



NATIONAL TRANSPARENCY AUTHORITY

ETHICS COMMITTEE OF ARTICLE 74 OF LAW 4622/2019

DECISION 20/2025

The Ethics Committee of Article 74 of Law 4622/2019 met in session on April 24, 2025, Thursday at 11:00 a.m., following the invitation of its Chairman to its members dated April 15, 2025, which was sent by email along with the agenda. The meeting was held by teleconference and was attended by the following members of the Committee: Paraskevas Nomikos, Chairman of the NTA Management Board (Chairman), Periklis Aggelou, Legal Adviser to the State (substitute member, who took part due to the absence of Konstantinos Georgakis, regular member), Nikolaos Karagiorgis, Legal Adviser to the State (regular member), Dionysios Laskaratos, First Vice-President of the Supreme Council for Civil Personnel Selection (regular member) and Andreas Pottakis, Ombudsman (regular member). Secretarial support was provided by Eleni Magafa, a secondary education category employee with grade A, of the General Directorate of Financial and Administrative Services and e-Governance, of the National Transparency Authority.

The purpose of the above meeting was the discussion of the application with incoming protocol number, submitted by Ms., Lawyer of the Bar Association, with registration number, acting as attorney-at-law for Mr., former Deputy Minister of Foreign Affairs, referring to the professional/business activities of her client and, in particular, to the establishment by him of a private capital company through which he intends to provide consulting services on issues of financial management and development abroad, exclusively to private companies operating solely in the private sector, i.e. they do not participate in public tenders and do not transact with the State in the context of their commercial/professional activities, requests the following, as stated in the above application:

"a) Please confirm that no permission is required under Article 73 of Law 4622/2029, given



that the business activity he intends to carry out is not related to the activity of the Ministry of Foreign Affairs and the bodies supervised by it in which he served as a Deputy Minister for the period from July 2019 to January 2023, nor can it create a conflict of interest situation within the meaning of Article 71 of Law 4622/2019.

b) Give your consent to my engaging in this activity alongside my duties as an unpaid special advisor to the Prime Minister.

I. Regarding the first part of the request concerning the application of Article 73 of Law 4622/2019.

Article 73 of Law 4622/2019 stipulates, inter alia, that persons appointed to the positions referred to in Article 68 of the same law, namely (a) members of the Government and Deputy Ministers, (b) the General and Special Secretaries, as well as Coordinators of the Decentralized Administrations, (c) the Presidents or heads of Independent Authorities and the Presidents, Vice-Presidents, Governors, Interim Governors, Sub-Governors, managing or executive directors of legal entities of public law (L.E.P.L.) and private law (L.E.Pr.L.), whose selection is at the discretion of the Government, with the exception of bodies falling within the scope of Chapter B of Law 3429/2005 (A' 314), are required, for one (1) year after leaving their position, for any reason, to obtain permission for any professional or business activity related to the activity of the body to which they were appointed, if this could create a conflict of interest situation, within the meaning of Article 71 of Law 4622/2019.

As defined in Article 71(par2, section 2 and 3) of Law 4622/2019: A conflict of interest is any situation in which the impartial performance of the duties of the persons being audited is objectively affected. The impartial performance of duties is affected in particular when there is: (a) a financial or non-financial benefit for themselves, their spouses or cohabiting partners within the meaning of Article 1 of Law 4356/2015, their relatives by blood or marriage, in a direct line without limitation, or in a collateral line, up to the second degree, as well as for natural or legal persons with whom they have a special bond or relationship, and (b) damage, financial or otherwise, to natural or legal persons with whom there is a particular enmity.

As defined in the second subparagraph of paragraph 1 of Article 73 of Law 4622/2019: Such a situation arises in particular: (a) through the provision by them of services - under any legal relationship - to a natural or legal person of private law in Greece or abroad; or (b) through their participation in the capital or management of the above legal entities,



except in cases of acquisition of shares, corporate shares or other rights through inheritance.

