



THESSALONIKI PORT AUTHORITY SA

Conflict of Interest Policy

This Policy includes the principles adopted by THPA SA in order to fulfill its obligation to adopt and implement effective procedures for the management and monitoring of instances of conflict of interest.

The purpose of this Policy is to provide specific directions and guidance to the members of the Board of Directors on how conflicts of interest are defined, how they can be identified and which procedures must be adopted when such cases occur. In particular, the Conflict of Interests Policy aims to:

- Identify cases where Board members' conflicts of interest may arise.
- Determine the necessary procedures and control mechanisms for the timely management of such conflicts.
- Propose methods to handle and minimize the impact of conflicts of interest.

Conflict of interest definition

A conflict of interest is defined as a situation where a Board member has private interests which could influence in an illicit or unwarranted way the exercise of his official duties and obligations.

Examples of conflict of interest situations

Specifically, a conflict of interest can be defined as a situation in which a member of the Board of Directors of THPA SA finds himself/ herself in one of the following situations:

- It is possible to obtain financial profit or avoid financial loss at the expense of a customer;
- s/he has a financial or other incentive to favor the interests of another customer or group of customers, to the detriment of the interests of a customer;
- s/he exercises the same professional activity as a customer.

Identification, prevention and management of conflict of interest

Thessaloniki Port Authority SA has adopted a series of control mechanisms and measures to identify, manage, and prevent conflict of interest cases. Conflict of interest cases may be identified within the framework of ordinary or extraordinary internal audits carried out by THPA SA, or through a report by a company employee or executive.

Every member of the Board of Directors and every third party to whom some of the Board's competences have been assigned is obligated to disclose in a timely manner to the other Board members any personal interests that may ensue from company transactions that come under their responsibilities, and any other conflict between their personal interests and those of the company or any undertaking related to it pursuant to the International Accounting Standard 24, which ensues in the exercise of their duties.

Furthermore, members of the Board of Directors and every third party to whom some of the Board's competences have been assigned are prohibited from pursuing personal interests that go against the company's interests. The company has also adopted a policy for the protection of confidential information, based on which there is a classification of information and access to it is controlled.

The company has compiled and maintains a list of members that may cause a conflict of interest and undermine the company's interests. This list is updated systematically in order to incorporate any change that may occur.

The company also implements procedures to control and impede the dissemination of confidential or important information that pertains to customers or financial instruments and is not available to the public at large, and has notified the members of the Board of Directors.

This policy is reviewed annually or more frequently, if necessary, in order to incorporate any changes that may affect the management of conflicts of interest.

The Head of the Internal Audit Unit monitors Board members' observance of this policy and assesses their compliance with this policy, at least annually, and submits a relevant report to the company's Board of Directors with recommendations for the adoption of additional measures or the amendment of this policy.