

Report on the Audit Committee's activities for the financial year 2022

This Report on the Audit Committee's activities ("Committee") of TRASTOR REIC ("Company") refers to the description of the Committee's activities for the financial year 2022 (01/01/22 – 31/12/22) and has been conducted in accordance with the provisions of article 44 of Law 4449/2017, as applicable.

Issues related to the Structure, Operation, Role, Authority and Responsibilities of the Committee are defined in its Regulation, which is available on the Company's official website:

<https://trastor.gr/en/company/corporate-governance/board-of-directors/audit-committee/audit-committee-regulation/>

The Annual General Meeting of Shareholders of 21.04.2021, as per its decision (decision 12), resolved that the Audit Committee of the Company will be a committee of its Board of Directors, will be elected by the Board of Directors, will consist exclusively of non-executive members, will consist of three members, a Chair and two members and will have a four-year term, which may be renewed by decision of the Board of Directors.

For the financial year 2022, the composition of the Committee ensured in any case that the members have the qualifications and the required expertise for such positions, fulfilling the relevant conditions of Law 4449/2017 and Law 4706/2020, as applicable.

For the implementation of its activities, the Audit Committee convened, always in full quorum, in 2022 a total of 10 times, and additionally adopted 3 written resolutions. In addition, for the year 2023 convened a total of 4 times (until the approval of the 2022 annual financial statements), as follows:

Composition of Committee 01/01/22 – 02/03/22			
Susana Poyiadjis -Chairwoman (Independent, Non-Executive Member of the BoD)			
Lambros Papadopoulos - Member (Independent, Non-Executive Member of the BoD)			
George Tingis - Member (Non-Executive Member of the BoD)			
Composition of Committee 03/03/22			
Susana Poyiadjis -Chairwoman (Independent, Non-Executive Member of the BoD)			
Lambros Papadopoulos - Member (Independent, Non-Executive Member of the BoD)			
Ioannis Vogiatzis - Member (Μη εκτελεστικό μέλος ΔΣ)			
2022			
#	Date	Type	Members' Participation
1	21/02/2022	Meeting	3/3 =100%
2	03/03/2022	Written Resolution	3/3 =100%
3	28/03/2022	Meeting	3/3 =100%
4	28/03/2022	Written Resolution	3/3 =100%
5	12/04/2022	Meeting	3/3 =100%
6	11/05/2022	Meeting	3/3 =100%
7	16/05/2022	Meeting	3/3 =100%
8	20/06/2022	Meeting	3/3 =100%
9	26/07/2022	Meeting	3/3 =100%
10	06/09/2022	Meeting	3/3 =100%
11	26/09/2022	Meeting	3/3 =100%
12	11/10/2022	Written Resolution	3/3 =100%
13	13/12/2022	Meeting	3/3 =100%
2023			
#	Date	Type	Members' Participation
1	15/02/2023	Συνεδρίαση	3/3 =100%
2	08/03/2023	Συνεδρίαση	3/3 =100%
3	22/03/2023	Meeting	3/3 =100%
4	30/03/2023	Meeting	3/3 =100%

The areas covered and the main topics discussed at the Audit Committee meetings for the financial year 2022 are summarized below:

1. Regarding the **External Audit** and the **Financial Reporting Process** of the Company and the Group, the Committee:

- Monitored **the process and the performance of the mandatory audit** of the financial statements and, taking under consideration the content of the supplementary report of the Statutory Auditor, submitted relevant reports to the Board of Directors.
- Monitored **the process of financial information** as well as other **published relevant information** and submitted relevant recommendations/proposals to the Board of Directors to ensure its integrity.

More specifically, in relation to the above:

