

# Transparency Report 2025

Information for the fiscal year  
01/07/2024 - 30/06/2025

October 2025



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## **Our Company is moving ahead with a clear focus towards 2030, seeking to shape a sustainable and evolving business future centered on innovation and trust.**

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I am proud to present the Transparency Report of Grant Thornton Greece for the year ended as at 30/06/2025. The Report is published on an annual basis in compliance with the regulatory provisions for corporate governance and transparency, as set out in Article 13 of Regulation (EU) 537/2014.

The Board of Directors of Grant Thornton approved this Transparency Report for the year ended as at 30/06/2025, on October 30, 2025.

The year 2025 further emphasized the need for flexibility, technological readiness, and human-centered thinking in an environment full of uncertainties yet also opportunities. For Grant Thornton, adaptation is not merely a reaction to circumstances; it is a strategic choice. Our Company is moving ahead with a clear focus towards 2030, seeking to shape a sustainable and evolving business future centered on innovation and trust.

Transparency and accountability are the cornerstones of our philosophy and permeate every aspect of our operations. In practice, this translates into services that combine expertise, integrity, and innovation. By strengthening our processes continuously, we foster a modern, sustainable business environment in which these values guarantee reliability and trust to our partners, our people, and society as a whole.

In this context, the significance of our technology strategy becomes clear. The establishment of the AI Center of Excellence in 2024 was a pivotal step in developing artificial intelligence solutions to strengthen the digital transformation of Greek businesses. By collaborating with technology partners, startups, and academic institutions, the AI Center of Excellence is setting a standard for the responsible use of AI, promoting transparency, innovation, and competitiveness.

At the same time, we invest in public debates about technological progress and social change through institutions like Future Unfold. In 2024, the presence of Greek Prime Minister Kyriakos Mitsotakis in the event highlighted the importance of the institution and our responsibility to strengthen the national digital transformation strategy. Future Unfold has now become a platform for meaningful dialogue between businesses, academia, and the state regarding the technological and social developments shaping tomorrow's Greece.

Our commitment to continuous progress is reflected primarily in our people. In 2025, Grant Thornton was named "Best Workplace" in Greece for the first time. This recognition confirms our ongoing investment in policies that promote well-being, equality, and development. It also affirms our commitment to taking action to improve the quality of life for our employees.

We continue to implement initiatives such as the four-day workweek, a hybrid work model, and practices that support physical and mental health. Certifications such as "Great Place to Work", the SHARE Equality Label, and the "Best Workplaces™ for Women Hellas" distinction demonstrate our commitment to an inclusive, people-centered culture free of exclusion and discrimination.

This year's Report reflects our actions and policies not as an account of the past, but as a commitment to the future. We are building a future based on expertise, innovation, and responsibility. We continue to evolve, collaborate, and create long-term value for our partners, society, and the economy.

At Grant Thornton, we don't just predict the future. We actively shape it.

# Legal Structure & Shareholders

## Legal Structure

Grant Thornton Greece ("Grant Thornton") was established in 1994, under the title "Efthinos S.A. Chartered Accountants". Its legal structure is that of Société Anonyme and its full name is "Grant Thornton S.A. Chartered Accountants Management Consultants". Since July 2012 and following a restructuring of Grant Thornton Greece, a subsidiary company - under the title "Grant Thornton Tax & Consulting Services Société Anonyme" was established.

The Headquarters of both entities are located at Katehaki Ave 58 - PC 11525.

## Memberships

Grant Thornton is registered under Reg. Num. 127 in the Institute of Certified Public Accountants of Greece (SOEL) and in the Public Company Accounting Oversight Board (PCAOB). The PCAOB is a non-profit corporation, created by Sarbanes-Oxley Act of 2002, to oversee the auditors of public companies in order to protect the interests of investors and further public interest. The registration with the PCAOB enables Grant Thornton to participate in the conduct of audits in American Stock Exchanges.

## Ownership Structure

The firm's shares are mandatory nominal and blocked as a total.

Following the decision of the General Meeting, made by absolute majority as in compliance with Article 13 of the Company's Articles of Association, it is allowed to grant preference over existing or newly issued shares.

The preference refers to the exclusive participation in profits emerging from corporate activity related to the services provided by the shareholders holding these preference shares, without them having any participation rights in profits caused from corporate activity of other (common) shareholders.

The above decision of the General Meeting on granting preference, shall, under invalidity penalty, include the following:

- (a) Information on preference shareholders
- (b) Exact definition of profits, pertaining to the preference.

The definition of profits per corporate operation arises from the Company's detailed accounting system, while the distribution of Company expenses per category of shares (common or preferred) is conducted in compliance with Article 9 par. 2 of the Company's Articles of Association.

The Company's shareholders, that as a total are Certified Public Accountants (CPAs), members of the Institute of Certified Public Accountants of Greece, are presented as follows:

### Common Stocks

KAZAS V. KONSTANTINOS  
DELIGIANNIS N. GEORGE  
CONSTANTINOU A. SOTIRIOS  
ARABATZI M. ATHANASIA  
LEONIDOU CH. ELPIDA  
MELAS G. DIMITRIOS  
MICHALIOS G. EMMANOUIL  
MOUSTAKI K. ATHINA  
IOANNOU V. NIKOLAOS  
CHRISTOPOULOS D. PANAGIOTIS DIAMANTOULAKIS N.  
EMMANOUIL  
KANAKARAKIS E. KONSTANTINOS  
ANTONAKAKIS E. KONSTANTINOS  
GARBIS D. NIKOLAOS  
DOUVRIS TH. DIMITRIOS  
PAGONI K. DIMITRA  
XYNAS G. ATHANASIOS  
TSIRONI G. CHRISTINA

NOULAS I. PANAGIOTIS  
KAZA V. PELAGIA  
MANTZOUNIS A. NIKOLAOS-CHRISTOS GERASIMOPOULOU G.  
ATHANASIA  
KAZAS V. KONSTANTINOS  
VARGIEMEZIS A. CHRISTOS  
GKIOUMES I. PANAGIOTIS  
NTETSIKAS K. STERGIOS PANAGOPOULOS P. GEORGIOS  
PANTERLIS S. DIMITRIOS  
STEFANIDOU A. AIKATERINI  
FILIPPOUSI N. ELENI  
KOTITSA N. MARIA-DIMITRA  
KONSTANTINOU S. ANDREAS

### Preference Shares

PAPAGIANNOPoulos P. KYPRIANOS  
CHRYSANTHOPOULOU K. MARINA

Certified auditors, non-shareholders, or non-partners, entitled to signature rights on behalf of the Company, are as follows:

- Athanasatou A. Ioanna, R. N. 56621
- Anagnostakis Ch. Ioannis, R. N. 75501
- Andritsopoulos D. Alexandros, R. N. 62741
- Andronis F. Stavros, R. N. 59581
- Apostolopoulos D. Spyridon, R. N. 30221
- Asvesti V. Katerina, R. N. 32911
- Asimakopoulos Ch. Panagiotis, R. N. 68251
- Vardalachaki Ch. Marina, R. N. 33871
- Varsamidis V. Savvas, R. N. 66631
- Variti I. Eleftheria, R. N. 65731
- Vellios D. Aggelos, R. N. 68041
- Geroudis P. Emmanouil, R. N. 49361
- Georgiadis N. Ioannis, R. N. 36851
- Deligiannidis Ch. Ananias, R.N. 52881
- Dimitriou D. George, R. N. 70171
- Diamantoulaki E. Evangelia, R. N. 54731
- Dovridis G. Aris, R. N. 62291
- Drakopoulou K. Maria R. N. 58711
- Zafiris D. Panagiotis R. N. 35571
- Zouros A. Georgios, R. N. 29271
- Zervaki E. Evaggelia, R. N. 45621
- Ioannou V. Andreas, R.N. 48821
- Kavoukas K. Dimitrios, R. N. 33951
- Kamas I. Michail, R. N. 76421
- Kapnidou A. Christina, R. N. 59471
- Karagiannakis G. Emmanouil, R. N. 61401
- Karagiorgou P. Agoritsa, R. N. 48021
- Kardiopoulos G. Michail, R. N. 74041
- Kasioumis G. Aggelos, R. N. 66541
- Katachanaki A. Anna, R. N. 30401
- Kollias K. Nikolaos, R. N. 70801
- Kontaki A. Aspasia, R. N. 63341
- Kourinou M. Anna-Maria, R. N. 63421
- Kourti D. Athanasia, R. N. 52251
- Koutsopoulos Th. Eleftherios, R. N. 44651
- Kirkos P. Stefanos, R. N. 69711
- Latsis S. Nikolaos, R. N. 63571
- Lavrentakis I. Konstantinos, R. N. 55901
- Lianidaki I. Chrysa, R. N. 29561
- Madimenos P. Charalampos, R. N. 55961
- Mathioudaki G. Antonia, R. N. 66071
- Makopoulos N. Dimitris, R. N. 54921
- Mania E. Maria, R. N. 44731
- Maniadi K. Maria, R. N. 34021
- Mantis N. Christos, R. N. 75851
- Mentzakis E. Emmanouil, R. N. 39351
- Minogiannis G. Theodoros, R. N. 41381
- Balafoutis V. Georgios, R. N. 43361
- Basmanos D. Andreas, R. N. 61011
- Bizimis Ch. Nikolaos, R. N. 37861
- Bouzanis-Velikopoulos D., R.N. 66171
- Braimi D. Olga, R. N. 53331
- Natsis D. Spiros, R. N. 69871
- Xenidis D. Vasileios, R. N. 36441
- Xenofou L. Dimitra, R. N. 61051
- Padiotis E. Spyridon, R.N. 52311
- Papakonstantinou N. Maria, R. N. 69911
- Paraskeva A. Katerina, R. N. 64111
- Paraskevopoulou G. Theodora, R. N. 51841
- Pardalis A. Andreas, R. N. 58521
- Petroulaki I. Ioanna, R. N. 40831
- Plevraki E. Eleni, R. N. 60291
- Politis N. Athanasios, R. N. 71201

- Sakkas K. George, R. N. 54331
- Santis D. George, R. N. 55171
- Sarakostidis S. Prodromos, R. N. 62511
- Serafimidis G. Stavros, R. N. 34171
- Sifnaios N. Grigoris, R. N. 43751
- Skarkalas G. Ioannis, R. N. 64731
- Sofis Ch. Andreas, R. N. 47771
- Spiridakis E. Christos R. N. 67381
- Stereopoulou S. Eleni, R. N. 42221
- Tzavaras S. Christos, R. N. 58111
- Tziokas Ch. Thalis, R. N. 48431
- Tsakalakis I. Georgios, R. N. 47461
- Tsakanikas L. Alexandros, R. N. 48641
- Tselios E. Dimitrios, R. N. 36651
- Tsipa V. Vasiliki, R. N. 58201
- Tsirimbas D. Vasiliki, R. N. 48461
- Filippa S. Souzana, R. N. 52691
- Photou A. Vasilis, R. N. 60461
- Chilakos D. Filippos, R. N. 45361
- Chouliaras A. Fotis, R. N. 58281
- Psomiadou E. Ioanna, R. N. 72161

## Our range of services

### Service lines

- Assurance
  - Financial Reporting Services
  - Environmental, Social, Governance, Risk & Compliance Services (ESGRC)
- Advisory
  - Deals
  - Strategy & Investments
  - Technology
- Tax & BPO
  - Tax
  - Business Process Outsourcing

### Industries

- Financial Services
- Energy
- Public Sector

## Other Information

The firm holds offices in five of largest cities of Greece: Athens (58 Katehaki Av., Athens), Thessaloniki (87, 17 Noemvriou, Pylaia, Thessaloniki, 55534), Heraklion, Crete (121 Ethn. Antistaseos & Tenedou, 71306 & VI.PE.,A, 71408), Ioannina (65-67 Dodonis Av.) and Rhodes (1 Stefanou Kazouli & Konstantinou Tsatsou, Rhodes, 85100).

As at the publication date, its headcount amounts approximately to 1.404 persons (August 2025) and for the period 01/07/2024 - 30/06/2025, Grant Thornton Greece turnover amounted to €83,5 million.

# Certifications by credited Bodies

## We are a Best Workplace

Grant Thornton has been distinguished as one of the Top 10 Best Workplaces in Greece for the first time!

Following the assessment conducted by Great Place to Work® Hellas, executives participated in a survey to share their insights. In 2025, we were delighted to be recognized for the first time as "Best Workplaces Hellas 2025"; in the category of companies with 1.000-2.000 employees, as well as "Best Workplace in Professional Services & Consulting Hellas". This recognition is a testament to our commitment to fostering a positive and productive work environment.



## Great Place to Work® (2022, 2023 & 2024)

Grant Thornton has been awarded the Great Place to Work® certification for three consecutive years, following the assessment conducted by Great Place to Work® Hellas and through a survey in which the Company's employees participated by sharing their experience of our working environment.



## Best Workplace for Women (2023, 2024 & 2025)

Grant Thornton has been listed as one of ten Best Workplaces for Women Hellas 2023, 2024 & 2025. This certification underscores the Company's commitment to fostering a contemporary work environment that ensures equitable opportunities for all employees, without any form of discrimination or exclusion.



## Diversity Award Winner

Grant Thornton Greece stood out and received the "Diversity Award" at the Grant Thornton International 'Go Beyond' Awards 2022, the Grant Thornton Global Network Awards. These awards recognize the achievements of the member firms that have undertaken initiatives and conducted actions to promote the global 'Go Beyond' strategy. The nominations were evaluated by GTIL's Global Leadership Team.



## SHARE Equality Label

Grant Thornton is one of the 18 companies in Greece to receive SHARE Equality Label, which recognizes the active promotion of practices and initiatives towards gender equality. Grant Thornton's successful response to the evaluation criteria set by the Independent Evaluation Committee demonstrates in practice that the Company remains true to its commitment of providing a working environment of equal opportunities and remuneration for its people. The SHARE Equality Label is implemented by the General Secretariat for Family Policy and Gender Equality, the Research Centre for Gender Equality (KETHI) and Women On Top, an organization for the professional empowerment of women.



## Health & Safety 2022

Grant Thornton was featured in the 'Health & Safety Awards 2022' ceremony for providing guidance and support to employees to help them improve their daily lives, focusing on their physical and mental well-being, and generally creating a pleasant and safe working environment.



These awards are of particular importance to us because they are based on our employees' performance and reflect their commitment and support for our strategies. Our people are always at the center of our activities. Through their suggestions and ideas, we work together to create the working environment of tomorrow, fulfilling our promise to: "Go Beyond. Move forward together."

# Grant Thornton International Ltd.

Grant Thornton Greece has been a member firm of Grant Thornton International Ltd (GTIL) since 1998 and has all the rights and obligations arising from this relationship.

