

## DISCLAIMER

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## RESOLUTION No. 24

### "Fee Schedule for ATHEX Markets"

*(Codified into a single text to include the decisions dated 23.04.2015, 8.07.2015, 7.12.2015, 14.04.2016, 28.04.2016, 26.05.2016, 15.09.2016, 30.9.2016, 31.10.2016, 25.11.2016, 19.01.2017, 09.05.2017, 06.12.2017, 05.10.2018, 06.03.2020, 28.01.2021, 01.04.2021, 29.04.2021, 15.06.2021, 05.07.2022, 22.12.2022, 31.1.2023, 11.04.2023, 31.05.2023, 19.07.2023, 21.12.2023, 22.02.2024, 15.04.2024, 26.09.2024, 29.11.2024, 23.12.2024, 19.05.2025, 24.07.2025, 22.09.2025, 31.03.2026 and 25.05.2026 of the Stock Markets Steering Committee of ATHEX).*

### THE STOCK MARKETS STEERING COMMITTEE OF EURONEXT ATHENS

(Meeting of 17.7.2008)

Having regard to the provisions of §§ 1.2.8, 1.5.2, 3.1.8 and 6.3.1 of the ATHEX Rulebook and the need to specify the registration and subscription fees as well as any other charge payable by: a) Members, b) Issuers and c) any other interested party, for the provision of data from the System

### HEREBY RESOLVES AS FOLLOWS

#### PART 1. ATHEX SECURITIES MARKET CHARGES

#### Article 1. Charges payable by ATHEX Members for Trading on the Securities Market

##### 1.1 Member Subscriptions

1. Each Member pays to ATHEX, as a subscription for trading and conducting transactions in general on the Securities Market, the following amounts that vary depending on:

- a) the value of the Member's daily transactions,
- b) the number of orders entered in the Automated Integrated Trading System (OASIS),

c) use of the ATHEX<sup>1</sup> FIX Trading service and<sup>2</sup>

d) the annual volume of trading.

### 1.1.1 Subscription relating to the value of the Member's daily transactions

1. Each Member pays daily to ATHEX, as a subscription, a percentage of the value of its daily transactions, depending on the type of Transferable Security as follows:

a) In case of transactions in shares, pre-emptive rights, and depositary receipts, carried out on the basis of the Methods defined in a relevant Decision of ATHEX other than Method 6, the percentage corresponding to the level chosen by the Member in each trading phase, in accordance with the table below:

| Binding levels        | Transaction Fee |                                 |                           | Minimum Monthly Fee in Euros |
|-----------------------|-----------------|---------------------------------|---------------------------|------------------------------|
|                       | Call Auction    | Automatic & continuous matching | Continuous at Close (ATC) |                              |
| Basic Fee             | 0.0140%         | 0.0122%                         | 0.0125%                   | Without Commitment           |
| 1 <sup>st</sup> level | 0.0135%         | 0.0120%                         | 0.0125%                   | €600                         |
| 2 <sup>nd</sup> level | 0.0130%         | 0.0115%                         | 0.0125%                   | €1,600                       |
| 3 <sup>rd</sup> level | 0.0125%         | 0.0110%                         | 0.0125%                   | €10,000                      |
| 4 <sup>th</sup> level | 0.0120%         | 0.0105%                         | 0.0125%                   | €20,000                      |
| 5 <sup>th</sup> level | 0.0115%         | 0.0100%                         | 0.0125%                   | €30,000                      |
| 6 <sup>th</sup> level | 0.0110%         | 0.0095%                         | 0.0125%                   | €40,000                      |
| 7 <sup>th</sup> level | 0.0108%         | 0.0091%                         | 0.0125%                   | €60,000                      |
| 8 <sup>th</sup> level | 0.0106%         | 0.0088%                         | 0.0125%                   | €80,000                      |
| 9 <sup>th</sup> level | 0.0104%         | 0.0085%                         | 0.0125%                   | €120,000                     |

Each month the Members shall submit a selection statement of any binding level which will be applied to the transaction fees of the following billing month, to ATHEX in advance, no later than three (3) business days before the beginning of that month. The selected binding level shall remain in effect until the Member

<sup>1</sup> Item c) of paragraph 1, article 1.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>2</sup> Item c) of paragraph 1, article 1.1 was deleted and items d) and e) were redesignated as items c) and d) respectively, as above, by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020 and subsequently replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the activation of the ATHEX FIX Trading service in the production Trading System.

sends a new declaration in accordance with the above-mentioned procedure. New Members can submit their first level declaration at any time after their activation.<sup>3</sup>

If a Member fails to make a selection statement of a binding level, then the Base Fee as set out above shall apply to that Member.

Each Member will be charged the Minimum Monthly Fee corresponding to the binding level selected in accordance with the above, even if the fee resulting from the relevant percentage of that level on the value of daily transactions is lower than the Minimum Monthly Fee.

b) **0.0125%** in euro or other currency for transactions in:

- i. stocks,
- ii. pre-emptive rights
- iii. depositary receipts,
- iv. ETF units and
- v. warrants

which are carried out on the basis of the Methods, other than Method 6, stipulated by relevant decision of ATHEX.

c) **0.0125%** in euro or other currency in the case of Method 6 pre-agreed trades in the aforesaid Transferable Securities.<sup>4</sup>

d) **0.01%** in the case of fixed-income securities denominated in euro or other currency.<sup>5</sup>

2. In the event of the transfer of shares with total value in excess of €150,000,000 of corporations whose majority shareholder is the Greek State or whose total assets exceed €150,000,000, from the shareholders to the underwriters, among the underwriters, and from or through the underwriters to final investors, the ATHEX Member that executes the transaction on behalf of both the buyer and the seller will make a single payment to ATHEX amounting to 0.01% of the daily value of the above transactions.

3. The value of a Member's daily transactions, as per paragraph 1 above, does not include the restitution block trades carried out in accordance with Method 6-3 as provided in the ATHEX Rulebook, for which the fees paid to ATHEX are set at the amount of €20 per restitution block trade.

4. The subscription is cleared through ATHEXClear on behalf of ATHEX on the day after the settlement date (SD+1<sup>6</sup>).

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<sup>3</sup> Item a of par.1 of article 1.1.1 was replaced as above by virtue of decision 199/21.12.2023 of the Stock Markets Steering Committee and was later amended by by virtue of decision 200/22.02.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.03.2024.

<sup>4</sup> Item b) of paragraph 1, article 1.1 was replaced as above by virtue of decision 178/28.01.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 06.04.2021.

<sup>5</sup> Item d) of paragraph 1, article 1.1.1 was replaced as above by virtue of decision 120/31.10.2016 of the Stock Markets Steering Committee of ATHEX with effect as of 7/11/2016 and was later amended by virtue of decision 200/22.02.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.03.2024.

<sup>6</sup> Subparagraph 4 of article 1.1.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 03.02.2025.

5. An ATHEX Member that is an ATHEXClear Clearing Member shall pay its subscriptions through the Cash Settlement Accounts it keeps at cash settlement Agencies as specified by Hellenic Exchanges S.A. and in accordance with its procedures. If the ATHEX Member is not a Clearing Member, its subscriptions must be paid by the ATHEXClear General Clearing Member with which it collaborates, which must make a corresponding credit for the subscription amounts through its own Cash Settlement Accounts that it keeps at the respective cash settlement Agencies. In every case, the ATHEX Member must ensure the payment of its subscriptions in accordance with the prerequisites and procedures laid down by ATHEX and ATHEXClear.<sup>7</sup>

### 1.1.2 Subscription relating to the Member's orders in the System

1. In the case of orders relating to:

- a) stocks,
- b) pre-emptive rights,
- c) depositary receipts,
- d) ETF units,
- e) warrants and
- f) fixed-income securities<sup>8</sup>

the Member is obliged to pay to ATHEX the amount of **€0.06** per order. Orders that are entered and remain in the order book for more than 15 seconds, without being executed, are exempt from this fee.

2. The obligation to pay to ATHEX the amount of **€0.06** does not apply to a Member having the capacity of Market Maker in a Transferable Security, with respect to orders entered in OASIS in fulfillment of its market-making obligations (buy and sell quotes as well as Market Maker Single Orders<sup>9</sup>).<sup>10</sup>

3. The subscription is cleared through ATHEXClear on behalf of ATHEX on the day after the settlement date (SD+1<sup>11</sup>).

4. An ATHEX Member that is an ATHEXClear Clearing Member shall pay its subscriptions through the Cash Settlement Accounts it keeps at cash settlement Agencies as specified by ATHEXCSD<sup>12</sup> in accordance with its procedures. If the ATHEX Member is not a Clearing Member, its subscriptions must be paid by the

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<sup>7</sup> Paragraph 5 of article 1.1.1 was replaced as above by virtue of decision 178/28.01.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 06.04.2021.

<sup>8</sup> Item f) of paragraph 1, article 1.1.2 was added by virtue of decision 115/15.9.2016 of the Stock Markets Steering Committee of ATHEX with effect as of that date.

<sup>9</sup> Paragraph 2 of article 1.1.2 was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 30.03.2020.

<sup>10</sup> Paragraph 2 of article 1.1.2 was deleted and the subsequent paragraphs 3, 4 and 5 were renumbered 2, 3 and 4 respectively by virtue of decision 115/15.9.2016 of the Stock Markets Steering Committee of ATHEX with effect as of that date.

<sup>11</sup> Paragraph 3 of article 1.1.2 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 03.02.2025.

<sup>12</sup> Paragraph 4 of article 1.1.2 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

ATHEXClear General Clearing Member with which it collaborates, which must make a corresponding credit for the subscription amounts through its own Cash Settlement Accounts that it keeps at the respective cash settlement Agencies. In every case, the ATHEX Member must ensure the payment of its subscriptions in accordance with the prerequisites and procedures laid down by ATHEX and ATHEXClear.<sup>13</sup>

### 1.1.3 Subscription relating to the value of transactions concluded annually<sup>14</sup>

Each Member pays to ATHEX a fixed annual fee that is calculated on the basis of the value of the transactions it concludes annually, in accordance with the Table below.<sup>15</sup> For the purpose of calculating the value of transactions concluded annually, the transactions of a Member as Market Maker are not taken into account.<sup>16</sup>

| Value of Member's transactions concluded annually (in €) |                   | Fee (€) |
|--|-------------------|---------|
| From   | To                |         |
| 0.01   | 150,000,000.00    | 0       |
| 150,000,000.01   | 500,000,000.00    | 2,000   |
| 500,000,000.01   | 1,000,000,000.00  | 18,000  |
| 1,000,000,000.01   | 2,500,000,000.00  | 25,000  |
| 2,500,000,000.01   | 5,000,000,000.00  | 60,000  |
| 5,000,000,000.01   | 10,000,000,000.00 | 70,000  |
| 10,000,000,000.01  | 15,000,000,000.00 | 180,000 |
| 15,000,000,000.00  | 20,000,000,000.00 | 200,000 |
| 20,000,000,000.01  |                   | 300,000 |

This fee is calculated for ATHEX Members per calendar quarter on the basis of the turnover of transactions for that quarter. More specifically, after the last day of the calendar quarter, the ATHEX Member's turnover of transactions is calculated for that quarter. For the purpose of calculating the fee, the value of transactions is annualized (the quarterly value of transactions is multiplied by four). The fee for the

<sup>13</sup> Paragraph 4 of article 1.1.2 was replaced as above by virtue of decision 178/28.01.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 06.04.2021.

<sup>14</sup> At meeting 84/7.12.2015 of the Stock Markets Steering Committee of ATHEX it was decided to grant a discount of €2,000 on a Member's fixed yearly fee as calculated in accordance with the table of paragraph 1.1.3 on the basis of the value of transactions concluded annually. This discount applies to the fixed yearly fee calculated for the year 2015.

<sup>15</sup> The first sentence of the first paragraph of article 1.1.3 was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>16</sup> The second sentence of the first paragraph of article 1.1.3 was added as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

respective segment, as per the above Table, is applied to the result and the fee is computed on a quarterly basis by reversing the previous calculation.

#### 1.1.4 Discounts for Market Makers<sup>17</sup>

1. Market Makers are entitled to discounts per security (ISIN) on trading fees for transactions in all stocks on the Main Market, fixed-income securities, exchange-traded funds and warrants, following their final evaluation by means of the procedure set out in Resolution 2 of ATHEX, as in force, and in accordance with the following table:

| Securities Market | Criterion  | Evaluation Result | Rebate   |
|-------------------|--|-------------------|--|
| Main Market       | Rating of Middle Trading Activity or Low Trading Activity stocks and Criterion of monthly alarms   | Yes               | 50% of transaction fees received during the preceding quarter for the transferable security in question  |
| Main Market       | Rating of High Trading Activity stocks and Criterion of monthly alarms and Criterion of ratio of value of (passive) orders to total value  | Yes               | 20% of transaction fees received during the preceding quarter for the transferable security in question  |
| Main Market       | Rating of Middle Trading Activity or Low Trading Activity stocks and Criterion of monthly alarms and Criterion of ratio of value of (passive) orders to total value                              | Yes               | 100% of transaction fees received during the preceding quarter for the transferable security in question |
| Main Market       | Rating of Middle Trading Activity or Low Trading Activity stocks and Criterion of ratio of value of (passive) orders to total value and Criterion of Transfer to a higher stock liquidity Rating | Yes               | 0.01% of the value of transactions in the transferable security without block trades                     |
| Main Market       | Rating of Middle Trading Activity stocks and Criterion of monthly alarms and Criterion of ratio of value of (passive)  | Yes               | 10% of transaction fees received during the preceding quarter per transferable security in               |

<sup>17</sup> Article 1.1.4 was replaced as above by virtue of decision 132/19.1.2017 of the Stock Markets Steering Committee of ATHEX with effect as of 30/1/2017.

|   |   |     |  |
|---|---|-----|--|
|   | <b>orders to total value and Criterion of Turnover Velocity Improvement</b>                           |     | the High Trading Activity segment with maximum rebate the following amounts per number of transferable securities traded by Market Makers in the Middle Trading Activity segment:<br><br>€1,000 for 1 share<br>€1,500 for 2 shares<br>€2,000 for 4 shares<br>€2,500 for 5 shares and above |
| <b>Fixed-Income Securities, Exchange-Traded Funds, Warrants</b> | <b>Criterion of monthly alarms</b>  | Yes | 50% of transaction fees received during the preceding quarter for the transferable security in question  |
| <b>Fixed-Income Securities, Exchange-Traded Funds, Warrants</b> | <b>Criterion of monthly alarms and Criterion of ratio of value of (passive) orders to total value</b> | Yes | 100% of transaction fees received during the preceding quarter for the transferable security in question   |

2. The Market Maker will receive 100% of the fees for those transactions it has carried out on the basis of significant short-term changes in price and volume, as these are specified in article 5 (10) of Resolution no. 22 of ATHEX for the respective Financial Instrument.<sup>18</sup>

## 1.2 ATHEX fees for use of the ORAMA application, ATHEX TRADER application and ATHEX FIX Trading service<sup>19, 20</sup>

1. The use of the ORAMA application in the production environment for the Members is provided free of charge.

<sup>18</sup> Paragraph 2 of Article 1.1.4, Part 1 was added as above by virtue of decision 161/06.12.2017 of the Stock Markets Steering Committee of ATHEX with effect as of 3.1.2018.

<sup>19</sup> Article 1.2 of Part 1 was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020 and subsequently replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the calendar month following the calendar month of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>20</sup> The title of article 1.1.2 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

### 1.2.1. Fees for the use of the ATHEX TRADER order entry application<sup>21</sup>

1. The use of the ATEX Trader order entry application is provided to the Members in the OASIS Production system. Each Member may use up to four (4) ATHEX Trader application users free of charge. The use of additional application users is subject to an annual fee of €1,200 per application user, which also includes full market depth for securities and derivatives. Billing is done on a quarterly basis. In case of activation or deactivation of an application user, the charge will be applied pro rata from or until the date of activation or deactivation respectively.
2. The opportunity to use the ATHEX Trader application for the Members of ATHEX in the OASIS testing environment (UAT) is given, free of charge, regardless of the number of users.

