

INITIAL PUBLIC OFFERINGS

Greece



Initial Public Offerings

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Quick reference guide enabling side-by-side comparison of local insights into initial public offerings (IPOs), including market overview (size, issuers and exchanges); rulemaking and enforcement bodies; listing requirements (authorisation process, prospectuses, publicity and marketing, enforcement); timetable and costs; corporate governance (typical requirements, allowances for new issues, takeover rules and anti-takeover devices); foreign issuers (special requirements and selling foreign issues to domestic investors); tax issues; investor claims (fora, class actions, claims, defendants and remedies); and recent trends.

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MARKET OVERVIEW

Size of market

What is the size of the market for initial public offerings (IPOs) in your jurisdiction?

Over the past few years, during the economic crisis in Greece, few IPOs took place. All of the issuers were Greek and mostly entities that were required by law to list their shares on a regulated market (eg, Greek real estate investment companies). Therefore, we do not believe the size of the IPOs during those years is representative for the Greek market.

During the past 12 months, before the invasion of Ukraine by Russia, the number and volume of capital market transactions, particularly secondary equity issues and debt issues, were significantly increased and IPOs were again on the agenda; such activity came to a halt owing to the outbreak of war in Ukraine, but is expected to resume as soon as market conditions improve.

Law stated - 16 May 2022

Issuers

Who are the issuers in the IPO market? Do domestic companies tend to list at home or overseas? Do overseas companies list in your market?

There have been few IPOs during the past few years and those IPOs have mainly been in respect of Greek real estate investment companies.

Domestic companies tend to list their shares on the home market. However, during the past few years, following the entry into force of Law 3777/2009, which transposed into Greek law Directive 2005/56/EC on cross border mergers between limited liability companies governed by the law of a member state of the European Union (EU member state), the market for dual listings has developed. Based on precedents, dual listings are more often used by entities of the same group and mostly in cases of a change of registered seat of a Greek entity to another EU member state.

It is not usual for foreign companies to list their shares on the Greek market.

Law stated - 16 May 2022

Primary exchanges

What are the primary exchanges for IPOs? How do they differ?

In Greece, there is currently only one regulated market for IPOs, the regulated market of the Athens Exchange (ATHEX).

Law stated - 16 May 2022

REGULATION

Regulators

Which bodies are responsible for rulemaking and enforcing the rules on IPOs?

The Hellenic Capital Market Commission (HCMC) is the national competent authority to review and approve the prospectus that is required to be published in the case of a public offer of transferrable securities in Greece and the listing of such securities on the Athens Exchange (ATHEX), as provided for by Regulation 1129/2017 (the Prospectus Regulation) on the prospectus to be published when securities are offered to the public or admitted to trading on a

regulated market. The HCMC also supervises the overall IPO process and the compliance of the IPO issuer and other financial intermediaries involved in the IPO process with relevant Greek capital markets law rules.

Furthermore, the Hellenic Exchanges SA, the company operating the ATHEX, is the body responsible for the approval of the listing and admission to trading of the transferable securities offered in an IPO as well as for the enforcement of the obligations imposed on the IPO issuer according to the ATHEX Regulation.

Law stated - 16 May 2022

Authorisation for listing

Must issuers seek authorisation for a listing? What information must issuers provide to the listing authority and how is it assessed?

An issuer (Greek or foreign) that seeks to have its shares listed and admitted to trading on the ATHEX must apply to Hellenic Exchanges – Athens Stock Exchange SA (HELEX) and obtain the relevant approval. The process vis-à-vis HELEX for the listing authorisation is provided for by the ATHEX Regulation and Decision no 28 of the Board of Directors of HELEX, as amended (the Listing Decision). According to the Listing Decision, the main documentation that needs to be submitted to HELEX are: the issuer's listing application, an information document called the corporate profile and the listing eligibility questionnaire that is filled in and submitted by the financial intermediaries engaged as underwriters in the IPO. The contents of the corporate profile and the listing eligibility questionnaire mainly includes information on:

- the legal status of the issuer and the securities to be listed;
- the background and business history of the issuer;
- the organisational structure of the issuer's group of companies (if any), its shareholding structure and any conflicting activities pursued by the controlling shareholders or persons discharging managerial duties in the issuer either directly or through companies that are not controlled by the issuer;
- the issuer's investment plans (including investments to be financed by the capital that will be raised through the IPO);
- any dependence that the issuer has with certain suppliers or customers;
- the status of any tax liabilities or the tax status of the issuer based on recent tax audits performed by the competent authority or a special tax audit report provided by an expert;
- the corporate governance standards that the issuer applies;
- the current performance of the issuer in the relevant market sector, as well as recent trends and other key factors that could influence its future performance.

