

WFC Single Disclosure Report 2018

Date submitted

26/10/2018 03:17:20

General information

1 G01Q001

Please indicate the full name of the responding institution:

PFMI: Annex A - CSD disclosure template [CSD name]

AGC: 0a

Greece- Hellenic Central Securities Depository (ATHEXCSD)

2 G01Q002

Registered address:

PFMI: n/a

AGC: 0c

110 Athinon Avenue 10442 Athens

3 G01Q003

Country of registered address:

PFMI: n/a

AGC: 0d

Greece

4 G01Q004

Official website of the respondent institution:

PFMI: Annex A - CSD disclosure template [website]

AGC: n/a

www.athexgroup.gr

5 G01Q005

The date of this disclosure is:

PFMI: Annex A - CSD disclosure template [date]

AGC: n/a

6 G01Q006

The WFC, the AGC, CPMI and IOSCO encourage respondents to make their disclosure reports publicly available. Do you agree to make your response publicly available?

PFMI: n/a

AGC: 99

Yes, my full response will be publicly available. I agree that my response can be published on the website of the WFC and on the website of the regional CSD association(s) which my CSD is a member of. [A1]

7 G01Q007
How will you be making your answers publicly available?

PFMI: n/a
AGC: 99a

Website
 Upon request
 OTHER:

8 G01Q008
This disclosure can also be found at the following web address(es):

PFMI: Annex A - CSD disclosure template [website URL]
AGC: 99b

<http://www.athexgroup.gr/web/guest/functions-depository>

9 G01Q009
First and Last Name of the contact person:

PFMI: Annex A - CSD disclosure template [contact details]
AGC: 99c

Konstantinos Iliopoulos, Corporate Actions Department

10 G01Q009A
Disclosure submission authorisation

I hereby certify that I am authorised to submit this disclosure report on behalf of my institution.

11 G01Q010
Email address of the contact person:

PFMI: Annex A - CSD disclosure template [contact details]
AGC: 99h

questionnaires@athexgroup.gr

12 G01Q011
Telephone number (please include the international country code):

PFMI: n/a
AGC: 99e

30 210 3366578

13 G01Q012

How do you prefer to be contacted?

PFMI: n/a
AGC: 99d

- Telephone
- Fax
- mail/air courier
- e-mail

14 G01Q013
Fax number

PFMI: n/a
AGC: 99f

30 210 3366475

15 G01Q014
What is the preferred street address for mailing requests?

PFMI: n/a
AGC: 99g

110 Athinon Avenue GR10442 Athens - GREECE

16 G01Q015
Please list the jurisdiction(s) in which the CSD operates:

PFMI: Annex A - CSD disclosure template [list jurisdictions]
AGC: n/a

17 G01Q016
Please list the authority(ies) regulating, supervising or overseeing the CSD:

PFMI: Annex A - CSD disclosure template [list authorities]
AGC: n/a

18 G01Q017
Executive summary (This section should summarise the key points from the disclosure framework, including a brief overview of the CSD, its participants, its legal and regulatory framework, its primary risks, and its key risk management and other relevant practices.)

PFMI: I.
AGC: n/a

19 G01Q018
Summary of major changes since the last update of the disclosure (This section should summarise the major changes to the CSD's organisation, services, design, rules, markets served and regulatory environment since its last disclosure. The CSD should note the sections in its disclosure where such changes are reflected.)

PFMI: II.
AGC: n/a

20 G01Q019

General description of the CSD and the markets it serves (This section should provide basic, concise descriptions of the services offered and functions performed by the CSD? It should also provide an overview of the markets the CSD serves and the role it fulfils within those markets. Further, the section should include basic data and performance statistics on its services and operations. A CSD should provide, for example, basic volume and value statistics by product type, average aggregate intraday exposures of the CSD to its participants, and statistics on the CSD's operational reliability.)

PFMI: III.1.
AGC: n/a

21 G01Q020

General organisation of the CSD (This section should provide an overview of the organisational and governance structure of the CSD? including a description of the CSD's governance policies, governance structure and management structure.)

PFMI: III.2
AGC: n/a

22 G01Q021

Legal and regulatory framework (This section should provide an overview of the CSD's legal and regulatory framework, including the legal and ownership structure of the CSD, the legal basis for each material aspect of the CSD's activities, and the regulatory, supervisory and oversight framework for the CSD.)

PFMI: III.3
AGC: n/a

23 G01Q022

System design and operations (This section should explain the CSD's design and operations. It should include a clear description of the typical lifecycle of the transaction process. The information should highlight how the CSD processes a transaction, including the timeline of events, the validation and checks to which a transaction is subjected, and the responsibilities of the parties involved.)

PFMI: III.4
AGC: n/a

24 G01Q023

filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

Legal Basis (PFMI Principle 1)

25 G02Q001
 Summary narrative for PFMI Principle 1. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P1
AGC: n/a

26 G02Q002
 Under what regulation or statute is the CSD established and governed?

PFMI: n/a
AGC: 7

Law 1806/1988 of 22.2.1991 (Government Gazette Issue 434/22.2.1991), article 33a and subsequent laws (such as Law 2396/1996 on the legislation of dematerialized securities and Law 3606/2007 implementing the Markets in Financial Instruments Directive) and decisions (Decision No 667/9.12.2013/HCMC on the approval of transfer of management responsibilities of Dematerialised Securities System from "Hellenic Exchanges SA Holding, Clearing, Settlement and Registry" to "Hellenic Central Securities Depository).

27 G02Q003
 Is the regulation or statute electronically available?

PFMI: n/a
AGC: 7a

Yes [Y]

28 G02Q004
 If regulation or statute is electronically available, please supply web address(es) here or upload document(s).

PFMI: n/a
AGC: 7b

<http://www.hcmc.gr/vdrv/elib/a22729525-772a-44fc-8b53-40683961da32-92668751>
<http://www.hcmc.gr/vdrv/elib/a21fbbd04-5ad3-4ac6-a417-4bdc6fc649f9-92668751> (in Greek only).

29 G02Q005
 filecount - Please supply document(s) here:

PFMI: n/a
AGC: 7c

L1806_88 .pdf (173KB)	Law 1806/1988
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1

30 G02Q006
 What are the material aspects of the CSD's activities that require a high degree of legal certainty (for

example, rights and interests in financial instruments, settlement finality, netting, interoperability, immobilisation and dematerialisation of securities, arrangements for DvP, PvP or DvD, collateral arrangements (including margin arrangements), and default procedures)?

PFMI: Q.1.1.1
AGC: n/a

31 G02Q007

What are the relevant jurisdictions for each material aspect of the CSD's activities?

PFMI: Q.1.1.2
AGC: n/a

32 G02Q008

How does the CSD ensure that its legal basis (that is, the legal framework and the CSD's rules, procedures and contracts) provides a high degree of legal certainty for each material aspect of the CSD's activities in all relevant jurisdictions? In particular, how does the CSD ensure that its legal basis supports the immobilisation or dematerialisation of securities and the transfer of securities by book entry? In addition, if the CSD has a netting arrangement, how does the CSD ensure that its legal basis supports the enforceability of that arrangement? Where settlement finality occurs in the CSD, how does the CSD ensure that its legal basis supports the finality of transactions, including those of an insolvent participant? Does the legal basis for the external settlement mechanisms the CSD uses, such as funds transfer or securities transfer systems, also support this finality?

PFMI: Q.1.1.3
AGC: n/a

33 G02Q009

How has the CSD demonstrated that its rules, procedures and contracts are clear and understandable?

PFMI: Q.1.2.1
AGC: n/a

34 G02Q010

How does the CSD ensure that its rules, procedures and contracts are consistent with relevant laws and regulations (for example, through legal opinions or analyses)? Have any inconsistencies been identified and remedied?

PFMI: Q.1.2.2
AGC: n/a

35 G02Q011

Are the CSD's rules, procedures and contracts reviewed or assessed by external authorities or entities?

PFMI: Q.1.2.2
AGC: n/a

36 G02Q012

Do the CSD's rules, procedures and contracts have to be approved before coming into effect? If so, by

whom and how?

PFMI: Q.1.2.3
AGC: n/a

37 G02Q013

How does the CSD articulate the legal basis for its activities to relevant authorities, participants and, where relevant, participants' customers?

PFMI: Q.1.3.1
AGC: n/a

38 G02Q014

How does the CSD achieve a high level of confidence that the rules, procedures and contracts related to its operations are enforceable in all relevant jurisdictions identified in PFMI Principle 1 key consideration 1 (for example, through legal opinions and analyses)?

PFMI: Q.1.4.1
AGC: n/a

39 G02Q015

How does the CSD achieve a high degree of certainty that its rules, procedures and contracts will not be voided, reversed or subject to stays? Are there any circumstances in which a CSD's actions under its rules, procedures or contracts could be voided, reversed or subject to stays? If so, what are those circumstances?

PFMI: Q.1.4.2
AGC: n/a

40 G02Q016

Has a court in any relevant jurisdiction ever held any of the CSD's relevant activities or arrangements under its rules and procedures to be unenforceable?

PFMI: Q.1.4.3
AGC: n/a

41 G02Q017

If the CSD is conducting business in multiple jurisdictions, how does the CSD identify and analyse any potential conflict-of-laws issues? When uncertainty exists regarding the enforceability of a CSD's choice of law in relevant jurisdictions, has the CSD obtained an independent legal analysis of potential conflict-of-laws issues? What potential conflict-of-laws issues has the CSD identified and analysed? How has the CSD addressed any potential conflict-of-laws issues?

PFMI: Q.1.5.1
AGC: n/a

42 G02Q018

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Governance and ownership (PFMI Principle 2)

43 G03Q001

Summary narrative for PFMI Principle 2. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P2

AGC: n/a

44 G03Q002

What type of legal entity is the institution?

PFMI: n/a

AGC: 3

- Public Company
- Private Company
- Central Bank (or part thereof)
- Stock Exchange (or part thereof)
- OTHER:

45 G03Q003

Is the institution operated as a "for profit" or a "not for profit" organization?"

PFMI: n/a

AGC: 4

For profit [A01]

46 G03Q004

Please provide the names of the owners and their ownership interest percentages.

PFMI: n/a

AGC: 5

ATHEXCSD is a 100% owned ATHEX subsidiary. Hellenic Exchanges-Athens Stock Exchange (ATHEX, former HELEX, stock symbol: EXCr.AT) is a listed company which has its shares traded on Athens Exchange. On 31 August 2018 ATHEX had approximately 10,500 shareholders. The breakdown per shareholder type is: International (i.e. non-Greek) investors 58.7%, Local retail investors 21.1%, Local inst. investors 11.6%, Local banks 5.7%, ATHEX Members 1.0%, ATHEX Management Team 0.1%, Other 1.8%. The largest shareholders (> 5%) are: Franklin Templeton and The London And Amsterdam Trust Company Ltd. More information about the Company and the Group can be found in the annual financial reports, which are published in Greek and English and are available here: <http://www.athexgroup.gr/web/guest/re-financial-statements>.

47 G03Q005

What is the date of establishment of the CSD?

PFMI: n/a

AGC: 6a

22/02/1991

48 G03Q006

What is the date that the CSD's operations began?

PFMI: n/a

AGC: 6b

22/02/1991

49 G03Q007

Are participants required to contribute capital to the CSD that would result in ownership of the CSD?

PFMI: n/a

AGC: 18

No [A02]

50 G03Q008

If yes, what fixed amount is required or what formula is used to determine the appropriate contribution level?

PFMI: n/a

AGC: 18a.

51 G03Q009

What are the CSD's objectives, and are they clearly identified?

PFMI: Q.2.1.1

AGC: n/a

52 G03Q010

How does the CSD assess its performance in meeting its objectives?

PFMI: Q.2.1.1

AGC: n/a

53 G03Q011

How do the CSD's objectives place a high priority on safety and efficiency? How do the CSD's objectives explicitly support financial stability and other relevant public interest considerations?

PFMI: Q.2.1.2

AGC: n/a

54 G03Q012

What are the governance arrangements under which the CSD's board of directors (or equivalent) and management operate? What are the lines of responsibility and accountability within the CSD? How and where are these arrangements documented?

PFMI: Q.2.2.1

AGC: n/a

55 G03Q013

For central bank-operated systems, how do governance arrangements address any possible or perceived conflicts of interest? To what extent do governance arrangements allow for a separation of the operator and oversight functions?

PFMI: Q.2.2.2

AGC: n/a

56 G03Q014

How does the CSD provide accountability to owners, participants and other relevant stakeholders?

PFMI: Q.2.2.3

AGC: n/a

57 G03Q015

How are the governance arrangements disclosed to owners, relevant authorities, participants and, at a more general level, the public?

PFMI: Q.2.2.4

AGC: n/a

58 G03Q016

What are the roles and responsibilities of the CSD's board of directors (or equivalent), and are they clearly specified? Please provide details of the structure and composition of your Board together with their industry experience and responsibilities in governing the CSD. What are the qualifications to become a board member?

PFMI: Q.2.3.1

AGC: 7d

According to Greek Company law, Board Members must have full legal capacity and not have any conflict of interests. In order to avoid such conflict of interest, the law provides for an obligation for BoD members to declare any such conflicts of interest to the Company. The function of a Board Member is incompatible to an auditor's according to law; moreover, the Statutes of the Company provide for a non-competition clause regarding the function of a Board Member. All of ATHEXCSD's BoD Members are experienced businessmen having an outstanding and thorough knowledge of the Hellenic capital market as well as of the international financial business environment. The composition of the BoD is available at <http://www.athexgroup.gr/web/guest/athexcscd>

59 G03Q017

What are the board's procedures for its functioning, including procedures to identify, address and manage member conflicts of interest? How are these procedures documented, and to whom are they disclosed? How frequently are they reviewed?

PFMI: Q.2.3.2

AGC: n/a

60 G03Q018
What are the election procedures?

PFMI: Q.2.3.2
AGC: 7e

As provided by law, the general assembly of shareholders appoints the board members. Within 20 days following the BoD Members' appointment, the Company submits the act of appointment to the Hellenic Capital Market Commission.

61 G03Q019
What is the maximum length of time a board member can serve?

PFMI: Q.2.3.2
AGC: 7f

According to the Statutes of the Company, the maximum length is 5 years from election. However, it may be extended up to the first ordinary meeting of shareholders following the end of term. Maximum length cannot exceed 6 years though. Re-eligibility is possible.

62 G03Q020
How are the voting powers distributed amongst the board members (i.e. does each board member have one vote or do certain members have additional voting power)?

PFMI: Q.2.3.2
AGC: 7g

According to the law and statutes, Board Members represent the company, administrate its property and decide on the administration of the company and the accomplishment of its goals. In addition, the Board may delegate part or all of its powers to one or more Board members, Directors or employees and even third parties, except of those requiring a collective action.

63 G03Q021
Describe the board committees that have been established to facilitate the functioning of the board. What are the roles, responsibilities and composition of such committees?

PFMI: Q.2.3.3
AGC: n/a

64 G03Q022
What are the procedures established to review the performance of the board as a whole and the performance of the individual board members? Who is responsible for regulating the board members?

PFMI: Q.2.3.4
AGC: 7h

Board members are subject to Greek Company Law and provisions of the Company's Statutes. According to these provisions, the Chairman of the Board is responsible for regulating board members. Upon nomination or change of the BoD Members, the Hellenic Capital Market Commission has the power to check the reliability and experience of the new candidate Members of the Board, as provided by article 42 paragraph 4 of law 3606. The Hellenic Capital Market Commission may not approve nominations if there are objective and verifiable reasons substantiating that such nominations may threaten the proper and prudent administration of the CSD (art. 42 par. 5 of Law 3606).

65 G03Q023

To what extent does the CSD's board have the appropriate skills and incentives to fulfil its multiple roles? How does the CSD ensure that this is the case?

PFMI: Q.2.4.1

AGC: n/a

66 G03Q024

What incentives does the CSD provide to board members so that it can attract and retain members of the board with appropriate skills? How do these incentives reflect the long-term achievement of the CSD's objectives?

PFMI: Q.2.4.2

AGC: n/a

67 G03Q025

Does the board include non-executive or independent board members?

PFMI: Q.2.4.3

AGC: n/a

68 G03Q026

If yes, how many?

PFMI: Q.2.4.3

AGC: n/a

69 G03Q027

If the board includes independent board members, how does the CSD define an independent board member? Does the CSD disclose which board member(s) it regards as independent?

PFMI: Q.2.4.4

AGC: n/a

70 G03Q028

What are the roles and responsibilities of management, and are they clearly specified?

PFMI: Q.2.5.1

AGC: n/a

71 G03Q029

How are the roles and objectives of management set and evaluated?

PFMI: Q.2.5.2

AGC: n/a

72 G03Q030

To what extent does the CSD's management have the appropriate experience, mix of skills and the integrity necessary for the operation and risk management of the CSD? How does the CSD ensure that this is the case?

PFMI: Q.2.5.3

AGC: n/a

73 G03Q031

What is the process to remove management if necessary?

PFMI: Q.2.5.4

AGC: n/a

74 G03Q032

What is the risk management framework that has been established by the board?

PFMI: Q.2.6.1

AGC: n/a

75 G03Q033

How is it documented?

PFMI: Q.2.6.1

AGC: n/a

76 G03Q034

How does this framework address the CSD's risk tolerance policy, assign responsibilities and accountability for risk decisions (such as limits on risk exposures), and address decision-making in crises and emergencies?

PFMI: Q.2.6.2

AGC: n/a

77 G03Q035

What is the process for determining, endorsing and reviewing the risk management framework?

PFMI: Q.2.6.3

AGC: n/a

78 G03Q036

What are the roles, responsibilities, authority, reporting lines and resources of the risk management and audit functions?

PFMI: Q.2.6.4

AGC: n/a

79 G03Q037

How does the board ensure that there is adequate governance surrounding the adoption and use of risk management models? How are these models and the related methodologies validated?

PFMI: Q.2.6.5

AGC: n/a

80 G03Q038

How does the CSD identify and take account of the interests of the CSD's participants and other relevant stakeholders in its decision-making in relation to its design, rules, overall strategy and major decisions?

PFMI: Q.2.7.1

AGC: n/a

81 G03Q039

How does the board consider the views of direct and indirect participants and other relevant stakeholders on these decisions, for example, are participants included on the risk management committee, on user committees such as a default management group or through a public consultation?

PFMI: Q.2.7.2

AGC: n/a

82 G03Q040

How are conflicts of interest between stakeholders and the CSD identified, and how are they addressed?

PFMI: Q.2.7.2

AGC: n/a

83 G03Q041

To what extent does the CSD disclose major decisions made by the board to relevant stakeholders and, where appropriate, the public?

PFMI: Q.2.7.3

AGC: n/a

84 G03042

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Comprehensive risk management (PFMI Principle 3)

85 G04Q001

Summary narrative for PFMI Principle 3. Please provide a summary narrative disclosure with sufficient

detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P3

AGC: n/a

86 G04Q002

What types of risk arise in or are borne by the CSD?

PFMI: Q.3.1.1

AGC: n/a

87 G04Q003

Any direct damages or losses to participants caused by the CSD as a result of force majeure events, acts of God, or political events, etc.?

PFMI: Q.3.1.1

AGC: 66x.

No [A02]

88 G04Q004

If yes, please check all of the following that apply:

PFMI: Q.3.1.1

AGC: 66y.