### 1.2.2. Fees for the ATHEX FIX TRADING service

1. The ATHEX FIX Trading service is charged as follows:

- For each Drop Copy Session (DC), an annual charge of €1,200.
- For each Trading Session (TC), an annual charge of €2,400.

At the same time:

- a) All ATHEX Securities Market Members having also membership of the ATHEX Derivatives Market are entitled to one (1) Trading Session free of charge.
- b) Any Members engaged in Market Making in either the Securities Market or the Derivatives Market are entitled to one (1) Trading Session free of charge.

In view of the above, Members who are at the same time Members of the Derivatives Market and Market Makers in either Securities or Derivatives, or both, are entitled to a maximum of (2) Trading Sessions free of charge.

For the calendar year 2023, ATHEX provides one (1) Trading Session free of charge and one (1) Drop Copy Session free of charge to all Trading Members of ATHEX, in addition to the aforementioned.

As for the member's connection selection method via the Internet, the implementation of each IPSec VPN tunnel for both the test environment (UAT) and the production environment will have a fixed monthly connection fee of €275 and a one-off fee as set out in the Annex of this Resolution.

The ATHEX FIX Trading service is billed on a quarterly basis.<sup>22</sup>

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<sup>21</sup> Paragraph 1 of Article 1.2.1. of Part A was amended as above by virtue of Resolution No. 219/25.05.2026 of the ATHEX Stock Markets Steering Committee and shall apply as of 29.05.2026.

<sup>22</sup> A new paragraph 3 was added to article 1.2 of Part 1 and the subsequent paragraphs were renumbered as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the calendar month following the calendar month of activation of the ATHEX FIX Trading service in the production Trading System.

2. <sup>23</sup>ATHEX members that provide the “Direct Market Access” (DMA) service to their clients shall pay, as applicable, the following amounts:

a) for use of the DMA service, €600 per year.

b) for the DMA service made available through other Providers, they will pay an amount that is determined by taking into consideration the charges imposed by providers, infrastructure and telecommunication costs and the client's special requirements with regard to interconnection and controls, which (amount) will be agreed in consultation with the Member.

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3. For the “Direct Market Access” (DMA) service and “Sponsored Access” (SA) service in the Test environment, the charge specified in Part 5, article 5, paragraph 5.1.6 hereof shall be payable.

<sup>25, 26</sup>,

## Article 2. Fees for Listed Companies

### 2.1 One-time fees for the admission and registration of transferable securities on the ATHEX securities market

#### 2.1.1 SHARES

##### 2.1.1.1 First-time admission

1. Upon submission of a company's application for the admission of its shares to trading on ATHEX, the lump-sum amount of €10,000<sup>27</sup> is paid to cover the cost of processing the application. This lump-sum amount is payable irrespective of whether the company's shares are subsequently admitted to trading on ATHEX.

2. The above lump-sum amount shall be paid again in case of submission of an updated application after the expiry of six (6) months from the initial submission.<sup>28</sup>

3. Companies whose shares are admitted to trading on ATHEX for the first time must pay a one-time **registration fee**, the amount of which is calculated according to the following scale:

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<sup>23</sup> The last field of paragraph 1 of article 1.2.1 was removed as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 24.12.2024.

<sup>24</sup> Previous paragraphs 6,7,8 of article 1.2.1 were removed as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>25</sup> Article 1.3 was removed as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>26</sup> Article 1.4 of Part 1 was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 30.03.2020 and was later removed by virtue of decision 194/19.07.2023 of the Stock Markets Steering Committee of ATHEX with effect as of 24.07.2023.

<sup>27</sup> Paragraph 1 of article 2.1.1.1 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>28</sup> A new paragraph was added to article 2.1.1.1 and the other paragraphs were renumbered as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

| VALUE OF SHARES ADMITTED        | Percentage of value |
|---------------------------------|---------------------|
| Up to €1,000,000,000            | 0.04%               |
| €1,000,000,001 - €3,000,000,000 | 0.02%               |
| Over €3,000,000,000             | 0.00%               |

3. The value of shares to be admitted is derived as the product of the number of securities admitted and the admission price. In the case of § 3.1.15.6 of the Rulebook, for the calculation of this charge, the value of the shares will be the product of the number of securities multiplied by the listing price on the date of commencement of trading.<sup>29</sup>

#### **<sup>30</sup>2.1.1.2 Admission to trading of new shares following a share capital increase in cash**

Listed companies that perform a share capital increase through cash contributions are obliged to pay a registration fee for the admission to trading of the new shares according to the following scale:

| VALUE OF NEW SHARES | Percentage of value |
|---------------------|---------------------|
| Up to €50,000,000   | 0.050%              |
| Over €50,000,000    | 0.025%              |

#### **2.1.1.3 Admission to trading of shares following merger – absorption – asset contribution**

1. The provisions of par. 2.1.1.1 above apply also to the admission to trading of shares in any segment of the Securities Market, which originate from merger through absorption of a company not listed on ATHEX by a company whose shares are traded, as well as in the case of a share capital increase through asset contribution. In such a case, the value of admitted securities is calculated by multiplying the number of shares to be listed which are allocated to shareholders of the absorbed company by the market price of the share.

2. If, in order to achieve a sufficient free float, securities resulting from the merger are sold by public offering, the value of the securities to be listed is calculated on the basis of the public offering price.

#### **2.1.1.4 Admission to trading of shares from conversion of bonds – convertible bond loan – stock option – dividend reinvestment**

Listed companies that have their shares admitted to trading in any segment of the Securities Market, which (shares) result from:

<sup>29</sup> Paragraph 4 of article 2.1.1.1. was amended as above by virtue of decision 212/19.05.2025 of the Stock Markets Steering Committee of ATHEX with effect as of 05.06.2025.

<sup>30</sup> Paragraphs 4 and 5 were removed as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

1. Conversion of bonds into shares of a listed or unlisted convertible bond loan, or a share capital increase through dividend reinvestment, shall pay registration fees for the value of the new shares in the amount stipulated in par. 2.1.1.2, section 2.1 (*Admission to trading of new shares following a share capital increase in cash*) with the minimum registration fee set at €2.000<sup>31</sup>.

2. While in the case of a share capital increase based on the exercise of a stock option, they shall pay the amount of €2.000<sup>32</sup>.

#### **2.1.1.5 Processing of applications for the re-admission to trading of shares<sup>33</sup>**

1. For applications submitted for the re-admission to trading of a company's shares, trading in which has been suspended for a period of more than six months, the amount of €15.000 is payable upon submission of the application to cover its processing costs<sup>34</sup>.

2. For the listing of additional series of shares that were issued during the suspension period, the percentages stipulated for the corresponding corporate actions shall be applied<sup>35</sup>.

The total amount resulting from the above cannot be less than €15,000.

#### **2.1.1.6 Processing of applications for transfer of shares from the "Under Surveillance" segment**

For applications submitted by a listed company for the transfer of its shares from the "Under Surveillance" segment, the amount of €3,000 is payable upon submission of the application to cover its processing costs.

#### **2.1.1.7 Indirect Admission to Trading**

1. In the case of a share capital increase of a listed company due to merger through absorption, takeover of a division or contribution of assets of an unlisted company:

a) a lump-sum amount of €20,000<sup>36</sup> is payable upon submission of the Information Document,

b) at the time of admission to trading of shares, the charge of par. 2.1.1.1 (*First-time admission*) of this article shall be applied. The value of admitted securities is calculated by multiplying the number of shares to be admitted which are allocated to shareholders of the absorbed unlisted company, the division taken over or

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<sup>31</sup> Paragraph 1 of article 2.1.1.4 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>32</sup> Paragraph 2 of article 2.1.1.4 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>33</sup> The title of article 2.1.1.5 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>34</sup> Paragraph 1 of article 2.1.1.5 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>35</sup> Paragraph 2 of article 2.1.1.5 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>36</sup> Field of subparagraph 1 of article 2.1.1.7 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

the assets contributed of the unlisted company, by the market price of the share, with the minimum amount set at €15,000.<sup>37</sup>

2. In the case of acquisition of an unlisted company without admission to trading of shares:

a) a lump-sum amount of €15,000 is payable upon submission of the Information Document,

b) the amount of the first annual subscription after completion of the corporate transformation is increased by 50%.

#### **2.1.1.8 Examination of Information Document**

For the approval by ATHEX of the content of an Information Document for the public offering of transferable securities on the Securities Market of Athens Exchange, the amount of €10,000 is payable. For the examination of the content of an Information Document supplement, the amount of €1,000 is payable.<sup>38, 39</sup>

### **2.1.2 Fixed Income Securities**

#### **2.1.2.1 Corporate Bonds – Bank Bonds – Securities issued by the Greek Government and Legal Persons governed by Public Law**

1. In the case of bank bonds and corporate bonds, upon submission of the application by the Issuer for the listing of its bonds on ATHEX, a lump-sum amount of €7,000 for an Issuer already listed on the ATHEX or €10,000 for an Issuer not listed on the ATHEX is paid for the costs of the examination of the application. The above lump-sum amount shall be paid again in case of submission of an updated application after the expiry of six (6) months from the initial submission.<sup>40</sup>

2. For the listing of the first issue and each subsequent issue or renewal, a lump-sum subscription right, the amount of which is set at 0.002% of the total value of the bonds, with a minimum issue threshold of €5,000, is paid to ATHEX. If no provision has been made for the trading of a bond loan on ATHEX, the amount of €5,000 is payable for the admission to trading of the pre-emptive rights. If the bond loan is admitted to trading on ATHEX, this amount will be offset against the above-mentioned lump-sum amount for listing.<sup>41</sup>

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<sup>37</sup> Instance b of subparagraph 1, paragraph 2.1.1.7, Part 1 was added as above by virtue of decision 161/06.12.2017 of the Stock Markets Steering Committee of ATHEX with effect as of 11.12.2017.

<sup>38</sup> Subparagraph 2.1.1.8 of paragraph 2.1, article 2 of Part 1 was added by virtue of decision 104/26.5.2016 of the Stock Markets Steering Committee of ATHEX with effect as of that date.

<sup>39</sup> Article 2.1.1.8 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>40</sup> Paragraph 1 of article 2.1.2.1 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>41</sup> Paragraph 2 of article 2.1.2.1 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

2. In the case of securities issued by the Greek government and legal persons governed by public law, the lump-sum amount of **€1,500** is payable to ATHEX for the listing of the first issue and each subsequent issue or renewal.

### 2.1.3 Depositary Receipts / Warrants

#### 2.1.3.1 Listing of Depositary Receipts / Warrants

1. The lump-sum amount payable by issuers of depositary receipts as a registration fee at the time of securities listing is determined as follows:

a) Lump-sum registration fee at the time of securities listing, the amount of which is calculated according to the following scale:

| VALUE OF LISTED SHARES          | Percentage of value |
|---------------------------------|---------------------|
| Up to € 30,000,000              | 0.02%               |
| € 30,000,001 to € 60,000,000    | 0.01%               |
| € 60,000,001 to € 3,000,000,000 | 0.005%              |
| €3,000,000,001 and above        | 0.00%               |

b) Lump-sum registration fee at the time of listing of new securities (supplementary series) resulting from cash payment, the amount of which is set at 0.025% of the issue value with a maximum issue value limit of €2,000,000,000, above which no charge is payable.

c) The minimum lump-sum registration fee is set at €1,000.

d) The value of securities to be listed is calculated by multiplying the number of securities by the admission price.

2. The lump-sum amount, which is paid by the issuer of warrants as defined specifically for the purposes of the ATHEX Rulebook, as a registration fee at the time of their listing, is calculated by applying the charge of par. 2.1.1.2 of this article (*Admission to trading of new shares following a share capital increase in cash*) to the value of the underlying shares. And more specifically:

a) The value of the underlying shares is calculated by multiplying the issue price of the underlying share at the time of its issue by the shares corresponding to each warrant.

b) The above-mentioned issuer shall not be obliged to pay the aforesaid lump-sum registration fee in cases where a registration fee has been paid for the underlying shares of the warrants.

#### 2.1.4 ETF Units

### 2.1.4.1 First admission to trading

In respect of ETF Units admitted to trading on ATHEX for the first time, issuers shall make a lump-sum payment to cover the cost of processing the relevant application and as a registration fee, the amount of which is set at €3,000. This lump-sum amount is payable upon submission of the application for admission to trading and irrespective of whether or not the ETF Units are subsequently admitted to ATHEX.

### 2.1.4.2 Admission of new units due to corporate events

No admission fees are payable for new Units admitted to ATHEX due to the creation process.

## 2.2 Quarterly subscriptions

### 2.2.1 Shares

1. Companies whose shares are classified in the "**Main Market**" and "**Under Surveillance**" segments are obliged to pay ATHEX quarterly subscriptions in advance.<sup>42</sup>
2. The quarterly subscriptions are calculated on the basis of the segment in which the listed company's shares were trading prior to the end of the quarter.
3. The subscription amount is calculated according to the following scale:

| Capitalization (in €)     | Percentage of value    |
|---------------------------|------------------------|
| Up to 100,000,000         | 0.0030%                |
| 100,000,001 - 250,000,000 | 0.0025 <sup>43</sup> % |
| 250,000,001 and above     | 0.0005%                |

4. The minimum amount of subscriptions cannot be less than €1,000 annually.
5. For companies whose transferable securities are traded in the "Under Surveillance" segment, the minimum amount of subscriptions cannot be less than € 6.000 per year<sup>44, 45</sup>. The aforesaid quarterly

<sup>42</sup> Subparagraph 1 of Article 2.2.1, Part 1 was replaced as above by virtue of decision 161/06.12.2017 of the Stock Markets Steering Committee of ATHEX with effect as of 11.12.2017.

<sup>43</sup> The fields of the table of paragraph 3 of article 2.2.1 were amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>44</sup> The first sentence of subparagraph 5, Article 2.2.1, Part 1 was replaced as above by virtue of decision 161/06.12.2017 of the Stock Markets Steering Committee of ATHEX with effect as of 11.12.2017.

<sup>45</sup> Paragraph 5 of article 2.2.1 was amended as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

subscriptions are fully paid in advance at the beginning of each calendar quarter, irrespective of the number of days on which the company's securities are traded in the quarter.

6. The value of the company's listed securities is calculated using the formula:

$$\text{VALUE} = \text{NUMBER OF LISTED SHARES} \times \text{AVERAGE SHARE PRICE}$$

(in the last month of the previous reference quarter)

By way of exception, and only in respect of the company's first quarterly subscription, the average share price is considered to be the admission price.

7. <sup>46</sup>The above shall also apply in cases where new unlisted or listed shares result from the conversion of bonds to shares, provided the conversion does not affect the price of the shares.

8. In cases of detachment of rights when the new shares have not been listed on ATHEX until the last month of the previous quarter, for the purpose of calculating the value of the listed securities, the average price and the number of listed shares in the month prior to detachment of the right shall be taken into account. For the purpose of calculating the quarterly subscriptions, the average price of securities shall be the price computed by ATHEX on the basis of the daily closing prices of each security. The closing price shall be the price at which the last trade was made, irrespective of the date of the session during which the transaction was carried out. In the event there is no "last trade" price, the "last ask" price shall be used. If there is no "last ask" price, the "last bid" price shall be used.

