SUITABILITY POLICY OF THE MEMBERS OF THE BOARD OF DIRECTORS

2nd Edition

Revisions Table

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Table of Contents

1. PURPOSE AND SCOPE 3
2. GLOSSARY OF DEFINITIONS 4
3. APPLICABLE LEGAL AND REGULATORY FRAMEWORK 5
4. KEY PRINCIPLES 6
5. GOVERNANCE – COMPETENT BODIES 7
    5.1 General Meeting (GM) 7
    5.2 Board of Directors (BoD) 7
    5.3 Nominations & Remuneration Committee (NRC) 8
    5.4 Regulatory Compliance Unit (RCU) 8
    5.5 Internal Audit Unit (IAU) 8
6. SUITABILITY ASSESSMENT CRITERIA 9
    6.1 Individual Suitability 9
        6.1.1 Adequacy of Knowledge and Skills 9
        6.1.2 Good Repute and Integrity 10
        6.1.3 Conflict of Interest 11
        6.1.4 Independence of Judgement 11
        6.1.5 Sufficient Time Commitment 11
    6.2 Collective Suitability 12
7. DIVERSITY CRITERIA 13
8. IMPLEMENTATION AND MONITORING OF THE POLICY 14
9. APPROVAL AND REVISION OF THE POLICY 14

1. PURPOSE AND SCOPE

The Suitability Policy of the Members of the Board of Directors (hereinafter the "Policy") forms part of the Corporate Governance System of the société anonyme under the corporate name "ΦΑΙΣ ΣΥΜΜΕΤΟΧΩΝ ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ" and the distinctive title "FAIS GROUP S.A." (hereinafter the "Company"). It aims at

attracting and retaining capable persons who shall ensure the exercise of sound and effective management for the benefit of the Company and all stakeholders and the achievement of its strategic objectives.

The Policy has been drawn up in accordance with Article 3 of Law 4706/2020, as in force following its amendment, in particular, by Law 5178/2025, and Circular No. 60/29.04.2025 of the Hellenic Capital Market Commission (HCMC), entitled: "Guidelines for the Suitability Policy of Article 3 of Law 4706/2020, as amended by Law 5178/2025 and in force". This Policy also incorporates the criteria and the procedure for the selection of the Members of the Board of Directors (BoD), in compliance with the percentages for the balanced representation of genders, in accordance with Articles 3A and 3B of Law 4706/2020.

The Company falls within the scope of Articles 1 to 24 of Law 4706/2020 and is therefore required to have a Suitability Policy for the Members of the Board of Directors (BoD). Furthermore, for the purposes of the balanced representation of genders on the Board of Directors (BoD), the Company falls within Article 3A par. 2 of Law 4706/2020 and not within par. 3 of the same article.

Based on the legal and regulatory framework in force, the Company ensures that the Members of the Board of Directors (BoD) at all times possess:

- (a) professional qualifications, knowledge, skills, independence of judgement, reputation and experience, so as to be able to exercise sound and consistent management, and
- (b) sufficient guarantees of good repute, reputation and integrity.

The Policy sets out the principles, criteria and procedures applied at the stages of selection, replacement and renewal of the term of the Members of the Board of Directors (BoD), including compliance with the percentages for the balanced representation of genders.

The objective of this Policy is to ensure the quality of staffing and the effective operation of the Board of Directors (BoD), so that the body fulfils its role on the basis of the overall strategy, as well as the medium-term and long-term business objectives of the Company, promoting the corporate interest.

The key objectives of this Policy are:

- The formation of a set of rules and principles relating to the selection, replacement and renewal of the term of the Members of the Board of Directors (BoD) of the Company.
- The analysis of the criteria relevant to the assessment of the suitability and integrity of the Members of the Board of Directors (BoD) and the determination of the minimum prerequisites – supporting documents that shall serve as evidence of fulfilment of such criteria.
- The reinforcement of transparency throughout the assessment of the suitability and integrity of the Members of the Board of Directors (BoD), both before they assume their position (appointment) and on a periodic basis (assessment).
- The creation of the appropriate conditions to ensure the effective and unimpeded operation of the Board of Directors (BoD) of the Company and the fulfilment of its role as the supreme body exercising management and competent for setting strategy, supervising management and providing adequate control.
- The determination of the diversity criteria, as well as of the criteria and the procedure for the selection of the Members of the Board of Directors (BoD), in compliance with the percentages for the balanced representation of genders in accordance with Articles 3A and 3B of Law 4706/2020.

