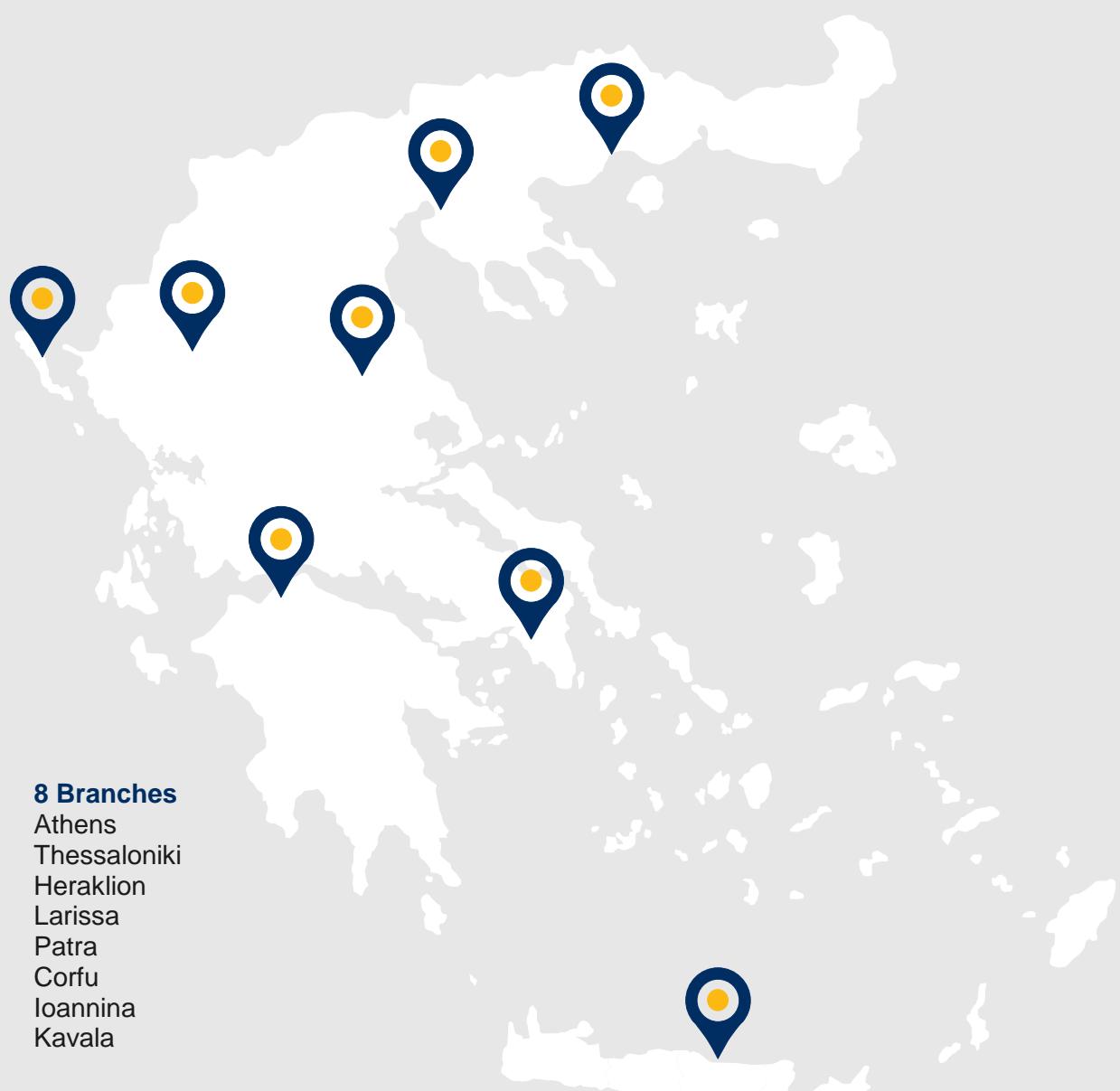


# UPDATED TRANSPARENCY REPORT

MAY 2020



## Our network in Greece



### 8 Branches

Athens  
Thessaloniki  
Heraklion  
Larissa  
Patra  
Corfu  
Ioannina  
Kavala

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### TRANSPARENCY REPORT

APRIL 2020

### ISSUER

Crowe Greece

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## I. Introduction - General

This Transparency Report is prepared in implementation of the provisions of article 45 L. 4449/2017 “On the statutory audit of annual and consolidated financial statements and public supervision of the audit work and other provisions” and article 13 of Regulation (EU) No. 537/2014 of the European Parliament and of the Council of 16 April 2014 “on specific requirements regarding statutory audit of public-interest entities and repealing Commission Decision 2005/909/EC Text with EEA relevance”.

In January 2017 was voted the L. 4449/2017 (G.G. A 7/24-1-2017) which incorporated into Greek Law the Directive 2014/56/EU of the European Parliament and of the Council, amending Directive 2006/43/EC of 17 May 2016 based on which L. 3693/2008 was adopted. We also note that Regulation (EU) No. 537/2014 of the European Parliament and of the Council of 16 April 2014 has applied since 17 June 2016.

According to article 45 of L. 4449/2017 and article 13 of the above Regulation No. 537/2014 the Certified Public Accountants or the Audit Firms publish an annual transparency report.

In compliance with the requirements of the above article 13 of Regulation 537/2014/EU, statutory auditors and audit firms are required within four months from the end of the calendar year to submit to the Hellenic Accounting and Auditing Standards Oversight Board (AAOB) and publish on their web site an annual Transparency Report, disclosing certain data and information to which we refer extensively and in detail in the following specific chapters.

**The update of the transparency report posted on the firm's web site and submitted to the Hellenic Accounting and Auditing Standards Oversight Board (AAOB) on 29.04.2020, concerns modification in the tables of the chapter “F. LIST AND FULL INFORMATION ON PUBLIC INTEREST ENTITIES” (page 60 and 61) as follows:**

- a) The company “EUROPEAN UNION MINETTA INSURANCES S.A.” was listed by mistake in the table of “Listed on Athens Stock Exchange Companies” instead of the table of “Banks and Insurance companies”, in which it was transferred, and
- b) In the table “Listed on Athens Stock Exchange Companies” was included by mistake also the company “EPSILON NET S.A.”, which is not listed on the main market, but on the alternative market and, therefore, it was deleted.

The Certified Public Accountants and the audit firms as defined by art 2 of L. 4449/2017 perform the statutory audit of the separate and consolidated financial statements which is provided by the guidelines of the European Union and National Law or carried out voluntarily, as well as audit work of any nature and scope provided by the existing legislation.

According to article 65A of L. 4174/2013, as amended by article 37 of L. 4646/2019 and in force, Certified Public Accountants and the audit firms also perform tax audit and issue an annual tax audit certificate to the companies the financial statements of which are subject to statutory audit. From 01/01/2016 and onwards, according to article 56 of L. 4410/2016, the issue of the tax certificate became optional.

Our firm in the year 2019, despite the problems in Greek economy that continue as a result of the crisis, managed thanks to its Management, the ethics, the adequacy and the skilfulness of its members, but also the trust that our audited collaborators and the market have in us, to maintain its turnover at the same levels as the previous year and continue to remain first in human resources and in a number of audited companies and ranks in the top two in terms of economic figures, above all, multinational and Greek, auditing firms.

Our firm also in the year 2019 proceeded to a number of investments in technical equipment (e.g. electronic computers and systems, IT tools and programmes), audit methodology, significant improvements to building installations with the purpose of creating the best possible conditions for our staff, educational and training seminars of our members. It also maintained and reinforced the scientific committees with special consultants, established for the firm's needs in previous years. At the same time, it managed its operating expenses very sparingly.

By the present report, which was approved by the Board of Directors on 27 April 2020, we meet the requirements of art. 45 L. 4449/2017, for the preparation and publication of the annual transparency report once again.

Let us, therefore, before laying out overall information on audit policies, processes and methodologies of our firm, present our corporate identity.

## **HISTORICAL BACKGROUND**

The Audit Firm was first established on 29 April 1993, under the company name "ASSOCIATED CERTIFIED PUBLIC ACCOUNTANTS s.a." from the overwhelming majority of the members of the Soma Orkoton Logiston (Body of Certified Public Accountants) "SOL", with a view to continuing and expanding its activity, which is practiced since 1956 by "SOL", as a sole entity of the recognised auditing-accounting profession, in accordance with L. 3329/55, the validity of which expired on 30 April 1993.

Our members, deriving either from the Soma Orkoton Logiston ("SOL"), or the Institute of Certified Public Accountants (SOEL) that succeeded it, have taken the lead in auditing, both concerning institutions, as also those concerning the transparency, independence, integrity and adequacy of the work of Certified Public Accountants.

The firm provides professional services of audit and review of financial statements, accounting and tax advice and services, internal audit services, as well as special services of business valuations, mergers and acquisitions and appraisal services for specific auditing projects.

Today among more than 50 auditing firms that operate under the new regulatory regime of the P.D. 226/92, L. 3148/2003, L. 3919/2011, L. 4170/2013, L. 4449/2017 etc. as subsequently amended by various other requirements and in force, the audit firm “ASSOCIATED CERTIFIED PUBLIC ACCOUNTANTS s.a.” (Member of Crowe Global):

- Is the largest firm of certified public accountants auditors in the country and ranks amongst the top national firms of certified auditors accountants of Europe.
- It carries out more audits than all other audit firms, providing its services to more than 4.000 enterprises of the private mainly, but also of the broad Public sector.
- It is manned by the largest number of certified auditors accountants, but also by the largest number of total auditors employed by a company operating in Greece.
- It maintains a wide network of branches, offices and agents in Greece, making the most of the scientific resources of the local communities.

The firm with remarkable presence in the professional practice and the social role of economic scientists is proven, since its incorporation, the leader of the sector, adhering to its values and relying on its members the qualifications of which are as follows:

## **QUALIFICATIONS OF OUR MEMBERS**

- Shareholders certified auditors accountants members of ASSOCIATED CERTIFIED PUBLIC ACCOUNTANTS s.a., several of whom originate from the Soma Orkoton Logiston (“SOL”), have past experience in auditing between 20 and 40 years.
- Our members attain at least a University degree in Economics.
- Have accomplished or are undertaking postgraduate studies at Greek Universities but also abroad while others hold a second University degree or Master’s degree.
- All of our auditors attain or are in the process of attaining a professional postgraduate degree (SOEL, ACCA, ICAEW).
- They are registered members of the national professional body Institute of Certified Auditors Accountants of Greece (SOEL) but also of AAOB, Official Registers. Attain membership with the Economic Chamber of Greece (E.C.G.).

- The members certified auditors accountants perform an institutional profession recognised by the State, as specialist scientists in accounting and auditing provided for by an E.U. Directive and by Greek Law and are entitled to perform the statutory audit for the large entities as this is provided by EU Directive, incorporated into Greek law.
- Our members due to their outstanding experience made part of competent Committees, mainly of the economic Ministries and are also involved at all levels of other financial sectors of the State mechanism.
- Our members in their capacity as members of SOEL, or as a member of the Audit Firm, contributed to the following Committees and Working Groups, in respect of:
  - Greek General Chart of Accounts
  - Sectoral Charts of Accounts
  - National Accounting Council
  - Sectoral Charts of Accounts for Banks (with the E.C.G.)
  - As representatives of the Ministry of National Economy in the sessions of the E.E.C. Council, as experts for the implementation of the EC guidelines for Company Law Directives (e.g. 4<sup>th</sup>, 7<sup>th</sup>, 8<sup>th</sup>, 2006/43/EC, 2014/56/EU etc.).
  - Law Preparatory Committees of the Ministry of Economy and Finance for the adaptation of the Greek legislation to Community Law.
  - Committee for the reform of the Code of Books and Records (CBR) etc.
- Significant is also the scientific work of the members of our firm that has been realised through working groups and committees through various international organisations, such as:
  - International Accounting Standards Committee (IASC)
  - International Federation of Accountants (IFAC)
  - Federation of European Accountants (Accountancy Europe)
  - Fédération des Experts Comptables Méditerranéens (F.C.M.)

Lastly, significant is also the authorial work of the members and of the collaborators of our audit firm where professional auditors and experts in finance and accounting find solutions to their queries.

## II. Information about the firm

### A. Legal Form and Full Data of Actual Shareholders, Partners or Ownership

#### 1. Legal form and Head office

As mentioned above, the “ASSOCIATED CERTIFIED PUBLIC ACCOUNTANTS s.a.” Audit Firm with the distinctive name “Crowe” was established on 29 April 1993, from the overwhelming majority of the members of the Soma Orkoton Logiston (Body of Certified Public Accountants) “SOL”.

It operates in the form of a Public Company (S.A.) in accordance with the L. 4548/2018, which superseded the cod. L. 2190/1920. It is registered in the Department of Public Companies (S.A.), Regional Division of Central Athens of the Attica Directorate of Development with Company Registration Number 28936/01/B/93/239 as well as in the General Electronic Commercial Registry (G.E.MI.) with number 001216601000 and in the Athens Chamber of Commerce and Industry with Registration Number 120233 and the Hellenic Federation of Enterprises with Registration Number 44011. Our Audit Firm has its head office in the city of Athens. Its human resources at 31.12.2019 amounted to 603 persons, out of which 534 auditors.

#### 2. Actual shareholders partners or ownership

At the date of this report (**27/4/2020**) the registered shares of the firm are held by **263** certified public accountants, who have the right to sign on behalf of the audit firm. Our firm provides the possibility, to each one of its members that obtained the professional qualification of certified auditor accountant and is registered in the appropriate registry, to acquire, under certain conditions, the qualification of its shareholder. All the shareholders of our firm hold the same number of shares and in alphabetical order are as follows:

S/N	Institute of CPA (SOEL) Reg. No.	AAOB Reg. No.	SURNAME	NAME	FATHER'S NAME
1	15371	1108	ADRAKTAS	IOANNIS	ARISTEIDIS
2	49351	2328	ALAMANOS	ANDREAS	ARISTOTELIS
3	38101	2105	ALAMANOS	PANAGIOTIS	CHARILAOS
4	10071	1112	ALAMANOS	CHARILAOS	PANAGIOTIS
5	15391	1114	ALEVIZOS	PANAGIOTIS	DIMITRIOS

S/N	Institute of CPA (SOEL) Reg. No.	AAOB Reg. No.	SURNAME	NAME	FATHER'S NAME
6	15421	1118	ALEVRAS	DIONYSIOS	NIKOLAOS
7	15411	1116	ALEXANDROPOULOU	EFTHYMIA	NIKOLAOS
8	29031	2263	ALIMPERTIS	NIKITAS	EMMANOUIL
9	29041	1120	AMOUNTZA	ELEFTHERIA	EVANGELOS
10	31311	1121	AMPATZI	PELAGIA	ANASTASIOS
11	12771	1124	ANAGNOSTOPOULOS	ARGYRIOS	EFTHYMIOS
12	26881	2108	ANDREOU	KONSTANTINOS	ANASTASIOS
13	22211	1137	ANDROUTSOS	KONSTANTINOS	ANTONIOS
14	15331	1101	ANGELIDI	EVA	EVANGELOS
15	35481	2101	ANGELIS	GEORGIOS	ILIAS
16	15341	1104	ANGELOPOULOS	ANGELOS	ATHANASIOS
17	23721	1105	ANGELOU	PANAGIOTIS	DIMITRIOS
18	27811	1140	ANTONAKIS	THEODOROS	SPYRIDON
19	34341	2109	ANTONIOU	EVANGELIA	ANDREAS
20	29071	1143	ANTONOPULOU	ANDRONIKI	VASILEIOS
21	34351	2113	ARAMPATZIS	KONSTANTINOS	ATHANASIOS
22	27821	1148	ARGYRAKI	ANNA	GEORGIOS
23	15521	1150	ARKOUDAS	MICHAIL	KONSTANTINOS
24	16451	1542	BANILAS	EFSTATHIOS	PANAGIOTIS
25	29701	2189	BARLAS	PANAGIOTIS	ILIAS
26	21221	1549	BEKIARIS	ATHANASIOS	GEORGIOS
27	53311	2516	BINERIS	CHARALAMPOS	DIMITRIOS
28	26441	1552	BIZOURGIANNIS	EVANGELOS	GEORGIOS
29	33271	2193	BOUGDANOU	MARIANNA	ZACHARIAS
30	22371	1562	BOULMETI	EIRINI	IOANNIS
31	16501	1567	BOUTA	ALEXANDRA	KONSTANTINOS
32	24331	1869	CHAIKALIS	IOANNIS	VASILEIOS
33	15121	1870	CHAIRETIS	TILEMACHOS	NIKOLAOS
34	24341	1873	CHALEPA	DESPONA	KONSTANTINOS
35	15131	1874	CHANAS	KONSTANTINOS	NIKOLAOS
36	30651	1876	CHARALAMPOUS	DIMITRIOS	GEORGIOS
37	15151	1880	CHARITOS	PANTELIS	THEODOROS
38	15161	1881	CHARITOU	MARIA	NIKOLAOS
39	38811	2248	CHATZIKRYSTALLIS	DIMITRIOS	ANASTASIOS
40	15221	1888	CHATZILAKOS	VASILEIOS	SPYRIDON
41	26581	1891	CHATZISTAVRAKIS	MICHAIL	ELEFTHERIOS
42	25311	1892	CHATZITZANOU	KONSTANTINA	EVANGELOS
43	15241	1895	CHIRAS	CHRISTOS	GEORGIOS
44	44121	2434	CHRONOPOULOU	ELENI	KONSTANTINOS
45	33511	2251	CHRONOPOULOU	IOKASTI	THEODOROS
46	27021	2135	DALLAS	ANASTASIOS	FOTIOS
47	26231	1232	DAVILLAS	KONSTANTINOS	ANDREAS
48	10461	1241	DELIFOTIS	OMIROS	DIMOS
49	36911	2391	DELIS	GEORGIOS	DIMITRIOS
50	22271	2138	DENDIA	MARIA	EPPIKOS
51	13091	1250	DIAMANTIS	ATHANASIOS	STEFANOS
52	25021	1251	DIAMANTOPOULOS	ANDREAS	GEORGIOS
53	10481	1244	DILARIS	THEODOROS	GEORGIOS
54	39101	2352	DIONYSOPOULOS	ANGELOS	KONSTANTINOS
55	13111	1256	DOUMOULIAKAS	KONSTANTINOS	LEONIDAS

