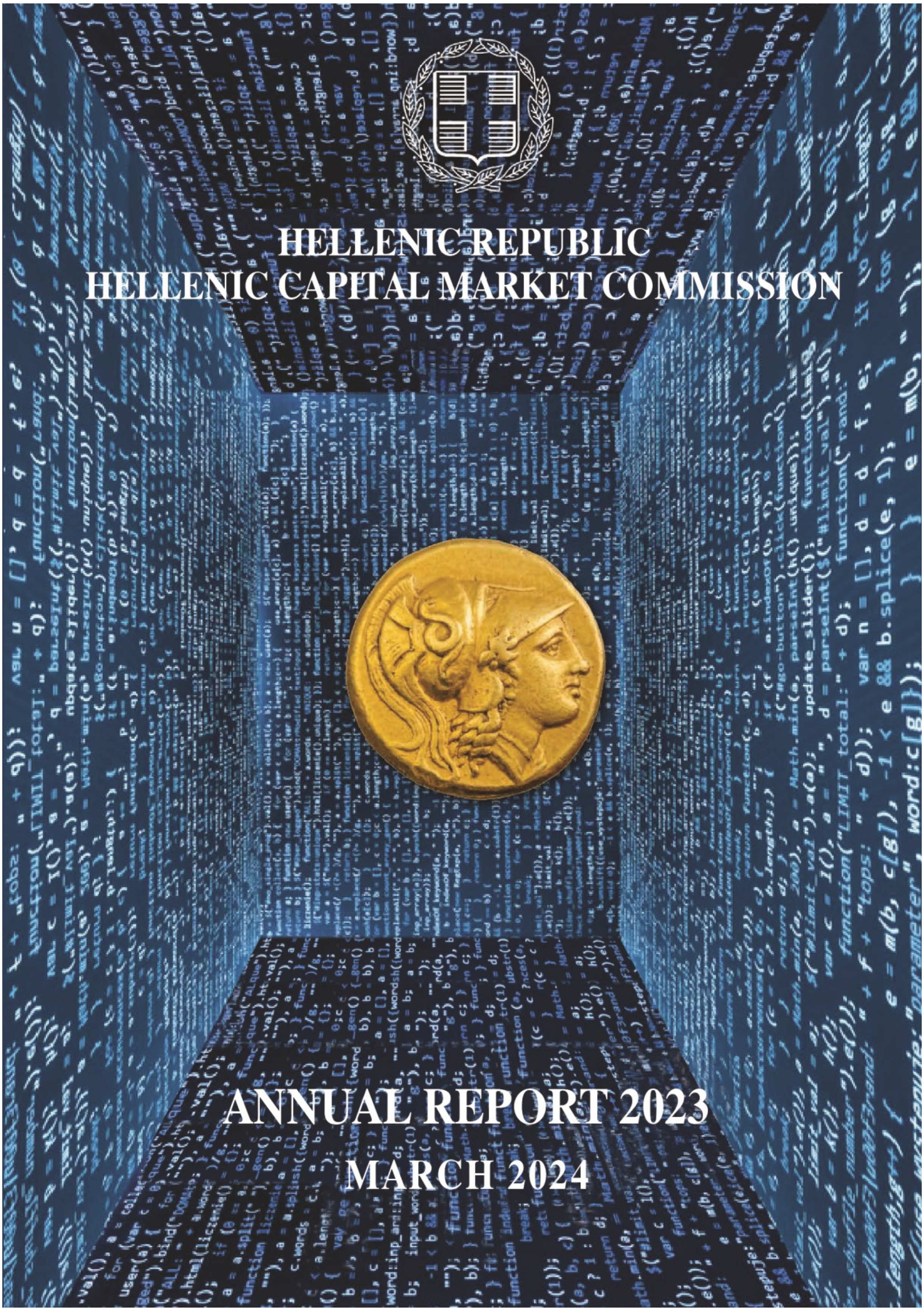

HELLENIC REPUBLIC
HELLENIC CAPITAL MARKET COMMISSION
ANNUAL REPORT 2023
MARCH 2024

CONTENTS

TABLES

FIGURES

A NOTE FROM THE CHAIR

2023 was a year of high inflation and high interest rates for an overly extended period, large fluctuations in international commodity prices, financial turbulence in the US during the first half of 2023, the continuing Russia-Ukraine war and the war in the Middle East, two events that intensified geopolitical risk. Despite the adverse circumstances in global economy, and given the slowdown in EU economies, the Greek economy managed to keep an upward trajectory, performing rather remarkably, as demonstrated by its growth rate.

The Greek capital market, given the positive economic climate in Greece in 2023, showed great resilience and helped drastically to finance growth and support entrepreneurship.

It is characteristic that in 2023, the Hellenic Capital Market Commission approved 11 Prospectuses and 1 Supplementary Prospectus, for raising total funds of approximately €2.7 million through the Athens Exchange, more-than-double the 2022 amount.

Among other things, the Hellenic Capital Market Commission contributed, exercising relevant supervisory powers concerning the divestiture *of the Hellenic Financial Stability Fund from the systemic banks (Eurobank, Alpha Bank, and National Bank), which took place in 2023. More specifically, this was achieved with the approval of the Prospectus for the offer by the HFSF of shares of the National Bank, amounting to approximately €1 billion, as well as relevant approvalsconcerning the transactions for the transfer of Eurobank and Alpha Bank shares, with Alpha Bank entering into a strategic cooperation with a major foreign financial institution. The aforementioned actions, as well as two common bond loans totaling €600 million, attracted considerable interest from stakeholders in the Greek market.*

Moreover, one of the Prospectuses approved was the Prospectus concerning the listing of shares of OPTIMA BANK SA on the Athens Exchange, the first initial public offering of a bank on the ATHEXafter 17 years. It is worth noting that in 2023, there were signifincant net inflows in mutual funds (M/Fs), amounting at €3,183.72 million as compared to €610.76 million in 2022, and the total net assets of M/Fs increased by 45.13%, to €15.80 billion at the end of 2023 from €10.88 billion in 2022. In addition, the participation of foreign investors to the market capitalisation of the Athens Exchange was slightly increased year-on-year (to 64.37% in 2023 from 63.61% in 2022), while the participation of retail domestic investors stood at 13,382.52 million euros or 16.57% of total market capitalization in the Athens Exchange, as compared to 10,491.07 million euros or 17.54% in 2022.

In 2023, reforms continued, along with the preparation of the Greek capital market, in order to respond to the new demanding environment. Among other things, listed companies achieved a very good level of knowledge of the new corporate governance regime, and they were dully supervised for implementing this framework. In accordance with the requirements of Law 4706/2020, the Hellenic Capital Market

Commission issued a report on the progress concerning the implementation of the corporate governance framework and conducted an assessment of the legislative framework, which is expected to be published in early 2024.

Moreover, the HCMC took a number of steps with the aim of informing stakeholders about their obligations with regard to corporate governance, and with regard to the new legislation on sustainable financing and the incorporation of ESG criteria into capital market regulation.

In 2023, the Hellenic Capital Market Commission took action in order to achieve its digital transformation and a public procurement tendering process was started in this respect. Such transformation includesnew online services through the website of the HCMC to companies, public entities, and citizens for issues related to its responsibilities, mainly focusing on enhancing investor protection.

An important landmark in 2023, which was one of the objectives of the Board of Directors of the HCMC since they entered office, was the closing of long-running cases, pending for more than five years. In December 2023, the Board of Directors of the Hellenic Capital Market Commission completed the examination of all remaining cases and thus there are no more cases pending for more than five years, for the first time in many years. The closing of these pending cases was the result of consistent assesments carried out in the last four years. This achievement will enable the HCMC to allocate its audit resources to continue its supervisory work, without the extra burden of a large number of older cases. This project had a high degree of difficulty and complexity, and it was succesfull thanks to the systematic and intensive, collective but also individual efforts of the personnel of the Hellenic Capital Market Commission.

In 2023 the Hellenic Capital Market Commission was very active at a European as well as at an international level being a member of the Management Board of the European Securities and Markets Authority (ESMA) and of the Board of the International Organization of Securities Commissions (IOSCO), and also actively involved, by its experts being members of standing committees/groups of the European Securities and Markets Authority (ESMA), and of the Joint Committees of the three European Supervisory Authorities (ESMA, EBA, EIOPA).

The institutional development, the digital modernisation and the continuous enhancement of the Greek capital market framework in 2023 took place in parallel with the exercice of the supervisory powers of the HCMC, which is set out below.

Macroeconomic developments

In 2023, the growth rate of the global economy fell to 3% from 3.5 % in 2022, as the war in Ukraine, geoeconomic fragmentation, and the resurgence of uncertainty because of developments in the Middle East had an adverse effect on economic activity and expectations. Growth rates were weakened in developed economies, especially in the eurozone, while they were marginally reduced in developing and *emerging economies. In the European Union (EU) the economic environment was marked by restrictive monetary policy, the gradual withdrawal of fiscal support, high debt, and high, albeit decreasing inflation. The growth rate of the eurozone's GDP fell dramatically to 0.4% from 3.5% in 2022. That said, in 2023 growth was uneven among member-countries. Global inflation remained high, despite being reduced in 2023. In the countries of the eurozone the Harmonized Index of Consumer Prices (HICP) fell to 5.4% in 2023 from 8.4% in 2022. As regards employment, labour market performance in the eurozone was satisfactory during 2023. Total employment estimated to have increased by 1.4% in 2023, as compared to 2.3% in 2022. Unemployment as a percentage of the labour force continued to fall, reaching an historic low of 6.5% in December 2023, as compared to 6.7% in December 2022.*

In 2023, the measures for dealing with the energy crisis continued to affect fiscal results, albeit to a lesser extent than in 2022. According to European Commission estimates, the net cost of the measures for dealing with the energy crisis fell to 0.9% of EU GDP in 2023, from 1.2% in 2022. In the third quarter of 2023, the seasonally adjusted general government debt to GDP ratio stood at 2.8% in both the EU and the eurozone, being reduced as compared to the third quarter of 2022 (-4% and -4.1% respectively). Public debt in the EU was further reduced, despite the fact the strong revenue growth of 2022 started to wear out, while pressure on the expenditure side persisted. At the end of the third quarter of 2023, gross general government debt in the EU fell to 82.6% of GDP from 84.6% in the same quarter of 2022.

Despite the decrease of the inflation rate, central banks continued to pursue a policy of raising their base rates, in order to help bring inflation back to the long-term target of 2%. The US Federal Reserve raised its rates 4 times from February to July, by 25 basis points. In turn, the European Central Bank (ECB) also raised its base rates in June, July and September by 25 basis points each time.

The Greek economy continued to grow at a satisfactory rate (2%) in 2023, higher than the corresponding growth rate of the eurozone, proving its resilience in an adverse and uncertain international environment. The largest contribution to economic growth in 2023 was that of gross fixed capital formation, which increased by 4% in real terms year-on-year. Investment growth is to a great extent due to increased investment in housing. A key component of the Greek economy's growth in 2023 was, as in 2022, the increase in private consumption (1.8%) and in the exports of goods and services (3.7%), which received a considerable boost by the recovery of tourism. In contrast, the increase in the imports of goods and services by 2.1% in 2023, which is due to the growth of private consumption and investment, had a negative effect on GDP growth. The growth rate of the Harmonized Index of Consumer Prices (HICP) was substantially reduced in 2023, falling to 4.1% from 9.3% in 2022. This de-escalation is mainly due to the reduction of energy prices.

In 2023, labour market conditions improved, as the unemployment rate was further reduced to 10.4% in December, from 11.8% in the same month of 2022, while total employment rose by 1%. Employment growth occurred alongside the increase in the minimum salary from 663 euros in January 2022 and 713 euros in May 2022 to 780 euros in April 2023. It should be noted that, according to seasonally adjusted *data from the quarterly national accounts of ELSTAT, in the third quarter of 2023 the total remuneration of employees increased by 3.8% year-on-year.*

*As regards developments in the external sector of the economy in 2023, the current account deficit was reduced by 7.1 billion euros year-on-year to 14.1 billion euros. The balance of goods deficit was also reduced, as the decrease in imports exceeded that of exports. The balance of services surplus was widened, primarily because of the improvement of the travel balance and secondarily because of the improvement of the other services balance, which was partly offset by the worsening of the transport balance. The arrivals of non-resident travelers increased by 17.6% year-on-year, and the relevant receipts were up by 15.7%. In 2023**,** the capital account surplus **decreased** year-on-year and stood at 2.7 billion euros, as all the other sectors of the economy, excluding the general government, registered net payments instead of net receipts. Finally, the overall capital account deficit was reduced in 2023 as compared to 2022 (by 7.2 billion euros) and stood at 9 billion euros.*

According to Ministry of Finance estimates, the General Government deficit as a percentage of GDP was reduced to 2.2% in 2023 from 2.4% in 2022. It is estimated that the primary balance remained in surplus in 2023, and stood at 1.1% of GDP, as compared to a 0.1% surplus in 2022 and deficit equivalent to 4.5% of GDP in 2021. The year-on-year increase of the primary surplus in 2023 is due to the growth of tax revenues and social security contributions as a result of burgeoning economic activity, as well as the increase in electronic transactions and tax audits, which improved collectibility.

The General Government debt is estimated to have marginally increased in absolute terms in 2023, albeit was substantially reduced as a percentage of GDP, to 160.3% from 172.6% in 2022.. This development is due to GDP growth. In absolute terms, the public debt rose to 357 billion euros in 2023 (according to the public debt bulletin as per December 2023) from 356.6 billion euros in 2022.

The steady improvement of fiscal aggregates and the commitment to the implementation of a reform programme led in 2023 to the upgrading of the Greek government's credit rating and the restoration of its investment grade. This momentous development occurred amidst international uncertainty because of geopolitical developments and increasing financial risks, and constitutes a landmark for the Greek economy. More specifically, the Scope Ratings agency in August, DBRS in early September, S&P in October, and Fitch ratings agency in early December 2023 upgraded the Greek government's credit rating to investment grade. As a result, Greek government bond yields, as well as their spreads from other eurozone government bonds, were significantly reduced during 2023. More specifically, the spread between the Greek 10-year bond and the German reference 10-year bond fell from 203 basis points in January to 119 basis points in December 2023.

The upgrade of the Greek government's credit rating to investment grade has a positive effect on the prospects of Greek banks as well, since it automatically improves the quality of their portfolios and is expected to lead to further upgrades of their credit ratings, which will result to the containment of their borrowing costs and the increase of their available liquidity. In the long term, the upgrade of the credit *rating of both the Greek government and the Greek banks will have a significant positive effect on economic activity.*

Financial conditions

In 2023, international capital markets –especially in the EU– remained exceptionally resilient, despite the confluence of risks throughout the year, risks that remained at high or very high levels and caused a slowdown in the economic, as well as market environment. In the first half of 2023, financial markets recovered, due to lower energy prices and to the expectations of a slower pace of monetary tightening. However, the collapse of many regional banks in the US rekindled concerns about the banking sector and caused a brief episode of instability. Markets remained very sensitive, particularly to possible deteriorations of economic fundamentals or financial institution risks, while closely monitoring the sustainability of public and private debt in the context of an environment of persistently high interest rates for an extended period of time, macroeconomic prospects, and increased geopolitical and regional risks. There is a high risk of corrections –in a context of fragile market liquidity– in the equity, bond, and crypto markets, with particular concern focused on exposure, mainly to commercial property. Instability and inflation also increase short-term risks for consumers, especially in relation to losses from negative real returns.

The macro-financial environment deteriorated, amidst the persistence of strict financing conditions. At the global level, the IMF confirmed the negative outlook of the macroeconomic environment, with an estimated/expected slowdown of real global GDP growth from 3% in 2023 to 2.9% in 2024. Moreover, the European Commission revised down its estimates regarding growth in the EU for both 2023 (0.5%) and 2024 (0.9%).

Refinancing costs spiked and are expected to impose a high burden on companies with debt maturing in 2024 and 2025. It is telling that the first downgrades by credit rating agencies have already occurred. The deterioration of credit quality is expected to have an impact on investor portfolio returns. As uncertainty and fragile liquidity are reducing the resilience of the financial system, external shocks are also expected to lead to increased price volatility.

Financial stability risks remained high amidst this climate of intense geopolitical instability, continued concerns about the climate threat, revision of inflationary expectations and persistently high interest rates, as central banks continued to purse strict monetary policies, which, in turn give rise to increased recessionary risks. In this environment, financial conditions deteriorated, along with increased market volatility and marked uncertainty as regards liquidity levels. That said, investor interest for sustainable financing (ESG) products remained strong, while concerns about developments in the cryptocurrency universe were intensified. Finally, energy prices remain volatile and, therefore, unpredictable, because of continuing geopolitical tensions.

Since the beginning of 2023 and throughout the entire year, central banks –such as the European Central Bank (ECB), the US Federal Reserve, and the Bank of England– showed their clear intention to continue *pursuing strict monetary policies, as well as to contain the rise of interest rates in October 2023. In this environment, the ECB stopped increasing its rates in October 2023. The ECB estimates that its Asset Purchase Programme (APP) will keep on being reduced, while the Pandemic Emergency Purchase Programme will keep on being reinvested in 2024. International financial conditions reflect the tight monetary conditions of the past two years, with higher average lending rates and restrictive credit standards implemented on both business loans and mortgage loans in Europe. All reports by international and European organisations identify the impact of interest rate increases, which feeds back in equity and bond markets and leads to the readjustment (repricing) of debt servicing costs, as the main risk driver in the current capital market environment.*

The low levels of volatility observed imply that these developments were rather expected. Although banks benefited from the higher interest rates through their increased net interest income, as well through increased market valuations, many questions arise concerning the sustainability of their profits, as a result of reduced lending volumes and concerns about the sensitivity of banking asset quality to increased interest rates. Increased interest rates and concerns about corporate profitability led to a reduction of corporate bond spreads, even in the case of high-yield companies, implying an underestimation of risks.

In general, sovereign debt levels in EU member states are decreasing. However, the persistence of high interest rates, the weak growth prospects in the EU, and the differing fiscal positions of the member states continue to cause concern about the sustainability of the debt. In general, European sovereign bond yields fell in the second half of 2023, a development related to the prospects of interest rates remaining high for a prolonged period and to the uncertainty about the future decisions of central banks.

Equity valuations were moderately increased in the second half of 2023, driven by a price rally at the end of the year, related to expectations for interest rate cuts in 2024. Volatility remained at moderate levels, while bid-ask spreads were relatively increased, highlighting the restlessness prevailing in the market.

Similarly. market-based finance was weak in stock markets, which featured high uncertainty and volatility levels. Generally, stock issuing activity in Europe was slightly increased at the end of the 2nd half of 2023, albeit remaining weak over the largest part of the year. The total amount of stock issues in the primary market in Europe during the second half of 2023, stood at 38 billion euros, increased by 10% year-on-year. As regards bilateral exchange rates, at the end of 2023 and on a year-on-year basis, the euro lost -1.97% and -5.90% of its value against the sterling and the Swiss franc respectively, whereas it gained 3.64% and 11.79% against the US dollar and the Japanese yen respectively.

Supervision of the Greek Capital Market

The course of the Greek capital market in 2023 was characterised by a) an increase of the total market capitalisation of ATHEX-listed shares, as compared to the previous year, and the positive returns of most indices of the Athens Exchange; b) a mixed picture as regards trading activity in the Securities Market (significantly increased trading activity in shares, reduced activity in bonds), with increased trading *activity in the Derivatives Market and increased activity in the Alternative Market; c) the reduction in long-term Greek government bond yields (interest rates) and the increase in the value of trading in Greek Government bonds; and, finally, d) the net inflows to, and the significant increase in the total net assets of, mutual funds mentioned above.*

In the market for Greek Government bonds, the rise of yields during the past two years was finally discontinued. More specifically, the (average) yield of the ten-year benchmark bond stood at 3.28% in the end of 2023, as compared to 4.22% in December 2022. Based on statistics from the System for Monitoring Transactions in Book-entry Securities of the Bank of Greece, the nominal value of secondary market trading on Greek Government bonds stood at 3,589.97 billion euros, an amount that is 36.80% higher than the corresponding amount for the previous year (2,624.33 billion euros). The average monthly nominal value of trading stood at 299.16 billion euros (218.69 billion euros in 2022). The value of transactions in the Electronic Secondary Government Bonds Market (HDAT) stood at 26.45 billion euros on an annual basis (20.93 billion euros in 2022).

According to ATHEX data, the total market capitalisation of shares listed on the Securities Market stood at 87,514.31 million euros (also taking into account the shares in suspension of trading), significantly increased by 32.88% year-on-year (65,861.95 million euros in 2022). The ratio of total market capitalisation to Greece's GDP was increased year-on-year (to 39.29% from 31.66% in 2022). The market capitalisation of shares listed for trading in the Alternative Market of the ATHEX stood at 450.37 million euros (280.05 million euros at the end of 2022). Trading activity in the Securities Market of the Athens Exchange was significantly increased. More specifically, the value of equity trading stood at 28,696.66 million euros, increased by 59.97% year-on-year, while the value of trading in bonds stood at 219.80 million euros, reduced by -9.81% year-on-year. The average monthly value of equity trading stood at 2.39 billion euros, while the average monthly value of trading in bonds stood at 18.32 million euros. Finally, the value of equity trading in the Alternative Market of the ATHEX continued to increase, and stood at 134.08 million euros (100.95 million euros in 2022), while the value of trading in corporate bonds stood at 1.94 euros (919,209 thousand euros in 2022).

International activities

It is noted that in 2023 the Hellenic Capital Market Commission continued to be actively involved in the work of all committees/groups of the European Securities and Markets Authority (ESMA), and of the the Joint Committee of the three European Supervisory Authorities (ESMA, EBA, EIOPA), contributing to the formation of a common European supervision framework, and including the particularities of the Greek market in the relevant dialogue. Moreover, the Hellenic Capital Market Commission continues to be a member of the Management Board of ESMA, following my reelection for an additional term, until December 2025.

The main role of the Management Board of ESMA is to ensure that ESMA carries out its mission in accordance with the ESMA Regulation and oversees issues pertaining to the Authority's management *and governance. The membership of the Hellenic Capital Market Commission is a recognition of its contribution to the work of this European agency, within a framework of major developments in European and global capital markets.*

In addition, the Hellenic Capital Market Commission was elected as a member of the Board of the International Organization of Securities Commissions (IOSCO) for a period of two years, starting in October 2022. IOSCO is the main forum of international cooperation among capital market regulators, is recognised as the international body responsible for the establishment of standards for the financial markets, and has 238 members from more than 100 countries. Recently, I was elected Chair of the Diversity Network, which aims at ***promoting a culture of respect for diversity within regulatory authorities****. Also, following a decision from the Board of IOSCO in 2023, the organization of the Annual Meeting of IOSCO in 2024 was entrusted for the first time to the Hellenic Capital Market Commission.*

The Hellenic Capital Market Commission is also a member of the Bureau of the OECD Corporate Governance Committee since 1.1.2023. It is noted that in 2023 the OECD Corporate Governance Committee completed the revision of the corporate governance principles, leading to the issuance of the G20/OECD Principles of Corporate Governance, with the active involvement and contribution of the HCMC as well. I was reelected at the Bureau of the Corporate Governance Committee of the Organisation for Economic Co operation and Development (OECD) for an additional term, 2024.

In 2023 the HCMC strengthened its presence in international organisations and this means that the HCMC's work is recognised both in Europe and globally.

Internal Organisation of the Hellenic Capital Market Commission and Digital Transformation

In 2023, as mentioned above, we continued the efforts for the improvement of the internal organisation of the Hellenic Capital Market Commission. More specifically:

- *We completed the project "Development and Implementation of a Plan for the Improvement of the Orgnisational Sgtructure of the Hellenic Capital Market Commission" which was financed by the National Strategic Reference Framework (NSRF)*
- *We further updated the Organisational Structure of the HCMC, including the new powers provided for by European and national law, allocating them internally among the Directorates.*
- *We also updated the draft Internal Regulation of the HCMC, in order to take into account best practices, including a new procedure concerning complaints. The updated draft was approved by the Board of Directors of the HCMC, and has to be approved by the Ministry of Finance.*
- *We issued the Annual Operational Plan with detailed targets and actions for 2023, implementing the 5-year Strategic Plan, which is the long-term strategy of the HCMC with core priorities of the Hellenic Capital Market Commission, as well as Union priorities by the European Securities and Markets Authority (ESMA).*

- *We launched the tender for the Digital Transformation of the Hellenic Capital Market Commission; the project is called "Upgrading of the Information Technology Systems and the Security Systems of the Hellenic Capital Market Commission", is financed by the Recovery Fund and is expected to be completed by the end of 2025. This project includes three sub-projects: a) upgrading of the cybersecurity system; b) integration of all HCMC systems to improve data management; and c) modernisation of the mechanism for monitoring the market in real time, using modern tools for investigating cases of market abuse.*

- *In collaboration with an international auditing firm, we developed, for the first time, a Costing Model for the calculation of the financial resources of the Hellenic Capital Market Commission; on the basis of this model, the HCMC submitted to the Ministry of Finance its proposal concerning the fees and charges payable to the HCMC so that the Ministry issues a relevant ministerial decision.*

- *In cooperation with ESMA, we are developingtools that will enable the HCMC to investigate greenwashing practices using Artificial Intelligence (this project is financed by the Technical Support Instrument [TSI]).*

- *The HCMC will participate in the TSI 2023 project concerning ESG Risk Management in the financial sector (regulatory mapping, data sources and data analysis, methodology-tools-supervisory guidance, skills development, and methodologies and tools in order to respond to greenwashing).*

- *We completed the development of an application for responding to money laundering practices (risk based approach).*

- *We launched a series of training courses for HCMC staff in order to update their knowledge and learn new skills to enhance the performance of their tasks, also concerning HR issues. This action includes participation of HCMC staff in training seminars/webinars organised by ESMA/IOSCO/EC-TSI.*

Supervision

As mentioned in my introduction, in order to enhance the exercise of HCMC powers, we closed all cases pending for more than five years, which was one of our main objectives and was achieved thanks to the consistent efforts in the past 4 years. The completion of this demanding project made it possible to release resources and focus on more effective supervision.

An important development in the area of supervision is the cooperation with the Forensic Science Division of the Hellenic Police, with the aim of developing auditing/forensics tools, as well as training HCMC staff in the use of modern auditing tools.

Apart from our supervisory work, which is set out below, we further enhanced prudential supervision, issued Decisions and Q&As, and sent clarifications to supervised entities etc., in order to inform stakeholders on various issues (e.g. corporate governance, issuers' obligations etc.).

We identified cases of unauthorised business, took necessary action and issued investor warnings. The HCMC focuses on cases of unauthorised business, given the increasing number of cases involving fraud by unauthorised firms and individuals-representatives of online platforms, and issued more than 110 investor warnings in the last 3 years.

We have proposed regulatory changes and are continuously assessing the necessity of other regulatory changes in Greek capital market legislation, including the operation of the HCMC. To that end, the HCMC intends to be engaged in dialogues with listed companies in order to collect their feedback and take it into account to make useful and necessary interventions, which will improve the overall operation of the capital market.

Concerning supervision, which is one of the main tasks of the HCMC in order to ensure the orderly functioning of the market, in 2023 the Hellenic Capital Market Commission imposed total fines of 785,500 euros in 63 cases of violation of capital market legislation by individuals and legal persons and, more specifically, 12 Investment Firms, FIFs, MFMFs, and Banks, 24 listed companies, 22 individuals, and 5 other legal entities, and also issued 5 Regulatory Decisions.

ESG and Sustainable Financing

In 2023, we set new priorities that are in line with those of other EU supervisory authorities. One of these priorities is sustainability and the monitoring of ESG (Environmental, Social, Governance) factors, which are rapidly integrated into the capital markets' institutional framework. The important and on-going issues of Sustainable Finance and EU Taxonomy are included in the priorities for the economy as a whole, and the financial sector in particular. These institutional developments aim at adapting and alerting all participants a) to the issues of the risks inherent in climate change and the other sustainability factors, and b) to the minimum action that is required to ensure that sustainability issues are seriously taken into consideration by capital market entities, as well as in investment and financial decision-making.

The Hellenic Capital Market Commission was actively involved in the consultations for the EU legislation under formation on ESG issues (CSRD, Green Bond Standard, newer ESG regulations) and on the issues addressed by ESMA/OECD and other bodies. Aiming at supervisory convergence, we are in coordination with other EU authorities as regards both monitoring the implementation of European legislation on ESG issues, and resolving any interpretation issues.

We also, took many targeted actions both for the training of HCMC executives and the training of market participants with seminars and conferences. For example, Hellenic Capital Market Commission executives attend European and international agency seminars on Sustainable Finance issues. It is worth noting HCMC involvement in the Technical Support Instrument (TSI 2023 ESG) for the financial sector *(regulatory mapping, data sources and analysis, methodology-tools-supervisory guidance, skills development, and methodologies and tools for dealing with greenwashing).*

In the Annual Report 2023 we are introducing a new section for the presentation of HCMC actions related to Sustainable Finance issues, with the aim of presenting analyses of interest to market participants in Greece and abroad. In this context, the special section of the Annual Report of the Hellenic Capital Market Commission for 2023 presents developments in sustainable finance law, a piece prepared by Professor Christos Gortsos, whom we would like to thank for his assistance.

Financial Literacy

One of the key objectives of the Hellenic Capital Market Commission is promoting financial literacy. Among various actions and initiatives, we organised a conference in collaboration with ELSA Greece (European Law Students' Association), we signed Memoranda of Understanding with major universities (National and Capodistrian University of Athens, Athens University of Economics and Business, University of Piraeus etc.) for cooperation on individual actions, for example conducting seminars on capital market issues, while we completed the drafting of an information leaflet that will be addressed to existing and potential investors. The information leaflet will be published within 2024.

Moreover, we created a dedicated section on our website, in order to post information materials for the purposes of promoting financial literacy, on issues pertaining to the capital market.

New supervisory challenges

A new supervisory challenge is the acceleration of supervisory convergence. To this end, it was important to enhance the participation of HCMC experts at committees/groups of European agencies/bodies.

Another challenge for the Hellenic Capital Market Commission is the supervision of Virtual Assets Services Providers, already within its remit since 2021 concerning money laundering issues. More specifically, until today HCMC supervision as regards crypto-assets concerned only the implementation of the provisions of Law 4557/2018 on the "Prevention and suppression of money laundering and terrorist financing" by the providers of a) exchange services between virtual currencies and fiat currencies, but also b) custodian wallet providers.

The new Regulation (EU) 2023/1114 on markets in crypto-assets (MiCA) establishes obligations concerning a) the issuance/sale of crypto-assets and their admission to trading, b) the provision of *services in crypto-assets, and c) market abuse. Provisions of MiCA concerning the issuance and sale of asset-referenced crypto-assets and stablecoins apply as from as 30 June 2024. All other provisions of MiCA apply as from 30 December 2024. A law-drafting committee is exoected to be established in order to prepare a proposal on the necessay changes in regulation, including the allocation of responsibilities between the HCMC and the BoG, sanction-related issues etc.,.*

On 16 January 2023, Regulation (EU) 2022/2554, the Digital Operational Resilience Act (DORA), came into force, improving, as a single legislative act, the rules concerning Information and Communication Technology (ICT) risks, combining, for the first time, in a consistent manner all existing provisions addressing digital risk in the financial sector. DORA includes targeted rules for a coherent ICT Risk Management Framework, the organised reporting and classification of ICT-related incidents, advanced digital resilience testing, and the establishment, for the first time, of an Oversight Framework for critical ICT third-party service providers. Supervisory challenges are directly related with the above rules and require national regulators to have a deep understanding of the complex ecosystem concerning the provision of ICT services by third parties, as well as effective coordination mechanisms, continual monitoring, and adaptation to the risks emerging in the digital landscape. The challenges for the Hellenic Capital Market Commission, in particular, include the understanding and implementation of the ICT risk management framework, compliance with ICT incident reporting requirements, resilience testing of ICT systems, and effective participation in the Oversight Framework for critical ICT third-party service providers.

The Regulation is expected to come fully into force on 17 January 2025, two years after its publication in the Official Journal of the European Union and following the completion of the issuance of all regulatory and implementing technical standards that specify the provisions of the Regulation and facilitate its implementation. Also in regard to DORA, we are waiting for the formation of a law-drafting committee that will adapt individual provisions to Greek legislation, such as the allocation of responsibilities in Greek state agencies such as the HCMC and the BoG.

Strategic Enhancement of the HCMC

All of us at the Hellenic Capital Market Commission are steadily committed to the further improvement and modernisation of the institutional framework so that it is responsive to the market's demands. To this end we have formulated proposals for legislative changes in line with best international practice.

Apart from our supervisory work, a common denominator of our efforts is to enhance the role of the capital market as a financing mechanism with a multiplier effect for the Greek economy. International and European regulatory developments and the increase in the number of legal texts pertaining to capital market issues, the supervisory convergence of EU regulators, and the increasing use of technology in transactions, have increased to a great extent the breadth of our responsibilities and duties, making it necessary to enhance our Organisation so that it is able to respond to supervisory challenges.

The continuous monitoring and improvement of the institutional framework, the new objects of supervision, and the strong commitment to exercising prudential and enhanced supervision, require experienced and specialised personnel with many skills, in order to ensure the orderly and safer operation of the Greek capital market. A better and more modern organisation, the enhanced use of digital tools, the enrichment of the Hellenic Capital Market Commission's capable human resources with new executives specialised in new technologies, and the continuous exercising of supervision, are necessary conditions in order for the HCMC to carry out its work in an environment of change and realignment in the markets.

The people of the Hellenic Capital Market Commission are the ones contributing to these efforts and I would like to thank them warmly for their morals, consistency and great professionalism.

Vassiliki Lazarakou, JD

Chair of the Hellenic Capital Market Commission
Member of the Management Board of the European Securities and Markets Authority (ESMA)
Member of the Board of the International Organization of Securities Commissions (IOSCO)
Member of the Bureau of the OECD Corporate Governance Committee

PART ONE

THE HELLENIC CAPITAL MARKET COMMISSION

BOARD OF DIRECTORS

As of September 5th, 2019, the Board of the Hellenic Capital Market Commission comprised the following members:

VASSILIKI LAZARAKOU, JD, Chair, Lawyer,

Member of the ESMA Management Board
Member of the IOSCO Board
Member of the Bureau of the OECD Corporate Governance Committee

NIKOS KONTAROUDIS (until 19.12.2023)

First Vice-Chair, Economist

ANASTASIA STAMOU

Second Vice-Chair, Lawyer

GEORGE PASCHAS (Since 23.4.2021)

Member, General Manager for Operations of the BoG

PANAGIOTIS GIANNOPOULOS

Member, Economist, Chairman of the Hellenic Accounting and Auditing Standards Oversight Board

GEORGE LELEDAKIS (Since 19.4.2022)

Member, Associate Professor of Finance Athens University of Economics and Business

ANASTASIOS VIRVILIOS

Member, Lawyer

The Board of Directors of the Hellenic Capital Market Commission consists of seven members: the Chair, two Vice-Chairpersons and four members. The Chair of the Board is appointed by the Minister of Finance, and approved by the competent committee of the Greek Parliament. The two Vice Chairpersons, as well as the other four members are appointed by decision of the Minister of Finance.

The members of the Board are prominent and prestigious persons, with expertise and experience on capital market issues. They exercise their duties under conditions of total personal and operational independence, and are only bound by the law and their conscience. The Chairman and the two Vice-Chairmen are employed full time. The Board is appointed for a five-year term.

The Board of Directors of the HCMC is entrusted, among others, with the following tasks: general policy-making, the introduction of rules and regulations, the granting and revoking of licenses, the imposition of sanctions, and drafting the annual budget.

The Board of Directors is convened by its Chair and meets at least twice a month, provided that at least four (4) of its members are present.

OBJECTIVES AND TASKS

The Hellenic Capital Market Commission was established by Law 1969/1991 and Law 2324/1995, with the purpose of protecting investors and ensuring the orderly operation of the Greek capital market, which is one of the Greek economy's major growth drivers. Both the management and staff of the HCMC are provided, by virtue of European and Greek legislation, with functional and personal independence guarantees in regard to accomplishing their mission.

According to the law, the HCMC has its own exclusive resources and is not financed by the State Budget. The Commission's annual budget is drafted by its Board of Directors and approved by the Minister of Finance.

The Hellenic Capital Market Commission submits its annual report to the Speaker of the Hellenic Parliament and the Minister of Finance. The Chairman of the Hellenic Capital Market Commission is summoned by the competent Commission of the Parliament, to provide updates on capital market issues.

The Hellenic Capital Market Commission is a member of the European Securities and Markets Authority (ESMA). The Chair of the Hellenic Capital Market Commission is a member of the senior administrative body of ESMA, the Board of Supervisors.

Furthermore, the Commission is also a member of the International Organization of Securities Commissions (IOSCO). It also concludes agreements and memoranda of understanding with other *countries' regulatory authorities for the exchange of confidential information, and co-operation on issues that fall under its competence.*

The Hellenic Capital Market Commission is responsible for monitoring compliance with the provisions of capital market law. It is decisively involved in the formation of the capital market regulatory framework, on a national, European and international level, actively contributing to the operations of the Council of the European Union, as well as ESMA and IOSCO. Among others, it supervises Greek and foreign firms offering investment services, undertakings of collective and alternative investments, their Managers, new investment undertakings, occupational insurance funds, listed companies in regard to transparency obligations including their financial statements, as well as listed company shareholders in regard to their obligations to disclose major holdings, approves takeover bids and the prospectuses for share capital increases, and monitors and supervises transactions in regard to market abuse and inside information issues. Finally, it supervises the compliance of supervised persons with anti-money laundering and countering the financing of terrorism legislation.

The entities supervised by the Hellenic Capital Market Commission also include trading venues, clearing houses, the Central Securities Depository, as well as investor indemnity and transaction security schemes, such as the Common Guarantee Fund. It is also following domestic and international developments, conducting research whenever deemed necessary, and provides professional certification to capital market participants. The HCMC also receives and investigates investor complaints.

The Hellenic Capital Market Commission has the authority to impose administrative sanctions and measures (reprimands, fines, trading and license suspension), on supervised natural and legal persons that violate capital market legislation, as well as to submit indictments in cases where there are serious indications of criminal offenses in relation to the capital market.

EXECUTIVE COMMITTEE

The Executive Committee consists of the Chair and the two Vice-Chairpersons and is entrusted with the execution of the decisions made by the Board of Directors. The Executive Committee is convened by the Chair and meets at least once a week, provided that at least two of its members are present. It is responsible for the Commission's daily management and the supervision of its operations. It is also responsible for the judicial representation of the Hellenic Capital Market Commission in front of Greek and foreign courts.

ORGANISATIONAL STRUCTURE

The current organisation structure (Figure 1) and the responsibilities of the departments of the HCMC are specified by Presidential Decree 65/2009 (Government Gazette 88/9.6.2009). It should be noted that the provisions of article 8 of Law 4916/2022 (Government Gazette A΄65/28-3-2022) set out the new structure of HCMC services, which will come into force when its new Organisation Chart is prepared and the relevant Presidential Decree is issued.

Pursuant to article 78A of Law 1969/1991, as amended by paragraphs 2 and 3 of article 78 of Law 4706/2020, a nine-member Advisory Committee has been established, its task being to present the Board of the Hellenic Capital Market Commission with opinions on new regulations. The Advisory Committee submits proposals for improving the operation of the markets and mandatorily issues an opinion whenever the HCMC officially presents the competent Ministry with proposals for the adoption of legislation and regulation on issues pertaining to the operation of supervised entities and, in general, the capital market.

The members of the Advisory Committee are appointed by the Minister of Finance and presently represent the Athens Stock Exchange, the Union of Listed Companies (ENEISET), the Association of Members of the Athens Exchanges (SMEXA), the Hellenic Bank Association (EET), the Hellenic Fund and Asset Management Association (ETHE), the Association of Companies on Investment Services in Securities (SEDYKA), the Hellenic Investors Association (SED), and the Hellenic Venture Capital Association. Chair of the Committee, without the right to vote, is the Chair of the HCMC. The term of the Advisory Committee's members is three years.

Finally, in accordance with the provisions of Law 4335/2015, as amended by Law 5042/2023 (in implementation of Regulation (EU) 2021/23 on a framework for the recovery and resolution of central counterparties), the Resolution Committee (RC) has been established at the HCMC since 2015, responsible for the implementation of resolution measures investment firms and central counterparties and having the following responsibilities:

a) exercising the resolution powers and carrying out the resolution actions assigned to the resolution authority and provided for by Law 4335/2015 and Regulation (EU) 2021/23;

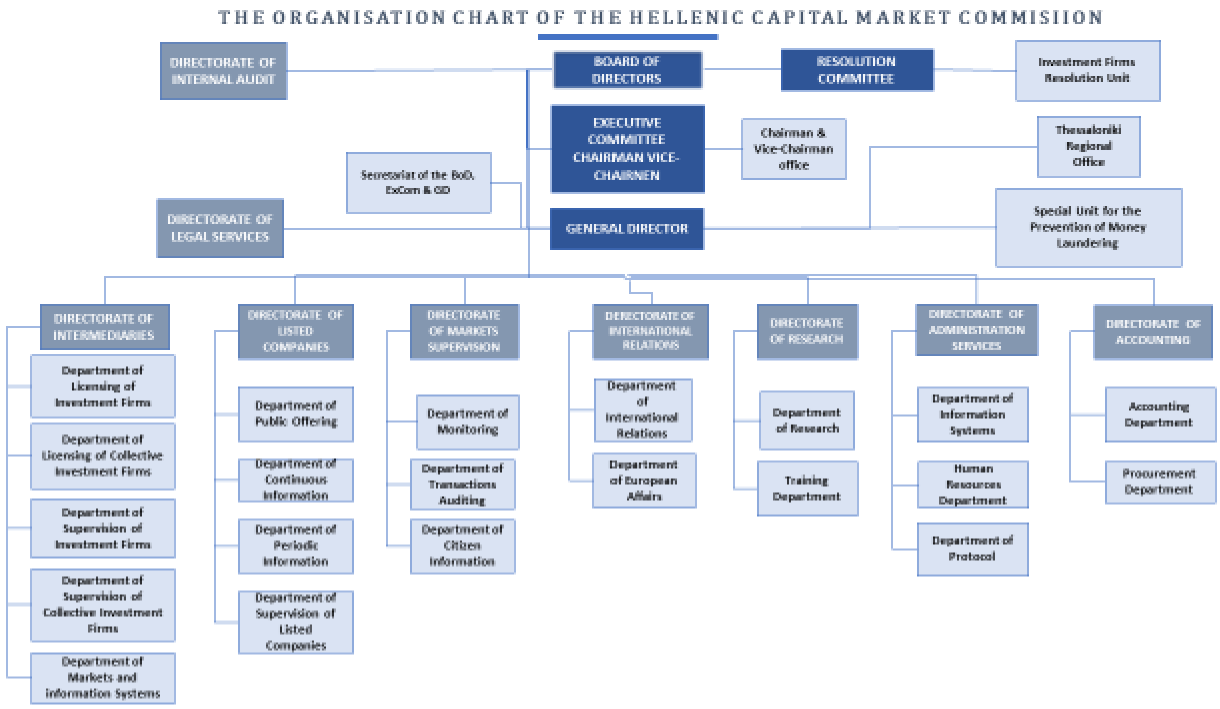
b) issuing all the personal administrative acts and making the decisions provided for by this law, excluding those pertaining to the imposition of administrative sanctions and those falling under the sole responsibility of the Hellenic Capital Market Commission as competent authority;

c) making proposals to the Board of the Hellenic Capital Market Commission on one hand for the imposition of administrative sanctions and on the other hand for making decisions falling under the sole responsibility of the Hellenic Capital Market Commission in accordance with Law 4335/2015 as currently in force;

d) making proposals to the Board of the Hellenic Capital Market Commission for the issuance of the regulatory decisions provided for by Law 4335/2015 as currently in force.

In order to exercise its duties effectively, the RC is assisted and supported by the Resolution Unit, which operates at department level, is autonomous and directly attached to the Resolution Committee. Upon exercising its duties the RC is not subject to instructions or orders from any other body of the Hellenic Capital Market Commission or any other government body.

FIGURE 1. The Organisation Chart of the Hellenic Capital Market Commission (PD 65/2009)



THE FIVE-YEAR STRATEGIC PLAN OF THE HCMC, 2022-2027

The 5-year Strategic Plan of the HCMC was approved by its Board of Directors by means of Decision 1/967/11.10.2022 . It drafting is mandated by the provisions of article 4 of Law 4916/2022. The 5-year Strategic Plan of the HCMC is posted on the HCMC website.

The 5-year Strategic Plan of the HCMC, which was published on 11 October, 2022, is prepared for the first time and sets out its priority targets for the next five years (2022-2027), in order to ensure that the HCMC fulfills its mission, enhances investor protection, promotes stability in and the orderly operation of the capital market, and maintains market integrity. By implementing it the HCMC aims at responding to the challenges facing capital markets and investors at the national and EU levels. This includes the development of a private investor base, the promotion of sustainable financing and forward-looking markets, and dealing with the opportunities and risks created by digitisation and innovation in the financial sector.

Moreover, the Strategic Plan of the HCMC sets out the long-term strategic direction to be followed, includes short- and medium-term strategic objectives, and describes the mission and key values of the HCMC. It should be noted that the Annual Operational Plan of the HCMC, which was published on January 17, 2023, specifies the actions and projects for the implementation of these objectives.

The pillars/targets of the 5-year Strategic Plan of the HCMC are the following five, and each pillar is accompanied by specific commitments:

1. ***Contribution to the development of the capital market through the formation of the regulatory framework and its efficient implementation, the improvement of information and transparency in the market, and the simplification of procedures;***
2. ***Use of new technologies and establishment of new methods of supervision, emphasising on the prudential supervision of the market;***
3. ***Maintaining the priority to investor protection;***
4. ***Sustainability and establishment of the supervisory ways of the relevant issues; and***
5. ***Innovation – Digital Transformation of the HCMC.***

The preparation of the Strategic Plan of the HCMC was based on SWOT (Strengths, Weaknesses, Opportunities, and Threats) analysis in the context of the current health and, at the same time, financial crisis. The power of the Hellenic Capital Market Commission stems from its core competence and the conduct of specialized audits, the identification of violations, the proper implementation, as well as the *co-shaping of the capital market's legal framework, which is effectively based on the expertise, knowledge, long-standing experience of its staff, its operational structure, the long-standing knowledge of the stock exchange environment and the investment intermediaries, as well as institutional and legal grounds. The selection of the strategy to be pursued by the HCMC in the next 5-years took into account the strategic targets of the European Securities and Markets Authority (ESMA), as well as other European capital market regulators, in order to be consistent with developments in international capital markets and global supervisory trends. The HCMC is committed to promote the goal of ESMA and all other EU national competent authorities concerning supervisory convergence in Europe, especially in regard to issues essential to investor protection, sustainable financing, investment product promotion and distribution practices, and proper corporate governance.*

It should be noted that the development of the capital market in Greece requires the existence of an appropriate and updated regulatory and supervisory framework, which affects investors, consumers, businesses and, in general, the country's economy. The institutional objectives of the HCMC include the orderly operation of capital markets, investor protection, and preserving the integrity of the market. The HCMC is actively monitoring the forthcoming changes in financial services and continues to adapt, in order to be able to respond to the continuing consequences of the health crisis, the geopolitical tensions, including the Russian invasion of Ukraine, technological advances, the requirements of transition to sustainable financing and, in general, new macroeconomic conditions, because of the geopolitical instability and the consequent increase of risks and challenges in capital markets.

THE OPERATIONAL PLAN OF THE HCMC FOR 2024

*The **Operational Plan** of the HCMC for the year 2024 was approved by its Board of Directors by means of Decision 19/1007/21.12.2023. Its drafting is mandated by the provisions of article 4 of Law 4916/2022. The Annual Operational Plan is posted on the HCMC website and provides a roadmap for implementing the annual planning of the HCMC, mainly financed by the Recovery Fund, the NSRF, and own resources of the HCMC. The Operational Plan elaborates on the Operating Pillars per Strategic Target (see 5-year Strategic Plan of the HCMC), which are further analysed into annual targets, actions and projects per operating unit of the HCMC.*

More specifically, the Operational Plan of the HCMC is presented in Appendix 2.

	THE HCMC IN NUMBERS, 2023
1	DECISIONS OF THE BOARD: 353 decisions at 34 meetings
2	DECISIONS OF THE EXECUTIVE COMMITTEE 552 decisions at 81 meetings
3	HCMC REGULATORY DECISIONS: 5
4	PROSPECTUS APPROVALS: 11 +1 Supplementary Prospectus
5	CAPITAL RAISING: 2,651 million euros
6	CERTIFICATIONS: RENEWAL OF 106 CERTIFICATES, ISSUANCE OF 190 NEW CERTIFICATES, AND ISSUANCE OF 11 CERTIFICATES WITHOUT PARTICIPATION IN EXAMS OR ATTENDANCE TO SEMINARS
7	INVESTOR WARNINGS: 69
8	PENALTIES: 785,500 euros
9	COMPLAINTS PROCESSED: 204
10	NUMBER OF EMPLOYEES: 153 (i.e. 59 men, 94 women, including 6 retirements, 3 new hires, and 2 secondments)

MARKET DEVELOPMENTS

MACROECONOMIC DEVELOPMENTS

The Greek economy

In 2023, the Greek economy continued to grow at a satisfactory rate (2%) higher than the corresponding growth rate of the eurozone (0.4%), proving its resilience in an adverse and uncertain international environment (high inflation. high interest rates, stricter financing terms, energy price uncertainty). As a result, however, of the uncertainty prevailing in the global economy the growth rate of the Greek economy fell in 2023 as compared to 2022, when annual GDP growth stood at 5.6%.

The largest contribution to economic growth in 2023 was that of gross fixed capital formation, which increased by 4% in real terms year-on-year. Investment growth is to a great extent due to increased investment in housing. A key component of the Greek economy's growth in 2023 was, as in 2022, the increase in private consumption (1.8%) and in the exports of goods and services (3.7%), which received a considerable boost by the recovery of tourism. In contrast, the increase in the imports of goods and services by 2.1% in 2023, which is due to the growth of private consumption and investment, had a negative effect on GDP growth.

The rise of private consumption was facilitated by the improvement of conditions in the labour market. The reduction of the unemployment rate, the satisfactory growth of employment, the increase of nominal wages, and the support of incomes through fiscal policy measures, helped contain to a great extent the negative impact of the energy crisis and inflationary pressures on private consumption and economic growth.

According to ELSTAT's Labour Force Survey, the seasonally adjusted unemployment rate stood at 10.4% in December 2023, reduced by 1.4 percentage points as compared to the unemployment rate in December 2022 (11.8%). The unemployment rate of December 2023 is the lowest since 2010. In 2023, the average annual unemployment rate fell by 1.4 percentage points as compared to 2022. The number of the unemployed fell to 493.4 thousand in December 2023 from 561.7 thousand in the same month of 2022, reduced by 12.6% or by 68.3 thousand persons. On the other hand, employment growth stood at 1.6% or 67.2 thousand persons, with the number of those employed rising to 4,264.3 thousand in December 2023 from 4,170.1 thousand in the same month of 2022. According to data from the "ERGANI" IT system, the balance of salaried employment flows for the year 2023 is positive and stands at 115,768 new jobs. In total, in the period from January to December 2023 hiring announcements stood at 3,219,300 and departures stood at 3,103,532. Employment growth occurred alongside the increase in the minimum salary from 663 euros in January 2022 and 713 euros in May 2022 to 780 euros in April 2023. It should be noted that, according to seasonally adjusted data from the quarterly national accounts of ELSTAT, in the third quarter of 2023 the total remuneration of employees increased by 3.8% year-on-year.

The economic sentiment indicator in Greece, which is compiled by the Foundation for Economic and Industrial Research (IOVE) in cooperation with the European Commission, moved upwards in 2023 and its average value rose to 108 points from 105.5 points in 2022, a performance that, on an annual basis, is the best of the past 15 years. In contrast, the corresponding indicators in the EU and the eurozone fell sharply compared to the previous year and their annual average value stood at 95.1 and 96.2 points respectively.

The growth rate of the Harmonized Index of Consumer Prices (HICP) was substantially reduced in 2023, falling to 4.1% from 9.3% in 2022. This de-escalation is mainly due to the reduction of energy prices. However, the general price index excluding energy stood at high levels, due to upward pressures on food products, as well as on non-energy industrial goods and services. Food inflation decreased year-on-year, albeit remained high (8.9%). Average annual core inflation (which excludes energy and food prices) stood higher than the HICP in 2023, at 5.3%, albeit fell below the HICP in December 2023. This reflects a gradual reduction of the pressure exerted by demand on core prices, and the lower-than-expected passing on of energy and food price increases. It should be noted that the average change of the HICP in the eurozone rose to 5.4% in 2023 from 6.4% in 2022. The change of the HICP in Greece places the country below the eurozone average.

According to the data concerning the execution of the State Budget (SB), on an adjusted cash basis, for the period January-December 2023, there was a deficit of 3,760 million euros, against a target of 8,338 million euros in the State Budget Proposal for 2024 for the said period of 2023, and as compared to a 11,656 million euro deficit for the corresponding period of 2022. The primary balance, on an adjusted cash basis, amounted to a surplus of 3,920 million euros, against a primary deficit target of 851 million euros and a primary deficit of 6,652 million euros for the same period of 2022. In the same period, the net revenues of the State Budget stood at 67,005 million euros, 1,810 million euros higher than the target for the corresponding period that has been included in the State Budget Proposal for 2024. This result is mainly due to the disbursement of 1,687 million euros from the Recovery and Resilience Facility (RFF) in December, which was projected for March 2024. Excluding the disbursement of the above amount from the RFF, net revenues were 123 million euros or 0.2% higher than the target. Total SB revenues stood at 73,998 million euros, 2,126 million euros or 3.0% higher than the target. On the debit side, SB expenditure *stood at 70,765 million euros, 2,767 million euros lower than the target (73,533 million euros) that has been included in the State Budget Proposal for 2024. It is also reduced by 513 million euros year-on-year, mainly because of reduced cash payments for the military procurement programmes of the Ministry of National Defence.*

According to Ministry of Finance estimates, the General Government deficit as a percentage of GDP was reduced from 2.4% in 2022 to 2.1% in 2023. The primary balance remained in surplus in 2023, and stood at 1.1% of GDP, as compared to a 0.1% surplus in 2022 and deficit equivalent to 4.5% of GDP in 2021. The year-on-year increase of the primary surplus in 2023 is due to the growth of tax revenues and social security contributions as a result of burgeoning economic activity, as well as the increase in electronic transactions and tax audits, which improved collectibility.

The General Government debt is estimated to have marginally increased in absolute terms in 2023, albeit was substantially reduced as a percentage of GDP, to 160.3% from 172.6% in 2022. This development is due to GDP growth. In absolute terms, the public debt rose to 357 billion euros in 2023 (according to the public debt bulletins as per December 2023) from 356.6 billion euros in 2022. The composition of general government debt, which is estimated at 401 billion euros in 2023 (as compared to 400.3 billion euros in 2022), was the following: 50% loans from ESM, EFSF, Sure, and Recovery and Resilience Facility; 25.6% bonds and treasury bills; 11.6% other loans; and 13.4% repos, while its maturity extends to the year 2070.

The steady improvement of fiscal aggregates and the commitment to the implementation of a reform programme led in 2023 to the upgrading of the Greek government's credit rating and the restoration of its investment grade. This development, which occurred amidst international uncertainty because of geopolitical developments and increasing financial risks, constitutes a landmark for the Greek economy. More specifically, the Scope Ratings agency in August, the DBRS agency in early September, the S&P agency in October, and the Fitch Ratings agency in early December 2023 upgraded the Greek government's credit rating to investment grade. As a result, Greek government bond yields, as well as their spreads from other eurozone government bonds, were significantly reduced during 2023. More specifically, the spread between the Greek 10-year bond and the German reference 10-year bond fell from 203 basis points in January to 119 basis points in December 2023.

