

The Association of Global Custodians - Questionnaire

Name	Greece- The Bank of Greece Securities Settlement System
Contact Name	Dimitra Giortsiou
Address	Bank of Greece Book entry securities management section - Panepistimiou 21 Athens 10250
Country	Greece
Phone	(+30210) 3202625
Fax	(+30210) 3202672
E-mail	sec.securities@bankofgreece.gr
Web Site	www.bankofgreece.gr

Welcome to the Depository-
Information Gathering Project. Before
beginning, we suggest that you: print
the entire document for review on
paper; review the Glossary of Terms.
Each will assist you with answering
the questions. For help, contact: Robin
D. Truesdale, Baker & McKenzie LLP
(202) 835-1664; e-mail:
Robin.Truesdale@bakermckenzie.com.

SCOPE, STRUCTURE, OWNERSHIP, CAPITAL, REGULATION AND AUDIT

The purpose of this section is to understand the ownership structure and financial strength of your institution, as well as the level of regulatory and operational supervision to which it is subject.

Response Necessary/Eligibility Question

1. Rule 17f-7, by reference to Rule 17f-4, requires that, for a depository to be eligible to hold securities of U.S. registered investment companies (such depositories hereinafter referred to as "Eligible Securities Depositories"), the depository must be a "system for the central handling of securities where all securities of any particular class or series of any issuer deposited within the system are treated as fungible and may be transferred or pledged by bookkeeping entry without physical delivery of the securities."

Are all securities of a particular class or series of any issuer that are deposited in your institution treated as fungible, and can they be transferred or pledged by bookkeeping entry without physical delivery of the securities?

Yes

1a. Please explain:

Response Necessary/Eligibility Question

2. Rule 17f-7 also requires that an Eligible Securities Depository "acts as or operates a system for the central handling of securities or equivalent book-entries in the country where it is incorporated," or "acts as or operates a transnational system for the central handling of securities or equivalent book-entries."

Does your institution: (Choose all that apply.)

Act as or operate a system for the central handling of securities or equivalent book-entries in the country where it is incorporated? (please answer 2b)

2a. Please explain:

2b. Please specify the types of securities for which you act as or operate a system for the central handling of securities or equivalent book-entries:

Government securities and Corporate/semiGovernment securities

3. What type of legal entity is the institution? (Choose all that apply.)

Central Bank (or part thereof)

3a. Please explain:

4. Is the institution operated as a "for profit" or a "not for profit" organization?

Other (please answer 4a)

4a. If other, please explain:

Special status - Central Bank of the Eurosystem

5. Please provide the names of the owners and their ownership interest percentages.

Widely diversified ownership with no single shareholder owning more than 10% of shares

6. Please answer the following:

6a. What is the date of establishment of the depository?

31/May/1995

6b. What is the date that the depository's operations began?

31/May/1995

7. Under what regulation or statute is the depository established and governed?

Law 2198/94 GOVERNMENT GAZETTE OF THE HELLENIC REPUBLIC, VOLUME 43, CHAPTER B and law 2469/97

7a. Is the regulation or statute electronically available?

Yes (please answer 7b)

7b. If regulation or statute is electronically available, please supply web address(es) here or upload document(s) in question 7c.

<http://www.bankofgreece.gr/BogDocumentEn/Statute.pdf>

7c. Please supply document(s) here:

7d. Please provide details of the structure and composition of your Board together with their industry experience and responsibilities in governing the depository.

What are the qualifications to become a board member?

please refer to question 3 and 5

7e. What are the election procedures?

please refer to question 3 and 5

7f. What is the maximum length of time a board member can serve?

please refer to question 3 and 5

7g. How are the voting powers distributed amongst the board members (i.e. does each board member have one vote or do certain members have additional voting power)?

please refer to question 3 and 5

7h. Who is responsible for regulating the board members?

please refer to question 3 and 5

Response Necessary/Eligibility Question

8. Rule 17f-7 requires that an Eligible Securities Depository "is regulated by a foreign financial regulatory authority as defined under section 2(a)(50) of the Act", with section 2(a)(50) establishing that "foreign financial

regulatory authority' means any (A) foreign securities authority, (B) other governmental body or foreign equivalent of a self-regulatory organization empowered by a foreign government to administer or enforce its laws relating to the regulation of fiduciaries, trusts, commercial lending, insurance, trading in contracts of sale of a commodity for future delivery, or other instruments traded on or subject to the rules of a contract market, board of trade or foreign equivalent, or other financial activities, or (C) membership organization a function of which is to regulate the participation of its members in activities listed above."

Who regulates the activities of the depository? (Choose all that apply.)

Other (please answer 8a)

8a. Please explain:

THE BANK OF GREECE BY GOVERNOR'S ACTS

9. Please provide the name of regulatory authority(ies) identified in question 8:

THE BANK OF GREECE

Response Necessary/Eligibility Question

10. Rule 17f-7 requires that an Eligible Securities Depository "is subject to periodic examination by regulatory authorities or independent accountants."

Is the depository subject to periodic examination by: (Choose all that apply.)

Other (please answer 10a)

10a. Please explain:

The BOGS is subject to control by the Bank of Greece Internal Auditing Department. The audit and reporting procedures ensure that there is no risk of fraud or negligence from the part of the Bank. As an internal section of the Bank of Greece, the System is also subject to the external audit control of the Bank as a result of its participation in the Eurosystem.

11. What enforcement actions are available to the regulatory authority(ies) for breach of applicable statute or regulatory requirements? (Choose all that apply.)

Name of Authority #1 (please answer 11a):

Bank of Greece

11a.

Other (please answer 11b)

11b. Please explain:

This is not applicable because the depository is an organisational unit of the Bank of Greece itself.

Name of Authority #2 (please answer 11c):

11c.

11d. Please explain:

12. Has there been any use of such enforcement actions in the last three years?

No

12a. If yes or other, please explain:

Capital

13. Are annual financial statements publicly disclosed?

Yes (please answer 13a)

13a. If yes, the AGC requests a copy of the institution's annual report. Is the annual report available electronically?

