial S.A. decided to acquire the remaining 51% of the share capital of the Company "North Solar S.A." and, consequently, DEPA became a sole shareholder of the company that develops projects for production of electricity from solar energy through photovoltaics (PV) of total capacity 500 MW. Consequently, DEPA retains 100% of the Share capital of the Company.

On 15.11.2022 the Board of Directors of DEPA Commercial S.A. decided to acquire 29% of the share capital of the company "Alexandroupolis Power Plant S.A.". The Company develops projects for production of electricity from natural gas of gross capacity 840 MW. The other shareholders of the company are Public Power Corporation S.A. and DAMCO ENERGY S.A. In February 2023 and on the basis of a relevant decision of the Board of Directors of DEPA, the Final Investment Decision (FID) on the Project for the development of a Combined Cycle Unit in the area of Alexandroupolis was made at a General Meeting of Shareholders of Alexandroupolis Power Plant S.A. The Project is to be financed through bank borrowings, shareholder loans and equity/share capital increases.

2.4 Strategic & Corporate Development Strategy – Business Plan

Central axes of the Company's strategy remain as follows: (a) Its transformation from a gas company to an energy company with increased verticality, (b) maintaining its competitiveness in its core business, (c) expanding its operations abroad and (d) being a leader in the adoption of new operations.

DEPA focuses on maximizing its value, through optimizing the performance of its existing activities, as well as developing new / expanding existing activities in the following areas:

- Strengthening its commercial portfolio in natural gas and electricity sectors and the company's foreign commercial operations.
- Supporting retail operations of its subsidiary company "Natural gas Hellenic Energy Company" (EPA Attikis).
- Expanding to electricity production, mainly from RES.
- Participating in infrastructures supporting commercial operations domestically and abroad (FSRU Alexandroupolis).
- Developing new markets using new logistics models (CNG/SSLNG)
- Expanding activity in sustainable development domains, initially through developing the existing participation in the electricity market coupled with pilot projects in production of renewable gas fuels.

These initiatives, most of which are already implemented, are expected to gradually transform DEPA and improve its future profitability, limiting its dependence on situational factors.

CNG Power Vehicles

In the recent years, DEPA has been implementing an ambitious plan to develop a core network of CNG (Compressed Natural Gas) service stations, located in or near major urban centers along the axis that connects the cities of Thessaloniki - Athens, within existing fuels retail stations.

During 2022, twenty five (25) CNG retail stations with the FISIKON brand were in operation inside stations with HELPE group's brand and third parties brands for the CNG supply of commercial and private vehicles, in Attica (Kifissia, New Philadelphia, Koropi, Ag. I. Rentis, Aspropyrgos, Chaidari, Ilioupoli), in Thessaloniki (Pylaia, Nea Magnesia and Stavroupoli), in Larissa, in Volos, in Ioannina, in Kozani, in Veria, in Xanthi, in Komotini, in Lamia, in Chalkida in Evaggelismos SEA (Municipality of Makrychori, Larissa) and Schimatari SEA (New Nat. Road Athens-Lamia) and in Psathopyrgos SEA (New Nat.Road Korinthos -Patra). The total number of CNG stations "FISIKON" including DEPA stations in Anthousa and A. Liosia was 27 at the end of 2022.

Through the network of FISIKON retail stations, annual sales increased by approximately 41% compared to the previous year (2021), exceeding DEPA business plan provisions for this activity.

In 2022, 6 additional stations started operating, 1 remote from the natural gas distribution network (daughter type) in Veria and 5 new stations connected to the natural gas distribution network (mother type) in Xanthi, Komotini, Chalkida, SEA Schimatari and in Haidari, while the operation of the station in Koropi was stopped due to the withdrawal of EKO S.A. from the gas station.

In 2022, the project activities were launched and will continue in the following period in accordance with the development of the service station network. The implementation of the physical object of the EU funding program (TEN program) was completed. It is known that in November 2017 DEPA signed a contract with the E.U.

/ INEA on financing 10 new CNG stations (13 CNG sales points) within or near the major national road axes, which are also part of the trans-European road networks. These stations are subsidized by 50% from the European financial instrument CEF. Given the aid provided by this program, in 2022 the construction of the new stations in Igoumenitsa, Chalkida, Veria, Xanthi, Komotini, SEA Schimatari and Patra was completed. At the same time, the licensing procedure of Palaio Faliro gas stations and the 4th gas station in Thessaloniki, whose construction started in 2022, was completed, while at the same time licensing procedure of another 6 gas stations in total, in Attiki, Thessaloniki and in other areas of the country, started.

The relevant Department of Gas Transportation and Remote CNG & LNG Customers of the Company completed the tender and received seven new CNG trailers to serve the daughter stations.

It also completed the tender and received three new LNG trailers to service the to-be-developed supply network for heavy vehicles with LNG engines. To this end, the company acquired a plot of land in Kalochori, Thessaloniki where, among other things, an LNG, CNG and H2 refueling unit will be installed.

Corporate Development Projects - Inter-Operational Project Office

Regarding the implementation of the corporate development projects, as projected in the Business Plan of DEPA, namely the Projects: (a) Small scale liquefied natural gas (SSLNG), (b) Renewable Energy Sources (RES) (c) Hydrogen and Biomethane (H2BM) (d) Energy Efficiency & Electricity, and the coordinated monitoring of the implementation of these Projects, DEPA has established the Inter-Operational Project Management Office (PMO) as well as the appropriate organizational structure for each Project (Project Team) where executives have joined with high specialization and experience.

(a) Small Scale LNG Project

In the recent years, the Company has systematically invested developing small-scale liquefied natural gas (LNG) applications, focusing on the use of LNG for road and sea transport as well as in order to meet the energy needs of off-grid network. In the previous year, the company's business plan regarding its activity in the development of small-scale LNG infrastructure was updated, while potential strategic partnerships in this domain were explored.

LNG as marine fuel

DEPA is the coordinator of the European POSEIDON MED II and BlueHubs Programs and also participates in the SuperGreen program, thus contributing to the development of an integrated small-scale LNG supply chain in Greece. This chain deals with distribution of LNG to be used in road transport and vessels as marine fuel, as well as LNG supply through virtual off-grid customers.

In this context, DEPA is preparing the construction of a modern LNG transport and supply vessel for maritime use based in Piraeus, which will have the potential to load LNG from vessel to vessel. In addition, the procurement of LNG tankers for refueling small LNG consumption vessels was completed in 2022. This infrastructure will assist DEPA to become the first provider of LNG distribution to vessels in the Eastern Mediterranean.

Co-financing from the EU has been secured for the construction of the LNG supply vessel. (CEF Transport mechanism), through the BlueHubs program, while part of its financing is covered by the contract signed between DEPA and the European Investment Bank (EIB).

The shipyard for the construction of the LNG supply vessel will be selected through an international tender which is ongoing, while the construction contract is expected to be signed in 2023 - construction completion

scheduled for 2025. The vessel will be ready for commercial operation by early 2026 and will be supplied by the vessel loading station in Revythoussa, which is under construction by DESFA.

LNG for off-grid customers and for road transport

LNG, as the cleanest fossil fuel with high energy content, can largely replace 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 all the more natural gas vehicles. To serve the market of heavy natural gas vehicles, the Company has purchased LNG tankers, as well as a plot of land in Kalochori, Thessaloniki, for the installation of the first LNG filling station, while it is also constructing the other similar stations.

LNG for these uses is transported by tankers from the Revythoussa loading station, which has been in operation since the end of 2022.

(b) Renewable Energy Sources Project

The Company develops projects for production of electricity from solar energy through photovoltaics (PV) through its 100% subsidiaries NORTH SOLAR S.A., NORTH SOLAR 1 S.A. and NEW SPES CONCEPT S.A.

Particularly:

NORTH SOLAR: has a portfolio of sixteen (16) projects of total capacity 500 MW, 400 MW projects of which have received a Final Connection Offer and Installation Permits while the remaining are pending.

NORTH SOLAR 1: will develop a project of total capacity 95 MW in the Vrysia area of the Farsala municipality of the Larissa Regional Unit. It has received all the environmental licenses as well as the Final Connection Offer and is in the process of issuing the installation license as well as securing the required land.

NEW SPES CONCEPT: has a portfolio of 14 Photovoltaic Park projects of total capacity 222 MW. The files for granting a Final Connection Offer have been submitted in respect of twelve (12) out of fourteen (14) total projects.

The above investments mark DEPA's entry into RES domain and are part of the continuous strengthening its position in the "green" and alternative energy sources segment, as the Company develops the necessary infrastructure and continues searching further expansion of its "green" portfolio.

(c) Hydrogen and Biomethane Project

Moreover, the Company invests in promising alternative energy sources, such as hydrogen and biomethane. DEPA is a founding member of the European Alliance for Pure Hydrogen, member of the European Hydrogen Association (Hydrogen Europe) and develops independent projects in alternative and cleaner fuels, utilizing its many years of experience in the gas market. These projects will target customers in the segments of road transport, energy production and industry.

To facilitate DEPA to become more familiar with the respective technologies and to have all the necessary data for their evaluation and their expansion on a large scale, respective pilot plans for hydrogen and biomethane are planned and will be implemented.

Regarding the biomethane project, in 2022 DEPA proceeded with the following actions:

- The techno-economic study was completed for selecting and dimensioning the appropriate equipment, recording biogas units and identifying the site suitable for installation and operation of a pilot unit for biogas upgrading to biomethane, its subsequent compression and storage, aiming at further exploiting it as a motor fuel (bio-CNG) through FISIKON stations.
- The company FARMA CHITAS SA located in Filippiada, Preveza prefecture, was selected as the most suitable facility for the operation of the pilot project due to its close location to FISIKON gas stations and its capacity to ensure stable production of the desired quantity and quality of biogas for upgrading it to biomethane. The private agreement with FARMA CHITAS S.A. was signed early in 2023.
- It was decided to hold a tender for "Design, Supply and Installation of a Biogas to Biomethane Upgrading Unit". The technical specifications for the equipment and the selection and grading criteria of the supplier were completed and the tender documentation was prepared. The Tender as well the selected contractor were disclosed in the first half of 2023.
- At the same time, the necessary licensing procedures for the operation of the biogas upgrading unit are in progress.

The completion of the installation and trial operation of the equipment at the FARMA CHITAS SA unit are expected to take place in the third quarter of 2024, when the commercial operation of the biomethane pilot project is estimated to start.

In addition, DEPA is particularly active in the domain of Hydrogen. More specifically:

- The Company plays an active role in the EUROPEAN CLEAN HYDROGEN ALLIANCE, aiming to attract investments in hydrogen technologies and fuel cells by playing a key role in the implementation of the new European industry strategy for investments to increase production and demand.
- DEPA is also a member of the European Hydrogen Association (HYDROGEN EUROPE), participating in all major working groups and closely monitoring developments in the hydrogen sector. The association is based in Brussels and represents more than 200 bodies (industrial companies, research organizations and National Associations) active in the segment of hydrogen and fuel cells.
- Due to DEPA's know-how and long experience in the transportation segment, in 2023 DEPA submitted a proposal for construction of the first hydrogen refueling unit in the region of Western Macedonia.
- DEPA made an active and significant contribution to recently signed JMD on installation of hydrogen filling stations in Greece.
- DEPA is also considering other applications related to hydrogen, such as storage in combination with RES units.

Hydrogen will play a significant role both in the transportation and in energy segment in general. In other European countries, the use of hydrogen in fuel cell vehicles is already entering the market.

(d) Energy Efficiency & Electric Mobility Project

Taking into account the European and, consequently, the National objectives for increasing energy efficiency, reducing pollution and consumption in the coming decades, in order to fulfill the EU's commitment to climate neutrality until 2050 as part of the Europe Green Agreement, DEPA further investigates possible future synergies as well as further expansion of application of energy efficiency systems to larger and energy-intensive consumers. The possibilities and the ways of providing holistic energy solutions are examined, combining the Company's operations with energy services adapted to the respective consumer, utilizing energy consumption data of the facilities.

In 2022, DEPA proceeded with analytical recording the current state of the market in terms of energy efficiency in accordance with the current legislative framework, the National and European Goals as well as the analysis of the competition in the Greek market in terms of the services offered by the energy providers.

In addition, energy efficiency systems for household consumers, as well as the segment of electric mobility, are being developed by the subsidiary of DEPA, NATURAL GAS ATTIKIS SA (d.t. "NATURAL GAS -GREEK ENERGY COMPANY"). The commercial operation of these new services took place within the year 2022.

2.5 Financials

DEPA S.A. Financial Data

The Company has been audited for tax purposes until the fiscal year 2021 by the Statutory Auditors in accordance with the provisions of article 65A, par. 1, Law 4174/2013. The tax audit by the Statutory Auditors for 2022 is in progress in accordance with article 65A, par. 1, Law 4174/2013.

It is proposed to distribute a dividend of € 27.57 per share (amounting to € 5,485,878.60) to the Shareholders.

DEPA COMMERCIAL S.A. Financial Data (€)

	THE COMPANY		
1. STATEMENT OF COMPREHENSIVE INCOME	31/12/2022	31/12/2021	
- Turnover (sales)	4.252.313.408	1.417.142.117	
- Gross profit	102.568.714	252.336.264	
- Operating Profit	28.469.669	316.709.859	
- Profit before tax	36.929.649	334.956.190	
- Profit after tax from continuing operations	21.047.089	260.267.265	
- Profit after tax from continuing and discontinued operations	21.047.089	260.267.265	
- Total comprehensive income after tax	32.118.520	249.167.040	
	THE COMPANY		
2. STATEMENT OF FINANCIAL POSITION	31/12/2022	31/12/2021	
- Total fixed assets	181.832.443	124.148.454	
- Inventories	173.599.335	98.709.042	
- Trade and other receivables	613.854.077	466.064.623	
- Cash and cash equivalent	178.848.526	249.224.389	
TOTAL ASSETS	1.148.134.381	938.146.508	
- Total Equity	551.468.116	609.963.098	

- Total long-term liabilities	3.732.485	4.088.209
- Total short-term liabilities	592.933.780	324.095.201
- TOTAL EQUITY AND LIABILITIES	1.148.134.381	938.146.508

Insurance Programs

Insurance Contracts of DEPA for the reporting period relate to those in respect of Fixed Assets to cover all risks, Mechanical Damage, Business Interruption, Legal Liability, Antiterrorist Actions, Directors and officers liability ("D&O"), Fire and Other Damage to Property, Rented Building, Gas Stations, Vehicles and Other Insurance including insurance contracts related to: Theft or Burglary, Money Transfer, Employee Confidence, Electronic Equipment, Employees and BoD Members Personal Accidents.

Lines of Credit

The Company maintains credit lines in order to meet its needs for working capital purposes amounting to €335.000.000,00.

2.6 Human Resources

In 2022, DEPA continued to apply the additional procedures of the Labor Inspection, which were provided for in the labor legislation due to the prevention measures of the Covid-19 pandemic. Until March 2022, the company maintained its extraordinary operating measures under teleworking mode.

Personnel – Labor Relations

As at 31.12.2022, DEPA's headcount stood at 26 persons employed under permanent contracts (after the departure of 4 employees in implementation of an early voluntary retirement program), while 5 lawyers served in the Company under a salaried mandate contract.

In 2022, DEPA continued its cooperation with the companies rendering administrative, financial, operational support services as well as administrative and operation & maintenance services of SALFAs. In addition, to support the needs of the Company's new development projects, the Board of Directors approved a procurement tender to sign a new agreement on rendering support services related to projects development.

Employees remuneration

In 2022, remuneration of DEPA's staff was determined in compliance with the provisions of a two year Business Collective Agreement (BCA), as agreed upon and signed at the beginning of 2022. The BCA terms of 2009, which were still effective under BCA of 2022, were adjusted in order to comply with the provisions of Laws 3833/2010, 3845/2010 and Laws 4354/2015, which govern the operations of the public sector companies under Chapter B of Law 3429/2005. In the context of limiting its operating expenses and in 2022 the Company continued taking actions to reduce the cost of overtime, setting limits per organizational unit, which were achieved.

Employees Insurance Plan / Retirement plan

In 2022, two collective insurance contracts for the employees were still effective. The first contract covers Life Insurance, Permanent Total and Partial Disability Insurance, from illness or accident, Extensive Medical Coverage and Loss of Income from Illness or Accident.

The second contract is a retirement plan through an insurance company, operating since 1996, based on contribution rates, in which both the Company and its employees participate. In the framework of this plan, there is an Additional Act concerning provision for the payment of a one-time Severity Allowance.

Human Resources Development

In 2022, a total of 72 training programs were implemented, 18 of which - intra-company, 14 inter-company and 40 conferences. Approximately 58% of DEPA employees participated in the programs.

The inter-company training programs concerned the developments of the LNG market, the energy exchange, occupational health & safety issues, labor changes, accounting (myData), ISO standards, business administration, management, as well as internal control. In particular, to support the commercial activity, in 2022, training seminars were organized aimed at Energy Trader certification exams, as well as the seminars necessary for the Company's operation on the Greek and international Energy Exchanges.

Human Resources Organization & Procedures

In the context of the project for recording and reviewing DEPA's procedures, undertaken in collaboration with a consulting company, in the previous year 12 main procedures were submitted for approval, following the "Aris" modeling system, contributing to the recording and optimization of the procedures related to its main operations.

In July 2022, DEPA approved the Policy for preventing and combating violence and harassment at work.

Student Internship Program

In 2022, DEPA offered five students the opportunity to carry out their internship in its offices, in order to get acquainted with the real environment of an organized business and to apply in practice the knowledge they acquire during their studies in educational institutions.

This internship was carried out under the supervision of competent executives of the company, in subjects related to the studies and the interests of the students and in the context of special written contracts conducted between the Company, the students and the educational institutions.

2.7 Occupational Health and Safety Issues

Occupational Health and Safety are top priority issues for DEPA and, therefore, for one more year, the Company continued implementing prevention and safety actions against Covid-19, aimed at protecting its employees and citizens. DEPA implemented the policy for addressing confirmed and suspected Covid-19 cases applying teleworking, conducting regular Covid-19 diagnostic checks on employees and visitors before they enter DEPA as well as providing high protection masks to all the employees.

In 2022, employees were trained in fire protection and building evacuation issues during scheduled exercise.

DEPA procured an automatic external defibrillator (AED) and the volunteer Emergency Team was trained in immediate First Aid, CPR using AED and received a European First Aid Diploma from the Hellenic Red Cross.

In its desire to prioritize improving the mental health and quality of life of its employees, in 2022, DEPA included in its training program the seminars on mental resilience and work stress management. Moreover, in the beginning of 2023, a study and analysis of the workplace, health and physical condition of every employee will be completed.

2.8 Quality Systems

Quality Systems

Regarding the Energy Management System (EMS) of the company according to ISO 50001: 2018, the inspection of the system for the significant energy consumption of the reporting year 2021 was performed in April 2022. Also, as DEPA has the obligation to perform regular energy audits every 4 years according to law 4342/2015, the 2nd consecutive energy evaluation was completed in collaboration with an independent energy auditor and was submitted to the Ministry of Environment and Energy.

The Supervision Inspection of SALFA facilities in matters of Health & Safety at Work and Environment according to the standards ISO 14001 and ISO 45001 was successfully completed in May 2022. The system was evaluated and its successful implementation was confirmed as well as the continuous effort to consolidate the Health and Safety culture in work and Environmental protection.

In 2022, the development of a Quality System according to ISO 9001: 2015 for the commercial activities of DEPA continued, while the certification of the system is expected to be completed within 2023.

Environment

The Company complied with the obligation to submit a greenhouse gas emission intensity report in compliance with the provisions of of Law 4062/2012.

Regarding the Enforcing Energy Performance Obligation Regime under Law 4342/2015, following the incorporation of Directive 2018/2002/EU as well as the issuance of the new Operating Regulations for the period 2021-2030, DEPA submitted an Annual Plan for the Implementation of Energy Savings Actions achieving the annual target set for 2022.

Business Procedures

In 2022, the Design and Redesign of sixty (60) existing procedures of DEPA was completed according to the international standard BPMN 2.0 (Business Process Model and Notation) and the use of the information system "Aris Connect" which DEPA procured for further development, review and update of all its procedures. ARIS Connect software can contribute to facilitating stable and sustainable growth and better collaboration throughout the organization.

2.9 Administrative and IT Services

In 2022, Administrative Services and Information Technology Services provided support and assurance services for the proper administration of the Company and the companies arising following the Group transformation under Law 4643/2019, as well as DEPA information systems development services in order to maintain and

improve corporate operations at a high level and to meet new needs.

During the first half of 2022, the electronic Management & Certification of Contracts of the various Directorates of the Company was fully operational, using the data already registered in the platform of the integrated system for monitoring purchase requests & contract management.

At the end of the first half of 2023, the evaluation procedure of existing suppliers using performance criteria will be put into full operation on the platform of the integrated system for monitoring purchase requests & contract management.

2.10 Business Organization

During the reporting year, the procurement, configuration and installation of customer relationship management software was completed, which will be used to better manage the Company's clientele and in particular – in the first phase – the procedure of attracting new customers. The project entered into operation in the 1st quarter of 2023.

Additionally, following the project of procurement, configuration and installation of procurement procedure management software, contract execution monitoring was put into operation, significantly speeding up the specific operation.

Moreover, a project was initiated aimed at transfer and integration (migration) of all the existing documents of the "DIAS" protocol system used by DEPA to date into new, specialized software. The new software will offer increased possibilities for automating the documents management, improving their recovery time, as well as the interconnection with the other Company's systems.

2.11 Monitoring implementation of Regulatory Provisions

DEPA operates in full compliance with the provisions of the current legal and regulatory framework, regarding the supply and distribution of natural gas as well as its participation in the internal market of natural gas of the EU, under the supervision of the Regulatory Authority of Energy (RAE), now Waste, Energy and Water Regulatory Authority (PAAEY). The key objective is the planning, coordination and implementation of the Company's compliance strategy in the constantly changing regulatory framework. At the same time, DEPA, with its activities, mainly in natural gas, supports the country's commitments to adopt measures to achieve the goals of addressing climate change, adjusting accordingly its strategy to maintain its sustainable course.

In this context in 2022, the following issues continued, in particular:

- monitoring the regulatory developments at European and national level, in the energy sector in general (electricity, RES, CO2 rights, coke) and natural gas, including renewable and low/zero carbon gases (biomethane, hydrogen, etc.), to ensure timely informing the company and facilitating its effective response to the currently effective regulatory requirements,
- coordinating actions for active involvement of the company in the consultations (of European and national interest) as well as elaborating other market positions for a comprehensive knowledge of its issues and developing strategic alliances to achieve a sound, regulatory environment
- monitoring the European and global energy market in relation to planning the new climate actions and implementing activities that contribute to achieving climate neutrality by 2050, through the package of

measures "FIT for 55", as well as the REPowerEU plan, defining a list of additional short-term measures to combat high energy prices and address potential supply chain disruptions from Russia.

- documentation to RAE and Hellenic Statistical Authority of the data required to comply with the Company's
 obligations arising from regulatory regulations
- participation in groups of international energy bodies, such as EFET (Gas Committee, Task Force Central South-Eastern Europe and Renewable Gas Working Group) and Eurogas (Steering Committee, Wholesale Market Committee, Gas Advocay Group, Renewable & Decarbonized Gases Working Group, Transparency Market Integrity Working Group, Transport Working Group etc.) 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 Company's strategic interests.

2.12 Legal Matters

In 2022, the Company's Legal Services completed a complex project of addressing pending litigations and extrajudicial litigations and covering the Company's day-to-day regular and extraordinary legal issues that took place in full spectrum of its business activities, including issues related to the operating of the liberalized energy market, regulatory issues, gas supply, company law issues, DEPA customer overdue receivables management, and any other issues of legal nature that have arisen (administrative law, appeals, civil and criminal matters, etc.).

In this context, there was a decisive and successful contribution of the Legal Services in the acquisition of shares in the share capital of new companies, in the legal issues concerning the monitoring of the Group's subsidiaries, in the Final Investment Decision for the FSRU project of Alexandroupolis, as well as in a series of cases before Courts and Independent Authorities, before Arbitration Courts, as well as in issues related to the out-of-court settlement or settlement of disputes with clients.

- On February 17, 2022, the Athens Court of Appeal published its decision, vindicating DEPA Commercial in its legal dispute with the Greek Fertilizers and Chemicals S.A. (ELFE), regarding natural gas pricing during the period 2010-2015. The decision of the Athens Court of Appeal, following the joint hearing of the appeals filed by DEPA Commercial and ELFE against the first instance decision of 2019, partially accepts the appeal and the lawsuit of DEPA regarding ELFE debts and completely rejects the appeal and the lawsuit of ELFE.
- The outcome of the second International Arbitration with BOTAS for the 2nd and 3rd revision request of the contractual gas supply price was extremely positive for DEPA and its customers. In particular, on 10.01.2020, the International Court of Arbitration vindicated DEPA to a very large extent, imposed the retroactive reduction of the contractual price from 15.06.2011, and awarded in favor of DEPA the difference arising from the application of the new price to all the invoices from 15.06.2011 onwards. BOTAS paid the amount of the above dispute, but filed a lawsuit to the Jurisdiction of Sweden, claiming the annulment of the arbitral decision. On February 24, 2022, the competent Stockholm Court of Appeal published its decision, which definitively and irrevocably rejected BOTAS lawsuit.

Finally, the involvement of the Legal Services in public consultations on the change of secondary gas legislation, public procurement and, by all means, the transformation of the gas market issues was significant.

2.13 Matters of Compliance under the rules of free competition law

In 2022, the effort to support and develop DEPA's commercial operations in compliance with the rules of free competition law continued. In particular, in the context of shaping DEPA's commercial initiatives, the Company Services that requested relevant guidance were given legal clarifications and answers from the point of view of

the Company's compliance with the rules of free competition law.

At the same time, a request was submitted by DEPA to the European Commission for the provision of an exception to the Company in terms of its obligation to carry out specific tenders in the context of its various activities and, in the context of examination of the request, the relevant communication with the European Commission is in progress.

DEPA was in communication with the executives of the Competition Commission and the General Directorate of Competition on matters concerning it.

2.14 Corporate Social Responsibility

In 2022, the Actions of Corporate Social Responsibility were continued, applying practices aimed at:

- taking care of the health and safety of employees and associates,
- promoting Sustainable Development and shaping a culture around clean energy,
- supporting the society and the local community,
- developing and implementing programs and actions that contribute to achieving social prosperity and social cohesion.
- sports and culture
- encouraging the younger generation,
- strengthening health system
- maintaining effective communication with all the stakeholders

In the first half of the year, DEPA needs were determined by the course of Covid-19 pandemic and the annual planning was adjusted accordingly, covering the arising additional needs.

The corporate responsibility plan for the previous year focused on the employee and the society.

DEPA has successfully met its objective and has become an energy Group that invests and in Sustainable Development and respects the environment, ensuring that society's needs are met.

2.15 Membership in Professional Associations

DEPA is a member of International and Hellenic Corporate Associations and Chambers among them in EUROGAS, EUROPEAN FEDERATION OF ENERGY TRADERS (EFET), INTERNATIONAL GAS UNION (IGU), HYDROGEN EUROPE, NGVA Europe, Eastern Mediterranean Gas Forum-Gas industry Advisory Committee as well as in SEV, IENE and EVEA.

2.16 Internal Audit

In order to ensure the independence and full transparency of the Internal Audit Service, its operation is supervised by an Audit Committee which has been approved by the Board of Directors of DEPA and is composed of non-executive members of the Board of Directors.

The audit procedures were completed in accordance with the approved Audit Plan without any differentiation.

At the same time, the Internal Audit Department took the necessary steps in order to recognize the status of the course of corrective actions related to the audits findings.

2.17 Corporate Governance

DEPA pays particular attention to Corporate Governance issues and, while not legally required, seeks to implement the best practices arising from the effective legislation and the Greek Code of Corporate Governance applicable to Listed Companies.

In this context, in recent years, the Management established a position of Corporate Secretary, whose responsibilities include, inter alia, facilitating regular flow of information between the Board of Directors and its committees, as well as between the Board of Directors and organizational and administrative structures of the Company and effective organization of the General Meetings and sound communication of the Company's shareholders with the Board of Directors.

Moreover, as aforementioned, the BoD by its decision has established an Audit Committee, in which nonexecutive members of the BoD participate.

3. Projected course and the Group's development

The year 2022 had to address major disruptions in the global gas market since delivery of Russian natural gas via pipelines to Europe substantially decreased, applying unprecedented pressure on natural gas supply, which, in turn, triggered a global energy crisis leading to historically high gas and electricity prices mainly in Europe.

European countries responded through a combination of targeted policy measures, LNG imports reaching historically high levels, significant reductions in consumption particularly in energy-intensive industries, and an unexpected ally of unusually good weather dominating in the northern hemisphere. As a result, prices gradually deescalated, starting at the end of 2022, but remained relatively high compared to the pre-crisis years.

However, the global natural gas balance is fragile and still dominated by uncertainties in 2023, such as gas supply in Europe, LNG demand in the international market as well as weather conditions especially in winter. Since the beginning of the crisis, European governments and energy-dependent countries have implemented measures in order to increase their energy security and reduce dependence on natural gas.

Given such conditions, in 2023 the demand for natural gas in our country is expected to further present a decline compared to high levels of both 2021 and 2022.

At medium to long term, although there is considerable uncertainty, it is estimated that gas will play a significant role in the energy transition, with increasing demand compared to the low levels expected in the short term.

Therefore, DEPA is called upon to operate in an environment of high uncertainty and liquidity, where provisions and estimates are difficult to formulate. The energy crisis and strong inflationary pressures are estimated to continue at least for 2023.

DEPA has created a balanced and flexible portfolio of supply contracts, which includes long-term contracts related to both oil and European gas hubs (TTF, PSV) while also operating in the spot market. In this context, DEPA is estimated to remain competitive in the Greek market, while at the same time it will be possible to expand its operations in neighboring markets.

In any case, DEPA's main strategic goal remains its gradual development from a gas company operating mainly in the domestic market, to a vertical energy company with diversified activities in a wide range of energy sector at regional level.

In this context, DEPA main priority is the implementation of the objectives and business initiatives of its Business

Plan, so that DEPA both maintains its competitiveness in the natural gas market and expanding into new sustainable development activities, while strengthening its medium long-term prospects.

