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RESOLUTION 8

"Services to facilitate the identification of shareholders at remote general meetings & provision of a 2-factor authentication procedure for investor access to electronic services of ATHEXCSD"

THE BOARD OF DIRECTORS OF THE HELLENIC CENTRAL SECURITIES DEPOSITORY S.A. (ATHEXCSD)

(Meeting 301/27.04.2020)

Having regard to:

1. The provisions of articles 121 par. 4, 124 par. 6 and 7 and 125 of Law 4548/2018, the relevant provisions of Directive 2007/36/EC, article 33 of the Legislative Act published in Government Gazette A' 68/20.03.2020, the provisions of articles 2 par. 5, 4, 24, 26 par. 2 and 42a 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 determine the manner in which data are provided by ATHEXCSD to issuers, as the latter are defined in the Athens Exchange Rulebook and Alternative Market Rulebook (hereinafter "Issuers"), to facilitate the participation of shareholders in general meetings from a remote location,
2. The provision of article 23 of the Rulebook and the need to facilitate the use by investors of electronic services providing information on their Share and Operator Account balances through the adoption of advanced security methods,

HEREBY RESOLVES AS FOLLOWS:

Scope

1. Chapter I of this Resolution sets out the data that Operators must provide to ATHEXCSD in connection with Operator Accounts of Shares of beneficiaries and of their clients, to be used as

additional data for the identification of clients, for the purpose of facilitating remote general meetings of Issuers, in accordance with the terms of the service provided by ATHEXCSD as set out in Chapter II, the operation of the special procedure (2-factor authentication) for which provision is made in Chapter III as well as in any other legal instance. Chapter I also sets out the terms and conditions governing the provision of the relevant data. The data of Chapter I are governed by the terms which also apply to data of Shares in accordance with applicable legislation and the Rulebook.

2. Chapter II of this Resolution sets out the terms and conditions governing the provision of the data service by ATHEXCSD to Issuers in order to facilitate the identification of shareholders for their participation in general meetings from a remote location (hereinafter the "Service"). The Service may also be provided in other cases of corporate actions subject to the terms of article 3, Chapter II.

3. Chapter III of this Resolution sets out the terms and conditions governing the operation by ATHEXCSD of the special "2-factor authentication" procedure to facilitate investor access to the electronic services of ATHEXCSD, particularly the provision by ATHEXCSD of information on their Share and Operator Account balances.

4. Chapter IV stipulates the transitional arrangements and entry into force of this Resolution.

CHAPTER I

PROVISION OF DATA BY OPERATORS TO ATHEXCSD IN CONNECTION WITH OPERATOR ACCOUNTS OF THEIR CLIENTS' SHARES

1. Data provision procedure

1. For the purpose of implementing the terms of Chapter II and Chapter III of this Resolution, Operators must provide to ATHEXCSD, in accordance with its procedures, the following data on their clients and beneficiaries of the Operator Accounts managed by them:

- a) the email address of the shareholder,
- b) the mobile phone number of the shareholder.

2. Operators must verify the correctness of the data they provide in accordance with par. 1, on the basis of the data kept in the DSS on the Shares of beneficiaries and their clients which they represent, and also make any necessary corrections to data where applicable.

2. Obligations of Operators

1. Operators must be fully ready to provide to ATHEXCSD, in accordance with article 1 of this Chapter, the data on their clients and beneficiaries of Operator Accounts they manage or create in the Dematerialized Securities System (DSS).

2. Operators are responsible for the veracity, correctness and completeness of the data of par. 1, article 1 of this Chapter which they provide to ATHEXCSD, and are required to adopt the necessary

contractual arrangements with their clients and beneficiaries in order to ensure their legitimacy to provide the relevant data to ATHEXCSD.

3. Archiving – Updating of data

1. ATHEXCSD archives the data of par. 1, article 1 of this Chapter, as such data are provided by Operators. This archiving is subject to the terms on record-keeping in accordance with par. 6, article 2 of the Rulebook, as well as to terms on the protection of personal data.

2. Operators are obliged to update the data of par. 1, article 1 of this Chapter which are provided to them by their clients and beneficiaries of the Operator Accounts managed by them, in order to ensure the reliability of such data when they are used in accordance with the terms of Chapters II and III as well as in any other legal instance.

CHAPTER II

SERVICE TO FACILITATE THE IDENTIFICATION OF SHAREHOLDERS FOR REMOTE GENERAL MEETINGS ("SERVICE")

1. Terms and conditions of use of the Service

1. In order to provide the Service to an Issuer, the Issuer must submit a relevant application to ATHEXCSD in accordance with its procedures, with which it asks ATHEXCSD to provide it with the list of entitled shareholders in accordance with article 42a of the Rulebook, accompanied by the data of par. 1, article 1 of Chapter I to facilitate the holding of remote general meetings. 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 action as same has been notified to ATHEXCSD, in compliance with articles 26 et seq. of the Rulebook.

