



ATHENS
INTERNATIONAL AIRPORT
ELEFThERIOS VENIZELOS

Summary of the Company's Operation Regulation Athens International Airport S.A.

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1. Introduction

Athens International Airport S.A. (AIA), established by Law 2338/1995 operates in accordance with the provisions of the Airport Development Agreement (ADA) as ratified by the above referred law as amended and in force by Law 4594/2019 and Law 5080/2024. AIA, while being a public utility, operates as a société anonyme in the private sector. It exclusively manages all facets of Athens International Airport "Eleftherios Venizelos", encompassing design, finance, construction, operation, and development. AIA's main goals include managing Airport's smooth operation and development, providing airport facilities and services so as to accommodate, inter alios, passengers and airlines operating at the Airport and further, providing services by third parties, including the provision of catering, ramp and cargo handling services. It also ensures the implementation of the Airport Development Agreement, meeting all related obligations and rights.

2. Abbreviations

Term/ Abbreviation	Definition of Term/ Abbreviation
Board of Directors / BoD	The Board of Directors of the Company
Company / AIA	The Company under the name "ATHENS INTERNATIONAL AIRPORT S.A." and the brand name "ATHENS INTERNATIONAL AIRPORT ELEFTHERIOS VENIZELOS"
GM	General Meeting of the Shareholders
HCGC	Hellenic Corporate Governance Code
ICS	Internal Control System of the Company
Regulation	Operation Regulation of the Company according to art. 14 of L. 4706/2020

3. Scope of the Operation Regulation

The Regulation, aligned with Article 14 of L. 4706/2020, incorporates various Greek laws, European Regulations and Directives, and decisions of the Hellenic Capital Market Commission.

4. Significant subsidiaries of the Company

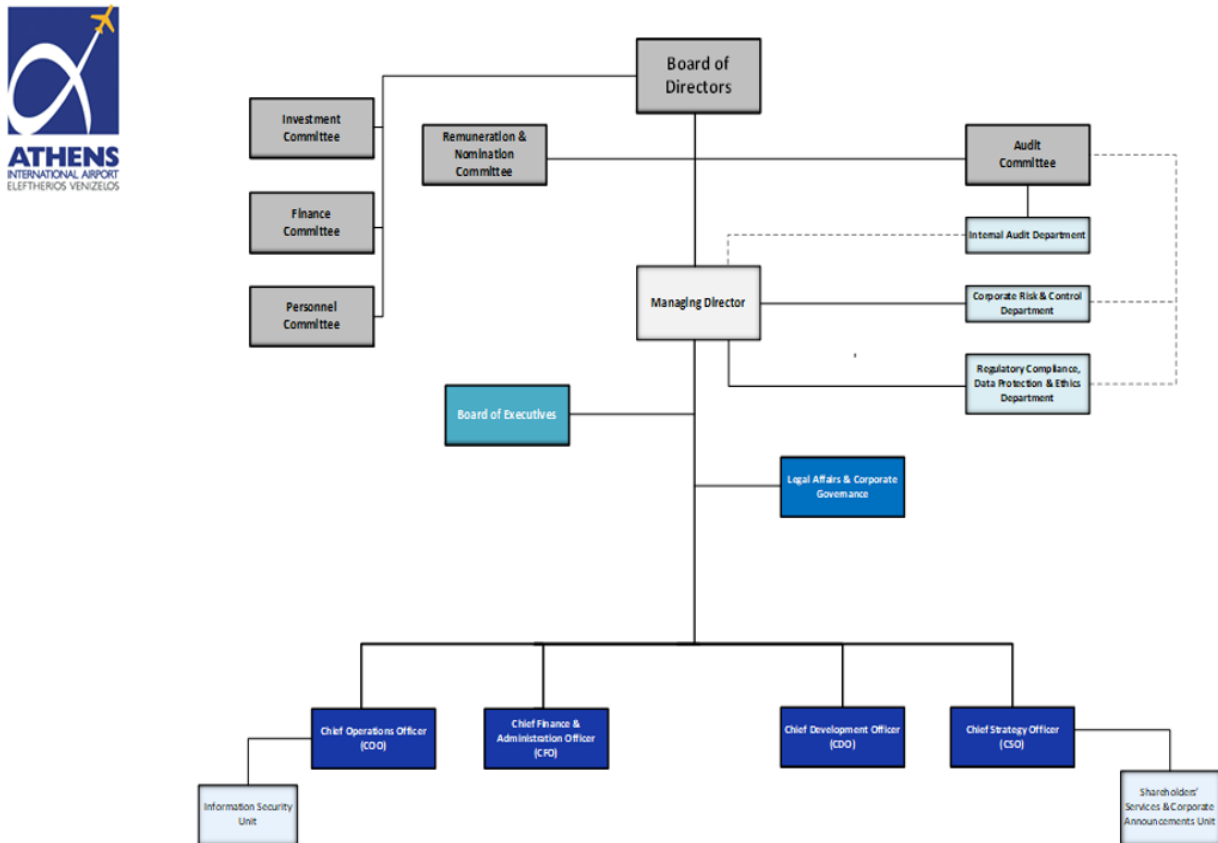
In line with Article 2, sections 16 and 19 of L. 4706/2020, a "significant subsidiary" is defined as a subsidiary under the direct or indirect control of the parent company that can significantly impact the parent company's financial position, performance, business activity, or general economic interests.