Grant Thornton International Limited (GTIL) is one of the world's leading organizations of independent member firms that provide assurance, tax, and advisory services. The network member firms, through a wide range of services, provide services to listed and non-listed entities as well as public sector entities. Over 76.000 people, across around 150 member firms, share a common objective of creating a distinctive market identity through rendering high value-added services.

GTIL is a non-profit international organization and does not deliver services in its own name or in any other way. It is an entity organized as a limited liability private company, without incorporating shares from England and Wales in its share capital. The objective of GTIL is to facilitate its member firms to provide high quality services, in order to most effectively meet the needs of the current and potential clients in their main markets.

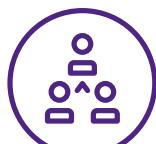
## Fast Facts\*



More than  
**76.000** people



**\$8 bn.**  
turnover 2024



More than **150**  
member firms  
around the world



**22 IBCs**  
(International  
Business Centres)

\* More information is available at the official website of Grant Thornton International Ltd: [www.grantthornton.global](http://www.grantthornton.global)

## Member Firms

Each GTIL member firm is a separate entity. The member firms are not part of the international partnership or otherwise legal partners with each other, nor is each of them responsible for the services or activities of the other. Each member firm has autonomous management and handles its administrative matters on a local basis. Many of the member firms use the Grant Thornton name, either exclusively or incorporated into their national practice names.

Member firms are under obligation to comply with the intensive quality and other reviews carried out by GTIL to ensure that member firms adopt common policies and methodologies. All employees of the member firms are not allowed to hold any direct or indirect interest that would violate the professional and GTIL principles of independence.



# Governance and management structure of GTIL

The current governance and management structure of GTIL is designed to enhance global quality, cohesiveness, and consistency.

## Board of Governors

The Board of Governors (BoG) is the principal and overriding authority in GTIL. The BoG executives are elected from the member firms of the global network and manage the organization on their behalf.

The BoG comprises the Chief Executive Officer (CEO) of GTIL, Chief Executive Officers of the largest Grant Thornton member firms and Chief Executive Officers elected from other Grant Thornton member firms that are not among the largest. The Board aims for a reasonable balance of representation from different geographical areas, including emerging markets. The Board's responsibilities include:

- approving global strategic direction and policies of the network
- overseeing the implementation of the global strategy
- overseeing member firms' matters, (including approving new member firms, suspending the rights of a member firm, or expelling a member firm)
- appointing and setting the remuneration of the chair of the Board
- appointing, evaluating performance and setting the remuneration of the CEO
- approving the budget and member firms' fees
- overseeing the financial health of GTIL
- overseeing global enterprise risk management
- overseeing general governance matters, such as the composition and performance of the Board
- overseeing technology and innovation strategy

## GTIL BoD Members (March 31, 2025)

- Peter Bodin, CEO
- Martin Geh, Chair and independent
- Nathalie Boyer, Canada
- Slavco Filipcev, North Macedonia
- Ramón Galcerán, Spain
- Malcolm Gomersall, United Kingdom
- Said Jahani, Australia
- Denise Koopmans, independent
- Kevin Ladner, Canada (observer)
- Li Huiqi, China
- Daniel Maranhão, Brazil
- Ron Messenger, United States
- Adam Nicol, France
- Jim Peko, United States
- Stephen Tennant, Ireland Florence Tondu-Melique, independent

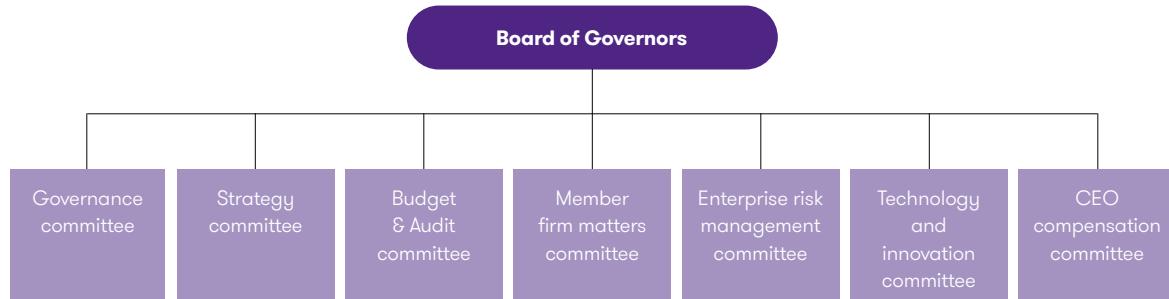
## Chair of the Board

The Chair of the Board (the chair) is a proactive role with a focus on ensuring that the Board functions as a coordinated group in support of the CEO.

Martin Geh has been appointed to the position of the chair, effective January 1, 2025, succeeding Judith Sprieser, who served as the chair from January 1, 2020, to December 31, 2024, when her term of office came to an end.

Martin serves as an independent chairman of GTIL, playing a crucial role in creating the conditions necessary for a highly effective board whose primary focus is on global strategic development.

## Structure of the Board of Governors



## Independent Board members

Independent Board members bring a valuable business perspective to the deliberations of the Board, add to the network's profile, and increase Board transparency.

Independent Board members support the network's public interest responsibilities and its attitude towards quality, risk management and governance, as well as the network's effectiveness in executing its strategic goals and improving the market position. GTIL has processes in place to ensure that the appointment of independent Board members and their ongoing services are compliant with relevant independence rules.

GTIL now has two independent members of the Board of Governors, out of three which is the maximum number allowed, based on our government documents.

## Standing Committees

There are seven standing committees with authority and powers for certain matters as delegated to them by the Board:

**Governance committee (GC):** ensures efficient and effective operation and oversight of GTIL's leadership structures and performance.

**Strategy committee (SC):** advises on the development, alignment and execution of the global strategy.

**Budget and audit committee (BAC):** oversees the GTIL budget and audit processes to ensure the successful execution of the global strategy and adherence to the fiduciary responsibilities of GTIL.

**Member firm matters committee (MFMC):** considers and determines resolution of recommendations made by the global leadership team (GLT) relating to member firm matters. Considerations include member firm terminations, complaint handling and proposed changes to the rules and agreements that materially affect member firms.

**Enterprise risk management committee (ERMC):** has oversight responsibility for ensuring an appropriate enterprise risk management framework is maintained for GTIL and its member firms.

**Technology and innovation committee (TIC):** governs and oversees Grant Thornton's global technology and innovation strategy and ensures that global technology and innovation projects are aligned with Grant Thornton's commercial objectives.

**CEO compensation committee (CEOCC):** executes the Board's responsibilities relating to the annual performance evaluation and related compensation of the CEO, the adoption of policies that govern the CEO's compensation and performance, and the oversight of plans for CEO development. Standing committees allow a more efficient and effective discharge of the Board's responsibilities and involve others in the activities of the Board. Each standing committee is chaired by a Board member and its membership includes, but is not limited to, Board members.



## Global Chief Executive Officer

The CEO is appointed by the Board for an initial term of up to five years, renewable once for a further period of up to three years.

In 2017, the Board appointed Peter Bodin, formerly the CEO of the Swedish member firm, to be the GTIL CEO for a term of five years, as of January 1, 2018, and was reappointed to extend his term until December 31, 2025. As of January 1, 2026, Peter Bodin will be succeeded by Greg Keith, CEO of the Australian member firm. Greg Keith will be the first Chief Executive Officer from an Asia-Pacific (APAC) member firm to serve as Global Chief Executive Officer.

The CEO is responsible for the leadership of GTIL. The role of the CEO includes the development and recommendation of global strategic priorities for ratification by the Board, together with overseeing execution of these priorities. The CEO is responsible for appointing the Global Leadership Team (GLT), subject to the concurrence of the Board. The GLT assists the CEO in the execution of the global strategy. The CEO works closely with the GLT in maintaining global policies and procedures, including those governing international work for the assurance, tax, and advisory service lines.

## Global Leadership Team (GLT)

The GLT develops and drives the execution of the global strategy and is chaired by the CEO. It is a full-time management group dedicated to leading the global organization in the successful execution of the strategy. In addition to providing guidance on the services offered and

- business development, GLT members also have
- operational and regional responsibilities.

The following diagram depicts these responsibilities as at June 30, 2025.

A critical role of the GLT is to work with member firms in driving the execution of the GTIL global strategy. Our vision is to be known as the leading business adviser to dynamic organizations by unlocking the potential for growth in our people, our clients, and our communities.

We care about providing quality services to our clients, contributing to society and treating our people with respect. Our goal is to use our work and influence to inspire confidence, trust and integrity in the markets where we operate. We help create commercial and social environments that enable long-term business success and growth and human prosperity. Our actions stem from our commitment to shaping a vibrant economy.

## Our global strategy for 2025 is focused on Go Beyond with:



Strategic capabilities

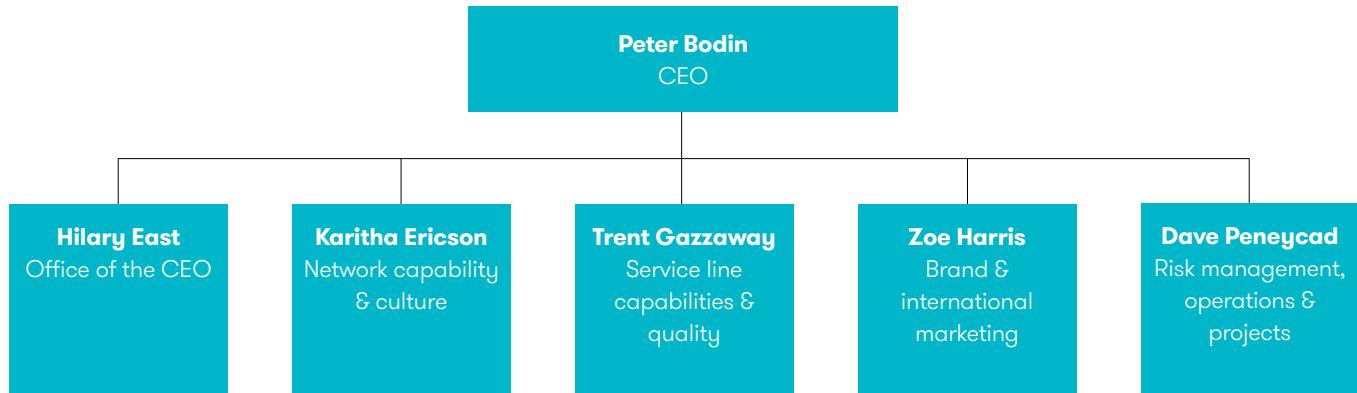


Risk management and quality



Culture

## Global leadership structure



# Corporate Governance

Within the year under review 01/07/2024-30/06/2025, Grant Thornton Greece continued its course, fully applying the principles of corporate governance in compliance with GTIL's high professional standards and, more generally, with international best practices, under which the Internal Regulations have been set.

## General principles of the Company's management

The Company's multi-stock structure is its distinctive feature.

The Company's objective is the creation of relations between the shareholders (partners) based on the triptych of trust, meritocracy, and security.

The Company is managed by three mutually dependent bodies that are responsible for supervisory, auditing, managerial and executive operations of the Management.

These bodies are:

- General Assembly of Partners (Partners Meeting)
- Board of Directors
- Management Committee

Grant Thornton's management principles, which are communicated to all Company members, are outlined in the Company's Articles of Association and Internal Regulations.

## Internal Regulations

In line with corporate governance principles, Grant Thornton has adopted Internal Regulations, which aim to regulate the Company's organization and operation in order to ensure:

- (a) business perfection
- (b) transparency of business operation
- (c) control over management and, in particular, control over managerial decision making
- (d) observance of the legislation and, in particular, of the obligations foreseen by the legislation as far as audit firms are concerned

The Internal Regulations arrange the organization and operation procedures of the Company, in particular:

- (a) The structuring of the Company's organizational structure
- (b) The description of all Company's departments
- (c) All policies applied by the Company. Indicatively, the Company has established, among others, recruitment and evaluation policies for executives, Quality & Risk Management policies, principles and regulations for the prevention and combating of money laundering and terrorist financing (AML/CFT), IT policies, etc.

## Organizational structure

The Company is divided into two (2) organizational units, each with a clear and specific purpose.

These units are:

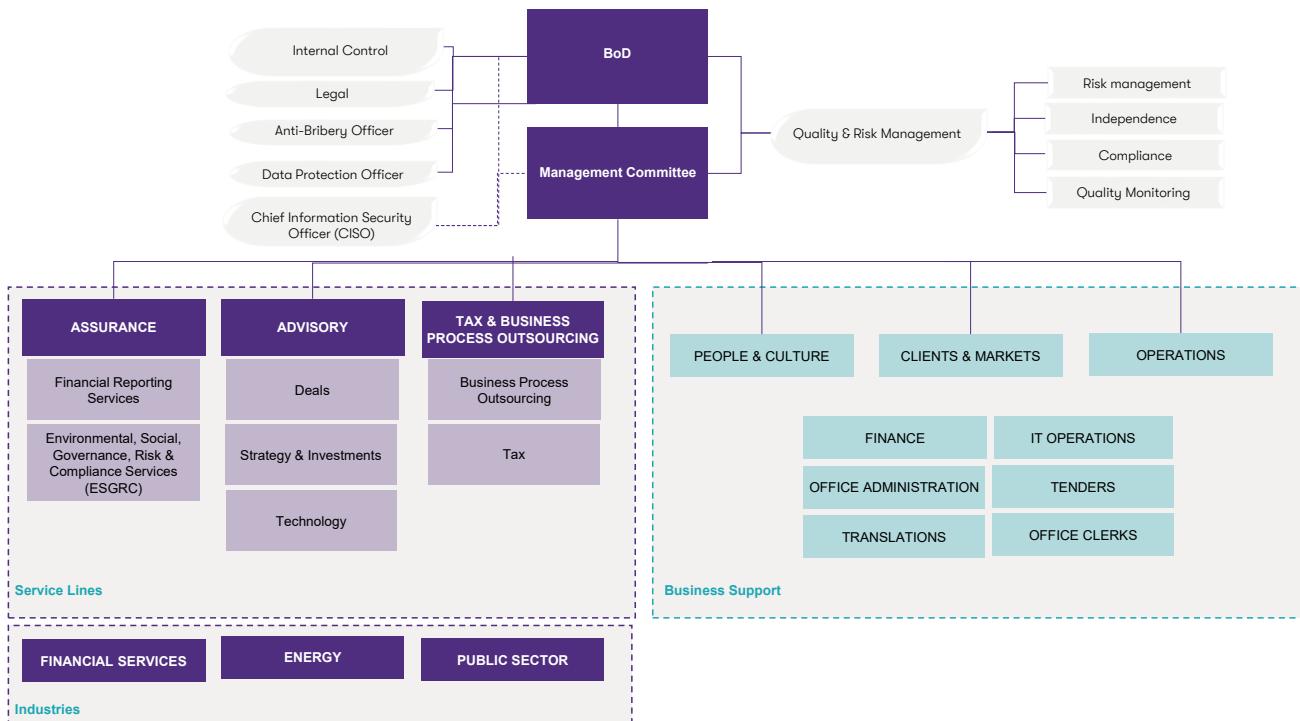
- Service Lines & Industries
- Business Support

The scope and key responsibilities of each unit may be adjusted according to the Company's needs at any given time.

