EUROBANK S.A.

PILLAR 3 REPORT

FOR THE YEAR ENDED
31 DECEMBER 2021

8 Othonos Street, Athens 105 57, Greece
www.eurobankholdings.gr, Tel.: (+30) 214 40 61000
General Commercial Registry No: 000223001000

Index of tables

1. Introduction – General Information

Eurobank S.A. (hereafter the Bank), which resulted from the demerger of Eurobank Ergasias S.A. ("Demerged entity") through its banking sector's hive down, is a wholly owned subsidiary of Eurobank Ergasias Services and Holdings S.A. (the "Parent Company"). In particular, on 20 March 2020, the demerger of Eurobank Ergasias S.A. through the banking sector's hive down and the establishment of a new credit institution ("Demerger") under the corporate name "Eurobank S.A." ("the Beneficiary") was completed. At the aforementioned date: a) the Demerged Entity became the shareholder of the Beneficiary by acquiring all the shares issued by the Beneficiary and b) the Beneficiary substituted the Demerged Entity, by way of universal succession, to all the transferred assets and liabilities. Following the above, the corporate name of the Demerged Entity was amended to "Eurobank Ergasias Services and Holdings S.A." (the Company or Eurobank Holdings). As a result of the hive down, Eurobank S.A. and the subsidiaries contributed by Eurobank Ergasias, form a new reporting entity Eurobank S.A. Group.

The Bank is active in retail, corporate and private banking, asset management, treasury, capital markets and other services. The Bank is incorporated in Greece and operates mainly in Greece and through its subsidiaries in Central and Southeastern Europe.

Following the above "Eurobank Ergasias Services and Holdings S.A." is supervised on a consolidated basis and "Eurobank S.A." is supervised on a standalone basis by European Central Bank (ECB) and Bank of Greece (BoG).

1.1 Highlights

Risk profile

	31 December 2021 (1) & (2) € million	31 December 2021 (1) € million	31 December 2021 € million	31 December 2020 (1) & (3) € million
Common Equity Tier 1 (CET1) capital	4,426	4,096	3,580	4,245
Tier 1 capital	4,426	4,096	3,580	4,245
Total capital	5,376	5,046	4,530	5,195
Total risk-weighted exposure amount	33,037	32,983	32,865	34,185
Common Equity Tier 1 ratio (%)	13.4%	12.4%	10.9%	12.4%
Tier 1 ratio (%)	13.4%	12.4%	10.9%	12.4%
Total capital ratio (%)	16.3%	15.3%	13.8%	15.2%
Leverage ratio	7.5%	7.5%	6.5%	7.9%
Liquidity coverage ratio (%)	160.1%	160.1%	160.1%	123.4%
NSFR ratio (%)	111.6%	111.6%	111.6%	

(1) *Including profits € 469 million for year ended 31 December 2021 and €15 million for year ended 31 December 2020.*

(2) *Pro-forma with the completion of the sale of Eurobank's merchant acquiring business (project "Triangle").*

(3) *The table above for the year ended 31 December 2020 has not been restated following the retrospective application of IFRIC agenda decision - Attributing Benefit to Periods of Service (IAS 19).*

1.2 NPE Management Strategy and Operational targets

The Group utilized all Greek State measures (Gefyra programs) and designed solutions that will lead its clients gradually to pre Covid-19 payment schedules. In this respect and in line with the regulatory framework and Single Supervisory Mechanism (SSM) requirements for the non performing exposures (NPE) management, in March 2022 the Group submitted its NPE Management Strategy for 2022-2024, along with the annual NPE stock targets at both Bank and Group level. The plan had taken into account the successfully implemented, by the end of 2021, "Mexico" NPE securitization of gross carrying amount of ca. € 3.1 billion (consisting primary of NPEs) and envisages the decrease of NPE ratio at 5.8% in 2022 and below 5% in 2024.

1.3 Project "Mexico" – loans' derecognition

In line with the regulatory framework and SSM requirements for the non-performing loans (NPE) management, the Bank contemplated another significant NPE securitization transaction (project "Mexico") in order to decrease further its NPE ratio and strengthen its balance sheet de-risking. The project "Mexico" represents the continuation of the NPE reduction plan that was successfully completed in 2020, where NPE are transferred to Eurobank Holdings (parent company), the group company responsible for the overall management and supervision of the Group's NPE. The project "Mexico" was included under the Hellenic Asset Protection Scheme (HAPS) thus became entitled to the Greek State's guarantee which was subject to the accounting derecognition of the underlying loan portfolio from the Group's balance sheet.

In particular, in May 2021, the Bank, through its special purpose financing vehicle "Mexico Finance Designated Activity Company" (SPV), issued senior (Class A), mezzanine (Class B) and junior (Class C) notes of total nominal amount of ca. € 5.2 billion, via a securitization of a mixed portfolio comprising primarily NPE of total principle amount due of ca. € 5.2 billion and gross carrying amount of ca. € 3.2 billion, which were fully retained by the Bank. The control of the SPV resides with the majority holder of the Class B notes. Accordingly, the Group, being the sole holder of the issued notes, controlled the SPV and the related real estate company "Mexico Estate Single Member S.A.", and continued recognizing the underlying loan portfolio on its balance sheet on the basis that it retained substantially all risks and rewards of the portfolio's ownership.

On 1 June 2021, the General Shareholders' Meeting of the Bank (GM), following the relevant decision of its Board of Directors (BoD), approved the distribution of the 95% of the mezzanine and junior notes of Mexico securitization to its parent company through the decrease in kind of the Bank's share capital. The aforementioned GM's approval for the Bank's share capital reduction and the relevant amendment of its articles of association were subject to the regulator's approval.

In August 2021, the Bank was granted the required regulatory approval by the ECB and the relevant amendments of its articles of association were subsequently approved by the Ministry of Developments and Investments and registered to the General Electronic Commercial Registry (G.E.MI.).

The settlement of the distribution in kind of the Bank to its parent company, that took place in September 2021, resulted in the de-recognition of the underlying loan portfolio and the related assets and liabilities from the Bank's balance sheet, on the basis that the latter transferred substantially all risks and rewards of the portfolio's ownership and relinquished its control over it.

In August 2021, a commitment letter was signed between Eurobank Holdings, Eurobank and doValue S.p.A. for the sale of 95% of mezzanine and junior notes of Mexico securitization that were distributed to Eurobank Holdings, subject to the fulfilment of certain conditions, including the settlement of the mezzanine and junior notes' distribution from the Bank to Eurobank Holdings that was completed in September 2021, as well as the issuance of the Ministerial Decision on the inclusion of the Mexico securitization under HAPS and the regulatory approval by the SSM for the significant risk transfer of the underlying loan portfolio that were received in December 2021. After the fulfillment of all conditions and having received all appropriate approvals, the aforementioned sale transaction was concluded in December 2021.

Further information is provided in the Financial Statements note 20.

1.4 Synthetic Securitization transactions (Wave I & II)

In December 2021, the Bank, proceeded with the execution of two synthetic risk transfer transactions (projects "Wave I" and "Wave II"), in the form of a financial guarantee, of a portfolio of performing SMEs and large corporate loans of € 1.7 billion (reference portfolio). The "Wave I" transaction was entered with Magnetar Capital, guaranteeing the mezzanine loss of a pool of performing SMEs and large corporate loans of € 1.0 billion, whereas the Wave II transaction was entered with European Investment Fund, guaranteeing the first loss of a pool of performing SMEs and large corporate loans of € 0.7 billion. Both transactions were accounted for as purchased financial guarantee contracts that are not integral to the contractual terms of the reference portfolio, where a compensation right resulting from the expected credit losses of the protected loans is recognized, to the extent that it is virtually certain that the Bank will be reimbursed for the credit losses incurred. The reference portfolio continued to be recognised on the Bank's Balance Sheet.

1.5 Eurobank Merchant Acquiring business classified as held for sale - Project "Triangle"

As announced by Eurobank Holdings on 7 December 2021, the Bank has signed a binding agreement with Worldline B.V. ("Worldline") that includes a) the sale of 80% of Eurobank's merchant acquiring business ("PayCo") to Worldline with the Bank maintaining the remaining 20% and b) a long-term agreement for the exclusive distribution of PayCo products in Greece through the Bank's sales network.

The agreement values 100% of PayCo at € 320 million, subject to customary adjustments as of the date of completion of the Transaction. The transaction also entails an additional conditional payment, referral fees from PayCo and customary minority protection rights.

As 31 December 2021, on the basis of the binding agreement signed between the Bank and Worldline, Eurobank Merchant Acquiring business, has been classified as held for sale.

The Transaction is expected to be completed by the second quarter of 2022, subject to obtaining the relevant regulatory approvals and to contribute ca. 80 bps to Eurobank's Group Common Equity Tier 1 (CET1) ratio.

1.6 Hellenic Bank

On 23 July 2021, Eurobank S.A. announced the acquisition of a 9.9% holding in Hellenic Bank Public Company Limited ("Hellenic Bank") and the entering into a share purchase agreement with Third Point Hellenic Recovery Fund L.P. for the acquisition of an additional 2.7%, which was completed on 28 December 2021 following the receipt of the relevant regulatory approvals.

Hellenic Bank is one of the largest financial institutions in Cyprus, active in personal, business and international banking. The above investment is aligned with the overall strategy of the Group to further strengthen its presence in all key markets in which retains a strategic interest and thus has been designated at FVOCI.

1.7 Tier 2 Capital instruments

In January 2018, Eurobank Ergasias S.A issued Tier 2 capital instruments of face value of € 950 million, in replacement of the preference shares which had been issued in the context of the first stream of Hellenic Republic's plan to support liquidity in the Greek economy under Law 3723/2008. The aforementioned instruments have a maturity of ten years (until 17 January 2028) and pay fixed nominal interest rate of 6.41% that shall be payable semi-annually. As 31 December 2021, the carrying amount of the subordinated instrument issued amounted to € 950 million.

Further information is provided in the Financial Statements note 33.

1.8 Regulatory framework

The general Basel III framework is structured around three mutually reinforcing pillars:

- Pillar 1 defines the minimum regulatory capital requirements, based on principles, rules and methods specifying and measuring credit, market and operational risk. These requirements are covered by regulatory own funds, according to the rules and specifications of CRR.
- Pillar 2 addresses the internal processes for assessing overall capital and liquid asset holdings are adequate in relation to risks profile (Internal Capital Adequacy Assessment Process - ICAAP and Internal Liquidity Assessment Process -

ILAAP). Moreover, Pillar 2 introduces the Supervisory Review & Evaluation Process (SREP), which assesses the risks banks face and check that banks are equipped to manage those risks properly.

- Pillar 3 intends to enhance market discipline by developing a set of quantitative and qualitative disclosure requirements, which allow market participants to assess key pieces of information on the scope of application, capital, risk exposures, risk assessment processes and hence the capital adequacy and the internal liquidity adequacy of credit institutions.

According to the CRD IV provisions (with gradual implementation until 2019):

- Minimum CET1 ratio: 4.5%;
- Minimum Tier 1 ratio: 6%;
- Minimum Total Capital ratio: 8%;

Furthermore, banks are required to maintain in addition to the above minimum ratios, a capital conservation buffer equal to 2.5 % (from 1 January 2019) of their total risk exposure amount calculated.

As a result, the minimum ratios which must be met, including the capital conservation buffer and which shall apply from 1 January 2019 are:

- Minimum CET1 capital ratio 7%; and
- Total capital adequacy ratio 10.5%.

Additional capital buffers that CRD IV introduces are the following:

a) Countercyclical buffer (CCyB). The purpose of this buffer is to counteract the effects of the economic cycle on banks' lending activity, thus making the supply of credit less volatile and possibly even reduce the probability of credit bubbles or crunches. Credit institutions are required under the CRD IV to build up an additional buffer of 0% - 2.5% of CET1 during periods of excess credit growth, according to national circumstances. According to relevant BoG Executive Committee Act No 196/9.12.2021, the countercyclical buffer is set at 0% for the first quarter of 2022.

b) Global systemic institution buffer (G-SIIs). CRD IV includes a mandatory systemic risk buffer of CET1 for banks that are identified by the relevant authority as globally systemically important, which is not applicable to Greek banks.

c) Other systemically important institutions buffer (O-SIIs). On 3 April 2020, European Banking Authority (EBA) published the updated list of O-SIIs in the EU. O-SIIs are those institutions which are deemed systematically relevant in addition to G-SIIs, already identified. This list also reflects the additional capital buffers that the relevant authorities have set for the O-SIIs. The list of O-SIIs is disclosed on an annual basis, along with any CET1 capital buffer requirements which may need to be set or reset. In case of higher capital requirements, these become applicable at least one year after the publication of the O-SIIs list, to give institutions enough time to adjust to the new buffer requirements.
According to BoG Executive Committee Act No 195/29.11.2021, the O-SII buffer will apply also at solo level for first time as until last year it was applicable only at Group level. The O-SII buffer for Greek institutions is set at 0.75% for the year 2022.

d) Systemic Risk Buffer (SyRB). According to article 133 of CRD, SyRB can be used to address a broad range of systemic risks, which may also stem from exposures to specific sectors, as long as they are not already covered by the Capital Requirements Regulation or by the CCyB or the G-SII/O-SII buffers. The level of the SyRB may vary across institutions or sets of institutions as well as across subsets of exposures. There is no maximum limit for this buffer. Competent authority is in charge of setting the systemic risk buffer and of identifying the sets of institutions to which it applies. According to BoG Executive Committee Act No 197/21.12.2021, BoG decided to adopt the EBA guidelines on the appropriate subsets of exposures to which the competent authority or the designated authority may apply a systemic risk buffer based on paragraph 5 of article 133 of CRD.

1.8.1 Regulatory Developments

On 29 May 2020, EBA published its Guidelines on loan origination and monitoring that expect Banks to develop robust and prudent standards to ensure newly originated loans are assessed properly. The Guidelines set requirements for assessing the borrowers' creditworthiness together with the handling of information and data for the purposes of such assessments. In these requirements, the Guidelines bring together the EBA's prudential and consumer protection objectives. The application of the Guidelines for newly originated loans needs to be in place within Q2 2021, while gradually and until Q2 2024 the application of the Guidelines needs to be expanded to existing loans that have been renegotiated and to the stock of existing loans.

On 17 December 2020, the European Commission published Regulation 2021/451, which lays down uniform reporting formats and templates, instructions, frequency and dates of reporting. This Regulation is applicable from 28 June 2021 except from the reporting on leverage ratio buffer requirement for G-SIIs and own funds / own funds requirements for investment firms which shall apply from 1 January 2023 and 26 June 2026 respectively.

In May 2021, Law 4261/2014 was amended by Law 4799/2021, which introduced Directive 2019/878 (CRD V) into Greek law. The key changes introduced by Law 4799/2021 include:

- the obligation for financial holding companies to seek approval by the consolidating supervisory authority in order to be brought under the direct scope of supervisory powers pursuant to CRD IV and CRR and ensure compliance with consolidated prudential requirements;
- the requirement for banks to meet at least three quarters of the P2R with Tier 1 capital and at least 75% of this Tier 1 capital to be made up of CET1 capital;
- the increase of the upper limit for the O-SII buffer to 3% (from 2% under the previous regime).

On 26 May 2021, EBA published final draft RTS on own funds and eligible liabilities. Since their entry into force, the RTS on own funds have significantly enhanced regulatory harmonisation of prudential rules and contributed to strengthening the quality of regulatory capital. The draft RTS align existing provisions to changes introduced in the revised CRR in the area of own funds. This is the case, in particular for provisions relating to the regime of supervisory prior permission for the reduction of own funds. In addition, the draft RTS specify some of the newly introduced criteria for eligible liabilities instruments derived from the own funds' regime. These include the absence of direct or indirect funding for the acquisition of ownership of eligible liabilities, the absence of incentives to redeem, the need for the resolution authority's prior permission for the reduction of eligible liabilities.

On 21 June 2021, EBA published its updated Report on the monitoring of AT1 instruments including an update on the monitoring of the implementation of the EBA's Opinion on legacy instruments and its considerations on ESG capital bonds. The objective of this update is to further strengthen the robustness and quality of EU institutions' own funds and eligible liabilities instruments. In addition, the EBA has identified differences in the clauses of the environmental, social and governance (ESG) issuances made for capital/loss absorbency purposes. In this regard, the EBA is providing best practices or practices that should be avoided for these issuances. The purpose is to give views and recommendations on how ESG capital bonds features are meant to interact with the eligibility criteria for own funds and eligible liabilities instruments, and ultimately to safeguard the quality of the instruments from a prudential perspective.

On 15 September 2021, EBA published the Final Guidelines specifying the criteria to assess the exceptional cases when institutions exceed the large exposure limits of Article 395(1) of Regulation (EU) No 575/2013 (CRR) and the time and measures to return to compliance pursuant to Article 396(3) of CRR. The guidelines contain the criteria to determine the exceptional cases referred to in Article 396(1) of CRR, information to be provided to the competent authority in case of a breach of the Large Exposure limits, criteria to determine the appropriate time to return to compliance and measures to be taken to ensure the timely return according to Article 395(1).

On 22 September 2021, ECB published the results of its economy-wide climate stress test. The exercise tested the impact of climate change on more than four million firms worldwide and 1,600 euro area banks under three different climate policy scenarios. The results show that firms and banks clearly benefit from adopting green policies early on to foster the transition to a zero-carbon economy. The exercise also reveals that the impact of climate risk is concentrated in certain regions and sectors of the euro area. In particular, firms located in regions most exposed to physical risk could face very severe and frequent natural disasters, which would in turn affect their creditworthiness. The final climate stress test results are in line with the preliminary results published in March 2021 and complement these findings by including assessments of banks' resilience to climate risks through loans, security and equity holdings.

On 22 October 2021, the three European Supervisory Authorities (EBA, EIOPA and ESMA – ESAs) delivered to the European Commission (EC) their Final Report with draft RTS regarding disclosures under the Sustainable Finance Disclosure Regulation (SFDR) as amended by the Regulation on the establishment of a framework to facilitate sustainable investment (Taxonomy Regulation). The disclosures relate to financial products that make sustainable investments contributing to environmental objectives. The draft RTS aim to:

- provide disclosures to end investors regarding the investments of financial products in environmentally sustainable economic activities, providing them with comparable information to make informed investment choices; and
- establish a single rulebook for sustainability disclosures under the SFDR and the Taxonomy Regulation.

The Bank will monitor developments on the aforementioned proposals until their expected adoption by the European Parliament and the Council of the EU.

On 24 January 2022, EBA published its final draft Implementing Technical Standards (ITS) on Pillar 3 disclosures on ESG risks. The final draft ITS put forward disclosures to show how climate change may exacerbate other risks within institutions' balance sheets, how institutions are mitigating those risks, and their ratios, including the Green Asset Ratio (GAR), on exposures financing taxonomy-aligned activities. Disclosure of information on ESG risks is a vital tool to promote market discipline, allowing stakeholders to assess banks' ESG related risks and sustainable finance strategy. In line with the requirements laid down in CRR, the draft ITS set out comparable quantitative disclosures on climate-change related transition and physical risks, including information on exposures towards carbon related assets and assets subject to chronic and acute climate change events. They also include quantitative disclosures on institutions' mitigating actions supporting their counterparties in the transition to a carbon neutral economy and in the adaptation to climate change. In addition, they include KPIs on institutions' assets financing activities that are environmentally sustainable according to the EU taxonomy (GAR and Banking Book Taxonomy Alignment Ratio (BTAR)).

1.8.2 Covid-19 regulatory measures

The Covid-19 pandemic constitutes an unprecedented challenge with very severe socio-economic consequences. Regulatory authorities have responded to this challenge with a number of regulatory measures.

On 12 March 2020, the ECB announced a number of measures to ensure that its directly supervised banks can continue to fulfil their role in funding the real economy.

The ECB's relief measures covered the following areas: a) asset quality deterioration and non- performing loans, b) operational aspects of supervision and c) capital and liquidity requirements. Specifically, banks will be allowed, among others, to operate temporarily below the level of capital defined by the Pillar 2 Guidance (P2G) and the Capital Conservation Buffer (CCB). Banks are also allowed to partially use capital instruments that do not qualify as CET1 capital, for example Additional Tier 1 (AT1) or Tier 2 instruments, to meet the Pillar 2 Requirements (P2R).

Following the ECB recommendation of 27 March of 2020 (2020/19) on dividend distribution, the ECB recommends that at least until 1 October 2020 no dividends are paid out and no irrevocable commitment to pay out dividends is undertaken by the credit institutions for the financial year 2019 and 2020 and that credit institutions refrain from share buy-backs aimed at remunerating shareholders.

On 17 September 2020, ECB announced that euro area banks may exclude certain central bank exposures from the denominators of their leverage ratios owing to the exceptional macroeconomic circumstances.

Introduction – General Information

On 15 December 2020, ECB extended its recommendation to banks on dividend distributions and share buy-backs until 30 September 2021, meaning the next decisions to pay dividends should take place in the fourth quarter of 2021. ECB asked banks to be extremely moderate with regard to variable remuneration.

On 18 June 2021, the ECB announced that euro area banks under its direct supervision may continue to exclude certain central bank exposures from the leverage ratio as exceptional macroeconomic circumstances due to the Covid-19 pandemic continue. This extends until March 2022 the leverage ratio relief granted in September 2020, which was set to expire on 27 June 2021.

On 23 July 2021, ECB decided not to extend beyond September 2021 its recommendation that all banks limit dividends. Instead, supervisors will assess the capital and distribution plans of each bank as part of the regular supervisory process.

On 10 February 2022, ECB announced the end of the last temporary relief measures still available to banks, hence confirming the return to normality under the initially envisaged timeline. More specifically, ECB decided that banks are expected to operate the Pillar 2 Guidance from January 2023, while it will not extend beyond March 2022 the supervisory measure that allows banks to exclude central bank exposures from their leverage ratios.

On 2 April 2020, the EBA published “Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis before 30 June 2020”. On 25 June 2020, EBA introduced a new deadline of 30 September 2020 replacing the previous date of 30 June 2020. The aim of these Guidelines was to clarify the requirements for public and private moratoria, which if fulfilled, will help avoid the classification of exposures under the definition of forbearance or as defaulted under distressed restructuring.

On 2 December 2020, EBA has decided to reactivate its Guidelines on Legislative and non-legislative moratoria due to the exceptional circumstances of the second Covid-19 wave. This reactivation will ensure that loans, which had previously not benefitted from payment moratoria, can now also benefit from them. The role of banks to ensure the continued flow of lending to clients remains of utmost importance. These Guidelines, which will apply until 31 March 2021, include additional safeguards against the risk of an undue increase in unrecognised losses on banks’ balance sheet.

