

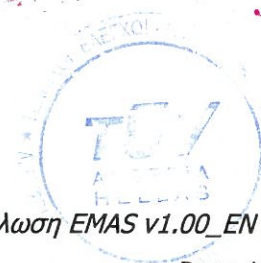
ENVIRONMENTAL STATEMENT FOR 2024

**Community Eco-Management and Audit Scheme in accordance with Regulation (EC)
No 1221/2009 as amended by Regulations (EU) 2017/1505 and (EU) 2018/2026**

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Introduction

NETCOMPANY S.A. and the environment

Aware of the fragile ecological equilibrium of the current age, the Company is committed to promoting joint actions to raise ecological awareness and to putting into effect the environmental vision that inspires the Company's top level hierarchy.

The Company has adopted and implements environmental conduct rules to protect and conserve the environment with particular consistency and care.

It monitors the ever-increasing trend of awareness and sensitivity among society as a whole – and the business world in particular– about the fact that the environment is an integral part of our activities.

This environmental statement expresses the Company's intention to constantly improve its own environmental performance, and has been prepared in the context of its commitment to provide full disclosure about this to its employees and all stakeholders.

The information presented in this environmental statement relates to the period 1.1.2024 to 31.12.2024.

About NETCOMPANY S.A.

NETCOMPANY S.A. is a European IT Solutions and Services company with a strong international presence and know-how, offering innovative, value-added high quality solutions to a wide range of international and national public and private organisations. The company's head offices are located in Luxembourg (2b rue Nicolas Bové, L-1253 Luxembourg). The EMAS entry covers a total of 5 company facilities:

1) The head offices in Luxembourg at 2b rue Nicolas Bové, L-1253 Luxembourg

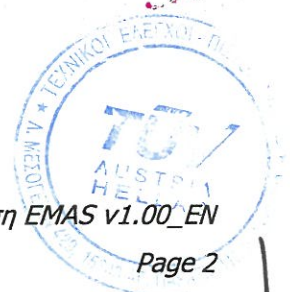
2) Three branches in Athens:

- 13 Frangoklissias St., Marousi GR-15125
- 115 Kifissias Ave., Athens GR-11524 (The Orbit building)
- 40 Vas. Amalias Ave., Athens GR-10558

3) One branch in Brussels:

- Tour Bastion, Place du Champ de Mars 5/10

Sectors of activity



NETCOMPANY S.A. primarily serves clients in the following markets offering a comprehensive, extensive range of solutions and professional services:

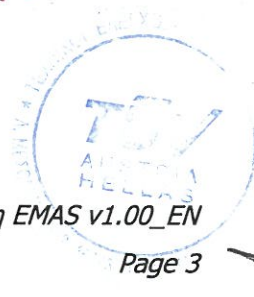
- European Institutions and agencies
- Public Sector
- Banking & Financial Sector
- Transport & Logistics
- Telecommunications

Services

Dedication to customer service, flawless technical training and a high degree of professionalism are the building blocks on which NETCOMPANY S.A. bases its success. The company helps its customer organisations meet their business needs by benefiting from the advantages of proper management of information and knowledge and by exploiting the opportunities presented by technological developments.

NETCOMPANY S.A. offers a full range of system integration services and consultancy services which allow organisations to rapidly meet their escalating needs for proper management of information and knowledge and use of technology. The key to the success of the company's services is a deep understanding of the business needs of national and international organisations in the public and private sector, combined with the provision of integrated services/solutions and a proven track record of successful and timely delivery of projects.

- IT Resourcing & Managed Services
- Information & Communication Services
- Business & Technical Consulting Services
- NOMOS Legal Databank



Environmental Policy

NETCOMPANY S.A. is a leading European company in the field of ICT services. NETCOMPANY S.A.'s management team undertakes to support and implement the following policy:

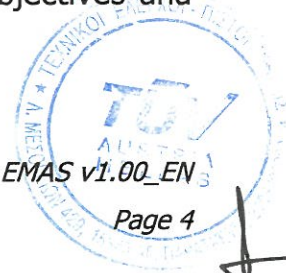
- We are obliged to comply with existing environmental legislation and other environmental requirements in the context of NETCOMPANY S.A.'s business activities.
- As part of its operations, the Company is making continuous efforts to evaluate and minimise negative impacts on the environment which could be caused by its activities.
- We implement environmental programmes and actions within and outside the company to raise awareness among employees and partners about the projects we have undertaken to implement.
- We set, implement and revise improvement targets based on the results of previous reports and in light of new circumstances.
- We implement environmental standards and encourage the use of modern technologies where that is economically viable, to reduce the use of natural resources, pollution and the quantity of end waste which ends up in the environment.
- We urge and encourage our suppliers to take suitable measures and implement policies to protect and improve the environment.
- We provide training to company employees about environmental awareness and care issues.
- We provide all reasonable and feasible means required to implement this policy.
- We are constantly improving the company's environmental management system in a dynamic manner.

Alexandros Stergios-Manos

CEO

Environmental Management System

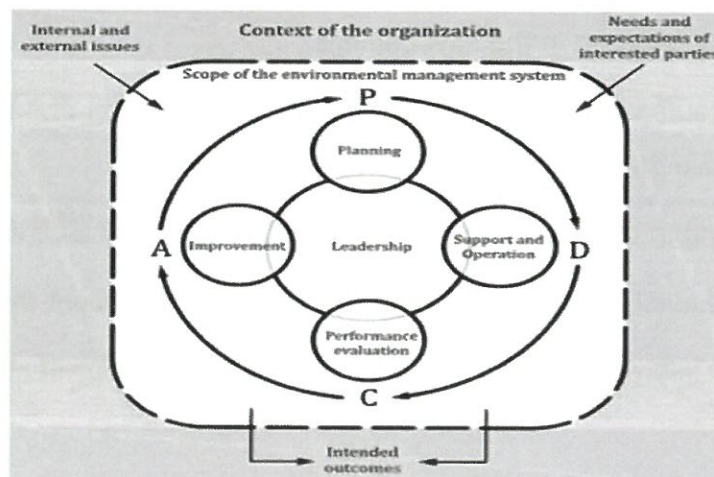
NETCOMPANY S.A. maintains and implements an Environmental Management System in line with the requirements of the ISO 14001:2015 standard and EU EMAS III Regulation and sets out how they are to be satisfied. It ensures that the results of its activities comply with the environmental policy it has adopted and the relevant objectives and targets it has set.



The Company's Environmental Management System consists of the following key elements:

- Environmental policy
- Management System objectives and targets
- Environmental Manual
- Description of system process interactions
- Job descriptions for process holders
- KPIs to measure the effectiveness of processes
- Linking processes to further documents

Our approach to the Environmental Management System is based on the improvement cycle known as "Do - Plan - Check - Act" (or PDCA) and is presented in diagram form in Figure 1.



NETCOMPANY S.A. carried out an environmental review to identify and evaluate the environmental aspects of its activities and to identify the applicable legal and other environmental requirements. It has identified external and internal issues which affect Company operations and the needs and expectations of stakeholders and has specified the scope of the environmental management system.

External factors



Factor	Response measures
Statutory framework	Ongoing monitoring and implementation of environmental legislation
Political framework	Implementation of company policy Involvement of legal, financial and technical divisions.
Technological Developments	Monitoring technological developments and allocating resources to adopt them where that is feasible
Environmental conditions	Protecting air quality, water quality, land use, preventing pollution, limiting the consumption of natural resources, protecting biodiversity, preventing climate change

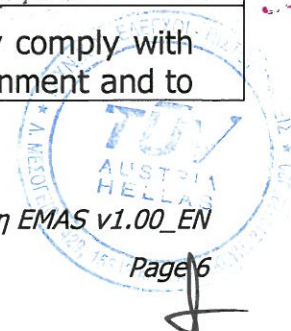
Internal factors

Factor	Response measures
NETCOMPANY S.A.'s activities	The company's activities do not give rise to specific environmental issues.
Corporate culture	NETCOMPANY S.A.'s culture is clearly captured in its environmental policy.
Personnel	Awareness raising, adequacy through training
Infrastructure	Allocation of adequate resources to implement and improve the Environmental Management System and prevent climate change

The Company's stakeholders and their expectations are as follows:

Stakeholders

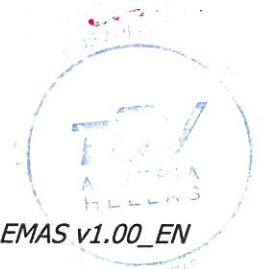
Stakeholder	Expectation
Investors	They expect the Company to properly manage risks and opportunities arising from environmental impacts and how they could affect their investment.
Management	It expects staff to properly comply with internal rules on the environment and to



	properly implement the Environmental Management System and prevent climate change
Personnel	Personnel expect Management to provide adequate resources to implement environmental programmes
Local Authorities	Legal compliance with environmental legislation
Local Community	Pollution prevention
Customers	Pollution prevention, compliance with legislation and sticking to commitments
Suppliers	Clear guidelines on compliance with their environmental obligations to NETCOMPANY S.A.
Waste collection, transport and management companies	Compliance with agreements entered into with NETCOMPANY S.A.
Certification body	Proper implementation of the Environmental Management System

The scope of the environmental management system which has been defined is as follows:

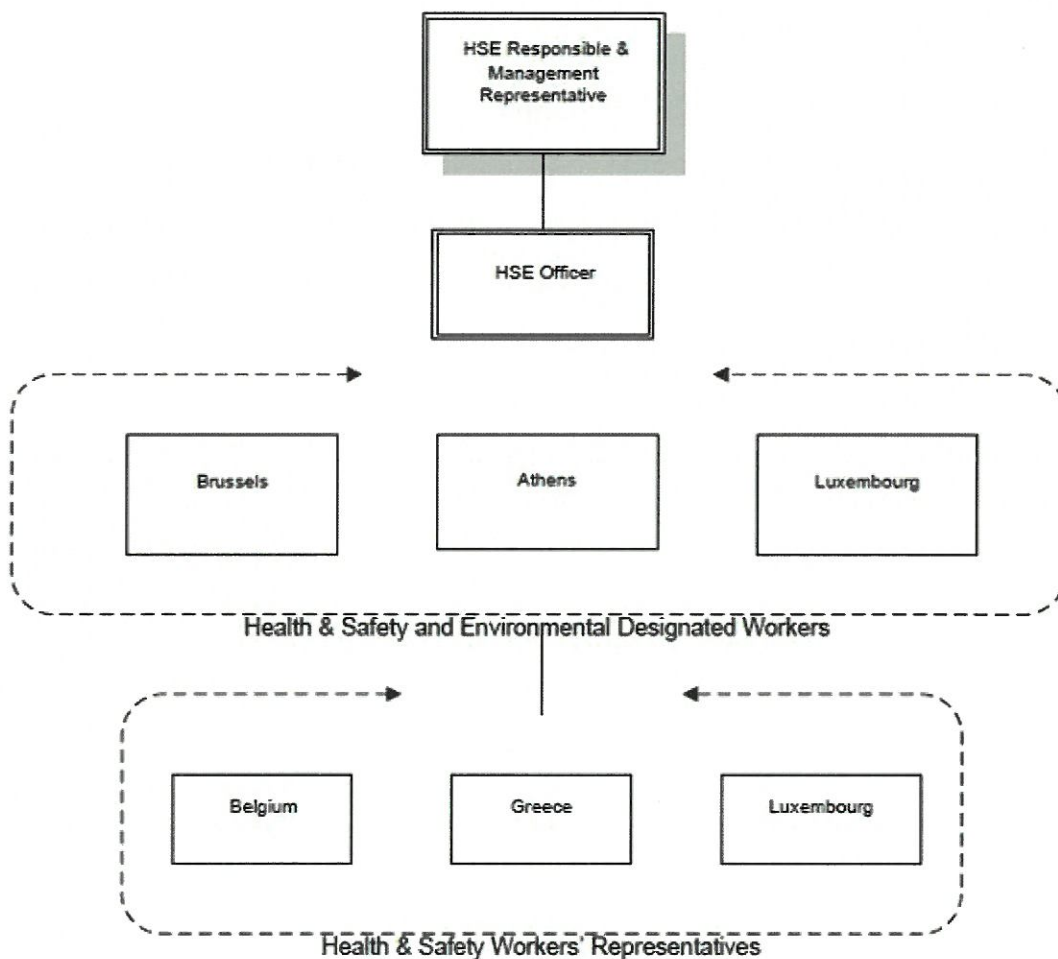
- Business research, analysis, design, development, integration, testing, installation, extension, purchase, supply and maintenance of IT systems and products.
- Network design, installation, configuration and maintenance.
- IT system functions.
- Project and Product Management.
- IT system/service hosting.
- Outsourcing.
- Communication, Content Management and Audiovisual Media Management Services.
- Consultancy services to businesses and support services in the Information and Communication Technology sector.
- Call Centre and Customer Service Services.
- Multimedia materials and services.



- Security management services.

To implement and monitor the performance of the Environmental Management System, NETCOMPANY S.A. has allocated responsibilities and competences, has designated suitable roles within the Company and has put in place procedures for internal and external communication. The organisational structure of NETCOMPANY S.A.'s Environmental Management System is set out below.

NETCOMPANY INTRASOFT | Health & Safety and Environmental team



Environmental aspects and impacts, threats and opportunities

The process of identifying and evaluating significant environmental aspects associated with the company's activities examines:

- Waste management.
- Controlled and uncontrolled atmospheric emissions.
- Soil pollution.
- Fluid leakages/spills.
- Use of natural resources.
- Noise issues.
- Other environmental issues.

NETCOMPANY S.A. has laid down criteria for evaluating environmental aspects and impacts taking into account normal conditions and abnormal conditions (foreseeable emergencies). The criteria for evaluating environmental aspects and impacts are presented in the tables below where Risk Degree = Severity × Frequency. The evaluation takes into account NETCOMPANY S.A.'s policy, existing legislation, stakeholder concerns and comments from internal audits concerning the environment.

Severity Indicator	Description
1	Minor size and duration
2	Medium size and duration
3	Major size and duration

Frequency Indicator	Description
1	Quite unlikely incident
2	Unlikely but known incident
3	Relatively frequent incident
4	Frequent and regular incident

Risk Degree	Description
10-12	Immediate action, Environmental Program initiation
7-9	Action in the next 6 months
0-6	No immediate action, periodic review



The environmental aspects, impacts, threats and opportunities which have been identified and categorised based on their risk degree are as follows:

S/ N	Procedure	Environmental Aspect	Environmental Impact	Severity	Frequency	Risk	JUSTIFICATION				Risk (1)/Opportunity (2)	Handling / Environmental Programmes
							Policy	Legislation	Observation	3rd Parties		
1	Printouts	Paper consumption	Natural resources consumption	3	3	9	✓				Increase in operating costs(1) Ways to reduce paper consumption(2)	Use of recyclable paper, double-sided printing and recycling of paper, use of digital applications
2	Printouts	Toner - ink consumption	Soil contamination, Landfill site contamination	2	3	6	✓				Reduction in toners consumption	Upgrade to cutting-edge printers, recycling of toners
3	Printouts	Electricity consumption	Consumption of non-renewable energy resources	2	2	4	✓				Reduction in electricity consumption	Printers are on stand-by when not in use; staff are made aware about reasonable printing policy.
4	Electronic equipment	Production of "electronic parts" waste	Soil, air and water contamination. Landfill Site	2	3	6	✓	✓			Soil pollution (1), recycling (2)	Recycling of electronic parts via licensed recycling companies / recording clear instructions in cooperation with IT about optimal management of electronic waste.
5	Electronic equipment	Production of "electronic parts" waste	Soil, air and water contamination. Landfill Site	2	3	6	✓				Soil pollution (1), circular economy donations (2)	Utilising devices that no longer meet the company's needs by donating them to other organisations that need them (NGOs, educational institutions, etc.)
6	Car Usage	Fuel consumption	Consumption of non-renewable energy resources	3	1	3	✓				Fuel leaks, eco-driving	A fleet of low fuel consumption anti-pollution vehicles; Eco-driving training
7	Car Usage	Car tyres	Soil, air and water contamination. Landfill Site	2	3	6	✓	✓			Environmental pollution	Recycling of tyres via company car fleet rental companies / recycling certificates



S/N	Procedure	Environmental Aspect	Environmental Impact	Severity	Frequency	Risk	JUSTIFICATION				Risk (1)/Opportunity (2)	Treatment / Utilisation
							Policy	Legislation	Observation	3rd Parties		
8	Car Usage	Flue-gas emissions	Air pollution, climate change	3	3	9	✓	✓	✓	✓	Environmental pollution	A fleet of low fuel consumption anti-pollution vehicles; Eco-driving training
9	Car Usage	Spent vehicle oils	Air and soil pollution	2	3	6	✓	✓	✓	✓	Environmental pollution	Recycling of tyres via company car fleet rental companies. Proper fleet maintenance
10	Air Conditioners / HVAC	Cooling fluid	Air pollution, contribution to greenhouse effect and ozone layer depletion	2	2	4	✓	✓	✓	✓	Non-compliance with legislation, fines	Use of environmentally friendly liquids/fluids, avoidance of leaks, regular maintenance of air-conditioners and proper disposal or recycling of waste.
11	Air Conditioners	Electricity consumption	Consumption of non-renewable energy resources, climate change	2	2	4	✓	✓	✓	✓	Greenhouse gas emissions that worsen climate change	Replacement of old air-conditioners with new ones of optimum energy class.
12	Office operations	Household waste plastic, paper	Soil, air and water contamination. Landfill Site contamination	3	3	9	✓	✓	✓	✓	(1) Environmental pollution / (2) Increased recycling of household waste	Installation of specially marked bins - provision of recycling instructions per category of waste at all company premises
13	Office operations	Waste generation - household batteries, spent light bulbs	Soil, air and water contamination. Landfill Site contamination	3	3	9	✓	✓	✓	✓	(1) Environmental pollution and non-compliance with the legislation due to uncontrolled waste disposal / (2) Improvement in environmental performance	Staff awareness campaigns, development of a procedure in line with the ISO 14001 standard to properly manage such waste and collaboration with certified bodies to recycle toxic and hazardous waste.



