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RESOLUTION 3

“Technical terms and procedures for the provision of the Initial Recording Service”

Codified to include the decisions dated 29.03.2021, 31.01.2022 and 27.03.2024 of the Board of Directors

THE BOARD OF DIRECTORS

OF HELLENIC CENTRAL SECURITIES DEPOSITORY S.A. (ATHEXCSD)

(Meeting 311/22-02-2021)

Having regard to the provisions of:

(a) articles 2.1.1.1, 2.1.1.2, 2.1.2, 2.2.1.1, 2.2.1.2, 2.2.2, 2.3 of Part 2, articles 3.1, 3.2, 3.4 of Part 3, articles 4.2, 4.3, 4.4, 4.5 of Part 4 and articles 5.1, 5.2, 5.3, 5.4, 5.6 of Part 5, Section IV of the ATHEXCSD Rulebook (hereinafter the “Rulebook”), the need to specify the information and supporting documents which must be submitted to ATHEXCSD by Issuers or Fund Managers in order for them to use the Initial Recording Service, as well as the procedures followed by ATHEXCSD for the deletion of transferable securities recorded in the Dematerialized Securities System (DSS);

(b) paragraphs 9, 12 and 13 of Part 1 (Definitions), Section I of the Rulebook, as well as the need to specify the information that must be provided by the aforesaid Issuers or Fund Managers in the Physical Securities Conversion Files, Physical Securities Immobilization Files and Beneficiary Allocation Files in the framework of the respective procedures relating to the Initial Recording Service; and

(c) the need to specify the technical terms and procedures for the provision of the Initial Recording Service

RESOLVES AS FOLLOWS:

Purpose & scope

1. Chapter One of this Resolution sets out the information and supporting documents which must be submitted to ATHEXCSD according to the Rulebook, in order for the following persons to use the Initial Recording Service:
 - a) Listed Issuers
 - b) Non-Listed Issuers
 - c) Managers of Exchange-Traded Funds
 - d) Managers of Non-Exchange-Traded Funds
2. Where, with regard to Listed Issuers or Non-Listed Issuers, the term 'company' is used herein, it shall also mean any other person falling within the above categories in accordance with the legislation. Similarly, where any reference is made herein to information or supporting documents of the company, such reference shall be to the respective information and supporting documents of that person.
3. Chapter two of this Resolution sets out the information that must be provided by the aforesaid Issuers and Fund Managers in the Physical Securities Conversion Files, Physical Securities Immobilization Files and Beneficiary Allocation Files in the context of the respective procedures for the Initial Recording Service.

CHAPTER ONE

A. Supporting documents for use of the Initial Recording Service by interested Listed Issuers

- 1. Supporting documents for use of the dematerialization service with conversion of physical securities (shares or other transferable securities) into dematerialized securities (article 2.1.1.1, Part 2, Section IV of the Rulebook):*

In order for interested Listed Issuers to use the dematerialization service with conversion of physical securities (shares or other transferable securities) into dematerialized securities, they must submit to ATHEXCSD the following information and supporting documents:

1. Application signed by the legal representative of the company for:
 - a) the use of the service, accompanied by a confirmation that the physical securities in question (shares or other transferable securities) of the interested Listed Issuer can indeed be dematerialized in accordance with the legal rules applicable to them. If the interested Listed Issuer is a foreign entity, ATHEXCSD may request a legal opinion to certify the above;
 - b) the opening of a Transitory Account and Issuer Share in the DSS;
 - c) the opening of a relevant Account and Issuer Share for non-appearing beneficiaries (or non-declaration of an intermediary) under the management of ATHEXCSD, where

applicable.

2. Certificate of registration of the last codified articles of association in the General Commercial Registry of Greece (GCR) or in another Company Registry, in the case of a foreign company, or an online search thereof, where applicable.
3. Copy of the minutes of the meeting of the competent body of the company which decided the conversion of shares or other transferable securities into dematerialized form or an online search thereof (GCR) or Company Registry), where applicable.
4. Copy of the minutes of the meeting of the competent body of the company including its valid legal representation according to the GCR or corresponding Company Registry, as appropriate, or an online search thereof, where applicable.
5. Application by the company for the issuance of ISIN, CFI and FISN codes.
6. Copy of the minutes of the meeting of the competent body of the company certifying full payment of the amount of funds raised (e.g., capital increase or bond loan), if applicable, or an online search thereof where applicable.
7. Copy of the approval decision of the Ministry of Development and its recording in the GCR or, in the case of a foreign company, of the Competent Authority and the relevant recording in the Company Registry, where required, or an online search thereof where applicable.
8. Solemn Declaration by the company that it will provide true and accurate information for recording.
9. Certificate requested by ATHEXCSD of the approval by the Trading Venue Operator of admission to trading of the relevant transferable securities on its Trading Venue.
10. In the case of admission to an ATHEX Trading Venue, it is sufficient that ATHEX certifies receipt of the above documents of points 1 to 9 in accordance with the procedures of ATHEX and ATHEXCSD. [The interested Listed Issuers shall notify ATHEX regarding the possibility of receipt by ATHEXCSD of all the above from 1 to 9].
11. After the collection of the physical securities by the interested Listed Issuer, completion and submission to ATHEXCSD of the Physical Securities Conversion File, in electronic and paper form, signed by the legal representatives of the company, as well as a certificate of the company confirming that the data included in the list fully match those of the conversion file that was submitted, on the basis of ATHEXCSD procedures.
12. Letter from the company certifying fulfilment of its financial obligations to ATHEXCSD.