On 17 January 2022, EBA confirmed the need to continue monitoring exposures and the credit quality of loans benefitting from various public support measures due to the uncertainty over Covid-19 developments. To facilitate such monitoring by the competent authorities, especially in the jurisdictions where loans under moratoria and public guarantee schemes remain a concern, the EBA confirms that the Guidelines on the reporting and disclosure of exposures subject to measures applied in response to the Covid-19 crisis adopted on 2 June 2020 continue to apply until further notice

On 9 June 2020, the Economic and Monetary Affairs Committee MEPs agreed to apply specific changes to the capital requirements regulation (CRR), which will have to be coherently applied in the EU. Banks will have to monitor the effects of the pandemic on their balance sheets, pay close attention to non-performing loans and apply know-your-customer standards. The material changes include:

- Extension by two years of the transitional arrangements for IFRS 9 (international accounting standard) and further relief measures (capital add back);
- Alignment of minimum coverage requirements for non-performing loans guaranteed by the public sector with those guaranteed by official export credit agencies;
- Deferred application of the leverage ratio buffer by one year to January 2023;
- Advanced application of a more favourable prudential treatment of loans to pensioners or employees with a permanent contract that are backed by the borrower's pension or salary;
- Advanced application of both, the SME and infrastructure supporting factors, which allows for a more favourable prudential treatment of certain exposures to SMEs and infrastructure;

- Temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in relation to exposures to central of governments, to regional governments, to local authorities and public sector entities;
- Banks will no longer be required to fully deduct software assets from their capital.

The plenary session vote on the CRR 'quick fix' took place on 19 June 2020.

On June 24, 2020, the EU Council announced that it had adopted Regulation (EU) 2020/873 (CRR 'quick fix') amending Regulations (EU) No 575/2013, as amended ("CRR") and (EU) 2019/876 ("CRR2"). The CRR 'quick fix' legislation intends to help credit institutions to mitigate impact of the Covid-19 outbreak and to provide incentives for banks to continue lending to business and consumers.

On 14 October 2020, the EBA published its final draft regulatory technical standards (RTS) specifying the prudential treatment of software assets according to Art. 36(4) of the Capital Requirements Regulation (CRR), based on a prudential amortisation of software assets. EBA has concluded that the prudential amortization approach would best fit its purpose and objectives. This method implies that the positive difference between prudential and accounting accumulated depreciation shall be fully deducted from CET1, while the residual portion of the carrying amount shall be risk-weighted. If the useful life of software estimated for accounting purposes is shorter than the prudential amortization period, the former shall be used also for prudential purposes. Additionally, the prudential amortization period has been set at maximum 3 years, starting from the date on which the software asset is available for use. The prudential amortizations and deductions shall be made separately for each software asset. All the investments made for maintaining, enhancing or upgrading the existing software assets shall be treated as separate assets, considering that those investments are recognized as an intangible asset on the balance sheet. In line with the recent CRR 'quick fix', the date of entry into force of the RTS has been moved forward to the day following its publication in the Official Journal of the EU, i.e. 23 December 2020.

On 6 April 2021, the EU adopted earlier two regulations to amend the securitisation framework (the review planned for 2022). The Regulation (EU) 2021/557 amending the Securitisation Regulation (2017/2402) provides a general framework for securitisation and creates a specific framework for simple, transparent and standardized securitisations. The Regulation (EU) 2021/558 makes changes to the CRR with respect to certain adjustments to securitisation framework. Both regulations came into force on 9 April 2021.

Furthermore the Basel Committee's oversight body, the Group of Central Bank Governors and Heads of Supervision (GHOS), has endorsed a set of measures to provide additional operational capacity for banks and supervisors to respond to the immediate financial stability priorities resulting from the impact of the coronavirus disease (COVID-19) on the global banking system:

- The implementation date of the Basel III standards finalised in December 2017 has been deferred by one year to 1 January 2023. The accompanying transitional arrangements for the output floor have also been extended by one year to 1 January 2028.
- The implementation date of the revised market risk framework finalised in January 2019 has been deferred by one year to 1 January 2023.
- The implementation date of the revised Pillar 3 disclosure requirements finalised in December 2018 has been deferred by one year to 1 January 2023.

1.9 Single Supervisory Mechanism (SSM)

Pursuant to the proposal of the EU Commission dated 12 September 2012 as regards a Single Supervisory Mechanism (SSM), Council Regulation No 1024/2013 of 15 October 2013 was issued, which conferred specific tasks on the ECB concerning policies relating to the prudential supervision of credit institutions. Furthermore, Regulation No 1022/2013 of the European Parliament and of the Council of 22 October 2013 was also issued, amending Regulation No 1093/2010 establishing the EBA as regards the conferral of specific tasks on the ECB pursuant to Council Regulation No 1024/2013.

The SSM refers to the system of banking supervision in Europe. It comprises the ECB and the national supervisory authorities of the participating members. The main aims of the SSM are to ensure the safety and soundness of the European banking system, increase financial integration and stability and ensure consistent supervision.

As of November 2014, the ECB directly supervises the largest banks, while the national supervisors continue to monitor the remaining banks. The main task of the ECB and the national supervisors, working closely together within an integrated system, is to check that banks comply with the EU banking rules and tackle problems early on.

The SSM is one of the two pillars of the EU banking union, along with the Single Resolution Mechanism.

Single Rulebook

The Single Rulebook is the foundation of the banking union. The term Single Rulebook was coined in 2009 by the European Council in order to provide a single set of harmonised prudential rules which institutions throughout the EU must comply with. These rules, among other things, lay down capital requirements for banks, ensure better protection for depositors and regulate the prevention and management of bank failures.

Supervisory Review and Evaluation Process (SREP)

Based on Council Regulation 1024/2013, the ECB conducts annually a SREP, in order to define the prudential requirements of the institutions under its supervision, by defining a total SREP capital requirement.
The key purpose of SREP is to ensure that institutions have adequate arrangements, strategies, processes and mechanisms as well as capital and liquidity to ensure a sound management and coverage of their risks, to which they are or might be exposed, including those revealed by stress testing and risks the institution may pose to the financial system.
The common SREP framework introduced is built around:

- business model analysis.
- assessment of internal governance and institution-wide control arrangements.
- assessment of risks to capital and adequacy of capital to cover these risks; and
- assessment of risks to liquidity and adequacy of liquidity resources to cover these risks.

The minimum capital adequacy requirements are determined by the ECB following the assessment of the institution’s risk profile (through SREP). The SREP requirements consist of:

- The minimum required CET1 ratio and the minimum required Total capital adequacy ratio (Total SREP Capital Requirement or TSCR) that the Bank must meet at all times;
- The Overall Capital Requirement (OCR), which include, in addition to the TSCR, the combined buffer requirement, and which in case of breach, leads to the trigger of the Maximum Distributable Amount (MDA) restrictions; and
- The Pillar 2 Guidance (P2G), which is an additional capital buffer recommended by the ECB to be kept over and above the OCR.

Pillar 2 Requirement (P2R)

The Pillar 2 Requirement (P2R) is a capital requirement which applies in addition to and covers risks which are underestimated or not covered by the minimum capital requirements (Pillar 1). The P2R is binding and its breach can have direct legal consequences for an institution. The P2R is determined via the SREP.

Based on the completion of the SREP decision for the year 2021, the ECB notified that the Bank shall meet, on an individual basis, a total SREP capital requirement (TSCR) of 11%, which includes a Pillar 2 Requirement (P2R) of 3%. This requirement must be maintained at all times in accordance with Article 16(2)(a) of Regulation (EU) No 1024/2013.

Part of the P2R must be held in the form of CET1 capital (1.69%), while Additional Tier 1 and Tier 2 capital, where available, may be used to cover the remaining part.

1.10 Stress Test

On 30 July 2021, Eurobank Holdings announced that Eurobank Holdings Group successfully completed the 2021 SSM Stress Test (ST), which was coordinated and conducted by the ECB.
Information about the results of the 2021 EU-wide stress test is included in the consolidated Pillar III of Eurobank Holdings for the year ended 31 December 2021.

1.11 Climate Risk Stress Test

On 27 January 2022, the ECB launched a supervisory climate risk stress test to assess how prepared banks are for dealing with financial and economic shocks stemming from climate risk. General information about the climate risk stress test is included in the consolidated financial statements of Eurobank Holdings for the year ended 31 December 2021.

1.12 Recovery and Resolution of Credit Institutions

On 15 May 2014 the European Parliament and the Council of the European Union adopted the Directive 2014/59 EU establishing a framework for the recovery and resolution of credit institutions and investment firms (the Bank Recovery and Resolution Directive (BRRD)) which entered into force on 2 July 2014. The European Council has recognised that in the Banking Union, banking supervision and resolution need to be exercised uniformly, thus making obvious the need for the establishment of the Single Resolution Mechanism (SRM) and a Single Resolution Fund, (SRF) and in this context, the European Parliament and Council adopted Regulation No 806/2014 (the “SRM Regulation”).

The BRRD, which was transposed into Greek law by virtue of Law 4335/2015, relies on a network of national authorities and resolution funds to resolve banks. Pursuant to Law 4335/2015, with respect to Greek credit institutions, the BoG has been designated as the national resolution authority and the Resolution Branch of the Hellenic Deposit and Investment Guarantee Fund (HDIGF) as the national resolution fund.

The SRM Regulation builds on the rulebook on banking resolution set out in the BRRD and establishes the SRM, which complements the SSM and centralizes key competences and resources for managing the failure of any bank in the Euro zone and in other Member States participating in the Banking Union. The SRM Regulation also established the Single Resolution Board (SRB), vested with centralised power for the application of the uniform resolution rules and procedures and the SRF, supporting the SRM. The main objective of the SRM is to ensure that potential future bank failures in the Banking Union are managed efficiently, with minimal costs to taxpayers and the real economy. The SRB is fully operational since January 2016.

In June 2019 the following legislative acts amending BRRD and SRMR were published in the Official Journal of the European Union:

- **Directive (EU) 2019/879** of the European Parliament and of the Council amending Directive 2014/59/EU on loss-absorbing and recapitalisation capacity of credit institutions and investment firms (known as “BRRD2”), and

- **Regulation (EU) 2019/877** of the European Parliament and of the Council amending Regulation (EU) No 806/2014 as regards loss-absorbing and recapitalisation capacity for credit institutions and investment firms (known as "SRMR2").

The SRMR2 applies from 28 December 2020, while BRRD2 was transposed into Greek law in May 2021under Law 4799/2021.

The revised framework brought about changes, among others, in the arrangements relating to the determination and application of the Minimum Requirement for Own funds and Eligible Liabilities (MREL). In that context, the key changes pertain to:

- the allocation of banks into different categories with different requirements to apply to each of these categories;
- the introduction of a Pillar 1 MREL applicable to large and systemically important institutions;
- the establishment of the subordination requirement based on which credit institutions must cover part of the MREL with capital instruments and subordinated MREL-eligible liabilities;
- the introduction of the internal MREL for material subsidiaries of credit institutions;
- the establishment of specific criteria for the determination of the transitional period during which credit institutions must meet the MREL; and
- the introduction of specific measures that resolution authorities and/or supervisory authorities, where relevant, may take in response to the breach of the MREL.

1.12.1 Minimum Requirements for Eligible Own Funds and Eligible Liabilities (MREL)

Under the Directive 2014/59 (Bank Recovery and Resolution Directive or BRRD), as amended by Directive 2019/879 (BRRD 2), which was transposed into the Greek legislation pursuant to Law 4799/2021 amending Law 4335/2015, European banks are required to meet the minimum requirement for own funds and eligible liabilities (MREL). The SRB has determined Eurobank S.A. as the Group's resolution entity and a Single Point of Entry (SPE) strategy for resolution purposes. Based on the latest official SRB's decision, the fully calibrated MREL (final target) to be met by Eurobank S.A. on a consolidated basis until the end of 2025 is set at 26.87% of its total risk weighted assets (RWAs), including a fully loaded combined buffer requirement (CBR) of 3.56%. The interim binding MREL target to be met at 1 January 2022 was set at 17.82% of its total RWAs, including a CBR of 3.31%.

In the year ended 31 December 2021, in the context of its medium-term strategy to meet its MREL target, the Bank proceeded with two issuances of preferred senior debt with a nominal value of € 500 million each. As a result, on 31 December 2021, the Bank's MREL ratio at consolidated level stands at 18.47% (including profit for the year ended 31 December 2021), which is well above the aforementioned interim binding MREL target. The final MREL target is updated by the SRB on an annual basis.

1.13 Implementation of Capital Adequacy framework

1.13.1 Credit risk

Eurobank Group (the "Bank" or the "Group") first applied the Basel II framework under the Standardised approach in January 2007 and included the respective risk asset ratio figures in its published financial statements. Until that date the Group had been applying the Basel I rules.

In June 2008, the Group received the approval of BoG to use the Internal Ratings Based (IRB) approach to calculate the capital requirement for credit risk. Therefore, with effect from 1 January 2008 the Group applies:

- The Foundation IRB (F-IRB) approach to calculate risk weighted assets for the corporate loans' portfolio of the Bank in Greece;

- The Advanced IRB (A-IRB) for the majority of the retail loans' portfolio of the Bank, i.e. mortgages, small business lending, credit cards and revolving credits in consumer lending;
- From September 2009 the F-IRB approach was applied for the corporate loans' portfolio of Eurobank Leasing Single Member S.A. in Greece;
- From March 2010 the A-IRB approach was applied for the Bank's portfolio of personal and car loans.

In October 2021, following the demerger of Eurobank Leasing Single Member S.A., the Bank acquired the majority of Leasing portfolio, without any change in the approach followed for capital requirements calculations.

Following the Mexico derecognition, the implementation of IRB covers 87.7%of the Bank's lending portfolio excluding portfolio segments which are immaterial in terms of size and risk profile as well as, permanent exemptions. The Bank is in the process of reviewing the IRB roll out plan taking into account ECB guidelines and its business plan. The updated roll out plan will be subject to ECB approval.

From January 1, 2018, the equity exposures of the Group, according to article 155 of Regulation (EU) No 575/2013 (Risk weighted exposure amounts for equity exposures), are subject to the IRB treatment.

There is a permanent exemption from the IRB approach, up to a maximum of 10% of Risk Weighted Assets, for which the Standardised approach is applied. In addition to the exemption of up to a maximum of 10% of Risk Weighted Assets, permanent exemption has been granted for the following exposure classes as prescribed in the CRD:

- exposures to/or guaranteed by central governments and central banks;
- exposures to/or guaranteed by credit and financial institutions; and
- exposures to administrative bodies and non-commercial undertakings.

The Standardised approach is applied for these exposures.

1.13.2 Market risk

The Bank uses its own internal Value at Risk (VaR) model to calculate capital requirements for market risk in its trading book, for the Bank's activities in Greece. The Bank received the official validation of its model for market risk by the BoG in July 2005. The model is subject to periodic review by the regulator.

In 2011, the Bank updated its models and systems in order to fully comply with the BoG Governor's Act 2646/2011 for the trading book capital. The Bank calculates the capital for stressed VaR and IRC (incremental risk capital charge) since 31.12.2011.

For the measurement of market risk exposure and the calculation of capital requirements for the Bank's subsidiaries in Greece and in international operations, the Standardised Approach (SA) is applied.

Furthermore, the Bank calculates and monitors the market risk of the banking book for its operations in Greece and international subsidiaries on a daily basis using the internal VaR model. For its operations abroad, Eurobank additionally applies sensitivity analysis.

1.13.3 Operational risk

Capitalizing on the provisions of Regulation (EU) No 575/2013, the Bank applies the Standardised Approach to calculate the Pillar 1 regulatory capital requirements for operational risk for its operations.

1.14 Regulatory initiatives on Internal Models

SSM initiatives - Targeted Review of Internal Models

In line with Commission Delegated Regulation (EU) 2018/171 which supplements CRR with regard to regulatory technical standards for the materiality threshold for credit obligations past due and EBA Guidelines (EBA/GL/2016/07) which specify all aspects related to the application of the definition of default of an obligor, the Bank is applying since 1/1/2021 the new definition of default.

More specifically for the IRB portfolios, the Bank has also proceeded with the calibration of all IRB models under the new definition of default and applied them in the calculation of own funds requirements since June 2021 following relevant ECB approval.

The Bank has also introduced new PD models, approved by ECB within 2021, in the calculation of own funds requirements as follows:

1. Three new PD models for the corporate portfolio since June 2021;
2. Three models for the new production of Retail Lending since June 2021

Finally, in the context of the implementation of the new definition of default, the Bank has also proceeded with the calibration of all IFRS9 models under the new definition of default and applied them in the calculation of loan loss provisions since June 2021 for Retail models and since September 2021 for Corporate models.

1.15 Scope of Pillar 3

Pillar 3 report is prepared by the Bank on an individual basis, according to Article 13 of the CRR, as in force, in consideration of the fact that the Group prepares consolidated Pillar 3 report and "Eurobank S.A." is a significant subsidiary of the consolidating group entity.

The Bank includes in its Pillar 3 report, all the information which it deems necessary, to provide to users with a clear, complete and accurate view of the Bank. The purpose of Pillar 3 report is to provide updated information for the Bank's risk assessment processes and regulatory capital adequacy ratios.

Pillar 3 disclosures consist of both qualitative and quantitative information. They have been prepared according to the specific CRR Articles 437, 438, 440, 442, 450, 451, 451a and 453 of Part Eight of the Regulation (EU) No 575/2013, as in force. Consequently, it is subject to the limited disclosure requirement on annual basis. In December 2016 EBA published EBA/GL/2016/11 guidelines on revised Pillar 3 disclosures requirements to improve the consistency and comparability of institutions' regulatory disclosures. These guidelines harmonised the frequency of disclosures and updated the list of requirements to be considered for more frequent disclosures.

According to the above guidelines, when the disclosure is being reported for the first time, the data of the previous period is not required.

In December 2018, EBA published EBA/GL/2018/10 guidelines, which include enhanced disclosure formats for credit institutions for disclosures related to non-performing exposures, forborne exposures and foreclosed assets. Some templates are applicable to significant credit institutions that have a gross NPL ratio of 5% or above, as is the case for the Bank.

In June 2019, the European Parliament (EP) and the Council published the Regulation (EU) No 876/2019 or CRR 2 amending the CRR, regarding among others the reporting and disclosure framework. The CRR 2 rules follow a phased implementation with significant elements entering into force in 2021.

In response to the Covid-19 pandemic, EBA published EBA/GL/2020/07 guidelines, which introduce additional requirements in relation to the disclosure on exposures subject to the EBA Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis and on newly originated exposures subject to public guarantee schemes.

In addition to the CRR 'quick fix', EBA issued EBA/GL/2020/12 guidelines, which amend the EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 (CRR) as regards the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds, to provide clarity to institutions and users of information on the implementation of part of the disclosure requirements included in the CRR 'quick fix' and how institutions should disclose the information required.

In June 2020, EBA published new Implementing Technical Standards (ITS) on public disclosures by institutions and revised final draft ITS on supervisory reporting that implements changes introduced in the revised Capital Requirements Regulation (CRR2) and the Prudential Backstop Regulation. The two ITS aim to promote market discipline through enhanced and comparable public disclosures for stakeholders and to keep the reporting requirements in line with the evolving needs for Supervisory Authorities' risk assessments.

On 6 August 2021, EBA published an updated tool, which specifies the mapping between quantitative disclosure data points and the relevant supervisory reporting data points. This tool aims at facilitating institutions' compliance with disclosure requirements and improving the consistency and quality of the information disclosed.

Following new requirements, the Bank performed several changes to the tables disclosed in Pillar 3 Report and also adopted these changes in the previous periods, in order to provide comparative information.

1.16. Location, timing and frequency of disclosures

Pillar 3 disclosures are provided on an annual basis in electronic format, after taking into consideration the relevant recommendation of EBA Guidelines 2016/11.

Pillar 3 disclosures are provided with reference date (corresponding period) the close of the previous quarter and in conjunction with the date of publication of the financial statements. Equivalent disclosures made by the Bank under accounting, listing or other requirements are deemed to constitute compliance with the requirements of the aforementioned Regulation (EU) No 575/2013 (Part Eight) taking into consideration any existing relevant implementing Regulations as well as the EBA guidelines.

Pillar 3 disclosures are a standalone document that provides a readily accessible source of prudential information for users and is available on a designated location on the Bank's website (https://www.eurobank.gr/en/group/investor-relations/oikonomika-apotelesmata) in chronological order and cover both quantitative and qualitative information.

Quantitative information, which is included in the Bank's Financial Statements, is also provided at the above location. In this way, the Bank secures easy access of the market participants to continuous and complete information without cross-reference to other locations or media of communication. Regarding the timing of disclosures, CRR clarifies that disclosures shall be published on the same date as the date on which the institution publishes its financial reports or as soon as possible thereafter. The Bank's Pillar 3 disclosures will be published the latest either within one month from the publication of the financial statements or within the deadline of relevant Financial statements publication, as defined in Law 3556/2007.

The information contained in the Pillar 3 Disclosures has been verified by the Audit Committee and was approved by the Board of Directors on 29 April 2022.

Introduction – General Information

1.17 Compliance with Basel III Pillar 3 disclosures

According to CRR article 431, the Bank has issued an internal approved by the Board of Directors «Pillar 3 Disclosures Policy" in order to ensure consistent and continuous compliance with the Pillar 3 disclosures requirements, as these have been specified in the existing regulatory framework. Within this framework, the Bank operates as follows:

- Pillar 3 disclosures are provided on an individual basis;
- The Bank includes in its disclosures all information deemed necessary to provide users with a clear, complete and accurate view of the Bank's structure, capital management, risk management system and remuneration policy. During this procedure the Bank also identifies information that is material, confidential and proprietary;
- The Bank has opted to present the full set of Pillar 3 disclosures in a separate document "Pillar 3 Report", which is published annually on the Bank's website, in conjunction with the date of publication of its financial statements. The Remuneration disclosures are published as separate document;
- The Bank re-examines the extent and type of information provided at each disclosure date and revises its policy as necessary;
- The Audit Committee of the Bank is responsible to review and assess the process for the preparation of the Pillar 3 report, while the Board of Directors (BoD) of the Bank is responsible to approve it.

The aforementioned responsibilities are equivalent to those in respect of the Bank's Financial Statements.

Introduction – General Information

1.18 Regulatory Balance Sheet

There is no difference between regulatory and accounting Balance Sheet.

The table below shows the Bank's regulatory and accounting Balance Sheet as at 31 December 2021 and 31 December 2020.

Table 1: Regulatory and accounting Balance Sheet

Balance sheet per published financial statements and per regulatory consolidation	*Ref.*	**31 December 2021 € million**	31 December 2020 [1] € million
Assets			
Cash and Balances with central banks		8,373	3,736
Due from credit institutions		3,100	3,573
Securities held for trading		50	22
Derivative financial instruments		1,959	2,606
Loans and advances to customers		28,892	29,261
Investment securities		8,994	6,463
Shares in subsidiaries		1,922	1,919
Investments in associaties and joint ventures		102	104
Property, plant and equipment		587	549
Investment property		984	914
Intangible assets	*a*	172	173
Deferred tax asset		4,414	4,508
of which deferred tax assets that rely on future profitability excluding those arising from temporary differences	*b*	-	-
of which deferred tax credit		3,547	3,691
of which deferred tax assets arising from temporary differences	*c*	867	817
Other assets		1,990	1,765
Assets of disposal group classified as held for sale		65	36
Total assets		**61,604**	55,629
Liabilities			
Due to central banks		10,813	7,231
Due to credit institutions		2,896	4,138
Derivative financial instruments		2,414	2,937
Due to customers		37,221	34,448
Debt securities in issue		2,590	1,544
Other liabilities		1,186	1,151
Liabilities of disposal group classified as held for sale		37	-
Total liabilities		**57,157**	51,449
Equity			
Ordinary share capital		3,941	4,052
Share premium		-	-
Reserves and retained earnings		506	128
of which cash flow hedge reserves	*d*	(12)	(49)
Total equity	*e*	**4,447**	4,180
Total equity and liabilities		**61,604**	55,629

[1] The table above have not been restated for the year ended 31 December 2020 due to the retrospective application of IFRIC agenda decision - Attributing Benefit to Periods of Service (IAS 19).