Financial limits are imposed on the amount of liability assumed by the CSD

The CSD assumes liability for direct losses

The CSD assumes liability for indirect or consequential losses

OTHER:

89 G04Q005

In all cases where the CSD assumes responsibility for direct or indirect or consequential losses, is the CSD's liability limited by a standard of care determination?

PFMI: Q.3.1.1

AGC: 66+

Not applicable [A03]

90 G04Q006

Please define the standard of care applied:

PFMI: Q.3.1.1

*AGC: 66**

91 G04Q007

What are the CSD's policies, procedures and controls to help identify, measure, monitor and manage the risks that arise in or are borne by the CSD?

PFMI: Q.3.1.2
AGC: n/a

92 G04Q008
What risk management systems are used by the CSD to help identify, measure, monitor and manage its range of risks?

PFMI: Q.3.1.3
AGC: n/a

93 G04Q009
How do these systems provide the capacity to aggregate exposures across the CSD and, where appropriate, other relevant parties, such as the CSD's participants and their customers?

PFMI: Q.3.1.4
AGC: n/a

94 G04Q010
What is the process for developing, approving and maintaining risk management policies, procedures and systems?

PFMI: Q.3.1.5
AGC: n/a

95 G04Q011
How does the CSD assess the effectiveness of risk management policies, procedures and systems?

PFMI: Q.3.1.6
AGC: n/a

96 G04Q012
How frequently are the risk management policies, procedures and systems reviewed and updated by the CSD? How do these reviews take into account fluctuation in risk intensity, changing environments and market practices?

PFMI: Q.3.1.7
AGC: n/a

97 G04Q013
What information does the CSD provide to its participants and, where relevant, their customers to enable them to manage and contain the risks they pose to the CSD?

PFMI: Q.3.2.1
AGC: n/a

98 G04Q014

What incentives does the CSD provide for participants and, where relevant, their customers to monitor and manage the risks they pose to the CSD?

PFMI: Q.3.2.2
AGC: n/a

99 G04Q015

How does the CSD design its policies and systems so that they are effective in allowing their participants and, where relevant, their customers to manage and contain their risks?

PFMI: Q.3.2.3
AGC: n/a

100 G04Q016

How does the CSD identify the material risks that it bears from and poses to other entities as a result of interdependencies? What material risks has the CSD identified?

PFMI: Q.3.3.1
AGC: n/a

101 G04Q017

How are these risks measured and monitored? How frequently does the CSD review these risks?

PFMI: Q.3.3.2
AGC: n/a

102 G04Q018

What risk management tools are used by the CSD to address the risks arising from interdependencies with other entities?

PFMI: Q.3.3.3
AGC: n/a

103 G04Q019

How does the CSD assess the effectiveness of these risk management tools? How does the CSD review the risk management tools it uses to address these risks? How frequently is this review conducted?

PFMI: Q.3.3.4
AGC: n/a

104 G04Q020

How does the CSD identify scenarios that may potentially prevent the CSD from providing its critical operations and services? What scenarios have been identified as a result of these processes?

PFMI: Q.3.4.1
AGC: n/a

105 G04Q021

How do these scenarios take into account both independent and related risks to which the CSD is exposed?

PFMI: Q.3.4.2

AGC: n/a

106 G04Q022

What plans does the CSD have for its recovery or orderly wind-down?

PFMI: Q.3.4.3

AGC: n/a

107 G04Q023

How do the CSD's key recovery or orderly wind-down strategies enable the CSD to continue to provide critical operations and services?

PFMI: Q.3.4.4

AGC: n/a

108 G04Q024

How are the plans for the CSD's recovery and orderly wind-down reviewed and updated? How frequently are the plans reviewed and updated?

PFMI: Q.3.4.5

AGC: n/a

109 G04Q025

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Credit risk (PFMI Principle 4)

110 G05Q001

Summary narrative for PFMI Principle 4. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P4

AGC: n/a

111 G05Q002

Does the CSD have a banking license?

PFMI: n/a
AGC: n/a

112 G05Q003
Irrespective of whether or not the CSD has a banking license, can it offer cash accounts and/or credit to its participants?

PFMI: n/a
AGC: n/a

113 G05Q004
Please explain:

PFMI: n/a
AGC: n/a

114 G05Q005
What is the CSD's framework for managing credit exposures, including current and potential future exposures, to its participants and arising from its payment, clearing and settlement processes?

PFMI: Q.4.1.1
AGC: n/a

115 G05Q006
How frequently is the framework reviewed to reflect the changing environment, market practices and new products?

PFMI: Q.4.1.2
AGC: n/a

116 G05Q007
How does the CSD identify sources of credit risk? What are the sources of credit risk that the CSD has identified?

PFMI: Q.4.2.1
AGC: n/a

117 G05Q008
How does the CSD measure and monitor credit exposures? How frequently does and how frequently can the CSD recalculate these exposures? How timely is the information?

PFMI: Q.4.2.2
AGC: n/a

118 G05Q009
What tools does the CSD use to control identified sources of credit risk (for example, offering an

RTGS or DvP settlement mechanism, limiting net debits or intraday credit, establishing concentration limits, or marking positions to market on a daily or intraday basis)? How does the CSd measure the effectiveness of these tools?

PFMI: Q.4.2.3
AGC: n/a

119 G05Q010

How does the SSS cover its current and, where they exist, potential future exposures to each participant? What is the composition of the CSD's financial resources used to cover these exposures? How accessible are these financial resources?

PFMI: Q.4.3.1
AGC: n/a

120 G05Q011

Does the CSD have a guaranty fund independent of stock exchange or other market guarantees?

PFMI: Q.4.3.1
AGC: 78

Not applicable [A03]

121 G05Q012

If yes, please respond to the following questions: What is the size of the fund?

PFMI: Q.4.3.1
AGC: 78a.

122 G05Q013

How is the size of the fund determined?

PFMI: Q.4.3.1
AGC: 78b.

123 G05Q014

How is the fund financed?

PFMI: Q.4.3.1
AGC: 78d.

124 G05Q015

If so, what is the amount or percentage per owner?

PFMI: Q.4.3.1
AGC: 78e.

125 G05Q016

If so, what is the amount or percentage per participant?

PFMI: Q.4.3.1
AGC: 78f.

126 G05Q017
Who is covered by the fund?

PFMI: Q.4.3.1
AGC: 78h.

- Direct CSD participants only
- The beneficial owner also
- OTHER:

127 G05Q018
When is the guaranty fund used?

PFMI: Q.4.3.1
AGC: 78j.

- When a broker defaults
- When a direct participant defaults
- OTHER:

128 G05Q019
To what extent do these financial resources cover the payment system's or SSS's current and potential future exposures fully with a high degree of confidence? How frequently does the payment system or SSS evaluate the sufficiency of these financial resources?

PFMI: Q.4.3.2
AGC: n/a

129 G05Q020
If the payment system or SSS is a DNS system in which there is no settlement guarantee, do its participants face credit exposures arising from the payment, clearing and settlement processes? If there are credit exposures in the system, how does the system monitor and measure these exposures?

PFMI: Q.4.3.3
AGC: n/a

130 G05Q021
Does the CSD have insurance to cover losses in the event of Default on settlement commitments by the CSD or a participant?

PFMI: Q.4.3.3
AGC: 91

Not applicable [A03]

131 G05Q022
What is the amount of the coverage?

PFMI: Q.4.3.3
AGC: 91a

132 G05Q023
What is the amount of the deductible?

PFMI: Q.4.3.3
AGC: 91b

133 G05Q024
Please explain other loss or default protections:

PFMI: Q.4.3.3
AGC: 79a

134 G05Q025
Does the CSD accept liability (independent of any insurance coverage) for the following: Any direct damages or losses to participants caused by the CSD in its capacity as a central counterparty?

PFMI: Q.4.3.3
AGC: 66q.

No [A02]

135 G05Q026
If yes, please check all of the following that apply:

PFMI: Q.4.3.3
AGC: 66r.

- Financial limits are imposed on the amount of liability assumed by the CSD
- The CSD assumes liability for direct losses
- The CSD assumes liability for indirect or consequential losses
- OTHER:

136 G05Q027
If the payment system or SSS is a DNS system in which there is no settlement guarantee and has credit exposures among its participants, to what extent does the payment system's or SSS's financial resources cover, at a minimum, the default of the two participants and their affiliates that would create the largest aggregate credit exposure in the system?

PFMI: Q.4.3.4
AGC: n/a

137 G05Q028
How do the CSD's rules and procedures explicitly address any credit losses it may face as a result of any individual or combined default among its participants with respect to any of their obligations to the CSD? How do the CSD's rules and procedures address the allocation of uncovered credit losses and in what order, including the repayment of any funds a CSD may borrow from liquidity providers?

PFMI: Q.4.7.1

AGC: n/a

138 G05Q029

What are the CSD's rules and procedures on the replenishment of the financial resources that are exhausted during a stress event?

PFMI: Q.4.7.2

AGC: n/a

139 G05Q030

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Collateral (PFMI Principle 5)

140 G06Q001

Summary narrative for PFMI Principle 5. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P5

AGC: 35c

141 G06Q002

How does the CSD determine whether a specific asset can be accepted as collateral, including collateral that will be accepted on an exceptional basis? How does the CSD determine what qualifies as an exceptional basis? How frequently does the CSD adjust these determinations? How frequently does the CSD accept collateral on an exceptional basis, and does it place limits on its acceptance of such collateral?

PFMI: Q.5.1.1

AGC: n/a

142 G06Q003

How does the CSD monitor the collateral that is posted so that the collateral meets the applicable acceptance criteria?

PFMI: Q.5.1.2

AGC: n/a

143 G06Q004

How does the CSD identify and mitigate possible specific wrong-way risk, for example, by limiting the collateral it accepts (including collateral concentration limits)?

PFMI: Q.5.1.3
AGC: n/a

144 G06Q005
How frequently does the CSD mark its collateral to market, and does it do so at least daily?

PFMI: Q.5.2.1
AGC: n/a

145 G06Q006
To what extent is the CSD authorised to exercise discretion in valuing assets when market prices do not represent their true value?

PFMI: Q.5.2.2
AGC: n/a

146 G06Q007
How does the CSD determine haircuts?

PFMI: Q.5.2.3
AGC: n/a

147 G06Q008
How does the CSD test the sufficiency of haircuts and validate its haircut procedures, including with respect to the potential decline in the assets' value in stressed market conditions involving the liquidation of collateral? How frequently does the CSD complete this test?

PFMI: Q.5.2.4
AGC: n/a

148 G06Q009
How does the CSD identify and evaluate the potential procyclicality of its haircut calibrations? How does the CSD consider reducing the need for procyclical adjustments – for example, by incorporating periods of stressed market conditions during the calibration of haircuts?

PFMI: Q.5.3.1
AGC: n/a

149 G06Q010
What are the CSD's policies for identifying and avoiding concentrated holdings of certain assets in order to limit potential adverse price effects at liquidation? What factors (for example, adverse price effects or market conditions) are considered when determining these policies?

PFMI: Q.5.4.1
AGC: n/a

150 G06Q011

How does the CSD review and evaluate concentration policies and practices to determine their adequacy? How frequently does the CSD review and evaluate these policies and practices?

PFMI: Q.5.4.2

AGC: n/a

151 G06Q012

What are the legal, operational, market and other risks that the CSD faces by accepting cross-border collateral? How does the CSD mitigate these risks?

PFMI: Q.5.5.1

AGC: n/a

152 G06Q013

How does the CSD ensure that cross-border collateral can be used in a timely manner?

PFMI: Q.5.5.2

AGC: n/a

153 G06Q014

What are the primary features of the CSD's collateral management system?

PFMI: Q.5.6.1

AGC: n/a

154 G06Q015

How and to what extent does the CSD track the reuse of collateral and its rights to the collateral provided?

PFMI: Q.5.6.2

AGC: n/a

155 G06Q016

How and to what extent does the CSD's collateral management system accommodate changes in the ongoing monitoring and management of collateral?

PFMI: Q.5.6.3

AGC: n/a

156 G06Q017

To what extent is the collateral management system staffed to ensure smooth operations even during times of market stress?

PFMI: Q.5.6.4

AGC: n/a

157 G06Q018

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Liquidity risk (PFMI Principle 7)

158 G07Q001

Summary narrative for PFMI Principle 7. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P7

AGC: n/a

159 G07Q002

What is the CSD's framework for managing its liquidity risks, in all relevant currencies, from its participants, settlement banks, nostro agents, custodian banks, liquidity providers and other entities?

PFMI: Q.7.1.1

AGC: n/a

160 G07Q003

What are the nature and size of the CSD's liquidity needs, and the associated sources of liquidity risks, that arise in the CSD in all relevant currencies?

PFMI: Q.7.1.2

AGC: n/a

161 G07Q004

How does the CSD take into account the potential aggregate liquidity risk presented by an individual entity and its affiliates that may play multiples roles with respect to the CSD?

PFMI: Q.7.1.3

AGC: n/a

162 G07Q005

What operational and analytical tools does the CSD have to identify, measure and monitor settlement and funding flows?

PFMI: Q.7.2.1

AGC: n/a

163 G07Q006

How does the CSD use those tools to identify, measure and monitor its settlement and funding flows on an ongoing and timely basis, including its use of intraday liquidity?

PFMI: Q.7.2.2

AGC: n/a

164 G07Q007

How does the payment system or SSS determine the amount of liquid resources in all relevant currencies to effect same day settlement and, where appropriate, intraday or multiday settlement of payment obligations? What potential stress scenarios (including, but not limited to, the default of the participant and its affiliates that would generate the largest aggregate payment obligation in extreme but plausible market conditions) does the payment system or SSS use to make this determination?

PFMI: Q.7.3.1

AGC: n/a

165 G07Q008

What is the estimated size of the liquidity shortfall in each currency that the payment system or SSS would need to cover?

PFMI: Q.7.3.2

AGC: n/a

166 G07Q009

How does the CCP determine the amount of liquid resources in all relevant currencies to settle securities-related payments, make required variation margin payments and meet other payment obligations on time? What potential stress scenarios (including, but not limited to, the default of the participant and its affiliates that would generate the largest aggregate payment obligation in extreme but plausible market conditions) does the CCP use to make this determination?

PFMI: Q.7.4.1

AGC: n/a

167 G07Q010

What is the estimated size of the liquidity shortfall in each currency that would need to be covered, following the default of the participant and its affiliates that would generate the largest aggregate payment obligation to the CCP in extreme but plausible market conditions? How frequently does the CCP estimate this?

PFMI: Q.7.4.2

AGC: n/a

168 G07Q011

Do any of the CCP's activities have a more complex risk profile (such as clearing financial instruments that are characterised by discrete jump-to-default price changes or that are highly correlated with potential participant defaults)? Is the CCP systemically important in multiple jurisdictions?

PFMI: Q.7.4.3

AGC: n/a

169 G07Q012

If the CCP is involved in activities with a more complex risk profile or is systemically important in multiple jurisdictions, has the CCP considered maintaining additional resources sufficient to cover a wider range of stress scenarios that would include the default of the two participants and their affiliates that would generate the largest aggregate payment obligation to the CCP in extreme but plausible market conditions?

PFMI: Q.7.4.4

AGC: n/a

170 G07Q013

What is the size and composition of the CSD's qualifying liquid resources in each currency that is held by the CSD? In what manner and within what time frame can these liquid resources be made available to the CSD?

PFMI: Q.7.5.1

AGC: n/a

171 G07Q014

What prearranged funding arrangements has the CSD established to convert its readily available collateral and investments into cash? How has the CSD established that these arrangements would be highly reliable in extreme but plausible market conditions? Has the CSD identified any potential barriers to accessing its liquid resources?

PFMI: Q.7.5.2

AGC: n/a

172 G07Q015

If the CSD has access to routine credit at the central bank of issue, what is the CSD's relevant borrowing capacity for meeting its minimum liquid resource requirement in that currency?

PFMI: Q.7.5.3

AGC: n/a

173 G07Q016

To what extent does the size and the availability of the CSD's qualifying liquid resources cover its identified minimum liquidity resource requirement in each currency to effect settlement of payment obligations on time?

PFMI: Q.7.5.4

AGC: n/a

174 G07Q017

What is the size and composition of any supplemental liquid resources available to the CSD?

PFMI: Q.7.6.1

AGC: n/a

175 G07Q018

How and on what basis has the CSD determined that these assets are likely to be saleable or

acceptable as collateral to obtain the relevant currency, even if this cannot be reliably prearranged or guaranteed in extreme market conditions?

PFMI: Q.7.6.2

AGC: n/a

176 G07Q019

What proportion of these supplemental assets qualifies as potential collateral at the relevant central bank?

PFMI: Q.7.6.3

AGC: n/a

177 G07Q020

In what circumstances would the CSD use its supplemental liquid resources in advance of, or in addition to, using its qualifying liquid resources?

PFMI: Q.7.6.4

AGC: n/a

178 G07Q021

To what extent does the size and availability of the CSD's supplemental liquid resources, in conjunction with its qualifying liquid resources, cover the relevant liquidity needs identified through the CSD's stress test programme for determining the adequacy of its liquidity resources (see key consideration 9)?

PFMI: Q.7.6.5

AGC: n/a

179 G07Q022

Does the CSD use a liquidity provider to meet its minimum required qualifying liquidity resources? Who are the CSD's liquidity providers? How and on what basis has the CSD determined that each of these liquidity providers has sufficient information to understand and to manage their associated liquidity risk in each relevant currency on an ongoing basis, including in stressed conditions?

PFMI: Q.7.7.1

AGC: n/a

180 G07Q023

How has the CSD determined that each of its liquidity providers has the capacity to perform on its commitment in each relevant currency on an ongoing basis?

PFMI: Q.7.7.2

AGC: n/a

181 G07Q024

How does the CSD take into account a liquidity providers potential access to credit at the central bank of issue?

PFMI: Q.7.7.3

AGC: n/a

182 G07Q025

How does the CSD regularly test the timeliness and reliability of its procedures for accessing its liquid resources at a liquidity provider?

PFMI: Q.7.7.4

AGC: n/a

183 G07Q026

To what extent does the CSD currently have, or is the CSD eligible to obtain, access to accounts, payment services and securities services at each relevant central bank that could be used to conduct its payments and settlements and to manage liquidity risks in each relevant currency?

PFMI: Q.7.8.1

AGC: n/a

184 G07Q027

To what extent does the CSD use each of these services at each relevant central bank to conduct its payments and settlements and to manage liquidity risks in each relevant currency?

PFMI: Q.7.8.2

AGC: n/a

185 G07Q028

If the CSD employs services other than those provided by the relevant central banks, to what extent has the CSD analysed the potential to enhance the management of liquidity risk by expanding its use of central bank services?

PFMI: Q.7.8.3

AGC: n/a

186 G07Q029

What, if any, practical or other considerations to expanding its use of relevant central bank services have been identified by the CSD?

PFMI: Q.7.8.4

AGC: n/a

187 G07Q030

How does the CSD use stress testing to determine the amount and test the sufficiency of its liquid resources in each currency? How frequently does the CSD stress-test its liquid resources?

PFMI: Q.7.9.1

AGC: n/a

188 G07Q031

What is the process for reporting on an ongoing basis the results of the CSD's liquidity stress tests to appropriate decision-makers at the CSD? for the purpose of supporting their timely evaluation and

adjustment of the size and composition of the CSD's liquidity resources and liquidity risk management framework?