Any adjustment requires the approval of the 2/3 of the members of the Management Committee.

The Internal Regulations are reviewed on a regular basis and may be updated if necessary to reflect organizational changes in the structure and operation of the Company.

## The organization chart of the Company presents the structure of Grant Thornton in a diagram form



**Manolis Michalios**  
Partner, Assurance Leader



**Konstantinos Kazas**  
Partner, Advisory Leader



**Nikos Ioannou**  
Partner, Tax & BPO Leader

## Corporate Governance

### Partners Meeting

The Partners Meeting is the supreme body of the Company, responsible for the approval and/or ratification of strategic decisions in accordance with the Law and the Articles of Association.

The Partners Meeting is attended by every shareholder who has and can prove this status on the day of the Partners Meeting. Shareholders who are legal entities participate in the Partners Meeting through their representatives.

The Partners Meeting shall convene at least once every fiscal year, no later than on the tenth (10th) calendar day of the ninth month following the end of the fiscal year, to decide on the approval of the annual financial statements and on the election of auditors (Regular General Meeting). The Regular General Meeting may also decide on any other matter within its competence.

Without prejudice to the provisions of the Law, the Partners Meeting shall convene at any time in an extraordinary manner at the request of the persons provided for by Law, usually whenever the Board of Directors deems it appropriate or necessary (Extraordinary General Meeting). The Extraordinary General Meeting may decide on any matter within the competence of the Partners Meeting, except for those powers which, according to the law or the Articles of Association, fall within the exclusive competence of the Regular General Meeting.

The Partners Meeting shall normally decide by simple quorum and majority, except in certain cases, when Corporate Law 4548/2018 or the Articles of Association require an increased quorum and majority.

Indicative examples of such cases are the following: increase/decrease in share capital, issuance of a bond loan subject to the Board of Directors' authority to issue a bond loan (joint or convertible), in accordance with the Law and the Articles of Association, change in profit distribution, increase in shareholders' liabilities, approval of new shareholders, transfer of shares and removal of shareholders.

## Board of Directors

The Board of Directors as a corporate body, acts collectively and exercises the management of the Company. For matters falling within the Company's daily operations, for which no collective action is required, the Board of Directors, by force of its decision, assigns exclusively and in writing, the exercise of all its powers and responsibilities as well as the representation of the Company to the Managing Partner or to any person, BoD member or not, at the same time determining the extent of the assignment.

The Board of Directors shall convene whenever required by Law, the Articles of Association or the needs of the Company. Unless otherwise specified by Law or the articles of association, the decisions of the Board of Directors are validly taken by an absolute majority of the members present and represented. Regarding the meetings and decisions of the Board of Directors, minutes are kept and are consequently signed by the President and BoD members. Copies and excerpts of the minutes shall be officially issued by the President, the Managing Partner or any other advisor designated for this purpose by decision of the Board of Directors, without requiring further validation.

The members of the Board of Directors are elected by the Partners Meeting for a four-year term. The term shall be automatically extended until the first Partners Meeting following the end of their term of office which cannot exceed five years.

### The members of the Board of Directors on the date of publication of the Report are as follows:

- Sotirios Constantinou, President
- George Deligiannis, Vice President
- Vassilis Kazas, Managing Director
- Manolis Michalios, Member
- Nikolaos Ioannou, Member
- Athanasia Arabatzi, Member
- Marina Chrythansopoulou, Member
- Konstantinos Kazas, Member
- Pelagia Kaza, Member

As at the date of the Report, the Board of Directors consists of 9 persons, all Partners, and Certified Auditors.

## Management Committee

The Management Committee is authorized to manage the Company, to design its strategic and policy development based on the approved business plan and to manage the Company's property, assets and resources.

The Management Committee is responsible for monitoring operations and implementing corporate strategy by supervising the overall operations of all Company's Departments, Committees and Divisions, preparing the budget and managing the Company's resources.

The Management Committee consists of Partners of the Company.

## Global Quality Framework

Grant Thornton is committed to operating using global quality standards to ensure the quality of its services.

The role of the Quality & Risk Management Department is to ensure that the quality framework, policies, and procedures adopted by Grant Thornton, are observed and operate effectively in order to provide quality services and minimize corporate risks.

Our objective is to adopt and operate an effective quality management system that focuses more towards prevention, risk management and less towards ex post corrective actions.

High quality services are a fundamental requirement, and the Company is in a continuous procedure of identifying appropriate controls to address threats and risks in relation to the achievement of quality objectives.

## Quality & Risk Management

The responsibilities of the Quality & Risk Management (Q&RM) Department, as a whole, for the Company's activities are as follows:

- Risk Management
- Quality Monitoring
- Compliance
- Independence

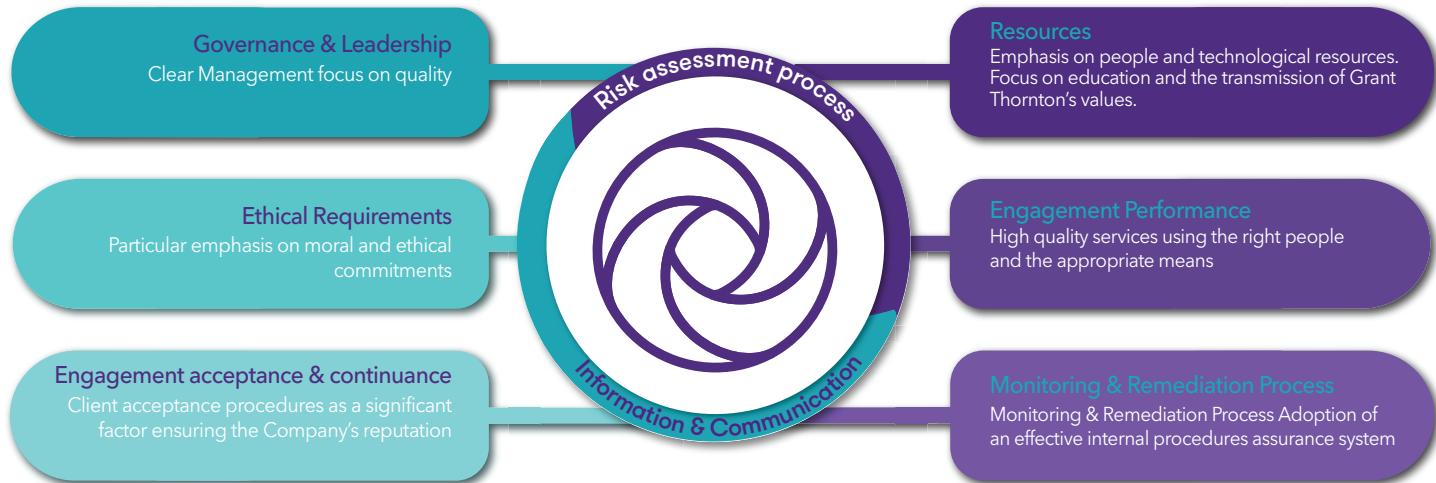
### Head of Quality & Risk Management Department:

Dimitra Pagoni, Partner

## Risk Management

Risk Management describes policies & procedures established to minimize professional and business risks arising from the services we offer to our clients. As part of the implementation of the new quality management

## The following diagram illustrates the pillars of Grant Thornton's international quality framework



standards (International Standard of Quality Management - ISQM 1), our Company proceeded with revisions, updates and adjustments of quality policies and procedures to comply with the new requirements. The revised quality policies and procedures are included in the new Quality Management Manual (QMM) which reflects the organization's comprehensive quality management system and includes all policies and procedures governing the Company's operations.

In addition, the Company has established policies and procedures to ensure the right professional conduct of the Company's employees with clients, partners and other third parties, in the context of Professional Ethics as established through professional standards and legislation (Ethics & Governance).

The Code of Conduct has been uploaded on the Company's website and on the Company's internal Intranet (SharePoint) for easy access by all employees.

## Independence

Grant Thornton has established an Independence Team of professionals who specialize in independence and conflict of interest issues.

For a detailed description, please refer to the section "Independence, Integrity, and Objectivity".

## Quality Monitoring

Quality control determines the degree of compliance of the audits performed with the requirements of the International Standard on Quality Management (ISQM 1).

For a detailed description of the role and activities, please refer to the sections "Independence, Integrity and Objectivity" and "Quality Monitoring".

## Compliance

Compliance relates to Grant Thornton's policies and procedures on Compliance and Anti-Money Laundering, corporate and statutory audit legislation, as well as all GTIL network policies (Member Firms Obligations - MFOs).

For a detailed description of the pillars and responsibilities related to the Q&RM Department, please refer to the section "Quality and Risk Management Department".

## Internal Audit

Internal Audit ensures compliance with the effective legislation and sound organization and operation of the Company.

## Anti-money Laundering (AML)

Law 4557/2018 on the "Prevention and Suppression of Money Laundering and Terrorist Financing" as amended and effective ("the Law") transposed Directive 2015/849/ EU, as amended following Directive 2018/843/EU, into the Greek legislation. According to Article 5 of the Law, certified public accountants and auditing firms registered in the public register (Register of Auditors) of the Hellenic Accounting and Auditing Standards Oversight Board (hereinafter HAASOB) are considered liable parties. This designation also extends to external accountants, tax advisors, and any other individuals or entities primarily engaged in providing assistance or advice on tax matters as their primary business or professional activity. Consequently, the Company falls under the purview of the Law and is subject to all related obligations. Furthermore, HAASOB has issued Regulatory Act No. 001/2021 as the supervisory authority for Certified Auditors and Auditing Firms to be applied in addition to the Law (together the "Regulatory Framework"). The Company has established a policy for prevention and suppression of money laundering and terrorist financing (AML/CFT Policy) with the objective of full compliance with the applicable Regulatory Framework. The Company has also adopted a Client Risk Assessment and Classification Procedure.

The policy addresses all the Company's employees - in particular, those who provide services to clients, as they should be aware of the procedures to be followed in case of transactions with the clients. The Company ensures full training of its employees to apply correctly and in practice what is defined by Law 4557/2018 and its internal policy, thus aiming at its fuller compliance with the current regulatory framework.

Company policies and procedures include a detailed review of the following sections:

- Client Due Diligence Measures (Simplified/Normal/ Enhanced)
- Client, business relationship and transaction risk assessment and periodic review thereof
- Forming a comprehensive profile of the Client
- Access to the Central Ultimate Beneficiary Owners Register of Article 20 of Law 4557/2018
- Reporting suspicious transactions
- File storage
- Employee training and education
- Processing Personal Data in the context of the implementation of Law 4557/2018
- Establishing a whistleblowing mechanism

Pursuant to Decision No. 125209 EE 2022 of the Ministers of Economy and State (Greek Government Gazette Issue B'4750/2022) the Company, as an entity subject to Law 4557/2018, has from 28.02.2023 unrestricted access to the Central Ultimate Beneficiary Owners Register exclusively for the purposes of exercising due diligence measures as for the client. Access to the Register will be granted to the authorized users-members of the Company's AML Committee, appointed by a representative of the Company certified in the Taxisnet authorization system.

The supervising Authorities regarding the proper observance and application of Law 4557/2018 by the Company are as follows:

- Hellenic Accounting and Auditing Standards Oversight Board (HAASOB) (for "Grant Thornton S.A. Chartered Accountants Management Consultants")
- Independent Authority for Public Revenue (AADE) (for "Grant Thornton Tax and Business Advisory Solutions S.A.")

The Company's Board of Directors has appointed a certified auditor, executive officer, and permanent associate to serve as Compliance Officer. This individual will be responsible for ensuring that the Company complies with the obligations arising from legislation on prevention and suppression of money laundering and terrorist financing.

Furthermore, the Company's Board of Directors has made the following decisions: a) an executive has been appointed to oversee compliance with the Law and the suitability of employees who have agreed to fulfill these obligations, and b) a two-member independent control committee was established within the Company with the authority to verify the implementation of internal policies, controls, and procedures adopted by the Company, in compliance with the requirements of Law 4557/2018.

## Basic Assurance Committees

The following Committees have been established in the framework of the Assurance Service Line:

### Methodology & Technology

The objective of the Committee is:

- quality through improving the deliverables in terms of audit approach and guidance of the audit teams during the conduct of their audits
- homogeneity through the effective embedding of instructions and rules given by the global network to provide high quality services
- support of the audit teams by providing tools that fully comply with both the network rules and the local regulations.

The main responsibilities of the Committee are:

- introduction and adoption of auditing standards & tools as they are proposed and implemented worldwide by the network
- introduction and adoption of rules and practices of local regulators to comply both with International Standards on Auditing and with any local regulatory decisions
- establishment of guidelines, tools and standards to achieve full compliance with the audit approach and practice both locally and globally
- assistance at technical level to resolve audit methodology issues

### Assurance Risk & Performance Assessment

With an ultimate scope to minimize audit risk, the objectives of the Committee are:

- identification of significant risks and assurance that:
  - appropriate action to address them is taken
  - the appropriate shareholders are in charge
- execution and monitoring of the budget procedure of human resources for maximum efficiency

The functions of the Committee refer to:

- monitoring the distribution of Partners to projects
- sharing the project distribution file with Partners
- management & evaluation of the distribution and all relevant issues that arise
- monitoring & evaluation of all audit risks. Gathering information regarding audit risks
- monitoring the audit risks per engagement
- reporting to the Assurance Partner and the Management Committee of issues that arise from risk assessment





# Independence, Integrity & Objectivity

The Company has established policies and procedures which promote and ensure independence, objectivity, and integrity, both for the Company and for all its staff when rendering services.

All personnel are under obligation to examine whether their independence is threatened in any possible way, every time they undertake the conduct of an audit. In particular, the members of the staff shall examine whether their relations (financial, professional, personal) with every client or its associated person or an entity might lead a knowledgeable, objective, and prudent third party to arrive at the conclusion that the independence of the members of the staff or that of the Company is threatened. In such a case, they are under obligation to inform Grant Thornton about this relation and refuse to conduct the audit. Furthermore, every year, all staff sign an annual declaration of independence, in accordance with the requirements of the International Standards on Quality Management and the effective legislation. In this statement all staff confirm their independence in relation to audit clients and that they have remained in compliance with the applicable ethical policies during the period under review.

The Company policies that serve the above objectives of independence, integrity and objectivity are analytically described in the "Quality Management Manual - QMM" and are annually reviewed and revised by the Quality & Risk Management Department. Grant Thornton's policies and guidelines regarding issues of independence have been reviewed in line with the effective legislation governing statutory audits of annual separate and consolidated financial statements as well as specific requirements arising from implementation of Regulation 537/2014 regarding Public Interest Entities (PIE).