The above persons who intend to engage in an activity that may fall within the scope of paragraph 1 of Article 73 of Law 4622/2019 must submit a relevant application to the Ethics Committee referred to in Article 74 of the same law. The Committee, after considering the application of the person, shall issue a reasoned decision within an exclusive period of one (1) month. During this period, the person must refrain from engaging in the activity to which the application relates. If the Committee does not decide within the specified time limit, the permission shall be deemed to have been granted. The Committee, which, pursuant to Article 73 (par 3, fourth subparagraph), section d) of Law 4622/2019, may request from the applicant any additional information it deems necessary for its decision, may by its decision taken at its discretion, pursuant to Article 73(par4) of Law 4622/2019, which shall be published on the website of the National Transparency Authority: (a) allow the activity in question without restrictions or conditions, (b) allow it with the necessary restrictions and conditions, (c) prohibit it completely. Cases (b) and (c) may not exceed a time limit of one (1) year after the person has left the position referred to in Article 68 of Law 4622/2019 for any reason. In the cases referred to in points (b) and (c), the Commission may determine a reasonable compensation for the person concerned, that is borne by the State Budget.

Articles 68 and 73 of Law 4622/2019 do not introduce an absolute prohibition on the exercise of professional activities in the private sector by any of the persons referred to in Article 68 (par1) of the same law, after the expiry of their term of office in the public body in which they served, and whether or not they are permitted to engage in such activity within one (1) year after the expiry of their term of office, is left to the discretion of the Ethics Committee. The Committee, in order to decide, in accordance with Article 73 (par4) of Law 4622/2019, at its discretion, whether to grant the requested permission with or without restrictions or whether to prohibit the exercise of the activity in question, must first examine whether the professional activity which the applicant wishes to pursue is related in general, to the subject matter of the body in which he served and, subsequently, whether the duties he is to perform in his professional activity in the private sector, are related to the whole range of his responsibilities in the body in which he was employed. The above investigation of any relevance is also important in order to determine the content of any necessary restrictions on his professional activity after the end of his term of office.

Moreover, the role of the Committee should not, by imposing strict restrictions on the free professional activity of the persons referred to in Article 68 (par1) of Law 4622/2019,



ultimately discourage capable and specialized executives from taking up positions in public bodies. Furthermore, anyone who has taken up a position of responsibility in a public body has been selected by the Government because of the relevance of their expertise to the subject matter of the position in question, in order to contribute to the progress of the public body's work. This expertise may secure them a position in another body after the end of their term in the public body, and therefore the slightest relevance between the competence of the body from which a person under supervision comes and the field in which he or she will be employed should not, in itself, lead to an absolute prohibition on taking up a new position.

The application under consideration, as regards the first part thereof, is admissible as it has the required legal form of an application under Article 73 (par 1 and 2) of Law 4622/2019, given that its content is specific as to the professional activity intended to be pursued by Mr.through the establishment of a private capital company. Furthermore, it has been submitted by the authorized lawyer of the obliged person, as Mr.has served as Deputy Minister of Foreign Affairs and, therefore, has the capacity provided for in Article 68 (par1 section a) of Law 4622/2019. As specifically stated in the above application, Mr....., as Deputy Minister of Foreign Affairs, he was responsible for the General Secretariat for International Economic Relations and Outward orientation of the Ministry of Foreign Affairs.

In addition, the applicant must submit the above application to the Ethics Committee pursuant to the provisions of Article 73(par1) 2 of Law 4622/2019 on the basis of the aforementioned capacity, which was initially acquired in 2019 pursuant to Presidential Decree No. 83/2019 (Government Gazette A 121/09.07.2029) Presidential Decree, then pursuant to Presidential Decree No. 79/2023 (Government Gazette A 131/27.06.2023) and lost it in January 2025, following the acceptance of his resignation, pursuant to Presidential Decree No. 2/2025 (Government Gazette A' 5/17.01.2025). Therefore, one (1) year has not elapsed since his departure from the above position.

As regards the further examination of the application of Article 73(par1) of Law 4622/2019, it must first be examined whether the professional activity described in the application, namely the provision, through the private capital company it has set up, consultancy services on issues of financial management and development abroad, exclusively to private companies operating solely in the private sector, i.e. not participating in public tenders and not transacting in the context of their commercial/professional activity with the State, relates to the competences of the General Secretariat for International Economic Relations



and Outward orientation of the Ministry of Foreign Affairs and, secondly, whether it could create a conflict of interest within the meaning of Article 71(2) and (3) of Law 4622/2019.

