

**UCITS authorized in another Member State
intending to market units/shares in Greece**





Επιτροπή Κεφαλαιαγοράς
Hellenic Capital Market Commission

1 Kolokotroni & Stadiou Str., 105 62 Athens, Greece

Tel.: (+30) 210 33 77 100

Fax: (+30) 210 33 77 205

<http://www.hcmc.gr>

E-mail: info@cmc.gov.gr

Directorate of Capital Market Intermediaries

Information on the relevant laws, regulations and administrative provisions which are specifically relevant to the arrangements made for the marketing of UCITS in Greece

According to Article 93 (1) of L. 4099/2012, the Hellenic Capital Market Commission (HCMC) is designated as the competent authority with responsibility for the authorization and supervision of UCITS.

According to Article 91 of Directive 2009/65/EC the Member States shall ensure that complete information on the laws, regulations and administrative provisions which do not fall within the field governed by this Directive and which are specifically relevant to the arrangements made for the marketing of units/shares of UCITS, established in another Member State within their territories, is easily accessible from a distance and by electronic means.

The definition of marketing of units/shares is provided for in Article 2 par. 3 of Decision of the Board of Directors of HCMC 16/633/20.12.2012:

“Marketing units/shares of UCITS” means any stage of the procedure of purchasing units/shares of UCITS, according to article 7 of L. 4099/2012. This procedure includes the communication, publicity, promotion and any other action (including provision of investment advice) aiming at the purchasing of units/shares of UCITS.

This document provides information regarding the marketing of UCITS in Greece in relation to the following categories

Contents

1.	Regulatory Framework	1
2.	Notification procedure of UCITS authorized in another Member State intending to market units/shares in Greece.....	2
3.	Updating the Notification file	3
4.	Fees payable to HCMC.....	3
5.	Advertising	4
6.	Functions and Facilities	5
6.1.	Paying Agent	6
6.2.	Distributor.....	6
7.	Termination of marketing in Greece.....	7
8.	Sanctions.....	8
ANNEX 1		i
ANNEX 2		v

1. Regulatory Framework

The Regulatory Framework applicable to Undertakings for collective investment that are governed by the law of another Member State of the European Economic Area and that fulfil the conditions set out in Directive 2009/65/EC, consists of:

- i. Law 4099/2012 (Government Gazette A'250/20.12.2012), *Undertakings for collective investment in transferable securities and mutual funds management companies* (Adaptation of Greek legislation to the Directive 2009/65/EC).
- ii. Commission Regulation (EU) 584/2010 of 1 July 2010 implementing Directive 2009/65/EC of the European Parliament and of the Council as regards the form and content of the standard notification letter and UCITS attestation, the use of electronic communication between competent authorities for the purpose of notification, and

- procedures for on-the-spot verifications and investigations and the exchange of information between competent authorities.
- iii. Commission Regulation (EU) 583/2010 of 1 July 2010 implementing Directive 2009/65/EC of the European Parliament and of the Council as regards key investor information and conditions to be met when providing key investor information or the prospectus in a durable medium other than paper or by means of a website.
 - iv. Regulation (EU) 2019/1156 of the European Parliament and of the Council of 20 June 2019 on facilitating cross-border distribution of collective investment undertakings and amending Regulations (EU) No 345/2013, (EU) No 346/2013 and (EU) No 1286/2014.
 - v. Law 4920/2022 (Government Gazette A'74/15.04.2022), Adaptation of Greek legislation, inter alia, to the Directive 2019/1160/EC of the European Parliament and of the Council of 20 June 2019 amending Directives 2009/65/EC and 2011/61/EU with regard to cross-border distribution of collective investment undertakings.
 - vi. Decision of the Board of Directors of HCMC 15/633/20.12.2012 (Government Gazette B'12/10.1.2013) *Organizational requirements for the operation of Management Companies, conflict of interest, conduct of business, risk management and particulars of the standard agreement between a depositary and a management company.*
 - vii. Decision of the Board of Directors of HCMC 16/633/20.12.2012 (Government Gazette B'12/10.1.2013), *UCITS mergers - Master feeder structure – Notification procedure of UCITS marketing their units in member states other than those in which they are established.*
 - viii. Decision of the Board of Directors of HCMC 1/756/18.5.2016 (Government Gazette B'1781/17.06.2016) *Διάθεση στην Ελλάδα μεριδίων/μετοχών ΟΣΕΚΑ άλλου κράτους μέλους σύμφωνα με το άρθρο 89 του ν.4099/2012.*
 - ix. Ministerial Decision 0000532/2016 (Government Gazette B'999/11.4.2016), *Determination of the Capital Market Commission resources.*

