

**DRAFT REVISED SUITABILITY POLICY FOR THE ORDINARY SHAREHOLDERS' MEETING
OF ELVALHALCOR S.A. OF 11 MAY 2026**



**SUITABILITY POLICY
OF THE MEMBERS OF THE BOARD OF DIRECTORS OF
“ELVALHALCOR HELLENIC COPPER AND ALUMINIUM INDUSTRY S.A.”**

1. PREAMBLE

This Board of Directors Members Suitability Policy (hereinafter the “**Policy**”) constitutes an essential part of the Corporate Governance System of ELVALHALCOR HELLENIC COPPER AND ALUMINIUM INDUSTRY S.A. (hereinafter the “**Company**”). The purpose of the Policy is to ensure the quality staffing, effective operation and fulfilment of the role of the Company’s Board of Directors (hereinafter the “**Board of Directors**”), based on the Company’s overall strategy and medium- to long-term business objectives, with a view to promoting the corporate interest. Through its implementation, the acquisition and retention of persons possessing abilities, knowledge, skills, experience, independence of judgment, guarantees of integrity and good reputation are ensured, so as to secure sound and effective management for the benefit of the Company, its shareholders and all stakeholders. In this way, the prudent management of the Company is strengthened and the risk management system to which it is exposed is enhanced.

The Policy, as well as any material amendment thereto, is proposed to the Board of Directors by the Company’s Remuneration and Nomination Committee, in cooperation with the Internal Audit Unit and the Company’s Legal Department, is subsequently approved by the Board of Directors and submitted for approval to the General Meeting of the Company’s shareholders. Recommendations of any other external bodies may also be taken into account for material amendments to the Policy. Material amendments shall mean amendments introducing deviations or materially changing the content of the Policy, particularly as regards the general principles and criteria applied.

For the preparation of the Policy, which is posted and updated on the Company’s website (www.elvalhalcor.com), account was taken of the provisions of Articles 3, 3A and 3B of L. 4706/2020 on “Corporate Governance of Sociétés Anonymes, Modern Capital Market, Incorporation into Greek Legislation of Directive (EU) 2017/828 of the European Parliament and of the Council, Measures for the Implementation of Regulation (EU) 2017/1131 and other provisions”, as amended by L. 5178/2025 and in force. The Policy is also aligned with Circular No. 60/29.04.2025 (updating Circular No. 60/18.09.2020) of the Hellenic Capital Market Commission, which further specifies the principles and guidance of the above regulatory framework.

In shaping the Policy, the Company takes into account its size, internal organisation, risk appetite, the nature, scale and complexity of its activities, as well as international best practices.

The Policy takes into account the specific description of the responsibilities of each member of the Board of Directors and his/her participation or not in Committees, the nature of his/her duties (executive or non-executive member of the Board of Directors), his/her classification as an independent or non-independent member of the Board of Directors, as well as any specific incompatibilities, characteristics or contractual commitments associated with the nature of the Company's activities and the Corporate Governance Code applied by the Company.

The Company's Policy is clear, sufficiently reasoned and documented and is governed by the principles of transparency and proportionality.

The Policy is consistent with the provisions of the Company's Rules of Procedure and the Corporate Governance Code applied by the Company.

2. POLICY OBJECTIVE

The principal objectives of the Policy are the following:

- i. to analyse the criteria for assessing the suitability (individual and collective) and reliability of the members of the Board of Directors and to determine the minimum required supporting information and documentation;
- ii. to establish transparent rules and procedures for the assessment of the suitability and reliability of the members of the Board of Directors upon their selection, replacement or reappointment;
- iii. to determine the circumstances in which it is deemed appropriate to reassess the suitability and reliability of the members of the Board of Directors and the procedures applicable thereto;
- iv. to allocate responsibilities among the Company's bodies for the implementation of the Policy; and
- v. to ensure the quality staffing, effective operation and fulfilment of the role of the Board of Directors based on the Company's overall strategy and medium- to long-term business objectives, with a view to promoting the corporate interest.