Yes (please answer 13b)

13b. If yes, please upload the document(s) here or insert web link(s) in question 13d:

13c. If more than one document for 13b, please upload the additional document here:

13d. Please insert web link(s) for 13b here:

http://www.bankofgreece.gr/BogEkdoseis/Summary_Annrep2011.pdf

13e. If no, and annual report and/or financial statements are not disclosed, please state your share capital, reserves, and retained earnings (or equivalents as determined under local accounting standards).

Share Capital (then please answer 13f):

13f. Reserves (then please answer 13g):

13g. Retained Earnings:

13h. If other, please explain:

Internal Audit

14. Is an internal audit undertaken in your depository?

Yes (please answer 14a)

14a. If yes, what areas does the audit cover (financials, operations, etc.) and which department in your depository handles it?

Financial and operations. The internal audit department of the Bank of Greece.

14b. Please list the date of your last internal audit and the period that the audit covered:

19/Jan/2006

to

24/Mar/2006

14c. How frequently does the internal audit occur? (Choose one.)

Less than annually (please answer 14d)

14d. If less than annually, please explain:

There is no fixed calendar

14e. Are the results of the internal audit publicly available?

No

14f. Please select the statement that most accurately characterizes the results of the last internal audit: (Choose one.)

No material exceptions found.

14g. If minor or material exceptions were found, what actions were taken? Please describe:

The last internal audit was performed during the period 19/1/2006-24/3/2006 and it covered a period of approximately 7 years

15. Is a financial audit performed by an Audit Firm, Regulatory Authority, or other external party?

Yes (please answer 15a)

15a. If yes, please state the name(s) of the entity(ies) who perform the financial audit.

Body of Certified Chartered Accountants Ernst & Young

15b. Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party:

15c. Please list the period that the audit covered:

to

15d. How frequently does the financial audit occur? (Choose one.)

Less than annually (please answer 15e)

15e. If less than annually, please explain:

15f. Are the results of the financial audit publicly available?

No

15g. Please select the statement that most accurately characterizes the results of the last financial audit: (Choose one.)

No material exceptions found.

15h. If minor or material exceptions were found, what actions were taken? Please describe:

16. Is an operational audit performed by an Audit Firm, Regulatory Authority, or other external party?

Yes (please answer 16a)

16a. If yes, please state the name(s) of the entity(ies) who perform the operational audit.

Body of Certified Chartered Accountants Ernst & Young

16b. Please list the date of your last operational audit performed by an Audit Firm, Regulatory Authority, or other external party:

16c. Please list the period that the audit covered:

to

16d. How frequently does the operational audit occur? (Choose one.)

Less than annually (please answer 16e)

16e. If less than annually, please explain:

16f. Are the results of the operational audit publicly available?

No

16g. Please select the statement that most accurately characterizes the results of the last operational audit: (Choose one.)

No material exceptions found.

16h. If minor or material exceptions were found, what actions were taken? Please describe:

PARTICIPANTS AND PARTICIPATION

The purpose of this section is to understand issues relating to participation in the depository, including eligibility requirements, conditions of participation, and supervision of participants.

17. What types of entities are eligible to become participants and how many of each type are there currently? (Choose all that apply.)

Banks (please answer 17a), Brokers (please answer 17e), Individuals (please answer 17i), Other entities (please answer 17q)

17a. How many Bank participants are there currently? (then please answer 17b)

30

17b. Please select the features included in the eligibility requirements for Banks. (Choose all that apply.)

Financial Thresholds (please answer 17c), Regulatory Oversight (please answer 17c), Other (please answer 17d)

17c. Where can a description of the specific eligibility requirements for Bank participants be found? in the system's regulations

17d. Please explain:

maintain a cash account at the national RTGS payment system (TARGET2)

17e. How many Broker participants are there currently? (then please answer 17f)

41

17f. Please select the features included in the eligibility requirements for Brokers. (Choose all that apply.)

Financial Thresholds (please answer 17g), Regulatory Oversight (please answer 17g)

17g. Where can a description of the specific eligibility requirements for Broker participants be found? in the system's regulations

17h. If other, please explain:

17i. How many Individual participants are there currently? (then please answer 17j)

0

17j. Please select the features included in the eligibility requirements for Individual participants. (Choose all that apply.)

Other (please answer 17l)

17k. Where can a description of the specific eligibility requirements for Individual participants be found?

17l. If other, please explain:

Act of the Governor of the Bank of Greece

17m. How many Foreign Institution participants are there currently?

17n. Please select the features included in the eligibility requirements for Foreign Institution participants. (Choose all that apply.)

17o. Where can a description of the specific eligibility requirements for Foreign Institution participants be found?

17p. If other, please explain:

17q. If you have selected "Other entities" above, please explain:

Bank of Greece, Hellenic Exchanges (HELEX), Ministry of Finance, EU SSSs/CSDs eligible for participations in Eurosystems' operations, European Investment Bank (as a beneficiary of collaterals), other agents specified by a Bank of Greece Governor's Act or individually approved on condition of meeting a number of criteria guaranteeing that they have an adequate level of organisation.

17r. Indicate how many "Other entities" are currently participants?

6

17s. Please select the features included in the eligibility requirements for the participants referred to above as "Other entities". (Choose all that apply.)

Regulatory Oversight (please answer 17t)

17t. Where can a description of the specific eligibility requirements for participants described above as "Other entities" be found?

not applicable

17u. If other, please explain:

18. Are participants required to contribute capital to the depository that would result in ownership of the depository?

No

18a. If yes, what fixed amount is required or what formula is used to determine the appropriate contribution level?

18b. If other, please explain:

19. Are prospective participants subject to an initial review and approval process regarding compliance with eligibility requirements?