2. Notification procedure of UCITS authorized in another Member State intending to market units/shares in Greece

Regulatory provisions

Article 90 of L. 4099/2012.

Any UCITS authorized in another Member State intending to market units/shares in Greece must be previously notified to the HCMC by the competent authority of UCITS home member state.

Competent authorities of the UCITS home Member State shall transmit the complete documentation referred to in the first and the second subparagraph of Article 93(3) of Directive 2009/65/EC to the HCMC in case the UCITS intends to market its units/shares, by e-mail.

The complete documentation should contain the following:

1. The notification letter containing information about the proposed arrangements for marketing shares or units/shares in Greece, including details of each category of units/shares, where such is the case. The notification letter shall also include the details necessary, including the address, for the invoicing or for the communication of any applicable regulatory fees or charges by HCMC and information on the facilities for performing the tasks referred to in Article 89B para.1 of Law 4920/2022. The notification letter must be completed according to ANNEX 1.

2. The latest version of the Key Investor Information Document (KIID), translated under the responsibility of UCITS in Greek.
3. The latest version of the fund rules or instruments of incorporation, translated under the responsibility of UCITS in Greek or English depending on UCITS' choice.
4. The latest version of the prospectus, translated under the responsibility of UCITS in Greek or English depending on UCITS' choice.
5. The latest published annual report and any subsequent half-yearly report, translated under the responsibility of UCITS in Greek or English depending on UCITS' choice.
6. The attestation from the supervisory authority.
7. Proof that the HCMC filing fee has been paid.

In case the share classes are not registered as such, the UCITS should, nevertheless, specify in the notification letter which classes it intends to offer in Greece.

The HCMC informs the competent authority of the UCITS home member state within five business days whether the file is complete, and the UCITS may begin the marketing of its units/shares in Greece, or for any insufficiency of the file.

3. Updating the Notification file

Regulatory provisions

Article 90 par.6 of L.4099/2012 and Article 26 of Decision of the Board of Directors of HCMC 16/633/20.12.2012.

In the event of a change in the information included in the notification letter [supra par. 2.1], a UCITS shall give written notice thereof to the competent authorities of both the UCITS home Member State and to HCMC at least one month before implementing that change. If a UCITS intends to market a new share class in Greece, where it has already been notified for marketing, the UCITS should give written notice to the competent authorities of both the UCITS home Member State and to HCMC, at least one month before the marketing of the new share class starts.

Where, pursuant to a change as referred to in the first subparagraph, the UCITS would no longer comply with this Directive, the competent authorities of the UCITS home Member State shall inform the UCITS within 15 working days of receipt of all the information referred to in the first subparagraph that it is not to implement that change. In that case, the competent authorities of the UCITS home Member State shall notify the HCMC accordingly.

Where a change referred to in the first subparagraph is implemented after information has been transmitted in accordance with the second subparagraph and pursuant to that change the UCITS no longer complies with this Directive, the competent authorities of the home Member State of the UCITS shall take all appropriate measures in accordance with Article 98 of Directive 2009/65/EE, including, where necessary, the express prohibition of marketing of the UCITS and shall notify the HCMC without undue delay of the measures taken.

