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HELLENIC REPUBLIC HELLENIC CAPITAL MARKET COMMITTEE PLLE POSTED ONLINE

Circular no.52

Subject: Clarifications on the information of the Annual Report as per article 10 ar.2 of the Decision 1/506/2009 of the Capital Market Committee with regard to the prevention and combatting the money laundering and terrorism financing.

This circular is addressed to Companies that are monitored by the Capital Market Committee within article 6 par.2 case b of the Law 3691/08 with regard to the prevention and combatting of money laundering and terrorism financing and is intended to ensure the common, single and full application of the regulations and purposes sought by law 3691/2008 and the Decision 1/506/2009 of the Capital Market Committee.

In this context and following the Circular 49/2012 of the Capital Market Committee that clarified issues of the Law 3691/2008 and of the Decision 1/506/009of the Capital Market Committee for the full specification of the information that should be included in the Annual Report prepared by the Officer of Compliance of the monitored Companies, which is submitted to the Capital Market Committee every July, the following are noted:

I. The information that article 10 par.2 of the Decision 1/506/2009 of the Capital Market Committee specifies that it will be included in the foregoing Annual Report, as clarified in par.A1 of the Circular 49/2012 of the Capital Market Committee and especially the information provided based on the case f, should,

i) in addition to the indication of the total number of the high risk clients (total number of high risk clients)

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ii) include the number of high risk clients that carried out transactions within the year that is referred to in the above Annual Report (total number of active high risk clients).

Moreover it should,

iii) include the number of all the clients of the Company in total, namely regardless of the risk category (**total number of clients**) as well as

iv) include separately, the number of active clients of the Company in total, namely, regardless of the risk category, that carried out transactions within the year that is referred to in the above Annual Report (**total number of active clients**).

II. The information that article 10 par.2 of the Decision 1/506/2009 of the Capital Market Committee specifies that it will be included in the foregoing Annual Report and especially the information provided based on the case a, should, include the date of the **last amendment** of the written internal audit and communication procedures established by the Companies to prevent and to hinder the transactions connected with money laundering and terrorism financing.

Athens, May 22nd 2014

True translation of the attached document in Greek Athens, 17/1/2018. Translated by Elina Tsagli

EAAHNIKH AHMOKPATIA, ΥΠΟΥΡΓΕΙΟ ΕΞΩΤΕΡΙΚΩΝ METAΦΡΑΣΤΙΚΗ ΥΠΗΡΕΣΙΑ REPUBLIQUE HELLENIQUE, MINISTERE DES AFFAIRES ETRANGERES SERVICE DE TRADUCTION HELLENIC REPUBLIC, MINISTRY OF FOREIGN AFFAIRS TRANSLATION SERVICE