

**INTERNAL REGULATION**  
**LAMDA Flisvos Marina SA**

1st Edition (22/05/2026)

## TABLE OF CONTENTS

<b>1. INTRO .....</b>	<b>3</b>
<b>2. OBJECT.....</b>	<b>3</b>
<b>3. ORGANIZATIONAL STRUCTURE OF THE COMPANY .....</b>	<b>5</b>
<b>3.1. GENERAL MEETING.....</b>	<b>5</b>
<b>3.2. BOARD OF DIRECTORS .....</b>	<b>5</b>
<b>3.3. DEPARTMENTS / ADVISORS &amp; CONSULTANTS.....</b>	<b>6</b>
<b>3.4. OTHER SERVICES .....</b>	<b>7</b>
<b>ANNEX – ORGANIZATIONAL CHART .....</b>	<b>9</b>

## 1. INTRO

This Internal Regulation (hereinafter, the “Regulation”) of the company “LAMDA Flisvos Marina S.A.” (hereinafter, the “Company”) has been drafted in accordance with the regulatory decisions of the Hellenic Capital Market Commission and Law 4706/2020 on the corporate governance of sociétés anonymes whose shares are listed on Euronext Athens, as the Company constitutes a significant subsidiary of the listed company LAMDA DEVELOPMENT S.A. (hereinafter, “LAMDA”). The current version of this Regulation shall enter into force upon approval of the Board of Directors of the Company (the BoD) during the meeting dated 22/05/2026.

This Regulation is based on the organizational structure of the Company, corresponds to its size and scope, and includes binding provisions regarding the powers and responsibilities of the governing bodies and senior management of the Company.

The Purpose of the Regulation is to regulate the organization and operation of the Company in order to ensure:

- Business Integrity;
- Transparency of business;
- Supervision of the Management and in particular the decision-making process;
- Compliance with applicable legislation, as the Company constitutes a significant subsidiary, within the meaning of Law 4706/2020, of a listed company.

The heads of the respective Departments cooperate with the competent executives responsible for other matters, as further described below, and report directly to the Company’s Chief Executive Officer, who currently also performs the duties of General Management.

This Regulation shall be read in conjunction with the provisions of the Company's Articles of Association and shall be communicated to the Company’s employees, who shall comply with it.

Responsibility for revising the Internal Regulation falls within the remit of the Human Resources Department of LAMDA MARINAS INVESTMENTS S.M.S.A. (“LMI”) and the Legal Counsel of LMI.

## 2. OBJECT

In accordance with its Articles of Association, the corporate object of the Company is the development and utilization of the land and sea zones of the Flisvos Tourist Port (hereinafter, the “**Marina**”), including the execution of specialized port works, infrastructure and facilities upgrade projects within the marine and land areas, as well as development and utilization projects concerning the land zone, and the operation thereof.

More specifically, and without limitation, the corporate object of the Company includes:

- The development, construction, erection, refurbishment, redevelopment, operation, maintenance, management and, in general, utilization, within the Marina area, of:

- ports, marinas and all types of marine facilities, whether floating or fixed, together with their permanent or temporary extensions;
  - buildings, temporary structures and, in general, building facilities of every kind;
  - shopping malls;
  - hotel and tourism units or complexes;
  - retail outlets and entertainment facilities in general (such as entertainment venues, bars, cafés, restaurants, playgrounds, amusement park facilities, cinemas, amphitheatres, indoor or outdoor event venues, theatres, etc.);
  - halls and multi-purpose spaces (such as conference and exhibition venues, artistic or cultural event spaces, museum exhibitions, aquariums, planetariums, etc.);
  - sports facilities of any kind;
  - food production facilities;
  - parking and car service facilities;
  - supply and collection stations associated with the use of the above facilities (e.g., fuel supply stations, wastewater collection facilities, etc.);
  - heliports and related facilities.
- The provision of services of every kind to users, customers and visitors of the Marina's marine and land-based facilities, as well as to any persons passing through or making use of such facilities. Such services include, indicatively and without limitation, the following:
  - The performance of mechanical, engineering, machining or other works/processes for the construction, maintenance, repair, refurbishment and any other type of work relating to recreational vessels, commercial vessels, special-purpose vessels, platforms, mechanical equipment and other floating means, whether berthed within the Marina or otherwise.
  - The manufacture, maintenance and repair of vessel components, such as sails, awnings and similar items.
  - Vessel supply services (fuel, food, water, etc.).
  - Preparation of vessels for departure and washing and cleaning services upon their return.
  - The leasing and/or operation of sports facilities of every kind and the organization of educational programs for the learning, promotion and development of sports, artistic and other activities (e.g., sailing schools, etc.).
  - The provision of services of any nature (e.g., hospitality, catering, leisure, beauty, personal care and wellness, thalassotherapy, etc.).
  - The operation of a club for Marina users and visitors.
- The import and trade of any goods, materials and commodities, products, tools or machinery pertaining to the construction, equipment and operation of the above, as well as the representation of Greek or foreign companies operating in the production or trading of such items;
- The organization of events for the commercial exploitation, promotion and showcasing of the above properties, facilities or activities (e.g., exhibitions, commercial and cultural events, concerts and other events held within the Marina premises).