9. In cases where companies increase their share capital either by distributing bonus shares (stock split) or payment in cash, the following apply:

a) If there has been a detachment of rights at any time prior to or during the month on the basis of which the average price of shares would have been calculated as normal (e.g. from 1/10 to 31/12/1999 for the billing of the first quarter of 2000) and the new shares have already been admitted to trading, then the procedure set out in the above paragraphs is followed as normal.

b) If, however, the new shares have not yet been admitted to trading, (i.e. during the month used as the basis for calculating the subscription) then the quarterly subscription of the company in question shall be calculated on the basis of the average price and number of its listed shares in the month preceding the detachment date.

In cases where the share capital increase involves both the distribution of bonus shares and the payment of cash, and only the shares of the first category have already been admitted to trading, the procedure of the immediately preceding paragraph will be followed without taking into account the admission of the bonus shares. The same also applies in the reverse instance, i.e. in the case where the listing of shares against cash payment takes place first.

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<sup>46</sup> Paragraph 7 of article 2.2.1 was removed and the other paragraphs were renumbered as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

### 2.2.2. Fixed Income Securities<sup>47</sup>

1. The Issuers, for each bond issue they admit to trading on ATHEX, pay a quarterly subscription fee of €500 each.
2. This quarterly subscription fee shall be paid in full at the beginning of each calendar quarter regardless of the trading days of the corporate bonds during the quarter.

### 2.2.3 Depositary Receipts / Warrants

1. Issuers are obliged to pay quarterly subscriptions, which are determined as follows:
  - a) 0.002% for a value of less than €600,000.
  - b) 0.001% for a value between €600,001 and €250,000,000.
  - c) 0.0005% for a value of more than €250,000,001.
2. The minimum amount of the quarterly subscription is set at €100.
3. The value of listed transferable securities, on the basis of which the above amounts are calculated, is derived as the product of the number of listed shares and the average price of the last month of the previous calendar quarter. In cases of detachment of rights when the new securities have not been listed on ATHEX until the last month of the previous quarter, for the purpose of calculating the value of the listed securities, the average price and the number of listed shares in the month prior to the detachment date shall be taken into account.
4. Specifically in the case of warrants, for which a registration fee has been paid for the underlying shares, no quarterly subscriptions are payable to ATHEX.

### 2.2.4 ETF Units

1. In the case of ETF Units admitted to trading on ATHEX, issuers shall pay a quarterly subscription of **€300** per ETF.
2. The aforesaid quarterly subscription is fully paid in advance at the beginning of each calendar quarter, irrespective of the number of days on which the Units of each ETF are traded in that quarter.

<sup>48</sup>

## 2.3 SURCHARGES

In the event of non-fulfillment or improper fulfillment of the obligations emanating from sections 3, 4 and 5 of the ATHEX Rulebook, the company's next quarterly subscription may be increased as follows:

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<sup>47</sup> A new article 2.2.2 was added and the other articles were renumbered as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>48</sup> Previous article 2.3 was removed and the other articles were renumbered as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

### 2.3.1.1 Issuer Reporting Obligations

1. For breach of regular reporting obligations, a surcharge is imposed as follows:

- a) For failure to file periodic reports pursuant to Law 3556/2007 and the decisions of the Hellenic Capital Market Commission which are issued in implementation thereof, the amount of €1,000-€50,000.
- b) For failure to publish the financial calendar, the amount of €5,000. For failure to update the financial calendar, the amount of €5,000-€50,000.

2. For breach of ad hoc reporting obligations, the surcharge to be imposed will be as follows, depending on the type of information reported:

- a) Omission or delay in reporting on the convening of a General Meeting, €1,000.
- b) Omission or delay in reporting on resolutions adopted by a General Meeting, €1,000.
- c) Omission or delay in reporting on the payment of dividends or interim dividends, €1,000.
- d) Omission or delay in reporting on corporate actions, €1,000-€50,000.
- e) Omission or delay in reporting on privileged information and relevant reports, €5,000-€100,000.
- f) Omission or delay in reporting on a change in the use of funds raised, €5,000-€50,000.
- g) Omission or delay in reporting on ongoing notification requirements pursuant to Law 3556/2007, €1,000-€50,000.
- h) Omission or delay in reporting on the notification of transactions by persons subject to Law 3340/2005, €1,000-€5,000.
- i) Omission or delay in reporting on the acquisition or transfer of own shares, €1,000-€5,000.
- j) Omission or delay in replying to questions submitted by ATHEX, €5,000-€50,000.
- k) Omission or delay in providing information to analysts, €1,000.
- l) Omission or delay in issuing information notes on corporate events, €5,000-€50,000.
- m) Omission or delay in reporting the outcome of any tax audit that may have been carried out on the issuer, €1,000-€50,000.

n) Omission or delay in issuing an announcement on indirect admission to trading, €5,000, and for failure to issue an information note on indirect admission to trading, €15,000.

o) Omission or delay in providing information to bond issuers, €1,000-€5,000.

p) Omission or delay in providing information to ETF issuers, €1,000-€5,000.

q) Omission or delay in providing information to a company Under Surveillance, €1,000-€15,000.

3. If the same breach is repeated more than twice, an additional amount of €5,000-€25,000 will be imposed.

### **2.3.1.2 Corporate actions**

For breaches committed during the implementation of corporate actions, a surcharge is imposed as follows:

a) For late submission of supporting documents, €1,000 for each instance of delay. If the same breach is repeated more than twice, an additional amount of €5,000 will be imposed for each subsequent late submission.

b) For submission of an improper application or provision of incorrect information, €5,000-€100,000. If the same breach is repeated more than twice, an additional amount of €25,000 will be imposed for each subsequent improper submission.

### **2.3.1.3 Other breaches**

1. In the event of failure to implement any provision of the Rulebook, a surcharge of €5,000-€150,000 will be imposed.

2. If more than one breach occurs concurrently, the respective surcharges may be imposed in conjunction.

3. Surcharges are specified for each breach and imposed as a penalty by decision of the Board of Directors of ATHEX.

## **2.4. Voluntary Deletion of a company ATHEX<sup>49</sup>**

1. For the voluntary deletion of the Issuer's securities from ATHEX, the lump-sum amount of € 20.000 is paid.

2. The above fee is not imposed in case the deletion of the Issuer's securities from ATHEX is accompanied by an application for membership in a multilateral trading facility managed by ATHEX.

3. In case the deletion of the Issuer's securities from ATHEX takes place in the context of the re-listing of the same company under another legal entity in parallel with the listing on another regulated market or stock exchange in general, the amount of par. 1 shall be netted against the proceeds of the admission of the new shares to the regulated market of the Stock Exchange.

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<sup>49</sup> A new article 2.4 was added as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

## 2.5. Special request services<sup>50</sup>

For special requests of the Issuer to ATHEX for services that are not described herein, the following charges are paid in a lump-sum:

- a. €90 / man-hour for the employment of an executive (working days, within working hours)
- b. €180 / man-hour for the employment of an executive (outside working days/hours)

## 2.6. Issue of Certificates<sup>51</sup>

For the issuance of certificates to Issuers, upon their request, for any legal use, a fee of €50 per certificate and €150 per certificate if it bears the Hague seal (apostille) is charged.

## Article 3. Fees for the Compulsory Public Auction Service – Forced Sales of par. 3 and 5, article 20, Law 4569/2018 and § 2.3.13.1 of the ATHEX Rulebook.<sup>52</sup>

### 3.1 Fees payable by the Petitioner

1. Upon submission of the application to ATHEX for use of the Compulsory Public Auction Service of par. 3 and 5, article 20, Law 4569/2018, in accordance with the provisions of § 2.3.13.1 of the ATHEX Rulebook and ATHEX Resolution 37, fees for the provision and support of the aforesaid Service by ATHEX are charged to the Petitioner as follows:

- the amount of one hundred (100) euros per auction, when the starting bid price is equal to or less than three thousand (3,000) euros,
- the amount of three hundred and fifty (350) euros per auction, when the starting bid price is higher than three thousand (3,000) euros, and
- the amount of five hundred (500) euros per auction, when the starting bid price is higher than three thousand (3,000) euros.

The starting bid price is defined as the value based on the closing price of the Liquidity Market on the date of the trading session immediately preceding the application.

2. From the above fees, the amount of €50 is refunded to the Member upon the latter's acceptance to carry out the forced sale.

3. If forced sale transactions are conducted, the Petitioner shall pay a fee of 0.35% of the value of the sold Securities to the ATHEX Member appointed to carry out the forced sale.

## PART 2. ATHEX DERIVATIVES MARKET CHARGES

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<sup>50</sup> A new article 2.5 was added as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>51</sup> A new article 2.6 was added as above by virtue of decision 209/23.12.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>52</sup> A new article (3) was added to Part 1 as above by virtue of decision 185/05.07.2022 of the Stock Markets Steering Committee of ATHEX with effect as of 05.09.2022.

## Article 1. Annual subscription fees for Members of the ATHEX Derivatives Market

### 1.1 Annual Subscription<sup>53</sup>

| Capacity     | Annual subscription |
|--------------|---------------------|
| ATHEX Member | €2,000              |

1. The annual subscription is charged quarterly on an ex-post basis.<sup>54</sup>
2. The use of the ORAMA application in the production environment for the Members<sup>55</sup> is provided free of charge.<sup>56</sup>

#### 1.1.1 Fees for the use of the ATHEX TRADER order entry application<sup>57</sup>

1. The use of the ATHEX Trader order entry application is provided to the Members in the OASIS Production system. **Each Member may use up to four (4) ATHEX Trader application users free of charge. The use of additional application users is subject to** an annual fee of €1,200 per application user, which also includes full market depth for securities and derivatives. Billing is done on a quarterly basis. In case of activation or deactivation of an application user, the charge will apply pro rata from or until the date of activation or deactivation respectively.
2. The possibility to use the ATHEX Trader application for the Members of ATHEX in the OASIS testing environment (UAT), free of charge, regardless of the number of users.
3. For a User who has access to both Markets (Securities and Derivatives), the fee referred to in Article 1.2.1 of Part A for the Securities Market applies.

#### 1.1.2 ATHEX FIX Trading Service fees

1. The ATHEX FIX Trading service is charged as follows:
  - \* For each Drop Copy Session (DC), an annual charge of €1,200.
  - \* For each Trading Session (TC), an annual charge of €2,400.

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<sup>53</sup> At meeting 116/30.9.2016 of the Stock Markets Steering Committee of ATHEX it was decided to grant a discount of €1,000 on a Member's annual subscription fee as set in the table of paragraph 1.1 above. This discount applies to the annual subscription for the year 2016.

<sup>54</sup> Paragraph 1 of article 1.1, Part 2 was amended as above by virtue of the decision dated 22/10/2015 of the Stock Markets Steering Committee of ATHEX, with effect as of 1/1/2016.

<sup>55</sup> Paragraph 1 of article 1.1.2 of Part 2 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 04.11.2025.

<sup>56</sup> Paragraph 2 of article 1.1 was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>57</sup> Paragraph 1 of Article 1.1.1 of Part B was amended as above by virtue of Resolution No. 219/25.05.2026 of the ATHEX Stock Markets Steering Committee and shall apply as of 29.05.2026.

At the same time:

- a) All ATHEX Securities Market Members having also membership of the ATHEX Derivatives Market are entitled to one (1) Trading Session free of charge.
- b) Any Members engaged in Market Making in either the Securities Market or the Derivatives Market are entitled to one (1) Trading Session free of charge.

In view of the above, Members who are at the same time Members of the Derivatives Market and Market Makers in either Securities or Derivatives, or both, are entitled to a maximum of (2) Trading Sessions free of charge.

For the calendar year 2023, ATHEX provides one (1) Trading Session free of charge and one (1) Drop Copy Session free of charge to all Trading Members of ATHEX, in addition to the aforementioned.

As for the member's connection selection method via the Internet, the implementation of each IPSec VPN tunnel for both the test environment (UAT) and the production environment will have a fixed monthly connection fee of €275 and a one-off fee as set out in the Annex of this Resolution.

The ATHEX FIX Trading service is billed on a quarterly basis.<sup>58</sup>

2. ATHEX members that provide the "Direct Market Access" (DMA) service to their clients shall pay, as applicable, the following amounts:

- a) for use of the DMA service, €600 per year.
- b) for the DMA service made available through other Providers, they will pay an amount that is determined by taking into consideration the charges imposed by providers, infrastructure and telecommunication costs and the client's special requirements with regard to interconnection and controls, which (amount) will be agreed in consultation with the Member.<sup>59</sup>

## Article 2. <sup>60</sup>DERIVATIVES MARKET COMMISSIONS

### 2.1 General

1. The following categories of commission applicable to the Derivatives Market are commissions payable to ATHEX and ATHEXClear at a ratio of thirty percent (30%) and seventy percent (70%) respectively:

- a) Transaction commissions
- b) Transaction cancellation commissions
- c) Commissions on Stock Repos and Stock Reverse Repos

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<sup>58</sup> A new paragraph 5 was added to article 1.1 of Part 2 and the subsequent paragraphs were renumbered as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the calendar month following the calendar month of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>59</sup> A new paragraph 2 was added to article 1.1.3 as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 24.12.2024.

<sup>60</sup> Paragraph 13 of article 1.1, Part 2 was abolished by virtue of the decision dated 22/10/2015 of the Stock Markets Steering Committee of ATHEX, with effect as of 2/11/2015.

d) Commissions on bilateral securities or lending or borrowing on the basis of Method 4 agreements<sup>61</sup>

e)<sup>62</sup>

Specifically in the case of the "On Behalf of Trader" service, the commission for its use is payable solely to ATHEX.<sup>63</sup>

2. The commissions are determined in accordance with the stipulations of "TABLE 1", as in force from time to time, which is attached to and forms an integral part of this Resolution. "TABLE 1" may be amended, in accordance with the terms hereof, by the competent services of ATHEX or ATHEXClear.

3. The commissions become due and payable, depending on each type, at the times stipulated in this Resolution.

4. Commissions are paid:

a) by ATHEXClear Members,

b) through the Cash Settlement Accounts kept at the cash settlement Agencies as specified by HELEX in accordance with its procedures.

5. ATHEXClear is responsible for collecting the above commissions payable to ATHEX and remitting them to ATHEX, according to the percentage distribution of paragraph 1.1.

## **2.2 TRANSACTION COMMISSIONS**

1. Transaction commissions are classified into:

a) commissions on trades transacted,

b) commissions upon expiration of a Futures Contract and on exercise or assignment of Options.

c) commissions on trades transacted through Standard Combinations ("Time Spreads")

Where the term "commissions on trades transacted" is used in this Resolution, it shall mean both (a) & (c) above or one of them as the case may be.<sup>64</sup>

2. Commissions on trades transacted are calculated by the System on a daily basis per trade.

3. Commissions upon expiration or on exercise are calculated by the System at the time of expiration or exercise per open position.

4. Transaction commissions are further classified into:

a) commissions on clients' transactions,

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<sup>61</sup> Instance d) of paragraph 1 of article 2.1 of Part 2 was amended as above by virtue of decision 201/15.04.2024 of the Stock Markets Steering Committee of ATHEX, with effect as of 13.05.2024.

<sup>62</sup> Instance e) of subparagraph 2.1, paragraph 1, Part 2 was abolished by virtue of the decision dated 8/07/2015 of the Stock Markets Steering Committee of ATHEX, with effect as of 13/07/2015.

<sup>63</sup> This paragraph was added by virtue of the decision dated 8/07/2015 of the Stock Markets Steering Committee, with effect as of 13/07/2015.

<sup>64</sup> New elements were added to paragraph 2.2 of Part 2 as above by virtue of decision 192/11.04.2023 of the Stock Markets Steering Committee of ATHEX with effect as of 10.05.2023.

b) commissions on market-making transactions.

5. Transaction commissions, other than market-making transaction commissions, are paid as follows depending on their type:

a) Commissions on trades transacted are paid on the business day following their execution in accordance with the cash settlement procedure of the day in question.

b) Commissions upon expiration of Futures Contracts and on exercise of Options are paid on the day of settlement of the rights and obligations emanating from such expiration or exercise, as specified on the basis of the admission characteristics of the respective derivatives.