S/N	Procedure	Environmental Aspect	Environmental Impact	Severity	Frequency	Risk	JUSTIFICATION				Risk (1)/Opportunity (2)	Treatment / Utilisation
							Policy	Legislation	Observation	3rd Parties		
14	Office operations	Electricity consumption	Consumption of non-renewable energy resources, climate change	2	3	6	✓				Emissions of greenhouse gases and other pollutants, worsening climate change and increasing the company's environmental footprint.	Improved energy-efficient building infrastructure using renewable energy sources (LEED Certified). Contract with energy providers for 100% RES electricity supply
15	Water consumption for staff needs	Water	Wasted natural resources / Reduced water reserves	3	2	6	✓				(1) Increased water consumption / (2) Water savings by upgrading building infrastructure	Installation of double flow cisterns as well as flow limiters on taps, use of rainwater and drainage to a tank so water can be used in automatic watering system so as to recycle and save water.
16	Emergencies	Fire at offices	Air and soil contamination	3	2	6	✓		✓		Obstruction of work, injuries, damage to building infrastructure	Staff training, fire protection measures (fire/smoke detectors, fire extinguishers) and inspection and maintenance of fire detection and fire protection equipment
17	Emergencies	Leaks - flooding of office space	Wasted natural resources / Reduced water reserves	3	2	6			✓		Obstruction of work, injuries, damage to building infrastructure	Implementing a procedure to immediately address leaks. Training for staff to immediately identify and deal with leaks. Regular maintenance of plumbing systems and immediate repair of leaks to minimise risk.



Environmental performance

The quantities of recyclable materials arising from NETCOMPANY S.A.'s operations in the context of company environmental management are recorded.

In Athens, waste is managed exclusively by our company, while at our buildings in Brussels and Luxembourg recycling is managed centrally per building, with the result that there is no accurate data per category which relates exclusively to our company. Having said that, recycling is carried out as normal in accordance with the applicable legal requirements.

Recycling is carried out via suitably licensed and certified bodies per waste category in accordance with the relevant environmental legislation and the requirements of the ISO 14001 standard.

Recyclable materials include paper, electrical and electronic equipment, devices and batteries. The Athens data is presented in detail below.

Battery recycling



<https://afis.gr/>

Year	Kilos
2024	46

Waste recycling



<https://helector.com/>

Year	Kilos
2024	3160

IT equipment recycling



<https://www.electrocycle.gr/>

Year	Kilos
2024	1653

Athens



Natural resources

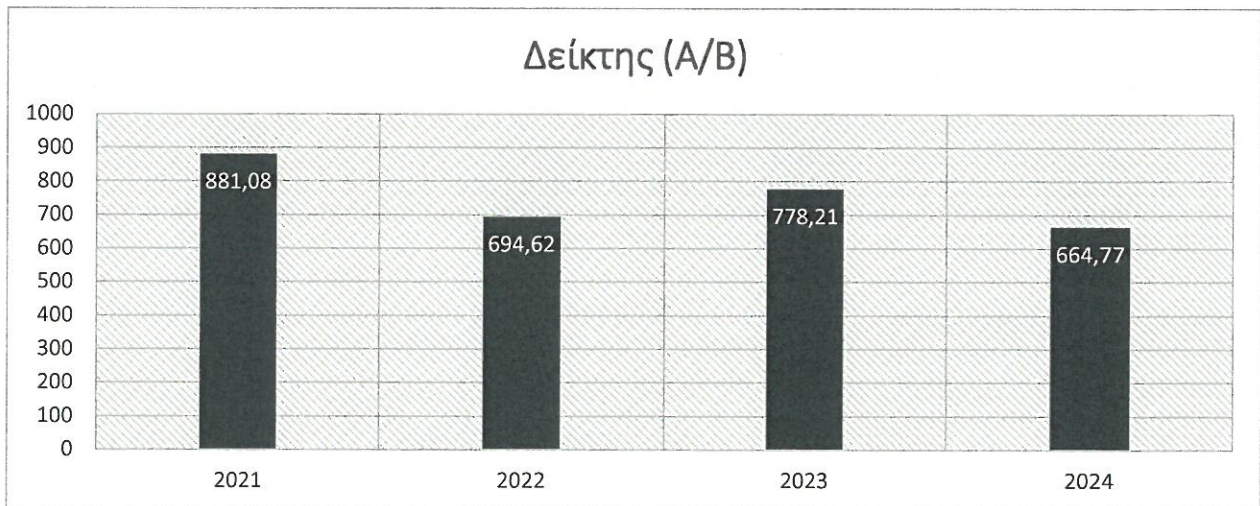
Electricity consumption Athens

Year	(A) KWH	(B) Employees	Ratio of A to B
2021	1212362	1376	881.08
2022	1043323	1502	694.62
2023	1350977	1736	778.21
2024	1314247	1977	664.77

In 2024 there was an increase in staff levels but at the same time there was also a drop in consumption. This development is primarily attributed to the company moving to certified green (LEED) buildings which have:

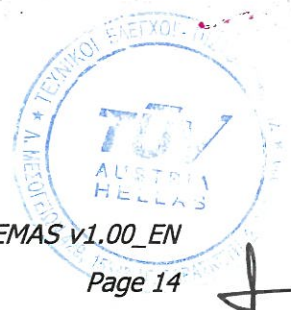
- Improved energy efficiency
- Smart energy and lighting management systems
- Improved sustainability infrastructure.

Moving to buildings with environmental certification is another step towards sustainability and responsible environmental management for NETCOMPANY S.A.

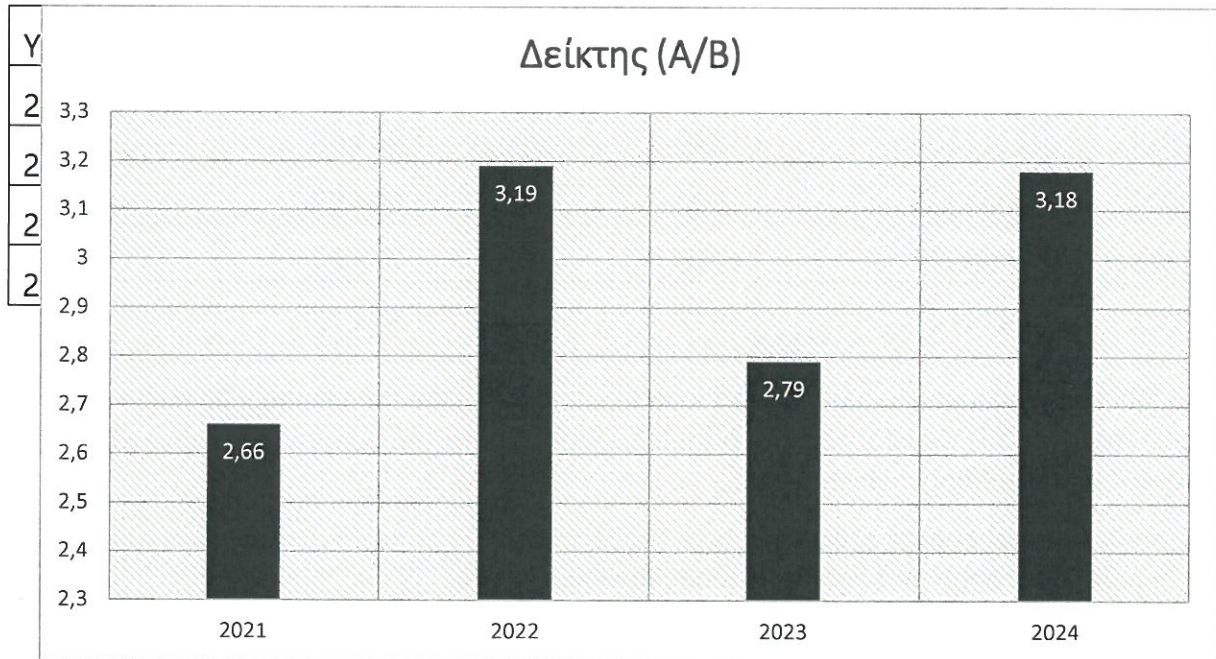


100% of the energy consumed comes from renewable energy sources.

Water consumption Athens



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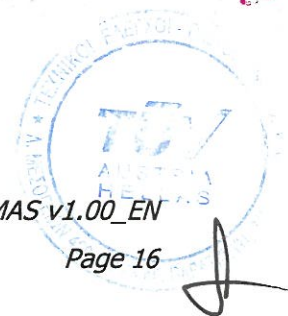
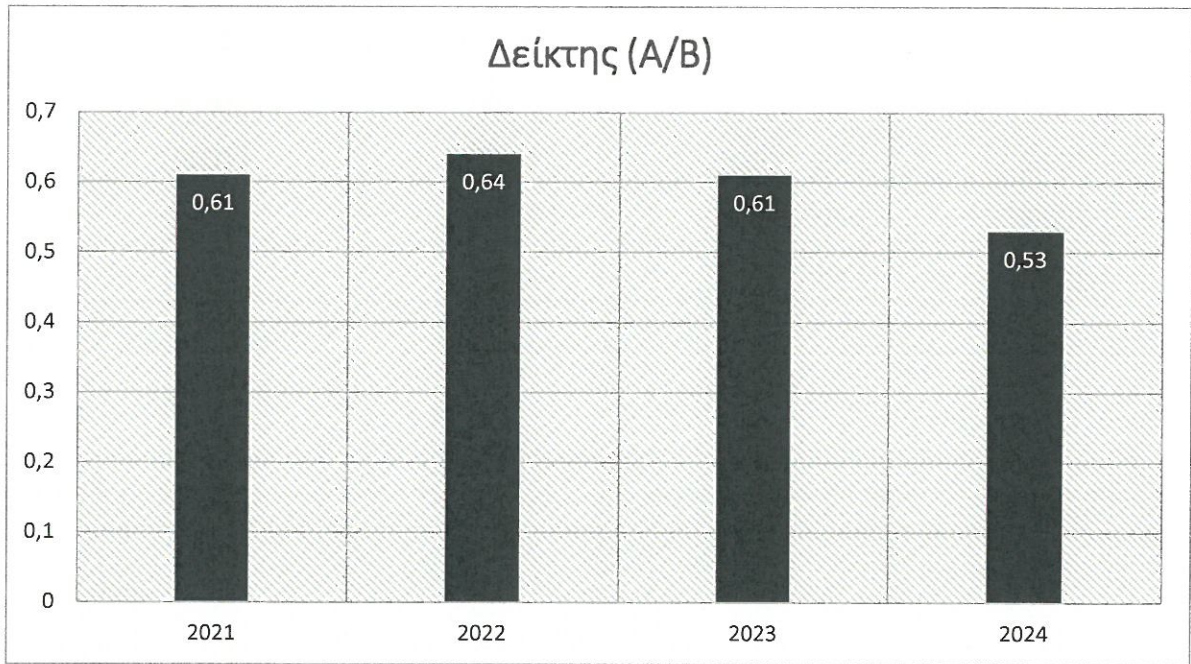


There is a small increase in water consumption, which is due to the move to new buildings with more kitchens and toilets, and to a significantly increased level of green space. However, in relation to the increase in square metres, communal areas and green areas, the increase in consumption is considered to be completely reasonable and expected.

Paper consumption Athens

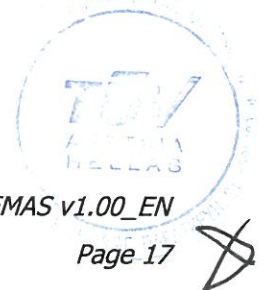
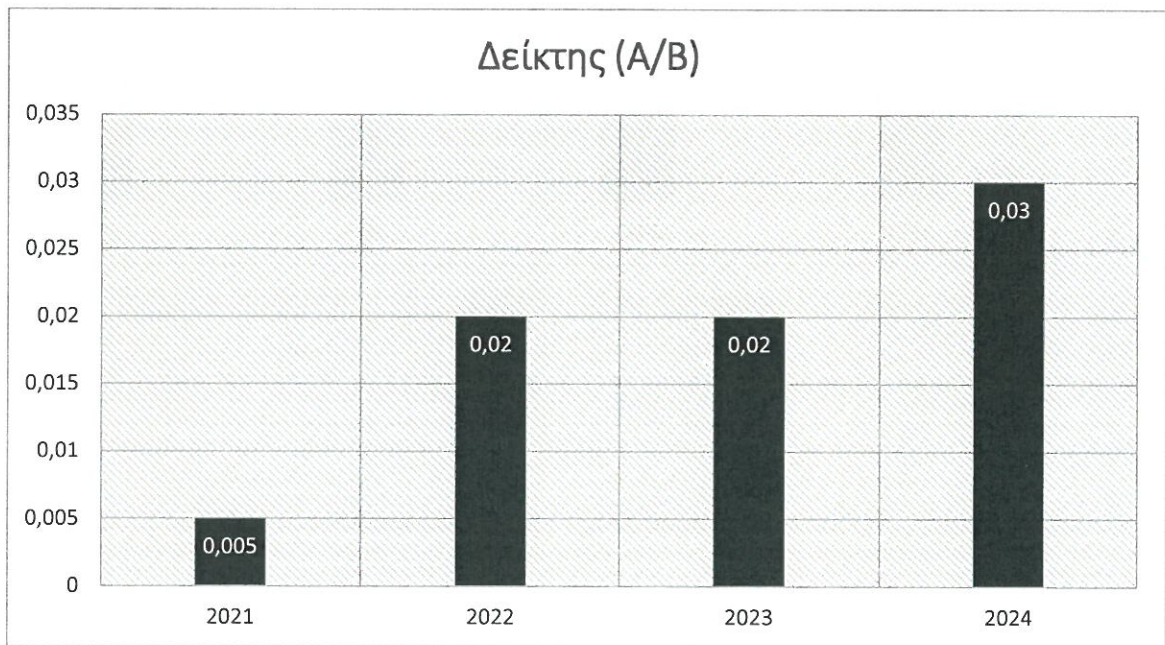
Year	(A) Pack of printing paper (500 pages)	(B) Employees	Ratio of A to B
2021	851	1376	0.61
2022	962	1502	0.64
2023	1073	1736	0.61
2024	1046	1977	0.53





Toners Consumption Athens

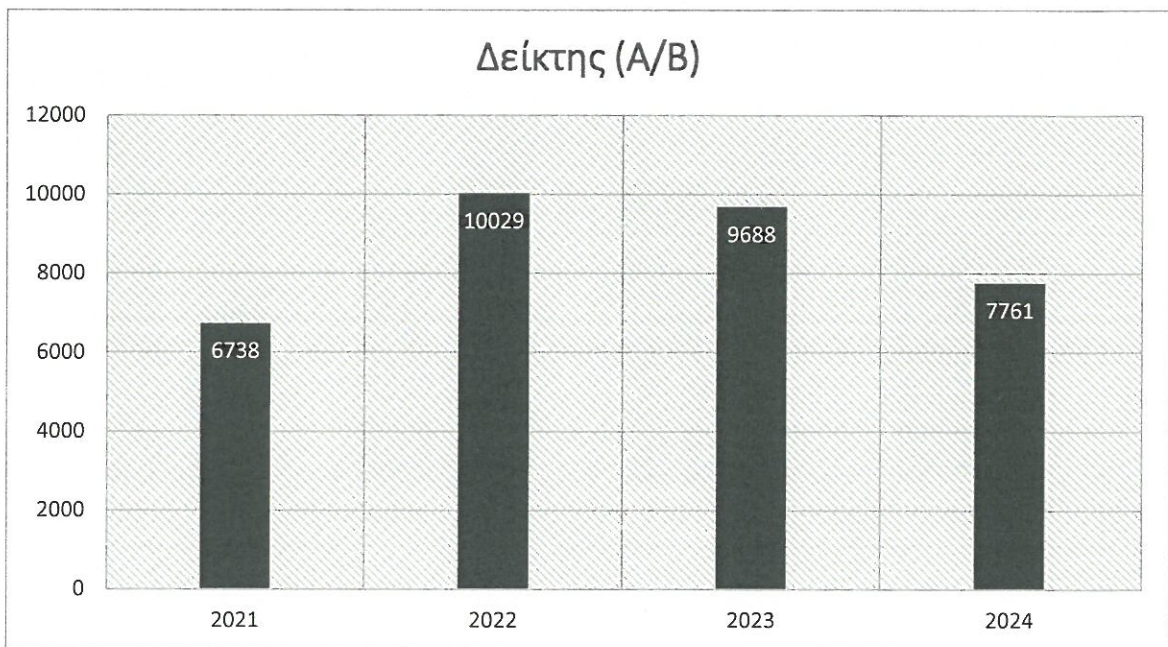
Year	(A) Toners	(B) Employees	Ratio of A to B
2021	8	1376	0.005
2022	33	1502	0.02
2023	40	1736	0.02
2024	51	1977	0.03



