

HELLENIC GAS  
TRANSMISSION SYSTEM  
OPERATOR



# ESG REPORT

2024

# 01

## INTRODUCTION

- 1.1. CEO message
- 1.2. DESFA at a glance
- 1.3. About this report

4  
5  
8  
12

# 02

## ABOUT DESFA

- 2.1. Corporate Profile
- 2.2. Business Model and Value Chain
- 2.3. DESFA's role in Energy Transition
- 2.4. Memberships and Industry Alliances
- 2.5. Awards and Recognitions

14  
15  
20  
25  
28  
29

# 03

## SUSTAINABLE DEVELOPMENT APPROACH

- 3.1. ESG Strategy and targets
- 3.2. Sustainability Oversight
- 3.3. Stakeholder Engagement and Communication
- 3.4. Risk Management
- 3.5. Double Materiality Assessment

34  
35  
45  
47  
51  
52

# 04

## ENVIRONMENT

- 4.1. Climate Change Mitigation and Adaptation
- 4.2. Carbon Footprint and Energy
- 4.3. Biodiversity and Ecosystem Impacts
- 4.4. Supplier Environmental Impacts

58  
59  
68  
76  
80

# TABLE OF CONTENTS

# 05

## SOCIETY

- 5.1. Employment Practices and Labor Conditions
- 5.2. Socioeconomic Impact and Energy Access
- 5.3. Local Communities

82  
83  
95  
99

# 06

## GOVERNANCE

- 6.1. Corporate Governance Structure and Oversight
- 6.2. Ethics, Integrity and Business Conduct
- 6.3. Responsible Procurement
- 6.4. Cybersecurity and Data Protection

102  
103  
108  
113  
114

# 07

## PERFORMANCE DATA AND STANDARDS

- 7.1. Key ESG Performance Indicators (KPIs)
- 7.2. GRI Content Index
- 7.3. ATHEX ESG Metrics
- 7.4. SASB Metrics – Oil & Gas Midstream

116  
117  
129  
142  
145

# 08

## ANNEXES

- 8.1. Glossary

146  
147









# 01 INTRODUCTION

- 
- 1.1 CEO Message
  - 1.2 DESFA at a glance
  - 1.3 About this report



## 1.1 CEO Message

### GRI 2-22

We are pleased to present DESFA's ESG Report for 2024, reaffirming our steadfast commitment to sustainable development and transparency in our approach, performance, and future objectives. This year's report highlights our continued efforts to integrate ESG principles into our business strategy, supporting Greece's energy transition and strengthening regional energy security.

Throughout the year, we made significant progress in implementing our Ten-Year Development Plan 2024–2033 (TYDP), which includes 71 projects and €1,37 billion in investments. These initiatives aim to expand the National Natural Gas System (NNGS), enhance system flexibility, and prepare our infrastructure for the integration of renewable gases. Key developments—such as the West Macedonia High-Pressure Pipeline (HPP), the Nea Mesimvria–Evzoni–Gevgelija interconnector, and the hydrogen-ready Karperi–Komotini pipeline—reinforce Greece's position as a regional energy hub.

In parallel, we launched DESFA Solutions, a new subsidiary focused on non-regulated services, and inaugurated our Technical Training and R&D Center in Nea Messimvria, which serves as a regional hub for vocational education and innovation, while we also launched our first call for ideas through δ+ Innovation Center is DESFA's new initiative, aiming to support innovative projects in the energy sector and become the focal point for the organization's engagement with startups, research centers, and universities.

Through innovation, strategic investments, and collaboration, we continue to create long-term value for the environment, society, and the economy. Our approach to sustainable development is forward-looking and comprehensive, guided by a strong commitment to achieving net-zero emissions, conserving biodiversity, fostering social prosperity, and upholding robust governance.

### BUILDING RESILIENT INFRASTRUCTURE FOR A LOW-CARBON FUTURE

In line with our Net Zero Master Plan, we remain firmly committed to reducing our emissions by 50% in comparison with 2018 by 2030 and achieving carbon neutrality by 2040. Building on this ambition, in 2024 we not only achieved reductions in Scope 2 and Scope 3 emissions but also accelerated investments in low-carbon technologies and hydrogen-ready infrastructure.

A key milestone in this journey was the attainment of ISO 14064 certification, which reinforced our dedication to rigorous carbon footprint management and energy transparency. Complementing this achievement, we also secured the Oil & Gas Methane Partnership (OGMP) Gold Standard for Reporting, underscoring our commitment to transparency and continuous improvement in methane emissions management.

To further enable the energy transition, projects such as the Karperi–Komotini, Patras, and Nea Mesimvria–Evzoni pipelines are being developed to support the progressive integration of renewable gases into the NNGS. In parallel, we advanced the H2DRIA project and launched a pilot hydrogen injection facility at our Technical Training Center, marking important steps toward a hydrogen-ready future.



**Maria Rita Galli**  
**Chief Executive Officer (CEO)**  
Hellenic Gas Transmission  
System Operator S.A. (DESFA)

## 1.1 CEO Message

At the same time, we are embedding climate adaptation measures across our operations to ensure infrastructure resilience. This includes integrating scenario analysis, emergency planning, and predictive maintenance to safeguard system reliability and continuity. Moreover, we continue to implement the European Union (EU) Emissions Trading System at our installations, using it as a strategic tool to manage climate transition risks and ensure regulatory compliance.

In addition, we have strengthened environmental oversight across our supply chain by introducing enhanced contractor screening and establishing a monthly environmental reporting framework. These initiatives not only promote low-emission technologies but also foster collaboration with suppliers in joint decarbonization efforts.

Through these combined actions, DESFA is positioning itself as a strategic enabler of Greece's and Europe's low-carbon future—unlocking new opportunities for growth, investment, and resilience.

### EMPOWERING OUR EMPLOYEES AND COMMUNITIES

In 2024, we further strengthened our commitment to inclusive employment and local empowerment, while maintaining a strong focus on health, safety, and wellbeing across all operations. DESFA's workforce grew to 617 employees, with 35% of managerial roles held by women, and 16% of senior management positions at key operational sites held by individuals from local communities.

We also focused on continuous training and development, responding to emerging needs and trends to ensure high levels of expertise across our teams. Through our Technical Training and R&D Center in Nea Messimvria—serving as a regional hub for vocational education and innovation—we are not only enhancing internal capabilities but also contributing to sector-wide knowledge transfer and the energy transition.

Further, we implemented the “Care to Protect” initiative, promoting and ensuring the application of Life Saving Rules to foster a strong safety culture across all operations. Our physical security and competence management systems continue to safeguard operational integrity and resilience.

We also deepened our engagement with local communities through targeted Corporate Social Responsibility (CSR) actions. We supported education and social care, including the renovation of school facilities, donations to vulnerable groups, and health initiatives such as breast cancer awareness and the provision of medical equipment for remote communities. We also continued our efforts to combat food poverty, organizing 15 meal distributions across the country, engaging 400 volunteers and distributing thousands of food portions. Our employees contributed over 1.500 hours of voluntary work, reflecting our culture of care and solidarity.







## 1.1 CEO Message

### EMBEDDING INTEGRITY IN OUR ACTIVITIES

Our commitment to integrity is embedded across all levels of the organization, supported by robust policies, certified systems, and continuous improvement initiatives. In 2024, we continued to strengthen our governance framework, ensuring that ethical conduct, transparency, and regulatory compliance remain central to our operations.

We intensified efforts to mitigate corruption risks and promote ethical behavior through the implementation of our Anti-Corruption Policy and the ISO 37001:2016-certified Anti-Bribery Management System. These policies are actively communicated to employees, vendors, and third parties, reinforcing our zero-tolerance approach to unethical conduct.

DESFA also advanced its data protection and cybersecurity practices. Building on the principles of Privacy by Design and by Default, we expanded our Data Processing Agreements and introduced new awareness tools to strengthen our data governance culture. Our Risk, Compliance & Information Security Division achieved notable milestones, including the integration of business continuity and information security protocols, supported by our first certifications in ISO/IEC 27001:2022 and ISO 22301:2019, covering key operational areas.

In parallel, we strengthened our responsible procurement practices, ensuring that ethical standards and ESG principles are embedded across our supply chain. The majority of vendors and contractors formally committed to our Code of Ethics and anti-corruption policies, while all contractors demonstrated alignment with our QHSE Management System Standards—reflecting our commitment to integrity, accountability, and sustainable business partnerships.

### LOOKING AHEAD

We will deepen our engagement with stakeholders and accelerate actions that drive a just and inclusive energy transition. By prioritizing resilience, digitalization, and responsible growth, we aim to strengthen our role as a trusted partner in shaping a sustainable energy future—one that delivers shared value, safeguards resources, and supports the prosperity of communities for generations to come.

**Maria Rita Galli**

**Chief Executive Officer (CEO)**

*Hellenic Gas Transmission System Operator S.A.(DESFA)*

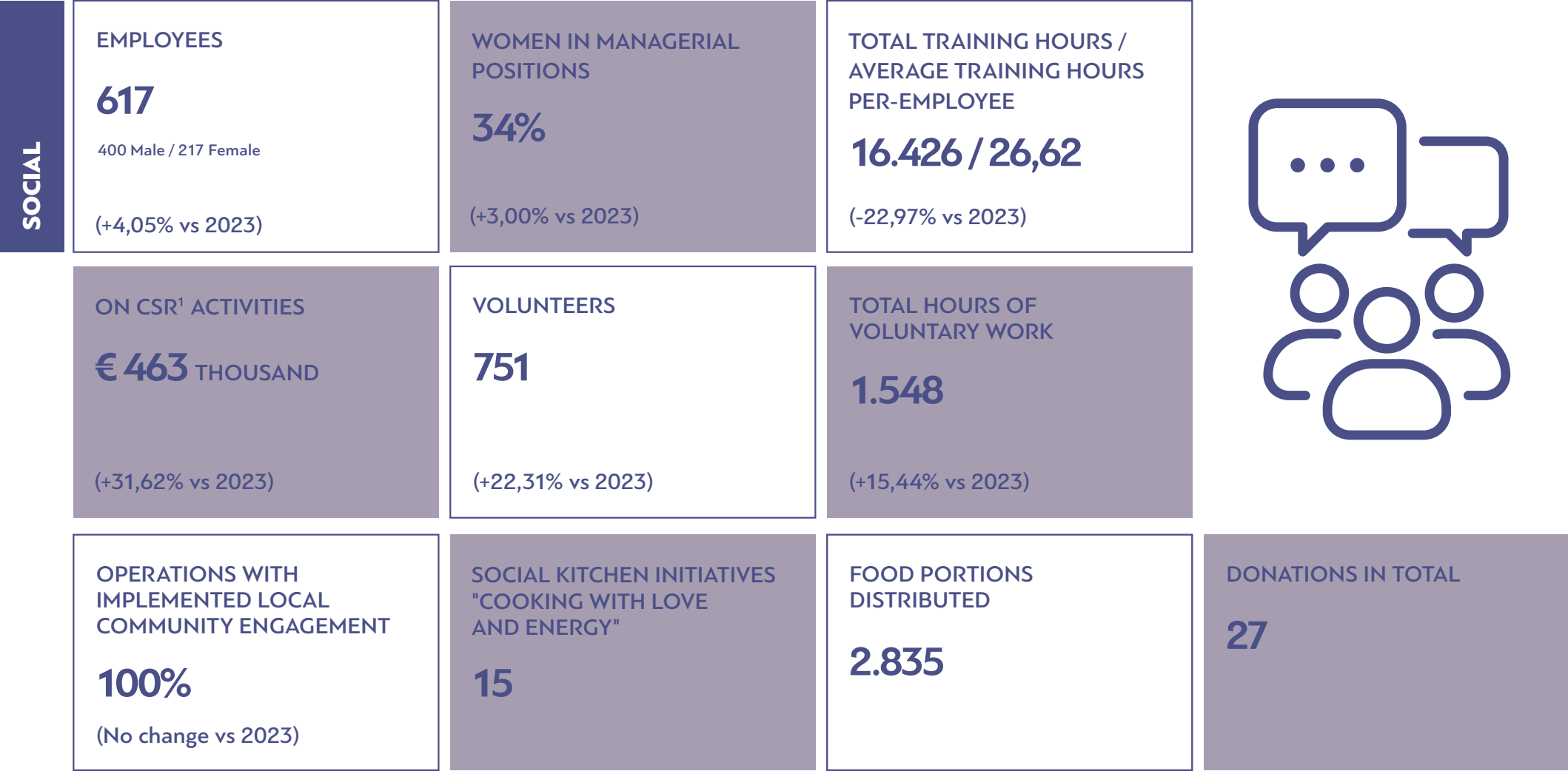
1.2 DESFA at a glance

ENVIRONMENTAL	<div>CO<sub>2</sub>e EMISSIONS</div> <div>69.331 tCO<sub>2</sub>e</div> <div>Scope 1 emissions</div> <div>(+161,43% vs 2023)</div>	<div>11.700 tCO<sub>2</sub>e</div> <div>Scope 2 location-based emissions</div> <div>(-48,04% vs 2023)</div> <div>8.654 tCO<sub>2</sub>e</div> <div>Scope 2 market-based emissions</div> <div>(-47,30% vs 2023)</div>	<div>62.908 tCO<sub>2</sub>e</div> <div>Scope 3 emissions</div> <div>(-46,21% vs 2023)</div>
	<div>ENERGY CONSUMPTION</div> <div>1.335.138.682 MJ</div> <div>370.872 MWh</div> <div>(+144,55% vs 2023)</div>	<div>TREE PLANTING</div> <div>4</div>	<div>BEACH &amp; STREAM CLEAN UPS</div> <div>6</div>
	<div>TREES PLANTED</div> <div>2.000</div>	<div>LITERS OF WASTE CLEANED IN TOTAL</div> <div>8.220</div>	<div>LITERS OF FLAMMABLE MATERIAL COLLECTED</div> <div>12.770</div>





## 1.2 DESFA at a glance



<sup>1</sup> CSR stands for Corporate Social Responsibility.

1.2 DESFA at a glance

GOVERNANCE & FINANCIAL	<div>REVENUES<sup>2</sup></div> <div>€ 357.016 THOUSAND</div> <div>(-40,29% vs 2023)</div>	<div>DISTRIBUTED VALUE<sup>3</sup></div> <div>€ 199.296 THOUSAND</div> <div>(-48,46% vs 2023)</div>	<div>NATIONAL NATURAL GAS SYSTEM DEVELOPMENT PROGRAM 2024-2033</div> <div>€ 1,37 BN / 71 PROJECTS</div>
	<div>2024 TRANSMISSION &amp; LNG SERVICES REVENUES RATIO</div> <div>79% / 21%</div> <div>(No change vs 2023)</div>	<div>OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION</div> <div>100%</div> <div>(No change vs 2023)</div>	<div>VALUE AND PERCENTAGE OF PURCHASES FROM LOCAL SUPPLIERS<sup>4</sup></div> <div>€ 50.473 THOUSAND (39,49%)</div> <div>(-62,08% vs 2023)</div>
	<div>0 SUBSTANTIATED COMPLAINTS REGARDING BREACHES OF CUSTOMER PRIVACY OR LOSSES OF CUSTOMER DATA (No change vs 2023)</div>		

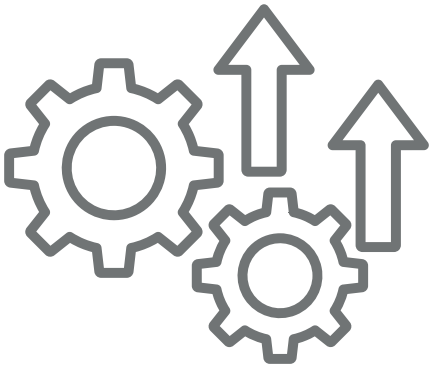


<sup>2</sup> Further details on revenues can be found in Unit 7.1 "Key ESG Performance Indicators (KPIs)," on page 125.  
<sup>3</sup> Distributed value consists of operating costs, employee wages and benefits, payments to the government and providers of capital and community investments. Further details on distributed value can be found in Unit 7.1 "Key ESG Performance Indicators (KPIs)," on page 125.  
<sup>4</sup> DESFA's geographical definition of "local" refers to regions of Greece, specifically Central Greece, Peloponnese, Thessaly, Macedonia, and Thrace, and is closely related to the facilities of the Purchase Requisition/Demand. Therefore, DESFA considers local suppliers as those based within the demand regions, and non-local suppliers as those based outside the demand regions.



1.2 DESFA at a glance

OPERATIVE	METRIC TON-KILOMETERS OF NATURAL GAS	PHYSICAL OFF-TAKES TO POWER PRODUCERS	LNG STORAGE CAPACITY
	1.253,47	65,77%	225.000 m <sup>3</sup>
	(+113,14% vs 2023)	(+2,76% vs 2023)	



## 1.3 About this report

GRI 2-2, GRI 2-3, GRI 2-5  
A-G5

This is DESFA's, the Hellenic Gas Transmission System Operator, ESG Report for 2024 based on international standards for non-financial reporting, presenting information regarding the management approach and the performance on material sustainability topics relevant to DESFA business activities in Greece (which constitutes the significant location of operations) during the period of 01.01.2024-31.12.2024, aligned with its financial reporting period.

The Report aims to inform stakeholders of the impacts that DESFA creates or may create on the environment, people, and the economy, as well as to form a basis for comparing the performance of DESFA in sustainability matters for the coming years.

The scope of this report is limited to DESFA activities and does not include information for any other affiliated Company. It has been prepared in accordance with the GRI Standards 2021<sup>5</sup> and GRI 11 Oil and Gas Sector 2021, the updated Athens Stock Exchange (ATHEX) ESG Reporting Guide 2024 and the Sustainability Accounting Standards Board (SASB) Standard «Oil and Gas - Midstream 2018».

The report also presents the impacts of the Company in the context of the Sustainable Development Goals of the United Nations (UN SDGs).

DESFA has not proceeded with external assurance for the content of this report. However, it considers the possibility of receiving external assurance in future reports.

DESFA considers that the opinion of each reader on the content of the ESG Report is essential for constructive dialogue as well as corporate growth. For this purpose, you can send your comments and/or any queries to the following contact details:

**Natasha Chatziantoniou**  
**Communications & CSR Senior Manager**  
T: +30 213 088 4058, M: +30 6958 463 607  
a.chatziantoniou@desfa.gr  
357-359, Messogion Avenue  
152 31, Chalandri, Attica, Greece.

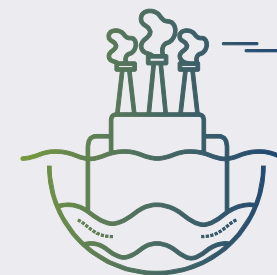
<sup>5</sup> DESFA has reported in accordance with the GRI Standards for the period 01.01.2024-31.12.2024.

### Coordinating Division:

- Corporate Affairs, ESG & Communication

### Participating Divisions:

- Asset Development
- Asset Management
- Commercial Services
- Finance
- HSSEQ
- Human Resources & Organization
- Information and Communications Technology (ICT) and Facilities & Fleet Management
- Legal Affairs & Governance
- Risks, Compliance & Information Security
- Strategy & Development
- Supply Chain
- CEO Office, Equity participation & Non Regulated Services









An aerial photograph of an industrial facility, likely a refinery or petrochemical plant, featuring large circular storage tanks and complex piping. In the background, a large oil tanker ship is visible on the sea. The image is overlaid with a green gradient on the left side where the text is located.

# 02 ABOUT DESFA

- 
- 2.1 Corporate Profile
  - 2.2 Business Model and Value Chain
  - 2.3 DESFA's role in Energy Transition
  - 2.4 Memberships and Industry Alliances
  - 2.5 Awards and Recognitions



## 2.1 Corporate Profile

### GRI 2-1

DESFA, the Hellenic Gas Transmission System Operator was founded on 30 March 2007, in accordance with the provisions of law 3428/2005 (Government Gazette-HGG 313/27.12.2005) on the liberalization of the natural gas market, which aligned Greek legislation with the European Directive 2003/55/EC.

DESFA, as the Operator of the Greek NNGS, operates and develops with safety and innovation a wide network of modern infrastructure throughout the country, while daily paving the way for a greener future. A trusted energy partner in Southeast Europe and beyond, making a significant contribution to the security and diversification of supply in Greece and the wider region.

With significant experience and highly qualified staff, DESFA makes a decisive contribution to energy security and the diversification of supply sources in Greece and the wider region, positioning the country as an energy gateway for the whole of Europe. The Company strengthens the competitiveness and extroversion of the Greek economy, having been established as a reliable partner in the development, operation, and management of gas infrastructure in Southeast Europe and beyond.

At the same time, DESFA is leading the energy transition, investing in a sustainable and innovative energy network, with the goal of achieving carbon neutrality by 2040. The Company is evolving every day, working towards the faster integration of renewable gases, with a focus on hydrogen and biomethane, as well as promoting cutting edge energy solutions in the midstream sector such as transport and liquefaction of CO<sub>2</sub> within the context of Carbon Capture and Storage (CCS) value chain.

Guided by its values, integrity, excellence & leadership, collaboration, as well as sustainability and innovation, DESFA remains true to our vision of the safe operation and development of a technologically advanced transmission and temporary storage network of clean, reliable and affordable gas energy operators, creating added value in the Greek economy and the societies where it operates and shaping a brighter, more sustainable future for everyone.

### SHAREHOLDING STRUCTURE

DESFA is jointly owned, with 34% of shares held by the Greek State and 66% by Senfluga SA, a consortium comprising Snam, Enagás, Fluxys, and DAMCO. This ownership structure ensures a balanced partnership between public and private stakeholders, supporting the company's mission to enhance energy security while driving sustainable energy solutions.

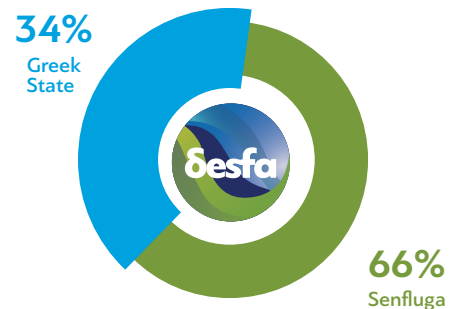


CHART 1: OWNERSHIP STATUS



## 2.1 Corporate Profile

### MISSION, VISION AND VALUES

DESFA is the warrantor of the proper functioning of the NNGS, enhancing competitiveness and extroversion and improving life quality, while leading the energy transition to achieve carbon neutrality by 2040 via its innovative sustainable energy network.

### MISSION

As a reliable gas infrastructures partner in Southeast Europe & beyond, DESFA is constantly evolving its system paving the way to new carbon-neutral energy routes.

The Company generates added value to the environment, society, corporate governance, its people, and the communities, where it operates, fostering a diverse and inclusive organization that attracts talent and innovative ideas that create new opportunities for the country.

### VISION

The Company's vision is to safely operate and develop a technologically advanced multi molecules network, which transmits and stores clean, reliable, and affordable gas energy carriers.

DESFA is committed to maintain and significantly strengthen its role as a pillar of energy stability in Greece and Southeast Europe. Placing Greece as a gateway for diversified gas energy imports, the Company develops the Greek renewable gases network (e.g. hydrogen, biomethane), paving new energy ways, and the carbon dioxide value chain, enabling after its efficient capture, transportation, liquefaction and shipping to a storage site.

### VALUES

DESFA operates based on clearly identified values, ensuring that all DESFA employees are working towards the same goals, supporting the Company's mission, and shaping our corporate culture.







## 2.1 Corporate Profile

### VALUES

#### FOCUS ON INTEGRITY



The Company's outmost priority is the **Health and Safety** of its employees and users, guaranteeing **the security of our infrastructures** and acting for the mitigation of operational risks in Greece and the wider Southeast European region. In conducting business, DESFA is inspired by and complies with the principles of **fairness, efficiency, honesty, transparency**, and impartiality in all its business partnerships, having adopted a **zero - tolerance approach** to any form of corruption.

#### PROMOTE EXCELLENCE & LEADERSHIP



DESFA's aim is for all its employees to be **proud** of the work they do and the Company they work for. It promotes a culture of **continuous improvement**, through the **empowerment** of all its people to excel themselves and seek opportunities for the enhancement of its operation and services. The Company continuously redefines the standard of **excellence** in every aspect of our business operation and culture, developing the leaders of the future energy market.

#### EMPOWER COLLABORATION



The Company believes in the power of working together, building, and encouraging collaboration across teams for the achievement of our shared objectives and the internal dissemination of knowledge, information, and technical know-how, fostering innovation and leading the way to energy transition.

#### INVEST IN SUSTAINABILITY & INNOVATION



DESFA is committed to **incorporate ESG (Environment, Society and Governance) factors in its business model**, focusing on those with a high impact on the climate and the **environment** towards **net-zero emissions**. The Company fosters innovation to pursue a sustainable energy system and to promote the protection of natural resources, ensuring an environmentally safe operation for the societies where it operates.

## 2.1 Corporate Profile

### HISTORY AND MILESTONES

#### 2024

- > Hydrogen Backbone (Greece–Bulgaria, 540 km): Secured EU financial support under the CEF for the (FEED) Phase (January 2025).
- > Approval of the TYDP 2024 – 2033 by RAEWW which includes approximately €1,37 billion of investments (March).
- > Market Test in coordination with the Vertical Corridor initiative, promoted with other Transmission System Operators (TSOs) of South and Eastern Europe, to increase gas throughput from Greece to South East Europe (SEE) / Central and Eastern Europe (CEE) region (June).
- > Completion of voluntary Stakeholder Engagement Activities for the environmental permitting of Karperi-Komotini HPP (June).
- > Operationalization of the 1<sup>st</sup> remote LNG Facility in Aspros (July).
- > Completion of statutory public disclosure of the Environmental Impact Assessment (EIA) for the project “Construction and Operation of Patra HPP (August).
- > Launch of Technical Training Centre in Nea Messimvria (September).
- > Entry into operations of the Amfitriti Metering Regulating (M/R) station, connecting the Alexandroupolis Floating Storage Regasification Unit (FSRU)—participated by DESFA at 20% and operational from October 2024 - to DESFA's grid and the IP with the ICGB pipeline (October).
- > Signing of the second Commercial Bond Loan (Queen) of € 810 million with the four Greek systemic banks including a 15-year tenor and a 1% fixed interest rate, € 261 million portion under the Recovery and Resilience Fund scheme (October).
- > CO<sub>2</sub> Logistic Solution (Greece – ApolloCO<sub>2</sub> Hub): Achieved STEP Seal recognition from the Innovation Fund for the Liquefaction and Export Terminal (ApolloCO<sub>2</sub>-LT), (October).
- > Founding member of the newly funded European Network of Network Operators for Hydrogen (ENNOH) supporting cooperation among anticipated Hydrogen Network Operators (December).
- > Establishment of DESFA Solutions, a fully owned subsidiary for the provision of non-regulated services (December).
- > 100% ex post socialization of LNG terminal of Revithoussa.
- > Significant progress in ongoing projects, including the West Macedonia pipeline, Ambelia, and Komotini Compressor Stations.

Since the establishment of DESFA in 2007, the Company has achieved important milestones in promoting the use of natural gas in the Greek market, expanding its network and achieving significant market goals that have strengthened the Company, to date, while paving the way for even greater achievements in the future.

#### 2023

- > Progress was made on critical projects, including the Connection with the FSRU of Alexandroupolis, the two new Compressor Stations at Komotini and Ampelia and the HPP to West Macedonia.
- > Inauguration event for the beginning of the construction works for the West Macedonia HPP (February).
- > Completion and start of operation of the first LNG Truck Loading Station at Revithoussa, Greece (March).
- > Approval of the Net Zero Targets by DESFA's Board of Directors, committing to reduce Scope 1 & 2 (market based) emissions by 50% by 2030 in comparison to 2018 levels and achieve Carbon Neutrality by 2040 (June).
- > Final Investment Decision (FID) of the new Investment of the Pipeline Nea Messimvria – Evzoni/Gevgelija and its Metering Station, to interconnect the NNGS with North Macedonia (July).
- > A contract has been awarded from Nomagas for the contract administration and supervision of the construction of the Northern Macedonian part of the project (September).
- > Integrated CO<sub>2</sub> logistic solution in Greece, in conjunction with Energear's sequestration project in Prinos, became the first Carbon Capture, Utilization & Storage (CCUS) Projects of Common Interest (PCI) development in the SE Europe (October).
- > The new TYDP 2023-2032 was approved by RAAEYW, with planned Capital Expenditure (CapEx) of approximately EUR € 1,3 billion (October).
- > Inclusion of the hydrogen infrastructure project, to connect Greece with Bulgaria, in the 6<sup>th</sup> PCI list (October).
- > Publication of DESFA's ESG Report 2022 (November).
- > “Hydrogen Networks: Transforming Vision into Action” conference, dedicated to hydrogen, organized and hosted by DESFA (November).
- > Commercial operation of the 3<sup>rd</sup> Compressor Unit of Nea Messimvria achieved (November).
- > Renewed OGMP Gold Standard certification for Methane Emission and excellent results for safety in the workplace (December).
- > Certification with ISO 37001:2016 for Anti-Bribery Management System (December).
- > Certification with ISO 50001:2018 for Energy Management System (December).

#### 2022

- > FID for the FSRU project in Alexandroupolis (January).
- > DESFA-HENEX Gas Trading Platform inauguration (March).
- > Update of the Tendering & Agreement & Contract Management Procedures (March).
- > Completion of the familiarization phase of the Operations & Maintenance (O&M) project in Kuwait in April, and receipt of first grant installment for the HORIZON 24/7 Zen Program on H<sub>2</sub> (May).
- > Installation of a temporary Floating Storage Unit (FSU) in Revithoussa to increase the LNG storage capacity to 370.000m<sup>3</sup> of LNG, to restore the energy crisis (June).
- > Building up the “Greek Hydrogen Value Chain” conference, organized and hosted by DESFA (July).
- > Launching of Market Test for capacity booking for the natural gas Interconnection between Greece and North Macedonia (July).
- > Approval of the Vendors Qualification Procedure (September).
- > Inauguration of LNG Truck Loading Station in Revithoussa (October).
- > Approval of the Sustainability Policy (October).
- > Certification with ISO 17969 for the Competency Management System (November).
- > Completion of H<sub>2</sub> Readiness assessment of existing gas network for H<sub>2</sub> blend up to 10% (November).
- > FID of new Compressor Station in Komotini (November).
- > Approval of the H<sub>2</sub> Master Plan from the Board (December).
- > Participation in the closed consultation organized by the Ministry of Energy on the upcoming Biomethane Policy and submission of comments (December).

#### 2021

- > Commencement of the familiarization phase of the O&M project in Kuwait (May).
- > Adoption of the Data Protection Framework (June<sup>6</sup>).
- > Revisiting corporate mission, vision & values (July).
- > Logo rebranding, to reflect the evolution of DESFA to date, the new energy landscape and the Company's vision for the future (September).
- > New ESG Strategy integrating ESG factors into its business strategy and the overall value chain (October).
- > Conclusion of the acquisition of a 20% stake in Gastrade S.A., the Company that develops “ASFA ALEXANDROUPOLIS” the Floating Storage and Regasification Unit of LNG in Alexandroupolis (December).
- > Completion of the Construction of the temporary M/R city gate station at the area of Megalopolis (December).

## 2018

- > The Upgrade of the System of Fixed Communication (FTS) of NNGS has been completed (January).
- > The 2<sup>nd</sup> upgrade of the Border Metering Station in Sidirokastro has been completed (February).
- > Certification with ISO 45001:2018 for the Health & Safety Management System (June).
- > Participation as a shareholder (7%) in the Hellenic Energy Exchange (HEEx) (June).
- > Inauguration of the 3<sup>rd</sup> LNG Tank on the Terminal (November).
- > Certification of DESFA as an Ownership Unbundled Operator under the 3<sup>rd</sup> EU Energy Package (December).
- > Change in the ownership structure (shareholding structure) (December).
- > One of the most critical projects, the 2<sup>nd</sup> upgrading phase of Revithoussa's Terminal was completed (December).

## 2019

- > Corporate & digital transformation<sup>7</sup>.

## 2020

- > DESFA was awarded the O&M of the new LNG terminal of the state-owned Kuwait Company, Kuwait Integrated Petroleum Industries Company (KIPIC), in Al-Zour in 2020 (May).
- > Approval of the Anticorruption Policy, Whistleblowing Policy and revised Code of Ethics (November).
- > The TAP-DESFA interconnection point at Nea Mesimvria has become operational (December).

## 2016

- > Construction of the Farsala M/R Station has been completed enabling access to the network for new users (November).

## 2014

- > Two new M/R stations became operable for the supply of the areas of Karditsa and Trikala (April – May).
- > The reverse physical flow through the Sidirokastro Border Metering Station in Sidirokastro has been achieved, enabling the export of natural gas quantities from NNGS to Bulgaria (May).
- > Certification of DESFA as an Independent Transmission Operator under the 3<sup>rd</sup> EU Energy Package (September).

## 2013

- > The Agioi Theodoroi Corinth M/R Station has been completed (January).

## 2012

- > The construction of the pipeline from the NNGS line valve station "STEFANI" to the new PPC Power Plant at Aliveri, Evia, has been completed (November).
- > The operation of the new Compressor Station in Nea Mesimvria officially commenced (December).

## 2008

- > The project of the pipeline expansion of the NNGS to Corinth was completed (April).
- > Certification with OSHA 18001 for Health & Safety Management System (June).
- > The project of expansion of the NNGS to west Thessaly was completed (November).

## 2009

- > The strategic role of the LNG Terminal was further enhanced by the completion of construction and the operation of the High-efficiency Cogeneration Unit of 13MW capacity that uses natural gas as fuel (April).
- > Certification with ISO 14001 for Environmental Management System (EMS) (June).
- > Certification with ISO 9001 for Quality Management System (September).

## 2010

- > The Mavromati – Thisvi pipeline has been completed (March).
- > The Certification of the Beneficiary's Administrative Capacity of co-funded projects has been issued after the successful evaluation by the Managing Authority of the Ministry of Finance and Competition (April).
- > Accreditation of DESA's Laboratory Management System with ISO 17025 (May).
- > The project management environment of DESFA is fully operational (December).

## 2007

- > DESFA is founded as a subsidiary Company owned in its entirety by DEPA S.A., with the transfer of the sector of the NNGS from DEPA S.A. to DESFA S.A. by means of a spin-off (March).
- > The operation of the Greek –Turkish interconnection pipeline has been commenced (November).

## 2000

- > The construction of the LNG storage and gasification facility on the island of Revithoussa has been completed.

## 1996

- > The construction of the natural gas transmission pipeline from the Greek-Bulgarian border to Attica and the Sidirokastro Border Measuring Station has been completed.

<sup>6</sup> The Data Protection Framework was adopted in different phases: Data Protection Policy (Jun. 2021), Consent Management Process (Jul. 2021), Data Subject Request Management Process (Jul. 2021), Data Protection Impact Assessment Process (Jul. 2021), Data Breach Management Process (Oct. 2021), Data Protection by Design and by Default Operating Instructions (Jun. 2022).

<sup>7</sup> DESFA has developed a business and digital transformation plan is focused on four key objectives: a) Organization Design, b) Business Process Reengineering, c) Operating Model Review and Redesign d) ICT Service Model Definition.



## 2.2 Business Model and Value Chain

### LEGAL FRAMEWORK

DESFA operates within a robust regulatory framework that ensures transparency, reliability, and compliance with both European and national legislation. As the operator of the NNGS and the LNG Terminal, DESFA applies the provisions of the EU legislative framework, including the Regulation (EU) 2024/1789 of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen, amending Regulations (EU) No 1227/2011, (EU) 2017/1938, (EU) 2019/942 and (EU) 2022/869 and Decision (EU) 2017/684 and repealing Regulation (EC) No 715/2009 (recast), which sets the conditions for access to natural gas transmission networks across Europe.

At the national level, DESFA's activities are primarily governed by Law 4001/2011, which incorporates the relevant EU legislation into Greek law. This legislation defines the rules for the transmission of natural gas and the operation of LNG facilities, both of which are considered activities of public interest. It also establishes the principles for third-party access to the transmission network and LNG terminal, as well as the methodology for setting tariffs.

The Regulatory Authority for Energy, Waste and Water (RAAEY) closely monitors these activities, ensuring that DESFA operates in a fair, transparent, and non-discriminatory manner. In addition, specific operational aspects are detailed in the NNGS Network Code and Tariff Regulation, which regulate the operation, maintenance, and development of the system, as well as the methodology for the calculation of tariffs. Through this framework, DESFA guarantees compliance with European standards while safeguarding the interests of all stakeholders.



### OUR SERVICES AND MARKETS

#### GRI 2-6 A-G1

DESFA operates, maintains and develops the Greek Natural Gas System in a safe, reliable and economically efficient way, by providing:

#### 1. Regulated Services in a transparent and non-discriminatory way, such as:

- Transmission Services
- LNG Services
- LNG Truck Loading Services (TLS)
- Additional LNG Services
- Non-transmission Services (Metrology, Odorization, Supplementary Services)

#### 2. Non Regulated Services for various national and international clients, such as:

- Operation & Maintenance Services
- Supervision, Project Management and Control Services (Engineering)
- Consulting & Training Services
- Certification Services

Further information regarding the provided services are available on the Company's website [www.desfa.gr](http://www.desfa.gr).



## 2.2 Business Model and Value Chain

### INFRASTRUCTURE

The NNGS transports Natural Gas from the upstream Interconnected Natural Gas Transmission Systems of Bulgaria and Turkey, the Trans Adriatic Pipeline (TAP) and from the LNG terminal, which is located on the island of Revithoussa in the gulf of Megara, as well as from distribution networks.

Natural gas is delivered, from five entry points through the NNGS to Transmission and/or LNG Users in 51 exit points in the Greek mainland. Additionally, at the exit point of Sidirokastro, gas quantities can be delivered to the Interconnected Natural Gas Transmission System of Bulgaria with reverse gas flow.

#### The NNGS consists of:

- **Main Pipeline and Gas Transmission Branches:** with a length of 512 km and a diameter of 36" & 30" and the branches with a length of 954,16 km (containing the underwater pipeline of the Aliveri branch, with a length of 14,20 Km and a diameter of 20" and the two underwater pipelines, each one a back-up to the other, with a diameter of 24" and a length of 620 m and 630 m, connecting the Revithoussa LNG Terminal to the mainland), which connect different areas of the country to the main pipeline.
- **Compressor Station:** Strategically located along the pipeline, compression stations maintain the necessary pressure levels for uninterrupted gas flow. These stations are critical for optimizing transmission efficiency and ensuring system resilience, especially over long distances and varying terrains.
- **Metering and Regulating Stations at Entry–Exit Points:** These stations ensure accurate measurement and control of gas volumes entering and exiting the system. They play a vital role in maintaining transparency, regulatory compliance, and operational safety, while also facilitating fair access for market participants.
- **Gas Control and Dispatching Centers:** Located in Patima Elefsina and Nea Mesimvria Thessaloniki, these centers serve as the nerve hubs of the NNGS. They oversee real-time monitoring, coordination, and management of gas flows, enabling rapid response to operational needs and emergencies.
- **Remote Control System & Telecommunications:** This digital infrastructure enhances the system's automation and connectivity. It allows for centralized supervision, data collection, and remote operation of critical assets, contributing to improved efficiency, safety, and predictive maintenance capabilities.
- **Operation and Maintenance Centers:** Distributed across South, Central, North, and North-East Greece, these centers ensure the ongoing reliability and integrity of the transmission system. They support routine inspections, emergency interventions, and infrastructure upgrades, reinforcing DESFA's commitment to sustainable and uninterrupted energy supply.



FIGURE 1: HIGH-PRESSURE NATURAL GAS TRANSPORTATION NETWORK MAP



## 2.2 Business Model and Value Chain

### LNG FACILITY

The Revithoussa LNG Terminal is one of the most important energy infrastructures of the country and the wider region of Southeast Europe. Designed and built in 1999, according to the best international standards, the Terminal successfully expanded in 2007 (1<sup>st</sup> upgrade) and later in 2018 (2<sup>nd</sup> upgrade) with the construction of the third LNG tank, increasing the total LNG storage capacity to 225.000 m<sup>3</sup> LNG, as well as increasing of LNG regasification rate up to 1.400 m<sup>3</sup>/h.

The Terminal uses the most environmentally friendly technology and operates in accordance with the strictest safety regulations. In particular, the Terminal is subject to the requirements of the Seveso III Directive, which provides for the highest safety standards, the application of which is constantly verified and certified by independent operators. It is also covered by Directive 2010/75 (e.g., regarding air pollution, sea temperature and waste), and applies all the required Best Available Techniques.

The Terminal is an important energy asset for Greece, providing security of energy supply, operational flexibility in the transmission system and increased capacity to meet peak gas demand. The Revithoussa LNG Terminal is the only facility in the NNGS, which following its second expansion, can now temporarily store Natural Gas volumes up to 225.000 m<sup>3</sup> LNG (excluding the FSU at Revithoussa). It consists of:

- Three Liquefied Natural Gas storage tanks of 65.000 m<sup>3</sup>, 65.000 m<sup>3</sup> and 95.000 m<sup>3</sup> LNG storage capacity.
- LNG offloading installations with a maximum LNG offloading rate of 7.250 m<sup>3</sup> LNG/h.
- LNG gasification installations with a maximum sustained output of 1.400 m<sup>3</sup> LNG/h.



