

# 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) 2016/347 of 10 March 2016, entered in force in July 3, 2016,

- 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 person acting on their behalf or on their account are required 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.

Since multiple pieces of inside information can exist within an entity at the same time, insider lists should precisely identify the specific pieces of inside information to which persons working for issuers, emission allowance market participants, auction platforms, auctioneers and auction monitor have had access to (whether it is, inter alia, a deal, a project, a corporate or a financial event, 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 inside information. Each section should list all persons having access to the same specific piece of inside information. The insider list shall be drawn up in accordance with TEMPLATE 1 of ANNEX I of IMPLEMENTING REGULATION (EU) 2016/347.

To avoid multiple entries in respect of the same individuals in different sections of the insider lists, the issuers, emission allowance market participants, auction platforms, auctioneers and auction monitor, or the persons acting on their behalf or on their account, may decide to draw up and keep up to date a supplementary section of the insider list, referred to as the permanent insiders section, which 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. In such a case, the permanent insiders section 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 issuer, the emission allowance market participant, the auction platform, the auctioneer or the auction monitor. Where the insider list contains the supplementary section, it shall be drawn up in accordance with TEMPLATE 2 of Annex I of IMPLEMENTING REGULATION (EU) 2016/347.

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](mailto:InsiderList@cmc.gov.gr)

#### TEMPLATES OF INSIDER LIST