- The minimisation of potential operational risks arising from the assignment of duties to unsuitable and unreliable persons.
- The determination of the cases in which it is deemed appropriate to reassess the suitability and integrity of the Members of the Board of Directors (BoD) and the procedures applied in this regard.

2. GLOSSARY OF DEFINITIONS

For the purposes of this Policy, the following definitions apply:

Term	Explanation
Suitability Policy	The set of principles, criteria and procedures applied by the Company for the selection, replacement, renewal of term and reassessment of the suitability of the Members of the Board of Directors (BoD).
Suitability	The individual and collective combination of knowledge, skills, experience, independence of judgement, integrity and reputation, so that the Members of the Board of Directors (BoD) effectively perform their duties.
Individual Suitability	The adequacy of each candidate or sitting Member of the Board of Directors (BoD), in relation to the role, responsibilities and specific characteristics of his/her position.
Collective Suitability	The adequacy of the composition of the Board of Directors (BoD) as a whole, so as to cover the required breadth of knowledge, experience and skills.
Integrity	The honesty, responsibility, integrity, ethical standing and financial soundness which should characterise every Member of the Board of Directors (BoD).
Independence of Judgement	The ability to take objective, impartial and unbiased decisions, free from undue influence or influence from a Conflict of Interest situation.
Conflict of Interest	Any situation in which the personal, professional or financial interests of a Member of the Board of Directors (BoD) may affect or appear to affect the impartial performance of his/her duties.
Diversity	The pursuit of adequate diversification in respect of gender, knowledge, experience and other characteristics that enhance the effective operation of the Board of Directors (BoD).
Under-represented Gender	The gender that falls short of the prescribed percentage of participation on the Board of Directors (BoD), in accordance with Article 3A of Law 4706/2020.
Member of the Board of Directors (BoD)	Any executive, non-executive or independent non-executive Member of the Board of Directors (BoD) of the Company.

Term	Explanation
Board of Directors (BoD)	The Board of Directors of the Company, as the highest collective body for the management and representation of the Company, in accordance with the applicable corporate and regulatory framework.
Nominations & Remuneration Committee (NRC)	The competent collective body which supports the process of selection, assessment and recommendation of candidate Members of the Board of Directors (BoD), in accordance with this Policy and its Operating Regulation.
Audit Committee (AC)	The Audit Committee of Article 44 of Law 4449/2017, as in force, to the extent connected with the operation of the Internal Control System (ICS) and the corporate governance of the Company.
Regulatory Compliance Unit (RCU)	The organisational unit of the Company which monitors the legal and regulatory framework and supports, within its remit, the updating and monitoring of the implementation of this Policy.
Internal Audit Unit (IAU)	The independent organisational unit which assesses, within the scope of its audit work, the adequacy and effectiveness of the implementation of this Policy.
Company	The société anonyme under the corporate name "ΦΑΙΣ ΣΥΜΜΕΤΟΧΩΝ ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ" and the distinctive title "FAIS GROUP S.A."

3. APPLICABLE LEGAL AND REGULATORY FRAMEWORK

The applicable legal and regulatory framework of this Policy includes, in particular, the following legislative, regulatory and internal sources:

- Law 4706/2020, as in force, in particular Articles 1 to 24 and, more specifically, Articles 3, 3A and 3B thereof,
- Law 5178/2025, by virtue of which amendments were made to the framework on the balanced representation of genders on the Board of Directors (BoD),
- Circular No. 60/29.04.2025 of the Hellenic Capital Market Commission (HCMC), entitled: "Guidelines for the Suitability Policy of Article 3 of Law 4706/2020, as amended by Law 5178/2025 and in force",
- Law 4548/2018, as the supplementary applicable corporate framework for the operation of the société anonyme and the Board of Directors (BoD),
- the Corporate Governance Code applied by the Company, the Operating Regulation of the Company and the operating regulations of the competent corporate bodies, to the extent that they are connected with this Policy.

4. KEY PRINCIPLES

The Board of Directors (BoD) shall at all times have a sufficient number of members, as defined in the Company's Articles of Association, as well as an appropriate composition.

