

### **Retail Client**

### **Equities - Execution Venues**

Class of Instrument	Equities - Shares & Depositary Rece	ipts/Tick size liquidity bands 5	and 6 (from 2.000 t	trades per day)	
Notification if < 1 average trade per business day in the previous year	NO	,	, , , , , , , , , , , , , , , , , , , ,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders		Percentage of directed orders
Athens Exchange Securities' Market - XATH	100%	100%	47,25%	47,98%	100%
Class of Instrument	Equities - Shares & Depositary Rece	ipts/Tick size liquidity bands 3	and 4 (from 80 to 1	,999 trades per o	day)
Notification if < 1 average trade per business day in the previous year	NO				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	_	Percentage of directed orders
Athens Exchange Securities' Market - XATH	99,27%	97,34%	46,59%	46,36%	100%
Athens Exchange Alternative Market - ENAX	0,73%	2,66%	0,64%	0,68%	100%
Class of Instrument	Equities — Shares & Depositary Rec	eipts/Tick size liquidity bands	L and 2 (from 0 to 7	79 trades per day	)
Notification if < 1 average trade per business day in the previous year	NO				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Athens Exchange Securities' Market - XATH	92,70%	91,49%	34,39%	38,05%	100%
Athens Exchange Alternative Market - ENAX	6,35%	7,96%	4,95%	5,37%	100%
Cyprus Stock Exchange's Emerging Companies Market - XECM	0,57%	0,30%	N/A	N/A	100%
Cyprus Stock Exchange - XCYS	0,37%	0,26%	N/A	N/A	100%

# **Equities - Counterparties**

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Class of Instrument	Equities - Shares and Depositary Re-	ceipts			
Notification if < 1 average trade per business day in the previous year	NO				
First five counterparties for receiving and transmitting orders in terms of	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed
transaction volumes (in descending order)	percentage of total in that class	executed as percentage of	passive orders	aggressive	orders
		total in that class		orders	
Instinet - 213800MXAKR2LA1VBM44	86,51%	86,53%	N/A	N/A	100%
Cowen - 213800SS94VGJTFLIG64	10,09%	11,59%	N/A	N/A	100%
UBS - 5299007QVIQ7I064NX37	2,86%	1,31%	N/A	N/A	100%
Tourmaline - 213800MWJ1TXNQIF5J22	0,54%	0,55%	N/A	N/A	100%
CM CIC Market Solutions - N4JDFKKH2FTD8RKFXO39	0,00%	0,02%	N/A	N/A	100%

## **Debt Instruments**

Class of Instrument	Debt securities - Bonds				
Notification if < 1 average trade per business day in the previous year	NO				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	_	Percentage of directed orders
Optima bank S.A 2138008NSD1X1XFUK750	80,84%	15,81%	N/A	N/A	100%
Athens Exchange Securities' Market - XATH	19,15%	84,12%	53,02%	46,12%	100%
Athens Exchange Alternative Market - ENAX	0,00%	0,07%	0,07%	0,07%	100%
Class of Instrument	Debt securities - Bonds				
Notification if < 1 average trade per business day in the previous year	YES				
First five counterparties for receiving and transmitting orders in terms of	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed
transaction volumes (in descending order)	percentage of total in that class	executed as percentage of total in that class	passive orders	aggressive orders	orders
UBS - 5299007QVIQ7I064NX37	100,00%	100,00%	N/A	N/A	100%
Class of Instrument	Debt securities - Money markets ins	truments			
Notification if < 1 average trade per business day in the previous year	YES				
Top five execution venues ranked in terms of trading volumes (in	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed
descending order)	percentage of total in that class	executed as percentage of total in that class	passive orders	aggressive orders	orders
Optima bank S.A 2138008NSD1X1XFUK750	100%	100%	N/A	N/A	100%

# Currency derivatives

currency derivatives						
Class of Instrument	Currency derivatives - Futures and options admitted to trading at a trading venue					
Notification if < 1 average trade per business day in the previous year	YES					
First five counterparties for receiving and transmitting orders in terms of	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed	
transaction volumes (in descending order)	percentage of total in that class	executed as percentage of	passive orders	aggressive	orders	
		total in that class		orders		
MAREX FINANCIAL- 5493003EETVWYSIJ5A20	100%	100%	N/A	N/A	100%	

# **Structured Financial Instruments**

Class of Instrument	Structured Financial Instruments				
Notification if < 1 average trade per business day in the previous year	YES				
•	percentage of total in that class	·	passive orders		Percentage of directed orders
Optima bank S.A 2138008NSD1X1XFUK750	100%	100%	N/A	N/A	100%