As regards developments in the external sector of the economy in 2023, the current account deficit was reduced by 7.1 billion euros year-on-year to 14.1 billion euros. The balance of goods deficit was also reduced, as the decrease in imports exceeded that of exports. At constant prices, exports decreased by 4.1%, and imports decreased by 4.6%. More specifically, at constant prices, the exports of goods excluding fuel decreased by 6.5%, while the corresponding imports decreased by 4.0%. The balance of services surplus was widened, primarily because of the improvement of the travel balance and secondarily because of the improvement of the other services balance, which was partly offset by the worsening of the transport balance. The arrivals of non-resident travelers increased by 17.6% year-on-year, and the relevant receipts were up by 15.7%. In 2023, the capital account surplus decreased year-on-year and stood at 2.7 billion euros, as all the other sectors of the economy, excluding the general government, registered net payments instead of net receipts. Finally, the overall capital account deficit was reduced in 2023 as compared to 2022 (by 7.2 billion euros) and stood at 9 billion euros. At the end of December 2023, Greece's foreign exchange reserves stood at 12.3 billion euros, as compared to 11.3 billion euros at the end of December 2022.

In 2023, bank rates increased as a result of stricter monetary policy, albeit the rise in bank deposit rates was smaller than the rise of the Eurosystem's monetary policy rates and of the money market rates in the eurozone. The average interest rates of household deposits with durations of up to two years rose to 1.68% in December 2023 from 0.22% in December 2022, while the weighted average rate of existing deposit balances rose to 0.51% from 0.09 in 2022. The weighted average rate of existing loan balances rose to 6.35% in December 2023 from 5.02% in the same month of 2022. As a result the interest rate *spread between existing deposits and loans rose to 5.84 percentage points in December 2023, from 4.93 percentage points in December 2022. All the above, led to a shift of household and business cash balances towards term deposits, especially in regard to deposits with durations of more than a year. That said, 75% of private sector deposits are still kept in overnight accounts.*

The evolution of savings and financing during 2023, is presented in the following table. Based on Bank of Greece data, the propensity to save has been gradually slowing down since 2021. In 2023, deposit growth fell to 3.1% from 4.5% in 2022. Lending to the domestic private sector by domestic financial institutions increased in 2023, albeit also at a slower pace, which stood at 3.6 % at the end of the year as compared to 6.3% at the end of 2022. Despite the slowdown of the current year, the prospects of the annual growth of business financing remain positive, notwithstanding the negative impact of increased lending rates. This is also due to the financing of investments included in the Recovery and Resilience Facility through bank loans. Credit expansion will also be positively affected by the financing resources that will be made available by banks and the European Investment Bank (EIB) as part of the National Strategic Reference Framework (NSRF) 2021-2027.

Finally, the upgrade of the Greek government's credit rating to investment grade has a positive effect on the prospects of Greek banks, since it automatically improves the quality of their portfolios and is expected to lead to further upgrades of their credit ratings, which will result to the containment of their borrowing costs and the increase of their available liquidity. In the long term, the upgrade of the credit rating of both the Greek government and the Greek banks will have a significant positive effect on economic activity.

TABLE 1. Macroeconomic indicators of Greece, 2021-2023

Amount - Indicators	***2023***	***2022***	***2021***
***GDP**, y-o-y changes, based on EU data, 2022*	*2.0*	*5.6*	*8.4*
Employment and unemployment			
Net inflow of salaried employment in the private sector (number of individuals)	*116,649*	*72,847*	*133,082*
Unemployment rate (Annual averages, %; seasonally adjusted data)	*11.0*	*12.4*	*14.8*
Prices and wages			
Harmonized Index of Consumer Prices (average y-o-y change, %)	*4.1*	*9.3*	*0.6*
Public finances			
General Government Balance (ESA basis, % of GDP)	*-2.1*	*-2.4*	*-7.0*
General Government Primary Balance (ESA basis, % of GDP)	*1.1*	*0.1*	*-4.5*
Central Government Debt (€ million)	*401,000**	*400,276*	*388,337*

Amount - Indicators	2023	2022	2021
General Government Debt (€ million)	357,000*	356,597	353,848
(% of GDP)	(160.3)	(172.6)	(195.0)
Balance of payments (€ million, net change, Jan-Dec)			
Current account	-14,131.3	-21,225.6	-10,964.4
Capital account	2,677.0	3,111.6	4,000.9
Financial account	-8,955.5	-16,152.0	-7,107.6
Monetary conditions			
Private sector deposits with domestic financial institutions (y-o-y change, end of year)	3.1%	4.5%	9.9%
Domestic private sector financing (% y-o-y change, end of year) by domestic financial institutions	3.6%	6.3%	1.4%
GDP at current market prices (€ million)	222,766*	206,620	181,500

Source: ELSTAT, EUROSTAT, ERGANI, Ministry of Finance, Bank of Greece, 2023 Stage Budget estimates.
**Ministry of Finance estimate (public debt bulletin)*

The International Economy

In 2023, the global economy continued to recover from the negative effects of the pandemic and the energy crisis that followed Russia's invasion of Ukraine. However, growth rates were held back by restrictive counter-inflation monetary policy and reduced public expenditure amidst a high-debt environment, as well as by the continuing disruption of supply chains as a result of geopolitical developments. The International Monetary Fund (IMF) estimates that global economic growth slowed down from 3.5% in 2022 to 3% in 2023. The growth rate of the global economy remains below the 3.8% annual average rate for 2000-2019. The growth rate of real gross domestic product (GDP) of advanced economies fell, according to the IMF, from 2.6% in 2022 to 1.5% in 2023, while emerging and developing economies saw a marginal drop from 4.1% in 2022 to 4% in 2023.

According to OECD estimates, growth in the OECD zone was slightly reduced from 2.9% in 2022 to 1.6% in 2023. Among the most developed economies, growth in the US rose from 1.9% in 2022 to 2.5% in 2023, in Japan it rose to 1.9% from 1% in 2022, in Canada fell to 1.5% from 3.8% in 2022, and in the United Kingdom it was significantly slowed down to 0.1% in 2023 from 4.3% in 2022.

As regards emerging and developing economies, the IMF estimates that China grew by 5% in 2023 as compared to 3% in 2022, and India grew by 6.3% in 2023 as compared to 7.2% in 2022.

According to the European Statistical Service (Eurostat), annual GDP growth in both the EU and the eurozone fell to 0.4% in 2023 from 3.4% in 2022. Among the largest economies of the eurozone, *Germany registered marginally negative growth in 2023 (-0.3%) mainly because of the decline of investment in construction and machinery, while France and Italy grew at annual rates of 0.7% and 0.9% respectively. However, there are marked differences among EU member-states. Malta was the EU country with the highest growth rate in 2023 (5.6%), whereas Ireland was the country that suffered the greatest y-o-y real GDP contraction (-3.2%). Estonia's GDP also fell by a staggering 3%, mainly owing to the country's exposure to the financial impact of the war in Ukraine and the consequent economic sanctions on Russia. In 2023, GDP also fell in Finland (-1%), Lithuania (-0.3%), Luxembourg (-1.1%), Hungary (-0.9%), Austria (-0.8%), Czechia (-0.5%), and Sweden (-0.2%), while growth was stronger in Croatia (2.8%), Spain (2.5%), Cyprus (2.5%), Portugal (2.3%), Romania (2.1%), Greece (2%), Denmark (1.8%), Bulgaria (1.8%), Slovenia (1.6%), Belgium (1.3%) and Slovakia (1.1%), thus offsetting the negative effect of the other member-states.*

The low positive growth rates of the European economy in 2023 are mainly due to the momentum of the strong post-pandemic recovery that occurred in the previous two years. As early as the end of 2022, economic expansion came to an abrupt halt, and since then economic activity in Europe has been almost stagnant, in an environment of falling purchasing power, weak external demand, restrictive monetary policy, and gradual cutback of fiscal support. However, the European economy avoided entering a technical recession in the second half of the year, while there were also some positive developments, mainly in the inflation front.

In 2023, the global economy continued to be faced with the inflation challenge, the IMF, though, estimates that the global price growth rate fell from 8.7% in 2022 to 6.9% in 2023, as a result of restrictive monetary policy and the de-escalation of key commodity international prices, mainly energy and, to a lesser extent, food prices. The reduction of the inflation rate was faster in developed economies than in emerging and developing economies. In developed economies inflation fell from 7.3% in 2022 to 4.7% in 2023, while in emerging and developing economies it is estimated to have fallen from 9.8% in 2022 to 8.3% in 2023.

In the US, the inflation rate continued to fall from 8% in 2022 to 4.2% in 2023, albeit remaining above the 2% target set by the Federal Reserve, which continued to pursue restrictive monetary policy in 2023, increasing its base rates four times by 25 basis points each time between February and July 2023. In July 2023, the current base rate range rose to 5.2-5.5 % from 4.25-4.5% in December 2022.

In the European Union, the inflation rate fell to 6.4% in 2023 from 9.2% in 2022. In the eurozone, the restrictive monetary policy of the European Central Bank (ECB) and the consequent drop in domestic demand contributed to the easing of inflationary pressures. Moreover, the appreciation of the euro reduced the prices of imported goods. According to Eurostat estimates, inflation in the eurozone, measured by the Harmonized Index of Consumer Prices, fell to 5.4% in 2023 from 8.4% in 2022. However, the inflation rate remained above the target set by the ECB (2%).

In order to contain aggregate demand by creating restrictive financing conditions and slowing down credit expansion in order to help bring back inflation to the medium-term target of 2%, the ECB raised its base rates in June, July and September 2023 by 25 basis points each time. In addition, the ECB set the interest rate on the banks' compulsory reserve deposits with national central banks to 0%, effective from the end of September 2023, in order to help transmit the changes in the Eurosystem's base rates to money market rates.

Restrictive monetary policy resulted to a slowdown in the expansion of bank financing to both businesses and households in 2023. Consistent with this slowdown, the growth of broad money supply (M3) in the eurozone, was significantly reduced and dropped to negative territory.

In 2023, the slowdown of economic growth, the escalation of geopolitical uncertainty, and the relative increase of the demand for services compared to the demand for goods, caused global trade to decline. At the same time, the strong appreciation of the US dollar in 2022 also contributed to the weakening of trade flows. According to the latest IMF estimates, the volume of global trade in goods and services increased by only 0.9% in 2023, compared to 5.1% in 2022. As a result of the above, the average annual price of OPEC crude oil fell to 82.95 US dollars per barrel in 2023 from 100.08 US dollars per barrel in 2022. Compared, however, to an OPEC crude oil price of 81.29 US dollars per barrel at the end of December 2022, there was a drop to 78.44 US dollars per barrel at the end of December 2023. Finally, the wholesale spot market price for natural gas returned at pre-Ukraine war levels, albeit remaining three times higher than the price prevailing in July 2019.

Despite the slowdown in economic activity, the performance of the EU labour market was satisfactory in 2023. According to Eurostat data, the unemployment rate in the EU fell from 6.1% in December 2022 to 6% in the same month of 2023. This percentage is the lowest recorded by Eurostat since April 1998, when it started compiling the relevant time series. In the eurozone, the unemployment rate was also reduced and stood at the historic low of 6.5% in December 2023, as compared to 6.7% in December 2022. In total, 13.2 million people were unemployed in the EU in December 2023, of which 11 million in the eurozone. The highest unemployment rates in December 2023 were recorded in Spain (11.6%), Greece (10.4%), Lithuania (7.7%), and Finland (7.7%). The lowest unemployment rates were recorded in Malta (2.6%), Poland (2.9%), Czechia (3%), and Germany (3.1%). Total employment increased by 1.4% in the eurozone and by 1.2% in the EU in 2023. In 2022, these percentages were 2.3% and 2% respectively. Moreover, in the third quarter of 2023, employment stood at 61.3% of the EU population aged 15-74, the highest percentage since 2021. Finally, the total number of working hours increased by 1.3% in the eurozone and by 1% in the EU in 2023, as compared to 3.4% and 2.8% respectively in 2022.

In 2023, the measures for dealing with the energy crisis continued to affect fiscal results, albeit to a lesser extent than in 2022. According to European Commission estimates, the net cost of the measures for dealing with the energy crisis fell to 0.9% of EU GDP in 2023, from 1.2% in 2022. In the third quarter of 2023, the seasonally adjusted general government debt to GDP ratio stood at 2.8% in both the EU and the eurozone, being reduced year-on-year (-4% and -4.1% respectively in the third quarter of 2022).

In 2023, public debt in the EU was further reduced, despite the fact that strong revenue growth of 2022 started to wear out, while pressure on the expenditure side persisted. At the end of the third quarter of 2023, gross general government debt in the EU fell to 82.6% of GDP from 84.6% in the same quarter of 2022. In the eurozone, the public debt to GDP ratio also fell to 89.9% in the third quarter of 2023, from 92.2% in 2022. On a year-on-year basis, the public debt to GDP ratio was increased in eight member-states and was reduced in 19 member-states in the third quarter of 2023. The largest reductions were recorded in Greece (-12 percentage points), Portugal (-10.9 percentage points) and France (-10.3 percentage points).

TABLE 2. Macroeconomic indicators of the EU, 2020-2023

Country	Gross domestic product (y-o-y change, volumes)			Unemployment (%)			Inflation (Harmonized Index of Consumer Prices-HICP, average change y-o-y)			Public Debt (% GDP)		
	2023	2022	2021	2023*	2022	2021	2023	2022	2021	Q3-2023	2022	2021
Austria	-0.8	4.8	4.2	5.4	4.8	6.2	7.7	8.6	2.8	78.2	78.4	82.5
Belgium	1.3	3.0	6.9	5.6	5.6	6.3	2.3	10.3	3.2	108.0	108.0	104.3
France	0.7	2.5	6.4	7.6	7.3	7.9	5.7	5.9	2.1	111.9	111.8	112.9
Germany	-0.3	1.8	3.2	3.1	3.1	3.7	6.0	8.7	3.2	64.8	66.1	69.0
Greece	2.0	5.6	8.4	10.4	12.5	14.7	4.2	9.3	0.6	165.5	172.6	195.0
Estonia	-3.0	-0.5	7.2	6.9	5.6	6.2	9.1	19.4	4.5	18.2	18.5	17.8
Ireland	-3.2	9.4	15.1	4.5	4.5	6.2	5.2	8.1	2.4	43.6	44.4	54.4
Spain	2.5	5.8	6.4	11.7	12.9	14.8	3.4	8.3	3.0	109.8	111.6	116.8
Italy	0.9	3.7	8.3	7.2	8.1	9.5	5.9	8.7	1.9	140.6	141.7	147.1
Cyprus	2.5	5.1	9.9	6.3	6.8	7.5	3.9	8.1	2.3	79.4	85.6	99.3
Latvia	-0.3	3.4	6.7	7.0	6.9	7.6	9.1	17.2	3.2	41.4	41.0	44.0
Luxembourg	-1.1	1.4	7.2	5.5	4.6	5.3	2.9	8.2	3.5	25.7	24.7	24.5
Malta	5.6	8.2	12.6	2.4	3.6	4.1	5.6	6.1	0.7	49.3	52.3	54.0
Netherlands	0.1	4.3	6.2	3.6	3.5	4.2	4.1	11.6	2.8	45.9	50.1	51.7
Portugal	2.3	6.8	5.7	6.5	6.2	6.7	5.3	8.1	0.9	107.5	112.4	124.5

Country	Gross domestic product (y-o-y change, volumes)			Unemployment (%)			Inflation (Harmonized Index of Consumer Prices-HICP, average change y-o-y)			Public Debt (% GDP)		
	2023	2022	2021	2023*	2022	2021	2023	2022	2021	Q3-2023	2022	2021
Slovakia	1.1	1.8	4.8	5.6	6.1	6.8	11.0	12.1	2.8	58.6	57.8	61.1
Slovenia	1.6	2.5	8.2	3.4	4.0	4.8	7.2	9.3	2.0	71.4	72.3	74.4
Finland	-1.0	1.6	2.8	7.5	6.8	7.7	4.3	7.2	2.1	73.8	73.3	72.5
Bulgaria	1.8	3.9	7.7	4.3	4.3	5.3	8.6	13.0	2.8	21.0	22.6	23.9
Czechia	-0.5	2.4	3.6	2.8	2.2	2.8	12.0	14.8	3.3	44.5	44.2	42.0
Croatia	2.8	6.3	13.8	6.1	7.0	7.6	8.4	10.7	2.7	64.4	68.2	78.1
Lithuania	-0.3	2.4	6.3	7.0	6.0	7.1	8.7	18.9	4.6	37.4	38.1	43.4
Hungary	-0.9	4.6	7.1	4.2	3.6	4.1	17.0	15.3	5.2	75.0	73.9	76.7
Poland	0.2	5.3	6.9	3.0	2.9	3.4	10.9	13.2	5.2	48.7	49.3	53.6
Romania	2.1	4.6	5.7	5.6	5.6	5.6	9.7	12.0	4.1	48.9	47.2	48.5
Sweden	-0.2	1.9	6.1	8.1	7.5	8.8	5.9	8.1	2.7	30.1	32.9	36.5
Denmark	1.8	2.7	6.8	5.0	4.5	5.1	3.4	8.5	1.9	29.7	29.8	36.0

Source: EUROSTAT
** December 2023*

OVERVIEW OF THE CAPITAL MARKET

International Capital Markets

- ***Capital Markets Union: The European Commission proposes new rules to protect and empower retail investors in the EU***

The Commission approved a Retail Investment Package that places the consumers' interests at the centre of retail investing. The aim is to empower retail investors (i.e. non-professional "consumer" investors) to make investment decisions that are aligned with their needs and preferences, ensuring that they are fairly treated and duly protected. This will enhance the retail investors' trust and *confidence so that they can safely invest in their future and take full advantage of the EU's Capital Markets Union.*

One of the European Commission's three key objectives of the 2020 Capital Markets Union Action Plan was to make the EU an even safer place for retail investment in the long term. This package aims at achieving that goal and encouraging participation in EU capital markets, which has traditionally been lower than in other jurisdictions, such as the United States – even though the Europeans' are savings rates very high. Boosting the Capital Markets Union is also an essential means for channeling private funding into the EU economy and for funding the green and digital transitions.

Specifically, the package includes ambitious and wide-ranging measures for:

- ***Improving the way information is provided to retail investors** about investment products and services, in ways that are more meaningful and standardised, by adapting disclosure rules to the digital age and to the investors' growing preference for sustainable investments;*
- ***Increasing the transparency** and comparability of costs, by requiring the use of a standard presentation and terminology on costs. This will ensure that investment products bring real value for money to retail investors;*
- *Ensuring that all retail clients receive at least annually a **clear view of the investment performance of their portfolios**;*
- ***Addressing potential conflicts of interest in the distribution of investment products** by banning inducements for "execution-only" sales (i.e. where no advice is provided) and ensuring that financial advice is aligned with retail investors' best interests. Stricter safeguards and transparency will also be introduced where inducements are allowed;*
- ***Protecting retail investors from misleading marketing** by means of a provision stating that financial intermediaries (i.e. advisors) are fully responsible for the use (and misuse) of their marketing communication, including where it is made via social media, or via celebrities or other third parties that they remunerate or incentivise;*
- ***Preserving high standards of professional qualifications for financial advisors**;*
- ***Empowering consumers to make better financial decisions**, by encouraging Member States to implement national measures that support the citizens' financial literacy, regardless of their age, and social and educational background*
- ***Reducing administrative burdens and improving the accessibility** of sophisticated retail investors to products and services, by making the eligibility criteria to become a professional investor more proportionate;*
- ***Enhancing supervisory cooperation** to make it easier for national competent authorities and European Supervisory Authorities to ensure that rules are properly and effectively applied in a coherent manner across the EU and to jointly fight fraud and malpractices.*

This package is wide-ranging in scope and pertains to the entire investment journey of the consumer It consists of an amending Directive, which revises the existing rules set out in the Markets in Financial Instruments Directive (MiFID II), the Insurance Distribution Directive (IDD), the Undertaking for Collective Investment in Transferable Securities (UCITS) Directive, the Alternative Investment Fund Managers Directive (AIFMD), and the taking-up and pursuit of the business of Insurance and Reinsurance Directive (Solvency II), as well as an amending Regulation, which revises the Packaged Retail and Insurance-based Investment Products (PRIIPs) Regulation.

For more information, see:

- *Q & A https://ec.europa.eu/commission/presscorner/detail/el/qanda_23_2869*
- *Legislative proposals and information bulletin https://finance.ec.europa.eu/publications/retail-investment-package_en*

- ***ESMA Report on Trends, Risk and Vulnerabilities (TRV) Report No.2, 2023***

Risk summary and outlook: *In the first half of 2023, financial markets recovered, owing to lower energy prices and to the expectations of a slower pace of monetary tightening. Financial markets are adapting to the new economic environment of persistently higher interest rates and inflation, and are highly reactive to adverse events. The collapse of many regional banks in the US rekindled concerns about the banking sector and caused a brief episode of instability. The overall risks falling under ESMA's remit remain at high or very high levels. Going forward, markets are about to remain very sensitive, especially to potential deteriorations in economic fundamentals or risks in financial institutions, while keeping a close eye on private and public debt sustainability in the context of higher interest rates. Therefore there is a high risk of corrections in a context of fragile market liquidity in the equity, bond and crypto markets. Volatility and inflation also increase medium-term risks for consumers, especially in regard to losses from negative real returns.*

Securities markets: *Equity markets rose in the first half of 2023, even though the market stress related to US banks led to increased volatility and increased spreads in March and April. Uncertainty continued to prevail in fixed income markets, because of the stress in the banking sector and expectations of further rate increases. This contributed to heightened volatility and low liquidity, with both corporate and sovereign bonds remaining mostly flat in the first half of 2023. Credit risk indicators showed mixed signals, with early signs of deterioration such as increasing corporate high-yield bond defaults and sovereign bond downgrades, but on the other hand limited movements on sovereign credit spreads. Short selling related to EU banks remained contained. The EU's new Market Correction Mechanism for curbing excessive natural gas prices has been implemented, albeit, has not been triggered for now because of falling prices.*

Asset management: *The fund sector partly recovered after the historical decline of 2022, primarily owing to valuation effects. With assets under management of 18 trillion euros it remains 1.4 trillion* *euros below its end-2021 level. Performance has turned positive again for equity and bond funds. Flows into equity funds were reduced, while bond funds received inflows, which contrasts with the outflows in 2022. In particular, fixed income funds, which reduced their maturity and interest rate sensitivity during the monetary tightening, are now poised to benefit from higher yields. Fund risks remain high, as a result of prevailing credit, valuation, liquidity and interest rate risks, especially for funds combining several vulnerabilities such as in the real estate fund sector.*

Consumers: *The sentiment remained negative amidst prolonged uncertainty and weak expectations on long-term developments. The performance of retail investments remained subdued, reflecting sustained price pressures in the underlying asset markets. Although annual inflation in the EU has declined, it still represents a significant drag on real investment returns. High levels of consumer complaints persisted for contracts for differences (CFDs).*

Infrastructures and services: *The market stress experienced by banks in March resulted in an increase in circuit breaker events that affect financial shares and, renewed growth in equity trading volumes in the first quarter of 2023. CRAs issued more than 14,000 new EEA ratings in the first half of 2023. After peaking in the second half of 2022, central counterparty margins relating to commodity products decreased in the first half of 2023, in line with the drop in energy derivative prices.*

Market-based finance: *The ability of non-financial firms to raise funds through capital markets slightly picked up in the first half of 2023 from the lows observed in 2022. Equity transactions were mostly flat and issuance was mostly driven by secondary offerings. Corporate bond issuance peaked in the first quarter of 2023, with concentration in shorter term maturities, mainly linked to monetary policy expectations.*

Sustainable finance: *The EU market for ESG products and sustainable investments continued to grow at a robust pace despite a slowdown in ESG bond issuance in the first half of 2023, and demand for funds with a sustainable investment objective remained strong, while the wave of fund reclassifications from SFDR Article 9 to Article 8 had no clear impact on fund flows.*

Crypto-assets and financial innovation: *Crypto-asset valuations rebounded in the first half of 2023 to 1.2 trillion euros amidst receding trading volumes but remained far below their historical peak of 2.6 trillion euros. Persistently increased cyber risks remain an important source of concern for the EU financial sector. Financial markets have started exploring potential implications of Artificial Intelligence after the launches of various Generative AI tools in the first half of 2023. Their effect could be transformational, and authorities are examining the potential benefits and risks to consumers and financial stability*

- ***ESMA Report on Trends, Risk and Vulnerabilities (TRV) Report No.1, 2024***

Market environment

The markets that fall under ESMA's remit remained remarkably resilient in the second half of 2023, despite the confluence of risks that prevailed throughout the year. The sharp change in the interest-rate environment affected financial stability and investor outcomes in the second half of 2023. The confluence of external risks continues to weigh on the economic and market environment. There is increased concern about real estate valuations, as commercial and residential real estate have been hit particularly hard by recent interest-rate developments. Greenwashing and related malpractices risk undermining the credibility of green finance. Investors, especially those belonging to vulnerable groups because of limited knowledge or resources, are at risk of receiving false or misleading information through social media. Overall, risks remain at high or very high levels.

Risk Assessment

Risk levels are expected to gradually improve and their outlook is expected to remain possible or improved, based on the current relatively calm market conditions. The changes from the TRV for the second half of 2023 concern liquidity risk, which falls from very high to high levels, market risk, the outlook of which turned downward from stable in the previous semester, and environmental risk, the outlook of which turned stable from upward.

Going forward, markets are estimated to remain very sensitive, especially to the market impact of persistently higher interest rates, the macro-financial outlook, and geopolitical and peripheral risks. There is a high risk of corrections in a context of fragile market liquidity in the equity, bond, and crypto markets, with particular concern for exposure to real estate. Inflation is down, albeit continues to weigh on the investors' real returns. Developments imply that further major changes, related to artificial intelligence are to be expected in the financial sector.

Key Risk Drivers:

- ***Higher interest rates for longer:*** *The abrupt change in the interest-rate environment is affecting financial stability and investor outcomes. Financing costs spiked and are expected to impose a high burden on companies with debt maturing in 2024 and 2025. Credit Rating Agencies have already proceeded to the first downgrades. The deterioration of credit quality is ultimately expected to have an impact on investor portfolio performance.*
- ***Geopolitical and peripheral risks:*** *The confluence of external risks continues to weigh on the economic and market environment. As uncertainty and fragile liquidity are reducing the resilience of the financial system, external shocks should be expected to lead to increased security price instability/volatility.*

- ***Real-estate valuations:*** *Commercial and residential real estate have been hit particularly hard by recent interest-rate developments. The downturn is transmitted into financial markets and investors through lower equity and debt pricing of real-estate firms, rating downgrades, declining real-estate fund valuations and liquidity risks. Derivatives and repo exposures are limited but concentrated.*
- ***Greenwashing:*** *Greenwashing and related malpractices are undermining the credibility of green finance. With the first outflows from ESG funds in 2023, future incidences, unless prevented effectively, may undermine investor confidence.*
- ***Social media driven investments:*** *Investors, especially those belonging to vulnerable groups because of limited knowledge or resources, are at risk of receiving false or misleading information through social media. As finance-related online postings expand, investors not verifying the reliability and quality of information may incur losses.*

- ***ESMA Annual Statistical Report on the cost and performance of retail investment products in the EU***

Overall assessment

- *In the EU, investors are faced with an environment of high economic uncertainty, high inflation and relatively low market performance. The high cost of certain investment products, particularly for retail investors, raises concerns about actual investment outcomes. In this context, the availability of well-designed and cost-efficient products is a key element for encouraging increased consumer participation in European capital markets.*

Detailed findings

- ***Costs:*** *Costs have somewhat declined , but investors should continue to carefully consider the fees imposed by fund managers in their investment decisions. Active UCITS remained more expensive than passive funds and ETFs, so that their net performance was, on average, lower in comparison. Costs were higher for cross-border funds than those for domestic funds, mainly due to differences in distribution channels.*

- ***Investment value and value-for-money:*** *Investors paid approximately 3,000 euros in costs for an investment of 10,000 euros over the ten-years between 2012 and 2021. This led to a final net value of 18,500 euros at the end of this period. Apart from performance and costs, the overall utility that investors can derive from investment products, i.e. their value-for-money, is gaining growing attention. Cost efficiency, as well as product design and quality, determine final investor outcomes.*

- ***Inflation:*** *After more than a decade of low inflation, the recent rise in price levels has started to weigh on investor returns. In addition to the average 3,000 euro fund fees paid for a ten-*

year 10,000 euro investment, investors typically lose 2,000 euros because of inflation, reducing the net value of that investment to 16,500 euros. Inflation differences across member states, measured at the level of the fund's domicile, compound the persistent and high differences in fund costs across the EU.

- ***ESG:*** *While equity, bond and mixed ESG funds outperformed on average their non-ESG equivalents in 2021, results vary across asset classes. In 2021, equity and mixed ESG funds outperformed their non-ESG equivalents, but the performance of ESG bond funds was lower than that of non-ESG bond funds. ESG funds remained cheaper than their non-ESG peers, with the exception of equity ESG ETFs, which are more expensive compared to non-ESG equity ETFs.*

- ***Structured Retail Products:*** *Total costs were largely attributed to entry costs and varied substantially by country and by type of payoff. The cost of products issued in 2021 increased for a majority of payoff types and issuers as compared to products issued in the previous three years*

For more detailed information see the following link:
https://www.esma.europa.eu/sites/default/files/2023-01/esma50-165-2357-esma_statistical_report_on_costs_and_performance_of_eu_retail_investment_products.pdf

- ***ESMA Report on EU Credit Ratings Market 2023***

With this edition, the European Securities and Markets Authority presents its first market report on EU credit rating markets.

In 2008, G20 leaders identified credit ratings as a source of financial stability risks and made commitments to strengthen the regulation of credit rating agencies. In the EU, the Credit Ratings Agencies Regulation (CRAR) was subsequently adopted to reduce over-reliance on credit ratings, to improve the quality of ratings of the member states' sovereign debt of , to enhance credit rating agency (CRA) accountability, to reduce conflicts of interest of credit rating agencies related to the "issuer-pays" business model, and to increase the transparency of credit ratings by requiring their publication on a European Rating Platform. Further amendments were later made to CRAR, first in 2011, to take into account the creation of the European Securities and Markets Authority (ESMA) as the supervisor of CRAs registered in the EU, and then in 2013, to reinforce the rules and address any weaknesses related to sovereign debt credit ratings.

CRAR includes provisions for CRAs to report their credit rating actions. As a result, ESMA has built up an extensive dataset on credit ratings and related actions. In addition to facilitating market transparency and the monitoring of CRAs, this provides a rich dataset on the state of credit rating markets in the EU and on the extent of and the trends in credit risk. The latter supports ESMA's *supervisory and risk assessment activities, including on financial stability and other areas, and specifically informs the bi-annual ESMA Report on Trends, Risks and Vulnerabilities.*

This report contains four sections. First, it presents a summary of the essential market statistics. Second, it provides a short overview of the market structure and trends in credit rating markets. Third, it presents some of the main credit risk trends among EEA30 debt issuers, as reflected in credit ratings by building on the indicators developed for risk monitoring. Fourth, the statistical methods section provides further details on the data and steps taken for the preparation of the data and the statistics presented in the report.

Finally, the chapter on credit ratings market statistics presents an extensive collection of the indicators and metrics developed by ESMA for its risk assessment work. Importantly, the analysis presented here is separate from the supervisory work ESMA on individual CRAs. The indicators presented here also do not include statistics related to individual credit rating agencies.

- ***More than 140,000 European Economic Area (EEA) issuers and instruments rated by Credit Rating Agencies (CRAs)***

On 25.04.2023, ESMA published its report on the European Union (EU) Credit Ratings market, providing for the first time a comprehensive review of credit ratings reported to the EU.

ESMA finds that there were 823,400 credit ratings at the end of 2022. These ratings mostly concerned US issuers or US-issued debt (69%), with 17% (141,600 credit ratings) concerning EEA30 instruments and issuers. The main findings included in the report are the following:

***Size**: Out of 141,600 credit ratings for EEA30 instruments and issuers at the end of 2022, most were corporate ratings (79%), followed by sovereigns (12%) and structured finance ratings (9%)*

***Composition**: More than 90% of ratings for EEA debt and issuers had long-term horizons (a year or more), most are ratings of instruments (70%) rather than of issuers, and most were solicited by the debt issuer (73%). The largest three CRAs had issued most outstanding ratings (69%), including almost all of the ratings solicited by a debt issuer (92%).*

***Credit risk trends**: The COVID-19 pandemic was the major driver of events over the reporting period. In early 2020 there was a marked increase in credit rating downgrades across asset classes, particularly for non-financial firms and commercial mortgage-backed securities. These reflected the pressures facing certain business sectors because of the lockdowns and the associated economic uncertainty. In contrast, in late 2020 and in 2021 there was an improvement of credit risk indicators across asset classes, as government business support measures were introduced and took effect. In 2022, there were also negative effects because of the Russian invasion of Ukraine and the* *tightening of monetary policy, though impacts here were much less pronounced and widespread than those of the pandemic.*

This report is based on data collected under the Credit Rating Agency Regulation (CRAR) and provides a complete overview of credit rating markets in the EU, as well as risk indicators and metrics for the ongoing monitoring of risk related to credit ratings. It is important to note that the analysis presented in the report is separate from the supervisory work ESMA conducts on CRAs and does not present indicators at an individual CRA level.

For the full Report see the following link: https://www.esma.europa.eu/sites/default/files/2023-04/ESMA50-165-2477_EU_Credit_Ratings_market_2023.pdf

- ***ESMA Data Strategy 2023-2028***

This document supplements the ESMA Strategy 2023-2028 by elaborating on how the data kept in ESMA's data bases will be mobilised to best serve and help deliver on its strategic and thematic objectives in the period 2023-2028.

In the next five years, ESMA shall work towards facilitating the use of new data-related technologies, reducing compliance cost as regards data reporting by regulated entities, enabling the effective use of data at both the EU and national level, and make data more widely available to the public.

ESMA Data Strategy 2023-2028 first lays out the internal and external motivations for this report, which serve as a baseline for subsequently articulating ESMA's vision and objectives regarding data management. It then provides details on how ESMA intends to scale up its data capabilities to ensure the successful delivery of the listed projects and tasks within the proposed timeline, and to achieve its strategic objectives:

- *enhance the role of ESMA as a data hub, focusing on improved data, information, accessibility, interoperability and usability, along with data harmonisation and standardisation;*
- *contribute to the provision of relevant, useful and understandable information to the market, in machine-readable form, and facilitate its use, including by retail investors;*
- *enable cutting-edge, smart and effective data-driven supervision;*
- *achieve thought leadership and collaboration on data standards, technologies, and reporting innovations;*
- *promote efficiency, transparency, and cooperation in data policy, and reduce reporting burdens; and*

- *systematically use data for evidence-based policy development, supervision and risk assessment.*

Next steps

ESMA has already started scaling up its data capabilities and implementing some of the first planned deliverables, and it will continue to do so. This document, and in particular the implementation plan section, is meant to be revisited over time, as new legislative, technological or any relevant developments emerge that need to be addressed in a way that would require adjustments to the ESMA Data Strategy 2023-2028.

For more information, see: https://www.esma.europa.eu/press-news/esma-news/esma-launches-data-strategy-next-five-years

- ***ESMA seeks input on the proposed rules for service providers in crypto markets***

The European Securities and Markets Authority (ESMA), the EU's financial markets regulator and supervisor, published its first consultation package under the Markets in Crypto-Assets Regulation (MiCA) and invites comments from stakeholders by 20 September 2023.

In this first out of three consultation packages, ESMA is seeking input on proposed rules for crypto-asset service providers (CASPs), in particular related to their authorisation, identification and management of conflicts of interests and also how CASPs should address complaints.

Moreover, ESMA aims at gathering more feedback on the respondents' current and planned activities, as a fact-finding exercise to better understand the EU crypto-asset markets and their future development. These questions pertain to elements such as the expected turnover of the respondents, the number of white papers they plan to publish, and the use of on-chain vs off-chain trading. Any input received as part of this consultation will remain confidential and will serve to calibrate certain proposals to be inserted in the second and third consultation packages.

Verena Ross, chair of ESMA, commented that:

> *"This first consultation package is an important milestone for ESMA in the implementation of the MiCA framework. It translates our ambition to set high regulatory standards in the EU for crypto-asset related activities into concrete requirements. We are determined to ensure entities involved in crypto-asset related activities understand that the EU is not a place for forum-shopping. We also want to remind consumers that, even with the implementation of MiCA, there will be no such thing as a safe crypto-asset."*

In parallel to this consultation, ESMA will continue working on its remaining mandates with the aim of publishing a second consultation package in October 2023. More information regarding ESMA's approach to MiCA implementing measures can be found here.

- ***ESMA Report on EU Derivatives Markets 2023***

ESMA recently published its Report on EU Derivatives Markets for 2023, which is the fifth edition and presents a review of derivatives markets in the EU, based on the data reported in accordance with the provisions of EMIR.

Key findings

The EU derivatives market grew by 29% in two years, with outstanding notional amounts reaching almost 314 trillion euros by the end of 2022.

• Growth resulted in part from intragroup notional amounts, which increased substantially, by 91%, in two years.

• There was little change in the relative shares of asset classes. Interest rate derivatives (IRDs) represented 78% of the notional amount, currency derivatives 14%, while equity, credit and commodity derivatives accounted for 5%, 2% and 1% respectively.

• As regards counterparties, there was a shift away from non-banks to banks (62%, up 7 percentage points), with credit institutions and investment firms continuing to hold the largest portion of the notional amount.

• To a great extent as the result of continued trading in UK trading venues that are no longer recognised as equivalent, the share of derivatives exchanged on trading venues fell to 16%, reduced by 8 percentage points in two years.

• The shares of derivatives that were cleared continued to grow, from 71% to 77% for interest rate derivatives and from 41% to 45% for credit derivatives in 2021 and 2022.

For the full Report see the following link: EU Derivatives Markets 2023

- ***ESMA Report on the Evolution of EEA share market structure since MiFID II***

This ESMA report is about the transformation of the European share market structure since the implementation of MiFID II, with particular emphasis on the impact of the exit of the United Kingdom from the EU, given its great influence in share markets.

Since the launch of the EU capital markets union initiative, new legislative and non-legislative proposals have aimed at fostering a single market for capital in the EU. These regulatory proposals, *together with other external events including mergers, have shaped the integration and competition level of trading venues. Making use of regulatory data, this article presents the evolution of the European share market structure (in the EEA) from 2019 to 2022, with a specific focus on the impact of the UK's withdrawal from the EU, given its pivotal role in equity markets. The substantial decrease in trading volumes observed after 2021 was accompanied by four main changes: (a) a decrease in the number of infrastructures trading shares, even though is remains high; (b) a new distribution of trading, both by market type and by country, with a concentration of trading in a few EU countries; (c) the relocation of domestic trading for many European countries; and (d) the increased specialisation of trading venues. Confirming the transfer of trading volumes in a few countries, share trading remains highly concentrated on a few trading venues following the UK's withdrawal.*

The main changes in the structure and dynamics of the market are the following:

- *A significant drop in trading volumes, given that many EEA shares were mainly traded in the United Kingdom (down by -46%, from 25.0 trillion euros in the EEA plus the United Kingdom to 13.5 trillion euros only in the EEA). There was also a decrease in the number of infrastructures trading shares, even though it remains high.*

- *A redistribution of trading, both by market type and by country, the changes, inter alia, being a higher share of on-exchange trading, the concentration of trading within a few countries, and the reduction of share trading outside the EEA.*

- *Relocation of domestic trading: Before the Uk's withdrawal, only 41% of the volumes of the shares issued in an EEA country were traded on trading venues or systematic internalisers of the same country, a percentage that increased to 61% after 2021.*

- *Increase in the specialisation of trading venues, with MTFs specialising even more in dark trading, SMEs and foreign trading, and regulated markets specialising in domestic and large capitalization shares.*

For the full Report see the following link: [Evolution of the share market structure since MiFID II-TRV article]

- ***World Federation of Exchanges - Review of crypto-trading infrastructure***

All over the world, there are currently more than 500 crypto-currency trading platforms, many of which also facilitate the trading of other crypto-assets and offer related services. The rapid development of these platforms and the technological innovations they rely on, the lack of regulatory framework governing their authorisation and transparency, and the volatile nature of crypto-currencies have given rise to questions and concerns about the quality and stability of these markets and the potential implications for mainstream finance. Regulators are closely considering *how these markets should be regulated so that innovation is not constrained and investors are protected.*

As part of its mission to ensure that technology is an beneficial, effective, and powerful force in the financial markets, the WFE is conducting a two-part research project to improve our understanding of the crypto market infrastructures and contribute to the discussion around the benefits and risks they entail. This report, which is the first part of this projects, presents the results of a survey that the WFE conducted among its members and affiliates in 2022. The report offers a snapshot of the evolution of crypto-trading platforms across different jurisdictions and records the exchanges' stance in regard with these developments and their views on the future opportunities or challenges that these new technologies bring. It also provides an overview of the setup and operation of crypto-trading platforms, contrasting the models of centralised platforms (CEXs) with those of decentralised platforms (DEXs). It studies the implications that the differences in model design between DEX and CEX have on liquidity provision, price discovery and the custody of assets. And it reviews the academic literature findings about the market microstructure of these platforms. In addition, it discusses what these differences may imply in terms of three fundamental aspects of financial market regulation: anti-money laundering; prudential regulation and financial stability; and investor protection.

***Key findings**:*

- Approximately 60% of crypto-currency trading platforms use Central Limit Order Books (CLOBs), similar to those used by regulated exchanges, to facilitate crypto-asset trading. To fully benefit from the efficiency and transparency of CLOBs (e.g., instant order matching, handling of a large number of orders), CLOBs are kept on a centralised server and off the blockchain.

- Almost 40% of the crypto-currency trading platforms are decentralised and most of them implement Distributed Ledger Technology (DLT)-based Automated Market Making (AMM) protocols to set prices. These platforms only allow access from self-custodial wallets, offering anonymity to their users

- *In the survey, twelve regulated exchanges reported offering crypto-related products and services, such as trading in tokens and stablecoins, in response to increasing demand from customers, especially retail investors.*
- *According to the responses to the survey , retail demand for crypto-related products and services is generally more pronounced than institutional demand, except for custody services, where institutional demand is higher. This result suggests that, at least at the time of the survey, retail customers were less aware of the lack of investor protection surrounding many cryptoplatforms.*
- *The respondents to the survey see the crypto market as an opportunity for technology development and for expanding the investors' choices. At the same time, they raise concerns*

about the lack of uniform regulatory standards, volatile market conditions, and potential cybersecurity threats.

- *In contrast with regulated exchanges which are authorised to offer crypto-assets and services, crypto-trading platforms currently implement much less stringent KYC (Know-Your-Customer) measures. For CEXs, this seems mainly a consequence of lack of regulation and enforcement. In the case of DEX, unless here is an identifiable node or group of nodes exercising some control over the network, there is less clarity about how KYC procedures could be effectively implemented.*

- *The academic literature shows that CEXs enjoy higher liquidity than DEXs, in most cases. That said, DEXs may reduce the trading cost of large orders. The literature has also uncovered arbitrage opportunities arising from price discrepancies among crypto-currency pairs on different trading platforms, pointing to potential inefficiency issues in the crypto-currency market.*

For more information, see, the WFE report https://www.world-exchanges.org/storage/app/media/Crypto%20Infrastructure%20Review.pdf

More relevant publications of the WFE:

- *Blockchain Mining Power and Market Quality In Cryptocurrency Trading https://www.world-exchanges.org/storage/app/media/FINAL%20Sound%20Marketplaces%20DeFiCeFi%20Crypto%20For%20publication.pdf*

- *Promoting Sound Marketplaces – DeFi/CeFi, Crypto Platforms & Exchanges https://www.world-exchanges.org/storage/app/media/Crypto%20Mining%20and%20Market%20Quality.pdf*

- ***Tokenisation***

The tokenisation of an asset is the process of issuing a digital representation of it on a distributed ledger. The information incorporated in digital form includes items such as asset claims, ownership details, valuation, the applicable legislative framework, and settlement requirements. The tokens can be representations of traditional tangible assets (such as real estate, agricultural or mining commodities, analog artworks), financial assets (equities, bonds), or non-tangible assets (digital art and other intellectual property). These assets may have a parallel representation in other systems of record (e.g. "off-chain" in a central securities depository) or be native to the system ("on-chain").

Tokenization gives asset holders and, in general, market participants access to the potential benefits of Distributed Ledger Technology (DLT). Broadly speaking, these include non-stop (24/7) *operations, data availability, and almost instantaneous settlement. Moreover, tokenization offers automation capability —that is, the ability to embed code in the token, and the ability of the use the token upon the activation of smart contracts.*

The benefits include improved capital efficiency (minimization of settlement times), easier access (increased liquidity), operational cost savings, enhanced compliance, auditability, and transparency, as well as cheaper and more nimble infrastructure. However, some of these benefits remain theoretical in nature because of the lack of scale of tokenized assets and use cases.

The reasons why digital-asset tokenization hasn't achieved widespread adoption to date include technology and infrastructure unpreparedness, high implementation costs, market immaturity (fragmented provision of tokenization services), regulatory uncertainty, and lack of alignment regarding the industry's transformation.

Despite the challenges, tokenization may have reached an inflection point for certain use cases and asset classes. Conditions are maturing to accelerate the adoption of the said process: there are advances in cash tokenization (CBDCs, stablecoins), initiatives are being taken for adopting a new legislative framework, and firms are gradually being prepared to expand their capabilities to provide relevant services.

Also, see the following papers:

- *McKinsey & Company, Tokenization: A digital-asset déjà-vu, August 2023 (https://www.mckinsey.com/industries/financial-services/our-insights/tokenization-a-digital-asset-deja-vu?stcr=4A69BFA921034C958E89BE86A387F6E6&cid=other-eml-alt-mip-mck&hlkid=3da3109b4e8141afa5fc270500749c37&hctky=11245687&hdpid=4faed836-b468-4ec7-a2df-ee65ff7f349d#/)*
- *ISLA, Digital Assets in Technology: Asset by Asset, Commercial Opportunities & Practical Considerations for Tokenisation for the Securities Financing Market, April 2023,(https://www.islaemea.org/thought-leadership/tokenisation-for-securities-financing/)*
- *BIS Bulletin No 72, The tokenization continuum, April 2023, (https://www.bis.org/publ/bisbull72.htm)*

- ***The UN Climate Change Conference – COP28 (as seen by the foreign press)***

***COP28 ends with deal on transition away from fossil fuels**, article, Carbon Brief, 13 December 2023 "For the first time ever, COP28 ended with a deal to transition the world away from fossil fuels," Bloomberg reports. It says the United Arab Emirates (UAE) president Sultan Al Jaber arrived at a deal "strong enough for the US and EU on the need to dramatically curb fossil fuel use while keeping Saudi Arabia and other oil producers on board." It notes that Al Jaber brought the gavel down on the so-called "global stocktake" text on Wednesday morning – a day later than when COP28 was* *scheduled to conclude – and was greeted by applause and cheers by delegates. The draft text of the global stocktake deal, which was published early this morning, "calls on parties to contribute to the following global efforts", including "transitioning away from fossil fuels in energy systems in a just, orderly and equitable manner, accelerating action in this critical decade, so as to achieve net-zero by 2050," Le Monde reports. https://www.carbonbrief.org/daily-brief/cop28-ends-with-deal-on-transition-awayfrom-fossil-fuels/*

- ***UAE Consensus' Marks "Beginning of the End" for Fossil Fuels,*** *article, ESG Investor, 13 December 2023. A final text has been agreed at COP28 in response to the Global Stocktake which refers for the first time to ending use of fossil fuels, a day after the conference was due to close. The agreement, dubbed the 'UAE consensus' by COP28 President Sultan Al Jaber, calls on parties to the Paris agreement to begin "transitioning away from fossil fuels in energy systems, in a just, orderly and equitable manner, accelerating action in this critical decade, so as to achieve net zero by 2050 in keeping with the science." However, the approved text did not include precise wording to "phase out fossil fuels." A revised text was approved quickly this morning, after the most recent version was heavily criticised by industrialised nations and small island states for not going far enough in its calls for reducing the global economy's reliance on fossil fuels. https://www.esginvestor.net/live/*

- ***Developments in Capital Markets***

In 2023, international capital markets –especially in the EU– remained exceptionally resilient, despite the confluence of risks throughout the year, risks that remained at high or very high levels and caused a slowdown in the economic, as well as market environment. In the first half of 2023, financial markets recovered, owing to lower energy prices and to the expectations of a slower pace of monetary tightening. However, the collapse of many regional banks in the US rekindled concerns about the banking sector and caused a brief episode of instability. Markets remained very sensitive, particularly to possible deteriorations of economic fundamentals or financial institution risks, while closely monitoring the sustainability of public and private debt in the context of an environment of persistently high interest rates, macroeconomic prospects, and increased geopolitical and regional risks. There is a high risk of corrections –in a context of fragile market liquidity– in the equity, bond, and crypto markets, with particular concern focused on exposure, mainly to real estate Instability and inflation also increase medium-term risks for consumers, especially in regard to losses from negative real returns.

Financial stability risks remained high amidst this climate of intense geopolitical instability, continued concerns about the climate threat, revision of inflationary expectations and persistently high interest rates, as central banks continued to purse strict monetary policies, which, in turn give rise to increased recessionary risks. In this environment, financial conditions deteriorated, along with increased market volatility and marked uncertainty as regards liquidity levels. That said, investor interest for sustainable financing (ESG) products remained strong, while concerns about developments in the cryptocurrency *universe were intensified. Finally, energy prices remain unpredictable, because of continuing geopolitical tensions.*

The macro-financial environment deteriorated, amidst the persistence of strict financing conditions. At the global level, the IMF confirmed the negative outlook of the macroeconomic environment, with an expected slowdown of real global GDP growth from 3 % in 2023 to 2.9 % in 2024. Moreover, the European Commission revised down its estimates regarding growth in the EU to 0.5% for 2023 and to 0.9% for 2024.

Refinancing costs spiked and are expected to impose a high burden on companies with debt maturing in 2024 and 2025. It is telling that the first downgrades by credit rating agencies have already occurred. The deterioration of credit quality is expected to have an impact on investor portfolio returns. As uncertainty and fragile liquidity are reducing the resilience of the financial system, external shocks are expected to lead to increased price volatility.

Although inflation in the EU fell from the highs of October 2022 to 3.4% in December 2023, the European Commission estimates that it will reach 6.3% in 2023, nd will be further reduced to 3% in 2024. That said, inflation levels differ significantly across member-states and from month to month in 2023. Since the beginning of 2023 and throughout the entire year, central banks –such as the European Central Bank (ECB), the US Federal Reserve, and the Bank of England– showed their clear intention to continue pursuing strict monetary policies, and to contain the rise of interest rates in October 2023. The US Federal Reserve kept its base rates between 5.25% and 5.50% (the highest level since 2001), following eleven (11) consecutive interest rate hikes. In this environment, the ECB stopped at ten (10) consecutive interest rate hikes in October 2023, with the base rate remaining at 4.5% (increased by 0.26 basis points from July 2023). The ECB estimates that its Asset Purchase Programme (APP) will keep on being reduced, while the Pandemic Emergency Purchase Programme will keep on being reinvested in 2024.

International financial conditions reflect the tight monetary conditions of the past two years, with higher average lending rates and restrictive credit standards implemented on both business loans and mortgage loans in Europe. All reports by international and European organisations identify the impact of interest rate increases, which feeds back in equity and bond markets and leads to the readjustment (repricing) of debt servicing costs, as the main risk driver for the current capital market environment.

The low levels of volatility observed, combined with its steady trend, imply that these developments were rather expected. Although banks benefited from the higher interest rates through their increased net interest income, as well through increased market valuations, there is concern about the sustainability of their profits, as a result of reduced lending volumes, as well as concern about the sensitivity of banking asset quality to increased interest rates (se consumer credit exposure or exposure to real estate). In view of rising interest rates and concerns about corporate profitability led to a reduction of corporate bond spreads, even in the case of high-yield companies, implying an underestimation of risks.

In general, sovereign debt levels in EU member states are decreasing. Throughout EU, the gross public debt to GDP ratio fell to 82.6 % in the third quarter of 2023 from 84.6% in the same quarter of 2022. The yields of ten-year sovereign bonds fell in December 2023, mainly because of expectations for a monetary policy change in 2024. However, the persistence of high interest rates, the weak growth prospects in the EU, and the differing fiscal positions of the member states continue to cause concern about the sustainability of the debt.

Fixed income markets were marked by a substantial decline in the yields of government and corporate bonds in December 2023. Overall, European sovereign bond yields fell in the second half of 2023, a development related to the prospects of a high interest rate environment, where high rates are expected to persist for a prolonged period, and to the uncertainty surrounding the future decisions of central banks. Moreover, domestic political developments affected interest rate trends in the second half of 2023, with Belgium seeing the greatest drop in its government bond yields over this period (-46 bps), followed by France (-45 bps) and Spain (-44 bps). In contrast, bond yields increased in the US (+5 basis points) to 3.8%, despite the decline observed in December 2023, after having risen to almost 5% in October 2023, amidst fiscal concerns and expectations for the future evolution of interest rates.

Credit risk indicators showed mixed signals, with early signs of deterioration such as increasing corporate high-yield bond defaults and sovereign bond downgrades, but on the other hand limited movements on sovereign credit spreads. The credit quality of high-yield non-financial corporate bonds continued to deteriorate, especially in regard to real estate, with default rates rising.

The total number of bonds listed in international exchanges, according to WFE data for the year 2022, stood at 284,577 bonds, as compared to 277,607 in the previous year. At the end of 2023, the markets of Europe, Africa and the Middle East accounted for the largest portion of this market (70%), while in stock exchange terms, the largest number of listed bonds was recorded in the Euronext exchange (55,098), the Luxembourg stock exchange (38,899), and the Deutsche Boerse (35,092).

Corporate bond issuance in the EU remained strong in the second half of 2023, with a total value of 768 billion euros, increased by 24% year-on-year. Trading on corporate bonds approached the 2021 peak (1.6 trillion euros). Almost half of the issues (56%), worth a total of 428 billion euros, concerned bonds with no credit rating. Of the total bonds that have been given credit ratings, preference for high-rated issues remained strong at 86% in 2023, amounting to 293 billion euros.

Equity valuations were moderately increased in the second half of 2023, driven by a price rally at the end of the year, related to expectations for interest rate cuts in 2024. Volatility remained at moderate levels, while bid-ask spreads were relatively increased, highlighting the restlessness prevailing in the market.

Market-based finance was similarly weak in stock markets, which featured high uncertainty levels. Generally, stock issuing activity in Europe was slightly increased at the end of the 2nd half of 2023, albeit remaining weak over the largest part of the year. The total amount of stock issues in the primary market in Europe during the second half of 2023, stood at 38 billion euros, increased by 10 % year-on-year.

The stock exchanges where the largest amounts of funds were raised through initial public offerings were the Shanghai Stock Exchange (26.95 billion US dollars), the Shenzhen Stock Exchange (20.87 billion US dollars) and the Nasdaq US exchange (10.66 billion US dollars). Europe/Africa/Middle East accounted for 19.91% of total capital raising through initial public offering, while Asia/Pacific and the Americas accounted for 65.08% and 15.1% respectively. The stock exchanges with the largest amounts of funds raised through stock issuance were the Shanghai Stock Exchange (84.58 billion US dollars), the Shenzhen Stock Exchange (61.30 billion US dollars). Europe/Africa/Middle East accounted for 31.16% of total funds raised, while Asia/Pacific and the Americas accounted for 55.06% and 13.8% respectively.

In terms of new listings of companies in a stock exchange through initial public offerings, which in total fell to 1,256 companies in 2023 from 1,468 in 2022, the largest number took place in the National Stock Exchange of India (178 companies), the Shenzhen Stock Exchange (133 companies) and the Shanghai Stock Exchange (103 companies).

As regards year-on-year changes, in 2023 the S&P 500 Volatility index fell by 42.55%, followed by the Euro Stoxx Volatility Index, which fell by 35.04%, both indices having registered y-o-y increases in 2022 and 2021.