DEPA's business objectives include the following:

- Addressing the effects of the energy crisis, inflation and geopolitical developments
- Emphasis on the international orientation of the Company, with active participation in the markets and Energy Exchanges of Greece and the wider region (Italy, Balkans and Central Europe).
- Utilization of the upgraded role of LNG
- Strengthening its position in the electricity market
- Optimizing the management of the gas and electricity portfolio,
- Utilizing risk management methods.
- Participating in projects that promote the green transition
- Investments in infrastructure that enhance the energy security of the South East. Europe

DEPA's priority still lies with implementing the projected investments, keeping on-going contact with its suppliers in order to effectively meet the customers' needs and remaining committed to its main objective, i.e. ensuring the role model that DEPA plays in Greece.

4. Post Statement of Financial Position Significant Events

There were no events subsequent to the financial statements as of 31 December 2022 that would have a significant impact on the understanding of these Financial Statements and should either have been disclosed or affect the amounts in the published financial statements.

The key companies that constituted DEPA Group during the reporting period are summarized below as follows.

III. SUMMARY PRESENTATION OF THE GROUP COMPANIES

1. NATURAL GAS COMPANY – HELLENIC ENERGY COMPANY S.A.

ATTIKI GAS SUPPLY COMPANY S.A. under the distinctive title "Natural Gas Company - Hellenic Energy Company SA " operates as a supplier of gas and electricity under the provisions of Law 4001/2011, as currently effective. DEPA COMMERCIAL S.A. is the sole Shareholder of NATURAL GAS - HELLENIC ENERGY COMPANY.

On December 31, 2022, NG-HEC completed its 6th corporate year. The year 2022 witnessed significant challenges mainly due to the special conditions formed in the energy market following the continuous increases in natural gas and electricity products supply prices in line with the intense competition among alternative energy providers. In 2022, new retail gas customer contracts remained high and amounted to 17,612 (2021: 20,523). Considering the significant share NG-HEC already held at the end of 2021, in 2022, it managed to maintain its position and increased its customer base in certain geographical areas - both in the category of residential customers and Industrial and Large Professionals.

At the end of its 5th year of operations in the electricity market, new retail customers bilateral contracts with NG-HEC increased significantly, compared to the previous year, reaching 51,520 (against 61,592 in 2021). The Hellenic Energy Exchange report for December 2022 states that the market share of NG-HEC in Greece as at 31.12.2022 stood at 2.50% (2021: 2.11%). The past year was also characterized by the special market conditions introduced by Law 4951/2022, as the Adjustment Clause in Electricity supply tariffs was abolished on August 1, 2022. Instead, suppliers in the case of floating tariffs announce in advance the prices that will apply for every subsequent month. Following the application of the aforementioned Law, NG-HEC announces the commission

charges on a monthly basis in accordance with the legal provisions.

In 2022, NG-HEC continued implementing its investment plan mainly in infrastructures related to provision of digital services to consumers, procedures automation, provision of new innovative self-service services to its consumers as well as the projects aimed at optimizing the company's performance during teleworking regime. The implementations carried out during the year concerned meeting the regulatory requirements for consumers, improving the consumer experience, increasing the efficiency of the organization through automation of corporate procedures, and finally the possibility of increasing NG-HEC sales.

The financial results in 2022, in relation to the corresponding ones in 2021, are as follows:

- Revenues from sales amount to € 883,192 million compared to € 406,160 million in 2021
- Earnings before interest, taxes, depreciation and amortization (EBITDA) amount to € 45,601 million compared to € 19,865 million in 2021
- Profits before tax amount to € 43,895 million compared to € 18,471 million in 2021
- Net profit after tax amount to € 32,853 million compared to € 14,184 million in 2021

Liquidity risk management includes maintaining adequate cash and cash equivalents and ensuring the availability of financing from a sufficient amount of credit lines. NG-HEC, in order to face any liquidity risk that may arise due to the existing energy crisis, proceeded with increasing its approved credit lines. As of December 31, 2022, its operating liabilities are covered by the use of short-term credit lines.

NG-HEC's priority was managing the great challenges existed in 2022, while achieving financial and commercial goals. On the one hand, it was the sixth year of operation in the free gas market and a year of intense competition in the electricity market, while on the other hand, there was a significant increase in commodity prices resulting in squeezing margins and liquidity that characterized the financial year 2022.

The main sizes of the energy market were the intense competition in the field of offered prices and the actions to increase the customer base at all costs, as well as the uncertainty arisen in the market due to the Russian invasion in Ukraine.

As a result, uncertainty is created regarding the course of the companies in the sector due to the financial pressures imposed. The Greek Government has taken adequate timely measures, offering subsidies for energy bills in order to mitigate the potential impact on consumers and particular legislation has been introduced to facilitate provision of financial support to enterprises.

NG-HEC's main objective for the next period is to continue its growth course in both the Natural Gas and Electricity markets, manage cash liquidity and maintain cost control. The main axes for achieving the goal is maintenance of its strong share in the Natural Gas market in Attica and the investment in the market of Northern and Central Greece as well as greater penetration in the electricity market nationwide.

In order to achieve the above, it mainly focuses on enhancing quality and consistency of customer service, innovative e-services, value-added services and partnerships, provision of mechanisms for recognizing consumer loyalty and trust and development of a service ecosystem in general, which will create the necessary environment of trust. At the same time, it remains committed to maintaining control over its costs and improving debt collection through implementation of a consistent credit policy.

2. GASTRADE S.A.

GASTRADE SA was established in 2010 and operates under Law 4001/2011.

Apart from DEPA COMMERCIAL that holds 20% of the shares of Gastrade, the other Shareholders of the company are Mrs. Asimina Kopelouzou (20%), the company Gaslog Cyprus Investments LTD(20%), the company Bulgartrans gaz EAD (20%) and DESFA SA (20%).

Its main objective includes development, operation, exploitation and management of gas systems in a safe, adequate, reliable and cost-effective way. In this context, GASTRADE SA is the first company in Greece to be granted an Independent Natural Gas System the project of the Alexandroupolis LNG Terminal by the Ministry of Environment, Energy and Climate Change on 19-8-2011 (APA: 4AMF0-2SP) with the approval of RAE (decision 29/2011 as of 25-7-2011).

The project of the Independent Natural Gas System(INGS) of Alexandroupolis is a modern, innovative and hightech project that includes an offshore floating unit for the receipt, storage and gasification of Liquefied Natural Gas (FSRU), which will be anchored in the sea area of 10 km far from the Alexandroupolis shore and a system of pipelines with a total length of 28 km (submarine pipeline 24 km and land 4 km) through which natural gas is forwarded to the National Gas Transmission System (NNGS) and from there to final consumers. Alexandroupolis INGS also has the ability to connect and supply natural gas and other upstream and downstream natural gas transmission systems (IGB, TAP).

FSRU will have a liquefied natural gas (LNG) storage capacity of 153,500 cubic meters, a nominal gasification capacity of 5.5 billion cubic meters. per year and maximum technical gasification capacity 22.7 million c.m. per day equivalent to 8.3 billion c.m. annually. The unit will be equipped with 3 LNG gasifiers, which will operate with a hybrid system (open and closed cycle).

Under no. 4968 / 22.9.21 Decision of the Ministry of Development and Investment, the project was included in the Operational Program of the NSRF "Competitiveness, Entrepreneurship and Innovation 2014-2020" (EPANEK) with the public expenditure standing at Euro 166.7 million according to the relevant decision approving the European Commission aid on 17 June 2021.

Whilst all the aforementioned criteria were met, in January 2022, the Company's Shareholders received the Final Investment Decision (FID) for the construction of Alexandroupolis Floating Storage and Regasification Unit (FSRU). The construction component of the project started immediately once the FID was issued and the Unit is expected to become operational in the beginning of January 2024.

The financial data of the year 2022 in relation to the corresponding data of the year 2021 are as follows:

• In the closing year, GASTRADE's profit before tax stood at €18,695,491 compared to loss of €1,777,443 in the previous year 01.01.2021 - 31.12.2021. It is to be noted that 80% of the year's profits arise from valuation gains on financial interest rate swap contracts and forward exchange transactions.

The operating expenses for the closing year amounted to €1,588,126 compared to €1,768,546 in the previous year. During the fiscal year - based on the progress of the project - a total amount of €90,936,938 was disbursed by the Operational Programme Competitiveness, Entrepreneurship & Innovation (EPAnEK).

Alexandroupolis INGS will secure new quantities of natural gas for the supply of the Greek and regional market of SE Europe, while contributing to the expansion of sources and routes of gas supply, to the promotion of

competition for the benefit of the final consumer, to the security of Greece and the Balkan countries, in improving the reliability and flexibility of the National Natural Gas System as well as the Regional and Trans-European Systems but also in strengthening the country's environmental objectives.

3. NORTH SOLAR S.A.

In January 2021 the BoD of DEPA decision no. 1405 / 29.01.21 approved the acquisition of 49% of the share capital of the company NORTH SOLAR S.A., which develops photovoltaic projects in Western Macedonia with a capacity of 500MW.

On 05.10.2022, the Board of Directors of DEPA Commercial S.A. approved DEPA's option to acquire the remaining 51% of the share capital of the Company "North Solar S.A." and, consequently, and consequently DEPA acquired 100% ownership of North Solar.

Regarding the project, in February 2021, the necessary applications for the issuance of Decisions Approving Environmental Conditions (AEPO) were submitted. In December 2021, the environmental licensing procedure for all the projects of NORTH SOLAR S.A. was completed and in August 2021, the procedure of submitting an application to finalize network connection conditions to ADMIE, for all the projects, was completed. On 13.12.2022 the ADMIE's decision was issued for the Final Connection Offer for three (3) Photovoltaic Plants (PVS), of total final installed and maximum production capacity 349.69100 MW and on 12.16.2022 the ADMIE's decision was issued on the Final Connection Offer for two (2) Photovoltaic Plants, of total final installed and maximum production capacity 309.61MW, which received the respective Installation Licenses issued in 2023. The issue of the Final Connection Offer for the projects of priority group A3 of total capacity 399.61MW, which received the respective Installation Licenses issued in 2023. The issue of the Final Connection Offer for the projects included in priority group B of total capacity 99,396MW is pending, in accordance with YA YPEN/GDE/84014/7123 (Government Gazette 4333/B'/12.08.2022).

4. NEW SPES CONCEPT S.A.

DEPA Board of Directors decision No. 1444/1/07.04.2022 approved the acquisition of 100% of the societe anonyme under the title "NEW SPES CONCEPT SA", whose objective is development of projects for the production of electricity from solar energy through photovoltaics of capacity 222 mw and currently develops 14 photovoltaic projects and is in possession of 14 Electricity Producer Certificates. Following the above decision, on April 11, 2022, the transaction was completed and the share purchase agreement (SPA) between DEPA and the Sellers mentioned was signed and the Sellers transferred all the shares of NEW SPES CONCEPT SA to DEPA.

Regarding the licensing development of the company's portfolio, requests have been submitted for granting a Final Connection Offer for twelve (12) Photovoltaic Stations out of fourteen (14) projects and their issuance is expected.

Moreover, in compliance with YA YPEN/GDE/84014/7123 (Government Gazette 4333/B'/12.08.2022), five (5) projects of total capacity 75.61606MW have been included in priority group B.

5. NORTH SOLAR 1 S.A.

On 12.08.2022, the Board of Directors of DEPA decided to acquire 100% of the company under the title "NORTH SOLAR 1 S.A.".

The company NORTH SOLAR 1 was established in July 2022, is domiciled in Grevena and operates in Greece, developing projects for production of electricity.

NORTH SOLAR 1 develops a Project of total capacity 95 MW in Farsala area of the Larissa Regional Unit, which holds Connection Conditions.

6. ALEXANDROUPOLIS POWER PLANT S.A.

On 15.11.2022 the Board of Directors of DEPA Commercial S.A. decided to acquire 29% of the share capital of the company "ALEXANDROUPOLIS POWER PLANT S.A.". The Company develops a project for production of electricity from natural gas of gross capacity 840 MW in Alexandroupolis.

On 02.02.2023 and on the basis of a relevant decision of the Board of Directors of DEPA, the Final Investment Decision (FID) on the Project for the development of a Combined Cycle Unit in the area of Alexandroupolis was made at a General Meeting of Shareholders of Alexandroupolis Power Plant S.A. The Project is to be financed through bank borrowings, shareholder loans and equity/share capital increases.

On 02.02.2023, the General Meeting of Shareholders of "ALEXANDROUPOLIS POWER PLANT S.A.". made the Final Investment Decision (FID) on the Project for the development of a Combined Cycle Unit in the area of Alexandroupolis. The Project will be financed through a bank loan (bond loan issued by "ALEXANDROUPOLIS POWER PLANT S.A." and coverage of the "National Bank of Greece S.A." as well as the relevant financial and collateral agreements and documents completed on 03.07.2023), shareholder loans and equity/share capital increases.

DEPA COMMERCIAL GROUP S.A.						
Y 2022						
INANCIAL RATIOS (AMOUNTS IN THOUSAND EURO)						
. FINANCIAL STRUCTURE RATIOS						_
	FY 2022	FY 2022		FY 2021		
1 CURRENT ASSETS TOTAL ASSETS	.= <u>1.142.162</u> .=	85,75%	,=	942.784 .=	88,15%	
2 EQUITY TOTAL LIABILITIES	.=	82,85%	.=	<u>639.511</u> .=	148,73%]
3 EQUITY FIXED ASSETS	.===	318,04%	.=	639.511 .=	504,74%]
4 CURRENT ASSETS CURRENT LIABILITIES	.==	164,96%		942.784 394.838 .=	238,78%	
5 WORKING CAPITAL CURRENT ASSETS	.==	39,38%		<u>547.947</u> 942.784 -	58,12%	
PERFORMANCE RATIOS 6 NET OPERATING RESULTS 5 SALE OF INVENTORY AND SERVICES	.=	1,03%	.=	<u>262.762</u> .=	15,48%]
7 NET EARNINGS BEFORE TAX EQUITY	.=	12,59%	.=	<u>340.353</u> .=	53,22%]
GROSS RESULTS SALE OF INVENTORY AND SERVICES	.=	3,65%	.=	282.726	16,66%]
9 GROSS RESULTS COST OF SALES OF INVENTORY AND SERVICES	.=	3,79%		282.726	19,99%]
10 SALE OF INVENTORY AND SERVICES EQUITY	.==	799,79%	.=	<u>1.696.904</u> 639.511 .=	265,34%]
MANAGEMENT RATIOS						
11 NEW INVESTMENTS SELF FINANCING MARGIN	.=	134,01%	.=	<u>4.596</u> .=	83,13%]
	.= <u>617.375</u> × 360	46,05		416.590 1.696.904 × 360	88,38	

(6) In the numerator, the working capital arises from the current assets less the current liabilities
 (11) In the numerator, new investments arise from the additions of tangible and intragible assets, while in the denominator, the self-financing margin includes total depreciation for the year less depreciation of freed assets grants
 (12) In the numerator the receivables from customers include trade receivables plus revenue receivables less the provisions

COMMERCIAL S.A. 22						
22						
ICIAL RATIOS (AMOUNTS IN THOUSAND EURO)						
NANCIAL STRUCTURE RATIOS	FY 2022		FY 2021			
	-					
CURRENT ASSETS TOTAL ASSETS	.=	84,16%	.=	<u>813.998</u> 938.147 .=	86,77%	
εουπγ	551.468		1	609.963		
TOTAL LIABILITIES	.=	92,42%	.=	328.183	185,86%	
EOUITY FIXED ASSETS	.=	303,28%	.=	609.963	491,32%	
]			
CURRENT ASSETS CURRENT LIABILITIES	.=	162,97%	.=	813.998 324.095 .=	251,16%	
WORKING CAPITAL	373.368	00.040	1	489.903		
CURRENT ASSETS	966.302	38,64%	.=	813.998	60,18%	
RFORMANCE RATIOS						
NET OPERATING RESULTS SALE OF INVENTORY AND SERVICES		0,49%	.=	260.267	18,37%	
NET EARNINGS BEFORE TAX	·		1			
EQUITY	.=	6,70%		334.956 .=	54,91%	
GROSS RESULTS	.=	2,41%	1	252.336	17,81%	
SALE OF INVENTORY AND SERVICES	4.252.313	2,41%	.=	1.417.142	17,01%	
GROSS RESULTS COST OF SALES OF INVENTORY AND SERVICES	102.569	2,47%		252.336	21,66%	
-	•]			
SALE OF INVENTORY AND SERVICES EQUITY	.=	771,09%	.=	1.417.142 609.963	232,33%	
AGEMENT RATIOS						
	.=	305,38%		3.406	183,71%	
SELF FINANCING MARGIN	•		1			
TRADE RECEIVABLES SALE OF INVENTORY AND SERVICES ON CREDIT		40.63	DAYS .=	312.708 1.417.142 × 360	79,44	DA
					·	

(5) In the numerator, the working capital arises from the current assets less the current liabilities
 (11). In the numerator, new investments arise from the additions of tongible and intragible assets, while in the denominator, the self-financing margin includees total depreciation for the year less depreciation of fixed assets grants
 (12) In the numerator the receivables from customers include trade receivables plus revenue receivables less the provisions

III.INDEPENDENT AUDITOR'S REPORT

To the Shareholders of the Company DEPA COMMERCIAL S.A.

Report on Separate and Consolidated Financial Statements

Opinion

We have audited the accompanying separate and consolidated financial statements of DEPA COMMERCIAL S.A. (the Company), which comprise the separate and consolidated statement of financial position as at December 31st, 2022, separate and consolidated statements of comprehensive income, changes in equity and cash flows for the reporting period as well as summary of significant accounting policies and methods and other explanatory information.

In our opinion, the accompanying separate and consolidated financial statements present fairly, in all material respects, the financial position of the Company DEPA COMMERCIAL S.A. and its subsidiaries (the Group) as at 31st December 2022, their financial performance and cash flows for the reporting period in accordance with International Financial Reporting Standards that have been adopted by the European Union.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs) incorporated into the Greek Legislation. Our responsibilities under those standards are described in the "Auditor's Responsibilities for the Audit of the Separate and Consolidated Financial Statements" section of our report. We are independent of the Company and its consolidated subsidiaries within our entire appointment in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) incorporated into the Greek Legislation and ethical requirements relevant to the audit of separate and consolidated financial statements in Greece and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of Management for the separate and consolidated financial statements

Management is responsible for the preparation and fair presentation of the separate and consolidated financial statements in accordance with International Financial Reporting Standards that have been adopted by the European Union and for such internal control as management determines is necessary to enable the preparation of separate and consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate and consolidated financial statements, management is responsible for assessing the Company's and the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the management's intention is to proceed with liquidating the Company and the Group or discontinuing their operations or unless the management has no other realistic option but to proceed with those actions.

Auditor's responsibilities for the audit of the separate and consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the separate and consolidated financial statements as an aggregate are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs, incorporated into the Greek Legislation, will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these separate and consolidated financial statements.

As part of an audit in accordance with ISAs, incorporated into the Greek Legislation, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the separate and consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's and the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's and the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the separate and consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company and the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the separate and consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding financial information of entities or business activities within the Group for the purpose of expressing an opinion on the separate and consociated financial statements to be able to draw reasonable conclusions on which to base the auditor's opinion. Our responsibility is to design, supervise and perform the audit of the Company and the Group. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Report on Other Legal and Regulatory Requirements

1. Board of Directors' Report

Taking into consideration that management is responsible for the preparation of the Board of Directors' Report which also includes the Corporate Governance Statement, according to the provisions of paragraph 5 of article 2 (part B) of L. 4336/2015, we note the following:

a) In our opinion the Board of Directors' Report has been prepared in accordance with the legal requirements of articles 150 and 153, Law 4548/2018 and the content of the Board of Directors' report is consistent with the accompanying separate and consolidated financial statements for the year ended 31.12.2022.

b) Based on the knowledge we obtained during our audit about the Company "DEPA COMMERCIAL S.A." and its environment, we have not identified any material inconsistencies in the Board of Directors' Report.

2. Unbundled Financial Statements

Management is responsible for the preparation of the Company's unbundled financial statements in accordance with the provisions of Article 141, Law 4001/2011 and No. 162/2019 and 541/2019

decisions of the Regulatory Authority of Energy (RAE) as well as for those internal controls that the Management determines as necessary, in order to enable the preparation of the unbundled statements of financial position as of December 31, 2022 and the Company's unbundled Income Statements before tax for the period from January 1, 2022 to December 31, 2022, that are free from material misstatement, whether due to fraud or error. The methodology used for the preparation of the unbundled financial statements is described in Note 47 to the separate and consolidated financial statements.

In our opinion, the Company's unbundled financial statements as of December 31, 2022, as presented in the relevant Note to the separate and consolidated financial statements, have been prepared in accordance with the provisions of Article 141 of Law 4001/2011 and No. 162/2019 and 541/2019 decisions of the Regulatory Authority for Energy (RAE).

Athens, 02 August 2023 The Certified Public Accountant

Elpida Leonidou Registry Number SOEL 19801



IV.ANNUAL SEPARATE AND CONSOLIDATED FINANCIAL STATEMENTS FOR THE FY ENDED AS AT DECEMBER 31st 2022 (1 January 2022 - 31 December 2022)

In accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union

The accompanying Annual Separate and Consolidated Financial Statements were approved by the Board of Directors of DEPA COMMERCIAL S.A. on 02 August 2023 and are posted on the <u>www.depa.gr</u>.

STATEMENT OF COMPREHENSIVE INCOME

		GRO	UP	COMPAN	IY
		01/01/-	01/01/-	01/01/-	01/01/-
	Note	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Turnover (sales)	6	4.826.555.042	1.696.903.819	4.252.313.408	1.417.142.117
Cost of sales	7	(4.650.487.276)	(1.414.177.687)	(4.149.744.693)	(1.164.805.853)
Gross profit		176.067.766	282.726.131	102.568.714	252.336.264
Administrative expenses	8	(21.973.114)	(18.462.483)	(15.050.825)	(12.665.490)
Distribution expenses	9	(35.319.380)	(21.358.982)	(20.247.107)	(8.715.949)
Other (expenses) / income	10	(55.084.922)	88.372.987	(45.154.107)	84.182.549
Income from amortization of grants	15	155.957	153.438	155.957	153.438
Profit / (Loss) from foreign exchange rate differences	11	6.197.037	1.419.048	6.197.037	1.419.048
Operating results		70.043.344	332.850.138	28.469.669	316.709.859
Profit/ (Loss) from associates & jointly controlled investments	13	3.047.348	(372.829)	-	-
Investment Income	22	-	-	5.413.828	10.258.836
Financial expenses	12	(10.818.113)	(2.052.269)	(8.614.259)	(1.383.694)
Financial income	12	13.693.290	9.928.335	11.660.411	9.371.189
Profit before tax		75.965.869	340.353.374	36.929.649	334.956.190
Income tax	14	(26.397.782)	(77.591.193)	(15.882.560)	(74.688.925)
Profit after tax from continuing operations		49.568.088	262.762.182	21.047.089	260.267.265
Profit after tax from discontinued operations		0	11.305.750	0	0
Profit after tax from continuing and discontinued operations		49.568.088	274.067.932	21.047.089	260.267.264
Other Comprehensive Income/(loss)					
Amounts not reclassified in the Income Statement					
Actuarial profit/(loss)		111.927	(19.301)	80.776	(18.459)
Income tax related to actuarial loss		(24.624)	30.499	(17.771)	30.362
Financial Assets Valuation		(6.688.738)	(12.567.261)	(132.952)	(14.334.218)
Reclassification of risk hedges through the Statement of Comprehensive Income		13.001.342	(1.848.567)	14.246.318	87.900
Income Tax related to valuation of Financial Assets		(1.388.773)	3.175.527	(3.104.941)	3.134.190
Other Comprehensive Income after tax		5.011.134	(11.229.102)	11.071.431	(11.100.225)
Total Comprehensive Income		54.579.222	262.838.830	32.118.520	249.167.040

* The accompanying notes, presented on pages 48 to 136 constitute an integral part of these Financial Statements.

STATEMENT OF FINANCIAL POSITION

		GR	OUP
		31/12/2022	31/12/2021
ASSETS			
Non-current assets	Note		
Goodwill	16	14.635.563	14.635.563
Property, plant and equipment	17	17.341.256	13.445.357
Investment property	18	3.292.725	3.454.063
Intangible assets	19	97.924.585	42.385.029
Right-of-use assets	20	1.407.876	2.180.277
Investments in joint ventures & associates	22	18.105.821	32.558.490
Investments in securities	22	143.000	-
Other long-term receivables	24	25.959.222	9.643.940
Deferred tax asset	23	10.939.550	8.397.769
Total non-current assets		189.749.598	126.700.488
Current assets			
Inventories	25	174.739.718	98.709.042
Trade and other receivables	27	767.720.207	578.183.038
Derivatives	41	-	-
Cash and cash equivalents	26	199.702.349	265.891.965
Total current assets		1.142.162.273	942.784.045
TOTAL ASSETS		1.331.911.871	1.069.484.533
EQUITY & LIABILITIES			
EQUITY			
Share capital	28	17.518.199	17.518.199
Reserves	29	264.833.099	252.531.806
Retained earnings		321.124.923	369.460.496
Total Equity		603.476.221	639.510.501
LIABILITIES			
Long-term liabilities			
Other Provisions	34	488.276	100.000
Government grants	33	2.835.979	2.994.456
Employee defined benefits obligations	31	795.253	970.647
Lease liabilities	32	1.030.621	1.338.006
Other long-term liabilities	35	30.884.620	29.732.498
Total long-term liabilities		36.034.749	35.135.607
Short-term liabilities			
Trade and other payables	36	628.320.575	318.065.743
Lease liabilities	32	474.663	965.536
Derivatives	41	7.900.989	14.213.593
Loan	37	6.000.000	4.000.000
Income tax payable	-	49.548.716	57.440.115
Government grants	33	155.957	153.438
Total short-term liabilities		692.400.900	394.838.425
Total liabilities		728.435.650	429.974.032

* The accompanying notes, presented on pages 48 to 136 constitute an integral part of these Financial Statements.

STATEMENT OF FINANCIAL POSITION

STATEMENT OF FINANCIAL POSITION		COMPANY			
ASSETS		31/12/2022	31/12/2021		
Non-current assets	Note		•		
Property, plant and equipment	17	16.491.276	12.494.252		
Investment property	18	3.292.725	3.454.063		
Intangible assets	19	195.955	1.593.792		
Right-of-use assets	20	231.927	695.334		
Investments in subsidiaries	22	107.812.050	48.254.133		
Investments in joint ventures and associates	22	15.540.623	33.040.640		
Investments in securities	22	143.000	-		
Other long-term receivables	24	24.611.645	8.324.793		
Deferred tax assets	23	13.513.242	16.291.447		
Total non-current assets	20	181.832.443	124.148.454		
Querrant accords					
Current assets	25	470 500 005	00 700 0 40		
Inventories	25	173.599.335	98.709.042		
Trade and other receivables	26	613.854.077	466.064.623		
Cash and cash equivalents	20	178.848.526	249.224.389		
Total current assets		966.301.938	813.998.054		
TOTAL ASSETS		1.148.134.381	938.146.508		
EQUITY AND LIABILITIES					
EQUITY					
Share capital	28	17.518.199	17.518.199		
Reserves	29	269.100.993	251.424.324		
Retained earnings		264.848.924	341.020.575		
Total Equity		551.468.116	609.963.098		
LIABILITIES					
Long-term liabilities					
Government grants	33	2.835.979	2.994.456		
Employees defined benefits obligations	31	727.416	899.945		
Lease liabilities	32	135.490	160.208		
Other long-term liabilities	35	33.600	33.600		
Total long-term liabilities		3.732.485	4.088.209		
Short-term liabilities					
Trade and other payables	36	554.370.892	252.804.797		
Lease liabilities	32	102.322	558.990		
Derivatives	41	132.952	14.246.318		
Income tax payable		38.171.657	56.331.658		
Government grants	33	155.957	153.438		
Total short-term liabilities					
		592.933.780	324.095.201		
Total liabilities		596.666.265	328.183.410		
TOTAL EQUITY AND LIABILITIES		1.148.134.381	938.146.508		

* The accompanying notes, presented on pages 48 to 136 constitute an integral part of these Financial Statements

STATEMENT OF CHANGES IN EQUITY OF THE GROUP

	Share capital	Statutory reserves	Special dividend reserves	Reserve from translation of capital in euro	Extraordinary reserves	Tax exempted reserves	Risk hedging reserves	Other changes	Retained earnings	Total
Balance as at 1 January 2021	100.922.101	60.821.370	101.407.265	12.228	81.228.031	1.459.942	153.698	-	120.719.489	466.724.125
Profit after tax 1/1-31/12/2021	-	-	-	-	-	-	-	-	274.067.932	274.067.932
Other comprehensive income	-	-	-	-	-	-	(11.240.301)	-	11.199	(11.229.102)
Total comprehensive income	-	-	-	-	-	-	(11.240.301)		274.079.131	262.838.830
Transactions with shareholders recognised directly in equity:										
Transfer to reserves	-	521.978	18.112.065		-	62.128	-	-	(18.696.171)	-
Dividends for the period	-	-	-		-	-	-	-	(6.641.953)	(6.641.953)
Other changes Decrease in share capital	- (83.403.902)	-	-	_	-	-	-	(6.600)	-	(6.600) (83.403.902)
Total Transactions with shareholders	(83.403.902)	521.978	18.112.065			62.128		(6.600)	(25.338.125)	(90.052.455)
Balance as at 31 December 2021	17.518.199	61.343.348	119.519.330	12.228	81.228.031	1.522.070	(11.086.603)	(6.600)	369.460.496	639.510.501
Balance as at 51 December 2021	17.518.199	01.343.348	119.519.550	12.228	61.228.031	1.522.070	(11.080.003)	(8.800)	309.400.490	039.510.501
Balance as at 1 January 2022	17.518.199	61.343.348	119.519.330	12.228	81.228.031	1.522.070	(11.086.603)	(6.600)	369.460.496	639.510.501
Profit after tax 1/1-31/12/2022	-	-	-	-	-	-	-	-	49.568.088	49.568.088
Other comprehensive income	-	-	-	-	-	-	4.923.831	-	87.303	5.011.134
Total comprehensive income	-	-	-	-	-	-	4.923.831	(6.600)	49.655.391	54.579.222
Transactions with shareholders recognised directly in equity:										
Transfer to reserves	-	709.218	6.668.243	-	-	-	-	-	(7.377.462)	-
Dividends for the period	-	-	-	-	-	-	-	-	(90.613.502)	(90.613.502)
Other changes	-	-		-	-	-	-	-	-	-
Total Transactions with shareholders		-	6.668.243	-	-	-	-	-	(97.990.964)	(90.613.502)
Balance as at 31 December 2022	17.518.199	62.052.566	126.187.573	12.228	81.228.031	1.522.070	(6.162.772)	(6.600)	321.124.923	603.476.221

The accompanying notes, presented on pages 48 to 136 constitute an integral part of these Financial Statements.

