

Done at Athens, Greece, on April 14, 2019

**NOTIFICATION of GREECE
under Article 52(4) of the UCITS Directive**

I. List of issuers and issues

Issuers	Issues				Status of offered guarantees
	Issue number	Amount of issue	Date of issue	Maturity	
National Bank of Greece SA	XS1499589833	€ 1.50 billion	5.10.2016	5.04.2021 & Extended maturity April 2053	
National Bank of Greece SA	XS1865329533	€ 0.50 billion	14.08.2018	14.8.2019 & Extended Maturity August 2051	
National Bank of Greece SA	XS1860479077	€ 0.20 billion	30.08.2018	28.07.2023 & Extended Maturity October 2051	
National Bank of Greece SA	XS1698932925	€ 0.75 billion	19.10.2017	19.10.2020 & Extended Maturity October 2050	
Alpha Bank SA	XS1762980065	€ 0,50 billion	5.2.2018	5.2.2023 & Extended maturity 5.2.2024	
Alpha Bank SA	XS1733290750	€ 1.00 billion	6.12.2017	23.1.2021 & Extended maturity 23.1.2022	
Alpha Bank SA	XS1817841643	€ 1.00 billion	18.5.2018	23.10.2019 & Extended maturity 23.10.2020	
Piraeus Bank SA	XS1567737603	€ 1.00 billion	16.2.2017	18.11.2019 & Extended maturity November 2065	
Piraeus Bank SA	XS1706557458	€ 0,50 billion	31.10.2017	31.10.2022 & Extended maturity October 2068	
Piraeus Bank SA	XS1720736385	€ 1.00 billion	20.11.2017	20.5.2019 & Extended maturity May 2065	
Piraeus Bank SA	XS1760791340	€ 1.00 billion	31.1.2018	31.07.2019 & Extended maturity July 2065	

Piraeus Bank SA	XS1820078977	€ 1.00 billion	11.5.2018	11.2.2020 & Extended maturity February 2066	
Eurobank Ergasias S.A.	XS1709545641	€ 0,50 billion	2.11.2017	2.11.2020 & Extended Final Maturity 2.11.2050	
Eurobank Ergasias S.A.	XS0515809662	€ 0,72 billion	8.6.2010	20.7.2019 & Extended Final Maturity 20.7.2020	
Eurobank Ergasias S.A.	XS1410482951	€ 0,30 billion	16.5.2016	20.2.2020 & Extended Final Maturity 20.2.2021	
Eurobank Ergasias S.A.	XS1795267514	€ 0,15 billion	19.3.2018	20.3.2019 & Extended Final Maturity 20.3.2020	
Eurobank Ergasias S.A.	XS1855456106	€ 0,27 billion	11.7.2018	22.7.2019 & Extended Final Maturity 20.7.2020	
Eurobank Ergasias S.A.	XS1896804066	€ 0,50 billion	18.10.2018	20.10.2020 & Extended Final Maturity 20.10.2070	
Eurobank Ergasias S.A.	XS1900633212	€ 0,65 billion	16.11.2018	20.11.2019 & Extended Final Maturity 20.11.2069	
Eurobank Ergasias S.A.	XS1910934535	€ 0,65 billion	16.11.2018	20.01.2020 & Extended Final Maturity 20.1.2070	
Total		€ 13,69 billion			

II. Legal base

Title of relevant act	Applicable provision (quote the text)	Remarks (if needed)
Article 152 of Law 4261/2014	<p>1. Credit institutions may issue covered bonds in accordance with the provisions of this article and, on a supplementary basis, Articles 1-9, 12 and 14 of Law 3156/2003 (Government Gazette A157).</p> <p>2. The representative of bondholders shall be a trustee, which may be a credit institution or a credit institution's affiliate, as defined in Article 42e(5) of 196 Law 2190/1920 or Article 1 of Directive 83/349/EEC, that provides its services legally in the EEA. Unless otherwise specified under the conditions of the bond loan, the trustee shall be liable towards bondholders for wilful misconduct or grave negligence.</p>	

3. The cover pool may comprise claims arising from loans and credits of any nature and, on a supplementary basis, claims arising from financial derivatives (including, but not limited to, interest rate swaps), deposits with credit institutions and securities, as specified in a decision of the Bank of Greece. The same decision shall lay down the ratio of the value of the underlying assets to the value of the covered bonds upon issue, the manner of valuation of such assets, as well as the control ensuring the adequacy of the cover throughout the maturity of the bonds. A different ratio may be determined according to the type of assets in the cover pool, in particular the type of underlying loans or credits.