In view of the above, it should be investigated in particular whether there is a connection between the activities of the General Secretariat for International Economic Relations and Outward orientation of the Ministry of Foreign Affairs and the bodies under its supervision, with the above-mentioned professional/business activity that the applicant wishes to pursue. Therefore, the responsibilities of the General Secretariat for International Economic Relations and Outward orientation and the bodies under its supervision, which relate to the support of private companies operating abroad, are set out below.

The General Secretariat for International Economic Relations and Outward orientation was established within the Ministry of Foreign Affairs by Presidential Decree 84/2019 (Government Gazette A' 123) and operates in accordance with the provisions of Articles 159-198 of Law 4781/2021 (Government Gazette A' 31/28.02.2021)

"Organisation and operation of the Ministry of Foreign Affairs, Council of Hellenes Abroad, regulation of international development cooperation and humanitarian aid issues and other provisions".

Article 159 of the above law stipulates that the mission of the General Secretariat for International Economic Relations and Openness includes:

"... responsibility for drawing up the National Strategic Plan for Outward orientation and coordinating the actions of ministries and state and private bodies to strengthen Outward orientation, coordinating all actions to implement the architecture of the country's international image (national brand), as well as monitoring, coordinating, and implementing the development of the management of Greek product and service names (national brand and image - branding) abroad, by drawing up and implementing an application and dissemination plan in the public administration and the public sector, subject to Article 75 of Law 4761/2020 (A' 248), the coordination of the services of the ministries on issues relating to the planning and implementation of Outward orientation, international communication and promotion actions of themselves and their supervised bodies, in order to ensure harmonization with the National Strategic Plan for Outward orientation, contributing to the formulation of government policy on the Outward orientation of the Greek economy, supervising, coordinating, and monitoring the implementation of operational plans for foreign trade and investments abroad, which are drawn up by supervised bodies, coordinating the services of ministries and bodies on



matters relating to the design, planning, implementation, review, and updating of Outward orientation actions, monitoring, studying, and making recommendations for the resolution of any issue falling within the remit of the General Secretariat and, in general, promoting, strengthening, and defending Greek economic and commercial interests abroad.

The General Secretariat for International Economic Relations and Outward orientation includes the Second General Directorate for International Economic Relations, which, according to Article 163(sections b, f, i, k and l of Law 4781/2021, is responsible for the following matters relating, in general, to issues of economic management and development of private companies abroad:

- a) strengthening the country's economic and commercial position and creating the right conditions to make it easier for Greek companies to do business abroad and attract foreign investment.
 - b) preparing and negotiating, in cooperation with the competent ministries, services, and bodies, bilateral economic agreements and arrangements relating, in particular, to fisheries, development, industry, agriculture, trade, energy, investment, research, e-government, shipping, transport, manufacturing, the environment, banking, and finance;
 - c) coordinating the Economic and Commercial Affairs Offices¹ in the exercise of their duties to promote the country's international economic relations and evaluate them,
 - d) coordinating and monitoring the Outward orientation agencies supervised by the Ministry of Foreign Affairs;
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- e) cooperating with other ministries on actions to strengthen Outward orientation of Greek businesses attracting and promoting investments,

¹ **O.E.Y. Offices (Offices of Economic and Commercial Affairs)**



to ensure alignment with the principles of the Strategic and Operational Plan for Outward orientation.

The Second General Directorate for International Economic Relations, in accordance with Article 164 of Law 4781/2021, comprises seven (7) Directorates, of which the following have responsibilities relating to the promotion of the interests of private companies abroad:

a) The B1 Directorate for Outward orientation Planning and Coordination of Outward orientation Bodies (Article 165(b), (c), (d), and (f) of Law 4781/2021) is responsible for:

(b) formulating proposals for improving the institutional framework for Outward orientation and promoting international business cooperation;

c) monitoring the implementation of actions by the Foreign Affairs Authorities and the O.E.Y. Offices, and the supervised bodies of the Ministry of Foreign Affairs and the services of other ministries and their supervised bodies, related to the principles and objectives of the Strategic and Operational Plan for Outward orientation, and promoting the national brand and image of Greek products abroad,

d) monitoring and recording aid in the field of Outward orientation,

e) coordinating and monitoring Outward orientation bodies supervised by the Ministry of Foreign Affairs.