PFMI: Q.7.9.2

AGC: n/a

189 G07Q032

What scenarios are used in the stress tests, and to what extent do they take into account a combination of peak historic price volatilities, shifts in other market factors such as price determinants and yield curves, multiple defaults over various time horizons, simultaneous pressures in funding and asset markets, and a spectrum of forward-looking stress scenarios in a variety of extreme but plausible market conditions?

PFMI: Q.7.9.3

AGC: n/a

190 G07Q033

To what extent do the scenarios and stress tests take into account the CSD's particular payment and settlement structure (for example, real-time gross or deferred net, with or without a settlement guarantee, DVP model 1, 2 or 3 for SSSs), and the liquidity risk that is borne directly by the CSD? by its participants, or both?

PFMI: Q.7.9.4

AGC: n/a

191 G07Q034

To what extent do the scenarios and stress tests take into account the nature and size of the liquidity needs, and the associated sources of liquidity risks, that arise in the CSD to settle its payment obligations on time, including the potential that individual entities and their affiliates may play multiples roles with respect to the CSD?

PFMI: Q.7.9.5

AGC: n/a

192 G07Q035

How frequently does the CSD assess the effectiveness and appropriateness of stress test assumptions and parameters? How does the CSD's stress test programme take into account various conditions, such as a sudden and significant increase in position and price volatility, position concentration, change in market liquidity, and model risk including shift of parameters?

PFMI: Q.7.9.6

AGC: n/a

193 G07Q036

How does the CSD validate its risk management model? How frequently does it perform this validation?

PFMI: Q.7.9.7

AGC: n/a

194 G07Q037

Where and to what extent does the CSD document its supporting rationale for, and its governance arrangements relating to, the amount and form of its total liquid resources?

PFMI: Q.7.9.8
AGC: n/a

195 G07Q038
How do the CSD's rules and procedures enable it to settle payment obligations on time following any individual or combined default among its participants?

PFMI: Q.7.10.1
AGC: n/a

196 G07Q039
How do the CSD's rules and procedures address unforeseen and potentially uncovered liquidity shortfalls and avoid unwinding, revoking or delaying the same day settlement of payment obligations?

PFMI: Q.7.10.2
AGC: n/a

197 G07Q040
How do the CSD's rules and procedures allow for the replenishment of any liquidity resources employed during a stress event?

PFMI: Q.7.10.3
AGC: n/a

198 G06Q041
filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

Settlement finality (PFMI Principle 8)

199 G08Q015
filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

200 G08Q001
Summary narrative for PFMI Principle 8. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to

supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P8
AGC: n/a

201 G08Q002

At what point is the settlement of a payment, transfer instruction or other obligation final, meaning irrevocable and unconditional? Is the point of settlement finality defined and documented? How and to whom is this information disclosed?

PFMI: Q.8.1.1
AGC: n/a

202 G08Q003

How does the CSD's legal framework and rules, including the applicable insolvency law(s), acknowledge the discharge of a payment, transfer instruction or other obligation between the CSD and its participants, or between participants?

PFMI: Q.8.1.2
AGC: n/a

203 G08Q004

How does the CSD demonstrate that there is a high degree of legal certainty that finality will be achieved in all relevant jurisdictions (for example, by obtaining a well reasoned legal opinion)?

PFMI: Q.8.1.3
AGC: n/a

204 G08Q005

How does the CSD ensure settlement finality in the case of linkages with other CSD?? a) For an SSS, how is consistency of finality achieved between the SSS and, if relevant, the LVPS where the cash leg is settled? b) For a CCP for cash products, what is the relation between the finality of obligations in the CCP and the finality of the settlement of the CCP claims and obligations in other systems, depending on the rules of the relevant CSD/SSS and payment system?

PFMI: Q.8.1.4
AGC: n/a

205 G08Q006

Is the CSD designed to complete final settlement on the value date (or same day settlement)? How does the CSD ensure that final settlement occurs no later than the end of the intended value date?

PFMI: Q.8.2.1
AGC: n/a

206 G08Q007

Has the CSD ever experienced deferral of final settlement to the next business day that was not contemplated by its rules, procedures or contracts? If so, under what circumstances? If deferral was a result of the CSD's actions, what steps have been taken to prevent a similar situation in the future?

PFMI: Q.8.2.2
AGC: n/a

207 G08Q008
Does the CSD provide intraday or real-time final settlement? If so, how? How are participants informed of the final settlement?

PFMI: Q.8.2.3
AGC: n/a

208 G08Q009
If settlement occurs through multiple-batch processing, what is the frequency of the batches and within what time frame do they operate? What happens if a participant does not have enough funds or securities at the settlement time? Are transactions entered in the next batch? If so, what is the status of those transactions and when would they become final?

PFMI: Q.8.2.4
AGC: n/a

209 G08Q010
If settlement does not occur intraday or in real time, how has the LVPS or SSS considered the introduction of either of these modalities?

PFMI: Q.8.2.5
AGC: n/a

210 G08Q011
How does the CSD define the point at which unsettled payments, transfer instructions or other obligations may not be revoked by a participant? How does the CSD prohibit the unilateral revocation of accepted and unsettled payments, transfer instructions or obligations after this time?

PFMI: Q.8.3.1
AGC: n/a

211 G08Q012
Under what circumstances can an instruction or obligation accepted by the system for settlement still be revoked (for example, queued obligations)? How can an unsettled payment or transfer instruction be revoked? Who can revoke unsettled payment or transfer instructions?

PFMI: Q.8.3.2
AGC: n/a

212 G08Q013
Under what conditions does the CSD allow exceptions and extensions to the revocation deadline?

PFMI: Q.8.3.3
AGC: n/a

213 G08Q014

Where does the CSD define this information? How and to whom is this information disclosed?

PFMI: Q.8.3.4

AGC: n/a

Money settlements (PFMI Principle 9)

214 G09Q001

Summary narrative for PFMI Principle 9. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P9

AGC: n/a

215 G09Q002

How does the CSD conduct money settlements? If the CSD conducts settlement in multiple currencies, how does the CSD conduct money settlement in each currency?

PFMI: Q.9.1.1

AGC: n/a

216 G09Q003

Who accepts cash deposits (or makes payment credit accommodations) for CSD transactions?

PFMI: Q.9.1.1

AGC: 31

- CSD
- Central Bank
- Banks appointed by CSD
- Neither or others (e.g. credit lines used)
- Not applicable
- OTHER:

217 G09Q004

Please indicate the name of the banks appointed by the CSD

PFMI: Q.9.1.1

AGC: 31a

218 G09Q005

Who processes cash clearing (or draws on credit lines, if applicable) for CSD transactions?

PFMI: Q.9.1.1

AGC: 32

- CSD
- Central Bank

- Banks appointed by the CSD
- Neither or others (e.g. credit lines used)
- Not applicable
- OTHER:

219 G09Q006
Please name banks appointed by the CSD

PFMI: Q.9.1.1
AGC: 32a

220 G09Q007
Who controls the movement of cash for cash deposits (or draws on credit lines, if applicable)?

PFMI: Q.9.1.1
AGC: 33, 33b

- CSD
- Central Bank
- Banks appointed by CSD
- Neither or others (e.g. credit lines used)
- Not applicable
- OTHER:

221 G09Q008
Please name banks appointed by the CSD

PFMI: Q.9.1.1
AGC: 33a

222 G09Q009
Who controls the movement of cash for cash clearing (or for draws on credit lines, if applicable)?

PFMI: Q.9.1.1
AGC: 34

- CSD
- Central Bank
- Banks appointed by CSD
- Neither or others (e.g. credit lines used)
- Not applicable
- OTHER:

223 G09Q010
Please name banks appointed by CSD

PFMI: Q.9.1.1
AGC: 34a

224 G09Q011
If the CSD does not settle in central bank money, why is that?

PFMI: Q.9.1.2
AGC: n/a

225 G09Q012

If central bank money is not used, how does the CSD assess the credit and liquidity risks of the settlement asset used for money settlement?

PFMI: Q.9.2.1

AGC: n/a

226 G09Q013

If the CSD settles in commercial bank money, how does the CSD select its settlement banks? What are the specific selection criteria the CSD uses?

PFMI: Q.9.2.2

AGC: n/a

227 G09Q014

How does the CSD monitor the settlement banks adherence to criteria it uses for selection? For example, how does the CSD evaluate the banks regulation, supervision, creditworthiness, capitalisation, access to liquidity and operational reliability?

PFMI: Q.9.3.1

AGC: n/a

228 G09Q015

How does the CSD monitor, manage and limit its credit and liquidity risks arising from the commercial settlement banks? How does the CSD monitor and manage the concentration of credit and liquidity exposures to these banks?

PFMI: Q.9.3.2

AGC: n/a

229 G09Q016

How does the CSD assess its potential losses and liquidity pressures as well as those of its participants if there is a failure of its largest settlement bank?

PFMI: Q.9.3.3

AGC: n/a

230 G09Q017

If an CSD conducts money settlements on its own books, how does it minimise and strictly control its credit and liquidity risks?

PFMI: Q.9.4.1

AGC: n/a

231 G09Q018

Do the CSD's legal agreements with its settlement banks state when transfers occur, that transfers are

final when effected, and that funds received are transferable?

PFMI: Q.9.5.1
AGC: n/a

232 G09Q019

Are funds received transferable by the end of the day at the latest? If not, why? Are they transferable intraday? If not, why?

PFMI: Q.9.5.2
AGC: n/a

233 G09Q020

filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

Physical deliveries (PFMI Principle 10)

234 G10Q001

Summary narrative for PFMI Principle 10. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P10
AGC: n/a

235 G10Q002

Which asset classes does the CSD accept for physical delivery?

PFMI: Q.10.1.1
AGC: n/a

236 G10Q003

How does the CSD define its obligations and responsibilities with respect to the delivery of physical instruments or commodities? How are these responsibilities defined and documented? To whom are these documents disclosed?

PFMI: Q.10.1.2
AGC: n/a

237 G10Q004

How does the CSD engage with its participants to ensure they have an understanding of their obligations and the procedures for effecting physical delivery?

PFMI: Q.10.1.3
AGC: n/a

238 G10Q005
How are eligible securities lodged in the CSD system?

PFMI: Q.10.1.3
AGC: 57, 57a

- A registered certificate in the name of the CSD is delivered to the CSD.
- A participant delivers the security with a valid transfer deed or stock power or other transfer document to the CSD which then effects registration.
- A registrar re-registers the security in the name of the CSD.
- Not applicable
- OTHER: The issuer submits a file to ATHEXCSD that includes the quantity of securities to be recorded to the beneficial owner accounts

239 G10Q006
When are securities lodged into the CSD reflected in a participant's CSD account?

PFMI: Q.10.1.3
AGC: 58, 58a

- Securities are reflected in the participant's CSD account immediately upon delivery to the CSD.
- Securities are re-registered prior to being reflected in the participant CSD account.
- Not applicable
- OTHER: Securities are reflected to the beneficial owner accounts upon delivery to ATHEXCSD

240 G10Q007
How long does it usually take to lodge securities with the CSD?

PFMI: Q.10.1.3
AGC: 59, 59b

3 days to 1 week [A02]

241 G10Q008
Please specify

PFMI: Q.10.1.3
AGC: 59a

242 G10Q009
During the process of lodging securities into the CSD, can the securities be traded?

PFMI: Q.10.1.3
AGC: 60

No [A02]

243 G10Q010
During the process of lodging securities into the CSD, can the securities be settled?

PFMI: Q.10.1.3

AGC: 60a

No [A02]

244 G10Q011

During the process of lodging securities into the CSD, can the securities have ownership transferred?

PFMI: Q.10.1.3

AGC: 60b

No [A02]

245 G10Q012

If they cannot be traded, or if you answered other, please explain

PFMI: Q.10.1.3

AGC: 60c

246 G10Q013

If they cannot be settled, or if you answered other, please explain

PFMI: Q.10.1.3

AGC: 60d

They constitute provisional entries until the date stated in the ATHEX/ATHEXCSD decision for the lodging (for example, for listed securities, the first day of trading in markets operated by ATHEX).

247 G10Q014

If ownership cannot be transferred, or if you answered other, please explain

PFMI: Q.10.1.3

AGC: 60e

They constitute provisional entries until the date stated in the ATHEX/ATHEXCSD decision for the lodging (for example, for listed securities, the first day of trading in markets operated by ATHEX).

248 G10Q015

Are securities immediately available for delivery upon transfer to the CSD?

PFMI: Q.10.1.3

AGC: 61, 61d

No [A02]

249 G10Q016

If no: Securities are unavailable for

PFMI: Q.10.1.3

AGC: 61a

Other: Up to 1 day

250 G10Q017
If more than 4 weeks, please specify

PFMI: Q.10.1.3
AGC: 61b

251 G10Q018
If not applicable, please explain

PFMI: Q.10.1.3
AGC: 61c

252 G10Q019
What transfer process steps are involved when eligible securities are withdrawn from the CSD for safekeeping?

PFMI: Q.10.1.3
AGC: 63, 63a

Other: A security may be removed from the depository, following a relevant decision, for example, if it is delisted from ATHEX. The issuer is responsible to re-certificate the securities based on information received by ATHEXCSD or to issue securities in physical form.

253 G10Q020
How long does it usually take to remove securities from the CSD?

PFMI: Q.10.1.3
AGC: 64, 64b

3 days to 1 week [A02]

254 G10Q021
If more than 4 weeks, please specify

PFMI: Q.10.1.3
AGC: 64a

255 G10Q022
While the securities are being removed from the CSD, can they be traded? (Choose one)

PFMI: Q.10.1.3
AGC: 65a

No [A01]

256 G10Q023
If they cannot be traded please explain

PFMI: Q.10.1.3
AGC: 65b

They have been suspended from trading and delisted from ATHEX, prior to removal.

257 G10Q024

While the securities are being removed from the CSD, can they be settled? (Choose one)

PFMI: Q.10.1.3

AGC: 65c

Other: Unsettled pending transactions and OTC transfers may be settled

258 G10Q025

If they cannot be settled, please explain

PFMI: Q.10.1.3

AGC: 65d

259 G10Q026

While the securities are being removed from the CSD, can they have ownership transferred? (Choose one)

PFMI: Q.10.1.3

AGC: 65e

Yes [A03]

260 G10Q027

If ownership cannot be transferred, please explain

PFMI: Q.10.1.3

AGC: 65f

261 G10Q028

How does the CSD identify the risks and costs associated with storage and delivery of physical instruments or commodities? What risks and costs has the CSD identified?

PFMI: Q.10.2.1

AGC: n/a

262 G10Q029

What are the vault security procedures for the safekeeping of physical paper?

PFMI: Q.10.2.1

AGC: 75

- Not applicable, no vault is maintained
- Electronic keys or combinations
- Dual access control
- Visitor logs
- Vault counts
- Intrusion alarms
- Fire alarms
- Guards
- OTHER:

263 G10Q030
Please indicate frequency of vault counts:

PFMI: Q.10.2.1
AGC: 75a.

264 G10Q031
Please explain:

PFMI: Q.10.2.1
AGC: 75b

265 G10Q032
What processes, procedures and controls does the CSD have to monitor and manage any identified risks and costs associated with storage and delivery of physical instruments or commodities?

PFMI: Q.10.2.2
AGC: n/a

266 G10Q033
If an CSD can match participants for delivery and receipt, under what circumstances can it do so, and what are the associated rules and procedures? Are the legal obligations for delivery clearly expressed in the rules and associated agreements?

PFMI: Q.10.2.3
AGC: n/a

267 G10Q034
How does the CSD monitor its participants' delivery preferences and, to the extent practicable, ensure that its participants have the necessary systems and resources to be able to fulfil their physical delivery obligations?

PFMI: Q.10.2.4
AGC: n/a

268 G10Q035
filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

Central Securities Depositories (PFMI Principle 11)

269 G11Q001
Summary narrative for PFMI Principle 11. Please provide a summary narrative disclosure with sufficient

detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P11

AGC: n/a

270 G11Q002

CSD FUNCTIONALITY AND SERVICES, USE OF AGENTS. Certain functionalities and services reduce risk to an investor if provided in an efficient manner. The purpose of this section is to identify those functionalities that may potentially be offered by depositories and clearing systems around the world, and ascertain whether they are offered by your institution. For which of the following security types do you serve as a CSD or clearing system?

PFMI: n/a

AGC: 26

- Government securities
- Equities
- Corporate bonds
- Corporate money market
- Not applicable
- OTHER: Subscription rights, ETFs, HDRs, warrants, non-listed corporate bonds and non-listed shares

271 G11Q003

Please name the other security types:

PFMI: n/a

AGC: 26a.

Subscription rights, ETFs, HDRs, warrants, non-listed corporate bonds and non-listed shares

272 G11Q004

Is the use of the CSD in your market compulsory by law or compulsory by market practice for the settlement or safekeeping of all instrument types in your market (e.g. equities, government securities, corporate bonds, money market instruments, warrants, derivatives etc).

PFMI: n/a

AGC: 27, 27c

- Yes by law for settlement of all instrument types
- Yes by law for safekeeping of all instrument types
- Yes by market practice for settlement of all instrument types
- Yes by market practice for safekeeping of all instrument types
- Yes by law for settlement, but not for all instrument types
- Yes by law for safekeeping, but not for all instrument type
- Yes by market practice for settlement, but not for all instrument types
- Yes by market practice for safekeeping, but not for all instrument types
- Neither
- OTHER:

273 G11Q005

Please list the instrument types for which it is not compulsory by law to: (i) settle in your CSD

PFMI: n/a

AGC: 27a. (i)

Government bonds.

(Are issued at the Central Bank's CSD (BoGS) but it is obligatory to have them dual-listed on ATHEX as well (and thus settled by ATHEXCSD)).

274 G11Q006

(ii) safekeep in your CSD:

PFMI: n/a

AGC: 27a. (ii)

Government bonds.

(Are issued at the Central Bank's CSD (BoGS) but it is obligatory to have them dual-listed on ATHEX as well (and thus settled by ATHEXCSD)).

275 G11Q007

Please list the instrument types for which it is not compulsory by market practice to: (i) settle in your CSD

PFMI: n/a

AGC: 27b. (i)

276 G11Q008

(ii) safekeep in your CSD:

PFMI: n/a

AGC: 27b. (ii)

277 G11Q009

Settlement and Safekeeping Percentages 28a Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) settled within your institution, exclusive of your links with third parties.

PFMI: n/a

AGC: 28 28a

100% for all listed equities, corporate bonds, ETF, HDR and warrants. Less than 1% for Government bonds settled by ATHEXCSD.

278 G11Q010

Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) held in safekeeping within your institution.

PFMI: n/a

AGC: 28b.

100% for all listed equities, corporate bonds, ETF, HDR and warrants. Less than 1% for Government bonds held through ATHEXCSD

279 G11Q011

How are the rights of securities issuers and holders safeguarded by the rules, procedures and controls of the CSD?

PFMI: Q.11.1.1

AGC: n/a

280 G11Q012

In the event a participant's single or main account is blocked for any reason (e.g., insolvency, penalties, violations, liens), would securities held in any account or accounts on behalf of the participant's clients be accessible: By the participant's clients?

PFMI: Q.11.1.1

AGC: 44a

Yes [A01]

281 G11Q013

If yes, please describe briefly how clients of participants would access their securities and whether there would be any delay in their ability to do so:

PFMI: Q.11.1.1

AGC: 44b

The Dematerialised Securities System of ATHEXCSD provides for an end-investor account structure. Therefore, all Security Accounts maintained in the DSS are administered by participants but are opened in the name of the beneficiary owner. Consequently, in the event where a participant's single account is blocked, the securities belonging to its client will not be affected as they are kept and operated in completely separate accounts.

