

Ground Rules for the Management & Calculation of ATHEX ESG Index



ATHEXGROUP
Athens Exchange Group

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1. Introduction

1.1 Purpose of the Guidebook

Purpose of this guidebook is to describe the Ground Rules for the Management & Calculation of ATHEX ESG Index (Ground Rules).

1.2 Purpose of the Index

The purpose of the index is to monitor the performance of Athens Stock Exchange listed companies that stand out in adopting Environmental, Social and Corporate Governance practices (ESG).

The index is designed to:

- provide investors an efficient and transparent tool to integrate ESG practices into their investment strategy
- mobilize Athens Stock Exchange listed companies to disclosure all relevant information regarding the adoption of ESG practices and to undertake more initiatives in this area.

1.3 Index Characteristics

- 1.3.1 A maximum of sixty (60) securities that meet the eligibility criteria of the Ground Rules may participate in the composition of the index.
- 1.3.2 In the initial composition of the index only the securities that meet the eligibility criteria of the Ground Rules participate in the composition of the index.
- 1.3.3 The starting value of the index is 1,000 points, as at the close of Friday, July 31st 2021.

2. Use of the Indices and Disclaimer

2.1 Use of the Indices

- 2.1.1 The indices of ATHEX Stock Market monitor the performance of the securities of ATHEX listed companies that meet specific criteria in order to be eligible for inclusion in the composition of the indices.
- 2.1.2 The Benchmark Administrator considers that the appropriate use of the indices is for research purposes, for the comparative evaluation of returns or for the creation of financial products. This list is indicative, and users of the benchmark may use it for other purposes.

2.2 Disclaimer

- 2.2.1 The Benchmark Administrator informs the users of the indices that it is possible factors, including external factors beyond the control of the Benchmark Administrator to cause changes or even the cessation of index calculation and therefor any financial products or other instruments using the indices as reference should be able to handle the possibility of changes or even the cessation of index calculation.
- 2.2.2 The users who decide to use the indices as benchmarks or to purchase products that claim to track the performance of the indices, should evaluate the management & calculation methodology of the indices and get independent investment advice before investing funds of their own or of their clients.
- 2.2.3 The Benchmark Administrator (or any person engaged in the preparation or publication of the Ground Rules) shall not be liable for negligence or otherwise for any losses, damages, claims and expenses suffered by any person as result of:
- applying the Ground Rules or and
 - errors or inaccuracies in the Ground Rules or and
 - any non-application or incorrect application of policies and procedures described in the Ground Rules or and
 - any errors or inaccuracies in the composition of the indices or in any of its components.

3. Management Responsibilities

3.1 Athens Stock Exchange (ATHEX)

- 3.1.1 ATHEX is the Benchmark Administrator and is responsible for the daily operation of the indices.
- 3.1.2 ATHEX monitors all corporate actions and price changes and implements all constituent and weight changes to index composition.

3.2 ATHEX Index Oversight Committee

- 3.2.1 The ATHEX Index Oversight Committee consists of three (3) members and is responsible for the supervisory function of all aspects of the management and calculation of the indices.
- 3.2.2 The responsibilities of the Committee are:
- review of the benchmark's definition and methodology,
 - oversee any changes to the benchmark methodology,
 - oversee the administrator's control framework, the management and operation of the benchmark,
 - review and approve procedures for the cessation of the benchmark,
 - oversee the process of exercise discretion and judgment in case non-application in any of the rules,
 - assess internal and external audits or reviews, and monitor the implementation of identified remedial actions,
 - report to the relevant competent authorities any misconduct by the benchmark as well as any suspicious input data.