Value chain and business relationships

GRI 2-6

A-G1

UPSTREAM	
<b>Construction</b> <ul style="list-style-type: none"> <li>• Building completion and finishing</li> <li>• Construction of buildings</li> <li>• Construction of other civil engineering projects</li> </ul>	<b>Manufacturing of capital goods</b> <ul style="list-style-type: none"> <li>• Installation of industrial machinery and equipment</li> <li>• Manufacture of basic chemicals</li> <li>• Manufacture of basic iron and steel</li> <li>• Manufacture of special-purpose machinery</li> <li>• Printing and service activities related to printing</li> </ul>
<b>Utilities</b> <ul style="list-style-type: none"> <li>• Water supply/Sewerage</li> <li>• Wholesale of solid, liquid and gaseous fuels and related products</li> <li>• Electric power generation, transmission and distribution - fossil fuel energy production</li> </ul>	<b>Services</b> <ul style="list-style-type: none"> <li>• Professional Scientific and Technical Activities</li> <li>• Information and Communication</li> <li>• Financial &amp; insurance activities</li> <li>• Administrative &amp; support service activities</li> <li>• Education</li> <li>• Waste Management and Remediation Activities</li> </ul>
OWN OPERATIONS	
<b>Regulated Services</b> <ul style="list-style-type: none"> <li>• Transmission Services</li> <li>• LNG Services</li> <li>• LNG Truck Loading Service (TLS)</li> <li>• Additional LNG Services</li> <li>• Non-transmission Services (Metrology, Odorization, Supplementary Services)</li> </ul>	<b>Non Regulated Services</b> <ul style="list-style-type: none"> <li>• Operation &amp; Maintenance Services</li> <li>• Supervision, Project Management and Control Services (Engineering)</li> <li>• Consulting &amp; Training Services</li> <li>• Certification Services</li> </ul>
DOWNSTREAM	
<ul style="list-style-type: none"> <li>• Wholesale Energy Suppliers</li> <li>• Power Producers</li> <li>• Large Industrial Consumers</li> <li>• Energy Retailers</li> <li>• Natural Gas Traders</li> <li>• Distribution companies</li> <li>• Cogeneration of electricity and heat</li> </ul>	<ul style="list-style-type: none"> <li>• District heating</li> <li>• Production of building materials</li> <li>• Oil refining</li> <li>• Greenhouse cultivation</li> <li>• Fertilizer production</li> <li>• Provision of laboratory services</li> </ul>



## 2.2 Business Model and Value Chain

### CLIENTELE

DESFA serves a broad and diversified portfolio of Customers, reflecting its pivotal role in Greece's energy ecosystem and beyond and its contribution to regional energy security. The Company's clientele includes power producers, large industrial consumers and distribution companies, as well as other TSOs and LNG terminal stations. Through its extensive infrastructure and services, DESFA ensures the safe and reliable transportation and regasification of natural gas, thereby supporting the competitiveness of the Greek economy and facilitating the energy transition.

By providing access to the NNGS and the Revithoussa LNG Terminal under transparent and non-discriminatory conditions, DESFA promotes market liberalization, liquidity, and fair competition among market participants. This approach consolidates Greece's position as a key energy hub in Southeast Europe and underscores DESFA's strategic importance in meeting national and regional energy needs.

Customer-centricity is a cornerstone of DESFA's growth and strategy. The Company implements structured processes and proactive initiatives to enhance customer experience and satisfaction. These include comprehensive feedback mechanisms, personalized engagement, and informative events designed to foster transparency and collaboration.

A robust Customer Satisfaction framework is in place, incorporating tailored surveys for different customer segments, including Transmission, LNG & TLS Users as well as Non-Transmission Services Customers. Insights from these surveys feed into the Annual Customer Feedback Report, which monitors key performance indicators aligned with ESG objectives and identifies areas for improvement. In 2024, the response rate to satisfaction surveys reached 88%, with an overall satisfaction score of 92%.

Direct engagement is further strengthened through annual one-to-one meetings, enabling NNGS Users to share feedback and discuss their short-, medium-, and long-term priorities.

In 2024, DESFA held such meetings with 85% of its active NNGS Users. Additionally, the Company organizes events such as the Annual Shippers Day and thematic workshops to keep stakeholders informed about new projects, market tests, and service developments. During 2024, DESFA hosted five events—two hybrid, one physical, and two virtual—covering key topics such as the Market Test for the Expansion of the NNGS, the Vertical Corridor Initiative, and the Call of Interest for the Hydrogen Market in Greece and Bulgaria.

These initiatives demonstrate DESFA's commitment to building strong, trust-based relationships with its customers and supporting the energy transition through open dialogue, innovation, and high-quality service delivery.

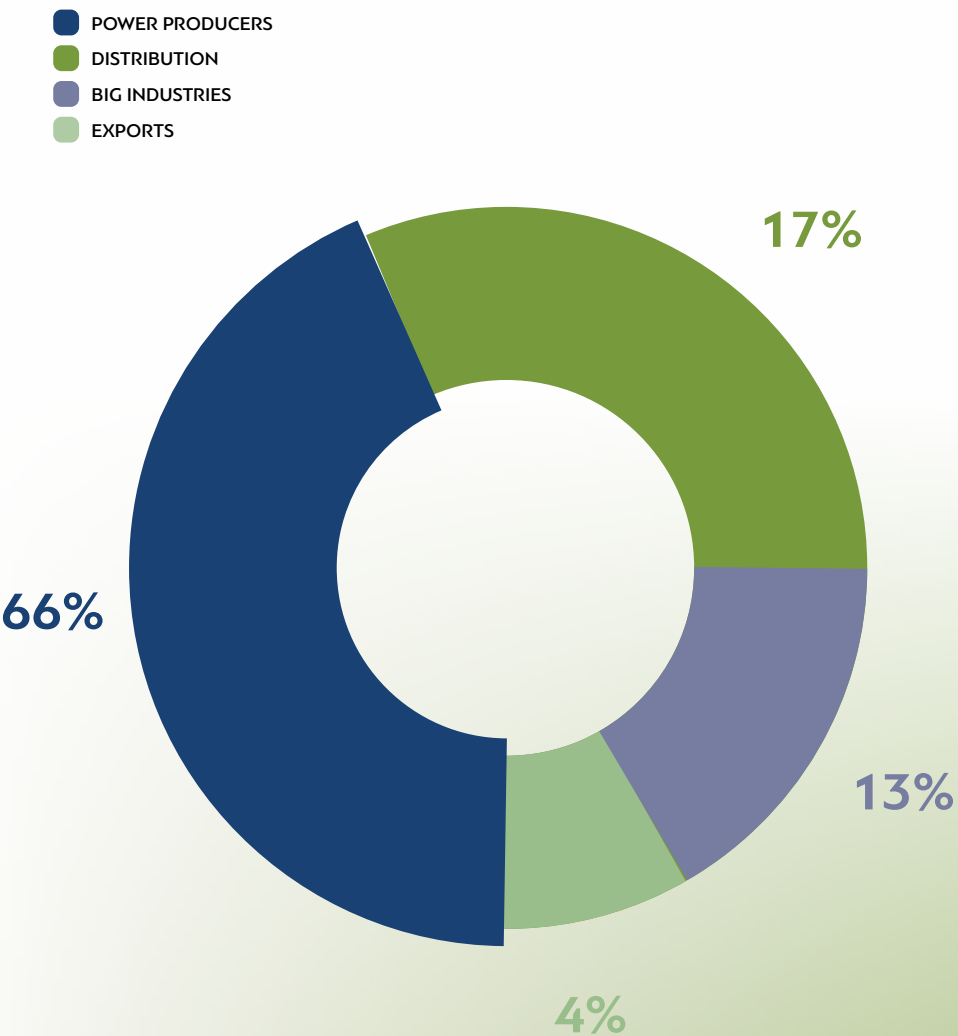


CHART 2: SHARES OF PHYSICAL OFF-TAKES 2024

## 2.3 DESFA's Role in Energy Transition

As Europe advances toward its 2050 carbon neutrality goals, DESFA remains committed to enabling the energy transition in Greece. Our strategy focuses on promoting green gases such as hydrogen and biomethane, while also advancing CCS technologies, mainly focusing on the midstream part of the value chain. DESFA is committed to reducing GHG emissions by 50% by 2030 and achieving carbon neutrality by 2040 under its Net Zero Master Plan.

At the same time, DESFA closely monitors European legislative developments, including the hydrogen and decarbonized gas market package and the establishment of ENNOH, ensuring that our strategy remains aligned with the evolving regulatory landscape. This forward-looking approach is reflected in our TYDP 2024-2033, which sets the foundation for the infrastructure and investments required to support Greece's energy transition.

### TEN-YEAR DEVELOPMENT PLAN 2024 - 2033

The NNGS Development Plan 2024-2033 encompasses 71 projects with a total budget of € 1,37 billion. Of these, 68 projects are included in the three-year development period, representing a corresponding investment cost (CapEx) of € 1,34 billion. Three new projects, with a combined budget of € 18,98 million, are included for the first time, while the remaining projects were included in previous Development Programs and are currently under development.

The investments included in the TYDP 2024-2033 aim to increase the capacity and flexibility of the system, as well as to relieve congestion in critical parts of the NNGS, ensuring the optimal utilization of existing and new infrastructure, such as Alexandroupolis FSRU, TAP and ICGB pipelines. The investment program also aims to strengthen the country's natural gas export capacity, contributing to the further diversification of supply sources and the energy security of Greece and the wider region, including through the development of new interconnections.

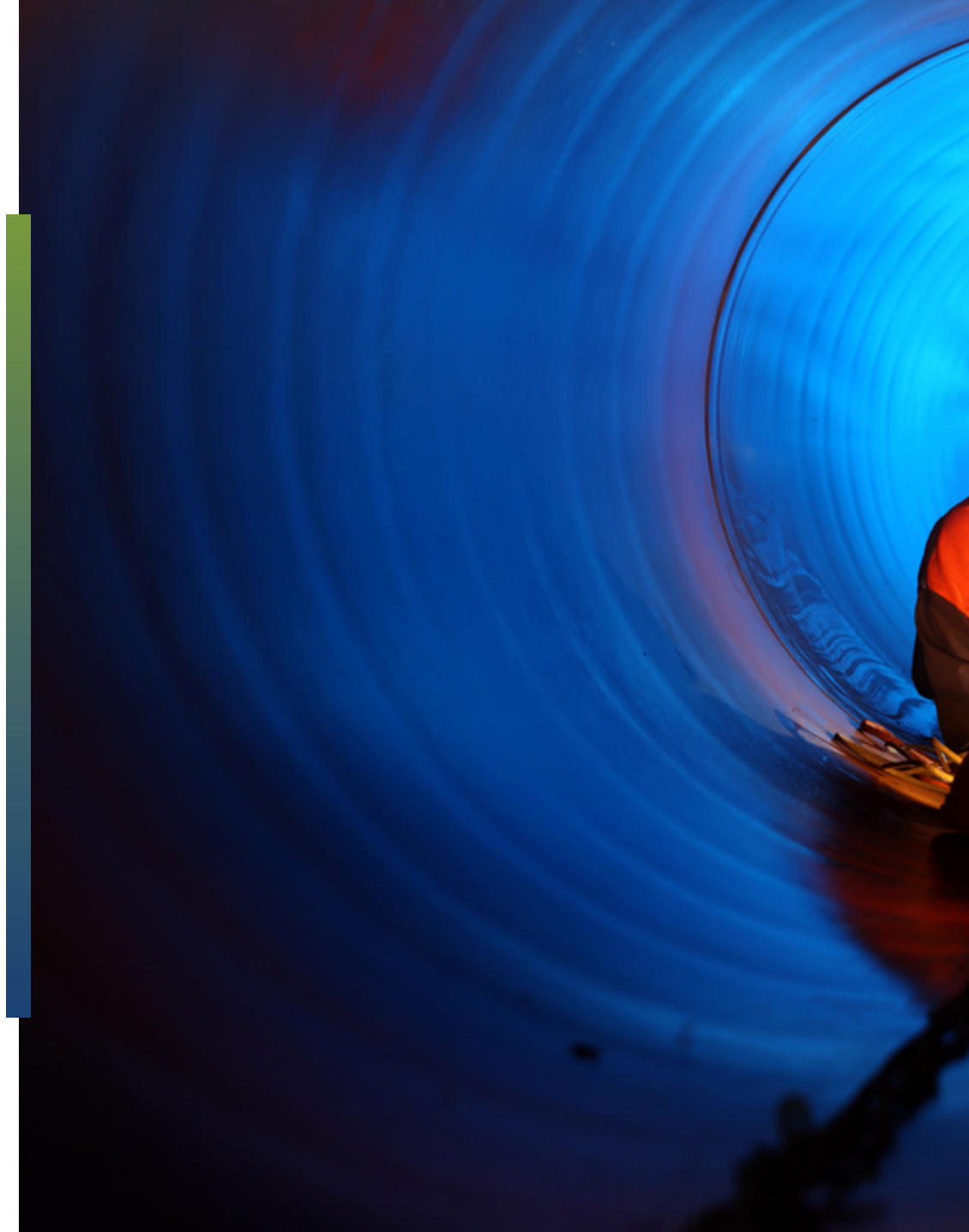


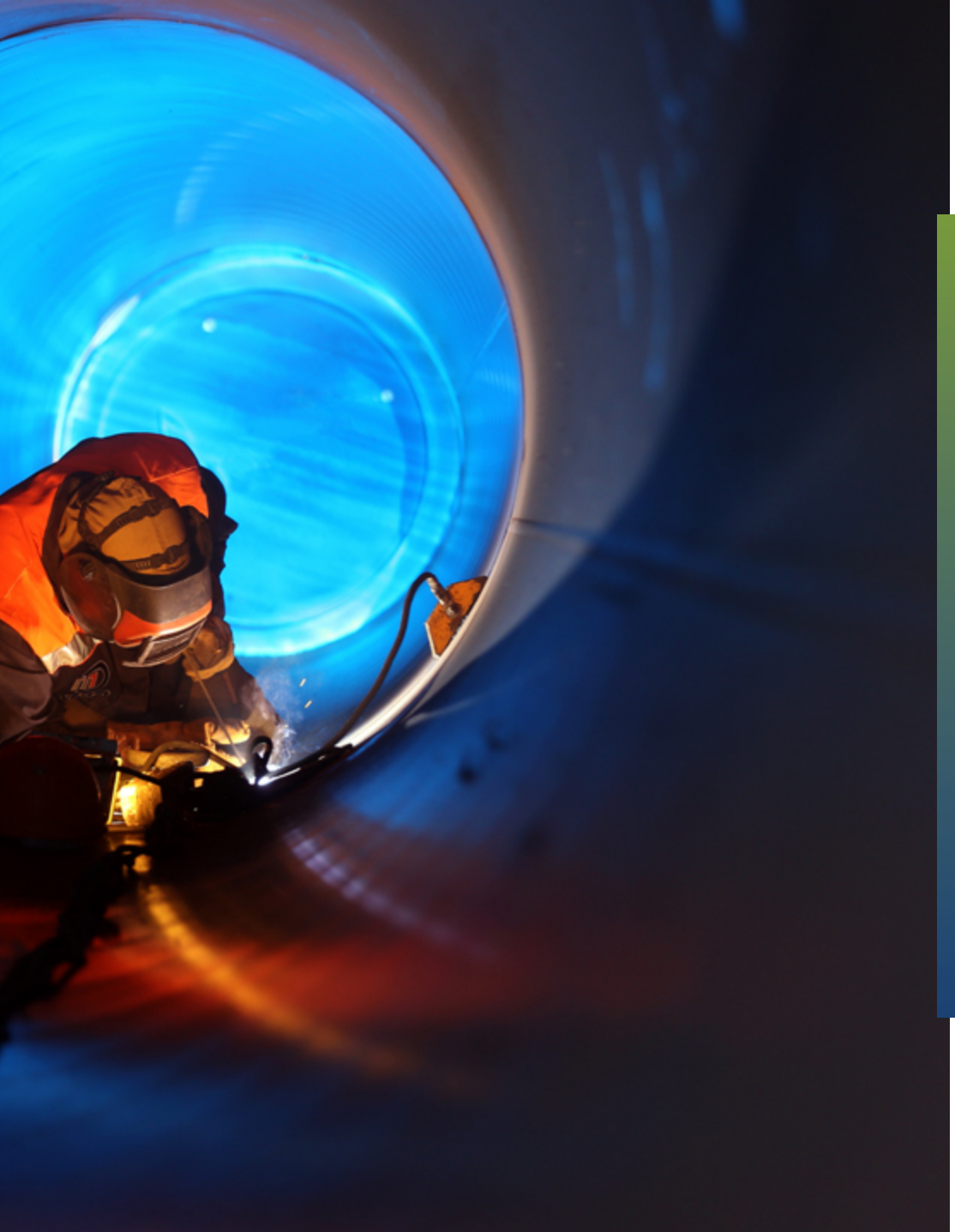


## 2.3 DESFA's Role in Energy Transition

Simultaneously, it aims to expand the transmission network to provide access to natural gas in new areas and markets, including through the development of the Small-Scale LNG value chain. Finally, in line with DESFA's decarbonization strategy, a series of projects are included to prepare the NNGS for the introduction of renewable gases, with a focus on hydrogen. Notable planned investments include:

- **New Karperi-Komotini Pipeline:** The 215 km-long pipeline will connect Karperi with Komotini, running parallel to the existing natural gas transmission infrastructure in the area. Its purpose is to enhance the system's capacity for increased gas flows between the North and South, addressing bottlenecks and ensuring steady access to new system entry and exit points. The pipeline is ready to accept hydrogen, if market conditions require and allow it, it can be connected in the future to the H2 backbone network development project in Karperi and used for the transport of pure hydrogen to the eastern part of the network. The project is expected to be completed by March 2027.
- **Nea Mesimvria – Evzoni – Gevgelija Pipeline:** This project aims to interconnect the natural gas transmission systems of Greece and North Macedonia, contributing to further diversification of supply sources for North Macedonia and increasing the use of NNGS infrastructure. The project is considered particularly important as it will strengthen Greece's role as a natural gas hub. It will also expand the market in the wider region, ensuring more NNGS Users have access to the NNGS and contributing to lower system charges due to increased usage of domestic infrastructure. The project is expected to be completed by March 2026.
- **HPP to West Macedonia:** A key project under development is the 160 km high-pressure natural gas pipeline to Western Macedonia, while completion is expected by mid-2025. In a later phase, the pipeline will be hydrogen-ready and may be connected to the Greek hydrogen corridor (Dedicated H<sub>2</sub> Backbone), becoming part of the renewable gas transport network for the Balkans and Southeast Europe.
- **Small-scale LNG jetty in Revithoussa:** The new small-scale LNG (ssLNG) jetty in Revithoussa will allow the loading of LNG onto smaller vessels. These vessels will supply LNG to other ships (e.g., cargo, passenger ships) primarily in Piraeus and potentially in other ports. Larger vessels will transport LNG to satellite storage and distribution facilities in other coastal areas of Greece, including ports (such as Patras, as outlined in the Poseidon Med II program) and off-grid facilities where natural gas consumption is deemed feasible, including islands, through virtual pipelines, thereby extending natural gas access to new areas and market.





## 2.3 DESFA's Role in Energy Transition

- **HPP to Patras:** Responding to the request of the Region of Western Greece, DESFA is moving forward with connecting the city of Patras and the Industrial Area (B.I.P.E.) to the NNGS, with plans for future expansion to other cities in Western Greece. The pipeline is designed to transport up to 100% hydrogen, aligning with DESFA's decarbonization plan, and is expected to be operational by March 2027.
- **Compression Station at Komotini:** This is a critical infrastructure project that will increase the volume of natural gas transported through this node, enhancing the security of supply for Greece and the region. The station will boost gas flows to both the west and east of Komotini, especially in light of the upcoming connection of the Alexandroupolis FSRU to the NNGS and other regional projects.
- **Compression Station in Ampelia:** The compression station in Ampelia, Farsala, is a critical project for DESFA, ensuring the hydraulic adequacy of the NNGS. This is essential due to the increased gas flows from north to south following the operation of the Trans Adriatic Pipeline (TAP) and its connection to the NNGS in Nea Mesimvria.
- **Compressor Station for the supply of the TAP pipeline in N. Mesimvria (Booster Compressor):** This investment will enable full bidirectional flow operation at the interconnection point (Phase 2 of the project). The station will have two power units of 1,1 MW each and one 3,3 MW unit, with no spare capacity, accommodating flows from very low levels up to 10 million Nm<sup>3</sup> per day.

Additionally, the new TYDP includes new projects worth a total of €18,98 million, of which € 13,77 million is allocated to investments promoting the energy transition and preparing the NNGS for the reception of renewable gases. Among these is the Amyntaio-Karperi hydrogen pipeline, costing € 13 million, which will transport 100% hydrogen to the entry point at Komnina, where it will connect to the HHP. The plan also includes a pilot hydrogen injection facility at DESFA's new Technical Training Center in Nea Mesimvria, which will be used to measure the safe injection of hydrogen into the grid.



## 2.4 Memberships and Industry Alliances

GRI 2-28

DESFA actively participates in leading industrial and economic organizations, reinforcing its commitment to knowledge sharing, collaboration, and continuous improvement in both business and sustainability practices. Through memberships in national and international associations, the company contributes to shaping industry standards, exchanging best practices, and promoting innovation in energy transition and environmental stewardship.

These engagements enable DESFA to remain at the forefront of sector developments, ensuring alignment with evolving regulatory frameworks and stakeholder expectations, while fostering dialogue on critical issues such as decarbonization, digitalization, and operational resilience.

				
Gas Infrastructure Europe (GIE) www.gie.eu	European Network of Transmission System Operators for Gas (ENTSO-G) www.entso-g.eu	Society of International Gas Tankers & Technical Operators Ltd (SIGTTO) www.sigtto.org	MARCOGAZ www.marcoGAZ.org	Hellenic Federation of Enterprises (SEV) www.sev.org.gr
				
Hellenic Association for Energy Economics (HAEE) www.haee.gr	Institute of Energy for South-East Europe (IENE) www.iene.eu	Greek Energy Forum www.greekenergyforum.com	Alliance for Greece www.symmaxia-giatinellada.gr	European Hydrogen Backbone (EHB) www.ehb.eu
				
Gas for Climate www.gasforclimate2050.eu	Oil & Gas Methane Partnership 2.0 (OGMP) www.ogmppartnership.com	European Clean Hydrogen Alliance www.europa.eu	Transparency International - Business Integrity forum www.transparency.gr	Carbon Capture and Storage Europe www.ccs-europe.eu
				
Hydrogen Europe www.hydrogeneurope.eu	European Network of Network Operators for Hydrogen (ENNOH) www.ennoh.eu	East Mediterranean Gas Forum www.ennoh.eu	Federation of Industries of Greece (SVE) www.sbe.org.gr	ARAB-HELLENIC CHAMBER OF COMMERCE & DEVELOPMENT www.arabhellenic-chamber.gr

## 2.5 Awards and Recognitions

At DESFA, every recognition is regarded as both an honor and a responsibility to continuously improve. The company's efforts in Occupational Health & Safety, Environmental Stewardship, and Quality Management consistently align with some of the highest standards in Greece, reflecting a sustained commitment to responsible and efficient operations.

Since 2013, DESFA has been acknowledged with more than 30 awards from respected industry bodies and stakeholders. These distinctions cover areas such as emissions reduction, safety awareness and preparedness, employee engagement, competency development, and waste management. Each award is the result of collective effort and a culture that prioritizes safety, sustainability, and operational excellence.

While these recognitions validate the progress DESFA has made, they also serve as a guide for the future. They inspire us to continue strengthening its practices, creating value for stakeholders, and contributing to a more sustainable energy system.





## 2.5 Awards and Recognitions

YEAR	AWARDING BODY	CATEGORY / TITLE	AWARD TYPE
2024	HR Awards 2024 by Boussias Communications	Introduction of a new Career Development Framework in the category of Best Organizational Effectiveness	SILVER
	CEO Award for Health, Safety, Security and Environment	6 <sup>th</sup> KIPIC HSSE CEO Award	N/A
	American Society of Safety Professionals (ASSP)	ASSP GCC HSE Excellence Award 2024 in the category of Oil & Gas	GOLD
	Environmental Awards 2024 by Boussias Communications	Environmental Team of the Year	GRAND AWARD
		Green Deal Compliance	GOLD
		CO <sub>2</sub> Emissions Footprint Monitoring	GOLD
		Sustainable Supply Chain	GOLD
		Emissions Control Technology	GOLD
		Energy Intensive Industry	GOLD
		Sustainable Infrastructure Development	SILVER
		GHG Offset	SILVER
		Wastewater Treatment	SILVER
		Energy Efficiency	SILVER
		Energy Efficiency Certification	SILVER
		Sustainable Business	SILVER
		Climate Change	SILVER
		GHG Reduction	BRONZE
	Health & Safety Awards 2024 by Boussias Communications	Employees Involvement	BRONZE
		Work Health & Safety (H&S) Training -Industry	BRONZE
		Innovation in Occupational Health & Safety	BRONZE

## 2.5 Awards and Recognitions

YEAR	AWARDING BODY	CATEGORY / TITLE	AWARD TYPE
2023	Health & Safety Awards 2023 by Boussias Communications	Employees Involvement	GOLD
		Wellness Initiatives	SILVER
		Work Health and Safety Invention	BRONZE
	American Society of Safety Professionals (ASSP)	ASSP GCC HSE Excellence Award 2023 in the category of Oil & Gas	SILVER
2022	Manager of the Year 2022	Supply Chain & Logistics Manager of the Year 2022	N/A
	Corporate Responsibility Index	Corporate Responsibility Index (CRI) 2021-2022	SILVER
	HR Awards 2022 by Boussias Communications	Equity & Social Protection in the Workplace / "Equity & Social Protection is included in company's values and constitutes a main drive of our operational activities"	SILVER
		Best Returning to the Workplace Plan	SILVER
	Oil & Gas Methane Partnership, United Nations	Company's performance in the Oil and Gas Sector for the year 2021	GOLD
2021	Health & Safety Awards 2021 by Boussias Communications	Crisis Response / Back to action: From paper to the field	GOLD
		Road Safety / Driving – First cause of accident in the NG sector	GOLD
		Critical Incident Response Unit / All around Greece – A need for alertness	SILVER
		H&S Culture / Culture as part of the HS Management System	SILVER
	HR Awards 2021 by Boussias Communications	Best Re-skilling Strategy / "Learning & Development Strategy: Adaptation to the new remote working conditions and connection with the vision and goals of the Company"	GOLD
		Best Flexible Working Strategy "DESFA during the Pandemic - the challenges in a new work reality"	SILVER
		Most Innovative use of Technology in HR / "The use of applications and portal technology in Human Resources Management"	SILVER
		Most Effective Recruitment Strategy / "Talent Acquisition Strategy: Connecting with the vision, goals and values of the Company through a corporate transformation in recruitment"	BRONZE
2018 - 2019	Environmental Awards 2018 by Boussias Communications	Health, Safety & Environment	GOLD
		Health & Safety Training and Awareness / Activities to Promote Corporate Culture	SILVER
		Waste Management	SILVER

TABLE 1: DESFA AWARDS AND RECOGNITIONS



## 2.5 Awards and Recognitions

## CERTIFICATIONS

During 2024, DESFA implemented a series of significant operational initiatives aimed at improving processes, standardizing practices, and strengthening control mechanisms across the organization. These efforts were closely linked to the company's commitment to international standards and best practices, which is reflected in the ISO certifications achieved during the year.

A key milestone was the attainment of ISO 14064 certification, underscoring our dedication to sustainability, carbon footprint management, and energy transparency. This certification aligns with the Corporate Sustainability Reporting Directive (CSRD/ESRS E1), enhancing our ability to meet evolving regulatory requirements for non-financial reporting. By adhering to ISO 14064 standards, DESFA ensure the accuracy and credibility of our greenhouse gas (GHG) emissions data, reinforcing stakeholder trust and supporting our progress toward a low-carbon future.

Furthermore, the Company achieved the OGMP Gold Standard for Reporting, demonstrating its commitment to transparency and continuous improvement. In the same year, DESFA also successfully renewed its ISO 14001:2015 certification in July, and maintained its ISO 50001 reaffirming its dedication to environmental management, energy efficiency and ongoing progress.

In parallel, DESFA continued to strengthen its resilience and governance framework to address emerging risks and ensure uninterrupted operations. In this context, the company achieved its first certifications in Information Security (ISO/IEC 27001:2022) and Business Continuity (ISO 22301:2019), covering the areas of Physical Dispatching and Commercial Services.

These certifications reflect our proactive approach to cybersecurity and operational continuity, ensuring that critical infrastructure remains secure and reliable under all circumstances.



## FIGURE 2: DESFA ISO CERTIFICATIONS









An aerial photograph of a dense, vibrant green forest. A winding river or stream flows through the center of the forest, reflecting the surrounding greenery. Soft, white mist or clouds are scattered throughout the scene, particularly on the right side, adding a sense of depth and atmosphere. The overall color palette is dominated by various shades of green, from deep forest greens to bright, sunlit yellows and whites from the mist.

# 03

## **SUSTAINABILITY MANAGEMENT AND STAKEHOLDER ENGAGEMENT**

---

**3.1 ESG Strategy and targets**

**3.2 Sustainability Oversight**

**3.3 Stakeholder Engagement and Communication**

**3.4 Risk Management**

**3.5 Double Materiality Assessment**



## 3.1 ESG Strategy and targets

### C-G4

Integrating sustainability into business strategy is essential for building resilience, maintaining trust, and ensuring long-term value creation. DESFA recognizes that Environmental, Social, and Governance (ESG) factors are fundamental to its operations and future growth.

The Company's ESG priorities are closely aligned with its core values, business objectives, and energy transition goals. It incorporates ESG considerations into daily operations through initiatives that promote innovation and digitalization, reduce emissions, protect biodiversity, and foster inclusive practices. This approach ensures that ESG efforts remain strategic and focused on the material issues and targets that matter most to DESFA and its stakeholders.

To support this commitment, DESFA continuously improves its processes to enhance transparency and facilitate accurate monitoring of ESG performance. Innovation plays a key role in identifying new solutions to environmental challenges, while active engagement with local communities ensures a positive contribution to society and the environment. Volunteering is also an integral part of this approach, reinforcing corporate culture and creating meaningful impact for vulnerable groups and environmental conservation efforts.

Further, DESFA's Sustainability Policy formalizes this commitment by embedding ESG principles across the value chain, guiding decision-making, and aligning with the Company's mission and strategic priorities. Through this policy, DESFA aims to strengthen sustainable operations, enhance accountability, and contribute to the energy transition and societal well-being.

Integration of decarbonized gases by 2040	Hydrogen readiness, participation in EU research projects & support pyrolysis technology. <b>H2DR1A project.</b>
	Support <b>Biomethane</b> production & transportation.
	Develop and leverage <b>CCS</b> technology & participation in EU projects. Establishment of the <b>Apollo CO<sub>2</sub></b> project.
Sustainability in Operations and Communities	Implementing energy efficiency initiatives and carbon reduction programs to <b>reduce our carbon footprint</b> , through our <b>Net Zero Master Plan</b> .
	<b>Minimizing flaring</b> through advanced technologies and process optimization (e.g., Boil off Gas (BOG) Compressor).
	<b>Monitoring and reducing emissions</b> through implementing LDAR technologies, and innovative projects.
	Engaging with <b>local communities</b> where DESFA operates to build lasting relationships, create long-term value, and drive them into a zero-carbon future.

TABLE 2: DESFA ESG STRATEGY KEY PILLARS





## 3.1 ESG Strategy and targets

### SUSTAINABILITY POLICY

DESFA owns, maintains, manages, operates, and develops the National Natural Gas System of Greece. As an active member of society, DESFA recognizes the essential challenge of climate change, the increasing demographic trends, and the rapid technological revolution that reshape the planet, our way of living, and doing business.

In this framework, DESFA has developed a Sustainability Policy that expresses the corporate identity and communicates the approach to sustainability and the commitments and actions regarding the Environment, Society, and Governance (ESG Factors). DESFA considers sustainability as a guiding principle for defining strategic and operating choices, while ESG factors constitute a valuable tool for creating shared value and making the Company respond beyond what is required by the regulatory framework.

### ENVIRONMENTAL APPROACH

DESFA's commitment to the Environment is reflected by implementing an Environmental Management System, covering all activities and facilities, based on ISO 14001:2015 international standard and communicating to stakeholders a QHSE Policy.

DESFA adopts a holistic approach concerning the Environment, committing itself not only to combat **climate change**, but also to adopt the best practices for the conservation and enhancement of the areas where it operates with its infrastructure, mitigating the **environmental impacts** of its operations. This is also reflected to the targets below:

- **Reduction** of CH<sub>4</sub> **emissions**, as well as in all targets concerning **energy efficiency**;

- New business development with particular focus to green gases and innovation, and, while adopting waste management and recycling programs in its operations and supply chain;

DESFA is also committed to involve stakeholders along the value chain in order to create synergies for reducing its direct and indirect energy emissions of Scope 1 and 2 greenhouse gases, based on the Paris Agreement, the EU Green Deal, and the EU Taxonomy, aiming to achieve **carbon neutrality** in its activities by **2050**.

### SOCIAL APPROACH

Further to the above, DESFA identifies employees, local communities, customers and suppliers as key stakeholders, since only through their participation will it be possible to achieve the challenging strategic objectives of the coming years. Contributing to the social and economic development of local communities, giving priority to those areas and regions in which the Company operates, by means of sustainable social action models.

DESFA promotes a culture that defends the individual and its **human rights, promoting diversity and equal opportunities** in an inclusive environment. The Company's employees are the most important asset for DESFA, and it is therefore of outmost interest to **attract and retain specialized human resources** and to **train and develop its staff continuously**, ensuring above all a **healthy and safe environment** for every one of them. The aim is always to provide the **highest quality of services to the customers**, achieving maximum satisfaction, while managing the **gas network in a reliable and socially responsible manner**.





## 3.1 ESG Strategy and targets

### GOVERNANCE APPROACH

Essential importance is given to the **proper Governance** of the Company, with special attention to **ethics, compliance**, service reliability, and efficiency, as well as the development of a risk management system, which will ensure the **business continuity** of the Company. DESFA considers market trends, the regulatory updates, and the strategic plans of its shareholders keeping its policy updated with a long-term perspective.

This sustainability policy is communicated to our stakeholders, in order to guarantee transparency and collaboration and is available to the public and to anyone who might be interested.

### TARGETS

#### A-G3

DESFA has established a structured set of targets across the Environmental, Social, and Governance pillars, ensuring that sustainability is embedded in every aspect of operations. These targets are designed to guide actions, monitor performance, and foster accountability across all business units. They include both short-term objectives to be achieved within the reporting period, and medium-term goals extending over a two-year period.

By setting clear and measurable commitments, DESFA reinforces its dedication to continuous improvement and transparent reporting, aligning with stakeholder expectations and international best practices. The following table presents the key targets that shape ESG roadmap and drive progress toward a more sustainable future.



## ENVIRONMENT

## EM-MD-540a.1

TARGET	ACTIONS	2024 STATUS
1,5% decrease in Carbon Footprint performance compared to 5yr rolling average	<ul style="list-style-type: none"> <li>Completion of high-pressure Boil Off Gas Compressor at LNG Terminal.</li> <li>Establishment of Level 5 (source and site level measurements and reconciliation between them for LNG and Compressor Station).</li> <li>Emissions reports for NNGS installations according to the Technical Guidance Tools of OGMP Framework.</li> <li>Implementation of an LDAR campaign for 2024 and increase the number of inspected facilities.</li> <li>Installation of a Process and Dry Seal Recompression System at the Compressor Station of Nea Messimvria.</li> <li>Reduction of Vents for Maintenance purposes (Gas venting Recompression mobile units), according to best practices.</li> <li>Replacement of old vehicles with new technology vehicles like Plug-in Hybrid Electric Vehicles (PHEV), fully electric, Compressed Natural Gas (CNG) and mild hybrid.</li> <li>Compliance with the climate law 4936/2022.</li> <li>Award Gold Standard - Reporting by OGMP 2.0 – IMEO.</li> </ul>	<b>Ongoing</b>  46% increase in carbon footprint performance <sup>8</sup> driven by limited natural gas availability via the LNG Terminal, which led to increased flaring, combined with elevated NG transfers from northern entry points to the South zone that significantly raised consumption at the Nea Messimvria Compressor Station
45% CH <sub>4</sub> emissions reduction by 2025		<b>Achieved</b>  246.309 kg / year 2023 Total methane emissions, 61% of CH <sub>4</sub> emissions reduction from base year 2015
20% decrease in average CO <sub>2</sub> /km from the company's vehicle fleet in 2024 (base year: 2021)		<b>Ongoing</b>  18% reduction of average gCO <sub>2</sub> /km from the company's vehicle fleet in 2024 (base year: 2021)
Zero incidents of LNG spills (m <sup>3</sup> ) and NG Leakages on an annual basis	<ul style="list-style-type: none"> <li>Implement Annual Preventive Maintenance Plan.</li> </ul>	<b>Achieved</b>
All new pipeline expansions of the NNGS included in the TYDP to be hydrogen ready	<ul style="list-style-type: none"> <li>The Asset Development Division (ASDEV) of DESFA has completed the specifications drafting. Pending items include internal approval by DESFA, external approval by the Ministry of Environment and Energy (MEEN), and disclosure through either official channels (HGG) or unofficial ones.</li> </ul>	<b>Achieved</b>  100% of hydrogen ready pipelines of the new NNGS expansions
Zero environmental and biodiversity-related incidents during construction & operation on an annual basis	<ul style="list-style-type: none"> <li>Revision of the internal system for identification and reporting of environmental incidents (Environmental Incidents Reporting Procedure), building on the existing identification and reporting workflow.</li> <li>Contractors established an Environmental Management System prior to construction commencement, approved by DESFA.</li> <li>Periodic communication with Site Representative, Supervision, and Contractor, monitoring contractors' environmental performance (including QHSE inspections).</li> <li>Perform analysis, taking into consideration Contractor's QHSE Procedures input.</li> <li>Lessons learnt and preventative measures application process.</li> </ul>	<b>Achieved</b>

<sup>8</sup> This Target is referring to Carbon Intensity Factor (gCO<sub>2</sub> emitted / Nm<sup>3</sup> of Transferred Gas) and not to absolute numbers of emissions. In addition, it concerns Scope 1 & Scope 2 Market Based emissions solely and not Scope 3 emissions

TARGET	ACTIONS	2024 STATUS
100% of hazardous solid and liquid wastes properly managed during construction & operation on an annual basis	<ul style="list-style-type: none"> <li>The QHSE Department of ASDEV and Asset Management Division monitor the management of hazardous wastes, while Health &amp; Safety, Security, Environment, and Quality (HSSEQ) Division performed the auditing.</li> </ul>	Achieved
Development of an internal environmental risk assessment methodology (procedure) for new projects regarding the protection of ecosystem and biodiversity (protected area habitats, permanent loss, endangered protected fauna and flora species)	<ul style="list-style-type: none"> <li>Population of the Environmental Risk Register.</li> <li>Data requests during study, construction, and operation phases (including GIS and Consultation documentation).</li> <li>Statistical analysis of collected data.</li> <li>Enhancement of ERM methodology for evaluation and reporting (including financial impact assessment, dynamic risk management, and risk tolerance integration).</li> <li>Partnerships with NGOs for biodiversity conservation (implementation of protection and/or enhancement measures based on EIA results).</li> <li>Training programs for reduction of environmental risk likelihood.</li> <li>Consultation meetings with NGOs for biodiversity conservation (hotspot identification per project).</li> <li>Baseline definition for environmental risk assessment.</li> </ul>	<p>Achieved</p> <p>Keeping evaluation of risks ALARP within National and European standards</p>
Approval of the CCS business plan and CCS business model by the end of the year	<p>Development of CCS logistic chain in Greece:</p> <ul style="list-style-type: none"> <li>Establishment of a dedicated team for the development of the project(s).</li> <li>Proactive engagement with relevant authorities to ensure the project's alignment with the country's targets and priorities.</li> <li>Completion of feasibility studies for CCS project.</li> <li>Agreement on CCS business model and DESFA's role.</li> <li>Application for Innovation Fund/CEF Funding for the CCS project.</li> </ul>	<p>Achieved</p> <p>Approval of the proposed CCS business plan and business model within December's Board meeting</p>
Maintain Compliance status A	<ul style="list-style-type: none"> <li>Daily monitoring of system.</li> <li>Scheduled and Ad hoc audits.</li> </ul>	Achieved
Maintain Certification of Energy Management System according to ISO 50001 for 2024	<ul style="list-style-type: none"> <li>Monitoring of system.</li> <li>Implementation of improvement actions following assessment.</li> <li>Scheduled and Ad hoc audits.</li> <li>Study for the replacement of Submerged Combustion Vaporizer (SCVs) with Open Rack Vaporizer (ORVs) at the LNG Terminal.</li> <li>Study for the installation of a small hydroelectric plant at the LNG Terminal.</li> <li>Study for the installation of smart electricity meters at facilities.</li> </ul>	Achieved
100% of non-polluted water returned to the environment on an annual basis	<ul style="list-style-type: none"> <li>Collection of data regarding water withdrawn from various sources (surface, underground, ocean) and used during construction/operation of pipeline systems (i.e. hydraulic tests, ORVs).</li> </ul>	<p>Achieved</p> <p>100% of non-polluted water returned to the environment on an annual basis (regarding construction of new projects)</p>
Completion of an H <sub>2</sub> market test by the end of 2024	<ul style="list-style-type: none"> <li>Inclusion of H<sub>2</sub> transit pipeline in the 6<sup>th</sup> PCI List.</li> <li>Development of H<sub>2</sub> valleys and pipelines in a) North Valley-West Macedonia to Thrace, b) South valley-Attica region.</li> <li>Conceptualize a H<sub>2</sub> pilot project with local partners and complete a Project Profile.</li> <li>Completion of a feasibility study for the dedicated H<sub>2</sub> pipeline.</li> <li>Application for CEF Funding for the dedicated H<sub>2</sub> pipeline.</li> </ul>	<p>Achieved</p> <p>Non-binding H<sub>2</sub> Market test concluded</p>

TARGET	ACTIONS	2024 STATUS
Completion of Hydrogen Blending & leakages Study - SHIMANAGAN (Safe Hydrogen Injection Management in the Natural GAs Network) from Energy Competence Center	<ul style="list-style-type: none"><li>Preparation of Hydrogen Blending Effect for leakages.</li><li>Cooperation with equipment vendors.</li><li>Cooperation with the NTUA.</li></ul>	<b>Achieved</b>  H <sub>2</sub> Injection to Gas Network Simulation Study completion
Submission of an Environmental Impact Study for the development of the pilot biomethane plant	<ul style="list-style-type: none"><li>Land plot securing through pre-sale agreement.</li><li>Submission of Environmental Impact Study.</li><li>Financing acquisition.</li><li>Definition of DESFA's role within the project and operational scope of collaborators, vendors, and suppliers.</li><li>Time horizon redefinition in case of project delay.</li></ul>	<b>Ongoing</b>  Pause of land plot presale Re-assessment of business development options & opportunities in view of the upcoming biomethane legislation

