

HCMC's Survey on fees and charges applicable on UCITS in Greece

The HCMC has undertaken a research project collecting and analyzing 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 authorized by the HCMC) for the years 2016, 2017, 2018 and 2019. The analysis of said data by the Research Division was performed both per category of funds (equity, bond, money market, structured) as well as per type of charges (Distribution Fees, Entry/Exit Fees (Redemption Fees), Ongoing Charges, Performance Fees). The analysis of the data submitted by MFMCs shows that in 2019, 14 MFMCs were operating in Greece, as 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 2019 stood at 207 (146 M/Fs if different classes of units are not taken into account), as compared to 203 in 2018 (145 M/Fs if different classes of units are not taken into account), 173 in 2017 (150 M/Fs if different classes of units are not taken into account) and 161 in 2016 (160 M/Fs if different classes of units are not taken into account).

More specifically, the following table presents the total number of mutual funds in 2019, 2018, 2017, and 2016, both taking and not taking into account different classes of units as different M/Fs.

M/F Category:	2019 Number of M/Fs (with unit classes)	2019 Number of M/Fs (without different unit classes)	2018 Number of M/Fs (with unit classes)	2018 Number of M/Fs (without different unit classes)	2017 Number of M/Fs (with unit classes)	2017 Number of M/Fs (without different unit classes)	2016 Number of M/Fs (with unit classes)	2016 Number of M/Fs (without different unit classes)
Balanced	38	31	39	31	31	29	31	30
Bond	69	45	54	36	42	36	33	33
Equity	59	40	56	39	53	45	50	50
Balanced FoFs	8	6	9	7	7	7	8	8
Bond FoFs	4	3	4	3	3	3	3	3
Equity FoFs	18	12	18	12	17	12	12	12
Money market	10	8	22	16	18	16	16	16
Specialist	1	1	1	1	2	2	8	8
Total M/Fs	207	146	203	145	173	150	161	160

Source: Hellenic Capital Markets Commission

The following table presents the averages of the aforementioned charges for the years 2016, 2017, 2018 and 2019, both for UCITS 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).

AVERAGE CHARGES PER M/F CATEGORY					
Category	Period	Subscription fee (%) per unit class	Redemption fee (%) per unit class	Ongoing Charges (%)¹	Performance fee (%) per unit class
TOTAL M/Fs	2019Y	0.30%	0.25%	1.91%	0.29%
	2018Y	0.31%	0.24%	2.08%	0.15%
	2017Y	0.40%	0.31%	2.36%	0.10%
	2016Y	0.47%	0.36%	2.28%	0.03%
BALANCED	2019Y	0.54%	0.36%	1.97%	0.56%
	2018Y	0.54%	0.34%	2.15%	0.03%
	2017Y	0.74%	0.45%	2.33%	0.22%
	2016Y	0.61%	0.47%	2.28%	0.04%
BOND	2019Y	0.20%	0.20%	1.21%	0.29%
	2018Y	0.21%	0.21%	1.44%	0.00%
	2017Y	0.24%	0.23%	1.53%	0.05%
	2016Y	0.33%	0.26%	1.56%	0.03%
EQUITY	2019Y	0.31%	0.27%	2.56%	0.25%
	2018Y	0.34%	0.28%	2.83%	0.51%

¹ 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 departments thereof. 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%) over 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 departments 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;

	2017Y	0.41%	0.36%	3.13%	0.12%
	2016Y	0.45%	0.38%	3.10%	0.05%
BALANCED FoFs	2019Y	0.11%	0.20%	1.88%	0.30%
	2018Y	0.11%	0.17%	2.19%	0.00%
	2017Y	0.26%	0.19%	2.39%	0.15%
	2016Y	0.04%	0.33%	2.04%	0.00%
BOND FoFs	2019Y	0.04%	0.25%	1.38%	0.02%
	2018Y	0.04%	0.25%	1.45%	0.00%
	2017Y	0.10%	0.34%	1.71%	0.00%
	2016Y	0.00%	0.36%	1.56%	0.00%
EQUITY FoFs	2019Y	0.29%	0.29%	3.22%	0.00%
	2018Y	0.40%	0.29%	3.41%	0.00%
	2017Y	0.36%	0.37%	3.97%	0.01%
	2016Y	0.58%	0.51%	3.89%	0.00%
MONEY MARKET	2019Y	0.06%	0.00%	0.52%	-
	2018Y	0.01%	0.02%	0.57%	0.00%
	2017Y	0.00%	0.03%	0.65%	0.00%
	2016Y	0.00%	0.03%	0.65%	0.00%
SPECIALIST FUNDS	2019Y	3.00%	0.50%	1.87%	-
	2018Y	3.00%	0.50%	1.87%	0.00%
	2017Y	3.00%	0.50%	1.87%	0.00%
	2016Y	2.00%	0.62%	1.43%	0.00%

Source: Hellenic Capital Market Commission

Based on the above data, in 2019 subscription fees and ongoing charges for all UCITS **of all categories** were **reduced** (by -0.0077 and -0.1695 percentage points respectively), and on average stood at 0.30% and 1.91% respectively, as compared to 0.31% and 2.078% to 2018, 0.396% and 2.353% in 2017 and 0.470% and 2.279% in 2016. It should be noted that ongoing charges decreased across all M/F categories, excluding specialist M/Fs, where they remained at the previous year's levels.

In contrast, redemption fees for all UCITS **of all categories** were marginally increased by 0.0095 percentage points as compared to 2018, and on average stood at 0.25%, as compared to 0.243% in 2018, 0.304% in 2017 and 0.355% in 2016.

In 2020, performance fees **increased** year-on-year across **all UCITS categories for which there were available data** (Money Market, Equity FoFs, and Specialist), with the **exception of Equity FoFs**, where they were reduced (-0.2666 percentage points).

More specifically, performance fees across all UCITS categories increased by 0.1449 percentage points (0.29% on average in 2019, as compared to 0.147% in 2018 and 0.095% in 2017)