

**AUDIT COMMITTEE ACTIVITY REPORT FOR THE YEAR 2023**  
**OF THE COMPANY "TRASTOR REAL ESTATE INVESTMENT COMPANY"**  
**TO THE ANNUAL GENERAL MEETING OF SHAREHOLDERS OF THE COMPANY**

This Report of the Audit Committee's activities (the "**Committee**") of TRASTOR REIC (the "**Company**") refers to the description of the Committee's activities for the financial year 2023 (01.01.23 - 31.12.23) and has been conducted in accordance with the provisions of article 44 of Law 4449/2017, as applicable.

Issues related to the Composition, 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/>

## **1. Details of the composition of the Committee**

The Annual General Meeting of Shareholders of 21.04.2021, as per its decision (resolution 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 be composed exclusively of non-executive members of the Board of Directors, will consist of three members, a Chair and two members and will have a four-year term, which may be renewed by a decision of the Board of Directors.

In addition, the General Meeting of Shareholders of 17.11.2023, resolved (resolution 4) that the Audit Committee of the Company will continue to be a **committee of the Board of Directors** of the Company, to be elected by the Board of Directors, as well as to be composed exclusively of **non-executive members** of the Board of Directors, to continue to be a **three-member committee**, with its majority being **independent** and consisting of a **Chair and two members** with a term **similar to that of the Board of Directors** of the Company. Within the framework of determining the composition of the Committee by the General Meeting of Shareholders on 17.11.2023, and following the relevant same-day decision of the Audit Committee, it was decided to re-elect the same individuals as members of the Audit Committee and the same individual as its chairwoman, as follows:

### **Composition of the Committee**

- Susana Poyiadjis, Chairwoman (Independent - Non-Executive Board Member)
- Lambros Papadopoulos, Member (Independent Non-Executive Board Chairman)
- Ioannis Vogiatzis, Member (Non-Executive Board Member)

For the financial year 2023, 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, as confirmed by the evaluation of the Committee for 2023 by the Board of Directors of the Company with the assistance of an external independent consultant.

## **2. Details of the Committee's meetings**

For the implementation of its activities, the Audit Committee convened, always in full quorum, in 2023 a total of 8 times, and additionally adopted 2 written resolutions. In addition, for the year 2024 convened a total of 3 times (until the approval of the annual financial statements for the financial year 2023), as follows:

Audit Committee Meetings			
2023			
#	Date	Type	Members' Participation
1	15.02.2023	Meeting	3/3 =100%
2	08.03.2023	Meeting	3/3 =100%
3	22.03.2023	Meeting	3/3 =100%
4	30.03.2023	Meeting	3/3 =100%
5	19.06.2023	Meeting	3/3 =100%
6	20.07.2023	Meeting	3/3 =100%
7	21.09.2023	Meeting	3/3 =100%
8	10.11.2023	Written Resolution	3/3 =100%
9	17.11.2023	Written Resolution	3/3 =100%
10	01.12.2023	Meeting	3/3 =100%
2024			
#	Date	Type	Members' Participation
1	16.01.2024	Meeting	3/3 =100%
2	21.02.2024	Meeting	3/3 =100%
3	21.03.2024	Meeting	3/3 =100%

### 3. Agenda items of the Committee's meetings

The areas covered and the main topics discussed at the Audit Committee's meetings for the 2023 financial year are summarized below:

I. 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 Statutory 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 Auditor 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 Auditor, the Statutory Valuer and the Management during the stage of preparation of the Financial Statements, the Investment Schedule, and the publication of other financial information.
- Examined the half-yearly Individual and Consolidated Financial Statements for the period from 01.01.2023 to 30.06.2023 and further recommended their approval by the Board of Directors.
- Reviewed the Annual Individual and Consolidated Financial Statements for the year ended December 31, 2023 and further recommended their approval by the Board of Directors.
- Examined the Investment Schedule of June 30, 2023 and December 31, 2023 and further recommended its 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 2023 and made relevant recommendations to the Board of Directors.
  - In particular, during the audit for 2023, **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 2024 (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 Statutory Auditor's independence** 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 auditors, in accordance with Law 4449/2017 and 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 re-election by the General Assembly. Specifically for fiscal year 2023, it was responsible:
  - For the proposal process of the Audit Company "**DELOITTE CERTIFIED PUBLIC ACCOUNTANTS S.A.**" for the statutory audit of the Company's Individual and Consolidated Financial Statements for the financial year.
  - For the proposal process of the companies "**CBRE Axies S.A.**" and "**P. Danos & Associates S.A.**" as independent statutory valuers pursuant to paragraph 7 of article 22 of Law 2778/1999, for the financial year.

