EYDAP

SHAREHOLDER COMMUNICATION POLICY AND PROCEDURES

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TABLE OF ISSUES

DECISION OF THE BoD	ISSUE NUMBER	RESPONSIBLE ORGANIZATIONAL UNIT
22145/22.07.2026	1	Regulatory Compliance Division

Table of Contents

1. Purpose

The Corporate Governance System, in accordance with the provisions of Law 4706/2020, includes, among other things, adequate and effective communication mechanisms with shareholders, in order to facilitate the exercise of their rights and promote active dialogue with them.

The Board of Directors, as provided for in the Corporate Governance Code adopted by the Company, ensures the existence of mechanisms for identifying and understanding the interests of stakeholders and monitors their effectiveness.

In this context, and in order to ensure the active participation of shareholders (shareholder engagement), it is necessary to establish constructive dialogue between shareholders and the Company. In accordance with the applicable legislative and regulatory framework, as well as with the principles of best practices in corporate governance, EYDAP S.A. (hereinafter referred to as the "Company") sets out in this Policy the communication mechanisms it has adopted in order to fulfil its information obligations, ensure equal treatment of its shareholders, and further enhance transparency, two-way communication, and their ability to participate meaningfully in the shaping and understanding of corporate developments.

2. General Principles

The Company is committed to providing all shareholders, on an equal basis, with:

➢ the necessary information enabling them to have full knowledge and an adequate understanding of corporate matters and to exercise their respective rights;

➢ the appropriate tools and means of communication and constructive dialogue with the Company's Management;

➢ updated information in the event that new matters arise in relation to information previously provided to them.

The following principles constitute the core values that shape the Company's relationships with its shareholders and the wider public:

- transparency
- respect for the principle of equal treatment in the disclosure of information
- equal treatment with regard to the recognition and exercise of the rights of all shareholders, irrespective of their percentage of ownership

- protection of the rights and legitimate interests of all shareholders
- implementation of a comprehensive communication strategy for financial, non-financial, and corporate information through appropriate information and communication channels
- compliance with the provisions of the law, particularly within the framework of corporate governance, as well as with the principles of transparency and cooperation with all competent Authorities, including Supervisory and Regulatory Authorities.

3. Shareholder Communication Procedures and Mechanisms

The Company has established the following communication mechanisms with its shareholders:

A. Corporate Website / Communication Channels with Shareholders and Investors

An important means of communication and information for shareholders and investors is the Company's website (www.eydap.gr), and in particular the "INVESTOR RELATIONS" section, where reliable, timely and up-to-date information is available on the following matters:

- Share Information (key share data, dividend, share performance)
- Financial Results
- Financial Calendar
- Corporate Announcements
- Shareholders' Meetings
- Shareholder Services (cash distributions, transfer of shares due to inheritance succession)
- Corporate Governance Matters
- Presentations, Information Bulletins and Corporate Publications

In addition, dedicated communication channels have been established to facilitate two-way communication with shareholders/investors, through which those wishing to obtain further information may contact either the Shareholder Services & Corporate Announcements Department or the Financial Analysis & Investor Relations Division, depending on their capacity. All available contact details are recorded and kept up to date on the Company's website (https://www.eydap.gr/Investors/ContactInfo/).

B. Social Media Channels

In recent years, social media have become an important channel for communication and information dissemination. Leveraging the role of social media in disseminating information related to the Company's image and reputation among the wider public and stakeholders, the Company promotes its presence on social media platforms as a communication channel, with the aim of encouraging engagement and strengthening the sense of belonging among the wider public and its stakeholders, while complying with the applicable legislative and regulatory framework regarding the protection of confidential information and corporate interests.

C. General Meeting of Shareholders

The Company ensures the lawful convening of the General Meeting of Shareholders, in accordance with the requirements of Law 4548/2018 and the relevant provisions of the Articles of Association. In this context, the Company is required to maintain mechanisms that ensure the timely invitation of shareholders to the General Meeting, in accordance with the provisions of the law and the Articles of Association, as well as the safeguarding of minority shareholders' rights.

Furthermore, the Company is required to ensure that all information documents relating to the agenda items are made available in a timely manner and are easily accessible, in order to provide shareholders with comprehensive information, and to facilitate the practical conduct of General Meetings through any appropriate means.