4. The cover shall be legally pledged to the bondholders and other creditors the claims of which are linked to the issue of the bonds (such as, indicatively, claims from financial derivatives linked to the bond issue, claims of the trustee to its agreed fees and expenses, claims of any guarantors, claims of any manager of the loans), and which are mentioned as secured lenders in the bond issue schedule. If any of the assets in the cover pool of the bonds are governed by foreign law, a security interest therein shall be created in favour of the bondholders and other secured creditors according to the provisions of the relevant foreign law. The schedule may provide that the same collateral secures bondholders and/or other creditors the claims of which are linked to bonds of a different issue or series, and may specify any relevant matter, such as, indicatively, the relationship between them, the manner and seniority of satisfaction, their organisation and representation by way of derogation from Articles 3 and 4 of Law 3156/2003, provided that foreign law is not chosen. More than one trustees may be appointed, whether joint or by series or by issue.

5. The claims included in the cover pool shall be listed in a document signed by the issuer and the trustee and registered in summary form that includes its substantial points, according to Article 3 of Law 2844/2000. Likewise, claims in the cover pool may be replaced with other claims, or further claims may be added to the cover pool.

6. Pledged claims shall be senior to the claims referred to in Article 975 of the Code of Civil Procedure, unless otherwise specified in the terms of the bond issue. In case of bankruptcy of the issuer, the bondholders and other creditors secured by the collateral shall be satisfied, for the part of their claims not paid by the cover, out of the remaining estate of the issuer, like unsecured creditors.

7. From the registration of the document referred to in para. 5 of this article onwards, the validity of the issue of the bond loan, of the mobilisation of collateral and of any security interest governed by foreign law, of the payments to the bondholders and other creditors secured by the collateral, as well as of the conclusion of any agreement relevant to the issue of the covered bonds shall not be affected by the initiation of insolvency proceedings, as defined in Law 3458/2006, against the issuer.

8. Attachment of the assets included in the cover pool shall be prohibited. Unless otherwise specified in the terms of the bond issue, any disposal there of by the issuer without the trustee's written consent shall be null and void.

9. The bond issue schedule may specify that either from the outset or upon occurrence of certain events, such as, indicatively, initiation of insolvency proceedings against the issuer, the trustee may assign or take up the collection and overall management of the assets in the cover pool by applying accordingly Article 10(14)-(16) of Law 3156/2003. The trustee may also, according to the conditions of the schedule and the terms of his relationship with the bondholders, sell and transfer assets in the cover pool either by applying accordingly Articles 10 and 14 of Law 3156/2003 on loan securitisation or by applying the general provisions, and use the net proceeds from the sale to pay the claims secured by the collateral, by way of derogation from Articles 1239 and 1254 of the Civil Code and any other contrary provision of law. For the implementation of the preceding sentence and by way of derogation from Article 10(2) of Law 3156/2003, the transferor need not have permanent establishment in Greece. In case of the issuer's insolvency, the Bank of Greece may appoint an administrator, regardless of the powers it may assign to a commissioner or liquidator under Articles 137 and 145 above, if the trustee does not do so. The proceeds from the collection of the pledged claims and the sale of the other assets subject thereto shall be applied towards the repayment of the bonds and the other claims secured by the collateral according to the terms of the bond issue. The provisions of Article 10(20)-(22) of Law 3156/2003 shall apply accordingly to the sale, transfer, collection and generally the management of assets in the cover pool.

10. Bonds issued by a special purpose vehicle based either in Greece or in an EEA Member State that acquires claims arising from loans and credits of any type from a credit institution based in Greece according to the provisions of Articles 10 and 14 of Law 3156/2003 on securitisation may be assimilated with covered bonds, provided that the credit institution guarantees irrevocably, being liable as self-debtor on first demand, without any limitation of amount, time or otherwise, the total of claims of bondholders and other creditors the claims of which are linked to the bond issue. In addition, in order for the bonds issued by the special purpose vehicle to be assimilated with covered bonds, the conditions of the decision of the Bank of Greece to be issued under para. 3 above in relation to the value of the bonds and the value and kind of assets of the special purpose vehicle must be fulfilled. The other paragraphs of this article shall also apply accordingly in this case.

