WFC Single Disclosure Report 2025

AGC answers

Date submitted

23/10/2025 05:49:27

AGC: 0a
Please indicate the full name of the responding institution:

Greece- Hellenic Central Securities Depository (ATHEXCSD)

AGC: 0c
Registered address:

110 Athinon Avenue, 10442 Athens

AGC: 0d
Country of registered address:

Greece

AGC: 1

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?

- [x] Yes
- [ ] No

AGC: 1a
Please explain

AGC: 2
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:

- [x] Act as or operate a system for the central handling of securities or equivalent book-entries in the country where it is incorporated?
- [ ] Not applicable
- [ ] Act in another capacity with respect to the handling of securities or equivalent book-entries?
- [ ] Act as or operate a transnational system for the central handling of securities or equivalent book-entries?
- [ ] OTHER:

AGC: 2a.
Please explain:

AGC: 2b.
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:

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.

AGC: 3
What type of legal entity is the institution?

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

AGC: 4
Is the institution operated as a "for profit" or a "not for profit" organization?"

- (●) For profit
- ( ) Not for profit

AGC: 5
Please provide the names of the owners and their ownership interest percentages.

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 Stock Exchange. On 31 August 2025 ATHEX had approximately 9,500 shareholders. The breakdown by shareholder category is: International (i.e. non-Greek) investors 44.3%; Local retail investors 24.0%; Local institutional investors 18.5%; Local banks 5.6%; Treasury Stock 4.1%, ATHEX Members 1.0%; ATHEX Management Team 0.2%; Other 2.3%. There is one (1) shareholder with a stake of > 5%: PRAUDE ASSET MANAGEMENT. 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: https://www.athexgroup.gr/en/more-options/investor-relations/financial-reports

AGC: 6a

What is the date of establishment of the CSD?

Please enter the answer in DD/MM/YYYY format.

If you are filling the survey for more than one organization, please enter the name of each organization in different lines and in front of each one the corresponding date.

1991-02-22 00:00:00

AGC: 6b

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

Please enter the answer in DD/MM/YYYY format.

If you are filling the survey for more than one organization, please enter the name of each organization in different lines and in front of each one the corresponding date.

1991-02-22 00:00:00

AGC: 7
Under what regulation or statute is the CSD established and governed?

CSD is established under Regulation (EU) No 909/2014 of the European Parliament and of the Council of 23 July 2014 on improving securities settlement in the European Union and on central securities depositories and amending Directives 98/26/EC and 2014/65/EU and Regulation (EU) No 236/2012, implemented in Greek market under Articles 1 to 30 of Law 4569/2018 on "I) Central Securities Depositories, II) Transposition into Greek Legislation of the provisions of Council Directive (EU) 2016/2258 and other provisions, and III) Other provisions" (Government Gazette A 179 / 11.10.2018).

AGC: 7a
Is the regulation or statute electronically available?

- (selected) Yes
- No

AGC: 7b
If regulation or statute is electronically available, please supply web address(es) here or upload document(s).

https://search.et.gr/en/search-legislation/?legislationNumber=4569&selectYear=2018

AGC: 7c
filecount - Please supply document(s) here:

AGC: 7d
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?

Roles and responsibilities of Board Members are, at minimum, as provided from the CSDR regulatory framework and they are clearly specified at the ATHEXCSD's Internal Regulation.

Details of the structure and composition of ATHEXCSD Board as well as the function, roles and responsibilities of Board members can be found at the ATHEXCSD corporate site: https://www.athexgroup.gr/en/about/athexcsd, and at the company's articles of association:

https://www.athexgroup.gr/documents/10180/6050957/ATHEXCSD_Articles_of_Association_2020_10_27_EN.pdf/96512bb0-2a64-444a-9748-48914f6f8b43

AGC: 7e
What are the election procedures?

BoD election procedures can be found in article 10 of the company's articles of association:
https://www.athexgroup.gr/documents/10180/6050957/ATHEXCSD_Articles_of_Association_2020_10_27_EN.pdf/96512bb0-2a64-444a-9748-48914f6f8b43

AGC: 7f
What is the maximum length of time a board member can serve?

The term of the Board of Directors is three years and may be extended until the first ordinary General Meeting to convene after the expiry of its term. It can be found in article 8 of the company's articles of association: https://www.athexgroup.gr/documents/10180/6050957/ATHEXCSD_Articles_of_Association_2020_10_27_EN.pdf/96512bb0-2a64-444a-9748-48914f6f8b43

AGC: 7g
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)?

Each member of the BoD shall be entitled to one vote. In specific according to the article 13 par. 2 of company's articles of association which is consistent with Greek corporate law, the decisions of the Board of Directors are taken by an absolute majority of members present and represented unless otherwise provided by law or these Articles of Association. In the event of a tie in terms of votes, the vote of the Chairman of the Board shall not prevail. Kindly note that Board of Directors has a quorum and validly convenes when at least one half plus one of its members are present or represented, although the number of members present must never be less than three.

AGC: 7h
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?

ATHEX, as the sole shareholder of ATHEXCSD, has appointed joint members of the Board of Directors of the subsidiaries with its own members for reasons of synergies. In this context, the Nomination and Compensation Committee of ATHEX assesses ATHEXCSD members as well. Performance of the Board as a whole and of the individual board members is reviewed annually by ATHEX Board's Nomination and Compensation Committee.

Hellenic Capital Market Commission has the power to review the fit and proper requirements of the ATHEXCSD BoD members .

AGC: 8
Rule 17f-7 requires that an Eligible Securities Depository regulated by a foreign financial regulatory authority as defined under section 2(a)(50) of the Act, with section 2(a)(50) establishing that z 'foreign financial regulatory authority' means any (A) foreign securities authority, (B) other governmental body or foreign equivalent of a self-regulatory organization empowered by a foreign government to administer or enforce its laws relating to the regulation of fiduciaries, trusts, commercial lending, insurance, trading in contracts of sale of a commodity for future delivery, or other instruments traded on or subject to the rules of a contract market, board of trade or foreign equivalent, or other financial activities, or (C) membership organization a function of which is to regulate the participation of its members in activities listed above." Who regulates the activities of the CSD?

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

AGC: 8a.
Please explain:

AGC: 9
Please provide the name of regulatory authority(ies) identified in question 8:

Hellenic Capital Market Commission

AGC: 10
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:

- [x] Independent accountants?
- [x] Regulatory authorities?
- [ ] OTHER:

AGC: 10a
Please explain:

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

Hellenic Capital Market Commission

AGC: 11a.
What enforcement actions are available to regulatory authority #1 for breach of applicable statute or regulatory requirements?

- [ ] Termination of CSD activities.
- [ ] Suspension of CSD activities.
- [ ] Restrictions on CSD activities.
- [ ] Fines
- [x] OTHER: The enforcement actions that are available to regulatory authority escalate from a simple warning to all the above mentioned measures, depending on the level and the frequency of the event.

AGC: 11b.
Please explain:

AGC: 11c.
What enforcement actions are available to regulatory authority #2 for breach of applicable statute or regulatory requirements?

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

AGC: 11d.
Please explain:

AGC: 12
Has there been any use of such enforcement actions in the last three years?