Based on this definition, the Company currently does not have any significant subsidiaries.

5. Organisational Structure

5.1 Organisational chart

The organisational structure of the Company is reflected in the organisational chart hereinbelow and is analysed as follows:



5.2 General Meeting

The General Meeting of shareholders is the supreme decision-making body of the Company, binding all shareholders with its decisions. Its primary functions include:

1. Electing Board Members and auditors and setting their fees.
2. Amending the Articles of Association, including share capital changes, dissolution, or mergers.
3. Approving annual financial statements and profit distribution.
4. Approving overall Board management and releasing auditors.
5. Approving the auditors' report.
6. Issuing bond loans as per Law 4548/2018.



7. Appointing liquidators for Company dissolution.
8. Approving remuneration policies and reports.
9. Deciding on matters exclusively under its competence as defined by the Articles of Association or Law 4548/2018.

5.3 Board of Directors

5.3.1 Election, Composition and Term of the Board of Directors

The Company's Board of Directors has thirteen (13) Members, structured as follows:

- Composition: Includes Executive, Non-Executive, and Independent Non-Executive Members as per law.
- Election and Appointment: Members are generally elected by the General Meeting of Shareholders, with HCAP and AviAlliance GmbH having rights to appoint Members based on shareholding as provided in the Articles of Association.
- Alternate Members: Appointed for contingencies under Law 4548/2018.
- Term: Two (2) years, which may be extended until the ordinary General Meeting immediately following the date upon which the term of office would have otherwise expired for the purpose of approving the Company's financial statements of the year in which the term of office expired. In any event, the term of office may not exceed a period of three (3) years.
- Qualifications: Members must meet experience, skill, and suitability criteria, with restrictions on past employment in related fields.
- Re-election/Revocation: Subject to applicable laws.

5.3.2 Election of a Chairperson and a Vice-Chairperson

The Board of Directors elects a Chairperson and a Vice-Chairperson from among its Members, in accordance with the Company's Articles of Association. These individuals must have the requisite experience and skills for their roles. The election occurs at the first Board meeting following the General Meeting that elects the Board Members.

5.3.3 Meetings of the Board of Directors

The Company's Board of Directors meets as necessitated by law, the Articles of Association, or company needs. Meetings can occur anywhere, provided all Members are present or represented and consent. Teleconferences are allowed, especially for Members in different locations or due to circumstances like illness. The Chairperson or Vice-Chairperson schedules meetings, with invitations sent at least two (2) business days in advance, or five (5) for meetings outside the Company's location. If two directors request a meeting, it must be convened within seven (7) days; otherwise, they may convene the meeting themselves by providing a relevant invitation to the remaining Members of the Board of Directors. Invitations include all meeting



details and are sent electronically or by courier for international Members. Decisions on non-agenda items require unanimous consent from present or represented Members.