Any amendments should be addressed to the HCMC at the relevant for updated documents e-mail address: UCITS-update@cmc.gov.gr.

4. Fees payable to HCMC

Regulatory provisions

Articles 11 (3, 7) and 21 of the Ministerial Decision 0000532/2016 (Government Gazette B'999/11.4.2016).

UCITS authorized by the competent supervisory authority of another Member State, regarding their intention to market units/shares in Greece are subject to a set filing fee, as provided in Article 11 para 3 and Article 21 para 1 of the Ministerial Decision 0000532/2016. The amount per compartment or per UCITS with no compartments is €1,000.00 plus a 2.4% duty stamp. The fee is payable on the day the notification application is filed with the HCMC.

UCITS of which units/shares are marketed in Greece on June 30th of each year are subject to a set annual fee, as provided in Article 11 para 7.i and Article 21 para 1 of the Ministerial Decision 0000532/2016. The amount per compartment or per UCITS with no compartments is €1,000.00 plus a 2.4% duty stamp. The fee is payable in July of each year.

The Management Company of the UCITS is responsible for paying the above-mentioned fees to the HCMC. All fees should be deposited to the following HCMC bank account held at the Bank of Greece:

HELLENIC CAPITAL MARKET COMMISSION
1 Kolokotroni & Stadiou Str.
105 62 Athens
GREECE
SWIFT BIC: BNGRGRAA
IBAN: GR5901000240000000000262154

5. Advertising

Regulatory provisions

Articles 79, 89 of L. 4099/2012.

Article 46 of Decision of the Board of Directors of HCMC 15/633/20.12.2012.

Article 5 of Regulation 2019/1156

- a. A UCITS may be advertised in Greece provided that it complies with provisions of Article 79 relating to the advertising of UCITS [Article 89 (9)].
- b. All marketing communications to investors shall be clearly identifiable as such. They shall be fair, clear and not misleading. In particular, any marketing communication comprising an invitation to purchase units of UCITS that contains specific information about a UCITS shall make no statement that contradicts or diminishes the significance of the information contained in the prospectus and the key investor information referred to in Article 80. It shall indicate that a prospectus exists and that the key investor information referred to in Article 80 is available. It shall specify where and in which language such information or documents may be obtained by investors or potential investors or how they may obtain access to them.
- c. It is prohibited that the UCITS communicate directly (e.g. via telephone, electronic communications, fax etc.) with any investor who has declared their opposition to this kind of communication.
- d. Excluding the Key Investor Information Document (KIID), any other information or brochure of the UCITS should include a statement in capital letters at the bottom of the first and last page of a multi-page form that "*UCITS HAVE NO GUARANTEED RETURN AND PAST PERFORMANCE DOES NOT GUARANTEE THE FUTURE ONES*".
- e. All publications of the UCITS and the Management Company and any information or promotional material must be submitted, in the form available to investors, without delay to HCMC [Article 79 (4)].
- f. As provided by Article 79 (5), if requested by the HCMC, the Management Company is obliged to issue at its own expense clarifications or corrections to previous publications in case previous publications might prove misleading or misinforming to investors.

- g. Upon request of an investor, the management company shall also provide supplementary information relating to the quantitative limits that apply in the risk management of the UCITS, to the methods chosen to this end and to the recent evolution of the main risks and yields of the instrument categories.
- h. With respect to any reference to the UCITS performance the following shall apply:
 - i. The UCITS performance is calculated in accordance with Article 16 of Regulation (EU) 583/2010.
 - ii. UCITS may advertise the percentage yield of the last twelve months ending on the last day of the preceding calendar month, cumulative returns integer multiples of the year (two years, three years, etc.) and in addition, their performance for the period from 1st January of each year until the last day of the previous month from the date of issuance of the advertising form or notice.
 - iii. UCITS in operation for less than twelve months should not advertise their performance.
 - iv. UCITS which have changed category and UCITS whose investment objective and investment policy have undergone substantial changes should not advertise the cumulative performance for the period in which they were part of a different class or had a different investment objective and investment policy. These UCITS will still advertise their past annual returns, as provided for in Article 17 of Regulation (EU) 583/2010, labelling that these performances were achieved under different conditions which are no longer valid.
- i. The UCITS defines clearly and within the limits laid down in its rules or articles of incorporation the procurement policy the unit-holders are subject to. The UCITS in both the subscription and redemption forms indicates the exact commission rate with which the unit-holder is charged when subscribing or redeeming its units/shares.

