

WFC Single Disclosure Report 2020**AGC answers**

Date submitted

13/11/2020 04:01:02

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

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.

Yes, my response will be public, but only for my answers to AGC questions.

Yes, my response will be public, but only for my answers to PFMI questions.

No, I do not wish my response to be publicly available.

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

Vagenas Georgios, Asset Services 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 3366304

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 3366712

15 G01Q014

What is the preferred street address for mailing requests?

PFMI: n/a
AGC: 99g

110 Athinon Avenue, 10442 Athens

25 G01Q024

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

- The AGC questions and a report with only AGC answers will be generated
- The PFMI questions and a report with only PFMI answers will be generated
- Both the AGC and PFMI questions and a report with answers to both questionnaires will be generated

Legal Basis (PFMI Principle 1)

27 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").

28 G02Q003

Is the regulation or statute electronically available?

*PFMI: n/a**AGC: 7a* Yes No

29 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).

30 G02Q005

filecount - Please supply document(s) here:

*PFMI: n/a**AGC: 7c*

L1806_88 .pdf (173KB)

Law
1806/1988

1

Governance and ownership (PFMI Principle 2)

45 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:

46 G03Q003

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

PFMI: n/a
AGC: 4

- Not for profit
- For profit

47 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 whose shares are traded on the Athens Exchange. On 31 August 2020 ATHEX had approximately 11,350 shareholders. The breakdown per shareholder type is: International (i.e. non-Greek) investors 47.0%, Local retail investors 28.1%, Local inst. investors 16.6%, Local banks 5.8%, ATHEX Members 1.0%, ATHEX Management Team 0.1%, Other 1.4%. There is one shareholder with a stake of > 5%: 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/athex-financial-results>

48 G03Q005

What is the date of establishment of the CSD?

PFMI: n/a
AGC: 6a

22/02/1991

49 G03Q006

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

PFMI: n/a
AGC: 6b

22/02/1991

50 G03Q007

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

PFMI: n/a
AGC: 18

- Not applicable
- No
- Yes

51 G03Q008

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

PFMI: n/a
AGC: 18a.

59 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>.

61 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.

62 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.

63 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.

65 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).

Comprehensive risk management (PFMI Principle 3)

88 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.

- Not applicable
- No
- Yes

89 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:

90 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
- No
- Yes

91 G04Q006
Please define the standard of care applied:

PFMI: Q.3.1.1
AGC: 66*

Credit risk (PFMI Principle 4)

121 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

No

Yes

122 G05Q012

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

PFMI: Q.4.3.1

AGC: 78a.

123 G05Q013

How is the size of the fund determined?

PFMI: Q.4.3.1

AGC: 78b.

A fixed amount

By asset value

By participant volume

124 G05Q014

How is the fund financed?

PFMI: Q.4.3.1

AGC: 78d.

Funding from retained earnings

Contributions from participants

Contributions from owner

125 G05Q015

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

PFMI: Q.4.3.1
AGC: 78e.

126 G05Q016

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

PFMI: Q.4.3.1
AGC: 78f.

127 G05Q017

Who is covered by the fund?

PFMI: Q.4.3.1
AGC: 78h.

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

128 G05Q018

When is the guaranty fund used?

PFMI: Q.4.3.1
AGC: 78j.

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

131 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
- No

Yes

132 G05Q022

What is the amount of the coverage?

PFMI: Q.4.3.3

AGC: 91a

133 G05Q023

What is the amount of the deductible?

PFMI: Q.4.3.3

AGC: 91b

134 G05Q024

Please explain other loss or default protections:

PFMI: Q.4.3.3

AGC: 79a

135 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.

Not applicable

No

Yes

136 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:

Collateral (PFMI Principle 5)

141 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

Liquidity risk (PFMI Principle 7)**Settlement finality (PFMI Principle 8)****Money settlements (PFMI Principle 9)**

217 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:

218 G09Q004

Please indicate the name of the banks appointed by the CSD

PFMI: Q.9.1.1
AGC: 31a

219 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:

220 G09Q006

Please name banks appointed by the CSD

PFMI: Q.9.1.1

AGC: 32a

221 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:

222 G09Q008

Please name banks appointed by the CSD

PFMI: Q.9.1.1

AGC: 33a

223 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:

224 G09Q010

Please name banks appointed by CSD

*PFMI: Q.9.1.1**AGC: 34a***Physical deliveries (PFMI Principle 10)**

239 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

240 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

241 G10Q007

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

PFMI: Q.10.1.3

AGC: 59, 59b

- Not applicable
- More than 4 weeks
- 2 to 4 weeks
- 3 days to 1 week
- 1 to 2 days

242 G10Q008

Please specify

PFMI: Q.10.1.3

AGC: 59a

243 G10Q009

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

PFMI: Q.10.1.3

AGC: 60

- Not applicable
- No

Yes

244 G10Q010

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

PFMI: Q.10.1.3

AGC: 60a

Not applicable

No

Yes

245 G10Q011

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

PFMI: Q.10.1.3

AGC: 60b

Not applicable

No

Yes

246 G10Q012

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

PFMI: Q.10.1.3

AGC: 60c

247 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).

248 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).

249 G10Q015

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

PFMI: Q.10.1.3

AGC: 61, 61d

- Not applicable
- No
- Yes

250 G10Q016

If no: Securities are unavailable for

PFMI: Q.10.1.3

AGC: 61a

- Not applicable
- More than 4 weeks
- 2 to 4 weeks
- 3 days to 1 week
- 1 to 2 days
- Other: Up to 1 day

251 G10Q017

If more than 4 weeks, please specify

PFMI: Q.10.1.3

AGC: 61b

252 G10Q018

If not applicable, please explain

PFMI: Q.10.1.3
AGC: 61c

253 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

- Not applicable
- Securities are transferred as is any physical delivery in the market.
- Securities are re-certificated and delivered as bearer instruments.
- Securities are re-certificated and re-registered into the name of the beneficia
- Securities are re-registered into the name of the beneficial owner or a nominee.
- 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.

254 G10Q020

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

PFMI: Q.10.1.3
AGC: 64, 64b

- Not applicable
- More than 4 weeks
- 2 to 4 weeks
- 3 days to 1 week
- 1 to 2 days

255 G10Q021

If more than 4 weeks, please specify

PFMI: Q.10.1.3
AGC: 64a

256 G10Q022

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

PFMI: Q.10.1.3

AGC: 65a

- Yes
- Not applicable
- No

257 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.

258 G10Q024

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

PFMI: Q.10.1.3

AGC: 65c

- Yes
- Not applicable
- No
- Other: Unsettled pending transactions and OTC transfers may be settled

259 G10Q025

If they cannot be settled, please explain

PFMI: Q.10.1.3

AGC: 65d

260 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
- Not applicable
- No

261 G10Q027

If ownership cannot be transferred, please explain

PFMI: Q.10.1.3

AGC: 65f

263 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:

264 G10Q030

Please indicate frequency of vault counts:

PFMI: Q.10.2.1

AGC: 75a.

265 G10Q031

Please explain:

PFMI: Q.10.2.1
AGC: 75b

Central Securities Depositories (PFMI Principle 11)

271 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

272 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

273 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:

274 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)).

275 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)).

276 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)

277 G11Q008

(ii) safekeep in your CSD:

PFMI: n/a

AGC: 27b. (ii)

278 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.

279 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

281 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

- Not applicable
- No
- Yes

282 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 main account is blocked, the securities belonging to its client will not be affected as they are kept and operated in completely separate accounts.

283 G11Q014

By the intervening authorities controlling insolvency or other proceedings?

*PFMI: Q.11.1.1**AGC: 44d.*

- Not applicable
- No
- Yes

284 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

285 G11Q016

By the participant's creditors?

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

- Not applicable
- No
- Yes

286 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*

287 G11Q018

By the CSD's creditors?

PFMI: Q.11.1.1

AGC: 44j.

- Not applicable
- No
- Yes

288 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.

289 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

- 7 years
- 5 years
- 3 years
- 1 year
- 6 months or less
- 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.

290 G11Q021

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

PFMI: Q.11.1.1
AGC: 54

- Not applicable

- No
- Yes

291 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

- Yes
- No
- Not applicable

292 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:

293 G11Q024

Please describe:

PFMI: Q.11.1.1

AGC: 55b

294 G11Q025

Please indicate the limits of this lien as indicated below:

PFMI: Q.11.1.1

AGC: 55c

- The lien may extend to settled client positions

- The lien is limited to securities in the course of purchase and sale transactio
- The lien is limited to securities in the participant's proprietary account

295 G11Q026

Please explain:

PFMI: Q.11.1.1

AGC: 55d

296 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
- Yes

297 G11Q028

If yes, please indicate whether:

PFMI: Q.11.1.1

AGC: 55f

- The lien is placed on the securities with the greatest value in the account
- The lien is placed on the most liquid securities in the account

298 G11Q029

Please explain:

PFMI: Q.11.1.1

AGC: 55g

299 G11Q030

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

PFMI: Q.11.1.1

AGC: 55h

- No
- Yes

300 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
- Yes

301 G11Q032

If yes, are the restrictions accomplished by:

PFMI: Q.11.1.1

AGC: 55k

- Contract between the CSD and the participant

302 G11Q033

Please explain:

PFMI: Q.11.1.1

AGC: 55l

303 G11Q034

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

PFMI: Q.11.1.1

AGC: 56, 56e

- Not applicable
- No
- Yes

304 G11Q035

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

PFMI: Q.11.1.1

AGC: 56a

- When the transaction is processed on an intra-day basis
- When corresponding money or other consideration is transferred
- At the end of the business day on which the transfer occurs

305 G11Q036

Please describe:

PFMI: Q.11.1.1

AGC: 56b

306 G11Q037

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

PFMI: Q.11.1.1

AGC: 56c

- On the registrars books
- On the CSD books

307 G11Q038

Please describe:

PFMI: Q.11.1.1

AGC: 56d

309 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:

310 G11Q041

In which format is the source data maintained?

PFMI: Q.11.1.2

AGC: 45b

ATHEXCSD's database files and backup archives

315 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

318 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:

320 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
- Certain designated securities may be held outside the CSD
- Once entered into the CSD, eligible securities must remain in the CSD
- Securities may move freely into and out of the CSD
- All eligible securities must be held in the CSD

321 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

322 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

323 G11Q054

Are these certificates:

PFMI: Q.11.3.2

AGC: 51c

- Bearer
- Registered
- OTHER:

324 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:

325 G11Q056

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

PFMI: Q.11.3.2

AGC: 51f

326 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

Registered

Bearer

327 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

328 G11Q059

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

PFMI: Q.11.3.2

AGC: 52

Not applicable

No

Yes

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

329 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:

330 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:

331 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*

- No
- Yes

332 G11Q063

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

*PFMI: Q.11.3.2**AGC: 52e*

- In the name of a separate nominee of the CSD
- In the name of the CSD

- 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.

333 G11Q064
Please describe:

PFMI: Q.11.3.2
AGC: 52f

334 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

- A nominee
- The beneficial owner

335 G11Q066
Please describe:

PFMI: Q.11.3.2
AGC: 52h

338 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

- Yes
- Not applicable
- No

339 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:

340 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

- Not applicable
- Yes
- No

341 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:

342 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.

- Not applicable
- Yes
- No

343 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:

344 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:

345 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:

347 G11Q078

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

PFMI: Q.11.4.2

AGC: 68

- No
- Yes

349 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

- Not applicable
- No
- Yes
- Other: Direct Financial Loss and Professional Indemnity. Total coverage €35 million, deductible €200,000 per case.

350 G11Q081

What is the amount of the coverage?

PFMI: Q.11.4.3

AGC: 92a.

351 G11Q082

What is the amount of the deductible?

PFMI: Q.11.4.3

AGC: 92b.

See answer in question 349

352 G11Q083

Does the CSD have insurance for Operational Errors?

PFMI: Q.11.4.3

AGC: 93

- Not applicable
- No
- Yes
- Other: See answer in question 349

353 G11Q084

What is the amount of the coverage?

PFMI: Q.11.4.3

AGC: 93a.

354 G11Q085

What is the amount of the deductible?

PFMI: Q.11.4.3

AGC: 93b.

See answer in question 349

355 G11Q086

Does the CSD have Errors and Omissions insurance?

PFMI: Q.11.4.3

AGC: 94

- Not applicable
- No
- Yes

356 G11Q087

What is the amount of the coverage?

PFMI: Q.11.4.3

AGC: 94a.

See answer in question 349

357 G11Q088

What is the amount of the deductible?

PFMI: Q.11.4.3
AGC: 94b.

See answer in question 349

358 G11Q089

Does the CSD have insurance for the Premises?

PFMI: Q.11.4.3
AGC: 95

- Not applicable
- No
- Yes

359 G11Q090

What is the amount of the coverage?

PFMI: Q.11.4.3
AGC: 95a.

€22,366,554.00 (for all buildings)

360 G11Q091

What is the amount of the deductible?