6. Commissions on market-making transactions, as same result for each calendar month, are paid on the first (1<sup>st</sup>) business day of the calendar month following the reference month.

## 2.2.2 COMMISSIONS ON CLIENTS' TRANSACTIONS

### 2.2.2.1 Commissions on clients' transactions

1. Commissions on clients' transactions are the commissions charged for derivatives transactions carried out by Derivatives Market Members on behalf of their clients or on own account.

2. The amount of commissions on clients' transactions is determined in accordance with "**TABLE 1**" attached hereto. Specifically in the case of Stock Futures, the amount of the aforesaid commissions is subject to the monthly recalculation procedure in accordance with subparagraph 2.2.2.2.

3. In every case, the respective charge is calculated per contract, except for Options.<sup>65</sup>

4. Stock Options and FTSE/ATHEX-Large Cap Index Options are priced in basis points at the premium (transaction price \* contract size \* number of contracts) of each transaction, as defined in the table below:<sup>66,67</sup>

### 2.2.2.2 Monthly recalculation procedure for commissions on clients' transactions applicable to Stock Futures

| Product                            | Trading and clearing commission in basis points (on premium) |
|------------------------------------|--|
| Stock Options                      | 100 basis points (0.010) <sup>68</sup>                       |
| FTSE/ATHEX-Large Cap Index Options | 75 basis points (0.0075)                                     |

1. Specifically in the case of Stock Futures, the amount of commissions listed in "**TABLE 1**" is calculated on a monthly basis in accordance with the following procedure:

<sup>65</sup> New elements were added at point 3 of 2.2.2.1. as above by virtue of decision 213/124.07.2025 of the Stock Markets Steering Committee of ATHEX with effect as of 01.08.2025.

<sup>66</sup> For the period from 01.08.2025 to 30.1.2026, the commissions for all Options are zero pursuant to decision 213/24.07.2025 of the Stock Markets Steering Committee of ATHEX with effect as of 01.08.2025.

<sup>67</sup> The table was amended as above by virtue of decision 213/124.07.2025 of the Stock Markets Steering Committee of ATHEX with effect as of 01.08.2025.

<sup>68</sup> The table was amended as above by virtue of decision 472/31.03.2026 of the Stock Markets Steering Committee of ATHEX with effect as of 01.04.2026.

a) On the last business day of each calendar month, ATHEX calculates and announces the Average Adjusted Closing Price of each underlying stock during the previous month. For the purposes hereof, Average Adjusted Closing Price means the weighted average of closing prices of the underlying stock in the calendar month of calculation as adjusted in cases of corporate actions which take place during the relevant calculation period in respect of the underlying stock and affect its characteristics.

b) On the basis of the Average Adjusted Closing Price of the stock, ATHEX recalculates the amount commission on clients' transactions in Futures Contracts on the respective stock for the current month. More specifically, the commission on clients' transactions in Futures Contracts on the underlying stock is set for the reference month as the amount that corresponds, on the basis of price intervals, to the Average Adjusted Closing Price of the stock in accordance with the Table of subparagraph 2.

2. Commissions on clients' transactions in Stock Futures are calculated in accordance with subparagraph 1 for each calendar month on the basis of the following Average Adjusted Closing Price scale:

| <b>Low Price<br/>(in €)</b> | <b>High Price<br/>(in €)</b> | <b>Commission<br/>(in €)</b> |
|-----------------------------|------------------------------|------------------------------|
| 0.01                        | 0.49                         | 0.05                         |
| 0.50                        | 0.99                         | 0.10                         |
| 1.00                        | 1.99                         | 0.15                         |
| 2.00                        | 4.99                         | 0.20                         |
| 5.00                        | 9.99                         | 0.30                         |
| 10.00                       | 19.99                        | 0.75                         |
| 20.00                       |                              | 1.20                         |

3. If, during the calculation period in accordance with subpar. 1 and 2, a corporate action has taken place which entails a reduction in the size of the Futures Contract on the underlying stock, the commission on clients' transactions in the relevant Contracts is calculated at a fixed rate of €0.05 per Contract for all series affected by the corporate action as follows:

a) If there are open positions in all the series affected by the corporate action, the above commission applies until expiry of all the relevant series.

b) If there are open positions in Contracts in only some of the series affected by the corporate action, the above commission applies until expiry of the last of the series in which there are open positions. Upon expiry of the aforesaid last series, the commission on clients' transactions for series which have been affected by the corporate action but did not have open positions is calculated in accordance with par. 1 and 2 as of the next session immediately following the day of expiry of the aforesaid last series. In such a case, the Average

Adjusted Closing Price for the first month following the day of expiry of the aforesaid last series shall be that of the calendar month preceding the month of expiry of the aforesaid last series.<sup>69</sup>

### 2.2.2.3 Discount on commissions for clients' transactions in Stock Futures

1. Depending on the trading volume per investor code and per underlying security, a percentage discount is calculated and applied to commissions for Stock Futures, in accordance with the following table:

| Number of Contracts | Discount |
|---------------------|----------|
| 1 - 500             | 0%       |
| 501 - 1000          | 30%      |
| 1001 - 1500         | 40%      |
| 1501 - 2000         | 50%      |
| 2001 - 4000         | 60%      |
| 4001 - 5000         | 70%      |
| 5001 -              | 80%      |

2. It should be noted that the aforesaid percentage discounts are applied to the total number of contracts to which they correspond rather than on a tiered basis. More specifically, the commission is calculated by multiplying the number of contracts and the commission corresponding to the respective product, in accordance with the table of commissions for clients' transactions in Stock Futures, multiplied by the percentage discount corresponding to the respective interval.

### 2.2.2.4 Commissions for clients' transaction in Futures Contracts on the FTSE/ATHEX Large Cap Index

1. Commissions for Futures Contracts on the FTSE/ATHEX Large Cap Index are calculated on a daily basis, at end-client level and according to the number of contracts, as per the following table:

| Number of Contracts/day | Commission (€) |
|-------------------------|----------------|
| 1 - 250                 | 0.80           |
| 251 - 400               | 0.70           |
| 401 - 500               | 0.60           |
| 501 - 1000              | 0.40           |
| 1001 - 1500             | 0.15           |
| 1501 - 2500             | 0.10           |
| 2501 -                  | 0.08           |

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<sup>69</sup> Paragraph 2.2.2.2 of Part 2 was replaced as above by virtue of decision 180/29.04.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 05.05.2021.

2. It should be noted that the aforesaid commissions are applied to the total number of contracts to which they correspond rather than on a tiered basis. More specifically, the commission charges are calculated as the product of the number of contracts and the commission corresponding to the respective interval.

#### 2.2.2.5 Commissions for clients' transactions in Futures Contracts on the FTSE/ATHEX Banks Index<sup>70</sup>

Commissions for Futures Contracts on the FTSE/ATHEX Banks Index are calculated on a daily basis per Member at end-client level as the product of the number of contracts and the commission shown in the following table:

| Number of contracts/day | Commission (€) |            |
|-------------------------|----------------|------------|
|                         | Trading        | Expiration |
|                         | 1,20           | 1,20       |

#### 2.2.2.6 Commissions for clients' transactions in Future Contracts on the MSCI Greece Rebased Index<sup>71</sup>

Commissions for Future Contracts on the MSCI Greece Rebased Index are calculated on a daily basis per Member at end-client level, as the product of the number of contracts and the respective commission in accordance with the following table:<sup>72</sup>

| Number of Contracts/day                           | Commission (€)    |            |  |
|---|-------------------|------------|--|
|   | Trades transacted | Expiration | Trades transacted through Standard Combinations (Time Spreads) |
| Future Contracts on the MSCI Greece Rebased Index | 1,00              | 1,00       | 0,50   |

<sup>70</sup> A new paragraph 2.2.2.5 was added to article 2 as above by virtue of decision 181/15.06.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 28.06.2021.

<sup>71</sup> A new paragraph 2.2.2.6 was added to Article 2 of Part 2 as above by virtue of decision 192/11.04.2023 of the Stock Markets Steering Committee of ATHEX with effect as of 10.05.2023.

<sup>72</sup> For the period from 01.08.2025 to 30.1.2026, the commissions on the MSCI Greece Rebased Index are zero pursuant to decision 213/24.07.2025 2023 of the Stock Markets Steering Committee of ATHEX.

## 2.2.3 COMMISSIONS ON MARKET-MAKING TRANSACTIONS

### 2.2.3.1 Commissions on market-making transactions

1. Commissions on market-making transactions are the commissions charged for derivatives transactions carried out by Market Makers (in derivatives) in fulfillment of their market-making obligations with respect to listed derivatives (hereinafter "market-making transactions").
2. Commissions on market-making transactions are calculated in accordance with the stipulations of subparagraph 2.2.3.2.
3. Commissions upon expiration or exercise in respect of market-making transactions are calculated per contract and per position in accordance with the stipulations of "TABLE 1" attached hereto.
4. Stock Options and FTSE/ATHEX-Large Cap Index Options are priced in basis points at the premium (transaction price \* contract size \* number of contracts) of each transaction, as defined in the table below.<sup>7374</sup>

| Product                            | Trading and clearing commission in basis points<br>(on premium) |
|------------------------------------|---|
| Stock Options                      | 10 basis points (0.001) <sup>75</sup>                           |
| FTSE/ATHEX-Large Cap Index Options | 15 basis points (0.0015)  |

5. For information purposes, "TABLE 1" also includes the commissions paid to HELEX in its capacity as a central securities depository in relation to the deliveries of underlying securities upon expiry or exercise of rights on derivatives.

### 2.2.3.2 Procedure for calculating commissions on market-making transactions

Commissions on market-making transactions are calculated for each Market Maker per calendar month, taking account of all market-making transactions performed by a Market Maker in the respective month. The calculation procedure is as follows:

#### 2.2.3.2.1 Step (1): Initial Charge

1. The initial charge is calculated for market-making transactions carried out in the respective month. Initial charge shall mean the monetary amount calculated as the product of the total number of contracts in listed derivatives, which the Market Maker acquired as a result of its market-making transactions during the month in question, and the fixed charge per contract as stipulated in "TABLE 1" attached hereto. This charge is the aggregate of daily charges, as these arise for the Market Maker on the basis of its market-making transactions during the relevant month.

<sup>73</sup> For the period from 01.08.2025 to 30.1.2026, the commissions on the MSCI Greece Rebased Index are zero pursuant to decision 213/24.07.2025 2023 of the Stock Markets Steering Committee of ATHEX.

<sup>74</sup> The table was amended as above by virtue of decision 213/24.07.2025 of the Stock Markets Steering Committee of ATHEX with effect as of 01.08.2025.

<sup>75</sup> The table was amended as above by virtue of decision 472/31.03.2026 of the Stock Markets Steering Committee of ATHEX with effect as of 01.04.2026.

2. Specifically in the case of market-making transactions in Futures Contracts on the FTSE/ATHEX Large Cap Index, the following charges are applicable, depending on the number of contracts concluded by the Market Maker on a daily basis:

| Number of Contracts/day | Commission (€) |
|-------------------------|----------------|
| 1 - 250                 | 0.25           |
| 251 - 300               | 0.20           |
| 301 - 1000              | 0.18           |
| 1001 - 2000             | 0.08           |
| 2001 -                  | 0.05           |

3. It should be noted that the aforesaid commissions are applied to the total number of contracts to which they correspond rather than on a tiered basis. More specifically, the commission charges are calculated as the product of the number of contracts and the commission corresponding to the respective interval.

4. Specifically in the case of market-making transactions in Futures Contracts on the FTSE/ATHEX Banks Index, the following charges are applicable, depending on the number of contracts concluded by the Market Maker on a daily basis:<sup>76</sup>

| Number of contracts/day | Commission (€) |            |
|-------------------------|----------------|------------|
|                         | Trading        | Expiration |
|                         | 0,40           | 0,40       |

5. In the case of market-making transactions in Futures Contracts on the MSCI Greece Rebased Index, the following charges are applicable, depending on the number of contracts concluded by the Market Maker on a daily basis<sup>778</sup>:

| Number of Contracts/day | Commission (€) <sup>79</sup> |            |                                    |
|-------------------------|------------------------------|------------|------------------------------------|
|                         | Trades transacted            | Expiration | Trades transacted through Standard |
|                         |                              |            |                                    |

<sup>76</sup> A new subparagraph 4 was added to paragraph 2.2.3.2.1 as above by virtue of decision 181/15.06.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 28.06.2021.

<sup>77</sup> A new subparagraph 5 was added to paragraph 2.2.3.2.1 as above by virtue of decision 192/11.04.2023 of the Stock Markets Steering Committee of ATHEX with effect as of 10.05.2023.

<sup>78</sup> For the period from 01.08.2025 to 30.1.2026, the commissions on the MSCI Greece Rebased Index are zero pursuant to decision 213/24.07.2025 of the Stock Markets Steering Committee of ATHEX.

<sup>79</sup> For the period from 01.06.2023 to 15.09.2023 the Special Negotiation supplies are zero by virtue of decision 193/31.05.2023 of the Stock Markets Steering Committee of ATHEX

|  |      |      |                                    |
|--|------|------|------------------------------------|
|  |      |      | <b>Combinations (Time Spreads)</b> |
| <b>Future Contracts on the MSCI Greece Rebased Index</b> | 0,50 | 0,50 | 0,25                               |

### 2.2.3.2.2 Step (2): Discounts based on monthly contract volume

1. A discount is applied to the monetary amount calculated in accordance with Step 1, based on the total monthly volume of contracts in listed derivatives, which the Market Maker acquired as a result of its market-making transactions during the respective month.
2. The percentage discounts on the initial charge are tiered according to each listed derivative and each total monthly volume level, as per the following table:

| <b>Options on FTSE/ATHEX-Large Cap Index</b>    |             |                |                |         |
|---|-------------|----------------|----------------|---------|
| Volume of Options on FTSE/ATHEX-Large Cap Index | 4,000-8,000 | 8,001 – 15,000 | 15,001- 20,000 | >20,000 |
| Percentage Discount for the respective volume   | 25%         | 50%            | 75%            | 100%    |
| <b>Stock Futures</b>                            |             |                |                |         |
| Volume of Stock Futures                         | 2,000-5,000 | 5,001 – 10,000 | 10,001- 20,000 | >20,000 |
| Percentage Discount for the respective volume   | 25%         | 50%            | 75%            | 100%    |
| <b>Stock Options</b>                            |             |                |                |         |
| Volume of Stock Options                         | 2,000-4,000 | 4,001 – 8,000  | 8,001- 15,000  | >15,000 |
| Percentage Discount for the respective volume   | 25%         | 50%            | 75%            | 100%    |

The percentage discounts for Stock Futures shall apply only when the initial charge ceases to be zero.

### 2.2.3.2.3 Step (3): Discounts on account of concurrent Market Making in Futures and Options having the same underlying asset.

1. These discounts apply to market-making transactions of a Market Maker when the relevant transactions relate to Futures and Options with the same underlying asset.
2. The percentage discounts for each underlying asset are listed in the following table:

| Underlying Asset | Futures | Options | Both |
|------------------|---------|---------|------|
| FTSE-Large Cap   | 0%      | 0%      | 5%   |
| National Bank    | 0%      | 0%      | 5%   |
| Alpha Bank       | 0%      | 0%      | 5%   |
| OPAP             | 0%      | 0%      | 5%   |
| PPC              | 0%      | 0%      | 5%   |
| OTE              | 0%      | 0%      | 5%   |
| Piraeus Bank     | 0%      | 0%      | 5%   |

3. The above percentages are aggregated on the basis of the total number of above-mentioned underlying assets for which the Market Maker has simultaneously assumed market-making obligations in Futures and Options, resulting in the total percentage discount.

