

# Anticorruption Policy

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## 1. VISION & OBJECTIVE

DESFA pursues its business activity as Greece's natural gas TSO and, precisely because of its mission and pivotal role in the region, undertakes to disseminate ethical principles in every working context, as well as to implement suitable tools aimed to prevent any form of corrupt conduct in the course of relations with public and private entities.

DESFA believes that ethical behaviour is a prerequisite for maintaining the confidence of our employees, shareholders, business partners, stakeholders, as well as the communities we work in. Desfa integrates the ethical and reputational dimension into business decisions and all business activities, considering this as one of the key elements for both efficient management and sustainable growth of the company.

In fact, one of the key factors of DESFA's reputation is the ability to operate with fairness, transparency, honesty and integrity, in compliance with Desfa's Code of Ethics approved by the BoD and the anti-corruption regulations, both national and foreign, that are in place from time to time.

DESFA's present Anti-Corruption Policy is inspired by the principles of integrity, transparency, fairness and professionalism already mentioned in DESFA's Code of Ethics and forms part of the Internal Control System implemented by DESFA.

This Policy aims to identify the risk areas relevant for anticorruption purposes, behaviours to hold and measures to be applied by DESFA in order to fight the risk of corruption, highlighting the roles, responsibilities, principles and behaviours to be observed in the overall framework of corporate affairs to fight corruption. In addition, this Policy means to further increase awareness and to improve responsiveness of DESFA's People to playing an active part in preventing, remediating and reporting possible breaches of anti-corruption rules.

The present Policy is approved by the Board of Directors.

## 2. ANTICORRUPTION LAWS & BEST PRACTICE

Regarding anticorruption purposes, DESFA, DESFA's people and counterparties are subject to the Anti-corruption Laws. However, the relationships with foreigner partners and the possible development abroad of the Company operations require to build an effective anticorruption compliance programme, with reference to applicable Anticorruption Laws and international Best Practices.

DESFA considers the Best Practices as a guidance for the purposes of this Policy and for the development and maintenance of an effective anticorruption compliance programme.

## 3. STATEMENT

In this context, DESFA, in accordance with the Anticorruption Laws and its Code of Ethics, adopts a zero tolerance approach to any form of corruption and plays an active part, both in its business affairs and public standing, in ensuring that, over time, we will truly witness a drastic containment of this phenomenon<sup>1</sup>.

For the purposes of this Policy, means of corruption can be not only money or other economic advantages, but also commercial practices or social activities such as, by way of indication, gifts, entertainment and hospitality expenses, donations, sponsorships. They can equally be met in the form of jobs or investment opportunities, confidential information, discounts or personal credits, assistance or support to family members, as well as any other benefit or consideration capable of unduly influencing a commercial or institutional counterparty in order to derive an undue advantage.

<sup>1</sup> More specifically, DESFA prohibits:

a) active bribery:

The situation whereby person A offers, promises, or provides, directly or through a third party, any kind of unfair benefit to himself or to another, in exchange for an act or omission (future or already completed) which either falls within or contravenes the scope of the duties of person B.

b) passive bribery:

The situation whereby person B seeks, receives or accepts, directly or through a third party, for himself or for another, the promise of an unfair benefit of any nature in return for act or omission (future or already completed) which either falls within or contravenes the scope of the duties of person B.

c) unfair use of influence:

The situation in which person A promises, offers, or provides to a person B, directly or through a third party, for himself or for a third party, a benefit of any nature in return for the exercise of unlawful influence to person C. The benefit is not required to be unfair but aims to an act or omission by person C that falls within the scope of his duties. Unfair use of influence also exists if person B seeks the benefit.

Greek law refers to the concept of "benefit of any kind". Therefore the benefit may be of a material or moral nature.

## 4. SCOPE

The Anticorruption Policy applies to the Management Team, DESFA's people and Private Counterparties.

The personal commitment of all executives and senior managers of DESFA to promoting an anti-corruption culture (top-level commitment) plays a strategic role in disseminating a culture of legality at all levels. The Board of Directors, the Audit Committee and the Management Team express in a clear and unequivocal way, their rejection of any corrupting practice and absolute commitment to the principles of ethics and integrity.

DESFA's People, regardless of their function, position, role or responsibility, need to be conscious that long-term business success can only be achieved if compliance forms an integral part of all corporate activities and business transactions.