SOCIAL TARGETS

TARGET	ACTIONS	2024 STATUS
1≤ Lost Time Incident (LTI) Rate Employees & Contractors <2	<ul style="list-style-type: none"><li>Training, exercises, awareness campaigns, safety meetings, audits and monitoring.</li></ul>	<b>Achieved</b>
Zero fatalities / injuries or serious accidents	<ul style="list-style-type: none"><li>Training, exercises, awareness campaigns, safety meetings, audits and monitoring.</li></ul>	<b>Achieved</b>
1.100 hours of voluntary work to support local communities and people in need	<ul style="list-style-type: none"><li>Increase Employee Participation in voluntary activities.</li><li>Promotion of volunteering actions in the communities of operation by employees.</li></ul>	<b>Achieved</b>  1.548 Voluntary hours
Enter into 2 Partnerships for the implementation of the ideas proposed under the call4ideas Initiative in 2024	<ul style="list-style-type: none"><li>Facilitation of both external and internal call4ideas through DESFA's Innovation Platform.</li><li>Definition of the necessary framework for Proof-of-Concept development.</li></ul>	<b>Achieved</b>  2 PoCs have commenced
Increase of inclusiveness in employment	<ul style="list-style-type: none"><li>Transparent communication via Group Intranet on topics including solidarity, inclusion, diversity, and sustainability.</li><li>Discussions and meetings on Diversity &amp; Inclusion for issue promotion and initiative implementation.</li><li>Promotion of measures and collaborations to enhance female participation in leadership and responsibility roles.</li><li>Provision of equal opportunities for women in supervisory and managerial positions.</li><li>Maintenance of a standard 10% above the National Minimum Wage.</li><li>Implementation of an inclusive recruitment process using objective and impartial tools (e.g., psychometrics).</li><li>Promotion and support of workplace diversity to enhance employee contribution to organizational goals.</li><li>Provision of focused leadership development courses.</li></ul>	<b>Achieved</b>  Zero incidents of discrimination reported  35% diversity in employment (based on the % of women in DESFA's personnel)  34% diversity in supervisory/managerial positions (based on the % of women in DESFA's supervisory/managerial positions)



TARGET	ACTIONS	2024 STATUS
<60 days off due to accidents/illness	<ul style="list-style-type: none"> <li>• Training, exercises, awareness campaigns, safety meetings, audits and monitoring.</li> </ul>	<b>Achieved</b> (18 Days off)
>95% availability of all delivery points, LNG terminal, compressor station, complemented by 0 network inactivity time	<ul style="list-style-type: none"> <li>• Timely execution of work orders.</li> <li>• Competence maintenance of technical personnel.</li> <li>• Implementation of the Operation &amp; Maintenance Plan and acceleration of delayed maintenance operations.</li> </ul>	<b>Achieved</b> 100% through implementation of an Annual Maintenance Plan for: <ul style="list-style-type: none"> <li>- Delivery Points</li> <li>- LNG Terminal</li> <li>- Compressor Station</li> </ul>
100% completion of the “Vertical Corporate Acceleration” Initiative	<ul style="list-style-type: none"> <li>• Definition of the organizational model for the pilot.</li> <li>• Support for the definition of the budget engagement rules for the VCA initiatives.</li> <li>• Definition of a procurement process for onboarding startups at the end of the acceleration program.</li> <li>• Definition of legal frame agreement for participation at the Call for Idea/ Solution.</li> <li>• Identification of marketing and communication initiatives to sponsor the VCA.</li> </ul>	<b>Achieved</b>
Implementation of the Stakeholder Engagement Framework (SEF) for each new project from 2025 onwards	<ul style="list-style-type: none"> <li>• Finalization of SEF drafting, including Grievance Mechanism.</li> <li>• Finalization of internal review.</li> <li>• ESG Agents review.</li> <li>• Board Review.</li> <li>• Update of Dashboard's KPI based on SEF's KPIs.</li> <li>• Compliance with every new project with the SEF (implementation of Stakeholder Engagement Plan – SEP – for new major projects).</li> </ul>	<b>Ongoing</b> SEP for Karperi-Komotini pipeline has been under revision (95% preparation) SEP for Apollo CO <sub>2</sub> pipeline has been under internal review (85% preparation)
Increase Public Participation in project's development and Improvement of Quality of Life of engaged local communities	<ul style="list-style-type: none"> <li>• Liaison with Corporate Affairs for determination of current fund allocation.</li> <li>• Regional analysis of local community needs (new projects and operational areas).</li> <li>• Utilization of 2024 impact evaluation tool for prioritization of donations, sponsorships, and ESG initiatives.</li> <li>• Stakeholder Engagement Plan (SEP) development per project.</li> <li>• Support for Statutory Consultation and Disclosure procedures.</li> <li>• Execution of Voluntary Consultation and Disclosure, in alignment with SEF.</li> </ul>	<b>Achieved</b> 19 meetings with local communities engaged with the participation of more than 200 people
Provide at least 2 seminars on Equality, Diversity & Inclusion within 2024	<ul style="list-style-type: none"> <li>• Awareness-raising across all personnel on human rights per operating division (including aspects of diversity, potential violations, discrimination, child and forced labor).</li> </ul>	<b>Achieved</b> 2 seminars conducted (Diversity workshop, Business Ethics)

TARGET	ACTIONS	2024 STATUS
Increase of average training hours for upgrading skills	<ul style="list-style-type: none"><li>Development and implementation of the 2023 Training Plan through a systematic training needs analysis approach. Design and calibration of the 2024 Training Plan for Q1 launch.</li><li>Delivery of training courses through the DESFA Training Curriculum and ad-hoc sessions when required.</li></ul>	<b>Ongoing</b>  16.425,59 training hours for 2024/ 8,56 Average training hours/employee (9,20 for men, 7,35 for women)
Set objectives and competencies for all employees of the organizational structure of the Company	<ul style="list-style-type: none"><li>Annual performance review system implementation (including qualitative and quantitative data, with dedicated supervisor-employee meetings).</li><li>Objective and behavioral criteria setting for employee assessment.</li><li>Inclusion of sustainability objectives where applicable, based on role-specific relevance.</li></ul>	<b>Achieved</b>
Monitor Employee Satisfaction	<ul style="list-style-type: none"><li>Employee Satisfaction Survey during Q4 of 2024.</li></ul>	<b>Ongoing</b>  Scheduled and arranged for January 2025

GOVERNANCE TARGETS

TARGET	ACTIONS	2024 STATUS
80% satisfaction rate of Customers (Network Users & Non-Transmission Service Customers)	<ul style="list-style-type: none"><li>Management of structured Customer Feedback collection (customer satisfaction survey), to evaluate the results and provide Customer Satisfaction Report.</li></ul>	<b>Achieved</b>  92%
75% responsiveness rate of Customers (Network Users & Non-Transmission Service Customers) to satisfaction surveys	<ul style="list-style-type: none"><li>Distribution of evaluation questionnaires to Regulated Services and Non-Transmission Services Customers , in alignment with the established Customer Satisfaction process.</li><li>Collection and processing of feedback from completed questionnaires.</li><li>Drafting of the Customer Satisfaction Report.</li></ul>	<b>Achieved</b>  88%
75% of meetings with Active Network Users	<ul style="list-style-type: none"><li>Management of Market Intelligence and Customer Communications in order to gain market insights and ensure consistent &amp; efficient communication with the customers.</li></ul>	<b>Achieved</b>  85%
100% of the key personnel and new joiners (within the first semester of their onboarding) trained regarding the GDPR requirements, Whistleblowing Policy, Code of Ethics and Anticorruption Policy	<ul style="list-style-type: none"><li>Development and release of training / awareness material regarding the GDPR requirements, Whistleblowing Policy, Code of Ethics and Anticorruption Policy for the employees.</li></ul>	<b>Ongoing</b>  100% of new joiners trained during onboarding  100% of key personnel trained for data protection  82% of key personnel trained for the Whistleblowing Policy, Code of Ethics and Anticorruption Policy (the remaining 18% of key personnel are scheduled for training in Q2 2025).

TARGET	ACTIONS	2024 STATUS
<10 complaints received regarding the efficiency of operations and services	<ul style="list-style-type: none"> <li>Continuous improvement and efficiency of customer operations and services by improving the relevant processes (customer onboarding &amp; offboarding, solution offer, contract management).</li> </ul>	Achieved
0 complaints received regarding breach of their personal data on an annual basis	<ul style="list-style-type: none"> <li>Implementation of Data Protection Framework.</li> <li>Third Party management framework (DPAs, evaluation).</li> <li>Implementation of Data Minimization and Storage Limitation principles and Privacy by Design.</li> <li>Continuous training and awareness.</li> </ul>	Achieved
Pilot implementation of revenue/turnover that is EU Taxonomy aligned	<ul style="list-style-type: none"> <li>Application of eligibility and alignment criteria.</li> <li>Support of EU Taxonomy ratio with proper supporting evidence (i.e. project lists, Accounting Asset registers, descriptions, reasonings for eligibility and alignment.</li> </ul> <p>Note: This target serves monitoring purposes. 2023 will be the base year. This KPI is a lag indicator. Relies on past financial/accounting data. Finance has no control over output. It depicts the situation.</p>	<p>Ongoing</p> <p>€ 0 revenue/turnover from H<sub>2</sub>, bio-methane or CCS activities that is EU Taxonomy aligned</p>
4 meetings of the ESG Steering Committee	<ul style="list-style-type: none"> <li>Organization of 4 meetings of the ESG Steering Committee regarding the monitoring and implementation of the ESG and Sustainability Plan (donations and voluntary actions) and the ESG Report.</li> </ul>	<p>Achieved</p> <p>(7 in total)</p>
Implementation of ESG Report	<ul style="list-style-type: none"> <li>Data collection and analysis.</li> <li>Drafting of an ESG Report.</li> <li>Communication of the ESG report (website, social media, interviews, articles, participation in events).</li> </ul>	Achieved
Implementation of 70 HSSEQ audits, including contractors	<ul style="list-style-type: none"> <li>Development, execution, and monitoring of HSSEQ visits plan.</li> </ul>	<p>Achieved</p> <p>(73 audits in total)</p>
60 % digitalization of manual compilation procedures for Central Secretary and/or Fleet Management	<ul style="list-style-type: none"> <li>Assessment of manual compilation procedures for Central Secretary and/ or Fleet Management in order to proceed with % Digitalization end of 2024.</li> </ul>	<p>Achieved</p> <p>70% digitalization of manual compilation procedures for Central Secretary and/or Fleet Management</p>
One Independent review on Information Security on annual basis	<ul style="list-style-type: none"> <li>Information Security checks according to ISO 27001 requirements.</li> </ul>	Achieved
Continuous monitoring of the legal developments with the applicable regulatory framework at European level	<ul style="list-style-type: none"> <li>Participation in Legal Advisory Group (LAG: European Network of Transmission System Operators for Gas - ENTSOG's legal working group) meetings.</li> </ul>	<p>Achieved</p> <p>(10 Legal Advisory Group meetings in total during 2024, 3 of which we attended in person)</p>



TARGET	ACTIONS	2024 STATUS
100% of agreements taken care by the supply chain division to include a clause that vendor has read, accepted, and complied with DESFA's Code of Ethics	<ul style="list-style-type: none"><li>• Communication of Code of Ethics, Anticorruption Policy and Whistleblowing Policy to vendors upon onboarding and acceptance in the contractual terms.</li></ul>	<b>Ongoing</b>  92% of vendors compliant with corporate anticorruption core policies
100% of vendors compliant with corporate anticorruption core policies	<ul style="list-style-type: none"><li>• Implementation of vendor pre-qualification process for selecting and engaging vendors, using due diligence procedures and the relevant KYC tools.</li></ul>	<b>Ongoing</b>  92% of vendors compliant with corporate anticorruption core policies
100% of contractor alignment with QHSE Management System Standards, through evaluation of RfPs received	<ul style="list-style-type: none"><li>• In time review of Contractor's QHSE Management Systems during Projects Construction in order to comply with QHSE International Standards (ISO9001,ISO14001 and ISO 45001) and legislation requirements.</li></ul>	<b>Achieved</b>
Zero reports of monetary losses as a result of legal proceedings associated with bribery or corruption	<ul style="list-style-type: none"><li>• Development and release of awareness material regarding Whistleblowing, Code of Ethics and Anticorruption Policy requirements for the employees. (the KPI will be monitored and reported by LEGOV).</li></ul>	<b>Achieved</b>

## 3.2 Sustainability Oversight

GRI 2-12, GRI 2-13, GRI 2-14  
C-G2

DESFA has established a robust governance framework to ensure that sustainability principles are fully integrated into its business strategy and operations. Oversight of ESG matters is anchored at the highest level of the organization, with the Chief Executive Officer leading the ESG Steering Committee and actively participating in it, ensuring alignment with the Board of Directors (Board). This approach guarantees that all ESG initiatives and strategic decisions are endorsed at Board level, reinforcing accountability and transparency. Within this framework, the ESG Steering Committee and the Corporate Affairs, ESG & Communication Division play a central role in shaping, implementing, and monitoring the Company's sustainability strategy, driving continuous improvement across environmental, social, and governance dimensions.

### ESG STEERING COMMITTEE

The ESG Steering Committee is led by the CEO and consists of the Company's division directors, underscoring the significance of sustainable development within the organization. Committee members are tasked with developing, overseeing, and ensuring the effective implementation of the Sustainability Policy. This policy outlines the Company's goals, initiatives, and performance related to ESG matters, both internally and externally.

Further, the ESG Agents provide support to the committee as representatives from all corporate divisions. They are responsible for executing tasks related to sustainable development, including data collection, action planning, and progress monitoring and reporting.

The committee's key responsibilities include:

- Proposing and shaping the ESG and sustainability key priorities.
- Recommending social and environmental responsibility initiatives for inclusion in the Company's Business Plan.
- Receiving input from the Board on ESG and sustainability matters.
- Offering guidance to the Sustainability Team.
- Reporting on the progress of the ESG and Sustainability priorities.
- Presenting the annual ESG Report and initiatives implementation to the Board and stakeholders.
- Making annual or ad hoc adjustments to ESG priorities, as needed.



## 3.2 Sustainability Oversight

Regarding sustainability oversight, the Board members of DESFA hold the authority to approve the strategy on ESG related issues, as part of the Company's broader strategic framework. They actively engage in discussions on sustainability during Board meetings, including the establishment of related targets. It is important to note that there is no dedicated Board Committee specifically responsible for overseeing the Company's sustainability activities.

### CORPORATE AFFAIRS, ESG & COMMUNICATION DIVISION

The Corporate Affairs, ESG & Communication Division is dedicated to fostering a transparent and consistent long-term relationship with Institutional Stakeholders and Organizations.

On a quarterly basis, the Division reports to the ESG Steering Committee and subsequently to the Board on the organization's impact on the economy, environment, and society, using the ESG Dashboard.

The Division's responsibilities include, among others:

- Defining a comprehensive ESG strategy and a long-term plan for achieving ESG goals, in collaboration with ESG agents.
- Developing and overseeing the implementation of cross-functional ESG initiatives and strategies to promote corporate sustainability, while engaging both internal and external stakeholders.
- Monitoring the effectiveness of ESG initiatives through a standardized reporting framework and providing regular and ad-hoc sustainability reports to the Management Team and the Board.
- Supervising the preparation of the annual ESG report and participating in sustainability indices (e.g., UN Sustainable Development Goals, GRI Standards, ATHEX ESG Reporting Guide).
- Promoting ESG-related training within the organization, especially for those involved in ESG initiatives and workgroups.
- Overseeing the development of the sustainability model and promoting CSR activities.







### 3.3 Stakeholder Engagement and Communication

GRI 2-29  
C-S1

Stakeholder engagement is a cornerstone of DESFA's sustainability approach, ensuring open, transparent, and constructive dialogue with all parties affected by its operations. This engagement fosters trust, strengthens relationships, and enables the Company to align its strategy with stakeholder expectations, regulatory requirements, and market developments. Among the Company's key stakeholder groups, customers hold a central role in shaping both business performance and long-term sustainability objectives.

#### STAKEHOLDER IDENTIFICATION PROCESS

DESFA systematically identifies and engages with stakeholders—both internal and external—who may influence or be affected by its operations, including employees, suppliers, NNGS users, Board members, public authorities, other operators (Distribution System Operator (DSO)/TSO), local communities, financial institutions, and non-governmental organizations. This process is essential for understanding expectations, building trust, and ensuring that business decisions create long-term value.

Stakeholder identification enables the Company to map influence and interest levels, assess the proximity and quality of existing relationships, and define clear objectives, Key Performance Indicators (KPIs), and engagement strategies. It also helps prioritize material issues and milestones for each stakeholder group, ensuring that actions are targeted and effective. By analyzing interdependencies and potential impacts, DESFA can anticipate risks, forecast how actions by one stakeholder may affect others, and develop tailored action plans with specific tactics and engagement frequency.

This structured approach not only strengthens transparency and accountability but also creates opportunities for new synergies and partnerships that support DESFA's strategic goals. Ultimately, it enhances resilience and adaptability in a rapidly evolving energy landscape, ensuring that stakeholder engagement remains a key driver of sustainable growth. Throughout the reporting period, DESFA actively engages with its stakeholders through formal consultations and ongoing dialogue to understand and address their diverse interests. Using a structured materiality analysis, DESFA ensures that stakeholder input is carefully considered in decision-making processes, including discussions at Board level. This approach enables DESFA to enhance transparency and accountability in its regulated business activities.

### 3.3 Stakeholder Engagement and Communication

#### DESFA STAKEHOLDERS GROUPS

- Customers (NNGS Users, Other Services Customers)
- Members of the Board of DESFA.
- DESFA Employees.
- Public Authorities.
  - National Level.
  - European Level.
  - Regional and Local Level.
- Local Communities.
- Financial Institutions.
- Non-Governmental Stakeholders.
  - Public Institutions (chambers/associations).
  - Academia and Education.
  - NGOs/ Civil Society Organizations (CSOs).
- Third Parties.
  - Infrastructure Operators (Highway and Railway operators and Power Producers).
  - Other Operators (DSO/ TSO)
- Suppliers.

Throughout the reporting period, DESFA maintained active engagement with its stakeholders through formal consultations and continuous dialogue, ensuring that their perspectives and concerns are understood and addressed.

This process is supported by a structured double materiality analysis (see unit 3.5 Double Materiality Analysis), which ensures that stakeholder's input is systematically incorporated into decision-making, including discussions at Board level. By embedding these practices into its governance framework, DESFA enhances transparency, accountability, and responsiveness in its regulated activities.

The following table provides an overview of the Company's key stakeholder groups, the primary methods of communication, and the frequency of engagement, reflecting the breadth and depth of DESFA's stakeholder network.



TABLE 3: STAKEHOLDER'S ENGAGEMENT FRAMEWORK

STAKEHOLDER GROUPS	COMMUNICATION / ENGAGEMENT METHODS	FREQUENCY OF ENGAGEMENT
Customers (NNGS Users, Other Services' Customers) <sup>9</sup>	<ul style="list-style-type: none"> <li>• Website</li> <li>• Social media</li> <li>• Meetings (Online / Face to face)</li> <li>• Conventional and digital marketing tools</li> <li>• Market events and business associations</li> <li>• Evaluation Questionnaires</li> <li>• Environmental and Social Impacts Assessment (ESIA) for projects and operations</li> <li>• Press releases, interviews and articles</li> <li>• Public Consultations</li> </ul>	When necessary
Members of the Board of DESFA	<ul style="list-style-type: none"> <li>• Awareness Trainings</li> <li>• Corporate events / Volunteerism initiatives</li> <li>• ESG Report</li> <li>• Evaluation Questionnaires</li> <li>• Financial Statement</li> <li>• Internal Communication emails, SMS</li> <li>• Meetings (Online / Face to face)</li> <li>• NNGS Development Plan</li> <li>• Portal</li> <li>• Social media</li> <li>• Sustainability &amp; Carbon Footprint Report</li> <li>• Website</li> </ul>	Ongoing
DESFA Employees	<ul style="list-style-type: none"> <li>• Portal</li> <li>• Internal Communication emails, SMS</li> <li>• Personal Meetings (MS Teams / Face to face)</li> <li>• Corporate events / Volunteerism initiatives</li> <li>• Employee and Union Relations</li> <li>• Awareness Trainings</li> <li>• Press releases, interviews and articles</li> </ul>	Ongoing
Public Authorities	<ul style="list-style-type: none"> <li>• Conventional and digital marketing tools</li> <li>• Corporate events / Volunteerism initiatives</li> <li>• ESG Report</li> <li>• Financial Statement</li> <li>• Market events and business associations</li> <li>• Meetings (Online / Face to face)</li> <li>• NNGS Development Plan</li> <li>• On-site visits</li> <li>• Sustainability &amp; Carbon Footprint Report</li> <li>• Environmental (and Social) Impacts Assessment for projects and operations</li> <li>• Website</li> <li>• Press releases, interviews and articles</li> <li>• Consultations</li> </ul>	Ongoing
Third Parties	<ul style="list-style-type: none"> <li>• Awareness Trainings</li> <li>• Conventional and digital marketing tools</li> <li>• Corporate events / Volunteerism initiatives</li> <li>• ESG Report</li> <li>• Evaluation Questionnaires</li> <li>• Financial Statement</li> <li>• Market events and business associations</li> <li>• Meetings (Online / Face to face)</li> <li>• NNGS Development Plan</li> <li>• On-site visits</li> <li>• Social media</li> <li>• Sustainability &amp; Carbon Footprint Report</li> <li>• Website</li> <li>• Press releases, interviews and articles</li> </ul>	Occasionally

<sup>9</sup> Customers include Transmission, LNG and TLS Users as well as the Non-transmission and Other Non-Regulated Services Customers.



Stakeholder Groups	Communication / Engagement Methods	Frequency of Engagement
Suppliers	<ul style="list-style-type: none"> <li>Website</li> <li>Meetings (Online / Face to face)</li> <li>Conventional and digital marketing tools/platforms</li> <li>Market events and business associations</li> <li>Evaluation Questionnaires</li> <li>Sustainability &amp; Carbon Footprint Report</li> <li>Financial Statement</li> <li>ESG Report</li> <li>Press releases, interviews and articles</li> </ul>	Occasionally
Local Communities	<ul style="list-style-type: none"> <li>Conventional and digital tools</li> <li>Corporate events / Volunteerism initiatives</li> <li>ESG Report</li> <li>Employee and Union Relations</li> <li>Evaluation Questionnaires</li> <li>Financial Statement</li> <li>Meetings (Online / Face to face)</li> <li>NNGS Development Plan</li> <li>On-site visits</li> <li>Personal Meetings (MS Teams / Face to face)</li> <li>Portal</li> <li>Social media</li> <li>Sustainability &amp; Carbon Footprint Report</li> <li>EIA</li> <li>Website</li> <li>Press releases, interviews and articles</li> </ul>	When necessary
Financial Institutions	<ul style="list-style-type: none"> <li>Website</li> <li>Market events and business associations</li> <li>Financial statements</li> <li>Meetings (Online / Face to face)</li> <li>ESG Report</li> <li>Press releases, interviews and articles</li> </ul>	Occasionally
Non-Governmental Organizations	<ul style="list-style-type: none"> <li>EIA</li> <li>Website</li> <li>Social media</li> <li>Sustainability &amp; Carbon Footprint Report</li> <li>Meetings (Online / Face to face)</li> <li>Market events and business associations</li> <li>Press releases, interviews and articles</li> <li>Corporate events / Volunteerism initiatives</li> </ul>	When necessary

### 3.4 Risk Management

The Enterprise Risk Management (ERM) Department plays a strategic role within DESFA, acting as an advisor to senior management and providing timely insights to support informed decision-making. The results of enterprise risk assessments are aligned with Internal Audit process, ensuring a coordinated and holistic approach to risk and control management. This alignment strengthens DESFA's Internal Control and Risk Management System, enhancing transparency, governance, and organizational resilience.

ERM activities follow a structured methodology aligned with internationally recognized standards, including the COSO ERM Framework and ISO 31000:2018 – Risk Management Guidelines. This framework embeds risk management practices across the organization and ensures agility in responding to emerging threats and opportunities. The process is built on four key pillars: risk identification, analysis, evaluation, and continuous monitoring (with KRIs and mitigation actions), forming a comprehensive cycle of risk governance.

Since 2022, DESFA has integrated ESG considerations into its ERM framework to strengthen alignment between sustainability objectives and risk governance. The primary goal of this integration is to embed ESG-related risks into the Enterprise Risk Register, supporting the Company's ESG function. Key activities included identifying ESG elements within existing ERM risks, linking these risks to ESG targets, and conducting workshops with risk owners to review progress and controls.

In 2024, the Enterprise Risk Register was updated to reflect significant changes in material topics and ESG targets, enhancing the alignment of ESG objectives with enterprise risks, controls, and improvement opportunities. The integration of ESG into ERM delivers multiple benefits, including stronger coordination between risk and sustainability functions, improved confidence in ESG oversight and risk management, and continuous enhancement of controls and mitigation measures.



## 3.5 Double Materiality Assessment

### GRI 3-1 C-G3

DESFA focuses on sustainable development topics related to its business activity and the economic, environmental, and social impacts it creates (inside-out approach). At the same time, it examines the risks and opportunities created by the environment and society affecting the Company (outside-in approach). Within this context, in 2025, DESFA conducted for the first time a Double Materiality Analysis adopting the new methodology of the European Sustainability Reporting Standards (ESRS), in order to prioritize:

- Topics that present or are likely to present the most significant positive and negative economic, environmental, and social impacts, including human rights impacts throughout the value chain (impact materiality).
- The financial risks and opportunities arising from the environment and society for the Company (financial materiality).

Double Materiality Analysis is a key tool that contributes to the formulation of its Sustainable Development Strategy. It is a dynamic process, continuously evolving and carried out regularly to remain relevant, reflecting the focus areas of all stakeholders.

#### Phase 1: Understanding the Operating Framework

The first phase of the Double Materiality Analysis focused on developing a comprehensive understanding of DESFA's operating context. This included an in-depth review of the

Company's operations across the value chain, business activities, stakeholders, as well as the external landscape, including sustainability trends and reporting frameworks.

As part of this process, DESFA examined its existing projects, actions and ESG initiatives, analyzing current strategies and policies in place.

This holistic approach ensured that the process captured both internal and external factors critical to shaping the Company's operating framework.

#### Phase 2. Impacts, Risks, and Opportunities Identification

##### Impact Materiality

DESFA identified both positive and negative impacts across its entire value chain, considering activities, geographic areas of operation, business relationships, and nature-related dependencies. The analysis focused on actual impacts for 2025—the period during which the assessment was performed—and potential impacts for 2028, marking the end of the three-year development horizon when most projects under the TYDP 2024–2033 will be operational, as well as for 2033, the final year of the TYDP.

To further strengthen the analysis DESFA examined nature-related potential negative impacts using the ENCORE tool<sup>10</sup>. This approach provided valuable insights into the Company's interactions with natural capital and associated systemic risks. All identified impacts were validated through targeted

consultations with the ESG Agents across the Company, ensuring accuracy and alignment with operational realities. This integrated methodology embeds sustainability considerations into DESFA's overall governance framework, reinforcing accountability and strategic resilience.

##### Financial Materiality

The identification of financial risks and opportunities began with a thorough review of DESFA's existing Risk Registry. The analysis focused on inherent risks, considering a broad spectrum of categories, including operational, strategic, reputational, financial, human capital, technology & cybersecurity, supply chain, regulatory and compliance risks, sustainability-related opportunities based on positive environmental and social impacts as also the existence of dependencies on natural and social resources as sources of financial effects.

In particular, the process included consultations with risk and finance ESG Agents and executives to ensure accuracy and completeness. It involved consolidating and refining existing enterprise risks, integrating ESG elements that could create financial effects for the Company, and identifying opportunities with potential positive financial effects across three time-horizons (2025, 2028, and 2033), as applied in impact materiality as well.

Each identified risk and opportunity (RO) was then mapped against the ESRS topics, sub-topics, and sub-sub-topics. Supporting justifications were also developed to guide ESG Agents in conducting an accurate and objective assessment in the next phase.

<sup>10</sup> ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) is a free, online tool that helps organizations explore their exposure to nature-related risk and take the first steps to understand their dependencies and impacts on nature.



## 3.5 Double Materiality Assessment

### Phase 3. Impacts, Risks, and Opportunities Assessment and Prioritization

DESFA applied a structured approach to determine materiality, using criteria aligned with the ESRS. Impact materiality was assessed based on the severity and likelihood of impacts, while financial materiality considered the magnitude of potential financial effects and their likelihood of occurrence, as follows:

#### Impact Materiality

Impact materiality is assessed through the combined evaluation of two parameters:

- **Severity**, determined by:
  - **Scale**: Assesses how significant or grave the negative impact is, or how beneficial the positive impact is for people or the environment.
  - **Scope**: Evaluates how widespread the impact is.
  - **Irremediability of Impact (negative impacts only)**: Considers whether and to what extent the negative impact can be remediated, i.e., restoring the environment or affected people to their prior state.
- **Likelihood**: Represents the probability of the impact occurring in the future. For actual impacts (2025), likelihood is automatically set to the highest value.

Impact materiality is then determined by combining the severity score with the likelihood score, ensuring a balanced and comprehensive assessment of both actual and potential impacts. The evaluation is performed on a five-point scale, with a threshold set at 4, indicating that an impact is considered material.

#### Financial Materiality

Financial materiality is assessed through the combined evaluation of two parameters:

- **Magnitude**: Represents the potential financial effect of a risk or opportunity on the Company's financial performance. Magnitude is determined using predefined thresholds aligned with DESFA's ERM framework.
- **Likelihood**: Indicates the probability of the risk or opportunity occurring within the relevant time horizon.

The financial materiality score is calculated by combining the ratings for magnitude and likelihood on a five-point scale. For the short-term horizon (2025), DESFA applied its established risk assessment methodology, classifying risks as financially material or non-material using a defined 1–5 scale. A score equal to or greater than 4 was considered material, corresponding to an estimated financial impact exceeding € 2,5 million - a threshold which also applied to the other time horizons.

For the medium-term (2028) and long-term (2033) horizons, ESG Agents assessed the magnitude of financial effects and the likelihood of occurrence for each identified risk and opportunity. These assessments were supported by appropriate substantiation and evidence through targeted internal consultations with the divisions involved.













This structured, evidence-based approach ensured that risks and opportunities were prioritized according to their effect on DESFA's financial resilience.

### Results Validation GRI 2-14

The results of the materiality assessment were presented and validated during a dedicated session of the ESG Steering Committee, with the active participation of the CEO. The CEO reviewed the results and corresponding justifications to ensure they were robust, evidence-based, and aligned with the Company's strategic priorities. This process confirmed the completeness and accuracy of the assessment and reinforced accountability at the highest level of governance. The validation step also ensured that the final list of material topics reflects DESFA's long-term sustainability objectives.

## MATERIAL TOPICS

















## GRI 3-2

MATERIAL TOPICS	IRO <sub>s</sub>	IMPACT MATERIALITY	FINANCIAL MATERIALITY	SUSTAINABLE DEVELOPMENT GOALS (SDGS)
Climate Change	<b>Climate Change:</b> Construction and civil engineering projects release carbon dioxide and other indirect greenhouse gases from the use of heavy machinery and vehicular traffic; (upstream – Scope 3 emissions).			    
	<b>Climate Change:</b> GHG emissions occur during the extraction, processing, and transportation of fossil fuels in the upstream supply chain (well-to-tank). These activities involve energy-intensive operations, flaring, and methane leaks, which significantly contribute to Scope 3 emissions. Such impacts amplify climate risks and increase DESFA's indirect carbon footprint.			
	<b>Climate Change Mitigation:</b> DESFA is committed to reducing GHG emissions by 50% by 2030 and achieving carbon neutrality by 2040 under its Net Zero Master Plan, investing in green gases (hydrogen, biomethane), carbon capture technologies, and future-proof infrastructure while actively contributing to national strategies for renewable gases.			
	<b>Climate Transition Risk:</b> As the global economy accelerates its transition toward net-zero emissions, DESFA faces growing climate-related transition risks stemming from shifting market dynamics, evolving regulations, stakeholder expectations and technology risk. These risks may significantly impact the company's business model, asset base, and long-term financial performance.			
	<b>Physical Climate Risk (Chronic):</b> Long-term climate shifts — such as rising temperatures, altered precipitation, humidity changes, and soil instability — may compromise the structural integrity, reliability, and safety of DESFA's gas infrastructure. These chronic conditions can lead to asset degradation, operational disruptions, compliance risks, financial and reputational damage.			
	<b>Physical Climate Risk (Acute - extreme weather events):</b> Climate change is increasing the frequency and severity of extreme weather events such as floods, storms, and wildfires. These acute events can damage DESFA's infrastructure (e.g. pipelines, LNG terminals), disrupt natural gas transmission and operations, and pose safety risks to employees.			
	<b>Climate Transition Opportunity:</b> As the global economy accelerates toward net-zero emissions, DESFA has a strategic opportunity to proactively manage climate-related transition risks and position itself as a key enabler of a low-carbon energy system. By addressing these risks head-on, DESFA can unlock new value streams, enhance resilience, and strengthen its long-term competitiveness.			

Note: Impact Materiality: Positive impact:  Negative impact:  | Financial Materiality: Opportunity:  Risk: 

# MATERIAL TOPICS








## GRI 3-2

MATERIAL TOPICS	IRO <sub>s</sub>	IMPACT MATERIALITY	FINANCIAL MATERIALITY	SUSTAINABLE DEVELOPMENT GOALS (SDGS)
Supplier Environmental Impacts	<b>Non-GHG Air Pollution:</b> Non-GHG emissions, including Volatile Organic Compounds (VOCs), nitrogen oxides (NO <sub>x</sub> ), sulfur oxides (SO <sub>x</sub> ), particulate matter (PM10, PM2.5), and Benzene, toluene, and xylene (BTX) compounds are released during upstream activities (electricity, diesel, petrol and natural gas).			 
Biodiversity	<b>Land Ecosystem Use Change:</b> During construction of major pipelines, terrestrial ecosystems and land uses are temporarily impacted due to vegetation clearing along the work strip. During reporting period, only the West Macedonia HPP was under construction; construction of other upcoming projects (i.e. IGMN) had yet to proceed to any intervention works.			  
	<b>Land Ecosystem Use Change:</b> During operation of DESFA's network, restrictions are imposed within the 8m wide corridor of Pipeline Protection Strip leading to land cover changes since no deep-rooted vegetation is allowed.			
	<b>Disturbances:</b> The construction front can cause disturbances such as noise and light pollution due to the operation of machinery, which may disturb or negatively affect species populations. If these disturbances are not mitigated, habitat degradation may take place.			
	<b>Nature Impact Transition Risk:</b> Natural gas infrastructure can disturb local ecosystems and habitats, modifying biodiversity dynamics. Taking into consideration the fact that more and more new regulations aiming at ecosystems and biodiversity protection are issued, this can result in regulatory risks and potential liabilities, including imposing additional compliance costs or operational restrictions.			
Employment Practices	<b>Employment Practices Risk:</b> Inadequate employment practices — including gaps in fair working conditions, talent retention, succession planning, and incentives — may reduce employee engagement and productivity, hinder talent attraction, and compromise business continuity. This can expose DESFA to operational inefficiencies, reputational damage, and regulatory scrutiny.			    

Note: Impact Materiality: Positive impact:  Negative impact:  | Financial Materiality: Opportunity:  Risk: 



MATERIAL TOPICS  
GRI 3-2

MATERIAL TOPICS	IRO <sub>s</sub>	IMPACT MATERIALITY	FINANCIAL MATERIALITY	SUSTAINABLE DEVELOPMENT GOALS (SDGS)
Impacts on Local Communities & Energy Access	<b>Socio-economic Impact to Local Communities through Employment and Development (e.g. industrial) Opportunities:</b> The construction and operation of DESFA's projects generate direct, indirect, and induced jobs, boosting income opportunities and enhancing local economies through services like accommodation, cleaning, security, and catering.	✔		  
	<b>Energy Security and Infrastructure:</b> DESFA's pipeline and network infrastructure operations ensure access to natural gas for the local market and essential utilities across Greece, including power plants, airports, and hospitals, thereby maintaining the quality of public facilities and socioeconomic impact value.	✔		
	<b>Energy Security and Infrastructure Opportunity:</b> DESFA's strategic upgrades to gas, hydrogen, and CO <sub>2</sub> infrastructure aim to boost national energy security, system flexibility, and new revenue opportunities. Expanding the Small-Scale LNG sector—with the Truck Loading Station and planned small LNG carrier platform at Revithoussa—will further enhance gas availability and supply security for off-grid areas.		↑	
Cybersecurity and Data Protection	<b>Cybersecurity &amp; System Integrity Risk:</b> Failure to safeguard the confidentiality, integrity, and availability of commercial, technical, personal and operational data can expose DESFA to legal penalties, reputational damage, and operational disruption.		↓	
	<b>Cybersecurity &amp; System Integrity Opportunity:</b> Strengthening the confidentiality, integrity, and availability of DESFA's data and IT systems presents a key opportunity to enhance operational efficiency and reduce exposure to costly disruptions.		↑	
Responsible Procurement	<b>Supplier Governance and Oversight Risk:</b> Lack of a formalized and transparent framework for the selection and oversight of suppliers and external partners may lead to substandard service delivery, operational inefficiencies, and reputational risk.		↓	  
Business Conduct & Compliance	<b>Anti-Corruption and Bribery Compliance Risk:</b> Failure to implement and enforce a robust compliance framework — including ethics, anti-bribery, and anti-corruption measures — may expose DESFA to significant legal, financial, and reputational risks.		↓	

Note: Impact Materiality: Positive impact: ✔ Negative impact: ✖ | Financial Materiality: Opportunity: ↑ Risk: ↓

### 3.5 Double Materiality Assessment

In the 2024 materiality assessment, several adjustments were introduced compared to the previous reporting year:

- "Health and Safety" was not classified as a material topic in the latest analysis. This decision reflects management's view that, due to continuous monitoring and robust occupational health and safety practices, the likelihood of incidents remains below the defined threshold. Nevertheless, Health and Safety always remain an integral element of all daily operations and is embedded in the planning of all activities.
- "Biodiversity" emerged as a material topic in 2024, encompassing aspects previously addressed under "Land Rights" thereby broadening the scope of environmental considerations.
- "Supplier Environmental Impacts" was identified as material for the first time, following the double materiality approach that evaluates impacts across the entire value chain.
- "Responsible Procurement" was also introduced as a material topic, incorporating elements such as "Freedom of Association and Collective Bargaining" recognizing their relevance in both upstream and downstream segments of the value chain.
- "Impacts on Local Communities & Energy Access" consolidated previous topics ("Local Communities" and "Economic Impact") into a single, comprehensive theme, reflecting a more holistic view of socioeconomic contributions.
- "Cybersecurity and Data Protection" was elevated to a standalone material topic, whereas in the prior assessment it was included under "Business Conduct" acknowledging its growing significance for operational resilience and stakeholder trust.

DESFA's approach to addressing material topics is reflected in the actions undertaken to mitigate and manage negative impacts and risks, while also enhancing positive impacts and opportunities. These actions, along with DESFA's performance and their alignment with the company's sustainability priorities, are presented in detail in the following chapters.







# 04 ENVIRONMENT

---

4.1 Climate Change Mitigation and Adaptation

4.2 Carbon Footprint and Energy

4.3 Biodiversity and Ecosystem Impacts

4.4 Supplier Environmental Impacts



## 4.1 Climate Change Mitigation and Adaptation



MATERIAL TOPIC: CLIMATE CHANGE

IMPACT: CLIMATE CHANGE

IMPACT: CLIMATE CHANGE MITIGATION

RISK: PHYSICAL CLIMATE RISK (CHRONIC)

RISK: PHYSICAL CLIMATE RISK (ACUTE - EXTREME WEATHER EVENTS)

RISK: CLIMATE TRANSITION RISK

OPPORTUNITY: CLIMATE TRANSITION OPPORTUNITY

### GRI 3-3 A-E2

DESFA recognizes climate change as a material topic with far-reaching implications for its strategic direction, operational continuity, and long-term value creation. In response, the Company has adopted a comprehensive management approach that integrates both climate mitigation and adaptation into its corporate strategy, infrastructure planning, and governance frameworks. This dual approach enables DESFA to reduce its GHG emissions while enhancing its resilience to the physical and transitional impacts of a changing climate.

The Company's mitigation strategy is driven by its Net Zero Master Plan, which sets a clear trajectory toward carbon neutrality by 2040, with an interim target of a 50% reduction in Scope 1 and 2 emissions by 2030 compared to 2018 levels. Through targeted investments in renewable and low-carbon gases such as hydrogen and biomethane, as well as CCS technologies, DESFA is actively transforming its infrastructure to support a low-carbon energy system. These actions directly address transition risks, including regulatory compliance pressures, carbon pricing exposure, and the risk of asset obsolescence, while simultaneously unlocking opportunities for innovation, green investment, and market diversification. During 2024, Scope 1, 2 & 3 emissions have been certified by an accredited third body. Through this process, high quality data acquisition is enhancing our trajectory towards Net Zero.

Adaptation measures are embedded across DESFA's operations to manage both chronic and acute physical climate risks. Long-term environmental changes—such as temperature fluctuations, altered precipitation patterns, humidity shifts, and soil instability—pose threats to pipeline integrity and operational reliability. These chronic stressors may lead to gradual infrastructure degradation, increased maintenance costs, and indirect impacts on energy demand and market dynamics. Acute risks, including extreme weather events such as floods and storms, further threaten infrastructure safety and continuity. While DESFA has successfully managed past incidents, future climate extremes may result in direct damage, service disruptions, and reputational harm. To mitigate these risks, DESFA conducts scenario analyses, risk assessments, and continuous monitoring, while also investing in infrastructure resilience upgrades, emergency response planning, preventive maintenance, and the integration of advanced forecasting tools, ensuring its infrastructure remains robust under evolving climate conditions.

In parallel, DESFA addresses upstream and downstream Scope 3 emissions associated with construction activities and fossil fuel supply chains. DESFA has developed a Vendor's Qualification Procedure containing sustainability criteria for external providers and simultaneously is preparing the Contractor's Environmental Report for the documentation of our partners' environmental footprint (GHG included) and the adoption of mitigation measures on a later stage. By promoting low-emission technologies and engaging suppliers in joint decarbonization efforts, the Company seeks to reduce indirect environmental impacts and strengthen its value chain resilience.

DESFA also views the energy transition as a strategic opportunity. By repurposing existing infrastructure for hydrogen, biomethane, and CO<sub>2</sub> transport, the Company avoids asset stranding and positions itself as a key enabler of Greece's and Europe's climate goals. Proactive alignment with EU regulations, active participation in policy development, and pursuit of sustainable finance mechanisms further reinforce DESFA's leadership in the low-carbon economy.

Through continuous stakeholder engagement, DESFA ensures that climate-related impacts, risks, and opportunities are systematically managed, contributing to the decarbonization of the Greek energy sector.

# 4.1 Climate Change Mitigation and Adaptation

## NET ZERO MASTERPLAN

A-E6  
EM-MD-110a.1, EM-MD-160a.2

DESFA is committed to achieving Carbon Neutrality by 2040, with an interim target of 50% reduction in Scope 1 and Scope 2 emissions by 2030 compared to 2018 levels.

