General Meeting and Shareholder Communication Procedure

Approved by decision of the Board of Directors Minutes 147 / 06.03.2026

Contents

VERSION CONTROL

Version Number	Version Date / Last Modified	Points that changed
01	March 2026	Prepared in accordance with the applicable Articles of Association, the Charter of Operations, the Shareholder Services & Corporate Announcements Policy, and the procedures included in the Invitations to the General Meetings of Shareholders.
02		

1. INTRODUCTION

The company under the corporate name "ADMIE HOLDING S.A." (hereinafter the "Company") has established and implements a **Procedure for Convening General Meetings and Communicating with Shareholders**, in accordance with the provisions of Law 4548/2018, Law 4706/2020, the Hellenic Corporate Governance Code, the Company's Articles of Association, the Charter of Operations, the Shareholder Services & Corporate Announcements Policy, and the procedures set out in the Invitations to the General Meetings of Shareholders.

This Procedure establishes the framework governing the convening of General Meetings and communication with shareholders, defines the allocation of responsibilities and sets out the procedures applicable to the conduct of General Meetings.

2. PURPOSE

This Procedure is established with the aim of ensuring that the Company supports and facilitates both the participation of shareholders in General Meetings and the effective exercise of their rights to the greatest possible extent.

3. SCOPE

The Procedure applies to the shareholders and the Board of Directors of the Company, as well as to any other department of the Company that is involved in supporting the execution of the stages described in detail in the following sections.

4. PRINCIPLES

The General Meeting of Shareholders[1] is the Company's supreme governing body and is entitled to decide on any corporate matter, in accordance with Law 4548/2018. Its decisions are binding on all shareholders, including those who are absent or dissenting.

5. ROLES AND RESPONSIBILITIES

5.1. BOARD OF DIRECTORS

The Board of Directors of the Company ensures that adequate and effective procedures are implemented for the convening of the General Meetings of Shareholders (ordinary or extraordinary).

[1] Article 116 of Law 4706/2020

In order to ensure the maximum participation of shareholders in the General Meeting, on the basis of full and timely information, the Board of Directors ensures that appropriate mechanisms[2] are in place for the timely publication of the invitation to the General Meeting.

5.2. CEO

The Chief Executive Officer (CEO) is responsible for ensuring the proper implementation of this Procedure and for executing corrective actions to resolve issues that may conflict with the Company's compliance with the applicable legal and regulatory framework.

5.3. Shareholder Services and Corporate Announcements Unit

The Shareholder Services and Corporate Announcements Unit is the unit responsible for the implementation of this Procedure. In particular, the Unit is responsible for ensuring the prompt, accurate and equal dissemination of information to shareholders, as well as for supporting them in the exercise of their rights, in accordance with the applicable legislation and the Company’s Articles of Association. In particular, the Unit[3] is responsible for the following:

a) The distribution of dividends and bonus shares, the issuance of new shares through cash contributions, share exchanges, the determination of the period for exercising the relevant pre-emption rights, as well as any changes to the initial time limits, such as the extension of the period for exercising such rights.

b) The provision of information regarding ordinary or extraordinary General Meetings and the decisions adopted therein.

c) The acquisition of treasury shares, their disposal or cancellation, and the implementation of share distribution or free share allocation programs to members of the Board of Directors and the Company’s personnel.

d) Communication and data exchange with central securities depositories and intermediaries, in the context of shareholder identification.

e) maintaning communication with shareholders.

f) Informing shareholders, in accordance with the provisions of Article 17 of Law 3556/2007 (Government Gazette, Series I, No. 91), regarding the provision of facilities and information by the Company.

g) Monitoring shareholders’ exercise of their rights, particularly with regard to shareholding participation percentages and the exercise of voting rights at General Meetings.

[2] Hellenic Corporate Governance Code, paragraph 7.5.

[3] Article 19 of Law 4706/2020

5.4. Legal Department and Corporate Secretary

The Legal Department, in cooperation with the Corporate Secretary of the Company, is responsible for ensuring compliance with this Procedure, as well as for collecting the necessary information and coordinating all involved parties for the timely and complete preparation of the Invitation to the General Meeting. The Invitation to the General Meeting shall include, at a minimum, information regarding the date, venue, the proposed agenda, and a precise description of the procedures for shareholder participation and voting.

6. DETAILED PROCEDURE FOR CONVENTING GENERAL MEETINGS AND COMMUNICATING WITH SHAREHOLDERS

6.1. Types of General Meetings

6.1.1. The General Meeting of Shareholders shall be convened at least once during each financial year, no later than the tenth (10th) calendar day of the ninth month following the end of the financial year, in order to decide on the approval of the annual financial statements and the appointment of auditors (Ordinary General Meeting – hereinafter referred to as the "OGM"[4]). The Ordinary General Meeting may also decide on any other matter within its competence.

