



ATHEXGROUP
Athens Exchange Group

ATHEX Market Indices

Enquiry and Complains

Version 1.2

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Enquiry & Complains regarding ATHEX Market Indices

Introduction

Athens Exchange Group (ATHEX Group), provides support to the Greek Capital Market. ATHEX Group operates the organized Equities and Derivatives markets, the alternative market and performs clearing and settlement of trades.

The Athens Stock Exchange (ATHEX), through its markets, offers solutions and financing tools to businesses, expands investor choice by providing a safe, stable and easy environment in full alignment with international practices and the European regulatory framework. It has held the ISO 22301:2012 international standard for Business Continuity, for all its companies, including all its operations as well as the products & services it provides.

ATHEX always seek to provide products and services to a high standard. To this end, all queries and complains are seriously handled by ATHEX, strive to resolve them satisfactorily as quickly as possible.

General

The guidelines set out in this document serve to address the enquiries and complaints regarding all indices that ATHEX provides independently or in cooperation with other index compilers, institutional associations and companies.

In detail, the enquiries and complaints may address the following issues:

- Errors in index calculation or index adjustments
- Methodology regarding index review processes
- Display of index data or index constituents data on the web site of ATHEX
- Real time price dissemination, delayed and / or end-of-day
- Index licensing and use of the indices

Basic Principles

- Enquiries and complaints are dealt with as fast as possible, but in any case within a fair and reasonable time period
- The handling is performed in accordance with the procedure specified in this document and includes the timely submission of the result to the enquiring party or complainant



- Generally, ATHEX closes enquiries and complaints only after these have been resolved or answered
- Written enquiries and complaints are stored for a minimum period of at least five years

Handling of Enquiry & Complains

Investors, market participants, listed companies with questions or complaints regarding the ATHEX indices may contact any of the ATHEX Group divisions via telephone and e-mail.

Especially for complains, they should be send by e-mail in the following addresses.

<p style="text-align: center;">Index Management</p> <p>Tel: (+30) 210 33 66 800 e-mail: AthexIndexTeam@Athexgroup.gr</p>
<p style="text-align: center;">Index Dissemination</p> <p>Tel: (+30) 210 33 66 800 e-mail: Information-Services@Athexgroup.gr (General) DFS-TS@athexgroup.gr (Data Feed) AthexSite-HelpDesk@Athexgroup.gr (Web Site)</p>
<p style="text-align: center;">Index Licensing</p> <p>Tel: (+30) 210 33 66 800 e-mail: AthexProducts@Athexgroup.gr</p>

After an enquiry is received, the ATHEX staff checks if the communication received is a complaint or if it is a request for information. In the case of a complaint, the competent Index Advisory Committee - for each index family provided by ATHEX - should be informed at its next ordinary meeting.

Enquiries and complaints received are classified into general enquiries:

- General enquiries
- Enquiries regarding data dissemination of all ATHEX indices
- Questions on index methodology and calculation



- Questions on index licensing and use of the indices
- Complaints

General Enquiries

General enquiries relating to indices are usually answered by the Index Management Team (I.M.T.) of ATHEX.

Should new questions arise in the course of answering an enquiry which the I.M.T. cannot answer, forwards these questions to the relevant ATHEX department for assessment.

Index Dissemination

Enquiries and complaints regarding the quality of the data disseminated are usually answered by ATHEX Data Analysis & Communication unit (unless it is questions of technical nature that you are forward to ATHEX technical department). The enquiries received may refer, for example, to problems relating to index dissemination and/or to the display of index data in the statistical information products, on index composition files, on the website of ATHEX.

If an enquiry or complaint reveals an existing problem that concerns current index calculations, a message is sent immediately to all market participants.

Enquiries or complaints that may not be answered quickly and efficiently are submitted to I.M.T as the next escalation step where I.M.T decides on the further mode of procedure and supervises the further treatment of the problem or enquiry. The party who sent the enquiry or complaint should be notified when a permanent solution has been found.

If after the escalation of the enquiry or complaint in the I.M.T. the problem that has arisen is not possible to be resolved, then the next step of escalation for resolving it, is to inform the competent Index Advisory Committee which examines the matter and informing the sender of the question or the complaint.

Index Methodology & Calculation

Enquiries or complaints that concern the index methodology and calculation are ranked by priority by the I.M.T after receipt.

Should a response to an enquiry or complaint or the solution to a problem be of relevance for the current index methodology and calculation, then I.M.T. will send a corresponding notification to all market participants. Should a complaint refer to a subject in which an I.M.T. staff member was involved, this staff member will not be involved in the response or solution to the problem.



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Depending on the content, the enquiry or complaint is answered immediately by the I.M.T., or in more difficult cases, it is escalated to the next higher level, namely to the relevant Index Advisory Committee. The I.M.T. instructs the competent staff of ATHEX to deal with the enquiry or problem and supervises proper implementation until it is resolved when it informs the relevant Index Advisory Committee.

If a complainant is not satisfied with the response to a complaint, then the I.M.T. may decide to let the relevant Index Advisory Committee to deal with it. After consultation and discussion, the relevant Index Advisory Committee reaches a decision giving the reasons and informing the complainant.

Enquiries or complaints that do not have an immediate effect on the index methodology and calculation but require more discussion may - upon assessment by I.M.T. – be presented to the relevant Index Advisory Committee for discussion in one of its next meetings. The I.M.T. may also conduct surveys regarding market participants who are not represented in the committee in order to achieve a broader consensus.

Index Licensing & Use of the Indices

Enquiries or complaints regarding licensing or the use of indices are answered by the staff of the New Listings Department for the indices provided independently by ATHEX or forwarded to other index compilers, institutional associations and companies that ATHEX provides indices in cooperation.

Further Information

For further information on ATHEX Market Indices please visit <http://www.athexgroup.gr> or e-mail to AthexIndexTeam@Athexgroup.gr