The Quality and Risk Management Department and in particular specialized executives with relevant experience undertake the conduct of relevant reviews at regular intervals on the implementation of procedures and discloses the findings to the Management Committee of the Company.

The reviews are conducted based on specifically prepared review plan in line with the Standards on Auditing, revised when deemed necessary.

The policies and procedures also provide reasonable assurance when the Company uses the services of external experts and consultants, to ensure that the consultant is adequately qualified, independent from the Company and entity under audit and objective.



# Quality & Risk Management

## Objective

The Department's primary objective is to implement the Company's corporate strategy through application of the quality and risk management framework, as defined by Grant Thornton International Ltd (GTIL) network and in accordance with the international practices.

In the context of the Company's operations, the Quality and Risk Management Department is responsible for defining the key quality objectives aimed at:

- Adopting and continuously improving the overall System of Quality Management (SoQM).
- Ensuring compliance with the legislative and regulatory framework and professional standards.

The Quality & Risk Management Department operates independently and is not subordinate to any other Company department. It reports directly to the Company's Management Committee, in which it is actively represented

## Key pillars of operation and responsibilities of the Quality & Risk Management Department

The Risk Management pillar focuses on designing and monitoring policies and procedures to minimize professional and operational risks associated with the services offered to clients.

The key responsibilities are as follows:

- Development and operation of the overall Quality Management System in accordance with current professional standards and Grant Thornton network policies.
- Design and implementation of a risk assessment process within the quality management system. The process aims to define quality objectives, identify and assess quality risks, and plan and implement actions to address these risks (in accordance with ISQM1).
- Preparation, update and disclosure of the Quality Management Manual (QMM) to the staff. The Quality Management Manual (QMM) describes the Company's quality policies and procedures.
- Development and adoption of quality policies and procedures in accordance with applicable legislation and specific legislative, regulatory requirements and policies of the Grant Thornton network
- Projects approval for new and existing clients and assessment of risks associated with the assignments in accordance with the Company's internal policies and procedures for client acceptance.
- Adoption of policies and procedures within the framework of the Company's obligations as arising from the implementation of legislation on the prevention and suppression of money laundering and terrorist financing (Anti-Money Laundering - Law 4557/2018).
- Approval of client projects, verification of legal documents, and monitoring of compliance procedures to address the risks of money laundering and terrorist financing.

- Information and training of the staff through seminars, presentations, consultations and alerts on the Code of Conduct, Ethics and changes in legislation and regulatory framework.

- Provision of guidance and consultation on quality management issues, including suspected non-compliance with legislation, regulations and regulations penalties.

## Independence

The Independence Pillar oversees monitoring the independence issues, investigates relationships and conflicts of interest, and ensures compliance with all the applicable legislation.

The main responsibilities are as follows:

- Updating and monitoring the centralized system for registering interests (GIS, Global Independence System) in terms of recording financial data by all staff at higher hierarchical levels.
- Monitoring and managing the issues of independence at a firm level and at a project and employee level (engagement and personal independence).
- Undertaking relationship investigation procedures to identify issues of conflict of interest (Domestic/ International Conflict Checks) and evaluating relationships for potential conflict of interest.
- Conducting annual confirmation procedures of staff independence (Independence Declarations).
- Providing consultation for the assessment and provision of non-audit services, as well as other projects, and applying the relevant safeguards. In cases where risk mitigation is not feasible, the project will not be undertaken.

## Compliance

The Compliance pillar focuses on monitoring and ensuring compliance with the requirements arising from the corporate legislation and regulatory framework.

Main responsibilities:

- Ensuring that the Company complies with the Code of Ethics of the International Accountants Ethics Board (IESBA) IFAC, European Regulations, applicable legislation on statutory audits and GTIL network (Law 4449/2017, EU Reg. 537/2014, MFOs).
- Ensuring timely and accurate data submission to regulatory authorities, monitoring changes in regulatory requirements, and updating the Company's Management.
- Overseeing compliance with obligations arising from the GTIL (Member Firm Obligations - MFOs) and local regulatory authorities, ensuring that policies and practices are aligned and consistently applied.
- Developing and maintaining a compliance program to ensure ongoing adherence to requirements (duty log, compliance control procedures, etc.).

## Quality Monitoring

The Quality Monitoring pillar focuses on monitoring and controlling the implementation of the policies and procedures of the Company's Internal Quality Network System. In particular, is responsible for planning, organizing and implementing quality control procedures for the services provided.

Main responsibilities:

- Performance of quality control procedures on a sample basis on assurance files and advisory and tax services projects on an annual basis.
- Review and annual assessment of the Company's compliance with the principles and requirements of the International Standard on Quality Management 1 (ISQM1) and Grant Thornton International (GTIL - MFOs) guidelines.
- Carrying out of extraordinary quality reviews due to special circumstances (complaints, negative publications, fraud cases).
- Extraction and calculation of Audit Quality Indicators - AQIs for the monitoring of quality procedures.
- Investigating root causes of findings (Root Cause Analysis - RCA) and initiating remedial actions.
- Disclosure of quality reviews findings to staff and cooperation with the Methodology and Technology (M&T) Committee and Human Resources (HR) to identify additional training needs.

As part of its responsibilities, the Quality and Risk Management Department informs the Management Committee of cases of non-compliance with the quality policies and submits specific action plans to eliminate such cases and improve the quality of services.

## Global Independent System (GIS)

The Global Independence System (GIS) is GTIL's secure website for recording financial interests.

**Financial interests of GTIL's members are defined as any income or payment arising from stock, stock options, warrants, loans or any other investment or ownership interest including rights and obligations pertaining to acquisition of securities and derivatives of direct associates - clients.**

All the executives of Grant Thornton International member firms are required to maintain a portfolio of their financial interests and update it on monthly basis.

When necessary, the GIS administrator also updates the Global Restricted List (GRL), on which GIS is based, with

the Public Interest Entities under audit, which constitute the Company's «Restricted Audit Clients.» In this way, these companies are displayed as «RESTRICTED» for the entire GTIL network.

The implementation of these procedures ensures that no member of Grant Thornton network can hold shares of any company marked as "RESTRICTED" by another member firm.

The aforementioned systems and procedures are followed within the frame of the general plan of Global Independence & Risk Management of GTIL and are aimed at providing further assurance that member firms and executives comply with all applicable independence requirements.

## Non Audit Services - NAS

Grant Thornton has established policies and procedures to ensure independence based on the IFAC International Ethics Standards for Accountants, as well as the independence policies developed by GTIL and implemented by all member firms in its network. In addition, the firm provides continuous independence training to all staff.

As part of the procedures for accepting a non-audit engagement from a client to whom audit services are provided, an assessment of the potential independence risks and threats must be carried out in advance and safeguards must be implemented to mitigate them. The Senior Independence Team is responsible for assessing the proposed non-audit services and for providing guidance and support regarding the implementation of the ethical standards (independence consultations) in cooperation with the engagement partners of the assurance engagements. When an independence issue arises and the risks cannot be mitigated, the non-audit service is not approved, and no offer is made to the entity under audit.

Prior to provision of any kind of non-audit service to a client, every GTIL member firm is obliged to ascertain whether another GTIL member firm conducts an audit in connection to the same client or to a client's related entity (parent or subsidiary).

In such a case, it shall contact the GTIL member firm conducting this audit, to estimate the compliance with independence requirements in this particular case and ensure that the non-audit services required do not threaten the independence of the member firm conducting the audit.

## Employment with Clients

All Company members are obliged to directly inform the Managing Director or the Head of their Department about employment offers made to them by a client.

In case the independence regulations are threatened, an employee is excluded from performing any kind of work for the client till the employment offer is declined or withdrawn.

## Conflicts of Interest

A conflict of interest is defined as a situation in which the objectivity and independence of a firm are threatened.

More specifically, a conflict of interest may arise when the company provides services to a client while also maintaining any kind of financial, professional or other relationship with another person, entity, product or service. A client or third party may reach the conclusion that the Company's objectivity and independence are under threat as a result of this relationship.

Potential conflicts of interest in relation to projects undertaken both in Greece and globally are monitored by the Quality & Risk Management Department.

The policies and procedures related to the auditor's independence are described in the Quality Management Manual (QMM) and in internal updates (Alerts).

## Client Confidentiality

All relations with clients are confidential and all measures are taken to prevent any breach of confidentiality.

During an engagement, the audit team may become aware of confidential client information, such as future business plans, the results of current operations, payroll procedures, personnel matters, etc. Particular attention is paid to maintaining the required level of confidentiality.



## Acceptance of Clients

The Client Acceptance Policy is aimed at ensuring the independence of our Company and the high quality of its audits. In this respect, the clients acceptance policy is also a key parameter of the Company's overall quality control system. The Company must assess and evaluate each new client prior to acceptance. It involves evaluating both the client's managerial integrity and the Company's ability to provide an appropriate quality service based on its experience in the industry, the nature of the engagement in question and the adequacy and availability of its staff.

The responsible partner and the project manager prepare the acceptance form; outlining the significant issues which have been examined and evaluated during the client acceptance process. Members of the Quality & Risk Management Department evaluate the results of the process in accordance with the Company's acceptance policy.

During the new client acceptance process, specific client identification checks are carried out and due diligence measures are taken according to each client's degree of risk, and the Quality & Risk Management department submits its agreement or disagreement for the acceptance of each new client.

The partner in charge at the time also participates in the new client acceptance process.

Finally, due diligence measures are applied not only to new clients but also to existing ones, should changes in the shareholding structure or representation of the Company have occurred.

The above measures are implemented in accordance with the provisions of the relevant legislation and the Company's internal procedures.

The procedure aims to efficiently evaluate the aforementioned critical issues on each occasion and refrain from providing services with an increased risk in a timely manner. As part of this process, the conflict check which may arise from possible cooperation between the client or an affiliated company with any GTIL Network member firm is also examined. If the company has an international presence, an additional independence check is performed before the client is accepted through the Global Relationship System (GRS) control system.

The client acceptance process is essentially automated through the creation and operation of a database, which includes all the necessary client acceptance information and is constantly updated. The Company's Management and authorized executives can access this database directly through software installed on their computers.

## Annual Client Continuance

At the end of each engagement, the engagement partner is required to assess whether the Firm should continue to serve the respective client. This assessment includes an evaluation of the risks associated with each specific engagement. The partner - in - charge and/ or project manager prepares the re-acceptance form, which includes important issues that can potentially arise

during the conduct of the engagement and the potential consequences regarding client continuance. This document is submitted to the Quality & Risk Management Department for approval.

During the above process, the partner - in - charge shall consider factors relating to clients such as:

- circumstances indicating the possibility of late payment or inadequate audit fees
- any changes in the objective of our engagement
- significant changes in ownership, management, or changes in the organizational structure and nature of the Company's activities
- inability to cooperate with the Company's management and, in particular, with the financial department
- unexplained delay in the delivery of the necessary evidence for the completion of our engagement
- serious financial difficulties or possible risk indications in the client's financial statements

**The results of the above process are submitted to the Quality & Risk Management Department, which ultimately approves or rejects each client.**

## Global client acceptance/ continuance procedure



## Engagement Performance

### Assignment of individuals to engagement teams

The assignment of members to each engagement team requires prior assessment and evaluation of the members' and the team's competence and experience. This assessment takes into account factors such as the size and the complexity of the particular audit, professional skills required, available time of the members and the partner-in-charge, audit conduct deadlines, etc.

## Supervision

Supervision involves monitoring and controlling the operations of audit team members by the project manager and/or partner throughout the audit. In any case, the project manager and the partner - in - charge shall supervise the implementation of the Company's professional standards, regulatory requirements, policies and operating procedures. This way, the necessary procedural adjustments can be evaluated in a timely manner so that the appropriate changes/modifications can be made to the audit approach in the audit plan. The project manager and the partner examine the audit team's capabilities and whether they have sufficient time to perform the engagement. They also identify issues that are subject to consultation with more experienced members.

## Review

The partner -in -charge reviews the audit work to consider whether it has been performed in accordance with professional standards, whether or not the findings are supported, the necessary consultations have been held and sufficient and appropriate evidence has been obtained to support the report.

To avoid the risk of familiarity and ensure that the rotation requirements for PIEs are applied after the maximum period has expired, the auditing firm may be reappointed after a cooling-off period of four years.

The Company has adopted mechanisms to monitor and comply with the rotation requirements for auditing firms and certified auditors.

## National Technical Office

Our Company has adopted an internal consultation policy for audit teams in collaboration with the National Technical Office, which provides guidance on difficult or controversial issues faced by audit teams in the performance of their audit, through specialized staff.

The greater the complexity or significance of an issue, and the greater the degree of judgement required, the more likely it is that consultations with the National Technical Office will be needed. The person responsible for the audit, i.e. each Certified Public Accountant, leads and actively participates in the consultations, ensuring that they are properly recorded and agreed upon by the parties, and that the conclusions are implemented.

The specialized executives of our Company who comprise the National Technical Office have extensive experience and high knowledge of issues related to both auditing methodology and International Financial Reporting Standards.

## Audit work milestones

In accordance with our internal procedures, we establish audit work milestones for each stage of our audit (planning, performing audit procedures and completion of the audit) in order to improve and monitor our audit and resource management. The firm adheres to the audit milestones and monitors each stage of the audit to ensure its timely completion while maintaining high quality standards.

The main objective of the audit work is:

- quality assessment of the audit
- determining actions to improve the quality of the audit
- the positive impact on employees' wellbeing.

It should be noted that the timely and effective preparation of teams before the end of the financial year significantly optimizes their operational functioning.

This is particularly important during periods of heavy workload. The completion and/or planning of a significant part of the audit work in advance allows for the rational management of resources and time, strengthening the ability of teams to focus on the timely completion of audits and ensuring high-quality project deliverables.

## Mandatory Firm Rotation

Pursuant to EU Regulation 537/2014 and Law 4449/2017, our firm complies with the provisions regarding the maximum term of the statutory audit of Public Interest Entities for a maximum period of ten years.

## Rotation of Engagement Partners

To maintain the independence of the statutory auditor or auditing firm in relation to statutory audits of entities that are not of public interest, the key audit partners responsible for carrying out the statutory audit must cease their involvement in the statutory audit of the audited entity no later than seven years from the date of their appointment. These partners may not participate again in the statutory audit of the audited entity until three (7) years after the date of their appointment. Furthermore, they are not able to participate again in the statutory audit of the audited entity until three (3) years after such cessation. Specifically, for the key audit partners responsible for conducting the statutory audit of Public Interest Entities, in accordance with Article 16 of Regulation (EU) 537/2014, there is a requirement to cease their involvement in the statutory audit of the audited entity no later than seven (7) years from the date of their appointment. The Company has adopted a key partner rotation policy and complies with the requirements of the Code of Ethics regarding the time on and time off period depending on the key partners' roles in successive years of providing statutory audit services.

