

Market Data & Reasonable Commercial Basis Public Information according (EU) 2017/567 Article 11

A. Price List

The ATHEX current price list, last updated on 1st September of 2014 and particularly for Non-Display and Web Sites public display, next update took effect on January 4, 2021. The price list is available at the following link: <http://www.athexgroup.gr/en/web/guest/price-list>

The ATHEX price list regarding the MIFID II products introduced on Jan 3rd of 2018, is also available at:

- <http://www.athexgroup.gr/en/web/guest/price-list> and
- <http://www.athexgroup.gr/documents/10180/26532/ATHEX+MIFID+II+INFORMATI+ON+PRODUCTS+v1-0.pdf/0d1a3cf5-cd5a-409d-8fbb-9b4c6d1f4504>

and updated on January 4, 2021 regarding Non Display and next update will take place on July 1, 2021 regarding the Display (per User) fees for professional users:

<https://www.athexgroup.gr/documents/10180/6231344/ATHEX+MIFID+II+INFORMATION+P+RODUCTS+v3-0+2021.pdf/a4eea810-d4cc-458d-99ef-9d7907c5994a>

Please note that:

1. A minimum 90 days' prior notice is offered for any change in the above mentioned price lists.
2. The Market Data are offered to all customers in equal terms, within each customer category, according to the officially published pricing policy.

B. Content of the Market Data

ATHEX MARKET DATA CONTENT (2020)			
Market	Number of Instruments	Turnover for (including block trades)	Pre/Post Trade ratio
Stocks	175	€ 15,995,517,350.38	5.49
Bonds	57	€ 178,727,445.00	83.14
Derivatives	36	€ 3,079,151,750.13	4.15
Total	268	€ 19,253,396,545.51	10.08

Pre/Post Trade ratio = (total number of orders/total number of transactions) - 1

Information included in the Real Time Data Feed in addition to Pre/Post Trading prices and volumes:



ATHEXGROUP
Athens Exchange Group

- Market Phase and Instrument Status updates
- Volatility Interrupter Events
- Projected Prices & Volumes during Auctions
- RTS 1,2 Flags
- Closing & fixing prices

Information provided in addition to Real Time / Delayed Market Data:

- ✓ Historical Data
- ✓ Tick Data
- ✓ Reference Data

C. Revenue Obtained from Market Data

The ATHEX Group total revenue from Market Data, as per 2020 audited financial statements, is 2,643,000€ contributing 8.6% to the Group's consolidated revenues (Total Turnover).

D. Information on the methodologies used to set the Market Data pricing policy

The ATHEX has adhered to the following principles in determining the price list regarding the Market Data:

1. It continues to keep its data feed prices among the lowest in Europe
2. Reasonable profit margin
3. No price increase has taken place in the period 2010-2020
4. Price reductions in selected products has taken place since 2010
5. ATHEX makes efforts to keep the Market Data cost burden low for the entire Market: The ratio "Market Data total Exchange's revenue / Market Capitalization (Average Market Cap)" is well below than the 2019 Oxera study limits (<0.01%) as it is 0.0056% in 2020 (Average Market Cap of 2020 was 47.5 billion euros)
6. Cost accounting methodology applied takes into account a) direct costs totally allocated to the Market Data and b) indirect costs attributed to Market Data by relevant allocation keys. For more information, please refer to the Audited Financial Statements published on the ATHEX Group web site: <https://www.athexgroup.gr/ir>