It should be noted that Department I for the Promotion of Outward orientation, of the above Directorate, is responsible (in accordance with Article 167(a), (c), (d), (e) and (g) of Law 4781/2021) specifically for:

a) informing the country's professional and chamber bodies about the Annual Plans and the progress of economic diplomacy actions within the framework of the Ministry of Foreign Affairs' Strategic and Operational Plan for Outward orientation, recording the activities of businesses and the problems they encounter in foreign markets and supporting them, in cooperation with the diplomatic and consular authorities, the O.E.Y. Offices and the Hellenic Investment and Foreign Trade Agency (Enterprise Greece),

c) recording, in cooperation with business organizations, the priorities of businesses and the problems they face in foreign markets and supporting them, in cooperation with the diplomatic and consular authorities, the O.E.Y. Offices and the "Hellenic Investment and Foreign Trade Company P.L.C."



d) cooperation with national or international, public or private bodies for monitoring aid for Outward orientation, with a view to informing and facilitating the participation of public bodies, professional bodies and Greek enterprises in European and international funding programs, in cooperation with the Hellenic Investment and Foreign Trade Agency, in areas related to the promotion of exports and the strengthening of Greek entrepreneurship internationally.

e) monitoring and participating in the actions of public or private business entities aimed at strengthening Greek exports of products and services and supporting Greek business activities, in cooperation with the Hellenic Investment and Foreign Trade P.L.C.

g) monitoring issues relating to the protection of Greek trademarks, Protected Designations and Geographical Indications abroad, coordinating with the relevant ministries and bodies, providing assistance to them and coordinating with the O.E.Y. Offices, in order to monitor the implementation of product promotion actions within the framework of EU promotion programs in the European Union and in third countries.

Department II for the Coordination of Outward orientation Bodies, of the above Directorate, is responsible (in accordance with Article 168(a), (c) and (e) of Law 4781/2021) specifically for:

a) monitoring and coordinating the outward orientation bodies supervised by the Ministry of Foreign Affairs and, in particular, the Export Credit Insurance Organization (ECIO.) and the "Hellenic Investment and Foreign Trade Company P.L.C." (Enterprise Greece),

b) cooperating with the "Hellenic Investment and Foreign Trade P.L.C." and coordinating with the Foreign Authorities for the organization of business missions accompanying the President of the Republic, the Prime Minister or Ministers during their official visits abroad, as well as coordinating the diplomatic and consular authorities and the Offices of Economic and Commercial Affairs for the implementation of business missions and events organized by "Hellenic Investment and Foreign Trade P.L.C." and other public or private business entities,

c) monitoring short-term and medium- to long-term export credit insurance issues handled by the Export Credit Insurance Organization (ECIO) and, in particular, monitoring medium-term export credits granted by Greece to third countries in the form of "revolving credit facilities," through cooperation with the banks granting the above credits and the Export Credit Insurance Agency (ECIO.) guaranteeing them,



The following Directorates are also part of the General Directorate for International Economic Relations:

- a) Directorate B3 for Bilateral Economic Relations with European countries and countries in North, Central, and South America and the Caribbean.
- b) The B4 Directorate for Bilateral Economic Relations with countries of Southeast Europe, Russia, Belarus, the Caucasus and the Black Sea region, as well as OSCE issues.
- c) Directorate B5: Bilateral Economic Relations with Middle Eastern and Gulf countries, North Africa and Sub-Saharan Africa, Asia and Oceania.
- (d) DG B6 Multilateral Economic Relations and Trade Policy.
- e) B7 Directorate for International and Regional Energy and Transport Networks and Supply Chains.

The above Directorates B3, B4, and B5 share the responsibility of monitoring and promoting the country's bilateral economic and trade relations of the country, in cooperation with the respective embassy and consular authorities and the O.E.Y. Offices and other public and private sector services and bodies with a relevant remit, and to study and submit proposals with a view to developing bilateral economic and trade relations with the countries for which the Directorates are responsible.