Luxembourg

Electricity consumption Luxembourg

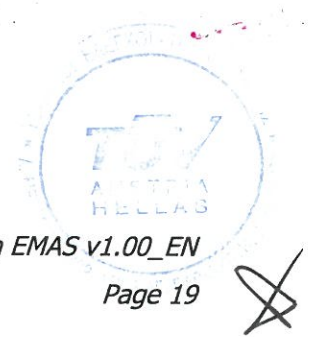
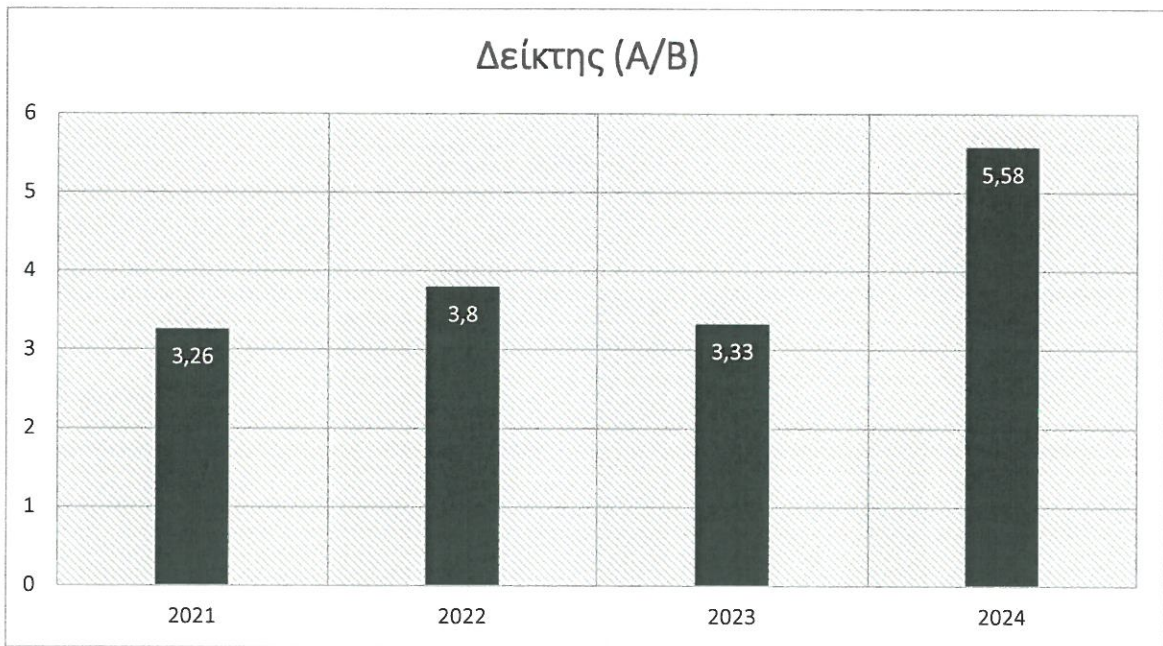
Year	(A) KWH	(B) Employees	Ratio of A to B
2021	283000	42	6738
2022	421231	42	10029
2023	406918	42	9688
2024	333727	43	7761



The HVAC systems were replaced in August 2023 and replacement of the batteries followed in November. There was a significant improvement in performance after these changes.

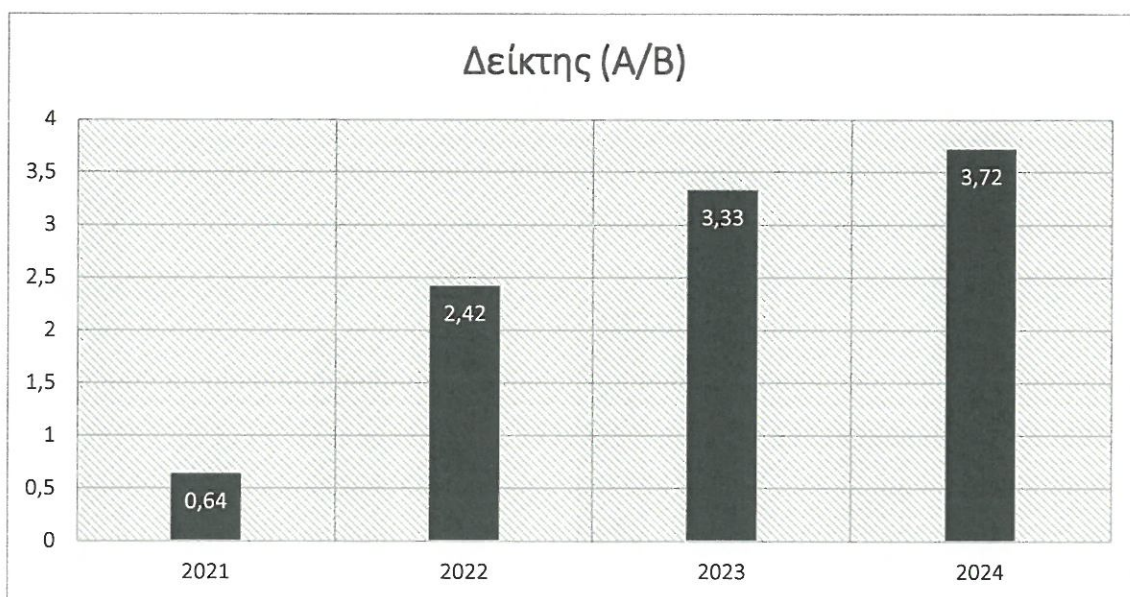
Water consumption Luxembourg

Year	(A) m3 of water	(B) Employees	Ratio of A to B
2021	137	42	3.26
2022	160	42	3.80
2023	140	42	3.33
2024	240	43	5.58



Paper consumption Luxembourg

Year	(A) Packs of printing paper	(B) Employees	Ratio of A to B
2021	27	42	0.64
2022	102	42	2.42
2023	210	42	3.33
2024	160	43	3.72

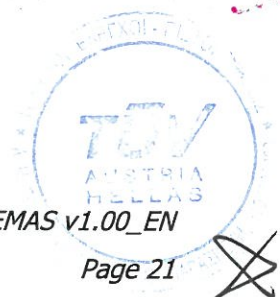
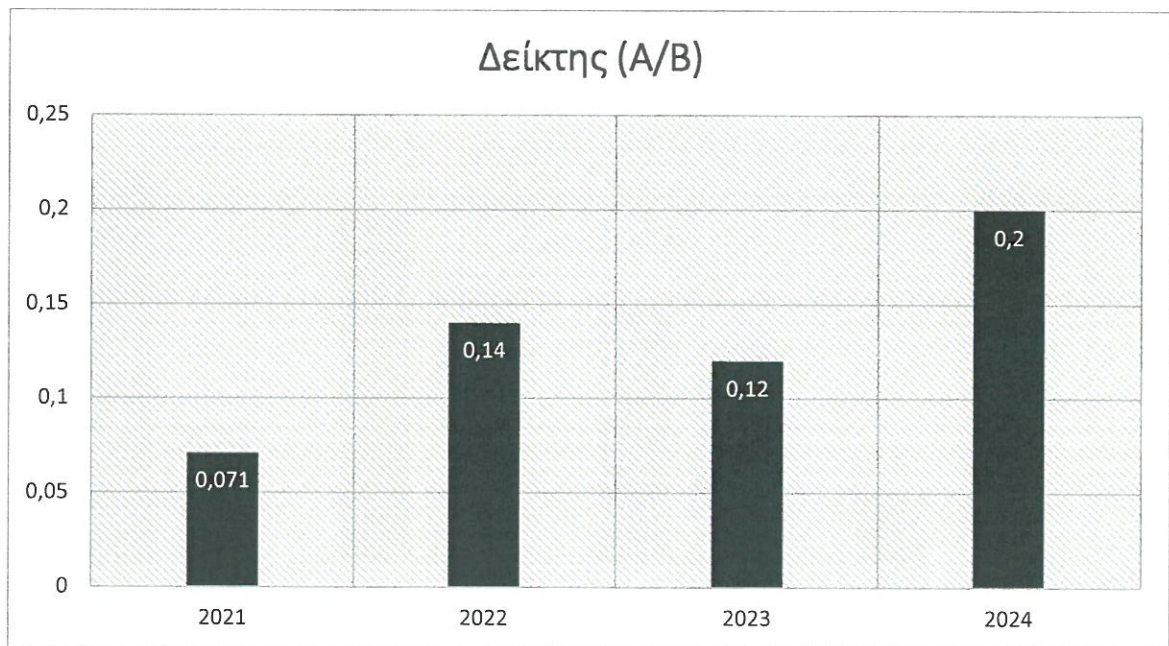


The majority of paper consumed is made of recycled paper.



Toner Consumption Luxembourg

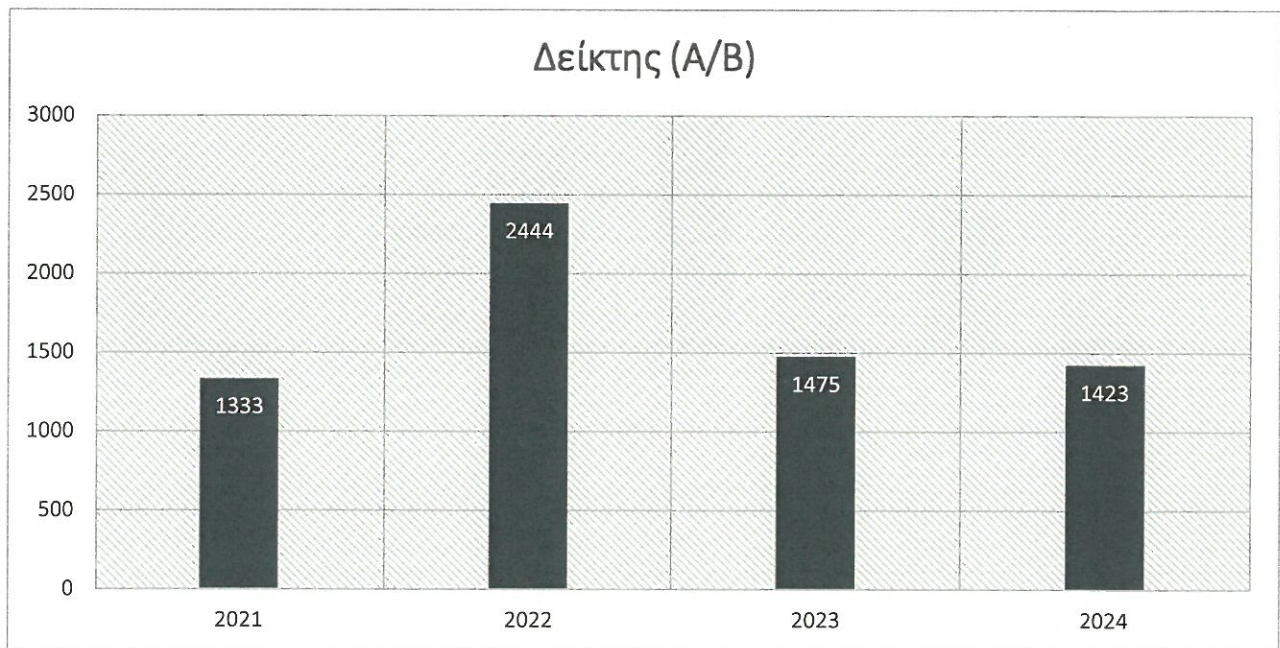
Year	(A) Toner	(B) Employees	Ratio of A to B
2021	3	42	0.071
2022	6	42	0.14
2023	5	42	0.12
2024	9	43	0.20



Brussels

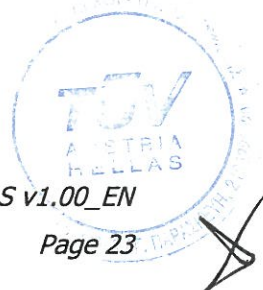
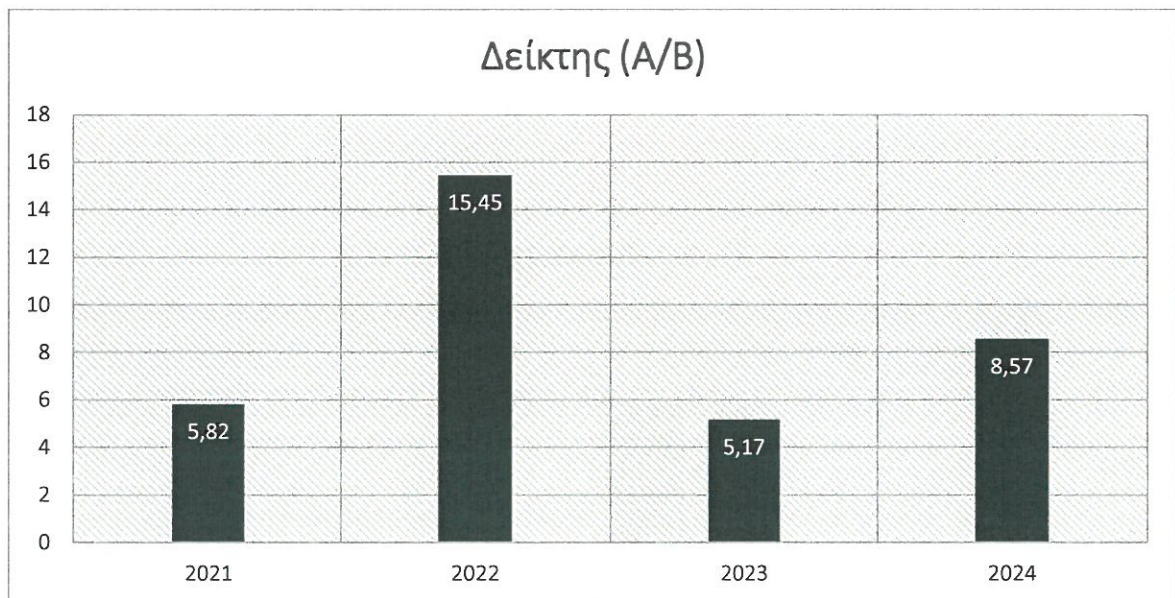
Electricity consumption Brussels

Year	(A) KWH	(B) Employees	Ratio of A to B
2021	52000	39	1333
2022	107577	44	2444
2023	69358	47	1475
2024	69737	49	1423



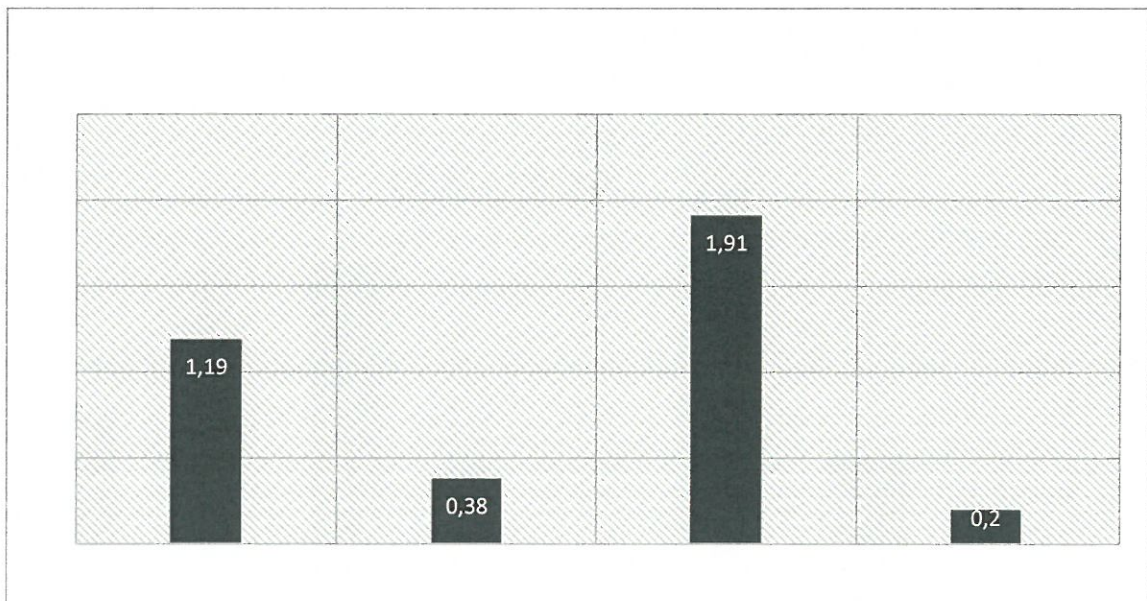
Water consumption Brussels

Year	(A) m3 of water	(B) Employees	Ratio of A to B
2021	227	39	5.82
2022	680	44	15.45
2023	243	47	5.17
2024	420	49	8.57



