



**PROCEDURES PURSUANT TO PAR. 5, ARTICLE 26 OF THE OPERATING RULES OF THE DEMATERIALIZED SECURITIES SYSTEM WITH REGARD TO THE SERVICE FOR THE PROVISION OF DATA TO ISSUERS IN ORDER TO FACILITATE THE IDENTIFICATION OF SHAREHOLDERS FOR THEIR PARTICIPATION IN GENERAL MEETINGS FROM A REMOTE LOCATION**

**(In accordance with meeting no. 305/31.8.2020 of the Board of Directors of the HELLENIC CENTRAL SECURITIES DEPOSITORY [ATHEXCSD])**

Having regard to par. 5, article 26 and article 42<sup>a</sup> of the Operating Rules of the Dematerialized Securities System (decision 3/304/10.6.2004 of the Hellenic Capital Market Commission, Government Gazette B' 901/16.6.2004) (hereinafter the "Rulebook"), as in force, and the need to specify the procedures with regard to the "SERVICE FOR THE PROVISION OF DATA TO ISSUERS IN ORDER TO FACILITATE THE IDENTIFICATION OF SHAREHOLDERS FOR THEIR PARTICIPATION IN GENERAL MEETINGS FROM A REMOTE LOCATION" (hereinafter the "Service") which is provided by ATHEXCSD in implementation of the aforesaid provisions

**THE BOARD OF DIRECTORS OF THE  
HELLENIC CENTRAL SECURITIES DEPOSITORY (ATHEXCSD)**

**SETS OUT THE FOLLOWING PROCEDURES:**

**1. PRINTED APPLICATION OF THE ISSUER**

The content of the application submitted by the Issuer for use of the service of par. 5, article 26 of the Rulebook is as follows:

*"The Company ..... (hereinafter the "Company") hereby requests the use of the "SERVICE FOR THE PROVISION OF DATA TO ISSUERS IN ORDER TO FACILITATE THE IDENTIFICATION OF SHAREHOLDERS FOR THEIR PARTICIPATION IN GENERAL MEETINGS FROM A REMOTE LOCATION" (the "Service") which is provided by ATHEXCSD in accordance with par. 5, article 26 of the Rulebook and the "PROCEDURES PURSUANT TO PAR. 5, ARTICLE 26 OF THE OPERATING RULES OF THE DEMATERIALIZED SECURITIES SYSTEM WITH REGARD TO THE SERVICE FOR THE PROVISION OF DATA TO ISSUERS IN ORDER TO FACILITATE THE IDENTIFICATION OF SHAREHOLDERS FOR THEIR PARTICIPATION IN GENERAL MEETINGS FROM A REMOTE LOCATION" (meeting no. 305/31.8.2020 of the Board of Directors of*

ATHEXCSD) (hereinafter the “Procedures”) as these are posted on the website [www.athexgroup.gr](http://www.athexgroup.gr) and by reference to which are attached hereto as an integral part hereof as in force from time to time and regarding which the Company has been fully informed, accepting their content without reservation.

In order to use the Service, the Company requests that ATHEXCSD provide it with the list of eligible shareholders in accordance with article 42<sup>o</sup> of the Rulebook, accompanied by the details set out in par. 5, article 26 of the Rulebook, as specified from a technical viewpoint in the Annex of Procedures, in order to facilitate the holding of remote general meetings.

In the framework hereof, the Company states that:

(i) the mode of use and operation of the electronic means and methods of the general meeting will be under the full and exclusive responsibility of the Company and/or of the third-party providers duly authorized by it and

(ii) the data of par. 5, article 26 of the Rulebook, as specified from a technical viewpoint in the Procedures, will be used exclusively in the framework of the use of the Service and more specifically to facilitate the holding of remote general meetings, on the basis of applicable provisions in each instance and in any case in compliance with legislation on the protection of personal data (GDPR), and/or for other legitimate purposes which the Company discloses in its invitation or other announcements.

This application is being submitted for use of the Service in respect of the company’s General Meeting of ..... (filled out with details of the record date and the date of holding the general meeting).

For the use of the Service, the supporting documents in accordance with par. 11, Chapter 2 of the Procedures are also being submitted.

Signature of Company – Legal Representative”.

## **2. TERMS OF PROVISION OF THE SERVICE**

The service for the provision of data to Issuers in order to facilitate the identification of shareholders for their participation in general meetings from a remote location (Service) is provided by ATHEXCSD in accordance with the provisions of par. 5, article 26 and article 42<sup>a</sup> of the Rulebook and these Procedures. More specifically, Issuers may use the data provided by ATHEXCSD in order to identify shareholders registered in the Dematerialised Securities System (DSS) for the purpose of their participation in a general meeting from a remote location in the framework of applying the 2-factor authentication process or related processes implemented by Issuers on their own responsibility, as specified from a technical viewpoint in the Annex of these Procedures which is attached hereto and constitutes an integral part hereof.

These Procedures are attached to the Application that is submitted by the Issuer to ATHEXCSD, by its reference to them, for the use of the service by the Issuer, and constitute an integral part thereof.

## **I – PROVISION OF DATA BY OPERATORS TO ATHEXCSD IN CONNECTION WITH OPERATOR ACCOUNTS OF THEIR CLIENTS' INVESTOR SHARES**

1. In order for ATHEXCSD to provide the Service to Issuers, Operators must have provided ATHEXCSD with the details set out in par. 5, article 26 of the Rulebook in accordance with the formats and technical specifications stipulated by ATHEXCSD, as specified from a technical viewpoint in the Annex of these Procedures.
2. Operators must be fully ready to provide ATHEXCSD with the above-mentioned details of their clients and beneficiaries of the Operator Accounts they manage unless they have already been recorded by ATHEXCSD at the time of opening the Investor Share or subsequently on the basis of Operators' declarations.
3. Operators are responsible for the truth, accuracy and completeness of the above-mentioned details in the framework of their obligations as Operators in accordance with the Rulebook, and they are obliged to adopt the necessary contractual arrangements with their clients and beneficiaries in order to ensure their legitimacy to provide the relevant details to ATHEXCSD.