3. APPROVAL AND REVISION OF THE POLICY

The Company monitors the effectiveness of the Policy and carries out a periodic assessment thereof at regular intervals or whenever significant events or changes occur. The Company also amends the Policy and reviews its design and implementation, where appropriate, taking into account the recommendations of the Remuneration and Nomination Committee and the Internal Audit Unit, as well as any other external bodies.

The Policy is approved and reviewed by the Board of Directors, following a recommendation by the Remuneration and Nomination Committee in cooperation with the Internal Audit Unit and the Company's Legal Department, and is submitted for approval to the General Meeting.

4. PRINCIPLES RELATING TO THE SELECTION, REPLACEMENT OR RENEWAL OF THE TERM OF OFFICE OF THE MEMBERS OF THE BOARD OF DIRECTORS

The Board of Directors has a sufficient number of members and an appropriate composition.

The Company seeks to staff the Board of Directors with persons of integrity and reputation.

The members of the Board of Directors possess the skills and experience required on the basis of the duties they undertake and their role on the Board of Directors, while at the same time they devote sufficient time to the performance of their duties.

Upon the selection, renewal of term of office and replacement of a member, both individual and collective suitability are taken into account.

Prospective members of the Board of Directors are, to the extent possible, familiar with the Company's culture, values and overall strategy before assuming office.

The Company continuously monitors the suitability of the members of the Board of Directors, in particular in order to identify, in light of any relevant new event, cases in which a reassessment of their suitability is necessary. In particular, a reassessment of suitability is carried out in the following cases:

- a) where doubts arise as to the individual suitability of members of the Board of Directors or the suitability of the composition of the body;
- b) where there is a significant impact on the reputation of a member of the Board of Directors;
- c) whenever an event occurs which may significantly affect the suitability of a member of the Board of Directors, including cases where members do not comply with the Company's Conflict of Interest Policy.

By way of indication, the suitability of the members of the Company's Board of Directors is reassessed in the cases referred to below under section "7. CANDIDATE ASSESSMENT PROCEDURE", paragraph "c. Cases of reassessment of the suitability and reliability of persons falling within the scope of the Policy".

The Board of Directors ensures that the Company has an appropriate succession plan for the smooth continuity of the management of the Company's affairs and the decision-making process following the departure of members of the Board of Directors, in particular executive members and committee members.

The selection criteria are determined prior to the commencement of the selection process and apply throughout all stages thereof, so that, where the Company falls within paragraph 3 of Article 3A of L. 4706/2020 (as added by Article 5 of L. 5178/2025), namely employs 250 employees or more and has an annual turnover of at least EUR 50,000,000 or an annual balance sheet total of at least EUR 43,000,000, and does not meet the required percentage for the balanced representation of genders on the Board of Directors referred to below under "6. CRITERIA FOR ASSESSING COLLECTIVE SUITABILITY AND REQUIRED DOCUMENTATION", paragraph "b. Adequate gender representation", priority shall be given, among candidates with equal qualifications in terms of adequacy, capabilities and professional performance, to the candidacy of a person of the underrepresented gender, unless exceptional reasons, specifically justified, require the selection of the candidate of the other gender.

A candidate considered during the selection process for appointment or election to the position of member of the Board of Directors shall, within twenty (20) days following a request submitted to the Company, receive detailed information regarding:

- a) the assessment criteria on which the specific selection was based;

- b) the objective comparative assessment of the candidates resulting from the application of the criteria under paragraph (a); and
- c) the specific reasons leading to the exceptional selection of the candidate of the non-underrepresented gender, where applicable.

5. INDIVIDUAL SUITABILITY ASSESSMENT CRITERIA AND REQUIRED DOCUMENTATION

The individual suitability of the members of the Board of Directors is assessed primarily pursuant to the criteria set out below. These criteria are general and apply to all members of the Board of Directors, regardless their capacity as executive, non-executive, or independent non-executive.

Specific impediments, obligations and conditions (such as of art. 3 par. 4,5 and 6 and of art. 9 par. 1 and 2 of l. 4706/2020 and art. 44 par. 1 of l. 4449/2017) apply regardless the suitability criteria and are reviewed in the cases provided for by the law (such as art. 9 par. 3 of l. 4706/2020).

