



Related Party Transactions Policy

EPSILON NET A.E. strictly follows the applicable legislation regarding the transparency and supervision of transactions with related parties, the granting of a license for the preparation of transactions with related parties, as well as the publicity of these transactions, fully implementing the provisions of Law. 4548/2018.

According to the provisions of articles 99 - 101 of Law 4548/2018, contracts of the Company with related parties, as well as the provision of collateral and guarantees to third parties in favor of related parties, are permissible and valid only after special permission provided by decision of the Board of Directors or, under the terms of article 100 of Law 4548/2018, of the General Meeting of shareholders, with the exception of transactions listed in paragraph 3 of article 99 of Law 4548/2018. Related parties, in relation to the Company, are considered to be the members of the Board of Directors, the persons who control the company, the close family members of these persons, as defined in Annex A of Law 4308/2014, as well as the legal entities controlled by the above. A natural or legal person is considered to control the company, if one of the cases of article 32 of Law 4308/2014 applies.

In addition, the Governing Council announces the granting of authorization to enter into a related party transaction in accordance with Article 101(1). 2 of Law 4548/2018.

Within ten (10) days from the publication of the announcement of the granting of a license by the Board of Directors pursuant to paragraph 2 of article 101 of Law 4548/2018, shareholders representing one twentieth (1/20) of the capital may request the convening of a general meeting to decide on the issue of granting the license.

The Company's contract with related parties, as well as the provision of a guarantee or security, for which permission was granted by the Board of Directors is considered definitively valid only after the expiration of the ten (10) day deadline or the receipt of the permission by the general meeting or the written statement of all shareholders to the company that they do

not intend to request the convening of the general meeting (article 100 par. 3 of Law 4548/2018).

Subsequently, the Board of Directors announces the lapse of the deadline of paragraph 3 of article 100 of Law 4548/2018.

The announcements of the Board of Directors shall include at least information: (a) as to the nature of the company's relationship with the related party, (b) the date and value of the transaction, (c) any other information necessary to assess whether the transaction is fair and reasonable for the company and the persons who are not related parties, including minority shareholders. The transaction concluded between the person connected with the company and its subsidiary shall also be subject to those disclosure formalities.

The Legal Services Department of EPSILON NET S.A. is responsible for drawing up and auditing contracts and detecting any transactions with related parties. In particular, during the process of drafting contracts, the Legal Services Directorate checks and verifies whether a specific contract falls within the scope of the provisions of articles 99 - 101 of Law 4548/2018. In a positive case, it immediately informs the Group's Financial Services Department and the Boards of Directors of the "involved" parties and initiates the procedure of articles 99 - 101 of Law 4548/2018, as described above.