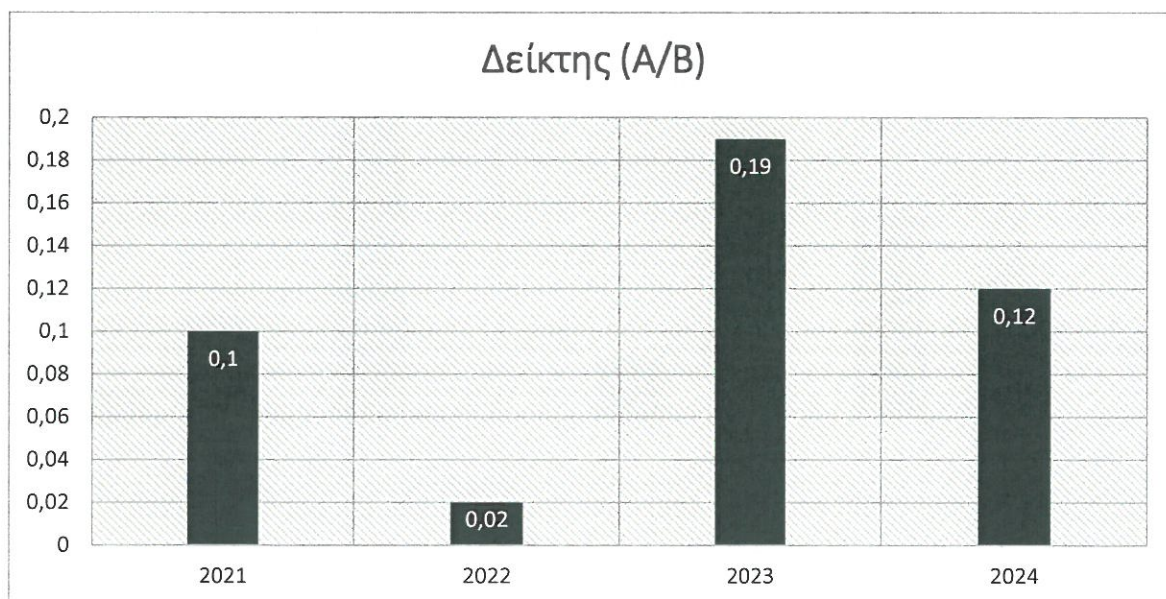
Paper consumption Brussels

Year	(A) Packs of printing paper	(B) Employees	Ratio of A to B
2021	46.5	39	1.19
2022	17	44	0.38
2023	90	47	1.91
2024	10	49	0.20



Toner consumption Brussels

Year	(A) Toners	(B) Employees	Ratio of A to B
2021	4	39	0.10
2022	1	44	0.02
2023	9	47	0.19
2024	6	49	0.12



Facilities - Biodiversity

NETCOMPANY S.A.'s facilities are in accordance with European provisions on respect for the environment. The facilities in Athens cover 13,000 m² in three areas of Athens, namely:

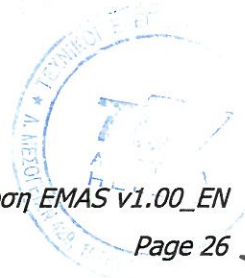
- Marousi, at 13 Frangoklissias St., GR-15125
- The Orbit, at 115 Kifissias Ave., GR-11524
- Amalias, at 40 Vasilissis Amalias Ave., GR-10558

In Brussels the offices at Tour Bastion, Place du Champ de Mars cover 1300 m² and in Luxembourg the offices at rue Nicolas Bové cover 950 m². The facilities on all five sites are rented by NETCOMPANY S.A. and include key office equipment (desks, chairs, printers, computer terminals, laptops, servers).

The results of measurements at various indicative locations are presented below

Electromagnetic measurements

Location	Measuring location	Measured value
Athens PERMISSIBLE LIMITS 100000 nt	13 Frangoklissias St., Marousi, Office space on each floor, stairwell, outdoor area	- nT
	13 Frangoklissias St., Electrical panels	40 nT
	The Orbit, Kifissias Ave., Office space, corridors	- nT
	The Orbit - Electrical panels	40 nT
	40 Vasilissis Amalias Ave., Office space, corridors, stairwell	- nT
	40 Vasilissis Amalias Ave., Server Room	542 nT
	40 Vasilissis Amalias Ave., Electrical panels	63 nT
	Tour Bastion Place du Champ de Mars 5/10, 1050	57 nT
	Immeuble Arts & Lux Avenue des Arts 58, 1000	0.82 nT
	2b, rue Nicolas Bové L-1253 Luxembourg	



Greenhouse emissions and the air

The activities of NETCOMPANY S.A.'s facilities in Athens, Luxembourg and Brussels result in greenhouse gas emissions which primarily come from the fuel (low sulphur diesel and petrol) consumed by company passenger vehicles which are used by executives and sales reps to move around.

The company's fleet of vehicles has been upgraded to EURO 6-spec vehicles which have reduced fuel consumption and lower pollutant emissions compared to older vehicles. At the same time, as an ongoing environmental improvement action, in 2024 the company further upgraded its fleet by procuring plug-in hybrid vehicles. The same policy will continue in 2025 since new orders for company vehicles will relate exclusively to plug-in hybrid models, with the aim of gradually increasing the percentage of low emission vehicles.

In addition, in 2024 the company invested in upgrading its infrastructure by installing additional electric vehicle charging stations at its facilities to make it easier for staff to use new vehicles.

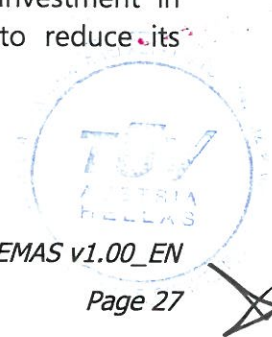
All new orders for company vehicles relate to vehicles with emission levels of up to 50 g Co₂/km only, thereby contributing to a reduction in the company's environmental footprint, to curbing consumption of non-renewable mineral resources, and to limiting emissions which affect the atmosphere.

The individual annual fuel consumption figures are presented in the table below.

Location	Annual consumption (litres) 2022	Annual consumption (litres) 2023	Annual consumption (litres) 2024
Greece	222,910	372,344	453,532
Luxembourg	65,778	63,517.62	63774.22
Brussels	116,534	119,191.5	121360.66

At the same time, the company subsidised 85% of the cost of the annual transport card for all staff, to bolster the use of public transport and reduce indirect greenhouse gas emissions associated with day-to-day travel. This specific intervention is a substantive investment in pollution prevention actions and is part of the company's overall strategy to reduce its environmental footprint.

Calculating emissions



The difference in emission factors from country to country is due to the different composition of fuels, the use of different technologies, and the policies in place, as well as different emission calculation methods. Each country monitors and records its emissions in accordance with its own national inventory report (NIR) 2024, which may include local factors and coefficients.

Greece

Fuel type	Consumption (Liters)	Energy (TJ)	CO2 emissions (tn CO2)	CH4 emissions (tn CO2 eq)	N2O emissions (tn CO2 eq)	Total emissions (tn CO2 eq)
Oil	159,221	6.15	455.40	0.52	3.37	459.30
Petrol	294,311	10.24	709.80	5.27	4.23	719.30

Electricity	Consumption (kWh)	CO2 emissions (tn CO2)	CH4 emissions (tn CO2 eq)	N2O emissions (tnCO2 eq)	Total emissions (tn CO2 eq)
	1,314,247	0	0	0	0

National Inventory Report (NIR)- Greece: Electricity consumption is 100% covered by certified RES via guarantees of origin. Emissions are considered to be zero.

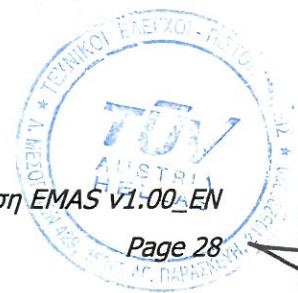
Brussels

Fuel type	Consumption (Liters)	Energy (TJ)	CO2 emissions (tn CO2)	CH4 emissions (tn CO2 eq)	N2O emissions (tn CO2 eq)	Total emissions (tn CO2 eq)
Oil	40814.72	1.58	117.1	0.13	0.88	118.10
Petrol	80545.94	2.80	194	1.44	1.19	196.60

Electricity	Consumption (kWh)	CO2 emissions (tn CO2)	CH4 emissions (tn CO2 eq)	N2O emissions (tn CO2 eq)	Total emissions (tn CO2 eq)
	69737	0	0	0	0

National Inventory Report (NIR) – Brussels

Luxembourg

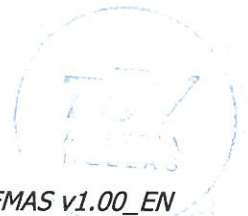


Fuel type	Consumption (Liters)	CO2 emissions (tn CO2)	CH4 emissions (tn CO2 eq)	N2O emissions (tn CO2 eq)	Total emissions (tn CO2 eq)
Oil	50411.78	144.2	0.16	1.08	145.40
Petrol	13362.44	32.2	0.24	0.20	32.6

Electricity	Consumption (kWh)	CO2 emissions (tn CO2)	CH4 emissions (tn CO2 eq)	N2O emissions (tn CO2 eq)	Total emissions (tn CO2 eq)
	406918	0	0	0	0

National Inventory Report (NIR) - Luxembourg

Electricity consumption is 100% covered by certified RES via guarantees of origin. Emissions are considered to be zero.



Environmental Objectives, Targets and Programmes

The environmental objectives, targets and programmes which had been set in the last Management Review for 2024 are presented below.

Objective	Target	Programme	Contact	Implementation status	Implementation period	Actions - Results
Reduced electricity consumption at all facilities	5% reduction in consumption	Relocation of company to LEED facilities	Facilities manager	Completed	01/01/2024-31/12/2024	The company moved to larger premises and increased staff numbers. However, there is a 15% reduction in consumption per employee and energy comes from 100% RES.
Reduced water consumption at all facilities	5% reduction in consumption	Relocation of company to LEED facilities	Facilities Manager	Completed	01/01/2024-31/12/2024	The company moved to larger premises and increased staff numbers. Despite that, due to the relocation to LEED-certified buildings with water recycling systems and new technologies, effective use of water has been ensured.
Recycling at all facilities	Measuring quantities of recyclable materials per category to set measurable targets	Segregation of waste - Collaboration with a certified recycling company to collect recyclable materials in Greece	HSE Team	Completed	01/01/2024-31/12/2024	The company increased the number of waste separation points in all communal areas and entered into a partnership with HELLAKTOR S.A. to obtain with per-kilo-of-material certificates to enable it to set measurable targets. In Brussels and Luxembourg recycling is managed centrally per building with the result that there is no accurate data per category which relates exclusively to our company. Having said that, recycling is carried out as normal in accordance with the applicable legal requirements.



CO2 emissions	Reduced greenhouse gas emissions by replacing cars in the fleet with hybrid vehicles	Improving our car policy	Admin - Facilities, Procurement Director, Car fleet manager, HR Department	Completed	01/01/2024-31/12/2024	The company's car policy has been improved by adding more plug-in hybrid vehicles and the number of electric vehicles in the fleet has increased, demonstrating our strong commitment to sustainable, environmentally-friendly mobility.
CO2 emissions	Reducing greenhouse gas emissions	Subsidising staff by providing an annual travel card for use on public transport	HR Department, Procurement	Completed	01/01/2024-31/12/2024	At the same time, the company subsidised 85% of the cost of the annual transport card for all staff, to bolster the use of public transport and reduce indirect greenhouse gas emissions associated with day-to-day travel.
Raising staff awareness about environmental issues	Staff training - environmental sensitivity - environmental actions	Campaign with instructions on proper recycling per category	HSE Team, Marcom	Completed	01/01/2024-31/12/2024	Due to rebranding, we are moving the campaign to 2025 to ensure alignment with the new logo.
Electronic equipment recycling	Quantifying electronic equipment recycling	Development of a procedure to make recycling and re-use of withdrawn electronic equipment measurable, ensuring that such equipment is recycled or donated to charitable organisations and educational institutions.	HSE Team, Procurement, Marcom	Completed	01/01/2024-31/12/2024	Collaboration with Electrocycle and DEVICE RECYCLING S.A.





Recycling programmes (electrical/electronic devices, packaging, blue bins, batteries, toners, UPS devices)

NETCOMPANY S.A. is actively contributing to the conservation of natural resources while keeping existing recycling schemes in place. Recycling relates to:

- Household waste
- Electrical and electronic devices
- Printer Toners
- Batteries

Electrical and electronic devices

Through the "Giving IT equipment a new lease of life" initiative, NETCOMPANY S.A. is giving the company's technological equipment, which is in excellent condition, a new lease of life by donating computers, screens, keyboards and even more types of equipment throughout the year to educational institutions such as kindergartens, primary and secondary schools, as well as to foundations and NGOs.

Fleet of cars

100% of the company's fleet of cars is comprised of cutting-edge diesel and petrol engines (Euro 6), thereby drastically reducing both gas emissions and fuel consumption, while conserving natural resources. In addition, cars in the fleet are gradually being replaced by hybrid vehicles and electric cars.

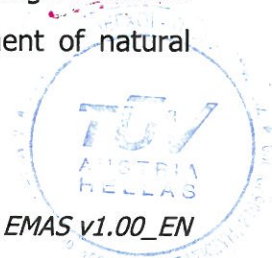
Electricity savings at all facilities

The Company has entered into an agreement with energy providers to consume electricity exclusively from renewable energy sources (RES). These initiatives bolster our objective of achieving sustainability and help us transition to a greener future.

Water savings at all facilities

Treating water resources with respect, NETCOMPANY S.A. has adopted practices and technologies that allow it to increase the quantity of water saved at all its facilities. Our kitchens have been equipped with water dispensers to limit unnecessary consumption and promote the responsible use of water.

Moreover, the majority of our buildings, which are LEED certified, have been designed to utilise collected rainwater for uses such as irrigation and other non-potable needs. Through initiatives like these our company is bolstering its commitment to sustainable management of natural resources.



Objectives and Targets for 2025

The objectives and targets set for 2025 are set out below:

Objective	Target	Implementation time limit
Compliance with laws	Continuous compliance with national and European health, safety and environment (HSE) legislation	01/01/2025 – 31/12/2025
Electronic equipment (e-waste) recycling	Recycling 400 kg of IT equipment	01/01/2025 – 31/12/2025
Promoting re-use via donations	Donation of 40 laptops in line with circular economy principles	01/01/2025 – 31/12/2025
Material recycling	Recycling 2,000 kg of mixed materials	01/01/2025 – 31/12/2025
Raising awareness about recycling issues	Implementation of a corporate recycling campaign across the entire organisation	01/01/2025 – 31/12/2025
Increased use of renewable energy sources	≥50% of electricity consumed from RES	01/01/2025 – 31/12/2025
Protecting and enhancing biodiversity	Implementation of biodiversity actions at ≥3 company facilities	01/01/2025 – 31/12/2025
Risk management related to climate change	Identifying, evaluating and monitoring natural climate change risks	01/01/2025 – 31/12/2025
Reducing greenhouse gas emissions	Subsidising staff by providing an annual travel card for use on public transport	01/01/2025 – 31/12/2025
Reducing greenhouse gas emissions	Fleet replacement with hybrid vehicles	01/01/2025 – 31/12/2025



Permits and Licences

Permits and certificates, legislation and compliance

NETCOMPANY S.A. operates in accordance with the law and complies with all authorisations/permits required by law (Fire Safety Study approved by the Fire Service, Contingency Plan, Company Internal Regulations approved by the Ministry of Labour).

Certificates

- CMMI v3.0 DEV (Capability Maturity Model Integration for Development, Level 3 Staged)
- ISO 9001:2015 (Quality Management Systems – Requirements);
- ISO 20000-1:2018 (IT Service Management Systems – Requirements);
- ISO 27001:2022 (Information Security Management Systems – Requirements);
- ISO 22301:2019 (Societal Security – Business Continuity Management System);
- ISO 29993:2017 (Learning Services outside Formal Education – Service Requirements);
- ISO 14001:2015 (Environmental Management Systems – Requirements);
- ISO 45001:2018 (Occupational Health and Safety Management);
- ISO 27017:2015 CONFIRMATION (Security Controls for Cloud Services)



Legislative compliance

In addition to the authorisations/permits and certificates held by NETCOMPANY S.A., the Company also specifies the legislative obligations it has to comply with. It does so by using sources such as external consultants, the NOMOS database, the sites of the Ministry of the Environment, Energy and Climate Change and the Hellenic Institute for Occupational Health and Safety (ELINYAE), legilux.public.lu and others.