The Policy is clear, adequately documented and governed by the principles of transparency and proportionality. Furthermore, the Policy is consistent with the Operating Regulation of the Company and the Corporate Governance Code applied by the Company, taking into account its size, internal organisation, nature, scale and complexity of activities.

The members selected to staff the Board of Directors (BoD) of the Company must possess guarantees of good repute, reputation and high integrity, and must either know in advance or be informed before assuming their position on the Board of Directors (BoD), about the culture, values and strategy of the Company.

The Members of the Board of Directors (BoD) shall possess the knowledge, skills, experience and independence of judgement deemed necessary based on the duties they undertake, in combination with their role on the Board of Directors (BoD), while they are also called to commit to the exercise of their duties, devoting the time required for the performance thereof.

Upon selection, renewal of term and replacement of a Member, an assessment of individual and collective suitability is carried out, as well as an assessment of the diversity and balanced gender representation criteria. The selection criteria are determined prior to the commencement of the selection procedure and cover all stages thereof, in accordance with Article 3B of Law 4706/2020. At the same time, the Company monitors on an ongoing basis the suitability of the Members of the Board of Directors (BoD), in particular in order to identify, in light of any relevant new event, cases in which reassessment is deemed necessary. Specifically, reassessment of suitability takes place in the following cases:

- where doubts arise as to the individual suitability of the Members of the Board of Directors (BoD) or the suitability of the composition of the body in general,
- in the event of a significant impact on the reputation and integrity of a Member of the Board of Directors (BoD), and
- in any case of an event occurring which may significantly affect the suitability of the Member of the Board of Directors (BoD), including cases in which members do not comply with the Company's Conflict of Interest Policy. It is the responsibility of the Board of Directors (BoD) to ensure the appropriate succession plan for the Company, with the aim of smoothly continuing the management of the Company's affairs and decision-making following departures of Members of the Board of Directors (BoD), in particular executive members and members of committees.

It is a condition for the election or maintenance of the capacity of member of the Board of Directors (BoD) of the Company that no final court decision has been issued within one (1) year, before or after his/her election respectively, recognising his/her liability for damaging transactions of a société anonyme under Law 4548/2018, listed on a regulated market or on a multilateral trading facility, or unlisted, with related parties. The Articles of Association may derogate from the preceding sentence by providing for a longer period than the one set therein. Each candidate member submits to the Company a sworn statement that the impediment of this paragraph does not apply, and each Member of the Board of Directors (BoD) shall promptly notify the Company of the issuance of a relevant final court decision, if any.

Correspondingly, a condition for assigning powers of management and representation of the Company to third persons or for maintaining such assignment in force is that no final court decision has been issued within one (1) year, before or after the assignment of the powers to them, recognising their liability for damaging transactions of a société anonyme under Law 4548/2018, listed on a regulated market or on a multilateral

trading facility, or unlisted, with related parties. The Articles of Association may again derogate from the preceding sentence by providing for a longer period than the one set therein. Each third person who is a candidate for the assignment of the above powers submits to the Company a sworn statement that the impediment of this paragraph does not apply, and each third person to whom assignment has been made shall promptly notify the Company of the issuance of a relevant final court decision.

If it is established that one or more of the suitability criteria of this Policy have ceased to apply with respect to a Member of the Board of Directors (BoD), for reasons which such person could not have prevented even with the utmost diligence, the competent body of the Company shall proceed without delay with the removal and replacement of such person within a period of three (3) months.

5. GOVERNANCE – COMPETENT BODIES

The responsibilities of the Company's bodies relating to the adoption, monitoring, implementation and revision of the Policy are set out below per competent body, with the aim of a clear allocation of responsibilities and the documented monitoring of the Policy.

5.1 General Meeting (GM)

The General Meeting (GM) approves the Policy, as well as any material amendment thereto, in accordance with Article 3 par. 3 of Law 4706/2020. Approval by the General Meeting (GM) ensures that the framework for the selection, replacement, renewal of term and reassessment of the suitability of the Members of the Board of Directors (BoD) is aligned with the applicable legal and regulatory framework and with the principles of this Policy.