The Board's legal adviser attends all voting sessions.

5.3.4 Powers of the Board of Directors

The Board of Directors manages the AIA's corporate affairs, with responsibilities including:

- Legal Representation: Handling court representations, legal actions, and arbitration.
- Property and Contracts: Granting property rights, managing contracts, and oversees and approves results or stages resulting from tender procedures as the case may be.
- Employment Matters: Hiring, setting remuneration, and granting powers of attorney.
- Financial Management: Overseeing security, borrowing, and financial instruments as provided in the Articles of Association.
- Financial Oversight: Managing expenses, record-keeping, and financial reporting.
- Internal Regulation: Regulating internal operations and managing corporate interests.

Under Law 4706/2020, the Board also:

- Oversees Corporate Governance: Appoints, supervises, and evaluates the Corporate Governance System every three (3) years.
- Manages ICS: Ensures effective operation of the Internal Control System, covering business strategy, risk management, audit operations, data accuracy, and regulatory compliance.
- Ensures Transparency: Maintains updated curricula vitae of Board Members.

5.3.5 Responsibilities of the Board of Directors

Members of the Board of Directors and Company Executives are barred from engaging in activities or professions that compete with the Company's objectives in Greece. Violations can lead to compensation claims by the Company and possible replacement of the offending Board Member. Details about Board Members, including their roles and curricula vitae, are publicly accessible on the Company's website. Comprehensive information about the Board's functioning, organization, and Member responsibilities is provided in the Board of Directors' Charter.

5.4 Chairperson of the Board of Directors

The Chairperson of the Board of Directors' duties are governed by the Company's Articles of Association and Greek Law 4548/2018.



5.5 Vice Chairperson of the Board of Directors

In the absence or inability of the Chairperson, the Vice-Chairperson assumes the Chairperson's duties. If the Chairperson is an Executive Member and the Vice-Chairperson is Non-Executive, the Board must appoint another Member to fulfil the Chairperson's Executive responsibilities.

5.6 Managing Director (CEO)

The Managing Director, under the Board of Directors' oversight and as stated in the Company's Articles of Association, handles the Company's daily management and operations. As an Executive Board Member, he/she reports to the Board, implementing strategic decisions and important company choices. In crisis situations or when significant business decisions are needed, especially those impacting the Company's financial situation, Executive Members must promptly inform the Board in writing, providing assessments and proposals. The roles of General Manager (as defined in the ADA) and Managing Director (CEO) are held by the same individual.

5.7 Executive Members of the Board of Directors

Executive Members of the Board of Directors are chiefly tasked with implementing the Company's strategy as set by the Board and regularly consult with Non-Executive Members on its suitability. In crises, high-risk situations, or when actions likely to significantly impact the business and financial stability are needed, Executive Members must promptly inform the Board in writing, providing a report with their assessments and recommendations, either individually or collectively.

5.8 Non-Executive Members of the Board of Directors

Non-Executive Members of the Board of Directors oversee the execution of Board decisions and tasks assigned by the Board. Their specific responsibilities include: a) Monitoring the Company's strategy, its implementation, and objective achievement. b) Supervising Executive Members, including performance evaluation, with annual or as-needed meetings without Executive Members to discuss their performance. c) Reviewing and providing input on proposals from Executive Members. Non-Executive Members also engage with Senior Management through presentations by Chief Officers and Heads of Units and Departments during Board meetings or as required.

5.9 Independent Non-Executive Members of the Board of Directors

Board Members are considered independent if they hold less than 0.5% of the Company's shares and have no relationships affecting their impartiality. Dependency primarily arises from significant remuneration or business relationships with the Company or related entities, and long-term service or close familial ties to Senior Executives. The Board ensures compliance with these criteria and reviews the independence of Members annually. If a Member no longer meets these criteria, the Board acts for replacement.



Independent Members may submit reports to the General Meeting, and their presence is required for quorum at Board meetings discussing financial statements or decisions needing increased quorum and majority as per Law 4548/2018.

