



Conflict of Interest Policy

Approved by the Board of Directors of the Company on 21.02.2022

Introduction

This policy is designed to enhance public confidence in the integrity of the Company and protects its interests regarding the management, monitoring and recognition of conflicts of interest that may arise in the course of its activity.

For the preparation of this Policy, the Group has taken in to account the legislative framework as defined below and as incorporated into national law, in accordance with the applicable provisions:

- Directive 2014/65/EU: Articles 16 (3), 23 (1 & 2)
- Law 4548/2018: article 97
- Law 4706/2020: article 14

Definitions

- "Company" means the company "EPSILON NET SA".
- "Group" means the group of companies of EPSILON NET SA, i.e. the Company and its controlled companies or otherwise "subsidiaries".
- "Policy" means this Conflict of Interest Policy.
- "Employees" means the Directors, decision-makers, senior executives, all employees and external partners who provide services to the Group.

Purpose

This policy provides guidance and instructions to the members of the Board of Directors, employees and executives of the company, so as to ensure that business decisions are not influenced by personal interests.

The conflict of interest policy:

- Records situations in which conflicts of interest may arise detrimental to the interests of the Group's clients.
- Establish and implement procedures, mechanisms and systems for managing conflicts of interest.

- Designs and implements procedures and systems to prevent and prevent possible damage to clients' interests from any conflict of interest
- Complies the company with the applicable regulatory and regulatory framework for situations of conflict of interest
- Identifies the conflict of interest and its accusations, encourages the confidential reporting of any incident or reasonable suspicion, through the available communication channels established by the Group, and promotes the awareness and vigilance of employees and partners to identify actions related to situations of conflict of interest.

Scope

This Policy applies to all workflows, activities and services provided by the Group's companies. It concerns all the Personnel of the Group's companies and their closely related persons.

The Policy also applies to the Group's companies based abroad, which may need to adapt to individual issues due to local regulatory and regulatory framework.

Definition of conflict of interest

A conflict of interest arises when an employee is called upon to serve his own interests (financial and/or other), or the interests of a person (natural or legal) directly or indirectly linked to him by a relationship of control, in a way that competes with the interests of the Group.

Specifically, "conflict of interest" means any situation in which a set of circumstances creates the risk that professional/managerial judgments or actions concerning a primary interest such as the duty of loyalty to the interests of the Company may be impermissibly influenced by a secondary interest or duty.

It includes any case, professional or personal, which could potentially unfairly affect a person's ability to assess a situation, or to decide independently and impartially and which has the potential effect of harming the interests of the Company.

General Principles - Guidelines

We are obliged to act in the interest of our Group companies as well as to avoid and detect behaviors that may lead to any form of conflict of interest. We apply this conflict of interest policy and ensure that those acting on our behalf also comply.

We avoid any conflict of interest, even the impression of creating a conflict of interest, as this could cause a problem for the Group and jeopardize its credibility.

We conduct our personal and other activities outside the Group in a way that does not conflict or create the impression that it conflicts with the interests of our Group.

In case there is a conflict of interest, we report it promptly to our immediate supervisor or Human Resources Department. In particular, we communicate to them:

- Identified existing situations of conflict of interest
- Any connection/relationship or significant financial interest we have with persons or companies with which the Group cooperates and could lead to a conflict of interest
- Other situations that may give rise to a conflict of interest.

Any situation where a close relative of ours works, provides services or has a significant financial interest in a competitor, supplier, customer or other businesses with which our Group does business.

- If we perform administrative duties in the Group, we are obliged to inform the Management of cases where our business or professional activities, agreements or partnerships may lead to conflicts between our own interests and the interests of the Group.

Classification of conflicts of interest

The Group uses a set of procedures to prevent any conflict of interest.

Covered persons must also be prepared to manage potential perceived conflicts of interest that may harm clients' interests.

For the purpose of identifying conflicts of interest that arise, this policy seeks to ensure, on the basis of specific and defined criteria and procedures, that the covered person or related control person is in one of the following situations:



- It is possible to make a financial gain or avoid financial loss, at the expense of the customer
- Has (as to the outcome of a service provided to the client or a transaction carried out on his behalf) an interest that is different from the client's interest in that outcome
- Has a financial or other incentive to favor the interests of another client or other group of clients, to the detriment of the interests of the client
- Receives or will receive from a third party, consideration related to a service provided to a customer, in the form of money, goods or services, in addition to the usual commission

This Policy categorizes and covers conflicts of interest that may arise in the following cases:

- Conflicts between the interests of Group companies and the interests of a client or group of clients.
- Conflicts between the interests of one client or group of clients and the interests of another client or group of clients.
- Conflicts between the interests of Group companies and/or customers and an employee or group of employees of Group companies.