- [ ] Yes
- [x] No
- [ ] OTHER:

AGC: 12a.
If yes, please explain:

AGC: 13
Capital. Are annual financial statements publicly disclosed?

- (●) Yes
- ( ) No

AGC: 13a.
If yes, the AGC requests a copy of the institution's annual report. Is the annual report available electronically?

- (●) Yes
- ( ) No

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

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

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

https://www.athexgroup.gr/en/about/athexcsd/statements

AGC: 13e.
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):

AGC: 13f.
Reserves (then please answer 13g):

AGC: 13g.
Retained Earnings:

AGC: 14
Internal Audit. Is an internal audit undertaken in your CSD?

- [x] Yes
- [ ] No

AGC: 14a.
If yes, what areas does the audit cover (financials, operations, etc.) and which department in your CSD handles it?

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

AGC: 14b.
Please list the date of your last internal audit and the period that the audit covered:

End date: 31/12/2024
Start date: 01/01/2024
Audit date: 31/03/2025

AGC: 14c.
How frequently does the internal audit occur?

- [ ] Two or more times a year
- [x] Annually
- [ ] Less than annually

AGC: 14d.
If less than annually, please explain:

AGC: 14e.
Are the results of the internal audit publicly available?

- [ ] Yes
- [x] No

AGC: 14f.
Please select the statement that most accurately characterizes the results of the last internal audit:

- [x] No material exceptions found.
- [ ] Minor exceptions found.
- [ ] Material exceptions found.

AGC: 14g.
If minor or material exceptions were found, what actions were taken? Please describe:

AGC: 15
Is a financial audit performed by an Audit Firm, Regulatory Authority, or other external party?

- [x] Yes
- [ ] No

AGC: 15a.
If yes, please state the name(s) of the entity(ies) who perform the financial audit.

Grant Thornton is the financial auditor of ATHEXCSD for year 2025.

AGC: 15b.
Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party:

31/12/2024

AGC: 15c.
Please list the period that the audit covered:

Start date: 01/01/2024
End date: 31/12/2024

AGC: 15d.
How frequently does the financial audit occur?

- [ ] Two or more times a year
- [x] Annually
- [ ] Less than annually

AGC: 15e.
If less than annually, please explain:

AGC: 15f
Are the results of the financial audit publicly available?

- [x] Yes
- [ ] No

AGC: 15g.
Please select the statement that most accurately characterizes the results of the last financial audit:

- [x] No material exceptions found.
- [ ] Minor exceptions found.
- [ ] Material exceptions found.

AGC: 15h.
If minor or material exceptions were found, what actions were taken? Please describe:

AGC: 16
Is an operational audit performed by an Audit Firm, Regulatory Authority, or other external party?

- [x] Yes
- [ ] No

AGC: 16a.
If yes, please state the name(s) of the entity(ies) who perform the operational audit.

IT Audits are conducted annually in collaboration with an external party. The last IT Audit was performed in 2024 by the external party SOLCROWE in collaboration with Athex Group Internal Audit Division covering year 2024.

AGC: 16b.
Please list the date of your last operational audit performed by an Audit Firm, Regulatory Authority, or other external party:

31/12/2024

AGC: 16c.
Please list the period that the audit covered:

Start date: 01/01/2024
End date: 31/12/2024

AGC: 16d.
How frequently does the operational audit occur?

- [ ] Two or more times a year
- [x] Annually
- [ ] Less than annually

AGC: 16e.
If less than annually, please explain:

AGC: 16f
Are the results of the operational audit publicly available?

- ○ Yes
- ● No

AGC: 16g.
Please select the statement that most accurately characterizes the results of the last operational audit:

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

AGC: 16h.
If minor or material exceptions were found, what actions were taken? Please describe:

AGC: 17, 17q
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?

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

AGC: 17a.
How many Bank participants are there currently? (then please answer 17b)

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

AGC: 17b, 17d
Please select the features included in the eligibility requirements for Banks.

- [ ] Financial Thresholds
- [ ] Regulatory Oversight
- [ ] Market Experience
- [x] OTHER: Rulebook of the Hellenic Central Securities Depository. Section II. Access to the DSS (Dematerialized Securities System) The Rulebook is published in our website

AGC: 17c.
Where can a description of the specific eligibility requirements for Bank participants be found?

AGC: 17d.
Please explain:

AGC: 17e.
How many Broker participants are there currently? (then please answer 17f)

27 brokers – members of ATHEX, either local or remote

AGC: 17f, 17h
Please select the features included in the eligibility requirements for Brokers.

- [ ] Financial Thresholds
- [ ] Regulatory Oversight
- [ ] Market Experience
- [x] OTHER: Rulebook of the Hellenic Central Securities Depository. Section II. Access to the DSS (Dematerialized Securities System) The Rulebook is published in our website.

AGC: 17g.
Where can a description of the specific eligibility requirements for Broker participants be found?

AGC: 17i.
How many Individual participants are there currently? (then please answer 17j)

AGC: 17j.
Please select the features included in the eligibility requirements for Individual participants.

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

AGC: 17k.
Where can a description of the specific eligibility requirements for Individual participants be found?

AGC: 17m.
How many Foreign Institution participants are there currently?

11 remote participants (Foreign Institutions), either Banks or Brokers.

AGC: 17n, 17p.
Please select the features included in the eligibility requirements for Foreign Institution participants.

- [ ] Financial Thresholds
- [ ] Regulatory Oversight
- [ ] Market Experience
- [x] OTHER: Rulebook of the Hellenic Central Securities Depository. Section II. Access to the DSS (Dematerialized Securities System) The Rulebook is published in our website (Rulebooks & Resolutions | ATHEX). 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

AGC: 17o.
Where can a description of the specific eligibility requirements for Foreign Institution participants be found?

AGC: 17q.
If you have selected "Other entities" above, please explain:

AGC: 17r.
Indicate how many "Other entities" are currently participants?

2

AGC: 17s, 17u
Please select the features included in the eligibility requirements for the participants referred to above as "Other entities".

- [ ] Financial Thresholds
- [ ] Regulatory Oversight
- [ ] Market Experience
- [x] OTHER: Rulebook of the Hellenic Central Securities Depository. Section II. Access to the DSS (Dematerialized Securities System). The Rulebook is published in our website

AGC: 17t.
Where can a description of the specific eligibility requirements for participants described above as "Other entities" be found?

AGC: 18
Are participants required to contribute capital to the CSD that would result in ownership of the CSD?

- ○ Yes
- ● No
- ○ Not applicable

AGC: 18a.
If yes, what fixed amount is required or what formula is used to determine the appropriate contribution level?

AGC: 19
Are prospective participants subject to an initial review and approval process regarding compliance with eligibility requirements?

- ○ Yes
- ○ No
- ○ Not applicable
- ● 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. 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 ATHEXCSD Rulebook.

AGC: 20
What governs the relationship between the CSD and the participants?

- [x] Relevant law and regulation
- [x] Standard participation contract
- [ ] Established terms and conditions of participation
- [x] Rules of the CSD
- [ ] Not applicable
- [ ] By-laws of the CSD
- [x] OTHER: Decisions no 1, no 2, no 9 and 14 of ATHEXCSD BoD "Standard participation agreement" referring to the access to and use of ATHEXCSD's Dematerialized Securities System. All Resolutions of the ATHEXCSD Board of Directors are available on our website

AGC: 20b
Provide a link to the rulebook.

https://www.athexgroup.gr/en/about/regulatory/athexcsd

AGC: 20a
Please explain:

AGC: 21
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 that 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.

