NATIONAL TRANSPARENCY AUTHORITY

ETHICS COMMITTEE OF ARTICLE 74 OF LAW 4622/2019

DECISION 1/2026

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The Ethics Committee of Article 74 of Law 4622/2019 met in session on Friday, April 24th, 2026, at 10:00 a.m. following the invitation of April 21, 2026, sent by Committee's Chairman to the other regular and alternate members, which was sent by email along the daily agenda. The meeting was held via teleconference and was attended by the following members of the Committee: Paraskevas Nomikos, Chairman of the N.T.A Administrative Council (Chair), Anna Kantzia, Legal Advisor to the State (Regular Member), Nikolaos Karagiorgis, Legal Advisor to the State (Regular Member), Dionysios Laskaratos, First Vice President of Supreme Council of Civil Personnel Selection (Regular Member), and Andreas Pottakis, Ombudsman (Regular Member).

Secretarial support was provided by Eleni Magkafa, a secondary education category employee in the Administrative-Accounting branch 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 to discuss and decide on the application, filed under ref. number …/03-04-2026, submitted by Mr. ……, former Chairman of the Hellenic Telecommunications and Post Commission, by which he requests to be granted a permission, in accordance with Article 73 of Law 4622/2019, to be hired by the newly established company under the name "... ." as Director of Innovation and New Markets, under a permanent employment contract.

Pursuant to Article 73 of Law 4622/2019, it is stipulated, 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 the Coordinators of the Decentralized Administrations, (c) the Presidents or heads of Independent Authorities and the Presidents, Vice Presidents, Governors, Interim Governors, Sub-Governors, managing directors, or executive advisors 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 activities of the body to which they were appointed, since this could create a conflict of interest, within the meaning of Article 71 of Law 4622/2019.

In addition to the above provisions of Law 4622/2019, in this case the question arises as to the application of Law 4070/2012, which is more specific to the Hellenic Telecommunications and Post Commission (EETT) (Government Gazette A' 82/April 10, 2012), specifically Article 6, paragraph 8 thereof, as currently in force, pursuant to which the President, Vice Presidents, and members of EETT are prohibited, for five (5) years following the expiration of their term of office, from providing services under a paid contract or any other legal relationship to a company or business regarding matters

which they themselves handled or in which they participated in decision-making during their term of office. In the event of a violation of this provision, a fine equal to ten times the total remuneration and compensation received by the EETT member shall be imposed by decision of the Minister of Finance and the Minister of Digital Policy, Telecommunications, and Information.

A conflict of laws arises in cases where, in the application of the laws, the same factual circumstances satisfy the requirements of more than one rule of law, or conversely, when the requirements of certain rules of law apply to the same factual circumstances (Decision No. 1/2021 of the Ethics Committee).

In the present case, as evidenced by the documents attached to the application under review, the company named "……." was established on ….., that is, more than one month after the expiration of the applicant's term of office (February 16, 2026), as stated below. Consequently, it is not possible that there were any cases involving the company that the applicant handled or in which he participated in decision-making during his term of office, within the meaning of the provisions of Article 6, paragraph 8, of Law 4070/2012 (Government Gazette A' 82/April 10, 2012), as currently in force.