5.2 Board of Directors (BoD)

The Board of Directors (BoD) approves the Policy and its amendments, upon recommendation of the Nominations & Remuneration Committee (NRC), and submits the material amendments for approval to the General Meeting (GM). Furthermore, it is responsible for the selection of the candidate Members of the Board of Directors (BoD) and the final approval of the relevant assessments, in accordance with this Policy.

Within the scope of its supervisory responsibility, the Board of Directors (BoD) cooperates with the Committees of the Board of Directors (BoD) and the competent organisational units of the Company for the correct and consistent implementation of the Policy. If, following assessment, it is established that one or more suitability criteria have ceased to apply, the Board of Directors (BoD) determines the further actions to be taken, in alignment with this Policy and Article 3 par. 6 of Law 4706/2020.

5.3 Nominations & Remuneration Committee (NRC)

The Nominations & Remuneration Committee (NRC) supports the Board of Directors (BoD) in the process of identifying, assessing and recommending candidate Members of the Board of Directors (BoD), with the assistance of the Regulatory Compliance Unit (RCU), where deemed necessary. In selecting candidates, it takes into account the factors and criteria of this Policy, as well as the need to comply with the participation percentage of the under-represented gender under Article 3A par. 2 of Law 4706/2020.

Prior to the commencement of the selection procedure, the Nominations & Remuneration Committee (NRC) determines the Company's requirements regarding the size and composition of the Board of Directors (BoD), defines the criteria for the nomination of candidates and describes the responsibilities and required

capabilities of each position on the Board of Directors (BoD), in accordance with Article 3B of Law 4706/2020. If required, it submits proposals for changes or improvements to the composition of the body.

The Nominations & Remuneration Committee (NRC) implements the procedure for nominating candidate Members of the Board of Directors (BoD), assesses their suitability, sometimes with the assistance of an external advisor, and submits the relevant recommendation to the Board of Directors (BoD) and, where required, to the General Meeting (GM) for their election.

Furthermore, the Nominations & Remuneration Committee (NRC) informs the Regulatory Compliance Unit (RCU) whenever a reconfiguration of the Board of Directors (BoD) may take place, either through the appointment of new Members or through restructuring of its existing composition, so as to ensure compliance with the applicable regulatory framework regarding the required disclosures. At the same time, a record of supporting documents and documentation of the assessment process for the Members of the Board of Directors (BoD) is maintained, both upon their appointment and on a periodic basis.

5.4 Regulatory Compliance Unit (RCU)

The Regulatory Compliance Unit (RCU) assists the competent corporate bodies in the consistent application of the Policy and monitors developments in the institutional and regulatory framework connected therewith. In this context, it submits, within its remit, proposals to the Nominations & Remuneration Committee (NRC) and the Board of Directors (BoD), with the aim of updating and aligning the Policy with regulatory developments.

The Regulatory Compliance Unit (RCU) takes care of notifying the Policy to the Members of the Board of Directors (BoD) and of keeping a record of the relevant acknowledgements of receipt. Furthermore, it receives and checks the content of the sworn statements provided for in this Policy, informs the Nominations & Remuneration Committee (NRC) and the Board of Directors (BoD) on matters relating to the implementation of the Policy and, where required by the applicable legal and regulatory framework or by special request of the competent supervisory authority, supports the briefing of the Hellenic Capital Market Commission (HCMC) on matters relating to the Policy.

5.5 Internal Audit Unit (IAU)

The Internal Audit Unit (IAU), as an independent unit of the Internal Control System (ICS), assesses, within the scope of its audit work, the adequacy and effectiveness of the implementation of the Policy. The relevant findings are reflected, as the case may be, in the periodic Internal Audit Reports or in any other appropriate report to the competent corporate bodies.

6. SUITABILITY ASSESSMENT CRITERIA

6.1 Individual Suitability

The individual suitability of the Members of the Board of Directors (BoD) is assessed on the basis of the criteria set out below, which are of a general nature and apply to all Members of the Board of Directors (BoD), regardless of their capacity as executive, non-executive or independent non-executive Members.

Specific impediments, obligations and conditions (such as those under Article 3 par. 4, 5 and 6 and Article 9 par. 1 and 2 of Law 4706/2020 and Article 44 par. 1 of Law 4449/2017) apply independently of the suitability criteria.