This Anticorruption Policy also rules the establishment of relationship with any Private Counterparty which intends to have a business relationship with DESFA and the continuation of their business activities.

## 5. GENERAL PRINCIPLES OF BEHAVIOUR

In view of all the above and for the purposes of compliance with this Policy, DESFA adopts and respects the following general principles of conduct:

- segregation of duties: the person in charge of an operating or financial activity must always be a different person from the person who controls and authorizes it, since the operational and control functions must be adequately segregated;
- exercise of powers: signing powers must be clearly defined and formalized, in consistency with the actual organizational and managerial responsibilities assigned, and all powers must be exercised within the established limits in the organization of the company;
- compliance with the rules and procedures: the company activities must be carried out in accordance with the anti-corruption laws, this Policy and the applicable corporate regulatory instruments on anti-corruption matters;
- traceability and archiving: all company activities and related controls must be adequately traced and the documentation correctly archived;
- "know your Business Associates" principle: all units involved in operations designed to maintain or establish a relationship with any business associates or counterparties must obtain relevant information on them.

## 6. RISK AREAS AND MANAGEMENT

For the purpose of fighting corruption, DESFA identifies certain areas as most sensitive to corruption risks and provides for control principles to be respected, as specifically indicated below.

The interactions that may present a risk of corruption mainly concern certain categories of activities between DESFA and third parties, indicatively: negotiations; payments; disclosure of information and/or documents; liaisons with Public Authorities (licensing, permits, issuance of administrative acts, approvals and positive opinions, responses to requests, inspections).

All DESFA personnel are required to notify to DESFA's Compliance Department any conduct, whether by DESFA or by any third party, that fails to meet the following requirements and principles.

As a general rule, with reference to the activities listed above:

- only the person specifically appointed by DESFA can engage with third parties, with regard to acts, communications, declarations and requests of any kind on behalf of DESFA; interactions with the third party must be adequately documented;
- payments to third parties are only allowed according to executed agreements with DESFA or judiciary decisions or pursuant to provisions of the law or administrative acts, that are binding for DESFA; all payments are effected by bank transfer or electronic means of payment that ensure traceability and archiving and are made by the delegated person, duly and formally invested with such power;
- in the event of a request for information and / or documents from a third party, public or private, a written request must be sent to the specifically delegated person who forwards it to the competent function.

For all interactions relevant under the purpose of this Policy, the delegated person may request the support of the Compliance Department, which assures any potential issues is timely detected and addressed, involving the competent functions and reporting to Legal, Governance and Compliance Division.

In the event of Red Flags, the involvement of the Compliance Department is envisaged for the appropriate checks.

For each of the below sensitive areas, specific corporate instruments are to be developed and periodically updated as the Company's compliance system evolves. These further provisions are meant to be understood as an integral part of the present Policy.

More specifically, the identified risk areas are the following:

### **6.1. Relations with Public Administration and political contributions**

Any form of unofficial payments made to public administration bodies or private entities or intermediaries, in order to speed up, encourage and generally facilitate the performance of their activities are prohibited by DESFA.

In the event of licensing, permits, issuance of administrative acts, opinions, responses to requests, inspections by the Public Administration, the responsible person must comply with specific procedures which ensure:

- information of the hierarchy;
- information of the Legal, Governance and Compliance Division in case of inspection by Public Administration related to administrative, tax or criminal investigation;
- participation of adequate resources;
- traceability of the persons involved and the interaction itself.

DESFA prohibits any form of corporate contribution, direct or indirect, to political parties, movements, committees, political organizations, including their representatives and candidates and even if made in relation to activities carried out abroad and/ or in respect of foreign parties. DESFA People may make such contributions only as private individuals.

### **6.2. Gifts, entertainment expenses and hospitality**

Gifts or other benefits given or received in any circumstance and aimed at maintaining and/or developing relations with third parties are permissible provided that jointly they are:

- not in cash;
- of modest value or, in any case, in good faith and reasonable according to the circumstances;
- objectively unable to exercise improper influence;
- lawful and in compliance with standards of commercial and professional courtesy.

All gifts or other benefits given, accepted or refused by DESFA personnel are to be reported to Compliance Department, using the appropriate form (Annex B).

