



**PROCEDURE OF PUBLICATION OF SIGNIFICANT HOLDINGS ACCORDING TO THE
REGULATION OF L.3556/2007**

H. BENRUBI AND SON S.A. (the "Company"), in order to inform and facilitate its shareholders, provides hereby information regarding the obligation and the publication procedure of significant holdings, in accordance with the provisions of law 3556/2007 (the "Law"), Decision 1/434/03.07.2007 issued by the Board of Directors of the Hellenic Capital Market Commission (the "Decision") and the clarifications provided by the Guidance Circular 33/03.07.2007 issued of the Hellenic Capital Market Commission (the "Circular").

OBLIGORS – PUBLICATION OF SIGNIFICANT HOLDINGS

In accordance with article 14 paragraph 2 of the Law, there is an individual obligation of:

(a) every shareholder of the Company, who acquires or disposes shares with voting rights that have been listed on a regulated market and as a consequence the percentage of voting rights that such person holds is equal or exceeds or is below the thresholds of 5%, 10%, 15%, 20%, 25%, 1/3, 50%, and 2/3, or if the shareholder holds a percentage of voting rights higher than 10% and if this percentage changes by 3% or more than 3% of the total voting rights of the Company;

(b) every person (shareholder or not) who is entitled to acquire, dispose or exercise voting rights in the Company and as a consequence of the acquisition, disposal or exercise, the percentage of voting rights that such person holds is equal or exceeds or is below the thresholds of 5%, 10%, 15%, 20%, 25%, 1/3, 50%, and 2/3, or if the above mentioned person holds a percentage of voting rights higher than 10% and if this percentage changes by 3% or more than 3% of the total voting rights of the Company;

to notify the above events to the Company and to the Hellenic Capital Market Commission.

We would like to draw the attention of the Company's shareholders that within three (3) months from the enactment of the Law i.e. until 30.09.2007, the above mentioned obligated persons that have a significant holding in the voting rights of the Company, shareholders or not, are obliged to notify the Company about the percentage on the voting rights and on the paid up share capital of the Company that they hold, in accordance with articles 9 and 10 of the Law, unless they have already made the same notification according to the abolished p.d 51/92.

PROCEDURE AND TIME FOR SUBMITTING THE NOTIFICATION – COMPETENT AUTHORITIES

(1) The above mentioned obligors for notification, in accordance with articles 9 and 10 of the Law, must notify any significant change of their holding in the voting rights of the Company, in accordance with the above provisions simultaneously to the Company and the Hellenic Capital Market Commission as soon as possible and in any case, the latest within three (3) trading days, the first day of which being the next day after the date on which the obligor who acquired the rights:

- a) is informed of the acquisition or the disposal or the right to exercise the voting rights, or
- b) taking into account the circumstances each time, the obligor should have been informed of the acquisition or the disposal or the right to exercise the voting rights, irrespective of the date on which the actual acquisition or disposal or the right to exercise the voting rights actually took place, or
- c) is informed of an event mentioned in article 9 paragraph 3 of the Law.

In order to facilitate the counting of the trading days, the Hellenic Capital Market Commission publishes on its website (www.hcmc.gr) the trading days-calendar of regulated markets that are located or operate in Greece.

To the extent that the above information may be considered as privileged, the obligor must act with the required diligence in monitoring the orders given for the execution of the transactions and take the necessary measures, in order to be informed in due time whether they were executed or not and accordingly to proceed with their notification.

(2) The notification should include the following information:

- a) the percentage of voting rights held pursuant to the acquisition or the disposal, the calculation of which is based on the most recent publication of the Company concerning the total voting rights and share capital in accordance with article 9 paragraph 5 of the Law,
- b) the chain of the controlled companies through which the voting rights are essentially held, as the case may be,
- c) the date on which the percentage of the voting rights reached, exceeded or went below the thresholds of article 9 paragraph 1 and 4 of the Law , and
- d) the identity of the shareholder, even if such shareholder does not have the right to exercise the voting rights in accordance with article 10 of the Law, as well as the identity of the person which is entitled to exercise the voting rights on behalf of the said shareholder.

(3) The simultaneous notification to the Company and to the Hellenic Capital Market Commission is made by submitting to both of them the respective Notification Form (TR1), a model of which is being posted on the Hellenic Capital Market Commission website (www.hcmc.gr) both in English and in Greek. The Annex attached to the model, is to be filled in by the obligors with their personal details and to be submitted only to the Hellenic Capital Market Commission. When filling in the Annex, it is recommended that, in addition to what is already mentioned there, the obligor mention his/her father's name.

It is noted that the obligor is liable for the accuracy of the notification and for any mistakes or omissions in it. Furthermore, it is noted that the notification form must be submitted to the Company and to the Hellenic Capital Market Commission dully executed (signed). The notification form is dully signed when bearing the signature of the obligor or of any other person, legally authorized. In case the obligor is a legal entity, the notification form is signed by its legal representative. In any case, along with the notification form the respective authorisation documents must be also submitted to the Company and to the Hellenic Capital Market Commission. Such documents remain in force until they are revoked.

The dully signed Notification Form is submitted:

a) to the Company, at its offices, 27 Agiou Thoma Street, 151 24, Maroussi, Athens, Greece, to the attention of Investor Relations Department (telephone number: +30 210 61 56 514, during business days and hours, bearing the note «Notification of Significant Change in voting rights in accordance with the Law 3556/2007». In order to facilitate the shareholders, the notification form can be sent by fax at number: +30 210 61 99 316 or 318, with an attached cover page that will mention the details of the sender, his/her signature, a contact number and the number of the pages sent. The obligor is responsible for the successful sending/ transmission of the notification and their delivery to the competent department.

b) to the Hellenic Capital Market Commission, at its central protocol service (1, Kolokotroni Street and Stadiou Street, post code 105 62, Athens, Greece), addressed to the Department of Public Offerings and Supervision of listed companies, Section of Supervision and monitoring of Listed Companies of the Hellenic Capital Market Commission, bearing the note «Notification of Significant Change in voting rights in accordance with the Law 3556/2007». The submission can be also made by sending a fax at number: +30 210 33 77 243. In such case, the notification form must be followed by a cover page mentioning the details of the sender, his/her signature, a contact number and the number of the pages sent. The obligor is responsible for the successful sending/ transmission of the notification and their delivery to the competent protocol service.

In any case, the competent authority for supervising the notification obligations is the Hellenic Capital Market Commission.

SANCTIONS

It is noted that, according to article 26 of the Law, in case the provisions of the Law and the decisions issued upon the Law's authorization are violated, the Hellenic Capital Market Commission can either address a reproach or impose a fine up to €1,000,000. The components that are taken into account for the measurement of the fine are mentioned in the same article of the Law.

For further information, the Company's shareholders may contact the Investor Relations Department of the Company during business days and hours at telephone number: +30 210 61 56 514.