In addition, Article 160 of Law 4781/2021 specifies the bodies under the supervision of the General Secretariat for Economic Relations and Outward orientation, which are responsible for assisting in the implementation of its work, namely:

- a) the Hellenic Investment and Foreign Trade Agency (Enterprise Greece), and
 - b) The Export Credit Insurance Organization (ECIO).
- A) The company under the name "Hellenic Investment and Foreign Trade P.L.C.," as established by Article 1 of Law 2372/1996² (A` 29) and renamed as above by Article 1 of Law 4242/2014 (A` 50), was given the distinctive title "Enterprise Greece" by Article 84(1) of Law 4635/2019. As defined in paragraph 2 of Article 1 of Law 2372/1996, as replaced by paragraph 2 of Article 84 of Law 4635/2019, the company operates in the public interest, in accordance with the rules of the private economy, and is supervised by the Minister responsible for International Economic Relations and Outward orientation.

² LAW No. 2372/Government Gazette A' 29/1996. Establishment of bodies to accelerate the development process and other provisions



The purpose of the company, as defined in Article 1 of its Articles of Association, as approved by paragraph 3 of Article 1 of Law 2372/1996, as replaced by paragraph 3 of Article 84 of Law 4635/2019, is:

"...to attract, welcome, promote, support, and maintain investments in Greece, contribute to the continuous improvement of their institutional framework, support international investment cooperation, the promotion of the country as an investment destination through the development of institutional cooperation with international bodies, the promotion and development of all types of exports of goods and services within the framework of the "National Strategic Plan for Outward orientation," the provision of information on outward-looking entrepreneurship and the provision of information, advisory assistance, and any other support services to Greek enterprises with a view to facilitating business contacts and supporting Greek exports and Greek entrepreneurship in international markets.

To achieve the above objective, the Company:

- a. Contributes to the preparation of the "National Strategic Plan for Outward orientation" and the action plan of the country's international image (national brand), providing the necessary information and proposals to the Strategic Planning Service of the General Secretariat for International Economic Relations and Outward orientation of the Ministry of Foreign Affairs.
- b. It supports Greek investments in foreign markets, the development of international trade, and implements export support techniques through cooperation and participation in joint actions. It organizes, as an official state body, or commissions and supervises the organisation of national participation in international exhibitions abroad.
- c.....
- d. It undertakes the monitoring, study, preparation, and submission of studies, proposals, measures, programs, and actions for the promotion, strengthening, and support of exports, the improvement of competitiveness, the removal of obstacles to exports, and the attraction of investments.
- e. Organizes comprehensive product promotion and marketing programs in cooperation with industry associations and businesses, as well as international marketing activities that include, among other things, invitations to buyers and journalists, and events to promote Greek products.



f. It organizes exploratory activities in selected markets with the aim of informing the export business community about export and investment opportunities and the potential for placing new Greek products and services on the market.

g. Provides general and specialized information services (consultancy services) and guidance to businesses on market, legal framework, standardization and packaging, quality, and commercial contacts. It manages a structure (Export Support Office or "Export Helpdesk") to provide general and specialized information and personalized support, acting as a central point of coordination and interaction with bodies and service providers involved in export promotion and contributing to the exchange of information between the bodies involved, competent services, ministries, and independent authorities. It undertakes to provide specialized consulting services on investment, foreign trade, and development issues to local authorities of the first and second degree and to general government agencies.

h. It provides modern professional training and specialized knowledge and skills to executives of export companies.

i. Cooperates with corresponding organizations abroad and ensures the utilization of EU and international resources, exchanges and adopts good practices.

j. It may establish subsidiaries and special purpose companies. It participates in competitive procedures, where required, as well as in the implementation of actions, projects, and programs at the national, European, and international levels financed by national, EU, or international resources, aimed at improving the business environment, the development and support of entrepreneurship, competitiveness, innovation, and extroverted economic growth, and which are generally related to its objectives.

ja. ...

jb. ...

jc. ...

k. Cooperates with the relevant Directorates of the Ministry of Foreign Affairs and the relevant services in each target country (Embassy, Economic and Commercial Office) for the preparation of specific annual Operational Plans for the promotion of exports, attracting investment and strengthening Greek entrepreneurship in each target country in accordance with the National Strategic Plan for Outward orientation.



(l) Supervises and manages the electronic information management system, which operates as a single national electronic portal for extroverted entrepreneurship (AgoraPlus), determines its structure and content, updates and checks the information provided, in liaison with the Ministry of Foreign Affairs, whose services are responsible for providing information. To this end, it cooperates with relevant services and bodies, ministries, and independent authorities. During the design and implementation of the single national electronic portal, it ensures its interoperability, in cooperation with the Ministry of Digital Governance, in accordance with Article 47 of Law 4623/2019 (A` 134).