Tables are presented below with the indicative environmental legislation which applies in each country.

Annex 1 (Attached)



A

1 Environmental Verifier's Declaration on Verification and Validation Activities

The organisation TÜV AUSTRIA HELLAS Single Member Limited Liability Company, EMAS environmental verifier Reg No. EL-V-0006- No. 207-12 accredited for the scope of activities shown in the Accreditation Certificate (NACE code), declares that it verified whether the sites referred to in the environmental statement of **NETCOMPANY S.A.**, registered under No. **LU-000006**, meet all the requirements of Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS), as amended by Regulations (EU) 2017/1505 and 2018/2026.

By signing this declaration, its declares that:

- the verification and validation have been carried out in accordance with the requirements of Regulation (EC) No 1221/2009 as amended by Regulations (EU) 2017/1505 and 2018/2026,
- the outcome of the verification and validation confirms that there is no evidence of non-compliance with applicable legal requirements relating to the environment
- the data and information contained in the environmental statement for the sites provide a valid, reliable and accurate picture of all activities carried out at the sites, within the scope referred to in the environmental statement.

This document is not equivalent to EMAS registration. EMAS registration can only be granted by a Competent Body under Regulation (EC) No 1221/2009. This document must not be used as a stand-alone piece of public communication.

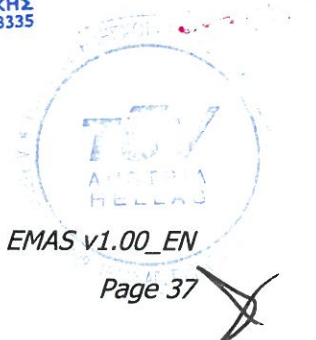
Athens,

Signatures

Manos Kanakis
Head of Group Procurement

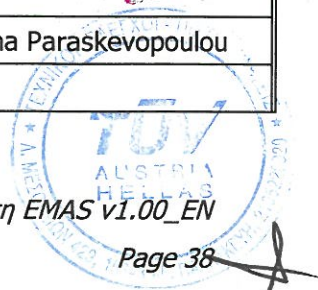
Netcompany

NETCOMPANY S.A.
ΕΛΛΗΝΙΚΟ ΥΠΟΚΑΤΑΣΤΗΜΑ
ΠΛΗΡΟΦΟΡΙΚΗ - ΣΥΣΤΗΜΑΤΑ ΛΟΓΙΣΜΙΚΟΥ
ΤΗΛΕΜΑΤΙΚΗ - ΤΗΛΕΠΙΚΟΙΝΩΝΙΕΣ
ΕΔΡΑ: ΦΡΑΓΚΟΚΚΛΗΣΙΑΣ 13 - Τ.Κ. 15125 ΜΑΡΟΥΣΙ
ΑΦΜ: 099360290 - ΔΟΥ: ΚΕΦΟΔΕ ΑΤΤΙΚΗΣ
ΓΕΜΗ: 123949801001 ΑΡ. ΜΗΤΡΟΥΧΟΥ ΠΑΡΑΓΩΓΟΥ: 3335

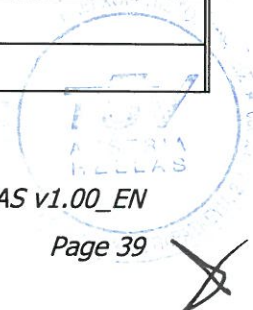


2 INFORMATION REQUIRED FOR REGISTRATION

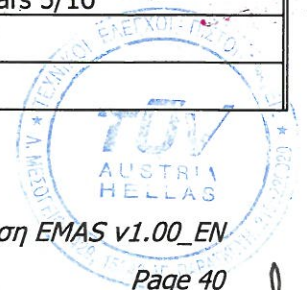
1. ORGANISATION	
Name	NETCOMPANY S.A.
Address	2b, rue Nicolas Bové
Town	Luxembourg
Postal code	L-1253
Country/land/region/Autonomous Community	Luxembourg
Contact person:	Ioannis Valtaras / Athina Paraskevopoulou
Tel.	00302106679777
Fax	
Email	ioannis.valtaras@netcompany.com/Athina.paraskevopoulou@netcompany.com
website	https://www.netcompany.com
Public access to the environmental statement or the updated environmental statement	YES
A) Printed form	NO
B) Electronic form	YES
Registration No.	LU-000006
Registration date	December 2025
Suspension date of registration	-
Deletion date of registration	-
Date of next environmental statement	December 2026
Date of next updated environmental statement	December 2026
Request for derogation pursuant to article 7 (YES - NO)	NO
NACE code of activities	62.01
No. of employees	43
Turnover or annual balance sheet	203,560,080.21 euros (2024 turnover)
2.1 SITE OF ACTIVITIES (GREECE - ATHENS)	
Name	NETCOMPANY S.A.
Address	Marousi, 13 Frangoklissias St.
Postal code	15125
Town	Athens
Country/land/region/Autonomous Community	Greece
Contact person:	Ioannis Valtaras / Athina Paraskevopoulou
Tel.	00302106679777



Fax	
Email	ioannis.valtaras@netcompany.com/Athina.paraskevopoulou@netcompany.com
website	https://www.netcompany.com
Public access to the environmental statement or the updated environmental statement	
A) Printed form	NO
B) Electronic form	YES
Registration No.	LU-000006
Registration date	December 2025
Suspension date of registration	-
Deletion date of registration	-
Date of next environmental statement	December 2026
Date of next updated environmental statement	December 2026
Request for derogation pursuant to article 7 (YES - NO)	NO
NACE code of activities	62.01
No. of employees	779
Turnover or annual balance sheet	194,239,091.65 euros (2024 turnover)
2.2 SITE OF ACTIVITIES (GREECE - ATHENS)	
Name	NETCOMPANY S.A.
Address	The Orbit, 155 Kifissias Ave.
Postal code	11524
Town	Athens
Country/land/region/Autonomous Community	Greece
Contact person:	Ioannis Valtaras / Athina Paraskevopoulou
Tel.	00302106679777
Fax	
Email	ioannis.valtaras@netcompany.com/Athina.paraskevopoulou@netcompany.com
website	https://www.netcompany.com
Public access to the environmental statement or the updated environmental statement	YES
A) Printed form	NO
B) Electronic form	YES
Registration No.	LU-000006
Registration date	December 2025
Suspension date of registration	-



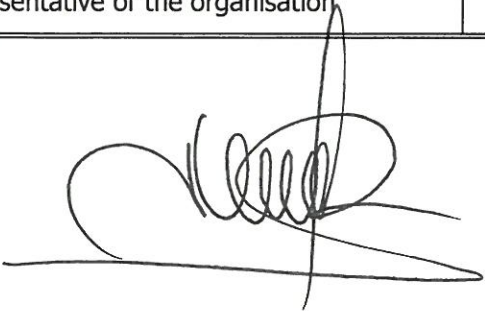
Deletion date of registration	-
Date of next environmental statement	December 2026
Date of next updated environmental statement	December 2026
Request for derogation pursuant to article 7 (YES - NO)	NO
NACE code of activities	62.01
No. of employees	944
Turnover or annual balance sheet	0
2.3 SITE OF ACTIVITIES (GREECE - ATHENS)	
Name	NETCOMPANY S.A.
Address	40 Vasilissis Amalias Ave.
Postal code	10558
Town	Athens
Country/land/region/Autonomous Community	Greece
Contact person:	Ioannis Valtaras / Athina Paraskevopoulou
Tel.	00302106679777
Fax	
Email	ioannis.valtaras@netcompany.com/Athina.paraskevopoulou@netcompany.com
website	https://www.netcompany.com
Public access to the environmental statement or the updated environmental statement	YES
A) Printed form	NO
B) Electronic form	YES
Registration No.	LU-000006
Registration date	December 2025
Suspension date of registration	-
Deletion date of registration	-
Date of next environmental statement	December 2026
Date of next updated environmental statement	December 2026
Request for derogation pursuant to article 7 (YES - NO)	NO
NACE code of activities	62.01
No. of employees	254
Turnover or annual balance sheet	0
2.4. SITE OF ACTIVITIES (BELGIUM - BRUSSELS)	
Name	NETCOMPANY S.A.
Address	Tour Bastion Place du Champ de Mars 5/10
Postal code	1050 Bruxelles
Town	Brussels



[Handwritten signature]

Country/land/region/Autonomous Community	Belgium
Contact person:	Ioannis Valtaras / Athina Paraskevopoulou
Tel.	00302106679777
Fax	
Email	ioannis.valtaras@netcompany.com/Athina.paraskevopoulou@netcompany.com
website	https://www.netcompany.com
Public access to the environmental statement or the updated environmental statement	
A) Printed form	NO
B) Electronic form	YES
Registration No.	LU-000006
Registration date	December 2025
Suspension date of registration	-
Deletion date of registration	-
Date of next environmental statement	December 2026
Date of next updated environmental statement	December 2026
Request for derogation pursuant to article 7 (YES - NO)	NO
NACE code of activities	62.01
No. of employees	49
Turnover or annual balance sheet	32,206,819.05 euros (2024 turnover)
3. ENVIRONMENTAL VERIFIER	
Name of environmental verifier	TÜV AUSTRIA HELLAS
Address	429 Mesogeion Ave.
Town	Agia Paraskevi
Postal code	153 43
Country/land/region/Autonomous Community	Greece
Tel.	210 5220920
Fax	210 5203990
Email	info@tuv-austria-hellas.gr
Registration number of accreditation or licence	EL-V-0006- No. 207- 12
Scope of accreditation or licence (NACE Codes)	10, 11, 18.1, 19.2, 20.1, 20.3, 21, 22.2, 23.7, 24.4 (excluding 24.46), 24.5, 25 (excluding 25.4), 31, 33, 52, 38, 39, 45.1, 45.2, 45.3, 46, 55, 56, 62, 63.1, 64, 65, 66, 70, 71.1, 74 (excluding 74.1 & partially 74.9), 81.2, 82.19, 82.2, 82.92, 84.1, 84.21, 84.23, 84.3, 95.1
Accreditation or Licensing Body (Place)	Hellenic Accreditation System S.A.

Signature of the representative of the organisation	
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S/N	Area	Type	Legal act/Decision	Publ.	Comments	Object	Modifications	Conformity
1	BE	Code on Wellbeing at work (Royal Decree of 28 April 2017)	Code on Wellbeing at work, Book III, title 6, arts. III.6-1 to III.6-11, entry into force 12 June 2017 - safety and health signs	2017	Implementing Directive 92/58/EEC - safety and/or health signs, as amended by Directives 2007/30/CE, 2014/27/UE and Regulation (EU) 2019/1243 of the European Parliament and of the Council of 20 June 2019	Workplace (signs)	No changes	YES Emergency signs, Fire safety signs
2	BE	95/16/EC	EUROPEAN PARLIAMENT AND COUNCIL DIRECTIVE 95/16/EC of 29 June 1995 on the approximation of the laws of the Member States relating to lifts	1995		Lifts		YES
3	BE		Arrêté royal du 10/08/1998, portant exécution de la directive du Parlement européen et du Conseil de l'Union européenne du 29 juin 1995 concernant le rapprochement des législations des Etats membres relatives aux ascenseurs / Koninklijk besluit tot uitvoering van de richtlijn van het Europees Parlement en van de Raad van de Europese Unie van 29 juni 1995 inzake de onderlinge aanpassing van de wetgevingen der Lid-Staten betreffende liften, Monteur' belge du 11/09/1998 p. 29206.	1998		Lifts		YES
4	BE	2004/40/EC	DIRECTIVE 2004/40/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 29 April 2004 on the minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (electromagnetic fields) (18th individual Directive within the meaning of Article 16(1) of Directive 89/391/EEC)	2004		Electromagnetic		YES
5	BE	Royal Decree of 9 March 2003	Royal Decree 09/03/2003 about the safety of elevators	2003	Technical inspections and service / maintenance for lifts	Workplace (elevators)	No changes	YES
6	BE	Code on Wellbeing at work (Royal Decree of 28 April 2017)	Code on Wellbeing at work, Book V, Title 2, arts. V.2-1 to V.2-33, entry into force 12 June 2017 - Noise	2017	Implementing DIRECTIVE 2003/10/EC Evaluate if the workers are exposed to noise	Workplace (Noise)	Amendment art. V.2.30 - minor adjustment to the formalities for applying for a derogation on hearing protectors	YES See noise measurements BRU

7	BE	Law of 22/12/2009	Law of 22/12/2009 imposing a general regulation related to the prohibition to smoke in closed spaces accessible to the public and the protection of workers from the smoke of tobacco	2005	Law on Smoke-Free Enclosed Public Places and Workplaces	Workplace (smoking)	No changes concerning work places	YES No smoking office
8	BE	Code on Wellbeing at work (Royal Decree of 28 April 2017)	Code on Wellbeing at work, Book I, Title 1, arts. 1.5-1 to 1.5-18, entry into force 12 June 2017 - first aid	2017	<ul style="list-style-type: none"> - To organize a frame of instructions to permit an immediate intervention, the evacuation of the injured to and adapt the building (or home, or hospital) - to have a first aid kit adapted to the activity of the employer - to have a medical room if appropriate (medical advisor provides a notice) - to provide for access ways allowing a stretcher to pass through the building - to provide training 	First Aid / Employees' Safety and healthy	Amendment art. 1.5-11: minor adjustments to the conditions to be met by the organizers of first aid training courses	YES First aid kit
9	BE	Arrêté royal du 5 juillet 2011	Législation récente août 2011 Arrêté royal du 5 juillet 2011 modifiant l'arrêté royal du 4 mai 2007 relatif au permis de conduire, à l'aptitude professionnelle et à la formation continue des conducteurs de véhicules des catégories C, C+E, D, D+E et des sous-catégories C1, C1+E, D1, D1+E. Paru dans le Moniteur Belge du 8 août 2011	2011	The temperature at work depends on the physical workload of employees The air temperature cannot be less than: a) 18°C for very light work; b) 16°C for light work; c) 14°C for an average job; d) 12°C for heavy work; e) 10°C for a very heavy work.	Licences		YES
10	BE	Code on Wellbeing at work (Royal Decree of 28 April 2017)	Code on Wellbeing at work, Book V, Title 1, arts. V.1-1 to V.1-16, entry into force 12 June 2017 - thermal environmental factors	2017	<ul style="list-style-type: none"> a) 29°C for a light or very light work; b) 26°C for an average work; c) 22°C for heavy work; d) 18°C for a very heavy work; Or more than:	Workplace (thermal environmental factors)	No changes	YES
11	BE	Code on Wellbeing at work (Royal Decree of 28 April 2017)	Code on Wellbeing at work, Book III, Title 2, arts. III.2-1 to III.2-22, entry into force 12 June 2017 - electrical systems	2017	The electrical system is designed so as to: <ol style="list-style-type: none"> 1. Avoid dangerous surface temperatures or mitigate the risks associated with them; 2. Avoid overheating, fire and explosion or limit the risks associated with it; 3. The manufacturer of electrical equipment is given the related instructions to the users 	Workplace (electrical systems)	Amendment of the references to the General Regulations for Electrical Installations (AREI)	YES

12	BE	Royal Decree	Royal Decree of 16 June 1982 establishing the general method of determining the emission sound of construction plant and equipment	1982, amended since	Applicable for measurements methodology instructions	Noise	No changes	YES (see Noise measurements)
13	BE	Brussels Capital Region Government Decree	Brussels Capital Region Government Decree of 21 November 2002 on the fight against noise and vibrations generated by classified installations	2002, amended since	Regulates noise and vibrations generated by classified installations. Determines the maximum noise levels allowed outside and the maximum vibration levels allowed inside buildings.	Noise	No changes	YES (see Noise measurements)
14	BE	Royal Decree	Royal Decree of 7 July 1994 laying down the basic fire and explosion prevention standards for buildings	1995, amended since	Applies to new buildings and extensions of existing buildings. Requires fire doors by an appointed constructor, lightings and acoustic requirements.	Fire Prevention	Amendments by Royal Decree of 20 May 2022 Article 6/1 : precisions on the required duration of fire resistance Annexes 1, 2/1, 3/1, 4/1, 5/1, 6 and 7 (technical information)	YES
15	BE	Royal Decree (Code on the Wellbeing at work)	Royal Decree of 28 April 2017, arts. III.3-7 to III.3-29, III.1-5, III.5-7, III.5-8, III.5-50, III.6-1 to III.6-11	2017, amended since	Measures to be taken by each employer concerning fire protection, such as risk analysis and prevention plan, evacuation, fire fighting, limiting harmful effects, facilitating the intervention of public emergency services, periodic monitoring and maintenance, internal emergency plan, fire prevention file, training and information of employees. Evacuation routes and emergency exits must lead as directly as possible in a safe place, must be kept clear and cannot be obstructed by objects so they can be used at any time without hindrance. The escape routes, exits and emergency exits must be equipped with appropriate signage. The emergency doors must open in the direction of escape. The employer shall post at the entrance of the building and level an evacuation plan. Measures to be taken by each employer to ensure that workers receive in respect of the signalling safety and health at work, adequate training, particularly in the form of precise instructions. The training referred to in the preceding paragraph shall focus on signalling, including when it involves the use of words, and the general behaviour and specific adaptation required. Required signage, such as a) signage in connection with a prohibition, a warning and an obligation as well as on the location and identification of means of escape or relief, with signs in accordance with the requirements detailed in an Annex in the Code.	Fire Prevention	No changes	YES (risk assessment, fire extinguishers, emergency signs, evacuation drills)