With the aim of ensuring the timely and effective organisation and preparation of General Meeting sessions, the Company applies a Procedure for the preparation and convening of General Meetings, as well as for the actions to be taken following the voting process of the General Meetings.

Through the Invitation to the General Meeting, shareholders are encouraged to monitor the announcements available in the "INVESTOR RELATIONS → SHAREHOLDERS' MEETINGS" section (https://www.eydap.gr/Investors/GeneralMeetings/).

Pursuant to Article 28 of the Company's Articles of Association, any person holding shareholder status at the beginning of the fifth day prior to the date of the initial meeting of the General Meeting may participate in the General Meeting, subject to the conditions set out in the applicable legislation, either in person or through a representative.

The Company's Articles of Association provide shareholders with the possibility, following a relevant decision of the Board of Directors, to participate remotely in the General Meeting through audiovisual or other electronic means, without physical presence. In such cases, the Company takes adequate measures to ensure that participants have the ability to follow the proceedings of the General Meeting electronically or through audiovisual means, to address the General Meeting orally or in writing during the remote session, and to vote on the items of the agenda.

The Company's Board of Directors encourages dialogue with shareholders and takes their views into consideration when preparing the agenda items of the General Meeting. The Shareholder Services and Corporate Announcements Department is responsible for providing shareholders with direct, accurate and equal access to information, as well as for supporting them in the exercise of their rights, in accordance with the provisions set out in Section D below.

In particular, during the General Meeting, the Company's Management is required to provide shareholders with the requested information, provided that such information relates to the items on the agenda and is useful for the actual assessment of those items. Furthermore, the Company's Management is required to respond promptly and adequately to shareholders' requests and questions, in accordance with the provisions of Law 4548/2018 and the Articles of Association.

In the event that, and to the extent that, shareholders' questions relating to the items on the agenda are not answered during the General Meeting due to lack of time or any other reasonable cause, the Company shall provide the relevant responses by electronic correspondence, namely to the email addresses provided by the shareholders and maintained in the records of the Company's Shareholder Services and Corporate Announcements Department, subject to the provisions on the protection of personal data.

In cases where the information requested concerns the entire investment community or a broad group of shareholders, the Company, in addition to responding to the specific shareholder who submitted the request for information, shall also ensure equal access to such information by publishing a relevant corporate announcement.

If the information requested during the General Meeting is already available on the Company's website, the Chairman of the General Meeting may refer shareholders to the published information.

In the event of refusal to respond to a shareholder's request for information, a specific and duly substantiated justification shall be recorded in the minutes of the General Meeting.

D. Role and responsibilities of the Shareholder Services & Corporate Announcements Department

D.1. Main Responsibilities

The Shareholder and Corporate Announcement Department of the Communications and Corporate Affairs Division, which reports administratively and operationally to the Company's Chief Executive Officer, operates as an open, permanent and transparent channel of communication with all shareholders, with the aim of providing them with immediate, accurate and equitable information, to enable them to submit questions and/or proposals to the Company's Management, and to provide them with ongoing support in exercising their rights in accordance with the law and the Articles of Association.

The main responsibilities of the Shareholder and Corporate Announcement Department are:

➢ Facilitating communication with shareholders in every appropriate way.

➢ Overseeing the proper and effective functioning of communication channels.

➢ Monitoring the Company's website to ensure the accuracy of the information published, insofar as it relates to the responsibilities of this department.

➢ Receiving and recording any complaints raised by the Company's shareholders and taking action to address them.

➢ Maintaining an organized record of the Company's correspondence with its shareholders.

➢ Keeping shareholders informed through corporate announcements, particularly regarding corporate events in accordance with the provisions of Law 4548/2018 and Law 4706/2020.

➢ The distribution of dividends.

➢ Communication with the Hellenic Capital Market Commission and Euronext Athens on matters falling within the remit of the Shareholder and Corporate Announcements Department.

➢ Distributing all the Company's published documents (prospectuses, interim and annual financial reports, etc.) to all interested parties.

➢ Responsibility for ensuring the Company complies with the decisions of the Hellenic Capital Market Commission relating to corporate announcements and disclosures.