II. Supporting documents for use of the dematerialization service with direct issue of shares or other transferable securities in dematerialized form (article 2.1.1.2, Part 2, Section IV of the Rulebook):

In order for interested Listed Issuers to use the dematerialization service with direct issue of shares or other transferable securities in dematerialized form, they must submit to ATHEXCSD the following information and supporting documents:

1. Application signed by the legal representative of the company for:
 - a) the use of the service, accompanied by relevant confirmation that the shares or other transferable securities in question of the interested Listed Issuer can indeed be dematerialized in accordance with the legal rules applicable to them. If the interested Listed Issuer is a foreign entity, ATHEXCSD may request a legal opinion to certify the above;
 - b) the opening of a Transitory Account and Issuer Share in the DSS;

- c) the opening of a relevant Account and Issuer Share for non-appearing beneficiaries (or non-declaration of an intermediary) under the management of ATHEXCSD, where applicable.
2. Certificate of registration of the last codified articles of association in the GCR or in another Company Registry, in the case of a foreign company, or an online search thereof, where applicable.
3. Copy of the minutes of the meeting of the competent body of the company which decided the issue of shares or other transferable securities in dematerialized form or an online search thereof (GCR or Company Registry), where applicable. The aforesaid minutes must be submitted especially when the articles of association make no provision for the issue of securities in dematerialized form.
4. Copy of the minutes of the meeting of the competent body of the company including its valid legal representation according to the GCR or corresponding Company Registry, as appropriate, or an online search thereof, where applicable.
5. Application by the company for the issuance of ISIN, CFI and FISN codes.
6. Copy of the minutes of the meeting of the competent body of the company certifying full payment of the amount of funds raised (e.g., capital increase or bondloan) or an online search thereof, if applicable.
7. Copy of the approval decision of the Ministry of Development and its recording in the GCR or, in the case of a foreign company, of the Competent Authority and the relevant recording in the Company Registry, where required, or an online search thereof where applicable.
8. Solemn Declaration by the company that it will provide true and accurate information for recording.
9. Certificate requested by ATHEXCSD of the approval by the Trading Venue Operator of admission to trading of the relevant transferable securities on its Trading Venue.
10. In the case of admission to an ATHEX Trading Venue, it is sufficient that ATHEX certifies receipt of the above documents of points 1 to 9 in accordance with the procedures of ATHEX and ATHEXCSD. [The interested Listed Issuers shall notify ATHEX regarding the possibility of receipt by ATHEXCSD of all the above from 1 to 9].
11. After completion of the allocation phase, completion and submission to ATHEXCSD of the Beneficiary Allocation File according to ATHEXCSD procedures, in electronic and paper form, signed by the legal representatives of the company, as well as a certificate of the company that the data included in the list fully match those of the allocation file that was submitted.
12. Letter from the company certifying fulfilment of its financial obligations to ATHEXCSD.

III. Supporting documents for use of the service for immobilization of shares already issued (article 2.2.1.1, Part 2, Section IV of the Rulebook):

In order for interested Listed Issuers to use the service for immobilization of shares or other transferable securities already issued, they must submit to ATHEXCSD the following information and supporting documents:

1. Application signed by the legal representative of the company for:
 - a) the use of the service, accompanied by confirmation that the physical securities in question (shares or other transferable securities) of the interested Listed Issuer can indeed be immobilized in accordance with the legal rules applicable to them. If the

interested Listed Issuer is a foreign entity, ATHEXCSD may request a legal opinion to certify the above;

- b) the opening of a Transitory Account and Issuer Share in the DSS;
 - c) the opening of a relevant Account and Issuer Share for non-appearing beneficiaries (or non-declaration of an intermediary) under the management of ATHEXCSD, where applicable.
2. Certificate of registration of the last codified articles of association in the GCR or in another Company Registry, in the case of a foreign company, or an online search thereof, where applicable.
 3. Copy of the minutes of the meeting of the competent body of the company which decided the immobilization of physical securities (shares or other transferable securities) in dematerialized form or an online search thereof (GCR or Company Registry), where applicable. The aforesaid minutes must be submitted especially when the articles of association make no provision for the immobilization of physical securities in dematerialized form.
 4. Copy of the minutes of the meeting of the competent body of the company including its valid legal representation according to the GCR or corresponding Company Registry, as appropriate, or an online search thereof, where applicable.
 5. Application by the company for the issuance of ISIN, CFI and FISN codes.
 6. Copy of the minutes of the meeting of the competent body of the company certifying full payment of the amount of funds raised (e.g., capital increase or bond loan) or an online search thereof, if applicable.
 7. Copy of the approval decision of the Ministry of Development and its recording in the GCR or, in the case of a foreign company, of the Competent Authority and the relevant recording in the Company Registry, where required, or an online search thereof where applicable.
 8. Solemn Declaration by the company that it will provide true and accurate information for recording.
 9. Certificate requested by ATHEXCSD of the approval by the Trading Venue Operator of admission to trading of the relevant transferable securities on its Trading Venue.
 10. In case of admission to an ATHEX Trading Venue, it is sufficient that ATHEX certifies receipt of the above documents of points 1 to 9 in accordance with the procedures of ATHEX and ATHEXCSD. [The interested Listed Issuers shall notify ATHEX regarding the possibility of receipt by ATHEXCSD of all the above from 1 to 9].
 11. After the collection of the physical securities by the interested Listed Issuer, completion and submission to ATHEXCSD of the Physical Securities Immobilization File on the basis of ATHEXCSD procedures, in electronic and paper form.