Consequently, in the present case, there is no issue of a conflict of legal rules that would require resolving the question regarding the applicable rule of law based on the interpretation of the relevant provisions. Moreover, even in the context of interpreting and comparing the content, on the one hand, of the relevant provision of Law No. 4070/2012—which is more specific regarding the Hellenic Telecommunications and Post Commission (EETT), and on the other, Articles 68 and 73 of Law No. 4622/ 2019, it follows that the professional restriction provided for in Article 6 (par. 8) of Law 4070/2012 is so narrowly defined that it prohibits the Chairman, Vice Chairmen, and members of the EETT to provide services to a company or business solely in matters that these individuals had handled or on which they had jointly decided during their term of office. Therefore, in essence, there is no prohibition on providing services in general to companies or businesses, whose activities are related to the activities and, in general, the responsibilities of the body to which the persons referred to in Article 68 of Law 4622/2019 were appointed, even if a conflict of interest could arise in the broad sense and under the specific categories set forth in Article 71 of Law 4622/2019. The provisions of Article 6 (par.8) of Law 4070/2012 establish a very specific and narrowly defined professional restriction, which cannot supersede the much broader professional restrictions applicable to the President of the EETT from the provisions of Articles 68, 71, and 73 of Law 4622/2019, because the provisions of Law 4070/2012 and Law 4622/ 2019 do not address the same factual situation; they do not have the same content; they do not regulate the same factual situation in different ways, but rather establish different legal rules. Consequently, the existence of the aforementioned provision of Law 4070/2012 does not preclude the application of Articles 68 and 73 of Law 4622/2019 but operates in a supplementary manner with respect to them for the period extending beyond one year from the expiration of the applicant's term of office at the EETT and restrictively with respect to the prohibition established. Consequently, the relevant provisions of Law 4622/2019 apply to the application under review.

As provided in Article 71, paragraph 2, second sentence, and paragraph 3 of Law 4622/2019: A conflict of interest constitutes any situation in which, objectively, the impartial performance of the duties of the persons subject to review is affected. The impartial performance of duties is affected in particular when there is: (a) a benefit, financial or otherwise, for themselves, their spouses or domestic partners as defined in Article 1 of Law 4356/2015, their relatives by blood or marriage—in the direct line

without limitation, and in the collateral line up to the second degree, as well as for natural or legal persons with whom they have a special bond or a particular relationship, and (b) harm, financial or otherwise, to natural or legal persons with whom there is particular hostility.

As defined in the second sentence 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, company 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, shall submit a relevant application to the Ethics Committee referred to in Article 74 of the same law. The Committee, after considering the person's application, 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 license shall be deemed to have been granted. The Committee, which, pursuant to Article 73(par.3), fourth subparagraph, of Law 4622/2019, may request from the applicant any additional information it deems necessary for taking a decision, it may, by its decision, taken at its discretion, pursuant to Article 73(par.4) of Law 4622/2019 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 absolutely. 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 cases (b) and (c), the Committee may determine reasonable compensation for the person, that is borne by the State Budget.

Articles 68 and 73 of Law 4622/2019 do not impose an absolute prohibition on the practice of a professional activity in the private sector by any of the persons referred to in Article 68(par.1) of the same law, following the expiration of their term of office at the public body where they served; whether such activity is permitted or not within one (1) year after the expiration of their term of office is left to the discretion of the Ethics Committee. In order to decide, in accordance with Article 73(par.4) of Law 4622/2019, at its discretion, whether to grant the requested permission with or without restrictions or to prohibit the pursuit of the activity under consideration, it must first examine whether the professional activity the applicant wishes to engage in is generally related to the scope of authority of the body where he previously served and, subsequently, whether the duties he is to undertake, in the course of his professional activities in the private sector, are related to the full scope of his responsibilities at the body where he served. This examination of any such relevance is also important in order to determine, in substance, any necessary restrictions on his professional activity following the end of his term of office.

Moreover, the Committee's role must not, by imposing strict restrictions on the free professional activity of the persons referred to in Article 68(par.1) of Law 4622/2019, ultimately act as a deterrent to capable and specialized professionals from taking on positions in public bodies. Moreover, anyone who has assumed a position of responsibility with a fixed term in a public organization has been selected by the Government because their expertise is relevant to the subject matter of that specific position, in order to contribute to the progress of the public body's work. That same expertise may secure him a position at another entity after the term of service at the

public entity ends, and therefore, even the slightest connection between the jurisdiction of the body from which a person subject to review originates and the sector in which that person will be employed should not, without further consideration, lead to an absolute prohibition on accepting a new position.

As stated in the Explanatory Memorandum to Law 4622/2019 regarding Article 73, "A conflict of interest (and, correspondingly, the safeguarding of the public interest) may arise even after the expiration of the term of office of persons appointed to the positions referred to in Article 68 of this Law."

…….

