



Shareholder Engagement Policy

1. Purpose

To facilitate shareholders in the exercise of their rights and maintain an active dialogue with them in a process of shareholder engagement, the Company has adopted and implements adequate and effective mechanisms to enhance communication with them (hereinafter the “Policy / Process”).

The Policy has been drawn up in accordance with the relevant provisions of the legislative and regulatory framework in force and sets out the mechanisms of communication between shareholders and the Company. Its purpose is:

- to encourage shareholder participation in certain areas of its corporate life
- to ensure regular communication between shareholders and the Company’s management on an equal footing
- to ensure equitable treatment of shareholders’ interests
- to promote transparency and protect the corporate interest

2. General principles

In pursuing its corporate purpose, one of the Company’s basic principles is to promote dialogue between shareholders and management and facilitate the active participation of shareholders in matters of its governance. In this framework, apart from the participation of shareholders in the Annual General Meeting, the Company’s management has set as a priority the frequent and constructive engagement of shareholders in corporate affairs and the creation of opportunities for them to express their views.

In order to achieve compliance with the above, the Company on the one hand ensures that shareholders receive the necessary information that gives them equal and full knowledge, as well as an adequate understanding of company matters, and enables them to exercise their appropriate rights, as stipulated by law and the Company’s articles of association, and, on the other, that shareholders are provided with the proper tools and means of communication which encourage and facilitate the immediacy and effectiveness of communication and the development of an active and constructive dialogue with the Company’s management. Moreover, the Company provides shareholders with up-to-date information in an equitable way, in cases where changes or new issues have arisen in respect of the previous information they received.

3. Key principles

The following principles constitute the core values that shape the Company’s relations with shareholders, markets and the general public:

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- i) transparency, honesty, promptness, clarity, symmetry and respect for the principle of equality in the disclosure of information;
- ii) equal treatment with regard to the recognition and exercise of the rights of all shareholders that are in the same situation and are not affected by any conflict of interest or competition;
- iii) protection of the rights and legitimate interests of all shareholders;
- iv) implementation of a general communication strategy for financial, non-financial and corporate information through the reporting and communication channels foreseen in this Policy, which contributes to the maximization of disclosure and the quality of information provided to the market, investors and other stakeholders;
- v) promotion of the constant and continuous flow of information to shareholders, and not only after an invitation to the general meetings of shareholders, by providing the latter with effective channels so they can keep fully up to date regarding the proposed resolutions that are expected to be submitted for their consideration, as well as for the reporting of any conduct which may entail a breach of the Governance System;
- vi) timely and open dialogue with stakeholders and the use of different communication channels for each group of stakeholders, based on flexibility and in order to facilitate an understanding of respective interests;
- vii) development of information technology tools that enable the Company to fully utilize new technologies, keeping it in the front line of the use of new channels of communication, and
- viii) compliance with the provisions of law and the Governance System, as well as with the principles of transparency and cooperation with all competent authorities, regulatory authorities and government services.

The above principles apply to the Company's provision of information to and communication with shareholders, institutional investors and other stakeholders, such as management organizations and custodians of the Company's shares, financial analysts, regulatory and supervisory bodies, rating agencies, news agencies, proxy advisors, etc.

Without prejudice to the principles of equal treatment and non-discriminatory treatment, the Company may make adjustments to the general and specific channels of communication and other reporting and communication initiatives that are geared to the different groups for which they are intended.

4. Competent representatives for investment relations and relations with shareholders

Responsibility for providing shareholders with direct and accurate information on the basis of equality, as well as the necessary support, in matters pertaining to the exercise of their rights, falls within the exclusive purview of the Chairperson, the Chief Executive Officer, the Chief Financial Officer and the Investor Relations Department.

No other officer or employee is a valid channel of interaction with shareholders, investors or analysts, and consequently they have neither the duty nor the power to interact with shareholders, unless this is specifically requested by one of the aforementioned official representatives. In the event that a shareholder, investor or analyst communicates spontaneously with officers other than those specified above, the latter are obliged to forward the relevant inquiry to the Investor Relations Department which will then take up the matter.