5.10 Company Secretary

The Board of Directors appoints its Secretary by an absolute majority of present or represented directors, typically the Director of Legal Affairs and Corporate Governance. The Corporate Secretary, a qualified and experienced individual, supports the Board and its Committees in compliance with internal procedures, laws, and regulations. Responsibilities include ensuring the Board's prompt and comprehensive information, integrating new Members, organizing General Meetings, facilitating shareholder communication with the Board, and aiding Board communication with Senior Executives.

5.11 Board of Directors Committees

5.11.1 Audit Committee

The Audit Committee operates under article 44 of Law 4449/2017, Law 4706/2020, EU Regulation No. 537/2014, the Hellenic Corporate Governance Code, the Company's Operation Regulation and the Charter of the Audit Committee. Comprising three Members, mostly independent, as per the Articles of Association, it is defined by the General Assembly of the Shareholders.

Its role includes overseeing governance, risk management, internal control, and providing advice on:

1. Internal Control System adequacy.
2. Risk Management effectiveness.
3. Risk assessment and Board risk appetite setting.
4. Business Continuity and airport risk categories.
5. Oversight of internal and external audit activities.
6. Ensuring external auditors' independence.
7. Managing the selection process for external auditors.
8. Integrity and accuracy of Financial Statements.
9. Business ethics and sustainability reporting.
10. Compliance, data protection, and ethics processes.

The Committee offers independent advice to the Board, which may request special investigations.



The Chairperson, who must be independent, coordinates meetings, sets agendas, and ensures effectiveness, while informing the Board post-meetings.

The Committee's Charter, detailing its organization, responsibilities, and operation, is approved by the Audit Committee and the Board and is available on the Company's website.

5.11.2 Remuneration and Nomination Committee

The Remuneration and Nomination Committee, a single Board Committee as per Law 4706/2020, handles remuneration and nominations for the Board of Directors. It focuses on attracting, retaining, and incentivizing suitable Board Members to meet shareholder expectations and the Company's strategic goals. The Committee also designs and oversees the remuneration framework for key personnel, in line with Law 4548/2018 and the Company's Articles of Association.

Composed of three (3) Non-Executive Board Members, with at least two (2) being Independent Non-Executive Directors, the Committee's Chairperson is an Independent Non-Executive Director. The Committee's responsibilities, shaped by the Company's specific circumstances and legal framework, include managing recruitment, retention, evaluation, and remuneration of Board Members, and deciding on the Managing Director (CEO) and Manager of Internal Audit Department's remuneration. The Committee also evaluates the Suitability Policy criteria.

The Chairperson coordinates meetings, sets agendas, and ensures the Committee's effectiveness, while providing brief updates to the Board after each meeting. The Committee operates under a Charter, outlining its organization, responsibilities, and operation, approved by the Committee and the Board, and available on the Company's website.

5.11.3 Other Committees of the Board of Directors

These committees, i.e., the Investment Committee, the Finance Committee, and the Personnel Committee, are advisory in nature and provide specialized knowledge. They thoroughly discuss relevant issues and make recommendations to the Board of Directors. The responsibilities and advisory authority of these committees are clearly defined.

Additionally, the Board of Directors has the discretion to establish other committees as needed, determining their names, composition, purpose, and chairs. The chairs for committees focused on unique, non-recurring topics are appointed by the Board of Directors. Members of these committees are chosen from the Board of Directors, who also elect the committee chairs. These chairs can be re-elected, and other Board Members may attend committee meetings. The Managing Director is required to be present at all committee meetings.

The tenure of these committees is tied to the tenure of the Board of Directors, and the Board retains the authority to modify the composition of these committees as it sees fit.



5.11.4 Investment Committee

This committee plays a crucial advisory role, assisting both the Board and Management. Its primary responsibilities include:

1. Advising on the annual Capital Expenditure Programme, which covers budgeting and progress tracking.
2. Guiding the organization's multi-year investment plan.

The Investment Committee is responsible for reviewing these areas and providing independent advice and guidance to the Board of Directors.

Regarding its composition, the Investment Committee is a subset of the Board and includes three (3) Non-Executive Board Members. One (1) of these Members is appointed as the Chairperson. The specifics of the Committee's operations are detailed in its Charter, approved by the Company's Board of Directors and in line with the Articles of Association.

