



HELLENIC GAS TRANSMISSION SYSTEM OPERATOR S.A.

357-359 MESOGEION AVE., CHALANDRI

General Register of Commerce No: 7483601000

Financial Statements for the year ended 31 December 2021

in accordance with the International Financial Reporting Standards (IFRS)

as adopted by the European Union

HELLENIC GAS TRANSMISSION SYSTEM OPERATOR
Financial Statements for the year ended 31 December 2021
(Amounts in Euro thousand)

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Statement of Comprehensive Income

<i>Amounts in thousand €</i>	<i>Notes</i>	<i>1/1/2021 - 31/12/2021</i>	<i>1/1/2020 - 31/12/2020</i>
Revenue	3	202.697	230.961
Cost of Sales	4	(117.605)	(110.086)
Gross profit		85.092	120.875
Other Income	5	11.857	12.390
		96.949	133.265
Administrative expenses	4	(18.573)	(20.830)
Distribution expenses	4	(945)	(800)
Other Expenses	4	(2.181)	(5.537)
Amortisation of fixed asset grants	19	11.159	11.253
Operating profit		86.410	117.350
Finance costs – net	6	(6.803)	(7.312)
Profit before income tax		79.607	110.039
Income tax expense	12	(16.472)	(27.276)
Profit for the year		63.135	82.763
Other comprehensive income			
Actuarial (loss)/profit on retirement benefit obligations	21	(282)	(232)
Deferred tax relating to these items		63	56
Other comprehensive (loss)/income for the year, net of tax		(219)	(176)
Total comprehensive income for the year		62.916	82.587

The notes on pages **7 to 47** are an integral part of these financial statements.

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Statement of Financial Position

<i>Amounts in thousand €</i>	<i>Notes</i>	<i>31/12/2021</i>	<i>31/12/2020</i>
ASSETS			
Non-current assets			
Tangible assets	7	1.136.216	1.162.456
Intangible assets	8	13.581	14.164
Investments in associates	9	14.938	355
Financial assets at fair value through profit or loss	10	350	350
Other non-current assets	11	320	266
Total non-current assets		1.165.404	1.177.591
Current assets			
Inventories	13	20.395	17.199
Trade and other receivables	14	60.310	47.900
Income tax asset	12	2.304	0
Cash and cash equivalents	15	102.724	163.876
Total current assets		185.733	228.975
TOTAL ASSETS		1.351.137	1.406.566
EQUITY AND LIABILITIES			
Equity			
Share capital	16	564.069	564.069
Reserves	16	41.111	37.960
Retained earnings		222.250	272.377
Total equity		827.430	874.406
Non-current liabilities			
Employee benefit obligations	21	3.993	3.980
Borrowings	18	126.042	140.320
Lease liabilities	20	5.660	5.044
Provisions	25.6	18.860	20.741
State grants	19	219.086	229.833
Other non-current liabilities	27	145	145
Deferred tax liabilities	12	26.754	21.359
Total non-current liabilities		400.540	421.423
Current liabilities			
Trade and other payables	22	95.065	77.451
Borrowings	18	14.278	15.362
Lease liabilities	20	1.009	1.235
State grants	19	11.205	10.990
Current income tax liabilities	12	0	2.414
Other taxes payable	23	1.609	3.284
Total current liabilities		123.167	110.736
Total Liabilities		523.707	532.160
TOTAL EQUITY AND LIABILITIES		1.351.137	1.406.566

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Statement of Changes in Equity

<i>Amounts in thousand €</i>	Share capital	Statutory reserves	Other reserves	Retained earnings	Total equity
Balance at 1 January 2020	639.051	33.330	449	193.971	866.801
Changes of share capital	(74.982)				(74.982)
Profit for the year	-	-	-	82.763	82.763
Other comprehensive income	-	-	-	(176)	(176)
Total comprehensive income for the year	-	-	-	82.587	82.587
Transfer to statutory reserve	-	4.182	-	(4.182)	-
Balance at 31 December 2020	564.069	37.512	449	272.377	874.406
Balance at 1 January 2021	564.069	37.512	449	272.377	874.406
Change in accounting policy (Notes 2.4 & 21)				107	107
Restated total equity at 1 January 2021	564.069	37.512	449	272.483	874.513
Changes of share capital	-				-
Profit for the year	-	-	-	63.135	63.135
Other comprehensive income	-	-	-	(219)	(219)
Total comprehensive income for the year	-	-	-	62.916	62.916
Transfer to statutory reserve	-	3.150	-	(3.150)	-
Transactions with owners in their capacity as owners:					
Dividends paid (Note 17)	-	-	-	(110.000)	(110.000)
Balance at 31 December 2021	564.069	40.662	449	222.250	827.430

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Cash Flow Statement

<i>Amounts in thousand €</i>	<i>Notes</i>	<i>1/1/2021 - 31/12/2021</i>	<i>1/1/2020 - 31/12/2020</i>
Cash flows from operating activities			
Profit/(Loss) before income tax		79.607	110.039
<u>Adjustments for:</u>			
Depreciation and amortization	7 & 8	57.655	57.576
Provisions		(6.177)	2.268
Amortization of grants for investments in fixed assets	19	(11.159)	(11.253)
(Gains) / Losses from disposal of assets		5	822
Finance costs – net	6	6.803	7.312
		126.734	166.764
Change in operating assets and liabilities:			
(Increase) / Decrease in inventories		(3.196)	1.429
(Increase) / Decrease in trade and other receivables		(11.976)	1.923
Increase / (Decrease) in trade and other payables		19.741	7.275
Cash (used in)/generated from operations		131.303	177.391
Income taxes paid		(15.754)	(25.054)
Finance costs paid		(7.006)	(7.798)
Net cash inflows from operating activities		108.544	144.539
Cash flows from investing activities			
Purchases of tangible assets	7	(28.884)	(25.714)
Purchases of intangible assets	8	(329)	(1.698)
Acquisition of investment in an associate		(14.583)	0
Proceeds from grants for investments in fixed assets	19	627	4.788
Interest received and investment income		68	334
Net cash (outflows) from investing activity		(43.101)	(22.290)
Cash flows from financing activities			
Receipts (payments) from increase (decrease of share capital)		0	(74.982)
Repayments of borrowings		(15.362)	(18.896)
Repayment of lease liabilities		(1.233)	(1.404)
Dividends paid	17	(110.000)	0
Net cash (outflows) from financing activities		(126.595)	(95.282)
Net (decrease) in cash and cash equivalents		(61.152)	26.966
Cash and cash equivalents at the beginning of year		163.876	136.910
Cash and cash equivalents at the end of year		102.724	163.876

The notes on pages **7 to 47** are an integral part of these financial statements.

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Notes to the Financial Statements

1. Establishment and activities

1.1. General information

HELLENIC GAS TRANSMISSION SYSTEM OPERATOR (the "Company" or "DESFA") was founded in Athens in 2007 and has its registered office at 357-359 Mesogeion Avenue, in the municipality of Chalandri, Prefecture of Attica, Greece. It was the result of the spin-off of the gas branch of company "DEPA S.A." on 30 June 2006, when the company drafted its Pre-spin off Balance Sheet, in accordance with the provisions of Laws 2166/1993 and 3428/2005. The term of the Company has been set at ninety-nine (99) years from the date of registration in the Registry of Sociétés Anonymes and may be extended by virtue of a resolution of the General Meeting of Shareholders.

1.2. Scope of activity

The company engages in the operation, maintenance, management, exploitation and development of the National Gas System (ESFA) in Greece, as defined by Article 6 of Law 3428/2005, including its connections, so that the ESFA is cost-effective, technically perfect and complete, as well as capable of meeting the needs of users, as defined in Article 2(31) of Law 3428/2005, for gas in a safe, adequate and cost-effective way.

2. Summary of significant accounting policies

2.1. Basis of preparation

These financial statements for the year ended 31 December 2021 have been prepared in accordance with International Financial Reporting Standards ("IFRS"), as issued by the International Accounting Standards Board ("IASB") and their interpretations as issued by the International Financial Reporting Interpretations Committee ("IFRIC") of IASB, as adopted by the European Union.

The financial statements have been prepared under the historical cost convention as modified by the revaluation of equity investments at fair value through profit or loss, in accordance with the going concern basis of accounting.

The financial statements for the year ended 31 December 2021 were approved for issuance by the Board of Directors on 06.05.2022 and are subject to the final approval of the General Meeting of Shareholders.

The financial statements of the Company are included in the consolidated financial statements of its parent company, Senfluga Energy Infrastructure Holdings S.A..

2.2. Implications of COVID-19 on the Company's business

The COVID-19 outbreak has developed vastly in 2021. Measures taken by various governments to contain the virus have negatively affected economic activity. At this stage, the impact on the Company's business and results is limited.

In order to deal with the impact of these circumstances the Company has taken specific measures to minimize disruption of operation while safeguarding the safety of its people: application of segregation of shifts, physical distance of employees and avoidance of any gathering, use of protective devices (masks, gloves, etc.), enhanced cleaning and disinfection, home working where applicable, mobile work force for technicians, restricted access to premises and plants (fever measurements, protective devices, segregated points for delivery of materials and mail, etc.).

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Notes to the Financial Statements (continued)

At the same time, the Company possesses the required liquidity to fulfill its obligations and finance its ongoing operations. Whilst uncertain, management does not believe, however, that the impact of the COVID-19 virus would have a material effect on the Company's financial condition or liquidity.

2.3. Presentation of financial statements

The financial statements are presented in Euro, which is the group's functional and presentation currency.

All amounts are presented in Euro thousands, unless stated otherwise.

2.4. New standards, interpretations of and amendments to existing standards

Certain new standards, amendments to standards and interpretations have been issued that are mandatory for periods beginning on or after 1 January 2021. The Group's evaluation of the effect of these new standards, amendments to standards and interpretations is as follows:

Standards and Interpretations effective for the current financial year

IFRS 16 (Amendment) 'Covid-19-Related Rent Concessions'

The amendment provides lessees (but not lessors) with relief in the form of an optional exemption from assessing whether a rent concession related to COVID-19 is a lease modification. Lessees can elect to account for rent concessions in the same way as they would for changes which are not considered lease modifications.

IFRS 4 (Amendment) 'Extension of the Temporary Exemption from Applying IFRS 9'

The amendment changes the fixed expiry date for the temporary exemption in IFRS 4 'Insurance Contracts' from applying IFRS 9 'Financial Instruments', so that entities would be required to apply IFRS 9 for annual periods beginning on or after 1 January 2023.

IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16 (Amendments) 'Interest rate benchmark reform – Phase 2'

The amendments complement those issued in 2019 and focus on the effects on financial statements when a company replaces the old interest rate benchmark with an alternative benchmark rate as a result of the reform. More specifically, the amendments relate to how a company will account for changes in the contractual cash flows of financial instruments, how it will account for the change in its hedging relationships and the information it should disclose.

Standards and Interpretations effective for subsequent periods

IFRS 16 (Amendment) 'Covid-19-Related Rent Concessions' (effective for annual periods beginning on or after 1 April 2021)

The amendment extends the application period of the practical expedient in relation to rent concessions by one year to cover rental concessions that reduce leases due only on or before 30 June 2022.

IFRS 17 'Insurance contracts' and Amendments to IFRS 17 (effective for annual periods beginning on or after 1 January 2023)

IFRS 17 has been issued in May 2017 and, along with the Amendments to IFRS 17 issued in June 2020, supersedes IFRS 4. IFRS 17 establishes principles for the recognition, measurement, presentation and disclosure of insurance contracts within the scope of the Standard and its objective is to ensure that an entity provides relevant information that faithfully represents those contracts. The new standard solves the comparison problems created

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Notes to the Financial Statements (continued)

by IFRS 4 by requiring all insurance contracts to be accounted for in a consistent manner. Insurance obligations will be accounted for using current values instead of historical cost.

IAS 16 (Amendment) 'Property, Plant and Equipment – Proceeds before Intended Use' (effective for annual periods beginning on or after 1 January 2022)

The amendment prohibits an entity from deducting from the cost of an item of PP&E any proceeds received from selling items produced while the entity is preparing the asset for its intended use. It also requires entities to separately disclose the amounts of proceeds and costs relating to such items produced that are not an output of the entity's ordinary activities.

IAS 37 (Amendment) 'Onerous Contracts – Cost of Fulfilling a Contract' (effective for annual periods beginning on or after 1 January 2022)

The amendment clarifies that 'costs to fulfil a contract' comprise the incremental costs of fulfilling that contract and an allocation of other costs that relate directly to fulfilling contracts. The amendment also clarifies that, before a separate provision for an onerous contract is established, an entity recognizes any impairment loss that has occurred on assets used in fulfilling the contract, rather than on assets dedicated to that contract.

IFRS 3 (Amendment) 'Reference to the Conceptual Framework' (effective for annual periods beginning on or after 1 January 2022)

The amendment updated the standard to refer to the 2018 Conceptual Framework for Financial Reporting, in order to determine what constitutes an asset or a liability in a business combination. In addition, an exception was added for some types of liabilities and contingent liabilities acquired in a business combination. Finally, it is clarified that the acquirer should not recognize contingent assets, as defined in IAS 37, at the acquisition date.

IAS 1 (Amendment) 'Classification of liabilities as current or non-current' (effective for annual periods beginning on or after 1 January 2023)

The amendment clarifies that liabilities are classified as either current or non-current depending on the rights that exist at the end of the reporting period. Classification is unaffected by the expectations of the entity or events after the reporting date. The amendment also clarifies what IAS 1 means when it refers to the 'settlement' of a liability. The amendment has not yet been endorsed by the EU.

IAS 1 (Amendments) 'Presentation of Financial Statements' and IFRS Practice Statement 2 'Disclosure of Accounting policies' (effective for annual periods beginning on or after 1 January 2023)

The amendments require companies to disclose their material accounting policy information and provide guidance on how to apply the concept of materiality to accounting policy disclosures. The amendments have not yet been endorsed by the EU.