Special types of issuers (such as insurance undertakings, construction companies or shipping companies) are expected to provide HELEX with further information tailored to their specific activities.

Both the corporate profile and the listing eligibility questionnaire are submitted to HELEX without them being published at any stage of the IPO.

The listing authorisation is granted, if the conditions set out in Law 3371/2005, which has transposed Directive 2001/34 on the admission of securities to the official stock exchange listing and on information to be published on those securities (the Listing Law), and in the ATHEX Regulation, are met. The listing conditions are the following:

- the shares to be listed must be fully paid-up and freely negotiable;
- the issuer's own funds must not be lower than €3,000,000 on a consolidated basis (if applicable), or on corporate basis;

- the issuer must have published at least three previous financial years using either International Financial Reporting Standards or (if a foreign issuer) other equivalent financial reporting standards (for example, US GAAP). An exemption, though, for newly established companies can be granted by HELEX but in that case certain other information may be requested to understand the financial status of the entity to be issued;
- with respect to profitability, either the issuer must have profits before tax for the previous three years not lower than €2,000,000 and be profitable (before taxes) for the last two financial years at least, or the issuer's three-year EBITDA must be at least equal to €3,000,000 and the issuer's EBITDA for the previous two financial years must have been positive;
- with respect to the free float requirement, 25 per cent of all of the shares of the same category to be listed must be allocated to at least 300 persons holding less than 5 per cent of the shares to be listed, albeit subject to certain exceptions;
- tax audits must have been conducted in relation to all financial years for which financial statements have been published otherwise a relevant tax audit report must be provided;
- the issuer must be compliant with applicable corporate governance requirements, namely, Law 4706/2020 (the Corporate Governance Law), article 44 of Law 4449/2017 on the Audit Committee and HCMC Decision 5/204/2000, as amended; and
- the total value of the shares to be listed must not be lower than €2 million.

HELEX has a certain margin of appreciation in assessing listing applications, but the rules and the process are clear and transparent.

According to the ATHEX Regulation, if the issuer is not a Greek entity then all listing requirements above apply to the foreign *mutatis mutandis*.

Further to the listing process *vis-à-vis* HELEX, the issuer must also seek the approval of the Prospectus required by the Prospectus Regulation. The HCMC reviews the Prospectus as to the inclusion of the minimum information or content required according to the relevant provisions of the Prospectus Regulation. It can, though, exercise discretion and ask for further information to be included, even if such information is not explicitly included in one of the Annexes of the Prospectus Regulation outlining the minimum prospectus content per type of issuer, offering and securities to be offered. Such requests are made by the HCMC, if the HCMC considers that the additional information is important for potential investors to have in order to make an informed investment decision.

Law stated - 16 May 2022

Prospectus

What information must be made available to prospective investors and how must it be presented?

The prospectus is the only information document that the IPO issuer is obliged by law to make available to the public, together with the statutory announcements that the issuer must publish on the publication and access to the approved prospectus and the initiation, process and completion of the public offer.

The minimum content and form of a prospectus is provided for by the Prospectus Regulation and further specified in the relevant delegated acts. There is no local rule or guidance issued by the HCMC; the HCMC reviews the content of the prospectus based on the Guidelines and Questions and Answers documents as well as other clarificatory statements published from time to time by the European Securities and Markets Authority (ESMA).

The content of an IPO prospectus is comprised of three parts:

- The summary of the prospectus: it must be drafted in a succinct and non-technical language. Its content is

strictly provided for by the relevant European law rules and there can be no deviation from the relevant guidance.