16	BE General Labour Protection Regulations	General Labour Protection Regulations of 11 February 1946, art. 52 - Precautions against fire hazards, explosions and the accidental escape of noxious or flammable gases	1946, amended since	Section 52.2 - Classification of types of stored/used/deposited materials Section 52.3 - Construction (of buildings according to their building date)	Fire Prevention	No changes	YES (risk assessment, fire extinguishers, emergency signs, evacuation drills)
17	BE Directive 2017/2012 (EU)	Directive on the restriction of hazardous substances in electric and electronic equipment	2017	Codification Main Amendments - regarding exemption of lead in white glass intended for optical applications - exemption of cadmium and lead in filtering glass and in glass used for reflective etalons. Transposition of Directive 2011/65/EU and 2016/355/EU	Dangerous Substances	No changes	
18	BE Royal Decree	Royal Decree of 17 March 2013 on the prevention of dangerous substances in electrical and electronic equipment	2013, amended since	Art 4. Information on the prohibition to sell Electrical/Electronic Equipment listed in Annex I that include prohibited substances as per Annex II. Annex I 1. Large Appliances 2. Small Appliances 3. Equipment and telecommunications 4. Consumer equipment 5. Lighting equipment 6. Electrical and electronic tools (with the exception of large tools INDUSTRIAL fixed) 7. Toys, leisure and sport 8. Medical devices (with the exception of all implanted products and infected) 9. Monitoring instruments and control 10. Vending machines 11. Other Electrical/Electronic Equipment Annex II - Substances subject to the limitations set in the Royal Decree, and maximum concentration values tolerated in mass of homogeneous material Art. 5: conformity requirements of products, obligations concerning technical documentation to be provided and conformity declaration	Dangerous Substances	Amendments Annex 3 : List of applications to which the marketing prohibition does not apply Amendments Annex 4 : List of applications to which the marketing prohibition does not apply, specifically for medical devices and measurement and control equipment	YES (WEEE recycling)

19	BE	Royal Decree	Royal Decree of 14 June 2006, amending the Royal Decree of 12 October 2004 on the prevention of hazardous substances in electrical and electronic equipment	2006	Art. 2. From 1 July 2006, it is forbidden to set the market of new electrical and electronic equipment, belonging into category 1, 2, 3, 4, 5, 6, 7 and 10 as listed in Annex I, and as light bulbs and household luminaires containing lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDEs). This prohibition does not apply: i) electrical and electronic equipment put on the market ii) spare parts for the repair of equipment iii) applications of Annex III.	Dangerous Substances	No changes	YES (WEEE recycling)
20	BE	Royal Decree	Royal Decree of 10 December 2007 on the modification of annex III of Royal Decree of 12 October 2004 on the prevention of dangerous substances in electrical and electronic equipment	2007	Art 2 of Annex III of the Royal Decree of 12 October 2004 on prevention of hazardous substances in electrical and electronic equipment is replaced by the text in Schedule to this Order.	Dangerous Substances	No changes	YES (WEEE recycling)
21	BE	Brussels Capital Region Government Decree	Brussels Capital Region Government Decree of 5 March 2009 establishing the list of risk activities	2010, amended since	List of risk activities within the meaning of the ordinance of 5 March 2009 on the management and remediation of contaminated soils	Soil pollution	Update of the attached list (Annex) by Government Decree of 23 June 2022	
22	BE	Brussels Capital Region Ordinance	Brussels Capital Region Ordinance of 14 June 2012 on waste	2012, amended since	General measures to protect the environment and human health by preventing or reducing the generation of waste and the adverse impacts of waste generation and management Regulation of 19 December 2008 relating to the collection of garbage Obligation to sort waste (General unsorted = white bags / paper derivatives = yellow bags / Cars-PVC- recyclable plastics = blue bags) Dangerous needs specialized transporter and at least dispose of it in a managed public garbage	Waste	<u>Abolishment of the Regulation of 19 December 2008</u> by Regulation of 26 January 2023 <u>Several minor amendments of Ordinance of 14 June 2012</u> , by Ordinances of 17 November 2022 and 6 May 2021 Amended by Brussels Capital Region Ordinance of 13 February 2025. No relevant modifications (new art. 9/1 and update art. 49, 6° to regulate recycled granulates).	

23	BE Brussels Capital Region Government Decree	Brussels Capital Region Government Decree of 1 December 2016 on waste management	2017, amended since	<ul style="list-style-type: none"> Rules regarding waste in Brussels Management of waste (tracking, permits, register, quality, transport, etc) Specific rules for management of specific waste Electrical and electronic equipment waste (EEEV) : art 4.1 Oil and edible fat : art 4.2.3 Out of use vehicles : art 4.4 construction site waste prohibition of disposable plastic bag 	Waste	<p><i>Amendments by the Brussels Capital Region Government Decree of 23 June 2022:</i></p> <p><i>Arts. 1.1 en 1.2: definitions en references to EU Directives</i></p> <p><i>Arts. 1.4, 1.5, 1.6 and 1.7: amendments concerning the traceability of waste</i></p> <p><i>Arts. 1.10.1 to 1.12.1: processing of personal data</i></p> <p><i>Arts. 2.1. and 2.2.2: minor changes concerning producer responsibility</i></p> <p><i>Art. 2.3.1: minor changes in the conditions for approval of a body charged by producers with carrying out all or part of the obligations imposed on them</i></p> <p><i>Abolishment art. 2.4.46.\$5: abrogation of the non applicability of extended producer responsibility to a list of specific products</i></p> <p><i>Art. 2.4.49.\$6: when the producer, distributor or retailer has the right to refuse to take back household electrical and electronic equipment waste, they can provide alternative take-back.</i></p> <p>Amended by Brussels Capital Region Government Decree of 24 October 2024: abolition of art. 3, §2, that gave the Regional Agency for Cleanliness exclusive competence for waste collection</p>
24	BE Brussels Capital Region Government Decree	Brussels Capital Region Government Decree of 9 February 2023 on the collection modalities applicable to producers or holders of household waste in the Brussels Capital Region	2023, amended since	Rules on regular waste collection, collection on demand, containers and recycling parks	Waste	

25	BE	EU Regulation 517/2014	Regulation 517/2014 of the European Parliament and of the council of 16 April 2014 on fluorinated gases and abolition of Regulation 842/2006	2015	Technicians who maintain air conditioning systems, must control and avoid any leakage of refrigerant fluid to the atmosphere. Also the technicians and the companies which maintain air conditioning units should be able to provide the respective certificates according to Regulation 517/2014	Air emissions	<p>Repealed by Regulation (EU) 2024/573 of the European Parliament and of the Council of 7 February 2024 on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014. This new Regulation</p> <p>(a) lays down rules on containment, use, recovery, recycling, reclamation and destruction of fluorinated greenhouse gases and on related ancillary measures, such as certification and training, which includes the safe handling of fluorinated greenhouse gases and of alternative substances that are not fluorinated;</p> <p>(b) imposes conditions on the production, import, export, placing on the market, subsequent supply and use of fluorinated greenhouse gases, and of specific products and equipment containing fluorinated greenhouse gases or whose functioning relies upon those gases;</p> <p>(c) imposes conditions on</p>	YES
26	BE	Brussels Capital Region Government Decree	Brussels Capital Region Government Decree of 21 June 2018 on the inspection and maintenance of heating and air-conditioning systems and on the approval of persons performing these operations	2018,	Control operations relating to heating systems, water heaters and air-conditioning systems	Air, climate and energy	Last amended by the law of 27 August 2024	
27	BE	Brussels Capital Region Government Decree	Brussels Capital Region Government Decree of 21 June 2018 the energy performance and indoor climate requirements applicable to the heating systems and air-conditioning systems of buildings upon their installation and during their operation period	2018,	Requirements for proper operation of gas water heaters and boilers and technical requirements for heating systems	Air, climate and energy	Last amended by the law of 4 June 2024	
28	BE	Brussels Capital Region Government Decree	Brussels Capital Region Government Decree of 21 November 2002 on the fight against neighbourhood noise	2002,	Regulates neighbourhood noise, which includes noise generated within buildings. Determines the maximum levels it is allowed to reach outside and inside any building housing human activity.	Noise		

29	<p>BE</p> <p>EU Regulation 2021/1119</p>	<p>Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality, and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law')</p>	<p>2021</p> <p>European Climate Law, establishing the strategic goals of climate neutrality by at the latest 2050 and a reduction of greenhouse gas emissions by at least -55% in 2030 as compared to 1990.</p>	<p>Air, climate and energy</p> <p>YES (Informative)</p>
30	<p>BE</p> <p>EU Regulation 2024/573</p>	<p>Regulation (EU) 2024/573 of the European Parliament and of the Council of 7 February 2024 on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014</p>	<p>2024</p> <p>This Regulation</p> <ul style="list-style-type: none"> (a) lays down rules on containment, use, recovery, recycling, reclamation and destruction of fluorinated greenhouse gases and on related ancillary measures, such as certification and training, which includes the safe handling of fluorinated greenhouse gases and of alternative substances that are not fluorinated; (b) imposes conditions on the production, import, export, placing on the market, subsequent supply and use of fluorinated greenhouse gases, and of specific products and equipment containing fluorinated greenhouse gases or whose functioning relies upon those gases; (c) imposes conditions on specific uses of fluorinated greenhouse gases; (d) establishes quantitative limits for the placing on the market of hydrofluorocarbons; (e) establishes rules on reporting. 	<p>Air, climate and energy</p>
31	<p>BE</p> <p>EU Directive 2024/1275</p>	<p>Directive 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings</p>	<p>2024</p> <p>This Directive promotes the improvement of the energy performance of buildings and the reduction of greenhouse gas emissions from buildings within the Union, with a view to achieving a zero-emission building stock by 2050, taking into account the outdoor climatic conditions, the local conditions, the requirements for indoor environmental quality, and cost-effectiveness.</p>	<p>Air, climate and energy</p>

Brussels Capital Region
Ordinance of 2 May 2013
establishing the Brussels Code
for Air, Climate and Energy
Control (COBRACE - BWILKE)

2013,
amended
since

This Code constitutes the legal foundation for several regional measures regarding energy efficiency (PEB and PLAGÉ), renewable energy, transport (LEZ), air quality and climate. The COBRACE aims to, e.g. minimize energy needs; reduce non-renewable energy sources; improve the energy performance and indoor climate of buildings; improve ambient and indoor air quality; reduce greenhouse gases, persistent organic pollutants and pollutants affecting the stratospheric ozone layer...

Air, climate and
energy

Amended by Brussels
Capital Region Ordinances
of 13 February 2025 and
21 March 2025. The
Ordinance of 13 February
2025 modified various
provisions regarding
energy and climate. A
chapter 7 is inserted in
Title 2 of Book 2 of the
COBRACE entitled
"Energy sobriety
measures" and provides
for the following measures:
- Switching off illuminated
advertisements and
luminous signs (at least)
between 11 PM and 6 AM
- Switching off interior
lighting in shops and
offices (at least) between
11 PM and 6 AM
- Prohibition of open doors
for any building, or part of a
building, heated or cooled
using one or more heating
or air conditioning systems
and opening onto outdoor
spaces
- Prohibition of the use of
heating or air conditioning
devices consuming gas
and operating outside a
building ("gas heaters") as
from June 2026. Moreover,
the Brussels Capital

Regulation (EC) No 1221/2009 of
25 November 2009 on the
voluntary participation by
organisations in a Community eco-
management and audit scheme
(EMAS), repealing Regulation
(EC) No 761/2001 and
Commission Decisions
2001/684/EC and 2006/193/EC

2009,
amended
since

The EMAS-scheme operates on a voluntary basis. The objective of EMAS is to promote continuous improvements in the environmental performance of organisations by the establishment and implementation of environmental management systems by organisations, the systematic, objective and periodic evaluation of the performance of such systems, the provision of information on environmental performance, an open dialogue with the public and other interested parties and the active involvement of employees in organisations and appropriate training.

Environmental
management

Netcompany participates in the
EMAS-scheme

34	BE	Cooperation agreement	Cooperation agreement of 12 May 2017, between the Federal State, the Flemish Region, the Walloon Region, and the Brussels-Capital Region, regarding the implementation of Regulation (EC) No. 1221/2009 of the European Parliament and of the Council of November 25, 2009, on the voluntary participation of organizations in a Community eco-management and audit scheme (EMAS), and repealing Regulation (EC) No. 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC.	2018	The cooperation agreement organises the operationalisation of the EMAS-scheme in Belgium, determining the competent authority and providing several forms to use.	Environmental management	
35	BE	Code on Wellbeing at work (Royal Decree of 28 April 2017)	Code on Wellbeing at work, Book III, Title 3, arts. III.3.-1 to III.3.-29; entry into force 12 June 2017 - fire prevention	2017	Material and organisational measures to be taken based on a risk analysis; prevention, evacuation plan, damage limitation, training and information of employees	Workplace (fire prevention)	
36	LUX	Memorial A 2023, No 232	Law of 16 May 2023 on the transposition of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law	17/05/2023	This law aims to protect whistleblowers and, in particular, requires employers with more than 50 employees to set up internal whistleblowing channels. These procedures must comply with a set of rules to guarantee the confidentiality of the whistleblower's identity and to ensure that reports are dealt with seriously and effectively	Whistleblowing duties	Last amended by the act of 7 November 2017 completing the implementation of Directive 2014/54/EU of 16 April 2014
37	LUX	Memorial A 2018, No 686	Law of 1 August 2018 on the organisation of the National Data Protection Commission on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC	16/08/2018	Businesses and public organisations must take steps to control the governance of personal data within the organisation, a Data Protection Officer ("DPO") may need to be appointed The role of the DPO is to prevent the risks inherent in the processing of personal data from materialising	Designation of a Data Protection Officer ("DPO")	Last amended by the Grand-Ducal Regulation of 30 June 1987 amending the Grand-Ducal Regulation of 12 May 1975 on the organisation and operation of the data processing and contribution collection centre common to social security institutions
38	LUX	Memorial A 2008, 220	Law of 19 December 2008 reforming vocational training and amending the Vocational Training Act see Art. L. 542-1 of the Labour Code	12/30/2008	Continuing vocational training and retraining give everyone the right, throughout their lives, to develop their knowledge and skills, to improve their professional qualifications and to change direction in the light of their personal needs or changes in their economic, technological and social environment	Continuing vocational training and retraining	Not updated since publication

39	LUX	Labour Code	Law of 13 May 2008 introducing a single status for private sector employees and amending the Labour Code see Article L. 313-1 of the Labour Code	5/15/2008	All employees have a responsibility to take care, to the best of their ability, of their own safety and health and that of others affected by their acts or omissions at work	General obligations of the employees on security	Not updated since publication
40	LUX	Regulation (Memorial A 2003, No 34)	Regulation of 24th February 2003 related to the landfill of waste (as modified)	2003	The purpose of this regulation is to support the transition to a circular economy, in compliance with the waste hierarchy and in compliance with the provisions on waste disposal laid down in the amended law of 21 March 2012 on waste, to ensure a gradual reduction in the landfilling of waste, in particular waste that is suitable for recycling or other recovery, and, through stringent technical and operational requirements applicable to waste and landfills, to ensure that waste is not disposed of in landfill sites, to provide for measures and procedures aimed at preventing or reducing as far as possible the negative landfill of waste on the environment, and in particular the pollution of surface water, groundwater, soil and surface on the global environment, including the greenhouse effect, as well as the resulting risks to human health, for the duration of the landfill to human health, throughout the life of the landfill.	Waste	Last amended by the Law of 9th June 2022 (Memorial A 2022, No 271)
41	LUX	Regulation (Memorial A 2007, No 223)	Regulation of 7th December 2007 relating to certain rules for implementing regulation (CE) n°1013/2006 of the European Parliament and of the Council of 14th June 2006 on shipment of waste	2007	This regulation defines the rules of notification for the transfer of waste between states under the authority of the "Administration de l'environnement".	Waste	Last amended by Regulation of 31st August 2016 (Memorial A 2016, No 202)
42	LUX	Law (Memorial A 2008, No 219)	Law of 19th December 2008 relating to batteries and accumulators	2008	This law applies to batteries and accumulators within the scope of article 1 of the law and addresses an array of items including the responsibility of manufacturers, separate waste collection, new recycling methods, financing as well as required information for the final user.	Waste	Last amended by the Law of 9th June 2022 (Memorial A 2022, No 271)
43	LUX	Law (Memorial A 2009, No 82)	Law of 20th April 2009 related to the environmental responsibility with regards to the prevention and reparation of environmental damages	2009	The law aims at establishing a framework for environmental liability based on the "polluter pays", with a view to preventing and remedying environmental damage.	Environment	Last amended by the Law of 6th July 2020 (Memorial A - 578)
44	LUX	Law (Memorial A 2012, No 60)	Law of 21st March 2012 relating to waste (as modified)	2012	This law establishes measures to protect the environment and human health by preventing or reducing the generation of waste and the harmful effects of the generation and management of waste, and by reducing the overall impacts of resource use and improving the efficiency of that use, which are essential for the transition to a circular economy and for competitiveness in the future.	Waste	Last amended by the Law of 27th July 2022 (Memorial A 2022, No 400). However, please note that a draft law amending the law of 21st March 2012 is currently under review (clostier parlementaire 8482 and 8302)

