2021 ANNUAL FINANCIAL REPORT

For the period from January 1st, 2021 until December 31st, 2021

In accordance with the International Financial Reporting Standards

ATHENS EXCHANGE CLEARING HOUSE S.A.
110 Athinon Avenue
Postal Code: 10442
General Electronic Commercial Registry:6410501000
Tel.: +30 2103366800

TABLE OF CONTENTS

1. DECLARATIONS BY MEMBERS OF THE BOARD OF DIRECTORS

WE DECLARE THAT

1. To the best of our knowledge, the accompanying annual Financial Statements, prepared in accordance with the applicable International Financial Reporting Standards, present truly the assets and liabilities, the equity as at 31/12/2021 and the profit and loss for the financial Year 2021 of "ATHENS EXCHANGE CLEARING HOUSE S.A."
2. To the best of our knowledge, the accompanying report of the Board of Directors for the financial year 2021 presents truly the development, performance and position of "ATHENS EXCHANGE CLEARING HOUSE S.A.", together with a description of the principal risks and uncertainties that the Company faces.
3. To the best of our knowledge, the accompanying Financial Statements are those approved by the Board of Directors of "ATHENS EXCHANGE CLEARING HOUSE S.A." on 28/03/2022.

Athens, 28 March 2022

THE CHAIRMAN OF THE BoD	THE CHIEF EXECUTIVE OFFICER	THE MEMBER OF THE BoD
GEORGE HANDJINICOLAOU **ID: X-501829**	**YIANOS KONTOPOULOS** **ID: AA-246553**	**GIORGOS DOUKIDIS** **ID: X-468731**

2. MANAGEMENT REPORT OF THE BOARD OF DIRECTORS

OF "ATHENS EXCHANGE CLEARING HOUSE S.A."

FOR THE FINANCIAL YEAR FROM 1 JANUARY TO 31 DECEMBER 2021

The Board of Directors of ATHENS EXCHANGE CLEARING HOUSE S.A. (ATHEXClear or the Company) presents its Report with regard to the financial statements for the financial year 2021.

The financial statements have been prepared in accordance with the International Financial Reporting Standards adopted by the European Union.

THE GREEK STOCK MARKET

The Athens Exchange General Index closed on 31/12/2021 at 893.34 points, increased by 10.4% from the 808.99 points at the end of 2020. The average market capitalization came to €61.1 billion, recording an increase of 28.6% compared to 2020 (€47.5 billion).

The total traded value in 2021 (€17.8 billion) shows a 9.9% increase compared to the same period last year (€16.2 billion), while the average daily traded value reached €71.3 million compared to €65.0 million in 2020, recording an increase of 9.7%.

In 2021, capitals totalling €8.1 billion were raised, of which €1.4 billion through the issue of bonds.

BUSINESS DEVELOPMENTS

In 2021, the following projects started to be implemented:

- Development of a Credit Rating and Credit Policy Model with the aim of increasing competitiveness.
- Examination of extension of Clearing Authorization: Development of a Clearing and Risk Management Model for futures on 10-year Greek Government Bonds (bond future).
- Execution of the EU-wide Stress Test (ESMA, EBA)
- Introduction of futures to underlying transactions of the Greek Banking Index and the Bulgarian market (shares, equity indices and electricity indices)
- Assumption of the role of clearing member in futures with underlying natural gas indices of the Romanian market.

COMMENTS ON THE RESULTS

The turnover of ATHEXClear in 2021 came to €8.9 million compared to €8.8 million, recording a 1% increase from the previous year, while net profit after tax reached €294 thousand in 2021 compared to €475 thousand in the same period last year, showing a decrease of 38%.

Revenue from post-trading services (representing 98% of the turnover of the Company) came to €8.7 million compared to €8.6 million in 2020, showing an increase of €126 thousand or 1.5%.

The operating revenue of the Company in 2021 after deduction of the Capital Market Commission Fee reached €8.2 million compared to €8.1 million in 2020.

The expenses of the Company, including the flat settlement fee, reached €7.2 million in 2021 compared to €7 million in 2020, showing an increase of 176 thousand or 2.5% compared to the previous financial year.

Personnel remuneration and expenses came to €863 thousand compared to €1.11 million, showing a decrease of 22.4%. This decrease is due to an amount for employee compensation, which was accounted in 2020 in relation to 2021. The number of employees as at 31/12/2021 was 23 persons, remaining unchanged compared to 31/12/2020.

With regard to Earnings Before Interest and Taxes (EBIT), ATHEXClear shows a profit of €542 thousand compared to €761 thousand in the same period last year, recording a decrease of 28.8%.

The results include the following financial indicators:

	31/12/2021	31/12/2020	Deviation %
EBITDA %	11.07%	12.58%	(11.98)%
Cash flows after investment (in thousand €)	391	199	96.48%
Return on Assets (ROA) %	1.81%	1.61%	12.63%
Return on Equity (ROE) %	2.05%	1.63%	25.43%
Degree of financial self-sufficiency	92.00%	93.48%	(1.58)%

THIRD PARTY BALANCES IN ATHEXClear BANK ACCOUNTS

In order to conform with the corporate governance framework laid down by Regulation (EU) 648/2012 of the European Parliament and of the Council (EMIR Regulation), the Company keeps all cash collaterals managed by the Company and relating to the cash market and the derivatives market, as well as its own cash balances, in an account with the Bank of Greece, as a direct participant through the Internet in the Trans-European Automated Real-time Gross Settlement Express Transfer System (TARGET2-GR).

Therefore, its own cash balance and the balances of third parties (margins) are deposited in the same account that ATHEXClear holds with the Bank of Greece, and as a result a separation of the assets is necessary in order for the collateral that ATHEXClear collects to be shown separately in the current assets of 31/12/2021. In the Statement of Financial Position of 31/12/2021, they are shown as equal amounts both in current assets and in current liabilities as “third party balances in the bank account of the Company” and concern exclusively margins in the cash and derivatives markets that were deposited in the bank account held by ATHEXClear with the Bank of Greece as at 31/12/2021.

SHARE CAPITAL

The share capital of the Company was reduced by an amount of €12,580,000 through the reduction of the nominal value of each share by €1.48 and payment of the corresponding amount to the parent company. Hence, the share capital of the Company amounts to €12,920,000 and consists of 8,500,000 shares of a nominal value of €1.52 each.

DIVIDEND POLICY

The Ordinary General Meeting of 31/05/2021 approved the distribution of a dividend of €0.05 per share for the 8,500,000 shares of the Company. The dividend amounting to €420,000 was paid to the parent company Hellenic Exchanges - Athens Stock Exchange.

TRANSACTIONS BETWEEN RELATED PARTIES

In the financial years 2021 and 2020 there were no transactions with related parties concerning the remuneration of executives of the Company.

OUTLOOK FOR 2022

Both the Greek and the world economy are still facing the effects of the pandemic to a lesser extent than in previous years, but both the inflationary pressures and the developments in Ukraine are affecting the anticipated economic activity. In 2021, the GDP of Greece grew by 8.3%, an increase that was boosted by the demand built up because of the postponement of expenditure during the pandemic, the investments, the beginning of implementation of the actions of the Recovery and Sustainability Plan and the dynamic recovery of revenues from tourism and exports of goods. The EU estimate for 2022 predicts a further increase of 4.9%, while the war in Ukraine and inflationary pressures are expected to slow the growth rate. Inflationary pressures are expected to subside, in view of the prospect that the war in Ukraine will end soon. Specifically, the estimates of the European Central Bank are that inflation will drop to 2.1% in 2023 and to 1.9% in 2024.

The gradual elimination of the effects of the coronavirus pandemic, the end of the war in Ukraine, the normalization of the energy prices and the confirmation of the predictions that inflationary pressures will be short-term will allow a quick return to normalcy and risk appetite, shaping a positive outlook for the improvement of the climate in local businesses. In the immediate future, the aid of the of the resources of the Recovery Fund is expected to be noticeable, as set forth in the Greece 2.0 plan, and the Greek capital market is expected to play a central role with positive effects in the results of the ATHEX Group.

The excellent organization of the Group, the smooth operation of the stock market even in particularly difficult situations such as the current circumstances, the continuous investment in modern equipment and processes, the absence of debt liabilities, the acknowledgement of its reliability by internationally recognized rating agencies, as well as its liquidity, are the guarantee for lasting survival with significant benefits for the shareholders, the employees and the society in general.

TURNOVER - RISKS AND UNCERTAINTIES

The revenue of ATHEXClear is largely affected by factors that the Company cannot influence, as they are connected with the development of values in the Greek capital market, which are in turn influenced by a number of factors, such as the key financial figures of listed companies, the fundamental macroeconomic elements of the Greek economy and the developments in the international capital markets.

Apart from the clearing fees for transactions carried out on the markets of the Athens Exchange, which are collected through the Members, revenues from transfer and split of transactions, from trade notification instructions, from subscriptions of clearing members, from trade repository (TR) service etc. are major sources of income for the Company.

Unlike on the side of revenue, the size of which cannot be determined by ATHEXClear, concerted efforts are made for rationalization on the side of expenditure, with the aim to improve the financial results of the Company even in adverse market conditions.

The COVID-19 health crisis halted the positive trend that had emerged in the previous years. The world economy has entered a period of uncertainty and instability, the consequences of which are hard to assess based on the information available so far. The economic effects will depend on the length and intensity of the recession, as well as on the existing prospects for recovery.

CLEARING FUND MANAGEMENT

SECURITIES MARKET

Athens Exchange Clearing House S.A. (ATHEXClear) manages the Clearing Fund with the aim of protecting the System from credit risks of the Clearing Members arising from the clearing of the transactions.

The contribution of each Clearing Member to the Clearing Fund is determined based on each Share of the Clearing Member in it. The Share consists of the total amount of the contributions that have been paid into the Clearing Fund by the Clearing Member for its creation, increased by any revenues resulting from the rules for management and investment of the assets of the Clearing Fund and by the cost of managing risk and margins, as determined with the ATHEXClear procedures. Revenues and expenses are allocated in respect of each Clearing Member Share in the Clearing Fund in proportion to its size.

The minimum size of the Clearing Fund is based on the amount of transactions carried out by each Clearing Member and is calculated as specifically described in the decisions of the Hellenic Capital Market Commission and in Part 5, Section II of the ATHEXClear Regulation for the Clearing of Book-Entry Securities Transactions, as applicable. For each month, the difference between the new and the previous balance for each Clearing Member Share is paid or collected, accordingly, by the Manager of the Clearing Fund.

DERIVATIVES MARKET

The Board of Directors of ATHEXClear at its meeting No. 109 of 17/11/2014 approved the development of a set of risk management policies and methods in light of the change of the clearing model in the derivatives market, the Regulation for the Clearing of Derivative Transactions, but also for the adaptation to the requirements of the EMIR Regulation.

In accordance with the new Regulation for the Clearing of Derivative Transactions and particularly Part 5 of Section II, a Clearing Fund is calculated monthly for the Derivatives Market. Calculation is made on a monthly basis. The management of the Clearing Fund in the derivatives market does not differ from that of the Clearing Fund in the cash market.

RISK MANAGEMENT

General – Risk Management Environment

Athens Exchange Clearing House (ATHEXClear) is a subsidiary of the Athens Exchange Group (ATHEX) and operates as a Qualifying Central Counterparty (QCCP)[1] for the clearing of transactions in the securities and derivatives markets of ATHEX and for the purchase of derivatives of the Hellenic Energy Exchange (HEnEx).

ATHEXClear has been authorized in accordance with the European Market Infrastructure Regulation (EMIR)[2] since 2015[3] and holds a clearing license for all European Union markets (EU-wide passport) in the following product categories[4]:

- Securities: shares, stock options, stock-warrants, government and corporate bonds.
- Derivatives: futures and options on shares and equity indices, futures on exchange rates, gold and oil, futures and options on electricity and natural gas indices, lending and repurchase agreements.

Risk Management Committees

- Risk Committee (RC), advisory committee of the Board of Directors on matters of strategy with regard to risk management issues, in accordance with the Regulation (EMIR).
- Default and Crisis Management Committee (DCMC), executive committee of the Board of Directors on matters relating to the day-to-day operation of risk management and the management of default of Clearing Members.

Institutional Framework

The internal and external institutional framework to which ATHEXClear is immediately subject in respect of its obligations regarding risk monitoring and management includes (a) the Risk Management Frameworks approved by the Board of Directors, the Risk Management Methods and the Frameworks for Control and Validation of the Risk Management Models, (b) the Regulations for the Clearing of Book-Entry Securities and Derivative Transactions, (c) the Decisions 1 to 16 of the Board, and (d) the Regulation (EU) 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories (EMIR), as well as the relevant commission delegated regulations (RTS).

Risk Strategy and Risk Management

A key aim of ATHEXClear is the prudent management of the risks arising from the provision of clearing services to its Clearing Members (CM) with the ultimate goal of ensuring its lasting sustainability and the continuation of its activities (going concern approach).

Thus, in accordance with the strategy of ATHEXClear, the level of risk appetite is determined so as to be consistent with its capital adequacy, to satisfy the needs of the market, to reduce the cost for the participants, to maximize benefits from business opportunities but also to ensure the security of the market and the compliance with the regulatory requirements.

---

[1] In accordance with European directives and regulations CRD/CRR), capital requirements towards *qualifying central counterparties (QCCP)* are significantly lower compared to non-qualifying central counterparties.
[2] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32012R0648
[3] Extension of clearing authorization to energy derivatives (28/02/2020): futures on electricity and natural gas indices and options on such futures contracts.
[4] https://www.esma.europa.eu/sites/default/files/library/ccps_authorised_under_emir.pdf

ATHEXClear abides by the Principles for Financial Market Infrastructures (PFMI) issued by the Committee on Payment and Settlement Systems (CPSS) and the Technical Committee of the International Organization of Securities Commissions (IOSCO) in April 2012.

ATHEXClear publishes on a quarterly basis quantitative information regarding its activity, following the guidelines of the Committee on Payments and Market Infrastructures (CPMI) and the International Organization of Securities Commissions (IOSCO)[5].

Governance and Organization of the Risk Management Function

The Board of Directors assumes the ultimate responsibility and accountability for the risk management of the Company. Also, the Board determines and documents the appropriate level of risk appetite and the risk capacity of the Company.

At ATHEXClear, the Risk Management Unit operating under the supervision and guidance of the Chief Risk Officer (CRO) is tasked with comprehensively addressing the risks the company faces with the aim of identifying, assessing and ultimately managing such risks. The CRO reports to the Board through the Chairman of the Risk Committee and implements, among other things, the risk management framework, the policies and procedures established by the Board, as well as the decisions of the Board.

Each organizational unit of the company is responsible for monitoring and managing potential risks in such a way as to react promptly and effectively in case of occurrence of risk events (mainly for matters of operational risk).

Continuing the endeavour of recent years, in 2021 actions were taken to strengthen the risk management function in order to keep it in line with the EMIR regulation and ensure it adheres to the international best practices (recruitment of more staff, new IT system, process automation etc.).

The organizational structure that supports the risk management function consists of the following:

Board of Directors

The Board has the ultimate responsibility and accountability with respect to the governance of the risk management function of the Company. Specifically, the Board sets, determines and documents an appropriate level of risk appetite and risk capacity of the Company. In addition, the Board and the senior executives ensure that the policies, processes and audits of the Company are consistent with the appropriate level of risk appetite and the risk capacity of the Company and examine how the Company identifies, reports, monitors and manages risks.