IAS 8 (Amendments) 'Accounting policies, Changes in Accounting Estimates and Errors: Definition of Accounting Estimates' (effective for annual periods beginning on or after 1 January 2023)

The amendments clarify how companies should distinguish changes in accounting policies from changes in accounting estimates. The amendments have not yet been endorsed by the EU.

IAS 12 (Amendments) 'Deferred tax related to Assets and Liabilities arising from a Single Transaction' (effective for annual periods beginning on or after 1 January 2023)

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The amendments require companies to recognize deferred tax on transactions that, on initial recognition, give rise to equal amounts of taxable and deductible temporary differences. This will typically apply to transactions such as leases for the lessee and decommissioning obligations. The amendments have not yet been endorsed by the EU.

IFRS 17 (Amendment) 'Initial Application of IFRS 17 and IFRS 9 – Comparative Information' (effective for annual periods beginning on or after 1 January 2023)

The amendment is a transition option relating to comparative information about financial assets presented on initial application of IFRS 17. The amendment is aimed at helping entities to avoid temporary accounting mismatches between financial assets and insurance contract liabilities, and therefore improve the usefulness of comparative information for users of financial statements. The amendment has not yet been endorsed by the EU.

Annual Improvements to IFRS Standards 2018–2020 (effective for annual periods beginning on or after 1 January 2022) IFRS 9 'Financial instruments'

The amendment addresses which fees should be included in the 10% test for derecognition of financial liabilities. Costs or fees could be paid to either third parties or the lender. Under the amendment, costs or fees paid to third parties will not be included in the 10% test.

IFRS 16 'Leases'

The amendment removed the illustration of payments from the lessor relating to leasehold improvements in Illustrative Example 13 of the standard in order to remove any potential confusion about the treatment of lease incentives.

IAS 41 'Agriculture'

The amendment has removed the requirement for entities to exclude cash flows for taxation when measuring fair value under IAS 41

Effect of adjustment due to the change in International Accounting Standard (IAS) 19 "Employee benefits"

The International Financial Reporting Interpretations Committee (IFRIC) decision on Attributing Benefit to Periods of Service under a defined benefit plan, in accordance with International Accounting Standard (IAS) 19 "Employee Benefits". The International Financial Reporting Interpretations Committee issued the final agenda decision in May 2021, under the title "Attributing Benefits to Periods of Service" (IAS 19), which includes explanatory material regarding the way of distribution of benefits in periods of service following a specific defined benefit plan proportionate to that defined in Article 8 of Law 3198/1955 regarding provision of compensation due to retirement (the "Labor Law Defined Benefit Plan").

This decision differentiates the way in which the basic principles and regulations of IAS 19 have been applied in Greece in the previous years, and therefore, according to what is defined in the "IASB Due Process Handbook (par 8.6)", entities that prepare their financial statements in accordance with IFRS are required to amend their Accounting Policy accordingly.

For DESFA, the total effect after tax of the implementation of this new IFRIC decision on 1.1.2021 amounted to 107 thousand € which was considered as immaterial. Based on that fact and according to the provisions of IAS 8

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(par. 8, 16b, 23-29), all related adjustments for the correction of the Financial Statements of 2021, were performed for every affected specific item of financial statements on 1.1.2021, as well as, at the same date the accumulated effect of the implementation was directly recognized in the Statement of Changes in Equity (as "Change of accounting policy"). Lastly, the effect for the item employee benefit obligation is amounted to 136 thousand € (note 21).

2.5. Functional and Presentation Currency, and Foreign Exchange Conversion

The Company keeps its accounting books in Euro, which is the Company's functional and presentation currency. Transactions that are carried out in a foreign currency are converted to Euro using the official exchange rate that applies on the day each transaction is carried out. On the financial statement preparation date, the assets and liabilities amounts expressed in other currencies are converted to Euro so as to reflect current exchange rates. The profit and loss arising from foreign currency transactions and the end-of-period measurement of foreign currency amounts are recorded in the statement of comprehensive income.

2.6. Tangible fixed assets

Tangible assets are presented in the financial statements at their acquisition cost. The initial cost of acquisition is subsequently reduced by: (a) accumulated depreciation, and (b) any impairment loss. The initial fixed asset acquisition cost includes the purchase price, including import duties and non-refundable purchase taxes and compensation for land expropriation, as well as all necessary expenses to prepare the fixed assets for their intended use. Subsequent expenditures incurred in connection with tangible assets are capitalized when the future economic benefits expected to flow from the use of the affected assets increase. All other expenditures relating to the repair, maintenance, etc. of fixed assets are recorded in the expenses of the fiscal year when they were incurred. Upon withdrawal or sale of fixed assets, the relevant cost and accumulated depreciation is deleted from the corresponding accounts in the withdrawal or sale period, and the relevant profits or losses are recognized in profit or loss. Depreciation is charged to the statement of comprehensive income using the straight-line method over the useful lives of fixed assets. Land is not depreciated. The estimated useful economic life per category of fixed asset is:

Buildings and installations	1 - 20	years
Plant, machinery and equipment	6 - 40	years
Transportation equipment	5 - 7	years
Furniture and fixtures	3 - 7	years

The residual values and useful lives of tangible fixed assets are reviewed at each reporting date and if needed appropriate revision and adjustment is recorded.

2.7. Intangible fixed assets

2.7.1. Easements

Easements are recognized in intangible assets at the amounts paid by the Company to beneficiaries as right of way for the installation of the gas system. Amortization is charged to profit or loss using the straight-line method over the useful lives of the assets. Their estimated useful economic life is 40 years as the relevant expenditure is considered to be consequential to the gas pipeline installation investment, which has the same useful economic life.

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2.7.2. Software

Software is recognized as an intangible asset at acquisition cost. The expenses incurred to increase or expand the performance of software beyond its initial specifications are recognized as capital expenses added to the initial software cost. Amortization of software is charged to profit or loss using the straight-line method over the useful economic life of such software, which is estimated to be 5 years.

2.8. Investments in associates

Associates are entities over which the Company has significant influence but not control, generally accompanying a shareholding of between 20% and 50% of the voting rights. Investments in associates are measured at cost less impairment. For the impairment assessment refer to Note 2.9.

DESFA is not obliged to prepare consolidated financial statements as its financial statements are included in the consolidated financial statements of its immediate parent company, Senfluga Energy Infrastructure Holdings S.A.

2.9. Impairment of non-financial assets

Assets that are subject to depreciation/amortization are reviewed for impairment at each balance sheet date and are tested for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognized, as expense immediately, for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use. Fair value less costs to sell is the price that would be received to sell an asset in an orderly transaction between market participants at the measurement date, less the costs of disposal. Value in use is the present value of the future cash flows expected to be derived from an asset. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset for which the estimates of future cash flows have not been adjusted. For the purposes of assessing impairment assets are allocated to the smallest group of cash-generating units for which a reasonable and consistent allocation basis can be identified. Prior impairments of non-financial assets (other than goodwill) are reviewed for possible reversal at each reporting date. Where an impairment loss subsequently reverses, the carrying amount of the asset (or cash-generating unit) is increased to the revised estimate of its recoverable amount, but so that the increased carrying amount does not exceed the carrying amount that would have been determined had no impairment loss been recognized for the asset (or cash-generating unit) in prior years. A reversal of an impairment loss is recognized immediately in profit and loss to the extent that it eliminates the impairment loss which has been recognized for the asset in prior years. Any increase in excess of this amount is treated as a revaluation increase.

2.10. Financial instruments

A financial instrument is any contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

The Company has the following financial assets as at 31 December 2021: Trade & Other receivables, Cash and cash equivalents and other non-current assets, of which are categorized to be measured at amortised cost as well as an equity investment which is classified within financial assets at fair value through profit or loss in the statement of financial position.

Notes to the Financial Statements (continued)

(i) Initial recognition and subsequent measurement of financial assets

The Company classifies its financial assets, at initial recognition in the following measurement categories:

- Financial assets at fair value through profit or loss ("FVPL");
- Financial assets at amortized cost.

The classification of financial assets at initial recognition depends on the Company's business model for managing the Company's financial assets and the contractual terms of the cash flows.

With the exception of trade receivables, the Company initially measures a financial asset at its fair value plus, in the case of a financial asset not at fair value through profit or loss, transaction costs. Trade receivables are initially measured at the transaction price determined under IFRS 15 "Revenue from contracts with customers". In order for a financial asset to be classified and measured at amortized cost or fair value through other comprehensive income, it needs to give rise to cash flows that are 'solely payments of principal and interest (SPPI)' on the principal amount outstanding. This assessment is referred to as the SPPI criterion and is performed at an instrument level.

For the purpose of subsequent measurement, financial assets are classified in three categories:

- a) Financial assets at amortized cost: Assets that are held for collection of contractual cash flows where those cash flows represent solely payments of principal and interest are measured at amortized cost. Interest income from these financial assets is included in finance income using the effective interest rate method. The effective interest method is a method of calculating the amortized cost of a financial liability and of allocating interest expense over the relevant period. The effective interest rate is the rate that exactly discounts estimated future cash payments (including all fees and points paid or received that form an integral part of the effective interest rate, transaction costs and other premiums or discounts) through the expected life of the financial liability, or (where appropriate) a shorter period, to the amortized cost of a financial liability. Any gain or loss arising on derecognition of an asset is recognized directly in profit or loss, together with any foreign exchange gains/losses. Impairment losses are presented in the separate line item "Net gains/(losses) on impairment of financial assets" in the income statement.
- b) Financial assets at fair value through other comprehensive income: Assets that are held for collection of contractual cash flows and for selling the financial assets, where the assets' cash flows represent solely payments of principal and interest, are measured at FVOCI. Movements in the carrying amount are taken through OCI, except for the recognition of impairment gains or losses, interest revenue and foreign exchange gains and losses which are recognized in profit or loss. When the financial asset is derecognized, the cumulative gain or loss previously recognized in OCI is reclassified from equity to profit or loss and recognized in Other gains/losses. Interest income from these financial assets is included in finance income using the effective interest rate method. Impairment losses are presented in the separate line item "Net gains/(losses) on impairment of financial assets" in the income statement.
- c) Financial assets at fair value through profit or loss: Assets that do not meet the criteria for amortised cost or FVOCI are measured at FVPL. Gain or loss is recognised in profit or loss in "Other gains/(losses)" in the period in which it arises.

The Company holds no assets at fair value through other comprehensive income as at 31 December 2021.

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Financial assets at amortized cost are subsequently measured using the effective interest (EIR) method and are subject to impairment. Gains and losses are recognized in profit or loss when the asset is derecognized, modified or impaired. This category includes all financial assets of the Company, except for the investments are measured at fair value through profit or loss (Financial assets at fair value through profit or loss).

For assets measured at fair value, gains and losses will be recorded in profit or loss. Gains or losses arising from changes in the fair value are recognized in the income statement within "Gains / (losses) from investments and other financial assets - Impairment".

(ii) Impairment

The Company assesses at each reporting date, whether a financial asset or group of financial assets is impaired and recognizes, if necessary, an allowance for expected credit losses (ECLs) for all debt instruments not held at fair value through profit or loss. ECLs are based on the difference between the contractual cash flows due in accordance with the contract and all the cash flows that the Company expects to receive, discounted at an approximation of the original effective interest rate.

ECLs are recognized in two stages. For credit exposures for which there has not been a significant increase in credit risk since initial recognition, ECLs are provided for credit losses that result from default events that are possible within the next 12 months (a 12-month ECL). For those credit exposures for which there has been a significant increase in credit risk since initial recognition, a loss allowance is required for credit losses expected over the remaining life of the exposure, irrespective of the timing of the default (a lifetime ECL).

For trade receivables, the Company applies the simplified approach permitted by IFRS 9. Based on this approach, the Company recognizes the credit losses that are expected throughout the lifetime of trade receivables (expected lifetime losses). Further details on trade receivables are disclosed in Note 14.

For all other financial assets at amortized cost, the general approach is applied. These assets are considered to have low credit risk and any loss allowance is therefore limited to 12 months' expected losses.

(iii) Derecognition

Financial assets are derecognized when:

- the rights to receive cash flows from the financial asset have expired;
- The Company retains the right to receive cash flows from the asset, but has assumed an obligation to pay them in full without material delay to a third party under a "pass-through" arrangement; or
- The rights to receive cash flows from the financial asset have been transferred and either the Company (a) has transferred substantially all the risks and rewards of the asset or (b) has neither transferred nor retained substantially all the risks and rewards of the asset, but has transferred control of the asset.

When the Company has transferred its rights to receive cash flows from an asset or has entered into a pass-through arrangement, it evaluates if, and to what extent, it has retained the risks and rewards of ownership.

When it has neither transferred nor retained substantially all of the risks and rewards of the asset, nor transferred control of the asset, the Company continues to recognize the transferred asset to the extent of its continuing involvement. In that case, the Company also recognizes an associated liability. The transferred asset and the associated liability are measured on a basis that reflects the rights and obligations that the Company has retained.

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Continuing involvement that takes the form of a guarantee over the transferred asset is measured at the lower of the original carrying amount of the asset and the maximum amount of consideration that the Company could be required to repay.

Initial recognition and subsequent measurement of financial liabilities

All financial liabilities are recognized initially at fair value and, in the case of loans and borrowings and payables, net of directly attributable transaction costs. For the purpose of subsequent measurement, financial liabilities are classified as financial liabilities at amortized cost or financial liabilities at fair value through profit or loss.

Derecognition of financial liabilities

A financial liability is derecognized when the obligation under the liability is discharged or cancelled or expires. When an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as a derecognition of the original liability and a recognition of a new liability. The difference in the respective carrying amounts is recognized in the income statement.

2.11. Offsetting financial instruments

Financial assets and liabilities are offset and the net amount reported in the statement of financial position only when there is a legally enforceable right to offset the recognized amounts and there is an intention to settle on a net basis or realize the asset and settle the liability simultaneously. The legally enforceable right must not be contingent on future events and must be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the company or the counterparty.