## Grant Thornton Greece has adopted a new cloud-based Leap Assurance technology platform.

This technological platform introduces a modern, global approach to auditing, ensuring that our global methodology is updated in a timely manner and that the quality of our audits is continuously improved. Our Company has achieved further improvements in quality and overall efficiency as a result of its adoption.

Leap's primary objectives are to uphold quality as a core principle in our operations and to facilitate the execution of our global network strategy. The technology platform's enhanced collaboration and workflow features contribute to a reduction in administrative burdens, making it user-friendly and straightforward.

## Digital audit

Grant Thornton's mission is to deliver premium audit services and promptly address its clients' evolving expectations.

We have set standards with a view to maintaining high levels of audit quality. To achieve these goals, we have proceeded to streamline the demanding audit program through centralization and digitalization of routine audit procedures. In this way, we ensure that the audit team focuses on substantive and high-risk issues.

To that end, we invest in technological tools suitable for monitoring the progress of the audit program, as well as the digitization of audit documentation.

Through these technological tools we achieve:

- linking the multiple data
- faster processing of large volumes of data
- targeted analysis of demanding data
- automation
- standardization of processes

The technological tools are software programs through which the following tasks are carried out:

- Data control, regardless of volume and degree of difficulty. This data are analyzed at different levels in order to identify entries that deviate from the usual ones. Such actions may be indicative of fraud and raise issues for consideration by the client's management.
- Validation checking and analysis of iXBRL/ xHTML file formats ESEF Regulation is mandatory since the Financial Statements of 2021 and requires all issuers with securities listed on an EU regulated market to prepare their annual financial reports in iXBRL/ xHTML format, using iXBRL technology which is based on the ESEF taxonomy.
- Direct access to data in machine-readable format, useful audit functions and direct access to electronic data format (ASCII, DBF). It facilitates the examination of entire accounts or selected fields and records and the performance of calculations and other operations useful to the auditor
- Conversion of books and PBC files into an editable format, carrying out accounting reconciliations, preparation of analyses. In addition, it easily converts complex or large-sized files into an editable format
- Receiving and monitoring the data requested by clients (PBC) for the performed audits, through a cloud application specifically designed to meet the needs of the projects being, which contributes to more efficient collaboration and work completion
- More efficient collaboration and work completion.

## Resolving Differences of Opinion

Differences of opinion among audit team members regarding accounting principles, auditing, reporting, and independence are usually resolved in a timely manner within the team with appropriate and adequate documentation.

In the rare event when differences of opinion cannot be resolved by the team, the Head of Assurance should be consulted and tasked with resolving such differences.

In case there is difference of opinion between the Engagement Quality Reviewer and the Engagement Partner, they shall consult the Head of Assurance. If the issue is not resolved even after the Head's intervention, the issue is communicated to the Management Committee.



## Personal Data Protection

Grant Thornton is committed to adhering to the provisions and fundamental principles of the European General Data Protection Regulation (No. 679/2016) and the Law 4624/2019, in addition to the relevant Greek and European legislation concerning personal data protection. Grant Thornton has established the relevant internal procedures and policies for processing its employees' personal data (including candidates and former employees), clients, suppliers, and external collaborators. These measures ensure that any processing takes place in accordance with the regulatory framework. It also applies appropriate technical and organizational measures, contractual commitments, and other guarantees. Furthermore, it regularly reviews the content and scope of implementation of these measures and monitors sound and constant personnel compliance with the aforementioned regulations. The primary objective of these measures is to protect and process personal data lawfully. As part of its compliance with the Regulation and the Applicable Law, from the very beginning of the application of the Regulation, Grant Thornton has created a competent team for the protection of personal data and has appointed a Data Protection Officer (DPO).

Finally, Grant Thornton ensures a high level of personal data protection by applying the effective standard contractual clauses of the European Commission for the transfer of personal data to third countries, for which no adequacy decision has been issued by the European Commission.

## The Company's updated Privacy Policy is published on its website.

[\(https://www.grant-thornton.gr/en/privacy-policy1/\)](https://www.grant-thornton.gr/en/privacy-policy1/)

## Anti-Bribery Policy

Grant Thornton strives to maintain a business culture based on transparency and trust, as well as high standards of business ethics.

In this context, it has adopted an Anti-Bribery Policy with the aim of establishing the requirements for the development and maintenance of an effective Anti-Bribery Management System that will fully support its strategic and operational objectives

Grant Thornton's key objectives for the prevention of bribery are:

- Ongoing compliance with all Anti-Bribery legal and regulatory requirements
- Complete rejection of bribery by all employees and partners
- Zero Tolerance for Bribery and corrupted activities
- Continuous training of staff
- Encouraging employees to report incidents in good faith, with reasonable suspicion and without fear of reprisals

- Thorough assessment of the bribery risk of suppliers, subcontractors, and partners during the general assessment stage prior to the commencement of the engagement.

To this end, the Company has appointed an executive specifically responsible for managing issues related to this Policy, has updated the evaluation process and contractual terms with suppliers/subcontractors/partners, and implements a confidential complaint management mechanism for both staff and third parties.

## The Company's Anti-Bribery Policy is published on its website.

[\(https://www.grant-thornton.gr/about-us/anti-bribery-policy/\)](https://www.grant-thornton.gr/about-us/anti-bribery-policy/)

## Whistleblowing Policy

Grant Thornton maintains an internal and external Whistleblowing Policy, which has been implemented since 2019 and 2021 respectively.

Grant Thornton has ensured that the above policy complies with the provisions of Law 4990/2022. This law aims to provide a comprehensive framework for protecting individuals, including employees, clients and suppliers, who report violations of EU law. It also ensures compliance with Directive (EU) 2019/1937 of the European Parliament and of the Council, as well as all legal and regulatory requirements related to the law and any other applicable legislation.

The Company's whistleblowing system enables employees to report suspected misconduct and in complete confidentiality, while also offering the option of submitting anonymous reports. It is an important tool for reducing risks, identifying and preventing improper practices, preventing unethical behavior, and maintaining trust in our activities, allowing us to take timely action in cases of possible misconduct.

## The Company's Whistleblowing Policy is published on its website.

[\(https://www.grant-thornton.gr/about-us/whistleblowing-policy/\)](https://www.grant-thornton.gr/about-us/whistleblowing-policy/)



# Quality Monitoring

## System of Quality Management (SoQM)

The objective of Grant Thornton Greece is the establishment of a System of Quality Management (SoQM) for work and quality control procedures which will ensure and guarantee the high standards we have set for the services we provide.

The independence and quality of services provided are very important factors for sustainability and the future of our activities. Therefore, we have designed and implemented an integrated policies and quality control procedures framework, accompanied by risk assessment mechanisms and monitoring systems. This framework ensures independence and guarantees that the Company complies with the high-quality standards, fully aligned with its clients' expectations.

The Company applies strict quality management procedures such as:

- Technical and procedural manuals to ensure that the project is delivered to a consistently high standard
- continuous training for all partners and staff, including annual appraisals
- proactive quality control procedures to ensure that each assignment meets the required standards (Engagement Quality Reviews -EQR) in compliance with the requirements of the International Standard on Quality Management 2)
- reviewing procedures for quality monitoring, which ensure the efficiency and smooth operation of quality management procedures (Internal Quality Management Review - "ISQM1" - quality reviews)

To this end, Grant Thornton has adopted a risk management framework whereby management assumes responsibility for the quality of services provided and ensures that appropriate procedures are implemented on an annual basis. If any weaknesses are identified, the necessary measures are developed with full monitoring of the corrective actions (Remediation Plan).

In accordance with the standard's requirements and the company's strategic objectives, Grant Thornton has established specific roles and responsibilities for specialized executives with the relevant experience. This ensures effective management of the quality system.

ISQM2 (Engagement Quality Reviews) was implemented on December 15, 2022, as was ISQM 1, and pertains to the appointment and selection of an independent Engagement Quality Reviewer for the review of a specific audit engagement.

Additionally, the responsibilities and procedures for conducting and documenting an effective quality control review before issuing the audit report are outlined. In audited Public Interest Entities, as well

as in other cases, the Quality and Risk Management Department is responsible for appointing the partners who will manage the quality of the independent review.

It should be noted that Grant Thornton has adopted a risk management framework whereby management assumes responsibility for the quality of services provided and ensures that appropriate procedures are implemented on an annual basis. In the event that any weaknesses are identified, the necessary measures are taken with full monitoring of the corrective actions (Remediation Plan).

During the risk assessment process, the Company set quality objectives, assessed and evaluated quality risks, and adopted/documenting policies and procedures to minimize risks (Responses to risks).

The System's Quality Management approach is based on the following:

- a robust and rigorous risk-based audit approach. We use significant resources to ensure the quality of control and the professional and technical training of our staff.
- development of a corporate culture which promotes audit quality (Leadership & Governance Responsibilities for Quality within the Firm)
- ethics and integrity. We only accept and continue to provide services to clients that demonstrate integrity and are considered low risk. This is achieved through sound assessment of the relative parameters pertaining to acceptance and continuance of clients (Acceptance & Continuance of Client Relationships & Specific Audit Engagements policies & procedures)
- skills and personal qualities of partners and staff and their compliance with IFAC Code of Ethics for Professional Accountants (Relevant Ethical Requirements), the proper conduct of audits in accordance with professional standards and legal requirements for the issuance of appropriate audit reports. Provision of appropriate methodological and technological tools (Engagements Performance Policies & Procedures)
- development of an effective system for monitoring and controlling the work performed and human resources (Human Capital issues & Resources Policies & Procedures)
- documentation providing reasonable assurance regarding all elements of the Company's quality control system (Documentation)
- constant monitoring and ensuring that quality control policies and procedures are always relevant, modern, sufficient, efficient and comply with the current practices. The procedures should also include permanent evaluation of the Company's quality control systems as well as periodical examination of conducted audits on sample basis (Monitoring & Remediation Policies & Procedures)

- organization of an integrated IT system for provision of information to users with an emphasis on personal data security and cyber security issues (Information & Communication Policies & Procedures)

## Quality Management System

Grant Thornton Greece Quality Management System has been certified in accordance with the Quality Management System Standard BS EN ISO 9001:2015. The Quality Management System is applied to the provision of auditing, tax, and consulting services and applies to the activities of the central offices as well as the Company's branches.

The 3-year certification of Grant Thornton Chartered Accountants Management Consultants S.A. was validated in September 2025 and the 3-year certification of Grant Thornton Business Solutions S.A. was validated in September 2025 by Lloyd's Register Quality Assurance.

Our Company's certification with ISO 9001:2015 validates the high performance in terms of quality of the services we render to our clients.



## Information Security Management System

Grant Thornton Greece is certified according to the international standard ISO/IEC 27001:2013, which ensures the protection of information. ISO/IEC 27001:2013 standard specifies the requirements for an Information Security Management System (ISMS), which enables organizations to protect their valuable assets containing information.

This standard is designed to select appropriate and balanced security controls to ensure the protection of information. In addition, the approach supports the continuous improvement and maintenance of the ISMS through monitoring, reviewing and adapting it to new challenges.

Compliance with our information security policies is continuously assessed by our Chief Information Security Officer (CISO). Our ISO/IEC 27001:2013 certification was confirmed by the independent certification body Lloyd's Register Quality Assurance in December 2024.

This certification reflects our continuous commitment to improving our procedures and enhancing the security of the information we manage.

## Supporting robust audit services

GTIL provides a range of comprehensive resources to support its member firms, including:

- "LEAP" auditing methodology: this is a modern methodology supported by technologically advanced software. The manuals and accounting policies are fully harmonized with International Auditing Standards, International Quality Control Standards, and the Code of Ethics of the International Federation of Accountants (IFAC)
- consultation protocols: special consultation protocols allow member firms to consult with auditors from other member firms.
- comprehensive internal network service including up-to-date information for member firms on professional standards, a global restricted list for cooperation of companies, help desk for International Financial Reporting Standards, thematic information, financial statement standards and examples.

## GTIL Quality Reviews

Every member firm is subject to Quality Review at regular intervals conducted by GTIL. This Quality Review is conducted in terms of assessing member firms' audit procedures carried out at least once every three years by independent and suitably qualified partners and managers from other member firms under the overall direction of GTIL. The review process is designed to monitor member firms' compliance with professional standards and GTIL's audit quality control policies and procedures.

The most recent GTIL inspection took place in October 2024, during which assurance, advisory, and tax project files were reviewed. The implementation of the quality management system (SoQM) policies and procedures and the Company's overall adoption of the requirements set out in ISQM1 were also reviewed.

The Quality & Risk Management Department informs Service Lines Leaders and the Management Committee of the results of quality controls on an annual basis.

The conclusion of GTIL's last Quality Review conducted in March 2025, is as follows:

"In our opinion, the Quality Management System for ensuring the audit practices of Grant Thornton S.A., in place, has been designed and implemented appropriately to provide reasonable assurance regarding the execution and provision of financial information, in accordance with applicable professional standards and the policies and procedures of Grant Thornton International Ltd, in all material respects".

To address the findings and weaknesses identified, the Company established an action plan, which has been sent to GTIL and is monitored on a quarterly basis.

## GTIL's Quality Review Policies and Procedures

In addition to the policies and procedures we have developed internally and in line with GTIL, each member firm must be governed by a Quality Control System. This system has been developed in accordance with the standards issued by the International Federation of Accountants (IFAC) and GTIL's quality policies and procedures

In particular, the Quality & Risk Management Department is responsible for determining the degree of compliance with the requirements of:

- the International Standard on Quality Management 1 (ISQM1). This concerns quality control for companies that conduct reviews and audits of historical financial data and other auditing or similar engagements
- the International Federation of Accountants (IFAC) Code of Ethics for Professional Accountants
- the regulation 537/2014 of the European Parliament on specific requirements regarding statutory audit of Public-Interest Entities and Law 4449/2017 "Statutory audit of annual and consolidated financial statements, public supervision of the audit work and other provisions"

The network and the Company have developed policies and procedures that support the collection and archiving of records with control sheets within a specific time frame, in accordance with professional standards, regulations, and laws. The Company has also established policies and procedures regarding the maintenance of the above digital and other records.

## Quality Control Review

The Quality & Risk Management Department is responsible for implementing and applying our Company's quality control program.

Quality control is carried out by senior company executives who have specialized knowledge in conducting and coordinating quality control through their participation in GTIL seminars and working groups on conducting quality controls in other Grant Thornton member firms.

The Quality & Risk Management Department shall prepare an annual report to the Company's Managing Partner, the Head of Assurance, and the Management Committee.

The main conclusion, based on the results of the latest quality control assessment in accordance with ISQM1, for the year ending 30/6/2025, was that:

"In our opinion, the Quality Management System in place for ensuring the Company's audit practices, has been properly designed and implemented to provide reasonable assurance regarding the execution and provision of financial information, in accordance with applicable professional standards and the policies and procedures of Grant Thornton International Ltd, in all material respects".

