

ATTICA BANK INTERNAL REGULATION

SUMMARY

Pursuant to the applicable legal framework, in particular, the provisions of Law 4706/2020 on the Corporate Governance of Societes Anonymes, Attica Bank has drawn up its Internal Regulation that was approved by the Board of Directors of 06/07/2021.

Attica Bank Internal Regulation sets out the principles for the operation and the guidelines for the Bank's governance, implementing the basic principles of corporate governance.

The Internal Regulation includes, inter alia:

- The organizational structure, the scope of work of each department, of the BoD Committees and the main Committees of the Bank.
- The main characteristics of the Bank's Internal Audit System (IAS).
- The recruitment process of senior executives and the evaluation of the performance thereof.
- The compliance procedure regarding persons who perform management duties, as these are specified under point 25, par. 1, article 3 of the Regulation (EU) 596/2014, and the persons who are closely related to them, pursuant to the definition of par. 14, article 2 herein, including the obligations arising from the provisions of article 19 of Regulation (EU) 596/2014.
- The notification process regarding any relationship of dependency, pursuant to article 9, Law 4706/2020, between the independent non-executive members of the Board of Directors and the persons who are closely related to them.
- The compliance procedure to obligations arising from articles 99 to 101, Law 4548/2018 concerning transactions with related parties.
- The policies and procedures for the prevention and dealing with conflict of interest.
- The compliance policies and procedures of the Bank with the legislative and regulatory provisions governing the Bank's organization, operation and activities.
- The procedure set out by the Bank as regards handling of privileged information and the correct information of the public, pursuant to the provisions of Regulation (EU) 596/2014.
- The policy and the procedure for the periodical evaluation of the Internal Audit System.
- The training policy of the members of the Board of Directors, the management executives and other executives of the Bank.
- The Bank's Sustainable Development Policy.
- Regulation (EU) 2016/679 and the relevant provisions of the applicable Greek legislation on the protection of personal data.

In particular:

Article 6 of Attica Bank Internal Regulation includes:

- The provisions of Law 4548/2018, in conjunction with Law 4706/2020, and of the Bank's Articles of Association regarding the procedures and rules of convening, participation and decision making by the Bank's General Meeting.

- The stipulations regarding the BoD, pursuant to the Bank's Articles of Association and the BoD's Internal Regulation, as well as regarding the BoD Committees.
- The description of Attica Bank's Organizational Structure regarding the competencies of the main Executive and Administrative Committees and the other Organizational Departments thereof.
- The Internal Audit System and the preventive or repressive audit mechanisms included therein regarding the Bank's safe and efficient operation.
- The competencies of the Compliance and Corporate Governance Department for the purposes of Attica Bank's compliance with the applicable regulatory framework and the prevention of regulatory risk. The compliance procedures regarding the persons in the Bank who perform managerial duties and the persons closely related to them, pursuant to the provisions of articles 16 and 19 of Regulation 596/2014, as well as the notification process regarding any relationship of dependency between the independent members of the Board of Directors or between the non-executive members of the Board of Directors and persons closely related to them. The procedures regarding the prevention and dealing with conflict of interest of the Bank and the measures taken to this end.
- The recruitment process of senior executives, the evaluation of the performance thereof, the remuneration framework and the plan for the Training and Professional Development of the members of the Board of Directors.

Article 7 of Attica Bank Internal Regulation describes:

- The compliance policies and procedures of the Bank with the regulatory framework governing the Bank's organization and operation.
- The methods of informing Transacting parties for transparency purposes.
- The methods of investigating and handling clients' complaints.
- The procedures regarding the observation of special banking secrecy and professional secrecy.
- The approved management system regarding corporate information security.
- The measures taken by the Bank for the protection of natural persons regarding the collection and processing of their private data.

Lastly, as stipulated in **article 8** of the Internal Regulation, acknowledging the importance and impact of the implementation of responsible business practices on society, Attica Bank implements a Sustainable Development Policy that constitutes a crucial part of its business strategy.

It is noted that Attica Bank Internal Regulation does not mention in full detail all principles and obligations applicable to the Bank under the legislative and regulatory provisions in force, but the main codification thereof.

Attica Bank Internal Regulation is supplementary to the provisions of the Bank's Articles of Association that constitutes the Bank's prevailing regulation.

The Internal Regulation and any modification thereof shall be approved by the Bank's Board of Directors. Following its approval by the BoD, a summary of the Regulation shall be posted on the Bank's website, pursuant to the Law.