



## THESSALONIKI PORT AUTHORITY SA

### **Policy on the Protection of Confidential Information**

Members of the Board of Directors and certain other management or other company executives have access to internal/privileged information that offers them a significant advantage over any other interested party for the acquisition or sale of company stock. These persons must avoid utilizing this advantage for personal gain, and also imparting the privileged information they possess to any third party. The term “confidential information” refers to any exclusive information that is included in documents, reports, verbal or written recommendations, or any other information related to discussions that take place in Board of Directors’ meetings or in the meetings of its committees.

Board members must be informed about their legal obligations regarding privileged information and must give notice promptly and appropriately about any transaction they make on company stock. The Financial, Customer Service and Corporate Announcements Department regularly informs the above persons about their specific obligations and ensures that all Shareholders and all interested investors receive all information that may affect their decision to make any transaction on company stock at the same time.

Any information about the company that is not known to the public, is confidential or exclusive, may be used by Board members only in relation to their role as Directors of the company and may not be used, directly or indirectly, for any other purpose.

The members of the Board of Directors must not:

- Reveal confidential information outside the company or share confidential information with any third party or person (including family, relatives, or professional or social relationships), unless they have first obtained the company’s written authorization.
- Confirm or deny statements pertaining to the company, either directly or by electronic means, if this would result in the disclosure of confidential information.
- Represent another person who has interests at odds with the company’s goals.
- Reveal confidential information to any person, other than those required pursuant to current legislation.

Confidential information must not be used in any way that would be damaging to the company.

The members of the Board of Directors acknowledge that any violation of this policy could be damaging to THPA SA and to the operation of the Board of Directors. Consequently, any Board member who violates this policy shall be suspended from their capacity as member of the Board of Directors of THPA SA.

It is self-evident that compliance with the Policy on the Protection of Confidential Information does not restrict the Board members' right to resort to the competent Greek State authorities when they ascertain actions or omissions that are detrimental to the company's interests, the public interest, or damaging to the community.