Consequently, paragraph 1 of Article 73 of this draft law defines (by way of example and not exhaustively) the relevant situation of conflict of interest, which may arise even after the expiration of the term of office of the persons in question, as follows: (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, company shares, or other rights through inheritance. The above situations (a) and (b) apply in the case of natural or legal persons associated with matters handled by the persons referred to in Article 68 or the entities supervised by them, or with decisions taken during their term of office."

The application under review is admissible, as it meets the required formal requirements of an application under Article 73, paragraphs 1 and 2, of Law 4622/2019, given that its content is specific regarding the intended pursuit of professional activity by Mr. …… as an employee of a single-member public limited company; furthermore, it is submitted by a person authorized to do so, as the applicant has served as Chairman of the Hellenic Telecommunications and Post Commission (EETT) and, as such, holds the status provided for in Article 68(par.1)(c) of Law 4622/2019.

Furthermore, he is required to submit the above application to the Ethics Committee, pursuant to the provisions of Article 73(par.1) and 2 of Law 4622/2019, based on the aforementioned capacity, which he acquired pursuant to the Acts of the Council of Ministers No. 2 of February 9, 2018 (Government Gazette, Series Y.O.D.D. 72/2-09-02-2018) and No. 5 of February 16, 2022 (Government Gazette, Y.O.D.D. Vol. 114/February 17, 2022) and lost his eligibility upon the expiration of his second four-year term, based on the last of the aforementioned Ministerial Decisions, on February 16, 2026, as provided for in Article 6, paragraph 3, of Law 4070/2012. Consequently, one (1) year has not yet elapsed since his departure from the position.

With regard to the further examination of the application of Article 73 of Law 4622/2019, it must be examined whether the applicant's engagement in the professional activity described in the application under review—as an employee of the company named "……"— , is related to the activities of the Hellenic Telecommunications and Post Commission (EETT), where he served as Chairman, and whether this could give rise to a conflict of interest within the meaning of Article 71, paragraphs 2 and 3, of Law 4622/2019.

Specifically, it must first be determined whether there is any connection between the scope of EETT's activities and the professional activity the applicant wishes to pursue at the above-mentioned company as Director of Innovation and New Markets, under a permanent employment contract. The duties of the aforementioned position, as indicated by way of example in the application under review, pertain primarily to foreign countries and only secondarily or supplementarily to Greece, and are as follows:

a) Identifying new business models, revenue streams, and market opportunities. Priority markets include, but are not limited to: Computing infrastructure (Data centers, Edge cloud, High-performance computing) ▪ Semiconductors (chiplets, AI accelerators, and advanced packaging) Content and applications (AI-powered film production, synthetic content) ▪ Educational technologies (AI-assisted STEM and language learning, Workforce upskilling) Defense and Space (Low-Earth-orbit satellites, Autonomous Operation and Navigation in GNSS-Denied Environments, Cyberwarfare, Spectrum Monitoring) Energy (Alternative Energy Storage Technologies and Smart Grid/Smart City Applications).

b) Developing a vision, strategy, and methodologies for launching new products and services, introducing disruptive ideas, and improving existing processes.

c) Overseeing innovation projects, from conception to implementation, and collaborating with product, marketing, and technology teams to ensure successful execution.

d) Establishing strategic partnerships and an international presence.

Regarding the scope of activities and, more specifically, the responsibilities of the "Hellenic Telecommunications and Post Commission," Article 6 (par.1) of Law 4070/2012 (Government Gazette A' 82/2012), as amended and currently in force, provides that:

1. Subject to the provisions of Article 4, the control, regulation, and supervision of the electronic communications market shall be exercised by the HellenicTelecommunications and Post Commission (EETT), which serves as the National Regulatory Authority for matters concerning the provision of electronic communications networks and services, associated facilities, and related services, and was established by Law 2246/1994 (A' 172). EETT is an independent administrative authority headquartered in Athens; it enjoys full administrative and financial autonomy, acts independently, and neither seeks nor accepts instructions from any other body regarding the performance of the duties assigned to it.