6.1.1 Adequacy of Knowledge and Skills

The Members of the Board of Directors (BoD) possess the necessary knowledge, skills and experience for the effective performance of the duties they undertake, taking into account the role, position and prerequisite capabilities thereof.

Experience must cover both the academic and the practical and professional background of each member. Therefore, for the purposes of assessing the theoretical knowledge of a member, indicatively and not exhaustively, the level and type of education, academic knowledge and training, which may relate to the Company's activities or be similar thereto, may be taken into account.

In assessing the adequacy of knowledge and skills as well as practical and professional experience, the overall long-term professional development of each Member of the Board of Directors (BoD) is taken into account, as well as elements such as the duration of tenure in each position, the size of each entity in which he/she previously worked, the scale and complexity of the business activity, the responsibilities held, the number of subordinates, the nature of the business activities, etc.

In the context of assessing adequate knowledge and skills, the following may be examined:

- the role and duties of the position, the required capabilities in combination with the accompanying responsibility of the position and the duration of tenure in it,
- the knowledge and skills acquired through education and training, as well as the size, scale and complexity of the business activity and its nature,
- the practical and professional experience previously acquired, and
- the knowledge and skills acquired and demonstrated through the professional conduct and progression of the Member of the Board of Directors (BoD) in similar management or executive positions in other entities, as well as in other positions held through which he/she had assumed specific responsibilities.

The executive Members of the Board of Directors (BoD) may have acquired sufficient practical and professional experience, either by having assumed a position of responsibility or through the exercise of business activity, for a sufficient period of time.

Participation in the Board of Directors (BoD) of members with experience in areas characterised as of high criticality and for which a trend of necessity of participation on Boards of Directors is internationally developing is encouraged.

The Members of the Board of Directors (BoD) are recommended to know and clearly understand the corporate governance arrangements of the Company, as derived from the relevant legislation, the Corporate Governance Code applied by the Company and the Operating Regulation of the Company, their respective role and responsibilities, both as Members of the Board of Directors (BoD) and as members of its committees, as well as its structure and potential conflicts of interest.

6.1.2 Good Repute and Integrity

The Members of the Board of Directors (BoD) should be distinguished by their good reputation and integrity, which is determined mainly by honesty, integrity and overall personal conduct, while they are presumed to possess good reputation, honesty and integrity in the absence of objective and proven incidents indicating otherwise.

For the assessment of the reputation, honesty and integrity of a candidate or existing Member of the Board of Directors (BoD), the Nominations & Remuneration Committee (NRC) may conduct an investigation and, subject to data protection legislation, request data and supporting documents on any final administrative and court decisions against him/her, in particular for infringements and offences related to his/her capacity as a Member of the Board of Directors (BoD) or to non-compliance with provisions of the legislation of the Hellenic Capital Market Commission (HCMC) or, in general, with financial crimes.

Without prejudice to the provisions of Article 3 par. 4 and 5 of Law 4706/2020, the following may, in particular, be taken into account for such assessment:

- (a) the relevance of the offence or measure to the member's role, the seriousness of the offence or measure,
- (b) the general circumstances, including mitigating factors,
- (c) the role of the person involved,
- (d) the penalty imposed,
- (e) the stage reached in the legal proceedings and any remedial measures put in place,
- (f) the time which may have elapsed and the conduct of the person after the infringement or offence, and
- (g) any decision to exclude the candidate Member of the Board of Directors (BoD) from acting as a Member of the Board of Directors (BoD), issued by any competent authority.

6.1.3 Conflict of Interest

The Company adopts and implements a Conflict of Interest Policy, in compliance with par. 3 (g) of Article 14 of Law 4706/2020, which regulates procedures for the prevention of conflicts of interest also for the Members of the Board of Directors (BoD) of the Company.

6.1.4 Independence of Judgement

Each Member of the Board of Directors (BoD) (executive, non-executive and independent non-executive) shall act with independent judgement during discussions and decision-making within the Board of Directors (BoD). The absence of a conflict of interest does not necessarily mean that the member acts with independent judgement.

The "independence of mind" or "independence of judgement" is a standard of behaviour during discussions and decision-making within the Board of Directors (BoD) and is required of every member, regardless of whether the member is "independent" in accordance with Article 9 of Law 4706/2020. All Members of the Board of Directors (BoD) shall actively participate in meetings and take their own sound, objective and independent decisions and judgements in the performance of their duties, with discernment, self-confidence and incisiveness, without qualitative compromises and with impartiality.