5. Scope of application and channels of communication

Except as provided by law and the Governance System, the active participation of shareholders in accordance with the provisions of this Policy is limited to the areas of corporate governance of the Company.

The active participation of shareholders in the Company shall in no way serve as a cover for conduct that is contrary to the corporate interest or that seeks the fulfilment of personal and individual interests not aligned therewith.

The Company establishes channels of participation through which it promotes the involvement of its shareholders with the appropriate guarantees and coordination mechanisms and shall endeavor to fully utilize new technologies that allow it to maintain contact and dialogue with as many of them as possible.

The Company has in place the following channels for shareholder participation in corporate life:

5.1 General Meeting of Shareholders

The General Meeting of Shareholders is the main channel for shareholder participation in corporate life. All duly accredited shareholders have the right to attend the General Meeting of Shareholders, with no minimum number of shares being required for this purpose. If it is the Annual General Meeting, additional presentations may be made to shareholders.

The Board of Directors encourages the informed and responsible participation of shareholders in the General Meeting and promotes two-way interaction with them through the other participation channels in order to become aware of their opinions and concerns and take them into account when drawing up the agenda, preparing the items for discussion and making decisions regarding other details and circumstances in connection with the holding of the General Meeting of Shareholders.

To maximize the fully informed participation of shareholders in the General Meeting, the Company puts in place mechanisms for the timely publication of the invitation to it, which shall at a minimum include information concerning the date, venue, proposed agenda and a precise description of the procedures for shareholder participation and voting.

All documents relating to the General Meeting and agenda items shall be made available in good time to shareholders in Greek and English and in electronic form.

Sessions held in person shall take place on premises that offer optimal conditions for their holding and attendance, with a high capacity at the place of the Company's registered office. The Company shall provide appropriate means to facilitate entry to and exit from the aforesaid premises. The Board of Directors shall also actively promote shareholder participation in the General Meeting, pursuant to the provisions of law and the Governance System. For such purposes, it shall facilitate access to documents pertaining to the General Meeting of Shareholders and the understanding of information relating to those matters that are to be addressed at the meeting.

Similarly, the Company's innovation and digital transformation strategy, which affects all of its businesses and activities, including corporate governance practices, promotes not only the digitalization of the General Meeting itself as an event, but also of the means made available for shareholders to participate, by promoting and facilitating the use of online channels and smart devices.

Lastly, the Company may also offer live broadcast of the Annual General Meeting of Shareholders with translation into English.

5.2 Investor Relations Department

The Investor Relations Department facilitates the Company's communication with shareholders and oversees the proper operation of the means and tools for communication between shareholders and the Company's management, as foreseen in this Policy / Process.

The IR Department promotes dialogue with shareholders and investors as an essential aspect of corporate value. The goal is to support capital market stakeholders so that they can form a true and fair picture of the Company's financial position and make an accurate evaluation of the Company.

In addition, the IR Department functions as an open, permanent and transparent channel of communication with all of the Company's shareholders, through the continuous development of initiatives to strengthen this relationship, so that shareholders can be constantly informed and submit proposals on the Company's management.

The IR Department responds at any time to the queries, questions or proposals of shareholders by telephone and e-mail (investor-relations@athexgroup.gr or ir@athexgroup.gr) and is in contact with shareholders who have voluntarily registered their names in its database.

5.3 Corporate website

The corporate website (www.athexgroup.gr) is one of the most important means for channeling the Company's relations with all its stakeholders, encouraging their engagement in corporate life, reinforcing the sense of belonging, promoting the development of the Group's businesses and their digital transformation, and demonstrating the Company's commitment to the objectives and values of ATHEX Group.

The Company uses its corporate website to provide adequate and equal access to information of interest to shareholders, investors and the markets in general, enabling the immediate disclosure of information and the capacity for subsequent access to it, thereby contributing to transparency, which is a core value for the strengthening of the Company's relations with markets and the general public. For these purposes, information is provided simultaneously and constantly updated in Greek and English.

