



NOTICE

of the Ordinary General Meeting

of shareholders of

"ALPHA TRUST HOLDINGS S.A."

General Commercial Registry No. 882401000

- I. Pursuant to the Law and the Articles of Association, the Board of Directors of the company under the name "ALPHA TRUST HOLDINGS S.A." and the distinctive title "ALPHA TRUST HOLDINGS" (hereinafter the "Company") invites all shareholders of the Company to participate in the Ordinary General Meeting, on Wednesday, May 15th, 2024, at 17:00 at the Company's offices in Kifissia, 21, Tatoiou Street, Postal Code 145 61, in order to discuss and resolve on the following agenda items:
1. Submission and approval of the annual Financial Statements for the financial year 01.01.2023 - 31.12.2023, including the reports of the Board of Directors and the Auditor.
 2. Approval of the distribution of profits of 2023 and previous fiscal years and distribution of dividend.
 3. Approval of the overall management of the members of the Board of Directors during the financial year 01.01.2023 - 31.12.2023, pursuant to article 108 of Law 4548/2018 and discharge of the Company's Auditors from any liability for the activities of the financial year 01.01.2023 - 31.12.2023, pursuant to article 117 par. 1 c) of law 4548/2018.
 4. Election of the new Board of Directors and appointment of its independent members.
 5. Determination of the type of the Audit Committee and the term of office, number and qualifications of its members pursuant to article 44 of Law 4449/2017 - Election of new members of the Audit Committee - Determination of the remuneration of the members of the Audit Committee.
 6. Appointment of an audit firm of Certified Public Accountants Auditors for the regular and tax audit of the current fiscal year 01.01.2024 - 31.12.2024 and determination of their fees.
 7. Submission and voting of the Audit Committee's Activity Report for the fiscal year 2023.
 8. Determination of the remuneration of the members of the Board of Directors - Approval of the remuneration of the members of the Board of Directors for the previous fiscal year and pre-approval of the remuneration of the members of the Board of Directors for the current fiscal year and the first half of the next fiscal year.

9. Free distribution of own shares to members of the Board of Directors and the personnel of the Company, pursuant to the provisions of article 114 of Law 4548/2018. Relevant authorizations to the Board of Directors.
10. Permission, pursuant to Article 98 par.1 of Law.4548/2018 and Article 27 of the Company's Articles of Association, to the members of the Board of Directors of the Company to perform, on their own account or on behalf of third parties, acts falling within the purposes of the Company, as well as to participate as general partners or as sole shareholders or partners in companies pursuing such purposes.
11. Submission of the Report of the Independent Non-Executive Members of the Board of Directors pursuant to Article 9 para. 5 of Law 4706/2020.
12. Submission for discussion and voting of the Remuneration Report pursuant to article 112 of Law 4548/2018 for the fiscal year 2023.
13. Amendment of the Suitability Policy for the members of the Board of Directors.
14. Amendment of the Remuneration Policy.
15. Miscellaneous

In case of postponement or cancellation or failure to achieve the quorum required by law for all or certain items on the agenda, at the meeting of May 15th 2024, all shareholders are invited to a Repeated General Meeting, on May 22nd, 2024, Wednesday, at the same place and time, i.e. at the Company's offices in Kifissia, 21 Tatoiou Street, Postal Code 145 61, at 17:00, to discuss and resolve on the same agenda items. It is noted that no new notice for the Repetitive General Meeting will be published, in accordance with article 130 par. 2 c' of Law 4548/2018, as in force.

II. Furthermore, pursuant to Articles 121, 123, 124, 128 and 141 of Law 4548/2018, the Company informs the Shareholders of the following:

A. RIGHT TO PARTICIPATE AND VOTE IN THE GENERAL MEETING

All natural or legal persons who have the shareholding status at the beginning of the fifth (5th) day prior to the date of the Ordinary General Meeting, i.e. the date of May 10th, 2024 ("Record Date"), are entitled to participate and vote at the General Meeting.

For the Repeated Ordinary General Meeting of May 22nd, 2024, shareholding status must also exist at the beginning of the 5th day prior to the date of the original meeting (Record Date) (Article 124 par.6 of Law 4548/2018), i.e. on May 17th, 2024, given that the date of the repeated meeting is not more than thirty (30) days from the original meeting.

As shareholders of the Company with the right to participate and vote on the General Meeting are considered those who are registered on the Record Date in the Dematerialised Securities System of the société anonyme "Greek Central Securities Depository SA". or those who are identified as such on the basis of the relevant date through registered intermediaries or other intermediaries in compliance with the provisions of the legislation (Law 4548/2018, Law 4569/2019, Law 4706/2020 and Regulation (EU) 2018/1212) as well as the Rulebook of the Hellenic Central Securities Depository (Government Gazette B/1007/16.03.2021).