2. 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, together with

(ii) the resolution of the general meeting or the statutory provisions which specify the aforesaid electronic means and methods, as published in the General Electronic Commercial Registry 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 published in Government Gazette A' 68/20.03.2020, the decision of the company's competent body on the use of the abovementioned means and methods.

b) declare in writing and in accordance with the procedures of ATHEXCSD that:

(i) the way in which the aforesaid electronic means and methods are used and operate falls within its full and sole responsibility or of that of third providers duly authorised by it,

(ii) the data of par. 1, article 1 of Chapter I will be used solely in the framework of use of the Service and more specifically to facilitate the holding of remote general meetings, on the basis of the provisions applicable in each case and in accordance with legislation on the protection of personal data (GDPR), or for other lawful reasons which it discloses in the invitation or other announcements of the Issuer,

(iii) it accepts the terms of this Resolution.

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

3. The Issuer may use the above-mentioned data to identify shareholders registered in the DSS for their participation in a general meeting from a remote location in the framework of maintaining 2-factor authentication procedures and/or other related procedures it implements under its responsibility. Without prejudice to the provisions of the Rulebook, ATHEXCSD bears no responsibility for the veracity, 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.

4. ATHEXCSD electronically transmits the data of par. 1 to the Issuer, 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 Chapter 1.

5. The aforesaid transmission may be carried out on a continuous basis up to one (1) hour before the commencement of the general meeting.

6. If an Operator does not provide the data of par. 1 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 the commencement of the general meeting.

2. Announcements by ATHEXCSD

1. ATHEXCSD accepts the application of the Issuer on the same day, provided the Issuer fulfils its obligations in accordance with par. 2, article 1 of this Chapter.

2. After accepting the application, ATHEXCSD immediately announces the use of the Service by the Issuer, along with any other data or information it deems necessary for the operation of the Service.

3. Use of the Service for other corporate actions

1. Similar terms to those set forth in articles 1 and 2 may be applied at the relevant request of Issuers also in any other instance of a corporate action, i.e. in addition to the holding of a general meeting, subject to the provisions of par. 2, article 26 of the Rulebook and pursuant to article 24 of the Rulebook.

2. ATHEXCSD may require Issuers to follow more specific procedures for using the Service, depending on the particular characteristics of each corporate action.
3. ATHEXCSD informs Issuers regarding the applicable procedures and makes the necessary announcements of the relevant information.

CHAPTER III

PROVISION OF ELECTRONIC INFORMATION TO INVESTORS USING THE SPECIAL "2-FACTOR AUTHENTICATION" PROCEDURE

1. Terms of use of the procedure

1. This Chapter sets out the terms and conditions governing the operation by ATHEXCSD of the special "2-factor authentication" procedure to facilitate investor access to the electronic services of ATHEXCSD, particularly the provision by ATHEXCSD of information on their Share and Operator Account balances, as well as information on corporate actions and general meetings of Issuers, or to other electronic services in general.

2. In the framework and for the purpose of providing electronic information to investors in accordance with par. 1, as specifically carried out through the AXIAweb service and in accordance with the terms thereof as posted by ATHEXCSD on its website (www.athexgroup.gr) or through any related service of ATHEXCSD, the possibility is granted to investors, at the request of the latter, to be given direct access by ATHEXCSD to the balance (status) of their Shares and Operator Accounts in accordance with the following specific terms.

3. The granting of access is subject to the following requirements:

a) the investor data of par. 1, article 1, Chapter I must previously have been declared by the Operator of the Operator Account of the investor's Share;

b) the special procedure, namely the "2-factor authentication" of the investor which is performed by ATHEXCSD, must have been successfully completed. In the framework of using the aforesaid procedure, the investor activates his/her account by means of an email message, chooses the account password, which he/she then authenticates by means of a one-time password sent to his/her mobile phone, thereby confirming his/her identity.

After confirmation of his/her identity in accordance with par. b, ATHEXCSD grants direct access to the investor in accordance with the above.

2. Publication of technical manuals

1. ATHEXCSD makes available technical manuals on the use of AXIAweb or related services which are provided through the special "2-factor authentication" procedure.

CHAPTER IV
FINAL PROVISIONS

1. Transitional arrangements

1. Operators with existing Operating Accounts at the time of entry into force of this Resolution must provide ATHEXCSD with the data of par. 1, article 1, Chapter I at the latest within fifteen (15) days from the entry into force hereof.

2. Applications for the provision of data through AXIAweb or another related service provided by ATHEXCSD are submitted in accordance with the procedure set out in Chapter III hereof, without prejudice to the emergency measures of Legislative Acts that have been adopted to address the consequences of the risks posed by the spread of the COVID-19 coronavirus and until such measures have been lifted.

2. Publication – Entry into Force

1. This Resolution shall be posted on the website www.athexgroup.gr.

2. This Resolution shall enter into force as of its posting, i.e. as of 27.4.2020.