

INSTRUCTIONS

FOR DRAWING UP THE LIST OF ALL PERSONS WHO HAVE ACCESS TO INSIDE INFORMATION AND ITS NOTIFICATION TO THE HELLENIC CAPITAL MARKET COMMISSION

According to Article 18 of the Regulation (EU) No. 596/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 April 2014, and the COMMISSION IMPLEMENTING REGULATION (EU) 2022/1210 of 13 July 2022 (which repealed the previous Implementing Regulation (EU) 2016/347), entered in force the obligation for,

- issuers,
- emission allowance market participants,
- auction platforms, auctioneers and auction monitor in relation to auctions of emission allowances or other auctioned products based thereon,
- or any persons acting on their behalf or on their account

to draw up in electronic format a list of all persons who have access to inside information (“Insider List”) and keep them up to date in accordance with a precise format (templates).

Since a variety of inside information can exist within an entity at the same time, Insider Lists should precisely identify the specific inside information to which persons working for the entity had access to (which may include information relating to a deal, a project, an event – including corporate or financial ones -, a publication of financial statements or profit warnings). To that end, the Insider List should be divided into sections with a separate section for each piece of specific inside information. Each section should list all persons having access to the same specific inside information. This Insider List, for the persons mentioned under par. 1 art. 18 Regulation (EU) 596/2014, shall be drawn up in accordance with Template 1 of Annex I of Implementing Regulation (EU) 2022/1210.

To avoid multiple entries in respect of the personal details of same individuals in different sections of the Insider Lists, it is possible to list those personal details in a separate section in the Insider List, referred to as the permanent insiders section. This section is of a different nature to the rest of sections of the Insider List, as it is not created upon the existence of a specific piece of inside information and should only include those persons who, due to the nature of their function or position, have access at all times to all inside information within the entity. The permanent insiders section, for the persons mentioned under par. 1 art. 18 Regulation (EU) 596/2014, shall be drawn up in accordance with Template 2 of Annex I of Implementing Regulation (EU) 2022/1210.

Regarding the issuers whose financial instruments are admitted to trading on an SME growth market (SME growth market issuers) their obligation in relation to the Insider List stems from par. 6 art. 18 Regulation (EU) 596/2014 and the respective Insider Lists are drawn up in accordance with the Template of Annex II, as well as the Templates I and II of Annex III of Implementing Regulation (EU) 2022/1210, which represent a lighter administrative burden compared to those ones required for the persons mentioned under par. 1 art. 18 Regulation (EU) 596/2014.

The abovementioned Insider Lists shall be drawn up in electronic format and shall be kept updated at all times without delay. The Insider Lists shall be submitted to the Hellenic Capital Market Commission in electronic format as soon as possible upon its request in the following email address InsiderList@cmc.gov.gr.

[TEMPLATES OF INSIDER LIST](#)