More specifically, the individual suitability assessment criteria of the members of the Board of Directors are the following:

a. Adequacy of knowledge and skills

The members of the Board of Directors have the required know-how, skills and experience for performing their duties in view of the role, the position and the prerequisites set out by the Company for the position at issue. Experience encompasses both practical and professional experience as well as any required theoretical knowledge.

In particular, they should have:

- a) adequate knowledge in exact, economic, legal or other humanities, documented at least by a domestic or foreign, equivalent to the domestic, Higher Education Institution degree or be graduates of a domestic or foreign Technical School.
- b) professional competence for any specialized subjects,
- c) adequate knowledge in the Company's activity field and, more specifically, experience in the metal products industry branch or in the sub-branch of Raw Materials in which the Company has joined the Athens Stock Exchange.

The existence of the above conditions is verified through:

- detailed curriculum vitae, providing information on their training and professional experience, and
- duly certified degree copies – professional licenses and certificates.

Within the context of assessment, any additional information considered necessary may be taken into account.

In order to assess the practical experience, an exhaustive analysis of the experience and training is conducted, covering the member's past service and kind of employment, taking into account the length of its engagement in the respective entity, the size of the entity concerned, the scale and complexity of the business activity, the competences entrusted to it in the entity in question, the number of his subordinates, the nature of the entity's activities as well as its responsibility degree.

More specifically, in the context of assessing adequate knowledge and skills and reliability in general, the following are considered:

- a) the role and duties of the position and the required skills,
- b) the knowledge and skills acquired through education and training,
- c) the previously acquired practical and professional experience,
- d) the knowledge and skills acquired and demonstrated by the professional conduct and development of a member of the Board of Directors.

The executive members of the Board of Directors may have acquired satisfactory practical and professional experience either by holding a responsible position or by conducting a business activity for a long time period.

The Company ensures that the members of the Board of Directors are adequately aware and understand the Company's corporate governance regulations, as such arise from the Law and the Corporate Governance Code adopted by the Company, their respective role and responsibilities both as Board of Directors' members and as members of its Committees, as well as the group's structure and any possible conflict of interests.

b. Guarantees of ethics and reputation

The members of the Board of Directors are distinguished for their good reputation and ethics, which is mainly demonstrated by their honesty and integrity. They are distinguished by impeccable ethics.

It may be presumed that a member of the Board of Directors has good reputation, honesty and integrity, unless there are objective and proven reasons to suggest otherwise.

In order to assess the reputation, integrity and honesty of a candidate or a current member of the Board of Directors, the Company conducts an investigation and, subject to the law on the personal data protection, request information and relevant supporting documents such as documents of the competent judicial or administrative authority of the State of descent or origin on any final administrative and court decisions against him, in particular for infringements and offenses related to his capacity as a member of the Board of Directors or to his non-compliance with the provisions of the Hellenic Capital Market Committee law or in general to economic crimes. Subject to the provisions of article 3 par. 4 and 5 of L. 4706/2020, in this assessment are taken into account in particular the relevance of the offense or of the degree with the member's role, the seriousness of the offense or of the degree, the in general conditions, including the mitigation factors, the role of the person involved, the sentence imposed, the stage reached in the legal proceedings and any remedial measures implemented. The time elapsed and the behavior of the person after the infringement / offense are also taken into account.

The Company also takes into account, in the course of the assessment, any decision issued by any authority disqualifying the candidate member of the Board of Directors from acting as a member of a board of directors, and in particular whether the candidate member of the Board of Directors has the status of a "disqualified director", in accordance with Chapter A, Articles 1–10, of L. 5122/2024 ("Transposition of Article 1 of Directive (EU) 2019/1151 in so far as it concerns disqualified directors and other urgent provisions") and Articles 56A–56Z of L. 4919/2022 (as in force following its amendment by L. 5122/2024). The existence of such circumstance constitutes an absolute impediment to appointment, and the relevant

candidate shall be excluded and shall neither be appointed/elected nor proposed for appointment/election as a member of the Board of Directors.