3.3 ATHEX Advisory Committee for the Management of Stock Market Indices

- 3.3.1 The ATHEX Advisory Committee for the Management of Stock Market Indices acts as a means of interaction between index users and other market stakeholders.
- 3.3.2 The Committee consists of the Chairperson, the Deputy Chairperson and its members. The Chairperson, and in his/her absence, the Deputy Chairperson, presides over the meetings and represents the Committee in all meetings with third parties.
- 3.3.3 The responsibilities of the Committee are to:
- discuss on issues related to the proper implementation of the Ground Rules
 - support of management functions of the indices

- comment on the eligibility of listed companies to participate in the composition of the indices
- propose changes in the Ground Rules, propose the creation of new and cessation of existing indices
- advise the ATHEX Index Oversight Committee on the handling of appeals

3.3.4 The committee meets regularly every six months and extraordinary when deemed necessary. The regular committee meetings are normally held the last week of May and November.

3.4 ATHEX Index Team (A.I.T.)

3.4.1 The A.I.T. is responsible for:

- the management, operation and maintenance of the process of management and calculation of the indices, implementing Ground Rules,
- carrying out index regular reviews according to the Ground Rules
- supporting the administrative work of the ATHEX Advisory Committee for the Management of Stock Market Indices.

3.4.2 A.I.T. presents at the periodic meetings of the ATHEX Advisory Committee for the Management of Stock Market indices the results of the indices regular review providing all necessary information.

3.4.3 A.I.T. maintains a schedule of corporate actions that take place between meetings of the ATHEX Advisory Committee for the Management of Stock Market Indices that may affect the calculation of index divisors.

3.4.4 A.I.T. maintains a record of all changes in the composition of indices and their divisors. Is also responsible for ensuring the prompt publication of all decisions concerning the management of the indices using all available means of Athens Stock Exchange.

3.4.5 A.I.T. is responsible for maintaining contacts with ATHEX listed companies on any matter relating to the participation of the companies in the composition of the indices.

4. Calculation of Free Float

4.1 Free Float

Shares in issue of the ATHEX listed companies must be publicly available for investment.

During the semi-annual review of the composition of the indices or when this is deemed necessary according to the Ground Rules share weights will be adjusted where cross-holdings exist or where free float is restricted.

4.2 Free Float Restrictions

4.2.1 Restricted free float includes:

- Shares directly owned by State, Regional, Municipal and Local governments. Shares held by independently managed pension schemes for governments are excluded.
- Shares held by directors, senior executives and managers of the company, and by their family and direct relations, and by companies with which they are affiliated.
- Shares held within employee share plans.
- Shares held by public companies or by non-listed subsidiaries of public companies.
- All shares where the holder is subject to a lock-in clause (for the duration of the clause¹).
- Shares held by an investor, investment company or an investment fund for strategic reasons as evidenced by specific statements to that effect in publicly available announcements, has an employee on the board of directors of a company, has a shareholder agreement, has successfully placed a current member to the board of directors or has nominated a current member to the board of directors alongside a shareholder agreement with the company.
- Shares that are subject to on-going contractual agreements (such as swaps) where they would ordinarily be treated as restricted.

4.2.2 Free float restrictions where holding is 10% or greater,

- Shares that are held by Sovereign Wealth Funds.
- Shares held by founders, promoters, former directors, venture capital and private equity firms, private companies, individuals (including employees) and shares held by several holders acting in concert.

The shares will remain restricted until the holding falls below 10%

¹ Free Float changes resulting from the expiry of a lock-in will be implemented at the next semi-annual review subject to the lock-in expiry date occurring on or prior to the share and float change information cut-off date.

4.2.3 Free float restrictions where holding is 30% or greater,

For clarity, portfolio holdings (such as pension fund, insurance fund or investment companies) are generally not considered as restricted. However, where a single portfolio holding is 30% or greater it will be regarded as strategic and therefore restricted. The shares will remain restricted until the holding falls below 30%.

4.3 Changes to Free Float

4.3.1 If in addition to the above restricted holdings, the company's shareholders are subject to legal restrictions, including foreign ownership restrictions, that are more restrictive, the legal restriction will be applied.

4.3.2 Free float restrictions will be calculated using available published information.

4.3.3 For equity shares of companies which have been admitted to the Index that have a free float greater than 15%, the actual free float will be rounded up to the next highest whole percentage number. Companies with a free float of 15% or below are not eligible for inclusion in the Index.