Proof of shareholding status may be provided by any legal means and in any case on the basis of information received by the Company up to and prior to the commencement of the General Meeting from the Central Securities Depository, as long as it provides registry services, or through the participants and the registered intermediaries in the Central Securities Depository in any other case. A shareholder may participate in the General Meeting on the basis of confirmations or notices pursuant to Articles 5 and 6 of Regulation (EU) 2018/1212 provided by the intermediary, unless the Meeting refuses such participation for a material cause that justifies its refusal in compliance with the applicable provisions (article 19 paragraph 1 of Law 4569/2018, article 124 paragraph 5 of Law 4548/2018).

Each common share of the Company entitles the holder to one (1) vote at the General Meeting.

The participation and exercise of voting rights at the Ordinary General Meeting and at any Repeated General Meeting does not require the pledging of the beneficiary's shares or the observance of any other similar procedure, which limits the right of selling and transferring them during the period between the Record Date and the date of the General Meeting.

Shareholders who do not comply with the time limit in par. 4 of article 128 of Law 4548/2018, i.e. they have not submitted in writing or by electronic means any appointment of a representative or proxy to the Company, at least forty-eight (48) hours before the date set for the General Meeting, shall participate in the General Meeting, unless the General Meeting refuses such participation for a material cause that justifies its refusal.

B. PROCEDURE FOR PARTICIPATION IN THE VOTE BEFORE THE GENERAL MEETING (POSTAL VOTE)

Shareholders may participate themselves or their representatives remotely in the voting on the items on the agenda to be held before the Ordinary General Meeting. In particular, shareholders who wish to participate remotely in the voting on the items of the agenda of the Ordinary General Meeting to be held before the General Meeting may use this possibility by completing and submitting to the Company the "Postal Vote Form", which the Company will make available on its website <https://atrust.gr/>. This form shall be sent to the Company, completed in all its fields and signed by the person entitled to participate in the General Meeting, in accordance with the specific instructions for completion, signature and submission

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included therein, either by electronic submission by e-mail to the e-mail address c.balla@alphatrust.gr, with the subject "Postal Vote Form - General Meeting of May 15, 2024", or by post to the Company's Investors Relation Unit, at the address 21, Tatoiou Street, Kifissia, Attica, Postal Code 145 61, so that it is received at least forty-eight (48) hours prior to the date of the General Meeting of Shareholders, which will take place on May 15th 2024 at 17:00 (i.e. no later than May 13th 2024 at 17:00).

Shareholders who vote as per above before the General Meeting will be counted for the formation of the quorum and majority only if the relevant votes have been received by the Company no later than May 13th, 2024 at 17:00.

Please note that shareholders wishing to appoint proxies to participate remotely in voting on the items of the General Meeting which will take place before the General Meeting may appoint up to three (3) proxies, whose appointment must be made at least forty-eight (48) hours prior to the date of the General Meeting (i.e. no later than 5:00 p.m. on May 13th 2024, as more particularly set out below. Upon expiration of this deadline, it will not be possible to participate by proxy in the voting which will be held before the General Meeting.

In the event that the quorum required by law and the Articles of Association for the discussion and resolution on the above items is not achieved, the right to participate in the Ordinary General Meeting of May 22, 2024 by postal vote shall be re-exercised, in a voting to be held before the repeated Ordinary General Meeting, by completing and submitting to the Company the "Postal Vote Form", which the Company will make available on its website <https://atrust.gr/> . This form shall be sent to the Company, completed in all its fields and signed by the person entitled to participate in the General Meeting, in accordance with the specific instructions for completion, signature and submission included therein, either by electronic submission by e-mail to c.balla@alphatrust.gr , with the subject "Postal Vote Form - General Meeting of May 22 2024", or by post to the Company's Investors Relation Unit, at the address 21, Tatoiou Street, Kifissia, Attica, Attica, Postal Code 145 61, so that it is received at least forty-eight (48) hours prior to the date of the Repeated General Meeting, which will take place on May 22nd 2024, at 17:00.

Shareholders who vote as per above before the General Meeting will be counted for the formation of the quorum and majority only if the relevant votes have been received by the Company no later than May 20th 2024 at 17:00. For the Repeated General Meeting on May 22nd, 2024, shareholders who had not appoint a proxy at the original General Meeting or shareholders who wish to replace the proxy they had appointed to participate remotely in the voting to be held before to the Repeated General Meeting, may appoint up to three (3) proxies, whose appointment must be made at least forty-eight (48) hours before the date of the Repeated General Meeting (i.e. no later than 17: 00 of May 20th 2024), as more particularly set out below. After this date, it will not be possible to participate by proxy in the voting to be held before the Repeated General Meeting.