2. EETT consists of nine (9) members, one of whom serves as Chairman and two as Vice Chairmen. Of the two Vice-Chairmen, one is responsible for the electronic communications sector and the other for the postal services sector. Members of EETT, are selected from among individuals of recognized standing and high academic qualifications, with academic or professional expertise in the fields of natural sciences, economics, and law, particularly in the telecommunications and postal sectors.

3. The Chairman and Vice Chairmen are selected and appointed by the Council of Ministers, following a proposal by the Minister of "Digital Policy, Telecommunications, and Information" and the opinion of the Parliament's Committee on Institutions and Transparency. The remaining members of the EETT are appointed by the Minister of "Digital Policy, Telecommunications, and Information." The appointment decisions for all members of the EETT are published in the Government Gazette. The term of office of the President and members of EETT is four years. Members of EETT may not be appointed for more than two terms, whether consecutive or not.

Specifically, regarding the EETT's powers, Article 12 of Law 4070/2012 stipulates the following:

EETT has the following powers with respect to matters concerning electronic communications:

(a)...(s)

(t) It supervises and monitors the use of the radio frequency spectrum and imposes the relevant penalties. To this end, it establishes inspection teams by decision, determining their composition and remuneration. […]

(x) It regulates matters concerning Internet domain names ending in ".gr," as well as any other domain or subdomain granted in Greece. It issues a Regulation governing all matters concerning the assignment of Internet domain names ending in ".gr," their terms of use, grounds for cancellation, terms of transfer, the maintenance of the registry of assigned domain names, the fees for the provision of related services, the supervision of usage, and any other matter concerning the operation and use of Internet domain names ending in ". gr," as well as any other domain or subdomain granted in Greece. The above domain names constitute resources of the Greek State, which are granted exclusively by EETT, solely for use. […]

(y) It exercises the duties and powers of the supervisory body for trust services, in accordance with the provisions of EU Regulation No. 910/2014 of the European Parliament and of the European Council of July 23, 2014, and in particular Article 17 thereof. It compiles, maintains, and publishes the National Trust List, in accordance with Article 22 of the same EU Regulation, and notifies the European Commission accordingly."

(ac) It maintains a website where it publishes regulatory texts, decisions, reports, consultations, and information that contribute to the creation of an open and competitive market, and updates the website at regular intervals, subject to the provisions on business confidentiality. Subject to the provisions on business confidentiality and with the removal of any identifying information regarding the penalized undertaking, the following shall be published on this website within one month of their notification to the penalized undertaking: all decisions imposing sanctions on electronic communications undertakings.

(ad) It shall provide the General Secretariat for Telecommunications and Post, upon its written request, with any information it possesses or is able to obtain subject to the provisions on business confidentiality.

(af) It issues Operating Regulations, which govern the internal operations of EETT.

(ag) It makes recommendations or issues opinions on the adoption of regulatory acts, in accordance with this law.

(aj) It establishes, by decision, on-call teams, inspection teams, permanent and ad hoc committees, as well as working groups to examine and investigate matters falling within its jurisdiction and related to its proper functioning, determining their composition and remuneration in accordance with the provisions in force. […]

(al) It enters into real estate lease agreements to meet its housing needs. The relevant procedure is established by decision of the Minister of Infrastructure, Transport, and Networks, following a recommendation by EETT. […]

(am) It may donate equipment with depreciated economic value to public benefit organizations.

(ao) It issues decisions to regulate Internet addressing issues, such as, for example, matters related to the transition from Internet communication protocols (IPv4 to IPv6), keeping stakeholders informed, and ensuring that services comply with technological

developments; it also specifies the corresponding Standards and Recommendations of the International Telecommunication Union.

Specifically, the EETT serves as the National Regulatory Authority for matters concerning the provision of electronic communications networks and services, related facilities, and related services. As stated on the Commission's website, EETT regulates, supervises, and monitors:

The electronic communications market, in which companies/providers of fixed and/or mobile services, wireless communications, and Internet services are primarily active.