STATEMENT OF CHANGES IN EQUITY OF THE COMPANY

	Share capital	Statutory reserves	Special dividend reserves	Reserve from translation of capital in euro	Extraordinary reserves	Tax exempted reserves	Risk hedging reserves	Retained earnings	Total
Balance as at 1 January 2021	100.922.101	60.210.673	101.407.265	12.228	81.228.031	1.504.062	-	105.557.553	450.841.913
Profit after tax 1/1-31/12/2021	-	-	-	-	-	-	-	260.267.265	260.267.265
Other comprehensive income	-	-	-	-	-	-	(11.112.128)	11.903	(11.100.225)
Total comprehensive income	-	-	-	-	-	-	(11.112.128)	260.279.168	249.167.040
Transactions with shareholders recognised									
directly in equity:									
Transfer to reserves	-	-	18.112.065	-	-	62.128	-	(18.174.193)	-
Dividends for the period	-	-	-	-	-	-	-	(6.641.952)	(6.641.952)
Partial division of infrastructure	(83.403.902)	-	-	-	-	-	-	-	(83.403.902)
Total Transactions with shareholders	(83.403.902)	-	18.112.065	-	-	62.128	-	(24.816.145)	(90.045.854)
Balance as at 31 December 2021	17.518.199	60.210.673	119.519.330	12.228	81.228.031	1.566.190	(11.112.128)	341.020.575	609.963.098
Balance as at 1 January 2022 Profit after tax 1/1-31/12/2022	17.518.199	60.210.673	119.519.330 -	12.228	81.228.031	1.566.190	(11.112.128)	341.020.575 21.047.089	609.963.098 21.047.089
Other comprehensive income	-	-	-	-	-	-	11.008.426	63.005	11.071.431
Total comprehensive income	-	-	-	-	-	-	11.008.426	21.110.094	32.118.520
Transactions with shareholders recognised directly in equity:									
Transfer to reserves	-	-	6.668.243	-	-	-		(6.668.243)	-
Dividends for the period	-	-	-	-	-	-		(90.613.502)	(90.613.502)
Total Transactions with shareholders	-	-	6.668.243	-	-	-	-	(97.281.746)	(90.613.502)
Balance as at 31 December 2022	17.518.199	60.210.673	126.187.573	12.228	81.228.031	1.566.190	(103.702)	264.848.924	551.468.116

The accompanying notes, presented on pages 48 to 136 constitute an integral part of these Financial Statements.

STATEMENT OF CASH FLOWS

	GROUP		СОМРА	NY
	1/1-31/12/2022	1/1-31/12/2021	1/1-31/12/2022	1/1-31/12/2021
Cash flows from operating activities:				
Profit before tax	75.965.869	340.353.374	36.929.649	334.956.190
Plus (less) adjustments for:	-	-	-	-
Depreciation	5.943.139	5.682.433	2.015.418	2.007.485
Provisions	17.368.013	8.245.601	6.765.822	4.861.981
Write-offs of other receivables (see Note 10)	39.084.693	-	39.084.693	-
(Gains)/ Losses from joint ventures and associates	(3.047.348)	372.829	-	-
Write-offs of intangible assets	1.775.355	-	1.735.358	-
Write-offs of property, plant and equipment	768	-	-	-
Income from dividends	-	-	(5.413.828)	(10.258.836)
Amortization of grants	(155.957)	(153.438)	(155.957)	(153.438)
Transfers of grants	-	-	-	-
Exchange Rate Differences	(5.375.316)	(565.855)	(5.375.316)	(565.855)
Finance Income/ Expenses	(2.875.177)	(7.876.066)	(3.046.152)	(7.987.495)
Other non-cash changes	4	1.962	-	1.058
	128.684.043	346.060.842	72.539.686	322.861.090
Plus / less adjustments for changes in working capital or related to operating activities				
Decrease / (increase) in inventory	(76.030.676)	(53.265.193)	(74.890.293)	(53.265.193)
Decrease / (increase) in receivables	(199.454.871)	(222.759.019)	(149.584.268)	(153.451.647)
Decrease / (increase) in long-term receivables	(16.305.949)	(4.612.252)	(16.286.852)	(4.635.350)
(Decrease) / increase in liabilities (less banks)	221.161.087	(3.137.484)	211.892.433	(24.491.902)
Cash flows from operating activities	58.053.634	62.286.891	43.670.706	87.016.998
Interest and related expenses paid	(10.780.447)	(1.996.756)	(8.614.259)	(1.383.694)
Tax paid	(71.791.504)	(19.607.293)	(68.451.451)	(16.522.368)
Net cash inflows/(outflows) from operating activities of continuing operations (a)	(24.518.316)	40.682.842	(33.395.003)	69.110.936
Cash flows from investing activities:				
(Payments) for investment in subsidiaries & other investments	(37.710.987)	(7.736.023)	(37.710.987)	(7.736.023)
(Payments) for share capital increase in subsidiaries & joint ventures	-	(200.000)	(865.600)	(200.000)
Collections from disposal of joint venture	-	-	-	-
Purchases of tangible and intangible assets	(7.433.775)	(5.603.924)	(5.725.217)	(4.393.018)
Collections from investments in fixed assets grants	-	-	-	-
Dividends collected	-	-	5.413.828	10.258.836
Interest collected	2.437.842	1.991.969	2.437.130	1.983.266
Net cash inflows/(outflows) from investing activities of				
continuing operations (b)	(42.706.920)	(11.547.978)	(36.450.847)	(86.939)
Cash flows from financing activities:				
Loan collections	1.092.247.050	20.000.000	834.247.050	-
Loan repayments	(1.090.247.050)	(16.000.000)	(834.247.050)	-
(Payments) of finance leases	(993.971)	(978.124)	(530.013)	(522.092)
Dividends payable	-	(6.641.952)		(6.641.952)
Total inflows/(outflows) from financing activities of continuing operations (c)	1.006.029	(3.620.076)	(530.013)	(7.164.044)
Net increase/(decrease) in cash and cash equivalents for the period (a)+(b)+(c)	(66.219.208)	25.514.788	(70.375.863)	61.859.953
Cash and cash equivalents in the beginning of the period	265.891.965	240.377.175	249.224.389	187.364.435
Cash and cash equivalents acquired in the period	29.592	-		
Cash and cash equivalents in the end of the period	199.702.350	265.891.965	178.848.526	249.224.389
	2007/02/000		2,010-01020	2.5122-1000

The accompanying notes, presented on pages 48 to 136 constitute an integral part of these Financial Statements.

NOTES TO THE FINANCIAL STATEMENTS

1. Description of the Group and the Company

DEPA Commercial SA and its subsidiaries (hereinafter referred to as "the Group") operate in Greece and their principal activity is the transport – distribution, sale of natural gas and electricity.

The parent Company of the Group, **DEPA Commercial SA** (hereinafter referred to as "DEPA SA" or "Company") was established in Greece in 1988 as a state-owned Societe Anonyme for the purpose of importing natural gas in the Greek energy market. The Company is located in Iraklio Attikis, at 92 Marinou Antipa Str.

According to article 3 of the Greek Law 2364/1995, as amended by Law 2992/2002, the Parent Company of the Group, DEPA SA was designated as the Operator of the National System of Transmission of Natural Gas (E.S.F.A.) within the entire territory of Greece. Under the aforementioned law, scheduling, construction, ownership and operation of the National System of Transmission of Natural Gas was assigned to DEPA.

The construction of the main pipeline was completed in 1996, and the sales to the first industrial clients started.

The National Natural Gas System Operator (DESFA S.A.) was established, following the provisions of article 7 of the law 3428/2005 on liberalization of the natural gas market. The sector of the National Natural Gas Transmission System was transferred from DEPA to DESFA S.A. through a spin-off. Under the new legal framework, DESFA S.A. takes over full control of the operation, management, exploitation and development of the E.S.F.A. The share capital of the subsidiary DESFA S.A. was by 100% covered by the Parent Company DEPA S.A.

Based on the above, assets and liabilities, relating to high pressure Transmission System, were transferred as of 30 June 2006 (date of spin-off) from DEPA S.A. to the newly established entity, DESFA S.A. The spin-off was completed following the Presidential Decrees 33/2007 and 34/2007 (Government Gazette A31/20.02.2007) and the establishment of DESFA S.A. on 30/3/2007.

Moreover, article 21 of the same Law, clarified that before the incorporation of DESFA S.A., the existing Gas Distribution Companies (EDA Thessaloniki S.A. and EDA Thessalia S.A.) to be merged with EDA Attikis S.A.. The merger was completed under the Ministerial Decree K2 18211/29.12.06, issued by the Greek Ministry of Development and the Prefecture of Athens decision No 39478/29.12.06. The geographical boundaries of operation of the new subsidiary "EDA S.A." formed upon merger, included the total geographical area, previously covered by the operations of the merged entities. Following the amendment to article 1 of the Articles of Association, EDA Attikis S.A. changed its legal title to EDA S.A.

According to article 32 of Law 2992/2002, the rights of networks use held by EDA companies were allowed to be transferred only to a Gas Supply Company (EPA S.A.) Therefore, for the distribution of gas to domestic, commercial and industrial consumers through medium and low pressure pipelines, owned by EDA S.A., three EPAs (EPA Attikis, EPA Thessaloniki and EPA Thessalia) operated in the geographical regions of Attica, Thessaloniki and Thessalia respectively.

The Boards of Directors of DEPA S.A. and EDA S.A. decided that the Parent Company DEPA S.A. should absorb the 100% owned subsidiary EDA S.A. at the transition Balance Sheet of 31 March 2010. On December 23, 2010, the competent Prefecture approved the absorption of the subsidiary by the parent.

According to Law 4336/2015 issued pursuant to Law 4001/2011, a plan for gradual and complete liberalization of the gas market was introduced. The overall liberalization process of the retail gas market included the separation of the activities of Distribution from the Supply activities and the creation of new entities for the activity of the Natural Gas Distribution until 1 January 2017 (separation process).

In the context of applying the existing legislation, the Supply Sectors of "THESSALONIKI GAS SUPPLY COMPANY S.A." and "THESSALIA GAS SUPPLY COMPANY S.A." were contributed to a new unified gas supply company ("THESSALONIKI - THESSALIA SUPPLY COMPANY S.A."), which was established on 27.12.2016.

Similarly, at EPA Attikis S.A., the Supply Sector was contributed to a new gas supply company "EPA Attikis S.A.", which was established on 02.01.2017.

The pre-existing companies EPA Attikis S.A. and EPA Thessaloniki S.A. were renamed to EDA Attikis S.A. and EDA Thessaloniki-Thessalia S.A.

Furthermore, the Extraordinary General Meeting of Shareholders of EPA Thessaloniki and EPA Thessalia, on 28 September 2016, decided on merger through absorption by the company "THESSALONIKI GAS SUPPLY COMPANY S.A." of the affiliated company "THESSALIA GAS SUPPLY COMPANY S.A." in order to establish a unified Gas Distribution Company (EDA) of Thessaloniki - Thessalia S.A.

Pursuant to the provisions of article 80A of Law 4001/2011, as introduced by article 4 of Law 4336/2015, and as amended and currently effective, on 2 January 2017 the spin-off of the gas Distribution sector of DEPA (excluding the networks of the areas of Attica, Thessalia and Thessaloniki) and the establishment, through the contribution of the detached sector, of a new company under the title Gas Distribution Company of Greece A.E. (DEDA), which was renamed Public Enterprise of Gas Distribution Networks Société Anonyme, was completed. In compliance with the provisions of paragraph 6 of the above Article 80A of Law 4001/2011, DEDA SA automatically and legally subrogated to all rights, obligations and legal relations of DEPA concerning the contributed gas Distribution sector, while this transfer is considered a quasi-universal succession.

On 20/07/2018, the disposal of 51% of the share capital of Thessaloniki Thessalia Gas Supply Company S.A. (ZENITH) was completed, by transfer of the respective shares from DEPA SA to Eni gas e luce S.p.A. (EGL). The transfer is carried out on the basis of the relevant Shares Purchase Agreement signed between DEPA SA and EGL on 16.05.2018 and following the approval of the transaction by the Hellenic Competition Commission in its decision as of 12.07.2018. The total consideration stood at Euro 57 million (including dividend for FY 2017).

In November 2018, the unanimous decision of the Competition Commission Plenary No. 672/2018 (November 2018), approved the acquisition of exclusive control (transfer from joint control to exclusive) by the Company of the companies a) EPA ATTIKIS and b) EDA ATTIKIS from Attiki Gas Company (100% subsidiary of Shell). In its decision, the Committee considered, pursuant to Article 8 (4-6) of Law 3959/2011, that although this disclosed concentration falls within the scope of Article 6 (1) of Law 3959/2011, it does not cast serious doubts on its compatibility with the requirements of the competition operation in the separate markets concerned.

The aforementioned approval constituted a prerequisite for the completion of the agreement between DEPA SA and Attiki Gas on acquisition by the Company of 49% at EPA ATTIKIS and of 49% at EDA ATTIKIS. On 30/11/2018, the Company already owned 51% of the investments of the aforementioned companies and consolidated them through the equity method as jointly controlled companies (joint ventures). Following the acquisition of 49%, it now holds 100% as the sole shareholder. On the same

date, the companies EPA ATTIKIS and EDA ATTIKIS are incorporated in the financial statements of the Group under the full consolidation method. On 27/11/2018, DEPA SA paid in cash a total of Euro 150 million to Attiki Gas from the Company's cash available. An amount of Euro 39 million was paid for the acquisition of 49% of EPA ATTIKIS and an amount of Euro 111 million for the acquisition of 49% of EDA ATTIKIS.

On 19 April 2018, HRADF S.A. and ELPE Boards of Directors decided to accept the proposal of Euro 535 million from Snam S.p.A., Enagás Internacional S.L.U. and Fluxys S.A. joint venture for disposal of 66% of the share capital of DESFA S.A. (31% participation of HRADF and 35% participation of ELPE). On 14 May 2018, the transfer of the (indirect) investment of "HELLENIC PETROLEUM S.A." in "NATIONAL GAS SYSTEM OPERATOR (DESFA) S.A." in the joint venture of the companies "Snam S.p.A.", "Enagás Internacional S.L.U." and "Fluxys S.A." was approved following an extraordinary general meeting. Under the Decision No. 235 of 25/6/2018, the Court of Audit approved the transaction, and on 13/7/2018 the European Commission granted its approval under the European Union Merger Regulation. On 20 July 2018, HRADF and ELPE as Vendors and "SENFLUGA Energy Infrastructure Holdings S.A." (a special purpose company established by the SNAM-Enagas-Fluxys joint venture) as a buyer signed the Disposal and Acquisition of Shares Agreement. As at the same date, the Shareholders' Agreement for the disposal of DESFA between SENFLUGA S.A. and the Hellenic Republic was signed. As at 28/09/2018, the General Meeting of shareholders of DEPA SA decided to decrease DEPA's share capital in kind for the purpose of transferring DEPA's shares to DESFA to the shareholders of HRADF and ELPE. Upon meeting all of the terms and conditions of the Disposal and Acquisition Agreement, the above transaction was successfully completed on 20 December 2018.

On March 9, 2019, Law 4602/2019 entered into force. Article 53 of the aforementioned Law amends Law 4001/2011, introducing, inter alia, the obligation for ownership separation of gas distribution networks from supply activities and, therefore, raising the obligation of corporate transformation of DEPA Group SA. On 03.12.2019, Law 4643/2019 entered into force, article 16 of which further amends Law 4001/2011, replacing, inter alia, article 80I, introduced under article 53 of Law 4602/2019, setting forth inter alia, the obligation for ownership separation of distribution/management of distribution network activity through partial separation of the infrastructure segment of DEPA S.A., and the obligation for spin-off of the International Projects Sector and its contribution to a new company under the title "DEPA International Projects Sector in accordance with the laws on corporate transformations, i.e. Law 4601/2019 and Law 4172/2013, and establishment of two new companies under the title "DEPA INFRASTRUCTURE S.A." to which the Infrastructure Segment is transferred and "DEPA INTERNATIONAL PROJECTS S.A." to which the International Projects Sector is transferred.

Following the completion of the partial demerge and spin-off according to the aforementioned, DEPA is renamed to "DEPA COMMERCIAL S.A." which together with its subsidiary "Attiki Gas Supply Company S.A." ("EPA") carries out the commercial operations (wholesale and retail) of natural gas. Under par. 8, Article 80I, for the purposes of partial demerge and spin-off, on 30.09.2019 DEPA S.A. prepared accounting statements of the Infrastructure Segment as well as the International Projects Segment, recording assets and liabilities including the reserves under Article 7, Law 2364/1995 pertaining to the particular segment, extraordinary reserves as well as of the reserves under Law 2065/1992.

The issued shares of the company DEPA INFRASTRUCTURE, upon its establishment, are delivered directly to the shareholders of DEPA S.A. in proportion to their participating rights in the capital of DEPA S.A.. DEPA INTERNATIONAL PROJECTS S.A. shares, upon its establishment, are delivered directly to the shareholders of DEPA COMMERCIAL S.A. and remain under its ownership for the period no later than of sixty (60) days before the last day for submission of binding offers for the acquisition by a private investor the DEPA COMMERCIAL S.A. and the non the sixtieth (60th) day above, the shares to be held by DEPA COMMERCIAL S.A. at DEPA INTERNATIONAL PROJECTS S.A. shall be transferred to

the shareholders of DEPA SA in proportion to their participating rights in the capital of DEPA S.A. through decreasing the share capital in kind as defined in Law 4548/2018. The decrease in the share capital in kind will be equal to the book value of the shares held by DEPA COMMERCIAL S.A. at DEPA INTERNATIONAL PROJECTS S.A. and notwithstanding the provisions of Article 31, paragraph 1, Law 4548/2018, no valuation of contributions in kind will be required, applied in compliance with the provisions of paragraph 16, article 54, Law 4172/2013.

On 30/04/2020 the establishment of "DEPA INFRASTRUCTURE S.A." was completed, following the registration and publication in the General Electronic Commercial Registry (G.E.MI.) of as at 27/04/2020 decision of DEPA's General Meeting of Shareholders on partial division of the infrastructure sector of DEPA and its transfer to the new company, as well as the relevant notarial deed.

DEPA INFRASTRUCTURE S.A. includes, among others, the investments of DEPA S.A. in the companies "ATTICA NATURAL GAS DISTRIBUTION COMPANY S.A.", "THESSALONIKI THESSALIA NATURAL GAS DISTRIBUTION COMPANY S.A." and "PUBLIC GAS DISTRIBUTION NETWORKS S.A. ".

On 11/05/2020 the establishment of "DEPA INTERNATIONAL PROJECTS S.A." was completed, following the registration and publication in the General Electronic Commercial Registry (G.E.MI.) of as at 04/05/2020 decision of DEPA's General Meeting of Shareholders on the spin-off of the International Projects Sector and its contribution to a new company, as well as the relevant notarial deed.

On 20/05/2020, the approval of the modification of the Company's title to DEPA Commercial S.A. (DEPA S.A.) was registered in GEMI in accordance with the relevant decision as at 12/05/2020 of the General Meeting of its shareholders.

On January 19, 2021, the process of transfer of the shares of "DEPA INTERNATIONAL PROJECTS" to the shareholders of the Company was completed based on the Extraordinary General Meeting of Shareholders of the Company on 12.11.2020. Following the completion of the above process, DEPA COMMERCIAL no longer participates indirectly in the companies "IGI POSEIDON SA" and "ICGB AD", which are direct participations of "DEPA INTERNATIONAL PROJECTS SA".

On January 29, 2021, DEPA signed a Share Purchase Agreement for the acquisition of a 49% stake in the share capital of NORTH SOLAR S.A., which is developing photovoltaic projects in Western Macedonia with a capacity of 499.61MW. On April 16, 2021, the Competition Commission, with its decision No. 733/2021, unanimously approved the acquisition by DEPA COMMERCIAL SA joint control over the company "NORTH SOLAR A.E.", through the acquisition of 49% of its share capital. On December 20, 2021, the private equity company under the title "ENERGY COMPETENCE CENTER PRIVATE EQUITY COMPANY" was established. DEPA participating interest in the aforementioned company equals 10% of its capital. (On 04/03/2022 DEPA paid its participation rate of \in 143,000). The company aims to promote innovation in domestic entrepreneurship, share facilities and equipment, exchange knowledge and expertise, create networks and implement research projects.

On 07.04.2022 the Board of Directors of DEPA Commercial S.A. decided to acquire 100% of the shares of the company under the title "NEW SPES CONCEPT SA". The Company develops projects for production of electricity from solar energy through photovoltaics (PV) in the wider area of Kozani, Larissa and Fokida.

On 05.10.2022 in the context of the implementation of the Business Plan 2020-2024 and 2021-2025, the Board of Directors of DEPA Commercial S.A. decided to acquire the remaining 51% of the share capital of the Company "North Solar S.A."

On 12.08.2022, in the context of the implementation of the Business Plan 2020-2024 and 2021-2025, the Board of Directors of DEPA decided to acquire 100% of the company under the title "NORTH SOLAR 1 S.A.". The Company develops projects for production of electricity from solar energy through photovoltaics (PV).

On 15.11.2022 the Board of Directors of DEPA Commercial S.A. decided to acquire 29% of the share capital of the company "Alexandroupolis Power Plant S.A.". The Company develops projects for production of electricity from natural gas. On 20.12.2022 the acquisition by DEPA of the percentage of 29% was completed. The company is planning the construction and operation of a modern Combined Cycle Unit fueled by natural gas, of capacity 840 MW in the area of Alexandroupolis. The remaining shareholders of the company are PPC at 51% and Damco Energy at 20%. The power plant will be directly connected to Gastrade's FSRU ("Floating Storage and Gasification Unit"), which is currently under construction. Thus, Alexandroupolis is turning into an energy junction of electricity and natural gas networks, with the potential of supplying the domestic market and neighboring countries. The construction and operation of the Alexandroupolis Power Plant will also contribute to meeting the European Green Deal targets and the transition to low-emission energy production. The equipment that will be installed in the plant is suitable for hydrogen combustion and can operate with mixed fuel.

The Company is an associate of Hellenic Petroleum Holdings S.A and is consolidated in the Financial Statements of Hellenic Petroleum Holdings S.A. under the equity method.

The key supplies of natural gas are secured until 2026 from Russia, through the state owned gas company "GAZPROM EXPORT" and until 2044 from Azerbaijan through the Azerbaijan Gas Supply Company (AGSC). Import of Make up Gas through Turkey from BOTAS company continues until the end of 2023. Liquefied natural gas (LNG) is mainly obtained from the Algerian state owned company "SONATRACH" under a long-term agreement expiring in 2021 and was renewed till end of 2023.

As at the year end, the Group's headcount stood at 114 persons and the Company's at 31 persons. (115 and 35 persons respectively as at 31.12.2021). The Group also receives services available through third parties.

The consolidated companies included in the consolidated Financial Statements, as well as their tax noninspected years are analytically presented in Note 21 and Note 40.3 to the Financial Statements.

Approval of Financial Statements

The accompanying annual separate and consolidated financial statements for the year ended December 31, 2022 were approved by the Board of Directors on 02/08/2023, are subject to the final approval of the General Meeting of shareholders, and are posted on the Company's website, <u>www.depa.gr</u>.

2. Framework for Preparation of Financial Statements

2.1. Basis for presentation of Financial Statements

The annual separate and consolidated financial statements as of 31st December 2022, covering the period from January 1st to December 31st 2022, have been prepared in accordance with International Financial Reporting Standards (IFRS) as issued by the International Accounting Standards Board (IASB) and the Interpretations as issued by the International Financial Reporting Interpretations Committee (IFRIC as adopted by the European Union until December 31st 2022.

The Group applies all the International Accounting Standards (IAS), International Financial Reporting Standards (IFRS) and their Interpretations pertaining to its operations. The relative accounting policies set out below in Note 3 have been applied consistently in all the presented periods.

2.2.Going concern

The Group's Management estimates that the Company and its subsidiaries have sufficient resources to ensure their ability to operate as a going concern in the foreseeable future.

The preparation of the financial statements based on the going concern principle is considered by the Board of Directors as fair, despite the risks faced by the Company and uncertainties arising from the macroeconomic environment, given that:

- (a) the Company and its subsidiary EPA ATTIKIS are profitable,
- (b) the Company and its subsidiary EPA ATTIKIS maintain a significant level of cash,
- (c) the working capital is positive.

Therefore, the Company and the Group are in position to collect their receivables and settle their liabilities.

2.3.Basis for measurement

The accompanying separate and consolidated financial statements as of 31st December 2022 have been prepared under the historical cost principle except for derivative financial instruments and investment in securities which are measured at fair value.

2.4.Use of estimates

Preparation of financial statements in accordance with IFRS, requires the Management of the Group to make certain estimates and judgments (Note 4) that affect the reported amounts of assets, liabilities and amounts of the Statement of Comprehensive Income, as well as related disclosures of contingent assets and liabilities at the financial statements preparation date. These estimates and judgments are based on past experience and other factors and data which are considered reasonable and are revised on a regular basis. The effect of the revisions of the adopted estimates and judgments is recognized in the year when they are realized or/and in forthcoming fiscal years if the revision affects not only the current, but also the forthcoming years.

3. Key Accounting Policies

The key accounting policies set out below have been applied consistently for the preparation of the accompanying annual financial statements:

3.1. Basis for consolidation

The annual consolidated financial statements of the Group as at 31 December 2022 include the Company, its subsidiaries, its jointly controlled entities and its associates.

Intra-group balances and transactions, as well as the profits of the Group, arising from intra-group transactions that have not been performed yet (at the Group level), are eliminated under the preparation of the consolidated financial statements.

The accounting policies of subsidiaries, jointly controlled entities and associates are amended, when necessary, so as to ensure consistency with those adopted by the Group. The reporting date of the financial statements of subsidiaries, jointly controlled entities and associates is the same as that of the parent company.

The subsidiaries financial statements are included in the consolidated financial statements from the date when the control has been acquired until the date when the control ceases to exist.

(a) Subsidiaries

Subsidiaries are all the companies, which the Parent Company of the Group controls directly or indirectly through holding the majority of shares of the company, in which the investment was made and which are fully consolidated (total consolidation). The Company obtains and exercises control through its ownership of the majority of the subsidiaries' voting rights. In order to define the control, the following conditions are examined, as defined in IFRS 10:

- i) The parent company has authority over the investee, since it can direct the related (operational and financial) activities. This is achieved through appointing the majority of the members of the Board of Directors and the directors of the subsidiary by the Management of the parent.
- ii) The parent company holds rights with variable returns from its investment in the subsidiary. Other non-controlled investments are greatly dispersed and therefore cannot materially influence decision-making.
- iii) The parent company may exercise its authority over the subsidiary to influence the amount of its profits. This is the result of decision-making on affiliate matters through controlling decision-making bodies (Board of Directors and Directors).

Changes in a parent's ownership interest in a subsidiary

In case of changes in a parent's ownership interest in a subsidiary, it is examined whether the changes result in a loss of control or not.

 When changes in a parent's ownership interest in a subsidiary do not result in a loss of control, they are accounted for as equity transactions (i.e. transactions with owners in their capacity as owners). In such circumstances, the carrying amounts of the controlling and non-controlling interests shall be adjusted to reflect the changes in their relative interests in the subsidiary. Any difference between the amount by which the non-controlling interests are adjusted and the fair value of the consideration paid or received shall be recognized directly in equity.

- In case the parents' ownership interest changes in such a way that there is loss of control, then the
 parent shall record the necessary accounting entries and recognize the result from the sale
 (derecognition of the assets, goodwill and liabilities of the subsidiary as of the date of loss of control,
 derecognition of the book value of non-controlling interests, determination of the result from the
 sale).
- When determining the sale result, any amount previously recognized in other comprehensive income in respect of that company is accounted for using the same method as would be applied by the Group in the event of direct sale of its assets or liabilities. That is to say, the amounts previously recognized in other comprehensive income are reclassified to the income statement.
- Following loss of control of a subsidiary, any investment in the former subsidiary is recognized according to the provisions of IFRS 9.

Investments in subsidiaries in the separate financial statements

Investments of the parent in its consolidated subsidiaries are measured at cost less any accumulated impairment losses, if effective. Impairment test is carried out in accordance with the provisions of IAS 36.

b) Joint arrangements

The Group applies IFRS 11 to all its joint arrangements. Under IFRS 11, joint arrangements are classified as joint operations or joint ventures, depending on the contractual rights and obligations of each investor. Jointly controlled entities are incorporated using the proportionate consolidation method in Company (if it is a joint operation) or the equity method (if it is a joint venture) in the Group.

Joint ventures: Joint ventures are accounted for using the equity method, under which participating interests in joint ventures are initially recognized at cost and subsequently readjusted in compliance with the Group's share of the profits (or losses) and other comprehensive income of the joint ventures. Under the joint venture model, joint venture schemes are the ones in which members have rights over the net assets of the investments and are liable up to the extent of their contribution to the capital of the company. If the Group's participating interest in joint venture losses exceeds the value of the participating interest, the Group discontinues recognizing further losses unless it has entered into commitments or has made payments on behalf of the joint venture. Allocation of operating results and other comprehensive results is proportional to the participating interest.

Unrealized gains on transactions between the Group and joint ventures are eliminated according to the Group's interest in joint ventures. Unrealized losses are also eliminated unless there is evidence of the transaction for impairment of the transferred asset.

Consolidation takes into account the percentage held by the Group and is effective as at consolidation date. The structure of the business scheme is the key and determining factor in determining accounting treatment.

Investments in joint ventures in the separate financial statements

Investments of the parent in joint ventures are measured at cost less any accumulated impairment losses, if effective. Impairment test is carried out in accordance with the provisions of IAS 36.

(c) Associates

Associates are entities over which the Group exercises significant influence, but does not exercise control. The Group's investments in associates are accounted for using the equity method. The assumptions used by the Group suggest that holding participating interest of between 20% and 50% of a company's voting rights implies a significant influence over the investee unless it can be clearly demonstrated that this is not the case. Investments in associates are initially recognized at cost and

then consolidated using the equity method. According to this method, investments in associates are recognized at cost plus any changes in the Group's participating interest after the initial acquisition date, excluding any provisions for impairment of those participating interests.

Consolidated statement of comprehensive income includes the proportion of the Group in the total income of associates. If the Group's participating interest in an Associate's loss exceeds the value of the participating interest, the Group discontinues recognizing further losses unless it has settled liabilities or made payments on the part of the affiliate and, in general, settled the payments arising from shareholding. If the associate subsequently produces profits, the investor starts recognizing its share of profits only if its share of profits equals the share of losses it had not recognized.