The shareholder who is entitled to participate is requested to confirm the successful dispatch of the proxy appointment form and its receipt by the Company by calling the Investors Relations Unit (Ms. Christina Balla), at 210-6289200.

C. PROCEDURE FOR EXERCISING VOTING RIGHTS BY PROXY(S).

A shareholder participates in the General Meeting and votes either in person or by proxy. Each shareholder, natural or legal person, may appoint up to three (3) proxies for a single General Meeting or for as many Meetings as take place within a certain period of time. However, if a shareholder holds shares of the Company which appear in more than one securities account, this restriction shall not prevent such shareholder from appointing different proxies for the shares appearing in each securities account in relation to the General Meeting. The granting of a proxy is freely revocable. A proxy acting for more than one shareholder may vote differently for each shareholder.

The proxy shall vote in accordance with the shareholder's instructions, if any, and shall be required to file the voting instructions for at least one (1) year from the date of the General Meeting or, in the event of its postponement, from the date of the last repeated General Meeting at which the proxy was used. Any failure of the proxy to comply with the instructions received shall not affect the validity of the decisions of the General Meeting, even if the proxy's vote was decisive in reaching a majority, pursuant to Article 128 para. 3(c) of Law 4548/2018.

The shareholder's proxy shall disclose to the Company prior to the beginning of the General Meeting any specific facts that may be useful to the shareholders in assessing the risk of the proxy serving interests other than the shareholder's interests. For the purposes of this paragraph, a conflict of interest may arise in particular when the proxy: a) is a shareholder who controls the Company or another legal person or entity controlled by such shareholder; b) is a member of the Board of Directors or the management of the Company in general or a shareholder who controls the Company or another legal person or entity controlled by a shareholder who controls the Company, c) is an employee or auditor of the Company or of a shareholder controlling the Company or of another legal person or entity controlled by a shareholder controlling the Company; d) is the spouse or first-degree relative of one of the natural persons in cases a) to c).

Legal entities shall participate in the General Meeting through their representatives.

The appointment and the revocation or replacement of the shareholder's representative or proxy shall in any case be made in writing or by electronic means and in particular by email and shall be submitted to the Company at least forty-eight (48) hours before the date set for the General Meeting, i.e. no later than May 13th, 2024 at 17:00 for the initial Meeting and May 20th, 2024 at 17:00 for any Repeated Meeting or, in the case of shareholders identified through intermediaries, through confirmations or notices pursuant to Articles 5 and 6 of Regulation (EU) 2018/1212 provided by the intermediaries.

The Company has posted on its website <https://atrust.gr/> the form to be used for the appointment of a proxy. This form shall be completed and signed by the Shareholder and submitted to the Investors Relations Unit of the Company at 21, Tatoiou Street, Postal Code 145 61, Kifissia, Attica or at c.balla@alphatrust.gr, within the deadline indicated in the above paragraph of this Notice. The beneficiary shareholder is requested to confirm the successful dispatch of the proxy appointment form and its receipt by the Company by calling 210-6289200 (Ms. Christina Balla).

D. MINORITY RIGHTS

In view of the Ordinary General Meeting of the Company's Shareholders on May 15th, 2024, and pursuant to article 121 par. 4 a' of Law 4548/2018, detailed information regarding the rights of the shareholders described in article 141 of Law 4548/2018 are set out below:

- a) Upon request of shareholders representing one twentieth (1/20) of the paid-up share capital, the Board of Directors is obliged to include additional items in the agenda of a General Meeting that has already been convened, provided that the relevant request is received by the Board of Directors at least fifteen (15) days prior to the General Meeting, i.e. no later than April 30th, 2024. The request for the inclusion of additional items on the agenda shall be accompanied by a justification or a draft resolution for approval at the General Meeting and the revised agenda shall be published in the same manner as the previous agenda, thirteen (13) days prior to the date of the general meeting, i.e. no later than May 2nd 2024 and at the same time shall be made available to shareholders on the Company's website <https://atrust.gr/>, along with the justification or the draft resolution submitted by the shareholders. If these items are not published, the requesting shareholders shall be entitled to request the postponement of the General Meeting, pursuant to paragraph 5 of Law 4548/2018 and to make the publication themselves, as specified in the paragraph 2 of article 141 of Law 4548/2018, at the Company's expense. The Board of Directors is not obliged to include items on the agenda or to cause the publication or communication of same along with justification and drafts of the resolutions submitted by the shareholders, in accordance with the above paragraph, respectively, if the content thereof is obviously contravention of the law or good morals.
- b) Shareholders representing one twentieth (1/20) of the paid-up capital have the right, upon request, to submit draft resolutions on items included in the original or any revised agenda of the General Meeting. The relevant request must reach the Board of Directors at least seven (7) days prior to the date of the General Meeting and the draft resolutions shall be made available to the shareholders pursuant to the provisions of paragraph 3 of Article 123 of Law 4548/2018, at least six (6) days prior to the date of the General Meeting.
- c) At the request of any shareholder, submitted to the Company at least five (5) full days prior to the General Meeting, i.e. by May 9th, 2024, the Board of Directors is obliged to provide the General Meeting with the specific information requested on the Company's affairs, insofar as it is relevant to the items on the agenda. There is no obligation to provide information when the relevant information is already available