IV. Supporting documents for use of the service for immobilization of newly issued physical securities (article 2.2.1.2, Part 2, Section IV of the Rulebook):

In order for interested Listed Issuers to use the service for immobilization of newly issued physical securities (shares or other transferable securities), they must submit to ATHEXCSD the information and supporting documents laid down in paragraphs 1 to 10 of Part III. Moreover, after completion of the allocation procedure, the interested Listed Issuer must:

- a) complete and submit to ATHEXCSD the Beneficiary Allocation File in accordance with ATHEXCSD procedures, in electronic and paper form, signed by the legal representatives of

the company, as well as confirmation by the company that the data included in the list fully match those of the Allocation file that was submitted;

- b) deposit the physical securities with ATHEXCSD in accordance with article 8 of Law 4569/2018.

V. Details and supporting documents for the deletion of transferable securities of Listed Issuers which have been recorded in the DSS (article 2.3, Part 2, Section IV of the Rulebook)

The deletion of transferable securities that have been recorded in the DSS requires the following:

1. In the case of voluntary deletion, an Application from the Listed Issuer stating the reasons for the deletion and the manner in which the issue will be maintained in accordance with the provisions applicable to the issue. Depending on how the issue will be maintained (e.g., by another CSD or with another recording method), the relevant actions to complete the deletion are then performed by ATHEXCSD.
2. In the case of mandatory deletion, a certificate or other document evidencing the decision of the Competent Authority or the relevant Trading Venue Operator for the deletion, on the basis of which the respective actions will be performed by ATHEXCSD to complete the deletion.
3. In the case of a Listed issuer that fails to fulfil its obligations:
 - a) A decision taken by the Board of Directors of ATHEXCSD which establishes that the Issuer has not fulfilled its obligations or that the maintenance of the transferable securities of the Listed Issuer in ATHEXCSD has become disadvantageous on the basis of a comprehensive risk analysis in accordance with the Rulebook.
 - b) Communication of the above decision to the Listed issuer by means of simple notification.

B. Supporting documents for use of the Initial Recording Service by interested Non-Listed Issuers

1. Supporting documents for use of the service for dematerialization of physical securities (articles 3.2, 3.3 of Part 3 in conjunction with article 2.1.1.1, Part 2, Section IV of the Rulebook):

In order for interested Non-Listed Issuers to use the dematerialization service with conversion of physical securities (shares or other transferable securities) into dematerialized securities, they must submit to ATHEXCSD the following information and supporting documents:

1. Application signed by the legal representative of the company **for the use of the service and for the opening of a Transitory Account and Issuer Share in the DSS, which will include:**
 - a) confirmation **of the company** that the physical securities in question (shares or other transferable securities) of the interested Non-Listed Issuer can indeed be dematerialized in accordance with the legal rules applicable to them **and that the legal status of the company and of the company's transferable securities for which the recording application is being submitted to ATHEXCSD, are in compliance with applicable laws and regulations.** If the interested Non-Listed Issuer is a foreign entity, ATHEXCSD may request a legal opinion to certify the above;
 - b) **declaration by the company that it will provide true and accurate information for recording;**
 - c) certificate confirming that the recording application relates to all transferable securities of the same category which have already been issued;
2. Certificate of registration of the last codified articles of association in the GCR or in another Company Registry, in the case of a foreign company, or an online search thereof where applicable, the articles must include the necessary provisions for the issue of securities in dematerialized or book-entry form and provide that the securities to be dematerialized are transferable and paid in full.
3. Copy of the minutes of the meeting of the competent body of the company which decided the conversion of the shares or other transferable securities into dematerialized form or an online search thereof (GCR or Company Registry), where applicable.
4. Application by the company for issuance of ISIN, CFI and FISN codes.
5. Copy of the approval decision of the Ministry of Development and its recording in the GCR or, in the case of a foreign company, of the Competent Authority and the relevant recording in the Company Registry, **of the certificate of full payment of the amount of funds raised (e.g. capital increase or bond loan),** where required, or an online search thereof where applicable. **In case such an approval decision or the relevant recording according to applicable law is not required, the copy of the minutes of the meeting of the competent body of the company that decided such certification is provided.**
6. If the Non-Listed Issuer is a legal entity that issues transferable securities in the capital market (unlisted or not eligible for admission):
 - a) certificates or other relevant documents requested by ATHEXCSD in connection with the completion of the public offering or private placement (for instance, certificates

- from underwriters, advisors or other coordinators);
- b) written justification of the reasons for non-admission.
7. If the Non-Listed Issuer does not fall under **par. 6** above but is a public limited company within the meaning of article 12 Law / 4569/2018 **copy of the latest published financial statements, if any, or an online search thereof (GCR).**
 8. After the collection of all physical securities by the interested Non-Listed Issuer, completion and submission to ATHEXCSD of the Physical Securities Conversion File in accordance with ATHEXCSD procedures, in electronic form..
 9. In addition to the above, the company shall submit the following supporting documents from the appropriate Company Registry or provide a link for an online search thereof:
 - a) General Certificate (Changes)
 - d) Detailed Certificate of Representation (Details of Representatives)
 10. **In case that it is possible to search certain of the above documents electronically in public registers (e.g. GE.MH.), where specifically foreseen above, ATHEXCSD may perform this electronic search through the aforementioned public registers without requesting from the company to submit the documents in question.¹**

II. Supporting documents for use of the dematerialization service with direct issue of shares or other transferable securities in dematerialized form (articles 3.2, 3.3 of Part 3 in conjunction with article 2.1.1.2, Part 2, Section IV of the Rulebook):

In order for interested Non-Listed Issuers to use the dematerialization service with direct issue of shares or other transferable securities in dematerialized form, they must submit to ATHEXCSD the following information and supporting documents:

1. Application signed by the legal representative of the company for **the use of the service and for the opening of a Transitory Account and Issuer Share in the DSS, which will include;**
 - a) confirmation of the company that the shares or other transferable securities in question of the interested Unlisted Issuer can indeed be dematerialized in accordance with the legal rules applicable to them **and that the legal status of the company and of the company's transferable securities for which the recording application is being submitted to ATHEXCSD, are in compliance with applicable laws and regulations.** If the interested Non-Listed Issuer is a foreign entity, ATHEXCSD may request a legal opinion to certify the above;
 - b) **declaration by the company that it will provide true and accurate information for recording;**
 - c) **certificate confirming that the recording application relates to all transferable securities of the same category which have already been issued;**
2. Certificate of registration of the last codified articles of association in the GCR or in another Company Registry, in the case of a foreign company, or an online search thereof, where applicable, the articles must include the necessary provisions for the issue of securities in dematerialized or book-entry form and provide that the securities to be dematerialized are transferable and paid in full.