Unrealized gains on transactions between the Group and associates are eliminated according to the Group's participating interest in associates. Unrealized losses are eliminated unless the transaction provides evidence of impairment of the transferred asset.

Investments in associates in the separate financial statements

Investments of the parent in consolidated associates are measured at cost less any accumulated impairment losses. Impairment test is carried out in accordance with the provisions of IAS 36.

Analytical description of all subsidiaries, joint ventures and associates of the Group, as well a as the Group's participating interest, are disclosed in Note 21.

3.2. Business Combinations

Subsidiaries are fully consolidated (full consolidation) applying the acquisition method from the date when control over them has been acquired and cease to be consolidated from the date when such control is no longer effective. The acquisition of a subsidiary by the Group is accounted for using the acquisition method. As at the acquisition date, the acquirer recognizes the goodwill arising on the acquisition transaction as the excess between:

- the aggregation of (i) the transferred consideration, measured at fair value; (ii) the mount of any non-controlling interests in the acquiree (measured at fair value or the proportion of non-controlling interests in its net identifiable assets (iii) in a business combination that is completed in stages, the fair value at the date of acquisition of the acquirer's shareholding previously acquired in the acquiree, less
- the net fair value of the acquiree's identifiable assets and liabilities as at the acquisition date.

Goodwill is tested for potential impairment on annual basis and the balance between its carrying amount and recoverable amount is recognized as an impairment loss, burdening the income statement for the period.

The costs arising under acquisition of investments in subsidiaries (e.g. fees of consultants, lawyers, accountants, appraisers and other professional and advisory fees) are recognized as expenses and burden the income statement for the period when they are incurred.

Otherwise, when the acquiree acquires participating interest, in which, at the acquisition date, net value of assets and assumed liabilities exceeds the transferred consideration, then the issue is classified as a market opportunity. Following the necessary reviews, the excess arising from the above balance is recognized as profit in the income statement for the period.

Accounting policy regarding acquisition of entities that do not constitute a business under the provisions of IFRS 3 – Acquisition of assets

As a consequence of the acquisition of the companies "North Solar S.A.", "New Spes Concept S.A." and "North Solar 1 S.A.", which do not meet the term "business" under IFRS 3, the Company has developed the following accounting policy to account for the transaction.

In line with the provisions of IFRS 3 :Business Combinations", the Group determines whether a transaction or other event is a business combination by applying the definition in this IFRS, which requires that the assets acquired and liabilities assumed constitute a business. If the assets acquired are not a business, the reporting entity shall account for the transaction or other event as an asset acquisition. IFRS 3 defined "business" as an integrated set of activities and assets that is capable of being conducted and managed for the purpose of providing a return in the form of dividends, lower costs or other economic benefits directly to investors or other owners, members or participants. The accounting treatment of a business combination does not apply to acquisition of an asset (or group of assets) which does not constitute a "business".

In this context, if the entities acquired do not meet the definition of a business under IFRS 3:

- The acquirer shall identify and recognise the individual identifiable assets acquired (including those assets that meet the definition of, and recognition criteria for, intangible assets in IAS 38 Intangible Assets) and liabilities assumed. According to IFRS 3.2(b), the cost of the group should be allocated to the separate identifiable assets and liabilities based on their relative fair values at the acquisition date.
- No goodwill or a gain are recognized on a bargain purchase. The cost of the acquired asset (or group of assets) is allocated to the separate identifiable assets and liabilities based on their relative fair values at the acquisition date.
- Under IAS 12.15(b), deferred tax is not recognized upon initial recognition of an asset or liability in a transaction that is not a business combination. In this context, no deferred tax is recognized under acquisition of assets.
- Acquisition-related costs (advisory, legal, accounting, valuation and other professional or consulting fees) are recognized as expenses and charged to the income statement for the period in which they are incurred.
- Any contingent consideration provided by the Group is initially recognized at its fair value on the acquisition date. In business combinations, changes in the fair value of the contingent consideration that meet the conditions for their classification as an asset or liability are recognized in accordance with IFRS 9 in the income statement. In cases of acquisition of assets (when the definition of "business" is not met according to IFRS 3), changes in the fair value of the contingent consideration that meet the conditions for their classification as an asset or liability are recognized with a corresponding change in the value of the recognized asset (e.g. IAS 38). Any consideration recognized in equity is not redetermined and the subsequent settlement is accounted for in equity.

3.3. Functional and presentation currency and foreign currency translation

The Group's functional and presentation currency is Euro. Transactions in foreign currencies are translated into the respective functional currency at the exchange rates at the dates of the transactions. Monetary assets and liabilities denominated in foreign currencies are translated into the functional currency at the exchange rate at the reporting date in order to reflect the effective foreign currency translation rates.

Foreign exchange gains and losses arising from such transactions and from valuation of monetary assets and liabilities denominated in foreign currencies at year end, are recognized in the income statement.

3.4. Goodwill

Goodwill arises from acquisition of subsidiaries and associates or acquisition of control in a company. Goodwill is recognized as the balance between acquisition cost and fair value of assets, liabilities and contingent liabilities of the acquiree as at the acquisition date. In the case of a subsidiary's acquisition, goodwill is recorded as a separate asset, while in the case of an associate's acquisition, goodwill is included in the value of the Group's investments in associates.

Goodwill is allocated to Cash Generating Units (CGU) for impairment test. The allocation is made to the groups of units that are expected to benefit from the business combinations in which the goodwill was generated. Goodwill is subject to an impairment test on an annual basis, or sooner if there is relevant evidence. Impairment of goodwill is determined by estimating the recoverable amount of every CGU (or CGU group) to which the goodwill has been allocated. When the recoverable amount (defined as the higher of value in use and fair value less the required cost of sales) of the CGU is less than their carrying amount, including goodwill, an impairment loss is recognized. Impairment of goodwill cannot be reversed subsequently.

3.5. Property, plant and equipment

Property, plant and equipment are presented in the financial statements at acquisition value less a) accumulated depreciation and b) any impairment losses. The initial acquisition cost of property, plant and equipment includes the purchase price, any import tariffs and non-refundable purchase taxes, compensations due to expropriation and any costs necessary for the asset to become operational and ready for its intended use.

Subsequent expenditures incurred in relation to tangible fixed assets are capitalized only when they increase the future economic benefits expected to arise from the exploitation of the affected assets. All other costs of repairs, maintenance, etc. of the tangible assets are recorded in the expenses of the year in which they are incurred.

When an assets is withdrawn or disposed of, the relative cost and accumulated depreciation are written off from the corresponding accounts at the time of withdrawal or disposal and the related gains or losses are recognized in the income statement.

Assets under construction include fixed assets and are carried at cost. Assets under construction are not depreciated until the fixed asset is settled and put into operation. Depreciations are charged to the income statement under the straight-line depreciation method, over the estimated useful life of the fixed assets. Land is not depreciated. The estimated useful life of property, plant and equipment, per category, is as follows:

Plant, property and equipment	Useful Life (in years)		
Buildings – building facilities on third parties real estate	1 - 20		
Machinery and equipment	7 – 50		
Motor vehicles	5 – 7		
Fixtures and fittings	3 - 7		

Residual values and useful lives of fixed assets are reviewed at every reporting date on annual basis. When the book values of the tangible fixed assets are higher than their recoverable value, then the difference (impairment) is recognized directly as an expense in the income statement. Gains or losses on disposal of property, plant and equipment are determined, by the difference between the sale proceeds and the carrying amount.

3.6. Investment property

In this category, the Group recognizes buildings or parts of buildings and their proportion on the land, which are not used for its operational needs. These investments are initially recognized at acquisition cost, including the transaction costs associated with the acquisition. After initial recognition, they are measured at cost, less accumulated depreciation and any accumulated losses from impairment. Maintenance and repair costs of investment property are recognized in the statement of comprehensive income. For the calculation of depreciation, their useful life is set equal to that of owner occupied property.

3.7. Intangible assets

3.7.1 Software

Software refer to the acquisition cost of software. Expenditures that improve or extend the efficiency of software programs are recognized as capital expenditures and increase their initial cost.

Amortization of software is charged in the Statement of Comprehensive Income, under the straight-line method, over their useful lives. The estimated useful life is 1-3 years.

3.8. Impairment of non-current assets (goodwill and intangible assets, tangible assets and investment in consolidated companies)

For impairment estimating purposes, assets are classified into smaller groups of assets that can generate cash flows independently from other assets or Cash Generating Units of the Group (CGU). As a result, certain assets are tested for impairment on their own while others at Cash Generating Unit level. Goodwill is allocated to such Cash Generating Units, from which it is expected that benefits will arise from synergies relating to business combinations, and which represent the smaller level within the Group, where the Management monitors goodwill.

Cash Generating Units, to which goodwill has been allocated, are subjected to impairment testing, at least on an annual basis. All other separate assets or Cash Generating Units are subject to impairment testing when events or changes in conditions indicate that their book value may not be recoverable.

An impairment loss is recognized for the amount where the book value of an asset or a Cash Generating Unit exceeds its recoverable amount, which is the highest between fair value less sale costs and value in use. In order to define value in use, the Management defines the estimated cash flows for every Cash Generating Unit, defining a suitable discount rate in order to calculate the current value of these cash flows. The data used for the impairment test arise directly from recent calculations, approved by the Management, suitably adjusted in order not to include future reorganizations and improvements of assets. Discount factors are defined separately for every Cash Generating Unit and reflect the corresponding risk elements, defined by the Management on an individual basis.

The Cash Generating Units' impairment loss firstly decrease the book value of goodwill, allocated to

them. The remaining impairment loss is charged pro rata to the other assets of each Cash Generating Unit. With the exception of goodwill, all assets are subsequently reassessed for indications that the previously recognized impairment loss no longer exists. An impairment loss is reversed if the recoverable amount of a Cash Generating Unit exceeds its carrying value.

In respect of tangible and intangible fixed assets subject to amortization/depreciation, an impairment test is performed when events or changes in circumstances indicate that their carrying amount may no longer be recoverable. When the net book value of tangible and intangible fixed assets exceeds their recoverable amount, then the excess amount relates to an impairment loss and is recognized directly as an expense in the income statement.

Respectively, financial assets that are subject to impairment testing (if indicated) are assets measured at cost of acquisition or equity method (investments in subsidiaries, associates and joint operations). The recoverable amount of investments in subsidiaries and associates is determined in the same way as that in respect of non-financial assets.

Reversal of an impairment loss regarding non-current assets other than goodwill, recognized in prior periods, is conducted only when there is sufficient evidence that the impairment is no longer effective or has decreased. In such cases, the aforementioned reversal is recognized as income.

No impairment of the Group's assets was recorded in FY ended as at December 31st 2022.

- 3.9. Financial Instruments
 - 3.9.1. Recognition and derecognition

Financial assets and financial liabilities are recognized in the Statement of Financial Position when and only when the Group becomes a party to the financial instrument.

The Group ceases to recognize a financial asset when and only when the contractual rights to the cash flows of the financial asset expire or when the financial asset is transferred and the substance substantially transfers all the risks and benefits associated with the specific financial asset. A financial liability is derecognized from the Statement of Financial Position when, and only when, it is repaid - that is, when the commitment set out in the contract is fulfilled, canceled or expires.

3.9.2 Classification and initial recognition of financial assets

With the exception of trade receivables that do not include a significant finance item and are measured at the transaction price in accordance with IFRS 15, other financial assets are initially measured at fair value by adding the relevant transaction cost except in the case of financial assets measured at fair value through profit or loss.

Financial assets, except those defined as effective hedging instruments, are classified into the following categories:

- Financial assets at amortized cost,
- Financial assets at fair value through profit & loss, and
- Financial assets at fair value through other comprehensive income

Classification of every asset is defined according to:

- the Group's business model regarding management of financial assets, and
- the characteristics of their conventional cash flows.

All income and expenses related to financial assets recognized in the Income Statement are included in the items "Other financial results", "Financial expenses" and "Financial income", except for the impairment of trade receivables included in operating results.

3.9.3 Subsequent measurement of financial assets

Financial assets at amortized cost

A financial asset is measured at amortized cost when the following conditions are met:

- I. financial asset management business model includes holding the asset for the purposes of collecting contractual cash flows,
- II. contractual cash flows of the financial asset consist exclusively of repayment of capital and interest on the outstanding balance ("SPPI" criterion).

Following the initial recognition, these financial assets are measured at amortized cost using the effective interest method. In cases where the discount effect is not significant, the discount is omitted. The amortized cost measured category includes non-derivative financial assets such as loans and receivables with fixed or pre-determined payments that are not traded on an active market, as well as cash and cash equivalents, trade and other receivables.

• Financial assets measured at fair value through profit or loss

Financial assets at fair value through profit or loss include financial assets held for trading, financial assets designated at initial recognition at fair value through profit or loss, or financial assets that are required to be measured at fair value.

Financial assets are classified as held for trading if they are acquired for sale or repurchase in the near future. Derivatives, including embedded derivatives, are also classified as held for trading, unless defined as effective hedging instruments.

Financial assets with cash flows that are not only capital and interest payments are classified and measured at fair value through profit or loss, irrespective of the business model.

• Financial assets at fair value through comprehensive income (equity instruments)

In accordance with the relevant provisions of IFRS 9, at initial recognition, the Group may make an irrevocable election to present in other comprehensive income subsequent changes in the fair value of an investment in an equity instrument not held for trading.

Profit and loss arising from these financial assets is never recycled to the income statement for the period. Dividends are recognized as other income in the income statement when the right to payment has been established, unless the Group benefits from such income as a recovery of part of the cost of the financial asset, in which case such gains are recognized in the statement of comprehensive income. Equity instruments at fair value through comprehensive income are not subject to impairment test. This election is made for every equity instrument separately.

The Group has elected to classify investments in this category (see Note 22.3).

3.9.4 Impairment of financial assets

Adoption of IFRS 9 led to a change in the accounting treatment of impairment losses for financial assets, as it replaced the treatment of IAS 39 for recognition of realized losses by recognizing the expected credit losses.

Impairment is defined in IFRS 9 as an Expected Credit Loss (ECL), which is the difference between the contractual cash flows attributable to the holder of a particular financial asset and the cash flows expected to be recovered, i.e. cash deficit arising from default events, discounted approximately at the initial effective interest rate of the asset.

The Group and the Company recognize provisions for impairment for expected credit losses for all financial assets except those measured at fair value through profit or loss. The objective of the IFRS 9 impairment provisions is to recognize the expected credit losses over the life of a financial instrument whose credit risk has increased since initial recognition, regardless of whether the assessment is made at a collective or individual level, using all the information that can be collected on the basis of both historical and present data, as well as data relating to reasonable future estimates of the financial position of customers and the economic environment.

To facilitate implementation of this approach, a distinction is made among:

- financial assets whose credit risk has not deteriorated significantly since initial recognition or which have a low credit risk at the reporting date (Stage 1) and for which the expected credit loss is recognized for the following 12 months,

- financial assets whose credit risk has deteriorated significantly since initial recognition and which have no low credit risk (Stage 2). For these financial assets, the expected credit loss is recognized up to their maturity.

- financial assets for which there is objective evidence of impairment at the reporting date (Stage 3) and for which the expected credit loss is recognized up to maturity.

3.9.5 Classification and management of financial liabilities

As the accounting requirements for financial liabilities remained broadly similar to those set in IAS 39, the Group's accounting policies regarding financial liabilities were not affected by the adoption of IFRS 9.

The Group's financial liabilities include mainly borrowings, suppliers and other liabilities. After initial recognition, financial liabilities are measured at amortized cost using the effective interest method.

Financial liabilities are classified as short-term liabilities unless the Group has the unconditional right to transfer the settlement of the financial liability for at least 12 months after the financial statements reporting date.

In particular:

(i) Loan liabilities

The Group's loan liabilities are initially recognized at cost, which reflects the fair value of the amountsNotes to financial statements62

payable minus the relative costs directly attributable to them, where they are significant.

After initial recognition, interest bearing loans are measured at amortized cost using the effective interest method. Amortized cost is calculated by taking into account issuing expenses and the difference between the initial amount and the maturity. Gains and losses are recognized in profit or loss when the liabilities are derecognized or impaired through the amortization process.

(ii) Trade and other liabilities

Balance from suppliers and other liabilities is initially recognized at their fair value and subsequently measured at amortized cost using the effective interest method.

Trade and other short-term liabilities are not interest-bearing accounts and are usually settled on the basis of the agreed credits.

3.10 Assets available for sale

The Group and the Company classify a long-term asset or a group of long-term assets and liabilities as those held for sale if their carrying amount will be recovered principally through a sale transaction rather than through continuing use. Assets classified as held for sale are measured at the lower of their carrying amounts and fair values less costs to sell. Such costs constitute additional expenses that entirely pertain to the sale of the asset.

The basic requirements in order to classify an asset as held for sale is met when the sale is highly probable and the asset is directly available for sale in its current condition. The steps required to complete the sale should ensure that there is no significant likelihood of changes to the sale plan or that the sale decision will be revoked. Management should also be committed to the sale of the asset and the completion of the sale should be expected within the next year from the day the asset was classified as available for sale.

Starting from the date a long-term asset (or group of assets) is classified as held for sale, depreciation is not recognized on such asset.

Long-term assets (or groups of assets and liabilities) classified as available for sale are measured (after initial classification as above) at the lower of their carrying amount and their fair value less direct costs and the arising impairment losses are recognized in the income statement. Any potential increase in fair value at a later valuation is recognized in the income statement but not for an amount exceeding the initially recorded impairment loss.

Starting from the date a long-term asset (or group of assets) is classified as available for sale, depreciation is not recognized on such asset.

Assets, classified as available for sale and the corresponding liabilities are presented separately in the statement of financial position.

3.11 Non-current assets held for sale and discontinued operations

A discontinued operation is a component of an entity that either has been disposed of, or is classified as held for sale, and:

(a) represents a separate major line of business or geographical area of operations,

(b) is part of a single coordinated plan to dispose of a separate major line of business or geographical area of operations or

(c) is a subsidiary acquired exclusively with a view to resale.

An entity shall disclose:

(a) a single amount in the statement of comprehensive income comprising the total of:

(i) the post-tax profit or loss of discontinued operations and

(ii) the post-tax gain or loss recognised on the measurement to fair value less costs to sell or on the disposal of the assets or disposal group(s) constituting the discontinued operation.

(b) an analysis of the single amount in (a) into:

(i) the revenue, expenses and pre-tax profit or loss of discontinued operations;

(ii) the related income tax expense as required by paragraph 81(h) of IAS 12;

(iii) the gain or loss recognised on the measurement to fair value less costs to sell or on the disposal of the assets or disposal group(s) constituting the discontinued operation; and

(iv) the related income tax.

(c) net cash flows attributable to the operating, investing and financing activities of discontinued operations. These disclosures may be presented either in the notes or in the financial statements. These disclosures are not required for disposal groups that are newly acquired subsidiaries that meet the criteria to be classified as held for sale on acquisition.

An entity shall re-present the aforementioned disclosures for prior periods presented in the financial statements so that the disclosures relate to all operations that have been discontinued by the end of the reporting period for the latest period presented.

3.12 Inventory

The Group's inventories include mainly natural gas and materials used in the technical installations and spare parts which are used for its maintenance. Inventories are measured at the lower of acquisition or production cost and net realizable value. The Company's inventories are measured based on the moving average method which does not significantly differ from the weighted average method, applicable to the Group and the acquisition cost includes all necessary expenses incurred in order to bring inventories to their current location and consists of the purchase cost of construction and maintenance materials of the natural gas installations and the acquisition cost of natural gas.

3.13 Financial derivatives and risk hedging activities

In the context of risk management, the group uses derivative financial instruments on commodities to hedge the risks associated with future commodity price fluctuations. These derivative financial instruments are initially recognized at fair value as at the agreement date and are subsequently measured at their fair value. Financial derivatives are included in financial assets when their fair value is positive and in financial liabilities when their fair value is negative. Changes in the fair value of financial derivatives are recognized at every balance sheet date, either in the income statement or in other income/(loss), depending on whether the derivative financial instrument meets the conditions for hedge accounting and, if applicable, according to the nature of the hedging item.

The group classifies derivatives as hedging derivatives for a specific risk associated with a recognized financial asset or liability or a transaction that is highly probable (cash flow hedge).

As at the transaction date, the group records the relationship between the hedging instrument and the hedging item as well as the purpose of risk management and the strategy of implementation of hedging transactions.

In addition, the group records, both while generating a hedging transaction and subsequently the way of assessing the effectiveness of changes in the fair value of the instruments used in these transactions of hedging fluctuations in fair values or cash flows of hedging items. These hedging transactions are expected to be effective in offsetting fluctuations in the cash flows of hedging items and are reviewed on a regular basis to determine whether they are actually effective during the periods in which they have been used.

Future cash flows hedging

The component of changes in fair value, attributable to effective risk hedging, is recognized in equity. Any gain or loss arising from changes in fair value attributable to non-effective risk hedging is recognized directly in the income statement in the item "Other revenue (expenses) and other profit/(loss)". Cumulative amounts in equity are recycled through the Statement of Comprehensive Income to cost of sales in the periods in which the hedged item affects the result (when the hedged transaction is taking place).

When a cash flow hedge instrument expires, is sold, or no longer meets the cash flow hedge criteria, accumulated gains or losses in equity remain there until the projected transaction is finally recognized in the income statement.

In the event that a hedged transaction is no longer expected to be realized, accounting risk hedging is discontinued and accumulated profits or losses existing in the equity are directly transferred to "Other revenue (expenses) and other profit/(loss)".

3.14 Finance leases

The new accounting policies of the Group and the Company following the adoption of IFRS 16, effective from the date of initial application, are recorded below as follows:

3.14.1 Right-of-use assets

The Group and the Company recognize right-of-use assets at the commencement of the lease (the date the asset is available for use). Right-of-use assets are measured at cost less accumulated amortization and any impairment loss and adjusted for remeasurement of the corresponding lease liabilities. The cost of right-of-use assets includes the amount of lease liabilities recognized, the initial directly related costs and lease payments made on or before the commencement date, less the amount of discounts or other incentives offered. Recognized right-of-use assets are amortized on a straight-line basis over the shortest useful life of the identified asset and the terms of the lease agreement, except in cases where there is relative certainty that the leased asset will become property of the Company or the Group at the end of the lease. Right-of-use assets are subject to impairment test, either separately or as a cash-generating unit.

3.14.2 Lease liabilities

At the commencement of the lease, the Group and the Company recognize lease liabilities equal to the present value of the leases during the total lease term. Payments include contractual fixed rentals.

In order to calculate the present value of the payments, the Group and the Company use the borrowing cost at the effective date of the lease, in case the effective interest rate is not determined directly in the lease agreement. After the commencement of the lease, the amount of the lease liabilities is increased by interest expenses and decreases by the effected lease payments. In addition, the carrying amount of the lease liabilities is remeasured if there is a change in the agreement, or any change in the term of the agreement, fixed rentals or valuation of the asset.

(a) Short-term leases and leases of low value assets

The Group and the Company apply the exemption regarding short-term leases (i.e. leases of less than or equal to 12 months, from the date of the commencement of the lease agreement, where there is no option to purchase the underlying asset). They also apply the exemption to low value assets. Lease payments for short-term and low-value leases are recognized as fixed-line expenses over the lease term.

(b) Significant estimates in determining the lease term with the right to extend.

The Group and the Company determine the lease term as the contractual lease term, including the time period covered by (a) the option to extend the lease, if it is relatively certain that the option will be exercised or by (b) the option to terminate the contract, if it is relatively certain that the option will not be exercised.

Regarding some leases, the Group and the Company have the option to extend the term of the lease agreement. The Group and the Company evaluate whether there is relative certainty that the option to extend will be exercised, taking into account all the relevant factors that create financial incentive, to exercise the option to extend the lease term. After the date of the lease commencement, the Group and the Company reconsider the lease term, if there is a significant event or change in the circumstances that fall under their control and affect the option to exercise (or not) the option to extend the lease (such as a change in the Company's business strategy).

3.15 Share capital, reserves and distribution of dividends

Common shares are classified as equity. Incremental costs attributable to the issue of common shares are recognized as a deduction from retained earnings.

In particular, the reserves are divided into:

Statutory reserves

In compliance with the Greek Commercial Law, companies shall transfer at least 5% of their annual net profits to a statutory reserve until such reserve equals 1/3 of the paid-up share capital. This reserve cannot be distributed during the Company's operations.

Special reserves

Special dividends reserves pertain to collectible dividends recognized in a special reserves account under Article 48, Law 4172/2013.

Taxed reserves

Taxed reserves have been formed based on the relevant decisions of the General Meetings.

Tax Exempted Reserves under legislation

Reserves arising from revenue taxed in a special way (interest on deposits) have been recognised)

3.16 Income Tax

Current income tax

Current income tax is calculated in accordance with the tax legislation effective in Greece. Current income tax expense comprises the expected tax on the taxable income for the year and any adjustment included in tax statements, additional taxes arising from law provisions or tax audits by tax authorities and provisions for additional taxes and surcharges for unaudited periods. It is calculated using the tax rates effective as at the financial statements date.

Deferred Income Tax

Deferred tax is calculated using the balance sheet method, based on temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes. If the deferred tax results from the initial recognition of an asset or a liability in a transaction other than a business combination, it affects neither accounting nor taxable profit or loss and, therefore, it is not taken into account.

Deferred tax assets are recognized for all deductible temporary differences, unused tax losses, and taxfree discount reserves from investment laws to the extent that it is probable that future taxable profits will be available against which they can be utilized.

The carrying amount of deferred tax assets is reviewed at every financial statements date and is and reduced to the extent that it is unlikely that there will be sufficient taxable profits against which part or all of the deferred tax assets may be used.

3.17 Employee benefits

(a) Short term benefits

Short-term employee benefits are expensed as the related service is provided.

(b) Defined Contribution Plan

A defined contribution plan is a post-employment plan under which the Company pays a fixed amount to a third party without any other legal or constructive obligation. Obligations for contributions to defined contribution plans are expensed as the related service is provided.

(c) Defined Benefit Plan

A defined benefit plan is any other pension plan other than a defined contribution plan. The liability that is recorded in the Statement of Financial Position regarding a defined benefit plan is equal to the present value of the commitment for the benefit less the fair value of the plan's assets, changes that arise from non-recognized actuarial gains and losses and past service costs. The calculation of defined benefit obligations is performed annually by a qualified actuary using the projected unit credit method. The discount rate is based on high rated corporate bonds of Eurozone.

Actuarial gains and losses arising from re-measurements of the net defined benefit liability due to change in actuarial assumptions, are recognized directly in Equity. Past service costs and net interest expense are recognized directly in the income statement.

(d) Employee end-of-service benefits

End-of-service benefits are paid when employees retire earlier than the normal date of retirement. Termination benefits are expensed when the Group can no longer withdraw the offer of those benefits or when it offers these benefits as an incentive for voluntary retirement. If benefits are not expected to be settled within 12 months of the reporting date, then they are discounted. In the case of employment termination under which the Group is unable to determine the number of employees who will take advantage of this incentive, these benefits are not accounted for but are disclosed as contingent liability.

3.18 Government grants

Government grants are initially recognized at fair value when there is reasonable assurance that the grants will be received and the Group will comply with all attached conditions. Grants that compensate the Group for expenses incurred, are recognized in the income statement on a systematic basis in the periods in which the related expenses are recognized. Grants relating to the purchase of property, plant and equipment are included in long-term liabilities as deferred income (regarding the component exceeding 12 months) and short-term liabilities. Grants are recognized as income and are carried to the income statement during he useful life of the subsidized assets.

3.19 Provisions and Contingent Assets and Labilities

Provisions are recognized when the Group has a present legal or constructive obligation, as a result of a past event and it is likely that an outflow of resources will be required to settle the obligation, and a reliable estimate of the liability amount can be made. Provisions are reviewed at each reporting date and are adjusted accordingly in order to reflect the present value of the expenditure to be disbursed when the liability is settled. Provisions that are expected to be utilized in the long-term, if the time value of money is significant, are determined by discounting the expected future cash flows at a pre-tax rate that reflects current market assessments of the time value of money and the risks specific to the liability. Contingent liabilities are not recognized in the financial statements but are disclosed, unless the possibility of an outflow of resources that incorporate economic benefits is increased and the amount can be measured reliably. Contingent assets are not recognized in the financial statements, but are disclosed, where an inflow of economic benefits is probable.

3.20 Trade and other payables

Balances of trade and other payables are recognized at cost which is equal to the fair value of future payments for the purchases of goods and services. Trade and other short-term liabilities are non-interest-bearing accounts and are usually settled within 60 days.

3.21 Revenue

IFRS 15 established the core principle by applying five following steps for identifying revenue from contracts with customers:

- 1. Identify the contract(s) with a customer.
- 2. Identify the performance obligations in the contract.
- 3. Determine the transaction price.

- 4. Allocate the transaction price to the performance obligations in the contract.
- 5. Recognize revenue when (or as) the entity satisfies a performance obligation.

Revenue is recognized at the amount by which an entity expects to have in exchange for the transfer of the goods or services to a counterparty. When awarding a contract, account shall be taken of the additional costs and the direct costs required to complete the contract.

Income is defined as the amount that an entity expects to be entitled to in exchange for the goods or services it has transferred to a customer. If the promised consideration in a contract includes a variable amount, the entity estimates the consideration amount that would be entitled to the transfer of the promised goods or services to customer. The consideration amount may vary due to discounts, price subsidies, refunds, credits, price reductions, incentives, additional performance benefits, penalties or other similar items. Promising consideration may also change if the entity's entitlement to the consideration depends on the occurrence or nonoccurrence of a future event. For example, a consideration amount will be variable if the product has been sold with a refund or if a fixed amount promise has been given as an additional performance benefit to achieve a specific milestone.

The volatility associated with the consideration promised by a customer may be expressly stated in the contract. An entity shall measure the amount of the variable consideration using one of the following methods, whichever method it considers best suited to the amount of consideration to which it will be entitled to:

- (a) Estimated value the estimated value is equal to the sum of the probability-weighted amounts in a range of possible consideration amounts. Estimated value is an appropriate estimate of the variable amount if the entity has a large number of contracts with similar characteristics.
- (b) Potential amount the most probable amount is the only most probable amount in a range of possible consideration amounts (i.e., the only likely outcome of the contract). The most probable amount is an appropriate estimate of the variable amount if the contract has only two possible outcomes (for example, the entity provides additional performance or not).