It cooperates with the competent services and bodies in relation to European and international financial assistance programs for third countries in areas related to the promotion of exports and the strengthening of Greek entrepreneurship internationally, as well as for the preparation of studies aimed at strengthening Greek exports of products and services and supporting Greek business activities and cooperation.

m. It monitors Greek entrepreneurship abroad and records its priorities and problems and takes measures to promote, strengthen, and support it by sector, industry, and market, and in cooperation with the competent services, diplomatic and consular authorities, the Offices of Economic and Commercial Affairs, and provides information, advisory assistance, and any other support services to them with a view to facilitating business contacts and supporting Greek entrepreneurship in international markets.

(18) Organizes business missions which accompany the President of the Republic, the Prime Minister or members of the Government during their official visits abroad, in cooperation with the competent services and the Foreign Authorities.

o. Cooperates with the competent services of the Ministry of Foreign Affairs to coordinate with foreign authorities and economic and commercial offices for implementation of all types of business missions and events that organizes.

p. Supports investors and Greek export-oriented companies in utilizing domestic and foreign recognized sources of financing or other financial instruments, utilizing its international network of contacts.

B) The Export Credit Insurance Organization (ECIO.) established by Law 1796/1988³ (A` 152), by Article 1 of Law 4918/2022⁴ was converted into a public limited company under the name "Hellenic Export Credit Agency S.A." and the distinctive titles "Export Credit Agency L.P.C." and "Export Credit Greece." Article 2 of the above law ratified the Articles



of Association of the Company, whose purpose, according to Article 4, paragraphs 1, 2, 5, and 6 of its Articles of Association, is defined as follows:

Article 4

"Purpose of the Company

1. The purpose of the Company is to provide insurance, reinsurance, co-insurance, as well as guarantees and counter-guarantees for political, economic and commercial risks, as well as for any other related risks, which are connected with export and investment activities and the international activities in general of Greek companies, as well as their subsidiaries or affiliated companies, including subsidiaries or affiliated foreign companies. The Company aims to offer financial instruments for the development of Greek export activity and the internationalization of the Greek economy. The Company operates in accordance with national and EU law and international agreements governing export credit agencies or companies.

³ Law 1796 of 7/11.7.88. Establishment of the Export Credit Insurance Organization (ECIO.) and other provisions. (A' 152).

⁴ LAW No. 4918 (Government Gazette A' 68/31.03.2022) Conversion of the Export Credit Insurance Organization (O.A.E.P.) into a public limited company under the name "Hellenic Export Credit Agency" and ratification of its Articles of Association and other provisions



2.The Company's activities cover the insurance, guarantee and financing of short-term, medium-term and long-term export credits and all kinds of transactions related to the export activity and internationalization of Greek companies, their subsidiaries, or affiliated companies.

5. Furthermore, the Company aims to: a) facilitate access to sources of financing for exporting companies, b) provide consulting services and professional training to exporting companies and the public sector, and c) promote the country's export policy.

6. In order to achieve its purpose, the Company may cooperate and enter into contracts with financial and credit institutions based in Greece or abroad, as well as with corresponding export credit agencies of other countries for the entire range of its activities. In addition, it may enter into agreements with providers of reinsurance, commercial information, and brokerage services. It may also cooperate with business and export organizations, chambers of commerce, and local government bodies, as well as with the competent services and bodies responsible for European and international financial assistance programs to third countries in the areas of export promotion and the strengthening of Greek entrepreneurship internationally.

The company was established by the applicant on, with Tax Identification Number and General Electronic Registration Number.....in accordance with the provisions of Law 4072/2012⁵.

In accordance with Article ... of...its articles of Association, the purpose of the company is:
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The company, as stated in the Company Establishment Notice-Certificate registered with the General Commercial Registry (G.E.M.I.), operates under the main Activity Code Number:

⁵ LAW No. 4072 (Government Gazette A 86 11.4.2012) Improvement of the business environment - New company form - Trademarks - Real Estate Agents - Regulation of shipping, port and fisheries matters and other provisions (Articles 43 et seq.).



.....
and has the following Secondary Activity Codes:
.....
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.....