S/N	Institute of CPA (SOEL) Reg. No.	AAOB Reg. No.	SURNAME	NAME	FATHER'S NAME
56	33001	2140	DRAINAS	DIMITRIOS	STYLIANOS
57	40061	2364	DRAKOPOULOS	DIMITRIOS	SPYRIDON
58	10561	1259	DRAKOS	DIMITRIOS	KONSTANTINOS
59	22111	1272	EFTHYMIADI	SOFIA	MICAHIL
60	13151	1270	EVANGELINOS	KONSTANTINOS	PANAGIOTIS
61	22431	1854	FERTAKI	CHARIKLEIA	GEORGIOS
62	17201	1856	FILIPPOU	IOANNIS	THOMAS
63	15061	1861	FLOROU	IOANNA	DIMITRIOS
64	31271	1864	FRANTZANAS	SOTIRIOS	STEFANOS
65	15101	1865	FRATZESKOS	MARKOS	GRIGORIOS
66	17231	1866	FRIMAS	PANTELIS	PANAGIOTIS
67	15661	1194	GATSIOU	IFIGENEIA	GEORGIOS
68	36861	2389	GIANNAKOPOULOS	GEORGIOS	NIKOLAOS
69	36881	2129	GIANNOPOULOU	KONSTANTINA	GEORGIOS
70	15721	1206	GIANNOUTSOS	VASILEIOS	DIMITRIOS
71	27901	1210	GIOGOS	DIMITRIOS	MICHAEL
72	34471	2271	GKINI	ANNA	KONSTANTINOS
73	24051	1218	GKIPALIS	EPAMEINONDAS	NIKOLAOS
74	13041	1221	GKOGKOU	IOANNA	KONSTANTINOS
75	15751	1226	GKYZI	MARIA	NIKIFOROS
76	54691	2579	GLEZOS	LOGOTHETIS	IOANNIS
77	27001	2133	GOULIAS	STAVROS	DIMITRIOS
78	10401	1227	GOUZOUASIS	ANDREAS	IOANNIS
79	13071	1229	GRATSIA-DROMPAKI	ANGELIKI	KONSTANTINOS
80	15761	1231	GRIGORIADIS	CHRISTAKIS	KYPROS
81	53101	2445	ISAAKIDI	KONSTANTINA	ATHANASIOS
82	13291	1320	KAKOURAS	DIMITRIOS	EFSTATHIOS
83	36951	2149	KALINTERIS	ILIAS	THEOFANIS
84	15901	1322	KALLES	NIKOLAOS	CHRISTOS
85	30361	1330	KAMPOUTAS	NIKOLAOS	ARISTEIDIS
86	24111	1343	KARAGKOUNI	ELENI	VASILEIOS
87	40311	2398	KARALIS	EFSTATHIOS	IOANNIS
88	15931	1348	KARAMICHALIS	GEORGIOS	ANDREAS
89	31421	2157	KARAPOSTOLAKIS	IOANNIS	KONSTANTINOS
90	47831	2451	KARATHANOS	ATHANASIOS	KONSTANTINOS
91	29401	1366	KATSIDIS	NIKOLAOS	DIMITRIOS
92	33101	2162	KATSIMICHA	ATHINA	ANGELIS
93	13441	1367	KATSINELIS	IOANNIS	KONSTANTINOS
94	29421	1370	KERAMITZI	ATHINA	EPAMEINONDAS
95	35591	2165	KOLLYRIS	NIKOLAOS	EFTHYMIOS
96	16071	1395	KOROVESIS	PANAGIOTIS	IOANNIS
97	13561	1398	KOSMATOS	EVANGELOS	DIONYSIOS
98	13691	1449	KOSTARELIS	IOANNIS	ATHANASIOS
99	29481	1402	KOTSIKAS	GEORGIOS	EVANGELOS
100	35411	2283	KOTSIOPULOU	MARIA	APOSTOLOS
101	24151	1399	KOTZAMANIS	MICHAEL	ELEFHERIOS
102	27181	1423	KOUFOPOULOU	MARIA	EMMANOUIL
103	13631	1425	KOUFOS	KONSTANTINOS	SPYRIDON
104	16121	1409	KOURKOUTA	GEORGIA	IOANNIS
105	13591	1413	KOUSINOVALIS	DIMITRIOS	CHRISTOS

S/N	Institute of CPA (SOEL) Reg. No.	AAOB Reg. No.	SURNAME	NAME	FATHER'S NAME
106	16141	1418	KOUTRIS	GEORGIOS	KONSTANTINOS
107	39261	2502	KOUTSOULENTIS	VASILEIOS	THEODOROS
108	45291	2407	KOUTSOURLIS	PASHALIS	ANTONIOS
109	13641	1427	KROKOS	IOANNIS	ANTONIOS
110	33151	2173	KYRIAKOPOULOS	ANDREAS	KYRIAKOS
111	13661	1432	KYRIAKOPOULOS	PANAGIOTIS	ILIAS
112	16181	1435	KYRMPIZAKIS	GEORGIOS	EMMANOUIL
113	13741	1459	LAMPRINOS	DIMITRIOS	VASILEIOS
114	33191	2176	LATIFI	ADAMANTIA	IOANNIS
115	16221	1456	LAZARIDIS	GEORGIOS	ARCHIMIDIS
116	13781	1469	LIOULIAS	GRIGORIOS	STAVROS
117	13821	1480	LOLOS	KONSTANTINOS	MARKOS
118	13791	1472	LOUKISA	RENGINA	SPYRIDON
119	31511	2284	LOUKREZIS	PANAGIOTIS	MICHAIL
120	11231	1474	LOUMIOTIS	VASILEIOS	IOANNIS
121	23581	1478	LYTRA	THEODOSIA	PRODROMOS
122	16311	1484	MAKRIS	SERAFEIM	DIMITRIOS
123	53211	2455	MAKRYPIDIS	KONSTANTINOS	VASILEIOS
124	13831	1487	MALAVAZOU	AIKATERINI	ATHANASIOS
125	13841	1490	MANDELOS	KONSTANTINOS	GEORGIOS
126	24191	1498	MANOLIKAS	MICHAIL	EMMANOUIL
127	13871	1497	MANOLIS	IOANNIS	EVANGELOS
128	27271	1494	MANOUSAKIS	EMMANOUIL	NIKOLAOS
129	13891	1504	MARKAKIS	SPYRIDON	GEORGIOS
130	29611	2288	MARKOPOULOU	DESPONA	PANAGIOTIS
131	16351	1509	MASAOUTIS	ATHANASIOS	ALEXANDROS
132	37841	2417	MAVRIKOS	ATHANASIOS	CHRYSOSTOMOS
133	25121	1512	MELAS	KONSTANTINOS	STYLIANOS
134	13911	1514	MENELAOU	CHRISTOS	APOSTOLOS
135	16381	1516	MERENTITI	VASILIKI	DIMOSTHENIS
136	29641	2184	MERKOURAKIS	DIMITRIOS	LAMPROS
137	16391	1517	METSIOS	ILIAS	ATHANASIOS
138	16421	1529	MOSCHOS	IOANNIS	DIMITRIOS
139	14071	1572	NAKOS	NIKOLAOS	SOTIRIOS
140	20961	1581	NIKOLOPOULOS	NIKOLAOS	ATHANASIOS
141	14141	1585	NIOTIS	KONSTANTINOS	CHARALAMPOS
142	34921	2712	NTAMPOS	PANTELEIMON	STAVROS
143	28211	2196	NTAVARINOU	KONSTANTINA	FOTIOS
144	47661	2553	PANAGIS	EFSTATHIOS	ANGELOS
145	37651	2203	PANTELIS	GEORGIOS	STAVROS
146	31631	1628	PAPADAKI	MARIANNA	PAVLOS
147	25191	1631	PAPADIMITRIOU	CHRISTOS	STEFANOS
148	28241	1635	PAPADOPoulos	PANAGIOTIS	KONSTANTINOS
149	16611	1636	PAPADOPoulos	IOANNIS	NIKITAS
150	26471	1639	PAPADOPoulou	EIRINI	IOANNIS
151	37221	2296	PAPAGEORGAKOPOULOS	DIONYSIOS	VASILEIOS
152	48261	2554	PAPAGEORGOPoulos	GEORGIOS	NIKOLAOS
153	14251	1625	PAPAGIANNIS	ANTONIOS	CHRISTOS
154	16581	1626	PAPAGIANNOPoulos	IOANNIS	EVANGELOS
155	26461	2298	PAPAGIANNOS	THEODOROS	IOANNIS

S/N	Institute of CPA (SOEL) Reg. No.	AAOB Reg. No.	SURNAME	NAME	FATHER'S NAME
156	14301	1649	PAPAKANDERAKIS	STAVROS	EMMANOUIL
157	29821	2299	PAPAKIS	NIKOLAOS	LAZAROS
158	16651	1652	PAPAKONSTANTINOU	PANAGIOTIS	KONSTANTINOS
159	47861	2376	PAPAKYRILLOU	GEORGIOS	EVANGELOS
160	14321	1655	PAPANIKOLAOU	THEODOROS	APOSTOLOS
161	14351	1659	PAPARIDIS	EFSTRATIOS	GEORGIOS
162	22731	2211	PAPPA	ELENI	CHARALAMPOS
163	25201	2212	PAPPAS	GRIGORIOS	EMMANOUIL
164	33331	2300	PAPPAS	MICHAIL	KONSTANTINOS
165	16701	1668	PAPPAS	STERGIOS	VASILEIOS
166	25221	1670	PARISI	EVANGELIA	CHRISTOS
167	11891	1675	PATATOUKAS	NEKTARIOS-EMMANOUIL	PANAGIOTIS
168	14421	1678	PATEROMICHELAKIS	VASILEIOS	EMMANOUIL
169	33351	2213	PATOUCHA	IOANNA	KONSTANTINOS
170	21151	1679	PATOUNAS	IOANNIS	KONSTANTINOS
171	33361	2215	PATSIDOU	ANASTASIA	PANAGIOTIS
172	41411	2430	PAVLIDOU	SOFIA	IOANNIS
173	14451	1686	PEPPAS	EPAMEINONDAS	ANASTASIOS
174	14461	1689	PETEINOS	EVANGELOS	IOANNIS
175	16721	1691	PETRAKOPoulos	ALEXANDROS	VASILEIOS
176	49151	2466	PETROPOULOS	ARISTEIDIS	CHARALAMPOS
177	14471	1700	PITTA	CHRISTINA	KONSTANTINOS
178	14491	1706	POLYZOS	APOSTOLOS	THOMAS
179	39541	2341	POULIS	CHRISTOS	EVANGELOS-STAVROS
180	14501	1713	PREVENTIS	PANAGIOTIS	VASILEIOS
181	31671	1712	PREVEZANOU	STYLIANI	EVANGELOS
182	14521	1715	RALLIS	IOANNIS	PANAGIS
183	12091	1717	RIGAS	ANASTASIOS	IOANNIS
184	14531	1719	RIGOPOULOU	ELENI	PANAGIOTIS
185	14541	1720	RITAS	VASILEIOS	APOSTOLOS
186	22041	1721	RIZOULIS	VAIOS	ACHILLEAS
187	36541	2467	ROMANAKIS	EVANGELOS	IOANNIS
188	26511	1724	ROUSAS	APOSTOLOS	GEORGIOS
189	14561	1726	ROUSOU	RODOULA	PANAGIS
190	16801	1728	ROUSSOS	KONSTANTINOS	IOANNIS
191	25471	1743	SACHANIDOU	KALLINIKI	MICHAIL
192	14611	1738	SALOUSTROS	STAVROS	KONSTANTINOS
193	37321	2225	SAMIOTIS	ELEFTHERIOS	CHRISTOS
194	49211	2343	SAMOILIS	DIMITRIOS	MICHAIL
195	33391	2303	SAVADIS	IOANNIS	THEODOROS
196	33731	2227	SERLIDAKIS	KONSTANTINOS	MICHAIL
197	37381	2311	SFONTOURIS	PANAGIOTIS	ANASTASIOS
198	14861	1796	SFYRIS	ALEXANDROS	DIONYSIOS
199	14631	1744	SGOUROS	GEORGIOS	EMMANOUIL
200	12181	1748	SIASTATHIS	MELETIOS	DIMITRIOS
201	29931	2229	SIMATOS	CHRISTOS	GEORGIOS
202	26521	1752	SIOTROPOU	ALEXANDRA	EFSTATHIOS
203	23671	1753	SKALIOTOU	ELENI	PANAGIOTIS
204	14661	1754	SKAMPAVIRIAS	GEORGIOS	ATHANASIOS
205	14671	1757	SKONDROGIANNIS	DIMITRIOS	CHRISTOS

S/N	Institute of CPA (SOEL) Reg. No.	AAOB Reg. No.	SURNAME	NAME	FATHER'S NAME
206	22411	1758	SKORDALAKI	ELENI	LEONIDAS
207	16861	1759	SKOTIS	NOMIKOS	NIKOLAOS
208	14701	1765	SOFOU	ZOI	DIMITRIOS
209	14731	1769	SPINTHAKIS	KONSTANTINOS	EMMANOUIL
210	14771	1778	STAMATIOU	GEORGIOS	PARASKEVAS
211	26531	2308	STAMATOPOULOS	FANOURIOS	APOSTOLOS
212	37671	2234	STASINOPoulos	CHARILAOS	PANAGIOTIS
213	14791	1782	STAVROU	DIMITRIOS	CHRISTOS
214	35201	2310	STERGIOU	CHRISTOS	KONSTANTINOS
215	27541	1789	SYKAS	NIKOLAOS	ATHANASIOS
216	14831	1790	SYLEOUNIS	KONSTANTINOS	DIMITRIOS
217	29971	2236	SYRAGOPOULOS	MICHAIL	KONSTANTINOS
218	17001	1791	SYRIGOS	DIMITRIOS	IOANNIS
219	14881	1800	TAKIS	KONSTANTINOS	LAMPROS
220	33741	2312	TAXOS	VASILEIOS	ILIAS
221	13221	1300	THEODOROPOULOS	PANAGIOTIS	GEORGIOS
222	35251	2237	TIGKOU	NATALIA-STAVROULA	PETROS
223	14921	1817	TOKIS	EVANGELOS	KONSTANTINOS
224	33441	2238	TOLIAS	DIMITRIOS	ΛΑΜΠΡΟΣ
225	19081	1819	TOTONIS	CHRISTOS	IOANNIS
226	17081	1820	TRIANTAFYLLOPOULOU	IOANNA	KONSTANTINOS
227	17091	1822	TRIANTAFYLLOU	MILTIADIS	PANAGIOTIS
228	14931	1824	TRIANTOS	KONSTANTINOS	EVANGELOS
229	14941	1825	TRIMPONIAS	PANAGIOTIS	VASILEIOS
230	30631	1827	TSANGALIS	ATHANASIOS	APOSTOLOS
231	37681	2240	TSARAMANIDIS	GRIGORIOS	GEORGIOS
232	39761	2350	TSARTSIS	VIKENTIOS	PANELIS
233	17131	1837	TSELIKOU	ANNA	ARISTEIDIS
234	22771	2315	TSIAMOULOS	ATHANASIOS	KONSTANTINOS
235	14971	1838	TSIAVOS	MICHAIL	IOANNIS
236	17161	1843	TSIOLIS	GEORGIOS	KONSTANTINOS
237	23711	1842	TSIRONIS	NIKOLAOS	VASILEIOS
238	28411	2245	TSOTRAS	IOANNIS	ELEFTHERIOS
239	31731	1846	TSOUKAS	EMMANOUIL	KONSTANTINOS
240	49291	2678	TSOUTSOS	THEOCHARIS	GEORGIOS
241	29991	2432	TZAMAROU	PAGONA	EVANGELOS
242	14981	1812	TZIMPRAGOS	NIKOLAOS	GEORGIOS
243	12371	1814	TZIORTZIS	ALEXANDROS	EFTHYMIOS
244	14911	1815	TZORAS	FAIDON	ZOIS
245	17071	1816	TZORTZAKIS	EMMANOUIL	MICHAIL
246	15551	1155	VALASSAS	VERGIS	KONSTANTINOS
247	20671	1158	VANOPoulos	GEORGIOS-ΚΩΣΤΑΣ	DIMITRIOS
248	15601	1162	VARDANIS	PANARETOS	GEORGIOS
249	12851	1163	VARDARAMATOS	SOTIRIOS	GERASIMOS
250	27871	1169	VASILEIOU	PANAGIOTA	NIKOLAOS
251	21301	1172	VASSIS	ATHANASIOS	IOANNIS