¹ Article I of par. B of Chapter One was amended as above by virtue of decision 358/27.03.2024 of the Board of Directors of ATHEXCSD with effect as of 03.04.2024.

3. Copy of the minutes of the meeting of the competent body of the company which decided the issue of shares or other transferable securities in dematerialized form or an online search thereof (GCR or Company Registry), where applicable.
4. Application by the company for the issuance of ISIN, CFI and FISN codes.
5. Copy of the approval decision of the Ministry of Development and its recording in the GCR or, in the case of a foreign company, **of the certificate of full payment of the amount of funds raised (e.g. capital increase or bondloan)**, of the Competent Authority and the relevant recording in the Company Registry, where required, or an online search thereof where applicable. **In case such an approval decision or the relevant recording according to applicable law is not required, the copy of the minutes of the meeting of the competent body of the company that decided such certification is provided.**
6. If the Non-Listed Issuer is a legal entity that issues transferable securities in the capitalmarket (unlisted or not eligible for admission):
 - a) certificates or other relevant documents requested by ATHEXCSD in connection with the completion of the public offering or private placement (for instance, certificates from underwriters, advisors or other coordinators);
 - b) written justification of the reasons for non-admission.
7. If the Non-Listed Issuer does not fall under par. 6 above but is a public limited company within the meaning of article 12 Law 4569/2018 copy of the latest published financial statements, if any, or an online search thereof (GCR).
8. After completion of the allocation phase, completion and submission to ATHEXCSD of the Beneficiary Allocation File in accordance with ATHEXCSD procedures, in electronic form.
9. In addition to the above, the company shall submit the following supporting documents from the appropriate Company Registry or provide a link for an online search thereof:
 - a) General Certificate (Changes)
 - b) Detailed Certificate of Representation (Details of Representatives)
10. **In case that it is possible to search certain of the above documents electronically in public registers (e.g. GE.MH.), where specifically foreseen above, ATHEXCSD may perform this electronic search through the aforementioned public registers without requesting from the company to submit the documents in question.²**

III. Supporting documents for use of the service for immobilization of shares already issued (articles 2.2, 2.3 and art. 2.2.1.1 of Part 2, Section IV of the Rulebook):

In order for interested Non-Listed Issuers to use the service for immobilization of shares or other transferable securities already issued, they must submit to ATHEXCSD the following information and supporting documents:

1. Application signed by the legal representative of the company for **the use of the service and for the opening of a Transitory Account and Issuer Share in the DSS, which will include:**
 - a) confirmation **of the company** that the physical securities in question (shares or other transferable securities) of the interested Non-Listed Issuer can indeed be immobilized in accordance with the legal rules applicable to them **and that the legal status of the company and of the company's transferable securities for which the recording application is being submitted to ATHEXCSD, are in compliance with applicable laws and regulations.** If the interested Non-Listed Issuer is a foreign entity,

² Article II of par. B of Chapter One was amended as above by virtue of decision 358/27.03.2024 of the Board of Directors of ATHEXCSD with effect as of 03.04.2024.

- ATHEXCSD may request a legal opinion to certify the above;
- b) declaration by the company that it will provide true and accurate information for recording;
 - c) certificate confirming that the recording application relates to all transferable securities of the same category which have already been issued;
2. Certificate of registration of the last codified articles of association in the GCR or in another Company Registry, in the case of a foreign company, or an online search thereof, where applicable, the articles must include the necessary statutory regulations for the issue of securities in immobilized book-entry form and provide that the securities to be immobilized are transferable and paid in full.
 3. Copy of the minutes of the meeting of the competent body of the company which decided the immobilization of physical securities (shares or other transferable securities) or an online search thereof (GCR or Company Registry), where applicable.
 4. Application by the company for the issuance of ISIN, CFI and FISN codes.
 5. Copy of the approval decision of the Ministry of Development and its recording in the GCR or, in the case of a foreign company, of the certificate of full payment of the amount of funds raised (e.g. capital increase or bond loan), of the Competent Authority and the relevant recording in the Company Registry, where required, or an online search thereof where applicable. In case such an approval decision or the relevant recording according to applicable law is not required, the copy of the minutes of the meeting of the competent body of the company that decided such certification is provided.
 6. If the Non-Listed Issuer is a legal entity that issues transferable securities in the capital market (unlisted or not eligible for admission):
 - a) certificates or other relevant documents requested by ATHEXCSD in connection with the completion of the public offering or private placement (for instance, certificates from underwriters, advisors or other coordinators);
 - b) written justification of the reasons for non-admission.
 7. If the Non-Listed Issuer does not fall under par. 6 above but is a public limited company within the meaning of article 12 Law 4569/2018 copy of the latest published financial statements, if any, or an online search thereof (GCR).
 8. After collection of the physical securities by the interested Non-Listed Issuer, completion and submission to ATHEXCSD of the Physical Securities Immobilization File in accordance with ATHEXCSD procedures, in electronic and paper form, signed by the legal representatives of the company, as well as a certificate of the company confirming that the data included in the list fully match those of the Allocation File that was submitted.
 9. In addition to the above, the Company shall submit the following supporting documents from the appropriate Company Registry and submit them to ATHEXCSD or provide a link for an online search thereof:
 - a) General Certificate (Changes)
 - b) Detailed Certificate of Representation (Details of Representatives)
 10. In case that it is possible to search certain of the above documents electronically in public registers (e.g. GE.MH.), where specifically foreseen above, ATHEXCSD may perform this electronic search through the aforementioned public registers without requesting from the company to submit the documents in question.³

³ Article III of par. B of Chapter One was amended as above by virtue of decision 358/27.03.2024 of the Board of Directors of ATHEXCSD with effect as of 03.04.2024.