Yes

19a. If other, please explain:

Conditions of Participation

20. What governs the relationship between the depository and the participants? (Choose all that apply.)

Relevant law and regulation, Standard participation contract, Established terms and conditions of participation, Rules of the depository, Other (please answer 20a)

20a. Please explain:

Acts of the Governor of the Bank of Greece

Response Necessary/Eligibility Question

21. Rule 17f-7 requires that an Eligible Securities Depository "holds assets for the custodian that participates in the system on behalf of the Fund under safekeeping conditions no less favorable than the conditions that apply to other participants."

Please confirm that assets of foreign investors held by custodians as participants in the depository are held under safekeeping conditions no less favorable than the conditions that apply to other participants.

Yes (please answer 21b)

21a. If no, other or not applicable, please explain:

21b. Please confirm the basis for the arrangements you have in place to ensure that the assets you hold for custodians receive the same level of safekeeping protection as the assets held for other categories of participants. (Choose all that apply.)

Relevant Law and Regulation, Standard participation contract, Established terms and conditions of participation, Rules of the depository

21c. Please explain:

22. How does the depository notify participants of material changes to the conditions of participation? (Choose all that apply.)

By e-mail, By telephone, Other (please answer 22a)

22a. Please explain:

by an official letter

Governance of Participants

23. Who enforces compliance with the depository's conditions of participation? (Choose all that apply.)

Other (please answer 23a)

23a. Please explain:

The Bank of Greece as operator of the system

24. What enforcement actions are available to the enforcement authority? (Choose all that apply.)

Fines, Suspension of participation, Termination of participation, Other (please answer 24a)

24a. Please explain:

a) cancellation of transactions not covered by existing balance (securities or cash) b) liquidation of the participant's assets for the fulfilment of his/her obligations

25. Has there been any such enforcement actions in the last three years?

No

25a. If yes, please explain, including information relative to any suspensions of depository participants:

25b. If other, please explain:

DEPOSITORY FUNCTIONALITY AND SERVICES; USE OF AGENTS

Certain functionalities and services reduce risk to an investor if provided in an efficient manner. The purpose of this section is to identify those functionalities that may potentially be offered by depositories and clearing systems around the world, and ascertain whether they are offered by your institution.

General

26. For which of the following security types do you serve as a depository or clearing system? (Choose all that apply.)

Government securities, Corporate bonds

26a. Please name the other security types:

27. Is the use of the depository in your market compulsory by law or compulsory by market practice for the settlement or safekeeping of all instrument types in your market (e.g. equities, government securities, corporate bonds, money market instruments, warrants, derivatives etc). (Choose all that apply.)

Yes by law for settlement, but not for all instrument types (please answer 27a), Yes by law for safekeeping, but not for all instrument types (please answer 27b)

27a. Please list the instrument types for which it is not compulsory by law to:

(i) settle in your depository

Corporate bonds and equities

(ii) safekeep in your depository:

Corporate bonds and equities

27b. Please list the instrument types for which it is not compulsory by market practice to:

(i) settle in your depository

Corporate bonds and equities

(ii) safekeep in your depository:

Corporate bonds and equities

27c. If neither/other, please explain:

28. Settlement and Safekeeping Percentages

28a. Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) settled within your institution, exclusive of your links with third parties.

Government bonds: 100% Corporate bonds: at the moment only three corporate bonds are settled in BOGS

28b. Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) held in safekeeping within your institution.

Government bonds: 100% Corporate bonds: at the moment only three corporate bonds are settled in BOGS

29. Are there any activities performed by a third party on behalf of the depository for the depository participants (e.g., vaulting of physical securities, registration, entitlement processing, etc.)?

No

29a. If third parties are employed, please indicate which services they supply (then please answer 29b):

29b. If third parties are employed, does the depository assume liability for losses incurred by participants as a result of the actions/inactions of the third parties?

29c. If you acknowledge responsibility, please indicate whether your responsibility is assumed (Choose all that apply.)

29d. If you acknowledge responsibility for agents, your responsibility is assumed for losses (Choose all that apply.)

29e. If other, please explain:

29f. Please specify limit:

29g. Please specify limit:

29h. If other, please explain:

29i. If other, please explain:

30. Has any participant suffered any losses in the past three years due to the depository's performance?

No

30a. If yes, please select all of the following in which loss has occurred. You will be prompted to enter the number of instances and total loss in USD thereafter. (Choose all that apply.)

30b. Corporate Action. Please specify number of instances:

30c. Corporate Action. Please specify total loss in USD:

30d. Settlement Process - Securities. Please specify number of instances:

30e. Settlement Process - Securities. Please specify total loss in USD:

30f. Settlement Process - Cash. Please specify number of instances:

30g. Settlement Process - Cash. Please specify total loss in USD:

30h. System Outage. Please specify number of instances:

30i. System Outage. Please specify total loss in USD:

30j. If Other, please explain:

30k. For Other, please specify number of instances:

30l. For Other, please specify total loss in USD:

30m. If other, please explain:

Other Services

31. Who accepts cash deposits (or makes payment credit accommodations) for depository transactions? (Choose all that apply.)

Central Bank

31a. Please name banks:

31b. If neither/others, please explain:

32. Who processes cash clearing (or draws on credit lines, if applicable) for depository transactions? (Choose all that apply.)

Central Bank

32a. Please name banks appointed by depository:

32b. If others, please explain:

33. Who controls the movement of cash for cash deposits (or draws on credit lines, if applicable)? (Choose all that apply.)

Central Bank

33a. Please name banks appointed by depository:

33b. If others, please explain:

34. Who controls the movement of cash for cash clearing (or for draws on credit lines, if applicable)? (Choose all that apply.)

Central Bank

34a. Please name banks appointed by depository:

34b. If others, please explain:

35. Please indicate services you provide. (Choose all that apply.)

Tax assistance where foreign holders may be entitled to tax relief at source or through a claim., Collateral handling in support of activities including securities lending, overdraft coverage, cash management, repurchase agreements, etc. Please provide details. (please answer 35c), Same day turnaround settlements., Other (please answer 35d)

35a. Automatic securities lending facility is provided for: (Choose all that apply.)