6.1.2. Subject to the provisions of paragraph 2 of Article 121 of Law 4548/2018, the General Meeting may also be convened extraordinarily whenever the Board of Directors considers it appropriate or necessary (Extraordinary General Meeting).

6.1.3. The General Meeting convened to amend the Articles of Association or to adopt decisions requiring an increased quorum and majority (Statutory General Meeting) may be either ordinary or extraordinary.

6.2. Preparation of the Invitation to the General Meeting

6.2.1. The General Meeting of Shareholders is convened by the Board of Directors of the Company, which determines the items of the Agenda, unless otherwise provided for in. Article 121 of Law 4548/2018.

6.2.2. The General Meeting of Shareholders shall be held at the registered office of the Company, or within the boundaries of another Municipality within the region of the registered office or an

[4] Article 119 of Law 4706/2020

adjacent Municipality, or within the jurisdiction of the Municipality where the Athens Stock Exchange is located, or with the participation of shareholders remotely through electronic means as provided for in Article 125 of Law 4548/2018, in accordance with the provisions of the Company's Articles of Association.

6.2.3. The invitation to the General Meeting shall include at least the information provided for in Law 4548/2018 and shall be lawfully published at least twenty (20) full days prior to the date of the meeting, by being filed with the General Commercial Registry (G.E.MI.) and published on the Company's website.

6.2.4. Irrespective of the above methods of publication of the invitation, each shareholder has the right to request that the Company send them individual information by email regarding upcoming General Meetings, at least ten (10) days prior to the date of the meeting.

6.2.5. In the event that the quorum required by law and by the Articles of Association for the adoption of resolutions on the items of the Agenda is not achieved, any Repeat Ordinary General Meeting shall be held on a predetermined date, time and place, as specified in the Invitation to the General Meeting. The items on the Agenda of the Repeat Ordinary General Meeting, if any, shall be the same as those of the initial meeting, since, in accordance with Article 130 paragraph 2 of Law 4548/2018, as in force, no new invitation is published.

6.3. Participation Procedure in Person or by Proxy

6.3.1. The participation of shareholders in the Ordinary General Meeting, as well as in any Repeat Meeting thereof, as mentioned above, shall take place in accordance with the provisions of Law 4548/2018. Access to the meeting venue shall not be permitted to shareholders, journalists, or any other third parties, except for the members of the Board of Directors, the Secretary, the Chair of the Audit Committee, and the Head of the Company's Internal Audit Unit, as well as the persons responsible for the conduct of the General Meeting.

6.3.2. In order for Shareholders to participate in the General Meeting remotely in real time via audiovisual or other electronic means, without physical presence, it is required that the shareholder or their proxy create and use an online account on the online platform developed by the Hellenic Exchanges – Athens Stock Exchange S.A. Group for the provision of services relating to the conduct of General Meetings remotely in real time via teleconference for issuing companies, on the website: https://axia.athexgroup.gr.

6.3.3. Access to the online platform requires a computer or a smartphone or tablet, with an installed web browser and Internet access.

6.3.4. To create a shareholder or proxy account on the above online platform, a valid email address and the mobile phone number of the shareholder or their proxy are required.

6.3.5. In the event that, upon logging into the online platform, the information entered by the shareholder does not match the data registered in the Dematerialized Securities System and notified to the Company by the "Hellenic Central Securities Depository S.A." (hereinafter "HCSD") within the context of the shareholder identity verification services it provides to issuers for remote general meetings, in accordance with Part 3 of Decision No. 8 of the Board of Directors of HCSD titled "Technical terms and procedures for the provision of the Registry, Corporate & Other Related Actions Service," as well as the form "Terms and conditions for the remote General Meeting of Shareholders," the shareholder must update or correct their above information in order to create their account.

6.3.6. For this purpose, shareholders must promptly contact the Participant of their Securities Account maintained in the Dematerialized Securities System, in accordance with the provisions of the Operating Regulation of the Hellenic Central Securities Depository, as in force, or any other intermediary acting as custodian of their shares, in order to notify or update their valid email address and mobile phone number for identification purposes.

6.3.7. Shareholders may contact the Company's Shareholder Services Department for any questions or further information (89 Dyrrachiou & Kifisou St., 104 43 Athens), at telephone number (+30) 210 3636936, Monday through Friday (excluding weekends), from 09:00 to 17:00, as well as in electronic form on the Company's website www.admieholding.gr).

6.3.8. Furthermore, from the publication of this notice and until the conclusion of the General Meeting, information and support will be provided to shareholders and their proxies regarding matters related to the conduct of the General Meeting via the AXIA e-SM (e-Shareholders Meeting) platform (e.g., connection, voting, etc.) at telephone number +30 210 3366426 or via email at AXIAeShareholdersMeeting@athexgroup.gr.