Risk Committee

It serves as an advisory committee of the Board pursuant to the provisions of Article 28 of the EMIR Regulation and in accordance with the specific provisions of the Regulations for the Clearing of Transactions on Derivatives and Book-Entry Securities and the decisions of the Board.

Default and Crisis Management Committee

It serves as executive committee of the Board and reports directly to it. The Committee has decisive responsibilities with respect to the day-to-day management of risks, as well as the management of emergency circumstances, such as the intense price volatility in the market or the event of default of a clearing member.

Risk Management Unit (RMU)

It is sufficiently independent from the other departments of the company and its key mission is to address comprehensively the risks that ATHEXClear faces with the aim of identifying, assessing and ultimately managing such risks. The RMU has the necessary authority, the required resources, expertise and access to all information necessary to perform its work.

Chief Risk Officer (CRO)

The CRO reports to the Board of Directors on matters of risk management through the Chairman of the Risk Committee and implements the risk management framework through the policies and procedures established by the Board. As head of the Risk Management Unit, the CRO supervises and leads its Staff in [...]

[5] https://www.athexgroup.gr/el/regulated-publication

Organizational Units

These are responsible for the identification and management of the risks that fall within their scope (mainly operational risk).

Specifically, the RMU monitors the risk levels of the company on a continuous basis using the special and approved risk management procedures. The key assumptions, the data sources and the processes used in measuring and monitoring risks are documented and tested for their reliability on a regular basis through the review and audit framework and the validation framework. The main method used for market risk measurement is the Filtered Historical Simulation (FHS) for measuring Value at Risk (VaR) with a level of statistical significance of 0.8% to 1.0%.[6]

A series of tests for counterparty credit risk and liquidity is carried out on a daily basis to determine the adequacy of pre-funded financial resources for each clearing area separately in extreme but reasonable market conditions (stress-tests).

Risk categories

The Company addresses all categories of risks, both internal and external, placing priority on those that have been identified as significant (counterparty credit risk, liquidity and operational risk). It is recognized that each service offered by the Company can expose it to any combination of the risks mentioned below.

The risks to which the Company may be exposed due to the nature of its activities are:

Credit risk

It is defined as the risk of incurring losses, mainly due to default of obligors, primarily arising from equity investments in commercial banks and the existence of balances payable to customers and Clearing Members.

Counterparty credit risk

It is defined as the risk that the company will suffer loss due to default of one or more counterparties.

Market risk

It is defined as the risk that the company will suffer loss due to adverse changes in exchange rates, interest rates, market prices, commodities and volatility as a result of occurrence of counterparty risk.

Liquidity risk

It is defined as the risk that the company will suffer loss due to inadequate liquidity for covering the default of Clearing Members and operational requirements (increased funding cost, failure to meet obligations) and for performing clearing operations.

Operational risk

It is defined as the risk of incurring losses due to deficiency or failure of internal procedures and systems, human factor (errors, fraud) and external events, including legal risk. The risk relating to the security of IT systems, as in most companies, is now beginning to be considered as very important and the appropriate measures are taken for its mitigation. There is an independent Information Security Unit in the Group. The Company has a system and appropriate business continuity processes (BCP). A key characteristic of the Company is the relatively low dependence on outsourced and third-party service providers in respect of performance of its critical functions.

Business risk

It is defined as the risk of realizing lower than expected revenue due to internal or external factors, such as increased competition, adverse economic circumstances (decrease in the volume of stock market transactions, deterioration in the liquidity of domestic and international financial markets), failure to control costs, failure to keep with new technological developments in the business etc.

Market Risk

The Company is exposed to a limited extent to market risk arising from its operating activities and the maturity mismatch of assets and liabilities (interest rate risk), but with the recent change in investment policy (06/2020)

[6] https://www.athexgroup.gr/el/clearing-risk-management

this risk is actively managed. Potential loss from market risk may occur in the event of default of a clearing member (counterparty credit risk) as ATHEXClear is required to execute security transactions in order to close out the positions of the defaulting member. In each instance, the Company monitors the possible exposure to market risk and calculates the required pre-funded resources that must be kept against the risk in accordance with the Methodology for Calculating Risk Management Parameters and the Framework for Reviewing Models and Controls. In each instance, the Company does not express any appetite for such risk beyond the specific pre-funded resources of the company in the event of default of a Clearing Member (Regulatory Dedicated Own Resources / Skin in the Game – SIG) in accordance with the Regulation (EMIR).

Credit Risk and Counterparty Risk

ATHEXClear has been granted by the Hellenic Capital Market Commission a licence to manage and operate systems for clearing trades on dematerialized securities and on derivatives. In this capacity, ATHEXClear bears the risk of default by the Clearing Members on their obligations to clear and settle trades, as described in the Rulebooks (counterparty credit risk). In addition, as of 22 January 2015 ATHEXClear has been licensed as a Central Counterparty under the EMIR Regulation and is required to comply with the provisions of the European regulation and the relevant regulatory technical standards (EMIR and EMIR-RTS).

The company has established and makes use of several mechanisms and financial resources to manage and cover the risks it assumes and to ensure the orderly operation of the system in general in connection with the scope and scale of the transactions, the clearing of which it has undertaken. The mechanisms that ATHEXClear implements are described in the "Regulation for the Clearing of Book-Entry Securities Transactions", in the "Regulation for the Clearing of Derivative Transactions" and in the relevant decisions of the Board.

In order to obtain the status of a Clearing Member, the Investment Services Company or the Credit Institution must fulfil specific minimum requirements of financial and operational adequacy, which are laid down in the Clearing Rulebooks and which must be continuously satisfied during the entire membership in ATHEXClear.

Both for the cash market and for the derivatives market, ATHEXClear clears transactions assuming the role of Central Counterparty. To cover the risk with respect to its Clearing Members, ATHEXClear monitors and calculates on a daily basis (on an end-of-day as well as on an intraday basis, almost in real time) margins for each clearing account of the Clearing Members and blocks any additional guarantees in the form of cash and/or securities (minimum margin cover of 40%). In addition, it manages the Clearing Funds of the two markets, which function as risk sharing funds and to which Clearing Members contribute exclusively in cash. Based on the margins that have been blocked, the credit limits extended to members are continuously reviewed, and the compliance with the credit limits is monitored in real time during the trading session. The minimum amount of the Clearing Funds is updated at least monthly in accordance with the provisions of the regulation, so as to be adequate at the very least to cover at any time the requirements laid down by EMIR (Cover 1 & 2), i.e. to absorb losses in excess of the margins in the event of default of at least the two (2) groups of Clearing Members with respect to which ATHEXClear would incur the largest loss from closing out their positions in extreme but reasonable market conditions for each separate market (securities, derivatives).

The risk management models and the parameters used are examined as to their effectiveness on a daily basis and in extreme but possible scenarios (Margin/Haircut Back-Testing, Parameter Sensitivity Analysis etc.), while on an annual basis the results are reviewed and the analysis is presented to the Risk Committee. In addition, the models are validated on an annual basis by an independent specialized consultant (model validation) and the report prepared is filed with the Hellenic Capital Market Commission.

As part of the Investment Policy, specific principles are defined regarding the arrangements for the investment of cash balances of the company and of the clearing members. The liquid assets of the Company that can be deposited in systemic commercial banks concern up to two thirds (2/3) of the difference between equity and the minimum capital requirements, while the remaining cash and the pre-funded resources of the Clearing Members (Clearing Fund shares and cash to cover margins) are deposited exclusively with the Bank of Greece (TARGET 2), a fact that minimizes the exposure of the Company to credit risk. The liquid assets of ATHEXClear deposited with commercial banks are not taken into account for covering capital requirements and Cover 1 & 2.

ATHEXClear maintains specific pre-funded funds separately for each Clearing Fund (SIG), for absorbing losses in the event of default of a Clearing Member before making uses of the Clearing Fund.

Liquidity Risk

The liquidity risk to which ATHEXClear is exposed arises from its business activity and its operation as a central counterparty.

The aim of ATHEXClear is to maintain an adequate level of liquidity to ensure that it is in a position to fulfil its obligations concerning payments or settlements in all relevant currencies that become payable at the end of each day or, if required, on an intraday basis. The liabilities are assessed based both on its business plan and on possible but unforeseen events (e.g. default of a Clearing Member).

The available liquidity of ATHEXClear is reviewed in relation to the criteria established by EMIR. On a daily basis but also in extreme but plausible scenarios of extreme market conditions it is examined whether the liquid assets are sufficient to cover the default of the two (2) groups of Clearing Members in respect of which the Company has the highest liquidity requirement for closing out their positions for each separate market (securities, derivatives). In addition, the projected liquidity gaps for the entire Company are monitored through liquidity gap analysis on a daily basis.

Operational Risk

The Company does not seek to undertake operational risk but accepts that operational risk may arise as a result of system failure, internal procedures, human error or external events. Specifically, it is recognized that operational risk may arise, among other things, because of: outsourcing, matters of supervisory and regulatory compliance, business continuity, IT systems and information security risks and project implementation risks.

Operational risk is maintained at acceptable levels, through a combination of proper corporate governance and risk management, robust systems and audits.

In 2021 there were no significant instances of interruption of the clearing and/or risk management operations due to failure or unavailability of IT systems or to human error. There were no losses or monetary claims arising from litigation (legal and court expenses), from non-compliance with the supervisory framework and the contractual obligations of the Company or from external events.

Measures to reduce operating risk

The Company recognizes the need to determine, assess, monitor and reduce operational risk inherent in its operations and activities, as well as the need to maintain adequate funds, in order to be able to deal with this specific category of risk.

In accordance with the EMIR Regulation, the capital requirement for operational risk is calculated using the Basic Indicator Approach (BIA) and in addition a framework has been established for the systematic monitoring and management of operational risk.

The most significant measures for reducing operational risk are the implementation of a business continuity plan for all critical services of the Group, the purchase of insurance policies, as well as measures to ensure compliance with the new regulations. The Company has an operational risk management framework setting out the policies and procedures for the management of operational risks, uses a specific system for the management of operational risk management, according to which ATHEXClear performs on a regular basis an RCSA[7] for the assessment and classification of risks, maintains a loss database[8], prepares regular reports and plans actions to improve risk management.

Business Risk

The Company recognizes that the occurrence of business risk can be caused by both internal and external factors. The adverse international and domestic economic environment, the changes in tax laws, the development of the regulatory environment and the structural changes in the microeconomic environment of companies operating in the wider sector of capital markets (buy/sell side) and of financial market infrastructure (FMI) companies, as well as the technological developments in the business, may intensify competition. Such events may have an

[7] Risk Control Self-Assessment (RCSA): at regular intervals ATHEXClear organizes workshops with the objective of classifying the risks according to the degree of danger at the level of procedures and determining Key Risk Indicators (KRIs).
[8] Loss Database: the database is updated on a daily basis with operational risk events regardless of the size of the loss.

impact on the growth and sustainability of the Company causing a decrease in the clearing activity and expected profits, inability to liquidate assets and/or impairment of their value etc.

The Company and, in general, the Group monitor continuously and systematically the developments and adapt to the emerging environment. The strategy of differentiation of the mix of products cleared by the Company, as well as the geographic dispersion of the Clearing Members and of the markets in which the Company operates, contribute among other things to the mitigation of this risk.

Specifically, for ATHEXClear, in accordance with the EMIR Regulation, the capital requirement for business risk is calculated on an annual basis.

Business Continuity Plan

The Athens Exchange Group has developed and put into operation appropriate infrastructures and a disaster recovery plan. ATHEXClear, as a member of the Group, is covered by this plan, which includes:

- *Operation of a Disaster Recovery Site:* The Athens Exchange Group maintains a disaster recovery site for its IT systems. In addition, the Group has received and maintains the ISO-22301 business continuity certification.
- *Formation of crisis management and emergency incident management teams:* The purpose of these teams is to maintain continuity in the provision of trading services in case of an unforeseen event. Specific responsibilities have been defined and assigned to specially trained executives of the Group.
- *Existence of back up IT systems:* The IT systems of the Athens Exchange Group have been installed and operate in the data centre at the headquarters of the Group. The data centre consists of two mirror – separate – data centres, independent as to their location, support facilities and technological services provided, to provide redundancy and high availability, ensuring the uninterrupted operation of the systems.

Insurance policies

Operational risks that the Athens Exchange Group is not able or does not wish to assume are transferred to insurance companies. The management of insurance policies takes place centrally for the entire Group in order to obtain better services and more advantageous terms. Specifically, the insurance covers include risks such as third party civil liability and professional liability (DFL/PI) as well as Directors & Officers (D&O) Liability. There are also insurance policies covering fire and other perils for the buildings and the work and accounting equipment of the Group.

Regulatory compliance

A regulatory compliance unit has been set up, having as its key objectives to ensure compliance with the legal and regulatory framework, regulations and policies, measuring and minimizing the risk of regulatory compliance and addressing the consequences of non-compliance with the legal and regulatory framework; the unit operates independently of other departments of the Company with clear and separate reporting lines from those of other company activities. The key responsibilities of the unit are:

- Monitoring changes in the regulatory and supervisory framework and informing the Board of Directors, the Audit Committee and the staff.
- Conducting gap analysis between the existing and future condition brought about by regulatory and supervisory changes.
- Monitoring the compliance of the company with the regulatory and supervisory framework.
- Handling requests related to compliance matters.
- Measuring and monitoring compliance risk.

Specifically for ATHEXClear, policies are being implemented concerning conflicts of interest, outsourcing, management of complaints of Clearing Members, remuneration of staff, executives and Directors and the management of its records, in accordance with the requirements of the EMIR Regulation.

INTERNAL AUDIT

A primary concern of the Company is the development and the constant improvement and upgrade of the Internal Audit System, which comprises all of the recorded audit mechanisms and processes that cover the whole range of daily operations and procedures of the Company.

In particular, as regards the financial operations of the Company, a system of safeguards is implemented, aiming at preventing and detecting on time essential errors in order to ensure the reliability of the financial statements, the effectiveness and efficiency of operations and the compliance with the existing institutional and regulatory framework. According to specific criteria of materiality (quantitative and qualitative), the important accounts are identified, the procedures are recorded, the responsibilities and policies are defined and control points are set and used on a constant basis by Management and staff.

The Board of Directors has the ultimate responsibility for the determination of the Internal Audit System of the Company, as well as for the monitoring and evaluation of its effectiveness and adequacy.

The responsibility for monitoring compliance with the Internal Audit System lies with: a) the Audit Committee and b) the Internal Audit Division.

The Audit Committee of the Company has been established by decision of the Board of Directors of the Company and operates in accordance with the Standards for the Professional Practice of Internal Auditing of the Institute of Internal Auditors, the decision 5/204/14.11.2000 of the Hellenic Capital Market Commission, Law 3016/2002 on Corporate Governance, Regulation (EU) 537/2014, the provisions of Law 4449/2017, as well as the remarks, clarifications and recommendations of the Hellenic Capital market Commission as stated in its letter with Reference No. 1302/28.04.2017.

The main purpose of the Audit Committee is to assist the Board of Directors in the supervision of the quality, adequacy and effectiveness of the internal audit systems.

The Internal Audit Division operates in the manner prescribed by the International Professional Practices Framework (IPPF) regarding the Professional Practice of Internal Auditing of the Institute of Internal Auditors, the decision 5/204/14.11.2000 of the Hellenic Capital Market Commission and Law 3016/2002 on Corporate Governance. It reports to the Chief Executive Officer of the Company and operationally to the Board of Directors, through the Audit Committee, by which it is supervised.