4.3.4 In the event that a company which is subject to restructuring under specific provisions such as receiving capital injection by way of an equity issue from the Government and or other agencies or bodies and the company's free float falls below the minimum requirement of 15% then the company should be accepted in the indices with its actual free float.

4.3.5 A constituent's free float will also be reviewed and adjusted, if necessary, following a corporate event. If the corporate event includes a corporate action which affects the index, any change in free float will be implemented at the same time as the corporate action. If there is not a corporate action, the change in free float will be applied as soon as practicable after the corporate event.

4.3.6 Following the application of an initial free float restriction, a constituent's free float will only be changed if its rounded free float moves to more than 3 percentage points above or below the existing rounded free float. Where a company's actual free float moves to above 99%, it will not be subject to the 3 percentage points threshold and will be rounded to 100%.

4.3.7 Nominee Accounts

Shares disclosed as being held by a nominee account are typically regarded as free float. However, if a restricted shareholder as defined in [par 4.2](#) is identified as holding shares through a nominee account then that portion of shares will be restricted.

5. Eligible Securities

5.1 Determination of Eligible Securities

- 5.1.1 Only one line of ordinary share with voting right of each listed company is eligible for inclusion in the composition of the index, as long as the other conditions defines in the Ground Rules are met.
- 5.1.2 Where multiple securities exist representing the same underlying economic asset – created as consequence of a takeover, restructure or other corporate transformation – then only a single security may participate in the composition of the index to represent the underlying asset.
- 5.1.3 In the event that, the entirety of a class of shares or part of a class of shares of a listed company has not been admitted to trading on ATHEX, the specific unlisted shares are not included in the selection process that will determine the composition of the index.
- 5.1.4 Convertible, preferred shares and convertible bonds are ineligible, until to be converted.
- 5.1.5 Eligible for participation in the index are the shares of companies trading in ATHEX Main Market.
- 5.1.6 Eligible for participation in the index are the shares of companies with actual free float – before rounding - greater than or equal to (\geq) 15%.

5.2 ESG Criteria

- 5.2.1 Listed companies on the Athens Stock Exchange are evaluated based on the level of transparency they exhibit regarding the indicators of the «ESG Information Disclosure Guide» according to the «ESG Transparency Methodology».
- 5.2.2 Each listed company receives a final score «ESG Transparency Score» which is used as input for the participation in the composition of the index.
- 5.2.3 Eligible for participation in the composition of the index are the shares of the companies with «ESG Transparency Score» greater than or equal to (\geq) 30%.

6. Periodic Review of Constituents

6.1 Determination of Index Composition

- 6.1.1 A database is created with all the securities listed on ATHEX Regulated Market classified by Market and Trading Category.
- 6.1.2 Securities that do not meet the criteria set out in [section 5](#) are excluded.
- 6.1.3 Eligible securities are ranked in descending order based on their final score, «ESG Transparency Score», which serves as the final criterion for participation in the composition of the index.
- 6.1.4 The first sixty (60) securities of the rank comprise the composition of the index. In case of a tie, the security with the highest Free Float Market Capitalization² is selected.
- 6.1.5 In the initial composition of the index, and until the maximum number of sixty (60) constituents is filled, only the securities that meet the criteria set out in [section 5](#) will be included in the composition of the index.

6.2 Calculation of Weight Factor

- 6.2.1 An alternative methodology is adopted to determine the weight of each security in the composition of the index. This is achieved by calculating a Weight Factor for each security in the composition of the index.
- 6.2.2 Weight Factor is calculated as the product of the free float, with which each security participates in the composition of the index, by the final score, «ESG Transparency Score», rounded to two (2) decimals.

6.3 Calculation of Capping Factors

- 6.3.1 The capping of securities in the composition of the index will be implemented semi-annually after the close of business on the 3rd Friday of June and December.
- 6.3.2 The calculation of Capping Factors will be carried out using security closing prices at the close of business on the 2nd Friday of June and December.
- 6.3.3 The capping process of the securities in the composition of the index is performed as follows:

² Free Float Market Capitalization as of the last trading day of the evaluation period

1. Securities with weight in the Index Market Capitalization greater than (>) 10% will be capped at 10%.
2. If the application of step (1) causes the weights of individual uncapped securities to be greater than (>) 10% then the securities will be capped at 10%.