In accordance with Article ... of the company's Articles of Association, the management of the company, the administration of its affairs, and its judicial and extrajudicial representation have been entrusted to the applicant for an indefinite period.

It follows from the above that the General Secretariat for International Economic Relations and Outward orientation and the two bodies supervised by it, namely the Hellenic Investment and Foreign Trade L.P.C. (Enterprise Greece), and the Hellenic Export Credit Agency S.A. Export Credit Greece, which were the responsibility of the applicant during his term as Deputy Minister of Foreign Affairs, in view of their aforementioned competences, aim, through multi-level support, advisory, promotional, and/or financial support to Greek companies, their subsidiaries, or affiliated companies, to facilitate and strengthen the presence of Greek companies abroad, to support Greek exports and, in general, Greek entrepreneurship in international markets.

Therefore, to the extent that the above-mentioned business consulting activity that the applicant intends to carry out by establishing the above-mentioned Single-Member Private Capital Company under Law 4072/2012, namely the provision of consulting services on issues of financial management and development abroad, exclusively to private companies, is aimed at Greek companies, their subsidiaries or affiliated companies, including subsidiaries or affiliated foreign companies operating abroad, is related to the competences and activities of the above entities, within the meaning of Article 73(par1) of Law 4622/2019.

As regards the question whether the above-mentioned intended business activity of providing consulting services to the above-mentioned companies on issues of financial management and development abroad, is likely to create a conflict of interest situation within the meaning of Article 71 of Law 4622/2019, the answer must be affirmative, for the following reasons:

a) The single-member private capital company established by the applicant may use the confidential or non-confidential privileged and specialized information, the know-how, and the network of contacts acquired through the activities of the General Secretariat for



International Economic Relations, which was under its responsibility, the Hellenic Investment and Foreign Trade Company P.L.C. (Enterprise Greece), and the Hellenic Export Credit Agency P.L.C. "Export Credit Greece," which are supervised by the aforementioned General Secretariat.

b) Greek companies, their subsidiaries or affiliated companies, including subsidiaries or affiliated foreign companies operating abroad, which request the provision of the above consulting services from his company, are particularly likely, in view of the short time since the applicant left his position as Deputy Minister of Foreign Affairs, to have already been served by the services of the General Secretariat for International Economic Relations, the Hellenic Investment and Foreign Trade Company P.L.C. (Enterprise Greece), and the Hellenic Export Credit Agency S.A. "Export Credit Greece," and could already be known to the applicant.

c) Even if this is not the case, the short period of time since the applicant left his position as Deputy Minister of Foreign Affairs will be particularly beneficial in attracting clients, who will value his recent knowledge and, in all likelihood, acquaintance and cooperation with high-ranking officials of the above services, who are likely to remain in important positions of responsibility and decision-making authority. As a result, the company he established will gain an unfair advantage, distorting fair competition, at the expense of other companies that provide similar consulting services to private companies operating abroad.

d) The companies that will seek its advice are expected to subsequently turn to the following for further multi-level support for their activities abroad to the competent services of the General Secretariat for International Economic Relations and Outward orientation of the Ministry of Foreign Affairs, the Hellenic Investment and Foreign Trade S.A. (Enterprise Greece), and the Hellenic Export Credit Agency S.A. "Export Credit Greece," where they are likely to be served by former or current associates of the applicant, and therefore it would be possible for an issue of undue influence to arise in relation to these persons in the performance of their duties, given the short time that has elapsed since the end of the applicant's term of office as Deputy Minister of Foreign Affairs.

Finally, it should be noted that the applicant's business activity, as described in its application, may affect the confidence of citizens in the institution of public administration and in the persons holding positions under Article 68 of Law 4622/2019, because the above circumstances could give rise to a case of revolving doors.



In view of the above, the Ethics Committee unanimously decides:

- a) Not to grant Mr., former Deputy Minister of Foreign Affairs, the requested permission to engage in professional activities of provision, through his company with the name....., consulting services, with Activity Codes and....., regarding issues of financial management and development abroad, exclusively to private companies operating only in the private sector.
- b) Not to award the applicant a reasonable compensation, as provided for in Article 73(4)(c) of Law 4622/2019, because the purpose of the above provision is for the Ethics Committee to make use of the remedial measure of compensation in cases of exclusion of the applicant from the exercise of his profession in general, resulting in harm to his professional freedom and economic situation and, in general, to his development of his personality. In this case, however, this is not the case, since the prohibition concerns only the above business activity for a period of one year from his departure from the position of Deputy Minister of Foreign Affairs (January 2025-January 2026). Moreover, the applicant may engage in the other business activities provided for in the purpose of his company, which, insofar as they do not concern the provision of consulting services on issues of financial management and development abroad, private companies, do not create a conflict of interest within the meaning of Articles 73 and 71 of Law 4622/2019.

