

Athens, October 15th, 2021

EXTRAORDINARY GENERAL MEETING OF THE SHAREHOLDERS OF THE COMPANY UNDER THE TRADENAME "ELVALHALCOR HELLENIC COPPER AND ALUMINIUM INDUSTRY S.A." of November 5th 2021

Shareholders' Rights (article 121, par. 4 of law 4548/2018)

In view of the Extraordinary General Meeting of the Shareholders of November 5th, 2021, detailed information on the shareholders' rights, according to the provisions of article 141 of law 4548/2018, is listed below.

(a) At the request of shareholders representing one twentieth (1/20) of the paid-up share capital, the Board of Directors shall include additional items in the agenda of the General Meeting, which has already been convened, provided that the relevant request is received by the Board of Directors until October 21st, 2021, i.e. at least fifteen (15) days prior to the General Meeting. The additional items of the agenda must be published or notified, under the responsibility of the Board of Directors, in accordance with article 122 of L. 4548/2018, at least seven (7) days before the General Meeting, i.e. until 29.10.2021 inclusive. The request to include additional items in the agenda is accompanied by a justification or a draft decision for approval by the General Meeting and the revised agenda is published in the same manner as the previous agenda, on October 23rd, 2021, i.e. thirteen (13) days prior to the date of the General Meeting, and at the same time it is made available to the shareholders on the Company's website along with the justification or the draft resolution that has been submitted by the shareholders, according to the provisions of article 123 paragraph 4 of L. 4548/2018, as in force. If these items of the agenda are not published, the requesting shareholders are entitled to request the postponement of the general meeting in accordance with paragraph 5 of article 141 of L. 4548/2018 and to proceed to the publication themselves, as stipulated by the second subparagraph of this paragraph, at the Company's cost.

(b) Shareholders representing the one twentieth (1/20) of the paid-up share capital are entitled to submit draft resolutions on any items included in the original or any revised agenda of the General Meeting. The relevant request must be received by the Board of Directors until October 29th, 2021, i.e. at least seven (7) days prior to the date of the General Meeting, the draft decisions being made available to the shareholders, according to the provisions of paragraph 3, article 123 of L. 4548/2018, until October 30th, 2021, at the latest, i.e. at least six (6) days prior to the date of the General Meeting.

(c) At the request of any shareholder submitted to the Company until October 30th, 2021, i.e. at least five (5) full days before the General Meeting, the Board of Directors shall provide the General Meeting with any particular information requested in relation to the Company's affairs, in so far as such information is relevant to the items on the agenda. The Board of Directors may refuse to provide the requested information for probable material cause, which shall be stated in the minutes. The Board of Directors may respond in a unified way to shareholders' applications with the same content. No obligation to provide information exists when the relevant is already available on the Company's website, especially in the form of questions and answers.

(d) At the request of shareholders representing one twentieth (1/20) of the paid-up share capital submitted to the Company within the deadline set forth in above paragraph (c), the Board of Directors shall disclose to the General Meeting, if it is an Ordinary General Meeting, the amounts paid over the last two years to each member of the Board of Directors or the managers of the Company, as well as any other provision made to these persons for any reason or cause or contract between them and the Company. The Board of Directors may respond in a unified way to shareholders' applications with the same content. The Board of Directors may refuse to provide the requested information for probable material cause, which shall be stated in the minutes. Such a reason may be, depending on the circumstances, the representation of the requesting shareholders at the Board of Directors in accordance with articles 79 or 80 of L. 4548/2018.

(e) At the request of shareholders representing the one tenth (1/10) of the paid-up share capital which is submitted to the Company until October 30th, 2021, i.e. at least five (5) full days before the General Meeting, the Board of Directors shall provide the General Meeting with information on the course of corporate affairs and the Company's financial standing. The Board of Directors may refuse to provide such information for probable material cause, which shall be stated in the minutes. Such a reason may be, depending on the circumstances, the representation of the requesting shareholders at the Board of Directors in accordance with articles 79 or 80 of L. 4548/2018, provided that the respective members of the Board of Directors have received the relevant information in an adequate manner.

In all the aforesaid cases the shareholders making requests are required to prove their shareholder status as well as, except in case (c) above, the number of shares they hold as at the time of exercising the relevant right. The status of Shareholder is verified by any means provided by law and in any case by means of notification obtained by the Company from the Central Securities Depository, if it provides registration services, or through participating and registered intermediaries in the Central Securities Depository in any other case. For further details on minority rights, Shareholders should refer to the provisions of article 141 of L. 4548/2018.