5.11.5 Finance Committee

Key aspects of the Finance Committee's role include:

1. **Advisory Function:** The Finance Committee assists the Board and Management by providing advice and guidance on various financial aspects of the Company. This includes the review and assessment of the Company's annual operating budget, quarterly latest estimates, annual and interim financial results, updates to the Company's business plan, and any other financial activities as determined by the Finance Committee.
2. **Collaboration with the Audit Committee:** The Finance Committee may conduct joint meetings with the Audit Committee as necessary.
3. **Independent Guidance:** It reviews the aforementioned items and offers independent advice and guidance to the Board of Directors.
4. **Composition:** The Finance Committee is comprised of three (3) Members of the Board of Directors (BoD).

Specifics regarding the operation of the Finance Committee are detailed in its Charter, approved by the Company's Board of Directors and in line with the Articles of Association.

5.11.6 Personnel Committee

The key functions of this committee include:

1. **Advisory Role:** The Personnel Committee assists the Board and Management by advising on various initiatives related to human resources and personnel management. These include, among others,;
 - Nominating Chief Officers and setting their terms of employment.



- Assessing the compensation policy as revised periodically by Management.
- Evaluating major HR initiatives, projects, and policies.
- Annually reviewing the collective labour agreement.
- Advising the Remuneration and Nomination Committee on the remuneration of Senior Executives and the Manager of the Internal Audit Department.

2. Independent Guidance: The Personnel Committee reviews the aforementioned areas and provides independent advice and guidance to the Board of Directors.

Consistent with the Company's Articles of Association, the Personnel Committee is a subset of the Board and includes three (3) Non-Executive Board Members.

The Committee's operations are detailed in its Charter, approved by the Company's Board of Directors and in line with the Articles of Association.

5.12 Board of Executives (BoE)

The BoE is composed of Chief Officers and Directors, with the Managing Director (CEO) serving as the chair.

One of the primary functions of the BoE is to approve Management proposals before they are submitted to the Board of Directors, ensuring alignment with the Company's signing authorities.

5.13 Sectors of the Company

In addition to the Management bodies and the committees of the Board of Directors, the Company's structure includes various Sectors and individual Units or Departments. These entities have clearly defined reporting lines and responsibilities.

Senior Executives: The heads of these Sectors are categorized as Senior Executives. For transparency and public information, the curricula vitae of these Senior Executives are made available on the Company's website.

5.13.1 Strategy Sector

The Strategy Sector oversees various organizational Units and project teams, which include Airport Planning, Capital Expenditure planning and monitoring, Sustainability Planning and Reporting, Data Analytics and Traffic Forecast, and External Business.

Under the Managing Director (CEO)'s mandate, the Chief Strategy Officer (CSO) handles strategic projects at both the corporate and Business Unit levels, utilizing internal and external resources as agreed with the Managing Director (CEO).



The Strategy Sector reports directly to the Managing Director (CEO), indicating a high level of importance and strategic alignment within the Company's overall structure.

5.13.2 Operations Sector

The Operations Sector is responsible for coordinating, monitoring, and controlling the development and implementation of mechanisms to achieve financial, operational, quality, and sustainability targets in alignment with corporate goals, particularly for the organizational units under its supervision.

The Operations Sector reports directly to the Managing Director (CEO), indicating its critical role in the overall operational framework of the Company.

5.13.3 Development Sector

The Development Sector provides overall direction and supervision for the Consumers Business Unit, the Property Business Unit, and Technical Services, which includes Major Infrastructure Projects at the Airport.

Furthermore, it coordinates, monitors, and controls the development and implementation of mechanisms to achieve financial, operational, quality, and sustainability targets in alignment with corporate goals, particularly for the organizational units under its supervision and ensures that all staff in the areas under its direction recognize their full potential for development, in cooperation with the HR unit.

The Development Sector reports directly to the Managing Director (CEO), indicating its significance in the Company's overall strategic and operational framework.

5.13.4 Finance & Administration Division

The Finance & Administration Division provides overall guidance for the Corporate Finance and Administration Unit, encompassing financial planning, budgeting, control, accounting, taxation, credit, procurement, insurance, and human resources.