6. Functions and Facilities

Regulatory provisions

Articles 7 and 89B of L. 4099/2012.

Article 2 of Decision of the Board of Directors of HCMC 1/756/18.5.2016.

1. Any UCITS authorized in another Member State intending to market units/shares in Greece shall make available facilities to perform the following tasks:
 - (a) process subscription, repurchase and redemption orders and make other payments to unit-holders relating to the units of the UCITS, in accordance with the conditions set out in the documents required pursuant to Chapter IX of directive 2009/65;
 - (b) provide investors with information on how orders referred to in point (a) can be made and how repurchase and redemption proceeds are paid;
 - (c) facilitate the handling of information and access to procedures and arrangements referred to in Article 15 of directive 2009/65 relating to the investors' exercise of their rights arising from their investment in the UCITS in Greece,
 - (d) make the information and documents required pursuant to Chapter IX of directive 2009/65 [as this is transposed in Articles 75-84 of L.4099/2012] available to investors under the conditions laid down in paragraphs 5 to 7 of Article 89 of L.4099/12, for the purposes of inspection and obtaining copies thereof;
 - (e) provide investors with information relevant to the tasks that the facilities perform in a durable medium; and
 - (f) act as a contact point for communicating with the HCMC.
2. Member States shall not require a UCITS to have a physical presence in Greece or to appoint a third party for the purposes of paragraph 1.
3. The UCITS shall ensure that the facilities to perform the tasks referred to in paragraph 1, including electronically, are provided:
 - (a) in greek or in english if the investor gives its consent;

(b) by the UCITS itself, by a third party which is subject to regulation and supervision governing the tasks to be performed, or by both.

For the purposes of point (b), where the tasks are to be performed by a third party, the appointment of that third party shall be evidenced by a written contract, which specifies which of the tasks referred to in paragraph 1 are not to be performed by the UCITS and that the third party will receive all the relevant information and documents from the UCITS.

The UCITS authorized in another Member State intending to market units/shares in Greece is recommended to appoint a Paying Agent and a Distributor that will be responsible for the marketing. Upon request of HCMC, the appointment shall be evidenced by written contract.

6.1. Paying Agent

The Paying Agent referred to in point 2 of Part B of the notification letter could be the intermediary responsible for providing the financial services of a UCITS. The Paying Agent is a credit institution domiciled either in Greece or in another country with a branch located in Greece. The Paying Agent is responsible for fulfilling the monetary elements of the subscription and redemption orders and other transactions that are a necessary complement to the marketing activities. In particular, the Paying Agent, if appointed, may provide at least the following financial services:

1. receiving the cash equivalent funds for subscriptions and making payments for redemptions,
2. making coupon and dividend payments, and
3. dealing with any settlement differences arising when switching between compartments.

A UCITS may appoint more than one Paying Agents.