35b. If other please explain:

35c. Collateral Handling: please provide details:

Pledged intraday liquidity and monetary policy operations and repos for commercial transactions.

35d. If other services, please explain:

Repo auctions in case of short positions at the closing of the system may be executed after request by the relevant participant.

36. What procedures are in place for the processing of corporate action entitlements? (Choose all that apply.)

Not applicable

36a. Credited to the securities account: (Choose all that apply.)

36b. If other please explain:

36c. Name of entity:

36d. If other, please explain:

37. What procedures are in place for the processing of interest and dividends?(Choose all that apply.)

Other (please answer 37d)

37a. Credited to the cash account: (Choose all that apply.)

37b. If other please explain:

37c. Name of entity:

37d. If other please explain:

The BOGS collects the proceeds of interest payments from the issuer's accounts and credits the cash accounts of the participants on payment day

Linkages With Other Central Securities Depositories (CSD) or International Central Securities Depositories (ICSD)

38. Please list all depositories or settlement systems to which you have an electronic link.

None

39. Are procedures and controls (firewalls) in place to avoid systemic collapse or contamination if one of the linked entities should experience business interruptions for whatever reason?

Not applicable

39a. Please explain:

40. Has a business interruption recovery plan been developed in the event the linkages should become inoperable for any reason?

Not applicable

40a. If no or other, please explain:

ACCOUNT STRUCTURES AND RECORDKEEPING

The purpose of this section is to identify the nature of accounts; the naming convention is employed, the level of segregation achieved, accessibility in the event of bankruptcy and the frequency of reporting generated from them.

41. Are participants permitted to maintain more than one account at the depository?

Yes (please answer 41a)

41a. If yes, please indicate number: (Choose one.)

More than one account (please answer 41b and indicate how many)

41b. If more than one account what is the maximum?

Own portfolio: 5 accounts; customers: unlimited; collateral: 2 accounts for each category of customers' account (central government sector, domestic non-financial institutions, households and non-profit institutions serving the households sector, etc.)

41c. If other, please explain:

41d. If other, please explain:

42. Are participants required/permited to segregate assets held for their own benefit from those they hold for their clients?

Yes (please answer 42a)

42a. If yes, is segregation required or simply permitted?

Required (please answer 42b)

42b. How does segregation occur? (Choose all that apply.)

By sub-accounts within a single participant account.

42c. If other, please explain:

42d. If other, please explain:

42e. If other, please explain:

43. Does the depository permit its participants to open accounts in the participant's own nominee name(s)?

No

43a. If yes, do laws exist, which define as well as protect the rights of beneficial owners with respect to securities registered in nominee name?

43b. If other, please explain:

44. In the event a participant's single or main account is blocked for any reason (e.g., insolvency, penalties, violations, liens), would securities held in any account or accounts on behalf of the participant's clients be accessible:

44a. By the participant's clients?

Yes (please answer 44b)

44b. If yes, please describe briefly how clients of participants would access their securities and whether there would be any delay in their ability to do so:

They can access their securities through a procedure implemented by BOGS. After having received an order from the participant's administrator, BOGS can immediately transfer clients securities to another participant's account on behalf of the clients according to Art.15 of the operating regulations.

44c. If other, please explain:

44d. By the intervening authorities controlling insolvency or other proceedings?

No

44e. If yes, please describe briefly under what conditions access would be granted to the intervening authorities:

44f. If other, please explain:

44g. By the participant's creditors?

No

44h. If yes, please describe briefly under what conditions access would be granted to the participant's creditors:

44i. If other, please explain:

44j. By the depository's creditors?

No

44k. If yes, please describe briefly under what conditions access would be granted to the depository's creditors:

44l. If other, please explain:

45. In what form does the depository maintain records identifying the assets of each participant? (Choose all that apply. Please refer to "Help" for clarification.)

Computer file (please answer 45b)

45a. If other, please explain:

45b. In which format is the source data maintained?

Computer file: stored in data base Since 2002, source data are maintained exclusively in electronic form

Response Necessary/Eligibility Question

46. Rule 17f-7 requires that an Eligible Securities Depository "provides periodic reports to its participants with respect to its safekeeping of assets, including notices of transfers to or from any participant's account."

Does the depository make available periodic safekeeping reports to participants, including notices of transfers to or from the participant's account?

Yes (please answer 46b)

46a. If no or other, please explain:

46b. If yes, please indicate the scheduled frequency: (Choose one.)

Daily

46c. If other, please explain:

47. What is your document and record retention policy for documents and records described above in this section? (Choose one.)

Other (please answer 47a)

47a. If other, please explain:

Notifications and statements of accounts are retained for 5 years unless a contractual liability lasts longer. 20 years record for ISIN issues and participants' identification data

SETTLEMENTS

The purpose of this section is to identify the model of settlement employed, the relationship between cash and securities, and the basis on which participants meet their obligations.

48. The Committee on Payment and Settlement Systems of the Bank for International Settlements (BIS) has identified three common structural approaches or models for linking delivery and payment in a securities settlement system. Please indicate which model your procedures most closely resemble (Please refer to details on the models within the "Help" section located below this question): (Choose all that apply.)

Model 1 - Gross, Simultaneous Settlements of Securities and Funds Transfers. (please answer 48a), Model 3 - Simultaneous Net Settlement of Securities and Funds Transfers. (please answer 48a)

48a. Please briefly describe your settlement process, including how your settlement procedures may vary from the model chosen above (and as described below in the Help section)?

DvP model 3 for optimization

48b. If other, please explain:

Question 48 Help:

Model 1 - Gross, Simultaneous Settlements of Securities and Funds Transfers. These systems settle transfer instructions for both securities and funds simultaneously on a trade-by-trade (gross) basis, with final (irrevocable and unconditional) transfer of securities from the seller to the buyer (delivery) occurring at the same time as final transfer of funds from the buyer to the seller (payment). The securities settlement system maintains securities accounts and funds accounts for participants. Transfer of securities and cash are made by book-entry.