This commitment reflects the Company's alignment with the Paris Agreement and the European Green Deal, supporting the transition to a climate-neutral economy while reinforcing DESFA's role as a responsible energy infrastructure operator.

By pursuing these targets, DESFA addresses climate transition risks such as regulatory compliance pressures, carbon pricing exposure, and the potential obsolescence of natural gas infrastructure, while unlocking opportunities for green investment, innovation, and market diversification.

The Net Zero Master Plan serves as the cornerstone of DESFA's decarbonization strategy. It is updated annually to ensure alignment with:

- Latest operational data and emission factors, ensuring accurate performance tracking.

- Market forecasts and geopolitical developments, which influence energy demand and supply dynamics.
- Decarbonization scenarios and gas demand projections, to anticipate future system requirements.
- The Ten-Year Development Plan (TYDP), integrating infrastructure investments with climate objectives.

To ensure resilience, the plan incorporates scenario analysis, including two extreme cases from a CO<sub>2</sub> emissions perspective, confirming that DESFA's pathway remains robust under varying market and policy conditions. This proactive approach mitigates

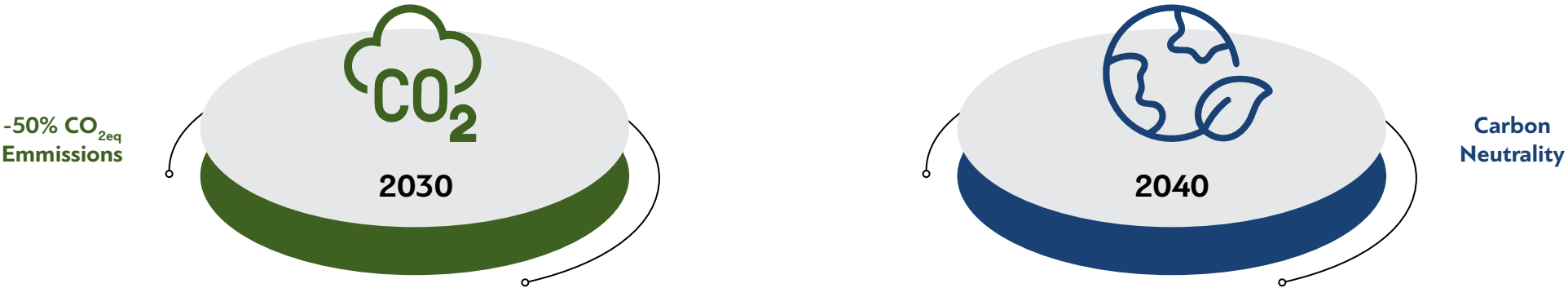


FIGURE 3: DESFA CARBON NEUTRALITY MASTERPLAN

# 4.1 Climate Change Mitigation and Adaptation

policy and strategy risks and strengthens DESFA's ability to adapt to evolving regulatory frameworks.

DESFA's roadmap combines operational improvements, technological innovation, and stakeholder engagement to deliver measurable progress:

- **Investments in Renewable Energy Sources (RES):** Integration of renewable electricity for operations to reduce indirect emissions and energy cost volatility.
- **Development of Green Gases:** Expansion of biomethane and hydrogen infrastructure to enable low-carbon energy transport, reducing dependency on fossil fuels and supporting energy security.

- **Methane Emissions Reduction:** Implementation of OGMP 2.0 best practices and advanced LDAR programs to minimize fugitive emissions, addressing both environmental impact and compliance risk.
- **Fleet Electrification:** Transition to electric and low-emission vehicles to reduce fuel-related emissions and operational costs.
- **Energy Efficiency Projects:** Deployment of ISO 50001-based energy management systems and optimization of energy intensive processes, mitigating financial risks linked to energy price fluctuations.

Further strengthening its decarbonization strategy, DESFA actively addresses Scope 3 emissions by collaborating with contractors, vendors, and service providers through joint action plans, knowledge sharing, and the exchange of best practices. This collaborative approach fosters an environmental culture across the entire value chain and amplifies the overall impact of decarbonization efforts, reducing reputational and compliance risks while creating shared value.

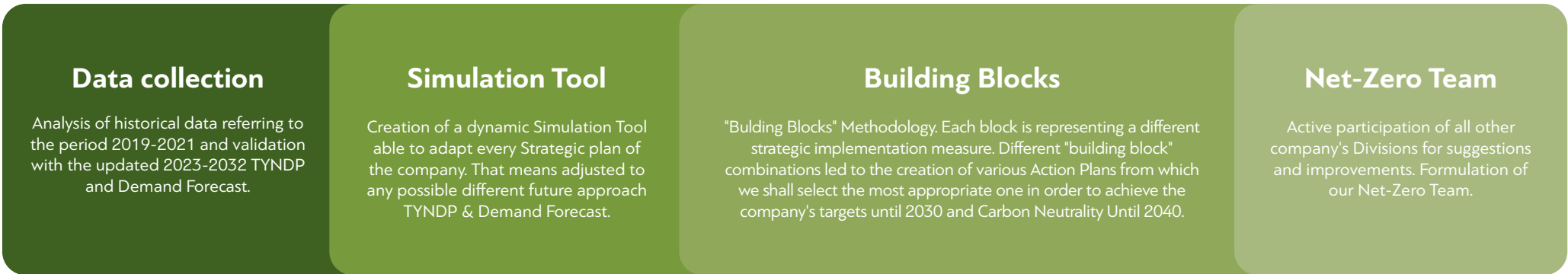


FIGURE 4: NET-ZERO PLAN



## 4.1 Climate Change Mitigation and Adaptation

### METHANE EMISSIONS

#### A-E2

Methane (CH<sub>4</sub>) emissions, represent a critical environmental consideration for DESFA due to the nature of its operations in natural gas transmission. A large part of these are Fugitive emissions, typically arise from unintended leaks or releases from equipment such as valves, compressors, seals, and pipeline joints.

Given methane's high global warming potential and its role as a short-lived climate pollutant, reducing methane emissions is essential for mitigating climate change impacts and addressing transition risks associated with evolving EU methane regulations and carbon pricing mechanisms. At the same time, proactive methane management creates opportunities for regulatory leadership, operational efficiency, and enhanced stakeholder trust.

In alignment with the OGMP 2.0 framework, DESFA has adopted advanced methodologies for methane emissions reporting and reduction. The Company achieved the OGMP2.0 Gold Standard Reporting in 2024, reflecting its commitment to transparency and continuous improvement. This year DESFA submitted the midstream reporting template and implementation plan in May 2025 and received the OGMP2.0 thorough review and positive feedback in August 2025.

DESFA has set a target to achieve 45% reduction in methane emissions by 2025 compared to the 2015 base year. Also, recently the Company set a more ambitious new target to achieve 60% reduction in methane emissions by 2030 compared to 2015. To meet these goals, the Company is implementing a comprehensive program that combines operational best practices, technological upgrades, and enhanced monitoring systems. Key initiatives include:

- **Leak Detection and Repair (LDAR) Campaigns:** DESFA conducts systematic LDAR programs across the NNGS, the LNG Terminal in Revithoussa, and the Compressor Station at Nea Messimvria. These campaigns follow the EN 15446 standard and are supported by DESFA's Work Force Management (WFM) tool for efficient scheduling and reporting. In 2024, LDAR inspections were expanded, and additional personnel were trained to perform in-house measurements, reinforcing DESFA's capacity to detect and address leaks promptly. For LDAR measurements, DESFA uses all instruments recommended by the OGMP 2.0 (FID Analyzer, Hi-flow sampler, OGI Camera).
- **Advanced Measurement and Reconciliation:** DESFA has achieved Level 5 reporting under OGMP 2.0, which includes source-level and site-level measurements and reconciliation for key facilities such as the LNG Terminal and Compressor Station. This approach ensures greater accuracy and reliability in emissions data, supporting compliance and performance benchmarking.
- **Technical Upgrades:** The Company installed a new High-Pressure BOG unit in Revithoussa LNG Terminal to eliminate Flaring. Also, DESFA is going to install a Process and Dry Seal Recompression System at the Nea Messimvria Compressor Station to minimize seal-related leaks. Additionally, mobile recompression units are deployed to reduce gas venting during maintenance activities, in line with industry best practices.
- **Innovation and Enhancements:** DESFA utilizes advanced technologies for top-down site-level measurements, including laser-based detection systems mounted on Drones, to complement ground-based measurements and further enhance monitoring capabilities.

Through these measures, DESFA achieved a 54% reduction in methane emissions in 2024 compared to 2015, demonstrating tangible progress toward its methane reduction target. Continuous improvement remains a priority, with annual reviews of strategy and performance conducted in collaboration with OGMP and internal governance bodies. These efforts not only mitigate environmental impacts but also strengthen DESFA's resilience in a low-carbon economy and position the Company as a leader in methane management.

### EMISSIONS TRADING SYSTEM (ETS)

In accordance with European and Greek legislation, DESFA implements the European Union Emissions Trading System (EU ETS) at its two regulated installations, the LNG Terminal on the island of Revithoussa and the Compressor Station of Nea Messimvria in Thessaloniki.

The EU ETS is a cornerstone of the EU's climate policy, designed to reduce GHG emissions cost-effectively and accelerate the transition to a low-carbon economy. For DESFA, active participation in this mechanism is not only a compliance obligation but also a strategic tool to manage climate transition risks, such as exposure to carbon pricing and evolving regulatory requirements.

## 4.1 Climate Change Mitigation and Adaptation

DESFA has set ambitious targets to ensure full compliance with EU ETS requirements while contributing to the EU's broader emission reduction goals. These targets include:

- Achieving compliance with emissions allowances allocated under the EU ETS, ensuring that emissions do not exceed the permitted cap.
- Implementing measures to gradually reduce emissions over time, aiming to exceed regulatory requirements and strengthen resilience against future policy changes.
- Maintaining Compliance Status "A" in the European Emissions Register through robust monitoring, reporting, and verification practices.

Throughout 2024, DESFA actively engaged in all compliance and monitoring activities required under the EU ETS framework:

- **Continuous Monitoring:** Daily monitoring of relevant parameters was conducted to calculate CO<sub>2</sub> emissions for each source stream and emission source, ensuring accurate and timely reporting.
- **Verified Reporting:** DESFA submitted a Verified Emissions Report, a Declaration of Activity Data, and an Improvement Report to the Ministry of Environment and Energy for each installation.

- **Independent Verification:** The Company successfully underwent Annual Emissions Verification Audits in January 2024 for both the LNG Terminal and the Compressor Station, conducted by an independent accredited body.

- **Procurement of Allowances:** DESFA procured emission allowances to fulfill legislative requirements. The weighted average purchase price of allowances stood at €66.71/EUA, approximately 2,51% higher than the annual average price. To manage price volatility and ensure transparency, DESFA continues to perform monthly purchases of emission allowances, ensuring appropriate allocation of CO<sub>2</sub> costs for users.

By maintaining a strong compliance record and integrating EU ETS obligations into its broader decarbonization strategy, DESFA mitigates its climate transition risk while reinforcing its commitment to sustainability. These efforts align with the Company's Net Zero Master Plan, supporting the EU's long-term climate neutrality objectives and positioning DESFA as a responsible operator in a rapidly evolving energy landscape.





## 4.1 Climate Change Mitigation and Adaptation

### INNOVATION & RENEWABLE GASES

GRI 201-2  
SS-E1, A-E2

Innovation and renewable gases are central to DESFA's strategy for navigating the energy transition and building a resilient, future-ready infrastructure. Through its δ+ Innovation Center, DESFA fosters a culture of technological advancement, operational excellence, and sustainability. The Company actively collaborates with universities, research centers, and startups to accelerate the adoption of cutting-edge solutions, while initiatives like the δεσφα+ Acceleration Program and Call4Ideas promote open innovation and digital transformation. These efforts enhance system safety, efficiency, and adaptability, supporting DESFA's Net Zero Master Plan.

In parallel, DESFA is investing in renewable gases—hydrogen, biomethane, and carbon capture technologies—as key enablers of decarbonization. Hydrogen plays a vital role in sectors that are hard to electrify, and DESFA is developing hydrogen-ready infrastructure, including HPP and cross-border interconnectors. Flagship projects like H2DRIA and SmartSwitch demonstrate its commitment to regional integration and policy alignment, while participation in European alliances reinforces its leadership in shaping the hydrogen economy.

Biomethane complements this strategy by turning organic waste into clean energy, supporting rural development and energy diversification. DESFA is promoting biomethane production, aiming to demonstrate its feasibility and scalability under real operating conditions.

Furthermore, DESFA is pioneering CCUS through the APOLLOCO<sub>2</sub> project, which will establish the first CCS hub in Southeastern Europe. By integrating CO<sub>2</sub> transport and storage into its infrastructure, DESFA addresses hard-to-abate emissions and supports industrial decarbonization.

Together, these innovation and renewable gas initiatives position DESFA as a strategic enabler of Greece's and Europe's low-carbon future, while unlocking new opportunities for growth, investment, and resilience.





## INNOVATION CENTER δesfa+

Innovation is at the heart of DESFA's strategy to navigate the challenges and opportunities of the energy transition. In an era defined by systemic changes in energy systems, DESFA embraces technological advancement as a catalyst for operational excellence, sustainability, and resilience. By fostering a culture of innovation, the Company ensures that its infrastructure remains future-ready, capable of supporting decarbonization pathways while mitigating transition risks and unlocking new growth opportunities.

To drive this vision, DESFA established the Innovation Lab Working Group, which acts as the central hub for promoting collaboration with universities, research centers, and startups. Through the δesfa+ Acceleration Program, an open innovation initiative, DESFA implements its corporate innovation strategy by scouting, evaluating, and developing ideas that address emerging industry challenges. This approach not only accelerates the adoption of cutting-edge technologies but also strengthens DESFA's ability to anticipate regulatory and market shifts, reducing exposure to compliance and technology risks.

Within this framework, DESFA identifies strategic priorities and launches targeted projects that align with its long-term objectives. Recent collaborations with academic and research institutions include initiatives such as hydrogen injection simulation in gas networks, incident investigation using finite element analysis, gas demand forecasting systems, earth observation surface motion mapping for pipeline integrity via Interferometric Synthetic Aperture Radar (InSAR), and smart contract applications. These projects directly support DESFA's efforts to integrate renewable gases, enhance system safety, and improve operational efficiency—key elements in addressing climate transition risks and ensuring infrastructure adaptability.

In 2024, the Innovation Lab, through the δesfa+ Innovation Center, launched its first Call4Ideas, attracting more than 20 proposals across two focus areas: ICT and Facility & Fleet Management. Following a rigorous evaluation process, two startups were selected to develop Proof of Concept (PoC) solutions: one focused on optimizing business processes through ICT innovation and the other on smart building management. Building on this success, in 2025 DESFA completed its second Call4Ideas, which received more than 30 proposals in the areas of Environmental Management Applications, Digital Wellbeing and Onboarding, and Gas Grid Evolution. Several PoCs are now being designed, further demonstrating DESFA's commitment to leveraging digitalization and smart technologies to improve energy efficiency, reduce operational costs, and enhance resilience.

Beyond internal projects, DESFA actively promotes knowledge exchange and ecosystem development. In partnership with the Hellenic Federation of Enterprises (SEV), the Company organized a Business Day Action event, bringing together startups, research institutions, and established corporations. This platform facilitated dialogue on breakthrough technologies and business models, reinforcing DESFA's role as a forward-thinking organization committed to shaping the future of energy infrastructure.

Furthermore, DESFA proudly participates in TSO's Innovation Club, a collaborative platform that brings together TSOs committed to shaping the future of the energy sector. Through this initiative, DESFA strengthens its role in co-creating innovative solutions, sharing expertise, and accelerating the adoption of new technologies across European energy networks. Participation in the TSO Innovation Club reflects DESFA's dedication to continuous improvement, digital transformation, and the development of a smarter, cleaner, and more resilient energy infrastructure.

By working alongside other TSOs, research bodies, and innovation partners, DESFA contributes to initiatives that enhance system efficiency, support decarbonization, and enable the integration of emerging technologies. Through the TSO Innovation Club, DESFA actively supports the evolution of Europe's energy landscape. The company's participation reinforces its strategic commitment to open innovation, cross-border collaboration, and the development of cutting-edge solutions that ensure a sustainable energy future. Other members that are participating include SNAM, NATRAN, ENAGAS, OGE, TERECA, FLUXYS, THYSENGAS, GASUNIE.

By embedding innovation into its core strategy, DESFA not only addresses current operational challenges but also positions itself to capitalize on emerging opportunities in hydrogen, biomethane, and digital transformation. These efforts align with the Company's Net Zero Master Plan and its ambition to remain a trusted partner in Greece's and Europe's sustainable energy future.

## 4.1 Climate Change Mitigation and Adaptation

### RENEWABLE GASES HYDROGEN

Hydrogen is a key pillar of global decarbonization, especially for sectors that are hard to abate, such as heavy transport, shipping, and energy-intensive industries like steelmaking and chemical production. Renewable hydrogen, produced via electrolysis using renewable energy, is particularly important for Europe, as it helps integrate variable renewables, eases grid congestion, and provides long-term energy storage and system flexibility.

At both national and EU levels, hydrogen is central to achieving climate neutrality targets, and DESFA is committed to advancing this transformation. Developing hydrogen-ready transmission infrastructure is essential for creating a competitive and integrated market that guarantees equal access, enhances energy security, and reduces emissions. This strategic direction directly addresses climate transition and mitigation risks, such as the potential obsolescence of natural gas infrastructure and exposure to carbon pricing, while unlocking opportunities for asset transformation, regulatory leadership, and sustainable investment.

Leveraging its extensive experience in gas networks, DESFA is designing and constructing pipelines capable of transporting up to 100% hydrogen. These include dedicated hydrogen infrastructure, such as the H2DRIA (the Greek hydrogen backbone), the Komnina-Florovouni and the Amintaio-Komnina pipeline, as well as natural gas infrastructure that can be used as hydrogen in the future, such as the Karperi-Komotini, Western Macedonia, and Patras HPP, as well as the planned interconnector with North Macedonia. By future-proofing its infrastructure, DESFA mitigates the risk of stranded assets and positions itself as a key enabler of the hydrogen economy in Southeastern Europe.

#### PROJECT H2DRIA

In 2024, DESFA advanced H2DRIA, a flagship initiative included in the European Commission's PCI/Projects of Mutual Interest (PMI) list under the Hydrogen Interconnections in Central

Eastern and Southeastern Europe (HI East) corridor. The project envisions a dedicated hydrogen pipeline of approximately 570 km from Greece to the Bulgarian border, with an estimated investment of €1 billion.

This infrastructure will facilitate the large-scale transport of renewable hydrogen, supporting the decarbonization of energy systems and strengthening regional integration. To further assess market readiness, DESFA and Bulgartransgaz launched a non-binding H2 Call of Interest, which confirmed strong industry engagement and highlighted Greece's potential as a future hydrogen exporter.

In this respect H2DRIA, will be able to enable hydrogen exports towards Central Europe through its connection with the relevant PCI project promoted by Bulgartransgaz. Both projects are part of the South-Eastern European Hydrogen Corridor (SEEHyC), an initiative of 8 European Transmission System Operators driven by the vision to secure green hydrogen supply to South-East and Central Europe. Also H2DRIA, through its connection with the Italian hydrogen transmission system, the Komnina-Florovouni pipeline, will be able to export hydrogen towards Central Europe through an alternative route, thus strengthening the Europe's energy security and diversification of supply.

These developments demonstrate DESFA's proactive approach to policy alignment and strategic positioning, ensuring resilience in a carbon-free economy.

#### PROJECT SMARTSWITCH

In parallel, DESFA and Bulgartransgaz submitted the SmartSwitch Project under the European Commission's PCI/PMI application process. This initiative focuses on modernizing and digitalizing the Greek and Bulgarian gas networks to enable hydrogen blending of up to 10% into the natural gas system.

By enhancing interoperability and operational flexibility, SmartSwitch supports the gradual integration of renewable gases while maintaining system reliability and safety. This

project exemplifies DESFA's commitment to innovation and risk mitigation, ensuring that its infrastructure remains adaptable to evolving market and regulatory conditions.

### NETWORKING AND COLLABORATIONS

#### GRI SECTOR STANDARD REF. NO. 11.2.4

Beyond these projects, DESFA actively participates in leading European initiatives shaping the hydrogen landscape, including the European Hydrogen Backbone (EHB), Gas for Climate (GfC), the European Clean Hydrogen Alliance, and the SEEHyC. Also, DESFA participated actively in the foundation process of the European Network of Network Operators for Hydrogen (ENNOH) and is one of the founding members of the organization. In this regard, the company is well placed at the center promoting cross-border collaboration efforts and harmonizing standards for hydrogen transmission.

By investing in hydrogen infrastructure, DESFA not only contributes to Greece's and Europe's decarbonization objectives but also mitigates long-term transition risks and capitalizes on emerging opportunities. These efforts align with DESFA's Net Zero Master Plan, ensuring that the Company remains at the forefront of the energy transition while delivering sustainable value to stakeholders.

### BIOMETHANE

Biomethane is a cornerstone of the circular economy and a key enabler of the green transition, delivering substantial environmental benefits by reducing GHG emissions and converting organic waste into renewable energy.

Beyond its environmental advantages, biomethane strengthens energy security by diversifying energy sources and reducing reliance on imported fossil fuels. Its production and integration into the energy system also stimulate economic growth, particularly in rural areas, by creating jobs and supporting local communities.

## 4.1 Climate Change Mitigation and Adaptation

As the operator of the NNGS, DESFA plays a pivotal role in enabling the integration and transportation of biomethane within Greece's energy infrastructure. By ensuring the safe and efficient delivery of renewable gases from production sites to end users, DESFA supports the country's energy diversification strategy and contributes to the resilience of the national energy system.

To facilitate this transition, DESFA actively participates in shaping the regulatory framework required for biomethane injection into the grid. The Company collaborates with national authorities, European institutions, and industry stakeholders to promote the adoption of renewable gases and ensure alignment with EU decarbonization objectives. Through modernization and targeted expansion of the transmission network, DESFA is preparing its infrastructure to accommodate increasing volumes of biomethane and other green gases, reinforcing its role as a strategic enabler of the low-carbon economy.

Building on this vision, DESFA explored the opportunity to develop a Biomethane Project, developed in cooperation with strategic partners and supported by the expertise of its shareholders. The project aimed to establish a state-of-the-art biomethane production facility designed to test and demonstrate the feasibility and performance of biomethane under real operating conditions.

In 2024, as the project entered the land-acquisition phase for the Biomethane plant, one of the MoU partners chose not to proceed with the first binding commitment due to regulatory and legal uncertainties and associated delays. With the concurrence of the second stakeholder, the Northern Greece plant has therefore been put on hold.

In parallel, the new biomethane legislative framework was under consultation, and DESFA was collaborating with biogas producers evaluating the conversion of their units to biomethane plants, focusing on grid-connection issues.

By investing in the opening of the biomethane market, DESFA mitigates transition risks associated with the decarbonization of the energy sector while unlocking new opportunities for growth and innovation. This initiative aligns with the Company's Net Zero Master Plan and the European Green Deal, positioning DESFA as a key player in the development of a sustainable, diversified, and competitive energy market.

### CARBON CAPTURE, UTILIZATION & STORAGE

CCUS technologies are increasingly recognized as essential in accelerating the energy transition and the decarbonization of hard-to-abate sectors. They complement hydrogen and other renewable gas solutions, while directly mitigating CO<sub>2</sub> emissions and enabling a gradual shift away from fossil fuels.

In light of this strategic importance, DESFA is actively positioning itself as a key player in the emerging CCUS market, leveraging strong operational synergies with its core expertise in natural gas, transportation, regasification and storage. Building on its extensive experience in gas infrastructure, DESFA is pursuing the development of the first large-scale CCS hub in Southeastern Europe, aiming to become a critical enabler for industrial decarbonization in the region.

This initiative directly addresses the challenge of reducing hard-to-abate emissions in energy-intensive sectors by offering an integrated, centralized midstream solution for the aggregation, transportation, and handling of captured CO<sub>2</sub>. In doing so, DESFA contributes to mitigating climate impacts and reducing the risk of stranded assets in a rapidly decarbonizing economy.

Central to this strategy is the APOLLOCO<sub>2</sub> project, which aims to establish the region's first CCS hub. The project envisions aggregating captured CO<sub>2</sub> from industrial emitters in Attica and Central Greece, transporting it via a dedicated CO<sub>2</sub> pipeline network, and delivering it to a central liquefaction terminal on Revithoussa island. There, applying innovative technologies

to exploit the "cold energy" of the existing Revithoussa LNG regasification terminal, the CO<sub>2</sub> will be liquefied and temporarily stored upon its shipping to permanent storage sites either within Greece or abroad.

This approach not only supports Greece's National Energy and Climate Plan (NECP) but also aligns with the EU Industrial Carbon Management Strategy, which highlights CCS hubs and cross-border CO<sub>2</sub> networks as vital components for achieving the EU's 2050 climate neutrality target.

The APOLLOCO<sub>2</sub> project is included in the 1<sup>st</sup> PCI/PMI List under the revised TEN-E Regulation, published in November 2023, as part of PCI No. 13.11 ("[Prinos – Offshore storage at Prinos field for emissions from EL, by pipeline, and from BG, HR, CY, EL, IT, and SI by ship](#)"), while it was resubmitted for the next PCI/PMI Lists in December 2024.

Progressing along this strategic path, DESFA completed pre-feasibility and Front-End Engineering Design (FEED) studies for the midstream segment of the CCUS value chain during 2023 and 2024, while at the same time the discussions are maturing with all the relevant stakeholders of this niche market.

By investing in CCUS, DESFA effectively mitigates transition risks such as regulatory compliance pressures, carbon pricing exposure, and the potential obsolescence of natural gas infrastructure. Simultaneously, it seizes strategic opportunities including, early alignment with EU decarbonization policies, access to green investment and innovation funding, and diversification into a new service line in which DESFA already has significant experience and that supports industrial clients in meeting their climate targets.

Through APOLLOCO<sub>2</sub> and related initiatives, DESFA reinforces its role as a catalyst for a low-carbon economy, generating long-term value for stakeholders while actively contributing to Greece's and Europe's climate goals.



## 4.2 Carbon Footprint and Energy

### CALCULATION, MONITORING AND VERIFICATION

DESFA applies a robust and structured approach to the calculation, monitoring, and verification of its GHG emissions according to ISO 14064-1:2018, ensuring the capacity of the Company to respond emission related disclosures from reporting standards, including GRI Standards 2021, the ATHEX ESG Reporting Guide 2024 and the SASB Standard «Oil and Gas - Midstream 2018».

### METHODOLOGY AND CALCULATION PRINCIPLES

Calculation methodology covers Scope 1 (direct emissions), Scope 2 (indirect emissions from purchased electricity), and Scope 3 (value chain emissions), where applicable, in accordance with the GHG Protocol, Corporate Value Chain (Scope 3) Accounting and Reporting Standard, 2011 in particular, the calculation approach includes:

#### SCOPE 1 – DIRECT EMISSIONS

Emissions from combustion and process sources, as well as fugitive emissions from the NNGS. These include:

- Natural gas combustion in:
  - High-Performance Combined Heat and Power (CHP) units
  - SCVs
  - Flare pilots and LNG Terminal flue gas flare
  - Compressor unit operations
- Controlled venting during maintenance and operation
- Pneumatic equipment operation
- Fugitive emissions from pipelines and facilities
- Fuel consumption by vehicles, machinery, generators and air compressors

#### SCOPE 2 – INDIRECT EMISSIONS

Emissions from electricity purchased and consumed by DESFA's infrastructure, calculated using location-based and market-based methods.

#### SCOPE 3 – VALUE CHAIN EMISSIONS

Indirect emissions from upstream and downstream activities, including procurement, transportation and business travel. These are assessed using the GHG Protocol Corporate Value Chain (Scope 3) Standard across 15 categories (8 applicable for DESFA).



## 4.2 Carbon Footprint and Energy

### CALCULATION PARAMETERS

To ensure accuracy and alignment with international best practices, DESFA applies a combination of recognized standards, tools and data sources for the calculation of GHG emissions:

- Methods
  - Monitoring and Metering (MM): Based on data from calibrated instruments installed at consumption points.
  - Emission Factors: Applying appropriate conversion factors to resource consumption data.
- Standards & Frameworks
  - ISO 14064-1:2018 "Part 1: Specification with guidance at the organization level for quantification and reporting of GHG emissions and removals"
  - GHG Protocol
  - Guidelines from the MEEN
- Tools Utilized
  - ETS Calculation Tool
  - Carbon Footprint Tool
- Emission Factor Sources
  - MEEN
  - UK Department for Environment, Food and Rural Affairs (DEFRA 2024)
  - US Environmental Protection Agency (USEPA 2024)

- Additional Data Sources
  - Energy Mix of Suppliers (2024) from the Hellenic Operator of Renewable Energy Sources and Guarantees of Origin

This integrated approach ensures that DESFA's GHG emissions reporting is transparent, consistent and compliant with both national and international standards.

### MONITORING AND VERIFICATION

DESFA has established integrated monitoring systems across its operational sites to ensure real-time data collection, traceability and robust quality control. Key components of this framework include:

- Continuous Monitoring: Daily tracking of energy consumption and emissions parameters at critical facilities, such as the LNG Terminal and the Nea Messimvria Compressor Station.
- LDAR Technologies: Implementation of Leak Detection and Repair programs for methane emissions, supporting OGMP 2.0 Level 5 reporting requirements.
- Digital Solutions: Deployment of WFM systems and automated data transfer tools to enhance accuracy, efficiency and data integrity.

Monitoring protocols are regularly reviewed and updated to reflect technological advancements and evolving regulatory requirements, ensuring alignment with best practices.

To guarantee the credibility and transparency of its GHG

disclosures, DESFA engages independent, accredited verification bodies to conduct annual audits. This process includes:

- Submission of Verified Emissions Reports, Declarations of Activity Data and Improvement Reports to the Hellenic Ministry of Environment and Energy.
- Annual Emissions Verification Audits performed by third-party auditors.

These verifications confirm compliance with the EU ETS obligations for the LNG Terminal and the Nea Messimvria Compressor Station, as well as adherence to ISO 14064-1:2018 requirements for organizational GHG inventories (Scope 1, 2 & 3).

### PERFORMANCE EVALUATION AND REPORTING

Emissions performance is evaluated annually and benchmarked against sectoral and national targets. These disclosures include absolute emissions, intensity ratios, and progress toward reduction targets. Results are annually disclosed in DESFA's Carbon Footprint Report and integrated into DESFA's Net Zero Master Plan, which guides strategic decisions on energy efficiency, methane reduction, and renewable integration. Annual energy performance is reported within DESFA's Energy Review Report (according to the requirements of ISO 50001).

The calculation and verification of emissions are not standalone activities but form part of DESFA's broader sustainability strategy. By embedding emissions management into operational planning and governance, DESFA ensures compliance, enhances transparency, and reinforces its role as a responsible energy infrastructure operator.

## 4.2 Carbon Footprint and Energy

GREENHOUSE GAS EMISSIONS AND INTENSITY  
A-E8

During the 2024 reporting period, DESFA's total GHG emissions amounted to 140.893,33 tCO<sub>2</sub>e, reflecting a 11,87% decrease compared to 159.872,01 tCO<sub>2</sub>e in 2023. This overall reduction is primarily attributed to a significant decline in Scope 3 emissions, which offset increases observed in Scope 1 emissions.

SCOPE 1 EMISSIONS  
GRI 305-1, C-E1, EM-MD-110a.1

In 2024, Scope 1 emissions totaled 69.331,01 tCO<sub>2</sub>e, reflecting a significant 161,43% increase compared to the 26.520,21 tCO<sub>2</sub>e

reported in 2023. This notable rise is primarily attributed to operational conditions that intensified direct emissions from gas combustion.

In particular, the increase in flaring at the Revithoussa LNG Terminal played a major role, driven by the limited quantities of LNG processed during the year. Furthermore, natural gas consumption at the Nea Messimvria Compressor Station rose considerably due to the transfer of substantial gas volumes from northern entry points to the southern zone. These developments collectively contributed to the escalation in emissions, highlighting the impact of infrastructure utilization and energy flow dynamics on the company's carbon footprint.

SCOPE 2 EMISSIONS  
GRI 305-2, C-E2

In 2024, Scope 2 market-based emissions decreased significantly to 8.654,37 tCO<sub>2</sub>e, down from 16.407,99 tCO<sub>2</sub>e in 2023—representing a 47,26% reduction. Accordingly, location-based emissions also declined, reaching 11.699,98 tCO<sub>2</sub>e, which corresponds to a 48,04% decrease compared to the previous year.

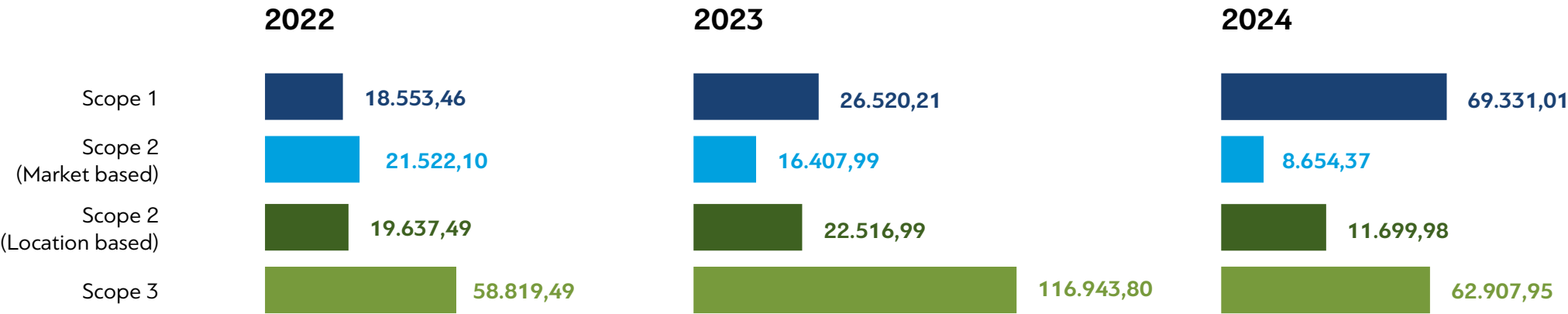


CHART 3: GHG EMISSIONS PER SCOPE (tCO<sub>2</sub>e)

Note: More information can be found in Unit 7.1. "Key ESG Performance Indicators (KPIs)".



## 4.2 Carbon Footprint and Energy

This improvement is primarily attributed to a combination of factors that contributed to lower indirect emissions from electricity consumption. Reduced electricity demand at the LNG Terminal, resulting from lower LNG gasification levels, played a key role.

Furthermore, the company procured Guarantees of Origin equivalent to 9.000.000 MJ of renewable electricity, reinforcing its commitment to clean energy sourcing. Additionally, the declining emission factor of the national electricity grid, aligned with the objectives of the NECP, further supported the overall reduction in market-based emissions.

### SCOPE 3 EMISSIONS GRI 305-3, A-E1

In 2024, Scope 3 emissions were significantly reduced to 62.907,95 tCO<sub>2</sub>e, marking a 46,21% decrease compared to the 116.943,80 tCO<sub>2</sub>e recorded in 2023. This reduction is primarily linked to changes in the company's investment and procurement profile, which led to lower indirect emissions across key categories.

A notable decline in expenditure on capital-intensive projects and procurement activities contributed to this outcome. Furthermore, emissions associated with the categories

“Purchased Goods and Services” and “Capital Goods”—DESFA’s two most material Scope 3 categories—were substantially lower. This trend reflects a shift in the investment landscape in 2024, which contrasted with the previous year’s major infrastructure developments, including compressor stations, metering stations, and LNG terminal upgrades.

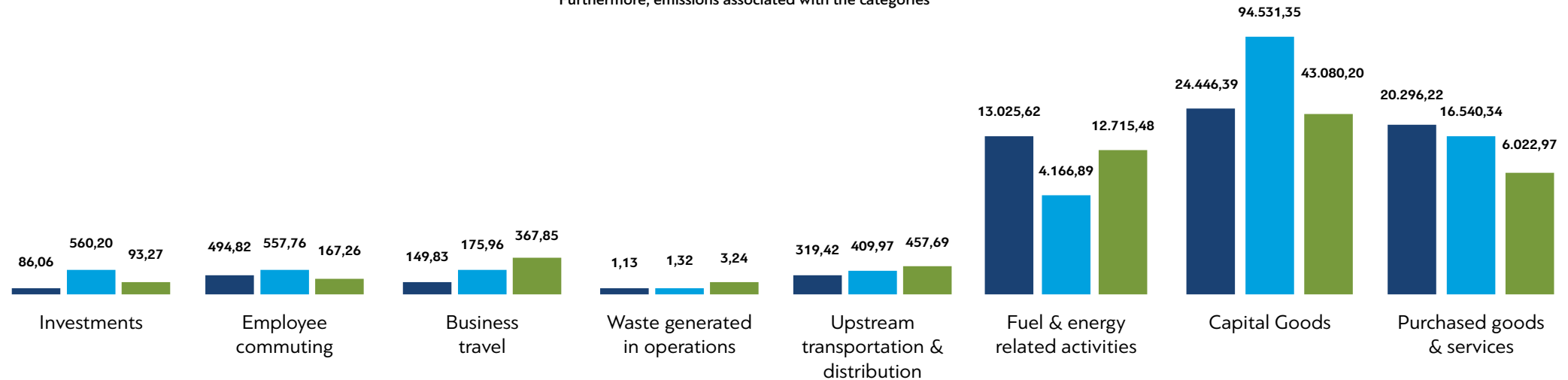


CHART 4: OTHER INDIRECT (SCOPE 3) GHG EMISSIONS SEGMENTATION (tCO<sub>2</sub>e)

Note: More information can be found in Unit 7.1. “Key ESG Performance Indicators (KPIs)”.

## 4.2 Carbon Footprint and Energy

### GHG EMISSIONS INTENSITY

#### GRI 305-4

#### C-E1, C-E2

DESFA monitors and reports its emissions intensity ratios in alignment with international best practices and national ESG criteria, using the volume of natural gas transferred ( $\text{Nm}^3$ ) as the denominator factor. These ratios reflect the efficiency of operations in terms of greenhouse gas emissions per unit of transferred energy and are segmented across Scope 1, Scope 2 (location-based and market-based) and Scope 3 emissions. In 2024, the emissions intensity ratios showed a mixed trend compared to 2023, driven by operational shifts and energy sourcing strategies:

- Scope 1 intensity ratio increased significantly to  $11,99 \text{ gr CO}_2\text{e/Nm}^3$ , up from  $5,71 \text{ gr CO}_2\text{e/Nm}^3$  in 2023. This rise is consistent with the elevated Scope 1 emissions due to increased flaring and compressor station activity.
- Scope 2 intensity ratio (location-based) decreased to  $2,02 \text{ gr CO}_2\text{e/Nm}^3$ , compared to  $4,85 \text{ gr CO}_2\text{e/Nm}^3$  in 2023, reflecting reduced electricity consumption and a lower grid emission factor.
- Scope 2 intensity ratio (market-based) also declined to  $1,50 \text{ gr CO}_2\text{e/Nm}^3$ , down from  $3,53 \text{ gr CO}_2\text{e/Nm}^3$ , supported by the purchase of Guarantees of Origin for renewable electricity.
- Scope 3 intensity ratio dropped to  $10,88 \text{ gr CO}_2\text{e/Nm}^3$ , from  $25,19 \text{ gr CO}_2\text{e/Nm}^3$  in 2023, due to reduced procurement and capital expenditures.
- The total GHG emissions intensity ratio (Scope 1, Scope 2 location-based and Scope 3) decreased to  $24,90 \text{ gr CO}_2\text{e/Nm}^3$ , from  $35,75 \text{ gr CO}_2\text{e/Nm}^3$  in 2023.
- Similarly, the total GHG emissions intensity ratio (Scope 1, Scope 2 market-based and Scope 3) fell to  $24,37 \text{ gr CO}_2\text{e/Nm}^3$ , compared to  $34,44 \text{ gr CO}_2\text{e/Nm}^3$  in the previous year.

### ENERGY EFFICIENCY

Energy efficiency is a strategic priority for DESFA, underpinning its commitment to operational excellence, cost optimization and sustainable development. In an evolving energy landscape, improving energy performance is not only an ethical imperative but also a key driver of competitiveness and resilience. DESFA's approach combines international best practices with structured internal processes to ensure that energy resources are managed responsibly and efficiently across all operations.

To achieve these objectives, DESFA has adopted the ISO 50001 Energy Management Standard, creating a systematic framework for continuous improvement in energy performance. This framework enables the Company to identify inefficiencies, optimize processes, and embed energy-conscious practices throughout its organizational culture. The implementation of ISO 50001 reflects DESFA's commitment to aligning with globally recognized standards and enhancing transparency in energy management. In that framework, each year DESFA discloses its Energy Review Report containing all available information regarding the company's energy profile.







## ENERGY MANAGEMENT SYSTEM

To support its ISO 50001 implementation and drive continuous improvement in energy performance, DESFA has established a set of core practices and structures. These reflect its commitment to responsible energy use and operational efficiency, and are implemented through the following actions:

- **Energy Audits and Assessment**

DESFA conducts comprehensive energy audits and assessments to identify areas of energy wastage, inefficiencies, and opportunities for improvement.

- **Establishing Energy Management Systems**

DESFA has developed and implemented a robust Energy Management System based on the ISO 50001 standard. This involves setting energy performance indicators (EnPIs), defining objectives, and establishing processes for monitoring, measuring, and analyzing energy consumption.

- **Establishment of the Energy Management Team**

DESFA has established a cross-functional Energy Management Team (Net-Zero Team) with participants from all divisions to propose future energy efficiency projects and monitor those already in progress. All future & current energy related projects are annually reviewed by the Top Management.

- **Employee Engagement and Training**

DESFA engages employees at all levels and provides targeted training to raise awareness about energy conservation practices, encourage behavioral change, and foster a culture of energy efficiency throughout the organization. All energy aspects have been included within the company's certified Competence Management System (CMS) Training System.

- **Risk Assessment**

DESFA identifies and assesses various types of risks and opportunities related to its energy efficiency strategy, including operational, financial, compliance, and human factors.

- **Investing in Energy-Efficient Technologies**

DESFA invests in energy-efficient technologies and equipment, optimizes operations, and explores renewable energy options to reduce energy consumption and carbon emissions.