The main responsibility of the Internal Audit Division is to express an opinion on the compliance or non-compliance of each audited area with the internal processes, as well as the application of the safeguards that have been adopted by Management, in order to prevent and avoid risk.

CORPORATE SOCIAL RESPONSIBILITY

Corporate responsibility is a key characteristic of all advanced societies and economies and concerns the ongoing effort for the improvement of the economic climate, the cultivation of an open dialogue with stakeholders and the community involvement of companies.

Given that corporations are entities inextricably linked with the societies in which they operate, affecting and being affected by the conditions of the time and the area of their operation, they must recognize their responsibilities towards society and the environment. A keystone in conveying the social accountability of businesses is Corporate Social Responsibility (CSR).

At the Company, we believe that Corporate Social Responsibility concerns us all. It is our responsibility for our impact on society and the environment. The Group to which we belong operates in a constantly changing globalized environment and is daily encountering challenges relating to its efficiency and its presence as an integral part of the social and financial process. In this environment, the trend now prevailing worldwide is that businesses should be encouraged to undertake greater initiatives in Corporate Social Responsibility as their decisive role and contribution in the social challenges is recognized.

For us at the Athens Exchange Group and, by extension, at ATHEXClear, Corporate Social Responsibility is intertwined with the concept of sustainable development, involves voluntary actions and is our strategic choice. We have created and maintain an action plan that encompasses the environment, the people and education:

- We endeavour to contribute in the alleviation of poverty by aiding the work of volunteer organizations that provide support to our fellow human beings.
- We continue our efforts for the protection of the environment through everyday recycling activities and by adopting new workplace methods intended to save energy.
- We promote and support a programme for offering information and education to schoolchildren, university students and members of the market aiming to develop the stock market culture.
- As an active member of the Greek Network for Corporate Social Responsibility, we support its efforts which are aimed at boosting awareness of the Corporate Social Responsibility both in businesses and in the society in general, as well as at attaining a balance between profitability and sustainable development.
- The Company offers a work environment of equal opportunities to all staff, where all rights arising from the law are respected. Furthermore, the Company attends to all work issues of the employees and constantly invests in their professional training and development.

MEMBERS OF THE BOARD OF DIRECTORS OF THE COMPANY

ATHENS EXCHANGE CLEARING HOUSE S.A	
Name	**Position**
George Handjinicolaou	Chairman, non-executive member
Alexios Pilavios	Vice Chairman, non-executive member
Yianos Kontopoulos *	Chief Executive Officer, executive member
Giorgos Doukidis	Independent non-executive member
Polyxeni Kazoli *	Independent non-executive member
Theano Karpodini	Independent non-executive member
Pantelis Tzortzakis	Independent non-executive member

* *On 8/3/2022 the Board of Directors elected Mr. Yianos Kontopoulos to replace Mr. Socrates Lazaridis.*

SIGNIFICANT EVENTS AFTER 31/12/2021

The Board of Directors, at its extraordinary meeting on 22/1/2022, unanimously selected Mr. Yianos Kontopoulos as the new Chief Executive Officer of the Company. The election of Mr. Kontopoulos as a new member of the Board of Directors took place on 08/03/2022.

The Ukrainian crisis that erupted in February 2022 is expected to cause significant turmoil in the global economy in 2022. Although the impact of the crisis on the Group cannot be fully predicted, the Group's overall exposure to the Ukrainian and Russian markets is minimal and the consequences are not expected to significantly affect the Group. Management is closely monitoring the situation and will take appropriate action when necessary.

There is no other event that has a significant effect in the results of the Company which has taken place or was completed after 31/12/2021, the date of the 2021 annual financial statements and up until the approval of the financial statements by the Board of Directors of the Company on 28/03/2022.

Athens, 28 March 2022

THE BOARD OF DIRECTORS

3. AUDIT REPORT OF THE INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS

To the Shareholders of Athens Exchange Clearing House SA ("ATHEXClear SA")

Report on the audit of the Annual Financial Statements

Our opinion

We have audited the accompanying annual financial statements of ATHEXClear SA (the "Company") which comprise the annual statement of financial position as of 31 December 2021, the annual statements of comprehensive income, statement of changes in equity and cash flow statement for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying annual financial statements present fairly, in all material respects the financial position of the Company as at 31 December 2021, their financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards, as adopted by the European Union and comply with the statutory requirements of Law 4548/2018.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs), as they have been transposed into Greek Law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the annual financial statements section of our report. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence

During our audit we remained independent of the Company in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) that has been transposed into Greek Law, and the ethical requirements of Law 4449/2017, that are relevant to the audit of the annual financial statements in Greece. We have fulfilled our other ethical responsibilities in accordance with Law 4449/2017, and the requirements of the IESBA Code.

Other Information

The members of the Board of Directors are responsible for the Other Information. The Other Information is the Board of Directors Report (but does not include the financial statements and our auditor's report thereon), which we obtained prior to the date of this auditor's report.

Our opinion on the annual financial statements does not cover the Other Information and except to the extent otherwise explicitly stated in this section of our Report, we do not express an audit opinion or other form of assurance thereon.

In connection with our audit of the annual financial statements, our responsibility is to read the Other Information identified above and, in doing so, consider whether the Other Information is materially inconsistent with the annual financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

With respect to the Board of Directors Report, we considered whether the Board of Directors Report includes the disclosures required by Law 4548/2018.

Based on the work undertaken in the course of our audit, in our opinion:

- The information given in the Board of Directors' Report for the year ended at 31 December 2021 is consistent with the annual financial statements,
- The Board of Directors' Report has been prepared in accordance with the legal requirements of articles 150 and 153 of Law 4548/2018.

In addition, in light of the knowledge and understanding of the Company and their environment obtained in the course of the audit, we are required to report if we have identified material misstatements in the Board of Directors' Report. We have nothing to report in this respect.

Responsibilities of Board of Directors and those charged with governance for the Annual Financial Statements

The Board of Directors is responsible for the preparation and fair presentation of the annual financial statements in accordance with International Financial Reporting Standards, as adopted by the European Union and comply with the requirements of Law 4548/2018, and for such internal control as the Board of Directors determines is necessary to enable the preparation of annual financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the annual financial statements, the Board of Directors is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless Board of Directors either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Company's financial reporting process.

Auditor's responsibilities for the audit of the Annual Financial Statements

Our objectives are to obtain reasonable assurance about whether the annual financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the annual financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the annual financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors.

- Conclude on the appropriateness of Board of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the annual financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the annual financial statements, including the disclosures, and whether the annual financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Report on other legal and regulatory requirements

With respect to the Board of Directors Report, the procedures we performed are described in the "Other Information" section of our report.

PricewaterhouseCoopers S.A.
268 Kifissias Avenue, 152 32 Athens
Reg. No. 113

Despina Marinou Reg N. 17681	Fotis Smyrnis Reg N. 52861

28 March, 2022

4. 2021 ANNUAL FINANCIAL STATEMENTS

For the period 1 January 2021 to 31 December 2021

In accordance with the International Financial Reporting Standards

4.1. ANNUAL STATEMENT OF COMPREHENSIVE INCOME

	Note	01/01/2021 31/12/2021	01/01/2020 31/12/2020
Revenue			
Post-Trading Services	5.6	8,728	8,602
Ancillary Services	5.7	134	168
Total turnover		**8,862**	**8,770**
Hellenic Capital Market Commission Fee	5.12	(708)	(670)
Total operating income		**8,154**	**8,100**
Expenses			
Personnel remuneration and expenses	5.8	863	1,112
Third party fees and expenses	5.9	201	161
Maintenance/IT support		43	61
Building and equipment management		31	32
Utilities		9	9
Settlement fee	5.10	5,571	5,071
Other operating expenses	5.11	346	403
Tax		109	148
Total operating expenses before depreciation and amortization		**7,173**	**6,997**
Earnings before interest, taxes, depreciation and amortization (EBITDA)		**981**	**1,103**
Depreciation and amortization	5.13 & 5.14	(439)	(342)
Earnings before interest and tax (EBIT)		**542**	**761**
Capital income		3	6
Financial expenses	5.18	(110)	(137)
Earnings before tax (EBT)		**435**	**630**
Income tax	5.22	(141)	(155)
Earnings after tax		**294**	**475**

Earnings after tax (A)		**294**	**475**
Other comprehensive income/(loss)			
Other comprehensive income not carried forward to following years			
Actuarial Gains/(Losses) from employee compensation provision		15	(31)
Income tax effect		(3)	7
Net other comprehensive income (B)		**12**	**(24)**
Net other comprehensive income (A) + (B)		**306**	**451**

Any differences in amounts in the annual financial statements as well as in respective amounts in the notes are due to rounding.

The notes on pages 27 to 60 form an integral part of these annual financial statements of 31/12/2021.

(Amounts in thousands euro, unless otherwise noted) 23

4.2. ANNUAL STATEMENT OF FINANCIAL POSITION

	Note	31/12/2021	31/12/2020
ASSETS			
Non-current assets			
Owner occupied property, plant and equipment	5.13	275	297
Right-of-use assets	5.14	366	402
Intangible assets	5.13	804	882
Deferred tax		52	51
Other long-term receivables	5.16	302	302
		1,799	**1,934**
Current assets			
Accounts receivable	5.15	499	904
Other receivables	5.15	58	91
Income tax receivable	5.22	48	146
Cash and cash equivalents	5.18	13,854	26,509
Third party balances in ATHEXClear bank account	5.17	238,497	220,866
		252,956	**248,516**
TOTAL ASSETS		**254,755**	**250,450**
EQUITY AND LIABILITIES			
Equity and reserves			
Share Capital	5.19	12,920	25,500
Reserves	5.19	312	289
Retained earnings	5.19	1,728	1,866
Total equity		**14,960**	**27,655**
Non-current liabilities			
Lease liabilities	5.14	355	387
Employee compensation provision	5.20	182	191
Other provisions	5.20	20	20
		557	**598**
Current liabilities			
Accounts payable and other liabilities	5.21	642	1,223
Taxes payable		26	32
Social security		40	45
Lease liabilities	5.14	32	31
Third party balances in ATHEXClear bank account	5.17	238,497	220,866
		239,238	**222,197**
TOTAL LIABILITIES		**239,795**	**222,795**
TOTAL EQUITY & LIABILITIES		**254,755**	**250,450**

Any differences in amounts in the annual financial statements as well as in respective amounts in the notes are due to rounding.

The notes on pages 27 to 60 form an integral part of these annual financial statements of 31/12/2021.

(Amounts in thousands euro, unless otherwise noted) 24

4.3. ANNUAL STATEMENT OF CHANGES IN EQUITY

	Share Capital	Reserves	Retained earnings	Total Equity
Balance on 01/01/2020	**25,500**	**254**	**5,276**	**31,030**
Earnings for the period	0	0	475	475
Other comprehensive income after tax	0	0	(24)	(24)
Total comprehensive income after tax	**0**	**0**	**451**	**451**
Earnings distribution to reserves	0	35	(35)	0
Dividend paid	0	0	(3,825)	(3,825)
Balance on 31/12/2020	**25,500**	**289**	**1,866**	**27,655**
Earnings for the period	0	0	294	294
Other comprehensive income after tax	0	0	11	11
Total comprehensive income after tax	**0**	**0**	**305**	**305**
Earnings distribution to reserves	0	23	(23)	0
Dividend paid	0	0	(420)	(420)
Reduction of share capital	(12,580)	0	0	(12,580)
Balance on 31/12/2021	**12,920**	**312**	**1,728**	**14,960**

Any differences in amounts in the annual financial statements as well as in respective amounts in the notes are due to rounding.

The notes on pages 27 to 60 form an integral part of these annual financial statements of 31/12/2021.

(Amounts in thousands euro, unless otherwise noted) 25

4.4. ANNUAL CASH FLOW STATEMENT

	Note	01/01/2021-31/12/2021	01/01/2020-31/12/2020
Cash flows from operating activities			
Profit /Loss before tax	4.1	435	630
Plus/(Minus) adjustments for:			
Depreciation and amortization	5.13 & 5.14	439	342
Employee compensation provisions	5.20	5	40
Interest income		(3)	0
Interest paid and related expenses	5.18	110	137
Plus/(minus) adjustments for changes in working capital accounts or relating to operating activities			
(Increase)/Decrease in receivables		438	(304)
Increase/(Decrease) in liabilities (except loans)		(595)	391
Interest and related expenses paid		(94)	(115)
Income tax paid	5.22	(45)	(377)
Total inflows/outflows from operating activities (a)		**690**	**744**
Cash flow from investing activities			
Purchase of tangible and intangible assets	5.13	(302)	(545)
Interest received		3	0
Total inflows/(outflows) from investing activities (b)		**(299)**	**(545)**
Cash Flows from financing activities			
Distribution of dividends	5.19	(420)	(3,825)
Return of capital	5.19	(12,580)	0
Lease payments	5.14	(46)	(46)
Total outflows from financing activities (c)		**(13,046)**	**(3,871)**
Net increase/(decrease) in cash and cash equivalents at the beginning of the period (a) + (b) + (c)		(12,655)	(3,672)
Cash and cash equivalents at the beginning of the year		**26,509**	**30,181**
Cash and cash equivalents at the end of the year		**13,854**	**26,509**

Any differences in amounts in the annual financial statements as well as in respective amounts in the notes are due to rounding.

The notes on pages 27 to 60 form an integral part of these annual financial statements of 31/12/2021.

(Amounts in thousands euro, unless otherwise noted) 26

5. NOTES TO THE ANNUAL FINANCIAL STATEMENTS FOR 2021

5.1. GENERAL INFORMATION ABOUT THE COMPANY

The Company under the name "ATHENS EXCHANGE CLEARING HOUSE SOCIÉTÉ ANONYME" and the trade name "ATHEXClear" was set up on 22/07/2005 (originally under the name "Ypsipyli Société Anonyme for the Development of Real Estate and the Provision of Services" and the trade name "Ypsipyli Real Estate S.A." and the announcement of its formation and the relevant registration in the Companies Register was published in the Government Gazette No. 8298 of 27/07/2005. The General Electronic Commercial Registry (G.E.MI.) number of the Company is 6410501000 (formerly Companies Register No. 58973/01/B/05/309).

The annual financial statements of the Company for the financial year 2021 were approved at the meeting of the Board of Directors of 28/03/2022. The financial statements of the company are included in the Consolidated Financial Statements prepared by the Athens Exchange Group and are published on the Internet at www.athexgroup.gr.

5.2. BASIS OF PRESENTATION OF FINANCIAL STATEMENTS

The financial statements have been prepared in accordance with the International Financial Reporting Standards (IFRS) issued by the International Accounting Standards Board (IASB) and in accordance with their respective interpretations issued by the IASB Standards Interpretation Committee, as adopted by the European Union. No standards and interpretations of standards have been applied before the date they went into effect.

These financial statements have been prepared on a historical cost basis and according to the going concern principle. The accounting principles set forth below have been applied consistently to all the periods presented.

The perfect organization of the Company, the impeccable operation of the stock market, the continuous investment in modern equipment and processes, the absence of debt liabilities, the acknowledgement of its reliability by internationally recognized rating agencies, as well as the liquidity that it possesses, are the guarantee for lasting survival with significant benefits for the shareholders.