- The registration document includes:
 - a description of the business activity of the issuer and the relevant product and geographic market in which the issuer operates;
 - a discussion and analysis of the key items of the issuer's financial statements and key factors affecting the issuer's financial status and operation;
 - other financial information provided by certain key performance indicators used by the issuer, albeit not defined in the IFRS, namely the financial reporting standards the IPO issuer is using;
 - a concise analysis of the risk factors relevant to the issuer's business activity, economic and regulatory (if any) environment, shareholders' and management structure as well as the type of securities to be listed and the market on which they will be listed;
 - the investment (if applicable) strategy and targets of the issuer;
 - its shareholding structure (to the extent this is information publicly disclosed under other European or local law rules);
 - the operation of its management, administrative, supervisory and auditing bodies, the corporate governance regime to which the issuer is subject and important information on the natural persons participating in the issuer's managerial, administrative supervisory and auditing bodies;
 - a description of the main terms of the contracts that are material for the business activity, results of operation and in general the financial status of the issuer;
 - certain information on related-party transactions; and
 - any profit forecasts and estimates, if applicable.
- The securities note: it describes the characteristics of the securities to be offered, mainly, rights attached to them, including the tax implications deriving from the acquisition and holding of such securities, the structure and other elements of the offering, including the persons, agreements and costs involved in the offering, as well as whether the offering will be followed by stabilisation acts.

All the information included in the prospectus (taking into account the minimum required content by the Prospectus Regulation) must be complete and accurately presented in a non-misleading manner and without omissions of important information. Pursuant to HCMC Decision 1/892/13.10.2020, in offerings where Greece is considered the home member state, the Prospectus may be drafted either in Greek or in English. However, the summary of the prospectus must also be drafted in Greek, unless the issued shares are admitted to trading in one or more EU jurisdictions other than Greece.

Law stated - 16 May 2022

Publicity and marketing

What restrictions on publicity and marketing apply during the IPO process?

The relevant European law rules do not explicitly provide for a general black-out period during which the IPO issuer would be prohibited from issuing advertisements. However, pursuant to Law 4706/2020 implementing the Prospectus Regulation, any advertisement related to marketing of the IPO itself can only take place after the approval of the prospectus by HCMC.

Advertisements related to the IPO need to be submitted in advance to HCMC, as they are included in the list of supporting documents for the review and approval of the prospectus, and they must comply inter alia with the following general principles pursuant to article 22 of the Prospectus Regulation:

- advertisements must be clearly identifiable as such and state where the prospectus is or will be available; and
- any information included in the advertisement must be accurate, non-misleading and consistent with the prospectus published or to be published.

Law stated - 16 May 2022

Enforcement

What sanctions can public enforcers impose for breach of IPO rules? On whom?

According to Law 4706/2020, if a public offer is performed without the prior publication of a prospectus, the HCMC may impose administrative sanctions on any person that deliberately markets or otherwise offers to the public transferable securities, including:

- a public statement;
- an order to cease the infringement;
- suspension or revocation of authorisation;
- a temporary or permanent prohibition for natural persons to participate in the management of listed entities; and
- an administrative fine of at least twice the amount of the profits gained or losses avoided because of the infringement, if relevant, which is capped (ie, up to €5 million or 3 per cent of the total annual turnover for legal persons, and up to €1 million for individuals).

The HCMC takes into account a number of factors, to impose sanctions, such as the gravity and duration of the infringement, the degree of fault, the financial position of the liable person, the impact on the interests of retail investors, etc.

To the extent that the relevant behaviour also constitutes a violation of the market abuse rules, the criminal and administrative sanctions provided for by Law 4443/2016 may also be imposed on the persons liable for the relevant actions.

Law stated - 16 May 2022

TIMETABLE AND COSTS

Timetable

Describe the timetable of a typical IPO and stock exchange listing in your jurisdiction.

The vast majority (if not all) of the IPOs of Greek issuers have taken place through a public offer in Greece combined with an international institutional offering in the European markets and based on exemptions referring to offers and sales of securities outside the United States.

The timetable of an IPO, therefore, depends on the structure of the offering (mainly whether it will be structured as a purely Greek retail offer or a combined offering), whether it is a primary or secondary offering and other commercial considerations, and the readiness of the entity to be listed to comply with the listing requirements imposed by the Athens Exchange (ATHEX) Regulation and other capital markets law rules.

A typical, as above, IPO timetable would include:

- A preparation phase of around two months in which the issuer and its advisors would proceed with an internal restructuring in order for the IPO issuer to comply with the new corporate governance standards, including

financial reporting and draft the requisite documentation (ie, the corporate profile and the prospectus).