## 4.2 Carbon Footprint and Energy

### ONGOING AND PLANNED INITIATIVES

DESFA has issued the annual Energy Review Report, providing an energy assessment for the past year and presenting key data and insights into the company's energy consumption and performance. The report outlines proposed measures for improving energy efficiency, reviews the progress of ongoing and upcoming projects, and includes ideas and proposals for future initiatives that could further enhance the company's energy-saving efforts.

Further actions include the installation of a Boil-Off Gas Compressor at the LNG Terminal, designed to enhance energy recovery and reduce losses; the monitoring of CO<sub>2</sub> emissions;

and the initiation of the ISO 50001 Energy Management System, which lays the foundation for structured energy performance improvements.

In addition, DESFA has approved the study of four future energy efficiency projects. These include the installation of smart meters, the replacement of SCVs with ORVs, the development of a hydroelectric station at the LNG Terminal, and the digitalization of the data transfer system to enable real-time monitoring and optimization of energy flows.

Through these initiatives, DESFA is building a strong foundation for energy efficiency, ensuring that its infrastructure remains future-proof and aligned with the principles of sustainable

energy management. By integrating ISO 50001 into its operational framework and investing in innovative technologies, DESFA not only reduces energy consumption and operational costs but also reinforces its role as a responsible operator committed to long-term value creation.

### ENERGY CONSUMPTION AND INTENSITY

GRI 302-1, GRI 302-3  
C-E3

In 2024, DESFA's total energy consumption amounted to 1.335.138.682,36 MJ, marking a significant increase of 144,55% compared to 545.960.440,21 MJ recorded in 2023. This sharp rise is primarily attributed to operational factors that notably

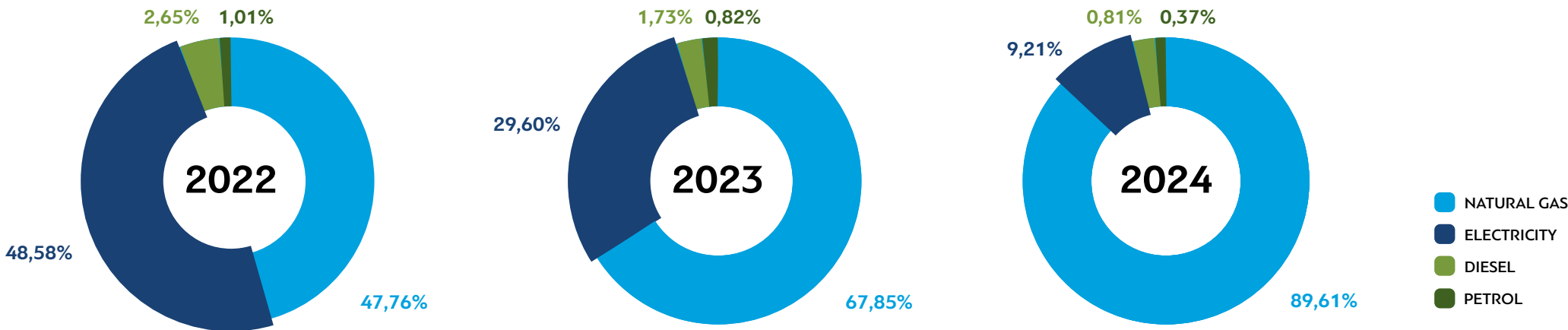


CHART 5: ENERGY CONSUMPTION SEGMENTATION

**Note:** In 2024 and 2023, DESFA consumed limited quantities of CNG as well LNG for 2024, which are not presented in percentage segmentation due to their minimal contribution to overall energy consumption. However, the actual consumption values are included in the relevant table under GRI 302-1 indicator "Energy consumption within the organization", located in unit 7.1. "Key ESG Performance Indicators (KPIs)".

## 4.2 Carbon Footprint and Energy

influenced the energy mix and overall consumption patterns. Specifically, Natural gas remained the dominant energy source, accounting for 89,61% of total consumption in 2024, followed by electricity (9,21%), diesel (0,81%), and petrol (0,37%).

Compared to 2023, the most pronounced change was observed in natural gas consumption, which surged from 370.450.657,83 MJ in 2023 to 1.196.401.254,98 MJ in 2024, representing an increase of 222,96%. This escalation was primarily driven by the limited LNG quantities processed through the LNG Terminal, which led to extensive flaring activities and consequently elevated energy use<sup>11</sup>. Additionally, the transfer of substantial natural gas volumes from northern entry points to the southern zone intensified operational demand at the Nea Messimvria

Compressor Station, further contributing to the overall increase.

In contrast, electricity consumption experienced a notable decline of 23,88%, decreasing from 162.025.241,32 MJ in 2023 to 123.339.283,35 MJ in 2024. This reduction is mainly attributed to lower LNG gasification levels at the LNG Terminal. Reinforcing its commitment to sustainable energy sourcing, DESFA also purchased Guarantees of Origin equivalent to 9.000.000 MJ of electricity from its provider during 2024.

Moreover, energy sold decreased from 430.826,40 MJ in 2023 to 328.237,20 MJ in 2024, reflecting the reduced operation of the CHP Unit, which was impacted by frequent shutdowns at the LNG Terminal.

DESFA determines its energy intensity ratio by dividing the total energy consumed within the organization—including fuels, electricity, and heating—by the denominator factor, defined as the volume of natural gas transferred, expressed in MJ per Nm<sup>3</sup>.

In 2024, the energy intensity ratio rose to 0.23 MJ/Nm<sup>3</sup>, compared to 0.12 MJ/Nm<sup>3</sup> in 2023, despite a 24.53% increase in the denominator factor—from 4,642,266,012.00 Nm<sup>3</sup> in 2023 to 5,781,086,585.30 Nm<sup>3</sup> in 2024. This upward trend in energy intensity is primarily attributed to the substantial increase in total energy consumption, which outpaced the growth in operational throughput.

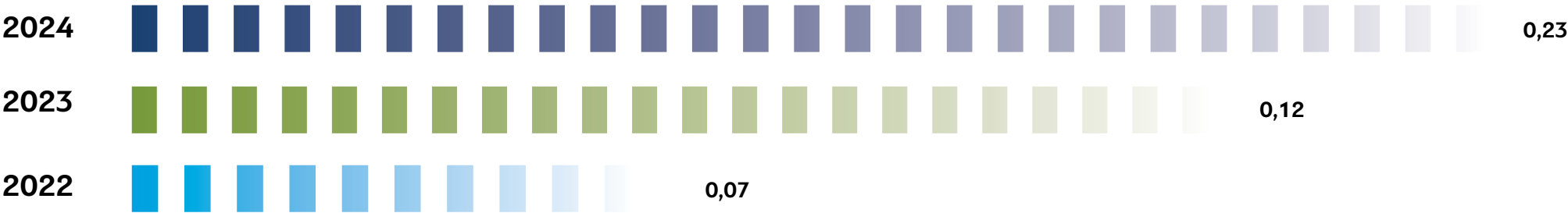


CHART 6: ENERGY INTENSITY (MJ/NM<sup>3</sup>)

Note: More information can be found in Unit 7.1. “Key ESG Performance Indicators (KPIs)”.

<sup>11</sup> DESFA has started the process for BOG compressors to diminish the extensive flaring activities, and therefore diminish the emissions.

## 4.3 Biodiversity and Ecosystem Impacts



**MATERIAL TOPIC: BIODIVERSITY**  
**IMPACT: LAND ECOSYSTEM USE CHANGE**  
**IMPACT: DISTURBANCES**  
**RISK: NATURE IMPACT TRANSITION RISK**

### GRI 3-3

DESFA's operations, particularly the development and management of high-pressure natural gas infrastructure, intersect with terrestrial ecosystems and, in certain cases, ecologically sensitive areas. The company acknowledges that its activities, especially during construction, can lead to land use patterns modification, habitat disturbances and pressures on local biodiversity. These impacts are mostly present during construction phase, induced by vegetation clearing, soil disruption, and also during operation through the imposition of permanent land use restrictions within defined pipeline corridors.

Apart from ecological impacts induced by DESFA's activities, DESFA faces growing nature-related transition risks. These include potential regulatory constraints, financial liabilities, and reputational pressures stemming from the increased need for protection of biodiversity and ecosystem services. As European and national environmental regulations evolve, infrastructure projects are increasingly subject to stricter permitting requirements and stakeholder scrutiny. Failure to align with nature-positive practices and corporate commitments could result in project delays, increased compliance costs, or reduced access to sustainable financing.

Recognizing these challenges, DESFA has embedded biodiversity protection into its broader environmental and operational strategy. The company applies targeted mitigation measures across all project phases, including biodiversity-sensitive route planning, restoration

of disturbed areas, and vegetation management protocols that balance safety with ecological continuity. Construction techniques are adapted to minimize disruption, and operational practices are designed to reduce noise, light, or other emissions that could affect local fauna, as also communities.

DESFA places strong emphasis on inclusive and transparent stakeholder engagement as a core element of its environmental protection strategy. This approach encompasses both natural parameters—abiotic and biotic—as well as biodiversity considerations, while also integrating key social aspects. Structured engagement plans are developed for each project, incorporating consultations with local authorities, landowners, and vulnerable groups. Feedback from these engagement activities informs project design and mitigation strategies, ensuring that local community concerns and ecological values are addressed and respected. Formal grievance mechanisms and continuous monitoring further support responsive and accountable projects' operations.

Through this integrated approach, DESFA aims to mitigate biodiversity-related impacts and risks while enhancing its operational resilience and environmental performance. The company's commitment to responsible infrastructure development is reflected in its adherence to national and EU environmental standards, its alignment with stakeholder expectations, and its contribution to Greece's sustainable energy transition.





## 4.3 Biodiversity and Ecosystem Impacts

### NNGS WITHIN PROTECTED AREAS

GRI 304-1, GRI 304-2  
A-E5  
EM-MD-160a.2

During Environmental Permitting of new projects (through compilation of EIA), DESFA systematically records the presence of protected areas and zones of high biodiversity value along its footprint and assess impacts on sensitive features, implementing tailor-made mitigation measures, ensuring full compliance with national legislation and European Union directives. Assessments also take into consideration international frameworks such as the International Union for Conservation of Nature (IUCN) Protected Area Management Categories and the Ramsar Convention, reinforcing DESFA's commitment to global environmental standards and biodiversity protection.

Project design and early stakeholder engagement play a critical role in minimizing ecological impact. Through careful planning and timely consultation with competent authorities, DESFA is able to avoid most protected areas. As a result, the majority of its infrastructure is located outside formally designated conservation zones. Indicatively, in 2024, DESFA advanced several strategic infrastructure projects, including the West Macedonia HPP and preparatory works for future developments such as the Interconnection Greece–North Macedonia (IGNM) pipeline. These two pipeline projects, which are essential for enhancing energy security and supporting the energy transition, have been carefully designed to avoid crossing any protected areas.

In particular, regarding all existing and under construction

DESFA's projects for 2024, Permanent Above Ground Installations (AGIs) occupy approximately 1,49 km<sup>2</sup>, with individual sites ranging from 5.000 m<sup>2</sup> for Block Valve Stations to larger areas for Compressor Stations. Including both the Pipeline Protection Strip (PPS)<sup>12</sup> and AGIs, the total estimated footprint of DESFA's infrastructure amounts to 17,08 km<sup>2</sup>.

However, given the extensive reach of DESFA's network—spanning approximately 1.465 km of high-pressure pipelines and multiple AGIs, including Metering and Regulating Stations, Compressor Stations, and Block Valve Stations— routes of 99,2 km of NNGS inevitably traverse or border regions of ecological interest, such as agricultural land, forested areas, and biodiversity hotspots. In such cases, DESFA ensures the protection of these areas when interaction is unavoidable.

As of 2024, 8,80% of DESFA's total infrastructure footprint, including both operational and under-construction projects, is situated within areas of designated conservation status on European level (i.e. Natura2000 sites). In more detail, DESFA's footprint is located:

- 6,60% within Special Protection Areas (SPA) of 2009/147/EC (Birds Directive),
- 1,94% within Sites of Community Interest/Special Areas of Conservation (SCI/SAC) of Directive 92/43/EEC (Habitats Directive),
- 0,26% within SPA & SCI/SAC sites.

It is highlighted that these figures include overlapping protected areas. For example, an area may be classified as a Natura2000 SPA and a part of it (or even the entire area) may be classified

as SCI/SAC (protected under Habitats Directive) as well; or vice versa. This means that the actual percentage of DESFA's footprint within protected areas is, effectively, smaller. It is important to note that a significant portion of DESFA's infrastructure was developed prior to the establishment of the Natura 2000 network in Greece. This fact indicates that the presence and operation of DESFA within a specific area does not interfere with its ecological services provided by the abiotic parameters, nor with the biodiversity's interaction with them, nor prohibits presence of species and habitats at risk of extinction in the area, i.e. effectively, **DESFA footprint does not interfere with the features and conservation objectives for which an area is designated as Natura2000.**

Summarizing the above, DESFA's footprint is carefully selected so as to minimize interaction with environmental protected areas and biodiversity hotspots. More importantly, DESFA's presence and operations do not interfere with the conservation objectives and protected features of a Natura2000 site which remain unaffected, underscoring DESFA's commitment to responsible environmental stewardship.

<sup>12</sup> An 8 m wide corridor (4 m on each side of the pipeline axis) where deep-rooted species or buildings are not allowed.

## 4.3 Biodiversity and Ecosystem Impacts

### IMPACTS FROM CONSTRUCTION AND OPERATION ACTIVITIES

GRI 304-2, GRI 413-1, GRI 413-2  
EM-MD-160a.1

DESFA applies a structured approach to land use management across all infrastructure projects, ensuring that operational safety requirements are balanced with environmental protection and community interests.

National legislation regarding development and operation of the NNGS provides for specific land use restrictions to safeguard the integrity of high-pressure pipelines and associated facilities. These restrictions are essential not only for maintaining system reliability and preventing third-party interference but also for minimizing adverse impacts and risks.

The most immediate effects are observed within the construction corridor, where terrestrial flora and fauna are directly impacted. These impacts vary in duration—from temporary, such as nuisance caused by construction activities, to permanent, in areas where operational restrictions remain in place (e.g. no deep-rooted species within the PPS).

Accordingly, the nature and severity of impacts on biodiversity differ between the construction and operational phases, requiring tailored mitigation and management strategies for each stage of the project lifecycle. However, no significant impacts (e.g. degradation of habitats or population dynamics, restriction of ecological services) have been observed during construction and operation of all DESFA's network in Greece, indicating the effectiveness of the company's environmental safeguards and mitigation measures all these years.

### CONSTRUCTION PHASE

During the construction phase, temporary vegetation clearing and land disturbance lead to short-term habitat alterations and changes in land use. These effects are generally localized and, in most cases, reversible through targeted restoration efforts implemented post-construction.

For example, the development of new infrastructure—such as the West Macedonia High-Pressure Pipeline and the planned IGNM—requires temporary work strips of approximately 20–30 meters in width. These areas undergo vegetation clearing and soil disturbance, contributing to the short-term environmental impacts described above.

To mitigate these impacts, DESFA conducts comprehensive EIAs that integrate biodiversity considerations and stakeholder input. These assessments are publicly disclosed in accordance with national legislation, ensuring transparency, accountability, and informed decision-making throughout the project lifecycle.

The EIAs also identify tailor-made mitigation measures to prevent or avoid any adverse impacts and to minimize or compensate for any residual adverse impacts; they additionally describe the monitoring plan throughout a project's lifecycle. On the other hand, EIAs also provide measures to enhance positive impacts on nature (e.g. habitat enhancement works, fire protection belts, biodiversity management works, etc.) and/or people (direct and indirect job opportunities).

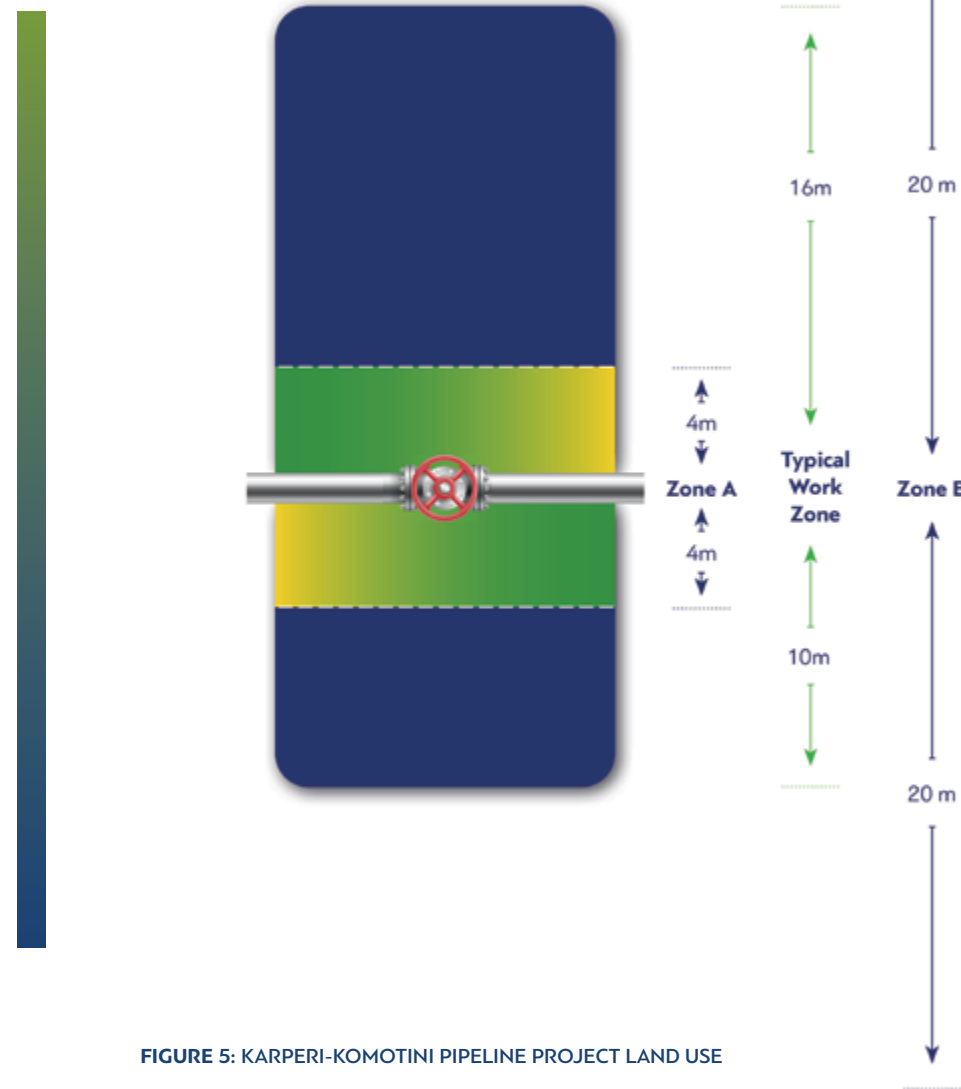


FIGURE 5: KARPERI-KOMOTINI PIPELINE PROJECT LAND USE

## 4.3 Biodiversity and Ecosystem Impacts

### OPERATIONAL PHASE

In contrast to the temporary impacts of the construction phase, the operational phase introduces more enduring changes, particularly in terms of land cover. One of the most notable long-term modifications arises from the maintenance of the PPS, especially in forested areas where revegetation of deep-rooted species is restricted.

Once infrastructure becomes operational, DESFA enforces a permanent PPS of eight meters in width—four meters on each side of the pipeline axis—within which specific land use limitations apply. Vegetation management within this corridor is critical to prevent root intrusion and damage to the pipeline. As such, deep-rooted species are prohibited; nevertheless, development of shallow-rooted plants, including cultivations, vineyards or natural revegetation, are permitted, along with all necessary agricultural activities.

This approach allows for a degree of land continuity: in agricultural zones, shallow-rooted crops can continue to be cultivated, supporting productive land use. In forested areas, however, revegetation is limited to low-rooted species to maintain pipeline safety. These land use measures are further supported by controlled access protocols and regular inspections, ensuring both compliance and operational integrity.

In addition to land use restrictions, infrastructure operations—such as compressor stations and other heavy machinery—introduce environmental pressures mostly through emissions of noise and light. These disturbances could affect especially sensitive and localized (stenoendemic) fauna species and their biodiversity populations dynamics.

### MITIGATION ACTIONS

To mitigate the adverse impacts and risks associated with its operations, DESFA implements a comprehensive suite of environmental and social safeguards.

These include detailed EIAs for all major projects, biodiversity-sensitive route planning, and restoration initiatives aimed at reinstating vegetation and minimizing habitat loss following construction. Additional measures such as noise and dust control protocols during construction and maintenance activities, land restoration, habitats enhancement (through the Green Fund), and continuous engagement with affected stakeholders further reinforce DESFA's commitment to responsible development.

Biodiversity considerations are embedded throughout the entire asset lifecycle through continuous monitoring and adaptive management practices. These efforts align with DESFA's broader environmental stewardship goals, as outlined in its Development Plan 2024–2033 and sustainability policy. By integrating biodiversity into project planning and execution, DESFA not only mitigates environmental impacts and risks but also strengthens its role as a responsible operator contributing to a more sustainable energy future for Greece.

Environmental permitting for all DESFA projects—whether new developments or modifications to existing infrastructure - includes the issuance or renewal of Environmental Terms Approval (ETA). These permits are based on comprehensive Environmental (and Social) Impact Assessments<sup>13</sup>, conducted in accordance with national legislation and European guidelines. All relevant environmental parameters, including biodiversity, land use, and community impacts, are assessed and addressed within these frameworks.

### RESTORATION MEASURES

#### GRI 304-3

Restoration measures include the revegetation of the working strip and compensation for the permanent loss of vegetation within the Pipeline Protection Strip. This compensation is provided through payments to the Green Fund, in accordance with State requirements, for environmental protection purposes.

Following construction, restoration work begins for under-construction projects. The revegetation process is monitored by DESFA for a period of three years, and the relevant study is subject to approval by forest authorities. No partnerships with third parties are involved in the implementation of these measures.

The standards and methodologies applied during restoration are approved by forest authorities through the revegetation study. Prior to this, the Environmental Impact Assessment (EIA)—which outlines the restoration measures, standards, and methodologies—is also reviewed and approved by the competent authorities, including forest authorities, the Ministry of Environment, and NECCA.

### VEGETATION REINSTATEMENT

As part of the mitigation measures shortly described previously, DESFA follows a specific framework for natural vegetation's reinstatement within the entire working strip of any given pipeline project. In order to remediate the vegetation clearance that took place during a project's construction, a dedicated Vegetation Reinstatement Study is prepared and submitted to the competent forest authorities for approval.

Apart from the EIA which provides a general reinstatement framework and to which forest authorities provide opinion during its approval and the Environmental Permitting procedure, the Vegetation Reinstatement Study presents, among others, details regarding standards, methodologies, procedures and most importantly plant species and planting scheme, to be implemented for the revegetation of the working strip. It is important to note that revegetation process is monitored by DESFA for a period of three years.

DESFA acknowledges that some, limited, residual impact on vegetation cover may be induced in forest areas hosting tree species, i.e. permanent loss of vegetation along the PPS. For these areas, compensation is provided through payments to the Green Fund, in accordance with legislative requirements, for environmental protection purposes.

<sup>13</sup> National legislation does not distinguish natural and social environment; hence an EIA records current environmental and social status, assessing impacts on both pillars.



## 4.4 Supplier Environmental Impacts



MATERIAL TOPIC: SUPPLIER ENVIRONMENTAL IMPACTS  
IMPACT: NON-GHG AIR POLLUTION

GRI 3-3, GRI 308-2  
C-S8

DESFA recognizes the importance of managing environmental impacts across its supply chain as part of its broader commitment to sustainability and responsible business practices. While the Company's direct operations are governed by stringent environmental controls, it also acknowledges that upstream construction activities—particularly those undertaken by contractors—can result in significant non-GHG emissions, including VOCs, nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>), and BTX compounds. These emissions, although occurring outside DESFA's operational boundaries, are considered material due to their potential impact on air quality and human health.

To address these concerns, DESFA has progressively strengthened its supplier management framework. Since 2023, the Company has piloted a Vendor Qualification Procedure under the Supply Chain Division, which is finalized and approved, while the tool that will support its operational aspect is currently explored. This procedure, endorsed by the CEO, includes an Environmental Survey designed to evaluate, among others, suppliers' environmental practices in areas such as emissions control, waste management, energy efficiency, and compliance with applicable legislation. The objective is to ensure that suppliers meet DESFA's high standards for ethics, compliance, and environmental stewardship.

In parallel, and specifically within the context of infrastructure project implementation under the ASDEV, DESFA applies additional environmental oversight practices. Contractors responsible for preparing the

Environmental Impact Study (EIS) for each project are evaluated by DESFA, which also monitors implementation through regular inspections to ensure effective environmental management throughout the project lifecycle. In addition, DESFA conducts systematic reviews of contractors' QHSE Management Systems to verify compliance with ISO 9001, ISO 14001, and ISO 45001 standards, as well as all relevant legal requirements.

Further reinforcing its oversight capabilities, DESFA is preparing to launch a Monthly Contractor Environmental Report by the end of 2025. This report will collect structured data on key environmental metrics such as emissions, waste generation and disposal, water usage, energy efficiency and the use of RES. The initiative will establish a robust monitoring framework, enabling DESFA to assess environmental performance across its supply chain, identify risks and promote continuous improvement through best practices.

In 2024, DESFA assessed 14 suppliers for environmental impacts, identifying 13 with potential negative impacts and none with significant actual impacts. For all 13, improvement measures were agreed upon and are being monitored. These actions reflect DESFA's commitment to transparency, environmental risk mitigation, and proactive engagement. Through targeted awareness initiatives and enhanced contractual requirements, the Company continues to build capacity and foster a culture of environmental responsibility among its partners.







## ENGAGEMENT WITH LOCAL COMMUNITIES

GRI 2-25, GRI 413-1

GRI SECTOR STANDARD REF. NO. 11.15.4

Engagement with local communities is a fundamental element of DESFA's project lifecycle, with 100% of operations incorporating structured local engagement activities. Tailored engagement plans are developed for each project to include local authorities, landowners, and vulnerable groups, ensuring inclusive and transparent communication. Public consultations are systematically organized during the EIA process, offering communities meaningful opportunities to express concerns, contribute local knowledge and actively participate in decision-making.

For major new projects, DESFA prepares project-specific SEPs. In 2024, a SEP was developed and implemented for the Karperi-Komotini High-Pressure Pipeline, detailing both mandatory (as defined by national legislation) and voluntary (based on DESFA's corporate responsibility) engagement activities.

In particular, as part of the EIA disclosure process, DESFA actively engaged voluntarily with local communities through three regional meetings. In this context, 114 stakeholders were identified and involved during the EIA preparation phase via official correspondence and targeted meetings held in June 2024 across key cities along the project's footprint. These meetings were attended by a total of 78 participants, illustrating meaningful public dialogue and participation in project development.

In more detail, the following meetings were held:

- June 25, 2024 – Serres, Central Macedonia: The meeting was attended by 30 participants, representing 20 stakeholders.
- June 26, 2024 – Kavala, Eastern Macedonia and Thrace: The meeting was attended by 21 participants, representing 15 stakeholders.

- June 27, 2024 – Komotini, Eastern Macedonia and Thrace: The meeting was attended by 27 participants, representing 16 stakeholders.

In addition to these voluntary consultations, DESFA also participated in a formal public meeting, held within the framework of the statutory consultation process by the Municipality of Emmanouil Pappas. DESFA, responding positively to an invitation from the Municipality of Emmanouil Pappas, presented the project and provided clarifications to more than 30 local residents and stakeholders attending the meeting.

The objective of these consultation activities was to present the project's technical details and timeline, collect baseline data, record concerns, and gather suggestions for mitigation or impacts' enhancement. As a result, DESFA implemented seven special construction techniques and one major route modification in response to stakeholder requests—demonstrating its commitment to responsive and inclusive planning.

During preparatory activities for the IGNM project, DESFA organized four open public meetings focused on compensation procedures. These sessions were attended by 122 individuals, offering clarifications and guidance to affected stakeholders.

To further support stakeholder engagement, DESFA maintains formal project's grievance mechanism that enable individuals and communities to raise concerns related to land use, environmental impacts, or safety measures. These mechanisms are complemented by ongoing monitoring and transparent reporting, reinforcing DESFA's commitment to responsible infrastructure development and open communication.

Indicatively, within 2024, 94%<sup>14</sup> of the grievances raised and submitted, during the construction of the West Macedonia High Pressure Pipeline, were successfully addressed and resolved through targeted remediation actions, demonstrating the effectiveness of DESFA's approach and its responsiveness to stakeholder concerns.

<sup>14</sup> The remaining 6% of grievances that were not resolved in 2024 were successfully addressed during 2025.



A group of men are gathered in a control room, looking at large electrical panels with complex wiring diagrams. The room is filled with technical equipment and monitors. The men are dressed in casual work clothes, including hoodies and jackets. The overall atmosphere is professional and collaborative.

# 05 SOCIETY

---

**5.1 Employment practices and Labor Conditions**

**5.2 Socioeconomic Impact and Energy Access**

**5.3 Local communities**



## 5.1 Employment practices and Labor Conditions



MATERIAL TOPIC: EMPLOYMENT PRACTICES  
RISK: EMPLOYMENT PRACTICES RISK

### GRI 3-3

DESFA recognizes that inadequate employment practices are a material risk with potential implications for employee engagement, talent attraction and retention, succession planning, and overall business continuity.

To mitigate these risks, DESFA has adopted a comprehensive and forward-looking approach to employment, grounded in ethical principles, inclusivity, and continuous development. The Company ensures fair working conditions through robust HR policies, collective labor agreements, and governance mechanisms that promote equal treatment, prohibit discrimination, and safeguard labor rights. These commitments are embedded in DESFA's Code of Ethics and reinforced through structured employee representation and grievance channels.

Recognizing that workforce competence and engagement are critical to operational resilience, DESFA invests in targeted training and development programs aligned with business needs. The establishment of the Technical Training and R&D Center in Thessaloniki exemplifies this strategic focus, serving as a regional hub for vocational training and innovation in energy technologies. Through this initiative, DESFA not only enhances internal capabilities but also contributes to sector-wide knowledge transfer and the energy transition.

Furthermore, health and safety are integral to DESFA's working conditions framework. The Company operates a certified Integrated HSSEQ Management System that ensures a safe and high-performance environment for employees and contractors. Complementary systems for physical security and competence management further reinforce operational integrity. Strategic collaborations with national institutions and community outreach initiatives support a strong safety culture and stakeholder trust.

DESFA's employment practices are further supported by a comprehensive benefits framework, flexible working arrangements, and inclusive policies that promote work-life balance and long-term engagement. These measures reflect the Company's commitment to being a responsible employer and sustaining a resilient, future-ready workforce.



## 5.1 Employment practices and Labor Conditions

### LABOR CONDITIONS

#### GRI 2-23

DESFA is firmly committed to upholding human rights in the workplace. It fosters a culture of fairness and inclusivity, ensuring equal opportunities in recruitment, compensation, and career advancement—regardless of personal characteristics such as age, ethnicity, gender, disability, sexual orientation, religion, political beliefs, or socioeconomic background.

Building on this foundation, DESFA maintains zero tolerance for any form of intimidation, harassment, or discriminatory behavior. All employees are expected to treat one another with dignity, and the company enforces practices that enable diverse teams to collaborate effectively. Diversity is actively promoted, with employees encouraged to bring their unique perspectives and experiences to the workplace. This inclusive approach supports individual growth while enhancing team performance and contributing to the organization's overall success.

To reinforce its commitment to ethical employment, DESFA embeds these principles in its Code of Ethics, HR policies, and collective labor agreements. The company explicitly prohibits exploitative labor practices, including forced or child labor, and champions equal pay and gender equality across its workforce. In support of these commitments, DESFA has established robust governance mechanisms. Dedicated HR functions and employee representation bodies are in place to monitor compliance and address grievances effectively. Regular training on labor rights, ethical conduct, and workplace safety is provided to both employees and contractors, fostering a culture of accountability and respect for human dignity.

Moreover, DESFA guarantees equal access to core benefits for all employees, regardless of employment

status. This inclusive approach strengthens its role as a responsible employer and reinforces its social license to operate.

### EMPLOYEE RELATIONS AND ENGAGEMENT

#### MECHANISMS

#### GRI 402-1

Recognizing the importance of transparent and constructive relationships between management and staff, DESFA promotes open communication based on trust, honesty, and mutual respect. To facilitate this, the company typically provides a minimum notice period of four weeks before implementing significant operational changes. Although not formally defined, consultation practices generally extend to approximately three months, reflecting established business norms.

In addition, DESFA places strong emphasis on timely and transparent communication regarding changes that may affect working conditions. In line with national legislation and collective agreements, the company ensures that employees and their representatives are informed and consulted well in advance of significant organizational developments, such as restructuring, technological upgrades, or project-related workforce adjustments. This proactive approach fosters mutual understanding and helps minimize potential disruptions.

Employee engagement is further supported through formal structures such as works councils and health and safety committees. These platforms facilitate dialogue on employment conditions, occupational health, and workplace improvements, enabling DESFA to maintain constructive labor relations, strengthen employee trust, and uphold its commitment to fair and responsible employment practices.







## EMPLOYEE PERKS AND BENEFITS

### GRI 401-2

DESFA considers its employees a key factor in its success and is committed to fostering a supportive, inclusive, and flexible working environment. To promote work-life balance and adaptability, the Company continues to offer voluntary remote working arrangements where applicable.

In addition to flexible working, DESFA provides a comprehensive package of benefits that go beyond statutory requirements. These offerings are designed to support employee well-being, professional development, and long-term engagement. Aligned with the Company's strategic priorities, the benefits framework addresses the diverse needs of employees across all stages of their careers, ensuring both financial security and personal growth opportunities. DESFA offers a comprehensive range of benefits to its employees in Greece, including:

- Health care services
- Flexible working arrangements
- Private health insurance
- Pension plan
- Monthly food vouchers
- Kindergarten and summer camp allowances
- School transportation allowances
- Christmas and Easter vouchers
- Studies allowance
- Annual health check-up
- Tolls and public transportation cards
- Marriage and childbirth allowances

In line with its commitment to fostering a productive, balanced, and equitable workplace, DESFA designed an employee survey in Q4 2024 to assess engagement and satisfaction across key occupational areas, following the previous iteration conducted in 2022.

The survey yielded an Employee Engagement Index of 67, reflecting a consistently high level of engagement across the organization. Notably, the Company demonstrated improved performance in areas such as "Cybersecurity," "Training," and "Leadership," where targeted initiatives had been implemented over the past two years. Conversely, while the "Supportive Environment" category remained at a high level, it showed a slight decline, prompting DESFA to initiate planning for further actions aimed at enhancing the factors that contribute to a supportive work environment.



## 5.1 Employment practices and Labor Conditions

### EMPLOYEE DEVELOPMENT

#### TECHNICAL TRAINING AND R&D CENTER

In 2024, DESFA inaugurated its Technical Training and Research & Development (R&D) Center in Nea Messimvria, Thessaloniki, marking a strategic investment in the future of the natural gas sector. Drawing on over 30 years of experience and operational excellence, the Company has established the first in-house training facility of its kind in the Balkan region. Strategically located at the epicenter of the Southeastern European gas market, the Center is designed to serve not only DESFA's internal needs but also those of Transmission and Distribution System Operators in Greece and abroad.

The Center serves a dual role safeguards and transfers the specialized skill set of gas industry experts, and contributing to the research and development of new technologies that support the energy transition. It offers continuing vocational services that complement, update, and upgrade the knowledge, skills, and competencies of DESFA's workforce, as well as third-party personnel. This reflects the Company's commitment to building a technically proficient, safety-conscious, and future-ready workforce.

Training at the Center is delivered through an integrated experience that combines theoretical education with practical, hands-on, and on-the-job training. Specialized laboratories, advanced simulators,

and testing platforms replicate real operating conditions, enabling participants to gain expertise in areas such as pipeline integrity management, emergency response, and the integration of emerging technologies. This approach ensures that trainees not only acquire technical proficiency but also internalize a strong safety culture—both essential for maintaining the reliability and resilience of the NNGS.

Beyond its training function, the Center serves as a hub for research and development aligned with DESFA's strategic priorities, including decarbonization, digitalization, and energy transition. Current R&D initiatives focus on hydrogen readiness, biomethane integration, and advanced monitoring systems, in line with the TYDP 2024–2033 and its commitment to a low-carbon energy future. Collaborative projects with academic institutions, technology providers, and industry associations further enhance the Center's role as a driver of innovation within the regional energy ecosystem.

Through the Technical Training and R&D Center, DESFA not only strengthens its internal capabilities but also contributes to the broader development of technical competencies in the energy sector. This initiative underscores the Company's long-term commitment to continuous improvement, knowledge sharing, and the advancement of sustainable energy infrastructure in Greece and beyond.



## TRAINING PROGRAMS

GRI 404-1, GRI 404-2  
C-S5

During 2024, DESFA employees collectively completed 16,426 hours of training, corresponding to an average of 29,0 hours for male employees and 22,24 hours for female employees. This reflects a 19,85% decrease compared to 2023, when total training hours reached 20,494. The reduction is attributed to the alignment of training activities with specific business needs during the reporting year.

Training at DESFA is driven by identified business needs and is applied consistently across the Company. During the reporting period, DESFA delivered targeted training programs covering a wide range of topics, grouped as follows.

