

Shareholders Rights Directive II (SRD II)

Regulatory Framework

The Shareholders Rights Directive II (SRD II) Regulatory Framework, consisting of:

- Greek Law 4706/2020 on "Corporate governance of public limited companies, modern capital market, transposition into Greek law of Directive (EU) 2017/828 of the European Parliament and of the Council, measures in order to implement Regulation (EU) 2017/1131 and other provisions" and
- Commission Implementing Regulation (EU) 2018/1212, which lays down minimum requirements for the implementation of Directive (EU) 2017/828, is aimed at achieving greater transparency and enhancing shareholder participation in corporate governance and entered into force on 03/09/2020.

The rights and the obligations that derive from the SRD II Regulatory Framework are the following:

Shareholder Identification: The Issuer is entitled to know its shareholders in order to make crucial decisions or for supervisory needs, for a General Meeting and for distributions with special arrangements. For this purpose, it sends a shareholder identification request to Intermediaries in a standardized format. The first and each subsequent intermediary must respond to the identification request and forward it immediately further to the chain of intermediaries.

Transmission of Information regarding General Meetings and other Corporate Events: The Issuer is obliged to send information concerning a General Meeting or other Corporate Event to Intermediaries in a timely manner, in a standardized format and in the language in which it publishes its financial information and, also in a language customary in the sphere of international finance, unless not justified by its shareholder base. The first and each subsequent intermediary must forward immediately the information to the chain of intermediaries until it reaches the Shareholder.

General Meeting: The Shareholder instructs the Intermediary at which the respective securities are kept regarding the participation and voting in a General Meeting and the Intermediary must immediately transmit the information to the Issuer in a standardized format either directly or by using the chain of Intermediaries. The Issuer must confirm receipt of the electronic vote immediately after the voting process, as well as the recording and counting of the Shareholder's votes, in a standardized format at the shareholder's request (unless this information is already available).