Revenue from rendering services is based on the completion stage, determined by reference to the services rendered so far as a percentage of the total services offered. Revenue from sale of goods is recognized when the significant risks and rewards of ownership of the goods are transferred to the buyer.

The Group and the Company recognize revenues when they satisfy the performance of a contractual obligation by transferring the goods or services under that obligation.

The Group's main categories of revenue are the following:

(i) Sale of gas/ electric energy

The Group invoices its customers for gas supply/electric energy (wholesale, retail, gas-powered vehicles, auctions) at each period-end. At year end, revenue is accrued, based on estimates relating to the settlement of issued bills, in accordance with the signed agreements with the customers, and the retrospective settlements of differences in issued bills, based on signed agreements.

(ii) Income from dividends

Income from dividends is recognized in profit and loss as revenue on the date on which dividends distribution is approved by the General Meeting.

3.22 Interest income

Interest income is recognized as it accrues using the effective interest rate method under the corresponding interest calculation period.

3.23 Expenses

3.23.1 Cost of financing

Net cost of financing relates to accrued interest expense on borrowings, measured using the effective interest rate method.

3.24 Accounting treatment of expenses

Expenses are recognized in the profit and loss on an accrual basis. Payments for operating leases are recognized in profit and loss over the term of the lease.

3.25 Earnings per share

Basic earnings per share are calculated by dividing the net profits of the period with the weighted average number of ordinary shares in issue during the period.

3.26 Profit and loss from discontinued operations

A discontinued operation is a component of the Group that is either disposed of or classified as held for sale and

• represents a separate major line of business or geographical area of operations,

• is part of a unified, coordinated disposure plan for a large part of business or geographical area of operations or

• is a subsidiary acquired exclusively with a view to be resold.

Profit or loss from discontinued operations, including profit or loss of the comparative period are presented as a separate line in the Income Statement. This amount constitutes the after tax results of discontinued operations and after-tax profit or loss resulting from the valuation and disposal of the assets classified as held for sale.

The disclosures of discontinued operations of the comparative period include disclosures for earlier periods presented in Financial Statements so that the disclosures relate to all the operations that have been discontinued until the last date of the latest period presented. In cases where operations, previously classified as discontinued operations, are now continuing operations, disclosures of the prior periods are adjusted accordingly.

4. Use of estimates and assumptions

The preparation of financial statements in accordance with IFRS requires the Group's management to make estimates and assumptions that affect the balances of assets, liabilities, income and expenses and disclosures of contingent assets and liabilities at the date of the financial statements. Estimates and assumptions are based on past experience and other factors and data which are considered reasonable and are reviewed on an ongoing basis. The effect of revisions to estimates are recognized in the period in which they take place or even in the following periods if the revision affects not only the present but also the following periods.

The Group's Management makes estimates, assumptions and judgments, in order to select the most appropriate accounting principles in relation to future events and transactions. These estimates and assumptions are reviewed on an ongoing basis to reflect the current risks and are based on the Group's Management prior experience in relation to the nature and materiality of the underlying transactions and events.

Significant accounting estimates and management assessments

The significant estimates and judgements that refer to facts and circumstances, the progress of which could materially affect the carrying amounts of assets and liabilities within the next 12 months are analyzed below as follows:

Business combinations

At initial recognition, the assets and liabilities of the acquired business are included in the consolidated Financial Statements at their fair value. Upon fair values measurements, the Management makes estimates on future cash flows; however, actual results may differ. Any change in the measurement after the initial recognition will affect the measurement of goodwill. Details on the acquired assets and liabilities are analyzed in Note 22.

Goodwill impairment tests and intangible assets with indefinite useful life

The Group carries out the relevant impairment test on goodwill and intangible assets with indefinite useful life derived from subsidiaries and associates, at least on an annual basis or in case of an indication for impairment, according to IAS 36. In order to determine whether there is impairment evidence, the value in use as well as the fair value less the sale cost of the business unit must be calculated.

Usually, methods such as present value of estimated cash flows are used along with valuations based on similar transactions or companies trading in active markets and the stock quotation. For the application of these methods, the Management is required to use information such as the subsidiary's forecasted future profitability, business plans as well as market data such as interest rates etc.

Impairment of other non-current assets

Depreciated tangible fixed assets and intangible assets and investments in consolidated companies are tested for impairment when events or changes in circumstances indicate that their carrying amount may not be recoverable. In calculating the value in use, the management estimates future cash flows from the cash-generating asset or unit and selects the appropriate discount rate to calculate the present value of future cash flows.

Estimates when calculating value under Cash Generating Units (CGU)

The Group conducts a related impairment test of investments in subsidiaries and associates whenever there is evidence of impairment in accordance with the provisions of IAS 36. If it is established that there are reasons for impairment, it is necessary to calculate value in use and fair value less costs to sell regarding every CGU. Recoverable amounts of CGUs are determined for impairment tests purposes, based on the value in use calculation, which requires making estimates. For the purpose of calculating value in use, estimated cash flows are discounted to their present value using a discount rate that reflects current market assessments of the time value of money as well as the risks associated with particular CGU.

Depreciated assets useful life

The Management examines the useful life of depreciated assets every financial year. On 31/12/2022, the Management estimates that the useful lives represent the anticipated remaining useful life of the assets.

Provisions for expected credit losses from trade receivables

The Group and the Company apply the simplified IFRS 9 approach to calculating expected credit losses, which measures the loss provision at an amount equal to the expected credit loss over the life of trade receivables. The Group and the Company have made provisions for doubtful debts in order to adequately cover the loss that can be reliably estimated and arises from such receivables. On regular basis, the Group's Management reviews the adequacy of the provision made for doubtful receivables in relation to its credit policies, taking into account the information provided by the Group's Legal Services, arising from the processing historical data and recent developments in the cases they handle. Post-dated receivables for which the credit period has expired are considered overdue. The receivables for which there is objective evidence that the Company will not recover part of its receivable are considered impaired and for this reason, a provision should be made.

Income Tax

The Group and the Company are subject to income tax in accordance with Greek tax legislation.

The provision for income tax based on IAS 12 is calculated by estimating the taxes to be paid to tax authorities and includes the current income tax for every financial year and a provision for additional taxes that might emerge in tax audits. Significant estimates are required in order to determine the total provision for income tax. For specific transactions and calculations, the final tax determination is uncertain. The Group recognizes liabilities for the forecasted tax issues based on calculations as to the extent to which additional tax will arise. In cases where the final tax amount differs from what had been initially recognized, the differences affect the provisions for income tax and deferred tax for the period when it had been determined.

Revenue recognition and accrued income

The Group and the Company make estimates for unbilled revenue of natural gas consumption. At year end, accrued revenue is recognised including estimates relating to the settlement of issued bills, in accordance with the signed agreements with the customers, and the retrospective settlements of differences in issued bills.

The method of calculation is reviewed on an ongoing basis to ensure conformity of the accounting

estimates recognized in the financial statements.

Defined benefit plans obligations

Defined benefit obligations are determined based on an actuarial report which uses assumptions on the discount rate, the future increase of salaries and pensions as well as the yield of any plan assets. Any change in these assumptions will impact the level of recognized obligations.

Provisions and contingent liabilities

The Group recognizes provisions when it considers that there is a present legal or constructive obligation, caused by past events and it is almost certain that its settlement will create an outflow of resources, the amount of which can be estimated reliably. Conversely, in cases where either the outflow is possible or cannot be estimated reliably, the Group does not recognize a provision but discloses the contingent liability, taking into account its significance. The estimate of the likelihood of the outflow and its amount are affected by factors outside the Group's control, such as court decisions, law implementation and the probability of default between counterparties when it comes to off-balance sheet items. The estimates, assumptions and criteria applied by the Group in making decisions which affect the preparation of the financial statements are based on historical data and assumptions which under present circumstances are considered reasonable. The estimates and criteria for making decisions are reassessed in order to take into account the current developments and the effects of any changes are recognized in the financial statements in the year they are incurred.

5. New standards, amendments and interpretations

The accounting policies, based on which the financial statements were prepared, are consistent with those used under the preparation of the Group and the Company financial statements for the year ended as at 31/12/2021, except for adoption of amendments to several standards, whose implementation is mandatory in the European Union for FYs starting on 01/01/2022 (see Notes 5.1 and 5.2).

5.1 New Standards, Interpretations, Revisions and Amendments to existing Standards that are effective and have been adopted by the European Union

The following new Standards, Interpretations and amendments to Standards have been issued by the International Accounting Standards Board (IASB), are adopted by the European Union, and their application is mandatory on or after 01/01/2021.

Amendments to IFRS 3 "Business Combinations", IAS 16 "Property, Plant and Equipment", IAS 37 "Provisions, Contingent Liabilities and Contingent Assets" and "Annual Improvements 2018-2020" (effective for annual periods starting on or after 01/01/2022)

In May 2020, the IASB issued a package of amendments which includes narrow-scope amendments to three Standards as well as the Board's Annual Improvements, which are changes that clarify the wording or correct minor consequences, oversights or conflicts between requirements in the Standards. More specifically:

- **Amendments to IFRS 3 Business Combinations** update a reference in IFRS 3 to the Conceptual Framework for Financial Reporting without changing the accounting requirements for business combinations.

- **Amendments to IAS 16 Property, Plant and Equipment** prohibit a company from deducting from the cost of property, plant and equipment amounts received from selling items produced while the company is preparing the asset for its intended use. Instead, a company will recognize such sales proceeds and related cost in profit or loss.

- Amendments to IAS 37 Provisions, Contingent Liabilities and Contingent Assets specify which costs a company includes when assessing whether a contract will be loss-making.

- **Annual Improvements 2018-2020** make minor amendments to IFRS 1 First-time Adoption of International Financial Reporting Standards, IFRS 9 Financial Instruments, IAS 41 Agriculture and the Illustrative Examples accompanying IFRS 16 Leases.

The amendments have no impact on the consolidated Financial Statements.

5.2 New Standards, Interpretations, Revisions and Amendments to existing Standards that have not been applied yet or have not been adopted by the European Union

The following new Standards, Interpretations and amendments of IFRSs have been issued by the International Accounting Standards Board (IASB), but their application has not started yet or they have not been adopted by the European Union.

• IFRS 17 "Insurance Contracts" (effective for annual periods starting on or after 01/01/2023)

In May 2017, the IASB issued a new Standard, IFRS 17, which replaces an interim Standard, IFRS 4. The aim of the project was to provide a single principle-based standard to account for all types of insurance contracts, including reinsurance contracts that an insurer holds. A single principle-based standard would enhance comparability of financial reporting among entities, jurisdictions and capital

markets. IFRS 17 sets out the requirements that an entity should apply in reporting information about insurance contracts it issues and reinsurance contracts it holds. Furthermore, in June 2020, the IASB issued amendments, which do not affect the fundamental principles introduced when IFRS 17 has first been issued. The amendments are designed to reduce costs by simplifying some requirements in the Standard, make financial performance easier to explain, as well as ease transition by deferring the effective date of the Standard to 2023 and by providing additional relief to reduce the effort required when applying the Standard for the first time. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have been adopted by the European Union with effective date of 01/01/2023.

• Amendments to IAS 1 "Presentation of Financial Statements" (effective for annual periods starting on or after 01/01/2023)

In February 2021, the IASB issued narrow-scope amendments that pertain to accounting policy disclosures. The objective of these amendments is to improve accounting policy disclosures so that they provide more useful information to investors and other primary users of the financial statements. More specifically, companies are required to disclose their material accounting policy information rather than their significant accounting policies. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have been adopted by the European Union with effective date of 01/01/2023.

Amendments to IAS 8 "Accounting Policies, Changes in Accounting Estimates and Errors: Definition of Accounting Estimates" (effective for annual periods starting on or after 01/01/2023)

In February 2021, the IASB issued narrow-scope amendments that they clarify how companies should distinguish changes in accounting policies from changes in accounting estimates. That distinction is important because changes in accounting estimates are applied prospectively only to future transactions and other future events, but changes in accounting policies are generally also applied retrospectively to past transactions and other past events. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have been adopted by the European Union with effective date of 01/01/2023.

• Amendments to IAS 12 "Income Taxes: Deferred Tax related to Assets and Liabilities arising from a Single Transaction" (effective for annual periods starting on or after 01/01/2023)

In May 2021, the IASB issued targeted amendments to IAS 12 to specify how companies should account for deferred tax on transactions such as leases and decommissioning obligations – transactions for which companies recognise both an asset and a liability. In specified circumstances, companies are exempt from recognising deferred tax when they recognise assets or liabilities for the first time. The amendments clarify that the exemption does not apply and that companies are required to recognise deferred tax on such transactions. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have been adopted by the European Union with effective date of 01/01/2023.

Amendments to IFRS 17 "Insurance contracts: Initial Application of IFRS 17 and IFRS 9 – Comparative Information" (effective for annual periods starting on or after 01/01/2023)

In December 2021, the IASB issued a narrow-scope amendment to the transition requirements in IFRS 17 to address an important issue related to temporary accounting mismatches between insurance contract liabilities and financial assets in the comparative information presented when applying IFRS 17 "Insurance Contracts" and IFRS 9 "Financial Instruments" for the first time. The amendment aims to improve the usefulness of comparative information for the users of the financial statements. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have been adopted by the European Union with effective date of 01/01/2023.

• Amendments to IAS 1 "Classification of Liabilities as Current or Non-current" (effective for annual periods starting on or after 01/01/2024)

In January 2020, the IASB issued amendments to IAS 1 that affect requirements for the presentation of liabilities. Specifically, they clarify one of the criteria for classifying a liability as non-current, the requirement for an entity to have the right to defer settlement of the liability for at least 12 months after the reporting period. The amendments include: (a) specifying that an entity's right to defer settlement must exist at the end of the reporting period; (b) clarifying that classification is unaffected by management's intentions or expectations about whether the entity will exercise its right to defer settlement; (c) clarifying how lending conditions affect classification; and (d) clarifying requirements for classifying liabilities an entity will or may settle by issuing its own equity instruments. Furthermore, in July 2020, the IASB issued an amendment to defer by one year the effective date of the initially issued amendment to IAS 1, in response to the Covid-19 pandemic. However, in October 2022, the IASB issued an additional amendment that aim to improve the information companies provide about long-term debt with covenants. IAS 1 requires a company to classify debt as non-current only if the company can avoid settling the debt in the 12 months after the reporting date. However, a company's ability to do so is often subject to complying with covenants. The amendments to IAS 1 specify that covenants to be complied with after the reporting date do not affect the classification of debt as current or non-current at the reporting date. Instead, the amendments require a company to disclose information about these covenants in the notes to the financial statements. The amendments are effective for annual reporting periods beginning on or after 1 January 2024, with early adoption permitted. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have not been adopted by the European Union.

• Amendments to IFRS 16 "Leases: Lease Liability in a Sale and Leaseback" (effective for annual periods starting on or after 01/01/2024)

In September 2022, the IASB issued narrow-scope amendments to IFRS 16 "Leases" which add to requirements explaining how a company accounts for a sale and leaseback after the date of the transaction. A sale and leaseback is a transaction for which a company sells an asset and leases that same asset back for a period of time from the new owner. IFRS 16 includes requirements on how to account for a sale and leaseback at the date the transaction takes place. However, IFRS 16 had not specified how to measure the transaction when reporting after that date. The issued amendments add to the sale and leaseback requirements in IFRS 16, thereby supporting the consistent application of the Accounting Standard. These amendments will not change the accounting for leases other than those arising in a sale and leaseback transaction. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have not been adopted by the European Union.

6. Turnover

Turnover for FYs 2022 and 2021 in the accompanying separate and consolidated financial statements is analyzed as follows:

	GRO	UP	COMPANY		
	01/01/- 31/12/2022	01/01/- 31/12/2021	01/01/- 31/12/2022	01/01/- 31/12/2021	
Sales of natural gas	3.797.377.266	1.494.057.315	3.669.037.325	1.405.875.811	
Sales in Bulgaria (gas supply license)	574.097.988	11.199.400	574.097.988	11.199.400	
Income from electricity	453.965.450	190.225.503	8.923.854	-	
Income from rendering services	860.097	1.354.695	-	-	
Gas transit fees & other					
network services	254.241	64.090	254.241	64.090	
Sales of material		2.815		2.815	
Total turnover	4.826.555.042	1.696.903.819	4.252.313.408	1.417.142.116	

The increase in turnover is due to the increase in gas prices.

7. Cost of Sales

Cost of sales for FYs 2022 and 2021 in the accompanying separate and consolidated financial statements is analyzed as follows:

	GR	GROUP			COMPANY		
	01/01/-	01/01/-		01/01/-		01/01/-	
	31/12/2022	31/12/2021		31/12/2022		31/12/2021	
Cost of sales of inventories	(4.407.108.834)	(1.284.534.214)		(4.010.440.403)		(1.136.283.795)	
Staff costs	(341.906)	(590.113)		(18.898)		(267.064)	
Third party fees	(135.084.965)	(25.353.907)		(134.513.738)		(24.389.982)	
Utilities	(101.313.874)	(97.531.866)		(1.222.854)		(815.421)	
Taxes and duties	(1.463.617)	(1.559.080)		(797.941)		(864.735)	
Other expenses	(1.594.214)	(946.240)		(1.594.214)		(946.240)	
Depreciation and amortization	(3.443.685)	(3.519.451)		(1.020.464)		(1.095.799)	
Provisions	1.439	(2.739)		1.439		(2.739)	
Consumables - losses	(137.619)	(140.077)		(137.619)		(140.077)	
Total cost of sales	(4.650.487.276)	(1.414.177.687)		(4.149.744.693)		(1.164.805.853)	

8. Administrative expenses

Administrative expenses for FYs 2022 and 2021 in the accompanying separate and consolidated financial statements are analyzed as follows:

	GF	OUP	COMPANY		
	01/01/- 31/12/2022	01/01/- 31/12/2021	01/01/- 31/12/2022	01/01/- 31/12/2021	
Staff costs	(6.443.240)	(5.758.883)	(4.090.142)	(3.565.334)	
Third party fees	(9.163.482)	(7.038.708)	(7.284.338)	(5.657.567)	
Utilities	(2.733.726)	(2.428.682)	(1.772.540)	(1.584.535)	
Taxes and duties	(295.331)	(185.287)	(187.916)	(85.469)	
Other expenses	(1.404.128)	(1.331.373)	(928.823)	(1.001.185)	
Provisions	(17.285)	(42.782)	(17.285)	(21.548)	
Depreciation and amortization	(1.915.923)	(1.676.769)	(769.780)	(749.852)	
Consumables - losses	-	-		-	
Total administrative expenses	(21.973.114)	(18.462.483)	(15.050.825)	(12.665.490)	

9. Distribution expenses

Distribution expenses for FYs 2022 and 2021 in the accompanying separate and consolidated financial statements are analyzed as follows:

		GROUP	COMPANY		
	01/01/- 01/01/- 31/12/2022 31/12/2021		01/01/- 31/12/2022	01/01/- 31/12/2021	
Staff costs	(1.690.599)	(1.826.825)	(48.799)	(249.218)	
Third party fees	(11.385.045)	(9.252.979)	(3.079.533)	(2.279.373)	
Utilities	(1.166.926)	(1.204.197)	(394.412)	(330.937)	
Taxes and duties	(64.783)	(18.856)	(64.783)	(18.856)	
Other expenses	(11.978.890)	(6.768.241)	(7.984.802)	(3.874.060)	
Provisions	2.354	(2.834)	2.354	(2.834)	
Depreciation and amortization	(583.531)	(486.214)	(225.174)	(161.833)	
Consumables - losses	(8.451.958)	(1.798.837)	(8.451.958)	(1.798.837)	
Total distribution expenses	(35.319.380)	(21.358.982)	(20.247.107)	(8.715.949)	

10. Other (expenses) / income

Other revenue and expenses for FYs 2022 and 2021 in the accompanying separate and consolidated financial statements are analyzed as follows:

	GROUP		COMPA	COMPANY		
	01/01/-31/12/2022	01/01/- 31/12/2021	01/01/-31/12/2022	01/01/- 31/12/2021		
Other income						
Income from grants (of no fixed						
assets)	189.111	749.152	145.329	633.584		
Income from similar activities	1.249.680	933.468	503.555	426.029		
Revenue from retrospective						
adjustment of gas charges	-	90.074.165	-	83.236.209		
Other income	3.925.588	5.888.587	3.645.483	5.699.365		
Income from used provisions for						
receivables	4.500.000	-	4.500.000	-		
Income from unused provisions						
for receivables		4.748.482		3.291.269		

Total other income

	GROUP		СОМРАМ	COMPANY		
	01/01/-31/12/2022	01/01/- 31/12/2021	01/01/-31/12/2022	01/01/- 31/12/2021		
Other expenses						
Other operating expenses Write off tax receivables from the	(4.805.189)	(8.457.383)	(4.353.497)	(8.399.320)		
Greek State	(39.084.693)	-	(39.084.693)	-		
Provision for credit loss	(20.696.097)	(5.525.424)	(10.510.284)	(704.586)		
Write-off clients balances	(363.321)	(38.060)	-	-		
Total other expenses	(64.949.301)	(14.020.867)	(53.948.474)	(9.103.906)		
Other income/(expenses)	(55.084.922)	88.372.987	(45.154.107)	84.182.549		

102.393.855

8.794.367

93.286.456

9.864.379

The account Tax receivables from the Greek State" included receivables of €39.1 million arising from withhold tax on dividends for the period 2008-2012. Under the provisions of article 54, Law 2238/1994, DEPA could offset in the future, but since no relevant provision for offsetting the above tax in the subsequent tax law (articles 48 and 63 of Law 4172/2013) was effective, DEPA submitted its tax returns with reservation. Moreover, DEPA made four tax appeals to the Athens Administrative Court of Appeal, regarding a component of the total amount, i.e. the amounts of € 268,148.77, € 884,172.61, € 5,030,968.31 and \notin 16,730,120.36, respectively. Two appeals were accepted and the amount in dispute was returned to DEPA, while the Court rejected the other two appeals. The losing party made appeals to the Council of State against four decisions of the Athens Administrative Court of Appeal. Regarding the appeals of the Greek State pertaining to the first two appeals (which were accepted by the first instance court), in 2022, the Council of State issued two decisions (disclosed to DEPA approximately at the end of June 2023), which annulled the prior decisions of the Athens Administrative Court of Appeal of Athens. The Council of State heard the cases and rejected DEPA's appeals. Regarding DEPA's appeals, in 2022 the Council of State also issued a decision (disclosed to DEPA at the end of June 2023), rejecting one of DEPA's two appeals. However, the decision on the second DEPA's appeal is still pending. Therefore, the aforementioned receivables were written off in the Financial Statements as of 31.12.2022.

11.Profit/(Loss) from foreign currency differences

Profit/(Loss) from foreign currency differences of the Group and the Company for FYs 2022 and 2021 in the accompanying separate and consolidated financial statements are analyzed as follows:

	GR	OUP	COMP	ANY	
	01/01/- 31/12/2022	01/01/- 31/12/2021	01/01/- 31/12/2022	01/01/- 31/12/2021	
Loss from foreign exchange differences	(14.920.425)	(6.152.625)	(14.920.425)	(6.152.625)	
Gain from foreign exchange differences	21.117.462	7.571.673	21.117.462	7.571.673	
Profit/(loss) from foreign exchange differences	6.197.037	1.419.048	6.197.037	1.419.048	

12. Financial expenses and income

Financial income and expenses for FYs 2022 and 2021 in the accompanying separate and consolidated financial statements are analyzed as follows:

Financial expenses

	GRC	OUP	COMPANY		
	01/01/- 31/12/2022	01/01/- 31/12/2021	01/01/- 31/12/2021		
Interest on short-term loans	(1.459.752)	(17.000)	(317.747)	-	
Expenses for letters of guarantee	(7.678.698)	(1.220.516)	(7.678.698)	(1.059.269)	
Other bank expenses	(1.599.725)	(729.973)	(575.551)	(295.020)	
Lease interest expenses	(59.628)	(84.780)	(21.939)	(29.266)	
Other financial expenses	(20.310)	-	(20.324)	(138)	
Total finance cost	(10.818.113)	(2.052.269)	(8.614.259)	(1.383.694)	

Financial income

	GRC	DUP	COMPANY		
	01/01/- 31/12/2022	01/01/- 31/12/2021	01/01/- 31/12/2022	01/01/- 31/12/2021	
Deposit interests	75.956	97.144	75.244	87.733	
Interests from overdue receivables	13.617.332	9.831.188	11.585.165	9.283.453	
Other Financial income	2	2	2	2	
Total financial income	13.693.290	9.928.335	11.660.411	9.371.189	

13. Profit/(Loss) from jointly controlled entities

The following table presents profit or loss for FY 2022 and 2021 from jointly controlled entities consolidated under equity method:

	GROUP				
	01/01/- 31/12/2022		01/01/- 31/12/2021		
Loss from associates & jointly controlled entities	-		(372.829)		
Profit from associates & jointly controlled entities	3.047.348				
Total	3.047.348	-	(372.829)		

14. Income Tax

Tax burdening recorded in the Group and the Company income statement is presented below as follows:

	GF	ROUP	COMP	ANY
	01/01/- 31/12/2022	01/01/- 31/12/2021	01/01/- 31/12/2022	01/01/- 31/12/2021
Current income tax	(30.445.295)	(56.493.985)	(16.390.175)	(53.224.652)
Prior year taxes	92.389	470.449	163.109	30.944
Deferred tax	3.955.125	(21.567.657)	344.506	(21.495.216)
Total income tax in the Income Statement	(26.397.782)	(77.591.193)	(15.882.560)	(74.688.925)

The actual tax rate for 2022 is approximately 34.75% for the Group and 43.01% for the Company. Under the introduction of Law 4799 / 2021 which amended par. 1, Article 58, Law 4172/2013, the tax rate for the income of legal entities in Greece from 2021 onwards is reduced by 2% and is now set at 22%.

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	GROUP			COMPANY				
	%	01/01/- 31/12/2022	%	01/01/- 31/12/2021	%	01/01/- 31/12/2022	%	01/01/- 31/12/2021
Earning before tax		75.965.869		340.353.374		36.929.649		334.956.190
Tax calculated applying the Company's tax rate (2022: 22%, 2021: 22%)	-22,00%	(16.712.491)	-22,00%	(74.877.742)	-22,00%	(8.124.523)	-22,00%	(73.690.362)
Non-deductible expenses from taxable income	-11,97%	(9.091.743)	-0,03%	(88.532)	-24,56%	(9.068.133)	-0,02%	(76.694)
Tax-exempted income	-	-	-	-	3,23%	1.191.042	0,67%	2.256.944
Prior year taxes	0,12%	92.389	0,14%	470.449	0,44%	163.109	0,01%	30.944
Rate difference	0,00%	-	-0,73%	(2.472.308)	-	-	-0,86%	(2.892.058)
Profit /(Loss) from associates & jointly controlled entities	0,88%	670.416	-0,02%	(82.022)	-	-	-	-
Other Changes	0,05%	41.654	0,09%	319.330	-0,12%	(44.055)	0,00%	(46)
Other changes	0,00%	-	-0,09%	(317.652)	0,00%	-	-0,09%	(317.652)
Effect of net temporary tax differences for which deferred tax is not recognized	-1,84%	(1.398.007)	-0,16%	(542.714)	-	-	-	-
Total tax in the Income Statement	-34,75%	(26.397.782)	-22,80%	(77.591.191)	-43,01%	(15.882.560)	-22,30%	(74.688.924)

15. Depreciation/Amortization

Depreciation/Amortization of tangible and intangible assets, burdening the income statement of the Group and the Company, is presented below as follows:

	GR	OUP	СОМ	PANY
	01/01/- 31/12/2022	01/01/- 31/12/2021	01/01/- 31/12/2022	01/01/- 31/12/2021
Cost of sales	(3.443.685)	(3.519.451)	(1.020.464)	(1.095.799)
Administrative expenses	(1.915.923)	(1.676.769)	(769.780)	(749.852)
Distribution expenses	(583.531)	(486.214)	(225.174)	(161.833)
Total depreciation Less: Amortization of grants for property, plant and	(5.943.139)	(5.682.433)	(2.015.418)	(2.007.485)
equipment	155.957	153.438	155.957	153.438
Net burdening of depreciation and amortization	(5.787.182)	(5.528.995)	(1.859.461)	(1.854.047)

16. Goodwill

The remaining goodwill on December 31, 2022 concerns the Natural Gas – Hellenic Energy Company acquired in 2018 and is included in the consolidated financial statements in accordance with the policy referred to in Note 3.4. On December 31, 2022, the relevant goodwill was tested for impairment using the value-in-use method. Regarding the aforementioned calculation, projections for cash flows were used based on the business plan of the Natural Gas Company – Hellenic Energy Company. After the first years of the business plan, cash flows arose following the implementation of an estimated growth rate of 1.7% that reflects the Natural Gas Company – Hellenic Energy Company Management's projections. Its Management determines the annual growth rate of sales volume and gross profit margins based on past returns and market growth expectations. The discount rate used stood at 8.81%, thus reflecting the specific risks of the company. The results of this method show that the estimate exceeds the goodwill amounting to \notin 14,635,563 on December 31, 2022.

A sensitivity analysis was performed for the key assumptions of the model (discounted interest rates and growth rate in perpetuity) in order to examine the adequacy of the value margin and it was estimated that on December 31, 2022 if the growth rate of future free cash flows of the Natural Gas - Hellenic Energy Company used in the impairment study was lower by 0.5%, with all other variables kept constant, the value of the company would be lower by 5.4%. In addition, if the future discount rate was higher by 0.5%, with all other variables kept constant, the value of the sensitivity analysis was that the recoverable amount by far exceeds the carrying amount.

