

No.F09222/806

HELLENIC REPUBLIC
HELLENIC CAPITAL MARKET COMMISSION
LEGAL ENTITY IN PUBLIC LAW

DECISION

7/452/1 Nov 2007

of the Board of Directors

Re: Transaction reporting and data recording obligations

THE BOARD OF DIRECTORS OF
THE HELLENIC CAPITAL MARKET COMMISSION

Having regard to:

1. Article 40 and article 59, paragraph 6, of Law 3606/2007;
2. Commission Regulation (EC) 1287/2006 (L241/2 Sep 2006);
3. Article 13, paragraph 2, of Law 2166/1993 (Government Gazette-GG A/137);
4. Article 90 of presidential decree 63/2005 on the codification of legislation on Government and governmental bodies (GG A/98/2005).
5. The fact that no expenditure is incurred by the State Budget due to the provisions hereof.

HAS UNANIMOUSLY DECIDED

Article 1

Method and content of reports

1. AEPEYs and credit institutions based in Greece, as well as investment firms and credit institutions operating branches in Greece and carrying out transactions in financial instruments admitted to trading on a regulated market (hereinafter collectively referred to as “parties liable to report transactions”) shall report such transactions to the Capital Market Commission in electronic form, through the Transactions Reporting System (TRS) for the collection, storage and processing of transactions reports and for the exchange of transaction reports with the supervising authorities of

other EU Member States. The branches of investment firms and credit institutions operating in Greece may, instead of reporting their transactions in Greece to the Capital Market Commission, report them to the competent supervising authority of their home Member State.

2. Transactions shall be reported in the form of an xml file, created pursuant to the specifications posted in the Capital Market Commission website. Any changes to the specifications shall be posted in the Capital Market Commission website and shall enter into force fourteen days after posting.

3. Transactions reports shall comprise the information set out in Annex A.

Article 2

Waiver of the reporting obligation

Parties liable to report transactions may waive their obligation to report their transactions to the Capital Market Commission where”

- (a) transactions are notified (i) by the regulated market or the MTF under the systems of which the transaction was made, or (ii) by a correspondence or reference system approved by the Capital Market Commission;
- (b) such parties have previously made a relevant statement to the Capital Market Commission.

Article 3

Transitional provision

1. Transactions in financial instruments that are not codified pursuant to ISO6166 shall be reported in writing or using the Table in Annex B until their codification is notified by the Capital Market Commission. On entry into force of the new specifications (codification under ISO6166 or other alternative codification), transactions shall be reported again in xml files using the TRS pursuant to article 1.

2. Parties liable to report transactions may, for two (2) months of the entry hereof into force, report their transactions in financial instruments

already codified under ISO6166 in writing, using the Table in Annex B. On completion of the implementation of infrastructure required for the interface of their systems with the TRS, parties liable to report transactions shall report them again to the Capital Market Commission in xml files, using the TRS pursuant to article 1.

3. Parties liable to report transactions carried out on regulated markets or the MTF managed by “Athens Exchange SA” or the Electronic Secondary Securities Market (HDAT) shall be considered to have fulfilled their reporting obligations if their transactions are reported to the Capital Market Commission by the regulated markets or the MTF managed by “Athens Exchange SA” or HDAT, unless they notify otherwise the Capital Market Commission in writing.

Article 4

Entry into force

1. This decision shall enter into force on the date it was made.
2. No expenditure is incurred by the State Budget due to the provisions hereof.
3. The present shall be published in the Government Gazette (Issue B).

The Secretary

The President	The 1st Vice-President	The 2nd Vice-President
Alexios A. Pilavios	Giangos Haralambous	Anastasios Th. Gavriilidis

The Members

True copy

Signature

Seraphim Varvaris

Administrative & Financial Services Director

Seal: Hellenic Republic, Hellenic Capital Market Commission, Legal Entity
in Public Law

ANNEX A**TRANSACTIONS:**

Field Identifier	Field description
Reporting firm identification	Investment firm's ISO 9362 – Bank Identifier Code (BIC)
Trading day	ISO 8601 Extended Date Format; YYYY-MM-DD
Trading time – Trading time	Trading time HH24:MI:SS
Trading time – Time identifier	ISO 8601 Time Zone Offset Format; SHH 12h, where S is the sign (+ or -) and HH the number of hours
Buy/Sell Indicator	B = Buy, S = Sell
Trading capacity	P = Principal, Own Account A = Agent, Customer/Client Account
Instrument identification	ISO 6166 – International Securities Identification Number (ISIN)
Unit price – price currency	The price of transaction excluding commission and accrued interest. A maximum of 19 digits (5 of them can be decimals)
Unit price – Price percentage	The price of transaction, when expressed as a percentage, excluding commission and accrued interest. A maximum of 19 digits (5 of them can be decimals)
Price notation	ISO 4217 - Currency Code; format: 3 alpha
Quantity	The number of units of the financial instruments or the nominal value of bonds. A maximum of 19 digits (5 of them can be decimals)
Counterparty – BC	ISO Bank Identifier Code (BIC) in case of investment firm
Counterparty – MIC	ISO 10383 - Market Identifier Code (MIC) in case of trading area
Counterparty – Internal	Internal code of the counterparty – 40(x)
Client – BIC	ISO 9362 – Bank Identifier Code (BIC) in case of investment firm
Client – Internal	Internal code of the client – 40(x)
Trading venue code – BIC	ISO 9362 – Bank Identifier Code (BIC) in case of systematic internaliser
Trading venue code – MIC	Market Identifier Code (MIC) in case of regulated market or multilateral trading facility
Trading venue code – XOFF	XOFF for Off the market