282 G11Q014

By the intervening authorities controlling insolvency or other proceedings?

PFMI: Q.11.1.1

AGC: 44d.

Yes [A01]

283 G11Q015

If yes, please describe briefly under what conditions access would be granted to the intervening authorities:

PFMI: Q.11.1.1

AGC: 44e.

Access is granted under the condition that the clients of the insolvent participant are reimbursed in securities and/or in cash in relation to the provision of investment services as provided by article 22 law 3606/2007

284 G11Q016

By the participant's creditors?

PFMI: Q.11.1.1
AGC: 44g, 44i

Not applicable [A03]

285 G11Q017

If yes, please describe briefly under what conditions access would be granted to the participant's creditors:

PFMI: Q.11.1.1
AGC: 44h

286 G11Q018

By the CSD's creditors?

PFMI: Q.11.1.1
AGC: 44j.

Not applicable [A03]

287 G11Q019

If yes, please describe briefly under what conditions access would be granted to the CSD's creditors:

PFMI: Q.11.1.1
AGC: 44k.

288 G11Q020

What is your document and record retention policy for documents and records described above in this section?

PFMI: Q.11.1.1
AGC: 47, 47a

Other: As stipulated on Article 2 paragraph 6 of the DSS Operation Regulation of ATHEXCSD, complying with Hellenic Law, ATHEXCSD maintains historical data on trades and transactions for a period of 6 years. It should be noted that Security Account balances are retained forever.

289 G11Q021

Does the law protect participant assets from claims and liabilities of the CSD?

PFMI: Q.11.1.1
AGC: 54

Yes [A01]

290 G11Q022

Can the CSD assess a lien on participant accounts? (A lien would entitle the CSD to take and hold or sell the securities of the participant in payment of a debt.)

PFMI: Q.11.1.1
AGC: 55

No [A02]

291 G11Q023
If yes, for what reasons are liens or similar claims imposed?

PFMI: Q.11.1.1
AGC: 55a

- Fees and expenses
- Collateralization of overdrafts
- To secure payment for purchased securities
- OTHER:

292 G11Q024
Please describe:

PFMI: Q.11.1.1
AGC: 55b

293 G11Q025
Please indicate the limits of this lien as indicated below:

PFMI: Q.11.1.1
AGC: 55c

294 G11Q026
Please explain:

PFMI: Q.11.1.1
AGC: 55d

295 G11Q027
If a lien is placed on a participant's account which has been designated for its clients, will the CSD select certain securities to be subject to the lien?

PFMI: Q.11.1.1
AGC: 55e

No [A02]

296 G11Q028
If yes, please indicate whether:

PFMI: Q.11.1.1
AGC: 55f

297 G11Q029
Please explain:

PFMI: Q.11.1.1

AGC: 55g

298 G11Q030

If no, please indicate whether the entire account will be subject to the lien.

PFMI: Q.11.1.1

AGC: 55h

No [A02]

299 G11Q031

For accounts designated as client accounts, do procedures exist to restrict the placement of liens only to obligations arising from safe custody and administration of those accounts?

PFMI: Q.11.1.1

AGC: 55j

No [A02]

300 G11Q032

If yes, are the restrictions accomplished by:

PFMI: Q.11.1.1

AGC: 55k

301 G11Q033

Please explain:

PFMI: Q.11.1.1

AGC: 55l

302 G11Q034

Transfer of Legal Ownership. Does the CSD have legal authority to transfer title to securities?

PFMI: Q.11.1.1

AGC: 56, 56e

Yes [A01]

303 G11Q035

When does title or entitlement to CSD securities pass between participants?

PFMI: Q.11.1.1

AGC: 56a

When corresponding money or other consideration is transferred [A02]

304 G11Q036

Please describe:

PFMI: Q.11.1.1

AGC: 56b

305 G11Q037

Where does title or entitlement to CSD securities pass between participants?

PFMI: Q.11.1.1

AGC: 56c

On the CSD books [A01]

306 G11Q038

Please describe:

PFMI: Q.11.1.1

AGC: 56d

307 G11Q039

How do the CSD's rules, procedures and controls ensure that the securities it holds on behalf of participants are appropriately accounted for on its books and protected from risks associated with the other services the CSD may provide?

PFMI: Q.11.1.2

AGC: n/a

308 G11Q040

In what form does the CSD maintain records identifying the assets of each participant?

PFMI: Q.11.1.2

AGC: 45

- Computer file
- Microfiche
- Hard copy
- Computer tape
- OTHER:

309 G11Q041

In which format is the source data maintained?

PFMI: Q.11.1.2

AGC: 45b

ATHEXCSD's database files and backup archives

310 G11Q042

How does the CSD ensure that it has robust accounting practices? Do audits review whether there are sufficient securities to satisfy customer rights? How frequently are end-to-end audits conducted to examine the procedures and internal controls used in the safekeeping of securities?

PFMI: Q.11.1.3

AGC: n/a

311 G11Q043

What are the CSD's internal procedures to authorise the creation and deletion of securities? What are the CSD's internal controls to prevent the unauthorised creation and deletion of securities?

PFMI: Q.11.1.4

AGC: n/a

312 G11Q044

Does the CSD conduct periodic and at least daily reconciliation of the totals of securities issues in the CSD for each issuer (or its issuing agent)? How does the CSD ensure that the total number of securities recorded in the CSD for a particular issue is equal to the amount of securities of that issue held on the CSD's books?

PFMI: Q.11.1.5

AGC: n/a

313 G11Q045

If the CSD is not the official registrar of the issues held on its books, how does the CSD reconcile its records with official registrar?

PFMI: Q.11.1.6

AGC: n/a

314 G11Q046

If the securities held with the CSD are recorded by book-entry at the registrar, what are the control features at the registrar for transfer of registrar positions to and from the CSD (e.g., authentication procedures, reconciliation, confirmation of position at registrar)? Please describe:

PFMI: Q.11.1.6

AGC: 52i

ATHEXCSD, in its function as a CSD, is appointed by law as the registrar for dematerialized securities traded in markets operated by the ATHEX (Extended Notary Function). Having this dual role, depository and registrar, there is no need to utilize specific procedures for the transfer of positions, since depository and registry roles coincide. Settlement takes place directly in the beneficiary owners accounts and therefore, settlement and registry at beneficiary owners level is simultaneous

315 G11Q047

How does the CSD prevent overdrafts and debit balances in securities accounts?

PFMI: Q.11.2.1

AGC: n/a

316 G11Q048

Are securities issued or maintained in a dematerialised form? What percentage of securities is dematerialised, and what percentage of the total volume of transactions applies to these securities?

PFMI: Q.11.3.1

AGC: n/a

317 G11Q049
How are CSD eligible securities held by the CSD?

PFMI: Q.11.3.1
AGC: 50, 50a

In dematerialized form
 In certificated form
 OTHER:

318 G11Q050
If securities are issued as a physical certificate, is it possible to immobilise them and allow their holding and transfer in a book-entry system? What percentage of securities is immobilised, and what percentage of the total volume of transactions applies to immobilised securities?

PFMI: Q.11.3.2
AGC: n/a

319 G11Q051
If CSD eligible securities are certificated, can CSD eligible securities be held outside of the CSD?

PFMI: Q.11.3.2
AGC: 51

Not applicable [A05]

320 G11Q052
If certain designated securities are held outside the CSD, please indicate under which conditions these securities would be held outside the CSD:

PFMI: Q.11.3.2
AGC: 51a

321 G11Q053
If CSD eligible securities are required to be centrally immobilized at the CSD, where and with whom are the certificates safekept? (then please answer 51c)

PFMI: Q.11.3.2
AGC: 51b

322 G11Q054
Are these certificates:

PFMI: Q.11.3.2
AGC: 51c

Bearer
 Registered
 OTHER:

323 G11Q055
If registered, how are the CSD eligible securities registered?

PFMI: Q.11.3.2
AGC: 51d

- In the name of the CSD
- In the name of the depositing participant or its nominee
- In the name of a separate nominee of the CSD
- OTHER:

324 G11Q056

If in the name of a separate nominee, please identify by name the nominee used:

PFMI: Q.11.3.2
AGC: 51f

325 G11Q057

If CSD eligible securities may be held either in or out of the CSD, are these certificates:

PFMI: Q.11.3.2
AGC: 51h

326 G11Q058

What are the control features for receipt of certificates to the CSD (e.g., authentication procedures, re-registration)? Please describe:

PFMI: Q.11.3.2
AGC: 51i

327 G11Q059

If securities are dematerialized: May dematerialized security positions be re-certificated and held outside the CSD?

PFMI: Q.11.3.2
AGC: 52

Other: According to Law 2396/96, in case a Company ceases being listed and its securities are no longer traded in ATHEX's organised Markets, the securities may, upon request of the investor, take a certificated (physical) form

328 G11Q060

Are the securities held:

PFMI: Q.11.3.2
AGC: 52a, 52k

- Through book-entry at the CSD
- Through book-entry at a registrar or issuer
- OTHER:

329 G11Q061

Please identify which types of entities may act as registrars:

PFMI: Q.11.3.2

AGC: 52b

- Issuers
- Separate companies that perform registrar functions
- CSD
- OTHER:

330 G11Q062

If the securities held by the CSD are recorded by book entry at the registrar, are the securities registered only to the CSD, with the CSD providing the function of recording ownership on a centralized basis for the market?

PFMI: Q.11.3.2
AGC: 52d

Yes [A01]

331 G11Q063

If yes, how are securities held at the registrar for the account of the CSD?

PFMI: Q.11.3.2
AGC: 52e

Other: Securities are held at segregated securities account in the name of beneficial owner but within the Dematerialised Securities System of ATHEXCSD and are operated (administered) by ATHEXCSD Account Operators (participants in the Dematerialised Securities System). ATHEXCSD performs the extended notary function by law.

332 G11Q064

Please describe:

PFMI: Q.11.3.2
AGC: 52f

333 G11Q065

If the securities held with the CSD are recorded by book-entry at the registrar but are not registered exclusively to the CSD, may they be registered to:

PFMI: Q.11.3.2
AGC: 52g

334 G11Q066

Please describe:

PFMI: Q.11.3.2
AGC: 52h

335 G11Q067

What incentives, if any, does the CSD provide to immobilise or dematerialise securities?

PFMI: Q.11.3.3
AGC: n/a

336 G11Q068
How do the CSD's rules and procedures protect assets against custody risk, including the risk of loss because of the CSD's negligence, misuse of assets, fraud, poor administration, inadequate recordkeeping or failure to protect participants' interests in their securities?
PFMI: Q.11.4.1
AGC: n/a

337 G11Q069
Does the CSD accept liability (independent of any insurance coverage) for the following: Reconciliation errors with the registrar and/or the issuer that result in direct damages or losses to participants?
PFMI: Q.11.4.1
AGC: 66, 66a, 66d
No [A01]

338 G11Q070
If yes, please check all of the following that apply:
PFMI: Q.11.4.1
AGC: 66b 66c
 Financial limits are imposed on the amount of liability assumed by the CSD
 The CSD assumes liability for direct losses
 The CSD assumes liability for indirect or consequential losses
 OTHER:

339 G11Q071
Theft of securities (either physical certificate or electronically from accounts at the CSD) from the CSD that results in direct damages or losses to participants?
PFMI: Q.11.4.1
AGC: 66e, 66g, 66h
Yes [A02]

340 G11Q072
If yes, please check all of the following that apply:
PFMI: Q.11.4.1
AGC: 66f
 Financial limits are imposed on the amount of liability assumed by the CSD
 The CSD assumes liability for direct losses
 The CSD assumes liability for indirect or consequential losses
 OTHER:

341 G11Q073
Failure of the CSD's systems that result in direct damages or losses to participants because they cannot use either securities or funds?
PFMI: Q.11.4.1
AGC: 66i, 66l.

No [A01]

342 G11Q074

If yes, please check all of the following that apply:

PFMI: Q.11.4.1

AGC: 66j, 66k

- Financial limits are imposed on the amount of liability assumed by the CSD
- The CSD assumes liability for direct losses
- The CSD assumes liability for indirect or consequential losses
- OTHER:

343 G11Q075

Any direct damages or losses to participants caused by the CSD due to its errors, omissions or fraud?

PFMI: Q.11.4.1

AGC: 66m, 66p.

- Yes
- No
- Not applicable
- OTHER:

344 G11Q076

If yes, please check all of the following that apply:

PFMI: Q.11.4.1

AGC: 66n.

- Financial limits are imposed on the amount of liability assumed by the CSD
- The CSD assumes liability for direct losses
- The CSD assumes liability for indirect or consequential losses
- OTHER:

345 G11Q077

How has the CSD determined that those rules and procedures are consistent with the legal framework?

PFMI: Q.11.4.2

AGC: n/a

346 G11Q078

Is the CSD immune from legal action in its own jurisdiction?

PFMI: Q.11.4.2

AGC: 68

No [A02]

347 G11Q079

What other methods, if any, does the CSD employ to protect its participants against misappropriation, destruction and theft of securities (for example, insurance or other compensation schemes)?

PFMI: Q.11.4.3

AGC: n/a

348 G11Q080

Does the CSD have Fidelity insurance (that is, insurance to cover loss of securities or money resulting, for example, from acts such as forgery, theft, fraud and/or employee dishonesty)?

PFMI: Q.11.4.3

AGC: 92

Other: Direct Financial Loss and Professional Indemnity Total coverage EUR 35 million, deductible EUR 200,000 per case

349 G11Q081

What is the amount of the coverage?

PFMI: Q.11.4.3

AGC: 92a.

350 G11Q082

What is the amount of the deductible?

PFMI: Q.11.4.3

AGC: 92b.

351 G11Q083

Does the CSD have insurance for Operational Errors?

PFMI: Q.11.4.3

AGC: 93

Other: Direct Financial Loss and Professional Indemnity Total coverage EUR 35 million, deductible EUR 200,000 per case

352 G11Q084

What is the amount of the coverage?

PFMI: Q.11.4.3

AGC: 93a.

353 G11Q085

What is the amount of the deductible?

PFMI: Q.11.4.3

AGC: 93b.

354 G11Q086

Does the CSD have Errors and Omissions insurance?

PFMI: Q.11.4.3

AGC: 94

Yes [A01]

355 G11Q087
What is the amount of the coverage?

PFMI: Q.11.4.3
AGC: 94a.

Direct Financial Loss and Professional Indemnity Total coverage EUR 35 million.

356 G11Q088
What is the amount of the deductible?

PFMI: Q.11.4.3
AGC: 94b.

Direct Financial Loss and Professional Indemnity deductible EUR 200,000 per case.

357 G11Q089
Does the CSD have insurance for the Premises?

PFMI: Q.11.4.3
AGC: 95

Yes [A01]

358 G11Q090
What is the amount of the coverage?

PFMI: Q.11.4.3
AGC: 95a.

Against Fire contract: EUR 22,992,500 (for all buildings)

359 G11Q091
What is the amount of the deductible?

PFMI: Q.11.4.3
AGC: 95b.

Deductible per case 10% of the covered capital for every damage, Political Risks and terrorists acts:
5% of the covered capital for every damage, Earthquake: 2% of the covered capital for every damage.

360 G11Q092
Does the CSD have any other insurance?

PFMI: Q.11.4.3
AGC: 96, 96d

Yes [A01]

361 G11Q093
If so, what is it for?

PFMI: Q.11.4.3
AGC: 96a.

- a) Directors and Officers responsibility
- b) Civil Liability
- c) Loss of money damages

362 G11Q094
What is the amount of the coverage?

PFMI: Q.11.4.3
AGC: 96b.

Directors and Officers responsibility: EUR 50 million per case - aggregate per year.
Civil Liability: a) Against third party EUR 2 million b) Personnel EUR 0,5 million.
Cash Transfers: a) € 6,000.00: loss of money during transfer b) € 40,000.00: i) loss of money as a result of theft - fund robbery (hold up) and ii) loss of the funds held in the security cabinet of our accounting division.

363 G11Q095
What is the amount of the deductible?

PFMI: Q.11.4.3
AGC: 96c.

Directors and Officers responsibility: EUR 50,000 per case - aggregate per year.
Civil Liability Professional Indemnity Insurance.
Deductible per case:
(a) Employer's civil liability: First 3 working days of the date / time of the accident
(b) Third party Civil liability: 600 € per case
maximum liability € 4,500,000.00 for both a & b.

Loss of money damages: 0.

364 G11Q096
Who is the insurance carrier? If more than one insurance carrier, please list each carrier here and provide your responses to questions 97a and 97b in corresponding order.

PFMI: Q.11.4.3
AGC: 97

Depending on the type of insurance AIG, ETHNIKI Hellenic General Insurance Company S.A, Europe Insurance Co, Europe Insurance Co, Interamerican

365 G11Q097
Who is the insurance carrier's parent company, if applicable? (If inapplicable, simply type n/a.)

PFMI: Q.11.4.3
AGC: 97a.

Directors and Officers responsibility: 1) AIG: 100% (1st contract: amount of coverage 15 million), 2) Ethniki : 100% (2nd contract: amount of coverage 35 million). Direct Financial Loss and Professional Indemnity: Ethniki: 100% - Premises Insurance: AIG 70%, Europe 30% Civil Liability: Interamerican 100%, - Cash Transfers: Interamerican 100%

366 G11Q098

What is the term of the policy?

PFMI: Q.11.4.3

AGC: 97b.

Directors and Officers responsibility: 08/12/2017 - 07/12/2018. Direct Financial Loss and Professional Indemnity: 08/12/2017-07/12/2018. Premises Insurance: 31/01/2018-31/01/2019. Civil Liability: 31/01/2018-31/01/2019. Cash Transfers: 31/01/2018-31/01/2019

367 G11Q099

Who does the insurance cover?

PFMI: Q.11.4.3

AGC: 97c, 97d

CSD

Direct CSD participants

Final investors

Not applicable

OTHER: Depending on the type of insurance. Directors and Officers responsibility: ATHEX Group. Direct Financial Loss and Professional Indemnity: ATHEX and all group employees. Premises: ATHEX Group.

368 G11Q100

If you feel that you would like to provide additional details on any of the given answers, feel free to provide any additional comments here (maximum of 5,000 characters) or prepare an additional document identifying the question(s) you are commenting on and upload the document under 98a:

PFMI: Q.11.4.3

AGC: 98

369 G11Q101

filecount - Upload document here:

PFMI: Q.11.4.3

AGC: 98a.

0

370 G11Q102

Do the CSD's written contracts, rules, or established practices and procedures provide protection against risk of loss of participant assets by the CSD in the form of indemnification?

PFMI: Q.11.4.3

AGC: 67a, 67b.

Yes

No

Not applicable

OTHER:

371 G11Q103

Please explain (then please answer 67c):

PFMI: Q.11.4.3
AGC: 67b.

372 G11Q104

Please provide details of the relevant sections of the contracts, rules or practices where this information is found

PFMI: Q.11.4.3
AGC: 67c.

373 G11Q105

Insurance

PFMI: Q.11.4.3
AGC: 67d.

Yes
 No
 Not applicable
 OTHER:

374 G11Q106

Please explain (then please answer 67f):

PFMI: Q.11.4.3
AGC: 67e.

ATHEX GROUP carries insurance coverage against a variety of potential threats including claims for errors, omissions malfeasance, etc, amounting to a total of about EUR € 110.538.500 € (electronic equipment coverage not included) .