### Business skills (Industry-Specialized)

- Employee Experience in Greece
- HEnEx Energy Traders - Gas Ad-hoc Seminar
- Operation and Maintenance of Bearings
- Introduction to the New Global Internal Audit Standards
- Basic Principles of Hydrogen: From Production to Application
- Mastering Advanced Technologies in Energy
- AlInnovation at Work
- Pipeline Manager for the On-line Simulator of the NNGS
- Capital Expenditure Review and Assessment Tools
- EU Electricity Network Codes & the Clean Energy Package
- Bond Loans
- Online Seminar of the Employee Health & Safety Committees
- How to measure & communicate success in corporate affairs
- Specialised Training on the Regulation of Gas Market
- Contracts in the Energy Sector
- Risk Reporting & Monitoring
- Board Members' Liability in a Société Anonyme (S.A.)
- Electronic Transport Documents and Current Developments

in MyDATA (Update)

- Risk Assessment and Preparation of the Annual Inspection Program
- British Institute of International and Comparative Law
- Geopolitics & Energy Workshop
- Basic Training First Aid
- Training for Safety valves maintenance
- "Consulting Support and Knowledge Transfer" Program
- New SCADA HIGH-LEIT System
- Carbon Footprint Assessment EN ISO 14064-1:2018
- Emissions Reduction Plans (PAS 2060, ISO 14068-1:2023, SBTi)

### Soft skills

- Negotiation Training
- Get Things Done
- Active Listening Workshop
- Workshop: Embodying Generational Diversity
- Working Better Together
- Analytical Thinking & Problem Solving
- Workshop on Communication and Public Speaking
- Diversity, Equity and Inclusion in Employer Branding: Beyond the Buzzwords Confirmation
- Playmobil & Peer Coaching Workshop

### Work-related skills

- Work-related Skills
- Excel & Power BI
- Advanced Excel / Data Manipulation
- Business English
- Advanced PowerPoint
- Digital Card
- Database Programmer: Learning SQL and NoSQL Languages
- Power BI for Business Users
- ITIL® Foundation v4 Training & Certification
- ePPM Key Users Training

- Basic Internal Audit Training Program
- Principles of Project Management
- Business Continuity Awareness Training | ISO 22301 In-Scope Processes
- Systems, Applications & Products in Data Processing (SAP) SuccessFactors – User Training
- SAP SuccessFactors – Approvers Training
- Purchase Requisitioner in SAP – New Procurement Procedures & SAP
- Call-Off PO & Change PO Creator in SAP / Contract Manager – New Procurement Procedures & SAP
- Vendor Invoice Management (VIM) Training for PO-Related Invoices
- Training on Purchase Request in SAP S/4HANA – Creating Purchase Requests in SAP S/4HANA
- Training on MRP in SAP – Operating the MRP Program in SAP
- Business Ethics Training
- VIM Training for Non-PO Invoices
- Whistleblowing Management
- Auditing Procurement Management
- Data Protection
- Cybersecurity & Business Continuity Training
- Finance for Non-Financials
- HSSEQ Fundamentals – Safe in the Office
- Health, Safety, Environment (HSE) Emergency Response & Crisis Management
- Environmental and External Affairs
- Safe use of Equipment
- Fire Prevention, Detection, Fighting
- Safe Material Handling
- Occupational Health
- Permit to Work, Lockout Tagout Systems

### Managerial & Supervisory skills

- Strategic Thinking- Strategy
- Performance Management Workshop
- Leadership Workshop

## 5.1 Employment practices and Labor Conditions

Professional Certifications Achieved During the reporting period, DESFA employees obtained the following professional certifications

- COSO Internal Control Certificate
- NEBOSH HSE Introduction to Incident Investigation
- COSO ERM Certificate 2024
- Welding Inspectors / Level II (SNT-TC-1A)
- BCMS ISO 22301:2019 Lead Auditor (Business Continuity Management Systems) Training Course
- NEBOSH National General Certificate in Occupational Health and Safety
- NEBOSH HSE Certificate in Process Safety Management
- ISO 45001:2018 Internal Auditor (Management of Occupational Health & Safety)
- Emissions Reduction Plans Certificate (PAS 2060, ISO 14068-1:2023, SBti)
- Carbon Footprint Assessment ISO 14064-1:2018
- ICA Certificate in Managing Sanctions Risk
- Energy Traders Certification – Gas (ETCG) Ad-hoc Exam
- Visual Inspection / Level II
- Ultrasonic Welding Inspection / Level II
- PECB Certified ISO 37001 Lead Implementer – Greece Lean Six Sigma
- Assignment of Duties: LNG Safety Technician, LNG Port Facility Safety Officer, LNG Deputy Fire Safety Team Leader
- Category A Safety Technicians Training Program

Participation in Various Energy-Related Conferences and Forums

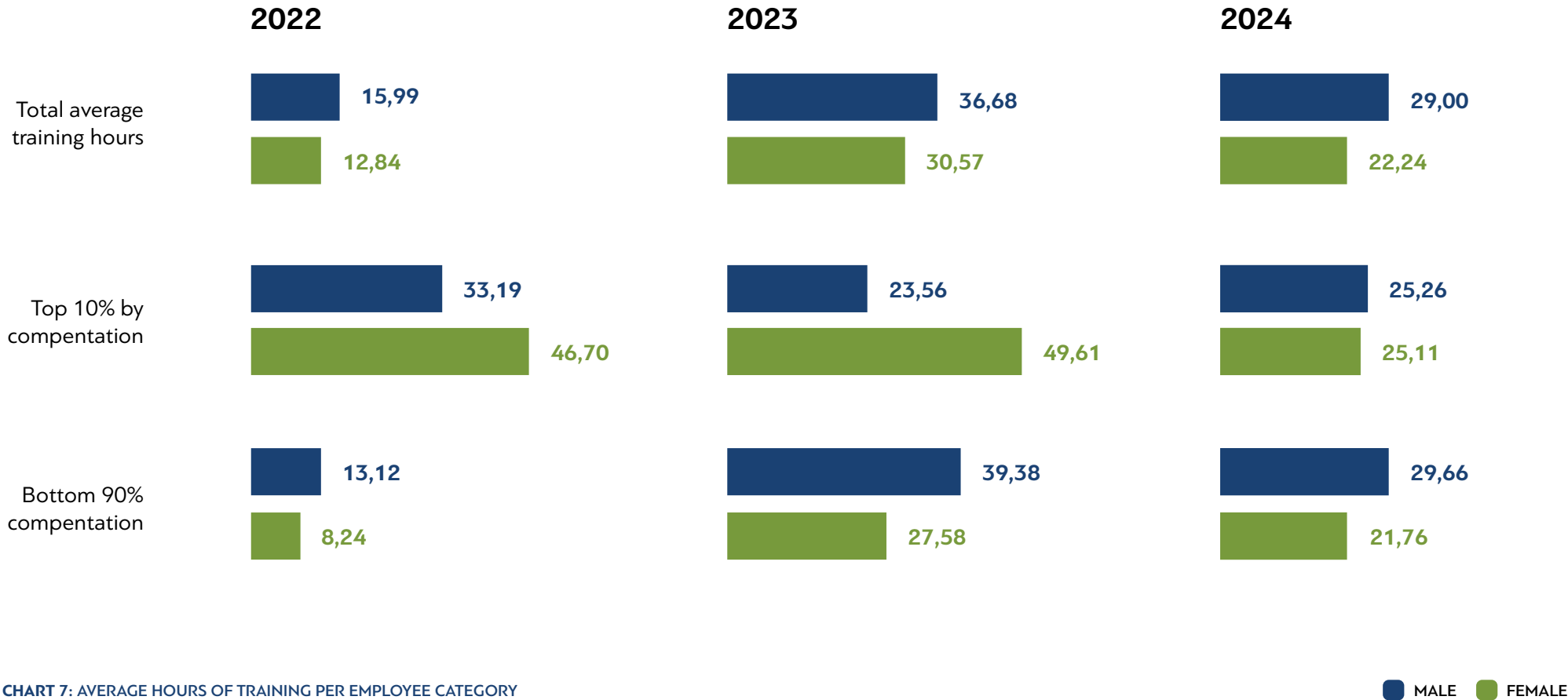
- Xcelerate 2024
- 3<sup>rd</sup> Annual Biofuels Forum
- EGATEC2024 – The 6<sup>th</sup> European Gas Technology Conference
- 11<sup>th</sup> European STAMP Workshop and Conference
- CCUS Conference / Funding CCUS Projects: How to Get Investment Decisions
- CCUS Expedition
- 21<sup>st</sup> GIE Annual Conference 2024
- 2<sup>nd</sup> Energy and Utilities Cybersecurity Forum
- 4<sup>th</sup> Energy Law Forum





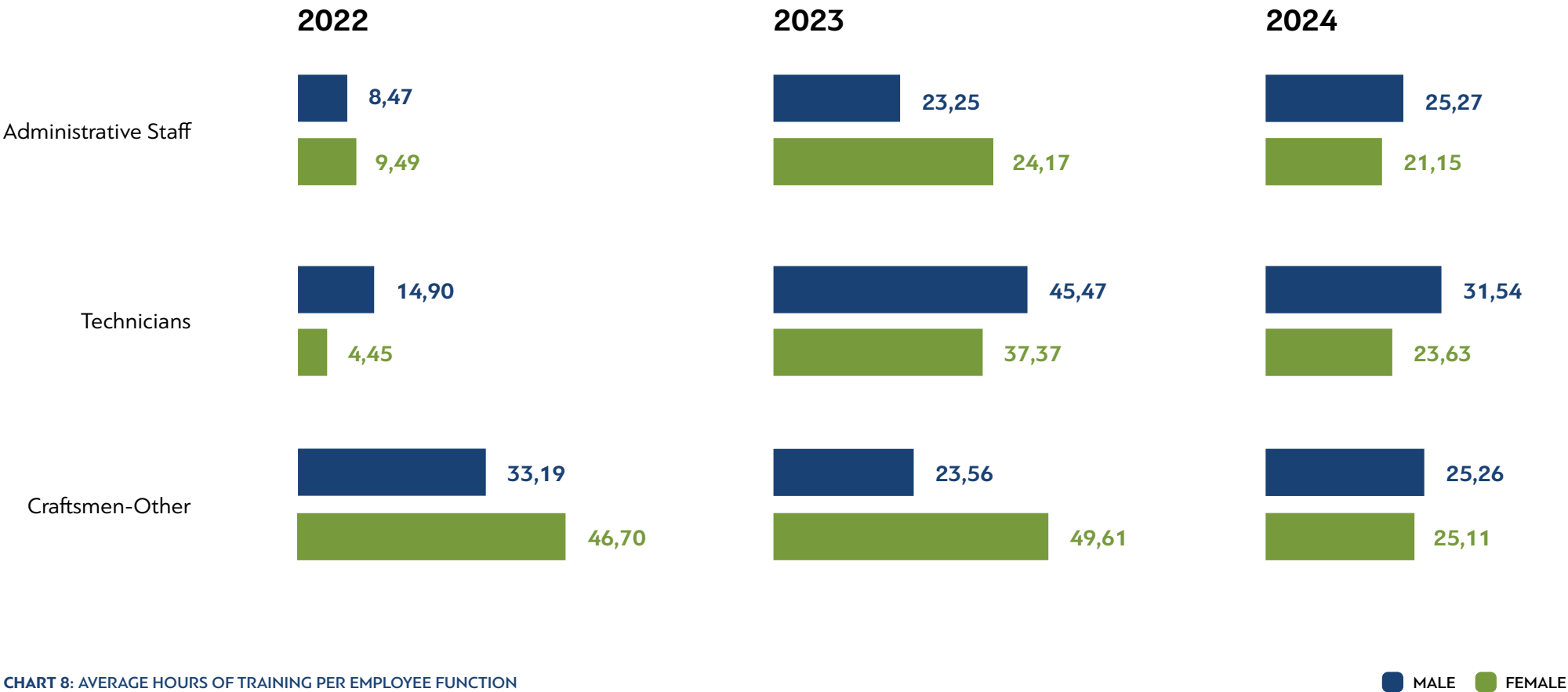
# 5.1 Employment practices and Labor Conditions

GRI 404-1



# 5.1 Employment practices and Labor Conditions

GRI 404-1



## 5.1 Employment practices and Labor Conditions

### OCCUPATIONAL HEALTH AND SAFETY

#### EM-MD-540a.4

DESFA acknowledges that its success is fundamentally tied to the prioritization of Health & Safety, Physical Security, Environment, and Quality (HSSEQ) across all operational levels. The Company's commitment to Zero Accidents and its Net-Zero Masterplan are central values that guide strategic decisions, daily actions, and stakeholder relationships. In alignment with its Code of Conduct and corporate policies, DESFA places human health, safety, public safety, and environmental protection at the core of its sustainable development objectives.

To achieve these goals, DESFA has adopted and continuously improves an Integrated HSSEQ Management System (HSSEQ IMS). This system ensures that employees and contractors operate within a safe, respectful, and high-performance environment, fostering a culture of accountability and continuous improvement. Furthermore, DESFA protects its infrastructure using advanced technologies and stringent protocols. A centralized Physical Security Control Center enables real-time monitoring of critical facilities, ensuring proactive responses to emerging threats and reinforcing stakeholder confidence. Core assets are safeguarded through high-specification CCTV systems, fully compliant with GDPR regulations.

Also, in response to evolving geopolitical challenges, DESFA has developed a tailored threat prioritization framework, combining historical risk assessments with a technology probability matrix. Defensive measures are strategically designed within defined security perimeters, while exclusion criteria are applied to ensure optimal threat response. Moreover, continuous training and competency validation of Physical Security Personnel further enhance the robustness of the security system. Performance is systematically tracked through KPIs, ensuring adaptability and resilience.

In addition, to support its workforce, DESFA has implemented a comprehensive Competence Management System (HSSEQ CMS). Every new employee receives introductory training on HSSEQ topics, followed by role-specific assessments and ongoing monitoring. Targeted actions are taken to address emerging risks and ensure that all staff remain informed and capable of upholding the Company's standards in health, safety, environmental protection, and service quality.





## 5.1 Employment practices and Labor Conditions

### STRATEGIC COLLABORATIONS AND COMMUNITY ENGAGEMENT

Community engagement is integral to DESFA's approach. The Company maintains open communication with local authorities and residents, offering educational outreach to schools and institutions. Regular performance updates in HSSEQ areas are shared, while DESFA's efforts have been recognized in international competitions. Notably, the Company's team in Kuwait was awarded Best Contractor in HSE, DESFA received the HSE Excellence Award from the American Society of Safety Professionals, and DESFA's Environmental team was awarded with the "Environmental Team of the Year" at a national competition.

Furthermore, the Company actively collaborates with leading institutions to strengthen its HSSEQ framework. A memorandum of cooperation (MoC) with the Hellenic Institute of Occupational Health and Safety (EL.IN.Y.A.E.) supports joint programs aimed at enhancing staff vigilance and safety culture. DESFA also participates in Climpect, a national network under the auspices of the National Research Institute of Democritus, contributing to climate change mitigation and policy advisory.

In line with the national Civil Protection framework "Xenokratris", DESFA has established communication lines with relevant authorities and plans joint actions to ensure the protection of people, the environment, and the continuity of its national energy services.

### CARE TO PROTECT

DESFA considers occupational safety and environmental protection as top priorities. Under the "Care to Protect" initiative, the Company has established the Life Saving Rules—a set of 14 principles aligned with international best practices (iOGP)<sup>15</sup>. These rules promote a strong safety culture and environmental awareness across all operations and partnerships, reinforcing DESFA's commitment to safeguarding people and the planet.

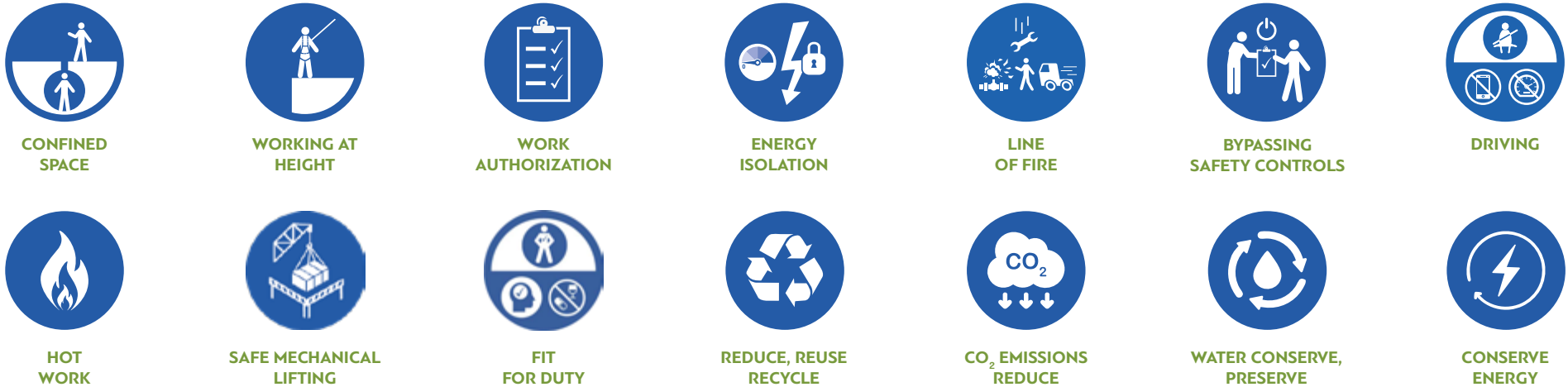


FIGURE 6: LIFE SAVING RULES

<sup>15</sup> For more detailed information on Life Saving Rules and the Care to Protect initiative please click to below links: <https://www.desfa.gr/LifeSaving-Rules> and [https://www.desfa.gr/wp-content/uploads/2024/09/DESFA\\_CARETOPROTECT\\_BOOKLET.pdf](https://www.desfa.gr/wp-content/uploads/2024/09/DESFA_CARETOPROTECT_BOOKLET.pdf)

# 5.1 Employment practices and Labor Conditions

## HUMAN RESOURCES

GRI 2-7, GRI 2-8, GRI 2-30, GRI 401-1, GRI 401-3  
C-S2, C-S3, C-S4, C-S7

In 2024, DESFA's workforce amounted to 617 permanent and full-time employees, with a gender breakdown of 65% men and 35% women, calculated using the headcount method as at 31.12.2024. This represents a 4,05% increase in the workforce compared to 2023, reflecting the evolving operational needs of the Company.

Furthermore, third-party personnel amounted to 884 individuals, the majority of whom—782 employees—were engaged in construction activities, reflecting the operational

focus of DESFA's projects. The remaining third-party personnel included full-time staff in permanent support roles throughout the year, such as security and cleaning personnel, as well as contractors providing services like gardening and disinfection.

The geographical distribution of DESFA's employees continues to span across Greece, with staff located in Spathovouni, Patima, Ampelia, Nea Messimvria, Sidirokastro, Revithoussa, Kipi, Vistonida, Ptolemaida, and Athens. All employee contracts are fully aligned with the legal framework of the Greek state.

As of 2024, 88,98% of employees were covered by the Corporate Collective Agreement, which offers broader provisions than the National Collective Agreement. The remaining employees are subject to individual employment agreements.

DESFA systematically monitors and records its workforce annually by gender (female, male), type of contract (permanent or temporary), and type of employment (full-time, part-time, freelancers) to ensure transparency and alignment with its human capital management practices.

In 2024, women held 34% of managerial positions, continuing a steady upward trend since 2021. This reflects the Company's ongoing commitment to providing equal opportunities based on merit, irrespective of gender or other differentiating factors.

DESFA also monitors hiring and turnover indicators (both voluntary and non-voluntary) across Greece. During the reporting period, the Company hired 51 new employees, while 28 employees departed, 8 voluntarily and 20 due to retirement or other reasons. The new employee hire rate stood at 8,27%, and the overall employee turnover rate was 4,54%.

DESFA fully complies with its parental leave obligations, granting leave in accordance with applicable legal requirements. In 2024, all 18 eligible employees utilized their parental leave. Of these, 10 employees were expected to return to work within the reporting year following the end of their leave, while the remaining 8 are expected to return within 2025.

### DESFA EMPLOYEES



### THIRD - PARTY EMPLOYEES

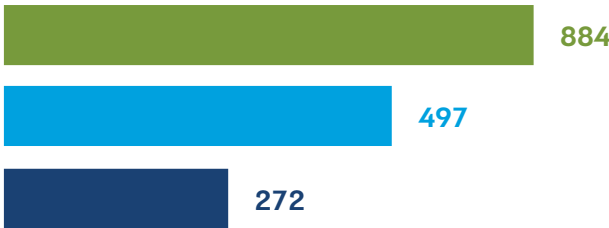
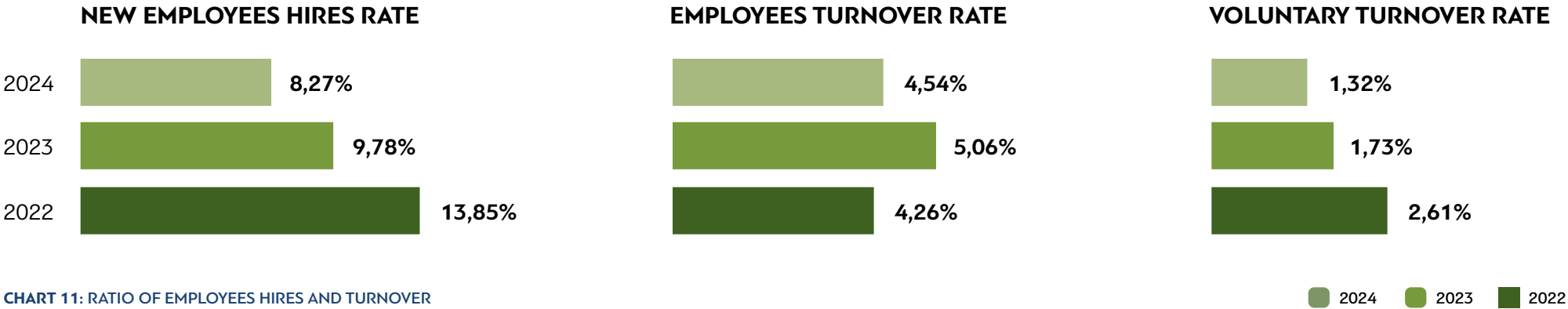
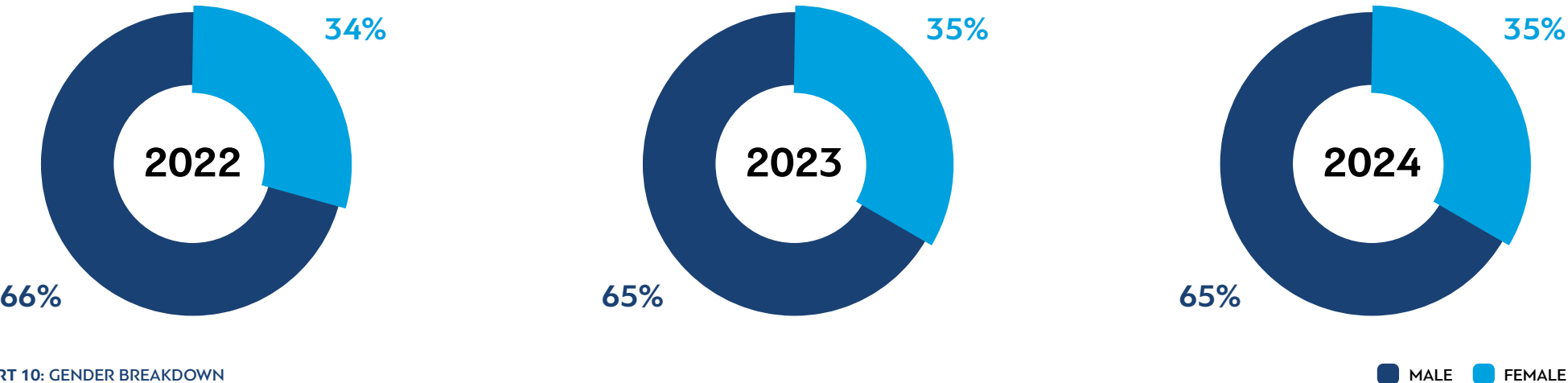


CHART 9: DESFA EMPLOYEES AND THIRD-PARTY PERSONNEL

2024 2023 2022

5.1 Employment practices and Labor Conditions





## 5.2 Socioeconomic Impact and Energy Access



MATERIAL TOPIC: IMPACTS ON LOCAL COMMUNITIES & ENERGY ACCESS

IMPACT: SOCIO-ECONOMIC IMPACT TO LOCAL COMMUNITIES THROUGH EMPLOYMENT AND DEVELOPMENT OPPORTUNITIES

IMPACT: ENERGY SECURITY AND INFRASTRUCTURE

OPPORTUNITY: ENERGY SECURITY AND INFRASTRUCTURE OPPORTUNITY

### GRI 3-3

DESFA approaches socio-economic contribution and energy access through a multifaceted strategy that integrates infrastructure expansion, local economic stimulation, and inclusive energy services. The company's operations are designed not only to meet national energy needs but also to generate lasting value for communities and the broader economy.

To ensure equitable access, DESFA continuously develops and upgrades the NNGS, enabling reliable supply to key sectors such as power generation and industry. Strategic projects—including new pipelines, LNG terminals, and cross-border interconnections—extend energy access to remote areas and reinforce Greece's role in regional energy integration. These efforts support the transition to cleaner fuels and enhance system flexibility, while laying the groundwork for future-ready infrastructure capable of transporting renewable gases and CO<sub>2</sub>.

DESFA's investments also serve as a catalyst for economic development. By engaging local suppliers and contractors, the company channels procurement spending into regional markets,

supporting a wide range of industries from engineering and logistics to hospitality and facility services. This approach strengthens local business ecosystems and contributes to income generation and resilience in the areas where DESFA operates.

Employment creation is another key dimension of DESFA's impact. Infrastructure projects generate jobs throughout their lifecycle, while the company actively promotes local hiring and capacity building. Collaboration with domestic partners fosters knowledge transfer and long-term industrial development. DESFA also encourages inclusive recruitment practices and ensures that residents near operational sites are informed and considered for employment opportunities, with a portion of leadership roles held by individuals from local communities.

Through these integrated actions, DESFA responds to the socioeconomic opportunities and challenges associated with energy infrastructure, reinforcing its commitment to inclusive growth, energy transition, and regional prosperity.



## 5.2 Socioeconomic Impact and Energy Access

### EQUITABLE ACCESS TO INFRASTRUCTURE AND ENERGY SERVICES

GRI 203-1  
EM-MD-000.A

DESFA plays a central role in Greece's energy system, physically connecting energy supply to everyday needs across the country. Through its operations and the value, it distributes—via investments, procurement, and infrastructure, the company contributes significantly to national energy security, economic growth, and the socio-economic development of local communities.

The operation and continuous expansion of the NNGS ensures reliable supply to new areas and key sectors such as power generation, industrial facilities and domestic consumption networks. In 2024 alone, DESFA facilitated the transport of 1.253,47 metric ton-kilometers of natural gas, underscoring the scale and strategic importance of its infrastructure in meeting domestic and regional energy needs.

The TYDP 2024–2033, approved by the RAAEY, outlines approximately €1,37 billion in investments aimed at reinforcing the existing network, expanding access to new regions, and increasing entry and exit capacities. Projects such as the West Macedonia HPP and the IGNM enhance system flexibility and cross-border connectivity, while the Revithoussa LNG Terminal and SSLNG facilities enable supply to off-grid locations.

These investments support the progressive phasing out of coal and other polluting fuels in power generation, industry, and residential sectors, while consolidating Greece's role as a key import gate for natural gas and LNG in Southeastern Europe. DESFA's active participation in the Vertical Corridor initiative, alongside other TSOs from Southern and Eastern Europe, further strengthens regional energy integration by addressing transmission bottlenecks and increasing throughput to the SEE/CEE region.

In 2024, domestic natural gas consumption rose by 30,03%, reaching 66,20 TWh—driven by increased demand from power generation (31,59%) and large industries and CNG stations

directly connected to DESFA's system (74,13%). This growth highlights DESFA's critical role in supporting energy-intensive sectors and stimulating regional economies through job creation, investment attraction, and increased demand for local goods and services.

Looking ahead, DESFA is positioning itself as a key enabler of the energy transition. By developing hydrogen-ready assets and exploring renewable gases such as hydrogen and biomethane—as well as CO<sub>2</sub> transport solutions—the company couples energy security with decarbonization. These initiatives ensure that the constantly expanding natural gas and other future energy systems remain inclusive, resilient, and aligned with national climate objectives, while unlocking new revenue streams and fostering regional development through new technologies and skills.

By combining traditional infrastructure with innovative solutions, DESFA ensures that energy access remains equitable, affordable, and sustainable—reinforcing its role as a catalyst for both energy transition and economic resilience.

### CONTRIBUTION TO NATIONAL AND REGIONAL ECONOMIC DEVELOPMENT

GRI 201-1, GRI 203-2 (a), GRI 204-1

DESFA's operations contribute substantially to the Greek economy, not only through infrastructure development and energy services but also through the value distributed across its supply chain and local communities. A key driver of this impact is the Company's engagement with local suppliers in the regions where infrastructure projects are implemented and facilities operate. By channeling procurement spending into local markets, DESFA supports businesses, their employees, and the families who depend on them—contributing to the vitality and resilience of regional economies.

A key pillar of DESFA's strategy is the continuous effort to strengthen local supplier engagement and enhance the socio-economic footprint of its activities. Supplier-related expenditures stimulate job creation and income generation across a wide range of sectors, including engineering, construction, logistics, and technical services, as well as ancillary industries such as accommodation, catering, cleaning, and security.

By prioritizing local procurement wherever feasible, DESFA sustains employment within its supply chain, fosters long-term partnerships with domestic businesses, and promotes inclusive growth in the communities where it operates. This approach reflects the Company's commitment to maximizing the local benefits of its investments.

In 2024, DESFA's total procurement budget across its significant locations of operation directed to local suppliers amounted to approximately €50.473 thousand, representing 39,49% of total procurement expenses. During the same reporting period, DESFA recorded revenues of €357.016 thousand, with €199.296 thousand distributed as value through operating costs, wages and benefits, capital payments, and community investments.

## 5.2 Socioeconomic Impact and Energy Access

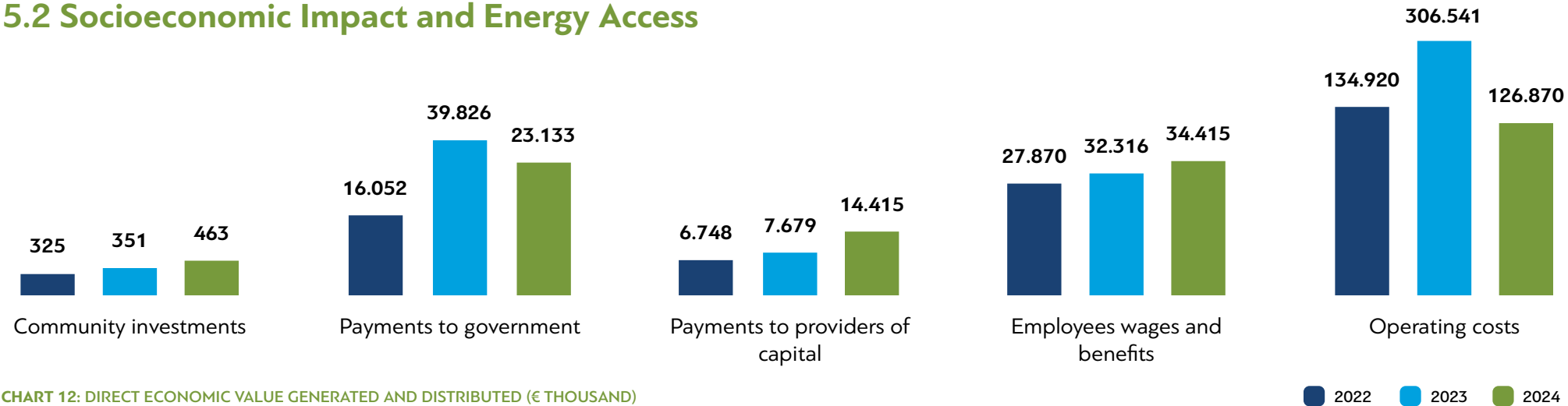


CHART 12: DIRECT ECONOMIC VALUE GENERATED AND DISTRIBUTED (€ THOUSAND)

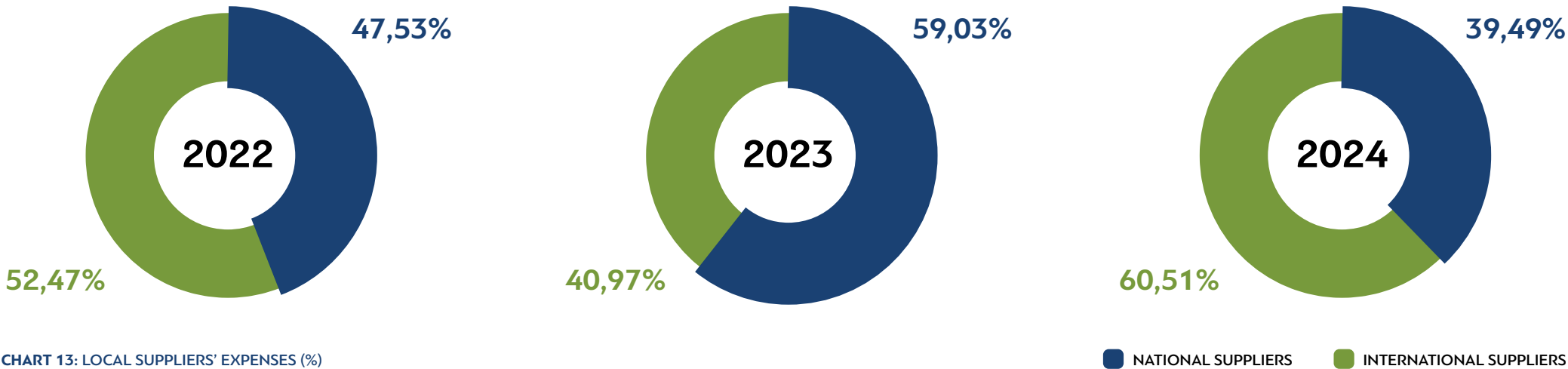


CHART 13: LOCAL SUPPLIERS' EXPENSES (%)



## 5.2 Socioeconomic Impact and Energy Access

### LOCAL EMPLOYMENT GRI 202-2, GRI 203-2 (a)

DESFA's infrastructure development and operational activities generate significant socio-economic benefits for Greece, particularly in the regions where its projects are implemented. The Company's investments in the NNGS and related facilities create direct employment opportunities during both construction and operational phases, while also stimulating indirect and induced jobs across the value chain. These include roles in engineering, construction, maintenance, and specialized technical services, as well as ancillary sectors such as accommodation, catering, cleaning, and security. This multiplier effect strengthens local economies and supports sustainable regional development.

With the aim of creating long-term value for local communities, DESFA prioritizes local hiring and procurement wherever feasible, ensuring that communities benefit from the economic opportunities associated with its projects. During major infrastructure works, the Company collaborates with local contractors and suppliers, promoting knowledge transfer and capacity building within the domestic market. This approach not only enhances project efficiency but also contributes to long-term economic resilience by supporting local businesses and fostering industrial development.

To maximize local benefits, DESFA encourages contractors to apply non-discriminatory hiring practices and to source goods and services from local businesses whenever possible. During operations, the Company ensures that residents from nearby towns and villages are informed of employment opportunities and considered on an equal basis—not only covering temporary employment needs but offering a career path. A notable metric in this direction is that 16% of senior management positions at significant operational sites are held by individuals from local communities.



## 5.3 Local communities

As the operator of the NNGS, DESFA plays a pivotal role in Greece's energy infrastructure and is deeply embedded in the economic and social fabric of the local communities where it operates. The Company's presence across the country brings with it a responsibility not only to ensure energy security and sustainability, but also to contribute meaningfully to the well-being of society.

Guided by a culture that recognizes sustainability as a lever for shared value creation, DESFA integrates social responsibility and the communities' well-being into its priorities. The Company maintains open lines of communication with local communities where it operates, actively listening to their needs and responding with targeted actions that enhance local resilience and quality of life.

DESFA's CSR priorities are rooted in the cultivation of strong relationships with local communities. Through sponsorships, donations, and volunteering, the Company focuses on key areas including environmental protection and biodiversity, social care and inclusion, and the fight against food poverty. Furthermore, volunteering serves a transformative role, empowering employees to share their skills and time in meaningful ways that have a lasting impact on both people and nature.

Through this holistic and responsive approach, DESFA continues to reinforce its role as a responsible corporate citizen—one that builds trust, fosters long-term partnerships, and contributes to the sustainable development of the regions it serves.



## 5.3 Local communities

### STRENGTHENING LOCAL AUTHORITIES AND INITIATIVES

- **Municipality of Alexandroupolis:** To promote biodiversity and sustainable tourism, DESFA offered the design of a study for the opening and marking of hiking trails in the Alexandroupolis region. This initiative supports local economic development while preserving natural habitats, creating opportunities for eco-tourism and community engagement.
- **Support to the Hellenic Fire Service:** DESFA provided personal protective equipment (PPE) and firefighting materials to the Hellenic Fire Service. These resources were distributed to key fire brigades, including those in Alexandroupolis, Sidirokastro, Thessaloniki, and Farsala. This initiative enhances local resilience against wildfires, aligning with DESFA's broader commitment to community safety and environmental protection.
- **Megara Police Department:** DESFA covered the cost of maintenance and repair for 4 official vehicles used by the Security Department.
- **Municipality of Megara:** In response to climate-related risks, DESFA funded essential deforestation services in the Municipality of Megara. The work involved removing flammable materials and dispatching them to composting and energy supply units, reducing wildfire hazards and contributing to circular economy practices.

- **11<sup>th</sup> Rally Greece Offroad:** As part of its local community engagement efforts, DESFA supported the organization of the 11<sup>th</sup> Rally Greece Offroad in Argos Orestiko. Beyond sponsoring the event, DESFA implemented a parallel action focused on environmental preservation by opening and maintaining mountain routes on Mount Vitsi through the ECO Routes initiative.
- **Support the Running Race "Krousovitis Trail" in Serres (Naturist and Mountaineering Association in Sidirokastro (FOSS):** DESFA supported and joined the 5<sup>th</sup> trail running race "Krousovitis Trail" in the Sidirokastro area, Serres Prefecture, for the third consecutive time, reinforcing its long-term commitment to local sports and community well-being.
- **Support for the 7<sup>th</sup> Road Race of the Port of Megara:** The company sponsored the 7<sup>th</sup> Road Race and actively participated through employee volunteers, promoting health, fitness, and community engagement.

### ENVIRONMENTAL PROTECTION

- **Environmental Voluntary Initiatives with We4ll:** DESFA partnered with We4ll to deliver a series of impactful environmental actions. These included six forest and beach clean-ups and four tree-planting events, resulting in the planting of 2,000 trees. The initiative also extended to education and awareness, with five environmental seminars held in five schools and a social accommodation facility,

engaging 95 children, and two webinars on recycling and fast fashion attended by 104 DESFA employees. Volunteer participation amplified the reach and impact of these activities, reinforcing DESFA's commitment to reducing emissions and promoting environmental stewardship.

### SOCIAL CARE AND WELLBEING

- **Municipality of Alexandroupolis:** DESFA supplied two multipurpose 4x4 vans to support emergency situations, as well as one Civil Protection response van. The Company also reconstructed three kindergarten schoolyards and renovated six school courts, creating safer and more engaging spaces for children's education and recreation<sup>16</sup>.
- **Community Center Renovation "Melissa Network":** DESFA renovated part of the Melissa Community Center in central Athens, improving facilities that serve as a hub for social support and inclusion.
- **Association of Cancer Patients of Serres:** The company supplied a climate control system for the association's headquarters, enhancing energy efficiency and comfort for patients and staff.
- **The Hellenic Association of Women with Breast Cancer "Alma Zois":** DESFA supported the Greece Race for the Cure® in Athens, a major awareness event against breast cancer, with 88 employees participating and collectively covering 206 km, combining advocacy with volunteerism.

<sup>16</sup> The donation was carried out in collaboration with Senfluga, DESFA's stakeholders, and Gastrade—a company in which DESFA holds a 20% stake.



## 5.3 Local communities

- **Association for the Protection of People with Disabilities in Megara:** DESFA donated stationery and festive materials for the association's Christmas Bazaar, contributing to fundraising efforts and community spirit during the holiday season.

### FOOD POVERTY

- **NGO "The Love Van":** With the active participation of 400 volunteers, DESFA organized 15 meal distributions for homeless individuals in Athens and Piraeus—an initiative that, for the first time, was also extended to Thessaloniki, Alexandroupolis, and Farsala. To further support the effort, the Company donated a new professional oven.

### CHILDREN AND PEOPLE WITH DISABILITIES

- **Special Olympics Hellas:** DESFA supported the Hellas Special Olympics "Loutraki 2024" by covering part of the accommodation costs for athletes and their escorts, while employees volunteered to assist during the event.
- **Supported Living Shelter "Panagia Evagelistria":** DESFA supplied fuels covering part of transportation needs.
- **Hellenic Children's Village in Fylliro:** DESFA contributed to the well-being of vulnerable groups by covering part of their heating needs, ensuring comfort during winter months.
- **Association for the Protection of Children and Disabled:** The same heating support initiative, as the one carried out in

Fillyro, was implemented, reinforcing the DESFA's commitment to addressing basic community needs.

### EXCELLENCE AND INCLUSION

- **Support for Stelios Malakopoulos (paralympic athlete):** DESFA purchased a set of artificial limbs for an athlete, enabling participation in international competitions and promoting inclusivity in sports.
- **European Youth Parliament of Greece:** DESFA supported the organization of the 46<sup>th</sup> National Selection Conference of the Youth Parliament of Greece, reinforcing its commitment to democratic values, civic engagement, and the empowerment of young people through active participation in institutional processes.

### EDUCATION

- **University of Thessaly:** In response to the severe floods of September 2023, DESFA supplied an electromyograph to strengthen healthcare services in Thessaly, demonstrating its ability to integrate governance with social responsibility during crisis recovery efforts.
- **Eduact:** DESFA funded the necessary equipment for five student teams to participate in the Panhellenic Robotics Championship, promoting STEM education and fostering innovation among young learners as part of its governance

and future-skills agenda.

- **Education Committee of the Municipality of North Kynouria:** The company financed the digitalization and printing of a children's book dedicated to the 2<sup>nd</sup> National Assembly of the Greeks in Astros Kynourias, contributing to cultural preservation and educational outreach in line with its governance and social impact objectives.

### EMERGENCY CRISIS RELIEF

- **Municipality of Alexandroupolis:** The company supplied four containers to house individuals who lost their homes during the August 2023 wildfires in Dadia, providing relief to affected families.
- **Municipality of Mouzaki:** DESFA provided household equipment such as beds and mattresses to residents impacted by the September 2023 floods in Thessaly.
- **Municipality of Palama:** The same initiative, as in Mouzaki, was carried out also in Palamas, helping affected communities to restore basic living conditions.



# 06 GOVERNANCE AND ETHICS

---

6.1 Corporate Governance Structure and Oversight

6.2 Ethics, Integrity and Business Conduct

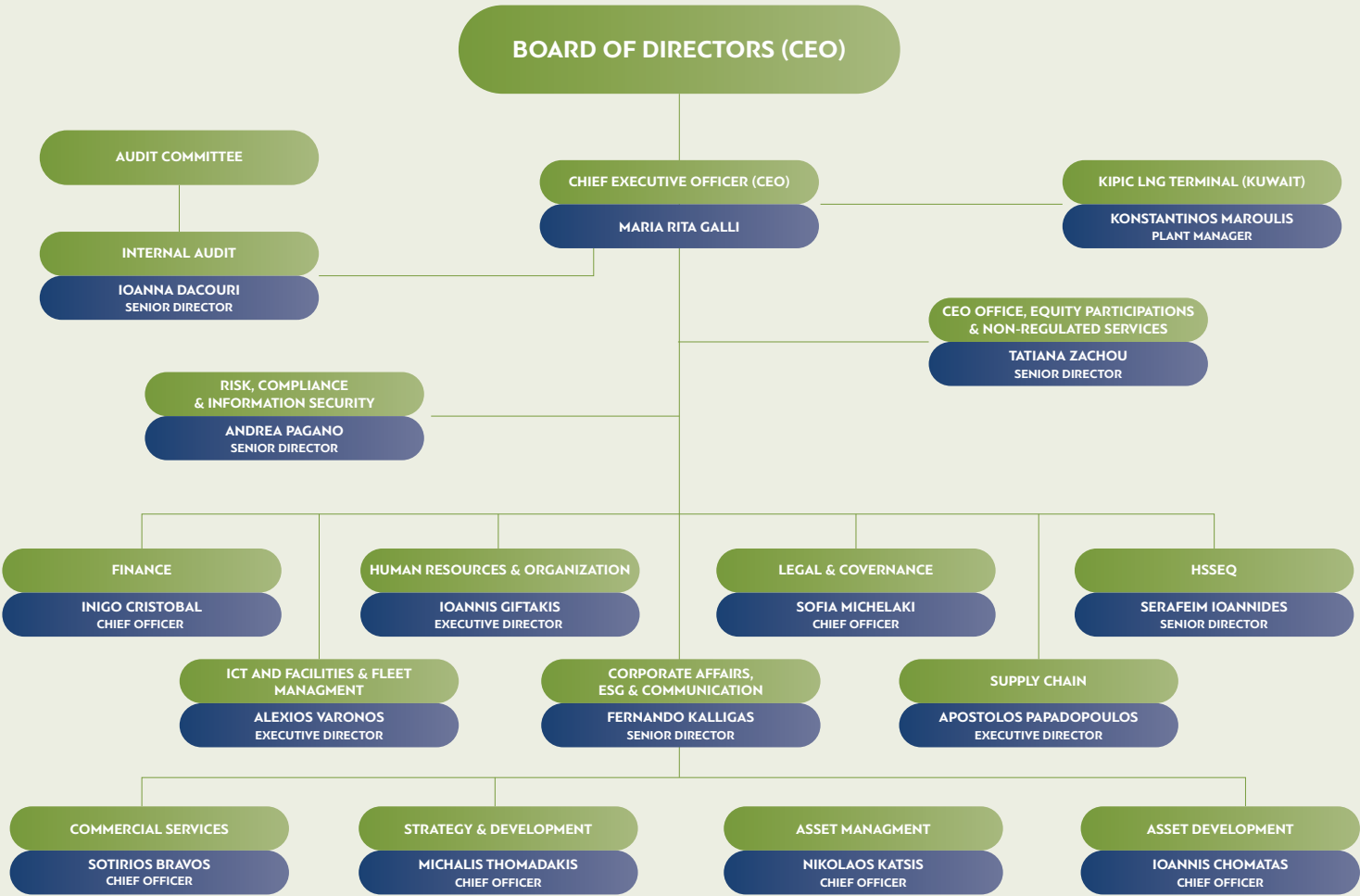
6.3 Responsible Procurement

6.4 Cybersecurity and Data Protection

# 6.1 Corporate Governance Structure and Oversight

The Company's Corporate Governance Code has been developed as a self-regulatory tool designed in alignment with leading Greek and international best practices. Although not legally mandatory, it establishes a robust set of principles that guide the effective functioning of the Board of Directors. This framework ensures continuity and consistency in governance processes, reinforces accountability, and promotes transparency across all decision-making levels. By adhering to these standards, the Company demonstrates its commitment to ethical leadership, sound risk management, and sustainable value creation for all stakeholders.