Most individual stock market indices moved downwards until the end of 2023, contrary to the corresponding period of the previous year. More specifically, the following year-on-year changes were recorded in December 2023: The DAX index closed at 16,751.64 units, up by 20.31%; the FTSE 100 (LSE) index closed at 7,733.24, up by 3.78%; the FTSE MIB (Borsa Italiana) index closed at 30,351.62, up by 28.03%; the EURONEXT 100 index closed at 1,395.52, up by 13.31%; the AEX Amsterdam index closed at 786.82, up by 14.20%; the BEL 20 (Belgium) index closed at 3,707.77, marginally up by 0.18%; the PSI20 (Lisbon) index closed at 6396.48, up by 11.71%; the CAC40 (Paris) index closed at 7543.18, up by 16.52%; the IBEX35 closed at 10,102.10 up by 22.76%; the ATX index closed at 3,434.97, up by 9.87%; the OMXS30 Stockholm index closed at 2,395.07, up by 17.26%; and the ATHEX Composite Share Price Index closed at 1293.14 units, up by 39.53% year-on-year. Similarly, individual stock exchange indices in the US markets also suffered losses: the NYSE Composite Index closed at 16,852.90 units, up by 10.99%; the Dow Jones Industrial Average closed at 37,689.54, up by 13.70%; the S&P500 closed at 4769.83, up by 24.23%; and the NASDAQ Composite index closed at 15,011.35 units, up by 43.42%. Examples from Asian markets include the loss sustained by the Hang Seng Index, which closed at 17,047.39 units, down by -13.82%, the Shanghai Composite index, which closed at 2,974.93 units, down by -3.70%, the TOPIX index, which closed at 2366.39, up by 25.095%, and the BIST100 index, which closed at 7470.18, up by 35.60%. At the closing of 2023, international stock and bond indices registered the following year-on-year changes: FTSE EUROTOP 100 up by 13.227%, MSCI Emerging Markets up by 7.04%, and FTSE BRIC 50 down by -9.66%.

In 2023, the size of the global equity market was increased. According to data by the World Federation of Exchanges, the total market capitalisation of listed shares worldwide rose to 111.60 trillion US dollars at end December 2023 from 101.42 trillion US dollars at the end of the previous year (increased by 10.03%

year-on-year). By region, the Americas accounted for 48.5% of total market capitalisation worldwide, Asia/Pacific accounted for 30.55%, and the other countries accounted for 20.95%.

More specifically, total market capitalisation at the largest equity markets worldwide was as follows: New York Stock Exchange, 25.56 trillion US dollars (a y-o-y increase of 6.25%); Nasdaq, 23.41 trillion US dollars (a y-o-y increase of 44.20%); Shanghai, 6.52 trillion US dollars (a y-o-y decrease of -0.14%); the EURONEXT group 6.89 trillion US dollars (a y-o-y increase of 10.19%); Tokyo, 6.15 trillion US dollars (a y-o-y increase of 22.96%); and the London Stock Exchange group, 3.29 trillion US dollars (a y-o-y increase of 0.33%, based on August 2023 data).

In 2023, based on WFE data, worldwide trading activity on equities, as recorded in the orderbook, was marginally increase to almost 147.89 trillion US dollars from 144.49 trillion US dollars in the previous year. The stock exchanges with the largest trading values were those of New York (26.36 trillion US dollars, reduced by -12.28% y-o-y) and the NASDAQ (23.7 trillion US dollars, reduced by -12.96% year-on-year). As far as individual stock exchanges are concerned, at the end of 2023 there were year-on-year trading value changes in the Deutsche Boerse by -27.58%, the LSE Group by -22.52% (based on August 2023 data), the Euronext by -12.66%, the BME Spanish Exchanges by -12.98%, the Vienna Stock Exchange by -30.34%, the Nasdaq Nordic Exchanges by -19.17%, the Borsa Istanbul by +35.89%, the Japan Exchange Group by +8.11%, the Hong Kong Exchanges by -19.97%, and the Athens Stock Exchange by -27.58%.

Investment activity through participation in investment funds was increased. According to WFE data, in 2023 the number of investment funds under management rose to 18,667 from 18,394, up 1.48% year-on-year, while the total value of trading rose to 5.03 trillion US dollars from 3.2 trillion US dollars, increased by 56.74% year-on-year. The number of exchange traded funds (ETFs) stood at 10,701 at the end of the year (as compared with 10,084 in 2022), while the total value of trading stood at 31.43 trillion US dollars (as compared with 36.8 trillion US dollars).

The fund sector partly recovered after the historical decline of 2022, primarily due to decreased asset valuation. With assets under management of 18 trillion euros it remains 1.4 trillion euros below its end-2021 level. Performance has turned positive again for equity and bond funds. Flows into equity funds were reduced, while bond funds received inflows, which contrasts with the outflows in 2022. In particular, fixed income funds, which reduced their maturity and interest rate sensitivity during the monetary tightening, were in a position to benefit from higher yields. Fund risks remain high, as a result of prevailing credit, valuation, liquidity and interest rate risks, especially for funds combining several vulnerabilities such as real estate funds.

Both the performance and flows of EU funds were volatile in the second half of 2023. As regards flows, investors preferred fixed income funds to equity funds. Money market funds, in particular, attracted significant inflows, with higher returns and an inverted yield curve. In general, risks were stabilised, albeit remained high, especially liquidity risk and credit risk. Whereas investment funds handled the *market's transition to a higher-rate environment, there were still concerns regarding real estate fund asset valuations amidst a bear market.*

In the EU collective investment sector there was remarkable volatility in investment fund returns. Equity mutual fund returns rose from a 0.9% 12-month monthly average return in the first half of 2023, to 1.2% in the second half of 2023, with significant variance over the reporting period. In such a volatile environment, equity fund flows remained negative overall at -2% NAV. Similarly, the return on mutual funds that invest in mixed assets improved, amidst substantial volatility, from 0.3% to 0.7% in the second half of 2023, with total outflows of 3.7% NAV over the same period. In contrast, money market funds (MMFs) registered inflows of 9.6%, a two-year high. Most inflows concentrated in MMFs in US dollars and euros, which received inflows equivalent to 14% and 12% of their NAVs respectively. This increase coincided with the increase in MMF remuneration, now 0.3% higher on a monthly basis and in nominal terms compared to the first half of 2023. MMFs benefited in particular from the inverted yield curve (in euros, GBP and USD) that made their assets, the real maturity of which is less than 397 days, more remunerative than other fixed income assets. This argument also applies to the comparison of MMF remuneration with bank deposits, the interest rates of which increased more slowly. Bond funds continued to register positive inflows (0.6% NAV), albeit much lower than in the first half of 2023, hen they saw record-high inflows (3.2%). Their performance remained lower than that of equity funds, albeit less volatile, with a 12-month monthly average return of 0.5%. Finally, both the returns and flows of real estate funds remained flat compared to other fund classes. However, this may hide more fundamental concerns about asset valuations in the context of increasing downside risks.

As regards bilateral exchange rates, at the end of 2023 and on a year-on-year basis, the euro lost -1.97% and -5.90% of its value against the sterling and the Swiss franc respectively, whereas it gained 3.64% and 11.79% against the US dollar and the Japanese yen respectively. As regards international commodity prices, at the end of 2023 food decreased by 10.1% year-on-year, according to data by the Food and Agriculture Organization of the United Nations. In metals, the base metals international price index of the International Monetary Fund fell by 4.9%, while that of oil fell by 3.6%.

In the market for ESG investment products (based on environmental, social and governance factors), after many years of incessant growth, the absorption of ESG investments and the development of ESG-related investments showed signs of deceleration during 2023. Whereas strong investor demand for funds with sustainable investment targets had showed resilience to tough market conditions in 2020 and 2021, in 2022 and 2023 the combination of tight Central Bank monetary policies, weak economic prospects and increasing scrutiny of sustainability claims by investors, seems to affect the growth of the ESG market. With the first outflows from ESG funds during 2023, the threat of greenwashing, unless prevented effectively, may undermine investor confidence in these products.

However, the ESG bond market continued to grow, albeit more slowly, reaching a total value of 1.9 trillion euros in December 2023, increased by 21% y-o-y. Nevertheless, issue volumes were much lower, *with "green" bonds –which account for the largest part of the ESG bond market– suffering a 34% y-o-y drop in the second hlf of 2023, mainly as a result of reduced public sector issues.*

Crypto-asset valuations rebounded in the first half of 2023 and increased to 1.2 trillion euros from 770 billion euros at the end of 2022 amidst receding trading volumes but remained far below their historical peak of 2.6 trillion euros in November 2021. Persistently increased cyber risks remain an important source of concern for the EU financial sector. Financial markets have started exploring potential implications of Artificial Intelligence after the launches of various Generative AI tools in the first half of 2023. Their effect could be transformational, and authorities are examining the potential benefits and risks to consumers and financial stability

The Greek Capital Market

The course of the Greek capital market in 2023 was characterised by a) an increase of the total market capitalisation of ATHEX-listed shares, as compared to the previous year, and the increase in the performance of most indices of the Athens Exchange; b) a mixed picture as regards trading activity in the Securities Market (significantly increased trading activity in shares, reduced activity in bonds), with increased trading activity in the Derivatives Market and increased activity in the Alternative Market; c) the reduction in long-term Greek government bond yields (interest rates) and the increase in the value of trading in Greek Government bonds; and, finally, d) the net inflows to, and the significant increase in the total net assets of, mutual funds.

In the market for Greek Government bonds, the rise of yields during the past two years was discontinued. More specifically, the (average) yield of the ten-year benchmark bond stood at 3.28% in the end of 2023, as compared to 4.22% in December 2022.

Based on statistics from the System for Monitoring Transactions in Book-entry Securities of the Bank of Greece, the nominal value of secondary market trading on Greek Government bonds stood at 3,589.97 billion euros, an amount that is 36.80% higher than the corresponding amount for the previous year (2,624.33 billion euros). The average monthly nominal value of trading stood at 299.16 billion euros (218.69 billion euros in 2022). The value of transactions in the Electronic Secondary Government Bonds Market (HDAT) stood at 26.45 billion euros on an annual basis (20.93 billion euros in 2022).

In the primary market for long-term government debt there were seventeen issues and re-issues worth 15.34 billion euros (7.85 billion euros in 2022). As regards the issuance of Treasury bills, according to data from the Public Debt Management Agency, the total amount raised in 2023 stood at 23.59 billion euros (23.4 billion euros in 2022). The average weighted cost of new borrowing stood at 3.71% on 31.12.2023, markedly increased from 1.33% in 2022.

According to ATHEX data, the total market capitalisation of shares listed on the Securities Market stood at 87,514.31 million euros (also taking into account the shares in suspension of trading), significantly *increased by 32.88% year-on-year (65,861.95 million euros in 2022). The ratio of total market capitalisation to Greece's GDP was increased year-on-year (to 39.29% from 31.66% in 2022). The market capitalisation of shares listed for trading in the Alternative Market of the ATHEX stood at 450.37 million euros (280.05 million euros at the end of 2022).*

The ATHEX Composite Share Price Index closed at the year's end at 1293.14 units, from 929.79 units in 2022, registering a year-on-year gain of 39.08% The performance of all stock exchange indices, including sectoral indices, was positive. The largest year-on-year gains were registered by the FTSE/ATHEX Mid Cap Total Return index (63.17%) and the FTSE/ATHEX Mid Cap index (59.47%). On the sectoral indices' side, the largest year-on-year gains were registered by the FTSE/ATHEX Industries index (68.92%), the FTSE/ATHEX Financial Services index (66.29%) and the FTSE/ATHEX Banks index (65.73%). The average monthly volatility of the ATHEX Composite Share Price Index stood at 8.33% (9.23% in 2022) and that of the FTSE/ATHEX Index stood at 8.14% (8.84% in 2022).

Trading activity in the Securities Market of the Athens Exchange was significantly increased. More specifically, the value of equity trading stood at 28,696.66 million euros, increased by 59.97% year-on-year, while the value of trading in bonds stood at 219.80 million euros, reduced by -9.81% year-on-year. The average monthly value of equity trading stood at 2.39 billion euros, while the average monthly value of trading in bonds stood at 18.32 million euros. Finally, the value of equity trading in the Alternative Market of the ATHEX continued to increase, and stood at 134.08 million euros (100.95 million euros in 2022), while the value of trading in corporate bonds stood at 1.94 million euros (919,209 euros in 2022).

As regards liquidity, the (value-weighted) monthly average bid-ask spread stood at 1.98% in 2023 (2.25% in 2022). Moreover, the average monthly turnover velocity for Main Market stocks stood at 1.72% (1.16% in 2022), breaking the fall of the past three years.

The participation of foreign investors to the market capitalisation of the Athens Exchange was slightly increased year-on-year (to 64.37% from 63.61% in 2022), while the participation of domestic investors (including the Hellenic Financial Stability Fund – HFSF) was slightly reduced (to 35.63% from 36.39%). Similarly, the participation of the HFSF was slightly reduced (to 3.20% from 3.72% in 2022). Taking, however, into consideration the value of transactions, foreign investors were net sellers (the value of their sales exceeded the value of their purchases by 13.75 million euros), while domestic investors were net buyers.

In the derivatives market, trading activity was increased in 2023. while the number of accounts that performed trades was also increased. The average daily volume of trading in stock and index futures and options stood at 43,965 contracts (as compared to 34,351 contracts in 2022), increased by 27.99% year-on-year. The share of stock futures in the average daily volume of trading in all derivative products remained unchanged at 96.25%, while the corresponding share of index futures marginally fell to 3.30% from 3.38% in 2022.

The average monthly number of accounts that performed trades rose to 1,754 (1,586 in 2022), while the respective share on the total number of end investor-client accounts also rose to 5.33% (from 4.88% in 2022). The ratio of ATHEX-member to client transaction value for all the products traded in the derivatives market remained almost unchanged y-o-y at 46:54. The average monthly ratio of the value of transactions on futures on the FTSE/ATHEX Large Cap index to the total value of trading on the underlying equities stood at approximately 8.47% (7.60% in 2021), discontinuing the downward movement of the past three years, while the average monthly ratio of transactions on stock futures to the total value of trading in the underlying market was reduced to 14.06% (12.50% in 2021). Finally, the call:put ratio concerning trading in options stood at approximately 0.91 on an annual basis (1.05 in 2022).

In 2023, there were eight issues of stock, either by companies that already had securities admitted to trading or as initial public offerings with admission to trading in the Securities Market of the ATHEX. More specifically, there were four share capital increases through issuance of new shares by ATHEX-listed companies (as compared to eight in 2022), and four share capital increases with admission to trading for the first time in the Securities Market of the Athens Exchange aw compare to three in 2022. Total funds raised through these stock offerings amounted to 954.04 million euros (583.88 million euros in 2022). In addition, there were two corporate bond issues (four in 2022) by companies that already had securities admitted to trading in the Athens Exchange. The total amount of funds raised through corporate bond issues stood at 600 billion euros (530 billion euros in 2022).

As regards capital market intermediaries, at the end of 2023 forty seven (47) investment firms licensed by the HCMC were operating in the Greek capital market, the same number as in 2022, along with twenty-one Financial Intermediation Firms (FIFs), (twenty-two in 2022). Trading activity by Investment Firms in shares listed in the Athens Exchange retained the upward trend of the past few years, rising to 45.09 billion euros from 29.99 billion euros in 2022. The share of the five ATHEX members with the largest value of trading as a percentage of the total value of trading (all five of which are Investment Firms) stood at 69.03% (69.21% in 2022).

The total number of mutual fund management companies (MFMCs) fell to thirteen (fourteen in 2022). The total number of mutual funds under management rose to 402 at the end of the year (352 in 2022), of which 195 have been granted formation approval by the Hellenic Capital Market Commission. Finally, the five largest MFMCs had funds under management of 14.28 billion euros (9.84 billion euros in 2022), which accounted for 90.39% of total mutual fund assets.

The total net assets of mutual funds were substantially increased by 45.13% year-on-year and stood at approximately 15.80 billion euros, (10.88 billion euros at the end of 2022). More specifically, as regards year-on-year changes in the total net assets of individual mutual fund categories, increases were recorded in the bond (108.89%), equity (43.78%), balanced (15.57%), specialist (27.51%) and Variable NAV MMF (94.79%) categories, while a decrease was recorded in the funds of funds (-5.67%) category.

In 2023, mutual funds as a whole registered net inflows, which amounted to 3,183.72 billion euros (as compared to net inflows of 610.76 billion euros in 2022). As regards individual mutual fund categories, net inflows were registered by Variable net asset value (VNAV) MMFs (365.22 million euros), specialist funds (110.15 million euros), equity funds (108.28 million euros) and bond funds (3,009.88 million euros), while net outflows were registered by funds of funds (-321.58 million euros), and balanced funds (-88.23 million euros).

The annual returns of individual mutual fund categories were positive, and were as follows: bond mutual funds: 5.64%; equity mutual funds: 23.12%; balanced mutual funds: 16.20%; equity funds of funds: 8.38%; balanced funds of funds: 6.40%; bond funds of funds: 3.12%; MMFs: 2.24%; and finally, specialist mutual funds: 5.03%.

European and national regulatory framework

European regulatory framework

In 2023, the EU continued to implement its ambitious plan for the Capital Markets Union. Some of the most important institutional developments in regard to these issues are presented below.

Institutional developments in the context of the Digital Finance Strategy

In 2023, the European regulations included in the package of measures for the financial sector, presented by the European Commission in September 2020, came into force. The measures concerned the creation of a single regulatory framework for crypto-asset markets, digital operational resilience, and distributed ledger technologies. The regulations fill a major gap in European legislation, lifting the obstacles to the use of new digital financial instruments and ensuring at the same time that new technologies and products fall under the scope of financial regulation and the operational risk management provisions for undertakings operating in the EU. Thus, the aforementioned regulations aim at supporting innovation and the adoption of new financial technologies, providing at the same time the appropriate level of protection to consumers and investors.

On 16 January 2023, Regulation (EU) 2022/2554 on digital operational resilience for the financial sector ("Digital Operational Resilience Act", "DORA") came into force. The DORA Regulation constitutes the European regulatory framework on digital operational resilience, which aims to ensure the resilience of undertakings to all types of disruptions and threats related to new information and communication technologies (ICT), in order to prevent and mitigate cyber threats. DORA states that all "financial entities should follow the same approach and the same principle-based rules when addressing ICT risk, taking into account their size and overall risk profile, and the nature, scale and complexity of their services, activities and operations." The DORA Regulation shall apply from 17 January 2025. It should be noted that Directive (EU) 2022/2555 "on measures for a high common level of cybersecurity across the Union" (NISD 2) came into force on 16 January 2023. DORA and Directive (EU) 2022/2555 are supplemented by *the provisions of Directive (EU) 2022/2556 "amending Directives 2009/65/EC, 2009/138/EC, 2011/61/EU, 2013/36/EU, 2014/59/EU, 2014/65/EU, (EU) 2015/2366 and (EU) 2016/2341 as regards digital operational resilience for the financial sector" ("FinTech Amending Directive") and Directive (EU) 2022/2557 "on the resilience of critical entities."*

Regulation (EU) 2022/858 on a pilot regime for market infrastructures based on distributed ledger technology ("Distributed Ledger Technology Pilot Regime" or "DLT") came into force on 23 March 2023. The DLT Regulation defines DLT financial instruments as financial instruments, as set out in MiFID II, which are issued, recorded, transferred and stored using distributed ledger technology. Then the DLT Regulation introduces the following three types of DLT market infrastructure:

- *DLT multilateral trading facilities.*
- *DLT settlement systems, i.e. settlement systems that settle transactions in DLT financial instruments against payment or against delivery.*
- *DLT trading and settlement systems.*

The DLT Regulation regulates the authorisation and operation of DLT infrastructures and their operation, as regards:

i) granting and withdrawing specific permissions to operate DLT infrastructures, as well as specific exemptions from EU financial services legislation, including the directive and the regulation on markets in financial instruments (MiFID2/MiFIR) and the regulation on central securities depositories (CSDR);

ii) mandating, modifying and withdrawing compensatory or corrective measures;

iii) operating DLT market infrastructures;

iv) supervising DLT market infrastructures; and

v) cooperation between competent authorities and the European Securities and Markets Authority (ESMA).

Finally, the title of the DLT Regulation suggest that it will initially operate on a pilot, and in this sense limited, basis. Therefore, the DLT regulation imposes qualitative constraints on the financial Instruments that fall under its scope, i.e. equities, debt securities, shares in collective investment undertakings, and quantitative constraints on the value of financial instruments admitted to trading on, or registered with, a DLT market infrastructure.

On 9 June 2023, Regulation (EU) 2023/1114 on markets in crypto-assets (MiCAR) was published in the Official Journal of the European Union, and came into force on 29 June. MiCAR shall apply from 30 December 2024, excluding the provisions on stablecoins, which shall apply from 30 June 2024. This *means that a harmonised regulatory framework for crypto-assets and related services shall apply in the entire European Union by the end of 2024.*

MiCAR lays down uniform requirements for the offer to the public and admission to trading on a trading platform of digital representations of securities or options that are electronically transferred and stored, also known as crypto-assets. It also lays down a uniform regulatory framework as regards requirements for crypto-asset service providers and the prevention of market abuse for crypto-assets. MiCAR also regulates the following:

- *transparency and disclosure requirements for the issuance, offer to the public and admission of crypto-assets to trading on a trading platform for crypto-assets ('admission to trading');*

- *requirements for the authorisation and supervision of crypto-asset service providers, issuers of asset-referenced tokens and issuers of e-money tokens, as well as for their operation, organisation and governance;*

- *requirements for the protection of holders of crypto-assets in the issuance, offer to the public and admission to trading of crypto-assets;*

- *requirements for the protection of clients of crypto-asset service providers;*

- *measures to prevent insider dealing, unlawful disclosure of inside information and market manipulation related to crypto-assets, in order to ensure the integrity of markets in crypto-assets.*

It is worth noting that actors in the crypto-assets market will be required to disclose information on their environmental and climate footprint. The European Securities and Markets Authority (ESMA) will develop draft regulatory technical standards on the content, methodologies and presentation of information related to the main adverse environmental and climate-related impacts. Moreover, within two years, the European Commission will have to submit a report on the environmental impact of crypto-assets and the introduction of mandatory minimum sustainability standards for consensus mechanisms, including proof-of-work.

To avoid any overlaps with the updated anti-money laundering (AML) legislation, which will now also cover crypto-assets, MiCAR does not duplicate the anti-money laundering provisions. That said, MiCAR requires that the European Banking Authority (EBA) will be tasked with maintaining a public register of non-compliant crypto-asset service providers. Crypto-asset service providers (CASPs) the parent company of which is located in countries listed on the list of third countries considered at high risk for anti-money laundering activities, as well as on the list of non-cooperative jurisdictions for tax purposes, shall have to implement enhanced checks, in line with the EU anti-money laundering framework. Tougher requirements may also be applied to shareholders and to the management of CASPs, particularly with regard to their location.

As of 30 December, crypto-asset service providers in the European Union shall be required to obtain permission for the provision of services within the EU.

Other institutional developments

As regards institutional developments in the Capital Markets Union front, Regulation (EU) 2023/606 amending Regulation (EU) 2015/760 as regards the requirements pertaining to the investment policies and operating conditions of European long-term investment funds (ELTIFs) and the scope of eligible investment assets, the portfolio composition and diversification requirements and the borrowing of cash and other fund rules, was published in March 2023. The aim of the ELTIF institutional framework was to facilitate long-term investments, as in transport infrastructure or social infrastructure (e.g. energy, health etc.), as well as investments in small and medium-sized enterprises. Regulation (EU) 2023/606 applies since 10 January 2024, and allows ELTIFs to raise funds from professional and retail investors without the quantitative limits imposed by Regulation (EU) 2015/760. Moreover, it allows investment in a wider range of eligible investment assets, which now shall account for at least 55% of the ELTIFs capital, instead of 70% that had been laid down in 2015.

Regulation (EU) 2023/2859 establishing a European single access point ("European single access point", "ESAP") providing centralised access to publicly available information of relevance to financial services, capital markets and sustainability was published on 20 December 2023. The purpose of the new regulation is the creation and operation of a common European platform for the provision of financial as well as non-financial information, which is either disclosed on a mandatory basis, in accordance with existing European legislation, or provided on a voluntary basis by entities that choose to provide information in order to increase their visibility to potential investors. The creation of the ESAP platform was one of the main aims of the Capital Markets Union Action Plan, which had been adopted by the European Commission in September 2020. The new Regulation does not set new disclosure requirements, albeit covers the already existing as per 20 December 2023, information disclosure requirements that emanate from 19 Regulations and 16 DIrectives. The creation and operation of ESAP have been assigned to ESMA. The ESAP Regulation is supplemented by Directive (EU) 2023/2864 amending certain Directives as regards the establishment and functioning of the European single access point, and Directive (EU) 2023/2869 amending certain regulations as regards the establishment and functioning of the European single access point.

The revision of Regulation (EU) 909/2014 on central securities depositories (CSD) continued in 2023, and Regulation (EU) 2023/2845 amending Regulation (EU) No 909/2014 as regards settlement discipline, cross-border provision of services, supervisory cooperation, provision of banking-type ancillary services and requirements for third-country central securities depositories and amending Regulation (EU) No 236/2012, was published on 27 December. Regulation (EU) 2023/2845 applies since 16 January 2024 and aims at reducing the financial and regulatory burden of CSDs, and improving their ability to operate on a cross-border basis, enhancing at the same time financial stability.

Regulation (EU) 2023/2845 amends Regulation (EU) 909/2014 as regards the following key points:

- *Settlement discipline: According to the new Regulation, the European Commission can specify, by issuing an implementing act, the imposition of mandatory buy-ins in case of settlement failure as regards specific financial instruments or specific categories of transactions. The issuance of an implementing act should fulfill two conditions: First, the application of other measures, such as cash penalties or the suspension, by CSDs, CCPs or trading venues, of participants that cause settlement fails consistently and systematically, has not resulted in a long-term sustainable reduction of settlement fails or in maintaining a reduced level of settlement fails in the EU. Second, the level of settlement fails has or is likely to have a negative effect on the financial stability of the EU. In addition, the European Commission should consult with the European Systemic Risk Board (ESRB) and request ESMA to provide a cost-benefit analysis. ESMA may recommend that the Commission suspends in a proportionate way the buy-in mechanism where necessary to avoid or address a serious threat to financial stability or to the orderly functioning of financial markets. Finally, cash penalties shall not be imposed for settlement fails the underlying cause of which is not attributable to the participants or result from operations that are not considered as trading.*

- *Regulation (EU) 2023/2845 specifies the procedure concerning the provision of European passport to a CSD. More specifically, when a CSD wishes to provide notary and central maintenance services in relation to financial instruments constituted under the law of another EU Member State, must take into account both the law of the Member State where the issuer is established, and the corporate or similar law based on which the securities are issued. Member States should regularly update the list of the aforementioned provisions of national law and communicate it to ESMA.*

- *Third-country CSDs must notify ESMA in case they intend to offer settlement services in relation to financial instruments constituted under the law of a EU Member State. ESMA shall notify the competent authority of the Member State under the law of which the financial Instruments are constituted. ESMA shall develop draft regulatory technical standards to specify the information that the third-country CSD is to provide.*

- *Regulation 2023/2845 provides for the establishment of a college of supervisors when the competent authority of the home member state determines that the activities carried out by the CSD in at least two host member states are of substantial importance or when the competent authority of the home member state is notified by ESMA or the European Banking Authority (EBA) or the competent or relevant authorities that the activities carried out by the CSD in at least two host member states are of substantial importance.*

- *Finally, the new regulation amends the conditions for the CSDs access to banking services. CSDs can require the provision of banking-type ancillary services not only from credit institutions, but* *also from other CSDs that provide these services. Moreover, the regulation amended the provisions according to which CSDs can settle the cash payments through credit institutions or CSDs that do not provide banking-type ancillary services, provided that the total value of such cash settlement calculated over a one-year period, does not exceed the threshold determined in accordance with the regulatory technical standards developed by EBA in close cooperation with the members of the ESCB and ESMA.*

Legislative work for the amendment of the institutional framework that applies to EU central counterparties (CCPs) and the market participants that make use of their services continued during 2023. The changes aim at making the EU a more attractive clearing hub by enhancing the liquidity of EU CCPs and the supervisory framework.

In May 2023, the European Commission published a package of proposed measures for the protection and empowerment of investors in the EU ("Retail investment package"). The package consists of:

1. a proposal for an amending Directive, which revises the existing rules set out in the Markets in Financial Instruments Directive (MiFID II), the Insurance Distribution Directive (IDD), the Undertaking for Collective Investment in Transferable Securities (UCITS) Directive, the Alternative Investment Fund Managers Directive (AIFMD), and the taking-up and pursuit of the business of Insurance and Reinsurance Directive (Solvency II), as well as

2. a proposed amending Regulation, which revises the Packaged Retail and Insurance-based Investment Products (PRIIPs) Regulation

In 2023, the European Commission issued the following implementing regulations:

- *Commission Delegated Regulations (EU) 2023/314 and 2023/215 for the deferral to 30.06.2025 of the date of application of certain requirements as part of articles 5 and 11 of EMIR, concerning margin requirements for OTC derivative contracts and the obligation to clear OTC derivative contracts that are concluded between counterparties which are part of the same group.*

- *Commission Delegated Regulation (EU) 2023/1117 supplementing Directive (EU) 2019/2034 of the European Parliament and of the Council with regard to regulatory technical standards specifying requirements for the type and nature of the information to be exchanged by competent authorities of home and host member states.*

- *Commission Delegated Regulation (EU) 2023/1118 supplementing Directive (EU) 2019/2034 with regard to regulatory technical standards specifying the conditions under which colleges of supervisors exercise their tasks.*

- *Commission Implementing Regulation (EU) 2023/1119 laying down implementing technical standards for the application of Directive (EU) 2019/2034 with regard to standard forms,* *templates and procedures for the information sharing between the competent authorities of home and host member states.*

- *Commission Delegated Regulation (EU) 2023/1626 on amending the regulatory technical standards laid down in Delegated Regulation (EU) 2018/1229 ("settlement discipline regulation" "SDR") as regards the penalty mechanism for settlement fails relating to cleared transactions submitted by CCPs for settlement.*

In 2023, ESMA issued the following guidelines:

- *ESMA Guidelines on MiFID II product governance requirements (ESMA 35-43-3448, 27.03.2023).*
- *ESMA Guidelines on on certain aspects of the MiFID II suitability requirements (ESMA 35-43-3172, 03.04.2023).*
- *ESMA Guidelines on certain aspects of the MIFID II remuneration requirements (ESMA 35-43-3565, 03.04.2023).*
- *ESMA Guidelines on the consistent application of the triggers for the use of Early Intervention Measures (article 18, para. 8 of CCPRRR) (ESMA 91-372-1700, 01.06.2023).*
- *ESMA Guidelines on the application of the circumstances under which a central counterparty is deemed to be failing or likely to fail (article 22, para. 6 of CCPRRR) (ESMA 91-372-2070, 01.06.2023).*
- *ESMA Guidelines on the methodology to be used by the resolution authority for determining the valuation of contracts prior to their termination as referred to in Article 29(1) of CCPRRR (ESMA 91-372-206, 02.06.2023).*
- *ESMA Guidelines further specifying the circumstances for temporary restrictions in the case of a significant non-default event in accordance with Article 45a of EMIR (ESMA 91-372-1704, 02.06.2023).*
- *Guidelines for reporting under EMIR (ESMA 74-362-2281, 23.12.2023).*

National regulatory framework

In 2023, the Greek Parliament passed law 5042/2023 (Government Gazette A 88/10.4.2023) "Management of blocked, including confiscated, and seized assets, which are the proceeds of crime, measures for implementing Regulation (EU) 2021/23 of the European Parliament and of the Council of 16 December 2020 on a framework for the recovery and resolution of central counterparties and amending Regulations (EU) No 1095/2010, (EU) No 648/2012, (EU) No 600/2014, (EU) No 806/2014 and (EU) 2015/2365 and Directives 2002/47/EC, 2004/25/EC, 2007/36/EC, 2014/59/EU and (EU) 2017/1132, *measures for implementing Regulation (EU) 2019/1238 of the European Parliament and of the Council of 20 June 2019 on a pan-European Personal Pension Product (PEPP), and other provisions."*

In 2023, the Hellenic Capital Market Commission issued Decision 16/1007/21.12.2023 (Gov. Gaz, B 7769/31.12.2023) "Registration of tied agents of Investment Firms, FIFs, MFMFs, and AIFMs with extended purpose." The decision provides for the maintenance of a tied agents' register by the Hellenic Capital Market Commission, and specifies the conditions for registration, the organizational requirements for firms, and the procedure for deletion from the register.

Given the importance of adequate end effective management of the liquidity risk of open-end investment funds for the orderly operation of the financial system, the Hellenic Capital Market Commission issued circular no. 62 "Guidelines for managing the liquidity risk of Undertakings for Collective Investment in Transferable Securities (UCITS)," which is addressed to the supervised companies, gathers the main principles that must govern the management of UCITS liquidity risk, specifies certain aspects of the liquidity risk management framework as well as implementation issues, taking into account the conclusions drawn from recent supervisory actions at the national and European levels.

Finally, the law-drafting committee that had been formed in order to propose measures for the implementation measures for Regulation (EU) 2022/858 on a pilot regime for market infrastructures based on distributed ledger technology, completed its work in 2023.

Developments in EU legislation on sustainable finance[1]

Preface

(1) *This year 2023 was a landmark for "EU legislation on sustainable finance." This is due to the fact that all delegated acts provided for by the two main legislative acts that govern this area, i.e.* ***the "SFDR Regulation"*** *(Regulation (EU) 2019/2088 of 27 November 2019) and the* ***"Taxonomy Regulation"*** *(Regulation (EU) 2020/852 of 18 June 2020, have been issued by the European Commission and have now been put into force.*

(2) *The two aforementioned legislative acts of the European Parliament and of the Council, together with the so-called* ***"Climate Benchmark Regulation"*** *(Regulation (EU) 2019/2089 of 27 November 2019), contribute to the further consolidation of the internal market in the European Union (EU) and constitute the "regulatory trilogy" for implementing the Commission's 2015 Action Plan "building the Capital Markets Union" in relation to sustainable finance. Therefore, they are key sources of EU capital market legislation.*

According to EU institutions, they are all consistent with the EU principles of subsidiarity and proportionality, and comply in full with the limits set out by the provisions of primary EU legislation that "frame" sustainable finance legislation, i.e.: article 3(3) of the Treaty on European Union (TEU), certain

[1] *Article by Professor Christos Gortsos, School of Law National and Kapodistrian University of Athens, President of EBI Academic Board*

articles (3-4, 11 and 191) of the Treaty on the Functioning of the European Union (TFEU), and article 37 of the Charter of Fundamental Rights of the European Union. That said, any legal challenge of their validity in front of EU courts will reveal whether they comply in full with all the provisions mentioned above.

***(3)** The said legislative acts constitute an integral part of the wider **"EU green finance strategy"** of the last decade and are dated back to September 2015, when the Commission published its Capital Markets Union Action Plan. In this context, they constitute a key step towards achieving the target of reaching climate neutrality in the EU by 2050 based on the conclusions of the European Council of 12 December 2019 on climate change, which is consistent with the provisions of the United Nations Framework Convention on climate change ("the Paris **agreement** "), which was adopted at the UN Climate Change Conference in Paris, on **12 December 2015**.*

***(4)** It should also be noted that these EU initiatives fall under the wider framework of the **European Green Deal"**, the iconic strategy that places the environment at the heart of all relevant EU action. Sustainability parameters are an integral part of the EU green finance strategy for supporting the Green Deal. The **Communication from the Commission** of 11 December 2019 recognises, relevantly and inter alia, that there is a significant need for green finance and investment and that it is urgent to ensure a just transition.*

*As regards, in particular, the second aspect, of equal importance is the **Communication from the Commission** of 21 April 2021 on "EU Taxonomy, Corporate Sustainability Reporting, Sustainability Preferences and Fiduciary Duties: Directing finance towards the European Green Deal." This aims at providing basic signals about how the green finance toolbox facilitates access to finance for the transition. Moreover, in the European Green Deal Investment Plan that followed in January 2020, the Commission placed sustainable finance "at the heart" of the EU's financial system.*

The international dimension and catalytic role of the "Taxonomy Regulation"

***(1)** The EU has, since mid-2010, made it a priority to become a major standard-setter in the field of sustainable finance legislation. In order to achieve this target, it has been closely monitoring international developments and, primarily, the initiatives taken by relevant international financial fora (certain of which have also adopted international finance standards) and groups:*

- *the Financial Stability Board (**FSB**); the **Roadmap** and the two reports of 7 July 2021 ("FSB Roadmap for Addressing Climate-Related Financial Risks"; "FSB Report on Promoting climate-related disclosures"; "FSB Report on The availability of data with which to monitor climate-related financial stability risks") as well as the "2023 Progress Report on Climate-related Disclosures" of 12 October 2023 being of relevance;*

- *the "Task Force on Climate-related Financial Disclosures (**TCFD**)" which may belong to the private sector, albeit is promoted by the FSB, and the "Network for Greening the Financial System" (**NGFS**)";*

- *the International Organisation of Securities Commissions (**IOSCO'**), with the Reports on "Sustainable Finance and the Role of Securities Regulators and IOSCO" of April 2020, and "Sustainability-related Issuer Disclosures" of June 2021, as well as the Recommendations "on Sustainability-Related Practices, Policies, Procedures and Disclosure in Asset Management" of November 2021; and*

- *the Basel Committee on Banking Supervision (**BCBS**), the International Sustainability Standards Board (**ISSB**) – an independent body of the "International Financial Reporting Standards (**IFRS**) Foundation"– and the International Association of Insurance Supervisors (**IAIS**).*

(2) *These initiatives mostly pertain to issues related to sustainable finance reporting, and (in the case of BCBS and IAIS) with the prudential regulation and supervision of environmental risk-related banks and insurance companies. In this vein, it is noted that the adoption of the "Taxonomy Regulation" was a breakthrough at the international level, given that EU taxonomy is not based on international standards and the EU has transcended them. More specifically and indicatively, the South-African taxonomy, which has already been approved, also takes into account "the model adopted by the European Union", especially in regard to the six environmental objectives and the "do no significant harm" principles. Meanwhile, the government of the United Kingdom had submitted a proposal for a "green taxonomy" (still under consultation), which is explicitly based on the EU approach that the United Kingdom helped design as an ex-member state.*

The "big picture"

(1) *Moreover, various sustainability-related measures are introduced to corporate law at the EU level (including corporate governance, which is also partly included in EU capital markets legislation). In this sense, the key document is **"Accounting" Directive 2013/34/EU** of the European Parliament and of the Council of 26 June 2013 "on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings ..." that is currently in force as amended, inter alia, in 2014 by the so-called **"Non-financial Reporting Directive"** (**NFRD**). More recently, in 2022, it was further amended by article 1 of the (omnibus) "Corporate Sustainability Reporting Directive" (**CSRD**), which is being gradually applied since 2024, and according to which, inter alia, the scope of the Accounting Directive was widened in order to cover all large corporations and all companies that are listed in regulated markets. In addition, sustainability reporting was harmonised and standardised.*

(2) *Finally, it is noted that the Taxonomy Regulation and the SFDR also have a wider impact on the formation of EU financial and monetary legislation in general, since climate change and transition to a low-carbon economy entail clear and present risks to financial stability. In this context, the following should be pointed out: **First,** pursuant to the amendment of the Regulations governing the European Supervisory Authorities (ESAs, i.e. the European Banking Authority (EBA), the European Insurance and Occupational Pensions Authority (EIOPA) and the European Securities and Markets Authority (ESMA) in December 2019, ESAs are required to take into account sustainable business models and the incorporation of **"ESG factors"** when carrying out their statutory tasks. Meanwhile, on 20 May 2019 the Capital Requirements Regulation and Directive (CRR – CRD IV) were also amended, leading to the introduction of new rules, which, inter alia, specify the grounds for EBA action, as part of its enhanced* *duties and powers, in relation to sustainable finance. These developments were of particular importance given that, among other things, the ESAs were actively involved in the preparation of regulatory technical standards in relation to the issuance of (certain) Commission delegated acts, as specified in SFDR and the EU regulation on climate benchmarks. Moreover, the EBA has published reports on the prudential aspects of ESG risks, such as the one dated 26 June 2021 "On management and supervision of ESG risks for credit institutions and investment firms" – i.e. the characteristics that may have a positive or negative impact on the financial performance or solvency of an entity, sovereign or individual. Later on, on 18 January 2024, a public consultation on the relevant draft recommendations that are about to be adopted pursuant to article 16 of its regulation was launched.* ***Second,*** *and most importantly, sustainability-related measures are integrally incorporated in the developing, cross-sectoral field* ***"EU legislation on sustainable finance."*** *This is true to the extent that sustainable finance can (now) be also considered as a standalone objective of financial regulation in the EU.* ***Finally,*** *it should not escape one's attention that sustainable finance is becoming increasingly important for single monetary policy in the Eurosystem, and therefore also for the formation of* ***"EU legislation on sustainable finance."***

DEVELOPMENTS IN THE GREEK CAPITAL MARKET

Equity and equity-like markets

Market capitalisation, returns and other characteristics of the markets of the Athens Exchange

By the end of 2023 the market capitalisation of shares listed on the Securities Market of the Athens Exchange stood at 87,514.31 million euros (taking into account shares in suspension of trading), increased by 32.88% as compared to 2022, when it stood at 65,861.95 million euros. The market capitalisation of shares listed on the Main Market category amounted to 87,419.91 million, as compared to 65,139.50 million in 2022, and accounted for 99.89% of the total market capitalisation of stocks listed in the Athens Exchange (as compared to 98.9% at the end of the previous year). The market capitalisation of the Under Surveillance category stood at 81.85 million euros at the end of 2023 (a significant reduction from 372.52 million euros at the end of 2022, which is partly due to the de-listing of shares) accounting for 0.09 % of total market capitalisation, (as compared to 0.57% in 2022). The ratio of total market capitalisation to Greece's GDP was increased year-on-year (to 39.29% from 31.66% in 2022).

The top ten shares in terms of market capitalisation at the end of 2023 were the following (their share in total market capitalisation is shown in brackets): COCA COLA HBC AG (18.50%), EUROBANK ERGASIAS SERVICES AND HOLDINGS SA (11.25%), NATIONAL BANK OF GREECE (10.81%), GREEK ORGANISATION OF FOOTBALL PROGNOSTICS (OPAP SA) (10.69%), HELLENIC TELECOMMUNICATIONS ORGANISATION (OTE) (10.13%), MYTILINEOS SA (9.86%), PUBLIC POWER CORPORATION SA (8.01%), PIRAEUS FINANCIAL HOLDINGS SA (7.52%), ALPHA SERVICES AND HOLDINGS SA (6.80%), JUMBO SA (6.42%). The market capitalisation of these ten companies' shares stood at 53.21 billion euros as per the end of 2023 (as *compared to 39.41 billion euros in 2022) and accounted for 60.86% of the total market capitalisation of shares listed in the Athens Exchange (60.50% in 2022).*

The market capitalisation of shares listed in the Alternative Market of the Athens Exchange stood at 450.37 million euros at the end of 2023, as compared to 280.05 million euros in 2022.

TABLE 3. Market Capitalisation of shares traded in the Securities Market and the Alternative Market of the Athens Exchange (€ million), 2023

Month*	Securities Market			Alternative Market
	Main market	Surveillance	Suspension	
Jan.	70,184.72	399.36	349.93	295.31
Feb.	76,628.44	436.09	349.93	319.62
Mar.	72,657.83	388.35	349.93	326.64
Apr.	74,641.59	371.26	450.94	349.42
May	82,015.55	370.47	352.32	365.57
Jun.	85,543.60	372.27	352.32	411.59
Jul.	88,848.78	406.38	352.32	441.65
Aug.	87,505.40	433.21	352.32	442.36
Sep.	81,096.87	392.64	352.32	428.18
Oct.	80,396.73	597.50	352.32	422.14
Nov.	86,355.00	159.05	352.32	426.65
Dec.	87,419.91	81.85	12.55	450.37

Source: ATHEX.

Note: The point of reference is market capitalisation on the last trading day of each month.

TABLE 4. ATHEX Securities Market cumulative data, 2013-2023

End of year	Market Capitalisation (€ million)	ATHEX Composite Share Price Index	No. of Listed Companies	Market Capitalisation (% of GDP)
2023	87,514.31	1293.14	145	39.29%
2022	65,861.95	929.79	154	31.66%
2021	66,078.32	893.34	154	37.20%
2020	53,431.51	808.99	160	32.22%
2019	61,217.27	916.67	169	32.66%
2018	44,884.04	613.3	178	24.18%
2017	54,055.32	802.37	191	30.27%
2016	45,101.80	643.64	207	25.6%
2015	46,717.67	631.35	229	26.60%
2014	52,916.45	826.18	233	29.70%
2013	66,514.89	1162.68	251	36.80%

Source: ATHEX, HCMC

Note: GDP is calculated at current market prices

At the end of 2023, the ATHEX Composite Share Price Index closed at 1293.14 units, registering a year-on-year gain of 39.08% (929.79 units in 2022). During the year, the index fluctuated around 1200 units. The index registered its lowest closing value in January (929.79); this value was higher than the corresponding low for the year 2022 (779.20). The index reached its high for the year in July (1351.68); this value was higher than the corresponding highest value for the year 2022 (971.09). The cumulative return of the ATHEX Composite Share Price Index for the period 2012-2022 is shown on Table 5.

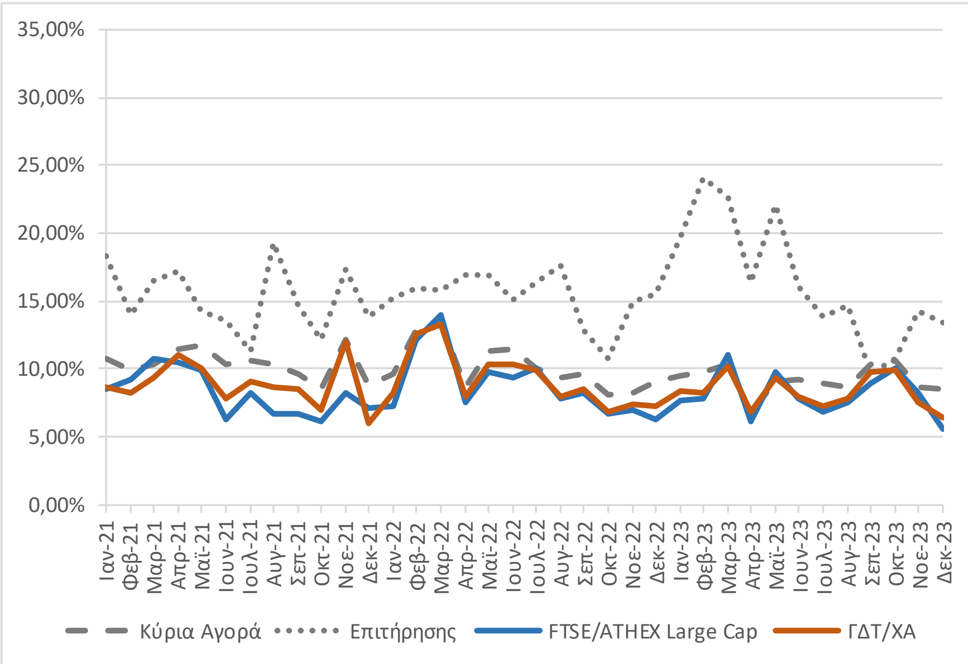
TABLE 5. Cumulative Return (%) of the ATHEX Composite Share Price Index, 2013-2023

		Return Year									
		2023	2022	2021	2020	2019	2018	2017	2016	2015	2014
Base year	2022	39.08%									
	2021	44.75%	4.08%								
	2020	59.85%	14.93%	10.43%							
	2019	41.07%	1.43%	-2.55%	-11.75%						
	2018	110.85%	51.60%	45.66%	31.91%	49.47%					

2017	**61.17%**	15.88%	11.34%	0.83%	14.25%	-23.56%				
2016	**100.91%**	44.46%	38.79%	25.69%	42.42%	-4.71%	24.66%			
2015	**104.82%**	47.27%	41.50%	28.14%	45.19%	-2.86%	27.09%	1.95%		
2014	**56.52%**	12.54%	8.13%	-2.08%	10.95%	-25.77%	-2.88%	-22.09%	-23.58%	
2013	**11.22%**	-20.03%	-23.17%	-30.42%	-21.16%	-47.25%	-30.99%	-44.64%	-45.70%	-28.94%

The Alternative Market Share Price Index closed at 9352.11, increased by 65.66%. The volatility of the ATHEX Composite Share Price Index, the FTSE/ATHEX Large Cap index, and the shares traded in the Main Market and Surveillance Segments of the Securities Market of the Athens Exchange is presented in Figure 2, on a monthly basis for the period 2021-2023.

FIGURE 2. Monthly volatility in the Athens Exchange, 2021-2023



Source: ATHEX *Note.: Monthly volatility is derived from the change of closing prices for each trading day of the month*

All other ATHEX indices registered gains, including sectoral ones. The largest year-on-year gains were registered by the FTSE/ATHEX Mid Cap Total Return index (63.17%) and the FTSE/ATHEX Mid Cap index (59.47%). Table 6 presents the closing values at the end of 2022 and 2023 and the percentage year-on-year changes for the indices of the Athens Exchange.

TABLE 6. ATHEX Main and Other Indices, 2022-2023

Athens Exchange Indices	2023	2022	Annual change (%)
Composite Share Price Index	1293.14	929.79	39.08%
ATHEX ESG Index	1471.77	1057.67	39.15%
FTSE/ATHEX Large Cap	3122.79	2251.51	38.70%
FTSE/ATHEX Mid Cap	2250.81	1411.43	59.47%
FTSE/ATHEX Market Index	746.82	539.35	38.47%
Comp. Share Price Index, Total Return	2355.44	1614.17	45.92%
FTSE/ATHEX Large Cap Total Return	5167.18	3600.98	43.49%
FTSE/ATHEX Mid Cap Total Return	3031.21	1857.67	63.17%
Hellenic Mid & Small Cap Index	1929.00	1365.14	41.30%
FTSE/ATHEX High Dividend Yield	3771.38	3028.28	24.54%
FTSE/ATHEX High Dividend Yield TR	4489.71	3396.71	32.18%
Athex Composite Share Price Index	302.00	230.24	31.17%
MSCI GREECE REBASED	4984.69	-	-

Source: ATHEX

Note: The closing price refers to the last trading day of each month.

Table 7 presents ATHEX sectoral index data per month for the entire year 2023. It should be noted that, in the context of the semiannual revision of FTSE/ATHEX indices of 18 December 2023, nine new sectoral indices were created, in replacement of the nineteen existing ones, with the exception of the Banks sectoral index (the calculation of which is the same as before the revision). Moreover, certain indices were merged as follows: Technology & Telecommunications, Energy & Utilities. The starting value of the new sectoral indices was set at 5000 units. The largest year-on-year gains were registered by the FTSE/ATHEX Industries index (68.92%), the FTSE/ATHEX Financial Services index (66.29%) and the FTSE/ATHEX Banks index (65.73%).

TABLE 7. Sectoral Share-price Indices in the ATHENS EXCHANGE, FTSE/ATHEX, 2023

Month	Banks	Fin. Services	Energy*	Real Estate	Industries	Basic Resources	Technology*
Jan.	773.31	813.35	5153.78	4245.26	5396.44	7328.30	2170.75
Feb.	929.94	1265.30	5714.39	4398.66	5782.19	7420.67	2227.25
Mar.	759.91	1179.92	5334.43	3948.93	5917.83	6866.47	2233.86
Apr.	794.86	999.73	4925.00	3829.76	6001.05	7604.50	2311.64
May	958.27	1263.57	5487.52	4301.38	6725.59	8493.63	2566.93
Jun.	1009.03	1272.42	5305.82	4487.15	7369.64	9047.45	2684.31

Month	Banks	Fin. Services	Energy*	Real Estate	Industries	Basic Resources	Technology*
Jul.	1086.81	1428.08	5317.76	4665.17	8559.06	10145.39	2954.46
Aug.	1063.13	1309.48	5436.14	4479.33	8466.33	10401.27	3110.21
Sep.	918.16	1183.47	5371.33	4119.23	7876.93	7992.90	2782.86
Oct.	962.95	1195.83	5043.08	4052.83	7867.98	7481.85	2769.54
Nov.	1082.70	1287.24	5553.05	4347.26	8299.14	8312.03	3051.53
Dec.	1061.62	5014.23	4987.63	4960.50	5081.43	4869.63	5072.46
Annual % change	**65.73%**	**66.29%**	**20.31%**	**-0.42%**	**68.92%**	**24.24%**	**27.48%**

Source: ATHEX
Note: The closing price refers to the last trading day of each month.
** In the context of reshaping the Sectoral Indices in December 2023, the Technology & Telecommunications and Energy & Utilities indices were merged.*

Value of Trading

In 2023, the total value of equity trading in the Securities Market of the Athens Exchange stood at 28.7 billion euros (as compared to 17.94 billion euros in 2022), increased by 59.97% year-on-year. Its average monthly value stood at 2.39 billion euros, while the highest value for the year (3.81 billion euros) was recorded in November and the lowest (1.25 million euros) in April. The value of trading in exchange-traded funds increased to 21.32 million euros from 4.08 million euros in 2022, discontinuing the decline of the past few years.

The total value of equity trading in the Alternative Market of the Athens Exchange stood at 134.08 million euros, as compared to 100.95 million euros in 2022, up by 32.82%. Its average monthly value stood at 11.17 billion euros, while the highest value for the year was recorded in June (16.19 billion euros) and the lowest was recorded in September (6.02 million euros).

TABLE 8. Value of equity trading in the markets of the Athens Exchange (million €), 2023

Month	Securities Market					Alternative Market
	Shares		Exchange traded funds	Rights	Total	
	Main market	Surveillance				
Jan.	1,895.84	4.92	0.82	2.90	1,904.48	7.03
Feb.	2,517.01	10.63	0.86	0.00	2,528.50	13.21
Mar.	2,556.28	4.73	0.58	0.02	2,561.61	15.73

Month	Securities Market					Alternative Market
	Shares		Exchange traded funds	Rights	Total	
	Main market	Surveillance				
Apr.	1,243.67	1.65	0.38	0.02	1,245.81	13.38
May	2,580.95	3.86	1.37	0.00	2,586.18	12.85
Jun.	2,481.07	3.98	3.00	0.00	2,488.05	16.19
Jul.	1,928.68	4.81	0.58	0.00	1,934.07	14.91
Aug.	2,249.10	5.14	0.37	0.01	2,254.62	8.76
Sep.	2,092.88	6.16	1.08	0.01	2,100.12	6.02
Oct.	1,996.42	8.51	4.35	1,404.87	3,414.15	7.35
Nov.	3,802.91	2.78	4.53	0.00	3,810.21	8.65
Dec.	1,864.74	0.66	3.41	0.00	1,868.85	10.01
Total 2023	**27,209.55**	**57.84**	**21.32**	**1,407.82**	**28,696.66**	**134.08**

Source: ATHEX

In 2023, average turnover velocity for shares traded in the Main Market discontinued the decline of the last two years and fluctuated, on a monthly basis, around 1.72% (the corresponding annual average for 2022 was 1.16%). The average annual turnover velocity for shares in the Surveillance category stood at 0.60% as compared to 1.20% in 2022. Finally, the corresponding rates for the Composite Share Price Index and the FTSE/ATHEX Large Cap index were 2.15% (1.09% in 2022) and 2.35% (1.05% in 2022) respectively.

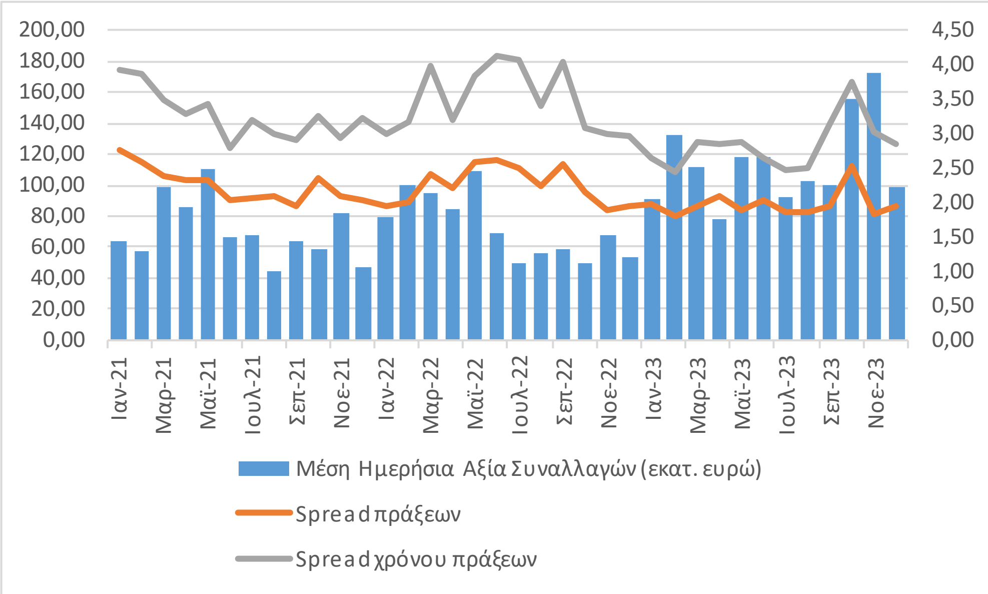
TABLE 9. Average turnover velocity, per month, 2023

Month	Main market	Surveillance	FTSE/ATHEX Large Cap	ATHEX Composite Price Index
Jan.	1.70%	0.48%	2.37%	2.39%
Feb.	2.25%	1.43%	2.92%	2.94%
Mar.	1.59%	0.80%	3.12%	2.41%
Apr.	1.17%	0.33%	1.42%	1.78%
May	1.60%	0.56%	2.88%	2.30%
Jun.	1.99%	0.52%	2.57%	2.53%
Jul.	2.23%	0.57%	1.94%	2.13%
Aug.	2.31%	0.56%	2.37%	2.09%
Sep.	1.49%	0.39%	2.24%	1.91%
Oct.	1.36%	0.47%	2.15%	1.69%
Nov.	1.56%	0.63%	2.46%	1.91%
Dec.	1.35%	0.41%	1.71%	1.71%

Source: ATHEX

The bid-ask spread in relation to the value of trading for the period 2021-2023 is presented in Figure 3.