The preparation of the Financial Statements in accordance with the International Financial Reporting Standards requires the Management of the Company to make significant assumptions and accounting estimates that affect the balances of the Asset and Liability accounts, the disclosure of contingent assets and liabilities as at the date of preparation of the Financial Statements, as well as the revenues and expenses presented in the financial year under consideration. Despite the fact that these estimates are based on the best possible knowledge of Management as regards the current conditions, actual results may differ eventually from these estimates.

Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be probable under reasonable circumstances. The Management of the Company considers that there are no estimates and assumptions involving a significant risk of causing material adjustments to the carrying amounts of assets and liabilities.

Going concern

Management examines the key financial information and, where appropriate, the compliance with medium term budgets, together with the existing loan conditions, if any, in order to arrive at the conclusion that the going concern assumption is appropriate for use in the preparation of the annual financial statements of the Company.

The uncertainty that has existed globally in the capital markets for two years since the outbreak of the pandemic seems to decrease with the intensification of vaccination of the population and the trading activity stays at satisfactory levels. We consider that from 2022 the normalization of the situation will be further increased with a gradual return to normalcy. The Company has developed an effective crisis management mechanism, which ensures both seamless business continuity and system security (including cybersecurity systems and data protection in remote working environment).

Defined benefit plans

The cost of the benefits for defined benefit plans is calculated using actuarial estimates, which in turn use assumptions regarding the discount rates, the salary increase rates and the mortality rates. Due to the long-term nature of these plans, such assumptions are subject to significant uncertainty (note 5.20).

5.3. BASIC ACCOUNTING PRINCIPLES

The basic accounting principles adopted by the Company for the preparation of the accompanying financial statements are as follows:

5.3.1. Owner occupied property, plant and equipment

Tangible assets are initially recognized at cost and are subsequently evaluated at cost less accumulated depreciation and any impairment.

The acquisition cost includes all directly attributable expenses for the acquisition of the assets.

Subsequent expenses are recorded in addition to the carrying amount of property, plant and equipment or as a separate asset only if it is deemed possible that financial benefits will flow to the Company and provided their cost can be measured reliably.

The cost of repairs and maintenance is recognized in the Statement of Comprehensive Income when incurred.

The depreciation of other tangible assets is calculated using the straight-line method over their useful life.

	Useful Life after 01/01/2014
Machinery	5 years or 20%
Means of transportation	6.25 years or 16%
Other equipment	5-10 years or 20-10%

The useful life and residual values of tangible assets are revised annually. When the carrying amount of property, plant and equipment exceeds their recoverable value, the difference (impairment) is recognized as an expense in the Statement of Comprehensive Income.

On withdrawal or sale of an asset, the associated cost and accumulated depreciation are deleted from the relevant accounts at the time of withdrawal or sale and the respective profit or loss is recognized in the Statement of Comprehensive Income.

5.3.2. Intangible assets

Intangible assets include software licences valued at the acquisition cost less amortization. Amortization is calculated using the straight-line method over the useful life of these assets, which is estimated at 5 years. It is stressed that the annual amortization rates applied by the Company for intangible assets/rights are set at 20%.

It is stressed that the amortization rates applied by Group for capitalized costs for development-upgrade of the basic systems are at 10% for costs capitalized as from 01/01/2018.

5.3.3. Foreign currency translation

(Amounts in thousands euro, unless otherwise noted) 29

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Gains and losses resulting from the settlement of foreign currency transactions and from the translation at year-end exchange rates of monetary Assets and Liabilities denominated in foreign currencies are recognized in the Statement of Comprehensive Income. Foreign exchange differences resulting from non-monetary assets measured at fair value are deemed as part of the fair value and are therefore recognized together with fair value differences.

5.3.4. Impairment of non-financial assets

At the date of the financial statements the Company examines whether there are indications of impairment for non-financial assets. The carrying amounts of assets are revised for any impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. When the carrying amount of an asset exceeds its recoverable value, an impairment loss is recognized in the Profit and Loss Statement. The recoverable amount is calculated as either the fair value less sale expenses or the value in use, whichever is higher. The fair value less sale expenses is the amount resulting from the sale of an asset in an independent transaction between informed and willing parties, after the deduction of all additional direct sale expenses, while the value in use is the present value of the estimated future cash flow expected to result from the continuing use of the asset and its disposal at the end of its useful life. For the assessment of the impairment, the assets are grouped at the lowest level for which there are discrete identifiable cash flows.

5.3.5. Financial instruments

Financial instrument is any contract that simultaneously gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

Recognition and subsequent measurement of financial assets

As of 1 January 2018, financial assets are classified on the initial recognition and subsequently measured at amortized cost, at fair value through other comprehensive income or at fair value through profit or loss. The classification of financial assets on the initial recognition is based on the contractual cash flows of the financial assets and the business model in which the financial asset is held.

Except trade receivables, the Company initially measures a financial asset at fair value plus transaction costs, in the case of a financial asset not measured at fair value through profit and loss. Trade receivables are initially measured at transaction price as defined by IFRS 15.

In order to classify and measure a financial asset at amortized cost or fair value through other comprehensive income, cash flows must result that are solely payments of principal and interest on the principal outstanding. This measurement is known as SPPI (solely payments of principal and interest) criterion and is applied at the level of a separate financial instrument.

After the initial recognition, the financial assets are classified into three categories:

- at amortized cost;
- at fair value through other comprehensive income;
- at fair value through profit or loss.

The Company does not hold assets measured at fair value through profit or loss as at 31 December 2021.

Financial assets at amortized cost

The financial assets and the financial liabilities carried at amortized cost are subsequently measured using the effective interest rate (EIR) method. The financial assets are subject to impairment testing. Gains and losses are recognized in profit or loss when the financial asset or financial liability is derecognized, modified or when the financial asset is impaired.

The Company recognizes cash and cash equivalents, accounts receivable and other trade receivables and third party balances in bank accounts of the Group as financial assets at amortized cost and accounts payable and other payables and third party balances in bank accounts of the Company as financial liabilities.

The Company recognizes third-party balances as a financial asset because they are deposited in bank accounts of the Company with the Bank of Greece and simultaneously as a financial liability because after the completion of the clearing transactions there is a contractual obligation for their repayment to the counterparty.

The financial assets and the respective financial liabilities are initially recognized at fair value and measured at amortized cost. Their carrying amount at each reporting date is close to their fair value due to their short-term nature as the effect of the discount is not significant.

Financial assets designated at fair value through comprehensive income

At the initial recognition, the Company may choose to classify irrevocably its equity investments as equity instruments designated at fair value through comprehensive income when they meet the definition of equity under IAS 32 – Financial Instruments: Presentation and are not held for trading. The classification is determined on an instrument-by-instrument basis.

Gains and losses from these financial assets are never recycled into profit or loss. Dividends are recognized as other income in profit and loss when the right to payment is established, unless the Company benefits from such proceeds as a recovery of part of the cost of the financial asset, in which case such gains are recorded in other comprehensive income. Equity instruments designated at fair value through comprehensive income are not subject to impairment assessment.

The Company does not possess financial assets in this category.

Impairment of financial assets

The Company assesses at each reporting date whether an asset or a group of financial assets has been impaired as follows:

For trade receivables and contractual assets, the Company applies a general approach in calculating expected credit losses. Therefore, at each reporting date, the Company recognizes a loss allowance for a financial instrument at an amount equal to lifetime expected credit losses without tracking changes in credit risk.

Derecognition of financial assets

A financial asset (or part of a financial asset or part of a group of similar financial assets) is derecognized when:

- the rights to the cash flows from the asset have expired;
- the Company retains the rights to receive cash flows from the specific asset but has also assumed an obligation to pay the cash flows in full without material delay to a third party under a pass-through arrangement; or
- the Company has transferred its rights to receive cash flows from the specific asset and also either (a) has transferred substantially all risks and rewards of the ownership of the asset or (b) has not transferred substantially all risks and rewards, but has transferred control of the asset.

When the Company transfers the rights to receive cash flows from an asset or enters a pass-through arrangement, it evaluates the extent to which it retains the risks and rewards of the ownership of the asset. When the Company neither transfers nor retains substantially all risks and rewards of the ownership of the transferred asset and retains control of the specific asset, then the asset is recognized to the extent of the continuing involvement of the Company in this asset. In this case, the Company also recognizes an associated liability. The transferred asset and the associated liability are measured on a basis reflecting the rights and commitments retained by the Company.

Initial recognition and subsequent measurement of financial liabilities

All financial liabilities are initially recognised at fair value less transaction costs in the case of loans and accounts payable.

Derecognition of financial liabilities

A financial liability is removed when the obligation under the liability is cancelled or expires. When an existing financial liability is replaced by another from the same lender but on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as the derecognition of the original liability and the recognition of a new liability. The difference between the respective carrying amounts is recognized in profit or loss.

Offsetting of financial assets and liabilities

Financial assets and financial liabilities are offset and the net amount is reported in the statement of financial position only when the Company has a legally enforceable right to set off the recognised amounts and intends either to settle on a net basis or to realize the asset and settle the liability simultaneously. The exercise of that right must not be contingent on future events and must be legally enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the company or the counterparty.

5.3.6. Offset of claims and liabilities

Financial assets and financial liabilities may be offset and the net amount presented in the financial statements only when there is legal right to offset and the intention to settle the net amount resulting from the offset or settle the liability simultaneously.

5.3.7. Other long-term receivables

Other long-term receivables may include rent guarantees, guarantees to utilities (telephone, electricity etc.), as well as other long-term amounts. Other long-term receivables are measured at unamortized cost using the effective interest rate method.

5.3.8. Accounts receivable and other trade receivables

Trade receivables are initially recorded at fair value, and subsequently measured at unamortized cost using the effective interest rate method, less any impairment losses. At each reporting date, all overdue or bad debts are evaluated in order to determine whether an allowance for doubtful accounts is necessary. The balance of the specific allowance for doubtful accounts is appropriately adjusted on each closing date of the financial statements in order to reflect the possible relevant risks. Each client balance write-off is charged against the existing allowance for doubtful accounts. It is the policy of the Company that almost no receivable should be written off until all available legal measures for its collection have been exhausted. Trade and other short-term receivables from clients and debtors are usually settled within 60 days for the Company, while in instances of overdue payment no interest is charged to clients.

5.3.9. Cash and cash equivalents

Cash and cash equivalents include cash on hand, sight deposits and short-term (up to 3 months) investments, which can be easily liquidated and entail low risk.

For the purpose of preparing the Statement of Cash Flows, cash balances comprise cash and bank deposits, as well as cash balances as defined above.

5.3.10. Third party balances in ATHEXClear bank accounts

In order to conform with the corporate governance framework laid down by Regulation (EU) 648/2012 of the European Parliament and of the Council (EMIR Regulation), the Company keeps all cash collaterals managed by the Company and relating to the cash market and the derivatives market, as well as its own cash balances, in an account with the Bank of Greece, as a direct participant through the Internet in the Trans-European Automated Real-time Gross Settlement Express Transfer System (TARGET2-GR).

Therefore its own cash balance and the balances of third parties (margins) are deposited in the same account that ATHEXClear maintains with the Bank of Greece, and as a result a separation of the assets is necessary in order for the collateral that ATHEXClear collects to be shown separately in the current assets of 31/12/2021. In the Statement of Financial Position of 31/12/2021, they are shown as equal amounts both in current assets and in current liabilities as “third-party balances in the bank account of the company” and concern exclusively margins in the cash and derivatives markets that were deposited in the bank account held by ATHEXClear with the Bank of Greece as at 31/12/2021 and 31/12/2020 respectively.

5.3.11. Share capital

The share capital includes the common shares of the Company that have been issued and are available for trade. Common shares are included in Equity. Direct costs for the issuance of shares are shown after the deduction of the relevant income tax.

5.3.12. Current and deferred income tax

Current and deferred tax are measured based on the financial statements in accordance with the tax laws in effect in Greece. Income tax is calculated based on the profit of the Company as adjusted in its tax returns, any additional income tax assessed in the tax audits by the tax authorities and from deferred income tax based on the applicable tax rates.

Deferred income tax is determined using the liability method and results from temporary differences between the carrying amount and the tax basis of assets and liabilities.

Deferred tax is not recognized when it results at the time of the initial recognition of an asset or liability in a transaction that does not constitute a business combination and at the time of the transaction does not affect either the accounting or the taxable result (profit/loss).

Deferred tax is determined using the tax rates (and tax laws) enacted or effectively enacted by the date of the financial statements and expected to be implemented when the relevant asset will be recovered or the liability settled.

Deferred tax assets are recognized to the extent that there will be a future taxable gain for the use of the temporary difference that gives rise to the deferred tax asset.

A deferred income tax is determined on the temporary differences resulting from investments in subsidiaries and affiliates, with the exception of the case where the reversal of the temporary differences is controlled by the Company and it is possible that the temporary differences will not be reversed in the foreseeable future.

Deferred tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets and liabilities and when deferred tax assets and liabilities relate to income taxes assessed by the same tax authority either for an entity subject to tax or for other businesses subject to tax, when there is the intention to settle balances on a net basis.

5.3.13. Employee benefits

Short-term benefits

Short-term benefits to employees in cash and in kind are recognized as an expense when they have accrued.

Employee retirement benefits

Employee retirement benefits include both defined contribution plans and defined benefit plans.

Defined contribution plan

Under the defined contribution plan, the (legal) obligation of the Company is limited to the amount that has been agreed to be contributed by the Company to the organization (social security fund) that manages the contributions and grants the benefits (pensions, health care etc.).

The accrued cost of the defined contribution plans is recognized as an expense in the relevant period.

Defined benefit plan

The defined benefit plan of the Company concerns its legal obligation to pay to employees a lump sum at the time they leave service due to retirement.

The liability recorded in the Statement of Financial Position for this plan is the present value of the commitment for the defined benefit in proportion to the accrued right of the employees and in relation to the specific time on which this benefit is expected to be paid.

The present value of the liability for the defined benefit plan is calculated by discounting the future cash outflows using as the discounting rate the rate of long-term corporate bonds of high credit rating that mature within a period approximately equal to the pension plan.

The actuarial gains and losses resulting from the adjustments based on historical data are directly recorded under "Other Comprehensive Income" (note 5.20).

5.3.14. Provisions and contingent liabilities

Provisions are recognized when:

- The Company has a current commitment (legal or inferred) as a result of a past event.
- It is probable that an outflow of resources incorporating financial benefits will be required for the settlement of the commitment and it is possible to measure reliably the amount of the commitment.

Provisions are reviewed at the date of preparation of the financial statements and are adjusted to reflect the best possible estimates and, where deemed necessary, they are discounted at a discounting rate before taxes.

Contingent liabilities are not recognized in the financial statements but are disclosed, unless the probability of an outflow of resources incorporating financial benefits is very low. Contingent assets are not recognized in the financial statements but are disclosed if the inflow of financial benefit is probable.

5.3.15. Revenue Recognition

Revenue includes the fair value of the transactions, net of any recovered taxes, rebates and refunds. Intra-group revenue on consolidation is fully deleted. Revenue is recognized to the extent that it is probable that the economic benefits will flow into the Company and the relevant amounts can be measured reliably.