The information submitted to the Company by the eligible members of the Board of Directors may be subject to verification as to their accuracy and, if necessary, an investigation is conducted, taking into consideration the stipulations of the law on the personal data protection.

Indicatively, an eligible person may be excluded from becoming a member of the Board of Directors in the following cases:

- a) any criminal proceedings are pending against it
- b) is itself, or any associated to it person, directly or indirectly related to competitive companies or maintains relations with the Company, direct or indirect, the nature of which does not allow the taking over in the specific capacity,
- c) the existence of any indication that it was uncooperative and non-transparent in its communication with the Supervisory and other authorities.

In all cases, a prerequisite for election or retention of the capacity of member of the Company's Board of Directors is the submission by each candidate, prior to his/her nomination, of a solemn declaration that none of the above impediments exists. Each member of the Board of Directors notifies promptly the Company of the issuance of any final court order against it, in any capacity.

c. Conflict of interests

The Company has, adopts and implements a Conflict of Interests Policy pursuant to par. 3 (g) of art. 14, L. 4706/2020. This Policy includes conflict of interest prevention procedures, measures for the disclosure and management of conflicts of interest as well as any cases and conditions that would exceptionally be acceptable for a member of the Board of Directors to have conflicting interests if such are significantly limited or subject to proper management.

All real and potential conflicts of interest at the level of the Board of Directors are subject to adequate notification, discussion, documentation, decision-making and proper management (i.e. adoption of necessary measures to reduce conflicts of interest) even if these cannot be avoided for the detection, management and monitoring and, where appropriate, disclosure of such conflicts of interest in order to prevent their detrimental effect on the interests of the Company and its shareholder investors.

In this regard, the Company keeps a record of conflicts of interest, in which are recorded the cases of conflict of interest, the operations / corrective actions undertaken to address and manage these cases as well as the statements and reports submitted.

More specifically, the members of the Board of Directors owe a duty of loyalty towards the Company and should avoid any conflict of interest with the Company as well as with those of the Company's group, in compliance with the stipulations of the relevant conflict of interest policies of the Company. Within this context, each member should make a statement as to the fact that there is no financial connection with the Company that entails a conflict of interest or jeopardizes the independence of the former before its appointment in accordance with the Company's candidacy policy.

Furthermore, the Members of the Board of Directors should:

1. Not to take advantage for personal gain any real or potential opportunities presented as a result of the use of Company's assets, following information obtained due to their participation in the Board of Directors or, in general, as result of their capacity as members of the Board of Directors, without the consent of the Board of Directors. The member of the Board of Directors should promote the Company's interests whenever given the opportunity.
2. Not to become members of a company or professional trader between which and the Company a conflict had recently arose or is imminent in the form of litigation, labor mobilization, obstruction of the public to carry out transactions (boycott) or other similar action, which may have a material impact on the results or the reputation of the Company and / or of the Company and the Group.
3. It is strictly forbidden to the members of the Board of Directors to use any information that comes to their knowledge in the exercise of their duties for the purpose of conducting transactions themselves or any third parties on the Company's shares. Therefore, the Members of the Board of Directors and their affiliated persons deal on the Company's or other companies of the group securities pursuant to the conditions stipulated by the law and the relevant Company's policies. The member of the Board of Directors should notify the Internal Audit Unit via the Secretary of the Board of Directors, on annual basis, of their key professional positions and activities, including any duties undertaken in non-profit organizations, as well as the legal entities names in which they or their affiliated persons hold shares or are stakeholders by a share entitling them to control more than 10% of the voting rights. In addition, the members of the Board of Directors should timely notify the Internal Audit Unit via the Secretary of the Board of Directors, of any change regarding the above, as well as any other event which might generate any conflict of their interests with such of the Company or the group or any change in their capacity as non-executive members of the Board of Directors.
4. Any financial relation or/and transaction between the Company and a member of the Board of Directors or any affiliated person of the latter (i.e. business partnership) should be integrated to the Company's regulatory operations framework and be governed mutatis mutandis by the same terms as those governing the current transactions of the Company with its other clientele at the given time period, always in combination with the Company's risk management rules.
5. The members of the Board of Directors should notify timely the Internal Audit Unit via the Secretary of the Board of Directors, and prior to its conclusion, of any significant transaction between them and/or the parties related thereto on one part and the Company on the other part. The term "significant transaction" means one or more transactions conducted in a year, of which the value exceeds the amount of 150.000€ or an individual transaction, the value of which exceeds the amount of 10.000€.
6. According to the national and European regulatory framework as to the utilization of confidential information, the executive members of the Board of Directors should notify the Hellenic Capital Market Committee and the Company promptly and within a time period less than 3 days from the date of the transaction, of any Company's equity securities transaction, which they conduct on their own behalf, upon condition that the annual aggregate value of the said transactions exceed the amount of 5.000€.