FIGURE 3. Average monthly bid-ask spread and average daily value of trading, 2021-2023



Source: ATHEX

Note: Spread: The difference between the best offered purchase price (bid) and the best offered sales price (ask) divided by the midpoint of these prices.

Trades spread: The average of the spreads corresponding to certain trades, weighted by the percentage value of transactions for these trades. The spread that corresponds to the value of transactions for a trade, is the one observed immediately prior to the execution of the trade.

Trading day spread: The average of the spreads observed during the trading session, weighted by the percentage time duration.

New DSS Accounts and Investor Participation in the Athens Exchange

In 2023, 25,090 new accounts were opened in the Dematerialised Securities System (DSS), (as compared to 16,465 in 2022), representing a 52.38% year-on-year increase, while 105,706 accounts were deactivated (as compared to 104,957 deactivations in 2022). The average number of active accounts stood at 25,091 (as compared to 21,607 in 2022). The highest number of active accounts was recorded in February (28,333), while the lowest was recorded in April (18,383).

TABLE 10. Number of new Investor Accounts in the DSS by month, 2021-2023

Month	2023		2022		2021	
	Active accounts	New accounts	Active accounts	New accounts	Active accounts	New accounts
January	24,422	1,138	28,227	1,926	22,979	835
February	28,333	1,321	31,533	1,892	20,383	750

Month	2023		2022		2021	
	Active accounts	New accounts	Active accounts	New accounts	Active accounts	New accounts
March	28,238	1,343	26,488	980	39,228	2,915
April	18,383	937	19,690	951	27,121	987
May	25,691	1,128	23,424	796	36,091	1,678
June	27,219	1,815	21,108	1,001	23,586	816
July	26,791	5,210	19,459	5,148	29,191	1,709
August	23,518	1,710	18,276	805	20,583	578
September	23,383	3,649	17,781	812	23,032	754
October	23,636	2,186	15,635	705	25,958	2,184
November	26,193	2,580	19,290	702	34,611	2,457
December	25,282	2,073	18,374	747	31,598	3,091
Average active accounts	**25,091**		**21,607**		**27,863**	
Total new investor accounts		**25,090**		**16,465**		**18,754**
Account deactivations	**105,706**		**104,957**		**305,704**	

Source: Hellenic Exchanges

In 2023, domestic investor participation (including the Hellenic Financial Stability Fund – HFSF) to the market capitalisation of the Athens Exchange was slightly reduced year-on-year (to 35.63% from 36.39%). The participation of retail domestic investors stood at 13,382.52 million euros or 16.57% of the total market capitalisation in the Athens Exchange as compared to 10,491.07 million euros or 17.54% in 2022, while the participation of the HFSF fell to 3.20% (2,583.51 million euros) from 3.72% (2,228.19 million euros) in 2022. In contrast, according to trading data by the Athens Exchange, domestic investors were net buyers, i.e. the value of their purchases exceeded the value of their sales by 17.63 million euros. The participation of foreign investors to the market capitalisation of the Athens Exchange was slightly increased year-on-year (to 64.37% from 63.61% in 2022). In 2023, foreign investors were net sellers (the value of their sales exceeded the value of their purchases by 17.63 million euros).

TABLE 11. Investor participation in the total capitalisation of the Athens Exchange, December 2023

	Investor Accounts with balances		Capitalisation	
	Number	Percentage (%)	Value (€ million)	Percentage (%)
I. Domestic Investor Account Beneficiaries	**470,669**	**98.04%**	**28,775.71**	**35.63%**
Domestic Client Account Beneficiaries	**470,645**	**98.03%**	**28,705.93**	**35.54%**
Retail	467,657	**97.41%**	13,382.52	**16.57%**
Private financial undertakings	269	**0.06%**	4,843.06	**6.00%**
.Private non-profit institutions	509	**0.11%**	293.14	**0.36%**
Non-financial undertakings	1,984	**0.41%**	6,415.10	**7.94%**
Public Sector	97	**0.02%**	1,188.27	**1.47%**
Non- EU Organisations	1	**0.0002%**	0.03	**0.00004%**
Other domestic investors	127	**0.03%**	0.3	**0.0004%**
.Hellenic Financial Stability Fund	1	**0.0002%**	2,583.51	**3.20%**
Domestic Client Account Beneficiaries	**24**	**0.005%**	**69.78**	**0.09%**
II. Foreign Investor Account Beneficiaries	**9,410**	**1.96%**	**51,994.52**	**64.37%**
Foreign Client Account Beneficiaries	**9,352**	**1.95%**	**49,857.35**	**61.73%**
Retail	5,984	**1.25%**	2,440.91	**3.02%**
Private financial undertakings	2,725	**0.57%**	31,623.20	**39.15%**
.Private non-profit institutions	25	**0.01%**	132.07	**0.16%**
Non-financial undertakings	538	**0.11%**	13,355.72	**16.54%**
Public Sector & Organisations	78	**0.02%**	2,305.44	**2.85%**
Other foreign investors	2	**0.0004%**	0.01	**0.00001%**
Foreign Account Beneficiaries Clients	**58**	**0.01%**	**2,137.17**	**2.65%**
Total I +II	**480,079**	**100.00%**	**80,770.23**	**100.00%**

Source: ATHEX

Note: Private financial undertakings include insurance companies and private occupational insurance funds, mutual funds, portfolio and real estate investment companies, banks and multilateral development banks, and other financial institutions. Non-financial undertakings include private and public companies the main activity of which is the production of goods and the provision of non-financial services. The public sector includes central government, local government organisations, and social security organisations. Organisations (foreign investors) include organisations of the European Union (EU) and non-EU international organisations.

Net profits and Dividends of ATHEX -Listed Companies

The weighted with the sector's market capitalisation price to (after-tax) earnings ratio (P/E) for the entire Main market was equal to 7.79 as compared to 24.94 in 2022. The sector capitalisation-weighted dividend yield (D.Y.) of all companies listed in the Main Market of the ATHEX stood at 2.75% as compared to 2.82% in 2022.

TABLE 12. Price to Earnings (P/E) ratio and listed company dividend yields, 2013-2023

End of year	Weighted P/E (after taxes)	Dividend Yield Percent
2023	7.8	2.8
2022	24.9	2.8
2021	44.7	2.0
2020	24.6	2.9
2019	12.9	5.0
2018	18.0	3.4
2017	16.7	2.6
2016	6.7	0.9
2015	6.9	1.0
2014	9.3	3.2
2013	23.3	2.4

Source: ATHEX.

Note: P/E and dividend yield weighting takes into account the market capitalisation of listed companies on the basis of the closing price at the end of the year in relation to the sum of the sector's capitalisation. In particular, average capitalisation was used to calculate the P/E for 2020. Weighted P/E calculations do not take into account companies that registered losses or had P/E ratios larger than or equal to 100. Weighted dividend yield calculations do not take into account companies that did not pay out any dividends for the previous fiscal year.

The Fixed-income securities market

In 2023, based on data from the System for Monitoring Transactions in Book-entry Securities of the Bank of Greece (BoG), the nominal value of secondary market trading on Greek Government bonds stood at 3,589.97 billion euros, an amount 36.80% higher than the corresponding amount for the previous year (2,624.33 billion euros). The average monthly value of trades stood at 299.16 billion euros. The highest value of trades was recorded in December (475.5 billion euros), while the lowest was recorded in October

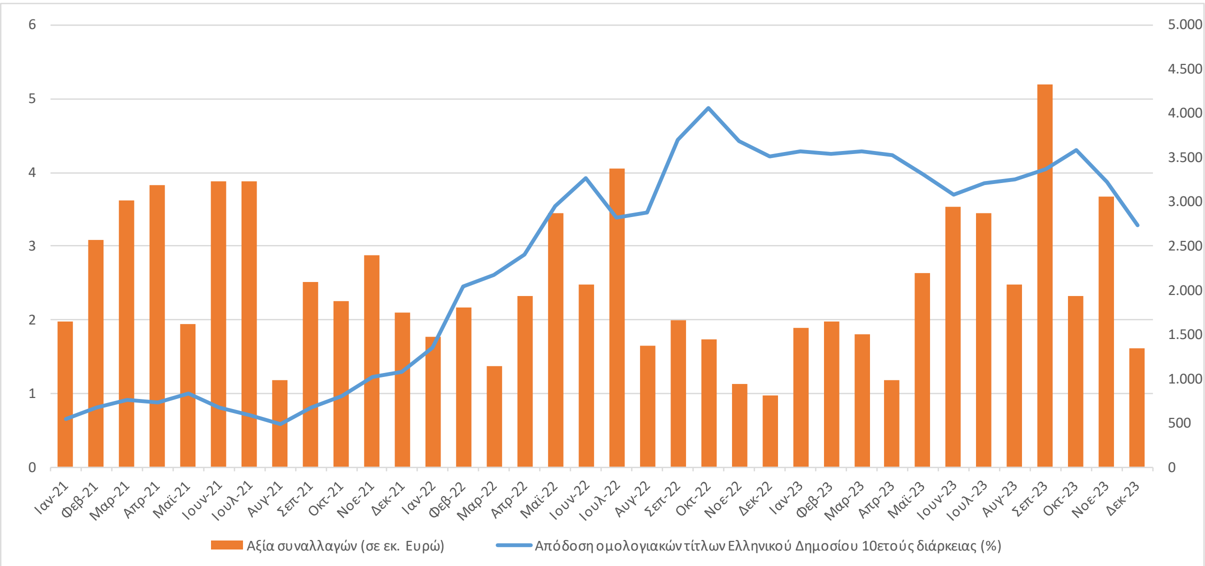
(215.16 billion euros). Moreover, the number of trades increased by 35.41% year-on-year, (74,592 trades as compared to 55,087 trades in 2022).

The total value of transactions in the Electronic Secondary Government Bonds Market (HDAT) stood at 26.45 billion euros as compared to 20.93 billion euros in 2022. The average monthly value of trading stood at 2.20 billion euros. The month with the highest value of trading was September (4,337 million euros), while April was the month with the lowest value of trading (980 million euros) for the year.

At the end of 2023, the ratio of negotiable debt (bonds and T-bills) to total debt stood at 25.20%, as compared to 24.17% in 2022.

In December 2023, the average yield of the ten-year benchmark bond stood at 3.28%, much lower than in December 2022 (4.22%), and was the lowest for the year. Its highest yield for the year was recorded in October (4.30%). Finally, in December 2023, the average yield of five-year bonds was 2,76% (as compared to 3.31% at the end of 2022) and the yield of twenty-year bonds was 3.87% (as compared to 4.02% in December 2022).

FIGURE 4. Government 10-year Bond yield and Value of trading in HDAT, 2021-2023



Source: Bank of Greece

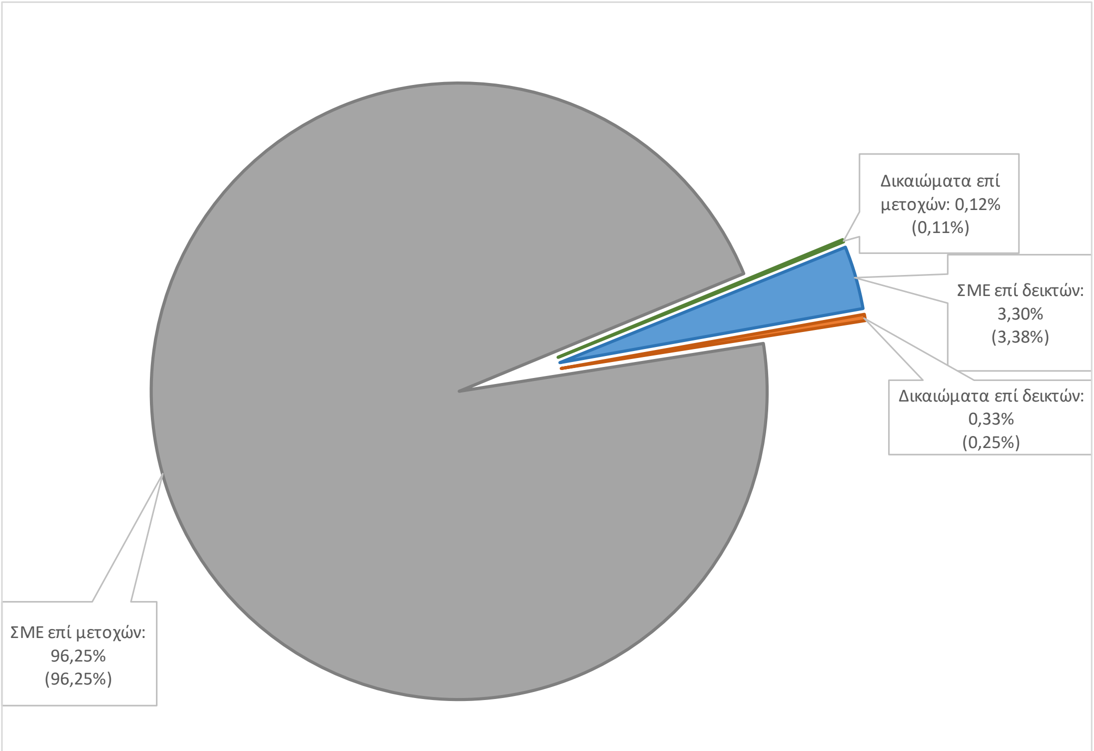
The value of trading on corporate bonds in the Securities Market of the Athens Exchange was reduced by -9.81% and stood at approximately 219.80 million euros, as compared to 243.70 million euros in 2022. The average monthly value of trading stood at approximately 18.32 million euros. The highest value of trades was recorded in July (30.31 billion euros), while the lowest was recorded in April (8.50 billion euros). The value of trading on corporate bonds in the Alternative Market more-than-doubled and stood at approximately 1.94 million euros as compared to 919,209 euros in 2022.

The Derivatives Market

In 2023, there was an increase in trading activity in the Derivatives Market of the Athens Exchange, while at the same time. there was an increase in the number of active accounts as a percentage of the total number of end investor accounts. Moreover, the ratio of ATHEX member to client transaction value remained unchanged for all products traded in the derivatives market.

The average daily volume of trading in stock and index futures and options stood at 43,965 contracts (as compared to 34,351 contracts in 2022), increased by 27.99% year-on-year. On a monthly basis, the average daily volume of trading on all types of derivatives showed fluctuations during the year, registering its highest value in March (71,976 contracts) and its lowest value in July (22,489 contracts). The share of stock futures in the average daily volume of trading in all derivative products remained unchanged at 96.25%, while the corresponding share of index futures marginally fell to 3.30% from 3.38% in 2022 (Figure 5).

FIGURE 5. Distribution of the Volume of Trading in the derivatives market per type of derivative, 2023 (in brackets the percentages for the year 2022)



Source: ATHEX, HCMC

The largest average daily trading volume was, since the beginning of the year, that of the stock futures for the ALPHA Bank (18,452 contracts), followed by stock futures for Piraeus Bank (8,548 contracts) and for Eurobank Ergasias (3,716 contracts).

The number of end investor-client accounts remained almost unchanged (32,664 at the end of December 2023 as compared to 32,678 at the end of December 2022), while the number of active accounts was increased (to 1,893 at the end of December 2023 from 1,704 at the end of December 2022). As a result, the corresponding percentage of the total number of end investor-client accounts rose to 5.33% from 4.88% in 2022. Moreover, the monthly average number of investor accounts was marginally increased to 32,875 from 32,537 in 2022, while the average monthly number of active accounts rose to 1,754 from 1,586 in 2022. Table 13 presents data pertaining to the derivatives market of the Athens Exchange.

TABLE 13. Derivatives market data, 2021-2023

	Dec. 2023	Dec. 2022	Dec. 2021
Trading Members	23	24	26
Clearing Members	17	17	18
- Direct Clearing Members	10	10	11
- General Clearing Members	7	7	7
Client Accounts	32,664	32,678	33,031
Products (Index & Equity)	43	35	36

Source: ATHEX.

The ratio of ATHEX-member to client transaction value for all the products traded in the derivatives market remained almost unchanged y-o-y at 46:54 (Table 14). It is worth noting the reversal of the ratio on index Futures in favour of trading members for the first time after five years.

TABLE 14. Distribution of Contracts in the Derivatives market, 2021-2023

Derivative products	Distribution of trades					
	Average 2023		Average 2022		Average 2021	
	Members	Clients	Members	Clients	Members	Clients
Index Futures	54.30%	45.70%	48.47%	51.53%	39.36%	60.64%
Index Options	58.19%	41.81%	60.84%	39.16%	62.39%	37.61%
Stock Futures	35.19%	64.81%	35.91%	64.09%	35.20%	64.80%
Stock Options	36.09%	63.91%	41.65%	58.35%	48.66%	51.34%
TOTAL PRODUCTS	**45.94%**	**54.06%**	**46.72%**	**53.28%**	**46.40%**	**53.60%**

Source: ATHEX

The ratio of the value of transactions in the derivatives market to the value of transactions in the underlying market of the Athens Exchange increased year-on-year for all types of derivatives. More specifically, the average monthly ratio of the value of trading in futures on the FTSE/ATHEX Large Cap to the total value of trading on the underlying equities that comprise this index stood at 8.47%, as *compared to 7.60% in 2022, while the average monthly ratio of trading in stock futures to the total value of trading in the underlying market rose to 14.06% from 12.50% in 2022.*

TABLE 15. Value of trading in the derivatives market and the underlying market, 2023

Month	Futures on the FTSE/ATHEX LARGE CAP index	Options on the FTSE/ATHEX LARGE CAP	Stock Futures	Stock Options
Jan-23	9.31%	0.57%	10.04%	0.11%
Feb-23	9.03%	0.39%	9.51%	0.04%
Mar-23	10.00%	0.97%	19.84%	0.11%
Apr-23	11.58%	0.80%	8.99%	0.08%
May-23	8.35%	0.76%	9.66%	0.16%
Jun-23	7.26%	0.70%	22.90%	0.06%
Jul-23	8.47%	1.38%	9.48%	0.18%
Aug-23	7.77%	1.00%	8.81%	0.11%
Sep-23	10.76%	0.84%	27.80%	0.08%
Oct-23	9.80%	1.04%	10.03%	0.08%
Nov-23	3.46%	0.68%	6.19%	0.04%
Dec-23	5.90%	1.06%	25.44%	0.12%
Average 2023	**8.47%**	**0.85%**	**14.06%**	**0.10%**
Average 2022	**7.60%**	**0.57%**	**12.50%**	**0.08%**

Source: ATHEX.

The call:put ratio concerning trading in options on an annual basis (i.e. total volume of call options to total volume of put options) stood at 0.91 in 2023 as compared to 1.05 in 2022. On a monthly basis, the ratio showed fluctuations, with the highest value, 1.77, being recorded in October and the lowest value, 0.53, recorded in May.

SECURITY ISSUANCE

Greek Government security issuance

In 2023, according to data from the Public Debt Management Agency, the Greek Government issued Treasury bills (13 and 26 weeks), of a total value of 23.59 billion euros as compared to 23.4 billion euros in 2022. Moreover, there were seventeen issues and reissues of Greek Government bonds with maturities of 5, 10, 15 and 20 years, amounting to 15.34 billion euros as compared to 7.85 billion euros in 2022. The average weighted cost of new borrowing stood at 3.71% on 31.12.2023, markedly increased from 1.33% in 2022, reflecting the overall upward trend of interest rates during the past two years. In 2023, new

Greek Government debt originated by 43.9% from the issuance of Treasury bills, and 42% from the issuance of fixed rate bonds, while the remaining 14.1% originated from loans (NGEU programmes, EIB). Moreover, at the end of the year, the average-weighted maturity of central government debt was 16.91 years, as compared to 17.54 years in 2022.

Corporate Security Issuance

In 2023, there were eight issues of shares, either by companies that already had securities admitted to trading or as initial public offerings with admission to trading in the Securities Market of the ATHEX. Moreover, there were two corporate bond issues by companies that already had securities admitted to trading. Total funds raised through the issuance of shares and bonds stood at 954.04 billion euros and 600 billion euros respectively.

Share issuance

During the year, there were four share capital increases through issuance of new shares by ATHEX-listed companies, as compared to eight in 2022. The funds raised amounted to almost 747.29 million euros, as compared to 370.96 million euros in 2022. Moreover, there were four share capital increases with admission of shares for trading for the first time in the Securities Market of the Athens Exchange. Table 16 presents the funds raised per company through the issuance of shares in 2023.

TABLE 16. Funds raised through share issuances, 2023

Company	Trading category	Total Funds Raised
		(A) Share capital increase through issuance of new shares by ATHEX-listed companies
ATTICA BANK	Main market	473,346,868.50
ATTICA BANK	Main market	63,944,501.88
INTRALOT SA	Main market	135,000,000.18
TRASTOR REIC	Main market	74,999,990.90
Total funds raised through the issuance of new shares		***747,291,361.46***
		(B) Initial public offering of stock for trading
AUSTRIACARD HOLDINGS AG	Main market	-
OPTIMA BANK S.A.	Main market	150,860,644.56
TRADE ESTATES REIC	Main market	55,887,327.36
ORILINA PROPERTIES REIC	Main market	30,590,000.00
Total funds raised with listing of shares		***206,747,971.92***
Grand Total of Funds Raised (A) + (B)		***954,039,333.38***

Source: HCMC

Table 17 presents annual data on the number of share capital increases by ATHEX-listed companies during 2017-2023, as well as the corresponding amount of funds raised.

TABLE 17. Share Capital Increases by ATHEX-listed companies, 2017-2023.

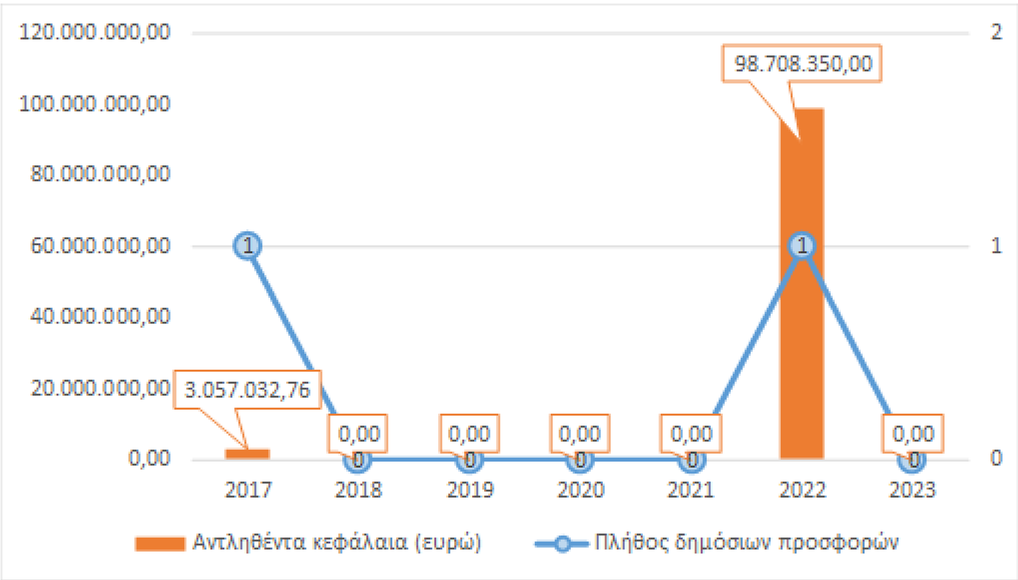
Year	Share capital increase by already listed companies*	
	Number	Total Funds Raised (€ million)
2023	4	747.29
2022	8	370.96
2021	12	4,267.40
2020	6	93.22
2019	8	740.48
2018	6	186.76
2017	6	132.52

Source: HCMC

**Note: Share capital increases due to merger are not included.*

Figure 6 presents annual data on the public offering of shares without admission to trading in ATHEX during the period 2017-2023.

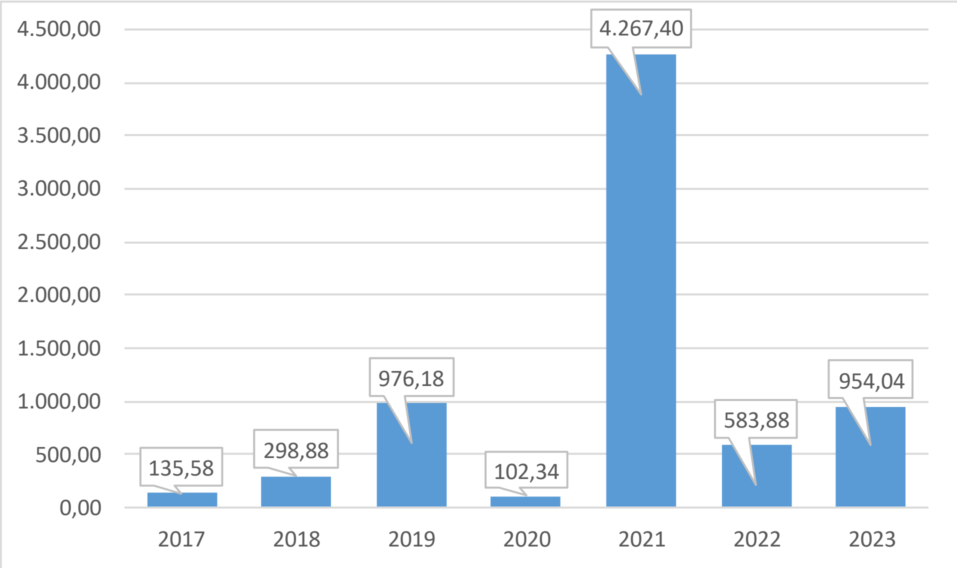
FIGURE 6. Public offering of shares without admission to trading, 2017-2023



Source: HCMC

Figure 7 presents the total amount of funds raised per year through share issuance (including share capital increases due to merger or without admission to trading) for the period 2017-2023.

FIGURE 7. Total funds raised through share issuance (€ mn), 2017-2023



Source: HCMC

The quarterly distribution of share capital increases by ATHEX-listed companies in the period 2021-2023, based on the date of the approval of the relevant prospectuses by the Hellenic Capital Market Commission, is presented in Table 18. In the cases of companies where the approval was given in dates belonging to two different quarters, the reference period is that of the first approval. Moreover, wherever the approval of a Prospectus by the Hellenic Capital Market Commission is not required, the date used is the date of listing in the Athens Exchange.

TABLE 18. Quarterly distribution of share capital Increases by ATHEX Listed Companies, 2021-2023

Quarter	Number of issues			Total Funds Raised (€ mn)		
	2023	2022	2021	2023	2022	2021
1st	1	2	1	473.35	52.91	20.03
2nd	-	1	5	-	129.22	2,253.90
3rd	-	1	3	-	12.23	251.62
4th	3	4	3	273.94	176.59	1,741.85
Total	**4**	**8**	**12**	**747.29**	**370.96**	**4,267.40**

Source: HCMC

Bond Issuance

In 2023, there were two corporate bond issues, as compared to four in 2022, which concerned five-year or seven-year bonds. In both cases the bonds were issued by companies that already had securities admitted to trading in the Athens Exchange. The funds raised amounted to 600 million euros, as *compared to 530 million euros in 2022. Table 19 presents the funds raised per company through the issuance of corporate bonds in 2023.*

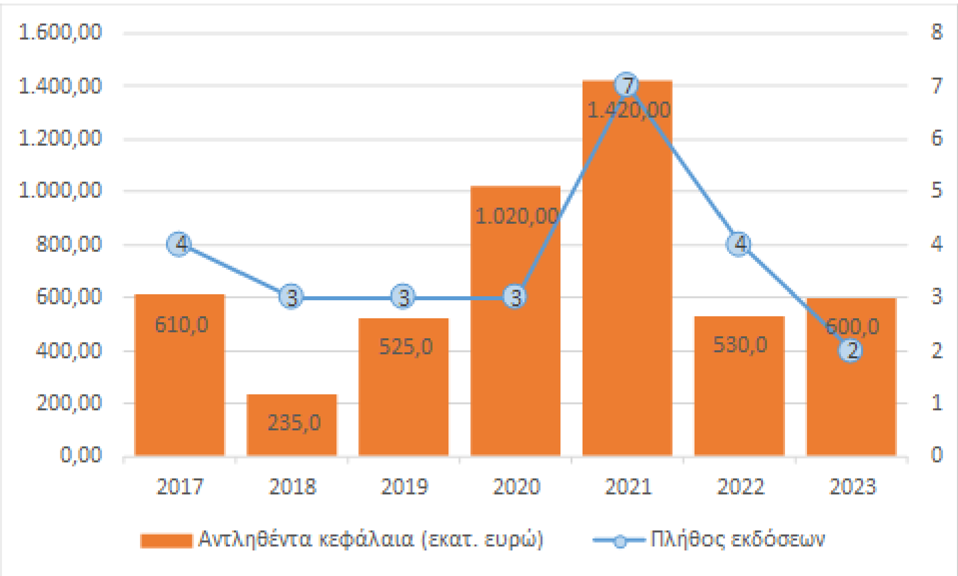
TABLE 19. Funds raised through corporate bond issuances, 2023

Company	Trading category	Total Funds Raised
	Issuance of new bonds by companies already listed in the ATHEX	
MYTILINEOS SA	Fixed-income securities	500,000,000.00
IDEAL HOLDINGS SA	Fixed-income securities	100,000,000.00
Total funds raised		**600,000,000.00**

Source: HCMC

Figure 8 presents annual data on corporate bond issuance during the period 2017-2023.

FIGURE 8. Total funds raised through corporate bond issuance (€ million), 2017-2023



Source: HCMC

Corporate restructuring in the capital market

In 2023, the corporate restructuring of companies listed in the Athens Exchange through mergers remained more or less unchanged.. More specifically, 8 listed companies absorbed through merger 13 non-listed companies and 2 listed companies in 2023 (Table 20 & Figure 9), while 2 listed companies had absorbed through merger 15 non-listed companies in 2022. Of the acquirer listed companies, 2 came from the Construction & Materials sector, 1 from the Technology sector, 1 from the Media sector, 1 from the

Financial Services sector, 1 from the Utilities sector, 1 from the Real Estate sector, and 1 came from the Banks sector.

Moreover, it should be noted that in 2023 corporate restructuring through spin-offs and acquisitions of business sectors remained more or less unchanged. More specifically, in 2023, 5 business sectors were spun-off from 5 ATHEX-listed companies and were acquired by 5 non-listed companies (Table 21), as compared to 6 spin-offs from 5 ATHEX-listed companies that were absorbed by 5 non-listed companies in 2022. The spin-offs that took place in 2023 concerned 2 companies from the Utilities sector, 1 from the Technology sector, 1 from the Consumer Products & Services sector, and 1 from the Financial Services sector.

Finally, on 31.12.2023, out of a total of 140 companies with shares and bonds listed in the Athens Exchange, 117 companies (83.6%) comprised groups and prepared consolidated financial statements, as compared to 120 companies comprising groups (82.2%) out of a total of 146 as per 31.12.2022 (Figure 10).

TABLE 20. Mergers among companies listed and non-listed in the ATHEX, 2023

No	Acquirer	Industry	Target Company
1	AUSTRIACARD HOLDINGS AG	TECHNOLOGY	-INFORM P. LYKOS SA HOLDING
2	ATTICA HOLDINGS S.A	MEDIA	ANEK SA
3	VIOCARPET SA	CONSTRUCTION & MATERIALS	- ALBIO DATA SA
4	ALPHA TRUST MFMF	FINANCIAL SERVICES	- ALPHA TRUST HELLENIC LAND S.A.
5	MYTILINEOS SA	UTILITIES	- WATT AND VOLT SA
6	I. KLOUKINAS-I. LAPPAS SA	CONSTRUCTION & MATERIALS	- IOANNIS KLOUKINAS – IOANNIS LAPPAS TECHNICAL COMPANY (real estate sector)
7	PREMIA SA	Real estate	- PREMIA ASPROPYRGOS DYO PEFKA SA - PREMIA ASPROPYRGOS RIKIA SA - MESSINIAKA AKINITA REAL ESTATE DEVELOPMENT COMPANY - ASPROPYRGOS INVESTMENT SA - ADAM-TEN REAL ESTATE DEVELOPMENT COMPANY - PIRAEUS REGENERATION ZONAS SA - THESMIA SA - VALOR PROPERTIES PRIVATE COMPANY
8	ALPHA SERVICES AND HOLDING SA	BANKS	- ALPHA INSURANCE BROKERAGE SA

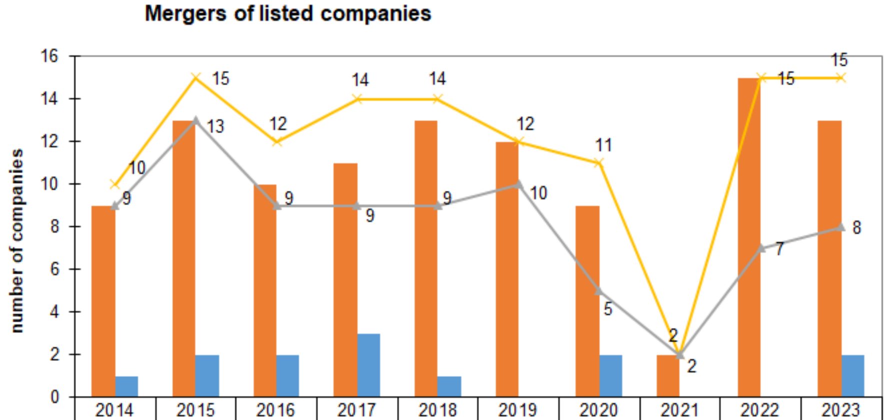
Source: HCMC

TABLE 21. Listed company business sector spin-offs and acquisitions by companies non-listed in the Athens Exchange, 2023

No	Listed Company	Industry	Company to which the business sector is transferred
1	INTPAKOM HOLDING S.A.	TECHNOLOGY	- INTPAKOM REAL ESTATE SA (real estate sector)
2	B&F GARMENT INDUSTRIES SA	CONSUMER PRODUCTS & SERVICES	- B AND SPLIT AE (Investment property sector)
3	MYTILINEOS SA	UTILITIES	- METKA SA (Infrastructure sector)
4	PPC SA	UTILITIES	- METALIGNITIKI SA (Postalignite Exploitation of Apologization Zone Cores (APZ) sector)
5	ALPHA TRUST MFMF	FINANCIAL SERVICES	- ALPHA TRUST SINGLE PERSON MFMF (Mutual Fund and Alternative Investment Fund Management, as well as provision of portfolio management, consultant and receipt and transmission of orders services sector)

Source: HCMC

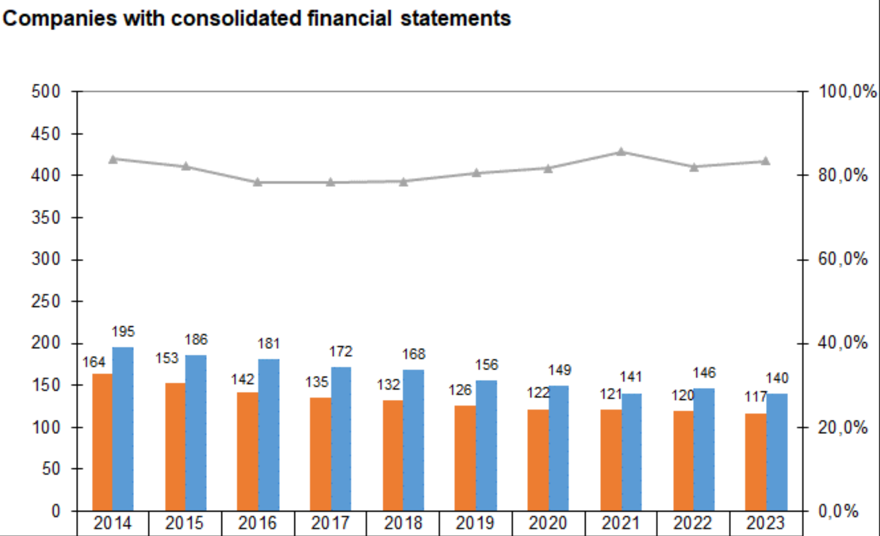
FIGURE 9. Mergers of ATHEX-listed Companies, 2014-2023



	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Non-listed acquired companies	9	13	10	11	13	12	9	2	15	13
Listed acquired companies	1	2	2	3	1	0	2	0	0	2
Acquired companies (total)	10	15	12	14	14	12	11	2	15	15
Listed companies - acquirer	9	13	9	9	9	10	5	2	7	8

Source: HCMC

FIGURE 10. Listed companies and groups of listed companies traded in the Athens Exchange, 2014-2023



	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Listed companies with consolidated financial statements	164	153	142	135	132	126	122	121	120	117
Total number of listed companies	195	186	181	172	168	156	149	141	146	140
Percentage %	84,1%	82,3%	78,5%	78,5%	78,6%	80,8%	81,9%	85,8%	82,2%	83,6%

Source: HCMC

PART THREE

CAPITAL MARKET INTERMEDIARIES

INVESTMENT FIRMS AND FINANCIAL INTERMEDIATION FIRMS

Trading activity

At the end of 2023, forty seven (47) investment firms licensed by the HCMC were operating in the Greek capital market, as compared to forty nine (49) in 2022 and forty six (46) in 2021. Moreover, twenty-one (21) Financial Intermediation Firms (FIFs) were operating as per 31 December 2023 as compared to twenty-two (22) in 2022 and 2021, and twenty-six (26) in 2020. The Hellenic Capital Market Commission, as the authority responsible for the supervision of the aforementioned companies, and as part of exercising its supervisory duties, performs regular audits on specific issues. Overall, in 2022 it performed 23 audits, of which 16 concerned investment firms (one of which comprised 52 complaints), 4 concerned banks, 1 concerned a tied agent of an investment firm from another member state, and 2 concerned exclusions of non-financial counterparties from the data reporting requirements of Regulation (EU) 648/2012 of the European Parliament and the Council on OTC derivatives, central counterparties and trade repositories (EMIR), as compared to 19 audits in 2022, of which 11 concerned investment firms (one of which comprised 92 complaints), 2 concerned banks, 2 concerned cases of provision of investment services without authorisation, and 4 concerned exclusions of non-financial counterparties from the data reporting requirements of EMIR.

Trading activity of investment firms in equity instruments listed in the Athens Exchange increased year-on-year to 45.09 billion euros, as compared to 29.99 billion euros in 2022, 28.69 billion euros in 2021 and 26.36 billion euros in 2020. Their share in the total value of trading of all companies-members of the ATHEX (Investment Firms, Banks, and remote members) stood at 82.24% as compared to 83.21% in 2022, 82.12% in 2021 and 82.52% in 2020.

The share of the five ATHEX members with the largest value of trading as a percentage of the total value of trading, all five of which are Investment Firms, stood at 69.03% as compared to 69.21% in 2022, 67.04% in 2021 and 65.57% in 2020. Similarly, the share of the ten-largest, in terms of trading activity, members of the Athens Exchange increased to 88.84% from 87.25% in 2022, 86.42% in 2021 and 84.35% in 2020.

TABLE 22. Trading by firms-members of the Athens Exchange, 2019-2023.

Trading by ATHEX members (€ mn)	2023	2022	2021	2020	2019
Value of Equity Trading	54,833.13	36,038.41	34,947.73	31,944.18	32,740.40
Value of Bond Trading	443.46	489.24	537.28	383.95	493.64
Total Trading Value	55,276.59	36,527.65	35,485.01	32,328.13	33,234,04
Share (%) of top-5 ATHEX members	69.03	69.21	67.04	65.57	62.91
Share (%) of top-10 ATHEX members	88.84	87.25	86.42	84.35	81.5

Source: ATHEX

Margin Account Trading

Table 23 presents the development of margin account trading for the year 2023, according to data submitted by investment firms to the Hellenic Capital Market Commission on the last trading day of each month. The average (monthly) number of firms actually active in this field stood at 23, while 30 firms submitted the relevant notification. The average number of active open-end contracts was slightly reduced to 11,021, as compared to 11,048 in 2022, 11,104 in 2021, 11,170 in 2020, and 11,290 in 2019, while they were only 4,866 in 2018 and 11,545 in 2017 (6,225 in 2016 and 6,943 in 2015). Total average debit balances in margin accounts rose to 82.25 million euros from 62.36 million euros in 2022, 60.65 million euros in 2021 and 46.35 million euros in 2020, and as compared to 51.16 million euros in 2019, 36.39 in 2018 and 42.12 million euros in 2017 (19.67 million euros in 2016 and 36.32 million euros in 2015), while the average value of security portfolios stood at 1,469.74 million euros, as compared to 1,084.22 million euros in 2022, 978.30 million euros in 2021, 672.82 million euros in 2020, 728.17 million euros in 2019, 639.66 million euros in 2018 and 599.85 million euros in 2017 (453.66 million euros in 2016 and 668.25 million euros in 2015).

TABLE 23. Margin Account Trading, 2023

Month	Number of margin account trading notifications by investment firms	Number of Investment Firms actually providing margin account trading	Number of active open-end margin agreements	Number of active short term margin agreements	Debit balances (in € thousands)	Security Portfolio Valuation (in € thousands)
Dec.	27	23	10.327	40.154	101,592.40	1,917,841.78
Nov.	27	23	11.161	39.715	97,296.26	1,260,362.83
Oct.	27	23	11.158	39.313	87,362.50	1,204,482.06
Sep.	27	23	11.164	39.247	95,923.15	1,628,580.40
Aug.	27	23	11.143	39.383	112,482.73	1,259,950.83
Jul.	27	23	11.109	39.325	94,368.42	1,686,138.73
Jun.	27	23	11.098	41.270	86,929.15	1,784,235.46
May	28	24	11.057	40.987	70,441.84	1,669,119.97
Apr.	28	24	11.033	51.922	64,074.02	1,291,796.67
Mar.	28	24	10.989	51.925	61,198.23	1,324,615.90
Feb.	28	23	10.987	49.667	59,373.51	1,375,775.62
Jan.	28	24	11.027	51.874	56,013.57	1,233,946.91
Mean	**27**	**23**	**11.021**	**43.732**	**82,254.65**	**1,469,737.26**

Source: HCMC

COLLECTIVE INVESTMENT MANAGEMENT FIRMS

Collective Investments in Transferable Securities (UCITS)

In 2023, the total number of mutual fund management companies (MFMCs) stood at 13. The total number of mutual funds under management increased and stood at 402 at the end of the year, of which 195 were granted formation approval by the Hellenic Capital Market Commission, as compared to and 153 mutual funds in 2022. The Hellenic Capital Market Commission, as the authority responsible for the supervision of the aforementioned companies, and as part of exercising its supervisory duties, performed eleven (11) audits in undertakings for collective investment on securities during 2023.

At the end of the year, the total net assets of mutual funds increased by 45.13% year-on-year and stood at 15,795.25 million euros, as compared to 10,883.1 million euros in 2022 and 11,125.9 million euros in 2021. According to the classification of mutual funds, MFMCs managed 88 equity mutual funds, 136 *bond mutual funds, 57 balanced mutual funds, 40 equity funds of funds, 43 balanced funds of funds, 5 bond funds of funds, 21 specialist mutual funds, and 12 Variable NAV money market funds.*

The three largest mutual fund management companies had funds under management of 10,867.78 million euros, which accounted for 68.80% of total mutual fund assets, as compared to assets of 7.43 billion euros and a market share of 70.2% in 2022, and 7.63 billion and 68.56% in 2021. Similarly, the five largest MFMCs had funds under management of 14,278.28 billion euros that accounted for 90.39% of total mutual fund assets, as compared to 90.4% in 2022 and 78.53% in 2021.

TABLE 24. Net assets and Number of Mutual Funds, 2021-2023.

MF Classification	31.12.2023 Value (€ mn)	No of M/F	31.12.2022 Value (€ mn)	No of M/F	31.12.2021 Value (€ mn)	No of M/F
Money market						
Bond	6,510.78	136	3,116.92	111	3,437.52	105
Equity	2,356.68	88	1,639.15	82	1,706.25	87
Balanced	3,141.06	57	2,717.93	50	2,530.19	50
Funds of Funds	2,355.22	88	2,496.84	82	2673.65	86
Specialist	654.26	21	513.11	18	420.1	15
VNAV MMFs	777.5	12	399.15	9	358.26	9
Total	15,795.25	402	10,883.10	352	11,125.94	352

Source: Hellenic Fund & Asset Management Association

TABLE 25. Net Mutual Funds Assets and macroeconomic aggregates, 2010-2023

Date	Resident deposits and repurchase agreements of non MFIs to other MFIs in Greece (€ mn)[1]	ATHEX Market Capitalisation (Total shares) (€ mn)	Net Mutual Funds Assets (€ mn)
Dec. 2023	217,231	87,514.31	15,795.52
Dec. 2022	212,470	65,861.95	10,883.1
Dec. 2021	201,352	66,078.32	11,125.94
Dec. 2020	181,987	53,853.00	8,093.73
Dec. 2019	166,856	61,217.27	7,859.50
Dec. 2018	159,474	44,884.04	6,059,95
Nov. 2018	154.71	45,731.51	6,201,04
Dec. 2017	144,256	54,055.35	6,656.9

Date	Resident deposits and repurchase agreements of non MFIs to other MFIs in Greece	ATHEX Market Capitalisation (Total shares)	Net Mutual Funds Assets
	(€ mn)[1]	(€ mn)	(€ mn)
Dec. 2016	140,213	45,101.80	6,421.3
Dec. 2015	140,212	46,717.67	7,238.6
Dec. 2014	186,631	52,916.45	6,047.3
Dec. 2013	190,457	66,514.89	6,252.5
Dec. 2012	191,198	33,739.32	5,947.7
Dec. 2011	202,193	26,783.43	5,229.1
Dec. 2010	247,188	53,958.38	8,015.6

Source: Bank of Greece, ATHEX, Hellenic Fund & Asset Management Association

Note 1. Securitisation obligations are not included

As far as individual mutual fund categories are concerned, the net assets of bond mutual funds stood at 6,510.78 million euros, registering a y-o-y increase of 108.88%, as compared to a 9.32% drop in 2022. Their market share rose to 41.21% of the total mutual fund market at the end of 2023, from 28.70% in 2022 and 30.90% in 2021, while their annual return was positive at 5.64%, as compared to a negative return of 9.32% in 2022.

The net assets of equity mutual funds stood at 2,356.68 million euros, increased by 43.77% year-on-year, and registering a positive y-o-y return of 23.12%, as compared to a distribution of mutual fund assets in net assets by 2.61% and a negative annual return of 3.6% in 2022. The market share of equity mutual funds stood at 14.92% as per 31.12.2023, as compared to 15.10% in 2022 and 15.33% in 2021. It should be noted that the ATHEX Composite Share Price Index gained 39.08% y-o-y, the FTSE/ATHEX Large Cap Index gained 38.70% and the FTSE/ATHEX Market Index gained 38.47%.

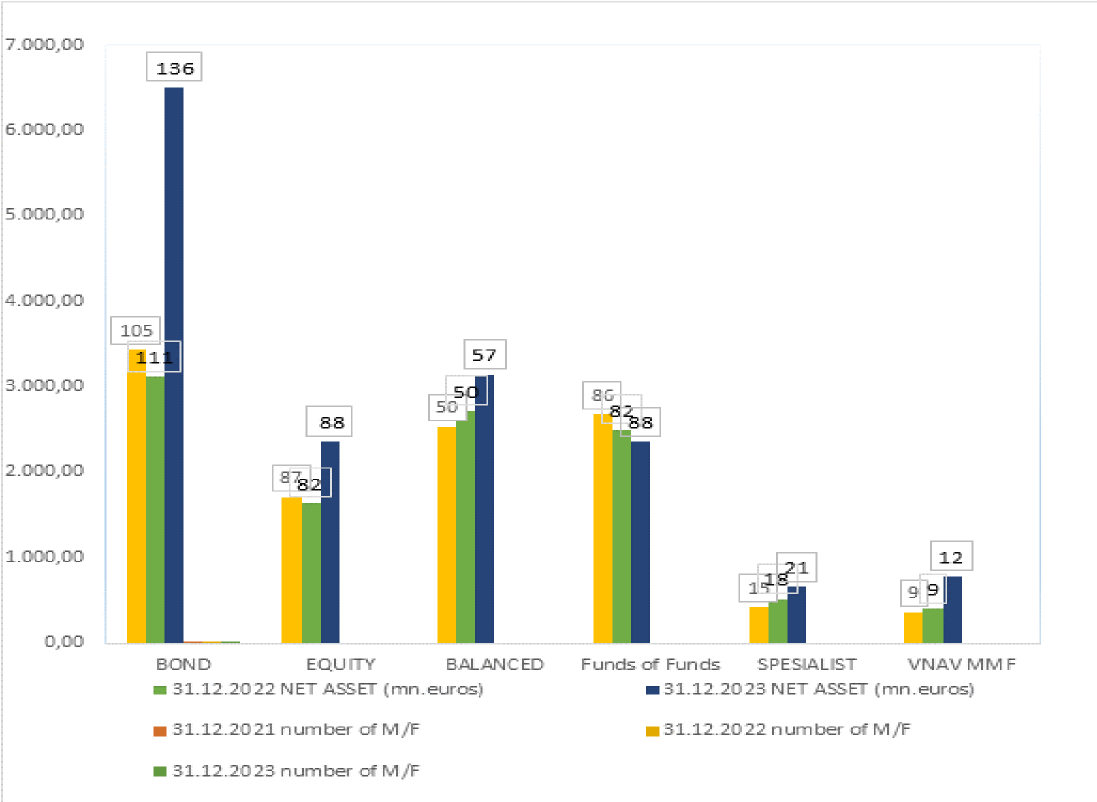
The net assets of balanced mutual funds increased by 15.56% year-on-year to 3,141.06 million euros, as compared to a 6.46% increase in 2022, while their market share as per 31.12.2023 accounted for 19.88% of the total mutual fund market, as compared to 25% in 2022 and 22.74% in 2021. Their annual returns were positive, at 16.20%, as compared to negative annual returns of 6.88% in 2022.

The net assets of funds of funds as a whole stood at 2,355.22 million euros at the end of the year, reduced by 5.67% year-on-year, after a 6.61% decrease in 2022. Funds of funds as a whole accounted for 14.91% of the total mutual fund market as per 31.12.2023, as compared to a market share of 23% in 2022, and 24.03% in 2021. Equity funds of funds saw their net assets increase by 6.24%, while their annual returns were positive at 8.38%, as compared to significant net asset reduction of 9.77% and a negative annual return of 14.15% in 2022. Balanced funds of funds saw their net assets decrease by 10.48%, while their annual returns were positive at 6.40%, as compared to a 5.10% decrease in net *assets and a negative annual return of 10.68% in 2022. Bond funds of funds saw their net assets decrease by 19.27%, while their annual returns were positive at 3.12%, as compared to net asset reduction of 12.31% and a negative annual return of 8.84% in 2022.*

The net assets of specialist mutual funds increased by 27.50% year-on-year to 654.26 million euros, as compared to a 22.15% increase in 2022, while their market share as per 31.12.2023 accounted for 4.14% of the total mutual fund market, as compared to 4.8% in 2022 and 3.78% in 2021. The annual return of Absolute Return specialist mutual funds and specialist mutual funds was positive at 5.03%.

In 2023, all mutual funds registered net year-on-year inflows, which amounted to 3,183.72 million euros, as compared to net inflows of 610.76 million euros in 2022 and 2,493.21 billion euros in 2021. As regards individual mutual fund categories, net inflows were registered by Variable net asset value (VNAV) MMFs (365.22 million euros), specialist funds (110.15 million euros), equity funds (108.28 million euros) and bond funds (3,009.88 million euros), while net outflows were registered by funds of funds (-321.58 million euros), and balanced funds (-88.23 million euros).

FIGURE 11. Net assets and Number of Mutual Funds per MF classification, 2021-2023



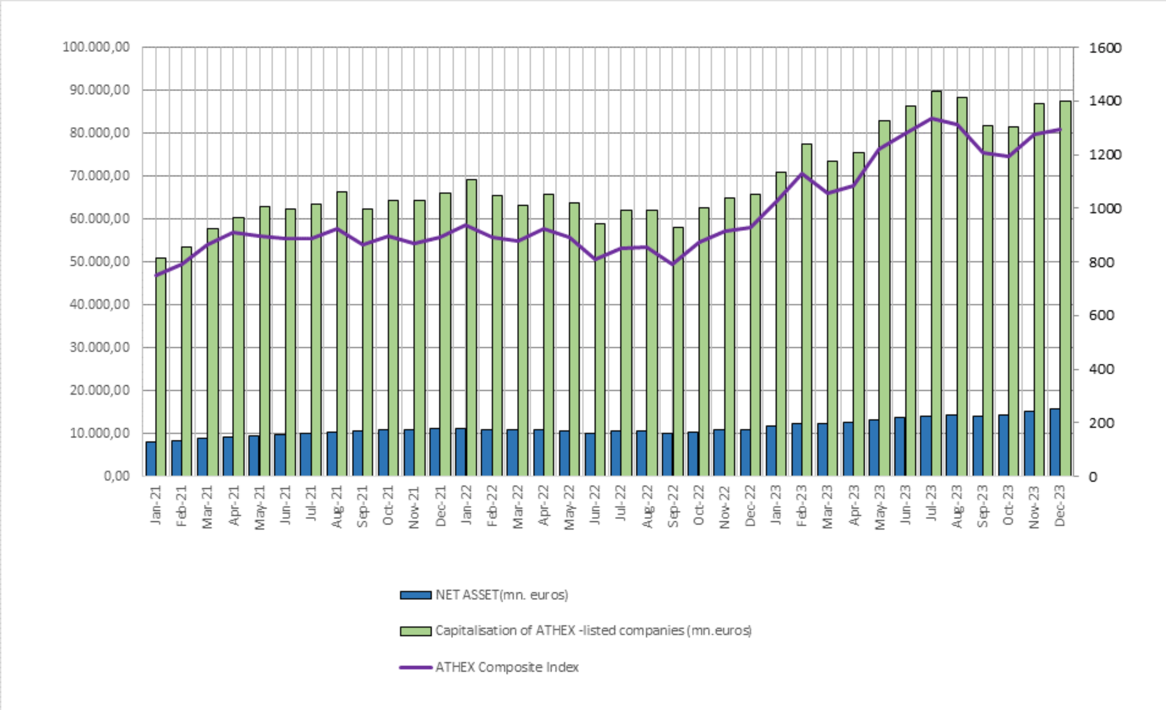
Source: Hellenic Fund & Asset Management Association

TABLE 26. Net Assets and Number of Units in Mutual Funds, 31.12.2023

MF Classification	Net Assets 31.12.2023 (€)	Change y-o-y (%)	No. of units 31.12.2023	Change y-o-y (%)
Bond	6,510,784,372.39	91.70%	811,425,450.49	25.63%
Equity	2,356,687,201.26	15.95%	556,731,627.15	-75.48%
Balanced	3,141,062,363.60	14.17%	306,783,270.79	-1.81%
Bond Funds of Funds	57,185,390.22	-19.27%	4,917,174.06	-22.66%
Equity Funds of Funds	711,871,219.46	6.24%	155,162,165.25	0.00%
Balanced Funds of Funds	1,586,164,780.40	-10.48%	384,010,833.74	-13.95%
Specialist	654,260,986.11	27.18%	197,556,550.42	19.53%
VNAV MMFs	777,509,320.66	94.79%	179,173,700.32	180.44%

Source: Hellenic Fund & Asset Management Association

FIGURE 12. ATHEX Market Capitalisation - Mutual fund assets and the ATHEX Composite Index, 2021-2023



Source: Athens Stock Exchange, Hellenic Fund & Asset Management Association.