S/N	Institute of CPA (SOEL) Reg. No.	AAOB Reg. No.	SURNAME	NAME	FATHER'S NAME
252	12881	1175	VELENTZAS	CHRISTOS	PANAGIOTIS
253	26151	1185	VLETSAS	PANAGIOTA	NAPOLEON
254	11541	1592	XENAKIS	STYLIANOS	MICHAIL
255	29781	1596	XENOU	MARIANTHI	CHARALAMPOS
256	15831	1283	ZACHARIAS	NIKOLAOS	GEORGIOS
257	24071	1275	ZAVALIANI	ILIADA	AVGERINOS
258	13161	1276	ZAVITSAS	IOANNIS	ANTONIOS
259	34541	2144	ZERVA	FOTEINI	GRIGORIOS
260	13201	1290	ZIAKAS	IOANNIS	DIMITRIOS
261	15851	1292	ZIGKERIDIS	DIMITRIOS	GEORGIOS
262	15841	1289	ZIROU	ANASTASIA	ATHANASIOS
263	15861	1294	ZYGELOPOULOS	DIMITRIOS	ACHILLEAS

### 3. Data of the certified public accountants that are not shareholders

Our **67 members-certified public accountants**, which are authorised to sign on behalf of the firm only upon approval of the Board of Directors but are not shareholders, alphabetically are as follows:

S/N	Institute of CPA (SOEL) Reg. No.	AAOB Reg. No.	SURNAME	NAME	FATHER'S NAME
1	47921	2805	ANDREADAKIS	EFSTRATIOS	NIKOLAOS
2	29061	2623	ANDROULAKIS	GEORGIOS	NIKOLAOS
3	36801	2622	ANTONIOU	EVANGELOS	IOANNIS
4	32911	2268	ASVESTI	AIKATERINI	VISSARION
5	49021	2832	BARAKOS	GEORGIOS	CHRISTOS
6	42461	2833	BATSALAS	ANASTASIOS	GEORGIOS
7	31591	2515	BIMPOU	MARIA	STEFANOS
8	33771	2681	CHALVATZI	STAVROULA	NIKOLAOS
9	61251	2857	CHAMPILOU	MARIA	DAMIANOS
10	37461	2593	CHARIKIOPoulos	GEORGIOS	PETROS
11	58261	2613	CHATZIIGNATIou	MARIOS	TRYFONAS
12	27951	2692	DAKOURA	ASPASIA	NIKOLAOS
13	50481	2568	DALEZIOU	VASILIKI	IOANNIS
14	51171	2596	DIAMANTIS	STEFANOS	ATHANASIOS
15	56901	2693	DIMOPOULOS	GEORGIOS	PARASKEVAS
16	56941	2647	EFTHYMIOPoulos	PARASKEVI	EFSTATHIOS
17	55301	2953	FARMAKIS	THOMAS	ALEXANDROS
18	30081	2573	FASKIOTIS	GEORGIOS	MARINOS
19	54501	2564	FASOULAS	MARIOS	VASILEIOS
20	41451	2680	FOTI	OLGA	DIMOS
21	59421	2731	GEORGIADIS	DIMITRIOS	NIKOLAOS
22	50451	2540	GERARIS	VASILEIOS	GEORGIOS
23	56811	2866	GIALAMPRINOU	GEORGIA	NIKOLAOS
24	34461	2917	GKAVELI	VASILIKI	GEORGIOS

S/N	Institute of CPA (SOEL) Reg. No.	AAOB Reg. No.	SURNAME	NAME	FATHER'S NAME
25	26211	2690	GKINTIDOU	GEORGIA	CHRISTODOULOS
26	48831	2544	KALANTZI	NIKOLETTA	KONSTANTINOS
27	57031	2651	KALANTZIS	PANAGIOTIS	PETROS
28	34611	2615	KALLIORA	EVDOXIA	VASILEIOS
29	45271	2595	KALOGIROU	SOFIA	KONSTANTINOS
30	48841	2449	KAMARAS	ALEXANDROS	IOANNIS
31	34631	2151	KAMPALOURI	DIMITRA	MICHAIL
32	21711	2773	KARANIKAS	PANAGIOTIS	NIKOLAOS
33	36981	2548	KARAPANOS	IOANNIS	THEODOROS
34	31431	2775	KARATZAS	GEORGIOS	SOTIRIOS
35	27121	2928	KAROUZAKIS	EMMANOUIL	NIKOLAOS
36	25091	2503	KONSTA	REVEKKA	ANASTASIOS
37	24181	2590	KONSTAS	ALEXANDROS	EPAMEINONDAS
38	50601	2404	KOURTIS	SOTIRIOS	DIMITRIOS
39	50611	2701	KOUTOULAS	ILIAS	GEORGIOS
40	34771	2660	MAKRAKIS	ILIAS	ELEFOTHERIOS
41	52091	2739	MANIATIS	ANTONIOS	CHRISTOS
42	50681	2581	MARKOS	CHRISTOS	KONSTANTINOS
43	57391	2783	MARKOULATOU	DANAI - DIMITRA	PANAGIOTIS
44	51071	2513	MOUNDROS	GEORGIOS	SIMON
45	51741	2666	OIKONOMOU	VAIA	CHRYSANTHOS
46	27371	2789	PAPADIOCHOS	ANDREAS	GEORGIOS
47	50761	2555	PAPADOPOLOU	EIRINI	IOANNIS
48	57811	2790	PAPAKOSTA	EIRINI	GEORGIOS
49	52321	2597	PATEROMICHELAKI	AIKATERINI	VASILEIOS
50	54321	2580	RIZOPOULOS	ALEXANDROS	ATHANASIOS
51	66571	2847	SALPIGKIDOU	GEORGIA	ANDREAS
52	27481	2560	SAMOLIS	MARIOS	VASILEIOS
53	52811	2794	SDRALIA	PANAGIOTA - EIRINI	VASILEIOS
54	59191	2848	SGOURAKIS	GEORGIOS	EMMANOUIL
55	45011	2720	SIKALIA	KRINOULA	GEORGIOS
56	45051	2901	SPYRIDAKI	DIMITRA	CHRISTOS
57	58041	2902	STAMATI	KALLIOPI	GRIGORIOS
58	48401	2723	STEFANOU	DIMITRA	GEORGIOS
59	53521	2724	TASSOS	PANAGIOTIS	CHRISTOS
60	52831	2755	TOLIDIS	NIKOLAOS	IOANNIS
61	27611	2855	TSICHLIS	DIMITRIOS	PANAGIOTIS
62	59521	2905	TSITSANoudis	ATHANASIOS	DIMOSTHENIS
63	42261	2754	TZORTZIS	EFTHYMIOS	PANAGIOTIS
64	45461	2440	VARDARAMATOS	IAKOVOS	SOTIRIOS
65	59071	2665	XENAKIS	MICHAIL	STYLIANOS
66	24081	1286	ZERVAS	ANTONIOS	KONSTANTINOS
67	45631	2817	ZIAKA	ELEFOTHERIA	VASILEIOS

## 4. Offices in Greece

Our firm has the following offices:

### **ATHENS - HEAD OFFICE**

3, FOK. NEGRI STR., 112 57 ATHENS  
TEL: +30 210 8691100  
FAX: +30 210 8617328, 210 8618016  
e-mail: [info@crowe.gr](mailto:info@crowe.gr)  
site: [www.crowe.gr](http://www.crowe.gr)

### **THESSALONIKI**

BALKAN CENTER (ALEXANDROS BUILDING)  
31, GIANNITSON & PATRIARCHOU KYRILLOU STR.  
546 27 THESSALONIKI  
TEL: +30 2310 544150/1  
FAX: +30 2310 544152

### **CORFU**

7, DIMOKRATIAS AVE., 491 00 CORFU  
TEL: +30 2661 042037  
FAX: +30 2661 082087

### **PATRA**

44, AMERIKIS STR., 264 41 PATRA  
TEL: +30 2610 431938  
FAX: +30 2610 436867

### **LARISSA**

34, KOUMA STR., 412 23 LARISSA  
TEL: +30 2410 555461/2  
FAX: +30 2410 555463

### **HERAKLION - CRETE**

209-211, 62 MARTYRON AVE., 713 04 HERAKLION  
TEL: +30 2810 280104  
FAX: +30 2810 280686

### **IOANNINA**

1, SALAMAGKA STR., 453 32 IOANNINA  
TEL: +30 2651 070293, 2651 070876  
FAX: +30 2651 070351

### **KAVALA**

8B, MITROPOLEOS STR., (5<sup>th</sup> Floor), 654 03 KAVALA  
TEL: +30 2510 223959  
FAX: +30 2510 223959

## 5. Related companies having registered office in Greece

Related with the “ASSOCIATED CERTIFIED PUBLIC ACCOUNTANTS s.a.” is the company “SOL Consulting S.A.” which operates in the provision of consulting, financial and HTL services. It has an autonomous operational structure that is not functionally linked to the Audit Firm. It has its own executives, consultants and staff that are not involved with those of the Audit Firm. Our firm uses the services of the specialized consultants of “SOL Consulting S.A.” as expert services in any audits of financial statements deemed necessary according to IFAC’s ISA. “SOL Consulting S.A.” operates within the overall frame of the network business alliance.

## 6. Registration in public registers of recognised certified auditors in Greece and abroad

The audit firm in accordance with articles 14-20 of L. 4449/2017, is registered with number 125 in the special register, which is kept by the Institute of Certified Public Accountants of Greece (SOEL) and with number 020 in the special register of AAOB.

## 7. Main Activities

### ■ AUDITS OF FINANCIAL STATEMENTS

- Public companies, LTD, Private Capital Companies (IKE) and other companies
- Banks
- Insurance companies
- Investment - Portfolio companies
- Mutual Funds Management companies
- Leasing companies
- Securities - Brokerage Firms (Investment Services S.A., Investment Intermediation Firms S.A. - AEED)
- Legal Persons of the Public Sector and Public Corporations
- Municipalities, Municipal Enterprises and Regions
- Hospitals and Health Care Units
- Social Security Funds
- Agricultural and other Cooperatives and Cooperative Associations
- Consolidated financial statements

### ■ SPECIAL AUDITS

- Other Accounts – Financial Statements
- Special Accounts for Research projects
- Reliability of systems of internal control, etc.
- Special Accounts of Universities, Technological Education Institutes (TEI), Research Centres of Educational Institutes
- Investment projects
- Tax Audit (under article 65A of L. 4174/2013 as in force) of any audited entity for the issue of tax audit certificate/tax compliance report optionally.

**■ ORGANISATION**

- Accounting Departments and Electronic Data Processing systems
- Corporate Governance Systems and Internal Control Systems
- Costing-Stocks and other special departments and services
- Development and Application of Accounting Plans
- Application of International Accounting Standards
- Application of Greek Accounting Standards

**■ SPECIAL SERVICES FOR**

- Assessments - Valuations of enterprises
- Mergers & Acquisitions - conversions - liquidations
- Share Capital change (increase - decrease)
- Admission reports in listed companies
- Corporate governance statements
- Accounting expert's report, Certificates of survey
- Expert's opinion on auditing, accounting and tax matters

**■ PROFESSIONAL TRAINING OF BUSINESS EXECUTIVES IN**

- Accounting Standardization
- Greek Accounting Standards, General and Sectoral Accounting Standards
- International Accounting Standards
- Internal Control Systems
- Principles of corporate governance
- Principles and Standards for independent audit
- Application of tax and other legal regulations by means of accounting and auditing.
- Information-training of audit committees
- Information-Training of new auditors

## • B. Detailed Description of Legal and Structural Relationship of the network where “ASSOCIATED CERTIFIED PUBLIC ACCOUNTANTS s.a.” is a Member Firm

Our firm is full member of Crowe Global, leading international network of independent audit, tax and advisory firms.

### 1. About Crowe Global

Crowe Global's core purpose is to develop and support a global network of highly regarded independent member firms working together to satisfy the audit, tax and advisory needs of national and multinational organizations. To achieve this core purpose, the member firms of Crowe Global are committed to deliver high quality audit, tax and advisory services to clients.

Crowe Global is one of the 10 largest international networks of independent accounting and advisory services firms. The members of Crowe Global had total revenue in 2018 of US \$ 4.300 million out of which US \$ 2.000 million derive from audit engagements.

Crowe Global operates in 130 countries through over 200 independent accounting and advisory firms (has an immense global presence, allowing it to consistently perform high-quality audits, worldwide).

The member firms have a total of over 42.000 specialised professional and administrative staff.

### 2. Legal and constitutional Structure of Crowe Global

Crowe Global is an international network of independently owned and managed accounting and advisory firms that may be licensed to use the “Crowe” brand in connection with the provision of accounting, auditing, tax, advisory and other professional services to their clients.

Crowe Global is commercially organized under the laws of Switzerland as a “Verein” (Association) and is a non-practicing entity, and does not provide professional services in its own right. Crowe Global is owned by its member firms. Crowe Global operates through a wholly owned subsidiary incorporated under the laws of the State of New York in the United States of America where it is headquartered.

Crowe Global is considered a “network” as defined under the Code of Ethics of the International Federation of Accountants (“IFAC”) and by virtue of its membership of the IFAC Forum of Firms.

### 3. Governance and management of Crowe Global

Crowe Global is governed by its Board of Directors. The Board of Directors (“Board”) is charged with overseeing the activities of the network, including setting strategy and policy. The Board is made up of individuals representing member firms of Crowe Global and the Chief Executive Officer.

The Chief Executive Officer heads the Management Committee, which is responsible to carry out the strategic plans and policies as established by the Board. The Management Committee oversees the daily management of the network’s operations.

### 4. Forum of Firms

Crowe Global is a member of the Forum of Firms of the IFAC. Members of the Forum are required to implement and monitor quality control standards that the Forum has prepared. Crowe Global prepares an annual declaration that members adhere to the Forum’s standards.

### 5. Membership standards

Having the right firms in the right markets is a critical success factor in achieving the vision of Crowe Global. This would implicitly mean that firms should commit resources and deliver timely and quality service to international and local businesses.

### 6. Conduct of professional services

The member firms of Crowe Global are expected to adhere to the highest standards of quality while carrying out their professional services.

It is expected that members will instil in their firms a culture focused on behaving in a professional manner and observing national and international standards on ethics. Member firms are expected to monitor compliance with their national ethics standards to identify potential areas of conflict and resolve them.

Our firms are strongly encouraged to comply with the ethics and professional standards that are promulgated by the International Federation of Accountants (“IFAC”); particularly on transnational cross-border assurance engagements. While conducting or handling transnational engagements IFAC standards would be considered the minimum set of standards to follow, taking into account the application of the standards by law, regulation and national standards in an individual member’s jurisdiction.

It is expected that our member firms providing assurance services will comply with IFAC’s International Standards on Quality Control (“ISQC 1”), or its national equivalents, and that they will

come up with a system of quality control that is designed and aimed to provide reasonable assurance that the firm and its personnel comply with professional standards and regulatory and legal requirements; and that ensures that reports issued by the firm are appropriate under the circumstances.

## 7. Crowe Global audit Methodology

Crowe Global's audit methodology complies with the International Standards on Auditing issued by the International Audit & Assurance Standards Board. Members of Crowe Global are expected to apply this methodology on all international audit engagements.

## 8. Crowe Global Independence Standards

Member firms of Crowe Global:

- have policies and methodologies that allow them to perform audit services in conformity with applicable national ethics and independence standards
- have policies and methodologies for the conduct of transnational audit engagements that conform, to the extent practicable and applicable, and subject to national interpretation and application, to the International Ethics Standards Board for Accountants Code of Ethics for Professional Accountants ("the Code"), as well as applicable national codes of ethics.
- are independent of the audited customers of the other member firms.

Crowe Global has applied procedures to support member firms in complying with the international Code's independence provisions.

## 9. Professional Education and Information Sharing

Crowe Global promotes a global programme of professional education for member firms. This programme covers training and support in International Financial Reporting Standards, International Standards on Auditing and the International Code of Ethics. Programme activity includes seminars for audit partners, specialist staff training courses and a webinar programme.

In addition, members have access to professional support materials including manuals and guides to assist them with the application of global professional standards.

## 10. Crowe Global Audit Practice Review

Rigorous review procedures are required to ensure that practice and quality standards are adhered to. All member firms receive periodic reviews of their audit practice. Reviews are performed using an approach that reflects global best practices. In reviews is also monitored the implementation of international quality control standards and the performance of audit assignments.