- Submission of the corporate profile to Hellenic Exchanges – Athens Stock Exchange SA (HELEX). The minimum content of the corporate profile is provided for by the Listing Decision. The review process of the corporate profile is run by HELEX, which is very responsive and cooperates with issuers to expedite the listing process.
- Submission of the prospectus to the Hellenic Capital Market Commission (HCMC). According to the Prospectus Regulation, the HCMC must approve the prospectus within a defined period of time. However, it is not possible to pre-determine the expiration of the relevant deadline, because in most cases the HCMC has commented on the draft of the prospectus submitted to the HCMC. In such a case, further time is required by the issuer and the HCMC to prepare and review, respectively, the revised draft that addresses the HCMC comments. The usual time frame for the approval of a well-prepared prospectus is around two months.
- For the HCMC to approve the prospectus, HELEX must have confirmed fulfilment of the listing criteria as provided for by the Listing Law and the ATHEX Regulation, except for the free float requirement.
- Once the prospectus is approved by the HCMC, the IPO issuer must proceed with its publication and the publication of other statutory announcements.
- From there on, the timetable depends on whether the subscription price for the shares to be offered or a subscription price range is mentioned or not in the approved prospectus. Pursuant to article 21(1) paragraph 2 of the Prospectus Regulation, the Prospectus must be made available to the public at the latest six business days before the end of the public offer. Based on the currently applicable Greek market practice the duration of a public offer is three business days.
- Within two business days of the completion of the public offer, the underwriters must announce the final allocation of the shares offered, the amount of money raised and certain other information on the offer.
- Provided the free-float requirement is met, ATHEX approves the listing of the shares and subsequently (after further documentation is provided) also decides the commencement of trading. Provided there are no other pending items or extraordinary circumstances, the commencement of trading of the shares offered can take place on the second or third business day after the payment of the total offer price. It is advisable that the anticipated timeline is also discussed and confirmed ad hoc with HCMC and HELEX.

Law stated - 16 May 2022

Costs

What are the usual costs and fees for conducting an IPO?

The cost of the IPO is born by the issuer and deducted from the IPO's proceeds. The costs of an IPO may vary and include:

- the financial, accounting and legal due diligence costs;
- the underwriters' commission fee;
- ATHEX's fees regarding the listing process;
- the HCMC fees for review and approval of the prospectus and granting permission to perform the public offer in Greece; and
- costs related to the IPO marketing, including the publication of the prospectus, publication of statutory announcements and other press releases and marketing material, hosting events for investors' and analysts' meetings, and other marketing venues.

Law stated - 16 May 2022

CORPORATE GOVERNANCE

Typical requirements

What corporate governance requirements are typical or required of issuers conducting an IPO and obtaining a stock exchange listing in your jurisdiction?

One of the listing requirements imposed by the Athens Exchange (ATHEX) Regulation is for the issuer to comply with the corporate governance regime applicable to issuers to be listed on the ATHEX.

In particular, Law 4706/2020 (the Corporate Governance Law) imposes three main sets of obligations to the issuer:

- With respect to the composition of the issuer's board of directors, it shall be comprised of executive, non-executive and independent non-executive members, with the status of each member being defined by the board itself apart from the independent non-executive members who are elected as such by the general meeting. At least a third, and, in any case, no less than two, of the IPO issuer's members must be independent non-executive members, namely they must fulfil the independence criteria set out in the Corporate Governance Law, currently pertaining mainly to a minimum shareholding interest that an independent non-executive member is permitted to hold in the issuer and the absence of material business relationships with the IPO issuer or other type of close connections with the latter or its management (eg, being the spouse or child of one of the members of the board of directors). Prior to their appointment, all members of the board must fulfil the eligibility criteria provided in the relevant suitability policy, regarding their skills and reputation.
- With respect to the internal organisation of the IPO issuer, the latter is obliged to adopt and implement an internal regulation of operation, the minimum content of which is provided for by the Corporate Governance Law. Additionally, the Corporate Governance Law provides for the establishment of a remuneration committee, mainly responsible for the submission of proposals to the Board on the remuneration policy of board members and executive directors, as well as a nominations committee, which provides recommendations to the board for eligible board member candidates.
- The IPO issuer is also obliged to establish and operate an independent internal audit service and appoint an internal auditor or head of the internal audit service who will be fully and exclusively employed as such by the issuer. The internal audit service must be assigned with specific duties, including the issuance of quarterly reports to be submitted to the board of directors of the issuer. The internal auditor must have full access to all books and information of the issuer.