6.3.9. On the date of the General Meeting, to participate in its work, shareholders must log into the Online Platform in a timely manner - between sixty (60) and at least ten (10) minutes prior to the announced starting time of the General Meeting indicated in the Invitation - and declare the number of voting rights with which they will participate and vote in the General Meeting, and modify this number if they so wish (to a lower number).

6.3.10. Shareholders participating in the General Meeting via teleconference in real time shall be counted for quorum and majority purposes and shall be able to effectively exercise their rights during the General Meeting.

6.3.11. Accordingly, shareholders who log into the online platform will be able to attend the General Meeting via live teleconference through a link sent to them via email. By activating the teleconference application (Zoom) through this link, shareholders will be able to:

α) follow the proceedings of the General Meeting,

β) take the floor and address the General Meeting orally during its session,

while at the same time, through the online platform, they will also be able to:

γ) vote during the General Meeting on the items of the agenda,

δ) receive confirmation of the recording of their vote.

6.4. Right of Participation

6.4.1. Persons (natural or legal) who are shareholders of the Company on the fifth day prior to the commencement of the Ordinary General Meeting, hereinafter referred to as the "Record Date"), are entitled to participate remotely and vote at the General Meeting. Specifically, this includes persons registered on the Record Date in the records of the Dematerialized Securities System managed by the Hellenic Central Securities Depository (HCSD), or those identified as shareholders of the Company through participants, registered intermediaries, or other intermediaries in accordance with Laws 4548/2018, 4569/2018, 4706/2020, Regulation (EU) 2018/1212, and the Operating Regulation of the HCSD (Government Gazette B/1398/21.03.2025).

6.4.2. The aforementioned Record Date also applies in the case of a postponed or repeat meeting, provided that the postponed or repeat meeting is held no later than thirty (30) days from the Record Date (Article 124, paragraph 6 of Law 4548/2018).

6.4.3. Proof of shareholder capacity may be established by any lawful means and based on information received by the Company up to and including before the commencement of the General Meeting from the HCSD, provided that it offers registry services, or through the aforementioned participants and registered intermediaries in accordance with the above provisions. A shareholder may participate in the General Meeting on the basis of confirmations or notifications pursuant to Articles 5 and 6 of Regulation (EU) 2018/1212 provided by the intermediary, unless the General Meeting refuses such participation for a significant reason justifying its refusal, in compliance with the applicable provisions (Article 19 paragraph 1 of Law 4569/2018, Article 124 paragraph 5 of Law 4548/2018).

6.4.4. The exercise of the aforementioned rights of participation and voting does not require the blocking of the beneficiary's shares or the observance of any other similar procedure that would restrict the ability to sell or transfer them during the period between the Record Date and the date of the General Meeting.

6.4.5. In the event of non-compliance with the provisions of Article 124 of Law 4548/2018, the said shareholder may participate in the General Meeting only with its permission.

6.5. Minority Shareholder Rights

6.5.1. In accordance with the provisions of Law 4548/2018, the following shall apply:

a) – **Article 141 paragraph 2 of Law 4548/2018** – Upon request of shareholders representing one twentieth (1/20) of the paid-up share capital, the Board of Directors of the Company is required to include additional items on 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. The additional agenda items must be published or disclosed, under the responsibility of the Board of Directors, in accordance with Article 122 of Law 4548/2018, at least seven (7) days prior to the General Meeting. The request to include additional items on the agenda must be accompanied by a justification or a draft resolution for approval at the General Meeting, and the revised agenda must be made public in the same manner as the previous agenda, **i.e., thirteen (13) days prior to the date of the General Meeting.** It must also be made available to shareholders on the Company's website, together with the justification or the draft resolution submitted by the shareholders, in accordance with paragraph 4 of Article 123 of Law 4548/2018. If these items are not published, the requesting shareholders are entitled to request a postponement of the General Meeting in accordance with Article 141, paragraph 5 of Law 4548/2018 and to proceed with publication themselves as specified in the second sentence of this paragraph, at the Company's expense.

(b) – **Article 141, paragraph 3 of Law 4548/2018** – Upon request by shareholders representing one twentieth (1/20) of the paid-up share capital, the Board of Directors shall make available to shareholders, as specified in Article 141 paragraph 3 of Law 4548/2018, no later than **six (6) days prior to the date of the General Meeting**, draft resolutions on items included in the initial or any revised agenda, provided that the relevant request is received by the Board of Directors no later than **at least seven (7) days prior to the date of the General Meeting.**

(c) – **Article 141, paragraph 5 of Law 4548/2018** – Upon request by a shareholder or shareholders representing one twentieth (1/20) of the paid-up share capital, the Chair of the General Meeting is required to postpone, only once, the decision-making process of the General Meeting, whether ordinary or extraordinary, for all or certain items, setting a new date for the continuation of the session, as specified in the shareholders' request, which, however, may not be more than twenty (20) days from the date of the postponement. The Meeting that reconvenes after the postponement is considered a continuation of the previous session and does not require the repetition of the shareholder invitation publication formalities. New shareholders may also participate in the reconvened Meeting, provided that the applicable participation formalities are observed. For companies with shares listed on a regulated market, the provisions of paragraph 6 of Article 124 shall apply.