375 G11Q107

Please provide details of the relevant sections of the contracts, rules or practices where this information is found

PFMI: Q.11.4.3
AGC: 67f.

ATHEX GROUP carries insurance coverage against a variety of potential threats including claims for errors, omissions malfeasance, etc, amounting to a total of about EUR € 110.538.500 € (electronic equipment coverage not included) . Specifically:

- 1.D&O Coverage is EUR 50,000,000 per case, aggregate per year, EUR 50,000 deductible per case.
- 2.Direct Financial Loss & Prof. Indemnity (DFL + PI COVERAGE): EUR 35,000,000 for DFL aggregate per year, EUR 200,000 deductible per case.
- 3.Premises Insurance: EUR 22.992.500. Deductible per case 10% of the covered capital for every damage, Political Risks and terrorists acts: 5% of the covered capital for every damage, Earthquake: 2% of the covered capital for every damage.
- 4.Civil Liability: (a) Against third party: EUR 2,000,000. Deductible per case €600. (b) Personnel: EUR 500,000. Deductible First 3 working days of the date / time of the accident (maximum liability € 4,500,000.00 for both a &b)
5. Cash transfers: a) EUR 6,000 loss of money during transfer b) EUR 40,000 i) loss of money as a result of theft - fund robbery (hold up) and ii) loss of the funds held in the security cabinet of our accounting division Deductible: € 0,00.

The above mentioned information may be found in the separate contracts with National Insurance SA, AIG EUROPE Insurance and INTERAMERICAN.

376 G11Q108

Acknowledgement of liability for losses caused by CSD's own actions.

PFMI: Q.11.4.3

AGC: 67g.

Yes [A01]

377 G11Q109

Please explain (then please answer 67i):

PFMI: Q.11.4.3

AGC: 67h.

Covered by the insurance mentioned above, under 374 and 375

378 G11Q110

Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

PFMI: Q.11.4.3

AGC: 67i.

The above mentioned information may be found in separate contracts with AIG, ETHNIKI Hellenic General Insurance Company S.A, Europe Insurance Co and Interamerican.

379 G11Q111

Other

PFMI: Q.11.4.3

AGC: 67j.

No [N]

380 G11Q112

Please explain (then please answer 67l):

PFMI: Q.11.4.3

AGC: 67k.

381 G11Q113

Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

PFMI: Q.11.4.3

AGC: 67l.

382 G11Q114

What segregation arrangements are in place at the CSD? How does the CSD ensure segregation between its own assets and the securities of its participants? How does the CSD ensure segregation among the securities of participants?

PFMI: Q.11.5.1
AGC: n/a

383 G11Q115
Are participants permitted to maintain more than one account at the CSD?

PFMI: Q.11.5.1
AGC: 41

Other: According to the provisions of Article 10 of the DSS Operation Regulation, participants may hold more than one account on the DSS system depending ONLY on the type of services they offer (e.g. ATHEX member, market maker on the cash or the derivatives market)

384 G11Q116
If yes, please indicate number:

PFMI: Q.11.5.1
AGC: 41a, 41c

- An unlimited number of accounts
- More than one account
- OTHER:

385 G11Q117
If more than one account what is the maximum?

PFMI: Q.11.5.1
AGC: 41b

386 G11Q118
Where supported by the legal framework, how does the CSD support the operational segregation of securities belonging to participants' customers from the participants' book? How does the CSD facilitate the transfer from these customers' accounts to another participant?

PFMI: Q.11.5.2
AGC: n/a

387 G11Q119
Are participants required/permitted to segregate assets held for their own benefit from those they hold for their clients?

PFMI: Q.11.5.2
AGC: 42

- Yes
- No
- Not applicable
- OTHER:

388 G11Q120
If yes, is segregation required or simply permitted?

PFMI: Q.11.5.2

AGC: 42a

Required [A01]

389 G11Q121
How does segregation occur?

PFMI: Q.11.5.2
AGC: 42b, 42c

- By separately designated participant accounts.
- By sub-accounts within a single participant account.
- By separately designated beneficial owner accounts.
- OTHER:

390 G11Q122
Does the CSD permit its participants to open accounts in the participant's own nominee name(s)?

PFMI: Q.11.5.2
AGC: 43, 43b

No [A02]

391 G11Q123
If yes, do laws exist, which define as well as protect the rights of beneficial owners with respect to securities registered in nominee name?

PFMI: Q.11.5.2
AGC: 43a

392 G11Q124
Does the CSD maintain records that identify the assets of each participant and segregate the system's own assets from the assets of participants?

PFMI: Q.11.5.2
AGC: 53, 53a

- Yes
- No
- Not applicable
- OTHER:

393 G11Q125
Does the CSD provide services other than central safekeeping and administration of securities and settlement? If so, what services?

PFMI: Q.11.6.1
AGC: n/a

394 G11Q126
Please indicate services you provide.

PFMI: Q.11.6.1
AGC: 35

Own list or: AGC: Information in advance on corporate (annual or special) meetings in order that owners can vote.
 Tax assistance where foreign holders may be entitled to tax relief at source or through a claim.
 In order to avoid fails, an automatic securities lending facility - if requested - is provided for.
 Collateral handling in support of activities including securities lending, overdraft coverage, cash management, repurchase agreements, etc.
 Same day turnaround settlements.
 Information on distribution of new issues (IPO, Privatization).
 Not applicable
 OTHER: A special borrowing/lending product is offered since Feb 2005. Following the unbundling of services as of 27 September 2010, the product is offered by ATHEXClear, a 100% owned ATHEX subsidiary established in 2010, which allows market participants among other uses to cover failed trades as well. The product is currently available to ATHEXClear members (clearing members) directly and other ATHEX members cooperating with an ATHEXClear member. Following MiFID implementation, bilateral lending facilities are also provided

395 G11Q127
Automatic securities lending facility is provided for:

PFMI: Q.11.6.1
AGC: 35a

Brokers
 Banks
 Other financial institutions
 OTHER:

396 G11Q128
If collateral handling, please provide details

PFMI: Q.11.6.1
AGC: 35c

Following the unbundling of services as of 27 September 2010, collateral is now managed, for credit risk reasons, by ATHEXClear, a 100% owned ATHEX subsidiary established in 2010, in its capacity as the administrator of the Clearing Fund.

397 G11Q129
Other, please explain:

PFMI: Q.11.6.1
AGC: 35d

Interest payments, debt instruments' capital reimbursement, corporate actions processing. Information services to issuers and investors are also provided.

398 G11Q130
What procedures are in place for the processing of corporate action entitlements?

PFMI: Q.11.6.1
AGC: 36

Credited to the securities account on the day indicated below regardless of whether actually collected by the CSD on the scheduled date.
 Credited to the securities account upon actual receipt by the CSD.
 Corporate action entitlements are handled by an entity separate from the CSD.
 Not applicable

OTHER:

399 G11Q131
Credited to the securities account:

PFMI: Q.11.6.1
AGC: 36a

- On pay date.
- On pay date +1.
- On pay date +2.
- OTHER:

400 G11Q132
Name of entity:

PFMI: Q.11.6.1
AGC: 36c

401 G11Q133
What procedures are in place for the processing of interest and dividends?

PFMI: Q.11.6.1
AGC: 37, 37d.

- Credited to the cash account on the day indicated below regardless of whether actually collected by the CSD on the scheduled date.
- Credited to the cash account upon actual receipt by the CSD.
- Income and dividend collection is handled by an entity separate from the CSD.
- Not applicable
- OTHER:

402 G11Q134
Credited to the cash account:

PFMI: Q.11.6.1
AGC: 37a

- On pay date.
- On pay date +1.
- On pay date +2.
- OTHER:

403 G11Q135
Name of entity:

PFMI: Q.11.6.1
AGC: 37c

Banks acting as paying agents appointed by the issuers.

404 G11Q136
If the CSD provides services other than central safekeeping and administration of securities and settlement, how does it identify the risks associated with those activities, including potential credit and

liquidity risks? How does it measure, monitor and manage these risks, including legally separating services other than safekeeping and administration of securities where necessary?

PFMI: Q.11.6.2
AGC: n/a

405 G11Q137
filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

Exchange-of-value settlement systems (PFMI Principle 12)

406 G12Q001
Summary narrative for PFMI Principle 12. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P12
AGC: n/a

407 G12Q002
How do the CSD's legal, contractual, technical and risk management frameworks ensure that the final settlement of relevant financial instruments eliminates principal risk? What procedures ensure that the final settlement of one obligation occurs if and only if the final settlement of a linked obligation also occurs?

PFMI: Q.12.1.1
AGC: n/a

408 G12Q003
Does the CSD guaranty settlement?

PFMI: Q.12.1.1
AGC: 66u.

No [A01]

409 G12Q004
Please explain how this is accomplished. What are the procedures and safeguards that permit the CSD to guaranty settlement?

PFMI: Q.12.1.1
AGC: 66v.

410 G12Q005

How are the linked obligations settled - on a gross basis (trade by trade) or on a net basis?

PFMI: Q.12.1.2

AGC: n/a

411 G12Q006

The Committee on Payment and Settlement Systems of the Bank for International Settlements (BIS) has identified three common structural approaches or models for linking delivery and payment in a securities settlement system. Please indicate which model your procedures most closely resemble.

PFMI: Q.12.1.2

AGC: 48

Model1

Model2

Model3

Not applicable

OTHER:

412 G12Q007

Please briefly describe your settlement process, including how do your settlement procedures vary from the model chosen above?

PFMI: Q.12.1.3

AGC: 48a

BIS Model 2 settlement for ATHEX regular trades - gross on securities at beneficiary account level - net on cash at participant cash account level. BIS Model 1 bilateral settlement for block trades executed through ATHEX, management of fail trades, etc and OTC Transactions - gross on securities at beneficiary account level - gross on cash on participant cash account level

413 G12Q008

Is the finality of settlement of linked obligations simultaneous?

PFMI: Q.12.1.3

AGC: n/a

414 G12Q009

If not, what is the timing of finality for both obligations? Is the length of time between the blocking and final settlement of both obligations minimised?

PFMI: Q.12.1.3

AGC: n/a

415 G12Q010

Are the cash and security movements simultaneous?

PFMI: Q.12.1.3

AGC: 49

Yes [A01]

416 G12Q011

If cash and security movements are not simultaneous, please indicate the duration of the timing gap

PFMI: Q.12.1.3

AGC: 49a

417 G12Q012

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Participant default rules and procedures (PFMI Principle 13)

418 G13Q001

Summary narrative for PFMI Principle 13. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P13

AGC: n/a

419 G13Q002

Do the CSD's rules and procedures clearly define an event of default (both a financial and an operational default of a participant) and the method for identifying a default? How are these events defined?

PFMI: Q.13.1.1

AGC: n/a

420 G13Q003

How do the CSD's rules and procedures address the following key aspects of a participant default: a) the actions that the CSD can take when a default is declared, b) the extent to which the actions are automatic or discretionary, c) changes to normal settlement practices, d) the management of transactions at different stages of processing, e) the expected treatment of proprietary and customer transactions and accounts, f) the probable sequencing of actions, g) the roles, obligations and responsibilities of the various parties, including non-defaulting participants, and h) the existence of other mechanisms that may be activated to contain the impact of a default?

PFMI: Q.13.1.2

AGC: n/a

421 G13Q004

During the past three years, has there been a situation where a participant defaulted which resulted in a significant loss?

PFMI: Q.13.1.2

AGC: 77

No [A02]

422 G13Q005

How was the situation resolved? Or if you answered "Other," then please explain:

PFMI: Q.13.1.2

AGC: 77a

423 G13Q006

Does the stock exchange have default protections that extend to the CSD, such as the following?

PFMI: Q.13.1.2

AGC: 80

- Margin requirements for stock exchange members
- Guaranty fund for stock exchange members
- Financial requirements for stock exchange membership
- No
- Not applicable
- OTHER:

424 G13Q007

Please explain:

PFMI: Q.13.1.2

AGC: 80a

425 G13Q008

How do the CSD's rules and procedures allow the CSD to promptly use any financial resources that it maintains for covering losses and containing liquidity pressures arising from default, including liquidity facilities?

PFMI: Q.13.1.3

AGC: n/a

426 G13Q009

How do the CSD's rules and procedures address the order in which the financial resources can be used?

PFMI: Q.13.1.4

AGC: n/a

427 G13Q010

Participant Default Protections Resulting from a Participant Failure. If a participant defaults, how is the loss covered? (Choose all that apply?)

PFMI: Q.13.1.4

AGC: 76, 76d

- CSD insurance covers the loss

The CSD guaranty fund covers the loss
 Loss is shared among participants
 Not applicable
 OTHER: ATHEXCSD do not provide clearing services. As a result, there is no counterparty risk for CSD participants. ATHEXClear, another member company of ATHEXGroup, is operating as CCP for trades executed in ATHEX. ATHEXClear is a qualified CCP according to EMIR since 2015.

428 G13Q011
Please explain the process:

PFMI: Q.13.1.4
AGC: 76a

429 G13Q012
Please explain the process of how the loss is shared:

PFMI: Q.13.1.4
AGC: 76b

430 G13Q013
Please explain:

PFMI: Q.13.1.4
AGC: 76d

431 G13Q014
How do the CSD's rules and procedures address the replenishment of resources following a default?

PFMI: Q.13.1.5
AGC: n/a

432 G13Q015
Does the CSD's management have internal plans that clearly delineate the roles and responsibilities for addressing a default? What are these plans?

PFMI: Q.13.2.1
AGC: n/a

433 G13Q016
What type of communication procedures does the CSD have in order to reach in a timely manner all relevant stakeholders, including regulators, supervisors and overseers?

PFMI: Q.13.2.2
AGC: n/a

434 G13Q017
How frequently are the internal plans to address a default reviewed? What is the governance arrangement around these plans?

PFMI: Q.13.2.3
AGC: n/a

435 G13Q018

How are the key aspects of the CSD's participant default rules and procedures made publicly available? How do they address: a) the circumstances in which action may be taken, b) who may take those actions, c) the scope of the actions which may be taken, including the treatment of both proprietary and customer positions, funds and assets, d) the mechanisms to address an CSD's obligations to non-defaulting participants, and e) where direct relationships exist with participants' customers, the mechanisms to help address the defaulting participant's obligations to its customers?

PFMI: Q.13.3.1
AGC: n/a

436 G13Q019

How does the CSD engage with its participants and other relevant stakeholders in the testing and review of its participant default procedures? How frequently does it conduct such tests and reviews? How are these tests results used? To what extent are the results shared with the board, risk committee and relevant authorities?

PFMI: Q.13.4.1
AGC: n/a

437 G13Q020

What range of potential participant default scenarios and procedures do these tests cover? To what extent does the CSD test the implementation of the resolution regime for its participants?

PFMI: Q.13.4.2
AGC: n/a

438 G13Q021

filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

General business risk (PFMI Principle 15)

439 G14Q001

Summary narrative for PFMI Principle 15. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P15
AGC: n/a

440 G14Q002

Is a financial audit performed by an Audit Firm, Regulatory Authority, or other external party?

PFMI: Q.17.2.3

AGC: 15

Yes [Y]

441 G14Q003

If yes, please state the name(s) of the entity(ies) who perform the financial audit.

PFMI: n/a

AGC: 15a.

PwC Greece is the financial auditor of ATHEXCSD for year 2018

442 G14Q004

Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party:

PFMI: n/a

AGC: 15b.

03/07/2018

443 G14Q005

Please list the period that the audit covered:

PFMI: n/a

AGC: 15c.

Start date: 01/01/2018

End date: 30/06/2018

444 G14Q006

How frequently does the financial audit occur?

PFMI: n/a

AGC: 15d.

Two or more times a year [A01]

445 G14Q007

If less than annually, please explain:

PFMI: n/a

AGC: 15e.

446 G14Q008

Please select the statement that most accurately characterizes the results of the last financial audit:

PFMI: n/a

AGC: 15g.

No material exceptions found. [A01]

447 G14Q009

If minor or material exceptions were found, what actions were taken? Please describe:

PFMI: n/a

AGC: 15h.

448 G14Q010

Has there been any material loss by the CSD during the past three years?

PFMI: n/a

AGC: 86

No [A02]

449 G14Q011

If there has been a loss, please describe the cause, the final impact and the action taken to prevent a recurrence:

PFMI: n/a

AGC: 86a.

450 G14Q012

Has the CSD been subject to any litigation involving a participant during the past three years?

PFMI: n/a

AGC: 87

No [A02]

451 G14Q013

Please explain the circumstances and resolution:

PFMI: n/a

AGC: 87a.

452 G14Q014

Has the CSD realized revenues sufficient to cover expenses during the past three years?

PFMI: n/a

AGC: 88, 88a

Yes for all three years [A01]

453 G14Q015

Has any participant suffered any losses in the past three years due to the CSD's performance?

PFMI: n/a

AGC: 30, 30m

No [A02]

454 G14Q016

If yes, please select all of the following in which loss has occurred. You will be prompted to enter the number of instances and total loss in USD thereafter.

PFMI: n/a

AGC: 30a, 30j

- Corporate Action
- Settlement Process - Securities
- Settlement Process - Cash
- System Outage
- OTHER:

455 G14Q017

Corporate Action. Please specify number of instances:

PFMI: n/a

AGC: 30b.

456 G14Q018

Corporate Action. Please specify total loss in USD:

PFMI: n/a

AGC: 30c.

457 G14Q019

Settlement Process - Securities. Please specify number of instances:

PFMI: n/a

AGC: 30d.

458 G14Q020

Settlement Process - Securities. Please specify total loss in USD:

PFMI: n/a

AGC: 30e.

459 G14Q021

Settlement Process - Cash. Please specify number of instances:

PFMI: n/a

AGC: 30f.

460 G14Q022

Settlement Process - Cash. Please specify total loss in USD:

PFMI: n/a
AGC: 30g.

461 G14Q023
System Outage. Please specify number of instances:

PFMI: n/a
AGC: 30h.

462 G14Q024
System Outage. Please specify total loss in USD:

PFMI: n/a
AGC: 30i.

463 G14Q025
For Other, please specify number of instances:

PFMI: n/a
AGC: 30k.

464 G14Q026
For Other, please specify total loss in USD:

PFMI: n/a
AGC: 30l.

465 G14Q027
How does the CSD identify its general business risks? What general business risks has the CSD identified?

PFMI: Q.15.1.1
AGC: n/a

466 G14Q028
How does the CSD monitor and manage its general business risks on an ongoing basis? Does the CSD's business risk assessment consider the potential effects on its cash flow and (in the case of a privately operated CSD) capital?

PFMI: Q.15.1.2
AGC: n/a

467 G14Q029
Does the CSD hold liquid net assets funded by equity so that it can continue operations and services as a going concern if it incurs general business losses?

PFMI: Q.15.2.1

AGC: n/a

468 G14Q030

Does the CSD maintain a reserve for operating losses?

PFMI: Q.15.2.1

AGC: 89, 89b

Other: According to the financial data until 30/06/2018, ATHEXCSD has formed reserves of EUR 9.5 million

469 G14Q031

How does the CSD calculate the amount of liquid net assets funded by equity to cover its general business risks?

PFMI: Q.15.2.2

AGC: n/a

470 G14Q032

How does the CSD determine the length of time and associated operating costs of achieving a recovery or orderly wind-down of critical operations and services?