2.12. Inventories

Inventories are stated at the lower of acquisition cost and net realizable value. The cost of inventories is determined using the weighted average cost method and includes all the necessary expenses incurred for inventories to be taken to their placement location. The net realizable value of inventories is their estimated selling price during the normal operation of the Company minus the estimated necessary costs for sale thereof. On each reporting date, inventories that are obsolete, useless and with very low inventory turnover are tested for impairment. Provisions are formed for the reduction of the acquisition value of inventories in net realizable value, which are registered in profit or loss during the period where such reductions arise. The provisions are revised at each reporting period.

2.13. Cash and cash equivalents

Cash and cash equivalents include cash, sight deposits, short-term high liquidity investments of up to three months.

2.14. Share Capital

Ordinary shares are classified in equity. The cost directly attributable to issuing new shares is recognized directly in equity as a reduction of share premium.

2.15. Borrowings

All loans and borrowings are initially classified at cost being the fair value of the proceeds received net of issue costs associated with the borrowing. After initial recognition, borrowings are measured at amortized cost using the effective interest method. Any difference between the amount received (net of acquisition cost) and the amount to be repaid is recognized in profit and loss over the loan period.

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2.16. Leases

The Company assesses at contract inception whether a contract is, or contains, a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. The Company acts as a lessee.

The Company recognizes lease liabilities to make lease payments and right-of-use assets representing the right to use the underlying assets in accordance with IFRS 16.

i. Right-of-use assets

The Company recognizes right-of-use assets at the commencement date of the lease (i.e., the date the underlying asset is available for use). Right-of-use assets are measured at cost, less any accumulated depreciation and impairment losses and adjusted for any remeasurement of lease liabilities. The cost of right-of-use assets includes the amount of lease liabilities recognized, initial direct costs incurred, and lease payments made at or before the commencement date less any lease incentives received. Right-of-use assets are depreciated on a straight-line basis over the shorter of the lease term and the estimated useful life of the assets. If ownership of the leased asset is transferred to the Company at the end of the lease term or its cost reflects the exercise of a purchase option, depreciation is calculated using the estimated useful life of the asset.

The Company has lease contracts for buildings, vehicles and other equipment used in their operations. The lease contracts may contain both lease and non-lease components.

ii. Lease liabilities

At the commencement date of the lease, the Company recognizes lease liabilities measured at the present value of lease payments to be made over the lease term. The lease payments include fixed payments (including in-substance fixed payments) less any lease incentives receivable, variable lease payments that depend on an index or a rate, and amounts expected to be paid under residual value guarantees. The lease payments also include the exercise price of a purchase option reasonably certain to be exercised by the Company and payments of penalties for terminating the lease, if the lease term reflects the option to terminate. Variable lease payments that do not depend on an index or a rate are recognized as expenses in the period in which the event or condition that triggers the payment occurs. In calculating the present value of lease payments, the Company uses the Company's incremental borrowing rate because the interest rate implicit in the lease is not readily determinable.

After the commencement date, the amount of lease liabilities is increased to reflect the accretion of interest and reduced through the lease payments made. In addition, the carrying amount of lease liabilities is remeasured if there is a reassessment or modification of the lease contract.

Details for the Company's leases are included in Note 7.

2.17. Income tax (current and deferred)

The income tax for the fiscal year includes current and deferred taxes. Current and deferred income taxes are calculated based on the relevant amounts reflected in the financial statements, in accordance with the tax laws applicable in Greece. Current income tax refers to tax on the taxable profits of the company as reformed in accordance with the requirements of the tax law and calculated on the basis of the applicable tax rate.

Deferred tax is determined using the liability method for all the temporary tax differences, as at the reporting date, between the tax basis and book value of the assets and liabilities. The expected tax effects of the temporary tax differences are determined and presented either as deferred tax liabilities or as deferred tax assets.

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Deferred tax assets are recognized for all tax-deductible temporary differences and tax losses carried forward to the extent that it is probable that taxable profit will be available against which the tax-deductible temporary difference can be used, based on the estimated future performance of the Company.

The book value of the deferred tax assets is reviewed at each Financial Position date and is reduced to the extent that taxable profits will not be available against which a part or the total of the deferred tax assets can be used.

Current Income tax assets and liabilities for the current and previous fiscal years are measured at the amount expected to be paid to the tax authorities (or recovered from them), using tax rates (and tax laws) that have been enacted by the reporting date.

2.18. Dividends

Dividends are recognized as a liability at the time of approval by the General Meeting of Shareholders.

2.19. Defined Benefits Obligation

The Company contributes to both defined benefit and defined contribution plans. The liability in respect of defined benefit pension or retirement plans is the present value of the defined benefit obligation at the balance sheet date. Independent actuaries using the projected unit credit method calculate the defined benefit obligation annually.

The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of high-quality corporate bonds that are denominated in the currency in which the benefits will be paid, and that have terms approximating to the terms of the related obligation.

The interest cost is calculated by applying the discount rate to the balance of the defined benefit obligation. This cost is included in employee benefit expense in the statement of comprehensive income.

Actuarial gains and losses arising from experience adjustments and changes in actuarial assumptions are charged or credited to equity in other comprehensive income in the period in which they arise and they are included in other reserves in the statement of changes in equity and in the balance sheet.

Changes in the present value of the defined benefit obligation resulting from plan amendments or curtailments are recognized immediately in profit or loss as past service costs.

For defined contribution plans, the Company pays contributions to publicly or privately administered pension insurance plans on a mandatory, contractual or voluntary basis. The Company has no further payment obligations once the contributions have been paid. The contributions are recognized as employee benefit expense when they are due. Prepaid contributions are recognized as an asset to the extent that a cash refund or a reduction in the future payments is available.

2.20. Revenue from contracts with customers

The Company recognizes revenue related to the provision of services at a price that reflects the consideration it expects to be entitled to exchange goods or services in accordance with IFRS 15. It examines in detail the terms of the contract with the client as well as all relevant facts and circumstances related to the transfer of goods or services under the five-step model-framework provided. Revenue is recognized at the time that control of the goods or services is transferred to the customers, which is deemed to coincide with the time of satisfaction of contract obligations. The recording of revenue from contracts with customers is based on the following five steps: (i) identification of the contract with the customer; (ii) identification of the performance obligation, represented by the contractual promised to transfer goods and/or services to a customer; (iii) determination of the transaction price;

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(iv) allocation of the transaction price to the performance obligations identified on the basis of the stand-alone sales price of each good or service; (v) recording of the revenue when the related performance obligation has been satisfied, or at the time of transfer to the customer of the good or service promised; the transfer will be considered as made when the customer obtains control over the goods or services, which may take place over time or at a specific point in time.

As regards the activities carried out by the Company, revenue is generally recognized as follows:

Regulated services

Transmission of natural gas Revenue from the transmission of natural gas is recognized as the service is provided based on: a) the amount of transmission capacity booked by each user (customer) via his approved booking applications and b) the quantity (in energy units) of natural gas transmitted for each user (customer), during the month in question.

According to the article 4 of the Standard Contract Framework Agreement the Transmission User must pay a monthly fee to the Operator for the provision of the services agreed in the Agreement and in the Approved Application by the latter. The Fee is calculated and invoiced pursuant to the provisions of the Network Code, the Tariff Regulation, the NNGS Usage Tariff and any relevant delegated acts. The Transmission User is been invoiced on a monthly basis.

Use of LNG services

Revenue from the use of LNG services is recognized as the service is provided based on: a) the amount of regasification capacity booked by each user (customer) via his approved booking applications and b) the quantity (in energy units) of liquefied natural gas regasified for every user (customer), during the month in question.

According to the article 4 of the LNG Contract Framework Agreement the LNG User must pay a monthly fee to the Operator for the provision of the services agreed in the Agreement and each Approved LNG Application by the latter. The Fee is calculated and invoiced pursuant to the provisions of the Network Code, the Tariff Regulation, the Usage Tariff of the NNGS and the relevant delegated acts. The LNG User is been invoiced monthly.

Sales of balancing and operating gas

The Company ensures in any case the balance between Natural Gas Deliveries and Receptions in the National Natural Gas Transmission System (NNGTS) by the Transmission Users (Gas Balancing), taking into account the losses and stored quantities of Natural Gas on the Transmission System, aiming to the reliable, secure and effective operation thereof. The revenue from sales and operating gas is recognized over the period that the service is provided based on achieving the neutralization of the positive or negative balancing position of the Transmission Users in the system on a monthly basis. The Transmission User is invoiced on a monthly basis.

Security of supply duty

The Regulatory Authority for Energy (RAE) has set the maximum limit of the security of supply account, a unitary security of supply charge per category of natural gas customers and per standard power generation unit. According to the respective RAE decision, the Company maintains a separate interest-bearing account for inputs and outflows

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relating to security of supply matters, which will be refinanced by the interest accruing from the inventory of that account. The revenue deriving from the security of supply account is recognized on a monthly basis according to RAE decision (344/2014).

Non-regulated services

Supplementary Transmission Services

Supplementary Transmission Services include the services of metering systems calibration, the conduct of Dew Point Control Measurements and the provision of Equipped Working Space at the NGTS Entry Points. Revenue is recognized when the service is provided.

Other Non-Regulated Services

Other Non-Regulated Services include operation and maintenance services for distribution networks, CNG facilities, LNG facilities and LNG tankers, pipeline protection and other technical support services. Revenue is recognised when the service is provided.

2.21. Borrowing costs

Borrowing costs directly attributable to the construction of qualifying assets are added to the cost of those assets until such time as the assets are substantially ready for their intended use or sale. All other borrowing costs are recognized in profit or loss in the period in which they are incurred.

2.22. Provisions

Provisions are recognized when the Company has a present legal or constructive obligation as a result of past events, it is probable that an outflow of resources will be required to settle the obligation and the amount can be reliably estimated. Provisions are not recognized for future operating losses.

Where there are a number of similar obligations, the likelihood that an outflow will be required in settlement is determined by considering the class of obligations as a whole. A provision is recognized even if the likelihood of an outflow with respect to any one item included in the same class of obligations may be small. Provisions are measured at the present value of management's best estimate of the expenditure required to settle the present obligation at the end of the reporting period. The discount rate used to determine the present value is a pre-tax rate that reflects current market assessments of the time value of money and the risks specific to the liability. The increase in the provision due to the passage of time is recognized as interest expense.

2.23. Significant accounting judgments, estimates and assumptions

The preparation of the financial statements and the related notes requires the use of estimates and assumptions both in the measurement of certain assets and liabilities and in the valuation of contingent assets and liabilities. The actual results that arise upon the occurrence of the relevant events could thus differ from these estimates.

The estimates and assumptions used are revised on an ongoing basis, and the impact of any such revision is immediately recognized in statement of comprehensive income. The use of estimates is significant for the following items:

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Impairment testing of Property, Plant and Equipment: The Company's items of Property, Plant & Equipment are tested for impairment at the reporting date when indications of impairment exist. If any such indication exists, the recoverable amount of the items of Property, Plant and equipment is assessed by identifying those assets that form an independent Cash Generating Unit. The pipeline infrastructure of the Company has been assessed to be a single Cash Generating Unit for this purpose.

Future cash flows are projected based on the Company's business plan approved by management taking into consideration the approved regulatory income for the period covered by the plan. A terminal value is also calculated based on a reasonable perpetuity rate.

The key assumptions used by management in projecting cash flows for impairment testing on **31 December 2020** (which is the last performed by the Company) are the following:

- **Regulated revenue:** Management has based its analysis on the current regulatory framework, calculating recoverable differences based on the most recent updates and developments. Required revenue is estimated until 2039, including the new recoverable differences arising each year between the revenue from tariffs and the required revenue. Required revenue is calculated based on the prevailing regulatory WACC (from 7.44% in 2022, which is the end of current regulatory period, to 7.11%).
- **Capital expenditure:** The annual amounts are derived from the Company's 10 year Development Plan approved by RAE. Any capital expenditure relating to expansion has been excluded from the calculation, so that only maintenance capital expenditure is included.
- **Terminal value:** in order to capture the value of business beyond 2039 management estimated a Terminal Value based on a perpetuity formula. The perpetuity rate assumed was 1.5%.

Pre-tax discount rates: Reflect specific risks relating to the relevant segment and the country risk for Greece. The pre-tax discount rate range used in 2020 was 6,2% to 7,2%.

- **Depreciation and Amortization:** Depreciation of tangible assets and amortization of intangible assets with a finite useful life. The process of determining depreciation and amortization expense entails reviewing periodically the remaining useful lives of assets. Refer to Notes 2.6 and 2.7.
- **Provisions for contingencies:** There are pending disputed cases relating to the Company. Management assesses the outcome of these cases in order to recognize asset or liability. Where a negative outcome is possible, the Company forms the required provisions. Provisions, where required, are calculated on the basis of the current value of the estimates made by the management of the cost to be incurred for settling the expected liabilities as of the reporting period date. Refer to Note 25.6.
- **Impairment of trade and other receivables:** Estimation of expected credit loss for trade and other receivables. Refer to Note 25.2.

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- **Impairment of inventory:** Estimation of inventory devaluation. Refer to Note 2.12
- **Assessment of uncertain tax positions:** Determination of the provision for income taxes that the Company is subjected to requires significant judgment. There are some transactions and calculations for which the ultimate tax determination is uncertain. The Company recognizes liabilities for anticipated tax audits based on estimates of whether additional taxes will be due. Where the final tax outcome of these matters is different from the amounts that were initially recorded, such differences will impact the income tax and deferred tax provisions in the period in which such determination is made.