2. Capital Management

The amount and quality of the capital held by the Bank is subject to certain rules and guidelines. The composition of the Bank's available regulatory capital under Pillar 1 is as follows:

2.1 Regulatory capital – definition

The Pillar 1 regulatory capital of the Bank is calculated on the basis of IFRS figures and according to the rules set by Regulation (EU) No 575/2013 as in force.

According to the CRR, the available regulatory capital is classified under two main categories: Tier 1 and Tier 2 capital. Tier 1 consists of CET1 and AT1 capital.

CET1 capital is composed of ordinary shareholders' equity, after the following adjustments:

Addition of:

- 50% of IFRS 9 impact of 2021 (refer to par. 2.2 and 2.5);
- 100% of IFRS 9 'quick fix' impact of 2021 increases in stage 1 and stage 2 provisions (refer to par. 2.2 and 2.5).

Deduction of:

- Fair value reserves related to gains or losses of cash flow hedges;
- Gains and losses on market valuation of liabilities designated as fair-value-through-profit-or-loss attributable to own credit risk;
- Goodwill and intangible assets adjusted based on the requirements of prudent valuation of software assets;
- Deferred tax assets that rely on future profitability excluding those arising from temporary differences (unused tax losses);
- Participating interests and subordinated loans (and other capital instruments qualifying as own funds) of more than 10% in not fully consolidated credit or other financial institutions, including insurance companies;
- Loan impairment allowances' shortage compared to IRB measurement of Expected Loss (EL);
- Deferred tax assets arising from temporary differences, which exceed 10% threshold of CET1 capital before certain deductions;
- The sum of deferred tax asset arising from temporary differences and participating interests and subordinated loans to financial institutions of more than 10% that are less than 10% of CET 1 capital and in total exceed the 17.65% threshold of adjusted CET1 capital; and
- Value adjustments due to the requirements for prudent valuation for all fair valued financial instruments and commodities (AVA).

Tier 1 capital comprises CET1 capital plus AT1 capital including preferred securities subject to phase out.

In case deductions of Tier 1 capital exceed positive amounts of Tier 1 capital, then the difference is deducted from CET1 capital.

Tier 2 capital is composed of the following items:

- Long term subordinated liabilities that meet certain regulatory specified criteria;
- General credit risk provisions up to 1.25% of risk weighted assets calculated under standardised approach;
- Positive difference between the sum of loan impairment allowances over the IRB measurement of Expected Losses, up to 0.6% of risk weighted assets calculated under the IRB approach.

In case deductions of Tier 2 capital exceed positive amounts of Tier 2 capital, then the difference is deducted from Tier 1 capital.

2.2 Transition rules

Regarding IFRS 9 adoption from 1.1.2018 and according to Regulation (EU) 2017/2395 of the European Parliament and the Council, a five year transition period is introduced, which allows banks to add back to their CET 1 capital 95% of IFRS 9 impact in 2018 and 85%, 70%, 50% and 25% in the subsequent four years.

According to the CRR 'quick fix' relief package, the IFRS 9 transitional arrangements have been extended by two years and a new calculation has been introduced where 100% relief is applied in 2020 and 2021 for increases in stage 1 and stage 2 provisions from 1 January 2020. Accordingly, the relief applied for 2022 is 75%, for 2023 50% and for 2024 25%.

The Bank has elected to apply the phase in approach for mitigating the impact of IFRS 9 transition on the regulatory capital.

In addition, the CRR 'quick fix' with the Article 468 introduces a temporary treatment that allows institutions to remove from the calculation of their CET1 items unrealised gains and losses measured at fair value through other comprehensive income during the period from 1 January 2020 to 31 of December 2022.

The Bank is not applying the temporary treatment specified in Article 468 therefore the own funds, capital and leverage ratios reflect the full impact of unrealised gains and losses measured at fair value through other comprehensive income.

Capital Management

2.3 Key Metrics

The table below provides an overview of the Banks prudential regulatory metrics.

Table 2: EU KM1 - Key Metrics template

		31 December 2021 (1) € million	31 December 2021 € million	31 December 2020 (1) & (4) € million	31 December 2020 (4) € million
	Available own funds (amounts)				
1	Common Equity Tier 1 (CET1) capital	**4,096**	3,580	4,245	4,229
2	Tier 1 capital	**4,096**	3,580	4,245	4,229
3	Total capital	**5,046**	4,530	5,195	5,179
	Risk-weighted exposure amounts				
4	Total risk-weighted exposure amount	**32,983**	32,865	34,185	34,181
	Capital ratios (as a percentage of risk-weighted exposure amount)				
5	Common Equity Tier 1 ratio (%)	**12.4%**	10.9%	12.4%	12.4%
6	Tier 1 ratio (%)	**12.4%**	10.9%	12.4%	12.4%
7	Total capital ratio (%)	**15.3%**	13.8%	15.2%	15.2%
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)				
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	**3.00%**	3.00%	3.00%	3.00%
EU 7b	of which: to be made up of CET1 capital (percentage points)	**1.69%**	1.69%	1.69%	1.69%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	**2.25%**	2.25%	2.25%	2.25%
EU 7d	Total SREP own funds requirements (%)	**11.00%**	11.00%	11.00%	11.00%
	Combined buffer requirement (as a percentage of risk-weighted exposure amount)				
8	Capital conservation buffer (%)	**2.50%**	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	**0.00%**	0.00%	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	**0.02%**	0.02%	0.01%	0.01%
EU 9a	Systemic risk buffer (%)	**0.00%**	0.00%	0.00%	0.00%
10	Global Systemically Important Institution buffer (%)	**0.00%**	0.00%	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer	**0.00%**	0.00%	0.50%	0.50%
11	Combined buffer requirement (%)	**2.52%**	2.52%	2.51%	2.51%
EU 11a	Overall capital requirements (%)	**13.52%**	13.52%	13.51%	13.51%
12	CET1 available after meeting the total SREP own funds requirements (%)	**4.17%**	2.64%		
	Leverage ratio				
13	Leverage ratio total exposure measure	**54,851**	54,804	53,590	53,589
14	Leverage ratio	**7.47%**	6.53%	7.92%	7.89%
	Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)				
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%		
EU 14b	of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%		
EU 14c	Total SREP leverage ratio requirements (%)	**3.10%**	3.10%		
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)				
EU 14d	Leverage ratio buffer requirement (%)	**0.00%**	0.00%		
EU 14e	Overall leverage ratio requirements (%)	**3.10%**	3.10%		
	Liquidity Coverage Ratio				
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	**8,904**	8,904	5,548	5,548
EU 16a	Cash outflows - Total weighted value	**5,949**	5,949	5,312	5,312
EU 16b	Cash inflows - Total weighted value	**384**	384	460	460
16	Total net cash outflows (adjusted value)	**5,565**	5,565	4,852	4,852
17	Liquidity coverage ratio (%) (adjusted value) (3)	**159.55%**	159.55%	114.13%	114.13%
	Liquidity coverage ratio (%)	**160.11%**	160.11%	123.36%	123.36%
	Net Stable Funding Ratio				
18	Total available stable funding	**46,971**	46,971		
19	Total required stable funding	**42,078**	42,078		
20	NSFR ratio (%)	**111.63%**	111.63%		

(1) *Including profits € 469 million for year ended 31 December 2021 and €15 million for year ended 31 December 2020.*

(2) *The pro-forma CET1 and Total Capital Adequacy ratios as at 31 December 2021 with the completion of the sale of Eurobank's merchant acquiring business would be 13.4% and 16.3%, respectively.*

(3) *Average figures based on previous monthly data points.*

(4) *The table above for the year ended 31 December 2020 has not been restated following the retrospective application of IFRIC agenda decision - Attributing Benefit to Periods of Service (IAS 19).*

2.4 Regulatory capital

The Bank has sought to maintain an actively managed capital base to cover risks inherent in the business. The adequacy of the Bank's capital is monitored using, among other measures, the rules and ratios established by the Basel Committee on Banking Supervision and adopted by the European Union and the SSM in supervising the Bank.

The table below shows the composition of the Bank's regulatory capital as at 31 December 2021 and at 31 December 2020 which is calculated according to CRD IV.

In addition, in Appendix 1 a transitional own fund disclosure template can be found, which presents the components of regulatory capital on transitional and end-point basis as at 31 December 2021 and at 31 December 2020. The disclosure has been prepared using the format set out in Annex VI of the "Commission Implementing Regulation (EU) No 1423/2013 of 20 December 2013 laying down implementing technical standards with regard to disclosure of own funds requirements for institutions according to Regulation (EU) No 575/2013 of European Parliament and of the Council.

Table 3: EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements

	Ref.	**31 December 2021 (1)** **€ million**	31 December 2021 € million	31 December 2020 (1) & (3) € million	31 December 2020 (3) € million
Total equity	*e*	4,447	4,447	4,164	4,164
Regulatory adjustments					
Part of interim or year-end profit not eligible		-	(469)	-	(15)
Cash flow hedge reserves	*d*	12	12	49	49
Adjustments due to IFRS 9 transitional arrangements		420	420	683	683
Intangible assets	*a*	(116)	(116)	(117)	(117)
of which Goodwill		-	-	-	-
IRB shortfall of credit risk adjustments to expected losses		(254)	(254)	(223)	(223)
Deferred tax assets that rely on future profitability (unused tax losses)	*b*	-	-	-	-
Deferred tax assets arising from temporary differences (amount above 10% threshold)	*c*	(366)	(413)	(284)	(285)
Prudent Valuation Adjustments		(10)	(10)	(11)	(11)
Other regulatory adjustments		(36)	(36)	(16)	(16)
Amount exceeding the 17.65% threshold		-	-	-	-
Common Equity Tier I capital		**4,096**	3,580	4,245	4,229
Regulatory adjustments		-	-	-	-
Total Tier I capital		**4,096**	3,580	4,245	4,229
Tier II capital - subordinated debt		950	950	950	950
IRB Excess of impairment allowances over expected losses eligible		-	-	-	-
Total Regulatory Capital		**5,046**	4,530	5,195	5,179
Risk Weighted Assets		**32,983**	32,865	34,185	34,181
Ratios					
Common Equity Tier I		**12.4%**	10.9%	12.4%	12.4%
Tier I		**12.4%**	10.9%	12.4%	12.4%
Total Capital Adequacy Ratio		**15.3%**	13.8%	15.2%	15.2%

(1) *Including profits € 469 million for year ended 31 December 2021 and €15 million for year ended 31 December 2020.*

(2) *The pro-forma CET1 and Total Capital Adequacy ratios as at 31 December 2021 with the completion of the sale of Eurobank's merchant acquiring business would be 13.4% and 16.3%, respectively.*

(3) *The table above for the year ended 31 December 2020 has not been restated following the retrospective application of IFRIC agenda decision - Attributing Benefit to Periods of Service (IAS 19).*

(4) *The Bank's CET1 ratio as at 31 December 2021, based on the full implementation of the Basel III rules in 2025 (fully loaded CET1), would be 11.7% (31 December 2020 including profits: 10.7%).*

Capital Management

The CET1 ratio is defined as CET1 capital divided by RWAs, the Tier 1 ratio is defined as Tier 1 capital divided by RWAs and Total Capital Adequacy ratio is defined as Total Regulatory Capital divided by RWAs.

As at 31 December 2021, pursuant to the Law 4172/2013, as in force, the Bank's eligible DTAs/deferred tax credits (DTCs) against the Greek State amounted to € 3,547 million. The DTCs will be converted into directly enforceable claims (tax credit) against the Greek State provided that the Bank's after tax accounting result for the year is a loss. In particular, DTCs are accounted for on: (a) the losses from the Private Sector Involvement (PSI) and the Greek State Debt Buyback Program and (b) on the sum of (i) the unamortized part of the crystallized loan losses from write-offs and disposals, (ii) the accounting debt write-offs and (iii) the remaining accumulated provisions and other losses in general due to credit risk recorded up to 30 June 2015. For further details, please refer to Financial Statements, Note 13.

According to Regulation (EU) No. 575/2013, article 39, deferred tax assets that can be replaced with a tax credit, shall not be deducted from CET1, but instead be risk weighted by 100%.

2.5 IFRS 9 capital impact

Regarding IFRS 9 adoption from 1.1.2018 and according to Regulation (EU) 2017/2395 of the European Parliament and the Council, a five-year transition period is introduced, which allows banks to add back to their CET 1 capital 95% of IFRS 9 impact in 2018 and 85%, 70%, 50% and 25% in the subsequent four years. The full impact is expected as of 1 January 2023.

According to the CRR 'quick fix' relief package, the IFRS 9 transitional arrangements have been extended by two years and a new calculation has been introduced where 100% relief is applied in 2020 and 2021 for increases in stage 1 and stage 2 provisions from 1 January 2020. Accordingly, the relief applied for 2022 is 75%, for 2023 50% and for 2024 25%.

The Bank has elected to apply the phase in approach for mitigating the impact of IFRS 9 transition on the regulatory capital.

In addition, the CRR 'quick fix' with the Article 468 introduces a temporary treatment that allows institutions to remove from the calculation of their CET1 items unrealised gains and losses measured at fair value through other comprehensive income during the period from 1 January 2020 to 31 December 2022.

The Group is not applying the temporary treatment specified in Article 468 therefore the own funds, capital and leverage ratios reflect the full impact of unrealised gains and losses measured at fair value through other comprehensive income.

Capital Management

Table 4: EU IFRS-FL: Template on the comparison of Institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs.

Available capital	31 December 2021 [(1)] € million	31 December 2021 € million	31 December 2020 [(1) & (3)] € million	31 December 2020 [(3)] € million
Common Equity Tier 1 (CET1) capital	4,096	3,580	4,245	4,229
Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	3,913	3,397	3,768	3,752
Fully Loaded Common Equity Tier 1 (CET1) capital	3,841	3,325	3,634	3,618
Tier 1 capital	4,096	3,580	4,245	4,229
Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	3,913	3,397	3,768	3,752
Fully Loaded Tier 1 capital	3,841	3,325	3,634	3,618
Total capital	5,046	4,530	5,195	5,179
Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	4,952	4,436	4,833	4,817
Fully Loaded Total capital	4,880	4,364	4,699	4,683
Risk weighted assets				
Total risk-weighted assets	32,983	32,865	34,185	34,181
Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	32,889	32,772	34,043	34,039
Fully Loaded Total risk-weighted assets	32,889	32,772	34,043	34,039
Capital ratios				
Common Equity Tier 1 (as a percentage of risk exposure amount)	12.4%	10.9%	12.4%	12.4%
Common Equity Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	11.9%	10.4%	11.1%	11.0%
Fully Loaded Common Equity Tier 1 (as a percentage of risk exposure amount)	11.7%	10.1%	10.7%	10.6%
Tier 1 (as a percentage of risk exposure amount)	12.4%	10.9%	12.4%	12.4%
Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	11.9%	10.4%	11.1%	11.0%
Fully Loaded Tier 1 (as a percentage of risk exposure amount)	11.7%	10.1%	10.7%	10.6%
Total capital (as a percentage of risk exposure amount)	15.3%	13.8%	15.2%	15.2%
Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15.1%	13.5%	14.2%	14.2%
Fully Loaded Total capital (as a percentage of risk exposure amount)	14.8%	13.3%	13.8%	13.8%

	31 December 2021 [(1)] € million	31 December 2021 € million	31 December 2020 [(1)] € million	31 December 2020 € million
Leverage ratio				
Leverage ratio total exposure measure	54,851	54,804	53,590	53,589
Leverage ratio	7.47%	6.53%	7.92%	7.89%
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7.12%	6.19%	7.03%	7.00%
Fully Loaded Leverage ratio	6.99%	6.06%	6.75%	6.72%

(1) *Including profits € 469 million for year ended 31 December 2021 and €15 million for year ended 31 December 2020.*

(2) *The pro-forma CET1 and Total Capital Adequacy ratios as at 31 December 2021 with the completion of the sale of Eurobank's merchant acquiring business would be 13.4% and 16.3%, respectively.*

(3) *The table above for the year ended 31 December 2020 has not been restated following the retrospective application of IFRIC agenda decision - Attributing Benefit to Periods of Service (IAS 19).*

2.6 Countercyclical buffer

The Countercyclical buffer (CCyB) will be applied when the authorities deem that lending growth is giving rise to an unacceptable accumulation of systemic risks. This buffer is specifically calculated for each bank or group and consists of the weighted average of percentages of countercyclical buffers applied in regions in which the bank's credit exposures are located.

The table below shows the geographical distribution of the Bank's credit exposures relevant for the calculation of its countercyclical capital buffer and the amount of its institution specific countercyclical capital buffer.

Table 5: EU CCyB1 – Geographical distribution of credit exposures relevant for the calculation of countercyclical buffer

	31 December 2021												
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures		Own funds requirements						
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposure for internal models	Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own funds requirements weights	Counter-cyclical capital buffer rate
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	(%)	(%)
Breakdown by country:													
Greece	5,898	25,214	-	-	7	31,119	1,444	-	1	1,445	18,063	77%	0.00%
Romania	138	-	-	-	-	138	10	-	-	10	125	1%	0.00%
Bulgaria	5	194	-	-	-	199	30	-	-	30	375	2%	0.50%
United Kingdom	111	13	-	-	32	156	11	-	1	12	150	1%	0.00%
Cyprus	45	38	-	-	-	83	15	-	-	15	188	1%	0.00%
Luxemburg	24	179	-	-	586	789	31	-	7	39	488	2%	0.50%
Serbia	-	160	-	-	-	160	24	-	-	24	300	1%	0.00%
Other Countries	511	1,103	-	-	6,304	7,780	203	-	110	312	3,900	16%	0.00%
Total	6,732	26,901	-	-	6,929	40,424	1,768	-	119	1,887	23,589	100%	0.02%

	31 December 2020												
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures		Own funds requirements						
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposure for internal models	Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own funds requirements weights	Counter-cyclical capital buffer rate
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	(%)	(%)
Breakdown by country:													
Greece	6,504	26,297	-	-	8	32,809	1,629	-	1	1,630	20,371	81%	0.00%
Romania	207	45	-	-	-	252	18	-	-	18	225	1%	0.00%
Bulgaria	-	189	-	-	-	189	29	-	-	29	363	1%	0.50%
United Kingdom	86	2	-	-		88	4	-	-	4	50	0%	0.00%
Cyprus	-	31	-	-	-	31	5	-	-	5	63	0%	0.00%
Luxemburg	18	171	-	-	-	189	30	-	-	30	375	1%	0.25%
Serbia	-	233	-	-	-	233	35	-	-	35	438	2%	0.00%
Other Countries	417	1,071	-	-	1,097	2,585	192	-	80	272	3,400	13%	0.00%
Total	7,232	28,039	-	-	1,105	36,376	1,942	-	81	2,023	25,285	100%	0.01%

Capital Management

The following table provides an overview of Group's specific countercyclical capital risk exposure and buffer requirements.

Table 6: EU CCyB2 – Amount of institution-specific countercyclical capital buffer

	31 December 2021	31 December 2020
Total risk exposure amount (€ million)	32,865	34,181
Institution specific countercyclical capital buffer rate	0.02%	0.01%
Institution specific countercyclical capital buffer requirement (€ million)	6	4

2.7 Supervisory Review and Evaluation Process (SREP) capital requirements

According to the decision of the 2020 SREP performed by the ECB, and the capital relief measures granted by the ECB in response to the Covid-19 outbreak starting from 18 March 2020, the Bank was required to meet on an individual basis a CET1 ratio of at least 8.71% and a Total Capital Adequacy Ratio of at least 13.52% (Overall Capital Requirements including CCB) and the applicable Countercyclical Capital Buffer of 0.02% for the last quarter of 2021 stemming from the exposures in Bulgaria and Luxemburg).

The table below shows the capital requirements of the Bank for 31 December 2021.

Table 7: Pillar 2 Requirements

	31 December 2021	
	CET1 Capital Requirements	Total Capital Requirements
Minimum regulatory requirement	4.50%	8.00%
Pillar 2 Requirement (P2R)	1.69%	3.00%
Total SREP Capital Requirement (TSCR)	**6.19%**	**11.00%**
Combined Buffer Requirement (CBR)		
Capital conservation buffer (CCB)	2.50%	2.50%
Countercyclical capital buffer (CCyB)	0.02%	0.02%
Overall Capital Requirement (OCR)	**8.71%**	**13.52%**

In response to the Covid-19 outbreak, on 12 March 2020, the ECB announced a number of measures to ensure that its directly supervised banks can continue to fulfil their role in funding the real economy. Specifically, banks have been allowed, among others, to operate temporarily below the level of capital defined by the Pillar 2 Guidance and the CCB. Also, banks are allowed to partially use capital instruments that do not qualify as CET1 capital (i.e. AT1 or Tier 2 instruments), to meet the Pillar 2 Requirements (P2R). At individual level, the Pillar 2 Requirement is set at 3% for 2020 and part of that (1.69%) must be held in the form of CET1 capital while the Bank may use AT1 and Tier 2 capital, where available, for the remaining part. The amount of additional own funds required on an individual basis to be met with CET1 capital is € 573 million. According to the FAQs published by the ECB, the above allowance provided to banks to operate below the combined buffer requirement results in the ECB taking a flexible approach to approving capital conservation plans that banks are legally required to submit if they breach that requirement. On 10 February 2022, the ECB announced that it will not allow banks to operate below the level of capital defined by their Pillar 2 Guidance beyond December 2022.

As at 31 December 2021, Eurobank's transitional CET1 ratio and Total Capital ratio were 10.9% and 13.8% respectively, which exceeded the 2021 transitional minimum requirements of 8.71% and 13.52%.

According to the 2021 SREP decision, for 2022, the Bank is required to meet on an individual Basis a CET1 ratio of at least 9.46% and a Total Capital Adequacy Ratio of at least 14.27% (Overall Capital Requirements including CCB of 2.5%, Other

Capital Management

Systemically Important Institution buffer of 0.75% and Countercyclical Buffer of 0.02% stemming from the exposures in Bulgaria and Luxemburg).

2.8 Capital requirements under Pillar 1

The table below shows the Bank's risk weighted assets (RWAs) and capital requirements as at 31 December 2021 and 31 December 2020. The minimum capital requirements under Pillar 1 are calculated as 8% of RWAs.