Regarding the audit practice reviews carried out at our firm by Crowe Global in 2015 and early 2019 we refer to pages 57 and 58 of the present.

Here below follows a list of Crowe Global member firms providing audit services and the countries in which they operate:

### **CROWE GLOBAL**

#### **MEMBER FIRMS WHICH PROVIDE AUDIT SERVICES**

<b>Country</b>	<b>Region</b>	<b>Firm</b>
Afghanistan	Asia Pacific	Crowe Horwath - Afghanistan
Albania	EMEA	Crowe AL SHPK
Algeria	EMEA	Cabinet D'Audit Hamza et Associes
Andorra	EMEA	Alfa Capital Assessors I Auditors SL
Angola	EMEA	Crowe Angola - Auditores e Consultores, S.A.
Argentina	Americas	Canepa, Kopec y Asociados
Australia	Asia Pacific	Crowe Horwath (Australasia) Pty. Ltd.
Austria	EMEA	Crowe SOT
Azerbaijan	EMEA	Crowe Baltic Caspian Audit LLC
Azerbaijan	EMEA	ABAK-Az Crowe Ltd.
Bahamas	Americas	Crowe Bahamas
Bahrain	EMEA	Crowe BH
Bangladesh	Asia Pacific	Ahmed Mashuque and Co.
Barbados	Americas	Crowe BDS SRL
Belgium	EMEA	Callens, Pirenne & Co.
Brazil	Americas	Crowe Consult Consultoria Empresarial
Brazil	Americas	Crowe Macro Auditoria e Consutoria Ltda.
Brazil	Americas	Crowe Consult Auditores Independentes
British Virgin Islands	Americas	Crowe (BVI) Limited
Bulgaria	EMEA	Crowe Bulgaria Audit EOOD
Cameroon	EMEA	Okalla Ahanda & Associes
Canada	Americas	Crowe BGK LLP
Canada	Americas	Crowe MacKay LLP
Canada	Americas	Crowe Soberman LLP
Cayman Island	Americas	Crowe Horwath Cayman Limited
Chile	Americas	Crowe Auditores Consultores Ltda.
China	Asia Pacific	Ruihua Certified Public Accountants
Colombia	Americas	Crowe Co S.A.S.
Costa Rica	Americas	Crowe Horwath CR, S.A.
Cote d'Ivoire	EMEA	Uniconseil

Country	Region	Firm
Croatia	EMEA	Crowe Hrvatska
Curacao	Americas	ACC & Partners B.V.
Cyprus	EMEA	Crowe Cyprus Limited
Czech Republic	EMEA	Crowe Advartis
Denmark	EMEA	Crowe Statsautoriseret Revisionsinteressentskab
Dominican Republic	Americas	Sotero Peralta & Asociados
Ecuador	Americas	Romero y Asociados Cia. Ltda.
Egypt	EMEA	Crowe Dr A.M. Hegazy & Co
El Salvador	Americas	Integrity Auditing Group, Ltda. de C.V.
Estonia	EMEA	CDNW Group Ltd
Finland	EMEA	DHS Oy Audit Partners
France	EMEA	Avvens Management
France	EMEA	Becouze & Associes
France	EMEA	Cifralex
France	EMEA	Cogefis Associes
France	EMEA	Crowe Reunion
France	EMEA	Dauge Fideliance
France	EMEA	Dupouy & Associes
France	EMEA	Fideliance
France	EMEA	Fiduroc
France	EMEA	Groupe Ficorec
France	EMEA	Crowe HAF
France	EMEA	RSA
France	EMEA	SAS Groupe Rocard
France	EMEA	Sogec
French Polynesia	Asia Pacific	Horwat Tahiti
Georgia	EMEA	Crowe GE LLC
Germany	EMEA	Dr. Kleeberg and Partners GmbH
Germany	EMEA	Möhrle Happ Luther Wirtschaftsprüfungsgesellschaft mbH
Germany	EMEA	HAS Horwath
Germany	EMEA	RWT Crowe GmbH Wirtschaftsprüfungsgesellschaft Steuerberatungsgesellschaft
Ghana	EMEA	Veritas Associates
Greece	EMEA	Crowe SOL
Guatemala	Americas	Vertice Financiero S.A.
Honduras	Americas	Horwath Central America, S. de R.L. de C.V.
Hong Kong	Asia Pacific	Crowe (HK) CPA Ltd.
Hungary	EMEA	Crowe FST Consulting Kft
India	Asia Pacific	V.P. Thacker & Co
Indonesia	Asia Pacific	Kosasih Nurdiyaman Mulyadi Tjahjo & Rekan
Ireland	EMEA	Crowe Ireland
Isle of Man		Crowe Isle of Man LLC
Israel	EMEA	Ovadia Pick Kriheli And Co.
Italy	EMEA	Crowe AS SpA
Japan	Asia Pacific	Crowe Toyo & Co.
Jordan	EMEA	Ibrahim Yaseen & Partners Co. – Professional Auditors
Jordan	EMEA	Al-Tillawi, Al-Khateeb Company & Partner Co.
Kazakhstan	EMEA	Crowe Kazakhstan
Kenya	EMEA	Crowe Erastus & Co.
Kuwait	EMEA	Cowe Al Muhanna & Co.

Country	Region	Firm
Latvia	EMEA	Crowe DNW SIA
Lebanon	EMEA	Crowe Professional Auditors LV
Liberia	EMEA	Crowe Liberia LLC
Liechtenstein	EMEA	Crowe Treuhand AG
Lithuania	EMEA	UAB Crowe LT
Luxembourg	EMEA	C-CLERC S.A.
Malawi	EMEA	Crowe J&W
Malaysia	Asia Pacific	Crowe Malaysia
Maldives	Asia Pacific	Crowe Maldives LLP
Mali	EMEA	Inter Africaine d'Audit et d'Expertise (IAE-SARL)
Malta	EMEA	Horwath Malta
Mauritius	EMEA	Crowe Horwath ATA
Mexico	Americas	Gossler SC
Morocco	EMEA	Horwath Maroc Audit
Nepal	Asia Pacific	B. K. Agrawal & Co.
Netherlands	EMEA	Crowe Foederer B.V.
Netherlands	EMEA	Crowe Peak B.V.
New Zealand	Asia Pacific	Crowe Australasia
Nigeria	EMEA	Crowe DaFinone
Norway	EMEA	Vidi Revision AS
Oman	EMEA	Crowe Mak Ghazali LLC
Pakistan	Asia Pacific	Crowe Hussain Chaudhury And Co.
Panama	Americas	Moreno And Moreno CPA
Paraguay	Americas	J.C. Descalzo & Asociados
Peru	Americas	Roncal, D'Angelo y Asociados S. Civil De R.L.
Philippines	Asia Pacific	Ramon F. Garcia & Company CPAs
Poland	EMEA	Atwick Sp Z.o.o.
Portugal	EMEA	Horwath & Associados, SROC, Lda.
Puerto Rico	Americas	Crowe PR PSC
Qatar	EMEA	Adib Al Chaa & Co Chartered Accountants
Romania	EMEA	Boscolo & Partners Consulting
Russia	EMEA	Crowe Russaudit LLC
Russia	EMEA	Crowe Expertiza LLC
Russia	EMEA	ACC Crowe Audex LLC
Saudi Arabia	EMEA	Al-Azem & Al-Sudairy Certified Public Accountants
Senegal	EMEA	Max Consulting Group (MCG)
Serbia	EMEA	Crowe RS doo
Singapore	Asia Pacific	Crowe Horwath First Trust LLP
Slovakia	EMEA	Crowe Advartis
South Africa	EMEA	Crowe HZK
South Africa	EMEA	Crowe JHB
South Korea	Asia Pacific	Hanul LLC
Spain	EMEA	Crowe Auditores España S.L.P
Sri Lanka	Asia Pacific	Gajma and Co.
Suriname	Americas	Crowe Burgos Accountants N.V.
Sweden	EMEA	Sydrevisioner Vast AB
Sweden	EMEA	Kindberg Revision AB
Sweden	EMEA	Sydrevisioner Aktiebolag
Sweden	EMEA	Crowe Osborne AB
Sweden	EMEA	Crowe Västerås AB

Country	Region	Firm
Sweden	EMEA	Nyström & Partners Revision KB
Sweden	EMEA	Crowe Tonnerviks Revision AB
Sweden	EMEA	Tonnerviks Horwath Revision Skane AB
Switzerland	EMEA	Alfa Treuhand- und Revisions AG
Switzerland	EMEA	Curator And Horwath AG (Tax)
Taiwan	Asia Pacific	Crowe Horwath (TW) CPAs
Tajikistan	EMEA	Crowe ACG
Tanzania	EMEA	Crowe Tanzania
Thailand	Asia Pacific	ANS Audit Company Limited (to change to Crowe ANS)
Tunisia	EMEA	Cabinet Zahaf et Associes
Tunisia	EMEA	Horwath ACF
Turkey	EMEA	Kavram Bağımsız Denetim ve Danışmanlık A.Ş.
Turkey	EMEA	Crowe Horwath Olgu Bagimsiz Denetim ve YMM A.S.
Turkey	EMEA	Mert 1 YMM ve Bagimsiz Denetim A.S.
Turkey	EMEA	Crowe HSY AB
Uganda	EMEA	Crowe AIA
Ukraine	EMEA	Inter-Audit Crowe LLC
Ukraine	EMEA	AC Crowe Ukraine
Ukraine	EMEA	Crowe Audit & Accounting Ukraine LLC
United Arab Emirates	EMEA	Crowe Mak
United Kingdom	EMEA	Crowe UK LLP
United States	Americas	Crowe LLP
United States	Americas	TRUSTA, An Accountancy Corporation
Uruguay	Americas	Stavros Moyal y Asociados SRL
Uzbekistan	EMEA	Crowe TAC
Venezuela	Americas	SC Marquez Perdomo & Asociados
Vietnam	Asia Pacific	Crowe Vietnam Co., Ltd.
Yemen	EMEA	Crowe AHFAD
Zimbabwe	EMEA	Crowe Zimbabwe

You can find further information about Crowe Global at the website address: [www.crowe.com/global](http://www.crowe.com/global).

## C. Corporate Governance Structure

The firm is governed by its nine-member Board of Directors, which is elected every three years in the month of December, by the Extraordinary Electoral General Meeting of Shareholders.

The General Meeting of Shareholders is the supreme governing body of the firm and meets at least twice a year. The Ordinary General Meeting as required by the company law, approves the financial statements, the admission - retirement of shareholders, the appointment of auditors, other issues and the Extraordinary General Meeting usually after the end of the auditing period, for the discussion of professional or organisational issues (and once every three years for electing new B. of D.). The

Ordinary General Meeting, for best possible fair disclosure of the financial statements of the firm, appoints as auditors, by consistent practice, two different auditing firms.

In December 2017 the new Board of Directors elected by the Extraordinary Electoral General Meeting, consists of:

• Efstratios Paparidis	Chairman
• Panagiotis Alamanos	Managing Director
• Eva Angelidi	A' Vice Chairman
• Stavros Papakanderakis	B' Vice Chairman
• Georgios Stamatou	C' Vice Chairman
• Theodoros Antonakis	Member
• Vasileios Koutsoulentis	Member
• Andreas Kyriakopoulos	Member
• Grigoris Tsaramanidis	Member

The Board of Directors meets usually once every month and minutes are kept as also at the General Meeting.

The Chairmanship of the Board of Directors, namely the Chairman, the Managing Director and the three Vice Chairmen constitute the Management Committee of the firm the functions of which are managed on a day-to-day base. The Management Committee meets almost daily as functional issues arise, without keeping minutes.

Each member of the B. of D. has been charged, soon after it was made up, upon special decision, specific supervisory competence for the firm's operations as well as for additional occasional corporate matters if circumstances so require.

Besides the requirements of the Articles of Association and, complementary to them, the operation of the firm is also governed by the following:

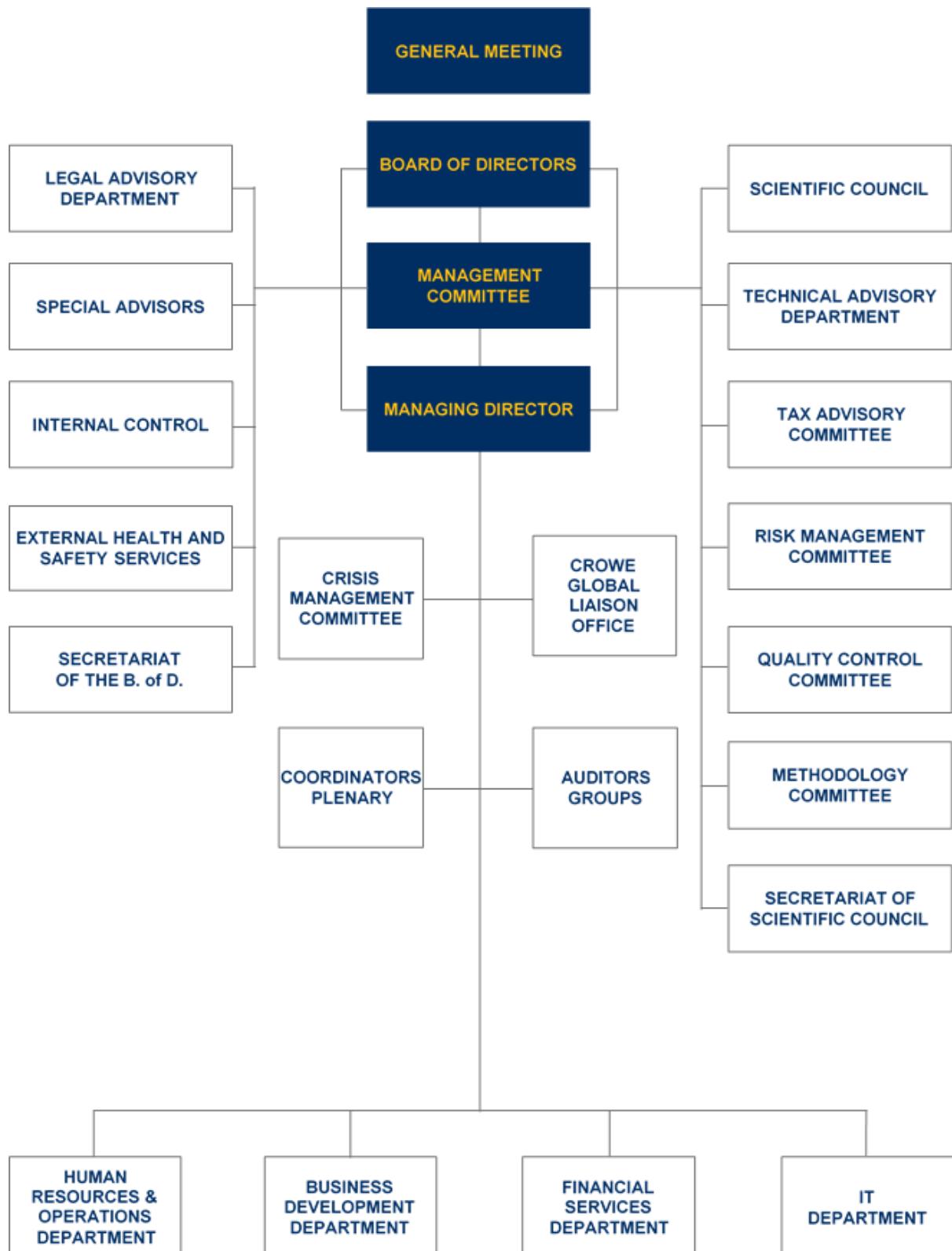
- Internal Regulation which regulates the organisation, review and monitoring of audit engagements, the distribution to auditors groups, the evaluation of audit and administrative staff, the employment of members, the fees and bonus for the reward of their hard work, productivity and professionalism, the timely and quality performance of audits, their continuous offer to the firm, as well as the out-of-pocket travel costs. Its application is reviewed by the Board of Directors.

- Quality Control System of Audit Engagements. This regulation, which is designed in accordance with International Standard on Quality Control 1 (ISQC 1), issued by the International Auditing and Assurance Standards Board (IAASB) is adapted to the requirements of International Standards on Auditing, Code of Professional Conduct, Regulation (EU) No 537/2014 and L. 4449/2017 and concerns the quality control procedures of the Audit Firm and its members auditors. Its application is reviewed at various levels by the Board of Directors and the Council, which includes the Technical Advisory Department, the Risk Management Committee, the Tax Advisory Committee and the Quality Control Committee. To the quality assurance system of the our firm we refer in detail in chapter D' here below.

Due to the large number of the auditing human resources of our firm and the consequent much variegated encountered matters, the governance system of the firm is strengthened by the operation beside the Board of Directors of several advisory departments, committees, etc. that operate beyond the attached organisational chart (Implementation of Computer Audit Programmes Committee, CCH - AUDIT CONTROL, IT Systems & Applications Committee etc.).

In the firm under the auspices of the Board of Directors operate 69 persons of Administrative personnel covering the Legal Advisory Department, the Administrative Services, the Human Resources Division and the Financial Services Division.