PFMI: Q.15.2.2

AGC: n/a

471 G14Q033

Please describe and indicate reserve (for operating losses) amount:

PFMI: Q.15.2.2

AGC: 89a.

472 G14Q034

Has the CSD developed a plan to achieve a recovery or orderly wind-down, as appropriate?

PFMI: Q.15.3.1a

AGC: n/a

473 G14Q035

If yes, what does this plan take into consideration (for example, the operational, technological and legal requirements for participants to establish and move to an alternative arrangement)?

PFMI: Q.15.3.1b

AGC: n/a

474 G14Q036

What amount of liquid net assets funded by equity is the CSD holding for purposes of implementing this plan? How does the CSD determine whether this amount is sufficient for such implementation? Is this amount at a minimum equal to six months of the CSD's current operating expenses?

PFMI: Q.15.3.2
AGC: n/a

475 G14Q037

How are the resources designated to cover business risks and losses separated from resources designated to cover participant defaults or other risks covered under the financial resources principles?

PFMI: Q.15.3.3
AGC: n/a

476 G14Q038

Does the CSD include equity held under international risk-based capital standards to cover general business risks?

PFMI: Q.15.3.4
AGC: n/a

477 G14Q039

What is the composition of the CSD's liquid net assets funded by equity? How will the CSD convert these assets as needed into cash at little or no loss of value in adverse market conditions?

PFMI: Q.15.4.1
AGC: n/a

478 G14Q040

How does the CSD regularly assess the quality and liquidity of its liquid net assets funded by equity to meet its current and projected operating expenses under a range of scenarios, including in adverse market conditions?

PFMI: Q.15.4.2
AGC: n/a

479 G14Q041

Has the CSD developed a plan to raise additional equity? What are the main features of the CSD's plan to raise additional equity should its equity fall close to or fall below the amount needed?

PFMI: Q.15.5.1
AGC: n/a

480 G14Q042

How frequently is the plan to raise additional equity reviewed and updated?

PFMI: Q.15.5.2
AGC: n/a

481 G14Q043

What is the role of the CSD's board (or equivalent) in reviewing and approving the CSD's plan to raise additional equity if needed?

PFMI: Q.15.5.3

AGC: n/a

482 G14Q044

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Custody risk (PFMI Principle 16)

483 G15Q001

Summary narrative for PFMI Principle 16. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P16

AGC: n/a

484 G15Q002

If the CSD uses custodians, how does the CSD select its custodians? What are the specific selection criteria the CSD uses, including supervision and regulation of these entities? How does the CSD monitor the custodians' adherence to these criteria?

PFMI: Q.16.1.1

AGC: n/a

485 G15Q003

Are there any activities performed by a third party on behalf of the CSD for the CSD participants (e.g., vaulting of physical securities, registration, entitlement processing, etc.)?

PFMI: Q.16.1.1

AGC: 29, 29i

Yes
 No
 Not applicable
 OTHER:

486 G15Q004

If third parties are employed, please indicate which services they supply:

PFMI: Q.16.1.1

AGC: 29a.

487 G15Q005

If third parties are employed, does the CSD assume liability for losses incurred by participants as a result of the actions/inactions of the third parties?

PFMI: Q.16.1.1

AGC: 29b.

488 G15Q006

If you acknowledge responsibility, please indicate whether your responsibility is assumed

PFMI: Q.16.1.1

AGC: 29c, 29e.

- regardless of whether such loss was caused by any action or inaction of the agent
- if such loss was caused by the agent's action or inaction and such action or inaction was deemed to be negligence on the part of the agent
- if such loss was caused by the agent's action or inaction and such action or inaction was deemed to be gross negligence on the part of the agent
- if the loss was caused by the willful default or other willful conduct on the part of the agent
- OTHER:

489 G15Q007

If you acknowledge responsibility for agents, your responsibility is assumed for losses

PFMI: Q.16.1.1

AGC: 29d, 29h.

- without limit
- which are not consequential losses
- subject to a monetary limit not based on insurance limits
- subject to a monetary limit based on insurance limits
- OTHER:

490 G15Q008

Please specify limit:

PFMI: Q.16.1.1

AGC: 29f.

491 G15Q009

Please specify limit:

PFMI: Q.16.1.1

AGC: 29g.

492 G15Q010

How does the CSD verify that these entities have robust accounting practices, safekeeping procedures, and internal controls that fully protect its and its participants' assets?

PFMI: Q.16.1.2

AGC: n/a

493 G15Q011

How has the CSD established that it has a sound legal basis to support enforcement of its interest or ownership rights in assets held in custody?

PFMI: Q.16.2.1

AGC: n/a

494 G15Q012

How does the CSD ensure that it has prompt access to its assets, including securities that are held with a custodian in another time zone or legal jurisdiction, in the event of participant default?

PFMI: Q.16.2.2

AGC: n/a

495 G15Q013

How does the CSD evaluate and understand its exposures to its custodian banks? In managing those exposures, how does it take into account the full scope of its relationship with each custodian bank? For instance, does the CSD use multiple custodians for the safekeeping of its assets to diversify exposure to any single custodian? How does the CSD monitor concentration of risk exposures to its custodian banks?

PFMI: Q.16.3.1

AGC: n/a

496 G15Q014

Please describe briefly the arrangements / procedures / facilities you maintain to ensure that eligible securities held at the CSD are handled at least as efficiently as compared to securities held outside the CSD, particularly in relation to income, corporate actions and proxy services.

PFMI: Q.16.3.1

AGC: 62

Securities belonging to an issue that is listed on ATHEX and lodged to the depository cannot be kept outside the depository.

497 G15Q015

How does the CSD ensure that its investment strategy is consistent with its overall risk management strategy?

PFMI: Q.16.4.1a

AGC: n/a

498 G15Q016

How and to whom does the CSD disclose its investment strategy?

PFMI: Q.16.4.1b

AGC: n/a

499 G15Q017
How does the CSD ensure on an ongoing basis that its investments are secured by, or are claims on, high-quality obligors?

PFMI: Q.16.4.2
AGC: n/a

500 G15Q018
How does the CSD consider its overall exposure to an obligor in choosing investments? What investments are subject to limits to avoid concentration of credit risk exposures?

PFMI: Q.16.4.3
AGC: n/a

501 G15Q019
Does the CSD invest participant assets in the participants' own securities or those of its affiliates?

PFMI: Q.16.4.4
AGC: n/a

502 G15Q020
How does the CSD ensure that its investments allow for quick liquidation with little, if any, adverse price effect?

PFMI: Q.16.4.5
AGC: n/a

503 G15Q021
filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

Operational risk (PFMI Principle 17)

504 G16Q001
Summary narrative for PFMI Principle 17. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P17
AGC: n/a

505 G16Q002
What are the CSD's policies and processes for identifying the plausible sources of operational risks?

How do the CSD's processes identify plausible sources of operational risks, whether these risks arise from internal sources (for example, the arrangements of the system itself, including human resources), from the CSD's participants or from external sources?

PFMI: Q.17.1.1
AGC: n/a

506 G16Q003

What sources of operational risks has the CSD identified? What single points of failure in its operations has the CSD identified?

PFMI: Q.17.1.2
AGC: n/a

507 G16Q004

How does the CSD monitor and manage the identified operational risks? Where are these systems, policies, procedures and controls documented?

PFMI: Q.17.1.3
AGC: n/a

508 G16Q005

What policies, processes and controls does the CSD employ that are designed to ensure that operational procedures are implemented appropriately? To what extent do the CSD's systems, policies, processes and controls take into consideration relevant international, national and industry-level operational risk management standards?

PFMI: Q.17.1.4
AGC: n/a

509 G16Q006

What are the CSD's human resources policies to hire, train and retain qualified personnel, and how do such policies mitigate the effects of high rates of personnel turnover or key-person risk? How do the CSD's human resources and risk management policies address fraud prevention?

PFMI: Q.17.1.5
AGC: n/a

510 G16Q007

How do the CSD's change management and project management policies and processes mitigate the risks that changes and major projects inadvertently affect the smooth functioning of the system?

PFMI: Q.17.1.6
AGC: n/a

511 G16Q008

How has the board of directors defined the key roles and responsibilities for operational risk management?

PFMI: Q.17.2.1

AGC: n/a

512 G16Q009

Does the CSD's board explicitly review and endorse the CSD's operational risk management framework? How frequently does the board review and endorse the CSD's operational risk management framework?

PFMI: Q.17.2.2

AGC: n/a

513 G16Q010

How does the CSD review, audit and test its systems, policies, procedures and controls, including its operational risk management arrangements with participants? How frequently does the CSD conduct these reviews, audits and tests with participants?

PFMI: Q.17.2.3

AGC: n/a

514 G16Q011

Internal Audit. Is an internal audit undertaken in your CSD?

PFMI: Q.17.2.3

AGC: 14

Yes [Y]

515 G16Q012

If yes, what areas does the audit cover (financials, operations, etc.) and which department in your CSD handles it?

PFMI: Q.17.2.3

AGC: 14a.

Internal Audit in ATHEXCSD covers all aspects of the company namely financials and operations. The Internal Audit is conducted by the Internal Audit Division.

516 G16Q013

Please list the date of your last internal audit and the period that the audit covered:

PFMI: Q.17.2.3

AGC: 14b.

Start date: 01/09/2016

End date: 01/09/2017

Audit date: 25/09/2017

517 G16Q014

How frequently does the internal audit occur?

PFMI: Q.17.2.3

AGC: 14c.

Annually [A02]

518 G16Q015
If less than annually, please explain:

PFMI: Q.17.2.3
AGC: 14d.

519 G16Q016
Are the results of the internal audit publicly available?

PFMI: Q.17.2.3
AGC: 14e.

No [N]

520 G16Q017
Please select the statement that most accurately characterizes the results of the last internal audit:

PFMI: Q.17.2.3
AGC: 14f.

No material exceptions found. [A01]

521 G16Q018
If minor or material exceptions were found, what actions were taken? Please describe:

PFMI: Q.17.2.3
AGC: 14g.

522 G16Q019
To what extent, where relevant, is the CSD's operational risk management framework subject to external audit?

PFMI: Q.17.2.4
AGC: n/a

523 G16Q020
Is an operational audit performed by an Audit Firm, Regulatory Authority, or other external party?

PFMI: Q.17.2.4
AGC: 16

Yes [Y]

524 G16Q021
If yes, please state the name(s) of the entity(ies) who perform the operational audit.

PFMI: Q.17.2.4
AGC: 16a.

In 2018, an IT audit was performed by E&Y S.A. in collaboration with the Internal Audit Division.

525 G16Q022

Please list the date of your last operational audit performed by an Audit Firm, Regulatory Authority, or other external party:

PFMI: Q.17.2.4

AGC: 16b.

18/07/2018

526 G16Q023

Please list the period that the audit covered:

PFMI: Q.17.2.4

AGC: 16c.

Start date: 01/01/2017

End date: 31/12/2017

527 G16Q024

How frequently does the operational audit occur?

PFMI: Q.17.2.4

AGC: 16d.

Less than annually [A03]

528 G16Q025

If less than annually, please explain:

PFMI: Q.17.2.4

AGC: 16e.

On an ad hoc basis.

During ATHEXClear's annual IT audit, ATHEXCSD's systems are also audited.

529 G16Q026

Please select the statement that most accurately characterizes the results of the last operational audit:

PFMI: Q.17.2.4

AGC: 16g.

No material exceptions found. [A01]

530 G16Q027

If minor or material exceptions were found, what actions were taken? Please describe:

PFMI: Q.17.2.4

AGC: 16h.

531 G16Q028

What are the CSD's operational reliability objectives, both qualitative and quantitative? Where and how are they documented?

PFMI: Q.17.3.1

AGC: n/a

532 G16Q029

How do these objectives ensure a high degree of operational reliability?

PFMI: Q.17.3.2

AGC: n/a

533 G16Q030

What are the policies in place that are designed to achieve the CSD's operational reliability objectives to ensure that the CSD takes appropriate action as needed?

PFMI: Q.17.3.3

AGC: n/a

534 G16Q031

How does the CSD review, audit and test the scalability and adequacy of its capacity to handle, at a minimum, projected stress volumes? How frequently does the CSD conduct these reviews, audits and tests?

PFMI: Q.17.4.1

AGC: n/a

535 G16Q032

How are situations where operational capacity is neared or exceeded addressed?

PFMI: Q.17.4.2

AGC: n/a

536 G16Q033

What are the CSD's policies and processes, including change management and project management policies and processes, for addressing the plausible sources of physical vulnerabilities and threats on an ongoing basis?

PFMI: Q.17.5.1

AGC: n/a

537 G16Q034

How is access to the physical building controlled?

PFMI: Q.17.5.1

AGC: 74

By guards
 By electronic keys
 personal ID card
 By alarm system
 OTHER: There is also a CCTV network allowing surveillance and control of access to the premises. A hydraulic road block to absorb the impact in case of unauthorized entrance has been installed in the entrance of the building's parking lot and a fortified concrete wall has been built to protect the building from eventual attempts of that kind. In addition, people and equipment physically accessing the building have to go through scanning machines.

538 G16Q035
Please explain:

PFMI: Q.17.5.1
AGC: 74a.

539 G16Q036
Do the CSD's policies, processes, controls and testing appropriately take into consideration relevant international, national and industry-level standards for physical security?

PFMI: Q.17.5.2
AGC: n/a

540 G16Q037
What are the CSD's policies and processes, including change management and project management policies and processes, for addressing the plausible sources of information security vulnerabilities and threats on an ongoing basis?

PFMI: Q.17.5.3
AGC: n/a

541 G16Q038
Regarding data security: Are passwords used by participants to access their accounts?

PFMI: Q.17.5.3
AGC: 71 71a.

Yes [A01]

542 G16Q039
Does each user have a unique user ID?

PFMI: Q.17.5.3
AGC: 71c.

Yes [A01]

543 G16Q040

Are passwords regularly changed?

PFMI: Q.17.5.3
AGC: 71e.

Yes [A01]

544 G16Q041
How often?

PFMI: Q.17.5.3
AGC: 71f.

At users' initiative but at least once per 90 days

545 G16Q042

Is there a user lock-out after a pre-set number of unsuccessful User ID attempts?

PFMI: Q.17.5.3
AGC: 71h.

Yes [A01]

546 G16Q043
How many?

PFMI: Q.17.5.3
AGC: 71i.

3

547 G16Q044

Do the CSD's policies, processes, controls and testing appropriately take into consideration relevant international, national and industry-level standards for information security?

PFMI: Q.17.5.4
AGC: n/a

548 G16Q045

How and to what extent does the CSD's business continuity plan reflect objectives, policies and procedures that allow for the rapid recovery and timely resumption of critical operations following a wide-scale or major disruption?

PFMI: Q.17.6.1
AGC: n/a

549 G16Q046

How and to what extent is the CSD's business continuity plan designed to enable critical IT systems to resume operations within two hours following disruptive events, and to enable the CSD to facilitate or complete settlement by the end of the day even in extreme circumstances?

PFMI: Q.17.6.2
AGC: n/a

550 G16Q047
How quickly can the main system be reactivated in the event of an outage?

PFMI: Q.17.6.2
AGC: 82

1 - 4 hours [A01]

551 G16Q048
How is the contingency plan designed to ensure that the status of all transactions can be identified in a timely manner, at the time of the disruption, and if there is a possibility of data loss, what are the procedures to deal with such loss (for example, reconciliation with participants or third parties)?

PFMI: Q.17.6.3
AGC: n/a

552 G16Q049
How do the CSD's crisis management procedures address the need for effective communications internally and with key external stakeholders and authorities?

PFMI: Q.17.6.4
AGC: n/a

553 G16Q050
Will the CSD publicly announce any system interruption?

PFMI: Q.17.6.4
AGC: 84

Yes [A01]

554 G16Q051
To whom will the CSD disclose any system interruptions?

PFMI: Q.17.6.4
AGC: 84a.

- To the CSD regulators
- To all direct participants
- To direct and indirect participants
- To the public via the internet
- In the press
- OTHER:

555 G16Q052
If so, please list webpage address:

PFMI: Q.17.6.4

AGC: 84b.

<http://www.athexgroup.gr>

556 G16Q053

If so, please list all publications:

PFMI: Q.17.6.4

AGC: 84c.

557 G16Q054

Please explain:

PFMI: Q.17.6.4

AGC: 84d.

558 G16Q055

How will the CSD disclose any system interruptions?

PFMI: Q.17.6.4

AGC: 84e.

- By e-mail
- By telephone
- Public announcement
- Press release
- OTHER: Fax

559 G16Q056

Please explain:

PFMI: Q.17.6.4

AGC: 84f.

560 G16Q057

How does the CSD's business continuity plan incorporate the use of a secondary site (including ensuring that the secondary site has sufficient resources, capabilities, functionalities and appropriate staffing arrangements)? To what extent is the secondary site located a sufficient geographic distance from the primary site such that it has a distinct risk profile?

PFMI: Q.17.6.5

AGC: n/a

561 G16Q058

If a back-up system exists, how quickly can the back-up system be activated in the event of the main system failing?

PFMI: Q.17.6.5

AGC: 83

1 - 4 hours [A01]

562 G16Q059

Has the CSD considered alternative arrangements (such as manual, paper-based procedures or other alternatives) to allow the processing of time-critical transactions in extreme circumstances?

PFMI: Q.17.6.6

AGC: n/a

563 G16Q060

How are the CSD's business continuity and contingency arrangements reviewed and tested, including with respect to scenarios related to wide-scale and major disruptions? How frequently are these arrangements reviewed and tested?

PFMI: Q.17.6.7

AGC: n/a

564 G16Q061

How does the review and testing of the CSD's business continuity and contingency arrangements involve the CSD's participants, critical service providers and linked CSD? as relevant? How frequently are the CSD's participants, critical service providers and linked CSD? involved in the review and testing?

PFMI: Q.17.6.8

AGC: n/a

565 G16Q062

BUSINESS RECOVERY PLAN. This section is intended to identify key aspects of the CSD's Business Recovery Plan (BRP), including testing requirements and past results, expected recovery time periods, and the independent review and validation (if any) of the BRP. Do you have a formal business recovery plan?

PFMI: Q.17.6.8

AGC: 81

Yes [Y]

566 G16Q063

Does your Business Recovery Plan include:

PFMI: Q.17.6.8

AGC: 81a, 81h.

Back-up of all computer files

Off-site data storage

Back-up files stored and locked

Off-site operations facility

OTHER: The business continuity plan is based on timely followed procedures and high availability configuration of equipment that have been set to practice since 1999. The high availability of the services provided to market participants is ensured by the proper design of the mission critical IT systems and the networking infrastructure (ATHEXnet) in high availability configuration (main + standby systems) in two different datacenters (primary / secondary site) in Athens. The aim of the aforementioned design is to be able to resume operations after a device failure using the redundant equipment in a maximum time of two (2) hours following service interruption. According to internal

procedures the status of high availability configuration of IT systems and ATHEXnet are constantly checked every day in the primary and secondary site. ATHEX completed a study of the establishment of a new Disaster Recovery Center and Business Continuity Plan and selected the place and provider of venue for the new DRS and Business Continuity procedures. The new site is located about 40km away from Athens in a different earthquake and flood zone, with the capability to host adequate personnel to perform key operations for the period of time required to recover the main building and data centers from the disastrous incident. Implementation and testing activities have been completed. ATHEXGroup performed a successful BC test including the use of the new DR site, with Member participation, on June 30th 2018. During June 2014 ATHEXGroup had their Business Continuity Management System accredited with ISO22301:2012 for all the companies of the group and the offered products and services.