The use of the radio frequency spectrum, with responsibility, among other things, for granting, revoking or restricting rights to use radio frequencies and to license antenna installations, as well as for matters concerning the conditions for placing radio equipment on the market and its use.

Furthermore, EETT exercises, on an exclusive basis and in their entirety, the powers of a competition authority, exercising all its supervisory powers and rights, in the application of national and EU legislation on free competition in the electronic communications and postal services markets. In this context, it ensures the smooth functioning of the markets by effectively addressing risks of distortion of competition and safeguarding users' rights.

In addition, EETT serves as the national Digital Services Coordinator. As part of this role, it ensures that providers of digital intermediary services comply with the Digital Services Act in Greece and oversees its implementation. It also ensures coordination at the national level and contributes to the effective and consistent implementation of the Act within the European Union (EU).

At the same time, EETT resolves disputes between copyright holders and digital platforms by issuing a non-binding opinion if their negotiations to determine the remuneration paid to publishers fail. Furthermore, it issues a Regulation setting forth the criteria for calculating the remuneration paid to publishers by information society service providers.

Furthermore, EETT is the competent authority for monitoring and enforcing compliance with certain provisions of the EU Regulation concerning the fight against the dissemination of terrorist content on the Internet.

Finally, EETT has authority regarding the procedure for blocking access to illegal broadcasts via digital platforms.

It follows from the foregoing that the tasks mentioned above by way of example—which the applicant was asked to perform at the company named "…." are not, at first glance, related to the responsibilities and activities of the Hellenic Telecommunications and Post Commission (EETT) as set forth above.

However, pursuant to Article …, paragraphs 1 and 2—Purpose of the Articles of Association of the company named "……", which was established on …. with Tax Identification Number…. and General Commercial Registry (GEMI) No. ….:

"1. The purpose of the company is:

a.

b.

c.

d.

e.

2. To pursue its purpose, the Company may enter any transaction and undertake any activity, including, but not limited to, the following:

a. ….

b. ….

c. ….

d. ….

e. ….

f. ….

It is noted that the above-mentioned company, as stated in Article 24 of its Articles of Association, has as its sole founder and shareholder the company under the name "…." (formerly "….."), with registered office at …., company registration number …. in the Commercial Registry of … and Tax Identification Number …., under the jurisdiction of the Tax Office …. This company, as stated on its website, is the leading telecommunications and media provider services in Southeast Europe.

By our letter Ref. No. …/April 20, 2026, the applicant was asked to inform us whether, during his tenure as Chairman of the Hellenic Telecommunications and Post Commission, he handled matters, made decisions, or participated in decision-making that generally concerned the company named "…." (formerly "….") or its subsidiaries operating in Greece, and, if so, to provide us with the relevant information.

In his response dated April 22, 2026, the applicant informed the Committee that during his term of office, no decisions were made by the Plenary Session or the Chairman of EETT, and in general, he did not handle matters concerning "…" (formerly "…"), whereas, on the contrary, he issued … (…) decisions and participated in the adoption of a large number of EETT Plenary Session decisions concerning the company's two subsidiaries, which are already operating in Greece.

From all the above, the following conclusions can be drawn:

A comparison of, on the one hand, the legislative framework governing the powers of the Hellenic Telecommunications and Post Commission (EETT) and, on the other, the purposes of the company named "…. ," as set forth in its Articles of Association, it appears that the purpose of the aforementioned company—specifically regarding the design, development, installation, operation, management, maintenance, use, purchase, sale, lease, and sublease of all types of telecommunications centers and telecommunications network and service buildings, data centers, and information and data management and processing centers, Internet and e-commerce centers, as well as call centers, is related to the mission, responsibilities, and general activities of the Hellenic Telecommunications and Post Commission (EETT) as mentioned above.