II. Regarding the **Internal Control System (ICS)**, the operation of Internal Audit, Risk Management and Compliance and the **Corporate Governance System**, the Committee:

- Ensured the conduct of the **external periodic evaluation of the ICS**, as provided for by Law 4706/2020, for the period 17.07.2021 - 31.12.2022, as regards its adequacy and effectiveness, by an independent evaluator, in accordance with the provisions of Company's legislation and the internal framework. This evaluation of the Internal Control System was successfully completed in March 2023. The Independent Evaluator's Conclusion 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**. For the identified non-material weaknesses in the ICS, the Committee, through the Internal Audit Unit, has intensively monitored and ensured their complete rectification by 31.12.2023.
- Monitored and evaluated the **Internal Control System** and contributed with its recommendation to the **annual internal evaluation** by the Board of Directors. In particular, for the period 01.01.2023 to 31.12.2023, taking into account the opinion of the Head of Internal Audit, acknowledged that the Internal Control System is satisfactory and its operation through the year 2023 has been adequate. In particular, as reflected in the Annual Report for the year 2023 of the Internal Audit Unit for the ICS dated 21.02.2024, the internal audits conducted in accordance with the Audit Plan for the year 2023 (a) did not reveal any findings that constitute material weaknesses in the Internal Control System (b) the Internal Audit function, Risk Management and Compliance operated adequately; and (c) the degree of management's compliance

with audit findings was Satisfactory, according to the semi-annual results of the follow-up reviews of all audit findings, namely of the Internal Audit Unit and the external auditors.

- Monitored and evaluated the implementation of the components of the Company's **Corporate Governance System** that fall under its responsibilities, taking into account the results of:
  - the annual scheduled Internal Audit on "Corporate Governance",
  - the annual internal evaluation of the Internal Control System, with the assistance of the Internal Audit Unit
  - the most recent periodic external independent evaluation of the Internal Control System, with a reference date of 31.12.2022, and
  - the reports of the Risk Officer and the Compliance Officer and in particular their reports on "Conflict of Interest" issues

assisted the Board of Directors in the periodic evaluation of the Corporate Governance System, confirming its adequacy and effectiveness, as the above **did not reveal any observations that constitute material weaknesses**.

- Reviewed the submitted **Management Letter** of the Statutory Auditor regarding identified weaknesses on the ICS for the year 2022 and found that, overall, the observations constitute non-material weaknesses and monitored the timely and effective completion of the agreed actions by the Management through the Follow-Up reports of the Internal Audit Unit.
- Systematically monitored the **Internal Audit** function to ensure the correctness of its operation and its independence and, taking into account the content of the audit reports of the Internal Audit Unit, submitted relevant recommendations to the Board of Directors for the further improvement and strengthening of the Internal Control System. More specifically:
  - The quarterly activity reports of the Internal Audit Unit
  - The Final Audit Reports
  - The Follow-Up reports on the status of corrective actions following identified weaknesses of previous audits
  - The annual activity report of the Internal Audit Unit on the Internal Control System
  - 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
  - Examined the identified weaknesses of the ICS for the year 2023 and made recommendations for improvement to the Board of Directors.
    - In particular, for 2023, the audits of the IAU did not result in any Findings of High Significance, which would constitute material weaknesses of the ICS and the recommendations were mainly related to improvements in the Company's Internal Procedures.
- Monitored the **Risk Management** process to ensure its soundness and independence and, taking into account the reports of the Risk Officer, made recommendations to the Board of Directors regarding the identification, assessment and monitoring of risks. In particular:
  - The Risk Officer's quarterly Risk Management Reports
  - The Risk Registry
  - The annual Risk Management Action Plan
  - The annual Risk Management Activity Report
    - In particular, for 2023, the recommendations focused on revising the list of risks significant to the Company included in the periodic reports of the Risk Officer to the Board of Directors (close monitoring), as well as revising the "Risk Tolerance and Appetite" thresholds in some of them.