Thus, the organisational Chart of the “ASSOCIATED CERTIFIED PUBLIC ACCOUNTANTS s.a.” is presented in graph here below:



## 1. Management Committees

With regard to the various departments or committees that operate, as also shown in the organizational chart, next to and with the Board of Directors or the Management Committee and under their direct involvement, is clarified as follows:

- The CRISIS MANAGEMENT COMMITTEE is staffed by the Board of Directors, the head of the Legal Advisory Department, our elected members in professional bodies but also collaborators, when this is deemed necessary by the Board of Directors. This Committee is convened and meets each time legislative, institutional and critical professional issues arise.
- The Crowe Global network LIAISON OFFICE is charged with the exchange of specialised know-how with the Management and the members of the network, the disposal and provision of research, education material, the participation of "ASSOCIATED CERTIFIED PUBLIC ACCOUNTANTS s.a." Audit Firm in education, training, business meetings, seminars etc. The Liaison Office is made up, in cooperation and under the auspices of the Management Committee, of some of its Board members for monitoring the relations of the Audit Firm with the network and the member of the Audit Firm that is appointed by the B. of D. as liaison partner with the network.

## 2. Legal Support, Internal Audit and External Advisors

- The Legal Advisory Department is made up of legal scientists specialising in commercial law, under full employment status in the Audit Firm. The head of the department is a Supreme Court lawyer, expert in commercial law. The legal department members, whenever deemed necessary, have continuous cooperation with special external advisors. These advisors are tax and legal consultants, as well as Professors of Commercial, Administrative and Constitutional Law.
- The internal control serves the implementation of ISO 9001/2015 and ISO 27001/2013 certifications. The implementation is constantly checked by an internal auditor member of the firm, as well as by auditors of the certification company every year.
- The External Health and Safety Services is a service encompassing an occupational physician and technician in charge, as laid down by the special legislation in effect. The member of the Board of Directors designated for this purpose is responsible for monitoring the provision of these services.

### 3. Scientific Council

Two words: Immense work and engagement responsibility! Besides the special technical advisors working either as internal or as external collaborators, the members of the Scientific Council and its committees come from active or recently retired certified public accountants, with a long-standing experience and authorship in the field of accounting and auditing.

In the SCIENTIFIC COUNCIL an independent non-executive scientific advisor - Certified Public Accountant, of recognised competence who is its Chairman, as well as the persons in charge of the Technical Advisory Department, the Tax Advisory Committee, the Quality Control Committee and any other committee deemed necessary by the B. of D. participate in order to coordinate all these bodies for achieving the best possible quality control. The organisation and training of auditors is planned by the Management Committee in cooperation with the Scientific Council and with the participation, depending on the subject, of specialists or instructors.

- The TECHNICAL ADVISORY DEPARTMENT is staffed by active or recently retired Certified Public Accountants of special knowledge and experience in IAS (International Accounting Standards), ISA (International Standards on Auditing), Taxation and other scientific issues, in order to respond to any professional inquiries and technical problems of colleagues, the preparation, update and standardisation of audit and quality control programmes, the ongoing training of all members, etc. The Technical Advisory Department, in addition to the above, examines all Auditor's reports of public-interest entities (listed on Athens Stock Exchange, banks and insurance companies) before they are granted.
- The TAX ADVISORY COMMITTEE is made up of active or retired certified public accountants with vast experience in tax issues and external collaborators tax experts and a legal advisor of proven experience and specialisation in the object of the tax audit. The Committee provides tax advice in particular on difficult tax matters arising mainly at the tax audit of the certified public accountants, for the issue of the tax audit certificate, under article 65A of L. 4174/2013 as in force.
- The RISK MANAGEMENT COMMITTEE, monitors and supervises centrally the "Acceptance and maintenance of customers and projects" process and supports the Board of Directors in matters related to undertaking new engagements, maintaining the existing ones and approval of new customers and the assumption and management of the overall audit risk of the Audit Firm. Also, it monitors and manages regulatory compliance and professional ethics matters as well as operational risk matters but also in cooperation with the Quality Control Committee it is also involved in specific matters of quality assurance of audit engagements.

The Risk Management Committee consists of:

- a representative of the B. of D., who is appointed as Head of Ethics and Independence,
- a representative of the Scientific Council,
- a representative of the Legal Advisory Department and
- a Certified Public Accountant member of the audit firm who is appointed as Risk Management Director, with significant experience in regulatory compliance, implementation of the Code of Ethics and the terms and conditions of independence.

The Risk Management Committee is responsible for proposing to the Board of Directors, procedures for the acceptance and maintenance of customers and engagements, monitoring the implementation of the mandatory directives of the Code of Ethics and, in particular, the terms and conditions of independence, the acceptance or rejection of a Customer or an engagement, whenever required by law and the established internal procedures of the audit firm.

Furthermore, it supervises the implementation of these procedures and cooperates with the other independent committees and bodies of the audit firm for managing and resolving also other matters which provide conditions of high business and regulatory risk for the audit firm.

- The QUALITY CONTROL COMMITTEE is staffed by experienced active or retired certified public accountants (Quality Control Inspectors). It deals mainly with the post audit quality control of the undertaken audits of financial statements and other audit engagements, but also with optional audits and inspections. It also monitors and supervises the implementation of the rules and procedures of the firm's Quality Control System. Further information about its function is referred to in a following chapter on quality control.
- The METHODOLOGY COMMITTEE is staffed mainly by experienced active or retired certified public accountants with extensive experience in International Standards on Auditing, IFAC's guidelines, CROWE GLOBAL's guidelines, in order to prepare – update the audit methodology of the Audit Firm's financial statements.
- The B. of D. and the Scientific Council, in the frame of their duties, use expert technical advisors who are active or former members of the Audit Firm with special knowledge and experience in auditing and accounting, as well as institutional and regulatory matters.

## 4. Organisation of Auditors in Groups

As aforementioned, the large number of auditors led management to take a series of organisation measures to facilitate administration and achieve a more close relation of the B. of D. with the auditors, but also a better implementation of the quality control system in order to maintain audit quality at a high level.

Therefore, according to the internal regulation approved by the General Meeting, the auditing force, at the level of shareholders, non-shareholders and auditors of other grades, is structured in groups. The groups are composed by at least twenty auditors, out of which at least ten are shareholders. In each group, subgroups are formed on an optional basis with a minimum composition of three (3) shareholders with the aim of further developing the corporate culture, cooperation, exchange of knowledge and experience to provide quality projects corresponding to the history of ASSOCIATED CERTIFIED PUBLIC ACCOUNTANTS s.a. and the "SOL". The group leaders and the deputies, are the most experienced auditors of the group, called coordinators because they coordinate the group's work (personnel allocation, employment budget, appointment of auditors which review the group's audit work - Reviewers, wherever required, quality assurance action planning, coordination of audit work etc.), as provided in this respect by the firm's internal regulation. More specific matters are stated below in Chapter D.4f (page 45).

Once a month, it is called by the Board of Directors the Coordinators' Plenary were shall be discuss any kind of opportune institutional, professional issues, ways of best possible quality assurance in our engagements, as well as the course, the short-term objectives and the firm's business policy.

Regarding the matters discussed at the coordinators meetings, in which no minutes are kept, the coordinators inform the members of the group, discuss with them the best way of implementing them within the group and convey the views of the members to the Board. The B. of D. processes them, decides and posts its resolutions on the internal internet communication platform (extranet), available to all colleagues, regardless their grade.

## 5. Corporate Social Responsibility

Since 2014, our firm is a leading member of the non-profit organization "Hellenic Network for Corporate Social Responsibility with distinctive title "CSR HELLAS", fulfilling all necessary requirements, personnel-turnover and great social action. The purpose of the Organisation, which includes as leading members more than 150 large companies operating in Greece, is to promote the meaning of Corporate Social Responsibility (CSR) to both the business community and the social environment, with the ultimate objective of achieving profitability and sustainable development.

Our firm which was established and operates according to CSR's values and principles, even before its meaning was transmitted to the business community, has shown great social action from its voluntary strategic choices, such as the promotion of the auditing/accounting science, to the society [original members and members of the Board of "non-governmental organisations" (NGOs), etc.], the market players and the transparency of its operations as well as in social action, such as participations in sports and social events (blood donation in our building, every December, recycling of paper-plastic-batteries, corporate trip, participation in marathons and other sports events, donations to charities etc.).

Our firm has set up an experienced group of executives, engaged in the further development of CSE within our firm, the preparation of new programmes and actions and the development of the number of participants. The members of the group taking part in the Network's operations and monitoring the progress of legislative arrangements in the course of completion, for the promotion and publication of reports of social actions.

## 6. Quality certification

The Administration and Management system of our firm is ISO 9001/2015 certified. Also, our firm has obtained ISO 27001/2013 on the confidentiality, integrity and availability of information managed.

Proper implementation is constantly monitored by an internal auditor member of our firm, as well as by experts of the certification company, every year.

## D. Internal Quality Control System

As required under the International Standard on Quality Control 1 (ISQC 1), Crowe has designed and maintained a quality system, which provides a reasonable assurance that the firm and its human resources comply with professional standards, the Code of Conduct, the legislation and regulations governing the profession and that the audit reports and findings issued comply with the requirements.

Each member of the audit staff of Crowe is personally responsible for quality and must therefore comply with these principles and their respective implementation procedures, as described in the following chapters. In particular, the Certified Public Accountants who are shareholders and sign the audit reports shall be personally responsible for the audit carried out and the audit report they sign.

The Certified Public Accountants (CPAs) and the audit staff of Crowe are committed to the principles of independence, integrity, objectivity, confidentiality, professional conduct, professional competence and due diligence, as well as the quality of their work.

The internal quality assurance system of Crowe is designed in accordance with the requirements of the International Standard on Quality Control 1 (ISQC 1) of the International Accounting Standards Board (IASB) and the Code of Conduct for Professional Accountants which is applicable and relies on the code of conduct of the International Ethics Standards Board for Accountants (IESBA) and belong to IFAC and has taken into account the relevant requirements of the International Audit Standards (IAS), Regulation 537/2014 and Law 4449/2017. To this end, the firm has established regulations, policies and procedures to ensure adequate quality standards in the following key areas:

- **Management's responsibility for quality within our firm**

Crowe has established principles and procedures designed to promote an internal culture, recognizing that quality is essential for the performance of assignments.

- **Ethics and independence requirements**

Crowe has established principles and procedures designed to provide reasonable assurance that the firm and its staff comply with the relevant ethics and independence requirements.

- **Acceptance and continuation of relationships with customers and for specific assignments**

Crowe has established principles and procedures for the acceptance and continuation of relationships with customers and for specific assignments.

- **Human resources**

Crowe has established principles and procedures designed to provide it with reasonable assurance that it has sufficient personnel with the capacity, skills and commitment to ethical principles, administrative and legal requirements related to quality control.

- **Execution of assignments**

Crowe has established principles and procedures designed to provide a reasonable assurance that the assignments are carried out in accordance with professional standards and applicable legal and regulatory requirements, and that the awarding partners issue reports appropriate to the circumstances.

- **Monitoring**

Crowe has established a series of monitoring actions designed to provide a reasonable assurance that the principles and procedures relating to the quality system are relevant, adequate and effective.

In particular:

## 1. Management's responsibility for quality within the firm

Crowe has established principles and procedures designed to promote an internal culture, recognizing that quality is essential for the performance of assignments.

- The Board of Directors of our firm has the ultimate responsibility for the quality system and the application of the rules of the Code of Conduct. It is responsible for maintaining quality control procedures and therefore selects individuals with the appropriate knowledge, ability and experience to staff its bodies entrusted with quality control.
- The Management requires Certified Public Accountants and the audit staff to know and strictly follow, in executing their work, the principles and methods that have been notified to them, namely:
  - The (general and specific) legislation governing the public practice of the profession (legal framework).
  - The auditing standards and the Code of Professional Ethics (CPE).
  - The General Professional Guidelines (GPG) of the Institute of Certified Public Accountants of Greece and the Hellenic Accounting and Auditing Standards Oversight Board (HAASOB).
  - The Articles of Association, the Regulations, the Quality Control System and the methodology manuals of our firm

- The Administrative Decisions of the Board of Directors of our firm
- The Technical instructions of the principles and methods of the Board of Directors and the Scientific Bodies of firm
- In order for the audit findings to meet the standards provided for in each case, the Management systematically informs the members of the firm with seminars, memos, meetings (e.g. plenary meeting of coordinators), newsletters, decisions and circulars of the Management, etc. on the importance and manner of success of the audit work, so that each assignment is carried out in accordance with the International Audit Standards and the specific legal and administrative requirements and the audit reports issued be appropriate for the circumstances.
- The bodies competent for the monitoring of compliance by CPAs and the firm's audit staff, the principles and methods of quality, integrity, objectivity, independence, confidentiality and professional conduct, as well as the provision of instructions to CPAs and the audit staff, in order of priority, are:
  - The Board of Directors of our firm
  - The member of the Board of Directors appointed by it as the person responsible for monitoring.
  - The Scientific Board, the Technical Office, the Risk Management Committee and the Tax Committee (for CPAs) provide advice and guidance where appropriate.
  - The Quality Control Inspectors, who are members of the Quality Control Committee for CPAs and the audit staff of the other ranks.
  - The Coordinators of the teams, for their team and the sub-team heads for their sub-team.
  - The persons reviewing and critically evaluating the audit work of the CPAs (Reviewers), who must be appointed in the audit of Public Entities.
  - The supervisors of the work of CPAs (for the audit staff).
- The high quality audit work is rewarded in accordance with the regulation on remuneration, which has been approved by the General Meeting of the shareholders of the firm, in the context of the evaluation of professional performance, studiousness, behaviour, diligence, attracting and retaining customers, continuous service, carrying out tasks, timely collection of fees, etc. of members, from their supervisors. Otherwise, the penalties imposed to protect the reputation of the firm and its members from any insufficient audits are particularly severe, as analysed below.
  - If serious omissions and infringements by the CPAs are found in the evaluation reports of the Quality Control Inspectors, the Board of Directors, where appropriate, shall impose similar penalties against the persons responsible. In cases of other infringements, the Coordinator, the scientific bodies and the CPA who is in charge of the audit assignment shall report to the B. of D.

- Depending on the severity of the infringement, the Board of Directors, with the assistance of the legal service and scientific bodies, shall impose the following indicative sanctions or measures, both individually and cumulatively.
  - Recommendation.
  - Recommendation with fixed term of correction.
  - Reprimand.
  - Supervision of the auditor or audit work by an Auditor appointed by the Management.
  - Pecuniary penalty.
  - Replacement of the auditor.
  - Suspension of the right to sign Audit Reports under the name of our audit firm
  - Referral to the General Meeting with the question of expulsion (for CPA who are shareholders).
  - Dismissal from the firm
  - Report to HAASOB and the Supervisory Board of SOEL (for audit staff).
  - Legal actions.
- Our firm has sufficient resources and makes continuous investments (scientific bodies, special audit computer programs and similar internal communication, but also additional investments as appropriate), to support the principles and procedures of the quality control system.

All members of the Management, who supervise Committees or are responsible for the quality control system, have the experience, ability, status and competence to assume such responsibilities.

## 2. Application of ethics and independence rules

The firm has established principles, rules and procedures, which provide the reasonable assurance that its members and itself comply with the respective standards of professional ethics provided for in the Professional Ethics Regulation of the members of the Institute of Certified Public Accountants of Greece (Government Gazette, Series II, No 3916/07-11-2017), which relies on the Code of Conduct for professional accountants of IFAC, as well as on Regulation (EU) No 537/2014 and Law 4449/2017, the requirements-instructions of HAASOB, SOEL and the Management of our firm. These rules focus on the following basic principles:

- Integrity
- Objectivity
- Professional competence and due diligence
- Confidentiality, and
- Professional conduct

In order to verify compliance with the basic principle of maintaining the independence of Crowe and its auditor, in respect of the entity, it is considered that the following instructions of the Code of Conduct are respected:

- Absence of any financial, professional or other relationship between the auditor or Crowe and the entity to be audited which could lead an informed, objective and prudent third party to the conclusion that the independence of the auditor or of Crowe is at stake.
- The acceptance of the entity to be audited is not contrary to any incompatibility or rules of professional ethics.
- Where the entity to be audited was audited by another audit firm, the written opinion of the previous auditor should be obtained.

In the event that a CPA detects any threat to its independence from existing or new entities to be audited, he/she shall apply appropriate quality controls to eliminate these risks, or to address them at a commonly accepted satisfactory level, otherwise he/she shall be obliged to inform in writing the member of the B. of D. of our firm, who is responsible for matters of ethics and independence, and the Risk Management Committee, and if the matter is serious, the removal of the CPA from the audit shall be considered and the Management of the audited entity shall be notified.