5.4 Social media

In recent years, social media have become an increasingly important channel for communication and the dissemination of information. Being aware of this and of the importance of its presence in digital media, the Company promotes its engagement in social media as a communication channel in order to encourage the participation and reinforce the sense of belonging among its stakeholders, bearing always in mind the limitations and risks that arise from the dissemination of information via these media.

6. Process of shareholder communication with the Company

The IR Department receives questions, requests, opinions and concerns from shareholders which relate to the Company's operation and governance in general, and is responsible for responding on a continuous and individual basis to inquiries from analysts and institutional investors via the department's e-mail address.

The Head of the IR Department evaluates the aforesaid incoming messages and, in cases where they touch on an important issue for the Company's operation or if deemed necessary for some other reason, they are forwarded to the Chief Financial Officer and the Chief Executive Officer for further consideration and an appropriate response. Where necessary, the shareholder will first be contacted so that the matter may be discussed, questions submitted or further clarifications requested. In the context of such communication, the assistance of one or more management officers of the Company may be requested, while in some cases the

entire communication may be assigned to such persons. Following the aforesaid communication, the IR Department will reply to the relevant request.

If the question, request, etc. does not constitute an important issue, the Head of the IR Department will personally respond to the shareholder. Depending on the case in question, the Head of the IR Department may seek the opinion and guidance of other organizational units of the Company before responding to the shareholder.

For the purposes of this Process, an important issue is considered to be any matter that may be raised by a shareholder of the Company and relates to his/her rights as a shareholder and/or to the business activity of the Company and has particular importance for the Company's operation.

7. Periodic communication of the Company with shareholders

The Chief Executive Officer communicates with the Company's shareholders from time to time. The CEO contacts or sends a letter every six months to shareholders with shares representing more than 5% of share capital. In the framework of this communication, the aforesaid shareholders are asked to submit any individual observation or concern in connection with their rights and/or the Company. At the same time, the letter may also contain specific questions to shareholders, which have been raised by members of the Board of Directors, whenever this is deemed necessary.

The letter is sent to the contact address which has been provided to the Company by the shareholder and is kept in the records of the IR Department.

If there are replies to the letter, the CEO evaluates them and may, if they touch on matters with particular importance for the operation of the Company, invite the shareholders to take part in an interactive discussion to examine the relevant concerns along with any other matters of more general interest to them. This discussion may also take place by electronic means and include the participation of other shareholders, members of the Board of Directors, officers of the IR Department or other officers of the Company.

After completion of the discussion, the Board of Directors is informed of its results and conclusions by the CEO, who may – if deemed necessary – recommend that the Board take a decision on the matters of particular importance highlighted during the discussion with the shareholders, which also includes – where necessary – measures for resolving the relevant issues.

8. Events and meetings with investors and analysts

The Company organizes meetings for promotional and information purposes, on matters relating to the Company itself and the Group, for analysts and institutional investors to provide them with appropriate information in this regard. Such meetings are held in strict compliance with the principle of equal treatment of all shareholders that are in the same situation and are not affected by any conflict of interest or competition.

The publication of interim and annual financial reports is followed by a teleconference with the participation of analysts and investors. The IR Department actively takes part in meetings between two persons and in group meetings with investors and analysts, as well as in conferences and roadshows for investors. In addition to announcements and postings on its website, the Company strives to maximize the information provided to shareholders and investors with regard to the business environment and management strategies through one-on-one meetings, site visits, segment-specific briefings and other such communication opportunities. Selected officers of the Group are able to meet investors and analysts from time to time, for example in the context of Analyst Information Days, events that are occasionally organized hosted by the Company.

9. Review and approval of the Policy / Process

The mechanisms for communication with shareholders are assessed with regard to their adequacy and effectiveness by the Board of Directors annually, so that it may decide whether any amendments are required.