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3. Revenue

Revenue is analyzed as follows:

<i>Amounts in thousand €</i>	1/1/2021- 31/12/2021	1/1/2020- 31/12/2020
Transmission	153.379	168.525
Use of LNG services	29.887	39.121
Electricity	336	1.025
Additional services	106	1.490
Operation and Maintenance services	8.957	4.341
Non regulated sales	1.001	1.535
Sales of balancing and operating gas	6.720	7.314
Security of supply fees	2.312	7.610
Total	202.697	230.961

The increase in Operation and Maintenance services is mainly a result of the start of operations of the KIPIC project. The project was awarded to DESFA on 11.12.2020 for the operation and maintenance services of LNGI (Liquefied Natural Gas Import), the new liquefied natural gas terminal of the Kuwaiti state company, KIPIC. The contract has a duration of minimum five years. The high specialization and know-how of DESFA and of the shareholders Snam and Enagás, who will jointly perform the services, had a decisive contribution to the undertaking of the project. The experience gained by DESFA from managing the Greek transmission system and the LNG terminal in Revithoussa, also had a catalytic contribution to the undertaking of the project. The LNGI Terminal is one of the largest LNG storage and regasification stations in the world, with eight liquefied gas storage tanks, having capacity of 225.000m³ each. According to KIPIC, the purpose of the project is to serve the industrial consumers of natural gas, but also to meet the growing needs of the country for a cleaner fuel for the production of electric power.

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4. Expenses

Cost of sales

Cost of sales is analyzed as follows:

<i>Amounts in thousand €</i>	1/1/2021- 31/12/2021	1/1/2020- 31/12/2020
Personnel fees and expenses	14.288	12.570
Third party fees and expenses	7.943	7.590
Utilities and services	12.003	8.294
Taxes and duties expenses	7.692	13.563
Purchases of Natural Gas	15.031	7.402
Depreciation and amortization	56.622	56.596
Staff indemnity provision	63	250
Miscellaneous expenses	3.963	3.820
Total	117.605	110.086

Administrative expenses

Administrative expenses are analyzed as follows:

<i>Amounts in thousand €</i>	1/1/2021- 31/12/2021	1/1/2020- 31/12/2020
Personnel fees and expenses	10.744	9.488
Third party fees and expenses	3.649	6.862
Utilities and services	797	1.102
Taxes and duties expenses	118	58
Depreciation and amortization	969	932
Staff indemnity provision	24	177
Miscellaneous expenses	2.273	2.211
Total	18.573	20.830

Distribution expenses

Distribution expenses are analyzed as follows:

<i>Amounts in thousand €</i>	1/1/2021- 31/12/2021	1/1/2020- 31/12/2020
Personnel fees and expenses	62	17
Third party fees and expenses	208	273
Utilities and services	4	3
Taxes and duties expenses	57	27
Miscellaneous expenses	614	481
Total	945	800

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Other Expenses

Other Expenses are analyzed as follows:

<i>Amounts in thousand €</i>	1/1/2021- 31/12/2021	1/1/2020- 31/12/2020
Extraordinary and non-operating expenses	600	1
Extraordinary losses	5	282
Expenses from previous years	442	2.111
Staff retirement indemnities	601	692
Provisions for contingencies (Note 25.6)	533	2.451
Total	2.181	5.537

5. Other Income

Other Income consists of the following items:

<i>Amounts in thousand €</i>	1/1/2021- 31/12/2021	1/1/2020- 31/12/2020
Other Income from services provision	735	1.810
Rental income	3	3
Income from settlement of legal cases	1.881	2.627
Reversal of provision for security supply levy	3.158	4.802
Reversal of provisions for extraordinary contingencies	6.081	2.673
Reversal of provisions for impaired inventories	0	282
Reversal of provisions for doubtful claims	0	193
Total	11.857	12.390

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6. Finance costs – net and foreign exchange differences -net

The item is analyzed as follows:

<i>Amounts in thousand €</i>	1/1/2021 - 31/12/2021	1/1/2020 - 31/12/2020
Interest and other bank charges	6.660	7.409
Interest charge on leases	228	225
Total financial expenses	6.887	7.634
Interest and investment income	(85)	(322)
Total financial income	(85)	(322)
Net financial expenses / (income)	6.803	7.312

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7. Tangible assets

The Company's tangible assets are broken down as per following tables. No impairment has been considered necessary in 2021, and the analysis thereon from 2020 can be found under note 2.23. No securities have been provided to outside parties on owned assets. :

<i>Amounts in thousand €</i>	Land	Buildings	Machinery	Vehicles	Furniture, fittings and equipment	Assets under construction	Total
<u>Cost</u>							
Balance at 1 January 2020	7.984	121.133	1.894.783	2.667	43.866	30.518	2.100.952
Additions	-	959	1.125	50	744	23.845	26.723
Transfers	-	2.240	11.276	-	3.415	(16.932)	-
Disposals	-	-	-	-	-	(822)	(822)
Balance at 31 December 2020	7.984	124.332	1.907.185	2.717	48.025	36.609	2.126.852
<u>Accumulated depreciation</u>							
Balance at 1 January 2020	-	(80.740)	(785.488)	(1.853)	(39.705)	-	(907.786)
Depreciation for the year	-	(4.275)	(50.083)	(488)	(1.764)	-	(56.610)
Disposals	-	-	-	-	-	-	-
Balance at 31 December 2020	-	(85.016)	(835.570)	(2.341)	(41.469)	-	(964.397)
Net book amount at 31 December 2020	7.984	39.317	1.071.614	376	6.556	36.609	1.162.456

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<i>Amounts in thousand €</i>	Land	Buildings	Machinery	Vehicles	Furniture, fittings and equipment	Assets under construction	Total
<u>Cost</u>							
Balance at 1 January 2021	7.984	124.332	1.907.185	2.717	48.025	36.609	2.126.852
Additions	-	1.456	651	206	255	27.940	30.508
Transfers	226	835	19.173	0	4.338	(24.842)	(269)
Disposals	0	0	0	0	(5)	0	(5)
Balance at 31 December 2021	8.210	126.624	1.927.008	2.923	52.614	39.707	2.157.087
<u>Accumulated depreciation</u>							
Balance at 1 January 2021	-	(85.016)	(835.570)	(2.341)	(41.469)	-	(964.397)
Depreciation for the year	-	(4.199)	(49.264)	(305)	(2.706)	-	(56.474)
Disposals	-	-	-	-	-	-	-
Balance at 31 December 2021	-	(89.214)	(884.835)	(2.646)	(44.176)	-	(1.020.871)
Net book amount at 31 December 2021	8.210	37.410	1.042.174	277	8.438	39.707	1.136.216

Notes to the Financial Statements (continued)

Leases – Right-of-use assets

The right-of-use assets included in Property, plant and equipment have resulted from the application of IFRS 16 as from 1 January 2019 and are disclosed separately in the following table:

1/1-31/12/2020

Amounts in thousands €	Buildings	Vehicles	Furniture, fittings and equipment	Total
<u>Cost</u>				
Book value as at 1 January 2020	6.511	1.334	170	8.015
Additions	959	50	0	1.009
Total Cost as at 31/12/2020	7.470	1.384	170	9.024
<u>Depreciations</u>				
Book value as at 1 January 2020	(881)	(520)	(42)	(1.443)
Additions	(913)	(488)	(42)	(1.443)
Total depreciations as at 31/12/2020	(1.794)	(1.008)	(84)	(2.886)
Net book value as at 31/12/2020	5.676	376	86	6.138

1/1-31/12/2021

Amounts in thousands €	Buildings	Vehicles	Furniture, fittings and equipment	Total
<u>Cost</u>				
Book value as at 1 January 2021	7.470	1.384	170	9.024
Additions	1.456	168	-	1.624
Total Cost as at 31/12/2021	8.926	1.552	170	10.648
<u>Depreciations</u>				
Book value as at 1 January 2021	(1.794)	(1.008)	(84)	(2.886)
Additions	(946)	(304)	(42)	(1.293)
Total depreciations as at 31/12/2021	(2.740)	(1.312)	(127)	(4.179)
Net book value as at 31/12/2021	6.186	240	43	6.469

Notes to the Financial Statements (continued)

8. Intangible assets

The Company's intangible assets are broken down as follows:

<i>Amounts in thousand €</i>	Software	Easements	Total
<u>Cost</u>			
Balance at 1 January 2020	3.734	26.469	30.203
Additions	1.670	28	1.698
Balance at 31 December 2020	5.404	26.497	31.900
<u>Accumulated depreciation</u>			
Balance at 1 January 2020	(2.785)	(13.987)	(16.772)
Amortization charge for the year	(441)	(524)	(965)
Balance at 31 December 2020	(3.226)	(14.511)	(17.737)
Net book amount at 31 December 2020	2.178	11.986	14.164

<i>Amounts in thousand €</i>	Software	Easements	Total
<u>Cost</u>			
Balance at 1 January 2021	5.404	26.497	31.900
Additions	306	22	329
Transfers for the period 1/1-31/12/2021	269		269
Balance at 31 December 2021	5.979	26.519	32.498
<u>Accumulated depreciation</u>			
Balance at 1 January 2021	(3.226)	(14.511)	(17.737)
Amortization charge for the year	(657)	(524)	(1.181)
Balance at 31 December 2021	(3.883)	(15.035)	(18.917)
Net book amount at 31 December 2021	2.097	11.484	13.581

9. Investments in associates

The Company's Investments in associates are as follows:

Company	Participation	Value
GASTRADE S.A	20%	14.583
SOUTH STREAM GAS PIPELINE SOCIÉTÉ ANONYME	50%	355
Total		14.938

- The participation of 20% in Gastrade SA - the company that develops the Floating Storage and Regasification Unit (FSRU) of liquefied natural gas (LNG) in Alexandroupolis - was officially ratified on 30.12.2021.

The signing of the agreement came after the recent approval by the European Commission - based on the EU Merger Regulation - for the acquisition of Gastrade by DESFA, DEPA Commerce A.E., GasLog Cyprus

Notes to the Financial Statements (continued)

Investments Ltd. and Bulgarian Bulgartransgaz EAD ("BTG").

The General Assembly of Gastrade has confirmed the FID decision in January 2022, whereby each of the shareholders of Gastrade SA have committed to provide the funds necessary for the successful and timely construction, either in the form of capital contributions or subordinated shareholder loans. Further contributions are planned in the next two years (construction period) in accordance with the FID business plan. Approval of grants has been obtained from the co-funding authority under the Operational Program of the NSRF "Competitiveness, Entrepreneurship and Innovation 2014-2020" (EPAnEK), with an amount of public spending of 166.7 million Euro. Another significant portion of the FSRU infrastructure will be financed through a (project finance) Bond Loan.

The construction of the FSRU will actively contribute to the country's energy security, liquidity and efficiency and will strengthen Greece's strategic role in SE Europe, offering opportunities for new natural gas exports to the region. This is a crucial European project of Common Interest (PCI - Project of Common Interest - EU Regulation 347/2013), which is a priority for the European Union, as it strengthens security and diversifies the sources and routes of energy supply.

In addition, the project promotes competition among gas suppliers and supports the creation of a transaction hub in the wider region of Southeastern Europe, leading to lower prices that will benefit all final consumers. The FSRU will be connected to the National Natural Gas Transmission System of Greece with a 28 km long pipeline, through which the LNG will be promoted to the markets of Greece, Bulgaria and the wider region, from Romania, Serbia and N. Macedonia, as far as Moldova and Ukraine. The terminal is expected to be operational by end of 2023.

- The company "SOUTH STREAM GAS PIPELINE SOCIÉTÉ ANONYME" was established and registered in the Registry of Sociétés Anonyme of the Prefecture of Athens under S.A. Reg. No. 69873/01/01AT/B/10/198, on 13 July 2010. The company's objective is to: (a) develop, finance, construct, manage, operate and maintain the part of the South Stream gas pipeline that is in Greece, which is owned by the company, and (b) provide support services relating to the activities referred to under (a) above, as well as to prepare studies of all types concerning the above activities. DESFA and OAO GAZPROM each have a 50% holding in the company. The company is currently dormant; therefore, no financial results are generated.

10. Financial assets at fair value through profit and loss

Financial assets at fair value through profit and loss relate to the equity investments, being a 7% participation in the newly established company "HELLENIC ENERGY EXCHANGE SA". This participation is classified as level 3 fair values in the fair value hierarchy due to the use of unobservable inputs, including own credit risk.

Notes to the Financial Statements (continued)

11. Other non-current assets

The Company's non-current assets represent guarantee deposits provided for office rent, electricity, water supply and other utilities amounting to €320 thousand.

12. Current and deferred tax

(i) *Income tax expense*

<i>Amounts in thousand €</i>	31/12/2021	31/12/2020
Current tax on profit for the year	11.036	22.668
Tax audit differences from prior years	8	10
Current tax	11.044	22.678
Deferred tax	5.428	4.598
Total tax through P&L	16.472	27.276

(ii) *Numerical reconciliation of income tax expense*

A reconciliation between the income tax expense and the accounting profit before tax multiplied by tax rates in force in Greece (2021: 22%, 2020: 24%) is as follows:

<i>Amounts in thousand €</i>	1/1/2021 – 31/12/2021	1/1/2020 – 31/12/2020
Profit before taxes	79.607	110.039
Tax at statutory tax rate	17.514	26.410
<u>Tax effect of:</u>		
Non-tax deductible expenses	760	856
Change in tax rate	(1.810)	-
Tax audit differences from prior years	8	10
Income tax expense	16.472	27.276

(iii) *Current income tax liability / asset*

Income tax liability / asset is analysed as follows:

<i>Amounts in thousand €</i>	31/12/2021	31/12/2020
Income tax	13.503	31.019
Prepaid income tax for the year	(15.797)	(28.528)
Refund of prepaid income tax	-	-
Withholding income tax for the year	(11)	(77)
Total income tax liability/(asset) in Statement of Financial Position	(2.304)	2.414

Notes to the Financial Statements (continued)

(iv) Deferred tax

Deferred tax balances are as follows:

Amounts in thousand €	31/12/2021	31/12/2020
Deferred tax assets	22.754	25.602
Deferred tax liabilities	(49.508)	(46.961)
Total deferred tax in Statement of Financial Position	(26.754)	(21.359)

Deferred tax assets and liabilities are analyzed as follows:

Deferred tax assets	Grants	Defined Benefits Obligation	Bad Debt	Inventory Obsolete	Provisions	Lease Liabilities	Others	Totals
At 1 January 2020	7.726	960	1.216	2.939	9.438	1.602	49	23.929
(Charge) / credit to P&L	1.586	(60)	52	(68)	201	(95)	-	1.617
(Charge) / credit to OCI	-	56	-	-	-	-	-	56
At 31 December 2020	9.312	955	1.268	2.871	9.639	1.507	49	25.602
At 1 January 2021	9.312	955	1.268	2.871	9.639	1.507	49	25.602
Effect from change in IAS 19		(30)						(30)
(Charge) / credit to P&L	677	(110)	(1.094)	(239)	(1.969)	(96)	(49)	(2.880)
(Charge) / credit to OCI	0	63	0	0	0	0	0	63
At 31 December 2021	9.989	878	174	2.632	7.669	1.411	0	22.754

Deferred tax liabilities	PPE	Prepaid expenses	Others	Total
At 1 January 2020	40.745	0	2	40.747
Charge / (credit) to P&L	6.161	0	54	6.215
Charge / (credit) to OCI	0	0	0	0
At 31 December 2020	46.905	0	56	46.961
At 1 January 2021	46.905	0	56	46.961
Charge / (credit) to P&L	1.435	1.168	(56)	2.547
Charge / (credit) to OCI	0		0	0
At 31 December 2021	48.340	1.168	0	49.508

13. Inventories

The Company's inventories are as follows:

Amounts in €	31/12/2021	31/12/2020
Natural gas (operational and balancing purposes)	14.394	11.323
Materials for the construction and maintenance of a natural gas pipeline	17.965	17.840
Total cost	32.358	29.163
Impairment provision for obsolete materials	(11.963)	(11.963)
Net balance	20.395	17.199

Notes to the Financial Statements (continued)

No additional impairment provision has been recorded in 2021 for obsolete stock.