PFMI: Q.11.4.3
AGC: 95b.

Deductible per case: i) Political Risks and terrorists acts: 5% of the covered capital for every damage (min €3,000), ii) Earthquake: 2% of the covered capital for every damage, iii) €500 per damage from short circuit with or without flame iv) €200 per damage from glass breakage v) 10% of the covered capital for every other damage.

361 G11Q092

Does the CSD have any other insurance?

PFMI: Q.11.4.3
AGC: 96, 96d

- Not applicable
- No

Yes

362 G11Q093

If so, what is it for?

PFMI: Q.11.4.3

AGC: 96a.

- Directors and Officers responsibility.
- Civil Liability
- Loss of money damages
- Electronic equipment coverage
- Cyber risk insurance

363 G11Q094

What is the amount of the coverage?

PFMI: Q.11.4.3

AGC: 96b.

- Directors and Officers responsibility: €50 million per case - aggregate per year.
- Civil Liability: a) Against third party €2 million b) Personnel €1 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
- Electronic equipment coverage: €10,031,349.36₂
- Cyber risk coverage: €7,000,000.00₂

364 G11Q095

What is the amount of the deductible?

PFMI: Q.11.4.3

AGC: 96c.

- Directors and Officers responsibility: €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
 - (c) Third party Civil liability for bodily injuries and property damage caused by political hazards, strikes, riots, terrorist acts, malicious acts etc: €3.000
- Loss of money damages: 0
 - Electronic equipment coverage

- i) 10% per case min €150- max €350 (value of equipment up to €15,000)
- ii) €900 (value of equipment €15,001 - €30,000)
- iii) €1,500 (value of equipment €30,001 - €150,000)
- iv) €3,000 (value of equipment > €150,001)

- Cyber Risk coverage: €100,000 for Data Protection & Cyber, Liability excluding PCI-DSS, Assessment, Event Management, Cyber Extortion and 8 hours for Network Interruption.

365 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 insurance: - AIG - ETHNIKI Hellenic General Insurance Company S.A, - Europe Insurance Co - Interamerican

366 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 10 million), 2) Ethniki: 100% (2nd contract: amount of coverage 40 million). - Direct Financial Loss and Professional Indemnity: Ethniki: 100% - Premises Insurance: Europe 70%, Ethniki 30% - Civil Liability: Interamerican 100%, - Cash Transfers: Interamerican 100%, - Electronic equipment coverage: Ethniki: 60%, Europe 40% - Cyber Risk insurance: AIG: 100%.

367 G11Q098

What is the term of the policy?

PFMI: Q.11.4.3

AGC: 97b.

- Directors and Officers responsibility: 01/02/2020 - 31/01/2021 - Direct Financial Loss and Professional Indemnity: 01/02/2020 - 31/01/2021 - Premises Insurance: 31/01/2020-31/01/2021 - Civil Liability: 31/01/2020-31/01/2021, - Cash Transfers: 31/01/2020-31/01/2021, - Electronic equipment coverage: 01/02/2020 - 31/01/2021 - Cyber Risk insurance: 13/04/2020-13/04/2021

368 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. -Electronic equipment: ATHEX Group -Cyber Risk Insurance: The Policy holder (Hellenic Exchanges - Athens Stock Exchange S.A) and any Subsidiary

369 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

370 G11Q101

filecount - Upload document here:

PFMI: Q.11.4.3

AGC: 98a.

0

371 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:

372 G11Q103

Please explain (then please answer 67c):

PFMI: Q.11.4.3

AGC: 67b.

373 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.

374 G11Q105

Insurance

PFMI: Q.11.4.3

AGC: 67d.

Yes

No

Not applicable

OTHER:

375 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 €127,443,903.36. Specifically: 1) D&O Coverage is €50,000,000 per case, aggregate per year, €50,000 deductible per case. 2) Direct Financial Loss & Prof. Indemnity (DFL + PI COVERAGE): €35,000,000 for DFL aggregate per year, €200,000 deductible per case. 3) Premises Insurance: €22,366,554. Deductible per case: i) Political Risks and terrorists acts: 5% of the covered capital for every damage (min €3,000), ii) Earthquake: 2% of the covered capital for every damage, iii) €500 per damage from short circuit with or without flame iv) €200 per damage from glass breakage v) 10% of the covered capital for every other damage. 4) Civil Liability: (a) Against third party: €2,000,000. Deductible per case €600. (b) Personnel: €1,000,000. Deductible first 3 working days of the date / time of the accident Cash transfers: a) €6,000 loss of money during transfer b) €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 5) Electronic equipment coverage: €10,031,349.36. Deductible: i) 10% per case min €150- max €350 (value of equipment up to €15,000) ii) €900 (value of equipment €15,001 - €30,000) iii) €1,500 (value of equipment €30,001 - €150,000) iv) €3,000 (value of equipment > €150,001) 6) Cyber Risk coverage (includes Data Protection & Cyber Liability excluding PCI-DSS Assessment, Event Management, Cyber Extortion and Network Interruption): €7.000.000,00. Deductible: €100.000 for Data Protection & Cyber Liability excluding PCI-DSS Assessment, Event Management, Cyber Extortion and 8 hours for Network Interruption.

376 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.

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

377 G11Q108
Acknowledgement of liability for losses caused by CSD's own actions.

PFMI: Q.11.4.3
AGC: 67g.

- Not applicable
- No
- Yes

378 G11Q109
Please explain (then please answer 67i):

PFMI: Q.11.4.3
AGC: 67h.

Covered by the insurance mentioned above, under 374 and 375.

379 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 Greece SA, Ethniki Hellenic General Insurance Company S.A, Europe Insurance Co and Interamerican.

380 G11Q111
Other

PFMI: Q.11.4.3
AGC: 67j.

- Yes
- No

381 G11Q112

Please explain (then please answer 67l):

PFMI: Q.11.4.3

AGC: 67k.

382 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.

384 G11Q115

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

PFMI: Q.11.5.1

AGC: 41

- Not applicable
- No
- Yes
- 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)

385 G11Q116

If yes, please indicate number:

PFMI: Q.11.5.1

AGC: 41a, 41c

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

386 G11Q117

If more than one account what is the maximum?

PFMI: Q.11.5.1

AGC: 41b

388 G11Q119

Are participants required/permited 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:

389 G11Q120

If yes, is segregation required or simply permitted?

PFMI: Q.11.5.2

AGC: 42a

- Permitted
- Required

390 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:

391 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

- Not applicable
- No
- Yes

392 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

- Yes
- No

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.

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

408 G12Q003

Does the CSD guaranty settlement?

PFMI: Q.12.1.1

AGC: 66u.

Not applicable

Yes

No

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.

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

415 G12Q010

Are the cash and security movements simultaneous?

PFMI: Q.12.1.3

AGC: 49

- Not applicable
- No
- Yes

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

- 2 days
- Overnight
- 5 hours
- 4 hours
- 3 hours

- 2 hours
- 1 hour

Participant default rules and procedures (PFMI Principle 13)

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*

- Not applicable
- No
- Yes

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

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 does not provide clearing services. So 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

- Limited to participants with transactions with failing counterparty
- Pro-rata based on participant's volume
- Equally, among participants

430 G13Q013

Please explain:

PFMI: Q.13.1.4
AGC: 76d

General business risk (PFMI Principle 15)

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

No

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 2020

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.

17/07/2020

443 G14Q005
Please list the period that the audit covered:

PFMI: n/a
AGC: 15c.

Start date: 01/01/2020
End date: 30/06/2020

444 G14Q006
How frequently does the financial audit occur?

PFMI: n/a
AGC: 15d.

- Less than annually
- Annually
- Two or more times a year

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.

- Material exceptions found.
- Minor exceptions found.
- No material exceptions found.

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

- Not applicable
- No
- Yes

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

- Not applicable
- No
- Yes

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

- Not applicable
- None of the last three years
- Yes for one of the last three years
- Yes for two of the last three years
- Yes for all three years

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

- Not applicable
- No
- Yes

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.

468 G14Q030

Does the CSD maintain a reserve for operating losses?

*PFMI: Q.15.2.1**AGC: 89, 89b*

- Not applicable
- No
- Yes
- Other: According to the financial data until 30/06/2020, ATHEXCSD has formed reserves of EUR 11.8 million.

471 G14Q033

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

*PFMI: Q.15.2.2**AGC: 89a.***Custody risk (PFMI Principle 16)**

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.

- Yes
- No

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.

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.

Operational risk (PFMI Principle 17)

514 G16Q011

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

PFMI: Q.17.2.3
AGC: 14

Yes

No

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: 01/01/2020
End date: 31/08/2020
Audit date: 23/09/2020

517 G16Q014
How frequently does the internal audit occur?

PFMI: Q.17.2.3
AGC: 14c.

