

RECORD KEEPING POLICY

PIRAEUS BANK



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RECORD KEEPING POLICY

1. Scope

This policy has been developed in accordance with the provisions of the law No. 4514/2018 and the delegated Regulation 2017/565.

The files containing the respective rights and obligations of the Group and of the customer service agreement or the conditions under which the Bank provides services to the client, at least maintained throughout the duration of the relationship with the client.

2. How to Keep Records

The files are kept in a medium, which allows the storage of information in a way accessible for future reference, in form and in a manner, that:

- the Bank of Greece and the Hellenic Capital Market Commission may have easy access to these files and can replicate based on these key stages of processing each transaction,
- it is possible to ascertain easily any corrections or other modifications, as well as the contents of files before these corrections or amendments,
- the files cannot be altered or modified,
- to enable information technology or any other effective exploitation when the analysis is not easy because of the volume and nature of these and
- the relevant company comply with the record-keeping requirements regardless of the technology used.

3. List of Records

The Group observes, inter alia, records concerning:

- information provided to clients about the relevant entity and protection of client
- clients' identity and classification
- client's contracts and any document drawn up by agreement between the client and the relevant entity which set out the rights and obligations of the parties
- information concerning clients' compatibility testing and specifically:
 - the results of the assessment
 - any warning given to the client in case the investment product or service assessed is non-compatible with the knowledge and experience of the client, if, despite the warning, the client requests the execution of the investment product, and if the Group company accepts the execution of the transaction
 - any notice given to the client if the client has not provided sufficient information regarding his knowledge and experience, if, despite the warning, the client requested the execution of and if the relevant group company accepted the execution of it
- information about appropriateness assessment
- client orders and decisions to transact on financial instrument
- transactions on financial instruments realized on own account
- handling clients orders
- aggregation and allocation of orders
- aggregation and allocation of clients' transactions and transactions on own account
- information about client's limit orders
- the orders given in the context of portfolio management and the orders received in the context of reception and transmission of orders as well as appropriateness tests carried out
- the execution of client orders and the execution of transactions for own account
- transmission of orders received by the Bank
- Update – upon client's request – on the entities to receive or transmit orders for execution
- copy of periodic information sent to clients, which will certify the content and their mailing
- the client's financial instruments .

- the clients' financial instruments on which the Group can conclude agreements for securities financing transactions, or which may otherwise use
- the clients' funds
- client information/communication with clients
- any complain concerning the provision of investment services to clients and the measures taken for its resolution
- information about the Group and its services, financial instruments and the protection of client assets
- Group's communication policy
- investment research disseminated by the company in a durable medium
- business activities and internal organization of the Group
- the procedures and written reports of Compliance Units, Risk Management and Internal Audit
- the investment services or actions giving rise to detrimental conflict of interest
- any notices to clients concerning conflicts of interest
- cases in which the company did not provide investment service because it was not able to effectively manage conflict of interest
- customer complaints and taking relevant measures to deal with them
- personal transactions
- information communicated to clients on inducements
- investment advice in a non-independent capacity and in particular:
 - time and date for the provision of investment advice
 - financial instrument
 - appropriateness assessment provided by the related company to the client and any notice given to the client in case the investment service or product to be provided is not suitable for the client
- the content and time of instructions received by clients in connection with underwriting or placement of financial instruments
- the decisions which allocate the financial means obtained for each activity where justified and clearly recorded the way the distribution of financial instruments per client investor
- costs and associated charges
- advertising announcements /commercials
- any information sent to the client following a relevant request

4. Record Keeping of Client Orders and Trading Decisions

For each order received from the client and for each trading decision in the context of portfolio management service, the Group registers immediately to file the following information, to the extent that this information is related to the relevant order or trading decision:

- The client name and designation.
- The name and designation of any relevant person acting on behalf of the client.
- A designation to identify the trader (Trader ID) responsible within the Group for the investment decision.
- A designation to identify the algorithm (Algo ID) responsible within the Group for the investment decision.
- Buy/sell indicator.
- The instrument identification (unique code or name of the instrument).
- The unit price and price notation.
- Price
- Price multiplier
- Currency 1
- Currency 2
- Initial quantity and quantity notation
- Validity period
- Type of order
- Any other details, conditions and particular instructions from the client specifying how the order is to be executed
- The date and exact time of the receipt of the order or the date and exact time of when the decision to deal was made.

5. Record Keeping of Transactions and Orders Processing

Immediately after the execution of the client order or, in the case that the Group transmits the order to a third party for execution, immediately after receiving confirmation of the execution of the order, the Group registers the required information about the transaction, including the information laid down in annex IV of the delegated Regulation (EU) 2017/565.