There are no liens on inventories.

14. Trade and other receivables

The Company's total receivables are broken down as follows:

<i>Amounts in thousand €</i>	31/12/2021	31/12/2020
Trade debtors	33.136	27.308
Allowance for credit losses	(4.757)	(4.757)
Trade debtors (net)	28.379	22.551
Other Debtors	745	764
Allowance for credit losses	(520)	(520)
Other Debtors (net)	226	244
Advances to suppliers	2.574	1.907
Loans and advances to employees	245	243
Security supply duty	1.383	1.027
Prepaid expenses	6.376	942
Accrued revenue	21.127	20.986
Total	60.310	47.900

The loss allowances for trade receivables as at 31 December reconcile to the opening loss allowances as follows:

	Year ended	
<i>Amounts in thousand €</i>	31/12/2021	31/12/2020
Opening loss allowance at 1 January	5.277	5.059
Increase in loss allowance recognized in profit or loss during the year	-	411
Unused amount reversed	-	(193)
Closing loss allowance at 31 December	5.277	5.277

The Company applies the IFRS 9 simplified approach to measure expected credit losses using a lifetime expected loss allowance for all trade receivables. The expected credit loss ("ECL") model is based on the difference between the contractual cash flows due in accordance with the contract and all the cash flows that the Company expects to receive. The shortfall is then discounted at an approximation to the asset's original effective interest rate.

To measure the expected credit loss in relation to trade receivables and for significant clients representing over 90% of total balance, the company assesses the expected credit loss individually, based on the client's specific characteristics and circumstances. As per note 22, a significant amount of cash guarantees has been obtained (as per applicable regulation) from customers, which mitigates the recoverability risk on trade receivables.

Notes to the Financial Statements (continued)

15. Cash and cash equivalents

Cash and cash equivalents comprise cash and short-term bank deposits with an original maturity of three months or less. The carrying amount of these assets is approximately equal to their fair value. In particular:

Amounts in thousands €	31/12/2021	31/12/2020
Cash on hand	8	4
Sight and time deposits	102.716	163.872
Total	102.724	163.876

16. Share capital and reserves

The issued share capital of the Company consists of 7.258.644 shares of a nominal value of € 77.71 each.

The analysis of the ownership of the Company's shares as at 31 December 2021 is as follows:

Shareholder	Number of shares	Share capital (in € thousand)	Percentage
Senfluga Energy Infrastructure Holdings S.A.	4.790.705	372.286	66%
Ministry of Environment and Energy	2.467.939	191.784	34%
Total	7.258.644	564.069	100%

Under Greek Corporate Law, entities are required to transfer on an annual basis a minimum of five percent of their annual profit (after income taxes) to a statutory reserve, until such reserve equals one-third of the issued share capital. As of December 31, 2021 and 2020, this reserve amounted to Euro 40.662 thousand and 37.512 thousand respectively. This statutory reserve cannot be distributed to the shareholders.

Amounts in thousands €	31/12/2021	31/12/2020
Statutory reserves	40.662	37.512
Value of real estate and other fixed assets acquired free of charge	449	449
Total	41.111	37.960

17. Dividends

On 24 June 2021, the General Shareholders' meeting approved the distribution of dividend of a total amount of € 110.000 thousand, consisting of € 37.504 thousand (approx. € 5,17 per share) relating to profits from 2020 and € 72.496 thousand (approx. € 9,99 per share) relating to profits from prior years. The dividend was paid in 2021.

Notes to the Financial Statements (continued)

18. Borrowings

The Company's borrowings are expressed in Euro and have been granted by the European Investment Bank. The amounts payable within one year from the financial statement reporting date are classified as short-term, and those payable beyond one year are classified as long-term. The Company's loans are broken down, per main financing organization, as follows:

<i>Amounts in € thousand</i>	31/12/2021		31/12/2020	
Bank	Short-term liabilities	Long-term liabilities	Short-term liabilities	Long-term liabilities
EUROPEAN INVESTMENT BANK	545	4.909	545	5.455
EUROPEAN INVESTMENT BANK	-	-	1.083	-
EUROPEAN INVESTMENT BANK	833	-	833	833
EUROPEAN INVESTMENT BANK	455	4.545	455	5.000
EUROPEAN INVESTMENT BANK	1.304	13.696	1.304	15.000
EUROPEAN INVESTMENT BANK	1.400	17.500	1.400	18.900
EUROPEAN INVESTMENT BANK	1.875	18.750	1.875	20.625
EUROPEAN INVESTMENT BANK	1.563	17.188	1.563	18.750
EUROPEAN INVESTMENT BANK	3.636	25.455	3.636	29.091
EUROPEAN INVESTMENT BANK	2.667	24.000	2.667	26.667
Total Liabilities	14.278	126.042	15.362	140.320

All loan facilities are at fixed interest rates as follows:

Bank	Final maturity date of Long-term liabilities	Loan interest rate
EUROPEAN INVESTMENT BANK	17/7/2031	4,48%
EUROPEAN INVESTMENT BANK	17/7/2021	4,33%
EUROPEAN INVESTMENT BANK	10/7/2022	4,89%
EUROPEAN INVESTMENT BANK	10/7/2032	4,98%
EUROPEAN INVESTMENT BANK	31/1/2033	4,62%
EUROPEAN INVESTMENT BANK	31/5/2035	3,88%
EUROPEAN INVESTMENT BANK	20/12/2032	3,26%
EUROPEAN INVESTMENT BANK	21/10/2033	3,66%
EUROPEAN INVESTMENT BANK	16/12/2029	1,92%
EUROPEAN INVESTMENT BANK	3/11/2031	1,18%

Loan covenants

The Company has complied with covenants throughout the reporting period.

Notes to the Financial Statements (continued)

In September 2021, the Company signed a €505 million Common Bond Loan with the 4 Greek systemic banks (National Bank of Greece, Eurobank, Alpha Bank, and Piraeus Bank) for the financing of its investment plan. This comprised from a €405 committed Capex facility, a €30 million committed Revolving Facility and an uncommitted accordion option of €70 million. The tenor of the loan agreement is twelve (12) years and its purpose is to finance the ten-year Development Plan of the NNGS which carries the significant investments in infrastructure that will upgrade and expand the NNGS.

Furthermore, in December 2021 the Company signed a €25 million Loan with the EIB for the financing of its North Macedonia Project, with a tenor of 15 years.

In this respect the Company has ensured the diversification of funding providers by increasing its number of Lenders and establishing organic relationships with them.

19. State Grants

State grants relate to investments in fixed assets and are recognized as income along with the depreciation of the subsidies assets, which mainly concern technical equipment. In accordance with the prevailing legislation certain restrictions apply to the transfer of the subsidies fixed assets and the modification of the legal status of the Company. The relevant audits performed by the competent authorities have not identified any non-compliance with such restrictions. There are no unfulfilled conditions or other contingencies attaching to these grants. The movement of the balance of state grants is analyzed as follows:

<i>Amounts in thousand €</i>	31/12/2021	31/12/2020
At 1 January	240.823	247.289
Grants received	627	4.788
Amortization of grants	(11.159)	(11.253)
At 31 December	230.292	240.823
Short Term State Grants	11.205	10.990
Long Term State Grants	219.086	229.833

The Company recognizes Government Grants that cumulatively satisfy the following criteria:

- a) There is reasonable certainty that the company has complied or will comply with the conditions of the grant and
- b) it is probable that the amount of the grant will be received. Government Grants are booked at fair value and are systematically recognized as revenues according to the principle of matching the grants with the corresponding costs that they are subsidizing.

Government Grants that relate to assets are included initially in long-term liabilities as deferred income and are recognized systematically and rationally as revenues over the useful life of the fixed asset. The part of deferred income concerning next year's revenue is presented in Short-term liabilities.

Notes to the Financial Statements (continued)

20. Lease liabilities

The Company has adopted IFRS 16 "Leases" retrospectively from 1 January 2019. For further details of the adoption of IFRS 16, please refer to Note 2.16.

Lease liabilities at 31 December 2021 and 2020 are as follows:

	2021	2020
As at 1 January	6.279	6.675
Additions	1.624	1.009
Accretion of Interest	228	225
Payments	(1.461)	(1.629)
As at 31 December	6.670	6.279
Current Lease Liabilities	1.009	1.235
Non-Current Lease Liabilities	5.660	5.044

Maturity Analysis:

Not Later than one year	1.009	1.235
In the second year	675	134
From the third to fifth year	213	153
After five years	4.773	4.757
Total Lease Liabilities 31 December	6.670	6.279

The following are the amounts recognized in profit or loss of 2021 :

Depreciation expense of right-of-use assets	1.293
Interest expense on lease liabilities	228
Expense relating to short-term leases	757
Expense relating to leases of low-value assets	3
Total amount recognized in profit or loss	2.281

21. Employee benefit obligation

The Company's liability to employees working in Greece for the future payment of benefits depending on the employment time of each one of them is measured and presented on the basis of the expected payment of each employee's accrued right at the financial statement reporting date, discounted at its present value, taking into account the estimated time of payment thereof. The accumulated benefits in each period are charged to profit or loss with a corresponding increase in the retirement liability. The benefits paid to retiring employees are charged against such liability.

The number of personnel employed by the Company as at 31.12.2021 is 510 (31.12.2020: 472).

Amounts recognized in the Statement of Comprehensive Income in respect of these defined benefit obligation are as follows:

Notes to the Financial Statements (continued)

<i>Amounts in thousands €</i>	1/1-31/12/2021	1/1-31/12/2020
Service cost	115	436
Net expense recognized in the Statement of Comprehensive Income	115	436
Actuarial (gains) / losses PVDBO	282	232
Net (gain) / loss recognized in Total Comprehensive Income	397	668

The above recognized expense is included into the operating expenses as follows:

<i>Amounts in thousands €</i>	1/1-31/12/2021	1/1-31/12/2020
Cost of sales	91	259
Administrative expenses	24	177
Total	115	436

The movement in the respective employee benefit obligation is as follows:

<i>Amounts in thousands €</i>	31/12/2021	31/12/2020
At 1 January	3.980	3.999
Effect due to change in IAS 19 on 1.1.2021	(136)	-
Total:	3.844	3.999
Service cost	80	173
Interest cost	14	30
Benefits paid	(248)	(687)
Actuarial (Gains) / Losses	282	232
Settlement/ Curtailment/Termination loss/ (gain)	21	233
At 31 December	3.993	3.980

On 1.1.2021 the effect of the implementation of the new decision of IFRIC on Attributing Benefit to Periods of Service under a defined benefit plan (see Note 2.4) amounted to 136 thousand €. Due to the low materiality this change in the Liability for employee benefit is directly recognized in Equity.

Company' s staff retirement indemnity liability was determined through an actuarial study carried out by an independent recognized actuarial firm. The key amounts and long-term assumptions of the actuarial study of as of 31 December 2021, are presented below:

Notes to the Financial Statements (continued)

Basic assumptions in the actuarial study	as of 31/12/2021	as of 31/12/2020
Actuarial method of measurement:	Projected unit Credit Method	Projected unit Credit Method
Average annual long-term rise of inflation	0,4% by 2022, 1,1% by 2023, 1,6% by 2024, 1,8% by 2025 and 1,9 %thereafter	0,7% by 2021, 0,9% by 2022, 1,0% by 2023, 1,6% by 2024 and 1,8 %thereafter
Average annual payroll increase	1,5%	1%
Discount interest rate	0,50%	0,40%

The sensitivity of the defined benefit obligation to changes in the basic assumptions is as follows:

	Change in assumption 31/12/2021	Impact on defined benefit obligation 31/12/2021
Discount rate	Increase by 0,5%	Decrease by 3,6%
Salary growth rate	Decrease by 0,5%	Decrease by 3,1%

The above sensitivity analyses are based on a change in an assumption while holding all other assumptions constant. In practice, this is unlikely to occur, and changes in some of the assumptions may be correlated. When calculating the sensitivity of the defined benefit obligation to significant actuarial assumptions the same method (present value of the defined benefit obligation calculated with the projected unit credit method at the end of the reporting period) has been applied as when calculating the defined benefit liability recognized in the statement of financial position.