567 G16Q064

Please identify both the frequency and the last date of testing for the following third party: CSD participants/members

PFMI: Q.17.6.8

AGC: 81b.

Complying with internal procedures, the requirement for the high availability configuration of IT systems and ATHEXnet are constantly checked every day in both the primary and secondary site.

568 G16Q065

Please identify both the frequency and the last date of testing for the following third party: Stock exchange

PFMI: Q.17.6.8

AGC: 81c.

Not applicable

569 G16Q066

Please identify both the frequency and the last date of testing for the following third party: Central bank

PFMI: Q.17.6.8

AGC: 81d.

Not applicable

570 G16Q067

Please identify both the frequency and the last date of testing for the following third party: Local brokers

PFMI: Q.17.6.8

AGC: 81e.

Complying with internal procedures, the requirement for the high availability configuration of IT systems and ATHEXnet are constantly monitored daily in both the primary and the secondary site.

Last date of testing with Member participation was, on June 30th 2018.

571 G16Q068

Please identify both the frequency and the last date of testing for the following third party: Any other third party

PFMI: Q.17.6.8
AGC: 81f.

Not applicable

572 G16Q069
In the past three years, has it been necessary to activate the recovery plan in a live situation?

PFMI: Q.17.6.8
AGC: 85

No [A02]

573 G16Q070
If yes, how much time was needed to implement the recovery plan?

PFMI: Q.17.6.8
AGC: 85a.

574 G16Q071
How much time was needed to recover and restore business to normal operations?

PFMI: Q.17.6.8
AGC: 85b.

575 G16Q072
What was the impact to the market?

PFMI: Q.17.6.8
AGC: 85c, 85d.

- All securities settlements took place as scheduled on the same day with good value
- All cash settlements took place as scheduled on the same day with good value
- All securities settlements took place one business day late with good value
- All cash settlements took place one business day late with good value
- All securities settlements took place one business day late with value one day late
- All cash settlements took place one business day late with value one day late
- All securities settlements took place more than one business day late
- All cash settlements took place more than one business day late
- As a result of the system failure, all fines and penalties for late settlements were waived
- Even though there was a system failure, all fines and penalties for late settlements were still assessed
- OTHER:

576 G16Q073
If no or other, please explain

PFMI: Q.17.7.4
AGC: 40a.

577 G16Q074
What risks has the CSD identified to its operations arising from its key participants, other CSD, and

service and utility providers? How and to what extent does the CSD monitor and manage these risks?

PFMI: Q.17.7.1
AGC: n/a

578 G16Q075

Are procedures and controls (firewalls) in place to avoid systemic collapse or contamination if one of the linked entities should experience business interruptions for whatever reason?

PFMI: Q.17.7.1
AGC: 39

- Yes
- No
- Not applicable

579 G16Q076

Please explain

PFMI: Q.17.7.1
AGC: 39a

The communications and operations of the "links" are run by ATHEX's IT Division. Alternative methods of communication are provided; back-up procedures too.

580 G16Q077

If the CSD has outsourced services critical to its operations, how and to what extent does the CSD ensure that the operations of a critical service provider meet the same reliability and contingency requirements they would need to meet if they were provided internally?

PFMI: Q.17.7.2
AGC: n/a

581 G16Q078

How and to what extent does the CSD identify, monitor and mitigate the risks it may pose to another FMI?

PFMI: Q.17.7.3
AGC: n/a

582 G16Q079

To what extent does the CSD coordinate its business continuity arrangements with those of other interdependent CSDs?

PFMI: Q.17.7.4
AGC: n/a

583 G16Q080

Has a business interruption recovery plan been developed in the event the linkages should become inoperable for any reason?

PFMI: Q.17.7.4

AGC: 40

Yes [A01]

584 G16Q081

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Access and participation requirements (PFMI Principle 18)

585 G17Q001

Summary narrative for PFMI Principle 18. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P18

AGC: n/a

586 G17Q002

What are the CSD's criteria and requirements for participation (such as operational, financial and legal requirements)?

PFMI: Q.18.1.1

AGC: n/a

587 G17Q003

Are prospective participants subject to an initial review and approval process regarding compliance with eligibility requirements?

PFMI: Q.18.1.1

AGC: 19

Other: As far as participation of a Bank or a Broker to ATHEXCSD is concerned, no approval process exists. Bank participants are licensed by the Bank of Greece (as Credit Institutions) and Brokers by the Hellenic Capital Market Commission (as Investment Services Firms), prior to their participation in ATHEXCSD 's Dematerialised Securities System. Foreign Central Securities Depositories must be supervised according to the legal framework that governs them, have established links with ATHEXCSD and concluded the agreements provided by the Dematerialized Securities System Operation Regulation

588 G17Q004

How do these criteria and requirements allow for fair and open access to the CSD's services, including by direct and, where relevant, indirect participants and other CSD?, based on reasonable risk-related participation requirements?

PFMI: Q.18.1.2
AGC: n/a

589 G17Q005

How are the participation requirements for the CSD justified in terms of the safety and efficiency of the CSD and its role in the markets it serves, and tailored to and commensurate with the CSD's specific risks?

PFMI: Q.18.2.1
AGC: n/a

590 G17Q006

Are there participation requirements that are not risk-based but required by law or regulation? If so, what are these requirements?

PFMI: Q.18.2.2
AGC: n/a

591 G17Q007

What governs the relationship between the CSD and the participants?

PFMI: Q.18.2.2
AGC: 20

- Relevant law and regulation
- Standard participation contract
- Established terms and conditions of participation
- By-laws of the CSD
- Rules of the CSD
- Not applicable
- OTHER: Decisions no 2 and 4 of ATHEXCSD BoD "Standard participation agreement" referring to the access to and use of ATHEXCSD's Dematerialized Securities System

592 G17Q008

Please explain:

PFMI: Q.18.2.2
AGC: 20a

593 G17Q009

Are all classes of participants subject to the same access criteria? If not, what is the rationale for the different criteria (for example, size or type of activity, additional requirements for participants that act on behalf of third parties, and additional requirements for participants that are non-regulated entities)?

PFMI: Q.18.2.3
AGC: n/a

594 G17Q010

PARTICIPANTS AND PARTICIPATION. The purpose of this section is to understand issues relating to participation in the CSD, including eligibility requirements, conditions of participation, and supervision of

participants. What types of entities are eligible to become participants and how many of each type are there currently?

PFMI: Q.18.2.3
AGC: 17, 17q

- Banks
- Brokers
- Individuals
- Foreign Institutions
- Not applicable
- OTHER: ATHEXClear SA acting as Securities and Derivatives Clearing House & CCP. Bank of Greece and foreign Central Securities Depositories are also eligible

595 G17Q011
How many Bank participants are there currently? (then please answer 17b)

PFMI: Q.18.2.3
AGC: 17a.

16 Banks, either local or remote, participate in the DSS as custodians

596 G17Q012
Please select the features included in the eligibility requirements for Banks.

PFMI: Q.18.2.3
AGC: 17b, 17d

- Financial Thresholds
- Regulatory Oversight
- Market Experience
- OTHER: Article 1, Dematerialized Securities System (DSS) Operation Regulation (published in our website)

597 G17Q013
Please explain:

PFMI: Q.18.2.3
AGC: 17d.

598 G17Q014
How many Broker participants are there currently? (then please answer 17f)

PFMI: Q.18.2.3
AGC: 17e.

40 brokers – members of ATHEX, either local or remote

599 G17Q015
Please select the features included in the eligibility requirements for Brokers.

PFMI: Q.18.2.3
AGC: 17f, 17h

- Financial Thresholds
- Regulatory Oversight
- Market Experience
- OTHER: Article 1, Dematerialized Securities System (DSS) Operation Regulation (published in our

website)

600 G17Q016

How many Individual participants are there currently? (then please answer 17j)

PFMI: Q.18.2.3

AGC: 17i.

601 G17Q017

Please select the features included in the eligibility requirements for Individual participants.

PFMI: Q.18.2.3

AGC: 17j.

- Financial Thresholds
- Regulatory Oversight
- Market Experience
- OTHER:

602 G17Q018

How many Foreign Institution participants are there currently?

PFMI: Q.18.2.3

AGC: 17m.

14 remote participants (Foreign Institutions), either Banks or Brokers

603 G17Q019

Please select the features included in the eligibility requirements for Foreign Institution participants.

PFMI: Q.18.2.3

AGC: 17n, 17p.

- Financial Thresholds
- Regulatory Oversight
- Market Experience
- OTHER: Article 1, Dematerialized Securities System (DSS) Operation Regulation In addition, for EU resident Foreign Institutions, the EU passport is applicable; the Home Country competent authority is required to notify the Hellenic Capital Market Commission. For non-EU Foreign participants, the Hellenic Capital Market Commission is required to issue an authorization

604 G17Q020

If you have selected "Other entities" above, please explain:

PFMI: Q.18.2.3

AGC: 17q.

605 G17Q021

Indicate how many "Other entities" are currently participants?

PFMI: Q.18.2.3

AGC: 17r.

2

606 G17Q022

Please select the features included in the eligibility requirements for the participants referred to above as "Other entities".

PFMI: Q.18.2.3

AGC: 17s, 17u

Financial Thresholds

Regulatory Oversight

Market Experience

OTHER: Dematerialized Securities System Operations Regulation, articles 1 & 11

607 G17Q023

How are the access restrictions and requirements reviewed to ensure that they have the least restrictive access that circumstances permit, consistent with maintaining acceptable risk controls? How frequently is this review conducted?

PFMI: Q.18.2.4

AGC: n/a

608 G17Q024

How are participation criteria, including restrictions in participation, publicly disclosed?

PFMI: Q.18.2.5

AGC: n/a

609 G17Q025

Where can a description of the specific eligibility requirements for Bank participants be found?

PFMI: Q.18.2.5

AGC: 17c.

610 G17Q026

Where can a description of the specific eligibility requirements for Broker participants be found?

PFMI: Q.18.2.5

AGC: 17g.

611 G17Q027

Where can a description of the specific eligibility requirements for Individual participants be found?

PFMI: Q.18.2.5

AGC: 17k.

612 G17Q028

Where can a description of the specific eligibility requirements for Foreign Institution participants be found?

PFMI: Q.18.2.5
AGC: 17o.

613 G17Q029
Where can a description of the specific eligibility requirements for participants described above as "Other entities" be found?

PFMI: Q.18.2.5
AGC: 17f.

614 G17Q030
How does the CSD notify participants of material changes to the conditions of participation?

PFMI: Q.18.2.5
AGC: 22

- By e-mail
- By telephone
- By public announcement
- By press release
- Not applicable
- OTHER: All changes in the Rules and Regulations of ATHEXCSD are published in the Government Gazette of the Greek State

615 G17Q031
Please explain:

PFMI: Q.18.2.5
AGC: 22a.

616 G17Q032
How does the CSD monitor its participants' ongoing compliance with the access criteria? How are the CSD's policies designed to ensure that the information it uses to monitor compliance with participation criteria is timely and accurate?

PFMI: Q.18.3.1
AGC: n/a

617 G17Q033
Who enforces compliance with the CSD's conditions of participation?

PFMI: Q.18.3.1
AGC: 23

- The CSD
- The exchange
- The CSD's regulator
- Not applicable
- OTHER:

618 G17Q034
Please explain:

PFMI: Q.18.3.1
AGC: 23a

619 G17Q035
Does the CSD have forms of oversight management for assessing and monitoring of the following?

PFMI: Q.18.3.1
AGC: 79

- Participant eligibility requirements
- Participant volumes
- Participant financial strength
- Other loss or default protections the CSD maintains
- Collateral requirements for participants
- Debit caps for participants
- Settlement controls that minimize or eliminate the risk of default by a participant
- Blocking of securities movement before receipt of payment
- Blocking payment until securities are moved
- Not applicable
- OTHER:

620 G17Q036
Please explain other loss or default protections:

PFMI: Q.18.3.1
AGC: 79a

621 G17Q037
Please explain the requirements:

PFMI: Q.18.3.1
AGC: 79b

622 G17Q038
Please explain how these debit caps work:

PFMI: Q.18.3.1
AGC: 79c

623 G17Q039
What type or types of settlement controls

PFMI: Q.18.3.1
AGC: 79d.

- Blocking or freezing of securities positions
- Controlling DVP settlement
- Simultaneous DVP
- OTHER:

624 G17Q040

Please explain:

PFMI: Q.18.3.1
AGC: 79e.

625 G17Q041
Please explain:

PFMI: Q.18.3.1
AGC: 79f.

Utilizing limits for settlement.

626 G17Q042
Please explain:

PFMI: Q.18.3.1
AGC: 79g.

Having direct access and control over the movements of participant cash accounts within Target 2-GR / Alpha Bank (cash settlement bank).

627 G17Q043
Please identify and explain:

PFMI: Q.18.3.1
AGC: 79h

628 G17Q044
Please explain briefly how these work:

PFMI: Q.18.3.1
AGC: 79i

629 G17Q045
What are the CSD's policies for conducting enhanced surveillance of, or imposing additional controls on, a participant whose risk profile deteriorates?

PFMI: Q.18.3.2
AGC: n/a

630 G17Q046
What are the CSD's procedures for managing the suspension and orderly exit of a participant that breaches, or no longer meets, the participation requirements?

PFMI: Q.18.3.3
AGC: n/a

631 G17Q047

What enforcement actions are available to the enforcement authority?

PFMI: Q.18.3.3

AGC: 24

- Fines
- Restrictions on participation
- Suspension of participation
- Termination of participation
- Not applicable
- OTHER: Forward the case to the district attorney

632 G17Q048

Please explain:

PFMI: Q.18.3.3

AGC: 24a

Forward the case to the district attorney.

633 G17Q049

Has there been any such enforcement actions in the last three years?

PFMI: Q.18.3.3

AGC: 25

No [N]

634 G17Q050

If yes, please explain, including information relative to any suspensions of CSD participants:

PFMI: Q.18.3.3

AGC: 25a.

635 G17Q051

How are the CSD's procedures for managing the suspension and orderly exit of a participant disclosed to the public?

PFMI: Q.18.3.4

AGC: n/a

636 G17Q052

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Tiered participation (PFMI Principle 19)

637 G18Q001

Summary narrative for PFMI Principle 19. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P19
AGC: n/a

638 G18Q002

Does the CSD have any tiered participation arrangements? If so, describe these arrangements.

PFMI: Q.19.1.1
AGC: n/a

639 G18Q003

How does the CSD gather basic information about indirect participation? Which information is collected and how frequently is it updated?

PFMI: Q.19.1.2
AGC: n/a

640 G18Q004

How does the CSD evaluate its risks arising from these arrangements?

PFMI: Q.19.1.3
AGC: n/a

641 G18Q005

What material risks to the CSD arising from tiered participation arrangements has the CSD identified? How has it mitigated these risks?

PFMI: Q.19.1.4
AGC: n/a

642 G18Q006

How does the CSD identify material dependencies between direct and indirect participants that might affect the CSD?

PFMI: Q.19.2.1
AGC: n/a

643 G18Q007

Has the CSD identified (a) the proportion of activity that each direct participant conducts on behalf of indirect participants in relation to the direct participants' capacity, (b) direct participants that act on behalf of a material number of indirect participants, (c) indirect participants responsible for a significant

proportion of turnover in the system, and (d) indirect participants whose transaction volumes or values are large relative to the capacity of the direct participant through which they access the CSD to manage risks arising from these transactions?

PFMI: Q.19.3.1
AGC: n/a

644 G18Q008

What risks to the CSD arise, and how does the CSD manage these risks arising from key indirect participants?

PFMI: Q.19.3.2
AGC: n/a

645 G18Q009

What are the CSD's policies for reviewing its rules and procedures in order to mitigate risks to the CSD arising from tiered participation? How frequently is this review conducted?

PFMI: Q.19.4.1
AGC: n/a

646 G18Q010

What criteria does the CSD use to determine when mitigating actions are required? How does the CSD monitor and mitigate its risks?

PFMI: Q.19.4.2
AGC: n/a

647 G18Q011

filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

Links (PFMI Principle 20)

648 G19Q001

Summary narrative for PFMI Principle 20. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P20
AGC: n/a

649 G19Q002

What process is used to identify potential sources of risk (such as, legal, credit, liquidity, custody and operational risks) arising from prospective links? How does this affect the CSD's decision whether to establish the link?

PFMI: Q.20.1.1
AGC: n/a

650 G19Q003

What links have been established with other CSD? How does the CSD identify, monitor and manage the risks arising from an established link on an ongoing basis?

PFMI: Q.20.1.2
AGC: n/a

651 G19Q004

Please list all depositories or settlement systems to which you have an electronic link.

PFMI: Q.20.1.2
AGC: 38

Cyprus Stock Exchange CSD (only for dual listed stocks), Bank of Greece (for Government Bonds), Clearstream Banking Frankfurt

652 G19Q005

How does the CSD ensure that link arrangements are designed so that it is able to remain observant of the other principles? How frequently is this analysis conducted?

PFMI: Q.20.1.3
AGC: n/a

653 G19Q006

In which jurisdictions has the CSD established links? What are the relevant legal frameworks supporting the established links?

PFMI: Q.20.2.1
AGC: n/a

654 G19Q007

How does the CSD ensure that its links have a well founded legal basis that support its design and provide it with adequate protection in all relevant jurisdictions? How does the CSD ensure that such protections are maintained over time?

PFMI: Q.20.2.2
AGC: n/a

655 G19Q008

What processes are in place to measure, monitor and manage credit and liquidity risks arising from any established links?

PFMI: Q.20.3.1

AGC: n/a

656 G19Q009

If a CSD extends credit to a linked CSD, what processes exist to ensure that credit extensions to the linked CSD are fully covered by high-quality collateral and that credit limits are appropriate?

PFMI: Q.20.3.2

AGC: n/a

657 G19Q010

Are provisional transfers of securities allowed across the link? If so, what arrangements make provisional transfers necessary, and is the retransfer of these securities prohibited until the first transfer is final?

PFMI: Q.20.4.1

AGC: n/a

658 G19Q011

For any established link, how has the investor CSD determined that the rights of its participants have a high level of protection?

PFMI: Q.20.5.1

AGC: n/a

659 G19Q012

How frequently is reconciliation of holdings conducted by the entities holding the securities in custody?

PFMI: Q.20.5.2

AGC: n/a

660 G19Q013

How does the investor CSD provide a high-level of protection for the rights of its participants (including segregation and portability arrangements and asset protection provisions for omnibus accounts)?

PFMI: Q.20.5.3

AGC: n/a

661 G19Q014

If the CSD uses an intermediary to operate a link, what are the criteria used by the CSD to select the intermediary or intermediaries? Are these criteria risk-based?

PFMI: Q.20.6.1

AGC: n/a

662 G19Q015

What are the respective liabilities of the two linked CSDs and the intermediaries?

PFMI: Q.20.6.2
AGC: n/a

663 G19Q016
What processes exist to measure, monitor and manage the risks arising from use of the intermediary?

PFMI: Q.20.6.3
AGC: n/a

664 G19Q017
filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

Efficiency and effectiveness (PFMI Principle 21)

665 G20Q001
Summary narrative for PFMI Principle 21. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P21
AGC: n/a

666 G20Q002
How does the CSD determine whether its design (including its clearing and settlement arrangement, its operating structure, its delivery systems and technologies, and its individual services and products) is taking into account the needs of its participants and the markets it serves?