(d) – **Article 141, paragraph 6 of Law 4548/2018** – Upon request by any shareholder submitted to the Company no later than **five (5) full days prior to the General Meeting,** the Board of Directors is required to provide the requested specific information to the General Meeting regarding the affairs of the Company, to the extent that such information is relevant to the items on the agenda. Furthermore, upon request by shareholders representing one twentieth (1/20) of the paid-up share capital, the Board of Directors is required to announce to the General Meeting, provided it is an ordinary meeting, the amounts paid over the last two years to each member of the Board of Directors or to the Company's executives, as well as any benefit granted to these individuals for any reason or under any contract concluded between them and the Company. In all of the above cases, the Board of Directors may decline to provide the information for a substantial and valid reason, which must be recorded in the minutes. The Board of Directors may respond collectively to shareholder requests that have the same content. There is no obligation to provide information if the relevant information is already available on the Company's website, especially in the form of questions and answers.

(e) – **Article 141, paragraph 7 of Law 4548/2018** – Upon request by shareholders representing one tenth (1/10) of the paid-up share capital, submitted to the Company no later than **five (5) full days prior to the General Meeting,** the Board of Directors is required to provide the General Meeting with information regarding the course of corporate affairs and the financial position of the Company. The Board of Directors may decline to provide the information for a substantial and valid reason, which must be recorded in the minutes.

6.5.2. In the cases referred to in paragraphs 6 and 7 of Article 141 of Law 4548/2018, any dispute as to whether the justification for the Board of Directors' refusal to provide information is valid shall be resolved by the court through a ruling issued under the procedure of interim measures. The same decision shall also require the Company to provide the information that was refused. This decision cannot be appealed.

6.5.3. Corresponding deadlines for the potential exercise of minority shareholder rights also apply in the case of a Repeat General Meeting.

6.5.4. In all of the aforementioned cases, the requesting shareholders must prove their shareholder capacity and, except in the case of the **first sentence of paragraph 6 of Article 141 of Law 4548/2018**, the number of shares they hold at the time of exercising the relevant right. Such proof may be provided by the certification of shareholder capacity through direct electronic connection between the records of the intermediary and the Company.

6.6. Procedure for Exercising Voting Rights via Proxy

6.6.1. A shareholder may participate in the General Meeting and vote either in person or through a proxy. Each shareholder (legal or natural person) may appoint up to three (3) natural persons as proxies to participate in the General Meeting. However, if the shareholder holds shares of the Company that appear in more than one securities accounts, this limitation does not prevent the shareholder from appointing different proxies for the shares recorded in each securities account in relation to the General Meeting. A proxy acting on behalf of multiple shareholders may vote differently for each shareholder.

6.6.2. Specifically, with regard to the participation of a shareholder through a proxy in the General Meeting remotely in real time via teleconference, or to the participation of a shareholder through a proxy in the voting on the items of the General Meeting conducted prior to the General Meeting, the shareholder, or the Participant of the Securities Account in the Dematerialized Securities System (DSS), or another intermediary acting as custodian of the shareholder through whom the shares are held, may appoint up to one (1) proxy, **whose appointment must be made at least forty-eight (48) hours prior to the date of the General Meeting.**

6.6.3. With respect to any Repeat General Meeting, shareholders who did not appoint a proxy for the initial General Meeting, or shareholders who wish to replace the proxy previously appointed, in order to participate remotely in the voting that will take place prior to the General Meeting, may appoint up to one (1) proxy, whose appointment must be made **at least forty-eight (48) hours prior to the date of the General Meeting.**

6.6.4. The appointment and revocation of a proxy for participation in the General Meeting must be made in writing and notified to the Company by submitting the relevant document to the Company's registered office (89 Dyrrachiou & Kifisou, 104 43 Athens), by post, or by email to office@admieholding.gr

6.6.5. The proxy of a shareholder is required to disclose to the Company, prior to the commencement of the General Meeting, any specific fact that may be useful to shareholders in assessing the risk that the proxy might serve interests other than those of the shareholder. For the purposes of this paragraph, a conflict of interest may arise particularly when the proxy:

α) is a shareholder who exercises control over the Company, or is a different legal entity or entity controlled by that shareholder;

β) is a member of the Board of Directors or of the management of the Company, or of a shareholder exercising control over the Company, or of another legal entity or entity controlled by a shareholder exercising control over the Company;

γ) is an employee or statutory auditor of the Company, or of a shareholder exercising control over the Company, or of another legal entity or entity controlled by a shareholder exercising control over the Company;

δ) is the spouse or a first-degree relative of one of the natural persons referred to in cases (a) to (c).