- (•) Yes
- ( ) No
- ( ) Not applicable

AGC: 21a.
If no, other or not applicable, please explain:

AGC: 21b, 21c.
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.

- [ ] Relevant Law and Regulation
- [ ] Standard participation contract
- [ ] By-laws of the CSD
- [ ] Rules of the CSD
- [ ] Established terms and conditions of participation
- [x] OTHER: Decisions no 1, no 2, no 9 and 14 of ATHEXCSD BoD "Standard participation agreement" referring to the access to and use of ATHEXCSD's Dematerialized Securities System. All Resolutions of the ATHEXCSD Board of Directors are available on our website

AGC: 21d
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.

AGC: 22
How does the CSD notify participants of material changes to the conditions of participation?

- [ ] By press release
- [ ] By public announcement
- [x] By e-mail
- [ ] By telephone
- [ ] Not applicable
- [x] OTHER: All changes in the Rulebook of ATHEXCSD are published in the Government Gazette of the Greek State. Moreover, the Rulebook (Rulebooks & Resolutions | ATHEX) and all the Resolutions (Rulebooks & Resolutions | ATHEX) of ATHEXCSD, are published to our website.

AGC: 22a.
Please explain:

AGC: 23
Who enforces compliance with the CSD's conditions of participation?

- [x] The CSD
- [ ] Not applicable
- [x] The CSD's regulator
- [ ] The exchange
- [ ] OTHER:

AGC: 23a
Please explain:

AGC: 24
What enforcement actions are available to the enforcement authority?

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

AGC: 24a
Please explain:

Forward the case to the district attorney.

AGC: 25
Has there been any such enforcement actions in the last three years?

- (●) Yes
- ( ) No

AGC: 25a.
If yes, please explain, including information relative to any suspensions of CSD participants:

During 2022, ATHEXCSD's BoD imposed a fine to a Participant that resigned without having transferred their client assets to other CSD Participants as expected.

Additionally, in 2024, following the revocation of a license by the Hellenic Capital Market Commission for a Participant, the Board of Directors of ATHEXCSD imposed the measure of deleting the said Participant.

AGC: 26
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?

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

AGC: 26a.
Please name the other security types:

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

AGC: 27a. (i)
Please list the instrument types for which it is not compulsory by law to: (i)settle in your CSD

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)).

AGC: 27a. (ii)
(ii) safekeep in your CSD:

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 safekept by ATHEXCSD)).

AGC: 27b. (i)
Please list the instrument types for which it is not compulsory by market practice to: (i)settle in your CSD

AGC: 27b. (ii)
(ii) safekeep in your CSD:

AGC: 27 (part 1), 27c
For all instrument types eligible for settlement in your depository, please confirm if settlement is compulsory by law or compulsory by market practice, or both? (Choose all that apply.)

- [x] Yes by law for all instrument types (please answer 27a)
- [ ] Yes by law and by market practice, for all instrument types (please answer 27b)
- [ ] Yes by market practice for all instrument types (please answer 27b)
- [ ] OTHER:

AGC: 27 (part 2), 27c

For all instrument types eligible for safekeeping in your depository, please confirm if safekeeping is compulsory by law or compulsory by market practice, or both? (Choose all that apply.)

- [x] Yes by law for all instrument types (please answer 27a)
- [ ] Yes by market practice for all instrument types (please answer 27b)
- [ ] Yes by law and by market practice, for all instrument types (please answer 27b)
- [ ] OTHER:

AGC: 28 28a
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.

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

AGC: 28b.
Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) held in safekeeping within your institution.

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

AGC: 29, 29i
Are there any settlement/operational activities performed by a third party on behalf of the depository for the depository participants?

- ( ) Yes (please answer 29a)
- ( ) No

AGC: 29, 29i
Select all applicable

- [ ] Entitlement processing
- [ ] Vaulting of physical securities
- [ ] Registration
- [ ] OTHER:

AGC: 29a.
If third parties are employed, please indicate which services they supply:

AGC: 29b.
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?

- ( ) Yes
- ( ) No

AGC: 29c, 29e.
If you acknowledge responsibility, please indicate whether your responsibility is assumed

- [ ] 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
- [ ] 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 the loss was caused by the willful default or other willful conduct on the part of the agent
- [ ] OTHER:

AGC: 29f.
Please specify limit:

AGC: 29g.
Please specify limit:

AGC: 29d, 29h.
If you acknowledge responsibility for agents, your responsibility is assumed for losses

- [ ] 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:

AGC: 30, 30m

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

- ( ) Yes
- (x) No
- ( ) Not applicable

AGC: 30a, 30j
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.

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

AGC: 30b.
Corporate Action. Please specify number of instances:

AGC: 30c.
Corporate Action. Please specify total loss in USD:

AGC: 30d.
Settlement Process - Securities. Please specify number of instances:

AGC: 30e.
Settlement Process - Securities. Please specify total loss in USD:

AGC: 30f.
Settlement Process - Cash. Please specify number of instances:

AGC: 30g.
Settlement Process - Cash. Please specify total loss in USD:

AGC: 30h.
System Outage. Please specify number of instances:

AGC: 30i.
System Outage. Please specify total loss in USD:

AGC: 30k.
For Other, please specify number of instances:

AGC: 30l.
For Other, please specify total loss in USD:

AGC: 31, 31b
Who accepts cash deposits (or makes payment credit accommodations) for CSD transactions?

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

AGC: 31a
Please indicate the name of the banks appointed by the CSD

AGC: 32
Who processes cash clearing (or draws on credit lines, if applicable) for CSD transactions?

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

AGC: 32a
Please name banks appointed by the CSD

AGC: 33, 33b
Who manages the movement of cash for cash deposits (or draws on credit lines, if applicable)? (Choose all that apply.)

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

AGC: 34, 34b
Who manages the movement of cash for cash clearing (or for draws on credit lines, if applicable)? (Choose all that apply.)

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

AGC: 34a
Please name banks appointed by CSD

AGC: 35
Please indicate services you provide.

- [x] 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.
- [ ] Not applicable
- [x] Information on distribution of new issues (IPO, Privatization).
- [x] Same day turnaround settlements.
- [x] Collateral handling in support of activities including securities lending, overdraft coverage, cash management,repurchase agreements, etc.
- [x] In order to avoid fails, an automatic securities lending facility - if requested - is provided for.
- [x] 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

AGC: 35a
Automatic securities lending facility is provided for:

- [ ] Banks
- [x] Brokers
- [ ] Other financial institutions
- [ ] OTHER:

AGC: 35c
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.)

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.

AGC: 35c
If collateral handling, please provide details

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.

AGC: 35d
Other, please explain:

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

AGC: 36
What procedures are in place for the processing of corporate action entitlements?

- [x] 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:

AGC: 36a
Credited to the securities account:

- [ ] On pay date +2.
- [ ] On pay date +1.
- [x] On pay date.
- [ ] OTHER:

AGC: 36c
Name of entity:

AGC: 37a
Credited to the cash account:

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

AGC: 37c
Name of entity:

Banks acting as paying agents appointed by the issuers.