Table 8: EU OV1 – Overview of risk weighted exposure amounts

	Risk weighted exposure amounts (RWEAs)				Total own funds requirements
	31 December 2021 [1] € million	31 December 2021 € million	31 December 2020 [1] & [3] € million	31 December 2020 [3] € million	31 December 2021 € million
Credit risk (excluding CCR)	**27,093**	**27,093**	29,050	29,050	**2,167**
Of which the standardised approach	9,977	9,976	9,972	9,972	798
Of which the foundation IRB (FIRB) approach	5,634	5,635	6,965	6,965	451
Of which: slotting approach	2,879	2,879	2,122	2,122	230
Of which: equities under the simple riskweighted approach	4,015	4,015	4,027	4,027	321
Of which the advanced IRB (AIRB) approach	4,588	4,588	5,964	5,964	367
Counterparty credit risk - CCR	**453**	**453**	396	396	**36**
Of which the standardised approach	249	249	193	193	20
Of which internal model method (IMM)	-	-	-	-	-
Of which exposures to a CCP	11	11	8	8	1
Of which credit valuation adjustment - CVA	106	106	72	72	8
Of which other CCR	87	87	123	123	7
Settlement risk	-	-	-	-	-
Securitisation exposures in the non trading book (after the cap)	**1,487**	**1,487**	1,011	1,011	**119**
Of which SEC-IRBA approach	283	283	28	28	23
Of which SEC-ERBA (including IAA)	136	136	25	25	11
Of which SEC-SA approach	1,068	1,068	958	958	85
Of which 1250%/ deduction	-	-	-	-	-
Position, foreign exchange and commodities risks (Market risk)	**620**	**620**	559	559	**50**
Of which the standardised approach	-	-	1	1	-
Of which IMA	620	620	558	558	50
Large exposures	-	-	-	-	-
Operational risk	**2,082**	**2,082**	2,092	2,092	**167**
Of which basic indicator approach	-	-	-	-	-
Of which standardised approach	2,082	2,082	2,092	2,092	167
Of which advanced measurement approach	-	-	-	-	-
Amounts below the thresholds for deduction (subject to 250% risk weight)	**1,247**	**1,130**	1,077	1,073	**90**
Total	**32,982**	**32,865**	34,185	34,181	**2,629**

(1) *Including profits € 469 million for year ended 31 December 2021 and €15 million for year ended 31 December 2020.*

(2) *The pro-forma CET1 and Total Capital Adequacy ratios as at 31 December 2021 with the completion of the sale of Eurobank's merchant acquiring business would be 13.4% and 16.3%, respectively.*

(3) *The table above for the year ended 31 December 2020 has not been restated following the retrospective application of IFRIC agenda decision - Attributing Benefit to Periods of Service (IAS 19).*

(4) *The decrease of the RWAs compared to 31 December 2020 is mainly due to decrease of RWAs from* "Mexico" securitization and "Wave" transactions.

Capital Management

The table below shows the Bank's significant investments in insurance undertakings which are not deducted from CET 1 because the total investment does not exceed the 10% of the aggregate amount of CET1 before certain deductions.

Table 9: INS1 – Non deducted participation in insurance undertakings

	31 December 2021		31 December 2020	
	Exposure value	Risk-weighted exposure amount	Exposure value	Risk-weighted exposure amount
	€ million	€ million	€ million	€ million
Own fund instruments held in insurance or re-insurance undertakings or insurance holding company not deducted from own funds	23	58	23	57

2.9 Internal Capital Adequacy Assessment Process (ICAAP)

In the context of the ICAAP performed at Group level, the objective is to identify and assess risks that are inherent in the Group's business model, determine their materiality and allocation both at Group and entity level, evaluate risk monitoring and risk mitigation processes and quantify the relevant internal capital charge where appropriate so as to ensure the ongoing capital adequacy of the Group versus its risk profile.

As regards the Bank (covered by the Group ICAAP as well), to accomplish these objectives, the ICAAP leverages upon and integrates the Bank's well-established activities on risk, capital and performance management, including in particular planning and monitoring, while also continuously refining its approach to ensure high standards of capital assessment and management.

Oversight and ultimate responsibility for the ICAAP lies with the BoD, which has assumed a leading role in developing a risk conscious organization and maintaining the Bank's risk management at high levels of sophistication. The BoD's vision and guidance are distilled in the Bank's risk appetite, which describes the risk boundaries within which the Bank is willing to operate. Prior to its approval, the BoD and the senior management discuss and challenge the ICAAP in an effective way.

Moreover, acting as an evaluation mechanism of the Bank's entire risk management framework, an integral component of ICAAP is the identification, assessment and quantification of current and emerging risks in terms of their materiality at Bank, thus allowing the organization to focus its resources and management attention to those risks that could potentially threaten its business or capital standing and ensuring that all material risks are properly managed and monitored.

Material risks are evaluated qualitatively and quantitatively, as appropriate. The aggregation of the individual capital charges comprises the Group's total internal capital requirement, meaning the amount of capital the Bank needs to hold for the purpose of absorbing unexpected losses deriving from its risk profile.

All categories of material risks are appropriately managed and the relevant frameworks are regularly evaluated in order to identify ways of strengthening the risk management structure, enhance existing policies, establish new mitigation techniques and improve the internal calculation of capital requirements. Risk and capital management responsibility, including compliance with regulatory requirements and corporate policies, lies with the Bank's senior management.

The Bank uses the regulatory capital requirements as a starting point for the internal determination of its capital requirements ("internal capital"), adjusting for additional capital where appropriate. Compared to regulatory capital requirements, "internal capital" since it takes into account a wider range of risks and utilizes more sophisticated calculation approaches. This approach allows the Bank to leverage its advanced risk measurement infrastructure.

Regular scenario-based simulations and stress tests are also used in order to assess specific risks as well as the overall risk profile. Stress tests can be classified as follows:

- Risk specific stress tests, where particular risk factors, exposures or portfolios are stressed at a range of severities in order to assess individual risk impacts and threshold effects.
- Integrated stress tests across risks, which evaluate the resilience of the Bank's capital position to adverse economic conditions, in case of a systemic deterioration of the business environment in a macroeconomic downturn.
- Reverse stress tests, which assess the resilience of the Bank's capital position to specific adverse circumstances starting from the identification of a pre-defined outcome (e.g. points at which an institution business model becomes unviable, or at which the institution can be considered as failing or likely to fail in the meaning of Article 32 of Directive 2014/59/EU) and then exploring scenarios and circumstances that might cause this outcome to occur.

The Bank also develops forecasts on capital consumption and availability and integrates them into the strategic planning process so as to optimize capital return and allocation, whilst maintaining adequate capital levels. The results of the stress tests are utilised during the capital planning process to ensure that the contingency plans in place are adequate if stressed conditions materialize and to produce a set of plausible action plans to mitigate the impact of the assumed stress scenario.

The Bank maintains adequate pre-provision earnings in the medium term and robust risk management practices, which along with the capital actions already executed or underway, allow the Bank to meet both regulatory and internal capital requirements. As a result, the Bank will be in a position to support the risk profile of its balance sheet and its business operations going forward, even under further adverse conditions, should they materialize.

2.10 Internal Liquidity Adequacy Assessment Process (ILAAP)

ILAAP is the internal process for the identification, measurement, management and monitoring of liquidity risk as implemented by the institution according to Article 86 of Directive 2013/36/EU.

The Group's ILAAP covers the following areas:

- Liquidity and funding risk management framework: identification of the functions/units and management committees responsible for the policy making, management, control, monitoring and reporting of liquidity and funding risk.
- Description of the liquidity and funding risks: comprehensive description of the liquidity and funding risks that the Group faces taking into account the current macro-economic environment as long as country-specific and idiosyncratic factors.
- Liquidity risk monitoring process and stress testing: detailed description of the processes, tools and reports that the Group uses for the monitoring and the control of liquidity risk, with particular emphasis on the following: stress test analysis, liquidity buffer analysis, liquidity & funding indicators.
- Contingency funding plan and liquidity & funding strategy: description of the contingency funding plan and the liquidity and funding strategy.
- Information on strategy regarding liquidity buffers and collateral management.
- Information of cost benefit allocation mechanism.
- Information on intraday liquidity risk management.

3. Credit Risk

3.1 Definition of credit risk

Credit risk is the risk that a counterparty will be unable to fulfill its payment obligations in full when due. Credit risk also includes country risk and settlement risk.

Country risk is the risk of losses arising from economic difficulties or political unrest in a country, including the risk of losses following nationalization, expropriation and debt restructuring.

Settlement risk is the risk arising when payments are settled, for example for trades in financial instruments, including derivatives and currency transactions. The risk arises when the Bank remits payments before it can ascertain that the counterparties' payments have been received.

Credit risk arises principally from the wholesale and retail lending activities of the Bank, including from credit enhancement provided, such as financial guarantees and letters of credit. The Bank is also exposed to credit risk arising from other activities such as investments in debt securities, trading activities, capital markets and settlement activities. Taking into account that credit risk is the principal risk the Bank is exposed to, it is very closely managed and is monitored by centralised dedicated risk units, reporting to the GCRO.

3.2 Credit exposures

3.2.1 Maturity analysis

The following table presents a breakdown of net exposures by residual maturity and exposure classes as at 31 December 2021 and at 31 December 2020.

Table 10: EU CR1-A – Maturity analysis of exposures

	31 December 2021 [(3)]					
	Net exposure value					
	On demand € million	<= 1 year € million	> 1 year <= 5 years € million	> 5 years € million	No stated maturity € million	Total € million
Central governments or central banks	-	-	-	-	-	-
Institutions	-	-	-	-	-	-
Corporates	-	318	9,219	1,934	-	**11,471**
Retail	-	1,194	1,287	7,346	-	**9,827**
Equity	-	-	-	-	2,089	**2,089**
Total IRB approach	**-**	**1,512**	**10,506**	**9,280**	**2,089**	**23,387**
Central governments or central banks	-	24,305	1,554	4,217	4,026	**34,102**
Regional governments or local authorities	-	2	17	12	-	**31**
Public sector entities	-	-	-	-	706	**706**
Multilateral development banks	-	10	-	-	-	**10**
International organisations	-	-	-	-	-	-
Institutions	-	3,026	87	2,346	40	**5,499**
Corporates	-	99	320	375	-	**794**
Retail	-	76	119	313	-	**508**
Secured by mortgages on immovable property	-	9	106	1,685	-	**1,800**
Exposures in default	-	92	17	50	4	**163**
Items associated with particularly high risk	-	-	-	-	-	-
Covered bonds	-	-	57	-	-	**57**
Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
Collective investments undertakings	-	-	-	-	-	-
Equity exposures	-	-	-	-	69	**69**
Other exposures	326	97	-	-	2,868	**3,291**
Total standardised approach	**326**	**27,717**	**2,277**	**8,998**	**7,713**	**47,031**
Total	**326**	**29,229**	**12,783**	**18,278**	**9,802**	**70,418**

	31 December 2020 [(3)]					
	Net exposure value					
	On demand € million	<= 1 year € million	> 1 year <= 5 years € million	> 5 years € million	No stated maturity € million	Total € million
Central governments or central banks	-	-	-	-	-	-
Institutions	-	-	-	-	-	-
Corporates	-	2,438	5,400	2,930	53	10,821
Retail	-	214	1,260	7,857	1,117	10,448
Equity	-	-	-	-	2,087	2,087
Total IRB approach	-	2,652	6,660	10,787	3,257	23,356
Central governments or central banks	-	14,797	743	4,282	4,249	24,071
Regional governments or local authorities	-	-	9	28	-	37
Public sector entities	-	-	-	-	708	708
Multilateral development banks	-	49	-	-	-	49
International organisations	-	171	-	-	-	171
Institutions	-	2,625	90	2,674	49	5,438
Corporates	-	84	238	241	-	563
Retail	-	83	141	501	-	725
Secured by mortgages on immovable property	-	13	110	1,986	-	2,109
Exposures in default	-	193	81	419	70	763
Items associated with particularly high risk	-	-	-	-	-	-
Covered bonds	-	-	47	11	-	58
Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
Collective investments undertakings	-	-	-	-	-	-
Equity exposures	-	-	-	-	24	24
Other exposures	272	98	-	-	2,589	2,959
Total standardised approach	272	18,113	1,459	10,142	7,689	37,675
Total	272	20,765	8,119	20,929	10,946	61,031

[(1)] The table above does not include securitisations and Off Balance Sheet items.

[(2)] Exposures with counterparties are included in the table.

[(3)] The increase of the exposures in central governments or central banks is mainly due to the increase of liquidity received from Eurosystem Funding (TLTRO) and the increase of customer deposits.

[(4)] The increase of the exposures in the corporates is mainly due to increased position in corporate bonds.

3.3 Credit quality of financial assets

The Bank recognizes allowance for Expected Credit Losses (ECL) that reflect changes in credit quality since initial recognition to financial assets that are measured at AC and FVOCI, including loans, securitised notes issued by special purpose vehicles established by the Bank, lease receivables, debt securities, financial guarantee contracts, and loan commitments.

a. Definitions

Loans and advances to customers, including securitised notes issued by special purpose entities established by the Bank, carried at amortised cost are classified depending on how ECL is measured.

Accordingly, loans reported as non-impaired include loans for which a '12-month ECL allowance' is recognised as they exhibit no significant increase in credit risk since initial recognition and loans for which a 'Lifetime ECL allowance' is recognised as they exhibit a significant increase in credit risk since initial recognition but are not considered to be in default.

Credit impaired loans category includes loans that are considered to be in default, for which a loss allowance equal to 'Lifetime ECL' is recognised and loans classified as 'Purchased or originated credit impaired' (POCI) which are always measured on the basis of ECL.

Regulatory definitions

As of 1 January 2021, the Bank applied the new definition of default (DoD) for regulatory purposes, as is set in the Article 178 of Regulation (EU) No. 575/2013, the Commission Delegated Regulation (EU) 2018/171 and EBA Guidelines (EBA/GL/2016/07). The new DoD aims at the harmonization of the definition of defaulted exposures across institutions and jurisdictions in the European Union and introduced a new set of standards with a significant impact on governance, data, processes, systems and credit models. In particular, the main changes introduced by the new DoD guidelines specify that days past due are counted from the date that both materiality thresholds are breached (an absolute amount of the total exposure and a relative as a percentage of the exposure for more than 90 days past due), include conditions for a return to non-defaulted status (introduction of a three month probation period for non-forborne exposures) and additional unlikely to pay triggers such us the diminished financial obligation criterion for restructured loans (ie. difference between the net present value of cash flows before and after the restructuring exceeds the threshold of 1%).

The Bank applied the new provisions of DoD, in order to identify defaulted exposures starting from 1 January 2021, consistently across all its lending portfolios and subsidiaries, subject to local regulations and specific credit risk characteristics of each jurisdiction. Accordingly, the perimeters of the credit impaired loans under IFRS9, the non-performing exposures under EBA guidelines and defaulted exposures for regulatory purposes have been aligned. The effect from the implementation of the new DoD on the Bank's expected credit losses was neutral since any negative effect, due to introduction of new DoD to the lending exposures' probability of default was almost entirely off-set by the improvement of the cure rates as these reflected in the lending exposures loss given default.

b. Impairment indicators

To determine the risk of default, the Bank applies a default definition for accounting purposes, which is consistent with the EBA definition for non-performing exposure and regulatory definition of default as applied by the Bank on 1 January 2021. The accounting definition of default is also consistent with the one used for internal credit risk management purposes.

A financial asset is credit-impaired when one or more events that have a detrimental impact on the estimated future cash flows of that exposure have occurred:

- The borrower faces a significant difficulty in meeting his financial obligations;

- There has been a breach of contract, such as a default or unpaid amounts, above specified materiality thresholds, for more than 90 consecutive days;
- The Bank, for economic or contractual reasons relating to the borrower's financial difficulty, has granted to the borrower a concession(s) that the Bank would not otherwise consider;
- There is a probability that the borrower will enter bankruptcy or other financial re-organization;
- For Purchased or originated credit impaired (POCI) financial assets, a purchase or origination at a deep discount that reflects incurred credit losses is considered a detrimental event. The Bank assesses the deep discount criterion following a principle -based approach with the aim to incorporate all reasonable and supportable information which reflects market conditions that exist at the time of the assessment.

For debt securities, the Bank determines the risk of default using an internal credit rating scale. The Bank considers debt securities as credit impaired if the internal credit rating of the issuer/counterparty corresponds to a rating equivalent to "C" (Moody's rating scale) or the external rating of the issuer/counterparty at the reporting date is equivalent to "C" (Moody's rating scale) and the internal rating is not available.

Further information is provided in the Financial Statements note 2.

c. Impairment assessment

Determining whether a loss allowance should be based on 12-month expected credit losses or lifetime expected credit losses depends on whether there has been a significant increase in credit risk (SICR) of the financial assets, issued loan commitments and financial guarantee contracts, since initial recognition.

At each reporting date, the Bank performs an assessment as to whether the risk of a default occurring over the remaining expected lifetime of the exposure has increased significantly from the expected risk of a default estimated at origination for that point in time. The assessment for SICR is performed using both qualitative and quantitative criteria based on reasonable and supportable information that is available without undue cost or effort including forward looking information and macroeconomic scenarios as well as historical experience.

The assessment of loss allowance is performed either on an individual basis or on a collective basis for groups of similar items with homogeneous credit risk characteristics. The Bank applies the same principles for assessing significant increase in credit risk (SICR) since initial recognition when estimating ECLs on a collective or on an individual basis.

The Bank segments its lending exposures on the basis of shared credit risk characteristics for the purposes of both assessing significant increase in credit risk and measuring loan loss allowance on a collective basis. The different segments aim to capture differences in PDs and in the rates of recovery in the event of default.

The shared credit risk characteristics used for the segmentation of exposures include several elements such as: instrument type, portfolio type, asset class, product type, industry, originating entity, credit risk rating, remaining term to maturity, geographical location of the borrower, value of collateral to the financial asset, forbearance status and days in arrears.

Furthermore, Management may apply temporary collective adjustments when determining whether credit risk has increased significantly since initial recognition on exposures that share the same credit risk characteristics to reflect macro-economic or other factors which are not adequately addressed by the current credit risk models. These factors may depend on information such as the type of the exposure, counterparty's specific information and the characteristics of the financial instrument, while their application requires the application of significant judgment.

The Bank identifies individually significant exposures and performs the ECL measurement based on borrower specific information for both retail and wholesale portfolios. This measurement is performed at a borrower level, hence the criteria are defined at this level, while both qualitative and quantitative factors are taken into consideration including forward looking information.

For the remaining retail and wholesale exposures, ECL are measured on a collective basis. This incorporates borrower specific information, collective historical experience of losses and forward-looking information. For debt securities and securitised notes issued by special purpose entities established by the Bank, the measurement of impairment losses is performed on an individual basis.

d. Impairment measurement

The measurement of ECL is an unbiased probability-weighted average estimate of credit losses that reflects the time value of money, determined by evaluating a range of possible outcomes. A credit loss is the difference between the cash flows that are due to the Bank in accordance with the contractual terms of the instrument and the cash flows that the Bank expects to receive (i.e. cash shortfalls) discounted at the original effective interest rate (EIR) of the same instrument, or the credit-adjusted EIR in case of POCI. In measuring ECL, information about past events, current conditions and reasonable and supportable forecasts of future conditions are considered. For undrawn commitments, ECLs are calculated as the present value of the difference between the contractual cash flows due if the commitment was drawn down and the expected cash flows while for financial guarantees ECLs are measured as the expected payments to reimburse the holder less any amounts that the Bank expects to receive.

The Bank estimates expected cash shortfalls, which reflect the cash flows expected from all possible sources, including collateral guarantees and other credit enhancements that are part of the contractual terms and are not recognised separately. In case of a collateralized financial instrument, the estimated expected cash flows related to the collateral reflect the amount and timing of cash flows that are expected from liquidation less the discounted costs of obtaining and selling the collateral, irrespective of whether liquidation is probable.

ECL are calculated over the maximum contractual period over which the Bank is exposed to credit risk, which is determined based on the substantive terms of the instrument, or in case of revolving credit facilities, by taking into consideration factors such as the Bank’s expected credit risk management actions to mitigate credit risk and past practice.

Receivables from customers arising from the Bank’s activities other than lending, are presented under Other Assets and are typically short term. Therefore, considering that usually there is no significant financing component, the loss allowance for such financial assets is measured at an amount equal to the lifetime expected credit losses under the simplified approach.

ECL key inputs

The ECL calculations are based on the term structures of the probability of default (PD), the loss given default (LGD), the exposure at default (EAD) and other input parameters such as the credit conversion factor (CCF) and the prepayment rate. Generally, the Bank derives these parameters from internally developed statistical models and observed point-in-time and historical data, or by international rating agencies, where applicable, leveraging the existing infrastructure development for the regulatory framework and risk management practices.

The PD, LGD and EAD used for accounting purposes may differ from those used for regulatory purposes. For the purposes of IFRS 9 impairment measurement, PD is a point-in-time estimate whereas for regulatory purposes PD is a ‘through-the-cycle’ estimate. In addition, LGD and EAD for regulatory purposes are based on loss severity experienced during economic downturn conditions, while for impairment purposes, LGD and EAD reflect unbiased and probability-weighted estimates.

Credit Risk

The following table presents an overview of the quality of forborne exposures as at 31 December 2021 and at 31 December 2020.

Table 11: EU CQ1 - Credit quality of forborne exposures

	31 December 2021							
	Gross carrying amount/nominal amount with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
	Performing forborne	Non-performing forborne	Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures		Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
Loans and advances	**1,732**	**872**	**868**	**854**	**(97)**	**(297)**	**1,910**	**527**
Central banks	-	-	-	-	-	-	-	-
General governments	-	-	-	-	-	-	-	-
Credit institutions	-	-	-	-	-	-	-	-
Other financial corporations	-	13	13	13	-	(8)	5	5
Non-financial corporations	589	622	622	604	(41)	(210)	845	379
Households	1,143	237	233	237	(56)	(79)	1,060	143
Debt Securities	-	-	-	-	-	-	-	-
Loan commitments given	-	-	-	-	-	-	-	-
Total	**1,732**	**872**	**868**	**854**	**(97)**	**(297)**	**1,910**	**527**

	31 December 2020							
	Gross carrying amount/nominal amount with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
	Performing forborne	Non-performing forborne	Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures		Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
Loans and advances	2,740	1,492	1,072	1,457	(246)	(679)	2,775	774
Central banks	-	-	-	-	-	-	-	-
General governments	-	-	-	-	-	-	-	-
Credit institutions	-	-	-	-	-	-	-	-
Other financial corporations	-	11	11	11	-	(8)	3	3
Non-financial corporations	998	699	587	664	(119)	(289)	1,075	389
Households	1,742	782	474	782	(127)	(382)	1,697	382
Debt Securities	-	-	-	-	-	-	-	-
Loan commitments given	-	-	-	-	-	-	-	-
Total	2,740	1,492	1,072	1,457	(246)	(679)	2,775	774

[(1)] *The decrease in forborne exposures is mainly due to Mexico transaction.*

Credit Risk

The following template provides an overview of credit quality of non-performing exposures as at 31 December 2021 and at 31 December 2020.