In assessing independence of judgement, the Company takes into account whether all Members of the Board of Directors (BoD) possess the necessary behavioural skills, which include, inter alia:

- courage, conviction and strength to substantively assess and challenge the proposals or opinions of other Members of the Board of Directors (BoD),

- the ability to ask reasonable questions of the other Members of the Board of Directors (BoD) and in particular of the executive members, and to exercise constructive criticism, and
- the ability to resist groupthink.

6.1.5 Sufficient Time Commitment

All Members of the Board of Directors (BoD) shall, for the performance of their duties, devote sufficient time based on the description of the position, the role, the capacity and the duties they have undertaken. For the determination of the adequacy of time, the capacity and responsibilities assigned to the Member of the Board of Directors (BoD), the number of his/her positions as a member of committees of the Board of Directors (BoD) of the Company or of boards of directors and committees of other companies, the resulting capacities held by such Member simultaneously, as well as other professional or personal commitments and conditions, are taken into account.

The Company informs every candidate Member of the Board of Directors (BoD) of the expected time required to be devoted to his/her duties and to meetings of the Board of Directors (BoD) and any other committees in which he/she participates as a member.

The capacity of independent non-executive Member is assessed in accordance with the independence criteria of Article 9 of Law 4706/2020, as in force, as well as with any specific provision of the Operating Regulation of the Company or the applicable Corporate Governance Code. The fulfilment of the independence criteria is examined upon selection or re-election of the Member and is monitored throughout his/her term of office.

6.2 Collective Suitability

The Board of Directors (BoD) should also be collectively suitable for the exercise of its responsibilities and its composition should contribute to the effective management of the Company and balanced decision-making.

The Members of the Board of Directors (BoD) collectively must be sufficiently qualified and capable of taking appropriate decisions taking into account the business model, risk appetite, strategy and markets in which the Company operates. They are also collectively required to be in a position to substantively monitor and challenge the decisions of senior executive management, to also correctly assess corporate performance and to support the Board of Directors (BoD), directing and guiding it where and whenever required.

Every area required for the Company's business activities is recommended to be covered by the Board of Directors (BoD) collectively with sufficient expertise among its members. It is encouraged to have a sufficient number of members with knowledge in each area, so that discussion on the decisions to be taken can be carried out. The Members of the Board of Directors (BoD) collectively must possess the necessary skills to present their views.

The composition of the Board of Directors (BoD) reflects the necessary skills and experience required for the exercise of its responsibilities in managing and monitoring the Company, in particular as regards:

- its business activity and the key risks associated therewith,
- strategic planning,
- financial reporting,
- compliance with the legislative and regulatory framework,

- understanding of corporate governance matters,
- the ability to identify and manage risks,
- the impact of technology on its activity,
- adequate gender representation.

The Board of Directors (BoD) has the primary responsibility for identifying gaps as regards the Company's collective suitability. Therefore, the Board of Directors (BoD) carries out a self-assessment (annually). Assessment of the Board of Directors (BoD) by third-party advisors is also desirable.

7. DIVERSITY CRITERIA

The Company recognises the benefits of diversity among the Members of the Board of Directors (BoD) and of the formation of a diverse group, considering this as the means for achieving the highest team effectiveness and performance. By ensuring cooperation, within the Board of Directors (BoD), of members with qualifications and skills of a broad range, it becomes possible to gather and consider opinions and experiences reflecting the social and business environment in which the Company operates, inspiring confidence in stakeholders for the taking of sound decisions. The achievement of substantive and not merely formal diversity within the Board of Directors (BoD) is an important safeguard for its overall effectiveness.

With regard to the search for suitable candidates, the assessment is evaluative and based on objective indicators, as defined in Law 4706/2020, in this Policy and in the corporate culture, after also taking into account the advantages secured by diversification in the composition of the Board of Directors (BoD).