AGC: 37, 37d.
What procedures are in place for the processing of interest and dividends?

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

AGC: 38
Please list all depositories or settlement systems to which you have an electronic link (note: this excludes institutions where you only hold accounts without further system linkage).

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

AGC: 39
Are procedures and controls in place to avoid systemic collapse or contamination if one of the depositories and settlement systems should experience business interruptions for whatever reason?

- [ ] No
- [x] Yes
- [ ] Not applicable

AGC: 39a
Please explain

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

AGC: 40
Has a business interruption recovery plan been developed in the event the linkages should become inoperable for any reason?

- (●) Yes
- ( ) No
- ( ) Not applicable
- ( ) Other

AGC: 40a.
If no or other, please explain

AGC: 41
Are participants permitted to maintain more than one account at the CSD?

- ○ Yes
- ○ No
- ○ Not applicable
- ● Other: According to the provisions of AthexRulebook Section III Part 4.2, 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)

AGC: 41a, 41c
If yes, please indicate number:

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

AGC: 41b
If more than one account what is the maximum?

AGC: 42
Are participants required/permitted to segregate assets held for their own benefit from those they hold for their clients?

- [ ] Not applicable
- [ ] No
- [x] Yes
- [ ] OTHER:

AGC: 42a
If yes, is segregation required or simply permitted?

- ● Required
- ○ Permitted

AGC: 42b, 42c
How does segregation occur?

- [x] Segregated (By separately designated beneficial owner accounts.)
- [ ] Omnibus with sub account (By sub-accounts within a single participant account.)
- [ ] Omnibus (By separately designated participant accounts.
- [ ] OTHER:

AGC: 43, 43b

Is the nominee account concept being recognised in your market?

- [x] Yes
- [ ] No
- [ ] Not applicable

AGC: 43a

If yes, does the depository permit its participants to open accounts in the participant's own nominee name(s)?

- [x] Yes
- [ ] No

AGC: 44a

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?

- [x] Yes
- [ ] No

AGC: 44b

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:

The Dematerialised Securities System of ATHEXCSD provides for individual and omnibus account segregation structure. All Security Accounts maintained in the DSS are administered by Participants. In the event of a Participant's insolvency pursuant to the provisions of par. 6, article 30, Law 4569/2018 or the suspension or deletion of a Participant pursuant to par. 2, article 1.1, Part 1, Section XI of ATHEXCSD Rulebook, where a Participant's main account is blocked, a Provisional Transfer Account is opened by ATHEXCSD. The Provisional Transfer Account is opened in the Share of a beneficiary or Registered Intermediary, as applicable, in which the insolvent Participant has a Securities Account, and it is maintained by ATHEXCSD. ATHEXCSD transfers the Securities from the Securities Account of the aforesaid Participant, which is maintained in the Share of the beneficiary or Registered Intermediary, to the Provisional Transfer Account upon notification to it of the relevant insolvency measure and temporary transfer in accordance with the provisions of par. 6, article 30, Law 4569/2018. The Provisional Transfer Account is terminated upon transfer of the relevant Securities to other Securities Accounts as directed by the beneficiary or Registered Intermediary, as applicable, or a Participant acting on their behalf or in execution of the relevant forced sale transactions of par. 6, article 30, Law 4569/2018.

AGC: 44d.

By the intervening authorities controlling insolvency or other proceedings?

- [x] Yes
- [ ] No

AGC: 44e.

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

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.

AGC: 44h

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

AGC: 44g, 44i
By the participant's creditors?

- ( ) Yes
- ( ) No

AGC: 44j.
By the CSD's creditors?

- ( ) Yes
- ( ) No

AGC: 44k.
If yes, please describe briefly under what conditions access would be granted to the CSD's creditors:

AGC: 45
In what form does the CSD maintain records identifying the assets of each participant?

- [ ] Hard copy
- [x] Computer file
- [ ] OTHER:

AGC: 45b
In which format is the source data maintained?

ATHEXCSD's database files and backup archives

AGC: 46
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?

- (•) Yes
- ( ) No

AGC: 46a.
If no or other, please explain

AGC: 46b, 46c.
If yes, please indicate the scheduled frenquency:

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

AGC: 47, 47a
What is your document and record retention policy for documents and records described above in this section?

- ○ 6 months or less
- ○ 1 year
- ○ 3 years
- ○ 5 years
- ○ 7 years
- ○ 10 years
- ● Other: As stated in Rulebook of the Hellenic Central Securities Depository Section I, Part 2, ATHEXCSD maintains historical data on trades and transactions for a period of 10 years.

AGC: 48
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.

- [ ] Not applicable
- [ ] Model3
- [x] Model2
- [x] Model1
- [ ] OTHER:

AGC: 48a
Please briefly describe your settlement process, including how do your settlement procedures vary from the model chosen above?

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.

AGC: 49
Are the cash and security movements simultaneous (i.e. immediately with no time gap)?

- ● Yes
- ○ No
- ○ Not applicable

AGC: 49a
If cash and security movements are not simultaneous, please indicate the duration of the timing gap

- ○ 1 hour
- ○ 2 hours
- ○ 3 hours
- ○ 4 hours
- ○ 5 hours
- ○ Overnight
- ○ 2 days

AGC: 50, 50a
How are CSD eligible securities held by the CSD?

- [x] In dematerialized form
- [ ] In certificated form
- [ ] OTHER:

AGC: 51
If CSD eligible securities are certificated, can CSD eligible securities be held outside of the CSD?

- ( ) All eligible securities must be held in the CSD
- ( ) Securities may move freely into and out of the CSD
- ( ) Once entered into the CSD, eligible securities must remain in the CSD
- ( ) Certain designated securities may be held outside the CSD
- (•) Not applicable

AGC: 51a
If certain designated securities are held outside the CSD, please indicate under which conditions these securities would be held outside the CSD:

AGC: 51b
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)

AGC: 51c
Are these certificates:

- [ ] Bearer
- [ ] Registered
- [ ] OTHER:

AGC: 51d
If registered, how are the CSD eligible securities registered?

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

AGC: 51f
If in the name of a separate nominee, please identify by name the nominee used:

AGC: 51h
If CSD eligible securities may be held either in or out of the CSD, are these certificates:

- ( ) Bearer
- ( ) Registered

AGC: 51i
What are the control features for receipt of certificates to the CSD (e.g., authentication procedures, re-registration)? Please describe:

AGC: 52
If securities are dematerialized: May dematerialized security positions be re-certificated and held outside the CSD?

- ○ Yes
- ○ No
- ○ Not applicable
- ● Other: Only if a company is deregistered from the CSD.

AGC: 52a, 52k
Are the securities held:

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

AGC: 52b
Please identify which types of entities may act as registrars:

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

AGC: 52d
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?

- ○ Yes
- ○ No
- ● Other: 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 either in individual accounts simultaneously with registry or in omnibus accounts under Participants' authority and responsibility.

AGC: 52e
If yes, how are securities held at the registrar for the account of the CSD?