Transaction reference number	A unique identification number for the transaction provided by the investment firm or a third party reporting on its behalf – 40(x)
------------------------------	---

CANCELLATIONS:

Field Identifier	Field description
Reporting firm identification	Investment firm's ISO 9362 – Bank Identifier Code (BIC)
Trading day	ISO 8601 Extended Date Format; YYYY-MM-DD
Cancelled transaction reference number	Cancelled transaction reference number – 40(x)
Cancelled transaction flag	Reason for cancellation: C (cancelled by investment firm), D (cancelled by the HCMC)

ANNEX B

Field Identifier	Field description
Reporting firm identification	A unique code to identify the firm which executed the transaction
Trading day	The trading day on which the transaction was executed
Trading time	The time at which the transaction was executed, reported in the local time of the competent authority to which the transaction will be reported, and the basis in which the transaction is reported expressed as Coordinated Universal Time (UTC) +/- hours
Buy/sell indicator	Identifies whether the transaction was a buy or sell from the perspective of the reporting investment firm or, in the case of a report to a client, of the client
Trading capacity	Identifies whether the firm executed the transaction: — on its own account (either on its own behalf or on behalf of a client), — for the account, and on behalf, of a client
Instrument identification	This shall consist of: — a unique code, to be decided by the competent authority (if any) to which the report is made identifying the financial instrument which is the subject of the transaction, — if the financial instrument in question does not have a unique identification code, the report must include the name of the instrument or, in the case of a derivative contract, the characteristics of the contract
Instrument code type	The code type used to report the instrument.
Underlying instrument identification	The instrument identification applicable to the security that is the underlying asset in a derivative contract as well as the transferable security falling within Article 4(1)(18)(c) of Directive 2004/39/EC.
Underlying instrument identification code type	The code type used to report the underlying instrument.
Instrument type	The harmonised classification of the financial instrument that is the subject of the

	transaction. The description must at least indicate whether the instrument belongs to one of the top level categories as provided by a uniform internationally accepted standard for financial instrument classification.
Maturity date	The maturity date of a bond or other form of securitised debt, or the exercise date/maturity date of a derivative contract.
Derivative type	The harmonised description of the derivative type should be done according to one of the top level categories as provided by a uniform internationally accepted standard for financial instrument classification.
Put/call	Specification whether an option or any other financial instrument is a put or a call.
Strike price	The strike price of an option or other financial instrument.
Price multiplier	The number of units of the financial instrument in question which are contained in a trading lot; for example, the number of derivatives or securities represented by one contract.
Unit price	The price per security or derivative contract excluding commission and (where relevant) accrued interest. In the case of a debt instrument, the price may be expressed either in terms of currency or as a percentage.
Price notation	The currency in which the price is expressed. If, in the case of a bond or other form of securitised debt, the price is expressed as a percentage, that percentage shall be included.
Quantity	The number of units of the financial instruments, the nominal value of bonds, or the number of derivative contracts included in the transaction.
Quantity notation	An indication as to whether the quantity is the number of units of financial instruments, the nominal value of bonds or the number of derivative contracts.
Counterparty	Identification of the counterparty to the transaction. That identification shall consist of:

	<p>— where the counterparty is an investment firm, a unique code for that firm, to be determined by the competent authority (if any) to which the report is made,</p> <p>— where the counterparty is a regulated market or MTF or an entity acting as its central counterparty, the unique harmonised identification code for that market, MTF or entity acting as central counterparty, as specified in the list published by the competent authority of the home Member State of that entity in accordance with Article 13(2),</p> <p>— where the counterparty is not an investment firm, a regulated market, an MTF or an entity acting as central counterparty, it should be identified as ‘customer/client’ of the investment firm which executed the transaction.</p>
Venue identification	<p>Identification of the venue where the transaction was executed. That identification shall consist in:</p> <p>— where the venue is a trading venue: its unique harmonized identification code,</p> <p>— otherwise: the code ‘OTC’.</p>
Transaction reference number	A unique identification number for the transaction provided by the investment firm or a third party reporting on its behalf.
Cancellation flag	An indication as to whether the transaction was cancelled.
Client identification	A unique code identifying the client on behalf of whom the transaction was made

Athens, March 2009
True translation from Greek
The translator Eleni Dimitriou