IV. Supporting documents for use of the service for immobilization of newly issued physical securities (articles 3.2, 3.3 of Part 3 in conjunction with article 2.2.1.2 of Part 2, Section IV of the Rulebook):

1. In order for interested Non-Listed Issuers to use the service for immobilization of newly issued physical securities (shares or other transferable securities), they must submit to ATHEXCSD the information and supporting documents laid down in paragraphs 1 to 7 of Part III.
2. Moreover, after completion of the allocation procedure, the interested Non-Listed Issuer must complete and submit to ATHEXCSD the Beneficiary Allocation File in accordance with ATHEXCSD procedures, in electronic form.
3. In addition to the above, the Company shall submit the following supporting documents from the appropriate Company Registry or provide a link for an online search thereof:
 - a) General Certificate (Changes)
 - b) Detailed Certificate of Representation (Details of Representatives)
4. In case that it is possible to search certain of the above documents electronically in public registers (e.g. GE.MH.), where specifically foreseen above, ATHEXCSD may perform this electronic search through the aforementioned public registers without requesting from the company to submit the documents in question.⁴

V. Supporting documents in cases where a beneficiary does not declare a Participant during procedures for the dematerialization or immobilization of Securities of a Non-Listed Issuer (article 3.3, Part 3, Section IV of the Rulebook):⁵

In order for interested Non-Listed Issuers to use the service for dematerialization or immobilization of Securities in accordance with Part 3, Section IV of the Rulebook, in respect of which the terms of paragraphs 2 and 3 of article 3.3, Part 3 of the Rulebook are fulfilled, the interested Non-Listed Issuers must submit to ATHEXCSD the following information and supporting documents:

1. Application signed by the legal representative of the company for the opening of a Securities Account in the Share of the applicant Issuer in the DSS, under the management of a Participant designated by the company, on behalf of beneficiaries that do not have a Share in the DSS or no Client Securities Account has been opened in the DSS or no Clients Securities Account has been declared for the relevant Securities of the beneficiaries.
2. Copy of the minutes of the meeting of the competent body of the company by virtue of which the latter decides the following:
“Within the framework of using the initial recording service in accordance with Part 3, Section IV of the ATHEXCSD Rulebook and in cases where a beneficiary or beneficiaries of the company’s securities do not have a Share in the DSS or no Client Securities Account has been opened in the DSS or no Clients Securities Account has been declared for the relevant Securities of the beneficiaries, the company shall designate a Participant or Participants to perform the

⁴ Article IV of par. B of Chapter One was amended as above by virtue of decision 358/27.03.2024 of the Board of Directors of ATHEXCSD with effect as of 03.04.2024.

⁵ A new article V was added as above by virtue of decision 325/31.01.2022 of the Board of Directors with effect as of 01.02.2022.

following actions:

- a) opening of a Securities Account in the Issuer Share of the company with recording of the beneficiary's details as provided by the Issuer;*
- b) following this and in accordance with ATHEXCSD procedures, transfer of the beneficiary's Securities from the Transitory Account to the Securities Account of the Issuer Share under a) above.*

In addition, the company declares that:

- a) it accepts that the aforementioned Securities Account of the Issuer Share will be deleted upon transfer of the balance of Securities to the Securities Accounts declared for beneficiaries;*
- b) the aforesaid Securities shall be declared in the relevant Securities Account of the Issuer Share until their transfer to Securities Accounts declared for beneficiaries."*

The above-mentioned minutes may also be sought online (GCR or Company Registry), where applicable.

VI. Details and supporting documents for the deletion of transferable securities of Non-Listed Issuers which have been recorded in the DSS (article 3.4, Part 3, Section IV of the Rulebook)

The deletion of transferable securities that have been recorded in the DSS requires the following:

1. In the case of voluntary deletion, an Application from the Non-Listed Issuer, stating the reasons for the deletion and the manner in which the issue will be maintained in accordance with its statutory regulations. Depending on how the issue will be maintained (e.g., by another CSD or with another recording method), the relevant actions to complete the deletion are then performed by ATHEXCSD.
2. In the case of mandatory deletion due to bankruptcy or other insolvency of the Non-Listed Issuer, submission of evidence (court documents) or certificate from a receiver or equivalent duly authorized body confirming that the Non-Listed Issuer has been declared bankrupt or insolvent, on the basis of which ATHEXCSD will carry out the necessary actions for completion of the deletion.
3. In the case of a Non-Listed issuer that fails to fulfil its obligations :
 - a) A decision taken by the Board of Directors of ATHEXCSD which establishes that the Issuer has not fulfilled its obligations or that the maintenance of the transferable securities of the Non-Listed Issuer in ATHEXCSD has become disadvantageous on the basis of a comprehensive risk analysis in accordance with the Rulebook.
 - b) Communication of the above decision to the Non-Listed issuer by means of simple notification.