17. Property, plant and equipment

Property, plant and equipment of the Group and the Company for the periods January 1st – December 31st 2022 and 2021 in the accompanying financial statements are analyzed as follows:

				GROUP			
	Land	Buildings and building installations	Machinery	Vehicles	Furniture and fixtures	Assets under construction	Total
Acquisition value							
As at 01/01/2021	260.185	5.645.169	17.601.440	99.808	2.604.294	376.713	26.587.609
Additions for the Period	-	297.892	179.827	-	273.823	1.396.754	2.148.296
Disposals/Write-offs/Decreases	-	-	-	-	(48.553)	-	(48.553)
Transfers	-	-	566.074	-		(566.074)	-
Total as at 31/12/2021	260.185	5.943.061	18.347.341	99.808	2.829.564	1.207.393	28.687.352
Accumulated depreciation							
As at 01/01/2021	-	4.484.025	7.496.031	95.218	1.940.260	-	14.015.535
Additions Period	-	291.771	675.578	1.821	304.941	-	1.274.111
Write-offs	-	-	-	-	(47.649)	-	(47.649)
Total as at 31/12/2021	-	4.775.796	8.171.608	97.039	2.197.552	-	15.241.997
Net book value							
Total as at 01/01/2021	260.185	1.161.144	10.105.409	4.589	664.035	376.713	12.572.076
Total as at 31/12/2021	260.185	1.167.265	10.175.733	2.768	632.012	1.207.393	13.445.357

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				GROUP			
	Land	Buildings and building installations	Machinery	Vehicles	Furniture and fixtures	Assets under construction	Total
Acquisition value							
As at 01/01/2022	260.185	5.943.061	18.347.341	99.808	2.829.564	1.207.393	28.687.352
Additions for the Period	760.000	89.027	1.349.349	6.690	130.902	3.233.827	5.569.795
Disposals/Write-offs/Decreases	-	-	(343.712)	(4.247)	(41.721)	-	(389.680)
Transfers		-	3.491.096	-	74.046	(3.565.142)	-
Total as at 31/12/2022	1.020.185	6.032.088	22.844.073	102.251	2.992.792	876.079	33.867.468
Accumulated depreciation							
As at 01/01/2022	-	4.775.796	8.171.608	97.039	2.197.552	-	15.241.997
Additions for the Period	-	370.800	757.705	1.218	251.547	-	1.381.270
Disposals/Write-offs/Decreases	-	-	(65.021)	(4.247)	(27.785)	-	(97.053)
Total as at 31/12/2022	-	5.146.596	8.864.293	94.010	2.421.314	-	16.526.213
Net book value							
Total as at 01/01/2022	260.185	1.167.265	10.175.733	2.768	632.012	1.207.393	13.445.357
Total as at 31/12/2022	1.020.185	855.492	13.979.781	8.240	571.478	876.079	17.341.256

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				COMPANY			
	Land	Buildings and building installations	Machinery	Vehicles	Furniture and fixtures	Assets under construction	Total
Acquisition value							
As at 01/01/2021	260.185	4.912.631	17.601.440	99.808	1.561.402	286.213	24.721.679
Additions for the Period	-	284.552	179.827	-	245.979	1.396.754	2.107.112
Disposals/Write-offs/Decreases	-	-	-	-	(19.849)	-	(19.849)
Transfers	-	-	566.074	-	-	(566.074)	-
Total as at 31/12/2021	260.185	5.197.183	18.347.341	99.808	1.787.532	1.116.893	26.808.942
Accumulated depreciation							
As at 01/01/2021	-	4.253.476	7.496.031	95.218	1.418.581	-	13.263.306
Additions for the Period	-	204.923	675.578	1.821	188.912	-	1.071.234
Disposals/Write-offs/Decreases	-	-	-	-	(19.849)	-	(19.849)
Total as at 31/12/2021		4.458.399	8.171.608	97.039	1.587.644	-	14.314.691
Net book value							
As at 01/01/2021	260.185	659.155	10.105.409	4.589	142.821	286.213	11.458.375
As at 31/12/2021	260.185	738.785	10.175.733	2.768	199.887	1.116.893	12.494.252

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	COMPANY								
	Land	Buildings and building installations	Machinery	Vehicles	Furniture and fixtures	Assets under construction	Total		
Acquisition value	L								
As at 01/01/2022	260.185	5.197.183	18.347.341	99.808	1.787.532	1.116.893	26.808.942		
Additions for the Period	760.000	89.027	1.349.349	6.690	107.330	3.163.990	5.476.386		
Disposals/Write-offs/Decreases	-	-	(343.712)	(4.247)	(40.185)	-	(388.144)		
Transfers		-	3.491.096	-	-	(3.491.096)	-		
Total as at 31/12/2022	1.020.185	5.286.210	22.844.073	102.251	1.854.677	789.788	31.897.186		
Accumulative depreciation As at 01/01/2022									
	-	4.458.399	8.171.608	97.039	1.587.644	-	14.314.691		
Additions for the Period	-	283.687	757.705	1.218	144.893	-	1.187.503		
Disposals/Write-offs/Decreases Total as at 31/12/2022		-	(65.021)	(4.247)	(27.017)	-	(96.285)		
101a1 as al 31/12/2022	-	4.742.086	8.864.293	94.010	1.705.520	-	15.405.909		
Net book value									
Total as at 01/01/2022	260.185	738.785	10.175.733	2.768	199.887	1.116.893	12.494.252		
Total as at 31/12/2022	1.020.185	544.124	13.979.781	8.240	149.157	789.788	16.491.276		

18. Investment property

Investment property of the Group and the Company is analyzed as follows:

Additions - - Additions - 1.262.897 1.262 Write-offs/decreases - - - Write-offs/decreases - - Total as at 31/12/2022 361.173 6.063.940 6.425.113 Total as at 31/12/2021 361.173 6.063.940 6.425 Accumulative depreciation - - - - - - Additions - 161.338 161.338 161.338 - - - Write-offs/decreases - - - - - - - - Net book value Net book value Net book value - - - - - -		Land	Buildings & building installations	Total		Land	Buildings & building installations	Total
Additions Additions . 1.262.897 1.262 Write-offs/decreases .								
Write-offs/decreases .		361.173	6.063.940	6.425.113		361.173	4.801.043	5.162.216
Total as at 31/12/2022 361.173 6.063.940 6.425.113 Total as at 31/12/2021 361.173 6.063.940 6.425 Accumulative depreciation Accumulative depreciation Accumulative depreciation As at 01/01/2021 - 2.794.424 2.794 Additions - 161.338 161.338 Additions - 176.626 176 Write-offs/decreases - - Write-offs/decreases - - - Net book value	Additions	-	-	-	Additions	-	1.262.897	1.262.897
Accumulative depreciation Accumulative depreciation As at 01/01/2022 - 2.971.050 2.971.050 As at 01/01/2021 - 2.794.424 2.794 Additions - 161.338 161.338 Additions - 176.626 176 Write-offs/decreases - - - Write-offs/decreases - - Total as at 31/12/2022 - 3.132.388 3.132.388 Total as at 31/12/2021 - 2.971.050 2.974 Net book value	Write-offs/decreases		-	_	Write-offs/decreases	-	-	
As at 01/01/2022 - 2.971.050 2.971.050 As at 01/01/2021 - 2.794.424 2.794 Additions - 161.338 161.338 Additions - 176.626 176 Write-offs/decreases - - - Write-offs/decreases - - Total as at 31/12/2022 - 3.132.388 3.132.388 Total as at 31/12/2021 - 2.971.050 2.971 Net book value	Total as at 31/12/2022	361.173	6.063.940	6.425.113	Total as at 31/12/2021	361.173	6.063.940	6.425.113
Net book value	As at 01/01/2022 Additions Write-offs/decreases		161.338	161.338	As at 01/01/2021 Additions Write-offs/decreases	-	176.626 -	2.794.424 176.626
	Total as at 31/12/2022	-	3.132.388	3.132.388	Total as at 31/12/2021	-	2.971.050	2.971.050
As at 01/01/2022 361.173 3.092.890 3.454.063 As at 01/01/2021 361.173 2.006.619 2.367	<u>Net book value</u> As at 01/01/2022	361 173	3 092 890	3 454 063	<u>Net book value</u> As at 01/01/2021	361 173	2 006 619	2.367.791
					—			3.454.063

19. Intangible assets

Intangible assets of the Group and the Company and their movement, for the periods January 1st – December 31st 2022 and 2021 are analyzed as follows:

			GROU	b					COMPANY	
	Software	Network Right- of-use	Software under construction	Trademark	Clientele	Total	So	ftware	Network Rights-of- use	Total
Acquisition value										
As at 01/01/2021	4.204.277	4.622.371	464.685	14.200.000	31.100.000	54.591.333		1.086.745	4.622.371	5.709.116
Additions	603.257	-	372.484	-	-	975.742		36.478	-	36.478
Software Development Cost Capitalization	209.379	-	-	-	-	209.379		-	-	-
Transfers (from) / to	103.206	-	(103.206)	-	-	-		-	-	-
Total as at 31/12/2021	5.120.119	4.622.371	733.963	14.200.000	31.100.000	55.776.453		1.123.222	4.622.371	5.745.593
Accumulative amortization										
As at 01/01/2021	2.233.712	2.890.159	-	-	4.983.973	10.107.844		1.046.159	2.890.159	3.936.317
Additions	698.804	192.466	-	-	2.392.308	3.283.578		23.017	192.466	215.483
Total as at 31/12/2021	2.932.516	3.082.625	-	-	7.376.281	13.391.422		1.069.175	3.082.625	4.151.800
<u>Net book value</u>										
As at 01/01/2021	1.970.565	1.732.212	464.685	14.200.000	26.116.027	44.483.486		40.586	1.732.212	1.772.798
As at 31/12/2021	2.187.602	1.539.746	733.963	14.200.000	23.723.719	42.385.029		54.047	1.539.746	1.593.792

		GROUP							COMPANY	
	Software	Network Right- of-use	Software under construction	Trademark	Clientele	Total		Software	Network Rights- of-use	Total
Acquisition value										
As at 01/01/2022	5.120.119	4.622.371	733.963	14.200.000	31.100.000	55.776.453		1.123.222	4.622.371	5.745.593
Additions	944.334	1.043.829	-	-	-	1.988.163		200.203	-	200.203
Acquisition of subsidiaries	-	58.267.568	-	-	-	58.267.568				
Software Development Cost										
Capitalization	197.247	-	-	-	-	197.247		-	-	-
Transfers (from) / to	725.963	-	(725.963)	-	-	-		-	-	-
Disposals/Write-offs	-	(4.622.371)	-	-		(4.622.371)			(4.622.371)	(4.622.371)
Total as at 31/12/2022	6.987.663	59.311.397	8.000	14.200.000	31.100.000	111.607.060		1.323.425	0	1.323.425
Accumulative amortization										
As at 01/01/2022	2.932.516	3.082.639	-	-	7.376.281	13.391.422		1.069.175	3.082.639	4.151.800
Additions	981.383	96.233	-	-	2.392.308	3.469.924		58.309	96.233	154.542
Disposals/Write-offs	-	(3.178.872)	-	-	-	(3.178.872)		-	(3.178.872)	(3.178.872)
Total as at 31/12/2022	3.913.899	-	-	-	9.768.589	13.682.474		1.127.484	-	1.127.470
<u>Book value</u>										
Total as at 01/01/2022	2.187.602	1.539.732	733.963	14.200.000	23.723.719	42.385.029		54.047	1.539.732	1.593.793
Total as at 31/12/2022	3.073.764	59.311.397	8.000	14.200.000	21.331.411	97.924.585		195.941	-	195.955

The trademark concerns "Natural Gas Attikis" with indefinite useful life. The trademark was tested for impairment applying the relief-from-royalty method. According to this method, the value of the intangible asset is estimated as the present value of "relief-from royalty savings". For the purposes of this calculation, projections for turnover were used based on the business plan of EPA Attikis. The discount rate used was 8.81%, reflecting the specific risks of the company. The "royalty rate" was set at 1.02%. The results of this method show that the estimate significantly exceeds the recognized value of the trademark, amounting to \leq 14,200,000 on December 31, 2022.

A sensitivity analysis was performed for the key assumptions of the model (discounted interest rates and growth rate in perpetuity) in order to examine the adequacy of the value margin and it was estimated that on December 31, 2022 if the growth rate of future free cash flows of the Natural Gas - Hellenic Energy Company used in the impairment study was lower by 0.5%, with all other variables kept constant, the value of the brand name would be lower by 5.0%. In addition, if the future discount rate was higher by 0.5%, with all other variables kept constant, the value of the brand name would be lower by 4.7%. The result of the sensitivity analysis was that the recoverable amount by far exceeds the carrying amount.

20. Right-of-use assets

Right-of-use assets of the Group and the Company and their movement, for the periods January 1st to December 31st 2022 and 2021 in the accompanying financial statements are analyzed as follows:

	GROUP						СОМРА	NY	
	Land	Buildings & building installations	Vehicles	Total		Land	Buildings & building installations	Vehicles	Total
Acquisition value									
Balance as at 01/01/2021	21.706	2.869.698	1.064.460	3.955.864		21.706	881.125	397.523	1.300.355
Additions	27.590	892.029	87.991	1.007.610		27.590	872.734	86.207	986.531
Other adjustments		-	(5.297)	(5.297)		-	-	(5.297)	(5.297)
Total as at 31/12/2021	49.297	3.761.727	1.147.153	4.958.177		49.297	1.753.859	478.433	2.281.589
Accumulative amortization									
Balance as at 01/01/2021	21.706	1.396.159	411.916	1.829.782		21.706	881.125	139.281	1.042.113
Additions	11.623	695.827	240.668	948.118		11.623	436.367	96.152	544.142
Total as at 31/12/2021	33.330	2.091.986	652.584	2.777.900		33.330	1.317.492	235.433	1.586.255
Net book value									
As at 01/01/2021	-	1.473.539	652.543	2.126.082			-	258.242	258.242
Total as at 31/12/2021	15.967	1.669.741	494.569	2.180.277		15.967	436.367	243.000	695.334

		GROU	JP			СОМРА	NY	
	Land	Buildings & building installations	Vehicles	Total	Land	Buildings & building installations	Vehicles	Total
Acquisition value								
As at 01/01/2022	49.297	3.761.727	1.147.153	4.958.177	49.297	1.753.859	478.433	2.281.589
Additions	6.866	36.295	184.322	227.483	6.866	-	111.034	117.900
Other adjustments		(26.699)	(42.573)	(69.272)		(26.699)	(42.573)	(69.272)
Total as at 31/12/2022	56.162	3.771.323	1.288.902	5.116.388	56.162	1.727.160	546.894	2.330.217
Accumulative amortization								
As at 01/01/2022	33.330	2.091.986	652.584	2.777.900	33.330	1.317.492	235.433	1.586.255
Additions	17.496	677.062	236.054	930.612	17.496	406.387	88.151	512.035
Total as at 31/12/2022	50.826	2.769.048	888.638	3.708.512	50.826	1.723.880	323.584	2.098.290
Net book value								
As at 01/01/2022	15.967	1.669.741	494.569	2.180.277	15.967	436.367	243.000	695.334
Total as at 31/12/2022	5.336	1.002.275	400.264	1.407.876	5.336	3.280	223.310	231.927

In 2022, amortizations of right-of-use assets of the Group have been recorded in the Cost of sales at Euro 64,107 (Euro 68,101 in 2021) in the Administrative Expenses Euro 577,903, (Euro 593,727 in 2021) and in the Distribution expenses Euro 288,602 (Euro 283.809 in 2021).

21. Group Structure

The following table presents the total direct and indirect participating interest of DEPA COMMERCIAL S.A. in entities, included in the consolidation in full or incorporated under equity method.

COMPANY	LOCATION	PRINCIPAL ACTIVITY	CONSOLIDATION METHOD	PARTICIPATION RELATIONSHIP	% PARTICIPATION 31.12.2022	% PARTICIPATION 31.12.2021
DEPA COMMERCIAL S.A.	Athens	Import, distribution and sale of natural gas	Full consolidation	-	Parent	Parent
I. Subsidiaries						
Natural Gas- Greek Energy Company	Athens	Sale of natural gas & electricity	Full consolidation	Direct	100,00%	100,00%
NORTH SOLAR SA	Athens	Construction, installation, operation, management and in general operation of power generating units, i.e. wind, hydroelectric, photovoltaic and all kinds of energy projects	Full consolidation	Direct	100,00%	-
NORTH SOLAR 1 SA		Construction, installation, operation, management and in general operation of power generating units, i.e. wind, hydroelectric, photovoltaic and all kinds of energy projects	Full consolidation	Direct	100,00%	-
NEW SPES CONCEPT Single Member S.A.		Development of electricity production projects from solar energy through photovoltaics (PV).	Full consolidation	Direct	100,00%	-
II. Jointly contro	olled entities					
GASTRADE S.A.	Athens	Collection, storage, gasification as well as transportation of liquefied natural gas	Equity	Direct	20,00%	20,00%
NORTH SOLAR A.E	Athens	Construction, installation, operation, management and in general operation of power generating units, i.e. wind, hydroelectric, photovoltaic and all kinds of energy projects	Equity	Direct	-	49,00%
ALEXANDROU POLIS POWER PLANT S.A.	Athens	Development projects for production of electricity from natural gas	Equity	Direct	29%	-

21.1. Changes in the Group structure in 2022

The following changes took place in the Group structure in 2022 in relation to the comparative year 2021:

On 07.04.2022 the Board of Directors of DEPA Commercial S.A. decided to acquire 100% of the shares of the company under the title "NEW SPES CONCEPT SA". The Company develops projects for production of electricity from solar energy through photovoltaics (PV) in the wider area of Kozani, Larissa and Fokida.

On 12.08.2022, in the context of the implementation of the Business Plan 2020-2024 and 2021-2025, the Board of Directors of DEPA decided to acquire 100% of the company under the title "NORTH SOLAR 1 S.A.". The Company develops projects for production of electricity from solar energy through photovoltaics (PV).

On 05.10.2022 in the context of the implementation of the Business Plan 2020-2024 and 2021-2025, the Board of Directors of DEPA Commercial S.A. decided to acquire the remaining 51% of the share capital of the Company "North Solar S.A."

On 15.11.2022 the Board of Directors of DEPA Commercial S.A. decided to acquire 29% of the share capital of the company "Alexandroupolis Power Plant S.A.". The Company develops projects for production of electricity from natural gas. On 20.12.2022 the acquisition by DEPA of the percentage of 29% was completed. The company is planning the construction and operation of a modern Combined Cycle Unit fueled by natural gas, of capacity 840 MW in the area of Alexandroupolis. The remaining shareholders of the company are PPC at 51% and Damco Energy at 20%. The power plant will be directly connected to Gastrade's FSRU ("Floating Storage and Gasification Unit"), which is currently under construction. The equipment that will be installed in the plant is suitable for hydrogen combustion and can operate with mixed fuel.

22.Investments

22.1 Investments in subsidiaries

The carrying amount of investments in subsidiaries is analyzed as follows:

	COMPA	ANY .
	31/12/2022	31/12/2021
Natural Gas-Greek Energy Company	48.254.133	48.254.133
North Solar S.A.	33.563.525	-
North Solar 1 S.A.	10.252.008	-
New Spes Concept S.A.	15.742.385	
Total	107.812.050	48.254.133

22.1.1 Business Acquisition

Assets acquired and liabilities undertaken regarding the companies acquired in 2022 (see Note 22.1) do not constitute a "business" according to the definition of IFRS 3 and consequently do not fall within the scope of this Standard. However, the particular transactions were accounted for as acquisition of assets. The accounting policy applied for the recognition of the transaction is described in Note 3.2 to the accompanying Annual Consolidated and Separate Financial Statements as of 31/12/2022.

Their acquisition cost was allocated to the separate identifiable assets and liabilities, based on their relative fair values, on the acquisition date, while no goodwill arises from such kind of transactions.

The data, related to the acquisition of the companies, is presented below as follows:

	Fair values at the date of acquisition of control				
	NEW SPES	NEW SPES NORTH SOLAR 1			
ASSETS					
Intangible assets	15.546.999	9.561.596	33.569.028		
Trade and other receivables	29.149	53	6.072		
Cash and cash equivalents	1.127	24.999	3.466		
Total assets	15.577.275	9.586.648	33.578.566		
LIABILITIES					
Suppliers and other payables	34.890	240	15.041		
Total liabilities	34.890	240	15.041		
Net assets acquired	15.542.385	9.586.408	33.563.525		

As a result of the aforementioned acquisitions, the Group recognized intangible assets (PV licenses) amounting to \in 15,547 k for NEW SPES CONCEPT S.A., \in 9,562 K FOR NORTH SOLAR 1 S.A. and \in 33,569 k for NORTH SOLAR S.A. The fair value of intangible assets was based on an independent appraiser's report.

22.2 Investments in joint venture and associates

Investments in joint ventures are analyzed below as follows:

	GRO	UP	COM	IPANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
GASTRADE	16.265.780	13.223.839	13.700.582	13.700.582
ALEXANDROUPOLIS POWER PLANT S.A.	1.840.041	-	1.840.041	-
NORTH SOLAR		19.334.652		19.340.058
Current value/Acquisition value of investments in joint ventures	18.105.821	32.558.490	15.540.623	33.040.640

Changes in the carrying amount of joint ventures in the current and previous FYs are as follows:

]	GROUP		COMPANY		
	31/12/2022	31/12/2021	31/12/2022	31/12/2021	
Opening balance	32.558.490	5.921.279	33.040.640	6.024.000	
Acquisition	1.840.041	27.016.640	1.840.041	27.016.640	
Profit/(loss) from investment in joint venture and associates	3.047.348	(372.829)	-	-	
Change from joint venture to subsidiary	(19.340.058)	-	(19.340.058)	-	
Share capital increase costs	-	(6.600)	-	-	
Closing balance	<u>18.105.821</u>	32.558.490	15.540.624	33.040.640	

Condensed financial information regarding joint ventures in FY 2022 and FY 2021 is presented below as follows:

	North solar	North solar	Gastrad	le
	2022	2021	2022	2021
Fixed Assets	-	3.110	146.526.432	1.577.835
Cash and cash equivalents	-	24.739	8.445.842	634.354
Other Current Assets	-	3.257	15.591.622	1.766.596
Other Long-term liabilities	-	(17.139)	(149.243.041)	(710.027)
Other Short-term liabilities	-		(4.129.444)	(1.287.055)
Total Equity	-	13.967	17.191.412	1.981.704
Group's Share in Equity	-	6.844	3.438.282	396.341
Acquisition value of jointly controlled entities	-	19.334.652	16.265.780	13.223.839

Sales	-	-	-	-
Depreciation/Amortization	-	-	(115.801)	(38.100)
Financial income	-	-	-	15
Financial expenses	-	(83)	(745.892)	(28.771)
Income tax	-	3.110	3.482.958	2.651
Net earnings & other comprehensive	-			
income (100%)		(11.033)	15.209.707	(1.780.094)
Group's Share in net earnings & other	-			
comprehensive income (49% & 20%)		(5.406)	3.041.941	(356.019)
Other adjustments	-	-	-	(11.404)
Total	-	(5.406)	3.041.941	(367.423)

Regarding the Company, income from dividends from investments in subsidiaries and jointly controlled entities is included in the item "Investment Income" in the statement of comprehensive income of the Company.

In 2022, the Company received dividends of EURO 5,413,828 (2021 EURO 10,258,836) from the subsidiary ""Natural Gas-Hellenic Energy Company".

22.3 Investments in Securities

Investments in Securities are presented as follows:

	GROUP		CC	OMPANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
ENERGY COMPETENCE CENTER PRIVATE				
EQUITY COMPANY	143.000		143.000	
Current value/Acquisition value of investments in joint ventures	143.000		143.000	

On December 20, 2021, the private equity company under the title "ENERGY COMPETENCE CENTER PRIVATE EQUITY COMPANY" was established. DEPA participating interest in the aforementioned company equals 10% of its capital. (On 04/03/2022 DEPA paid its participation rate of \in 143,000). The company aims to promote innovation in domestic entrepreneurship, share facilities and equipment, exchange knowledge and expertise, create networks and implement research projects.

Gains from future measurements at fair value will be included in Other comprehensive income in the Statement of Comprehensive Income and will not be reclassified to the Income Statement in subsequent periods.

23. Deferred tax

In some cases revenues and expenses are recognized at a different time than when these revenues and expenses become eligible to be recognized as taxable income by the tax authorities. In these cases, recognition of deferred tax asset or liability is required.

	GROUP		СОМ	PANY
	31/12/2022	21/12/2021	31/12/2022	21/12/2021
Deferred tax Liabilities	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Tax exempted reserves	(108.724)	(108.724)	(108.724)	(108.724)
Currency translation differences	-	(300.029)	-	(300.029)
Provision for bad receivables	-		-	
Assets Grants	(8.503)	(9.368)	(8.503)	(9.368)
Leasing right-of-use	(152.974)	(152.974)	(152.974)	(152.974)
Reputation & Clientele	(7.816.910)	(8.343.218)	-	-
Risk hedging derivatives	-	-	-	-
Other Adjustments	(1.046.903)	(1.177.955)	-	
	(9.134.015)	(10.092.268)	(270.201)	(571.095)
Deferred tax assets				
Depreciation/Amortization	60.269	117.121	53.627	111.065
Provision for bad debts	13.908.970	11.827.762	12.716.085	11.396.572
Provision for obsolescence of inventory	183.371	183.371	183.371	183.371
Provision for remuneration due to retirement	174.956	213.542	160.032	197.988
Other provisions	5.107.847	2.655.009	1.669.380	1.681.132
Currency translation differences	(1.182.570)	-	(1.182.570)	-
Leases	174.403	180.092	154.268	158.224
Advertising Expense	56.708	137.858	-	-
Risk hedging derivatives	1.589.611	3.175.282	29.249	3.134.190
	20.073.565	18.490.037	13.783.443	16.862.542
Net deferred tax assets in the statement of financial position	10.939.550	8.397.769	13.513.242	16.291.447

E.

	GROUP				
	01/01/2021	Debit (Credit) in profit and loss	Debit (Credit) in equity	31/12/2021	
Deferred tax Liabilities					
Toy available to a second	(139.788)	31.064		(108.724)	
Tax exempted reserves Currency translation differences		(300.029)	-	(300.029)	
Assets grants	(11.145)	1.777	-	(9.368)	
Rights-of-use assets (Leasing)	(61.978)	(90.995)	_	(152.974)	
Cost of capitalization from new connections	(877.244)	(300.711)	_	(1.177.955)	
	(9.675.846)	1.332.628		(8.343.218)	
Reputation & Clientele	(9.075.840)	1.332.028	-	(0.343.210)	
Risk hedging derivatives	(43.952)	43.952	-	-	
Total deferred tax liabilities	(10.809.953)	717.686	-	(10.092.268)	
Deferred tax assets					
Depreciation/Amortization	123.009	(5.888)	-	117.121	
Provision for bad debts	13.474.194	(1.646.432)	-	11.827.762	
Provision for obsolescence of inventory	200.041	(16.670)	_	183.371	
Provision for remuneration due to retirement	248.888	(65.845)	30.499	213.542	
Other provisions	22.495.603	(19.840.593)		2.655.009	
Foreign currency translation differences	942.180	(942.180)	-	-	
Leases	85.440	94.652	-	180.092	
Advertising expenses	-	137.858	-	137.858	
Risk hedging derivatives	-	(245)	3.175.527	3.175.282	
Total deferred tax assets	37.569.355	(22.285.343)	3.206.026	18.490.037	
Net deferred tax assets in the statement of financial position	26.759.402	(21.567.657)	3.206.026	8.397.769	

			GROUP	
	01/01/2022	Debit (Credit) in profit and loss	Debit (Credit) in equity	31/12/2022
Deferred tax Liabilities				
Tax exempted reserves	(108.724)	-	-	(108.724)
Foreign currency translation differences	(300.029)	300.029	-	-
Assets grants	(9.368)	865	-	(8.503)
Rights-of-use assets (Leasing)	(152.974)	-	-	(152.974)
Provision for bad receivables	-	-	-	-
Reputation & Clientele	(8.343.218)	526.308	-	(7.816.910)
Other adjustments	(1.177.955)	131.052	-	(1.046.903)
Total deferred tax liabilities	(10.092.268)	958.254	-	(9.134.014)
Deferred tax assets				
Depreciation/Amortization	117.121	(56.853)	<u>-</u>	60.269
Provision for bad debts	11.827.762	2.081.208	<u>-</u>	13.908.970
Provision for obsolescence of inventory	183.371	-	-	183.371
Provision for remuneration due to retirement	213.542	(13.963)	(24.624)	174.956
Other provisions	2.655.009	2.452.838	-	5.107.847
Foreign currency translation differences	-	(1.182.570)	-	(1.182.570)
Leases	180.092	(5.688)	-	174.403
Advertising Expenses	137.858	(81.149)	-	56.708
Risk hedging derivatives	3.175.282	(196.898)	(1.388.773)	1.589.611
Total deferred tax assets Net deferred tax assets in the statement of financial position	18.490.037	2.996.925	(1.413.397)	20.073.565
Total deferred tax assets	8.397.769	3.955.179	(1.413.397)	10.939.550

		СОМР	ANY	
	01/01/2021	Debit (Credit) in profit and loss	Debit (Credit) in equity	31/12/2021
Deferred tax Liabilities				
Tax exempted reserves	(139.788)	31.064	-	(108.724)
Foreign currency translation differences		(300.029)		(300.029)
Assets grants	(11.145)	1.777	-	(9.368)
Rights-of-use assets (Leasing)	(61.978)	(90.995)	-	(152.974)
Total deferred tax liabilities	(212.911)	(358.183)	-	(571.095)
Deferred tax assets				
Depreciation/Amortization	117.358	(6.293)	-	111.065
Provision for bad debts	13.159.940	(1.763.368)	-	11.396.572
Provision for obsolescence of inventory	200.041	(16.670)	-	183.371
Provision for remuneration due to retirement	237.122	(69.496)	30.362	197.988
Other provisions	20.115.968	(18.434.836)	-	1.681.132
Foreign currency translation differences	942.180	(942.180)	-	-
Leases Risk hedging derivatives	62.413	95.810	-	158.224
		-	3.134.190	3.134.190
Total deferred tax assets	34.835.022	(21.137.032)	3.164.552	16.862.542
Net deferred tax assets in the				
statement of financial position	34.622.111	(21.495.215)	3.164.552	16.291.447

Lin Dekis (Ore dit) in	
) in Debit (Credit) in ss equity	31/12/2022
	(108.724)
- 0.029	-
865 -	(8.503)
	-
	(152.974)
-	-
0.894 -	(270.201)
	53.627
9.513 -	12.716.085
	183.371
0.186) (17.771)	160.032
1.752) -	1.669.380
2.570) -	(1.182.570)
3.955) -	154.268
- (3.104.941)	29.249
3.612 (3.122.712)	13.783.442
1 2 3	0.186) (17.771) 1.752) - 2.570) - 3.955) - - (3.104.941)

24. Other long-term receivables

Other long-term receivables of the Group and the Company are analyzed as follows:

	GROUP		СОМ	PANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Natural gas guarantees paid	24.413.541	8.107.534	24.413.541	8.107.534
Rental guarantees paid	240.651	192.763	148.644	148.644
Other guarantees paid	339	339	539	539
Long-term trade receivables	71.381	68.076	48.920	68.076
Third Party fees for Sales Contracts	1.233.310	1.275.228	-	-
Balance	25.959.222	9.643.940	24.611.645	8.324.793

Increase in other long-term receivables is mainly due to the expansion of the Company's activities and the increase in natural gas prices.

