



HELLENIC REPUBLIC
CAPITAL MARKET COMMISSION

Athens, January 17, 2023

ANNOUNCEMENT

Letter from the Hellenic Capital Market Commission to issuers of financial instruments ("Issuers") regarding the list of persons who have access to inside information ("Insider List").

In the context of prudential supervision, the Hellenic Capital Market Commission, taking into account the number of corporate or financial events occurring in the Greek market which could constitute inside information (as defined in Article 7 of Regulation (EU) 596/2014), as well as changes in legislation at European level, has sent a letter to the Issuers (the "Letter"). The Letter draws their attention to the compliance with the obligations of Article 18 of Regulation (EU) 596/2014 and the provisions of Commission Implementing Regulation (EU) 2022/1210 of 13 July 2022 (which repealed and replaced the previous Commission Implementing Regulation (EU) 2016/347) and highlights key points for the proper drawing up and updating of the Insider List in accordance with the templates provided.

The prohibition of insider dealing and unlawful disclosure of inside information (in accordance with Article 14 of Regulation (EU) 596/2014) aims at the proper and transparent functioning of the capital market and to this end, particular emphasis should be given by the Issuers to the precautionary measures included in the disclosure requirements of Regulation (EU) 596/2014 (chapter 3), as already pointed out by the Hellenic Capital Market Commission since last July (Announcements on 25 and 28 July 2022) to Issuers relating to their compliance with Articles 7 and 17 of Regulation (EU) 596/2014, regarding the public disclosure of inside information and the delayed disclosure of inside information. The Insider List provided for in Article 18 of Regulation (EU) 596/2014 is an equally indispensable tool both for Issuers to control the flow of inside information and the management of confidentiality obligations and for competent authorities when investigating possible market abuse.

For the full text of the Letter, the relevant instructions and the prescribed templates of the Insider List, please follow the link: http://www.hcmc.gr/en_US/web/portal/gnostopoieseis-kanonismou-ee-arith.-596/2014-mar-