6.2. Distributor

The Distributors referred to in point 2 of Part B of the notification letter could be the intermediary responsible for providing the marketing services. According to Article 7 (4) of L. 4099/2012, Distributors may take the form of a credit institution, management company, insurance company or investment firm. The aforementioned entities are domiciled either in Greece or in another country with a branch located in Greece. A Distributor may provide at least the following services:

1. processing subscription forms according to Article 7 of L. 4099/2012 and redemption forms to the Paying Agent. It is clarified that the procedure of processing subscription requests laid down in Article 7 of L. 4099/2012 applies also in the case of marketing in Greece of foreign UCITS under the passport regime of Directive 2009/65/EC.
2. supplying at least the following information to unit-holders:
 - i. the latest version of the Key Investor Information Document (KIID), translated in the Greek language,
 - ii. the latest version of the fund rules or instruments of incorporation, translated, in Greek or English
 - iii. the latest version of the prospectus, translated, in Greek or English
 - iv. the latest published annual report and any subsequent semi-annual report, translated, in Greek or English
 - v. the Net Asset Value (NAV) of the UCITS or the net asset value of compartments and share classes marketed in Greece. This information may be provided on a website.

Distributors must provide the necessary information to investors on a durable medium before the latter make their intended subscription.

The Management Company reports to the HCMC the statistical data of the UCITS marketed in Greece, as it is displayed in Annex 2. In particular, the Management Company provides information regarding the Management Company, the potential Distributor of UCITS in Greece, the UCITS, the Compartment, ISIN of the Share Class, the number of Greek unit-holders, the number of outstanding Units/Shares that Distributor's clients hold, their Net Asset Value (NAV) and the NAV publication link. The above data will be submitted to the e-mail address info@cmc.gov.gr within the first 10 business days of each calendar quarter and will refer to the data of the last day of the previous calendar quarter.

A UCITS may appoint more than one Distributors.

7. Termination of marketing in Greece

Regulatory provisions

Article 91A of Law 4099/2012

Article 3 of Decision of the Board of Directors of HCMC 1/756/18.05.2016.

1. A UCITS may de-notify arrangements made for marketing as regards units, including, where relevant, in respect of share classes, in Greece in respect of which it has made a notification in accordance with Article 90 of Law 4099, where all the following conditions are fulfilled:

- (a) a blanket offer is made to repurchase or redeem, free of any charges or deductions, all such units held by investors in Greece, is publicly available for at least 30 working days, and is addressed, directly or through financial intermediaries, individually to all investors in Greece whose identity is known;
- (b) the intention to terminate arrangements made for marketing such units in Greece is made public by means of a publicly available medium, including by electronic means, which is customary for marketing UCITS and suitable for a typical UCITS investor;
- (c) any contractual arrangements with financial intermediaries or delegates are modified or terminated with effect from the date of de-notification in order to prevent any new or further, direct or indirect, offering or placement of the units identified in the notification referred to in paragraph 2.

The information referred to in points (a) and (b) of the first subparagraph shall clearly describe the consequences for investors if they do not accept the offer to redeem or repurchase their units.

The information referred to in points (a) and (b) of the first subparagraph shall be provided in Greek or in English. As of the date referred to in point (c) of the first subparagraph, the UCITS shall cease any new or further, direct or indirect, offering or placement of its units which were the subject of de-notification in Greece.

2. The UCITS shall submit a notification to the competent authorities of its home Member State containing the information referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1.

3. The competent authorities of the UCITS home Member State shall verify whether the notification submitted by the UCITS in accordance with paragraph 2 is complete. The competent authorities of the UCITS home Member State shall, no later than 15 working days from the receipt of a complete notification, transmit that notification to HCMC and to ESMA.

Upon transmission of the notification pursuant to the first subparagraph, the competent authorities of the UCITS home Member State shall promptly notify the UCITS of that transmission.

4. The UCITS shall provide investors who remain invested in the UCITS as well as the competent authorities of the UCITS home Member State with the information required under Articles 75 to 84 and under Article 89 and 90 of Law 4099/2012.

5. The competent authorities of the UCITS home Member State shall transmit to HCMC information on any changes to the documents referred to in Article 90(1) of Law 4099/12.