11. The covered bonds may be listed on a regulated market within the meaning of Article 2(10) of Law 3606/2007 and Article 4(14) of Directive 199 2004/39/EC, as well as be sold by public offering according to the relevant provisions.

12. In case that a credit institution based in an EEA Member State issues under foreign law bonds classified according to that law as covered bonds, the issuer may pledge claims governed by Greek law to the bondholders and other creditors the claims of which are linked to the issue of the bonds by applying accordingly paras. 5, 6 and 8 of this article and Article 14 of Law 3156/2003.

13. Credit institutions may issue covered bonds according to the provisions of this paragraph, Article 14 of Law 3156/2003 and, accordingly, the other provisions of this article.

	<p>Covered bonds under this paragraph shall be secured through a guarantee provided by the legal representative of the special purpose vehicle based in Greece or another Member State of the EEA, which shall be liable irrevocably and unconditionally, at first demand and as self-debtor, without any limitation of amount, time or otherwise, for the total of bondholders' and other creditors' claims linked to the bond issue.</p> <p>The exclusive objective of the guarantor of covered bonds shall be to acquire claims and securities referred to in para. 3 above, as well as to provide a guarantee to secure claims of any nature according to the conditions of the covered bonds schedule.</p> <p>The acquisition of any kind of claims and securities sold, the management of any claims and securities and the collection of the claims of the special purpose vehicle shall be governed by the provisions of Article 10(2)(a) and (b), (6)-(17) and (20)-(22) of Law 3156/2003, applying accordingly. If the special purpose vehicle referred to in the preceding paragraph is based in Greece, it shall be a société anonyme governed by the provisions of Article 10(3), (4) and (5) of Law 3156/2003. Claims of any nature arising out of the guarantee of covered bonds shall be secured by the claims acquired by the guarantor of covered bonds, which shall be secured by the pledge. The pledged claims shall constitute the cover of 200 the covered bonds. The creation and operation of the pledge shall be governed by the provisions of Article 10(18) and (19) of Law 3156/2003. The cover may also include assets governed by foreign law according to the last sentence of para. 4 above.</p> <p>14. By decisions of the Bank of Greece, other bond categories may be assimilated with covered bonds, provided that the supervision of their issuers is ensured, the provisions of the preceding paragraphs applying accordingly. Decisions of the Bank of Greece may also specify the duties of the trustee, the covers of the bonds referred to in this article and other collaterals by way of derogation from the provisions of the preceding paragraphs, as well as details of the implementation of this article.</p> <p>(For a Greek version see: https://www.bankofgreece.gr/BoGDocuments/N.%204261_2014%20CRD%20IV.pdf)</p>	
<p>Bank of Greece Governor's Act 2620/28.8.2009</p>	<p>See: https://www.bankofgreece.gr/BogDocumentEn/GA.BG_2620-28.8.2007_Codification_of_Governors_Act_No.2598_2_November_2007_re_Supervisory_framework_for_covered_bonds_is.pdf</p> <p>For a Greek version see: https://www.bankofgreece.gr/Pages/el/Bank/LegalF/Acts.aspx</p>	

III. Contact points for up-to-date information

Name of institution/person responsible	Address e-mail address telephones	Link to a website
Hellenic Capital Market Commission/ Mrs. Anastasia Bitsakou	1, Kolokotroni & Stadiou Str., 105 62 Athens, Greece marketintermediaries@cmc. gov.gr tel.: +30 210 33 77 154 fax: +30 210 33 77 205	www.hcmc.gr

IV. Investment limit for instruments has been raised according to Article 52(4) of the UCITS Directive

YES X

NO

Legal base: According to article 61(4)(β) of Law 4099/2012, a mutual fund (UCITS) may invest no more than twenty five percent (25%) of its net asset value in bonds issued by a credit institution which has its registered office in a Member State and is subject by law to special public supervision designed to protect bond-holders.