Especially travel expenses are made in accordance with company procedures in force and reimbursed only if reasonable and in good faith, as well as properly authorized and documented.

Regarding the entertainment expenses incurred by DESFA people, in any circumstance and aimed at maintaining and/or developing relations with third parties, those are permissible accordingly with the criteria provided for above and the authorizations set in Annex C.<sup>2</sup>

### **6.3. Donations, sponsorships & non-profit initiatives**

Non-profit initiatives, donations and sponsorships must be consistent with the corporate values expressed in the Code of Ethics, such as sustainability, protection of the environment, innovation, promotion of the territory where DESFA operates. They are also aimed at promoting DESFA's activities, increasing their visibility and good reputation.

Non-profit initiatives and sponsorships are to be duly authorized in accordance with specific company procedures and they must be traceable and carefully documented, so as to facilitate monitoring.

In any case, beneficiaries of a sponsorship contract should only be:

- individuals who are well known and reliable in terms of honesty and correct business practices;
- entities that satisfy all the requirements to operate in compliance with the applicable laws.

### **6.4. Procurement of works, goods and services**

During the engagement of third parties for the procurement of works, goods and services, both DESFA Personnel and the third parties must comply with the present Policy and the Code of Ethics.

All DESFA Personnel is expected to exercise their duties according to the applicable internal procedures.

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<sup>2</sup> The limits provided in Annex C are meant solely for the purpose of different authorization bodies.



The procurement procedures should provide as minimum requirements:

- precise roles and responsibilities relating to all phases of the award process, from the definition of the request up to the stipulation of the contract;
- proper formalization and authorizations on the basis of the system of delegated powers and proxies in force;
- segregation of roles and responsibilities between those who prepare the request, those who evaluate and award the contract and those who make payments;
- adoption of IT tools in order to ensure secrecy and integrity of offers before the deadlines for submission expire;
- definition of suitable monitoring systems in order to guarantee a normal rotation of contractors.

In addition, DESFA ensures that specific procedures are in place for:

- performance of anti-corruption due diligence during the qualification and award phase of tenders and awards, as well as checks relating to the maintenance of such ethical requirements for the duration of the relationship, with the support of Compliance Department;
- establishment of a vendors' list for the different categories of contracts following a call for expression of interest and an evaluation process according to international best practices;
- the provision for suspension and / or revocation of the qualification in the tender/contract/vendors' list, in the event of eventual lack of specific requirements related to anti-corruption.

Finally, DESFA makes use of contractual standards that contain:

- standard protection clauses, including undertakings of compliance with Anti-Corruption Laws;
- possibility of termination or suspension of the relationship in the event of eventual failure to comply with this Policy, as well as in case of eventual lack of specific anti-corruption requirements;
- commitment by the contractor to indemnify and hold harmless DESFA from any damage due to the effect of eventual lack of specific reputational requirements and / or due to inaccuracy or incompleteness of the information provided.

#### **6.5. Selection, hiring and management of personnel**

The search, selection and hiring process, as well as the career advancement of all DESFA personnel, must take place in compliance with the principles of non-discrimination, impartiality, autonomy and independent judgment.

The implementation of these principles is aimed at ensuring that the final decision involves subjects suitable to fill the open position, who receive an offer consistent with the values of the reference market, thus ensuring equal access to job opportunities.

The selection and hiring process is governed by specific corporate instruments which, inter alia, provide that candidates declare if they have

- any personal relationships with public administration officers or DESFA's counterparties<sup>3</sup>;
- any pending criminal proceedings and / or criminal convictions<sup>4</sup>.

In addition, the remuneration and any additional bonuses shall be consistent with the role and responsibilities and according to the applicable remuneration company policy.

#### **6.6. Business Partnerships, Transactions, Mergers & Acquisitions**

DESFA maintains relationships and enters into contracts only with well-known, reliable subjects and with an excellent reputation for honesty and fair business practices.

Therefore, before starting the collaboration with a third party in the context of operations, such as joint ventures / consortiums, mergers, acquisitions, sales of shares, exchanges, divisions or transfers, DESFA requires that an anti-corruption due diligence activity be carried out on the potential counterparty, with the aim of verifying their background and reputation.

The due diligence is conducted with the support of Compliance Department, according to the methods defined in the respective corporate procedures. DESFA procedures identify roles, responsibilities and operating methods in the management of the above operations.