Model 2 - Gross Settlements of Securities Transfers Followed by Net Settlement of Funds Transfers. These systems settle securities transfer instructions on a trade-for-trade (gross) basis, with final transfer of securities from the seller to the buyer (delivery) occurring throughout the processing cycle, but settle funds transfer instruction on a net basis, with final transfer of funds from the buyer to the seller (payment) occurring at the end of the processing cycle.

The securities settlement system maintains securities accounts for participants, but funds accounts are usually held by another entity (often a commercial bank or the central bank). Securities are transferred by book-entry, such transfer being final at the instant the entries are made on the securities settlement system's books. The corresponding funds transfers are irrevocable, but not final. During the processing cycle, the system calculates running balances of funds debits and credits, the balance being settled at the end of the processing cycle when the net debit and net credit positions are posted on the books of the commercial bank or central bank that maintains the funds accounts. Settlement of funds accounts may occur once a day or several times a day.

Model 3 - Simultaneous Net Settlement of Securities and Funds Transfers. These systems settle transfer instructions for both securities and funds on a net basis, with final transfer of both occurring at the end of the processing cycle. Settlement may occur once a day or several times a day. The securities settlement system maintains securities accounts for participants. Funds accounts may be maintained by another entity, either a commercial bank or the central bank.

49. Are the cash and security movements simultaneous?

Yes

49a. If cash and security movements are not simultaneous, please indicate the duration of the timing gap. (Choose one.)

49b. If other, please explain:

49c. If other, please explain:

OWNERSHIP OF SECURITIES

The purpose of this section is to determine how ownership of securities is represented, the ways the depository maintains ownership or control of securities held in the depository, and the extent to which ownership of assets held by the depository is separated from the proprietary assets of the depository.

50. How are depository eligible securities held by the depository?

Securities in the depository are held in dematerialized form.

50a. If other, please explain and identify amount held in this other form as a percentage of total depository holdings:

51. If depository eligible securities are certificated, can depository eligible securities be held outside of the depository?

Not applicable

51a. If certain designated securities are held outside the depository, please indicate under which conditions these securities would be held outside the depository:

51b. If depository eligible securities are required to be centrally immobilized at the depository, where and with whom are the certificates safekept? (then please answer 51c)

51c. Are these certificates:

51d. If registered, how are the depository eligible securities registered?

51e. If other, please describe:

51f. If in the name of a separate nominee, please identify by name the nominee used:

51g. If other, please explain:

51h. If depository eligible securities may be held either in or out of the depository, are these certificates:

51i. What are the control features for receipt of certificates to the depository (e.g., authentication procedures, re-registration)? Please describe:

51k. If other, please explain:

52. If securities are dematerialized:

May dematerialized security positions be re-certificated and held outside the depository?

No (please answer 52a)

52a. Are the securities held: (Choose all that apply.)

Through book-entry at the depository

52b. Please identify which types of entities may act as registrars: (Choose all that apply.)

52c. Please explain:

52d. If the securities held by the depository are recorded by book entry at the registrar, are the securities registered only to the depository, with the depository providing the function of recording ownership on a centralized basis for the market? (Choose all that apply.)

52e. If yes, how are securities held at the registrar for the account of the depository? (Choose one.)

52f. Please describe:

52g. If the securities held with the depository are recorded by book-entry at the registrar but are not registered exclusively to the depository, may they be registered to:

52h. Please describe:

52i. If the securities held with the depository are recorded by book-entry at the registrar, what are the control features at the registrar for transfer of registrar positions to and from the depository (e.g., authentication procedures, reconciliation, confirmation of position at registrar)? Please describe:

52j. If other, please explain:

52k. If other, please explain:

52l. If other, please explain:

Response Necessary/Eligibility Question

53. Rule 17f-7 requires that an Eligible Securities Depository “maintains records that identify the assets of each participant and segregate the system’s own assets from the assets of participants.”

Does the depository maintain records that identify the assets of each participant and segregate the system's own assets from the assets of participants?

Yes

53a. If other, please explain:

54. Does the law protect participant assets from claims and liabilities of the depository?

Yes

54a. If other, please explain:

55. Can the depository assess a lien on participant accounts? (A lien would entitle the depository to take and hold or sell the securities of the participant in payment of a debt.)

Yes (please answer 55a)

55a. If yes, for what reasons are liens or similar claims imposed? (Choose all that apply.)

Fees and expenses, Collateralization of overdrafts, Other (please answer 55b)

55b. Please describe:

For Eurosystem operations, in accordance with Art.54 of the Bank of Greece statute.

55c. Please indicate the limits of this lien as indicated below: (Choose one.)

55d. Please explain:

55e. If a lien is placed on a participant's account which has been designated for its clients, will the depository select certain securities to be subject to the lien?

55f. If yes, please indicate whether: (Choose one.)

55g. Please explain:

55h. If no, please indicate whether the entire account will be subject to the lien.

55i. If other, please describe:

55j. For accounts designated as client accounts, do procedures exist to restrict the placement of liens only to obligations arising from safe custody and administration of those accounts?

55k. If yes, are the restrictions accomplished by:

55l. Please explain:

55m. If other, please explain:

55n. If other, please explain:

55o. If other, please explain:

56. Transfer of Legal Ownership

Does the depository have legal authority to transfer title to securities?

Yes (please answer 56a)

56a. When does title or entitlement to depository securities pass between participants? (Choose one.)

When the transaction is processed on an intra-day basis. (please answer 56c), Other (please answer 56b)

56b. Please describe:

During the day when the relevant instructions are finally settled.

56c. Where does title or entitlement to depository securities pass between participants? (Choose one.)