- Held meetings with the Statutory Auditors during the planning stage of the audit, during its execution and during the presentation stage of the supplementary audit report.
- Held meetings with the Statutory Auditors, the Statutory Valuers, and the Management during the stage of the preparation of the Financial Statements, the Investment Schedule, and the publication of other financial information.
- Examined the H1 Individual and Consolidated Financial Statements for the period from 01/01/2022 to 30/06/2022 and further recommended their approval by the Board of Directors.
- Reviewed the annual Individual and Consolidated Financial Statements for the year ended December 31, 2022 and further recommended their approval by the Board of Directors.
- Examined the structure of the unaudited Key Financial Information of the Company during Q3 of the financial year 2022, and the development in its activity, and further recommended their approval by the Board of Directors.
- Examined the Investment Schedules of 30/06/2022 and 31/12/2022 and further recommended their approval by the Board of Directors.
- Examined any reported issues on the “Audit Report” of the Statutory Auditor as well as any identified weaknesses of the ICS on its “Supplementary Report to the AC” for the year 2022 and made relevant recommendations to the Board of Directors.
 - In particular, during the audit for 2022, **no issues of essential importance emerged, nor findings that constitute material weaknesses of the Internal Control System** in relation to financial information identified by the Statutory Auditor. It is also noted that any identified non-significant weaknesses of the ICS are to be communicated by the Statutory Auditor within Q2 2023 (submission of Management Letter). Consequently, the Committee will submit its recommendations on any possible findings, while the monitoring of the agreed corrective actions’ implementation and the following progress report (Follow-Up) to the Committee, will be assigned to the Internal Audit Unit, within the framework of its responsibilities.
- Monitored the independence of the Statutory Auditor and the suitability of the provision of non-audit services.
 - Examined and confirmed its independence, as well as the provision of any non-audit services (NAS) and checked that the provision of these services does not undermine the independence of the company's statutory auditor, in accordance with Law 4449/2017 and the Regulation (EU) 537/2014
- Monitored **the independence of Statutory Valuers**.
- Directed the **evaluation process of the Statutory Auditor and Statutory Valuers** and suggested to the Board of Directors to propose their election by the General Assembly. Particularly, for the year 2022:
 - Organized an open and transparent soft tender selection process for the Statutory Audit firm and proposed the election of the Audit Company "**DELOITTE SA**" for the mandatory audit of the Company's Individual and Consolidated Financial Statements for the year.
 - Monitored and ensured the smooth switching of the Audit Firm and the Statutory Auditor.

- Was responsible for the proposal process of the companies "CBRE Values S.A." and "P. Danos & Associates S.A." as the Statutory independent valuers of par. 7 of article 22 of Law 2778/1999.
2. Regarding the Internal Control System (ICS), the operation of Internal Audit, Risk Management and Compliance functions, as well as the **Corporate Governance System**, the Committee:
- Ensured the conduct of the **external periodic evaluation** of the ICS provided by Law 4706/2020 regarding its adequacy and effectiveness by an independent Evaluator, for the period 17/07/2021 – 31/12/2022, in accordance with the provisions of Company's legislation and the internal framework. In particular:
 - Directed the selection process of the Independent Evaluator (candidate tender process, proposal process, selection and approval of the evaluation assignment). More specifically, the selection of Ms. Athina Moustaki, Certified Public Accountant with Registry Number SOEL 28871 and Partner of Grant Thornton.
 - Monitored and ensured the smooth progress of the evaluation agreed tasks, and the independence of the Evaluator. This Assessment of the Internal Control System was successfully completed in March 2023.
 - Examined and recommended the results of the assessment to the Board of Directors, which are reflected in the 2022 Corporate Governance Statement, which is an integral part of the Company's 2022 Annual Financial Report.
 - In particular, in the Conclusion of the Independent Evaluator, which is included in the final evaluation report of the adequacy and effectiveness of the ICS dated 21/03/2023, concludes that *“through the procedure conducted, and the evidence obtained regarding the evaluation of the adequacy and effectiveness of the Company's ICS, no weaknesses were identified that could be considered as material weaknesses in the Company's ICS according to the Regulatory Framework”*.
 - Monitored the **Internal Audit, Risk Management and Compliance** functions to ensure their proper functioning and independence. More specifically reviewed:
 - The Annual Internal Audit Plan (risk-based)
 - The Annual Budget of the Internal Audit Unit
 - The annual declaration of independence of the Head of Internal Audit Unit
 - The annual Risk Management Action Plan
 - The annual Risk Management Activity Report
 - The annual Compliance Action Plan
 - The annual Compliance Activity Report
 - Monitored systematically the adequacy and effectiveness of the Internal Control System and, taking into consideration the content of the **Internal Audit Unit's** audit reports, submitted relevant recommendations to the Board of Directors for its further improvement and strengthening. Particularly:
 - The quarterly activity reports of the Internal Audit Unit to the AC.
 - The Final Audit Reports, issued for completed audit projects.
 - The Follow-Up Reports on the status of corrective actions following identified weaknesses of previous audits.
 - The Internal Audit Unit's annual activity report on the Internal Audit System
 - Examined the identified weaknesses of the ICS for the year 2022 and submitted relevant recommendations for improvement to the Board of Directors.
 - In particular for 2022, **no Findings of High Importance, which would constitute material weaknesses of the ICS, identified from the audits of the IAU**. Of the 9 findings identified by the internal audits, 3 were assessed as findings of Medium Significance, for which in any case the agreed corrective actions were either implemented within 2022 or expected to be completed within H1 2023.
 - Monitored the Risk Management process and, considering the reports of the Risk Management Officer, submitted recommendations to the Board of Directors regarding the identification, assessment and monitoring of risks. Particularly:

- The Risk Management Officer's quarterly Risk Management Reports
 - The Company's Risk Register
 - Monitored the implementation of the **Company's Corporate Governance** framework and the Company's and the Group's compliance procedures with the legislative and regulatory provisions that regulate its organization, operation and activities and considering the reports of the Compliance Officer, submitted recommendations to the Board of Directors regarding the review of the Company's internal framework. Particularly:
 - The H1 overview reports regarding the Corporate Governance System, Conflict of Interests and Related Party Transactions monitoring
 - The Corporate Gifts Registry
 - The Conflict-of-Interest Registry
 - The Registry regarding Compliance with the Regulatory Framework
- 3.** Regarding its **organization and operation**, the Committee reviewed them periodically and submitted relevant reports to the Board of Directors. In particular for the year 2022 with reference to the following:
- Committee's annual plan/calendar of actions.
 - Self-evaluation of the Committee, its Chair and Members
 - Annual Activity AC Report
- 4.** Regarding monitoring **the implementation of the Company's Sustainable Development Policy - ESG**, as described in Annex VI of the Company's Internal Operating Regulations which is available on its official website https://trastor.gr/wp-content/uploads/2021/09/Internal-Regulation_june-2021_-Website_ENG.pdf the following are mentioned:
- **Brief Description of Sustainable Development Policy**
 - The Company's Sustainable Development Policy - ESG is **determined by the Board of Directors**. The Company has integrated the principles of Sustainable Development into its business activities and the way it operates, recognizing that **these principles are a necessary condition for its long-term development**.
 - Trastor, as an Investment Company, recognizes the responsibility to consider environmental, social and governance related factors in investment management. The consideration for the **health and safety** of the employees, the respect and **protection of the environment**, the comprehensive **coverage of the needs of the employees** and the congruous coexistence with the local communities, are the main issues of the Sustainable Development of the Company. Therefore, the issues of Environment, Social Responsibility and Governance are the **3 pillars** on which the Company focuses when planning its strategy and aiming for a better allocation of funds and the achievement of sustainable returns in the long term. These pillars are defined as follows:
 - **Pillar E – Environment**: Issues related to the quality and functioning of the natural environment and ecosystems.
 - **Pillar S – Social Responsibility**: Issues concerning the rights, wellness and interests of people and communities.
 - **Pillar G – Governance**: Issues related to the Corporate Governance.
 - The Company's ESG corporate strategy is planned annually in the **context of the implementation** of the Sustainable Development Policy – ESG, and the definition of the Company's specific ESG targets. The Company supports the establishment of an environmental policy, as one of the most important factors for the structure of a correct corporate behavior. It is aiming to minimize the impact on the environment, to continuously improve its environmental performance, and to promote environmental responsibility in its business culture. The Company adopts the **principle of prevention in environmental challenges**, undertaking initiatives to promote general environmental responsibility, encouraging the development and integration of environmentally friendly technologies.
 - Recognizing that a successful ESG business strategy should have broad-level endorsement, at a high level, a

relevant "**ESG Steering Group**" has been established, consisting of **members of the Board of Directors**, in order to develop, manage, monitor and further strengthen the ESG strategy.

- Reporting to the "ESG Steering Group", an "ESG Working Group" has been further established, consisting of Company executives responsible for defining the actions, coordinating, implementing, monitoring and reporting the results of the ESG strategy to the "ESG Steering Group".
- During 2022, the ESG Steering Group convened **3 meetings**, and the Board of Directors was briefly informed accordingly, while the Annual Sustainable Activity Report was submitted on 30.03.2023 for the information of the Audit Committee and the Board of Directors.

A detailed description of the Sustainable Development practices as well as the Company's 2022 ESG initiatives are described in detail in the 2022 Corporate Governance Statement, which is an integral part of the Company's 2022 Annual Financial Statements.