45	LUX	Law (Memorial A 2012, No 205)	Law of 13th September 2012 relating to 1) the creation of a climate pact with the communes 2) amending the law of 31st May 1999 as modified establishing an environmental protection fund	2012	This law aims to promote communes climate commitment. The communes commit by signing a climate pact to be implemented on their territory aiming at reducing greenhouse gas emissions.	Environment	Last amended by Regulation of 29th march 2016 (Memorial A 2016, No 65)
46	LUX	Regulation (Memorial A 2013, No 145)	Law of 30th July 2013 related to the limitation of use of certain dangerous substances in electric and electronic equipment (as modified)	2013	This regulation ensures that electric and electronic equipment (EEE) has been manufactured according to the provisions provided for in Article 3 of the regulation. It also requires the manufacturers of EEE to establish technical documentation and implement an internal control procedure as provided for in Annexe II of the regulation.	Waste	Last amended by Regulation of 24th April 2020 (Memorial A 2020, No 351)
47	LUX	Law (Memorial A 2016, No 202)	Law of 31st August 2016 relating to the transfer of national waste	2016	This law provides for a prior notification procedure and consent procedure for all waste destined to be eliminated and for some of the waste destined for recovery.	Waste	Not updated since publication
48	LUX	Regulation (Memorial A 2016, No 202)	Regulation of 22nd September 2016 regarding the documents accompanying the transfer of national waste	2016	Provides for the documents referred to in Article 2, paragraphs 2 and 4 of the Law of 31st August 2016.	Waste	Not updated since publication
49	LUX	Law (Memorial A 2017, No 330)	Law of 21st March 2017 relating to packaging and packaging waste	2017	This law provides for measures aimed at preventing packaging waste as a first priority and, as other fundamental principles, reuse and preparation for reuse of packaging, recycling and other forms of recovery of packaging waste and, consequently, reducing the final disposal of this waste in order to contribute to the transition towards a circular economy.	Waste	Last amended by the Law of 9th June 2022 (Memorial A 2022, No 270). However, please note that a draft law amending the law of 21st March 2017 is currently under review (dossier parlementaire 8482)
50	LUX	Regulation (Memorial A 2021, No 679)	Regulation of 25th August 2021 determining the procedure for seeking new sites for regional landfill sites for inert waste	2021	In accordance with the guidelines of the national waste and resources management plan, this regulation sets out the procedure for finding new sites for regional landfill sites for inert waste.	Waste	Last amended by Regulation of 1st March 2023 (Memorial A 2023, No 110)
51	LUX	Law (Memorial A 2022, No 266)	Law of 9th June 2022 relating to the waste of electric and electronic equipment	2022	This law aims at reducing the waste of electric and electronic equipment (EEE). As such, it encourages the reuse of EEE where possible and the obligation to collect EEE waste separately.	Waste	Not updated since publication
52	LUX	Regulation (Memorial A 2022, No 268)	Regulation of 9th June 2022 relating to tax warnings determining the methods of application of the tax warning and establishing a catalogue of offences subject to the taxed warning provided for by the amended law of 21st March 2021 on waste	2022	This regulation provides for the determination and application of fines as provided for in the Law of 21st March 2021.	Waste	Not updated since publication

53	LUX	Law (Memorial A 2022, No 269)	Law of 9th June 2022 relating to reducing the impact of certain plastic products on the environment	2022	This law aims to prevent and reduce the impact of certain plastic products on the environment, in particular the aquatic environment, and on human health, as well as to promote the transition to a circular economy with innovative and sustainable business models, products and materials, thereby also contributing to the effective functioning of the internal market.	Waste	Not updated since publication	
54	LUX	Directive	"CSDDD" Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859	To be transposed into Luxembourg	A bill of law is not yet available in Luxembourg. The CSDDD aims at extending due diligence obligations to company's own operators, as well as to the activities of its subsidiaries, business partners, and suppliers.	Corporate sustainability due diligence	Final transposition law not yet published	
55	LUX	Law (Memorial A287 N° doc 8462)	Law of 3 July 2025 establishing an aid scheme to support the transition to a net-zero emissions economy	2025	On 3 July 2025, after obtaining EU Commission approval, Luxembourg adopted a law establishing an aid scheme for the transition to a net-zero economy. The new law creates a national legal basis for public funding to support businesses in their transition to a net-zero emissions economy. It allows for the financing of 1) Aid to decarbonise industrial production processes and 2) Aid for investments in sectors strategic to the transition towards a net-zero economy	Decarbonization	Published in Official Journal the 8/7/2025	
56	GR	Presidential Decree 922/1977	Prohibiting the use of fuel oil in building combustion plants	1977	Boiler room fire protection measures: (Article 1 & 4): The use of fuel oil is prohibited. Each boiler room which has a diesel storage facility of up to 10 tons must be fitted with two fire extinguishers, one Kg CO2 extinguisher and one 12 Kg powder or foam extinguisher.	FIRE PROTECTION		YES: Heating oil is used There are the necessary fire extinguishers in each boiler room.
57	GR	Presidential Decree 71/1988	Presidential Decree 71/1988 on building fire protection regulations, (only applicable for new buildings constructed after 1988)	1988	Building infrastructure specifications on fire safety and fire protection issues	Fire safety - fuels		YES (Fire Safety Certificate)
58	GR	Presidential Decree 396/1994	Presidential Decree 396/1994 - Minimum health and safety requirements for the use by employees of personal protective equipment at the workplace in compliance with Council Directive 89/656/EEC	1994	The employer is obliged to provide the necessary PPE to employees and to provide training to employees about how to use them.	PPE		YES: No PPE is required for office work in line with the occupational risk assessment study. Warehouse employees have been provided with the necessary PPE. The means of protection in the event of fire (fire fighting tools) have also been checked and are available.

59	GR	<u>Presidential Decree 395/1994</u>	Presidential Decree 395/1994 - Minimum health and safety requirements for the use by employees of personal protective equipment at the workplace in compliance with Council Directive 89/655/EEC	1994	The employer is obliged to provide the necessary PPE to employees and to provide training to employees about how to use them.	PPE	YES: No PPE is required for office work in line with the occupational risk assessment study. Warehouse employees have been provided with the necessary PPE. The means of protection in the event of fire (fire fighting tools) have also been checked and are available.
60	GR	<u>Decision 7181 Φ.700.1, Fire Service Decree 6/1996</u>	Decision 7181 Φ.700.1, Fire Service Decree 6/1996 - Taking of fire protection measures in warehouses	1996	Width of escape routes: (Article 3.1) - 0.9 m Emergency exits: (Article 3.2) - 1 emergency exit Safety lighting: (Article 3.3) Signage: (Article 3.4) Prohibition on smoking and use of naked flames: (Article 5d) Fire extinguishers per 30 m Staff organisation and training: (Article 8) Fire protection design - Not required for Zo	FIRE FIGHTING	YES: The following rules must be complied with: Width of escape routes = 0.9 m Emergency exits = 1 emergency exit Safety lighting: Signage Smoking ban Fire extinguishers per 30 m Staff training
61	GR	<u>Ministerial Decision 33940/7590/1998</u>	Ministerial Decision 33940/7590/1998 - Amendment and supplementation of Presidential Decree 71/1988 on building fire protection regulations (Government Gazette 32/A corrigendum 59/A)	1998		FIRE PROTECTION	YES
62	GR	<u>Ministerial Decision T. 6525/421/A0019/2000</u>	Ministerial Decision T. 6525/421/A0019/2000 - Conditions, terms, procedure for operating warehouses or temporary storage areas for goods managed by natural or legal persons other than the Customs Authorities	2000		WAREHOUSES	YES
63	GR	<u>Law 2874/2000</u>	Law 2874/2000 - Promotion of employment and other provisions	2000	See Law 3850/2010	SAFETY TECHNICIAN	YES
64	GR	<u>Ministerial Decision 3060(QOP) 238/2002</u>	Ministerial Decision 3060(QOP) 238/2002 - Measures to protect the public from the operation of low frequency electromagnetic field emission devices	2002	Exposure of the public to low frequency electromagnetic fields: (Article 2) Basic restrictions for low frequency electrical, magnetic and electromagnetic fields: (Article 2 table 1) Reference levels for low frequency electrical, magnetic and electromagnetic fields (rms values): (Article 2 table 2) Reference levels for contact currents from conductive bodies (f in kHz): (Article 2 table 3) Competent Services: (Article 3)	RADIATION, Electromagnetic fields	YES: See INTRACOM Telecom measurements (1140E1028RS1_RE_expo_INTR ASOFT 1140E1028RS2_ELF_expo_INTR ASOFT)

65	GR	<u>Corrigendum/2002</u>	Corrigendum/2002 - Correction of error in Ministerial Decision No. 3080/(ΦCP) 238/02 (Government Gazette 512/B) on measures to protect the public from the operation of low frequency electromagnetic field emission devices	2002		RADIATION, Electromagnetic fields	YES: See INTRACOM Telecom measurements (1140E1028RS1_RE_expo_INTRASOFT 1140E1028RS2_ELF_expo_INTRASOFT)
66	GR	<u>Law 3144/2003</u>	Law 3144/2003 - Social dialogue to promote employment and social protection and other provisions	2003	Safety technician: (Article 9) Occupational Physician: (Article 9, §1.2)	SAFETY TECHNICIAN	YES
67	GR	<u>Ministerial Decision 131784/2003</u>	Ministerial Decision 131784/2003 - Training of university and technological educational institute-level safety technicians	2003		SAFETY TECHNICIAN	YES: The safety technician (Apostolos Papadotis) is a qualified engineer. Electrical Engineer
68	GR	<u>Ministerial Decision Φ. 7.5/18/6/88/2004</u>	Ministerial Decision Φ. 7.5/18/6/88/2004 - Replacement of the current Internal Electrical Installations Regulations with the ELOT HD 384 standard and other relevant provisions	2004	New Greek standard for electrical installations: (Article 1) Ground foundations: (Article 2) Overvoltage protection: (Article 3) Cable colour characterisation: (Article 4) Checks & re-checks of electrical installations: (Article 5)	Electrical installations	YES: the requirements of HD 384 were complied with when constructing the panels (e.g. safety relays)
69	GR	<u>Ministerial Decision 618/43/2005</u>	Ministerial Decision 618/43/2005 - conditions for placing fire extinguishers on the market, maintenance, re-inspection and refilling procedures	2005	First release of fire extinguishers: (Article 2) Relevant standards - requirements: (Article 3) Fire extinguisher signage: (Article 4) Periodic re-inspection - maintenance - refilling of fire extinguishers: (Article 5) Penalties: (Article 6) Content of technical file: (Annex I) Type of fire extinguisher maintenance: (Annex II) Maintenance periods and maximum operating life of fire extinguishers: (Annex III) Description of maintenance procedures by the competent person: (Annex IV) Description of fire extinguisher maintenance procedures by the recognised company: (Annex V) Description of fire extinguisher in-depth inspection procedures: (Annex VI)	FIRE PROTECTION - Amendment of Ministerial Decision No. 17230/67/1/2005	YES: Fire extinguisher labelling, fire extinguisher maintenance, fire-fighting equipment inspection log
70	GR	<u>Ministerial Decision 17230/67/1/2005</u>	Ministerial Decision 17230/67/1/2005 - amendment of Joint Decision No. 618/43/05 (Government Gazette 52/B) of the Ministers of Development and Public Order on conditions for placing fire extinguishers on the market, maintenance, re-inspection and refilling procedures.	2005	Amends Ministerial Decision No. 618/43/05	FIRE PROTECTION	YES

78						
77	GR	<u>Ministerial Decision No. ok. 7077/444/φ. 15/2009</u>	2009	Ministerial Decision No. ok. 7077/444/φ. 15/2009 - Supplementation of Joint Ministerial Decision No. φ15/ok. 1589/104/2006 (Government Gazette 90/B) on the taking of fire protection measures at industrial - handicraft facilities, professional workshops...	FIRE PROTECTION	YES (valid fire protection certificate)
76	GR	<u>Ministerial Decision 50292/3549/08/2009</u>	2009	Ministerial Decision 50292/3549/08/2009 - Supplying vehicles with portable fire extinguishers	FIRE PROTECTION - FIRE EXTINGUISHERS	YES: During MOT inspections, the existence of a fire extinguisher in employee vehicles is also checked.
75	GR	<u>Ministerial Decision No. 2300 EΦA/4931/2008</u>	2008	Ministerial Decision 2300 EΦA/4931/2008 - Method for conducting measurements to comply with safe exposure limits for the public to electromagnetic radiation from each antenna	RADIATION	YES: See INTRACOM Telecom measurements (1140E1028RS1_RF_expo_INTR ASOFT 1140E1028RS2 ELF_expo_INTR ASOFT)
74	GR	<u>Ministerial Decision No. ok. φ. A9.2/01K. 28425/2008</u>	2008	Ministerial Decision No. ok. φ. A9.2/01K. 28425/2008 - Supplementation of provisions on the installation, operation, maintenance and safety of lifts	Operation of lifts	YES: Lift maintenance, suitability certificate
73	GR	<u>Fire Service Decree 13/2008</u>	2008	Fire Service Decree 13/2008 - Laying down the procedure for granting fire protection certificates to undertakings located within buildings.	FIRE PROTECTION	YES: Existence of fire protection certificate
72	GR	<u>Law 3511/2006</u>	2006	Law 3511/2006 - Reorganisation of the Fire Service, upgrading of its mission and other provisions	FIRE PROTECTION	YES
71	GR	<u>Ministerial Decision φ15/ok. 1589/104/2006</u>	2006	Ministerial Decision φ15/ok. 1589/104/2006 - Taking of fire protection measures at industrial - handicraft facilities, professional workshops, warehouses and mechanical service facilities subject to the provisions of Law 3325/2005 (Government Gazette 68/A) and other activities	FIRE PROTECTION	YES: Fire safety team, trained on theoretical and practical issued by the Fire Service, duties of members and leader known.
70				Table showing composition of fire protection team: (Annex A) Duties and obligations of members of the fire protection team (leader, deputy leader, staff): (Annex A) Instructions for setting up a fire protection team: (Annex B) Fire protection team training: (Annex B §A) Duties and obligations of fire chief: (Annex B §C) Fire protection team training courses: (Annex C) Fire Safety Team Instructions: (Annex D)		
70				Fire Service Decrees: (Article 14) Inspection of extinguishing agents & materials: (Article 15)	FIRE PROTECTION	
70				Fire protection certificate	FIRE PROTECTION	
70				Registration of lift with the competent service, maintenance and periodic checks and tests	Operation of lifts	
70				Regulations on measurements of electromagnetic radiation levels in the environment of antenna stations: (Annex)	RADIATION	
70				Fire extinguisher specifications: (Article 2) Fire extinguishers required per vehicle category: (Article 3) Checks: (Article 4)	FIRE PROTECTION - FIRE EXTINGUISHERS	
70				Ministerial Decision No. ok. 7077/444/φ. 15/2009 - Supplementation of Joint Ministerial Decision No. φ15/ok. 1589/104/2006 (Government Gazette 90/B) on the taking of fire protection measures at industrial - handicraft facilities, professional workshops...	FIRE PROTECTION	
70				1308 φ. 701.2/2010 - Applicable fire protection legislation - Duration of validity of fire protection certificate	FIRE PROTECTION	YES Existence of a valid fire protection certificate. Valid for 5 years