7. The members of the Board of Directors are not to participate in deliberations and decisions on any issue in which there is an actual or potential conflict of their interests with such of the Company and the Group. In case of doubt, they are consulting the Chairman of the Board of Directors.

8. The Chairman of the Board of Directors may request from one or more members of the Board of Directors to abstain from the deliberations or the adoption of decision on any specific issue, if in his opinion there is a conflict of interest.

In any case, a prerequisite for the election or maintenance of the Board of Directors membership, is the prior filing of a solemn statement by which it pledges loyalty, avoidance competition and any action undermining the prevention of conflict of interest between itself and the Company or the group, unless otherwise permitted, in accordance with the Law or the Articles of Association of the Company.

Moreover, the following professional capacities are incompatible with the capacity of a member of the Board of Directors:

1. The capacity of executive, member of the Board of Directors, employee or person in any other capacity which implies an obligation of loyalty to a company that is among the Company's competitors or other organizations whose interests may systematically conflict with the interests of the Company and its shareholders.

2. An employee or associate of an audit firm who, whether through an undertaking or personally, or whose relative up to the second degree by blood or marriage, or spouse, has carried out a statutory audit of the Company or of a company affiliated with it during the last three (3) financial years prior to his/her appointment.

3. The member must not have or have held in the last four (4) years prior to his / her appointment prominent public duties in Greece, such as those of Head of State or Government (President of the Republic or Prime Minister), member of the Government, member of the Parliament, judicial or military official, senior official of a legal entity subject to public law or an independent authority and senior official of a political party.

In all cases, the prerequisite for the election of a member of the Board of Directors is the signature of a solemn statement from the part of the candidate for the non-concurrence in its person of the aforementioned incompatible capacities.

d. Independence of judgment

Each member of the Board of Directors acts on independent judgment. Independence of mind or independence of judgment is a standard of behaviour during discussions and decision-making within the Board of Directors and is required for every member, irrespective of whether the member is "independent" within the meaning of Article 9 of L. 4706/2020. All members of the Board of Directors participate actively in the meetings and make their own right, objective and independent decisions in the performance of their respective duties.

As objectivity is meant the impartial attitude and ethos, which allows to a member of the Board of Directors to carry out its task, as they believe appropriate and not to accept compromises as to their quality. As independence is meant the exemption from conditions that prevent the member of the Board of Directors from performing his duties in an impartial manner.

The Company makes sure that all members of the Board of Directors have the necessary behavior skills, which amongst others include the following:

1. Courage, conviction and vigor to carry out a substantial assessment and dispute of the suggestions or views of the other members of the Board of Directors,
2. The ability to make reasonable questions to the other members of the Board of Directors and, in particular, to the executive members of the Board of Directors,
3. The ability to resist to group-thinking phenomenon.

Finally, it is pointed out that for a member of the Board of Directors to be recommended in the General Meeting as suitable to become an independent non-executive member, it should meet the conditions and criteria set out in article 9 of L. 4706/2020, fact which is confirmed by the signature from his part of a solemn statement of similar content prior to its election or subsequently during its term of office, in compliance with the decisions of the competent corporate bodies.

e. Allocation of sufficient time

All members of the Board of Directors spend in the performance of their tasks the time required pursuant to the description of the position, the role and their duties. In order to determine the adequate time, the capacity and competences assigned to the member of the Board of Directors is question are taken into account, as well as the number of its positions as member to other boards of directors and the simultaneous capacities vested in it, in addition to other or personal commitments and conditions.