Furthermore, in accordance with Law 4449/2017, the issuer must have an audit committee consisted of its majority by members, including its chairman, who are independent of the IPO issuer. The audit committee is responsible, inter alia, for putting forward the proposal for the appointment of the statutory auditor and for monitoring the audit plan and it must cooperate with and supervise the external and internal audit processes. The audit committee is also granted unlimited and full access to all books and information of the issuer.

The issuer is also obliged, pursuant to the Corporate Governance Law, to have an investor or shareholders relations and corporate announcements departments.

Law stated - 16 May 2022

New issuers

Are there special allowances for certain types of new issuers?

There are no local law allowances or other exceptions apart from the relevant special European law rules on small and medium-sized enterprises (SMEs) and certain growth companies that may be subject to a simplified regime as regards the content of the prospectus to be published in the case of capital raising through a public offer. In accordance with the Commission Delegated Regulation (EU) 2019/980, the process for the publication of an EU growth prospectus is more time and cost efficient, as its content is reduced, less technical and more standardised.

However, since the requirements for such allowances refer to securities that will not be admitted to trading on a regulated market, the use of such allowance in the case of an IPO is precluded, unless it is used by the relevant issuer to raise capital and have its shares admitted on the Greek multilateral trading facility, the Alternative Market, at a first stage, with a view to being listed on the regulated market of the ATHEX at a later stage.

Law stated - 16 May 2022

Anti-takeover devices

What types of anti-takeover devices are typically implemented by IPO issuers in your jurisdiction? Are there generally applicable rules relevant to takeovers that are relevant?

It is not usual for anti-takeover devices to be used in the context of an IPO in Greece.

Law stated - 16 May 2022

FOREIGN ISSUERS

Special requirements

What are the main considerations for foreign issuers looking to list in your jurisdiction? Are there special requirements for foreign issuer IPOs?

The performance of a public offer in Greece or the listing of securities on the Athens Exchange (ATHEX) triggers the approval requirements discussed in this chapter irrespective of whether the issuer of the securities or the person offering the relevant securities are Greek entities or not.

If the IPO issuer is a European entity, then the relevant prospectus will be reviewed and approved by the competent authority of the member state in which the IPO issuer maintains its registered seat. After its approval, the prospectus will be passported in Greece for the performance of the public offer and the listing on the ATHEX. If the IPO issuer is a third-country entity, then the Hellenic Capital Market Commission (HCMC) remains the competent authority for the review and approval of the prospectus.

There are no special requirements applying with respect to foreign IPO issuers and the ATHEX listing requirements apply mutatis mutandis to foreign issuers. That said, ATHEX has the power to deny non-EU issuers the admission to trading, if the issuer has failed to list its shares in its country of origin or could not list them owing to reasons related to the protection of investors.

A foreign issuer considering listing its shares on the ATHEX should take into account the following:

- the shares to be listed must be eligible (both pursuant to the respective governing law of the securities and the relevant constitutional documents of the issuer) to be held in book-entry form in an electronic registry outside the jurisdiction of the issuer either pursuant to their dematerialisation or immobilisation;

- the issuer will need to comply with local corporate governance requirements;
- there may be increased administrative costs to ensure compliant dissemination of regulated information to investors in Greece; and
- the compliance risks and costs will be increased, although due to the capital markets law harmonisation among the EU members states, this may not be an issue for a European IPO issuer which is not Greek.

Law stated - 16 May 2022

Selling foreign issues to domestic investors

Where a foreign issuer is conducting an IPO outside your jurisdiction but not conducting a public offering within your jurisdiction, are there exemptions available to permit sales to investors within your jurisdiction?

Such an offer of shares to investors in Greece could be possible without triggering the offering restrictions discussed in this chapter, where any of the relevant exemptions provided for by Regulation 1129/2017 are available, namely when:

- the offer is addressed exclusively to qualified investors in Greece;
- the offer is addressed to fewer than 150 persons other than qualified investors;
- to the extent that such exemption could be applicable on shares, the denomination of the offer per unit amounts to at least €100,000; and
- the offer is addressed to investors who pay a consideration of at least €100,000 per investor.

Furthermore, to the extent that intermediaries, further to the issuer, are involved in the sale of the securities in Greece (eg, placement agents) any licensing requirements possibly triggered for them from the provision of investment services should be also reviewed under the rules of Directive 2014/65 (MiFID II), which has been transposed into Greek law almost verbatim by Law 4514/2018.