6.4 Index Reserve List

- 6.4.1 With the announcement of the results of the index semi-annual review a new index reserve list is announced.
- 6.4.2 The reserve list consists of then (10) securities with the highest ranking according to the final score, «ESG Transparency Score», that do not participate in the composition of the index.
- 6.4.3 The reserve list will be used in the event that one or more securities must be removed from the composition of then index during the period up to the date of announcement of the results of the next semi-annual review.
- 6.4.4 In case of removal of a security from the composition of the index it will be replaced by the security with the highest ranking from the reserve list according to the final score, «ESG Transparency Score», if the security continues to be eligible for participation in the index.

7. Changes to Constituent Companies

7.1 Suspension of Trading

- 7.1.1 When ATHEX decide that a constituent must be suspended from trading, it may remain in the composition of the index, at the price at which it is suspended, for up to ten (10) business days.

During this time the constituent may be removed immediately from the composition of the index at zero price in case it is expected that the constituent will not recommence trading.

- 7.1.2 In the event that during the period of ten (10) business days the has not been lifted (and the possibility of removal from the composition of the index has not been exercised) then, under normal conditions, the constituent will be removed from the composition of the index before the start of business on the 21st day at zero price.

- 7.1.3 The vacancy in the composition of the index from the application of [par 7.1.1](#) & [par 7.1.2](#) will be filled according to [par 6.4](#) on the date of the removal.

- 7.1.4 In the event that during the period of three months from the removal of a constituent from the composition of the index, its suspension is lifted and its Market Capitalization is greater than the Market Capitalization of the constituent with the lowest Market Capitalization in the composition of the index, then the constituent will return to the composition of the index.

The number of securities in the composition of the index will be increased by one (1) until the next semi-annual review.

7.2 Deletion of Companies

- 7.2.1 When ATHEX decides to delete a company from the ATHEX Regulated Market and the securities of the company participate in the composition of the index, then the securities of the company are removed from the index.

- 7.2.2 The vacancy in the composition of the index will be filled according to [par 6.4](#) on the date of the removal.

7.3 Mergers, Acquisitions and other Complex Corporate Actions

- 7.3.1 If, due to a merger by absorption, a company participating in the composition of the index is absorbed by another company also participating in composition of the same index, then the resulting company remains in the composition of the index.

- 7.3.2 The vacancy will be filled according to [par 6.4](#) on the date of the removal.

- 7.3.3 If a company that participates in the composition an index is absorbed through a merger by another company that does not participate in the composition of the index, then the first is removed from the index and replaced by the second. If a company that participates in the composition of the index splits to form two or more companies, the company that will remain in the composition of the index is the one with the largest capitalization.

7.4 Changes in Trading Status

- 7.4.1 When ATHEX decides to transfer the trading of a security participating in the composition of the index to non-continuous trading status, then the company's securities are removed from the composition of the index.
- 7.4.2 The vacancy in the composition of the index will be filled according to [par 6.4](#) on the date of the removal.

8. Periodic Review of Constituents

8.1 Review Periods

8.1.1 The review of the composition of ATHEX ESG Index place semi-annually with the following evaluation periods:

- **A' Semi-Annual Review**, for the period 1st November until 30th April.
- **B' Semi-Annual Review**, for the period 1st May until 31th October.

8.2 Input Data

8.2.1 The input data for the review of the index includes the following:

- the composition of ATHEX Markets and Trading Categories
- the shareholders structure of ATHEX listed companies (free float)
- the Market Capitalization of each security
- the final score, «ESG Transparency Score», of each company according to the «ESG Transparency Methodology»

8.3 Announcement of Review Results

8.3.1 As soon as possible after completion of the meeting of the ATHEX Advisory Committee for the Management of Stock Market Indices the review results are announced publicly.