- Any activity relevant to the above;

### **3. ORGANIZATIONAL STRUCTURE OF THE COMPANY**

The Company is divided organizationally in Departments, with a precise and specific object. The scope and core responsibilities of each Department are adjusted in accordance with the prevailing needs of the Company.

The organizational structure is determined on the basis of recommendations submitted by the competent Heads of Department to the Company's Chief Executive Officer, who currently also performs the duties of General Management. The employees shall have appropriate and adequate responsibilities to carry out the tasks of the organizational position assigned to them.

The organization of the Company, as reflected in its currently valid organizational chart, is structured in line with its fundamental purpose.

#### **3.1. GENERAL MEETING**

The General Meeting is the supreme governing body of the Company and represents the totality of the shareholders. The lawful resolutions of the General Meeting, duly convened and constituted, are binding upon all shareholders, including absent or dissenting shareholders. The result of the voting is announced by the chair of the General Meeting as soon as it is obtained.

The Company assists and provides for both the participation of the shareholders in the general meetings and for the material exercise of their rights to the extent possible. For the maximum and fully informed participation of shareholders in the General Meeting, the Company establishes mechanisms for the timely publication of the invitation to the General Meeting, which must at a minimum specify the date, venue and time of the meeting, the shareholders entitled to participate, the proposed agenda, as well as an accurate description of the procedures for shareholders' participation and voting.

#### **3.2. BOARD OF DIRECTORS**

The BoD is the competent body responsible for decisions on all matters relating to the representation, management, administration, and, in general, the pursuit and realization of the Company's object. In particular, the BoD:

- May delegate the powers of management and representation of the Company to one or more persons, whether Members or not, simultaneously determining the scope of such delegation, as well as their right to further delegate the exercise of the powers so assigned, or part thereof, to other Members of the BoD or third parties. Such delegation may be made generally for an indefinite or fixed period of time, or specifically for certain acts.
- Has the authority to decide on the issuance of bond loans, except for those for which the General Meeting is competent pursuant to Articles 71 and 72 of Law 4548/2018. As regards convertible bonds, the Board may decide on their issue following authorization of the General Meeting, in accordance with article 24, of Law 4548/2018.

- The minority shareholder Hellenic Public Properties Co. (HPPC), a company whose sole shareholder is the Hellenic Corporation of Assets and Participations S.A. (“Growthfund”), has the right to appoint members to the Company’s Board of Directors, *pro rata* to its shareholding interest and up to one-third (1/3) of the total number of Board members. Such right is provided for and governed under Article 12 of the Company’s Articles of Association and in accordance with the provisions of Article 79 of Law 4548/2018.

### **3.3. DEPARTMENTS / ADVISORS & CONSULTANTS**

#### **3.3.1 General Management**

General Management bears overall responsibility for the administration, organization and supervision of the Marina. It coordinates all departments, implements the decisions of Management and the Board of Directors, ensures the smooth, safe and efficient operation of the Marina facilities, and represents the Company before third parties and competent authorities. General Management services are provided to the Company by its ultimate parent company, LAMDA Marinas Investments S.M.S.A.

#### **3.3.2 Customer Service Department (CSD)**

The Customer Service Department is responsible for the reception, information and day-to-day servicing of the Marina’s customers and visitors, as well as for coordinating with the other departments to ensure the prompt and high-quality resolution of requests. The Department is responsible for the management of lease agreements relating to the retail units within the Marina’s land zone, as well as the management of berthing agreements for vessels (both permanent and transient). In addition, the Customer Service Department, in cooperation with the Port Services Department, manages the Marina’s berthing positions with a view to their optimum utilization.

#### **3.3.3 Finance Services Department (FSD)**

The Finance Services Department is responsible for the Marina’s overall financial management, in accordance with applicable legislation and corporate procedures. It is responsible for accounting monitoring, invoicing, collections and payments, contract monitoring, budgeting and financial reporting to Management.

#### **3.3.4 Technical Support & Maintenance Department (TSMD)**

The Technical Support & Maintenance Department ensures the uninterrupted operation and technical adequacy of the Marina’s building, electromechanical and other facilities. The Department is responsible for the electrical connection and disconnection of vessels, as well as for the monitoring and recording of consumption. It is also responsible for preventive and corrective maintenance, supervision of technical works, coordination of external contractors and the continuous upgrading of infrastructure.