Table 12: **EU CQ3 -** Credit quality of performing and non-performing exposures by past due days

	31 December 2021											
	Gross carrying amount/nominal amoumt											
	Performing exposures			Non-performing exposures								
		Not past due or Past due <= 30 days	Past due >30 days <= 90 days		Unlikely to pay that are not past-due or past-due <=90 days	Past due > 90 days <=180 days	Past due > 180 days <=1 year	Past due > 1 year <=2 year	Past due > 2 year <=5 year	Past due > 5 year <= 7 year	Past due > 7 years	Of which defaulted
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand deposits [1]	**8,047**	8,047	-	-	-	-	-	-	-	-	-	-
Loans and advances [2]	**31,158**	**31,039**	**119**	**2,429**	**859**	**110**	**220**	**313**	**652**	**42**	**232**	**2,425**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	32	32	-	1	-	-	-	1	-	-	-	1
Credit institutions	1,934	1,934	-	-	-	-	-	-	-	-	-	-
Other financial corporations	6,915	6,915	-	155	119	-	-	12	24	-	-	155
Non-financial corporations	12,823	12,792	31	1,689	526	45	104	244	575	23	171	1,689
of which SMEs	5,259	5,231	28	1,371	382	45	71	237	443	23	171	1,371
Households	9,454	9,366	88	584	214	65	116	56	53	19	61	580
Debt Securities	**8,885**	**8,885**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	6,518	6,518	-	-	-	-	-	-	-	-	-	-
Credit institutions	653	653	-	-	-	-	-	-	-	-	-	-
Other financial corporations	658	658	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	1,056	1,056	-	-	-	-	-	-	-	-	-	-
Off-balance sheet exposures	**5,724**			**444**								**444**
Central banks	-			-								-
General governments	242			19								19
Credit institutions	51			-								-
Other financial corporations	646			18								18
Non-financial corporations	3,046			406								406
Households	1,739			1								1
Total	**45,767**	**39,924**	**119**	**2,873**	**859**	**110**	**220**	**313**	**652**	**42**	**232**	**2,870**

	31 December 2020											
	Gross carrying amount/nominal amoumt											
	Performing exposures			Non-performing exposures								
		Not past due or Past due <= 30 days	Past due >30 days <= 90 days		Unlikely to pay that are not past-due or past-due <=90 days	Past due > 90 days <=180 days	Past due > 180 days <=1 year	Past due > 1 year <=2 year	Past due > 2 year <=5 year	Past due > 5 year <= 7 year	Past due > 7 years	Of which defaulted
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand deposits	3,464	3,464	-	-	-	-	-	-	-	-	-	-
Loans and advances	30,900	30,713	187	4,848	1,190	134	189	645	825	700	1,165	4,428
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	39	39	-	-	-	-	-	-	-	-	-	-
Credit institutions	1,947	1,947	-	-	-	-	-	-	-	-	-	-
Other financial corporations	6,414	6,414	-	226	150	14	-	32	8	-	22	227
Non-financial corporations	12,481	12,401	80	2,347	481	55	101	363	484	280	583	2,235
of which SMEs	4,877	4,804	73	1,958	366	48	97	313	376	274	484	1,852
Households	10,019	9,912	107	2,275	559	65	88	250	333	420	560	1,966
Debt Securities	6,389	6,389	-	-	-	-	-	-	-	-	-	-
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	5,294	5,294	-	-	-	-	-	-	-	-	-	-
Credit institutions	395	395	-	-	-	-	-	-	-	-	-	-
Other financial corporations	56	56	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	644	644	-	-	-	-	-	-	-	-	-	-
Off-balance sheet exposures	4,825			459								458
Central banks	-			-								-
General governments	242			19								19
Credit institutions	50			-								-
Other financial corporations	453			33								33
Non-financial corporations	2,384			406								405
Households	1,696			1								1
Total	45,578	40,566	187	5,307	1,190	134	189	645	825	700	1,165	4,886

[1] *The increase of the exposures in central governments or central banks is mainly due to the increase of liquidity received from Eurosystem Funding (TLTRO) and the increase of customer deposits.*
[2] *The decrease in non-performing exposures is mainly due to Mexico transaction.*

Credit Risk

The following templates provide an overview of the credit quality of non-performing exposures and related impairments, provisions and valuation adjustments by portfolio and exposure class, by geography and by industry as at 31 December 2021 and at 31 December 2020.

Table 13: EU CR1 - Performing and non-performing exposures and related provisions

	31 December 2021														
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collaterals and financial guarantees received	
	Performing exposures			Non-performing exposures			Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
	€ million	of which: stage 1 € million	of which: stage 2 € million	€ million	of which: stage 2 € million	of which: stage 3 € million	€ million	of which: stage 1 € million	of which: stage 2 € million	€ million	of which: stage 2 € million	of which: stage 3 € million	€ million	€ million	€ million
Cash balances at central banks and other demand deposits [1]	**8,047**	**8,047**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**		**-**	**-**
Loans and advances [2]	**31,158**	**26,768**	**4,371**	**2,429**	**-**	**2,411**	**(408)**	**(132)**	**(276)**	**(1,187)**	**-**	**(1,172)**	**(305)**	**18,896**	**1,039**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	32	30	2	1	-	1	(1)	-	(1)	(1)	-	(1)	-	2	-
Credit institutions	1,934	1,934	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
Other financial corporations	6,915	6,895	10	155	-	155	(2)	(2)	-	(72)	-	(72)	(3)	4,875	14
Non-financial corporations	12,823	11,243	1,569	1,689	-	1,671	(205)	(86)	(119)	(856)	-	(841)	(102)	6,891	741
Of which: SMEs	5,259	4,110	1,144	1,371	-	1,357	(142)	(57)	(85)	(687)	-	(672)	(94)	3,526	609
Households	9,454	6,666	2,790	584	-	584	(199)	(43)	(156)	(258)	-	(258)	(200)	7,128	284
Debt Securities	**8,885**	**8,874**	**9**	**-**	**-**	**-**	**(16)**	**(15)**	**(1)**	**-**	**-**	**-**	**-**	-	-
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	6,517	6,517	-	-	-	-	(5)	(5)	-	-	-	-	-	-	-
Credit institutions	653	653	-	-	-	-	(5)	(5)	-	-	-	-	-	-	-
Other financial corporations	658	657	-	-	-	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	1,057	1,047	9	-	-	-	(6)	(5)	(1)	-	-	-	-	-	-
Off-balance sheet exposures	**5,724**	**5,193**	**290**	**444**	**-**	**444**	**(50)**	**(11)**	**(4)**	**(325)**	**-**	**(325)**		**948**	**11**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-		-	-
General governments	242	-	-	19	-	19	(36)	(1)	-	(18)	-	(18)		-	-
Credit institutions	51	51	-	-	-	-	-	-	-	-	-	-		-	-
Other financial corporations	646	646	-	18	-	18	-	-	-	(17)	-	(17)		132	-
Non-financial corporations	3,046	2,893	153	406	-	406	(9)	(5)	(4)	(290)	-	(290)		788	11
Households	1,739	1,603	137	1	-	1	(5)	(5)	-	-	-	-		28	-
Total	**53,814**	**48,882**	**4,670**	**2,873**	**-**	**2,855**	**(474)**	**(158)**	**(281)**	**(1,512)**	**-**	**(1,497)**	**(305)**	**19,844**	**1,050**

	31 December 2020														
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collaterals and financial guarantees received	
	Performing exposures			Non-performing exposures			Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
	€ million	of which: stage 1 € million	of which: stage 2 € million	€ million	of which: stage 2 € million	of which: stage 3 € million	€ million	of which: stage 1 € million	of which: stage 2 € million	€ million	of which: stage 2 € million	of which: stage 3 € million	€ million	€ million	€ million
Cash balances at central banks and other demand deposits	3,464	3,464	-	-	-	-	-	-	-	-	-	-		-	-
Loans and advances	30,900	25,654	5,232	4,848	-	4,810	(546)	(148)	(399)	(2,368)	-	(2,335)	(351)	17,247	2,239
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	39	22	17	-	-	-	(2)	(1)	(1)	-	-	-	-	2	-
Credit institutions	1,947	1,947	-	-	-	-	-	-	-	-	-	-	-	-	-
Other financial corporations	6,414	6,397	10	226	-	226	(11)	(11)	-	(113)	-	(113)	(8)	3,566	13
Non-financial corporations	12,481	10,239	2,235	2,347	-	2,309	(285)	(85)	(200)	(1,136)	-	(1,103)	(152)	6,260	1,138
of which SMEs	4,877	3,137	1,740	1,958	-	1,944	(208)	(44)	(164)	(955)	-	(941)	(145)	3,018	946
Households	10,019	7,049	2,970	2,275	-	2,275	(248)	(50)	(198)	(1,119)	-	(1,119)	(191)	7,419	1,088
Debt Securities	6,389	6,378	11	-	-	-	(13)	(12)	(1)	-	-	-	-	-	-
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	5,294	5,294	-	-	-	-	(4)	(4)	-	-	-	-	-	-	-
Credit institutions	395	395	-	-	-	-	(3)	(3)	-	-	-	-	-	-	-
Other financial corporations	56	56	-	-	-	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	644	633	11	-	-	-	(6)	(5)	(1)	-	-	-	-	-	-
Off-balance sheet exposures	4,825	4,188	394	459	-	459	(81)	(32)	(11)	(330)	-	(330)		677	10
Central banks	-	-	-	-	-	-	-	-	-	-	-	-		-	-
General governments	242	-	-	19	-	19	(38)	-	-	(18)	-	(18)		-	-
Credit institutions	50	50	-	-	-	-	-	-	-	-	-	-		-	-
Other financial corporations	453	404	49	33	-	33	(4)	(2)	(2)	(29)	-	(29)		125	-
Non-financial corporations	2,384	2,211	173	406	-	406	(16)	(10)	(6)	(283)	-	(283)		537	10
Households	1,696	1,524	172	1	-	1	(23)	(20)	(3)	-	-	-		15	-
Total	45,578	39,684	5,637	5,307	-	5,269	(640)	(192)	(411)	(2,698)	-	(2,665)	(351)	17,924	2,249

(1) The increase of the exposures in central governments or central banks is mainly due to the increase of liquidity received from Eurosystem Funding (TLTRO) and the increase of customer deposits.
(2) The decrease in non-performing exposures is mainly due to Mexico transaction.

Credit Risk

Table 14: **EU – CQ4** - Quality of Non-performing exposures by geography

	31 December 2021						
	Gross carrying/nominal amount						
		of which: non-performing		of which: subject to impairment	Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			of which defaulted				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million
On balance sheet exposures	**42,472**	**2,429**	**2,425**	**42,433**	**(1,596)**		**(15)**
Greece	29,465	2,359	2,359	29,450	(1,533)		(15)
Romania	236	16	12	232	(21)		-
Bulgaria	83	0	0	83	-		-
United Kingdom	1,300	0	0	1,300	(1)		-
Cyprus	516	12	12	516	(11)		-
Other countries	10,872	42	42	10,852	(30)		-
Off balance sheet exposures	**6,168**	**444**	**444**			**(375)**	
Greece	5,074	73	73			(81)	
Romania	194	134	134			(105)	
Bulgaria	196	190	190			(155)	
United Kingdom	6	-	-			-	
Cyprus	255	27	27			(27)	
Other countries	443	20	20			(7)	
Total	**48,640**	**2,873**	**2,869**	**42,433**	**(1,596)**	**(375)**	**(15)**

	31 December 2020						
	Gross carrying/nominal amount						
		of which: non-performing		of which: subject to impairment	Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			of which defaulted				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million
On balance sheet exposures	42,137	4,848	4,428	42,083	(2,895)		(32)
Greece	31,089	4,596	4,190	31,074	(2,778)		(14)
Romania	72	-	127	72	-		-
Bulgaria	83	-	-	83	-		-
United Kingdom	130	-	-	130	-		-
Cyprus	360	46	46	360	(42)		-
Other countries	10,403	206	65	10,364	(75)		(18)
Off balance sheet exposures	5,284	459	458			(411)	
Greece	4,442	56	55			(105)	
Romania	209	146	146			(109)	
Bulgaria	77	-	210			(2)	
United Kingdom	-	-	-			-	
Cyprus	145	18	18			(19)	
Other countries	411	239	29			(176)	
Total	47,421	5,307	4,886	42,083	(2,895)	(411)	(32)

Credit Risk

Table 15: EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry

	31 December 2021					
	Gross carrying/nominal amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non- performing exposures
		of which: non-performing		of which loans and advances subject to impairment		
			of which defaulted			
	€ million	€ million	€ million	€ million	€ million	€ million
Agriculture, forestry and fishing	280	20	20	280	(20)	-
Mining and quarrying	29	10	10	29	(7)	-
Manufacturing	2,587	204	204	2,587	(152)	-
Electricity, gas, steam and air conditioning supply	623	-	-	623	(5)	-
Water supply	15	1	1	15	(1)	-
Construction	764	143	143	764	(92)	-
Wholesale and retail trade	3,188	544	544	3,173	(361)	(15)
Transport and storage	2,711	119	119	2,701	(94)	-
Accommodation and food service activities	1,656	268	268	1,656	(83)	-
Information and communication	162	51	51	162	(43)	-
Financial and insurance activities	14	2	2	14	(1)	-
Real estate activities	642	144	144	639	(59)	-
Professional, scientific and technical activities	479	101	101	479	(66)	-
Administrative and support service activities	168	12	12	168	(10)	-
Public administration and defense, compulsory social security	1	-	-	1	-	-
Education	27	6	6	27	(3)	-
Human health services and social work activities	376	11	11	376	(10)	-
Arts, entertainment and recreation	592	15	15	592	(9)	-
Other services	198	38	38	198	(30)	-
Total	**14,512**	**1,689**	**1,689**	**14,484**	**(1,046)**	**(15)**

	31 December 2020					
	Gross carrying/nominal amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non- performing exposures
		of which: non-performing		of which loans and advances subject to impairment		
			of which defaulted			
	€ million	€ million	€ million	€ million	€ million	€ million
Agriculture, forestry and fishing	244	30	28	244	(24)	-
Mining and quarrying	32	9	9	32	(7)	-
Manufacturing	2,714	298	289	2,714	(192)	-
Electricity, gas, steam and air conditioning supply	572	1	1	572	(4)	-
Water supply	16	2	1	16	(1)	-
Construction	780	251	237	780	(132)	-
Wholesale and retail trade	3,561	782	746	3,547	(482)	(14)
Transport and storage	2,129	159	156	2,120	(108)	-
Accommodation and food service activities	1,672	255	245	1,672	(110)	-
Information and communication	186	36	35	186	(38)	-
Financial and insurance activities	13	5	4	13	(3)	-
Real estate activities	612	125	122	591	(39)	(18)
Professional, scientific and technical activities	622	240	223	622	(147)	-
Administrative and support service activities	198	20	19	198	(15)	-
Public administration and defense, compulsory social security	1	-	-	1	-	-
Education	39	14	13	39	(7)	-
Human health services and social work activities	559	26	23	559	(22)	-
Arts, entertainment and recreation	579	16	15	579	(10)	-
Other services	299	78	69	299	(48)	-
Total	14,828	2,347	2,235	14,784	(1,389)	(32)

Credit Risk

The following table provides an overview of the credit quality of loans and advances to non-financial corporations as at 31 December 2021 and 31 December 2020.

Table 16: EU CQ2 - Quality of forbearance

	31 December 2021	31 December 2020
	Gross carrying amount of forborne exposures	Gross carrying amount of forborne exposures
	€ million	€ million
Loans and advances that have been forborne more than twice	620	926
Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	395	330

[(1)] *The decrease in forborne exposures is mainly due to Mexico transaction.*

The following table provides an analysis of collateral valuation and other information on loans and advances as at 31 December 2021 and 31 December 2020.

Table 17: EU CQ6 - Collateral valuation - Loans and advances

	31 December 2021											
	Loans and advances											
		Performing		Non Performing								
					Unlikely to pay that are not past due or past due <=90 days	Past due > 90 days						
			of which past due > 30 days <= 90 days				of which Past due > 90 days <= 180 days	of which Past due > 180 days <= 1 year	of which Past due > 1 year <= 2 years	of which Past due > 2 years <= 5 years	of which Past due > 5 years <= 7 years	of which Past due > 7 years
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Gross carrying amount	**33,587**	**31,158**	**119**	**2,429**	**859**	**1,570**	**110**	**220**	**313**	**652**	**42**	**232**
Of which: secured	26,050	24,246	83	1,804	644	1,160	79	162	231	487	31	171
Of which: secured with immovable property	11,999	10,668	75	1,332	496	835	77	154	176	267	25	136
of which: instruments with LTV higher than 60% and lower or equal to 80%	2,847	2,683		165	83	82						
of which: instruments with LTV higher than 80% and lower or equal to 100%	2,547	2,254		293	142	151						
of which: instruments with LTV higher than 100%	3,563	2,738		825	220	606						
Accumulated impairment for secured assets	**(964)**	**(244)**	**(5)**	**(719)**	**(145)**	**(574)**	**(10)**	**(54)**	**(105)**	**(295)**	**(14)**	**(96)**
Collateral												
of which value capped at the value of exposure	15,358	14,384	72	974	462	511	68	103	115	168	11	45
of which immovable property	10,690	9,810	66	880	401	479	67	101	107	148	11	45
Of which value above the cap	14,631	13,170	73	1,461	613	848						
of which immovable property	8,196	7,417	65	779	272	508						
Financial guarantees received	**4,577**	**4,512**	**2**	**65**	**11**	**55**	**-**	**2**	**3**	**16**	**6**	**28**
Accumulated partial write-off	**(305)**	**-**	**-**	**(305)**	**(37)**	**(268)**	**(1)**	**(1)**	**(59)**	**(107)**	**(4)**	**(95)**

Credit Risk

	31 December 2020											
	Loans and advances											
		Performing		Non Performing								
					Unlikely to pay that are not past due or past due <=90 days	Past due > 90 days						
			of which past due > 30 days <= 90 days				of which Past due > 90 days <= 180 days	of which Past due > 180 days <= 1 year	of which Past due > 1 year <= 2 years	of which Past due > 2 years <= 5 years	of which Past due > 5 years <= 7 years	of which Past due > 7 years
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Gross carrying amount	35,747	30,900	187	4,847	1,190	3,657	134	188	646	825	699	1,165
Of which: secured	26,969	23,336	134	3,633	830	2,803	88	142	487	646	568	872
Of which: secured with immovable property	14,048	11,183	117	2,865	628	2,237	74	113	434	506	496	693
of which: instruments with LTV higher than 60% and lower or equal to 80%	2,815	2,449		366	86	280						
of which: instruments with LTV higher than 80% and lower or equal to 100%	3,507	2,641		866	207	659						
of which: instruments with LTV higher than 100%	5,021	3,388		1,633	335	1,298						
Accumulated impairment for secured assets	(1,691)	(335)	(7)	(1,356)	(241)	(1,115)	(26)	(49)	(198)	(294)	(190)	(358)
Collateral												
of which value capped at the value of exposure	18,740	16,578	116	2,162	568	1,594	61	92	285	336	338	482
of which immovable property	12,186	10,152	104	2,034	511	1,523	54	89	268	327	331	454
Of which value above the cap	13,979	11,939	74	2,040	470	1,570						
of which immovable property	7,988	6,629	72	1,359	334	1,025						
Financial guarantees received	746	669	3	77	6	71	-	-	3	9	31	28
Accumulated partial write-off	(351)	-	-	(351)	-	(351)	(4)	-	(67)	(59)	(72)	(149)

(1) The decrease in non- performing exposures is mainly due to Mexico transaction.

The following table provides an overview of the movements (inflows and outflows) of non-performing loans and advances as at 31 December 2021.

Table 18: EU CR2 - Changes in the stock of non-performing loans and advances

	31 December 2021
	Gross carrying amount € million
Initial stock of non-performing loans and advances	4,848
Inflows to non-performing portfolios	1,648
Outflows from non-performing portfolios	(4,067)
Outflows due to write-offs	(398)
Outflow due to other situations	(3,669)
Final stock of non-performing loans and advances	**2,429**

(1) It represents mainly the outflows of loans derecognized due to securitization and sale transactions.

Table 19: EU CR2a - Changes in the stock of non-performing loans and advances and related net accumulated recoveries

	31 December 2021	
	Gross carrying amount € million	Related net acumulated recoveries € million
Initial stock of non-performing loans and advances	4,848	
Inflows to non performing portfolios	1,648	
Outflows from non performing portfolios	(4,067)	
Outflow to performing portfolio	(483)	
Outflow due to loan repayment, partial or total	(272)	
Outflow due to collateral liquidations	(41)	27
Outflow due to taking possession of collateral	(22)	16
Outflow due to sale of instruments	(42)	42
Outflow due to risk transfers	-	-
Outflows due to write-off	(398)	
Outflow due to Other Situations	(583)	
Outflow due to reclassification as held for sale	(2,226)	
Final stock of non-performing loans and advances	**2,429**	

[(1)] It represents the outflows of loans derecognized due to securitization and sale transactions, that have been reclassified as held for sale during the year.

The following table provides an overview of foreclosed assets obtained from non-performing exposures as at 31 December 2021 and 31 December 2020.

Table 20: EU CQ7 - Collateral obtained by taking possession and execution processes

	31 December 2021		31 December 2020	
	Collateral obtained by taking possession		Collateral obtained by taking possession	
	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million
Property Plant and Equipment (PP&E)	-	-	-	-
Other than Property Plant and Equipment	643	(78)	550	(75)
Residential immovable property	242	(37)	241	(38)
Commercial Immovable property	384	(39)	295	(37)
Movable property (auto, shipping, etc.)	3	(2)	-	-
Equity and debt instruments	13	-	13	-
Other	-	-	-	-
Total	**643**	**(78)**	550	(75)

Credit Risk

The following table provides an overview of collateral obtained by taking possession by type, by time since date of foreclosure as at 31 December 2021 and 31 December 2020.

Table 21: EU CQ8 - Collateral obtained by taking possession and execution processes – Vintage breakdown

31 December 2021

	Debt balance reduction		Total collateral obtained by taking possession									
					Foreclosed <= 2 years		Foreclosed >= 2 years <= 5 years		Foreclosed > 5 years		Of which: Non-current assets held-for-sale	
	Gross carrying amount € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million
Collateral obtained by taking possession classified as Property Plant and Equipment (PP&E)	-	-	-	-								
Collateral obtained by taking possession other than classified Property Plant and Equipment	-	-	643	(78)	146	(11)	310	(18)	187	(49)	-	-
Residential immovable property	-	-	242	(37)	22	(3)	113	(7)	109	(28)	-	-
Commercial Immovable property	-	-	384	(39)	121	(6)	184	(11)	76	(21)	-	-
Movable property (auto, shipping, etc.)	-	-	3	(2)	2	(2)	-	-	-	-	-	-
Equity and debt instruments	-	-	13	-	-	-	12	-	1	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-	-
Total	**-**	**-**	**643**	**(78)**	**146**	**(11)**	**310**	**(18)**	**187**	**(49)**	**-**	**-**

31 December 2020

	Debt balance reduction		Total collateral obtained by taking possession									
					Foreclosed <= 2 years		Foreclosed >= 2 years <= 5 years		Foreclosed > 5 years		Of which: Non-current assets held-for-sale	
	Gross carrying amount € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million
Collateral obtained by taking possession classified as Property Plant and Equipment (PP&E)	-	-	-	-								
Collateral obtained by taking possession other than classified Property Plant and Equipment	-	-	550	(75)	335	(15)	29	(2)	186	(58)	-	-
Residential immovable property	-	-	242	(38)	125	(6)	11	(1)	105	(31)	-	-
Commercial Immovable property	-	-	295	(37)	203	(9)	12	(1)	80	(27)	-	-
Movable property (auto, shipping, etc.)	-	-	-	-	-	-	-	-	-	-	-	-
Equity and debt instruments	-	-	13	-	7	-	6	-	1	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-	-
Total	-	-	550	(75)	335	(15)	29	(2)	186	(58)	-	-

Credit Risk

In April 2020, the EBA published Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis which clarifies a set of criteria and conditions under which such measures do not trigger forbearance classification of loans and advances and sets out their further prudential treatment in this context.