On the depository books

56d. Please describe:

56e. If other, please explain:

After receiving the relevant instructions from both counterparties

HANDLING OF SECURITIES OUTSIDE THE DEPOSITORY ENVIRONMENT

The purpose of this section is to consider the process (and any risk inherent within such a process) that involves the safekeeping of client assets while they are being removed from a depository and being lodged into a depository.

57. How are eligible securities lodged (that is, placed) in the depository system? (Choose all that apply.)

Other (please answer 57a)

57a. Please describe:

Assets cannot be lodged in the name of the depository for any reason. Lodging of securities into the depository occurs through primary market operations (i.e. issuance of new securities). According to current operational framework securities are not lodged through secondary market operations.

58. When are securities lodged into the depository reflected in a participant's depository account? (Choose all that apply.)

Other (please answer 58a)

58a. Please explain:

After the settlement, on DVP basis, of the appropriate transaction

59. How long does it usually take to lodge securities with the depository? (Choose one.)

Other (please answer 59b)

59a. Please specify:

59b. If other, please explain:

primary auctions are settled at t+3

60. During the process of lodging securities into the depository, can the securities:

Be traded?

Not applicable

60a. During the process of lodging securities into the depository, can the securities:

Be settled?

Not applicable

60b. During the process of lodging securities into the depository, can the securities:

Have ownership transferred?

Not applicable

60c. If they cannot be traded, or if you answered other, please explain:

60d. If they cannot be settled, or if you answered other, please explain:

60e. If ownership cannot be transferred, or if you answered other, please explain:

61. Are securities immediately available for delivery upon transfer to the depository?

Yes

61a. If no: Securities are unavailable for:

61b. If more than 4 weeks, please specify:

61c. If other, please explain:

61d. If other, please explain:

62. Please describe briefly the arrangements/procedures/facilities you maintain to ensure that eligible securities held at the depository are handled at least as efficiently as compared to securities held outside the depository, particularly in relation to income, corporate actions and proxy services.

63. What transfer process steps are involved when eligible securities are withdrawn from the depository for safekeeping? (Choose one.)

Other (please answer 63a)

63a. Please specify:

Only when the issuer buys back assets

64. How long does it usually take to remove securities from the depository? (Choose one.)

Other (please answer 64b)

64a. Please specify:

64b. If other, please explain:

On value date

65. While the securities are being removed from the depository, can they:

65a. Be traded? (Choose one)

Not applicable

65b. Please explain:

65c. Be settled?

Not applicable

65d. Please explain:

65e. Have ownership transferred?

Not applicable

65f. Please explain:

STANDARD OF CARE

The purpose of this section is to understand the responsibility and liability that the depository has in providing services to its participants/members in the settlement and clearing of securities and/or cash, and to understand what type of protections exist for participants in the event of a participant failure/default.

Depository Liability

66. Does the depository accept liability (independent of any insurance coverage) for the following:

66a. Reconciliation errors with the registrar and/or the issuer that result in direct damages or losses to participants?

No

66b. If yes, please check all of the following that apply:

66c. If other, please explain:

66d. If other, please explain:

66e. Theft of securities (either physical certificate or electronically from accounts at the depository) from the depository that result in direct damages or losses to participants?

No

66f. If yes, please check all of the following that apply:

66g. If other, please explain:

66h. If other, please explain:

66i. Failure of the depository's systems that result in direct damages or losses to participants because they cannot use either securities or funds?

No

66j. If yes, please check all of the following that apply:

66k. If other, please explain:

66l. If other, please explain:

66m. Any direct damages or losses to participants caused by the depository due to its errors, omissions or fraud?

Yes (please answer 66n)

66n. If yes, please check all of the following that apply:

The depository assumes liability for direct losses

66o. If other, please explain:

66p. If other, please explain:

66q. Any direct damages or losses to participants caused by the depository in its capacity as a central counterparty?

No

66r. If yes, please check all of the following that apply:

66s. If other, please explain:

66t. If other, please explain:

66u. Does the depository guaranty settlement?

Yes (please answer 66v)

66v. Please explain how this is accomplished. What are the procedures and safeguards that permit the depository to guaranty settlement?

DVP mechanism - RTGS/DVP model 1 and model 3

66w. If other, please explain:

66x. Any direct damages or losses to participants caused by the depository as a result of force majeure events, acts of God, or political events, etc.?

No

66y. If yes, please check all of the following that apply:

66z. If other, please explain:

66~. If other, please explain:

66+. In all cases where the depository assumes responsibility for direct or indirect or consequential losses, is the depository's liability limited by a standard of care determination?

No

66*. Please define the standard of care applied:

66!. If other, please explain:

67. Do the depository's written contracts, rules, or established practices and procedures provide protection against risk of loss of participant assets by the depository in the form of?

67a. Indemnification

No

67b. Please explain (then please answer 67c):

67c. Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

67d. Insurance

No

67e. Please explain (then please answer 67f):

67f. Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

67g. Acknowledgement of liability for losses caused by depository's own actions.

No

67h. Please explain (then please answer 67i):

67i. Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

67j. Other

No

67k. Please explain (then please answer 67l):

67l. Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

68. Is the depository immune from legal action in its own jurisdiction?

No

68a. If other, please explain:

Security Control

69. How do participants receive information (view actual settlement of trades, movement of securities on their accounts, etc.) and see the status of their accounts? (Choose all that apply.)

By receipt of physical account holding statements, Other (please answer 69a)

69a. Please explain:

There are two alternative sources of information: 1)through the electronic trading platform HDAT; 2)on the Bank of Greece securities settlement system web site. Both sources enable the participants to track on-line, in real-time, each notice that has been sent to the Bank of Greece for settlement. The participants are informed about the status of their notices, which can be one of the following: unmatched, matched-ready to be settled, matched-ready to be settled with problems (either insufficient cash or securities), settled, invalid and finally unsettled

70. Do participants have access to affect their holdings, including confirming and affirming trades, movement of securities on their accounts, etc.?