8.3.2 In the meantime (between the meeting ATHEX Advisory Committee for the Management of Stock Market Indices and the implementation date of the review results) a listed company may ask to review the participation or not in the composition of the index.

8.4 Implementation Periods

8.4.1 The changes in the composition of the index, following the results of their semi-annual review, are implemented after the close of business on

- 3rd Friday of June for the A' Semi-Annual Review
- 3rd Friday of December for the B' Semi-Annual Review

9. Changes – Exceptions to Index Ground Rules

The Ground Rules for the Management & Calculation of ATHEX ESG Index are subject to regular review (at least once a year) by the Benchmark Administrator to ensure that they best continue to reflect the aims of the ATHEX Index Series.

9.1 Changes in Index Ground Rules

- 9.1.1 Changes in the structure of the Ground Rules will be implemented gradually and not in a radical manner.
- 9.1.2 Changes in the Ground Rules are prepared by A.I.T. processed by ATHEX Advisory Committee for the Management of Stock Market Indices and proposed for approval by ATHEX Index Oversight Committee.
- 9.1.3 Changes in the Ground Rules that decided by the ATHEX Index Oversight Committee will be effective at the meeting of the ATHEX Advisory Committee for the Management of Stock Market Indices that will take place next semester. This limitation does not apply during the first application of the Ground Rules.

9.2 Ground Rules Exceptions

- 9.2.1 Exception to the Ground can be authorized only by ATHEX Index Oversight Committee after a recommendation by the ATHEX Advisory Committee for the Management of Stock Market Indices.

In case ATHEX Index Oversight Committee considers that an exception should be made to the Ground Rules, this should not be in contraction with the spirit of the Ground Rules and should properly documented.

- 9.2.2 Where an exception is granted to the Ground Rules, it shall not be deemed to create a precedent for future decisions of the ATHEX Index Oversight Committee.

10. Appeals

10.1 Appeals Against or Non-Participation in an Index

10.1.1 A company has the opportunity to appeal against the participation or not in the composition of the index only if A.I.T. has acted in violation of the Ground Rules.

10.1.2 The appeals should be send in written to the ATHEX Advisory Committee for the Management of Stock Market Indices and notified to the A.I.T..

A.I.T. should provide to ATHEX Advisory Committee for the Management of Stock Market Indices reasoning and documentation for the specific appeal.

10.1.3 ATHEX Advisory Committee for the Management of Stock Market Indices after examining the company's appeal and the reasoning and documentation by A.I.T. will draft a proposal for the handling by ATHEX Index Oversight Committee.

10.1.4 The draft proposal for the handling of a company appeals will be examined by the ATHEX Index Oversight Committee, which will decide on it.

11. Appendix A: Calculations

11.1 Calculation Time & Frequency

11.1.1 ATHEX ESG Index will be calculated every 30 seconds during the opening hours of ATHEX using real time prices for the constituents of the indices.

11.2 Index Price Display

11.2.1 The index is displayed to two decimal places.

11.3 Index Calculation Formula

11.3.1 Indices are calculated using the following formula:

$$P_t = \sum_{i=1}^n \frac{X_{i,t} * S_{i,t} * W_{i,t} * C_{i,t}}{D}$$

where:

- P_t Current Price of the Index
- $X_{i,t}$ The last trading price of a constituent as it comes from the trading system OASIS, or the closing price of the share after the close of business day in ATHEX
- $S_{i,t}$ The number of Outstanding Shares for each constituent
- $W_{i,t}$ Weight Factor for each constituent. Weight factor is calculated $\omega \varsigma F_i * E_i$ rounded in two (2) decimals

Where:

- F_i Free Float factor for each constituent. The free float factor is the free float of the company rounded to the highest integer
- E_i The final score, «ESG Transparency Methodology», of each constituent
- $C_{i,t}$ Capping Factor for each constituent
- D Index Divisor. The Index Divisor represents the Market Capitalization of the index at base date.

The Index Divisor is adjusted to enclose changes in the share capital of a company that participate in the composition of the index in order index price to remain unchanged.



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