

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

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

REFERENCE YEAR: 2021
(Referenced Period 17.4.2021 – 31.12.2021 following the corporate transformation of Alpha Bank A.E.)

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.

With regards to the asset class of Money Market Instruments, the segmentation of execution venues was performed between Alpha Bank A.E. and the Ministry of Finance, as issuer of the Treasury Bills.

To be noted that, the present publication refers to the period 17.4.2021 – 31.12.2021, following the corporate transformation of Alpha Bank Group.

	Class of Instrument		Shares (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	
,	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							
	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							
	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: 213800DBQIB6VBNU5C64)	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							
	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: 213800DBQIB6VBNU5C64)	0.00%	0.00%	0.00%	0.00%	0.00%	

	Class of Instrument		Money Market (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: 213800DBQIB6VBNU5C64)	100.00%	100.00%	100.00%	0.00%	0.00%	
2	Ministry of Finance (LEI: 2138003EKTMKZ5598902)	0.00%	0.00%	0.00%	0.00%	0.00%	

	Class of Instrument		Money Market (Professional 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	Ministry of Finance (LEI: 2138003EKTMKZ5598902)	0.00%	0.00%	0.00%	0.00%	0.00%	
2	Alpha Bank A.E. (LEI: 213800DBQIB6VBNU5C64)	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: 213800DBQIB6VBNU5C64)	100%	100%	100%	0%	0%		

	Class of Instrument		Swaps, forwards and other interest rate derivatives (Professional 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: 213800DBQIB6VBNU5C64)	100%	100%	100%	0%	0%	

	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: 213800DBQIB6VBNU5C64)	100%	100%	100%	0%	0%		

	Class of Instrument		Swaps, forwards and other currency derivatives (Professional 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: 213800DBQIB6VBNU5C64)	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	Options and Futures admitted to trading on a trading venue (Professional 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
Alpha Finance S.A. (LEI: 213800REJK69YVJTMC76)	100%	100%			

		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
	1	Alpha Bank A.E. (LEI: 213800DBQIB6VBNU5C64)	100%	100%	100%	0%	0%

Class of Instrume	Class of Instrument Commodities derivatives and emission allowance derivatives (Professional Clients)				
Notification if < 1 average business day in the previ					
Top five execution Brokers terms of trading volu (descending order	mes traded as a	of volume percentage that class	ed as a of total in		Percentage of directed orders
1 Alpha Bank A (LEI: 213800DBQIB6\		0% 100	100%	0%	0%

	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	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities) (Professional 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	
•	Alpha Finance S.A. (LEI: 213800REJK69YVJTMC76)	100%	100%				

	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
1	Alpha Bank A.E. (LEI: 213800DBQIB6VBNU5C64)	100%	100%	100%	0%	0%

	Class of Instrument	Other instruments (Professional 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: 213800DBQIB6VBNU5C64)	100%	100%	100%	0%	0%