In 2023, foreign Undertakings for Collective Investments in Transferable Securities (UCITS), notified the HCMC about their intention to sell mutual fund units in the Greek market in ninety three (93) cases, while eleven (11) new foreign UCITS offered notification concerning the sale of mutual fund units.

TABLE 27. Authorised foreign Undertakings for Collective Investments, 2004-2023

Year	UCITS (covered by Directive 85/611/EEC)		UCITS (not covered by Directive 85/611/EEC)	
	Number of UCITS	Number of Funds	Number of UCIs	Number of Funds
2023	11	93	0	0
2022	8	113	0	0
2021	9	93	0	0
2020	12	101	0	0
2019	6	144	0	0
2018	4	76	0	0
2017	11	91	0	0
2016	21	100	0	0
2015	2	109	0	0
2014	7	116	0	0
2013	1	115	0	0

Year	UCITS (covered by Directive 85/611/EEC)		UCITS (not covered by Directive 85/611/EEC)	
2012	2	75	0	0
2011	4	121	0	0
2010	10	98	0	0
2009	10	168	0	0
2008	9	369	0	0
2007	9	206	0	0
2006	6	328	0	0
2005	5	159	0	0
2004	12	92	0	0

Source: HCMC

Alternative Investments (PICs, AIFMs, REICs)

In 2023, there was one Portfolio Investment Company (PIC) in operation. Its net assets stood at 24.68 million euros at the end of 2023, as compared to 24.68 at the end of 2022, 15.10 million euros at the end of 2021 and 12.69 million euros at the end of 2020, and its shares where traded in the Securities Market of the Athens Exchange at a -22.8% discount.

Moreover, there were ten (10) active Real Estate Investment Companies (REICs), eight (8) of which are listed in the Athens Exchange. At the end of 2023, the total value of the investment portfolio of six (6) out of these ten (10) companies stood at 2,751.98 million euros, as compared to 2,877.02 million euros for nine companies at the end of 2022, 2,693.14 million euros in 2021, and 2,304.71 million euros in 2020, while the value of properties under management by nine out of 10 companies stood at 3,487.11 million euros at the end of 2023, as compared to 3,283.50 million euros in 2022, 2,542.69 million euros in 2021, and 2,221.12 million euros at the end of 2020.

Moreover, ten (12) alternative investment fund management companies (AIFMCs) were operating at the end of the year, managing 15 Alternative Investment Funds and their net asset value stood at 532.67 million euros at the end of the 2023, as compared to 427.20 million euros in 2022, 537.45 million euros in 2021 and 396.25 million euros in 2020. In addition, one audit was performed on one AIFM.

Finally, ten (23) alternative investment fund managers (AIFMs) were operating at the end of the year, managing 25 Alternative Investment Funds and their net asset value stood at 313.47 million euros at the end of the 2023, as compared to 266.31 million euros in 2022, 232.10 million euros in 2021 and 165.63 million euros in 2020.

OCCUPATIONAL INSURANCE FUNDS

The Hellenic Capital Market Commission is one of the country's three occupational fund supervisory authorities, responsible for the supervision of investments performed by Occupational Insurance Funds (OIFs) and Institutions for Occupational Retirement Provision (IORPs).

More specifically, it is responsible for the assessment of fitness and propriety of the Investment Committee,, the supervision of investment policies and procedures, as well as the provision of correct information to insured persons and beneficiaries regarding the investments, the appointment of an investment management company and the appointment of a custodian. Moreover, within the scope of its responsibilities, it performs on-site, sample, ad hoc or general audits, investigates complaints, and reviews terms and conditions for the cross-border activity and the cross-border transfer of IORPs. It monitors developments regarding the standards set by international organisations in the field of occupational insurance and participates as the technical advisor to the Ministry of Labour and Social Affairs in the preparation of regulations pertaining to occupational insurance. It issues decisions and circulars on issues that do not require cooperation from the other Competent Authorities.

The review of the data submitted by Occupational Insurance Funds as part of the exercise for monitoring the evolution of the OIFs' assets, produced the following findings:

1. 1) The Assets of ***31 Occupational Insurance Funds*** *(excluding real estate), the reference date being 31.12.2023, amount to €2,139,566,760, increased by 18.01% year-on year.*

2. The assets of 4 Compulsory Occupational Insurance Funds, the reference date being 31.12.2023 amount to €1,756,413,536, reduced by 13.67% year-on-year, and account for 82.09% of the total assets of OIFs.

3. The assets of IORPs Funds, the reference date being 31.12.2023, amount to €383,153,224, increased by 43.04% year-on-year, and account for approximately 17.91% of the total assets of OIFs. The creation of new IORP-OIFs is conducive to the growth of the total assets of IORP-OIFs, a case in point being that the OIFs of the Alpha Bank Group and the Athens Medical Association submitted data for the first time during 2023.

4) Based on the data submitted by OIFs, the weighted average return of assets under management in 2023 stood at approximately 9.5%. The aforementioned return is indicative of the course of investments, it should be noted, though, that the Strategic Allocation of Investments differs from Fund to Fund, and in order to draw conclusions on the performance of a Fund's investments, it should be compared with the return of the Composite Benchmark chosen by this specific Fund.

TABLE 28. List of Occupational Insurance Funds

No	OCCUPATIONAL INSURANCE FUNDS
1	OCCUPATIONAL INSURANCE FUND FOR ASSISTANCE TO INSURERS AND PERSONNEL OF INSURANCE COMPANIES (TEA-EAPAE, legal person governed by private law)
2	OCCUPATIONAL INSURANCE FUND FOR FOOD TRADE EMPLOYEES (TEAYET, legal person governed by private law)
3	OCCUPATIONAL INSURANCE FUND FOR PHARMACEUTICAL EMPLOYEES (TEAYFE, legal person governed by private law)
4	SUPPLEMENTARY OCCUPATIONAL INSURANCE FUND FOR PERSONNEL OF PETROLEUM COMPANIES (ETEAPEP, legal person governed by private law)
5	PIRAEUS BANK'S GROUP PERSONNEL INSTITUTION FOR OCCUPATIONAL RETIREMENT, LIFE AND MEDICAL PROVISION
6	OCCUPATIONAL INSURANCE FUND FOR POLICE OFFICERS, FIREFIGHTERS AND COAST GUARD OFFICERS (TEAAAPL, a legal person governed by private law)
7	OCCUPATIONAL PENSION FUND OF THE PERSONNEL OF INTERAMERICAN (TEA INTERAMERICAN-legal person governed by private law)
8	OCCUPATIONAL INSURANCE FUND OF AIR TRAFFIC CONTROLLERS OF GREECE (TEA EEKE -legal person governed by private law)
9	OCCUPATIONAL INSURANCE FUND OF JOHNSON & JOHNSON, JOHNSON & JOHNSON CONSUMER AND JANSSEN–CILAG EMPLOYEES (TEA J&J/JC-legal person governed by private law)
10	OCCUPATIONAL INSURANCE FUND FOR ECONOMISTS (ETAO, legal person governed by private law)
11	INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION OF EUROBANK GROUP PERSONNEL –legal person governed by private law) “IORP EUROBANK’S GROUP PERSONNEL”
12	OCCUPATIONAL INSURANCE FUND OF THE MEDICAL CHAMBER OF THESSALONIKI (TEAISTh - legal person governed by private law)
13	OCCUPATIONAL INSURANCE FUND OF THE HELLENIC POST (TEA ELTA, legal person governed by private law)
14	OCCUPATIONAL INSURANCE FUND OF BETA CAE SYSTEMS S.A. - legal person governed by private law (TEA BETA CAE SYSTEMS)
15	OCCUPATIONAL PENSION FUND OF THE INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS OF GREECE (TEA SOEL - legal person governed by private law)
16	OCCUPATIONAL PENSION FUND OF INTRUM HELLAS AND INTRUM HELLAS REO SOLUTIONS
17	ACCENTURE’S PERSONNEL INSTITUTION FOR OCCUPATIONAL RETIREMENT, LIFE KAI MEDICAL PROVISION

No	OCCUPATIONAL INSURANCE FUNDS
	(TEA ACCENTURE legal person governed by private law)
18	*OCCUPATIONAL PENSION FUND OF TSAKOS MARITIME ENTERPRISES & ASSOCIATES (TEA TSAKOS GROUP - legal person governed by private law)*
19	*OCCUPATIONAL INSURANCE FUND OF GEOTECHNICAL CHAMBER MEMBERS (TEAGE - legal person governed by private law)*
20	*INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION OF ATHENS INTERNATIONAL AIRPORT S.A. PERSONNEL (TEA AIA - legal person governed by private law)*
21	*OCCUPATIONAL INSURANCE FUND OF ATHENS EXCHANGE GROUP EMPLOYEES - legal person governed by private law*
22	*OCCUPATIONAL INSURANCE FUND OF THE MINISTRY OF FINANCE (TEA YPOIK)*
23	*INTERAMERICAN INSURANCE INTERMEDIARIES OCCUPATIONAL PENSION FUND - legal person governed by private law*
24	*OCCUPATIONAL PENSION FUND OF INTERLIFE AAEGA legal person governed by private law*
25	*OCCUPATIONAL PENSION FUND OF THE HELLENIC FUND AND ASSET MANAGEMENT ASSOCIATION (TEA-ETHE - legal person governed by private law)*
26	*OCCUPATIONAL PENSION FUND FOR URBAN TRANSPORT PASIAL & EA (TEA PASIAL & EA - legal person governed by private law)*
27	*INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION OF EUROLIFE FFH –legal person governed by private law*
28	*OCCUPATIONAL PENSION FUND OF HELLENIC CIVIL AVIATION AUTHORITY (TEA YPA - legal person governed by private law)*
29	*INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION FOR EMPLOYEES AND ASSOCIATES OF DYNAMIS AND GENKA*
30	*INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION OF MEDICAL ASSOCIATION OF ATHENS MEMBERS AND PERSONNEL –legal person governed by private law) (IESP-TEA ISA)*
31	*INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION OF ALPHA SERVICES AND HOLDINGS GROUP PERSONNEL –legal person governed by private law)*

TRADING VENUES – CENTRAL COUNTERPARTIES – DEPOSITORIES

The Hellenic Capital Market Commission, as part of its mandate, supervises trading venues, central counterparties and depositories. All these agencies are licensed and supervised in accordance with EU *legislation, which in the case of trading venues is Directive 2014/65/EU (MiFID II), as transposed into Greek legislation by L. 4514 (Government Gazette A 14/30.1.2018), and Regulation (EU) 600/2014, in the case of central counterparties is Regulation 648/2012 (EMIR), and in the case of depositories is Regulation (EU) 909/2014 (CSDR). In Greece, there are four regulated markets in operation (the Securities Market of the Athens Exchange, the Derivatives Market of the Athens Exchange, the Derivatives Market of the Energy Exchange and the Electronic Secondary Government Bonds Market of the Bank of Greece), along with a multilateral trading facility (the Alternative Market of the Athens Exchange), a central counterparty (the Athens Exchange Clearing House) and the Hellenic Central Securities Depository. The supervision of these agencies is both prudential and related to control and sanctions. Prudential supervision consists of the performance of preemptive audits pertaining to compliance with the laws under which each agency has been licensed, while control and sanctions apply when there are complaints or events that indicate possible non compliance with the applicable laws, in which case ad hoc audits are performed in order to ascertain a potential violation. In 2023, compliance audits we conducted in regard to ATHEXClear and ATHEXCSD. In accordance with article 21 of Regulation 648/2012 (EMIR) competent authorities review the arrangements, strategies, processes and mechanisms implemented by CCPs (ATHEXClear) to comply with the Regulation. Moreover, they evaluate the risks, focusing on financial and operational risks, to which CCPs are, or might be, exposed. ATHEXClear is evaluated on an annual basis and the results of the evaluation are presented to the college. In 2023, the first annual review of ATHEXCSD was completed, in accordance with Regulation 909/2014 on central securities depositories (CSDR), following its authorisation. In accordance with article 22 of Regulation 909/2014 (CSDR) the competent authority reviews the arrangements, strategies, processes and mechanisms implemented by the Central Securities Depository with respect to compliance with this Regulation and evaluate the risks to which the CSD is, or might be, exposed or which it creates for the smooth functioning, or the stability, of securities markets*

PART FOUR

ACTIVITIES OF THE HELLENIC CAPITAL MARKET COMMISSION

RULES AND REGULATIONS

In 2023, the Board of Directors of the Hellenic Capital Market Commission, having the competence, issued the following Decisions, which were directed towards ensuring the proper provision services and investor protection, as well as market transparency and the orderly operation of the capital market.

Collective Investments (Investment Funds, Management Companies, OIFs)

3/981/16.3.2023 *(Government Gazette B 2101/31.3.2023) Suspension of the redemption of UCITS shares on 7 & 10 April 2023.*

Trading, Clearing, Settlement

1/992/4.8.2023 *(Government Gazette B 5024/9.8.2023) Approval of amendment to the Rulebook of the Athens Exchange.*

3/1000/31.10.2023 *(Government Gazette B 6249/31.10.2023) Approval of amendment to the Rulebook of the Hellenic Central Securities Depository.*

Provision of investment Services

4/982/30.3.2023 *(Government Gazette B 2323/12.4.2023) extension of the deadline set out in article 10 of HCMC Decision 1/506/8.4.2009 "Prevention of the use of the financial system for the purpose of money laundering and terrorist financing."*

16/1007/21.12.2023 *(Government Gazette B 7769/31.12.2023) Registration of tied agents of Investment Firms, FIFs, MFMFs, and AIFMs with extended purpose.*

LICENSING

The work of the Hellenic Capital Market Commission in the field of licensing during 2023 includes the following:

Investment Firms

- *Authorisation of the operation of Investment Firms in one (1) case.*

- *Approval of the extension of Investment Firm operations in two (2) cases.*
- *Assessment of the fitness and propriety of new Investment Firm board members in eighteen (18) cases.*
- *Assessment of the fitness and propriety of the actual managers of Investment Firms in eight (8) cases.*
- *Approval of qualified holdings in Investment Firms in six (6) cases.*
- *Approval of share capital decreases of Investment Firms in three (3) cases.*

Financial Intermediation Firms

- *Assessment of the fitness and propriety of new Financial Intermediation Firm board members two (2) cases.*
- *It should be noted that the number of FIFs as per 31.12.2023 stood at twenty-one (21) as compared to twenty-two (22) on 31.12.2022.*

Mutual Fund Management Companies

- *Number of operating MFMCs (31.12.2022): Thirteen (13).*
- *Approval of charter modification in three (3) cases.*
- *Approval of the qualifying holdings in MFMCs in five (5) cases.*
- *Total number of UCITS under management that have been granted licenses by the Hellenic Capital Market Commission: one hundred and ninety-five (195).*
- *Approval of the regulations and the formation of mutual funds in thirty eight (38) cases.*
- *Approval of the modification of mutual fund internal regulations in eleven (11) cases.*
- *Granting of license for merger between mutual funds in in five (5) cases.*
- *Approval of the new composition of the board of directors in seven (7) cases.*
- *Approval of share capital modification in one (1) case.*

Portfolio Investment Companies

- *Number of operating PICs (31.12.2023): One (1).*
- *Approval of charter modification in one (1) case.*

Real Estate Investment Companies

- *Number of operating REICs (31.12.2023): Nine (9).*
- *Approval of the new composition of the board of directors in seven (7) cases.*
- *Approval of charter modification in eight (8) cases.*
- *Approval of share capital changes in five (5) cases.*

Alternative Investment Fund Managers

In addition to the Real Estate Investment Companies (REICs) and the Portfolio Investment Company (PIC), which are also AIFMs:

- *Number of operating AIFMs (31.12.2023): Thirteen (13), of which five (5) are also MFMCs.*
- *Total number of AIFs under management by AIFMs: eighteen (18)*

EU UCITS

- *EU UCITS operating on 31.12.2023: one hundred and seven (107).*
- *Receipt of notification concerning the sale of shares in new EU UCITS in eleven (11) cases.*
- *Active compartments of EU UCITS as per 31.12.2023: one thousand four hundred and thirty (1,430).*
- *Receipt of notification concerning the sale of new funds by EU UCITS (compartments) in ninenty three (93) cases.*
- *Receipt of notification concerning the cessation of operation of EU UCITS registered in Greece in six (6) cases.*
- *Receipt of notification concerning the cessation of operation of EU UCITS funds (compartments) registered in Greece in seventy-eight (78) cases.*

Trading venues and clearing and settlement systems

- *1/992/4.8.2023 (Government Gazette B 5024/9.8.2023) Approval of amendment to the Rulebook of the Athens Exchange.*
- *3/1000/31.10.2023 (Government Gazette B 6249/31.10.2023) Approval of amendment to the Rulebook of the Hellenic Central Securities Depository.*

Approval of Prospectuses for the Public Offering of Transferable Securities and other corporate actions. Exemption and Union Scope of Prospectuses

Listed Company Prospectuses for Public Offerings and/or listing of transferable securities

- *Approval of the prospectuses of three (3) companies and one (1) supplementary prospectus, concerning the public offering of shares aimed at share capital increases in favour of existing shareholders by payment of cash, and their listing in the securities market of ATHEX.*
- *Approval of the Prospectuses of two (2) companies, concerning the public offering of bonds and their admission to trading in the securities market of the Athens Exchange.*
- *Approval of the prospectus of one (1) company, concerning the listing of warrants and the stock resulting from their conversion, in the securities markets of the Athens Exchange.*
- *Approval of the Prospectuses of two (2) companies, concerning the public offering of already existing listed shares.*

Prospectuses for the initial public offering and/or listing of transferable securities (L. 3371/2005).

- *Approval of the prospectuses of three (3) companies, concerning the initial public offering and listing of shares in the securities markets of the Athens Exchange.*
- *Approval of the prospectus of one (1) company, concerning the public offering of its stock for trading in the securities markets of the Athens Exchange andthe Vienna Stock Exchange..*

Exemptions from the obligation to publish a prospectus (Article 1, paragraphs 4-5 of Regulation (EU) 2017/1129).

- *Receipt of Notification of seventeen (17) forms provided for by article 1 of Regulation (EU) 2017/1129 concerning share capital increases and/or the conversion to shares of stock options offered to company employees.*
- *Receipt of Notification of five (5) forms provided for by article 1 of Regulation (EU) 2017/1129 concerning a share capital increase through the distribution of free shares to existing shareholders and dividends paid in the form of the distribution of shares of the same type with those on which the dividend is paid.*

Cross-border offers and admissions to trading (Articles 24-26 of Regulation (EU) 2017/1129).

- *Receipt of Notification of twenty-three (23) prospectuses and base prospectuses, eighty-six (86) supplements to prospectuses, three (3) registration documents, eight (8) securities notes, and eight (8) final terms and the corresponding certificates of approval by the national competent authorities,* *in the context of the Union scope of approvals of prospectuses, in accordance with articles 24, 25 & 26 of Regulation (EU) 2017/1129.*

ENFORCEMENT AND COMPLIANCE

During 2023, the Hellenic Capital Market Commission continued its supervisory work in all areas. The audits that were performed covered all capital market entities (including investigations of market abuse). In this context the Hellenic Capital Market Commission monitors the behaviour of all supervised entities, listed companies, persons intermediating in transactions, market managers (Athens Exchange, HDAT) and, in general, market participants, as regards compliance with the provisions on market abuse.

To this end, the Hellenic Capital Market Commission:

- *evaluates and further investigates, whenever deemed necessary, investor complaints as well as the suspicious transaction and order reports (STORs) that must be submitted by persons intermediating in transactions and market managers, on issues pertaining to market manipulation and/or insider trading. For example, in 2023 the Hellenic Capital Market Commission received and completed the evaluation of 29 STORs and 5 complaints pertaining to market abuse.*

    - *monitors transactions in order to find indications of market abuse and performs, whenever deemed necessary, thorough audits to establish the relevant violations. Indicatively, in 2023 the Hellenic Capital Market Commission investigated more than 70 cases in order to detect of evidence of market abuse, all of which have been completed in regard to the detection or otherwise of evidence of market abuse,*
    - *and completed the audits of 6 cases concerning other provisions of MAR (excluding market abuse), while it completed 9 audits of previous year transactions, with the audit of another 8 cases being in progress;*
    - *monitors compliance of listed companies, their managers, as well as all market participants, with the provisions of Regulation 596/2014 on market abuse*
    - *responds to queries concerning the proper implementation of the legislation*
    - *issues explanatory circulars and sends explanatory letters, whenever deemed necessary, to ensure the proper compliance of all supervised persons.*
    - *conducts meeting with Investment Firms and the Athens Exchange, with which it is closely cooperating in order to ensure the orderly operation of the market.*
    - *participates in ESMA working groups for the optimisation and reform of existing market abuse legislation.*

- *was actively involved in the creation of a new SSR application for the reporting of net short positions.*
- *was actively involved in the establishment of specifications for upgrading the market supervision IT system.*

Moreover, in the context of its supervisory work, the HCMC performs systematic audits of supervised persons, as detailed in the following chapters. In 2023, there were multiple audits on investment firms, mutual fund management firms, financial intermediation firms, listed companies, and stock exchange transactions. The audits detected violations of capital market regulations, which led the Hellenic Capital Market Commission to the imposition of administrative sanctions.

Revoking of License

- *Revoking of the operating license of Investment Firms in two (2) cases.*
- *Revoking of the license of one (1) Financial Intermediation Firm in implementation of article 8 of Law 4514/2018.*

Supervision & Monitoring of the Behaviour of Listed Companies

The Hellenic Capital Market Commission supervises the companies the securities of which are listed on a regulated market.

A. Continuous Disclosure

The Hellenic Capital Market Commission oversees and controls the companies' compliance: a) with obligations concerning continuous disclosure to investors as regards the companies themselves, as well as their subsidiaries, their executives, and their shareholders, in accordance with the current legislation; and b) with legislation on privileged information and market manipulation.

Information to investors about inside information pertaining to issuers and confirmation or denial of unverified information by the issuers

The Hellenic Capital Market Commission oversees and controls the compliance of companies, the securities of which are admitted for trading in the Athens Exchange, with: a) the provisions of article 17 para. 1 of Regulation (EU) 596/2014 on the obligation of issuers to disclose privileged information, as set out in article 7 of Regulation (EU) 596/2014 and the provisions of article 27, para. 8 of Law 4443/2016 (Government Gazette A 232/9.12.2016), and b) the provisions of article 2 of HCMC Decision 5/204/2000.

Focusing on the orderly operation of the market and the protection of investors, the Hellenic Capital Market Commission monitors news items and announcements concerning the companies with *transferable securities admitted to trading in the Athens Exchange, and in the context of prudential supervision, sends letters to the supervised companies in order for them to:*

- *verify or deny unverified information that could have a material effect on the prices of their transferable securities;*
- *immediately disclose all information deemed as "privileged" and pertaining to the said companies, in order to provide investors with accurate, adequate, and clear information.*

Pursuant to its duties concerning the prudential supervision of company compliance with the aforementioned provisions, in 2023 the HCMC sent 42 letters to companies, and in many cases contacted the companies in order to obtain the relevant information,

In case no timely or reliable information has been provided, the appropriate investigations are carried out, and in case illegal practices are ascertained, the Hellenic Capital Market Commission takes the measures provided for by the law and imposes sanctions.

In 2023, the HCMC proceeded, in the case of two companies, to the suspension of trading on their financial instruments that were admitted for trading on a regulated market, until these companies provided investors with complete and proper information about important events pertaining to them.

Moreover, pursuant to the provisions of article 17 para. 1 of Regulation (EU) 596/2014, in conjunction with the provisions of article 7 of the Regulation and article 27 para. 8 of Law 4443/2016, in 2023 the HCMC levied fines worth a total of 25,000 euros to one (1) company for the non-timely disclosure of privileged information.

Disclosure of major changes in voting rights and provision of the relevant information to investors

In the context of prudential supervision for the proper implementation of Law 3556/2007, the Hellenic Capital Market Commission oversees and controls the transparency obligations in the case of acquisition or sale of major holdings in issuers with transferable securities that have been admitted to trading on a regulated market.

In this context, the Hellenic Capital Market Commission is in communication, both with issuers, and shareholders, in order to clarify issues mostly pertaining to the existence, takeover, or cession of control over legal entities, the chain of companies through which voting rights are possessed, the proper presentation of changes in voting rights, and other ad hoc issues. Furthermore, in the above context, the Hellenic Capital Market Commission sent 2 letters. The above actions are aimed at the provision of investors with proper and complete information.

Pursuant to the provisions of Law 3556/2007 on the obligations concerning the announcement and disclosure of major holdings, shareholders and other responsible persons submitted approximately 259 announcements to the Hellenic Capital Market Commission in 2023. As far as compliance of the *supervised persons with the provisions of the aforementioned law is concerned, in 2023 the Hellenic Capital Market Commission imposed sanctions, which include the levying of total fines of 16,500 on seven (7) individuals or legal entities.*

As regards continuous disclosure issues, the Hellenic Capital Market Commission participated in international work groups and, more specifically, in the Shareholder Transactions Working Group (STWG) of ESMA.

B. Periodic Reporting

Pursuant to articles 4 and 5 of law 3556/2007, the issuers of transferable securities listed in ATHEX are obliged to publish annual and semi-annual financial reports, while, pursuant to article 5b of the same law, banks with transferable securities listed in the ATHEX are also obliged to publish quarterly financial statements (for the 1st and 3rd quarter of each fiscal year) in accordance with the International Financial Reporting Standards (IFRS).

In 2023, as part of the supervision of company compliance with the provisions of Law 3556/2007, and, in particular, compliance with IAS/IFRS, the Hellenic Capital Market Commission performed audits on fifty-three (53) published financial statements of thirty-eight (38) issuers, as compared to thirty-seven (37) published financial statements of thirty (30) issuers in 2022. More specifically, it conducted full audits of:

- *thirty (30) annual and eleven (11) interim financial statements, as compared to twenty-one (21) annual and six (6) interim financial statements in 2021, and*
- *reviewed certain issues concerning eleven (11) issuers related to eleven (11) annual financial statements and one (1) interim financial statement, as compared to reviewing certain issues related to nine (9) annual financial statements in 2021.*

It should be noted that the above figures include the review of a sample of issuers in the context of compliance with the European Common Enforcement Priorities, which are annually published by the European Securities and Markets Authority (hereinafter "ESMA"). As regards the said sample of issuers, the relevant questionnaires were completed and sent to ESMA as per its instructions.

In the context of the above audits, the HCMC called called ten (10) issuers to:

- *publicly disclose corrections (3 issuers); and*
- *make certain corrections, or add notifications to forthcoming financial statements (7 issuers).*

It should be noted that the omissions and deviations ascertained by the aforementioned review mainly concerned the following IAS/IFRS:

IAS 1 – Presentation of Financial Statements

IAS 2 – Inventories

IAS 7 – Statement of Cash Flows

IAS 12 – Income taxes

IAS 24 – Related Party Disclosures

IAS 40 – Investment property

IFRS 2 —Share-based Payment

IFRS 5 — Non-current Assets Held for Sale and Discontinued Operations

IFRS 7 – Financial Instruments: Disclosures

IFRS 8 – Operating Segments

IFRS 9 – Financial Instruments:

IFRS 13 – Fair Value Measurement

In 2023, the HCMC levied total fines of 271,000 euros to nine (9) issuers for the non-compliance of their financial statements with the IFRS or the non-timely disclosure of financial reports.

Furthermore, pursuant to the provisions of Regulation (EU) 596/2014, and L. 4443/2016, in 2023 the Hellenic Capital Market Commission levied total fines of 30,000 euros for market abuse through financial statements to one (1) legal entity.

Moreover, focusing on investor protection and the orderly functioning of the market, the HCMC requested the Athens Exchange to place the shares of four (4) issuerd under suspension for non-timely disclosure of financial statements.

As part of the supervision of issuer compliance with European Single Electronic Format (ESEF) specifications, the Hellenic Capital Market Commission reviewed, on one hand, high-level compliance with the Transparency Directive (2004/109/EC) concerning the annual financial statements of all issuers subject to L. 3556/2007 with transferable securities admitted to trading in an organized market of the Athens Exchange, and, on the other hand, compliance with the accounting requirements of the ESEF Regulatory Technical Standards concerning a sample of thirteen (13) issuers with consolidated financial statements. Both the issuers and ESMA were notified about the findings of this review.

Moreover, the HCMC confirmed that the issuers fulfilling the relevant criteria of articles 151 and 154 of Law 4548/2018 included in the management report of their Board of Directors non-financial information for understanding the development, performance, position, and impact of its activities in regard to, at least, environmental, social, and labour issues, respect to human rights, combating corruption and bribery-related issues.

In the context of compliance with ESMA's European Common Enforcement Priorities, the HCMC performed a sample audit of the non-financial information contents of the statements of three (3) issuers. The relevant questionnaires were completed and sent to ESMA as per its guidelines.

Finally, as regards periodic reporting issues, the Hellenic Capital Market Commission participated in ESMA's international work groups and, more specifically, in the Issuers Standing Committee (ex European Enforcers Coordination Sessions & Corporate Reporting Standing Committee (CRSC)), the Financial Reporting Working Group (ex European Enforcers Coordination Sessions (EECS)) and the Sustainability Reporting Working Group.

C. Supervision of Listed Companies

Corporate Governance

On 17 July 2021, articles 1-24 of the Law on Corporate Governance (L.4706/2020 - Government Gazette A' 136/17-07-2020) came into effect, with the aim of modernising the institutional framework regarding Corporate Governance (L. 3016/2002 and HCMC Decision 5/204/2000) and ensuring the more efficient operation of the market. Pursuant to the delegating provisions of the new law, the Hellenic Capital Market Commission issues guidelines on specific matters provided for by L. 4706/2020, in order to contribute to the timely and appropriate preparation of supervised companies.

In accordance with article 14 para. 3 sec. j of Law 4706/2020, the internal rules of each supervised company shall include, inter alia, the policy and procedure for conducting a periodical evaluation of the company's Internal Audit System (IAS), regarding the implementation of which, HCMC Decision 1/891/30.09.2020, as amended by HCMC Decision 2/917/17.06.2021, specifies the timing, procedure, periodicity and any specific necessary issue, as well as the characteristics of the persons conducting it.

To this end, the Hellenic Capital Market Commission sent to all listed companies, a letter, with protocol number 784/20.03.2023, which contains comments, clarifications, and recommendations concerning the actions of companies in regard to the proper implementation of Law 4706/2020, HCMC Decision 1/891/30.09.2020, and article 44 of Law 4449/2017, as currently in force. Furthermore, by means of the same letter the Hellenic Capital Market Commission issued additional and updated Q&As concerning the provisions of the aforementioned laws with the purpose of informing the market. Moreover, in the context of evaluating the adequacy and effectiveness of Internal Audit Systems the Hellenic Capital Market Commission carried out a series of meetings with stakeholders (listed companies, independent evaluators etc.) in order to make comments and provide clarifications.

In accordance with HCMC Decision 1/891/30.09.2020, as amended by HCMC Decision 2/917/17.06.2021, on the assessment of the adequacy and effectiveness of the Internal Audit System by an independent evaluator, the first IAS assessment was completed by 31.03.2023, with a reference date of 31.03.2022 and a reporting period of 17.07.2021 – 31.12.2022. In addition, by 31.03.2023 the listed companies sent to the Hellenic Capital Market Commission the summary of the Evaluation Report, which includes a summary and an analysis of findings, the time the report was prepared, the reference date of the evaluation and the reporting period. The Hellenic Capital Market Commission reviewed the Evaluation *summaries of all listed companies and is monitoring the progress of dealing with the material findings that resulted from the said evaluation.*

In 2023, the Hellenic Capital Market Commission evaluated issues pertaining to the corporate governance of companies and imposed total sanctions of 93,000 euros on 4 companies as legal entities and 19 individuals-members of the Board of Directors of a company for violating L. 3016/2002, articles 7 and 17 para.1 of Regulation (EU) 596/2014 and article 27 para. 8 of Law 443/2016, article. 44 of Law 4449/2017, and HCMC Decision 5/204/2000.

Furthermore, in the context of the implementation of the provisions of L. 4706/2020 and article 44 of L. 4449/2017, as currently in force, the HCMC supervises and examines company compliance with the provisions of the aforementioned legislative framework. Moreover, pursuant to its duties concerning the prudential supervision of company compliance with the aforementioned provisions, the HCMC monitored company announcements pertaining to the aforementioned framework and communicated with almost all listed companies, providing them with directions and clarifications concerning the above.

In addition, in the context of the approval of 12 prospectuses by the Board of Directors of the HCMC concerning the public offering of transferable securities and their admission to trading in the Athens Exchange, the HCMC reviewed company compliance with the provisions of L. 4706/2020, article 44 of L. 4449/2017 as currently in force, and HCMC Decision 5/204/2000.

Moreover, the Hellenic Capital Market Commission supervises company compliance with the relevant provisions of the existing legislation as regards the use of the funds raised in the capital market by means of share capital increases or corporate bond issuances, in conjunction with the contents of the relevant prospectus, the decisions and the announcements of competent bodies, and performs on-site audits as regards the final uses. One on-site audit of the uses of funds raised was performed in 2023. In addition, in the context of prudential supervision, the HCMC monitors, through the appropriation reports and the announcements published by companies, the development of the use of funds raised by listed companies, as well as the information provided.

The HCMC was actively involved in two international work groups on corporate governance, participating in the relevant meetings and presenting its proposals and positions. More specifically, HCMC executives participate in the following groups:

- Corporate Governance Task Force of ESMA (one meeting in 2023) Corporate Governance Committee of the OECD (two meetings in 2023)

Supervision & Monitoring of Takeover Bids

The Hellenic Capital Market Commission supervises the implementation of takeover bid legislation, i.e. Law 3461/2006 "Transposition of Directive 2004/25/EC on takeover bids into National Legislation".

In 2023, six (6) requests regarding takeover bids for securities traded in the ATHEX were submitted to the Hellenic Capital Market Commission in accordance with Law 3461/2006, and were approved within the year. It should also be noted that during 2023 the HCMC approved one (1) takeover bid for securities traded in the ATHEX, which had been submitted in the previous year 2022. (Table 29).

In addition, the Hellenic Capital Market Commission received two (2) requests for the execution of squeeze-out rights, i.e. the right of the Bidder that, after the end of the bid, possesses transferable securities representing at least ninety percent (90%) of the Target Company's voting rights to demand the transfer of all the remaining transferable securities of the Target Company. More specifically, in 2023 the following requests were submitted to, and approved by, the Board of the Hellenic Capital Market Commission: (i) the request of Mr Georgios Gerardos for the execution of its squeeze-out right on the shares of "PLAISIO COMPUTERS SA" (approved on 30.3.2023); (ii) the request of Mr. Alexandros Katsiotis for the execution of its squeeze-out right on the shares of "ELGEKA SA" (approved on 20.11.2023).

TABLE 29. Take-over bids in the capital market, 2023

No	Date of submission	Type of bid	Bidder	Target company	Date of Approval	Acceptance period	% of shares prior to the bid	% of shares after the bid
1	22/12/2022	OPTIONAL	Mr. George GERARDOS	PLAISIO COMPUTERS SA	8/2/2023	9/2/2023 – 9/3/2023	82.180%	97.980%
2	9/2/2023	COMPULSORY	PIRAEUS BANK	MARFIN INVESTMENT GROUP HOLDING SA	21/2/2023	24/2/2023 – 21/4/2023	41.427%	87.779%
3	22/2/2023	COMPULSORY	PIRAEUS BANK	ATTICA HOLDINGS S.A	16/3/2023	21/3/2023 – 18/4/2023	79.383%	79.394%
4	25/5/2023	COMPULSORY	STRIX HOLDINGS L.P.	ATTICA HOLDINGS S.A	26/7/2023	31/7/2023 – 28/8/2023	91.227%	97.391%
5	9/6/2023	COMPULSORY	INTPAKOM REAL ESTATE	I. KLOUKINAS - I. LAPPAS S.A. CONSTRUCTION AND COMMERCIAL COMPANY	26/7/2023	28/7/2023 – 25/8/2023	74.207%	87.729%
6	19/7/2023	COMPULSORY	Mr. ALEXANDROS KATSIOTIS	ELGEKA SA	20/9/2023	22/9/2023 – 20/10/2023	85.213%	97.015%
7	11/10/2023	COMPULSORY	INVEL REAL ESTATE(NETHERLANDS) II B.V.	PRODEA REIC	20/11/2023	21/11/2023 – 18/12/2023	87.003%	87.010%

Source: HCMC

De-listing of shares from the Athens Exchange

In accordance with the provisions of article 17 para. 5 of Law 3371/2005, as currently in force, and after requests of the companies themselves , the Board of the HCMC decided to de-list the shares of two (2) companies. More specifically: More specifically, (i) "PLAISIO COMPUTERS SA" submitted a request to the HCMC, concerning the de-listing of its shares from the Athens Exchange, which was approved by the Board of the Hellenic Capital Market Commission on 11.5.2023; (ii) "ELGEKA SA" submitted a request to the HCMC, concerning the de-listing of its shares from the Athens Exchange, which was approved by the Board of the Hellenic Capital Market Commission on 21.12.2023.

Monitoring and supervision of public offerings of transferable securities

In 2023, the Hellenic Capital Market Commission approved the contents of eleven (11) prospectuses and one (1) supplementary prospectus, which raised total funds of 2,651,187,203.58 euros.

More specifically:

-Six (6) Prospectuses and one (1) Supplementary Prospectus concerned corporate actions for the public offering of transferable securities of companies listed in the ATHEX. More specifically, three (3) Prospectuses and one (1) Supplementary Prospectus concerned share capital increases with initial public offering, and two (2) Prospectuses corporate bond issues with public offering.

-Three (3) prospectuses concerned share capital increases with initial public offering of shares and the listing of the issuers in the ATHEX.

-One (1) prospectus concerned the initial admission of issuer shares to trading in the ATHEX.

-One (1) prospectus concerned the sale of existing shares by public offering.

- In 2023, and pursuant to Decision 1/892/13.10.2020 of the Hellenic Capital Market Commission "Acceptable Prospectus languages", the Board of the HCMS approved five (5) prospectuses and one (1) Supplementary Prospectus in English at the discretion of their issuer, as well as the short-form prospectus in Greek.

Finally, the HCMC was actively involved in international and European committees and work groups, participating as an expert in the relevant meetings and presenting its proposals and positions in the context of legislation on prospectuses. More specifically, it participated in the following groups:

-EU Green Bond Standard working party of the Council of the European Union.

- Issuers Standing Committee (ISC) of ESMA.

- Prospectus Working Group (PWG) ofSMA.

- Joint Committee Sub Committee on Consumer Protection and Financial Innovation

- Special Purpose Acquisition Company (SPAC) Network of the International Organization of Securities Commissions (IOSCO)

Fines

Investment Firms, Financial Intermediation Firms, Mutual Fund Management Companies, and Banks

- *A fine was levied on one (1) firm for violating article 16 of Law 4514/2018 concerning the organisational requirements of investment firms (Article 16 of Directive 2014/65/EU).*
- *Fines were levied on five (5) firms for violating article 24 of Law 4514/2018 concerning the provision of information to clients (Article 24 of Directive 2014/65/EU).*
- *A fine was levied on one (1) firm for violating article 13 of Law 4557/2018 concerning the standard due diligence measures implemented by supervised persons in regard to clients.*
- *A fine was levied on one (1) firm for violating article 13 of Law 4557/2018 concerning the obligation of supervised persons to implements internal policies, controls and procedures in proportion to the nature and size of the supervised persons, in order to effectively deal with money laundering and terrorist financing risks at the national, European and international levels.*
- *A fine was levied on one (1) firm for violating HCMC Decision 1/506/2009 on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing.*
- *Fines were levied on two (2) firms for violating Regulation 565/2017/EU on the organizational requirements and terms of operation of investment firms.*
- *A fine was levied on one (1) firm for violating Regulation 575/2013/EU on the prudential supervision requirements for credit institutions and investment firms.*

Listed Companies

- *Fines were levied on six (6) listed companies for violating article 4 of Law 3556/2007 on the issuers' obligation to publish annual financial reports.*
- *Fines were levied on five (5) listed companies for violating article 5 of Law 3556/2007 on the issuers' obligation to publish semi-annual financial reports.*
- *Fines were levied on three (3) listed companies for violating article 19 of Law 3556/2007 regarding the submission to the HCMC of regulated information about the admission of transferable securities to trading in a regulated market.*

- *Fines were levied on three (3) listed companies for violating article 21 of Law 3556/2007 regarding the obligation of issuers to post on an obvious place of their website regulated information at the same time such information is disclosed.*
- *A fine was levied on one (1) listed company for violating article 26 of Law 3556/2007 concerning the issuer's obligation to provide the HCMC with the information or documents set out in paragraph 2 of article 23.*
- *Fines were levied on two (2) listed companies for violating article 27 of Law 596/2014 in conjunction with Regulation 596/2014 EU concerning the non-disclosure of privileged information.*
- *A fine was levied on one (1) listed company for violating article 45 of L. 4443/2016 on the non-submission of the updated list provided for by article 19, para. 5 of Regulation (EU) 596/2014.*
- *A fine was levied on one (1) listed company for violating HCMC Decision 5/204/14.11.2000 on the Code of Conduct for ATHEX-Listed Companies and persons connected to them.*
- *A fine was levied on one (1) listed company for violating HCMC Decision 8/754/2016 concerning Special Periodic Reporting Matters pursuant to Law 3556/2007.*
- *A fine was levied on one (1) listed company for violating article 15 of Law 596/2014 that prohibits market manipulation.*

Legal Entities

- *Fines were levied on two (2) legal entities for violating articles 14 & 19 of law 3556/2007 on the information they are obliged to disclose to the issuer in the case of acquisition or sale of major holdings or the exercise of major voting right percentages, the content of this information, as well as their simultaneous submission to the Hellenic Capital Market Commission.*
- *A fine was levied on one (1) legal entity for violating article 8, of L. 3606/2007 which prohibits the provision of investment services and the conduct of investment activities in Greece by persons lacking the requisite authorisation by the Hellenic Capital Market Commission.*
- *A fine was levied on one (1) legal entity domiciled in another member state that is not subject to Directive 2009/65/EC, or domiciled in a third country, for violating article 92 of Law 4099/2012 concerning the obligation to receive authorisation from the Hellenic Capital Market Commission for the sale of shares of undertakings for collective investments in Greece.*
- *A fine was levied on one (1) legal entity for violating article 41 of Law 4209/2013 concerning the marketing of units or shares in AIFs in Greece (article 43 of Directive 2011/61/EU) only by AIFMs operating in Greece on the basis of the Passport set out in Part A (articles 1-53).*

Individuals

- *Fines were levied on six (6) individuals for violating article 3 of Law 3016/2002 concerning the members of the Board of Directors of a societe anonyme that has shares or other transferable securities admitted to trading in a regulated market operating in Greece.*

- *Fines were levied on five (5) individuals for violating articles 14 & 19 of law 3556/2007 on the information they are obliged to disclose to the issuer in the case of acquisition or sale of major holdings or the exercise of major voting right percentages, the content of this information, as well as their simultaneous submission to the Hellenic Capital Market Commission.*

- *A fine was levied on one (1) individual for violating article 26 of Law 3556/2007 concerning the issuer's obligation to provide the HCMC with the information or documents set out in paragraph 2 of article 23.*

- *Fines were levied on seven (7) individuals for violating article 44 of Law 4449/2017 on the obligation of all public-interest entities to have an Audit Committee that consists of at least three (3) members.*

- *Fines were levied on three (3) individuals for violating Regulation (EU) 596/2014 that prohibits market manipulation or attempts thereof through the use of financial statements.*

It should be made clear that all the fines imposed by the Hellenic Capital Market Commission are not collected by the HCMC itself. The collection of fines (including those levied on foreign natural or legal persons) is carried out by the competent Tax Offices, given that fines are public revenues. The HCMC is only obliged to sent the relevant lists to the Tax Offices, verifying the said fines. The total fines levied by the Hellenic Capital Market Commission in 2023 stood at €785.500,00 ευρώ. The allocation of fines among supervised entities is presented in Table 30.

TABLE 30. Number and value of fines, 2023.

Number of cases	Entity	Fines (€)
12	Investment Firms, FIFs, MFMCs, and Banks	72,000
24	Listed Companies	358,000
5	Other legal entities	50,000
22	Individuals	305,500
Total: 63		785,500

Source: HCMC

OTHER ACTIVITIES

Tackling Money Laundering and Terrorist Financing

The Special Anti-Money Laundering and Terrorist Financing Unit, which operates pursuant to art. 6, paragraph 6 of Law 4557/2018, aims at monitoring the compliance of supervised entities with their obligations regarding the prevention and suppression of money laundering and terrorist financing. In this context, the Special Unit performs audits on the supervised entities and, at the same time, submits reports to the Anti-Money Laundering Independent Authority in regard to any suspicious transactions possibly detected.

In 2023, the Special Anti-Money Laundering and Terrorist Financing Unit performed, in the context of prudential supervision, twenty-five (25) on-site audits, as compared to eight (8) in 2022, in supervised firms, and more specifically in:

- *two (2) Investment Firms;*
- *four (4) Mutual Fund Management Companies (MFMCs);*
- *two (2) Venture Capital Management Firms;*
- *two (2) Alternative Investment Fund Managers (AIFMs);*
- *one (1) branch of an AIFM;*
- *eleven (11) Financial Intermediation Firms (FIFs); and*
- *three (3) providers of exchange services between virtual currencies and fiat currencies.*

The audits performed on the aforementioned companies during the year, for which the administrative procedure had been completed, led to: a) the detection of a breach of the law and the levying of a € 10,000 fine on one (1) Investment Firm and b) the detection of shortcomings, mainly in regard to the ML/TF procedures implemented, in two (2) FIFs, to which written recommendations were made.

As part of supervision, the supervised firms submitted electronically to the HCMC the Compliance Officers' Annual Report on the prevention of money laundering and terrorist financing for the year 2022, in accordance with paragraph 2 of article 10 of Decision 1/506/8.4.2009, through the specialized IT application that was relatively recently purchased by the Hellenic Capital Market Commission and is continuously upgraded with the help of the Unit's executives.

The Annual Reports for the year 2023 shall be submitted by the firms through the above IT application by 31 March 2023.

The information from the Annual Reports will be used for the ML/TF Risk Assessment for each supervised firm, and the preparation of an Audit Schedule, on which the selection of the firms to be audited in the next period will be based.

In addition, the Unit's executives perform auxiliary reviews of the ML/TF procedures of the firms that are to be authorised by the Directorate of Capital Market Intermediaries, submitting their comments, and handle any submitted complaints.

In 2023, and in order to provide supervised firms with information, posted on its website (http://www.hcmc.gr/el_GR/web/portal/mlaundering1) among others:

- *Three (3) announcements regarding FATF press releases on high-risk countries and regions as regards money laundering and terrorist financing.*
- *Three (3) FATF announcements concerning the countries and regions showing strategic weaknesses in the field of money laundering and terrorist financing.*

In 2023, four (4) firms were registered with the Crypto-currency Service Provider Registers electronically maintained by the HCMC as providers of exchange services between virtual currencies and fiat currencies and as custodian wallet providers, and one (1) firm was registered solely as a custodian wallet provider. Moreover, in the same year one (1) Provider was stricken off the said registers.

Within the same year, an executive of the Special Unit participated in the mutual evaluation of Qatar by FATF.

Finally, during 2023 the executives of the Special Unit participated, among others, in the following seminars, conferences, plenaries and working groups:

- *in the teleconferences of four (4) colleges of supervisors for supervised firms that belong to banking groups and a foreign AIFM with a branch in Greece;*
- *in the teleconferences of the AML Standing Committee of EBA;*
- *in the teleconferences with the EBA work group on EuReCa ('European Reporting system for material CFT/AML weaknesses')*
- *in the work groups and the steering groups for updating the National ML/TF Risk Assessment report;*
- *in the work group for the preparation of the political debates on the AMLR Regulation and the AMLD Directive;*
- *in the FATF-INTERPOL conference Roundtable Engagement (FIRE) II "IGNITING GLOBAL ASSET RECOVERY",*
- *in the IOSCO webinar, World Investor Week 2023.*

Professional certification of capital market agents

The current regime for the professional certification of persons providing services in accordance with article 93 of L. 4514/2018 is regulated by means of HCMC Decision 18/809/21.2.2018 (Gov. Gaz. B 859/12.3.2018), in implementation of article 93 of Law 4514/2018 (Gov. Gaz. A 14). This article *establishes the obligation of Investment Firms, Financial Intermediation Firms, Mutual Fund Management Companies, Portfolio Investment Companies and Alternative Investment Fund Managers, to employ holders of Certificates of Suitability for the provision of investment and other services.*

The Certificate of Suitability refers to eight specific types of services: (α1): Receipt, transmission and execution, on behalf of third parties, of orders on transferable securities, shares/units in collective investment undertakings, and money market instruments; (α2): Receipt, transmission and execution, on behalf of clients, of orders on derivative products; (β): Provision of investment advice concerning transferable securities, shares in collective investment undertakings, and money market instruments, derivative products, and structured financial products; (b1): Provision of investment advice concerning transferable securities, shares in collective investment undertakings, and money market instruments; (c): Client asset management; (d): Preparation of analyses on financial instruments or issuers; (ε) Sale of shares/units in UCITS or other undertakings for collective investment; (στ1): Clearing of transactions on transferable securities; and (στ2): Clearing of transactions on derivatives.

The Certificate is issued by the HCMC if the applicant has successfully participated in certification exams (both on special subjects and on the legislative framework) or, having worked as a trainee, has successfully attended certification seminars and sat in the relevant exams for certificates (α1), (ε), (στ1) and (στ2), or is the holder of equivalent certificates issued or recognised by the competent capital market regulators of IOSCO members and has passed the exam on the "Capital Market Regulatory Framework" module.

Moreover, certification is also conditional to the fulfillment of additional suitability criteria, such as the fulfillment of minimum personal reliability requirements and, depending on the certificate, of specific minimum qualifications.

The certificate bestowed by the Hellenic Capital Market Commission is valid for five years, renewable either via attendance to a training seminar on developments in the regulatory framework of the capital market, or via successful participation in the examination on the regulatory framework module, or without attendance to the training seminar or successful participation in the exam on the regulatory framework, provided that the certified individual has specific previous experience.

In implementation of the above, 482 applications for participation in the exams or the seminars that were organised during the year (March, May, and November) were submitted in 2023, and 190 certificates were granted, as compared to 360 applications submitted and 175 certificates granted in 2022. More specifically, 65 certificates were granted in specialty (α1), 51 certificates in specialty (α2), 26 certificates in specialty (β1), 28 certificates in specialty (β), 6 certificates in specialty (γ), 1 certificates in specialty (δ), 8 certificates in specialty (στ1), and 5 certificates in specialty (στ2). Moreover, 11 certificates were granted in 2023 without participation in the exams, following the submission of requests for exception due to equivalence and participation in the exams on the "Capital Market Regulatory Framework" module. In 2023, finally, 106 certificates were renewed, which expired on

31.12.2023, while 98 persons were deleted from the certified persons' list, since their certificates expired on 31.12.2022 and were not renewed. The total number of persons certified by the Hellenic Capital Market Commission as per the end of 2023 stood at 2999.

Investigation of complaints/reports

As part of the active supervision of the capital market, the Hellenic Capital Market Commission receives and investigates complaints and reports by investors or other persons (legal and natural) concerning possible violations of capital market legislation by supervised entities, in collaboration, wherever required, with the Hellenic Ombudsman for Banking-Investment Services.

The Hellenic Capital Market Commission investigates the complaints against the entities it supervises exclusively as regards compliance with capital market law, and wherever violations are detected it imposes the appropriate sanctions, which are made public.

The Hellenic Capital Market Commission is not an intermediation agency responsible for the resolution of disputes and does not deal with cases of private disputes.

The complaints are mostly investigated on the basis of their number of record, based on the protocol number of incoming documents. The time it takes for a complaint to be processed depends on its content, as well as the violations that may occur.

The procedure for processing these reports is the following:

- *Letters of inquiry are sent to the supervised entities concerned.*
- *The submitted information is evaluated.*
- *If no violation of capital market legislation is ascertained, the case is closed, and the person submitting the complaint or the report is duly notified.*
- *If a violation of capital market legislation is ascertained, the applicable procedure for the imposition of administrative sanctions is triggered. The person submitting the complaint is informed in writing after the complaint has been processed.*

In 2023, 152 complaints/reports were submitted to the Hellenic Capital Market Commission as compared to 146 complaints/reports in 2022, 194 complaints/reports in 2021, 147 complaints/reports in 2020, 85 in 2019 and 116 in 2018, while 204 complaints were processed as compared to 178 complaints in 2022. Furthermore, the Communication Department issued, after investigating relevant complaints and in the context of investor protection, 69 announcements-warnings to investors concerning fraudulent online platforms and illegal activities of individuals seeking to defraud investors. Finally, the Communication Department informed investors about online investment fraud and how can investors be protected from them, as well as about the persons that can produce investment recommendations and their obligations *as regards the objective presentation of the recommendations and the disclosure of interests or conflicts of interest.*

ACTIVITIES OF THE DIRECTORATE OF LEGAL SERVICES

*In **2023**, the Directorate of Legal Services (DLS) of the Hellenic Capital Market Commission (HCMC) handled a large number of legal cases, offered in many instances legal advice and opinions to the competent departments of the HCMC, and was actively involved in the legislative and regulatory work of the HCMC, both on the national and EU levels. More specifically, the Directorate was active in the following areas:*

1. Litigation

*In **2023**, the DLS had to deal with the following court cases:*

a. DLS attorneys were present at the administrative courts (Council of State, Administrative Appellate Court of Athens, and Administrative Courts of First Instance) during the hearings of 68 cases.

*They also include **2** cases that were heard in administrative courts in the presence of external attorneys.*

*The attorneys of the DLS prepared and filed written arguments or memoranda with the administrative courts in another **22** cases, not adjudicated nevertheless during 2023, as a result of adjournment due to the abstention or because of other reasons.*

*b. Fifty-one cases were heard in criminal courts with the participation of the HCMC, either following a lawsuit or ex officio. A further **9** criminal cases were prepared by the DLS and are pending in front of the investigating authorities.*

*c. DLS attorneys were present at civil courts during the hearings of **4** cases.*

*d. Finally, in the case of **9** questions entered to European Courts, the respective memoranda have been prepared.*

*2. Proposal for, and application of, remedies in **21** cases.*

3. Provision of legal support

*The DLS provided legal aid to the competent departments of the HCMC in **299** cases. More specifically, DLS attorneys:*

- *Drafted 50 legal opinions on various serious legal issues.*
- *Prepared **61** notes answering various legal questions.*

- *They also offered legal advice in **178** cases in the form of comments or corrections (without drafting a note or an opinion), during the preparation of correspondence concerning the execution of the right to be heard, during the drafting of proposals to the Board and the Executive Committee, during the preparation of individual decisions of the Board and the EC, during the drafting of announcements and contracts, and so forth.*

4. Involvement in the legislative and regulatory work

*Attorneys of the DLS participated in the Commission's legislative and regulatory work, and more specifically in the preparation of draft laws and amendments to laws (**26** cases) and the preparation of regulations (**25** cases). They also participated in European Union work groups for the amendment of existing regulations and directives or the preparation of proposals for implementing measures in **2** cases.*

5. Court rulings delivered to the HCMC during 2022

*In **2023**, **60** court rulings were delivered to the Hellenic Capital Market Commission. Of these:*

- ***33** rulings were **in favour** of the Hellenic Capital Market Commission, rejecting appeals, caveats or actions against it or approving requests for rescission and appeal submitted by the HCMC.*
- ***4** rulings were **partly in favour** of the HCMC, partly approving appeals and caveats against it, mainly by reducing the fines imposed.*
- ***3** rulings were **against** the HCMC, approving appeals, caveats or actions against it or rejecting requests for rescission, appeal or motions submitted by the HCMC.*
- ***2** rulings led to the **postponement or the recommittal or the annulment** of the trial.*

6. Out-of-court settlement

7. Major court rulings

The major court rulings delivered to the HCMC during 2023 were the following:

Council of the State 1672/2022 (in favour of the HCMC)

Dismissal of a request for the reversal of an ACA ruling, rejecting an appeal against the decision to levy a fine for violation of article 7 para. 1, 2 (a) of Law 3340/2005 (stock manipulation).