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

AGC: 52f
Please describe:

AGC: 52g
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:

- ○ The beneficial owner
- ○ A nominee

AGC: 52h
Please describe:

AGC: 52i
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:

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 or in omnibus accounts. Settlement and registry at beneficiary owners level is simultaneous, and at omnibus accounts is under participant's authority and responsibility.

AGC: 53

Rule 17f-7 requires that an Eligible Securities Depository "maintains records that identify the assets of eah participant and segregate the system's own assets from the assets of participants."

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

- [ ] Not applicable
- [ ] No
- [x] Yes
- [ ] OTHER:

AGC: 53a
If answer to question ‘G23Q031’ is other or not applicable, please explain

AGC: 54
Does the law protect participant assets from claims and liabilities of the CSD?

- ● Yes
- ○ No
- ○ Not applicable

AGC: 55
Can the depository assess a lien on participant accounts? A lien would entitle the depository to take and hold or sell the securities of the participant in payment of a debt. (Choose all that apply.)

- ○ Yes, for proprietary accounts (please answer 55a)
- ● No
- ○ Yes, for client designated accounts (Please answer 55b)

AGC: 55a

If yes, for what reasons are liens or similar claims imposed for proprietary accounts? (Choose all that apply.)

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

AGC: 55b

Please describe:

AGC: 55c

Please describe highlighting any difference in approach between proprietary and client designated accounts.

AGC: 55d

Please indicate the limits of this lien as indicated below: (Choose all that apply.)

- [ ] Liens are limited to securities in the course of purchase and sale transactions, but do not extend to settled positions.
- [ ] Clients fully settled positions are protected from placement of Liens other than where there is a court order.
- [ ] Other (please answer 55g)

AGC: 55e

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?

- ○ Yes
- ● No

AGC: 55f

If yes, please indicate whether:

- ○ The lien is placed on the most liquid securities in the account
- ○ The lien is placed on the securities with the greatest value in the account
- ○ The lien can only be placed for the securities/trades in question

AGC: 55g

Please explain:

AGC: 55h

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

- ○ Yes
- ● No

AGC: 55j
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?

- ○ Yes
- ● No

AGC: 55k
If yes, are the restrictions accomplished by:

- ○ Contract between the CSD and the participant

AGC: 55l
Please explain:

AGC: 56, 56e
Transfer of Legal Ownership. Does the CSD have legal authority to transfer title to securities?

- ● Yes
- ○ No
- ○ Not applicable

AGC: 56a
When does title or entitlement to CSD securities pass between participants?

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

AGC: 56b
Please describe:

AGC: 56c
Where does title or entitlement to CSD securities pass between participants?

- ● On the CSD books
- ○ On the registrars books

AGC: 56d
Please describe:

AGC: 57, 57a
How are eligible securities lodged in the CSD system?

- [ ] 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 registered certificate in the name of the CSD is delivered to the CSD.
- [ ] A registrar re-registers the security in the name of the CSD.
- [ ] Not applicable
- [x] OTHER: The issuer submits a file to ATHEXCSD that includes the quantity of securities to be recorded to the securities accounts

AGC: 58, 58a
When are securities lodged into the CSD reflected in a participant's CSD account?

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

AGC: 59a
Please specify

AGC: 59, 59b
How long does it usually take to lodge securities with the CSD?

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

AGC: 60
During the process of lodging securities into the CSD, can the securities be traded?

- ( ) Yes
- (•) No
- ( ) Not applicable

AGC: 60a
During the process of lodging securities into the CSD, can the securities be settled?

- ( ) Yes
- (•) No
- ( ) Not applicable

AGC: 60b
During the process of lodging securities into the CSD, can the securities have ownership transferred?

- ○ Yes
- ● No
- ○ Not applicable

AGC: 60c
If they cannot be traded, or if you answered other, please explain

AGC: 60d
If they cannot be settled, or if you answered other, please explain

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).

AGC: 60e
If ownership cannot be transferred, or if you answered other, please explain

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).

AGC: 61a
If no: Securities are unavailable for

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

AGC: 61b
If more than 4 weeks, please specify

AGC: 61c
If not applicable, please explain

AGC: 61, 61d
Are securities immediately available for delivery upon transfer to the CSD?

- ○ Yes
- ● No
- ○ Not applicable

AGC: 62
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.

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

AGC: 63, 63a
What transfer process steps are involved when eligible securities are withdrawn from the CSD for safekeeping?

- ○ Securities are re-registered into the name of the beneficial owner or a nominee.
- ○ Securities are re-certificated and re-registered into the name of the beneficia
- ○ Securities are re-certificated and delivered as bearer instruments.
- ○ Securities are transferred as is any physical delivery in the market.
- ○ Not applicable
- ● Other: A security may be removed from the depository. The issuer is responsible to re-certificate the securities based on information received by ATHEXCSD or to issue securities in physical form.

AGC: 64a
If more than 4 weeks, please specify

AGC: 64, 64b
How long does it usually take to remove securities from the CSD?

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

AGC: 65a
While the securities are being removed from the CSD, can they be traded? (Choose one)

- ● No
- ○ Not applicable
- ○ Yes

AGC: 65b
If they cannot be traded please explain

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

AGC: 65c
While the securities are being removed from the CSD, can they be settled? (Choose one)

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

AGC: 65d
If they cannot be settled, please explain

AGC: 65e
While the securities are being removed from the CSD, can they have ownership transferred? (Choose one)

- ○ No
- ○ Not applicable
- ● Yes

AGC: 65f
If ownership cannot be transferred, please explain

AGC: 66, 66a, 66d
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?

- ● No
- ○ Not applicable
- ○ Yes

AGC: 66b 66c
If yes, please check all of the following that apply:

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

AGC: 66e, 66g, 66h
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?

- ○ No
- ● Yes
- ○ Not applicable

AGC: 66f
If yes, please check all of the following that apply:

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

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

- (●) No
- ( ) Yes
- ( ) Not applicable

AGC: 66j, 66k
If yes, please check all of the following that apply:

- [ ] 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:

AGC: 66m, 66p.
Any direct damages or losses to participants caused by the CSD due to its errors, omissions or fraud?

- [x] Yes
- [ ] No
- [ ] Not applicable
- [ ] OTHER:

AGC: 66n.
If yes, please check all of the following that apply:

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

AGC: 66q.
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?

- ( ) Yes
- (●) No
- ( ) Not applicable

AGC: 66r.
If yes, please check all of the following that apply:

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

AGC: 66u.
Does the CSD guaranty settlement?

- (x) No
- ( ) Yes
- ( ) Not applicable

AGC: 66v.
Please explain how this is accomplished. What are the procedures and safeguards that permit the CSD to guaranty settlement?

AGC: 66x.
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.?

- ( ) Yes
- (x) No
- ( ) Not applicable

AGC: 66y.
If yes, please check all of the following that apply:

- [ ] 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:

AGC: 66+
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?

- ( ) Yes
- ( ) No
- (x) Not applicable

AGC: 66*
Please define the standard of care applied:

AGC: 67a, 67b.
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?