25. Inventory

Inventory of the Group and the Company is analyzed as follows:

	GROUP		COMP	COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021	
Natural Gas	171.727.637	96.391.507	171.727.637	96.391.507	
Commodities	1.140.383	-	-	-	
Gas stations consumables	36.826	36.935	36.826	36.935	
Gas stations fixed assets spare parts	2.668.375	3.114.104	2.668.375	3.114.104	
Total	175.573.222	99.542.546	174.432.838	99.542.546	
Less: Provision for obsolescence	(833.504)	(833.504)	(833.504)	(833.504)	
Total	174.739.718	98.709.042	173.599.335	98.709.042	

In 2022, the amount of inventory included in the cost of sales stands at EURO 4.407.108.834 (2021: EURO 1.284.534.214) for the Group and EURO 4.010.440.403 (2021: 1.136.283.795) for the Company.

The increase is mainly due to the increase in gas prices.

26. Cash and cash equivalents

Cash and cash equivalents of the Group and the Company as at December 31st 2022 and December 31st 2021 are analyzed as follows:

	GRO	GROUP		PANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Cash on hand	54.350	39.910	43.732	30.960
Sight deposits	96.872.387	141.216.117	76.029.181	124.557.490
Time deposits	102.775.613	124.635.939	102.775.613	124.635.939
Balance	199.702.349	265.891.965	178.848.526	249.224.389

Cash and cash equivalents represent cash on hand and bank deposits available on demand. All the Group's sight deposits are denominated in Euro, except for four (4) sight deposits of the Company denominated in USD of total value 11.237,65 (Euro: 10.535,96). The abovementioned deposits are placed with Greek banks.

Furthermore, the Group holds restricted deposits amounting to \in 13.254.241 (2021: \in 7.074.056), which are placed in specific bank accounts to settle the Group's liabilities. These restricted deposits are classified in the item "Trade and other receivables" (Note 27).

27. Trade and other receivables

Total receivables of the Group and the Company are analyzed as follows:

	GROUP		COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Trade receivables				<u> </u>
Customers	235.647.406	210.759.570	130.392.153	116.300.138
Contractual receivables	287.964.996	135.431.233	199.204.525	71.895.536
Notes receivables	15.870.000	15.833.401	15.870.000	15.833.401
Cheques receivable	89.567.325	39.788.548	87.908.915	39.328.278
Short-term receivables from associates	136.855.403	147.021.983	171.574.316	188.337.234
Total Trade Receivables	765.905.130	548.834.735	604.949.909	431.694.586
Less: Provisions for impairment of trade receivables	(148.530.327)	(132.244.369)	(125.086.971)	(118.986.643)
Net Trade Receivables	617.374.803	416.590.366	479.862.938	312.707.944
Other Receivables				
Income tax advance payment	42.244.612	7.986.423	42.244.612	7.986.423
VAT receivable	3.612.862	1.737.473	18.984	6.672
Tax receivable from the Greek State	2.064.594	40.937.909	2.064.594	40.937.909
Prepayments to suppliers	55.239.821	49.134.452	50.177.186	48.712.671
Payroll and personnel prepayments	32.534	40.249	32.534	40.249
Other debtors	11.078.503	202.725	10.465.658	68.574
Repayments and Credits management accounts	129.699	119.800	333	183
Restricted deposits	13.254.241	7.074.056	11.654.241	7.074.056
Cash in transit	1.463.394	971.050	-	-
Short-term financial guarantees	15.568.617	46.178.000	15.568.617	46.178.000
Prepaid expenses	5.536.882	6.467.172	1.736.121	1.609.738
Revenue for the period collectible (except contractual receivables)	91.385	1.159	-	-
Other receivables from associates	40.958	844.948	40.958	844.948
Total other receivable	150.358.102	161.695.416	134.003.838	153.459.423
Less: Provisions for impairment of other receivables	(12.698)	(102.743)	(12.698)	(102.743)
Net other receivable	150.345.404	161.592.673	133.991.140	153.356.680
Trade and other receivables balance	767.720.207	578.183.038	613.854.077	466.064.623

The account "Prepayments to suppliers" is related to prepayments to Suppliers.

The amount in the item "Restricted deposits" pertains to a restricted amount in a bank account of the Company, used to serve its objectives.

The Company's trade receivables also include short - term receivables from associates (see Note 21). The reason for the increase in receivables compared to 31.12.2021 is mainly due to the increase in the global gas prices.

Trade and other receivables approach their fair value at the balance sheet date.

The cumulative impairment of the receivables of the Group and the Company as at 31.12.2022 amounts *Notes to financial statements*107

to EURO 148.5 million (2021: EURO 132.3 million) and 125.1 million (2021: EURO 119.1 million).

GROUP (2021)

	Total trade and other receivables reviewed	Total net trade and other receivables reviewed	Expected credit losses rate	Provision for credit losses
Receivables separately reviewed - impaired	166.353.834	162.421.289	72,87%	118.348.356
Receivables totally reviewed- impaired				
Updated	372.383.136	226.660.861	0,70%	1.587.261
From 1 to 30 days	11.903.053	6.521.542	15,29%	997.398
from 31 to 60 days	2.968.521	2.251.890	11,76%	264.830
from 61 to 90 days	1.336.877	1.081.045	22,46%	242.851
from 91 to 180 days	3.160.652	2.698.754	30,84%	832.313
from 180 days and over	14.478.797	13.134.198	76,70%	10.074.103
– Total	406.231.036	252.348.290	5,55%	13.998.756
General total	572.584.870	414.769.579		132.347.111

GROUP (2022)

	Total trade and other receivables reviewed	Total net trade and other receivables reviewed	Expected credit losses rate	Provision for credit losses
Receivables separately reviewed - impaired	220.710.156	130.049.145	95,97%	124.806.906
Receivables totally reviewed-impaired				
Updated	523.791.612	350.003.864	0,92%	3.219.872
From 1 to 30 days	28.460.399	12.589.487	15,66%	1.971.868
from 31 to 60 days	3.852.672	2.730.351	17,88%	488.236
from 61 to 90 days	4.379.989	2.184.827	33,87%	739.985
from 91 to 180 days	2.962.480	3.961.903	43,70%	1.731.365
from 180 days and over	32.558.215	30.120.993	51,74%	15.584.793
Total	596.005.367	401.591.425		23.736.119
General total	816.715.523	531.640.571	-	148.543.025

COMPANY (2021)

	Total trade and other receivables reviewed	Total net trade and other receivables reviewed	Expected credit losses rate	Provision for credit losses
Receivables separately reviewed - impaired	166.353.834	162.421.289	72,87%	118.348.356
Receivables totally reviewed- impaired				
Updated	240.610.846	131.744.081	0,06%	84.664
From 1 to 30 days	2.565.655	582.093	0,40%	2.330
from 31 to 60 days	399.097	398.894	0,04%	146
from 61 to 90 days	392.608	392.600	0,02%	95
from 91 to 180 days	1.320.566	1.251.646	19,67%	246.179
from 180 days and over	2.285.363	1.985.940	20,53%	407.616
Total	247.574.135	136.355.254	0,54%	741.030
General total	413.927.969	298.776.541	-	119.089.386

COMPANY (2022)

	Total trade and other receivables reviewed	Total net trade and other receivables reviewed	Expected credit losses rate	Provision for credit losses
Receivables separately reviewed - impaired	220.710.156	130.049.145	95,97%	124.806.906
Receivables totally reviewed-impaired				
Updated	371.364.543	248.755.225	0,01%	34.101
From 1 to 30 days	18.426.214	5.003.722	0,17%	8.738
from 31 to 60 days	30.156	22.068	18,43%	4.066
from 61 to 90 days	15.829	15.469	19,33%	2.990
from 91 to 180 days	99.181	91.924	19,42%	17.854
from 180 days and over	10.334.572	9.371.748	2,40%	225.013
Total	400.270.495	263.260.156	0,11%	292.763
General total	620.980.651	393.309.302		125.099.669

The movement in the allowance for bad receivables is as follows:

	GROUP			COMPANY	,
	31/12/2022 31/12/2021 31/12/2022		31/12/2022	31/12/2021	
Balance as at 1 January	(132.347.111)	(131.570.169)		(119.089.386)	(121.676.068)
Provision for the period	(23.584.187)	(5.525.423)		(10.510.284)	(704.586)
Used provision	4.500.000	-		4.500.000	-
Non-used provision	2.888.274	4.748.482	_	-	3.291.269
Closing balance as at 31 December	(148.543.025)	(132.347.111)		(125.099.669)	(119.089.386)

Allowance for impairment of receivables is made as follows:

a) The Group examines all overdue receivables and recognizes a provision per customer taking into account the delay of collection, the objective and qualitative aspects of each client, the existence of guarantees if any, as well as the existence of legal or other actions taken.

b) In order to secure its receivables, the Company has received letters of guarantee from customers amounting to Euro 164,8 million and has set up a notional pledge of Euro 300 k. on a quantity of sugar.

28. Share Capital

At 31/12/2022, the Company's paid share capital amounted to Euro 17.518.199 (2021: EURO 17.518.199) divided into 198.980 (2021: 198.980) common nominal shares of nominal value Euro 88.04 each.

According to the Shareholders Register of the Company, as at 31/12/2022, its shareholders were the following:

SHAREHOLDER	NO OF SHARES	PARTICIPATION PERCENTAGE AS AT 31/12/2021
GREEK STATE (H.R.A.D.F.)	129.337	65,00%
HELLENIC PETROLEUM HOLDINGS S.A.(ELPE)	69.643	35,00%
TOTAL	198.980	100,00%

29. Reserves

The reserves of the Group and the Company are analyzed as follows:

<u>Company</u>

	Statutory reserves	Special reserves	Reserve from translation of capital to euro	Extraordinary reserves	Reserves specially taxed	Hedge Reserve	Total
Balances as of January 1, 2021	60.210.673	101.407.265	12.228	81.228.031	1.504.062	-	244.362.259
Transfer to reserves	-	18.112.065	-	-	62.128	-	18.174.193
Gains / (Losses) from valuation of hedging transactions	-	-	-	-	-	(11.112.128)	(11.112.128)
Balances as at 31 December 2021	60.210.673	119.519.330	12.228	81.228.031	1.566.190	(11.112.128)	251.424.324
Balances as of January 1, 2022	60.210.673	119.519.330	12.228	81.228.031	1.566.190	(11.112.128)	251.424.324
Transfer to reserves	-	6.668.243	-	-	-	-	6.668.243
Gains / (Losses) from valuation of hedging transactions	-	-	-	-	-	11.008.426	11.008.426
Balances as at 31 December 2022	60.210.673	126.187.573	12.228	81.228.031	1.566.190	(103.702)	269.100.993

Group

	Statutory reserves	Special reserves	Reserve from translation of capital to euro	Extraordinary reserves	Reserves specially taxed	Other transactions	Hedge reserve	Total
Balances as of January 1, 2021	60.821.370	101.407.265	12.228	81.228.031	1.459.942	-	153.699	245.082.533
Transfer to reserves	521.978	18.112.065	-	-	62.128	(6.600)		18.689.572
Gains / (Losses) from valuation of hedging transactions	-	-	-	-	-	-	(11.240.301)	(11.240.301)
Other changes	-	-	-	-	-	-	-	-
Balances as at 31 December 2021	61.343.348	119.519.330	12.228	81.228.031	1.552.070	(6.600)	(11.086.602)	252.531.806
Balances as of January 1, 2022	61.343.347	119.519.330	12.228	81.228.031	1.552.070	(6.600)	(11.086.602)	252.531.804
Transfer to reserves	709.218	6.668.243	-	-	-	-	-	7.377.461
Gains / (Losses) from valuation of hedging transactions	-	_	-	_	-	_	4.923.831	4.923.831
Balances as at 31 December 2022	62.052.566	126.187.573	12.228	81.228.031	1.522.070	(6.600)	(6.162.771)	264.833.099

According to the provisions of the Greek corporate legislation, companies are required to transfer a minimum of 5% of their annual net profit to a statutory reserve until the reserve reaches one third (1/3) of the paid-in share capital. Statutory reserves are distributed only under the Company's liquidation, but it can be used to offset accumulated losses.

Extraordinary reserves include an amount of Euro 80,6 million, mainly formed within FYs 2007 and 2008 from taxed profits based on the decisions of the General Meeting in the respective FYs.

The remaining reserves were created according to special provisions of tax legislation and according to the decision of the General Meetings.

30. Dividends

According to the provisions of the Greek corporate legislation, Societe Anonyme are required to distribute each year, as a dividend, an amount that equals to 35% of the profits after taxes and after the formation of the statutory reserve. According to article 30 of Law 2579/98, from 1997 and thereafter, companies and organizations whose exclusive shareholder or shareholder by over 60% (of its share capital) is the Greek State, either directly or through another company or organization whose exclusive or major shareholder is the Greek State and operate as a Societe Anonyme, are required to distribute the entire dividend to the shareholders from the year 1997 onwards as determined by the company's articles of association or by law provisions.

31. Employee defined benefit obligations

The obligation of the Group towards employees working in Greece for future benefits depending on the years of service of each employee, is accounted for and presented on the basis of the employees' expected benefit payable at the reporting date, discounted at its present value, in relation to its future time of payment. Accrued benefits for each period are charged to profit and loss and increase the benefits liability. Benefits that are paid to employees that retire reduce this liability.

In 2022, the discount rate was set at 2,90% (2021: 0,75%) in order to reflect the rate of corporate bonds in the Eurozone. Specifically, the discount rate used was the yield of the iBoxx AA-rated Euro corporate bond 10+ as at the balance sheet date (31/12/2022).

The obligation of the Company to retired personnel was determined by an actuarial report that was prepared by an independent company of certified actuaries.

Since 2012, the Company pays part of the retirement/death liability through an insurance plan.

Number of employees and payroll cost are as follows:

	GF	GROUP		ANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Number of employees	114	115	31	35
Payroll expense analysis				
Payroll fees	(5.458.084)	(5.520.202)	(2.360.023)	(2.520.753)
Social security contributions	(1.556.990)	(1.593.008)	(568.545)	(605.932)
Costs	(7.015.074)	(7.113.210)	(2.928.568)	(3.126.685)
Provision for remuneration due to retirement	(43.651)	(38.275)	(15.365)	(17.041)
Total cost	(7.058.725)	(7.151.485)	(2.943.933)	(3.143.726)

Furthermore, the Group receives services from seconded personnel.

The movement in the net pension liability is as follows:

	GROUP		СОМ	PANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Amounts recognised in the Balance Sheet			<u>_</u>	
Present value of liability	795.253	970.647	727.416	899.945
Net liability in the Balance Sheet	795.253	970.647	727.416	899.945
Amounts recognised in the income statement				
Cost of current employment	36.406	32.077	8.615	11.113
Net interest on liability/(asset)	7.245	6.198	6.750	5.928
Service cost recognition	-	-	-	-
Cost of curtailments/settlements/termination of service	610.045	368.256	610.045	365.386
Total cost recognized in the income statement	653.696	406.531	625.410	382.427
Changes in present value of liability				
Opening present value of liability	605.262	1.037.033	899.945	988.010
Other spin off adjustments	-	-		
Cost of present employment	36.406	32.077	8.615	11.113
Cost of interest	7.245	6.198	6.750	5.928
Benefits paid by the employer	(717.163)	(492.217)	(717.163)	(488.950)
Cost of curtailments/settlements/termination of service	-	2.870		
Service cost for the period	-	-	-	-
Actuarial loss /(gain)-economic assumptions	(116.710)	9.826	(106.780)	9.697
Actuarial loss /(gain)-period assumptions	4.783	9.475	26.004	8.762
Closing present value of liability	(180.177)	605.262	117.371	534.560
Adjustments				
Adjustments in liabilities from changes in assumptions	(116.710)	(9.826)	(106.780)	(9.697)
Experience adjustments in liabilities	4.783	(9.475)	26.004	(8.762)
Total actuarial profit/(loss) in Equity	(111.927)	(19.301)	(80.776)	(18.459)
Changes in net liability recognized in the Balance Sheet				
Opening net liability	970.648	1.037.033	899.945	988.010
Other division adjustments	-	-	-	-
Benefits paid by the employer	(717.163)	(492.217)	(717.163)	(488.950)
Total expense recognized in the income statement	653.696	406.531	625.410	382.427
Total amount recognized in equity	(111.927)	19.301	(80.776)	18.459
Closing net liability	795.253	970.647	727.416	899.945

The actuarial valuation method applied is the Projected Unit Credit method.

The key financial sizes and the principal actuarial assumptions in respect of the parent company are as follows:

	COMPANY		
	31/12/2022	31/12/2021	
Discount rate	2,90%	0,75%	
Inflation rate	2,50%	1,80%	
Future salary increases	2,80%	1,80%	
Duration of liabilities	10,71	11,49	

Sensitivity Analysis:

These results depend on the assumptions used for the preparation of the actuarial study.

Thereafter, the sensitivity presented in the actuarial present value of the actuarial obligation (Defined Benefit Obligation - DBO) was reviewed as well as the provision for the regular service cost for the next year (Normal Cost - NC) through differentiating the key assumptions applied.

Therefore, as at 31/12/2022:

If we had used a higher discount rate by 0.5%, then the present value of the liability would be lower by approximately 4%, while if we had used a lower discount rate by 0.5%, then the present value of the liability would be higher by approximately 5%.

The corresponding sensitivity tests for the expected salary increase, i.e. the use of 0.5% higher expected salary increase would result in the actuarial obligation being higher by 5%, while the exact opposite change, i.e. the use of the expected salary increase lower by 0.5% would result in the actuarial liability being 4% lower.

	СОМРА	NY	
	Actuarial liability	Change rate	
Discount rate increase by 0,5%	695.112	-4,00%	
Discount rate decrease by 0,5%	761.819	5,00%	
Increase of expected salary increase by 0,5%	761.785	5,00%	
Decrease of expected salary increase by 0,5%	694.836	-4,00%	
	COMPANY		
	СОМРА	NY	
	COMPA Regular cost carried forward	NY Change rate	
Discount rate increase by 0,5%	Regular cost carried		
Discount rate increase by 0,5% Discount rate decrease by 0,5%	Regular cost carried forward	Change rate	

5.471

-7,00%

32. Lease liabilities

Decrease of expected salary increase by 0,5%

The Group has lease agreements related to operating leases of buildings and means of transportation.

	GRO	UP	COM	PANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Long-term Lease Liabilities	1.030.621	1.338.006	135.490	160.208
Short-term Lease Liabilities	474.663	965.536	102.322	558.990
Total	1.505.284	2.303.542	237.812	719.198

The movement for the period is analyzed as follows:

	GRO	UP	СОМІ	PANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Opening balance on 1/1/2022	2.303.542	2.223.839	719.198	260.056
Recognition of Lease Liabilities	227.483	1.007.610	117.900	986.531
Period interest	59.620	84.780	21.939	29.266
Payments	(1.016.088)	(1.007.391)	(551.952)	(551.358)
Impact of a change in lease terms	-	-	-	-
Adjustment from variable payments	-	-	-	-
Write-off of liabilities	-	-	-	-
Other Changes	(69.272)	(5.297)	(69.272)	(5.297)
Closing balance on 31/12/2022	1.505.284	2.303.542	237.812	719.198

The future minimum lease payments for buildings and means of transportation finance leases under non-cancellable operating lease agreements for the Group and the Company are as follows:

	GROUP					
		31/12/2022			31/12/2021	
Minimum future payments	Payments	Financial costs	Net present value	Payments	Financial costs	Net present value
Within the next 12						
months	512.298	(37.693)	474.605	1.016.709	(51.173)	965.536
From 1 to 5 years	1.066.786	(39.435)	1.027.350	1.355.541	(61.020)	1.294.522
More than 5 years	3.380	(51)	3.329	44.051	(566)	43.484
Total	1.582.464	(77.179)	1.505.284	2.416.301	(112.760)	2.303.542

		COMPANY				
		31/12/2022			31/12/2021	
Minimum future payments	Payments	Financial costs	Net present value	Payments	Financial costs	Net present value
Within the next 12 months	111.647	(9.325)	102.322	573.897	(14.908)	558.990
From 1 to 5 years	141.492	(6.002)	135.490	165.154	(4.946)	160.208
Total	253.139	(15.327)	237.812	739.051	(19.853)	719.198

Lease payments expenses not included in lease liabilities are recorded below as follows:

	GR	OUP	COMP	ANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Short-term leases & low value leases	50.361	37.745	44.281	31.865
Total	50.361	37.745	44.281	31.865

33. Government grants

Government grants relate to investments in property, plant and equipment and are recognized as income at the same period as the depreciation of the granted related tangible assets – mainly machinery. In accordance with the legislation under which the grants were obtained, several restrictions exist regarding the transfer of the subsidized machinery and the legal status of the subsidized company. During the

audits performed by the relevant authorities, there were no instances of non-compliance with these restrictions.

The movement in grants is analyzed as follows:

	GRC	DUP	COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Opening balance	3.147.894	3.301.332	3.147.894	3.301.332
Lease liability recognition	-	-	-	-
Grant Transfers	-	-	-	-
Amortization of grants	(155.957)	(153.438)	(155.957)	(153.438)
Total	2.991.936	3.147.894	2.991.936	3.147.894
Long term Balance	2.835.979	2.994.456	2.835.979	2.994.456
Short Term Balance	155.957	153.438	155.957	153.438

34. Other Provisions

Other provisions of the Group and the Company are analyzed as follows:

	GR	OUP	СОМІ	PANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Legal case provisions	488.276	100.000	-	-
Total	488.276	100.000	-	-
B 11	· · · · · · · · · · · · · · · · · · ·			

Provisions are presented in their entirety as long term provisions and are not recorded at discounted amounts, as there is no accurate estimate of the time of their payment.

	GROUP		COMPA	ANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Balance as of January 1	100.000	100.00	-	-
Additional provision in period	388.276	-	-	-
Revenue from non-used provisions	-	-	-	-
Balance as of December 31	488.276	100.000		-

35. Other long-term liabilities

Other long-term liabilities of the Group and Company are analyzed as follows:

	GROUP		COMP	ANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Financial rental guarantees collected	33.600	33.600	33.600	33.600
Financial customer guarantees collected	30.730.998	29.569.439	-	-
Non-assets grant	75.902	85.339	-	-
Other adjustments	44.120	44.120		
Total	30.884.620	29.732.498	33.600	33.600

36. Suppliers and other liabilities

The total liabilities of the Group and the Company towards suppliers and other third parties are analyzed as follows:

	GROUP		Γ	COMPA	ANY
	31/12/2022	31/12/2021		31/12/2022	31/12/2021
Suppliers					
Domestic Suppliers	39.670.842	38.635.428		20.867.105	25.538.884
Foreign Suppliers	120.570.936	20.074.569		120.570.936	20.074.569
Contractual liabilities	279.075.005	178.759.737		279.075.005	167.424.396
Short-term liabilities with related parties	14.617	17.285.810		91.493	2.444.382
Total trade liabilities	439.331.400	254.755.544		420.604.539	215.482.231
Other liabilities Social Security Institutions	221.675	214.878		69.901	77.036
VAT payable	12.231.990	11.218.181		12.171.361	11.146.862
Special Tax on Consumption	69.889	85.915		69.889	85.915
Other taxies and duties	1.621.557	1.971.123		214.933	241.586
Customers guarantees collected	8.982.254	3.951.356		5.241.488	3.951.356
Dividends payable	90.613.502	-		90.613.502	-
Other creditors	15.276.296	12.811.125		841.473	299.661
Electricity - gas subsidies	-	10.510.081		-	-
Poseidon Med II Program management	-	993.418		-	993.418
Remaining installments of participation					
in joint ventures & subsidiaries	15.228.348	18.680.617		15.228.348	18.680.617
Income carried forward	8.408	2.349		-	-
Expenses payable	44.135.433	2.632.374		8.621.053	1.526.183
Other liabilities to related parties	437.912	139.717		532.732	220.866
Other liabilities	161.913	99.066	_	161.673	99.066
Total other liabilities	188.989.176	63.310.200		133.766.353	37.322.566
Total suppliers and other liabilities	628.320.575	318.065.743		554.370.892	252.804.797

The contractual obligations include a provision for gas purchase in December 2022 and 2021 respectively.

37. Short-term loans

In 2022, the Group used the bank credit lines. Short-term loans are as follows:

	GRO	UP
	31/12/2022	31/12/2021
Loans	6.000.000	4.000.000
Total	6.000.000	4.000.000

Given the new developments related to the energy crisis, the Parent and the Group's subsidiary Natural Gas - Hellenic Energy Company made use of the bank credit lines during the year. More specifically, the Parent Company used its credit lines at the amount of up to \in 335,000,000 and at the end of the year there was no outstanding amount, while Natural Gas - Hellenic Energy Company used its credit lines at the amount of up to \in 190,000,000 and at the end of the year outstanding amount was \in 6,000,000.

38. Risk management objectives and policies

The Group is exposed to various financial risks, the most significant of which are: the market risk, which includes foreign exchange risk, interest rate risk and price risk, credit risk, liquidity risk and capital risk. The Group's policies, aimed at managing the relevant risks, focus on minimizing the negative impact they may have on the financial position and the performance of the Group.

In the beginning of 2022, Russia invaded Ukraine, starting a war that looks set to last. While Europe, just like the entire globe, was recovering from the shock caused by the pandemic, before it could even return to "normality", Europe it had to address the outbreak of completely new, unprecedented conditions worsening economic and social instability. The combination of recent geopolitical developments around Ukraine, along with the ensuing energy crisis, not only perpetuates but also amplifies the problems identified in the global supply chain as a consequence of the pandemic. High levels of inflation indirectly affect the demand as well. Nonetheless, after at least a decade and following the path of other central banks led by the USA, the European Central Bank has introduced successive interest rate increases. This increase in interest rates is a central banks' intervention aimed at indirectly controlling the rapid and unrestrained price increases through reducing the demand. The current inflation has some specific features that make it difficult to address. It's mainly characterized by the fact that it is - to a significant extent - linked to the increase in energy prices, as well as food consumption. Therefore, the policy of increasing interest rates, as a tool applied in order to deal with inflation, could push economies into stagflation, featuring slow growth, high unemployment and rising prices.

Thus, estimates of an upcoming recession in the forthcoming period are all the more increasing until the inflation decelerates and private consumption accelerates.

The economic impact of the current crisis on the global economy and businesses in total cannot be estimated with reasonable certainty at this stage. The Management constantly assesses the situation as well as its potential consequences, in order to ensure that the necessary actions are taken to minimize the impact on the Group's operations in Greece.

The gas market in Greece did not face any problem. The Company and the Group supplied their customers as usual.

As aforementioned, the key Group's financial instruments are cash, bank deposits, trade and other

receivables and liabilities and bank loans. The Group Management regularly assesses and reviews the relevant policies and procedures related to financial risks management, described below:

I. Market risk

- Interest rate risk: The Management constantly monitors fluctuations in interest rates and the Group's financing needs.
- Exchange rate risk: The Group is exposed to foreign currency risk due to changes in the US dollar exchange rate with respect to the supply of natural gas, which is carried out based on the contracts with foreign suppliers, mainly expressed in U.S. dollars. As at 31/12/2022, if the exchange rate of euro against the U.S. dollar had increased by 10% and all other variables remained unchanged, the results before tax of the current fiscal year of the parent company and the Group would be increased by Euro 15.960 k and respectively the results after tax of the Group for the closing year would be increased by Euro 12.449 k, due to the valuation of acquisitions and liabilities to suppliers that are mainly expressed in U.S. dollars. Moreover, if the exchange rate of Euro had decreased against the U.S. dollar by 10%, and all other variables remained unchanged, the results before tax of the group would be decreased by Euro 19.507 k and respectively the results after tax of the Group for the closing year would be decreased by Euro 15.215 k, due to valuation of acquisitions and liabilities to suppliers after tax of the Group for the closing year would be decreased by Euro 15.215 k, due to valuation of acquisitions and liabilities to suppliers after tax of the Group for the closing year would be decreased by Euro 15.215 k, due to valuation of acquisitions and liabilities to suppliers and liabilities to suppliers.
- <u>Price risk:</u> The Group is subject to risk from changes in the prices of other competitive products as the cost of natural gas is affected by fluctuations in oil prices and natural gas selling prices are partially affected compared to competitive fuel. The pricing policy of the Group is based on the natural gas supply price.

II. Credit risk

Credit risk arises from cash, derivative financial instruments and bank deposits, as well as credit exposure to the Group's wholesale and retail customers.

Credit to customers is in accordance with the Company and the Group's credit policy, and interest is accounted for on customers if repayment deadlines are exceeded.

The Company has a concentration of sales, as approximately 36,21% of its total sales are to Public Power Corporation SA, 11,36% to BulgarGaz, and 8,03% to HERON ENERGY SERVICES.

The Company's Management monitors, on a regular basis, the financial position of its customers, the size and limits of the credit provided. At the end of the year, Management considered that the credit risk was covered by the collateral and the provisions it deemed necessary at the time, together with the actions undertaken by the Company to provide guarantees and repayment plan by overdue customers. The most significant credit risk if the counterparties fail to meet their obligations with respect to each category of recognized financial asset is the carrying amount of such receivables as shown in the Balance Sheet less the value of the guarantees and collaterals, as recorded in Note 40.

III. Liquidity risk

Liquidity risk is addressed through the availability of sufficient cash available and credit lines with cooperating banks. Existing available unused approved bank credit to the Group is sufficient to address any potential shortage of cash.

The following table gives an analysis of the financial liabilities and liabilities of derivative financial

instruments in accordance with their contractual settlement dates.

GROUP			
As at 31/12/2022	Up to 1 year	From 1 to 5 years	Over 5 years
Loans	6.000.000	-	-
Financial liabilities Suppliers and other	474.605	1.027.350	3.329
liabilities	628.320.575	-	-
Financial derivatives	7.900.989	-	-

As at 31/12/2021	Up to 1 year	From 1 to 5 years	Over 5 years
Loans	4.000.000	-	-
Financial liabilities Suppliers and other	965.536	1.294.522	43.484
liabilities	318.065.743	-	-
Financial derivatives	14.213.593	-	-

COMPANY

As at 31/12/2022	Up to 1 year	From 1 to 5 years	Over 5 years
Financial liabilities	102.322	135.490	-
Suppliers and other liabilities	554.370.892	-	-
Financial derivatives	132.952	-	-

As at 31/12/2021	Up to 1 year	From 1 to 5 years	Over 5 years
Financial liabilities	558.990	160.208	-
Suppliers and other liabilities	252.804.797	-	-
Financial derivatives	14.246.318	-	-

IV. Capital risk management

The Group's capital risk management objective is to ensure the going concern principle, to distribute profits to shareholders and benefits to other stakeholders and to maintain a capital structure which will decrease the cost of capital.