22. Trade and other payables

The Company's total trade and other payables are broken down as follows:

Amounts in thousand €	31/12/2021	31/12/2020
Suppliers	22.642	19.120
Social security funds	1.036	1.152
Sundry creditors	3.392	1.900
Customer Cash Guarantees	40.401	25.392
Accrued expenses	23.585	25.192
Related parties (shareholders) (see Note 24)	784	396
Liability to Hellenic Competition Commission	3.224	4.299
& Total	95.065	77.451

Notes to the Financial Statements (continued)

23. Other taxes payable

The Company's total other taxes payable are broken down as follows:

Amounts in thousands €	31/12/2021	31/12/2020
Value added tax	294	2.195
Payroll taxes and duties	1.002	957
Third party fees taxes and duties	6	6
Other taxes & duties	307	125
Total	1.609	3.284

24. Related party transactions

(a) Shareholders of the Company

Name	Place of incorporation	Ownership interest
Senfluga Energy Infrastructure Holdings S.A.	Greece	66%
Ministry of Environment and Energy	Greece	34%

Senfluga Energy Infrastructure Holdings S.A. consolidates the Company in its own financial statements by applying the full consolidation method. The Greek State (Ministry of Environment and Energy) owns 34% of the Company's share capital.

(b) Related party entities

The Company has the following balances with related parties, all of them are either direct shareholders of the Parent company, Senfluga Energy Infrastructure Holdings S.A., or subsidiaries of these shareholders and relate primarily to liabilities for seconded executives:

Liabilities:	31/12/2021	31/12/2020
SNAM S.p.A.	601	55
SNAMRETEGAS (SNAM) S.p.A.	-	254
ENAGAS INTERNACIONAL S.L.U.	61	35
FLUXYS EUROPE B.V.B.A.	80	52
ENAGAS SERVICES SOLUTIONS S.L.U.	42	-
Total	784	396

Expenses:	31/12/2021	31/12/2020
SNAM S.p.A.	889	24
SNAMRETEGAS (SNAM) S.p.A.	-	433
ENAGAS INTERNACIONAL S.L.U.	310	239
FLUXYS EUROPE B.V.B.A.	348	320
ENAGAS SERVICES SOLUTIONS S.L.U.	214	-
Total	1.761	1.016

Notes to the Financial Statements (continued)

Revenue:	31/12/2021	31/12/2020
SNAM S.p.A.	-	44
ENAGAS SERVICES SOLUTIONS	-	96
Total	-	140

All related parties transactions were made on an arm's length basis.

(c) Remuneration of BoD members & Key management personnel:

Amounts in thousand €	31/12/2021	31/12/2020
BoD members	106	96
SC members	55	34
Total	161	130

The remuneration of members of the Board of Directors are proposed and approved by the Annual General Assembly Meeting of the shareholders.

The remuneration of directors and other members of key management for the Company for the period 1/1-31/12/2021 and 1/1-31/12/2020 amounted to Euro 2.906 thousand and Euro 2.848 thousand respectively.

25. Financial risk management

The Company's risk management is controlled by management under policies approved by the board of directors. The Company is exposed to various financial risks; the most significant risks are market risk - including foreign exchange risk and interest rate risk - credit risk and liquidity risk. The Company's risk management policies are aimed at minimizing the possible negative effects of such risks on the financial position and performance of the Company. As referred in note 2.10 the main financial instruments used by the Company are cash, bank deposits, trade and other receivables and liabilities and bank loans. From time to time, the Company Management reviews and revises the relevant policies and procedures relating to the management of financial risks, as described below:

25.1. Market risk

25.1.1. Interest rate risk

As referred to in note 18 all the Company's borrowings are in Euro. All borrowings are at fixed rate, therefore fair value risk exists. Management continuously monitors interest rate fluctuations and the Company's financing needs and assesses, on an individual basis, the duration of borrowings and the difference between fixed and floating interest rates. The weighted average interest rate of the loans (3.82%) is in line with current interest rates offered by the banks, therefore the fair value of the borrowings approximates their carrying amount.

Notes to the Financial Statements (continued)

25.1.2. Foreign exchange risk

The Company is exposed to limited foreign exchange risk as all its assets and most of its liabilities are in Euro.

25.2. Credit risk

Risk management

Credit risk arises from cash and cash equivalents and deposits with banks and financial institutions, as well as trade receivables and other financial assets.

The carrying value of financial assets at each reporting date is the maximum credit risk to which the Company is exposed in respect of the relevant assets, which, as at the financial statement reporting date, are broken down as follows:

Amounts in thousand €	31/12/2021	31/12/2020
Trade receivables and other financial assets	60.310	47.900
Cash and cash equivalents	102.724	163.876
Total	163.034	211.776

The Company has established specific credit policies under which customers are analyzed for creditworthiness and there is an effective management of receivables in place both before and after they become overdue and doubtful. In monitoring credit risk, customers are grouped according to their credit risk characteristics, aging profile and existence of previous financial difficulties. The credit risk groups are being assessed on the basis of historical loss experience for each group. The historical loss experience is assessed on an annual basis taking into account, the most recently available data.

Customers that are characterized as doubtful are reassessed at each reporting date for the estimated loss that is expected and an appropriate impairment allowance is established.

The Company's cash and cash equivalents are mainly invested in highly rated counterparties and with a very short-term tenor.

The Company's financial assets that are subject to the expected credit loss model are trade receivables from provision of services and sales of balancing and operating gas. The Company applies the IFRS 9 simplified approach to measuring expected credit losses which uses a lifetime expected loss allowance for all trade receivables. Refer also to note 14.

While cash and cash equivalents are also subject to the impairment requirements of IFRS 9, the identified impairment loss was immaterial.

Notes to the Financial Statements (continued)

25.3. Liquidity risk

Prudent liquidity risk management implies maintaining sufficient cash and the availability of funding through an adequate amount of committed credit facilities to meet obligations when due.

The liquidity risk is maintained at low levels through the availability of adequate cash and cash equivalents and credit lines.

Following is a table presenting an analysis of financial liabilities, according to their contractual settlement dates.

31/12/2021	Up to 1 year	Between 1 to 5 years	More than 5 years
Borrowings	14.278	53.779	72.263
Leases	1.009	888	4.773
Trade and Other Payables	96.674	-	

31/12/2020	Up to 1 year	Between 1 to 5 years	More than 5 years
Borrowings	15.362	54.612	85.708
Leases	1.235	287	4.757
Trade and Other Payables	83.149	-	-

25.4. Capital Management

The Company's objectives when managing capital are to:

- safeguard its ability to continue as a going concern, so that they can continue to provide returns for shareholders and benefits other stakeholders, and
- Maintain an optimal capital structure to reduce the cost.

The Company may adjust the amount of dividends paid to shareholders, return capital to shareholders, issue new shares or sell assets to reduce debt.

An important means of managing capital is the use of the gearing ratio (ratio of net debt to equity) which is monitored at Company level. Net debt includes interest bearing loans and notes, less cash and cash equivalents.

Amount in €	31/12/2021	31/12/2020
Long-term borrowings	126.042	140.320
Short-term portion of long-term borrowings	14.278	15.362
Cash and cash equivalents	(102.724)	(163.876)
Net debt	37.596	(8.194)
Total equity	827.430	874.406
Gearing ratio	4,5%	-0,9%

Notes to the Financial Statements (continued)

25.4.1 Other significant issues for the Management

The COVID-19 outbreak has also developed vastly in 2021, with a significant number of infections. Measures taken by various governments to contain the virus have affected economic activity. Management has taken reasonable measures to monitor and prevent the effects of the COVID-19 virus, such as safety and health measures for the employees (like social distancing and working from home) and securing the appropriate maintenance and technical support of the premises that are essential to the Company's operation.

At this stage, the impact on our business and results is limited. Management will continue to follow the various national institutes policies and advice and in parallel will do their utmost to continue the Company's operations in the best and safest way possible without jeopardizing the health of its people. Refer also to Note 2.2.

25.5. Fair value measurement

The Company applies fair value measurement to the financial assets at fair value through profit and loss (Note 10), which is classified as Level 3. An explanation of each level follows.

Level 1: The fair value of financial instruments traded in active markets (such as publicly traded derivatives, and equity securities) is based on quoted market prices at the end of the reporting period. The quoted market price used for financial assets held by the Company is the current bid price. These instruments are included in level 1.

Level 2: The fair value of financial instruments that are not traded in an active market (for example, over-the-counter derivatives) is determined using valuation techniques which maximize the use of observable market data and rely as little as possible on entity-specific estimates. If all significant inputs required to fair value an instrument are observable, the instrument is included in level 2.

Level 3: If one or more of the significant inputs is not based on observable market data, the instrument is included in level 3. This is the case for unlisted equity securities.

The Company's policy is to recognize transfers into and transfers out of fair value hierarchy levels as at the end of the reporting period.

25.6. Provisions

Movement of provisions during the financial year is set out below:

<i>Amounts in thousand €</i>	1/1/2021 – 31/12/2021
Carrying amount at start of year	20.741
Unused amounts reversed	(2.414)
New amounts during the year	533
Carrying amount at end of year	18.860

The Company's contingent liabilities and provisions are analyzed as follows:

(i) Cases in litigation or under arbitration

As at 31 December 2021, there remain a number of third-party claims and legal actions against the Company relating to old trade and other disputes, as well as actions lodged against the Company involving compensation for expropriation of land related to the construction-extension of the conduit and other tangible assets. Considering the progress of these cases and advice from the Company's legal counsel, the Company has raised a provision

Notes to the Financial Statements (continued)

for the estimated amount of settlement of the aforementioned cases of €18.860 thousand. The total amount of contingent liabilities due to claims under legal dispute is amounted to € 21.028.

(ii) Tax audit

DESFA S.A. has been tax audited by the tax authorities up to fiscal year 2010. For fiscal years 2011 until 2013 special tax audits were performed in accordance with Article 82(5) of Law 2238/1994 by its statutory auditor and respective tax compliance reports were issued. For fiscal years **2014 to 2020** special tax audits were performed in accordance with Article 65a of Law 4174/2013 by its statutory auditor and respective tax compliance reports were issued. In any case and according to Circ.1006/05.01.2016 these companies for which a Tax Compliance Certificate has been issued are not excluded from a further tax audit by the relevant tax authorities. Therefore, the tax authorities may perform a tax audit as well. However, the Company's management believes that the outcome of such future audits, should these be performed, will not have a material impact on the financial position of the Company. Up to the date of approval of these financial statements, the Company's tax audit, by the statutory auditors, for the fiscal year **2021** is in progress. However it is not expected that material liabilities will arise from this tax audit.

(iii) Letters of guarantee

The Company had provided the following letters of guarantee to suppliers:

<i>Amounts in thousand €</i>	31/12/2021	31/12/2020
Liabilities		
Supplier's letters of guarantee	15.587	28.931
Letters of guarantee from third parties	15.587	28.931

26. Commitments

26.1. Commitments from operating leases

The Company has entered into contracts for the operating lease of vehicles and buildings. From 1 January 2019, the Company has recognized right-of-use assets and lease liabilities for these leases following the adoption of IFRS 16 (see note 2.16 and note 7 for further information).

26.2. Other commitments

<i>Amounts in thousand €</i>	2021	2020
Liabilities		
Commitments for projects under construction	95.884	69.927
Total	95.884	69.927

27. Other non-current liabilities

The Company's long-term liabilities represent the performance guarantee in relation to Contract 497/12 with Egnatia Odos, of € 145 thousand.

28. Restatements

There are no restatements in the financial statements of 2021.

Notes to the Financial Statements (continued)

29. Events occurring after the reporting period

- Concerning **Russia/Ukraine** crisis the Company is in close cooperation with the parent company, and they are both monitoring on a continuous base the progress of the crisis and the potential effects/risks to the Company. Management has already taken up reasonable measures to address these effects/risks and based on the current state of crisis, no risk of operations' disruption exists and the Company has adequate liquidity to continue its operation in the FY 2022.

Moreover, RAE, with their Decision 63/2022, approved DESFA's proposal regarding the offering of Additional capacity in one or more NNGTS Entry Points in case of crisis level 2 or 3, as a measure of mitigating the consequences of natural gas imports curtailments or disruption, through another NNGTS Entry Point. Finally, DESFA proposed to the Regulator the increase of Revithousa LNG terminal storage capacity, that would result to a significant increase of its annual throughput, while presented to the Ministry and the Regulator its proposal on the implementation of the draft amendment of the Regulation (EU) 2017/1938, concerning the access to storage facilities located in neighboring countries, for security of supply purposes.

Notes to the Financial Statements (continued)

Besides the above, there are no events that could have a material impact on the Company's financial structure or operations that have occurred since **1/1/2022** up to the date of issue of these financial statements.