The Company recognizes income, except interest income, dividends and from any other source resulting from financial instruments (which are recognized according to IFRS 9), to the extent that they reflect the price that the Company is entitled to from the transfer of goods and services based on a five-step approach:

1. Recognition of contracts with customers
2. Recognition of the terms for the performance of the contracts
3. Recognition of the price of the transaction
4. Allocation of the price of the transaction according to the terms for the performance of the contracts
5. Recognition of the income when the Company fulfils the terms for the performance of the contracts.

Customers are invoiced according to the agreed payment schedule and the price is paid at the time of the invoice. When the time of the invoice is different from the time of fulfilment of the performance obligation, the Company recognizes contractual assets and contractual liabilities.

In revenue recognition, the following specific recognition criteria must also be fulfilled:

Revenue from clearing in the stock market

Revenue from clearing is recognized at the conclusion of the transaction and after the relevant clearing and settlement are carried out on the Exchange.

Revenue from derivatives

Revenue from the derivatives market is recognized upon completion of the transaction at the Athens Exchange through ATHEXClear, which is the branch for clearing transactions. Fees for transactions on the derivatives market are collected on the day following settlement.

Revenue from Members (fees)

Fees for transactions on the securities market are collected on the day following settlement or on the third working day of the following month, if the Member submits a relevant request. Fees for the trading of derivatives are collected on the day following settlement. Fees for securities and derivatives are invoiced on a monthly basis.

Technological support services

Revenue from the provision of technological support services is recognized based on the time of completion of the service.

Other services

Revenue from the provision of other services is recognized based on the time of completion of the service.

Interest Income

Interest income is recognized on an accrual basis and with the use of the effective interest rate. When there is indication as to an impairment of the receivables, their carrying amount is reduced to their recoverable amount, which is the present value of the expected future cash flows, discounted at the initial effective interest rate. Next, interest is assessed at the same interest rate on the impaired new carrying amount.

Distribution of dividends

The distribution of dividends to shareholders is recognized directly to Equity, net of any relevant income tax benefit (until the approval of the financial statements), and is recorded as a liability in the financial statements when distribution is approved by the General Meeting of shareholders.

5.3.16. Trade and other liabilities

The balances of suppliers and other liabilities are recognized in the cost associated with the fair value of the future payment for the purchase of services rendered. The trade and other current liabilities are not interest bearing accounts and are usually settled within 60 days by the Company.

5.3.17. Expenses

Expenses are recognized in the Statement of Comprehensive Income on an accrual basis.

5.3.18. Research and development

Expenses for research incurred with the prospect of the Company acquiring new technical knowledge and expertise are recognized in the Statement of Comprehensive Income as an expense when incurred. Development activities require the preparation of a study or plan for the production of new or significantly improved products, services and processes. Development costs are capitalized only when the cost of development can be measured reliably, the product or the process is productive and technically and commercially feasible, financial benefits are expected in the future, and the Company has the intention, and at the same time sufficient resources at its disposal, to complete the development and use or sell the asset.

The capitalization of expenses includes the direct cost of consulting services, direct work and an appropriate portion of overheads. Other development costs are recognized in the Statement of Comprehensive Income as an expense when they occur.

Development costs that have been capitalized are valued at the acquisition cost less accumulated depreciation and accumulated impairment losses.

Subsequent expenditure is capitalized only when it increases the expected future financial benefits embodied in the specific asset to which they relate. All other expenses, including expenses for internally created goodwill and trademarks, are recognized in the Statement of Comprehensive Income. Depreciation is recognized in the Statement of Comprehensive Income using the straight-line method over the estimated useful life of the intangible assets from the date on which they become available for use. The useful life for the current and the comparative period in the capitalization of development costs is 5 years.

The gain or loss arising from the write-off of an intangible asset is defined as the difference between the net proceeds of sale, if any, and the carrying amount of the asset. Such gain or loss is recognized in the Statement of Comprehensive Income when the asset is written off.

5.3.19. Leases

Determining whether a transaction involves a lease is based on the substance of the transaction at the date of conclusion of the relevant contract, i.e. whether the performance of the transaction depends on the use of one or more assets or whether the transaction grants rights of use of the asset. As of 01/01/2019, the new IFRS 16 regarding leases was implemented.

The Company as a lessee:

Instances of leases of assets from third parties, where the Company does not assume all the risks and rewards of ownership of the asset, are treated as operating leases and lease payments are recognized as an expense in the statement of comprehensive income on a straight-line basis over the lease term.

The leases of the Company according to the new IFRS 16, as of 01/01/2019 are treated using the modified retrospective approach.

5.3.20. Significant estimates and judgements by Management

The areas that require a higher degree of judgement and instances in which the assumptions and estimates are significant for the Financial Statements are set forth below:

Provisions for trade and other receivables

Management applies the “simplified approach” of IFRS 9 for the calculation of expected credit losses, according to which the impairment loss provision is calculated based on the expected credit losses over the life of trade receivables (note 5.15).

The Company has recorded an allowance for doubtful accounts in order to cover adequately any loss that may be reliably assessed and arise from such receivables.

Useful lives of tangible and intangible assets - Valuation

Management makes certain estimates regarding the useful life of depreciable assets. These residual useful lives are periodically reassessed in order to estimate whether they continue to be appropriate (note 5.13).

Deferred tax assets

Deferred tax assets are recognized due to unused tax losses to the extent that it is possible that taxable profits will be available in the future in order to be used against such losses. Significant Management judgement is required to determine the amount of deferred tax assets that can be recognized, based upon the likely timing and level of future taxable profits together with the tax planning of the entity.

Employee compensation provision

Liabilities for employee compensation are calculated based on actuarial methods, the use of which requires Management to assess specific parameters, such as the future increase in employee remuneration etc. Management endeavours, at each reporting date when this provision is reviewed, to assess these parameters in the best possible manner (note 5.20).

Contingent liabilities

The existence of contingent liabilities requires from Management making assumptions and evaluative judgements continuously related to the possibility that future events may or may not occur, as well as the effects that those events may have on the activities of the Company (note 5.20).

Capitalization of development costs

Development costs are capitalized only when the cost of development can be measured reliably, the product or the process is productive and technically and commercially feasible, financial benefits are expected in the future, and the Company has the intention, and at the same time sufficient resources at its disposal, to complete the development and use or sell the asset.

The capitalization of the expenses includes strictly the direct costs, the direct work and an appropriate portion of overheads. Development costs that have been capitalized are valued at the acquisition cost less accumulated depreciation and accumulated impairment losses. Subsequent expenditure is capitalized only when it increases the expected future financial benefits embodied in the specific asset to which they relate. Costs are amortized in 5 years (20%).

5.3.21. New standards, amendments to standards and interpretations

New standards, amendments to standards and interpretations: Specific new standards, amendments to standards and interpretations have been issued, which are mandatory for accounting periods beginning on or after 1 January 2021. The assessment of the Group regarding the effect of the implementation of these new standards, amendments to standards and interpretations is set forth below.

Standards and Interpretations mandatory for the current financial year

IFRS 16 (Amendment) “COVID-19 related rent concessions”

The amendment provides lessees (but not lessors) with relief in the form of an optional exemption from assessing whether a rent concession related to COVID-19 is a lease modification. Lessees can elect to account for qualifying rent concessions in the same way as they would if they were not lease modifications.

IFRS 4 (Amendment) “Extension of the temporary exemption from applying IFRS 9”

The amendment defers the set deadline for the temporary exemption in IFRS 4 “insurance Contracts” from applying IFRS 9 “Financial Instruments” so that entities are required to apply IFRS 9 for annual periods beginning on or after 1 January 2023.

IFRS 9, IFRS 39, IFRS 7, IFRS 4 and IFRS 16 (Amendments) “Interest rate benchmark reform – Phase 2”

The amendments complement those issued in 2019 and focus on the effects of the interest rate benchmark reform on a company’s financial statements that arise when a company replaces an interest rate benchmark with an alternative benchmark rate as part of the reform. Specifically, the amendments relate to how a company will account the changes in the contractual cash flows of financial instruments, the changes in hedging relationships and the information to be disclosed.

Standards and Interpretations mandatory for subsequent periods

IFRS 16 (Amendment) "COVID-19 related rent concessions – Extension of the practical expedient" (effective for annual periods beginning on or after 1 April 2021)

The amendment extends by one year the date a lessee is permitted to apply the practical expedient to rent concessions to cover reductions in rents due on or before 30 June 2022. The amendment has not yet been adopted by the European Union.

IFRS 17 "Insurance contracts" and Amendments to IFRS 17 (effective for annual periods beginning on or after 1 January 2023)

IFRS 17 was issued in May 2017, and, together with the Amendments to IFRS 17 issued in June 2020, replaces IFRS 4. IFRS 17 establishes principles for the recognition, measurement, presentation and disclosure of insurance contracts within the scope of the Standard. The objective of IFRS 17 is to ensure that an entity provides relevant information that faithfully represents those contracts. IFRS 17 solves the comparability problems created by IFRS 4, by requiring all insurance contracts to be accounted for in a consistent manner. The obligations associated with insurance contracts will be accounted for using current values, instead of historical cost. The standard has not yet been adopted by the European Union.

IAS 16 (Amendment) "Property, Plant and Equipment – Proceeds before intended use" (effective for annual periods beginning on or after 1 January 2022)

The amendment prohibits an entity from deducting from the cost of property, plant and equipment any proceeds from selling items produced while the entity is preparing the asset for its intended use. It also requires entities to disclose separately the proceeds and costs related with such produced items which are not part of the entity's ordinary activities.

IAS 37 (Amendment) "Onerous contracts – Cost of fulfilling a contract" (effective for annual periods beginning on or after 1 January 2022)

The amendment clarifies that the "cost of fulfilling a contract" comprises the costs directly related to fulfilling that contract and the allocation of other costs that relate directly to its performance. The amendment also clarifies that, before recording a separate provision for an onerous contract, an entity recognises any impairment loss only to assets used solely on that contract, and not used on other contracts.

IFRS 3 (Amendment) "Reference to the Conceptual Framework" (effective for annual periods beginning on or after 1 January 2022)

The amendments updated IFRS 3 with a reference to the Conceptual Framework for Financial Reporting issued in 2018 as to how an entity should determine what constitutes an asset or a liability in a business combination. Also, an exception was added for certain types of liabilities and contingent liabilities assumed in a business combination Finally, it is clarified that an acquirer does not recognize contingent assets acquired in a business combination, as defined in IAS 37, at the acquisition date.

IAS 1 (Amendment) "Classification of liabilities as current or non-current" (effective for annual periods beginning on or after 1 January 2023)

The amendment clarifies that liabilities are classified as either current or non-current depending on the rights that exist at the end of the reporting period. The classification is not affected by the expectations of the entity or events after the reporting date. In addition, the amendment clarifies what IAS 1 means when it refers to the "settlement" of a liability. The amendment has not yet been adopted by the European Union.

IAS 1 (Amendment) "Presentation of Financial Statements" and IFRS Practice Statement 2 "Disclosure of Accounting Policies" (effective for annual periods beginning on or after 1 January 2023)

The amendments require entities to disclose their material accounting policies and provide guidance on how to apply the concept of materiality to accounting policy disclosures. The amendments have not yet been adopted by the European Union.

IAS 8 (Amendment) "Presentation of Financial Statements" and IFRS Practice Statement 2 "Disclosure of Accounting Policies" (effective for annual periods beginning on or after 1 January 2023)

The amendments help entities distinguish changes in accounting estimates from changes in accounting policies. The amendments have not yet been adopted by the European Union.

IAS 12 (Amendments) "Deferred Tax Related to Assets and Liabilities Arising from a Single Transaction" (effective for annual periods beginning on or after 1 January 2023)

The amendments require entities to recognise deferred tax on certain transactions that, on initial recognition, give rise to equal amounts of taxable and deductible temporary differences. This usually applies to transactions such as leases for lessees and restoration obligations. The amendments have not yet been adopted by the European Union.

IFRS 17 (Amendment) "Initial Application of IFRS 17 and IFRS 9 – Comparative Information" (effective for annual periods beginning on or after 1 January 2023)

The amendment is a transition option relating to comparative information about financial assets presented on initial application of IFRS 17. The amendment is aimed at helping entities to avoid temporary accounting mismatches between financial assets and insurance contract liabilities, and therefore improve the usefulness of comparative information for users of financial statements. The amendment has not yet been adopted by the EU.

Annual Improvements to IFRS 2018-2020 (effective for annual periods beginning on or after 1 January 2022)

IFRS 9 "Financial Instruments"

The amendment examines what costs should be included in the 10% test for derecognition of financial liabilities. The relevant costs or fees could be paid either to third-parties or to the lender. According to the amendment, costs or fees paid to third parties will not be included in the 10% test.

IFRS 16 "Leases"

The amendment removed the illustration of payments from the lessor relating to leasehold improvements in Illustrative Example 13 of the standard in order to remove any potential confusion about the treatment of lease incentives.

5.3.22. Rounding

Any differences in amounts in the financial statements and in respective amounts in the notes are due to rounding.

5.3.23. Adjustment of accounts

In the current financial year, adjustment of accounts was made. See note 5.27.

5.4. RISK MANAGEMENT

General – Risk Management Environment

Athens Exchange Clearing House (ATHEXClear) is a subsidiary of the Athens Exchange Group (ATHEX) and operates as a Qualifying Central Counterparty (QCCP)[9] for the clearing of transactions in the securities and derivatives markets of ATHEX and for the purchase of derivatives of the Hellenic Energy Exchange (HEnEx).

[9] In accordance with European directives and regulations CRD/CRR), capital requirements towards *qualifying central counterparties (QCCP)* are significantly lower compared to non-qualifying central counterparties.

ATHEXClear has been authorized in accordance with the European Market Infrastructure Regulation (EMIR)[10] since 2015[11] and holds a clearing license for all European Union markets (EU-wide passport) in the following product categories[12]:

- Securities: shares, stock options, stock-warrants, government and corporate bonds.
- Derivatives: futures and options on shares and equity indices, futures on exchange rates, gold and oil, futures and options on electricity and natural gas indices, lending and repurchase agreements.

Risk Management Committees

- Risk Committee (RC), advisory committee of the Board of Directors on matters of strategy with regard to risk management issues, in accordance with the Regulation (EMIR).
- Default and Crisis Management Committee (DCMC), executive committee of the Board of Directors on matters relating to the day-to-day operation of risk management and the management of default of Clearing Members.

Institutional Framework

The internal and external institutional framework to which ATHEXClear is immediately subject in respect of its obligations regarding risk monitoring and management includes (a) the Risk Management Frameworks approved by the Board of Directors, the Risk Management Methods and the Frameworks for Control and Validation of the Risk Management Models, (b) the Regulations for the Clearing of Book-Entry Securities and Derivative Transactions, (c) the Decisions 1 to 16 of the Board, and (d) the Regulation (EU) 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories (EMIR), as well as the relevant commission delegated regulations (RTS).

Risk Strategy and Risk Management

A key aim of ATHEXClear is the prudent management of the risks arising from the provision of clearing services to its Clearing Members (CM) with the ultimate goal of ensuring its lasting sustainability and the continuation of its activities (going concern approach).

Thus, in accordance with the strategy of ATHEXClear, the level of risk appetite is determined so as to be consistent with its capital adequacy, to satisfy the needs of the market, to reduce the cost for the participants, to maximize benefits from business opportunities but also to ensure the security of the market and the compliance with the regulatory requirements.

ATHEXClear abides by the Principles for Financial Market Infrastructures (PFMI) issued by the Committee on Payment and Settlement Systems (CPSS) and the Technical Committee of the International Organization of Securities Commissions (IOSCO) in April 2021.