According to this ruling, inter alia, as inferred by the formulation of the above provisions, the concept of manipulation by means of transactions is given in an objective manner, i.e. without any subjective elements entering the definition, such as the intent or the goal of the manipulator, which are therefore do not constitute an object of proof in order to establish the violation, albeit the occurrence of the result suffices, i.e. that misleading indications are given, or may possibly be given, concerning the price of the financial instrument or this price is set at an irregular or artificial level. After all, the definition of the *prohibited manipulation is not given in reference to the perpetrators, albeit by the description of the actions that may, because of their consequences, establish an attempt to manipulation. Also, in accordance with article 23 para. 1 of the law the administrative sanction is imposed on every person that violates the prohibition, a provision equivalent to the requirement of article 5 of Directive 2003/6 (Member States shall prohibit any person from engaging in market manipulation), as well as article 14 (appropriate measures can be taken against the persons responsible for non-compliance with the provisions adopted).* ***Hence, when the attempt to manipulate is carried out by many persons acting in unison, the violation is not perpetrated only by the persons who apparently have performed the transactions or given the relevant orders, but also by the persons that are actively aiding market manipulation through transactions or orders. Finally, it is deemed that the legitimacy of the sanction does not require the determination of the mount to which the share price would stand if there had been no such transactions.***

Council of the State 1150/2022 (in favour of the HCMC)

Approval of a request for rescission submitted by the Hellenic Capital Market Commission, rescinding and referring back to the ACA, an ACA ruling rescinding an HCMC Decision levying a fine for violation article 7 par. 1 and 2c, 3d of Law 3340/2005 (dissemination of inaccurate and misleading information through financial statements).

The CoS ruling states, inter alia, that, contrary to the violations subject to cases a and b of para. 2, article 7 of Law 3340/2005, which explicitly stipulate that the execution of transactions or orders is necessary for ascertaining the said violations, in order to ascertain the violation of the discrete category set out in case c of para. 2 of article 7, the execution of transactions or relevant orders is not necessary, albeit market manipulation may be committed simply through the dissemination of false, inaccurate or misleading information in any way, and in particular –in this case, through the financial statements, implying in any case the risk of misleading investors. ***According to the CoS ruling, the above interpretation is consistent with the purposes of Directive 2003/6/EC, which would be at stake if the scope of the relevant provisions was limited to attempts of market manipulation through the dissemination of or misleading false information exclusively in the case where the relevant transferable securities have been the object of transaction in a regulated market.***

Council of the State 1223/2023 (in favour of the HCMC)

Dismissal of a request for the reversal of an ACA ruling, rejecting an appeal against the decision to levy a fine for violation of article 7 para. 1, 2 (a) of Law 3340/2005 (stock manipulation).

The CoS ruling deems, inter alia, that in order for unfair market manipulation to exist, it suffices to ascertain the existence of an intervention that affect in any way the closing price, notwithstanding the numerical result per se (price increase or decrease or stabilization) nor the spread between the artificial and the normal price, which results from comparing prices with and without the intervention. Therefore, the relevant provisions neither specify, nor their interpretation implies, any specific criterion or *calculation method for setting the price at an irregular or artificial level, and this conclusion, as an objective judgment,* ***rests on the evaluation of the substance of the case by the Administration and the courts on the basis of the evidence and facts of the case, as well as on the free evaluation of the proof presented to them.***

STUDIES BY THE HELLENIC CAPITAL MARKET COMMISSION

HCMC Survey on Mutual Fund Charges in Greece

As part of monitoring and supervising the Greek capital market, the HCMC has undertaken a research project collecting and analysing data submitted by supervised Mutual Fund Management Companies (MFMCs) related to the fees and charges applied by MFMCs on the UCITS they manage (funds that have been authorised by the HCMC) for the years 2016-2022. The analysis of these data by the Directorate of Research was performed at both the aggregate level, and per M/F category (equity, bond, money market, funds of funds, specialist), as well as per type of charge (subscription fees, redemption fees, ongoing charges, and performance fees).

The analysis of the data submitted by MFMFs shows that:

In 2022, 14 MFMCs were operating in Greece, as in 2021, 2020 and in 2019, compared to 15 MFMCs in 2018 and 2017, and 14 in 2016. The total number of mutual funds on sale, taking into account different classes of units, at the end of 2022 stood at 236 (157 M/Fs if different classes of units are not taken into account). More specifically, per M/F category, the number of M/Fs was the following, taking into account different classes of units: 69 equity M/Fs, 79 bond M/Fs, 43 balanced M/Fs, 9 money market M/Fs, 16 equity FoFs, 11 balanced FoFs, 3 bond FoFs, and, finally, 6 specialist M/Fs.

The following table presents the total number of mutual funds in 2016-2022, both taking and not taking into account different classes of units as different M/Fs. The same table also presents the averages of the aforementioned charges for the same years (2016-2022, both for M/Fs of all categories (Total M/Fs), and for individual M/F categories (i.e. Balanced, Bond, Equity, Balanced FoFs, Bond FoFs, Equity FoFs, Money Market, and Specialist).

Based on the above data, in 2022 and ***for all M/Fs subscription fees decreased*** *and stood at 0.31% as compared to 0.33% in 2021, 0.30% in 2020 and 2019, 0.31% in 2018, 0.40% in 2017 and 0.47% in 2016.*

Ongoing charges *for* ***all M/Fs increased*** *in 2021 and stood at 1.66%, as compared to 1.63% in 2021 and in 2020, 1.91% in 2019, 2.08% in 2018, 2.36% in 2017 and 2,28% in 2016.*

Redemption fees *for* ***all M/Fs increased*** *in 2022 and stood at 0.28%, as compared to 0.23% in 2021, 0.24% in 2020, 0.25% in 2019, 0.24% in 2018, 0.31% in 2017 and 0,36% in 2016.*

Performance fees for all M/F categories decreased *to 0.28% in 2022, as compared to 0.43% in 2021, 0.25% in 2020, 0.29% in 2019, 0.15% in 2018, 0.10% in 2017 and 0,03% in 2016.*

TABLE 31. Average Charges per M/F Category & Number of M/Fs (2016-2022)

Category	Period	Subscription fee (%) per unit class	Redemption fee (%) per unit class	Ongoing Charges (%) [2]	Performance fee (%) per unit class	Number of M/Fs (with unit classes)	Number of M/Fs (without different unit classes)
TOTAL M/Fs	2022Y	0.31%	0.28%	1.66%	0.28%	236	157
	2021Y	0.33%	0.23%	1.63%	0.43%	218	148
	2020Y	0.30%	0.24%	1.63%	0.25%	217	152
	2019Y	0.30%	0.25%	1.91%	0.29%	207	146
	2018Y	0.31%	0.24%	2.08%	0.15%	203	145
	2017Y	0.40%	0.31%	2.36%	0.10%	172	150
	2016Y	0.47%	0.36%	2.28%	0.03%	161	160

[2] Ongoing Charges include tax charges, as specified by the provisions of article 103 of Law 4099/2012. More specifically, paragraph 3 of this article stipulates that:
3. The management company, in the name and on behalf of the mutual fund or the SICAV, or on an ad hoc basis, the SICAV provided for by article 40, is obliged to pay a tax, which is calculated on a daily basis on the six-month average of the net assets of the UCITS or any individual investment department thereof.With the payment of the tax the tax obligation of the UCITS and its unitholders or shareholders is exhausted.

The tax rate is set at ten percent (10%) of the interest rate on the main refinancing operations of the Eurosystem of the European Central Bank (hereinafter the Reference Rate), with the following surcharges, depending on the category of each UCITS or any investment department thereof, based on a relevant Decision by the Board of the Hellenic Capital Market Commission:

a) money market UCITS, no surcharge;

b) bond UCITS, twenty five basis points (0.25);

c) balanced UCITS, five basis points (0.5);

d) equity UCITS, and all other UCITS categories, excluding the ones mentioned above, one percentage point (1).

"The tax due for each semester can not be less than:

a) 0.025% of the six-month average net assets in the case of money market UCITS;
b) 0.175% of the six-month average net assets in the case of bond UCITS;
c) 0.25% of the six-month average net assets in the case of balanced UCITS;
d) 0.375% of the six-month average net assets in the case of equity and other UCITS;''

BALANCED	**2022Y**	0.49%	0.36%	1.83%	0.48%	43	34
	2021Y	0.59%	0.29%	1.69%	0.47%	43	35
	2020Y	0.59%	0.31%	1.69%	0.09%	41	35
	2019Y	0.54%	0.36%	1.97%	0.56%	38	31
	2018Y	0.54%	0.34%	2.15%	0.03%	39	31
	2017Y	0.74%	0.45%	2.33%	0.22%	31	29
	2016Y	0.61%	0.47%	2.28%	0.04%	31	30
BOND	**2022Y**	0.22%	0.26%	1.09%	0.33%	79	46
	2021Y	0.20%	0.18%	1.07%	0.10%	66	41
	2020Y	0.19%	0.20%	1.04%	0.02%	70	45
	2019Y	0.20%	0.20%	1.21%	0.29%	69	45
	2018Y	0.21%	0.21%	1.44%	0.00%	54	36
	2017Y	0.24%	0.23%	1.53%	0.05%	41	36
	2016Y	0.33%	0.26%	1.56%	0.03%	33	33
EQUITY	**2022Y**	0.28%	0.19%	2.24%	0.22%	69	42
	2021Y	0.29%	0.20%	2.14%	0.70%	68	40
	2020Y	0.29%	0.24%	2.14%	0.58%	67	43
	2019Y	0.31%	0.27%	2.56%	0.25%	59	40
	2018Y	0.34%	0.28%	2.83%	0.51%	56	39
	2017Y	0.41%	0.36%	3.13%	0.12%	53	45
	2016Y	0.45%	0.38%	3.10%	0.05%	50	50
BALANCED FoFs	**2022Y**	0.05%	0.12%	1.63%	0.11%	11	9
	2021Y	0.08%	0.13%	1.51%	0.08%	9	8
	2020Y	0.07%	0.17%	1.62%	0.00%	8	6
	2019Y	0.11%	0.20%	1.88%	0.30%	8	6
	2018Y	0.11%	0.17%	2.19%	0.00%	9	7
	2017Y	0.26%	0.19%	2.39%	0.15%	7	7

	2016Y	0.04%	0.33%	2.04%	0.00%	8	8
BOND FoFs	**2022Y**	0.04%	0.33%	0.87%	0.00%	3	2
	2021Y	0.07%	0.25%	0.85%	0.00%	4	3
	2020Y	0.06%	0.25%	1.16%	0.00%	4	3
	2019Y	0.04%	0.25%	1.38%	0.02%	4	3
	2018Y	0.04%	0.25%	1.45%	0.00%	4	3
	2017Y	0.10%	0.34%	1.71%	0.00%	3	3
	2016Y	0.00%	0.36%	1.56%	0.00%	3	3
EQUITY FoFs	**2022Y**	0.28%	0.28%	2.62%	0.00%	16	11
	2021Y	0.29%	0.28%	2.65%	0.00%	16	11
	2020Y	0.29%	0.27%	2.80%	0.15%	16	11
	2019Y	0.29%	0.29%	3.22%	0.00%	18	12
	2018Y	0.40%	0.29%	3.41%	0.00%	18	12
	2017Y	0.36%	0.37%	3.97%	0.01%	17	12
	2016Y	0.58%	0.51%	3.89%	0.00%	12	12
MONEY MARKET	**2022Y**	0.01%	0.00%	0.46%	-	9	7
	2021Y	0.08%	0.07%	0.50%	-	10	8
	2020Y	0.10%	0.02%	0.50%	-	10	8
	2019Y	0.06%	0.00%	0.52%	-	10	8
	2018Y	0.01%	0.02%	0.57%	0.00%	22	16
	2017Y	0.00%	0.03%	0.65%	0.00%	18	16
	2016Y	0.00%	0.03%	0.65%	0.00%	16	16
SPECIALIST FUNDS	**2022Y**	1.92%	1.67%	1.03%	-	6	6
	2021Y	3.00%	2.00%	0.95%	-	2	2
	2020Y	3.00%	2.00%	0.74%	-	1	1
	2019Y	3.00%	0.50%	1.87%	-	1	1
	2018Y	3.00%	0.50%	1.87%	0.00%	1	1

2017Y	3.00%	0.50%	1.87%	0.00%	2	2
2016Y	2.00%	0.62%	1.43%	0.00%	8	8

Source: HCMC

It should be noted that charges fall under the following categories, as follows:

A. Front-end and back-end charges

1. ***Subscription fee** = the cost of participation in the mutual fund*
2. ***Redemption fee** = the cost of withdrawal from the mutual fund*

B. Charges paid from a mutual fund's assets during the year:

1. ***Ongoing Charges:** calculated on the basis of the results for the financial year and may vary from year to year. They include, among other things, management and custodian fees, as well as the fees of legal and other advisors, tax charges and other expenses incurred on behalf of the mutual fund. They do not include the performance fee and the cost of transactions on the assets of the mutual fund's portfolio, apart from the subscription or redemption fees paid by the mutual fund upon acquiring or redeeming units in another undertaking for collective investments.*
2. ***Performance fee:** is calculated on the spread between the performance of the mutual fund and the performance of the benchmark index used by the company, which is selected on the basis of the investment policy and strategy of the mutual fund and reflects the risk-return profile of the mutual fund.*

HCMC Survey on the Provision of Investment Services to Retail Investors in Greece

The Hellenic Capital Market Commission collects and processes semi-annual data on the demand for financial instruments and investment services by retail investors, the way these instruments are advertised by the supervised companies, and the methods selected by retail customers and/or unit holders to communicate with supervised companies. Moreover, it records investor interest and the provision of innovative investment products by the supervised companies. The results from the processing of the statistical data are used in order to form an opinion on the trends regarding the provision of investment services in the Greek market. Moreover, these findings are submitted to the European Securities and Markets Authority (ESMA) in the form of answers to relevant questionnaires, in the same manner that relevant information is submitted by the other national competent authorities of the EU to ESMA, with the purpose of forming an opinion on the trends prevailing in EU member-state markets.

More specifically, the companies that are supervised by the HCMC (investment firms, collective investment management firms, banks that have been authorised and provide investment services) are asked to submit semi-annual data on their turnover from the provision of specific investment services (execution of orders on behalf of clients, provision of investment advice, and portfolio management), the value of investment product transactions by their clients, the number of retail customers and/or shareholders, on an ad hoc basis, the method selected by these customers/shareholders for *communicating with the companies, and, finally, the means used for the promotion/advertisement of investment products. Moreover, the supervised companies are asked to report the number of their retail customers who demanded, or expressed interest for, specific innovative products, or to whom they offered or intend to offer the said innovative products.*

INNOVATION HUB

The European-wide, as well as international, growth of companies that employ innovate information technologies in the field of financial services (namely Fintech) has also affected Greek reality, leading to the establishment of a domestic Fintech ecosystem. More specifically, many financial service providers and, in general, financial institutions, have started considering the use of technologically innovative products and services, or are already providing such products and services, with the aim of gaining a competitive advantage, while an increasing number of investors is interested in, or is already using, digital innovative products and financial services through digital communication channels, mainly via the Internet and mobile phones.

In this context, and focusing on investor protection, and ensuring the orderly operation and integrity of the market, in July 2019, the HCMC established an Innovation Hub, with the following objectives:

(a) provision of support to firms offering financial technology products and services, in their effort to understand the implementation of the existing regulatory framework and any compliance obligations;

(b) interaction with the said firms, in order to detect, and deal with, the risks as well as highlight the potential benefits, which accompany new products and services, and promote the sound growth of the financial innovation sector; and

(c) determination of the need to submit legislative proposals for the establishment of a beneficial, appropriate, and proportionate national legislative framework.

Therefore, through the operation of the Innovation Hub, the HCMC looks forward to the development of an innovative technology environment within the financial services sector, which will be based on secure solutions so that, on one hand, investor confidence in the financial market is not undermined and, on the other hand, Fintech firms are allowed to grow in a sustainable manner.

The Innovation Hub is addressed to:

- *Startup entities, which are planning to operate in the financial sector, in areas of competence of the HCMC, and have created an innovative product or service through the use of modern information technology; or*
- *Companies that are already supervised by the HCMC, and plan to introduce an innovative Fintech product or service, through the use of modern information technology.*

For example, the aforementioned entities or companies may be operating in Fintech fields related to artificial intelligence applications, Distributed Ledger Technologies, and activities such as Equity-based Crowdfunding, and Crypto-currencies/ crypto-assets.

In 2023, three requests for assistance were received, as compared to four in 2022 and ten in 2021. The requests were submitted by foreign entities and by a joint venture of domestic entities. The former were interested in establishing operations in Greece or in the presentation of a product/application that facilitates company compliance with the legislative framework (RegTech). The latter was interested in cooperating with the Hellenic Capital Market Commission on training issues. The requests pertain to: the use of artificial intelligence to support the provision of investment services, in particular the assessment of suitability (1 request); the use of DLT applications for facilitating payments (1 request); and, finally, the provision of a training programme on crypto-asset and blockchain-related issues (1 request).

A representative of the Innovation Hub Team participates in the meetings of the European Forum for Innovation Facilitators of the European Supervisory Authorities (ESAs). This forum was created (2019) with the purpose of providing a platform of communication among innovation facilitators for sharing technological knowledge and experience from their engagement with innovative entities, the presentation of legislative initiatives of the member states, and the promotion of a common approach on the regulatory treatment of innovative products, services and business models, overall boosting bilateral and multilateral coordination and cooperation.

Finally, the executives of the Innovation Hub Team, as well as executives of the supervisory Directorates of the Hellenic Capital Market Commission, participated, together with representatives of other national regulators, in regulatory dialogues as part of the 1st cohort of the European Blockchain Regulatory Sandbox. This is an initiative of the European Commission aimed at promoting innovation at the European level through dialogue and cooperation between supervisory/regulatory authorities and entities that have created an innovative product or service or business model based on the use of blockchain technology. The purpose of these dialogues is to investigate how the existing European legislative framework can be implemented on the proposed innovations, with the aim of eliminating any regulatory and legal uncertainty. In particular, the Hellenic Capital Market Commission participated in discussions concerning the financial sector. Two more of dialogues will follow, in the two years the European Blockchain Regulatory Sandbox is bound to operate.

FINANCIAL POSITION

According to the published data concerning the execution of the Budget for the fiscal year 2023, which are prepared on the basis of the Public Accounting System, total revenues rose to 10,870 thousand euros from 8,586 thousand euros in 2022. These revenues include an amount of 1,058.96 thousand euros, which concerns the execution of the project: "Development and Implementation of a Plan for the Improvement of the Internal Organisation of the Hellenic Capital Market Commission" through credits *from the Public Investments Budget, and which is financed by the European Union (European Social Fund –ESF) and by national resources through the PIB, and at the same time also appears as an expense for the repayment of the aforementioned project within 2023. Thus it is clarified that the project "Development and Implementation of a Plan for the Improvement of the Internal Organisation of the Hellenic Capital Market Commission" was 100% financed by the PIB and for this reason the amount of 1,058.96 thousand euros appears first as revenue and then expenditure. Therefore, the aforementioned increase in revenues, excluding the above amount, is attributed to a 12.4% increase in revenues from periodical contributions and fees paid by supervised entities mainly because of the increase of the listed companies' corporate actions in 2023, the increase in the value of trading in the regulated market, and the increase in the fees and contributions paid by foreign supervised entities, as well as a 57.2% in revenues as a result of the year-on-year increase in the trading prices of Greek bonds.*

Expenses for the fiscal year 2023 rose to 11,665 thousand euros from 10,465 thousand euros in 2022 and include the above amount of 1,058.96 thousand euros for the repayment of the aforementioned present, which also appears as revenue for the same year.

The increase in expenses for the year 2023, excluding the above amount, resulted in part from the increase in capital expenditures by 475.8 thousand euros, concerning the acquisition of hardware and software for the upgrading/expansion of the IT infrastructure of the HCMC. It is worth noting that following the relocation of the Hellenic Capital Market Commission in its new offices in December 2022, expenditure for rents and public area use expenses was reduced by 364 thousand euros or 20.7% in 2023, while there were also operating expense savings of 189 thousand euros. As a result of the above, the result for the fiscal year 2023 was a deficit of 795 thousand euros, as compared to a deficit of 1,880 thousand euros in 2022, reduced by 57.7% as shown in the following table.

TABLE 32. HCMC Financial position, 2021-2023

RESULTS	2023 (Amounts in €)	2022 (Amounts in €)	2021 (Amounts in €)	Individual changes 2023-2022 (Amounts in €)	Percentage change 2023 – 2022
Total income	**10,870,053.05**	**8,585,853.25**	**8,767,126.09**		**26.6%**
• Contributions by supervised entities	8,712,022.24	7,747,984.14	7,898,651.46	964,038.10	12.4%
• Financial income	856,726.63	544,864.40	662,019.78	311,862.23	57.2%
• Other income	242,344.18	293,004.71	206,454.85	-50,660.53	-17.3%
• Subsidies for studies and research aimed at	1,058,960.00	0.00	0.00		-

increasing the efficiency of the organisation					
Total expenses	***11,665,021.19***	***10,465,409.17***	***9,968,536.98***		***11.5%***
• *Payroll and Staff Costs*	*5,874,722.23*	*5,726,586.52*	*5,882,273.04*	*148,135.71*	*2.6%*
• *Rents - public use expenses*	*1,396,104.87*	*1,760,125.66*	*1,379,692.70*	*-364,020.79*	*-20.7%*
• *Capital expenditures*	*644,087.75*	*168,270.90*	*376,596.05*	*475,816.85*	*282.8%*
• *Subscriptions to International Organisations*	*1,103,750.82*	*1,034,042.68*	*906,362.91*	*69,708.14*	*6.7%*
• *Operating and other expenses*	*1,587,395.52*	*1,776,383.41*	*1,423,612.28*	*-188,987.89*	*-10.6%*
• *Studies and research aimed at increasing the efficiency of the organisation*	*1,058,960.00*	*0.00*	*0.00*		*-*
Net Result	***-794,968.14***	***-1,879,555.92***	***-1,201,410.89***		***-57.7%***

Source: HCMC

(*) It should be noted that the data for the fiscal years 2022 and 2021 are according to the reports approved by the Ministry of Finance, while the data for 2023 are according to the published data concerning the execution of the Budget.

INTERNATIONAL ACTIVITIES OF THE HELLENIC CAPITAL MARKET COMMISSION

The Hellenic Capital Market Commission and the European Securities and Markets Authority (ESMA)

The European Securities and Markets Authority (ESMA) is an independent EU authority, whose purpose is to safeguard the stability of the European financial system, by ensuring the integrity and transparency of the market, as well as investor protection. It is part of the European System of Financial Supervision (ESFS), along with other two European Supervisory Authorities, the European Banking Authority (EBA) and the European Insurance and Occupational Pensions Authority (EIOPA), the European Systemic Risk Board (ESRB), as well as the national competent authorities.

ESMA achieves its mission and objectives by means of four activities:

- *Assessing risks to investors, markets and financial stability.*
- *Completing a single rulebook for EU financial markets.*
- *Promoting supervisory convergence, and*
- *Directly supervising specific financial agencies.*

The Board of Supervisors of ESMA is the chief ESMA body with decisive competences on major issues, including the issuance of technical standards and guidelines, and also approves the work programme, the annual report, and the budget of ESMA..

The Hellenic Capital Market Commission, as is the case for the regulators of the other 27 member states and the 3 countries of the European Economic Area (EEA) that participate as members without voting rights, is represented at the Board of Supervisors of ESMA by its Chairperson.

Since 1 January 2021, the HCMC, following the unanimous election of its Chairperson by the ESMA Board of Supervisors as a member of the Management Board of ESMA in December 2020, is participating in the Board for the time period until June 2023. Following the re-election of the Chair of the Hellenic Capital Market Commission as a member of the Management Board of ESMA in May 2023, her term was renewed for another 2.5 years, until December 2025. The main role of the Management Board of ESMA is to ensure that the Authority carries out its mission in accordance with the ESMA Regulation and to oversee issues pertaining to the Authority's management and coordination.

Moreover, the Hellenic Capital Market Commission is actively involved, with its specialised and experienced executives, in the work of ESMA's standing working groups and other committees. More specifically:

Risk Standing Committee (RSC)

The Risk Standing Committee assists ESMA in monitoring financial market developments. The main tasks of the RSC are to coordinate capital market risk monitoring and assessment, contributing to ESMA's strategic priorities in the area of effective markets and financial stability, including through the development of risk indicators and the promotion of joint analytical methods and the analysis of developments and trends in capital markets.

The RSC also covers ESMA's analytical work on market developments trends related to sustainable finance, retail investor protection and financial innovation.

In this context, the RSC surveys its members and, based on more general analyses, processed the periodic economic publications of ESMA. The publications include:

- the semi-annual "Trends, Risks and Vulnerabilities" report, on the trends, potential risks and vulnerabilities of the financial system across all markets, see TRV Risk Monitor ESMA Report on Trends, Risks and Vulnerabilities, No. 1, 2023, ESMA50-165-2438/ 9 February 2023 and TRV Risk Monitor ESMA Report on Trends, Risks and Vulnerabilities, No. 2, 2023, ESMA50-1389274163-2681/ 31 August 2023

Moreover, RSC works on capital market studies prepared either by ESMA itself or in cooperation with its members. In 2023, apart from working on the periodic publications mentioned above, RSC focused on studies concerning issues such as:

- the preparation and publication of ESMA's Annual Statistical Report on the performance and costs of retail investment products in the EU - 2022 (ESMA 50-165-2357/30 January 2023);

-the preparation and publication of ESMA's Market Report on EU MMF 2023 (ESMA50-165-2391/ 8 February 2023);

-the preparation and publication of ESMA's Market Report on credit ratings (ESMA50-165-2477/ 25 April 2023);

- the preparation and publication of ESMA's report: ESMA TRV Risk Analysis Orderly Markets Evolution of EEA share market structure since MiFID II 2023 (ESMA50-524821-2954/ 30 October 2023)

-the preparation and publication of ESMA's Market Report on EU Derivatives Markets 2023 (ESMA 50-54821-2930/ 6 December 2023);

Finally, in 2023 the work of the RSC was assisted by two Working Groups, the Financial Stability and Risk Monitoring Working Group (FRWG) as well as the Investor Trends and Research Working Group (IRWG). More specifically,

- *The tasks of the Financial Stability and Risk Monitoring Working Group (FRWG) include: risk monitoring (through the development of risk indicators), risk analysis, and supporting (data-driven) supervisory convergence in the area of financial stability and orderly markets.*
- *The tasks of the Investor Trends and Research Working Group (IRWG) include: risk monitoring (through the development of risk indicators), risk analysis, and supporting (data-driven) supervisory convergence in the area of consumers, sustainable finance and innovation.*

Senior Supervisor Forum- SSF

The Senior Supervisor Forum-(SSF) comprises, through its three alternating sectoral configurations (Markets, Investment Firms, Investment Funds) the Heads of supervision within the respective sectoral area of each national capital market regulator-member of ESMA. The SSF provides expertise on common supervisory issues and ensures consistency in addressing horizontal convergence issues (for example, participation in the preparation of the ESMA Heatmap, a risk classification map per area of supervision, on the basis of which it also participates in the formulation of proposals on the Union Strategic Supervisory Priorities (USSPs) in accordance with the provisions of ESMAR). The SSF also includes a new separate composition, which deals with issues pertaining to the imposition of sanctions as part of the enforcement of legislation concerning the scope of ESMA, with the participation of the Heads of Enforcement of the national capital market regulators-members of ESMA. Moreover, the SSF continues to address horizontal issues through the formation of specific working groups. The main tasks of the SSF include:

- the provision of input, direction and advice on cross-cutting and crossborder supervisory risks;

- the definition of the Union Strategic Supervisory Priorities (USSPs) that will be taken into account by national competent authorities upon preparing their annual work programmes (but possibly also their multi-year strategic plans) and the provision of input, direction and advice on a possible follow up;

- the promotion of continuous discussions and development of an effective EU common supervisory culture, including innovative supervisory tools and methods, as part of a risk-based and outcome focused approach to supervision; and

- the provision of strategic direction to the Enforcement Working Group through the identification of priority topics and sectors, as well as the critical review of its output, promoting the exchange of best enforcement practices in order to foster a common enforcement culture and help facilitate common enforcement action with the overriding aim of ensuring consistency of outcomes for similar infringements across the EU.

ESMA Supervision Policy Committee (EPSC)

ESMA Supervision Policy Committee (ESPC) covers policymaking and supervisory convergence activities related to ESMA's direct supervisory mandates (such as securitisation, TR/STFR, Data reporting service providers, Benchmarks and Credit Rating Agencies), with the exception of Central Counterparties.

The ESPC functions in a horizontal configuration and dedicated sectoral configurations when specific sectoral issues are being discussed, initially on benchmark administrators and credit rating agencies (CRAs). The ESPC also covers convergence work related to supervisory mandates which are shared between ESMA and national competent authorities (e.g., benchmark administrators).

In 2023, the Standing Committee prepared the following documents, which were published by ESMA:

-final report of the ESAs (European Supervisory Authorities) Joint Committee on ESG disclosure for STS securitisations (JC2023 13/24.4.2023);

-updated Q&A on the Securitisation Regulation (ESMA33-128-563/13.7.2023);

- updated Q&A of the ESAs (European Supervisory Authorities) Joint Committee on the Securitisation Regulation (JC2023 2/7.2.2023);

- Consultation Paper on the Securitisation Disclosure Templates in accordance with Article 7 of the Securitisation Regulation (ESMA12-2121844265-3053/21.12.2023);

-Consultation Paper on amendments to Guidelines on position calculation under EMIR (ESMA74-362-2724/28.3.2023);

-Guidelines for reporting under EMIR (ESMA74-362-2281, 23.10.2023);

-updated Q&A on EMIR (ESMA70-1861941480-52/31.3.2023);

-updated Q&A on SFTR data reporting (ESMA74-362-893/7.6.2023);

- final report on the review of the RTS on the form and content of an application for recognition under the Benchmarks Regulation (ESMA81-393-644/30.5.2023);

- report on the sanctions imposed under the Benchmarks Regulation in 2022 (ESMA81-168987738-671/13.12.2023);

-updated Q&A on BMR (ESMA70-145-114/15.12.2023);

-Guidelines on Disclosure Requirements for Initial Reviews and Preliminary Ratings (ESMA 80-416-203/9.6.2023);

-Final Report. EU CLO credit ratings – risk of conflicts of interests relating to methodology changes (ESMA80-189-33520/7.12.2023);

-updated Q&A on the regulation on CRAs (ESMA33-5-87/13.7.2023).

Investor Protection Standing Committee (IPSC)

The Investor Protection Standing Committee (IPSC) has been established in order to promote ESMA's new strategic objective on retail investors and further build on the work of the Investor Protection and Intermediaries Standing Committee (IPISC).

The IPSC supports horizontal investor protection coordination across all ESMA activities, such as the work related to the costs charged to investors. The IPSC also fulfils the role of the "Consumer Protection and Financial Innovation Committee" referred to in the ESMA Regulation. Its remit includes:

Matters of retail investor protection that fall under ESMA's remit and all relevant aspects of the distribution of financial products by intermediaries to retail investors, alongside the coordination of financial education activities; and

Policy and convergence aspects of financial innovation in the retail space (such as dealing with innovative products and distribution channels) and sustainability, whicht have a direct impact on retail investors.

The IPSC also continues to focus on regulatory issues related to the provision of investment services and activities by investment firms and credit institutions, in particular with regards to conduct of business rules, distribution of investment products, investment advice and suitability.

In 2023, the Standing Committee focused on, and prepared, the following documents, which were published by ESMA:

- Guidelines on MiFID II product governance requirements. (ESMA35-43-3448/27.3.2023) and (ESMA35-43-3448/3.8.2023);

- Final Report on the review of the ITS on cooperation in supervisory activities under MiFID II (ESMA35-36-2819/28.3.2023);

- Supervisory Briefing on supervisory expectations in relation to firms offering copy trading services (ESMA35-42-1428/30.3.2023);

- Guidelines on certain aspects of the MIFID II remuneration requirements (ESMA 35-43-3565, 03.04.2023);

- guidelines on certain aspects of the MiFID II appropriateness requirements (ESMA35-43-3172/3.4.2023);

-guidelines on common EBA/ESMA procedures and methodologies for the supervisory review and evaluation process (SREP) under the systemic Investment Firms Directive (ESMA35-36-2621/19.4.2023);

-ESMA statement highlighting the risks arising from the provision of unregulated products and/or services by investment firms (ESMA35-36-2813/25.5.2023);

-Call for evidence on the integration of sustainability preferences in the suitability assessment and product governance arrangements (ESMA35-43-3599/16.6.2023);

-report on sanctions and measures imposed by national competent authorities under MiFID II in 2022 (ESMA35-43-335435667-4321/7.7.2023);

-Supervisory briefing on understanding the definition of advice under MiFID II (ESMA35-43-3861/11.7.2023);

- paper on the review of technical standards under Article 34 of MiFID II (ESMA35-36-2848/11.7.2023);

- Public Statement on securities lending in relation to retail client financial instruments and clarifying certain important MiFID II investor protection requirements (ESMA35-335435667-4342/12.7.2023);

- Public Statement: ESMA presents the results of the 2022 Common Supervisory Action (CSA) and Mystery shopping exercise on MiFID II requirements on information on costs and charges (ESMA35-43-3547/16.7.2023);

- consultation paper on MiFID II investor protection topics linked to digitalisation (ESMA35-43-3682/14.12.2023);

- updated Q&As on the European crowdfunding service providers for business Regulation(ESMA35-42-1088/15.12.2023);

-updated Q&As on MiFID II and MiFIR investor protection topics (ESMA35-43-349/15.12.2023).

Sustainability Standing Committee (SSC)

The Sustainability Standing Committee (SSC) has a dual role as (i) a "consultative" and coordination group providing internal advice and expertise to sectoral standing committees on files for which Sustainable Finance (SF) expertise is required and (ii) the primary responsible group on SF files which are transversal by nature (such as taxonomy and greenwashing). The SSC also promotes the coordination of regulatory, supervisory and enforcement initiatives across securities regulators in the EU and across ESMA activities, in the field of sustainable finance.

In 2023, the Standing Committee focused on, and prepared, the following documents, which were published by ESMA:

-Progress Report on Greenwashing (ESMA30-1668416927-2498/31.5.2023);

- Concepts of sustainable investments and environmentally sustainable activities in the EU Sustainable Finance framework (ESMA30-379-2279/22.11.2023).

- Concept of estimates across the EU Sustainable Finance framework (ESMA30-1668416927-2548/22.11.2023).

Digital Finance Standing Committee (DFSC)

The Digital Finance Standing Committee (DFSC) has been established to support ESMA's work related to digital innovation across different subject areas. The DFSC in particular enables the effective undertaking of the relevant policy and convergence work in the area of Digital Finance (legislative proposals such as MiCA, DORA, DLT pilot regime, and areas such as Artificial Intelligence and cybersecurity) and reflects the importance of technological innovation for securities and derivatives markets in line with the new ESMA strategy.

In 2023, the Standing Committee focused on, and prepared, the following documents, which were published by ESMA:

-TRV article: Artificial intelligence in EU securities markets (ESMA50-164-6247/1.2.2023);

- Guidelines on standard forms, formats and templates to apply for permission to operate a DLT market infrastructure. (ESMA70-460-213/8.3.2023);

-updated Q&As On the implementation of Regulation (EU) 2022/858 on a pilot regime for market infrastructures based on distributed ledger technology (ESMA70-460-189/2.6.2023);

- Consultation Paper on the Technical Standards specifying certain requirements of Regulation (EU) 2023/1114 (Markets in. Crypto Assets Regulation, MiCA) (ESMA74-449133380-425/12.7.2023);

-Report on the DLT Pilot Regime – Study on the extraction of transaction data (ESMA12- 2121844265-3182/5.10.2023);

- Report on the DLT Pilot Regime - Study on how financial instrument transactions are registered in various Distributed Ledger Technologies (ESMA12-2121844265-3183/5.10.2023);

- Second Consultation Paper on the Technical Standards specifying certain requirements of Regulation (EU) 2023/1114 (Markets in. Crypto Assets Regulation, MiCA) (ESMA74-453128700-438/5.10.2023);

-Report titled: Update on the functioning of Innovation Facilitators –innovation hubs and regulatory sandboxes (ESA 2023 27/11.12.2023).

IT Standing Committee (ITSC)

The IT Standing Committee (ITSC), formerly referred to as the IT Management and Governance Committee (ITMG) continues to operates focusing its work on IT governance, exchange of data & information between national competent authorities and ESMA. Its work contributes to the design, implementation, and operation of pan-European IT projects. The main objective of the projects is to ensure the compliance of national competent authorities with the obligations emanating from the relevant European legislation and ensure that the cost of the requisite data management shall be proportional to the corresponding benefit.

In 2023, the main work of the Committee was to elaborate on IT projects, IT strategy and methodology, and technical instructions concerning operational and technical requirements, test specifications for IT projects and IT interfaces, mostly projects concerning ESMA in cooperation with the national competent authorities.

Data Standing Committee (DSC)

The Data Standing Committee (DSC), in the context of its widened mandate, contributes to the work of ESMA on issues pertaining to 1/ the improvement of the quality of both regulatory data, as well as market data disclosed to national authorities; 2/ basic data infrastructure, ensuring stability and consistency among different data reporting regimes; 3/ the promotion of data-driven supervision; and 4/ the promotion of supervisory convergence as foreseen in the ESMA 2023-2025 Strategic Orientation.

Moreover, as regards the revised text of its powers, the DSC shall refer, to the relevant standing committee, any potential threats that are relevant to ESMA's objectives of ensuring investor protection, orderly functioning and integrity and stability of financial markets (product intervention powers).

More specifically, the DSC contributes to the work of ESMA on issues pertaining to regulatory and market data reporting, the reporting of investment positions in derivatives, transactions in financial Instruments, record-keeping of orders, instrument reference data, transparency data, max transaction *thresholds, alternative investment fund manager reporting requirements, approved prospectuses and the relevant meta-data, as well as money market fund reporting requirements.*

In 2023, the Standing Committee focused on, and prepared, the following documents, which were published by ESMA:

-Preliminary data report on the introduction of the market correction mechanism (ESMA70-446-775/23.1.2023);

-Final Report on ESMA's Opinion on the trading venue perimeter (ESMA70-156-6360/2.2.2023);

- updated Q&A on the implementation of EMIR (ESMA70-1861941480-52/31.3.2023);

- updated Q&A concerning transaction reporting under SFTR (ESMA70-362-893/7.6.2023);

Also, in 2023 the SC implemented the data quality framework of MMFR, AIFMD, FITRS, DVCAP.

ESMA Sectoral Standing Committees

Issuers Standing Committee (ISC)

The Issuers Standing Committee (ISC) works on various regulatory aspects of issuer information and combines the scopes of the previous Corporate Reporting Standing Committee (CRSC) and Corporate Finance Standing Committee (CFSC), including how to improve issuers information to the market – especially in relation to the development of the sustainability reporting standards. The scope of the ISC includes contributing to and/or monitoring of regulatory developments as well as ensuring appropriate supervisory convergence on issues such as:

- financial and sustainability reporting as defined by the Transparency Directive, the Accounting Directive, the IAS Regulation and the Corporate Sustainability Reporting Directive (CSRD);

- the prospectus, as defined by the Prospectus Regulation, as well as specific aspects related to Take-Over bids, and major shareholding reporting; as well as

- corporate governance, as well as the new Corporate Sustainability Due Diligence Directive.

Finally, the ISC contributes to the improvement of methods for complying with the issuers' annual financial reporting obligation, in accordance with the Transparency Directives, through electronic reporting, the storage of regulated information as well as the audit of financial and non-financial regulated information in cooperation with the DSC.

In 2023, the Standing Committee prepared the following documents, which were published by ESMA:

- opinion on the technical advice by the European Financial Reporting Advisory Group on European Sustainability Reporting Standards (ESMA32-334-589/26.1.2023);

- letter to the International Accounting Standards Board (IASB) and the European Financial Reporting Advisory Group (EFRAG) on the IASB's Exposure Draft International Tax Reform – Pillar Two Model Rules (IASB: ESMA32-61-505/27.2.2023 and EFRAG: ESMA32-61-506/27.2.2023);

- report on the enforcement and regulatory activities of European Accounting Enforcers in 2020, as regards financial statement issuer compliance with the IFRS for 2022 (ESMA32-63-1385/29.3.2023);

- publication of selected enforcement decisions from ESMA's database (27th Extract from the EECS's Database of Enforcement) on the application of IFRS, taken by national regulators in the period December 2020-January 2023 (ESMA32-63-1465/17.5.2022);

- announcement concerning the postponement until 2024 of the annual update of the Regulatory Technical Standard (RTS) of the European Single Electronic Format (ESEF) for changes in IFRS (10.5.2023);

- letter to the IFRS Interpretation Committee for comments concerning the tentative agenda decision on Premiums Receivable from an Intermediary (IFRS 17 and IFRS 9) (ESMA32-1188985980-272/22.5.2023);

- list of national thresholds below which the obligation to publish a prospectus does not apply (ESMA31-62-1193/3.7.2023);

- letter to the International Accounting Standards Board (IASB) and the European Financial Reporting Advisory Group (EFRAG) on the IASB's Exposure Draft Amendments to the Classification and Measurement of Financial Instruments (IASB: ESMA32-1188985980-276/13.7.2023 and EFRAG: ESMA32-1188985980-275/13.7.2023);

- report on the Implementation of SRD2 provisions on proxy advisors and the investment chain (ESMA32-380-267/27.7.2023);

- letter to the International Sustainability Standards Board (ISSB) on the consultation on Agenda Priorities, mainly concerning the development of implementation support material for 'IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information' and 'IFRS S2 Climate-related Disclosures', as well as the research and development of domestic standards (ESMA32-992851010-1018/2.8.2023);

- letter to the International Sustainability Standards Board (ISSB) on the consultation to enhance the international applicability of the Sustainability Accounting Standards Board Standards (SASB Standards) (ESMA32-992851010-1019/2.8.2023);

- revised manual for the preparation of Annual Financial Reports of European issuers on the basis of the European Single Electronic Format (ESEF) with track changes (ESMA32-60-254rev/31.8.2023);

- letter to the International Accounting Standards Board (IASB) and the European Financial Reporting Advisory Group (EFRAG) on the IASB's Request for Information on the Post Implementation Review of

IFRS 9 – Impairment (IASB: ESMA32-1188985980-283/27.9.2023 and EFRAG:ESMA32-1188985980-284/27.9.2023);

- publication of selected enforcement decisions from ESMA's database (28th Extract from the FRWG (EECS)'s Database of Enforcement) on the application of IFRS, taken by national regulators in the period June 2022-July 2023 (ESMA32-193237008-3341/9.10.2023);

- letter to the International Accounting Standards Board (IASB) and the European Financial Reporting Advisory Group (EFRAG) on the IASB's Request for Information on the Post Implementation Review of IFRS 15 – Revenue from Contracts with Customers (IASB: ESMA32-1283113657-1080/17.10.2023, EFRAG: ESMA32-1283113657-1118/17.10.2023);

- ESMA statement on European Common Enforcement Priorities for 2023 annual financial reports, for the uniform implementation of International Financial Reporting Standards (IFRS) and the harmonisation of non-financial reporting (ESMA32193237008-1793/25.10.2023);

- report on the results of a fact-finding exercise on corporate reporting practices under the Taxonomy Regulation (ESMA32-992851010-1098/25.10.2023);

- report on the disclosures of climate-related matters in the financial statements (ESMA32-1283113657-1041/25.10.2023);

- letter to the International Auditing and Assurance Standards Board (IAASB) on the Proposed International Standard on Sustainability Assurance (ISSA) 5000), as well as on the general requirements for Sustainability Assurance Engagements (ESMA32-389550249-174/28.11.2023);

- letter to the International Accounting Standards Board (IASB) on the IASB's Exposure Draft Annual Improvements – Volume 11 (ESMA32-64431002-518/7.12.2023);

- publication of updated European Single Electronic Format (ESEF) XBRL taxonomy files and ESEF Conformance Suite (7.12.2023);

- consultation paper on Draft Guidelines on Enforcement of Sustainability Information (GLESI) for the period 15.12.2023 to 15.03.2024 (ESMA32-992851010-1016/15.12.2023).

Markets Standing Committee (MSC)

The Markets Standing Committee (MSC) follows the work previously done in the Secondary Markets Standing Committee (SMSC), the Market Integrity Standing Committee (MISC), the Post Trading Standing Committee (PTSC) and the Commodity Derivatives Task Force (CDTF) focusing on different regulatory aspects of market and market infrastructure. More specifically, the Committee's work includes market monitoring, policy and convergence work in the respective areas (e.g MiFID, MiFIR, EMIR, CSDR, as well as MAR and SSR). The focus of the MSC includes work on:

-the structure, transparency and efficiency of secondary markets for financial instruments, including trading platforms and OTC markets (including regulated markets, MTFs, systematic internalisers or other platforms);

-issues relating to market integrity and surveillance, the enforcement of securities laws, the facilitation of co-operation of national authorities and the exchange of information in market abuse investigations;

-post-trading market infrastructures or post-trading processes or operations, such as the clearing and settlement of transactions in financial instruments;

-the monitoring and analysis of regulatory and industry developments in the field of commodity derivative markets; and

-the managing of the co-operation between financial regulators/ESMA and other regulatory and supervisory authorities such as the Agency for the Cooperation of Energy Regulators (ACER) and national energy regulators within the scope of wholesale energy markets.

In 2023, the work of the Standing Committee and its subgroups focused on the preparation of the following documents that were published by ESMA:

-Consultation Paper concerning a manual on post-trade transparency (ESMA70-156-6307/19.1.2023)

-Final Report on ESMA's Opinion on the trading venue conceptual perimeter (ESMA70-156-6560/2.2.2023);

- co-operation between ESMA and ACER to strengthen oversight of energy and energy derivative markets (18.11.2022);

- ESMA letter to the Council of the European Union regarding concerns with changes to the insider list regime (ESMA24-436-1547/10.3.2023);

- updated Q&A on the implementation of CSDR (ESMA70-156-4448/13.3.2023);

- public statement on the derivative trading obligation in the context of the migration of credit default swap contracts out of ICE Clear Europe (ESMA70-156-6473/30.3.2023);

- Technical Reporting Instructions. CSDR Article 9 - Internalised Settlement Reporting (ESMA65-8-6560/30.3.2023);

-an updated Q&A on MiFIR data reporting (ESMA70-1861941480-56/31.3.2023);

- ESMA opinion on position limits on CORN contract (ESMA70-155-13071/3.5.2023);

- ESMA opinion on position limits on RAPESEED contract (ESMA70-155-13070/3.5.2023);

- ESMA opinion on position limits on milling wheat (ESMA70-155-13072/3.5.2023);

- final report on market outages (ESMA70-156-6458/24.5.2023);

-letter to the European Commission on the MiFIR review – transparency regime for single name-CDS and standardised OTC-derivatives (ESMA74-1658524332-687/2.6.2023);

- final report on the implementation and functioning of the Intra-day Volatility. Management Mechanism (ESMA70-156-6509/30.6.2023);

- manual on post-trade transparency under MiFID II/ MiFIR (ESMA74-2134169708-6870/10.7.2023) and final report (ESMA74-2134169708-6797/10.7.2023);

-ESMA Report on pre-hedging (ESMA70-449-748/12.7.2023);

- ESMA Report on Suspicious Transaction and Order Reports (STORs) (ESMA74-1103241886-880/17.7.2023);

- ESMA opinion on position limits on fish pool farmed salmon contract (ESMA70-186519303-15385/14.9.2023);

- consultation paper on shortening the settlement cycle (ESMA74-2119945965-1616/5.10.2023);

- supervisory briefing on the calibration of circuit breakers (ESMA74-2134169708-6975/12.10.2023);

-an updated Q&A on MiFID II/MiFIR market infrastructures topics (ESMA70-872942901-38/13.10.2023);

- updated Q&A concerning transparency topics under MiFID II/MiFIR (ESMA70-872942901-35/27.10.2023);

- Consultation Paper on technical advice on the CSDR penalty mechanism (ESMA74-2119945925-1634/15.12.2023).

Investment Management Standing Committee (IMSC)

The Investment Management Standing Committee is responsible for monitoring the regulatory framework and supervisory practices regarding collective investment management and harmonised and non-harmonised investment funds. The Committee is responsible for addressing issues related to Directive (EC) 2009/65 on undertakings for collective investment in transferable securities (UCITS), as well as Directive (EU) 2011/61 on Alternative Investment Fund Managers. The Standing Committee is also responsible for developing ESMA policy in relation to Regulation (EU) 345/2013 on European venture capital funds (EuVECA), Regulation (EU) 346/2013 on European social entrepreneurship funds (EUSEF), Regulation (EU) 2015/760 on European long-term investment funds (ELTIF), Regulation (EU) 2017/1131 on money market funds, as well as Regulation (EU) 2019/1156 and Directive (EU) 2019/1160 on facilitating the cross-border distribution of collective investment undertakings.

In 2023, the Standing Committee focused on, and prepared, the following documents, which were published by ESMA:

-ESMA statistical report on costs and performance of EU retail investment products in 2023 (ESMA50-165-2387/17.1.2023);

- guidelines on stress test scenarios pursuant to the MMF Regulation (ESMA34-164-6583/27.1.2023);

- annual statistical report 2023 on EU money market funds (ESMA50-165-2391/8.2.2023);

-updated Q&A concerning the implementation of the EuSEF and EuVECA regulations (ESMA34-36-253 /10.3.2023);

-opinion on undue costs of UCITS and AIFs (ESMA34-45-1747/17.5.2023);

- consultation paper on the draft regulatory technical standards under the revised ELTIF Regulation (ESMA34-130002321-124/23.5.2023);

- report on the results of common supervisory action in 2022 concerning the valuation of UCITS/AIFs (ESMA34-45-1802/24.5.2023);

- statistical report on stress testing money market funds in the EU – first evidence from fund reporting (ESMA60-1389274163-2560/6.6.2023);

-updated Q&A concerning the implementation of the AIFMD Directive (ESMA34-32-352 /14.6.2023);

-updated Q&A concerning the implementation of the UCITS Directive (ESMA34-43-392/14.6.2023);

- report on marketing requirements and marketing communications under the Regulation on cross-border distribution of funds (ESMA34-451814/3.7.2023);

-report on sanction and measures imposed under the UCITS directive in 2022 (ESMA34-1921782652-1922/18.7.2023);

-report on sanction and measures imposed under the AIFM directive in 2022 (ESMA34-1985693317-1074/18.7.2023);

- statement concerning an update on the guidelines on funds' names using ESG or sustainability-related terms (ESMA34-1592494965-554/14.12.2023);

-ESMA statistical report on costs and performance of EU retail investment products in 2023 (ESMA50-524821-3052/18.12.2023).

CCP Policy Committee

The CCP Policy Committee deals with issues pertaining to the assessment of risks for investors, markets and financial stability, including the specification of organisation, conduct and prudential supervision *requirements applicable to central counterparties as financial market infrastructures. It also promotes supervisory convergence through the development of Q&As or opinions related to CCP issues under EMIR or Regulation (EU) 2021/23 on a framework for the recovery and resolution of central counterparties (only on recovery-related topics). It establishes a single rulebook on EU financial markets by developing guidelines on CCP issues under EMIR, as well as by developing new, or, whenever necessary, revising existing technical standards under EMIR, which concern CCPs, as well as under Regulation (EU) 2021/23 on a framework for the recovery and resolution of central counterparties (only on recovery-related topics). Moreover, it prepares reports on the revision or possible extensions of EMIR, or similar reports related to other EU legislation on issues affecting CCPs, apart from those that must be prepared by the CCP Supervisory Committee, in accordance with EMIR. Finally, it develops technical advice on central counterparty-related topics.*

In 2023, the Standing Committee focused on, and prepared, the following documents, which were published by ESMA:

- preliminary data report on the introduction of the market correction mechanism (ESMA70-446-775/23.1.2023),

- guidelines on CCP recovery plan indicators (article 9 para. 5 of CCPRRR) (ESMA91-372-1702/31.1.2023);

- effects assessment of the impact of the market correction mechanism on financial markets (ESMA70-445-794/1.3.2023);

- guidelines on CCP recovery plan scenarios (article 9 para. 12 of CCPRRR) (ESMA91-372-1701/31.1.2023);

- final report - draft regulatory technical standards on CCP business reorganisation plans (ESMA91-372-2193/29.3.2023);

- final report on the framework for the 5th ESMA stress test exercise for central counterparties (ESMA91-372-2557/31.5.2023);

- guidelines on the consistent application of the triggers for the use of Early Intervention Measures (article 18, para. 8 of CCPRRR) (ESMA91-372-1709/1.6.2023);

- guidelines on the application of the circumstances under which a central counterparty is deemed to be failing or likely to fail (article 22, para. 6 of CCPRRR) (ESMA91-372-2070/1.6.2023);

- guidelines further specifying the circumstances for temporary restrictions in the case of a significant non-default event in accordance with Article 45a of EMIR (ESMA91-372-1704/02.06.2023);

- final report –review of the RTS with respect to the procyclicality of CCP margin (ESMA91-1505572268-3217/19.7.2023);

- final report on the extension of emergency measures on CCP collateral requirements (ESMA91-1505572268-3317/4.10.2023);

- opinion on CCP back testing (ESMA91-372-2811/16.10.2023).

Proportionality and Co-ordination Committee (PCC)

As part of the revision of Regulations on European Supervisory Authorities (ESAs Review – Regulation (EU) 2019/2175), including ESMA, it was decided to establish, as an integral part of ESMA, a Committee on Proportionality the role of which is to advise ESMA on how, in full compliance with the applicable rules, its actions and measures should take into account differences prevailing in the field of transferable securities and financial markets, as regards the nature, scale and complexity of risks, business models and practices, and the size of financial institutions and of markets, to the extent these factors are relevant to the rules under consideration. As part of the reform of ESMA's Standing Committees, the Advisory Proportionality Committee was renamed to Proportionality and Co-ordination Committee .

During 2023, the Standing Committee mostly dealt with issues arising as part of achieving the supervisory convergence objective, following the changes adopted in the context of the ESAs' Review. Among other thins, it participated and expressed its opinion in ESMA's report on the independence of national competent authorities (ESMA42-110-3265/18.10.2021), in the peer review work plan for 2024-2025 (as part of the Annual Work Programme of ESMA for the year 2024 (ESMA20-50751485-1368/28.9.2023)), as well as in the work for establishing a system for the exchange of information on fitness issues, in accordance with Article 31a of the ESMA Regulation (Regulation EU 1095/2010, as currently in force).

CCP Supervisory Committee

The Central Counterparties Supervisory Committee (CCPSC) has been established under Regulation (EU) 648/2012 on OTC Derivatives, Central Counterparties and Trade Repositories (European Markets Infrastructure Regulation - EMIR), as amended by EMIR 2.2 (Regulation (EU) 2019/2099) as a permanent internal committee of ESMA, reporting to the Board of Supervisors, which remains the final decision-making body for all draft decisions prepared by the CCPSC.

The Central Counterparties Supervisory Committee has a specific role/specific tasks in relation to central counterparties established in the EU (EU-CCPs), in order to enhance supervisory convergence and ensure a resilient environment for their operation.

More specifically, its role concerns:

- the preparation of opinions on draft decisions by a national competent authority concerning the compliance of an EU-CCP with certain requirements of EMIR;

- the annual peer review on the supervision of EU CCPs;

- the annual ESMA CCP Stress Tests; and

- the preparation of decisions on the validation of significant changes to CCP risk models.

The CCP Supervisory Committee is also responsible for certain tasks in relation to CCPs established in third countries (TC-CCPs), as part of the new supervisory responsibilities for ESMA as regards TC-CCPs, with the objective to ensure the adequate monitoring and management of the risk they may pose to the EU. This relates, in particular, to the preparation of decisions regarding the recognition of TC-CCPs and the supervision of Tier 2 CCPs, including the tiering and comparable compliance assessments, as well as the review of recognitions.

In 2023, the CCP Supervisory Committee focused on, and prepared, the following documents, which were published by ESMA:

-Consultation Paper. Draft Technical advice to the European Commission on fees charged to Tier 1. Third-Country CCPs under EMIR (ESMA91-2145765636-8277/12.10.2023);

- peer review 2022 on due diligence of clearing members (ESMA91-1505572268-3108/12.12.2023).