#### **3.3.5 Port Services Department (PSD)**

The Port Services Department is responsible for safe navigation and the smooth operation of the port. It provides support during vessel arrival, berthing and departure, safeguards order and the protection of the marine area, and cooperates with the other departments to ensure high-quality customer service. Additionally,

the Port Services Department, in cooperation with the Customer Services Department, manages the Marina's berthing positions with a view to their optimum utilization.

### **3.3.6 Quality, Safety & Environment Department (QSE Department)**

The Quality, Safety & Environment Department is responsible for the development, implementation and monitoring of quality, health, safety and environmental management systems. It ensures compliance with applicable legislation and ISO standards, manages risks, inspections and certifications, and supports the sustainable development of the Marina.

### **3.3.7 Human Resources Department (HR)**

The Human Resources Department, in cooperation with the HR Department of LMI, manages all matters relating to the Company's personnel, including recruitment, employment agreements, payroll, leave, training, performance evaluation and employment relations. Furthermore, the HR Department ensures compliance with labour legislation and supports the strategic development and effective operation of the Company's human resources.

### **3.3.8 Environment Department**

The Environment Department is responsible for maintaining the cleanliness and hygiene of the Marina's land and marine areas. It manages waste collection and disposal, the maintenance of cleaning equipment and cooperates with the competent authorities and the other departments to maintain a safe and high-quality environment.

### **3.3.9 Marketing Department**

The Marketing Department, in cooperation with the Marketing Department of LMI, is responsible for the Marina's promotional strategy and commercial positioning. It designs and implements communication, promotional, branding and corporate image initiatives.

### **3.3.10. Legal Services**

The Company receives legal services from the legal counsel of its ultimate parent company, LMI, who reports to the Company's Chief Executive Officer and has a matrix reporting line to the General Counsel / Chief Legal Officer of the ultimate parent company, LAMDA DEVELOPMENT S.A. The Company also receives legal services and advice from external legal advisors whenever deemed appropriate. The coordination and supervision of external legal advisors is undertaken by LMI's legal counsel.

### **3.3.11. Technical Advisors / Project Development**

The Company receives technical services and project development services through its ultimate parent company, LMI. The Development Advisor reports to the Company's Chief Executive Officer. The Company engages external technical consultants, on a case-by-case basis, for specialized matters and designs.

## **3.4. OTHER SERVICES**

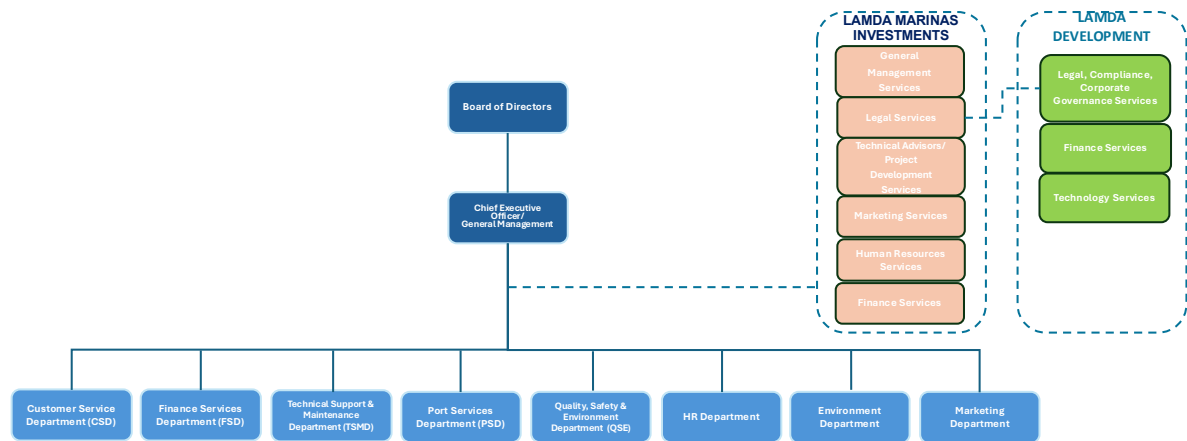
In addition to the services referred to above under Sections 3.3.1, 3.3.10 and 3.3.11, the Company receives marketing, human resources and finance services from its ultimate parent company, LMI.

Furthermore, the Company receives legal, financial and technology services from the respective Divisions of its ultimate parent company, LAMDA DEVELOPMENT S.A. The same applies to compliance and corporate governance services, which are provided by LAMDA DEVELOPMENT S.A. to the Company, whenever deemed appropriate.

The Company applies the Group's policies and procedures, as applicable and to the extent relevant to its business activities and organizational structure (such as the Sustainable Development Policy and the Related Party Transactions Procedure).



## ANNEX – ORGANIZATIONAL CHART



The services provided by LAMDA Marinas Investments S.M.S.A. to LAMDA FLISVOS MARINA S.A. are depicted in orange in the Organizational Chart.

The services provided by LAMDA DEVELOPMENT S.A. to LAMDA FLISVOS MARINA S.A. are depicted in green in the Organizational Chart.