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Class of Instrument	Structured Financial Instruments				
Notification if < 1 average trade per business day in the previous year	YES				
First five counterparties for receiving and transmitting orders in terms of	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed
transaction volumes (in descending order)	percentage of total in that class	executed as percentage of	passive orders	aggressive	orders
		total in that class		orders	
UBS - 5299007QVIQ7IO64NX37	100%	100%	N/A	N/A	100%

### **Equity derivatives**

Class of Instrument	Equity derivatives/Futures and options admitted to trading on a trading venue					
Notification if < 1 average trade per business day in the previous year	NO					
Top five execution venues ranked in terms of trading volumes (in	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed	
descending order)	percentage of total in that class	executed as percentage of	passive orders	aggressive	orders	
		total in that class		orders		
Athens Exchange Derivatives Market - XADE	100%	100%	N/A	N/A	100%	
Class of Instrument	Equity derivatives/Futures and option	ons admitted to trading on a tra	ading venue			
Notification if < 1 average trade per business day in the previous year	NO					
First five counterparties for receiving and transmitting orders in terms of	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed	
transaction volumes (in descending order)	percentage of total in that class	executed as percentage of	passive orders	aggressive	orders	
		total in that class		orders		
MAREX FINANCIAL- 5493003EETVWYSIJ5A20	100%	100%	N/A	N/A	100%	

#### Commodities derivatives and emission allowances derivatives

Class of Instrument	Commodities derivatives and emission allowances derivatives/Options and Futures admitted to trading on a trading venue					
Notification if < 1 average trade per business day in the previous year	YES					
First five counterparties for receiving and transmitting orders in terms of	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed	
transaction volumes (in descending order)	percentage of total in that class	executed as percentage of	passive orders	aggressive	orders	
		total in that class		orders		
MAREX FINANCIAL- 5493003EETVWYSIJ5A20	100%	100%	N/A	N/A	100%	

#### Exchange traded products (exchange traded funds)

Exchange traded products (exchange traded funds)						
Class of Instrument	Exchange traded products (exchange traded funds)					
Notification if < 1 average trade per business day in the previous year	YES					
Top five execution venues ranked in terms of trading volumes (in	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed	
descending order)	percentage of total in that class	executed as percentage of	passive orders	aggressive	orders	
		total in that class		orders		
Athens Exchange Securities' Market - XATH	100%	100%	39,13%	60,87%	100%	
Class of Instrument	Exchange traded products (exchang	e traded funds)				
Notification if < 1 average trade per business day in the previous year	NO					
First five counterparties for receiving and transmitting orders in terms of	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed	
transaction volumes (in descending order)	percentage of total in that class	executed as percentage of	passive orders	aggressive	orders	
		total in that class		orders		
Instinet - 213800MXAKR2LA1VBM44	87,92%	89,66%	N/A	N/A	100%	
Cowen - 213800SS94VGJTFLIG64	12,08%	10,34%	N/A	N/A	100%	

# Other Financial Instruments

Other Financial Instruments				
YES				
Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed
percentage of total in that class	executed as percentage of	passive orders	aggressive	orders
	total in that class		orders	
100%	100%	N/A	N/A	100%
	YES  Proportion of volume traded as a percentage of total in that class	Proportion of volume traded as a percentage of total in that class  Proportion of orders executed as percentage of total in that class	YES  Proportion of volume traded as a proportion of orders percentage of executed as percentage of total in that class total in that class	YES  Proportion of volume traded as a Proportion of orders percentage of total in that class executed as percentage of passive orders aggressive orders

Class of Instrument	Other Financial Instruments				
Notification if < 1 average trade per business day in the previous year	YES				
First five counterparties for receiving and transmitting orders in terms of	Proportion of volume traded as a	Proportion of orders	Percentage of	Percentage of	Percentage of directed
transaction volumes (in descending order)	percentage of total in that class	executed as percentage of	passive orders	aggressive	orders
		total in that class		orders	
UBS - 5299007QVIQ7I064NX37	100,00%	100,00%	N/A	N/A	100%

Pursuant to the delegated Regulation (EU) 2017/576, the Bank is required to make public, on an annual basis, the top five execution venues and the top five counterparties for the transmission of orders to be executed in terms of trading volumes (in descending order), for all its executed client orders, by class of financial instrument and by client categorisation, as specified in Annex II of this Regulation. The Bank selects both execution venues and counterparties and monitors the execution quality for each class of financial instrument, based on the Order Execution Policy and its associated procedures. Any cases of conflict of interest are identified and evaluated by the Bank. The Bank does not receive any remuneration, discount or non-monetary benefit for routing clients' orders to a particular trading venue or execution venue. The Bank has no close links, conflicts of interest and joint ownership with anyone of the execution venues or counterparties used to execute the orders. A detailed description of the above is included in the MiFID II Pre-contractual information.

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