6.6.6. The appointment and revocation of a shareholder's proxy shall be made in writing and notified to the Company in the same manner, at least forty-eight (48) hours prior to the date of the General Meeting.

6.6.7. The Company has made available: a) in printed form at the Company's registered office (89 Dyrrachiou and Kifisou St., 104 43, Athens)) and b) in electronic form on its website (www.admieholding.gr), the form used for the appointment and revocation of a proxy. The above form must be completed and signed by the shareholder and submitted to the Company's registered office at 89 Dyrrhachiou Street and Kifisou Avenue, 104 43, Athens, bearing a certified signature by a competent authority, or sent digitally signed using a recognized digital signature (qualified certificate) via email to office@admieholding.gr or, in the case of shareholders identified through intermediaries, through confirmations or notifications pursuant to Articles 5 and 6 of Regulation (EU) 2018/1212 provided by the intermediaries, at least forty-eight (48) hours prior to the date of the General Meeting.

6.7. Available documents and information

6.7.1. The information referred to in paragraphs 3 and 4 of Article 123 of Law 4548/2018 will be made available in electronic form on the Company's website www.admieholding.gr.

6.7.2. The relevant forms will also be available in hard copy at the Company's registered office at the Shareholder Services Department (89 Dyrrachiou & Kifisou St., 104 43, Athens, telephone (+30) 210 3636936) and in electronic form on the Company's website athttps://admieholding.gr/el/genikes-synelefseis-metochon/

6.8. Announcement of General Meeting Voting Results

6.8.1. The result of the vote is announced by the chair of the General Meeting as soon as it is determined.

6.8.2. The Company shall publish on its website, under the responsibility of the Board of Directors, the voting results no later than five (5) days from the date of the General Meeting. For each resolution, the Company shall specify at least the number of shares for which valid votes were cast, the proportion of the share capital represented by those votes, the total number of valid votes, the number of votes in favor and against each resolution, and the number of abstentions.

6.9. Communication with Shareholders

6.9.1. The Company's Corporate Governance System includes adequate and effective mechanisms for communication with shareholders, facilitating the exercise of their rights and promoting active shareholder[5] engagement.

[5] Law 4706/2020, Article 13, par. 1c

6.9.2. These mechanisms are implemented through the operation of the Company's Shareholder Services and Corporate Announcements Unit, through telephone support or through written requests submitted by shareholders via the webpage: https://admieholding.gr/el/epikoinonia-ependyton/, as well as through Questions & Answers (Q&A) documents that may be prepared and published on the Company's website, ensuring the equal information of all shareholders.

6.9.3. To the extent that shareholders' questions relating to items on the agenda are not answered during the meeting, the Company provides for a procedure for submitting the relevant responses, according to which either a Questions & Answers (Q&A) document is prepared or a Press Release is issued and published on the Company's website for the information of all shareholders. There shall be no obligation to provide information where the relevant information is already available on the Company's website.

6.9.4. More generally, for the purpose of updating shareholders with information and communicating with them on a regular basis, the Company makes use of its website, taking appropriate measures to ensure equal access of shareholders to the disclosure of information, while ensuring that the Company fulfils its information disclosure obligations in accordance with the applicable legislation within a reasonable timeframe.

6.9.5. The Board of Directors, where necessary for the achievement of the Company's objectives and in line with the Company's strategy, ensures timely and open dialogue with all Stakeholders and uses different communication channels for each stakeholder group, guided by flexibility and by the facilitation of understanding of the respective interests (e.g., through roadshows, social media, press releases, and announcements on the Company's website, etc.).

6.10. Minutes of General Meeting Sessions and Resolutions

6.10.1. The discussions and resolutions adopted during the General Meeting shall be recorded in summary form in a special minutes book. A list of the shareholders who attended or were represented at the General Meeting shall also be recorded in the same book. Upon request of a shareholder, the Chair of the General Meeting is required to record in the minutes a summary of the shareholder's opinion. The Chair of the General Meeting may refuse to record such opinion if it clearly relates to matters outside the agenda or if its content is manifestly contrary to public morals or the law.

6.10.2. Copies of the minutes of the General Meeting sessions shall be submitted to the competent service of the General Commercial Registry (G.E.MI.), in accordance with paragraph 3 of Article 93.

7. NOTIFICATION OF PROCEDURE

7.1.1. Each Procedure shall be published on the Company's website.

8. REVIEW AND ENTRY INTO FORCE

8.1.1. The Procedure for Convening General Meetings and Communicating with Shareholders of the Company is prepared and reviewed by the Head of the Shareholder Services and Corporate Announcements Unit, in cooperation with the Compliance Unit, and, following the consent of the Chief Executive Officer, is submitted to the Company's Board of Directors for approval.