on the Company's website, in particular in the form of questions and answers. In the above case, the Board of Directors may refuse to provide the information for due substantial cause, which shall be recorded in the minutes. Such a cause may be, in the circumstances, the representation of the requesting shareholders on the Board of Directors, pursuant to Articles 79 or 80 of Law 4548/2018. In the case of this paragraph, the Board of Directors may respond uniformly to shareholder requests with the same content.

- d) At the request of shareholders representing one tenth (1/10) of the paid-up capital submitted to the Company at least five (5) full days prior to the General Meeting, i.e. by May 9th, 2024, the Board of Directors is obliged to provide the General Meeting with information on the progress of the Company's affairs and its financial situation. The Board of Directors may refuse to provide the information for due substantial cause, which shall be recorded in the minutes. Such a cause may be, in the circumstances, the representation of the requesting shareholders on the Board of Directors, pursuant to Articles 79 or 80 of Law 4548/2018, provided that the respective members of the Board of Directors have received the relevant information in an adequate manner.
- e) At the request of shareholders representing one twentieth (1/20) of the paid-up capital, voting on an item or items on the agenda shall be carried out by open ballot.
- f) Similar deadlines for the exercise of any minority rights of the shareholders apply also in the case of a repeated General Meeting.
- g) In any case, when exercising the relevant right, shareholders shall prove their shareholding status and, except for the first case of paragraph (c) above, the number of shares they hold. Proof of shareholding may be provided by any legal means and in any case on the basis of information received by the Company from the Central Securities Depository, if it provides registry services, or through the participants and registered intermediaries of the Central Securities Depository in any other case.

E. AVAILABLE DOCUMENTS AND INFORMATION

The information referred to in paras. 3 and 4 of article 123 of Law 4548/2018 and in particular:

- 1. The Notice for the convention of the General Meeting.
- 2. The total number of shares and voting rights on the date of the notice.
- 3. The proxy appointment form.
- 4. The postal vote form.
- 5. The draft resolutions on the items on the proposed agenda, as well as any draft resolutions proposed by the shareholders pursuant to Article 141 par. 3 of Law 4548/2018.
- 6. The annual Financial Statements for the financial year 01.01.2023 - 31.12.2023, including the reports of the Board of Directors and the Auditor
- 7. The CVs of the candidates for the Board of Directors
- 8. The CVs of the candidates for the Audit Committee

9. Note of the Board of Directors of the Company on the candidates for the Board of Directors, pursuant to article 18 paragraph 1 of Law 4706/2020
10. Note of the Board of Directors of the Company on the candidates for the Audit Committee
11. The Report of the Audit Committee Activity for the financial year 2023
12. The Report of the Independent Non-Executive Members of the Board of Directors pursuant to Article 9 para. 5 of Law 4706/2020
13. The Remuneration Report pursuant to article 112 of Law 4548/2018 for the financial year 2023.
14. The revised draft of the Suitability Policy for the members of the Board of Directors.
15. The revised draft of the Remuneration Policy.
16. The Board of Directors' note of the proposed amendment to the Board's Remuneration Policy.

are available in electronic form on the Company's website <https://atrust.gr/> and in hard copy at the Company's Investor Relations Unit at the Company's registered office (21, Tatoiou Street, Postal Code 145 61 Kifissia).

The Company may send to the Shareholders copies of the above forms in hard copy, free of charge, upon their request to the Company's Investor Relations Unit (c.balla@alphatrust.gr , 210-6289200, Ms. Christina Balla).

INFORMATION ON THE PROTECTION OF PERSONAL DATA

For information on the processing of your personal data and your rights under the relevant legislation, please refer at any time to the Privacy Policy, which is available on the Company's website (<https://atrust.gr/privacy-policy/>) and is updated regularly. You may also contact the Company directly by sending any relevant request to the address:

ALPHA TRUST HOLDINGS S.A.
21, Tatoiou str., Kifissia, Postal Code 145 61
info@alphatrust.gr
Tel: 210.62.89.100

For the Company

Kifissia, April 24th, 2024