D.2. More specific obligations

(a) Preparation and Conduct of General Meetings:

In particular, with regard to the preparation and conduct of General Meetings, the Shareholder Services and Corporate Announcements Department is responsible for:

(a) providing shareholders with information regarding General Meetings and the resolutions adopted at them,

(b) communicating and exchanging data and information with the Central Securities Depository and intermediaries, for the purposes of shareholder identification,

(c) monitoring the exercise of shareholders' rights, in particular with regard to shareholders' attendance rates and the exercise of voting rights at General Meetings,

(d) the publication of all relevant corporate announcements,

(e) such matters as are specifically provided for in the legislation in force at the time, in the Company's Rules of Procedure and in the Procedure Manual for the preparation and convening of General Meetings.

Where the Shareholder and Corporate Announcements Department receives a request to exercise collective and individual minority rights, in accordance with Article 141 of Law 4548/2018, it shall be forwarded without delay to the Chairman of the Board of Directors and the Company Secretary.

(b) Disclosure/Publication Obligations:

i. Disclosure of significant shareholdings – Law 3556/2007

The Shareholder and Corporate Announcements Department, in accordance with the provisions of Law 3556/2007, receives notifications and publishes all necessary information concerning significant changes in the voting rights holdings of persons subject to the obligations set out in the aforementioned law.

In particular, it publishes all the information contained in the notification referred to in paragraph 1 of Article 14 of Law 3556/2007 and in Article 11 of the aforementioned law, which it receives from the persons subject to the obligation. Such disclosure shall take place immediately upon receipt of the relevant notification and, in any event, no later than within two (2) trading days from the date of such receipt. The Company must be notified in writing as soon as possible and, in any event, no later than within three (3) trading days following the date on which the shareholder or the person referred to in Article 10 of Law 3556/2007:

- is informed of the acquisition or disposal of, or the possibility of exercising, voting rights; or
- taking into account the circumstances of each case, ought to have been informed of the acquisition or disposal of, or the possibility of exercising, voting rights, irrespective of the date on which the acquisition or disposal takes place or the exercise of voting rights becomes possible; or
- is informed of an event referred to in paragraph 3 of Article 9 of Law 3556/2007.

ii. Disclosure of transactions by persons performing managerial duties

In accordance with the obligation introduced by Article 19 of Regulation (EU) No 596/2014, persons discharging managerial responsibilities, as well as persons closely associated with them, shall notify the Company of any transaction carried out for their own account relating to the shares or debt securities of the Company or of its affiliated undertakings, or to derivatives or other related financial instruments.

These notifications must be made immediately and no later than three (3) working days after the transaction date. Persons subject to the reporting obligation must report each transaction once the total value of their transactions reaches twenty thousand euros (€20,000) within one (1) calendar year. The threshold of twenty thousand euros (€20,000) is calculated on the basis of the sum of the value of all transactions carried out within the calendar year, without offsetting purchases against sales.

The Shareholder and Corporate Announcements ensures that the information disclosed as set out above is published immediately and, in any event, no later than three (3) working days after the transaction, in a manner that allows rapid access to such information and, in particular, for: (a) the publication of the relevant information on the Company's official website (www.eydap.gr) and its retention for a period of at least five years; (b) the submission of the information to the Athens Stock Exchange via the 'ERMIS' system or, in the event of a technical problem, by any appropriate means (such as email); and c) the publication of the information on financial news websites which, in the Company's judgement, ensure the immediate and effective dissemination of the information to the investing public.

(c) Compliance with the obligations laid down in Article 17 of Regulation (EU) No 596/2014:

The Shareholder and Corporate Announcements Department compiles and maintains, in electronic form, a list of all persons who have access to inside information (Insider List), in accordance with the provisions of the current Policy and Procedure for the Management of Inside Information and the Prevention of Market Abuse. It is also required to update the list immediately and to forward it to the Hellenic Capital Market Commission as soon as possible upon request.

The list of persons in possession of inside information is maintained and updated in accordance with the provisions and templates set out in the Implementing Regulation (EU) 2022/1210 of 13 July 2022, as well as the Guidelines of the Hellenic Capital Market Commission and the provisions set out in detail in the Company's Operating Regulations and the above Policy.

Furthermore, under the supervision of the Shareholder and Corporate Announcement Department, the persons subject to these obligations acknowledge in writing their legal and regulatory obligations in relation to the securities of the Company or its affiliated companies and are made aware of the penalties imposed in the event of insider dealing and the unlawful disclosure of inside information, and shall submit a relevant declaration in accordance with the provisions of the Company's Rules of Procedure.