4. The total percentage discount to which a Member is entitled can under no circumstances exceed fifty percent (50%).

5. The total percentage discount is applied per calendar month to the monetary amount calculated in accordance with Step 2, in respect of each separate futures contract and option with the same underlying asset for which the Member has undertaken market-making obligations.

#### 2.2.3.2.4 Step (4): Alert fees

1. Fees for alerts, as activated in accordance with the admission characteristics of the respective derivatives, are calculated for each Market Maker per calendar month, taking account of all alerts activated for a Market Maker during the month in question. Alert fees are applied to each listed derivative on the basis of the total monthly number of market-making alerts. More specifically, alert fees for each listed derivative are calculated as the product of the total monthly number of alerts and the value that corresponds to the respective interval, as per the following table:

| Futures on the FTSE-Large Cap index |      |               | Options on the FTSE-Large Cap index |       |               |
|-------------------------------------|------|---------------|-------------------------------------|-------|---------------|
| From                                | To   | Fee per alert | From                                | To    | Fee per alert |
| 0                                   | 650  | 0             | 0                                   | 3430  | 0             |
| 651                                 | 1300 | 2             | 3431                                | 6860  | 0.30          |
| 1301                                | 1950 | 3             | 6861                                | 10290 | 0.40          |

| Futures on the FTSE-Large Cap index                 |      |               | Options on the FTSE-Large Cap index                        |       |               |
|---|------|---------------|--|-------|---------------|
| 1951  | 2600 | 4             | 10291  | 13720 | 0.50          |
| 2601  | ∞    | 5             | 13721  | ∞     | 0.60          |
| Stock Futures                                       |      |               | Stock Options  |       |               |
| From  | To   | Fee per alert | From   | To    | Fee per alert |
| 0   | 430  | 0             | 0  | 3000  | 0             |
| 431   | 860  | 0.50          | 3001   | 6000  | 0.15          |
| 861   | 1290 | 0.75          | 6001   | 9000  | 0.20          |
| 1291  | 1720 | 1             | 9001   | 12000 | 0.25          |
| 1721  | ∞    | 1.25          | 12001  | ∞     | 0.30          |
| Futures on the FTSE/ATHEX Banks Index <sup>80</sup> |      |               | Futures on the MSCI Greece Rebased Index <sup>81, 82</sup> |       |               |
| From  | To   | Fee per alert | From   | To    | Fee per alarm |
| 0   | 650  | 0             | 0  | 1300  | 0             |
| 651   | 1300 | 2             | 1301   | 2600  | 2             |
| 1301  | 1950 | 3             | 2601   | 3900  | 3             |
| 1951  | 2600 | 4             | 3901   | 5200  | 4             |
| 2601  | ∞    | 5             | 5201   | ∞     | 5             |

#### 2.2.4 Transaction Cancellation Commissions

1. The commission for cancellation of transactions is set as follows:

- a) **€30** lump-sum charge payable by the Member that requested or is responsible for the cancellation.
- b) **€10** per cancelled trade, irrespective of the number of contracts involved in the cancellation.
- c) **€200** maximum charger per Member.

This commission also applies to cases of forced cancellation of transactions on Futures Contracts (FCLs) on Shares and Indices, following a request from one of the Members who participated in its preparation, which is carried out at a deviating price that may disrupt the smooth operation of the market, in accordance with the provisions of § 2.6.6 of the ATHEX Rulebook and a relevant ATHEX Decision.<sup>83</sup>

<sup>80</sup> A new field was added to the Table of subparagraph 1, paragraph 2.2.3.2.4 of article 2 as above by virtue of decision 181/15.06.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 28.06.2021.

<sup>81</sup> A new field was added to the Table of subparagraph 1, paragraph 2.2.3.2.4 of article 2 as above by virtue of decision 192/11.04.2023 of the Stock Markets Steering Committee of ATHEX with effect as of 10.05.2023.

<sup>82</sup> The fields of Table "Futures on the MSCI Greece Rebased Index" of subparagraph 1, paragraph 2.2.3.2.4 of article 2 were amended as above by virtue of decision 203/26.09.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.10.2024.

<sup>83</sup> New paragraph was added as above by virtue of decision 213/24.07.2025 of the Stock Markets Steering Committee of ATHEX with effect as of 01.08.2025.

## 2.2.5 Commissions for Stock Repos or Stock Reverse Repos concluded in the Securities Lending Mechanism of ATHEX

1. The commissions for such contracts are as follows:

| Product             | Transaction Type   | Commission                          |
|---------------------|--|-------------------------------------|
| Stock Repos         | Monthly Clearing/Exercise  | 10% of revenue per client           |
| Stock Reverse Repos | Transaction (for investors and Traders)  | 0.03% of the transaction value      |
|                     | Transaction (for Market Makers)  | 0.015% of the transaction value     |
|                     | Exercise by Borrower   | 0                                   |
|                     | Exercise by ATHEXClear   | 0                                   |
|                     | Transaction concluded for the immediate delivery of securities to the Borrower | €50 additional charge for the buyer |

## 2.2.6 Commissions for Bilateral Lending or Borrowing Agreements

### 2.2.6.1 Annual support cost for bilateral lending or borrowing agreements

1. In the case of bilateral lending or borrowing agreements whose underlying assets are shares for which market-making obligations have been or are to be undertaken and which belong to the Main Market segment and do not constitute the underlying asset or participate in an index that constitutes the underlying asset of a Derivative, the annual support cost for the Market Maker in Securities which performs the respective market making and makes use of the aforesaid agreements shall amount, for each type of underlying share, to one thousand euros (€1,000). The same annual support cost of one thousand euros (€1,000) also applies to an ETF Market Maker that deals in bilateral lending or borrowing agreements whose underlying assets are shares that belong to the Main Market segment and do not constitute the underlying asset or participate in an index which constitutes the underlying asset of a Derivative and which are components of indexes tracked by ETFs whose Units are traded by the aforesaid ETF Market Maker.

2. The support cost includes clearing organization and support services, as well as the training of a company's officers in the use of the aforesaid agreements.

3. The above amount is calculated on a pro rata basis from commencement of the Market Maker's obligations and entry of the relevant agreements in the System and up to the end of the year. In the event that a Market Maker's obligations cease, the amount attributable to the Member up to the end of the year shall be reimbursed.

## 2.2.6.2 Transaction commissions

2.2.6.2.1 The commissions on bilateral lending or borrowing agreements on the basis of Method 4<sup>84</sup> are as follows:

| Commission Type   |                   | Commission                             |                       |
|---|-------------------|--|-----------------------|
| Conclusion of Transaction   | Transaction Value | Commission for Borrower                | Commission for Lender |
|   | Up to €15,000     | €4.50                                  | €0                    |
|   | Over €15,000      | 0.03% of transaction value             | €0                    |
| Conclusion of Transaction with immediate delivery of securities to the Borrower |                   | €50 additional charge for the Borrower |                       |
| Exercise of Right of Return by the Lender or Borrower                           |                   | 0                                      |                       |

1. The commissions relate to the following separate Methods:

- a) Method 8-3-1: Bilateral lending or borrowing that involves Simple Block Trades
- b) Method 8-3-2: Bilateral lending or borrowing that involves Market Makers
- c) Method 4: Hit & Take<sup>85</sup>

2.2.6.2.2 The commissions on lending or borrowing agreements based on Aggregated Lending Orders placed to cover Failed Trades and outstanding clearing issues in general are as follows:

| Commission Type  | Commission for Clients/Traders/Market Makers |  |                       |
|--|--|--|-----------------------|
| Conclusion of Transaction  | Transaction Value                            | Commission for Borrower                | Commission for Lender |
|  | Up to €15,000                                | €6                                     | €0                    |
|  | Over €15,000                                 | 0.04% of transaction value             | €0                    |
| Conclusion of Transaction with same day (immediate) delivery of securities to the Borrower |  | €50 additional charge for the Borrower |                       |

<sup>84</sup> The title of paragraph 2.2.6.1 of article 2.2.6.2 of Part 2 was amended as above by virtue of decision 201/15.04.2024 of the Stock Markets Steering Committee with effect as of 13.05.2024.

<sup>85</sup> Field c) was added to paragraph 2.2.6.1 of article 2.2.6.2 of Part 2 as above by virtue of decision 201/15.04.2024 of the Stock Markets Steering Committee with effect as of 13.05.2024.

| Commission Type                                       | Commission for Clients/Traders/Market Makers |
|---|--|
| Exercise of Right of Return by the Lender or Borrower | 0  |

### PART 3. COMMISSION FOR TRADING SUPPORT PROCEDURE

#### Article 1. Commission for Trading Support Procedure in ATHEX Markets and the Securities Lending Mechanism

1. A Member that uses the Trading Support Procedure for a reason not due to a technical malfunction of ATHEX-Net, such as – by way of example – on account of a malfunction in the Member's internal network or the absence of its Certified Trader, will be charged a special commission.
2. The commission is calculated per each order of the Member which is transmitted for execution by the competent services of ATHEX or, in the case of a Member's order entered in the Order Book, which is amended or cancelled by the aforesaid services at the Member's request.
3. The amount of the commission per order, both in the case of orders in the Main Board and orders in the Pre-Agreed Trades Board or the Special Terms Board<sup>86</sup>, increases according to the number of orders to which it relates, as follows:

| Number of Orders | Charge |
|------------------|--------|
| 1 to 10          | €10    |
| 11 to 50         | €20    |
| 51 and over      | €30    |

### PART 4. CHARGES FOR THE PROVISION OF STATISTICAL INFORMATION PRODUCTS

1. The charges imposed by ATHEX on Members, Issuers and investors (SMEs, Vendors, Investing Public and Academic Community) for the provision of statistical information products (for all product categories), either through subscriptions or in response to ad hoc requests, are listed in a table posted on the Athens Exchange website under the section "Charges – Fee Schedule" ([www.athexgroup.gr/StatProducts](http://www.athexgroup.gr/StatProducts)).
2. The same table also provides detailed information about how to acquire the products (e-mail request, subscription-based contract), the necessary supporting documents (as required, depending on the selected product category) which must be submitted by the client, the payment method and any relevant discounts.

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<sup>86</sup> Paragraph 3 of Article 1 of Part 3 was amended as above by virtue of decision 201/15.04.2024 of the Stock Markets Steering Committee with effect as of 13.05.2024.

3. ATHEX reserves the right to update the aforementioned table at regular intervals, changing prices according to the information needs of the stock exchange community but also current economic trends, as well as to add new products to the table along with their respective charges.

4. ATHEX reserves the right to extend/modify its relevant discounts for longer periods as it sees fit, so as to enable potential clients to acquire the product in which they are interested at even better prices.

5. The Executive Director who is competent for the organisational unit that is responsible for the provision of statistical information products, is authorised to update the charges and enrich/amend the relevant discounts, in accordance with paragraphs 3 and 4 above.<sup>87</sup>

## PART 5. CHARGES FOR THE PROVISION OF TECHNOLOGY SERVICES BY ATHEX

### Article 1. Technology Service Categories

#### 1.1 Definitions

1. For the purposes hereof, the following terms shall have the respective meanings set forth below:

**Electronic Operations Flow and Form Distribution System or HERMES System or HERMES:** the electronic system used by ATHEX to connect and communicate with listed companies via the Internet.

**Technology Services:** the technology services in the framework of IT & Communication systems/applications, which are provided by ATHEX to its Members but also to any other agency/entity (companies of the Group, Participants, Clearing Members<sup>88</sup>, Listed Companies etc.) which acquires the right to use them. These services include, inter alia, the supply of hardware and software, the necessary services of initial installation, management and operation, as well as the provision of technical assistance and support to users.

**Technology Service Users:** ATHEX members, Participants, Clearing Members<sup>89</sup>, Listed Companies and any other agency/entity that acquires the right to use the technology services provided by ATHEX.

**User Access Solution:** the selection, installation and configuration of technical equipment (hardware, software, network interfaces, etc.) provided or specified by ATHEX which is necessary for efficient, reliable and secure user access to ATHEX technology services.

**Technology Service Category:** each thematically distinct category of technology services provided by ATHEX (e.g. ATHEX-Net connection services, OASIS services, HERMES services, etc.) which is included as an annex hereto and forms an integral part hereof.

**Accompanying Documents:** all kinds of texts relating to the procedures and documentation which accompany this resolution and its annexes as an integral part thereof.

**Reference Documents:** all kinds of written technical instructions and specifications, procedures (forms, etc.) and documentation (user manuals, etc.) to which reference is made in this resolution and its annexes

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<sup>87</sup> Paragraph 5 of Part 4 was added by virtue of decision 189/22.12.2022 of the Stock Markets Steering Committee of ATHEX with effect as of 02.01.2023.

<sup>88</sup> Subparagraph 2 of paragraph 1 of article 1.1 of Part 5 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>89</sup> Subparagraph 3 of paragraph 1 of article 1.1 of Part 5 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

but do not form integral parts thereof. The updated versions of Reference Documents will be posted on the ATHEX website. These documents include, inter alia, all necessary details and specific information (technical instructions, specifications, etc.) to effectively sustain the entire "life cycle" (installation, activation, use, administration/operation, maintenance/upgrading, support, deactivation, de-installation) of the technology services provided to the respective recipients/users.

## 1.2 Categories

The following separate categories of technology services are available:

1. "ATHEX-Net connection services". For details of the charges for these services, see article 2 below as well as the Annex hereto. For a description of the services and details of the relevant accompanying/reference documents, see Resolution No. 21.
2. "OASIS (Securities & Derivatives Subsystem) technology services provided by ATHEX". For details of the charges for these services, see article 3 below as well as the Annex hereto. For a description of the services in respect of the Securities Subsystem and details of the relevant accompanying/reference documents, see Resolution No. 21.
3. "DSS technology services". For details of the charges for these services, see article 4 below as well as the Annex hereto.
4. "HERMES technology services provided by ATHEX". For details of the charges for these services, see article 6 below. For a description of the services and details of the relevant accompanying/reference documents, see Resolution No. 21.
5. Lastly, article 5 includes new technology services provided to ATHEX-Net users (e.g. hosting services at the Group's Data Centers), or services provided supplementary to ATHEX-Net connectivity services (e.g. technical administration of ATHEX-Net user node, access to the test environment of the Securities or Derivatives Markets, etc.).

## Article 2. ATHEX-Net connectivity services<sup>90</sup>

### 2.1 General

1. Each ATHEX Member/ATHEXCSD Participant may have access to the System through only one ATHEX-Net connection node, according to the charges described in paragraph 2.2.
2. For the use of a node to meet regular or urgent needs, the ATHEX Member/ATHEXCSD Participant will be charged for its connection to ATHEX-Net as per the amounts stipulated in paragraph 2.2.
3. The node is administered by ATHEX, which for the provision of services to ATHEX-Net users is paid fees by ATHEX Members. The fee amounts are determined on the basis of the geographical location in which the

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<sup>90</sup> At meeting 165/5.10.2018 of the Stock Markets Steering Committee of ATHEX it was decided to grant a discount of €1,000 per quarter and €4,000 per year in total to all Members (irrespective of realized turnover) on the charges set forth in this Part of the resolution, provided the Members have discharged their financial obligations to the Group. This discount applies only to financial year 2018.

service users have their registered office, as well as the technical specifications of the node through which they are connected to ATHEX-Net.<sup>91</sup>

## 2.2 ATHEX-Net user connectivity services

This connection is a prerequisite for ATHEX Members and ATHEXCSD Participants<sup>92</sup> (as well as any other agency receiving the relevant approval from ATHEX) in order for them to gain access to the technology services in the framework of the IT & Communication systems/applications which are provided via ATHEX-Net, such as OASIS and the DSS. For a detailed description of the ATHEX-Net user connection services provided, see Resolution No. 21.

