

**Notification Procedure for the transactions of persons exercising managerial duties.**

According to Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation - MAR) and by authorization of Regulation (EC) No 2016/522, person who exercise managerial duties, as well as those who are closely related to them, notify the Company of any transaction carried out for their own account and which is associated with the shares of the Company or related companies or with derivative instruments or other related financial instruments. These notifications are made immediately and no later than three working days after the transaction date.

All transactions carried out by the persons referred to in paragraph 1 for their own account shall be notified by those persons to the Competent Authorities.

The Company ensures that the information notified in accordance with paragraph 1 is disclosed immediately and no later than three working days after the transaction, to the Competent Authorities.

The notification of transactions referred to in paragraph 1 shall include the following information:

- the person's name
- the reason for the notification
- the Company's name
- description and identification code of the financial instrument
- the nature of the transactions (e.g. acquisition or disposal)
- the date and place of the transactions
- the price and volume of transactions. In the case of a pledge whose terms provide for a change of rights, this must be disclosed together with its value at the date of the pledge.

The persons exercising managerial duties are obliged to inform the persons with whom they are closely associated, about their obligations deriving from the legislation.

The Shareholder Service & Corporate Announcements Unit is responsible for observing the aforementioned, as well as informing the competent bodies.

Notification Procedure for significant participations, Law 3556/2007.

According to article 9 of Law 3556/2007, a shareholder who acquires or disposes of shares with voting rights (voting shares) that have been admitted to trading in a regulated market and whose percentage of voting rights reaches, exceeds or falls below the limits of 5%, 10%, 15%, 20%, 25%, 1/3, 50% and 2/3, due to this acquisition or disposal, is obliged to inform the Company about the percentage of voting rights held as a result of this of acquisition or disposal. For the application of the previous paragraph, voting rights are calculated, even if their exercise has been suspended. Whoever becomes a shareholder for the first time has the same obligation provided that the relevant limits are reached or exceeded with this acquisition.

The obligation of the previous paragraph applies:

- in respect of all voting shares, and
- for each individual category of shares, provided that they incorporate voting rights.

The obligation of paragraph 1 also exists in any case where the percentage of shareholder voting rights reaches, exceeds or falls below the limits provided in paragraph 1, as a result of corporate events which change the distribution of voting rights. The notification is based on the information published by the Company.

A shareholder who holds a percentage of voting rights greater than 10%, is obliged to provide the notification set out in paragraph 1 and in any case where there is a change in the percentage of voting rights held equal to or greater than 3% of the total voting rights of the Company, as a result of acquisition or disposal of shares with voting rights or corporate events of the above paragraph. New changes of the above amount, which happen after the notification according to this paragraph, create a new obligation for notification.

The persons who have the obligation for notification, according to articles 9 - 11 of Law 3556/2007, must notify significant participations, according to the above

provisions, changes of their participations in the Company's voting rights, to the Company and the Hellenic Capital Market Commission.

Through the Shareholder Service & Corporate Announcements Unit the Company receives notifications and publishes all the necessary information concerning significant changes in the participations on the voting rights of liable persons in accordance with the provisions of Law 3556/2007. In particular, the Company publishes all the information contained in the notification of paragraph 1 of article 14 of Law 3556/2007 and article 11 of the above law, which is received from the liable persons, immediately upon receipt of the said notification and, in any case, no later than two (2) trading days from the date of above notification.

The Company and the Hellenic Capital Market Commission shall be informed in writing (Annex 1) as soon as possible and, in any case, no later than three (3) trading days after the date on which the shareholder or person referred to in Article 10 of Law 3556/2007:

- Is informed of the acquisition or disposal or possibility of exercising voting rights; or
- taking into account the circumstances, should have been informed of the acquisition or disposal or exercise of voting rights, regardless of the date on which the acquisition or disposal or exercise of voting rights took place, or
- is informed about an event mentioned in paragraph 3 of article 9 of Law 3556/2007.

#### Obligations to inform holders of securities.

The Company ensures equal treatment of all shareholders in the same position. It ensures that all convenience and information necessary for shareholders to exercise their rights is available, and that the integrity of the data is preserved.

In the context of providing convenience and information to shareholders, according to the previous paragraph, the Company takes special care:

- to provide information about the place, date and agenda of the meetings, the total number of shares and voting rights and the shareholders' participation rights in the meetings;
- to distribute of a power of attorney form in printed or, as the case may be, in electronic form to any person entitled to vote at a shareholders' meeting, at the same time as the notice for the meeting or, if requested, after the meeting;
- to designate a credit institution or Investment Services Company (investment firm) as an assignee, through which shareholders can exercise their pecuniary-related rights; and
- to publish announcements or circulate instructions about the distribution and payment of dividends and the issuance of new shares, including information about how to distribute, register, cancel or convert.