C. Supporting documents for use of the Initial Recording Service by interested Exchange-Traded Fund Managers

I. Supporting documents for use of the service for dematerialization of ETF units (article 4.2, Part 4, Section IV of the Rulebook):

In order for interested Exchange-Traded Fund Managers to use the service for dematerialization of ETF units, they must submit to ATHEXCSD the following information and supporting documents:

1. Application signed by the legal representative of the company of the Exchange-Traded Fund

Manager for:

- a) the use of the service, accompanied by confirmation that the units in question can indeed be dematerialized in accordance with the legal rules applicable to them, with reference to the approved maximum number of units to be issued. If the interested Exchange-Traded Fund Manager is a foreign entity, ATHEXCSD may request a legal opinion to certify the above;
 - b) the opening of a Transitory Account and FundManager Share in the DSS;
 - c) the opening of a Securities Account and Fund Share for therelevant Exchange-Traded Fund, where applicable.
2. License to establish the Exchange-Traded Fund from the competent supervisory authority.
 3. Copy of the Exchange-Traded Fund's Rulebook.
 4. Certificate of registration of the last codified articles of association in the GCR or in another Company Registry, in the case of a foreign Exchange-Traded Fund Manager, or an online search thereof, where applicable.
 5. Copy of the minutes of the meeting of the competent body of the company of the Exchange-Traded Fund Manager which decided the issuance of the units in dematerialized form or an online search thereof (GCR or Company Registry), where applicable.
 6. Copy of the minutes of the meeting of the competent body of the company of the Exchange-Traded Fund Manager including its valid legal representation according to the GCR or the corresponding Company Registry, as appropriate, or an online search thereof, where applicable.
 7. Application by the Exchange-Traded Fund Manager for the issuance of ISIN, CFI and FISN codes.
 8. Solemn Declaration by the Exchange-Traded Fund Manager that it will provide true and accurate information for recording.
 9. Certificate requested by ATHEXCSD of the approval by the Trading Venue Operator of admission to trading of the relevant units on its Trading Venue.
 10. In the case of admission to an ATHEX Trading Venue, it is sufficient that ATHEX certifies receipt of the above documents of points 1 to 7 in accordance with the procedures of ATHEX and ATHEXCSD. [The interested Exchange-Traded Fund Managers shall notify ATHEX regarding the possibility of receipt by ATHEXCSD of all the above from 1 to 7].
 11. Letter from the company certifying fulfilment of its financial obligations to ATHEXCSD.
 12. After completion of the allocation phase (or collection of the entries with the details of the unit-holders and units), completion and submission to ATHEXCSD of the Beneficiary Allocation File according to ATHEXCSD procedures, in electronic and paper form, signed by the legal representatives of the company, as well as a certificate of the company confirming that the data included in the list fully match those of the Allocation File that was submitted.

II. *Supporting documents for use of the service for immobilization of units already issued or newly issued (article 4.3, Part 4, Section IV of the Rulebook):*

In order for interested Exchange-Traded Fund Managers to use the service for immobilization of units already issued or newly issued, they must submit to ATHEXCSD the following supporting documents:

1. Application signed by the legal representative of the company of the Exchange-Traded Fund Manager for:

- a) the use of the service, accompanied by confirmation that the physical units can indeed be immobilized in accordance with the legal rules applicable to them, with reference to the approved maximum number of units to be issued. If the interested Exchange-Traded Fund Manager is a foreign entity, ATHEXCSD may request a legal opinion to certify the above;
 - b) the opening of a Transitory Account and Fund Manager Share in the DSS;
 - c) the opening of a Securities Account and Fund Share for the relevant Exchange-Traded Fund, where applicable.
2. License to establish the Exchange-Traded Fund from the competent supervisory authority.
 3. Copy of the Exchange-Traded Fund's Rulebook.
 4. Certificate of registration of the last codified articles of association in the GCR or in another Company Registry, in the case of a foreign Exchange-Traded Fund Manager, or an online search thereof, where applicable.
 5. Copy of the minutes of the meeting of the competent body of the company of the Exchange-Traded Fund Manager which decided the immobilization of the physical units or an online search thereof (GCR or Company Registry), where applicable.
 6. Copy of the minutes of the meeting of the competent body of the company of the Exchange-Traded Fund Manager including its valid legal representation according to the GCR or the corresponding Company Registry, as appropriate, or an online search thereof, where applicable.
 7. Application by the Exchange-Traded Fund Manager for the issuance of ISIN, CFI and FISN codes.
 8. Solemn Declaration by the Exchange-Traded Fund Manager that it will provide true and accurate information for recording.
 9. Certificate requested by ATHEXCSD of the approval by the Trading Venue Operator of admission to trading of the relevant units on its Trading Venue.
 10. In the case of admission to an ATHEX Trading Venue, it is sufficient that ATHEX certifies receipt of the above documents of points 1 to 7 in accordance with ATHEX and ATHEXCSD procedures. [The interested Exchange-Traded Fund Managers shall notify ATHEX regarding the possibility of receipt by ATHEXCSD of all the above from 1 to 7].
 11. Letter from the company certifying fulfilment of its financial obligations to ATHEXCSD.
 12. After the phase of collection of the physical units is completed by the interested Exchange-Traded Fund Manager, completion and submission to ATHEXCSD of the Physical Securities Immobilization File or the Beneficiary Allocation File according to ATHEXCSD procedures, in electronic and paper form, signed by the legal representatives of the company, as well as a certificate of the company confirming that the data included in the list fully match those of the Immobilization or Allocation File that was submitted.