PFMI: Q.21.1.1
AGC: n/a

667 G20Q003
How does the CSD determine whether it is meeting the requirements and needs of its participants and other users and continues to meet those requirements as they change (for example, through the use of feedback mechanisms)?

PFMI: Q.21.1.2
AGC: n/a

668 G20Q004
What are the CSD's goals and objectives as far as the effectiveness of its operations is concerned?

PFMI: Q.21.2.1
AGC: n/a

669 G20Q005
How does the CSD ensure that it has clearly defined goals and objectives that are measurable and achievable?

PFMI: Q.21.2.2
AGC: n/a

670 G20Q006
To what extent have the goals and objectives been achieved? What mechanisms does the CSD have to measure and assess this?

PFMI: Q.21.2.3
AGC: n/a

671 G20Q007
What processes and metrics does the CSD use to evaluate its efficiency and effectiveness?

PFMI: Q.21.3.1
AGC: n/a

672 G20Q008
How frequently does the CSD evaluate its efficiency and effectiveness?

PFMI: Q.21.3.2
AGC: n/a

673 G20Q009
filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

Communication (PFMI Principle 22)

674 G21Q001
Summary narrative for PFMI Principle 22. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P22
AGC: n/a

675 G21Q002

Does the CSD use an internationally accepted communications procedure and, if so, which one(s)? If not, how does the CSD accommodate internationally accepted communication procedures?

PFMI: Q.22.1.1

AGC: n/a

676 G21Q003

Security Control. How do participants receive information (view actual settlement of trades, movement of securities on their accounts, etc.) and see the status of their accounts?

PFMI: Q.22.1.1

AGC: 69

- By direct electronic link
- By receipt of physical account holding statements
- Not applicable
- OTHER:

677 G21Q004

Please explain:

PFMI: Q.22.1.1

AGC: 69a.

678 G21Q005

Do participants have access to affect their holdings, including confirming and affirming trades, movement of securities on their accounts, etc.?

PFMI: Q.22.1.1

AGC: 70

Yes [A01]

679 G21Q006

How is access given to participants?

PFMI: Q.22.1.1

AGC: 70a.

- By direct electronic link
- OTHER:

680 G21Q007

Please select type of electronic link:

PFMI: Q.22.1.1

AGC: 70b.

- Dial-up modem
- Secured, leased, dedicated telephone line
- Internet
- Fax

681 G21Q008
Please explain:

PFMI: Q.22.1.1
AGC: 70c.

682 G21Q009

Does the CSD communicate with other market entities such as stock exchanges, payment systems, clearing houses, etc., by secured linkages?

PFMI: Q.22.1.1
AGC: 72

Yes [A01]

683 G21Q010
Please explain:

PFMI: Q.22.1.1
AGC: 72a

ATHEX: secured electronic link via the ATHEX private owned network. ATHEXClear (Securities Clearing House and Derivatives Clearing House and CCP): Dematerialized securities system for government bonds via Swift via the same link, Cash Dematerialized Securities System for government bonds via Swift, Euro cash settlement in T2 environment via Swift, FX cash settlement in Alpha Bank via secured, leased, dedicated line.

684 G21Q011

How does the CSD communicate with Stock Exchanges?

PFMI: Q.22.1.1
AGC: 73 73a

- Dial-up modem
- Secured, leased, dedicated telephone line
- Internet
- Fax
- Paper
- other
- Not applicable
- OTHER:

685 G21Q012

How does the CSD communicate with Payment Systems?

PFMI: Q.22.1.1
AGC: 73b

- Dial-up modem
- Secured, leased, dedicated telephone line
- Internet
- Fax
- Paper
- other
- Not applicable
- OTHER:

686 G21Q013
How does the CSD communicate with Clearing Houses?

PFMI: Q.22.1.1
AGC: 73c

- Dial-up modem
- Secured, leased, dedicated telephone line
- Internet
- Fax
- Paper
- other
- Not applicable
- OTHER:

687 G21Q014
How does the CSD communicate with Registrars?

PFMI: Q.22.1.1
AGC: 73d

- Dial-up modem
- Secured, leased, dedicated telephone line
- Internet
- Fax
- Paper
- other
- Not applicable
- OTHER:

688 G21Q015
If the CSD engages in cross-border operations, how do the CSD's operational procedures, processes and systems use or otherwise accommodate internationally accepted communication procedures for cross-border operations?

PFMI: Q.22.1.2
AGC: n/a

689 G21Q016
Does the CSD use an internationally accepted communications standard and, if so, which one(s)? If not, how does the CSD accommodate internationally accepted communication standards?

PFMI: Q.22.1.3
AGC: n/a

690 G21Q017
If the CSD engages in cross-border operations, how do the CSD's operational procedures, processes and systems use or otherwise accommodate internationally accepted communication standards for cross-border operations?

PFMI: Q.22.1.4
AGC: n/a

691 G21Q018

If no international standard is used, how does the CSD accommodate systems that translate or convert message format and data from international standards into the domestic equivalent and vice versa?

PFMI: Q.22.1.5

AGC: n/a

692 G21Q019

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Transparency and disclosure (PFMI Principle 23)

693 G22Q001

Summary narrative for PFMI Principle 23. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P23

AGC: n/a

694 G22Q002

What documents comprise the CSD's rules and procedures? How are these documents disclosed to participants?

PFMI: Q.23.1.1

AGC: n/a

695 G22Q003

How does the CSD determine that its rules and procedures are clear and comprehensive?

PFMI: Q.23.1.2

AGC: n/a

696 G22Q004

What information do the CSD's rules and procedures contain on the procedures it will follow in non-routine, though foreseeable, events?

PFMI: Q.23.1.3

AGC: n/a

697 G22Q005

How and to whom does the CSD disclose the processes it follows for changing its rules and procedures?

PFMI: Q.23.1.4
AGC: n/a

698 G22Q006

How does the CSD disclose relevant rules and key procedures to the public?

PFMI: Q.23.1.5
AGC: n/a

699 G22Q007

What documents comprise information about the system's design and operations? How and to whom does the CSD disclose the system's design and operations?

PFMI: Q.23.2.1
AGC: n/a

700 G22Q008

How and to whom does the CSD disclose the degree of discretion it can exercise over key decisions that directly affect the operation of the system

PFMI: Q.23.2.2
AGC: n/a

701 G22Q009

What information does the CSD provide to its participants about their rights, obligations and risks incurred through participation in the CSD?

PFMI: Q.23.2.3
AGC: n/a

702 G22Q010

How does the CSD facilitate its participants' understanding of the CSD's rules, procedures and the risks associated with participating?

PFMI: Q.23.3.1
AGC: n/a

703 G22Q011

Is there evidence that the means described above enable participants' understanding of the CSD's rules, procedures and the risks they face from participating in the CSD?

PFMI: Q.23.3.2
AGC: n/a

704 G22Q012

In the event that the CSD identifies a participant whose behaviour demonstrates a lack of understanding of the CSD's rules, procedures and the risks of participation, what remedial actions are taken by the CSD?

PFMI: Q.23.3.3

AGC: n/a

705 G22Q013

Does the CSD publicly disclose its fees at the level of its individual services and policies on any available discounts? How is this information disclosed?

PFMI: Q.23.4.1

AGC: n/a

706 G22Q014

How does the CSD notify participants and the public, on a timely basis, of changes to services and fees?

PFMI: Q.23.4.2

AGC: n/a

707 G22Q015

Does the CSD provide a description of its priced services? Do these descriptions allow for comparison across similar CSD??

PFMI: Q.23.4.3

AGC: n/a

708 G22Q016

Does the CSD disclose information on its technology and communication procedures, or any other factors that affect the costs of operating the CSD?

PFMI: Q.23.4.4

AGC: n/a

709 G22Q017

When did the CSD last complete the PFMI Disclosure framework for financial market infrastructures? How frequently is it updated? Is it updated following material changes to the CSD and its environment and, at a minimum, every two years?

PFMI: Q.23.5.1

AGC: n/a

710 G22Q018

What quantitative information does the CSD disclose to the public? How often is this information updated?

PFMI: Q.23.5.2

AGC: n/a

711 G22Q019

What other information does the CSD disclose to the public?

PFMI: Q.23.5.3

AGC: n/a

712 G22Q020

Capital. Are annual financial statements publicly disclosed?

PFMI: Q.23.5.3

AGC: 13

Yes [A01]

713 G22Q021

If yes, the AGC requests a copy of the institution's annual report. Is the annual report available electronically?

PFMI: Q.23.5.3

AGC: 13a.

Yes [Y]

714 G22Q022

filecount - If yes, please upload the document(s) here or insert web link(s) in question 13d:

PFMI: Q.23.5.3

AGC: 13b.

0

715 G22Q023

filecount - If more than one document for 13b, please upload the additional document here:

PFMI: Q.23.5.3

AGC: 13c.

0

716 G22Q024

Please insert web link(s) for 13b here:

PFMI: Q.23.5.3

AGC: 13d.

<http://www.athexgroup.gr/web/guest/athexcscd>

717 G22Q025

If no, and annual report and/or financial statements are not disclosed, please state your share capital, reserves, and retained earnings (or equivalents as determined under local accounting standards). Share

Capital (then please answer 13f):

PFMI: Q.23.5.3
AGC: 13e.

718 G22Q026

Reserves (then please answer 13g):

PFMI: Q.23.5.3
AGC: 13f.

719 G22Q027

Retained Earnings:

PFMI: Q.23.5.3
AGC: 13g.

720 G22Q028

How does the CSD disclose this information to the public? In which language(s) are the disclosures provided?

PFMI: Q.23.5.4
AGC: n/a

721 G22Q029

AGC members from time to time receive requests from their direct investor-clients for an informational copy of a CSD's completed questionnaire. Such requests typically lead to interactions between personnel at the CSD in question and member personnel or client personnel, or both. Those interactions take time and impose costs on both members and depositories. Do you approve of AGC members delivering a copy of your completed questionnaire to the member's direct client in response to the client's request?

PFMI: Q.23.5.4
AGC: 100

No [N]

722 G22Q030

Are the results of the financial audit publicly available?

PFMI: Q.23.5.4
AGC: 15f

Yes [Y]

723 G22Q031

Are the results of the operational audit publicly available?

PFMI: Q.23.5.4
AGC: 16f

724 G22Q032

List of publicly available resources. Please list publicly available resources, including those referenced in the disclosure, that may help a reader understand the CSD and its approach to observing each applicable PFMI Principle.

PFMI: Annex A - CSD disclosure template - V.

AGC: n/a

725 G22Q033

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Compliance with SEC Rule 17f-7

726 G23Q001

Rule 17f-7, by reference to Rule 17f-4, requires that, for a CSD to be eligible to hold securities of U.S. registered investment companies (such depositories hereinafter referred to as "Eligible Securities Depositories"), the CSD must be a "system for the central handling of securities where all securities of any particular class or series of any issuer deposited within the system are treated as fungible and may be transferred or pledged by bookkeeping entry without physical delivery of the securities."

Are all securities of a particular class or series of any issuer that are deposited in your institution treated as fungible, and can they be transferred or pledged by bookkeeping entry without physical delivery of the securities?

PFMI: n/a

AGC: 1

Yes [Y]

727 G23Q002

Please explain

PFMI: n/a

AGC: 1a

728 G23Q003

Rule 17f-7 also requires that an Eligible Securities CSD "acts as or operates a system for the central handling of securities or equivalent book-entries in the country where it is incorporated," or "acts as or operates a transnational system for the central handling of securities or equivalent book-entries." Does your institution:

PFMI: n/a

AGC: 2

[X] Act as or operate a system for the central handling of securities or equivalent book-entries in the country where it is incorporated?

Act as or operate a transnational system for the central handling of securities or equivalent book-entries?
 Act in another capacity with respect to the handling of securities or equivalent book-entries?
 Not applicable
 OTHER:

729 G23Q004
Please explain:

PFMI: n/a
AGC: 2a.

730 G23Q005
Please specify the types of securities for which you act as or operate a system for the central handling of securities or equivalent book-entries:

PFMI: n/a
AGC: 2b.

All securities listed and traded on the Markets operated by the Athens Stock Exchange namely equities, subscription rights, corporate bonds, government bonds, ETFs , Hellenic Depository Receipts (HDRs) and warrants as well as non-listed corporate bonds and non-listed shares that have been registered in book entry form at ATHEXCSD.

731 G23Q006

Rule 17f-7 requires that an Eligible Securities Depository regulated by a foreign financial regulatory authority as defined under section 2(a)(50) of the Act , with section 2(a)(50) establishing that z 'foreign financial regulatory authority' means any (A) foreign securities authority, (B) other governmental body or foreign equivalent of a self-regulatory organization empowered by a foreign government to administer or enforce its laws relating to the regulation of fiduciaries, trusts, commercial lending, insurance, trading in contracts of sale of a commodity for future delivery, or other instruments traded on or subject to the rules of a contract market, board of trade or foreign equivalent, or other financial activities, or (C) membership organization a function of which is to regulate the participation of its members in activities listed above." Who regulates the activities of the CSD?

PFMI: n/a
AGC: 8

A governmental body or regulatory organization empowered to administer or enforce laws related to securities matters.
 A governmental body or self-regulatory organization empowered to administer or enforce laws related to other financial activities.
 A membership organization which regulates the participation of its members in securities matters or other financial activities.
 OTHER:

732 G23Q007
Please explain:

PFMI: n/a
AGC: 8a.

733 G23Q008

Please provide the name of regulatory authority(ies) identified in question 8:

PFMI: n/a
AGC: 9

Hellenic Capital Market Commission

734 G23Q009

Rule 17f-7 requires that an Eligible Securities Depository is subject to periodic examination by regulatory authorities or independent accountants. Is the CSD subject to periodic examination by:

PFMI: n/a
AGC: 10

Regulatory authorities?
 Independent accountants?
 OTHER:

735 G23Q010

Please explain:

PFMI: n/a
AGC: 10a

736 G23Q011

Name of Authority #1 (please answer 11a):

PFMI: n/a
AGC: 11

Hellenic Capital Market Commission

737 G23Q012

What enforcement actions are available to regulatory authority #1 for breach of applicable statute or regulatory requirements?

PFMI: n/a
AGC: 11a.

Fines
 Restrictions on CSD activities.
 Suspension of CSD activities.
 Termination of CSD activities.
 OTHER: Investigations and administrative measures. Cases of criminal activity indications are referred to the district attorney

738 G23Q013

Please explain:

PFMI: n/a
AGC: 11b.

739 G23Q013A

Name of Authority #2:

740 G23Q014

What enforcement actions are available to regulatory authority #2 for breach of applicable statute or regulatory requirements?

PFMI: n/a
AGC: 11c.

- Fines
- Restrictions on CSD activities.
- Suspension of CSD activities.
- Termination of CSD activities.
- OTHER:

741 G23Q015

Please explain:

PFMI: n/a
AGC: 11d.

742 G23Q016

Has there been any use of such enforcement actions in the last three years?

PFMI: n/a
AGC: 12

- Yes
- No
- OTHER:

743 G23Q017

If yes, please explain:

PFMI: n/a
AGC: 12a.

744 G23Q018

Has the regulatory body with oversight responsibility for the CSD issued public notice that the CSD is not in current compliance with any capital, solvency, insurance or similar financial strength requirements imposed by such regulatory body?

PFMI: n/a
AGC: 90

No [A02]

745 G23Q019

Please describe:

PFMI: n/a
AGC: 90a.

746 G23Q020

In the case of such a notice having been issued, has such notice been withdrawn, or, has the remedy of such noncompliance been publicly announced by the CSD?

PFMI: n/a
AGC: 90b.

Other: Not applicable

747 G23Q021

If yes, please describe:

PFMI: n/a
AGC: 90c.

748 G23Q022

If no, why not?

PFMI: n/a
AGC: 90d.

749 G23Q023

Rule 17f-7 requires that an Eligible Securities Depository holds assets for the custodian that participates in the system on behalf of the Fund under safekeeping conditions no less favorable than the conditions that apply to other participants. Please confirm that assets of foreign investors held by custodians as participants in the CSD are held under safekeeping conditions no less favorable than the conditions that apply to other participants.

PFMI: n/a
AGC: 21

Yes [A1]

750 G23Q024

If no, other or not applicable, please explain:

PFMI: n/a
AGC: 21a.

751 G23Q025

Please confirm the basis for the arrangements you have in place to ensure that the assets you hold for custodians receive the same level of safekeeping protection as the assets held for other categories of participants.

PFMI: n/a
AGC: 21b, 21c.

- Relevant Law and Regulation
- Standard participation contract
- Established terms and conditions of participation
- By-laws of the CSD
- Rules of the CSD
- OTHER: Decisions no 2 and 4 of ATHEXCSD BoD "Standard participation agreement" referring to the access to and use of ATHEXCSD's Dematerialized Securities System

752 G23Q027

For each item in Question 21b that you checked, please briefly supply references or citations to the law(s), regulation(s), or CSD rule(s), participation condition(s), or participant contract provision (s), as applicable.

PFMI: n/a

AGC: 21d

753 G23Q028

Rule 17f-7 requires that an Eligible Securities Depository provides periodic reports to its participants with respect to its safekeeping of assets, including notices of transfers to or from any participant's account. Does the CSD make available periodic safekeeping reports to participants, including notices of transfers to or from the participant's account?

PFMI: n/a

AGC: 46

Yes [A01]

754 G23Q029

If no or other, please explain

PFMI: n/a

AGC: 46a.

755 G23Q030

If yes, please indicate the scheduled frequency:

PFMI: n/a

AGC: 46b, 46c.

Daily
 Weekly
 Monthly
 Quarterly
 Annually
 Upon request
 OTHER: Such information is available to participants in real time, through their connection to the DSS

756 G23Q031

filecount - Add relevant appendices for this group.

PFMI: n/a

AGC: n/a

0

Relevant RSSS recommendations

757 G24Q001

Confirmation of trades between direct market participants should occur as soon as possible after trade execution, but no later than trade date (T+0). Where confirmation of trades by indirect market participants (such as institutional investors) is required, it should occur as soon as possible after trade

execution, preferably on T+0, but no later than T+1.

PFMI: 2 - Trade confirmation
AGC: n/a

758 G24Q002

Rolling settlement should be adopted in all securities markets. Final settlement should occur no later than T+3. The benefits and costs of a settlement cycle shorter than T+3 should be evaluated.

PFMI: 3 - Settlement cycles
AGC: n/a

759 G24Q003

Securities lending and borrowing (or repurchase agreements and other economically equivalent transactions) should be encouraged as a method for expediting the settlement of securities transactions. Barriers that inhibit the practice of lending securities for this purpose should be removed.

PFMI: 5 - Securities lending
AGC: n/a

760 G24Q004

Securities should be immobilised or dematerialised and transferred by book entry in CSDs to the greatest extent possible.

PFMI: 6 - Central securities depositories (CSDs)
AGC: n/a

761 G24Q005

Entities holding securities in custody should employ accounting practices and safekeeping procedures that fully protect customers' securities. It is essential that customers' securities be protected against the claims of a custodian's creditors.

PFMI: 12 - Protection of customers' securities
AGC: n/a

762 G24Q006

filecount - Add relevant appendices for this group.

PFMI: n/a
AGC: n/a

0

Appendices

763 G25Q001

filecount - Add relevant appendices

PFMI: n/a
AGC: n/a

0

764 G25Q002

I am submitting up-to-date information in response to:

AGC questions [A1]