- Less than annually
- Annually
- Two or more times a year

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.

- Yes
- No

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

PFMI: Q.17.2.3
AGC: 14f.

- Material exceptions found.

- Minor exceptions found.
- No material exceptions found.

521 G16Q018

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

PFMI: Q.17.2.3

AGC: 14g.

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
- No

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 2020, an IT audit was performed by EY in collaboration with the Internal Audit Division.

An annual IT audit on Athex Group companies was initiated on 18/June/2020 by SolCrowe in in cooperation with the Internal audit Division of Athex.

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.

18/06/2020

526 G16Q023

Please list the period that the audit covered:

PFMI: Q.17.2.4

AGC: 16c.

Start date: 01/01/2020
End date: 12/06/2020

527 G16Q024

How frequently does the operational audit occur?

PFMI: Q.17.2.4

AGC: 16d.

- Less than annually
- Annually
- Two or more times a year

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.

The last operational (IT Audit follow up) took place at June 2020.

529 G16Q026

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

PFMI: Q.17.2.4

AGC: 16g.

- Material exceptions found.
- Minor exceptions found.
- No material exceptions found.

530 G16Q027

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

PFMI: Q.17.2.4

AGC: 16h.

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.

541 G16Q038

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

PFMI: Q.17.5.3

AGC: 71 71a.

- Not applicable
- No
- Yes

542 G16Q039

Does each user have a unique user ID?

PFMI: Q.17.5.3

AGC: 71c.

- Not applicable
- No
- Yes

543 G16Q040
Are passwords regularly changed?

PFMI: Q.17.5.3
AGC: 71e.

- Not applicable
- No
- Yes

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.

- Not applicable
- No
- Yes

546 G16Q043
How many?

PFMI: Q.17.5.3
AGC: 71i.

3

550 G16Q047

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

*PFMI: Q.17.6.2**AGC: 82*

- Not applicable
- Longer than 24 hours
- 8 - 24 hours
- 4 - 8 hours
- 1 - 4 hours

553 G16Q050

Will the CSD publicly announce any system interruption?

*PFMI: Q.17.6.4**AGC: 84*

- Not applicable
- No
- Yes

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.

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

- Not applicable
- Longer than 24 hours
- 8 - 24 hours
- 4 - 8 hours
- 1 - 4 hours

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
- No

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 DRC 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 October 19th 2019. From 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.

Tests are conducted on a yearly basis. The last date of testing with Member participation was, on October 19th 2019.

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.

Tests are conducted on a yearly basis. The last date of testing with Member participation was, on October 19th 2019.

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

- Not applicable
- No
- Yes

573 G16Q070

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

PFMI: Q.17.6.8
AGC: 85a.

- Longer than 4 hours
- 2 - 4 hours
- 1 - 2 hours
- Less than 1 hour

574 G16Q071

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

PFMI: Q.17.6.8
AGC: 85b.

- Longer than 24 hours
- 8 - 24 hours
- 4 - 8 hours
- 1 - 4 hours

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.*

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.

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
- No
- Not applicable
- Other

Access and participation requirements (PFMI Principle 18)

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

- Not applicable
- No
- Yes
- 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

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

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.

17 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.

32 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

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: 17t.

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.

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

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

 Yes No

634 G17Q050

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

PFMI: Q.18.3.3

AGC: 25a.

Tiered participation (PFMI Principle 19)**Links (PFMI Principle 20)**

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

Efficiency and effectiveness (PFMI Principle 21)**Communication (PFMI Principle 22)**

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

- Not applicable
- No
- Yes

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*

- Not applicable
- No
- Yes

683 G21Q010

Please explain:

*PFMI: Q.22.1.1**AGC: 72a*

ATHEX: secured electronic link via the ATHEX privately owned network. ATHEXClear (Securities Clearing House and Derivatives Clearing House and CCP): via the same link, BoGS: Investor CSD Link via SWIFTNet, Target2-GR: cash settlement via SWIFTNet, Alpha Bank: FX cash settlement via secured, leased, dedicated line, Clearstream: Investor CSD Link via SWIFTNet

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:

Transparency and disclosure (PFMI Principle 23)

712 G22Q020

Capital. Are annual financial statements publicly disclosed?

PFMI: Q.23.5.3

AGC: 13

- No
- Yes

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
- No

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.