Moreover, the Company informs each eligible member of the Board of Directors on the anticipated time required to spend to its duties and to the meetings of the Board of Directors and any other committees in which it participates as a member.

Finally, in all cases, the prerequisite for a candidate's election as a member of the Board of Directors, is the signature of a solemn statement by which it acknowledges that it was notified of the minimum time required for its participation in the meetings of the Board of Directors or in Company's committees and the performance of the relevant duties. In addition, the eligible member should, by his relevant statement, notify the Company prior to its election, the number of its positions as a member of the Board of Directors in other companies, the thereby simultaneous capacities vested in it as well as other professional or personal commitments and conditions.

6. COLLECTIVE SUITABILITY ASSESSMENT CRITERIA AND REQUIRED DOCUMENTATION

a. General

The Board of Directors is properly composed for the performance of its competences and the effective administration of the Company as well as the balance decision-making.

The members of the Board of Directors are elected by the General Meeting for a time period of one (1) year and are unlimitedly re-eligible. According to the Greek Law, the Board of Directors membership may be revoked by decision of the General Meeting of Shareholders.

Collectively, the members of the Board of Directors may adopt appropriate decisions, taking into account the business model, the risk appetite, the strategy and the markets in which the

Company is engaged. Moreover, the members of the Board of Directors collectively monitor and judge the decisions of the senior management.

All fields of knowledge required for the business activity of the Company are covered by the Board of Directors collectively, as its members have both adequate experience and knowledge. More specifically, it is ensured that there are sufficient members conversant with the business field of the Company, in order to be able to deliberate of the resolutions to be adopted. The members of the Board of Directors collectively are properly skilled to present their views.

The from time to time composition of the Board of Directors reflects the knowledge, skills and experience required for the exercise of its competences. The Board of Directors as a whole understands well the fields for which members are collectively responsible and has the required skills to exercise the actual management and supervision of the Company, amongst others, in respect of:

- i. the Company's business activity and the principal risks associated therewith;
- ii. strategic planning;
- iii. financial reporting;
- iv. compliance with the legal and regulatory framework;
- v. corporate governance matters;
- vi. sustainability matters;
- vii. the identification and management of risks;
- viii. the impact of technology on the Company's activities; and
- ix. adequate gender representation.

In order to identify gaps with regard to collective suitability, provision is made for the possibility of an annual self-assessment of the Board of Directors, in particular where its term of office lasts or is extended for more than one (1) year, as well as for an assessment of the Board of Directors by reputable third-party advisers.

b. In particular, the adequate representation per gender

The Company ensures adequate gender representation, which, subject to the following sentence, amounts to at least twenty-five per cent (25%) of the total number of members of the Board of Directors, rounded, where a fraction arises, to the nearest whole number. Subject to Article 17 paragraph 3 of L. 5178/2025, where the Company falls within paragraph 3 of Article 3A of L. 4706/2020 (as added by Article 5 of L. 5178/2025), namely where it employs two hundred and fifty (250) employees or more and has an annual turnover of at least fifty million euros (EUR 50,000,000) or an annual balance sheet total of at least forty-three million euros (EUR 43,000,000), the above percentage shall amount to at least thirty-three per cent (33%) of the total number of members of the Board of Directors, rounded, where a fraction arises, to the nearest whole number and, in addition, if the Board of Directors includes three (3) or more executive members, the above percentage of thirty-three per cent (33%) shall include at least one (1) executive member of the underrepresented gender.

The Remuneration and Nomination Committee takes the above criterion into account when submitting proposals for the appointment of members of the Board of Directors.

The Company ensures equal treatment and equal opportunities between genders.