In the last two years, the Bank took all appropriate actions to address liquidity difficulties of businesses and individuals caused by the limited or suspended operations of businesses due to the Covid-19 pandemic. As at 31 December 2021, the Bank's moratoria had expired. As at 31 December 2020, the Bank's EBA compliant moratoria (active and expired) amounted to € 5.7 billion, out of which € 4.1 billion expired and € 1.6 billion were active.

The following table provides an overview of the credit quality of loans and advances subject to moratoria on loan repayments applied in the light of the Covid-19 crisis as at 31 December 2020.

Table 22: Information on loans and advances subject to legislative and non-legislative moratoria

	31 December 2020						
	Gross carrying amount						
		Performing			Non Performing		
			Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days
	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Loans and advances subject to moratorium	5,673	5,167	1,629	2,672	506	470	464
of which: Households	2,916	2,630	980	1,581	286	274	272
of which: Collateralised by residential immovable property	2,244	2,053	755	1,194	191	181	182
of which: Non-financial corporations	2,756	2,536	649	1,092	220	196	192
of which: Small and Medium-sized Enterprises	1,913	1,701	579	991	212	196	187
of which: Collateralised by commercial immovable property	1,402	1,272	371	631	130	122	117

	31 December 2020							
	Accumulated impairment, accumulated negative changes in fair value due to credit risk							Gross carrying amount
		Performing			Non Performing			
			Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days	Inflows to non-performing exposures
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Loans and advances subject to moratorium	(495)	(278)	(172)	(244)	(217)	(206)	(200)	32
of which: Households	(271)	(139)	(90)	(127)	(132)	(128)	(125)	15
of which: Collateralised by residential immovable property	(136)	(73)	(49)	(68)	(63)	(60)	(60)	11
of which: Non-financial corporations	(224)	(139)	(82)	(116)	(85)	(78)	(75)	17
of which: Small and Medium-sized Enterprises	(208)	(123)	(77)	(109)	(85)	(78)	(75)	17
of which: Collateralised by commercial immovable property	(109)	(66)	(40)	(57)	(43)	(41)	(39)	6

Credit Risk

The following table provides an overview of the volume of loans and advances subject to legislative and non-legislative moratoria in accordance with EBA/GL/2020/02 by residual maturity of these moratoria as at 31 December 2021 and 31 December 2020.

Table 23: Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria

	31 December 2021									
	Number of obligors	Gross carrying amount								
			Of which: legislative moratoria	Of which: expired	Residual maturity of moratoria					
					<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year
		€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Loans and advances for which moratorium was offered	**94,216**	**5,051**							
Loans and advances subject to moratorium (granted)	**85,926**	**4,672**	44	4,672	-	-	-	-	-
of which: Households		2,557	10	2,557	-	-	-	-	-
of which: Collateralised by residential immovable property		2,032	10	2,032	-	-	-	-	-
of which: Non-financial corporations		2,109	34	2,109	-	-	-	-	-
of which: Small and Medium-sized Enterprises		1,550	22	1,550	-	-	-	-	-
of which: Collateralised by commercial immovable property		1,245	33	1,245	-	-	-	-	-

	31 December 2020								
	Number of obligors	Gross carrying amount							
			Of which: legislative moratoria	Of which: expired	Residual maturity of moratoria				
					<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year
		€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Loans and advances for which moratorium was offered	94,553	6,205							
Loans and advances subject to moratorium (granted)	86,247	5,674	14	4,069	848	563	112	80	2
of which: Households		2,915	13	2,822	86	-	7	-	-
of which: Collateralised by residential immovable property		2,245	13	2,194	44	-	7	-	-
of which: Non-financial corporations		2,757	1	1,247	760	563	105	80	2
of which: Small and Medium-sized Enterprises		1,913	1	1,191	410	185	103	22	2
of which: Collateralised by commercial immovable property		1,402	-	661	337	268	69	66	1

Credit Risk

The following table provide an overview of the stock of newly originated loans and advances subject to public guarantee schemes introduced in response to Covid-19 crisis as at 31 December 2021 and 31 December 2020.

Table 24: Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to Covid-19 crisis

	31 December 2021			
	Gross carrying amount		Maximum amount of the guarantee that can be considered	Gross carrying amount
		of which: forborne	Public guarantees received	Inflows to non-performing exposures
	€ million	€ million	€ million	€ million
Newly originated loans and advances subject to public guarantee schemes	**1,252**	**-**	**228**	**5**
of which: Households	-			-
of which: Collateralised by residential immovable property	-			-
of which: Non-financial corporations	1,252	-	228	5
of which: Small and Medium-sized Enterprises	785			-
of which: Collateralised by commercial immovable property	28			-

	31 December 2020			
	Gross carrying amount		Maximum amount of the guarantee that can be considered	Gross carrying amount
		of which: forborne	Public guarantees received	Inflows to non-performing exposures
	€ million	€ million	€ million	€ million
Newly originated loans and advances subject to public guarantee schemes	1,098	-	198	-
of which: Households	-			-
of which: Collateralised by residential immovable property	-			-
of which: Non-financial corporations	1,098	-	198	-
of which: Small and Medium-sized Enterprises	664			-
of which: Collateralised by commercial immovable property	1			-

3.4 Standardised approach

The Bank applies the Standardised approach for all subsidiaries exposures and for a part of the Bank's retail loans. Moreover, the Standardised approach is applied for credit exposures with sovereign and institutional counterparties, as well as with corporate bond issuers, for which a permanent exemption has been granted by the BoG.

Credit ratings are retrieved from External Credit Assessment Institutions (ECAIs), such as Moody's or Standard & Poor's or Fitch. In the cases where more than one rating is available, the second better rating is used.

ECAIs are not used for loans' portfolios directly, but only in cases when they are guaranteed by central governments or institutions (risk substitution). In such a case the ECAIs used are the same as the ones described above.

In the case of corporate bond issues, the corresponding issue rating by these agencies is used. In case that an issue rating is not available, rating for other issues by the same issuer can be used, if: (a) the corporate bond under review has equal or better seniority with these rated bonds or (b) the resulting risk weight is lower than the applicable risk weight of unrated bonds.

The table below presents Standardised exposures on two different bases (before CCF and CRM and after CCF and CRM) as at 31 December 2021 and 31 December 2020.

Table 25: EU CR4 – Standardised approach – Credit risk exposure and CRM effects

	31 December 2021					
Exposure classes	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On-balance-sheet exposures € million	Off-balance-sheet exposures € million	On-balance-sheet exposures € million	Off-balance-sheet amount € million	RWEA € million	RWEA density %
Central governments or central banks [3]	18,569	-	22,366	-	4,627	21%
Regional government or local authorities	31	1	29	-	6	21%
Public sector entities	706	-	1,729	-	706	41%
Multilateral development banks	-	-	309	-	-	0%
International organisations [4]	-	-	-	-	-	0%
Institutions [5]	4,298	280	4,310	273	978	21%
Corporates [6]	794	16	794	11	693	86%
Retail	508	252	500	40	397	74%
Secured by mortgages on immovable property	1,800	1	1,800	-	636	35%
Exposures in default	163	2	160	1	165	102%
Exposures associated with particularly high risk	-	-	1	-	-	0%
Covered bonds	57	-	57	-	25	44%
Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0%
Collective investment undertakings	-	-	-	-	-	0%
Equity	69	-	69	-	172	249%
Other items	3,292	-	3,291	-	2,701	82%
TOTAL	**30,287**	**552**	**35,415**	**325**	**11,106**	**31%**

Exposure classes	31 December 2020					
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On Balance sheet amount € million	Off Balance sheet amount € million	On Balance sheet amount € million	Off Balance sheet amount € million	RWEA € million	RWEA density %
Central governments or central banks	12,815	-	13,786	-	4,795	35%
Regional government or local authorities	37	1	34	-	7	21%
Public sector entities	708	-	708	-	708	100%
Multilateral development banks	-	-	153	-	-	0%
International organisations	171	-	171	-	-	0%
Institutions	4,657	284	4,659	305	511	10%
Corporates	516	23	516	12	456	86%
Retail	724	244	716	36	555	74%
Secured by mortgages on immovable property	2,109	1	2,109	-	745	35%
Exposures in default	763	2	760	1	768	101%
Exposures associated with particularly high risk	-	-	-	-	-	0%
Covered bonds	58	-	58	-	26	45%
Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0%
Collective investment undertakings	-	-	-	-	-	0%
Equity	24	-	24	-	60	250%
Other items	2,959	-	2,959	-	2,414	82%
Total	25,541	555	26,653	354	11,045	41%

(1) Exposures with counterparties are not included in the table.

(2) The table above does not include securitisations.

(3) The increase of the exposures in the central government or central banks is mainly due to the increase of customer deposits and the increase of sovereign bonds.

(4) The decrease of the exposures in the international organizations is due to the maturity of EFSF bonds.

(5) The increase of the exposures in the institutions is mainly due to the application of the new regulatory framework (SA-CCR) regarding derivatives exposures that directly incorporates the Initial Margins and the Independent Amounts in the calculation of the CCR exposures, effective as of June 2021.

(6) The increase of the exposures in the corporates is mainly due to increased position in corporate bonds.

3.5 Internal Ratings Based (IRB) approach

The following table presents the main changes in capital requirements of credit risk exposures under the IRB approach from 1 January to 31 December 2021:

Table 26: EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach

	31 December 2021	31 December 2020
	Risk weighted exposure amount € million	Risk weighted exposure amount € million
Risk weighted exposure amount as at 1 January 2021	15,051	15,034
Asset size (+/-)	933	549
Asset quality (+/-)	(1,123)	(3)
Model updates (+/-)	333	36
Methodology and policy (+/-)	(44)	(390)
Acquisitions and disposals (+/-)	(2,188)	-
Foreign exchange movements (+/-)	164	(178)
Other (+/-)	(24)	3
Risk weighted exposure amount as at 31 December 2021	**13,102**	15,051

Asset size: *Under this item the changes in RWAs due to the changes in EAD are reported. These changes can be due to new originations or repayments of the loans.*

Asset quality: *The changes to the RWAs due to the borrower risk (i.e. rating grade migration) are reported under this item.*

Model updates: *The changes to the RWAs due to updates in risk parameters following the annual validation process or regulatory reviews.*

Methodology and policy: *Under this item, the changes in RWAs due to regulatory framework changes are presented.*

Foreign exchange movements: *The changes to the RWAs due to the foreign currency translation movements are reported.*

Other*: Under this item the changes in RWAs due to other factors that are used in the calculation of RWAs are reported. These, for example, include changes in total sales of the corporate borrowers and maturity of exposures.*

In 2021, RWAs show a total reduction of € 1,950 million mainly due to derecognition of loans under the Mexico securitization and Wave synthetic securitization with a total impact of - € 2,188 million. The asset quality improvement, affected also by the real estate prices increase, resulted in further decrease of the RWAs by - € 1,123 million which was counterbalanced by the increase of asset size due to new production (+ € 933 million RWAs) and the implementation of new models in IRB portfolio (+ € 333 million).

The table below presents the specialised lending credit exposures (shipping, real estate and project finance) broken down by supervisory risk categories and remaining maturities as at 31 December 2021 and at 31 December 2020:

Table 27: EU CR10 – Specialised lending and equity exposures under the simple risk weighted approach

		31 December 2021					
		Specialised lending : Project finance (Slotting approach)					
Regulatory categories	Remaining maturity	On-balancesheet amount € million	Off-balancesheet amount € million	Risk weight	Exposure value € million	Risk weighted exposure amount € million	Expected loss amount € million
Strong	Less than 2.5 years	12	15	50%	27	14	-
	Equal to or more than 2.5 years	420	213	70%	558	390	2
Good	Less than 2.5 years	-	-	70%	-	-	-
	Equal to or more than 2.5 years	441	57	90%	470	423	4
Satisfactory	Less than 2.5 years	-	-	115%	-	-	-
	Equal to or more than 2.5 years	61	-	115%	61	70	2
Weak	Less than 2.5 years	-	-	250%	-	-	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Default	Less than 2.5 years	5	-	-	5	-	3
	Equal to or more than 2.5 years	-	-	-	-	-	-
Total	**Less than 2.5 years**	**17**	**15**		**32**	**14**	**3**
	Equal to or more than 2.5 years	**922**	**270**		**1,089**	**883**	**8**

		31 December 2021					
		Specialised lending : Income-producing real estate and high volatility commercial real estate (Slotting approach)					
Regulatory categories	Remaining maturity	On-balancesheet amount € million	Off-balancesheet amount € million	Risk weight	Exposure value € million	Risk weighted exposure amount € million	Expected loss amount € million
Strong	Less than 2.5 years	1	-	50%	1	1	-
	Equal to or more than 2.5 years	62	48	70%	106	74	-
Good	Less than 2.5 years	83	6	70%	88	62	-
	Equal to or more than 2.5 years	172	118	90%	235	211	2
Satisfactory	Less than 2.5 years	23	-	115%	23	26	1
	Equal to or more than 2.5 years	60	3	115%	63	72	2
Weak	Less than 2.5 years	-	-	250%	-	1	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Default	Less than 2.5 years	53	-	-	53	-	26
	Equal to or more than 2.5 years	74	21	-	84	-	42
Total	**Less than 2.5 years**	**160**	**6**		**165**	**90**	**27**
	Equal to or more than 2.5 years	**368**	**190**		**488**	**357**	**46**

Credit Risk

Regulatory categories	Remaining maturity	On-balancesheet amount € million	Off-balancesheet amount € million	Risk weight	Exposure value € million	Risk weighted exposure amount € million	Expected loss amount € million
		31 December 2021 – Specialised lending : Object finance (Slotting approach)					
Strong	Less than 2.5 years	172	1	50%	172	86	-
	Equal to or more than 2.5 years	1,005	144	70%	1,092	764	4
Good	Less than 2.5 years	150	-	70%	150	105	1
	Equal to or more than 2.5 years	780	19	90%	789	710	6
Satisfactory	Less than 2.5 years	4	-	115%	4	4	-
	Equal to or more than 2.5 years	13	-	115%	13	14	-
Weak	Less than 2.5 years	-	-	250%	-	-	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Default	Less than 2.5 years	73	-	-	73	-	37
	Equal to or more than 2.5 years	-	-	-	-	-	-
Total	**Less than 2.5 years**	**399**	**1**		**399**	**195**	**38**
	Equal to or more than 2.5 years	**1,798**	**163**		**1,894**	**1,488**	**10**

Regulatory categories	Remaining maturity	On-balancesheet amount € million	Off-balancesheet amount € million	Risk weight	Exposure value € million	Risk weighted exposure amount € million	Expected loss amount € million
		31 December 2020 – Specialised lending : Project finance (Slotting approach)					
Strong	Less than 2.5 years	4	3	50%	5	3	-
	Equal to or more than 2.5 years	529	64	70%	587	411	2
Good	Less than 2.5 years	62	-	70%	62	43	-
	Equal to or more than 2.5 years	111	-	90%	111	100	1
Satisfactory	Less than 2.5 years	-	-	115%	-	-	-
	Equal to or more than 2.5 years	55	-	115%	55	63	2
Weak	Less than 2.5 years	-	-	250%	-	-	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Default	Less than 2.5 years	6	-	-	6	-	3
	Equal to or more than 2.5 years	-	-	-	-	-	-
Total	Less than 2.5 years	72	3		73	46	3
	Equal to or more than 2.5 years	695	64		753	574	5

Regulatory categories	Remaining maturity	On-balancesheet amount € million	Off-balancesheet amount € million	Risk weight	Exposure value € million	Risk weighted exposure amount € million	Expected loss amount € million
		31 December 2020 – Specialised lending : Income-producing real estate and high volatility commercial real estate (Slotting approach)					
Strong	Less than 2.5 years	-	-	50%	-	-	-
	Equal to or more than 2.5 years	27	43	70%	70	49	-
Good	Less than 2.5 years	14	5	70%	19	13	-
	Equal to or more than 2.5 years	201	52	90%	232	208	2
Satisfactory	Less than 2.5 years	65	-	115%	65	75	2
	Equal to or more than 2.5 years	18	4	115%	20	24	1
Weak	Less than 2.5 years	-	-	250%	-	-	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Default	Less than 2.5 years	38	-	-	38	-	19
	Equal to or more than 2.5 years	28	1	-	29	-	14
Total	Less than 2.5 years	117	5		122	88	21
	Equal to or more than 2.5 years	274	100		351	281	17

		31 December 2020					
		Specialised lending : Object finance (Slotting approach)					
Regulatory categories	Remaining maturity	On-balancesheet amount € million	Off-balancesheet amount € million	Risk weight	Exposure value € million	Risk weighted exposure amount € million	Expected loss amount € million
Strong	Less than 2.5 years	71	1	50%	71	36	-
	Equal to or more than 2.5 years	621	53	70%	661	463	3
Good	Less than 2.5 years	133	-	70%	133	93	1
	Equal to or more than 2.5 years	614	26	90%	634	570	5
Satisfactory	Less than 2.5 years	19	-	115%	19	22	1
	Equal to or more than 2.5 years	63	-	115%	63	72	2
Weak	Less than 2.5 years	-	-	250%	-	-	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Default	Less than 2.5 years	74	-	-	74	-	37
	Equal to or more than 2.5 years	4	-	-	4	-	2
Total	Less than 2.5 years	297	1		297	151	39
	Equal to or more than 2.5 years	1,302	79		1,362	1,105	12

The following table presents the equity exposures, broken down by risk weights as at 31 December 2021 and 31 December 2020.

Table 28: EU CR10 – Equity Exposures under the simple risk weighted approach

	31 December 2021					
	Equities under the simple risk-weighted approach					
Categories	On-balancesheet exposure € million	Off-balancesheet exposure € million	Risk weight	Exposure value € million	Risk weighted exposure amount € million	Expected loss amount € million
Private equity exposures	2,050	-	190%	2,050	3,894	16
Exchange-traded equity exposures	30	-	290%	30	87	0.2
Other equity exposures	9	-	370%	9	34	0.2
Total	**2,089**	**-**		**2,089**	**4,015**	**16**

	31 December 2020					
	Equities under the simple risk-weighted approach					
Categories	On-balancesheet exposure € million	Off-balancesheet exposure € million	Risk weight	Exposure value € million	Risk weighted exposure amount € million	Expected loss amount € million
Private equity exposures	2,042	-	190%	2,042	3,879	16
Exchange-traded equity exposures	24	-	290%	24	70	-
Other equity exposures	21	-	370%	21	78	1
Total	2,087	-		2,087	4,027	17

3.6 Credit risk mitigation

A key component of the Bank's business strategy is to reduce risk by utilizing various risk mitigating techniques. The most important risk mitigating means are collaterals' pledges, guarantees and netting arrangements in master agreements for derivatives.

3.6.1 Types of collateral commonly accepted by the Bank

The following collateral types are accepted according to the Bank's internal policies:

- Residential real estate (e.g., houses, apartments, vacation homes etc.);
- Commercial real estate (e.g., office buildings, shopping centers, shops, logistics centers, etc.);
- Land (e.g., urban, agricultural, other);
- Receivables (trade debtors) and post-dated cheques;
- Financial collateral, listed shares, listed bonds and other specific securities accepted;
- Deposits;
- Guarantees and letters of support;
- Insurance contracts; and
- Machinery and equipment, vehicles and vessels.

A specific coverage ratio is pre-requisite upon approval and on ongoing basis for each collateral type, specified in the credit policy manual.

For Treasury exposures (i.e. repos, reverse repos, derivatives, etc.) the Group accepts only cash or liquid bonds as collaterals.

3.6.2 Valuation principles of collateral

In the context of supervisory guidelines and in order to manage effectively the real estate portfolio that has been accepted as collateral, the Bank has issued the Collaterals and Valuation Policy which is approved by the Board Risk Committee (BRC) and details – among other things - the type of initial valuation and the frequency of revaluation for the assessment of the commercial value of real estate collaterals.

All valuations (including revaluations) should be performed by independent qualified appraisers (individuals or legal entities or employees of legal entities), who possess the necessary qualifications, ability and experience to execute a valuation. In all cases, the Bank must be the ordering party. Otherwise, the Bank needs to obtain a "duty of care" statement from the valuator.

Immovable property collateral should be valued, in full adherence to European and international standards and specifically the European Valuation Standards EVS (Blue Book) and the Royal Institute of Chartered Surveyors (RICS).

The Bank has an approved list of independent and qualified appraisers which can perform valuations. The approved list of appraisers is updated on an annual basis or at shorter intervals if necessary.

All immovable properties should be valued on the basis of market value. Market value is the estimated amount for which an asset or liability should be exchanged on the valuation date between a willing buyer and a willing seller in an arm's length transaction after proper marketing and where the parties had each acted knowledgeably, prudently and without compulsion.

After two sequential individual valuations (as those are defined below) of the same immovable property, the appraiser should rotate (either to a different independent valuator or to a different independent appraisal provider).

Regarding prenotated/ mortgaged real estate properties that are located outside Greece, the following apply:

- If the property is located in a country where the Bank has a subsidiary, the valuation is performed by the locally approved appraisers;
- If the property is located in a country where there is no subsidiary, the valuation is requested from a certified First-Class appraiser in that country;
- For all properties located outside Greece, the same rules of valuation/revaluation as in Greece apply (e.g. loan balance, frequency of valuation, revaluation etc.).

On exceptional cases, in corporate banking, it is permitted to use an appraiser not included in the approved list. Such exceptions must be approved by the competent Approval Level and should refer:

- Syndicated Loans where Bank is not the arranger;
- Highly specialized cases, which they cannot be performed by any of the approved valuators;
- Borrowers propose for specific and substantiated reasons the use of an appraiser not included in the approved list, given the fact that objectivity and independency standards are met.

The initial valuation of real estate assets for the purposes of granting a new credit facility or refinancing existing credit facilities, is being conducted in all cases through the property's physical inspection undertaken by the appraisers.

The major acceptable categories of real estate that can be used as collateral by the Bank are:

- Residential Real Estates (e.g., houses, apartments, vacation homes, urban plots with residential use etc.);
- Commercial Real Estates (e.g., office buildings, shopping centers, shops, logistics centers, industrial structures, factories, hotels, camping sites, theaters, educational facilities, hospitals, land with agricultural use, warehouses, etc.).

For every Real Estate that will be used as collateral, prior to initial disbursement it has to be appropriately verified that the said property is in legal and technical order (also referred as legal and technical compliance).

There are two major types of property valuation: individual and indexed.

Individual Valuations

Individual property valuations (including revaluations) are defined as property-specific appraisals, which are performed by an appraiser on a specific property basis and are not based on indexation or any other automated process. There are two methods of individual valuations: through physical inspection & desktop.

Valuation with Physical Inspection

In order to conduct a property valuation with physical inspection, all supporting documentation, should be collected (such as property title, topographical plan, floor plans). The valuation is carried out with external and/or internal inspection of the property. The Current Market Value and the Final Market Value are estimated. In the case of completed properties these two values are equal, while for cases of unfinished buildings they are different (in these cases collateral coverage is calculated using the Current Market Value).

If during the inspection it is identified that the property has undergone changes (alterations) regarding its surface (without changes in the perimeter or changes that do not affect the existing horizontal properties), the property has to be appraised after the submission of required / mandatory documents.

