



ALPHA BANK



## **ANNUAL PUBLICATION OF INFORMATION ON THE IDENTITY OF EXECUTION VENUES AND ON THE QUALITY OF EXECUTION**

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**(According to article 27 par. 6 of Law 4514/2018 (MiFID II) and Delegated Regulation (EU) 2017/576)**

**REFERENCE YEAR: 2019**

### GENERAL INFORMATION

Alpha Bank A.E., when executing Customer orders on financial instruments in the context of investment services, takes adequate measures to achieve the best possible result for its Customers, ensuring the prompt, fair and expeditious execution of their orders, relative to other Customer orders or the trading interests of the Bank. This obligation applies to both Retail and Professional Customers.

To this extent Alpha Bank A.E. discloses the offered price of the requested financial instrument, while the commission is charged on this price and notified to the Customer prior to the conclusion of the transaction.

Particularly, when executing orders on OTC products, including special products (such as derivatives), Alpha Bank A.E. controls and documents the fairness of the price proposed to the Customer. Such control is performed prior to the order's execution and consists of the collection of market data used for the estimation of the price, comparison between similar or comparable products - wherever possible.

Finally, all orders concerning the conclusion of transactions on financial instruments listed to the Hellenic Exchanges, are transmitted for execution via Alpha Finance Investment Services S.A, an Alpha Bank A.E. Group company.

For the year 2019 and the class of Money Market Instruments the segmentation of execution venues was between Alpha Bank A.E. and the Ministry of Finance, as issuer of the Treasury Bills.



Class of Instrument		Shares (Retail Clients)				
Notification if < 1 average trade per business day in the previous year		N				
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
1	Alpha Finance S.A. (LEI: 213800REJK69YVJTMC76)	100%	100%			

Class of Instrument		Shares (Professional Clients)				
Notification if < 1 average trade per business day in the previous year		N				
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
1	Alpha Finance S.A. (LEI: 213800REJK69YVJTMC76)	100%	100%			



Class of Instrument		Bonds (Retail Clients)				
Notification if < 1 average trade per business day in the previous year		N				
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
1	Alpha Bank A.E. (LEI: 5299009N55YRQC69CN08)	100.00%	100.00%	100.00%	0.00%	0.00%
Class of Instrument		Bonds (Professional Clients)				
Notification if < 1 average trade per business day in the previous year		Y				
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
1	Alpha Bank A.E. (LEI: 5299009N55YRQC69CN08)	100.00%	100.00%	100.00%	0.00%	0.00%

Class of Instrument		Money Market (Retail Clients)				
Notification if < 1 average trade per business day in the previous year		N				
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
1	Alpha Bank A.E. (LEI: 5299009N55YRQC69CN08)	93.53%	28.14%	100.00%	0.00%	0.00%
2	Ministry of Finance (LEI: 2138003EKTMKZ5598902)	6.47%	71.86%	100.00%	0.00%	0.00%
Class of Instrument		Money Market (Professional Clients)				
Notification if < 1 average trade per business day in the previous year		Y				
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
1	Ministry of Finance (LEI: 2138003EKTMKZ5598902)	0.00%	0.00%	0.00%	0.00%	0.00%
2	Alpha Bank A.E. (LEI: 5299009N55YRQC69CN08)	0.00%	0.00%	0.00%	0.00%	0.00%



Class of Instrument		Swaps, forwards and other interest rate derivatives (Retail Clients)				
Notification if < 1 average trade per business day in the previous year						
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
1	Alpha Bank A.E. (LEI: 5299009N55YRQC69CN08)	100%	100%	100%	0%	0%

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Class of Instrument		Swaps, forwards and other currency derivatives (Retail Clients)				
Notification if < 1 average trade per business day in the previous year						
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
1	Alpha Bank A.E. (LEI: 5299009N55YRQC69CN08)	100%	100%	100%	0%	0%

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Notification if < 1 average trade per business day in the previous year						
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
1	Alpha Bank A.E. (LEI: 5299009N55YRQC69CN08)	100%	100%	100%	0%	0%





Class of Instrument		Options and Futures admitted to trading on a trading venue (Retail Clients)				
Notification if < 1 average trade per business day in the previous year						
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
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Class of Instrument		Commodities derivatives and emission allowance derivatives (Retail Clients)				
Notification if < 1 average trade per business day in the previous year						
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
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Class of Instrument		Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities) (Retail Clients)				
Notification if < 1 average trade per business day in the previous year						
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
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Class of Instrument		Other instruments (Retail Clients)				
Notification if < 1 average trade per business day in the previous year						
Top five execution Brokers ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive order	Percentage of aggressive orders	Percentage of directed orders
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Notification if < 1 average trade per business day in the previous year						
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