79	GR	<u>Ministerial Decision 1783/64/2010</u>	Ministerial Decision 1783/64/2010 - Permanent fire fighting systems	2010	From the date on which this decision takes effect, the sale or shipment of the relevant products without the CE marking shall be prohibited.	Article 6 FIRE PROTECTION	FIRE PROTECTION	YES Fire-fighting systems have CE marking.
80	GR	<u>Ministerial Decision 1782/63/2010</u>	Ministerial Decision 1782/63/2010 - Fire detection and alarm systems, smoke and heat control systems, permanent fire-fighting systems and smoke detector devices	2010	Article 6 From the date on which this decision takes effect, the sale or shipment of the relevant products without the CE marking shall be prohibited.	FIRE PROTECTION	FIRE PROTECTION	YES Fire-fighting systems have CE marking.
81	GR	<u>Fire Service Decree No. 13a/2010</u>	Fire Service Decree 13a/2010 - Amendment of Fire Service Decree No. 13/2008 laying down the procedure for granting fire protection certificates to undertakings located within buildings	2010		FIRE SAFETY	FIRE SAFETY	YES Existence of a valid fire protection certificate. Valid for 5 years
82	GR	<u>Fire Service Decree 12b/2010/2010</u>	Fire Service Decree 12b/2010/2010 – Establishment of an active fire protection equipment inspection and maintenance log for undertakings or facilities and repeal of Fire Service Decrees Nos. 12/2007 and 12a/2008	2010	Establishment of an active fire protection equipment inspection and maintenance log	FIRE SAFETY	FIRE SAFETY	YES: There is an active fire protection equipment inspection and maintenance log
83	GR	<u>Ministerial Decision Φ 50/ok. 13286/152/2010</u>	Ministerial Decision Φ 50/ok. 13286/152/2010 - Amendment of Decision No. Φ 7.5/1816/88/27.2.2004 of the Deputy Minister of Development on replacement of the current Internal Electrical Installations Regulations with the ELOT HD 384 standard and other relevant provisions (Government Gazette 470/B/5.3.2004)	2010	Internal Electrical Installations Regulations ELOT HD 384	Electrical installations	Electrical installations	YES: the requirements of HD 384 were complied with when constructing the panels (e.g. safety relays)
84	GR	<u>Decision 12/2012</u>	Decision No. 12/2012 – establishment of a maintenance and proper operation inspection log for active fire protection equipment at undertakings – facilities	2012	Mandatory keeping of the Active Equipment Inspection and Maintenance Log Fire protection Active protection equipment inspection and maintenance log: (Annex)	FIRE SAFETY	FIRE SAFETY	YES There is an active fire protection equipment inspection and maintenance log

85	GR	<u>Decision 13/2012</u>	Decision 13/2012 - Procedure for issuing (active) fire protection certificates to undertakings - facilities	2012	The active fire protection certificate for buildings falling within the provisions of Presidential Decree 71/1988 (Government Gazette 32/A) is valid for 5 years.	FIRE SAFETY	YES Existence of a valid fire protection certificate. Valid for 5 years
86	GR	<u>Law 4144/2013</u>	Law 4144/2013 - Tracking social security and labour market fraud and other provisions within the remit of the Ministry of Labour, Social Security and Welfare	2013	Provisions on health and safety at work (Article 36) Allocation of working time for safety technician, occupational physician (Article 36) System for checking compliance with stated hours of safety technician and occupational physician (Article 76)	Arrangements for occupational health and safety	YES (Informative)
87	GR	<u>Fire Service Decree No. 13/2013</u>	Fire Service Decree No. 13/2013: Simplification of procedure for issuing (active) fire protection certificates to businesses - facilities and amendment of Fire Service Decree No. 12/2012	2013	(Article 1) Procedure for issuing an active fire protection certificate. (Article 2) Active fire protection certificate - applicable fire protection legislation. (Article 4) Granting an interim active fire protection certificate	Fire protection	YES: current certificates, compliance with procedure for obtaining new ones
88	GR	<u>Ministerial Decision No. ok. 32205/A/10.96/2013</u>	Ministerial Decision No. ok. 32205/A/10.96/2013 - Minimum first aid materials required in the workplace	2013	The minimum materials required for first aid areas and pharmacies in the workplace (list of 29 entries)	Arrangements for occupational health and safety	YES: Pharmaceutical materials available at building B3 infirmary and pharmacies
89	GR	<u>Circular No. ok. 36901/A/10.114/2013</u>	CIRCULAR No. 36901/A/10.114/2013 - Ministerial Decision No. 32205/A/10.96/2013 on minimum first aid materials required in the workplace	2013	"Central" pharmacies contain the full pharmaceutical material specified, while other pharmacies located near workplaces may adjust their stock according to the characteristics of the undertaking	Arrangements for occupational health and safety	YES: Pharmaceutical materials available at building B3 infirmary and pharmacies
90	GR	<u>Ministerial Decision of 22-8-2014, Government Gazette 2434/B/2014</u>	Organisation, training and briefing of staff at undertakings – facilities on fire protection issues	2014	Establishment of the Fire Protection Team Basic training and briefing of the Fire Protection Team Supplementary and special training, briefings and drills of the Fire Protection Team Duties of the business - facility manager Duties of the head of the Fire Protection Team Duties of the deputy leader of the Fire Protection Team Duties of members of the Fire Protection Team Staff obligations Auxiliary tools and equipment for businesses - facilities Certification from the Training and Re-training School of the Fire Service Academy and establishment of the Fire Protection Team Organisation and Training Book	Fire protection	YES: Relevant training

91	GR	Ministerial Decision 14980 Φ. 700/5/2015 - (Fire Service Decree No. 3/2015) Fire protection measures and equipment for public meeting places	2015	Determination of the number of exits and width in relation to the number of people meet at the venue. Taking preventative measures such as posting signs at obvious locations in the area, continuous cleaning of all areas, diligent maintenance, regular inspection and control of electrical facilities, clearing of dry grass from outdoor areas and removal thereof.	Fire protection	YES
92	GR	Ministerial Decision 10520/213/2015 10520/213/2015 - Training of employers and employees on issues relating to the performance of safety technician duties in category B and C undertakings	2015	Employee training course	Safety technician	YES
93	GR	Ministerial Decision 3275 Φ. 700/17/2016 (Government Gazette 388/Β/19.2.2016) (Fire Service Decree No. 17/2016) on fire protection measures and equipment for offices	2016	<p>It specifies the following:</p> <ul style="list-style-type: none"> - number and width of emergency exits - minimum width and height of stairs on staircases used as escape exits - lighting and safety signage <p>- determination of preventative fire protection measures (installation of signs with fire prevention instructions, diligent maintenance and control of electrical facilities, adequate ventilation and lighting of storage areas)</p> <p>- active fire protection measures (portable fire extinguishers, automatic fire detection system, permanent water supply fire fighting network)</p> <p>- fire protection design (it is mandatory to submit floor plans to the Fire Service to lay down fire protection measures)</p> <p>- includes a model for a fire protection design for office buildings.</p>	Fire protection	YES
94	GR	Ministerial Decision 39507/167/Φ. 9.2/2016 - (Government Gazette 1047/Β/13.4.2016) - Transposition of Directive 2014/33/EU of the European Parliament and of the Council of 26 February 2014 on the harmonisation of the laws of the Member States relating to lifts and safety components for lifts into Greek law	2016	Maintenance and periodic checks and tests - safety components for lifts	Operation of lifts	YES: Lift maintenance, suitability certificate
95	GR	Circular No. ok. 22451/70/Φ. 9.2/2017 22451/70/Φ. 9.2/2017 (Government Gazette -- /222.2017) - Provisions relating to lifts - Competences of Municipalities and Regions	2017	Laying down procedures for controlling lift operations and accident management	Operation of lifts	YES: Lift maintenance, suitability certificate

96	GR	Ministerial Decision No. ok. 23455/1491/2017	Ministerial Decision No. ok. 23455/1491/2017 (Government Gazette 1962/B/7.6.2017) - Training of employers and employees on issues relating to the performance of safety technician duties in category B and C undertakings - 2017 programmes	2017	Training of employers and employees about how to perform safety technician duties at category B Safety technician and C undertakings	YES
97	GR	Presidential Decree 120/2016 (Government Gazette 203/A/26.10.2017)	Presidential Decree 120/2016 (Government Gazette 203/A/26.10.2017) - Transposition of Directive 2013/35/EU on the minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (electromagnetic fields) (20th individual Directive within the meaning of Article 16(1) of Directive 89/391/EEC) and repealing Directive 2004/40/EC (OJ L 179/1 of 29.6.2013)	2017	Protecting employees from exposure to risks from physical agents (electromagnetic fields, etc.)	Risks arising from physical agents YES
98	GR	Ministerial Decision 50067/28/2017 (Government Gazette 3952/B/10.11.2017)	Ministerial Decision 50067/28/2017 (Government Gazette 3952/B/10.11.2017) Online Safety Technician database and procedure for assigning safety technician duties via the Labour Inspectorate's MIS system	2017	Obligation to electronically record safety technician data	Safety technician YES
99	GR	Ministerial Decision 16974/758/2018 (Government Gazette 1242/B/4.4.2018)	Ministerial Decision 16974/758/2018 (Government Gazette 1242/B/4.4.2018) amending Ministerial Decision No 50067/28/27.11.2017 on the online safety technician database and procedure for assigning safety technician duties via the Labour Inspectorate's MIS system.	2018	Obligation to electronically record safety technician data	Safety technician YES
100	GR	Presidential Decree 41/2018 (Government Gazette 80/A/7.5.2018)	Presidential Decree 41/2018 (Government Gazette 80/A/7.5.2018) - Building Fire Protection Regulations	2018	The Building Fire Protection Regulations lay down requirements and measures to: a) protect the life and health of employees. b) prevent the spread of fires. c) protect buildings and their contents. The Regulation applies to new buildings or extensions to existing buildings.	Fire protection YES

101	GR	Ministerial Decision 32126/1463/2018 (Government Gazette 2404/B/25.6.2018)	Ministerial Decision 32126/1463/2018 (Government Gazette 2404/B/25.6.2018) amending Ministerial Decision No. 50067/28/27.11.2017 on the online safety technician database and procedure for assigning safety technician duties via the Labour Inspectorate's MIS system	2018	Obligation to electronically record safety technician data	Safety technician	YES
102	GR	Ministerial Decision 17314/A9.914/2019 (GG 1470/B/3.5.2019)	Ministerial Decision 17314/A9.914/2019 (Government Gazette 1470/B/3.5.2019) amending Ministerial Decision No. 50067/28/27.11.2017 on the online safety technician database and procedure for assigning safety technician duties via the Labour Inspectorate's MIS system.	2019	Electronic database for recording safety technician data	Safety technician	Full compliance
103	GR	Circular No. Δ16α/Π.οκ.40957/2019	Circular No. Δ16α/Π.οκ.40957/2019 - Prevention of impacts resulting from the appearance of high temperatures and heat waves	2019	Pathological conditions caused by high temperatures and instructions for dealing with them General precautionary guidelines	Protection from weather phenomena	Full compliance
104	GR	Circular No. 70942 Φ.701.2/2019 (GG 1-5.11.2019)	Specifying the procedure and supporting documents required to approve active fire protection designs	2019	Specifying the procedure and supporting documents required to approve active fire protection designs	Fire protection	Full compliance
105	GR	Ministerial Decision 68781/2019 (Government Gazette 2760/B/3.7.2019)	Amendment of Joint Ministerial Decision No. Φ.Α/9.2/Οκ.28425/1245/22.12.2008 (Government Gazette 2604/B) supplementing the provisions on the installation, operation, maintenance and safety of lifts.	2019	Laying down elevator operating control procedures	Lifts	Full compliance
106	GR	Ministerial Decision No. οκ.223083/Φ.700.19/2020 (Government Gazette 2233/Β/11.6.2020)	Approval of Fire Service Decree No. 19/2020 on the procedure for imposing administrative fines for infringements of regulatory provisions of the fire protection legislation.	2020	Imposition of administrative fines for infringements of regulatory provisions	Fire safety	Full compliance
107	GR	Ministerial Decision 27152 οκ. Φ.700.19/2021 (GG 2757/Β/28.6.2021)	Amendment of Decision No. 23083 Φ.700.19/11.6.2020 of the Deputy Ministers of Finance and Citizen Protection on: "Approval of Fire Service Decree No. 19/2020 on the procedure for imposing administrative fines for infringements of regulatory provisions of the fire protection legislation" (Government Gazette 2233/Β)	2021	Amendment of Law 23083 Φ.700.19/11.6.2020. Laying down the procedure for imposing administrative fines for infringements of regulatory provisions	Fire protection	Full compliance

108	GR	Ministerial Decision 83324/2023 (Government Gazette 5689/B/31.9.2023)	Safety technician areas of specialisation in accordance with Article 13 of the Code of Occupational Health and Safety Laws (Law 3850, Government Gazette 84/A)	2023	The Safety Technicians areas of specialisation are specified.	Safety technician	Full compliance
109	GR	Joint Ministerial Decision No. YTIEN/A ETEA/26201/171	A programme to improve the energy efficiency of tertiary sector undertakings.	3/11/2024	It outlines the terms and conditions for participation in the Programme, eligible codes of economic activity, eligible expenditure, supporting documents, the submission procedure, deadlines, etc.	Energy	Full compliance
110	GR	KYA 617	Online service "Submission of report or complaint on fire protection issues for undertakings and facilities."	3/8/2024	This relates to the procedure for submitting a report or complaint about fire protection issues for undertakings and facilities.	Fire protection	Full compliance
111	GR	Joint Ministerial Decision No. 8494 Φ.708.2	Risk assessment and classification of economic activities/facilities into risk levels - methodology for planning, scheduling and frequency of checks in the context of supervising economic activities/facilities in accordance with the regulatory provisions on fire protection within the remit of the Fire Service.	3/28/2024	This relates to evaluation of the hazardousness of activities and the frequency with which they are checked.	Fire protection	Full compliance
112	GR	Joint Ministerial Decision No. 22888 Φ.700.19	Approval of Fire Service Decree No. 19/2024 on: "Laying down the method, type and procedure for imposing and collecting the administrative fine, the procedure for filing objections, and all other modalities needed to implement Article 167(3) of Law 4862/2020 (Government Gazette 27/A) on infringements of the regulatory provisions on fire protection within the remit of the Fire Service."	5/1/2024	This relates to infringements, fines, weighting coefficients and the procedure for the Fire Service imposing such fines.	Fire protection	Full compliance
113	GR	Ministerial Decision No. 96038 (Government Gazette 7589/B/31.12.2024)	Laying down the procedure, content and supporting documents, fees and sanctions for notifying the operation of the data centres referred to in Article 321 of Law 4442/2016	2024	This relates to the procedure for notifying the operation of data centres, the obligations of their bodies and sanctions for non-compliance.	Permitting	Full compliance

114	GR	Regulation (EU) 2025/40	REGULATION (EU) 2025/40 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904 and repealing Directive 94/62/EC.	2025	This relates to laying down requirements for the entire lifecycle of packaging in terms of environmental sustainability and labelling.	Solid waste	Regulation (EU) 2019/1020 and Directive (EU) 2019/904 are amended. Directive (EC) No 94/62 is repealed apart from the Articles referred to in Article 70 of the Regulation.	Full compliance
115	GR	Directive 2025/794/EU	DIRECTIVE (EU) 2025/794 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 April 2025 amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements.	2025	This relates to the dates of implementation of certain sustainability and due diligence requirements.	Energy	Directive (EU) 2022/2464 and Directive (EU) 2024/1760 are amended.	Full compliance
116	GR	Joint Ministerial Decision No. 10236 OK. Φ. 708.5 (Government Gazette 1686/B/7.4.2025)	Laying down and procedure for imposing administrative measures and sanctions on economic operators and facilities for infringements of the regulatory provisions on fire protection within the remit of the Fire Service.	2025	This relates to the determination of sanctions and the procedure for imposing them for infringements of the regulatory provisions on fire protection by economic operators and facilities in the context of inspections carried out by the Fire Service.	Fire protection	Article 13 of Presidential Decree 13 (Government Gazette 5519/B/29.11.2021) is repealed.	Full compliance
117	GR	Delegated Decision 2025/934/EU	COMMISSION DELEGATED DECISION (EU) 2025/934 of 5 March 2025 amending Decision 2000/532/EC as regards an update of the list of waste in relation to battery-related waste.	2025	This concerns battery-related waste.	Solid waste	The Annex to Decision 2000/532/EC is amended.	Full compliance
118	GR	Joint Ministerial Decision No. 59210 (Government Gazette 4123/B/29.7.2025)	Development, operation and keeping of the lift inventory register referred to in Article 11(A5) of Law 3982/2011.	2025	This relates to laying down technical issues and procedures for setting up, running and maintaining the digital lift inventory register which will record all lifts installed in Greece.	Lifts		Full compliance
119	GR	Joint Ministerial Decision No. ΥΠΕΝ/Α ΕΠΕΑΥ/9489/637 (Government Gazette 3686/B/15.07.2025)	Approval of the road map on energy savings in buildings in accordance with Article 25A of Law 4342/2015 (Government Gazette 1431A).	2025	This relates to approval of a strategic plan (Roadmap) for 2030 which sets priorities and presents innovative financing tools to achieve national energy savings targets in the building sector.	Energy		Full compliance