- [ ] Not applicable
- [ ] Yes
- [x] No
- [ ] OTHER:

AGC: 67b.
Please explain (then please answer 67c):

AGC: 67c.
Please provide details of the relevant sections of the contracts, rules or practices where this information is found

AGC: 67d.
Insurance

- [ ] Not applicable
- [ ] No
- [x] Yes
- [ ] OTHER:

AGC: 67e.
Please explain (then please answer 67f):

ATHEX GROUP carries insurance coverage against a variety of potential threats including claims for errors, omissions malfeasance, etc, amounting to a total of about €128,517,603.05. Specifically: 1) D&O Coverage totals €50,000,000 per case, aggregate per year. (€10,000,000 plus €40,000,000 coverage in excess of €10,000,000, with deductible per case €30,000 for Securities retention and €50,000 for all other claims. 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: €23,189,313; deductible per case: i) Political Risks and terrorist 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) Landslide/Subsidence: 2% of the covered capital for every damage vi) 10% of the covered capital for every other damage (min €750). 4) General Public Liability & Employer Liability: €5,000,000 maximum aggregate amount common for all below coverages: • General Public Liability: Limit of €2,000,000 per case with deductible €3,000 per case due to terrorism, €1,000 any other claim • Employer's Liability: Limit of liability per person: €1,000,000, with deductible €3,000 per case due to terrorism and €500 for any other claim 5) Financial Loss: a) limit of €6,000 for cash in transit 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, with zero deductible. 5) Electronic equipment coverage: €8,282,290.05 inclusive of the use of an Information processing system substitute. 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) v) The first three (3) days from the rent in case use of an Information processing system substitute 6) Cyber Risk coverage (includes Data Protection & Cyber Liability, Event Management, Cyber Extortion and Network Interruption, excluding PCI–DSS Assessment): €7,000,000.00. Deductible: €100,000, 12 hours for Network Interruption, 24 hours for OSP for security and system failure.

AGC: 67f.
Please provide details of the relevant sections of the contracts, rules or practices where this information is found

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

AGC: 67g.
Acknowledgement of liability for losses caused by CSD's own actions.

- (●) Yes
- ( ) No
- ( ) Not applicable

AGC: 67h.
Please explain (then please answer 67i):

Covered by the insurance mentioned above, under AGC 67e.

AGC: 67i.
Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

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

AGC: 67j.
Other

- ○ Yes
- ● No

AGC: 67k.
Please explain (then please answer 67l:

AGC: 67l.
Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

AGC: 68
Is the CSD immune from legal action in its own jurisdiction?

- ○ Yes
- ● No

AGC: 69
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?

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

AGC: 69a.
Please explain:

AGC: 70
Do participants have access to affect their holdings, including confirming and affirming trades, movement of securities on their accounts, etc.?

- ● Yes
- ○ No
- ○ Not applicable

AGC: 70a.
How is access given to participants?

- [x] By direct electronic link
- [ ] OTHER:

AGC: 70b.
Please select type of electronic link:

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

AGC: 70c.
Please explain:

AGC: 71 71a.
Regarding data security: Are passwords used by participants to access their accounts?

- (•) Yes
- ( ) No
- ( ) Not applicable

AGC: 71c.
Does each user have a unique user ID?

- (•) Yes
- ( ) No
- ( ) Not applicable

AGC: 71e.
Are passwords regularly changed?

- (•) Yes
- ( ) No
- ( ) Not applicable

AGC: 71f.
How often?

At users' initiative but at least once per 90 days

AGC: 71h.
Is there a user lock-out after a pre-set number of unsuccessful User ID attempts?

- (•) Yes
- ( ) No
- ( ) Not applicable

AGC: 71i.
How many?

3

AGC: 72
Does the CSD communicate with other market entities such as stock exchanges, payment systems, clearing houses, etc., by secured linkages?

- [x] Yes
- [ ] No
- [ ] Not applicable

AGC: 72a
Please explain:

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, Target: cash settlement via SWIFTNet, Alpha Bank: FX cash settlement via secured, leased, dedicated line, Clearstream: Investor CSD Link via SWIFTNet, SIX SIS: Investor CSD Link via SWIFTNet.

AGC: 73 73a
How does the CSD communicate with Stock Exchanges?

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

AGC: 73b
How does the CSD communicate with Payment Systems?

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

AGC: 73c
How does the CSD communicate with Clearing Houses?

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

AGC: 73d
How does the CSD communicate with Registrars?

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

AGC: 74
How is access to the physical building controlled?

- [x] By alarm system
- [x] personal ID card
- [x] By electronic keys
- [x] By guards
- [x] 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.

AGC: 74a.
Please explain:

AGC: 75
What are the vault security procedures for the safekeeping of physical paper?

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

AGC: 75a.
Please indicate frequency of vault counts:

AGC: 75b
Please explain:

AGC: 76, 76d
Participant Default Protections Resulting from a Participant Failure. If a participant defaults, how is the loss covered? (Choose all that apply?)

- [ ] CCP covers the loss
- [ ] The depository guaranty fund covers the loss
- [ ] Depository insurance covers the loss (please answer 76a)
- [ ] Loss is shared among participants (please answer 76b)
- [x] Other/Not applicable (please answer 76d)

AGC: 76a
Please explain the process:

AGC: 76b
Please explain the process of how the loss is shared:

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

AGC: 76d
Please explain:

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.

AGC: 77
During the past three years, has there been a situation where a participant defaulted which resulted in a significant loss?

- ○ Yes
- ● No
- ○ Not applicable

AGC: 77a
How was the situation resolved? Or if you answered "Other," then please explain:

AGC: 78
Does the CSD have a guaranty fund independent of stock exchange or other market guarantees?

- ○ Yes
- ○ No
- ● Not applicable

AGC: 78a.
If yes, please respond to the following questions: What is the size of the fund?

AGC: 78b.
How is the size of the fund determined?

- By participant volume
- By asset value
- A fixed amount

AGC: 78d.
How is the fund financed?

- Contributions from owner
- Contributions from participants
- Funding from retained earnings

AGC: 78e.
If so, what is the amount or percentage per owner?

AGC: 78f.
If so, what is the amount or percentage per participant?

AGC: 78h.
Who is covered by the fund?

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

AGC: 78j.
When is the guaranty fund used?

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

AGC: 79
Does the depository have forms of oversight management for assessing and monitoring of the following? (Choose all that apply.)

- [ ] Debit caps for participants
- [x] Participant financial strength
- [x] Participant eligibility requirements
- [x] Participant volumes
- [x] Other loss or default protections the CSD maintains
- [ ] Not applicable (please answer follow up question)
- [x] Settlement controls that minimize or eliminate the risk of default by a participant
- [ ] Collateral requirements for participants
- [ ] Blocking of securities movement before receipt of payment
- [x] Blocking payment until securities are moved
- [x] OTHER: CSD is licensed to operate under CSDR provisions. it covers therefore all provisions of oversight management imposed by the regulation.

AGC: 79
Please provide the risk management framework (it can be a link or attachment at the end of this section)

AGC: 79a
Please explain other loss or default protections:

AGC: 79a
Please explain other loss or default protections:

AGC: 79b
Please explain the requirements:

AGC: 79c
Please explain how these debit caps work:

AGC: 79d.
What type or types of settlement controls

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

AGC: 79e.
Please explain:

AGC: 79f.
Please explain:

Utilizing limits for settlement.

AGC: 79g.
Please explain:

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

AGC: 79h
Please identify and explain:

AGC: 79i
Please explain briefly how these work:

AGC: 80
Does the stock exchange have default protections that extend to the CSD, such as the following?