Law stated - 16 May 2022

TAX

Tax issues

Are there any unique tax issues that are relevant to IPOs in your jurisdiction?

Regulation 1129/2017 requires that the prospectus outline the tax implications for the holders of the shares to be offered in the context of an IPO but does not per se impose any tax obligations on the IPO issuer or the holders of the securities to be offered. Hence, the issuer's taxation continues to depend on the tax laws to which it is subject based on the business activity it pursues, the jurisdictions in which the relevant issuer operates (or is considered to operate) and generates income, and the transactions to which the issuer enters.

The only tax-related consideration that the IPO process itself could raise for an IPO issuer is the listing requirement provided for by the Athens Exchange (ATHEX) Regulation. More specifically, foreign issuers seeking listing on the ATHEX have to submit a tax audit report by an internationally renowned audit firm; in the case of consolidation, the tax audit report must refer to all companies included in the issuer's group.

Law stated - 16 May 2022

INVESTOR CLAIMS

Fora

In which fora can IPO investors seek redress? Is non-judicial resolution of complaints a possibility?

In the case of a Greek IPO issuer, IPO investors can bring their IPO-related claims before the competent courts, namely, the courts of the jurisdiction in which the IPO issuer has its registered seat or, in the case of an individual, his or her habitual residence, in accordance with generally applicable Greek civil procedural law rules.

Neither the generally applicable Greek civil procedural law rules or special capital markets law rules provide for an explicit exclusion of IPO-related claims from an arbitral resolution. However, there is no precedent of a prospectus or other IPO-related documentation issued by a Greek issuer that includes the possibility of a non-judicial resolution of complaints. That alternative has never been used in practice and, therefore, there is no case law on this matter.

Law stated - 16 May 2022

Class actions

Are class actions possible in IPO-related claims?

Currently no class action is possible in IPO-related claims. However, generally applicable Greek civil procedural law rules allow multiple investors to bring a joint action for claims with the same or substantially similar causes of action, arising from the same or a similar set of facts (joinder of plaintiffs). Unlike a class action, there will be no representative acting in the name and on behalf of all other claimants.

Law stated - 16 May 2022

Claims, defendants and remedies

What are the causes of action? Whom can investors sue? And what remedies may investors seek?

Law 4606/2020 imposes a statutory liability regime for deficiencies in the accuracy and completeness of the prospectus on the persons responsible for the content of the prospectus, namely the issuer, the members of the issuer's board of directors, as well as the financial advisors named as underwriters or in the prospectus.

These persons can also be sued on tort claims, in connection with infringements of Regulation 1129/2017 (the Prospectus Regulation) or other capital market law rules, such as Regulation 596/2014 (the Market Abuse Regulation).

Furthermore, investors could potentially bring contract claims against the IPO issuer under the generally applicable private contract law rules on sale. All of those possible legal actions can only consist of a compensation claim to redress the losses suffered by the claimant.

Law stated - 16 May 2022

UPDATE AND TRENDS

Key developments

Are there any other current developments or emerging trends that should be noted?

The enactment of Decision 2/892/13.10.2020 and the subsequent lifting of previously applicable restrictions on the

duration of the Greek public offer, the minimum allocation of shares to retail and institutional investors and the conduct of the book-building process has led to the simplification of the overall process and further enhanced the efficiency of the Hellenic Capital Market Commission procedure for the approval of the prospectus.

Moreover, the provisions of Law 4706/2020 on corporate governance, which came into full force in July 2021, impose stricter rules on listed companies, especially with respect to the independence criteria for the relevant members of the board of directors and the scope and operation of internal audit. IPOs have been further facilitated by the full operation of the omnibus accounts in the Athens Exchange central securities depository (the ATHEXCSD) following its licensing under Regulation 909/2014. This further enables foreign investors holding their assets in global custody accounts to participate in investment in listed securities in Greece.

It is also noteworthy that the ATHEX environmental, social and governance (ESG) index was created in July 2021, and ATHEX revised its ESG Reporting Guide in March 2022 to adapt metrics to international standards and provide additional information on relevant ESG reporting guidelines and regulations. These developments were designed to facilitate and promote ESG compliance of currently listed companies, but may also increase the attractiveness of ATHEX for IPOs in the long run.

Law stated - 16 May 2022

Jurisdictions

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	Denmark	Mazanti-Andersen
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	Hong Kong	Simpson Thacher & Bartlett LLP
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