The Shareholder Service & Corporate Announcements Unit is responsible for the above information in accordance with the law.

# ANNEX 1

## NOTIFICATION FORM FOR SIGNIFICANT CHANGES IN VOTING RIGHTS

(Law 3556/2007, as in force, articles 9,10,11, 11a)

(sent to the Issuer and the Hellenic Capital Market Commission) <sup>i</sup>

<b>1. Identity of the Issuer or the Issuer of the underlying shares which incorporate voting rights<sup>ii</sup>:</b>						
<b>2. Reason for submitting the notification</b> (select one or more fields): <input type="checkbox"/> Acquisition or disposal of voting rights <input type="checkbox"/> Acquisition or disposal of financial instruments <input type="checkbox"/> Fact that changes the distribution of voting rights <input type="checkbox"/> Other (please specify) <sup>iii</sup> :						
<b>3. Details of the liable person(s) for the notification <sup>iv</sup> :</b> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none; vertical-align: top;">Name-Surname / Company name :</td> <td style="width: 50%; border: none; vertical-align: top;">City and Country of the registered office (if any):</td> </tr> </table>					Name-Surname / Company name :	City and Country of the registered office (if any):
Name-Surname / Company name :	City and Country of the registered office (if any):					
<b>4. Name- Surname of shareholder / shareholders</b> (if different from No.3) <sup>v</sup> :						
<b>5. Date on which the percentage of voting rights of the liable person reaches, exceeds or falls below the set limits, or a change greater than or equal to 3% occurs <sup>vi</sup> :</b>						
<b>6. Total positions of the person(s) subject to the notification obligation <sup>vii</sup> :</b>						
	% of voting rights deriving from shares (total 7.A)	% of voting rights deriving from financial instruments (total 7.B.1 + 7.B.2)	Total% (7.A+7.B.1 +7.B.2)	Total number of voting rights of the issuer <sup>viii</sup>		
Situation after the date of the transaction in question						
Situation before the date of the transaction in question (if any)						

**7. Information about the situation present on the date on which the percentage of voting rights of the liable person reached, exceeded or fell below the set limits, or a change equal to or greater than 3% occurred <sup>ix</sup>:**

**A: Voting rights incorporated in shares**

Class of shares (ISIN code is also noted)	Number of voting rights <sup>x</sup>		% of voting rights	
	Directly (article 9 of law 3556/2007)	Indirectly (article 10 of law 3556/2007)	Directly (article 9 of law 3556/2007)	Indirectly (article 10 of law 3556/2007)
<b>SUBTOTAL A:</b>				

**B.1: Financial instruments according to article 11 par. 1.a) of law 3556/2007, as in force.**

Type of financial instrument	Expiration Date <sup>xi</sup>	Date / period of exercise / conversion <sup>xii</sup>	Number of voting rights that can be acquired in the event of an exercise / conversion of the instrument	% of voting rights
		<b>SUBTOTAL B.1</b>		

**B.2: Financial instruments with corresponding financial impact, according to article 11 par. 1.b) of Law 3556/2007, as in force.**

Type of financial instrument	Expiration Date <sup>xi</sup>	Date or period of exercise / Conversion <sup>xii</sup>	Physical delivery or cash Settlement <sup>iii</sup>	Number of voting rights <sup>xiv</sup>	% of voting rights <sup>xiv</sup>
			<b>SUBTOTAL B.2</b>		

**8. Information about the person who is obliged to submit a notification** (select the appropriate field):

☐ The person subject to notification shall not be controlled by another natural or legal person or entity and shall not control any other undertaking(s) owning directly or indirectly a participation in the issuer or in the issuer of the underlying security <sup>xv</sup>.

☐ **Complete** chain of controlled entities through which voting rights and financial instruments are effectively held, starting with the ultimate controller (natural person<sup>xvi</sup> or legal person or other entity) <sup>xvii</sup>:

Company Name <sup>xviii</sup>	% of voting rights if equal to or greater than the set limit	% of voting rights through financial instruments if equal to or greater than the set limit	Total if equal to or greater than the set limit

**9. In case of participation in a General Meeting through a power of attorney, who may exercise voting rights at his discretion:**

.....  
 .....  
 (name of the holder of the power of attorney)  
 will cease to hold .....( number) voting rights from  
 .....(date).

**10. Additional information<sup>xix</sup>:**

.....  
 .....  
 (Liable person's Name-Surname / Company name)  
  
 .....  
 (Signature)  
  
 .....  
 (Place, Date)