ATHEXClear publishes on a quarterly basis quantitative information regarding its activity, following the guidelines of the Committee on Payments and Market Infrastructures (CPMI) and the International Organization of Securities Commissions (IOSCO)[13].

Governance and Organization of the Risk Management Function

The Board of Directors assumes the ultimate responsibility and accountability for the risk management of the Company. Also, the Board determines and documents the appropriate level of risk appetite and the risk capacity of the Company.

At ATHEXClear, the Risk Management Unit operating under the supervision and guidance of the Chief Risk Officer (CRO) is tasked with comprehensively addressing the risks the company faces with the aim of identifying, assessing and ultimately managing such risks. The CRO reports to the Board through the Chairman of the Risk Committee and implements, among other things, the risk management framework, the policies and procedures established by the Board, as well as the decisions of the Board.

---

[10] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32012R0648
[11] Extension of clearing authorization to energy derivatives (28/02/2020): futures on electricity and natural gas indices and options on such futures contracts.
[12] https://www.esma.europa.eu/sites/default/files/library/ccps_authorised_under_emir.pdf
[13] https://www.athexgroup.gr/el/regulated-publication

Each organizational unit of the company is responsible for monitoring and managing potential risks in such a way as to react promptly and effectively in case of occurrence of risk events (mainly for matters of operational risk).

Continuing the endeavour of recent years, in 2021 actions were taken to strengthen the risk management function in order to keep it in line with the EMIR regulation and ensure it adheres to the international best practices (recruitment of more staff, new IT system, process automation etc.).

The organizational structure that supports the risk management function consists of the following:

Board of Directors

The Board has the ultimate responsibility and accountability with respect to the governance of the risk management function of the Company. Specifically, the Board sets, determines and documents an appropriate level of risk appetite and risk capacity of the Company. In addition, the Board and the senior executives ensure that the policies, processes and audits of the Company are consistent with the appropriate level of risk appetite and the risk capacity of the Company and examine how the Company identifies, reports, monitors and manages risks.

Risk Committee

It serves as an advisory committee of the Board, in accordance with the provisions of Article 28 of the EMIR Regulation and in accordance with the specific provisions of the Regulations on Clearing of Transactions on Derivatives and on Securities in Book Entry Form and the decisions of the Board.

Default and Crisis Management Committee

It serves as executive committee of the Board and reports directly to it. The Committee has decisive responsibilities with respect to the day-to-day management of risks, as well as the management of emergency circumstances, such as the intense price volatility in the market or the event of default of a clearing member.

Risk Management Unit (RMU)

It is sufficiently independent from the other departments of the company and its key mission is to address comprehensively the risks that ATHEXClear faces with the aim of identifying, assessing and ultimately managing such risks. The RMU has the necessary authority, the required resources, expertise and access to all information necessary to perform its work.

Chief Risk Officer (CRO)

The CRO reports to the Board of Directors on matters of risk management through the Chairman of the Risk Committee and implements the risk management framework through the policies and procedures established by the Board. As head of the Risk Management Unit, the CRO supervises and leads its Staff in [...]

Organizational Units

These are responsible for the identification and management of the risks that fall within their scope (mainly operational risk).

Specifically, the RMU monitors the risk levels of the company on a continuous basis using the special and approved risk management procedures. The key assumptions, the data sources and the processes used in measuring and monitoring risks are documented and tested for their reliability on a regular basis through the review and audit framework and the validation framework. The main method used for market risk measurement is the Filtered Historical Simulation (FHS) for measuring Value at Risk (VaR) with a level of statistical significance of 0.8% to 1.0%.[14]

A series of tests for counterparty credit risk and liquidity is carried out on a daily basis to determine the adequacy of pre-funded financial resources for each clearing area separately in extreme but reasonable market conditions (stress-tests).

[14] https://www.athexgroup.gr/el/clearing-risk-management

Risk categories

The Company addresses all categories of risks, both internal and external, placing priority on those that have been identified as significant (counterparty credit risk, liquidity and operational risk). It is recognized that each service offered by the Company can expose it to any combination of the risks mentioned below.

The risks to which the Company may be exposed due to the nature of its activities are:

Credit risk

It is defined as the risk of incurring losses, mainly due to default of obligors, primarily arising from equity investments in commercial banks and the existence of balances payable to customers and Clearing Members.

Counterparty credit risk

It is defined as the risk that the company will suffer loss due to default of one or more counterparties.

Market risk

It is defined as the risk that the company will suffer loss due to adverse changes in exchange rates, interest rates, market prices, commodities and volatility as a result of occurrence of counterparty risk.

Liquidity risk

It is defined as the risk that the company will suffer loss due to inadequate liquidity for covering the default of Clearing Members and operational requirements (increased funding cost, failure to meet obligations) and for performing clearing operations.

Operational risk

It is defined as the risk of incurring losses due to deficiency or failure of internal procedures and systems, human factor (errors, fraud) and external events, including legal risk. The risk relating to the security of IT systems, as in most companies, is now beginning to be considered as very important and the appropriate measures are taken for its mitigation. There is an independent Information Security Unit in the Group. The Company has a system and appropriate business continuity processes (BCP). A key characteristic of the Company is the relatively low dependence on outsourced and third-party service providers in respect of performance of its critical functions.

Business risk

It is defined as the risk of realizing lower than expected revenue due to internal or external factors, such as increased competition, adverse economic circumstances (decrease in the volume of stock market transactions, deterioration in the liquidity of domestic and international financial markets), failure to control costs, failure to keep with new technological developments in the business etc.

Market Risk

The Company is exposed to a limited extent to market risk arising from its operating activities and the maturity mismatch of assets and liabilities (interest rate risk), but with the recent change in investment policy (06/2020) this risk is actively managed. Potential loss from market risk may occur in the event of default of a clearing member (counterparty credit risk) as ATHEXClear is required to execute security transactions in order to close out the positions of the defaulting member. In each instance, the Company monitors the possible exposure to market risk and calculates the required pre-funded resources that must be kept against the risk in accordance with the Methodology for Calculating Risk Management Parameters and the Framework for Reviewing Models and Controls. In each instance, the Company does not express any appetite for such risk beyond the specific pre-funded resources of the company in the event of default of a Clearing Member (Regulatory Dedicated Own Resources / Skin in the Game – SIG) in accordance with the Regulation (EMIR).

Credit Risk and Counterparty Risk

ATHEXClear has been granted by the Hellenic Capital Market Commission a licence to manage and operate systems for clearing trades on dematerialized securities and on derivatives. In this capacity, ATHEXClear bears the risk of default by the Clearing Members on their obligations to clear and settle trades, as described in the Rulebooks (counterparty credit risk). In addition, as of 22 January 2015 ATHEXClear has been licensed as a Central Counterparty under the EMIR Regulation and is required to comply with the provisions of the European regulation and the relevant regulatory technical standards (EMIR and EMIR-RTS).

The company has established and makes use of several mechanisms and financial resources to manage and cover the risks it assumes and to ensure the orderly operation of the system in general in connection with the scope and scale of the transactions, the clearing of which it has undertaken. The mechanisms that ATHEXClear implements are described in the "Regulation for the Clearing of Book-Entry Securities Transactions", in the "Regulation for the Clearing of Derivative Transactions" and in the relevant decisions of the Board.

In order to obtain the status of a Clearing Member, the Investment Services Company or the Credit Institution must fulfil specific minimum requirements of financial and operational adequacy, which are laid down in the Clearing Rulebooks and which must be continuously satisfied during the entire membership in ATHEXClear.

Both for the cash market and for the derivatives market, ATHEXClear clears transactions assuming the role of Central Counterparty. To cover the risk with respect to its Clearing Members, ATHEXClear monitors and calculates on a daily basis (on an end-of-day as well as on an intraday basis, almost in real time) margins for each clearing account of the Clearing Members and blocks any additional guarantees in the form of cash and/or securities (minimum margin cover of 40%). In addition, it manages the Clearing Funds of the two markets, which function as risk sharing funds and to which Clearing Members contribute exclusively in cash. Based on the margins that have been blocked, the credit limits extended to members are continuously reviewed, and the compliance with the credit limits is monitored in real time during the trading session. The minimum amount of the Clearing Funds is updated at least monthly in accordance with the provisions of the regulation, so as to be adequate at the very least to cover at any time the requirements laid down by EMIR (Cover 1 & 2), i.e. to absorb losses in excess of the margins in the event of default of at least the two (2) groups of Clearing Members with respect to which ATHEXClear would incur the largest loss from closing out their positions in extreme but reasonable market conditions for each separate market (securities, derivatives).

The risk management models and the parameters used are examined as to their effectiveness on a daily basis and in extreme but possible scenarios (Margin/Haircut Back-Testing, Parameter Sensitivity Analysis etc.), while on an annual basis the results are reviewed and the analysis is presented to the Risk Committee. In addition, the models are validated on an annual basis by an independent specialized consultant (model validation) and the report prepared is filed with the Hellenic Capital Market Commission.

As part of the Investment Policy, specific principles are defined regarding the arrangements for the investment of cash balances of the company and of the clearing members. The liquid assets of the Company that can be deposited in systemic commercial banks concern up to two thirds (2/3) of the difference between equity and the minimum capital requirements, while the remaining cash and the pre-funded resources of the Clearing Members (Clearing Fund shares and cash to cover margins) are deposited exclusively with the Bank of Greece (TARGET 2), a fact that minimizes the exposure of the Company to credit risk. The liquid assets of ATHEXClear deposited with commercial banks are not taken into account for covering capital requirements and Cover 1 & 2.

ATHEXClear maintains specific pre-funded funds separately for each clearing fund (SIG), for absorbing losses in the event of default of a Clearing Member before making uses of the clearing funds.

Liquidity Risk

The liquidity risk to which ATHEXClear is exposed arises from its business activity and its operation as a central counterparty.

The aim of ATHEXClear is to maintain an adequate level of liquidity to ensure that it is in a position to fulfil its obligations concerning payments or settlements in all relevant currencies that become payable at the end of each day or, if required, on an intraday basis. The liabilities are assessed based both on its business plan and on possible but unforeseen events (e.g. default of a Clearing Member).

The available liquidity of ATHEXClear is reviewed in relation to the criteria established by EMIR. On a daily basis but also in extreme but plausible scenarios of extreme market conditions it is examined whether the liquid assets are sufficient to cover the default of the two (2) groups of Clearing Members in respect of which the Company has the highest liquidity requirement for closing out their positions for each separate market (securities, derivatives). In addition, the projected liquidity gaps for the entire Company are monitored through liquidity gap analysis on a daily basis.

Operational Risk

The Company does not seek to undertake operational risk but accepts that operational risk may arise as a result of system failure, internal procedures, human error or external events. Specifically, it is recognized that operational risk may arise, among other things, because of: outsourcing, matters of supervisory and regulatory compliance, business continuity, IT systems and information security risks and project implementation risks.

Operational risk is maintained at acceptable levels, through a combination of proper corporate governance and risk management, robust systems and audits.

In 2021 there were no significant instances of interruption of the clearing and/or risk management operations due to failure or unavailability of IT systems or to human error. There were no losses or monetary claims arising from litigation (legal and court expenses), from non-compliance with the supervisory framework and the contractual obligations of the Company or from external events.

Measures to mitigate operational risk

The Company recognizes the need to determine, assess, monitor and reduce operational risk inherent in its operations and activities, as well as the need to maintain adequate funds, in order to be able to deal with this specific category of risk.

In accordance with the EMIR Regulation, the capital requirement for operational risk is calculated using the Basic Indicator Approach (BIA) and in addition a framework has been established for the systematic monitoring and management of operational risk.

The most significant measures for reducing operational risk are the implementation of a business continuity plan for all critical services of the Group, the purchase of insurance policies, as well as measures to ensure compliance with the new regulations. The Company has an operational risk management framework setting out the policies and procedures for the management of operational risks, uses a specific system for the management of operational risk management, according to which ATHEXClear performs on a regular basis an RCSA[15] for the assessment and classification of risks, maintains a loss database[16], prepares regular reports and plans actions to improve risk management.

Business Risk

The Company recognizes that the occurrence of business risk can be caused by both internal and external factors. The adverse international and domestic economic environment, the changes in tax laws, the development of the regulatory environment and the structural changes in the microeconomic environment of companies operating in the wider sector of capital markets (buy/sell side) and of financial market infrastructure (FMI) companies, as well as the technological developments in the business, may intensify competition. Such events may have an impact on the growth and sustainability of the Company causing a decrease in the clearing activity and expected profits, inability to liquidate assets and/or impairment of their value etc.

The Company and, in general, the Group monitor continuously and systematically the developments and adapt to the emerging environment. The strategy of differentiation of the mix of products cleared by the Company, as well as the geographic dispersion of the Clearing Members and of the markets in which the Company operates, contribute among other things to the mitigation of this risk.

Specifically, for ATHEXClear, in accordance with the EMIR Regulation, the capital requirement for business risk is calculated on an annual basis.

Business Continuity Plan

The Athens Exchange Group has developed and put into operation appropriate infrastructures and a disaster recovery plan. ATHEXClear, as a member of the Group, is covered by this plan, which includes:

- *Operation of a Disaster Recovery Site:* The Athens Exchange Group maintains a disaster recovery site for its IT systems. In addition, the Group has received and maintains the ISO-22301 business continuity certification.
- *Formation of crisis management and emergency incident management teams:* The purpose of these teams is to maintain continuity in the provision of trading services in case of an unforeseen event. Specific responsibilities have been defined and assigned to specially trained executives of the Group.

---

[15] Risk Control Self-Assessment (RCSA): at regular intervals ATHEXClear organizes workshops with the objective of classifying the risks according to the degree of danger at the level of procedures and determining Key Risk Indicators (KRIs).
[16] Loss Database: the database is updated on a daily basis with operational risk events regardless of the extent of the loss.

- *Existence of back up IT systems:* The IT systems of the Athens Exchange Group have been installed and operate in the data centre at the headquarters of the Group. The data centre consists of two mirror – separate – data centres, independent as to their location, support facilities and technological services provided, to provide redundancy and high availability, ensuring the uninterrupted operation of the systems.

5.5. CAPITAL MANAGEMENT

The primary aim of the capital management of the Company is to maintain its high credit rating and sound capital ratios, in order to support and expand the activities of the Company and maximize shareholder value.

There were no changes in the approach adopted by the Company with respect to capital management during the financial year 2021.

5.6. POST-TRADING SERVICES

Revenue from post-trading services in 2021 came to €8,728 thousand compared to €8,602 thousand in 2020, showing an increase of 1.5%. Revenue from post-trading services primarily concerns Shares, Derivatives, Other Funds (Regulated Market Notification Instructions, Transfers-Allocations and Bonds) and member subscriptions.

The total revenue from post trading services is broken down in the following table:

	31/12/2021	31/12/2020
Share Clearing	6,938	6,342
Clearing of Others	340	733
Derivative Clearing	1,325	1,401
Member Subscriptions	125	126
Total	**8,728**	**8,602**

Certain amounts of the previous financial year have been modified (see note 5.27).

5.7. ANCILLARY SERVICES

Revenue from ancillary services in 2021 came to €134 thousand compared to €168 thousand in 2020, showing an increase of 20%. Revenue from ancillary services primarily concerns revenues from LEI - EMIR TR and SFTR services, as well as from support of other markets and miscellaneous revenues.