III. *Details and supporting documents for the deletion of Exchange-Traded Fund units that have been recorded in the DSS (article 4.5, Part 4, Section IV of the Rulebook)*

The deletion of Exchange-Traded Fund units that have been recorded in the DSS (apart from cases of deletion of units as a consequence of redemption pursuant to article 4.4.2, Part 4, Section IV of the Rulebook) requires the following:

1. In the case of voluntary deletion, an Application from the Exchange-Traded Fund Manager, stating the reasons for the deletion and the manner in which the issue will be maintained in accordance with the regulations applicable to the issue. Depending on how the issue will be maintained (e.g., by another CSD or with another recording method), the relevant actions to complete the deletion are then performed by ATHEXCSD.
2. In the case of mandatory deletion, a certificate or other document evidencing the decision of the Competent Authority or relevant Trading Venue Operator for the deletion, on the basis of which ATHEXCSD will carry out the necessary actions for completion of the deletion.
3. In the case of an Exchange-Traded Fund Manager that fails to fulfil its obligations:
 - a) a decision taken by the Board of Directors of ATHEXCSD which establishes that the Exchange-Traded Fund Manager has not fulfilled its obligations or that the maintenance of the ETF units of the relevant Exchange-Traded Fund in ATHEXCSD has become disadvantageous on the basis of a comprehensive risk analysis in accordance with the Rulebook;
 - b) Communication of the above decision to the Exchange-Traded Fund Manager by means of simple notification.

D. Supporting documents for use of the Initial Recording Service by interested Non-Exchange-Traded Fund Managers

1. Supporting documents for use of the service for dematerialization of units (articles 5.1, 5.2, 5.3 of Part 5, Section IV of the Rulebook):

In order for interested Non-Exchange-Traded Fund Managers to use the Service for dematerialization of Non-Exchange-Traded Fund units, they must submit to ATHEXCSD the following information and supporting documents:

1. Application signed by the legal representative of the company of the Non-Exchange-Traded Fund Manager for:
 - a) the use of the service, accompanied by confirmation that the units in question can indeed be dematerialized in accordance with the legal rules applicable to them, with reference to the approved maximum number of units. If the interested Exchange-Traded Fund Manager is a foreign entity, ATHEXCSD may request a legal opinion to certify the above;
 - b) the opening of a Transitory Account and Fund Manager Share in the DSS;
 - c) the opening of a Securities Account and Fund Share for the relevant Non-Exchange-Traded Fund, where applicable.
2. License to establish the Non-Exchange-Traded Fund from the competent supervisory authority.
3. Copy of the Non-Exchange-Traded Fund's Rulebook.
4. Certificate of registration of the last codified articles of association in the GCR or in another Company Registry, in the case of a foreign Non-Exchange-Traded Fund Manager, or an online search thereof, where applicable.
5. Certificate based on the articles of association or regulatory provisions of the Non-Exchange-Traded Fund relating to the issue of units in dematerialized form and a relevant provision stipulating that the units to be dematerialized are subject to creation or redemption

- procedures or are transferable, where applicable, pursuant to the law establishing them.
6. Copy of the minutes of the meeting of the competent body of the company of the Non-Exchange-Traded Fund Manager which decided the issuance of units in dematerialized form or an online search thereof (GCR or Company Registry), where applicable.
 7. Copy of the minutes of the meeting of the competent body of the company of the Non-Exchange-Traded Fund Manager including its valid legal representation according to the GCR or the corresponding Company Registry, as appropriate, or an online search thereof, where applicable.
 8. Application by the Non-Exchange-Traded Fund Manager for the issuance of ISIN, CFI and FISN codes.
 9. Solemn Declaration by the Non-Exchange-Traded Fund Manager that it will provide true and accurate information for recording.
 10. Certificates or other relevant documents requested by ATHEXCSD concerning the sale of units and written justification of the reasons for non-admission.
 11. Certificates or other relevant documents requested by ATHEXCSD of the legal status of the Non-Exchange-Traded Fund Manager, evidencing its compliance with applicable laws and regulations.
 12. Certificate of the legal status of the units for which the application for recording in ATHEXCSD is being submitted, namely that the units are in compliance with the laws and regulations applicable to them.
 13. Certificate confirming that the recording application relates to all units of the same category which are issued (already issued / to be issued - created).
 14. Letter from the company certifying fulfillment of its financial obligations to ATHEXCSD.
 15. After the collection of the entries with the details of unit-holders and units, completion and submission to ATHEXCSD of the Beneficiary Allocation File according to ATHEXCSD procedures, in electronic and paper form, signed by the legal representatives of the company, as well as a certificate of the company confirming that the data included in the list fully match those of the Allocation File that was submitted.

II. *Supporting documents for use of the service for immobilization of units already issued or newly issued (article 5.4, Part 5, Section IV of the Rulebook):*

In order for interested Non-Exchange-Traded Fund Managers to use the service for immobilization of units of Non-Exchange-Traded Funds which have already been issued in physical form or are newly issued, they must submit to ATHEXCSD the following supporting documents:

1. Application signed by the legal representative of the company of the Non-Exchange-Traded Fund Manager for:
 - a) the use of the service, accompanied by confirmation that the units in question can indeed be immobilized in accordance with the legal rules applicable to them, with reference to the approved maximum number of units; If the interested Non-Exchange-Traded Fund Manager is a foreign entity, ATHEXCSD may request a legal opinion to certify the above;
 - b) the opening of a Transitory Account and Fund Manager Share in the DSS;
 - c) the opening of a Securities Account and Fund Share for the relevant Non-Exchange-Traded Fund, where applicable.