8.1.2. This Procedure was approved by decision of the Company's Board of Directors.

APPENDIX 1 NOTICE REGARDING THE PROCESSING OF PERSONAL DATA OF THE COMPANY'S SHAREHOLDERS AND OTHER PARTICIPANTS IN THE GENERAL MEETING

The company under the name **"ADMIE HOLDING S.A."**, with registered office in Athens (89 Dyrrachiou & Kifisou Street), with Tax ID No. 800799573 (Tax Office: FAE Athens) and General Commercial Registry (G.E.MI.) number 141287501000 (hereinafter the "Company"), in its capacity as data controller, in accordance with and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter the "General Data Protection Regulation" or "GDPR"), Law 4624/2019 and all applicable data protection legislation, hereby provides the required information regarding the processing of personal data of natural persons who are or have been registered shareholders of the Company, those who currently hold shareholder status in the Company, the legal representatives and proxies of the shareholders, as well as any pledgees of the shareholders, anyone entitled to exercise voting rights and, in general, anyone who derives or exercises rights over the Company's shares, their representatives, those exercising voting rights on behalf of legal entities, as well as all persons who participate in the Company's General Meetings in any capacity (including, indicatively, Members of the Board of Directors of the Company, executives, auditors, and other third parties), either in person or remotely (hereinafter, for the purposes of this notice, all the above categories of natural persons will collectively be referred to as the "Shareholders" and each individually as a "Shareholder").

It is noted that processing of personal data means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The Company, in its capacity as the issuer of shares, lawfully processes the personal data of the Shareholders, i.e., the aforementioned natural persons in the capacities described above, solely for legitimate and lawful purposes. It does so by adhering to the principles of fair and transparent processing, implementing appropriate technical and organizational measures, and complying with the requirements of the GDPR and all applicable legal frameworks. The Company's primary concern is always the safeguarding and protection of personal data and the fundamental rights of data subjects.

In line with the above and in compliance with the principle of transparency, the Company hereby provides this notice to inform Shareholders about the terms under which their personal data is processed.

(i) What personal data does the Company process and from where is it collected

The personal data of Shareholders that the Company collects and generally processes in the context of the operation and facilitation of the shareholder capacity, and for carrying out tasks governed by said shareholder relationship, are those that are strictly necessary, appropriate and relevant, and are limited to what is required for the purposes for which they are processed. Indicatively, the main categories of personal data concerning Shareholders and which the Company processes to fulfil lawful processing purposes include:

(a) Identification data and identification documents, such as full name, father's name, spouse's name, date of birth, number and copy of identity card or passport or other equivalent document, tax identification number (TIN), competent Tax Office, country of tax residence, any special tax treatment, profession/occupation, nationality, and other demographic data.

(b) Contact data, such as mailing address, email address, landline and mobile phone number.

(c) Bank account number.

(d) Number and class of shares.

(e) Investor Share Code Number in the Dematerialized Securities System (DSS), Securities Account in the Dematerialized Securities System (DSS), Shareholder Registry Number.

(f) Correspondence data with Shareholders.

(g) Data regarding the capacity under which the Shareholder participates in the General Meeting of the Company and the relevant supporting documents, shareholding information and the rights attached thereto, and information regarding share trading activity.

(h) Data concerning the participation and exercise of voting rights by the Shareholder at the General Meeting of the Company, details of various requests submitted to the Company from time to time, Shareholder signatures, and in general any other information required in the context of applying the applicable financial markets legislation.

(i) Image and audio (video) data from the participation of the individual in the General Meeting held remotely.

(j) Data related to the exercise of voting rights and the content of the vote, if requested pursuant to Article 131 paragraph 2 of Law 4548/2018 in the context of a remote General Meeting.

(k) Shareholders' access credentials to the online platform https://axia.athexgroup.gr, through which they will be able to participate and vote remotely at the General Meeting.

The aforementioned personal data are collected either directly from the Shareholders themselves, for the handling of matters concerning them - who must also ensure that their information is kept up to date so that the Shareholders' Register is always accurate and current - or from third parties authorized by the Shareholders, or from the société anonyme under the name "Hellenic Central Securities Depository S.A.", which, as operator of the Dematerialized Securities System (DSS), maintains shareholder identification data and other information regarding the Company's shareholder base and share transactions, and makes them available to the Company through electronic files, in accordance with the provisions of the applicable legislation and the Regulations of the Dematerialized Securities System (DSS).

(ii) What are the personal data processing purposes?

The Company collects the personal data of Shareholders as stated above and processes them for the fulfilment of lawful processing purposes, always based on valid legal grounds that establish the lawfulness of such processing.