In this context, Mr. Laskaratos expressed the specific opinion that the fact that the companies to which the company established by the applicant will provide services will not engage in activities or transactions with the Greek State has no influence. This is because, according to the provision of Article 73(1) of the applicable law, the mere provision of services by the applicant's company, through any legal relationship, to legal entities in Greece or abroad constitutes a conflict of interest situation.

II. With regard to the request for a favorable opinion on the exercise of the above professional activity, in parallel with the duties undertaken by the applicant, as an unpaid special advisor, in the Special Prime Minister's Office at the General Secretariat of the Prime Minister of the Presidency of the Government, dealing with investment and Outward orientation issues (Government Gazette Y.O.D.D. 130/21-2-2025).

As defined in Article 74 "Ethics Committee" paragraph 1 of Law 4622/2019, as applicable:

"1. An Ethics Committee is established within the National Transparency Authority of Chapter C of this Part, an Ethics Committee with the following powers: (a) to deal with any matter referred to it by the Prime Minister on issues of ethics and the avoidance of



conflicts of interest of persons appointed to the positions referred to in Article 68 hereof; (b) examines requests submitted under paragraphs 1 and 2 of Article 73, (c) may, on its own initiative, monitor the implementation of the provisions of this Chapter and propose the imposition of the penalties provided for in Article 75, (d) shall give its opinion on draft codes of conduct for persons appointed to the positions referred to in Article 68 or for other civil servants or public officials, referred to it by the Prime Minister, and (e) shall examine, on its own initiative or following a report, any breach of the obligations of Article 76 and propose the imposition of the penalties provided for in Article 75.

The above, with the second part of his application under consideration requested the Ethics Committee to give its consent for him to engage in the above professional activity, in parallel with the above duties he had undertaken as an unpaid special advisor, in Special Prime Minister's Office at the General Secretariat of the Prime Minister of the Presidency of the Government.

However, issuing opinions on questions from private individuals does not fall within the powers of the Ethics Committee as defined in Article 74 of Law 4622/2019. The provisions of Articles 68-75 of the above law, and in particular Article 74 thereof, do not provide for the possibility of submitting an independent question of an advisory nature, regarding the scope of application of the provisions of Article 76 of Law 4622/2019 concerning impediments and incompatibilities of appointed officials and special advisors. The Committee only gives opinions on draft codes of conduct for persons appointed to the positions referred to in Article 68 or for other civil servants or public administration officials referred to it by the Prime Minister (Article 74(par1)(iv) of Law 4622/2019). In addition, the Committee shall deal with any matter referred to it by the Prime Minister concerning issues of ethics and the avoidance of conflicts of interest of persons appointed to the positions referred to in Article 68 of Law 4622/2019, which do not include the position of special advisor held by the applicant.

Furthermore, even if the above request were deemed admissible by the Ethics Committee, it would be submitted in vain, because according to the previous unanimous decision of the Committee, the above activity is prohibited and therefore the Committee did not grant a permission for its exercise.



In view of the above, the Ethics Committee unanimously decides:

The request of Mr....., in relation to the above part of the application, for the granting of a favorable opinion for the exercise of the professional activity of provision, through his company with the trade name “... ..” consulting services on issues of financial management and development abroad, exclusively to private companies, in parallel with the duties he assumed as an unpaid special advisor, in the Special Prime Minister’s Office at the General Secretariat of the Prime Minister of the Presidency of the Government, should be rejected as inadmissible.

In this context, Mr. Laskaratos expressed the specific opinion that a conflict of interest arises when the persons referred to in Article 68 of Law No. 4622/2019 carry out the same business or professional activity in foreign or domestic companies and not in the public sector or public bodies.

**The Chairman
of the Ethics Committee**

Paraskevas Nomikos

The Secretary

Eleni Magafa