Furthermore, based on the supplementary information submitted by the applicant, it follows that the company where he wishes to be employed belongs to a group of

companies that includes firms such as "…." and "…" which are also subsidiaries of "…..." with telecommunications networks as their primary field of activity. In fact, during his tenure as Chairman of EETT, the applicant issued decisions awarding a lease agreement to one of the above-mentioned companies or extending the lease term for EETT's digital lines. Consequently, he has participated in the process of negotiating and awarding contracts to companies operating in the field of telecommunications networks, specifically those belonging to the same group as the one where he wishes to work. Therefore, although the company that is the applicant's future employment is a newly established company and, in fact, there is no question of his participation in decisions regarding the negotiation or conclusion of contracts with, compliance audits of, or the possible imposition of sanctions on said company, such actions have been carried out by him in the course of his duties as Chairman of EETT in relation to other companies within the same group, which fall under EETT's regulatory purview and have been the subject of EETT's oversight and decisions.

Furthermore, the applicant, within the scope of the duties of the position of Director of Innovation and New Markets proposed to him, as described above, will in fact ensure, to promote the company's operations and within the framework of the aforementioned specific objective, given that his many years of experience as Chairman of EETT will be directly applicable to this end. In particular, the applicant's assumption of the position could facilitate the granting of licenses for the construction and operation of all types of telecommunications centers and buildings for telecommunications networks and services, Internet communication centers, and e- commerce, as well as call centers, which would strengthen the company's position in the competitive environment of telecommunications firms. Furthermore, his previous tenure could influence the EETT's audit teams during their inspections regarding the compliance of the company where he wishes to work with national and EU regulations in the field of telecommunications.

Consequently, should the applicant provide the aforementioned services to the company named "……", a conflict of interest will arise within the meaning of Article 73(par.1), second subparagraph, point (a) of Law 4622/2019, in view of the duties he performed during his tenure as Chairman of EETT. More specifically, given the short time that has elapsed since his departure from the Authority, he is acquainted with the employees—his former subordinates—who are responsible for matters related to the fulfillment of aforementioned company's business objectives. Consequently, an issue of exerting undue influence—even indirectly—on these individuals in the performance of their duties could arise. Furthermore, he may make use of the privileged and specialized information—whether confidential or not—as well as the expertise and network of contacts he acquired during his many years of service as Chairman of EETT in the context of providing services related to the scope and responsibilities of EETT and, more generally, in furthering the company's business objective.

Furthermore, the company's potential clients are either Greek companies, their subsidiaries, or their affiliates, including foreign subsidiaries or affiliates operating abroad, which will request the services provided by the above mentioned company, it is likely—given the short time that has elapsed since the applicant's departure from the position of Chairman of the Hellenic Telecommunications and Post Commission (EETT) as well as his many years of service at EETT, have already been served by the Authority in the course of its activities.

Moreover, the fact that only a short period has elapsed since the applicant left the office of Chairman of EETT, will be particularly beneficial for attracting clients, who will rely on his recent knowledge and, in all likelihood, his familiarity with and collaboration with

high-ranking officials of the Hellenic Telecommunications and Post Commission (EETT), who are likely to remain in key positions of responsibility and decision-making authority.

Considering the above, the Ethics Committee unanimously decides as follows:

a) Not to grant Mr. …, former Chairman of the Hellenic Telecommunications and Post Commission (EETT), the requested permission to work for the newly established company under the name "….." as Director of Innovation and New Markets, under a permanent employment contract.

b) Not to award the applicant a reasonable compensation, as provided for in Article 73, par. 4(c) of Law 4622/2019, because the purpose of the provision is for the Ethics Committee to utilize the remedial measure of compensation in cases where the applicant in question is barred from practicing his profession in general, resulting in harm to his professional freedom, his financial situation, and, more generally, his personal development. In this case, however, such a situation does not apply, because it concerns a prohibition on practicing only the specific professional activity referred to above for a period of one year following his departure from the position of Chairman of the Hellenic Telecommunications and Post Commission (EETT). Moreover, according to under ref. number. …. /02-02-2026 Certificate from …, he has returned to active payroll status since 18-02-2026. Furthermore, given his exceptionally high qualifications, he is in a position to seek another position that does not create a conflict of interest.

The Chairman of the Ethics Committee **The Secretary**

Paraskevas Nomikos **Eleni Magkafa**