The Finance and Administration Division reports directly to the Managing Director (CEO), signifying its critical role in the Company's financial and administrative management.

5.13.5 Shareholder Services and Corporate Announcements Department

The Shareholder Services and Corporate Announcements Department, reporting to the Chief Strategy Officer, handles key responsibilities including the distribution of dividends and stock awards, management of share-related transactions, communication regarding general meetings, and compliance with relevant securities laws. It oversees treasury share transactions, facilitates shareholder communication, ensures regulatory compliance, particularly concerning shareholder rights and the disclosure of inside information, and manages announcements as per legal requirements. This unit is essential in maintaining the Company's compliance and effective shareholder relations.



5.13.6 Legal Affairs & Corporate Governance Department

The Legal Affairs & Corporate Governance Department of the Company is primarily staffed by in-house attorneys-at-law, including the Director of Legal Affairs & Corporate Governance and other attorneys as needed, all reporting to the Director. The department's mission is to provide legal support to promote the Company's goals and objectives. This includes representing the Company in court, preparing legal recommendations, and offering consultative legal advice.

The Legal Affairs & Corporate Governance Department reports directly to the Managing Director (CEO), signifying its importance in the Company's overall governance and legal framework.

5.13.7 Information Security Unit

The Company's Information Security Unit, reporting to the COO, is responsible for designing and supervising the Information Security strategy in line with the Company's goals and regulatory standards. Key tasks include developing and implementing security policies and procedures, conducting staff training, monitoring cybersecurity measures, overseeing risk assessments, providing Management advice, monitoring regulatory changes, assessing third-party security, and staying abreast of international information security trends and best practices. This unit plays a crucial role in maintaining the Company's cybersecurity and data integrity.

6. Description of the main characteristics of the Internal Control System

The Company's Corporate Governance System, aligned with Law 4706/2020, includes a robust Internal Control System (ICS) that ensures safe and efficient operations. The ICS is built on five (5) key components: the control environment, risk assessment, safeguards, information and communication, and monitoring. It is supported by three specialized departments: Corporate Risk & Control, Regulatory Compliance, Data Protection & Ethics, and the Internal Audit Department. These departments collectively manage risks, ensure regulatory compliance, and maintain the integrity and effectiveness of the Company's governance structure.

6.1 Internal Audit Department

The Internal Audit Department (IAD) of the Company is an independent unit that reports functionally to the Audit Committee and administratively to the Managing Director (CEO). The Manager Internal Audit, appointed by the Board on the Audit Committee's recommendation, is a full-time employee dedicated to audit matters, independent in its role, and not a Board or committee Member.

Key responsibilities of the Internal Audit Manager include:

1. Annual Audit Plan (AAP): Creating and adjusting a risk-based AAP, communicating resource requirements and significant changes to Senior Executives and the Audit Committee (AC).



2. AAP Implementation: Executing each engagement in the AAP with integrity, objectivity, confidentiality, and competency.
3. Follow-up on Engagement Findings: Tracking corrective actions and reporting unimplemented measures to Senior Management and the AC.
4. Proficiency: Ensuring the IAD's collective knowledge and skills meet Charter requirements, staying updated on trends, establishing policies, and ensuring adherence to the International Standards for the Professional Practice of Internal Auditing.

The IAD adheres to The Institute of Internal Auditors' International Professional Practices Framework, including core principles, ethics, and standards. The Internal Audit Manager also attends the Company's Annual General Meeting, cooperates with the Hellenic Capital Market Commission, and facilitates its monitoring and supervision tasks. The IAD's Charter, approved by the Board and recommended by the AC, details its organization and operation.

6.2 Corporate Risk & Control Department

The Corporate Risk & Control Department of the Company, operating under Law 4706/2020, independently manages and monitors risks. Reporting to the Managing Director (CEO) and the Board via the AC, it ensures risk management aligns with the Company's scale and complexity. Key functions include designing risk management methodologies, preparing policies on significant risks, enhancing transparency and accountability in management, and informing the Board about risks and controls. The department, led by Manager Corporate Risk & Control appointed by the CEO, focuses on uniform risk management practices, particularly in aviation. Its activities are governed by a Charter, annually reviewed and updated by the AC and the Board.