The total revenue from other services is broken down in the following table:

	31/12/2021	31/12/2020
LEI - EMIR TR - SFTR Services	91	107
Support of Other Markets	41	40
Other	2	21
Total	**134**	**168**

Certain amounts of the previous financial year have been modified (see note 5.27).

(Amounts in thousands euro, unless otherwise noted) 45

5.8. PERSONNEL REMUNERATION AND EXPENSES

Personnel remuneration and expenses in 2021 amounted to €863 thousand compared to €1,112 thousand in the same period last year, recording a decrease of 22.4%. The number of employees as at 31/12/2021 was 23 persons, remaining unchanged compared to the number of employees on 31/12/2020.

Total personnel remuneration and expenses are broken down in the following table:

	31/12/2021	31/12/2020
Personnel remuneration	582	770
Other benefits	119	121
Employer contributions	157	176
Severance payments to employees	0	40
Employees Actuarial Study	5	5
Total	**863**	**1,112**

In the financial year the employee bonus was transferred to employee remuneration.

5.9. THIRD PARTY FEES AND EXPENSES

Third party fees and expenses concern the remuneration of members of the Board of Directors, fees of certified public accountant and fees to consultants.

Total third party fees are broken down in the following table:

	31/12/2021	31/12/2020
Fees to consultants	146	94
Remuneration of members of the Board of Directors and committees	35	47
Fees to auditors	20	20
Total	**201**	**161**

In the financial year the amount of other fees was transferred to the remuneration of members of the Board of Directors and committees.

5.10. SETTLEMENT FEE

The cost of the annual settlement fee came to the amount of €5,571 thousand compared to €5,071 thousand in the same period last year, recording an increase of 9.9% The amount concerns the calculation of the flat annual settlement fee for 2021.

For the period 01/01/2021 to 11/04/2021, the calculation was performed in accordance with Article 1, paragraph 1(a) of the Regulatory Decision 1 on "Dematerialized Securities System Management and Operation Fees" of ATHEXCSD. According to a decision of the Board of Directors of ATHEXCSD, as of 01/01/2017 the flat annual settlement fee is calculated at 60% of the revenues resulting in the clearing house from the clearing of transactions, with a minimum amount of €3.0 million and a maximum amount of €15.0 million payable annually.

(Amounts in thousands euro, unless otherwise noted) 46

As of 12/04/2021, according to the Decision 18 of the Board of Directors of ATHEXCSD, the flat fee is set at €2,000,000 per annum and concerns the use of multilateral and monetary settlement mechanisms. There are additional fees for settlement instructions that the Depository receives from Operators of Market Infrastructures and which are settled either multilaterally or bilaterally, as well as fees for each securities lending trade by the Depository relating to securities financing transactions.

5.11. OTHER OPERATING EXPENSES

Other operating expenses in the financial year 2021 reached €346 thousand compared to €403 thousand in the same period last year, recording a decrease of 14.1%. This category mainly includes support services provided to ATHEXClear by other Companies of the Athens Exchange Group, which are presented in detail in the following table:

	31/12/2021	31/12/2020
Support operation services	153	176
LEI - EMIR TR - SFTR	138	166
Rents	15	15
Subscriptions	24	23
Other expenses	16	23
Total	**346**	**403**

Certain amounts of the previous financial year have been modified (see note 5.27).

5.12. HELLENIC CAPITAL MARKET COMMISSION FEE

The Fee (contribution) to the Hellenic Capital Market Commission, pursuant to the provisions of the Ministerial Decision 54138/B 2197, Government Gazette 1913/09.12.2010, came to €708 thousand for 2021 compared to €670 thousand for the previous accounting period. The increase in this fee is due to the increase in the value of clearing on which it is calculated.

5.13. TANGIBLE ASSETS FOR OWN USE AND INTANGIBLE ASSETS

The tangible (property, plant and equipment) and intangible assets of the Company as at 31/12/2021 and 31/12/2020 are broken down as follows:

ATHEXClear	Furniture and fixtures	Total
Acquisition and valuation value as at 31/12/2019	**732**	**732**
Additions for 2020	120	120
Acquisition and valuation value as at 31/12/2020	**852**	**852**
Accumulated depreciation as at 31/12/2019	**480**	**480**
Depreciation and amortization for 2020	75	75
Accumulated depreciation as at 31/12/2020	**555**	**555**
Undepreciated value		
as at 31/12/2019	**252**	**252**
as at 31/12/2020	**297**	**297**

(Amounts in thousands euro, unless otherwise noted) 47

ATHEXClear	Furniture and fixtures	Total
Acquisition and valuation value as at 31/12/2020	**852**	**852**
Additions for 2021	105	105
Acquisition and valuation value as at 31/12/2021	**957**	**957**
Accumulated depreciation as at 31/12/2020	**555**	**555**
Depreciation for 2021	128	128
Accumulated depreciation as at 31/12/2021	**683**	**683**
Undepreciated value		
as at 31/12/2020	**297**	**297**
as at 31/12/2021	**275**	**275**

ATHEXClear	INTANGIBLE ASSETS		
	Internally generated intangible assets	Software	Total
Acquisition and valuation value as at 31/12/2019	**242**	**760**	**1,002**
Additions for 2020	76	348	424
Acquisition and valuation value as at 31/12/2020	**318**	**1,108**	**1,426**
Accumulated amortization as at 31/12/2019	**41**	**273**	**314**
Amortization for 2020	52	179	231
Accumulated amortization as at 31/12/2020	**93**	**452**	**545**
Unamortized value			
as at 31/12/2019	**201**	**487**	**688**
as at 31/12/2020	**225**	**655**	**881**

ATHEXClear	INTANGIBLE ASSETS		
	Internally generated intangible assets	Software	Total
Acquisition and valuation value as at 31/12/2020	**318**	**1,108**	**1,426**
Additions for 2021	79	118	197
Acquisition and valuation value as at 31/12/2021	**397**	**1,226**	**1,623**
Accumulated depreciation as at 31/12/2020	**93**	**452**	**545**
Amortization for 2021	68	207	275
Accumulated amortization as at 31/12/2021	**161**	**659**	**820**
Unamortized value			
as at 31/12/2020	**225**	**655**	**882**
as at 31/12/2021	**236**	**566**	**804**

5.14. LEASES

Amounts recognized in the Statement of Financial Position:

Right-of-use assets	**31/12/2021**	**31/12/2020**
Property	366	402
	366	**402**
Lease liabilities		
Non-current lease liabilities	355	387
Current lease liabilities	32	31
	387	**418**

(Amounts in thousands euro, unless otherwise noted) 48

Amounts recognized in the Statement of Comprehensive Income:

Amortization of Rights of Use	2021	2020
Property	36	36
	36	**36**

For the financial year 2021, lease interest was estimated at €16 thousand and total lease payments in the period amounted to €46 thousand.

5.15. ACCOUNTS RECEIVABLE AND OTHER RECEIVABLES

All receivables are short-term and, therefore, no discounting is required as at the date of the Statement of Financial Position. The breakdown of accounts receivable and other receivables is shown in the following table:

	31/12/2021	31/12/2020
Accounts receivable	507	917
Less: allowance for doubtful accounts	(8)	(13)
Net trade receivables	**499**	**904**
Other receivables		
Prepaid non-accrued expenses	54	91
Sundry debtors	4	0
Total	**58**	**91**

The carrying amount of the above receivables as at 31/12/2021 represents their fair value.

The change in the allowance for doubtful accounts is broken down as follows:

Allowance for doubtful accounts	
Balance as at 31/12/2019	**6**
Additional provision in 2020	7
Balance as at 31/12/2020	**13**
Decrease of provision in 2021	(5)
Balance as at 31/12/2021	**8**

The following table shows in detail the total accounts receivable

COMPANY	31/12/2021	31/12/2020
Balances not past due	501	910
Past due balances	6	6
Before provisions	**507**	**916**
Less: provisions for impairment	(8)	(13)
After provisions	**499**	**904**

The aging analysis for past due accounts receivable is as follows:

(Amounts in thousands euro, unless otherwise noted) 49

COMPANY	31/12/2021	31/12/2020
Up to 120 days	0	0
121-240 days	0	0
241-360 days	0	0
More than 360 days	4	6
Before provisions	**4**	**6**

The Company implements the simplified approach of IFRS 9 and calculates the expected credit losses over the entire lifetime of trade receivables.

On the date of the Statement of Financial Position, the Company performs an impairment test on trade receivables using a table according to which the expected credit losses are calculated.

The maximum exposure to credit risk on the date of the Statement of Financial Position is the carrying amount of each category of trade receivables as shown above.

The following table presents information regarding the exposure of the Company to credit risk.

COMPANY	Not past due	Up to 120 days	121-240 days	241-360 days	More than 360 days
Expected loss ratio	0.4%	0.0%	0.0%	0.0%	100.0%
Total accounts receivable	501	0	0	0	4
Expected loss	2	0	0	0	4

The trade and other receivables are not interest bearing accounts and are usually settled within 60 days for the Company.

5.16. OTHER LONG-TERM RECEIVABLES

Other long-term receivables for 2021 and 2020 are broken down in the following table:

	31/12/2021	31/12/2020
Withholding tax on dividends to be offset (1)	300	300
Rental guarantees	2	2
Total	**302**	**302**

Athens Exchange Clearing House S.A. in the period 2009-2013 earned revenue from its participation (dividends) in subsidiaries. In the distributions made, tax on dividends was withheld, the amount of which is recorded in an account of receivables from the Greek State to be offset against tax on dividends from further distribution of this income to the shareholders of the Companies. In the absence of an express provision in the Income Tax Code regarding offset or refund of this receivable from the Greek State, the Company records this amount in long-term receivables.

The receivable is recognized as a tax asset under IAS 12, consisting of withholding tax on dividends in accordance with the standard and calculated at the total amount expected to be recovered from the tax authorities. The Company measures current tax assets both initially and subsequently at the amount expected to be recovered from the tax authorities. Management considers that there is no risk of not recovering the tax asset.

(Amounts in thousands euro, unless otherwise noted) 50

5.17. THIRD PARTY BALANCES IN ATHEXClear BANK ACCOUNT (COLLATERAL)

The cash balances of ATHEXClear concerning collateral of the Clearing Members in the form of cash, as well as the cash of the Clearing Fund, are deposited in an account that ATHEXClear holds at the Bank of Greece as a Direct Participant in TARGET2.

The amount of €238.497 thousand, which is broken down below and is shown in the Statement of Financial Position of 31/12/2021 both in assets and in liabilities, concerns collateral of Members of the derivatives and securities markets deposited in the bank account that ATHEXClear holds at the Bank of Greece, managed by ATHEXClear, and an amount of €35 thousand is deposited in a commercial bank account and concerns inactive customer balances of the Clearing Fund.

The implementation of the new model in the securities market in accordance with Regulation (EU) No. 648/2012 concerning the Clearing Fund and Member margins for the securities market went into effect on 16/02/2015.

	31/12/2021	31/12/2020
Securities Market Clearing Fund Collateral	15,662	15,794
Additional Securities Market Clearing Fund Collateral	155,110	143,275
Derivatives Market Clearing Fund Collateral	11,661	8,734
Additional Derivatives Market Clearing Fund Collateral	56,029	53,028
Clearing Fund Inactive Customer Balances	35	35
Total	**238,497**	**220,866**

5.18. CASH AND CASH EQUIVALENTS

The cash balances of the Company are placed in short-term interest bearing investments with the aim to maximize the benefits, always in accordance with the investment policy of the Company.

As of 26/11/2014 the cash balances of ATHEXClear are kept in accounts with the Bank of Greece, in accordance with the investment policy of the Company and the provisions of Article 45 of Regulation (EU) No. 153/2013. The aforementioned policy excludes an amount not exceeding €500 thousand, which is held at commercial banks and used exclusively for the daily operational needs of ATHEXClear, and an amount up to 2/3 of the surplus capital adequacy resulting from the formula (Surplus Capital Adequacy = Total Equity - Capital Requirements).

It is noted that deposits with the Bank of Greece have a negative interest rate of 0.5% from 18/09/2019 onwards.

As a result of the above charge on deposits with the Bank of Greece, the Company incurred in 2021 a cost of €110 thousand (€16 thousand relate to IFRS 16) compared to €137 thousand (€17 thousand relate to IFRS 16) in the same period last year.

The breakdown of the cash balances of the Company is as follows:

	31/12/2021	31/12/2020
Deposits at the Bank of Greece	13,576	13,353
Sight deposits in commercial banks	276	234
Term Deposits < 3-month	0	12,920
Cash in hand	2	2
Total	**13,854**	**26,509**

(Amounts in thousands euro, unless otherwise noted) 51

5.19. SHARE CAPITAL AND RESERVES

a) Share capital

The share capital of the Company amounted to €12,920,000 consisting of 8,500,000 registered common shares of a nominal value of €1.52 each. The share capital of the Company was reduced by an amount of €12,580,000 through the reduction of the nominal value of each share by €1.48 and payment of the corresponding amount to the parent company.

b) Reserves

These concern the legal reserve of the Company. In the financial year a legal reserve of €23 thousand was created from the profit of the financial year 2020.

c) Retained earnings

Retained earnings amounting to €1,866 thousand as at 31/12/2020 were increased by an amount of €306 thousand (representing comprehensive income for 2021) less the creation of a legal reserve of €23 thousand and the payment of dividends to the parent company amounting to €420 thousand, resulting in retained earnings as at 31/12/2021 amounting to €1,728 thousand.

d) Capital requirements

According to the EMIR Regulation, Article 45 of Regulation (EU) No. 648/2012, a clearing house must maintain lines of defence (default waterfall) in case of default of a member.

According to Article 35 of the technical standards for clearing houses, the amount of own resources of central counterparties used in a default waterfall is specifically calculated as follows:

- The central counterparty keeps and indicates separately an amount of dedicated own resources for the purposes set out in Article 45, paragraph 4 of Regulation (EU) No. 648/2012.
- The central counterparty calculates the minimum amount referred to in paragraph 1 by multiplying the minimum capital, including retained earnings and reserves, held in accordance with Article 16 of Regulation (EU) No. 648/2012 and Commission Delegated Regulation (EU) No. 152/2013 (1) by 25%.

The central counterparty revises this minimum amount on an annual basis.

Based on the above, ATHEXClear as a recognized clearing house prepared in cooperation with consultants a report on “Methodology for the Calculation of Capital Requirements”, describing the methodology applied in order to assess the capital requirements for credit risk, counterparty risk, market risk, business interruption risk, operational risk and business risk. The method applied was based on the following:

- Regulations (EU) 648/2012 and (EU) 152/2013 and (EU) 153/2013
- Regulation (EU) 575/2013
- FSA: Prudential sourcebook for Banks, Building Societies and Investment Firms
    - BIRBU 13,4 CCR mark to market method
    - BIRBU 5,4 Financial collateral
    - BIRBU 3 Standardized credit risk

ATHEXClear regularly calculates on a quarterly basis and presents in its financial reports and annual financial statements the capital requirements that are necessary in order for the Company to be able to meet its regulatory obligations.

ATHEXClear implements procedures for the identification of all sources of risk that may affect its current operations and examines the probability of potential adverse effects on its revenue or expenses and the size of its capital.

