DIVERSITY POLICY

This document is part of the corporate governance system applied by the Company and reflects the policy adopted by the Company in order to fulfil its obligations under the EU and Greek legislation.

The Company adopts and implements this Diversity Policy, which is fully aligned with its business strategy, mission, vision and values.

The Company pledges that it will remain committed to its philosophy of not tolerating any kind of discrimination or offensive behavior against one's personality or social exclusion or unfair treatment based on nationality, race, color, ethnic or social origin, ethnic minority, property, birth, disability, age, sexual orientation, gender, genetic characteristics, marital status, religious or political beliefs.

The Company promotes diversity on its Board as it believes that by bringing together a wide range of qualifications and skills when selecting Board members, it ensures a diversity of views and experience that can contribute to sound decision-making and through diversity it is possible to achieve maximum team effectiveness and performance, enhance innovation and enable Board members to work together among themselves and with executives. Therefore, the Company believes that diversity on the Board is a necessary element to maintain and enhance its competitiveness, and in this context the Company promotes an appropriate level of diversity on the Board and a diverse group of members. Specifically with respect to adequate gender representation, the Company seeks to ensure that gender representation is at least twenty-five percent (25%) of the total Board membership. To this end, the Remuneration and Nomination Committee shall take this criterion into account when making proposals for the nomination of Board members. In general, the Company seeks to ensure equal treatment and equal opportunities between genders, and this aspect extends beyond the selection of Board members to the provision of training to Board members.

The Diversity Policy, in addition to Board members, is applied and taken into account during the selection and placement of senior executives and applies to all staff.

All appointments of managers should be made primarily on the basis of merit, skills, ethics and experience regardless of gender, color, race, nationality, disability, age, religion, sexual orientation, political opinion or any other discriminatory criterion.

The Company recognizes that in an era where flexibility and creativity are keys to competitiveness, promoting diversity in its administrative, management and supervisory bodies is important to its further business development. At the same time, the Company recognizes that diversity in the broader workplace can multiply the opportunities to access a greater variety of solutions to issues related to its business, thereby increasing its competitive advantage.

The search and selection process for senior management positions should be carried out on the basis of meritocratic and objective criteria, taking into account the benefits of applying the principle of diversity. A prerequisite for the appointment of a senior manager is first and foremost the possession of the necessary qualifications and other parameters as defined by the Company. However, the process should ensure that all genders have equal opportunities to be selected as candidates. In accordance with the current policy, diversity in the workplace does not allow for the exclusion of any executive from any function or position.

The policy is reviewed by the Board at least every two years or whenever deemed necessary especially in case of amendments to the relevant legal and regulatory framework.