6.3 Regulatory Compliance, Data Protection & Ethics Department

The Regulatory Compliance, Data Protection & Ethics Department, an independent unit within the Company, ensures compliance with legal and regulatory frameworks, including GDPR and whistleblowing laws. Functionally separate from other divisions and supported by Senior Management, it focuses on three (3) key areas: Regulatory Compliance, Data Protection, and Ethics. The Department Manager, reporting to the CEO and overseen by the AC, ensures independence in operations. The Department follows a Charter, subject to annual review and potential revisions by the Manager, with changes approved by the AC.

7. Policies and Procedures

The following Policies and Procedures form an integral part of the Company's Regulation. Thus, the Company complies with the provisions of article 14 of Law 4706/2020, according to which the minimum provisions required to be included in the Regulation are reflected.



7.1 Procedure for the Recruitment and Performance Evaluation of Senior Executives

The Company has implemented a Procedure for the Recruitment and Performance Evaluation of Senior Executives, in line with article 14 of Law 4706/2020. This procedure is designed to enhance the quality of human resources, recognizing them as crucial for achieving the Company's goals. It establishes a coherent and effective framework for both recruiting new Senior Executives and conducting transparent, appropriate evaluations of current ones. The procedure outlines specific steps for these processes and is a key part of the Company's Regulation.

7.2 Compliance Procedure for Persons Discharging Managerial Responsibilities and Persons Closely Associated with them arising from the provisions of Article 19 Of Regulation (EU) 2014/596

The Company has established a Compliance Procedure for individuals with managerial responsibilities (as defined in Article 3 of Regulation (EU) 596/2014) and their close associates (as per Article 2 of Law 4706/2020). This procedure addresses obligations under Article 19 of Regulation (EU) 596/2014. Its primary goal is to ensure that these responsible persons adhere to their obligations as outlined in the regulation. Key aspects include informing these individuals about their duties and maintaining an updated list of Responsible Persons in compliance with Article 19. This Procedure is a crucial part of the Company's Regulation.

7.3 Procedure for the disclosure of any dependency relationship between the Independent Non-Executive Members of the Board of Directors and persons closely associated with them

The Company adheres to a specific procedure for disclosing dependency relationships involving Independent Non-Executive Members of the Board of Directors and persons closely associated with them. This procedure underscores the crucial role of these Independent Non-Executive Members in ensuring transparent, impartial, and objective oversight of the Company's Management and the effective functioning of the Board.

The key aim is to maintain the integrity and independence of these Members throughout their tenure, particularly in decision-making processes within the Board and its Committees. This involves adhering to defined Independence Requirements. The procedure outlines the process for assessing the fulfilment of these Independence Requirements by the Independent Non-Executive Members and for disclosing any dependency relationships they or their closely associated persons might have.

This procedure, forming a vital part of the Company's overall Regulation.



7.4 Procedure for compliance with the obligations arising from Articles 99 through 101 of Law No. 4548/2018 regarding Transactions with Related Parties

The Company has developed a Procedure for Compliance with Related Parties Transactions, aligned with Article 14 of Law 4706/2020 and addressing obligations from Articles 99 to 101 of Law 4548/2018. This procedure is designed to manage the recognition, monitoring, and disclosure of transactions the Company undertakes with its related parties. It details the necessary steps for engaging in transactions with related parties, considering applicable exceptions. This comprehensive procedure is included as Annex 4 in the Company's Regulation, ensuring adherence to legal requirements in related party transactions.

7.5 Policy for the Prevention and Management of Conflict of Interest

The Company has implemented a Policy for the Prevention and Management of Conflict of Interest. This policy outlines the procedural framework for identifying, preventing, and managing situations of conflict of interest, which can affect not only the Company but also its clients and business partners, such as suppliers. The aim of this policy is to establish an effective Corporate Governance System and to provide a comprehensive approach for handling potential conflicts of interest. This policy is crucial for maintaining transparent and ethical business practices.