6. HCMC shall have the rights and obligations set out in Article 35(2), Article 93(1) and Article 100 of Law 4099/12. Without prejudice to other monitoring activities and supervisory powers as referred to in Article 35(2) and Article 93, as from the date of transmission under paragraph 5 of this Article, HCMC shall not require the UCITS concerned to demonstrate compliance with national laws, regulations and administrative provisions governing marketing requirements referred to in Article 5 of Regulation (EU) 2019/1156 of the European Parliament and of the Council.

7. The use of any electronic or other distance communication means for the purposes of paragraph 4 is allowed, provided that the information and communication means are available for investors in Greek or, if the investor gives its consent, in English.

8. Sanctions

Regulatory provisions

Articles 93 (1) and 100 of L. 4099/2012.

Articles 11 (3, 7) and 21 of the Ministerial Decision 0000532/2016 (Government Gazette B'999/11.4.2016).

According to Article 93 (1) of L. 4099/2012, the HCMC is the competent authority for the supervision of any regulatory provisions concerning the marketing in Greece of units/shares of UCITS or UCI authorized in another country.

According to Article 100 of L. 4099/2012, the HCMC has the authority to take measures against UCITS authorized in another Member State and marketing their units/shares in Greece in case they violate the regulatory provisions set out in Articles 89 - 92 of L. 4099/2012 and Articles 11 and 21 of the Ministerial Decision 0000532/2016.

The HCMC immediately notifies the competent authority of home Member State of the UCITS Management Company about any suspension of issuing, redemption or any other sanction imposed on the Management Company.

ANNEX 1

NOTIFICATION LETTER

(Article 1 of Commission Regulation (EU) No 584/2010 of 1 July 2010 implementing Directive 2009/65/EC of the European Parliament and of the Council as regards the form and content of the standard notification letter and UCITS attestation, the use of electronic communication between competent authorities for the purpose of notification, and procedures for on-the-spot verifications and investigations and the exchange of information between competent authorities (OJ L 176, 10.7.2010, p. 16)

NOTIFICATION OF INTENTION TO MARKET UNITS OF UCITS

IN _____ (the host Member State)

Are you notifying amendments to information already provided in an initial notification?

Yes ☐ No ☐

PART A

Information on the UCITS

Name of the UCITS: _____

UCITS home Member State: _____

Legal form of the UCITS (please tick appropriate one box):

- ☐ common fund
☐ unit trust
☐ investment company

Does the UCITS have compartments? Yes/No

Name of the UCITS and/or compartment(s) to be marketed in Greece	LEI of the UCITS or of the compartment (2)	Name of share class(es) to be marketed in Greece (1)	ISIN of share class(es) to be marketed in Greece	Duration (2)	National identification code of the UCITS or of the compartment(s)

(1) If the UCITS intends to market only certain share classes, it should list only those classes

(2) If applicable

Information on the UCITS management company or self-managed UCITS

Name of the management company/self-managed investment company: _____

Management company LEI (if available): _____

National identification code of the management company (if available): _____

Management company's home Member State: _____

Address and registered office/domicile if different from address

Details of management company's website: _____

Details of contact person at the management company

Name/Position: _____

Telephone number: _____

E-mail address: _____

Details of the contact point (if a third party is appointed):

Name: _____

Legal form: _____

Registered office: _____

Name of the person to be contacted/Position: _____

Address for correspondence (if different): _____

Telephone number: _____

Email address: _____

Contact point for the transmission of the invoice or for the communication of any applicable regulatory fee or charges (if different)¹:

Name/Position: _____

Address for correspondence: _____

Telephone number: _____

Email address: _____

Duration of the company, if applicable: _____

Scope of activities of the management company in Greece:

Additional information about the UCITS management company or self-managed UCITS (if necessary):

Facilities to investors

¹ Please indicate a single contact point for the transmission of the invoice or for the communication of any applicable regulatory fee or charge referred to in Article 9 of Regulation (EU) 2019/1156 and in Article 2 of the Commission Implementing Regulation (EU) 2021/955.