No

70a. How is access given to participants? (Choose all that apply.)

70b. Please select type of electronic link:

70c. Please explain:

70d. If other, please explain:

71. Regarding data security:

71a. Are passwords used by participants to access their accounts?

Yes

71b. If other, please explain:

71c. Does each user have a unique user ID?

Yes

71d. If other, please explain:

71e. Are passwords regularly changed?

Yes (please answer 71f)

71f. How often?

Every two months

71g. If other, please explain:

71h. Is there a user lock-out after a pre-set number of unsuccessful User ID attempts?

No

71i. How many?

71j. If other, please explain:

72. Does the depository communicate with other market entities such as stock exchanges, payment systems, clearing houses, etc., by secured linkages?

Yes (please answer 72a)

72a. Please explain:

The system communicates with the payment system (TARGET 2), with the electronic secondary securities market (HDAT), with the electronic trading platforms EuroMTS and Brokertec and with Hellenic Exchanges (HELEX)

73. How does the depository communicate with other market entities?

73a. Stock Exchanges (Choose all that apply.)

Secured, leased, dedicated telephone line

73b. Payment Systems (Choose all that apply.)

Secured, leased, dedicated telephone line, Paper/other

73c. Clearing Houses (Choose all that apply.)

Not applicable

73d. Registrars (Choose all that apply.)

Not applicable

74. How is access to the physical building controlled? (Choose all that apply.)

By guards, By electronic keys/personal ID card

74a. Please explain:

75. What are the vault security procedures for the safekeeping of physical paper? (Choose all that apply.)

Not applicable; no vault is maintained

75a. Please indicate frequency of vault counts:

75b. Please explain:

Participant Default Protections Resulting from a Participant Failure

76. If a participant defaults, how is the loss covered? (Choose all that apply?)

Other (please answer 76d)

76a. Please explain the process:

76b. Please explain the process of how the loss is shared: (Choose one.)

76c. If other, please explain:

76d. Please explain:

The system liquidates assets of the affected participant to cover settlement liabilities

77. During the past three years, has there been a situation where a participant defaulted which resulted in a significant loss?

No

77a. How was the situation resolved? Or if you answered "Other," then please explain:

78. Does the depository have a guaranty fund independent of stock exchange or other market guarantees?

No (please proceed to 79)

78a. If yes, please respond to the following questions:

What is the size of the fund (then please answer 78b)?

78b. How is the size of the fund determined? (Choose one.)

78c. If other, please explain:

78d. How is the fund financed? (Choose one.)

78e. If so, what is the amount or percentage per owner?

78f. If so, what is the amount or percentage per participant?

78g. If other, please explain:

78h. Who is covered by the fund? (Choose all that apply.)

78i. If other, please explain:

78j. When is the guaranty fund used? (Choose all that apply.)

78k. If other, please explain:

78l. If other, please explain:

79. Does the depository have forms of oversight management for assessing and monitoring of the following? (Choose all that apply.)

Settlement controls that minimize or eliminate the risk of default by a participant (please answer 79d), Blocking of securities movement before receipt of payment, Blocking payment until securities are moved

79a. Please explain other loss or default protections:

79b. Please explain the requirements:

79c. Please explain how these debit caps work:

79d. What type or types of settlement controls (Choose all that apply.)

Blocking or freezing of securities positions (please answer 79e), Controlling DVP settlement (please answer 79f)

79e. Please explain:

As provided by system regulations.

79f. Please explain:

Blocking of the relevant participant's settlement transactions.

79g. Please explain:

79h. Please identify and explain:

79i. Please explain briefly how these work:

80. Does the stock exchange have default protections that extend to the depository, such as the following? (Choose all that apply.)

No

80a. Please explain:

BUSINESS RECOVERY PLAN

This section is intended to identify key aspects of the depository's Business Recovery Plan (BRP), including testing requirements and past results, expected recovery time periods, and the independent review and validation (if any) of the BRP.

81. Do you have a formal business recovery plan?

Yes (please answer 81a)

81a. Does your Business Recovery Plan include: (Choose all that apply.)

Back-up of all computer files, Off-site data storage, Back-up files stored and locked, Off-site operations facility

81b. Please identify both the frequency and the last date of testing for the following third party:

Depository participants/members

Testing involving the system participants is initiated following amendments and enhancements to current system communication

81c. Please identify both the frequency and the last date of testing for the following third party:

Stock exchange

Upon initiation of linkage to the ASE involving the new procedure of settling transactions in the ASE appropriate testing exercises took place. Additional testing takes place when necessary

81d. Please identify both the frequency and the last date of testing for the following third party:

Central bank

As explained above the central bank is the operator of the system

81e. Please identify both the frequency and the last date of testing for the following third party:

Local brokers

For local brokers who are direct participants to the system testing is initiated following amendments and enhancements to current system communication

81f. Please identify both the frequency and the last date of testing for the following third party:

Any other third party

Whenever a new procedure is introduced

81g. If other, please explain:

81h. If other, please explain:

82. How quickly can the main system be reactivated in the event of an outage? (Choose one.)

Other (please answer 82a)

82a. If other, please explain:

It depends on the source of the outage. In the case that the outage refers to the loss of power supply, the reactivation of the system will take less than 1 hour (around 15 minutes). If the outage refers to a hardware failure of a production server, the reactivation will be almost immediate since a stand-by server machine is available.

83. If a back-up system exists, how quickly can the back-up system be activated in the event of the main system failing? (Choose one.)

Other (please answer 83a)

83a. If other, please explain:

Less than 1 hour. The time depending on the time needed to reach the Disaster Recovery System which is a mirror of the Main Production system and it is located in the Information System Department of the Bank of Greece situated 10 km away from the Bank headquarters where the main system is located.

84. Will the depository publicly announce any system interruption?

Yes (please answer 84a)

84a. To whom will the depository disclose any system interruptions? (Choose all that apply.)

