



## **DECISION 4<sup>1</sup>**

### **"Technical issues on conversation files in the Natural Gas Trading Platform of HEnEx"**

(as approved by HEnEx's BoD at its meeting with number 65/02.02.2022)

#### **HELLENIC ENERGY EXCHANGE S.A.**

Having taken into consideration the provisions of subsection 3.3.9 of the Rulebook for the Natural Gas Trading Platform of HEnEx (hereinafter referred to as the "Rulebook"):

#### **DECIDES AS FOLLOWS**

##### **Scope**

1. This Decision defines the technical details of the installation and activation of a special system for monitoring and recording the conversations in order to facilitate HEnEx's operations. The monitoring and conversation recording files kept, shall have full force of proof between HEnEx and the aforementioned persons, counter proof being allowed.
2. The recording of the talks is carried out in accordance with the provisions of Law n. 4514/2018 and the Commission delegated EU Regulation 2017/565.
3. In particular, the provisions of this Decision shall apply to the transaction support of Participants ("Third Party Order Routing" service) in the event of technical malfunctions of the Participants' systems or other emergency. In order to support the Participants, HEnEx may offer the Trading on Behalf service. For the implementation of this service, HEnEx uses technological means for recording telephone conversations concerning the submission of buy and sell Orders on behalf of Participants unable to access the Trading System.
4. The terms of this Decision have the same meaning as the meaning attributed thereto in Law n. 4425/2016, Law n. 4001/2011 or other relevant national or union legislation, the Rulebook, the EnExClear Natural Gas Trading Platform Clearing Rulebook, including any other decisions adopted for its implementation.

#### **Article 1. Technical Details on Conversation Recording**

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<sup>1</sup> Unofficial translation from the Greek language (Ref. HenEx: 172/03.02.2022), as of 03/02/2022. In case of any discrepancy between the Greek and the English version, the Greek version prevails.

1. HEnEx records telephone conversations, particularly in case they relate to the registration, modification or cancellation of buy and sell orders in the Trading Platform, taking all available security measures. These talks are recorded regardless of the economic impact they have upon the Participant.
2. Prior to contacting the registered telephone, HEnEx' authorized body verifies the identity details of the calling Certified Trader.
3. HEnEx does not provide any service and in particular the service of receiving and registering, modifying or cancelling the sell or buy order at the Trading Platform by phone if it has not notified the Participant in advance that the telephone conversation is to be recorded.
4. A copy of the recording of the conversations and the communication with the Participant is available upon request, for a period of five (5) years. The information that the conversations are recorded is presented in the same language used in the provision of services through a recorded telephone call.
5. Files of recorded conversations are stored in a fixed means, which allows them to be reproduced or copied, kept in a format that does not allow the original file to be modified or deleted, and they are stored in means that allows them to be easily accessible and available to participants upon request.
6. HEnEx is obliged to ensure the quality, accuracy and completeness of the files of all telephone conversations.
7. The telephone numbers for any contact with HEnEx are posted on HEnEx's website.

## **Article 2. Validity**

This decision takes effect as from 04/02/2022.

This decision is to be posted on HEnEx website [www.enexgroup.gr](http://www.enexgroup.gr).