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

AGC: 80a
Please explain:

AGC: 81
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?

- (●) Yes
- ( ) No

AGC: 81b part 1.
Please identify the frequency of testing for the following third party:
- Depository participants/members

Tests are conducted on a yearly basis. The last date of testing with Member participation was, on June 17 th 2024.

AGC: 81b part 2.
Please identify the last date of testing for the following third party:
- Depository participants/members

17/06/2024

AGC: 81c part 1.
Please identify the frequency of testing for the following third party:
- Stock exchange

Not applicable

AGC: 81c part 2.
Please identify the last date of testing for the following third party:
- Stock exchange

AGC: 81d part 1.
Please identify the frequency of testing for the following third party:
- Central bank

Not applicable

AGC: 81d part 2.
Please identify the last date of testing for the following third party:
- Central bank

AGC: 81e part 1.
Please identify the frequency of testing for the following third party:
- Local brokers

Tests are conducted on a yearly basis. The last date of testing with Member participation was, on June 17th 2024.

AGC: 81e part 2.
Please identify the last date of testing for the following third party:
- Local brokers

The last date of testing with Member participation was, on June 17th 2024.

AGC: 81f part 1.
Please identify the frequency of testing for the following third party:
- Any other third party

Not applicable

AGC: 81f part 2.
Please identify the last date of testing for the following third party:
- Any other third party

AGC: 81a, 81h.
Does your Business Recovery Plan include:

- [x] Off-site operations facility
- [ ] Digital/electronic signing of documentation
- [ ] Remote working ability
- [x] Back-up files stored and locked
- [x] Off-site data storage
- [x] Back-up of all computer files
- [x] 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 network infrastructure 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 is constantly checked every day in the primary and secondary site. The DR site of ATHEX is established in 2013, located away from the primary site and in a different earthquake and flood zone, with the capability to host adequate personnel to perform key operations for the period required to recover the main building and data centers from the disastrous incident. Moreover, ATHEXGroup has implemented an Active-Active architecture, that refers to a network of independent processing nodes, interconnected in a way to provide high availability of the offered technology services. The main purpose of an Active-Active cluster is to achieve load balancing, resulting in the distribution of the workload across all nodes, with an effect of noticeable improvement in throughput and response times. Active-Active architecture offers, among others, a significant improvement of the availability of information systems, a reduction or elimination of interruptions in the provided technological services, as well as the provision of fast and reliable recovery in the event of an interruption of operation due to a disaster (Disaster Recovery mechanism). In the above context, the specific architecture has been implemented since the end of 2021 in the IT environment of the Athens Stock Exchange Group (in the Primary Data Center on Athens Avenue, but also in the alternative (Disaster Recovery) IT Center), providing a very short transition time of the IT systems between Primary and DR site and at the same time a significant increase in the availability of the provided technological services in real operating conditions. ATHEXGroup performed a successful BC Test including the usage of the DR site, with Member participation, in June of 2024. Moreover, ATHEXGroup have had their Business Continuity Management System accredited with ISO22301:2019 for all the companies of the group and the offered products and services.

AGC: 82
How quickly can the main system be reactivated in the event of an outage?

- [x] 1 - 4 hours
- [ ] 4 - 8 hours
- [ ] 8 - 24 hours
- [ ] Longer than 24 hours
- [ ] Not applicable

AGC: 83
If a back-up system exists, how quickly can the back-up system be activated in the event of the main system failing?

- [x] 1 - 4 hours
- [ ] 4 - 8 hours
- [ ] 8 - 24 hours
- [ ] Longer than 24 hours
- [ ] Not applicable

AGC: 84
Will the CSD publicly announce any system interruption?

- [x] Yes
- [ ] No
- [ ] Not applicable

AGC: 84a.
To whom will the CSD disclose any system interruptions?

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

AGC: 84b.
If so, please list webpage address:

https://www.athexgroup.gr/en

AGC: 84c.
If so, please list all publications:

AGC: 84d.
Please explain:

AGC: 84e.
How will the CSD disclose any system interruptions?

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

AGC: 84f.
Please explain:

AGC: 85
In the past three years, has it been necessary to activate the recovery plan in a live situation?

- ( ) Yes
- (•) No
- ( ) Not applicable

AGC: 85a.
If yes, how much time was needed to implement the recovery plan?

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

AGC: 85b.
How much time was needed to recover and restore business to normal operations?

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

AGC: 85c, 85d.
What was the impact to the market?

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

AGC: 86
Has there been any material loss by the CSD during the past three years?

- ( ) Yes
- (•) No
- ( ) Not applicable

AGC: 86a.
If there has been a loss, please describe the cause, the final impact and the action taken to prevent a recurrence:

AGC: 87
Has the CSD been subject to any litigation involving a participant during the past three years?

- ( ) Yes
- (•) No
- ( ) Not applicable

AGC: 87a.
Please explain the circumstances and resolution:

AGC: 88, 88a
Has the CSD realized revenues sufficient to cover expenses during the past three years?

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

AGC: 89, 89b
Does the CSD maintain a reserve for operating losses?

- ○ Yes
- ○ No
- ○ Not applicable
- ● Other: According to the financial data until 30/06/2025, ATHEXCSD has formed total reserves of EUR 14.64 million

AGC: 89a.
Please describe and indicate reserve (for operating losses) amount:

AGC: 90
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?

- ○ Yes
- ● No
- ○ Not applicable

AGC: 90a.
Please describe:

AGC: 90b.
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?

- ○ Yes
- ○ No
- ● Other: Not applicable.ATHEXCSD has not received any public notice by Hellenic Capital Market Commission or any other regulatory body for non-compliance with capital, solvency, insurance or similar financial strength requirements. Thus, we assume that question 90b is not applicable to ATHEXCSD

AGC: 90c.
If yes, please describe:

AGC: 90d.
If no, why not?

AGC: 91

Please confirm whether you maintain insurance policies to cover any liabilities and indemnities that you may incur in connection to the services you provide.

- ☐ Insurance to cover losses in the event of Default on settlement commitments by the depository or a participant (please answer 91a)
- ☐ Insurance for Operational Errors and Error & Omissions (please answer 91c)
- ☐ Insurance for the Premises
- ☐ No insurance
- ☐ 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) (please answer 91b)
- ☐ OTHER:

AGC: 91a
For insurance of default on settlement, what is the amount of the coverage and the amount of deductable? Please also indicate the currency.

N/A

AGC: 91b
For Fidelity insurance, what is the amount of the coverage and the amount of deductible? Please also indicate the currency.

Direct Financial Loss and Professional Indemnity. Total indemnity coverage €35 million, deductible €200,000 per case.

AGC: 91c
For Insurance for Operational Errors and Error & Omissions, what is the amount of the coverage and the amount of deductable? Please also indicate the currency.

Direct Financial Loss and Professional Indemnity. Total indemnity coverage €35 million, deductible €200,000 per case.

AGC: 91d
For Insurance for the Premises, what is the amount of the coverage and the amount of deductable? Please also indicate the currency.