Athens 06/05/2022

Konstantinos Kosmadakis
Chairman of BoD

Panagiotis Tampourlos
Member of BoD

Maria Rita Galli
Chief Executive Officer

Marc Vercruysse
Chief Financial Officer

Christiana Mougou
**Accounting & Tax
Department Manager**

HELLENIC GAS TRANSMISSION SYSTEM OPERATOR
Financial Statements for the year ended 31 December 2021
(Amounts in Euro thousand)

APPENDIX: UNBUNDLED FINANCIAL STATEMENTS - UNBUNDLED STATEMENTS OF COMPREHENSIVE INCOME

	<i>S01 TRANSMISSION</i>	<i>S02 USE OF LNG FACILITY</i>	<i>S03C GAS BALANCING</i>	<i>S03D OPERATING GAS</i>	<i>S05C NON TRANSMISSION SERVICES</i>	<i>S05D ADDITIONAL LNG SERVICES</i>	<i>S06 NON REGULATED SERVICES W/O INVESTMENTS</i>	<i>S07 PARTICIPATION IN OTHER COMPANIES</i>	<i>S08 NON REGULATED SERVICES WITH INVESTMENTS</i>	<i>S10 SECURITY OF SUPPLY</i>	
	<u>s01</u>	<u>s02</u>	<u>s03c</u>	<u>s03d</u>	<u>s05c</u>	<u>s05d</u>	<u>s06</u>	<u>s07</u>	<u>s08</u>	<u>s10</u>	
	01/01/2021- 31/12/2021	01/01/2021- 31/12/2021	01/01/2021- 31/12/2021	01/01/2021- 31/12/2021	01/01/2021- 31/12/2021	01/01/2021- 31/12/2021	01/01/2021- 31/12/2021	01/01/2021- 31/12/2021	01/01/2021- 31/12/2021	01/01/2021- 31/12/2021	Total
STATEMENT OF COMPREHENSIVE INCOME											
Sales	132.755	50.942	-152	6.872	904	0	9.065	0	0	2.312	202.697
Less: Cost of Sales	-63.988	-34.410	152	-6.872	-65	75	-5.612	-23	0	-6.862	-
Gross Profit	68.767	16.532	0	0	839	75	3.453	-23	0	-4.550	85.092
Other operating income	7.104	135	0	0	1	3	50	4	0	4.560	11.857
	75.871	16.667	0	0	841	78	3.503	-19	0	10	96.949
Administrative expenses	-12.943	-3.929	0	0	-68	-148	-1.476	-9	0	0	-18.573
Distribution expenses	-648	-243	0	0	-4	-1	-48	0	0	0	-945
Other operating expenses	-1.267	-810	0	0	-1	-4	-88	0	0	-10	-2.181
Amortisation of fixed asset grants	8.569	2.590	0	0	0	0	0	0	0	0	11.159
Operating results	69.582	14.275	0	0	767	-76	1.891	-29	0	0	86.409
Financing cost	-4.531	-2.136	0	0	0	0	-152	0	0	0	-6.819
Foreign exchange differences	11	-1	0	0	0	0	6	0	0	0	17
Results before taxes	65.062	12.139	0	0	767	-76	1.745	-29	0	0	79.607
Income tax	-9.005	-1.683	0	0	-106	0	-242	0	0	0	-11.036
Income tax -deferred tax	-4.558	-818	0	0	-5	-7	-34	-5	0	0	-5.428
Tax audit differences from prior years	-5	-2	0	0	0	0	0	0	0	0	-8
Results after taxes	51.494	9.635	0	0	655	-84	1.469	-34	0	0	63.135
Net profit for the period	51.494	9.635	0	0	655	-84	1.469	-34	0	0	63.135
Other comprehensive income											0
Actuarial profit/(loss)	-184	-69	0	0	-1	1	-28	0	0	0	-282
Deferred Tax	41	15	0	0	0	0	6	0	0	0	63
Other comprehensive income of the period after taxes	-143	-54	0	0	-1	1	-22	0	0	0	-219
Total comprehensive income of the period after taxes	51.351	9.581	0	0	654	-83	1.447	-34	0	0	62.916

HELLENIC GAS TRANSMISSION SYSTEM OPERATOR
Financial Statements for the year ended 31 December 2021 (Amounts in Euro thousand)

UNBUNDLED STATEMENTS OF FINANCIAL POSITION

	S01 TRANSMISSION	S02 USE OF LNG FACILITY	S03C GAS BALANCING	S03D OPERATING GAS	S05C NON TRANSMISSION SERVICES	S05D ADDITIONAL LNG SERVICES	S06 NON REGULATED SERVICES W/O INVESTMENTS	S07 PARTICIPATION IN OTHER COMPANIES	S08 NON REGULATED SERVICES WITH INVESTMENTS	S10 SECURITY OF SUPPLY	Total
STATEMENT OF FINANCIAL POSITION											
ASSETS	31/12/2021	31/12/2021	31/12/2021	31/12/2021	31/12/2021	31/12/2021	31/12/2021	31/12/2021	31/12/2021	31/12/2021	
Fixed assets											
Tangible assets	781.885	347.525	0	0	4	6.001	796	5	0	0	1.136.216
Intangible assets	13.579	2	0	0	0	0	0	0	0	0	13.581
Investments in associates	0	0	0	0	0	0	0	14.938	0	0	14.938
Investments in other companies	0	0	0	0	0	0	0	350	0	0	350
Long-term receivables	212	105	0	0	0	0	2	0	0	0	320
Total Fixed Assets	795.675	347.632	0	0	4	6.001	798	15.293	0	0	1.165.404
Current assets											
Inventories	5.946	14.449	0	0	0	0	0	0	0	0	20.395
Trade and other receivables	43.839	10.650	0	0	287	0	4.115	24	0	1.395	60.310
Income tax asset	21.763	-18.539	0	0	-163	-57	-699	-1	0	0	2.304
Cash and cash equivalents	30.910	28.357			481	24.000	5.059	13.917	0	0	102.724
Total current assets	102.457	34.917	0	0	605	23.943	8.474	13.940	0	1.395	185.733
TOTAL ASSETS	898.133	382.550	0	0	609	29.944	9.272	29.233	0	1.395	1.351.137

HELLENIC GAS TRANSMISSION SYSTEM OPERATOR
Financial Statements for the year ended 31 December 2021 (Amounts in Euro thousand)

EQUITY & LIABILITIES

EQUITY

Share capital	391.943	168.351			441	25	1.765	1.064	480	0	564.069
Reserves	30.832	9.465	0	0	59	28	727	0	0	0	41.111
Retained earnings	125.283	65.170	0	0	1.192	-664	3.419	27.911	-61	0	222.250
Total Equity	548.058	242.986	0	0	1.692	-611	5.911	28.975	419	0	827.430

Non-current liabilities

Borrowings	76.588	49.455	0	0	0	0	0	0	0	0	126.042
Employee benefits obligation	2.645	988	0	0	18	-12	355	-1	0	0	3.993
State grants	160.172	58.728	0	0	2	30	151	3	0	0	219.086
Provisions	18.791	161	0	0	-10	0	-65	-16	0	0	18.860
Leases	3.936	1.602	0	0	7	0	104	11	0	0	5.660
Other non-current liabilities	145	0	0	0	0	0	0	0	0	0	145
Inter-activity account	-16.879	-11.139			-1.282	30.406	1.773	-2.809	-420	350	0
Deferred tax liabilities	20.290	6.518	0	0	-6	4	-35	-17	0	0	26.754
Total non-current liabilities	265.687	106.312	0	0	-1.271	30.428	2.283	-2.829	-420	350	400.540

Current liabilities

Trade and other payables	66.386	23.007	0	0	111	386	1.042	3.088	2	1.043	95.065
Leases	702	286	0	0	1	0	18	2	0	0	1.009
Borrowings	7.142	7.136	0	0	0	0	0	0	0	0	14.278
Other taxes payable	1.966	-181	0	0	76	-262	11	-3	0	2	1.609
State grants	8.192	3.004	0	0	0	2	8	0	0	0	11.205
Income tax liability	0	0	0	0	0	0	0	0	0	0	0
Total current liabilities	84.388	33.252	0	0	188	126	1.078	3.087	2	1.045	123.167

Total liabilities

350.075	139.564	0	0	-1.083	30.555	3.361	258	-419	1.395	523.707
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TOTAL EQUITY & LIABILITIES

898.133	382.550	0	0	609	29.944	9.272	29.233	0	1.395	1.351.137
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HELLENIC GAS TRANSMISSION SYSTEM OPERATOR
Financial Statements for the year ended 31 December 2021 (Amounts in Euro thousand)

APPENDIX: UNBUNDLED FINANCIAL STATEMENTS - UNBUNDLED STATEMENTS OF COMPREHENSIVE INCOME

	S01 TRANSMISSION	S02 USE OF LNG FACILITY	S03C GAS BALANCING	S03D OPERATING GAS	S05C NON TRANSMISSION SERVICES	S05D ADDITIONAL LNG SERVICES	S06 NON REGULATED SERVICES W/O INVESTMENTS	S07 PARTICIPATION IN OTHER COMPANIES	S08 NON REGULATED SERVICES WITH INVESTMENTS	S10 SECURITY OF SUPPLY	Total
	01/01/2020- 31/12/2020	01/01/2020- 31/12/2020	01/01/2020- 31/12/2020	01/01/2020- 31/12/2020	01/01/2020- 31/12/2020	01/01/2020- 31/12/2020	01/01/2020- 31/12/2020	01/01/2020- 31/12/2020	01/01/2020- 31/12/2020	01/01/2020- 31/12/2020	
STATEMENT OF COMPREHENSIVE INCOME											
Revenue	147.830	62.322	3.581	3.733	890	0	4.996	0		7.610	230.961
Less: Cost of Sales	-61.724	-23.824	-3.581	-3.733	-220	-229	-2.804	-60	-12	-13.899	110.086
Gross Profit	86.105	38.498	0	0	671	-229	2.192	-60	-12	-6.289	120.875
Other income	4.883	533	0	0	4	14	192	4	2	6.759	12.390
	90.988	39.031	0	0	675	-215	2.384	-57	-10	469	133.265
Administrative expenses	-14.841	-4.886	0	0	-95	-155	-838	0	-14		-20.830
Distribution expenses	-580	-164	0	0	-4	-6	-47	0	0		-800
Other expenses	-2.624	-2.169	0	0	-3	-6	-252	-1	-14	-469	-5.537
Amortisation of fixed asset grants	8.645	2.608									11.253
Operating profits	81.588	34.420	0	0	572	-381	1.247	-58	-39	0	117.350
Financing cost – net	-4.768	-2.446	0	0	0	0	-83	0	-3	0	-7.300
Foreign exchange differences	-14	-3	0	0	0	0	5	0	0	0	-12
Profits before taxes	76.806	31.971	0	0	572	-381	1.170	-58	-41	0	110.039
Income tax	-15.723	-6.586	0	0	-118	0	-241				-22.668
Income tax -deferred tax	-3.350	-1.323	0	0	2	4	70	0	0	0	-4.598
Tax audit differences from prior years	-4	-6	0	0	0	0	0	0	0	0	-10
Profits after taxes	57.729	24.056	0	0	456	-376	998	-58	-42	0	82.763
Net profit for the period	57.729	24.056	0	0	456	-376	998	-58	-42	0	82.763
Other comprehensive income											
Actuarial profit/(loss)	-157	-55	0	0	-2	-4	-14	0	0	0	-232
Deferred Tax	38	13	0	0	0	1	3	0	0	0	56
Other comprehensive income of the period after taxes	-119	-42	0	0	-1	-3	-11	0	0	0	-176
	57.610	24.014	0	0	455	-380	988	-58	-42	0	82.587

HELLENIC GAS TRANSMISSION SYSTEM OPERATOR
Financial Statements for the year ended 31 December 2021 (Amounts in Euro thousand)

UNBUNDLED STATEMENTS OF FINANCIAL POSITION

	<i>S01 TRANSMISSION</i>	<i>S02 USE OF LNG FACILITY</i>	<i>S03C GAS BALANCIN G</i>	<i>S03D OPERATING GAS</i>	<i>S05C NON TRANSMISSIO N SERVICES</i>	<i>S05D ADDITIONAL LNG SERVICES</i>	<i>S06 NON REGULATED SERVICES W/O INVESTMENTS</i>	<i>S07 PARTICIPATION IN OTHER COMPANIES</i>	<i>S08 NON REGULATED SERVICES WITH INVESTMENTS</i>	<i>S10 SECURIT Y OF SUPPLY</i>	Total
STATEMENT OF FINANCIAL POSITION	s01	s02	s03c	s03d	s05c	s05d	s06	s07	s08	s10	
ASSETS	31/12/2020	31/12/2020	31/12/2020	31/12/2020	31/12/2020	31/12/2020	31/12/2020	31/12/2020	31/12/2020	31/12/2020	
Non-current assets											
Tangible assets	800.014	360.155	0	0	1	1.090	769	1	427	0	1.162.456
Intangible assets	14.160	3	0	0	0	0	0	0	0	0	14.164
Investments in associates	0	0	0	0	0	0	0	355	0	0	355
Financial Assets at fair value through profit or loss	0	0	0	0	0	0	0	350	0	0	350
Other non-current assets	157	105	0	0	0	0	2	0	3	0	266
Total Non-Current Assets	814.332	360.263	0	0	1	1.090	770	706	429	0	1.177.591
Current assets											
Inventories	5.473	11.726	0	0	0	0	0	0	0		17.199
Trade and other receivables	33.338	10.141	0	0	305	431	2.043	4	0	1.636	47.900
Cash and cash equivalents	81.640	47.279	0	0	672	30.000	3.786	500	0		163.876
Total current assets	120.451	69.146	0	0	977	30.432	5.829	504	0	1.636	228.975
TOTAL ASSETS	934.783	429.408	0	0	978	31.522	6.599	1.210	430	1.636	1.406.566

HELLENIC GAS TRANSMISSION SYSTEM OPERATOR
Financial Statements for the year ended 31 December 2021 (Amounts in Euro thousand)

EQUITY & LIABILITIES

EQUITY

Share capital	391.943	141.935	0	0	441	26.441	1.765	1.064	480	0	564.069
Reserves	26.981	10.199	0	0	50	28	702	0	0	0	37.960
Retained earnings	158.636	110.080	0	0	953	-581	3.405	-55	-61	0	272.377
Total Equity	577.560	262.214	0	0	1.444	25.888	5.872	1.009	419	0	874.406

Non-current liabilities

Borrowings	83.730	56.591	0	0	0	0	0	0	0	0	140.320
Employee benefits obligation	2.611	963	0	0	15	-14	405	0	0	0	3.980
State grants	166.598	63.063	0	0	1	17	144	0	11	0	229.833
Provisions	21.278	-374	0	0	-6	0	-47	-4	-107	0	20.741
Lease Liabilities	1.002	4.011	0	0	1	0	14	1	16	0	5.044
Other non-current liabilities	145	0	0	0	0	0	0	0	0	0	145
Inter-activity account	-1.420	-3.226	0	0	-688	5.479	-1.064	224	239	456	0
Deferred tax liabilities	15.832	5.696	0	0	-3	4	-11	-6	-153	0	21.359
Total non-current liabilities	289.776	126.724	0	0	-680	5.486	-559	215	6	456	421.423

Current liabilities

Trade and other payables	51.848	23.146	0	0	106	120	1.151	0	0	1.080	77.451
Lease Liabilities	245	982	0	0	0	0	3	0	4	0	1.235
Borrowings	7.142	8.220	0	0	0	0	0	0	0	0	15.362
Other taxes payable	2.880	238	0	0	91	11	-23	-14	0	100	3.284
State grants	7.967	3.015	0	0	0	1	7	0	1		10.990
Current income tax liability	-2.635	4.869	0	0	17	17	147	0	0	0	2.414
Total current liabilities	67.447	40.470	0	0	214	148	1.286	-14	5	1.180	110.736

Total liabilities

357.223	167.194	0	0	-466	5.634	727	201	11	1.636	532.160
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TOTAL EQUITY & LIABILITIES

934.783	429.408	0	0	978	31.522	6.599	1.210	430	1.636	1.406.566
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Notes on the Accounting of Unbundled Financial Statements of HELLENIC GAS TRANSMISSION SYSTEM OPERATOR S.A. for the financial year 2020, in accordance with the Decision No 332/2016 / FEK 3763 / 22.11.2016 and taking also into account the 5th Amendment of the Tariff Regulation (RAE's Decision no 1434/2020 published to OJ 30.10.2020)

1. General information on segregation areas

The accounting unbundling of activities took place in accordance with the instructions of the Regulatory Authority for Energy (RAE) and concerns the distribution of the company's financial statements in unbundled financial statements for each activity of the company. Unbundled financial statements reflect the asset structure, requirements and obligations of each business activity as they would be drawn if they were exercised by different legal entities.