The capital is reviewed on the basis of a leverage ratio. The rate is calculated as the net debt divided by the total capital. Net debt is calculated as total liabilities less cash available. The total capital is calculated based on the equity recorded in the balance sheet. In particular:

	GRO	OUP	COMP	ANY
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Total Liabilities	728.435.650	429.974.032	596.666.265	328.183.410
Less: Cash and cash equivalent (Note 26)	(199.702.349)	(265.891.965)	(178.848.526)	(249.224.389)
Net debt	528.733.301	164.082.067	417.817.739	78.959.021
Total Equity	603.476.221	639.510.501	551.468.116	609.963.098
Net debt/Total Equity	87,61%	25,66%	75,76%	12,94%

39. Related parties transactions and balances

The Company considers as related parties:

a) Subsidiaries consolidated under full consolidation method

b) Associates and Joint Ventures of the Group consolidated under the equity method, as well as

c) Associates that are not consolidated but which are under joint control with the Group due to the joint participation of the Greek State and disclosure significant transactions with the Group. The Associates and Joint Ventures transactions and balances, which are either consolidated or not, are referred at 100% of them. The Company's and the Group's transactions and balances, in FY 1/1-31/12/2021 and 1/1-31/12/2022, respectively, are as follows:

	GROU	P	GF	ROUP	COMP	ANY	COMP	ANY
	For the period 1/	1-31/12/2021	For the peri	od 31/12/2021	For the period 1	/1-31/12/2021	For the period	31/12/2021
	Disposals to related parties	Acquisitions from related parties	Receivables from related parties	Liabilities to related parties	Disposals to related parties	Acquisitions from related parties	Receivables from related parties	Liabilities to related parties
Transactions with subsidiaries Transactions	-	-	-	-	125.954.204	444.512	41.359.096	157.655
with other related parties	948.611.753	92.397.754	147.866.931	17.425.527	948.470.386	39.964.053	147.823.086	2.507.593
	GROU	P	GF	ROUP	COMP	ANY	COMP	ANY
	For the period 1/	1-31/12/2022	For the peri	od 31/12/2022	For the period 1	/1-31/12/2022	For the period	31/12/2022
	Disposals to related parties	Acquisitions from related parties	Receivables from related parties	Liabilities to related parties	Disposals to related parties	Acquisitions from related parties	Receivables from related parties	Liabilities to related parties
Transactions			-	-	308.267.256	736.549	34.719.207	171.697
with subsidiaries Transactions	-	-						

The Group's and Company's Board of Directors Chairman and members fees are as follows:

					31/12/2022	31/12/2021
Compa	any's BoD membe	ers fees			502.494	441.064
Conso	lidated Subsidiari	es' BoD membe	ers fees		188.270	187.046
Group	's BoD member	s fees			690.765	628.110
	GR	OUP		СОМ	PANY	
	31/12/2022	31/12/2021	31/1	2/2022	31/12/2021	
Liabilities	20.032	17.577		13.835	11.396	

The Company's key shareholder is the Hellenic Republic Asset Development Fund (HRADF). There are no balances directly from HRADF but from companies or Legal Entities of Public Law managed by HRADF. The Public Power Corporation holds the most significant balances from these transaction.

40. Commitments and contingent receivables and liabilities

40.1 Contingent liabilities and receivables

	GR	OUP	COMPANY		
	31/12/2022 31/12/2021		31/12/2022	31/12/20201	
Contingent liabilities					
contracts to be executed	10.605.537	7.603.701	10.605.537	7.603.701	
Suppliers and third parties guarantees	882.433.744	270.108.618	846.984.633	241.999.377	
Parent company corporate guarantee to an associate	-	1.000.000	-	1.000.000	
Total contingent liabilities	893.039.281	278.712.319	857.590.170	250.603.078	
Contingent receivables					
Customers guarantees	166.430.883	126.707.586	164.793.532	125.596.236	
Suppliers guarantees	4.703.271	3.848.420	4.513.271	3.698.420	
Total contingent receivables	171.134.154	130.556.006	169.306.803	129.294.656	
Total contingent receivables of discontinued operations	-	804.163	-	804.163	

According to RAE decision 911/2023, in the context of supply security, natural gas providers, the parent company included, were obliged to reserve space, store and maintain stored quantities in underground warehouses of neighboring Member States (Italy and Bulgaria) and keep them available, through the Stock Exchange, in the period 01.11.2022-31.03.2023. Since the supply price of these quantities was higher than their availability price, the providers are entitled to be compensated by DESFA through contracts-for-differences (CfD). It is expected that in 2023 the relevant procedures, the amounts per provider and DESFA starting the repayments (which will recover the relevant amount through the SECURITY OF SUPPLY LEVY (TAE)) will be finalized.

DEPA COMMERCIAL S.A. (DEPA S.A.) Annual Financial Statements for FY from 1 January 2022 to 31 December 2022

40.2 Commitments

a) Insurance coverage: The items of the Group's property, plant and equipment are located all over Greece. The Group has insurance coverage for its property, plant and equipment for various categories of risks, as defined by independent insurance brokers and the Management considers this coverage to be adequate.

b) Natural Gas purchase agreements:

i) On 26 July 1988, the company DEP S.A. signed a long-term contract with the Russian company SOJUZGAZEXPORT for purchase and import of natural gas. The contract was transferred to DEPA S.A. The delivery of natural gas started in 1996. The contract expires in 2026. The quantitative and qualitative characteristics of the gas as well as the gas price are defined using the specific formula, which is also defined in the contract.

ii) In February 1988, DEP S.A. signed a long-term contract with the Algerian State owned company Sonatrach for purchase and import of liquefied natural gas The contract was transferred to DEPA S.A. The contract came into force in 2000 and its term of duration is 21 years (till 2021) and was renewed (till end 2023). The specific quantity and the quality specifications of the product to be delivered are determined in the contract. The natural gas price is also determined using the formula which is defined in the contract.

iii) On 23 December 2003 DEPA S.A. signed a long-term contract with the Turkish company "Botas" for purchase and import of natural gas. The contract came into force in 2007 and its term of duration is till January 1st, 2022. DEPA received in 2022 and will receive in 2023 quantities of gas that it did not receive in previous years in order to complete the contract. The specific quantity and the quality specifications of the product to be delivered are determined in the contract. As from June 15th, 2011, the natural gas price is determined using the particular formula, following the decision issued by the Stockholm International Court of Arbitration (ICC).

iv) On 19 September 2013, DEPA S.A. signed a long-term contract with the Azerian company "SOCAR" for the purchase and import of natural gas from 2020 to 2044. The price of the gas is determined using the formula which is defined in the contract. The contract has been fully transferred by SOCAR to Azerbaijan Gas Supply Company (AGSC), based on a tripartite agreement signed on 17 December 2013.

40.3 Other contingent liabilities

COMPANY	COUNTRY	UNAUDITED YEARS BY COMPETENT TAX AUTHORITIES
DEPA COMMERCIAL S.A.	GREECE	2017-2022
NATURAL GAS-HELLENIC ENERGY COMPANY	GREECE	2017-2022
GASTRADE	GREECE	2017-2022
NORTH SOLAR S.A.	GREECE	2021-2022
NEW SPES CONCEPT S.A.	GREECE	2019-2022
NORTH SOLAR 1 S.A.	GREECE	2022

The Group's companies have not yet been audited by the tax authorities for the following years:

For the Group's companies operating in Greece the audit for the issuance of the Tax Compliance Certificate for FY 2022 is in progress and the relevant tax certificates are to be issued after the publication of the financial statements of 31.12.2022 and no significant burden for the Company and the Group is expected.

Regarding FYs from 2011 to 2015, the parent company was subject to tax audit of the Company's Auditors and received Tax Compliance Report in accordance with paragraph 5, Article 82, Law 2238/1994 and Article 65A, paragraph 1, Law 4171/413. Pursuant to POL.1006/5.1.2016 the companies which have received tax certificate with unqualified conclusion are not exempted from the statutory tax audit of the competent tax authorities. Thus, the Greek tax authorities have the right to conduct tax audit of the FYs they choose, taking into account the procedures performed for the issuance of the tax compliance certificate.

Moreover, in compliance with the relative legislation, for FY 2017 onwards, the audit and issue of the Tax Compliance Certificate is performed on a voluntary basis. The parent company received Tax Compliance Certificate for FYs 2016, 2017, 2018, 2019, 2020 and 2021, while the subsidiary "NATURAL GAS-HELLENIC ENERGY COMPANY" – from 2017 onwards.

Following the finalization of the tax audits, Management does not expect significant tax liabilities to arise other than those recorded and reflected in the Group's and Company's financial statements. It should be noted that, according to the issues mentioned in the Circular POL. 1192/2017, the right of the State for a tax charge up to and including the year 2016 has lapsed unless the specific provisions on 10-year, 15-year and 20-year limitation periods apply.

Law 4994/2022 has introduced a temporary mechanism for the return of part of revenue from electricity suppliers. The Law imposes a special levy obligation on electricity suppliers' excess (windfall) revenues from activities in the domestic retail market of electrical energy during the period Law 4951/2022 is effective. It was also projected that assumptions, parameters and methodology applied for the purposes of undercalculating the levy would be based on RAE recommendations. Until the preparation of the financial statements date for the year ended 31/12/2022, the Competent Authorities have yet to determine the methodology. Therefore, the subsidiary company could not proceed calculate a reliable estimate of the levy. The methodology in question is expected to be published in the following period within the financial year 2023.

40.4 Litigations

The Group makes provisions in the financial statements regarding pending legal cases, when it is probable that an outflow of resources will be required to settle the liability and this amount can be estimated reliably. In this context, on 31.12.2022, the Group recognized provisions of \in 488 k (31.12.2021: \in 100 k) for legal cases (Note 34).

ELFE litigation

i) Regarding the counter lawsuits - debts (DEPA lawsuit) and invalidity of the oil contract clause for the period 2010-2015 (ELFE lawsuit): Recently, Num. 689/10.02.2022 decision of the Three-Member Court of Appeal of Athens was issued following the appeals made by both sides against Num. 3038/2019 decision of the Athens Multi-Member Court of First Instance, following which the Court of Appeal - on the one hand - accepted the appeal of DEPA and rejected the appeal of ELFE, while - on the other hand - partially accepted the lawsuit of DEPA against ELFE for the amount of € 71,507,201.09 plus interests, and ELFE's lawsuit against DEPA was completely dismissed. On 10.03.2022, ELFE filed

the appeal against Num. 689/2022 decision of the Three-Member Court of Appeal of Athens, heard on 08.05.2023. The decision of the Supreme Civil and Criminal Court of Greece (Areios Pagos) is pending.
ii) Regarding the lawsuit of ELFE for invalidity of an oil clause of contracts for the period 2002-2009: Num. 991/23.03.2022 decision of the Athens Multi-Member Court of First Instance was issued, which postpones, according to article 249 of the Code of Civil Procedure the lawsuit hearing till the issue of an irrevocable decision on the above case i.

40.5 Liens

Group

In order to secure trade receivables, the Parent Company has filed liens on their property, totaling Euro 75 million.

41. Measurement of Fair Value of Financial Instruments

The fair value of a financial asset is the amount received for the sale of an asset or paid for the settlement of a liability in a normal transaction between two traders at the valuation date. Fair value valuation methods fall into three categories:

Level 1: Investments that are valued at fair value based on quoted (unadjusted) prices in active markets for comparable assets or liabilities.

Level 2: Investments that are valued at fair value, using valuation techniques for which all inputs that significantly affect the fair value, are based (either directly or indirectly) on observable market data.

Level 3: Investments that are valued at fair value, using valuation techniques, in which the data that significantly affects the fair value, is not based on observable market data.

Assets and liabilities financial derivatives as well as Investments in securities, for the Group and the Company carried at fair value in 2022 and 2021 are as follows:

Cloup								
		Balance as at	31/12/2022			Balance as	at 31/12/202	1
	Level 1	Level 2	Level 3	Total	Level 1	Level 2	Level 3	Total
<u>Assets</u>								
investment in securities		-	143.000	143.000		-	-	-
Liabilities								
Risk hedging derivatives	1.409.656	6.491.333	-	7.900.989	14.213.593	-	-	14.213.593
Company								
		Balance as at	31/12/2022			Balance as	at 31/12/202	1
	Level 1	Level 2	Level 3	Total	Level 1	Level 2	Level 3	Total
<u>Assets</u>								
investment in securities		-	143.000	143.000		-	-	-
Liabilities								
Risk hedging derivatives	132.952	-	-	132.953	14.246.318	-	-	14.246.318

The fair value of financial assets traded in active markets is determined based on the quoted prices effective as at the Balance Sheet date. An "active" market exists when prices are readily available and regularly reviewed, quoted by stock exchange, stockbroker, segment, rating agency or regulator. These financial instruments are included in level 1.

The fair value of financial assets not traded in active markets (e.g. derivative contracts outside the derivatives market) is determined applying valuation techniques, based largely on available information about active market transactions, while using as few estimates of the entity as possible. These financial instruments are included in level 2.

If valuation techniques are not based on quoted prices, then financial instruments are included in level 3.

There is no obligation to disclose levels 1,2,3 since the fair value of those assets measured at unamortized cost does not materially differ from the corresponding accounting value. There are no transfers between the levels compared to 31 December 2021.

42. Financial derivatives

Derivative financial instruments are used only for hedging purposes and not as for-profit investments. However, when such derivatives do not qualify for hedge accounting, they are classified as "available for sale derivatives".

The total fair value of a risk hedging derivative is classified as a non-current asset or liability when its maturity date is later than 12 months, otherwise it is classified as a current asset.

Cash flows hedging derivatives

During the year ended as at 31 December 2022, revenue related to contracts settled within the year, amounting to \in 13.001.342 (in 2021 cost 1.848.567) was transferred to the Statement of Comprehensive Income. This amount is offset with revenue and expenses arising from transactions with the Group's and the Company's customers and suppliers.

Regarding the on-going contracts to be settled within the year, the total valuation regarding the Company is negative standing at €132.952 (2021: negative €14.246.318). The financial instruments relate to natural gas price swaps.

The Group's and the Company's financial derivatives as at 31/12/2022 and 31/12/2021 are presented below as follows:

	GR	OUP	COM	COMPANY		
Liabilities from derivatives	31/12/2022	31/12/2021	31/12/2022	31/12/2021		
- Cash flow hedging						
Natural gas & electric energy price swaps	7.900.989	14.213.593	132.952	14.246.318		
Total liabilities from derivatives	7.900.989	14.213.593	132.952	14.246.318		
Long-term liabilities from derivatives	0	0	0	0		
Short-term liabilities from derivatives	7.900.989	14.213.593	132.952	14.246.318		

DEPA COMMERCIAL S.A. (DEPA S.A.)

Annual Financial Statements

for FY from 1 January 2022 to 31 December 2022

(The amounts are stated in Euro unless otherwise mentioned)

43. Financial assets and financial liabilities: presentation

The Group's financial assets and financial liabilities are analyzed per category as follows:

		GRO	<u>UP</u>			GROUP			
31.12.2022 Financial Assets	Net book value	Fair value through other comprehensive results	Risk hedging derivatives (Fair value)	Total	<u>31.12.2021</u> Net book value	Fair value through other comprehensive results	Risk hedging derivatives (Fair value)	Total	
Other long-term receivables	25.959.222	-	-	25.959.222	9.643.940	-	-	9.643.940	
Investments in securities	-	143.000	-	143.000	-	-	-	-	
Trade and other receivables	767.720.207	-	-	767.720.207	578.183.038	-	-	578.183.038	
Cash and cash equivalents	199.702.349	-	-	199.702.349	265.891.965	-	-	265.891.965	
Total	993.381.778	143.000	-	993.524.778	853.718.944	-	-	853.718.944	

Total

29.732.498

14.213.593

4.000.000

366.011.834

318.065.743

<u>31.12.2022</u>					<u>31.12.2021</u>		
Financial Liabilities	Net book value	Fair value through other comprehensive results	Risk hedging derivatives (Fair value)	Total	Net book value	Fair value through other comprehensive results	Risk hedging derivatives (Fair value)
Other long-term liabilities	30.884.620	-	-	30.884.620	29.732.498	-	-
Trade and other payables	628.320.575	-	-	628.320.575	318.065.743	-	-
Financial derivatives	-	-	7.900.989	7.900.989	-	-	14.213.593
Loans	6.000.000	-	-	6.000.000	4.000.000	-	-
Total	665.205.196	-	7.900.989	673.106.184	351.798.241	-	14.213.593

COMPANY

COMPANY

<u>31.12.2022</u>					<u>31.12.2021</u>			
Financial Assets	Net book value	Fair value through other comprehensive results	Risk hedging derivatives (Fair value)	Total	Net book value	Fair value through other comprehensive results	Risk hedging derivatives (Fair value)	Total
Other long-term receivables	24.611.645	-	-	24.611.645	8.324.793	-	-	8.324.793
Investments in securities	-	143.000	-	143.000	-	-	-	0
Trade and other receivables	613.854.077	-	-	613.854.077	466.064.623	-	-	466.064.623
Cash and cash equivalents	178.848.526	-	-	178.848.526	249.224.389	-	-	249.224.389
Total	817.314.248	143.000	-	817.457.248	723.613.805	-	-	723.613.805

31.12.2022

Fair value Fair value through other **Risk hedging** through other **Risk hedging Financial Liabilities** derivatives comprehensive comprehensive derivatives Net book value results (Fair value) Total Net book value results (Fair value) Total Other long-term liabilities 33.600 33.600 33.600 33.600 -Trade and other payables 554.370.892 554.370.892 252.804.797 252.804.797 ----Financial derivatives 132.952 132.952 14.246.318 14.246.318 -Total 554.404.492 132.952 554.537.444 252.838.397 14.246.318 267.084.715 --

31.12.2021

44. Other significant disclosures

The Final Investment Decision (FID) for the construction of the Independent Natural Gas System (INGS) of Alexandroupolis was made on 27.01.2022 by the shareholders of Gastrade SA. The FID is the last and most important milestone, before entering the project's construction phase. Gastrade SA General Assembly unanimously approved that all requirements for the materialization of the project have been secured, and the project is on track in line with its schedule. The construction and operation of the Alexandroupolis Liquefied Natural Gas (LNG) Terminal will contribute to the energy security, liquidity and diversification of the country and the entire Southeastern Europe region, strengthening the strategic role of Greece and offering alternative sources and routes for the supply of natural gas in the area. The Floating Storage and Regasification Unit (FSRU), with a capacity of 153,500 sq.m. of LNG, will be connected to the National Natural Gas Transmission System of Greece with a 28 km long pipeline, through which the gasified LNG will be transmitted to the markets of Greece, Bulgaria and the wider region, from Romania, Serbia and North Macedonia, as all the way to Moldova and Ukraine. The Terminal is expected to operate by the end of 2023, with the contracted regasification capacity already reaching up to 50% of its technical capacity of 5.5 billion sq.m. per year. It is noted that Alexandroupolis INGS is included in and financed by the Operational Program of the NSRF "Competitiveness, Entrepreneurship and Innovation 2014-2020" (EPAnEK), with an amount of public spending of 166.7 million Euros.

45. Events subsequent to the Statement of Financial Position

There were no other events subsequent to the financial statements as of 31 December, 2022 that would have a significant effect on the Financial Statements and should either have been disclosed or affect the amounts of the publicized financial statements.

46. UNBUNDLED FINANCIAL STATEMENTS

DEPA COMMERCIAL SA STATEMENT OF FINANCIAL POSITION 31/12/2022	Total company	NG supply	Electricity Supply	Other operations
ASSETS				
Fixed assets				
Tangible assets	16.491.276	16.491.276	0	0
Investment property	3.292.725	0	0	3.292.725
Intangible assets	195.955	195.955	0	0
Investments in subsidiaries	107.812.050	107.812.050	0	0
Investments in joint ventures and associates	15.540.624	15.540.624	0	0
Investment in securities	143.000	143.000	0	0
Right-of-use assets	231.927	231.927	0	0

(The amounts are stated Other Long term receivables	24.611.645	24.611.645	0	0
Deferred tax assets	13.513.241	13.488.535	0	24.707
Total fixed assets	181.832.443	178.515.011	0	3.317.432
			-	
Current assets				
Inventories	173.599.335	173.599.335	0	0
Trade and other receivables	613.854.077	608.970.890	4.803.927	79.261
Cash and cash equivalents	178.848.526	178.472.945	375.582	0
Total current assets	966.301.938	961.043.169	5.179.508	79.261
TOTAL ASSETS	1.148.134.381	1.139.558.180	5.179.508	3.396.693
LIABILITIES				
Equity				
	FE1 460 116		2 524 400	2 262 002
Total Equity	551.468.116	545.570.534	2.534.490	3.363.093
LIABILITIES				
Long-term Liabilities				
Defined employee benefit obligations	727.416	684.789	42.627	0
Deferred tax liabilities	0	0	0	0
Long-term government grants	2.835.979	2.835.979	0	0
Other provisions	0	0	0	0
Long-term lease liabilities	135.490	135.490	0	0
Other long-term liabilities	33.600	0	0	33.600
Total long-term liabilities	3.732.485	3.656.259	42.627	33.600
Short-term liabilities				
Trade and other liabilities	554.370.892	551.768.500	2.602.392	0
Short-term lease liabilities	102.322	102.322	0	0
Income tax payable	38.171.657	38.171.657	0	0
Short-term government grants	155.957	155.957	0	0
Derivatives	132.952	132.952	0	0
Total current liabilities	592.933.780	590.331.388	2.602.392	0
Total liabilities	596.666.265	593.987.647	2.645.019	33.600
TOTAL EQUITY AND LIABILITIES	1.148.134.381	1.139.558.180	5.179.508	3.396.693

DEPA COMMERCIAL SA INCOME STATEMENT 1/1/2022 - 31/12/2022	Total company	NG supply	Electricity Supply	Other operations
_				
<u>Turnover</u>	3.669.037.325	3.669.037.325		
Turnover (sales)	254.242	254.242	-	-
NG transit fees & other network services	574.097.988	574.097.988	-	-
Sales in Bulgaria (gas supply license)	8.923.854	574.097.900	- 8.923.854	-
Revenue from electric energy	0.925.054	-	0.923.034	-
Sale of Materials Total turnover	4.252.313.408	4.243.389.554	8.923.854	-
			0.020.001	
Expenses & Purchases				
Cost of sales	(4.010.440.403)	(4.003.690.113)	(6.750.290)	0,00
Other cost of sales expenses	(131.301.500)	(129.255.374)	(2.046.127)	0,00
Other distribution expenses	(8.451.958)	(8.451.958)	0,00	0,00
Remuneration and staff costs	(4.157.839)	(3.914.257)	(243.582)	-
Third party fees	(13.713.727)	(13.360.942)	(352.786)	-
Utilities	(3.389.806)	(3.096.655)	(96.138)	(197.013)
Taxes – duties	(1.050.640)	(1.019.625)	(3.232)	(27.783)
Other expenses	(10.507.840)	(10.148.862)	(358.551)	(427)
Depreciation	(2.015.418)	(1.841.562)	-	(173.856)
Provisions	(13.492)	(12.701)	(791)	-
Other income / (expenses)	(45.154.107)	(46.084.496)	457.319	473.070
Amortisation of Grants	155.957	155.957	-	-
(Losses) / Profit from exchange differences	6.197.037	6.197.037	-	-
Total Expenses & Purchases	(4.223.843.739)	(4.214.523.551)	(9.394.178)	73.991
Operating Profit	28.469.669	28.866.003	(470.325)	73.991
			(, 0.001
Income from investments	5.413.828	5.413.828	-	-
Income from disposal of investments	-	-	-	-
Profit from distribution to owners	-	-	-	-
Financial expenses	(8.614.259)	(8.614.039)	(220)	-
Financial income	11.660.411	11.660.253	158	-
Earnings before tax	36.929.649	37.326.045	(470.387)	73.991

General Principles

DEPA Commercial SA prepares, submits for audit and publishes annual financial statements under IFRS in accordance with the relevant provisions of CL 4548/2018, as well as Laws 3229/2004 and 3301/2004.

On 16.04.2021 RAE decision Num. 250/2021, granted an Electricity Supply License to DEPA Commercial SA.

The Company, as a horizontally Integrated Enterprise, took into account the provisions of Law 4001/2011 (Government Gazette A '179) and decision 162/2019 (Government Gazette B' 1730/2019) regarding the preparation of separate accounts of the electricity supply operation and gas of horizontally integrated enterprises. Based on the above, it maintains separate accounts, Statement of Financial Position and Income Statement, for the operations of Electricity Supply (Trading) and Gas Supply (Trading).

The Company's other operations, excluding gas and electricity, are recorded in consolidated non-unbundled accounts (Other operations).

At the end of the year, the Company prepares and publishes – in compliance with IFRS – unbundled income statement (before tax) and balance sheet per operation. The sums of the unbundled Financial Statements are equal to and agree with the Balance Sheet and the Income Statement of DEPA Commercial SA, prepared in accordance with the International Financial Reporting Standards, with the exception of income tax, since the unbundled Financial Statements are presented at earning before tax level.

The above statements are included in the notes to the Company's annual financial statements, are approved and legally signed, and contain Auditors certificate, making reference to RAE approved regulations, in accordance with paragraph 4, article 141, Law 4001/2011.

Separation Methods and allocation rules

Introduction

The Company maintains separate accounts and prepares unbundled financial statements for the following operations:

1) Natural Gas Supply
 2) Electricity Supply
 3) Other Operations

The separate internal accounts include the balance sheet and income statement, as would be prepared if performed by different companies following the standards and the rules approved by RAE, governing them on a case-by-case basis. Unbundled accounts are prepared by means of allocating the data of the Company's accounts into operating segments, i.e. Natural Gas Supply, Electricity Supply and Other Operations. Regarding the accounts that cannot be allocated directly to an operation as they relate to either more than one operation or to the entire gas, electricity, and other operations (e.g., rentals, utility), the Principles and Regulations stated in the Decision 162/2019 (Government Gazette B '1730/2019) are applied.

General Principles and Methodology

The methodology applied under the preparation of the separate accounts includes the following steps:

a) Determining the distinct operations, into which the Company's accounts must be allocated based on the accounting treatment, i.e. Natural Gas Supply, Electricity Supply and Other Operations.

b) Collecting the accounts directly attributable to the separate operations and attaching of these accounts (DIRECT ALLOCATION). At this stage, Assets, Liabilities, Income and Expense Accounts are allocated to directly related operations. The Company also uses other variables for direct allocation of items to operations (cost / profit centers).

c) Collecting the accounts that cannot be directly related and allocated to separate operations.

d) Dividing the accounts that cannot be directly related and allocated to discrete operations according to the regulations rules (INDIRECT ALLOCAITON), so that they could be finally integrated with the operations account, arising from (b).

e) Preparation of separate income statements for the Company's discrete operations Natural Gas Supply, Electricity Supply and Other Operations.

f) Preparation of separate balance sheets of the discrete operations of the Horizontal Integrated Enterprise

The account refers to the balance presented per the Company's trial balance.

Methods of Allocation

Direct Allocation of the Accounts to the Relative Operations

Direct allocation is mainly based on the criterion of the use or the way of generating the particular account. The direct way of allocating an account to an operation concerns allocation without applying the intermediate method of allocation. The accounts directly related to an operation are directly and fully allocated to that operation.

In order to prepare the financial statements, the following actions are performed at least at the General Accounting level:

a) The cost/profit centers are recorded, in order to determine the limits and the relations between the Natural Gas Supply, Electricity Supply and Other Operations.

b) The sums of the cost/profit centers and accounts are reconciled with the Company's consolidated balance sheet.

c) The balance sheet accounts are codified and grouped into sections of the Balance Sheet and the Income Statements, guided by the Company's Financial Statements.

Under this unbundling, supporting documents and transactions that relate exclusively to one operation or report a separate amount per operation directly update the separate accounts per operation.

Indirect Allocation of the Accounts to the Relative Operations

The accounts that cannot be fully allocated to an operation are unbundled based on allocation keys recorded in Decision 162/2019 (Government Gazette B '1730/2019).

Allocation Keys (Indirect Allocation)

DEPA Commercial SA uses exclusively the following keys for the accounts that cannot be allocated directly to the distinct operations based on the guidelines recorded in Decision 162/2019 (Government Gazette B '1730/2019).

- (a) "Total Operation Directly Allocated Assets"
- (b) "Operation Turnover"
- (c) "Operation Personnel Fees and Expenses"
- (d) "Operation Results"

Verification of Regulatory Information

RAE can conduct extraordinary audits, in order to verify that the Horizontal Integrated Enterprise "DEPA Commercial SA" and/or the auditors cooperating with it, apply the provisions of Articles 141 and 89 of Law 4001/2011 regarding the obligation to keep separate Balance Sheet and Income Statement accounts and correctly apply the Principles and Regulations for allocation of Assets and Liabilities and Expenses and Revenues for the preparation of the above separate accounts, for each of the Company's operations.

Therefore, RAE is in position to access the accounts of every Horizontal Integrated Enterprise and is entitled to request that the auditors of this enterprise should provide additional explanations or clarifications regarding their reports, as well as additional financial information regarding the issues, included in these reports. For this purpose, the Companies take care to legally ensure this RAE potential in order to be able to perform its responsibilities smoothly in relation to the arising above obligations. The Principles and Regulations for allocation of Assets and Liabilities and Expenses and Revenues, which apply as above for the preparation of the separate accounts of the Company's Natural Gas Supply, Electricity Supply and Other Operations are Fixed and are amended following RAE decision, whenever deemed appropriate.

Publication of Unbundled Financial Statements

Within fifteen (15) working days from the approval of the financial statements by the General Meeting of its shareholders, the Company will disclose to RAE the annual financial statements, which include the unbundled financial statements together with the Independent Auditor's Report and, in line with the Principles and Regulations for Allocation, explanatory notes regarding the Principles and Regulations for allocation of Assets and Liabilities and Expenses and Revenues, Auditors' Reports.

Chairman of the BoD

Chief Executive Officer

Executive Director Coordinating Division Financial Activities Director Cost Accounting and Financial Statements

IOANNIS PAPADOPOULOS ID NUM. AK 005500 KONSTANTINOS D. XIFARAS ID NUM. AK 739332 MARIA FANTRIDAKI ID NUM. X 070908 FIRST CLASS LICENSE O.E.E. 750 LEONIDAS MOUZAKITIS ID NUM. AM 520882 FIRST CLASS LICENSE O.E.E. 14456