



SUMMARY

ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING (AML/CTF) POLICY

1. PURPOSE

The purpose is to prevent PPC from being used as a means for money laundering and terrorist financing.

2. LEGAL BASIS

Law 4557/2018, as amended by L. 4734/2020. For the application of the provisions of this policy, the definitions set forth in L. 4557/2018, as amended by L. 4734/2020, are taken into consideration.

3. SCOPE

The policy applies to transactions carried out in the following cases:

- Occasional transaction whose value exceeds the threshold of ten thousand (10,000) euros in cash, or fifteen thousand (15,000) euros whether in cash or not and regardless of whether it is carried out in a single operation or in several operations that appear to be linked.
- Wholesale transactions or conclusion of futures contract/option or exchange contract, provided that the transaction amounts to at least ten thousand (10,000) euros regardless of whether it is carried out in a single operation or in several operations that appear to be linked.

The policy does not apply in principle to the retail transactions of the company, since these transactions do not concern high-value products, serve basic and permanent needs of critical importance, and are carried out in cash only for amounts up to 300 euros.



4. THE ROLE OF COMPETENT UNITS OF THE COMPANY (UNITS THAT BELONG TO THE ENERGY MANAGEMENT & TRADING DIVISION AND CARRY OUT TRANSACTIONS THAT FALL WITHIN THE SCOPE OF THE CURRENT POLICY)

CLASSIFICATION OF CUSTOMERS - DUE DILIGENCE MEASURES

The Company, through its competent Units which carry out transactions which fall within the scope of the current policy (primarily through the Energy Management & Trading Division), classifies its customers (to the extent that they are subject to the scope of this paragraph) based on risk assessment and transaction behavior, into the following risk categories:

- Low risk
- Standard risk
- High risk

The degree of risk depends at least on:

- the category of customers/ parties involved in a transaction
- the purpose and the intended nature of the business relationship with the customer/ party involved in a transaction
- geographic factors (place of residence of customer, source of funds, etc).

Based on the categories of customer/party involved in the transactions and the degree of risk, the following measures are taken by the Company:

- standard due diligence
- enhanced due diligence
- simplified due diligence



The standard due diligence measures shall apply to all Company's counterparties, except for those to whom the simplified or enhanced due diligence measures apply, are the following: a) Verification of the identification data of customer / beneficial owner (actions depend on whether the customer is a natural person or legal entity. Distinction as to whether it is a company with unregistered shares or a company whose beneficial owner is another company in Greece or a foreign one) b) Careful examination of any transaction or activity which, by its nature, may be related to money laundering or terrorist financing, such as complex or unusually large transactions carried out with no apparent financial or clearly lawful purpose, c) Ongoing updating / filing of updated documents, information and data.

The simplified due diligence measures consist of the simple identification through the KYC policy and apply to: (a) companies whose securities have been admitted to trading on a regulated market in a Member State of the European Union; b) to national public authorities or Public Legal Entities c) to customers who are residents of lower risk areas.

The enhanced due diligence measures consist of all the standard diligence measures, as well as some additional measures such as daily transaction monitoring, continuous updating of data, cooperation with the authorities requesting additional tax and other data that apply to:

- PEP (politically exposed persons), PEP's relatives or close associates, offshore companies, special purpose companies, public limited companies (not listed on a regulated market), non-profit bodies of persons and non-juristic arrangements or entities managing funds or other assets.
- high-risk transactions, i.e. transactions carried out by customers domiciled in higher risk countries. Such countries are considered to be the following: a) countries in which, apart from the relevant acts of the European Commission, the lack of effective systems for combating money laundering and terrorist financing has been ascertained according to reliable sources; (b) countries where sanctions, trade embargoes or similar restrictive measures have been imposed by the European Union or the United Nations.

5. APPLICATION AND CONTROL

Responsible for the application of the above mentioned (classification and application of due diligence measures) are the competent Units of the Company (1st level of



responsibility) which carry out transactions that fall within the scope of the current policy (and mainly the Energy Management & Trading Division). These transactions shall be readjusted in compliance with the applicable legislation, based on the nature of the transactions and shall be approved by the competent Chief Officer.

In order to investigate, identify and classify the aforementioned customers/ counterparties, the KYC forms, statements and procedures attached to the policy annexes (Appendix 1) are being used, and they shall be updated pursuant to the applicable legislation by the Chief Legal Affairs & Corporate Governance Officer in collaboration with the competent Chief Officer.

6. THE ROLE OF THE COMPLIANCE OFFICER RESPONSIBLE FOR THE AML/CTF POLICY (ENERGY TRANSACTIONS COMPLIANCE OFFICER)

The person entrusted with the monitoring of the compliance with this policy is in principle the "AML Compliance Officer" who is appointed by decision of the Chief Executive Officer. His duties include at least:

- receipt and evaluation of relevant reasoned reports by the competent Units of the company,
- supervision of compliance of the competent units of the company with the present policy (2nd level of responsibility),
- investigation of suspicious transactions and, in case there are facts that constitute evidence of ML or TF, reporting to the Anti-Money Laundering, Counter-Terrorist Financing and Source of Funds Investigation Authority,
- cooperation with the Anti-Money Laundering, Counter-Terrorist Financing and Source of Funds Investigation Authority, responding to questions and clarifications required.
- preparation of an annual report to the Board of Directors of the company.



7. REPORTS TO THE ANTI-MONEY LAUNDERING, COUNTER-TERRORIST FINANCING AND SOURCE OF FUNDS INVESTIGATION AUTHORITY

The Company, through the "AML Compliance Officer " shall be obliged a) to notify the Authority, when it comes to its knowledge or has serious indications or suspicions that sums of money, regardless of the amount, constitute proceeds of criminal activity or are related to terrorist financing, b) to provide without delay the Authority and other public authorities responsible for combating money laundering or terrorist financing with all required information and data, upon their request. When submitting the reports, the confidentiality of the information, as well as the protection of both the Compliance Officer and all persons reporting the suspicious incidents shall be ensured.

8. COMPANY OBLIGATIONS - CONTROL MECHANISM

The Company is obliged for a period of five (5) years from the end of the business relationship with the customer or after the date of the occasional transaction, to retain a record, hard copy or electronic, containing documents and information to be made available to the Authority, the competent or other public authorities, for the purpose of preventing, identifying and investigating any incidents related to money laundering and terrorist financing.

The Company is obliged to ensure the ongoing training and education of the competent employees in order to be able to detect any suspicious activities which may be related to money laundering or terrorist financing and take the appropriate actions. To this end, the "AML Compliance Officer" in collaboration with the Human Resources and Organization Division of the Company (Recruitment, Development & Training Department), prepares, on an annual basis, a personnel training program. The training may be carried out by certified training bodies, by professionals or by the AML Compliance Officer within the premises of the Company and a relevant record is kept.

The Internal Audit Director oversees the observance and implementation of the current policy by the Company and its competent bodies of persons and draws up an annual report to the Board of Directors.



9. THE ROLE OF THE RISK MANAGEMENT DEPARTMENT

The Director of the Risk Management Department in collaboration with the AML Compliance Officer prepares a risk assessment report, in which possible transaction "scenarios" that fall within the scope of this policy, are assessed, as well as "areas" of transactions in which "suspicious transactions" are more likely to occur.

10. IMPLEMENTATION OF THE POLICY WITHIN PPC GROUP

The policy is adopted and implemented by all subsidiaries of PPC Group that conduct transactions which fall within its scope, regardless of whether they have their seat in any other EU Member States or in third countries, and without prejudice to more specific regulations in these countries or that the applicable provisions in these countries are less stringent than those of the present policy.