ESMA Resolution Committee

The ESMA Central Counterparty Resolution Committee (hereinafter "ESMA Resolution Committee") was established in implementation of article 5 of Regulation (EU) 2021/23 on a framework for the recovery and resolution of central counterparties. The ESMA Resolution Committee issues guidelines to promote the preparation and coordination of resolution plans and the development of methods for the resolution of central counterparties that are about to fail.

In 2023, the ESMA Resolution Committee focused on, and prepared, the following documents:

- ESMA Guidelines on the application of the circumstances under which a central counterparty is deemed to be failing or likely to fail (ESMA91-372-2070/1.6.2023);

- ESMA guidelines further specifying the circumstances for temporary restrictions in the case of a significant non-default event in accordance with Article 45a of EMIR (ESMA91-372-1704/02.06.2023);

- guidelines on the methodology to be used by the resolution authority for determining the valuation of contracts prior to their termination as referred to in Article 29 paragraph 1 of CCPRRR ESMA 91-372-206, 02.06.2023);

- final report on draft guidelines on written agreements and procedures for the operation of resolution colleges (ESMA91-372-1958/23.6.2023);

- final report – guidelines on the summary of resolution plans (ESMA91-372-2345/23.6.2023).

Participation in working groups as part of the Joint Committee of European Supervisory Authorities (ESAs)

Sub-Committee of the Joint Committee of the three European Supervisory Authorities (ESAs) on Investor Protection and Financial Innovation

This sub-committee works on investor protection and financial innovation issues of concern to the three European Supervisory Authorities (ESAs), namely EBA, ESMA and EIOPA.

During 2023, the sub-committee worked on PRIIPS matters (preparation of new questions and answers on the PRIIPs Key Information Document (JC 2017 49/21.12.2022)), a consultation paper on the review of of SFDR Delegated Regulation with draft regulatory technical standards with regard to the content, methodologies and presentation of sustainability disclosures pursuant to Regulation (EU) 2019/2088 (JC 2023 09/12.4.2023), as well as on investor protection matters, in particular through the publication of two factsheets: the first titled "How do inflation and the rise in interest rates affect my money?" (May 2023) and the second titled "Investment, loans, insurance or pensions with a sustainable focus: what do you need to know>" (November 2023).

Sub-Committee of the Joint Committee of European Supervisory Authorities (ESAs) on securitisation

This sub-committee works on securitisation-related issues of concern to the three European Supervisory Authorities (ESAs), namely EBA, ESMA and EIOPA.

During 2023, the sub-committee, which is chaired by the Chairperson of the Hellenic Capital Market Commission, continued its work on finalising the advice of the joint committee to the European Commission on the review of the securitisation prudential framework.

Sub-Committee of the Joint Committee of European Supervisory Authorities (ESAs) on digital operational resilience (DORA)

During 2023, the work of the Sub-Committee led to the preparation of the following:

- consultation paperon draft Regulatory Technical Standards to further harmonise ICT risk management tools, methods, processes and policies under articles 15 and 16 paragraph 3 of Regulation (EU) 2022/2554 (JC 2023 39/19.6/2023);

- consultation paper on Draft Regulatory Technical Standards on specifying the criteria for the classification of ICT related incidents, materiality thresholds for major incidents and significant cyber threats under Regulation (EU) 2022/2554 (JC 2023 34/19.6.2023);

- consultation paper on draft Implementing Technical Standards to establish the templates composing the register of information in relation to all contractual arrangements on the use of ICT services provided by ICT third-party service providers as mandated by Regulation (EU) 2022/2554 (JC 2023 36/19.6.2023);

- consultation paper on Draft Regulatory Technical Standards to specify the detailed content of the policy in relation to the contractual arrangements on the use of ICT services supporting critical or important functions provided by ICT third-party service providers as mandated by Regulation (EU) 2022/2554 (JC 2023 35/19.6.2023);

- report of the ESA Joint Committee on ICT third-party service providers (JC 2023 22/19.9.2023);

- technical advice of the ESA Joint Committee on two delegated acts pursuant to the DORA regulation specifying further criteria for critical ICT third-party service providers (JC 2023 23/29.9.2023).

Moreover, the Sub-Committee worked on the final texts of the first package of draft Technical Standards under Regulation (EU) 2022/2554 (DORA Regulation):

- final report on Draft Regulatory Technical Standards on specifying the criteria for the classification of ICT related incidents, materiality thresholds for major incidents and significant cyber threats under Regulation (EU) 2022/2554 (JC 2023 83);

- final report on draft Implementing Technical Standards to establish the templates composing the register of information in relation to all contractual arrangements on the use of ICT services provided by ICT third-party service providers as mandated by article 28(9) of Regulation (EU) 2022/2554 (JC 2023 85);

- final report on Draft Regulatory Technical Standards to specify the detailed content of the policy in relation to the contractual arrangements on the use of ICT services supporting critical or important functions provided by ICT third-party service providers as mandated by Regulation (EU) 2022/2554 (JC 2023 84);

- final report on draft Regulatory Technical Standards to further harmonise ICT risk management tools, methods, processes and policies under articles 15 and 16 paragraph 3 of Regulation (EU) 2022/2554 (JC 2023 86).

Finally, the final consultation papers on the second package of draft Technical Standards under the DORA Regulation were published during 2023:

- consultation paper on draft Joint Guidelines on the estimation of aggregated annual costs and losses caused by major ICT-related incidents (JC 2023 68/27.11.2023);

- consultation paper on Draft Regulatory Technical Standards to specify the elements which a financial entity needs to determine and assess when subcontracting ICT services supporting critical or important functions as mandated by Article 30(5) of Regulation (EU) 2022/2554 (JC 2023 67/27.11.2023);

- consultation paper on Draft Regulatory Technical Standards on the harmonisation of conditions enabling the conduct of the oversight activities under Article 41(1) points (a), (b) and (d) of Regulation (EU) 2022/2554;

- consultation paper on Draft Regulatory Technical Standards on the content of the notification and reports for major incidents and significant cyber threats and determining the time limits for reporting major incidents and Draft Implementing Technical Standards on the standard forms, templates and procedures for financial entities to report a major incident and to notify a significant cyber threat (JC 2023 70/8.12.2023);

- consultation paper on Draft joint guidelines on the oversight cooperation and information exchange between the ESAs and the competent authorities under Regulation (EU) 2022/2554 (JC 2023 71/8.12.2023);

- consultation paper on Draft Regulatory Technical Standards specifying elements related to threat led penetration tests (JC 2023 72/8.12.2023).

The HCMC and European institutional bodies and instruments

European Systemic Risk Board

The aim of the European Systemic Risk Board is to prevent the systemic risks that threaten the stability of the financial system in the European Union and avert any serious adverse effects on the financial system and the economy at large. The Hellenic Capital Market Commission participates in the General Board and the Advisory Technical Committee.

European Council, European Commission

In 2023, the Hellenic Capital Market Commission participated in the technical level discussions for the following dossiers that were submitted to the European Council: the legislative package for adressing concentration risk from exposures to central counterparties and counterparty risk in centrally-cleared derivatives markets (EMIR Review), the proposal for a Regulation on the introduction of a European green bond standard (EuGB), the proposal for a directive on EU retail investor protection (Retail Investment Strategy), the proposal for a directive on the review of the directive on alternative Investment fund managers (AIFMD Review), as well as the legislative packages for the review of the markets in financial instruments Regulation (MiFID/MIFIR Reviews), the creation of a European single access point (ESAP), to make public capital markets in the EU more attractive to companies and facilitate the access of small and medium-sized enterprises to funding (CMU listing package).

In addition, in 2023 the Hellenic Capital Market Commission participated in the work of the Expert Group of the European Securities Committee (EGESC), the Informal Company Law Expert Group, and the working group on CSDR review.

The Hellenic Capital Market Commission and IOSCO

The International Organization of Securities Commissions (IOSCO), is the main forum of international cooperation among capital market regulators and is the international agency responsible for the establishment of standards for the financial markets. Currently, IOSCO has 131 ordinary members from more than 100 countries. The Hellenic Capital Market Commission is represented in the proceedings of the European Regional Committee, in the Presidents' Committee, which comprises all Presidents (Chairs) of IOSCO members, as well as in the IOSCO Board as the representative of the European Regional Committee by its Chairperson. In 2023, the Hellenic Capital Market Commission was assigned with hosting, the 49th Annual Conference of IOSCO, in May 2024 in Greece for the first time in more than 40 years of the international organisation's operation.

The Hellenic Capital Market Commission is also actively involved in the working groups of IOSCO Committee 4, whose work concerns the prevention and detection of capital market violations at the international level, mainly through the enhancement and encouragement of collaboration among regulators. Moreover, the Hellenic Capital Market Commission participates in the work of the IOSCO Screening Group, which evaluates potential signatories of the IOSCO Multilateral Memorandum of Understanding (IOSCO MMoU), as well as the new Enhanced Multilateral Memorandum of Understanding (Enhanced MMoU – EMMoU), which was adopted by IOSCO in April 2017. The EMMoU extends the scope of mutual assistance among regulators, by adding, among other things, new types of confidential information regulators will be able to exchange. These new types of information and/or assistance are the following: information about persons owning or controlling other persons or assets; information about audits, especially the audits of financial statements; compelling physical attendance for testimony in front of the assisting authority; power to freeze assets, when allowed by the law; and data traffic records.

The Hellenic Capital Market Commission and other international bodies

Mediterranean Partnership Of Securities Regulator

The Mediterranean Partnership of Securities Regulators (MPSR) comprises Algeria, Cyprus, Egypt, Greece, Italy, Morocco, Portugal, Spain, Tunisia, and Turkey, and its purpose is to develop complementary actions and ensure the implementation of IOSCO's principles by the securities regulators of this region.

Organisation of Economic Cooperation and Development

The Organisation for Economic Co operation and Development (OECD) aims at promoting policies for the improvement of economic and social welfare. The Hellenic Capital Market Commission monitors the work of the Corporate Governance Committee, as well as the work of the Task Force on Financial Consumer Protection.

Financial Action Task Force

The Financial Action Task Force is an international policy-making body, which establishes international standards for suppressing money laundering and terrorist financing. The Hellenic Capital Market Commission monitors the work of the Task Force both at the plenary, and at the individual working group levels.

Bilateral Memoranda of Understanding

The purpose of Memoranda of Understanding (MoU) is to establish and implement a procedure for the provision of assistance among competent authorities for the supervision of the capital market, in order to help them perform their functions. These Memoranda enable supervisory authorities to exchange confidential information, in order to exercise supervision and achieve compliance of the supervised agents of the market with the existing institutional regulations. The memoranda of understanding between the supervisory authorities of different countries facilitate international co-operation between stock exchanges, companies and other capital market agents, and therefore are the first stage for the establishment and further improvement of the relations among these countries' capital markets. In the context of the new European architecture for the supervision of financial markets, MOUs play a key role, since they are instrumental in the move towards the single supervision of the European market. Up to this date, the Hellenic Capital Market Commission has signed 27 bilateral and 4 multilateral Memoranda of Understanding.

PROVISION OF INVESTMENT SERVICES AND MARKETING BY MEANS OF THE "EUROPEAN PASSPORT"

Provision of investment services as part of Directive 2014/65/EU on markets in financial instruments (MiFID) by EEA investment firms and banks

At the end of 2023, the number of investment firms and banks originating in 24 of the 28 EEA countries that provided investment services in Greece by means of the so-called "European Passport", either without establishment or with physical presence through the establishment of a branch or a tied agent, registered a spectacular year-on-year increase, i.e. 45% and stood at 1,090 (see Table 33).

More specifically, as regards the distribution of undertakings per country, following the exit of the UK from the EU the first place, as in 2022, is still held by Cyprus with 293 firms, followed by Germany with

126, Finland with 110, France with 96, the Netherlands with 86, Ireland with 81, and Luxembourg with 68 firms.

TABLE 33. Provision of Investment Services (MiFID) in Greece by EEA investment firms and banks, 2021-2023

Country	Total active passports		
	2023	2022	2021
Austria	44	22	34
Belgium	11	8	9
Bulgaria	12	7	7
France	96	69	70
Germany	126	91	108
Denmark	10	3	7
Estonia	6	4	2
Ireland	81	69	66
Italy	13	10	11
Iceland	1	1	1
Spain	29	15	14
Croatia	0	0	1
Cyprus	293	233	241
Latvia	4	3	3
Lithuania	2	0	0
Lichtenstein	5	15	17
Luxembourg	68	55	56
Malta	39	31	35
Norway	21	18	17
Netherlands	86	65	63
Hungary	5	2	4

Country	Total active passports		
	2023	2022	2021
Poland	3	2	1
Portugal	7	5	5
Slovakia	4	2	3
Slovenia	1	1	1
Sweden	7	5	8
Czechia	6	6	4
Finland	110	8	1
Total	**1090**	**750**	**789**

Source: HCMC

Moreover, during 2023, 24 investment firms that have been authorised by the Hellenic Capital Market Commission provided investment services in EEA countries, of which 5 firms established a physical presence.

Provision of Investment Services set out in Directive 2014/65/EU (MiFID) by EEA Alternative Investment Fund Managers (AIFMs)

By the end of 2023, the number of EEA AIFMs providing investment services (MiFID) in Greece without establishing a physical presence, doubled, i.e. increased from 11 firms in 2022 to 22 at the end of 2023. Moreover, 2 EEA AIFMs provided investment services in Greece through a branch (by establishing a physical presence). As regards the distribution of AIFMs per country, the first place is still held by Luxembourg, followed by France, Cyprus and Ireland.

TABLE 34. Provision of Investment Services (MiFID) by EU AIMFs in Greece, 2021-2023

Country	Total EEA Firms		
	2023	2022	2021
France	4	2	4
Denmark	1	1	-
Ireland	3	2	4
Italy	1	-	-

Country	Total EEA Firms		
	2023	2022	2021
Cyprus	4	1	-
Luxembourg	7	5	5
Netherlands	2	-	-
Total	22	11	13

Source: HCMC

Moreover, during 2023, 1 AIFMC that have been authorised by the Hellenic Capital Market Commission provided cross-border investment services in EEA countries.

Provision of Investment Services set out in Directive 2014/65/EU (MiFID) by EEA Undertakings for Collective Investment in Transferable Securities (UCITS)

By the end of 2023, the number of EEA UCITS Managers providing investment services (MiFID) in Greece without establishing a physical presence, was marginally increased, i.e. from 47 firms in 2022 to 50 at the end of 2023.

As regards the distribution of Managers per country, France is ranked first, followed by Luxembourg.

TABLE 35. Provision of Investment Services (MiFID) in Greece by EEA UCITS Managers, 2021-2023

Country	Total EEA UCITS Managers		
	2023	2022	2021
Belgium	2	2	2
France	17	17	17
Germany	2	2	2
Ireland	6	3	3
Italy	2	2	2
Cyprus	2	2	2
Lichtenstein	1	1	1
Luxembourg	15	15	15
Norway	1	1	1

Country	Total EEA UCITS Managers		
	2023	2022	2021
Netherlands	1	1	1
Sweden	1	1	1
Total	50	47	47

Moreover, 1 EEA UCITS Manager provided investment services in Greece through a branch (by establishing a physical presence).

Marketing and pre-marketing of shares in EEA Alternative Investment Funds (AIFs) in Greece by EEA Alternative Investment Fund Managers (AIFMs) under Directive 2011/61/EU

At the end of 2023, the number of EEA AIFMs that marketed shares in EEA AIFs (including EuVECA and ELTIF) in Greece stood at 385, increased by approximately 24.5% year-on-year (see table 36). For most EEA countries (15 out of 21 countries) the numbers of AIFMs marketing AIFs in the Greek market increased year-on-year.

As regards the per-country distribution of EEA AIFMs that market AIFs in the Greek market, in 2023 the first place is still held by Luxembourg, which, with 17 new notifications, is present in the Greek market through 130 AIFMs, increased by 15% year-on-year (113 Managers in 2022).

This data includes pre-marketing notifications, namely the provision to the host country of information about the investment strategy or investment ideas of the investment fund to be marketed, with the purpose of exploring the possibility of marketing, an option that was introduced by Directive 2019/1160 and applies since August 2021.

TABLE 36. EEA AIFMs marketing (and pre-marketing) shares in EEA AIFs in Greece, 2021-2023

Country	Total EEA AIFMs		
	2023	2022	2021
Austria	11	10	5
Bulgaria	1	-	-
Belgium	3	3	3
France	45	39	30
Germany	46	32	20

Country	*Total EEA AIFMs*		
	2023	***2022***	***2021***
Denmark	*4*	*2*	*1*
Ireland	*40*	*31*	*21*
Italy	*4*	*3*	*3*
Croatia	*1*	*1*	*1*
Cyprus	*13*	*11*	*6*
Lithuania	*1*	*1*	*-*
Lichtenstein	*3*	*3*	*2*
Luxembourg	*130*	*113*	*90*
Malta	*8*	*7*	*7*
Norway	*4*	*3*	*3*
Netherlands	*21*	*15*	*12*
Portugal	*2*	*1*	*1*
Slovakia	*1*	*1*	*1*
Sweden	*41*	*32*	*1*
Czechia	*1*	*1*	*1*
Finland	*2*	*1*	*-*
Total	***385***	***310***	***229***

Source: HCMC

In 2023, as in 2022, the number of EEA AIFs marketed in Greece by EEA AIMFs was significantly increased year-on-year, i.e. by 46.48% (see Table 37), demonstrating the dynamic growth prospect of the AIF sector.

The per-country distribution of EEA AIFs marketed in Greece shows that Luxembourg is ranked first with 761 AIFs in 2023, as compared to 523 AIFs in 2022, an increase of 45.5%.

As regards pre-marketing notifications, in 2023 they more-than-doubled year-on-year, from 159 to 371.

TABLE 37. EEA AIFs marketed (marketing and pre-marketing) in Greece by EEA AIFMs, 2021-2023

Country	Total EEA AIFs		
	2023	2022	2021
Austria	20	17	11
Belgium	2		
Bulgaria	1		
France	75	43	27
Germany	69	41	25
Denmark	5	3	2
Ireland	294	205	132
Italy	4	3	3
Cyprus	8	9	7
Lichtenstein	10	5	2
Luxembourg	761	523	277
Malta	5	3	5
Norway	3	1	1
Netherlands	45	30	25
Portugal	2	1	1
Slovakia	1	1	1
Sweden	45	38	21
Finland	2	-	-
Total	**1352**	**923**	**542**

Source: HCMC

Finally, 2 EEA AIFMs and 2 EEA MFMF-AIFMs have been authorised by the Hellenic Capital Market Commission to market shares in 6 AIFs in EEA member states.

Marketing (and pre-marketing) of European Venture Capital Funds (EuVECAs) in Greece by EEA European Venture Capital Fund Managers (EuVECA Managers)

At the end of 2023, 153 European venture capital funds (EuVECAs) were marketed in Greece, as compared to 111 in 2022 (see table 38), which means that said activity increased approximately by 38% in the period 2020-23. Moreover, in the three-years 2021-2023 there has been an increase in the marketing of such funds from Germany and Sweden. It is noted that out of the total of these funds, 8 were pre-marketed, more specifically 4 European venture capital funds (EuVECAs) by Managers originating in Austria, 3 by Managers originating in Germany and 1 originating in Sweden.

TABLE 38. EuVECA marketed (marketing and pre-marketing) in Greece by EEA EuVECA Managers, 2021-2023

Country	Total EuVECAs		
	2023	2022	2021
Austria	20	16	9
Bulgaria	1	-	-
France	1	1	1
Germany	66	40	22
Ireland	4	4	4
Italy	2	2	2
Luxembourg	2	2	2
Netherlands	15	12	12
Portugal	2	1	1
Slovakia	1	1	1
Sweden	37	32	19
Finland	**2**	**-**	**-**
Total	**153**	**111**	**73**

Source: HCMC

Marketing (and pre-marketing) of European Long-Term Investment Funds (ELTIFs) in Greece

In 2023, there were 12 notifications for the marketing of European Long-Term Investment Funds (ELTIFs) in Greece, i.e. they were increased by 50% as compared to 8 notifications in 2022. The countries that provided notification for the marketing of such funds in Greece in 2023 were the same as in the previous year. Two funds for which notification was given by the Central Bank of Ireland were actually pre-marketed.

TABLE 39. ELTIFs marketed (marketing and pre-marketing) in Greece by EEA ELTIF Managers, 2021-2023

Country	Total ELTIFs		
	2023	2022	2021
France	1	2	2
Ireland	4	1	
Luxembourg	7	5	4
Total	**12**	**8**	**6**

Source: HCMC

Provision of services by Europeans crowdfunding service providers under Regulation 2020/1503 (ECSPR)

In 2023, 10 peer capital market regulators of the EU notified the Hellenic Capital Market Commission about the provision of crowdfunding services in Greece by a total of 23 firms.

TABLE 40. Provision of crowdfunding Services in Greece by EEA firms, 2021-2023

Country	Total EEA Firms		
	2023	2022	2022
Austria	1	-	-
France	3		
Estonia	1	-	-
Ireland	2	-	-
Spain	7	-	-
Cyprus	2	-	-

Country	Total EEA Firms		
	2023	2022	2022
Latvia	1	-	-
Netherlands	3	-	-
Poland	1		
Romania	2		
Total	23	-	-

ANNEX 1. of ANNEX 1 HCMC DECISIONS

No. Of Rule / Gazette	Title	Summary
3/981/16.3.2023 (Government Gazette B 2101/31.3.2023)	*Suspension of the redemption of UCITS shares on 7 and 10 April 2023*	*On the suspension of the redemption of shares across all UCITS categories on 7 April and 10 April 2023.*
4/982/30.3.2023 (Government Gazette B 2323/12.4.2023)	*Extension of the deadline set out in article 10 of HCMC Decision 1/506/8.4.2009 "Prevention of the use of the financial system for the purpose of money laundering and terrorist financing."*	*Concerns the extension of the deadline provided for in paragraph 2 of article 10 of HCMC Decision 1/506/8.4.2009 on the submission of the data of the 2022 Annual Report at the hyperlink "Annual Report Template in Excel format" of the thematic area "Money Laundering" of the HCMC website, until 28 April 2023.*
1/992/4.8.2023 (Government Gazette B 5024/9.8.2023)	*Approval of the amendment to the Rulebook of the Athens Exchange*	*Concerns the approval of amendments to the Rulebook of the Athens Stock Exchange, as decided at meeting No. 195/01.08.2023 of the Stock Markets Steering Committee.*
3/1000/31.10.2023 (Government Gazette B 6249/31.10.2023)	*Amendment to the Rulebook of the Hellenic Central Securities Depository*	*Concerns the amendment of the "Rulebook of the Hellenic Central Securities Depository" as stated in the Appendix to the application of the societe anonyme titled "Hellenic Central Securities Depository SA" dated (incoming protocol no. HCMC 11198/20.10.2023).*
16/1007/21.12.2023 (Government Gazette B 7769/31.12.2023)	*Registration of tied agents of Investment Firms, FIFs, MFMFs, and AIFMs with extended purpose.*	*Concerns the maintenance of a tied agents register by the Hellenic Capital Market Commission and its posting on the HCMC website.*

ANNEX 2. THE OPERATIONAL PLAN OF THE HCMC FOR 2024

*The **Operational Plan** of the HCMC for the year 2024 was approved by its Board of Directors by means of Decision 19/1007/21.12.2023 . It drafting is mandated by the provisions of article 4 of Law 4916/2022. The Annual Operational Plan is posted on the HCMC website and provides a roadmap for implementing the annual planning of the HCMC, mainly financed by the Recovery Fund, the NSRF, and own resources of the HCMC. The Operational Plan of the HCMC for 2024 reflects the key role of the Hellenic Capital Market Commission in ensuring the growth of the domestic capital market, taking into account the specific conditions prevailing in the external environment and the global economy. The Operational Plan elaborates on the Operating Pillars per Strategic Target (see 5-year Strategic Plan of the HCMC), which are further broken down into annual targets, actions and project per operating unit of the HCMC.*

Framework of the Greek Economy Recovery plan (Greece 2.0) - Capital Market Development

The National Recovery and Resilience Plan "Greece 2.0". "Greece 2.0" was approved by the Economic and Financial Affairs Council (Ecofin) on 13 July 2021. The NRRP includes 106 investments and 68 reforms, distributed along 4 pillars, and utilises resources of 31.16 billion euros, of which 30,5 billion euros are European funds (17.8 billion euros in grants and 12.7 billion euros in loans) to mobilise total investments of 60 billion euros in the country over the next five years.

This specific reform (Measure 16581 – "Enhanced capital market supervision and trustworthiness") belongs to Component 4.4 "Strengthen the financial sector and capital markets" of the NRRP. This component covers two general areas:

More specifically, the second area concerns the need to further develop Greek capital markets through their drastic digital modernisation. This will be achieved through the codification of the capital market framework and the revision of the relevant laws and regulations, as well as through the creation/renewal of its information systems.

Component 4.4 aims through integrated interventions to strengthen the capacity of the financial system to support the development of the economy, through the financing of companies and individuals in new ventures.

The object of the Project is the provision of specialised technical and operational advice to the Hellenic Capital Market Commission for the maturity, monitoring, management, realisation and completion of the Sub-projects of Measure "Capital Market Development", ID: 16581, which was included in the Recovery and Resilience Fund (RSF).

The Sub-projects of this NRRP Measure are the following:

***Sub-project 1:** Introduction of a Market Surveillance System,* *which will substantially improve the existing HCMC infrastructure, in terms of monitoring and auditing of transactions allowing the efficient operation of its audit and supervisory services.*

Sub-project 2: *Introduction of a data collection, processing, analysis and monitoring system,*

and the integration of all the data currently (and in the future) collected by HCMS staff will allow the multidimensional analysis, review and overview of current market conditions enabling fine tuning of procedures and interventions as needed to keep the capital markets healthy and expanding.

Sub-project 3: *Cybersecurity, cyber defense, cyber resilience (and disaster recovery),*

consists in the implementation of a system for dealing with all issues related to cyber defense and cyber resilience (CDR)

It should be noted that, as regards the HCMC, the above project was approved in 2022 and its implementation will begin in 2023, while it will be completed in 2025.

This OP incorporates and presents the most important objectives, projects and actions for the implementation of all the above.

2024 Operational Plan projects[3]

[3] Target weights are determined by: the contribution of the target to the work of the HCMC, its contribution to the realization of the Strategic Plan (direct and indirect), and the marking of the target by Management as being of special importance for the HCMC.

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
1. Contribution to the development of the capital market through the formation of the regulatory framework and its efficient implementation, the improvement of information and transparency in the market, and the simplification of procedures;		*(P1.A1.A2) Improvement - modernisation of the HCMC's internal procedures. In this context, the following examples are mentioned: a) implementation of strategic and operational targeting; b) continuous updating of the digital organization chart and the job outlines; c) drafting of legislative proposals to the Ministry of Finance and the Ministry of the Interior on hiring, transfer-secondment and in general. human resources management matters; and d) contribution in issues pertaining to the drafting and updating of the HCMC's organization chart.*	*Directorate of Administrative Services in collaboration with General Directorate*	*1*
		(P1.A1.A2) Following the drafting of the new Operating Regulation of the HCMC, and after its approval by the Ministry of Finance, its implementation by the Directorates of the HCMC should begin within 2024.		
		(P1.A1.A2) Drafting of the Internal Audit Department's Operating Regulation.	*Internal Audit Directorate with the assistance of the National Transparency Authority*	*2*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
		(P1.A1.A2) Drafting of the Code of Conduct.	*Internal Audit Directorate with the assistance of the National Transparency Authority*	*3*
		(P1.A1.A2) Internal Audit Manual and Quality Improvement Programme of the Internal Audit Directorate	*Internal Audit Directorate*	*3*
		(P1.A1.A2) Intensification of internal audits in HCMC Directorates	*Internal Audit Directorate*	*1*
		(P1.A2) Implementation of the digital transformation of the HCMC and improvement of its organization through new information systems and applications (Part of this will be implemented with financing from the Recovery Fund).	*All Directorates*	*1*
		(P1.A1.A2.A3.A4) Updating of circulars concerning the legislation on prospectuses.	*Directorate of Listed Companies*	*1*
		(P1.A1.A2.A3.A4) Cooperation of consultants and lawyers with the HCMC for the creation of a Prospectus template.	*Directorate of Listed Companies*	*3*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
		(P1.A1.A2.A3.A4) Issuance of Decisions/Circulars on risk management tools	Directorate of Capital Market Intermediaries	1
		(P1.A1.A2.A3) Consultation with market agents with the aim of 1) bringing together supervised entities as regards the interpretation of the provisions of the regulatory framework and in the implementation of the procedures provided for; 2) identifying any difficulties related to the existing framework and submission of proposals for improvements or, in general, identifying issues that could be dealt with in a different manner for the purposes of market development.	Directorate of Listed Companies/ Capital Market Intermediaries/ Supervision of Markets/ Research	1
		(P1.A1.A4) Further enhancing the HCMC's extroversion by utilising the capability to exchange know-how with counterpart supervisory authorities in all cases this is provided for by cooperation protocols, signing of additional bilateral cooperation protocols if deemed necessary, and consideration of signing cooperation protocols with domestic authorities, possibly through a change in the existing legislative framework.	Directorate of International Relations in collaboration with General Directorate	1
		(P1.A1.A4) Transposition into the National Framework of the new Directive on AIF and UCITS Managers (new AIFMD)	Directorate of Capital Market Intermediaries	1

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
	1. To analyse the regulatory framework in order to detect any need for changes as regards the very operation of the Hellenic Capital Market Commission, as well as the issues pertaining to the overall development of Greek capital market; *2. To remove existing obstacles to the development of the capital markets, in the context of its mandate;*	*(P1.A1.A4) Preparation for the transposition into the National Framework and the implementation of the DORA and MiCa regulatory framework*	*Directorate of Capital Market Intermediaries*	*1*
		(P1.A1.A4) Participation of the Directorate of Capital Market Intermediaries to the New legislative proposals - Retail Investment Strategy.	*Directorate of Capital Market Intermediaries*	*1*
		(P1.A1.A4) Planning and organisation of the monitoring of European legislation with the aim of ensuring that the HCMC has up-to-date information, which will be disseminated to all its Directorates at all stages of the development of the EU's legislative proposals (from consultation to transposition into national law). This exercise requires close cooperation with the competent department of the Ministry of Finance, the Permanent Representation of Greece to the EU or other involved bodies.	*Directorate of International Relations in cooperation with other competent Directorates, the Contractor of the project, and the Department of Information Systems*	*1*
		(P1.A1.A4) Organisation and holding of he IOSCO Conference	*Directorate of International Relations in collaboration with the Directorate of Financial Services and the General Directorate*	*1*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
	3. To analyse and amend regulatory requirements that may impose a disproportionate burden on supervised companies; 4. To implement the regulatory framework in a fast and efficient manner, as regards the objective of market development	(P1.A1.A4) Support to the organisation and holding of the HCMC conference as regards the management of financial and public contracts issues	Directorate of Financial Services, Directorate of Public Relations	1
		(P1.A1.A4.A5) Expansion of cooperation between the HCMC and other domestic authorities or educational institutions, for example through the conclusion of Cooperation Protocols.	Gen. Directorate, Directorate of Research and Directorate of International Relations	1
		. (P1.A1.A4.A5) Monitoring the participation of HCMC executives in working groups	Gen. Directorate, Directorate of International Relations	
		(P1.A1.A4.A6) Design of market monitoring tools also by means of Artificial Intelligence (AI) applications.	Department of Information Systems in collaboration with other Directorates	1
	5. To further contribute to the effort of enhancing capital market access for small and medium-sized enterprises, improving, at	(P1.A1.A4.A6) Strengthening HCMC's audit and supervisory role through training and the use of forensic tools.	Department of Information Systems in collaboration with other Directorates	2

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
	the same time, transparency conditions; 6. To support innovation and financial technology that will contribute to the simplification of procedures, as regards the extraction of data from the market and the submission of data and reports by supervised companies or investors, as well as the dissemination of information, and communication with, supervised companies; and 7. To promote financial capital market literacy, by:	*(P1.A1.A4.A7) Provision of the market and investors with timely information regarding the implementation of Greek and European legislation.*	*The Directorate responsible in each given case.*	*1*
		(P1.A1.A4.A7) Provision information about the CCP resolution legislation to supervised entities and investors	*Resolution Unit*	*1*
		(P1.A1.A4.A7) Provision of information about the Investment Firm resolution legislation to supervised entities and investors	*Resolution Unit*	*1*
		(P1.A1.A4.A7) Upgrading of the website of the Hellenic Capital Market Commission with emphasis on making it easier to use for the purposes of informing investors more effectively.	*Gen. Directorate in cooperation with the Directorate of Research and all Directorates*	*2*
	a) enhancing the presence of the HCMC, through the use of accessible and attractive forms of communication in regard to capital markets; and b) organising educational seminar/actions for various	*(P1.A1.A4.A7) Promotion of financial literacy as regards capital market issues through individual actions, in cooperation with educational institutions and other agencies.*	*Directorate of Research*	*1*
		(P1.A1.A4.A7) Updating of the informative material that is posted on the website of the HCMC for the purpose of promoting financial literacy as regards capital market issues.	*Directorate of Research*	*1*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
	groups, such as students, pupils, small businesses, investors.	(P1.A1.A4.A7) Preparation of an informative leaflet titled "DO NOT INVEST WITH YOUR EYES CLOSED" to be posted on the website of the HCMC for the purpose of promoting financial literacy as regards capital market issues.	Directorate of Research	1
		(P1.A3) Further development of an HCMC costing model on the basis of real data (e.g. recording of work hours through an application by directorates) and extraction of costing reports on the services provided by the HCMC in relation to resources also through a special application	Department of Financial Services in collaboration with other Directorates.	1
		(P1.A3) Establishment of procedures and training of public contract committee members	Directorate of Financial Services	2
		(P1.A3) Establishment of procedures and safeguards for bidding on public contracts through a special application (excluding cases using the ESIDIS system)	Directorate of Financial Services	2

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
		(P1.A3) Further enhancement of the procedures for monitoring HCMC's active public contracts through a special application (has been incorporated in the Growth Fund project) and establishment of procedures and safeguards for the timely submission of primary requests	*Persons responsible for monitoring contracts and Directorates in cooperation with the Directorate of Financial Services*	*2*
		(P1.A3) Establishment of Key Performance Indicators (KPIs) concerning key financial operations of the HCMC (e.g. payments, receipts of resources etc.) and periodic monitoring thereof	*Directorate of Financial Services*	*2*
		(P1.A3) Comparative analysis and study of the amounts charged by other Regulators and ESMA, with the aim of further reforming the HCMC's resources	*Directorate of Financial Services in collaboration with the Directorate of International Relations*	*1*
		(P1.A3) Development of systems for the timely announcement by the directorates of resources from supervised entities also through a special application	*Directorate of Financial Services in collaboration with Directorates.*	*2*
		(P1.A3) Establishment of procedures and development of systems for monitoring the collectibility of HCMC resources	*Directorate of Financial Services*	*1*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
		(S1.A1.A2.A3) Completion of procedures for the selection and/or hiring, transfer and secondment of employees	*Directorate of Administration Services*	
		(S1.A1.A2.A3) Continued participation as a host agency in university internship programmes	*Directorate of Administration Services*	
		(S1.A1.A2.A3) Full support of the new evaluation, target-setting, and bonus payment procedures set out in law 5043/2023	*Directorate of Administration Services*	
		(S1.A1.A2.A3) Fulfillment of all other responsibilities provided for by the organization chart or Board/EC decisions, e.g.: 1. Transmission of public prosecutor orders, decrees, requests for the provision of data by Tax Offices and other authorities to capital market intermediaries; 2. Formation of committees/service councils; 3. Promotions, scorecard, seniority, recognition of prior employment outside the public sector, forwarding of proposals on service matters etc.	*Directorate of Administration Services*	
		(S1.A3) Establishment of procedures for preparing and monitoring the execution of the Budget through the use of an application	*Directorate of Financial Services in collaboration with other Directorates.*	2

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
		(S1.A3) Stocktaking of all HCMC fixed assets and, in cooperation with the statutory auditors, corrective bookkeeping entries for fixed assets of limited residual value	*Directorate of Financial Services*	*1*
		(P1.A4) Promotion of staff training and retraining by increasing the hours of attendance to seminars or postgraduate/undergraduate courses.	*Directorate of Administration Services*	*1*
		Participation in seminars of ESMA and other agencies for the training of HCMC executives.	*Gen. Directorate and Directorate of Administration Services*	*1*
2. Use new technologies and establish new methods of supervision, emphasising on the prudential supervision of the market	*1. To constantly monitor the market, by enhancing the use of data (including big data) and systematically communicating with capital market participants, companies, professional associations, investors.* *2. To assess and prioritise*	*(P2.A1.A2.A3.A4.A8) Design and development of supervision applications, giving priority to Risk-based supervision, per supervised activity.*	*Supervisory Directorates*	*1*
		(P2.A1.A2.A3.A4.A8) Design and development of applications for carrying out audits (on-site or remote).	*Supervisory Directorates*	*3*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory	Priority level of implementation
	the risks emanating from innovative products, services and business models;	(P2.A1.A2.A3.A4.A8) Formation of the Resolution College pursuant to the CCP Regulation	Resolution Unit	1
		(P2.A1.A2.A3.A4.A8) Initiation of the preparation of the CCP Resolution Plan	Resolution Unit	1
	3. To assess the requirements of the HCMC's supervisory work and organise prudential supervision on the basis of risk prioritisation;	(P2.A1.A2.A3.A4.A7.A8) Enhancement of efficiency as regards the authorization, supervision, recovery and resolution of central counterparties	General Directorate/ Directorate of Capital Market Intermediaries/ Resolution Unit	
		(P2.A1.A2.A3.A4.A5.A8) Implementation of an application for the submission of investment company information, its processing by the competent executives of the HCMC and their subsequent dispatch to the competent agencies.	Directorate of Capital Market Intermediaries /Listed Companies	1
		(P2.A1.A2.A3.A4.A5.A8) Implementation of the new IT programme for the evaluation of supervised companies as regards the risk of Money Laundering, and supervision through this programme.	Special Unit for the Prevention of Money Laundering	1

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
	4. To enhance the supervision of algorithmic transaction practices, by preventing behaviours/practices that may endanger the cohesion and stability of the market; *5. To assess the results of prudential supervision;*	*(P2.A1.A2.A3.A4.A5.A8) Completion of the National Risk assessment (NRA) on Money Laundering, based on the World Bank's tool, in regard to the industry risk of the financial sector of the capital market and provision of input to all working groups.*	*Special Unit for the Prevention of Money Laundering*	*2*
		(P2.A1.A2.A3.A4.A5.A6.A9) Promotion of staff training on: a) the new legislative texts concerning European legislation and the new AMLA supervisory authority and b) enhancing audit and supervisory work on crypto-providers.	*Special Unit for the Prevention of Money Laundering*	*1*
		(P2.A1.A2.A3.A5.A6.A9) Promotion of staff training and retraining by increasing the hours of attendance to seminars or postgraduate/undergraduate courses.	*Directorate of Administration Services*	*1*
		(P2.A1.A2.A3.A4.A7.A8) Reconstruction-upgrading of the HCMC's website portal.	*Gen. Directorate and Directorate of Administration Services*	*2*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
	6. To improve the education of HCMC personnel on issues of prudential supervision, data use and processing, risk assessment and prioritisation, and to secure the resources required (specialized personnel, risk analysis, organisation, technical resources) for exercising effective prudential supervision;	*(P2.A1.A2.A3.A4.A7.A8) Implementation of a project for the online and remote conduct of certification examinations.*	*Directorate of Research*	*1*
		(P2.A1.A2.A3.A4.A7.A8) Launching of the application for the management-processing of applications for certification of suitability of executives who provide investment services through an HCMC portal using authentication credentials provided through the GSIS platform (TAXISNET).	*Directorate of Research (the application has been implemented, has not yet been launched)*	*1*
	7. To assess the HCMC's internal operation requirements in order to ensure the efficient deployment of innovative technologies;	*(P2.A1.A2.A3.A4.A7.A8) Launching of the application for the management-processing of submitted statistical data on Mutual Funds charges and retail investor-related data for research purposes through an HCMC portal using authentication credentials provided through the GSIS platform (TAXISNET).*	*Directorate of Research (the application has been implemented, has not yet been launched)*	*1*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
	8. To acquire and use the appropriate information systems and applications for enhancing supervision (supervisory technology, SupTech) and optimising internal procedures. *9. To improve the education of HCMC executives on issues of innovative (financial) technology and secure the resources required (specialized personnel, risk analysis, organisation, technical resources) for its effective use.*	*(P2.A1.A2.A3.A4.A7.A8) Implementation of the HCMC's new portal for the submission of requests by citizens and companies using authentication credentials provided through the GSIS platform (TAXISNET),*	*Directorate of Administration Services*	*1*
		(P2.A1.A2.A3.A4.A7.A8) Implementation of a new application regarding the lists of supervised persons (art. 19 of Regulation 596).	*Directorate of Markets Supervision*	*1*
		(P2.A1.A2.A3.A4.A7.A8) Further improvement of the Directorate's organization through new IT applications, the procurement, installation, calibration, and adaptation of which to the needs of the directorate have already been realised in 2023, in particular: A) the new single application for the control of staff attendance and the approval-registration of leaves of absence and B) the new application for the management of hiring authorisations pursuant to law 5043/2023	*Directorate of Administration Services*	*1*
		(P2.A1.A2.A3.A4.A7.A8) Processing of correspondence through an IT system (HCMC portal) for the submission of requests by citizens and supervised persons/entities with authentication via TAXISNET code and Hellenic Post prepayment device	*Directorate of Administration Services*	
		(P2.A1.A2.A3.A4.A7.A8) Upgrading of the digital infrastructure of the HCMC.	*Gen. Directorate / Directorate of Administration Services in cooperation with*	*1*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory	Priority level of implementation
			other Directorates	
		(P2.A1.A2.A3.A4.A7.A8) Design of an application for the supervision of investment management	*Directorate of Capital Market Intermediaries*	*1*
		(P2.A1.A2.A3.A4.A7.A8) Upgrading of the REGISTER application in order to be used also by the licensing departments of the Directorate of Capital Market Intermediaries	*Directorate of Capital Market Intermediaries*	*1*
		·(P2.A1.A2.A3.A4.A7.A8) Upgrading the system for the registration and monitoring of information regarding the cross-border activity of supervised capital market entities (incoming and outgoing passports) and control of the completeness and quality of recorded information.	*Directorate of International Relations in cooperation with the Contractor of the digitisation project, and the Department of Information Systems*	*1*
		·(P2.A1.A2.A3.A4.A7.A8) Processing of correspondence on requests for the provision of assistance both with EU and third country supervisory authorities through a secure IT system (as part of upgrading the digital infrastructure of the HCMC)	*Directorate of International Relations in cooperation with the Contractor of the digitisation project, and the Department of Information*	*2*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
			Systems	
		(P2.A1.A8) Implementation of an application for the management of data and published information of listed companies & supervised persons (natural or legal), pursuant to law 3461/2006, law 3556/2007, law 4706/2020, Regulation 596/ 2014 & of law 4443/2016.	Directorate of Listed Companies	1
		(P2.A1.A8) Implementation of an application for the receipt and processing of listed company financial statement information in iXBRL format.	Directorate of Listed Companies	1
		(P2.A1.A8) Design and development of applications in relation to the more efficient management of databases that include supervised person data.	Directorate of Listed Companies	2
		(P2.A1.A2.A3.A4.A7.A8) Identification of potential market abuse cases with the use of Artificial Intelligence models	General Directorate / Directorate of Markets Supervision, Department of Information	2

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
			Systems	
3. Continue to give priority to investor protection;	*1. To use the full range of HCMC's policy, supervision, regulatory compliance and enforcement tools, in order to deal, effectively and consistently, with the causes of illegal practices;*	*(P3.A1.A2.A3.A4.A5.A6.A7) Further systematization of preventive audits and search for automation tools (see above).*	*Supervisory Directorates*	*1*
		(P3.A1.A2.A3.A4.A5.A6.A7.A8) Expediting the processing of pending cases also through the use of applications.	*All Directorates*	*1*
		(P3.A1.A2.A3.A4.A5.A6.A7.A8.A9) Further systematization of the investigation and completion of cases of investor fraud and posting of the relevant warnings to investors, given the increasing number of cases of fraud by unauthorised companies and persons-representatives of online platforms.	*Directorate of Markets Supervision*	*1*
	2. To act swiftly in order to protect as many investors as possible, prevent material losses, if possible before they are incurred by investors and other market	*(P3.A1.A2.A3.A4.A5.A6.A7) Design and development of IT applications for risk-based supervision (see above).*	*Supervisory Directorates*	*1*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory	Priority level of implementation
	participants; 3. To intensify preemptive audits, develop applications for risk-based supervision, and take initiatives for providing the market and investors with timely information on the implementation of European and national legislation; 4. To monitor the financial resilience of supervised companies, so that they comply with important regulations concerning the protection of their clients' money and assets, and are able to recover fast from potential interruptions of their operation;	(P3.A1.A2.A3.A4.A5.A6.A7) Market research and development of applications for the conduct of audits and the faster investigation of market abuse cases (see above).	Directorate of Markets Supervision / Listed Companies	1
		(P3.A1.A2.A3.A4.A5.A6.A7) Emphasis on the quality of the data submitted by supervised entities and persons.	All supervisory Directorates	1
	5. To help suppress financial crime in the capital market, including fraud, money laundering, and market abuse; 6. To prevent market abuse	(P3.A1.A2.A3.A4.A5.A6.A7.A8.A9) Monitoring and dealing with risks associated with digital assets.	Special Unit for the Prevention of Money Laundering	1

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
	cases by ensuring that supervised companies and securities issuers properly protect confidential information, while securities issuers make timely and accurate disclosures, in order to support market transparency;	*(P3.A1.A2.A3.A4.A5.A6.A7.A8) Implementation of the HCMC's new IT system for the assessment of supervised companies as regards the risk of money laundering. Its purpose is to ensure timely risk assessment through the use of more reliable data so that the applicable legislation and the relevant EBA guidelines on risk-based supervision can be applied more effectively and consistently.*	*Special Unit for the Prevention of Money Laundering*	*1*
	7. To monitor and prevent cases of companies authorised by the HCMC, which may market unsuitable financial Instruments and services to investors, especially in an environment where digital services make investor participation faster and easier than ever;	*(P3.A1.A2.A3.A4.A5.A6.A7.A9) Monitoring and effective handling of risks related to misleading investors through greenwashing.*	*Directorate of Capital Market Intermediaries /Listed Companies*	*1*
	8. To prevent the provision of investment services by companies, individuals and platforms that are not authorised by the HCMC, and to issue	*(P3.A1.A2.A3.A4.A5.A6.A7) Communication with market agents concerning the quality of the submission of suspicious transaction and order reports (STORs), or the non-receipt thereof, and evaluation of the results.*	*Directorate of Markets Supervision*	*1*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
	warnings to investors concerning these companies and their practices; 9. To enhance financial literacy on capital market issues, by: a) providing standardized, clear, and accurate information about the costs, risks, and returns of investment tools (a case in point being the Key Investor Documents);	*(P3.A1.A2.A3.A4.A5.A6.A7) Compliance evaluations on market participants in relation to initiatives/recommendations on subjects such as the list of persons discharging managerial responsibilities (PDMR list), PDMR transactions notifications and the proper keeping and preparation of insider lists.*	*Directorate of Markets Supervision*	*1*
		(P3.A1.A2.A3.A4.A5.A6.A7) Replacement of e-protocol applications (PDMR list) and Short Selling Platform (see above).	*Directorate of Markets Supervision*	*2*
	b) enhancing the presence of the HCMC in the social media, through the use of accessible and attractive forms of communication with investors as regards risks and capital markets; and c) organising training seminars/activities for investors.	*(P3.A1.A2.A3.A4.A5.A6.A7) Follow-up of the issues agreed at the European level and documented by ESMA's Senior Supervisors Forum (SSF) regarding risks (2022 Supervisory Convergence Heatmap) and enhancement of supervisory convergence.*	*All Supervisory Directorates*	*1*
		(P3.A1.A2.A3.A4.A5.A6.A7) Automation of the submission of daily short positions (see above)	*Directorate of Markets Supervision (see above)*	*2*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
		(P3.A1.A2.A3.A4.A5.A6.A7) Assumption of legislative initiatives as a result of the application of the Listing Act of the European Commission.	*Directorate of Research in cooperation with Supervisory Directorates and the Legal Service*	*3*
4. Sustainability and establishment of the mode of supervision of the relevant issues	*1. To organise the supervision of sustainable finance-related issues, as regards supervised entities that are subject to the new European sustainable finance regulations (market participants, non-financial information, green bonds etc.) which are in force or in the formative stage;*	*(P4.A1) Actions on the part of ATHEX listed companies: continuous supervision of disclosures in the Annual Financial Statements / Issuance of Q&As 439/22.02.2022 regarding the implementation of Article 8 of Regulation 2020/852 and other required actions based on the institutional framework.*	*Directorate of Listed Companies*	*1*
	2. To continue HCMC initiatives for providing information to, and raising the awareness of, the market, as well as to enhance the training of HCMC executives on sustainable finance-related subjects, in order to facilitate the incorporation of the new institutional framework, and to secure	*(P4.A1.A2.A3) Market mapping, issuance of relevant clarification circulars, and internal procedures.*	*Directorate of Listed Companies*	*2*
		(P4.A1.A2.A3) Participation of HCMC staff members in targeted seminars by European and international bodies on Sustainable Financing issues.	*Directorate of Listed Companies and Capital Market Intermediaries*	*1*

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
	the necessary resources (specialised personnel, risk analysis, technical resources) for a seamless transition to sustainable economy.			
	3. To participate in consultations at the national, European and international levels for the optimal adoption of EFG factors in capital market practice and supervision. To determine whether it is necessary to issue guidelines for the implementation of the new framework, especially in line with the corresponding actions of ESMA and the EC.	(P4.A1.A2.A3) Ensuring that the HCMC is provided with legal and technical support by experienced staff specialised in Sustainable Financing issues.	Directorate of Capital Market Intermediaries /Listed Companies	1
		(P4.A1.A3) Gradual implementation and supervision of ESG legislation as regards capital market entities that are subject to the said institutional framework.	Directorate of Capital Market Intermediaries /Listed Companies	1
		(P4.A2.A3) Promotion of staff training and retraining by increasing the hours of attendance to seminars or postgraduate/undergraduate courses.	Directorate of Administration Services	1
		(P4.A3) Participation in the consultations on the EU legislation under formation on ESG issues (CSRD, Green Bond Standard, newer ESG regulations) and on the issues addressed by ESMA/OECD and other bodies.	Directorate of Listed Companies/ Capital Market Intermediaries/ Research/ International	1

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory Directorate	Priority level of implementation
			relations	
		(P4.A3) Continuous monitoring of European legislation currently under development on ESG issues, as well as of the corresponding developments, and strengthening of supervisory convergence.	Directorate of Listed Companies/ Capital Market Intermediaries/ Research/ International relations	1
		(P4.A3) Assistance to the formation of domestic policy on sustainable finance issues.	Directorate of Listed Companies/ Capital Market Intermediaries/ Research	1
		(P4.A1.A3) ESG risk management framework for the financial sector - Enhancement of the regulatory and supervisory capabilities of the Hellenic Capital Market Commission	General Directorate/ Directorate of Listed Companies/ Directorate of Capital Market Intermediaries	1

STRATEGIC TARGETS	COMMITMENTS	PROJECTS-ACTIONS FOR 2024	Supervisory	Priority level of implementation
5. Innovation and Digital Transformation	*1. To develop a strategy concerning the optimum utilisation of innovative technology.*	*(P5.A1.A2.A3.A4.A5) Development of channels of communication with organisations that promote research and the dissemination of information on innovative financial technology.*	*Directorate of Research*	*1*
	2. To improve cyber-security standards, establish best practices, and enhance supervision. *3. To promote initiatives related to artificial intelligence (AI) and decentralised finance, DLT and blockchain.* *4. To enhance the HCMC Innovation Hub, as a point of contact and evaluation of innovative projects in the capital market, as well as collaboration with interested parties.* *5. To enhance cooperation with organisations that promote research and the dissemination of information on innovative financial technology.*	*(P5.A1.A4.A5) Promotion of staff training and retraining by increasing the hours of attendance to seminars or postgraduate/undergraduate courses on new EU legislation on digital finance.*	*Department of Administration Services in collaboration with other Directorates.*	*2*
		(P5.A1.A4.A5) Enhancement of the operation of the Innovation Hub through cooperation with other agents.	*Innovation Hub Team*	*2*
		[P5.A3.A4.A5] Exploration of solutions and applications for the further use of Artificial Intelligence (AI) in the HCMC supervisory operations.	*Innovation Hub Team, Department of Information Systems and other Directorates*	*2*
		[P5.A3.A4.A5] Further exploration of issues pertaining to decentralised finance, DLT and blockchain, and their impact on the capital market.	*Directorate of Research*	*3*

ANNEX 3. HCMC PARTICIPATION IN, AND CONTRIBUTION TO, INTERNATIONAL CONFERENCES AND MEETINGS

- *24 to 26 January 2023, Florence, Participation in a training programme of the EU Digital Supervisory Finance Academy;*
- *25 January 2023, Teleconference of ESMA's Post-Trading Standing Committee;*
- *25 to 27 January 2023, Paris, Meeting of the Management Board and the Board of Supervisors of ESMA;*
- *26 to 27 January 2023, Frankfurt, Meeting of the sub-committee of the Joint Committee of the European Supervisory Authorities (ESAs) on digital operational resilience (DORA);*
- *28 January 2023, Teleconference of the sub-committee on investor protection and financial innovation of the Joint Committee of the European Supervisory Authorities (ESAs);*
- *2 February 2023, Teleconference of ESMA's Working Group on Market Integrity;*
- *2 to 3 February 2023, Teleconference of the working group on financial reporting of ESMA's Issuers Standing Committee;*
- *7 February 2023, Teleconference of ESMA's Digital Finance Standing Committee;*
- *9 February 2023, Participation via teleconference in an ESMA seminar on MiCA issues;*
- *13 February 2023, Teleconference of ESMA's Investment Management Standing Committee;*
- *14 February 2023, Teleconference of ESMA's Risk Standing Committee;*
- *14 February 2023, Teleconference of ESMA's Markets Standing Committee;*
- *16 February 2023, Teleconference of the European Forum for Innovation Facilitators;*
- *17 February 2023, Teleconference of ESMA's Proportionality and Coordination Committee;*
- *27 to 28 February 2023, Paris, Meeting of ESMA's Investor Protection Standing Committee;*
- *28 February to 2 March 2023, Brussels, Meeting of the Council working group on the markets in crypto-assets regulation (MiCA);*
- *2 March 2023, Teleconference of the sub-committee on investor protection and financial innovation of the Joint Committee of the European Supervisory Authorities (ESAs);*
- *6 to 7 March 2023, Paris, Meeting of ESMA's Digital Finance Standing Committee;*
- *7 March 2023, Teleconference of a Working Group of ESMA's Investment Management Standing Committee;*
- *7 March 2023, Paris, Meeting of the EBA Standing Committee on money laundering and terrorist financing;*
- *12 to 17 March 2023, Florence, Participation in a training programme of the EU Digital Supervisory Finance Academy on Artificial Intelligence and Machine Learning for Sub Tech;*
- *13 March 2023, Teleconference of ESMA's Proportionality and Coordination Committee;*
- *13 March 2023, Paris, Meeting of the Joint Committee (JC) of the European Supervisory Authorities' (ESAs);*
- *14 March 2023, Teleconference of ESMA's Post-Trading Working Group;*
- *14 to 15 March 2023, Paris, Meeting of the OECD Corporate Governance Committee;*
- *16 March 2023, Paris, Meeting of the ESMA Enforcement network;*
- *16 March 2023, Teleconference of the Board of Supervisors of ESMA;*