In addition, the functions engaged in these operations shall identify the main risk factors and Red Flags present in the above transactions, prepare the anti-corruption compliance information that is suited to the potential transaction / partner and then draw up the anti-corruption declarations and guarantees to be included in the sale / purchase / merger or otherwise respective contract

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<sup>3</sup> DESFA employees shall update this declaration in case of any change to the information thereof.

<sup>4</sup> Those personal data are processed only to the extent that are relevant with the purpose pursued by the Company and always in accordance with the principle of proportionality.

### 6.7. Land Acquisition: purchase, sale and lease of real estate

DESFA procedures define processes, roles, responsibilities and operating methods in relation to the sale and purchase of real estate, in order to guarantee transparency and uniformity of conduct of the activities.

The delegated persons work in close coordination with the Compliance Department to perform anti-corruption due diligence on the potential counterparty, in the manner defined by the company procedures in force, to detect possible Red Flags on the transaction and to avoid potential repercussions such as damage to the image of the Company, loss of value, damage to the business operation.

### 6.8. Accounting procedures

Adequate accounting controls are implemented to provide guarantees so that accounting operations are performed only against a general or special authorization from management and are always adequately recorded to allow:

- preparation of the financial statements, in accordance with the accounting principles, which are reviewed by the Audit Committee
- independent statutory audit process by external auditors
- correct accounting of all company assets;
- access to accounting of company assets only with a management authorization;
- comparison of the values of the company assets on the balance sheet with those actually existing

Therefore, DESFA's accounting records must:

- comply with accounting principles;
- be detailed and complete;
- reflect transparently all the phases of each type of transaction and expenditure, whether significant or not from an accounting point of view.

## 7. TRAINING, INFORMATION, CONTROL & MONITORING

### 7.1. Training and Information of Desfa People

DESFA People are informed and trained on the contents of the Anticorruption Laws and this Policy and the corporate anticorruption instruments, as well as on the importance of respect and proper use of the means aimed at preventing corruption.

All DESFA People are required to attend a mandatory anti-corruption training program and the related periodical updates.

The Compliance Department is responsible to provide the proper contents to the Human Resources Division in order to perform the training sessions, and support the development of the relevant courses.

In particular, within the training and information activity, the Compliance Department promotes and supervises the spread of an ethical culture, by making Desfa People be aware of:

- all offences, risks, personal and administrative responsibilities deriving from the violation of Anticorruption Laws;
- the importance to adopt behaviours to prevent and fight corruption, within their activities;
- all applicable sanctions and possible responsibilities, as well as actions that could be taken by the Company, in case Anticorruption Laws, this Policy or any corporate relevant instruments is violated.

### 7.2. Risk assessment, monitoring and continuous improvements

Periodic checks on the respect, effectiveness and adequacy of the design of this Policy and in the corporate anti-corruption instruments are carried out by DESFA's Internal Audit Department, in the perspective of the implementation and continuous improvement of a proper anticorruption compliance programme.

The Compliance Department carries out a yearly risk assessment and monitoring activity in order to analyse the state of adoption of this Policy, its transposition into corporate instruments on anti-corruption and the general awareness of Desfa's people. The activity is finalized by reviewing this Policy and other corporate anti-corruption regulatory instruments, to ensure its effectiveness over time and compliance with Best Practices.

In particular, the Compliance Department proposes any updates and improvements:

- following changes in the Anticorruption Laws;
- on the occasion of changes in Desfa's organizational structure or business sectors;
- based on the results of the checks carried out by the Internal Audit Department.
- in any other case where improvements to this Policy are recommended, indicatively on the basis of emerging Best Practices
- in the event that gaps or violations are identified by the Ethics Committee after a whistleblowing report.

<sup>3</sup> Οι υπάλληλοι του ΔΕΣΦΑ πρέπει να ενημερώνουν αυτή τη δήλωση αν επέλθει μεταβολή στις πληροφορίες που περιέχει.

<sup>4</sup> Αυτά τα προσωπικά δεδομένα υπόκεινται σε επεξεργασία μόνο στον βαθμό που σχετίζονται με τον σκοπό της Εταιρείας και πάντοτε σύμφωνα με την αρχή τη αναλογικότητας.