The following ATHEX-Net node types are supported, not including those cases involving the connection of **(a)** ATHEX-Net users from abroad, **(b)** Independent Software Vendors (ISVs) and **(c)** Disaster Recovery-type nodes for which the interface model for connection with ATHEX-Net applies with some slight variations:

**1. Type 1.a.1:** Configuration of one (1) Cisco ISR4331 router, one (1) Catalyst 2960 switch, and one (1) Metro Ethernet telecommunication circuit,

**2. Type 1.a:** Configuration of one (1) Cisco ISR4331 router, one (1) Catalyst 2960 switch, and two (2) Metro Ethernet telecommunication circuit, and

**3. Type 2.a:** Configuration of two (2) Cisco ISR4331 routers, two (2) Catalyst 2960 switches, and two (2) Metro Ethernet telecommunication circuits.

In cases where ATHEX-Net users are connecting from abroad, the User must procure only the Cisco ISR4331 router and at least one (1) high-speed telecommunication circuit.

In cases where ISVs are connecting, as well as Disaster Recovery-type nodes, the User may – on its own responsibility – procure only one of the two telecommunication circuits, which means that in effect the permitted ATHEX-NET user node-type configurations are 1.a, 1.a1 and 2.a.

In cases where ATHEX-Net users are connecting from Greece or abroad for the ATHEX FIX Trading service, in addition to the permitted ATHEX-NET user node-type configurations, it is also possible to connect via Internet but solely with use of an IPSec Lan-to-Lan VPN tunnel.

In all cases of connection to ATHEX-Net, the entire cost of procuring active equipment is borne by Users.

For the use of ATHEX-Net by Members, there is a rebate of €4,000/year. More specifically, the amount is returned at the end of each calendar year and applies only to Members that have discharged their financial obligations.<sup>93</sup>

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<sup>91</sup> Article 2.1 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>92</sup> The term 'Operators' was replaced by the term 'ATHEXCSD Participants' throughout this Resolution by virtue of decision 178/28.01.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 12.04.2021.

<sup>93</sup> A new paragraph 6 was added to article 2.2 of Part 5 as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2019.

The charges for the connectivity services provided to Users are described in the following paragraphs. For a summary listing of the above charges, see the Annex hereto.<sup>94</sup>

## 2.2.1 Athens Area

### 2.2.1.1 Installation of a new ATHEX-Net user node

The following charges apply:

- a) One-time installation fee, the total amount of which depends on the specific technical solution supplied by the providers Vodafone and NOVA<sup>95</sup>, plus the charge payable to ATHEX which amounts to €1,220.<sup>96</sup>
- b) Fixed monthly telecommunications fee, in the amount of €340 for each of the two telecom circuits and €100 for each of the two ATHEX-Net connection ports allocated per User, for a total of **€880** per month.<sup>97</sup>

The aforesaid monthly connection service on the ATHEX side (corresponding to €100 for each ATHEX-Net connection port) is provided to ATHEX Members and ATHEXCSD Participants FREE OF CHARGE for the first node.

### 2.2.1.2 ATHEX-Net user node transfer

The following charges apply:

- a) One-time fee for the transfer of a user node to an address where the providers have a point-of-presence, the total amount of which depends on the specific technical solution supplied by the providers Vodafone and NOVA<sup>98</sup>, plus the charge payable to ATHEX which amounts to €1,220.
- b) One-time fee for the transfer of a user node to an address where the providers have no point-of-presence, the total amount of which depends on the specific technical solution supplied by the providers Vodafone and NOVA<sup>99</sup>, plus the charge payable to ATHEX which amounts to €1,220.<sup>100</sup>

### 2.2.1.3 Conversion of user node type

The following charges apply:

- a) One-time fee for the conversion of an ATHEX-Net user node from type 1.a to type 2.a, which amounts to €1,220 and is charged exclusively to cover the labor cost of ATHEX's technicians.

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<sup>94</sup> Article 2.2 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>95</sup> Subparagraph a) of article 2.2.1.1 of Part 5 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>96</sup> Item a) of subparagraph 2.2.1.1, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>97</sup> Item b) of subparagraph 2.2.1.1, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>98</sup> Subparagraph a) of article 2.2.1.2 of Part 5 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>99</sup> Subparagraph b) of article 2.2.1.2 of Part 5 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>100</sup> Subparagraph 2.2.1.2, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

b) One-time fee for the conversion of an ATHEX-Net user node from type 2.a to type 1.a, which amounts to €1,220 and is charged exclusively to cover the labor cost of ATHEX's technicians.

#### 2.2.1.4 Disaster Recovery node creation (type 1.a, 1.a.1, 2.a.)

The following charges apply:

1. 1<sup>st</sup> connectivity option: Use of two (2) telecommunication circuits:

a) One-time installation fee, the total amount of which depends on the specific technical solution supplied by the providers Vodafone and NOVA<sup>101</sup>, plus the charge payable to ATHEX which amounts to €1,220.

b) Fixed monthly telecommunications fee, in the amount of €340 for each of the two telecom circuits and €100 for each of the two ATHEX-Net connection ports allocated per User, for a total of **€880** per month.<sup>102</sup>

2. 2<sup>nd</sup> connectivity option: Use of one (1) telecommunication circuit:

a) One-time installation fee, the total amount of which depends on the specific technical solution supplied by the provider Vodafone or NOVA<sup>103</sup>, plus the charge payable to ATHEX which amounts to €1,220.

b) Fixed monthly telecommunications fee, in the amount of €340 and €100 for the one ATHEX-Net connection port, for a total of **€440**.<sup>104 105</sup>

#### 2.2.2 Thessaloniki Area

The one-time installation fees and fixed monthly fees for new connections (including the Disaster Recovery node) are set on a case-by-case basis, depending on the particular connection type and eventual needs. On the ATHEX side, the monthly connection fee is set at €100 per ATHEX-Net connection port.

The minimum charge payable to ATHEX as a one-time installation fee is set at **€2,000**. This amount does not include any travel, accommodation expenses, etc. for ATHEX employees travelling to or staying in Thessaloniki.

Similarly, the one-time fees for transferring and converting an ATHEX-Net user node are set on a case-by-case basis, depending on specific needs.

For new connections:

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<sup>101</sup> Item a) of subparagraph 1 of article 2.2.1.4 of Part 5 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>102</sup> Item b) of clause 1, subparagraph 2.2.1.4, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>103</sup> Item a) of subparagraph 2 of article 2.2.1.4 of Part 5 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>104</sup> Item b) of clause 2, subparagraph 2.2.1.4, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>105</sup> Subparagraph 2.2.1.4, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

a) The one-off installation or transfer fees are set on a case-by-case basis, depending on the connectivity solution chosen. The minimum charge payable to ATHEX as a one-time installation fee is set at **€2,000**. This amount does not include any travel expenses for ATHEX employees travelling to the installation site, accommodation expenses, etc.

b) The fixed monthly connection fees are set on a case-by-case basis, depending on the specific connectivity solution. The charge per connection port is set at **€100**.

For further details, see the Annex hereto.<sup>106</sup>

### **2.2.3 ATHEX-Net user connectivity services in other areas of Greece**

The one-time installation fees and fixed monthly telecommunication fees for new connections (including the Disaster Recovery node) are set on a case-by-case basis, depending on the particular connection type that will be required. On the ATHEX side, the monthly connection fee is set at **€100** per ATHEX-Net connection port.

The minimum charge payable to ATHEX as a one-time installation fee is set at **€2,000**. This amount does not include any travel expenses for ATHEX employees travelling to the installation site, accommodation expenses, etc.

### **2.2.4 ATHEX-Net user connectivity services abroad**

The ATHEX-Net user connection node type may be 1.a, 1.a.1 or 2.a, in which the router and switch configuration requires only the procurement of a Cisco ISR4331 router.<sup>107</sup>

With regard to the telecom interface circuits, at least one (1) circuit is required with a speed equal to or higher than 2 Mbps.

In addition, an alternative connection method is available over the Internet (IPSec Lan-to-Lan VPN tunnel).

The total one-time installation fees and fixed monthly telecommunication fees for new connections are set on a case-by-case basis, depending on the particular connection type that will be required. On the ATHEX side, the monthly connection fee is set at **€100** per ATHEX-Net connection port.

Specifically in the case of connection over the Internet using the IPSec Lan-to-Lan VPN tunnel, the fixed monthly connection fee is €275.

The minimum charge payable to ATHEX as a one-time installation fee is set at €2,000. This amount does not include any travel expenses for ATHEX employees travelling to the installation site, accommodation expenses, etc.

### **2.2.5 ATHEX-Net connectivity services for ISVs**

#### **2.2.5.1 In the Athens area**

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<sup>106</sup> Subparagraph 2.2.2, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>107</sup> The first clause of subparagraph 2.2.4, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

1. 1<sup>st</sup> connectivity option: Use of two (2) telecommunication circuits:

a) One-time installation fee, the total amount of which depends on the specific technical solution supplied by the providers Vodafone and NOVA<sup>108</sup>, plus the charge payable to ATHEX which amounts to €1,220.

b) Fixed monthly telecommunications fee, in the amount of **€340** for each telecom circuit and **€100/ATHEX-Net connection port** (total of €200 for the two (2) ATHEX-Net ports occupied by each User). In total, **€880** per month.<sup>109</sup>

2. 2<sup>nd</sup> connectivity option: 1 wired telecommunication circuit (Vodafone<sup>110</sup>):

a) One-time installation fee, the total amount of which depends on the specific technical solution supplied by the provider Vodafone and NOVA<sup>111</sup>, plus the charge payable to ATHEX which amounts to €1,220.

b) Fixed monthly telecommunications fee, in the amount of **€340** and **€100** for the one ATHEX-Net connection port. In total, **€440** per month.<sup>112 113</sup>

### 2.2.5.2 In other areas of Greece (excluding Athens) and abroad

The one-time installation and fixed monthly fees are set on a case-by-case basis, depending on the type of connection required.

Apart from the leased circuit, an alternative connection method is also available over the Internet (IPSec Lan-to-Lan VPN tunnel).

The monthly connection fees on the ATHEX side are set at **€100** per ATHEX-Net connection port.

Specifically in the case of connection over the Internet using the VPN tunnel, the fixed monthly connection fee is **€275**.

The minimum charge payable to ATHEX as a one-time installation fee is set at **€2,000**. This amount does not include any travel expenses for ATHEX employees travelling to the installation site, accommodation expenses, etc.

### 2.3 ATHEX-Net connection/hosting services for Data Vendors

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<sup>108</sup> Item a) of subparagraph 1 of article 2.2.5.1 of Part 5 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>109</sup> Item b) of clause 1, subparagraph 2.2.5.1, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>110</sup> Subparagraph 2 of article 2.2.5.1 of Part 5 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>111</sup> Item a) of subparagraph 2 of article 2.2.5.1 of Part 5 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>112</sup> Item b) of clause 2, subparagraph 2.2.5.1, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>113</sup> Subparagraph 2.2.5.1, paragraph 2.2, article 2 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

The following three (3) ATHEX-Net connection/hosting solutions are available to Data Vendors.

In the case of existing Data Vendor connections (i.e. those installed prior to the entry into force of this resolution), the relevant charges other than the cost of hosting services (which is calculated on the basis of the U space occupied at the Group's Data Center) are covered by the annual fixed charge.

### **2.3.1 1<sup>st</sup> connectivity option (via Internet)**

The one-time installation fee is set at €300.

The fixed monthly connection fee is set at €150.

### **2.3.2 2<sup>nd</sup> connectivity option via Ethernet Interface)**

The one-time installation fee is set at €500.

The fixed monthly connection fee is set at €100 per network port.

Lastly, the fixed monthly hosting fee is set at €150/Rack Unit (per RU).<sup>114</sup>

## **Article 3. Technical Services in the ATHEX Trading System**

ATHEX gives Users of OASIS technical services the option to themselves install the necessary software for accessing the aforesaid services.

In cases where Users prefer the necessary software to be installed by ATHEX, the following charges apply.

### **3.1 Charges for the installation of software to meet regular or urgent needs**

In cases where a node is in operation to meet urgent needs (Disaster Recovery), the charge for changing the node settings to enable access to the Trading System is set at €100 per change (e.g. from Disaster to Production and conversely).

#### **<sup>115</sup>3.1.2 Installation of ORAMA terminal**

For each installation and configuration of an ORAMA terminal (in a production or test environment), the relevant charge is €100.

## **Article 4. Access of ATHEX Trading Members to the DSS<sup>116</sup>**

1. ATHEX Trading Members may access the DSS application in the standard role of Trading Member which serves transaction correction needs.

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<sup>114</sup> Paragraph 2.3, article 2 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>115</sup> Article 3.1.1 was removed as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>116</sup> Article 4 was replaced as above by virtue of decision 179/01.04.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 12.04.2021.

2. The first two (2) user licenses are provided free of charge.
3. For each DSS user license in addition to the above, the monthly charge is €100, plus VAT.
4. DSS user licenses are billed on a quarterly basis.
5. In the event of activation of additional DSS user licenses by a Member mid-year, the Member shall be billed according to the period of use of each license.
6. In the event of the return/cancellation of a DSS user license by a Member, the charge already paid for the respective license will be reimbursed to the Member on a pro rata basis according to the period of activation of the license.
7. For each electronic personal identification certificate issued for access to the DSS Service over the Internet, the annual charge is €40, plus VAT.
8. For the dispatch of the One Time Access Code, the charges stipulated in Resolution 18 of the Board of Directors of ATHEXCSD shall apply.

## Article 5. Other services provided

### 5.1 Maintenance, System Control and Hosting Services<sup>117</sup>

#### 5.1.1 Preventive maintenance and monitoring of the smooth functioning of <sup>118</sup>ATHEX FIX Trading service

1. The specific services include:
  - a) the installation of new software application versions (upgrades) for <sup>119</sup>ATHEX FIX Trading,
  - b) day-to-day system administration and
  - c) timely notification of any hardware malfunctions to Users' technical administrators for the purpose of their repair.
2. The relevant cost is **€100/ month**.<sup>120, 121</sup>

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<sup>117</sup> Paragraph 5.1 of article 5, Part 5 was repealed and paragraph 5.2 was renumbered as paragraph 5.1 as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 30.03.2020.

<sup>118</sup> The title of paragraph 5.1.1 of article 5.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>119</sup> Item a) of subparagraph 1 of paragraph 5.1.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>120</sup> Subparagraph 5.1.1, paragraph 5.1, article 5 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>121</sup> Subparagraph 2 of paragraph 5.1.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

### 5.1.2<sup>122</sup> ATHEX FIX Trading hosting for Members

This service involves the provision of a Server computing system for the installation of software for the ATHEX FIX Trading service for the Trading system and includes the following:

- ✓ Operating system upgrades
- ✓ Installation and upgrades of antivirus software
- ✓ Guarantee of good operation of system hardware, which includes the repair and/or replacement of components by the supplier (if required)

The relevant cost is **€200/month**.<sup>123, 124</sup>

### 5.1.3 Monitoring of the smooth functioning of Data Vendor interfaces

1. This service daily monitors the operating performance of the telecom circuits connecting Data Vendors to ATHEX-Net.

2. In addition, it provides Data Vendors' technical administrators with timely notification of any malfunctions in their ATHEX-Net interface circuits, so that the necessary steps can be taken to resolve them.

3. The relevant cost is **€50/month** per Data Vendor.

### 5.1.4 Technical administration of ATHEX-Net User node

#### 5.1.4.1 Technical administration of ATHEX-Net User node (in Greece)

This service relates to:

1. The technical administration of the telecom circuits connected to the central nodes of ATHEX-Net and includes:

- a) The day-to-day monitoring of the operating performance of the telecom circuits.
- b) Communication with circuit providers for the purpose of restoring the smooth operation of circuits in cases of malfunction.