For every new loan origination, a physical inspection must be performed.

In cases regarding financing of building under construction with gradual disbursements, an evaluation with physical inspection should precede each disbursement to confirm the current stage of completion.

Desktop Valuation

This method is used to update an existing valuation (revaluation), is carried out without physical property inspection but it is conducted on the specific property basis and is not based on indexation or any other automated process. It is noted that for this method to be considered eligible, it is a prerequisite that the initial valuation of the property was performed via the physical inspection method. Both physical inspection and desktop valuations are performed by appraisers from the approved list.

Valuations derived from indexation or any other automated processes are defined as indexed valuations.

Index for Residential Real Estate

Eurobank, in cooperation with the National Bank of Greece and Alpha Bank S.A. provided data for the development of a statistical index, the PropIndex, which is used to revalue residential real estate properties over the loan's lifetime. The methodology and development of PropIndex have been prepared by a company specialized in the statistical field and the index has been approved by the Bank of Greece. It is now considered as a tool used to monitor probable changes in the values of residential real estate properties but also for analyzing current market's trend. This index is updated on an annual basis.

Index for Commercial Real Estate

For commercial real estate valuations, Eurobank uses the CRE Index. This index is derived through a combination of CPS & BoG CRE indices and is provided annually by CPS. The index constitutes a tool for the statistical monitoring of changes of the values of commercial real estate property collaterals.

In case of significant Real Estate market changes, indexed valuations may be used more often than annually in order respective market changes to be incorporated in collaterals' market values.

The following table summarizes the revaluation policy for the Retail lending portfolios.

<table>
<tr><th colspan="4">Immovable Assets</th></tr>
<tr><th>EBA Status</th><th colspan="3">Type & Frequency</th></tr>
<tr><td rowspan="3">Performing
(PE, PF & CPF)</td><td colspan="3">Loan Exposure (in € '000)</td></tr>
<tr><td><= 300</td><td>> 300 & <=1,000</td><td>> 1,000</td></tr>
<tr><td>Index, Annually.</td><td>Index, Annually.</td><td>Physical inspection, Annually.</td></tr>
<tr><td rowspan="3">Performing → Non-Performing
(including denounced)</td><td colspan="3">Loan Exposure (in € '000)</td></tr>
<tr><td><=300</td><td>> 300 & <= 1,000</td><td>> 1,000</td></tr>
<tr><td>Index</td><td>Desktop valuation is required to take place within max three (3) months from reclassification unless a valuation has taken place during the last 6 months.</td><td>Physical inspection valuation is required to take place within max three (3) months from reclassification unless a valuation has taken place during the last 6 months.</td></tr>
<tr><td rowspan="3">Non-Performing
(NPE & NPF)</td><td colspan="3">Loan Exposure (in € '000)</td></tr>
<tr><td><= 300</td><td>>300 & <= 1,000</td><td>> 1,000</td></tr>
<tr><td>Index, Annually.</td><td>Desktop, Annually and for as long as the exposure is classified as non-performing.</td><td>Physical inspection, Annually.</td></tr>
</table>

Special types of immovable assets (hotels, shopping centers, medical diagnostic centers, fitness/beauty centers, legally permissible building height) should be revaluated through Desktop annually and every two years with Physical Inspection with the exception of legally permissible building height which should be revaluated through Index annually and every three years with Physical Inspection.

The following table summarizes the revaluation policy for the Wholesale lending portfolios.

EBA Status	Immovable Assets				
Performing (PE, PF & CPF)	Loan Exposure (in € '000)				
	<= 300	> 300 & <= 1.000		> 1.000	
	All types	Residential Real Estate	Commercial Real Estate	Residential Real Estate	Commercial Real Estate
	• Every year with Index • For special types[1] with Desktop annually	• Physical inspection every 3 years • In-between years with Index	• Physical inspection every 2 years • In-between years Index or desktop for special types [1]	• Physical inspection every 3 years • In-between years with desktop	• Physical inspection every 2 years • In-between years with desktop
Performing → Non-Performing (including denounced)	Loan Exposure (in € '000) - All types of Immovable Assets				
	<= 300	>300 & <= 1,000		> 1,000	
	Index. For special types[1] a Desktop valuation is required to take place within max (3) three months from reclassification unless a valuation has taken place during the last 6 months	Desktop valuation is required to take place within max (3) three months from reclassification unless a valuation has taken place during the last 6 months.		Physical inspection valuation is required to take place within max three (3) months from reclassification unless a valuation has taken place during the last 6 months.	
Non-Performing	Loan Exposure (in € '000) - All types of Immovable Assets				
	<= 300			> 300	
	• Every year with Index • For special types (1) with Desktop annually			• Physical inspection every 2 years. • In-between years Desktop	

[1] Special Types: Hotels, shopping centers, medical diagnostic centers, fitness/beauty centers, legally permissible building height

Other collaterals

To ensure the quality of post-dated cheques accepted as collateral, the Bank has developed a pre-screening system, which takes into account a number of criteria and risk parameters, so as to evaluate their eligibility. Furthermore, the post-dated cheques' valuation is monitored weekly through the use of advanced statistical reports and monthly through detailed information regarding recoverability of cheques, referrals and bounced cheques, per issuer broken down by business unit (corporate and small business banking).

In case of reverse repos, the bonds received as collateral are evaluated on a daily basis by the official valuation system. All these are monitored via credit exposure measurement system that takes into account the specific characteristics of every contract.

3.6.3 Guarantees and credit derivatives

The guarantees used as credit risk mitigation by the Bank are largely issued by central and regional governments in the countries in which it operates. The Public Fund for very small businesses (ETEAN) and similar funds, banks and insurance companies are also important guarantors of credit risk.

The Bank enters into credit derivative transactions with both retail and investment banks. The lowest counterparty rating is A, whereas the average counterparty rating is AA (Standard & Poor's rating scale).

Credit Risk

Only eligible providers of guarantees and credit derivatives can be recognised in the Standardised and Foundation IRB (F-IRB) approach for credit risk. All central governments, regional governments and institutions are eligible. Guarantees issued by corporate entities can only be taken into account if their rating corresponds to A- (Standard & Poor's rating scale) or better.

The table below shows the impact of the credit derivatives used as mitigation techniques in RWAs as at 31 December 2021 and 31 December 2020.

Table 29: EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques

	31 December 2021		31 December 2020	
	Pre-credit derivatives risk weighted exposure amount € million	Actual risk weighted exposure amount € million	Pre-credit derivatives risk weighted exposure amount € million	Actual risk weighted exposure amount € million
Exposures under FIRB	8,514	8,514	9,087	9,087
Central governments and central banks	-	-	-	-
Institutions	-	-	-	-
Corporates	8,514	8,514	9,087	9,087
of which Corporates - SMEs	2,013	2,013	2,293	2,293
of which Corporates - Specialised lending	2,879	2,879	2,121	2,121
Exposures under AIRB	4,588	4,588	5,964	5,964
Central governments and central banks	-	-	-	-
Institutions	-	-	-	-
Corporates	132	132	147	147
of which Corporates - SMEs	132	132	147	147
of which Corporates - Specialised lending	-	-		
Retail	4,456	4,456	5,817	5,817
of which Retail – SMEs - Secured by immovable property collateral	397	397	703	703
of which Retail – non-SMEs - Secured by immovable property collateral	2,396	2,396	3,537	3,537
of which Retail – Qualifying revolving	617	617	457	457
of which Retail – SMEs - Other	368	368	470	470
of which Retail – Non-SMEs- Other	679	679	650	650
TOTAL (including FIRB exposures and AIRB exposures)	**13,102**	**13,102**	15,051	15,051

[1] *Securitisation positions are not included in the above table.*

Credit Risk

Table 30: EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques

A-IRB 31 December 2021	Total exposures	Credit risk Mitigation techniques – Funded credit Protection (FCP): Part of exposures covered by Financial Collaterals	Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Immovable property Collaterals	Part of exposures covered by Receivables	Part of exposures covered by Other physical collateral	Part of exposures covered by Other funded credit protection (%)	Part of exposures covered by Cash on deposit	Part of exposures covered by Life insurance policies	Part of exposures covered by Instruments held by a third party	Unfunded credit Protection (UFCP): Part of exposures covered by Guarantees	Part of exposures covered by Credit Derivatives	Credit risk Mitigation methods in the calculation of RWEAs: RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and sustitution effects)
	€ million	%	%	%	%	%	%	%	%	%	%	%	€ million	€ million
Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Corporates	216	13.2%	51.9%	49.4%	2.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	191	132
Of which Corporates – SMEs	216	13.2%	51.9%	49.4%	2.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	191	132
Of which Corporates – Specialised lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Of which Corporates – Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Retail	11,111	2.9%	63.4%	63.1%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4,731	4,456
Of which Retail – Immovable property SMEs	1,435	0.6%	88.7%	88.6%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	421	397
Of which Retail – Immovable property non-SMEs	5,752	0.3%	91.3%	91.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2,396	2,396
Of which Retail – Qualifying revolving	1,787	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	617	617
Of which Retail – Other SMEs	893	25.3%	3.3%	0.0%	3.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	617	368
Of which Retail – Other non-SMEs	1,244	5.6%	39.5%	39.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	679	679
Total	**11,327**	**3.1%**	**63.2%**	**62.8%**	**0.3%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**4,922**	**4,588**

F-IRB 31 December 2021	Total exposures	Credit risk Mitigation techniques – Funded credit Protection (FCP): Part of exposures covered by Financial Collaterals	Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Immovable property Collaterals	Part of exposures covered by Receivables	Part of exposures covered by Other physical collateral	Part of exposures covered by Other funded credit protection (%)	Part of exposures covered by Cash on deposit	Part of exposures covered by Life insurance policies	Part of exposures covered by Instruments held by a third party	Unfunded credit Protection (UFCP): Part of exposures covered by Guarantees	Part of exposures covered by Credit Derivatives	Credit risk Mitigation methods in the calculation of RWEAs: RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and sustitution effects)
	€ million	%	%	%	%	%	%	%	%	%	%	%	€ million	€ million
Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Corporates	13,206	10.8%	56.5%	46.8%	6.1%	3.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	9,042	8,514
Of which Corporates – SMEs	3,164	4.7%	45.2%	36.5%	5.6%	3.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2,295	2,013
Of which Corporates – Specialised lending	3,899	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2,879	2,879
Of which Corporates – Other	6,143	6.1%	11.4%	10.2%	0.5%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3,868	3,622
Total	**13,206**	**4.0%**	**16.1%**	**13.5%**	**1.6%**	**1.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**9,042**	**8,514**

3.6.4 Analysis of collaterals

The following table presents the volume of unsecured and secured exposures including all collateral, financial guarantees and credit derivatives used as credit risk mitigants and are eligible under the respective regulatory approach as at 31 December 2021 and at 31 December 2020.

Table 31: EU CR3 – CRM techniques – Overview: Disclosure of the use of credit risk mitigation techniques

	31 December 2021				
	Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
	€ million	€ million	€ million	€ million	€ million
Loans and advances	21,700	19,935	15,358	4,577	-
Debt securities	8,885	-	-	-	-
Total	**30,585**	**19,935**	**15,358**	**4,577**	**-**
Of which non-performing exposures	1,390	1,039	974	65	-
Of which defaulted	1,390	1,039	974	65	-

	31 December 2020				
	Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
	€ million	€ million	€ million	€ million	€ million
Loans and advances	19,727	19,486	18,739	746	-
Debt securities	6,389	-	-	-	-
Total	26,116	19,486	18,739	746	-
Of which non-performing exposures	2,609	2,239	2,161	78	-
Of which defaulted	2,448	1,980	1,903	78	-

Note:

- *The increase in debt securities is mainly due to increased position in Sovereign Bonds.*
- *The value of collaterals and the amount of financial guarantees shown above are the allocated values after regulatory haircuts.*
- *For real estate properties the lower between the market value and the pledged amount is considered.*

4. Market Risk

The Bank takes on exposure to market risk, which is the risk of potential financial loss due to an adverse change in market variables. Changes in interest rates, credit spreads, foreign exchange rates, equity prices and other relevant factors, such as the implied volatilities of the above, can affect the Bank's income or the fair value of its financial instruments.

Table 32: EU MR2-B – RWA flow of market risk exposures under IMA

	31 December 2021						
	VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
	€ million	€ million	€ million	€ million	€ million	€ million	€ million
RWAs at 1 January 2021 [1]	127	395	35	-	-	558	45
Regulatory adjustment [2]	(102)	(265)	(5)	-	-	(372)	(30)
RWAs at the previous quarter-end (end of the day) [3]	25	130	30	-	-	185	15
Movement in risk levels	(30)	(1)	94	-	-	63	5
Model updates/changes	-	-	-	-	-	-	-
Methodology and policy	-	-	-	-	-	-	-
Acquisitions and disposals	-	-	-	-	-	-	-
Foreign exchange movements	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-
RWAs at the end of the reporting period (end of the day) [3]	24	72	129	-	-	225	18
Regulatory adjustment[2]	73	322	-	-	-	395	32
RWAs at 31 December 2021 [1]	**97**	**394**	**129**	**-**	**-**	**620**	**50**

	31 December 2020						
	VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
	€ million	€ million	€ million	€ million	€ million	€ million	€ million
RWAs at 20 March 2020 [1]	255	467	133	-	-	854	68
Regulatory adjustment [2]	(197)	(339)	-	-	-	(536)	(43)
RWAs at the previous quarter-end (end of the day) [3]	58	128	133	-	-	319	25
Movement in risk levels	(128)	(72)	(98)	-	-	(296)	(23)
Model updates/changes	-	-	-	-	-	-	-
Methodology and policy	-	-	-	-	-	-	-
Acquisitions and disposals	-	-	-	-	-	-	-
Foreign exchange movements	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-
RWAs at the end of the reporting period (end of the day) [3]	25	130	30	-	-	185	15
Regulatory adjustment [2]	102	265	5	-	-	372	30
RWAs at 31 December 2020 [1]	127	395	35	-	-	558	45

(1) RWA at previous and current reporting period (quarter end).
(2) Regulatory Adjustment indicates the difference between RWA and RWA (end of day) at previous and current reporting period.
(3) RWA that would be estimated on the basis of the previous or current quarter end figure (instead of the max of it and the 60-day average).

5. Counterparty Risk

5.1 Definition

Counterparty risk is the risk that a counterparty in an off-balance sheet transaction (i.e. derivative transaction) defaults prior to maturity and the Bank has a claim over the counterparty (the market value of the contract is positive for the Bank).

5.2 Mitigation of counterparty risk

To reduce the exposure towards single counterparties, risk mitigation techniques are used. The most common is the use of closeout netting agreements (usually based on standardised ISDA contracts), which allow the bank to net positive and negative replacement values in the event of default of the counterparty.

Furthermore, the Bank also applies margin agreements (CSAs) in case of counterparties. Thus, collateral is paid or received on a daily basis to cover current exposure. In case of repos and reverse repos the Bank applies netting and daily margining using standardised GMRA contracts.

5.3 RWA flow statements of CCR exposures under IMM

Table 33: EU CCR7 – RWA flow statements of CCR exposures under the IMM is not included as the Bank does not use an internal model for the calculation of the RWAs of CCR exposures.

6. Leverage Ratio

The new regulatory framework has introduced the leverage ratio as a non-risk based measure which is intended to restrict the build-up of excessive leverage from on and off balance sheet items in the banking sector.

The leverage ratio is defined as Tier 1 capital divided by the total exposure measure.

The bank submits to the regulatory authorities the leverage ratio on quarterly basis and monitors the level and the factors that affect the ratio.

The level of the leverage ratio with reference date 31.12.2021 on individual basis, including profits, was at 7.47% (31 December 2020: 7.92%), according to the transitional definition of Tier 1 capital, significantly over the 3% minimum threshold and the overall leverage ratio requirement of 3.10% applied by the competent authorities.

In the table below, the detailed disclosures on the Bank's leverage ratio are presented with reference date 31 December 2021 and 31 December 2020.

Table 34: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

	31 December 2021 (1)	31 December 2021	31 December 2020 (1)	31 December 2020
	€ million	€ million	€ million	€ million
Total assets as per published financial statements	61,604	61,604	55,636	55,636
Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-	-	-	-
(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-	-	-	-
(Adjustment for temporary exemption of exposures to central bank (if applicable))	(8,029)	(8,029)	(3,448)	(3,448)
(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR	-	-	-	-
Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-	-	-	-
Adjustment for eligible cash pooling transactions	-	-	-	-
Adjustments for derivative financial instruments	759	759	(395)	(395)
Adjustment for securities financing transactions (SFTs)	780	780	649	649
Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	2,302	2,302	2,153	2,153
(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-	-	-	-
(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-	-	-
(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-	-	-	-
Other adjustments	(2,565)	(2,612)	(1,005)	(1,006)
Total exposure measure	**54,851**	**54,804**	53,590	53,589

(1) Including profits € 469 million for year ended 31 December 2021 and €15 million for year ended 31 December 2020.

Leverage Ratio

Table 35: EU LR2 - LRCom: Leverage ratio common disclosure

	31 December 2021 (1) CRR leverage ratio exposures € million	31 December 2021 CRR leverage ratio exposures € million	31 December 2020 (1) CRR leverage ratio exposures € million	31 December 2020 CRR leverage ratio exposures € million
On - balance sheet exposures (excluding derivatives and SFT's)				
On-balance sheet items (excluding derivatives, SFTs, but including collateral) [1]	51,305	51,305	48,812	48,810
Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-	-	-
(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(1,612)	(1,612)	-	-
Adjustment for securities received under securities financing transactions that are recognised as an asset	-	-	-	-
(General credit risk adjustments to on-balance sheet items)	-	-	-	-
(Asset amounts deducted in determining Tier 1 capital)	(672)	(719)	(234)	(234)
Total on-balance sheet exposures (excluding derivatives and SFTs)	**49,021**	**48,974**	48,578	48,576
Derivative exposures				
Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin) [2]	2,221	2,221	1,877	1,877
Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-	-	-
Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions [2]	497	497	333	333
Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-	-	-
Exposure determined under Original Exposure Method	-	-	-	-
(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-	-	-
(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-	-	-
(Exempted CCP leg of client-cleared trade exposures) (original Exposure Method)	-	-	-	-
Adjusted effective notional amount of written credit derivatives	-	-	-	-
(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-	-	-
Total derivatives exposures	**2,718**	**2,718**	2,210	2,210
Securities financing transaction exposures				
Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	622	622	-	-
(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-	-	-
Counterparty credit risk exposure for SFT assets	189	189	649	649
Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-	-	-
Agent transaction exposures	-	-	-	-
(Exempted CCP leg of client-cleared SFT exposure)	-	-	-	-
Total securities financing transaction exposures	**811**	**811**	649	649
Other off-balance sheet exposures				
Off-balance sheet exposures of gross notional amount	5,516	5,516	4,548	4,548
(Adjustments for conversion to credit equivalent amounts)	(3,214)	(3,214)	(2,394)	(2,394)
(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-	-	-
Off-balance sheet exposures	**2,302**	**2,302**	2,153	2,153
Excluded exposures				
(Total exempted exposures)	-	-	-	-
Capital and total exposure measure	-	-	-	-
Tier 1 capital	4,096	3,580	4,245	4,229
Total exposure measure	54,851	54,804	53,590	53,589
Leverage ratio				
Leverage ratio	**7.47%**	**6.53%**	7.92%	7.89%
Leverage ratio excluding the impact of the exemption of public sector investments and promotional loans) (%)	**7.47%**	**6.53%**	7.92%	7.89%
Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	**6.51%**	**5.70%**	7.44%	7.41%
Regulatory minimum leverage ratio requirement (%)	**3.10%**	**3.10%**	3.10%	3.10%
Additional own funds requirements to address the risk of excessive leverage (%)	**0.00%**	**0.00%**	0.00%	0.00%
of which: to be made up of CET1 capital (percentage points)	**0.00%**	**0.00%**	0.00%	0.00%
Leverage ratio buffer requirement (%)	**0.00%**	**0.00%**	0.00%	0.00%
Overall leverage ratio requirement (%)	**3.10%**	**3.10%**	3.10%	3.10%
Choise on transitional arrangements and relevant exposures				
Choice on transitional arrangements for the definition of capital measure	**Transitional**	**Transitional**	Transitional	Transitional
Disclosure of mean values				
Mean value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	494	494		
Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	622	622		
Total exposure measures (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	54,723	54,677		
Total exposure measures (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	62,753	62,706		
Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7.48%	6.55%		
Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	6.53%	5.71%		

(1) Including profits € 469 million for year ended 31 December 2021 and €15 million for year ended 31 December 2020.

(2) On-balance sheet items are reported net of the exempted exposures to Central Banks.

(3) Total off-balance sheet items exposures presented in accordance with Article 111 (1) of Regulation (EU) No 575/2013 (standardised approach).

Table 36: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

	31 December 2021 [1]	31 December 2021	31 December 2020 [1]	31 December 2020
	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million
Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	49,693	49,693	48,811	48,810
Trading book exposures	-	-	-	-
Banking book exposures, of which:	49,693	49,693	48,811	48,810
Covered bonds	57	57	58	58
Exposures treated as sovereigns	16,819	16,819	11,409	11,408
Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	-	-	-	-
Institutions	2,698	2,698	4,659	4,659
Secured by mortgages of immovable properties	8,274	8,274	9,006	9,006
Retail exposures	2,913	2,913	3,175	3,175
Corporates	10,788	10,788	9,779	9,779
Exposures in default	1,124	1,124	2,108	2,108
Other exposures (eg equity, securitisations, and other non-credit obligation assets)	7,020	7,020	8,617	8,617

[1] Including profits € 469 million for year ended 31 December 2021 and €15 million for year ended 31 December 2020.

7. Liquidity Risk

The Bank is exposed on a daily basis to events that affect the level of its available cash resources due to deposits withdrawals, maturity of medium or long term notes and maturity of secured or unsecured funding (interbank repos and money market takings), loan draw-downs and forfeiture of guarantees. Furthermore, margin calls on secured funding transactions (with ECB and the market) and on risk mitigation contracts (CSAs, GMRAs) result in liquidity exposure. The Bank maintains cash resources to meet all of these needs. The Board Risk Committee (BRC) sets liquidity limits to ensure that sufficient funds are available to meet such contingencies.

Past experience shows that liquidity requirements to support calls under guarantees and standby letters of credit are considerably less than the amount of the commitment. This is also the case with credit commitments where the outstanding contractual amount to extend credit does not necessarily represent future cash requirements, as many of these commitments will expire or terminate without being funded.

The matching and controlled mismatching of the maturities and interest rates of assets and liabilities is fundamental to the management of the Bank. It is unusual for banks to be completely matched, as transacted business is often of uncertain term and of different types. An unmatched position potentially enhances profitability, but also increases the risk of losses.

The maturities of assets and liabilities and the ability to replace, at an acceptable cost, interest bearing liabilities as they mature, are important factors in assessing the liquidity of the Bank.