To all direct participants

84b. If so, please list webpage address:

84c. If so, please list all publications:

84d. Please explain:

84e. How will the depository disclose any system interruptions? (Choose all that apply.)

By e-mail, By telephone

84f. Please explain:

84g. If other, please explain:

85. In the past three years, has it been necessary to activate the recovery plan in a live situation?

No

85a. If yes, how much time was needed to implement the recovery plan? (Choose one.)

85b. How much time was needed to recover and restore business to normal operations? (Choose one.)

85c. What was the impact to the market? (Choose all that apply.)

85d. If other, please explain:

85e. If other, please explain:

PERFORMANCE, INSURANCE, AND LOSS

This section is intended to identify the level of insurance maintained by the depository, and the extent to which coverage would extend to financial loss incurred by participants and their clients, including but not limited to losses resulting from operating performance, security breaches, and employee negligence or misconduct.

86. Has there been any material loss by the depository during the past three years?

No

86a. If there has been a loss, please describe the cause, the final impact and the action taken to prevent a recurrence:

86b. If other, please explain:

87. Has the depository been subject to any litigation involving a participant during the past three years?

No

87a. Please explain the circumstances and resolution:

87b. If other, please explain:

88. Has the depository realized revenues sufficient to cover expenses during the past three years? (Choose one.)

Yes for all three years

88a. If other, please explain:

89. Does the depository maintain a reserve for operating losses?

Other (please answer 89b)

89a. Please describe and indicate reserve amount:

the depository operates within the framework of the Bank of Greece

89b. If other, please explain:

Not applicable because the depository operates within the framework of the Bank of Greece.

90. Has the regulatory body with oversight responsibility for the depository issued public notice that the depository is not in current compliance with any capital, solvency, insurance or similar financial strength requirements imposed by such regulatory body?

No

90a. Please describe:

90b. In the case of such a notice having been issued, has such notice been withdrawn, or, has the remedy of such noncompliance been publicly announced by the depository?

90c. If yes, please describe:

90d. If no, why not?

90e. If other, please explain:

90f. If other, please explain:

91. Does the depository have insurance to cover losses in the event of Default on settlement commitments by the depository or a participant?

No

91a. What is the amount of the coverage?

91b. What is the amount of the deductible?

91c. If other, please explain:

92. Does the depository have Fidelity insurance (that is, insurance to cover loss of securities or money resulting, for example, from acts such as forgery, theft, fraud and/or employee dishonesty)?

No

92a. What is the amount of the coverage?

92b. What is the amount of the deductible?

92c. If other, please explain:

93. Does the depository have insurance for Operational Errors?

No

93a. What is the amount of the coverage?

93b. What is the amount of the deductible?

93c. If other, please explain:

94. Does the depository have Errors and Omissions insurance?

No

94a. What is the amount of the coverage?

94b. What is the amount of the deductible?

94c. If other, please explain:

95. Does the depository have insurance for the Premises?

No

95a. What is the amount of the coverage?

95b. What is the amount of the deductible?

95c. If other, please explain:

96. Does the depository have any other insurance?

No

96a. If so, what is it for?

96b. What is the amount of the coverage?

96c. What is the amount of the deductible?

96d. If other, please explain:

97. Who is the insurance carrier? If more than one insurance carrier, please list each carrier here and provide your responses to questions 97a and 97b in corresponding order.

n/a

97a. Who is the insurance carrier's parent company, if applicable? (If inapplicable, simply type n/a.)

n/a

97b. What is the term of the policy?

n/a

97c. Who does the insurance cover? (Choose all that apply.)

Not applicable

97d. If other, please identify:

98. If you feel that you would like to provide additional details on any of the given answers, feel free to provide any additional comments here (maximum of 5,000 characters) or prepare an additional document identifying the question(s) you are commenting on and upload the document under 98a:

98a. Upload document here:

PUBLIC AVAILABILITY

99. The AGC encourages respondents/depositories to make their answers to this questionnaire publicly available. Will you be making your response publicly available? (For additional guidance, please review the help feature to this question.)

Yes (please answer 99a)

Question 99 Help: The AGC suggests that you consider making your completed questionnaire available to the public - either in response to requests or, if possible, by posting it on a web site. The information provided in response to the questionnaire will be used by the member banks of the Association in compiling Rule 17f-7 risk analyses and may also be furnished by members to U.S. investment companies. The information may also be furnished to other types of institutional investors, or to other parties who have an interest in the securities markets of various countries. However, the Association does not intend to release questionnaire responses directly to the general public. (For these reasons, the members of the Association cannot assure that responses will be treated as confidential or that responses will not become public.)

99a. If yes, how will you be making it publicly available: (Choose all that apply.)

Web site (please answer 99b), By individual request with depository (please answer 99c)

99b. Please provide web site address of publicly available questionnaire:

http://www.bankofgreece.gr/BogDocumentEn/Bog_Questionnaire.pdf

99c. Please provide name of contact at depository who has been designated to receive such requests (then please answer 99d).

Mrs. Dimitra Giortsiou

99d. How would they prefer to be contacted? (Choose all that apply.)

By e-mail (please answer 99h)

99e. Please provide telephone number:

99f. Please provide facsimile number:

99g. What is the preferred street address for mailing requests?

99h. What is the preferred e-mail address for such requests:

sec.securities@bankofgreece.gr

99i. If other, please describe how you will be making the questionnaire publicly available:

99j. Please be sure your contact details are updated. Your contact information is located in the first section of Part One within this questionnaire.

You have reached the end of the questionnaire. Please be sure to print your responses and review them prior to changing Datasheet Progress to "Completed" under Part Two. (To print, select the printer friendly link at the top of the questionnaire.) When you are prepared to submit your answers, please return to Part One and Part Two of the questionnaire and change Datasheet Progress to "Completed". The members of The Association of Global Custodians thank you for your time and for your helpful response.

Please provide any comments you have regarding the questionnaire.