2. The technical administration of ATHEX-Net User node equipment, which includes:

- a) The day-to-day monitoring of the smooth operation of the active equipment of the ATHEX-Net node.
- b) Communication with the member's technical managers for the purpose of restoring the smooth operation of nodes whenever necessary.

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<sup>122</sup> The title of paragraph 5.1.1 of article 5.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>123</sup> Subparagraph 5.1.2, paragraph 5.1, article 5 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>124</sup> Paragraph 5.1.1 of Article 5.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

c) The configuration of settings to serve the operating needs of Users' applications.

3. The relevant cost is **€50/month** per ATHEX-Net User node.

#### **5.1.4.2 Technical administration of ATHEX-Net User node (outside Greece)**

These services are the same as those described in paragraph 5, with the exception of 5.1.4.1 (1) (b) where the Member may communicate with providers/suppliers.

The relevant cost is **€150/month** per ATHEX-Net User node.<sup>125</sup>

#### **5.1.5 Access to the Test environment of the Automated Integrated Trading System (OASIS)**

This service enables ATHEX-Net users (ATHEX Members, ISVs, etc.) to access the Test environment of the OASIS (UAT) Trading system, so that they can familiarize themselves by performing tests in the operating environment of the Trading System. Such access is provided during regular business hours and days.

The relevant cost of access for the ISVs is **€50/month** and is provided free of charge to ATHEX Members.<sup>126</sup>

#### **5.1.6 Access of Data Vendors to the Test environment**

This service enables Data Vendors to access the data feed Test environment, so that they can familiarize themselves by performing tests in the respective operating environment. Such access is provided during regular business hours and days.

The relevant cost of access is **€50/month** per ATHEX-Net user.

#### **5.1.7 Application development support for users of ATHEX technology services**

This service provides technical support (e.g. via telephone, e-mail or the drafting of additional technical instructions) to ATHEX-Net Users (ATHEX Members, ISVs, etc.) for the development of applications for use in the Securities Market and the Derivatives Market.<sup>127</sup>

The relevant cost of access is **€250/month** per ATHEX-Net user.

#### **5.1.8 Proximity hosting services for ATHEX Members and ATHEXCSD Participants**

The main advantage for users of these services is the proximity they afford to OASIS central services, which means **ATHEX Members and ATHEXCSD Participants are able to communicate with the OASIS central systems of ATHEX at speeds of up to 1 Gbps.**

The service is provided to Market Participants (ATHEX and ATHEXCSD) and consists in the hosting of hardware or virtual equipment, applications, the provision of a space and support infrastructure (electricity, air-conditioning, etc.), and/or the technical management and support of applications, while it can also be provided in the form "Data Center as a Service (DCaaS)". The latter is a hosting service in which physical data center infrastructure and facilities are provided to clients, allowing them remote access to storage,

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<sup>125</sup> Subparagraph 5.1.4, paragraph 5.1, article 5 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>126</sup> Paragraph 5.1.5 of article 5.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>127</sup> Paragraph 5.1.7 of article 5.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

server and networking resources mainly through the Wide-Area-Network (WAN) of the Stock Exchange Network.

The above-mentioned services also include an agreed level of services provided in the form of a Service-Level Agreement (SLA).

#### **5.1.8.1 Monthly rental cost of Rack (42U)**

This particular service includes 1.5 kVA power consumption.

The relevant cost is **€3,000/month** per Rack.

#### **5.1.8.2 Monthly rental cost of ½ Rack (21U)**

This particular service includes 0.75 kVA power consumption.

The relevant cost is **€1,500/month** per Rack.

#### **5.1.8.3 Monthly cost for provision of additional power (1 kVA)**

The relevant cost is **€150/month**.

#### **5.1.8.4 Hosting of ATHEX Members' FIX Trading<sup>128</sup> systems**

This service enables the hosting (proximity) of ATHEX Member's FIX Trading systems as well as their relevant systems at the Data Center of ATHEX, for the main purpose of providing closer proximity to the central services of the OASIS trading system of ATHEX in order to achieve speeds of up to 1 Gbps.

It entails the following charges:

a) Fixed monthly connection charge, depending on the technical solution selected by the Member, with a choice of three (3) connectivity options:

i. Connection via Internet (IPsec Lan-to-Lan VPN tunnel over Internet). The fixed monthly connection charge for this solution is **€275**.

ii. Connection via the Member's existing circuits for connecting with ATHEXNet. The fixed monthly connection charge for this solution is **€200**.

iii. Connection via an independent leased line and active network equipment of the Member. The fixed monthly connection charge for this solution is **€100**.

b) Fixed monthly charge for the hosting of equipment (per U) which amounts to **€150/U**.

c) Labor cost for an ATHEX Engineer/Technician, outside the framework of the pre-agreed services (on business days, during working hours 09:00-17:00). The relevant cost is **€90/hour** of engagement of the ATHEX technician.

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<sup>128</sup> The title of paragraph 5.1.8.4 of article 5.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

d) Labor cost for an ATHEX Engineer/Technician, outside the framework of the pre-agreed services (outside business days/hours). The relevant cost is **€180/hour** of engagement of the ATHEX technician.<sup>129</sup>,<sup>130</sup>

### **5.1.9 Co-location hosting services for ATHEX Members, ATHEXCSD Participants or third companies**

The service consists in the hosting of hardware or virtual equipment, applications, the provision of a space and support infrastructure (electricity, air-conditioning, etc.), and/or the technical management and support of applications, while it can also be provided in the form “Data Center as a Service (DCaaS)”. The latter is a hosting service in which physical data center infrastructure and facilities are provided to clients, allowing them remote access to storage, server and networking resources mainly through a Wide-Area-Network (WAN).

The above-mentioned services also include an agreed level of services provided in the form of a Service-Level Agreement (SLA).

#### **5.1.9.1 Monthly rental cost of Rack (42U)**

This particular service includes 1.5 kVA power consumption.

The relevant cost per Rack is based on agreement regarding the services provided.

#### **5.1.9.2 Monthly rental cost of ½ Rack (21U)**

This particular service includes 0.75 kVA power consumption.

The relevant cost per Rack is based on agreement regarding the services provided.

#### **5.1.9.3 Monthly cost for provision of additional power (1 kVA)**

The relevant cost is **€150/month**.

#### **5.1.9.4 System hosting**

This service involves the hosting (co-location) of systems at the Data Center of ATHEX.

It entails the following charges:

- a) Fixed monthly connection charge, depending on the technical solution chosen.
- b) Fixed monthly charge for the hosting of equipment (per U) which amounts to **€50/U**.

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<sup>129</sup> Subparagraph 5.1.8, paragraph 5.1, article 5 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>130</sup> Paragraph 5.1.8.4 of article 5.1 was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

c) Labor cost for an ATHEX Engineer/Technician, outside the framework of the pre-agreed services (on business days, during working hours 09:00-17:00). The relevant cost is **€90/hour** of engagement of the ATHEX technician.

d) Labor cost for an ATHEX Engineer/Technician, outside the framework of the pre-agreed services (outside business days/hours). The relevant cost is **€180/hour** of engagement of the ATHEX technician.<sup>131</sup>

## Article 6. "HERMES" technology services

### 6.1 Charges for the use of "HERMES" services<sup>132</sup>

The fee for using the ERMIS Services is €60 per user per year, plus VAT. Payment is made when the user first logs in and on each annual anniversary of that date.

In addition, the charge per SMS message sent to the user with the "One Time Password" (OTP) login code is:

(i) €0.125, if the SMS message is sent to a mobile phone number belonging to a mobile phone network in Greece

(ii) €0.25 if the SMS message is sent to a mobile phone number belonging to a foreign network

The above charge is calculated on a monthly basis per issuer for all SMS messages sent to the issuer's users.

## PART 6. ENTRY INTO FORCE

This resolution shall have effect as of 1 December 2014.

This resolution shall be posted immediately on the website of ATHEX ([www.athexgroup.gr](http://www.athexgroup.gr)).

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<sup>131</sup> Subparagraph 5.1.9, paragraph 5.1, article 5 of Part 5 was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>132</sup> Paragraph 6.1 of article 6 was replaced as above by virtue of decision 100/14.4.2016 of the Stock Markets Steering Committee with effect as of 1.4.2016. and was replaced as above by virtue of decision 209/06.03.2025 of the Stock Markets Steering Committee with effect as of the date of implementation of the new version of the ERMIS system in a productive environment, which will be included in a relevant future announcement by ATHEXGROUP.



ANNEX

| A. ATHEX-Net Connectivity Services  |                                 |                  |  |   |
|---|---------------------------------|------------------|--|---|
| <p>The following types of ATHEX-Net nodes are supported (with the exception of instances IV, V, VI and VII and Disaster Recovery nodes):</p> <p><b>Type 1.a.1:</b> Configuration of one (1) Cisco ISR4331 router, one (1) Catalyst 2960 switch and one (1) Metro Ethernet telecom circuit.</p> <p><b>Type 1.a:</b> Configuration of one (1) Cisco ISR4331 router, one (1) Catalyst 2960 switch and two (2) Metro Ethernet telecom circuits, and</p> <p><b>Type 2.a:</b> Configuration of two (2) Cisco ISR4331 routers, two (2) Catalyst 2960 switches and two (2) Metro Ethernet telecom circuits.<sup>133</sup></p> |                                 | Cost Breakdown   |  |   |
|   |                                 | Payable to ATHEX | Payable to third parties                     |   |
|   |                                 |                  | 1 <sup>st</sup> Provider (Vodafone)          | 2 <sup>nd</sup> Provider (NOVA <sup>134</sup> ) |
| I. Connectivity services for ATHEX-Net users in the Athens area   |                                 |                  |  |   |
| 1. INSTALLATION OF A NEW ATHEX-NET USER NODE  |                                 |                  |  |   |
| One-time installation fee   | Depending on technical solution | €1,220           | Depending on technical solution (see note 3) | Depending on technical solution (see note 3)    |
| Fixed monthly fee <sup>135</sup>  | €880                            | €200             | €340   | €340  |
| 2. ATHEX-NET USER NODE TRANSFER   |                                 |                  |  |   |
| One-time fee for the transfer of an ATHEX-Net User Node to an address where providers have a point of presence  | Depending on technical solution | €1,220           | Depending on technical solution (see note 3) | Depending on technical solution (see note 3)    |
| One-time fee for the transfer of an ATHEX-Net User Node to an address where providers have no point of presence   | Depending on technical solution | €1,220           | Depending on technical solution (see note 3) | Depending on technical solution (see note 3)    |
| 3. CONVERSION OF ATHEX-NET USER NODE TYPE   |                                 |                  |  |   |
| One-time fee for conversion of an ATHEX-Net User Node from type 1.a to type 2.a   | €1,220                          | €1,220           | €0   | €0  |

<sup>133</sup> The first field of Table A was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>134</sup> The field of Table A was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>135</sup> The second field of sub-item 1, item I, Table A of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

| A. ATHEX-Net Connectivity Services  |                                 |        |  |  |
|---|---------------------------------|--------|--|--|
| One-time fee for conversion of an ATHEX-Net User Node from type 2.a to type 1.a | €1,220                          | €1,220 | €0   | €0   |
| 4. CREATION OF DISASTER RECOVERY NODE (TYPE 1.a, 1.a1, or 2.a)                  |                                 |        |  |  |
| 1 <sup>st</sup> connectivity option (2 telecom circuits)                        |                                 |        |  |  |
| One-time installation fee   | Depending on technical solution | €1,220 | Depending on technical solution (see note 3) | Depending on technical solution (see note 3) |
| Fixed monthly connection fee <sup>136</sup>                                     | €880                            | 200 €  | €340   | €340   |
| 2 <sup>nd</sup> connectivity option (1 telecom circuit Vodafone) <sup>137</sup> |                                 |        |  |  |
| One-time installation fee   | Depending on technical solution | €1,220 | Depending on technical solution (see note 3) | N/A  |
| Fixed monthly connection fee <sup>138</sup>                                     | €440                            | €100   | €340   | N/A  |
| 3 <sup>rd</sup> connectivity option (1 telecom circuit NOVA <sup>139</sup> )    |                                 |        |  |  |
| One-time installation fee   | Depending on technical solution | €1,220 | N/A  | Depending on technical solution (see note 3) |
| Fixed monthly connection fee <sup>140</sup>                                     | €440                            | €100   | N/A  | €340   |
|   |                                 |        |  |  |

<sup>136</sup> The third field of sub-item 4, item I, Table A of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>137</sup> The fourth field of sub-item 4, item I, Table A of the Annex was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>138</sup> The sixth field of sub-item 4, item I, Table A of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>139</sup> The field of Table A was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>140</sup> The ninth field of sub-item 4, item I, Table A of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

## A. ATHEX-Net Connectivity Services

5. In cases where ATHEX-Net Users from Greece or abroad wish to connect with the ATHEX FIX Trading service, in addition to the permitted ATHEX-Net user node-type configurations, it is also possible to connect over the Internet but solely with the use of an IPSec Lan-to-Lan VPN tunnel.<sup>141</sup>

|   |                    |   |   |   |
|---|--------------------|---|---|---|
| One-time installation fee   | Case-by-case basis | Case-by-case basis                      | N/A   | N/A   |
| Fixed monthly fee   | €275               |   |   |   |
| II. Connectivity services for ATHEX-Net users in the Thessaloniki area                                    |                    |   |   | 1 <sup>st</sup> Provider                                |
| 2. New Connections  |                    |   |   |   |
| <b>2.1</b> One-time installation fee (including Disaster Recovery node)                                   | Case-by-case basis | €2,000                                  | Depending on technical solution (see note 3)            | Depending on technical solution (see note 3)            |
| <b>2.2</b> Fixed monthly connection fee (including Disaster Recovery node)                                | Case-by-case basis | €100 per connection port with ATHEX-Net | Depending on technical solution                         | Depending on technical solution                         |
| <b>3.</b> One-time fee for transfer of ATHEX-Net User Node and conversion of node type                    | Case-by-case basis | €2,000                                  | Depending on technical solution in the case of transfer | Depending on technical solution in the case of transfer |
| III. Connectivity services for ATHEX-Net users in other areas of Greece (outside Athens and Thessaloniki) |                    |   |   |   |
| One-time installation fee (including Disaster Recovery node)  | Case-by-case basis | €2,000                                  | Depending on technical solution (see note 3)            | Depending on technical solution (see note 3)            |

<sup>141</sup> Sub-item 5, item I, Table A of the Annex was added as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

| A. ATHEX-Net Connectivity Services  |                                 |   |  |  |
|---|---------------------------------|---|--|--|
| Fixed monthly connection fee (including Disaster Recovery node)                                     | Case-by-case basis              | €100 per connection port with ATHEX-Net | Depending on technical solution              | Depending on technical solution              |
| IV. Connectivity services for ATHEX-Net users abroad (node-router type 1a, 1a.1, 2a) <sup>142</sup> |                                 |   |  |  |
| One-time installation fee   | Case-by-case basis              | €2,000                                  | Depending on technical solution (see note 3) | Depending on technical solution (see note 3) |
| Fixed monthly fee for new connections   | Case-by-case basis              | €100 per connection port with ATHEX-Net | Depending on technical solution              | Depending on technical solution              |
| VPN tunnel over Internet  |                                 |   |  |  |
| One-time installation fee   | Case-by-case basis              | Case-by-case basis                      | N/A  | N/A  |
| Fixed monthly fee   | €275                            |   |  |  |
| V. Connectivity Services for ISV Users in the Athens area (at least 1 telecom circuit 2 Mbps)       |                                 |   |  |  |
| 1 <sup>st</sup> connectivity option (2 telecom circuits)  |                                 |   |  |  |
| One-time installation fee   | Depending on technical solution | €1,220                                  | Depending on technical solution              | Depending on technical solution              |
| Fixed monthly connection fee <sup>143</sup>   | €880                            | €200                                    | €340   | €340   |
| 2 <sup>nd</sup> connectivity option (1 telecom circuit Vodafone) <sup>144</sup>                     |                                 |   |  |  |

