



HSBC France, Athens Branch – October 2018

RBWM Best Execution Policy

In accordance with existing regulations, HSBC France, Athens Branch ("the Bank") has adopted an order execution policy for financial instruments, and takes all sufficient measures to obtain the best possible result for its clients when transmitting orders received from these for execution through duly authorized intermediaries.

I.1 Scope:

This policy applies to HSBC retail clients, within the meaning set out by the Law and/or all applicable regulations, such as the Markets in Financial Instruments Directive (MiFID II Directive), pertaining to RBWM segment (retail banking).

It applies to orders initiated within the receipt/transmission service for financial instruments ordered by clients

I.2 Financial instruments affected

The best execution principle applies to orders for financial instruments that are covered by the Law and/or all applicable regulations, such as MiFID II Directive (and are available for trading by the Bank's intermediaries and/or other parties (including any company outside of the HSBC Group)). For financial instruments that are not covered, HSBC will continue to abide by the principles of a general obligation to act honestly, fairly and professionally in the best interest of clients and with due regard for market integrity.

I.3 Factors and criteria concerning order execution

To obtain the best possible result when executing client orders, the bank takes the following factors into account:

- The total cost settled following order execution (price of the financial instrument in question, execution-related costs including commissions, execution venue fees, clearing and settlement fees along with other fees that may be paid to third parties involved in order execution)
- The price at which the order could be executed
- The speed and likelihood of execution and of order clearing and settlement
- Order size and type
- Or all other considerations relating to the order's execution.

To determine the importance of the above factors, the Bank takes into consideration criteria such as the following:

- The total cost that takes precedence for non-professional clients
- The properties of the orders received
- The properties of the client

The properties of the financial instruments that are the subject matter of the particular order

I.4 - Handling of specific instructions

When you provide a specific instruction as regards the method of execution of your instruction, we

shall try where possible to follow it. However, we note that when asked to act based on your specific instructions, we may not execute your instruction if it is not in agreement with our Bank's Execution Policy. If the Customer provides a specific instruction, it shall be deemed that we discharged our obligation to take all reasonable measures in order to achieve the Best Execution of his instruction, but as regards to the aspects of the execution that are not covered by the specific directive, we shall proceed with the execution of the instruction according to our Execution Policy. Nonetheless, the Bank shall abide by the principles of a general obligation to act honestly, fairly and professionally in the best interest of clients and with due regard for market integrity.

I.5 Transactions outside regulated markets or outside a multilateral trading facility (MTF)

When execution on a regulated market or a multilateral trading facility (MTF) is impossible, especially with regard to illiquid or largely over-the-counter financial instruments, orders may be traded outside a regulated market or an MTF by the intermediaries selected by the Bank.

If none of these intermediaries is able to trade and with the client's consent, the Bank shall do its best to execute the client's order through its trading office. This order shall be handled under the terms of a specific instruction.

These transactions present different risks than those executed on regulated markets or on MTFs, which primarily relate to the risk of counterparty default or the absence of order books.

II. Information for clients

Information on order execution

Following order execution, the client systematically receives a notice of transaction indicating the properties of the executed order. Upon request, the Bank will be in a position to document to its clients that the quality of their order execution is in accordance with the Bank's order execution policy.

III. List of Execution Venues

Table of execution venues currently selected by the bank:

Financial Instruments	Execution Venues
European / International bonds	Bloomberg MTF, through HSBC Global Markets
UCITS Mutual Funds	Corresponding Fund Management Company designated execution venue
Structured Deposits	<ol style="list-style-type: none"> 1. HSBC Global Markets 2. Special Market Makers as defined by applicable terms & conditions

IV. Best execution report (RTS 28)

The Markets in Financial Instruments Directive (MiFID II) provides that the Bank publish an annual report with data pertaining to the quality of order execution. This report includes information about the top five execution venues used for each category of financial instrument and type of client. In order to demonstrate best quality of execution, data and evaluation factors such as prices, costs, speed and likelihood of execution will be included in this report. This report will be published once a year on the website www.hsbc.gr.

V. Monitoring

For **mutual funds**, RBWM, through its HOST team, performs the monitoring of timely transmission with MF Company Cut Off times of client orders to the corresponding Fund Management companies.

In terms of Fixed Income (bonds) best execution obligations are described in the MiFID II Booking and Reporting Analysis – RTS 27 & 28 document as implemented following MiFID II implementation and Greek Branch transfer to HBFR.

For **bonds**, the below table, as recorded in the above mentioned document, depicts monitoring responsibilities:

Booking Model	Best Execution Monitoring
HBFR Greek Branch B/S, BtoB with HBFR	Off-market monitoring: HBFR Off-margin monitoring: HBGR, RBWM
HBFR Greece Branch B/S, BtoB with HBEU	Off-market monitoring: HBEU Off-margin monitoring: HBGR, RBWM

Off-market monitoring

- As RBWM bonds orders are transmitted, through the local Global Markets desk to the relevant HSBC Global Markets entity (HBFR or HBEU) for execution, off-market monitoring is handled accordingly by the relevant entity, as described in the document mentioned above. In case of breaches, justifications are provided by HBFR or HBEU Global Markets.

Off-margin monitoring

- RBWM monitors that commissions taken are as per the applicable bank's pricing policy available in the Bank's pricing list, monitored locally by RBWM and reviewed within the local Wealth Management Oversight Committee (WMOC). In case of deviations, these will be brought to the attention of the local and/or French RMM.

VI. Policy Review Cycle

This policy is reviewed on an annual basis and additionally whenever a material change, defined as a change that affects the ability of RBWM to obtain the best possible result for a client on a consistent basis, occurs. Examples of material change would be occurrences of emergence and significant reliance upon a new execution venue, the closure of an existing execution venue that is explicitly included in this policy and upon which significant reliance is placed, the introduction of a new product or service that is material in nature to RBWM and its clients, etc.