All the corporate functions involved in the risk areas described above are responsible, as far as they are concerned, for detecting occasions that involve / may entail the need to adapt this Policy and the corporate anti-corruption instruments, and for notifying the Compliance Department.

The amendments and updates to the present Policy are approved by the Board of Directors based on the proposal of the Compliance Department<sup>5</sup>.

The Compliance Department submits an annual report on its activities to the Ethics Committee and to the CEO.

### 7.3 Notifications

Any violation, suspected or known, of the Anticorruption Laws, of this Policy and of the corporate anticorruption instruments falls under the scope of the Whistleblowing Policy and must be immediately notified to the Internal Audit Department through the following communication channels:

- e-mail box - tell.us@desfa.gr
- voicemail (also accessible from abroad) +30 210 6520542
- post office box no 80, ELTA Ag. Paraskevis, 8 Ag. Ioannou str.

Management and assessment of the reports guarantee the confidentiality of the reporting person's identity, in accordance with the Company's Whistleblowing Policy.

In any case, Desfa People will not undergo any retaliatory action (disciplinary sanctions, demotion, suspension, dismissal, etc.) nor will they be in any way discriminated against in the working treatment, following reports made in good faith of occurred or alleged violations of this Policy and of the Company's instruments on anticorruption.

### 7.4. Sanctioning measures and contractual clauses

Any violation of the Anticorruption Laws, this Policy and the Company's anti-corruption instruments by Desfa People may constitute a breach of the obligations deriving from the employment relationship and a possible disciplinary offense.

Private Counterparties who engage in conduct contrary to the Anticorruption Laws and this Policy will be subject to contractual remedies (provided for in specific clauses) and, in the most serious cases, will be prohibited from having commercial relations with Desfa and will be subject to claims for compensation for any Desfa's damages.

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<sup>5</sup> Particularly definitions, footnotes and the annex of the present Policy can be amended by the Compliance Department, informing the Board of Directors.



## Annex: Definitions

For the purpose of this Policy, the following terms have the definition assigned to them:

**“Anticorruption Laws”** include national legislation relevant to anti-corruption (Greek Criminal Code art. 159-159A, on bribery of political officials, 235-236 on bribery of public sector employees, 237 on bribery of members of the judiciary, 237A on influence trading and intermediaries, 237B on bribery in the private sector, Law 3023/2002, Law 4622/2019 Part D Chapter C, as may be updated accordingly) as well as International conventions ratified under Greek Law: (i) the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (Paris, 1997), (ii) Criminal Law Convention on Corruption (Council of Europe, Strasbourg, 1999), (iii) United Nations Convention Against Corruption (Merida, 2003), (iv) Civil Law Convention on Corruption by the Council of Europe (1999).

### **“Best Practices”**

- U.S.A. Foreign Corrupt Practices Act (FCPA)
- U.S.A. Federal Sentencing Guidelines for Organizations (FSGO): Compliance and Ethics Program
- UK Bribery Act 2010
- Adequate Procedures – Guidance to the UK Bribery Act 2010
- United Nation Global Compact 10<sup>th</sup> Principle

**“Desfa People / Desfa’s People”** includes DESFA’s personnel and any other person who is acting, for any reason and regardless of the type of contractual relationship, in the name and/or on behalf of DESFA, within the scope of their duties and responsibilities.

**“Ethics Committee”** is the supervisory body composed of the Head of Legal Division, the Head of Enterprise Risk Management and Internal Audit Division and the Head of Human Resources Division.

**“Internal Control System”** is all the necessary or useful tools to address, manage and check activities in the Company, aimed at

- ensuring compliance with corporate laws and procedures
- protecting corporate assets, efficiently managing activities
- providing precise and complete accounting and financial information;

**“Management Team”** includes Desfa People who carry out the administration, representation and/or management functions of DESFA.

**“Private Counterparties”** includes suppliers, contractors, subcontractors and sub suppliers, providers,

consultants, business partners, and in general any private counterparty with which DESFA is engaged in commercial relations or partnerships for any reason.

**“Public Administration”** includes all public institutions, organizations, undertakings, regional and local administrations and independent authorities, in Greece or abroad, as well as, in general, all those subjects appointed, directly or indirectly, to care for a public interest or whose representatives can be qualified as public officials or persons in public service.