Property insurance. Total amount insured for both ATHEX and CSD €23.2 million, deductible:

Earthquake: 2% of insured amount per location per claim

Landslide/Subsidence: 2% of insured amount per location per claim

Natural disaster: 10% of claim (min. 750€ per case)

Theft 10% of claim (min. 750€)

Short Circuit: 500€ per claim

Glass Breakage: 200€ per claim

Terrorism: 5% of claim (min. 3,000€ per case)

AGC: 97
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.

Depending on the insurance: - AIG - ETHNIKI Hellenic General Insurance Company S.A, - Europe Insurance Co

AGC: 97a.
Who is the insurance carrier's parent company, if applicable? (If inapplicable, simply type n/a.)

Directors and Officers liability: 1) AIG: 100% (1st contract: amount of coverage €10 million), 2) Ethniki: 100% (2nd contract: amount of coverage €40 million in excess of €10 million). - Direct Financial Loss and Professional Indemnity: Ethniki: 100% - Premises Insurance: Europe 70%, Ethniki 30% - General Public & Employers Liability: AIG 100%, - Financial Losses (two contracts Theft and Cash in Transit): Interamerican 100%, - Electronic equipment coverage: Ethniki: 60%, Europe 40% - Cyber Risk insurance: AIG: 100%

AGC: 97b.
What is the term of the policy?

- Directors and Officers responsibility: 26/6/2025 – 25/6/2026 - Direct Financial Loss and Professional Indemnity: 26/6/2025 – 25/6/2026 - Premises Insurance: 28/2/2025 – 28/2/2026 - General Public & Employers: 10/3/2025-10/3/2026, - Financial Losses: 28/02/2025-28/02/2026, o Theft o Cash in Transit - Electronic equipment coverage: 1/3/2025-28/02/2026 - Cyber Risk insurance: 31/07/2025 – 31/07/2026

AGC: 97c, 97d
Who does the insurance cover?

- [ ] Not applicable
- [ ] Final investors
- [ ] Direct CSD participants
- [ ] CSD
- [x] 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: ATHEX Group

AGC: 98
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:

AGC: 98a.
filecount - Upload document here:

AGC: 99
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?

- (●) 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.

AGC: 99a
How will you be making your answers publicly available?

- [x] Upon request
- [x] Website
- [ ] OTHER:

AGC: 99b
This disclosure can also be found at the following web address(es):

https://www.athexgroup.gr/en/post-trade/csd/due-diligence-information

AGC: 99c
First and Last Name of the contact person:

Bitsika Marina, Asset Services Department

AGC: 99d
How do you prefer to be contacted?

- [ ] Fax
- [ ] Telephone
- [ ] mail/air courier
- [x] e-mail

AGC: 99e
Telephone number (please include the international country code):

30 210 3366530

AGC: 99f
Fax number

AGC: 99g
What is the preferred street address for mailing requests?

110 Athinon Avenue, 10442 Athens

AGC: 99h
Email address of the contact person:

questionnaires@athexgroup.gr

AGC: 100
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?

- ○ Yes
- ● No

AGC: 101
Does your organization have a documented cyber security policy in place?

- ● Yes
- ○ No

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

AGC: 102
Please confirm that your staff receive relevant training about this policy.

- ● Yes
- ○ No

AGC: 103
Please confirm what topics are covered by your policy for continuity of business in the event of a large data breach or cyber attack against your organization.

- [x] IT Asset & Inventory Management
- [x] Logging, Monitoring, and Alerting
- [x] Architecture Management
- [x] Cyber Event Detection
- [x] Incident Response and Recovery
- [x] Access Management
- [x] IT Protective Security Technology
- [x] Security Awareness & Training
- [x] Change Management
- [x] OTHER: Physical Security, Cryptography, Network Security, Incident handling, Third Party Risk Management, Compliance for Security, Human Resources Security

AGC: 104
In the last 12 months have there been any changes to the policy?

- (●) Yes
- ( ) No

AGC: 105
Please advise how often you review the policy.

- (●) Annually
- ( ) Semi-annually
- ( ) Other

AGC: 106
filecount - Please provide (as an attachment) a diagram showing where your cyber security function resides and who it reports to.

Org_Chart _ATHEXCSD_EN.pdf (110KB)		

1

AGC: 107
How does your organization identify cyber risks to business functions?

- [x] Risk and Control Assessments
- [x] External Reviews
- [x] Enterprise Risk Management Framework
- [x] OTHER: Commercial Cyber Risk Platforms, Red Teaming, Penetration Tests

AGC: 108
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?

- (●) Yes
- ( ) No

Annual Penetration Test

Quarterly External Vulnerability Scans

Monthly, quarterly and biannual Internal Vulnerability Scans

Biennial Red Teaming Exercises

AGC: 109
What technological controls and protections are in place for your systems and networks?

- [x] Encryption of data at rest
- [x] Encryption of data in transit
- [x] Anti-virus software
- [x] Anti-malware software
- [x] Intrusion detection systems
- [x] Intrusion prevention systems
- [x] Firewalls
- [x] Patch Management
- [x] User Access Controls
- [x] OTHER: DLP, PAM, Network Security Monitoring

AGC: 110
Does your organization use multi-factor authentication

- (●) Yes
- ( ) No

AGC: 111
Where your organization has outsourced activities or functions to a third-party provider, is your cyber risk exposure documented?

- (●) Yes
- ( ) No
- ( ) Not applicable as no outsourcing

AGC: 112
What measures does your organization have to ensure early detection of a cyber attack?

- [x] Incident Response Plan
- [x] Searching for network traffic patterns
- [x] Searching for user login patterns
- [x] Logging of IT systems
- [ ] OTHER:

AGC: 113
What is the agreed resumption time for critical operations following a cyber attack?

- [ ] 8 - 24 hours
- [ ] Longer than 24 hours
- [ ] 4 - 8 hours
- [x] 1 - 4 hours
- [ ] OTHER:

AGC: 114
How would you advise clients of a successful cyber attack against your organization?

- [x] By e-mail
- [ ] By telephone
- [x] Public announcement
- [x] Press release

AGC: 115
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.

- ( ) Yes
- (•) No

AGC: 116a
Are the following elements of your cybersecurity framework tested pre deployment of changes?

- [ ] Testing of incident response process and technical/business/operations (e.g. table-top exercise)
- [x] Scenario based penetration tests
- [x] Vulnerability assessment
- [ ] OTHER:

AGC: 116b
Are the following elements of your cybersecurity framework tested post deployment of changes?

- [x] Vulnerability assessment
- [x] Scenario based penetration tests
- [ ] Testing of incident response process and technical/business/operations (e.g. table-top exercise)
- [ ] OTHER:

AGC: 117
For cloud technology and associated cybersecurity risks, please confirm:
(i) that you have procedures and controls in place to protect our information from mishandling or theft;
(ii) how these procedures and controls tie back to your record retention policy

- ( ) Yes
- ( ) No
- (•) Not applicable as cloud not used

AGC: 118

Does your organisation have a cyber threat inteligence programme to understand and protect against a potential threat actor's motives, targets, and attack behaviors?

- (•) Yes
- ( ) No

AGC: 119
Is your organization aware of SWIFT's Customer Security Program (CSP)?

- [x] Yes
- [ ] No

AGC: 120
Does your organization ensure compliance with SWIFT's CSP controls?

- [x] Yes
- [ ] No