Specifically, the Company processes the personal data of Shareholders for the following purposes:
(a) to identify the Shareholder,
(b) to communicate with the Shareholder,
(c) to verify the ability and lawfulness of exercising the Shareholders' rights according to the law, as well as to facilitate Shareholders in exercising their legal rights (indicatively, the exercise of participation and voting rights, and generally the exercise of Shareholder rights in General Meetings, confirmation of shareholder status, maintenance of the Shareholders' register, keeping minutes of the General Meeting, participation in corporate actions, and dividend distribution),
(d) to carry out and implement corporate actions (e.g., dividend distribution, share capital increases), to disclose transactions by obligated persons to the Athens Stock Exchange, and to monitor transactions involving Company shares.
(e) to fulfil the Company's contractual obligations to Shareholders (such as dividend payments) and, more broadly, to satisfy all obligations of the Company towards its Shareholders.
(f) to ensure the Company's compliance with its legal obligations.
(g) to fulfil and safeguard the legal claims and to defend and serve the Company's legitimate interests (in the context of the Company's legal claims), unless such interests are overridden by the interest or the fundamental rights and freedoms of the data subjects requiring data protection.
(h) to comply with obligations arising from tax legislation and other mandatory legal provisions.
(i) to keep and manage the Shareholders' Register, in accordance with the provisions of applicable legislation.
(j) to carry out over-the-counter share transfers,
(k) to publish acts and information of the Company in the General Commercial Registry (G.E.MI.), the Athens Stock Exchange, or on the Company's website, when such publication is required by law.
(l) the Company's response to shareholders' requests, the processing of shareholders' requests within the scope of services provided by the Company (e.g. issuance of certificates), and the provision of answers and clarifications to specific questions or requests submitted to the Company by shareholders.
(m) to maintain a historical archive of the Company's shareholders.

(iii) Who are the recipients of personal data?

Access to the shareholders' personal data is granted solely to authorized employees of the Company, as well as to third parties (Data Processors) who provide shareholder registry services and related secretarial or legal support to the Company. These parties process personal data on behalf of the Company in accordance with the authorization granted to them by the Company and are bound by obligations of confidentiality regarding their actions. Furthermore, the aforementioned third parties provide sufficient guarantees regarding the implementation of appropriate technical and organizational measures so that processing complies with the requirements of the GDPR and ensures the protection of the data subjects' rights (Article 28 GDPR).

Specifically for the personal data of the Company's shareholders and other participants in the Company's remote General Meetings, a recipient is also the société anonyme under the name "Hellenic Central Securities Depository S.A.", which has been assigned by the Company, as a data processor on behalf of the Company, the organization of the remote General Meeting. Other sub-processors may also be involved, such as Zoom Video Communication Inc., which provides the Zoom tools/services enabling videoconferencing through its cloud computing services, which are hosted within the European Economic Area (EEA).

The Company does not transfer, disclose, or disseminate the shareholders' personal data, except in the following cases:

(a) To third-party service providers who, on behalf of the Company, perform various services, either acting as independent data controllers or jointly with the Company, such as banks, financial service providers, external consultants, associates, lawyers, accountants, auditors, as well as providers of technical and support services. In such cases, the data processing is carried out under the supervision of the Company, solely on its mandate, and is subject to the same privacy protection policy or a policy providing at least the same level of protection.

(b) To the société anonyme under the name "Hellenic Central Securities Depository S.A."

(c) To supervisory, audit, tax, independent, judicial, police, public and/or other authorities and bodies, in accordance with their statutory responsibilities, duties, and powers (indicatively, the Bank of Greece, the European Central Bank, the Hellenic Capital Market Commission, the Athens Stock Exchange, the Central Securities Depository, the Anti-Money Laundering Authority, the Deposits and Loans Fund, and the General Commercial Registry).

(d) Other Shareholders of the Company, as the case may be, in accordance with the provisions of the law.

(e) Other companies belonging to the Company's Group.

The Company has lawfully ensured that those processing personal data on its behalf, as outlined above, meet all legal requirements and provide adequate assurances regarding the implementation of appropriate technical and organizational measures, in a manner to ensure that such processing complies with the requirements of the GDPR and the applicable legislative and regulatory framework, and that the rights of the data subjects are effectively protected.

In the event that the transfer of personal data to third countries is required (i.e., to countries outside the European Economic Area (EEA)) or to international organizations, such transfer and any related processing shall always be carried out in compliance with the GDPR and, more generally, with the legislative framework governing the protection of personal data. Such transfers shall only occur where the conditions and provisions of the GDPR, aimed at ensuring that the level of protection of natural persons guaranteed by the GDPR is not undermined, are met and where adequate safeguards for the protection of personal data are in place.

(iv) Retention period of personal data

The duration for which the Company retains shareholders' personal data, in the context of their shareholder capacity, is defined for the entire lifetime of the Company and in accordance with the applicable regulatory framework in force at any given time.

Personal data is retained by the Company for the time period prescribed by law and, more generally, for as long as is required under the applicable legislative and/or regulatory framework or required for the purpose of serving and safeguarding the Company's legitimate interests, for the exercise or defence of legal claims in the event of litigation, for the pursuit of the Company's claims, and for the fulfilment of its contractual obligations, and always in accordance with the applicable legal basis and the specific purpose for which the data is processed.