**“Red Flags”** includes any critical issues that may arise bearing the risk of corruption.



# ANNEX B)

## GIFTS & OTHER BENEFITS REGISTRATION FORM

To the kind attention of the Compliance Manager

I hereby communicate that I have received / given / refused the following as a gift:

**Receiving/giving/refusing party:** "name, company and department of the receiving/donating/refusing party"

**SENDER/RECIPIENT:** "indicate the sender/recipient of the gift as the case may be"

**SUBJECT:** "indicate the type of gift received/given"

**DESCRIPTION:** "insert a brief description of the gift received/given"

**ESTIMATED VALUE:** "indicate an economic estimate of the value of the gift received/given"

**CONFORMITY:** "indicate if what was received/given is acceptable with respect to the criteria expressed in the Anticorruption Policy and, if not, why"

**DATE AND PLACE OF RECEIPT:** "indicate the date and place where the gift was received/given"

**Date and place**

**SIGNATURE SUBJECT RECEIVER / GIVER / REFUSER (if he is a Desfa person)**

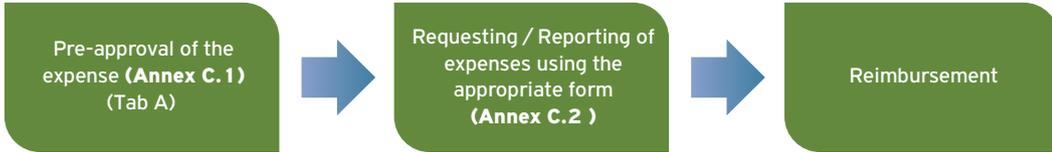
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# ANNEX C.1)

## Entertainment expenses

The entertainment expenses of attention to third parties (e.g. lunches or dinners, travel, hospitality and entertainment), individually incurred by the People of Desfa and aimed at maintaining and developing relations with third parties not belonging to Desfa, in the context of carrying out the activities for which they are responsible, can indicate corrupt behavior, if not reasonable and not carried out in good faith.

These expenses must meet the criteria of the Anticorruption Policy and follow the procedure indicated below:



If the authorization cannot be requested in advance for valid and objective reasons of urgency or operational impossibility, the signing of the report by the authorized position will be valid as authorization.

Attention costs towards third parties can be authorized by the positions identified in Table A, in compliance with the segregation rules and internal control principles, and in any case shall be in compliance with the criteria set out in the present Policy.

The same beneficiary cannot incur expenses that cumulatively exceed the figure of 1 500 euros per year.



**Table A**

Company	Person who sustains the expense	Approver	Amount
	CEO	CEO	Any amount
	Division Director	CEO	Any amount
	Manager	Division Director	150 per beneficial

# ANNEX C.2

## APPLICATION FORM FOR THE AUTHORIZATION FOR EXPENSES TO THIRD PARTIES

Company _____			Date _____
Name of the Applicant*  _____ _____	Personnel Number ID.*  _____ TITLE* _____	Departement*  _____ Cost Center* _____	Off site job <input type="checkbox"/>
Name / function of the persons / companies for whom the expenses are intended*		Place*	Date*
_____ _____ _____ _____		_____ _____ _____ _____	
Nature of the Expense*			
_____ _____ _____ _____			
Applicant*  _____		Approver*  _____	

• **required field.**

• The present form should be delivered jointly with the ANNEX C) Ter.

# ANNEX C.3

## REPORT FOR ENTERTAINMENT EXPENSES TO THIRD PARTIES

<b>Company</b> _____			<b>Date</b> _____
<b>Name of the Applicant*</b>  _____ _____	<b>Personnel Number ID.*</b>  _____ <b>TITLE*</b>  _____	<b>Departement*</b>  _____ <b>Cost Center*</b>	<b>Offsite job</b> <input type="checkbox"/>
<b>Name / function of the persons / companies for whom the expenses are intended*</b>  _____ _____ _____		<b>Place*</b>  _____ _____ _____	<b>Date*</b>
<b>Applicant*</b>	<b>Date*</b>	<b>Amount (€)</b>	<b>Amount in foreign currency</b>  _____
		<b>TOTAL</b> _____	<b>TOTAL</b> _____
<b>NOTES:</b>  _____ _____ _____			
<b>Applicant*</b>  _____		<b>Approver*</b>  _____	

• Required field



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