In particular on the issues of incompatibility, independence and ethics, additional procedures have been established, such as:

- By decision of the Board of Directors, our firm adopted the clarifications of SOEL regarding the application of Article 4 and 5 of Regulation (EU) No 537/2014, which it posted on its internal internet communication platform (extranet) and incorporated into its internal culture.
- The contracting department and the Managing Director, or another member of the Board of Directors who certifies the audit assignments to the CPAs, shall check any assignment of audit work, as regards any apparent incompatibility and possible issues related to remuneration. Difficult cases shall be resolved in cooperation with the CPA concerned with the Risk Management Committee.
- The firm shall not provide to the audited entities any additional non-audit work, which could be considered incompatible or constitute potential threats to independence, unless risk mitigation measures are taken at an acceptable level. The provision of any additional and audit work shall be examined and approved by the Risk Management Committee or by the Managing Director, always taking all necessary steps to ensure the independence of the CPA and our firm.
- The auditor may not participate, directly or indirectly, in any decision-making related to the activity of the audited company.
- When the auditee creates stressful situations for the auditor and his/her independence is at risk, he/she shall report them to the ethics and independence officer.

In serious cases the matter shall be discussed in the Risk Management Committee and then, if it is decided to withdraw the auditor from the audit, the firm and the supervisory authorities shall be notified of the refusal to perform the audit.

- The auditor shall not be allowed to accept assignments where there are conditions of self-interest. Our firm, in any case where the independence of its auditor is put at risk, shall, in cooperation with the responsible auditor, take steps to eliminate this risk or reduce it to a tolerable level, otherwise it will withdraw from this audit after having informed and obtained the permission of HAASOB.
- The Management of our firm shall not intervene in the work of its auditors, nor shall it take any action that could, even at the very least, affect the objectivity and independence of its auditors.
- It is not permissible for any member of the audit firm, irrespective of their rank, to be a member of the board of directors of a public limited company or a manager-partner of a limited liability company or a member of the management of another form of capital company and, in any case, to have the status of a trader, without a relevant authorization from the B. of D.
- Crowe shall undertake no accounting operations (bookkeeping, etc.) for any audited company, as long as such operations jeopardize its independence and no risk mitigation measures can be taken at an acceptable level.
- In order to undertake any non-audit work in an international client company of the Crowe Global network, our audit firm shall refer to the relevant list posted on the internal internet communication platform (extranet), to verify that such work creates no problem to the independence and objectivity of the member who performs the audit.
- All offers and contracts to the auditees shall be submitted only by the Board of Directors. In any other case, where the Management of our firm becomes in any way aware that the independence of any of its auditors may be at risk, it shall directly intervene to protect the other auditors of our firm as well as the reputation of its reputation.

### 3. Acceptance and maintenance of audited entities

The evaluation of new projects and new candidate clients and the ongoing investigation of existing clients shall be carried out at first by the Partners and the assignment teams.

In deciding whether a new client will be accepted or an existing one will be maintained and whether new projects will be undertaken, the following shall be, among others, considered: (a) the integrity of the Management of the entity; (b) the particularities of the assignment and the ability to execute the assignment by Crowe, (c) the threats of independence and their restriction in order to ensure in every respect the independence of Crowe and the assignment team; (d) the regulatory risk of participation of the Client and the other parties involved in the work involved in money laundering and terrorist financing under the requirements of Law 4557/2018 and (e) the total audit risk of the assignment.

Any request for the acceptance of the assignment of work from a new or existing client, as well as the acceptance of the assignment of work to an entity of public interest, or the provision of additional

audit work or additional specific non-audit work, shall be notified for consideration to the Risk Management Committee. The assessment of the client, as well as the risks of each new assignment, shall be documented using a special questionnaire, which is forwarded to the Risk Management Committee and precedes the final acceptance of the new client and the new job and the drafting of the assignment letter.

In particular:

For the entities to be audited addressing directly to the Management in order to be audited, an experienced CPA shall be authorized to visit the Management and the Financial Department of the entity to be audited before the acceptance of the assignment and to evaluate it by completing a relevant questionnaire:

- The identity, reputation, behaviour and integrity of the members of the Management of the entity to be audited and the absence of any threat against the independence of Crowe and the auditor or the rules of conduct (e.g. unpaid fee to a previous audit firm, etc.).
- The business activity, the practices of the auditee, the behaviour of senior executives/ shareholders and the financial statements.
- The persistence of the Management of the auditee to maintain the fee at low levels and any indications to limit the scope of the audit. The reasons for the selection of Crowe and the reasons for not selecting the outgoing audit firm.
- The audit risk that is directly visible to the auditor. Any indications of the Management for money laundering or other criminal acts.
- Any adverse circumstances of the entities.
- If the prospective client was audited by another audit firm, the prior auditor's opinion in writing on any disagreement with the client shall be requested in writing.
- The possibility of Crowe to properly perform the assignment by the entity shall also be considered, such as:
  - The required knowledge and experience of the audit staff in the industry concerned.
  - The adequacy and availability of the audit staff for the completion of their work within the set deadlines.
  - The availability of available experts to carry out their work.

In any case, the CPA shall inform the entity to be audited of the principles and methods applied by Crowe for accepting and retaining an audited entity with a relevant "letter of assignment" or a "letter of offer", a copy of which shall be placed in the audit file. If the entity to be audited sends an official decision by its delegated bodies to select Crowe, an audit order to a specific auditor shall be issued

by the Assignment Department under the responsibility of the delegated member of the B. of D. of our firm. Copies of the above documents shall be archived in the Register and Assignment Departments, as well as in the audit file of the assigned auditor.

In the event that an entity to be audited addresses directly a CPA, then the evaluation of the acceptance or retention of the audit assignment shall be performed by the specific CPA, who shall cooperate with the coordinator of the team which it is part to, taking into account all the above.

For every financial year, a document of acceptance and retention of the audit assignment shall be prepared by the assigned CPA and any change in the Management of the audited entity or the fee shall be monitored and archived as above (audit file). The assigned CPA shall be responsible for monitoring the audited entity. Non-acceptance or non-retention of an audited entity shall be subject to the approval by the Board of Directors of our firm.

## 4. Human Resources Management

Our firm has established appropriate principles and procedures in order to provide a reasonable assurance that it has adequate and competent audit staff, committed to the ethical, administrative and legal requirements, which are necessary to effectively fulfil its obligations. The staff shall be recruited, selected, trained, evaluated and developed on the basis of principles and procedures providing appropriate safeguards for the development of the required competences. Such principles and procedures relate to the following issues:

### 4a. Attracting and selecting staff

The purpose of the firm is to select employees with integrity, very good or excellent educational background, interest and willingness to pursue a career and a willingness to constantly improve their knowledge in their field.

The firm plans its staff on an annual basis, asking its teams to assess their needs based on their work, while taking care of the best possible utilization of all its staff.

The firm aims at achieving the best quality of audit work, ensuring the adequacy of human resources and professional capacities, but also utilizing the local scientific potential of the regions where its branches are established. It is also known that the firm is a multi-shareholding company. The objective of the Management, and therefore the shareholders, is the sustainable operation of the firm with investments in scientific human resources and know-how, in order to achieve the best quality result coupled with high profits and dividends.

The firm attracts staff by posting ads on its website ([www.crowe.gr](http://www.crowe.gr)) or other job and career management websites or by publishing ads in major political or economic newspapers.

In addition, the firm participates in career events organized by the liaison offices of major universities in the country, where it is offered the opportunity to get in touch with a wide range of new future professionals.

Finally, through the internship programs implemented in collaboration with major educational institutions, it enables new prospective professionals to get in touch with the firm's work environment and to join audit teams by taking on supporting roles. In this way our firm contributes to the training of these young people and lays the foundations for excellent future partnerships.

### **The appropriate candidates**

New entrants trainee Certified Public Accountants typically have the following formal qualifications:

- Diploma of a Higher School of Economics, preferably in the fields of Accounting, Auditing or Business Administration.
- A postgraduate degree, particularly in the field of Auditing and Accounting, is considered an additional formal qualification.
- Postgraduate professional qualification, professional certification, subject-related training, other certifications (IESOEL, ACCA, ICAEW, JES, etc.) are considered as additional formal qualifications.
- Very good knowledge of at least one foreign language, preferably English.
- Great familiarity with the use of PCs (M/S Office, M/S Excel, M/S Word, Accounting Management Programs, etc.).
- Previous professional experience in the auditing or accounting profession.

### **The selection of suitable candidates**

- The Human Resources Department collects the CVs and evaluates the formal qualifications of the candidates.
- It conducts interviews with candidates and selects the most competent ones.
- The final selection of suitable candidates is decided in cooperation with the Heads of the Audit Teams with the Human Resources Department and approved by the Management.
- Upon completion of the recruitment process, the firm is briefly introduced to new entrants and soon holds an **Induction Program** whose aim is to integrate them into the firm, to familiarize them with the general principles of the profession, to inform them of the Legislation and Ethics

governing the profession, as well as of the principles and methods applied by the firm and its scientific bodies.

#### 4b. Assessment of staff performance

The members of the firm (Audit and Administrative Personnel) are evaluated on an annual basis by means of evaluation sheets prepared for this purpose, in accordance with the management and administration procedures.

The firm implements a Performance Management System with Evaluation Certificates adapted to the specific requirements of the roles.

This system assesses the contribution to the overall result of the firm through the achievement of performance objectives, technical skills, such as technical training and compliance with professional ethics and procedures of the firm, as well as professional skills and behaviours that are considered important for the achievement of the result.

The process is implemented through a series of meetings between the person assessed and the assessor, whose object is:

- to set and agree on the objectives;
- to assess the progress of results over the year, individual performance and achievement of objectives, and finally
- to identify areas and ways to improve the skills of the persons assessed.

Throughout the year, guidance and support is provided to the persons assessed by the assessor (at all levels) with a view to achieving the objectives.

The Trainees are assessed by the CPAs who monitor them, the CPAs by the heads of the individual teams and the latter by the coordinators. Finally, the coordinators are evaluated by the Board of Directors. The persons assessed have the opportunity to express their comments and opinions at any stage of the procedure, either orally or in writing in their evaluation sheet.

The evaluation sheets are kept in the folder of employees / members by the Human Resources Department.

## 4c. Training and capacity building

- **Professional Certification Programs:** All newly recruited members of the audit staff are enrolled in the Institute of Education of the Institute of Certified Public Accountants of Greece (IESOEL), ACCA, ICAEW or any other equivalent body for their required professional training, if they have not already completed or are not attending any of the above programs. During their at least two year-long studies, they are trained in all theoretical and practical subjects related to the profession.
- **Guidance Program:** The newly recruited staff is integrated in an audit team of our firm. During the performance of their duties, they are monitored daily, guided and supported, on a continuous and systematic basis, by a more experienced member of the team.
- **Internal Internet Communication Platform (extranet):** The firm systematically notifies its staff and members of any developments in professional standards, techniques, principles and methods through its internal online communication platform (extranet). More specifically, the Scientific Council immediately informs the members about each change of legislation, standards, etc., by holding special trainings and issuing instructions on the techniques, principles and methods to be followed to address them.
- **Lifelong vocational training:** The Board of Directors, following a recommendation from the Scientific Council, approves lifelong vocational training programs for all the audit staff of the firm (CPAs and staff of other ranks), while the Scientific Council encourages the audit staff to engage in individual development activities (publications, etc.) and evaluates their work.

As provided for in Article 12 of Law 4449/2017, in order to maintain its professional license, the firm organizes lifelong training programs in all fields of knowledge, such as e.g. International Standards on Auditing (IAS), International Financial Reporting Standards (IFRS), Code of Conduct, methodology, computerized audit programs, tax issues, etc. In addition, the CPAs are encouraged to participate in the seminars organized for this purpose by SOEL, HAASOB or CROWE GLOBAL on a regular basis.

## 4d. Professional development and fees

### Development

Members, other than CPAs, are promoted, following a positive proposal from the supervising CPA and the Coordinator of the team, on the basis of their previous experience, their performance in the training programs, their evaluation, the observance of professional ethics and the principles and rules of our firm, their interest in the profession, their behaviour towards the audit team and the auditees.

## Promotion

Members are promoted to the rank of Certified Public Accountant (CPA) and registered in the public register, when:

- They successfully complete the courses of the required subjects, through written examinations conducted by SOEL on the basis of the rules of professional examinations and under the supervision of HAASOB, as provided by the applicable legislation, and
- They have the experience required by law.

After obtaining the professional license of Certified Public Accountant (CPA), and provided that the necessary conditions are met, with the consent of the supervising CPA, the team coordinator and the proposal of the Board of Directors, they can, if they wish, acquire the status of equal shareholder, after their approval as new shareholders, by the Ordinary General Meeting of our firm.

## Fees

Employees of our firm shall receive the basic remuneration (basic remuneration, time, family, postgraduate allowances, etc.), in accordance with the regulation applied by our firm.

In addition, upon consideration by the Board of Directors, the members may be paid additional benefits in various ways, the amount of which, upon consideration and approval by the Board, shall be determined by the Coordinator of the team in cooperation with the supervising and assigned CPA. The annual evaluation, the achievement of the objectives, the observance of the ethics and procedures of the firm, the behaviour towards the customer, team spirit, planning and organization, taking initiatives, management and development of people, as described in the Firm's Performance Management System, shall be all considered.

## 4e. Welfare and care for staff

The firm takes care of the well-being of the staff and is always helpful and supportive in any difficulties faced by its members.

It shall organize three major events for its staff on an annual basis, and shall also participate in sports activities on a voluntary basis and shall contribute significantly to the Blood Bank of SOEL, through the organization of voluntary blood donation at its offices.

The firm offers a clean, safe and smoke-free working environment and actively participates in the recycling of paper and other materials.

For issues of exceptional needs, difficulties or even problems of its staff, even outside the professional environment, the firm is always willing to provide its support with individual assistance programs, strengthening its links with its people.

#### 4f. Establishment of audit teams

The audit work is entrusted to personnel who have the required degree of technical training and specialization and have sufficient time to carry out the assignment.

##### **Firm's planning of audit staff**

At the beginning of the audit period, the Coordinators, in cooperation with the Lead and Assigned Auditors of each team, shall draw up an action plan for the team to carry out the audits for which orders have already been received or are expected to be received. This plan provides for:

- A schedule of each audit
- An audit team that will support the assigned CPA in carrying out each audit. The allocation of staff to the various audits is done according to their experience in the subject.
- The time and staff of the team, to undertake any new and extraordinary work.

If a team has available time, it informs the Board of Directors in order to plan the employment of the auditors for this time, in other teams or other tasks assigned by the Board.

##### **Assignment of audits to staff**

Audits are assigned by the firm's Board of Directors or by an authorized member of the Board of Directors as follows:

- If the audited entity has expressed in writing its preference for a specific CPA, if there is no other reason (incompatibility, etc.) and taking into account the following criteria, after the specific CPA is assessed for his/her appointment in the audit assignment, its preference is accepted and the specific CPA is appointed by the Chairman or the Managing Director, along with an alternate.
- If the audited entity chooses the firm as its auditor without preference in a CPA, then the auditors and their alternates are appointed by the Chairman or the Managing Director and they are assessed for the acceptance of the audit assignment, based on the following criteria:
  - Knowledge and practical experience in the subject
  - Knowledge of professional standards, administrative and legal requirements
  - Appropriate knowledge and skills in IT systems and applications
  - Increased professional knowledge
  - Satisfactory assessment of audits performed in the past, by the team coordinator and the Quality Control Inspectors
  - Available time and staff of the CPA
  - Absence of incompatibilities for the audit
  - Assessment for accepting or retaining the audit
  - Knowledge of the established principles and quality control procedures of the firm.

At the meetings of the Board of Directors, the Chairman and the Managing Director normally provide a briefing about these assignments.

The details of the assigned partner are communicated to the client's management and to those responsible for governance.

The assigned partner bears personal responsibility for the quality of the audit as well as for the audit report he/she signs.

## 5. Carrying out audit work

At the beginning of the audit, the assigned CPA or his/his partner, also a CPA, shall carry out the appropriate planning of the audit work and in conjunction with the audit risk undertaken, a specific audit program shall be developed for each audited undertaking, in accordance with the requirements of the International Audit Standards, which shall describe the audit procedures and determine the appropriate members of the audit staff to handle the individual subjects.

During the execution of the audit work, there shall be appropriate planning and adequate guidance and supervision as well as inspection of the audit work at all levels, as specifically mentioned in the quality assurance system of our firm, in order to provide reasonable assurance that the audit carried out meets the requirements of the International Audit Standards relating to quality control.

### **Procedure for execution-supervision of the assignment**

The audit work is supervised and guided by its head, who is the assigned CPA or, in certain cases, another partner appointed by the assigned CPA after consultation with the team coordinator.