(v) Measures for the protection and security of personal data

The Company has incorporated into its systems, policies and internal procedures all technical and organizational measures aimed at ensuring the lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality of processing. It is fully compliant with all principles governing the processing of shareholders' personal data, as provided for in the GDPR and the applicable legal framework in force at any given time. At the same time, the Company implements appropriate technical and organizational security measures within its systems and procedures, with the aim of safeguarding the confidentiality, integrity, and availability of personal data. These measures are also designed to protect data against unauthorized or unlawful processing, accidental loss, destruction or damage, alteration, unauthorized disclosure or access, and, in general, any other form of improper processing

Furthermore, it is noted that, in the context of holding the Company's General Meetings remotely, the required videoconferencing is conducted using platforms that support security features. It is ensured that the link to the scheduled videoconference is adequately protected, and a thorough review of the terms of use and privacy policies is carried out when selecting a videoconferencing solution, in full compliance with the GDPR, Law 4624/2019, and the applicable legislation on the protection of personal data.

(vi) Rights of data subjects

The Shareholder, as a data subject, retains the following rights under the GDPR, which may be exercised as applicable:

(a) Right of access to personal data concerning them, specifically, the right to know which personal data the Company holds and processes in relation to them, their origin, the purposes of such processing, the categories of data, and the recipients or categories of recipients (Article 15 GDPR).

(b) Right to rectification of inaccurate data as well as the right to complete incomplete data, so that they are accurate and up to date, by providing all necessary documentation evidencing the need for rectification or completion (Article 16 GDPR).

(c) Right to erasure ("right to be forgotten") of personal data, including, among other grounds, when there is no longer a valid reason for processing, subject to the Company's obligations and legal rights to retain such data in accordance with applicable legislative and regulatory provisions (Article 17 GDPR).

(d) Right to restriction of processing, either because the accuracy of the data is contested, or because the processing is unlawful, or because the purpose of the processing has ceased, provided that there is no legal basis for retaining the data (Article 18 GDPR).

(e) Right to data portability, whereby the Shareholder has the right to receive the personal data concerning them, which they have provided to the Company, in a structured, commonly used and machine-readable format, or to request that such data be transmitted or transferred to another data controller, provided that the processing is based on consent and carried out by automated means, and subject to the Company's legal rights and obligations to retain such data (Article 20 GDPR).

(f) Right to object to the processing of personal data concerning them, on grounds relating to the particular situation of the Shareholder, in cases where processing is carried out for the purposes of legitimate interests pursued by the Company or a third party, or for the performance of a task carried out in the public interest or in the exercise of official authority (Article 21 GDPR). The Shareholder, as a data subject, also has the right to object to a decision of the Company that is made solely on the basis of automated processing, including profiling, if such decision produces legal effects concerning them or significantly affects them in a similar way, unless specific grounds apply in accordance with applicable legislation.

(g) In cases where processing is based on the Shareholder's prior explicit consent, the Shareholder retains the right to withdraw such consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

(or) Right to file a complaint with the competent authority, by which the Shareholder has the right to submit a complaint to the Personal Data Protection Authority (www.dpa.gr), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons, against the processing of data concerning them, if they consider that their rights are violated in any way and that the processing of their data is carried out in violation of the applicable legislation, as well as the right to legal recourse.

It is further noted that the Company reserves the right, in any case, to refuse to satisfy a Shareholder's request, if, for example, the processing is necessary for the maintenance of shareholder capacity and/or the holding of voting rights, for the exercise of their rights as a Shareholder of the Company and/or as a holder of voting rights, as well as for the establishment, exercise, or defence of the Company's legal rights, the Company's compliance with its legal obligations, or the fulfilment of its obligations toward the Shareholders.

The Company shall, in any case, have the right to refuse the deletion of a Shareholder's personal data if such data is necessary for the purpose of maintaining the Company's historical Shareholder records, or if the processing or retention of such data is necessary for the establishment, exercise, or defence of its legal claims, or for the fulfilment of its obligations.

The exercise of the right to data portability does not entail the deletion of the data from the Company's records.

(vii) Method of Exercising Data Subject Rights

Any request by Shareholders concerning their personal data processed by the Company, as well as any request for the exercise of their rights, must be submitted in writing to the Company and sent either via email to: office@admieholding.gr or delivered in person to the Company's registered office.

Refusal or undue delay by the Company in satisfying Shareholders' requests regarding the exercise of their rights entitles them to lodge a complaint with the Hellenic Data Protection Authority, as the competent supervisory authority for the application of the GDPR, as outlined above.

The Company, in accordance with its applicable data protection policy and within the context of the prevailing legal and regulatory framework, may revise or amend the present notice. The most up-to-date version will always be available on the Company's website at: https://admieholding.gr/en/general-meetings/.