For this purpose, in the appointment of new Members of the Board of Directors (BoD), the obligation of adequate gender representation is taken into account, namely participation of the under-represented gender of at least twenty-five per cent (25%) of the total Members of the Board of Directors (BoD), in accordance with Article 3A par. 2 of Law 4706/2020. In the event of a fraction, the percentage is rounded to the nearest whole number. The nomination and election of the Members of the Board of Directors (BoD) takes place on the basis of the qualifications, professional experience, capabilities and merit of each candidate, both individually and at the level of the Board of Directors (BoD) as a whole. At the same time, the Company does not allow any exclusion of a candidate on the grounds of discrimination based on gender, race, colour, national, ethnic or social origin, religious or political beliefs, property, birth, disability, age or sexual orientation.

The Nominations & Remuneration Committee (NRC) takes into account the above criterion when submitting proposals for the appointment of Members of the Board of Directors (BoD). The Company ensures, more broadly, equal treatment and equal opportunities between genders. This aspect extends, beyond the selection of Members of the Board of Directors (BoD), also to the provision of training to the Members thereof.

The selection criteria for the Members of the Board of Directors (BoD) are determined prior to the commencement of the selection procedure and cover all stages thereof, in accordance with Article 3B of Law 4706/2020. The selection procedure is adequately documented, so that it is evident that the assessment is carried out on the basis of objective, predetermined and comparable criteria.

Furthermore, a candidate who was examined in the procedure for the selection of candidates for appointment or election to a position of Member of the Board of Directors (BoD) shall receive, within twenty (20) days and following a request addressed to the Company, detailed information regarding the assessment criteria on which the specific selection is based, the objective comparative assessment of the candidates resulting from the application of those criteria, and the specific reasons that led to the exceptional selection of the candidacy of the non-under-represented gender, where such a case applies.

The Company bears the burden of proving that the provisions of Article 3B par. 1 and 2 of Law 4706/2020 have been complied with, in particular as regards the pre-determination of the selection criteria, the objective comparative assessment and the provision of the above information within the prescribed time limit.

Given the Company's subjection to Article 3A par. 2 of Law 4706/2020, the specific requirements of Article 3A par. 3 and 4, as well as of Article 3C of Law 4706/2020, do not apply to the Company, unless the factual circumstances of its subjection change in the future.

8. IMPLEMENTATION AND MONITORING OF THE POLICY

This Policy constitutes the Company's guiding policy for the assessment of the suitability of the Members of the Board of Directors (BoD) and is aligned with the general corporate governance framework, the corporate culture and the risk appetite set by the Company.

The monitoring of the implementation of the Suitability Policy is the responsibility of the Board of Directors (BoD) of the Company, with the assistance of the competent organisational units, including, as appropriate, the Regulatory Compliance Unit (RCU), the Internal Audit Unit (IAU), the legal department and the human resources department. To this end:

Responsible for the regular monitoring, the assessment (carried out at least on an annual basis) and the updating of the Policy is the Regulatory Compliance Unit (RCU) of the Company, which monitors any changes in the relevant legal and regulatory framework and, where required, submits to the Board of Directors (BoD), through the Nominations & Remuneration Committee (NRC), a proposal for the revision of the Policy. The Board of Directors (BoD) examines the proposed amendments before they are finalised.

In addition, the Internal Audit Unit (IAU), within the scope of its independent audit mission, may monitor, audit and assess the observance of this procedure, recording the relevant findings in the periodic Internal Audit Reports or in any other appropriate report to the competent corporate bodies.

Finally, the documentation of the approval of the Suitability Policy and any amendments thereto is kept on file by the Regulatory Compliance Unit (RCU). The Company records the results of the suitability assessment, any weaknesses identified between the prescribed and actual individual and collective suitability, as well as the measures to be taken to address such deficiencies.

9. APPROVAL AND REVISION OF THE POLICY

The Policy is approved by the Board of Directors (BoD) upon recommendation of the Nominations & Remuneration Committee (NRC) and is submitted for approval to the General Meeting (GM), in accordance with Article 3 par. 3 of Law 4706/2020. Any amendments to the Policy are approved by the Board of Directors (BoD) and, if they are material, are submitted for approval to the General Meeting (GM). Material

amendments shall mean amendments which introduce derogations or substantially alter the content of the Policy, in particular as regards the general principles applied and the suitability criteria. The Board of Directors (BoD) is competent to decide whether the amendments are material, upon recommendation of the Nominations & Remuneration Committee (NRC).

The Policy in force from time to time is posted, updated, on the official website of the Company.