

BUSINESS CONTINUITY MANAGEMENT POLICY

Business Continuity Management (BCM) of the Athens Exchange Group is a holistic management process that identifies potential threats to the Group and each company individually, as well as the consequences that if realized could cause losses or problems to the business/ operational activities of the Group's companies. In addition, BCM provides the framework for building a resilient organization to respond effectively to the aforementioned situations.

PURPOSE AND PRINCIPLES

The key objectives of the Group's BCM are:

- Safeguarding the safety of staff, partners and customers,
- Safeguarding corporate image and reputation,
- Safeguarding the interests of the main stakeholders ,
- Protecting its value-adding activities and ability to continuously provide its Services and Products,
- Compliance with applicable legal, regulatory and statutory requirements.

SCOPE

The Group's Business Continuity Management covers:

- All Products and Services provided by the Group,
- All activities, processes, technologies, assets (tangible or intangible) and resources owned and/or used by the Group (including relationships with third parties) to provide its products and services.

STANDARDS, LAWS AND REGULATIONS

The Group has designed and implemented the BCM, by taking into consideration:

- ISO22301:2019 Standard (Societal security – Business Continuity Management Systems – requirements),
- The relevant laws regarding of establishing and operating the Group's companies,
- The regulations as issued by the competent supervisory authorities (e.g., the Hellenic Capital Market Commission) in the markets where the Group's companies operate,
- The Risk Management Strategies of the Group,

- The commitments of the Group on business continuity issues towards the interested parties (e.g. terms in private agreements of cooperation, representation, provision and sale of services etc.).

LIFE CYCLE OF THE BCM

The maintenance of the Business Continuity Lifecycle on an annual basis is the responsibility of the Group's Head Business Continuity Coordinator. The Lifecycle includes indicatively the following:

- Business Impact Analysis,
- Risk Analysis and Risk Management,
- BC Strategy,
- Incident and Crisis Management Plans,
- Tests and Exercises,
- Training and awareness plans,
- Control and Compliance,
- Business Continuity Management System Review.

KEY SUPPLIERS, BUSINESS PARTNERS AND OTHER THIRD PARTIES

As part of the annual process of Business Impact Analysis and Risk Management, suppliers and other third parties are assessed for BCM readiness in terms of recovery capabilities in the event of adverse events occur, ensuring that the Services and Products they provide to the Group will continue in any such event. The key suppliers are indicated based on a relevant assessment procedure.

Contractual obligations with third parties, related to the Group's business continuity, are monitored and managed by rules set in the context of Risk Management.