The following chart illustrates the organizational structure of DESFA:





## 6.1 Corporate Governance Structure and Oversight

### BOARD OF DIRECTORS

GRI 2-9, GRI 2-10, GRI 2-11, GRI 2-17  
C-G1

The Members of the Board of Directors (Board) are appointed in accordance with the provisions of the Company's Articles of Association on the basis of the current allocation of voting rights among Shareholders. In addition, compliance with the requirements of Article 9(d) of Directive 2009/73/EC (Article 60 (1) (d) of the Directive (EU) 2024/1788 as of 4 August 2024) constitutes a prerequisite for the appointment of Board Members at DESFA.

The Board is regularly briefed on sustainability-related matters to ensure informed decision-making on ESG issues. However, it is noted that, at present, ESG competence is not formally included among the selection criteria for Board Members. The Company continues to evaluate opportunities to strengthen governance practices by integrating sustainability expertise into its leadership framework.

The current Board, which was elected by the General Assembly of June 30, 2025, consists of 100% non-executive members (18,20% not appointed by any of the Shareholders as per the provisions of the Articles of Association), with a gender breakdown of 81,80% of male and 18,20% of female, with tenure from June 30, 2025, until June 30, 2028. The Board Members are as follows:

- Paschalis Bouchoris: Chairman of the Board
- Peter Robert R. Verhaeghe: Vice Chairman
- Marta Bellagamba: Member
- Salvatore Branca: Member
- Anna Mantakou: Member
- Panagiotis Tambourlos: Member
- Carlos Ródenas de la Vega: Member
- Theodoros Tsakiris: Member
- Dimitrios Konstantellos: Member
- Simone Nobili: Member
- Sergio Molisani: Member





## BOARD COMMITTEES

### GRI 2-9

The Board Committees have a solely consulting role. All Committee Members hold non-executive positions, and in accordance with the Company's Articles of Association, the Committees are chaired by the two Board Members who are not appointed by any Shareholder. Currently, Mr. Panagiotis Tambourlos serves as Chair of the Audit Committee, while Ms. Anna Mantakou chairs the Nomination and Remuneration Committee. These Committees play a critical role in strengthening governance practices, enhancing transparency, and safeguarding the Company's commitment to accountability and ethical conduct.

### AUDIT COMMITTEE

The Audit Committee at DESFA serves a consulting role and is entrusted with several key responsibilities that uphold the integrity and transparency of the Company's governance framework. The Audit Committee:

- Reviews the financial statements of the Company prior to their approval by the Board of Directors taking into account the views of the external auditor and, if required, takes advice so as to ensure that the principles and policies applied are in accordance with the requirements of the law and the International Financial Reporting Standards (IFRS);
- Consults with the external auditors (and, if such exist, with internal auditors) as to the extent and terms of their assignment;
- Recommends to the Board of Directors the appointment of external auditors and the amount of their fees and monitors all services assigned to the external auditor in order to evaluate the external auditor's independence;
- Receives and makes recommendations at least once a year on the procedures of internal control and risk management set up by the Management of the Company, in order to ensure that the most important risks (including those relating to the compliance with existing laws and regulations) are identified, managed and communicated in accordance with the framework approved by the Board of Directors;
- Reviews and recommends to the Board of Directors the annual internal audit program of the Company; and
- Reviews, discusses and submits its recommendations to the Board of Directors regarding the audit reports drafted by the Company's internal audit services.

The Committee consists of the following members, as presented below:

- Panagiotis Tampourlos, Chairman
- Carlos Ródenas de la Vega, Member
- Simone Nobili, Member
- Dimitrios Konstantellos, Member

## 6.1 Corporate Governance Structure and Oversight

### NOMINATION AND REMUNERATION COMMITTEE

#### GRI 2-10

The Nomination and Remuneration Committee at DESFA serves a consulting role and is entrusted with key responsibilities that support effective governance and strategic human capital management. In particular, the Committee:

- Presents, recommends to the Board of Directors and sets the minimum criteria for the selection of members of the Board of Directors and the senior executive personnel of the Company;
- Recommends to the Board the payroll and benefit policy concerning the members of the Board of Directors and the senior executive personnel of the Company;
- Recommends to the Board on a yearly basis the corporate performance targets for the coming year and recommends a performance bonus of the CEO based on to which extent he achieved the targets for the past year; and
- Recommends to the Board on the yearly overall budget for salary increases and bonuses of the senior executive personnel of the Company.

The Nominations and Remuneration Committee consists of the following members:

- Anna Mantakou, Chairperson
- Theodoros Tsakiris, Member
- Peter Robert R. Verhaeghe, Member
- Marta Bellagamba, Member







## MANAGEMENT TEAM

The Management Team is entrusted with the day-to-day operations and overall operational management of the Company, ensuring the seamless execution of strategic objectives. In addition to overseeing core business activities, the Management Team is responsible for formulating and submitting investment proposals to the Board of Directors, in alignment with the Company's strategic priorities and the provisions of its Articles of Association. This collaborative approach ensures that all investment decisions are consistent with the Company's long-term vision and governance framework, reinforcing sustainable growth and value creation.

- Maria Rita Galli, Chief Executive Officer (CEO)
- Iñigo Cristobal, Chief Financial Officer (CFO)
- Ioannis Gyftakis, Human Resources & Organization Executive Director
- Sophia Michelaki, Chief Legal & Governance Officer
- Nikos Katsis, Chief Asset Management Officer
- Michael Thomadakis, Chief Strategy & Development Officer
- Sotirios Bravos, Chief Commercial Services Officer
- Ioannis Chomatas, Chief Asset Development Officer
- Alex Varonos, ICT and Facilities & Fleet Management Executive Director
- Fernando Kalligas, Corporate Affairs, ESG & Communication Senior Director
- Serafeim Ioannides, HSSEQ Senior Director
- Apostolos Papadopoulos, Supply Chain Executive Director
- Konstantinos Maroulis, Plant Manager, KIPIC LNG Terminal (Kuwait)
- Giovanna Dakouri, Internal Audit Senior Director
- Tatiana Zachou, CEO Office, Equity Participation & Non-regulated services Senior Director
- Andrea Pagano, Risk, Compliance & Information Security Senior Director

## 6.2 Ethics, Integrity and Business Conduct



**MATERIAL TOPIC: BUSINESS CONDUCT & COMPLIANCE**

**RISK: ANTI-CORRUPTION AND BRIBERY COMPLIANCE RISK**

### GRI 3-3

DESFA has identified that failure to implement and enforce a robust compliance framework—including ethics, anti-bribery, and anti-corruption measures—may expose the Company to significant legal, financial, and reputational consequences. Weaknesses in compliance with local and international laws, inadequate employee training, or gaps in ethical business practices can result in violations, fines, loss of stakeholder trust, and exposure to legal actions.

Recognizing the critical nature of this risk, DESFA has taken focused and structured action to mitigate it through a comprehensive compliance strategy. The Company integrates ethical, compliance, and reputational considerations into all business decisions and operations, viewing them as essential pillars of effective management and sustainable growth. Upholding the highest ethical standards is central to maintaining the trust of employees, shareholders, business partners, and the communities in which DESFA operates.

In particular, DESFA has established a robust compliance framework anchored in a suite of policies approved by the Board of Directors. These include the Code of Ethics, the Anti-Corruption Policy, the Whistleblowing Policy, and specific measures addressing bribery compliance which were certified with ISO 37001:2016 Anti-Bribery Management System.

These policies are actively communicated to employees, vendors, and other third parties, ensuring a shared understanding of DESFA's zero-tolerance approach to corruption and unethical conduct. The Company continuously monitors the effectiveness of

these policies and updates them in line with evolving legal and regulatory requirements at both national and international levels.

In addition, DESFA invests in regular employee training on ethics and compliance, fostering a culture of integrity and accountability across all levels of the organization. This proactive approach reduces the likelihood of violations, enhances transparency, and ensures that employees are equipped to identify and respond to potential risks. The Company also promotes adherence to ESG obligations, recognizing that non-compliance could result in legal actions and reputational harm.

In 2024, DESFA intensified its efforts to promote awareness and strengthen its practices in both anti-corruption and data protection, recognizing these areas as critical to ethical conduct and regulatory compliance. As part of this commitment, induction training for new recruits was introduced, complemented by new awareness tools such as awareness material presented in TV monitors in common spaces in DESFA's facilities. These resources were integrated into the annual training program and periodic awareness campaigns, aiming to foster a culture of integrity and vigilance across all levels of the organization.

Furthermore, within the reporting period, DESFA achieved notable milestones in Risk, Compliance and Information Security (RCIS), reflecting its commitment to continuous improvement. These efforts have strengthened the maturity of its governance systems, reinforced internal controls, and aligned operations with best practices in the related areas.







## CODE OF ETHICS

GRI 2-23, GRI 2-24  
C-S6, C-G5

DESFA's Code of Ethics serves as a comprehensive guide that outlines the shared principles and standards of conduct expected from all employees and partners with which DESFA does business. It is designed to safeguard the interests of the Company while promoting responsible and ethical behavior across all levels of operation. By emphasizing integrity, transparency, and accountability, the Code seeks to benefit not only customers and shareholders but also employees and other key stakeholders. Furthermore, it reflects DESFA's unwavering commitment to conducting its business activities in full compliance with the applicable European and Greek regulatory frameworks.

The Code of Ethics covers the following areas:

- Human rights
- Health and Safety
- Environmental protection
- Alcohol & drug abuse and smoking ban
- Protection of information & communication
- Prohibition of donations to political parties
- Conflict of interest
- Bribery and corruption
- Sponsorship and donations
- Relations with stakeholders

DESFA is committed to maintaining and continuously strengthening a robust governance system that aligns with applicable legislation, international best practices, and the Company's internal policies. The Board and the Management Team serve a central role in setting the tone at the top, fostering a corporate culture rooted in integrity, transparency, professionalism, and a commitment to continuous improvement. This governance framework is essential for effectively addressing the challenges associated with sustainable development.

Within this framework, the Ethics Committee provides guidance on updates or amendments to the Code of Ethics, has the authority to request audits by the Internal Audit function to assess the effectiveness of the Code and is responsible for reviewing and deciding on reports submitted under the Whistleblowing Policy. This ensures that ethical standards are upheld and that concerns are addressed in a structured and transparent manner.

The Code of Ethics is available on website: <https://www.desfa.gr>



## 6.2 Ethics, Integrity and Business Conduct

### ANTI-CORRUPTION AND TRANSPARENCY GRI 2-23

DESFA remains firmly committed to promoting ethical principles across all areas of its operations. This commitment is reflected in the implementation of robust measures aimed at preventing any form of corrupt behavior in its interactions with both public and private entities. These measures extend to various operational domains, including supply chain management, licensing, negotiations, financial processes, recruitment, sponsorship and donation activities etc. In doing so, DESFA ensures strict adherence to anti-corruption legislation, encompassing both national laws and international conventions ratified by Greek law, as well as globally recognized standards.

### ANTI-CORRUPTION POLICY GRI 2-24, GRI 205-2, GRI 205-3 GRI SECTOR STANDARD REF. NO. 11.20.5

The Anti-Corruption Policy is a core element of DESFA's Internal Control and Risk Management System, reinforcing the Company's commitment to ethical conduct and regulatory compliance. By embedding anti-corruption principles into its operational framework, DESFA ensures that these measures are systematically applied and aligned with its broader governance and risk mitigation strategies.

The Policy provides a clear and structured distinction between acceptable and prohibited conduct in operationally sensitive areas. These include interactions with public authorities, procurement procedures, business partnerships, entertainment-related expenses, the exchange of gifts, personnel selection, and financial processes. This clarity helps safeguard transparency and accountability across all business functions.

Moreover, the Policy and the annexed Anticorruption Model, identifies key risk areas and sets out both preventive and corrective actions to effectively address potential corruption.

It also defines the roles and responsibilities of individuals and departments, while establishing guiding principles that align with DESFA's overall corporate governance framework.

In this context, the Policy is designed not only to raise awareness but also to enable continuous monitoring and encourage the active engagement of employees in preventing, identifying, and reporting potential violations of anti-corruption regulations. Through this approach, DESFA fosters a culture of integrity and vigilance throughout the organization.

In 2024, DESFA undertook several initiatives to further strengthen its anti-corruption framework. These included the update of the Anti-Corruption Risk Assessment, in which each Division of the Company re-evaluated the corruption risk levels for the sensitive activities mapped to them under the Anti-Corruption Model, to reflect evolving operational realities and emerging risks.

Additionally, continuous monitoring mechanisms were enhanced through the introduction of key performance indicators, which were defined for the first time within the framework of ISO 37001:2016, to measure performance in critical areas. Furthermore, structured internal reviews were conducted and shared digital spaces were created between the Business Ethics and Compliance Department and each Division, allowing the exchange of all necessary documentation in the context of implementing the requirements of ISO 37001:2016, with which DESFA had been certified the previous year.

Throughout the reporting period, DESFA recorded no confirmed incidents of corruption. There were no disciplinary actions or dismissals of employees due to corruption-related violations, and no cases in which contracts with business partners were terminated or not renewed on corruption grounds. Furthermore, no public legal proceedings related to corruption were initiated against the Company or its employees, and there were no outcomes from such proceedings to report.

During the reporting period, DESFA communicated its Anti-

corruption Policy and procedures to all Board Members and the Management Team, who also received relevant training.

Also, training on the Code of Ethics, Anti-Corruption Policy, and Whistleblowing Policy was offered to all personnel through the annual HR curriculum. As a result, 66% of employees, including both technical and administrative staff, were trained and informed on anti-corruption practices.

Within this group, Key Personnel—whose roles may involve exposure to corruption-related risks—achieved an 82% attendance rate. For this critical category, three dedicated sessions were scheduled (plus one for Directors), and personal invitations indicated mandatory participation. The remaining 18% of Key Personnel are scheduled for follow-up training in Q2 2025.

Finally, the Company ensured that all business-to-business customers and suppliers were made aware of the Anti-Corruption Policy.

### PUBLIC INSTITUTIONS AND PAYMENTS GRI 415-1

DESFA actively promotes continuous and transparent dialogue with public institutions and regulatory bodies, guided by the principles of integrity, proper conduct, and fair cooperation, while fully respecting the applicable legal and regulatory frameworks. In line with its commitment to ethical business practices, the Company strictly prohibits any form of unofficial payment to public administration entities, private organizations, public officials or intermediaries intended to accelerate, influence, or facilitate business activities.

Furthermore, DESFA maintains a firm stance against political involvement through financial contributions. No corporate donations, whether direct or indirect, are permitted to political parties, movements, committees, or other political organizations, including their representatives and candidates. This prohibition applies universally, including activities conducted abroad or associated with foreign political entities, thereby reinforcing

## 6.2 Ethics, Integrity and Business Conduct

the Company's dedication to neutrality, transparency, and compliance.

In addition, DESFA ensures full transparency regarding any financial assistance received from government sources, consistent with the applicable regulatory framework. Any such support, including grants, tax incentives, or subsidies, is properly documented, reported, and utilized solely in alignment with the Company's operational and strategic objectives. The Company does not allow government support to influence its governance, decision-making, or commercial activities, thereby safeguarding independence and ethical integrity.

### FINANCIAL ASSISTANCE RECEIVED FROM THE GOVERNMENT GRI 201-4

DESFA recognizes its significant role in the Greek economy and remains fully committed to meeting its obligations to the Hellenic State. This includes the timely and accurate payment of taxes and insurance contributions, as well as the maintenance of transparent, cooperative, and constructive relationships with all relevant public institutions. In this way, the Company contributes not only to the national fiscal system but also to the wider stability and development of the Greek economy.

In addition, DESFA actively participates in co-funded investment frameworks, receiving grants under the European Union's operational programs to support the development and modernization of critical energy infrastructure. Over the past decade, the Company has successfully secured more than € 100 million in EU co-funding, reflecting the strong credibility of its project management approach and its capacity to deliver large-scale energy investments of strategic importance for Greece and the wider region.

In 2024, DESFA received €9,38 million in grants, reinforcing its capacity to advance strategic projects and innovation. Additional funding is anticipated in 2025, including grants under the Connecting Europe Facility (CEF) for studies related to the H2DRIA project.

The Company's project management systems and practices have been fully recognized and accepted by the competent national authorities responsible for the co-funding programs. Furthermore, DESFA has been certified by an independent external auditor with the Management Adequacy certification, which confirms the effective and efficient management of co-financed projects in line with Greek legislation. This certification is subject to regular reviews and renewals, ensuring ongoing compliance with the highest standards of accountability and governance.

### REMUNERATION POLICIES AND PROCESS GRI 2-19, GRI 2-20

The remuneration of the Board members is subject to annual approval by the General Assembly of Shareholders. This process is initiated through a proposal submitted by the Board, which is based on the recommendation of the Nomination & Remuneration Committee. The approach ensures transparency, accountability, and alignment with corporate governance principles, while also reflecting market standards and the responsibilities entrusted to Board members.

The Nomination and Remuneration Committee is responsible for recommending to the Board of Directors the overall remuneration and benefits policy applicable to both Board members and the Company's senior executives. This includes ensuring that the proposed framework aligns with the Company's strategic objectives, regulatory requirements, and best governance practices. In instances where additional expertise or market benchmarking is deemed necessary, the Committee may seek external advisory support or commission relevant analyses to ensure informed and objective decision-making.

The current remuneration and benefits policy for Senior Executives comprises both fixed and variable components, designed in alignment with leading national and European Union standards and market benchmarks. This policy has been formally approved by the Board, following the recommendation of the Nomination and Remuneration Committee. Each year, the Committee proposes corporate performance targets to the

Board, ensuring that these objectives are consistent with the Company's overall business strategy and its long-term sustainability goals. This approach aims to foster responsible governance, promote value creation, and maintain competitiveness within the industry.

The variable component of remuneration for Senior Executives is directly linked to the degree of achievement of both corporate and individual performance targets. These corporate targets are carefully aligned with the Company's strategic priorities and overall business objectives, and they explicitly incorporate specific ESG criteria. This structure ensures that executive incentives not only drive financial performance but also promote sustainable growth and responsible corporate practices.

### COMPLIANCE WITH LAWS AND REGULATIONS. GRI 2-27, GRI 206-1 A-G2, SS-S4

At DESFA, Compliance plays a vital role in supporting the effectiveness of the Internal Control System. It is responsible for monitoring and assisting designated functions, facilitating open communication, and delivering targeted training to ensure that all employees understand and follow the Company's internal policies, procedures, and applicable legal and regulatory requirements.

DESFA firmly believes that ethical business conduct is foundational to sustainable growth and integrates reputational and ethical considerations into everyday operations and strategic choices. This reflects the Company's ongoing commitment to responsible corporate governance.

In 2024, DESFA incurred a monetary loss due to legal proceedings related to a labor law issue, details in respect of which cannot be further disclosed for confidentiality reasons. Further, no monetary losses were recorded from business ethics violations such as anti-trust activities, fraud, insider trading, anti-competitive behaviour, market manipulation, malpractice, corruption, or bribery.

## 6.2 Ethics, Integrity and Business Conduct

### CONFLICT OF INTERESTS

#### GRI 2-15

DESFA acknowledges and respects the right of its employees and business partners to engage in investments, business ventures, and other activities, provided these are legally permissible and do not conflict with their engagements with the Company. In this context, employees and business partners are expected to promptly disclose any situations that may arise which prevent them from making decisions in DESFA's best interest, so that they are assessed by the Company.

This expectation is firmly rooted in the principles outlined in DESFA's Code of Ethics and Anti-Corruption Policy, which emphasize transparency, integrity, and accountability in all professional conduct.

### WHISTLEBLOWING POLICY

#### GRI 2-25

#### SS-S9, SS-G1

A fundamental pillar in promoting a corporate culture of integrity and accountability at DESFA is the implementation of a comprehensive Whistleblowing Policy, which is publicly accessible through the Company's official website. This Policy provides a clear and structured framework for the receipt, assessment, and management of reports submitted by employees, contractors, or other external stakeholders, whether identified or anonymous.

The Policy incorporates robust mechanisms to safeguard the integrity of investigations, ensure strict confidentiality, and protect whistleblowers from any form of retaliation, thereby fostering a secure and trustworthy reporting environment.

In accordance with the Company's Code of Ethics, Anti-Corruption Policy, and other internal procedures, DESFA's Whistleblowing Policy addresses actions or omissions that constitute violations of these frameworks, breaches of the Internal Control and Risk Management System, or instances of seriously improper conduct, including criminal offenses occurring in the course of professional duties.

By implementing and actively maintaining this Policy, DESFA demonstrates its ongoing commitment to fostering a culture of transparency, ethical conduct, and responsible corporate governance, while ensuring that all reports are appropriately managed and addressed.

Within the reporting period, all Board members, employees and business partners were notified and informed about the Whistleblowing Policy of the Company. In addition, training sessions on the Whistleblowing Policy were conducted reaching over 66% of the employees.

### COMMUNICATION CHANNELS

#### GRI 2-16, GRI 2-26

DESFA actively encourages its employees to utilize the established internal reporting channels to ensure that whistleblowing reports are addressed effectively, diligently, and within a reasonable timeframe, in line with the requirements of the European and the Greek legal framework, as applicable. To facilitate this process, the Company has implemented multiple easily accessible reporting mechanisms, designed to provide flexibility and confidentiality for all stakeholders.

DESFA's accessible reporting channels:

- Electronically via e-mail to a specific address.
- Verbally via a telephone hotline.

In accordance with the Policy, any report received through the whistleblowing channels initiates an investigation process to be conducted by Internal Audit, while the final decision rests with the Company's Ethics Committee, with ongoing reporting to the Audit Committee.

During the reporting period, DESFA received three reports. The main issues reported concerned alleged behavior contrary to the Code of Ethics. The reports were processed by the Internal Audit Division and, upon the decision of the competent Ethics Committee, were under assessment.





## 6.3 Responsible Procurement



MATERIAL TOPIC: RESPONSIBLE PROCUREMENT  
RISK: SUPPLIER GOVERNANCE AND OVERSIGHT RISK

GRI 3-3  
GRI 407-1, GRI 414-2  
C-S8

DESFA recognizes that responsible procurement is a critical component of sustainable business operations and effective risk management. The Company acknowledges that the absence of a formalized and transparent framework for the selection and oversight of suppliers and external partners may lead to substandard service delivery, operational inefficiencies, legal disputes, and reputational damage. Furthermore, the lack of contract performance monitoring mechanisms may result in unethical practices or non-compliance with internal standards and external expectations—collectively referred to as Supplier Governance and Oversight Risk.

To mitigate these risks, DESFA has adopted a structured and proactive approach to supplier governance, embedding compliance, ethical standards, and performance monitoring into its procurement and contract management processes. All general contract terms require vendors to comply with a comprehensive set of obligations, including adherence to labor laws and employment practices related to occupational health and safety, welfare, the prohibition of child and forced labor, and immigration regulations. Vendors are also required to accept DESFA's Code of Ethics, with analogous provisions extended to subcontractors, ensuring accountability throughout the supply chain.

In 2024, DESFA advanced the development of its Vendor Qualification Procedure, conducting a pilot project to test the process with selected vendors. Once fully implemented, this procedure will enable DESFA to better screen its value chain and ensure that both existing and potential vendors meet the Company's high standards. The pilot process, managed by the Supply Chain Division, includes environmental screening and integrates sustainability criteria into vendor evaluation.

As part of its onboarding process, DESFA communicates its Code of Ethics, Anti-Corruption Policy, and Whistleblowing Policy to vendors, requiring formal acceptance as part of contractual terms.

The Company also applies due diligence procedures and Know Your Counterparty (KYC) tools to support vendor selection and engagement. During project execution, DESFA conducts timely reviews of contractors' QHSE (Quality, Health, Safety, and Environment) management systems to ensure compliance with international standards (ISO 9001, ISO 14001, ISO 45001) and relevant legislation. Key performance indicators for 2024 reflect the effectiveness of these measures:

- 92% of agreements managed by the Supply Chain Division included clauses confirming vendor acceptance of DESFA's Code of Ethics.
- 92% of vendors formally accepted and committed to DESFA's anti-corruption policies.
- 100% of contractors demonstrated alignment with QHSE Management System Standards.

Additionally, contract performance monitoring is embedded in DESFA's governance framework. Contract Managers are responsible for providing structured feedback on vendor performance, enabling early identification of issues and continuous improvement.

Notably, in 2024, no incidents were reported by Contract Managers, indicating effective oversight and adherence to contractual obligations. Furthermore, no operations or suppliers were identified where workers' rights to exercise freedom of association or collective bargaining were violated or at significant risk. The Company reported zero cases of significant actual or potential negative social impacts in 42 screened vendors, as also no such impacts were identified within the broader supply chain. As a result, no suppliers were flagged for improvement actions or relationship adjustments following social impact assessments. These outcomes reflect DESFA's commitment to responsible procurement, ethical business conduct, and the continuous monitoring of supplier practices to ensure alignment with its ESG standards and corporate values.

Through these initiatives, DESFA reinforces its commitment to responsible procurement, mitigates supplier-related risks, and ensures the delivery of high-quality, ethical, and compliant services aligned with its strategic and sustainability objectives.

## 6.4 Cybersecurity and Data Protection



**MATERIAL TOPIC: CYBERSECURITY AND DATA PROTECTION**

**RISK: CYBERSECURITY & SYSTEM INTEGRITY RISK**

**OPPORTUNITY: CYBERSECURITY & SYSTEM INTEGRITY**

### GRI 3-3

In line with its broader digital transformation strategy, DESFA applies advanced systems that enhance operational efficiency, reliability, and risk mitigation. These include real-time control and monitoring tools, strategic planning platforms such as the Health and Safety system on SpheraCloud, and the newly introduced Human Resources Management System.

The integration of balancing and linepack management systems further supports system performance. These technological advancements are not only instrumental in streamlining operations but also prompt DESFA to undertake more dedicated actions to ensure systems integrity and cybersecurity in an increasingly digitalized enterprise landscape.

Under this framework, the Company acknowledges that failure to safeguard the confidentiality, integrity, and availability of commercial, technical, personal, and operational data—whether due to cyber threats, non-compliance with data protection regulations such as GDPR, system failures, or inadequate IT controls—can lead to significant legal penalties, reputational damage, and operational disruptions. Furthermore, the inability to ensure the completeness, accuracy, accessibility, and timely recovery of critical data and IT systems may compromise business continuity, hinder informed decision-making, and erode stakeholder trust.

These risks pose a direct threat to DESFA's regulatory compliance, digital resilience, and long-term performance. Conversely, ensuring robust cybersecurity and data protection presents a strategic opportunity to enhance operational efficiency and reduce exposure to costly disruptions.

By proactively reinforcing system reliability and aligning with data protection regulations, DESFA mitigates financial and legal risks, supports accurate decision-making, and safeguards business continuity. This approach contributes to leaner, more resilient operations and reflects DESFA's ongoing commitment to sustainable growth and responsible governance.



## 6.4 Cybersecurity and Data Protection

### CYBERSECURITY

To further reinforce its cybersecurity posture, DESFA has implemented a comprehensive set of initiatives aimed at safeguarding its infrastructure and digital assets. These efforts are part of a broader strategy to ensure system integrity and resilience in a rapidly evolving threat landscape.

Key components of this framework include the segregation of Operational Technology (OT) and Information Technology (IT) networks, which enhances system security and minimizes cross-domain vulnerabilities, as well as the adoption of a secured hybrid cloud architecture that enables scalable and protected data operations.

In 2024, DESFA advanced its cybersecurity strategy by integrating proactive defense mechanisms and aligning practices with international standards. The development of centralized data repositories and reporting frameworks ensures secure and efficient access to critical information, supporting both operational continuity and informed decision-making.

Actions such as OT/IT segregation, advanced cloud architecture, proactive defense, control and monitoring systems, strategic planning and optimization tools, centralized data management, and balancing and linepack systems collectively form the foundation of DESFA's cybersecurity framework. These measures reflect the Company's commitment to protecting sensitive data, maintaining system integrity, and fostering stakeholder trust in an increasingly digitalized enterprise environment.

In particular, a key focus has been the enhancement of cybersecurity protocols across all critical systems. DESFA has implemented robust monitoring mechanisms, intrusion detection systems, and access control policies to prevent unauthorized access and mitigate cyber threats. The Company also invested in employee awareness and training programs to strengthen its internal defense against phishing, social engineering, and other cyber risks.

In 2024, DESFA achieved several key milestones in strengthening its cybersecurity and digital governance framework. The Company successfully established comprehensive cybersecurity governance and risk

management structures, culminating in the certification of ISO 27001 and ISO 22301, which reflect its commitment to international standards in information security and business continuity. Capitalizing on the initial successful certifications, in 2025 DESFA managed to maintain the certifications and to achieve the expansion of the certification to more key functions of the Company.

Building on this foundation, DESFA completed the deployment of an advanced network security monitoring system (Fortinet SIEM), enabling real-time analysis of security alerts generated by applications and network hardware. To further enhance resilience, the Company conducted thorough supply chain and vendor risk assessments, ensuring third-party compliance with cybersecurity protocols. In parallel, DESFA implemented a robust Threat Intelligence solution alongside endpoint monitoring and response systems, reinforcing its ability to detect and respond to emerging threats.

The Company also strengthened account management and access control mechanisms, adopting advanced user authentication methodologies such as Multi-Factor Authentication (MFA) and Privileged Access Management (PAM). Finally, the launch of the OT-IT Convergence project marked a significant step toward integrated digital governance and improved interoperability across operational and enterprise systems. Together, these initiatives demonstrate DESFA's proactive approach to safeguarding its digital assets and ensuring the integrity, confidentiality, and availability of its critical infrastructure.

### DATA PROTECTION

GRI 418-1

C-G6, SS-S5

The Company ensures that personal data is processed lawfully, fairly, and transparently, collecting and retaining only what is necessary for specific, explicit, and legitimate purposes. Strict measures are in place to prevent the retention of personal data beyond its intended use, in full compliance with applicable data protection regulations. DESFA's established Data Protection Policy aligns with Regulation (EU) 2016/679 (GDPR), its transposition into Greek law (L. 4624/2019), and relevant guidelines and best practices.

This policy is supported by a suite of procedures and tools, including the Data Protection Impact Assessment Procedure, Data Subject Request Management Procedure, Consent Management Procedure, Data Breach Management Procedure, Data Minimization and Data Deletion Procedures and Operating Instructions for Data Protection by Design and by Default.

In 2024 the Data Protection Office conducted targeted audits in high-risk Divisions to assess compliance with the GDPR and DESFA's internal personal data protection procedures and identify areas for improvement. A significant advancement that has been completed during the year was the migration of Records of Processing Activities (RoPA) to the secure OneTrust platform, which enhanced accessibility, control, and traceability while also facilitated the process of updating records. DESFA also applied Privacy by Design principles across several business operations, embedding data protection considerations from the earliest stages of process and system development.

In parallel, DESFA has strengthened its data governance framework to ensure compliance with GDPR and other regulatory requirements and to safeguard the secure handling of personal and operational data. The implementation of the data deletion process and the deployment of third-party screening in the areas of Information Security and Data Protection, prior to award of contracts to DESFA's providers, are key measures that uphold the confidentiality, integrity, and availability of the Company's information.

Notably, during the reporting period, DESFA recorded zero incidents involving personal data breaches and received no substantiated complaints regarding violations of customer privacy. This outcome reflects the effectiveness of the Company's data protection and compliance systems. Furthermore, DESFA did not incur any monetary losses resulting from legal proceedings associated with data security or privacy, underscoring the robustness of its governance framework and its commitment to safeguarding sensitive information.





# 07 PERFORMANCE DATA AND STANDARDS

---

**7.1 Key ESG Performance Indicators (KPIs)**

**7.2 GRI Content Index**

**7.3 ATHEX ESG Metrics**

**7.4 SASB Metrics – Oil & Gas Midstream**

# 7.1

## Key ESG

### Performance

#### Indicators (KPIs)

The below tables display the quantitative indicators of GRI Standards 2021, ATHEX ESG Reporting Guide 2024 and SASB Standard «Oil and Gas - Midstream 2018», presenting the corporate performance per material topic. The data covers the period 2022-2024 where the data are available and applicable.

SASB Standard «Oil and Gas - Midstream 2018» - Activity metrics

SASB STANDARD «OIL AND GAS - MIDSTREAM 2018»	DISCLOSURE	UNIT	2022	2023	2024
EM-MD-000.A	Total metric ton-kilometers of natural gas	Metric ton (t) kilometers	504,77	588,10	1.253,47
	Total metric ton-kilometers of crude oil	Metric ton (t) kilometers	Not applicable	Not applicable	Not applicable
	Total metric ton-kilometers of refined petroleum products transported, by mode of transport	Metric ton (t) kilometers	Not applicable	Not applicable	Not applicable

7.1  
Key ESG  
Performance  
Indicators  
(KPIs)

Material topic: Climate Change  
GRI 2-4

GRI STANDARDS 2021 ATHEX ESG REPORTING GUIDE 2024 SASB STANDARD «OIL AND GAS - MIDSTREAM 2018»	DISCLOSURE	UNIT	2022	2023	2024
GRI 302-1	Energy consumption within the organization				
	Fuel consumption within the organization from renewable sources	MJ	0	0	0
	Fuel consumption within the organization from non-renewable sources	MJ	198.877.294,99	384.366.091,31	1.212.127.636,21
	Electricity purchased and consumed, not produced from renewable sources	MJ	187.801.848,00	162.025.241,32	123.339.283,35
	Electricity consumption within the organization from renewable energy sources – with guarantees of origin	MJ	0	0	9.000.000,00
	Electricity sold	MJ	81.691,20	430.826,40	328.237,20
	Energy consumption within the organization	MJ	386.597.451,79	545.960.506,23	1.335.138.682,36
	Energy consumption breakdown				
	Diesel	MJ	10.266.268,37	9.425.478,11	10.777.146,47
	Petrol	MJ	3.919.881,59	4.489.931,81	4.947.897,49
	LPG	MJ	0	0	1.242,05
	LNG	MJ	0	0	0
	Natural Gas	MJ	184.691.145,03	370.450.657,83	1.196.401.254,98
	Electricity	MJ	187.801.848,00	162.025.241,32	114.339.283,35
	C-E3	CNG	MJ	0	23,56
Total amount of energy consumed		MWh	107.388,19	151.655,71	370.871,89
Proportion of electricity consumed		%	48,58	29,68	9,24
Proportion of energy consumed from renewable sources		%	0	0	0,67
Total amount of energy produced		MWh	1.359,40	1.085,49	1.146,14
Total energy produced form renewable sources		MWh	0	0	0
Total energy produced form non-renewable sources		MWh	1.359,40	1.085,49	1.146,14
Non-renewable energy produced		MWh (Electricity)	1.339,03	773,29	821,36
		MWh (Heating Power)	20,38	312,20	324,78
Proportion of energy consumed from renewables		%	0	0	0,67
Proportion of energy produced from renewables	%	0	0	0	



## 7.1 Key ESG Performance Indicators (KPIs)

Material topic: Climate Change  
GRI 2-4

GRI STANDARDS 2021 ATHEX ESG REPORTING GUIDE 2024 SASB STANDARD «OIL AND GAS - MIDSTREAM 2018»		DISCLOSURE	UNIT	2022	2023	2024
GRI 302-3	Energy intensity ratio for the organization					
		Energy intensity ratio for the organization	MJ/Nm <sup>3</sup>	0,07	0,12	0,23
C-E1 GRI 305-1 EM-MD-110a.1	Direct (Scope 1) GHG emissions					
		Direct (Scope 1) GHG emissions	t CO <sub>2</sub> e	18.553,46	26.520,21	69.331,01
EM-MD-110a.1		Percentage Methane	%	44,72	26,02	11,81
		Percentage covered under emissions-limiting regulations	%	43,75	66,45	85,15
GRI 305-2 C-E2	Energy indirect (Scope 2) GHG emissions					
		Location-based emissions	t CO <sub>2</sub> e	19.637,49	22.516,99	11.699,98
		Market-based emissions	t CO <sub>2</sub> e	21.522,10	16.407,99	8.654,37
		Which gases were included in the calculation of the indirect emissions		CO <sub>2</sub> , CH <sub>4</sub>	CO <sub>2</sub> , CH <sub>4</sub>	CO <sub>2</sub> , CH <sub>4</sub>
GRI 305-3 A-E1	Energy indirect (Scope 3) GHG emissions					
		Other indirect (Scope 3) GHG emissions	t CO <sub>2</sub> e	58.819,49	116.943,80	62.907,95
	Upstream					
		Purchased goods and services	t CO <sub>2</sub> e	20.296,22	16.540,34	6.022,97
		Capital goods	t CO <sub>2</sub> e	24.446,39	94.531,35	43.080,20
		Fuel-and energy-related activities	t CO <sub>2</sub> e	13.025,62	4.166,89	12.715,48
		Upstream transportation and distribution	t CO <sub>2</sub> e	319,42	409,97	457,69
		Waste generated in operations	t CO <sub>2</sub> e	1,13	1,32	3,24
		Business travel	t CO <sub>2</sub> e	149,83	175,96	367,85
		Employee commuting	t CO <sub>2</sub> e	494,82	557,76	167,26
	Downstream					
		Investments	t CO <sub>2</sub> e	86,06	560,20	93,27

7.1  
Key ESG  
Performance  
Indicators  
(KPIs)

Material topic: Climate Change  
GRI 2-4

GRI STANDARDS 2021 ATHEX ESG REPORTING GUIDE 2024 SASB STANDARD «OIL AND GAS - MIDSTREAM 2018»	DISCLOSURE	UNIT	2022	2023	2024
GRI 305-4 C-E1 C-E2	GHG emissions intensity ratio (Scope 1)	tCO <sub>2</sub> e	3,48	5,71	11,99
	GHG emissions intensity ratio (Scope 2 location-based)	grCO <sub>2</sub> e / Nm <sup>3</sup>	3,68	4,85	2,02
	GHG emissions intensity ratio (Scope 2 market-based)	grCO <sub>2</sub> e / Nm <sup>3</sup>	4,03	3,53	1,50
	GHG emissions intensity ratio (Scope 3)	grCO <sub>2</sub> e / Nm <sup>3</sup>	11,02	25,19	10,88
	GHG emissions intensity ratio (sum of Scope 1 and Scope 2 location-based emissions)	grCO <sub>2</sub> e / Nm <sup>3</sup>	7,15	10,56	14,02
	GHG emissions intensity ratio (sum of Scope 1 and Scope 2 market-based emissions)	grCO <sub>2</sub> e / Nm <sup>3</sup>	7,51	9,25	13,49
	GHG emissions intensity ratio (sum of Scope 1, Scope 2 location-based and Scope 3 emissions)	grCO <sub>2</sub> e / Nm <sup>3</sup>	18,17	35,75	24,90
	GHG emissions intensity ratio (sum of Scope 1, Scope 2 market-based and Scope 3 emissions)	grCO <sub>2</sub> e / Nm <sup>3</sup>	18,53	34,44	24,37
GRI 305-5	Reduction of GHG emissions	tCO <sub>2</sub> e	-17.324,33	- 3.328,02	-18.978,68

Notes:

- <sup>(1)</sup> Upon completion of the GHG emissions audit in 2024 for the reporting year 2023, DESFA proceeded with the restatement of reported values for Scope 1 and Scope 2 emissions (both location-based and market-based). The 2024 values for energy consumption and GHG emissions represent the current data and will be presented in the ESG Report 2024, scheduled for publication in November 2025. These values may be subject to revision following future audits.
- <sup>(2)</sup> As per GRI 302-1 indicator requires, DESFA only reports energy consumed, therefore the natural gas that led to fugitive emissions, meaning that was not consumed as fuel, is not included in the energy consumption calculation but continues to be included for the GHG emissions calculation.
- <sup>(3)</sup> Electricity consumption within the organization, with and without guarantees of origin, excludes consumption of leased buildings.
- <sup>(4)</sup> The consumption of diesel is referred to heating needs of corporate facilities, stationery and diesel generators for emergency conditions.
- <sup>(5)</sup> Calculation of energy intensity ratio includes the amount of the total consumed energy within the organization (including fuels, electricity and heating) in MJ per Nm<sup>3</sup> of transferred natural gas.
- <sup>(6)</sup> Calculation of emissions intensity ratio includes the amount of Scope 1, Scope 2 market based and Scope 3 emissions in grams of CO<sub>2</sub> equivalent per Nm<sup>3</sup> of transferred natural gas.
- <sup>(7)</sup> The calculation of the change in GHG emissions includes Scope 1 and Scope 2 market-based emissions for 2022 and 2023, and Scope 3 emissions for 2024. DESFA's Total Carbon Footprint (Scope 1,2 & 3) for the years 2023 and 2024 have been verified by an accredited third party according to ISO 14064. The calculation covers CO<sub>2</sub> and CH<sub>4</sub> emissions, using 2021 as the baseline year, as it is the earliest year for which the Company has complete and reportable data. It is noted that during 2023, reduction was occurred in Scope 2 market-based emissions.

## 7.1 Key ESG Performance Indicators (KPIs)

Material topic: Employment Practices

GRI 2-4

GRI STANDARDS 2021 ATHEX ESG REPORTING GUIDE 2024	DISCLOSURE	UNIT	2022	2023	2024
GRI 2-7	Employees				
	Number of employees	#	563	593	617
	Number of male employees	#	371	387	217
	Number of female employees	#	192	206	400
	Number of permanent employees	#	563	593	617
	Number of temporary employees	#	0	0	0
	Number of full-time employees	#	563	593	617
	Number of part-time employees	#	0	0	0
GRI 2-8	Workers who are not employees (third party employees)				
	Total number of workers who are not employees (third party employees) and whose work is controlled by the organization (full-time employees)	#	105	102	102
	Total number of workers who are not employees (third party employees) and whose work is controlled by the organization (average construction contractor personnel per month)	#	167	395	782
C-S2	Percentage of female workers	%	34	35	35
C-S3	Percentage of female employees in top 10% of employees by total compensation	%	30	30	34

**Note:** In the ESG Report 2023 it was inadvertently stated that "Percentage of female employees in top 10% of employees by total compensation" was 31% instead of 30%.