Liquidity Risk Management Framework

The Bank’s Liquidity Risk Policy defines the following supervisory and control structure:

(a) BRC's role is to approve all strategic liquidity risk management decisions and monitor the quantitative and qualitative aspects of liquidity risk;
(b) Group Assets and Liabilities Committee has the mandate to form and implement the liquidity policies and guidelines in conformity with Bank's risk appetite and to review at least monthly the overall liquidity position of the Bank;
(c) Group Treasury is responsible for the implementation of the Bank's liquidity strategy, the daily management of the Bank’s liquidity and for the preparation and monitoring of the Bank’s liquidity budget;
(d) Group Market and Counterparty Risk Sector is responsible for the measuring, monitoring and reporting of the liquidity risk of the Bank.

The Bank as per ECB, EBA & BoG directives applies risk management policies, processes and controls regarding, Asset Encumbrance / Liquidity Buffers and Collateral Management, Contingency Funding Plan (CFP), Intraday Liquidity Risk Management and Liquidity Stress Tests. These policies, processes and controls along with the liquidity governance are described in the ILAAP (Internal Liquidity Adequacy Assessment Process).

These policies, processes and controls are applicable in the specific Greek macro-economic environment, Banks’ business model and market conditions on wholesale funding.

Liquidity Buffer

The Bank holds a diversified portfolio of cash and high liquid assets to support payment obligations and contingent deposit withdrawals in a stressed market environment. The Bank's assets held for managing liquidity risk comprise of:

(a) Cash and balances with central banks;

(b) Eligible bonds and other financial assets for collateral purposes;

(c) Interbank placings maturing within one month.

Liquidity Risk

The Bank in 2021 further increased the long-term funding from the ECB through TLTRO III funding (ECB funding increased from € 7.25 billion as of December 2020 to € 10.92 billion as of December 2021, which consists entirely of TLTRO funding). Moreover, inflows mainly from deposits (+ € 2.8 billion in 2021 at a solo level), along with the successful issuance of two senior preferred notes that served both funding / liquidity and MREL compliance purposes (€ 0.5 billion each note issued in May and September 2021 respectively), significantly contributed to the formation of High-Quality Liquid Assets (HQLAs) buffer and to the further increase of the Liquidity Coverage Ratio (LCR). It should be also noted that a significant part of the extra liquidity generated in 2021 was invested in non-HQLA securities (AAA rated CLOs, High Yield securities etc.) in order to improve the Bank's NII under the negative yields environment that prevailed in 2021.

LCR calculations

LCR as of December 2021 is equal to 160.1% on a solo level (December 2020 123.4%). The next table presents the key components of Bank's LCR, as per the respective guidelines on LCR disclosure (EBA/GL/2017/01). It should be noted that the data points used in the calculations below, refer to the period after the restoration of the LCR above the minimum regulatory threshold (100%).

The table below shows the level and components of the Liquidity Coverage Ratio.

Table 37: LIQ1 – Liquidity Coverage ratio

		Total unweighted value		Total weighted value	
Quarter ending on		**31 December 2021**	31 December 2020	**31 December 2021**	31 December 2020
		€ million	€ million	**€ million**	€ million
Number of data points used in the calculation of averages		**12**	7	**12**	7
HIGH-QUALITY LIQUID ASSETS					
1	**Total high-quality liquid assets (HQLA)**			**8,904**	5,548
CASH-OUTFLOWS					
2	**Retail deposits and deposits from small business customers, of which:**	**23,478**	21,275	**1,354**	1,215
3	Stable deposits	19,883	18,253	994	913
4	Less stable deposits	3,595	3,022	359	302
5	**Unsecured wholesale funding**	**7,490**	7,246	**3,297**	3,238
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	-	-	-	-
7	Non-operational deposits (all counterparties)	7,490	7,173	3,297	3,164
8	Unsecured debt	-	73	-	73
9	**Secured wholesale funding**			**401**	115
10	Additional requirements	**1,401**	1,197	754	602
11	Outflows related to derivative exposures and other collateral requirements	683	537	683	537
12	Outflows related to loss of funding on debt products	-	-	-	-
13	Credit and liquidity facilities	717	660	71	65
14	**Other contractual funding obligations**	-	-	-	-
15	**Other contingent funding obligations**	**2,191**	2,173	**144**	143
16	**TOTAL CASH OUTFLOWS**			**5,949**	5,312
CASH-INFLOWS					
17	Secured lending (eg reverse repos)	509	1,090	12	-
18	Inflows from fully performing exposures	200	265	143	206
19	Other cash inflows	1,142	1,270	229	254
20	**TOTAL CASH INFLOWS**	**1,852**	2,625	**384**	460
EU-20a	***Fully exempt inflows***	-	-	-	-
EU-20b	***Inflows Subject to 90% Cap***	-	-	-	-
EU-20c	***Inflows Subject to 75% Cap***	***1,852***	*2,625*	***384***	*460*
				TOTAL ADJUSTED VALUE	
21	**LIQUIDITY BUFFER**			**8,904**	5,548
22	**TOTAL NET CASH OUTFLOWS**			**5,565**	4,852
23	**LIQUIDITY COVERAGE RATIO (%)**			**159.55%**	114.13%

Table 38: LIQ2 – Net Stable Funding Ratio

Available stable funding (ASF) Items	31 December 2021				
	Unweighted value by residual maturity				Weighted value
	No maturity[1] € million	< 6 months € million	6 months to < 1yr € million	≥ 1yr € million	€ million
Capital items and instruments	**3,978**	**-**	**-**	**950**	**4,928**
Own funds	3,978	-	-	950	4,928
Other capital instruments		-	-	-	-
Retail deposits		**24,975**	**815**	**4**	**24,299**
Stable deposits		20,995	685	3	20,600
Less stable deposits		3,980	130	1	3,700
Wholesale funding:		**13,510**	**2,242**	**9,454**	**16,100**
Operational deposits		-	-	-	-
Other wholesale funding		13,510	2,242	9,454	16,100
Interdependent liabilities		**-**	**-**	**-**	**-**
Other liabilities:	**-**	**1,224**	**1**	**1,644**	**1,644**
NSFR derivative liabilities	-				
All other liabilities and capital instruments not included in the above categories		1,224	1	1,644	1,644
Total available stable funding (ASF)					**46,971**

Required stable funding (RSF) Items	31 December 2021				
	Unweighted value by residual maturity				Weighted value
	No maturity[1] € million	< 6 months € million	6 months to < 1yr € million	≥ 1yr € million	€ million
Total high-quality liquid assets (HQLA)					**3,539**
Assets encumbered for a residual maturity of one year or more in a cover pool		**157**	**145**	**4,011**	**3,666**
Deposits held at other financial institutions for operational purposes		**-**	**-**	**-**	**-**
Performing loans and securities:		**2,511**	**1,806**	**22,699**	**23,298**
Performing securities financing transactions with financial customerscollateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		729	2	314	388
Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		1,681	1,725	17,214	21,063
With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
Performing residential mortgages, of which:		87	79	3,038	-
With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		14	-	2,132	1,847
Interdependent assets		**-**	**-**	**-**	**-**
Other assets:		**2,149**	**-**	**11,307**	**11,410**
Physical traded commodities				-	-
Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	336	286
NSFR derivative assets		28			28
NSFR derivative liabilities before deduction of variation margin posted		1,687			84
All other assets not included in the above categories		434	-	10,971	11,012
Off-balance sheet items		**3,291**	**-**	**-**	**165**
Total RSF					**42,078**

NSFR	31 December 2021
Net Stable Funding Ratio (%)	**111.63%**

Appendix 1: EU CC1 – Composition of regulatory own funds

Appendix 1: EU CC1 - Composition of regulatory own funds

		31 December 2021 (1) Current period € million	31 December 2021 Current period € million	31 December 2020 (1) Current period € million	31 December 2020 Current period € million
Common Equity Tier 1 (CET1) capital: instruments and reserves					
1	Capital instruments and the related share premium accounts	3,941	3,941	4,052	4,052
2	Retained earnings	(622)	(622)	(201)	(201)
3	Accumulated other comprehensive income (and other reserves, to include unrealised gains and losses under the applicable accounting standards)	659	659	298	298
5	Minority interests (amount allowed in consolidated CET1)	-	-	-	-
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	469	-	15	
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**4,447**	**3,978**	4,164	4,149
Common Equity Tier 1 (CET1) capital: regulatory adjustments					
7	Additional value adjustments due to the prudent valuation (negative amount)	(10)	(10)	(11)	(11)
8	Intangible assets (net of related tax liability) (negative amount)	(116)	(116)	(117)	(117)
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	-	-	-
11	Fair value reserves related to gains or losses on cash flow hedges	12	12	49	49
12	Negative amounts resulting from the calculation of expected loss amounts	(17)	(17)	(17)	(17)
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-		-	-
15	Defined-benefit pension fund assets (negative amount)	-	-	-	
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	-	-	-	-
18	Direct and indirect holding by the institution of the CET 1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-		
19	Direct , indirect and synthetic holding by the institution of the CET 1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-		
EU-20a	Exposure amount of the following items which qualify for a RW of 1250% where the institution opts for the deduction alternative	(16)	(16)	-	-
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in art. 38 (3) are met) (negative amount)	(438)	(485)	(418)	(419)
22	Amount exceeding the 17.65% threshold (negative amount)	-	-	-	-
EU-25a	Losses for the current financial year (negative amount)	-	-	-	-
27	Qualifying AT1 deductions that exceed the AT1 capital of the institution (negative amount)	-	-	-	-
27a	Other regulatory adjusments (2)	234	234	595	595
28	**Total regulatory adjustments to Common equity Tier 1 (CET1)**	**(351)**	**(398)**	81	80
29	**Common Equity Tier 1 (CET1) capital**	**4,096**	**3,580**	4,245	4,229
Additional Tier 1 (AT1) capital: instruments					
30	Capital instruments and the related share premium accounts	-	-	-	-
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1 as described in Article 486(3) of CRR	-	-	-	-
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**	**-**	**-**	-	-
Additional Tier 1 (AT1) capital: regulatory adjustments					
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)	-	-	-	-
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**-**	**-**	-	-
44	**Additional Tier 1 (AT1) capital**	**-**	**-**	-	-
45	**Tier 1 capital (T1 = CET1 + AT1)**	**4,096**	**3,580**	4,245	4,229
Tier 2 (T2) capital: instruments					
46	Capital instruments and the related share premium accounts	950	950	950	950
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2	-	-	-	-
50	Credit risk adjustments	89	89	115	115
51	**Tier 2 (T2) capital before regulatory adjustments**	**1,039**	**1,039**	1,065	1,065
Tier 2 (T2) capital: regulatory adjustments					
56b	Other regulatory adjusments to T2 capital	(89)	(89)	(115)	(115)
57	**Total regulatory adjustments to Tier 2 (T2) capital**	**-**	**-**	-	-
58	**Tier 2 (T2) capital**	**950**	**950**	950	950
59	**Total Capital (TC = T1 + T2)**	**5,046**	**4,530**	5,195	5,179
60	**Total risk weighted assets**	**32,983**	**32,865**	34,185	34,181

Appendix 1: EU CC1 – Composition of regulatory own funds

		31 December 2021 [1] Current period € million	31 December 2021 Current period € million	31 December 2020 [1] Current period € million	31 December 2020 Current period € million
Capital ratios and requirements including buffers					
61	Common Equity Tier 1	**12.4%**	**10.9%**	12.4%	12.4%
62	Tier 1	**12.4%**	**10.9%**	12.4%	12.4%
63	Total capital	**15.3%**	**13.8%**	15.2%	15.2%
64	Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD) expressed as a percentage of risk exposure amount)	8.71%	8.71%	8.70%	8.70%
65	of which: capital conservation buffer requirement	2.50%	2.50%	2.50%	2.50%
66	of which: countercyclical buffer requirement	0.02%	0.02%	0.01%	0.01%
67	of which: systemic risk buffer requirement	0.00%	0.00%	0.00%	0.00%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	0.00%	0.00%	0.00%	0.00%
68	Common Equity Tier 1 available to meet buffer (as a percentage of risk exposure amount)	**4.17%**	**2.64%**		
Amounts below the thresholds for deduction (before risk weighting)					
72	Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions	38	38	51	51
73	Direct and indirect holdings by the institution of CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	69	69	24	24
75	Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability where the conditions in 38 (3) are met)	383	383	404	404
Applicable caps on the inclusion of provisions in Tier 2					
76	Credit risk adjustments included in T2 in respect of exposures subject to standardized approach (prior to the application of the cap)	-	-	-	-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	141	141	140	140
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	89	89	352	352
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	104	104	115	115
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)					
80	Current cap on CET1 instruments subject to phase out arrangements	-	-	-	-
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	-	-	-
82	Current cap on AT1 instruments subject to phase out arrangements	0%	0%	0%	0%
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	-	-	-
84	Current cap on T2 instruments subject to phase out arrangements	0%	0%	0%	0%
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	-	-	-

[1] Including profits € 469 million for year ended 31 December 2021 and €15 million for year ended 31 December 2020.
[2] Includes mainly the IFRS 9 transitional adjustments.
[3] The pro-forma CET1 and Total Capital Adequacy ratios as at 31 December 2021 with the completion of the sale of Eurobank's merchant acquiring business would be 13.4% and 16.3%, respectively.

APPENDIX 2: CAPITAL INSTRUMENTS' MAIN FEATURES DISCLOSURE

1	Issuer	**Eurobank S.A.**	**Eurobank S.A.**
2	Unique identifier	213800KGF4EFNUQKAT69	ISIN Code: HO0000000001
3	Governing law(s) of the instrument	Greek	English law, with the exception of Condition 3B *(Status-Subordinated Instruments)* and Condition 22 *(Bank Holders' Agent)* which are governed by the laws of the Hellenic Republic and Regulation No.575/2013 (CRR) and Condition 23 (Acknowledgement of Statutory Loss Absorption Powers).
	Regulatory treatment		
4	Transitional CRR rules	Common Equity Tier 1	Tier2
5	Post- transitional CRR rules	Common Equity Tier 1	Tier2
6	Eligible at solo/(sub-) consolidated/solo & (sub-) consolidated	Solo & Consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Tier 2 Subordinated Capital Instrument (Art.63 of the CRR)
8	Amount recognised in regulatory capital as at 31 December 2020	€4.052million	N/A - The instruments were Issued in March 2020
9	Nominal amount of instrument	€1,10 per ordinary share (at date) / €4.052million	950,000,000
9a	Issue price	-	100%
9b	Redemption price	-	Redemption at par (100 per cent of nominal amount) together with interest accrued up to (but excluding) the date of redemption
10	Accounting classification	Shareholders Equity	Liability - amortised cost
11	Original date of issuance	Various	20 March 2020
12	Perpetual or dated	Perpetual	Dated
13	Original maturity date	-	17 January 2028
14	Issuer call subject to prior supervisory approval	NA	Yes
15	Optional call date, contingent call dates and redemption amount	NA	First date of call: 17 January 2023. The instruments have also a Tax and Capital Disqualification Event call (Art.78(4) of CRR).In both cases, the instruments may be redeemed in whole but not in part. Redemption at par together with interest accrued.
16	Subsequent call dates, if applicable	NA	Optional subsequent call dates: Any day after 17 January 2023.Tax and Capital Disqualification Event call : at any time
	Coupon / dividends	NA	
17	Fixed or floating dividend/coupon	NA	Fixed
18	Coupon rate and any related index	NA	6.41%
19	Existence of a dividend stopper	NA	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Partially discretionary	Mandatory
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Partially discretionary	Mandatory
21	Existence of step up or other incentive to redeem	No	No
22	Noncumulative or cumulative	Non cumulative	Noncumulative
23	Convertible or non-convertible	Non convertible	Non-convertible
24	If convertible, conversion trigger(s)	NA	N/A
25	If convertible, fully or partially	NA	N/A
26	If convertible, conversion rate	NA	N/A
27	If convertible, mandatory or optional conversion	NA	N/A
28	If convertible, specify instrument type convertible into	NA	N/A
29	If convertible, specify issuer of instrument it converts into	NA	N/A
30	Write-down features	No	Yes
31	If write-down, write-down trigger(s)	NA	Statutory & Condition 23 (Acknowledgement of Statutory Loss Absorption Powers) , Bank of Greece
32	If write-down, full or partial	NA	Fully or partially
33	If write-down, permanent or temporary	NA	Permanent
34	If temporary write-down, description of write-up mechanism	NA	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Additional Tier I	Immediately subordinate to the claims of Senior Creditors (as defined in Condition 3B)
36	Non-compliant transitioned features	No	No
37	If yes, specify non-compliant features	N/A	N/A

Appendix 3: List of Abbreviations

Abbreviation	Definition
ABSs	Asset Backed Securities
A-IRB	Advanced Internal Rating Based Approach
AQR	Asset Quality Review
AT1	Additional Tier 1
BoD	Board of Directors
BoG	Bank of Greece
BRC	Board Risk Committee
BRRD	Bank Recovery and Resolution Directive
BTAR	Banking Book Taxonomy Alignment Ratio
CCB	Capital Conservation Buffer
CCyB	Counter Cyclical Buffer
CCF	Credit Conversion Factor
CCP	Central Counterparty
CCR	Counterparty Credit Risk
CET1	Common equity Tier 1
COREPs	Common Reports
CRD IV	Capital Requirements Directive IV
CRR	Capital Requirements Regulation
CSA	Credit Support Annex
CVA	Credit Value Adjustment
DoD	Definition of Default
EAD	Exposure At Default
EBA	European Banking Authority
EC	European Commission
ECAIs	External Credit Assessment Institutions
ECB	European Central Bank
ECL	Expected Credit Loss
ESG	Enviromental, Social and Governance
F-IRB	Foundation Internal Rating Based Approach
GAR	Green Asset Ratio
GGBs	Greek Government Bonds
GMRA	Global Master Repurchase Agreement
G-SIIs	Global Systemic Institution Buffer
HAPS	Hellenic Asset Protection Scheme
HDIGF	Hellenic Deposit and Investment Guarantee Fund
HQLA	High Quality Liquid Assets.
ICAAP	Internal Capital Adequacy Assessment Process
ILAAP	Internal Liquidity Adequacy Assessment Process
IMA	Internal Model Approach
IRB	Internal Ratings Based Approach
IRR	Interest Rate Risk
IRRBB	Interest Rate risk in the Banking Book
IRC	Incremental Risk Charge
ISDA	International Swaps and Derivatives Association
ITS	Implementing Technical Standards
LCR	Liquidity Coverage Ratio
LGD	Loss Given Default
MDA	Maximum Distributable Amount
MRA	Moody's Risk Advice
MREL	Minimum Requirement for own funds and Eligible Liabilities
MRO	Main Refinancing Operations
NPV	Net Present Value
OCR	Overall Capital Requirement
O-SIIs	Other Systemically Important Institution
PD	Probability of Default
P2G	Pillar 2 Guidance
P2R	Pillar 2 Requirement
RBA	Ratings Based Approach
RCSA	Risk & Control Self-Assessment
RSS	Remedial & Servicing Strategy Sector
RTS	Regulatory Technical Standards
RWAs	Risk Weighted Assets
SA	Standard Approach
SEC-ERBA	Securitisation-External Ratings Based Approach
SFDR	Sustainable Finance Disclosure Regulation
SFTs	Securities Financing Transactions
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SRF	Single Resolution Fund
SRM	Single Resolution Mechanism
SPE	Single Point of Entry
SPV	Special Purpose Vehicle
SSM	Single Supervisory Mechanism
SyRB	Systemic Risk Buffer
TSCR	Total SREP Capital Requirement
TLTRO	Targeted Long Term Refinancing Operations
TSCR	Total SREP Capital Requirement
TTC	Through The Cycle
VAR	Value at Risk

Appendix 4: Guidelines and Regulations mapping on Disclosures Requirements

	EBA/GL/2016/11	
INS1	Non-deducted participations in insurance undertakings	*Table 9*
OV1	Overview of risk weighted exposure amounts	*Table 8*
CR1-A	Maturity analysis of exposures	*Table 10*
CR3	CRM techniques – Overview: Disclosure of the use of credit risk mitigation techniques	*Table 31*
CR4	Standardised approach – Credit risk exposure and CRM effects	*Table 25*
CR7	IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques	*Table 29*
CR7-A	IRB approach - Disclosure of the extent of the use of CRM techniques	*Table 30*
CR8	RWEA flow statements of credit risk exposures under the IRB approach	*Table 26*
CR10	Specialised lending under the simple risk weighted approach	*Table 27*
CR10	Equity Exposures under the simple risk weighted approach	*Table 28*
CCR7	RWEA flow statements of CCR exposures under the IMM	*Table 33*
MR2-B	RWA flow of market risk exposures under IMA	*Table 32*
	REVISED PILLAR 3 DISCLOSURES REQUIREMENTS - BCBS	
KM1	Key Metrics template	*Table 2*
LIQ2	Net Stable Funding Ratio	*Table 38*
	GUIDELINES ON LCR DISCLOSURE - EBA/GL/2017/01	
LIQ1	Quantitative information of LCR	*Table 37*
	LEVERAGE RATIO - COMMISSION IMPLEMENTING REGULATION (EU) 2016/200	
LR1	LRSum: Summary reconciliation of accounting assets and leverage ratio exposures	*Table 34*
LR2	LRCom: Leverage ratio common disclosure	*Table 35*
LR3	LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)	*Table 36*
	OWN FUNDS REQUIREMENTS - COMMISSION IMPLEMENTING REGULATION (UE) 1423/2013	
CC1	Composition of regulatory own funds	*Appendix 1*
CC2	Reconciliation of regulatory own funds to balance sheet in the audited financial statements	*Table 3*
	COUNTERCYCLICAL CAPITAL BUFFER - COMMISSION DELEGATED REGULATION (EU) 2015/1555	
CCyB1	Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital	*Table 5*
CCyB2	Amount of institution-specific countercyclical capital buffer	*Table 6*
	GUIDELINES ON UNIFORM DISCLOSURES UNDER ARTICLE 473A OF REGULATION (EU) NO 575/2013 AS REGARDS THE TRANSITIONAL PERIOD FOR MITIGATING THE IMPACT OF THE INTRODUCTION OF IFRS 9 ON OWN FUNDS - EBA/GL/2018/01	
IFRS 9-FL	Comparison of equity, capital ratios and leverage of entities with or with out the application of the transitional arrangements of IFRS 9 or analog ECL	*Table 4*
	GUIDELINES ON DISCLOSURE OF NON-PERFORMING AND FORBORNE EXPOSURES - EBA/GL/2018/10	
CQ1	Credit quality of forborne exposures	*Table 11*
CQ2	Quality of forbearance	*Table 16*
CQ3	Credit Quality of performing and non-performing exposures by past due days	*Table 12*
CR1	Performing and non-performing exposures and related provisions	*Table 13*
CQ4	Quality of Non-performing exposures by geography	*Table 14*
CQ5	Credit quality of loans and advances to non-financial corporations by industry	*Table 15*
CQ6	Collateral valuation - Loans and advances	*Table 17*
CR2	Changes in the stock of non-performing loans and advances	*Table 18*
CR2a	Changes in the stock of non-performing loans and advances and related net accumulated recoveries	*Table 19*
CQ7	Collateral obtained by taking possession and execution processes	*Table 20*
CQ8	Collateral obtained by taking possession and execution processes – Vintage breakdown	*Table 21*
	Legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis EBA/GL/2020/02	
COVID_1	Information on loans and advances subject to legislative and non-legislative moratoria	*Table 22*
COVID_2	Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria	*Table 23*
COVID_3	Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis	*Table 24*