#### **The head of the audit work:**

- (a)** undertakes responsibility for the quality of any audit work entrusted to him/her;
- (b)** establishes, by completing a relevant questionnaire, whether there has been full compliance with the ethical requirements and in particular with the principles of independence and objectivity that apply to the members of the audit team in each audit work assigned, including Reviewer independence issues;
- (c)** verifies, by completing a relevant questionnaire and adequate documentation, that the prescribed procedures concerning the acceptance and maintenance of the audited entities have been followed and the specific conditions for the assignment of the audit work have been complied with;

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- (d)** is convinced that all the members of the audit team have the appropriate knowledge and experience to be able to complete the audit work in accordance with the International Audit Standards and the provisions of the applicable legislation;
- (e)** undertakes responsibility for the guidance, supervision and handling of the audit work undertaken, in accordance with International Audit Standards;
- (f)** undertakes responsibility for the adequate documentation of the audit work and the collection of adequate and appropriate audit evidence, on which he/she is based for the issuance of the audit report;
- (g)** collaborates with the members of the audit team on difficult and controversial issues arising from the audit and encourages cooperation between the members of the audit team;
- (h)** contacts the competent scientific or other bodies of the firm, in order to receive relevant instructions for dealing with issues that may arise during the audit. This documentation shall be documented in a relevant worksheet.
- (i)** in cooperation with the Reviewer, where appointed, shall contact in writing the competent bodies of Crowe, to consult them on difficult and controversial issues of the audit and shall receive written instructions for the resolution of these issues. This communication, which includes the relevant question and an answer, shall be documented in a relevant worksheet.

### **Review procedure**

For the audits of the financial statements of the audited entities, the head of the audit work shall, in cooperation with the Coordinator:

- ensure the appointment of another CPA as Reviewer, where required, for the purpose of critical evaluation of the audit carried out (preventive quality control);
- discuss with the Reviewer any important issues that may arise during the planning and conduct of the audit, the observations to be included in the audit report and the type of audit report;
- ensure that a review report is not provided before the critical assessment is completed by the reviewer.

In the event that there are differences of opinion on various issues between the responsible CPA and the Reviewer (for the critical assessment of the audit carried out), the head of the audit work shall address the Scientific Council and the Board of Directors, as appropriate, in order to address these issues.

Reviewer duties can also be undertaken by the Coordinator of the audit team or another responsible CPA who is a member of the same audit team, with increased prestige, extensive experience and knowledge in the audit of financial statements.

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**In particular, the Reviewer:**

- shall be informed by the assigned CPAs, at the beginning of each audit period, of all audits of financial statements for which he/she has been designated as responsible for the critical assessment of such audits (preventive quality control);
- shall discuss with the CPA who is responsible for the audit and review the planning and execution of the audit, as well as any reservations or observations to be included in the audit report;
- assess the audit of the financial statements, by completing a relevant questionnaire, prior to the issuance of the audit report, in order to verify that it was performed in accordance with the instructions of the International Audit Standards;
- assess whether the planned audit of the financial statements is appropriate based on the audit findings;
- conduct a critical assessment of the audit carried out in a spirit of good cooperation and by encouraging the development of a culture of quality in the projects undertaken by all auditors;
- inform, in writing, the Board of Directors in case the supervisor of the audit work does not comply with his/her instructions.

**Consultation Procedure, Quality Control Overview**

In the workplace, during the audit, the head of the project trains and trains the existing ones, with the aim of improving the quality of their work. In particular, he/she shall alternate the audit objects at the lower ranks, explain the purposes of the procedures applied, refer and combine the objects of the procedures in the legislation and standards relevant to them, and during or at the end of the working hours, shall check the completeness of the audit sheets, adequate documentation of the findings and shall complement any additional procedures and explanations.

In any case, the assigned CPA shall ensure that the audit has been carried out with the required professional skepticism and that the International Audit Standards, as well as all administrative, legal and ethical requirements of the audit, have been complied with.

At the end of the audit of each entity, the head of the project, in the presence of the members of the audit team, carries out a summary of the observations and suggestions resulting from the audit and prepares a relevant worksheet.

After the completion of the audit work, the audit sheets of the lower-ranked auditors are always co-signed by the head of the audit work who is responsible for the quality of the audit work. Each audit is carried out in accordance with the guidelines of the International Audit Standards, supported by an appropriate audit schedule.

On the basis of the audit evidence gathered by the audit carried out, the assigned CPA shall prepare the Audit Report and informs the Management of the audited entity. In the event that normal omissions are detected during the audit by the audited entity, then the auditor's report shall be prepared and delivered under the responsibility of the assigned CPA, in accordance with the SOEL circulars, with the consent of the Reviewer, where designated.

However, in the event that unusual issues are found during the audit, which are difficult and controversial, the assigned CPA shall avoid delivering a report before receiving relevant advice from the CPA responsible for the critical evaluation of the conducted audit (Reviewer), the Scientific Council and the Board of Directors according to the importance of the issue.

In the event that the CPA considers that it is possible to deliver an audit report without expressing an opinion or with a negative opinion he/she shall, in cooperation with the Reviewer, where appointed, address the Scientific Council, which in cooperation with the Legal Service and the Board of Directors, will grant relevant advice on addressing the issue or issues that have arisen.

Also, in case of audit of financial entities of public interest, the CPA shall, before the issuance of the audit report, address the Scientific Council to receive advice on the most important audit issues and the supplementary report and, if necessary, the B. of D.

### **Tips - Documentation - Differences of opinion**

Where necessary, the firm should seek expert advice from within or outside the firm.

The head CPA of an assignment will identify the areas and fields of his/her audit for which expertise is required. Indicatively, the following fields are mentioned:

- Technical audit - accounting issues
- Legal - labour issues
- Tax issues
- Institutional issues
- Computerization - Information technology issues
- Quality certification
- Assessment of accounting estimates of the Management of the financial units, in accordance with the International Audit Standards and, where applicable, the International Accounting Standards
- Determination of quantities or physical condition of assets

- Determination of amounts required for specialized techniques or methods (e.g. actuarial study, etc.)
- Measurement of completed projects, as well as work to be completed as part of ongoing contracts
- Other advisory issues.

**The individuals and services assisting the work of the CPAs of Crowe as experts are:**

- For technical accounting and auditing issues, the Technical Office of the firm, as well as special technical consultants, with a significant contribution in the audit profession and active participation in the scientific bodies of the profession, as well as a significant contribution in the Accounting and Auditing Science.
- For legal-labour issues, the Legal department of the firm consisting of experienced lawyers at the Supreme Court and other lawyers.
- Taxes issues are covered by the tax committee and by external tax experts.
- For institutional issues, active or retired CPAs with extensive experience in the subject matter, with the assistance of the Legal Service and the Risk Management Committee.
- For the issues of computerization and other consulting services, the CPAs are assisted by the computer department of our firm and by external partners, as required.
- For specific technical quality issues (ISO), a cooperation with an expert ISO certification company has been established.
- For other consulting issues, the auditors of our firm through the Scientific Council may cooperate with other external partners through companies or consultants with whom has been established a cooperation.

The scope of documentation provided by expert advice on difficult and controversial issues varies depending on the type and nature of the subject matter. This may start with an advice or an opinion and escalate as appropriate. It may include, for example, finding a solution after a relevant scientific research, issuing a relevant written opinion, providing the CPA with the appropriate scientific material (special publications, Government Gazette Issues, special programs), or involving the consultant in the execution of a specialized part of the project.

In case of differences of opinion between the assigned CPA and the one providing the advice, the assigned CPA shall inform the B. of D. of our firm in writing, in addition to the reviewer, and the B. of D. shall refer the matter to the Scientific Bodies and the Legal Service accordingly. A final decision shall be made after a meeting of all those concerned. The auditor's report shall not be issued until the matter has been definitively resolved.

## 6. Monitoring and Supervision

The appropriateness and operational efficiency of the quality control principles, methods and procedures by Crowe is continuously monitored, in accordance with the specific provisions of the quality control system of Crowe.

The Quality Control of the CPAs work is carried out by the inspectors forming the Quality Control Committee (QCC) which has at least three members, is independent and reports only to the Board of Directors of our firm. Depending on the needs for the performance of quality control, the B. of D. of our firm may increase the number of auditors of the audit committee.

The audit files of the selected audit work shall be delivered by the CPA to the audit committee within a reasonable time.

The Quality Control Committee (QCC) shall carry out the quality control in accordance with the provisions of the regulation and any additional instructions issued by the Board of Directors concerning the control of regulatory compliance and implementation of International Audit Standards, as well as the methods and procedures established by Crowe. The Board of Directors, in cooperation with the members of the QCC, determines the time of completion and submission of the results of the quality control to the same. Preventive checks and inspections are also carried out by the QCC.

In particular, during the quality control exercise, the QCC inspectors:

- Shall examine whether the International Audit Standards, the existing case-by-case legislation, the Code of Professional Ethics and the Quality Control System of Crowe have been respected during the execution of the audit work.
- Shall verify that the audit file contains all the information required by the legislation, the International Audit Standards and the ethics regulation.
- Shall discuss with the assigned CPA the type of audit work undertaken and compliance with administrative and legal requirements.
- Shall review the financial statements of the audited entity and the auditor's report.
- Shall examine the suitability and completeness of the report issued by the auditor.
- Shall examine the audit risk of the audited entity, as well as the adequacy and appropriateness of the audit evidence gathered during the audit.
- Shall examine the appropriateness of the audit strategy.
- Shall examine the difficult and contentious issues on which there was disagreement among the members of the audit team and how to deal with them.
- Shall examine the issues reported to the Management and those responsible for the governance of the audited entity or other Administrative Authorities.

- Shall examine whether the drafted worksheets meet the key requirements of the International Audit Standards.
- Shall review selected worksheets concerning important decisions made by the audit team.
- Shall examine whether there is adequate and appropriate documentation of the audit findings.
- Shall assess the findings of the audit, as well as the relevance of the respective funds for which no correction was made to the financial statements.

Every three years, the Board of Directors aims to inspect the quality control of all auditors dealing with large companies of public interest, which are audited by our firm and, within six years, it shall inspect all the rest.

The selection criteria for the sample shall be determined by the Board of Directors following a recommendation from the Scientific Council and the Quality Control Committee taking into account:

- the sector of the entity,
- the size of the entity,
- the type of audit (regular, semi-annual, consolidation, etc.);
- whether the entity belongs to companies of public interest,
- whether there are significant audit risks in the entity,
- whether quality control by law or regulation is required,
- whether a qualitative audit of the audit work has been carried out by a reviewer prior to the issuance of the audit report,
- the amount of the audit fee,
- the composition of the audit team,
- the results of previous quality controls, as well as any other specific criteria, which the Board of Directors adopts on a case-by-case basis.

The B. of D. of our firm may select the categories of CPAs to be audited, but has also the option, when it deems it necessary, to perform a quality control on exceptional or regular and work not included in the sample.

The selection of QCC inspectors is made by the Board of Directors of our firm at the beginning of each audit period, with candidates being CPAs or suitable qualified persons outside the firm (retired former members of our firm), based on the following criteria:

- Extensive experience and competence in the profession (previous service), in terms of standards, principles, methods and procedures established by Crowe for the implementation of the IAS and any relevant legislation.
- Expert knowledge (accounting-auditing issues, IAS, audit methodology, commercial issues, tax issues, computerized applications of audit programs, etc.).
- Special training.
- Impartiality, prestige and independence from the CPAs inspected.
- Confidentiality.
- Integrity.
- Professional judgment on the essential.
- Processing speed (productivity).

The quality control inspectors are replaced by a relevant decision of the Board of Directors, in case where the latter considers, at its discretion, that they do not carry out their work objectively or diligently. Former quality control inspectors are re-eligible.

After the completion of each quality control, the QCC prepares an evaluation report which it submits to the Board of Directors in duplicate, and the latter forwards one copy to the CPA inspected together with any comments-suggestions.

At regular intervals, the QCC submits a work table and the CPA who performed the audit to the Board of Directors of our firm, along with the findings from the audits and the relevant suggestions. The B. of D. evaluates the findings of the QCC and together with any suggestions and recommendations, notifies them to the CPAs.

In case where the assigned CPA disagrees with the quality control inspectors regarding the evaluation of his/her audit work, he/she submits an objection to the B. of D. of our firm, which may then refer it, at its discretion, to the Scientific Council for a definitive resolution of the dispute.

The quality control system for the audit work of our firm is subject to continuous monitoring, examination and evaluation by the Quality Control Inspectors in order to provide a reasonable assurance that the principles and procedures established are appropriate, effective and followed in practice.

At the end of each fiscal year, the QCCs prepare and submit to the Board of Directors a report informing them of the inspections they have carried out, their key observations and suggestions and the overall assessment of the firm's quality system.

In case of any failure of the system or any other malfunctions during the quality control, corrective action shall be taken with a relevant decision of the Board of Directors.

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The quality control system is continuously inspected and monitored for its suitability and effectiveness by a member of the Board of Directors and the members of the Quality Control Committee, who are appointed for this purpose by a relevant decision. The inspection and monitoring of the quality system is documented by these members by means of submitting a report to the Board of Directors with the findings of their work.

Any complaints and claims by CPAs or third parties regarding non-compliance with this quality control system are evaluated by the Board of Directors of our firm and appropriate measures are adopted.

The B. of D. of our firm takes all appropriate measures to demonstrate to each interested party that the principles and procedures established by this Quality Control Scheme of the Audit Work are adhered to.

The above quality control system may be amended and supplemented by decisions of the Board of Directors of the our firm.

For those issues which are not covered by the quality control system, the International Quality Control Standard 1 “Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements” and Standard 220 “Quality Control for Audits of Historical Financial Information” of the International Audit Standards, shall be applicable.

## 7. Confidentiality, security of information and privacy

The firm shall handle with particular sensitivity and diligence the information and data of the entities to which it provides professional services and which it receives or is notified of in the context of the execution of the tasks assigned to it.

The procedures for handling confidential information and data of the entities to which we provide our professional services are based on the IFAC Code of Conduct and include internal safeguards for computer applications, protection of audit files (physical and electronic), continuous updating of the audit staff, monitoring and the supervision of the relevant Management Committees and supervisory procedures at the level of audit teams by the Coordinators of each team.

Recognizing the criticality of information and information systems in the execution of the firm's operational functions, the Management supports and promotes actions aimed at ensuring the safe operation of the systems. For this reason, the firm takes the necessary steps at technical and organizational level to ensure the integrity, availability and confidentiality of the information it processes. At the same time, it implements policies and procedures to:

- define the organizational structures necessary for monitoring information related to Information Security;
- define technical measures to control and restrict access to information and information systems;
- determine the way of classifying the information according to its importance and value;
- describe the necessary actions to protect information during the stages of processing, storage and handling;
- determine the ways of informing and training employees and associates of the firm in the field of Information Security;
- determine how to handle Information Security incidents;
- describe the ways in which the safe operation of the firm is ensured in case of malfunction of information systems or in cases of disasters.

The firm carries out estimates of the risks related to Information Security at regular intervals and takes the necessary steps to address them. It implements a framework for evaluating the effectiveness of information security procedures through which performance indicators are defined, their measurement methodology is described, periodic reports are produced and reviewed by the Firm's Management in order to continuously improve the system. The Information Security System developed is in accordance with the requirements of the international standard ISO 27001:2015 and in full compliance with the Regulation 2016/679 (General Data Protection Regulation - GDPR). The system is inspected annually by external bodies.

The privacy and quality policies implemented by the firm are posted on the website  
<http://www.crowe.gr>.

## 8. Professional liability insurance

The audit firm has concluded an insurance contract for professional liability insurance with a specialized Insurance Company abroad.

This insurance ensures a sufficient reduction of the professional liability risk incurred by the audit firm, which may be related to professional claims against the company that are likely to arise and which may financially burden the company.

## E. Quality Controls Performed

In accordance with Article 33 of L. 4449/2017 (based on Article 29 of Directive 2006/43/EC, as amended by Directive 2014/56/EU), the supervision of the quality control system of CPAs and auditing firms is the Board of Directors of HAASOB. By delegation of par. 13 of Article 33 of L. 4449/2017, the B. of D. of HAASOB, with Regulatory Act No 155/4/19.10.2018 (Government Gazette, Series II, No 5241/23.11.2018), has entrusted the quality control of CPAs and auditing firms that carry out audits to companies not of public interest to the Quality Control Committee established by decision of the Supervisory Board of SOEL.

Consequently, the firm is subject to external quality controls, both by the Hellenic Accounting and Auditing Standards Oversight Board (HAASOB), as it also carries out audits of companies of public interest, and by the Quality Control Committee of SOEL.

In addition, the quality control system for the audit work of our firm and the quality of the audit files of its certified public accountants is subject to the control of the international network of Crowe Global.

In addition to external audits, based on the quality control system provided by our firm, the quality of the audit files of its certified public accountants is systematically checked by the Quality Control Committee.

- **In our firm, the following quality controls have been carried out by the competent State bodies:**
  - (a) In November 2009, the quality control system of the audit work of our firm was evaluated for the first time by the "HAASOB Quality Control Board".
  - (b) In November 2010, according to Decision No ΣΤ'25/24.03.2010 of the Supervisory Board of SOEL, a quality control was carried out on a sample of our firm's audit files by the Quality Control Committee of SOEL.
  - (c) In January 2012 in our branch in Romania, the quality control system of our firm, which has been fully adopted and is implemented by our subsidiary SOL ROM, as well as the audit files of 2008, were audited by the respective HAASOB of Romania. The score awarded to our firm from this audit was excellent (A).
  - (d) In June 2013, the QCB (Quality Control Board) of HAASOB carried out a qualitative audit of work files of audited companies.