The key points arising from the report are presented to all Company members. In addition, the Company, in collaboration with the Methodology & Technology Committee, prepares a special program to improve any weaknesses that have been identified. Quality controls are carried out to ensure that adherence to and harmonization with the policies and procedures established by Grant Thornton Greece are non-negotiable. Quality control covers all partners at least once every three years and all new partners one year after their promotion. The members of the Quality & Risk Management Department are independent of the project files under quality review.



# External monitoring

The Hellenic Accounting and Auditing Standards Oversight Board (HAASOB) is the Supervisory Authority for the audit profession and for the operation of auditing firms. One of its main activities is to monitor the quality of statutory audits conducted by the members of the Institute of Certified Public Accountants of Greece (SOEL).

According to legislation, and in particular, Law 4449/2019, HAASOB:

- is the competent authority providing professional licenses to certified public accountants and auditing firms when they meet the relevant requirements
- is responsible for ensuring the quality of the services of certified public accountants and auditing firms conducting statutory audits

has the authority to receive written reports or complaints of violations of Law 4449/2017 and Reg. 537/2014 and is responsible for imposing administrative penalties for any violations of the law governing the services of certified public accountants and auditing firms. It also has the ultimate responsibility for exercising public supervision of certified public accountants and auditing firms in accordance with the principles provided by Law 3148/2003 as in effect.

Moreover, the Supervisory Authority (HAASOB) has the ultimate responsibility for the supervision of:

- the approval and registration of certified public accountants and auditing firms in the Public Registry
- the adoption of standards on professional ethics, internal quality control of auditing firms and audits, unless those standards have been adopted or approved by the authorities of another Member State
- continuous training
- quality assurance systems
- research and administrative disciplinary systems

Especially in respect of certified public accountants and auditing firms conducting statutory audits of Public Interest Entities, quality reviews should be conducted by the supervisory authority on a risk analysis basis at least every three years.

The Quality Control Council of HAASOB oversees the quality reviews of certified public accountants and auditing firms, in accordance with the provisions of Law 4449/2017.

Finally, the Board of Directors of the Hellenic Accounting and Auditing Standards Oversight Board (HAASOB), taking into account Article 33 of Law 4449/2017, adopted Regulatory Act 155/4/19.10.2018 on assigning the quality review of certified public accountants and auditing firms to SOEL. The objective of this Regulatory Act is to assign the quality review of certified public accountants and auditing firms conducting audits of Entities that are not those of Public Interest to the Quality Control Committee, as in compliance with the provisions of par. 12, Article 33 of Law 4449/2017.

The latest Grant Thornton quality review inspections conducted by the Supervisory Authority in relation to policies and procedures developed in the context of its sound operation was conducted between March 2021 - June 2021, based on the International Standard on Quality Control (ISQC) 1. During this period, reviews were conducted in audit files of two (2) listed companies on the Athens Stock Exchange for the years ended 31.12.2017 & 30.6.2019. The results of the Supervisory Authority's inspections were communicated to the audit staff and corrective actions and action plans were developed.

In July 2024, the Supervisory Authority conducted a quality review on the audit work file of one (1) listed company for the fiscal year 2023.

The final report of findings from HAASOB is pending.

In March 2025, the Supervisory Authority conducted a thematic quality control review of the audit file (assurance report) of one (1) company listed on the Athens Stock Exchange.

The final report of findings from HAASOB is pending.

In December 2016, the Institute of Certified Public Accountants of Greece conducted a quality review regarding non-listed entities engagements.

The results of the quality reviews conducted by supervising authorities are assessed by the Quality & Risk Management Department to provide the basis for on-going improvement of quality controls. In addition, the results of the quality reviews are communicated to the company's assurance staff so that they are aware of the findings and the corrective actions planned.

As from 16/05/2006, the Company is also registered in the Public Company Accounting Oversight Board (PCAOB) but no quality inspections have been conducted so far.

# Human Resources & CPDs

## Human Resources

The Human Resources Department is responsible for dealing with issues pertaining to the Company's employees such as:

- complying with the Greek labour law
- shaping the Company's culture and promoting job satisfaction
- handling all issues involving its employees within the framework of the policy, methodology and keeping records
- conducting the prescribed procedures of recruitment/ staff leaving
- managing professional personnel development and appraisal
- managing personnel training and development
- setting remuneration policy and incentives (payroll is a responsibility of the Accounts Department)
- managing labour relations and resolving compliance issues
- adopting policies for balancing professional and personal life
- managing practices related to employee health and safety
- adopting Diversity, Equity, and Inclusion Strategy and Policy
- managing Corporate Social Responsibility and volunteering activities

## Personal Development

### Service Lines Ranking

Personnel ranking is as follows:

- Partner
- Principal
- Director
- Senior Manager
- Manager
- Supervisor
- Senior
- Associate
- Assistant

### Business Support Ranking

- Head
- Director
- Manager
- Specialist
- Associate

- basic attributes (personal, professional or client service abilities) that are assessed as critical to the role and their level in the Company

- professional objectives set by the responsible Counselor in the beginning of the reporting period.

The performance appraisal procedure is aligned with the values of Grant Thornton. It enables both the Counselee and the Counselor to define the objectives for the forthcoming period that will assist a Company member or a Partner to enhance their various personal skills.

The performance appraisal procedure also constitutes a basis for professional development and enables the appraisees to record their opinions their role and long-term ambitions in the course of their professional growth.

All employees shall complete at least one appraisal annually. The performance appraisal procedure comprises:

- Annual Appraisals for all employees
- Project Appraisals, after completion of specific projects, for all the project team members by the involved Supervisors, Managers, Senior Managers, Directors and Partners
- "Upward Project Appraisals" from the project team members to project managers
- Counselors' appraisals of counselors by counselees on the criteria of coaching, support and motivation

Performance appraisal criteria are fully aligned with our Strategy for 2025 and its 5 pillars (Strategic Capabilities, People & Culture, Brand, Quality & Risk, Operational Transformation).

## Appraisal

### Performance Appraisal

The performance appraisal procedure constitutes a significant element of the efficiency of managerial performance of the company. It constitutes a platform for every partner and Company members so that they could be informed about their performance concerning the following issues:

### Partners Appraisal

Partners are evaluated by Partners of the higher ranks. Their appraisal criteria are also based on our Strategy for 2025.

### Remuneration Policy

The Company's remuneration policy includes:

- monthly wage

- bonus
- long-term earnings (pension scheme)
- educational incentives in the form of allowances (for successful fulfillment of professional exams)
- benefits (company car, food vouchers, healthcare coverage, travel expenses, etc.)

The Company's Internal Regulations provide a transparent framework for determining the remuneration & bonus of executives at all levels, based on meritocratic criteria, aiming at the formation of a mentality oriented towards the upgrading of the quality of the services provided. These criteria are aligned with our Strategy for 2025 and its 5 pillars (Strategic Capabilities, People & Culture, Brand, Quality & Risk, Operational Transformation). All Company members, who are appraised regardless of their ranking, are entitled to participate in the Company's profits in the form of a bonus. The Company also provides additional insurance coverage for all its employees.

- approval for attending the Global programs of GTIL (Senior Leadership Program, Exceptional Coach Program, Advanced Leader Program, Emerging Leaders Program)

In addition to the above regular seminars, many special seminars are held both in Greece and abroad, which are not included in the initial annual planning.

The Human Resources Department is responsible for the successful and effective conduct of seminars, keeping participation and program evaluation forms, and maintaining the corresponding databases with detailed information on all training programs attended in the previous year, as well as the progress and results of professional examinations.

The Human Resources Department is also responsible for maintaining records of all training material and ensuring its availability. The aim is to make training material available to all employees, even those who do not participate in these programs.

The Human Resources Department collaborates with the other committees and departments (Quality & Risk Management, Methodology & Technology, Assurance Risk & Performance Assessment) to identify training needs, plan and continuously improve seminars and training programs

In FYs 2024-2025, 84 different training sessions were held (intracompany seminars), 19 of which related to a new topic/subject. The total number of training hours for all employees was 29.290,50 hours.

We get significant information on the quality of the trainings carried out from the evaluations performed at the end of every program. The seminar evaluations showed that 89% of participants were very satisfied with the training courses and 91% were very satisfied with the quality of the seminars.

## Personnel training

### The Company's policy

Once hired and before assuming their roles, new employees receive special training (induction training) on the Company's Code of Conduct, policies, and quality assurance procedures. In addition, all employees receive annual training on changes to the Company's policies and procedures.

### Preparation & implementation of training programs

The individual training and educational needs of each Company member are defined through the general educational needs determined by the Human Resources Department and the Head of each Department.

The following are taken into account:

- needs imposed by the market and opportunities presented in respect of new services
- results of previous years' Quality Reviews conducted by the Company's Quality Control Committee, by GTIL, or by another controlling body
- standards and seminars defined by our regulatory authorities

The result of the aforementioned actions is a core planning of seminars and training programs that are to be attended by our people. The core planning is prepared at the beginning of the year and pertains to the period of the next 12 months organized as follows:

- program of inter-corporate seminars conducted in the Company by adequately trained professionals of Grant Thornton Greece, GTIL and market executives
- program of long-term attendance of professional courses leading to obtaining professional qualifications such as: SOEL Training Program, GTIL training programs, ACCA, ACA, CIA, CFA, CISA, CISM, Vocational Training and Lifelong Learning Center of AUEB

### Continuous Professional Development - CPD

The Company's ability to provide quality services to its clients depends on the skills and professional experience of its Partners and other executives. The Company expects all of its employees to maintain a satisfactory professional level at all times while performing their duties.

Through its policies, the Human Resources Department ensures an effective and timely training of employees and keeps records to monitor compliance with the requirements of the revised International Education Standard IES 7 "Continuing Professional Development" of the International Federation of Accountants (Redrafted) of International Accounting Education Standards Board (IAESB) - International Federation of Accountants, IFAC), as well as Article 12 of Law 4449/2017, which incorporates the requirements of Directive 2006/43/EC, as the above directive applies after its amendment by Directive 2014/56/EU and in accordance with Regulatory Act 001/2024 (Greek Government Gazette Issue B 1256/14.03.2025) of the HAASOB Board of Directors. The operation of the above training

policies and procedures is evaluated and audited as part of the annual audit program, which is carried out at the company by the Quality & Risk Management department as part of the ISQM1 compliance audit.

# Corporate Responsibility and Sustainable Development

At Grant Thornton, sustainable development is our strategic priority and determines the way we create value for our clients, our people, our partners, and society as a whole. We recognize that our impact extends far beyond the boundaries of our own operations, positively influencing the course and performance of the organizations that place their trust in us.

Our strategy focuses on collaboration, continuous improvement, innovation, and the development of our people. We invest in their expertise, skills, and talent, while sharing best practices and strategies with our clients that enhance their resilience and sustainability. In this way, we actively contribute to the progress of the economy and society.

We have established a Sustainable Development Committee to manage ESG issues more effectively. At the same time, through working groups, we are strengthening the regular implementation of actions in priority areas in the environmental, social & human resources, and corporate governance pillars. We have proceeded to identify material issues based on international Sustainability Standards in order to fully align with the requirements of the CSRD Directive.

## We focus on responsible operation and development

Sustainable development values are at the heart of Grant Thornton's business strategy. In particular:

- Responsible operations: We provide high value-added services that enhance the sustainable development of our clients, while selecting and evaluating our suppliers based on social, economic, and environmental criteria.
- Human capital: We recognize human resources as the most important factor for success and implement comprehensive development systems, offering opportunities for personal and professional growth through targeted training and empowerment programs.
- Business ethics and transparency: We adopt strong corporate governance structures and operate with integrity, enhancing transparency and stakeholder trust and confidence.
- Environmental responsibility: We implement actions to reduce our environmental footprint through energy and water conservation, emission reduction, and recycling programs.
- Social contribution and action: We support social initiatives and vulnerable groups, by actively participating in volunteer activities and social contribution programs.



This way, Grant Thornton combines its role as a trusted partner with the responsibility of an organization that recognizes and reinforces its positive impact on society and the environment. For us, sustainability is not only a strategic goal, but also a lever for growth and value creation, both for our clients and for future generations.

# Our vision and culture

Grant Thornton is committed to remaining true to its values and supporting dynamic businesses in unlocking their growth potential. We are driven by our vision and our ongoing goal of creating added value for all stakeholders. In this context, we have adopted and implemented a Sustainability Policy based on international standards and best practices.

**Our vision:** To become the leading consultant to the world's most dynamic organizations, empowering our clients to unlock their potential for growth.

We support our CLEARR (Clarity, Leadership, Excellence, Agility, Respect, and Responsibility) values, both on an individual and collective level. These values guide how we

collaborate, lead, pursue excellence, adapt to change, show respect, and take responsibility.

The CLEARR values are reinforced through the resources, benefits, and opportunities we provide to our people. Through these, we are committed to creating an environment where everyone feels welcome, supported, and empowered to exceed their expectations.



## Our contribution to the UN Sustainable Development Goals

The Company is committed to promoting the 10 principles of the UN Global Compact (UNGC) and contributing to the achievement of the 17 Sustainable Development Goals (SDGs). In addition, Grant Thornton participates in the local UNGC Hellas network and, through its actions, actively contributes to the implementation and promotion of these goals and principles.