Where information is assessed as inside information, following the procedure set out in the relevant Policy, the Chief Executive Officer shall decide on the disclosure

the inside information, which he/she shall communicate to the Head of the Shareholder Services and Corporate Announcements Department for the necessary disclosure procedures, in accordance with Article 20 of Law 4706/2020.

Finally, as part of the above obligations, the Shareholder and Corporate Announcement Department monitors the transactions of persons who have access to inside information and hold shares in the Company; and, should a transaction be identified which falls within the scope of the disclosure rules, it notifies the Internal Audit Division and the Regulatory Compliance Division.

D.3. Exclusive responsibility for disclosing information to Shareholders/Investors

To ensure the accuracy and correctness of the information received by shareholders/investors from the Company, the responsibility for disclosing the relevant information and supporting the exercise of their rights lies exclusively with the Head of the Shareholder Services & Corporate Announcements Department and the Director Director of Financial Analysis and Investor Relations; no other employee of the Company, in particular those not authorised by the aforementioned persons, is permitted to engage in any interaction with shareholders or investors. In the event that a shareholder, investor or analyst contacts executives other than those mentioned above, they are obliged to forward the request to the Shareholder and Corporate Announcement Department and/or the Financial Analysis and Investor Relations Division.

Following an assessment of the nature and significance of the requests/concerns raised by shareholders/investors, the above executives may forward the requests to the Chief Executive Officer with a view to ensuring the accuracy of the information provided and safeguarding the company's interests.

The Company makes every reasonable effort to respond to shareholders' requests without undue delay and within a reasonable timeframe, depending on the nature and complexity of the request.

E. Communication between the Management and Shareholders

The Company recognizes the importance of shareholder engagement and maintains a structured framework for communication and dialogue with shareholders and the investment community, with the aim of understanding their views on strategic and sustainability issues (ESG), including environmental issues, social responsibility, corporate governance, infrastructure resilience, water resource management, cyber security and climate risk management.

As part of efforts to strengthen dialogue with shareholders, the Chief Executive Officer communicates with and keeps informed those shareholders holding shares representing more than 5 per cent of the share capital on matters of significance to the Company. In this context, the Chief Executive Officer may send a letter on a regular basis to these shareholders, inviting them to submit any comments or queries regarding their rights and/or the Company. At the same time, the letter may also contain specific questions for the shareholders, which may be raised by members of the Board of Directors whenever deemed necessary.

The letter is sent to the contact address provided by the shareholder to the Company and is kept on file by the Shareholder and Corporate Announcement Department.

Once replies to the letter have been received, the Chief Executive Officer, in collaboration with the Chairman of the Board of Directors, shall – with the assistance of the Shareholder Services & Corporate Announcements Department - to assess them and may, if they raise issues of significant importance to the Company's operations, invite shareholders to a dialogue (via electronic means) during which the relevant concerns and issues, as well as any other matters of general interest to shareholders, will be discussed.

The Board of Directors is briefed by the Chief Executive Officer on the results and conclusions of the above engagement with shareholders.

F. Events and Meetings with Investors and Analysts

The Company organizes meetings and events with investors and analysts for the purpose of presenting and promoting itself. These events are held in accordance with the principle of equal treatment of shareholders. In addition to announcements and posts on the Company's website, the Company seeks to maximize and enhance the provision of information to shareholders and investors regarding its business environment and strategy through the aforementioned meetings and events.

During meetings, presentations and other forms of communication with investors, analysts or other market participants, the Company does not provide privileged, confidential or undisclosed information. In the event of the inadvertent disclosure of information constituting inside information within the meaning of Regulation (EU) No 596/2014, the Company shall take the necessary disclosure measures in accordance with applicable legislation and the relevant Policy.

4. Approval and Revision – Final Provisions

This Policy is approved and reviewed by the Board of Directors.

The Board of Directors is responsible for assessing the adequacy and effectiveness of the mechanisms for communicating with shareholders, which form a cornerstone of the corporate governance system.

The Policy is available on the Company's website.

The Company may include in its annual Corporate Governance Statement a summary of the key communication and dialogue activities with shareholders and investors that took place during the financial year.