



POLICY

OF AVOIDING CONFLICT OF INTEREST

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ΣΤΟΙΧΕΙΑ ΕΓΓΡΑΦΟΥ

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1. Introduction

Conflict of interest exists in those cases in which the - necessary for the benefit of the SA - independent judgment of the member of the BoD is affected (or may be affected) by the involvement of his own interest. These are the cases where the aspirations of the SA do not coincide (on the contrary: diverge) with those of the member of the Board. Therefore, the satisfaction of one of the mutual interests excludes (in whole or in part) the satisfaction of the other interest.

2. Obligations

According to the article 97 of Law 4548/2018, the members of the Board of Directors and every third person to whom have been assigned responsibilities, have an obligation of fidelity to the company.

They owe in particular:

- Not to pursue own interests that run counter to the interests of the company.
- To disclose in a timely and adequate manner to the other members of the Board of Directors their own interests, which may arise from the company's transactions, which fall within their duties, as well as any conflict of their interests with those of the company or related companies within the meaning of article 32 of law 4308/2014, which arises during the exercise of their duties.

They must also disclose any conflict of interest of the company with the interests of the persons of paragraph 2 of article 99 of law 4548/2018, if they are related to these persons. A sufficient disclosure is one that includes a description of both the transaction and the interests themselves. The companies disclose the cases of conflict of interest and any contracts that have been concluded and fall under Article 99 at the next regular general meeting of shareholders. In companies with securities listed on a regulated market, the disclosure is also made with the annual report of the board of directors.

- To maintain strict confidentiality about the corporate affairs and the secrets of the company, which became known to them due to their status as consultants.

The articles of association of the company may further specify the obligations of the previous paragraph.

The member of the Board of Directors is not entitled to vote on issues in which there is a conflict of interest with his company or persons with whom he is associated with a

relationship subject to paragraph 2 of article 99 of law 4548/2018. In these cases, the decisions are taken by the other members of the Board of Directors. In case the impossibility of voting concerns so many members, so that the rest do not form a quorum, the other members of the Board of Directors, regardless of their number, must convene a general meeting with the sole purpose of taking the specific decision.

3. Validity – Policy Modification

The Policy as well as any substantial modification is submitted for approval to the Board of Directors of the Company and after a positive suggestion, is applicable and posted on its website.