HELLENIC REPUBLIC

CAPITAL MARKET COMMISSION

Decision of the Hellenic Capital Market Commission on the Designation of the ATHEX Composite Share Price Index and the FTSE ATHEX Large Cap Index as Significant Benchmarks pursuant to Article 24(3) of Regulation (EU) 2016/1011 of the European Parliament and of the Council (BMR)

By virtue of Decision No. 14/1103/29.09.2026, the Board of Directors of the Hellenic Capital Market Commission (HCMC) designates the ATHEX Composite Share Price Index and the FTSE ATHEX Large Cap Index as significant benchmarks pursuant to Article 24(3) of Regulation (EU) 2016/1011 of the European Parliament and of the Council (hereinafter referred to as the "BMR").

The aforementioned decision is based, in particular, on the following:

(a) the HCMC's assessment of whether the conditions laid down in Article 24(3) of the BMR are met;

(b) the consultation with the benchmark administrator; and

(c) the positive opinion issued by ESMA on 18 September 2026 (ESMA 81-1841807023-1137).

Based on the HCMC's assessment, sufficient grounds exist to justify the designation of the aforementioned indices as significant benchmarks, in accordance with the following qualitative criteria:

i. Both the ATHEX Composite Share Price Index and the FTSE ATHEX Large Cap Index are flagship benchmarks of the Greek equity market. The indices are calculated on the basis of the market capitalisation of the constituent shares, adjusted for free float and weighted by market capitalisation, while their composition includes companies meeting specific liquidity and investability criteria. This ensures that the constituent shares are representative of the securities actively traded on the market.

The widespread recognition of both indices as benchmarks for assessing the performance of the Greek equity market by market participants, institutional and retail investors, the media, public authorities and the general public is further evidenced by their significant market coverage. In particular, the ATHEX Composite Share Price Index represents 95.4% of the total market capitalisation and 97.9% of the total trading value of the Greek equity market. The corresponding figures for the FTSE ATHEX Large Cap Index are 86.9% and 93.3%, respectively.

ii. The cessation of publication of either or both indices, as well as their continued provision on the basis of unreliable or unrepresentative data, would jeopardise their reliability and robustness, thereby undermining investor confidence in the Greek equity market. Furthermore, given the significant role played by these indices in the market, such an eventuality, although unlikely, could have serious implications for market integrity and the Greek economy.

iii. Neither index has been designated as a significant benchmark by a competent authority of another Member State.

iv. No suitable alternative benchmarks derived from the market are available that would constitute functionally equivalent substitutes for the indices in question. In particular, replicating and reproducing these indices by another administrator would be practically challenging due to their specific characteristics and their adaptation to the particular conditions and features of the Greek equity market.

v. Both indices have a long-standing history in the Greek market. The ATHEX Composite Share Price Index has existed since 1980, originally under the name "General Price Index of the Athens Stock Exchange", while the FTSE ATHEX Large Cap Index has been provided since 1997. Their long-standing presence constitutes further evidence of their established and widely recognised role as benchmarks for the Greek equity market.

In view of the foregoing, the HCMC considers that designating the two indices as significant benchmarks ensures that an appropriate level of regulation and supervision is maintained under the new regime established pursuant to the BMR.

Benchmark Administrator

Following the resolution adopted by the Extraordinary General Meeting of Euronext Athens on 22 September 2026, approving the hive-down and, in particular, the "Draft Demerger Agreement" concerning the "Market Operator" business division, the said business division was transferred to, and absorbed by, the newly incorporated company under the corporate name "Euronext Athens Single Member S.A." and the trade name "Euronext Athens".

The demerged business division comprises the activities relating to the operation of the regulated securities and derivatives markets, as well as the Multilateral Trading Facility (MTF).

As part of the aforementioned corporate reorganisation, with effect from 30 September 2026, all assets and liabilities associated with the "Market Operator" business division were transferred, by way of universal succession, to the newly incorporated company "Euronext Athens Single Member S.A." (hereinafter referred to as the "Transferee"). These assets and liabilities include the relevant activities relating to the regulated market and the MTF, the assets, contracts, systems, personnel and supervisory relationships, as well as the company's registration as a benchmark administrator pursuant to Article 34 of the BMR.

Accordingly, as of 30 September 2026, the organisational requirements, arrangements and procedures laid down in Title II of the BMR continue to apply without change within the framework of the Transferee, namely Euronext Athens Single Member S.A. (Euronext Athens).

Consequences of the Designation

In light of the foregoing, the following consequences take effect as of 30 September 2026:

The ATHEX Composite Share Price Index and the FTSE ATHEX Large Cap Index fall within the specific regulatory regime established by the BMR for significant benchmarks.

Euronext Athens (LEI 6354005U641THK2OXO52) will be entered in ESMA's register of benchmark administrators as the administrator of the two aforementioned indices.

The decision shall be notified to ESMA for the purposes set out in Regulation (EU) 2016/1011 and, in particular, to enable Euronext Athens to be entered in the register referred to in Article 36 of the BMR as the administrator of the aforementioned benchmarks.