## **II – APPLICATION AND TERMS OF ITS SUBMISSION FOR USE OF THE SERVICE BY THE ISSUER**

1. For the use by the Issuer of the Service, the Issuer must submit a relevant application to ATHEXCSD in accordance with Chapter 1.
2. The Application must be submitted by the Issuer to ATHEXCSD by no later than the business day preceding the record date of the relevant corporate event as same has been notified to ATHEXCSD, in compliance with article 26 et seq. of the Rulebook.
3. Moreover, in order to use the Service, the Issuer must:
  - a) make available to ATHEXCSD:
    - (i) the invitation to the general meeting, which must specify the applicable procedure for participating in the general meeting and exercising the right to vote by electronic means and methods, or
    - (ii) the resolution of the general meeting or the statutory provisions which specify the aforesaid electronic means and methods, as such resolution is published in the General Electronic Commercial Registry (GECR) or, in the case of foreign Issuers, in the business register maintained in the relevant jurisdiction or, in implementation of par. 2, article 33 of the Legislative Act (Government Gazette A' 68/20.03.2020) and article 4 of Law 4702/2020 (Government Gazette A' 130/03.07.2020), the decision of the company's competent body on the use of the abovementioned means and methods, as in force in compliance also with the terms of article 23, Law 4712/2020.
  - b) declare in writing and in accordance with the procedures of ATHEXCSD that:

(i) the mode of use and operation of the aforesaid electronic means and methods is under the full and exclusive responsibility of the Company and/or of the third-party providers duly authorized by it;

(ii) the data of par. 5, article 26 of the Rulebook will be used exclusively in the framework of the use of the Service and more specifically to facilitate the holding of remote general meetings, on the basis of applicable provisions in each instance and in any case in compliance with legislation on the protection of personal data (GDPR), and/or for other legitimate purposes which the Company discloses in its invitation or other announcements;

(iii) it accepts the terms of these Procedures.

4. The Issuer must submit to ATHEXCSD any data or supporting document deemed by ATHEXCSD to be necessary in connection with its aforementioned application in accordance with the procedures of ATHEXCSD.

5. ATHEXCSD accepts the Application of the Issuer the same day provided the Issuer fulfils its obligations in accordance with subparagraphs 1 to 4 above. After accepting the application, ATHEXCSD immediately announces the use of the Service by the Issuer together with any other data or information which it deems necessary for the operation of the Service.

6. ATHEXCSD electronically transmits the data of subpar. 1, paragraph I of this Chapter to the Issuer, in accordance with the relevant entries in the DSS and in any case as such data have been provided by the Operators keeping the relevant Operator Accounts for their clients and beneficiary shareholders in accordance with the terms of par. I, Chapter 1. The aforesaid transmission may be carried out on a continuous basis up to one (1) hour before the commencement of the general meeting. If an Operator does not provide the data of subpar. 1 above relating to a beneficiary of an Operator Account managed by it, ATHEXCSD sends a reminder to the Operator and makes every possible effort to obtain the data from the Operator and transmit them in timely fashion to the Issuer before commencement of the general meeting.

7. The Issuer may use the aforementioned data to identify shareholders registered in the DSS for their participation in a general meeting from a remote location in the framework of applying 2-factor authentication processes and/or other related processes it implements under its own responsibility. Without prejudice to the provisions of the Rulebook, ATHEXCSD bears no responsibility for the truth, correctness or completeness of the data provided as above, nor for the observance of applicable time limits by Operators and the Issuer in accordance with legislation and the terms hereof.

These Procedures shall apply from 31.08.2020.

These Procedures are to be posted on the website [www.athexgroup.gr](http://www.athexgroup.gr).

**ANNEX – DATA PROVIDED BY ATHEXCSD TO ISSUERS FOR THE IDENTIFICATION OF SHAREHOLDERS REGISTERED IN THE DSS FOR THEIR PARTICIPATION IN A REMOTE GENERAL MEETING IN THE FRAMEWORK OF THE “2-FACTOR AUTHENTICATION” PROCESS**

The data provided by ATHEXCSD to Issuers for the identification of shareholders registered in the DSS for their participation in a remote general meeting in the framework of the “2-factor authentication” process on the basis of the relevant entries in the DSS/data submitted by Operators are as follows:

- 1.** List of eligible participants in accordance with article 42<sup>a</sup>, par. 1, item b of the Rulebook.
- 2.** E-mail address in accordance with par. 5, article 26 of the Rulebook.
- 3.** Mobile phone number in accordance with par. 5, article 26 of the Rulebook.
- 4.** If the eligible shareholder is a legal person, the unique legal entity identifier (GECR/LEI/BIC/EUID).
- 5.** In the case of beneficiaries-representatives of a Joint Investor Share (JIS), the shareholder details under 1 to 3 above are recorded under the general details of the investor of the Investor Share of the 1<sup>st</sup> living joint beneficiary in the respective hierarchy in the case of a JIS (articles 6<sup>A</sup> and 42<sup>a</sup> par. 2 of the Rulebook).
- 6.** In the case of beneficiaries-representatives and a Co-Owners’ Investor Share, the shareholder details under 1 to 4 where applicable above are recorded under the general details of the investor of the Investor Share of the authorised representative (of one of the co-owners) for all the co-owners in the case of a Co-Owners’ Investor Share (article 6 of the Rulebook).