In accordance with Article 93(1) of Directive 2009/65/EC, please fill-in the following table to provide information on the facilities to perform the tasks referred to in Article 89B (1) of Law 4920/2022:

Tasks	Information on the facilities performing the tasks	Name/legal form/registered office/ address, e-mail and telephone number for correspondence of the person responsible to provide the facilities
Process subscriptions, repurchase and redemption orders and make other payments to unit-holders relating to the units of the UCITS		
Provide investors with information on how orders can be made and how repurchase and redemption proceeds are paid		
Facilitate the handling of information and access to procedures and arrangements referred to in Article 15 of Directive 2009/65/EC relating to investors' exercise of their rights		
Make the information and documents required pursuant to Chapter IX of Directive 2009/65/EC available to investors		
Provide investors with information relevant to the tasks that the facilities perform in a durable medium		

Attachments

(1) The latest version of the fund rules or instruments of incorporation, translated if necessary in accordance with Article 94(1)(c) of Directive 2009/65/EC/89b para.3 (a) of Law 4920/22.

(Title of document or name of electronic file attachment)

(2) The latest version of the prospectus, translated if necessary in accordance with Article 94(1)(c) of Directive 2009/65/EC/89b para.3 (a) of Law 4920/22.

(Title of document or name of electronic file attachment)

(3) The latest version of the key investor information, translated if necessary in accordance with Article 94(1)(b) of Directive 2009/65/EC [89b para.3 (a) of Law 4920/22].

(Title of document or name of electronic file attachment)

(4) The latest published annual report and any subsequent half-yearly report, translated if necessary in accordance with Article 94(1)(c) of Directive 2009/65/EC [89b para.3 (a) of Law 4920/22].

(Title of document or name of electronic file attachment)

Note:

The latest versions of the required documents listed above must be attached to this letter for onward transmission by the competent authorities of the UCITS home Member State, even if copies have previously been provided to that authority. If any of the documents have previously been sent to HCMC and remain valid, the notification letter may refer to that fact.

Indicate where the latest electronic copies of the attachments can be obtained in future:

PART B

The following information is provided in conformity with the national laws and regulations of Greece in relation to the marketing of units of UCITS in that Member State.

UCITS shall refer to the website of the competent authorities of each Member State for details of which items of information shall be provided in this section and for complete and up to date information on the national laws, regulations and administrative provisions governing marketing requirements. A list of relevant website addresses is available at www.esma.europa.eu.

1. Arrangements made for marketing of units of UCITS

Units of the UCITS/UCITS compartments will be marketed by:

- | | |
|--------------------------|--|
| <input type="checkbox"/> | the management company that manages the UCITS |
| <input type="checkbox"/> | any other management company authorised under Directive 2009/65/EC |
| <input type="checkbox"/> | credit institutions |
| <input type="checkbox"/> | authorised investment firms or advisers |
| <input type="checkbox"/> | other bodies |

(1) _____

(2) _____

(3) _____

2. Other information required by HCMC in accordance with Article 5(1) of Regulation (EU) 2019/1156

Include:

- ☐ details of any additional information to be disclosed to unit-holders or their agents;
- ☐ in case a UCITS makes use of any exemptions from rules or requirements applicable in Greece in relation to marketing arrangements for the UCITS, a specific share class or any category of investors, details of the use made of such exemptions;

3. Evidence of payment due to HCMC.

PART C

Confirmation by the UCITS

We hereby confirm that the documents attached to this notification letter contain all relevant information as provided for in the Directive 2009/65/EC and Law 4920/2022. The text of each document is the same as that previously submitted to the competent authorities of the home Member State, or is a translation that faithfully reflects that text.

(The notification letter shall be signed by an authorised signatory of the UCITS or a third person empowered by a written mandate to act on behalf of the notifying UCITS, in a manner which the competent authorities of the UCITS home Member State accept for certification of documents. The signatory shall state his/her full name and capacity, and shall ensure the confirmation is dated.)

ANNEX 2

[illegible]