- *19 to 22 March 2023, Paris, Teleconference of the OECD Task Force on Financial Consumer Protection;*
- *20 March 2023, Brussels, Meeting of a Council working group on the proposal for directive on multiple-vote share structures for companies seeking admission to trading of their shares on an SME growth market;*
- *22 to 23 March 2023, Teleconference of the Management Board as well as the Board of Supervisors of ESMA;*
- *28 to 29 March 2023, Teleconference of the working group on financial reporting of ESMA's Issuers Standing Committee;*
- *28 to 30 March 2023, Bahamas, Meetings of the IOSCO Screening Group and the IOSCO Policy Committee 4;*
- *30 March 2023, Teleconference of ESMA's Working Group on Market Integrity;*
- *3 April 2023, Participation via teleconference in an ESMA seminar on crypto-asset and market abuse issues;*
- *4 to 5 April 2023, Teleconference of ESMA's Investment Management Standing Committee;*
- *5 April 2023, Teleconference of ESMA's Secondary Markets Working Group;*
- *14 April 2023, Teleconference of ESMA's ESAP Task Force;*
- *18 April 2023, Frankfurt, Meeting of the sub-committee of the of the Joint Committee of the European Supervisory Authorities (ESAs) on digital operational resilience (DORA);*
- *19 April 2023, Teleconference of a Working Group of ESMA's Investment Management Standing Committee;*
- *19 to 20 April 2023, Paris, Meeting of ESMA's Markets Standing Committee;*
- *19 to 20 April 2023, Paris, Meeting of ESMA's Investor Protection Standing Committee;*
- *20 April 2023, Teleconference of ESMA's Risk Standing Committee;*
- *20 April 2023, Paris, Meeting of the ESMA Management Board;*
- *20 to 24 April 2023, Paris, Meeting of the FATF Assessment Team for the mutual evaluation of Qatar;*
- *21 April 2023, Paris, Meeting of ESMA's Sustainability Standing Committee;*
- *24 April to 14 May 2023, Florence, Participation in a training programme of the EU Digital Supervisory Finance Academy;*
- *26 to 28 April 2023, Stockholm, Participation at a Eurofi High Level Seminar;*
- *27 April 2023, Teleconference of ESMA's Working Group on Market Integrity;*
- *3 May 2023, Teleconference of the EBA's Resolution Standing Committee;*
- *3 May 2023, Teleconference of ESMA's Secondary Markets Working Group;*
- *4 May 2023, Teleconference of ESMA's Digital Finance Standing Committee;*
- *7 to 15 May 2023, Florence, Participation in a training programme of the EU Digital Supervisory Finance Academy on Artificial Intelligence and Machine Learning for Sub Tech;*
- *12 May 2023, Teleconference of the sub-committee on investor protection and financial innovation of the Joint Committee of the European Supervisory Authorities (ESAs);*
- *15 May 2023, Teleconference of ESMA's Post-Trading Working Group;*
- *16 to 17 May 2023, Paris, Meeting of the sub-committee of the of the Joint Committee of the European Supervisory Authorities (ESAs) on digital operational resilience (DORA);*
- *16 to 17 May 2023, Stockholm, Meeting of the Management Board and the Board of Supervisors of ESMA;*

- *17 May 2023, Meeting of the Working Group on shareholder rights of ESMA’s Issuers Standing Committee;*
- *22 May 2023, Teleconference of ESMA’s Senior Supervisors Forum on investment management;*
- *23 May 2023, Teleconference of the European Forum for Innovation Facilitators;*
- *23 to 24 May 2023, Teleconference of the working group on financial reporting of ESMA’s Issuers Standing Committee;*
- *24 May 2023, Teleconference of ESMA’s ESAP Task Force;*
- *25 May 2023, Teleconference of ESMA’s Secondary Markets Working Group;*
- *25 May 2023, Teleconference of ESMA's Working Group on Market Integrity;*
- *25 May 2023, Teleconference of the working group on financial stability and risk monitoring of ESMA’s Risk Standing Committee;*
- *26 May 2023, Teleconference of the working group on trends and investor research of ESMA’s Risk Standing Committee;*
- *31 May 2023, Teleconference of ESMA’s Senior Supervisors Forum on markets;*
- *1 June 2023, Teleconference of ESMA’s Investment Management Standing Committee;*
- *1 to 2 June 2023, Paris, Meeting of ESMA’s Issuers Standing Committee;*
- *5 to 6 June 2023, Paris, Meeting of ESMA’s Digital Finance Standing Committee;*
- *12 June 2023, Teleconference of ESMA's Working Group on Market Integrity;*
- *13 June 2023, Teleconference of a Working Group of ESMA’s Investment Management Standing Committee;*
- *13 June 2023, Teleconference of the EBA’s Resolution Standing Committee;*
- *13 to 16 June 2023, Florence, Participation in a training programme of the EU Digital Supervisory Finance Academy on DLT in the Financial Sector;*
- *13 to 16 June 2023, Thailand, IOSCO Annual Conference;*
- *14 June 2023, Brussels, Meeting of the EBA Standing Committee on money laundering and terrorist financing;*
- *15 June 2023, Teleconference of the ESMA Enforcement network;*
- *17 June 2023, Teleconference of ESMA’s Markets Standing Committee;*
- *20 June 2023, Teleconference of ESMA’s Post-Trading Working Group;*
- *20 June 2023, Teleconference of the Management Board of ESMA;*
- *20 June 2023, Teleconference of ESMA’s ESAP Task Force;*
- *22 June 2023, Teleconference of ESMA’s Risk Standing Committee;*
- *22 June 2023, Teleconference of ESMA’s Proportionality and Coordination Committee;*
- *23 to 24 June 2023, Vienna, Meeting of the European Passports Experts Network;*
- *28 to 30 June 2023, Warsaw, Meetings of the IOSCO Screening Group and the IOSCO Policy Committee 4;*
- *3 July 2023, Meeting of the Working Group on shareholder rights of ESMA’s Issuers Standing Committee;*
- *4 to 5 July 2023, Teleconferences of the Management Board and the Board of Supervisors of ESMA;*
- *6 July 2023, Meeting of the Working Group on shareholder rights of ESMA’s Issuers Standing Committee;*

- *6 July 2023, Teleconference of ESMA's Working Group on Market Integrity;*
- *6 July 2023, Rome, Meeting of the EBA's Resolution Standing Committee;*
- *7 July 2023, Teleconference of ESMA's Investment Management Standing Committee;*
- *12 July 2023, Teleconference of ESMA's ESAP Task Force;*
- *13 July 2023, Participation via teleconference in an ESMA seminar on Carbon Markets;*
- *13 July 2023, Teleconference of the sub-committee on investor protection and financial innovation of the Joint Committee of the European Supervisory Authorities (ESAs);*
- *18 July 2023, Teleconference of ESMA's Markets Standing Committee;*
- *31 August 2023, Teleconference of ESMA's Secondary Markets Working Group;*
- *31 August 2023, Teleconference of ESMA's Working Group on Market Integrity;*
- *31 August 2023, Teleconference of ESMA's ESAP Task Force;*
- *1 September 2023, Meeting of the Working Group on shareholder rights of ESMA's Issuers Standing Committee;*
- *7 September 2023, Meeting of the Working Group on shareholder rights of ESMA's Issuers Standing Committee;*
- *5 to 6 September 2023, Teleconference of the working group on financial reporting of ESMA's Issuers Standing Committee;*
- *7 to 8 September 2023, Milan, Meeting of ESMA's Digital Finance Standing Committee;*
- *11 September 2023, Teleconference of the working group on financial stability and risk monitoring of ESMA's Risk Standing Committee;*
- *12 September 2023, Teleconference of the working group on trends and investor research of ESMA's Risk Standing Committee;*
- *13 September 2023, Teleconference Task Force of the OECD Corporate Governance Committee;*
- *14 September 2023, Teleconference of ESMA's Risk Standing Committee;*
- *15 September 2023, Teleconference of the sub-committee on investor protection and financial innovation of the Joint Committee of the European Supervisory Authorities (ESAs);*
- *19 September 2023, Paris, Meeting of the working group on prospectuses of ESMA's Issuers Standing Committee;*
- *19 September 2023, Teleconference of ESMA's Markets Standing Committee;*
- *19 to 20 September 2023, Lyons, Meeting of the FATF/INTERPOL Task Force;*
- *20 to 22 September 2023, Venice, Participation in the "Kick off meeting of the technical support project on ESG risk management" and the "Conference on Social, Sovereign Geopolitical Risks";*
- *21 September 2023, Teleconference of the European Forum for Innovation Facilitators;*
- *26 September 2023, Teleconference of a Working Group of ESMA's Investment Management Standing Committee;*
- *26 Settlement 2023, Participation via teleconference in an ESMA seminar on Settlement Efficiency;*
- *26 to 28 September 2023, Madrid, Participation in the 25th IOSCO seminar on "the use of supervision, international enforcement co-operation and credible deterrence by securities regulators to protect investors";*
- *28 September 2023, Paris, Meeting of the ESMA Enforcement network;*
- *28 September 2023, Dublin, Meeting of the sub-committee of the of the Joint Committee of the European Supervisory Authorities (ESAs) on digital operational resilience (DORA);*

- *3 to 4 October 2023, Seville, Meetings of the Management Board and the Board of Supervisors of ESMA;*
- *9 to 10 October 2023, Teleconference of the Working Group on shareholder rights of ESMA's Issuers Standing Committee;*
- *10 October 2023, Teleconference of ESMA's Post-Trading Working Group;*
- *10 October 2023, Paris, Meeting of the EBA Standing Committee on money laundering and terrorist financing;*
- *10 to 12 October, Madrid, Participation in an IOSCO seminar on "securities trading issues and market infrastructure";*
- *11 October 2023, Teleconference of ESMA's ESAP Task Force;*
- *11 to 12 October 2023, Teleconference of ESMA's Investment Management Standing Committee;*
- *12 to 13 October 2023, Meeting of the OECD Task Force on Financial Consumer Protection;*
- *16 October 2023, Teleconference of the working group on trends and investor research of ESMA's Risk Standing Committee;*
- *17 October 2023, Teleconference of the working group on financial stability and risk monitoring of ESMA's Risk Standing Committee;*
- *17 to 18 October 2023, Teleconference of the working group on financial reporting of ESMA's Issuers Standing Committee;*
- *18 October 2023, Participation via teleconference in an ESMA seminar on MiCA solutions;*
- *19 October 2023, Teleconference of ESMA's Senior Supervisors Forum on markets;*
- *19 October 2023, Teleconference of ESMA's Proportionality and Coordination Committee;*
- *24 October 2023, Paris, Meeting of the working group on financial reporting of ESMA's Issuers Standing Committee;*
- *25 to 26 October 2023, Paris, Meeting of the ESMA Working Group on market integrity;*
- *26 October 2023, Madrid, Meeting of the IOSCO Board;*
- *30 October 2023, Meeting of the Working Group on shareholder rights of ESMA's Issuers Standing Committee;*
- *31 October 2023, Teleconference of ESMA's Investment Management Standing Committee;*
- *6 November 2023, Teleconference of ESMA's Post-Trading Working Group;*
- *6 November 2023, Teleconference of ESMA's Digital Finance Standing Committee;*
- *6 to 27 November 2023, Participation via teleconference in a training programme of the EU Digital Supervisory Finance Academy on Global Regulation and Co-operation: Insights in Digital Finance,*
- *7 to 9 November 2023, New York, Meetings of the IOSCO Screening Group and the IOSCO Policy Committee 4;*
- *8 November 2023, Teleconference of ESMA's Secondary Markets Working Group;*
- *13 November 2023, Paris, Meeting of ESMA's Sustainability Standing Committee;*
- *13 to 14 November 2023, Paris, Meeting of the OECD Corporate Governance Committee;*
- *14 November 2023, Participation via teleconference in an ESMA seminar on Liquidity and Valuation Issues;*
- *15 November 2023, Paris, Meeting of the sub-committee on investor protection and financial innovation of the Joint Committee of the European Supervisory Authorities (ESAs);*
- *15 November 2023, Paris, Meeting of ESMA's Markets Standing Committee;*

- *16 November 2023, Paris, Meeting of the sub-committee of the of the Joint Committee of the European Supervisory Authorities (ESAs) on digital operational resilience (DORA);*
- *21 November 2023, Paris, Meeting of ESMA's CCP Policy Standing Committee;*
- *21 to 22 November 2023, Paris, Meeting of the EBA's Resolution Standing Committee;*
- *22 November 2023, Participation via teleconference in a debate of the European Blockchain Sandbox;*
- *22 November 2023, Paris, Meeting of the EBA's Resolution Standing Committee;*
- *23 November 2023, Teleconference of a Working Group of ESMA's Investment Management Standing Committee;*
- *23 to 24 November 2023, Teleconference of ESMA's Risk Standing Committee;*
- *26 to 28 November 2023, London, Participation in a conference titled "Morgan Stanley and Athens Stock Exchange Greek Investment Conference";*
- *28 November 2023, Participation via teleconference in an ESMA seminar on generative artificial intelligence in the securities markets;*
- *29 November 2023, Paris, Meeting of the Working Group on shareholder rights of ESMA's Issuers Standing Committee;*
- *29 November 2023, Participation via teleconference in an ESMA seminar on investment management;*
- *29 to 30 November, 2023, Basel, Participation in a conference on "financial inclusion 2023";*
- *30 November 2023, Teleconference of the European Forum for Innovation Facilitators;*
- *4 December 2023, Meeting of ESMA's Working Group on shareholder rights concerning secondary markets;*
- *4 December 2023, Participation via teleconference in an ESMA seminar on shortening the settlement cycle;*
- *4 December 2023, Meeting of the Working Group of ESMA's Issuers Standing Committee;*
- *4 December 2023, Teleconference of ESMA's Senior Supervisors Forum on enforcement;*
- *4 to 6 December 2023, Florence, Participation in a training programme of the EU Digital Supervisory Finance Academy;*
- *5 December 2023, Teleconference of ESMA's Senior Supervisors Forum on investment services;*
- *5 to 6 December 2023, Participation via teleconference in an ESMA seminar on Impact Investing;*
- *5 to 6 December 2023, Teleconference of the working group on financial reporting of ESMA's Issuers Standing Committee;*
- *7 December 2023, Teleconference of ESMA's Working Group on Market Integrity;*
- *11 December 2023, Teleconference of the working group on trends and investor research of ESMA's Risk Standing Committee;*
- *11 December 2023, Teleconference of ESMA's Senior Supervisors Forum on investment management;*
- *11 December 2023, Participation via teleconference in a debate of the European Blockchain Sandbox;*
- *11 to 12 December 2023, New York, Participation in the 25th Annual Capital Link invest in Greece Forum and the Greek American Issuer Day;*
- *12 December 2023, Teleconference of the working group on financial stability and risk monitoring of ESMA's Risk Standing Committee;*
- *12 to 13 December 2023, Teleconferences of the Management Board and the Board of Supervisors of ESMA;*

- *13 to 15 December 2023, Warsaw, Participation in a conference of KNF, the Polish regulator, on "training initiative on financial supervision on ESG – on going issues";*
- *15 December 2023, Teleconference of the ESMA Enforcement network;*
- *14 December 2023, Teleconference of ESMA's Investment Management Standing Committee;*
- *14 December 2023, Teleconference of ESMA's Senior Supervisors Forum on markets;*
- *15 December 2023, Teleconference of ESMA's Proportionality and Coordination Committee;*
- *15 December 2023, Paris, Meeting of ESMA's CCP Resolution Committee;*
- *18 December 2023, Brussels, Participation in a seminar of FSMA, the Belgian regulator, on "Subtech Technologies";*
- *19 December 2023, Paris, Meeting of the European Regional Committee of IOSCO;*
- *20 September 2023, Teleconference of ESMA's Markets Standing Committee.*

ANNEX 4. TABLES

TABLE I. Fundamentals of the ATHEX and foreign Exchanges, 2023

Stock Exchange	Market Capitalisation		Annual Value of Transactions on shares (EOB)[1]		Turnover ratio[2]	No. of listed companies	Index	Closing price (Dec.2023)	Return
	(USD$ mn)	Y-o-y % Change	(USD$ mn)	y-o-y % Change	(%)				Y-o-y % Change
Athens Exchange	81,317.01	33.61%	24,748.64	28.20%	30.43%	156	GD / ATHEX	1293.14	39.53%
Deutsche Boerse	2,178,052.52	11.81%	1,114,686.17	-27.58%	51.18%	433	DAX	16751.64	20.31%
LSE Group[5]	*3,293,645.75*	*0.33%*	*662,710.86*	*-22.52%*	*20.12%*	*1872*	FTSE 100 (LSE)	7733.24	3.78%
Euronext[3]	6,889,030.99	10.19%	2,523,590.35	-12.66%	36.63%	1924	Euronext 100	1395.52	13.31%
BME Spanish Exchanges	769,575.17	12.17%	316,069.89	-12.98%	41.07%	801	IBEX 35	10102.10	22.76%
Vienna Stock Exchange	138,633.49	9.29%	26,839.70[6]	-30.34%	19.36%	855	ATX	3434.97	9.87%
Nasdaq Nordic Exchanges[4]	2,119,612.30	10.74%	743,947.03	-19.17%	35.10%	1221	OMXS30 (Stockholm)	2396.07	17.26%
Borsa Istanbul	337,585.03	61.35%	1,310,852.93	35.89%	388.30%	518	BIST 100***	7470.18	35.60%
NYSE – USA	25,564,650.47	6.25%	26,359,921.00	-12.28%	103.11%	2272	NYSE Composite	16852.90	10.99%
Nasdaq – USA	23,414,747.23	44.20%	23,710,218.54	-12.96%	101.26%	3432	NASDAQ Composite	15011.35	43.42%
Japan Exchange Group	6,149,200.18	22.96%	6,333,214.46	8.11%	102.99%	3935	Topix	2366.39	25.09%
Hong-Kong Exchanges	3,974,783.49	-12.97%	2,321,891.77	-19.97%	58.42%	2609	Hang Seng Index	17047.39	-13.82%
Shanghai Stock Exchange	6,524,756.76	-0.14%	12,576,226.69	-9.60%	192.75%	2263	Shanghai Composite	2974.93	-3.70%

Source: World Federation of Exchanges

1. Because of differences in the presentation and estimation of transaction value, the figures are not totally comparable.

2. Turnover ratio: Value of trading in shares / market capitalisation.

3. Euronext comprises the markets of Belgium, France, Ireland, Norway, the Netherlands, and Portugal.

4. Includes data from the stock exchanges of Stockholm, Copenhagen, Helsinki, Iceland, Tallinn, Riga, and Vilnius.

5. The LSE data on market capitalisation, the annual value of transactions and the number of listed companies concern the period up to August 2023.

6. The total value of transactions does not include November 2023 data, which were not available

TABLE II. Market Share and Total Assets per MFMC, 2021-2023

MFMC	31.12.2023				30.12.2022				31.12.2021			
	Number of M/F	Assets (€ mil.)	Market share (%)	Change in Share	Number of M/F	Assets (€ mil.)	Market share (%)	Change in Share	Number of M/F	Assets (€ mil.)	Market share (%)	Change in Share
EUROBANK ASSET MANAGEMENT (EFG)	134	4,180.31	26.47	-1.82	128	3,078.35	28.29	-0.52	131	3,204.82	28.8	1.39
ALPHA ASSET MANAGEMENT	58	3,449.56	21.84	0.6	48	2,311.96	21.24	0.07	41	**2.354,77**	21.17	2.36
PIRAEUS ASSET MANAGEMENT	57	3,237.91	20.5	1.73	52	2,042.72	18.77	0.18	59	2,068.03	18.59	4.68
HELLENIC PENSION FUND MANAGEMENT	2	1,749.61	11.08	-2.14	2	1,438.95	13.22	-0.5	2	1,526.19	13.72	-4.28
NBG ASSET MANAGEMENT	36	1,660.89	10.52	1.66	26	963.78	8.86	0.73	25	904	8.13	-2.07
ALPHA TRUST	17	364.46	2.31	-0.44	17	299.81	2.75	0.15	18	289.72	2.6	-0.55
3K INVESTMENT PARTNERS	13	326.05	2.06	0.18	12	204.71	1.88	0.35	10	170.43	1.53	0.03
TRITON ASSET MANAGEMENT	21	359.36	2.28	0.82	6	158.66	1.46	0.02	6	160.32	1.44	-0.54
NN *	13	137.31	0.87	-0.21	12	117.91	1.08	-0.13	12	134.59	1.21	-0.46
ALLIANZ	17	149.36	0.95	0.19	7	82.25	0.76	-0.12	7	98.1	0.88	-0.33
EVROPAIKI PISTI (EUROPEAN RELIANCE) ASSET MANAGEMENT**					10	66.56	0.61	-0.22	9	91.9	0.83	-0.19
OPTIMA ASSET MANAGEMENT	9	106.84	0.68	0.16	7	56.07	0.52	0.02	7	56.53	0.51	0.09
ATTICA WEALTH MANAGEMENT	6	41.83	0.26	-0.07	6	36.31	0.33	-0.04	6	41.67	0.37	-0.11
ATHOS ASSET MANAGEMENT	19	31.67	0.2	-0.03	19	24.61	0.23	0.01	19	24.63	0.22	-0.02
TOTAL	**402**	**15,795.52**	**100**		**352**	**10,882.64**	**100**		**352**	**11,125.94**	**100**	

Source: Hellenic Fund & Asset Management Association.

*Note.: *Company name changed from Metlife MFMC (28.3.2022)*

***Acquisition of s.c. EVROPAIKI PISTI (EUROPEAN RELIANCE) ASSET MANAGEMENT and absorption by ALLIANZ MFMC (1.11.2023)*

TABLE III Distribution of mutual fund assets (%) per MFMC, 31.12.2023

MFMC	Bond	Balanced	Equity	MMF	Funds of Funds	Index	Specialist
3K INVESTMENT PARTNERS	18.49%	1.52%	79.99%				
ALLIANZ	24.57%	28.70%	44.25%		2.48		
ALPHA ASSET MANAGEMENT	34.96%	25.51%	16.32%	1.31%	9.91%	0.84%	11.13%
ALPHA TRUST	10.56%	36.72%	32.42%	7.35%	12.95%		
ATHOS ASSET MANAGEMENT	36.44%	12.41%	51.16%				
ATTICA WEALTH MANAGEMENT	30.94%	38.31%	28.53%		2.22%		
EUROBANK EFG ASSET MANAGEMENT	38.75%	1.43%	7.63%	10.64%	35.09%		6.47%
NN	36.43%	5.87%	52.70%	5.00%			
OPTIMA ASSET MANAGEMENT MFMF	36.40%	25.520%	27.66%		10.43%		
TRITON ASSET MANAGEMENT	9.48%	22.34%	50.56%	12.39%	5.23%		
HELLENIC PENSION FUND MANAGEMENT	21.10%	78.90%					
NBG ASSET MANAGEMENT	63.13%	21.09%	10.15%		5.62%		
PIRAEUS ASSET MANAGEMENT	61.27%	4.74%	16.06%	6.46%	11.48%		
MARKET SHARES	**41.22%**	**19.89%**	**14.74%**	**4.92%**	**14.91%**	**0.18%**	**4.14%**

Source: Hellenic Fund & Asset Management Association.

TABLE IV. Annual Returns of Mutual Funds, 2021-2023

M/F Classification	Annual return (%)		
	2023	2022	2021
EQUITY			
Equity Funds – North America	23.32	-16.49	24.56
Equity Funds - Developed Countries	13.83	-10.66	23.46
Equity Funds - Emerging Markets	8.71	-32.46	19.34
Index Equity Funds	41.24	4.56	13.64
Equity Funds - Global	20.16	-14.49	14.27
Equity Funds - Greece	39.32	4.23	15.55
Equity Funds - Eurozone	15.31	-9.28	17.93
BOND			
International Bond M/Fs	5.10	-6.1	1.53
Bond Funds - Greece	10.12	-11.25	-0.09
Government Bond Funds - Developed Countries	3.57	-7.71	-0.09
Government Bond Funds – Emerging Countries (until 20.1.2022)		-3.9	-3.62
Corporate Bond Funds - Investment Grade	3.80	-7.59	0.35
BALANCED			
Balanced Mutual Funds	16.20	-6.6	7.91
MONEY MARKET			
Variable NAV MMFs	2.24	-0.41	-0.52
SPECIALIST FUNDS			
Absolute Return MFs	4.20	-4.01	0.1
Specialist Funds (Special Type)	5.86	-8.19	-0.9
FUNDS of FUNDS			
Equity Funds of Funds	8.38	-14.11	15.59
Balanced Funds of Funds	6.40	-10.68	8.24
Bond Funds of Funds	3.12	-8.84	0.09

Source: Hellenic Fund & Asset Management Association.

TABLE V. M/F Net Assets, ATHEX-listed company capitalisation and the GD/ATHEX, 2021-2023

Month / Year	M/F net asses (€ mn)	Monthly Change (%)	Capitalization of ATHEX companies(€ million)	ATHEX Composite Price Index	Monthly Change (%)
Dec-23	15,795.52	4.07%	87,514.31	1,293.14	1.41%
Nov-23	15,177.18	6.16%	86,866.37	1,275.13	6.88%
Oct-23	14,296.04	2.02%	81,346.55	1,193.10	-1.34%
Sep-23	14,013.49	-1.25%	81,841.83	1,209.34	-7.86%
Aug-23	14,191.39	0.23%	88,290.93	1,312.49	-1.72%
Jul-23	14,159.28	3.85%	89,607.49	1,335.48	4.45%
Jun-23	13,633.77	4.24%	86,268.19	1,278.61	4.92%
May-23	13,079.47	3.86%	82,738.34	1,218.65	12.31%
Apr-23	12,592.88	1.88%	75,463.79	1,085.11	2.89%
Mar-23	12,360.94	-0.52%	73,396.11	1,054.59	-6.61%
Feb-23	12,425.27	5.99%	77,414.46	1,129.25	10.41%
Jan-23	11,723.41	7.72%	70,934.00	1,022.82	10.01%
Dec-22	10,883.10	-0.52%	65,861.95	929.79	1.91%
Nov-22	10,939.64	4.84%	64,790.44	912.33	4.35%
Oct-22	10,434.19	2.89%	62,589.72	874.27	10.26%
Sep-22	10,141.08	-3.18%	57,908.23	792.9	-7.41%
Aug-22	10,474.07	-1.09%	62,132.56	856.36	0.62%
Jul-22	10,590.01	4.21%	61,932.61	851.05	5.01%
Jun-22	10,161.99	-4.49%	58,983.61	810.42	-9.01%
May-22	10,639.63	-1.88%	63,736.26	890.7	-3.44%
Apr-22	10,844.00	0.75%	65,760.43	922.43	4.89%
Mar-22	10,763.17	-0.03%	63,298.94	879.45	-1.36%
Feb-22	10,766.33	-3.48%	65,406.33	891.58	-4.82%
Jan-22	11,154.78	0.26%	69,270.89	936.77	4.86%
Dec-21	11,125.94	2.39%	66,078.32	893.34	2.95%
Nov-21	10,865.23	1.07%	64,190.01	867.71	-3.38%
Oct-21	10,750.52	2.52%	64,428.97	898.06	3.78%
Sep-21	10,486.06	0.33%	62,166.83	865.34	-6.26%
Aug-21	10,451.16	2.84%	66,173.98	923.15	3.93%
Jul-21	10,162.16	3.15%	63,335.00	888.26	0.38%
Jun-21	9,851.64	4.70%	62,268.14	884.89	-1.11%
May-21	9,409.62	2.26%	62,822.80	894.85	-1.70%
Apr-21	9,201.77	4.00%	60,335.00	910.37	5.24%
Mar-21	8,847.62	5.96%	57,817.38	865.05	9.17%
Feb-21	8,349.93	2.48%	53,561.93	792.38	5.73%
Jan-21	8,148.20	0.67%	50,934.58	749.46	-7.36%

TABLE VI. Listed PIC data, 31.12.2023

PIC	Share Price (€)	Book Value of Share(euros)	Premium / Discount (%)	Internal Rate of Return	Net Asset Value (€ million)
ALPHA TRUST ANDROMEDA	6.36	8.38	-22.91%	21.46%	29.98

Source: Hellenic Fund & Asset Management Association

TABLE VII. Net assets of investment funds in EU member-states, 2022-2023

Member state	Total Assets (€ mn)		UCITS market net assets (€ million)		AIF market net assets (€ million)	
	31.12.2023	31.12.2022	12/31/2023	31.12.2022	12/31/2023	31.12.2022
Austria	211,426.8	198,708.6	97,637.2	90,757.6	113,789.6	107,951.0
Belgium	201,722.7	183,440.7	200,163.2	181,337.8	1,559.6	2,102.8
Bulgaria	1,407.1	1,287.4	1,261.8	1,158.6	145.3	128.8
Croatia	2,838.6	2,831.8	2,288.8	2,165.2	549.9	666.6
Cyprus	6,260.0	7,353.0	508.0	450.0	5,752.0	6,903.0
Czechia	26,764.0	21,262.5	24,120.9	18,777.4	2,643.2	2,485.1
Denmark	275,443.8	282,394.2	173,105.9	157,399.8	102,337.9	124,994.4
Finland	149,424.1	137,712.4	131,133.1	118,210.4	18,291.1	19,501.9
France	2,276,860.0	2,096,387.0	915,830.0	836,188.0	1,361,030.0	1,260,199.0
Germany	2,652,861.2	2,590,983.0	486,666.3	451,950.0	2,166,194.9	2,139,033.0
Greece	18,266.9	13,205.7	12,873.9	8,159.8	5,393.0	5,045.9
Hungary	36,606.0	23,207.5	1,554.5	1,252.1	35,051.4	21,955.4
Ireland	4,082,728.0	3,655,520.0	3,217,438.0	2,814,091.0	865,290.0	841,429.0

Member state	Total Assets (€ mn)		UCITS market net assets (€ million)		AIF market net assets (€ million)	
	31.12.2023	31.12.2022	12/31/2023	31.12.2022	12/31/2023	31.12.2022
Italy	373,447.5	340,557.3	251,239.7	228,338.1	122,207.8	112,219.1
Lichtenstein	126,749.3	70,104.7	34,599.6	31,669.5	92,149.8	38,435.2
Luxembourg	5,285,010.0	5,028,456.0	4,291,294.0	4,077,723.0	993,716.0	950,733.0
Malta	19,814.6	19,800.8	2,914.9	2,756.5	16,899.7	17,044.2
Netherlands	826,280.3	772,984.3	81,857.7	70,894.2	744,422.5	702,090.1
Norway	173,082.4	157,900.0	164,525.7	157,900.0	8,556.7	
Poland	73,796.0	56,904.9	28,571.5	20,474.9	45,224.6	36,430.0
Portugal	33,065.5	29,367.0	17,857.2	16,325.5	15,208.2	13,041.4
Romania	7,096.7	8,436.6	3,504.4	3,015.2	3,592.2	5,421.4
Slovakia	9,632.9	8,795.0	6,526.3	5,994.2	3,106.6	2,800.8
Slovenia	5,477.4	4,447.2	4,786.3	3,934.5	691.0	512.6
Spain	364,136.0	322,692.0	326,421.0	288,674.0	37,715.0	34,018.0
Sweden	584,557.4	495,244.4	557,470.1	470,249.1	27,087.3	24,995.4
Switzerland	883,046.1	756,554.5	692,389.2	584,372.4	190,656.9	172,182.1
United Kingdom	1,909,430.7	1,758,436.5	1,371,924.1	1,272,829.3	537,506.5	485,607.1

Source: EFAMA

TABLE VIII. Structure of mutual fund assets in EU member-states, 2022-2023

Type of M/F	31.12.2023		31.12.2022	
	Total Assets (€ billion)	% of Total	Total Assets (€ billion)	% of Total
Equity	5,787	44.01%	5,124	42.88%
Balanced	2,076	15.79%	2,041	17.08%
Bond	3,181	24.19%	2,846	23.81%
Money market	1,708	12.99%	1,544	12.92%
Guaranteed	14	0.11%	12	0.10%
Other	296	2.25%	303	2.54%
ARIS*	87	0.66%	81	0.68%
TOTAL	**13,149**	**100.00%**	**11,951**	**100.00%**

Source: EFAMA

**Absolute return innovative strategies (ARIS)*

TABLE IX. Changes in OIF assets, 31.12.2023

AA	OCCUPATIONAL INSURANCE FUNDS	Portfolio Valuation 31.12.2022	Portfolio Valuation 31.12.2023	Change y-o-y
1	OCCUPATIONAL INSURANCE FUND FOR ASSISTANCE TO INSURERS AND PERSONNEL OF INSURANCE COMPANIES (TEA-EAPAE, legal person governed by private law)	687,225,380	754,649,889	9.81%
2	OCCUPATIONAL INSURANCE FUND FOR FOOD TRADE EMPLOYEES (TEAYET, legal person governed by private law)	493,241,301	573,618,125	16.30%
3	OCCUPATIONAL INSURANCE FUND FOR PHARMACEUTICAL EMPLOYEES (TEAYFE, legal person governed by private law)	325,167,042	381,492,140	17.32%
4	SUPPLEMENTARY OCCUPATIONAL INSURANCE FUND FOR PERSONNEL OF PETROLEUM COMPANIES (ETEAPEP, legal person governed by private law)	39,569,566	46,653,383	17.90%
5	OCCUPATIONAL INSURANCE FUND FOR POLICE OFFICERS, FIREFIGHTERS AND COAST GUARD OFFICERS (TEAAAPL, a legal person governed by private law)	28,530,374	34,866,029	22.21%
6	OCCUPATIONAL PENSION FUND OF THE PERSONNEL OF INTERAMERICAN (TEA INTERAMERICAN-legal person governed by private law)	24,954,711	27,299,831	9.40%
7	PIRAEUS BANK'S GROUP PERSONNEL INSTITUTION FOR OCCUPATIONAL RETIREMENT, LIFE AND MEDICAL PROVISION	31,788,598	46,517,078	46.33%
8	OCCUPATIONAL INSURANCE FUND OF JOHNSON & JOHNSON, JOHNSON & JOHNSON CONSUMER AND JANSSEN–CILAG EMPLOYEES (TEA J&J/JC-legal person governed by private law)	18,887,032	17,247,391	-8.68%
9	OCCUPATIONAL INSURANCE FUND FOR ECONOMISTS (ETAO, legal person governed by private law)	18,631,940	20,967,115	12.53%
10	OCCUPATIONAL INSURANCE FUND OF THE HELLENIC POST (TEA ELTA, legal person governed by private law)	15,565,249	18,163,089	16.69%
11	OCCUPATIONAL INSURANCE FUND OF THE MEDICAL CHAMBER OF THESSALONIKI (TEAISTh - legal person governed by private law)	16,329,027	22,493,852	37.75%
12	OCCUPATIONAL PENSION FUND OF THE INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS OF GREECE (TEA SOEL - legal person governed by private law)	10,524,069	13,005,043	23.57%
13	OCCUPATIONAL INSURANCE FUND OF BETA CAE SYSTEMS S.A. - legal person governed by private law (TEA BETA CAE SYSTEMS)	11,109,334	16,413,386	47.74%
14	ACCENTURE’S PERSONNEL INSTITUTION FOR OCCUPATIONAL RETIREMENT, LIFE KAI MEDICAL PROVISION (TEA ACCENTURE legal person governed by private law)	8,984,202	11,886,076	32.30%
15	OCCUPATIONAL INSURANCE FUND OF GEOTECHNICAL CHAMBER MEMBERS (TEAGE - legal person governed by private law)	7,053,702	8,135,862	15.34%
16	OCCUPATIONAL PENSION FUND OF TSAKOS MARITIME ENTERPRISES & ASSOCIATES (TEA TSAKOS GROUP - legal person governed by private law)	7,621,556	10,017,803	31.44%

AA	OCCUPATIONAL INSURANCE FUNDS	Portfolio Valuation 31.12.2022	Portfolio Valuation 31.12.2023	Change y-o-y
17	OCCUPATIONAL INSURANCE FUND OF AIR TRAFFIC CONTROLLERS OF GREECE (TEA EEKE -legal person governed by private law)	19,568,896	31,779,330	62.40%
18	OCCUPATIONAL PENSION FUND OF INTRUM HELLAS AND INTRUM HELLAS REO SOLUTIONS	9,415,912	11,414,210	21.22%
19	OCCUPATIONAL INSURANCE FUND OF ATHENS EXCHANGE GROUP EMPLOYEES - legal person governed by private law	4,592,665	6,081,186	32.41%
20	OCCUPATIONAL INSURANCE FUND OF THE MINISTRY OF FINANCE (TEA YPOIK)	4,070,682	6,042,747	48.45%
21	INTERAMERICAN INSURANCE INTERMEDIARIES OCCUPATIONAL PENSION FUND - legal person governed by private law	2,344,500	3,235,381	38.00%
22	OCCUPATIONAL PENSION FUND OF INTERLIFE AAEGA legal person governed by private law	1,960,175	2,852,436	45.52%
23	INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION OF ATHENS INTERNATIONAL AIRPORT S.A. PERSONNEL (TEA AIA - legal person governed by private law)	4,966,230	9,884,665	99.04%
24	OCCUPATIONAL PENSION FUND OF THE HELLENIC FUND AND ASSET MANAGEMENT ASSOCIATION (TEA-ETHE - legal person governed by private law)	1,402,475	2,793,549	99.19%
25	OCCUPATIONAL PENSION FUND FOR URBAN TRANSPORT PASIAL & EA (TEA PASIAL & EA - legal person governed by private law)	1,080,251	1,103,474	2.15%
26	OCCUPATIONAL PENSION FUND OF HELLENIC CIVIL AVIATION AUTHORITY (TEA YPA - legal person governed by private law)	601,949	745,106	23.78%
27	INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION OF EUROBANK GROUP PERSONNEL –legal person governed by private law) “IORP EUROBANK’S GROUP PERSONNEL”	16,746,075	44,251,935	164.25%
28	INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION OF EUROLIFE FFH –legal person governed by private law	1,063,831	2,323,036	118.37%
29	INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION FOR EMPLOYEES AND ASSOCIATES OF DYNAMIS AND GENKA	63,300	271,748	329.30%
30	INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION OF MEDICAL ASSOCIATION OF ATHENS MEMBERS AND PERSONNEL –legal person governed by private law)		802,113	

AA	OCCUPATIONAL INSURANCE FUNDS	Portfolio Valuation 31.12.2022	Portfolio Valuation 31.12.2023	Change y-o-y
31	INSTITUTION FOR OCCUPATIONAL RETIREMENT PROVISION OF ALPHA SERVICES AND HOLDINGS GROUP PERSONNEL –legal person governed by private law)		12,559,754	
	TOTAL ASSETS	**1,813,060,024**	**2,139,566,760**	**18.01%**

Source: Preliminary OIF data collected and processed by the Hellenic Capital Market Commission. To be finalised in June 2024.

TABLE X. OIFs & IORP-OIFs, Structure of Assets, 31.12.2023

INVESTMENT CATEGORIES	*STRUCTURE OF OIF & IORP-OIF ASSETS (TOTAL MARKET)*
Bank Deposits	*65,419,941*
Bonds, Corporate bonds & Treasury Bills	*1,051,467,790*
Bonds, Corporate bonds & Treasury Bills (if issued in a member-state of the EU or the EEA)	*967,910,214*
Government Bonds	*687,024,165*
Corporate and other Bonds	*280,886,050*
Bonds & Corp. Bonds (if issued in third countries)	*83,557,576*
Government Bonds	*57,453,187*
Corporate and other Bonds	*26,104,390*
Equity	*415,945,277*
Shares listed in an exchange of an EU and EEA member-state	*243,992,282*
Shares listed in third country exchanges	*157,591,001*
Non-listed shares	*14,361,994*
Mutual Funds units or units in Undertakings for Collective Investment in Transferable Securities (UCITS) in EU and EEA member states	*586,457,291*
Shares in Alternative Investment Funds (e.g. Venture Capital Funds)	*12,233,692*
Total Assets	*2,131,523,988*

INVESTMENT CATEGORIES	*ALLOCATION OF INVESTMENTS OIF & IORP-OIF (TOTAL MARKET)*
Deposits	*3.07%*
Government Bonds	*34.93%*
Corporate and other Bonds	*14.40%*
Shares	*19.51%*
Mutual fund units	*27.51%*
Alternative Investments	*0.57%*
TOTAL	***100.00%***

Source: Hellenic Capital Market Commission.

TABLE XI. Public offering and/or listing of new securities by companies listed in the Regulated Market of the ATHEX, 2023

No	Company	Trading category	Date of approval by HCMC	Right Coupon Cut-off Date	SCI Period	Initial Trading Day for new transferable securities	Total Funds Raised (euros)	Initial Share Price (€)	Number of shares	Beneficiaries	Inv. Firm Advisor / Underwriter
1	ATTICA BANK	Main market	16/3/2023 (prospectus) & 20/4/2023 (supplementary prospectus)	27/3/2023	30/3/2023-24/4/2023	28/4/2023	473,346,868.50	13.50	35,062,731	Public offering (3.51640385951927N-1E) in favour of existing shareholders	-
2	MYTILINEOS SA	Debt Segment	28/6/2023	-	4/7/2023-6/7/2023	11/7/2023	500,000,000.00	1,000.00	500,000	Public Offering	NATIONAL BANK OF GREECE, ALPHA BANK, PIRAEUS BANK, EUROBANK, EUROXX SECURITIES SA, OPTIMA BANK
3	ATTICA BANK	Main market	24/10/2023	-	-	27/10/2023 warrants 13/11/2023 shares	*63,944,501.88	-	4,980,256 warrants 4,980,256 Shares	Pursuant to article 27A of Law 4172/2013 and the relevant provisions of Ministerial Council Act no. 28/06.07.2021 as amended by MCA	

No	Company	Trading category	Date of approval by HCMC	Right Coupon Cut-off Date	SCI Period	Initial Trading Day for new transferable securities	Total Funds Raised (euros)	Initial Share Price (€)	Number of shares	Beneficiaries	Inv. Firm Advisor / Underwriter
										34/25-08-2021	
4	INTRALOT SA	Main market	5/10/2023	10/10/2023	13/10/2023-26/10/2023	11/7/2023	135,000,000.18	0.58	232,758,621	Public Offering 0.6268123591 23923 new shares for one (1) existing share	AMBROSIA CAPITAL HELLAS SA, EUROXX SECURITIES SA., ΤΡΑΠΕΖΑ ΠΕΙΡΑΙΩΣ Α.Ε.
5	NATIONAL BANK OF GREECE S.A.	Main market	13/11/2023	-	14/11/2023-16/11/2023	-	Greek Public offering: 213,311,575.10 International offering: 853,246,295.10	5.30	Greek Public offering: 40,247,467 International offering: 160,989,867	Combined offering in Greece and abroad of existing listed shares	National Securities Single Member S.A. & EUROXX SECURITIES SA
6	IDEAL HOLDINGS SA	Debt Segment	5/12/2023	-	11/12/2023-13/12/2023	18/12/2023	100,000,000	1,000	100,000	Public Offering	NATIONAL BANK OF GREECE PIRAEUS BANK, EUROBANK, OPTIMA BANK, ATTICA BANK, PANTELAKIS SECURITIES SA, BETA SECURITIES SA ,

No	Company	Trading category	Date of approval by HCMC	Right Coupon Cut-off Date	SCI Period	Initial Trading Day for new transferable securities	Total Funds Raised (euros)	Initial Share Price (€)	Number of shares	Beneficiaries	Inv. Firm Advisor / Underwriter
7	TRASTOR REIC	Main market	21/12/2023	28/12/2023	3/1/2024-16/1/2024	24/1/2024	74,999,990.90	1.42	52,816,895	Public Offering 0.34665707600092 new shares for one (1) existing share	PIRAEUS BANK
	TOTAL (€)						2,413,849,231.66				

Source: HCMC

** Capitalisation of a special reserve of €63,944,501.88, as part of the provisions of article 27A of Law 4172/2013.*

Notes:

1. *The share capital increase through payment in cash and by way of preemptive rights in favor of the company's existing shareholders, with admission of the new shares to trading in the regulated market of the Athens Exchange was subscribed by 100%. More specifically, of the increase was subscribed by the persons that exercised their preemptive rights, through the payment of €369,634,819.50, which corresponds to 27,380,357 new shares, of which 24,370,366 new shares were subscribed by the Hellenic Financial Stability Fund (HFSF), 2,944,597 new shares were subscribed by the Electronic Single Social Security Entity (e-EFKA), and 65,394 new shares by other Investors. Following the exercise of the preemptive rights, 7,682,374 new shares remained unsold, which were distributed as follows: (a) 2,506,921 new shares, which correspond to a total amount of €33,843,433.50 were sold to "Pancreta Bank SA" and (b) 2,211,989 new shares, which correspond to a total amount of €29,861,851.50 were sold to "Thrivest Holding Ltd." Moreover, 2,963,464 new shares, which correspond to a total amount of €2,963,464 were subscribed by other Investors, whose participation in the Bank's share capital does not exceed 5%.*

2. *The public offering by payment in cash and admission to trading in the Debt Segment of the regulated market of the Athens Exchange of 500,000 common bearer dematerialised bonds of a par value of €1,000 each and a total value of €500,000,000 through the issuance of a seven-year common bond loan, was*

subscribed by 100%. The yield of the bonds upon maturity was set at 4%, the interest rate was set at 4% per annum, and the sale price was set at €1,000 each, i.e. 100% of its par value.

3. *The Bank implemented the provisions of article 27A of L. 4172/2013 ("DTC") and, pursuant to them, the creation of a special reserve (equal to 100% of the tax liability) amounting to €63,944,501.88, which was intended solely for the share capital increase, the free issuance of warrants to the Greek State, and the conversion, free of charge, of the warrants to common shares through the capitalisation of the special reserve. Shareholders and third parties had the right to redeem the warrants, which were admitted to trading in the Warrants Segment of the Regulated Securities Market of the ATHEX and subsequently were automatically converted to common registered shares of the Bank at a ratio of one warrant to one share, which were also admitted to trading in the Main Market of the Regulated Securities Market of the ATHEX.*

4. *The share capital increase through payment in cash and by way of preemptive rights in favor of the company's existing shareholders, with admission of the new shares to trading in the regulated market of the Athens Exchange was subscribed by 100%. More specifically, the increase was subscribed by 95.87% through the exercise of preemptive rights and the payment of a total amount of €129,419,941.4, which corresponds to 223,137,830 new common registered shares, and by 4.13% by persons who exercised their oversubscription right through the payment of a total amount of €5,580,058.78, which corresponds to 9,620,791 new common registered shares. Therefore, 100% of the increase was covered by subscription and oversubscription.*

5. *Public offering to investors in Greece (Greek Public offering) of existing shares, listed in the Regulated Market of the ATHEX by the seller shareholder "Hellenic Financial Stability Fund" as part of the Combined Offer (the Greek Public Offering and the International Offering). The shares were sold to investors in Greece as follows: (a) 24,148,480 shares (i.e. 60% of the shares of the Greek Public Offering) were allocated to Private Investors, through the payment of a total amount of €127,986,944.00, and (b) 16,098,987 offered shares (i.e. 40% of the shares of the Greek Public Offering) were allocated to Qualified Investors, through the payment of a total amount of €85,324,631.10. Based on the above, the Greek Public Offering consisted of a total of 40,247,467 existing shares and raised funds amounting to €213,311,575.10. It is noted that 160,989,867 shares (i.e. 80% of the total Shares Offered through the Combined Offering) were allocated to investors that participated in the International Offering, raising funds of €853,246,295.1.*

6. *The public offering by payment in cash and admission to trading in the Debt Segment of the regulated market of the Athens Exchange of 100,000 common bearer dematerialised bonds of a par value of €1,000 each and a total value of €100,000,000 through the issuance of a five-year common bond loan, was subscribed by 100%. The yield of the bonds upon maturity was set at 5.5%, the interest rate was set at 5.5% per annum, and the sale price was set at €1,000 each, i.e. 100% of its par value.*

7. *The share capital increase through payment in cash and by way of preemptive rights in favor of the company's existing shareholders, with admission of the new shares to trading in the regulated market of the Athens Exchange was subscribed by 100%. More specifically, 97.8% was subscribed by the shareholders that exercised their preemptive rights, through the payment of €73,367,269.22, which corresponds to 51,667,091 new common registered shares. The exercising of the subscription right led to absorption of the remaining 2.2% through the payment of a total amount of €1,632,721.68, which corresponds to 1,149,804 new common registered voting shares Following the above, no share remained unsold, bringing the final amount of the Share Capital Increase to €74,999,990.9.*

TABLE XII Public offering and/or admission of new securities to trading in the Regulated Market of the ATHEX for the first time, Non-listed Companies 2023

No	Company	SCI Period	Initial Trading Day	Trading segment/Sector/Sub-sector	Initial Share Price Range (€) or Interest Rate Range	Sale price or initial trading price (€)	Number of new transferable securities with Pub. Offering and/or listing	Funds Raised or Initial Trading Value (€)	Main Underwriters - Underwriters of the Pub. Offering	Advisors
1	AUSTRIACARD HOLDINGS AG	-	23/3/2023	Main market	-	13.42	18,176,934	-	-	National Bank
2	OPTIMA BANK S.A.	27/9/2023-29/9/2023	04.10.2023	Main market	€ 6.40 – € 7.20	7.20	20,499,973*	150,860,644.56*	National Bank of Greece, ALPHA BANK SA, Eurobank	ALPHA BANK SA
3	TRADE ESTATES REIC	1/11/2023-3/11/2023	10.11.2023	Main market	€ 6.40 – € 7.20	1.92	28,169,015**	55,887,327.36**	National Bank of Greece, PIRAEUS BANK SA, ALPHA BANK SA, Eurobank,	National Bank

									Optima Bank S.A., AXIA Ventures, Euroxx Securities SA	
4	ORILINA PROPERTIES REIC	4/12/2023-6/12/2023	11.12.2023	Main market	-	0.95	32,200,000	30,590,000	BETA SECURITIES SA, KYKLOS SECURITIES SA, OPTIMA BANK, LEON DEPOLAS SECURITIES SA	OPTIMA BANK
	TOTAL (€)							237,337,972***		

*20,499,973 new shares were offered by public offering, 500,027 new shares were sold to a restricted number of persons, i.e. a total of 21,000,000, which raised total funds amounting to €150,860,644.56.

**28,169,015 new shares were offered by public offering, 938,968 new shares were sold by private placement to the existing shareholder AUTOHELLAS, i.e. a total of 29,107,983, which raised total funds amounting to €55,887,327.36.

No	Allocation to Private Investors	Allocation to Qualified Investors	Total Demand from Private Investors (no.)	Total Demand from Qualified Investors (domestic and international)	Private investor oversubscription	Oversubscription by Qualified Investors	Total oversubscription*	Participating Capital (€)
1.	-	-	-	-	-	-	-	-
2.	7,584,990	12,914,983	51,625,800	24,150,728	6.81	1.87	3.70	75,776,528.00
3.	12,850,541	15,318,474	14,165,640	15,318,474	1.10	1.00	1.05	29,484,114.00
4	8,203,824	23,996,176	8,203,824	32,343,904	1.00	1.35	1.26	38,520,342

Source: HCMC
**Weighted oversubscription*

Notes:

1. *Initial admission of all 18,176,934 shares of "AUSTRIACARD HOLDINGS AG" (the "Company") to trading in the Regulated Market of the Athens Exchange and the Vienna Stock Exchange (16,862,067 existing and 1,314,867 new shares issued following the Company's share capital increase as part of the cross-border merger by absorption of "INFORM P. LYKOS SA HOLDINGS" by the Company in implementation of Austrian law on cross-border mergers in the European Union). The initial trading price for the company's shares was set by the Management Board to €13.42 per share (based on the valuation included in the "Fairness Opinion" by "PwC Advisory Services GmbH" dated 15.12.2022).*

2. *Initial Public offering by payment in cash with abolition of preemptive rights in favor of existing shareholders and admission of all 73,694,142 shares in the Regulated Market of the ATHEX, which was subscribed by 100% through the payment of a total amount of €150,860,644.56, which corresponds to 21,000,000 new, common registered shares The new shares were allocated as follows: a) 20,499,973 new common shares through the Public Offering at an sale price of €7.20, and b) 500,027 new common shares through the Simultaneous Placement of Shares with a restricted number of persons, and more specifically, 471,327 new shares were sold to the company's personnel at a sale price of €6.48 and 28,700 new shares were sold to associates of the company at a sale price of €7.20.*

3. *Initial Public offering by payment in cash with abolition of preemptive rights in favor of existing shareholders and admission of all 120,528,771 shares in the Regulated Market of the ATHEX. The new shares were allocated as follows: a) 28,169,015 new common shares through the Public Offering with the payment of a total amount of €54,084,508.80 and b) 938,968 new common shares through Private Placement with the existing shareholder "AUTOHELLAS SA" and the payment of a total amount of €1,802,818.56. It is noted that at the same time 905,156 new shares were allocated free of charge and were admitted to trading in the ATHEX, as part of the Increase through Capitalization of Distributable Reserves, in accordance with article 114 of Law 4548/18. Based on the above, the total number of new shares issued stood at 30,013,139.*

4. *Initial Public offering by payment in cash with abolition of preemptive rights in favor of existing shareholders and admission of all 138,218,440 shares in the Regulated Market of the ATHEX, which was subscribed by 100% through the payment of a total amount of €30,590,000, which corresponds to 32,200,000 new, common registered shares, at a sale price of €0.95 each. It is noted that at the same time 1,018,440 new shares were allocated free of charge and were admitted to trading in the ATHEX, as part of the Increase through Capitalization of Previous Year Profits, in accordance with article 114 of Law 4548/18. Based on the above, the total number of new shares issued stood at 33,218,440.*

TABLE XIII Trading Status of companies listed in the regulated market of the ATHEX, 31.12.2023

Market	Under regular trading	Under Suspension	Total
Main market	125		
Under surveillance	10		
Total number of companies with shares listed in the Securities Market	**135**	**5**	**140**
Total number of companies with bonds listed in the Debt Segment	**16***		**5**
Grand Total			**145**

* Out of 16 companies with bonds listed in the Securities Market, 11 also have shares listed in the same market.

Non-listed Companies the shares of which were listed for the first time in the ATHEX in 2023	
Company	**Date**
AUSTRIACARD HOLDINGS AG	27.01.2023
OPTIMA BANK S.A.	04.10.2023
TRADE ESTATES REIC	10.11.2023
GRIVALIA PROPERTIES REIC	11.12.2023

Companies the common bonds of which were listed in the ATHEX in 2023	
Company	**Date**
MYTILINEOS SA	27.06.2023
IDEAL HOLDINGS SA	04.12.2023

Companies the shares of which were de-listed from the ATHEX in 2023				
No	**Company**	**Date**	**Reasoning**	**Previous status**
1	INFORM P. LYKOS SA HOLDING	17.03.2023	Merger by absorption	Securities Market
2	AEGEK SA	21.04.2023	Decision of the Listings & Markets Operation Committee of the ATHEX	Securities Market
3	OLD NAOUSSA WINES HOLDING SA	21.04.2023	Decision of the Listings & Markets Operation Committee of the ATHEX	Securities Market
4	DIONIC SA	21.04.2023	Decision of the Listings & Markets Operation Committee of the ATHEX	Securities Market
5	AVEPE VARANGIS	21.04.2023	Decision of the Listings & Markets Operation Committee of the ATHEX	Securities Market
6	CORAL SA	11.05.2023	Total bond repayment	Debt Segment
7	PLAISIO COMPUTERS SA	12.05.2023	HCMC Decision in accordance with par. 5, article 17 L.3371/2005	Securities Market
8	B&F GARMENT INDUSTRIES SA	26.06.2023	Total bond repayment	Debt Segment
9	ANEK SA	05.12.2023	Merger by absorption	Securities Market
10	ELGEKA SA	27.12.2023	HCMC Decision in accordance with par. 5, article 17 L.3371/2005	Securities Market
11	EVLIEMEK	29.12.2023	Decision of the ATHEX Steering Committee	Securities Market
12	FOLLI FOLLIE DUTY FREE SHOPS SA	29.12.2023	Decision of the Listings & Markets Operation Committee of the ATHEX	Securities Market

Companies under surveillance as per 31.12.2023					
No	**Company**	**Date ***	No	**Company**	**Date ***
1.	SATO SA	08.04.2011	6.	PROODEFTIKI SA	15.02.2018
2.	YALCO - SD CONSTANTINOU & SON SA	08.04.2011	7.	WOOL INDUSTRY TRIA ALFA SA	25.10.2018
3.	FRIGOGLASS SA	15.04.2016	8.	SELECTED TEXTILE IND. SA	07.11.2018
4.	BITROS HOLDING SA	10.05.2017	9.	VIS SA	09.07.2020
5.	BIOTER SA	11.12.2017	10.	THE HOUSE OF AGRICULTURE SPIROY S.A.	14.05.2021

** The date when the company was excluded from normal trading status and put under surveillance.*

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The Annual Reports of the Hellenic Capital Market Commission are listed, in chronological order, at: http://www.hcmc.gr/el_GR/web/portal/annualreports