2. License to establish the Non-Exchange-Traded Fund from the competent supervisory authority.
3. Copy of the Non-Exchange-Traded Fund's Rulebook.
4. Certificate of registration of the last codified articles of association in the GCR or in another Company Registry, in the case of a foreign Non-Exchange-Traded Fund Manager, or an online search thereof, where applicable.
5. Certificate based on the articles of association or regulatory provisions of the Non-Exchange-Traded Fund relating to the issue of units in immobilized book-entry form and a relevant provision stipulating that the units to be immobilized are subject to creation or redemption procedures or are transferable, where applicable, pursuant to the law establishing them.
6. Copy of the minutes of the meeting of the competent body of the company which decided the immobilization of the units or an online search thereof (GCR or Company Registry), where applicable.
7. Copy of the minutes of the meeting of the competent body of company of the Non-Exchange-Traded Fund Manager including its valid legal representation according to the GCR or the corresponding Company Registry, as appropriate, or an online search thereof, where applicable.
8. Application by the company for the issuance of ISIN, CFI and FISN codes.
9. Solemn Declaration by the Non-Exchange-Traded Fund Manager that it will provide true and accurate information for recording.
10. Certificates or other relevant documents requested by ATHEXCSD concerning the sale of units and written justification of the reasons for non-admission.
11. Certificates or other relevant documents requested by ATHEXCSD of the legal status of the Non-Exchange-Traded Fund Manager, evidencing its compliance with applicable laws and regulations.
12. Certificate of the legal status of the units for which the application for recording in ATHEXCSD is being submitted, namely that the units are in compliance with the laws and regulations applicable to them.
13. Certificate confirming that the recording application relates to all units of the same category which are issued (already issued / to be issued - created).
14. Letter from the company certifying fulfillment of its financial obligations to ATHEXCSD.
15. After the collection of the physical units with the details of unit-holders and units, completion and submission to ATHEXCSD of the Physical Securities Immobilization File according to ATHEXCSD procedures, in electronic and paper form, signed by the legal representatives of the company, as well as a certificate of the company confirming that the data included in the list fully match those of the Immobilization File that was submitted.

III. *Details and supporting documents for the deletion of Non-Exchange-Traded Fund units that have been recorded in the DSS (article 5.6, Part 5, Section IV of the Rulebook)*

The deletion of Non-Exchange-Traded Fund units that have been recorded in the DSS (apart from cases of deletion of units as a consequence of redemption pursuant to article 4.4.2, Part 4, Section IV of the Rulebook) requires the following:

1. In the case of voluntary deletion, an Application from the Non-Exchange-Traded Fund Manager, stating the reasons for the deletion and the manner in which the issue will be

maintained in accordance with the regulations applicable to the issue. Depending on how the issue will be maintained (e.g., by another CSD or with another recording method), the relevant actions to complete the deletion are then performed by ATHEXCSD.

2. In the case of mandatory deletion due to bankruptcy or other insolvency of the Non-Exchange-Traded Fund Manager, submission of evidence (court documents) or certificate from a receiver or equivalent duly authorized body confirming that the Non-Exchange-Traded Fund Manager has been declared bankrupt or insolvent, on the basis of which ATHEXCSD will carry out the necessary actions for completion of the deletion.
3. In the case of a Non-Exchange-Traded Fund Manager that fails to fulfil its obligations:
 - a) A decision taken by the Board of Directors of ATHEXCSD which establishes that the Non-Exchange-Traded Fund Manager has not fulfilled its obligations or that the maintenance of the units of the Non-Exchange-Traded Fund Manager in ATHEXCSD has become disadvantageous on the basis of a comprehensive risk analysis in accordance with the Rulebook.
 - b) Communication of the above decision to the Non-Exchange-Traded Fund Manager by means of simple notification

CHAPTER TWO

A. Information of the Physical Securities Conversion File

The information that must be provided in the Physical Securities Conversion File by Issuers or Fund Managers is as follows:

- (a)
 - i. Details of Issuer (Listed or Non-Listed Issuer) or
 - ii. Details of Fund Manager and Exchange-Traded or Non-Exchange-Traded Fund
- (b) Details of the physical securities to be converted
- (c)
 - i. Details of beneficiaries or
 - ii. Details of the Registered Intermediaries acting on their behalf
- (d) Quantity of physical securities received per beneficiary
- (e) Separation into encumbered and unencumbered securities
- (f) Specification of Securities Accounts declared for beneficiaries (if declared) and of corresponding Participants

B. Information of the Physical Securities Immobilization File

The information that must be provided in the Physical Securities Immobilization File by Issuers or Fund Managers is as follows:

- (a)
 - i. Details of Issuer (Listed or Non-Listed Issuer) or
 - ii. Details of Fund Manager and Exchange-Traded or Non-Exchange-Traded Fund

(b) Details of the securities to be immobilized

(c)

- i. Details of beneficiaries or
- ii. Details of the Registered Intermediaries acting on their behalf

(d) Quantity of physical securities received per beneficiary

(e) Separation into encumbered and unencumbered securities

(f) Specification of Securities Accounts declared for beneficiaries (if declared) and of corresponding Participants

C. Information of Beneficiary Allocation File

The information that must be provided in the Beneficiary Allocation File by Issuero Fund Managers is as follows:

(a)

- i. Details of Issuer (Listed or Non-Listed Issuer) or
- ii. Details of Fund Manager and Exchange-Traded or Non-Exchange-Traded Fund

(b) Details of the securities to be dematerialized or immobilized

(c)

- i. Details of allocation beneficiaries or
- ii. Details of the Registered Intermediaries acting on their behalf

(d) Quantity of Securities per beneficiary

(e) Separation into encumbered and unencumbered securities

(f) Specification of Securities Accounts declared for beneficiaries (if declared) and of corresponding Participants

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Entry into force

1. This resolution shall be made public via the website www.athexgroup.gr . The resolution shall enter into force on the date of its publication i.e. 12.04.2021.
2. The publication hereof shall be subject to the formalities of article 2.6, Part 2, Section I of the Rulebook.

⁶ Part D was deleted by virtue of decision 325/31.01.2022 of the Board of Directors with effect as of 01.02.2022.