The Policy is followed not only in the selection of members of the Board of Directors, but also in the training and development of members of the Board of Directors.

c. Diversity criteria

The Company has adopted and implements a diversity policy with a view to promoting an appropriate level of diversity on the Board of Directors and a broad-based group of members. By bringing together a wide range of qualifications and skills in the selection of members of the Board of Directors, diversity of views and experience is ensured for the purpose of sound decision-making. The Policy is incorporated in and/or referred to in the diversity policy, in order to ensure that it has been taken into account in the appointment of new members of the Board of Directors. Adequate gender representation on the Board of Directors is expressly provided for, in accordance with the provisions set out above under “b. In particular, the adequate representation per gender”, and no exclusion whatsoever shall apply on the grounds of gender, race, colour, ethnic or social origin, religion or beliefs, property, birth, disability, age or sexual orientation.

d. Training

More specifically, the training of the new members of the Board of Directors provides for their participation in an introductory program, offered by the Company, which includes presentations, risk management, business plan financial administration issues, major financial and accounting issues, of the regulatory compliance and corporate governance, of the Ethics Code, of the administrative structure, of the executives and of the Company’s internal and external auditors. Moreover, the Company offers to all members of the Board of Directors, regardless sex, continuous training and development programs aiming to the improvement of the Board of Directors’ supervisory capacity.

7. CANDIDATES ASSESSMENT PROCEDURE

a. General

The suitability and reliability assessment of the eligible persons falling within the Policy takes place before the appointment of the member of the Board of Directors, upon recommendation of the Remuneration and Nomination Committee. If a member of the Company’s Board of Directors becomes an interim member of the Board of Directors due to resignation, death or dismissal of another member, at the recommendation of the Remuneration and Nomination Committee, his aforementioned status will be confirmed by the next General Meeting of the shareholders.

b. Stages of the assessment procedure

The stages of this procedure are specified in greater detail in the Rules of Operation of the Remuneration and Nomination Committee and, in summary, are as follows:

For each candidate, the necessary supporting documents are collected and an “Assessment Report” is prepared by the Remuneration and Nomination Committee, accompanied by its recommendation as to whether such person adequately meets the established suitability and reliability criteria. The recommendation of the Remuneration and Nomination

Committee, fully and adequately reasoned, for the selection of the most suitable candidate(s), based on the Assessment Report(s) and accompanied by the relevant supporting documents, is submitted to the Company's Board of Directors in order for the final selection of the most suitable candidate(s) to be made.

c. Cases of reassessment of the suitability and reliability of persons falling within the scope of the Policy

Where, during the term of office of the Board of Directors, changes occur affecting the suitability or reliability requirements of the members of the Board of Directors, the retention of the capacity of member of the Board of Directors shall be reassessed.

Indicatively, the following cases are listed:

- initiation or bringing of criminal proceedings against a member of the Board of Directors;
- issuance of a final administrative or judicial decision against a member of the Board of Directors, in particular for infringements and offences connected with his/her capacity as a member of the Board of Directors or with non-compliance with the provisions of the legislation of the Hellenic Capital Market Commission or, more generally, with financial crimes;
- a change in the circumstances of the member of the Board of Directors or persons connected thereto, which may create a conflict of interest with the interests of the Company;
- withdrawal or revocation of a professional licence; and
- receipt of any objective and verified information regarding the reliability of the persons concerned.

The decision as to whether or not the suitability and reliability of a person should be reassessed shall be taken by the Remuneration and Nomination Committee in cooperation with the Internal Audit Unit and the Legal Department.

8. SUITABILITY POLICY IMPLEMENTATION, MONITORING AND AMENDMENT

The Policy is aligned with the broader corporate governance framework, the corporate culture and the risk appetite that have been established.

The Board of Directors closely monitors the implementation of the Suitability Policy. For this purpose, it is assisted by the Internal Audit Unit, the Remuneration and Nomination Committee and the Secretary of the Board of Directors. The Annual Corporate Governance Statement shall include a relevant reference.

The documentation relating to the approval of the Policy and any amendments thereto shall be kept on file, including in electronic form. The Company records the results of the assessment of suitability and, in particular, any deficiencies identified between the expected and the actual individual and collective suitability of the members of the Board of Directors, as well as the measures to be taken in order to address such deficiencies.

This Policy was approved by the Board of Directors at its meeting held on 20 April 2026, following the recommendation dated 6 April 2026 of the Company's Remuneration and Nomination Committee, and by the Annual General Meeting of the Company's shareholders held on 11 May 2026.