<sup>142</sup> Item IV, Table A of the Annex was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>143</sup> The third field of item V, Table A of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>144</sup> The fourth field of item V, Table A of the Annex was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

| A. ATHEX-Net Connectivity Services   |                                 |   |                                 |                                 |
|--|---------------------------------|---|---------------------------------|---------------------------------|
| One-time installation fee  | Depending on technical solution | €1,220                                  | Depending on technical solution | N/A                             |
| Fixed monthly connection fee <sup>145</sup>  | €440                            | €100                                    | €340                            | N/A                             |
| 3 <sup>rd</sup> connectivity option (1 telecom circuit NOVA <sup>146</sup> )                 |                                 |   |                                 |                                 |
| One-time installation fee  | Depending on technical solution | €1,220                                  | N/A                             | Depending on technical solution |
| Fixed monthly connection fee <sup>147</sup>  | €440                            | €100                                    | N/A                             | €340                            |
| VI. Connectivity Services for ISV Users in other areas of Greece (outside Athens) and abroad |                                 |   |                                 |                                 |
| One-time installation fee for new connections  | Case-by-case basis              | €2,000                                  | Depending on technical solution | Depending on technical solution |
| Fixed monthly connection fee   | Case-by-case basis              | €100 per connection port with ATHEX-Net | Depending on technical solution | Depending on technical solution |
| VPN over Internet  |                                 |   |                                 |                                 |
| One-time installation fee <sup>148</sup>   | Case-by-case basis              | Case-by-case basis                      | N/A                             | N/A                             |
| Fixed monthly fee  | €275                            |   |                                 |                                 |
| VII. Connectivity/Hosting Services for Data Vendors <sup>149</sup>                           |                                 |   |                                 |                                 |
| 1 <sup>st</sup> connectivity option (via Internet)   |                                 |   |                                 |                                 |
| One-time installation fee  | €300                            | €300                                    |                                 |                                 |
| Fixed monthly connection fee   | €150                            | €150                                    | N/A                             | N/A                             |
|  |                                 |   |                                 |                                 |

<sup>145</sup> The sixth field of item V, Table A of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>146</sup> The field of Table A was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>147</sup> The ninth field of item V, Table A of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>148</sup> The fourth field of item VI, Table A of the Annex was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>149</sup> Item VII, Table A of the Annex was replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

| A. ATHEX-Net Connectivity Services                           |      |      |     |     |
|--|------|------|-----|-----|
|  |      |      |     |     |
|  |      |      |     |     |
|  |      |      |     |     |
| 2 <sup>nd</sup> connectivity option (via Ethernet interface) |      |      |     |     |
| One-time installation fee                                    | €500 | €500 |     |     |
| Fixed monthly connection fee (per Ethernet interface)        | €100 | €100 | N/A | N/A |
| Fixed monthly hosting fee per U                              | €150 | €150 | N/A | N/A |

**Notes:**

1. The cost of procuring ATHEX-Net User Node active equipment is borne entirely by the ATHEX-Net User in accordance with the instructions and technical specifications of ATHEX.
2. The fixed monthly connection fees payable to ATHEX by ATHEX Members and ATHEXCSD Participants are granted FREE OF CHARGE for the 1<sup>st</sup> ATHEX-Net User node.
3. The one-time cost of telecom circuits in the cases of a new node connection, transfer of a node and the creation of a Disaster Recovery node for an ATHEX-Net User will be agreed on a case-by-case basis between Users and ATHEX, depending on the technical work required on the part of the telecom providers Vodafone and NOVA<sup>150</sup>.
4. The fixed monthly fee for the connection of Users and ISVs to ATHEX-Net on the ATHEX side is €100 for each connection port with ATHEX-Net.
5. In the case of services for the connection of Data Vendors to ATHEX-Net, apart from the fixed monthly connection fee, monthly hosting fees are also charged depending on the space (measured in Rack Units "U") occupied on the Racks at the ATHEX Data Center.
6. In the case of Data Vendor connections, the relevant charges other than the cost of hosting services (which is determined by the "U" space occupied at the Group's Data Center) are covered by the annual fixed charge. All the above charges (including those relating to hosting services) will be set out in the respective contracts between the Data Vendors and ATHEX.
7. In cases where Users connect with ATHEX-Net from other areas of Greece (outside Athens) and from abroad, the one-time charge of €2,000 payable to ATHEX does not include any travel expenses that may be incurred by ATHEX technicians or the cost of their accommodation at the place of installation, etc.

<sup>150</sup> Instance 3 of Table A was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

Furthermore, the one-time cost of installing telecom connections and the fixed monthly fees will be determined once it has been determined which type of telecom connection will be required.

8. The network equipment (Cisco ISR4331 router, Catalyst 2960 switch, etc.) referred to in this Resolution may be changed in the event that the manufacturer announces new equipment in replacement of the aforesaid models on account of End of Life or End of Support. In such a case, ATHEX will announce to Members the new equipment to be procured.<sup>151</sup>

| <b>B. Software Installation &amp; License Services<sup>152</sup></b> |   |                             |
|--|---|-----------------------------|
| Trading System & Clearing System                                     |   |                             |
|  | Service   | Cost                        |
| 1  | Installation cost for Production/Test & ATHEX FIX Trading | €250/Session <sup>153</sup> |
|  |   | 154                         |

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<sup>151</sup> The notes to Table A were replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>152</sup> The terms 'DSS – API' and 'DSS & Clearing System' of Table B of the Annex were deleted as above by virtue of decision 178/28.01.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 12.04.2021 and the table was subsequently replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>153</sup> The field of Table B was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>154</sup> The field of Table B was removed as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>155</sup> The field "Notes" of Table B was removed as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

| C. Other Services Provided <sup>156</sup> |   |              |
|---|---|--------------|
| Service                                   |   | Cost         |
| 1   | Preventive maintenance and monitoring of the smooth functioning of <sup>157</sup> the ATHEX FIX Trading service                                       | €100 / month |
| 2   | ATHEX FIX Trading <sup>158</sup> Server Hosting   | €200 / month |
| 3   | <sup>159</sup>  | €100 / month |
| 4   | Preventive maintenance and monitoring of the smooth functioning of Data Vendor connections  | €50 / month  |
| 5   | Technical administration of ATHEX-Net User Node (in Greece)   | €50 / month  |
| 6   | Technical administration of ATHEX-Net User Node (outside Greece)  | €150 / month |
| 7   | Access to the Test environment of the Trading system  | €50 / month  |
| 8   | Access of Data Vendors to the Test environment  | €50 / month  |
| 9   | Application development support with the use <sup>160</sup> of the ATHEX FIX Trading service  | €250 / month |
| 10  | Application development support for use of the ATHEX Data Feed  | €100 / month |
| 11  | Fixed monthly fee for connection to the ATHEX FIX Trading service (for connection via Internet) with implementation of an IPSec Lan-to-Lan VPN tunnel | €275         |
| 12  | Hosting services (proximity, co-location) for ATHEX Members and ATHEXCSD Participants   |              |
| 12.1                                      | Monthly rental cost for one (1) Rack (42 U)   | €3,000       |

<sup>156</sup> The terms 'DSS – API' and 'DSS & Clearing System' of Table C of the Annex were deleted as above by virtue of decision 178/28.01.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 12.04.2021 and the table was subsequently replaced as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.

<sup>157</sup> Point 1 of Table C of the Annex was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>158</sup> Point 2 of Table C of the Annex was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>159</sup> Point 3 of Table C of the Annex was deleted as above by virtue of decision 178/28.01.2021 of the Stock Markets Steering Committee of ATHEX with effect as of 12.04.2021.

<sup>160</sup> Point 9 of Table C of the Annex was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

| C. Other Services Provided <sup>156</sup> |  |                     |
|---|--|---------------------|
| Service                                   |  | Cost                |
|   | [includes 1.5 kVA power consumption]   |                     |
| 12.2                                      | Monthly rental cost for ½ Rack (21 U)<br>[includes 0.75 kVA power consumption]   | €1,500              |
| 12.3                                      | Monthly cost for providing additional power (1 kVA)  | €150                |
| 12.4                                      | ATHEX FIX Trading hosting for Members <sup>161</sup>   |                     |
| 12.4.1                                    | Fixed monthly connection fee<br>(for connection via Internet)  | €275                |
| 12.4.2                                    | Fixed monthly connection fee<br>(for connection via Member's existing ATHEX-Net circuits)  | €200                |
| 12.4.3                                    | Fixed monthly connection fee<br>(for connection via an independent leased line and equipment of the Member)  | €100                |
| 12.4.4                                    | Fixed monthly hosting fee with proximity services, per 1 U   | €150                |
| 12.4.5                                    | Fixed monthly hosting fee without proximity services, per 1 U  | €50                 |
| 13  | Labor cost for an ATHEX Engineer/Technician, outside the framework of the pre-agreed services (on business days, during working hours 09:00-17:00) | €90 / hour engaged  |
| 14  | Labor cost for an ATHEX Engineer/Technician, outside the framework of the pre-agreed services (outside business days/hours)                        | €180 / hour engaged |
| 15  | Cost of changing settings from Disaster Recovery to Production environment and vice-versa  | €100 / change       |

**Notes:**

1. The technical administration of an ATHEX-Net User Node is provided FREE OF CHARGE to ATHEX Members and ATHEXCSD Participants for the 1<sup>st</sup> node as well as for existing nodes (up to entry into force hereof) at Members' branch offices in Thessaloniki.

<sup>161</sup> Point 12.4 of Table C of the Annex was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

2. The service "Application development support for users of ATHEX technology services" is provided in combination with the service "Access to the Test environment of the OASIS Automated Integrated Trading System".<sup>162, 163</sup>
3. The service "Provision of additional power" is provided to Members in combination with the Rack space rental services.
4. The service "ATHEX FIX Trading hosting"<sup>164</sup> includes a fixed monthly connection fee (depending on the technical solution chosen by the Member) and a fixed monthly fee for hosting equipment.
5. The cost of changing the settings of a Disaster Recovery-type node to the production environment and vice-versa is charged per change.
6. In cases where there is a need for Members' requests to be satisfied on the same business day that they are submitted, the respective charges will be increased by 50%.

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<sup>162</sup> Note 2 of Table C of the Annex was replaced as above by virtue of decision 194/19.07.2023 of the Stock Market's Steering Committee of ATHEX and with effect as of 24.07.2023.

<sup>163</sup> Note 2 of Table C of the Annex was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2025.

<sup>164</sup> Note 4 of Table C of the Annex was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

**D. Technical Services for Order Routing<sup>165</sup>**

|                | Technical Service | Applicable Markets | Type of User to which service is offered | Environment | Access Method | Primary Active G/Ws | Backup G/Ws | Pricing based on ATHEX institutional framework | Reference paragraph |
|----------------|-------------------|--------------------|--|-------------|---------------|---------------------|-------------|--|---------------------|
| 1              | ORAMA             | ATHEX              | Member                                   | Production  | ORAMA         | N/A                 | N/A         | FREE <sup>166</sup>                            | A. 1.2<br>B. 1.1    |
| <sup>167</sup> |                   |                    |  |             |               |                     |             |  | A. 1.2<br>B. 1.1    |
|                |                   |                    |  |             |               |                     |             |  |                     |
|                |                   |                    |  |             |               |                     |             |  |                     |
|                |                   |                    |  |             |               |                     |             |  |                     |
|                |                   |                    |  |             |               |                     |             |  |                     |
|                |                   |                    |  |             |               |                     |             |  |                     |
|                |                   |                    |  |             |               |                     |             |  |                     |
|                |                   |                    |  |             |               |                     |             |  |                     |
|                |                   |                    |  |             |               |                     |             |  |                     |

<sup>165</sup> Table D of the Annex was replaced as above with the deletion of the references to Xnet by virtue of decision 194/19.07.2023 Stock Markets Steering Committee of ATHEX with effect as of 24.07.2023

<sup>166</sup> Case 1 of Table D of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020

<sup>167</sup> Cases from 2 to 10 of Table D were removed as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 24.12.2024.

| D. Technical Services for Order Routing <sup>165</sup> |                                       |                    |  |             |                               |                     |             |  |                                   |
|--|---------------------------------------|--------------------|--|-------------|-------------------------------|---------------------|-------------|--|-----------------------------------|
|  | Technical Service                     | Applicable Markets | Type of User to which service is offered | Environment | Access Method                 | Primary Active G/Ws | Backup G/Ws | Pricing based on ATHEX institutional framework | Reference paragraph               |
| 11 <sup>168</sup> ,<br>169                             | ATHEX Trader                          | ATHEX              | Member                                   | Production  | ATHEX Trader                  | N/A                 | N/A         | €1,200/user/year                               |                                   |
| 13   | ORAMA                                 | ATHEX              | MEMBER                                   | Test        | ORAMA                         | N/A                 | N/A         | FREE <sup>170</sup>                            | E.5.1.6 <sup>171</sup>            |
| 172 <sup>3</sup><br>0                                  | SA via ORAMA terminal                 | ATHEX              | Member                                   | Production  | ORAMA                         | N/A                 | N/A         | FREE   | A. 1.2                            |
| 31   | SA via ORAMA terminal                 | ATHEX              | Member                                   | Test        | ORAMA                         | N/A                 | N/A         | FREE   | A. 1.2<br>E.5.1.6 <sup>173</sup>  |
| 32   | SA via connection with other provider | ATHEX              | Member                                   | Production  | Provider's client application | N/A                 | N/A         | €2,000/year per client (plus Provider fees)    | A. 1.2                            |
| 33   | SA via connection                     | ATHEX              | Member                                   | Test        | Provider's                    | N/A                 | N/A         | FREE   | A. 1.2<br>E. 5.1.6 <sup>174</sup> |

<sup>168</sup> A new item 11 was added with consequential renumbering of the subsequent items of Table D of the Annex, as above, by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 16.03.2020.

<sup>169</sup> Case 11 of Table D was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>170</sup> Case 13 of Table D was amended as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 29.11.2024.

<sup>171</sup> The last field of the new item 13 of Table D of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>172</sup> Cases from 14 to 28 of Table D were removed as above by virtue of decision 208/29.11.2024 of the Stock Markets Steering Committee of ATHEX with effect as of 24.12.2024.

<sup>173</sup> The last field of the new item 31 of Table D of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

<sup>174</sup> The last field of the new item 33 of Table D of the Annex was replaced as above by virtue of decision 173/06.03.2020 of the Stock Markets Steering Committee of ATHEX with effect as of 01.01.2020.

#### D. Technical Services for Order Routing<sup>165</sup>

|    | Technical Service         | Applicable Markets | Type of User to which service is offered | Environment | Access Method      | Primary Active G/Ws | Backup G/Ws | Pricing based on ATHEX institutional framework               | Reference paragraph |
|----|---------------------------|--------------------|--|-------------|--------------------|---------------------|-------------|--|---------------------|
|    | ction with other provider |                    |  |             | client application |                     |             |  |                     |
| 34 | ATHEX FIX TRADING         | ATHEX              | Member                                   | Production  | FIX                | -                   | -           | Drop copy:<br>€1,200/year<br>Trading session:<br>€2,400/year | A. 1.2<br>B. 1.1    |
| 35 | ATHEX FIX TRADING         | ATHEX              | Member                                   | Test        | Fix                | -                   | -           | FREE <sup>175</sup>  |                     |

<sup>175</sup> Instances 34 and 35 were added as above by virtue of decision 190/31.1.2023 of the Stock Markets Steering Committee with effect as of the date of activation of the ATHEX FIX Trading service in the production Trading System.