7.1  
Key ESG  
Performance  
Indicators  
(KPIs)

Material topic: Employment Practices  
GRI 2-4

GRI STANDARDS 2021 ATHEX ESG REPORTING GUIDE 2024	DISCLOSURE	UNIT	2022		2023		2024	
			MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
GRI 404-1	Average hours of training per employee							
	Average training hours per year per employee	h	15,99	12,84	36,70 <sup>3</sup>	30,60 <sup>3</sup>	29,00 <sup>4</sup>	22,24 <sup>4</sup>
	Administrative staff	h	8,47	9,49	23,25 <sup>2</sup>	24,17 <sup>2</sup>	25,27	21,15
	Technicians	h	14,90	4,45	45,47 <sup>3</sup>	37,37 <sup>3</sup>	31,54	23,63
	Craftsmen - other	h	33,19	46,70	23,56	49,61	25,26	25,11
C-S5	Employees in the top 10% by total compensation <sup>1</sup>	h	33,19	46,70	23,56	49,61	25,26	25,11
	Employees in the bottom 90% by total compensation	h	13,12	8,24	39,38	27,58	29,66	21,76

**Notes:**

<sup>(1)</sup> In 2022, DESFA had an extensive team leadership program for the N-1 level (N-1 is part of the "top 10% of employees by total compensation"), which is mainly made up of male employees. This program did not take place in 2022. In 2022, DESFA also had some N-1 & N-2 level participation in Gas Tech (for gas technologies), which was also a one-off.

<sup>(2)</sup> The difference in administration is created by the launch of the DESFA training Curriculum in early 2023 (which was not in place in 2022) and which offers more and varied trainings in which employees participate.

<sup>(3)</sup> In 2023, the number of technicians hired was increased and the new employees participated on a training plan on all relevant issues. In addition, new training courses have been added in relation to the new obligations arising in the technical area, which have been completed by all technicians (e.g., Emergency Response Plan training).

<sup>(4)</sup> In 2024, the reduction in training hours—despite new hires and an increase in the number of employees—is attributed to the alignment of training activities with specific business needs during the reporting year.

## 7.1 Key ESG Performance Indicators (KPIs)

Material topic: Employment Practices

GRI 2-4

GRI STANDARDS 2021 ATHEX ESG REPORTING GUIDE 2024	DISCLOSURE	UNIT	TOTAL	FEMALE	MALE	<30 YEARS OLD	30-50 YEARS OLD	>50 YEARS OLD
GRI 401-1	2024							
	Number of new employee hires	#	51	15	36	18	32	1
	Ratio of new employee hires	%	8,27	6,91	9,00	47,37	9,88	0,39
	Number of employee turnover	#	28	4	24	0	8	20
	Ratio of employee turnover	%	4,54	1,84	6,00	0,00	2,47	7,84
	2023							
	Number of new employee hires	#	58	22	36	10	40	8
	Ratio of new employee hires	%	9,78	10,68	9,30	52,63	12,78	3,07
	Number of employee turnover	#	30	9	21	2	9	19
	Ratio of employee turnover	%	5,06	4,37	5,43	10,53	2,88	7,28
	2022							
	Number of new employee hires	#	78	42	36	5	53	20
	Ratio of new employee hires	%	13,85	21,88	9,70	35,71	17,79	7,97
	Number of employee turnover	#	24	6	18	2	11	11
	Ratio of employee turnover	%	4,26	3,13	5,39	14,29	3,69	4,38
C-S4	2024							
	Voluntary turnover rate	%	1,32	Not available	Not available	Not available	Not available	Not available
	Involuntary turnover rate	%	0	Not available	Not available	Not available	Not available	Not available
	2023							
	Voluntary turnover rate	%	1,73	Not available	Not available	Not available	Not available	Not available
	Involuntary turnover rate	%	0	Not available	Not available	Not available	Not available	Not available
	2022							
	Voluntary turnover rate	%	2,61	Not available	Not available	Not available	Not available	Not available
	Involuntary turnover rate	%	0	Not available	Not available	Not available	Not available	Not available

**Notes:**

<sup>(1)</sup> The “Other” and “Not Disclosed” percentages are zero for all categories for the years 2022-2024.

<sup>(2)</sup> The calculation methodology of “Ratio of new employee hires” and “Ratio of employee turnover” changed and DESFA proceeded to re-calculate them in 2023 period.

7.1  
Key ESG  
Performance  
Indicators  
(KPIs)

Material topic: Employment Practices

GRI 2-4

GRI STANDARDS 2021	DISCLOSURE	UNIT	TOTAL	FEMALE	MALE	OTHER	NOT DISCLOSED
GRI 401-3	2024						
	Total number of employees that were entitled to parental leave	#	18	15	3	0	0
	Total number of employees that took parental leave	#	18	15	3	0	0
	Total number of employees that returned to work after parental leave ended	#	10	8 <sup>3</sup>	2 <sup>3</sup>	0	0
	Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work	#	17	15	2	0	0
	Total number of employees due to return to work after taking parental leave	#	10	8	2	0	0
	Return to work rate (%)	%	100	100	100	0	0
	Retention rate (%)	%	100	100	100	0	0
	2023						
	Total number of employees that were entitled to parental leave	#	18	16	2	0	0
	Total number of employees that took parental leave	#	18	16	2	0	0
	Total number of employees that returned to work after parental leave ended	#	17	15 <sup>2</sup>	2	0	0
	Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work	#	16	14	2	0	0
	Total number of employees due to return to work after taking parental leave	#	17	15	2	0	0
	Return to work rate (%)	%	100	100	100	0	0
	Retention rate (%)	%	100	100	100	0	0
	2022						
	Total number of employees that were entitled to parental leave	#	20	18	2	0	0
	Total number of employees that took parental leave	#	20	18	2	0	0
	Total number of employees that returned to work after parental leave ended	#	16	14 <sup>1</sup>	2	0	0
	Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work	#	14	12	2	0	0
	Total number of employees due to return to work after taking parental leave	#	16	14	2	0	0
	Return to work rate (%)	%	100	100	100	0	0
	Retention rate (%)	%	100	100	100	0	0

Notes:

<sup>(1)</sup> The four women who had not returned during 2022 resumed their duties in 2023.

<sup>(2)</sup> The one woman who had not returned during 2023 resumed her duties in 2024.

<sup>(3)</sup> The seven women and one man who have not returned during 2024 are expected to resume their duties in 2025, upon completion of their leave.



## 7.1 Key ESG Performance Indicators (KPIs)

Material topic: Impacts on Local Communities & Energy Access

GRI STANDARDS 2021	DISCLOSURE	UNIT	2022	2023	2024
GRI 201-1	Direct economic value generated and distributed <sup>1</sup>				
	Direct economic value generated				
	Revenues	thousand €	323.350	597.935 <sup>2</sup>	357.016 <sup>3</sup>
	Economic value distributed				
	Operating Costs	thousand €	134.920	306.541	126.870
	Employee wages and benefits		27.870	32.316	34.415
	Payments to providers of capital		6.748	7.679	14.415
	Payments to government		16.052	39.826	23.133
	Community investments		325	351	463
	Total economic value distributed		185.915	386.713	199.296
	Economic value retained				
	Direct economic value generated	thousand €	323.350	597.935	357.016
	Economic value distributed		185.915	386.713	199.296
	Total retained value		137.435	211.222	157.720
GRI 202-2	Proportion of senior management hired from the local community <sup>4,5</sup>				
	Proportion of senior management hired from the local community	%	15	16	16

### Notes:

<sup>(1)</sup> The table above depicts P&L figures (e.g., invoices & provisions) and not cash movements for the period. The P&L figures translate to Cash movements with a lag of 1-2 months.

<sup>(2)</sup> Total revenues of reporting period 2023 amounted to € 597.935 thousand including the turnover (€ 573.157 thousand) plus other operating income & interest income. The increase in 2023 revenues is mainly related to DESFA's regulated services (large amounts of auction premia in 2023 and some higher capacity bookings and tariffs compared to 2022), as well as to revenues from profit neutral operations (result of the realization of the Security of Supply actions of the 2022 Preventing Action Plan (PAP) and the higher costs for Balancing Gas (prices and quantities).

<sup>(3)</sup> Total revenues for the reporting period 2024 amounted to € 357.016 thousand, comprising turnover (€ 321.076 thousand), other operating income, and interest income. The decrease observed in 2024 is primarily attributed to: (a) a significant reduction in Regulated Revenues due to the exceptionally high auction premia recorded in 2023; (b) the implementation of the 2022 Preventive Action Plan under the Security of Supply Activity, which included exceptional measures for the winter of 2022–2023 (e.g., underground storage in neighboring countries during 2023); and (c) lower revenues from LNG operational gas, driven by reduced demand in 2024 compared to 2023, as well as decreased revenues from Balancing Gas activities.

<sup>(4)</sup> DESFA defines senior management as the N-2 organizational roles of the Company and above, according to the respective divisional size and scope and the business geographical definition of local by the base locations of our Company such as Revithoussa, Patima, New Messimvria, Sidirokastro and the surrounding areas.

<sup>(5)</sup> DESFA's geographical definition refers to Greece and more specifically, Central Greece, Peloponnese, Thessaly, Macedonia and Thrace. All network locations are considered as significant since they constitute distinctive organizational areas regarding corporate operation.

7.1  
Key ESG  
Performance  
Indicators  
(KPIs)

Material topic: Impacts on Local Communities & Energy Access

GRI STANDARDS 2021	DISCLOSURE	2022		2023		2024	
		VALUE OF PERIOD PURCHASES (€)	VALUE OF PERIOD PURCHASES (%)	VALUE OF PERIOD PURCHASES (€)	VALUE OF PERIOD PURCHASES (€)	VALUE OF PERIOD PURCHASES (€)	VALUE OF PERIOD PURCHASES (€)
PROPORTION OF SPENDING ON LOCAL SUPPLIERS							
GRI 204-1	National suppliers	184.772.006,66	47,53%	133.115.783,71	59,03%	50.473.183,17	39,49%
	Central Greece	183.363.225,57	93,51%	132.393.371,65	85,84%	49.539.456,11	68,35%
	Peloponnese	0	0,00%	1.169,35	0,05%	0	0,00%
	Macedonia	1.336.631,88	2,99%	515.028,82	1,67%	830.675,33	2,02%
	Thessaly	33.664,94	0,06%	73.736,28	0,87%	7.801,66	0,22%
	Thrace	38.484,27	0,04%	132.477,61	0,45%	95.250,07	0,90%
	International suppliers	203.997.339,61	52,47%	92.389.395,52	40,97%	77.326.991,86	60,51%
	Central Greece	12.720.846,61	6,49%	21.843.077,27	14,16%	22.940.662,55	31,65%
	Peloponnese	1.895.853,36	100,00%	2.568.631,14	99,95%	107.434,00	100%
	Macedonia	43.404.094,09	97,01%	30.253.607,55	98,33%	40.268.709,23	97,98%
	Thessaly	57.806.786,30	99,94%	8.391.242,95	99,13%	3.576.588,89	99,78%
	Thrace	88.169.759,25	99,96%	29.332.836,61	99,55%	10.433.597,19	99,10%
	Total	388.769.346,27	100,00%	225.505.179,23	100,00%	127.800.175,03	100,00%
	Central Greece	196.084.072,18	100,00%	154.236.448,92	100,00%	72.480.118,66	100,00%
	Peloponnese	1.895.853,36	100,00%	2.569.800,49	100,00%	107.434,00	100,00%
	Macedonia	44.740.725,97	100,00%	30.768.636,37	100,00%	41.099.384,56	100,00%
	Thessaly	57.840.451,24	100,00%	8.464.979,23	100,00%	3.584.390,55	100,00%
	Thrace	88.208.243,52	100,00%	29.465.314,22	100,00%	10.528.847,26	100,00%

**Note:** DESFA's geographical definition of local refers to regions of Greece and more specifically, Central Greece, Peloponnese, Macedonia, Thessaly and Thrace and it is closely related to the Facilities of the Purchase Requisition/ Demand. Therefore, DESFA considers local suppliers as those who are based within the demand regions and as non-local suppliers as those who are based outside the demand regions, e.g. other suppliers from the domestic market (Greece) as also suppliers from abroad (international).

## 7.1 Key ESG Performance Indicators (KPIs)

Material topic: Business Conduct and Compliance

GRI STANDARDS 2021 ATHEX ESG REPORTING GUIDE 2024	DISCLOSURE	UNIT	2022	2023	2024
GRI 2-27	Total number of fines for instances of non-compliance with laws and regulations	#	0	0	0
	Monetary value of fines for instances of non-compliance with laws and regulations	€	0	0	0
GRI 201-4	Financial assistance received from government	thousand €	7.396	5.966	9.381
GRI 205-1	Operations assessed for risks related to corruption	%	100	100	100
GRI 205-3	Confirmed incidents of corruption	#	0	0	0
GRI 206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	#	0	0	0
A-G2	Total amount of monetary losses as a result of court proceedings associated with charges of bribery or corruption	€	0	0	0
	Total amount of monetary losses as a result of court proceedings associated with charges of anti-competitive practices	€	0	0	0
SS-S4	Labor law violations	€	0	0	31.000

**Note:** A fine was imposed in 2012. By virtue of a court decision € 1.110.585,98 was paid in 2021; The decision imposing the fine has been challenged judicially and as of the publication of the ESG Report 2024, the relevant court ruling remains pending.



7.1  
Key ESG  
Performance  
Indicators  
(KPIs)

Material topic: Cybersecurity and Data Protection

GRI STANDARDS 2021 ATHEX ESG REPORTING GUIDE 2024	DISCLOSURE	UNIT	2022	2023	2024
GRI 418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	#	0	0	0
SS-S5	Total amount of monetary losses as a result of legal proceedings associated with data security and privacy	€	0	0	0

## 7.2 GRI Content Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES							
GRI 2: GENERAL DISCLOSURES 2021	2-1 Organizational details	2. About DESFA 2.1 Corporate Profile	15	A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.			
	2-2 Entities included in the organization's sustainability reporting	1. Introduction 1.3 About this report	12				
	2-3 Reporting period, frequency and contact point	1. Introduction 1.3 About this report	12				
	2-4 Restatements of information	7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	118,119 120,121 122,123,124				
	2-5 External assurance	1. Introduction 1.3 About this report	12				
	2-6 Activities, value chain and other business relationships	2. About DESFA 2.2 Business Model and Value Chain	20, 23				
	2-7 Employees	5. Society 5.1 Employment practices and Labor Conditions	93				
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	121				
	2-8 Workers who are not employees	5. Society 5.1 Employment practices and Labor Conditions	93				
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	121				

7.2  
GRI Content  
Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES							
	2-9 Governance structure and composition	<b>6. Governance and Ethics</b> 6.1 Corporate Governance Structure and Oversight	104, 105-106				
	2-10 Nomination and selection of the highest governance body	<b>6. Governance and Ethics</b> 6.1 Corporate Governance Structure and Oversight	104,106	2-10b	Not applicable	The Members of the Board are appointed as per the provisions of the Articles of Association on the basis of the current allocation of voting rights among the Shareholders.	
	2-11 Chair of the highest governance body	<b>6. Governance and Ethics</b> 6.1 Corporate Governance Structure and Oversight	104				
	2-12 Role of the highest governance body in overseeing the management of impacts	<b>3. Sustainability Management and Stakeholder Engagement</b> 3.2 Sustainability Oversight	45-46				
	2-13 Delegation of responsibility for managing impacts	<b>3. Sustainability Management and Stakeholder Engagement</b> 3.2 Sustainability Oversight	45-46				
	2-14 Role of the highest governance body in sustainability reporting	<b>3. Sustainability Management and Stakeholder Engagement</b> 3.2 Sustainability Oversight	45-46				
		<b>3. Sustainability Management and Stakeholder Engagement</b> 3.5 Double Materiality Assessment	53				
	2-15 Conflicts of interest	<b>6. Governance and Ethics</b> 6.2 Ethics, Integrity and Business Conduct	112				
	2-16 Communication of critical concerns	<b>6. Governance and Ethics</b> 6.2 Ethics, Integrity and Business Conduct	112				
	2-17 Collective knowledge of the highest governance body	<b>6. Governance and Ethics</b> 6.1 Corporate Governance Structure and Oversight	104				
2-18 Evaluation of the performance of the highest governance body			2-18 a, 2-18 b, 2-18 c	Not applicable	Evaluating the performance of the Board in overseeing the management of the Company's impacts on the economy, environment, and people, is not foreseen at the moment.		



## 7.2 GRI Content Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES							
	2-19 Remuneration policies	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	111				
	2-20 Process to determine remuneration	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	111	2-20 b	Confidentiality constraints	DESFA considers the required information confidential due to competition reasons and its employee's security.	
	2-21 Annual total compensation ratio			2-21 a, 2-21 b, 2-21 c	Confidentiality constraints		
	2-22 Statement on sustainable development strategy	1. Introduction 1.1 CEO message	5-7				
	2-23 Policy commitments	5. Society 5.1 Employment practices and Labor Conditions	84				
		6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	109, 110				
	2-24 Embedding policy commitments	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	109, 110				
	2-25 Processes to remediate negative impacts	4. Environment 4.4 Supplier Environmental impacts	81				
		6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	112				
	2-26 Mechanisms for seeking advice and raising concerns	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	112				
	2-27 Compliance with laws and regulations	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	111				
		7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	127				

7.2  
GRI Content  
Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES							
	2-28 Membership associations	2. About DESFA 2.4 Memberships and Industry Alliances	28				
	2-29 Approach to stakeholder engagement	3. Sustainability Management and Stakeholder Engagement 3.3 Stakeholder Engagement and Communication	47-50				
	2-30 Collective bargaining agreements	5. Society 5.1 Employment practices and Labor Conditions	93				
MATERIAL TOPICS							
GRI 3: MATERIAL TOPICS 2021	3-1 Process to determine material topics	3. Sustainability Management and Stakeholder Engagement 3.5 Double Materiality Assessment	52-53	A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.			
	3-2 List of material topics	3. Sustainability Management and Stakeholder Engagement 3.5 Double Materiality Assessment	54-56				
ENVIRONMENT							
Climate Change							
GRI 3: MATERIAL TOPICS 2021	3-3 Management of material topics	4. Environment 4.1 Climate Change Mitigation and Adaptation	59-67				11.1.1 / 11.2.1
GRI 201: ECONOMIC PERFORMANCE 2016	201-2 Financial implications and other risks and opportunities due to climate change	4. Environment 4.1 Climate Change Mitigation and Adaptation	64-67				11.2.2

## 7.2 GRI Content Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
ENVIRONMENT							
Climate Change							
GRI 302: ENERGY 2016	302-1 Energy consumption within the organization	4. Environment 4.2 Carbon Footprint and Energy	74-75				11.1.2
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	118				
	302-2 Energy consumption outside of the organization			302-2 a, 302-2 b, 302-2 c	Information unavailable	<p>DESFA uses the upstream and downstream categories and activities from the 'GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard' for identifying relevant emission sources outside of the organization.</p> <p>"Fuel-and energy-related activities (other than fugitives)" category which constitutes 20,16% of Scope 3 emissions, is already included in GRI 302-1 (apart from fugitive emissions which are excluded from the scope).</p> <p>"Purchased goods and services", "Capital goods" and "Investments" constitute 78,10% of Scope 3 emissions and cannot be converted into "energy consumption outside the organization" due to the methodology used to calculate the emissions which is based on spent report.</p> <p>"Upstream transportation and distribution", "business travel" and "employee commuted" are not reported under 302-2 as they constitute 0,53% of the Scope 3 emissions and are deemed insignificant by the Company to proceed with the calculation.</p>	11.1.3
	302-3 Energy intensity	4. Environment 4.2 Carbon Footprint and Energy	74-75				11.1.4
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	119				
	GRI 305: EMISSIONS 2016	305-1 Direct (Scope 1) GHG emissions	4. Environment 4.2 Carbon Footprint and Energy	70			
7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)			119				



7.2  
GRI Content  
Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
ENVIRONMENT							
Climate Change							
GRI 305: EMISSIONS 2016	305-2 Energy indirect (Scope 2) GHG emissions	4. Environment 4.2 Carbon Footprint and Energy	70-71				11.1.6
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	119				
	305-3 Other indirect (Scope 3) GHG emissions	4. Environment 4.2 Carbon Footprint and Energy	71				11.1.7
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	119				
	305-4 GHG emissions intensity	4. Environment 4.2 Carbon Footprint and Energy	72				11.1.8
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	120				
	305-5 Reduction of GHG emissions	7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	120				11.2.3
ADDITIONAL SECTOR DISCLOSURE	Describe the organization's approach to public policy development and lobbying on climate change	4. Environment 4.1 Climate Change Mitigation and Adaptation	66				11.2.4
Biodiversity							
GRI 3: MATERIAL TOPICS 2021	3-3 Management of material topics	4. Environment 4.3 Biodiversity and Ecosystem Impacts	76-79				11.4.1 / 11.15.1 / 11.16.1
GRI 304: BIODIVERSITY 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	4. Environment 4.3 Biodiversity and Ecosystem Impacts	77				11.4.2
	304-2 Significant impacts of activities, products and services on biodiversity	4. Environment 4.3 Biodiversity and Ecosystem Impacts	77-78				11.4.3

## 7.2 GRI Content Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
Biodiversity							
GRI 304: BIODIVERSITY 2016	304-3 Habitats protected or restored	4. Environment 4.3 Biodiversity and Ecosystem Impacts	79	304-3 a	Information incomplete	Protected areas under European regulations are presented in unit 4.3 "Biodiversity and Ecosystems Impacts" in section "NNGS within Protected Areas" . The size and location of habitat areas protected or restored were not available until the publication of the ESG Report 2024.  DESFA aims to include the requirements of the indicator in future reporting period.	11.4.4
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	<p>All DESFA's EIAs include a comprehensive overview of the species engaged in a project's area, detailing their conservation status according to the IUCN Red List and other relevant national or international frameworks. EIAs identify species listed under various levels of extinction risk and highlight those with hab- itats located within or adjacent to the areas affected by the organization's operations.</p> <p>EIAs further provide an assessment of potential impacts on all biodiversity species, including those of special conservation concern, outlining mitigation measures designed to minimize adverse effects and promote the preservation of ecosystems.</p> <p>DESFA aims to include the requirements of the indicator in future reporting period.</p>					11.4.5
GRI 413: LOCAL COMMUNITIES 2016	413-2 Operations with significant actual and potential negative impacts on local communities	4. Environment 4.3 Biodiversity and Ecosystem Impacts	78-79				11.15.3
ADDITIONAL SECTOR DISCLOSURES	List the locations of operations that caused or contributed to involuntary resettlement or where such resettlement is ongoing	No involuntary resettlement occurred during 2024 in areas of operation					11.16.2

7.2  
GRI Content  
Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
Supplier Environmental Impacts							
GRI 3: MATERIAL TOPICS 2021	3-3 Management of material topics	4. Environment 4.4 Supplier Environmental Impacts	80-81				11.15.1
GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016	308-2 Negative environmental impacts in the supply chain and actions taken	4. Environment 4.4 Supplier Environmental Impacts	80				No reference
GRI 413: LOCAL COMMUNITIES 2016	413-1 Operations with local community engagement, impact assessments, and development programs	4. Environment 4.4 Supplier Environmental Impacts	81				11.15.2
ADDITIONAL SECTOR DISCLOSURES	Report on the number and type of grievances from local communities identified	4. Environment 4.4 Supplier Environmental Impacts)	81				11.15.4
Waste							
GRI 306: WASTE 2020					Non-material	Waste generation is limited to construction and maintenance activities, managed through strict mitigation and regulatory compliance; impacts are localized and reversible, with low likelihood of systemic financial or environmental materiality.	11.5.1 11.5.2 11.5.3 11.5.4 11.5.5 11.5.6
Water and Effluents							
GRI 303: WATER AND EFFLUENTS 2018					Non-material	Water use and discharge occur mainly during hydrotesting and LNG operations under controlled conditions; mitigation measures and regulatory oversight keep impacts minimal and non- material across time horizons.	11.6.1 11.6.2 11.6.3 11.6.4 11.6.5 11.6.6



## 7.2 GRI Content Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
Closure and Rehabilitation							
GRI 402: LABOR/MANAGEMENT RELATIONS 2016  GRI 404: TRAINING AND EDUCATION 2016					Non-material	The business of the Company does not include closure and rehabilitation of operational sites, therefore the respective impacts on the environment, local communities and workers were considered not applicable.	11.7.1 11.7.2 11.7.3 11.7.4 11.7.5 11.7.6
Asset Integrity and Critical incident Management							
GRI 306: EFFLUENTS AND WASTE 2016					Non-material	Asset integrity risks are addressed through robust maintenance and safety systems; likelihood of catastrophic incidents is low, and potential impacts remain below materiality thresholds unless systemic failures occur.	11.8.1 11.8.2 11.8.3 11.8.4
SOCIETY							
Impacts on Local Communities & Energy Access							
GRI 3: MATERIAL TOPICS 2021	3-3 Management of material topics	5. Society 5.2 Socioeconomic Impact and Energy Access	95-99				11.14.1
GRI 201: ECONOMIC PERFORMANCE 2016	201-1 Direct economic value generated and distributed	5. Society 5.2 Socioeconomic Impact and Energy Access	96-97				11.14.2
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	125				
GRI 202: MARKET PRESENCE 2016	202-2 Proportion of senior management hired from the local community	5. Society 5.2 Socioeconomic Impact and Energy Access	98-99				11.14.3
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	125				
GRI 203: INDIRECT ECONOMIC IMPACTS 2016	203-1 Infrastructure investments and services supported	5. Society 5.2 Socioeconomic Impact and Energy Access	96				11.14.4
	203-2 Significant indirect economic impacts	5. Society 5.2 Socioeconomic Impact and Energy Access	96,98				203-2 b

7.2  
GRI Content  
Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
SOCIETY							
Impacts on Local Communities & Energy Access							
GRI 204: PROCUREMENT PRACTICES 2016	204-1 Proportion of spending on local suppliers	5. Society 5.2 Socioeconomic Impact and Energy Access	96-97				11.14.6
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	126				
Employment Practices							
GRI 3: MATERIAL TOPICS 2021	3-3 Management of material topics	5. Society 5.1 Employment practices and Labor Conditions	83-94				11.10.1
GRI 401: EMPLOYMENT 2016	401-1 New employee hires and employee turnover	5. Society 5.1 Employment practices and Labor Conditions	93-94				11.10.2
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	123				
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	5. Society 5.1 Employment practices and Labor Conditions	85				11.10.3
	401-3 Parental leave	5. Society 5.1 Employment practices and Labor Conditions	93				11.10.4
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	124				
GRI 402: LABOR / MANAGEMENT RELATIONS 2016	402-1 Minimum notice periods regarding operational changes	5. Society 5.1 Employment practices and Labor Conditions	84				11.10.5
GRI 404: TRAINING AND EDUCATION 2016	404-1 Average hours of training per year per employee	5. Society 5.1 Employment practices and Labor Conditions	87, 89,90				11.10.6
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	122				
	404-2 Programs for upgrading employee skills and transition assistance programs	5. Society 5.1 Employment practices and Labor Conditions	87-88				11.10.7

## 7.2 GRI Content Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
Employment Practices							
GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016	414-1 New suppliers that were screened using social criteria				Information unavailable	DESFA applied a Vendor Qualification Process, which was in a pilot phase during 2024 for selected suppliers.  DESFA aims to include the requirements of the indicator in future reporting period.	11.10.8
Occupational Health and Safety							
GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018					Non-material	OHS risks are managed through established safety protocols and compliance frameworks; incidents are rare and financial exposure is contained via insurance and regulatory mechanisms, preventing materiality.	11.9.1 11.9.2 11.9.3 11.9.4 11.9.5 11.9.6 11.9.7 11.9.8 11.9.9 11.9.10 11.9.11
Non-discrimination and Equal Opportunity							
GRI 405 DIVERSITY AND EQUAL OPPORTUNITY 2016					Non-material	Policies and controls ensure compliance with EU labor standards; isolated cases have limited scope and remediability, making systemic risk or significant stakeholder impact unlikely.	11.11.1
GRI 406: NON-DISCRIMINATION 2016							11.11.2 11.11.3 11.11.4 11.11.5 11.11.6 11.11.7
Forced Labor and Modern Slavery							
GRI 409: FORCED OR COMPULSORY LABOR 2016					Non-material	DESFA operates in a highly regulated EU and national context with strong due diligence and supplier controls; risk occurrence is rare and financial or reputational exposure remains immaterial.	11.12.1 11.12.2 11.12.3
Rights of Indigenous Peoples							
GRI 411: RIGHTS OF INDIGENOUS PEOPLES 2016					Non-material	Operations are located in Greece, where indigenous rights issues are not present; no interaction with indigenous communities eliminates potential impact or financial relevance.	11.17.1 11.17.2 11.17.3 11.17.4



## 7.2


### GRI Content Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GOVERNANCE							
Business Conduct & Compliance							
GRI 3: MATERIAL TOPICS 2021	3-3 Management of material topics	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	108-112				11.19.1 11.20.1 11.22.1
GRI 201: ECONOMIC PERFORMANCE 2016	201-4 Financial assistance received from government	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	111				11.21.3
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	127				
GRI 205: ANTI-CORRUPTION 2016	205-1 Operations assessed for risks related to corruption	7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	127				11.20.2
	205-2 Communication and training about anti-corruption policies and procedures	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	110				11.20.3
	205-3 Confirmed incidents of corruption and actions taken	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	110				11.20.4
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	127				
	GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	111			
7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)			127				
GRI 415 PUBLIC POLICY 2016	415-1 Political contributions	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	110-111				11.22.2
ADDITIONAL SECTOR DISCLOSURES	Describe the approach to contract transparency	6. Governance and Ethics 6.2 Ethics, Integrity and Business Conduct	110				11.20.5
	List the organization's beneficial owners				Not applicable	This indicator is not relevant to the activity of DESFA since the Company is not involved with the exploration or production oil, gas or mining license or contract.	11.20.6

## 7.2 GRI Content Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORT REFERENCE	PAGE	OMISSION			GRI SECTOR STANDARD REF. NO.
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
Responsible Procurement							
GRI 3: MATERIAL TOPICS 2021	3-3 Management of material topics	6. Governance and Ethics 6.3 Responsible Procurement	113				11.13.1
GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	6. Governance and Ethics 6.3 Responsible Procurement	113				11.13.2
GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016	414-2 Negative social impacts in the supply chain and actions taken	6. Governance and Ethics 6.3 Responsible Procurement	113				11.10.9
Cybersecurity and Data Protection							
GRI 3: MATERIAL TOPICS 2021	3-3 Management of material topics	6. Governance and Ethics 6.4 Cybersecurity and Data Protection	114-115				No reference
GRI 418: CUSTOMER PRIVACY 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	6. Governance and Ethics 6.4 Cybersecurity and Data Protection	115				No reference
		7. Performance Data and Standards 7.1 Key ESG Performance Indicators (KPIs)	128				
Conflict and Security							
GRI 410: SECURITY PRACTICES 2016					Non-material	DESFA's activities occur in a stable geopolitical environment; security risks are minimal and mitigated through emergency planning and insurance, with no material financial or social implications.	11.18.1 11.18.2

7.3  
ATHEX  
ESG Metrics

ESG CLASSIFICATION	ID	METRIC TITLE	REPORT REFERENCE	PAGE	NOTES
CORE METRICS					
 ENVIRONMENTAL	C-E1	Scope 1 emissions	4. Environment 4.2 Carbon Footprint and Energy	70,72	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	119,120	
	C-E2	Scope 2 emissions	4. Environment 4.2 Carbon Footprint and Energy	70,72	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	119,120	
	C-E3	Energy consumption and production	4. Environment 4.2 Carbon Footprint and Energy	74	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	118	
 SOCIAL	C-S1	Stakeholder engagement	3. Sustainability Management and Stakeholder Engagement 3.3 Stakeholder Engagement and Communication	47-50	
	C-S2	Female employees	5. Society 5.1 Employment practices and Labor Conditions	93-94	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	121	
	C-S3	Female employees in management positions	5. Society 5.1 Employment practices and Labor Conditions	93	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	121	
	C-S4	Employee turnover	5. Society 5.1 Employment practices and Labor Conditions	93-94	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	123	
	C-S5	Employee training	5. Society 5.1 Employment practices and Labor Conditions	87-90	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	122	
	C-S6	Human rights policy	6. Governance 6.2 Ethics, Integrity and Business Conduct	109	DESFA has its policy integrated as a separate section in the Code of Ethics



## 7.3

### ATHEX

### ESG Metrics

ESG CLASSIFICATION	ID	METRIC TITLE	REPORT REFERENCE	PAGE	NOTES
CORE METRICS					
 SOCIAL	C-S7	Collective bargaining agreements	5. Society 5.1 Employment practices and Labor Conditions	93	
	C-S8	Value chain	4. Environment 4.4 Supplier Environmental Impacts	80	DESFA has established a Vendor Qualification Procedure, which was implemented in a pilot phase during 2024 to assess and qualify selected vendors. In addition, the company applies a structured tendering and agreement process—available on its website—to ensure responsible procurement and address supplier-related environmental impacts.
			6. Governance 6.3 Responsible Procurement	113	
 GOVERNANCE	C-G1	Board composition	6. Governance 6.1 Corporate Governance Structure and Oversight	104	The ESG related qualifications of the board members are not available
	C-G2	Sustainability oversight	3. Sustainability Management and Stakeholder Engagement 3.2 Sustainability Oversight	45-46	
	C-G3	Materiality	3. Sustainability Management and Stakeholder Engagement 3.5 Double Materiality Assessment	52-57	
	C-G4	Sustainability policy	3. Sustainability Management and Stakeholder Engagement 3.1 ESG Strategy and targets	35-36	
	C-G5	Business ethics policy	6. Governance 6.2 Ethics, Integrity and Business Conduct	109	
	C-G6	Data security policy	6. Governance 6.4 Cybersecurity and Data Protection	115	
ADVANCED METRICS					
 ENVIRONMENTAL	A-E1	Scope 3 emissions	4. Environment 4.2 Carbon footprint and Energy	71	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	119	
	A-E2	Climate change risks and opportunities	4. Environment 4.1 Climate Change Mitigation and Adaptation	59, 62, 64-67	
	A-E5	Biodiversity sensitive areas	4. Environment 4.3 Biodiversity and Ecosystem Impacts	77	

7.3  
ATHEX  
ESG Metrics

ESG CLASSIFICATION	ID	METRIC TITLE	REPORT REFERENCE	PAGE	NOTES
ADVANCED METRICS					
 ENVIRONMENTAL	A-E6	Climate change policy	4. Environment 4.1 Climate Change Mitigation and Adaptation	60-61	
	A-E8	Total GHG emissions	4. Environment 4.2 Carbon footprint and Energy	70	
 GOVERNANCE	A-G1	Strategy, business mode and value chain	2. About DESFA 2.2 Business Model and Value Chain	20,23	
	A-G2	Business ethics violations	6. Governance 6.2 Ethics, Integrity and Business Conduct	111	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	127	
	A-G3	ESG targets	3. Sustainability Management and Stakeholder Engagement 3.1 ESG Strategy and targets	37-44	
	A-G5	External assurance	1. Introduction 1.3 About this report	12	
SECTOR SPECIFIC METRICS					
 ENVIRONMENTAL	SS-E1	Transition plan	4. Environment 4.1 Climate Change Mitigation and Adaptation	64-67	
 SOCIAL	SS-S4	Labour law violations	6. Governance 6.2 Ethics, Integrity and Business Conduct	111	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	127	
	SS-S5	Data security and privacy fines	6. Governance 6.4 Cybersecurity and Data Protection	115	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	128	
	SS-S9	Grievance mechanism	6. Governance 6.2 Ethics, Integrity and Business Conduct	112	
 GOVERNANCE	SS-G1	Whistleblower policy	6. Governance 6.2 Ethics, Integrity and Business Conduct	112	

## 7.4

### SASB Metrics – Oil & Gas Midstream

TOPIC	CODE	ACCOUNTING METRIC	REPORT REFERENCE	PAGE	NOTES
CORE METRICS					
	EM-MD-000.A	Total metric ton-kilometers of natural gas	5. Society 5.2 Socioeconomic Impact and Energy Access	96	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	117	
		Total metric ton-kilometers of crude oil			Not applicable
		Total metric ton-kilometers of refined petroleum products transported, by mode of transport			Not applicable
GREENHOUSE GAS EMISSIONS	EM-MD-110a.1	Gross global Scope 1 emissions, percentage methane, percentage covered under emissions-limiting regulations	4. Environment 4.2 Carbon Footprint and Energy	70	
			7. Performance Data and Standards 7.1 ESG Key Performance Indicators (KPIs)	119	
	EM-MD-110a.2	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	4. Environment 4.1 Climate Change Mitigation and Adaptation	60-61	
	EM-MD-160a.1	Description of environmental management policies and practices for active operations	4. Environment 4.1 Climate Change Mitigation and Adaptation	60-61	
			4. Environment 4.3 Biodiversity and Ecosystem Impacts	78-79	
ECOLOGICAL IMPACTS	EM-MD-160a.2	Percentage of land owned, leased and/or operated within areas of protected conservation status or endangered species habitat	4. Environment 4.3 Biodiversity and Ecosystem Impacts	77	
OPERATIONAL SAFETY, EMERGENCY PREPAREDNESS & RESPONSE	EM-MD-540a.1	Number of reportable pipeline incidents, percentage significant	3. Sustainability Management and Stakeholder Engagement 3.1 ESG Strategy and targets	38	
	EM-MD-540a.4	Discussion of management systems used to integrate a culture of safety and emergency preparedness throughout the value chain and throughout project lifecycles	5. Society 5.1 Employment practices and Labor Conditions	91-92	





# 08 ANNEXES

---

GLOSSARY

## 8.1 Glossary

AGIs: Permanent Above Ground Installations  
ASDEV: Asset Development Division  
ATHEX: Athens Exchange Group

---

BOG: Boil-off gases

---

CapEx: Capital expenditure  
CCS: Carbon capture and storage  
CCUS: Carbon Capture, Utilization and Storage  
CEE: Central-East Europe  
CEF: Connecting Europe Facility  
CEO: Chief Executive Officer  
CFO: Chief Financial Officer  
CHP: Combined Heat and Power  
CMS: Competence Management System  
CNG: Compressed Natural Gas  
CRI: Corporate Responsibility Index  
CSR: Corporate Social Responsibility  
CSO: Civil Society Organizations

---

DEFRA: UK Department for Environment, Food and Rural Affairs  
DESFA: National Natural Gas System Operator  
DPAs: Data Processing Agreements  
DSO: Distribution System Operator

---

EC: European Council  
EHB: European Hydrogen Backbone  
EIA: Environmental Impact Assessment  
EIS: Environmental Impact Study  
EL.IN.YA.E.: Hellenic Institute of Occupational Health and Safety  
EMS: Environmental Management System  
EnPIs: Energy Performance Indicators  
ENNOH: European Network of Network Operators for Hydrogen  
ENTSOG: European Network of Transmission System Operators for Gas  
ERM: Enterprise Risk Management  
ESG: Environment, Society, Governance  
ESIA: Environmental and Social Impact Assessment

ESRS: European Sustainability Reporting Standards  
ETA: Environmental Terms Approval  
ETCg: Energy Traders Certification - Gas  
ETS: Emission Targeting System  
EU: European Union  
EUA: EU Allowance (carbon credit)

---

FEED: Front-End Engineering Design  
FID: Final Investment Decision  
FSRU: Floating Storage Regasification Unit  
FSU: Floating Storage Unit  
FTS: System of Fixed Communication

---

GDPR: General Data Protection Regulation  
GfC: Gas for Climate  
GHG: Greenhouse gases  
GIE: Gas Infrastructure Europe  
GRI: Global Reporting Initiative

---

H&S: Health & Safety  
HAEE: Hellenic Association for Energy Economics  
HEnEx: Hellenic Energy Exchange  
HGG: Hellenic Government Gazette  
HI East: Hydrogen Interconnections in Central Eastern and Southeastern Europe  
HPP: West Macedonia High-Pressure Pipeline  
HSE: Health, Safety, Environment  
HSSEQ: Health & Safety, Security, Environment and Quality

---

ICT: Information and Communications Technology  
IENE: Institute of Energy for South-East Europe  
IFRS: International Financial Reporting Standards  
IGNM: Interconnection Greece–North Macedonia  
iOGP: International Association of Oil & Gas Producers  
InSAR: Interferometric Synthetic Aperture Radar  
ISO: International Organization for Standardization  
IT: Information Technology  
IMS: Integrated Management System  
IUCN: International Union for Conservation of Nature

KIPIC: Kuwait Integrated Petroleum Industries Company  
KPIs: Key Performance Indicators  
KYC: Know Your Counterparty

---

LDAR: Leak Detection and Repair  
LNG: Liquefied Natural Gas  
LPG: Liquefied Petroleum Gas  
LTI: Lost Time Incident

---

M/R: Metering Regulating  
MEEN: Ministry of Environment and Energy  
MFA: Multi-Factor Authentication  
MJ: Megajoules  
MM: Monitoring and Metering  
MoC: Memorandum of Cooperation

---

NECP: National Energy and Climate Plan  
NNGS: National Natural Gas System

---

O&M: Operations & Maintenance  
OGMP: Oil & Gas Methane Partnership 2.0  
ORV: Open Rack Vaporizer  
OT: Operational Technology

---

PAM: Privileged Access Management  
PCI: Projects of Common Interest  
PHEVs: Plug-in hybrid electric vehicles  
PMI: Projects of Mutual Interest  
PPE: Personal Protective Equipment  
PPS: Pipeline Protection Strip  
PoC: Proof of Concept

---

QHSE: Quality, Health & Safety and Environmental

---

RAAEEY: Regulatory Authority for Energy, Waste and Water  
RES: Renewable Energy Sources  
RCIS: Risk, Compliance and Information Security  
RoPA: Records of Processing Activities

SAC: Special Areas of Conservation  
SAP: Systems, Applications, and Products in Data Processing  
SASB: Sustainability Accounting Standards Board  
SCADA: Supervisory Control and Data Acquisition  
SCI: Sites of Community Interest  
SCV: Submerged Combustion Vaporizer  
SEP: Stakeholder Engagement Plan  
SEV: Hellenic Federation of Enterprises  
SEEHyC: South-Eastern European Hydrogen Corridor  
SIEM: Security Information and Event Management  
SIGTTO: Society of International Gas Tankers & Technical Operators Ltd  
SMS: Short Message Service  
SPA: Special Protection Areas  
SSLNG: Small-Scale Liquefied Natural Gas  
STEM: Science, Technology, Engineering, and Mathematics

---

TAP: Trans Adriatic Pipeline  
TEN-E: Trans-European Networks for Energy  
TLS: Truck Loading Services  
TSO: Transmission System Operator  
TYDP: Ten-Year Development Plan

---

UN SDGs: United Nations Sustainable Development Goals of the United Nations  
USEPA: US Environmental Protection Agency

---

VIM: Vendor Invoice Management  
VOC: Volatile Organic Compounds

---

WFM: Work Force Management





## DESFA Head Office

357-359 Mesogeion Av., 152 31 Chalandri  
Tel: +30 213 0884000, Fax: +30 210 6749504  
Email: [desfa@desfa.gr](mailto:desfa@desfa.gr)