## Sustainable Development Goals 2030

## Relevant targets per Global Goal

## Our contribution

	<ul style="list-style-type: none"><li>Target 3.5</li></ul>	<p>Our main concern is promoting the health of our employees, partners, and their families. For this reason, we have established a certified health and safety system. Our commitment to protecting the emotional and mental health of our people is reflected in our «Counseling Support Line,» which we offer in collaboration with a specialized external partner. The service is available 24 hours a day, 7 days a week, offering immediate and confidential support to those who wish to share a concern or receive guidance in managing personal and professional issues. At the same time, the Company has introduced four-day working weeks during August, giving all employees an extra day off every Friday, thereby promoting a better work-life balance. Furthermore, as part of our holistic approach to health and well-being, we offer all employees with nutritionist services, supporting the adoption of healthy habits and enhancing their daily well-being.</p>
	<ul style="list-style-type: none"><li>Targets 4.3, 4.5, 4.7</li></ul>	<p>We incorporate the value of lifelong learning into our daily operations through a variety of internal and external training programs and seminars. The continuous development of our people's skills is an investment in both their personal and professional growth, as well as in providing high-quality services that lead to excellence and increased client satisfaction. Our Company offers full funding for internationally recognized certifications (e.g., ACCA, ACA, CFA), educational leave, partnerships with universities and educational institutions, as well as internships for undergraduate and postgraduate students and graduates. Through our Training Policy, we ensure that each training program is aligned with our objectives, enhancing both individual performance and the collective success of the organization. In addition, at Grant Thornton we implement an annual training program for all employees, which focuses on the Company's policies, codes of conduct, and key operating principles. In this way, we ensure the understanding and application of common values, strengthen corporate culture, and cultivate an environment of integrity, transparency, and responsibility.</p>
	<ul style="list-style-type: none"><li>Targets 5.1, 5.2, 5.5, 5.9</li></ul>	<p>We promote gender equality and offer equal opportunities to all, with zero tolerance for any form of gender discrimination. Our commitment is also reflected internationally through the annual "Women in Business" survey, which we have been conducting for 20 years, recording the progress of female leadership worldwide. At the same time, we are strengthening our institutional commitment to equality and the creation of a fair and meritocratic working environment by signing the Diversity Charter and collaborating with organizations such as "Women On Top". We rely on the professional skills, abilities, and experience of our people. We recognize and actively promote the importance of women in senior management positions. A prime example of our practice is the high number of women in our total workforce and in management positions. The meritocratic working environment we offer provides unlimited opportunities for the continuous development and promotion of women's skills and abilities at all levels of the organization. The year 2024 was the second consecutive year that our Company actively participated, through its executives, in the UN Global Compact's Target Gender Equality working group, strengthening the promotion of gender equality and the advancement of women in leadership roles.</p>

	<ul style="list-style-type: none"><li>Targets 8.2, 8.3, 8.5, 8.8</li></ul>	<p>We set solid foundations and values through all our policies and procedures. We consistently grow our human capital and invest in our people, our most important asset. We are committed to promoting inclusive economic growth and providing decent work for all.</p> <p>Every year, we increase the number of jobs we offer, thereby contributing to the productive employment of more people, with a particular focus on younger age groups.</p> <p>Providing a safe working environment with opportunities for continuous development is a priority for us. We communicate with everyone and incorporate actions to protect health and safety at work, and we offer access to quality healthcare and medical care in collaboration with reputable medical centers. In addition, our consulting services enable businesses to adopt sustainable practices, optimize their operations, and create employment opportunities, thereby contributing to the broader economic development of the communities we serve. Our commitment to the 2030 Global Sustainable Development Goal is an integral part of our business strategy and is embedded in our culture.</p> <p><b>For the third consecutive year, in 2024, Grant Thornton received a major distinction and certification for its workplace and was included in the Great Place to Work® list through its participation in the annual Workplace Trust Index© survey.</b></p>
	<ul style="list-style-type: none"><li>Targets 10.2, 10.3, 10.4</li></ul>	<p>At Grant Thornton, we believe that Diversity, Equity, and Inclusion (DEI) is a strategic priority. Through our DEI Committee and our three-year policy and action plan, we foster a workplace free from all forms of discrimination, where all people can express themselves freely and develop equally. Our strategy focuses on six key pillars:</p> <ul style="list-style-type: none"><li>• Diverse Ability</li><li>• Gender Equality</li><li>• Family</li><li>• LGBTQIA+</li><li>• Ethnicity &amp; Culture</li><li>• Social-economic status</li></ul> <p>To implement these actions, we collaborate with organizations such as Mexoxo and Include, while in 2024 we established the DEI Ambassadors volunteer group, which actively contributes to the implementation of the strategy and the creation of a positive social footprint.</p> <p>At the same time, Grant Thornton has signed the Diversity Charter for Greek companies and participates in international initiatives, such as the annual Global Women in Business survey, which tracks the progress of female leadership worldwide.</p> <p>In this way, we contribute significantly to reducing inequalities, strengthening social cohesion, and promoting a culture of mutual respect, acceptance, and equal development.</p>

Sustainable Development Goals 2030	Relevant targets per Global Goal	Our contribution
	<ul style="list-style-type: none"> <li>Targets 12.2, 12.5, 12.6, 12.8</li> </ul>	<p>Our Company has established an Environmental Management System that ensures the regular monitoring and improvement of our environmental performance. At the same time, through our services and cooperation with clients and suppliers, we promote responsible consumption and production, enhancing the dissemination of good practices and creating a positive environmental footprint throughout the value chain.</p> <p>Regarding waste management, our goal is to continuously increase recycling and reduce waste production by adopting practices that limit paper use, such as online file sharing and access from any device. Our offices are equipped with collection stations for small electronic devices and batteries, which are delivered to a licensed operator for safe and responsible management.</p>
	<ul style="list-style-type: none"> <li>Target 13.2</li> </ul>	<p>Grant Thornton has adopted certified Environmental Management Systems for energy management.</p> <p>Our goal is to reduce our environmental footprint through regular monitoring of greenhouse gas (GHG) emissions generated by our activities. We also provide training and raise awareness among our employees, encouraging them to adopt responsible environmental behavior.</p> <p>Similarly, our consulting services are designed to help companies identify their environmental impact and develop strategies to reduce their GHG emissions. We actively promote the adoption of sustainable practices that contribute to climate change resilience and/or mitigation.</p>

## Sustainable Development Goals 2030

### Relevant targets per Global Goal

### Our contribution



- Targets 16.6, 16.7, 16.10

At Grant Thornton, our commitment to good corporate governance and transparency in all our activities and management is a daily priority. The Company's smooth operation, based on international best practices, specific procedures, and effective risk management, contributes to the achievement of our strategic goals and effective organization.

Our strategy is based on respect for and promotion of human rights, which are fundamental to the creation of fair, inclusive, and resilient organizations. For this reason, we publish Sustainability Reports and participate in the UN Communication on Progress (CoP) initiative, ensuring that all stakeholders are kept informed. Grant Thornton has established a Sustainable Development Committee, consisting of representatives from various departments, in order to enable further continuous improvement actions. The Committee meets regularly and reports to the Company's Senior Management.

At the same time, our consulting services help companies adopt solutions that are in line with international standards of sustainability, corporate governance, and responsibility.

Grant Thornton follows certified quality and governance standards, has an Internal Control System in place, and complies with the strict controls of its international network. In addition, we implement relevant anti-bribery policies, reinforcing the framework of integrity, responsibility, and accountability.

In this way, we contribute significantly to promoting strong institutions, safeguarding human rights, and strengthening stakeholder trust and confidence.



- Targets 17.6, 17.8

Our goal is to actively participate in collaborations and partnerships as a means of exchanging know-how and experience. We make the most of every opportunity to participate in networks, organizations, bodies, associations, and unions of sectoral or broader business interest, in order to exchange know-how, ideas, and best practices.

Particularly in the area of Corporate Responsibility and Sustainability, we actively participate in cooperation networks such as CSR Hellas, the Global Compact Network Hellas, and the Hellenic Federation of Enterprises Business Council for Sustainable Development (SEV BCSD), closely monitoring trends and developments and supporting the achievement of the UN Sustainable Development Goals. In fact, Grant Thornton Greece has been a Participant in the UN Global Compact since 2013, while our executives actively participate in working groups on specific topics such as human rights and gender equality.

At the same time, through our collaboration with the international network of Grant Thornton, active in almost every country in the world, we support our clients' strategic plans and promote the achievement of SDGs globally, jointly developing solutions to today's challenges.

In order to ensure the optimal execution of all of the aforementioned initiatives, and to enable further continuous improvement actions, the Company has established and operates an ESG Committee, which consists of representatives from various departments. The Committee meets regularly and is accountable to the Company's Senior Management.

## Participation in the Hellenic Network for CSR - CSR Hellas

Grant Thornton is a member of the CSR Hellas Network and actively participates in working groups promoting corporate responsibility practices in modern business. In addition, the Company participates in the Board of Directors of CSR Hellas, following the election of one of its executive members as a member of the BoD. CSR Hellas is the national partner of CSR Europe and its mission is to promote the principles and practical applications of responsible entrepreneurship in order to strengthen sustainability, innovation, and social cohesion at national and local level.



## Participation in the UN Global Compact Network Greece - UNGCNG

Grant Thornton has adopted the 10 principles of UN's Global Compact, since our Company shares the belief that corporate practices based on global principles contribute to responsible growth, and help build prosperous and thriving societies. In particular, we are among the founding members of UNGCNG, while an executive of the Company has been elected to and participates in the Board of Directors of this organization. UNGCNG is one of the 70 Global Compact Networks around the world.

As a participant in the United Nations Global Compact since 2013, Grant Thornton publishes its annual performance (CoP) and monitors its progress on Sustainable Development issues.

Communications are available on the Global Compact website

(<https://unglobalcompact.org/what-is-gc/participants/18998-Grant-Thornton-Greece>)



## Participation in the Hellenic Federation of Enterprises Business Council for Sustainable Development - SEV BCSD

Grant Thornton has been a member of the SEV BCSD since the beginning of 2022.

This Council aims to promote sustainable development in the Greek business world and to facilitate the dialogue required to discuss and assess critical sustainable development issues between businesses, the State, and society in general.

## SEV BCSD participates in the World Business Council for Sustainable Development.



# Adopting the 10 Principles of the UN Global Compact

Principles*	Policies and Actions	Systems and Procedures
Principles 1 and 2	<p><b>A. Human Rights</b></p> <ul style="list-style-type: none"> <li>• Updated rules of internal procedures</li> <li>• Code of Conduct</li> <li>• Whistleblowing policy</li> <li>• Policy for preventing and eliminating harassment and violence in the workplace</li> <li>• Signature of the Diversity Charter for Business</li> <li>• DEI Policy</li> <li>• Sustainability Policy</li> </ul>	<p>The Company ensures respect for human rights and provides equal employment opportunities. Grant Thornton takes all the necessary measures to protect internationally proclaimed human rights and does not accept any form of discrimination. Moreover, Grant Thornton applies relevant procedures, based on 100 non-discriminatory criteria (such as products and performance) in matters of recruitment, remuneration and promotion. Such criteria are not linked to any form of discrimination on the grounds of sex, nationality, age, marital status and other characteristics.</p> <p>By signing the Diversity Charter, Grant Thornton upholds its commitment to ensuring an equal opportunity workplace that respects the diversity of its employees, promotes and enhances the unique characteristics of each individual, combats all forms of discrimination and provides appropriate information and training to employees on diversity and inclusion issues.</p>
Principles 3,4,5 and 6	<p><b>B. Labour</b></p> <ul style="list-style-type: none"> <li>• Internal Regulations</li> <li>• Code of Conduct</li> <li>• Whistleblowing policy)</li> <li>• Policy for eliminating harassment and violence in the workplace</li> <li>• Counseling</li> <li>• Training Policy</li> <li>• Performance management policy</li> <li>• Health and Safety Policy</li> <li>• Employee development Policy</li> <li>• Remuneration and Benefits Policy</li> <li>• Covid-19 Protection policy</li> <li>• EAP Program - 24/7 Support line</li> <li>• Annual and special leaves Policy</li> <li>• Work-from-home Policy</li> <li>• Employee Training Policy</li> <li>• Corporate car Policy</li> <li>• Sustainability Policy</li> </ul>	<p>At Grant Thornton, the climate of mutual respect, cooperation, and teamwork is reinforced at every level and rank of the hierarchy. Beyond compliance with relevant employment legislation, we adopt best practices in all aspects of our employment policy, aiming to maintain our corporate culture characterized by equal opportunities, skills development and continuous training, and the fulfillment of all employees' goals. With regard to recruitment, remuneration, benefits, promotions, and training, we apply specific procedures with impartial criteria that are free from any form of discrimination, as we are committed to promoting all human and labor rights.</p> <p>We also encourage communication and open dialogue between management and employees, as well as among all employees. The Company strictly complies with Greek and European legislation and provides full assurance of collective labor agreements.</p>

Principles*	Policies and Actions	Systems and Procedures
Principles 7,8 and 9	<p><b>C. Environment</b></p> <ul style="list-style-type: none"> <li>Internal Regulations</li> <li>Paper packaging and electrical devices recycling program</li> <li>Actions to reduce electricity consumption with the aim of reducing greenhouse-gas emissions</li> </ul>	<p>Our priority is to raise awareness on climate change and the impact of modern economic activity on the natural environment. We support our partners and clients in recording and monitoring their environmental impact. Since our Company has a limited impact on the natural environment, the actions we take are focused on reducing energy consumption and recycling paper and other materials.</p>
Principle 10	<p><b>D. Anti-Corruption</b></p> <ul style="list-style-type: none"> <li>Anti-bribery Policy</li> <li>Internal Regulations</li> <li>Code of Conduct</li> <li>Whistleblowing policy</li> <li>Quality Management Manual (QMM)</li> </ul>	<p>Developing practices that promote transparency and combating all forms of corruption are key elements of Grant Thornton's activities.</p> <p>In addition, Grant Thornton is certified according to ISO/IEC 27001:2013, an international standard that specifies the requirements for an Information Security Management System (ISMS). ISO/IEC 27001:2013 is the only international standard that can be audited and which specifies the requirements for an Information Security Management System (ISMS).</p>

# Stakeholder engagement and response

Grant Thornton is committed to engaging in a consistent and meaningful dialogue with all stakeholder groups, considering any individual or group that influences or is influenced by its activities as a stakeholder. Our goal is to understand and respond to the expectations and key concerns of each stakeholder group through a strategic action plan that incorporates their needs and requests.

Continuous communication and regular recording of issues raised through dialogue with stakeholders is one of the key mechanisms for improving our services and procedures. At the same time, it is an integral part of our culture. The following sections outline Grant Thornton's main communication channels with each stakeholder group, as well as the most important issues arising from this engagement.

## Communication channels with the stakeholders & key issues/expectations

### Clients

#### Communication channels

- client satisfaction survey
- continuous direct and telephone communication
- company website
- newsletters (Advisory, IFRS, Tax, TAS, Financial Insights)
- surveys conducted by Grant Thornton
- events, conferences, and lectures
- annual Transparency Report
- training seminars

#### Key issues / expectations

- response to specific requirements and needs, provision of tailor-made services
- information events on specific topics (IFRS, Tax, CSR, etc.)
- timely and reliable project execution
- post-project support
- consulting on regulatory or operational risks

### Employees

#### Communication channels

- constant communication between Management and employees
- open-door policy
- employee appraisal system
- employee surveys
- specialized meetings
- updates via email
- regular newsletters
- company intranet (SharePoint)
- whistleblowing Policy
- employee well-being events and activities
- CSR activities and employee volunteering
- specialized working groups

#### Key issues / expectations

- training and development
- professional development
- equal opportunities
- additional benefits
- flexible working (hybrid model)

## Shareholders

### Communication channels

- annual Financial Statements
- annual Transparency Report
- events and panels
- publication of CoP Report
- scheduled and ad hoc meetings

### Key issues / expectations

- economic growth
- Corporate Governance
- Transparency
- Risk Management

## Suppliers & Associates

### Communication channels

- contact with the company's executives
- supplier management by category
- contact through the accounts dept. for financial matters

### Key issues / expectations

- compliance with the terms of payment
- continuous collaboration and communication
- meritocratic / objective assessment

## Grant Thornton Network

### Communication channels

- participation in the network committees
- personal contact with executives
- regular emailing
- communication between departments and teams regarding proposals and projects
- training and educational events
- specialized meetings for exchange of information and knowledge

### Key issues / expectations

- profitability
- exchange of know-how
- participation in projects and proposals

## Supervisory Authorities

### Communication channels

- corporate or individual participation in various organizations and chambers
- participation in CSR Hellas, a national partner of CSR Europe
- participation in the UN Global Compact Network Greece - UNGCNG
- participation in the SEV Business Council for Sustainable Development
- Participation in conferences and events organized by State and institutional bodies
- Participation in surveys and public consultations conducted by institutional bodies

### Key issues / expectations

- compliance with applicable legislation and regulations
- supporting government actions and programs
- responding promptly to the financial demands of the State

## Community & NGOs

### Communication channels

- participation in activities organized by local organizations and associations (employee volunteer days)
- communications, press releases, and reports

### Key issues / expectations

- collaboration & financial support of NGOs
- addressing the issues of local communities (e.g., aid of associations)

# Our human resources

We consider human resources to be a key factor in the success of our business. We aim to be a model company in terms of working environment, where our people are proud to be part of.