2.a Principles and Rules for Splitting Accounting Segregation

The company, in accordance with RAE's instructions, had to draw up internally unbundled accounts for each distinct activity. The preparation of the unbundled accounts was made extrapolatory by dividing the company accounts directly or indirectly from the activities involved.

Accounts that concern only an activity are allocated directly to this activity. For accounts that cannot be directly allocated to an activity because they relate to either more than one activity or the whole of the Integrated Natural Gas Company (e.g. legal service, computerization, accounting), they have been selected and approved standard rules for the allocation of these accounts. The Integrated Natural Gas Corporation has used these approved rules to divide indirectly into its distinct activities account details that cannot be directly allocated.

2.b Dispensing Principles and Rules for the Preparation of Annual Unbundled Financial Statements

Unbundled financial statements are made ex-accounting, further allocating the financial statements prepared in accordance with International Accounting Standards.

Until 31.12.2019, the following activities (profit centres) were applicable :

1. Transmission –S01
2. Use of LNG Facility –S02
3. Gas balancing and Operating Gas –S03, with further split of revenue and expenses to Gas balancing – S03A and Operating Gas – S03B. (This activity is now split completely to the new S03C and S03D respectively – see below under point 4 Notes on the activities)
4. Supporting Activities (intermediate account) – S04
5. Other Gas activities – S05, with further split to ancillary Transmission Services – S05A and additional LNG Services – S05B (This activity is now split completely to the new S05C and S05D respectively – see below under point 4 Notes on the activities)
6. Other services (non- regulated) – S06 (this activity is now split to the activities S06 and S08 depending on whether the activity is related to new investments or not – see below under point 4 Notes on the activities)
7. Participation in other companies – S07
8. LNG truck loading – S08
9. LNG loading to vessels – S09
(note: S08 and S09 are now merged to the new S08, which includes the non-regulated services with investments. However, the regulated activities related to the truck loading station on Revithoussa and the small scale jetty at Revithoussa are transferred to the new S05D (additional LNG services – see below under point 4 Notes on the activities)
10. Security of supply account – S10

The 5th Amendment of the Tariff Regulation triggers the necessity for new categories of services subject to the unbundling rules. As a result the activities among which the accounts of the company are being split from 1.1.2020 are the following:

1. Transmission –S01
2. Use of LNG Facility –S02
3. Gas balancing – S03C
4. Operating gas – S03D
5. Supporting Activities (intermediate account) – S04
6. Non –Transmission Services – S05C
7. Additional LNG Services – S05D
8. Non regulated services without investment – S06
9. Participation in other companies – S07
10. Non regulated services with investments – S08
11. Security of supply account – S10

At the end of each accounting year unbundled Statements of Financial Position and Statements of Comprehensive Income have prepared for each of the distinct Natural Gas Activities of the Integrated Natural Gas Operators.

Unbundled financial statements are presented in accordance with International Accounting Standards and Appropriate Accounting Principles and Principles of Accounting Segregation.

3.a Direct Allocation of Accounts to the Affiliated Activities

Accounts directly related to an activity are allocated directly and entirely to this activity. The criterion for direct allocation is mainly the use or mode of creating this account. The direct way of allocating an activity to an activity relates to the allocation without using an intermediate allocation method and is made taking into account the boundaries of each activity (for example, through time or other direct allocation).

3.b Indirect Allocation of Accounts to the Affiliated Activities

Accounts that cannot be allocated entirely directly to an activity should be separated by sharing keys. Sharing should be based on allocation keys and be relevant to the nature of the account.

4. Notes on the activities

- a) Activities S01 (Gas Transmission) & S02 (Use of LNG facility) remain unchanged and are the core activities of DESFA
- b) Activities S03C (Gas Balancing) and S03D (Operating Gas) refer to non-profitable activities that are necessary for the follow-up of certain special DESFA transactions. The latter are regulated by the National Natural Gas System (NNGS) Management Code and the relevant decisions of RAE. On the basis of these, the above activity does not participate in the indirect allocation nor does it receive any expenses and revenues beyond those allowed by the abovementioned decisions: costs are only the purchase price of the operating gas and balancing gas and the cost of transferring the balancing gas to the Users; Revenues are only the (equal) charges of DESFA to Users. This activity does not have fixed assets
- c) S04 (support services) is not an activity in accordance with RAE's decisions but an intermediate account, which is subsequently divided into activities in accordance with the allocation keys and what is specifically mentioned in the present. Following the abovementioned under note (3.b) the allocation of this intermediate account is done only to the activities S01, S02, S05C, S05D, S06, S07 and S08. Being an intermediate account, this activity is not reported with a PnL and balance sheet.

Supportive services include, but are not limited to, administration and support services, financial services, legal services, strategy and development, IT (when not regarding a specific activity), public relations and corporate social responsibility, internal control, safety, quality and hygiene (when not regarding a specific activity), risk monitoring, etc.

- d) Non-Transmission Services (S05C) refer to the Services which are offered by the Operator of the National Natural Gas System to other parties and relate to the Transmission System (but are not included in the Transmission Services) mainly such as (1) Natural gas odorization, (2) Administrative, technical & metrological support on users at NGTS entry point's metering stations and (3) Training/Seminars.
- e) Additional LNG Services (S05D) refer to the Services which are offered by the Operator of the National Natural Gas System to other parties and relate to the LNG Installation (but are not included in the LNG Service) such as. (1) the services of inerting, cooling, watering, loading of LNG vessels from existing jetty (2) the new truck loading services incl. ancillary ones and (3) loading of ssLNG vessels at the Second Jetty.
- f) Non-regulated services without investment (S06) includes the non-regulated services that are provided by DESFA and do not require, or require negligible, use of assets of DESFA.
- g) Non-regulated services with investment (S08) include all non-regulated services that are provided by DESFA and require the construction of new investments which are though not included in the Regulated Asset Base.
- h) S07 is an activity which reflects the participation of DESFA to other companies. Assets of this activity are the corresponding shares of DESFA and revenue reflects the corresponding dividends.
- i) S10 (Security of Supply Account) is a special non-profit activity that reflects the administration of the security of supply account. The latter is governed by the relevant decisions issued by RAE and, on the basis of these, is "segregated" by the other actions of DESFA. Therefore, this activity does not participate in the indirect allocation nor receives any expenses and revenues beyond those allowed by the aforementioned decisions by RAE: income is only the security of supply fee and the interest on the account and the cost only the compensations on the security of supply and any debtor's interest. Also it has no fixed assets.

5. Methods of Allocation

Direct Allocation

In order to track the accounting transactions of the activities, using the above individual remarks, individual internal accounts are kept in accordance with the International Financial Reporting Standards (IFRS), where the elements of the assets and liabilities are recorded in a discreet and distinctive manner as well as the corresponding revenues and expenses.

For this purpose, each transaction and its supporting document (purchase / sales invoice, proof of receipt / payment) is identified by the relevant staff and recorded in the account of the activity concerned (DIRECT ALLOCATION). Similarly, the distribution of the working hours of the company's staff is allocated directly. For this purpose a special application (es-project) is used.

Indirect Allocation

Transactions that cannot be directly allocated to an activity because they involve more than one activity or the whole of DESFA SA., are recorded during the financial year in the Support Services - S04. At the end of the year, the balances of

accounts accrued in S04 are allocated, based on the allocation keys set by RAE.

Below is an analysis and annotation of the allocation keys for indirect allocation under RAE Directive 332/2016:

A) Total of Direct Allocation of Assets' Activity

The accounts related to the creation of the Company's fixed assets are allocated according to the "Total Directly Distributed Fixed Asset Allocation Key". This allocation key reflects the amount of the total fixed assets of the business directly attributable to the total fixed assets of the company that is directly allocated and applied for the allocation of the rest of the balance sheet accounts associated with the assets pool.

As regards the indirect allocation of fixed assets:

1. Fixed assets included in the Regulated Asset Base under the Pricing Regulation (i.e. included in a RAE-approved Development Program or Small Projects List) are allocated to S01 and S02 in proportion to the directly allocated assets.
2. S03C, S03D, and S10, do not include fixed assets due to their specific purpose.

B) Activity turnover

The revenue-generating accounts for the company are allocated according to the "Activity Turnover" key. This allocation key reflects the turnover of the activity in relation to the total turnover of the company (excluding income from S03C, S03D, and S10). It applies, in particular, to the allocation of accounts like receivables (e.g. from customers).

Activities S03C, S03D and S10, because they are special purpose, do not receive revenue from sharing (generally do not participate in any allocation) and do not participate in the indirect allocation. Their revenue is closely related to their purpose, i.e. for S03C and S03D the proceeds from the disposal of balancing gas and operating gas including the transfer of balancing gas and for S10 the security of supply fees and the interest on the security of the supply security account. For the purposes of calculating this key, the amounts accumulated in the revenue accounts of these activities shall not be taken into account.

C) Personnel Fees and Expenses

The accounts related to the remuneration and expenses of the company's personnel are allocated according to the "Personnel Fees and Expenses" allocation key. This allocation key relates to the level of payroll of the activity in relation to the company's total payroll. It is applied for the allocation of the balance of accounts linked to the employment of staff. This key must be determined on the basis of the salaries of the officials actually engaged in the activity and not on the basis of the salaries of the registered officials.

Activities S03C, S03D and S10, because they are special purpose, receive only the allowable costs and do not participate in the indirect allocations.

D) Net Activity Results

Accounts that are more related to the Company's net result than its Turnover can be allocated according to the "Net Activity Results" key. A typical example of the application of this key is income tax on profits at year ended. In particular, in case of loss-making activity period, the profitable ones will be burdened proportionately with the rest of the tax.

Activities S03C, S03D and S10, because they are non-profit-making, have no effect and are not involved in the indirect allocation.

TRUE TRANSLATION FROM THE ORIGINAL IN GREEK LANGUAGE

Independent Auditor's Report

To the Shareholders of the Company HELLENIC GAS TRANSMISSION SYSTEM OPERATOR S.A.,

Report on the Audit of the Financial Statements

Opinion

We have audited the accompanying financial statements of HELLENIC GAS TRANSMISSION SYSTEM OPERATOR S.A., (the Company), which comprise the statement of financial position as at December 31, 2021, and the statements of profit or loss and other comprehensive income, changes in equity and cash flow for the year then ended, as well as a summary of significant accounting policies and other explanatory notes.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Company HELLENIC GAS TRANSMISSION SYSTEM OPERATOR S.A., as of December 31, 2021, its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards as endorsed by the European Union.

Basis of Opinion

We conducted our audit in accordance with the International Standards on Auditing (ISAs) as they have been transposed in Greek Legislation. Our responsibilities under those standards are described in the "Auditor's responsibilities for the audit of the financial statements" section of our report. During our audit, we remained independent of the Company, in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) as transposed in Greek legislation and the ethical requirements relevant to the audit of the financial statements in Greece. We have fulfilled our responsibilities in accordance with the provisions of the currently enacted law and the requirements of 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 financial statements

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

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern principle of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole 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, as they have been transposed in 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 financial statements.

As part of an audit in accordance with ISAs as they have been transposed in 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 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 for one 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 internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by 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 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 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 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 financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with Management 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. Taking into consideration that Management is responsible for the preparation of the Board of Directors' Report 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 currently in force of the article 150 of Law 4548/2018 and its content is in line with the accompanying financial statements for the year ended 31.12.2021.
 - b) Based on the knowledge we obtained during our audit about the Company HELLENIC GAS TRANSMISSION SYSTEM OPERATOR S.A., and its environment, we have not identified any material inconsistencies in the Board of Directors' Report.
2. Taking into consideration that Management is responsible for the preparation of the Separated Financial Statements, which comprise the separated by activity Statement of Financial Position of the Company as at December 31, 2021, as well as the separated by activity Statement of Comprehensive Income for the period from 1 January 2021 to 31 December 2021, according to the provisions of Greek Law 4001/2011, the No. 332/2016 decision of the Regulatory Authority for Energy and the 5th Amendment of Tariff regulation approved by the Regulatory Authority for Energy (Decision No. 1434/2020), we note that, in our opinion the Separated Financial Statements, as presented in Appendix to the notes of the financial statements of the Company, have been prepared in accordance with the provisions of Greek Law 4001/2011, the No. 332/2016 decision of the Regulatory Authority for Energy and the 5th Amendment of Tariff regulation approved by the Regulatory Authority for Energy (Decision No. 1434/2020),.

Athens, 25 May 2022

The Certified Public Accountant

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