- - (e) In January 2016, in accordance with Decision Z'76/21-01-2015 of the Supervisory Board of SOEL, the quality controllers of SOEL carried out a qualitative audit of five audit projects for the year 2014 carried out by our firm.
  - (f) In May 2017, QCB (Quality Control Board) of HAASOB carried out a quality control of six audit documentation files, a review of the implementation of the International Standard on Quality Control (ISQC) No 1 based on interviews of firm managers and review of indicative documents in the above mentioned files, as well as other files additionally selected for review of audit files. Relevant reports of findings were sent by the Quality Control Board in 2018. The firm, as well as the competent CPAs, sent reply letters on the quality control findings. Subsequently, the final reports of findings on the above audits and inspections as well as on the implementation of the International Standard on Quality Control (ISQC 1) were sent by HAASOB. The firm took into account the comments - recommendations of the quality controllers and adapted to the proposals to address the weaknesses identified, in order to maintain and increase the high level of control and the reliability of the quality control system of our firm.
  - (g) In October 2019, the Quality Control Committee of SOEL carried out a quality control on a sample of four company audit files as well as a sample of 60 files on the adequacy of the measures and procedures adopted by our firm regarding the prevention and suppression of money laundering and terrorist financing in accordance with L. 4557/2018. A draft report on the findings of the above quality control has been sent to the company, which also included the relevant additional explanations. The remaining findings are expected in 2020.

The firm takes into account the observations - recommendations of external quality controllers in order to maintain and increase the high level of control and the reliability of the quality control system of Crowe.

Based on the findings, all appropriate measures are taken and adjustments are made, depending on the weaknesses proposed by the quality control.

Also, special seminars are offered to CPAs, where the findings are reported and the measures to eliminate any weaknesses - comments that are highlighted by the quality controls are discussed.

- **In addition to the above, as provided for by the quality control laws, the quality control system of the audit work of our firm and the files of its certified public accountants, had been audited by the quality controllers of Crowe Global:**

- (a) On 17 - 18 March 2015, an inspection of the quality control of our firm was carried out by the Head of Accounting and Auditing of Crowe.

The inspection involved:

- the actions of our firm to address the issues identified by the respective HAASOB's inspection in 2010;
- the new quality assurance system of our firm and its compliance with ISQC 1;
- the reports on the quality control conducted in 2014 and 2015 for the fiscal year 2013;
- the inspection of 3 audit files, one of which concerned an entity of public interest.

In his report, the inspector expressed his satisfaction with the commitment and focus of our firm in quality and its progress in improving and implementing audit policies and procedures;

(b) On 14 - 19 January 2019, an inspection of the quality control of our firm was carried out again by the Head of Accounting and Auditing of Crowe.

The inspection involved:

- the actions of our firm to address the issues identified by the respective HAASOB's inspection in February 2018;
- the actions of our firm to address the issues arising from the previous Crowe inspection in March 2015;
- the planned actions of management for the update - improvement of the Internal Quality Control System of our firm;
- the reports of quality controls carried out in 2018;
- the quality control policies and procedures adopted by our firm for the management and conduct of the audit work, from the previous inspection of Crowe (March 2015), in accordance with the developments in the regulatory environment in Greece and the European Union;
- the implementation of the Internal Quality Control System of our firm;
- the update for the new electronic documentation program for audits of small and medium-sized entities;
- the inspection of 2 audit files, one of which concerned an entity of public interest.

The general conclusion of the above inspection was that our firm continues to make great progress in improving its policies and procedures as well as the quality of the audit work. On the basis of the recommendations from this review, corrections-interventions were made in the quality control system of our firm, while the findings from the inspection of the audit files were presented to the audit staff in the framework of training seminars in January 2020.

- **In addition to the above external audits, the Quality Control Committee of our firm, systematically carries out the inspections of files provided for by the Internal Quality Control System of our firm.**

In particular, for the assignments of audits of undertakings of public interest, an inspection is carried out by the Quality Control Committee of our firm prior to the issuance of the hot review report.

For each audit project, for which an inspection is carried out by the Quality Control Committee of our firm, a relevant report is prepared, which assigns an evaluation-score to the project.

In addition to the inspection of audit projects, the implementation and operation of the individual procedures and policies of the quality control system of our firm is also reviewed on an annual basis.

For us it is essential to continuously improve the quality of its audits. Understanding the causes that lead to poor performance of the audits is crucial in order to plan effective actions to remedy the weaknesses. In order to ensure the quality of its audits, an appropriate action plan is prepared with a view to ensure both effective implementation and monitoring of the implementation of key procedures and policies ensuring high-level audit work.

In conclusion, we wish to note that the quality controls carried out found that the audit work was sufficient, and all the comments were taken into consideration by the Board of Directors of our firm, so that the firm can adapt to the recommendations of the audit bodies.

#### **Declaration on the adequacy of the operation of the internal quality control system**

In the opinion of the Board of Directors of our firm, the internal quality control system is effective and allows us to identify early any areas that may need improvement. The ultimate goal of the Board of Directors of our firm is to continuously improve the way the firm operates and to leverage any weaknesses identified, both by internal and external quality controls, in order to strengthen the quality control system.

The Board of Directors of our firm takes all steps to adapt to the recommendations to address any weaknesses and inform all auditors by conducting dedicated seminars.

## F. List of Public Interest Entities

The public interest entities in which Crowe carried out statutory audits for the financial year 2019, are as follows:

### 1. Listed on the Athens Stock Exchange companies audited in 2019 by Crowe

S/N	COMPANY NAME
1.	ALPHA TRUST-ANDROMEDA Investment Trust S.A.
2.	FLEXOPACK S.A.
3.	INTRACOM HOLDINGS S.A.
4.	INTRAKAT S.A.
5.	INTRALOT S.A.
6.	MEVACO S.A.
7.	PASAL DEVELOPMENT S.A.
8.	PROFILE S.A. SOFTWARE
9.	SATO S.A.
10.	ADMIE HOLDING S.A.
11.	FIERATEX S.A.
12.	ANEK LINES S.A.
13.	VARVARESOS S.A.
14.	G. E. DIMITRIOU S.A.
15.	NEWSPHONE HELLAS S.A.
16.	ELASTRON S.A. - STEEL SERVICE CENTERS
17.	ELVE S.A.
18.	ELINOIL HELLENIC PETROLEUM COMPANY S.A.
19.	ELTON S.A.
20.	SELECTED TEXTILES S.A.
21.	WOOL INDUSTRY TRIA ALFA S.A.
22.	ILYDA S.A.
23.	INTERWOOD - XYLEMBORIA S.A.
24.	KRI - KRI MILK INDUSTRY S.A.
25.	KTIMA KOSTAS LAZARIDIS S.A.
26.	FLOUR MILLS C. SARANTOPOULOS S.A.
27.	KIRIACOULIS MEDITERRANEAN CRUISES SHIPPING S.A.
28.	N. LEVENTERIS S.A.
29.	MATHIOS REFRactories S.A.
30.	BITROS HOLDING S.A.
31.	PHILIPPOS NAKAS S.A.
32.	PLASTIKA KRITIS S.A.
33.	B & F S.A.
34.	CNL CAPITAL S.A.

## 2. Banks and Insurance companies audited in 2019 by Crowe

S/N	COMPANY NAME
1	COOPERATIVE BANK OF KARDITSA
2	COOPERATIVE BANK OF CENTRAL MACEDONIA
3	BANK SADERAT IRAN
4	PROCREDIT BANK (BULGARIA) EAD BRANCH
5	PERSONAL INSURANCE S.A.
6	MUTUAL INSURANCE COOPERATIVE OF PROFESSIONAL OWNERS OF PUBLIC USE CARS OF N. GREECE & THESSALI
7	NP INSURANCE S.A.
8	HORIZON INSURANCE COMPANY S.A.
9	PANHELLENIC MUTUAL INSURANCE ORGANISATION OF OWNERS OF PRIVATE AND PUBLIC USE CARS "P.A.S.I.A."
10	MINETTA S.A.

In all of the above undertakings were carried out the provided for in Company law statutory, annual and half-yearly audits of their financial statements and, where appropriate, of their consolidated financial statements and audits on the issue of a tax certificate. As regards the scope of the above audits, they were conducted in accordance with International Standards on Auditing and the applicable legislation providing for the issue of a tax certificate.

## G. Declaration of Paragraph 2g Article 13 Regulation 537/2014/E.U.

The Board of Directors in cooperation with the relevant scientific body, the Risk Management Committee, considers that all the procedures described in the quality assurance system provided for ensuring independence for the audits and reviews carried out by our firm have been effectively implemented. For these procedures, their monitoring - revision of the scope of their implementation, we have referred in detail above.

## H. Obligation Of Continual Education Article 12 L. 4449/2017

In order to maintain the professional license provided for in article 3 of L. 4449/2017, the Board of Directors organises continuous training programmes for auditors in all areas of knowledge, such as IAS, IFRS, GAS, tax computerised control programmes, independence, methodology, ethics regulation, etc.

However, the obligation to continuing education did not arise from the obligation of the law (article 12 of L. 4449/2017), because even before the legislative institutionalisation of continuing education for

our firm, this was a regime. Continuous education and training is the first element in which every audit firm, which respects its customers and looks forward to the continuation of its operation, must invest.

So, at least, in any change in laws, regulations, European directives, etc. which touch the audit profession, directly and in a timely manner, our firm, on its own or in cooperation with the competent services of the network, organises educational and training seminars, for the information and training of its members and the executives of the audited enterprises.

The firm has instilled in it the belief that scientific information and training are not benefits exclusively for its members, but subjects, which must be channelled to fellow economists who serve the financial directorates of the audited companies as well as those organised in our scientific body (the Economic Chamber of Greece).

Thus, technical consultants of Crowe, often both in Athens, and in the region (Thessaloniki, Larissa, Heraklion, etc.), have presented, analysed, interpreted, topics related to auditing-accounting issues, to economists, including the members of the audit firm.

The policy of at least annual training (excluding trainees trained in IESOEL), exclusively for the members of the Audit Firm, is planned by its Management, in cooperation with the competent scientific bodies.

Our firm follows the information and training programme of the network.

Below, we refer in detail to the internal training seminars and trainings, which took place at home and abroad in the year 2019.

### **Seminars - Meetings abroad**

- Crowe Global - Technical & General information Europe, Middle East and Africa (EMEA) Meeting - Rome - September 2019
- Crowe Global - Global Annual Meeting - Sydney - October 2019

### **Seminars in house**

Table of seminars organised by the Audit Firm:

<b>SEMINAR TITLE</b>	<b>DATE</b>		<b>DURATION</b> hours	<b>LOCATION</b>
	<b>from</b>	<b>to</b>		
New Legislative Framework L. 4548/2018	16/2/2019	16/2/2019	8	THESSALONIKI
Money Laundering (L. 4557/2018)	27/2/2019	27/2/2019	3	ATHENS
Current Economic issues of accounting auditing interest in English	1/3/2019	2/3/2019	16	THESSALONIKI
Changes in IFRS 9	12/3/2010	12/3/2010	8	ATHENS
Changes in IFRS 9	14/3/2019	14/3/2019	8	ATHENS
Changes in IFRS 9	27/3/2019	27/3/2019	8	THESSALONIKI

SEMINAR TITLE	DATE		DURATION hours	LOCATION
	from	to		
Changes in public limited liability company law (former L. 2190/1920) based on L. 4548/2018	15/4/2019	15/4/2019	8	ATHENS
Changes in public limited liability company law (former L. 2190/1920) based on L. 4548/2018	16/4/2019	16/4/2019	8	ATHENS
Changes in public limited liability company law (former L. 2190/1920) based on L. 4548/2018	18/4/2019	18/4/2019	8	ATHENS
Changes in public limited liability company law (former L. 2190/1920) based on L. 4548/2018	19/4/2019	19/4/2019	8	ATHENS
Changes in public limited liability company law (former L. 2190/1920) based on L. 4548/2018	8/5/2019	8/5/2019	8	CRETE
Changes in public limited liability company law (former L. 2190/1920) based on L. 4548/2018	16/5/2019	16/5/2019	8	ATHENS
Changes in public limited liability company law (former L. 2190/1920) based on L. 4548/2018	17/5/2019	17/5/2019	8	ATHENS
Changes in public limited liability company law (former L. 2190/1920) based on L. 4548/2018	20/5/2019	20/5/2019	8	THESSALONIKI
Changes in public limited liability company law (former L. 2190/1920) based on L. 4548/2018	22/5/2019	22/5/2019	8	ATHENS
Management and Implementation of Programmes and Projects	12/11/2019	12/11/2019	4	ATHENS
Management and Implementation of Programmes and Projects	14/11/2019	14/11/2019	4	ATHENS
Management and Implementation of Programmes and Projects	19/11/2019	19/11/2019	4	ATHENS
Management and Implementation of Programmes and Projects	21/11/2019	21/11/2019	4	ATHENS
International Financial Reporting Standards and Amendments thereon (IFRS 9 - IFRS 15 and IFRS 16)	2/12/2019	3/12/2019	16	THESSALONIKI
International Financial Reporting Standards and Amendments thereon (IFRS 9 - IFRS 15 and IFRS 16)	11/12/2019	12/12/2019	16	ATHENS
Audit documentation on the Consolidated Financial Statements	20/11/2019	20/11/2019	6	THESSALONIKI
Audit documentation on the Consolidated Financial Statements	4/12/2019	4/12/2019	6	ATHENS
Audit documentation on the Consolidated Financial Statements	5/12/2019	5/12/2019	6	ATHENS
Specific issues L. 4548/2018 (Share capital increase, remuneration policy, etc.)	18/11/2019	18/11/2019	8	ATHENS
Specific issues L. 4548/2018 (Share capital increase, remuneration policy, etc.)	22/11/2019	22/11/2019	8	ATHENS
Specific issues L. 4548/2018 (Share capital increase, remuneration policy, etc.)	27/11/2019	27/11/2019	8	THESSALONIKI
Specific issues L. 4548/2018 (Share capital increase, remuneration policy, etc.)	2/12/2019	2/12/2019	8	ATHENS
Specific issues L. 4548/2018 (Share capital increase, remuneration policy, etc.)	3/12/2019	3/12/2019	8	ATHENS
Sampling on statutory and tax audit	6/12/2019	6/12/2019	8	ATHENS
Sampling on statutory and tax audit	9/12/2019	9/12/2019	8	ATHENS
Sampling on statutory and tax audit	13/12/2019	13/12/2019	8	ATHENS
Sampling on statutory and tax audit	16/12/2019	16/12/2019	8	ATHENS
Sampling on statutory and tax audit	20/12/2019	20/12/2019	8	ATHENS

SEMINAR TITLE	DATE		DURATION hours	LOCATION
	from	to		
Sample Acceptable Misstatements (SAM)	28/11/2019	28/11/2019	8	ATHENS
Sample Acceptable Misstatements (SAM)	29/11/2019	29/11/2019	8	ATHENS
Sample Acceptable Misstatements (SAM)	17/12/2019	17/12/2019	8	ATHENS
Sample Acceptable Misstatements (SAM)	18/12/2019	18/12/2019	8	ATHENS
Sample Acceptable Misstatements (SAM)	19/12/2019	19/12/2019	8	ATHENS

The details of the training are kept in the individual file of employees/members of the firm by the Human Resources Directorate.

Our members have also attended SOEL training seminars included in the CPA Continuing Education Programme, as well as in other educational organisations recognized by the SOEL Education Committee.

## I. Financial Data on the Firm's Financial Position

The Turnover analysis per income category is as follows:

S/N	INCOME CATEGORY (Amounts in Euro)	2019	2018
1	Income from Statutory audit of Annual Separate and Consolidated Financial Statements of Public interest entities and entities belonging to a Group of Companies where the parent company is a public interest entity	2.016.858,76	2.378.766,87
2	Income from Statutory audit of Annual Separate and Consolidated Financial Statements of other entities	17.071.020,55	16.476.193,14
3	Income from permitted non-audit services provided to entities audited by the Statutory Auditor or Audit Firm	11.187.947,93	11.162.615,98
4	Income from non-audit services provided to other entities	2.864.837,67	3.264.313,60
		<b>33.140.664,91</b>	<b>33.281.889,59</b>

This Transparency Report is accurate and complete vis-à-vis its content.

Athens, 27 April 2020

**EFSTRATIOS G. PAPARIDIS**

Chairman of the B. of D.



## Start The Conversation:

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## About Us

Crowe Greece is a leading audit firm in Greece and it ranks amongst the top national firms of Certified Auditors Accountants of Europe. With more than 25 years of operation, Crowe Greece is the largest firm of Certified Public Accountants in Greece. Its business activity is both domestic and international and it provides services to more than 4.000 enterprises of the private and public Sector.

The 340 or so Certified Auditors Accountants of Crowe Greece account for more than 36% of the country's entire industry, while it employs 25% of all-grades of auditors registered in the public registry of the Institute of Certified Public Accountants Auditors (SOEL). Crowe Greece has the largest network of branches and associates in Greece and since 2006 is a member of Crowe Global, the 10th largest international audit and advisory network globally.