We comply with the relevant labour law, adopt best practices, and ensure that our reward strategies promote fair and equal opportunities. We are committed to developing a culture where everyone is given the opportunity to develop their skills and knowledge and enjoy the fulfillment of their goals.

During the reporting period 01/07/2024 - 30/06/2025, Grant Thornton employed 1.403 people, 671 of whom were women (48%), while women accounted for 50% of the Company's Management Committee.

Employees with secondary and higher education accounted for 94%, while those with postgraduate studies/professional certifications accounted for 58%. Employees belonging to ethnic minorities account for 1% of the headcount, while employees coming from non-metropolitan areas account for 12%. 24% of Grant Thornton's executives have been with the firm for more than five years.



48%

of the executives  
are women



94%

of the executives  
have secondary  
and higher studies

## The key development strategies include:

- Training and Development: our Company relies on the skills and experience of our people, which is why we invest heavily in their training and development. However, we acknowledge that our people have different needs and that developing innovative opportunities for them is a continuous process. The Company provides a multitude of career opportunities so that our people can develop within the organization in the way they choose.
- Performance management and reward system (allowances, benefits, and bonuses): we have developed systems that are fully tailored to our Company's needs, which promote the achievement of corporate strategic goals and reward the performance of our executives through promotions and salary increases (fixed remuneration), bonus distribution (variable remuneration), pension scheme (long-term remuneration), and a wide range of benefits such as medical insurance, cars, etc.
- Health and Safety: We provide a safe working environment and ensure that our people are well informed and aware. We operate in a smoke-free environment and work with an occupational physician. Our premises are regularly inspected by a safety technician. In addition, we provide accident coverage under a group insurance policy for the personnel of the departments involved in our clients' projects. As a result, Grant Thornton was awarded the Health & Safety Awards 2022 for providing guidance and support to employees to



improve their daily lives, focusing on their physical and mental well-being, and generally creating a pleasant and safe working environment.

- **Equality and inclusion:** Safety at work is not just physical. Grant Thornton places particular emphasis on creating and fostering a working environment that offers equal opportunities to all, free from discrimination and exclusion. Equality and inclusion are key strategic priorities, which is why we have developed our Diversity, Equality, and Inclusion (DEI) Strategy and Policy, setting out actions and clear objectives on how we will further support inclusion and equal treatment for all within our daily work life. We have received important awards, such as the "Best Workplace For Women" Award in Greece for the third consecutive year, and we have signed the "Diversity Charter" and are committed to ensuring that all our business operations are inclusive. In this context, we have received the "SHARE" equality label, which reflects the practical promotion of practices and initiatives aimed at gender equality. Grant Thornton's successful response to the evaluation criteria of the Independent Evaluation Committee is proof that we are committed to providing a working environment of equal opportunities and remuneration for our people

## We are a BEST Workplace

Grant Thornton was named one of Greece's ten best companies in the "Best Workplaces Hellas 2025" category for companies with 1.000-2.000 employees. This was a year full of awards from Great Place to Work® Hellas: third consecutive year as Great Place to Work®, first time as Best Workplace in Professional Services & Consulting Hellas, third consecutive year as Best Workplace for Women Hellas.

These awards are particularly important to us because they honor our people and reflect their commitment and support for our strategies. Our people have always been the focus of our efforts and, together, we strive to create the working environment of tomorrow through their suggestions and ideas, fulfilling our promise to "Go Beyond. Move forward together"



# Health & Safety

## “Setting our Health as our first priority”

Health and safety of our people is paramount to Grant Thornton.

The Company recognizes its responsibility for a safe working environment and its continuous improvement and implements an integrated Health & Safety Management System. Through this System the Company ensures full compliance with applicable laws and regulations while simultaneously recognizing, managing, and monitoring the occupational risks related to the physical and mental health of its employees, partners and its visitors.

Ensuring the health of our people, our associates and society in general is undoubtedly a major concern for us at Grant Thornton.

Grant Thornton has developed a Health & Safety policy in order to facilitate the management of risks related to its business and to plan the firm's activities in order to continuously improve Health & Safety conditions.

### Our People:

- full compliance with Occupational Health and Safety as defined by legislative and other requirements
- providing information and training to employees through first aid seminars and the annual mandatory “Health & Safety” webinar, which help to create a prevention mindset and increase awareness
- establishing emergency teams
- annual evacuation exercise
- ergonomic workplaces
- systematic provision of information on the ways of prevention and protection of employees and their families
- EAP Program - 24/7 Psychological Support Help Line for our people and their families
- preventive disinfection of workplaces on a weekly basis
- intensification of daily cleaning in the workplace, by hiring additional staff
- providing Personal Protective Equipment (PPE) when required for work on client premises

### Our Associates:

Grant Thornton has developed, completed, and tested a Disaster Recovery Plan, as well as a Business Continuity Plan, certifying the ability of the existing IT infrastructure to cope with an extraordinary and universal need for remote work of our executives as well as to address potentially increasing cyber-attacks. Grant Thornton's risk management team is closely monitoring developments and is ready to take any additional action that may be needed, if deemed necessary.

Furthermore, our employees possess the necessary skills and information infrastructure to work remotely and continue their project as long as it does not require their physical presence at the client's premises or access to documents and information. In such cases, documents and information may be sent electronically, subject to force majeure events.

# Financial information

## Analysis of turnover per service:

Services	1/7-30/6/2025 Grant Thornton S.A. Chartered Accountants Management Consultants	1/7-30/6/2025 Grant Thornton Business Solutions S.A.	TOTAL 1/7- 30/06/2025
Revenue from statutory audits of annual and consolidated financial statements of Public Interest Entities (PIEs) and entities, belonging to a Group of Companies, whose parent company is a PIE, (a)	7.631.352		7.631.352
Revenue from statutory audits of annual and consolidated financial statements of other entities (b)	14.914.066		14.914.066
Revenue from rendering non-prohibited, non-audit services to audited entities by the firm (c)	4.286.548	6.483.863	10.770.410
Revenue from rendering non-mandatory audit services entities to which no statutory audit services are provided (d)	4.802.355	45.412.256	50.214.611
<b>TOTAL (a+b+c+d)</b>	<b>31.634.321</b>	<b>51.896.119</b>	<b>83.530.439</b>
Services	1/7/2023-30/6/2024 Grant Thornton S.A. Chartered Accountants Management Consultants	1/7/2023-30/6/2024 Grant Thornton Business Solutions S.A.	TOTAL 1/7/2023- 30/06/2024
Revenue from statutory audits of annual and consolidated financial statements of Public Interest Entities (PIEs) and entities, belonging to a Group of Companies, whose parent company is a PIE, (a)	7.409.975		7.409.975
Revenue from statutory audits of annual and consolidated financial statements of other entities (b)	12.891.717		12.891.717
Revenue from rendering non-prohibited, non-audit services to audited entities by the firm (c)	3.058.448	4.268.483	7.326.931
Revenue from rendering non-mandatory audit services entities to which no statutory audit services are provided (d)	3.391.028	39.403.368	42.794.396
<b>TOTAL (a+b+c+d)</b>	<b>26.751.167</b>	<b>43.671.852</b>	<b>70.423.019</b>

Our Company has prepared its financial statements based on the International Financial Reporting Standards (IFRS) in order to present an integrated picture of its financial position, the financial performance and cash flows.



# Public Interest Entities

The total of our statutory audit clients in the fiscal years 2023 & 2024 that are Public Interest Entities (PIEs) is presented below. The relative services objective was the audit of annual financial statements and review of six-months period financial statements of the entities listed below:

S/N	Company Name	Fiscal Year 2023	Fiscal Year 2024
1	ALPHA TRUST HELLENIC EQUITY S.A.	X	X
2	ALPHA TRUST HOLDING S.A.	X	X
3	ALPHA TRUST-ANDROMEDA S.A.	X	X
4	ATTICA BANK S.A.	X	X
5	ATTICA HOLDINGS S.A.	X	
6	CENTRIC HOLDING S.A.		X
7	FLEXOPACK S.A.	X	X
8	FOURLIS HOLDING S.A.		X
9	INTERLIFE S.A.	X	
10	INTRAKAT S.A.	X	X
11	JUMBO S.A.	X	
12	LAVIPHARM S.A.	X	X
13	MARFIN INVESTMENT GROUP HOLDING S.A.	X	
14	MEVACO S.A.	X	X
15	REVOIL S.A.	X	X
16	UNIBIOS HOLDING S.A.		X
17	YALCO - KONSTANTINOU S.A.	X	X
18	AVAX S.A.		X
19	SPIROU S.A.	X	X
20	AKRITAS S.A.	X	
21	ALUMIL S.A.		X
22	ATTIKES EKDOSEIS S.A.	X	X
23	BIOKARPET S.A.	X	
24	KRI KRI S.A.	X	X
25	VOGIATZOGLOU S.A.	X	X
26	GEK TERNA HOLDINGS S.A.	X	X
27	DIOS PLASTIKA S.A.	X	X
28	DOMIKI KRITIS S.A.	X	X
29	PAIRIS E. S.A.	X	X
30	ELLACTOR S.A.		X
31	ATHEX S.A.	X	X
32	ELTON S.A.		X
33	EYDAP	X	X
34	EUROPE S.A.		X
35	ATHENS MEDICAL S.A.	X	X
36	IKTINOS HELLAS S.A.	X	
37	INTERTECH S.A.	X	

S/N	Company Name	Fiscal Year 2023	Fiscal Year 2024
38	INTRACOM HOLDINGS S.A.	X	X
39	INTRALOT S.A.	X	
40	KARELIAS S.A.		X
41	LOULIS S.A.		X
42	MYTILINEOS GROUP S.A.	X	
43	NEW POSIDON S.A. (NP INSURANCE)		X
44	IDEAL GROUP S.A.	X	X
45	PANCREAT BANK COOPERATIVE	X	X
46	PAPAPANAGIOTOU S.A.- DROMEAS	X	
47	PAPOUTSANIS S.A.	X	X
48	PLASTIKA KRITIS S.A.	X	X
49	SIDMA S.A.	X	
50	BANK OF THESSALY	X	X
51	TRADE ESTATES S.A.		X
52	TERNA S.A.	X	X
53	TERNA ENERGY S.A.	X	
54	TERNA ENERGY SINGLE MEMBER S.A.	X	X
55	TECHNICAL OLYMPIC S.A.	X	
56	FAIS HOLDING S.A.	X	X
57	CHAIDEMENOS S.A.	X	

# Auditing Firms in EU and EEA

Disclosures under Article 13.2 (b) of Regulation (EU) No 537/2014 of the European Parliament

EU/EEA - Member state	Auditing Firm Title
Austria	Grant Thornton ALPEN-ADRIA Wirtschaftsprüfung GmbH
Austria	Grant Thornton Austria GmbH
Belgium	Grant Thornton Bedrijfsrevisoren
Bulgaria	Grant Thornton Bulgaria
Croatia	Grant Thornton revizija d.o.o.
Cyprus	Grant Thornton (Cyprus) Ltd
Czech Republic	Grant Thornton Audit s.r.o.
Denmark	Grant Thornton Statsautoriseret Revisionspartnerselskab
Estonia	Grant Thornton Baltic OÜ
Finland	Advico Finland Oy
Finland	Grant Thornton Oy
France	AEG FINANCES
France	CARIB AUDIT & CONSEIL
France	GRANT THORNTON
France	GRANT THORNTON AUDIT
France	IGEC
France	TUILLET AUDIT
Germany	ATS Allgemeine Treuhand GmbH
Germany	Grant Thornton AG
Germany	Trinavis GmbH & Co. KG
Germany	WPG Wohnungswirtschaftliche Prüfungs- und Treuhand GmbH

EU/EEA - Member state	Auditing Firm Title
Greece	Grant Thornton S.A.
Hungary	Grant Thornton Audit Kft.
Iceland	Grant Thornton endurskoðun ehf
Ireland	Grant Thornton
Ireland	Grant Thornton Business Advisory Services Ltd
Italy	Ria Grant Thornton Spa
Latvia	Grant Thornton Baltic Audit SIA
Liechtenstein	Grant Thornton AG, Schaan
Lithuania	Grant Thornton Baltic UAB
Lithuania	Grant Thornton Baltic UAB Kauno filialas
Lithuania	Grant Thornton Baltic UAB Klaipédos filialas
Luxembourg	Compliance & Control S.A.
Luxembourg	Grant Thornton Audit & Assurance
Luxembourg	Team Audit S.A.
Malta	Grant Thornton Malta
Holland	Grant Thornton Accountants en Adviseurs BV
Norway	Grant Thornton Revisjon AS
Poland	Grant Thornton Frąckowiak PSA
Poland	Grant Thornton Polska PSA
Portugal	Grant Thornton & Associados, SROC, Lda.
Romania	Grant Thornton Audit SRL
Slovakia	Grant Thornton Audit, s.r.o.
Slovakia	Grant Thornton Audit d.o.o.
Spain	GRANT THORNTON, S.L.P.
Sweden	Grant Thornton Sweden AB

# Statement

We hereby state that, during the year ended 30/06/2025, the Company fully applied the policies and procedures defined by the effective legislation, Article 13 of EU Regulation 537/2014 regarding monitoring the following issues:

- ensuring the independence of its members in the course of statutory audits and conduct of an internal review in order to facilitate the independence of Certified Public Accountants confirming that the relative review has been conducted in respect of all the engagements undertaken within the closing year
- effectiveness of the internal Quality Management System
- continuing Professional Development of Certified Public Accountants under Article 12 of Law 4449/2017, which incorporates the provisions of the Directive 2006/43/EC, as effective following its amendment through the Directive 2014/56/EU

The findings arising from the aforementioned reviews have been disclosed to the CEO and the competent bodies of GTIL, whose member-firm Grant Thornton Greece is, in accordance with the principles and regulations governing the operation of the firm.

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**Dimitra Pagoni, Partner,  
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