7.6 Corporate Compliance Policy

The Company has formulated a Corporate Compliance Policy, aligned with Law 4706/2020 on corporate governance, relevant decisions of the Hellenic Capital Market Commission, and the Hellenic Corporate Governance Code adopted by the Company. This policy is a formal document that underscores the Management's commitment to adhering to the legal and regulatory framework. It defines the roles and responsibilities of the Company's Management and personnel in their daily operations, emphasising compliance as a core aspect of their duties.

Applicable to all Members of the Company's Management and employees, this Policy reflects the Corporate Compliance Procedures implemented to ensure the Company's adherence to the regulatory framework governing its operations. The Corporate Compliance Policy is a critical component of the Company's Corporate Governance framework, facilitating the setting and achievement of corporate objectives.

7.7 Risk Management Policy

The Company's Risk Management Policy outlines the roles in managing and controlling risks within the organization. It assigns daily operational risk management responsibilities to the Management and the Corporate Risk and Control (COC) Department, which develops a standardized approach to risk assessment, particularly for airport operations. The COC function identifies and mitigates various risks, maintaining independence from operational management. The Board of Directors, via the AC, oversees and monitors these processes. This policy is included in Annex 7, integral to the Company's Regulation.



7.8 Procedure for the Management of Inside Information & Proper Public Disclosure

The Company has implemented a Procedure for the Management of Inside Information & Proper Public Disclosure. This procedure is aimed at ensuring compliance with legal and regulatory frameworks for managing and disclosing inside and other regulated information. Its primary objectives are to provide investors with prompt, accurate, and equitable information, prevent misuse or unlawful disclosure of inside information, and avoid market manipulation. The detailed description of this procedure is provided in Annex 8, making it an essential component of the Company's Regulation.

7.9 Policy and Procedure for the Periodic Assessment of the Internal Control System

The Company's Policy for the Periodic Assessment of the Internal Control System (ICS) ensures compliance with legal and regulatory frameworks, focusing on regularly evaluating and improving the ICS. This policy follows international best practices and includes the assessment of significant subsidiaries. It addresses the implementation of ICS assessments and governance provisions under Law 4706/2020. Details of this policy and its implementation procedure are provided in Annexes 9 and 10, integral to the Company's Regulation.

7.10 Training Policy for the Members of the Board of Directors and Senior Executives

The Company has established a Training Policy for the Board of Directors and Senior Executives as part of its compliance with Article 14 of Law 4706/2020. This policy outlines the framework and governing principles for the training of these individuals. Its main goal is to install a culture of continuous information, education, training, and professional development.

The policy is applicable to all Members of the Board of Directors, including Executive and Non-Executive Members, as well as Independent Members, and extends to the Company's Senior Executives. Detailed in Annex 11, this Training Policy is a crucial component of the Company's Regulation.

7.11 Sustainability Policy

The Company's Sustainability Policy commits to sustainable development by integrating social, environmental, and economic considerations. It includes a Materiality Analysis and an Annual Sustainability Action Plan, defines a governance structure for managing ESG (Environmental, Social, and Governance) issues, and outlines the production and verification of the Annual & Sustainability Report. The policy also sets principles to address current ESG challenges, applicable to all employees. Detailed in Annex 12, this policy is a key part of the Company's Regulation.



7.12 Corporate Governance System (CGS) Regular Assessment Procedure

The Company's Corporate Governance System (CGS) Regular Assessment Procedure, aligning with Article 4 of Law 4706/2020, requires the Board of Directors to periodically, every three (3) financial years, evaluate the implementation and effectiveness of the CGS and address any shortcomings. This procedure is detailed in Annex 13, forming a crucial part of the Company's Regulation.

7.13 Shareholders' Engagement Policy and Procedure

The Company's Shareholders' Engagement Policy and Procedure establish mechanisms for effective communication with shareholders, facilitating their engagement in line with corporate governance laws and regulations. This Policy aims to ensure regular, equal communication and interaction between shareholders and the Board of Directors, promoting fair and equitable treatment of shareholders' interests, protecting corporate interests, and maintaining transparency. This Policy and Procedure are detailed in Annex 14, integral to the Company's Regulation.