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

- Yes
- No

722 G22Q030
Are the results of the financial audit publicly available?

PFMI: Q.23.5.4
AGC: 15f

- Yes
- No

723 G22Q031
Are the results of the operational audit publicly available?

PFMI: Q.23.5.4
AGC: 16f

- Yes
- No

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
- No

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

- 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 a '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

- Not applicable
- No
- Yes

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.

- No
- Yes
- 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
- No
- Not applicable

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's 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

- No
- Yes

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

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:

Relevant RSSS recommendations**Cyber Security**

764 G25Q001

Does your organization have a documented cyber security policy in place?

*PFMI: n/a**AGC: 101*

- Yes
- No

We have an ISO27001-aware Information Security Framework (ISF), that covers all of the aspects of the ISO27001 standard.

765 G25Q001A

filecount - If you answered Yes to the previous question, please provide a copy or overview

0

766 G25Q002

Please confirm that your staff receive relevant training about this policy.

*PFMI: n/a**AGC: 102*

- Yes
- No

767 G25Q003

Please provide an overview of your policy for continuity of business in the event of a large data breach or cyber attack against your organization.

PFMI: n/a

AGC: 103

We have an ISO22301-compliant Business Continuity Plan.

768 G25Q004

In the last 12 months have there been any changes to the policy?

PFMI: n/a

AGC: 104

Yes

No

769 G25Q005

Please advise how often you review the policy.

PFMI: n/a

AGC: 105

Annually

Semi-annually

Other

770 G25Q006

filecount - Please provide (as an attachment) a diagram showing where your cyber security function resides and who it reports to.

PFMI: n/a

AGC: 106

Question 770.pdf (200KB)

1

771 G25Q007

How does your organization identify which business functions carry a cyber risk

PFMI: n/a

AGC: 107

All functions that are based on Information Assets are assessed through an Information Security Risk Assessment (ISRA) process that assesses such risks.

772 G25Q008

Do you conduct ongoing testing and monitoring processes to ensure that all internal and external connectivity and system configurations are not at risk of cybersecurity breaches?

PFMI: n/a

AGC: 108

Yes

No

773 G25Q009

What technological controls and protections are in place for your systems and networks?

PFMI: n/a

AGC: 109

774 G25Q010

Does your organization use multi-factor authentication

PFMI: n/a

AGC: 110

Yes

No

775 G25Q011

Where your organization has outsourced activities or functions to a third-party provider, is your cyber risk exposure documented?

PFMI: n/a

AGC: 111

Yes

No

776 G25Q012

What measures does your organization have to ensure early detection of a cyber attack?

*PFMI: n/a**AGC: 112*

777 G25Q013

What is the agreed resumption time for critical operations following a cyber attack?

*PFMI: n/a**AGC: 113*

778 G25Q014

How would you advise clients of a successful cyber attack against your organization?

*PFMI: n/a**AGC: 114*

Wherever required to do so, we would contact them directly.

779 G25Q015

In the last 12 months has your organization been subject to a cyber attack that impacted the service you provide to us? If yes, please provide details.

*PFMI: n/a**AGC: 115* Yes No

780 G25Q016

Are the following elements of your cybersecurity framework tested pre and post deployment of changes?

*PFMI: n/a**AGC: 116* Vulnerability assessment Scenario based penetration tests Testing of incident response process and technical/business/operations (e.g. table-top exercise) OTHER:

781 G25Q017

For cloud technology and associated cyber security risks, do you have procedures and controls in place to protect our information from mishandling or theft?

In the comments section could you please explain how these procedures and controls tie back to your record retention policy?

PFMI: n/a

AGC: 117

Yes

No

782 G25Q018

Does your organization conduct dark web searches for signs of a breach (internet protocol or customer/client personally identified information for sale)?

PFMI: n/a

AGC: 118

Yes

No

783 G25Q019

Is your organization aware of SWIFT's Customer Security Program (CSP)?

PFMI: n/a

AGC: 119

Yes

No

784 G25Q020

Does your organization ensure compliance with SWIFT's CSP controls?

PFMI: n/a

AGC: 120

Yes

No

785 G25Q021

Does your organization respond to requests for your institution's attestations?

PFMI: n/a

AGC: 121

Yes

No

786 G25Q022

Does your organization request the attestation details of your counterparties and incorporate the responses into ongoing relationship and risk management programs?

PFMI: n/a

AGC: 122

Yes

No

Appendices