- Monitored the **Compliance** function to ensure the effectiveness of its operation and its independence and, taking into account the reports of the Compliance Officer, confirmed for 2023 that the Company's and the Group's compliance procedures with the laws and regulations governing its organization, operation and activities are adequate and effective. More specifically:
  - The quarterly reports of the Compliance Officer regarding the following:
    - Participation of Compliance in the issuance and updating of the Company's procedures
    - Compliance audit findings (identified by the Compliance Officer or communicated to him by third parties).
    - Outsourced Activities (outsourcing)
    - Monitoring by the Compliance of the Company's timely submission of mandatory reports to the competent authorities
    - Overview of Changes to the Company's Regulatory Framework
    - Information on any sanctions imposed
  - The annual Compliance Action Plan
  - The annual Compliance Activity Report
  - The Corporate Gifts Registry
  - The Conflict-of-Interest Registry
  - The Registry regarding Compliance with the Regulatory Framework
- Reviewed the drafts of the new or in the process of being amended Policies, Regulations and other documents that constitute the internal operating framework for strengthening the Company's ICS and recommended their approval by the Board of Directors. More specifically, of the following:
  - "Internal Regulation"
  - "Comprehensive Human Resources Policy"
  - "Policy - Fundamental Principles for Human Rights"
  - "Code of Professional Conduct & Ethics"
  - "Policy on Violence and Harassment at Work"

**III. As regards its organization and operation**, the Committee has periodically reviewed and reported to the Board of Directors, in particular for the year 2023, on the following:

- Preparation of the annual plan/calendar of Committee's activities
- Self-evaluation of the Committee, its Chairwoman and Members, with the assistance of an independent external consultant
- Review of the Committee's Internal Regulation for revision, if needed
- Annual Activity Report of the Committee

**IV. With regard to monitoring the implementation of the Company's Sustainable Development Policy - ESG**, as described in Annex VI of the Company's Internal Regulation available on the Company's official website [https://trastor.gr/wp-content/uploads/2021/09/Internal-Regulation\\_gr.pdf](https://trastor.gr/wp-content/uploads/2021/09/Internal-Regulation_gr.pdf) and in accordance with the Company's Internal Sustainability Report submitted on 21.03.2024 for the purpose of informing the Committee, the following are noted:

- **Brief Description of Sustainable Development Policy**
  - The Company's Sustainable Development Policy - ESG is **determined by the Board of Directors**. The Company has incorporated the principles of Sustainable Development into its business activities and the way it operates, recognizing that **these principles are a prerequisite 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 relating to the quality and functioning of the natural environment and ecosystems.
- **Pillar S - Social Responsibility**: Issues relating to the rights, well-being and interests of people and communities.
- **Pillar G - Governance**: Matters relating to the corporate governance of the Company.

- 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 5 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's executives** responsible for defining the actions, coordinating, implementing, monitoring and reporting the results of the ESG strategy to the ESG Steering Group.
- During 2023, the ESG Steering Group convened **3 meetings**, and the Board of Directors was briefly informed accordingly, while the Annual Internal Sustainable Activity Report was submitted on 19.03.2024 for the information of the Audit Committee and the Board of Directors.

A detailed description of the Company's Sustainable Development practices and its ESG initiatives for 2023 are described in the 2023 Corporate Governance Statement, which is an integral part of the Company's 2023 Annual Financial Statements.

## THE MEMBERS OF THE AUDIT COMMITTEE

**SUSANA POYIADJIS**  
Chairwoman

**LAMBROS PAPADOPOULOS**  
Member

**IOANNIS VOGIATZIS**  
Member