The capital requirements of ATHEXClear as at 31/12/2021 are broken down in the following table:

Capital Requirements (Euro '000) Type of Risk	Capital Requirements on 31/12/2021
Credit risk (total)	182
Derivatives Market	
Securities Market	0
Investment of Own Assets	182
Market Risk	0
Exchange Rate Risk	0
Operational Risk	191
Business Interruption Risk	3,929
Business Risk	1,965
Total Capital Requirements	**6,267**
Notification Threshold (110% of the above Capital Requirements)	6,894
Additional Special Resources (25% of Capital Requirements as at 31/12/2021)	**1,567**

The capital requirements as calculated above are significantly lower than the amount of equity shown in the Statement of Financial Position of the Company of 31/12/2021 adjusted with the amount of cash balances kept outside the Bank of Greece.

Of the additional special resources of €1,567 thousand, calculated as above and remaining constant in 2021, 57.32% (€898 thousand) is allocated to the securities market and 42.68 % (€669 thousand) is allocated to the derivatives market as at 31/12/2021.

5.20. PROVISIONS

In May 2021, a decision was published by the IFRS Interpretations Committee (IFRIC) regarding IAS 19 Employee Benefits and specifically with respect to how the accounting principles and the requirements of the International Accounting Standards are applied in the allocation of benefits to periods of service, based on a specific question and facts provided regarding a defined benefit plan.

The IFRS Interpretations Committee (IFRIC) arrived at the conclusion that, as regards the defined benefit plan relating to the specific question and the facts included in its decision, the entity attributes retirement benefits to each year in which the employee renders service in the last working years before retirement, taking into account the maximum period beyond which the benefit is not further increased (16 years of service), until retirement age. As the compensation policy of the Company specifies requirements and conditions different from those included in the above decision, benefits are distributed during the first years of service of the employee up to the maximum period beyond which the benefit is not further increased and, therefore, this decision had no effect on the calculation of the provision for employee compensation.

The following table shows in detail the provisions of the Company as at 31/12/2021 and 31/12/2020.

	31/12/2021	31/12/2020
Post-employment compensation	182	191
Post-employment compensation	**182**	**191**

(Amounts in thousands euro, unless otherwise noted) 53

	31/12/2021	31/12/2020
Other provisions	20	20
Total other provisions	**20**	**20**

Obligations to employees

The changes in obligations to employees as at 31/12/2021 are shown in detail in the following table:

Accounting Presentation in accordance with the amended IAS 19 (amounts in €)	**Company**	
	31/12/2021	**31/12/2020**
Amounts recognized in the Statement of Financial Position		
Present value of liabilities	181,769	191,418
Net liability recognized in the Statement of Financial Position	**181,769**	**191,418**
Amounts recognized in the Profit & Loss Account		
Cost of current employment	4,050	2,651
Net interest on the liability/(asset)	842	1,488
Regular expense in the Profit & Loss Account	**4,892**	**4,139**
Recognition of past service cost	0	1,166
Total expense in the Profit & Loss Account	**4,892**	**5,305**
Change in the present value of the liability		
Present value of liability at the beginning of the year	191,418	154,972
Cost of current employment	4,050	2,651
Interest expense	842	1,488
Past service cost during the period	0	1,166
Actuarial loss/(gain) - financial assumptions	(17,786)	16,296
Actuarial loss/(gain) - demographic assumptions	711	0
Actuarial loss/(gain) - experience for the period	2,534	14,845
Present value of the liability at the end of the period	**181,769**	**191,418**
Adjustments		
Adjustments to liabilities due to change in assumptions	17,075	(16,296)
Experience adjustments in liabilities	(2,534)	(14,845)
Total actuarial gain/(loss) in Equity	14,541	(31,141)
Total amount recognized in Equity	**14,541**	**(31,141)**
Changes in net liability recognized in the Statement of Financial Position		
Net liability at the beginning of year	191,418	154,972
Total expense recognized in the Profit & Loss Account	4,892	5,305
Total amount recognized in Equity	(14,541)	31,141
Net liability at the end of the year (5.26)	**181,769**	**191,418**

The actuarial assumptions used in the actuarial valuation in accordance with IAS 19 are as follows:

Actuarial assumptions	**Valuation date**	
	31/12/2021	**31/12/2020**
Discount rate	0.96%	0.44%
Increase in salaries (long term)	1.00%	1.00%
Inflation rate	1.00%	1.00%
Mortality	EVK 2000 (Swiss table)	EVK 2000 (Swiss table)
Personnel turnover rate	0.50%	0.50%
Normal retirement age	Retirement terms established by the social security fund of the employee	Retirement terms established by the social security fund of the employee
Duration of liabilities	16.20	17.28

(Amounts in thousands euro, unless otherwise noted) 54

5.21. ACCOUNTS PAYABLE AND OTHER LIABILITIES

All liabilities are short-term and, therefore, no discounting is required as at the date of the financial statements. The breakdown of accounts payable and other liabilities is shown in the following table:

	31/12/2021	31/12/2020
Accounts payable	98	378
Group Suppliers (1)	0	331
Hellenic Capital Market Commission Fee (2)	321	299
Accrued third party services	148	18
Fees payable (3)	57	179
Sundry creditors	18	18
Total	**642**	**1,223**

1. The amount of liabilities to the companies of the Group as at 31/12/2020 includes an amount of €331 thousand relating to liabilities from intra-group transactions in 2020 due by ATHEXClear to ATHEXCSD, which was paid up within 2021.
2. The Hellenic Capital Market Commission Fee (€295 thousand) is calculated on the value of stock market transactions in the securities and derivatives markets and is paid to the Hellenic Capital Market Commission within two months of the end of each six-month period. The above mentioned amount concerns the second half of 2021.
3. It primarily concerns a personnel bonus provision of €52 thousand for 2021. In the financial year 2020, an employee compensation provision of €40 thousand and a personnel bonus provision of €139 thousand for 2021 had been recorded.

The carrying amount of the above liabilities represents their fair value.

5.22. CURRENT INCOME TAX AND INCOME TAX PAYABLE

The Management of the Company, based on the possibilities offered by tax law, plans its policy so as to minimize its tax obligations. On this premise, it has been presupposed that the profit for the year realized by the Company will be distributed to tax-free reserves at the maximum allowable amount.

Non-deductible expenses mainly include provisions, various expenses, as well as amounts that the Company considers that cannot be justified as productive expenditure in a potential tax audit and which are adjusted by Management at the calculation of the income tax.

Income Tax Expense	31/12/2021	31/12/2020
Income tax	145	165
Deferred Tax	(4)	(10)
Income Tax Expense	**141**	**155**

The reconciliation of the income tax with profit before tax on the basis of the applicable rates and the tax expense is as follows:

(Amounts in thousands euro, unless otherwise noted) 55

Income Tax	31/12/2021	31/12/2020
Profit before tax	435	630
Income tax rate	22%	24%
Expected tax expense	96	151
Tax effect of non-taxable income	(30)	(17)
Tax effect of non-deductible expenses	73	21
Effect of change in tax rate	3	0
Income tax expense	**141**	**155**

Tax liabilities	31/12/2021	31/12/2020
Liabilities/(Assets) 31/12	(146)	60
Income Tax Expense	145	165
Taxes paid	(47)	(377)
Refund of income tax prepayment for the year 2019	0	6
Liabilities/(Assets)	**(48)**	**(146)**

Tax Compliance Report

For the financial years 2011 to 2015, the Greek Sociétés Anonymes and Limited Liability Companies, the annual financial statements of which are subject to statutory audit, are required to obtain an “Annual Certificate” in accordance with paragraph 5 of Article 82 of Law 2238/1994 and Article 65A of Law 4174/2013, which is issued upon the completion of a tax audit conducted by the Statutory Auditor or Audit Firm auditing the annual financial statements. Upon the completion of the tax audit, the Statutory Auditor or Audit Firm issues to the company a “Tax Compliance Report” and, subsequently, submits this report by electronic means to the Ministry of Finance.

From 2016 onwards the issuance of the “Annual Certificate” is optional. The tax authority reserves the right to conduct a tax audit within the statutory framework, as set out in Article 36 of Law 4174/2013.

The Company has been audited for the financial year 2011 by PricewaterhouseCoopers S.A. and for the financial years 2012-2016 by Ernst & Young S.A. and has obtained unqualified “Tax Compliance Reports” in accordance with the applicable provisions (Article 82, paragraph 5 of Law 2238/1994 for the financial years 2011-2013 and Article 65A of Law 4174/2013 for the financial years 2014-2015).

For the financial years 2017 to 2020 the tax audit has been performed by PricewaterhouseCoopers S.A. in accordance with Article 65A of Law 4174/2013 and the company has obtained unqualified “Tax Compliance Reports”.

For the financial year 2021 the tax audit is currently conducted by PricewaterhouseCoopers S.A. in accordance with Article 65A of Law 4174/2013. Management does not expect that any significant tax liabilities will result after the completion of the tax audit other than those recognized and presented in the financial statements.

5.23. RELATED PARTY DISCLOSURES

The intra-group balances as at 31/12/2021 and 31/12/2020, as well as the intra-company transactions of the Companies of the Group as at 31/12/2021 and 31/12/2020, are broken down as follows:

(Amounts in thousands euro, unless otherwise noted) 56

INTRA-GROUP BALANCES (in €) 31/12/2021				
		ATHEX	ATHEXCSD	ATHEXClear
ATHEX	Receivables	0	72,711	0
	Payables	0	28,707	1,925
ATHEXCSD	Receivables	28,707	0	0
	Payables	72,711	0	8,781
ATHEXClear	Receivables	1,925	8,781	0
	Payables	0	0	0

INTRA-GROUP BALANCES (in €) 31/12/2020				
		ATHEX	ATHEXCSD	ATHEXClear
ATHEX	Receivables	0	416,019	720
	Payables	0	34,267	0
ATHEXCSD	Receivables	34,267	0	331,075
	Payables	416,019	0	1,600
ATHEXClear	Receivables	0	1,600	0
	Payables	720	331,075	0

INTRA-GROUP REVENUE-EXPENSES (in €) 31/12/2021				
		ATHEX	ATHEXCSD	ATHEXClear
ATHEX	Revenue	0	451,852	74,528
	Expenses	0	603,235	0
	Dividend income	0	3,210,400	420,000
ATHEXCSD	Revenue	603,235	0	6,870,665
	Expenses	451,852	0	727
ATHEXClear	Revenue	0	727	0
	Expenses	74,528	6,870,665	0

INTRA-GROUP REVENUE-EXPENSES (in €) 31/12/2020				
		ATHEX	ATHEXCSD	ATHEXClear
ATHEX	Revenue	0	449,481	109,822
	Expenses	0	427,502	0
	Dividend income	0	4,013,000	3,825,000
ATHEXCSD	Revenue	427,502	0	6,054,805
	Expenses	449,481	0	16,247
ATHEXClear	Revenue	0	16,247	0
	Expenses	109,822	6,054,805	0

Intra-group transactions relate to a flat settlement fee, which in the period 01/01/2021-11/04/2021 was calculated pursuant to Article 1, para. 1(a) of Regulatory Decision 1 on “Dematerialized Securities System Management and Operation Fees” of ATHEXCSD and as of 12/04/2021 is calculated pursuant to Decision 18 of the Board of ATHEXCSD, as well as support services, which are billed at prices similar to those in transactions carried out between third parties.

(Amounts in thousands euro, unless otherwise noted) 57

For the affiliated company “HELLENIC ENERGY EXCHANGE S.A.” the receivables and revenue for the financial year 2021 and the respective year 2020 are shown in the following table:

RECEIVABLES (in €)	31/12/2021	31/12/2020
ATHEXClear	9,300	27,900

REVENUE (in €)	31/12/2021	31/12/2020
ATHEXClear	30,000	30,000

For the affiliated company “EnEx CLEARING HOUSE S.A.” the receivables and revenue for the financial year 2021 and the respective year 2020 are shown in the following table:

RECEIVABLES (in €)	31/12/2021	31/12/2020
ATHEXClear	3,100	17,980

REVENUE (in €)	31/12/2021	31/12/2020
ATHEXClear	10,000	10,000

5.24. MEMBERS OF THE BOARD OF DIRECTORS OF THE COMPANY

ATHENS EXCHANGE CLEARING HOUSE S.A	
Name	**Position**
George Handjinicolaou	Chairman, non-executive member
Alexios Pilavios	Vice Chairman, non-executive member
Yianos Kontopoulos *	Chief Executive Officer, executive member
Giorgos Doukidis	Independent non-executive member
Polyxeni Kazoli	Independent non-executive member
Theano Karpodini	Independent non-executive member
Pantelis Tzortzakis	Independent non-executive member

* *On 8/3/2022 the Board of Directors elected Mr. Yianos Kontopoulos to replace Mr. Socrates Lazaridis..*

5.25. CONTINGENT LIABILITIES

None. All claims are expected to be collected in full.

5.26. EVENTS AFTER THE DATE OF THE STATEMENT OF FINANCIAL POSITION

The Board of Directors, at its extraordinary meeting on 22/1/2022, unanimously selected Mr. Yianos Kontopoulos as the new Chief Executive Officer of the Company. The election of Mr. Kontopoulos as a new member of the Board of Directors took place on 08/03/2022.

(Amounts in thousands euro, unless otherwise noted) 58

The Ukrainian crisis that erupted in February 2022 is expected to cause significant turmoil in the global economy in 2022. Although the impact of the crisis on the Group cannot be fully predicted, the Group's overall exposure to the Ukrainian and Russian markets is minimal and the consequences are not expected to significantly affect the Group. Management is closely monitoring the situation and will take appropriate action when necessary.

There is no other event that has a significant effect in the results of the Company which has taken place or was completed after 31/12/2021, the date of the 2021 annual financial statements and up until the approval of the financial statements by the Board of Directors of the Company on 28/03/2022.

5.27. ADJUSTMENTS

Modifications in the published information of the Company in the Statement of Comprehensive Income for fiscal year 2020

A reclassification of accounts in the Statement of Comprehensive Income for 2020 took place.

The following table shows the reclassifications in the published Statement of Comprehensive Income of the Company for fiscal year 2020.

	01.01 31/12/2020 Modified	01.01 31/12/2020 Published	01.01 31/12/2020 Reclassification
Revenue			
Post-trading services	8,602	0	8,602
Clearing	0	8,476	(8,476)
Depository Services	0	126	(126)
Ancillary Services	168	147	(147)
Other services	0	21	147
Total turnover	**8,770**	**8,770**	**0**
Utilities	9	0	9
Other operating expenses	403	246	157
Expenses for ancillary services	0	166	(166)
Total operating expenses before depreciation	**412**	**412**	**0**

As to the reclassification of amounts in relation to the published statements for the year ended 31/12/2020:

Post-trading Services include Transaction Clearing and Clearing House Services and Ancillary Services include revenues from Other Services as at 31/12/2021.

Other Operating Expenses include the Expenses for Ancillary Services as at 31/12/2021, while the expenses relating to Utilities, which are shown as a separate category of operating expenses for the year 2021, at 31/12/2020 were included in the Other Operating Expenses.

(Amounts in thousands euro, unless otherwise noted) 59

Athens, 28 March 2022

THE CHAIRMAN OF THE BoD

GEORGE HANDJINICOLAOU ______________________________

THE CHIEF EXECUTIVE OFFICER

YIANOS KONTOPOULOS ______________________________

THE CHIEF FINANCIAL OFFICER

NICK KOSKOLETOS ______________________________

THE DIRECTOR OF FINANCIAL MANAGEMENT

LAMBROS GIANNOPOULOS ______________________________